

Annual report

2025

Service Police Complaints Commissioner Annual report 2025

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



I am pleased to present the Service Police Complaints Commissioner's (SPCC) annual report for 2025. This foreword sets out the context in which the Office of the SPCC has operated during the year, reflects on the progress made and the

challenges encountered, and looks ahead to the priorities that will shape our work in 2026.

This report, covering the calendar year 2025, is submitted to the Secretary of State for Defence in accordance with Regulation 7(1) of the Service Police (Complaints etc.) Regulations 2023 ('the Regulations').

The Service Police play a key role in the maintenance of discipline and operational effectiveness within the UK Armed Forces, and it is essential that they carry out their functions fairly and efficiently.



Accordingly, the Service Police Complaints Commissioner (the 'Commissioner') plays a vital role in providing independent oversight of the Service Police complaints system. This helps to secure the confidence of Service personnel and the public in the arrangements for dealing with complaints and other matters involving the Service Police.

I was appointed Acting Commissioner in November 2025 after the position became vacant following the elevation of Margaret Obi (the first Commissioner) to the High Court bench in early August of that year. In the intervening three months, Mariette Hughes kindly agreed to be the interim Commissioner while maintaining her role as Service Complaints Ombudsman for the Armed Forces. I am indebted to Margaret for the foundations laid prior to my appointment and to Mariette for stepping into the breach at short notice when required.

My thanks also go to the civil servants at the Office of the SPCC and the investigating officers who carry out its work. They have all shown great resilience and agility responding to the changes at the top of the organisation. A change of leadership can often be unsettling, but the professionalism shown by all has meant that this turbulent period has been managed in a way that has mitigated the impact on performance.

I am particularly grateful to the Chief of Staff at the SPCC, who has taken the lead in drafting the report on my behalf and gathering the evidence that gives the report its substance. It is not an easy task and the detail contained in the report is a testament to her diligence.

The data reveals that, leaving aside the work carried over from 2024, in 2025 the SPCC dealt with **33** referrals, nine of which resulted in independent investigations by the Commissioner. In addition, the SPCC received **four** applications to review the outcome of a local investigation by an Appropriate Authority (AA). The independent investigations and the reviews are carried out by a team of five investigating officers, one of whom works part-time. In most cases,

each investigation is conducted by a single investigating officer working alone, although they assist each other when necessary.

The report does not seek to conceal the challenges faced by the SPCC and includes instances where we have met, and failed to meet, our Key Performance Indicators (KPIs). The SPCC has limited resources and even a small increase in the number of cases we are required to handle can have a significant impact on the efficiency with which we process casework and the scope of the work we can do to oversee the way the AAs discharge their responsibilities under the statutory framework. This means that we need to target our resources to fulfil the main functions of the SPCC and maintain the confidence of Service personnel (including Service Police officers) and the public.

Against that background, the SPCC has focused on key strategic objectives since my appointment. We have sought to increase understanding of how the statutory framework operates so that the regulatory provisions are applied correctly by all those who have responsibility for operating the system. The publication of the SPCC Statutory Guidance in December 2025 has assisted greatly in this regard, although I have also found that frank discussions with subject matter experts working within stakeholder groups have been hugely beneficial in making the system work more efficiently by getting things right first time.

Additionally, the SPCC has realigned the resources at our disposal so that they are focused on serious matters where the public interest is served by independent scrutiny. The SPCC is not a Service Police force and, unlike the Professional Standards Departments (PSDs), does not have the forensic capabilities required to investigate certain serious incidents.

However, the SPCC does have the capability to investigate allegations that Service Police officers have failed to exercise their powers correctly or have abused their position. Where an investigation needs the capability of a PSD and the independent scrutiny of the SPCC, the Commissioner has the power to determine there should be a directed investigation.

Despite the challenges, the report highlights that the SPCC continues to make improvements to our ways of working. Recommendations from the SPCC's 2023 and 2024 annual reports remain outstanding in some areas. This year's recommendations should be read in that context. Looking ahead to 2026, we are hoping to deliver on key projects including the acquisition of a case management system, the establishment of the SPCC website and the implementation of a participant support scheme. From a personal perspective, I am looking forward to visiting the Provost Marshals and the PSDs to see the procedures they have established for recording and handling the cases that come to their attention. My regular interactions with the Provost Marshals have been overwhelmingly positive and they are invested in making sure the system works as well as it can. All those charged with operating the statutory system share the goal of maintaining high standards within Service policing.

We remain determined in our mission to deliver fair, independent and timely determinations, and to share learning for the benefit of all.



Jonathan Rees KC
(Acting Commissioner)

Chapter 1:

Introduction



Summary

The Office of the SPCC has prepared this report on behalf of the Commissioner. During 2025 there were two changes of Commissioner, and the current Acting Commissioner was in post for the final two months of the reporting year.

The report covers the period January to December 2025, as required by Regulation 7 of the Service Police (Complaints etc.) Regulations 2023 ('the Regulations'). The report is divided into six chapters, each linked to a strategic objective and supported by key performance indicators (KPIs).

1. Introduction including strategic framework and report at a glance
2. Delivering fair, independent, and timely outcomes
3. Identifying and sharing learning for continuous improvement
4. Increasing awareness and transparency
5. Operating efficiently and effectively
6. Conclusion and forward look

The report uses data throughout to show volumes, outcomes and performance for the Professional Standards Departments (PSDs) and the SPCC. The report also sets out key challenges in 2025, and the actions planned for 2026.

Strategic framework: objectives and statutory functions (Regulation 3(1))

Maintaining trust in the complaints system is critical to supporting the Service Police and, in turn, the Armed Forces they serve. Independent scrutiny helps safeguard fairness, accountability and public confidence.

Under Regulation 7(1), the Commissioner must report on how the Commissioner's functions were carried out during the reporting year. Those functions are set out in Regulation 3. The strategic objectives developed by the first Commissioner, rooted in the statutory functions, provide the structure for this report. **Figure 1 (in annex A)** links each strategic objective to the relevant statutory function(s) and shows where each objective is addressed in the report. Chapters 2 to 5 explain how the SPCC has delivered these objectives. A full list of figures is provided at **annex B**.

Report at a glance

Figure 2 (report at a glance) provides a concise overview of what is covered in each chapter, including key takeaways and recommendations.

Where in the report	Focus of coverage	Key takeaways	Recommendations
Chapter 1	Introduction, strategic framework and report overview	I. Explains the purpose and structure of the report, and how strategic objectives and KPIs are used to assess performance.	N/A
Chapter 2	Fair, independent and timely outcomes	I. Timeliness performance was affected by organisational change: the SPCC changed Commissioner twice during 2025, which impacted on continuity and contributed to delay (particularly in triage decision-making). II. Independent investigations decreased from 14 (2024) to 9 (2025). Four reviews were also undertaken, an increase of three from 2024.	The report recommends that the MOD strengthens the SPCC’s investigative capacity to improve timeliness.

Where in the report	Focus of coverage	Key takeaways	Recommendations
Chapter 3	Organisational learning	I. All Service Police forces reported learning activity at varying levels, but evaluation of impact needs developing. II. In response to feedback about the impact of investigations, the SPCC is developing an independent welfare support service for participants (complainants, respondents, witnesses and relevant family members, including in death or serious injury matters). This will include veterans who would not have access to Employment Assistance Programmes. The service will sit alongside existing Armed Forces support but remain independent of MOD welfare channels.	MOD should sponsor senior-level briefings (including Single Service Boards and Defence governance) to embed shared understanding of the Statutory Guidance and create a clear route to resolve points of interpretation and operational friction.
Chapter 4	Awareness and transparency	I. Publishing the Statutory Guidance improved understanding, but awareness still depends heavily on engagement activity.	MOD should: – introduce a short, optional, SPCC module in the Defence Learning Environment – ensure SPCC insights and organisational learning feed into pan-Defence standards and conduct programmes – complete cyber-security assurance so SPCC materials can be published online

Where in the report	Focus of coverage	Key takeaways	Recommendations
Chapter 5	Efficiency and effectiveness	I. The SPCC is managing its budget carefully, but current staffing levels do not match rising demand or regulatory expectations. II. Efficiency also relies on joined-up working, including SPCC observer-level engagement at key MOD boards so risks and learning are addressed early.	MOD should: – agree a sustainable staffing model for the SPCC to match statutory responsibilities and rising demand, reducing reliance on staff covering multiple roles – formalise SPCC representation on relevant MOD governance forums, for example, Service Justice Executive Group and Defence Risk and Assurance, to support joined-up working and reduce siloed decision-making
Chapter 6	Conclusion and forward look	I. Draws together the main findings from the year and sets out the SPCC's priorities for 2026.	N/A

Service Police personnel



Chapter 2:

**Delivering fair,
independent and
timely outcomes**



Strategic objective 1: Deliver fair, independent and timely outcomes.
Consistently deliver impartial, fair and evidence-based outcomes in a timely way.

Context

Delivering independent, fair and evidence-based outcomes is central to the work of the SPCC. This underpins all investigations into complaints, conduct matters and death or serious injury (DSI) cases¹. Timely investigations support fair outcomes, maintain confidence in the Service Police complaints system, and reduce the impact on all those involved. However, timeliness must not come at the expense of necessary diligence, as thoroughness is essential to ensure outcomes are accurate, just, and to maintain trust in the process.

The SPCC is committed to delivering outcomes in a fair and timely manner. How we do this is set out in the **SPCC's Statutory Guidance**, which details clear standards and expectations for complaint handling, as well as explaining the regulations that underpin the SPCC. This ensures consistency, helps Service Police comply with their legal obligations, and provides clarity for complainants and respondents about the statutory process.

Referrals

The SPCC objectively assesses all information provided through the Service Police Complaints Form to reach appropriate determinations. This includes deciding whether a referral is valid, assessing if the matter needs investigation and, if so, determining the appropriate mode of investigation. The SPCC strives to ensure that independent investigations (investigations by the Commissioner) are fair to complainants and respondents, and promote confidence in Service Police accountability.

The SPCC monitors performance through a range of KPIs. These include monitoring how quickly the SPCC acknowledges referrals and makes decisions on the appropriate mode of investigation for matters referred by Appropriate Authorities (AAs) and complaints received directly from complainants.

Data insights: 2025 performance

An overview of the SPCC case referral pathway

This section summarises the overall demand and caseload since the SPCC was established. It shows a noticeable increase in demand for case handling by both PSDs and the SPCC. Since the SPCC was established in June 2023:

- **referrals increased notably** from five cases in the first six months of regulatory jurisdiction, from June 2023, to **31** cases in 2024 – volumes were then broadly stable in 2025, at **33** cases
- **reviews** also increased, with **one** review in 2023 over the first six months, **one** in 2024, and **four** in 2025
- **logged cases by Professional Standards Departments (PSDs) increased year on year:** **69** in the first six months of 2023, **91** in 2024, and **139** in 2025

Taken together, these trends show that demand has increased, particularly in 2025.

¹ In this report, unless otherwise specified, "cases" includes complaints, conduct matters and DSI matters.

Definitions

Logged cases are those captured by a PSD at the initial point of contact. In this report, 'logged' means the PSD has noted the basic details (for example, who raised the issue, what it is about, and when it was received), including where the matter does not meet the criteria to be recorded. Logging supports oversight of volumes and emerging trends.

Recorded complaints are a subset of logged complaints. A complaint is an expression of dissatisfaction with a Service Police force or a member of a Service Police force by someone who has the status to make a complaint. A complaint is 'recorded' when it meets the criteria in the Regulations and is to be dealt with under the statutory framework. Once recorded, the matter must be handled in accordance with Part 3 of the Regulations.

For the purposes of this section, 'logged cases by PSDs' include complaints, conduct matters and DSI matters. This is consistent with the general definition of 'cases' used in this report, unless otherwise specified. Where the analysis refers to referrals, this means the subset of logged and recorded matters that PSDs submit to the SPCC under the Regulations. The proportions of logged, recorded and referred cases that are classed as complaints, conduct matters or DSI matters are shown later in the report (see **figure 5** for referral decisions, and **figures 8** and **9** for the relationship between logged, referred and recorded cases).

All DSI matters must be recorded, whereas not all complaints and conduct matters must be recorded. The Regulations set out the circumstances in which complaints and conduct matters are required to be recorded.

Conduct matters and DSI matters

In brief, conduct matters relate to allegations of Service Police misconduct above a certain threshold, which are not the subject of a formal complaint. DSI matters may arise where a person dies or is seriously injured when in the custody of, or following contact with, the Service Police and the matter is not the subject of a complaint. All DSI matters must be recorded and referred to the SPCC. For full statutory definitions and detailed criteria, see the SPCC Statutory Guidance and **annex C**.

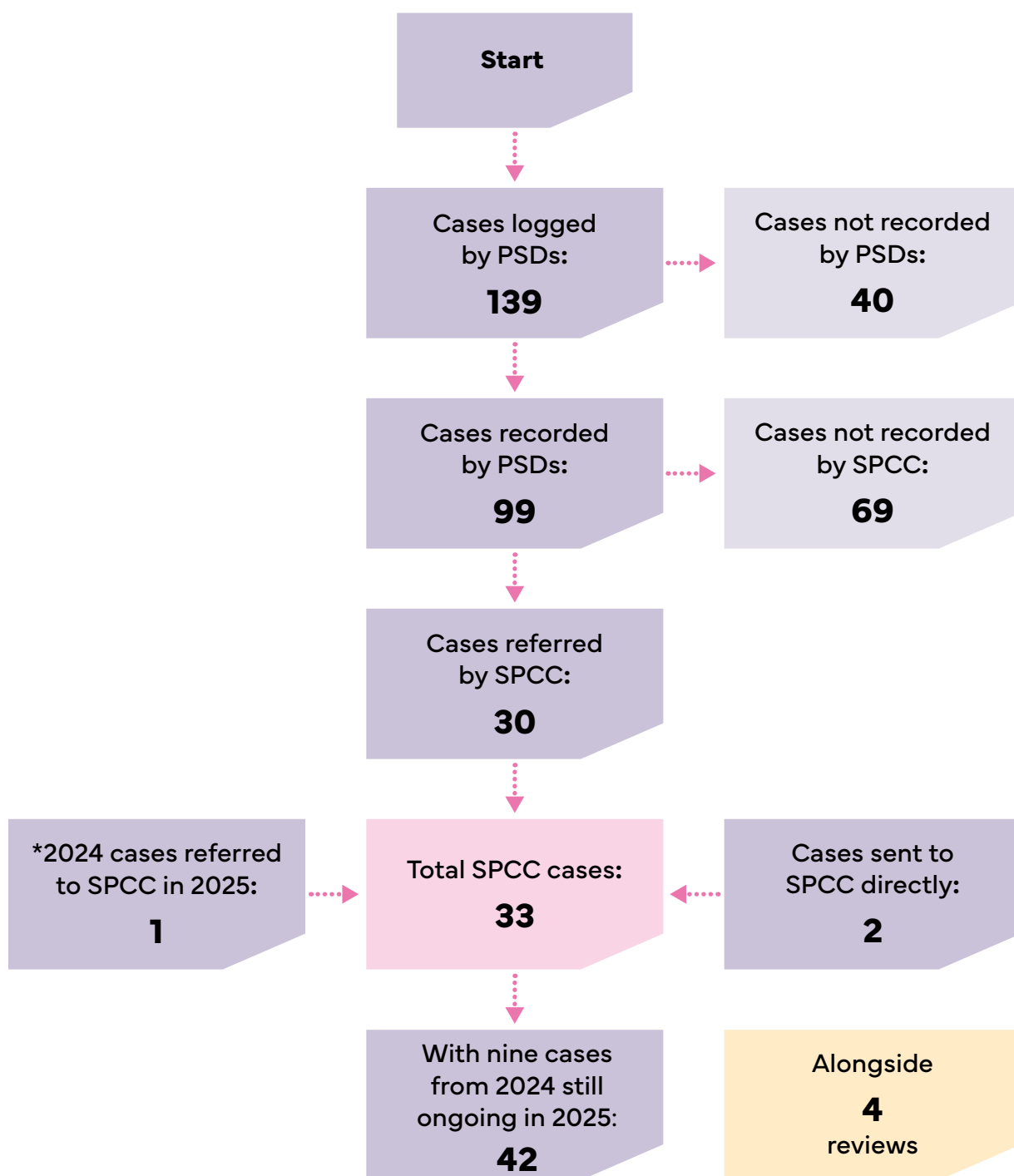
Figure 3(a), summarises the key differences between complaints, conduct matters and DSI matters, and how recording and referral work in practice.

Figure 3(a): How complaints, conduct matters and DSI matters enter the system (recording and referral overview)

Complaint	Conduct matter	DSI matter
Trigger: someone formally expresses dissatisfaction about the Service Police or a member of it. Recording: recorded if it meets the criteria in the Regulations. Referral to SPCC: some recorded complaints must be referred in defined circumstances, called mandatory referrals. Other referrals may be voluntary (see figures 3 and 5).	Trigger: indication a Service Police member may have committed a Service offence or behaved in a way that could lead to administrative action, but no formal complaint has been made. Recording: recorded if the Regulations require recording, but no requirement to record where, for example, criminal or disciplinary proceedings or administrative action are already in progress. Referral to SPCC: some recordable conduct matters must be referred and others may be voluntarily referred.	Trigger: a person dies or is seriously injured while detained by, in the custody of, or after contact with a member of a Service Police force, and the matter is not already the subject of a complaint (see annex C). Recording: all DSI matters must be recorded. Referral to SPCC: all DSI matters must be referred to the SPCC.
Key point: ‘Logged’ cases can include complaints, conduct matters and DSI matters. Only a subset is recorded under the Regulations, and only a further subset is referred to the SPCC. DSI matters are the exception as they must always be both recorded and referred. Note: where the SPCC treats a conduct matter as referred, it must also be recorded by the AA.		

With these definitions in mind, **figure 3** summarises how complaints, conduct matters and DSI matters move from being logged and recorded by PSDs to the smaller proportion that are referred to the SPCC.

Figure 3: An overview of SPCC caseload by source, 1 January 2025 to 31 December 2025



*These cases were logged by their relevant PSD in 2024 and were referred to the SPCC in 2025.

Figure 3 illustrates the pathway from cases being logged and recorded by PSDs through to the smaller proportion that are referred to, and received by, the SPCC. It shows the key decision points within the complaints system. Not all cases referred to the SPCC require investigation by the SPCC. Following triage, a significant number are returned to the AA and dealt with through local investigation (discussed later in the report at figure 5).

In 2025, 30 cases were referred to the SPCC by PSDs. These represent referrals of complaints, conduct matters and DSI cases progressing through the complaints system, as shown in **figure 3**. Not all recorded PSD cases are referred to the SPCC.

The SPCC's caseload of 42 cases reflects the combined impact of cases received in year and ongoing activity. During 2025, the SPCC handled **33 cases** received in year, **alongside 9 cases** carried forward from the previous period, giving a total caseload of 42.

Applications for review are a separate statutory process and are not part of the referral pathway. During the reporting period, the SPCC assessed four applications for a review of the outcome of a complaint investigated by the AA. These reviews represent additional workload as illustrated in **figure 3**.

Two of the four reviews were closed in 2025.

KPIs for fairness, independence and measuring timeliness.

Figure 4 shows that the SPCC met most triage KPIs, including timely acknowledgement of referrals and timely decisions on DSI referrals. However, the KPI that requires 70% of investigations to be completed within 12 months from the date of referral was not met. In 2025, this was achieved in only two of the six cases due for completion. The cases where this KPI was not met were more complex and procedurally challenging. Reasons for not meeting this KPI included:

- multiple parties
- extensive representation
- issues requiring careful resolution to ensure fairness and due process

In one case, unforeseen staffing changes during the year affected continuity. In these circumstances, additional time was needed to reach robust and defensible outcomes. Lessons from these cases are reflected in the following chapter.

For reporting purposes, performance against this KPI is calculated using cases that were due for completion within the year and that were finalised within 12 months. Following the 2024 annual report, this KPI was amended to clarify that 'completion' includes the Commissioner's determination to the AA.

As shown in **figure 4**, **44%** of decisions on the appropriate mode of investigation were made within the **10 working day** target. The remaining **56%** were made a few days outside the target, due to either the first change of Commissioner or the need to obtain further information from the AA.

Figure 4: Fairness, independence and measuring timeliness

The table below summarises the KPIs for SPCC's acknowledgement, decisions on referrals, and the completion of investigations.

Description	Target	Supporting data	Outcome
1. Acknowledge receipt of referrals (triage assessment)	Within 5 working days	100% non-DSI referrals met the target	Met
	DSI referrals within 24 hours	100% DSI referrals met the target	Met
2. Commissioner's determination and the mode of investigation (Triage assessment)	Within 10 working days	44% non-DSI referrals met the target	Not met
	DSI referrals within 96 hours	100% DSI referrals met the target	Met
3. Completion of independent/directed investigations	70% of independent/directed investigations completed, including the Commissioner's determination to the AA, within 12 months of the date they were referred to the SPCC.	33% (2 of 6 cases)	Not met

Type of referral and mode of investigation

When the SPCC determines that a referral, whether mandatory or voluntary, requires investigation, the **mode of investigation** is decided. This may take the form of a:

- **local investigation** conducted by the AA on their own behalf
- **directed investigation** where the AA investigates under the direction of the SPCC
- **independent investigation** conducted by the SPCC

In all cases, this determination is made by applying **Regulation 32 of the Service Police (Complaints etc.) Regulations 2023**. This sets out how the Commissioner decides the appropriate mode of investigation having regard to the seriousness of the case and the public interest, which often involves an assessment of the need for there to be independent scrutiny.

Figure 5 illustrates the SPCC's decisions on referrals submitted by AAs in 2025, categorising them as mandatory or voluntary and showing the mode of investigation determined following triage.

Mandatory referrals

Mandatory referrals are matters that the AAs are required to refer to the SPCC. For example, complaints about conduct that has resulted in DSI, a serious assault, a serious sexual offence or serious corruption must be referred to the Commissioner.

Voluntary referrals

Voluntary referrals are matters that the AAs may refer to the SPCC where the mandatory criteria are not met, but the gravity of the subject matter merits referral or exceptional circumstances exist.

Mandatory and voluntary referral categories reflect statutory requirements rather than case themes.

- **Regulation 13 applies to complaints**
- **Regulation 24 to conduct matters**
- **Regulation 29 to DSI matters**

These regulations set out when matters must be referred to the Commissioner and when referral is discretionary. In addition, the Commissioner has the power to treat a complaint, conduct matter or DSI matter as having been referred under the regulations.

Purpose of the analysis

This analysis serves four key purposes.

First, it provides transparency about how referrals are handled in practice.

By showing the relationship between referral type and the mode of investigation selected, the analysis sets out the outcomes of triage decisions made under Regulation 32.

Second, it helps explain how different types of matters progress through the system.

As referral categories are set out by Regulations 13, 24 and 29, looking at how these categories match up with the various modes of investigation shows the journey for complaints, conduct issues and DSI matters after they are referred. This makes it clear how each kind of case moves through the process.

Third, it provides limited assurance about the use of voluntary referrals.

Examining the investigation outcomes relating to voluntary referrals helps the SPCC to assess whether voluntary referrals are being used for cases where an independent investigation is appropriate. Full assurance over cases not referred would require dip-sampling (spot checking a sample of locally handled cases) which sits outside the scope of this analysis.

Fourth, it supports transparency and consistency in decision-making.

The data does not measure public confidence or assess the quality of individual decisions. However, being clear about how decisions are recorded, categorised and reported

makes the system easier to understand and scrutinise. The figures therefore support confidence by being transparent about outcomes.

Figure 5: SPCC decisions on referrals

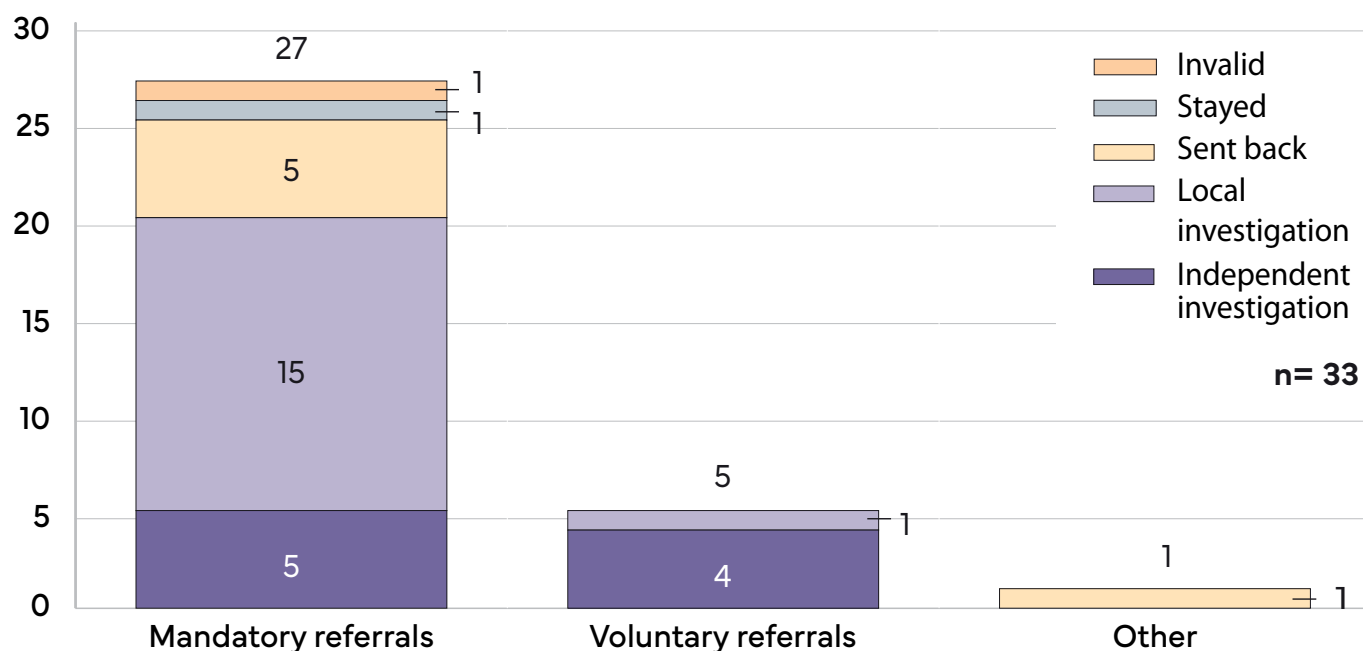


Figure 5 summarises mandatory and voluntary referrals received in 2025, and the **mode of investigation** determined by the SPCC following triage. Triage involves the following as highlighted in the key:

- **invalid referral:** a referral that does not satisfy the criteria set out in the regulations
- **stayed:** refers to matters where the SPCC is awaiting the outcome of related Home Office police force proceedings before a decision can be made
- **sent back:** a referral that is returned to the AA because the referral does not fall within the remit of the Service Police complaints system (for example, if it is not a complaint against a Service Police member or is outside the scope of the regulations), and therefore up to the AA to determine how to handle the matter
- **local investigation:** an investigation conducted by the AA itself, rather than by the SPCC
- **independent investigation:** an investigation undertaken directly by the SPCC where the seriousness of the case and the public interest make it appropriate

Figure 5 shows SPCC referrals: 27 mandatory referrals, five voluntary referrals, and one other referral which was neither mandatory nor voluntary, making 33 referrals in total.

In respect of the 20 mandatory referrals where the appropriate form of investigation fell to be determined, the SPCC determined there should be a local investigation by the AA in 15 cases and an independent investigation by the Commissioner in five cases. In contrast, four out of five voluntary referrals were retained by the SPCC for independent investigation. Overall, the SPCC decided to undertake nine independent investigations in 2025 (five mandatory and four voluntary). This was down from 14 independent investigations in 2024. This represents a decrease from 45% of total cases in 2024 to 27% of total cases in 2025. This report has not undertaken a detailed analysis of the drivers of this change. These figures should also be considered in the wider context of case volumes across the complaints system. While logged and recorded cases increased in 2025 (figures 7 to 9), the volume of referrals to the SPCC remained broadly stable.

Nature of referrals and mode of investigation

In respect of mandatory referrals where a local investigation was determined to be appropriate, allegations with a connection to sexual offending accounted for the largest single category (eight of 15 cases).

However, these referrals included allegations of behaviour comprising a sexual offence, together with complaints relating to dissatisfaction with how a sexual assault matter was handled by the Service Police. **These are plainly distinct categories of behaviour and are not grouped together for analytical purposes elsewhere in the report.** They are described together here solely to explain the make-up of mandatory referrals returned for local investigation, rather than to suggest similarity in substance or seriousness.

Given the small numbers within each allegation category described above, and to protect anonymity, more granular breakdowns are not provided (particularly for sensitive allegations). Under the regulations, the decision as to the appropriate form of an investigation is based on an assessment of the seriousness of the matter and the public interest. It may be appropriate for the AA to investigate a serious matter on its own behalf (local investigation). However, the public interest may favour an independent investigation by the Commissioner if a matter requires independent scrutiny because, for example, a local investigation may give rise to a perceived conflict of interest.

Accordingly, across both mandatory and voluntary referrals, allegations involving misuse of authority, conduct on duty, or workplace behaviour were more likely to be retained for independent investigation. This reflects the SPCC's focus on core policing matters and helps ensure that independent investigative resources are used efficiently.

Challenges and mitigation

In 2025, the Office of the SPCC met three of the four KPIs on triage assessments. The remaining KPI related to the Commissioner's decision on the appropriate mode of investigation (within 10 working days). This target was met in 44% of non-DSI referrals and in 100% of DSI referrals.

In one non-DSI referral, the SPCC could not make an informed determination until further information was received from the AA. More broadly, changes in Commissioner during the year affected continuity and contributed to delay. In addition, given the Office's limited capacity and the complexity of some triage decisions (including resolving regulatory issues and addressing gaps in submissions from AAs), there may be a reasonable justification for narrowly missing a KPI, while ensuring decisions remain fair, proportionate and robust.

The principal challenge remains completion of investigations within 12 months. In 2025, referrals to the SPCC were broadly stable. Reviews increased from one to four which limited investigator capacity. Together with administrative and decision-making delays, this affected timeliness. These factors, together with the availability of parties, can extend investigation timelines.

Mitigation activity is focused on strengthening case management and reducing process bottlenecks. The SPCC is progressing implementation of a digital case management system and the ongoing training for PSD staff and investigators on the SPCC Regulations. In addition, the SPCC is reinforcing working arrangements with PSDs and other stakeholders to improve information sharing, including named points of contact for file requests.

Next steps

To ensure the continued delivery of fair, independent, and timely outcomes, the SPCC will focus on the following key initiatives:

Technology

- The SPCC will continue to embrace technology to optimise workflows and improve efficiency by leveraging the MOD's infrastructure and its AI capabilities in an appropriate way.
- The SPCC is progressing the implementation of a digital case management system to streamline tracking and management of referrals, and to improve timeliness. This builds on the need for improved case management highlighted in the SPCC's first and second annual reports.

Workforce planning

- The SPCC recognises the importance of its people and will (subject to budgetary constraints) prioritise workforce planning to ensure it has the right number of skilled staff to meet increasing demands. This will help deliver the high standards of service delivery expected by stakeholders.

KPIs and refining targets

- To reflect the varying complexity of cases, the SPCC has introduced bespoke targets and will keep this under review. For example, on a case-by-case basis, straightforward cases will be managed to shorter timelines, while more complex cases may still be allocated the 12-month deadline.

Feedback and continuous improvement

- The SPCC will actively seek feedback from complainants, respondents and other stakeholders, and use it to improve guidance, communications and case-handling processes. The SPCC's internal complaints process, among other channels, will also be used to identify any recurring issues and ensure the Office remains transparent, fair and responsive.
- The SPCC will strengthen assurance governing voluntary referrals to ensure they are made in all appropriate cases. This will rely on analysing themes from applications for review and their outcomes, and dip-sampling recorded cases that were not referred, when resources allow.

Chapter 2 recommendation

1. Strengthen SPCC's capacity to improve timeliness

The MOD should support the SPCC to increase the capacity and capability of its independent investigative function by ensuring appropriate resources are funded, allocated and equipped to enable improved operational resilience, timeliness and performance.

Chapter 3:

Identifying and sharing learning for continuous improvement



Strategic objective 2: Identify and share learning for continuous improvement. Continuously improve Service Policing by identifying and sharing learning and delivering internal improvements in the SPCC's own processes.

Context

In the 2024 annual report, the SPCC committed to strengthening how learning is identified and shared across the Service Police. This included delivering workshops to support the development of the SPCC's Statutory Guidance and engaging with Service Police Professional Standards Departments (PSDs), Provost Marshals and other stakeholders. As a result of changes in Commissioner some planned activity was delayed. This included engagement with Service Boards, dip-sampling, and work to strengthen anti-corruption oversight.

Throughout the year the SPCC continued to promote learning through routine engagement with PSDs, discussion at monthly meetings with Provost Marshals, and internal learning activity with SPCC investigators. These forums helped maintain consistency and reinforce good practice during a period of organisational change. The publication of the SPCC Statutory Guidance also consolidated learning in a single place, providing stakeholders with an accessible and authoritative reference point.

This chapter also reflects the Provost Marshals' perspectives on the steps they have taken to support continuous learning. The SPCC has reviewed how each Service Police force identifies and shares learning, and the findings are set out in the data insights that follow.

Data insights: 2025 performance

Analysis of PSDs' continuous improvement

Evidence from each Provost Marshal shows that during 2025 all Service Police forces and the Defence Serious Crime Command (DSCC) have taken steps to strengthen organisational learning, although maturity levels vary. In simple terms, some forces have more structured ways of capturing and acting on lessons than others. Some forces have developed structured approaches – such as action plans, reflective practice processes, and organisational learning boards – while others are at an earlier stage of development.

- **The Royal Navy** supports learning through action plans and multiple channels for sharing information, though evaluation of impact requires strengthening. In addition, the Royal Navy supports organisational learning using reflective practice, organisation-wide briefings and continuous professional development. In 2025, the RNP transferred one of their PSD staff to the DSCC PSD to provide enhanced independence to investigations into police misconduct across the Royal Navy and contribute to the development of a counter-corruption capability for the Service Police.
- **The Army** has established governance and reporting structures aligned to the PM(A) Performance Management Framework, providing regular oversight of investigative activity, lessons and supporting senior assurance of performance.

- **The RAF PSD** is advancing continuous improvement through the introduction of Reflective Practice, providing a proportionate, learning-focused approach to addressing minor professional failings. This enables the RAF Police to identify emerging trends that inform policy, training, and professional development. PSD Ambassadors are also being established across the Force to enhance understanding, reassurance, and trust in PSD processes. Together, these initiatives support a positive culture centred on learning, transparency, and continuous improvement.
- **The DSCC** has more established governance, including organisational learning boards and performance groups.

It should be emphasised that the information presented above is based on qualitative information provided by PSDs in response to a structured data request, which has not been independently verified. The SPCC is reliant on the accuracy, completeness, and consistency of information reported by PSDs, which may vary in level of detail and interpretation. As such, findings should be interpreted as indicative rather than comprehensive.

A review of the responses to the data request suggests that the strongest learning arrangements are found where forces have clear governance structures, routine forums and established routes for sharing information. These features make it easier to identify recurring issues and to link learning to decisions and action. Areas for development remain where processes are informal or under-defined, where ownership is unclear, or where there is limited evidence that learning leads to measurable or sustained change. Strengthening evaluation will be important if forces are to show that learning is improving outcomes over time.

KPI for continuous improvement

Figure 6 sets out the KPIs used to assess progress against **Strategic objective 2: Identify and share learning for continuous improvement**. This KPI measures whether the SPCC is putting learning into practice, including through planned workshops and by recording, tracking and following up agreed actions. Tracking learning and follow-up are important to ensure that lessons are embedded (not just identified) and that improvements can be evidenced over time. The information below summarises learning activity delivered in 2025.

In February 2025, the SPCC held a workshop at RAF Northolt, hosted by the Service Prosecuting Authority. This included an initial consultation with the Provost Marshals and their legal representatives to gather input on the draft SPCC Statutory Guidance. In May 2025, the SPCC ran a stakeholder roadshow and workshop, attended by Provost Marshals, PSDs and other key stakeholders, which provided broader workshop-style engagement on the Statutory Guidance. In August 2025, the SPCC delivered a formal internal training programme over one and a half days covering investigators' powers, data handling and lessons learned from live investigations. All events documented outcome and actions so they could be monitored.

Figure 6: KPI for continuous improvement

Description	Target	Supporting data	Outcome
Ensure continuous improvement via interactive workshops	Target: Biannual workshops held with lead investigators and external stakeholders (e.g. Service Police, MOD)	One internal workshop for SPCC investigators and a separate workshop with the RAF	Met
		Two workshops on the SPCC Statutory Guidance	Met

Internal workshop

In August 2025, the SPCC delivered an internal workshop to strengthen staff capability and support continuous learning. The session focused on clarifying investigative powers, improving handling of digital and physical evidence, and reinforcing key principles set out in SPCC guidance.

Following discussion with independent counsel, several targeted actions were agreed:

- the development of Memoranda of Understanding with each Service Police force to improve the timeliness of investigations and streamline the 28-day update process
- additional workshops to build understanding of alternative procedures within the Service Justice System, including opportunities to observe Court Martial proceedings
- a review of SPCC Regulations to assess whether the current legislative framework enables investigators to refer cases to the Director of Service Prosecutions effectively

This workshop demonstrated how internal learning can directly shape improvements in SPCC processes, capability and oversight. This will help ensure that investigators are equipped to deliver fair, timely and well governed outcomes. Investigators were asked for feedback on the events to ensure the lessons met their needs.

Improving participant welfare support (learning into practice)

For the purposes of this report, “participants” means complainants; the person to whose conduct the investigation relates (the respondent); witnesses; and family members involved in the process, for example, in death or serious injury (DSI) matters.

In accordance with Joint Service Publication 770 (Armed Forces Welfare Support Policy), welfare support is a command responsibility. The Commanding Officer, through the Chain of Command and supported by specialist advisors and welfare staff, is responsible for providing welfare support to unit Service personnel and the wider Service community, including those who are under investigation or subject to administrative action.

Feedback from complainants, respondents and Provost Marshals nevertheless highlighted the impact that investigations can have. A few participants also said they did not want to use MOD-affiliated welfare support and valued having an independent option. In response, the SPCC is introducing an independent participant welfare support service for those involved in SPCC investigations. The SPCC's independent participant welfare support service therefore is not intended to replace, duplicate or assume PM/Chain of Command welfare responsibilities. Instead, it provides an additional, independent source of support, including for those who are not entitled to the Employment Assistance Programme.

The service will run in parallel to existing welfare support that is available through the Armed Forces for serving personnel. It will also be open to participants in SPCC investigations, including veterans. Support will be provided confidentially by trained caseworkers. To protect confidentiality and avoid conflicts of interest, the same caseworker will not support both the complainant and the respondent in the same case. No individual case details will be shared with the SPCC. This separation is intended to preserve independence and to give participants confidence to seek support without concern about any impact on their case.

Challenges and mitigation

This section concludes on how learning is captured, tracked and translated into changes in practice, both within the SPCC and across the Service Police. In 2025, based on information provided to the SPCC by Provost Marshals and the PSDs, the SPCC assessed that a key challenge was the evaluation of the learning plans and outcomes. PSDs reported a range of learning activity, but maturity varied between forces, and it was not always clear how learning was captured and translated into measurable change.

A further challenge was embedding the SPCC's Statutory Guidance with senior stakeholders who do not routinely engage with the Service Police complaints process, including Single Service Boards and wider Defence governance. This did not happen as planned because of the changes of Commissioner during the year. The communication strategy was to explain why the guidance matters, address misconceptions, and show how effective oversight supports wider Defence priorities, including recruitment, retention and reform. Changes of Commissioner also affected planned dip-sampling work and improvements to anti-corruption oversight.

To mitigate this, the SPCC maintained learning-focused engagements through existing forums and used an action tracker and structured data requests to build a clearer baseline of current learning arrangements.

The SPCC also identified that the handling of complaints and conduct matters was not consistent across the forces. The publication of the Statutory Guidance provided a clearer baseline for consistent practice. It has also highlighted where additional guidance is needed. For example, the SPCC has been developing a Service Police referral form to help ensure referrals are made under the correct Regulations. As noted above, the analysis in this chapter is based on qualitative information provided by PSDs which has not been independently verified. Mitigation will therefore focus on strengthening governance and measurement, including clearer expectations for how forces evidence learning, and more consistent management information to support comparison over time.

Chapter 3 recommendation

2. Formalise organisational-learning structures across the Service Police

MOD should sponsor a programme of senior-level briefings, including Single Service Boards and other Defence governance bodies, to embed shared understanding of the Statutory Guidance and the underlying Regulations. MOD should also establish a clear route for stakeholders to raise points of interpretation and operational friction. These points can be captured, resolved and, where necessary, reflected in future updates to the Statutory Guidance.

Next steps

In 2026, organisational learning will be a standing focus of the SPCC Management Board. This will allow progress to be monitored routinely, ensure that learning is translated into actions with measurable outcomes, and provide stronger assurance of consistent practice across the Service Police. The SPCC will also use established forums, including monthly meetings between the SPCC and Provost Marshals, and quarterly catch-ups between PSDs and the Office of the SPCC. This will enable tracking of delivery and sharing of effective practice across forces.

Taken together, these actions are intended to strengthen the maturity, visibility and impact of organisational learning across the Service Police.

Chapter 4:

Increasing awareness and transparency of the SPCC



Strategic objective 3: Increase awareness and transparency of the SPCC. Improve confidence in Service Police accountability and ensure that complainants understand their right to complain and that they can expect to be treated fairly and justly. Ensure that Service personnel, civilians and other stakeholders understand the SPCC's role in dealing with complaints, police conduct, death or serious injury (DSI) matters, reviews and super-complaints.

Context

Increasing awareness and transparency of the role of the SPCC is essential to strengthening confidence in Service Police accountability. This objective ensures that Service personnel, civilians, and other stakeholders are aware and understand the SPCC's role, including how complaints, conduct matters, DSI cases, reviews², and super-complaints are handled. This was anchored by the development and publication of the SPCC's Statutory Guidance.

In 2025, the SPCC continued to enhance transparency through regular engagement with Provost Marshals, but also participation in wider Defence events. Furthermore, the assessment of a super-complaint during the year also demonstrated how the SPCC operates openly when issues of wider public interest arise.

The data that follows shows how these activities affected referral patterns, enquiry volumes, and engagement levels. In plain terms, the figures show what demand looked like and how people used the system. While increases in the numbers of cases logged and recorded indicate higher overall demand on the system, they do not necessarily mean dissatisfaction with Service Police has increased. As shown in **figure 14**, the proportion of logged cases categorised as dissatisfaction with ineffective investigation

fell between 2024 and 2025, alongside increases in other categories. The increase in logged and recorded volumes may therefore reflect a combination of factors, including changes in the types of cases being raised and increased awareness of the Service Police complaints system. As the data cannot separate these factors, the figures should be interpreted with caution.

Data insights: 2025 performance

Note: The figures in this section are included to support transparency. Some show logged cases only, some compare logged and recorded cases, and others summarise case outcomes. Please read each figure title carefully, as these measures are not the same.

2 Where a complaint has been recorded, the complainant has a right to apply for a review of the outcome. The review will consider whether the outcome of the handling of the complaint was reasonable and proportionate.

Figure 7 shows the number of cases logged by each Service Police Professional Standards Departments (PSDs) in 2024 and 2025. This helps stakeholders understand the overall scale of demand and how it is distributed across the Service Police forces and the Defence Serious Crime Command (DSCC). This figure shows an increase in logged cases compared with 2024 across all forces, with the largest rise occurring within the DSCC. When data is combined across the Service Police forces, there is an overall increase in the number of cases logged.

Figure 7: Number of cases logged by PSD, 1 January 2024 to 31 December 2025

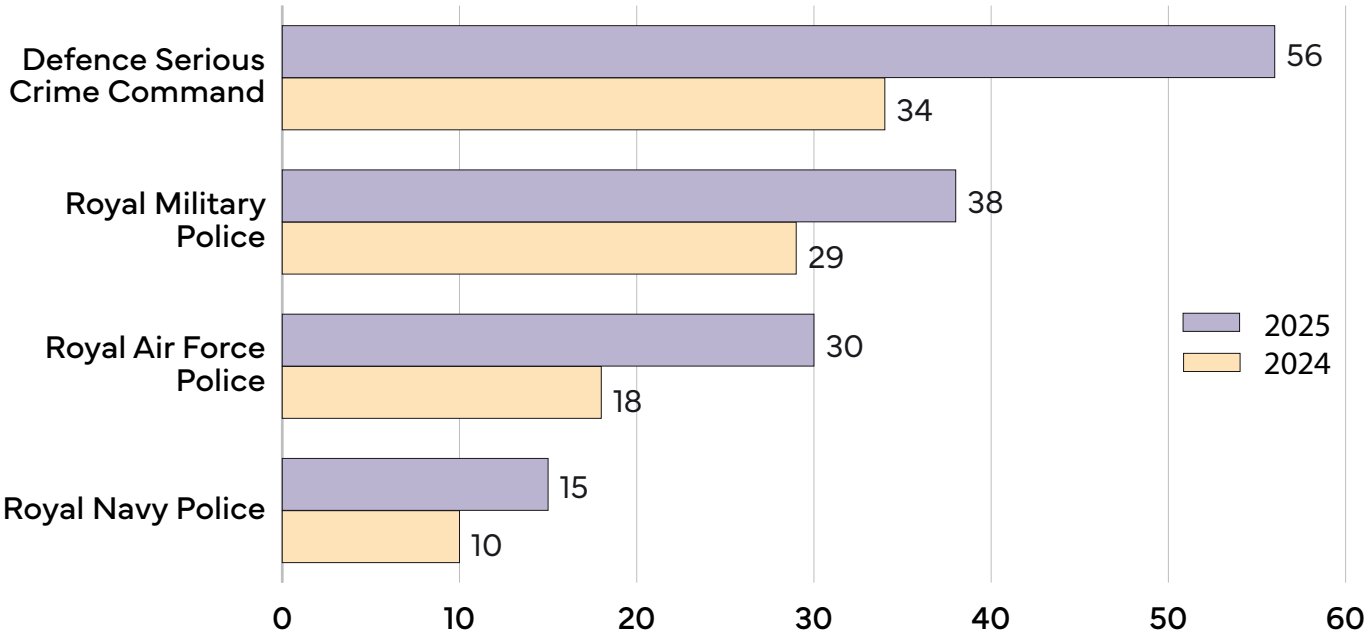


Figure 8: Number of cases logged by PSD, and how many of these became SPCC referrals, 1 January 2025 to 31 December 2025

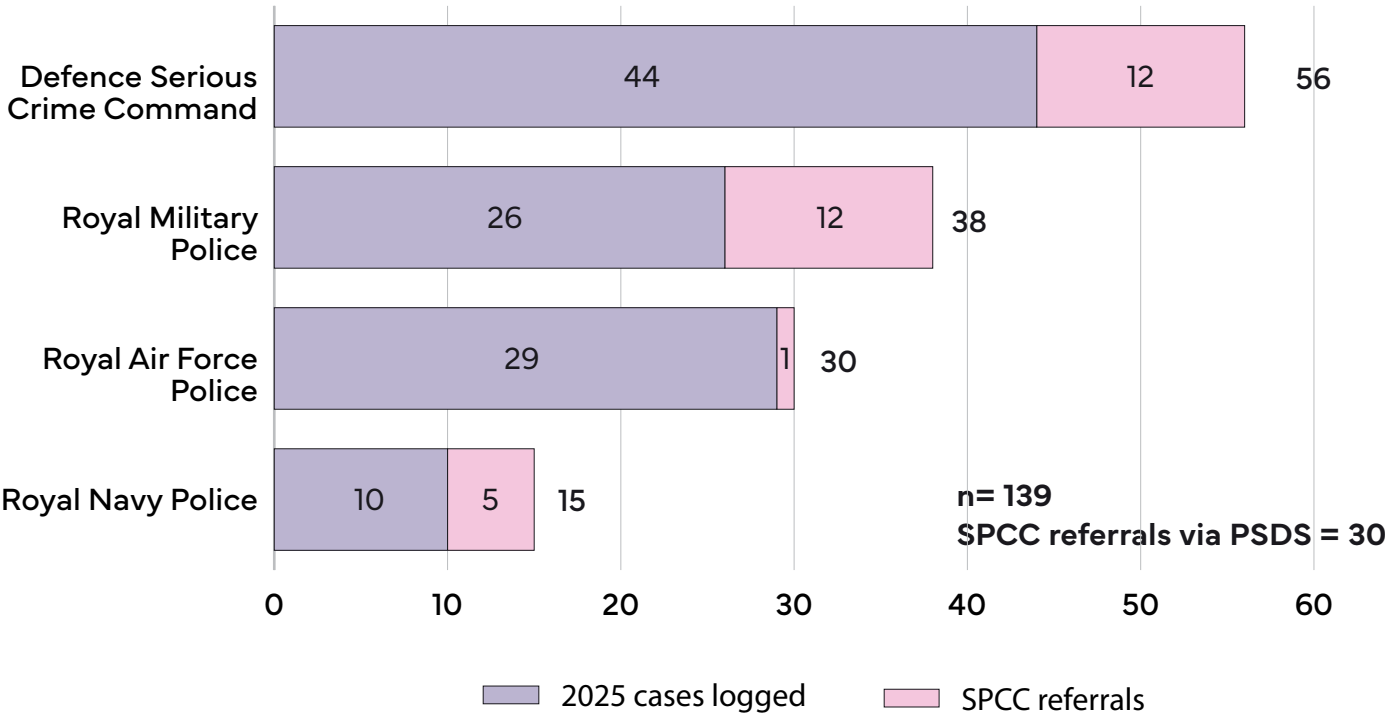


Figure 8 shows the proportion of cases referred to the SPCC, broken down according to each Service Police Force and the DSCC. For broader context on Service Police and PSD workforce capacity, see Figures 18 and 19 later in this report. Figures 18 and 19 show that workforce size does not translate directly into SPCC submissions: the RAF has the second largest Service Police strength, it generated the lowest number of referrals in 2025.

Figure 9 shows the total number of cases logged and recorded each year. It distinguishes between cases that engaged the statutory framework and those that were logged but did not advance further.

Figure 9: Number of cases logged and recorded, 1 January 2024 to 31 December 2025



Figure 10: Definitions for each outcome category logged by PSDs

The outcome definitions in figure 10 are provided to assist the interpretation of figure 11 (below), which explains the outcomes of the 139 cases logged by the PSDs during 2025. These definitions were agreed with PSDs for consistency of annual reporting. They apply to all cases logged by PSDs, not just complaint outcomes.

Outcome	Type	Definition
Upheld	Misconduct outcome	The complaint was found to be valid, and the allegation was supported by evidence. Disciplinary or learning opportunities may follow, depending on the severity.
Partially upheld	Misconduct outcome	Some parts of the complaint were proven, but not all aspects. There may still be some form of action or recommendation.
Stayed	Misconduct outcome	The investigation or complaint process has been paused or suspended, often due to legal reasons (e.g. ongoing criminal proceedings) or other priorities.
Not upheld	Misconduct outcome	The complaint was not supported by the evidence, or it was found to be unsubstantiated. No misconduct or breach of standards was identified.
Local resolution	Misconduct outcome	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.
Guilty	Criminal outcome	This refers to a finding or plea of guilty in criminal or disciplinary proceedings.

Outcome	Type	Definition
Charged	Criminal outcome	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 (AA).
Referred	Criminal outcome	The complaint or matter has been passed on (referred) to another Appropriate Prosecutor for further action because the case has met the Evidential Sufficiency Test (which is a test applied by the Service Police before a matter can be referred to the Appropriate Prosecutor). A referral does not mean that an individual has been charged with an offence, but that the matter has been passed to the AA for consideration of charge.
No further action	NA	The matter was investigated but no action is being taken, or the complaint does not, on initial interpretation, 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.
Other/withdrawn	NA	A miscellaneous category when the outcome does not fit neatly into the above. This might include reasons like referrals to other bodies or internal actions not classified under the standard outcomes.
No outcome, as still ongoing	NA	The investigation is not yet complete, so no decision has been made about whether the case is upheld or not.

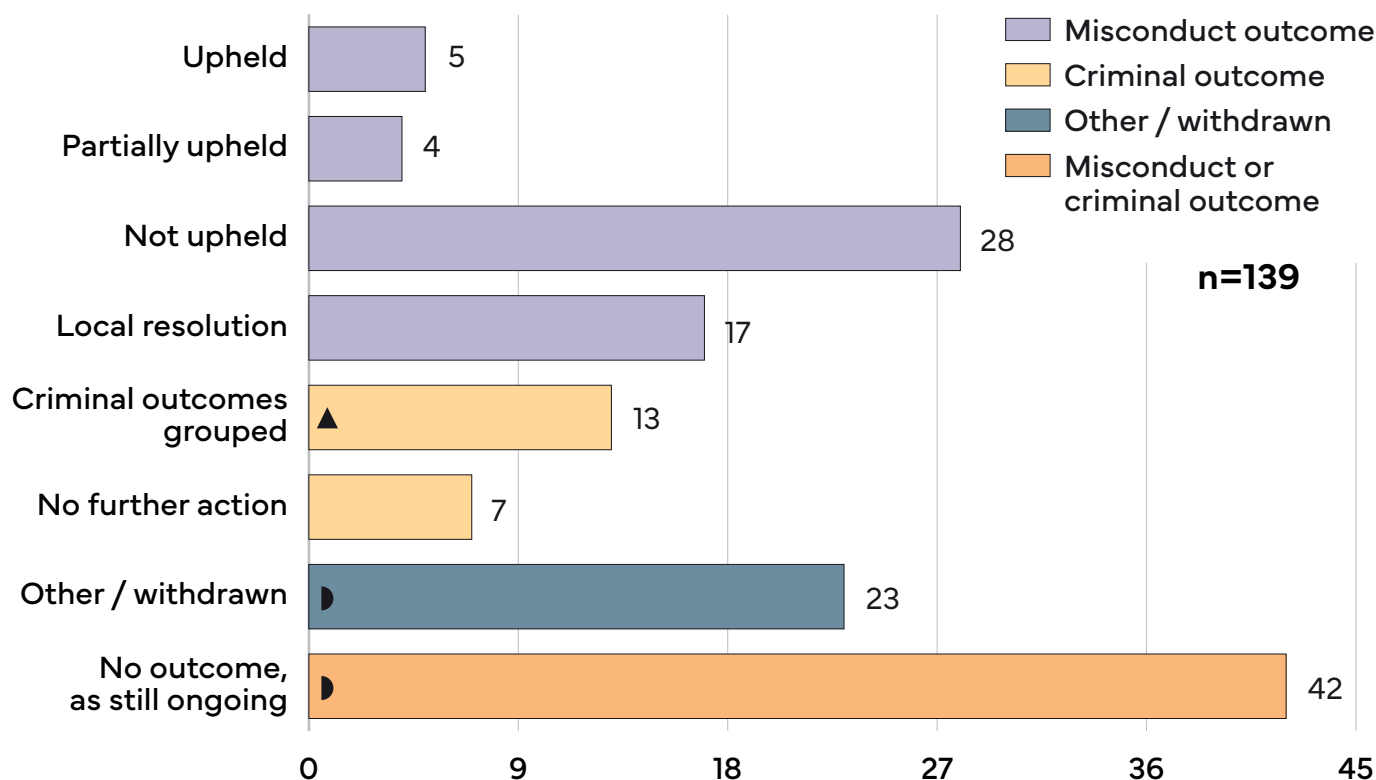
Figure 11 shows the outcomes at the end of the reporting period for the 139 cases logged by the PSDs during 2025. As individual cases can be sensitive, the chart summarises outcomes at a high level without disclosing details of individual cases.

The dataset encompasses a variety of outcome categories, such as upheld, partially upheld, stayed, local resolution, guilty, charged, referred, no further action, other/withdrawn, and ongoing (no outcome yet). The 'ongoing' category is noteworthy, highlighting a substantial number of cases that have yet to reach a conclusion. The continued prevalence

of 'not upheld' outcomes, combined with the presence of unresolved cases, demonstrates a consistent pattern in how investigations are finalised and how many remain open at the time of reporting.

Figure 11 does not show what action (if any) followed, such as disciplinary or administrative action. In 2025, the largest outcome category (excluding cases still in progress) was 'not upheld', indicating that the evidence did not support the complaint or allegation. This continues the pattern seen in 2024, suggesting the overall approach to reaching outcomes has remained broadly consistent.

Figure 11: Number of cases logged by outcome and type, 1 January 2025 to 31 December 2025



- ▲ 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, some case types have been grouped.

SPCC case determinations

This section summarises the determinations made at the end of independent investigations completed in 2025. By reflecting the data, it supports transparency about how the SPCC uses its independent investigation powers. **Figure 12** distinguishes between cases referred as mandatory referrals and those received as voluntary referrals from AAs.

During 2025, the SPCC managed nine independent cases within its remit and concluded **six (figure 12)**. In three of the concluded cases, the SPCC determined that there was a case to answer for misconduct or gross misconduct. In the other three concluded cases, the SPCC determined that there was no case to answer. Although Figure 12 shows the Commissioner’s determinations it does not show what action (if any) was taken afterwards by the Appropriate Authority, including administrative action. Even where the determination is that there is no case to answer the process can still identify learning for the AA and the wider system. To maintain confidentiality, and in line with Joint Service Publication 200 guidance on statistical disclosure control, numbers below three are not disclosed.

Figure 12: SPCC case determinations

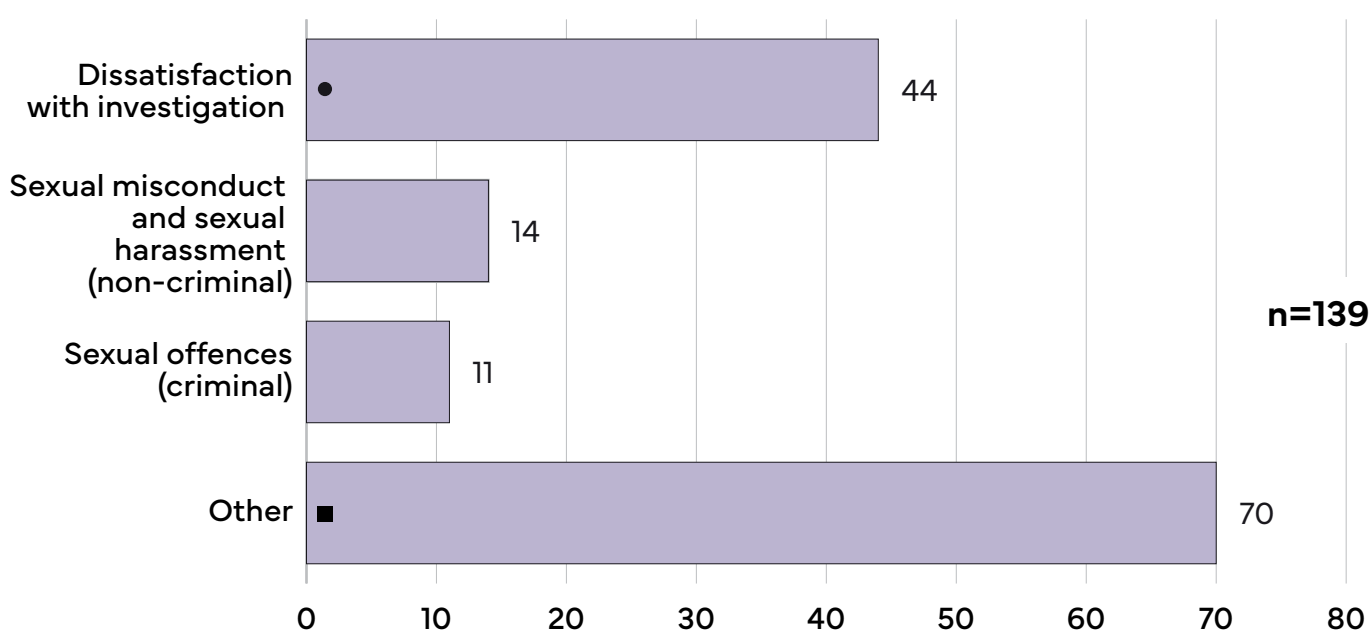
Type of referrals	Determinations	Number	Percentage
Voluntary	Case to answer for misconduct or gross misconduct	3	50%
Mandatory	No cases to answer	3	50%

Figure 13 shows how cases were logged according to whether they fell into one of three specific categories of conduct or were categorised as 'other'.

The 'other' category is excluded from the year-on-year comparison because its sub-categories differ between 2024 and 2025 (**figure 13**). Due to this inconsistency, the figures are not directly comparable.

Although there was a decrease in cases in the 'ineffective investigation' category between 2024 and 2025, there is currently no evidence to determine whether this reflects changes in processes or case handling. Therefore, caution should be exercised when drawing any conclusions about cause and effect.

Figure 13: Number of cases logged by nature of complaint, 1 January 2025 to 31 December 2025

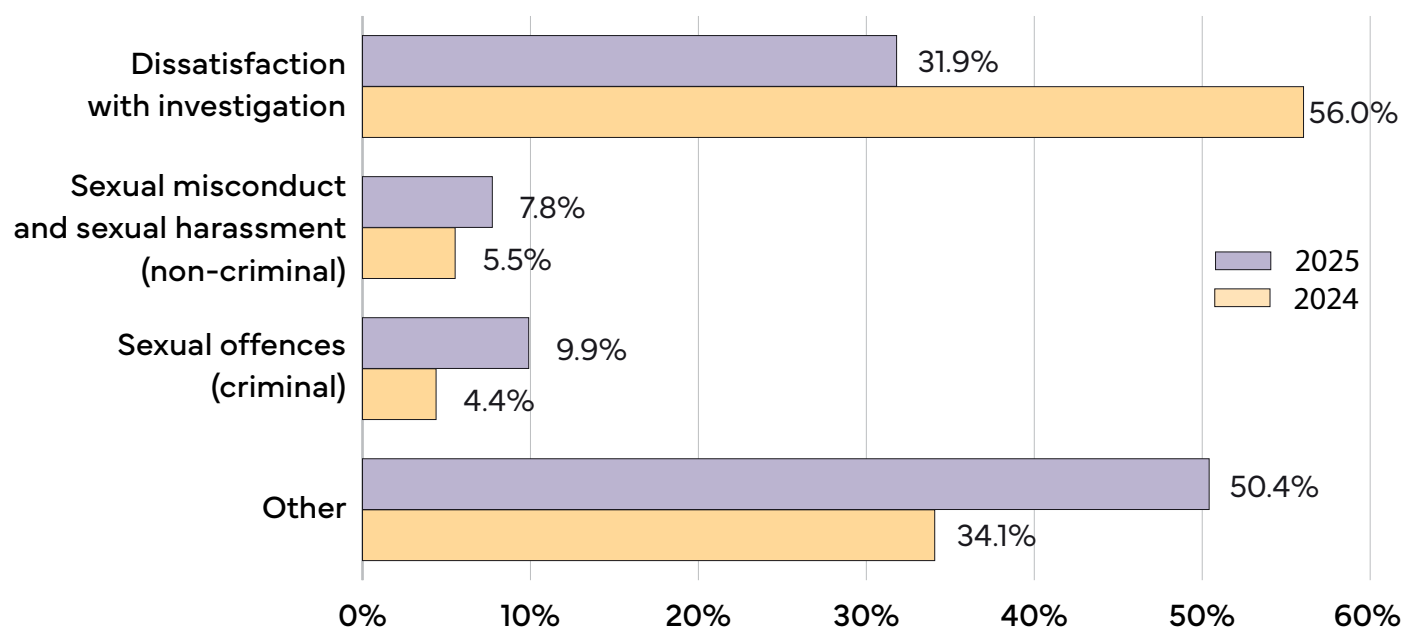


- Dissatisfaction with investigation may include reasons such as conduct during arrest, illegal interview, lack of investigation updates and lack of victim updates.
- In line with the JSP 200 directive on statistical disclosure control, numbers fewer than three have been suppressed. These categories have been grouped together as 'Other'. This includes 'Discrimination or Equality Act', 'Fraud', 'Harassment', 'Domestic Violence', as well as those which fall outside the listed categories.

Figure 14 shows how the distribution of logged cases by category changed between 2024 and 2025. The proportion of logged cases categorised as dissatisfaction with ineffective investigation decreased from 56.0% to 31.7%. Over the same period, the proportion of sexual

offences (criminal) increased from 4.4% to 10.1% (a rise of 5.7 percentage points), and sexual misconduct and sexual harassment (non-criminal) increased from 5.5% to 7.9% (a rise of 2.4 percentage points). These are notable increases.

Figure 14: Distribution of logged cases, by category, 2024 and 2025



The category 'other' has been included in this comparison, however, the underlying sub-categories differ between 2024 and 2025, so it is not directly comparable.

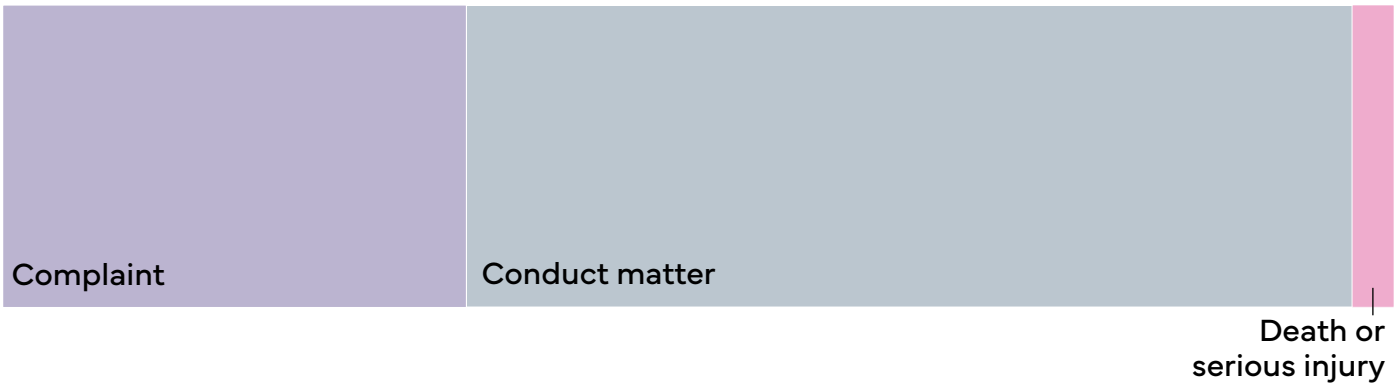
This visual shows the distribution of cases according to where the conduct giving rise to the case occurred. Defence operates worldwide, so a proportion of complaints relate to incidents and/or conduct matters that occurred overseas. In this dataset, **30 of 139 cases** (about 22%, or just over one in five) relate to overseas events.

Figure 15: Number of cases logged by locations, 1 January 2025 to 31 December 2025



Figure 16* shows that, in 2025, the SPCC received around twice as many referrals relating to **conduct matters** as **complaints** (see definitions in chapter 2). The difference in volumes therefore points to different routes into the system, not necessarily differences in seriousness.

Figure 16: Indicative proportions of SPCC referrals logged by type of matter, 1 January 2025 to 31 December 2025



*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. Segment widths are drawn proportionally to represent the relative distribution of cases and should be interpreted as indicative rather than exact.

KPI for awareness and transparency

Figure 17 summarises performance against the KPIs for awareness and transparency in 2025, including strategic engagement activity and timeliness of Freedom of Information (FOI) responses. The narrative below provides context on the engagement activity delivered during the year.

Key engagement activity during 2025 included:

- a dedicated briefing to RAF Personnel Casework Unit caseworkers on **5 June 2025**, focusing on the SPCC’s role and its interaction with disciplinary procedures
- a contribution to the Raising Our Standards event for UK Strategic Command (now Cyber & Specialist Operations Command) stakeholders on **10 July 2025**, alongside senior leaders
- meetings with the DSCC on **17 December 2025** and **5 June 2025** and the RNP on **4 June** and **13 November 2025**

- engagement with RAF Provost Marshal and PSD colleagues on **18 June 2025**
- engagement with the Army PSD on **21 May 2025**
- engagement with the Judge Advocate General on **12 June 2025**
- attendance at the Royal Navy Black History Month event on **23 October 2025**

Further strategic engagements were planned with the Navy Board, Army Board, RAF Board and the Defence Council to spotlight the development and publication of the SPCC’s Statutory Guidance. However, these briefings did not take place during the reporting year due to the change of Commissioner, although preparatory work continued.

Figure 17 also sets out performance against the Freedom of Information (FOI) KPI (responses within 20 working days). This provides a measure of statutory compliance alongside engagement activity.

Figure 17: KPI for awareness and transparency

Description	Target	Supporting Data	Outcome
Improve understanding of the SPCC’s statutory role among Service Police and Defence senior stakeholders through strategic engagement.	Carry out up to four strategic engagement activities with senior Service Police or Defence governance bodies during the reporting year.	At least eight strategic engagements took place in the calendar year.	Met
Respond to FOI requests in line with statutory requirements.	100% of FOI requests responded to within legislated timeframes (20 days).	66% (2 of 3 FOIs)	Not met

Super-complaint: Transparency in practice

Super-complaint: Service Police access to victims' work emails and internet browser history

In August 2025, His Majesty's Chief Inspector of Constabulary (HMCIC) received a super-complaint from the Centre for Military Justice. The super-complaint raised concerns about Service Police gaining access to victims' MOD work email accounts and internet browser histories during investigations, without the knowledge or consent of the victims.

In October 2025, HMCIC and the SPCC jointly assessed the super-complaint and determined that it was eligible for investigation. The decision to investigate, together with the published Terms of Reference, set out clearly the scope of the investigation and the issues to be examined. This ensured transparency regarding how the super-complaint process operates and the respective roles of HMCIC and the SPCC in considering matters of wider public interest.

The handling of the super-complaint demonstrates how transparency supports confidence in Service Police accountability. Publishing key information about the assessment and investigation process should help to ensure that oversight activity is visible and open to scrutiny, particularly where sensitive issues and public confidence are engaged. It also helps to improve understanding of what happens when a super-complaint is made.

For further details on the super-complaint please go to:

<https://hmicfrs.justiceinspectorates.gov.uk/publications/terms-of-reference-super-complaint-on-the-service-polices-access-to-victims-work-emails-and-internet-browser-history/>

Publication of the SPCC Statutory Guidance: Transparency in practice

The SPCC's Statutory Guidance consolidates and builds on JSP 849 Parts 1 and 2, removing duplication. Most importantly, it clarifies areas where previous material lacked detail and fills gaps not covered by the JSP. It is structured into five parts covering:

- the principles of the complaints system
- initial handling
- investigation and handling of conduct matters and DSIs
- the right to review
- general roles and responsibilities

Annexes provide definitions, flowcharts, and a summary of the super-complaints process.

A key improvement is the clearer explanation of the right to review. The guidance makes it explicit that complainants may apply for a review within 28 days of the conclusion of the investigation carried out by the AA on its own behalf, or of any other handling of their complaint. In addition, the guidance makes clear that reviews are not reinvestigations but independent assessments of whether the outcome of an investigation was reasonable and proportionate. It also clarifies which bodies conduct reviews – SPCC, Defence Council or Service Boards – and emphasises the need for impartiality.

Alongside the full guidance, the SPCC produced an executive version highlighting key takeaways and updated the Service Police Complaint Form to improve accessibility. The Statutory Guidance was circulated to internal and external stakeholders and will be published on the SPCC website once operational. Since publication, stakeholders have reported a clearer understanding of their rights and the review process, supporting greater confidence and awareness across the system.

Provost Marshals and Professional Standards Departments

Routine engagement with Provost Marshals and PSDs remained central to promoting awareness and transparency in 2025. These forums helped ensure a consistent understanding of the SPCC's remit, referral requirements, and oversight processes, while providing opportunities to clarify questions about regulatory interpretation and expectations.

Through this engagement, the SPCC also gained valuable insight into the experiences of complainants, respondents, witnesses, and families involved in investigations, especially in complex cases such as those involving DSI. This feedback informed improvement activity described in chapter 3.

Challenges and mitigations

This section focuses on stakeholder awareness of the SPCC's role and the transparency and accessibility of information about the complaints system. In 2025, the SPCC worked with stakeholders throughout the year to develop and prepare the Statutory Guidance, which was published in December, and to prepare supporting materials to aid implementation. The SPCC also used engagement opportunities to reinforce understanding of statutory roles, including explaining to Single Service Boards when they act as a review body under the Regulations and signposting stakeholders to the guidance. Even with these steps, raising awareness across the system remained challenging. As a small office with a Defence-wide remit, the SPCC cannot rely on day-to-day contact with every stakeholder group.

Although understanding improved in 2025 through publication of the SPCC's Statutory Guidance and the distribution of clear information to internal and external stakeholders, raising awareness across the system remained challenging. Awareness therefore still depends heavily on engagement activity, and several planned sessions were postponed or cancelled due to operational pressures and competing priorities across the system. Changes of Commissioner during the year affected continuity for some planned engagements, but this was not the sole reason. However, the engagements that did take place were well attended, demonstrating strong demand for clearer direction when engagement is available.

To mitigate these challenges, the SPCC is focusing on predictable and structured engagement routes that are less affected by operational demands, such as routine meetings with Provost Marshals and PSDs. The publication of the Statutory Guidance and its executive version also provide a single, accessible reference point for stakeholders, supporting consistent understanding when in-person engagement is limited. Internal Defence channels continue to be used to share updates while work to bring the SPCC website online progresses.

Next steps

In 2026, the SPCC will build on the publication of the Statutory Guidance by reinforcing awareness of its content at every engagement opportunity. Once the external website becomes operational, the SPCC will publish the full guidance, the executive version and the updated complaint form online, improving accessibility for Service personnel, complainants, respondents and the wider public.

The SPCC will continue structured engagement with PSDs and Provost Marshals to support consistent understanding of referral expectations, complaint handling requirements and the right to review. Additional explanatory materials will be developed to help embed the Statutory Guidance across the system. These actions aim to strengthen confidence, improve awareness and ensure that all stakeholders clearly understand the SPCC's role and responsibilities.

Chapter 4 recommendations

3. Awareness (Defence Learning Environment Training)

MOD should introduce a short optional module in the Defence Learning Environment to explain the SPCC's role, remit, and processes. This will improve awareness among Service personnel and civilians, clarify complainants' rights and responsibilities, and establish a consistent baseline of knowledge.

4. Raising Our Standards integration

MOD should formally link the Raising Our Standards programme with SPCC insights and organisational-learning activities. This integration will ensure system-wide cultural improvements are informed by SPCC evidence.

5. External website assurance

MOD should accelerate the remaining cyber-security assurance work to enable the publication of SPCC materials online. This includes the Statutory Guidance, executive version, updated complaint form, and transparency materials.

Chapter 5:

Operating efficiently and effectively



Strategic objective 4: Operate efficiently and effectively. Ensure the SPCC's functions and processes are carried out efficiently and effectively.

Context

This chapter builds on the improvements in transparency and awareness described in chapter 4. It explains how the SPCC aimed to conduct its work efficiently and effectively, through clear processes, performance monitoring and financial controls. It also argues for SPCC representation on key MOD governance forums to provide information connected to the performance of the Service Police.

The Office has had to build its infrastructure and operating model after the Regulations came into force. This has involved the SPCC developing governance, case management processes and workforce capability alongside delivering its statutory functions. By contrast, established civilian police oversight bodies have evolved over extended periods. They have progressively strengthened their independence, resources and investigatory powers. The SPCC has had to operate a full statutory model from inception.

As a result, current resourcing is below what is required to discharge the full range of statutory functions under the Regulations, including activity essential to maintaining confidence in Service Police accountability. For example, the Office does not currently have the capacity to routinely dip-sample cases to assure itself that the system is working as intended. Limited capacity also affects how quickly independent investigations can be completed. This requires staff within the Office of the SPCC to cover multiple roles to meet demand.

To manage this, the SPCC has prioritised delivery of its core statutory functions and established internal controls, while continuing to build longer-term capability.

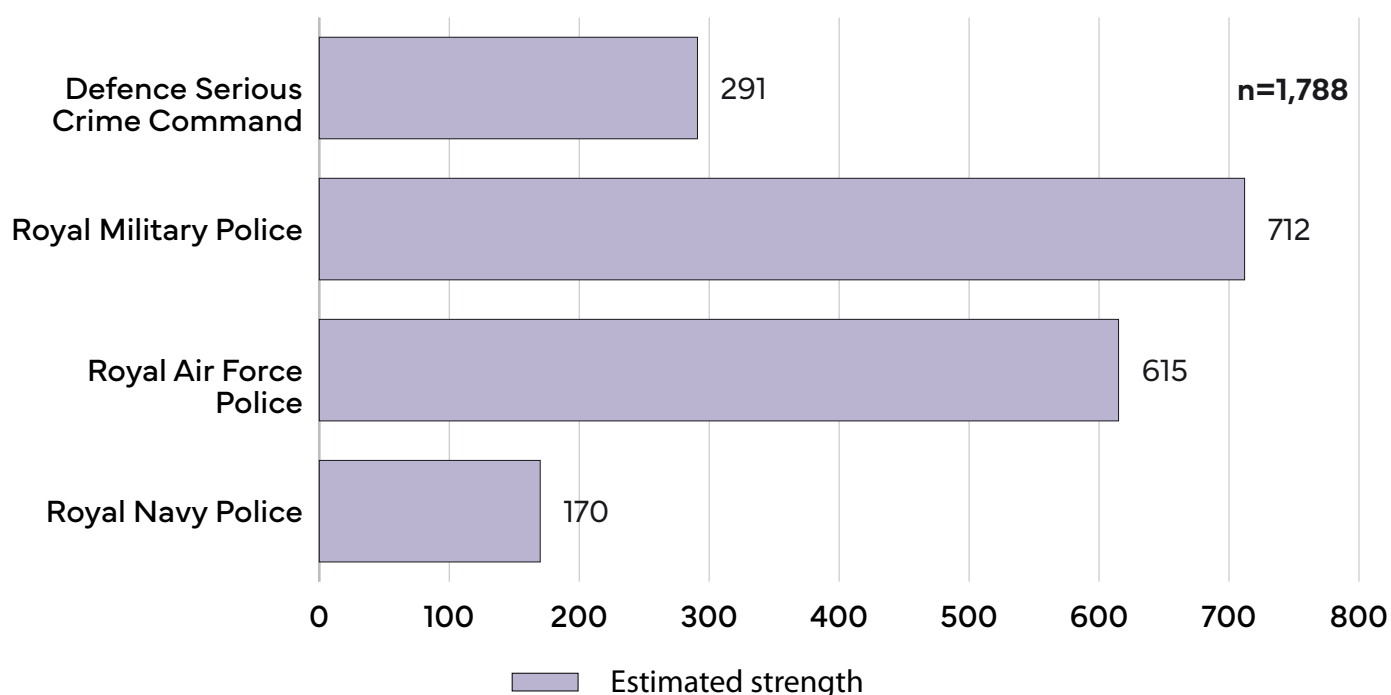
Data insights

The SPCC uses a focused set of management information to understand capacity and demand, track timeliness, and monitor expenditure.

System capacity and demand (figures 18 and 19)

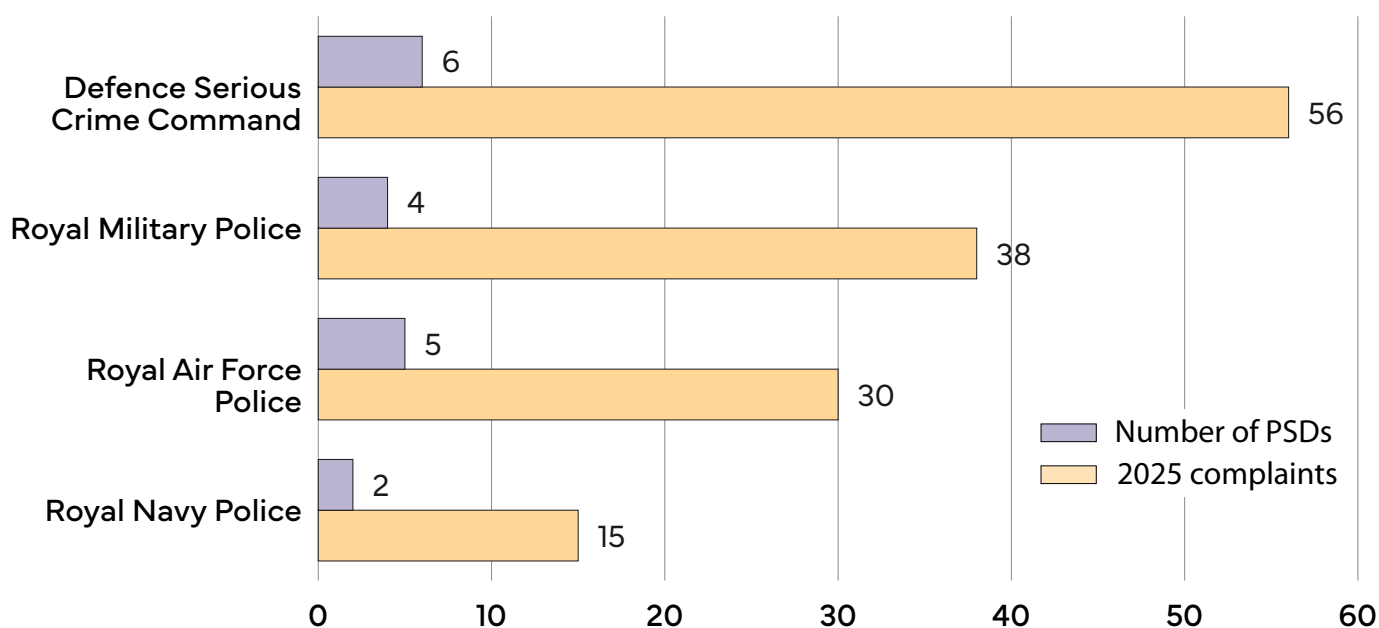
Figures 18 and 19 provide context regarding the potential scale of demand and the capacity available to manage Service Police complaints. **Figure 18** shows Service Police workforce strength across the Royal Navy, Army, Royal Air Force and the Defence Serious Crime Command (DSCC), and figure 19 shows Professional Standards Department (PSD) staffing levels alongside complaint volumes.

Figure 18: Estimated strength of Service Police forces in 2025



These figures represent an indicative snapshot of useable strength rather than fixed totals. Personnel numbers fluctuate throughout the year, so values should be interpreted as estimates that provide a general indication of relative scale rather than precise headcounts.

Figure 19: PSD staffing levels and complaints by Service Police force, 1 January 2025 to 31 December 2025



The volume of complaints varies across Service Police branches, reflecting differences in the scale of criminal and Service offence activity managed by PSDs and associated SPCC oversight.

Against this context, the next section focuses on the SPCC's own operational performance and the factors that enable or constrain timeliness, quality and workforce capability.

SPCC: Operational performance: capacity, timeliness and workforce capability

This section examines how the SPCC's operational performance is shaped by capacity, workload and the capability of its workforce. It brings together information on demand pressures, timeliness of activity, and organisational enablers that support effective and efficient delivery.

SPCC operational context: capacity and demand

Figures 18 and 19 provide context on capacity and demand across the Service Police complaints system. Figure 18 shows Service Police workforce strength across the three single Service forces and the DSCC.

No statistical analysis has been carried out to test whether force size is linked to the number of complaints or conduct matters logged and recorded. However, this could be explored in future, for example, by comparing complaints and conduct matters per officer headcount and against overall police force demand.

Figure 19 shows PSD staffing levels alongside complaint volumes across the three Service Police forces and the DSCC. However, it does not on its own show whether PSDs are coping well. To judge efficiency or pressure properly, consistent information on throughput, timeliness, case complexity and outcomes is required. **Essentially, demand and risk are not evenly distributed across the system.** As a Tri Service serious crime capability, the DSCC manages a large volume of high-harm investigations including all cases involving deaths, sexual offending, and domestic abuse. These investigations present greater safeguarding risk and often have complex evidential and welfare considerations.

These cases place sustained and significant demands on victims, witnesses, suspects and investigators. This means that simple comparisons between DSCC headcount and single Service forces who do not investigate serious or major crime are not, on their own, a reliable measure of pressure or efficiency. They do, however, reinforce the importance of aligning staffing models with observed activity and statutory expectations.

SPCC: Operational performance indicators

These indicators show how well the SPCC is managing its day to day work (timeliness, follow up, quality and workforce capability). Operational efficiency is about whether the SPCC's day-to-day processes are completed on time and to an expected standard. The SPCC therefore reports four operational KPIs to monitor:

1. timeliness of routine communications (the 28 day update requirement)
2. wider timeliness and follow up activity
3. quality of outputs
4. workforce capability (figure 21)

Figures 20 and 21 show how the Office performed against these measures in 2025.

Figure 20: KPI investigator performance against the 28-day update requirement

	To respond to PSD	To respond to complainant
Average no. of days	27	22
% of responses which hit the 28-day target	60.9%	72.5%

Figure 21 presents a broader set of operational indicators relating to timeliness, follow-up, quality and workforce capability. Together, these measures provide context for how day-to-day performance is enabled and constrained in practice. In 2025, for the 28 day update requirement, the Office recorded an average of 27 days to issue updates to PSDs and 22 days to issue updates to complainants. However, compliance with the 28 day standard was 60.9% for PSD updates and 72.5% for complainant updates, therefore, not every update made by investigators was within 28 days. Timeliness can be affected when the SPCC requires further information

from the Appropriate Authority (AA) before making an informed determination, and during periods of organisational change (including changes in Commissioner) that create short-term capacity pressures.

Mitigation includes case-management reminders and management checks to support timely communication, alongside process improvements to reduce repeat delay points. An example of this is the intent to develop Memoranda of Understanding with each Service Police force to streamline the 28 day update process.

Figure 21: KPI on timeliness, follow-up, quality and workforce capability

Description	Target	Supporting Data	Outcome
1. Investigator performance against the 28-day update requirement.	Investigators to issue 100% of updates to PSDs within 28 days of the relevant milestone.	60.9% of updates to PSDs met the 28-day requirement.	Not met
	Investigators to issue 100% of updates to complainants within 28 days of the relevant milestone.	72.5% of updates to complainants met the 28 day requirement.	Not met
2. Workforce capability completion of mandatory SPCC induction training	100% of employees to complete SPCC induction training within 12 months of their start date.	All members of the Office of the SPCC and investigators.	Met

Workforce capability as an enabler of efficiency and effectiveness

Workforce capability underpins both operational effectiveness and efficiency. Staff who are appropriately trained and supported are better able to apply the Regulations consistently, manage cases without unnecessary delay and reduce avoidable rework. This supports quality decision-making, timely progression of investigations and more efficient use of limited organisational resources.

The inclusion of induction training within the operational indicators reflects its role as an enabler rather than a direct performance output. A capable workforce strengthens organisational resilience, reduces reliance on escalation and supervision for routine activity, and supports sustained delivery in the context of fluctuating demand and constrained capacity.

Operational effectiveness

Figures 20 and 21 set out the SPCC's operational KPIs, including compliance with the 28-day update requirement and wider measures of timeliness, follow-up, quality and workforce capability. Performance is usually better when there are fewer, or less complex, live cases and when staff have enough time for both investigative work and the case management and administrative tasks that support it.

Results can also vary depending on when key activity happens during the year. Milestones and related update deadlines can fall close together, and cases can move between triage, investigation and closure part way through the year. The figures should therefore be read as an in-year snapshot, not a direct measure of how much work there is or how serious cases are. This matters when considering how the Office is set up and resourced (**figure 22**).

Operational effectiveness also depends on making sure the work matches the staff available. The Office has to balance new referrals received during the year with older cases carried forward. These include ongoing cases shown in the **figure 3** pathway. **Figure 22** shows how the Office of the SPCC (the Commissioner plus three civil servants) manages triage and assessment and provides the operational and strategic support needed to progress investigative work.

The SPCC also engaged a Warrant Officer from DSCC as a Service Police Liaison Officer for two days per week. The Liaison Officer provides subject matter expertise to support SPCC development and specialist input where required, without compromising SPCC independence or operational decision-making.

Figure 22: Office of the SPCC (operational capacity)

Role/function	Resourcing model
Commissioner	Single post
Office of the SPCC (civil servants)	Three posts
Investigator cadre	Cadre hours are demand-led (flexed up or down in response to caseload and complexity)
Service Police Liaison Officer (DSCC)	Two days per week (2025)

Working effectively and SPCC representation across Defence

Joined-up governance is essential for operating efficiently and effectively. The SPCC oversees how the Service Police handle complaints, conduct matters, and death or serious injury (DSI) cases. This work directly relates to Service Policing standards, safeguarding, and Defence risk, resulting in a strong argument for SPCC representation on relevant MOD governance forums.

Consistent SPCC representation would help ensure that risks, themes, and lessons identified through SPCC casework are considered early in decision-making. This would reduce the risk of working in silos and support co-ordinated action across stakeholders. This includes insights from DSI oversight, which can highlight wider safeguarding and reputational risks for Defence if not addressed promptly.

This approach builds on chapter 4's focus on increasing awareness and transparency, including engagement with the pan-Defence standards and conduct programmes as per Recommendation 2. In practice, it is suggested that there would be real benefit in the SPCC attending meetings of the Service Justice Executive Group. The MOD should establish formal links between the SPCC and Defence Risk and Assurance governance to ensure SPCC evidence drives system-wide improvement and assurance.

Financial management

Financial management: Budget control and accountability

This section reports the SPCC's finances by financial year (April to March), rather than by calendar year. The 2025 annual report therefore includes figures from the 2025 to 2026 financial year. The figures below cover April to December 2025, so they do not include January to March 2026.

In 2025, the SPCC sought to scale its capabilities to meet increasing demand while operating within a fixed budget. Strong financial control was essential to ensure timely, fair, and well-governed delivery of its statutory responsibilities.

Operating under a control total of **£1.411 million for the 2025 to 2026 financial year**, the SPCC carefully monitored expenditure to balance core delivery needs with strategic investments. By December 2025, spending reached **£691,162**, reflecting prudent management of resources during the year.

Most of the expenditure was focused on **staffing (£574,503)**, recognising that skilled personnel are critical to effective oversight and complaint handling. Alongside this, targeted investments were made in enabling technology, including **£52,905 towards website development** to improve accessibility and transparency. Essential legal support (**£42,250**) and travel and subsistence (**£4,224**), and miscellaneous costs including continuous improvement (**£17,280**) were also carefully managed.

Looking ahead, the SPCC continues to monitor its financial position closely, with plans to finalise the full-year outturn and assess any variances. This disciplined financial management underpins the SPCC's commitment to transparency, accountability, and continuous improvement in Service Police oversight.

Challenges and mitigation

Resourcing requirements

The SPCC faces ongoing challenges developing capability and capacity to exercise all the available powers under the Regulations. Occasional rises in demand put pressure on how quickly cases are handled and on the team's ability to meet KPIs. To manage this, the SPCC prioritises cases, regularly reviews progress, and raises concerns when resources are stretched. Effective operations depend on joined-up working across Defence. Where the SPCC is not routinely represented in key governance forums, risks and learning from SPCC casework may be considered too late, increasing the likelihood of siloed decision-making.

To mitigate this, the SPCC will seek agreement with MOD for formal representation in relevant governance forums such as the Service Justice Executive Group and Defence Risk and Assurance. This will enable information relating to identification of risks and learning from SPCC casework, including DSI oversight, to support co-ordinated action on recommendations.

Maintaining timely communication

The SPCC tracks whether complainants get updates within 28 days. It uses reminders and management checks to make sure updates are provided on time.

Responses to recommendations

The SPCC monitors if formal responses to its recommendations arrive within 90 days. It follows up when responses are late.

Next steps

To build on progress made in 2025, the SPCC will focus on key actions that improve support, performance, financial management, and awareness. These steps will help ensure the organisation continues to meet its statutory responsibilities effectively and transparently.

- **Use capacity and demand data to target support:** PSDs will be requested to provide standardised quarterly updates on cases logged and recorded, outcomes (including timeliness), and the number submitted to the SPCC as mandatory and voluntary referrals. The SPCC would then use this information to agree where extra SPCC support is needed and review progress at regular check-ins.
- **Formalise joined-up governance:** Work with MOD to agree SPCC representation on relevant governance forums such as the Service Justice Executive Group and Defence Risk and Assurance so SPCC risks, learning and recommendations are considered early and siloed decision-making is reduced.
- **Keep financial control tight:** Manage finances carefully to stay within the 2025 to 2026 budget and prioritise core statutory work.
- **Embed the Statutory Guidance in 2026 engagement:** When the external website launches, publish the full guidance, executive version, and updated complaint form online. Use regular Provost Marshal/PSD meetings and simple explainer materials to raise awareness (building on chapter 4).
- **Improve information on PSD activity to help assess operational effectiveness:** This will include collecting consistent data on:

- the **number of complaints** – meaning the number of people who made a complaint
- the **number of allegations (heads of complaint) and/or investigations** linked to each complaint – e.g. one complaint may contain multiple allegations
- the **outcomes** of complaints and investigations – e.g. upheld/not upheld or referred/not referred

Chapter 5 recommendations

6. Right-size SPCC resourcing to match statutory responsibilities and rising demand

MOD should discuss a sustainable staffing model for the SPCC. This will reduce reliance on staff covering multiple roles (triple-hatting) and ensure the Office can meet its obligations efficiently and effectively.

7. SPCC representation in MOD governance

MOD should agree to SPCC representation at relevant MOD boards. This should include boards that consider Service Justice and Service Policing issues (for example, the **Service Justice Executive Group**) and Defence Risk and Assurance governance. This will support joined-up working, ensure learning and risk from SPCC oversight are considered early, and reduce siloed decision-making.

Chapter 6:

Conclusion and forward look



Standalone objective: Provide advice and recommendations to the Secretary of State, MOD, and Service Police, and outline future priorities.

This chapter draws together the main findings from the year and sets out priorities for the year ahead. It summarises what needs to happen next. It also explains the improvements that should follow across the Service Police complaints system and the wider MOD if the recommendations in this report are accepted and implemented.

Expected impact

Implementing the recommendations would deliver clearer, faster and more accountable oversight, with the SPCC better resourced. This would support timely, robust decisions. Stakeholders would have a clearer and more consistent understanding of the statutory framework. Learning from SPCC oversight would be linked to wider Defence improvement activity, including Raising Our Standards. Transparency would also improve through publication of key materials online.

Formal SPCC engagement in relevant MOD governance forums would help ensure risks and lessons are identified early and acted on. This includes issues arising from death or serious injury (DSI) matters. It would reduce the likelihood of issues being addressed in isolation. For Defence, this would mean earlier visibility of systemic risk and stronger assurance to ministers and Parliament. It would also reduce operational, legal and reputational risk through prompt action on evidence and learning.

For the Armed Forces community, this would mean a complaints system that is easier to understand and navigate. It would be more consistent in how it is applied. It would be more likely to deliver fair outcomes without avoidable delay. This should support confidence among Service personnel, families and veterans. For the public, it would

mean greater transparency about how complaints and serious matters are handled. It would also provide clearer independent scrutiny and support trust in accountability and fair treatment.

Some recommendations made in the SPCC's 2023 and 2024 annual reports remain outstanding. Where the underlying issue has not yet been resolved, the recommendations in this 2025 report should be read alongside those earlier recommendations.

SPCC priorities for 2026

The SPCC will take forward the actions below as priorities for 2026 to 2027. They will support implementation of the recommendations in this report. These actions are within the SPCC's remit and will be progressed alongside statutory casework.

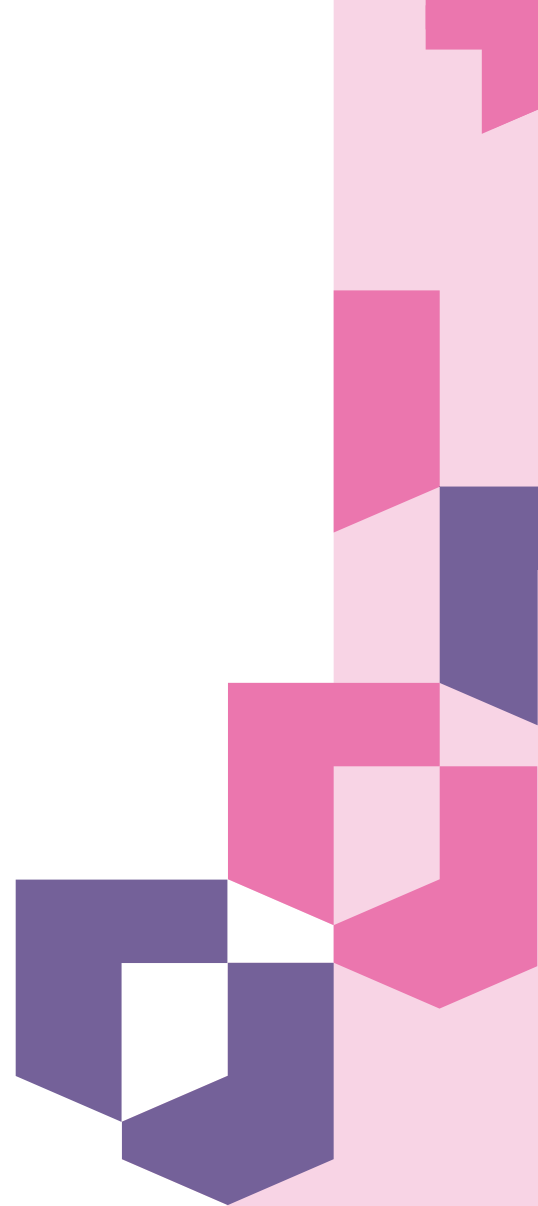
- Improve investigation timeliness by strengthening planning and day-to-day case management.
- Introduce a digital case management system to improve tracking and transparency. This depends on MOD approvals, assurance and access to a suitable system.
- Improve performance reporting on timeliness, caseload and key milestones, using consistent data definitions.
- Strengthen tracking of recommendations by maintaining a live action log and reporting compliance, following up and escalating overdue responses through agreed MOD governance channels.

- Make organisational learning a standing item at the SPCC Management Board and publish a short quarterly learning update, summarising themes and examples of effective practice (with appropriate confidentiality safeguards).
- Publish the Statutory Guidance on the SPCC external website once MOD cyber assurance is complete. Publish the executive version and clear 'how to' information at the same time. Review the guidance as planned and communicate any updates clearly.
- Roll out the independent participant welfare support service for those involved in SPCC investigations (including complainants, respondents, witnesses, and relevant family members), keeping it confidential and separate from investigative decision-making.

Conclusion

The recommendations in this report are intended to strengthen confidence in Service Policing. They focus on timeliness, consistency, learning and transparency. If accepted and implemented, the complaints system should be clearer to navigate and more joined-up in practice. It should also be better able to identify and manage risk early. The SPCC will monitor progress. It will report on delivery against these priorities in the next annual report. We also intend to publish progress against all our recommendations on the SPCC's external website in 2027.

Annexes



Annex A: Strategic objectives and statutory functions

Figure 1: Strategic objectives and statutory functions table

Strategic objective (and where covered)	Statutory functions engaged (Regulation 3(1))	How the strategic objective gives effect to the function(s)
Objective 1: Deliver fair, independent and timely outcomes (Chapter 2)	(c) Secure compliance with Part 3 requirements, ensure arrangements are efficient, effective and demonstrate appropriate independence. (d) Secure and maintain confidence in the existence and operation of suitable arrangements.	I. Focuses on the Commissioner's oversight of the complaints system in practice: a. triage decisions b. modes of investigation, timeliness and quality measures c. assurance that arrangements are operating independently, efficiently and effectively
Objective 2: Identify and share learning for continuous improvement (Chapter 3)	(a) Secure the maintenance of suitable arrangements. (b) Keep arrangements under review. (e) Make recommendations and give advice for modifying arrangements and (where relevant) Service Police practice.	Uses insight from the Commissioner's oversight activity to identify themes, promote organisational learning, and support continuous improvement. This is both within the SPCC and across Service Police arrangements.

Strategic objective (and where covered)	Statutory functions engaged (Regulation 3(1))	How the strategic objective gives effect to the function(s)
Objective 3: Increase awareness and transparency of the SPCC (Chapter 4)	(b) Keep arrangements under review (including through engagement and transparency). (d) Secure and maintain confidence among persons subject to Service law, civilians subject to Service discipline, and the public.	I. Enhances awareness of individuals' rights, the complaints processes, and the role of independent oversight. This helps build trust and confidence among stakeholders in both the complaints system and how it operates. II. Additionally, by promoting transparency and active engagement, the Commissioner is better equipped to evaluate whether the arrangements in place are effective and appropriate in practice.
Objective 4: Operate efficiently and effectively (Chapter 5)	(a) Secure the maintenance of suitable arrangements (including within the Commissioner's own office). (c) Secure that arrangements are efficient and effective.	I. Ensures the Commissioner's Office can discharge statutory responsibilities through clear processes, robust performance management, and effective use of resources – supporting the overall efficiency and effectiveness of the system.
Conclusion and forward look (Chapter 6)	(b) Keep arrangements under review. (e) Make recommendations and give advice for modification of arrangements and, where relevant, Service Police practice.	I. Draws together findings from the year's oversight. In addition, the report consolidates all the recommendations and priorities, reflecting the Commissioner's statutory role in advising on improvements.

Annex B: List of figures reflected in the report

Figure	What it shows
Figure 1	Strategic objectives and statutory functions table
Figure 2	Report at a glance table
Figure 3	Overview of SPCC caseload by source, 1 January 2025 to 31 December 2025
Figure 3(a)	How complaints, conduct matters and DSI matters enter the system (recording and referral overview)
Figure 4	Fairness, independence and measuring timeliness
Figure 5	SPCC decisions on referrals
Figure 6	KPI for continuous improvement
Figure 7	Logged cases by PSD for 2024 and 2025
Figure 8	Logged cases by PSD and SPCC referrals for 2025
Figure 9	Overall cases logged and recorded for 2024 and 2025
Figure 10	Definitions for each outcome category logged by PSDs
Figure 11	Number of cases logged by outcome and type, 1 January 2025 to 31 December 2025
Figure 12	SPCC case determinations
Figure 13	Cases logged by nature of complaint/conduct matters
Figure 14	Distribution of logged cases by category, 2024 and 2025
Figure 15	Cases logged by location (UK vs overseas)
Figure 16	SPCC referrals: complaints, conduct or DSI
Figure 17	KPI for awareness and transparency

Figure	What it shows
Figure 18	Number of estimated strengths by Service Police forces in 2025
Figure 19	PSD staffing levels and complaints by Service Police force, 1 January 2025 to 31 December 2025
Figure 20	KPI investigator performance against the 28-day update requirement
Figure 21	KPI for timeliness, follow-up, quality and workforce capability
Figure 22	Office of the SPCC (operational capacity)

Annex C: Conduct matters and DSI matters

1. Conduct matters

A **conduct matter** is something that is **not, and has not been,** made as a formal complaint, but where there is reason to think that a member of a Service Police force may have committed a Service offence or behaved in a way that could justify starting administrative action.

2. Recording and referral (conduct matters)

Not all conduct matters are handled under the Regulations. For example, where criminal or disciplinary proceedings are already in train, or administrative action is being taken, there is no requirement to record the matter. Where the Regulations require a conduct matter to be **referred** to the SPCC, the AA (usually through its PSD) must **record** it and **refer** it. Where a conduct matter is recorded but referral is not required, the AA decides how to handle it. Where the SPCC treats a conduct matter as referred, it must also be recorded by the SPCC.

3. DSI matters

A DSI matter arises when a person dies or is seriously injured in either of the following circumstances and the matter is not already the subject of a complaint:

- at the time of DSI the person was detained following arrest by a member of a Service Police force, or was otherwise detained in the custody of a member of a Service Police force, or
- at or before the time of DSI, the person had contact with a member of a Service Police force acting in the execution of their duties and there is an indication that the contact may have caused or contributed to the DSI

