

Police complaints system in the Wiltshire and Swindon policing area – 2024/25

Background and oversight

This narrative is produced in line with the requirements of The Elected Local Policing Bodies (Specified Information) (Amendment) Order 2021 which requires PCCs to set out how they held the chief officer to account for the performance of the police complaints system locally, and their assessment of their own performance in carrying out their other complaints handling functions. This narrative is required to be produced following the publication of the annual complaints statistics by the Independent Office for Police Conduct (IOPC), on which this is based.

During the year covered by this report, monitoring of the performance of the police complaints system was carried out at both a strategic and tactical level between the PCC and Chief Constable, and by OPCC staff and other officers and staff of Wiltshire Police on behalf of their respective organisational leaders.

At a strategic level, the overall performance of the system was reported to the Force Performance Board, chaired by the Deputy Chief Constable of Wiltshire Police. In addition, the PCC held monthly meetings with the Chief Constable to provide oversight of overall performance and any escalated issues and risks.

The Executive Leadership Team held quarterly performance meetings, chaired by the OPCC Chief Executive, to review published data and internal indicators, explore emerging themes and trends, and escalate any areas of concern.

Complainant satisfaction

A number of measures are available that can be used as indicators of complainant satisfaction, including the number of informal complaints that were escalated to the formal process, and the number of review applications received as a percentage of overall formal complaint cases finalised.

In 2024/25, there were 94 complaints formally recorded because they were unable to be resolved through the informal handling process. This represents 22% of the total number of recorded complaints, higher than the national average figure of 16%. This compares to 78 complaints in 2023/24, which represented 14% of the total, which was lower than the national average figure of 16%.

In 2024/25, there were 481 formal complaints cases finalised, and a right of review requested in 63 cases (36 to the OPCC, 27 to the IOPC). This represents 13% of the total number, lower than the national average of 21%. This compares to 539 cases in 2023/24 and 103 review requests (71 to the OPCC, 32 to the IOPC), representing 19% of the total number, lower than the national average figure of 21%.

Using the 'complaint recorded' indicator alone as a measure would suggest complainants may not as satisfied as previously with the informal handling process. However, this indicator does not take into account the nature and increased complexity of some complaints against the police, and that complainants can request

their complaints to be formally recorded if they are not happy with the outcome, irrespective of how thorough the informal handling process may have been. Conclusions should therefore not be drawn in isolation.

While it is encouraging to note the reduction in the percentage of finalised complaint being reviewed, this should not be taken as the sole indicator of satisfaction with the complaints system. Good customer service should be a central pillar of the complaints system – even if the final outcome is not to the complainant's satisfaction, they should feel their voice has been heard.

Formal recommendations in relation to complaint handling

Where any recommendations are made by His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) in relation to complaint handling by Wiltshire Police, these would be tracked by the Professional Standards Department and progress monitoring by the Head of Professional Standards. No such recommendations have been made in 2024/25.

For recommendations made in individual cases or thematic work by the IOPC, these would be considered by the Professional Standards Department Leadership Team (DLT) and the Organisational Learning Tactical Group, chaired by the Head of Professional Standards and which reports into the Organisational Learning Strategic Board chaired by the Deputy Chief Constable. The responses would also be published on the IOPC website. During 2024/25, there were no IOPC cases resulting in formal recommendations.

Monitoring and improving performance in the timeliness of complaint handling

Following a change in legislation in 2020, a decision was taken by the PCC to take on additional responsibilities for police complaints handling beyond their minimum legal responsibilities. Of the options available to the PCC, Wiltshire has adopted a set-up known as Model 2. This means the overall timeliness of complaint handling is a shared responsibility, with the OPCC handling the initial contact from a complainant and the informal resolution process, and Wiltshire Police dealing with formal complaint handling.

In 2024/25, the average number of working days to log expressions of dissatisfaction from members of the public was four days, lower than the national average of seven days, and is the same time period when compared to 2023/24. The average number of working days to make initial contact with members of public in response to their expression of dissatisfaction was four days, lower than the national average of nine days. This compares to three days in 2023/24.

In 2024/25, the average number of working days to finalise allegations handled through the informal resolution process was 51 days, higher than the national average of 20 days. The number of valid allegations finalised in this way was 1,120. This compares to an average of 44 days in 2023/24 when the number of allegations finalised was 821.

In 2024/25, the average number of working days for Wiltshire Police to finalise complaint cases that weren't formally investigated was 162 days, higher than the national average of 124 days. The number of valid complaints finalised in this way was 403. This compares to an average of 120 days in 2023/24 when the number of finalised complaints was 476.

For complaints that were formally investigated, the average number of working days to finalise cases was 419 days, higher than the national average of 234 days. The number of valid complaints finalised in the way was 76. This compares to an average of 283 days in 2023/24 when the number of finalised complaints was 50.

With the exception of the time taken to log and acknowledge expressions of dissatisfaction when they are received from the public, both the OPCC Complaint Resolution Team and Wiltshire Police Professional Standards Department continue to take longer than the national average to resolve complaints.

Measures introduced in the previous 12 months have not resulted in a sufficient improvement in timeliness. It is accepted that the increase in both number and complexity of matters in the past year are factors that may be cancelling out any intended benefits of new working practices. There were also periods of time when both departments experienced staff shortages for a variety of reasons, meaning they could not perform at full capacity.

Internal monitoring of complaint statistics have already highlighted the extent of these challenges and we are aware of additional personnel and procedural changes implemented partway through the 2025/26 year. It will however not be until the conclusion of the 2026/27 year until the impact will be seen in official statistics and local processes will be required in order to monitor the effectiveness of changes and respond swiftly if it is not having the desired effect on confidence in the police complaints system.

[Complaint investigations more than 12 months old](#)

Under police complaints legislation, Wiltshire Police is required to inform the PCC and the IOPC if a complaint investigation has not been completed within 12 months. There is also a requirement for the IOPC to inform the PCC and Wiltshire Police if any of its independent investigations relating to Wiltshire Police officers or staff have not been completed within 12 months. In both cases, the relevant organisation is required to give a reason why it has taken this length of time, and the steps it will be taking to conclude it in a timely way.

During 2024/25, there were 17 notices issued by Wiltshire Police and one issued by the IOPC.

There are no regional or national comparator figures available for this measure and as such, it is difficult to say what is considered to be an average number and if Wiltshire Police and the IOPC (in its handling of Wiltshire cases) are ahead or behind its peers.

It remains the case that the reasons for complaint investigations of this length can broadly be dividing into two categories – sub-judice, where the subject of the complaint is intrinsically linked to ongoing criminal proceedings, and administrative.

Complainants in sub-judice cases have a right of challenge to the IOPC against the Professional Standards Department decision to suspend complaint handling for this reason.

In respect of delays due to administrative challenges, improvements to business processes were not implemented consistently and management oversight was sporadic. This was raised with the Professional Standards Department and a restructure introduced partway through the 2025/26 year is designed to increase ownership and accountability for such issues.

Complaint Reviews

All Police and Crime Commissioners are responsible for carrying out reviews of some police complaints as defined in the legislation and statutory guidance. In Wiltshire, the PCC has delegated the undertaking of reviews to a pool of Independent Adjudicators, appointed by the OPCC but sit outside the day-to-day management structure to ensure quality, integrity and impartiality in their decision making.

The review process for individual cases is primarily undertaken by the Adjudicator allocated to it. However, at key points such as validation and outcome, discussions may take place between the Adjudicators to ensure consistency in the decision making and assurance that any decisions taken are in line with the relevant legislation and guidance.

During 2024/25, there were 63 reviews received either by the PCC or the IOPC, the two review bodies for police complaints. This represents 13% of the total number of 481 formal complaints finalised, which is lower than the same comparator for the previous year (19%) and lower than the national average of 21%.

When considering those reviews carried out by Independent Adjudicators, there were 32 carried out, of which two were investigations. In six of the cases, both being non-investigation cases, it was found the outcome of the complaint handling by Wiltshire Police was not reasonable and proportionate, and recommendations were made with a view to remedying the dissatisfaction of the complainant. This represents 19% of all cases considered by Independent Adjudicators, up from 10% in 2023/24 when there were 67 reviews to consider and seven cases that were not handled in a reasonable and proportionate way.

The average number of working days to complete reviews by the Independent Adjudicators was 15, lower than the national average of 48 days. This compares to 36 days in 2023/24, which was also lower than the national average of 50 days. By comparison, the average number of working days for the IOPC to complete Wiltshire-related reviews (of which 29 were completed) was 147, one day quicker than the national average of 148 days. This compares to 115 days in 2023/4 when they completed 31 reviews.

The number of reviews upheld is small in number and it is therefore difficult to identify clear themes and trends from reviews alone to provide an indication of the quality of complaint handling or underlying matters that are being complained about. Having said that, in the majority of cases, the reason for upholding the review was because the complaint was not answered in full, and an allegation made by a complainant had not been addressed by the complaint handler. This is consistent with previous years and anecdotally is an issue in other parts of the country. This issue can arise because the complainant has not been contacted as part of the complaint handling process, instead the complaint handler has relied alone on the original submission by the complainant, which can be open to different interpretations and misunderstandings. Contact with complainants should be encouraged by all complaint handlers to ensure the dissatisfaction is fully understood and nothing is overlooked.

Independent Adjudicators are able to make oversight observations in cases where they do not uphold a review. For the second year in a row, it has been noted in a significant number of cases that there has been a lack of compliance with the

requirement to update complainants every 28 days with the progress of their complaint. Due to the consistency of this being an issue, the matter has been escalated within Wiltshire Police and this has been taken into account when making decisions around future resource allocations and accountabilities within the Professional Standards Department during the organisational restructure in the latter part of the 2025/26 year. We anticipate that we will not see a downward trend in this figure until the 2026/27 statistics, but performance will be monitored internally ahead of this.