

Evaluation of police super-complaints

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Evaluation research team, HMICFRS Insight portfolio

Summary

Introduction

The Home Office police super-complaints system became operational on 1 November 2018. It allows organisations designated by the Home Office to raise an issue (a super-complaint) on behalf of the public.

A super-complaint is a complaint that a feature, or combination of features, of policing in England and Wales by one, or more than one, police force is, or appears to be, significantly harming the interests of the public. The process for making and considering super-complaints is set out in the [Police Super-complaints \(Designation and Procedure\) Regulations 2018](#) (the regulations).

Super-complaints are considered by His Majesty's Inspectorate of Constabulary & Fire and Rescue Services (HMICFRS), the [College of Policing \(CoP\)](#) and the [Independent Office for Police Conduct \(IOPC\)](#). If a super-complaint is found to be eligible (according to the regulations), HMICFRS, the CoP and/or the IOPC investigate it and a report is published. The report includes recommendations for the policing sector and actions for HMICFRS, the CoP and the IOPC.

After the report is published, those who are subject to the recommendations are asked to respond to them within 56 days.

Up to the time of this evaluation, seven super-complaints had been found to be eligible for investigation. The [submissions and investigation reports are publicly available](#).

Internal, post-investigation reviews of the super-complaints system were carried out after each super-complaint was completed, and the internal processes of the super-complaints system continually improved. However, since the system was set up, there hasn't been a formal assessment of its impact. The HMICFRS Board asked HMICFRS researchers to carry out a formal evaluation of the super-complaints system.

Aims

The evaluation aimed to address five research questions:

1. Has the super-complaints system contributed to changes in policing? If so, what changes and impact have been achieved?
2. Which elements of the super-complaints system are most relevant to achieving any changes in policing?
3. What are the barriers to achieving changes in policing from the super-complaints system?
4. Are there any unintended consequences of the super-complaints system?
5. Would the outcomes from the super-complaints system have occurred anyway (without the super-complaints system)?

Conclusions

Research question 1: Has the super-complaints system contributed to changes in policing? If so, what changes and impact have been achieved?

To achieve the expected outcomes (changes in policing), the super-complaints system first needs to have produced the expected outputs.

Evidence for the outputs and outcomes was therefore examined as part of the evaluation.

Expected outputs from the super-complaints system, identified ahead of the evaluation, included:

- the submission and publication of eligible super-complaints;
- completed investigations and published investigation reports;
- recommendations for forces and stakeholders; and
- identification and sharing of innovative and [promising practice](#).

The evaluation found that these outputs had been produced and had contributed to the impact of the system.

Seven super-complaints had been submitted, published and investigated.

These brought to light the issues raised, many of which were failures by the police to adequately protect [vulnerable](#) individuals, including [victims](#) of [domestic abuse](#), [stalking](#) and [modern slavery](#).

The published investigation reports had added to the evidence for the aspects raised in the super-complaints, providing robust evidence all in one place. This can be cited by designated bodies and others, and can easily be referred to by policing stakeholders, forces, policymakers and others, when agreeing actions to be taken in policing and when discussing priorities.

Recommendations had been made and the follow-up showed many had been addressed or actions were underway.

Promising and [innovative practice](#) had been identified, which the CoP could assess and share with the policing sector to apply.

Expected outcomes from the super-complaints system included:

- improvements being made to policing;
- increased awareness and understanding of the issues raised in the super-complaint;
- an increase in the evidence for these issues; and
- increased awareness of the super-complaints system and the bodies designated to submit super-complaints.

There was evidence of expected outcomes being achieved, at least to some extent, and evidence of the super-complaints system helping to drive improvements in policing. Forces and policing stakeholders reported taking action in response to the recommendations, including updating training, policies and guidance; and reviewing independent panels and the support services they provided to victims. Interviewees, including those from the designated bodies who had raised the super-complaints, reported an increase in awareness and understanding of the issues raised and of the changes needed. And the Home Office reported establishing new data collections to improve monitoring of the issues raised. It also reported making some changes which, although not directly addressing the recommendations made, were in line with resolving the issues raised.

Research question 2: Which elements of the super-complaints system are most relevant to achieving any changes in policing?

The evaluation found there were direct and indirect drivers stemming from the super-complaints system that contributed to changes in policing and addressing the issues raised.

The main direct drivers were:

- recommendations; and
- recommendation follow-up.

The recommendations laid out what changes needed to be made and provided an independent view that could be used to support improvements in policing. Interviewees reported that the follow-up on recommendations, where those subject to recommendations were asked to respond within 56 days, created a sense of urgency and momentum for change.

The main indirect drivers were:

- the increased understanding and awareness of forces, policing stakeholders and designated bodies of the issues raised in the super-complaints and the extent of them; and
- an increased awareness of the need for change.

Increased media coverage and publicity about the super-complaints contributed too.

Another indirect driver that was reported was increased scrutiny, for example, by chief constables or [police and crime commissioners](#).

Interviewees also reported the collaboration the super-complaints system requires, for example, between the investigating bodies and those who were subject to the recommendations, as supporting changes to policing. This was particularly the case when this collaboration continued after the super-complaints work was completed.

Designated bodies reported how their profile had been raised and how this had created opportunities for them to attend meetings with policing stakeholders and to interact with the media.

Research question 3: What are the barriers to achieving changes in policing from the super-complaints system?

Barriers included:

- lack of capacity;
- follow-up on recommendations being too early to be meaningful;
- recommendations not being feasible to implement and challenging to address quickly;
- recommendation fatigue;
- recommendations containing multiple elements;
- responses rarely detailing how forces would monitor or evaluate changes; and
- the length of the investigation.

A lack of capacity was reported across the board, affecting designated bodies submitting a super-complaint, those trying to carry out a timely investigation, and policing stakeholders who were subject to the recommendations outlined in investigation reports. Interviewees felt the lack of capacity meant the system relied a lot on goodwill on all sides to make sure it led to changes in policing.

The limited follow-up on recommendations made to the policing sector and actions for HMICFRS, the CoP and the IOPC was a common theme among interviewees. Although the follow-up on recommendations 56 days after publication created a sense of urgency and momentum for change, policing stakeholders felt this timing was too early to be meaningful.

Policing stakeholders reported some recommendations weren't feasible to implement and were challenging to address quickly, due to the lengthy bureaucratic processes often involved. And the number of recommendations from super-complaints and elsewhere, such as HMICFRS inspections, contributed to recommendation fatigue and made prioritisation difficult.

Many recommendations contained multiple elements to be addressed. This made it difficult for forces and policing stakeholders – and the researchers – to assess progress. The researchers noted there were often large gaps in the forces' reports of progress; they often reported they had addressed some aspects of a recommendation but not all.

There was rarely any mention in responses to the recommendations of how forces would monitor the changes made to make sure [officers](#) adopted them. Nor was there mention of evaluating the effectiveness or longevity of the changes made. Therefore, although changes had been made, it wasn't possible to know if they were having the intended effects.

The length of time the investigation took was mentioned as resulting in a loss of momentum in addressing the issues raised and limiting the contribution that could be made in the public domain to ongoing discussions of the issues.

Research question 4: Are there any unintended consequences of the super-complaints system?

Interviewees reported a few unintended consequences.

They reported increased workloads for:

- designated bodies due to more victims or those harmed coming forward; and
- police forces due to closer scrutiny in forces concerning the issues raised in the super-complaints.

They also reported delays to the completion of investigations and publication of investigation findings. This was caused by the difficulties of investigating bodies working together across organisations with different systems and processes, and more people being involved in decision-making and sign-off of outputs.

Research question 5: Would the outcomes from the super-complaints system have occurred anyway (without the super-complaints system)?

Several outcomes were identified as being due to super-complaints specifically.

Many recommendations were addressed, and the follow-up process created a sense of urgency to changes being made to policing.

The super-complaints system increased the evidence for the issues raised. The presentation in the report made the evidence easily accessible and available for review and citation.

The designated bodies increased their understanding of the issues. This was due to the need for them to identify patterns and trends among the individuals who contacted them for help or support as part of the super-complaint submission process.

The profile of designated bodies was increased, through the process of submitting a super-complaint and the attention this brought.

Next steps

Since the evaluation was carried out, the super-complaints investigating bodies have published a [memorandum of understanding](#). This sets out agreed ways of working to carry out super-complaint investigations trilaterally.

The three organisations have also developed (alongside the completion of the evaluation) internal operating processes and guidance. These are to support effective cross-organisation working and to make sure lessons (about what worked and what could be improved) from super-complaint investigations are recorded and inform future investigations.

This work has recorded areas of learning highlighted in the evaluation findings. It includes documented processes, templates and guidance to support:

- the planning of the scope of investigations to make sure they are focused on areas that will address any gaps in evidence or knowledge, lead to change and have impact;
- the development and publication of timely, accessible investigation reports; and
- effective approaches to developing recommendations that are informed by working with stakeholders and that support transparency and accountability concerning impact and improvements made.

Further consideration could be given to how recommendations and actions from super-complaints are followed up, including:

- how they could be monitored and tracked and who would be responsible for this; and
- when follow-up could occur and the resource implications and funding arrangements.

This should be considered with reference to the police reforms concerning evaluation and follow-up on recommendations. These are set out in the 2026 Home Office white paper, '[From local to national: a new model for policing](#)'.

Methodology

The evaluation was carried out between March 2024 and May 2025. It included two main phases of qualitative research. Each phase involved a different number of super-complaints, reflecting the available resource and the timescales within which the work could be carried out.

Phase 1 involved a range of desk-based research:

- A summary was made of each of the seven super-complaints, which included who raised it, the issues raised, the types of evidence presented in the submission, the investigation methodology, the investigation duration, the recommendations made, who the recommendations were addressed to and the actions assigned to HMICFRS, the CoP and the IOPC.
- A detailed recommendations review was carried out for three of the seven super-complaints, which included examination of the extent to which recommendations had been addressed.
- Web analytics of two published super-complaints was carried out by the HMICFRS communications team as part of its business-as-usual work and was shared with the evaluation team.

Phase 2 involved interviews with:

- designated bodies (the organisations designated by the Home Office to raise a super-complaint on behalf of the public);
- investigating bodies (HMICFRS, CoP and the IOPC); and
- policing stakeholders.

Two of the super-complaints included in the Phase 1 recommendations review were included in this phase of the research. Interviews were recorded, transcribed and thematically coded.

The findings reflect the impact the super-complaints system had at the time of the evaluation.

Introduction

The Home Office police super-complaints system became operational on 1 November 2018. It allows organisations designated by the Home Office to raise an issue (a super-complaint) on behalf of the public.

A super-complaint is a complaint that a feature, or combination of features, of policing in England and Wales by one, or more than one, police force is, or appears to be, significantly harming the interests of the public. The super-complaints system is designed to examine problems of local, regional or national significance that may not be addressed by other elements of the police complaints system.

The process for making and considering super-complaints is set out in the [Police Super-complaints \(Designation and Procedure\) Regulations 2018](#) (the regulations). The system covers all 43 police forces in England and Wales, as well as the National Crime Agency, British Transport Police and the Civil Nuclear Constabulary. The government publishes [guidance on the super-complaints system and how it operates](#).

Super-complaints are considered by officials at His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), the [College of Policing \(CoP\)](#) and the [Independent Office for Police Conduct \(IOPC\)](#). If a super-complaint is found to be eligible (according to the regulations), HMICFRS, the CoP and/or the IOPC investigate it. A report is published on the GOV.UK website, which includes recommendations for the policing sector and actions for HMICFRS, the CoP and the IOPC.

After the report is published, those who are subject to the recommendations are asked to respond to them within 56 days.

Up to the time of the evaluation, seven super-complaints had been found to be eligible for investigation:

- Liberty and Southall Black Sisters submitted a super-complaint about the police sharing data with Immigration Enforcement on [migrant victims](#) and witnesses.
- Hestia submitted a super-complaint about the police response to victims of [modern slavery](#).
- The Centre for Women's Justice submitted a super-complaint about the police use of protective measures in cases of violence against women and girls.

- The Centre for Women’s Justice submitted a super-complaint about the police response to police-perpetrated [domestic abuse](#).
- Tees Valley Inclusion Project submitted a super-complaint about the police response to those from ethnic minority backgrounds who are victims of [sexual abuse](#) and may also be at risk of [honour-based abuse](#).
- The Criminal Justice Alliance submitted a super-complaint about the police use of ‘suspicion-less’ [stop and searches](#) and how these affect Black and ethnic minority communities.
- The Suzy Lamplugh Trust submitted a super-complaint about the inadequate investigation of [stalking](#) offences and insufficient protection of victims.

The [submissions and investigation reports for these complaints are publicly available](#).

Evaluation of super-complaints

The Home Office policing super-complaints system has been running since 2018. Internal, post-investigation reviews of the super-complaints system have been carried out by super-complaints officials after each super-complaint was completed, and the internal processes of the super-complaints system continually improved. However, since the system was set up, there hasn’t been a formal assessment of its impact that assesses:

- the extent to which the system is achieving the desired or expected outcomes;
- which aspects of the system are helping to achieve these desired or expected outcomes; and
- whether any further improvements or changes to the system are needed.

The HMICFRS Board asked HMICFRS researchers to carry out a formal evaluation of the super-complaints system.

Aims

The evaluation aimed to address five research questions:

1. Has the super-complaints system contributed to changes in policing? If so, what changes and impact have been achieved?
2. Which elements of the super-complaints system are most relevant to achieving any changes in policing?
3. What are the barriers to achieving changes in policing from the super-complaints system?
4. Are there any unintended consequences of the super-complaints system?
5. Would the outcomes from the super-complaints system have occurred anyway (without the super-complaints system)?

Methodology

Social researchers in the HMICFRS Insight portfolio evaluated the super-complaints system between March 2024 and May 2025. The portfolio is an analytical and research unit that supports HMICFRS inspections.

Designing the evaluation

The evaluation was built around a theory of change (explained in government evaluation guidance, the [Magenta Book](#)), which was developed in a workshop held with super-complaints officials from HMICFRS, the [College of Policing \(CoP\)](#) and the [Independent Office for Police Conduct \(IOPC\)](#). During the workshop, expected inputs, activities, outputs, outcomes and impacts from the super-complaints system were identified. These were incorporated in the theory of change and are shown in [annex A](#). [Annex B](#) includes an accessible version.

The theory of change, alongside the aims of the evaluation, was used to identify what the evaluation needed to assess and measure.

The super-complaints system already includes an internal review after each super-complaint is completed. This considers whether any of the processes and activities could be improved. It was therefore decided to focus the evaluation on the expected outputs and outcomes from the super-complaints system, as this was the biggest evidence gap.

Figure 1 shows the outputs and outcomes from each stage of the super-complaints system identified in the theory of change.

Figure 1: Expected outputs and outcomes from super-complaints

Stage of the super-complaints system	Outputs	Outcomes
Super-complaints are prepared for submission and submitted to HMICFRS by a designated body.	Super-complaint submissions.	• Victims or those harmed can share their stories with police and investigating bodies • Designated bodies have a better understanding of the issues raised with them and are better able to support the people who contact them.
Super-complaints are assessed for eligibility by HMICFRS, College of Policing (CoP) and the Independent Office for Police Conduct (IOPC) and published by HMICFRS.	Published eligible super-complaints.	• Increased knowledge and understanding of issues in policing • Victims or those harmed can see issues being raised • More victims or those harmed coming forward (to police and designated bodies) • Increased interest in and discussion of the issues raised in the super-complaint • Increased awareness of designated bodies • Increased awareness of the super-complaints system.
The scope of the super-complaint investigation is planned by HMICFRS, the CoP and the IOPC.	• Terms of reference • Lines of enquiry.	• Evidence gaps are identified • Investigating bodies working effectively together across organisations.

Stage of the super-complaints system	Outputs	Outcomes
An investigation of the super-complaint is carried out by HMICFRS, the CoP and the IOPC.	• New evidence to fill evidence gaps • Feedback to forces included in the investigation • Recommendations for forces and policing stakeholders • Actions for HMICFRS, the CoP and the IOPC • Innovative and promising practice, for the CoP to assess and share with the policing sector to apply.	• Forces included in the investigation are aware of actions needed in their force • Investigating bodies have an agreed viewpoint on the issues and how to effectively police them.

Stage of the super-complaints system	Outputs	Outcomes
The investigation findings are published by HMICFRS.	• Super-complaint investigation report, including recommendations and actions • Press releases and social media posts from investigating bodies and designated bodies.	• Forces and policing stakeholders are aware of changes that need to be made • HMICFRS, the CoP and the IOPC are aware of actions they need to take • The CoP is aware of potential new innovative and promising practice • Increased evidence, easily accessible in one place • Police, stakeholders and the public have increased awareness of policing the super-complaint issues • Forces and policing stakeholders make changes to policing • HMICFRS, the CoP and the IOPC address actions • Victims or those harmed can see issues being raised • Increased awareness of the super-complaints system • Increased awareness of designated bodies.

Stage of the super-complaints system	Outputs	Outcomes
Recommendations are followed up by or overseen by HMICFRS, the CoP and the IOPC.	• Responses to the recommendations within 56 days of investigation report publication • Responses to the actions • Force and policing stakeholder action plans.	• Improvements made to policing • Public and victims see changes being made • Increased interest in and discussion of issues raised in the super-complaint • Forces held to account for recommendations made to them.
An internal post-project review is carried out by HMICFRS, the CoP and the IOPC.	Internal lessons-learned sessions, so learning can be applied to future super-complaint processes.	Super-complaint processes improved.
Legislative requirements are met.	• Acknowledgement of receipt of a super-complaint • Eligibility decision • Progress reports outlining progress on the investigation made over the previous 56 days and next steps to be taken on the investigation in the next 56 days • Published reports on the outcome of the investigation, with actions to be taken by HMICFRS, the CoP and the IOPC, and recommendations to any other party as they consider appropriate.	Investigating bodies meeting legislative requirements for the super-complaints system.

Carrying out the evaluation

Two main phases of research were carried out: desk-based research and primary research. Evidence from each was combined to answer the research questions.

The super-complaints included in each individual research activity are shown in Figure 2. They reflect the available resource and timescales within which the work could be carried out.

Figure 2: Super-complaints included in each individual research activity

Super-complaint	Phase 1: Super-complaints review	Phase 1: Recommendations review	Phase 1: Web analytics	Phase 2: Primary research
Police data sharing for immigration purposes (2018)	Yes	Yes	No	No
Police response to victims of modern slavery (2019)	Yes	No	No	No
Police use of protective measures in cases of violence against women and girls (2019)	Yes	No	No	No
Force response to police perpetrated domestic abuse (2020)	Yes	Yes	No	Yes
Police response to victims of sexual abuse from ethnic minority backgrounds who may be at risk of honour-based abuse (2021)	Yes	No	No	No

Super-complaint	Phase 1: Super-complaints review	Phase 1: Recommendations review	Phase 1: Web analytics	Phase 2: Primary research
Police use of stop and search powers (2021)	Yes	Yes	Yes	Yes
Police response to stalking (2022)	Yes	No	Yes	No

Phase 1: Desk-based research

Super-complaints review

Common themes were identified across all super-complaints by reviewing the super-complaint submission and investigation reports. A summary of each super-complaint was made that included:

- who raised it;
- issues raised;
- types of evidence presented in the submission;
- investigation methodology;
- investigation duration;
- recommendations made;
- who the recommendations were addressed to; and
- actions assigned to HMICFRS, the CoP and the IOPC.

Recommendations review

A detailed review was carried out of the recommendations made in three super-complaint reports. Based on published responses to the recommendations, the review examined the extent to which recommendations had been addressed by recipients of the recommendations.

The three super-complaints included two older ones – to allow time for action to have been taken in response to any recommendations – and one newer one to reflect the system in its more recent form.

The three complaints selected were:

- Police use of stop and search powers – investigation report published in December 2023.
- Force response to police perpetrated domestic abuse – investigation report published in June 2022.
- Police data sharing for immigration purposes – investigation report published in December 2020.

More details about how each recommendation was assessed are available in [annex C](#).

Web analytics

Web analytics provide data on the number of views of the HTML version of super-complaint reports and the number of downloads of the PDF version of reports. The HMICFRS communications team analysed data for two of the seven super-complaints as part of their business-as-usual work and provided their analysis to the evaluation team. The reports and the analysis carried out were as follows:

- Police use of stop and search powers – the number of people who accessed the press release, the HTML report and the PDF report within the first week of publication; which sections of the report were accessed and for how long.
- Police response to stalking – the time spent viewing the HTML report within the first two weeks of publication; which sections of the report were accessed and for how long.

Phase 2: Primary research

Primary research was carried out with designated bodies (the organisations designated by the Home Office to raise a super-complaint on behalf of the public), investigating bodies (HMICFRS, the CoP and the IOPC) and policing stakeholders.

Two super-complaints were included in this phase.

One of the more recent super-complaints was selected, for the following reasons:

- to help the interviewees remember the super-complaint and what had happened;
- to make sure the evaluation gathered first-hand reports (which was more challenging for much earlier super-complaints where there had been many [personnel](#) changes); and
- to make sure the evaluation reflected the system in its more recent form.

An older super-complaint was also selected to allow time for recommendations to have been addressed and actions (for HMICFRS, the CoP and the IOPC) to have been completed.

The two super-complaints selected were as follows:

- Police use of stop and search powers – investigation report published in December 2023.
- Force response to police perpetrated domestic abuse – investigation report published in June 2022.

Interviews were carried out by HMICFRS social researchers and Home Office social researchers (due to a lack of capacity in HMICFRS alone). Eleven hour-long interviews were carried out by six social researchers, between 28 January and 11 March 2025. Interviews included at least one person from each of the following groups:

- designated bodies
- HMICFRS subject matter leads
- IOPC subject matter leads
- CoP policy and analytical leads
- Home Office policy, policing and analytical leads
- [National Police Chiefs' Council](#) and the [Association of Police and Crime Commissioners](#) policing area leads.

Interviewees from individual forces weren't included in the evaluation due to resource constraints and the difficulty of identifying relevant interviewees in multiple forces.

Topic guides for the interviews were developed to make sure they covered all relevant elements of the theory of change and addressed the research questions. They included sections on:

- the impact of super-complaints on policing practice, victims, designated bodies and policing stakeholders;
- unexpected outcomes; and
- views on reports and recommendations.

Interviews were recorded and transcribed. Recordings were deleted once they were transcribed and the transcripts had been checked.

Specialist software for analysing qualitative data, NVivo, was used to thematically code the interview transcripts. Further details are available in [annex C](#).

Ethics and governance

All research was carried out in line with the [Government Social Research Code](#).

Before each interview, the interviewee received an information leaflet. They were asked to sign a consent form allowing the use of their anonymised data in the evaluation report. At each stage of the process, they were made aware of their right to withdraw. All personal data was managed and stored securely.

Interviewees were told every effort would be made to present the findings anonymously but that in some instances (due to small sample sizes) people might be able to identify who the finding was from. To help preserve anonymity, quotes and information on who the findings are from (for example, the Home Office, HMICFRS, the CoP, the IOPC) have been omitted unless essential to the reader's understanding of the evaluation findings.

All stages of the evaluation were overseen by the HMICFRS senior professional lead for Government Social Research. The evaluation methodology was signed off by members of the super-complaints [Gold Group](#), a group of senior officials at the three policing oversight organisations involved in the super-complaints system (HMICFRS, the IOPC and the CoP).

Interpreting the evaluation findings

The findings are qualitative and not all elements of the research were carried out for all seven super-complaints. However, the findings are expected to be relevant to other super-complaints.

The methodology allowed the researchers to identify where the impacts were due to the super-complaints system and where other factors may have played a part. It also allowed them to assess the contribution of the different elements of the super-complaints system to its outcomes.

The way the super-complaints system works has changed over time and continues to change as the policing oversight organisations learn more about what works for investigations. The findings reflect the super-complaints system at the time of the evaluation.

Findings: Has the super-complaints system contributed to changes in policing? If so, what changes and impact have been achieved?

To achieve the expected outcomes (changes in policing), the super-complaints system first needs to have produced the expected outputs.

Evidence for the outputs and outcomes was therefore examined as part of the evaluation.

Outputs from the super-complaints system

To help assess what impact super-complaints have achieved, expected outputs from each stage of the super-complaints process were examined to see if they were produced. The outputs from each stage are listed in [Figure 1](#).

The evaluation found evidence of these outputs being produced. The researchers noted that expected outputs had changed over time. For example, force and policing stakeholder action plans weren't requested for all super-complaints.

The following subsections outline the evidence for each output, categorised by the stage(s) of the super-complaints system to which they apply.

Super-complaints are prepared for submission, submitted to HMICFRS, assessed for eligibility and published

Outputs from these two stages of the system are:

- super-complaint submissions; and
- published eligible super-complaints.

At the time of the evaluation, 6 of the 16 designated bodies had submitted seven super-complaints on a range of different issues. One super-complaint (police sharing data for immigration purposes) was a joint super-complaint from two of the designated bodies.

All the super-complaints that had been submitted had been assessed as eligible, published, and moved on to the investigation stage.

They outlined shortcomings in how the police [safeguard vulnerable](#) individuals, uphold equality and maintain public trust. A common feature was their focus on issues that disproportionately affect women and/or people from ethnic minority backgrounds. Many highlighted failures to adequately protect vulnerable individuals, including [victims](#) of [domestic abuse](#), [stalking](#) and [modern slavery](#). Additionally, several raised issues about institutional accountability and transparency, such as [disproportionate](#) use of [stop and search powers](#) and police-perpetrated domestic abuse.

To provide evidence for their super-complaints, designated bodies mainly used:

- official reports and data;
- government policy frameworks and guidance;
- research produced by third parties (for example, non-governmental organisation reports and academic research); and
- case studies collected during their usual work.

Some designated bodies also incorporated findings from:

- freedom of information requests;
- news articles; and
- original surveys, interviews or focus groups carried out specifically to inform the super-complaint.

An investigation is planned and carried out

Researchers noted the super-complaints system allows investigations to be shared among the three investigating bodies, HMICFRS, the [College of Policing \(CoP\)](#) and the [Independent Office for Police Conduct \(IOPC\)](#). HMICFRS led five of the seven investigations, and the IOPC and the CoP led one investigation each.

Outputs from these two stages of the system are:

- terms of reference;
- lines of enquiry;
- new evidence to fill evidence gaps;
- feedback to forces included in the investigation;
- recommendations for forces and policing stakeholders;
- actions for HMICFRS, the CoP and the IOPC; and
- innovative and [promising practice](#) (that the CoP can assess and share with the policing sector).

Terms of reference and lines of enquiry

Terms of reference and lines of enquiry were developed and agreed for all seven super-complaint investigations. They specified the scope of the investigations and the investigation activities that would be carried out.

New evidence to fill evidence gaps

All the super-complaint investigations involved collecting new evidence to fill evidence gaps.

They all involved collecting evidence from a range of sources, which allowed triangulation (checking evidence from one source against that from another source). In all investigations, evidence and data were collected from forces and fieldwork was carried out that included interviews and focus groups with [police personnel](#). Most investigations used a review of IOPC case files and consultations and interviews with experts.

Investigations for many of the super-complaints involved collecting evidence on the victim experience and perspective. This involved the activities shown in Figure 3.

Figure 3: Collection of evidence on the victim experience and perspective

Super-complaint in which method was used	Analysis of case examples or testimonies provided by the designated body or victim support agencies	Qualitative interviews with victims	Online survey of victims	Focus groups or interviews with specialist victim support agencies
Police data sharing for immigration purposes	Yes	No	No	Yes
Police response to victims of modern slavery	No	No	No	No
Police use of protective measures in cases of violence against women and girls	No	Yes	No	No
Force response to police perpetrated domestic abuse	No	No	Yes	No
Police response to victims of sexual abuse from ethnic minority backgrounds who may be at risk of honour-based abuse	Yes	Yes	No	Yes

Super-complaint in which method was used	Analysis of case examples or testimonies provided by the designated body or victim support agencies	Qualitative interviews with victims	Online survey of victims	Focus groups or interviews with specialist victim support agencies
Police use of stop and search powers	No	No	No	Yes
Police response to stalking	No	Yes	No	Yes

It was noted that the level of detail provided in the rationale and description of the methodology of the super-complaint investigations varied across reports. However, over time, they have included more information about the methodology used.

Feedback to forces included in the investigation

All the investigations included fieldwork with forces. This involved interviews and/or focus groups with relevant personnel and frontline [officers](#) and sometimes included a review of relevant case files. Officials responsible for leading fieldwork often provided the force with feedback during the fieldwork. This included, for example, issues they were concerned about and things they thought the force was doing well.

Recommendations for forces and policing stakeholders

All seven investigation reports included recommendations from the investigating bodies for police forces and policing stakeholders.

A total of 86 recommendations were made across the seven super-complaints.

Recommendations often included several features:

- improving training and awareness for police personnel;
- improving policy consistency and clarity;
- revising policy and guidance;
- improving collaboration between relevant agencies;
- improving data collection and transparency regarding police practice; and
- improving victim support and safeguarding.

The report on the police response to stalking was the only report that consistently specified dates by which recommendations should be addressed.

Three super-complaints were included in a more detailed review of recommendations:

- Police data sharing for immigration purposes;
- Force response to police perpetrated domestic abuse; and
- Police use of stop and search powers.

Overall, 22 recommendations were made across these three super-complaints.

These were mostly to chief constables (12) and the Home Office (8), but also to [police and crime commissioners \(PCCs\)](#) (4), the [National Police Chiefs' Council \(NPCC\)](#) (2) and the Ministry of Justice (1). They were sometimes made to more than one organisation so these figures may not add up to the total number of recommendations.

The more detailed review of recommendations showed each single recommendation often required multiple changes or actions. Across the three super-complaints, the 22 recommendations included 84 changes for forces and stakeholders. The 12 recommendations for chief constables and the 4 for PCCs required action from all forces across England and Wales.

[Actions for HMICFRS, the CoP and the IOPC](#)

Six of the seven investigation reports included actions for HMICFRS, the CoP and the IOPC. There were 19 actions, the majority for the CoP (8 for the CoP, 6 for HMICFRS, 3 for the IOPC and 2 jointly for the IOPC and the CoP).

Actions often included several features:

- consideration by HMICFRS as to whether future inspection activity (either rolling or bespoke) and/or monitoring could include a review of the aspects of policing and issues raised in the super-complaint, and whether the issues are being addressed by forces;
- revision or development of [authorised professional practice \(APP\)](#) and/or the national policing curriculum by the CoP;
- improvement of CoP training and guidance;
- collaboration of policing organisations and relevant interested parties to review practice and lessons learned about the super-complaint issues; and
- IOPC and CoP reviews and assessments of practice in forces.

[Innovative and promising practice](#)

Examples of innovative and promising practice were identified during the investigations of three of the super-complaints:

- Police use of stop and search powers
- Force response to police perpetrated domestic abuse
- Police response to stalking.

This reflected a shift by investigators to try to say more in the reports about innovative and promising practice, and to feed these through to the CoP's [practice bank](#).

[Innovative police practice](#) means new ways of working in a police force. These may not have been formally evaluated but have the potential to produce better outcomes. Figure 4 shows examples identified.

Figure 4: Examples of innovative practice identified during super-complaint investigations

Area of policing	Examples
Training	• Innovative approaches to officer training. • Developing specialist domestic abuse training.
Development of new data collections and analysis	• Analysing disproportionality in stop and search. • Identifying domestic abuse cases involving police personnel. • Advanced analysis of digital evidence to improve the efficiency and effectiveness of stalking investigations.
Collaborative and multi-agency approaches	• Approaches to getting local communities involved concerning section 60 stop and search, and scrutiny such as youth panels and real-time feedback during major events such as Notting Hill Carnival. • Developing a multi-agency stalking intervention programme and a harm reduction unit.
Creation of new roles or teams	• Commissioning a bespoke independent domestic violence adviser specifically for victims who are police personnel. • Creating senior oversight roles and multi-disciplinary panels to ensure victim-focused investigations and independent scrutiny of police-perpetrated domestic abuse. • Developing dedicated stalking teams to screen crime reports to identify misclassified stalking cases and provide specialist advice to investigators.

The investigation findings are published

Outputs from this stage of the system are:

- investigation reports, which include recommendations and actions; and
- press releases and social media posts (from investigating bodies and designated bodies).

At the time of the evaluation, there were seven published investigation reports.

Interviewees were asked what they thought about the reports. They stated they had good awareness of the content and reported referring to it in the course of their work. Interviewees generally described the reports as thorough and useful; however, some interviewees felt the format could be more accessible.

Interviewees commented positively that the reports:

- were well written, detailed and thoroughly researched;
- provided a useful summary of the main issues;
- included evidence from victims, and it was useful to have their experience reflected in the reports;
- included a summary of the designated bodies' perspective in one place, which was felt to be useful; and
- were perceived as being neutral, allowing both sides of the argument to be heard (an interviewee from a designated body mentioned it was useful to see both the designated bodies' and the investigating bodies' views presented as a dialectical process).

Interviewees mentioned the reports being quite long, although there were differing opinions on the impact of this. Views included the following:

- The report's length is necessary because the issues addressed by the super-complaint "affect a lot of people's lives" and therefore "have to be done thoroughly".
- The length and format of the report "reduce its accessibility and make it difficult to find the parts relevant to me".
- The length of the report "makes it hard for ... decision-makers and policymakers to really grapple with the issues."

The views of the interviewees suggested different audiences needed different levels of detail in the report. While the long-form version may be of benefit to designated bodies, a shorter, more concise version may be more appealing and useful for members of the public or other stakeholders.

Press releases and social media posts weren't reviewed as part of the evaluation.

Reach of investigation reports

Web analytics for the HTML versions of two reports showed they were widely read, in particular, the summary, foreword and recommendations. A subset of readers read other parts of the reports closely, particularly after the first day of publication, but most people didn't read the whole report. The most common pattern was for readers to read the foreword and summary, then one to three other sections. All sections of the reports were read by some users, indicating all sections contained valuable information for a subset of readers.

Web analytics also showed people continued to read the reports long after the date of their publication. People spent more than 250 hours combined reading one of the reports in 2025 following its publication in 2024, and more than 160 hours combined reading the other report in 2024 following its publication in 2023.

The web analytics focused on viewings of HTML versions of the two reports. A PDF version of each report was also available, but it isn't possible to assess which sections of these reports were viewed or how often.

The findings from the web analytics are included in [annex D](#).

An internal post-project review is carried out and recommendations are followed up

Outputs from this stage of the system are:

- internal lessons learned sessions, so learning can be applied to future super-complaint processes;
- responses to the recommendations within 56 days of publication of the investigation report;
- responses to the actions; and
- force and policing stakeholder action plans.

Internal lessons learned sessions

Internal post-investigation reviews were held after every super-complaint investigation had been completed. They involved staff from the investigating bodies who had been involved in the super-complaint investigation and publication. They included discussion of each stage of the super-complaints system (eligibility assessment, investigation planning and design, and so on) to identify what had gone well, what hadn't gone well and ideas for improvement. Learning from these sessions informed the [internal operating guidance](#).

Responses to recommendations

Responses to the recommendations were requested from their recipients. Arrangements for this varied by super-complaint and over time. Time limits for responding to recommendations were introduced (56 days after report publication) and the NPCC and the [Association of Police and Crime Commissioners](#) were asked to collate responses for the super-complaint investigating bodies.

An interviewee from the Association of Police and Crime Commissioners explained that, following the stop and search super-complaint, they achieved a 100 percent response rate to the request for a response from PCCs and their mayoral equivalents, albeit after considerable chasing.

Responses from forces and stakeholders to the recommendations included information on:

- how training, policies, standards and guidance had been reviewed and/or updated;
- reviews of independent scrutiny panels; and
- data collections that had been introduced or amended to collect new data on the issues raised in the super-complaint.

[The discussion of super-complaints outcomes](#) includes further discussion of the changes made as a result of the recommendations and follow-up.

Responses to actions

Responses to the actions from HMICFRS, the CoP and the IOPC are published alongside the responses to recommendations 56 days after report publication. They showed the CoP had updated some of its APP and added content to its [public protection and safeguarding leadership programme](#) to reflect the super-complaint findings. They also showed the IOPC had published a special edition of Focus (its advice publication for police [professional standards departments](#)), focused on violence against women and girls, and had developed guidance for its own staff. This was in response to the super-complaint on the police response to stalking.

Many actions were reported as being assessed, in progress or being planned. This was particularly the case for actions asking HMICFRS to consider future inspection activity, where HMICFRS responses were that this would be considered but any proposed inspection activity would be subject to Home Office funding.

Legislative requirements are met

Outputs from this stage of the system are:

- acknowledgement of receipt of a super-complaint;
- eligibility decision;

- reports outlining progress on the investigation over the previous 56 days and next steps to be taken on the investigation in the next 56 days; and
- a published report on the outcome of the investigation, that includes actions to be taken by HMICFRS, the CoP and the IOPC and recommendations to any other party as considered appropriate.

The evaluation found all these outputs were produced for all super-complaints.

Outcomes from the super-complaints system

Having established that the expected outputs from the super-complaints system were produced, the evaluation tried to assess the extent to which the expected outcomes from the super-complaints system had been achieved.

Expected outcomes from super-complaints include:

- improvements being made to policing;
- increased awareness and understanding of the issues raised in the super-complaint and what changes need to be made to policing;
- an increase in the evidence for the issues raised in the super-complaint; and
- increased awareness of the super-complaints system and the bodies designated to submit super-complaints.

Super-complaints officials at HMICFRS, the CoP and the IOPC also identified some additional outcomes for victims or those harmed, and the general public:

- victims or those harmed sharing their story with police and investigating bodies;
- victims or those harmed seeing their issues raised with relevant parties; and
- the public, victims or those harmed seeing changes being made to policing.

Additional expected outcomes were identified for investigating bodies:

- investigating bodies having an agreed viewpoint on the issues raised in the super-complaint and how to effectively police them;
- super-complaint processes being improved;
- investigating bodies meeting the legislative requirements for the super-complaints system; and
- investigating bodies working effectively together across organisations.

During the evaluation, designated bodies reported additional outcomes to the researchers that hadn't been expected or identified before the evaluation.

The following subsections outline the evidence for some of these outcomes.

Evaluation evidence on outcomes

There was evidence from the desk-based research and the primary research that outcomes from super-complaints had been achieved to some extent. This supports a conclusion that the super-complaints system is achieving many of the outcomes expected.

Evidence of three of the expected outcomes identified in the theory of change wasn't collected as part of the evaluation. These outcomes were:

- increased awareness of the super-complaints system;
- victims or those harmed seeing issues being raised or changes being made to policing; and
- super-complaint processes being improved.

This was because it would have required additional evidence collection methods outside the agreed evaluation methodology; for example, evidence collected from people who had been in contact with the designated bodies or from members of the public.

While the recommendations review and interviews identified outcomes that had been achieved as a result of the super-complaints system, it is important to note that some interviewees felt the impact of super-complaints had been minimal. This was particularly the case for the super-complaint on stop and search. Interviewees reported a large amount of work already underway in the area around the same time the super-complaint was submitted and being investigated. They were unsure of the extent to which the outcomes seen were due only to the super-complaints system or only to the other work (or to both).

Changes to policing identified in the evaluation

The recommendations review (which involved reviewing published responses to recommendations from three super-complaints) showed forces had reported a range of changes in response to recommendations in super-complaint investigation reports.

Some forces said they had reviewed and updated training, policies and guidance in response to recommendations from all three super-complaints.

Some forces said they had reviewed their independent scrutiny panels and the support services they provided to victims. However, it wasn't clear what actions forces had then taken to address any gaps they identified from their reviews.

There were also reported changes in force policy, new data being collected (for example, adding a [flag](#) to identify police-perpetrated domestic abuse cases more accurately), new frameworks for minimum standards in policing and some new guidance from government departments to support policing.

Similarly, policing stakeholders reported changes they had made in response to the recommendations from these three super-complaints.

The Home Office reported agreeing in principle to the recommendations assigned to it in the three super-complaints. Two of the eight recommendations assigned to it had been addressed in the way suggested. It had amended the [annual data requirement](#) to collect information on police-perpetrated domestic abuse, resulting in greater information on police-perpetrated domestic abuse across all force areas. It had considered establishing a firewall between police and Immigration Enforcement. Instead, it took forward an alternative action to address the issues raised in the super-complaint.

However, it reported there were issues with the practicalities of making the necessary changes for the remaining six recommendations. For three of these, it took action that didn't directly address the recommendations but was in line with resolving the issue in policing. For example:

- Changes were made to the National Command and Control Unit enquiry database to better collect details of victims of crime, by crime type, at the initial point of referral; rather than the Home Office collecting demographic information on these referrals, which was the recommendation.
- Instead of introducing a firewall between the police and Immigration Enforcement, the Home Office introduced an Immigration Enforcement [Migrant](#) Victims' Protocol, which sets out that no immigration enforcement action should be taken against a victim while the investigation and prosecution proceedings are ongoing.

The NPCC reported that progress with some of the recommendations for the Council relied on actions being completed by the Home Office and the CoP before it could make progress.

In the interviews, interviewees reported amendments to existing policies or the development of new policies. It was noted how learning from the super-complaint investigations had informed training and guidance for forces. Examples interviewees gave were:

- learning from the super-complaint helping shape section 60 stop and search policy through changes to APP;
- a review of their organisation's standards and guidance for officers regarding section 60;
- the development of guidance for professional standards departments concerning investigations of police-perpetrated domestic abuse and supporting victims;
- work on making guidance concerning the issues raised in the super-complaints clearer, which is relevant to identifying and addressing police-perpetrated domestic abuse; and
- revised domestic abuse policies for forces.

Additional outcomes for victims or those harmed

Interviewees reported it was difficult to assess the direct impact, on victims or those harmed, of changes made or actions taken as a result of super-complaints. While changes had occurred that should theoretically improve victim experience – for example, operational changes or more understanding and improved culture regarding police-perpetrated domestic abuse – work hasn't been done to assess whether this is the case.

In addition, interviewees noted it was difficult to assess the impact of recent policy or guidance changes on policing. While many participants felt super-complaints had made some difference, some were uncertain whether new developments were having a meaningful impact for victims, offenders or the police. It was noted that it was also difficult to attribute changes to super-complaints alone.

Additional outcomes reported for designated bodies

A designated body interviewee described how the publicity produced by one super-complaint had encouraged further victims to come forward and increased the numbers of people their organisation was supporting or in contact with.

Designated body interviewees also reported how the work they had done when submitting a super-complaint had increased their expertise. They described how they were able to feed this into the media and their campaigns. One interviewee described how the groundwork they had done had given them a voice.

Another interviewee felt super-complaints had contributed to the Home Office being more open with them, in terms of consulting with them. This was because super-complaints had made them a sort of reference body for the issues the complaints covered.

Findings: Which elements of the super-complaints system are most relevant to achieving any changes in policing?

A central part of the evaluation was to try to understand the contribution different elements of the super-complaints system make (if any) to the impacts and changes to policing reported.

The evaluation showed elements at all stages of the system, from pre-submission to dissemination and follow-up, contribute to the impact of super-complaints.

Some of the outcomes identified in the evaluation can be seen as directly contributing to changes to policing. For example, interviewees reported that the recommendations were the biggest driver of changes to policing. Other outcomes were achieved more indirectly from super-complaints, such as those achieved by increasing awareness and understanding of the issues raised.

Direct drivers of changes to policing

From the interviews, researchers identified several direct drivers of changes to policing that resulted from the super-complaints system. These included:

- the super-complaints investigation;
- recommendations; and
- follow-up on recommendations.

The super-complaints investigation

Interviewees reported that changes to policing were made right from the start of the investigation. They felt the investigations had pushed forces included in the investigation to start reviewing processes and policies even before the publication of the investigation's findings.

One interviewee reported independently contacting heads of [professional standards departments](#) about [areas for improvement](#) that had been identified during the investigation case file review. This gave the force included in the investigation a head start on reviewing policies and processes before the findings and recommendations from the investigation were published.

Recommendations

Overwhelmingly, interviewees felt the recommendations in the super-complaint investigation reports led to changes in policing.

Interviewees mentioned that recommendations focused forces on the exact steps needed to make improvements. They mentioned that recommendations prompted local action and encouraged [police and crime commissioners](#) to review their force's actions on the issues raised in the super-complaints. They mentioned that they continued to refer to the recommendations to support their work.

It was reported that the recommendations from the [stop and search](#) super-complaint were useful for providing an independent view when speaking to ministers and that they held some weight due to them being from a super-complaint. There was also mention of recommendations supporting actions that were being proposed and recommendations being used to gain support for action from more senior [personnel](#).

A stakeholder also mentioned referring to the stop and search super-complaint where they saw an issue arising repeatedly to support a proposal for action to address it. They reported that it was easy to check what should be happening by referring to the recommendations and information in the investigation report.

Follow-up on recommendations

Interviewees mentioned that recommendations requiring a response within a limited time frame created a sense of urgency and momentum for change. An interviewee from the [Association of Police and Crime Commissioners](#) explained that collecting responses to the recommendations from forces ensured forces took notice of the recommendations. It also helped identify notable practice and local case studies, which could then be shared with other interested forces.

Indirect drivers of changes to policing

From the interviews, researchers identified several indirect drivers of changes to policing that resulted from the super-complaints system. These included:

- increased understanding of the issues raised in the super-complaints and their extent;
- increased local scrutiny;
- improved data recording practices;
- increased collaboration across organisations;
- increased publicity about the issues and public awareness; and
- enhanced profile of the designated bodies who had submitted super-complaints.

Increased understanding of the issues raised and their extent

Interviewees reported that super-complaints had increased their understanding of the issues the super-complaints raised and highlighted their extent and the need for change. This applied to the stop and search super-complaint and the police perpetrated [domestic abuse](#) super-complaint.

For example, interviewees reported how the police-perpetrated domestic abuse super-complaint:

- brought the issues described to their attention;
- increased their understanding of what police-perpetrated domestic abuse was and when it might happen;
- resulted in more general awareness and understanding of police-perpetrated domestic abuse; and
- had led to many people being familiar with the acronym for police-perpetrated domestic abuse (PPDA) and recognising it as an issue of concern.

One interviewee felt that increased understanding of police-perpetrated domestic abuse and familiarity with the terminology allowed for more consistent approaches across forces for dealing with cases. This was because it had helped people acknowledge what it was and understand it needed to be dealt with in a different way to dealing with general police [misconduct](#). They felt this had resulted in claims of police-perpetrated domestic abuse being taken more seriously.

One of the designated bodies reported increased understanding of the issues as well. It explained how preparing to submit the super-complaint required it to evaluate the information it held in a different way. The super-complaint had helped it verify concerns and identify trends and patterns it hadn't previously been aware of. This had increased its understanding of the issues it aimed to address.

Increased scrutiny

Interviewees reported that, as a result of the two super-complaints included in the interview phase of the evaluation, scrutiny of the issues raised in the super-complaints had increased. This was particularly the case for the police-perpetrated domestic abuse super-complaint.

Interviewees reported that this scrutiny was at a local level. For example, some interviewees reported having more contact with their chief constables to discuss the issues raised in the super-complaint and holding accountability meetings to make sure recommendations were addressed.

Additionally, interviewees reported that forces had worked with their [chief officers](#) to make operational decisions, such as suspensions and redeployment (in response to the police-perpetrated domestic abuse super-complaint). Other interviewees reported the super-complaint process prompted reviews of community scrutiny panel arrangements.

Improved data recording practices

Interviewees also reported data recording relating to the issues raised in the super-complaints had improved. For example, one interviewee reported a [flag](#) being added to their data collection systems to make sure police-perpetrated domestic abuse cases wouldn't be missed and would be accurately recorded.

Increased collaboration

Interviewees discussed how the investigation process and drafting of recommendations resulted in increased collaboration and communication between investigating bodies and other policing stakeholders. In some cases, this collaboration had continued after the super-complaint work was completed.

Another interviewee mentioned the super-complaint put them in touch with relevant people, including police and crime commissioners, who helped them track the progress of issues raised.

Increased publicity and awareness

Interviewees raised the point that super-complaints should be seen as part of a wider system that creates awareness about major issues. They explained the super-complaint investigation and publications generated publicity for major issues, increasing awareness and creating a focal point for future work.

It was noted that not all this publicity is driven by super-complaints. Interviewees mentioned other work that was taking place concerning violence against women and girls and stop and search at the same time as the super-complaints. In addition, there was a high-profile case relating to violence against women and girls at the same time as the police-perpetrated domestic abuse super-complaint. Interviewees reported that the publicity generated by the police-perpetrated domestic abuse super-complaint was part of growing public and media interest in these issues.

Nevertheless, interviewees said the police-perpetrated domestic abuse super-complaint shone a light on a specific issue that might not have been well publicised and understood, even if the broader problem of violence against women and girls was receiving media attention.

Raised profile of the designated bodies

An interviewee described how they had become aware of the work of the designated body through the super-complaint and suggested the super-complaints system might have raised the profile of such organisations.

One interviewee noted that, although the designated body that submitted the super-complaint was an existing stakeholder of theirs, the super-complaint process helped to reinforce concerns the designated body had raised with them before the submission.

The publicity around one super-complaint was felt to have encouraged further [victims](#) to come forward and created opportunities for designated bodies to attend meetings or be involved in media coverage. This presented opportunities to increase awareness and understanding and to contribute to ongoing discussions and actions concerning the issues raised.

Findings: What are the barriers to achieving changes in policing from the super-complaints system?

A number of barriers to achieving changes in policing from the super-complaints system were identified during the evaluation.

Capacity

A lack of capacity was reported across the board, affecting designated bodies submitting a super-complaint, those trying to carry out a timely investigation and policing stakeholders who were subject to the recommendations outlined in the investigation report. Interviewees noted super-complaint work was usually completed in addition to people's day jobs.

Interviewees from relevant subject matter areas in HMICFRS, the [College of Policing](#) and the [Independent Office for Police Conduct](#) reported the actions in the investigation report were difficult to resource, particularly if they didn't align with existing priorities in their organisations.

Interviewees felt the lack of capacity meant the system relied a lot on goodwill on all sides to help it work. They noted those working on super-complaints, while busy, are committed to having impact and making a difference. They queried the effect on super-complaints if fewer people with less interest in and commitment to super-complaints were involved.

Recommendations

Interviewees noted a number of challenges with the recommendations that may have limited their impact.

Policing stakeholder interviewees reported some of the recommendations weren't feasible to implement. They suggested more collaboration and possibly a more diverse range of people should be involved in developing recommendations to make sure they are achievable.

Other interviewees also mentioned the feasibility of implementing the recommendations and the challenge of doing so quickly. They cited the lengthy bureaucratic processes involved in updating the Home Office [annual data requirements](#) and the College of Policing's [authorised professional practice](#).

Interviewees also noted the number of recommendations forces and policing stakeholders receive – from super-complaints and, for example, HMICFRS inspections – was a challenge and contributed to recommendation fatigue. They reported that it made it difficult to prioritise which recommendations to address first or to assign resource to.

Follow-up on recommendations

The limited follow-up on recommendations and actions was a common theme among policing stakeholder interviewees. It was also raised as one of the most unexpected aspects of the super-complaints system.

Interviewees reported that, given the length of time needed to fully address recommendations, the requirement to provide a response on progress within 56 days of publication of the investigation report was too early to be meaningful. It also meant any progress made since that time wasn't recorded. Interviewees felt this meant there was no accountability or transparency relating to progress made as a result of recommendations.

Many recommendations contained multiple elements to be addressed. This made it difficult for forces and policing stakeholders – and the researchers – to assess progress. The researchers noted there were often large gaps in the forces' responses to the recommendations; they often reported they had addressed some aspects of a recommendation but not all.

In addition, there was rarely any mention in the responses to recommendations of how forces would monitor the changes made to make sure [officers](#) adopted them. Nor was there mention of evaluating the effectiveness or the longevity of the changes made. Therefore, although changes have been made, it isn't possible to assess if they were effective.

Investigation report

There were mixed views of the investigation report, with some suggesting this could be a barrier to changes in policing. Some interviewees appreciated the detailed and thorough report, while others felt it was too long for decision-makers and didn't clearly communicate the main messages.

The researchers noted that, while the majority of interviewees mentioned recommendations causing changes and action, interviewees didn't mention the report as directly driving changes in policing.

Timeliness

The time for a super-complaint to be completed was another barrier identified during the evaluation. Overall, the length of time from submission of a super-complaint by the designated body to publication of the investigation report and recommendations ranged from 22 months to 31 months. But there was no detailed or consistent information available on the breakdown of time between setting up the team and the investigation, carrying out the investigation, developing and agreeing recommendations and actions, and drafting and finalising the report.

Some interviewees felt the long length of time for the investigation to be completed and published meant momentum was lost.

In addition, where the super-complaint was made in the context of growing interest in the issues raised, the lengthy time for the investigation delayed the contribution those involved in the investigation and super-complaint could make to ongoing public discussion.

Another barrier related to this was the lack of detail about the methodology used for research by the designated bodies and the evidence presented as support for their super-complaints. The researchers noted this may have limited the use of this evidence in the subsequent investigation and resulted in work being repeated.

Limiting super-complaints to Home Office-designated bodies

A lack of transparency or regular review of the designated body list was also reported as a barrier to changes in policing, as issues in policing may change over time. It was felt important that the list of designated bodies reflected these issues.

Findings: Are there any unintended consequences of the super-complaints system?

Unintended consequences are outcomes that occur that weren't expected or planned. They can be positive or negative.

Interviewees were asked about this and reported several features, described below.

Increased workload

Interviewees reported an increased workload due to super-complaints, particularly for work required to address recommendations. In addition, as a result of the police-perpetrated domestic abuse super-complaint, interviewees reported more attention being given to managing [misconduct](#), which had increased workload.

Delays due to the challenges of multiple investigating bodies working together

One of the expected outcomes from the super-complaints system was investigating bodies working effectively together. This was achieved, but there was an unintended consequence of multiple organisations working together: lengthy delays to completing super-complaint investigations and publishing findings. These delays were a result of the difficulties of working together, for example, different IT systems, lack of a common framework, and more people who needed to be involved in decision-making, the investigation and sign-off of outputs.

New contacts and collaboration

Interviewees reported that super-complaints had provided them with new contacts in their areas of work, or had made more-focused collaboration possible.

Findings: Would the outcomes from the super-complaints system have occurred anyway (without the super-complaints system)?

An important part of any evaluation is to consider whether the outcomes identified would have happened anyway. In this case, whether the outcomes seen would have happened without the super-complaints system being in place.

Interviewees identified several things they felt wouldn't have occurred if the system didn't exist. These were:

- increased understanding of the issues as a result of the investigations and, in particular, the increased understanding and awareness of the magnitude of the issues identified;
- increased evidence generated by the investigations, in one place, which can be cited;
- raised profile of designated bodies, as a result of submitting a super-complaint and the attention this brought; and
- designated bodies' increased understanding of the issues, due to the need for them to identify patterns and trends in the cases they were aware of as part of the super-complaint submission process.

Views were mixed about whether the changes that had been made, for example, in response to the recommendations, would have occurred anyway. This was particularly the case for the [stop and search](#) super-complaint. Interviewees reported a large amount of work already underway in this area around the time the super-complaint was submitted and investigated.

However, other interviewees reported recommendations were a major driver of changes to policing, and that the follow-up process had created a sense of urgency to make changes.

Another described the police perpetrated [domestic abuse](#) super-complaint as a “landmark moment”, which shone a light on a specific issue that might not have been well publicised and understood, even if the broader problem of violence against women and girls was receiving media attention.

Conclusions

There were five research questions for this evaluation:

1. Has the super-complaints system contributed to changes in policing? If so, what changes and impact have been achieved?
2. Which elements of the super-complaints system are most relevant to achieving any changes in policing?
3. What are the barriers to achieving changes in policing from the super-complaints system?
4. Are there any unintended consequences of the super-complaints system?
5. Would the outcomes from the super-complaints system have occurred anyway (without the super-complaints system)?

Research question 1: Has the super-complaints system contributed to changes in policing? If so, what changes and impact have been achieved?

The evaluation found expected outputs from the super-complaints system had been produced and had contributed to the impact of the system.

Seven super-complaints had been submitted, published and investigated. These brought to light the issues raised, many of which were failures by the police to adequately protect [vulnerable](#) individuals, including [victims](#) of [domestic abuse](#), [stalking](#) and [modern slavery](#).

The published investigation reports had added to the evidence for the aspects raised in the super-complaints, providing robust evidence all in one place. This can be cited by designated bodies and others, and can easily be referred to by policing stakeholders, forces, policymakers and others when agreeing actions to be taken in policing and when discussing priorities.

Recommendations had been made and the follow-up showed many had been addressed or actions were underway.

Promising and [innovative practice](#) had been identified, which the [College of Policing](#) could assess and share with the policing sector to apply.

There was evidence of expected outcomes being achieved, at least to some extent, and evidence of the super-complaints system helping to drive improvements in policing. Forces and policing stakeholders reported taking action in response to the recommendations, including updating training, policies and guidance; and reviewing independent panels and the support services they provided to victims. Interviewees, including those from the designated bodies who had raised the super-complaints, reported an increase in awareness and understanding of the issues raised and of the changes needed. And the Home Office reported establishing new data collections to improve monitoring of the issues raised. It also reported making some changes which, although not directly addressing the recommendations made, were in line with resolving the issues raised.

Research question 2: Which elements of the super-complaints system are most relevant to achieving any changes in policing?

The evaluation found there were direct and indirect drivers stemming from the super-complaints system that contributed to changes in policing and addressing the issues raised.

The main direct drivers were:

- recommendations; and
- recommendation follow-up.

The recommendations laid out what changes needed to be made and provided an independent view that could be used to support improvements in policing. Interviewees reported that the follow-up on recommendations, where those subject to the recommendations were asked to respond within 56 days, created a sense of urgency and momentum for change.

Other drivers were more indirect. The main ones were:

- the increased understanding and awareness among forces, policing stakeholders and designated bodies of the issues raised in the super-complaints and the extent of them; and
- an increased awareness of the need for change.

Increased media coverage and publicity about the super-complaints contributed too.

Increased scrutiny, for example, by chief constables or [police and crime commissioners](#), was another indirect driver of changes to policing that interviewees reported.

Interviewees also reported the collaboration the super-complaints system requires, for example, between the investigating bodies and those subject to the recommendations being made, as supporting changes to policing. This was particularly the case when this collaboration continued after the super-complaints work was completed.

Designated bodies reported how their profile had been raised and how this had created opportunities for them to attend meetings with policing stakeholders and to interact with the media.

Research question 3: What are the barriers to achieving changes in policing from the super-complaints system?

Barriers included:

- lack of capacity;
- follow-up on recommendations being too early to be meaningful;
- recommendations not being feasible to implement and challenging to address quickly;
- recommendation fatigue;
- recommendations containing multiple elements;
- responses rarely detailing how forces would monitor or evaluate changes; and
- the length of the investigation.

A lack of capacity was reported across the board, affecting designated bodies submitting a super-complaint, those trying to carry out a timely investigation and policing stakeholders who were subject to the recommendations outlined in the investigation report. Interviewees felt the lack of capacity meant the system relied a lot on goodwill on all sides to make sure it led to changes in policing.

The limited follow-up on recommendations made to the policing sector and actions for HMICFRS, the College of Policing and the [Independent Office for Police Conduct](#) was a common theme among interviewees. Although the follow-up on recommendations 56 days after publication created a sense of urgency and momentum for change, policing stakeholders felt this timing was too early to allow meaningful reporting.

Policing stakeholders reported some recommendations weren't feasible to implement and were challenging to address quickly, due to the lengthy bureaucratic processes often involved. And the number of recommendations from super-complaints and elsewhere, such as HMICFRS inspections, contributed to recommendation fatigue and made prioritisation difficult.

Many recommendations contained multiple elements to be addressed. This made it difficult for forces and policing stakeholders – and the researchers – to assess progress. The researchers noted there were often large gaps in the forces' reports of progress; they often reported they had addressed some aspects of a recommendation but not all.

There was rarely any mention in the responses to recommendations of how forces would monitor the changes made to make sure [officers](#) adopted them. Nor was there mention of evaluating the effectiveness or longevity of the changes made. Therefore, although changes may have been made, it wasn't possible to know if they were having the intended effects.

The length of time the investigation took was mentioned as resulting in a loss of momentum in addressing the issues raised and limiting the contribution that could be made in the public domain to ongoing discussions of the issues.

Research question 4: Are there any unintended consequences of the super-complaints system?

Interviewees reported a few unintended consequences.

They reported increased workloads for:

- designated bodies, due to more victims or those harmed coming forward; and
- police forces, due to closer scrutiny in forces concerning the issues raised in the super-complaints.

They also reported delays in the completion of investigations and publication of investigation findings. This was caused by the difficulties of investigating bodies working together across organisations with different systems and processes, and more people being involved in decision-making and signing off outputs.

Research question 5: Would the outcomes from the super-complaints system have occurred anyway (without the super-complaints system)?

Several outcomes were identified as being due to super-complaints specifically.

Many recommendations were addressed, and the follow-up process created a sense of urgency to changes being made to policing.

The super-complaints system increased the evidence for the issues raised. The investigations took multi-method approaches that provided robust findings. These were presented in single reports, making the evidence easily accessible and available for review and citation.

The designated bodies increased their understanding of the issues. This was due to the need for them to identify patterns and trends in cases reported by people who contacted them for help or support as part of the super-complaint submission process.

The profile of designated bodies was increased, through the process of submitting a super-complaint and the attention this brought.

Next steps

Since the evaluation was carried out, the super-complaints investigating bodies have published a [memorandum of understanding](#). This sets out agreed ways of working to carry out super-complaint investigations trilaterally.

The three organisations have also developed (alongside the completion of the evaluation) internal operating processes and guidance. These are to support effective cross-organisation working and to make sure lessons from super-complaint investigations, about what worked and what could be improved, are recorded and inform future investigations.

This work has recorded areas of learning highlighted in the evaluation findings. It includes documented processes, templates and guidance to support:

- the planning of the scope of investigations to make sure they are focused on areas that will address any gaps in evidence or knowledge, lead to change and have impact;
- the development and publication of timely, accessible investigation reports; and
- effective approaches to developing recommendations that are informed by working with stakeholders and that support transparency and accountability concerning impact and improvements made.

Further consideration could be given to how recommendations and actions from super-complaints are followed up, including:

- how they could be monitored and tracked and who would be responsible for this; and
- when follow-up could occur and the resource implications and funding arrangements.

This should be considered with reference to the police reforms concerning evaluation and follow-up on recommendations. These are set out in the 2026 Home Office white paper, '[From local to national: a new model for policing](#)'.

Annex A: Theory of change

Figure 5: Super-complaints system theory of change

Inputs	Funded resource		Unfunded resource		
	Home Office: system set-up and oversight HMICFRS: management of the super-complaints system		Designated bodies Investigating bodies: HMICFRS, the College of Policing (CoP), the Independent Office for Police Conduct (IOPC) Super-complaints Gold Group: HMICFRS, the College of Policing, the IOPC Subject matter experts: HMICFRS, the CoP, the IOPC, the Home Office		
Stage	Submission	Investigation	Publication	Post-publication	Legislative requirements
Activities	Super-complaints are prepared for submission and submitted to HMICFRS by a designated body. Super-complaints are assessed for eligibility by HMICFRS, the CoP and the IOPC and published by HMICFRS.	The scope of the super-complaint investigation is planned by HMICFRS, the CoP and the IOPC. An investigation of the super-complaint is carried out by HMICFRS, the CoP and the IOPC.	The investigation findings are published by HMICFRS.	Recommendations are followed up by or overseen by HMICFRS, the CoP and the IOPC. An internal post-project review is carried out by HMICFRS, the CoP and the IOPC.	Legislative requirements are met.
Outputs	Super-complaint submissions Published eligible super-complaints.	Terms of reference Lines of enquiry New evidence to fill evidence gaps Feedback to forces included in the investigation Recommendations for forces and policing stakeholders Actions for HMICFRS, the CoP and the IOPC Innovative and promising practice for the CoP to assess and share with the policing sector to apply.	Super-complaint investigation report, including recommendations and actions Press releases and social media posts from investigating bodies and designated bodies.	Responses to the recommendations within 56 days of investigation report publication Responses to the actions Force and policing stakeholder action plans Internal lessons learned sessions so learning can be applied to future super-complaint processes.	Acknowledgement of receipt of a super-complaint Eligibility decision Progress reports outlining progress on the investigation made over the previous 56 days and next steps to be taken on the investigation in the next 56 days Published reports on the outcome of the investigation, with actions to be taken by HMICFRS, the CoP and the IOPC, and recommendations to any other party as they consider appropriate.
Outcomes	Victims or those harmed can share their stories with police and investigating bodies Designated bodies have a better understanding of the issues raised with them and are better able to support the people who contact them Increased knowledge and understanding of issues in policing Victims or those harmed are able to see issues being raised More victims or those harmed coming forward (to police and designated bodies) Increased interest in and discussion of the issues raised in the super-complaint Increased awareness of designated bodies Increased awareness of the super-complaints system.	Evidence gaps are identified Investigating bodies working effectively together across organisations Forces included in the investigation are aware of actions needed in their force Investigating bodies having an agreed viewpoint on the issues and how to effectively police them.	Forces and policing stakeholders are aware of changes that need to be made HMICFRS, the CoP and the IOPC are aware of actions they need to take The CoP is aware of potential new innovative and promising practice Increased evidence, easily accessible in one place Police, stakeholders and public have increased awareness of policing the super-complaint issues Forces and policing stakeholders make changes to policing HMICFRS, the CoP and the IOPC address actions Victims or those harmed can see issues being raised Increased awareness of the super-complaints system Increased awareness of designated bodies.	Improvements made to policing Public and victims see changes being made Increased interest in and discussion of issues raised in the super-complaint Forces held to account for recommendations made to them Super-complaint processes improved.	Investigating bodies meeting legislative requirements for the super-complaints system.
Impacts	Improved policing Increased trust in policing Investigative bodies working more effectively together outside super-complaints work (in other areas) Designated bodies are better able to support people who contact them More victims or those harmed coming forward		More victims or those harmed contacting designated bodies and receiving support Increased funding from central government and third-party charity sectors (including for designated bodies) Designated bodies are able to gain more traction for their work.		

Annex B: Accessible version of the theory of change

A theory of change maps inputs, activities, outputs, outcomes and impacts (see the [Magenta Book](#)).

The theory of change developed for the super-complaints system includes the following elements.

Inputs

There are two main inputs to the super-complaints system: funded resource and unfunded resource.

Funded resource

- Home Office: system set-up and oversight
- HMICFRS: management of the super-complaints system.

Unfunded resource

- Designated bodies
- Investigating bodies: HMICFRS, the [College of Policing \(CoP\)](#), the [Independent Office for Police Conduct \(IOPC\)](#)
- Super-complaints [Gold Group](#): HMICFRS, the College of Policing, the IOPC
- Subject matter experts: HMICFRS, the CoP, the IOPC, the Home Office.

Stages

There are five stages in the super-complaints system:

- Submission
- Investigation
- Publication
- Post-publication
- Legislative requirements.

Each stage of the super-complaints system involves different activities, which result in specific outputs and outcomes.

Activities

A range of activities is carried out as part of the super-complaints system.

At the submission stage

- Super-complaints are prepared for submission and submitted to HMICFRS by a designated body.
- Super-complaints are assessed for eligibility by HMICFRS, the CoP and the IOPC and published by HMICFRS.

At the investigation stage

- The scope of the super-complaint investigation is planned by HMICFRS, the CoP and the IOPC.
- An investigation of the super-complaint is carried out by HMICFRS, the CoP and the IOPC.

At the publication stage

The investigation findings are published by HMICFRS.

At the post-publication stage

- Recommendations are followed up by or overseen by HMICFRS, the CoP and the IOPC.
- An internal post-project review is carried out by HMICFRS, the CoP and the IOPC.

At the legislative requirements stage

[Legislative requirements](#) are met.

Outputs

Outputs are produced as a result of the super-complaint activities.

Outputs from the submission stage

- Super-complaint submissions
- Published eligible super-complaints.

Outputs from the investigation stage

- Terms of reference
- Lines of enquiry
- New evidence to fill evidence gaps
- Feedback to forces included in the investigation
- Recommendations for forces and policing stakeholders
- Actions for HMICFRS, the CoP and the IOPC

- Innovative and [promising practice](#) for the CoP to assess and share with the policing sector to apply.

Outputs from the publication stage

- Super-complaint investigation report, including recommendations and actions
- Press releases and social media posts from investigating bodies and designated bodies.

Outputs from the post-publication stage

- Responses to the recommendations within 56 days of investigation report publication
- Responses to the actions
- Force and policing stakeholder action plans
- Internal lessons learned sessions so learning can be applied to future super-complaint processes.

Outputs from the legislative requirements stage

- Acknowledgement of receipt of a super-complaint
- Eligibility decision
- Progress reports outlining progress on the investigation made over the previous 56 days and next steps to be taken on the investigation in the next 56 days
- Published reports on the outcome of the investigation, with actions to be taken by HMICFRS, the CoP and the IOPC, and recommendations to any other party as they consider appropriate.

Outcomes

The theory of change identified the expected outcomes from the super-complaints system.

Outcomes from the submission stage

- [Victims](#) or those harmed can share their stories with police and investigating bodies
- Designated bodies have a better understanding of the issues raised with them and are better able to support the people who contact them
- Increased knowledge and understanding of issues in policing
- Victims or those harmed are able to see issues being raised
- More victims or those harmed coming forward (to police and designated bodies)
- Increased interest in and discussion of the issues raised in the super-complaint
- Increased awareness of designated bodies
- Increased awareness of the super-complaints system.

Outcomes from the investigation stage

- Evidence gaps are identified
- Investigating bodies working effectively together across organisations
- Forces included in the investigation are aware of actions needed in their force
- Investigating bodies having an agreed viewpoint on the issues and how to effectively police them.

Outcomes from the publication stage

- Forces and policing stakeholders are aware of changes that need to be made
- HMICFRS, the CoP and the IOPC are aware of actions they need to take
- The CoP is aware of potential new innovative and promising practice
- Increased evidence, easily accessible in one place
- Police, stakeholders and the public have increased awareness of policing the super-complaint issues
- Forces and policing stakeholders make changes to policing
- HMICFRS, the CoP and the IOPC address actions
- Victims or those harmed can see issues being raised
- Increased awareness of the super-complaints system
- Increased awareness of designated bodies.

Outcomes from the post-publication stage

- Improvements made to policing
- Public and victims see changes being made
- Increased interest in and discussion of issues raised in the super-complaint
- Forces held to account for recommendations made to them
- Super-complaint processes improved.

Outcomes from the legislative requirements stage

Investigating bodies meeting legislative requirements for the super-complaints system.

Impacts

The following impacts were identified:

- Improved policing
- Increased trust in policing
- Investigating bodies working more effectively together outside super-complaints work (in other areas)
- Designated bodies better able to support people who contact them

- More victims or those harmed coming forward
- More victims or those harmed contacting designated bodies and receiving support
- Increased funding from central government and third-party charity sectors (including for designated bodies)
- Designated bodies able to gain more traction for their work.

Annex C: Additional information about the evaluation methodology

Recommendations review

Progress against each recommendation was assessed by a member of the evaluation team and given a red, amber, green or black rating, as defined in Figure 6. A sample of the recommendation ratings was then checked by another researcher. In addition, the evaluation team discussed more complex cases before deciding on a rating. This helped make sure the ratings given were consistent across the super-complaints included in the review.

Figure 6: Colour-coded rating scale used for assessing force and policing stakeholder responses to the recommendations made to them in super-complaints reports (as at 56 working days after investigation report publication)

Rating	Description
Green	The force or stakeholder said it had made the necessary change(s) associated with the recommendation.
Amber	The force or stakeholder said it is currently implementing plans to make the necessary change(s) associated with the recommendation.
Red	The force or stakeholder said it had plans to start implementing change(s) associated with the recommendation but hadn't made any changes at the time.
Black	The force or stakeholder didn't say it had plans to make change(s) in line with the recommendation or it said it didn't accept the recommendation.

Primary research with designated bodies, investigating bodies and policing stakeholders

NVivo was used to carry out the analysis, which involved thematically coding the interview transcripts. This was done in two main stages.

First, a code was allocated using pre-defined categories:

- Impact: text describing a specific change resulting from a super-complaint.
- Unique: text assessing whether a change (including those implemented more quickly than originally proposed) was directly attributable to a super-complaint or likely to have occurred anyway (without super-complaints).
- How: text explaining what triggered a change or how awareness of an issue emerged.
- Unintended: text describing unexpected outcomes that occurred as side-effects of a super-complaint.
- Other: text that doesn't fit into the main categories.

An additional code was introduced later in the process:

- Blockers: text referencing challenges or barriers that reduced or prevented impact.

Second, thematic coding was carried out in each main coding category.

Recurring themes in each category were identified and coded.

This coding approach combined inductive and deductive methods, allowing themes to emerge from the data while also aligning with predefined analytical frameworks.

Quality assurance

A 'theming workshop' was held following the first coding stage. During this session, the interviewers reviewed and discussed emerging themes, identified overlaps and refined the thematic structure. Once consensus was reached on the final set of themes, transcripts were recoded to reflect these agreed themes. The final themes are presented in this report.

Microsoft 365 Copilot was used at the end of the analysis to quality assure the coding and write-up of findings. This was a version of Copilot that can securely access official documents held by HMICFRS. Copilot was prompted to look for findings that were reported in the evaluation report in the original, anonymised, interview transcripts. Once the findings were located, the researchers assessed whether the transcripts provided sufficient evidence for the statements in the write-up, and whether they agreed with the interpretation.

Annex D: Web analytics of two published super-complaint reports

Police use of stop and search powers

The investigation report and a press release were published on 15 December 2023.

Figure 7 shows how many times these were viewed.

Figure 7: Web analytics for super-complaint report on police use of stop and search powers

Content	In the first 24 hours	In the first week
Press release	323 views (154 unique)	639 views (284 unique)
HTML report	568 views (284 unique)	1,171 views (541 unique)
PDF report	81	137

The web analytics indicated a subset of website users who read the report on the first day of its release did so quickly. A subset of highly engaged users continued to read the report over the course of the following week. These users read the report more closely and were more likely to read multiple chapters.

Most user time was concentrated on the summary.

The average time spent viewing the summary increased from 6 minutes 32 seconds per visit in the first 24 hours to 10 minutes 12 seconds per visit in the first week after publication.

People also spent considerably longer reading the other sections of the report in the first week compared to the first 24 hours. Some readers frequently returned to the report over the course of the first week.

A common pattern was for people to read the summary, then spend some time reading just one or two other sections. Very few people read the report in its entirety, but the secondary sections readers focused on were varied, indicating most sections contained valuable information for a subset of users.

This analysis indicates users in the one-week period were, on average, more interested than users in the 24-hour period. Users in the first 24 hours were comparatively much more likely to read the summary without navigating to any other sections.

The report continued to be widely read long after it was published. The report was published in December 2023. In 2024, people spent more than 160 hours combined reading the report, and in 2025, people spent more than 70 hours combined reading the report.

Police response to stalking

The investigation report was published on 27 September 2024.

Of the sections in the HTML report, the foreword had the highest number of views (1,153 views), followed by the introduction (864 views) and the summary (546 views). The remaining sections of the report had between 113 and 262 views, with the number of views being fairly evenly spread.

In the first two weeks after the report's publication, people spent a combined 358 hours reading the HTML report.

The most common reading pattern was for people to read the foreword and the introduction, then stop reading the report. The second most common reading pattern was for people to read the foreword, the introduction and the summary. Despite this reading pattern being less common, people who reached the summary spent a lot of time with it open.

After the foreword, summary or introduction, the most read sections of the report were as follows. The times shown are the combined times spent reading each section in the first two weeks after publication:

- List of recommendations (46.5 hours)
- Background: [stalking](#) and the police response (21.1 hours)
- Identifying and recording stalking crimes (11.7 hours)
- [Stalking protection orders](#) (7.9 hours)
- Responding to risk (6.6 hours).

The HMICFRS communications team analysed individual visit logs. They found that some people read the list of recommendations as their primary focus, in the same way other readers might use the summary.

The report continued to be widely read long after it was published. The report was published in September 2024. In 2025, people spent more than 250 hours combined reading the report.

