

Warwickshire

Joint Audit and Standards Committee

Report Summary

Meeting Date: Wednesday 22 January 2025

Subject: Police Standards, Ethics, and Complaints

Contact details:

- Part 1: Paul Thompson: Head of PSD, Warwickshire Police
- Part 2: David Patterson: Assurance and Scrutiny, OPCC

1. Purpose of the report

The purpose of this two-part report is for both the Professional Standards Department (PSD), and the Office of the Police and Crime Commissioner (OPCC), to provide an update to the JASC on matters relating to police standards, ethics, and complaints.

2. Recommendation

To review and comment on the report.

3. Background

The Terms of Reference for the JASC requires the committee to be enabled to have oversight and to provide independent review of the effectiveness of the adherence to appropriate standards and ethics by the Chief Constable, the Police and Crime Commissioner (PCC), and Warwickshire Police.

4. Executive Summary

This report provides a summary of the national, regional, and local developments that have taken place since this subject matter was last reported to the 10 July 2024 meeting of the JASC.

The focus and format of this report has been amended at the request of the JASC to incorporate a greater emphasis on key performance data and identifiable trends.

Part 1: PSD

1. National developments

1.1. Home Office

A new timetable for the amendments to the Home Office Review 'The process of police officer dismissals'¹ has now been released: -

- Dismissals: May 2025.
- Vetting and standards (Project and Regulation): December 2025.
- Police Appeal Tribunals (PAT) (Routes of appeal to PAT for CC's and IOPC): December 2025.
- Suspension Regulations: September 25.
- Legislative changes to include anonymity for firearms officers, review of delays in misconduct processes, White Paper on police reform, and IOPC review: December 2025.

The White Paper will propose making further fundamental changes, including the tests and thresholds applied across the police discipline system.

1.2. Angiolini recommendations.

On 29 February 2024, The 'Angiolini Inquiry Part 1 Report'² was published. Part 1 of the Inquiry looked into the actions of off-duty Metropolitan police officer Wayne Couzens. The Report makes 16 recommendations designed to ensure that everything possible is being

¹ [Home Office Review: The process of police officer dismissals \(accessible\) - GOV.UK](#)

² [The Angiolini Inquiry – Part 1 Report](#)

done to prevent those entrusted with the power of the office of constable from abusing that power.

All police forces are currently engaged in a monthly reporting process with the National Police Chief's Council (NPCC) and the Home Office to provide progress reports on specific recommendations. The reporting process will continue throughout 2025.

2. Regional / Local

2.1. Regional Scrutiny Panel

Scrutiny is an integral part of ensuring Professional Standards Department maintain policing standards to ensure the PSD Appropriate Authority (AA) decision making is reasonable, justified, and proportionate based on the facts of the alleged breaches of the Standards of Professional Behavior³.

The Scrutiny Panel will provide a method of reviewing AA decision making to ensure that public trust and confidence is maintained by upholding high standards and deterring misconduct to protect the public. The aim of the Panel is to understand different views and perspectives and gain learning and share this with other AA's. It will also provide a consistent approach across the police forces of the West Midlands Region.

2.2. Culture and behaviour

Chief Supt. Emma Bastone is presently leading a project to improve the standards, culture and behaviour within Warwickshire Police. Further details will be available for the next JASC meeting as the initiative progresses. From a PSD perspective we will be looking to recruit PSD Ambassadors, who will receive extra training in the area of police complaints/conduct and will act as a conduit between the workforce and PSD.

3. Conduct matters

The JASC have requested data on the 'conduct' matters that have come to the attention of PSD other than through a police complaint made by a member of the public: -

³ [Final Home Office Guidance.pdf](#)

3.1. Finalised cases

Category	2022	2023	2024	Total
Abuse of position for other purpose	2		1	3
APSP			1	1
Decisions		2	2	4
Disclosure of information		3	4	7
Discreditable conduct	9	13	18	40
General level of service	4		4	8
Handling of information			3	3
Handling of or damage to property			2	2
Other	2		3	5
Other policies and procedures	4	1	2	7
Other sexual conduct	2	3	8	13
Overbearing or harassing behaviours	1		1	2
Race	3		2	5
Sexual assault		3	2	5
Sexual harassment		6	1	7
Unprofessional attitude and disrespect	4	3	2	9
Use of force		2	2	4
Use of police systems	1		6	7
Use of police vehicles		1	2	3
Searches of premises and seizure of			4	4
Police action following contact			3	3
Impolite language			1	1
Total	32	37	74	143

Figure 1.1: Finalised conduct volumes

These include cases that resulted in proceedings, RPRP and No Case To Answer. (They may involve multiple officers or staff members).

3.2. Total number of conduct cases

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
2022				1	6	4	7	12	1	4	3	27	65
2023	9	8	1	2	15	14	3	2		30	12	35	131
2024	10	8	11	34	8	13	29	8	37	11	7	7	183
• Finalised	9	4	10	31	5	8	25	0	31	6	1	2	132
• Live	1	4	1	3	2	4	4	8	6	5	6	3	47
• Sub-Judice	0	0	0	0	1	1	0	0	0	0	0	2	4

Figure 1.2: Total number of conduct cases.

The number of finalised cases may include an allegation for multiple officers/ staff member, and or cases were there may be multiple categories of allegations per officer/staff member. Consequently, the total above will not equal the total in the 1.1 table.

3.3. Fraud

The JASC have also requested data on conduct cases relating to Fraud; there are currently no such cases known to PSD.

4. Court proceedings / Accelerated Hearings

The JASC have requested a precis of those cases which are subject of gross misconduct proceedings / court proceedings. PSD currently have considerable demand at the present time:

- 14 x officers and staff currently suspended.
- 7 x Accelerated Gross Misconduct Hearings (AGMH) to be heard.
- 9 x Gross Misconduct Hearings (GMH) with Legal Services for progression, dates to be confirmed.

4.1. Cases of note:

1. **CM/00011/23:** Conduct case. Special Police Constable accessing incident reports in the area where he lives, without a policing purpose. Officer has resigned. AGMH 05/02/25
2. **CM/00022/24:** Conduct case. Student officer has been convicted of driving with excess alcohol. Officer is currently suspended. Case is

subject to a Newton⁴ hearing in January 2025. Once complete consideration for an AGMH.

3. **CM/00021/23:** Conduct case. Student officer has been charged with sexually assaulting a female member of the shift whilst on duty. Officer has pleaded not guilty, and the trial is set commence 03/02/2025. Officer is currently suspended. Case is held sub-judice by PSD.
4. **CM/00006/23:** Conduct case. Police Constable. On 20 December 2024, the officer was found guilty of six counts of sexual activity with a child and two counts of causing a child to engage in sexual activity. He was remanded in custody and will be sentenced on 23 January 2025. AGMH to be heard on 19 March 2025. The officers pay has been stopped, as per Police Regulations,
5. **CM/4/24:** Conduct case. Police Det. Sergeant remanded in custody for breaching court bail conditions following a domestic incident. The officer was already under suspension due to a complaint involving Abuse of Position for a Sexual Purpose (APSP). He subsequently retired from the force. AGMH heard in June 24 which concluded he would have been dismissed if still a serving officer. Placed on the barred list. In July 24 he pleaded guilty in court to four counts of assault and was sentenced to 18- weeks in prison. (Time already served). CO/300/22 remains live, and a GM Hearing will be heard in due course.
6. **CM/00023/24:** Conduct case. Special Police Constable has been convicted of two assaults that occurred during a 'team night out.' Officer has resigned, found guilty at Magistrate's Court for 2 x assaults. AGMH will be heard on 18th March 25.
7. **CO/290/22:** Complaint case. Police constable has been charged with assault following a complaint of excess force whilst arresting a male. Plea and direction hearing on 21 January 25. Case is held sub-judice by PSD.

⁴ Newton hearing: Used where the two sides offer such conflicting evidence that a judge sitting alone tries to ascertain which party is telling the truth. It is generally used when a defendant pleads guilty to an offence but factual issues (relating, for example, to the appropriate sentence) need to be resolved between the prosecution and defence.

5. Vetting

As requested by the JASC, the following tables demonstrates the numbers of officers / staff holding the various categories of vetting; together with numbers awaiting re-vetting and any backlogs.

Position	Headcount	Management Vetting
Police officers	1,182	535
Police staff	876	428
PCSO's	78	0
Special constables	67	0
Non-police personnel	71	0
Awaiting Re-vet (Renewals)	7	3
No of pending applications	55	17

Figure 1.3: Vetting status

5.1. Re-vetting

The force Vetting Unit does not have a backlog, the pending applications have been received in preparation for upcoming Student Police Officer intakes.

5.2. Vetting APP 2024

The revised Vetting APP was developed following significant consultation with the public and stakeholders. It supports forces to identify and respond to risks posed by individuals before they enter policing and during their time in service. It aims to bring greater national consistency to police vetting to ensure the highest standards are maintained.

Parts of the strengthened guidance were developed to address some of the recommendations following the Casey Review, Angiolini Inquiry, and His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) report which found changes were needed in police vetting to better protect the public. Many of the recommendations relate to existing guidance, which was not being followed consistently. The revised APP makes these areas clearer, easier to follow, and more effective.

6. Data Protection

6.1. Freedom of Information (FOI)

At the request of the JASC, the following section provides information on the volume of FOI requests and the departments that are mostly frequently subject to FOI applications; together with the most frequent areas of interest during the last two-years: -

Month	2022/23	2023/24	% Change	2024/25	% Change
Apr	61	104	+41%	101	-3%
May	74	90	+18%	72	-25%
Jun	71	83	+14%	63	-32%
Jul	66	74	+11%	101	+27%
Aug	85	113	+25%	68	-66%
Sep	66	79	+16%	84	+6%
Oct	88	103	+15%	90	-14%
Nov	99	92	-8%	106	+13%
Dec	67	63	-6%	62	-2%
Jan	141	141	0%		
Feb	84	125	+33%		
Mar	127	100	-27%		
Total	1029	1167	+12%	747	

Figure 1.4: FOI applications

Departments

- PSD
- Analysis & Service Improvement
- Road Safety Unit
- Dog Liaison Officers
- Case Coordination Unit
- Learning and Development
- Human Resources
- Finance
- ICT
- Legal / Staff Office
- Business Operations

Themes

- PSD: Police corruption, police disciplinary, police complaints, police disciplinary for sexual allegations, officers with existing convictions.
- Violence Against Woman and Girl's: Both public and police staff.
- Vetting numbers: Numbers failed, business interests, hospitality.
- Human Resources: Demographics of the force in relation to Equality Act factors, establishment numbers, recruited, resigned.
- Dogs: Dog attacks, banned breeds, outcomes.
- Weapons: Knife attacks, outcomes, volumes,
- Crime statistics.
- Mental health and vulnerable adults
- Systems: Companies who are looking for gaps in the market, to tender for work.
- Estate and vehicles: Costs, types, maintenance costs, locations.
- Camera Enforcement / Road safety.
- The Warwickshire Hunt.

FOI applications are heavily driven by common themes in the media, so the volumes of PSD / ACU requests increased just prior to all of the Operation Amethyst work.

6.2. Subject Access Requests (SAR)

Month	2022/23	2023/24	% Change	2024/25	% Change
Apr	23	22	-5%	18	-22%
May	14	19	+26%	19	0%
Jun	28	22	-27%	21	-5%
Jul	30	33	+9%	23	-43%
Aug	25	24	-4%	28	+14%
Sep	20	25	+20%	25	0%
Oct	29	34	+15%	40	+15%
Nov	21	20	-5%	30	+33%
Dec	20	25	+20%	41	+39%
Jan	20	31	+35%		
Feb	18	33	+45%		
Mar	33	24	-38%		
Total	281	312	+10%	245	

Figure 1.5: SAR applications

In terms of the SAR requests, the force do not track what type of data is requested, however anecdotally 60% comprises of a PSD element; either due to the subject having made a complaint and PSD have suggested they make a SAR, or they intend to make a complaint, or they have a live complaint and want the information to complain further.

The force average about 10-15 Employee SAR'S a year, which are often linked to occupational health and ill health retirement, fairness at work grievances / employment tribunal or police dismissal / conduct matters.

5.3. Grievances

There have been 11 Fairness at Works (formal and informal) application submitted this calendar year. This compares to a total of 21 in 2023. The most common themes are welfare, management issues, and workplace adjustments.

Part 2: OPCC

1. Responsibilities

The Policing Protocol Order 2023 sets out the separate responsibilities of the Police and Crime Commissioner and Chief Constable. In respect of police standards, ethics, and complaints, the following sections are pertinent: -

Para. 17: The PCC has the legal power and duty to: -

- b) scrutinise, support, and challenge the overall performance of the force.
- g) maintain an efficient and effective police force for the police area.
- n) monitor all complaints made against officers and staff, whilst having responsibility for complaints against the Chief Constable.

2. Independent Office for Police Conduct (IOPC)

2.1. Liaison

On 9 August 2024, and on 26 November 2024, meetings were held between the IOPC Oversight Liaison Officer and representatives from the OPCC and PSD. The issues discussed were updates from the three organisations and the IOPC performance data for Q1 and Q2 2024/25. A further meeting with the IOPC Liaison Officer is scheduled for 4 March 2025.

2.2. Complaint data: Q2 2024/25

On 3 December 2024, the IOPC published its comprehensive report 'Police complaints information bulletin 'Warwickshire Police – Q2 - 24-25'. The report encompasses data from 1 April 2024 to 30 September 2024: -

[Police complaints information bulletin Warwickshire Police - Q2 - 24-25 | Independent Office for Police Conduct \(IOPC\)](#)

3. Specified Information Order

The Elected Local Policing Bodies (Specified Information) (Amendment) Order 2021 requires the Police and Crime Commissioner to publish a link on their websites to the Independent Office for Police Conduct (IOPC) annual statistics report and publish the most recent quarterly complaints data for their force. The data and reports are to be published within one month of publication by the IOPC and reviewed quarterly.

This information for 2022/23 and Q2 2024/25 has consequently been published on the OPCC website at: -

[Complaints Handling - Office of the Police and Crime Commissioner for Warwickshire](#)

4. Police complaints

The information contained within the IOPC Q2 2024/25 bulletin has been scrutinised. The following key performance indicators, with reference to the relevant sections of the IOPC report, have been identified for Warwickshire Police: -

4.1. Contact (IOPC Section A1.1)

- The average time to log complaints was 1-day; substantially quicker than the Most Similar Forces⁵ (MSF) average of 11-days, and the national average of 6-days. This level of performance is consistent with that of Q1 2024/25.

⁵ Police Forces: Devon and Cornwall, Wiltshire, Gloucestershire, West Mercia, Suffolk, Cambridgeshire, North Wales

4.2. Complaints and allegation (A1.1)

- The force recorded 480 complaints during Q2 2024/25; representing a 19% increase when compared to the 403 complaints recorded during the same period last year (SPLY),
- The force recorded 234 complaints per 1,000 employees: notably more than the MSF average of 181 complaints per 1,000 employees, and the national average of 179 complaints per 1,000 employees. The force's figure for the SPLY was 207 complaints per 1,000 employees.
- Conversely, the force recorded 243 allegations per 1,000 employees: fewer than the MSF average of 266 allegations per 1,000 employees, and the national average of 314 allegations per 1,000 employees. The force's figure for the SPLY was 220 allegations per 1,000 employees.

4.3. Allegation handling and timeliness (A2 + A3.1)

Service recovery

- Of the allegations recorded, 82% were handled as 'service recovery' outside of Schedule 3; substantially higher than the MSF average of 48%, and the national average of 43%.
- The average time to complete allegations handled by this method was 37-days; quicker than MSF average of 47-days, but slower than the national average of 20-days. The force's figure for SPLY was 14-days.
- The allegations were resolved in 93% of the complaints handled by this method, the predominate means of resolution was 'Explanation' at 71%, with 'Apology' at 8%.

Otherwise than by Investigation (OTBI)

- The force handled 6% of allegations as OTBI under Schedule 3; compared to MSF average of 42% and the national average of 46%.
- The average time to complete allegations handled as OTBI was 73-days; compared to the MSF average of 120-days and the national average of 105-days. The force's figure for SPLY was also 73-days.
- The outcome of 'the service provided was acceptable' was determined in 63% of the allegations handled by this method.

- The outcome of ‘the service provided was **not** acceptable’ was determined in 21% of the allegations handled by this method.

Investigations

- The force handled 9% of allegations under Schedule 3 as ‘investigations - not subject to special procedures’; compared to the MSF average of 8% and the national average of 1%.
- The average time to complete allegations handled as ‘investigations - not subject to special procedures’ was 185-days; compared to the MSF average of 267-days, and the national average of 206-days. The force’s figure for SPLY was 133-days.
- The outcome of ‘the service provided was acceptable’ accounted for 70% of the allegations handled by this method.
- The outcome of ‘the service provided was **not** acceptable’ accounted for 20% of the allegations handled by this method.

The percentages for these three methods of complaint handling are broadly consistent with those of 2023/24 and Q1 2024/25.

4.4. Schedule 3 reasons (A1.2)

- Of the complaints recorded under Schedule 3, the Appropriate Authority made the decision to do so in 32% of the cases; compared to the MSF average of 51%, and the national average of 44%.
- Of the complaints recorded under Schedule 3, the reason for doing so in 32% of the cases was due to the complainant’s ‘dissatisfaction after initial handling’ outside of Schedule 3; compared to both the MSF and national average of 15%. The force’s figure for the SPLY was 28%.

It is clear from the data that Warwickshire Police attempt to resolve a higher proportion of complaints as ‘service recovery’ outside of Schedule 3 than both the MSF and national average - other forces more readily adopt OTBI as their preferred method of handling such complaints.

This reliance on the process of ‘service recovery’ seemingly translates into the higher percentage of ‘dissatisfaction after initial handling.’

On 5 February 2025, a meeting is to be held between the PSD Appropriate Authorities (senior decision makers) and the OPCC complaint review officer to discuss common themes in complaint handling and proposals for a process change.

4.5. Allegations (A1.4 + A1.5)

Delivery of duties and services

- The main category of allegations was 'Delivery of duties and services' at 56% of all the allegations made; consistent with the MSF average of 49%, and the national average of 55%. The force's figure for the SPLY was 68%.
- The sub-category of 'General level of service' accounted for 67% of this total; significantly higher than the MSF average of 39%, and national average of 33%. The force's figure for the SPLY was 39%.
- The sub-category of 'Police action following contact' of 13% was significantly lower than the SPLY of 47%.
- The predominate factor for complaint was 'Investigation' representing 40% of all the allegations made. The was followed by 'Roads / traffic' at 13%, and 'Arrest' at 12% of the total.

Individual behaviours

- The second largest category of allegations was 'Individual behaviours' at 16%; marginally higher than the MSF average of 14%, and the national average of 12%. The force's figure for the SPLY was 11%.
- The sub-category of 'Impolite and intolerant actions' at 32% accounted for the largest percentage of this total; significantly higher than the MSF average of 17%, and the national average of 15%. The force's figure for the SPLY was 19%.

Police powers, policies

- The third largest category of allegations was 'Police powers, policies, and procedures' at 15%; significantly lower than the MSF average of 23%, and the national average of 21%. The force's figure for the SPLY was 11%.
- The sub-category of 'Power to arrest and detail' at 26% accounted for the largest percentage of this total; higher than MSF average of 17%, and the national average of 18%. The force's figure for the SPLY was 10%.

- Of note is that the sub-category of 'Detention in police custody' at 5% was once again significantly below the MSF average of 13%, and the national average of 14%.

4.6 Outcomes – Schedule 3 (A3.1)

- For complaints handled OTBI, the service provided by Warwickshire Police was found to be 'not acceptable' in 16% of cases.
- For complaints handled by a local investigation, the service provided by Warwickshire Police was found to be 'not acceptable' in 18% of cases.

4.7. National complaint factors (A1.6)

This section presents information that shows what people are complaining about using a combination of allegation categories and factors against the police force. Categories capture the root of the dissatisfaction expressed in a complaint. Factors capture the situational context of the dissatisfaction expressed in a complaint. The combination of categories and factors provides a richer picture of what people are complaining about compared to the categories alone.

It is clear from the data that 'Investigations' at 42% is by far the predominant reasons for public dissatisfaction, followed by 'Roads/traffic', at 12%, and 'Call handling' at 8%.

5. Complaint reviews

Where a complaint has been recorded under Schedule 3 to the Police Reform Act 2002, the complainant has a right to apply for a review if they are dissatisfied with the way their complaint was handled, or with its outcome. This applies whether the complaint has been subject to a local investigation or handled by OTBI.

The application for a review will be considered by the 'Relevant Review Body' - either the OPCC (Local Policing Body) or the IOPC, depending upon the seriousness and nature of the complaint.

5.1. IOPC data (C1)

- During Q2 2024/2025, the OPCC received 12 applications for a complaint review, marginally fewer than the 13 cases during the SPLY. The IOPC received 3 applications for a review.

- The average time for the OPCC to conclude a complaint review was 26-days; quicker than the MSF average of 35-days, and the national average of 49-days.
- The average time for the IOPC to conclude a complaint review was 138-days.

5.2 OPCC data

The OPCC also maintains its own records for its handling of complaint reviews, this data is more accurate than the IOPC data obtained from the PSD case worker system. At the time of this report, 10 January 2025: -

	Investigation	OTBI	Total
Applications	18	3	21
In Action	2	0	2
Completed	20	4	24*
• Upheld	12	0	12
• Not Upheld	7	4	11
• Other: IOPC	1	0	1
<i>*5 x received in March 2024 and completed in 2024/25</i>			

Figure 2.1: OPCC complaint reviews

- The average time for the OPCC to conclude a complaint review during this period was 19-days.
- Of the 23 reviews conducted by the OPCC, the handling and / or outcome of the complaint was found to have not been 'reasonable and proportionate' in 12 of these cases.
- In all the reviews where it was found that that the handling and / or outcome of the complaint was found to have not been 'reasonable and proportionate,' recommendations were made by the OPCC to Warwickshire Police for either investigation, re-investigation, or remedy.
- Since the beginning of 2022/23 - when recommendations arising from the OPCC complaint reviews were tracked by the OPCC - until the end of Q2 2024/25, recommendations have been made by the OPCC to Warwickshire Police in 40 review cases.
- Of the 81 recommendations arising from these 40 cases, all but 5 recommendations have been accepted by the force. Of note, is that

under the legislation the police service is not under any obligation to accept recommendations arising from an OPCC complaint review.

6. Assurance

6.1. Ethics Committee

On 25 September 2024, a meeting of the Ethics Committee was held at which both the OPCC and PSD were represented. The Chair of the committee is Associate Professor Catherine Hale, who has an extensive background in ethics and law, from Warwick University Medical School.

Two topics of dilemma were discussed: -

1. Police Federation responsibilities during officer representation.
2. Purchase of lottery tickets by police officers and police staff whilst on duty.

The next meeting of the Ethics Committee is scheduled for 22 January 2025.

6.2. Information request

Following the publication of the IOPC Q1 2024/25 complaints bulletin, the OPCC submitted a formal Information Request to Warwickshire Police under the terms of the 'Police Reform and Social Responsibility Act 2011' and the 'Policing Protocol Order 2023'.

A total of nine questions were asked in the Information Request. They principally concerned the increase in the number of police complaints; the number of complaints and allegations per 1,000 employees; the comparatively high rate of handling complaints by 'service recovery'; the comparatively low rate of handling complaints OTBI; the comparatively high rate of allegations of Impolite and intolerant actions.

6.3. Professional Standards Department

On 25 October 2024, an assurance meeting was held by the Police and Crime Commissioner with the Head of PSD, together with representatives from their respective offices. The agenda covered PSD's responsibility for police complaints, anti-corruption, and vetting. A further meeting is scheduled for 28 February 2025.

6.4. JASC complaint dip-sampling

On 17 December 2024, Helen Knee as a member of the JASC conducted dip-sampling of a random sample of recent complaint cases and complaint reviews conducted by PSD and the OPCC. The theme under consideration was complaints arising from police custody detention; thereby complementing the scrutiny work of the OPCC led Custody Detention Independent Scrutiny Pan, of which Helen Knee is the Chair.

Observations arising from this scrutiny and review were then forwarded to PSD, who have provided a response and implemented the learning identified.

7. OPCC Data Protection Act

The following information has been retrieved from the OPCC case management system: -

Year	2020/21	2021/22	2022/23	2023/24	2024/25
FOI	34	33	43	57	20
SAR	6	9	4	10	6

Figure 2.2: OPCC FOI and SAR applications

8. Comments

In conclusion, complaint handling performance is comparatively good and the processes for learning, for both individuals and Warwickshire Police, are well established. Arrangements are in hand for further scrutiny to be applied to areas of concern in the handling of police complaints. There is therefore considerable activity, oversight, and control to provide an acceptable level of assurance.