



**HM CPSI**

HM Crown Prosecution  
Service Inspectorate

# **A follow-up inspection of the recommendations made in the 2023 report: CPS handling of complaints**

**July 2025**

If you ask us, we can provide this report in Braille,  
large print or in languages other than English.

For information or for more copies of this report,  
please contact us on 020 7210 1160,  
or go to our website:  
<https://hmcpsi.justiceinspectors.gov.uk/>

HMCPSI Publication No. CP001-1327

## Who we are

His Majesty's Crown Prosecution Service Inspectorate (HMCPSI) inspects prosecution services, providing evidence to make the prosecution process better and more accountable.

We have a statutory duty to inspect the work of the Crown Prosecution Service and Serious Fraud Office. By special arrangement, we also share our expertise with other prosecution services in the UK and overseas.

We are independent of the organisations we inspect, and our methods of gathering evidence and reporting are open and transparent. We do not judge or enforce; we inform prosecution services' strategies and activities by presenting evidence of good practice and issues to address. Independent inspections like these help to maintain trust in the prosecution process.

## Our vision

We are part of the solution to improving the Criminal Justice System through high quality inspection.

We have four priorities to enable us to deliver this vision:

- We hold the CPS and SFO to account for what they deliver (we make recommendations that drive improvement)
- Victims will be at the heart of inspection (where we can, we will use victim experience in our inspection)
- Using our 25 years of experience we will help public prosecutors improve (their legal casework)
- Inspection will identify and spread best practice

## Our values

We act with **integrity**, creating a culture of **respect**, drive **innovation**, pursue **ambition**, and commit to **inclusivity** in everything we do.

# Contents

<b>Chief Inspector's foreword .....</b>	<b>6</b>
<b>Summary .....</b>	<b>8</b>
Context .....	9
The 2023 inspection.....	9
Methodology .....	10
The 2023 inspection.....	10
This inspection .....	10
Headlines.....	11
Recommendation one .....	11
Recommendation two.....	12
Recommendation three .....	12
Recommendation four .....	12
Recommendation five .....	13
Follow-up .....	14
<b>Progress against the recommendations.....</b>	<b>15</b>
Recommendation one .....	16
CPS Feedback and Complaints Policy .....	16
Our findings.....	17
Recommendation two.....	19
The Contact application (Contact) .....	19
Our findings.....	19
Recommendation three .....	22
Recommendation four .....	23
The 2023 inspection.....	23
Individual aspects relating to letter quality .....	23
Accessibility .....	32
The next stage in the complaints process.....	32
Overall quality of the final letter .....	32
Quality Assurance .....	34
Training on letter quality and quality assurance.....	35
Recommendation five .....	37
The complaints coordinator role.....	37
Role in quality assurance .....	38

<b>Annex A Letter examination questions .....</b>	<b>40</b>
<b>Annex B Overall letter examination data .....</b>	<b>43</b>
<b>Annex C Area performance in overall quality.....</b>	<b>47</b>
<b>Annex D Glossary .....</b>	<b>49</b>

# Chief Inspector's foreword

## Chief Inspector's foreword

Behind every complaint letter is someone who is dissatisfied. Many complainants just want an explanation, hoping that their complaint will lead to an improvement in service. Effective complaint systems should result in improved service and better overall satisfaction levels.

In 2018, and again in 2023, we inspected the standard of complaints handling in the Crown Prosecution Service (CPS). In both inspections, we reported that the quality of letters provided in response to complaints was poor, as just over half of the letters sent by the CPS were of adequate quality. As part of the 2023 inspection and to help drive improvement, we made five recommendations which, if implemented, would have improved the supporting processes and quality of letters sent in response to complaints. It is deeply disappointing that this follow-up inspection has rated only one of the five recommendations as achieved.

There are many pressures on the CPS. The increase in caseloads and delays in the system are all well-rehearsed and add pressure to those working at the frontline. But this cannot be a justification for the poor quality of letters we have seen in this follow-up report. If someone is so dissatisfied with the service they received that they have taken the time to write, then the response they receive should be of a quality that shows their complaint has been considered properly. It is not too much to expect that care and attention has been taken to respond to all the points raised and, where appropriate, remedies and apologies offered. Our findings once again rate just over half (52%) of the response letters sent to complainants as adequate. This is unacceptable. The CPS must improve the quality of the letters they send to those making complaints.

There is still confusion and misunderstanding about who is responsible for the quality assurance of letters. Having made a recommendation in 2023 about the need to clarify the responsibility for quality assurance, it is concerning to find that there is no further clarity or understanding two years on. Given our findings, in this report we make four new recommendations. The CPS must grip this now.

There are not many interactions between the public and the CPS, but dealing with complaints is something that can have a massive impact on the Service's reputation. We will reinspect the quality of complaints response letters in late 2026 and expect to see significant improvement in the quality of letters sent and clarity about how they are quality assured and by whom.



**Anthony Rogers**  
HM Chief Inspector

# 1. Summary



## Context

### The 2023 inspection

- 1.1. HM Crown Prosecution Service Inspectorate (HMCPSI) published a report in August 2023<sup>1</sup> on how the Crown Prosecution Service (CPS) handled complaints. We assessed the quality and timeliness of 351 complaint response letters at stage one and stage two of the complaints process.
- 1.2 The 2023 inspection found that just over half of the letters (51%) were of adequate or better quality. This was disappointing given that the CPS had introduced two levels of quality assurance following our 2018 inspection<sup>2</sup> in which we found the quality of letters sent to complainants was poor.
- 1.3 To address the weaknesses found in 2023, we made five recommendations:
  - Recommendation one: By December 2023 the Crown Prosecution Service will have clarified the time limit for complainants to escalate their complaints to stage two of the process. It will ensure this information is provided consistently in all letters in response to stage one complaints.
  - Recommendation two: By March 2024, the Crown Prosecution Service will develop and deliver training to ensure all staff (it is relevant to) are using Contact consistently and complying with the requirement to fully utilise its functionality.
  - Recommendation three: By September 2023, the Crown Prosecution Service will include timeliness data from the Contact application in the internal CPS databank. This data should feature in Area performance reporting at Area and Divisional accountability meetings.
  - Recommendation four: By December 2024, the Crown Prosecution Service will have improved the quality of complaint response letters, showing a substantial improvement in the number of letters rated as adequate.
  - Recommendation five: By January 2024, the Crown Prosecution Service will clarify what the complaints coordinator role entails and what is expected of them in terms of quality assurance processes for complaint response letters.
- 1.4 At the time of writing, the CPS continues to act on recommendations two, four and five, having closed recommendations one and three.
- 1.5 Given the importance of sending quality complaint response letters to members of the public, many of whom are victims, and in line with our inspection strategy, we decided that it was appropriate at this time to conduct a short follow-up inspection to ascertain to what extent and how successfully the recommendations made in 2023 have been implemented by CPS.

---

<sup>1</sup> [CPS handling of complaints](#); HMCPSI; August 2023

<sup>2</sup> [\[ARCHIVED CONTENT\] Victim Liaison Units: letters sent to the public by the CPS \(Nov 18\)](#)

## Methodology

- 1.6 We examined progress against each of the five recommendations. For each recommendation, we make a judgement as to whether it has been achieved or not achieved using evidence gathered in the inspection from a file examination, documents, data, interviews and focus groups.

### The 2023 inspection

- 1.7 In the 2023 inspection, we examined 351 complaint response letters from the 14 CPS Areas and two casework divisions: the Proceeds of Crime Division (POCD) and the Serious Economic Organised Crime and International Directorate (SEOCID), sent between January and the end of December 2022.
- 1.8 We held focus groups and conducted interviews with relevant staff in both casework divisions and four of the 14 CPS Areas: North East, South West, West Midlands, and Wessex. We also obtained documents from both casework divisions and the four Areas.
- 1.9 We also spoke to managers in the CPS Public Correspondence and Complaints Team (PCCT), who had oversight of the complaints and feedback policy, and Moi Ali, the CPS Independent Assessor of Complaints (IAC).

### This inspection

- 1.10 In this follow-up inspection, we examined 151 letters from the 14 CPS Areas and the same two casework divisions. The letters had been sent in response to complaints as follows:

	Stage one	Stage two
Total letters from each of the 14 CPS Areas	98 (seven from each Area, multiplied by 14 Areas)	42 (three from each Area, multiplied by 14 Areas)
Total letters from CPS casework divisions (POCD and SEOCID)	9	2
Totals	107	44

The letters we examined were sent between March and December 2024, following publication of our report in August 2023. The evidence from our letter examination enabled us to form our judgment as to whether recommendations one and four were achieved.

- 1.11 We conducted focus groups and interviews in four CPS Areas (Mersey-Cheshire, North East, North West and West Midlands) which represented two Areas visited in the original inspection and two Areas which were not. We also examined documents and data received from the PCCT and CPS operational assurance team.
- 1.12 The evidence gathered in the focus groups and interviews, and from our examination of the documents and data supplied enabled us to form our judgment as to whether recommendations two, three, and five were achieved.
- 1.13 The inspection team consisted of five legal inspectors. Leanne Townsend led the inspection, assisted by Siaf Alam, Justine Allan, Jonathan Ellis and James Jenkins. Rachael Pavion, senior legal inspector, supervised the inspection.

## Headlines

- 1.14 Of the five recommendations made in 2023, we have assessed one as achieved and four as not achieved.

### Recommendation one

- 1.15 *By December 2023 the Crown Prosecution Service will have clarified the time limit for complainants to escalate their complaints to stage two of the process. It will ensure this information is provided consistently in all letters in response to stage one complaints.*
- 1.16 We found that there is still confusion internally over the time limit and a lack of consistency in how it is communicated to complainants. The correct time limit is within one calendar month of the date of the reply at stage one.
- 1.17 The CPS has revised its internal guidance. Although we found in our file examination that some Areas stated the correct time limit in most letters, others did not. Errors included incorrectly stating the time limit as 20 working days, stating that the time limit started from the date complainants receive the stage one response (which is not a date the CPS will know), and/or stating that the limit was one month, as opposed to one calendar month.
- 1.18 We therefore assessed this recommendation as **not achieved**. Given the importance of clarity over the time limits, we make a new recommendation:

New recommendation
By August 2025 the Crown Prosecution Service will ensure the correct time limit of 'within one calendar month of the date of this letter' is included in all stage one response letters. By October 2025 the CPS will have carried out internal evaluation to determine if all letters include the correct wording and that there is clear understanding of the time limit.

## Recommendation two

- 1.19 *By March 2024, the Crown Prosecution Service will develop and deliver training to ensure all staff (it is relevant to) are using Contact consistently and complying with the requirement to fully utilise its functionality.*
- 1.20 We found that there has been no formal training delivered in relation to the Contact application (Contact). Contact is not used consistently, nor to its full capacity: draft letters are not routinely uploaded, lessons learnt are not always recorded, and there were errors in recording the category of complaint and whether or not it was upheld.
- 1.21 We therefore assessed this recommendation as **not achieved**.

## Recommendation three

- 1.22 *By September 2023, the Crown Prosecution Service will include timeliness data from the Contact application in the internal CPS databank. This data should feature in Area performance reporting at Area and Divisional accountability meetings.*
- 1.23 We found that timeliness data generated from Contact is included in the quarterly Area Performance Reports (APRs). Data relating to timeliness of acknowledgement and full response is included, along with a stage one and two breakdown and a comparison to the national average.
- 1.24 We therefore assessed this recommendation as **achieved**.

## Recommendation four

- 1.25 *By December 2024, the Crown Prosecution Service will have improved the quality of complaint response letters showing a substantial improvement in the number of letters rated as adequate.*
- 1.26 Of the 151 letters examined, we assessed 79 as adequate or better than adequate, and 72 as inadequate<sup>3</sup>. This equates to 52% of the letters examined being adequate or better, which represents a nominal improvement of 1% on the 51% in our 2023 inspection. We found some improvements with spelling, grammar, use of legal jargon, ensuring letters were addressed properly to the correct recipient, clarity of explanation and offering meetings. However, we also found issues with expressing appropriate empathy, acknowledging mistakes, addressing all the issues raised in the complaint, and offering apologies and/or remedies.

---

<sup>3</sup> 58 letters assessed as adequate, and 21 letters assessed as better than adequate

- 1.27 We therefore assessed this recommendation as **not achieved**. To reflect our findings, we make a new recommendation focused on driving improvement in quality:

New recommendation
By March 2026, the Crown Prosecution Service will have substantially improved the overall quality of complaint response letters. By July 2026 the CPS will have carried out internal evaluation to assess impact and whether improvement has been achieved.

- 1.28 We also found that the quality assurance process is not as robust as it should be at either the legal manager or the complaints coordinator stage, with inadequate quality letters being sent to complainants.

- 1.29 To reflect our findings, we make a new recommendation specifically focused on improving the quality assurance process:

New recommendation
By September 2025, the Crown Prosecution Service will have developed and implemented a robust, consistent quality assurance process to improve the overall quality of complaint response letters. By January 2026 the CPS will have carried out internal evaluations to assess whether quality assurance is effective.

## Recommendation five

- 1.30 *By January 2024, the Crown Prosecution Service will clarify what the complaints coordinator role entails and what is expected of them in terms of quality assurance processes for complaint letters.*
- 1.31 We found that a lack of clarity and understanding remains in relation to the complaints coordinator role generally. Complaints coordinators and those who work with them told us they would welcome guidance and defined expectations for the role: we saw no evidence that this had been implemented since the last inspection.
- 1.32 There is particular confusion in the role of the complaints coordinator in the quality assurance process. We heard that inconsistencies exist between Areas and also the expectations of different teams within Areas.

- 1.33 We therefore assessed this recommendation as **not achieved**. As a result of our findings, we make a new recommendation:

New recommendation
By December 2025, the Crown Prosecution Service will review the quality assurance process and clearly define the roles and responsibilities of all those involved in the complaints process, including that of the complaints coordinators.

## Follow-up

- 1.34 Given our findings and the importance of improving quality, we will carry out further follow-up activity in late 2026.

## **2. Progress against the recommendations**

## Recommendation one

*By December 2023 the Crown Prosecution Service will have clarified the time limit for complainants to escalate their complaints to stage two of the process. It will ensure this information is provided consistently in all letters in response to stage one complaints.*

### CPS Feedback and Complaints Policy

- 2.1. The Crown Prosecution Service's (CPS's) complaints handling procedure is publicised in its external Feedback and Complaints Policy Guidance<sup>4</sup>. There are three formal stages of the CPS complaints procedure.
- 2.2. At **stage one** the complaint will be formally recorded and dealt with in the CPS Area or Division where it originated. The complaint is usually directed to the relevant manager responsible for its subject matter. This will mostly be a first tier legal manager (LM1). This stage involves the first formal review of the complaint.
- 2.3. **Stage two** of the process applies if the complainant remains dissatisfied. They can refer their complaint to a senior manager, typically a Deputy Chief Crown Prosecutor or a second line legal manager (LM2). The complaint should be re-examined at this stage, and the relevant papers considered afresh. This is the final stage for complaints on legal matters.
- 2.4. **Stage three** is only available in relation to service complaints<sup>5</sup>. Complainants who are unhappy with the outcome of the stage two assessment of a service complaint may complain directly to the Independent Assessor of Complaints (IAC). The IAC is responsible for handling and investigating complaints from members of the public in respect of the quality of service provided by the CPS and its adherence to its published complaints procedure. This is the final stage for service complaints.

### Complaints coordinators

- 2.5. Each CPS Area and casework division should have a complaints coordinator. This is an operational delivery role within the CPS Victim Liaison Unit (VLU). Complaints coordinators manage the feedback and complaints process, including using the Contact application and sending out final letters. They also have a role in quality assurance of complaint response letters. In some Areas they are supported by Victim Liaison Officers (VLOs) and they are usually managed by VLU managers.

---

<sup>4</sup> [Feedback and Complaints Guidance: How to give feedback or make a complaint to the Crown Prosecution Service | The Crown Prosecution Service](#)

<sup>5</sup> Legal complaints relate to legal decisions made by the CPS, whilst service complaints relate to the way in which the CPS conducted themselves. Mixed complaints include both legal and service elements.



### Time limits

- 2.6. There are time limits for escalating complaints to the next stage. For stage two and stage three complaints, complainants should request that their complaint be escalated to the next stage within one calendar month of the previous reply being issued by the CPS.
- 2.7. In our 2023 inspection, we identified discrepancies between internal CPS guidance documents in relation to the time limit for escalating stage one responses to stage two of the complaints process. The CPS Feedback and Complaints Area and Central Casework Division Guidance stated that if complainants were dissatisfied with a reply and wished to escalate their complaint to the next stage, they should do so within 20 working days of the reply. This contradicted other, external, CPS guidance advising complainants to request escalation of their complaint within one month of the reply.
- 2.8. The CPS indicated that they wanted to make the complaints process easier and simpler for complainants. In order for that to be done, the discrepancy in the guidance needed to be corrected and a clear, consistent deadline communicated to all complainants at the conclusion of stage one. Recommendation one of our 2023 report sought to address this issue.

### Our findings

- 2.9. The CPS updated its internal guidance in March 2024, which now reads that if a complainant wishes to escalate their complaint to stage two, they *“should do so within one calendar month of the reply being issued.”*
- 2.10. The external policy reads slightly differently and informs complainants that they may refer their complaint to a senior manager *“within one month of the reply.”*
- 2.11. After the guidance was updated, the CPS Compliance and Assurance Team (CAT) conducted dip sampling to assess compliance. Between May 2024 and November 2024, there was an improvement in compliance from 72% of letters correctly stating the time limit to 78%. As a result, the CPS closed recommendation one as performance was ‘much better’ but with ‘room for improvement.’
- 2.12. Our file examination findings show that the time limit was not communicated consistently across or within Areas or Casework Divisions. Our data shows that just over four out of ten letters included a clear and correct time limit, while six out of ten did not.

- 2.13. Some of the letters we examined still referred to the old time limit of ‘20 working days’, some did not mention a time limit and some did not refer to stage two at all. Where a time limit was included, there was confusion around when it would start. Some letters stated that the time limit ran from the date of the stage one reply, while others routinely referred to the date the complainant received the stage one reply as the start date.
- 2.14. Responsibility for the CPS’s handling of complaints sits with the Public Correspondence and Complaints Team (PCCT) within CPS headquarters. The change in internal guidance was communicated by those responsible for that team to complaints coordinators, with the expectation that complaints coordinators would disseminate the message amongst their Area or casework division colleagues.
- 2.15. When we spoke to the CPS’s national leads with responsibility for complaints, we were told that the correct date was the date set out on the stage one response letter and that the calendar month ran from this date. This is because the CPS will not know the date upon which the complainant received the letter and so the relevant time limits could not be accurately calculated.
- 2.16. Some Area staff we spoke to were unaware of the updated guidance and most were unsure of the time limit, instead relying on standard template paragraphs to clarify that information. We heard inconsistencies around who was responsible for inserting those paragraphs into response letters and saw the inconsistencies about the content in our file examination.
- 2.17. Given these findings, we have assessed recommendation one as **not achieved**.
- 2.18. To reflect our findings, we make a new recommendation to ensure clear and consistent communication of time limits to complainants:

New Recommendation
By August 2025 the Crown Prosecution Service will ensure the correct time limit of ‘within one calendar month of the date of this letter’ is included in all stage one response letters. By October 2025 the CPS will have carried out internal evaluation to determine if all letters include the right wording and that there is clear understanding of the time limit.

## Recommendation two

*By March 2024, the Crown Prosecution Service will develop and deliver training to ensure all staff (it is relevant to) are using Contact consistently and complying with the requirement to fully utilise its functionality.*

### The Contact application (Contact)

- 2.19. Contact is the CPS's complaints handling application which was rolled out in 2020. It is a complaints monitoring tool that ensures activities and service level agreements are actioned on time, and it acts as a case management system where complaints material is stored. When a complaint is submitted, whether by post, email, phone call or via the Contact application directly, it should be registered on Contact. All correspondence relating to that complaint should be uploaded to Contact, along with copies of draft responses.
- 2.20. In the 2023 inspection, we saw inconsistent use of Contact by legal managers. We found little evidence of any national training to support the virtual training on Contact. Whilst the CPS Compliance and Assurance Team (CAT) provided evidence that training was delivered to complaint coordinators, we found that many legal managers had minimal experience or awareness of how to use Contact. During interviews conducted as part of the 2023 inspection, the CPS acknowledged that there was 'room for improvement' in the utilisation of Contact.

## Our findings

### Training

- 2.21. Since the last inspection, the CPS's Digital Information Directorate (DID) produced eight PowerPoint presentations which describe how Contact works and how to progress a complaint using it. These are available on the CPS intranet and were circulated to complaints coordinators. The presentations included guidance on how to search on Contact, how to enter feedback, and how to register a new case. They did not distinguish the roles of the complaints coordinators as compared to that of the legal managers. In March 2024, the CPS also delivered four drop-in sessions to allow complaints coordinators to follow-up on the presentations. None of the legal managers we spoke to were aware of these presentations or sessions, though they were not designed with legal managers in mind. Some complaints coordinators were aware of the sessions, but none of those we spoke to attended. The CPS did not keep a record of attendance and so it is not possible to conclude whether these sessions were useful to those involved in complaints handling.
- 2.22. We were told by some complaints coordinators that they rely on Standard Operating Procedure documents for stage one and stage two complaints which are available on the CPS' internal intranet. These were last modified on 8 April 2022 (stage one) and 15 April 2021 (stage two).

- 2.23. We heard that there has been no formal, national training on Contact since the last inspection. Legal managers have had no further training since the initial roll out of Contact. Instead, learning is shared within Areas, typically by complaints coordinators. Most operational delivery staff, particularly those that were newer, believed they would benefit from formal training, even as a refresher, and legal staff said they would need training if they were required to use Contact in future.
- 2.24. In December 2024, a survey was put out to all Contact users by CPS national leads to understand users' knowledge of the application. The results suggested complaints coordinators were comfortable with Contact, but legal managers were less so. The national leads told us that they intend to use the findings of this survey to implement training to address individual learning needs.
- 2.25. We heard from CPS national leads on complaint handling that a lack of resources has been prohibitive in delivering training. CPS national leads recognised that Contact could be better utilised but told us this is also thwarted by a lack of resources. They described Contact as "a missed opportunity."

#### **Contact functionality**

- 2.26. In lieu of a consistent approach to Contact use, local and informal processes have emerged meaning that complaints coordinators are generally the sole users of Contact.
- 2.27. Complaints coordinators recorded the type of complaint. We were told that where they were unsure, they would seek input from a legal manager. Throughout our file examination we saw multiple examples of incorrect categorisation of complaints. There were some, albeit fewer, examples of incorrect recording of whether the complaint was upheld, partially upheld, or not upheld.
- 2.28. The lessons learnt function is not used as required. In some Areas, it was not used at all, in others only once or twice, and in the remainder, typically in less than half of the complaint files we looked at. Lessons learnt have to be provided by the legal managers and input into Contact by complaints coordinators. The complaints coordinators often have to chase the legal managers, and sometimes they receive no response. We heard that Contact requires a 'yes/no' response as to whether there were lessons learnt before a complaint can be closed, but even if 'yes' is selected it does not mandate further content so often no detail on lessons learnt is entered. This reduces the opportunity for wider learning and improvement, which could be improved if the lessons learnt function was fully utilised.
- 2.29. We saw limited resilience in those with the skills and experience to use Contact in Areas and casework divisions. Several Areas have no other operational delivery (OD) staff fully trained in its use besides the complaints coordinator. In two Areas, there was a particularly heavy reliance on the complaints coordinator, although one had recognised this and has already started training additional OD staff.

Another Area had already trained others, having recognised the risk of relying on the complaints coordinator alone.

We saw good practice in one Area where the complaints coordinator would send a detailed allocation email to legal managers. These emails were uploaded to Contact, and they set out the relevant dates, the quality assurance process, and provided templates for lessons learnt for the legal managers to complete. The quality assurance process resulted in improvements in this Area at both stages in half of the letters we assessed.

- 2.30. Whilst some complaints coordinators saw value in the Contact app, they told us some processes were laborious, awkward, and time consuming. One Area circumvented this by uploading complaints documentation directly into the CPS's Case Management System (CMS) and accessing it from there, but the result of this is that full details of any complaints against individuals would be readily accessible to others across the Area. This is not appropriate.
- 2.31. Input from legal managers is managed outside of the app. We heard in interviews that few legal managers use Contact themselves. Our file sample supports this, and we found that legal managers do not frequently upload drafts to Contact and instead leave this to the complaints coordinator or VLU and OD staff.
- 2.32. Legal managers were not confident with using Contact: those who do use it do so infrequently and do not build up familiarity with it as a result. Additionally, high turnover of legal managers means that not all of them have Contact licences as a result, although we were told by CPS national leads on complaints that they conduct quarterly checks to allocate licenses. It is also difficult for complaints coordinators to monitor who can use Contact and their skill levels, and so they find it easier to retain Contact for themselves. Most Contact users we spoke to in the inspection expressed a preference for Contact use to be ringfenced to complaints coordinators.
- 2.33. Contact is neither being used consistently nor to its full capacity, albeit the latter is in part due to resourcing issues in expanding Contact's functionality. Localised training is not effective, and national training was not delivered as recommended. There is also inconsistent resilience across the CPS when it comes to the work done by the complaints coordinators on Contact.
- 2.34. We heard from the CPS that as part of wider work around letter drafting and management, that consideration will also be given on how complaint letters will be managed in the future and via which systems. As a result there is limited value in the CPS investing in training on Contact and so although this recommendation is assessed as **not achieved**, it is no longer appropriate and we therefore do not re-state this recommendation.

## Recommendation three

*By September 2023, the Crown Prosecution Service will include timeliness data from the Contact application in the internal CPS databank. This data should feature in Area performance reporting at Area and Divisional accountability meetings.*

- 2.35. CPS guidance requires complaints received by the Service, by whatever means, to be acknowledged within three working days and a full response provided within 20 working days.
- 2.36. In the 2023 report, we found that whilst over two thirds of letters were sent on time, there were significant geographical variations in performance. This recommendation was made to enable easy access to up-to-date timeliness data and allow the CPS to compare performance for the purposes of good practice, which should result in overall improvements in timeliness.
- 2.37. We found that timeliness data in relation to acknowledgement times and response times is now included in the quarterly APR. The data includes the average times over the quarter, a breakdown in relation to complaints at stages one and two, and a comparison to the national average.
- 2.38. This recommendation is therefore **achieved**.
- 2.39. We found that Areas do not typically generate their own data from Contact. We heard that this data can be difficult to pull from the app and to interpret. Local monitoring practices have evolved instead, typically using Microsoft Excel, which result in an inconsistent local approach. It is the latter data that is provided for and subsequently discussed in local meetings. Given our findings on the consistency and effectiveness of the use of Contact, we would question whether any data generated from the system would accurately reflect performance in any event.
- 2.40. The CPS may wish to consider standardising how Areas collate and discuss timeliness data, given the local practices that have developed in spite of timeliness data from Contact being available in the APRs.

## Recommendation four

*By December 2024, the Crown Prosecution Service will have improved the quality of complaint response letters showing a substantial improvement in the number of letters rated as adequate.*



### The 2023 inspection

- 2.41. In the 2023 inspection, of the 351 letters examined, 179 were assessed as adequate or better than adequate (113 were assessed as adequate with a further 66 assessed as better than adequate). This equated to just over half (51%) of letters being of adequate or better than adequate quality. The remaining 172 (49%) did not meet the required standard.
- 2.42. These findings were disappointing, particularly given that the CPS had two levels of quality assurance for complaint response letters at legal manager level and at complaints coordinator level. Sending letters to members of the public that do not meet quality standards reflects badly on the CPS and can cause complainants to lose confidence in the organisation.
- 2.43. Clearly every letter is important and the CPS will want to strive to ensure that every letter sent out in response to a complaint is of good quality. However, to assess whether recommendation four had been achieved or not, we looked for a substantial improvement of 20% against our 2023 findings in overall letter quality. To enable us to make this comparison we used the same themes, questions and criteria as the 2023 inspection, along with a small number of additional questions where necessary to reflect changes made since the 2023 inspection.

### Individual aspects relating to letter quality

#### Spelling mistakes and grammatical errors


- 2.44. We checked letters for spelling mistakes and grammatical errors that could affect the flow and understanding of the letters. Performance in this area was good, with 146 letters (96.7%) containing no spelling mistakes or minor spelling mistakes that did not affect understanding, and 142 (94%) containing no or minor grammatical errors. This was an improvement from the 2023 inspection on both aspects.

		2023		This inspection		Change	% change	Overall trend
		Volume	%	Volume	%			
Did the final response contain spelling mistakes?	Yes	60	17.1%	5	3.3%	13.8%	-13.8%	
	No	291	82.9%	146	96.7%	13.8%		
Did the final letter contain grammatical errors?	Yes	54	15.4%	9	6.0%	9.4%	-9.4%	
	No	297	84.6%	142	94.0%	9.4%		

- 2.45. We did see some easily avoidable mistakes including ‘where’ instead of ‘were’, ‘trail’ instead of ‘trial’, ‘demeaner’ instead of ‘demeanour’ and Americanised spellings including ‘weaponized.’ These minor errors show a lack of attention to detail, and ought to be picked up in quality assurance, but overall it was heartening to see that most letters no longer contained simple spelling and grammatical errors.

### Legal jargon


- 2.46. We checked whether letters were written in plain English and free from ‘legalese’ and legal jargon. The majority of letters, 125 in total (83%), did not contain unnecessary legal jargon or legalese. This is positive and an improvement from the 2023 inspection.

		2023		This inspection		Change	% change	Overall trend
		Volume	%	Volume	%			
Did the final letter contain unnecessary legal jargon?	Yes	77	21.9%	26	17.2%	4.7%	-4.7%	
	No	274	78.1%	125	82.8%	4.7%		

- 2.47. We saw good examples where the letter writer had clearly put thought into explaining legal terms. In one example, a victim of burglary complained that the charge had been reduced from aggravated burglary to burglary with intent to cause damage. The letter writer clearly explained the difference between the charges and the legal issues with the former. They also clearly explained legal terms, including ‘indictment’: *“As a result, the indictment (the document setting out the charges) needed to be corrected.”* In another Area, the father of a victim in a dangerous dogs case complained about the outcome. The letter writer clearly explained the difference between a destruction order and a contingent destruction order, as well as describing the nature and impact of a Newton hearing. It is helpful for complainants when legal terms are fully explained to them.

### Clarity of explanation, addressing all issues, and confirming whether the complaint was upheld


- 2.48. We assessed clarity in two parts. The first related to whether the explanation was clear: in other words, whether it would make sense to the reader. Our findings were positive, with 124 letters (82%) including a clear and understandable explanation. This was an improvement from the 2023 inspection.

		2023		This inspection		Change	% change	Overall trend
		Volume	%	Volume	%			
Was the explanation clear?	Yes	273	77.8%	124	82.1%	4.3%	+4.3%	
	No	78	22.2%	27	17.9%	4.3%		

- 2.49. The second part of clarity related to whether the response letter clearly communicated the outcome of the complaint. CPS guidance requires all complaint response letters to *“clearly inform the complainant whether the complaint has been upheld, either wholly or in part, or not upheld.”* This is to ensure that the reply is helpful and transparent.



- 2.50. We found that over a third of letters assessed (53 letters: 35.1%) did not clearly inform the complainant whether their complaint was upheld partially or wholly or not upheld. Where we did see a clear outcome, it would typically be in respect of the complaint as a whole (despite there sometimes being different aspects). By contrast, we also saw good practice where the letter writer clearly set out whether *each aspect* of their complaint was upheld.
- 2.51. CPS guidance also makes it clear that “*every issue raised in the complaint must be addressed.*” Where a query cannot be answered, the letter writer should acknowledge that and provide an explanation as to why.
- 2.52. In interviews, legal managers told us that they considered addressing all issues to be a key aspect of complaints handling. Whilst our file examination shows that six out of ten letters (93 letters: 61.6%) did address all issues, this was a decline from our 2023 inspection.

		2023		This inspection		Change	% change	Overall trend
		Volume	%	Volume	%			
Did the letter satisfactorily address all the issues raised in the complaint?	Yes	243	69.2%	93	61.6%	7.6%	-7.6%	
	No	96	27.4%	55	36.4%	9.0%		
	N/K	12	3.4%	3	2.0%	1.4%		

- 2.53. We did see good practice in some Areas which assisted the letter writers to ensure all issues were addressed. In one Area, legal managers were encouraged to summarise the issues as they understood them at the beginning of each letter to ensure they were all addressed. Several Areas also had examples of headlining individual sections, which also allowed them to clearly state which aspects of the complaints were upheld.

### Case Study

A defendant pleaded guilty to several offences including assaults against multiple victims. One victim complained about several issues in the case including a data breach, a failure to update their contact details, failure to rely on some witness evidence, and delays in responding to their initial complaint. The letter writer clearly headlined and addressed each aspect of the complaint and within each section, clearly outlined whether that aspect was upheld or not before offering a detailed explanation:

#### **Lack of response to your initial complaint.**

“...I can confirm that I fully uphold this aspect of your complaint...”

#### **Evidence in the case**

“...I am sorry that I am unable to uphold this aspect of your complaint...”

#### **Correct address not updated**

“...I can confirm that I have partially upheld this aspect of your complaint, for the instances where the CPS...”

***Rushed Victim Personal Statement***

*“...I am unable to uphold this aspect of your complaint as this relates to actions taken by the police.”*

- 2.54. Further improvement is required to ensure all issues raised in complaints are addressed, and to ensure that the CPS complies with its guidance.

**Correctness of information**


		This inspection	
		Volume	%
Was the explanation provided in direct response to the substantive complaint correct?	Yes	115	76.2%
	No	30	19.9%
	N/K	6	4.0%
Was the explanation in respect of any background information or additional context correct?	Yes	109	72.2%
	No	11	7.3%
	N/K	0	0.0%

- 2.55. We assessed accuracy of the explanations provided in two parts. The first assessed information provided in direct response to the complaint (such as case specific information), and the second assessed background information that was provided for additional context (such as an explanation of police charging powers in a case that was later stopped).
- 2.56. This was a different approach to the 2023 inspection, in which we assessed overall accuracy. In the follow-up, we wanted to distinguish between information directly related to the complaint and information that was provided as background only, as we felt this allowed us to properly comment on the accuracy of the letters. As a result, we are not able to make a direct comparison to the 2023 inspection in relation to the accuracy of letters.
- 2.57. More than three quarters (115) of the letters we assessed met the standard in relation to information provided in direct response to the complaint. Nine out of ten letters also included accurate background information, which is a strength.
- 2.58. Performance in this area was generally good. In one Area example, a defendant's ex-partner complained about the defendant being cautioned for offences involving indecent images of children. The letter writer provided accurate, case-specific information, and also some background information around out of court disposals.

- 2.59. We did see examples where easily avoidable mistakes were made, including a letter sent to a police complainant which wrongly advised them that the police were able to charge denied either-way offences<sup>6</sup>. However, examples like this were in the minority.

### Empathy

- 2.60. The CPS's Feedback and Complaints Guidance<sup>7</sup> does not refer to empathy specifically, but empathy is included in its 'Complaints How to Guide', published in January 2021 but amended in August 2023. The latter states that "*Empathy is an essential element within any communication with complainants*" and defines it as "*when you put yourself in the complainant's shoes to see where they are coming from.*"
- 2.61. In the 2023 inspection, empathy was rated as a strength given the improvement in the CPS's performance following the 2018 inspection<sup>8</sup> into VLU's. In 2023, 290 letters (82.6%) were found to express an appropriate level of empathy compared to 53.6% of letters in 2018.
- 2.62. In this follow-up inspection, we assessed whether empathetic language and an appropriate tone was used in the letters using the same assessment criteria as the 2023 inspection. When assessing empathy, we considered the nature of the case and the complaint, the circumstances of the complainant, and the overall context. Although our overall findings show a slight decrease in performance from the 2023 inspection, we still found a high proportion of letters contained appropriate levels of empathy. We rated 123 letters (81.5%) as containing appropriate levels of empathy.

		2023		This inspection		Change	% change	Overall trend
		Volume	%	Volume	%			
Did the final letter contain an appropriate level of empathy?	Yes	290	82.6%	123	81.5%	1.1%	-1.1%	
	No	61	17.4%	28	18.5%	1.1%		

- 2.63. We saw some examples of standard paragraphs or sentences in relation to empathy, which may be appropriate in some cases, although the best examples were bespoke and clearly tailored to the case by the letter writers. We did see some very good examples of empathy, including where it was well expressed even where the complaint, or part of it, was not upheld:

### Case Study

<sup>6</sup> Either-way offences are those that can be dealt with in the magistrates' court or the crown court. In accordance with the sixth edition of the Director [of Public Prosecution's] Guidance on Charging the police are only able to charge either-way offences where they are anticipated as a guilty plea and suitable for sentencing in the magistrates' court (unless the offence also meets certain criteria such as domestic abuse, hate crime, or involving serious injury).

<sup>7</sup> [Feedback & Complaints Guidance](#)

<sup>8</sup> [\[ARCHIVED CONTENT\] Victim Liaison Units: letters sent to the public by the CPS \(Nov 18\)](#)

In one Area, two youth defendants were prosecuted for assaulting another youth. The police cautioned the first defendant and the prosecutor decided to proceed against the second. Following representations from the second defendant's solicitor, a prosecutor reviewed the decision and asked the police to caution the second defendant, which they did. The victim complained via a parent stating that the prosecution should have proceeded.

The CPS did not uphold the complaint and the legal manager responsible for responding to the complaint agreed with the decision made to caution the second defendant. Notwithstanding that, the letter expressed good levels of empathy:


*"I would like to begin by saying how sorry I am that [the victim] was subjected to such a horrible incident. I hope [the victim] is recovering as well as can be expected. I am also sorry that you and your family felt let down by the Criminal Justice System on this occasion..."*

- 2.64. Another good example was a dangerous dogs case in which the letter writer clearly appreciated the impact of the incident on the complainant, which was stated throughout the letter and summarised in the conclusion as follows: *"I fully appreciate why you feel that your family has been failed in this case. I very much regret that our failings have added distress and upset to what was already a very traumatic experience."*
- 2.65. We saw some examples where short, single sentences expressing empathy were sufficient. However, the context of some cases meant that these came across as impersonal, insincere, or too general to be sufficient for the circumstances. Some, albeit few, letters were accompanied by almost accusatory tones, or were dismissive of the complainant's experiences, including one case where the overall tone was poor and another where the letter writer showed no understanding of the complainant's issues or circumstances and only acknowledged being *"disappointed to read of [their] dissatisfaction with the service [they had] received from the CPS"* which is not the same as being empathetic.
- 2.66. There are still improvements to be made as far as expressing empathy is concerned. Standard paragraphs or sentences should not be applied on a 'one size fits all' basis. Complaints are distinct, often involve emotive subjects, and are made by complainants who already feel aggrieved. Complaint response letters should, where possible, be tailored to each complainant to reflect those factors.
- 2.67. The CPS may also wish to consider updating the 'Feedback and Complaints Guidance' document to include the content of the 'Complaints How to Guide.' The guide includes good practice for letter writing, along with examples of good and poor levels of empathy and suggestions of words that might undermine the letter's message and/or read as dismissive to a complainant, which are not included in the overall guidance.

- 2.68. As in the 2023 inspection, we would expect those quality assuring letters to think about how the letter will land and be read by the recipient. Empathy and understanding is something that needs to be felt, and as such any quality assurer should be able to feel how the letter will be received and make sure that it has appropriate empathy.

### Acknowledging mistakes and offering apologies

- 2.69. In its Feedback and Complaints Guidance<sup>9</sup>, the CPS acknowledges that *“it is inevitable that on occasions mistakes may happen; if they do, they should be acknowledged, and an apology given.”* The guidance encourages letter writers to be as open as possible and to refrain from being defensive in their replies.
- 2.70. In the 2023 inspection, we found evidence of good performance with 173 out of 203 relevant letters (85.2%) meeting this standard. We deemed this to be a strength.
- 2.71. We found in this follow-up inspection that performance has declined significantly, with only six out of ten letters meeting the standard.

		2023		This inspection		Change	% change	Overall trend
		Volume	%	Volume	%			
Did the letter acknowledge mistakes and offer an apology where appropriate?	Yes	173	85.2%	58	59.2%	26.0%	-26.0%	
	No	30	14.8%	40	40.8%	26.0%		

- 2.72. We saw examples of complaints being dismissed and/or not taken seriously, examples of ‘victim blaming’, and examples of the CPS being defensive and deflecting blame onto other organisations, including the police. In one example from one of the casework divisions, the letter writer effectively sought to justify a prosecutor’s lack of professionalism in email correspondence as “retaliation” to emails sent to them by the complainant. An example from a CPS Area included the letter writer seeking to blame a supportive victim for the CPS’s acceptance of lesser pleas, though the victim had not been contacted before those pleas were accepted and felt unhappy at the reduction of seriousness in relation to the offence.
- 2.73. We also saw examples in which complaints were accepted in full, with no or insufficient investigation into what happened. This included claims of poor conduct or unprofessionalism where there was no evidence that the subjects of the complaints were given the opportunity to comment. The lack of rigour in investigating such complaints is concerning and is contrary to the CPS’s own guidance on responding to such complaints.
- 2.74. We saw some apologies that appeared to be perfunctory, insincere and which did not adequately make up for the extent of the failings identified. By contrast, we

<sup>9</sup> Feedback & Complaints Guidance

saw some positive examples of good practice where failings were clearly acknowledged, and genuine apologies given:


### Case Study

In one area, a defendant complained about the conduct of the CPS prosecutor at court on the day of trial. The stage one complaint was partially upheld in relation to the prosecutor's conduct, and the complaint was escalated to stage two. The stage two response provided a full acknowledgement that the conduct of the prosecutor fell short of what was required and offered a frank and genuine apology for the impact of the prosecutor's conduct.

- 2.75. The CPS has some work to do in ensuring it takes responsibility for its mistakes. Failing to do so diminishes public confidence and prevents lessons from being learnt. It is important that the CPS thoroughly investigates complaints in compliance with their own standards to ensure that mistakes are identified and acknowledged.

### Remedies

- 2.76. When the CPS' performance has not reached the desired standard, the guidance suggests that *"reasons should be provided and supported, where possible, by steps that have been taken to introduce improvements."* It is important that the CPS seek to rectify their mistakes and put things right with prompt and proportionate remedies. This will usually mean amending practices to ensure that similar mistakes are not made again.
- 2.77. In some cases, as a gesture of goodwill, the CPS may offer a modest financial payment in recognition of an administrative mistake or the provision of poor service, in accordance with the Goodwill Payment Guidance<sup>10</sup>. Goodwill payments are only available for service complaints where the CPS has not acted properly or has provided poor service.
- 2.78. In the 2023 inspection, our findings were generally positive with almost three quarters of letters meeting the required standard. In this follow-up inspection, there was a significant decline in performance with fewer than half of letters meeting the standard.

		2023		This inspection		Change	% change	Overall trend
		Volume	%	Volume	%			
Did the letter offer a prompt and proportionate remedy where appropriate?	Yes	55	72.4%	43	48.9%	23.5%	-23.5%	
	No	21	27.6%	45	51.1%	23.5%		

<sup>10</sup> Crown Prosecution Service Complaints: Goodwill Payments Guidance | The Crown Prosecution Service

- 2.79. We saw too many occasions where the CPS accepted that there had been internal failings but then did not go on to adequately remedy the situation. Often, this meant they failed to evidence feedback to those involved in the errors made or failed to make changes to inadequate processes.
- 2.80. Many of the examples were of the CPS failing to consider a goodwill payment where it was appropriate:


### Case Study

In one Area, a witness in a case involving driving without due care and attention complained after the case was stopped by the court due to the CPS's repeated failure to review it. The witness was involved in the road traffic collision and suffered damage to their vehicle and financial loss as a result. The complaint was upheld at stage two, but there was no apology for the CPS's failings. The circumstances surrounding the complaint clearly fell within the goodwill payments guidance, but no such offer was made.

- 2.81. Whilst financial recompense is limited to particular circumstances, it appears that it is not considered often enough. We note that the guidance on goodwill payments is separate from the general complaints guidance, which may contribute to it being overlooked or missed.
- 2.82. There are improvements to be made in how the CPS remedies mistakes it has made to ensure that public confidence is maintained, and that lessons are learnt.

### Signposting other agencies

- 2.83. Sometimes complaints relate to other agencies in the Criminal Justice System (CJS), or there are issues identified with the provision of service by those agencies. In such circumstances, the CPS should acknowledge the issue, give an explanation as to why it cannot deal with the point, and provide contact details for the relevant agency.
- 2.84. In the 2023 inspection, we found that adequate signposting occurred in 60 of 151 relevant letters (39.7%). In this follow-up, there has been a further decline in performance with less than a quarter of letters meeting the standard.

		2023		This inspection		Change	% change	Overall trend
		Volume	%	Volume	%			
Did the CPS signpost contact information for other agencies where appropriate?	Yes	60	39.7%	17	24.3%	15.4%	-15.4%	
	No	91	60.3%	53	75.7%	15.4%		
	N/K	0	0.0%	0	0.0%	0.0%		



- 2.85. In some letters, the CPS failed to mention other agencies at all when this was necessary. More commonly, they were referred to but no contact details were provided, leaving the complainant with no detailed information on where to go next. We also saw some examples where the complainant explicitly referred to failings by another body, but the CPS either did not acknowledge that, explain why they could not deal with that issue or signpost the complainant to the body that could.

## **Accessibility**

- 2.86. This question was an addition in this follow-up inspection and was designed to capture the CPS's approach to dealing with accessibility needs of complainants. We only found six cases where such considerations were necessary; half of these were adequately addressed, which included liaising with an appropriate adult (with appropriate consents) instead of the victim/witness/defendant directly in one case.

## **The next stage in the complaints process**


- 2.87. We checked whether complainants at stage one and stage two had been given accurate information on how to escalate their complaint to the next stage if they were not satisfied with the response. This question did not include accuracy of the time limits for escalation of stage one complaints to stage two, which was dealt with in a separate question.
- 2.88. We found that in eight out of ten letters, the next stage was explained correctly. This is positive. Examples included a clear explanation that stage two was the end of the process for legal complaints, and that service complaints could be escalated to the IAC.
- 2.89. When letters did not meet the standard, this was often because no distinction was made between service and legal complaints at stage two, meaning the letter was confused about what, if anything, could be escalated. We did however see some good practice where the letter writer would specify which elements of the complaint were service and which were legal, which is helpful to a complainant.

## **Overall quality of the final letter**

- 2.90. When assessing overall quality, we considered the overall ratings in respect of the individual aspects relating to quality to form a judgement.
- 2.91. In the 2023 inspection, of the 351 letters examined, 179 were rated as adequate or better than adequate. Of those, 113 were assessed as adequate and a further 66 as better than adequate. This equated to 51% of letters being adequate or better. However, to assess whether progress had been made against this recommendation so that we could assess it as achieved, we were looking for an improvement in overall quality of a minimum of 20% against our finding on quality of 51% in the 2023 inspection.



- 2.92. Of the 151 letters examined in this inspection, we assessed 79 as adequate or better than adequate (with 58 assessed as adequate and a further 21 as better than adequate), and we assessed 72 as inadequate. This equates to 52% of the letters we assessed being adequate or better, which is only a marginal increase on overall quality compared to our 2023 findings and falls short of the required improvement. Again, we are disappointed in the standard of quality we have found.

		2023		This inspection		Change	% change	Overall trend
		Volume	%	Volume	%			
The final letter was of adequate quality or better?	Yes	179	51.0%	79	52.3%	1.3%	+1.3%	
	No	172	49.0%	72	47.7%	1.3%		

### Comparison of stage one and stage two quality

- 2.93. In the 2023 inspection, we found that stage two letters were generally better quality than stage one, though the difference was not significant. We found that 48% of stage one letters were adequate or better than adequate, compared to 56.2% of stage two letters (a difference of 8.2%).
- 2.94. In this inspection, 47.7% of letters (51) at stage one were of adequate or better quality, compared to 63.6% of letters at stage two (28): a difference of 15.9%.

Better than adequate				
	2023	%	2025	%
Stage 1	36	16%	13	12%
Stage 2	30	23%	8	18%
Adequate				
	2023	%	2025	%
Stage 1	70	32%	38	36%
Stage 2	43	33%	20	46%
Inadequate				
	2023	%	2025	%
Stage 1	115	52%	56	52%
Stage 2	57	44%	16	36%

- 2.95. Whilst the improvement to stage two letters is positive, it is concerning to see that stage one letters have declined in quality since the previous inspection. This also reaffirms our concerns about the robustness of the quality assurance processes, which are discussed further below.
- 2.96. Given our findings and the marginal improvement, we have assessed this recommendation as **not achieved**.

2.97. In light of our findings, we propose to make the following new recommendation:

New Recommendation
By March 2026, the CPS will have substantially improved the overall quality of complaint response letters. By July 2026 will have carried out internal evaluation to assess impact and whether improvement has been achieved.

## Quality Assurance

- 2.98. All complaint response letters are expected to go through a two-stage quality assurance process. The legal manager responding to a complaint should provide a draft response for quality assurance by a legal manager at the next stage of seniority<sup>11</sup>. The complaints coordinator is then responsible for the final quality assurance before the letter is sent to the complainant.
- 2.99. Draft letters should be uploaded to Contact by the letter writers and quality assurers to show the quality assurance audit trail. We found that the CPS are not routinely doing this. We also found that the quality assurance processes were not robust enough at either stage, with inadequate letters being sent where improvements were required and either no evidence of a quality assurance process having taken place or the quality assurance did not add value.
- 2.100. We did see an example of good practice in the quality assurance process in one Area. Draft letters and quality assured letters were uploaded to Contact by VLU staff and it was clear that value was added at both stages, particularly by the senior legal manager who had made several amendments to the initial draft. All changes could be seen in a clear audit trail and the senior legal manager's use of comments and highlighting on the initial draft would undoubtedly have been helpful to the letter writer.
- 2.101. We heard from most legal managers that it was unusual for them to get any feedback directly from complaints coordinators, though that did not accord with the view of some complaints coordinators. However, there were several complaints coordinators who told us that they did not feel sufficiently empowered to challenge a letter that had already been through the legal quality assurance process, particularly when it came to feeding back to senior legal managers. This echoed what we heard in the 2023 inspection.
- 2.102. We heard mixed views on the value of the legal quality assurance process. Some legal managers dealing with stage one complaints received no feedback after they sent the draft response to the senior legal manager, and they would not see their letters again before they were sent out. Others said that sometimes the

---

<sup>11</sup> Stage one complaints are usually dealt with by LM1s and quality assured by LM2s, and stage two complaints are dealt with by LM2s and quality assured by Deputy Chief Crown Prosecutors.

comments were about stylistic points, and that was not always valuable in improving letter quality.

- 2.103. Three of the four Areas we visited hold scrutiny panels which are made up of a variety of staff at different grades, from operational delivery staff to senior managers. The panels review four or five complaint response letters and provide feedback which is passed to the letter writer and/or their manager. One Area required legal managers to attend at least one of these panels annually as part of their development. We also heard that some Areas have senior legal managers conduct dip samples retrospectively on letters that had been sent to complainants. We were told that feedback from these offered more value to legal managers. We consider this to be good practice.
- 2.104. In March 2025, the CPS published an internal ‘Complaints Quality Assurance Standards’ checklist which includes a list of topics that each letter needs to be checked against, in five categories. It also contains examples of ‘what inadequate looks like’ for all five categories:
- Writing standards
  - Understanding
  - Acknowledging failure & seeking remedy
  - Next steps
  - Continuous improvement
- 2.105. Whilst we have not been able to assess the impact of the checklist because it was introduced during our inspection, it is a useful document that should assist those drafting responses to complaints. However, we did not find the checklist to be easily accessible as it is embedded in its internal ‘Contact How to Guide’ page on the intranet and not linked to the Complaints and Feedback Guidance where it may be more usefully placed.
- 2.106. We therefore make a new recommendation to improve quality assurance:

New Recommendation
By September 2025, the CPS will have developed and implemented a robust, consistent quality assurance process to improve the overall quality of complaint response letters. By January 2026 the CPS to have carried out internal evaluation to assess if quality assurance is effective.

## Training on letter quality and quality assurance

- 2.107. Legal staff who are involved in complaints handling told us they had had no bespoke, formal training on responding to complaints. Instead, they would learn from more experienced colleagues. Where training was delivered, it was combined with other victim and witness communications. We also heard that no

formal training had been delivered or received on how to quality assure complaint response letters, whether for legal or OD staff.

- 2.108. One Area received training on victim and witness communications, including complaints, delivered by the CPS' Learning Services (formerly the Central Legal Training Team). Of note, this was the best performing Area in terms of overall letter quality, with seven out of ten letters being rated adequate or better than adequate.
- 2.109. We heard from complaints coordinators that they would welcome training on quality assuring letters. Senior legal managers did not see the value in training for their grade given their experience, but they did see value in training for first tier legal managers in responding to complaints letters.

## Recommendation five

*By January 2024, the Crown Prosecution Service will clarify what the complaints coordinator role entails and what is expected of them in terms of quality assurance processes for complaint letters.*

- 2.110. In the 2023 inspection we found there was a general lack of clarity and understanding of the expectations on complaints coordinators and what their role was when quality assuring letters.

### The complaints coordinator role

- 2.111. Each CPS Area and casework division is expected to have a complaints coordinator. The role sits within the VLU and is typically managed by either the VLU manager or another business manager.
- 2.112. The primary responsibilities of the complaints coordinator include:
- using the Contact application to register and track complaints
  - allocating complaints and monitoring progress and compliance with timescales
  - reporting locally on lessons learnt
  - conducting quality assurance of complaint response letters.
- 2.113. The role is defined in the job description, on the CPS internal careers pathway, and in four objectives which form part of the development programme for role holders.
- 2.114. Complaints coordinators told us that they were generally comfortable with the defined aspects of their role. We saw some good practice in two Areas in relation to allocation of complaints: the complaints coordinators would send a detailed allocation email to the legal managers and upload these emails to Contact. This would set out the relevant dates, the quality assurance process, and provide templates for lessons learnt for the legal managers to complete.
- 2.115. However, in addition to these responsibilities, we heard that most complaints coordinators also take on other duties. Local processes have evolved meaning that there is a greater burden on the role holders than was anticipated, particularly in relation to the use of the Contact application.
- 2.116. For example, some complaints coordinators are expected to triage complaints and categorise them. In our file examination, we saw some examples of complaint categorisation that were incorrect, such as service complaints being recorded as mixed, or mixed complaints being recorded as legal only. We saw examples in which the nature of the complaint was not always immediately clear and which may have benefitted from the input of a legal manager for clarity. The need to correctly categorise a complaint is important as the category of complaint affects escalation options at stage two.

- 2.117. We saw some errors in recording the outcome of complaints, which was also being done by complaints coordinators, albeit usually with support from legal managers.
- 2.118. Lessons learnt were recorded by complaints coordinators, but this was dependent on input from legal managers which we were informed was not always forthcoming. We heard that Contact only requires a 'yes' or 'no' response to complete lessons learnt, with no requirement for further content to be entered. We heard that complaints coordinators often have to chase legal managers for this information, and it is not always received. This means that it is common for complaints to be closed with no detail of lessons learnt being recorded.
- 2.119. We heard that the complaints coordinator role is considered as a specialist role. Some Areas have trained, or are starting to train, VLU staff to cover the role in the event of absence, but we heard that most Areas lack resilience when it comes to duties undertaken by the complaints coordinator.
- 2.120. There is a significant disconnect between the understanding of senior managers and operational staff as to what the complaints coordinator role involves. We heard inconsistent views between and within Areas about what the complaints coordinator does and should do. Legal staff and operational delivery staff often had differing interpretations of the role.

## Role in quality assurance

- 2.121. We heard that there is particular confusion about the role of the complaints coordinator in the quality assurance process. There is little consistency on this between and within Areas. One complaints coordinator we spoke to described their role in the quality assurance process as *"integral"*, though legal managers told us they did not often receive feedback on their letters from the complaints coordinators.
- 2.122. We were unable to find definitive guidance on what each stage of the quality assurance process should involve. The description of the non-legal quality assurance stage on Contact suggests that this part of the process is limited to checking accuracy, the inclusion of escalation paragraphs, reference to support groups, the use of plain English, clarity, tone, and empathy. A similar description is found in the job description and objectives for the complaints coordinator role. The description of legal quality assurance on Contact is limited to: *"Legal Manager quality assurance to be undertaken utilising guidance documents and checklists."*
- 2.123. The checklist referred to above does not distinguish between the two stages of quality assurance or clarify which aspects the complaints coordinator should consider. This may compound the confusion on who is expected to do what in terms of quality assurance. CPS national leads told us that there is nothing on the checklist upon which the complaints coordinators could not have an opinion,

which contradicts the current documentation that does refer to non-legal quality assurance.

- 2.124. Complaints coordinators and those who work with them told us they would welcome guidance and defined expectations for the role, particularly in relation to quality assurance. As this has not been done and the position has in fact been further confused, this recommendation is **not achieved**.
- 2.125. As a result of our findings, it is necessary to make a new recommendation regarding the complaints coordinator role:

New Recommendation
By December 2025, the Crown Prosecution Service will review the quality assurance process and clearly define the roles and responsibilities of all those involved in the complaints process, including that of the complaints coordinators.

# **Annex A**

## **Letter examination questions**



N	Question	Possible answers
1	Who was the complainant?	Victim Witness Defendant Member of judiciary Court staff Police Other Not known
1.1.	If 'Other' on Q1	
2	What was the complaint type?	Legal Service Mixed
3	What was the cause of the complaint?	Outcome at court Decision of prosecutor Poor explanation given by CPS Treatment at court Complaint not relating to CPS Other
3.1	If 'Other' on question 3	
4	Did the manager conducting QA improve the quality of the draft letter?	Yes No Not known Not applicable
4.1	If 'No' on Q4	
5	Did the QA by the complaint coordinator improve the quality of the draft letter?	Yes No Not known Not applicable
5.1	If 'No' on Q5	
6	Did the final response contain spelling mistakes?	Yes No
6.1	If 'Yes' on Q6	
7	Did the final letter contain grammatical errors?	Yes No
8	Did the final letter contain unnecessary legal jargon?	Yes No
9	Did the final letter contain empathy?	Yes No
10	Was the explanation clear?	Yes No
10.1	Did the letter clearly inform the complainant whether the complaint was upheld, either wholly or in part, or not upheld?	Yes No

**A follow-up inspection of the recommendations made in the 2023 report: CPS handling of complaints**

11	Was the explanation provided in direct response to the substantive complaint correct?	Yes No Not known
11.1	Was the explanation in respect of any background information or additional context correct?	Yes No Not known Not applicable
12	Did the letter acknowledge mistakes and offer an apology where appropriate?	Yes No Not applicable
13	Did the letter satisfactorily address all the issues raised in the complaint?	Yes No Not applicable
14	Did the letter offer a prompt and proportionate remedy where appropriate?	Yes No Not applicable
15	Did the letter offer a meeting where appropriate?	Yes No Not applicable
16	Did the letter consider any identified accessibility needs?	Yes No Not applicable
17	Did the CPS signpost contact information for other agencies where appropriate?	Yes No Not known Not applicable
18	Was the next stage correctly explained in the letter?	Yes No Not known Not applicable
18.1	If the letter was a stage 1 letter, did it include a clear and correct time limit for a stage 2 escalation?	Yes No Not known Not applicable
19	Did the letter contain anything that it should not?	Yes – name of suspects not yet charged Yes - name of youth defendants Yes - name of victims in rape cases Yes – names of witnesses Yes – other No
19.1	If ‘Yes - Other’ on Q19	
20	Was the letter addressed correctly?	Yes No
21	The final letter was of adequate quality or better?	Yes No

# **Annex B**

## **Overall letter examination data**

**A follow-up inspection of the recommendations made in the 2023 report: CPS handling of complaints**

Question	Answer	Overall results	Stage one	Stage two
01. Who was the complainant?	Victim	106 (70.2%)	71 (66.4%)	35 (79.5%)
	Witness	12 (7.9%)	10 (9.3%)	2 (4.5%)
	Defendant	22 (14.6%)	17 (15.9%)	5 (11.4%)
	Other	11 (7.3%)	9 (8.4%)	2 (4.5%)
02. What was the complaint type?	Legal	48 (31.8%)	33 (30.8%)	15 (34.1%)
	Service	59 (39.1%)	49 (45.8%)	10 (22.7%)
	Mixed	44 (29.1%)	25 (23.4%)	19 (43.2%)
03. What was the cause of the complaint?	Outcome at court	47 (31.1%)	33 (30.8%)	14 (31.8%)
	Decision of prosecutor	57 (37.7%)	36 (33.6%)	21 (47.7%)
	Poor explanation given by CPS	1 (0.7%)	1 (0.9%)	0 (0.0%)
	Treatment at court	17 (11.3%)	11 (10.3%)	6 (13.6%)
	Other	29 (19.2%)	26 (24.3%)	3 (6.8%)
04. Did the manager conducting QA improve the quality of the draft letter?	Yes	16 (12.0%)	13 (13.4%)	3 (8.3%)
	No	72 (24.1%)	56 (57.7%)	16 (44.4%)
	Not known	45 (33.8%)	28 (28.9%)	17 (47.2%)
05. Did the QA by the complaint coordinator improve the quality of the draft letter?	Yes	26 (19.7%)	24 (24.5%)	2 (5.9%)
	No	80 (60.6%)	58 (59.2%)	22 (64.7%)
	Not known	26 (19.7%)	16 (16.3%)	10 (29.4%)
06. Did the final response contain spelling mistakes?	Yes	5 (3.3%)	3 (2.8%)	2 (4.5%)
	No	146 (96.7%)	104 (97.2%)	42 (95.5%)
07. Did the final letter contain grammatical errors?	Yes	9 (6.0%)	8 (7.5%)	1 (2.3%)
	No	142 (94.0%)	99 (92.5%)	43 (97.7%)
08. Did the final letter contain unnecessary legal jargon?	Yes	26 (17.2%)	17 (15.9%)	9 (20.5%)
	No	125 (82.8%)	90 (84.1%)	35 (79.5%)
09. Did the final letter contain empathy?	Yes	123 (81.5%)	86 (80.4%)	37 (84.1%)
	No	28 (18.5%)	21 (19.6%)	7 (15.9%)
10. Was the explanation clear?	Yes	124 (82.1%)	88 (82.2%)	36 (81.8%)
	No	27 (17.9%)	19 (17.8%)	8 (18.2%)

**A follow-up inspection of the recommendations made in the 2023 report: CPS handling of complaints**

10.1. Did the letter clearly inform the complainant whether the complaint was upheld, either wholly or in part, or not upheld?	Yes	98 (64.9%)	70 (65.4%)	28 (63.6%)
	No	53 (35.1%)	37 (34.6%)	16 (36.4%)
11. Was the explanation provided in direct response to the substantive complaint correct?	Yes	115 (76.2%)	78 (72.9%)	37 (84.1%)
	No	30 (19.9%)	24 (22.4%)	6 (13.6%)
	Not known	6 (4.0%)	5 (4.7%)	1 (2.3%)
11.1. Was the explanation in respect of any background information or additional context correct?	Yes	109 (90.8%)	74 (87.1%)	35 (100.0%)
	No	11 (9.2%)	11 (12.9%)	0 (0.0%)
12. Did the letter acknowledge mistakes and offer an apology where appropriate?	Yes	58 (59.2%)	42 (59.2%)	16 (59.3%)
	No	40 (40.8%)	29 (40.8%)	11 (40.7%)
13. Did the letter satisfactorily address all the issues raised in the complaint?	Yes	93 (61.6%)	61 (57.0%)	32 (72.7%)
	No	55 (36.4%)	43 (40.2%)	12 (27.3%)
	Not known	3 (2.0%)	3 (2.8%)	0 (0.0%)
14. Did the letter offer a prompt and proportionate remedy where appropriate?	Yes	43 (48.9%)	29 (45.3%)	14 (58.3%)
	No	45 (51.1%)	35 (54.7%)	10 (41.7%)
15. Did the letter offer a meeting where appropriate?	Yes	3 (75.0%)	1 (50.0%)	2 (100.0%)
	No	1 (25.0%)	1 (50.0%)	0 (0.0%)
16. Did the letter consider any identified accessibility needs?	Yes	3 (50.0%)	3 (50.0%)	0 (0.0%)
	No	3 (50.0%)	3 (50.0%)	0 (0.0%)
17. Did the CPS signpost contact information for other agencies where appropriate?	Yes	17 (24.3%)	13 (25.0%)	4 (22.2%)
	No	53 (75.7%)	39 (75.0%)	14 (77.8%)
18. Was the next stage correctly explained in the letter?	Yes	120 (80.5%)	98 (91.6%)	22 (52.4%)
	No	29 (19.5%)	9 (8.4%)	20 (47.6%)

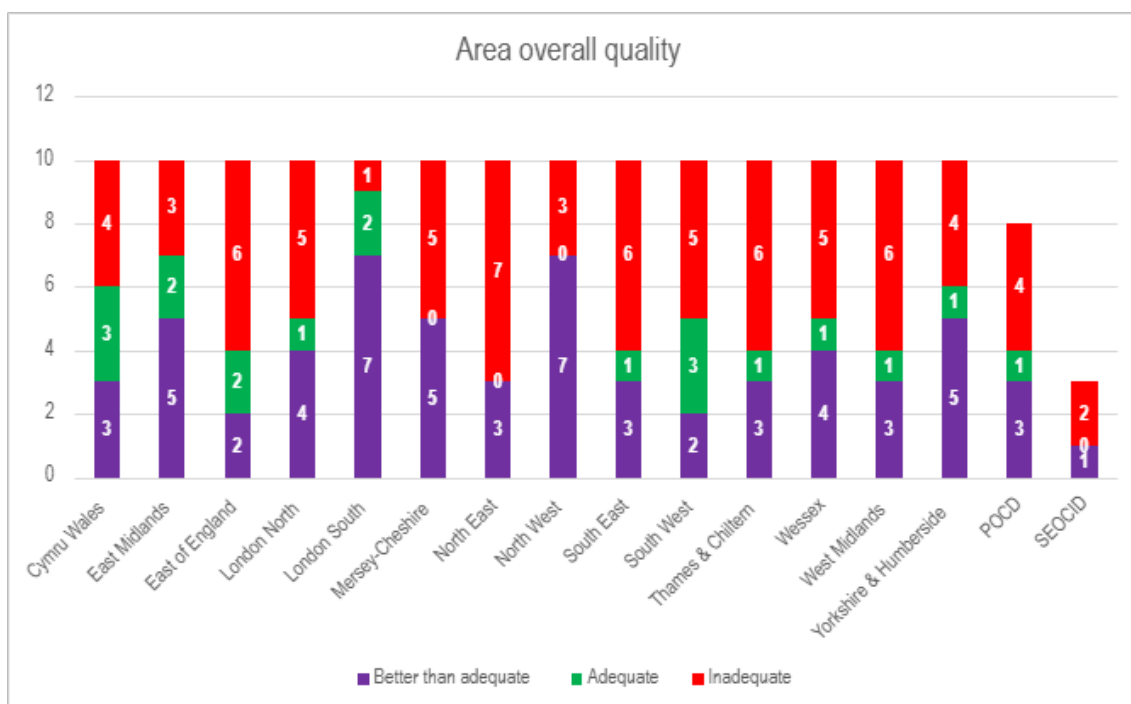
**A follow-up inspection of the recommendations made in the 2023 report: CPS handling of complaints**

18.1. If the letter was a stage 1 letter, did it include a clear and correct time limit for a stage 2 escalation?	Yes	41 (39.4%)	41 (39.8%)	0 (0.0%)
	No	63 (60.6%)	62 (60.2%)	0 (0.0%)
19. Did the letter contain anything that it should not?	Yes - names of witnesses	3 (2.0%)	3 (2.8%)	0 (0.0%)
	Yes - other	1 (0.7%)	0 (0.0%)	1 (2.3%)
	No	147 (97.4%)	104 (97.2%)	43 (97.7%)
20. Was the letter addressed correctly?	Yes	149 (98.7%)	106 (99.1%)	43 (97.7%)
	No	2 (1.3%)	1 (0.9%)	1 (2.3%)
21. The final letter was of adequate quality or better?	Yes	79 (52.3%)	51 (47.7%)	28 (63.6%)
	No	72 (47.7%)	56 (52.3%)	16 (36.4%)

# **Annex C**

## **Area performance in overall quality**

## A follow-up inspection of the recommendations made in the 2023 report: CPS handling of complaints



Area	Better than adequate	Adequate	Inadequate	% adequate or better
London South	7	2	1	90%
East Midlands	5	2	3	70%
North West	7	0	3	70%
Cymru Wales	3	3	4	60%
Yorkshire & Humberside	5	1	4	60%
London North	4	1	5	50%
Mersey-Cheshire	5	0	5	50%
South West	2	3	5	50%
Wessex	4	1	5	50%
POCD <sup>12</sup>	3	1	4	50%
East of England	2	2	6	40%
South East	3	1	6	40%
Thames & Chiltern	3	1	6	40%
West Midlands	3	1	6	40%
SEOCID <sup>13</sup>	1	0	2	33%
North East	3	0	7	30%

<sup>12</sup>Due to lower complaint volumes in POCD we were unable to assess 10 letters overall.

<sup>13</sup>Due to lower complaint volumes in SEOCID we were unable to assess 10 letters overall.



# Annex D

## Glossary

## **Area**

The Crown Prosecution Service (CPS) is divided into 14 geographical Areas across England and Wales. Each Area is led by a Chief Crown Prosecutor, supported by an Area Business Manager.

## **Area Performance Report (APR)**

These are reports collated by CPS headquarters using data from the CPS management information system. It includes data on various aspects of CPS Area performance including complaints, other victim services, and casework measures.

## **Case management system (CMS)**

The IT system used by the CPS for case management.

## **Chief Crown Prosecutor (CCP), Deputy Chief Crown Prosecutor (DCCP), Senior District Crown Prosecutor (SDCP), District Crown Prosecutor (DCP)**

Management roles in the CPS in descending order of seniority. The Chief Crown Prosecutor is the legal head of a CPS Area. DCPs are referred to as LM1s and SDCPs as LM2s.

## **Code for Crown Prosecutors (the Code)**

A public document, issued by the Director of Public Prosecutions, which sets out the general principles CPS lawyers should follow when they make charging decisions. Cases should proceed to charge only if there is sufficient evidence against a defendant to provide a realistic prospect of conviction and it is in the public interest to prosecute.

## **Complaint**

A complaint is defined in the Feedback and Complaints Policy as:

*‘An expression of dissatisfaction about any aspect of our service by a member of the public who has been directly involved in the service complained of’.*

## **Complaints coordinator**

An operational delivery role in the CPS Victim Liaison Unit (VLU). Complaints coordinators manage the feedback and complaints process.

## **Compliance and Assurance Team (CAT)**

The CAT is made up of Legal Assurance and Operational Assurance. Legal Assurance delivers an independent casework dip sampling and analysis function, along with thematic second-line assurance reviews. Operational Assurance leads a programme of independent second-line assurance activity across the CPS. The

team also oversees first-line operational assurance activity in CPS areas and divisions and is the central co-ordinating function for third-line assurance activity, monitoring the delivery of recommendations from HMCPSI and others.

### **Contact application**

A computer software package the CPS uses to manage the progress of complaints through its complaints process.

### **Criminal Justice System (CJS)**

The collective term for public bodies, such as the police, the Crown Prosecution Service, the courts, HM Prison Service, the judiciary, and the Probation Service, that work to uphold the law, take action against people who commit crimes and protect the innocent.

### **Crown Prosecution Service (CPS)**

The principal prosecuting authority in England and Wales, responsible for:

- prosecuting criminal cases investigated by the police and other investigating bodies
- advising the police on cases for possible prosecution
- reviewing cases submitted by the police
- determining any charges in more serious or complex cases.
- preparing cases for court
- and presenting cases at court.

### **Digital Information Directorate (DID)**

The Digital Information Directorate (DID) is made up of five teams: change implementation, finance and commercial, IT operations, strategy, police and control, and technical. Between them the teams focus on transforming CPS technology to ensure the right tools are available, ensure infrastructure is robust and ensure they are creating a shared digital system with partner agencies.

### **Full Code test**

A method by which a prosecutor decides whether to bring a prosecution, based on the Code for Crown Prosecutors. A prosecution must only start or continue when the case has passed both stages of the full Code test: the evidential stage and the public interest stage. The full Code test should be applied when all outstanding reasonable lines of inquiry have been pursued, or, before the investigation is completed if the prosecutor is satisfied that any further evidence or material is unlikely to affect the application of the full Code test.

### **Independent Assessor of Complaints (IAC)**

The Independent Assessor of Complaints is responsible for the handling and investigation of complaints from members of the public in relation to the quality of service provided by the CPS and its adherence to its complaints procedure. The IAC deals with complainants who have exhausted the CPS complaints procedure and who remain dissatisfied with the outcome of their complaint.

### **Operational Delivery (OD)**

There are several OD teams across CPS, all of which work towards ensuring the organisation delivers its functions. Teams include business management, casework, paralegal and business coordination, and executive and business support.

### **Review**

The process whereby a CPS prosecutor determines that a case received from the police meets, or continues to meet, the legal standard for prosecution set out in the Code for Crown Prosecutors. This is one of the most important functions of the CPS.

### **Standard Operating Practice (SOP)**

Instructions on how to complete particular tasks or actions, SOPs cover legal and business aspects of running the CPS. There are a range of SOPs which are standard across the organisation. Their purpose is to apply consistency to business practices and key steps that are needed in all prosecutions. Examples include how to register a new charging request from the police on the case management system, how to record charging advice, how to prepare for the first hearing and how to deal with incoming communications.

### **Victim Liaison Unit (VLU)**

The team of CPS staff in an Area responsible for communicating with victims, the VLU operates under the Victim Communication and Liaison scheme, upholds the Victims' Right to Review, responds to complaints and oversees the service to bereaved families.

## **HM Crown Prosecution Service Inspectorate**

### **London Office**

7th Floor, Tower  
102 Petty France  
London SW1H 9GL  
Tel. 020 7210 1143

### **York Office**

Foss House, Kings Pool  
1–2 Peasholme Green  
York, North Yorkshire, YO1 7PX  
Tel. 01904 54 5490

© Crown copyright 2025

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit [nationalarchives.gov.uk/doc/open-government-licence/](https://nationalarchives.gov.uk/doc/open-government-licence/)

or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk)

This document/publication is also available on our website at <https://hmcpsi.justiceinspectorates.gov.uk/>