



**The Independent Assessor
of Complaints for the
Public Prosecution Service**

Annual Report 2019/20

Delivering an Independent and Confidential Service

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About the Independent Assessor

Sarah Havlin was appointed to the role of Independent Assessor of Complaints for the Public Prosecution Service in June 2019.

Wholly independent from the PPS, Sarah is a solicitor by profession, but she has never been employed by the PPS. As the Independent Assessor she is not under the employment of the PPS and provides an independent service through a procured services contract.

Sarah's role is to investigate and report on complaints once they have been responded to fully under the internal stages of the PPS Complaints Process.

In this report, The Independent Assessor has summarised her activities during the reporting period and set out summaries of all complaints investigated and their outcomes. She has also conducted an evaluation of the Complaint Process and a performance audit of PPS complaint handling.

The formal terms of the role and the remit of the Independent Assessor can be accessed [here](#).



*Sarah Havlin
Independent Assessor*

Chapter 1:

Complaints as an Enabler of Improvement

Observations of the Independent Assessor

In my first year as Independent Assessor, I have found that, overall, the PPS has demonstrated an honest and positive institutional attitude to complaints.

It is of course true to say that many who come into contact with the PPS will be going through the worst experience of their lives and that complaints may often be rooted in the distress caused by the intimidating experience of going through the Criminal Justice system. That said, many complaints received have been very constructive and motivated by people who wish to use their own negative experience in order to improve user experience for others.

In all cases assessed by me this year, I have found that the PPS actively listens to all complaints equally, provides a complaint system that is well structured and enables the voice of the complainant to be heard.

In this reporting period I have seen many instances where complaints have directly resulted in a change to PPS policy and it is my assessment that complaints are taken very seriously at the top of the organisation. This is not done in a 'blame or shame' manner, but in a constructive, reflective and sympathetic way, and in a way which respects the perspectives of both service users and PPS staff.

The Director of Public Prosecutions has demonstrated an openness to direct engagement in cases where complaints have been upheld and the Senior Assistant Director with responsibility for Corporate Services has implemented several changes to policy and process as a direct result of learning from complaints.

I have found that this attitude at the top of the organisation to be highly compatible with the organisation's stated values:

- Independence and Integrity
- Openness and Honesty
- Respect
- Excellence
- Partnership

It has also been reassuring to find during the course of my investigations that PPS staff are open to learning from complaints and to reflecting on situations where things could or should have gone differently.

I have encountered managers, individual prosecutors and the most senior leaders in the PPS who have conceded points quickly, where it was appropriate. I admire the professionalism of staff who can admit when something could have been done better, where an opportunity was missed or a communication was flippant or poorly executed.

It is often the sign of a dysfunctional organisational culture when staff are afraid to admit mistakes. In the course of my investigations, I have never found any staff at PPS who have been reluctant to admit mistakes or to offer an apology when one is due. Considering the combative and adversarial nature of the Criminal Justice system in which they are working, this candour is even more admirable.

My evaluation of the PPS Complaint Process contained in the following chapters of this report is not simply limited to measuring the system according to the efficient processing of the number of complaints received, in a purely quantitative transactional manner. It is more important, in my view, to conduct a quality assessment of:

- How people feel and experience the Complaint process (*this can be difficult to measure as feedback questionnaires have historically shown a very low response rate, but I have received feedback from some individuals at the*

end of the complaint process which is strong anecdotal evidence of user experience).

- Whether the process is principled, consistent and fair (*as benchmarked against the 'Guide to Principles of Good Complaint Handling' by the British and Irish Ombudsman Association*).
- How the PPS responds to upheld complaints in terms of being a reflective organisation, one which can honestly evaluate the feedback from a complaint as a tool for continuous improvement (*as measured against organisational responses to upheld complaints*).

In my view, complaints are an extremely valuable tool in the overall analysis of quality assurance and they can help the PPS gain insight into how successful it has been in terms of 'living its values'. Instead of limiting the use of complaints as a warning to management about how things can go wrong, a strong organisation understands that complaints contain rich intelligence which enable the organisation to 'stress test' the strength of its culture and values and to gain insight into how willing its people are to embrace a culture of candour and accountability.

It is very encouraging for the public to see that the PPS has developed comprehensive **Prosecution Quality Standards** in which it is stated that **complaints enable the PPS to continually strive in providing high standards of service**. The Director states within the Quality Standards:

'Your comments are important as the information you provide helps us to put things right if they have gone wrong and to improve the overall standard of our service over time'

I have compared the user experience within the complaints I have investigated this year and my wider audit of complaints received, in order to demonstrate that the PPS does indeed hold true to these stated standards in the context of listening

to complaints and using the learning that comes from them as an enabler of improvement. This will be demonstrated in the following chapters which will provide a detailed exposition of the PPS complaint system.

Victims of Crime

It is also important to assess the work done by the PPS to improve victim experience, particularly against its commitment to the Victim Charter – a wider policy of the Department of Justice - and the PPS internal policies on victim and witness care.

Many victims of crime look to the PPS as being their personal advocate or having the role of the victim's own legal team. This is not the case, because the PPS is a strictly impartial organisation acting on behalf of society, not just the individual victim. In bare legal terms, the victim is a witness for the prosecution.

Thus a prosecutor is always balancing a range of factors and different interests, which does of course include victim care, but also includes the need to provide a value for money service to the tax payer, a service which is absolutely impartial, one which upholds the operation of the rule of law and which respects the rights of accused persons to defend the charges against them.

These are often very difficult interests to balance at the same time and these complexities in the role of the prosecutor will not be obvious to those coming into the justice system for the first time. The PPS is not a victim's champion, but this can be a common misperception across society, which often leads to a situation where victims feel 'let down' by the prosecution, and this is not always a view that is justified.

I have found that this misperception is a very common theme of complaints against the PPS and often the expectation that some people hold as to what the role of a Public Prosecution Service should be, does not always correspond with

its actual legal role within the system. Many of the victims I have engaged with this year have struggled to understand the difference between prosecution and victim representation.

It is also in this area of victim grievance where I find that people struggle the most with understanding the two distinct pathways of the PPS complaint system. Thus, I want to set out as clearly as possible the two different and separate routes of internal challenge to the PPS which is available to victims, witnesses and indeed to other service users.

Complaint or prosecutorial matter?

There are two distinct routes for bringing a grievance within the PPS internal system and these are:

- By submitting a complaint; and / or
- By raising a prosecutorial matter (for example where a victim requests the review of a prosecutorial decision, as set out in the Code for Prosecutors).

There are important legal reasons for the distinctions between them and they are two very different mechanisms:

A 'Complaint' is limited to issues of quality of service and the operation of PPS systems but it does **not** relate to matters of 'prosecutorial' decision making. A complaint is ultimately escalated to myself as the Independent Assessor of Complaints if it cannot be resolved at the earlier stages of the PPS Complaint Process. It should be noted that a 'prosecutorial' decision is a legal issue that has been decided by the prosecutor according to his or her professional judgement during the course of the prosecution.

Prosecutorial matters may be raised by either victims or persons accused / prosecuted for an offence. These are **not** treated in the same way as a complaint.

A 'request for review' is the PPS internal mechanism which enables a victim (or their representative) to challenge a decision not to prosecute.

Where a review is to be conducted, the approach will depend on whether or not new information has been made available in connection with the request to review the decision.

If no new evidence or information is provided, the case will be considered by a prosecutor other than the individual who took the original decision. Having considered the available evidence and information the reviewing prosecutor will apply the Test for Prosecution and take a new decision, the reasons for which must be recorded in writing. That decision may be to allow the original no prosecution decision to stand or to direct that a prosecution should now be taken. Alternatively the prosecutor may decide that the matter is to be dealt with by way of a diversionary disposal.

Where new evidence or information is provided, the review will be carried out by the prosecutor who took the original decision. The prosecutor will consider all the evidence and information now available and will apply the Test for Prosecution and take a new decision. There are two possible outcomes of such a review:

- It is concluded that the Test for Prosecution is now met and criminal proceedings are commenced (or the matter is dealt with by way of a diversionary disposal); or
- It is concluded that the Test for Prosecution remains not met. In this situation the case will be referred to another prosecutor who will apply the Test for Prosecution and take a new decision.

Full details of the review process can be found [here](#).

It should be noted that this review process does not apply to decisions to prosecute. A defendant who is being prosecuted can ask that the PPS give consideration to stopping a case or dealing with the offence by way of a

diversionary disposal. However, any such request will be considered as part of the duty of the PPS to keep all decisions to prosecute under continuing review.

Prosecutorial matters of this kind, whether being raised by a victim or defendant, are distinct from a complaint investigation. The Independent Assessor is **never** able to investigate complaints about the professional decisions and judgements of prosecutors on legal issues as these are purely prosecutorial issues.

Whilst I do not deal with or report on the prosecutorial process, it is important to highlight that many complaints present a 'blended' complaint. This is when a complaint has been made which crosses both these methods of challenge. So for example, someone might complain after an incident in which they were an injured party because the PPS decided not to prosecute the accused person. In the letter of complaint, the person might say that the decision was wrong because there was evidence that was overlooked and they might also say that the prosecutor was rude, abrupt and patronising to them.

In a blended case like this, the PPS will often refer the whole complaint to a separate senior prosecutor, usually an Assistant Director, who was not involved in the case and who will respond to **both** the prosecutorial challenge (the decision not to prosecute) by way of a Review, and also evaluate the quality of service complaint (the manner and style of prosecutor's communication).

The matter will be responded to in its entirety by the PPS via its internal stages but **only the quality of service complaint can be escalated to the Independent Assessor for Complaints if it remains unresolved.**

The prosecutorial challenge has no further stages of escalation within PPS structures and victims or defendants must take their own legal advice if they wish to bring an external challenge to prosecutorial decision making.

If a blended case like this comes to myself as Independent Assessor of Complaints, I must separate out the prosecutorial matters from the service

related complaints and I will only investigate the service related matters which are within my remit.

This is something that I have found that complainants and also their legal representatives do not understand fully and so I always ensure that this is fully outlined and explained to complainants prior to the commencement of my investigation.

So whilst there are some limits on my remit, what I **can** look at on behalf of complainants are important matters of service experience including matters impacting on personal feelings and issues of human dignity which can include:

- How complainants have been communicated with.
- How they have been treated by the PPS.
- How they have been kept informed of the progress of a case.
- How promptly requests have been dealt with.
- How well decisions have been explained, especially to lay people not familiar with the justice system and those who are vulnerable.
- Whether staff have acted in accordance with PPS stated policy and corporate values including the Code for Prosecutors and the Victim and Witness Policy.

Common Themes

In most of the cases which have been referred to me this year, I have found some excellent practice on the part of PPS staff and I have also identified some areas for improvement.

Any areas highlighted for improvement have been openly welcomed by the senior leadership of the PPS, which is tangible evidence of its desire to listen to complaints as part of its stated goal of continually striving for improvement as a public service.

The most common themes for unresolved distress felt by people such as victims, witnesses and defendants is mainly rooted in difficulties with:

- Delays/Case Handling.
- Communication/Information/Misunderstanding.
- Conduct of the prosecution team.

I have found that it is very rarely the case that complaints are caused by intentional disrespect, under performance or lack of professionalism on the part of PPS staff.

Communication is the central theme to most of the learning that emerged in the complaints investigated this year. The issues raised highlighted areas where standards of PPS practice and interaction with service users can be improved.

Complaints may begin with a negative experience but in most cases within the PPS, they have been positive drivers for awareness raising of the part of PPS staff, particularly in terms of recognising the importance of kindness, empathy and fully embracing the dignity of all people with whom they are engaging and corresponding.

The Carnegie Trust 2018 publication *'Kindness, Emotions and Human Relationships: The Blind Spot in Public Policy'* by Julia Unwin identifies these issues very sharply:

'As our society becomes more transactional and we communicate with our smart phones at least as much as we do with real people, it is tempting to use a technical or technological response. But we are all frail and complex people, and our actions and responses are shaped by our emotions – our history, our expectations, our sense of power – as much as they are by a rational assessment of the issue. And at times of vulnerability and weakness, just the time at which

most of us experience public services, our need for a kind, human and emotionally astute response is the greatest.'

My sense is that the greatest learning for the PPS through its complaint system has been the need for kindness and understanding. Whilst interaction with its users must be professionally capable, it must also be shaped and managed by an understanding of the human condition, by emotional intelligence, by the values of empathy and solidarity and an understanding of full humanity.

This kind of rich organisational learning demonstrates that the value of complaints cannot be underestimated as part of an overall quality assurance audit of an organisation. I therefore wish to thank all the complainants who came forward this year to enable honest reflection on the part of the PPS. I also wish to commend the attitude of the PPS to the complaints made which has been consistently positive and always with a desire to find lessons to be learned in every complaint.

I wish to particularly thank Dr Richard Scullion (Head of Policy and Information) and the Information Management Team within the PPS Policy and Information Unit. Whilst I am independent of the PPS, their support is invaluable to the completion of my investigations and written reports.

Sarah Havlin
Independent Assessor of Complaints

Chapter 2:

Evaluation of How the Complaint Process Works

Background

The PPS has a 3 tier complaints process which is detailed within the complaints policy. PPS staff endeavour to resolve complaints at the earliest possible stage. Complaints are escalated to the Independent Assessor of Complaints, who can review a complaint at the request of a complainant and report their findings to Senior Management. Guidance on the PPS Complaint Policy can be found [here](#).

By the time it comes to my attention, a complaint will have been investigated by two different PPS senior managers at Stage 1 and at Stage 2. The role of the Independent Assessor is to try and resolve cases that get beyond this stage, where, after the PPS has given a properly considered view, differences remain between PPS and the complainant.

Sometimes there are new heads of complaints at this point which are rooted in alleged shortcomings in how the complaint itself was handled. Sometimes the complainant may have an unrealistic expectation or an incomplete understanding of his or her rights and responsibilities and wishes to persist against all the evidence.

Whatever the individual circumstances in each complaint, it is vital that complainants have confidence that issues will be considered impartially and on their merits and that independent judgement will be brought to bear. In this regard the creation of the role of the Independent Assessor by the PPS as a final stage in their complaint process is to be commended. It is by no means a common feature in public sector bodies.

According to the 'Guide to Principles of Good Complaint Handling' by the British and Irish Ombudsman Association, the best complaint schemes are *'firm on principles, flexible on process'*.

This guide is a key measuring matrix when assessing the effective operation of a scheme of complaint handling. The needs of people and resolving differences should be the core focus of building a good scheme, rather than building a scheme which is overly formulaic and a slave to processes.

The success of a scheme is not measured merely on how well it is structured, but primarily on the quality of the underpinning values and principles which enable those managing the scheme to evaluate and solve problems.

Complaint handling takes a common shape in most organisations. Most schemes follow familiar basic stages:

- Receipt of complaint.
- Providing an initial response.
- Trying to resolve a complaint as quickly as possible.
- Carry out an investigation which makes conclusions.
- Feeding the outcome of systemic findings into improving practice.

However, the process of itself cannot deal with complaints efficiently without underpinning key principles to support the scheme and it is these principles and standards which I have used to test the quality of the PPS Scheme.

According to the Ombudsman Association these principles are:

- Clarity of purpose.
- Accessibility.
- Flexibility.
- Openness and Transparency.

- Proportionality.
- Efficiency.
- Quality outcomes.

I will examine each of these principles in turn as they apply to the PPS complaints framework.

Clarity of Purpose

I have benchmarked the PPS Scheme for clarity of purpose against the following criteria:

- Leadership
- Clear Objectives
- Clear Communication
- Clear and consistent processes

Findings:

Leadership

- The PPS complaint scheme is very well led by a team of complaint handlers in the Information Management Team within the Policy and Information Unit.
- There is also very clear leadership and ownership of complaints at the very top of the organisation including the Director, Deputy Director and the two Senior Assistant Directors.
- The Divisional Heads/Assistant Directors of PPS promote the vision and values of the scheme in their approach to written responses at Stage 1 and Stage 2 which I would describe as being detailed, comprehensive and fully explanatory.

- In particular, it is evident that the Director of Public Prosecutions and senior leadership team promote an organisational culture which facilitates a positive and enabling role for managers in the settlement of complaints.

Clear Objectives

- The scheme's principal aim is to secure a fair and proportionate result which brings closure for the complainant and the organisation.
- I find the complaint scheme itself to be a sound and strong self-contained policy and process at PPS, however, there is an added complication with PPS complaints which can sometimes cause public confusion in terms of its purpose.

This is not the fault of the scheme itself but the confusion on the part of service users between the Complaint Scheme and matters that are purely prosecutorial in nature (such as a Review of Prosecutorial Decisions pursuant to the Code for Prosecutors).

This is a more complex situation in complaint handling which is unique to the PPS and there are valid and important legal reasons for the separation of the two schemes. However, this is not always well understood by those outside the PPS.

This is not a criticism of the scheme but an observation to stress to those responding to complainants that it is vitally important to take the time to explain the difference between the two schemes to complainants who are bringing a grievance which straddles the two schemes, or a 'blended' complaint. This happens quite frequently and I have observed that it is a source of confusion for many complainants.

Clear Communication

- I have carried out a random sample audit of Stage 1 and Stage 2 complaint handling and responses demonstrate strong examples of very good communication in written responses.
- It is my assessment that public facing information is readily available on the PPS website where there is a dedicated portal for complaints and it has very clear stated objectives and service standards.
- Public facing information is easy to read and uses plain language and avoids technical jargon which is not always common in legal organisations.
- Engagement with complainants on the part of the complaints staff team is well designed to avoid doubt and misunderstanding about the nature of the complaint.

However, I would repeat my earlier observation about the need for increased communication to give clarity to lay people around the distinctions between a complaint and other prosecutorial matters, especially when dealing with a blended complaint.

I have received several blended complaints and despite the complaint reaching Stage 3, the complainants I met with still did not fully understand the issues that the IAC could assess and those which were excluded because they were prosecutorial matters. I am a lawyer by background myself and it took me a while to fully get to grips with separating the two types of grievance when they are all made together.

The confusion arises because at Stage 1 and Stage 2, the complaint assessor is an experienced prosecutor who can deal with all the issues - both the matters of service standards and a dispute about prosecutorial decisions. A composite response is issued dealing with all of the issues and very often it is not made clear that the assessor is carrying out two separate exercises – a complaint assessment **and** consideration of a prosecutorial issue.

It would be my recommendation that either the two policy documents need to be amended to include cross reference to each scheme to bring clarity to the issue and/or to make the distinction of the two types of complaint clearer in written responses to blended complaints. Correspondence could explain at the outset that there are two schemes applying to the matter and take two separate headings, e.g. 'Review' and 'Service Complaint'.

This would help complainants better understand why some of their grievances are being separated out by the IAC and those matters cannot be considered further.

Clear and Consistent Processes

- The PPS scheme has standard processes for responding to complaint referrals that are strongly complied with.
- Something to consider is the issuing of a simple leaflet or one page diagram as a 'step by step guide' to the service provided and the way the matter will progress e.g. what they can expect in terms of each stage, timelines, the seniority of the staff involved (which is usually very senior officials in the PPS) and the time and attention that will be given.
- Clarity about what can be achieved and what is not possible is vital to helping complainants understand from the earliest stages and I refer to my observations above about those complaints which include issues of prosecutorial decision making.
- If the scheme cannot help someone then information should be given about alternatives. I have seen evidence of PPS staff sign posting complainants to the Police Ombudsman and the Information Commissioner.
- Final letters at Stage 1 and Stage 2 are well drafted and set out a synopsis of the facts taken into account, describe the outcome and the reasons for the decision reached. Directions are always given about next steps.
- Practice is consistently actively reviewed by PPS in light of experience and feedback from complaints via the Management Board.

- The PPS consistently seeks to improve service provision and to learn from complaints and there is tangible evidence of several changes to internal policy and process as a result of learning from complaints.

Accessibility

I have benchmarked the PPS Scheme for Accessibility against the following criteria:

- Awareness
- General Accessibility
- Special Accessibility Needs

Findings:

Awareness

- There is a strong means of promoting the scheme evident on the PPS website.
- I have also found evidence of Corporate Services staff advising members of the public and giving helpful information about the complaint scheme.
- PPS could do more to ensure that it takes all reasonable measures to make the general public aware of its complaint scheme. Promotional material should be available at places where potential complainants are likely to be and where they are able to easily seek the information. This should include all courthouses, through police liaison officers, victim support organisations and so on.

General Accessibility

- It is very easy to access the PPS complaint scheme and contacts come in by email, via the dedicated online portal, by letter and by telephone which have all been processed efficiently.
- Consideration should be given to accessibility via text messaging

Special Accessibility Needs

- The PPS should identify potential barriers for people in bringing a complaint and the practice of the scheme should be aware of special circumstances. For example, sign-posting the use of advocates for vulnerable complainants such as Victim Support NI.
- Practical assistance and guidance is always provided by the dedicated officers within the Information Management team.
- Consideration should be given to issuing a standard help sheet offering specific services should they be required such as language and literacy support, disability considerations and other diversity considerations (religious observances, transgender considerations and so on)
- A true commitment to accessibility is more than just meeting minimum legal requirements. It is about proactively 'opening up' – widening access for all kinds of people who might not otherwise have the knowledge, confidence or ability to complain.

Flexibility

I have benchmarked the PPS Scheme for Flexibility against the following criteria:

- Initial Contact and Expressing the Complaint
- Options for Resolution
- Options for Investigation
- Implementation of Recommendations

Findings:

Initial Contact and Expressing the Complaint

- There is a flexible range of methods of initial contact from a phone call to contact by the complainant's MP.
- It is very straightforward for unrepresented lay people to express their complaint and there is no prescribed format.
- Dedicated staff in the Information Management Team ensure that complainants are supported with information and guidance on first contact.

Options for Resolution

- Informal dialogue and early resolution methods are provided for under the PPS scheme but not often utilised.
- There is a range of options for resolution: apology, explanation, a change of PPS policy, recognition of distress - but not financial redress (see Chapter 4, under 'Should Complainants Have Access to Other Internal Remedies?' for further discussion).

Options for Investigation

- PPS often offers a face to face meeting in complaints.
- Sufficient information is gathered to enable the reaching of clear and reasoned conclusions.
- The scheme is flexible to allow for fast tracking certain cases, for example before a court hearing.
- The scheme allows for complainant driven requests which are accommodated if appropriate.

Implementation of Recommendations

- There is evidence of changes to practice or the introduction of new protocols based on learning from complaints.
- Response from senior management to recommendations is always positive and with 100% acceptance rate.

Openness and Transparency

I have benchmarked the PPS Scheme for Openness and Transparency against the following criteria:

- Governance
- Open Communication
- Stakeholder Relationships

Findings:

Governance

- Internal governance of the complaint scheme is visible and well understood including with up to date policies and procedures which are continually monitored and reviewed.
- The PPS has an Information Management Team who are responsible for collating details of complaints from each region and preparing quarterly reports for the Management Board.
- The Independent Assessor has a clear independent role, there is a published statement of its role and remit together with a clear purpose of the role.

Open Communication

- Subject to the requirements of confidentiality and legal issues, there is a presumption in favour of making information freely available on request.
- For reasons of confidentiality and sensitivity in many cases, it is appropriate that PPS do not publish complaint investigation reports.
- The PPS leadership team receives regular reports on complaints and responds appropriately.
- The organisational culture around the sharing of learning from complaints is one of learning & development and reflective practice and not of 'blame and shame'.

Stakeholder Relationships

- Other agencies within the criminal justice system have complaint systems and it would be beneficial to exchange ideas, complaint themes, learning and best practice with other bodies such as Youth Justice Agency, Courts and Tribunals Service and Probation Service.
- Benchmarking against other DOJ agency complaint schemes was not carried out by me in this reporting period due to the constraints of the Covid 19 pandemic but it is recommended for next year.
- Consideration should be given, in order to secure wider public understanding of the complaint scheme, to increasing relationships with consumer/victim representative bodies and other statutory and voluntary sector organisations involved in criminal justice.

Proportionality

I have benchmarked the PPS Scheme for Proportionality against the following criteria:

Findings:

- Proportionality Of Approach
- Proportionality Of Redress
- Unacceptable behaviour by complainants

Proportionality of Approach

- Only 6 out of 53 complaints received were pursued to Stage 3 at the level of the Independent Assessor, which demonstrates that the earlier stages of the process are effective and proportionate for the purpose of resolving complaints.
- Improvements in attempts to explore very early resolution and dialogue should be considered as only 3 complaints were resolved informally prior to a Stage 1 investigation.

Proportionality of Redress

- Redress should be proportional to the degree and nature of the service failure identified.
- Under the PPS scheme redress is limited to admission and apology with potential for remedial action via implementation of reform and improvement.
- There is no power to award financial payment either by PPS management or the Independent Assessor. This is a matter of judgement for PPS and it is not a criticism of the scheme.

Unacceptable behaviour by complainants

- Accessibility is a key principle but the behaviour of some complainants may require restriction of access. This is particularly true for the PPS where staff can be subject to targeting and abuse.

- 2 cases I investigated demonstrated examples of unacceptable behaviour by complainants.
- A very positive policy development was initiated during the reporting period by PPS to protect staff and to empower and enable staff to deal with unacceptable behaviour.

Efficiency

I have benchmarked the PPS Scheme for Efficiency against the following criteria:

- Effectiveness
- Process Considerations
- Consistency
- Quality Assurance
- Staff Management of the Scheme

Findings:

Effectiveness

- The PPS scheme has a good internal planning process and management processes.
- The process of each stage is clear and published in a public facing document.
- The scheme has adequate resourcing and is very well managed.
- Principles of natural justice and fair procedures are observed.
- Conclusions are always evidence based and decisions and recommendations flow from analysis.

Process Considerations

- Each case is considered on its own merits under the scheme

- Responses are tailored to the issues and adopt an appropriate response.
- The process is capable to reaching resolutions either by dialogue or by formal investigation.
- The process is even handed and contact with complainant and staff complained about is proportionate.
- Time limits and response targets are obvious, communicated and well understood.

Consistency

- Complaint Reviewers are consistently drawn from senior heads of divisions.
- Stage 2 Reviewers are consistently drawn from another separate division to avoid perception of bias.
- Decisions and written responses to complaints should be shared regularly between managers for peer review and learning and development.
- Consideration should be given to quarterly reports of complaint decision letters across division heads to promote consistency of approach and peer to peer learning.
- Template letters are provided to help staff adapt a consistent approach and style.

Quality Assurance

- All complaints were dealt with within a reasonable time frame.
- Information Technology systems are able to produce reports for analysis of performance against stated objectives.
- Surveys of customer satisfaction have been attempted but with very low response rates.
- Benchmarking with other schemes and the standards of good complaint handling is carried out by the Independent Assessor annually.

- Consideration should be given to collating comments, feedback and other anecdotal evidence which tell a story of customer experience in the complaint system.

Staff Management of the Scheme

- The PPS scheme is managed by a dedicated team experienced in complaint handling.
- Staff have been given training and development opportunity in the field of complaint handling.
- Clear guidance has been issued to staff to help them deal with unacceptable behaviour.
- It is recognised that staff who manage the scheme are extremely capable at the job, they are professional and they uphold excellent complaint handling practices.

Quality Outcomes

I have benchmarked the PPS Scheme for Quality Outcomes against the following criteria:

- Complaint resolution leading to positive change
- Quality Outcomes For complainants
- Quality Outcomes For the PPS
- Quality Outcomes For the Scheme
- Quality Outcomes For the Public and Stakeholders

Findings:

Complaint resolution leading to positive change

- Specific examples of positive change are set out in Chapter 4.

- It is my assessment that senior leadership view complaints as an extension to the organisation's quality assurance processes.
- Feedback from complaints is responded to at the highest level of the organisation.

For complainants

- The 2 complaints upheld by me led to letters received from each of the complainants describing a sense of closure.
- Complainants' expectations are managed, including when it is necessary to end abusive and difficult exchanges.
- Gathering of feedback from all complainants has proved difficult.

For the PPS

- Several improvements in processes have been implemented directly as a result of complaint outcomes.
- There is a visible and effective mechanism for passing back lessons from complaints at Management Board level.

For the Scheme

- Lessons are learned by staff from the complaints they handle with a view to improving future complaint handling.
- Priority 3 Recommendations from internal audit on improving achievement of targets on response times is being taken forward by PPS.
- It is recognised that it is not easy to measure all outcomes of the PPS complaint scheme quantifiably but thought could be given to stakeholder outreach if customer satisfaction surveys are not working as a measure. Frequent users or stakeholders of the prosecution service could be used as focus group on understanding more about the frequent themes of complaints e.g. Women's Aid, Victim Support, Court staff, police liaison

officers, Defence solicitors, Judiciary, Youth Justice workers, court translators and so on.

For the Public and Stakeholders

- Consideration should be given to the wider public benefit which comes from such good quality complaint handling by the PPS to highlight the added value that PPS can contribute to the system through its strong scheme and its reflective practice approach. This can include role modelling for other bodies with problematic or less effective complaints systems, developing complaint related training programmes, engagement with training bodies for legal professionals, police and other justice workers on the value of complaints and the benefit of an attitude of candour and openness to learning from your own mistakes and the different perspectives of others.

Chapter 3:

Complaints Investigated by the Independent Assessor

During the reporting period a total of 6 complaints were investigated by the Independent Assessor. The outcomes were as follows:

- Upheld/Partially - 2
- Not Upheld - 4

Case 1 – Not Upheld

A complaint by the family of an acquitted defendant

A complaint was raised by the father of an acquitted defendant because the case took 5 years to come to court and there was a retraction of statement by the alleged victim. The complainant took issue with the decision to prosecute at all, given the retraction of statement. The complainant remained dissatisfied and the matter was investigated by my predecessor, Alan Henry.

Much of this complaint related to prosecutorial decision making and could not be dealt with under the remit of the Independent Assessor. However, my predecessor ensured that he investigated:

- How the matter was communicated and explained to the complainant during the complaint process;
- Compliance with the Code for Prosecutors;
- Undue delay; and
- Alleged failure to support the defendant's mental wellbeing.

None of these complaints were upheld.

Case 2 - Upheld

A complaint by the family of an acquitted defendant

A complaint raised in respect of:

- The conduct of an unidentified Public Prosecution Service staff member outside the workplace; and
- Lack of response and engagement by the Public Prosecution Service in respect of concerns held by the family of an acquitted defendant.

The complaint was partially upheld and recommendations made for improvement were accepted entirely by PPS.

Strong lessons were learned in terms of staff awareness of matter of conduct and ethics under the Code for Prosecutors and for improved communications with complainants.

Case 3 – Not Upheld

A complaint by a victim of crime

A comprehensive series of complaints arose from a minor road traffic collision and alleged assault including:

- Lack of provision of the full picture of evidence by PSNI to PPS in the referral of a file for consideration for prosecution (*not considered – complaint about Police Service of Northern Ireland*);
- Disagreement with the decision taken by PPS that the matter did not reach the threshold for prosecution (*not considered – prosecutorial decision*);
- Concerns that repeated requests for information and disclosure by the complainant were not properly dealt with by PPS (*not upheld – unsubstantiated*);

- Allegation questioning the independence and integrity of the PPS and suggesting collusion between PPS staff and PSNI officers (*not upheld – unsubstantiated*);
- PPS were unreasonably refusing to release information (*not upheld – evidence illustrated full compliance with information release requests on the part of PPS*);
and
- Unfair decision by PPS Corporate Services not to engage in further correspondence with the complainant on the grounds that nothing further of value could be achieved (*not upheld – the decision was reasonable in all the circumstances*).

Case 4 – Upheld

A complaint by a victim of crime

A victim, supported by Victim Support NI, was a witness in a prosecution involving historical offences against children. He was struggling with challenging mental health difficulties as a result of trauma and raised a complaint against the PPS on the basis:

- Of the poor quality and infrequency of information and communication with him; and
- That the Victim and Witness Care Unit had not adhered to the Victim Charter or their own service standards in supporting victims and felt that there was a lack of care and compassion from the PPS.

It was noted and commended that PPS management within its VWCU had already conceded points made in terms of shortcomings in communication with the complainant and had already offered a full apology.

It was my assessment that there were examples of good practice and compliance with the Victim Charter, and there was also evidence of some errors and omissions in this case.

I made observations and recommendations regarding the contact with victims to notify specifically about the plea entered by a defendant, the importance of checking communications with a view to testing clarity and understanding for a wide range of readers and for improving the standard of letters of communication to victims with a focus on empathy, sensitivity and care. This was accepted entirely by the PPS.

Case 5 – Not Upheld

A complaint by a victim of crime

- Delay in the bringing of the case to court (*not upheld, delay was outside control of PPS and fully explained*);
- Poor preparation, low standards of advocacy and poor presentation of the case by the PPS counsel at trial (*not upheld – unsubstantiated*);
- Overlooking the attendance of an essential witnesses at the trial (*not considered – purely a prosecutorial decision taken in the course of a prosecution which is outside my remit*);
- Poor preparation of the complainant as the injured party, particularly in having to deal with the unexpected evidence of the father of the accused at the trial, which the complainant believes was false testimony (*not upheld – alleged lack of explanation/communication with the complainant was unsubstantiated and the credibility of witness testimony is a matter for the court to decide*);
- Failure to bring the case on a more serious charge and in the Crown Court as opposed to Magistrates' Court level given the offending history of the accused (*not considered – purely prosecutorial decision making*);
- There should be a formal review of the case or an appeal or retrial to properly deal with the accused (*not considered – outside my remit*); and

- Failure to provide information and documentation held in the case on request by the complainant (*not upheld – evidence demonstrated full cooperation with requests for information*).

Case 6 – Not Upheld

A complaint by a defendant

The complaint related to the conduct and demeanour of a prosecutor during a 4 minute telephone conversation received by the prosecutor from a self-represented defendant.

The complaint was not upheld as it was unsubstantiated, however, it did raise learning points for the PPS in terms of the appropriateness of a telephone system which permitted direct contact with prosecutors without any call screening in place. Observations were made by me in the interests of both the prevention of misunderstandings on the part of service users and also for protection and security of prosecutors. This was accepted entirely by the senior leadership of PPS.

Chapter 4:

Performance Audit of Complaint Process

A statistical analysis of the complaints received during 2019/20 is presented in detail at **Annex 1**.

Complaint Numbers and Outcomes

The very clear positive statistic for PPS complaints is that during the reporting period **43,332** files were processed by the PPS and a total of **53** complaints were received.

Of those 53 complaints received:

- 3 were resolved by means of early resolution.
- 1 remained outstanding at the end of the reporting period.
- 38 were resolved at Stage 1.
- 11 proceeded to Stage 2.

Of the 11 which were dealt with at Stage 2, a total of 6 were escalated to the Independent Assessor.

Some positive findings can be drawn from these statistics:

- Just over 0.1% of the total files processed by PPS gave rise to a complaint.
- The majority of complaints received were satisfactorily dealt with at Stage 1.
- 40% of complaints at Early Resolution/Stage 1 were upheld/partially upheld.
- Out of 28 complaints not upheld at Stage 1 only 11 proceeded to Stage 2.
- Of the 11 complaints which were not satisfied at Stage 2, only 6 complainants pursued the matter to the Independent Assessor.

- Out of the 6 continuing complaints, a large majority were not upheld by the Independent Assessor and only a total of 2 of the all of those complaints received by the Independent Assessor were partially upheld/upheld.

In respect of this evidence it is reasonable to conclude that:

- PPS has an extremely low level of complaints.
- 40% of complaints were conceded at the earliest possible stage.
- The internal process is very effective at resolving the majority of complaints, particularly at the early stage.
- Of the 20% of complaints which proceed to Second stage, over 50% of those Stage 2 complaints were reported to the Independent Assessor.
- Only one third of complaints which reached the Independent Assessor resulted in a different finding from Stage 2, therefore the outcomes in the majority of cases dealt with at Stage 2 were fortified by the investigation of the Independent Assessor.

My observation of this evidence is that the PPS carries out its extensive work with an extremely low level of complaints received, and, when it does receive complaints, they are dealt with openly and honestly with concessions made as early as possible. A small number remain unresolved by the end of Stage 2 and only a very small number result in a different finding on investigation and assessment by the Independent Assessor.

Benefits of Early Concessions and/or Dialogue

I would observe that the most positive statistic in terms of complaint outcomes is contained within the year on year comparison figures over the 5 years since 2015. This reporting period shows the lowest number of total complaints received over the 5 year period, and it also shows that, proportionately, this year had the highest number of complaints which were upheld/partially upheld.

In 2018/19 15% of complaints were upheld or partially upheld compared to 40% in 2019/20. Indeed, this year's figure is markedly higher across the statistics over the last five years.

The reason why I think this is an encouraging statistic is because the amount of people who feel the need to complain has gone down but the attitude of candour on the part of PPS in early recognition of where things could have been done better or done differently has improved. This suggests a reassuring level of ability to concede and compromise with complainants on the part of the PPS.

If I were to have one constructive criticism for the PPS to improve upon it would be that only 3 complaints were resolved by early stage resolution prior to the formality of a Stage 1 investigation.

This may be something that is outside the control of the PPS, because not all complainants wish to participate in informal dialogue and many prefer to go straight to a formal mechanism. However, in one of the complaints investigated by me this year I found that it was a very suitable case for early engagement and that an opportunity had been missed to de-escalate the problem.

In that case I made a recommendation to the Director of Public Prosecutions that a more proactive strategy should be adopted in order to find ways of informal resolution at the earliest stages of a complaint, which can often reduce the number of complaints escalating and provide better overall rates of satisfaction in complaint handling. This was fully accepted.

Complaint Themes

In descending order, the most common themes of the complaints received were:

- Case Handling/Delay.
- Communication/Information.
- Primarily Prosecutorial.

- Conduct.
- 'Other'.
- Court Performance.

These themes are broadly consistent with the most common themes in the previous year.

It is worth noting that there is a decrease since last year in terms of conduct related complaints and in court performance complaints whereas there is an increase in case handling related complaints.

Complaints by Business Area

Belfast Region is where the highest number of complaints originate and given the amount of business conducted in the Belfast Region this is not surprising.

Complaints appear to be originating evenly and proportionately across business areas. There would not seem to be any business area standing out as an area with an unusually high portion of the received complaints.

Timeliness

The target for **Acknowledgement** of Complaints is 5 working days. Achievement of this target is strong to very strong across all business areas.

The target of **Complaint Response** is 20 working days. The analysis of this target highlights an area of concern in both the Private Office / Central and the Serious Crime Unit. Whilst Belfast and Western and Southern are managing 100% achievement of this target and Corporate Services are achieving 86%, the Serious Crime Unit is only managing 57% and the Private Office / Central is achieving only 50%.

Complaint investigation can be significantly time consuming. The business areas which find the 20 day response target challenging is possibly due to lower staffing levels in those business areas. I would recommend further consideration of this target and the problems it may be posing for these two business areas.

Who Is Complaining?

- The most common category of complainant were victims of crime, their relatives and their legal representatives, which accounts for 64% of complaints.
- This is followed by defendants in prosecutions, their relatives and legal representatives at 21% of complaints.
- 8% of complaints were brought by witnesses other than victims

Of the remaining 7%:

- A single complaint was brought by the Police Service of Northern Ireland and a further single complaint by another government department.
- 2 complaints were classed as 'other'.

This would seem to be a proportionate representation of service users of the PPS. The higher numbers of victims as complainants is not surprising given the traumatic circumstances of criminal proceedings for victims of crime.

Perspectives of Complainants

Of the two complaints which were upheld by the Independent Assessor, I gained the following feedback by email directly from the two complainants involved in each case:

***“Thank you for the time spent dealing with our complaint. It has given us a sense of closure and we will take the time to decide on how to proceed, if at all.*”**

In dealing with you, we felt that we were being listened to and that our concerns were for the first time being addressed”.

“I thank you very much for your time and careful consideration into my case and your call to me and listening to my concerns. I really do appreciate your work on this matter”

And further feedback was received by email from a caseworker at Victim Support NI:

“Spoke with [complainant] today and he wanted me to pass on his thanks for all you have done addressing the issues he raised in his complaint. He feels that he has been listened to and more importantly for victims; believed.”

The PPS can take assurance from this feedback because although it is directed at the Independent Assessor process, this is still a part of the PPS internal mechanism for listening to and learning from complaints.

The two cases which were upheld by me after investigation were extremely sensitive cases. Accordingly, I believe that the third stage of the PPS process worked very well in those cases because it demonstrated that the PPS actively and openly invites external scrutiny and impartial judgement from an independent person.

In both these cases, this independent scrutiny resulted in an acceptance of how things could have been done differently by the PPS, greater understanding on the part of complainants in terms of the perspective of the PPS and it has given a sense of closure to people involved in particularly difficult cases.

What Is Their Remedy?

As stated in my opening observations, there is reassurance for service users of the PPS in terms of its standards, evidenced by the PPS policy around Victim and Witness Care, its adherence to the Victim Charter as well as its comprehensive policy documents – the Prosecution Quality Standards and the Code for Prosecutors.

It is also reassuring to find that a significant number of complaints brought by victims have been upheld or partially upheld and action has been taken to offer an apology, confirm that staff training will be improved or policy and procedures will be changed and developed.

Complainants therefore can achieve:

- Closure from having a complaint recognised and upheld.
- Restoration through an unequivocal apology being offered.
- Satisfaction that the complaint has changed attitudes, raised awareness improved practice and/or changed PPS policy.

I have been impressed by actions taken at the most senior level of the PPS in response to remedying the complaints which were upheld by me this year.

Specific Examples of excellent practice:

- Full acceptance by PPS senior leadership of all recommendations made by the Independent Assessor.
- Unequivocal apologies offered in all cases upheld.
- A personal letter from the Director of Public Prosecutions to a complainant.
- Direct action by the Director of Corporate Services to raise awareness of staff and update PPS policy and practice.

Some tangible evidence of such practice:

Extract from Letter to Independent Assessor from Senior Assistant Director (Resources and Change) March 2020:

I accept the...recommendation and have asked...the Head of the VWCU to conduct a review of the arraignment stage of the Unit's procedures, as well as any relevant template correspondence, to ensure that we are in full compliance with our Victim Charter commitments. In undertaking this review, he will be mindful of the circumstances of this case, paying particular attention to contact procedures where a case is sensitive in nature and where the victim may have a vulnerability.

Extract from Letter to Complainant from Director of Public Prosecutions, November 2019

May I thank you for the time taken to raise important issues...The Criminal Justice system is adversarial in nature which often presents a difficult environment for complainants, witnesses and indeed defendants. This also extends to families of those involved in court proceedings and I believe that it is invaluable that experiences are fed back so that criminal justice agencies can address avoidable shortcomings and continue to improve....I intend to adopt all recommendations in the IAC Report and am taking these matters forward for future complaints. This should lead to enhanced confidence in the effectiveness of our processes, provide better quality complaint handling and also maximise the value that meaningful and transparent engagement with complainants can have'.

Should complainants have other internal remedies?

In some complaint policies there is provision for a remedy of financial redress. The complaint policy of the Crown Prosecution Service in England and Wales provides for the consideration of such a remedy in certain cases which has been commented upon in previous reports by my predecessor.

In the Crown Prosecution Service, the Independent Assessor and indeed CPS lawyers may decide to make consolatory payments to individuals *'where there is clear evidence of uninsured material loss or severe distress caused by maladministration or poor service by the CPS'*.

I noted one case in my audit of internal complaints in the PPS which was brought by a victim because a prosecution for assault became statute barred due to a significant error on the part of a PPS employee. This error was openly admitted by the PPS at Stage 1 of the process and the complainant was told that due to the error of the PPS the accused could not be prosecuted as it was out of time. It was openly and candidly recognised by the PPS that this should not have happened and that it was a serious error. A fulsome apology was tendered and an assurance in terms of staff training was also given. The complaint ended at Stage 1. This was no doubt an extremely distressing outcome for the injured party.

In this case I observed that were this complaint raised in a similar case in England, the victim would possibly be considered to receive a recognition payment of compensation under the CPS complaint system for the significant distress caused by the error.

In this jurisdiction, the only further route of remedy for a complainant in this situation would be via an external challenge by taking legal advice and pursuing a case in the civil court system. This route is not always known or accessible to many people and it can be costly.

This internal compensation mechanism may not be suitable for the PPS, which is operating in a small jurisdiction like Northern Ireland, whereas in the CPS the volume of complaints is significantly larger. The small number of complaints received by the PPS may not justify the resource required to establish and operate this type of financial payment system and such matters are for high level policy consideration. However, in all fairness to the victim in this one complaint, it is my assessment that it would have been duly fair and equitable if had been open

to the PPS to consider this kind of consolatory payment in this rare case of an admittedly serious error which prevented a prosecution.

Chapter 5: Concluding Observations

My overall opinion of the PPS Complaint Process, having thoroughly reviewed its performance this year, is that it has consistently performed to a very high standard.

This opinion can be fortified by reference to the internal audit report of 12 March 2020: *'Internal Audit Review of Public Prosecution Service Complaints Handling'*. An overall satisfactory opinion was given in respect of the audit.

There are some areas where practice and standards can be raised even higher as highlighted throughout this report.

These are suggestions only in terms of ways to raise standards even higher and they are not formal recommendations.

The appetite for making improvements will of course have to be balanced with other considerations such as budget, staffing and working priorities.

The PPS like many front line organisations has been extremely challenged by the onset of the Covid 19 Pandemic in March 2020 and I commend the Director and his staff for their ongoing commitment to working on the front line and ensuring that such an important service continues to deliver during these extremely pressurised times.

Indeed, the ongoing challenges of the pandemic is the reason for the considerable delay in the production of this report for which I must apologise.

I wish the PPS well going forward into the future and hope the people within in it continue to strive for excellence in service standards.

Sarah Havlin
February 2021

Annex 1:

Complaints Handling in the PPS 2019/20

Table 1: Numbers of complaints

Year	Complaints Logged
2015/16	67
2016/17	66
2017/18	90
2018/19	59
2019/20	53

Table 2: Outcome of complaints

Year	Upheld	Partially Upheld	Not Upheld	Resolved Informally	No further action required	Outstanding	Total
2015/16	6	6	38	7	10	-	67
2016/17	3	14	33	4	11	1	66
2017/18	7	11	60	7	3	1	90
2018/19	2	7	44	3	2	1	59
2019/20	7	14	28	3	0	1	53

Table 3: Complaints Substantiated (Partially or wholly upheld)

Year	Number of Complaints	% Substantiated
2015/16	67	18
2016/17	66	26
2017/18	90	20
2018/19	58	15
2019/20	53	40

Table 4: Reasons for complaints

	2018/19	2019/20
Case Handling/Delay	18	24
Primarily prosecutorial	13	13
Communication / Information	13	15
Conduct of staff / Counsel	16	11
Court Performance	14	5
Other	6	11
Total	80	79

Table 5: Complaints by Regional Area

	Belfast	Western	Southern	SCU	Private Office Central, HCI & F&D	Corporate Services	Total
2019/20	18/53 (34%)	13/53 (24%)	4/53 (7%)	7/53 (13%)	4/53 (7%)	7/53 (13%)	53/53

Table 6: Complaints Substantiated (Partially or wholly upheld)

	Belfast	Western	Southern	SCU	Private Office Central, HCI & F&D	Corporate Services	Total
2019/20	6/18 (33%)	7/13 (54%)	3/4 (75%)	2/7 (28%)	0/4 (0%)	3/7 (43%)	21/53 (40%)

Table 7: Numbers of complaints acknowledged within 5 days

	Belfast	Western	Southern	SCU	Private Office Central, HCI & F&D	Corporate Services	Total
2019/20	18/18 (100%)	12/13 (92%)	4/4 (100%)	7/7 (100%)	4/4 (100%)	7/7 (100%)	52/53 (98%)

Table 8: Numbers of complaints dealt within 20 days

	Belfast	Western	Southern	SCU	Private Office Central, HCI & F&D	Corporate Services	Total
2019/20	18/18 (100%)	13/13 (100%)	4/4 (100%)	4/7 (57%)	2/4 (50%)	6/7 (86%)	47/53 (88%)

Table 9: Types of Complainant

Complainants	Number
Victims	23
Victims' Relatives	9
Victims Legal Rep	2
Defendants	9
Defendants Relatives	1
Defendants Legal Rep	1
Witnesses	4
PSNI	1
Departmental	1
Other	2

Table 10: Complainants by type

Complainants	Belfast	Western	Southern	SCU	Private Office, Central, HCI & F&D	Corporate Services	Total
Victims	6	6	2	2	1	6	23
Victims' Relatives	4	2		2	1		9
Victims Legal Rep	1	1					2
Defendants	5	3		1			9
Defendants Relatives				1			1
Defendants Legal Rep			1				1
Witnesses	2			1	1		4
PSNI			1				1
Departmental					1		1
Other		1				1	2

Table 11: Basis of Complaint by Region

Complaint	Belfast	Western	Southern	SCU	Private Office, Central, HCI & F&D	Corporate Services	Total
Communication/Information	5	3	1			6	15
Staff/Counsel	4	4			2	1	11
Court Performance	1	3	1				5
Delay/ Handling	7	9	1	5	1	1	24
Prosecutorial	8	2		1	2		13
Other	2	1	1	3		4	11

Table 12: Basis of Complaint by Complainant

Complainants	Victims	Victim's relatives/ reps	Witnesses	Defendants	Defendants relatives/ reps	PSNI Departmental	Other	Number
Communication/ Information	10	3	1			1		15
Staff/Counsel	5	1		2		2	1	11
Court Performance	2	2					1	5
Delay/ Handling	12	8	1	3				24
Prosecutorial	7	1	2	3				13
Other	4	1	2	1	2		1	11

Table 13: Outcomes by Complainant

Complainants	Victims	Victim's relatives/ reps	Witnesses	Defendants	Defendants relatives/ reps	PSNI Departmental	Other	Number
Upheld	5	1			1			7
Partially Upheld	7	4	2			1		14
Dismissed	10	3	2	9	1	1	2	28
Resolved Informally	1	2						3
No Further Action								-
Outstanding		1						1

Table 14: Means of Complaint

	Belfast	Western	Southern	SCU	Private Office, Central, HCI & F&D	Corporate Services	Total
Email	14	8	3	3	2	5	35
Portal	2			3			5
Letter	2	5	1	1	2	2	13



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