



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

# **Annual Report**

**2014/2015**

*Mr Alan Henry OBE*

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## Chapter 1: Background

*I was appointed to the post of Independent Assessor of Complaints (IAC) for the Public Prosecution Service (PPS) in May 2013. The role (see Chapter 6) entails investigating and reporting on complaints which are referred to me after they have been responded to fully within the PPS Complaints Procedures, and which are primarily non-prosecutorial in nature. I also carry out an audit function of all complaints to the PPS, and carry out benchmarking to ensure that the PPS complaints procedures are compatible with best practice throughout the public and private sectors.*

This is the 10<sup>th</sup> Annual Report on the work on the Independent Assessor. The Report covers the period from 1<sup>st</sup> April 2014 to 31<sup>st</sup> March 2015, and all statistical information is drawn from that period.

The Report provides information on complaints handling within the PPS, and statistical information for 2014/2015, and comparison with previous years. This year complaints have been included which go directly to the PPS HQ Departments.

Detailed reports on complaints referred to the Independent Assessor are shown in Chapter 2. I investigated and reported on all cases which had already been processed fully through the PPS Complaints Procedures. I investigated 9 cases in the year (the same as for 2013/2014). A number of the cases were lengthy, as the complainants felt strongly about their particular circumstances, and added various other issues as the cases progressed. These cases demonstrated that complainants often felt genuinely aggrieved, and expressed their complaints cogently and articulately, whether or not the complaint could be substantiated. This underlines the necessity for the matter to be fully and thoroughly investigated, and a clear, timely and thoughtful explanation be provided to them. In such instances, while the complainant may not be able to accept the PPS point of view on the substantive issues, they often appreciate, and express satisfaction as to how their complaint has been handled.

This Annual Report also provides information on my other work as Independent Assessor of Complaints including benchmarking with complaints handling procedures in other organisations with the aim of meeting with very best practice, and aiming to contribute to the PPS's vision of being a first class prosecution service for the people of Northern Ireland. Part of the function of complaints investigations is to identify existing best practice, and also to identify where and when amendments and improvements can be made. Apart from the

procedures themselves, investigations have identified areas for improvement in general working processes, and I am satisfied that throughout the year the PPS have accepted and implemented my recommendations in this regard. I report at Chapter 5 on significant amendments which have been made this year to the Complaints Handling Procedures, which have demonstrably improved the efficiency and responsiveness of the overall complaints processes.

A further element of my work is my audit function. As stated, I investigated 9 cases in the year which had been specifically referred to me. However, there had been a total of 89 complaints made to the PPS, and I reviewed the large majority of these cases in my full audit, to, amongst other things, monitor complaints handling in general, identify any themes occurring, and to understand the full complaints handling situations across all PPS locations. My audit report is at Chapter 3.

At Chapter 4 of the Report, I display the number of complaints handled this year, an analysis of the complaints and my comments under headings, as appropriate.

At Chapter 5 of the Report, I outline a summary of the PPS Complaints Procedures.

At Chapter 6 of the Report, I lay out my role and remit as Independent Assessor.

During the year I met with the Director, Deputy Director, and also the Senior Assistant Director, Regions, Prosecutions, and the Senior Assistant Director, Resources and Change. I also met the Regional Prosecutors personally, and attended a Senior Management meeting where I gave a presentation on current issues including the amendments to the Complaints Procedures and issues arising from recent and current complaints cases.

***I would like to record my thanks and appreciation for the support and assistance which I have received from the PPS Central Co-ordination Team.***

## **Chapter 2:**

### **Case handling work of the Independent Assessor in 2014/2015**

I investigated a total of 9 cases in the year, the same number as last year. A number of the cases involved extensive investigation, and communication by email, letter and telephone. In all cases, I have made recommendations, where appropriate, and I am satisfied that these have been taken on board, and implemented.

#### **Case 1**

This case was carried forward from 2013/2014 and reported on briefly in my previous Annual Report. The complaint arose following a minor traffic accident in January 2013. The case had been heard in Court in June 2013, and the complainant had been found guilty on a charge of driving without due care and attention, but two further charges against her were dismissed by the District Judge. She lodged a complaint to the PPS in September 2013. The main elements of the complaint were that she felt she should not have been prosecuted, as the police had not carried out a proper investigation, and this should have been evident to the PPS when they were considering their prosecution decision. She also felt that a proper review of the decision as requested by her and her solicitors had not been carried out which might have resulted in the prosecution decision being overturned. The complainant also asserted that the duty of full and timely disclosure of evidence had not been made by the PPS prior to the Court hearing.

The complaint was fully responded to by the PPS internally through both tiers of the Complaints Procedures. All her claims were refuted by the PPS although there was an acceptance that the police investigation had not been satisfactory.

The complainant remained dissatisfied with the PPS responses, and raised her complaint with me, additionally requesting that I consider the timeliness of the PPS handling of her complaint.

I carried out a full investigation, and concluded that the PPS should have sought further clarification and information from the police, and that the review of the police investigation was therefore unsatisfactory. In relation to reviews of the prosecution decision, there was clear evidence that such reviews had indeed been carried out. However, the outcomes of these reviews had not been communicated directly to the complainant or her solicitors, which again was unsatisfactory. As regards the issue of disclosure of evidence to the complainant, I considered that such evidence should have been provided to the complainant in a more timely fashion.

Finally, I considered the PPS's overall handling of her complaint. I found that the complaint had been handled in a satisfactory and responsive manner, and full investigations carried out. The timeliness of responses had been somewhat elongated, owing to holiday periods and the need for thorough investigations. However, no updates on progress had been provided to the complainant nor had an explanation of the complaints process been provided, as had been requested.

I communicated my full report to the complainant, and to the Director, who responded accepting my recommendations, and I am satisfied that appropriate remedial measures have been implemented within the PPS.

## **Case 2**

This complaint essentially arose from a protracted family custody and access situation following the breakup of a relationship between the complainant and his then partner. The matter had become acrimonious, and the Courts had issued a Non Molestation Order against the complainant relating to his ex-partner. The complainant asserted that the NMO should not have been issued in the first place as his ex-partner had committed perjury in obtaining it. However, the complainant then breached the NMO in frequently contacting his ex-partner, and flowing from this the PPS decided to prosecute him. The Court found him guilty, and this verdict was upheld on appeal. The complainant felt that the decision to prosecute him had not met the full evidential test for prosecution, in regard to the public interest test. He felt that there was no public interest in pursuing his prosecution.

A second aspect of the complaint arose from an incident which had allegedly taken place when the complainant was having a discussion with his ex-partner and her mother near their home. The complainant alleged that his ex-partner's mother had assaulted him. The alleged assailant had been interviewed by the police, but no charges had been brought. The complainant felt that the PPS should request the PSNI to re-interview the alleged assailant, potentially leading to a decision to prosecute her.

The complainant lodged his formal complaint with the PPS, and as he remained dissatisfied with the responses which he received he referred his complaint to me. In his complaint to me, he asked me to focus specifically on his two main issues i.e. the question of the public interest element of the decision to prosecute him for breaching the NMO, and the aspect as to whether the PPS should seek to get the police to re-interview his alleged assailant. He also wished me to investigate how the PPS had handled his case at court and how effectively and speedily the PPS had looked into his complaints. The complainant advised me that he was pursuing various aspects of his complaint with several other bodies including the PSNI, the Police Ombudsman, the NI Court Service and the Judicial Service, and

he included in his correspondence many references to national, European and international law.

I carried out a full investigation into this complaint, having initially advised the complainant of the limits of my remit. The previous correspondence in the matter was substantial and voluminous. I reviewed the quality and timeliness of the responses from the PPS, and I concluded that the complaint as a whole had been handled fairly and professionally, in a largely timely manner. The major issues which the complainant had raised relating to the PPS were primarily prosecutorial in nature, and these had been responded to by the PPS comprehensively. I was able to assist the complainant with other aspects of his complaint, and to point him to other authorities to whom he should address other elements of his complaint. While the complainant could not accept the prosecution decisions in his case, he was satisfied with the investigations which had been carried out both by the PPS and myself. He continued to correspond with me for a considerable time, until finally accepting that there was nothing further that could be done to assist him.

I communicated my findings in this case to the complainant, and to the Director.

### **Case 3**

This complaint arose from an alleged assault in a public house in 2013. An individual had been charged with assault and a PPS prosecution file prepared. However, when the case came to Court, the District Judge dismissed the case as, although he had found merit in the case, he also found that there were inconsistencies in the evidence presented to him. The complainant felt that the PPS had not handled the case effectively, and he complained to the PPS. He remained dissatisfied with the responses received and raised his complaint with my predecessor as Independent Assessor, who had responded in March 2014, advising the complainant that he found that the PPS had prosecuted the case correctly and fairly. The complainant then wrote to me, raising some additional issues concerning a potential witness who had not been called to Court. I fully reviewed the files in the case and investigated the additional points which the complainant had raised with me. My investigation showed that these issues had been responded to by the PPS in previous correspondence, and I concluded that the additional points were without foundation.

I communicated the outcome of my investigation to the complainant and to the Director.

### **Case 4**

In this case, the complainant had made a report of alleged fraud to the PSNI in April 2013. Subsequently throughout 2013, she said that both she and her solicitor, had sought information from the PPS both in writing and by phone call. The complainant then lodged a formal complaint to the PPS in January 2014, and again in February 2014, but apparently

received neither an acknowledgement nor a response. She then wrote to me in November 2014 lodging a formal complaint.

My initial investigation confirmed that the initial complaints had not indeed been progressed through the PPS Complaints Procedures. As a first step, I asked that the PPS deal with the complaint, and the issues raised, as a matter of urgency, and I established with the complainant that she was satisfied with this course of action. I assured her that if she remained dissatisfied with the response she received from the PPS, then I would be happy to carry out a full investigation at that stage. The complainant subsequently advised me that the PPS had responded to her in full, and that she wished to withdraw her complaint to me. It was quite clear that despite a full response from the PPS, after my intervention, with which she was satisfied, there had been unacceptable delays in dealing with her initial written and telephone complaints. I discussed these issues with PPS Senior Management, and received assurances that measures had been put in place to avoid such events happening in future. This will be subject to my ongoing monitoring and oversight.

#### **Case 5**

The background to this case was that a fracas had taken place inside and outside a shop in Bangor, involving the complainant and a shop assistant. The complainant had received some injuries for which he was treated in hospital. Arising from the incident, the shop assistant had been charged with possession of an offensive weapon and found guilty in Court. The complainant lodged a series of complaints against both the PSNI and the PPS. The majority of the complaints were prosecutorial in nature, both in terms of the nature of the charge brought by the PPS against the defendant, and also about how the matter was dealt with by the PPS in court. All of these issues had been the subject of lengthy and detailed correspondence between the complainant and the PPS through the first and second stages of the PPS Complaints Procedure. The complainant remained dissatisfied with the responses which he received from the PPS and raised the matter with me.

I reviewed all the papers in the case and corresponded with the complainant on a number of occasions. While I subsequently advised the complainant that I was unable to make findings in relation to primarily prosecutorial matters as they are out of my remit, I was able to provide clarification for him in this regard. The complainant had alleged that there had been undue delay by the PPS prior to the Court case, thus compromising the case. I examined in detail the chronology of events leading up to the Court case, and in my final report advised him that I could not support his contention of undue delay, and I was satisfied that the matter had been handled in a timely fashion.

I examined how the complaint had been handled through the PPS Complaints Procedures, and once again, the complainant's communications had been dealt with efficiently and

promptly. In a final response from the complainant, while remaining dissatisfied with some of the decisions and actions of the PPS, he expressed satisfaction with the investigation and reviews which had taken place throughout the Complaints Procedures, and would not be pursuing the matter further.

I communicated the outcome of my investigation to the complainant and to the Director.

### **Case 6**

This complaint arose from an incident in which a 12 year old boy had been assaulted by an adult. Following a police investigation, the PPS took the decision to prosecute. Subsequently the boy's father lodged a complaint expressing dissatisfaction with the PPS's handling of the prosecution. The complaint had been dealt with at tier one of the Complaints Procedures, and then the complainant referred the matter to me. Associated with the complaint were numerous exchanges which the complainant had already had with the PPS. As the complaint had not been fully processed within the PPS Complaints Procedures, I passed the complaint back to the PPS, with the agreement of the complainant, to carry out a tier two investigation.

As a result, a further response was sent to the complainant by the Senior Assistant Director and the complainant did not pursue the complaint with me. However, the original correspondence which had been copied to me revealed a series of serious failings by a PPS Support Unit, leading to a failed prosecution. The PPS accepted that the prosecution had been seriously mishandled, and had apologised on a number of occasions to the complainant. I discussed with them what remedial measures had been put in place to avoid a repetition of the serious failings which had occurred. I received assurances that actions had been taken, but clearly the work of PPS Support is integral to the whole prosecution service, and needs to be managed effectively.

### **Case 7**

The complainant and his wife were involved in an altercation, and an assault, outside licensed premises in Bangor. Following an investigation, a file was prepared by the police and submitted to the PPS. The PPS took the decision to prosecute one of the parties involved in the altercation. The case was heard in court in June 2014, without the defendant being present. The complainant lodged a formal complaint to the PPS arising from his perception that the service he had received from the PPS prior to the Court case, and the handling of the case by the PPS at court was unacceptable. These issues revolved around his assertions that the PPS had failed to act when the defendant did not appear in Court, that the complainant's wife had been advised by the PPS to drop her case of assault against the defendant, and had not done so voluntarily, that there should have been a more serious

charge brought against the defendant, and finally, that the PPS should have sought further medical evidence in the form of a CT scan to support his case.

The complainant met with the Regional Prosecutor in June and August 2014, to discuss his complaint, and received a full written response. The complainant remained dissatisfied and raised the matter to tier two of the Complaints Procedures. A further meeting was held between the complainant and an HQ Assistant Director, in October 2014, followed by a full written response.

The complainant referred the matter to me. I carried out a full investigation, having advised the complainant that I could not deal with issues which were primarily prosecutorial in nature.

I concluded that all of the issues raised by the complainant were mainly prosecutorial in nature, apart from the overall handling of the complaint by the PPS. However, it was clear that the PPS had gone to considerable lengths to explain the circumstances of their actions to the complainant, including three separate meetings, and detailed discussions with the Court prosecutor. The overall handling of the complaint by the PPS was exemplary, including the timeliness and clarity of the lengthy responses.

I communicated the outcome of my investigation to the complainant, and to the Director.

## **Case 8**

This complaint arose from a minor traffic accident in Belfast in June 2013. Following a police investigation, the PPS considered that there was sufficient evidence to pursue a prosecution against the complainant. The case was heard at Court in November 2014, and the complainant was found guilty. She appealed the decision, but her appeal was unsuccessful.

The complainant lodged her complaint to the PPS in November 2014, asserting that the police investigation had been unsatisfactory and biased, that the PPS should not have decided to prosecute her, and that the Court prosecutor had treated her harshly in Court.

The complaint was handled at tiers one and two of the Complaints Procedures, but the complainant remained dissatisfied and referred her complaint to me. I fully investigated the complaint, having advised the complainant of the limits of my remit in relation to prosecutorial matters. In my investigation, I noted that the PPS had advised her that the Police investigation was a matter for the PSNI, and that the PPS had explained the application of the test for prosecution to her. They also outlined the role of a District Judge in considering the evidence before him. The Court prosecutor has also been consulted and the PPS were satisfied that the complainant had been treated fairly in Court.

I concluded that the PPS had provided timely and detailed responses to the complainant, and that the overall handling of the complaint had been very good.

I communicated the outcome of my investigation to the complainant, and to the Director.

### **Case 9**

This complaint arose from a death in a nursing home. The police investigated the matter, and a file was prepared for the PPS. The complainant had worked in the nursing home, and her complaint related to the length of time the PPS took to reach a prosecution decision. I will report fully on this case in my next Annual Report.

### **Other cases**

In addition to these cases, a further six communications were received from complainants during the year. In each of these cases, after making enquiries with the PPS and the complainants, I was able to establish that the complaints had not been progressed fully through the PPS Complaints Handling System, or only partially so, so with the agreement of each of the complainants, I referred the complaints back to the PPS. I assured the complainants that if they remained dissatisfied with the responses from the PPS they could still bring the complaint to me.

## **Chapter 3:**

### **Audit**

#### **General**

As part of my remit, I have carried out a comprehensive audit of complaints dealt with at Level 1 (Regional Prosecutor), and Level 2 (HQ Assistant Director), and which were received by the PPS between 1 April 2014 and 31 March 2015. I reviewed a total of 48 cases, broken down as follows: 20 from Eastern Region, 17 from Belfast Region, 6 from Northern Region and 5 from Western and Southern Region.

During the year, a series of amendments were made to the PPS Complaints Procedures. I have commented on these in this Annual Report, Chapter 5, and during the audit I noted a number of cases which had been elevated from Tier 1 to Tier 2. Under the new procedures, Tier 2 cases are now handled by Assistant Directors from a different part of the organisation, rather than a Senior Assistant Director. My audit demonstrated that these parts of the procedural changes which were implemented during 2014/2015 have worked well and that all of the cases I observed were handled promptly, and the responses were comprehensive and professional.

#### **Report**

Once again in 2015, there is a disparity in the numbers of complaints originating from the four Regional areas, and once again the order from the highest numbers to the lowest was Eastern, Belfast, Northern and then Southern and Western. As I have said before, I do not believe this relates to a lower standard of service being provided by the Regional Offices with the greatest number of complaints, but more a reflection of a number of issues, including different interpretations and definitions of a complaint. I still remain unclear as to why there should be such a difference in interpretations as the stated interpretation in the PPS Complaints Procedures appears to be quite clear:

“Any communication which expresses dissatisfaction with or criticism of, the service provided to the community by the Public Prosecution Service.”

It seems to me that this issue needs to be investigated, tackled and resolved, before the PPS can be said to deliver a truly first class complaints service.

The Independent Assessor of Complaints booklet for the PPS lays out some examples of the types of complaints which I may investigate and which by extension would apply at Levels 1 and 2 of the Complaints Procedures:

- The effectiveness/efficiency of the work of the prosecution service (for example, the time taken to process the case, or the promptness of witness expenses payments).
- The manner in which a person was treated by a member of staff of the PPS, or by someone acting on behalf of the PPS.
- Any failure to adhere to the PPS's Code for Prosecutors, or Code of Ethics.

Once again I recommend that the general definition and the examples from my guidance are considered when any communication from a member of the public is being assessed. Equally, I am clear that other factors are playing a part in the disparity of numbers of complaints from Regional Offices, and as I have indicated before this needs to be investigated and resolved by the PPS.

One area which has shown significant improvement is that of the number and % of complaints acknowledged within 5 days, and this is reflected in the formal annual statistics, which show the % rising from 58% in 2013/2014, to 82% in 2014/2015. It is clear that this has come about through another change in the Complaints Procedures during the year, which was the centralisation of initial complaints in to the Central Coordination Unit (CCU) in Belfast. I would expect this % to increase further in the current year, as the centralisation to CCU only took place midway through 2014/2015. Additionally, a few complaints still go directly to the Regional Offices, or to PPS HQ. The success of the new process was demonstrated by the fact that in my audit, I did not note a single example of the CCU not acknowledging an initial complaint either on the day of receipt, or the following working day, and then forwarding the complaint to the appropriate Regional Office. I consider that this system change has proved extremely effective, in enhancing the Complaints Procedures, and I commend the PPS for it.

In my 2013/2014 audit, I drew attention to, and highlighted two specific cases of concern. These were the issues of correspondence from the PPS being sent to incorrect addresses, and instances where victims and witnesses had not been advised of key information or dates, sometimes as a result of errors or omissions by PPS Support Units. In this current audit I did not detect a single example of incorrect addressing, and only one example involving a lack of timely communication from a Support Unit, although this was a particularly poor case, and I comment on it at Chapter 2. My conclusion is that the remedial measures effected in these areas following my last audit have been largely successful.

Once again this year, as in 2013/2014, I noted many examples, of exemplary complaints handling, of gold star status. Invariably, these examples demonstrated the qualities of professionalism, excellent timeliness (appropriate to the complexity of the complaint), courtesy, evidence of a thoughtful thorough investigation, and first class drafting. These

complaints were acknowledged promptly, and a clear, jargon free, well drafted response was despatched, again in a timely manner. I noted that full apologies were proffered where appropriate, and the final response was signed off by the Regional Prosecutor.

I think it useful to detail some examples from Regional Offices which amply demonstrate best practice, and fulfil the criteria which I have mentioned above.

- A complaint was received from a firm of solicitors, which was acknowledged on the same day by the CCU, and further acknowledged by the Regional Prosecutor on the following day, who also promised a prompt response. A full and comprehensive response was sent two days later, by the Regional Prosecutor, after input and comments from Prosecutors who had handled the specific court case.
- A letter of complaint was received alleging unprofessional conduct by Prosecutors involved in a case. The latter was acknowledged the following day by the Regional Prosecutor, and four days later a comprehensive, excellently drafted response was sent. Subsequently, a letter of appreciation and thanks was received from the complainant.
- A letter was received criticising the behaviour of a Prosecutor, and a full response was sent four days later, by the Regional Prosecutor. This was excellently drafted, and demonstrated that a full investigation had been carried out. No further communication was received from the complainant.

There were many other such examples, and I commend the PPS for their first class public service in these instances.

Invariably, there were a number of examples of complaints handling where the standard fell well short of that expected from a public service. I list below some generic examples of poor practice which I observed:

- Delays, sometimes considerable, in responding to complaints.
- Instances where it appeared that no response at all had been sent.
- Cases where the Regional Prosecutor had been prompted by the CCU to respond to a complainant, sometimes without effect.
- Instances where there had been considerable delay in responding, without any form of update being provided by the Regional Prosecutor.
- Incorrect information being supplied to persons, who subsequently complained.
- Responses not personally signed off by the Regional Prosecutor.
- Poorly drafted responses, which did not convey the impression that the complaint had been thoroughly investigated.

- The proffering of partial or unconvincing apologies, in circumstances where it appeared that a full and unreserved apology would have been appropriate.
- The absence of reference to complainants of the opportunity to avail of the second tier of the Complaints Procedures, in circumstances where this would have been appropriate.

As above, I think it useful to detail some specific examples, which I noted, of poor practice.

- A public body had been seeking information on a quarterly basis from the PPS in relation to a Court hearing. Over a considerable period of time the body was given either no information, or even worse, incorrect information. Following a complaint from the body, a highly unsatisfactory response was sent, which offered a partial apology, contained no clear statement of what had gone wrong within the PPS, and did not indicate what, if any, remedial measures were to be put in place to address the situation. To compound the issue, the complainant's name was spelt incorrectly and the sub-heading of the letter was also incorrect. The response was not signed off by the Regional Prosecutor.
- A complaint via the PPS website was acknowledged immediately by the CCU, and forwarded to the Regional Prosecutor. One month later, the complainant sent a reminder, in the absence of any communication from the Regional Office. A telephone reminder was also made to the Regional Office by the CCU. Three weeks later a response was sent to the complainant, who promptly expressed dissatisfaction with the response, and requested that the complaint be elevated to the next stage of the Complaints Procedures. There is no record of any further communication with the complainant.
- The Regional Prosecutor promptly acknowledged a telephone complaint and advised that a full response will be sent. Eight weeks later a further response was sent, not providing any useful information but instead seeking further information from the complainant. There is no record of any further communication with the complainant.

Clearly, the generic examples which I have laid out, and the specific examples which I have shown demonstrate an unsatisfactory, and in some instances, totally unacceptable level of complaints handling, and public service. They also contrast acutely with the many examples of first class best practice. It is important, indeed essential, for the PPS to seek to address these clear deficiencies if it is to aspire to its vision of providing a first class public prosecution service for the people of N. Ireland.

## **Conclusion**

In conclusion, as I have stated, my audit demonstrated many examples of first class complaints handling and in the majority of cases.

However, I have highlighted specific areas for improvement, and I recommend that the PPS addresses these issues. I remain happy to work with the PPS, through seminars, workshops or input at appropriate management meetings, to discuss these areas and highlight best practice.

## Chapter 4:

### Complaints Handling in the PPS 2014/2015

The PPS maintain comprehensive records of complaints, and an analysis and breakdown of the figures by various categories. These are shown below with my comments on each category, as appropriate. This year, for the first time, complaints going directly to PPS HQ Departments, have been included.

#### Total Complaints

**Table 1: Numbers of complaints and written requests**

Year	Complaints Logged	Written Requests
2007	28	115
2008	41	137
2009	49	109
2010	65	107
2011	70	141
2012	70	160
2013/2014	73	147
2014/2015	89	138

The total number of complaints received by the PPS has remained relatively stable since 2010. However this year, there has been a 22% increase (16 cases) over last year's total of 73. On the face of it this is a substantial increase. However, I do not attribute this to a worsening of the service provided by the PPS, but rather to, firstly, an improving understanding of the definition of a complaint across the PPS, and also this year the inclusion in the figures of complaints made directly to PPS HQ Departments (a total of 6). Apart from this, the overall increase has been spread across three of the four Regional Offices.

**Table 2: Outcome of complaints**

<b>Year</b>	<b>Upheld</b>	<b>Partially Upheld</b>	<b>Dismissed</b>	<b>Resolved Informally</b>	<b>No further action required</b>	<b>Outstanding</b>	<b>Total</b>
<b>2007</b>	4	0	5	0	15	4	<b>28</b>
<b>2008</b>	8	3	12	0	5	13	<b>41</b>
<b>2009</b>	9	7	12	0	7	14	<b>49</b>
<b>2010</b>	12	2	19	1	3	25	<b>66</b>
<b>2011</b>	19	10	19	0	9	13	<b>70</b>
<b>2012</b>	14	6	27	17	6	0	<b>70</b>
<b>2013/2014</b>	11	2	15	32	13	0	<b>73</b>
<b>2014/2015</b>	8	4	44	25	6	2	<b>89</b>

**Table 3: Complaints substantiated (partially or wholly upheld)**

<b>Year</b>	<b>Number of Complaints</b>	<b>% Substantiated</b>
<b>2007</b>	28	36
<b>2008</b>	41	27
<b>2009</b>	49	33
<b>2010</b>	65	20
<b>2011</b>	70	50
<b>2012</b>	70	29
<b>2013/2014</b>	73	18
<b>2014/2015</b>	89	14

Overall 14% or 12 out of the total of 89 complaints were substantiated, representing a reduction of 4% since 2013/2014. There has been a substantial drop in the number and % of complaints substantiated since 2007, with a peak of 50% in 2011. This represents a very satisfactory trend, and would point to a significant improvement in the overall standard of service to the public provided by the PPS. The Regional Office figures ranged from 14% substantiated in Belfast, to 0% at West/South. I do not consider these figures to be statistically significant, as a variation of one or two cases at a Regional Office greatly affects the overall %.

**Table 4: Reasons for complaints**

<b>Reason</b>	<b>2013/2014</b>	<b>2014/2015</b>
Case Handling	32	9
Primarily prosecutorial	4	3
Communication / Information	15	29
Standard of communication	3	0
Conduct of staff / Counsel	9	16
Court Outcomes	6	0
Court Performance	2	22
Administration errors	3	0
Complaints not dealt with	0	2
Delay	0	6
Other	12	10
<b>Total</b>	<b>86</b>	<b>97</b>

*NOTE: Complaints may comprise of a number of elements.*

Case handling complaints fell significantly from 32 to 9. This however is not supported by my Annual Audit and cases which I investigated under the third tier of the Complaints Handling Process. It may be that this is an issue of recording, and it is an issue for the PPS to review to ensure that this element of a reason for a complaint is correctly allocated.

In relation to Court Performance, Court Outcomes and Conduct of Counsel, there has been a significant increase from 17 such cases to 38. This accords with my own reviews of complaints cases, and is a matter of considerable concern. While very few complaints about conduct of counsel are upheld through the internal complaints procedures, nevertheless the fact that there is a perception by complainants about how their cases are handled by counsel before and during a court case is concerning, and I recommend that the PPS review this area to identify the issues, and improve the perception of complainants that their cases are not being handled appropriately at Court.

## Complaints by Regional Area

**Table 5: Total number of complaints received**

Year	Belfast	Eastern	Northern	West /South	PPS HQ	Total
<b>2013/2014</b>	18/73(25%)	36/73 (3%)	12/73 (16%)	7/73 (10%)	0/73	<b>73/73</b>
<b>2014/2015</b>	21/89 (24%)	35/89 (39%)	15/89 (17%)	12/89(14%)	6/89 (7%)	<b>89/89</b>

There remains a continuing disparity in the number and % of complaints between Regional Offices given that each Regional Office deals with around the same number of prosecution cases each year. One would therefore expect approximately the same number of complaints in each area. However in % terms, the figures show the following Belfast 24%, Eastern 39%, Northern 17% and West/South 14%. I have no reason to believe that the service provided by the Belfast and Eastern Regional Offices is any worse than the other two Regional Offices, so the reason for the disparity in numbers of complaints between the Regional Offices remains unclear. The situation is best highlighted by the fact that 35 complaints originated in Eastern Region, and only 12 in West/South. I have drawn attention to this both in my Annual Audits, and my last Annual Report, and it is clearly a matter of concern. I have suggested that part of the reason may be a continuing difference in understanding of the definition and categorisation of a complaint between Regional Offices, although other factors may play a part. The situation therefore remains unsatisfactory, and I recommend that the PPS carries out further work, ongoing monitoring and analysis to clarify and explain the disparity.

**Table 6: Complaints substantiated (partially or wholly upheld)**

Year	Belfast	Eastern	Northern	West / South	Other	Total
<b>2013/2014</b>	8/18 (44%)	1/36 (3%)	4/12 (33%)	0/7 (0%)	-	<b>13/73 (18%)</b>
<b>2014/2015</b>	3/21 (14%)	4/35 (11%)	1/15 (7%)	0/12 (0%)	1/6 (17%)	<b>12/89 (13%)</b>

The overall % of complaints substantiated fell by 5% with variations ranging from 0% to 17% between Regional Offices. However I do not consider this to be statistically significant

because of the small numbers. It is noteworthy however that Belfast reduced their % of complaints substantiated by 30%

**Table 7: Numbers of complaints acknowledged within 5 days**

Year	Belfast	Eastern	Northern	West / South	Other	Total
<b>2013/2014</b>	13/18 (72%)	20/36 (56%)	5/12 (42%)	3/7 (43%)	-	<b>42/73 (58%)</b>
<b>2014/2015</b>	21/21 (100%)	31/35 (89%)	6/15 (40%)	9/12 (75%)	6/6 (100%)	<b>73/89 (82%)</b>

The number and % of initial complaints acknowledged within 5 days has increased from 42 out of 73 (58%) in 2013/2014, to 73 out of 89 (82%) in 2014/2015. This represents a very significant increase, and is very much a reflection of one of the changes made to the PPS Complaint Procedures in 2014/2015. The change in question is the centralisation of initial complaints into the CCU, which has clearly been a great success. Indeed the figures would have been even better, but the new process only came into effect midway through 2014/2015, and I would expect the figures in a full year to exceed 90%. As I have said in my current Audit Report (Chapter 3), I was unable to note a single initial complaint received by the CCU which was not acknowledged and forwarded to the appropriate Regional Office on the day of receipt, or the following working day, and I commend the PPS for this.

The importance of a prompt response to an initial complaint cannot be over stated. It is well understood that such an initial response greatly enhances the perception of the organisation in the eyes of any complainant.

**Table 8: Numbers of complaints dealt within 20 days**

Year	Belfast	Eastern	Northern	West / South	Other	Total
2013/2014	14/18 (78%)	20/36 (56%)	5/12 (42%)	3/7 (43%)	-	<b>42/73 (58%)</b>
2014/2015	14/21 (66%)	16/35 (46%)	1/15 (7%)	4/12 (33%)	6/6 (100%)	<b>41/89 (46%)</b>

The number and % of complaint cases completed within 20 days fell from 42 out of 73 (58%) in 2013/2014 to 41 out of 89 (46%) in 2014/2015. I have said in the past that I understand that some cases will inevitably take longer than 20 days to complete due to their complexity. This is acceptable as long as the complainant is kept informed and updated as to progress, and given a clear indication of when the complaint will be finalised, as specified in the PPS Complaints Procedure.

The % decrease in overall numbers of cases completed in 20 days is a matter of concern, and I have noted the disparity between locations, ranging from 7% completed within 20 days in Northern Regional Office to 100% at PPS HQ and 66% in Belfast. It goes without saying that there is considerable scope for improvement in this area, particularly since I noted in my audit, cases where no update had been provided, no reference to the next tier of the Complaints Procedure, and in a small number of cases, no evidence that the complainant had received a final response at all.

## **Chapter 5:**

### **Complaints Handling Process in the PPS**

#### **General**

The Case Handling Process in the PPS has been successfully in place for a numbers of years. The PPS is committed to providing a high standard of service at all times. If the PPS provide an ineffective or inefficient service or treat someone impolitely or unfairly or if there is a failure to adhere to the PPS' Code of Ethics or Code for Prosecutors, the complaints process provides a sound and practical mechanism for the PPS to learn about it. The really important aspect is that the PPS investigates the complaint thoroughly and, where it is justified, ensures that the lessons are learnt, and the PPS strive to put things right, and improve the overall standard of service it provides to the public. A key component of complaints handling is that the complaint is handled professionally, and with sensitivity and courtesy at all times.

#### **Definition of a complaint**

The PPS definition of a complaint is:

*“Any communication which expresses dissatisfaction with, or criticism of, the service provided to the community by the PPS.”*

Such complaints may relate to:

- The effectiveness and efficiency of the work of the prosecution service; for example, the time taken to process a prosecution case or the promptness of payment of witness expenses.
- The manner in which a person was treated by a member of staff of the PPS or by someone acting on behalf of the PPS (for example, a barrister instructed by the PPS).
- Any failure to adhere to the PPS Code for Prosecutors or Code of Ethics, that is, which does not relate to a prosecutorial decision. The PPS Code for Prosecutors, which includes the Code of Ethics, is available via the PPS website at [www.ppsni.gov.uk](http://www.ppsni.gov.uk).

It should be noted that the PPS complaints procedure is not the appropriate mechanism for defendants to seek to have the cases against them withdrawn or to overturn their convictions. If you are a defendant in this situation your complaint will not be considered as part of our complaints procedure. You should instead seek independent legal advice.

Where a complaint relates to ongoing criminal cases, we may only be able to provide limited information. We reserve the right not to deal with a complaint in relation to an ongoing case if it might prejudice the proceedings.

### **Who can make a complaint?**

Any person who has had contact with the PPS in whatever capacity can make a complaint. A complaint can be made directly by an individual or through their nominated representative, for example, a family member, solicitor, support group or public representative.

### **How can a complaint be made?**

There are a number of ways in which to make a complaint. These are listed clearly in the PPS Complaints Handling Procedures displayed on the PPS website, and copies may be obtained in a variety of formats. Essentially, complaints may be made by email, letter or directly via the PPS website, by telephone, and by SMS text.

### **What information will I need to provide?**

To help us in dealing with your complaint, the following information would be appreciated:

- Your name, address and contact details; this may include details of any representative whom you may want to have with you or speaking for you.
- Full details of the complaint, providing as much information as possible, including dates, the sequence of events which gave rise to concern and, if known, the names of persons involved.
- If applicable, the PPS reference number quoted in any previous correspondence you may have received.

It would also be helpful if a preferred means of contact was included, as well as an indication of the most suitable time for our staff to contact you.

In order to help you to provide all necessary information, a complaint form is available to download from the PPS website. Central Co-ordination Branch will also forward a copy of the form by post or e-mail on request.

Please note that depending on the nature and/or complexity of the complaint, it may be necessary to ask you for further information at a later stage.

### **How quickly will my complaint be dealt with?**

The PPS will acknowledge receipt of your complaint, via your preferred method of contact, within 5 working days. We will normally seek to make a full response within 20 working days.

If it is not possible to make a full response within 20 days, you will be informed why the response has been delayed and given a revised target date for a full response.

### **How long do I have to make my complaint?**

Unless there are exceptional circumstances, a complaint will only be dealt with if it is made within 6 months from the date of the incident in question.

### **Can the matter be resolved informally without making a complaint?**

Some individuals who are dissatisfied with the service that we have provided will simply want someone to review their concerns as quickly as possible – without the need to lodge a formal complaint. In such instances it may be possible for the cause of the dissatisfaction to be resolved immediately and we will aim to do so by providing an explanation, apology or other appropriate outcome.

The initial step is to contact us in order that the matter might be resolved informally. If you are interested in an informal resolution, please contact us either by telephone (02890 897100) or by email to [info@ppsni.gsi.gov.uk](mailto:info@ppsni.gsi.gov.uk).

If we are unable to resolve your concerns satisfactorily via this process, then you may wish to pursue a formal complaint following the outlined procedure.

## **What can I do if I am dissatisfied with the way my complaint has been dealt with?**

Most complainants are satisfied at the initial investigation stage (Tier 1). If you are not satisfied with this response, you must tell us within one month of receiving our explanation. Complaints received outside of this timescale will not be considered.

In such circumstances your concerns should be set out in writing to:

Head of Central Management Unit  
Public Prosecution Service  
Linum Chambers  
Bedford Street  
Belfast BT2 7ES

Normally your complaint will be referred to an Assistant Director from a different area of the organisation (Tier 2) For example, where your complaint is in relation to a regional office, the review will be conducted by an Assistant Director from PPS Headquarters.

## **Is there any appeal against the way the PPS has decided to deal with my complaint?**

There is an external independent assessor who will review a complaint where the complainant is not satisfied with the way in which the PPS has decided to deal with the matter. The Independent Assessor operates with full independence from the PPS.

The Independent Assessor can investigate your complaint only:

- After the matter has been investigated by the PPS, and that having been concluded, you are still not satisfied; and
- If it is not primarily prosecutorial in nature. While the remit of the Independent Assessor allows for the consideration of failures against the PPS Code for Prosecutors or Code of Ethics, he is unable to comment on matters which relate directly to a prosecutorial decision. A prosecutorial decision includes the decision whether or not to bring a prosecution and any decision made in the course of criminal proceedings which relate to the conduct of the prosecution.

You may contact the Independent Assessor by the following methods:

By Letter:

Alan Henry OBE

Independent Assessor of Complaints for the Public Prosecution Service

P.O. Box 928

Belfast BT1 9AN

By email: [independent.assessor@gmail.com](mailto:independent.assessor@gmail.com).

The Independent Assessor operates a confidential and secure service. On receipt of your complaint he will deal with you directly and will make available to you a copy of a leaflet which explains his role and remit in more detail. The PPS will permit the Independent Assessor access to the files relating to your complaint and will seek to meet his requests in full as he investigates your concerns.

### **Policy on unacceptable actions or behaviour by complainants**

The PPS understands that individuals may act out of character in times of difficulty or distress. Indeed a complainant may have encountered upsetting or distressing circumstances prior to bringing a complaint to the PPS. Therefore the PPS does not view actions or behaviour as unacceptable simply because a complainant is assertive or determined. However, the actions or behaviour of complainants who are angry, demanding or persistent can result in unreasonable demands on the PPS or unacceptable behaviour towards PPS staff. Whilst there are relatively few complainants whose actions or behaviour the PPS will consider to be unacceptable, the Service reserves the right to restrict complainant contact, particularly where the actions or behaviour present a threat to the safety of PPS staff.

A copy of the PPS Policy on Unacceptable Actions or Behaviour by Complainants is available on request. Alternative formats of this policy are also available.

### **Complaints about partner organisations**

The PPS works in partnership with a number of organisations to provide a range of services, for example to victims and witnesses. Complaints about the delivery of services by partner organisations should be directed in the first instance to these bodies. The PPS website includes a range of useful contact points in this regard.

## **Can I ask about prosecutorial decisions or request reasons for a decision not to prosecute?**

Requesting a review of a decision:

People should be able to rely on decisions taken by the PPS. Normally if the PPS tells a suspect or a defendant that there will not be a prosecution, or that the prosecution has stopped, that is the end of the matter and the case will not start again. However, there may be reasons why the PPS will review this decision, for example where new evidence or information becomes available or a specific request is made by a person, typically a victim, involved in the case. Requests may be made directly by an individual or through a nominated representative (for example, a family member, solicitor, support group or public representative).

When requesting a review, a person may be able to provide further evidence or information which has not previously been taken into account. In such a case the public prosecutor who made the original decision will carry out the review taking into account the additional evidence or information. However if no new evidence or information is provided the review will be conducted by a different public prosecutor to the person who made the original decision.

The public prosecutor conducting the review will decide whether the original decision should stand or whether a fresh decision is required. In either event the person requesting the review will be informed.

Requesting reasons for a decision not to prosecute:

In all cases where it does not prosecute the PPS provides reasons for its decisions, albeit in the most general terms. In a range of more serious cases the PPS goes further and gives more detailed reasons. In any case it is open to a member of the public or interested person to ask for further details of why a decision was made not to prosecute. If you wish to request a review of a PPS prosecutorial decision or to make an enquiry regarding the reasons for a decision not to prosecute, please write to Central Co-ordination Branch (address as above) or send an email to [info@ppsni.gsi.gov.uk](mailto:info@ppsni.gsi.gov.uk).

The Independent Assessor of Complaints does not have any role in the review of prosecution decisions or in the giving of reasons for decisions.

## **Complaint handling: Monitoring arrangements**

The PPS is committed to ensuring that these complaint handling arrangements are effective. Therefore on completion of each complaint case, we will send you a short follow-up questionnaire asking you to provide feedback on the way your complaint was handled.

Monitoring will of course be undertaken in a confidential way. All information provided will be held securely and questionnaires can be submitted anonymously (that is, we will not require your name). However we will ask you to provide some information about yourself (for example, your age and gender). As set out in the PPS Equality Scheme, drawn up in accordance with section 75 of the Northern Ireland Act 1998, the PPS is committed to monitoring any adverse impact as a result of any its policies to which section 75 applies. Monitoring of complaints is essential in this regard and can assist the PPS to deliver a better service.

## **General principles to be followed by the PPS**

The complaint handling process will be open and accessible.

- Complaints will be dealt with in a timely, effective and consistent manner.
- Complaints will be considered fairly and impartially in line with the policy and procedures set out in the PPS Complaint Handling Policy.
- Complaints will be investigated by individuals other than those about whom the complaint was made.
- Members of the public making a complaint will be dealt with professionally and with sensitivity and courtesy at all times.
- The complaint handling process will deliver continuous improvement.
- The Independent Assessor will consider all complaints properly referred to him and also report annually to the Director of Public Prosecutions. He may make recommendations, and the Director is obliged to respond to these recommendations.
- The Independent Assessor will audit a proportion of all complaints received. The purpose of this is to identify any patterns and to obtain a clearer picture of the types of complaints being received.

## **Chapter 6:**

### **Role and Remit of the Independent Assessor**

The Independent Assessor oversees not only the PPS complaints handling arrangements themselves, but also the development of guidelines and protocols relating to complaints handling. He can also comment on the procedures used and how they were applied, including quality of service, and can make recommendations for improvements to the Director of Prosecutions as Head of the PPS.

The Independent Assessor can investigate a complaint only after that complaint has been investigated by the PPS, and that having been concluded, the complainant remains dissatisfied. An overview of the PPS complaint handling arrangements is shown at Chapter 5. The Independent Assessor will produce a report for each case he investigates, to include his findings, and, where appropriate, his recommendations. These will be forwarded to the Director of Public Prosecutions, for him to consider and respond.

The Independent Assessor will not act as a complainant's advocate, and cannot enforce the complainant's rights. His role has to do with determining whether or not a complaint was handled fairly, thoroughly and impartially by the PPS, and also to influence the adoption of best practice in dealing with complaints. The PPS is obliged by its policies to aim for the highest standards in all that it does, including handling complaints.

As well as handling complaints properly referred to him, the Independent Assessor reviews and audits a proportion of all complaints made to the PPS. The purpose of this is to identify any patterns or themes and to obtain a clearer picture of the types of complaints being raised, as well as changes in patterns year by year.

The Independent Assessor is required to report annually to the Director, and may also make recommendations. The Director is obliged to respond to these recommendations.

#### **Complaints which may be investigated**

The Independent Assessor may investigate all complaints, with the exception of those which are mainly prosecutorial in nature, that is where they are primarily in relation to a decision by the PPS to prosecute in a particular case. All requests for the review of a prosecutorial decision should be directed to the PPS.

The types of complaints investigated by the Independent Assessor may include:

- The effectiveness/efficiency of the work of the prosecution service (for example, the time taken to process a case, or the promptness of payment of witness expenses).
- The manner in which a person was treated by a member of the staff of the PPS, or by someone acting on behalf of the PPS.
- Any failure to adhere to the PPS's Code of Prosecutors, or Code of Ethics.

### **Length of time the process will take**

The Independent Assessor will take a maximum of 8 weeks to investigate, progress, and conclude a complaint. At the outset of the investigation, the complainant will be told the likely timetable for the case and the complainant advised on any changes in the original estimates for the time required.

### **What the complainant needs to do**

The complainant should normally submit their complaint in writing. This may simply be by letter, providing an outline of the complaint, or he/she may submit by it by email, on tape, in Braille, or other media, or in a language other than English.

The Independent Assessor has discretion to interview the complainant and/or their representative in person, but will not normally do so.

### **The Cost of making a complainant**

The process is free to the complainant. The complainant does not need independent or legal advice when making a complaint to the Independent Assessor. The Independent Assessor cannot award costs or compensation.

### **Completion of the investigation**

When the Independent Assessor has completed the investigation, he will communicate the outcome and his findings to the complainant.

## **Remedies available to the Independent Assessor**

The Independent Assessor may make recommendations to the PPS. The Director is obliged to consider these, and to respond to the Independent Assessor, however, he is not obliged to implement the recommendations.

## **Chapter 7:**

### **Concluding Notes and Recommendations**

This is my second Annual Report as IAC, and I am satisfied that in many respects that complaints handling in the PPS continues to improve. There are many examples of exemplary complaints handling, and in my annual Audit Report at Chapter 3 I have cited such examples, as well as at other parts of this Report. Equally, there are examples of poor case handling, and again I have highlighted examples of these in my Audit Report. It should be the clear aim of the PPS to reduce and eliminate such examples, and I would recommend that some form of benchmarking should take place between Regional Offices, where the examples of best practice could be shared, thus aiming to raise the overall level of complaints handling, and consistency, across the PPS.

A very significant event in 2014/2015 was a review of the Complaints Handling Procedures themselves leading to a number of changes. I am satisfied that these have been beneficial and led to more efficient and responsive complaints handling, as demonstrated by, for example, the significant improvement in acknowledging initial complaints. This reflects overall a better service to complainants, who are, after all, at the heart of a first class complaints handling service. All complaints procedures should be dynamic, and amendments made to reflect external best practice standards through benchmarking and other processes. This will continue to happen.

A further positive example of the amended processes has been the handling of complaints at the second tier by Assistant Directors at PPS HQ. In my Audit, I noted that all such cases were completed promptly, thorough investigations had taken place and excellent, comprehensive responses supplied. I commend the PPS for this.

Associated with issues already mentioned in this Report, I recommend that attention is given to the following areas:

- Benchmarking between Regional Offices and PPS HQ with the aim of achieving a consistently higher level of complaints handling across the PPS. This may have the added benefit of identifying the reasons for the disparity in numbers of complaints recorded from Regional Office to Regional Office.
- Improvement in the numbers of complaints completed within 20 days.
- Complainants to be informed at an appropriate stage of the opportunity to raise their complaint to the second tier of the Complaints Procedures, or to the Independent Assessor of Complaints.

- Responses from a Regional Office to be personally signed off by the Regional Prosecutor.
- Full unqualified apologies to be given to a complainant in appropriate circumstances.
- Where a reply to a complainant is going to be delayed, the complainant must be kept informed, and an approximate date given for the response to be communicated.
- A review of the actions of prosecutors at Court, which have been the subject of a number of complaints throughout the year.

In terms of operational issues:

- An effective system to ensure that victims and witnesses are communicated with promptly and appropriately to ensure that they are kept fully informed of the progress of their case.
- Where reviews of prosecution decisions take place, the individual to be advised promptly of the review outcome.

Finally, the PPS receives less than 1% of complaints in relation to the approximately 50,000 cases it deals with each year, which is highly commendable, and reflects well on the PPS as a whole. Many of these complaints are handled in an exemplary and highly professional manner. A number are not, and it is important for the PPS to address the reasons for this, and implement appropriate remedial measures.

Having seen and reviewed most of the 89 cases received by the PPS in 2014/2015, it is clear that the vast majority of complainants feel that they have a justified complaint, and they express themselves in a reasonable and often very articulate manner. I noted that where the PPS responded to these complainants in an equally reasonable, and courteous and professional manner, and where a clear explanation of the circumstances, including an apology, where appropriate, had been given, the large majority of complainants were satisfied. Where the converse was true, and an untimely and unsatisfactory response was made, the complaint became protracted, with the complainant, often understandably, adding further elements to the complaint. This highlights the advantages of effective and timely complaints handling.

### **About the Independent Assessor**

Alan Henry OBE was appointed as the Independent Assessor of Complaints for the PPS in May 2013. He has 25 years experience in human resources, organisational development and equal opportunities.

He was formerly a Commissioner of the Equality Commission and the Human Rights Commission and was a Civil Service Commissioner. He was an Independent Assessor for the Commissioner for Public Appointments. He was a Lay Panellist for the Office of Industrial and Fair Employment Tribunals. He is a Member of the Doctor's and Dentist's Remuneration Board. He was also a Governor of the South Eastern Regional College and is a Governor of an Integrated College. He is Chair of the N. Ireland Council for Integrated Education.