

**The
Independent
Assessor**

The Independent Assessor of Complaints for the Public Prosecution Service

Annual Report 2024/25

Delivering an Independent and Confidential Service

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About the Independent Assessor

In this report, the Independent Assessor has summarised her activities during the reporting period and set out summaries of all complaints investigated by her 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](#).

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 Havlin
Independent Assessor

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, and, if applicable, to make recommendations arising from complaints that she upholds after independent assessment.

Sarah was appointed to the role of Independent Assessor of Complaints for the Public Prosecution Service in June 2019 for a maximum term of 6 years. This is her final report in the role of Independent Assessor as her 6-year tenure ended in Summer 2025.

Note: A new Independent Assessor (Marian Cree) was appointed on 1 July 2025.

Chapter 1: Organisational Complaints and Feedback as Tools for Learning

Auditing and Benchmarking Method

In my sixth year of reporting as Independent Assessor, I am once again using the matrix and measures based on the principles outlined in the '[Complaint Standards for Northern Ireland Public Bodies](#)' as recently published by the Northern Ireland Public Services Ombudsman (NIPSO). This matrix was first adopted by me in the reporting year of 2022/23 and used again in the reporting year of 2023/24.

The NIPSO standards is an important benchmark for public bodies in Northern Ireland. PPS is a public body which is intentionally excluded from the remit of NIPSO oversight in terms of its complaint handling. This is for important legal reasons. PPS is a prosecuting authority, and its service complaints can often be a complex blend of issues which often include matters of legal challenge, rather than being straightforward service delivery complaints. For this reason, PPS has embraced a method of independent accountability for dealing with feedback and complaints about service delivery by the creation of the IAC, as a third and independent level of scrutiny in unresolved complaints. The reference to NIPSO standards can therefore give PPS some insight into the public expectations of good complaint handling and the use of complaints as levers for change and improvement in the delivery of a quality public service.

In using the NIPSO standards and practice benchmarks, I have found that the PPS continues to demonstrate a very positive institutional attitude to complaint handling and well-structured complaint system. This includes a designated staff team (the Information Management Team) assigned to managing customer complaints and established processes for feeding back learning from complaints into overall organisational practices.

In addition, I have used my own scorecard as part of an overall audit of the complaint scheme and the complaint handling in this reporting year. The scorecard is attached to this report at **Annex 1**. An overall score of **84%** was achieved in this audit, a drop from last year's score (87%). The reason for this decrease is largely due to ongoing issues in responding to complaints within the stipulated target timelines.

This evidence raises a concern that was also noted last year and my conclusion is that PPS staff and resourcing is under sustained and continued pressure which may be the reasons why staff are struggling to meet these targets and standards.

Last year, I noted that there had been two significant achievements in the improvement of complaint handling. The first was the development and publication of new Charter of Complaint Standards, which can be viewed [here](#). The second was the featuring of the work of the IAC and the sharing of experiences at the PPS's Stakeholder Engagement Forum in March 2024.

This year, I can report that I contributed to the review of PPS Organisational Performance conducted by Criminal Justice Inspection Northern Ireland (CJI). This is the first time in my six years as Independent Assessor that CJI has considered the complaint handling process at PPS and the systemic learning which flows from it. This is a welcome development which I am confident will assist PPS, particularly with joined up thinking across all available evidence bases regarding the quality of its service provision, which in turn can help improve its overall performance.

PPS data analysis of complaints at **Annex 2** of this report, and the feeding back of this data into practice shows that PPS actively demonstrates a willingness to learn from the intelligence contained in each complaint as an indicator of scope for improvements, not just in the context of its complaint scheme, but across its entire operational policy, processes and approach and interaction with its stakeholders. This shows that the organisation uses its complaint scheme as a driver of organisational learning and as part of a quality assurance process of evaluating performance across all of its business delivery areas. Complaints are therefore not managed in a 'vacuum' but are an integral part of reflective practice at senior level, and used as a positive driver for change in behaviours, processes and organisational culture.

Experience of Service Users and learning from Complaints and Feedback

Complaints are at their **lowest level in the six years of my involvement with PPS as Independent Assessor**. Of the 40 complaints received, only five remained unresolved after a Stage 1 response and only one of those five complaints, after a Stage 2 response, was escalated to the Independent Assessor. This single complaint was withdrawn after engagement with me.

In my experience, over the last six years, there has been a shift in culture at PPS regarding complaints and feedback, and the skill, confidence and courage of PPS staff has grown and improved. My experience has been that PPS officials have greatly improved in terms of accepting constructive criticism from service users and engaging in difficult conversations, as well as embracing the consequential benefits, which feed back into improving organisational performance. I also see a determination to treat people with empathy and kindness, which comes through in complaint responses, and a commitment to learning, which is demonstrated in the open and honest reflective practice at management level when analysing complaint data.

I have seen a great deal of improvement in emotional intelligence, patience, honesty, courage and understanding. This has been evidenced over and over again during my collection of evidence in the complaint auditing process since 2019. There has been a marked increase in use of open and candid discussion, expressions of support and solidarity with victims of crime and positive changes to tone and style of communication through continual reflective practice.

Many people who come into contact with PPS will be going through the worst experience of their lives and may, very understandably, have little awareness of anything other than their own experience. Complaints about PPS are often rooted in the distress caused by the intimidating and highly emotional experience of going through the criminal justice system. Some complaints made have a wider focus on the structure and culture of the entire justice system – from police to courts to sentencing outcomes. Much of this is not within the gift of PPS to change alone, nor is it within my remit to assess.

Unfortunately, whilst PPS organisational culture in managing complaints is very strong, the process itself has not been performing well this year. Significant resourcing pressure and case backlogs has led to delay in dealing with complaints. The evidence I have seen confirms that resourcing shortages is not only causing delays in prosecutions, which is often a source of dissatisfaction on the part of service users, but it is also clear that increasing workloads on staff has resulted in missed targets for complaint assessment. In six years, I have never seen the achievement rate for complaint response times at such a low level.

It must be recognised that this is not the standard of service that PPS wants to deliver. Internal complaint assessors must uphold complaints about delay, even when those delays are beyond the control of PPS staff. PPS must also communicate strongly with complainants and assure them that the complaint is important to PPS, but that pressures of work means that the complaint cannot be dealt with within the stated response times.

PPS is up for the difficult conversations about its role in improving the overall experience in criminal justice, particularly for victims of crime, with its delivery partners. This includes engagement with the Office of the Commissioner for Victims of Crime and through its own Stakeholder Engagement Forum.

Victims and families of victims often feel aggrieved that they cannot use the PPS complaint process to challenge the decision and authority of PPS in how it has approached and managed the course and strategy of a prosecution. I have welcomed the ability to signpost people who raise these issues to the Office of the Commissioner for Victim of Crime where they may find that their concerns can feed into the Commissioner's overall systemic reviews on victim experience. PPS has welcomed

my interaction with the Commissioner in respect of my dealings with PPS complaints, and the use of signposting to her office has been a useful route for those complainants who have more complex and serious grievances about their experience in the criminal justice system.

PPS leadership has demonstrated an openness to direct engagement with me in cases where complaints have been upheld and where opportunities for learning can be found, and they have implemented several changes to policy and process as a direct result of learning from complaints and improvement recommendations which I have put forward not only this year but every year since 2019.

The PPS approach to complaints is embedded within corporate structures and reporting mechanisms, which demonstrates an even stronger commitment to learning from complaints and treating the intelligence gained from complaints as a call to action for process improvements. I have observed a consistent open and curious attitude to learning from complaints across the organisation. This is compatible with the organisation's stated values:

- Acting with integrity.
- Everyone matters.
- Making a difference.
- Having a strong Voice.
- Succeeding together.

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 are brave and open to recognising that something could have been done better, where an opportunity was missed, where conduct should have been better or when communication should have been better. 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.

I have found that staff, right up to the most senior level, are curious about how their work is perceived by others, especially those who are not used to the legal system and who may find it to be complex and intimidating. PPS staff are always open to reflecting on how their written and verbal communication style is perceived and how it can be improved. I have also found that officials are keen to learn from different perspectives and they look for areas of common ground in a complaint, that they concede points where they can and show willingness to do this at the earliest stages of dealing with a grievance.

Measuring and Evaluating

The NIPSO standards model was very useful in demonstrating how well the PPS complaint handling system compares against the NIPSO model of best practice and to identify if recommended standards set out by NIPSO are embedded in PPS practice of complaint handling and assessment.

My evaluation of the PPS complaint process contained in the following chapters of this report is not simply limited to measuring the performance of a process-based 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 picked up on some anecdotal feedback from service users contained in communications with complainants and I have evaluated the language and tone used in communications and front-facing messaging.

Whether the process is principled, consistent and fair.

This has been measured by assessing the complaint handling system against its own stated performance objectives and testing PPS complaint handling at each stage against the stated procedures of the complaint policy.

How 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.

This can be measured against organisational responses to upheld complaints. Complaints are an extremely valuable tool in the overall analysis of quality assurance and the information contained within complaints can help PPS gain insight into how successful it has been in terms of 'living its values' and to inform its continuous improvement agenda as a 'learning organisation'.

Instead of limiting the value of complaints as an inconvenient diversion that needs to be closed down quickly or only useful 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, to feed into the analysis of overall organisational performance and to gain insight into how willing its people are to embrace a culture of candour, accountability and continuous improvement.

The PPS team responsible for complaints not only handle and manage complaints, but they also record and analyse the data in terms of themes, business locations where complaints arise and the overall numbers of complaints over a five year period for comparative analysis. This is an excellent management method to use complaints effectively as part of an overall quality assurance audit, because it enables leaders to identify any concerning trends in numbers of complaints and repeat problems in certain contexts, for example delay, communication and case handling.

The complaints are tracked across business areas which may be experiencing unusual numbers of complaints. This use of data analytics allows the senior leadership of the organisation to immediately see any areas of concern and to respond accordingly.

It is also 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”*.

In my experience of auditing PPS complaint handling, and particularly the management response to upheld complaints, this statement from the Director is genuine in practice, as well as being a stated position. It is not merely a statement which has been declared without intention. I have compared the user experience within the complaints I have investigated this year and my wider audit of complaints received, in order to test whether 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 lever of change and improvement to service delivery. This will be demonstrated in the following chapters which will provide a detailed examination of the PPS complaint system.

Victims of Crime: The Legal Role of PPS and Managing Expectations

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 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 rigorously defend the charges against them as a person presumed innocent until proven otherwise.

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 commonly held misperception is a frequent underlying theme of complaints against the PPS. Very often the expectation that some people hold as to what the role of a PPS should be, does not always correspond with its actual legal role within the system. Many of the victims I have engaged with, both this year and in previous years, have struggled to understand the difference and the legal boundaries, between public prosecution and victim representation.

It is also in this area of victim grievance where I find that people struggle the most with understanding the separate and distinct pathways of raising a complaint and/or challenge to PPS. Thus, I want to set out as clearly as possible the two different and separate routes of internal challenge to the PPS which are available.

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 me as the Independent Assessor of Complaints if it cannot be resolved at the earlier stages of the internal procedures of the PPS Complaint Policy. 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 or 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 by the PPS 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 are available on the [PPS website](#).

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 judgments of prosecutors on legal issues as these are purely prosecutorial issues.**

‘Blended’ Complaints

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 in which the context of the complaint involves 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 complain that:

- The decision was wrong because there was evidence that was overlooked; and
- In the same correspondence, they might also say that the prosecutor was rude, abrupt and patronising to them.

In a blended grievance like this, the PPS will often refer the entire 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 (under the Code for Prosecutors), AND also evaluate the quality of service complaint (the manner and style of prosecutor’s communication) as a complaint (under the Complaint Policy of PPS).

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, for example by way of an application for Judicial Review.

If a blended grievance like this comes to myself as the 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.

Helping People Understand the Difference Between Prosecutorial Matters and Service Complaints

There are legal and policy reasons why the IAC does not have a role in assessing complaints about prosecutorial matters. This is because the decision-making of a prosecution authority is highly specialised and legally complex. Only another experienced prosecutor has the required skills and experience to make assessments about prosecution decision making, so it is extremely difficult for others without that experience to make a fully informed and credible assessment.

For this reason, the Code for Prosecutors creates a professional internal peer review mechanism to give additional assurance to the prosecutorial decision making process. Other than an application for Judicial Review of PPS decision-making, there is no other available method of external and independent assessment of PPS prosecutorial decision-making. It is specifically excluded from my remit and, as outlined above, the Northern Ireland Public Services Ombudsman does not have any remit over PPS to evaluate how it has handled complaints or to investigate complaints of maladministration.

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

As a result of my previous recommendations, over the past 6 years, the PPS has done quite extensive and admirable work on simplifying this issue for complainants. The Information Management Team has provided excellent communications and resources on the PPS website, which can be provided to each complainant at the outset to help them understand and navigate this complex situation. In particular, a separate one page diagram/process map as well as a new and improved guidance to PPS complaints procedures has been produced, which makes the separation of service complaints and reviews of prosecutorial decisions much easier for people to read and to understand. The development of a [PPS Complaints Charter](#) last year was a significant milestone.

Whilst there are some limitations 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.

Sarah Havlin
Independent Assessor of Complaints
October 2025

Chapter 2:

Evaluation of How Well 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 which is processed in stages:

- Informal/Local Resolution.
- Stage 1 Formal Assessment.
- Stage 2 Formal Assessment.
- Complaints unresolved at Stage 2 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 on the [PPS website](#).

Independent Oversight and Assurance

The Northern Ireland Public Services Ombudsman (NIPSO) does not have any oversight role in the assessment of complaint handling by PPS, nor is there a basis to bring a complaint about PPS in the context of maladministration via NIPSO.

PPS is therefore the exception to the norm in public sector organisations. However, this does not mean that PPS is subject to less accountability oversight than other public bodies. In addition to accountability oversight and external auditing of PPS by the Department of Justice, further independent oversight of PPS operations is carried out by Criminal Justice Inspection (CJI) who provides regulatory oversight by way of thematic reviews on how PPS is performing.

The Office of the Commissioner for Victims of Crime listens and actively responds to victim experience in the criminal justice system and reports directly to the Minister and Department of Justice.

Both of these independent oversight bodies can make recommendations for change and improvement at Departmental policy level.

The IAC provides a different kind of independent input to PPS. The office holder has no statutory role or powers but can carry out a third-tier independent review and audit of service user complaints with a focus on:

- Resolution of unresolved complaints by the invitation of independent scrutiny.
- Promoting the learning and development opportunities which can be derived from upheld complaints as part of the PPS continuous improvement cycle.

The IAC **must** exclude any grievance about prosecutorial/legal decisions of PPS and instead focus on finding out how PPS can restore confidence in its service delivery by responding appropriately and proactively to valuable feedback which may be derived from the service delivery aspect of complaints.

By the time it comes to my attention, a complaint about PPS will have been investigated and assessed by two different PPS senior managers at Stage 1 and at Stage 2. If, after the PPS has given a properly considered view, differences remain between PPS and the complainant, I will often try and resolve issues.

Sometimes there are new heads of complaints at this point which are rooted in perceived shortcomings in how the complaint itself was handled. Sometimes a complainant may have an unrealistic expectation or an incomplete understanding of his or her rights and responsibilities and may wish 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, on their merits and that independent judgement will be brought to bear.

In this regard the creation of the role of the IAC by PPS as a final stage in their complaint process is to be commended. It is a model of good practice of openness and a recognition of the mutual power of accountability for both service users and service providers.

According to the 'Guide to Principles of Good Complaint Handling' by the Ombudsman Association, the best complaint schemes are 'firm on principles, flexible on process'. This guide was a key measuring matrix in my previous assessments of the effective operation of the scheme of complaint handling in PPS. The lessons learned included discovering that 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.

The process, of itself, cannot deal with complaints efficiently without underpinning key principles to support the pathway to resolution. The matrix I have developed for this year's assessment is a similar principle-based approach but is based on that which is set out in the best practice model developed by NIPSO under its recently published 'Complaint Standards for Northern Ireland'.

Like the Ombudsman Association, NIPSO has set out a statement of principles for good complaint handling. It is stated that these principles are "...not a checklist to be applied mechanically". The Statement of Principles are overarching basic principles that the complaints handling procedures of public bodies should reflect and comply with.

Therefore, my audit of PPS this year is to compare the evidence of PPS complaint handling and its underpinning framework against these six core principles, which are:

- Start off right.
- Fix it early.
- Focus on what matters.
- Be fair.
- Be honest.
- Learn and improve.

PPS Complaints: Audit Results Under the NIPSO Six Standards

NIPSO Standard 1: Start off right

Evidence assessed:

- Structure of Complaints Team.
- Resourcing and support.
- Documentation in sample of complaints resolved at Stage 1 and Stage 2 (or earlier).
- Complaints Log for Senior Leadership Team.
- IAC Audit Scorecard.

Conclusions:

- There is effective leadership and governance of complaints.

- PPS creates a culture which prioritises complaints.
- Staff are equipped and appropriately trained to handle complaints. All PPS staff participate in regular mandatory training in areas such as section 75, disability awareness, unconscious bias etc. Staff have also participated in additional training, focusing specifically on complaint handling and dealing with difficult situations. IAC workshops have promoted best practice / positive behaviours and the sharing of ideas within the Service.
- Complaint handling is managed under a well-structured and time bound complaints process.
- Targets for complaint responses are very challenging due to front line resourcing pressures, with the result that complaint assessors are struggling to meet them.
- There is clarity of process, roles and responsibilities.
- PPS provides a clear point of contact in its designated complaint management team.
- Complainants' expectations are managed and complaint responses are very comprehensive in all cases.
- The Complaints Team sets and measures targets for ensuring effective and timely communication.
- Complaint assessors and staff sometimes signpost complainants to advocacy and support services, where appropriate (for example Victim Support NI).

NIPSO Standard 2: Fix it early

Evidence assessed:

- Audit sample of internal complaints assessor responses.
- Upheld complaints – responses and actions.
- Senior Management Complaints Log and Actions.
- Early Resolution attempts.
- IAC Audit Scorecard.

Conclusions:

- PPS endeavours to address complaints early and acknowledges mistakes, where possible.
- Complaint handlers provide an apology, where appropriate.
- Complaint handlers provide prompt, appropriate and proportionate remedies (within the limitations of the scheme).
- Consideration is given to alternative methods of resolution, although this is not always achievable particularly in complex and sensitive prosecutions.
- Complaint responses were successful at resolution in 88% of complaints at Tier 1 and 80% of Tier 2 complaints.

NIPSO Standard 3: Focus on what matters

Evidence assessed:

- Internal complaint response letters.
- Resourcing.
- PPS equality policy and promotion of access to complaint process.
- Training and development of staff.
- IAC Audit Scorecard.

Conclusions:

- PPS puts the complainant at the heart of its process and considerable effort and resourcing is invested in complaint handling.
- PPS accommodates different complainants' needs, where possible, for example alternative formats and translation services can be provided on request.
- PPS Complaints Team members help the complainant access and use the procedure.
- Staff in both functions of administration and complaint assessment listen to people with respect and treat complainants with dignity.
- The scheme provides a safe, secure and confidential service.
- Target timescales have been missed at a significant level. However, where this occurs, the Complaints Team endeavours to update complainants and outline the reasons for the delay.

NIPSO Standard 4: Be fair

Evidence assessed:

- Complaint responses.
- Data on response targets.
- Public facing documents and guidance.
- Staff training and development.
- IAC Audit Scorecard.

Conclusions:

- All investigations are fair and in accordance with applicable law policy and guidance.
- IAC referral is clearly stated in all Stage 2 responses; thus, PPS provides impartial and objective complaint handling where possible and within the limitations of its role as a prosecution authority.

- PPS is struggling to manage complaints within the agreed timescale. In 2019/20, 88% of complaints were dealt with within the 30 day target. This compares with 73% in 2024/25.
- 100% of all complaint responses showed a thorough and proportionate investigation of complaints.
- PPS always delivers complete, comprehensive and appropriate complaint responses.
- PPS complaint responses show clear and evidence-based outcomes.
- Complainants and staff complained about are always treated fairly.
- The scheme is well managed by the Complaints Team which ensures consistent practices across the handling of all complaints.
- PPS provides alternative formats on request. This is stated in all publications and applies across all document types, policies (e.g. the Code for Prosecutors, guidance for service users, statistical bulletins etc.) A request for the Complaint Scheme in a different format has never been made.

NIPSO Standard 5: Be honest

Evidence assessed:

- Complaint responses.
- Complaint log.
- Consistency of practice – comparative analysis of complaint responses.
- Published PPS standards, commitments, and obligations.
- IAC Audit Scorecard.

Conclusions:

- PPS is committed to being open and accountable and an entire section of its website is dedicated to raising complaints and giving feedback.
- PPS maintains full and accurate records of all complaints logged.
- PPS always provides full, honest and clear reasons for decisions.
- PPS has published procedures on its complaint system. Practice improvement is evident from the development of new [PPS Complaints Charter](#).

NIPSO Standard 6: Learn and Improve

Evidence assessed:

- Complaint responses.
- Complaint Action Log to Senior Leadership Team (including learning points and completed improvement actions).

- Reviews of practice.
- Training and development.
- IAC Audit Scorecard.

Conclusions:

- PPS regularly reviews its complaints handling procedures and it is led by a clearly identified team.
- PPS provides complaints handling training for relevant staff and conducts an annual review of learning from complaints facilitated by the IAC.
- PPS cannot publish complaint outcomes for important confidentiality reasons but there is demonstrable use of feedback to help improve service delivery.
- PPS records, analyses and learns from complaints which is clear from the Complaints Log to Senior Leadership Team.
- It has proved difficult to review the complainant's journey and satisfaction rates as PPS complaints are often very contentious and can be extremely sensitive. Surveys have been attempted in the past with extremely low engagement by complainants.
- PPS has a Stakeholder Engagement Forum (SEF).

Anonymous Complaints

PPS has a stated policy on its approach to managing anonymous complaints and whistleblowing complaints. The PPS has a robust [whistleblowing procedure](#) which covers both PPS staff and members of the public. Relevant guidance is available on the PPS website. Anonymous reports will of course be investigated, but the preference is always for individuals to come forward so that full details of the incidents reported are available and the Service is in a position to provide feedback.

Accessibility for Making a Complaint

The figures in **Annex 2** show that complaints are received through multiple channels including email (most popular) and the dedicated web portal (second most popular), as well as hand-written or typed letters and phone calls.

Alternative formats are available on request.

The PPS website is easy to navigate and contains full details on how to make a complaint - together with helpful guidance, easy read process maps (which are 'jargon' free) and signposting to other agencies which may assist or help.

Chapter 3:

Complaints Referred to the Independent Assessor

The Position in 2024/25

In this reporting year it is noted that I was contacted by a total of 14 complainants, 13 of whom raised complaints which were **not** accepted for full assessment by me because they were out of scope for example, because they related to purely prosecutorial issues.

One complaint was partially accepted by me as raising a service delivery complaint, but it was withdrawn/not pursued by the complainant following direct engagement with me.

- Upheld/Partially Upheld – 0
- Not Upheld - 0
- Withdrawn/Not Pursued - 1
- Out of Scope - 13

Issues raised in matters which were determined by me as being out of scope included matters such as:

- Dissatisfaction with a prosecution outcome at court.
- Continuing dissatisfaction with the correctness/fairness of decisions not to prosecute.
- Allegations that PPS had not evaluated evidence correctly and had ignored or not obtained evidence.

I noted that this year there was an unusually high number of matters coming to the IAC which were legal and/or policy matters, including reviews under the Code for Prosecutors.

In previous years I have undertaken extensive engagement with the Head of Policy and Information at PPS to examine the possible causes of this. It is noted that many complaints this year were directly submitted to the IAC by complainants, but in effect the complaint process was being used as a mechanism to extend the aggrieved person's line of questioning about a 'no prosecution' decision or a grievance about a case outcome in court.

I have noted that both Stage 1 and Stage 2 responses in 'blended complaints', whilst comprehensive and well explained, had not resolved this problem. Continuing

correspondence adds a significant additional resourcing requirement to an already heavy workload of PPS officials. Persistent contact with the IAC engages time from the IAC in explaining matters which are out of scope.

Last year PPS has focused on how such cases may be better managed, with input from the complaints team, Assistant Directors / Heads of Branch and the IAC. New strategies have been devised, particularly on parallel complaints and the challenge of managing vexatious complaints, unacceptable actions and behaviours.

It is also recognised by PPS leadership that many individuals found the system to be confusing and complex and many complaints were based on a lack of understanding and a perceived imbalance of power, particularly for victims of crime who did not feel adequately represented in a prosecution.

The continuing problem of misconceived complaints referred to the IAC has now risen to its highest level in 6 years. I noted that many of the contacts I received were not in respect of 'blended complaints' but were very clearly only issues relating to a prosecution decision. It is perhaps explained by the PPS data on Requests for Review, which shows that this year produced a record number and the level has increased by 60% over 5 years (321 in 2024/25 compared to 192 in 2020/21).

This evidence may indicate a need for action in terms of the PPS Review process. It would be important to understand the reasons why requests are increasing and why the Review process is generating so much continued contact year on year. This appears to be creating a significant additional work burden.

Reviews are matters outside the complaint process, so I mention it only as a suggested way of best using the evidence from misconceived complaints to assist with any improvement work on the PPS system for managing Reviews. There may be issues about whether the Review process makes it sufficiently clear to people that a Review outcome is final, cannot be appealed or further assessed and that 'no further correspondence' messaging is clear.

IAC Complaint Assessment Outcomes

Not Pursued/Withdrawn/Resolved

The one case which was accepted by me in this reporting year was a very difficult and sensitive matter involving the death of a young man and a complaint about PPS by his family. I was able to separate out staff conduct complaints and a complaint about inadequate communication, from a range of prosecutorial matters which related to the family's view of the adequacy of the charges brought and the approach of the PPS to the complex evidence in the case. After extensive engagement the family recognised

that the complaint process was not able to address their primary concerns, and they had the support of their own legal advisors to consider other options which may be open to them. The family decided not to pursue the service complaints further.

Criminal Justice Inspection Northern Ireland (CJI)

This year I participated in the research by CJI during its inspection of PPS organisational performance. Inspectors were interested in how the PPS complaint process works, my experience of PPS complaint handling, common themes and any challenges I faced when dealing with complaints about PPS.

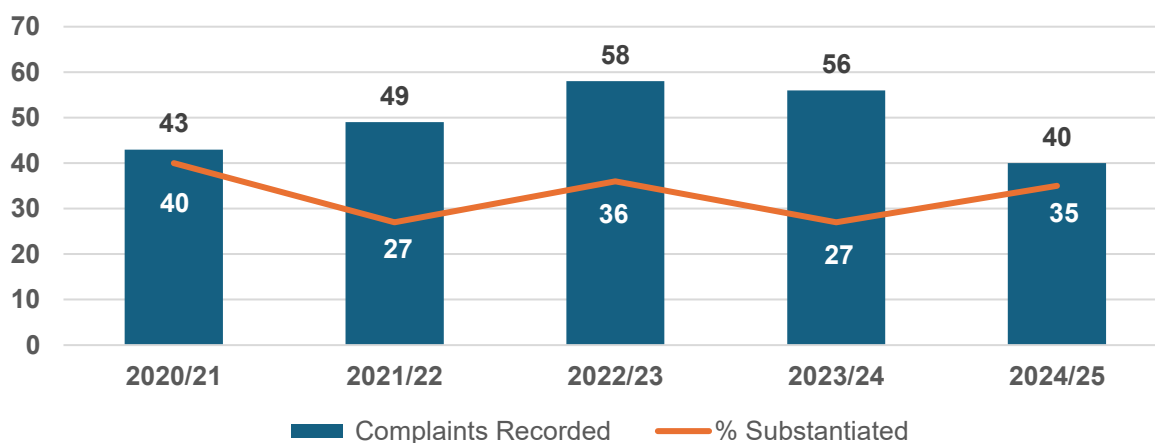
Chapter 4: Performance Audit of Complaint Process

Complaint Numbers and Outcomes

A statistical analysis of the complaints received during 2024/25 is presented in detail at **Annex 1**.

The very clear positive statistic for PPS complaints is that during the reporting period 38,682 files were submitted to the PPS and a total of 40 complaints was received. Therefore only 0.1% of cases resulted in a complaint.

Chart 1: Complaints Logged and Percentage Substantiated 2020/21-2024/25



The total number of complaints received has **significantly reduced and it is at its lowest level** over the 5 years reported in the PPS data set. This is possibly explained by the fact that the total number of files submitted to PPS is some 5,000 lower than last year. However, even taking this into consideration, the proportion of complaints is still significantly lower than is usually expected, based on previous data on total files and total complaints received.

Of the 40 complaints received:

- 10% were resolved by means of early/informal resolution.
- 88% of complaints were resolved at Stage 1 or earlier.
- Of the 12% of complaints not resolved at Stage 1, 80% of those were resolved at Stage 2.

- The IAC did not uphold or partially uphold any complaints.

Some positive findings can be drawn from these statistics:

- Only 0.1% of the total files processed by PPS gave rise to a complaint.
- A huge majority of complaints received were satisfactorily dealt with at Stage 1 or before.
- Only a small number of complaints were not satisfactorily resolved by PPS.

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

- PPS continues to have a low proportion of cases which lead to complaints.
- PPS actively seeks to resolve and concede where possible in its approach to complaints.
- The internal process is effective at resolving the majority of complaints, particularly at the early stage.
- No complaints resulted in a different finding by the IAC.

My findings based on this evidence is that **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 and complaint responses are very successful at resolving the complaint whether it is upheld or not.**

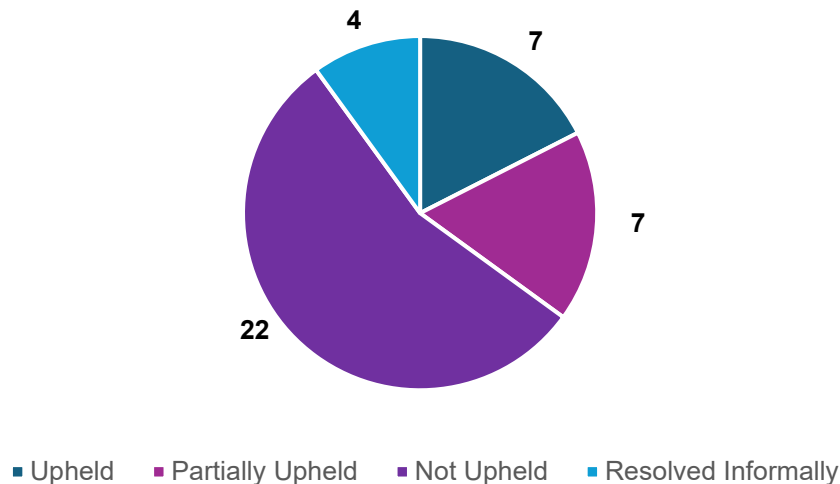
Benefits of Early Concessions and/or Dialogue

The PPS have committed over recent years to improve their approach to direct dialogue and informal resolution to complaints. There has been a very conscious effort at leadership level to encourage this approach. This is evidence of achieving the NIPSO standard of *'Fix it Early'*.

At the outset of this section, I wish to acknowledge and commend the face to face engagement in the very complex complaint that was ultimately referred to the IAC this year, and which involved the tragic death of a young man. The family were very unhappy with PPS case handling and decision-making, but in the face of this, my view is that the direct dialogue and communication by PPS officials was extremely strong, honest and caring under very difficult circumstances. I note that the Senior Assistant Director involved engaged with the family for four hours over two meetings to address the concerns raised. This did not resolve the family's concerns, but it is strong evidence which supports my conclusion that PPS is up for having difficult conversations, actively listening and acting upon negative feedback in an open and honest way.

It is notable that this year saw a significant reduction in the recorded complaint numbers by almost a third from the previous year and is at its lowest level ever when compared to the complaint figures across my 6 year tenure.

Chart 2: Complaint Outcome by Type 2024/25



I also note that the amount of people who felt the need to complain about PPS since 2019 has ranged from the lowest number of 40 (this year) up to a high of 59. Given the significant drop from last year's second highest number of 56, **I am wondering if PPS is in fact capturing all of the impacts of the full range of de-escalation work that staff may be doing without credit. For example, staff may be explaining and engaging with complainants at a very early stage and those matters are not being logged as 'resolved complaints'.**

There has been a noticeable improvement for PPS over the last 3 years in terms of complaints resolved informally before Stage 1. It has been my recurring recommendation to PPS to try and improve this figure, and it has increased gradually year on year to the highest level in the last reporting year and this has been maintained. This is very positive.

However, I would urge PPS to explore whether there is evidence that PPS staff are in fact resolving complaints locally and quickly at source, thus reducing the number of formal complaints brought. I strongly suspect that this could be one of the reasons for the marked reduction in recorded complaints. There could be some very important data that is not being counted and as a consequence, the hard work of staff and an improved organisational culture may not be receiving any acknowledgement. This may be supported by some feedback from an Assistant Director provided to me on the practice of informal resolution:

“A letter can feel impersonal, while a conversation can provide clarity and reassurance. The challenge, of course, is identifying which cases would benefit most from this approach. In some instances where I offered the option of coming in, it became clear they just wanted to air grievances or didn't fully understand the process. I have dealt with a complaint from a police officer over the phone and she was content that the matter was resolved. However, in other cases, particularly where the tone isn't aggressive but rather stems from confusion, these meetings can have a positive impact on the complainant's understanding and well-being.”

I have underlined the part of this quote which suggests that there may be routine practice of immediate resolution of what are essentially 'complaints' but that this may be taken in the stride of busy staff and not in fact reported as a complaint resolved by way of early resolution.

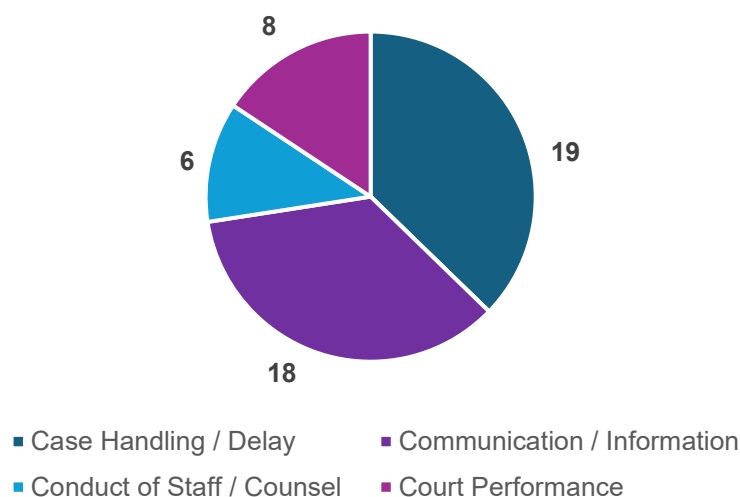
I recommend that PPS engage with staff to ask them to always record conversations which resolve grievances and log this information with the Information Management Team. Staff must take the time to record and report events like this to ensure that these incidents are logged for the record, in this way staff skill and positive culture can be recognised as the levers which are reducing pressure on resourcing and on the formal complaint process.

Complaint Themes

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

- Case handling/Delay.
- Communication/Information .
- Court Performance.

Chart 3: Complaint Themes 2024/25



Delay

Delay has been growing as a recurring theme in PPS complaints. In my audit sampling I also noted several admissions by the PPS in respect of delay. In some cases, this was handled extremely candidly which is exactly how it should be handled:

“I have no hesitation in accepting that it has taken far too long for the decisions to be taken in this case” (extract from Stage 1 complaint response, 27 July 2024).

However, I also noted a complaint that was not conceded when it most definitely should have been fully upheld. In a complaint response dated 16 August 2024, a complaint was not upheld because resources were under severe pressure. The response stated that:

“Legacy cases...had to be prioritised”

and that

“Resource pressures within PPS are well documented in the media”

This is such a disappointing response and an entirely unacceptable finding. I must stress to PPS that it is essential that genuine complaints about unacceptable delay are explained AND upheld. It is not good enough to shift blame to resourcing pressures and dismiss the person’s experience.

Whilst individual staff may feel that these situations are ‘not my fault’, they are responding on behalf of an organisation and it is in fact a failure of PPS when there is unacceptable delay, no matter what the pressures are. Lack of resources is no doubt a cause of lower quality service standards, but this does not mean that those who complain are wrong to voice their legitimate concerns and experiences.

The complainant in this case was extremely distressed by the very long delay in taking a prosecution decision. The complainant stated that the delay and uncertainty had been making her very ill. The delay was conceded as being unusual but because it was ‘beyond control’ the complaint was not upheld. The complainant’s concerns should have been acknowledged and a sincere apology for the delay should have been offered. It should definitely not have been dismissed in this kind of defensive manner.

Communication / Information

Another leading theme for complaints is communication / information. This has consistently been a top theme in complaints over the last five years.

This is not something that only affects PPS. Most public bodies will find the same theme emerging as the most common driver of customer dissatisfaction. The important issue for PPS is to strive for improvement in communication as a major lever to reduce complaints.

Given the marked reduction in complaint numbers this year, it may be the case that communication is in fact improving and reducing the need for service users to complain. It is difficult to measure this to draw a firm conclusion, but PPS could give some thought to the use of focus groups to better understand any positive impact of recent communication improvements and improvements in the provision of information in improving service delivery and reducing the need to complain.

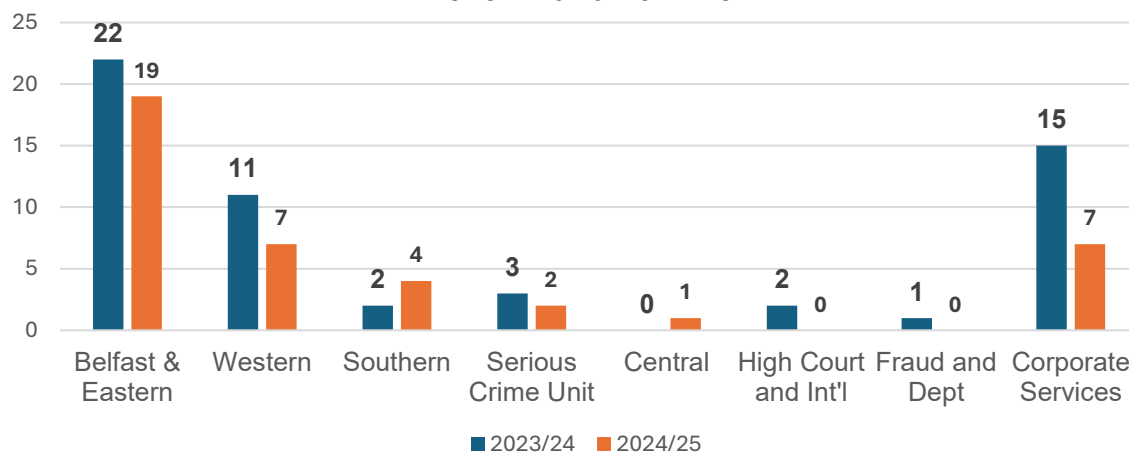
During my audit I found some excellent examples of clear and helpful explanations as well as signposting to other agencies:

- A complaint response contained helpful signposting to the Police Ombudsman with very strong explanations given on the difference between investigation of crime and the PPS role in applying the Test for Prosecution. It also contained good signposting to seeking independent legal advice.
- An excellent, very sympathetic and meaningful complaint response (July 2024):

“As a result of your complaint an internal review is being undertaken in respect of victims’ personal statements and steps will be taken to communicate with other agencies... This is being done to ensure, as far as possible, that this situation does not occur again.”

Complaints by Business Area

**Chart 4: Complaints Logged by Business Area
2023/24 and 2024/25**



Belfast and Eastern Region is where the highest number of complaints originate and, given the amount of business conducted there, this is not surprising or unusual.

The PPS's Complaints Actions and Recommendations Log for 2024/25 demonstrates active data analysis and monitoring of complaints and their outcomes according to business area. There is regular monitoring of emerging risks or unusually high numbers of complaints in a particular business area.

Timeliness

The target for acknowledgement of complaints is 5 working days. All cases, bar one, have been responded to within the 5 day time frame.

The PPS's corporate target is to respond to 80% of complaints in a 30 day window. Performance here is now a cause for concern.

Last year the analysis of this target highlighted 3 areas of concern, the Serious Crime Unit (66%) Corporate Services (73%) and High Court and International (50%). This year, in respect of those particular areas, PPS management should note that SCU has dropped further to 50%. Corporate Services remains at the same level of 73%. The more significant concern is that all departments are showing signs of pressure with Western achieving 57%. Only Central has achieved 100% on this target while Belfast has achieved 84%. **Overall, 27% of complaints were not responded to within 30 days.**

This evidence may suggest that thought should be given to a more feasible target and to enable staff to take the time to provide a full and satisfactory complaint response. Historic achievement of this target has been significantly better than the figures for the last 3 years, most notably for this year. Complaint investigation can be extremely time consuming and challenging for staff already working at or beyond capacity. However, there are other data available which suggests that PPS workloads have reduced in terms of the total files handled. There may therefore be a problem with current organisational capacity. Indeed, I note that there are Stage 1 complaint responses on record which may affirm this, and point to a diminishing ability of PPS staff to manage efficient response times:

“There has been an 11% increase in the number of files that Senior Prosecutors have to deal with in the last year...” (Complaint response 10 December 2004)

It is also notable that these issues affected the IAC Audit Scorecard significantly and had performance been better, the overall IAC audit score would have been significantly higher.

PPS is already looking at ways to reduce the burden of complaint handling on Assistant Directors who are almost always the complaint handlers at Stage 1 and Stage 2. The question for PPS is whether it is sustainable for senior staff to continue in this role. Alternatively, it may be better to remodel the method of internal complaint assessment to raise the likelihood of these targets being fully achieved, or to extend the target to 40 days.

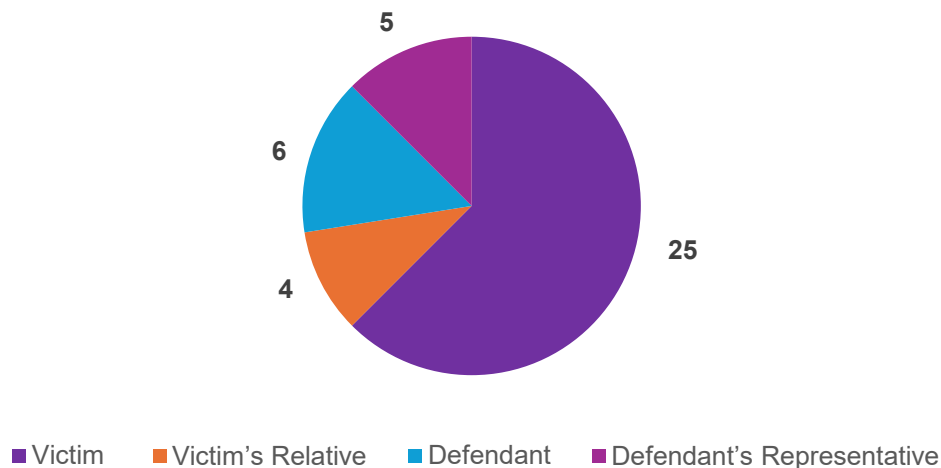
A change in policy may improve both timeliness of disposal of complaints and enable the most efficient use of resources. I made a key recommendation on this issue last year and I have repeated the same recommendation this year in the final chapter of this report

Who Is Complaining?

The most common category of complainant were victims of crime and relatives of victims, which accounts for 72.5% of complaints (broadly similar to last year at 71%).

This is followed by defendants in prosecutions, and their representatives, at 28% of complaints (an increase on last year).

Chart 5: Complaints by Complainant Type



There has been a noticeable increase in the level of complaints by or on behalf of defendants since last year, the majority of these relate to delay in taking prosecution decisions.

It is also noted that there has been a substantial year on year increase in the number of requests for review of prosecution decisions. In 2022/23 there were 267 requests, 250 requests in 2023/24, and this year there were 321. When one compares the figure for 2019/20 (195 requests), this shows a significant area for concern and action as to

what could be the underlying causes of this continual increase in requests for review, even in a year when the total number of files handled has reduced.

Although reviews are outside the remit of the complaint process, the two are closely linked, particularly in capturing the level of dissatisfaction on the part of victims. When looking at these two statistics together, the picture of information may suggest a decline in victim's confidence in PPS decisions and service.

The combined total of victim complaints and requests for review stood at over 300 last year and this year the total is 350. In addition to the conclusions that may be drawn about the root causes of this increase, this evidence also supports the argument that the amount of work created by complaints and reviews may be a burden on current resourcing.

Perspectives of Complainants

Feedback from complainants about their experience of the complaint process is difficult to gather and has had low to zero response rates in past attempts to conduct surveys.

I had previously made a recommendation that PPS should consider stakeholder engagement forums or focus groups to discuss complaints, calling upon frequent service users and victim/witness support groups for specific feedback both negative and positive. I renew this recommendation this year in the final chapter of this report.

What Is their Remedy?

As stated in my opening observations, there is reassurance for service users of 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, the Code for Prosecutors and now its new Complaints Charter.

It is also reassuring to find that in the complaints brought by victims which have been upheld, or partially upheld, firm 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.

Evidence of Putting Things Right

When looking at the Complaint Action and Recommendations Log, I have been impressed by actions taken at the most senior level of the PPS in response to remedying and learning as much as possible from the complaints upheld at Stage 1 and Stage 2 in this reporting year. The following completed actions in response to complaint learning were noted:

- *Unacceptable behaviour at court by Counsel and victim's feelings being undervalued. Apology provided and remedial action undertaken and confidentiality procedures put in place at court.*
- *Internal review of PPS processes within SCU/VWCU on how contact is handled with victims with regards to timeliness of correspondence & sensitive communication used due to nature of cases.*
- *Delay in review. Failure to update on process of review. Apology provided. Internal processes being looked at.*
- *Handling of case & communication standards by PPS. Apology provided for communication breakdown. 'FLO type' role within PPS suggested at PDC to improve communication with victims' families in fatal cases, passed to head of VWCU for further consideration.*
- *PPS need highlighted going forward for enhanced support structures for families & victims.*
- *Communication with PPS staff member, delay in invites for court. Apology offered for delay in invites to court. Invites should be sent when a contest date is set even if there is a doubt over whether the case will actually run. That way they won't be overlooked. Statements of witnesses should not be sent to witnesses in advance of contests and explanations provided as to why we won't do so when we are requested to send these out. Notes of telephone calls should be made and placed on CMS*
- *Failure to apply for a restraining order before sentencing & VPS opportunity not given to victim pre-sentencing. Apology provided for these areas of complaint. Steps being revised to address failures in processes.*
- *Incorrect CMS changes made to victim status by VWCU case officer. Apology provided. Staff addressed on correct processes to be followed.*
- *Handling of communication in case. Apology provided for communication aspect. Staff member addressed by Line Manager on communication failings.*
- *Standard of communication & communication with PPS Staff. Apology provided for standard of communication aspect. Reminder to staff to check wording of letters before being issued.*

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 (CPS) in England and Wales provides for the consideration of such a remedy in certain cases. In the CPS, 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’.

In Northern Ireland, the only further route of remedy for a complainant is often by way of 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. An 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 policy consideration.

Some people I have engaged with think that the limits on challenge to PPS is very unfair and that PPS has too much ‘unchecked power’ and ‘too little operational oversight’. It is often said by victims that Judicial Review is no remedy at all because it is unaffordable for ordinary people. Victims also have the option of contacting the Office of the Commissioner for Victims of Crime, which is becoming more widely known since its creation in 2022.

Chapter 5:

Concluding Observations and Recommendations

Recommendation 1

I note that a key recommendation was made in my report last year:

“PPS should consider the emerging trend of increased complaints and Review requests and the possible impact this has had on achieving its complaint response targets and on staff capacity, and take appropriate action”

Whilst this year saw a record low level of complaints at PPS, and a significant reduction in the total amount of files processed, my analysis of complaint responses at Stage 1 and Stage 2 once again demonstrates the significant time and resourcing that is required to manage complaints which can raise complex issues. The significant year on year increases in Requests for Review must also result in significant resourcing pressure.

In all cases, complaints are thoroughly assessed and very lengthy letters of explanation and reasons for decisions have been given. It is possibly a critical point in time to address the method of complaint handling within PPS to alleviate internal capacity pressures.

I repeat my suggestion of last year that an updated model of complaint handling could include:

- Better use of staff other than ADs to assess complaints at Stage 1.
- Better use of the IAC resource. For example, a new 2 tier complaint assessment model could involve a Stage 1 assessment by PPS staff, but all Stage 2 assessments could go directly to the IAC.
- Extending the complaint response time to manage expectations realistically and improve compliance rate.

These are merely examples and PPS leadership will be best placed to decide on the most appropriate action to take to address the issue.

Recommendation 2

I repeat my recommendation from last year that PPS should establish Focus Groups to capture user experience and gain meaningful feedback about its performance. These groups could be facilitated by an external agency and could include previous

complainants, frequent service users and delivery partners within criminal justice and the third sector.

Recommendation 3

PPS staff training and its recording systems should include mechanisms to support the capturing of data in cases where staff have managed and deescalated a matter which otherwise would have become a complaint.

I suspect that a large amount of data is not captured, and this data would likely demonstrate the work that is being done at the earliest point of engagement with an unhappy service user. Capturing this data would enhance PPS intelligence and enable it to measure the true picture of its commitment to fixing problems early and engaging in informal resolution and direct dialogue.

Final remarks

My overall opinion of the PPS complaint process, having thoroughly reviewed its performance this year, is that the complaint system has consistently performed to a high standard and is a model of good practice in both complaint management and as a tool of continuous improvement. My Audit Scorecard reflects an overall mark of **84%** which is very good, but it certainly could be even better if the complaint handling targets had been met consistently this year. It is the lower score under 'Process and Procedure' which has undermined some excellent scores in other areas.

In terms of organisational performance management, PPS leadership approaches complaints as containing vital intelligence and levers for change as part of its overall quality assurance strategy. That said, there are some areas where practice and standards need to be raised. For example, I was concerned to find a complaint about delay which was not given the recognition it deserved.

The appetite for my recommendations and further improvements in the complaint scheme and the practice of complaint management will of course have to be balanced with other considerations, such as budget, staffing, and working priorities.

PPS has been extremely challenged by impacts of the post-Covid 19 Pandemic period, and the backlog of cases from that period which are still moving through the system. There have also been significant issues with public sector pay disputes and industrial action as well as extreme pressure on public finances in Northern Ireland.

Extreme challenges have been placed on PPS and it is testament to the professionalism of PPS staff that the number of complaints throughout this highly challenging period is at the lowest level on record.

I commend the Director and all his staff teams for their ongoing commitment to working on the front line of our justice system and ensuring that such an important service continues to deliver as it faces these challenges. I am impressed by the evidence which confirms the level and scale of change and improvement to the complaint scheme, the management of complaints, and openness to feedback which I believe has been a contributing factor to the commitment to continuous improvement of organisational culture and performance throughout the organisation.

Using the NIPSO standards and framework to assess the PPS complaint system has been very illuminating again this year.

The NIPSO model of practice anticipates that:

“All organisations will have arrangements (including information and training) in place that make clear to staff the importance of candour, honesty and openness when dealing with and investigating complaints.”

I can fully commend the PPS scheme as complying with NIPSO standards in this context.

NIPSO further states that:

“Guidance for staff should also make clear that the organisation’s approach to complaints is non-defensive and complaints should be received with a willingness to listen to challenge about services and/or service delivery. Staff should be trained and encouraged to build trust with customers who have raised a complaint as an effective way of promoting the organisation’s values.”

Again, I can fully commend the PPS scheme as complying with NIPSO standards in this context.

NIPSO also recommends that:

“Organisations may wish to set out the behaviours they expect from staff when dealing with complaints. This may include a commitment that staff will behave in a professional manner and treat customers with courtesy, respect and dignity.”

As a result of my recommendations, PPS developed and published its own Complaints Standards Charter, which include stated principles and expected PPS behaviours in the handling of complaints. This work is to be commended. The development of this public declaration of PPS standards has further embedded and strengthened the PPS commitment as a learning and reflective organisation.

The PPS complaint management system is not an isolated area of business but an integrated and responsive system which is used by leadership as a strategic enabler of conscious risk management, continuous improvement and quality assurance practice for the whole organisation. For example, PPS is committed to progressing data analysis within its knowledge management system for complaints, which exchanges intelligence through peer to peer reporting and which also identifies patterns and trends over a five year period.

This use of data allows for comparative analysis across business areas, complaint themes and the potential for case studies to be shared which can increase consistency of practice and inform individual approaches. These patterns within the data can be studied, measured, and understood by leadership to enable specific interventions which is designed to reduce or eliminate them.

It may be difficult or impossible to eradicate service complaints, but it is the treatment of complaints which is the critical factor for the confident organisation which is courageous enough to always be open to learning and to treat that learning as a call to action and as a lever for making change.

This culture and practice produces a range of broader benefits such as establishing trust, giving citizens confidence and raising the morale of staff who are not being called to account for mistakes individually but who are being empowered to be collective change makers.

My message to PPS at the end of my six years in this role is to always follow the '3 Cs' when approaching a complaint assessment:

Candour – be open and honest, never defensive.

Concession – find something you can concede in every complaint, even if it's just a small issue and open your communication with it.

Curiosity – always be motivated to learn through seeing things from the user perspective.

It has been a pleasure to work with PPS throughout my time in this role. I hope that my successor finds the role as interesting and valuable as I have done. I have thoroughly enjoyed working with all PPS officials over the years and I greatly admire their commitment to public service in a very challenging job. I have learned so much about the performance of our legal system and the experiences of the community it serves, through the courage of so many complainants over the years who have shared their stories and experiences with me. I wish the Director and all the team at PPS the very best of luck as they continue on the journey of continuous improvement.

Annexes

Annex 1:

Assessment Checklist on PPS Complaint Handling 2024/25 - Six Themes of Good Practice

Six Themes of Good Practice

The six themes are:

1. Organisational Culture.
2. Process and Procedure.
3. Accessibility.
4. Quality.
5. Learning from Complaints.
6. Complaints Handling Performance.

1. Organisational Culture

Crucial to good complaints handling is an underpinning culture that truly values complaints. Creating and embedding that culture needs strong leadership.

This calls for senior management to visibly support good complaints handling and so develop a culture within their organisation that values complaints. A 'valuing complaints' culture means that all staff who come into contact with service users genuinely value those users' views. It also means that service users feel comfortable about expressing their views without fear of this affecting the treatment they receive or their relationship with the service provider.

Where complaints have been identified as relatively straightforward and where a response can be provided quickly, frontline staff should be empowered to deal with the issues raised. Investigative staff should have a clear remit to access any information necessary to effectively investigate more complex issues and reach a robust decision on them. This requires clear direction from senior management on the extent and limits of discretion and responsibilities in resolving complaints, including the ability to identify failings, take effective remedial action and apologise.

Senior management also have a responsibility to ensure that complaints are central to the overall governance of the organisation, and that staff are supported both in handling complaints and where they may be involved in the investigation of a complaint.

2. Process and Procedure

A model of best practice specifies the process and procedure to be followed in handling and responding to complaints.

Complaints should be dealt with under a quick, simple and streamlined process with a strong focus on local, early resolution by empowered and well trained staff.

The model should set out the requirements for, among other things, recordkeeping; monitoring and reporting of performance; and the senior management review of complaints handling to identify any required remedial actions and opportunities for improvement.

3. Accessibility

Clearly, it is important that the complaints procedure can be easily accessed by all service users. Information about complaints should be available at all times, not just when a service user wishes to complain.

Organisations should consider the most effective ways to ensure maximum accessibility, such as placing posters and complaints leaflets in public offices, communal areas and waiting areas. Some service users may not use the term 'complaint'.

All staff should be aware of this and should ensure that any expressions of dissatisfaction fitting the agreed definition of a complaint are handled via the complaint's procedure (and not, for example, as comments, concerns or feedback).

Organisations should take into account needs of customers, making reasonable adjustments as required. They should provide a range of methods for complaining by whatever means is easiest for the complainant to ensure that, as far as possible, individuals are able to make and pursue complaints regardless of accessibility issues.

Where complaints information is published it must be easily accessible to members of the public and available in alternative formats as requested.

4. Quality

An effective complaint handling procedure should provide quality outcomes through robust but proportionate investigation and the use of clear quality standards.

The outcomes of complaints should be analysed to identify and implement service quality improvements. It is vital that the evidence obtained in response to complaints

is of a suitable quality and accuracy to enable a full and informed response to be issued.

The decision letter must include a full response to each issue complained of, be open and not defensive, demonstrate where appropriate the changes made as a result, apologising where appropriate and signpost the customer to the SPSO in every case.

5. Learning from Complaints

The emphasis of effective complaints handling is on early and local resolution of complaints and ensuring that learning is shared and improvements acted upon as soon as possible after the issue that gave rise to the complaint.

Senior management should take an active interest in complaints and review the information gathered on a regular basis. A key role in managing complaints is to ensure that organisational learning from complaints is captured and reported.

Complaints data and learning from complaints should be considered routinely as part of the management information used to monitor performance. Analysis of complaints outcomes will provide a detailed record of services that are not being provided to the service users' satisfaction.

Reviewing this information provides opportunities to improve service delivery, whether in response to highlighted faults or as a proactive measure to increase efficiency and consequently service user satisfaction. Line managers should ensure that the learning gained from complaints outcomes is communicated to all relevant staff.

It is also important to communicate learning externally. The organisation should communicate what it has done in response to complaints, for example, through newsletters, annual reports and on its website.

6. Complaints handling performance

As well as focus on the learning from the outcomes of complaints, it is important that the organisation has a clear focus on its performance in managing and responding to complaints and on how to improve this. Complaints data and information should be used to inform other corporate governance processes, such as risk, audit, quality assurance and legal. Effectively managing performance includes the requirement to check quality standards and timescales are being met, and the requirement for senior management to intervene when management exception reports indicate that remedial action is required

PPS Complaint Audit Scoring:

Yes: 1 point

Sometimes: 0.5 points

No: 0 points

Organisational Culture: Score 95%

1. The organisation can demonstrate evidence of a strong focus on welcoming and responding positively to complaints. **YES**
2. The organisation ensures that all staff are aware of the Complaint Policy and have been trained to handle complaints as appropriate to their role in the organisation. **YES**
3. Leadership actively demonstrates that complaints are valued and staff in senior positions demonstrate a positive complaints culture. **YES**
4. Leaders meet with complainants, during and/or after the complaints process, where appropriate. **YES**
5. Staff at the frontline have (and feel that they have the knowledge, training and skills to respond effectively to complaints. **YES**
6. Staff are empowered to make decisions, and to apologise as appropriate, where complaints are relatively straightforward and service failures are identified. **YES**
7. The organisation supports its staff in fulfilling their complaints handling requirements. **YES**
8. The organisation provides training and/or awareness sessions on complaints handling on at least a three year cycle. **YES**
9. Strategic/operational plans, vision and or mission statements demonstrate that the organisation values complaints. **YES**
10. Complaints feature as a documented agenda item in team, management and senior management team meetings. **YES**
11. The organisation can show evidence of a strong focus on welcoming and responding positively to complaints. **YES**
12. Senior managers have a clearly defined role in relation to signing off individual complaints and in ensuring service failures are remedied and improvements implemented as a result of complaints received. **YES**
13. The organisation ensures that all staff have knowledge of the complaints process, are trained and empowered to deal with complaints and difficult customers and their training needs are reviewed on a regular basis. **YES**
14. Each member of staff dealing with the public has in place a job description/performance agreement/key work objectives or similar document that covers their role/responsibility in handling/managing complaints. **YES**
15. Complainants are thanked for bringing the complaint to the organisation. **YES**
16. Where a problem has occurred, the organisation says sorry. **YES**

17. Where a problem has occurred, quick and effective action is taken to remedy and where appropriate improve services. **SOMETIMES**
18. The organisation always looks to solve the core issue which led to the complaint and learn from the outcome of complaints so as to reduce the potential for more/similar complaints. **YES**
19. The organisation always feeds back to the complainant to confirm that action has been taken and how services have improved. **SOMETIMES**
20. The organisation has a continuous improvement culture and checks customer satisfaction with complaint outcomes and with service delivery. **YES**
21. All staff attend either a complaints awareness session or receive specific complaints handling training within a 3 year cycle. **YES**

Process and Procedure: Score 71%

1. The organisation has developed and implemented a Complaints Handling Procedure which reflects the requirements of the model Complaints Handling Procedure for the sector. **YES**
2. The organisation's Complaint Policy is publicised/communicated to all staff. The Policy is readily available to all staff and they know where to access it if asked. **YES**
3. Staff at all levels are clear on their roles and responsibilities in complaints handling. **YES**
4. The organisation fully complies with the requirements of the Complaint Policy **YES**
5. All complaints and outcomes are recorded in line with the requirements of the model Complaints Handling Procedure. **YES**
6. Complaints are never referred to as unimportant. **YES**
7. Complaints at the Investigation stage are acknowledged within five working days of receipt. **SOMETIMES**
8. Complaints where possible are handled at the frontline / early resolution stage. **SOMETIMES**
9. Complaints investigations are completed with a response being provided within 30 working days wherever possible. **SOMETIMES**
10. The organisation communicates with the complainant when it appears that a response will not be provided within 30 working days. **YES**
11. The rate of premature complaints about the organisation to IAC is low. **YES**
12. Standardised templates are used to acknowledge complaints, to request further information and to communicate the organisation's final response to complaints. **YES**
13. The organisation records the outcome of every complaint it receives in line with the minimum requirements of the Complaint Policy. **YES**
14. The average time in working days to respond to complaints at stage one is on target **NO**

15. The average time in working days to respond to complaints at stage two (investigation) is on target. **NO**
16. The organisation has in place additional management targets for managing complaints, for example in relation to gathering evidence, or requiring responses to enquiries. **NO**
17. The organisation operates a system of exception reports on complaints not meeting the standard 5 or 20 working day timescales. **NO**
18. The organisation always signposts customers to the IAC, no matter the outcome, at the conclusion of the CHP. **YES**
19. The organisation has in place a policy in respect of customers who demonstrate unacceptable behaviour and a procedure explaining how it will apply the requirements of its unacceptable actions policy. **YES**

Accessibility: Score 64%

1. The complaints procedure publicised and made available to customers and members of the public. **YES**
2. The organisation has developed information leaflets or publicity for customers with regards to the complaints procedure and these are in line with the requirements of the Complaint Policy. **YES**
3. Complaints can be made to any member of staff. Customers are not redirected or told to contact someone else. **YES**
4. The organisation actively works with advocacy agencies to promote access to the complaint's procedure, and support for customers where there is a need. **NO**
5. Customers are informed of relevant support services available to them in making their complaint. **SOMETIMES**
6. Complaints guidance is user-friendly, captures specifically the complaint(s) being made and the outcomes expected. **YES**
7. Complaints forms, leaflets, posters etc are always readily available at all public premises. **NO**
8. All complaints are handled in private and staff who have no business need to access customers' complaint information are prevented from doing so. **YES**
9. The organisation has assessed the standards of its complaints handling service against the requirements of the relevant disability and equality legislation. **YES**
10. The organisation advertises access to the complaint's procedure in general correspondence (for example newsletters, communications with victim's groups and stakeholders). **SOMETIMES**
11. The organisation works to raise awareness of the Complaint Process. **NO**

Quality: Score 88%

1. The organisation quality assures complaints responses and ensures that complaints handling meets the standards of service expected by the organisation. **YES**
2. The organisation has a process that provides assurance that the quality of decision making is based wholly on the evidence available. **YES**
3. There is a process in place to ensure that the organisation's response to a complaint addresses all points of the complainant's dissatisfaction. **YES**
4. The organisation can clearly demonstrate it has taken action to understand, from the customer's perspective, the issue(s) complained of and what the complainant would like as an outcome from the complaint; and that its response to the complaint addresses all points of the complainant's dissatisfaction. **YES**
5. The organisation's response to complaints is not defensive: rather it demonstrates that it welcomes complaints and understands the complainant's position. **SOMETIMES**
6. Personal contact is made with the complainant, where appropriate, either through a phone call or meeting. **SOMETIMES**
7. The organisation can demonstrate that it has attempted to resolve the complaint to the complainant's satisfaction where this is possible and appropriate. **YES**
8. The organisation ensures an effective approach to complaints file management. **YES**

Learning from Complaints: 97%

1. The organisation learns from the complaints it handles. **YES**
2. Systems are in place to record, analyse and report on complaints outcomes, trends and actions taken. **YES**
3. The organisation responds to key themes from complaints as identified through its analysis of complaints outcomes. **YES**
4. Where appropriate, remedial action is taken to ensure no reoccurrence of matters leading to a complaint, or to improve service delivery. **YES**
5. Senior managers ensure improvements required as a result of complaints are implemented within the required timescale. **YES**
6. In addition to communicating the decision on the complaint to the customer, the outcome(s) are also fed back to relevant staff. **YES**
7. Learning from complaints outcomes are shared across the organisation **YES**
8. The organisation looks for opportunities to learn from complaints outcomes identified in other organisations and sectors, and shares learning across different service areas. **YES**
9. The organisation analyses complaints information to identify outcomes, trends, themes and patterns and uses this information to inform changes in working practices and service provision and the training provision for staff. **YES**
10. Complaints are discussed at team meetings. **YES**

11. Complaints are discussed at management team meetings. **YES**
12. Customers are advised when service improvements are made as a result of a complaint made by them. **SOMETIMES**
13. The organisation shares complaints outcomes, trends and actions taken. This should be on at least a quarterly basis. **YES**
14. Senior management review the information gathered from complaints and consider whether services could be improved or internal policies and procedures updated. **YES**
15. The organisation can demonstrate that improvements are made to how complaints are handled on the back of monitoring performance. **YES**
16. The organisation has a process to advise senior managers when improvements actions have been implemented or become overdue. **YES**

Complaints handling performance – Score 80%

1. Senior management seeks and is provided with assurance of the complaints handling performance of the organisation. **YES**
2. Performance in handling complaints within the required timescales is actively managed. **NO**
3. The organisation seeks and obtains feedback of customer satisfaction levels on how complaints have been handled. **NO**
4. Staff are aware of how the organisation performs in handling complaints and how they can improve. **YES**
5. Customers are aware of how the organisation performs in handling Complaints e.g. publication of Complaints Audits. **YES**
6. There are checks on open and closed complaints files to gain assurance of compliance with the Complaint Policy, to ensure a clear audit trail of how the complaint has been investigated, to evaluate the quality of assessments and to ensure a consistent approach is taken. **YES**
7. The organisation reports complaints handling performance to its Board/Oversight Authority **YES**
8. The organisation produces evaluation reports detailing performance against performance indicators in for the complaint scheme. **YES**
9. The organisation learns from complaints processes, structures and working practices operated in other organisations and sectors. **YES**
10. Complaints data and information is used at board level to inform other corporate governance processes, such as risk, audit, quality assurance and legal **YES**

Overall PPS Score: 84%

Annex 2:

Complaint Handling in the PPS 2024/25

Table 1: Numbers of Complaints / Requests for Review

Year	Complaints Logged	Requests for Review
2020/21	43	194
2021/22	49	197
2022/23	58	267
2023/24	56	250
2024/25	40	321

Table 2: Outcome of Complaints

Year	Upheld	Partially Upheld	Not Upheld	Resolved Informally	No Further Action Required	Outstanding	Total
2020/21	5	12	24	2	0	0	43
2021/22	7	6	32	4	0	0	49
2022/23	7	14	32	5	0	0	58
2023/24	6	9	36	5	0	0	56
2024/25	7	7	22	4	0	0	40

Table 3: Complaints Substantiated (Partially or Wholly Upheld)

Year	Number of Complaints	% Substantiated
2020/21	43	40
2021/22	49	27
2022/23	58	36
2023/24	56	27
2024/25	40	35

Table 4: Reasons for Complaint

Reason	2023/24	2024/25
Case Handling / Delay	28	19
Primarily Prosecutorial	1	0
Communication / Information	33	18
Conduct of Staff / Counsel	3	6
Court Performance	5	8
Other	1	0
Total	71	51

Note: Several reasons may be recorded for an individual complaint.

Complaints by Region / Section

Table 5: Complaints Received

Year	Belfast	Western	Southern	SCU*	Central	Corporate Services	Total
2024/25	19/40 (48%)	7/40 (17%)	4/40 (10%)	2/40 (5%)	1/40 (3%)	7/40 (17%)	40/40

Table 6: Complaints Substantiated (Partially or Wholly Upheld)

Year	Belfast	Western	Southern	SCU*	Central	Corporate Services	Total
2024/25	6/19 (32%)	3/7 (43%)	1/4 (25%)	2/2 (100%)	0/1 (0%)	1/7 (14%)	13/40 (33%)

Table 7: Complaints Acknowledged within 5 days

Year	Belfast	Western	Southern	SCU*	Central	Corporate Services	Total
2024/25	19/19 (100%)	7/7 (100%)	3/4 (75%)	2/2 (100%)	1/1 (100%)	7/7 (100%)	39/40 (98%)

Table 8: Numbers of Complaints Dealt with within 30 days

Year	Belfast	Western	Southern	SCU*	Central	Corporate Services	Total
2024/25	16/19 (84%)	4/7 (57%)	3/4 (75%)	1/2 (50%)	1/1 (100%)	4/7 (57%)	29/40 (73%)

*Serious Crime Unit

Table 9: Complainant Type 2024/25

Complainant Type	Number
Victim	25
Victim's Relative	4
Victim's Representative	0
Defendant	6
Defendant's Legal Representative	5
Witness	0
Other	0

Table 10: Complainant Type by Region / Section 2024/25

Complainant Type	Belfast & Eastern	Western	Southern	Serious Crime Unit	Central	Corporate Services	Total
Victim	14	4	2	1	0	4	25
Victim's Relative	1	1	1	0	0	1	4
Victim's Representative	0	0	0	0	0	0	0
Defendant	2	1	1	1	0	1	6
Defendant's Representative	2	1	0	0	0	1	4
Witness	0	0	0	0	0	0	0
Other	0	0	0	0	1	0	1

Table 11: Reasons for Complaint by Region / Section 2024/25

Reason	Belfast & Eastern	Western	Southern	Serious Crime Unit	Central	Corporate Services	Total
Communication / Information	7	3	0	2	0	6	18
Staff / Counsel	2	2	0	1	0	1	6
Court Performance	5	1	2	0	0	0	8
Delay / Handling	11	2	3	2	1	0	19
Prosecutorial	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0

Table 12: Reasons for Complaint by Complainant Type 2024/25

Reasons	Victims	Victim's Relatives / Representatives	Witnesses	Defendants	Defendant's Relatives / Representatives	Other	Total
Communication / Information	12	1	0	2	3	0	18
Staff / Counsel	4	2	0	0	0	0	6
Court Performance	4	0	0	3	1	0	8
Delay / Handling	11	2	0	4	2	0	19
Prosecutorial	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0

Table 13: Outcomes by Complainant Type 2024/25

Outcome	Victims	Victim's Relatives / Representatives	Witnesses	Defendants	Defendant's Relatives / Representatives	Other	Total
Upheld	5	0	0	1	1	0	7
Partially Upheld	5	1	0	1	0	0	7
Not Upheld	12	2	0	4	4	0	22
Resolved Informally	3	1	0	0	0	0	4
No Further Action	0	0	0	0	0	0	0
Outstanding	0	0	0	0	0	0	0

Table 14: Method of Complaint 2024/25

Means	Belfast	Western	Southern	Serious Crime Unit	Central	Corporate Services	Total
Email	16	6	4	2	1	6	35
PPS Web Portal	0	0	0	0	0	0	0
Letter	1	1	0	0	0	1	3
Phone	2	0	0	0	0	0	2

Second Tier Complaints

There were **5** files escalated to the second tier. All of the findings at the second tier concurred with the findings of the initial complaint.

One of these was from a Victim, one was from the Victim's family and three were from defendants.

The complaints were from the following areas:

- **Belfast & Eastern - 2**
- **Western - 2**
- **Corporate Services - 1**

Annex 3:

Useful Links

PPS guidance

- [Guidance on the PPS Complaint Policy](#)
- [The Role and Remit of the Independent Assessor](#)
- [PPS Code for Prosecutors](#)
- [PPS Prosecution Quality Standards](#)
- [PPS Victim and Witness Policy](#)

Complaints about other organisations

- [Complaints about the Police Service of Northern Ireland](#)
- [Complaints about the professional conduct of barristers](#)
- [Complaints about the conduct of a solicitor](#)
- [Complaints about the Northern Ireland Courts and Tribunals Service](#)
- [Complaints about the conduct of Judicial Office Holders](#)
- [Complaints about the Northern Ireland Prison Service](#)
- [Complaints about the Probation Service of Northern Ireland](#)

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