

**Inspection of The Office  
of the Police Ombudsman  
for Northern Ireland  
December 2005**

Criminal Justice Inspection  
Northern Ireland  
*A better justice system for all*





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## List of Abbreviations

ATP	Accredited Training Programme for Investigators with the University of Portsmouth
CAUSEWAY	The Causeway Programme is a joint undertaking by criminal justice organisations to improve the administration of criminal justice
CID	Police Criminal Investigation Department
CJI	Criminal Justice Inspection
CJU	Criminal Justice Unit (PSNI)
CO	Complaints Officer
DCU	Police District Command Unit
DPP	Director of Public Prosecutions
DPP's	District Policing Partnerships
EFQM	European Foundation for Quality Management
IIB	PSNI Internal Investigations Branch
IO	Investigating Officer
IPCC	Independent Police Complaints Commission
JEGS	Job Evaluation and Grading Support
JNCC	Joint Negotiating and Consultative Committee
MOU	Memorandum of Understanding
NDPB	Non-Departmental Public Body
NICCY	Northern Ireland Commissioner for Children and Young People
NICEM	Northern Ireland Council for Ethnic Minorities
NIO	The Northern Ireland Office

NIPB	Northern Ireland Policing Board
NIPSA	Northern Ireland Public Service Alliance
NISRA	Northern Ireland Statistics and Research Agency
OPONI	The Office of the Police Ombudsman for Northern Ireland
PPS	Public Prosecution Service
PSNI	The Police Service for Northern Ireland
RUC	Royal Ulster Constabulary
SMT	Senior Management Team
TSG	Police Tactical Support Group

# Chief Inspector's Foreword

*"We cannot emphasise too strongly the importance of the office of Police Ombudsman in the future policing arrangements proposed in this report. The institution is critical to the question of police accountability to the law, to public trust in the police and to the protection of human rights"* - Report of the Independent Commission on Policing for Northern Ireland (the Patten Commission)

1. Policing is of paramount importance in Northern Ireland, and any report on the Office of the Police Ombudsman is liable to attract wide and critical attention. I want, therefore, to preface this report by making clear the nature and limitations of the inspection.

## **CJI's approach**

2. CJI has a duty to inspect the Office of the Police Ombudsman, along with many other organisations in the criminal justice system. With the approval of Ministers CJI has adopted and published an inspection framework which applies to all the inspected organisations. It is based upon the five criteria of:

- Openness and accountability
- Partnership with other agencies in the criminal justice system
- Equality and human rights
- Learning, improvement and the management of change
- Results, including efficiency, effectiveness and value for money

3. The Inspectorate has adopted a consistent approach of working *with* the agencies it inspects with the shared purpose of seeking improvements.

## **The special character of the Police Ombudsman's Office**

4. The Office of the Police Ombudsman for Northern Ireland is in an important respect different from the other agencies that fall within the Inspectorate's remit.

5. The Ombudsman has a quasi-judicial role, which Inspectors had to be careful not to infringe. The concept of 'partnership' with other agencies of the criminal justice system, which is an important aspect of CJI's inspection framework, must be interpreted with care in relation to an organisation for which independence is of the essence. The building of appropriate working relationships is nonetheless essential to the Office's success.

6. Since an Ombudsman is quasi-judicial it would be wrong for CJI to second-guess the Police Ombudsman's decisions in individual cases, and CJI is in any case

specifically prevented by statute from doing so. The inspection therefore had to be conducted in general terms, relating to the criteria above.

### **The political context**

7. No-one who gave evidence questioned that it is right that there should be an independent police complaints body. In terms of its constitution and powers the Office of the Police Ombudsman is widely regarded internationally as a model of its kind. The Office is sensitive here because of the political-historical context and because of the peculiarly difficult subject matter with which it has to deal.

### **Findings**

8. The findings of the inspection are in general positive. Inspectors found that the Office was well and tightly managed. It is misleading to make simple cost comparisons with police complaints authorities elsewhere, since the task in Northern Ireland is different. Because of the history, the Police Ombudsman has to employ her own teams of trained investigators, instead of relying on serving PSNI officers to conduct investigations on her behalf. She also has to investigate historic cases as well as current ones.

9. The Office has worked hard to build confidence both among the public and within the Police Service of Northern Ireland. It has had considerable success with the former, and made some headway with the latter. There is an increasing recognition among the police that the Office is fair and independent and that it does a useful job by exonerating officers who have been unfairly complained against, as well as identifying those guilty of misconduct. There is more to be done, but the survey evidence shows progress in the right direction.

## **'Hard cases'**

10. Inspectors' inability to examine individual cases posed a particular problem. Several sources brought to their attention cases of police officers or former police officers who they considered had been poorly treated. There were complaints that cases had taken too long to resolve and that officers had not been kept properly informed about the progress of the investigation.

11. There are many reasons why delay can occur, not always attributable to the Ombudsman's Office. Sometimes they may relate to legal proceedings pending, sometimes to problems in obtaining documentation and sometimes to difficulties in arranging interviews involving officers, Federation friends and solicitors. Most cases are dealt with within the 90-day target, but there will always be some which take longer to resolve. It is essential that both the Ombudsman's Office and the PSNI keep these long-running cases under review and seek to minimise the human cost of the investigation process, even if the process itself is a correct one.

## **Establishing a sound basis**

12. The good functioning of the criminal justice system will be best served if the work of the Office can be accepted as a normal part of it. It is not helpful for it to be treated as a touchstone of attitudes towards the PSNI. More constructive relations with the Policing Board and others in the police family will be key to making progress with this. All the bodies concerned have a duty to make their best efforts to engage.

13. Some of the partner organizations expressed concern about, as they said, a 'lack of clarity about the remit' of the Office. Inspectors are by no means certain that a lack of clarity about the remit is really the problem but, be that as it may, I recommend that the Ombudsman should take the opportunity of her forthcoming five-year review of the operation of her remit to engage afresh with all the interested parties. I trust that they will respond positively.

## **Accountability**

14. No human institution is infallible, and there is a question what people can do if they disagree with the decisions of the Ombudsman. They can complain to the Secretary of State, but he will only hear the complaint if it relates to maladministration in the administrative functions of the Office. The Ombudsman's decisions on the handling, investigation and outcome of a complaint are final, subject only to the possibility of judicial review. An Ombudsman has effective jurisdiction in his or her proper field.

15. The safeguard against a decision by the Police Ombudsman is that it will fall to another organization – the Public Prosecution Service or the Police Service - to act upon any finding. Decisions will be made either in the Courts or in a police



disciplinary tribunal, from which there is the possibility of appeal to the Secretary of State.

16. Like the Parliamentary Ombudsman the Police Ombudsman has a final line of accountability to Parliament. The Northern Ireland Affairs Committee recently reported on the Office.<sup>1</sup> It would be right that there should in due course be a line of accountability from the Police Ombudsman to the Assembly in Northern Ireland.

### **Acknowledgments**

17. This inspection was led for CJI by William Priestley. The inspection team wishes to acknowledge the assistance that was provided by the Police Ombudsman's Office, particularly Greg Mullan, who acted as Liaison Officer for the inspection. The office put a great deal of hard work into preparing its initial self-assessment, and staff were without exception open and welcoming to the Inspectors.

18. I was greatly assisted in this inspection by the Parliamentary and Health Service Ombudsman, Ann Abraham, who kindly gave time to guide me with an Ombudsman's perspective on the issues and to join me in discussing the inspection's emerging findings with the Police Ombudsman.

19. The Police Ombudsman has responded formally to the recommendations in the report. Her response is attached at Appendix 5.



**Kit Chivers**  
**Chief Inspector of Criminal Justice in Northern Ireland**

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<sup>1</sup> Northern Ireland Affairs Committee fifth report of the 2004-05 session on the functions of OPONI

## Executive summary

Inspectors found many positive elements:

- The staff of OPONI are motivated by the work they do and are enthusiastic about it.
- Staff see their work in the wider context of the normalisation process in Northern Ireland.
- Equality and human rights are given high priority within the organisation and are actively promoted by senior management.
- It is a learning organisation, showing a real commitment to continuous improvement.
- The accredited training programme for investigators (ATP) is now well established and has enhanced the skills and knowledge of investigators.
- There is a comprehensive outreach programme that has yielded positive results with the public and stakeholders.
- OPONI has gained international recognition as the ‘gold standard’ for police complaints systems.
- The senior management team gives a strong lead to the organisation and manages it tightly.

Inspectors’ overall assessment is that OPONI is an effective and efficient organisation, which is keen to improve further. Its task is a unique one and in the current situation devoting around one per cent of the cost of policing to providing a genuinely independent police complaints service cannot be regarded as disproportionate.

In the longer term the numbers employed can be expected to reduce, but for the next few years at least the demand for investigations of old cases will continue to stretch the organisation.

Significant numbers of CID officers expressed a lower level of confidence than other officers in the quality of the investigations conducted by OPONI. Inspectors found no evidence to suggest that the investigations were less than professional, but there is work to be done to dispel these doubts and confirm OPONI’s reputation.

The main issue is the Ombudsman’s relationships with the Policing Board, some (but not all) police officers and the police staff associations. The setting up of the Office was

controversial and the Office has had to defend itself robustly at times, and this has led to a perception that it is intolerant of criticism.

An Ombudsman is not dependent upon the goodwill of those in her jurisdiction, but Inspectors found evidence that current relationships were creating unnecessary friction and in minor ways impeding day-to-day business. Without allocating blame, Inspectors would encourage all parties to work together to establish better mutual understanding.

## Introduction

The Police Ombudsman for Northern Ireland is the independent complaints body established by the Police (Northern Ireland) Act 1998, accountable to Parliament through the Secretary of State and constituted and operated independently of the Policing Board and the Chief Constable. It is a Non Departmental Public Body, (NDPB), financed by grant in aid from the Northern Ireland Office.

Its vision is to

‘strive for excellence in providing an independent impartial police complaints service in which the public and the police have confidence.’

Its stated missions are to:

‘ensure maximum awareness of the police ombudsman complaints service and that it is fully accessible and responsive to the community,

provide a robust and effective investigation process leading to evidence based recommendations and

analyse and research the outcomes of complaints so as to inform and improve the policy and practice of policing.’

Under Section 51(4) of the Police (NI) Act 1998 the Ombudsman is directed to:

“exercise his powers under this Part in such manner and to such extent as appears to him to be best calculated to secure

- the efficiency, effectiveness and independence of the police complaints system; and
- the confidence of the public and of members of the police force in that system.”

## Chapter I External relationships

OPONI is independent of the other criminal justice organisations. The importance of this independence to its proper functioning cannot be over-stated. But whilst the Office operates independently, it cannot operate in isolation. The relationships of OPONI with its key stakeholders are vital to the stated aims and to the statutory obligations of the organisation.

### Openness

- 1.1 In the context of the person of the Ombudsman being defined by the Police (Northern Ireland) Act 1998 as a 'corporation sole', an open approach is important in helping to secure confidence in the independent complaints system. OPONI has a very good external reporting process with key documents available in three languages and publications available in other languages upon request.
- 1.2 The Information Directorate has been proactive in establishing a programme of presentations to schools, community groups, District Policing Partnerships (DPP's) and the PSNI, demonstrating an open organisation with an coherent outreach strategy. The focus of the programme is changed each year and presently the priority is to reach groups identified in section 75 of the Northern Ireland Act.
- 1.3 Of particular note is the programme of presentations given to the Northern Ireland Tenants Action Project, representing 798 separate community groups. This is a very cost effective and efficient way of reaching out to community groups in N.Ireland.
- 1.4 Some presentations are targeted at groups that have demonstrated high usage of the Ombudsman's office, for example, young people. This positive targeted approach could be further developed to focus presentations on sections of the police that attract higher levels of complaints, or where there are known problems of confidence in the OPONI system.
- 1.5 OPONI has a policy of participating in police training. During the past year six out of the twenty-nine Police District Command Units have, so far, received presentations from OPONI during District training events. These are in addition to the presentations given to student officers at the Police Training College, Garnerville. At the time of inspection these presentations had comprised a total of 43 sessions to DCU officers and 50 events with student and other serving officers across a wide range of police functions, including firearms training, public order training, senior investigating officers training and review officers training. A total of over 1800 officers had attended the presentations. Each event is bespoke to the police area so that complaint statistics from the area are used as part of the presentation. It is a credit to the Police Ombudsman that she attends

and presents many of these events, and that presentations have continued despite some hostility being experienced. Many OPONI presenters volunteer for the task, often delivered outside of their normal working hours. A basic evaluation of each presentation is carried out and the results have been broadly positive. It would be useful to analyse the responses to compare the impact on newly recruited officers as against more experienced DCU staff so that adjustments can be made to enhance the effectiveness of the presentations.

- I.6 Police at higher management levels stated that confidence in OPONI investigations within CID remains a cause for concern as compared with confidence levels amongst other officers. Whilst some have attended OPONI presentations through District Training, the numbers of C.I.D officers attending these training events is low. This low confidence amongst the C.I.D has a disproportionate effect on the levels of confidence within the police service as a whole.
- I.7 District training events are probably not the most effective way to reach an audience of C.I.D. officers or other specialist units such as the TSG's. This has been recognised by OPONI and presentations have been given to seven out of eight of the Belfast TSG's. Presentations to other TSG's are planned. A similar approach would be more effective in reaching C.I.D. officers. Police District Commanders now have responsibility for all local training and OPONI should work with them to facilitate a targeted programme of OPONI presentations for C.I.D officers under their command.

## **Recommendation I**

**OPONI as part of its outreach strategy should, with the co-operation of Police District Commanders, establish a programme of targeted presentations specifically designed for C.I.D. officers under their command.**

- I.8 The Information Directorate has also established and maintained very good relations with the media. There is a policy that investigating officers do not speak directly to the media, all such enquiries are addressed through the Information Directorate. This should ensure that all interactions with the media are subject to internal scrutiny to ensure a corporate approach. However, some stakeholders expressed concerns over articles in the press that were seen as critical of the handling of cases by the R.U.C. The articles were described to Inspectors as being, 'unhelpful' and 'not even handed'. The articles in question had been progressed through the Information Directorate but there is no influence over the angle or tone taken by the press in any subsequent reports.
- I.9 The appointment of two Non-Executive members of the audit committee has been a very positive step by OPONI in further developing their open approach and having external 'critical friends'. At present each non-executive member of

the audit committee is engaged by OPONI for a minimum of five days each year. Taking into account their attendance at the quarterly audit committee this leaves only one day each for other activities. In the context of the organisational structure, which has no governing board, further development of the role of non-executive members would benefit OPONI by increasing the amount of external and independent opinion it receives.

## **Recommendation 2**

**To further increase its openness and external scrutiny OPONI should further develop the role of the non-executive members of the Audit Committee.**

### **Relationships with other organisations**

- I.10 Inspectors heard many positive comments about the relationship of OPONI with other organisations. Include Youth expressed the 'utmost confidence' in the work of the Ombudsman whilst other stakeholders pointed to being dealt with, 'courteously and efficiently'. OPONI were 'positive and helpful' in reaching an understanding with NICCY and work is continuing towards agreement and signing of a memorandum of understanding (MOU).
- I.11 Independence is critical to the Ombudsman's role and whilst relationships with the NIO are good, independence has been maintained. Quarterly meetings between the NIO and OPONI report on the many issues that come within the remit of the Accounting Officer including budget expenditure.
- I.12 Oversight of the Ombudsman was considered by Dr Maurice Hayes in his review of the Police Complaints System published in 1997 and endorsed in "The Patten Report" in 1999. Dr Hayes suggested that only complaints of maladministration about the offices' exercise of its administrative functions should be overseen by the Assembly Ombudsman, not any complaints concerning the handling of investigations nor their outcomes. The suggested use of the Assembly Ombudsman in this role has not as yet been possible because policing has not been devolved.
- I.13 The role of an Ombudsman is usually to be the final complaints mechanism, both against the organisation investigated, and themselves. In this context it is important to note that OPONI serves to investigate complaints, not to prosecute or discipline. At the conclusion of an investigation OPONI makes recommendations to the DPP/PPS or to the Chief Constable dependant on whether the case involves possible criminal charges or not. The Police Ombudsman makes directions to the Chief Constable in cases where recommendations that are required to be made in law have been disregarded. If someone believes that OPONI has acted improperly during investigations, or in the discharge of its functions, there is recourse to judicial review. Whilst some

stakeholders do not see this arrangement as particularly user friendly, it is an important mechanism in maintaining the independence of the Ombudsman's office.

- I.14 In cases of complaints of maladministration against the Ombudsman about the offices' exercise of its administrative functions the initial complaint is made to OPONI. If the complainant is dissatisfied they can then refer the matter to the Secretary of State who can appoint an independent investigator. This process is communicated to complainants by means of a leaflet at the time of initial contact with OPONI by prospective complainants. However, complaints not involving maladministration about the Ombudsman's handling, investigation and outcome of a case are entirely matters for the independent office of OPONI.
- I.15 Eligible maladministration complaints against OPONI in the exercise of her administrative functions which have not been satisfactorily resolved with her office will be considered by Ministers. The Northern Ireland Affairs Committee recommended that this system be given time to 'bed down'. Since that recommendation was published in February 2005, there has been just one complaint of maladministration. This complaint was considered by the Minister and was not upheld.
- I.16 At higher management levels within the PSNI there is a recognition that OPONI is keen to build good working relationships. There has been an improvement in relations between the police and OPONI to a point of being described to Inspectors by some senior officers as 'a very good working relationship'. The interaction between IIB and OPONI is described as 'professional, learning and open'. Investigators from OPONI have attended joint 'review officers training' with the PSNI, delivered by an external organisation. At present there is an investigation of police searches of domestic residences in which the police are assisting OPONI. These types of joint projects serve to cement the professional relationship that is required to enable OPONI to effectively and fully discharge its functions.
- I.17 The provision by OPONI of draft policy and practice investigation reports and draft public statements on high profile investigations for factual accuracy checking prior to publication and the prior notification of relevant press releases is seen as very positive by stakeholder organisations. Inspectors were told by one stakeholder organisation that the timely supply of draft reports has improved but that there had previously been an occasion during 2004, when a report had been supplied too close to the final publication date and without any prior knowledge of its content to allow for thorough checking and informed comment. Inspectors recognise that there are many matters to consider when preparing for the publication of reports. However, it would be useful if OPONI continued its recent timely supply of draft reports to stakeholders so that all reports have the benefit of considered feedback.



- I.18 Publications of investigations into complaints have not always included reference to subsequent development (if any) of police policy and practice since the time of the complaint. It can be argued that this is not the role of the Ombudsman, and that the report should solely be concerned with the matters pertaining to the investigation of the complaint. However, where an incident under investigation has resulted in a change of police policy or practice, it should be possible to include a review of these changes, and publish this alongside the results of the investigation, without detracting from the importance or gravity of the complaint under investigation. This would provide current, relevant information to the complainant and the wider public on the prevailing position of police policy relating to the matter investigated. This type of information has been included alongside some reports at the time of their publication. If all the relevant information is not available at the time of publication it would be useful to indicate whether the police have accepted any recommendations made by OPONI or have planned changes to policy or working practices. The separate subject of investigation of police policy and practice is explored further at paragraph I.29.
- I.19 OPONI holds six-weekly meetings with The Police Federation and this is a useful forum. The relationship with the Police Federation was described to Inspectors as “robust but good”, whilst that with the Superintendents’ Association was described as “challenging.” The Police Federation are keen to maintain this contact and regards the meeting as an opportunity to usefully raise issues with the Ombudsman. A liaison officer for contact with the Police Staff Organisations has been appointed by OPONI and once again, this is a positive step in continuing improvement of relationships with police organisations. These initiatives, however challenging for all participants, should continue so that opportunities for developing good working relationships are not lost. All parties to these meetings have responsibilities to ensure that no opportunity to build trust is lost.
- I.20 OPONI and the PSNI have worked together to establish protocols, for example, concerning the naming or identifying of officers in public documents together with the provision of draft material to those officers. Naming of officers in public reports is the subject of legislative provision in s. 63 Police(NI) Act 1998. Protocols and memorandum of understanding are in place or being developed with other stakeholders. This continuing work is an example of the positive steps being taken by OPONI to develop appropriate relationships with other Criminal Justice organisations and staff representative bodies.
- I.21 Despite the improvement in relationships with the police and the many protocols that are in place with them and other stakeholder organisations, there are some difficulties, especially in relationships with members of the police family of organisations (PSNI, Policing Board, Police Staff Associations).

- I.22 The difficulties are manifest in many ways which were evident during the inspection process, for example, delays with the police response to requirements made for information from them, confidence within the PSNI, particularly amongst C.I.D., in the quality of investigations, as well as difficulties in relationships with police staff associations and retired police officers associations, and limited engagement with the Policing Board.
- I.23 Apart from the obvious impact on the efficient progress of investigations, delay in obtaining information from the police results in Ombudsman investigators 'chasing up' the requirements, which in turn affects the relationship at the every-day, tactical level, between OPONI investigators and the police. At senior level within OPONI these difficulties are recognised: "we need to communicate more effectively, both internally and externally"; "there is a lot of work to be done to improve police confidence in the system." Responsibility for reducing delay rests with the police as well as OPONI.
- I.24 Inspectors were informed that many of the delays are as a result of the time taken by police CJU's to supply requested documentation. An OPONI 'timelines exercise' published in March 2005 suggests that this is the problem in over a quarter of cases. To improve the efficiency of OPONI with regard to the investigation of complaints it would be useful to develop a protocol with the PSNI concerning the timely supply of documentation from CJU's. Although police have a statutory obligation to provide the required information Inspectors believe that a protocol or MOU identifying the time frame within which information is to be provided would facilitate the process. Inspectors believe that this particular problem is illustrative of the fact that more work is required by both OPONI and the PSNI to build relationships and trust at the level of CJU managers and staff (police Inspectors and sergeants).
- I.25 The Northern Ireland Affairs Committee in its fifth report of the 2004-05 session on the functions of OPONI stated that:

"The relationship between the NIPB and the Office could be improved. These bodies need to take steps to ensure that their working relationship is fully satisfactory at all levels."

Inspectors endorse that statement. Despite efforts by the Police Ombudsman to secure more regular meetings OPONI meets only once annually with the full Policing Board and further work needs to be done to improve this relationship. This meeting is the only direct opportunity that the elected representatives sitting on the Policing Board have to engage collectively with OPONI. One meeting a year is not enough contact time to improve relationships, especially in the face of such difficulties as the perceived negativity towards the Police Ombudsman by some of the elected representatives on the Policing Board. There should be more regular meetings between OPONI and the full Policing Board in an effort to improve relationships.

- I.26 Police staff and retired officers' associations told Inspectors of their difficulties with the handling of investigations by OPONI. Examples were given of allegedly 'insensitive' approaches by OPONI investigators. Organisations quoted legislation to Inspectors in support of their interpretation of what OPONI should or should not be doing, whilst the same legislation was quoted by staff of OPONI when explaining the extent of their remit to Inspectors. It is apparent that there are differing interpretations of that legislation by some members of the PSNI and by some retired police officers, and this is contributing to difficulties in relationships with these stakeholders.
- I.27 CJINI recognises that the relationship between the investigating body and organisations whose members are being investigated is never going to be an easy one, and that much work has already been done to develop a good working relationship at higher management levels between OPONI and the PSNI as well as with the police staff associations. However, Inspectors believe that this is an area of such importance that addressing it should remain a priority.
- I.28 Whether or not differing interpretations of the legislation are at the heart of the problem (which is not certain) discussions aimed at establishing a shared understanding of how the Ombudsman operates within her remit may dispel misconceptions and be a useful way of developing better relationships more generally. Under the founding legislation the Ombudsman is due to conduct a five-year review of the operation of legislation concerning the discharge of her functions this Autumn, and that will provide an opportunity for taking this forward.

### **Recommendation 3**

**The Ombudsman should take the opportunity of the forthcoming five-year review of the operation of legislation concerning the discharge of her functions to engage afresh with all the interested parties to establish better understandings about respective roles, objectives and methods of operation.**

- I.29 The extension of the powers of the Ombudsman to investigate and report on current police policy or practice is clearly set out in s 60A of the Police (Northern Ireland) Act 1998 (inserted by the Police (Northern Ireland) Act 2003). The powers enable OPONI to investigate matters of police policy and practice that have come to the attention of the Ombudsman if she believes that it is in the public interest to do so. These types of investigations will help to develop and inform police policy and practice.
- I.30 Quality assurance of policy and practice is carried out in England and Wales by many police forces themselves, for example through their own internal quality assurance teams. These teams have clearly established remits and clear reporting lines within their own forces to carry out quality assurance of the

operation of police policy and practice. Quality assurance research conducted by OPONI into these matters would be enhanced if clear protocols were in place regarding the notification of such exercises and the handling of material whilst retaining the independence of OPONI in these matters.

#### **Recommendation 4**

**OPONI should establish clear protocols with the police as to the notification of quality assurance research into police policy and practice. These should include a framework for developing these types of approaches.**

## Chapter 2 Customer focus

Who are the customers of the Ombudsman's Office? The arrangements for the independent investigation of complaints against the police are part of the wider reform agenda in Northern Ireland. The widest interpretation of 'customer', then, would be the whole of the population of Northern Ireland, because the reforms in policing arrangements are aimed at securing a police service that has the confidence of all of the public. 'Customers' can, however, be broken down into the *direct* customers of OPONI, people making complaints and other directly involved parties, and the *indirect* customers, the rest of the population, who benefit from the services of OPONI in securing a system of policing that enjoys public confidence.

- 2.1 The organisation is very customer-focused. Complainants are able to make reports to the Ombudsman in a variety of ways, in person, by telephone or in writing. Complaints officers and investigators will visit complainants in their homes if necessary and there is the provision of an on-line complaints form. Vulnerable complainants have been interviewed in the premises of support organisations. All of these measures indicate an organisation that is committed to delivering an effective service to its customers in whatever circumstances.
- 2.2 Power is given to the Ombudsman by Section 55(6) of The Police (Northern Ireland) Act 1998, to call herself in to conduct investigations, even where a complaint has not been made, in circumstances where it appears to her that a member of the police force may have committed a criminal offence, or behaved in a way which would justify disciplinary proceedings. This is an important element of the work of OPONI and serves the wider public interest in having a fully accountable police service. The Ombudsman has used this power on occasion, demonstrating the customer focused nature of the organisation.
- 2.3 Inspectors found that there is an awareness in OPONI that the closure letter sent to complainants at the conclusion of investigation does not always adequately satisfy customer requirements. It can be too bureaucratic in nature and at times does not explain in sufficient detail the reasons for closure. Improvements in satisfaction levels even where the decision is not what the complainant would have wished, are possible through the development of a more customer focused system of closure. Closure could be by personal telephone contact followed up by a letter setting out the detail. The option of personal contact by telephone would at least make available a system whereby complainants can clarify their understanding of the reasons for closure. It would be useful if OPONI were to review its closure system for complaints and introduce a more user friendly service with the option of personal explanation of the reasons for closure.
- 2.4 The supply of monthly complaints statistics to Police District Commanders has been successful and allows for the good management of trends in complaints at a local level. Officers attracting three complaints or more in a period of a year are

identified through analysis of complaints by OPONI and forwarded to the PSNI. The statistics have proved useful to commanders in managing officers who are receiving above average numbers of complaints. Statistics are supplied to the police through their own internal complaints unit, IIB, and these are then disseminated to local district commanders.

## **Equality in service provision**

- 2.5 OPONI surveys the community background of complainants and publishes this data in its annual report. The numbers of complainants from a Protestant community background are around ten percent higher than from a Catholic community background (appendix 3, figure 10) a figure that reflects current demographics. Most complainants are males. Eighty-one percent of Catholics and seventy-four percent of Protestants thought that OPONI conducted their investigations impartially (appendix 3, figure 8). Figures were higher amongst both communities when asked if they thought that OPONI would help the police do a good job (appendix 3, figure 9). These figures and the fact that percentages have been increasing since inception indicate the effort that OPONI has put in to securing the confidence of the public in the complaints system. In the space of little over four and a half years this is a very creditable performance.
- 2.6 Accessibility of the Ombudsman's office across the province was raised by others with the Chief Executive and was commented upon in a report published in 2003 by the Institute for Conflict Research 'Policing, Accountability and Young People.' Whilst the provision of regional offices would probably be desirable in promoting the police complaints system outside of the Belfast area, Inspectors found that there was no significant evidence that accessibility was being affected by being located only in Belfast. The wide range of options open to people who wish to lodge a complaint appears to offset the effect of the location of the offices. OPONI is a relatively small organisation and the opening of permanent regional centres would more than likely be excessively draining on an already very busy office.
- 2.7 Whilst recorded figures are low, complaints made by members of black and minority ethnic groups about the police are important elements of the community focus of OPONI. As previously stated, OPONI's outreach programme is to be concentrated on groups identified under the nine headings of Section 75 of the Northern Ireland Act, and NICEM was involved with OPONI during its initial stages in delivering cultural awareness training, so plainly, work in this area is already being done. However, the provision of information leaflets translated into the main ethnic minority languages used in Northern Ireland, for use by organisations such as NICEM would be a positive step in promoting the services offered by OPONI to people who have a different first language. It would be useful if OPONI were to continue to engage with such organisations to gauge the demand for leaflets in specific languages.

## Learning from Stakeholders

- 2.8 OPONI is a learning organisation. It conducts regular surveys on its performance against targets and places great emphasis in learning from their analysis. It also commissions studies into areas affecting its work, sometimes in partnership with stakeholders. For example, the work carried out on young people by the Institute for Conflict Research (ICR) funded jointly by OPONI and the Policing Board. There is current research in partnership with the Policing Board into views on policing amongst other minority groups such as gay, lesbian and bisexual people and people from a minority ethnic background.
- 2.9 Feedback from stakeholders and other organisations has been acted upon by OPONI, with many stakeholders stating that they had seen an improvement in response to their needs in the last year to 14 months. OPONI has had meetings with stakeholders to accurately determine their needs and has acted upon these findings. The Policy and Practice Directorate and Information Directorate has had a positive influence on the perception that stakeholders have of OPONI. There has been consultation from both directorates with DPP's and other stakeholders and the current general perception is one of a listening organisation prepared to meet needs where possible.
- 2.10 Some stakeholders have perceived OPONI's response to criticism as being over-robust. Whilst this response may often have been justified it can have a negative impact on relationships. Some stakeholders have also perceived defensiveness towards previous recommendations made as a result of research carried out into the interface with young people. Any perceived unnecessarily defensive response could damage the good outreach work being done by OPONI.
- 2.11 The interface of OPONI with young people is regarded by some stakeholders as "not particularly child friendly". The outreach work already being done with young people was described to Inspectors as being focused on "one-off events." OPONI has jointly arranged youth conferences with the Youth Council, Policing Board and PSNI, made school visits and engaged with youth organisations, despite these efforts Inspectors were told that, "there needs to be more activity in the day to day operations of the office to reach marginalised young people". The Institute for Conflict Research publication, *Policing, Accountability and Young People* recommended that, "An advisory group of young people should be convened to advise on how the Police Ombudsman's Office might make their information and services more accessible to young people." Inspectors believe that OPONI should learn from the feedback and recommendations offered to them in respect of young people so as to promote their services more widely to that section of the population.
- 2.12 It is positive and encouraging that the forthcoming OPONI outreach work is to concentrate on minority groups. Engagement with the police complaints system by people from diverse backgrounds is an important element in promoting

confidence within all sections of the community. Outreach work of this nature should go further than presentations and should aim to give people from minority groups a voice in how OPONI engages with them. Whilst there are opportunities during OPONI presentations for minority groups to participate actively, the process could be developed and extended.

- 2.13 Other NDPBs have made use of advisory groups to give them the crucial community and stakeholder perspective on their work. Such consultative groups can act as 'critical friends', on a range of strategic issues and policy development. Any such group must be fully representative and inclusive, and should be subject to a tenure of appointment so as to maintain the independent and critical nature of the relationship. People who previously have had little input into the Criminal Justice Institutions, such as young people, should be included in any consultative group.

### **Recommendation 5**

**OPONI should appoint an independent community consultative group to provide a structured method of securing the community and stakeholder perspective on its work.**

### **Reporting to the community**

- 2.14 OPONI achieves all its statutory obligations in reporting its activities to the public. An annual report is published each year and made available through the website. In addition OPONI has previously published a summary of its annual report as a supplement in the Belfast Telegraph and has used its website to publish many other reports. Key reports are published in the three main local languages and all reports are available in other languages on request. Reports are also available in braille and information leaflets are available for those people with impaired visual ability. Providing answers to parliamentary questions is the responsibility of the Chief Executive and to date over sixty such answers have been provided. It would be a useful additional method of reporting to the community if answers to parliamentary questions were published to the OPONI internet as well as to the staff intranet.
- 2.15 As part of its strategy of reporting to the community OPONI engages with Community representatives on a regular basis and there is extensive liaison with the media through the Information Directorate. Presentations on the work of OPONI have been delivered to all of the District Policing Partnerships. OPONI website was redesigned and relaunched in January 2004 and this has led to an increase in the number of people accessing it for information. The site is hosted by external IT consultants and visits to the site are monitored regularly. There were over 16,000 occasions when documents were downloaded from the site between April and December 2004.



## Chapter 3 Internal relationships

Relationships within the organisation are generally good. A wide range of methods of consultation with staff are used, for example, through JNCC meetings, staff surveys and away day events. Whilst staff recognise that members of SMT are busy people, most see them as accessible. The structure of the building is such that directorates usually operate on one floor only and this has played a part in limiting communication between directorates. Although there are gathering areas for staff on each floor, there is no communal area for the office as a whole that could help to facilitate communication.

### Communication:

- 3.1 Whilst it is recognised that there is a necessity for some parts of the organisation to operate separately from others, for example, the intelligence unit, some departments and directorates are not operating as closely as they could with others. OPONI has made great effort to ensure good communication across the directorates and this is happening at a senior level. However, links between directorates at more junior levels are not as strong.
- 3.2 There is some inconsistency of approach across the investigation teams with regard to file preparation as well as internal processes such as appraisals. For example, Inspectors found that one team was not aware that another was preparing short format files for misconduct complaints and that this system was being run as a pilot. Also, the appraisal process has been operating differently in some of the investigative teams. This is commented on further at paragraph 4.15.
- 3.3 SIO's attend monthly tasking and co-ordinating meetings where strategic matters are discussed and the regular monthly finance meeting was described as being 'very useful.' However some planned weekly team meetings are occurring only bi-monthly due to pressure of work.
- 3.4 Inspectors were told of one example where only two team meetings had been held during the preceding six months and Inspectors were told that, "this is not enough to make sure we all know what is going on". Investigative team meetings are often used to discuss case progress with little time being given over to organisational matters. Inspectors found that there was no formal mechanism for sharing information across the teams and were told that, "lessons learned seemed to be kept within the teams." There is a training morning held once a month dealing with issues chosen by staff anonymously, however this was not seen by staff as meeting the need for the sharing of information.
- 3.5 A senior member of OPONI said that communication of SMT decisions is done on a "need to know basis and to specific teams in terms of the effect on their own work plans and targets." SMT minutes are not posted on the intranet. This occurred once in the past and it seems that agreement was reached to post the

minutes on the staff intranet. However, these are now not available on the intranet and no more recent SMT minutes have been published on it. Where possible the publication of minutes of meetings, for example, SMT and JNCC, on the intranet would be useful to staff and may help to improve internal communications. In general, staff see SMT as 'very approachable, accessible and interested in their staff.'

- 3.6 Although communication within teams was seen as being good, communicating changes of structures in the organisation has on occasion been seen as being done too late. For example, some grades were told they were moving team only a week before the event. This led to feelings of being kept 'in the dark' and to perceptions that communication across the organisation was not as it should be.
- 3.7 The intranet is used to good effect to publish the OPONI Complaints manual and Investigations manual and this is seen by staff as very useful and easily accessible. Also available on the intranet are the OPONI staff policies documents and a comprehensive press clippings database as well as provision for staff events and news. There is evidence that these facilities are accessed regularly by staff. At the time of the inspection Inspectors were told that there was no 'page counter' for the intranet site although there was strong anecdotal evidence of the facility being used extensively. It would be useful if a page counter system was implemented so that usage of the staff intranet could be monitored and adjustments made to information as appropriate.
- 3.8 Whilst the intranet and e-mail systems are convenient, and often effective media, staff were concerned that communication had become too reliant on electronic systems. In particular, organisational policies were being communicated by the e-mail system. There is a strong case for explaining policies at team meetings to re-inforce staff understanding of them and to enhance deployment, as well as giving staff another opportunity to voice any concerns. During this inspection work was on-going to finalise a Communications policy before being referred to SMT.

## **Recommendation 6**

**OPONI should continue to review its internal communications policy and develop the strategy to enable the effective dissemination of information throughout the organisation. This should include a framework of meetings at all levels with 'organisational information' as a standing agenda item.**

## **Learning from Staff**

- 3.9 OPONI has gathered the views of its staff through various team and office wide events. A recent event for all staff was facilitated by outside trainers and designed to be fully inclusive of all staff within OPONI following a consultation

process that included designing an appropriate format. The approach of the facilitators was to feed back the discussions of the groups themselves to senior management therefore preserving anonymity and encouraging wide participation and this drew praise from attendees. Many strong views were expressed, recorded, and are being acted upon. This is a very positive step, however, some staff at C and D grades saw the event as being focused on higher grades and on investigative staff. They saw their own contributions as being minimal. It is difficult in any event such as this to cater for the needs of all, especially when the audience is mixed in terms of seniority and role, but a review of its effectiveness may aid the development of future away days.

### **Recommendation 7**

**OPONI should gather the views of all staff prior to any future planned away days. It should also review the methodology employed in the last staff away days so that in future such events the methodology used encourages all staff, but in particular those at C and D grades, to contribute their feelings freely.**

- 3.10 Internally, a comprehensive staff cultural survey was carried out in the summer of 2004 and this is a very positive step by the organisation to aid internal communication and learn from its own people. However, many staff interviewed by Inspectors were unaware of its findings or any actions arising from it, despite it being published in full on the staff intranet. This observation is an example of the reliance of the organisation on the intranet as a means of internal communication commented upon at paragraph 3.8 above. The results of the cultural survey is a large document that is not immediately attractive to read, therefore some extra effort is required to promote it to staff. The survey is a positive step by OPONI towards communicating with and understanding its staff and should be repeated on a regular basis so that staff trends can be monitored.

### **Recommendation 8**

**OPONI should take positive action to inform their staff of the findings of and actions arising from, the corporate cultural survey by extracting the executive summary of the document and circulating this to all staff whilst drawing their attention to the full report on the staff intranet. The corporate cultural survey should be made an annual event so that trends can be detected.**

### **Use of seconded officers**

- 3.11 Around a quarter of the staff of OPONI have some sort of police background, including police service outside the UK. During its first year of operation the office had six seconded police staff in the Directorate of Investigations rising to a total of twenty-one during the second year of operation. This number had fallen

to fourteen at the time of the inspection and there is an organisational aspiration to move towards less reliance on seconded staff. There is support within OPONI for maintaining a level of seconded officers to carry out the investigation of complex and specialist cases as well as influencing positively the credibility and quality of investigations. However, maintaining levels of seconded officers is becoming difficult as their home forces become more reluctant to release them. A general trawl of all police forces is issued when vacancies arise for seconded staff.

- 3.12 Seconded officers are on better pay and conditions than their directly recruited colleagues performing the same function, which is a point of contention. The terms and conditions of seconded officers are set by the Home Office and cannot be varied by the Police Ombudsman. The pay differential between a seconded officer and a direct employee doing the same job can be significant. However, this must be balanced against the benefit that seconded officers bring to OPONI. It was obvious to Inspectors that despite the issues over pay and conditions seconded officers are generally well regarded for their skills and experience by their directly employed colleagues.
- 3.13 Whilst directly recruited investigators are further developing their own skills and gaining operational experience seconded officers will continue to be a valuable resource. In the long term OPONI will be able to move to a position of less reliance on seconded officers whilst maintaining the effectiveness, quality and credibility of its investigations. In its Corporate Plan of 2002 – 2005 one of the strategic goals was, “to recruit and develop qualified investigation staff within the office so as to decrease dependence on seconded police officers.” A target of having 75% of investigative staff directly recruited was set. It would however, be of benefit to the directly recruited staff if the intention to reduce the reliance on seconded officers was re-stated, and long-term targets to achieve this were set – recognising, of course, that HR management has to respond to constantly changing demands year by year. Inspectors believe that this may help to alleviate any tensions over differentials in pay and conditions.

## **Recommendation 9**

**OPONI should re-state its commitment to reducing the numbers of seconded police officers. Long-term targets should be set, recognising that management will always have to respond to changing demands year by year.**

- 3.14 A pay working group has been formed and benchmarking against other criminal justice organisations indicated that remuneration was generally lower within the OPONI with some other organisations benefitting from higher starting points within the grades. The perception of the status of investigators is low as compared with the people they are investigating. OPONI investigators hold the equivalent grade to a police inspector in terms of responsibilities but are paid

much less. An evaluation of a range of posts was carried out both by external consultants and internal management over an eighteen month period utilising job analysis techniques and the JEGS grading system.

- 3.15 OPONI is limited as to remuneration of employees so must look to other ways to provide incentives and increase the standing of all its staff. Most investigators are now enrolled on the accredited training programme with the University of Portsmouth (ATP), see paragraph 4.15, and this should aid with the perception of their status both internally and externally. There are numerous opportunities for OPONI staff to attend relevant training and this is seen by employees as very positive, "There are good training and development opportunities for direct employees within OPONI."
- 3.16 Staff have on occasion 'acted up' to the next grade which gives people the opportunity to develop their skill internally. These cases are processed by HR in conjunction with management and the SMT – needs or vacancies are assessed in terms of skill and experience and there are examples of acting up positions being shared amongst staff to ensure that the development opportunity afforded was open to all. There have also been temporary promotions for those engaged in specialist projects although this has resulted in anomalies such as being managed by someone of the same grade.

### **Staff-management relations**

- 3.17 There are quarterly JNCC meetings that are seen as useful and challenging. Two unions are represented within OPONI. The largest union is NIPSA and any negotiations with the NIO over pay are handled by this union. The investigative staff are mainly represented by UNISON. The working relationship between staff representatives and management was described to Inspectors as "healthy." The operation of an internal promotion policy has been seen as inconsistent, however, this policy has been reviewed and was due to end in June 2005. A pay working group that is a sub-group of the JNCC was established to review starting pay, pay on promotion and overlapping grades, and many staff regarded the handling of negotiations on staff conditions by the Chief Executive as open, fair and transparent.
- 3.18 Staff are flexible, for example, there are four investigative teams. Two of these deal with core volume complaints whilst the other two deal with more specialised areas. At times of high volume of core business, staff from the two specialist teams have provided cover enabling the efficient investigation of a high volume of complaints or of personnel intensive complex complaints. There is also a lateral transfer policy operating within OPONI that staff see as a positive step towards enabling personal development.
- 3.19 Inspectors found that amongst the senior management of OPONI there is respect for their staff and the work that they do. One director said, "The

brightest young people I have ever worked with are in OPONI.” However, there was some feeling amongst staff that the pressures on investigators were not fully appreciated by senior management, and that management was sometimes over-critical. Inspectors found that many staff identified two distinct cultures within OPONI, a police culture and a civil service one, with the police culture reflecting a more hierarchical style of management.

- 3.20 That being said, the overall view amongst staff is that there is a good working environment within OPONI. Line managers are described as “approachable” whilst there was generally good access to senior management “despite their being located on the fourth floor.” Whilst staff recognised contrasting styles among the senior managers Inspectors were told that the senior management team worked together well under the strong personal leadership of the Ombudsman.

## Chapter 4 Organisational matters

OPONI is a tightly managed organisation delivering value for money. It has an existing staff of around 118 as at time of inspection, which is around 10 short of a full complement. Agency or contract staff have been used on occasion to cover short term need.

### Equality and Human Rights:

- 4.1 OPONI shows a good understanding of its equality obligations. Within the organisation harassment and grievance figures are low and there are stated policies on each. Most disputes are informally resolved. Inspectors found that the ethos of the office was one of equality and respect and the staff spoke very highly of the emphasis and lead that the SMT gives on equality. One staff member commented that, "The SMT takes equality really seriously and everybody knows that."
- 4.2 Staff feel that they work in a good environment, free from bullying and harassment. The system for dealing with staff grievances is fair and efficient and there are harassment contact officers available to staff. However, most staff were unaware of who the harassment officers were and their details had not been published on the intranet. There has also been a decrease in the number of harassment officers due to staff leaving the organisation.

### Recommendation 10

**OPONI should actively promote to its staff the support offered to them by the harassment officers and should ensure that staff in every department is made aware of their details and procedures for contacting them. OPONI should publish contact details on the staff intranet as a follow up to any awareness raising initiative.**

- 4.3 The staff employed by OPONI is broadly reflective of the composition of the population of N.Ireland. The organisation has in the past consulted the Equality Commission on its processes and practices and fully complies with equality legislation. An Equality Impact Assessment survey has been carried out and the most recent returns supplied to the Equality Commission indicated the breakdown of staff was around 62% male and 38% female, whilst 47% are from a Protestant background and 39% are from a Catholic background. (appendix 3, figures 5 and 6).

### Operations and Processes:

- 4.4 OPONI is an efficient and hard-working organisation with a task-oriented culture. As an organisation it is clearly focused on its main functions of ensuring maximum awareness, accessibility and responsiveness; the provision of an

effective process; and research that improves police policy and practice. Actions taken in relation to complaints are subject to a good recording and tracking system.

- 4.5 Information of a sensitive nature is handled and stored appropriately and access to it is very tightly controlled. As stated there is a dedicated intelligence unit, located separately from the other business areas, with controlled and restricted access and with a completely separate IT system. The unit has agreed protocols with the PSNI however, Inspectors were told that these had not been signed off at the time of the inspection. Investigating officers refer suitable cases to the intelligence unit and these requests are reviewed by the unit manager who will advise as to whether the unit can usefully contribute to the investigation of the case. The unit is busy and effective with the number of live cases running at just under 200.
- 4.6 At present a mediation project is under way, examining the feasibility of using mediation as an effective method of dealing with suitable complaints. Mediation would begin at inception of the complaint and would require the consent of all parties involved in the complaint. OPONI has researched the use of mediation in other jurisdictions and believe that the use of mediation would be beneficial to the complaints system as well as to all parties involved. Present legislation would require amendment and this is presently with the NIO.
- 4.7 The case handling system is due to be replaced having been in operation for over four and a half years. Since its introduction, the work of the Ombudsman has developed to a point where the system is no longer fit for purpose. The sourcing of a new case handling system should enable better interaction with police and prosecution systems especially with the development offered by the Causeway project, and enable OPONI to conduct intelligent interrogations of data collected. At present although unit costs can be determined for most areas of operation, this is not possible under the present system for the cost of individual investigations. However costs can be attributed to teams and directorates for example. This is problematical in that investigation of cases represents the bulk of the business of the office in terms of expenditure.
- 4.8 The organisation is working towards Iip accreditation, a worthwhile endeavour, and plans to check its progress towards final accreditation through the services of an external consultant. Inspectors found that there is an aspiration at senior level to work towards the use of the EFQM excellence model as a means to organisational development. This would be a positive development following on from the work done towards Iip status. The excellence model encourages self-assessment within organisations and has been successfully used by many public sector bodies including NDPB's.
- 4.9 The self-assessment document produced by OPONI for the purposes of this inspection was comprehensive and well evidenced. It could have been developed



further with regard to making judgements on performance based on the evidence gathered. The EFQM self-assessment process enables organisations to make such judgements so that key themes for development can easily be identified. CJI would encourage OPONI's aspiration to consider the use of the EFQM excellence model to aid further development.

### **Human Resources:**

- 4.10 Inspectors found that OPONI staff were well motivated by their role and regarded it as an important part of the normalisation process in N.Ireland. Investigating officers see their work as worthwhile and are encouraged by the level of access they have to all communities. Sickness levels of OPONI staff remain lower than average though they have increased a little recently. This is a good indication of the 'health' of the organisation.
- 4.11 The number of staff at time of inspection was 118, ten below the complement set in the management statement formulated together with the NIO. The investigative staff have a workload of around 28 cases at any one time. It is difficult to make direct workload comparisons with any other organisation due to the unique position of the Ombudsman as the investigator of complaints against the police, however, the investigative staff interviewed by Inspectors felt that their caseload was at the upper end of their effective working capacity.
- 4.12 Any reduction in the number of complaints received by OPONI (appendix 3, figure 1) has to be offset against the waiting list of historical cases to be investigated. Obviously, the focus has to be on 'live cases', however there are at present two teams dealing with cases of complaints against the police from the past. This forms an important area of work for OPONI in providing a service to people whose only avenue for complaint about police investigations from some years ago is through OPONI. Therefore, a reduction in the numbers of staff employed by OPONI would at this stage be premature, though a reduction in the longer term would probably be a good indicator of the progress of Northern Ireland towards 'normality.'
- 4.13 There are frequent competitions to replace staff who leave OPONI. Losses have been running at a rate of one a month for the last fourteen months. This has become a major issue for the office. Recent losses of staff have been to the PSNI, IPCC, DPP and CJINI. Well trained staff are attractive to other organisations.
- 4.14 Staff leave OPONI for various reasons. Since its inception around half of those leaving have resigned. However, of those resigning almost one third were officers returning to their own force, for example, at the end of contract or less often, on promotion. OPONI has worked hard to retain staff however, it is difficult to offset the attraction of better pay within other Criminal Justice organisations, for example, the IPCC and the PSNI. The quality of training

offered by OPONI is seen by staff as an incentive to stay whilst at the same time it makes staff attractive to other organisations. CJI does not propose that training should be reduced, but other incentives should be explored to encourage retention of a skillful workforce.

- 4.15 Performance reviews are not seen as useful and are not occurring as frequently as they should. Neither is the methodology consistent: the introduction of peer assessment in one of the investigative teams is a positive step to attempt to make the process more accurate and verifiable, but this is not widespread and has had a mixed reception amongst staff. Inspectors were told that, “Appraisals are not taken seriously, you can stick down anything just so as you have one.” The review process is six-monthly, with appraisal at yearly intervals. Inspectors were given numerous examples of six-monthly reviews being missed. The system is a NIO-wide, five-level one and the tendency has been to award levels at the higher end of the scale. It is overly bureaucratic and not user friendly. The system is due to be updated this year and the move to a more simple, user-friendly system should increase confidence in its use.

## **Training**

- 4.16 Training has a high priority, especially the accredited training programme (ATP) for investigators developed jointly by OPONI and the University of Portsmouth. Within OPONI the quality of training given to staff was described to Inspectors as, ‘One of the main incentives’. As well as the ATP there are monthly half-day training events for investigative staff on relevant issues plus any training identified through the appraisal system. There has been joint training with some of the key stakeholders, such as Forensic Scene Advisors Training, with FSNI. Seconded police officers from England and Wales now receive a five-day local induction which is regarded as being very valuable and gives officers from outside Northern Ireland understanding of the context in which the Ombudsman’s office conducts its investigations.
- 4.17 One senior member of staff stated that, “too much training had been done in the year 2004-2005”, and examples were given of the pressures on investigators undertaking the ATP on top of their normal workload. Additionally, the support given to staff who are on the ATP increases organisational pressures. Attendance of investigators on the ATP is well supported by the organisation and where possible less case work is allocated at times of high involvement with the programme. The majority of investigators are now on the programme and the aim is to have all the investigators accredited. Recent advertisements for OPONI have stated that investigators must be accredited within three years of taking up employment.
- 4.18 The ATP is open only to direct employees, not to seconded police officers who have been selected because they already possess the required skills. For the purpose of the effectiveness of their investigations, IOs need to have “at least as

much knowledge of investigative processes as the officers they are interviewing.” To this end the ATP was described as being “brilliant for the office.” However, this is an on-going development programme and as such would benefit from formative evaluation that is built into each stage to determine whether there has been any impact on confidence in the quality of OPONI investigations. Following completion of the programme the evaluation should be strengthened with a summative evaluation of its overall impact.

- 4.19 The ATP content does cover some of the material previously delivered by the extended induction training. The programme aims to provide investigators with the skills and knowledge required to undertake their role and enable them to view their role in the wider social context. The programme is based on established investigative, forensic and interview models and is described as being analogous to the initial CID training programme undergone by police investigators with the addition of workplace based portfolio building. Successful participants are able to move on to a degree course and around one third of those have done so. The Independent Police Complaints Commission in England and Wales participates in the same programme, which has meant that the costs to OPONI have reduced. Modules are delivered locally in Northern Ireland, keeping the cost and impact of staff absences low.
- 4.20 The programme is very worthwhile and apart from equipping investigators with the required skills and knowledge to be effective in their roles should aid with the credibility and quality of OPONI investigations. Knowledge of the programme outside of OPONI is not widespread and Inspectors believe that the benefits and status conferred by this programme should actively be communicated externally.

## **Recommendation 11**

**OPONI should continue its accredited training programme for investigators and should work together with the University of Portsmouth to publicise to the PSNI and other stakeholders the status and benefits of the programme.**

- 4.21 The University of Portsmouth does conduct some evaluation of the ATP, but this is to inform the development of the programme and does not seek to investigate links between it and confidence with any investigations conducted by OPONI. The ATP has already undergone some changes based on feedback from investigators. It would aid its development or of any subsequent courses, if an evaluation of its wider effect in the workplace and in the community were to be conducted.
- 4.22 Complaints Officers, who are usually the first point of contact between OPONI and complainants, are less well trained. These officers are essentially the front end of the investigation process and whilst they do not conduct formal

investigations, around 55% of reported cases are signed off through the complaints office. The role of the complaints officer involves the initial recording of the complaint, making initial enquiries and securing information, and making recommendations to the complaints supervisor as to the progress of the case. The complaints supervisors see all complaints made to the office and applying agreed criteria make the decision as to any further progress of the case. The roles of the complaints officers and supervisors are vital in ensuring fairness in the complaints process at this initial stage.

- 4.23 Although there are usually two complaints officers in attendance at the initial contact with complainants, these situations can be very emotive and have the potential to become heated. Training for current complaints officers has been limited and none has had any specific conflict resolution training, though Inspectors found that action to identify training for CO's was continuing at the time of the inspection. The high turnover of staff in the role of complaints officer has meant that a snapshot of the role would often reveal officers who have had limited training. Inspectors were told that although there is a 'panic button' in the interview rooms, some complaints officers are unsure of the steps they should take in the event of facing a difficult or potentially violent complainant, for example, whether to press the button and wait for assistance or to exit the room immediately. OPONI should find a way to reinforce to its complaint officers considerations for their own health and safety. For example, reminders during team briefings and providing written guidance.
- 4.24 The function of the training officer who is seconded to OPONI, was described to Inspectors as being "a real bonus." This role was seen as being mainly focused on the investigative staff and the training officer administers and co-ordinates the ATP along with The University of Portsmouth. Other staff training is mostly driven by line managers who make the decision as to whether courses are suitable or not. The training officer sees all the staff development profiles identifying training needs.
- 4.25 However, as stated at paragraph 4.15 above, performance reviews are not seen as useful and are not occurring as they should. Training needs are formulated from this review/PDP process, therefore the inconsistency in deployment of the system may have an impact on the currency and appropriateness of training. Staff appraisal is an area that will require development in the light of OPONI's liP aspirations. The forthcoming change to a more user-friendly appraisal system may go some way to addressing this issue.

## **Recommendation 12**

**OPONI should review the process by which training needs are identified so that training remains current and appropriate to the organisation, the role and the individual.**

## Chapter 5 Performance and results

The business of OPONI is managed effectively and it has recently consulted widely on its annual business plan for 2005-06 and its corporate plan for 2005-08. Objectives and targets are set and data is published on its performance against them.

### Strategic Planning and Management

- 5.1 The SMT was described as giving “clear leadership”, and there is a strategic plan for performance, quality assurance, policy and practice. At the time of inspection planning for a ‘disaster recovery’ strategy was being developed by the Director of Corporate Services. SMT conducts a corporate planning process annually and reviews progress quarterly with a major review every six months. Inspectors were told by a senior member of staff that, “The SMT is a small enough body to ensure that it is dynamic, issues are explored thoroughly and decisions are taken.” Many existing organisational objectives were shown as being achieved by the nine month review.
- 5.2 Business planning in OPONI is inclusive of all staff and there is a full two-day planning event each year. Plans are consulted on both internally and externally before final drafting and publishing. Inspectors found that staff at all levels were aware of the business planning process.
- 5.3 SMT has shown flexibility in response to changes in legislation. For example, the increased powers to conduct investigations into police policy and practice led directly to the formation of the Policy and Practice Directorate with a restructuring of roles such as quality assurance and research achieved within existing resources. Another example of SMT providing clear leadership based on listening to its staff was the creation of the posts of deputy investigating officers. This enables structured career progression opportunities for direct recruited staff.

### Results:

- 5.4 OPONI is a tightly managed organisation that delivers good value for money. It is delivering on its stated aims and objectives with public confidence in the system increasing whilst the numbers and frequency of serious complaints such as oppressive conduct are falling. (appendix 3, figure 2). Also on the increase are the numbers of the public who view the investigations carried out by OPONI as being impartial. It publishes useful management statistics to police district commanders on a monthly basis.
- 5.5 To improve its results with regard to its stated aim of improving awareness, understanding and confidence of Police Officers in the independence and impartiality of the Office, the outreach programme and recommendations made concerning it are important. Also of importance in improving results in this area

is the accredited training programme for investigators through The University of Portsmouth.

- 5.6 Inspectors found that there was a lower level of confidence amongst some CID officers in the quality of the investigations conducted by OPONI than there is amongst other sections of the police. There are many aspects to this. Inspectors found that there is an element of assumption by CID officers that someone without a police background cannot conduct investigations into police officers as effectively as a person who knows the workings of the police service intimately. However, many OPONI investigators have a police background so this is not the only factor. There is also the feeling amongst CID officers that investigating in the Northern Ireland context is unique and requires someone with detailed knowledge of and exposure to policing in that environment. However, many OPONI investigators do come from Northern Ireland. Some CID officers base their judgements on the low percentage of cases investigated by OPONI that result in prosecution of the officer under investigation. Of around 3000 cases reported each year the vast majority do not result in a criminal prosecution being brought. Though under previous police complaint systems in Northern Ireland the proportion of successful prosecutions resulting from complaints was lower. However, as stated previously, the role of prosecution lies outside the remit of OPONI. Its function is to investigate and to report on cases to the DPP/PPS where appropriate, and there is no evidence to suggest that investigations are lacking in quality.
- 5.7 OPONI has achieved tangible results as a result of investigations conducted into incidents and published as Regulation 20 reports. These reports may be published following referral of incidents to OPONI by the Chief Constable or by the Ombudsman calling herself in to investigate in the public interest where a complaint has not been made. Changes to police training in the use of CS spray and baton rounds are examples of where such investigations and publications have made a positive contribution to the development of policing methods.

#### **Finance and fixed asset utilisation:**

- 5.8 Finances are generally handled well. There are quarterly reports to the N.I.O. and no high risk issues have been identified as a result of external audits. The internal audit function is provided by an independent body and this will be put out to tender again in the forthcoming year. The NIO has agreed funding for the purchase of a new case handling system of £1.2m initially, followed by a sum of £1m over a period of seven years. This is additional to the grant-in-aid sum of around £7.1m for 2004-05 and £7.2m for 2005-06. Over the past three years OPONI has maintained expenditure within the allocated budget indicating prudent management of OPONI finances.
- 5.9 There has been a procurement policy in place since inception of the office, however, central control of procurement has not been vested in a dedicated

role, rather it was controlled through the finance function. Whilst no key issues regarding this had been raised by internal or external audit the advantages of having such a dedicated post has been realised by OPONI and a procurement officer had been appointed at the beginning of April 2005, just prior to this inspection taking place. To ensure that the procurement processes operate effectively requires organisational support through the clear communication and enforcement of policies.

### **Recommendation 13**

**OPONI should closely support and monitor the new procurement processes and ensure that all parts of the organisation are fully aware of their procurement responsibilities.**

- 5.10 OPONI has this year committed itself to producing signed-off accounts in time for inclusion in the annual report, demonstrating its desire to be as open and accountable as possible in its operations. It is the only organisation reporting to the NIO to do so. OPONI follows the guidance in *Government Accounting*, *Resource Accounting* and HM Treasury's NDPB guidance.

### **Managing Quality of Service**

- 5.11 Targets for the timely progression of complaints are set and closely monitored. There is a sixty day review of complaint cases and the set target of ninety days to investigate a complaint is stretching. At present the average time taken to investigate core cases is 84 working days. Investigators were very aware of the targets and these were seen as useful. There are also useful targets set and monitored in relation to informing all parties to a complaint of progress in its investigation.
- 5.12 The formation of the Directorate of Policy and Performance in 2003 involved the re-siting of the role of quality assurance under a new directorate. The directorate was established after power was given to OPONI to conduct investigations into police policy and practice. Concerns were expressed to Inspectors about the current priority given to quality assurance and best practice within OPONI. Inspectors found no evidence that quality assurance had been compromised by this re-organisation. Best practice guidelines are published on the intranet and figures for the correct closure of complaints are running at over 90%. However, staff engaged with quality assurance roles had been re-assigned temporarily to other tasks within the Policy and Practice Directorate. Whilst this demonstrates effective use of resources, the situation needs monitoring to ensure there is no adverse effect on quality assurance initiatives.
- 5.13 The quality assurance of how complaints are dealt with from initial receipt through to signing-off is based mainly upon reviews of reports submitted by complaints officers or investigators. Supervisors from both areas acknowledged

that little dip-sampling of interviews with complainants or any other parties to the complaint is carried out. The current work load prohibits extensive use of dip sampling practices. However, the use of dip sampling would be a useful addition to already existing quality assurance methods and is encouraged by CJI.

- 5.14 The production of statistical data is carried out by seconded NISRA staff and existing OPONI staff working under the Directorate of Policy and Practice. This has led to the formal application of research standards. NISRA operate strictly to set standards, whilst in the past OPONI in general followed and met these standards, they were not formally applied. Data produced by NISRA and OPONI staff is of a high quality and should become more detailed with the introduction of the new case handling system. However, there are some difficulties with the use of seconded staff. Induction to OPONI is run only periodically and this has meant that two of the existing three NISRA staff have not as yet had a formal induction. It would be useful if NISRA staff were provided with an induction package upon their arrival at OPONI.



## Appendix I Recommendations

1. OPONI, as part of its outreach strategy, should, with the co-operation of Police District Commanders, establish a programme of targeted presentations specifically designed for C.I.D. officers under their command.
2. To further increase its openness and external scrutiny OPONI should develop the role of the non-executive members of the Audit Committee.
3. The Ombudsman should take the opportunity of the forthcoming five-year review of legislation concerning the discharge of her functions to engage afresh with all the interested parties to establish better understandings about respective roles, objectives and methods of operation.
4. OPONI should establish clear protocols with the police as to the notification of quality assurance research methods into police policy and practice. These should include a framework for developing these types of approaches.
5. OPONI should appoint an independent community consultative group to provide a structured method of securing the community and stakeholder perspective on its work.
6. OPONI should continue to review its internal communications policy and develop the strategy to enable the effective dissemination of information throughout the organisation. This should include a framework of meetings at all levels with 'organisational information' as a standing agenda item
7. OPONI should gather the views of all staff prior to any future planned away days. It should also review the methodology employed in the last staff away days so that in future such events the methodology used encourages all staff, but in particular those at C and D grades, to contribute their feelings freely.
8. OPONI should take positive action to inform staff of the findings of, and actions arising from, the corporate cultural survey by extracting the executive summary of the document and circulating this to all staff whilst drawing their attention to the full report on the staff intranet. The corporate cultural survey should be made an annual event so that trends can be detected.
9. OPONI should re-state its commitment to reducing the numbers of seconded police officers. Long-term targets should be set, recognising that management will always have to respond to changing demands year by year.
10. OPONI should actively promote to its staff the support offered to them by the harassment officers and should ensure that staff in every department is made aware of their details and procedures for contacting them. OPONI should

publish contact details on the staff intranet as a follow up to any awareness raising initiative.

11. OPONI should continue its accredited training programme for investigators and should work together with the University of Portsmouth to publicise to the PSNI and other stakeholders the status and benefits of the programme.
12. OPONI should review the process by which training needs are identified so that training remains current and appropriate to the organisation, the role and the individual.
13. OPONI should closely support and monitor the new procurement processes and ensure that all parts of the organisation are fully aware of their procurement responsibilities.

Other suggestions not having the status of Recommendations are listed in appendix 3.

## Appendix 2 Methodology

The inspection commenced from February 2005 onwards and consisted of the following main elements:

1. Research and Data Collection
2. Consultation - Stakeholder interviews and submissions
3. OPONI fieldwork
4. Feedback and refinement

### I. Research and Data Collection

Documentation concerning OPONI was sourced and consulted. These included:

Dr Maurice Hayes' review of the Police Complaints System published in 1997  
NIO memos and submissions  
Enabling legislation  
The Patten Commission report  
The Criminal justice Review  
Northern Ireland Affairs Committee fifth report of the 2004-05 session  
OPONI publications  
OPONI website  
Home Office publication, 'Complaints Against The Police', December 2000  
Civilian Oversight of police in Australia, Colleen Lewis and Tim Prezier, Australian Institute of Criminology, December 1999  
Garda Siochana Complaints Board Annual Report 2003  
Overview of South African Independent Complaints Directorate  
Scottish Executive, HMIC report, 'The investigation of complaints against the police in Scotland'  
IPCC publications and website

### 2. Consultation- Stakeholder interviews and submissions

Letters were sent to over seventy organisations inviting comment on their interactions with OPONI and offering interviews with CJINI Inspectors or the alternative of making written submissions to inform the inspection. CJI made clear to all contributors that the examination of individual cases lay outside the remit of the inspection.

24 written submissions were received and 28 interviews were carried out as a result of this process with persons representing their organisations or individuals representing their own views. The following organisations or individuals contributed to the inspection process by way of written submissions, interviews or in some cases both:

Down District Policing Partnership  
Newry and Mourne District Policing Partnership  
Cookstown District Policing Partnership  
Ballymena District Policing Partnership  
Police Service for Northern Ireland  
Northern Ireland Retired Police Officers Association  
Police Federation for Northern Ireland  
The Police Superintendents Association for Northern Ireland  
Chief Police Officer Staff Association  
Policing Board for Northern Ireland  
Forensic Science Northern Ireland  
Equality Commission for Northern Ireland  
Northern Ireland Commissioner for Children and Young People  
NIO Police Division  
Belfast Harbour Police  
Independent Police Complaints Commission  
Include Youth  
Northern Ireland Council for Ethnic Minorities  
Church of Ireland  
Institute for Conflict Research  
Dr Maurice Hayes  
The Northern Ireland Coroners Office  
Belfast International Airport Police  
Office of the Oversight Commissioner  
Mediation Northern Ireland  
Institute of Criminal Justice Studies – University of Portsmouth

In addition, CJINI received an unsolicited representation from:  
Lord Maginnis of Drumglass

### **3. OPONI Fieldwork**

A team of four CJINI Inspectors and the Chief Inspector of Criminal Justice conducted a programme of interviews with the staff and management of OPONI over a period of four days commencing 19<sup>th</sup> April 2005. The formulation of the programme was greatly assisted by Greg Mullan, Director of Policy and Practice at OPONI. The programme consisted of individual structured and semi-structured interviews, focus groups, demonstrations and case tracking across a wide range of OPONI business. Staff representing the following business areas from all four directorates were interviewed by Inspectors:

Professional Standards  
Administrative  
Finance  
Human Resources  
Training

I.T.  
Information  
Library services  
Complaints  
Investigations  
Intelligence  
Senior Management Team  
Statistics

In addition to the programme of interviews Inspectors examined the intranet and case handling systems.

Following the four-day programme additional interviews were held with Union representatives and one of the non-executive members of the Audit Committee.

#### **4. Feedback and Refinement**

CJINI was assisted in the process of the inspection by the Parliamentary and Health Service Ombudsman, Ann Abraham. Ms Abraham attended a OPONI heads of unit meeting along with the Chief Inspector of Criminal Justice and the lead inspector. Following this meeting Ms Abraham visited OPONI and conducted informal meetings with the Police Ombudsman and her senior staff. Findings were collated and refined as a result of Ms Abrahams' advice before presenting them to OPONI senior management team. A draft outline of the proposed recommendations was prepared from the evidence gathered during the inspection and forwarded to OPONI so that action planning could be considered.

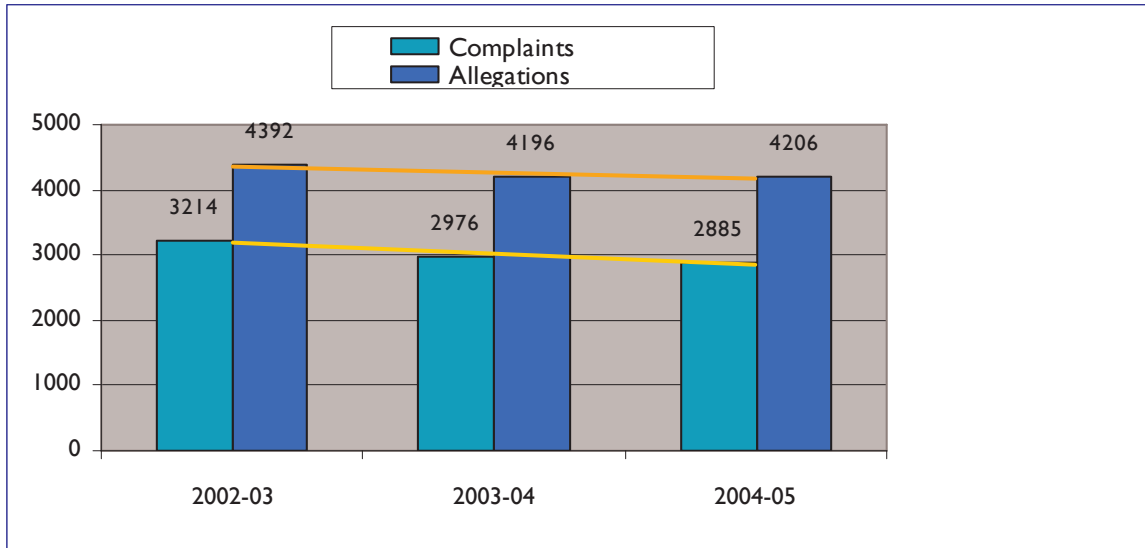
## Appendix 3 Minor recommendations

1. When delivering presentations to the police as part of the outreach strategy it would be useful to analyse participants' responses so as to compare the impact on newly recruited officers as against more experienced DCU staff (1.5)
2. Where an incident subject to a complaint and OPONI investigation has resulted in change to police policy or practice, it should be possible to include a review of these changes and publish this alongside the results of the investigation (1.18)
3. To improve the efficiency of OPONI with regard to the investigation of complaints it would be useful to develop a protocol with the PSNI concerning the timely supply of documentation from CJU's (1.24)
4. There should be more regular meetings between OPONI and the full Policing Board in an effort to improve relationships (1.25)
5. It would be useful if OPONI were to review its closure system for complaints and introduce a more user friendly service with the option of personal explanation of the reasons for closure (2.3)
6. The provision of information leaflets translated into the main ethnic minority languages used in Northern Ireland for use by organisations such as NICEM would be a positive step in promoting the services offered by OPONI to people who have a different first language (2.7)
7. It would be a useful additional method of reporting to the community if answers to parliamentary questions were published to OPONI internet as well as to the staff intranet (2.14)
8. Where possible the publication of minutes of meetings, for example, SMT and JNCC, on the intranet would be useful to staff and may help to improve internal communications (3.5)
9. It would be useful if a page counter system was implemented so that usage of the staff intranet could be monitored and adjustments made to information as appropriate (3.7)
10. There is a strong case for explaining policies at team meetings to re-inforce staff understanding of them and to enhance deployment, as well as giving staff another opportunity to voice any concerns (3.8)
11. CJI would encourage OPONI's aspiration to consider the use of the EFQM excellence model to aid further development (4.9)

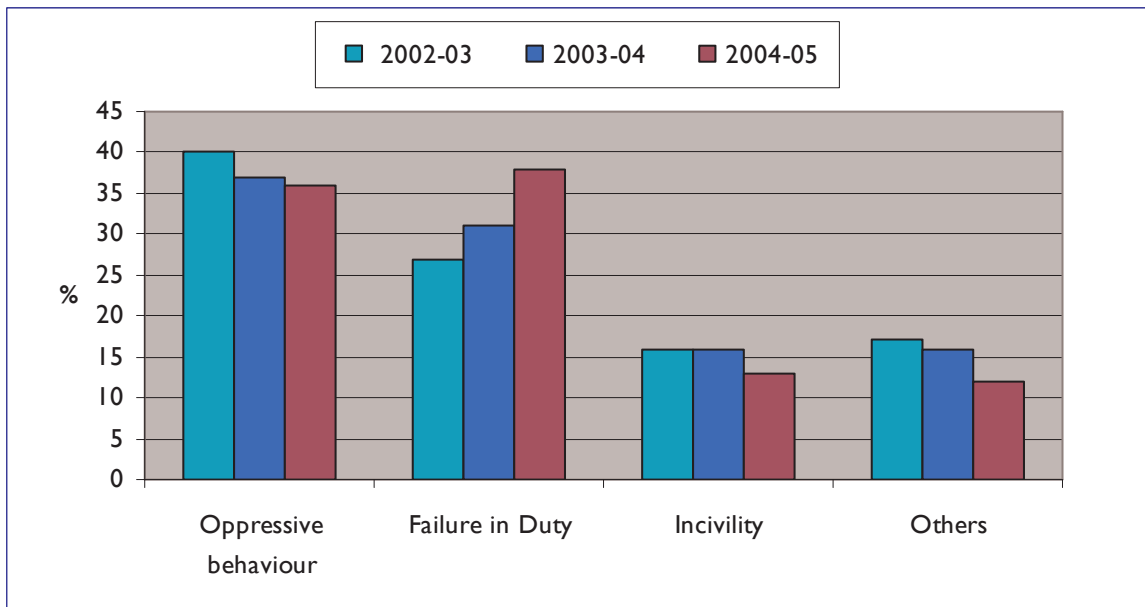
12. CJI does not propose that training should be reduced, however, other incentives should be researched in an attempt to encourage retention of a skillful workforce (4.14)
13. OPONI should find a way to reinforce to its complaint officers considerations for their own health and safety. For example, during team briefings and providing written guidance. (4.23)
14. It would be useful if NISRA staff were provided with an induction package upon their arrival at OPONI. (5.14)

## Appendix 4 Performance statistics

**Figure 1: Complaints and Allegations 2002-03 to 2004-05**

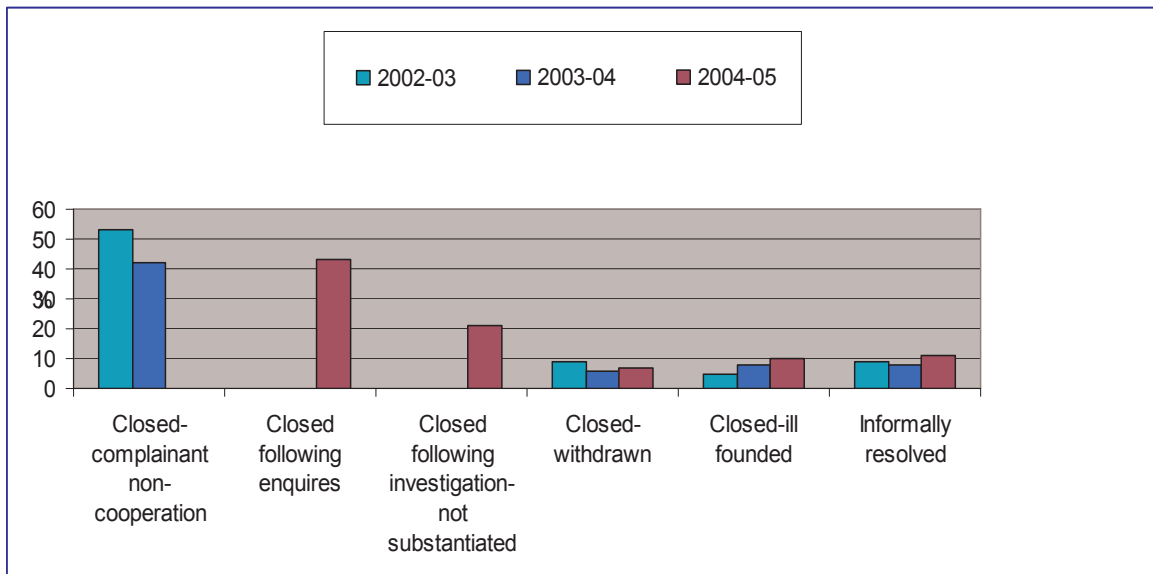


**Figure 2: Allegation Types**



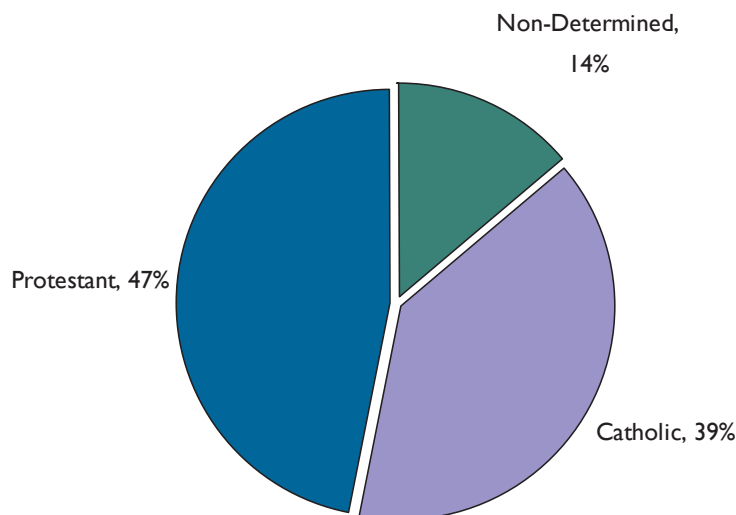


**Figure 3: Most common categories of closed complaints 2002-03 to 2005-05**

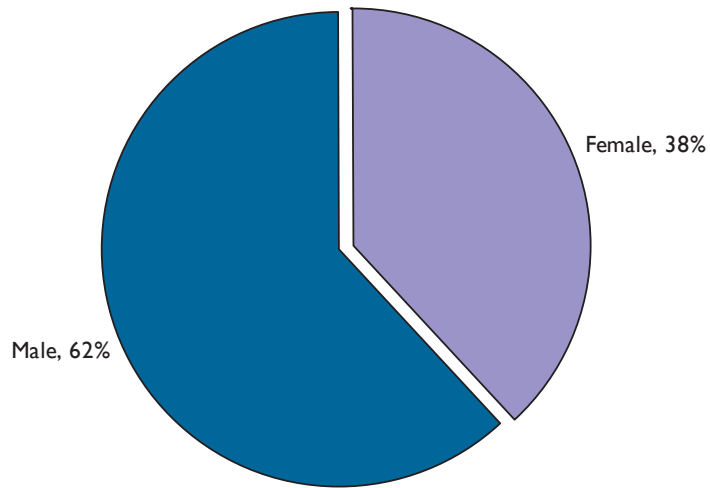


Categories of closure have changed over the period shown therefore figures for certain categories are not always available

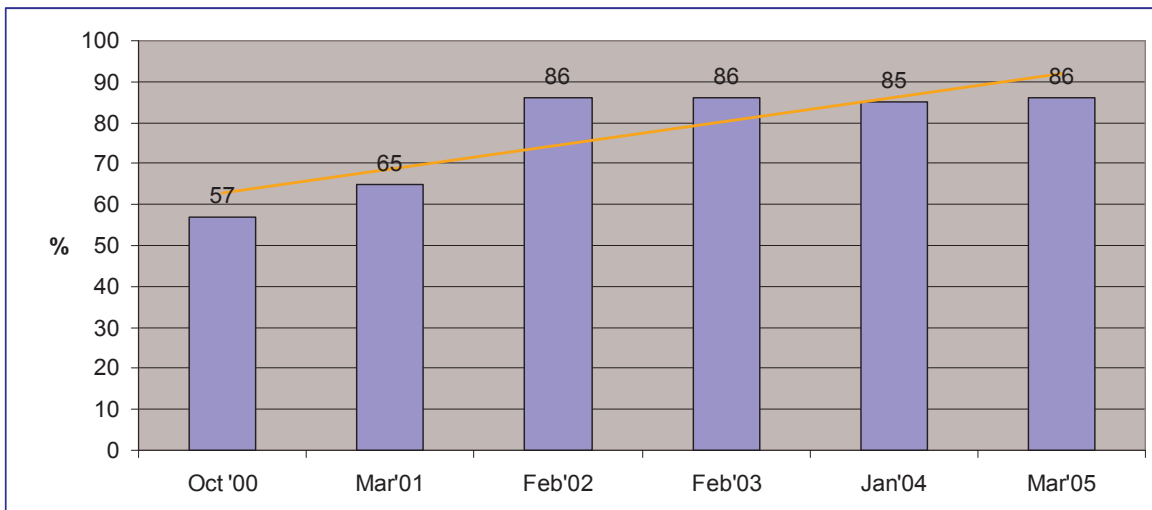
**Figure 4: Breakdown of OPONI staff by community background as at 01/01/05**



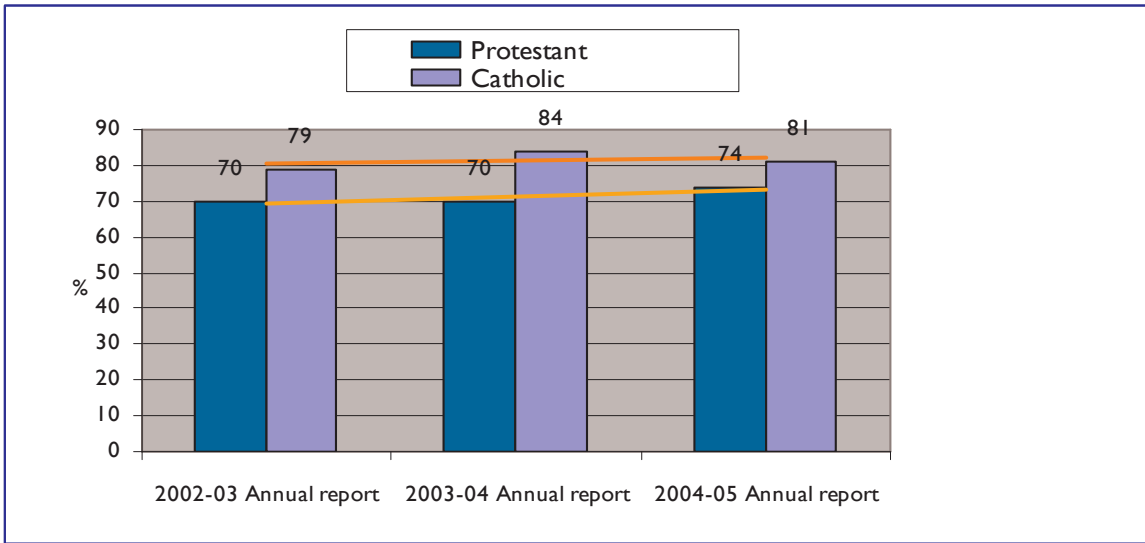
**Figure 6: Breakdown of OPONI staff by gender as at 01/01/05**



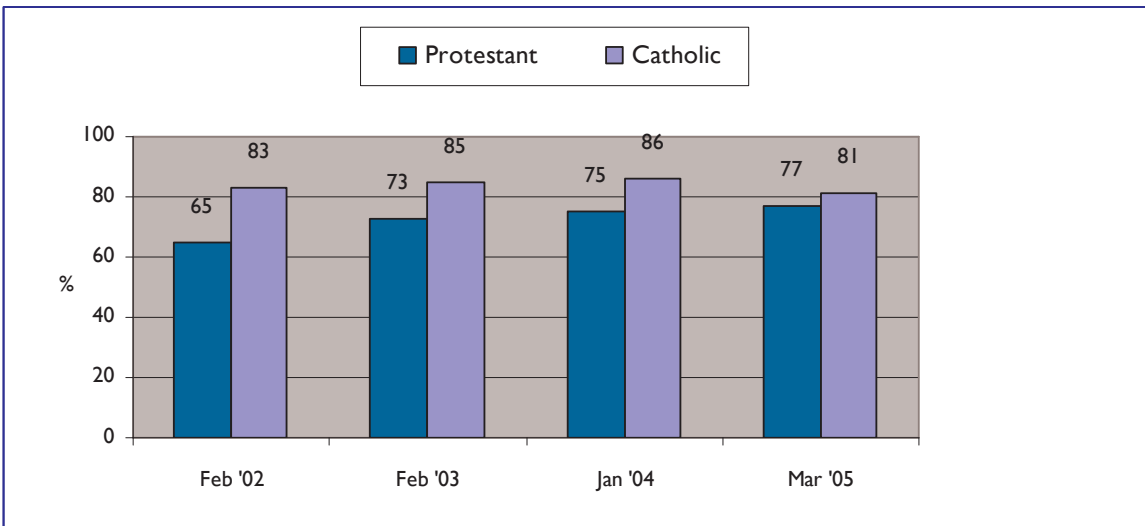
**Figure 7: Awareness of Police Ombudsman**



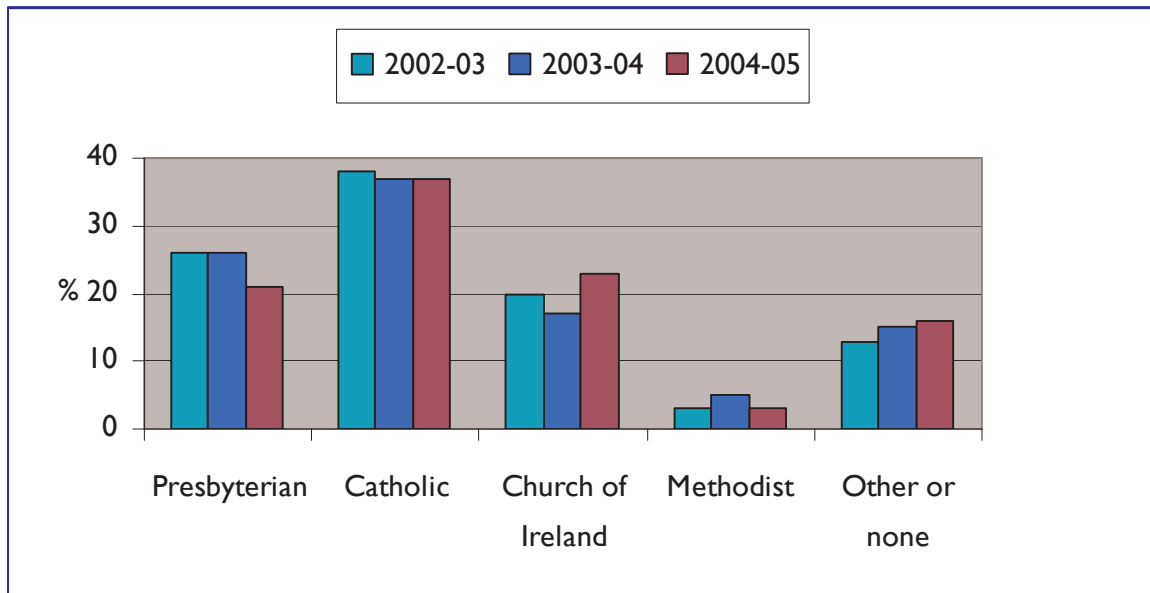
**Figure 8: Confidence in impartiality of Police Ombudsman**



**Figure 9: Proportion of respondents thinking the Police Ombudsman would help the police do a good job**



**Figure 10: Complainant community background**



## Appendix 5 OPONI response to recommendations

1. District Training is currently organised through PSNI training branch for all officers who serve in District Command Units. The Police Ombudsman seeks to get access at all types of officer, including CID officers when training is provided in the District Command Units. However CID officers rarely attend district training. The requirements of CID officers in relation to understanding of the work of the Police Ombudsman are identical to those of other officers. The Police Ombudsman will ask District Commanders to make CID officers available for training, and hopes that the PSNI will encourage these officers to attend the training when it is offered.

It is important to note that the Police Ombudsman's staff have also presented on five occasions this year at the Detective Foundation Course, Crime Training, usually to constables and sergeants, and on three occasions to the PSNI Senior Investigating Officer Training, at which presentations are made to officers up to the rank of Detective Superintendent. Presentations at these events involve discussion of issues such as primacy of an investigation following a critical incident, joint scene management, the impact of a Police Ombudsman investigation upon a PSNI investigation, disclosure and the distinctive roles of PSNI Internal Investigations Branch and the Police Ombudsman. On each occasion an offer is made to any CID team or squad at whatever level or location, to attend and meet with the officers in their preferred format. No requests have been made by CID officers in response to these offers.

2. The Police Ombudsman initiated the inclusion of non-executive members as suggested by Guidance issued by Her Majesty's Treasury. The Northern Ireland Office was persuaded that two non- executive members were required. They currently give a minimum of five days, but they are encouraged to familiarise themselves with the working of the Office, to visit the office when they wish to do so, and to attend key events such as the six monthly performance management reviews. Their involvement for additional days is at their initiative.
3. A review group will be established in November to take forward the statutory five-year review of the working of Part VII of the Police (NI) Act 1998. The review group will engage with all those who have any involvement with the Office.
4. Agreement has been reached with the PSNI as to a protocol for the communication of the fact that quality assurance exercises are to take place.
5. The Police Ombudsman has always viewed community-based consultation as absolutely essential. There is an existing extensive programme of outreach. The Police Ombudsman will explore the opportunities for enhanced structures for consultation.

6. The internal communication policy has been recently reviewed, subjected to consultation through the JNCC and adopted by the Senior Management Team. This policy, which will enhance communication within the Office, covers various aspects of communication including the continued dissemination of organisational information by various methods including the widely used intranet.
7. The views of staff and unions are sought prior to office-wide events, and the initial programme for the last away day was amended to ensure that it was created in accordance with staff wishes. There is extensive evaluation afterwards and future events are planned in the light of the outcome of the evaluation.
8. All staff were informed of the availability of the Corporate Cultural Survey and were advised of actions which were being taken in response to it. Such surveys will be conducted on a periodic basis as resources become available.
9. The use of seconded police officers is reviewed regularly. They will continue to be used as required for operational needs.
10. Staff are aware of the existence of the harassment policy which is available on the intranet. All staff will be made aware again of nominated harassment officers are aware of the existence of harassment officers and of the policy. The issue is part of the induction of all new staff.
11. The office will ensure that appropriate training continues to be provided to staff. Arrangements to publicise the training provision, including the award of accredited investigator status are in hand.
12. A training needs analysis has been conducted and the Office will review the scheduling of organisational and individual training needs.
13. The Office has always taken its procurement responsibilities with great seriousness and will continue to monitor and support all aspects of procurement to ensure that good practice is maintained.

#### **Other suggestions not having the status of recommendations /Minor Recommendations**

1. The Police Ombudsman has considered all the minor recommendations and it is the case that Minor Recommendations 1,2,,5,6,,8,10,13 and 14 are already normal practice in the Office.
2. As regards Minor Recommendation 3 the current protocol in relation to the supply of information from the CJUs is being amended.

3. As regards Minor Recommendation 4 the Police Ombudsman and her staff have been unable to persuade the Northern Ireland Policing Board to engage on a more regular basis, despite significant efforts.
4. As regards Minor Recommendation 7 the Police Ombudsman and her staff have noted that Parliamentary Questions and the answers thereto are published on the Parliamentary web-site. However the Police Ombudsman is happy to consider the matter further.
5. As regards Minor Recommendation 9 the Police Ombudsman has installed a page counter, but will not monitor individual staff usage as it is the view of the Senior Management Team that this would be an unwarranted intrusion into staff privacy.
6. The Police Ombudsman will consider the use of EFQM (Minor Recommendation 11) and is seeking to address the retention of her staff (Minor Recommendation 12) by all available means.











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