
STATES OF JERSEY



JERSEY POLICE COMPLAINTS AUTHORITY: ANNUAL REPORT 2019

Presented to the States on 2nd April 2020
by the Minister for Home Affairs

STATES GREFFE

JERSEY POLICE COMPLAINTS AUTHORITY

ANNUAL REPORT 2019

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JERSEY POLICE COMPLAINTS AUTHORITY

1. INTRODUCTION FROM THE CHAIRMAN

The Jersey Police Complaints Authority (JPCA) (the “Authority”) has now been operating for twenty years and is an independent body corporate, established in 1999 pursuant to the Police (Complaints and Discipline) (Jersey) Law 1999 (“the Law”). The annual report provides information about the work of the JPCA and the complaint process together with statistical information on complaint trends and outcomes. It is pleasing to report a continuation of the trend in recent years with a further reduction in the number of complaints in 2019, which warranted a full police investigation. The data in this and recent reports clearly demonstrates that only a small fraction of the many daily interactions between police officers and the Jersey public give rise to a complaint or allegation of misconduct. Nevertheless, the Jersey Police Complaints Authority is required to consider first and foremost the public interest. Through effective and independent oversight it is the role of the Authority to see that the public interest and the interests of the police themselves are equally served.

Throughout the last twenty years the law has been amended on a number of occasions in response to best practice elsewhere and changes in the structure of the States of Jersey. In 2016 a working group was established to undertake a comprehensive review of the Law and legislation in other jurisdictions and to recommend changes to the existing law. This stage of the process was completed in 2018 and initial law drafting work was completed in early 2019. Following further discussion and revision a final draft was completed in October 2019. The working group was made up of representatives from the Department for Strategic Policy, Planning and Performance, the Jersey Police Complaints Authority, the Law Officers Department, the States of Jersey Police Standards Department, the Jersey Honorary Police, The Jersey Police Authority and the Law Draughtsman’s Office. Looking to the coming months it is anticipated that once consequential law changes are complete the law will be presented to the States for debate and approval. This major overhaul of the law will further strengthen and create a strong and robust oversight regime that will continue to leave the investigation of complaints and misconduct with the police themselves (as is the case in the UK), but imbues the JPCA with the necessary powers to monitor and oversee those investigations closely. Accountability to a civilian authority is an immutable tenet of policing in a democratic society.

2. ANNUAL REPORT 2019

The Authority reports to the Minister for Home Affairs and has a statutory duty to provide an annual report to the States of Jersey. The role of the Authority is to oversee, monitor and supervise investigations by the Professional Standards Department of the States of Jersey Police, of complaints made against States of Jersey Police and Honorary Police Officers. The Authority does not carry out the investigations and its Members are not trained investigators. The Authority is independent of the police and its role is to ensure that the investigating officers carry out the investigations it supervises in a thorough and impartial manner and to ensure the police achieve high standards in the handling of complaints, conduct matters and death and serious injury (DSI) cases.

An effective police complaints system is vital to achieving public confidence in the Jersey police service by ensuring the police are accountable for their actions and lessons are learnt. The manner in which complaints, conduct matters and deaths and serious injuries during or following police contact are dealt with, has a huge impact on public confidence in the police, and this is perhaps more so in a small community such as Jersey with a relatively low number of complaints.

The States of Jersey appoints Members of the Authority for a period of three years (subject to reappointment up to a maximum of three terms) and their services are provided on a voluntary basis. The Members who served during the year are detailed below.

Mr Howard Cooper,	Chair,	Appointed February 2013
Mrs Rachel Catchpole,	Deputy Chair,	Appointed Jan 2017
Mrs Dee Taylor-Cox,	Supervising Member,	Appointed February 2013
Mr Graeme Marett,	Supervising Member,	Appointed February 2013
Mr Duncan Baxter,	Supervising Member,	Appointed March 2015
Mrs Gail McCourt,	Supervising Member,	Appointed March 2015
Mr Matthew Swan,	Supervising Member,	Appointed Jan 2017
Mr Graham Jennings*,	Supervising Member,	Appointed July 2018

* Mr Graham Jennings resigned from his position on the Authority in July 2019.

The Authority continues to operate from accommodation in St Andrew's Place and employs one part-time administrator. The Authority's office is open on Tuesday, Wednesday and Thursday mornings between the hours of 09.15 and 12.15.

The Members of the Authority are unpaid but are entitled to reclaim their reasonable expenses
No expenses were claimed during the year.

During the year (May 2019), two members, Mrs Dee Taylor-Cox and Mr Graeme Marett, completed their second three-year term of office and were subsequently reappointed by the States. In line with the Jersey Appointments Commission terms governing length of service, this will be their last three-year term.

Two further members, Mr Matthew Swan and Mrs Rachel Catchpole completed their first term of office in December 2019. Both members offered to serve a further term and their appointment was approved by the States Assembly with effect from 1 January 2020. Mrs Catchpole is to continue as Deputy Chair of the Authority

3. AUTHORITY'S POWERS

The Authority supervises three categories of investigation:

- 1) those arising from complaints made by members of the public which have not been dealt with by Informal Resolution. Please refer to [Section 5](#) on page 12.
- 2) those arising from issues referred to the Authority on a voluntary basis by the States of Jersey Police.
- 3) those specifically detailed in the Law, such as investigations arising from a complaint into the death of individuals following contact with the States of Jersey Police. Generally speaking the Authority is not involved in the oversight of the investigation of complaints which are of an operational nature, unless the matter is specifically referred on a voluntary basis, to the Authority by the States of Jersey Police.

One of the first stages of the complaints process is to assess whether the complaint is capable of what is currently known as Informal Resolution. The Authority does not have a role to play in supervising those complaints which are dealt with by way of Informal Resolution between the complainant and the States of Jersey Police. However, the Authority reviews annually the States of Jersey Police files relating to cases which have been dealt with by Informal Resolution.

Complaints made by members of the public against Honorary Police Officers are submitted to the Authority in the usual manner by the States of Jersey Police following a referral by the Connétable of the relevant Parish, usually at the direction of the Attorney General. The Attorney General is responsible for considering informal resolution of complaints made against Honorary Police Officers.

Voluntary referral cases, not necessarily complaints, are occasionally made by the States of Jersey Police on any internal matter, which is the subject of investigation by the Professional Standards Department.

The flow chart at Appendix 1 (complaints against a States of Jersey Police Officer) and at Appendix 2 (complaints against an Honorary Police Officer) show the entire complaints process from receipt of a complaint from a member of the public to the issue of the Authority's closure letter.

The Law requires that the Authority supervise all complaints alleging that the conduct of a member of the States of Jersey Police Force or Honorary Police Force resulted in the death of, or serious injury to, some other person. All deaths or serious injury following police contact would normally be subjected to an investigation by the police standards department and referred to the Authority for supervision.

All cases where a potential conflict or perceived bias is identified are taken very seriously and steps taken to avoid this situation arising. The Authority has a process to ensure that there is no conflict between the supervising member and any complainant or officer(s) subject of the complaint. If a conflict were identified, the case would be re-allocated to another supervising member to ensure impartiality.

The Authority is required to approve the appointment of the Investigating Officer. Usually the Investigating Officer is an officer of the States of Jersey Police of Inspector rank or above. However, on occasions the Authority either requires or agrees to the appointment of an Investigating Officer from an external police force. The need for the involvement of an external police force arises because of potential conflicts or complex cases involving senior officers or because a case is so serious that it warrants the appointment of an external force.

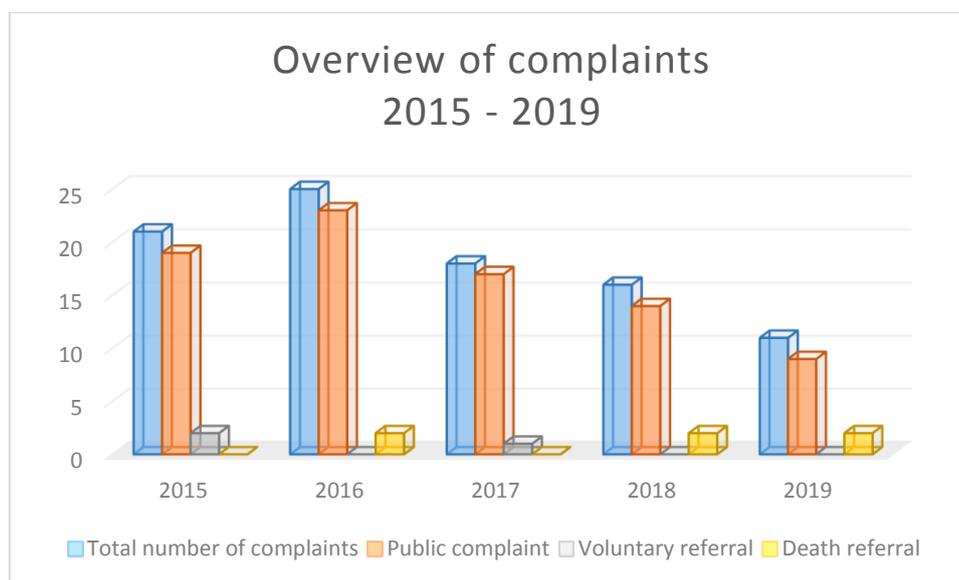
The Chair and Deputy Chair meet with the Professional Standards Department monthly to monitor progress of investigations and other relevant issues. These meetings provide a helpful forum to discuss the handling of all associated complaint matters, to challenge process and decisions where appropriate in a healthy and constructive manner, with the aim to improve the handling of complaints by the police service. The States of Jersey Police and Honorary Police Officers provide a professional service to the public of Jersey and standards are generally very high. However, on occasions officers and the organisations fall short of these standards and it is important to have a system that can quickly establish what has gone wrong, while ensuring there is appropriate accountability at both individual and force level and that lessons are learned. Learning outcomes arising from complaints are taken up by the States of Jersey Police Learning the Lessons Forum and disseminated across the force as appropriate.

Members of the Authority continue to liaise with officers of the Law Officers Department with bi-monthly meetings during which current cases are discussed, reasons for any delay are examined and other relevant matters are considered. The introduction of a service level agreement between the Authority, Professional Standards Department and the Law Officer's Department in 2018 continues to work well, with most cases being concluded within agreed timeframes.

4. OVERVIEW

In total, 11 new cases were referred to the Authority for supervision in 2019 (16 in 2018) (18 in 2017) (25 in 2016) (21 in 2015), comprising 9 public complaints (14 in 2018) (17 in 2017) (23 in 2016) (19 in 2015), there were no voluntary referrals (0 in 2018) (1 in 2017) (0 in 2016) (2 in 2015) and 2 death/serious injury referrals (2 in 2018) (0 in 2017) (2 in 2016) (0 in 2015). A total of 7 cases were brought forward from 2018, bringing the total number of cases under supervision during 2019 to 18 compared with 22 in 2018, 27 in 2017 and 36 in 2016.

Overview of complaints	2015	2016	2017	2018	2019
Total number of new cases	21	25	18	16	11
Split as:					
Public Complaint	19	23	17	14	9
Voluntary referral	2	0	1	0	0
Death referral	0	2	0	2	2



There were two cases referred to the Authority by the States of Jersey Police relating to death or serious injury following police contact.

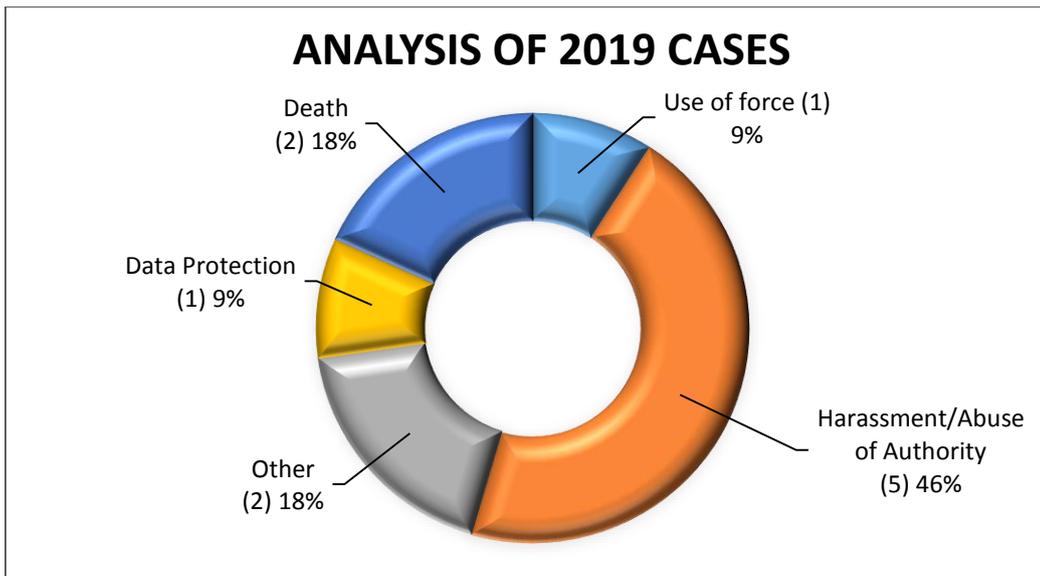
In 2019 the Authority liaised with the Citizens Advice Bureau to ascertain the number of enquiries made to the Bureau about police related matters to ensure that wherever possible members of

the public are given adequate opportunity to proceed with a complaint. The Bureau advised the Authority that during the year it had received 91 enquiries (84 in 2018) (55 in 2017) (38 in 2016) (67 in 2015) about police related matters of which 17 (12 in 2018) (11 in 2017) (13 in 2016) (14 in 2015) were specifically related to complaints against the police and the complaints process. The Authority notes that this number of enquiries is slightly higher than previous years but is consistent with the level of enquiries referred to the Authority although there is no way of knowing how many of the matters raised with the Bureau were formally referred to the Authority.

5. ANALYSIS OF COMPLAINTS

Nature of Complaint	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Excessive use of force	5	6	14	10	9	13	9	4	3	3	1
Harassment/ threatening behaviour/ abuse of authority	13	2	8	6	6	12	6	6	6	7	5
Property Damage/Loss	0	1	0	0	0	2	0	0	1	0	0
Instances relating to death/serious injury	1	1	0	2	2	2	0	2	0	2	2
Use of Pava spray	0	0	0	1	1	0	0	0	0	0	0
Other	7	6	13	7	7	5	5	11	7	3	2
Data Protection Breach	0	0	0	3	1	1	1	2	1	1	1
TOTAL	26	16	35	29	26	35	21	25	18	16	11

Table 1 – Nature of complaints supervised



Summary explanation of cases

The 1 use of force complaint was found to be unsubstantiated

Of the 5 complaints alleging abuse of authority, 1 was found to be frivolous, 1 substantiated, 1 partly substantiated and the remaining 2 cases were found to be unsubstantiated.

In 2019, 1 case was relating to the Data Protection Law; this case was carried forward to 2020.

The 2 cases which fall into "Other" in Table 1 relate to allegations concerning lack of investigation.

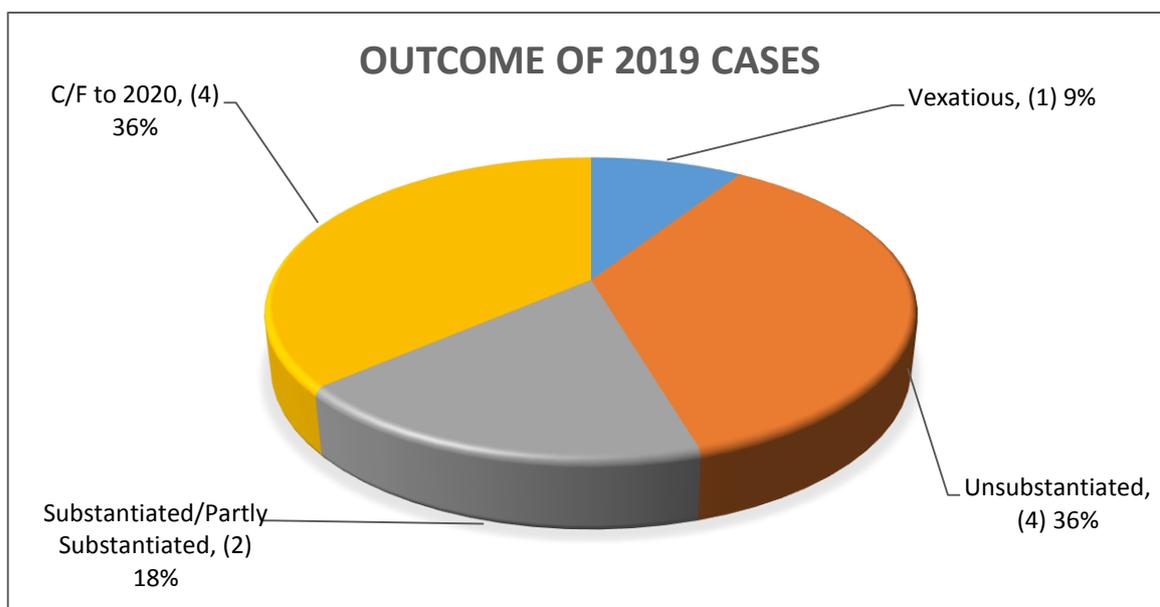
Of the 11 new cases supervised, 10 complaints referred to the Authority in 2019 related to the conduct of States of Jersey Police Officers. There was 1 new case concerning the conduct of an Honorary Police Officer.

Of the 10 States of Jersey Police Officer cases; there were 2 referrals relating to death/serious injury following police contact and the remaining 8 were public complaints – 3 relating to operational concerns and 5 against specific police officers.

Outcome of cases supervised

Outcome	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Withdrawn or Incapable of Investigation	13	7	11	10	11	7	6	2	4	2	0
Vexatious/ Frivolous	0	0	1	0	0	1	0	1	1	2	1
Unsubstantiated	8	7	13	11	9	19	10	14	10	7	4
Substantiated/ Partly Substantiated	5	2	10	8	6	8	5	8	3	5	2
Outstanding at year end	0	0	0	0	0	0	0	0	0	0	4
TOTAL	26	16	35	29	26	35	21	25	18	16	11

Table 2 – Outcome of Cases Supervised by Year Initiated



At the end of 2019, 11 cases had been referred to the Authority (4 cases have been carried forward to 2020 and are still being investigated).

7 of the 11 new cases that were referred in 2019 were concluded in the year; of these 7, 2 cases were found to be partly substantiated or substantiated compared with 1 case in 2018, 3 cases in 2017 and 6 cases in 2016. The Authority notes that 4 of the 11 new cases were found to be unsubstantiated (compared with 5 in 2018, 6 in 2017 and 8 in 2016).

Members of the Authority have cause, on occasion, to challenge the findings of the Investigating Officer or to question aspects of the investigation or certain recommendations. Whenever such a challenge is made the Authority ensures that any queries are resolved and all matters have been concluded to the Authority's satisfaction. Members of the Authority also, on occasion, make observations on operational issues, which may be called into question by an investigation. During 2019 the Authority's supervising members questioned or asked for further information on the investigations on 5 occasions - (2018 – 7 times). Their questions related to the content of investigation report and the process.

6. INFORMAL RESOLUTION

A review of the Complaints Register maintained by the States of Jersey Police, revealed that in 2019 the Police registered 53 complaints. 29 cases were resolved through the informal resolution process (25 in 2018) (18 in 2017) (13 in 2016) (14 in 2015) (22 in 2014). The Authority notes the continuing trend for more complaints to be resolved to the satisfaction of complainants, through the “informal resolution” process. Resolution of complaints by this process is, in the main, by way of an explanation of particular Police actions or responses, or as a result of a formal apology.

The Authority conducts a twice-yearly review of the records of all complaint cases which were informally resolved by the States of Jersey Police. These cases are not referred to the Authority. The Authority is satisfied these cases were dealt with appropriately and had no cause for concern with those complaints resolved in 2019.

7. TIME TAKEN TO COMPLETE INVESTIGATIONS

The length of time taken to complete an investigation has been reported on in previous reports by the Authority. Occasionally delays in the investigation are unavoidable when the matter is sub judice¹ due to an on-going criminal investigation or where delays are encountered in engaging with the complainant. On the whole the Authority had no particular concerns about delays in 2019.

During the course of 2019, bi-monthly meetings between the Authority, the Professional Standards Department and a member of the Law Officers Department continued and provided a useful forum for monitoring the progress of cases. The Authority notes that since the introduction of the service level agreement between the Law Officers Department, the Professional Standards Department (States of Jersey Police) and the JPCA the time taken to investigate and conclude the supervision of complaint cases has generally resulted in case conclusion within agreed time frames. At the end of 2019 there was one outstanding case under review by the Law Officers department.

¹ Sub-judice is generally invoked when the complainant, or the officer subject to the complaint, is facing a criminal charge. The complaint investigation is placed on hold until the criminal charge has been dealt with. However, the investigation into the complaint may proceed with the informed consent of the complainant to waive their right to sub-judice.

8. GENERAL SUPERVISION AND OVERSIGHT

The Members, between them, visited all Parish Halls to view the registers of complaints made against Honorary Police Officers; maintenance of these registers is required pursuant to the Law. The visits to each Parish are conducted on an annual basis in December and details of informally resolved complaints are referred to the Attorney General. The Authority requested one Parish to include a recently received complaint on their Parish Register; the Authority had no cause for concern when reviewing the records held by the remaining Parishes relating to the Honorary Police.

The annual review of Parish records by Members of the Authority and the twice-yearly review of the States of Jersey Police's complaint register by the Chairman and Administrator is an essential monitoring exercise to ensure that all complaints which are made by members of the public, whether to a particular Parish or to the States of Jersey Police, are, where appropriate, referred to the Authority for supervision.

The Authority continues to receive information of taser and firearms deployment by officers of the States of Jersey Police. It is noted that since tasers were introduced in 2013, a States of Jersey Police Firearms Officer has discharged a taser following deployment to an incident involving a weapon on four occasions (2017 one incident, 2018 two incidents and 2019 one incident). The Authority continues to receive notification of taser and firearms deployment. Under the provisions of the current law, the Authority has no formal role in these matters unless a complaint arises from their use or the matter is referred voluntarily to the Authority by the States of Jersey Police. There have been no complaints regarding Taser since they were introduced in 2013.

The Authority notes the use of body worn cameras continue to play an important role in the investigation of complaints, potentially leading to the informal resolution or withdrawal of a greater number of complaints than hitherto.

9. ACCOUNTS

The budget allocated to the Authority in 2019 was £38,500 (2018 £38,300) (2017 £38,300) (2016 £38,200) (2015 £36,630). The actual costs incurred in 2019 amounted to £37,834.01 (2018 - £40,748.09) (2017 - £26,856.36) (2016 £45,007) (2015 £31,283).

The budget figure includes £10,000 of indemnity insurance (which was not utilised), rental costs of £12,600 and office running costs of £16,100. It should be noted that the Authority incurred exceptional legal costs in the region of £21,000 (2018 - £14,000) resulting from the Authority taking legal advice. Two particular cases have carried forward into 2020 and legal costs for these cases are ongoing.

All investigation costs are borne by the States of Jersey Police, including the costs incurred in appointing external police forces where they are utilised.

Due to the complexity of some of the cases under review, the Authority reached agreement with the Minister in 2013 that, where deemed necessary and appropriate, additional resources would be made available to the Authority to enable it to employ the services of an independent experienced investigator to assist with the supervision of the more complex investigations. To date the Authority has not availed itself of this additional resource.

10. NEW INITIATIVES DURING THE YEAR

Complaints procedure via the States of Jersey Portal.

As part of the restructuring of the States of Jersey and the One Government initiative, the States have established a customer and local services operation based at the former social security offices. Customer feedback (complaints and compliments), can now be made through an on-line portal. Police complaints can now be made using this method. However, it should be noted that whilst this allows an additional initial route for the public to make a complaint against the police, the States of Jersey Police (Complaints and Discipline) (Jersey) Law 1999 will continue to determine the procedure for the handling and management of complaints following referral to the police through the States e-portal.

The States of Jersey Police gave presentations to all Authority members on Body Worn Camera and the use of taser in June 2019. The Chairman joined the States of Jersey Police on a Post Incident Management exercise focusing on death or serious injury following Police contact in November 2019.

The Authority continues to review its operating processes and procedures and where necessary changes and adapts its practices to ensure the supervision and oversight of police complaint investigations are conducted in an independent, impartial and transparent manner. All supervised

investigations continue to be subjected to further scrutiny through a second review process by another member/s of the Authority before each complaint is closed.

11. REGULAR COMPLAINANTS/UNREASONABLE COMPLAINANT CONDUCT

The Authority wishes to emphasise that it recognises the importance of considering all new complaints and complainants (regardless of whether the complainant has previously made a complaint), in a fair, impartial and independent manner.

The Authority is pleased to note that as part of the customer services programme introduced by the Government of Jersey, a customer feedback policy, which includes managing unreasonable conduct, is now operational. The States of Jersey Police have also adopted a new procedure for handling persistent and unreasonable complainants during 2019.

The Authority has a policy for handling complaints made against the Authority and its members. The Authority is committed to providing a high standard of service to the Jersey public. We aim to perform our role in a fair, reasonable, proportionate and timely manner to provide the public with an efficient service.

12. SUMMARY

The table and charts detailed earlier in this report show the number of complaints registered by the States of Jersey Police together with those referred to the Authority for supervision, to be lower than those of the previous years.

This reduction may be attributable to the introduction of body worn cameras since 2013 and the now, regular use of this equipment.

The proportion of complaints being satisfactorily concluded through the States of Jersey Police Informal Resolution process was slightly increased from last year at 29 complaints (57%) (2018 - 25 complaints (44%)) compared with 18 in 2017 (32%)

Comparison with UK police complaints data

It is not possible to make a direct comparison between complaints made against the police in Jersey and complaints made against separate police forces in England and Wales. There are a number of differences in complaint classification and systems together with variables on how they are recorded. Looking at the latest available police complaint data for England and Wales (2018/19), which records the number of complaints received per 1000 employees by each of the 45 police forces, with a view to giving an **indication only** of the number of complaints received by the States of Jersey Police per employee. In 2019 the States of Jersey Police received 0.50 complaints per 1,000 population (53 complaints from an estimated population of 106,800) (2018 – 0.55 complaints per 1000. 58 complaints from an estimated population of 104,000). Whilst reiterating it is **not possible to provide a clear comparison**, this data suggests that complaints received by the States of Jersey Police remain amongst the lowest 20% of Police forces in England and Wales.

The Authority is pleased to report the number of complaints received by the Police and those referred to the Authority continue at relatively low levels, when compared to the past ten years. However, as in previous recent years a number of cases were more complex, problematic and time consuming. In any complaints process it is not possible to please everyone and there will inevitably be complainants who remain aggrieved at the conclusion of the investigation into their complaint and who are unsatisfied with the handling and findings of the investigation into their complaint.

Throughout the period 2017-18 the Authority was the subject of an ongoing application for a Judicial Review into the supervision of a complaint. Following three hearings the Royal Court rejected the application for Judicial Review in late 2017. In January 2018 the complainant applied for the matter to be considered by the Judicial Committee of the Privy Council (Supreme Court – London). The Judicial Committee of the Privy Council rejected the application in May 2018. It is a requirement that decisions of the Judicial Committee of the Privy Council are registered in Jersey's Royal Court. However, the complainant registered objections to the Royal Court registration resulting in further unforeseen legal costs being incurred. The judgement was successfully registered in the Royal Court in July 2019.

Proposed Public Ombudsman

In March 2018, the States voted to support a proposition to bring forward primary legislation to establish a Public Services Ombudsman to replace the Jersey Complaints Board and other regulatory bodies established by the States of Jersey. In November 2018, the Jersey Law Commission published a topic report titled: Designing A Public Services Ombudsman For Jersey. This report set out various options and models of what a Public Services Ombudsman scheme might look like, together with estimated costs and comparison with other Ombudsman models operating in similar jurisdictions around the world. In July 2019 a consultation process

began giving islanders their say on whether the Government should appoint an independent ombudsman to look into complaints against public services. Part of the consultation sought views on how the Ombudsman should work with other watchdogs and regulators already established in Jersey. The Authority made a submission to this consultation in October 2019

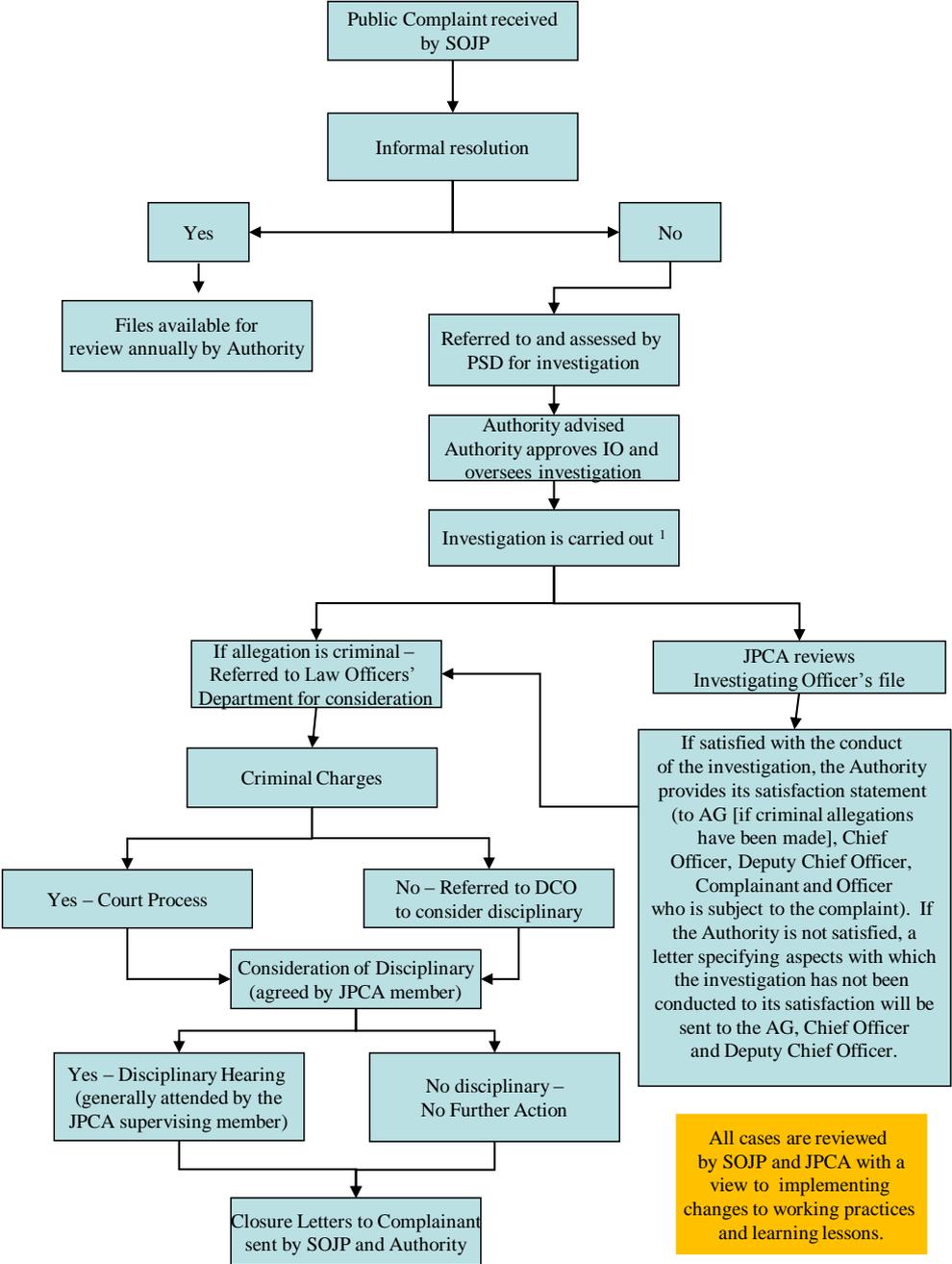
The Authority remains committed to continuing in its role of supervising and monitoring complaint investigations in an impartial, independent, thorough and fair manner. The Authority considers that the system of providing independent oversight and monitoring of the investigation into complaints is efficient, cost effective and accessible. However, there remains room for developing practice, and in particular to take account of the reforms to the police complaints and disciplinary systems in the UK, which will come into effect in early 2020. These reforms will move the emphasis from a culture seeking to blame and punish officers, to one which is more open, reflective of mistakes and focussed on a greater emphasis on learning, development and improvement. It is anticipated this will further increase transparency whilst maintaining and ensuring accountability. The Authority foresees the new law in Jersey will similarly provide opportunity for learning, improvement in practice and procedure, further enhancing public confidence in the service provided by the police and the Authority.

Acknowledgements

The Chairman would like to express his appreciation to Mr Graham Jennings, who stepped down during the year on health grounds, for his time with the Authority. The Chairman is indebted to all the voluntary Members of the Authority who give up their time so generously in the conduct of their role, and strive to ensure impartiality and fairness at all times. The Chairman is particularly grateful to the administrator for the continuity and efficiency she brings to the Authority and for her continued dedication and professionalism.

Appendix 1 – Flow chart – States of Jersey Police Officer

Flow Chart – Jersey Police Complaints Authority- Complaint Process
Complaint Received Against a Police Officer

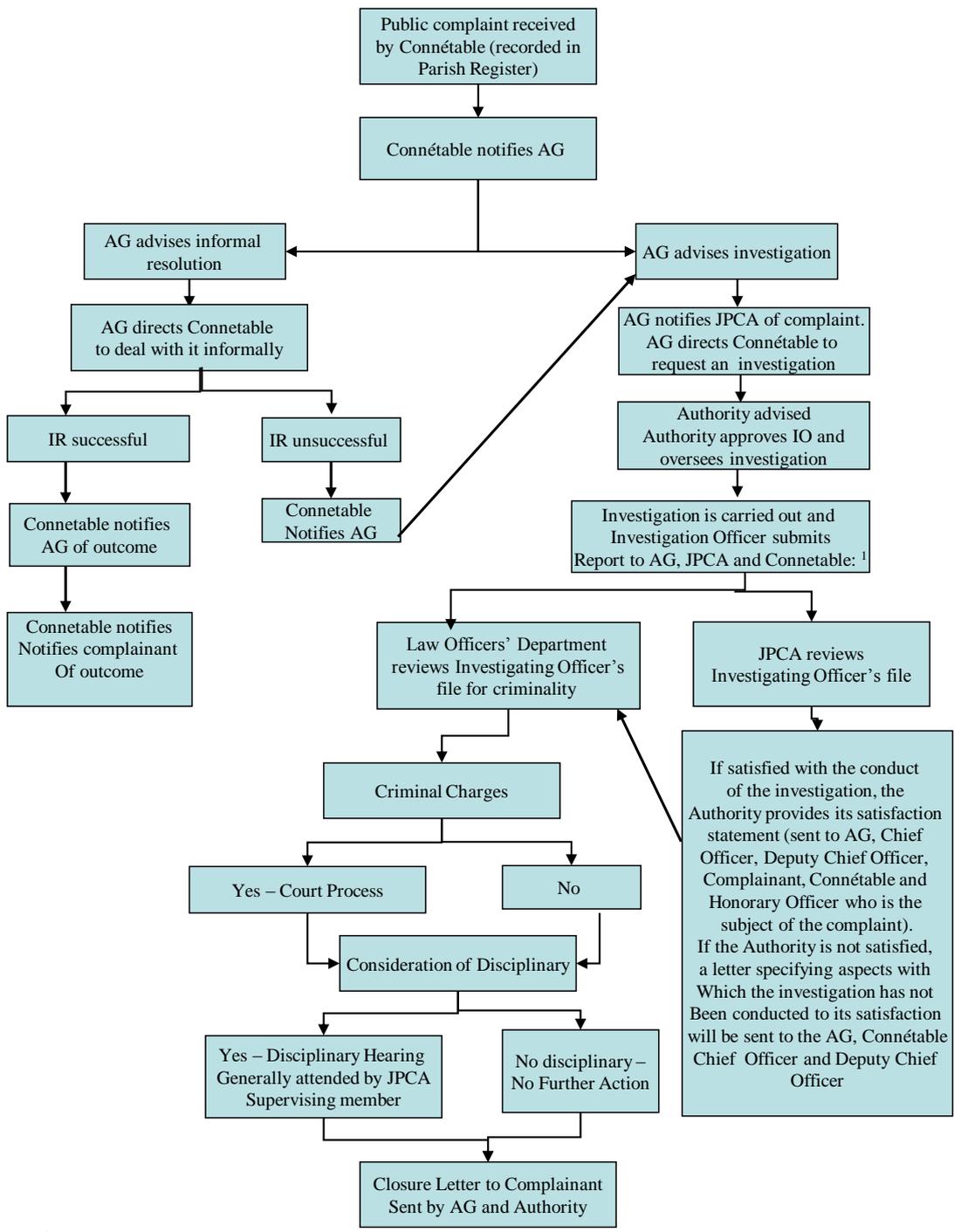


All cases are reviewed by SOJP and JPCA with a view to implementing changes to working practices and learning lessons.

¹ Refer to footnote on page 8

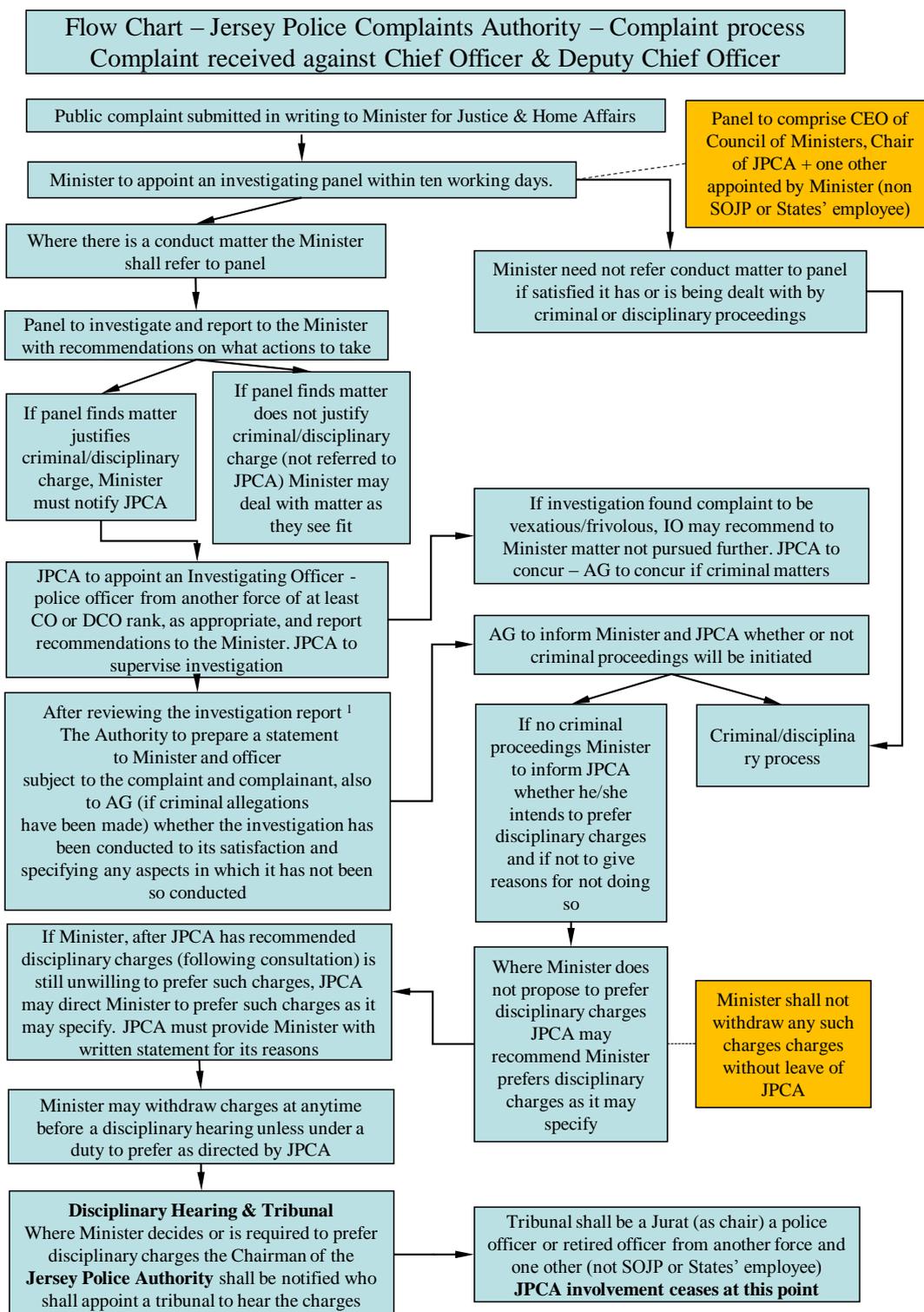
Appendix 2 - Flow chart - Honorary Police Officer

Flow Chart – Jersey Police Complaints Authority - Complaint Process
Complaint Received Against an Honorary Police Officer



¹ Refer to footnote on page 8

Appendix 3 - Flow chart – Complaint received against Chief Officer and Deputy Chief Officer



¹ Refer to footnote on page 8