Avon and Somerset Police and Crime Commissioner

INDEPENDENT RESIDENTS' PANEL

Complaints Review: Friday 10 June 2016, 10am-3.30pm

Complaint category types: Honesty and Integrity

STRUCTURE OF THE SESSION

Five Independent residents' Panel (IRP) members attended this quarter's meeting, reviewing 18 completed cases from a total of 50 available files. The theme was complaint allegations against the Police within the category of 'Honesty and Integrity' and this included three sub-categories of: Irregularity regarding evidence and perjury; corruption or malpractice; and mishandling of property. Panel members recorded their comments for the Professional Standards Department, (PSD) to read, comment on, and use for any organisational learning.

There was a round-table summary: each panel member summarised their feedback on the complaint cases that they had reviewed, which included both specific and general issues as well as suggesting organisation learning about operational policing matters. This session was attended by the Police and Crime Commissioner's Senior Finance Officer and Superintendent Richard Corrigan, Head of the Professional Standards Department (PSD).

DISCUSSION WITH THE PROFESSIONAL STANDARDS DEPARTMENT

Superintendent Richard Corrigan gave an update on current issues within the Avon and Somerset Constabulary's Professional Standards Department (PSD).

With reference to the Panel's comments on the lack of timeliness in completing complaints against the police within the category of discrimination (reviewed at the last Panel session), Supt. Corrigan responded that Avon and Somerset Constabulary's timeliness is the strongest in the country. Reports can be viewed on the IPCC website and on the PCC's website.



Supt. Corrigan stated that from 1 June 2016 the PSD have dealt with complaint investigations centrally, at Police HQ, to improve consistency of complaint-handling, being of a better quality thorough, open and transparent. Police Officers at District level, within the Local Policing Areas will continue to handle complaints that are categorised for a local resolved.

The process was launched in May 2016 for Police 'Service Recovery' (or triage) whereby complaints are resolved to the satisfaction of the complainant as quickly as possible, often by telephone within 72 hours of the complaint having been received, providing an explanation, apology where appropriate and actions taken to improve the police service in future. Service Recovery (triage) has been successfully used to swiftly resolve 40 out of a relatively high monthly total of 134

complaints received during May 2016. This is an encouraging start in providing a quick resolution. 94 complaints were formally recorded, with about half being 'investigated' and half being 'locally resolved'.

Supt. Corrigan requested that the Panel reviews complaints handled in the 'Service Recovery' category and this was agreed as part of the normal complaint case review process of reviewing complaints in the category that are investigations and in the category of a local resolution (the forth category being cases independently handled by the IPCC).

Note: A complaint must meet both of the following conditions to be suitable for 'local resolution: • the appropriate authority is satisfied that the conduct that is being complained about (even if it were proved) *would not justify bringing criminal or disciplinary proceedings* against the person whose conduct is complained about; and

• the appropriate authority is satisfied that the conduct complained about (even if it were proved) *would not involve the infringement of a person's rights under Article 2 or 3* of the European Convention on Human Rights (right to life; or prohibition on torture, degrading and inhuman treatment or punishment).

If a complaint does not meet these conditions, it is not suitable for local resolution and must be investigated by the appropriate authority.

Paragraph 6, Schedule 3, Police Reform Act 2002

Supt. Corrigan recognised that IPCC upholding around 50% of appeals was not acceptable and work is taking place to reduce this level.

Avon and Somerset Constabulary officers/staff visited Devon and Cornwall Constabulary as a best model for Local Investigations of complaints and Supt. Corrigan reported that he wants improvement within the complaints case handling system (called 'Centurion') as its use is not tight enough.

There are four publicly held Misconduct Hearings in June and July 2016, with each Hearing panel professionally led by a Legally Qualified Chair.

Action: The Independent Residents' Panel requested a link to the Police website publishing details of Misconduct Hearings. [Action complete].

Superintendent Corrigan talked through some of the issues highlighted in the previous quarter's report. He highlighted some learning that was taking place in relation to the potential child abduction case, which had been discussed.

A panel member had concerns about the IPCC disclosure of equal opportunities information, stated as confidential, to the Constabulary. Supt. Corrigan suggested that a letter from the Panel to the IPCC would have the most impact.

Action: It was agreed by the Panel Chair that a draft letter would be written to the IPCC, for comments from the PCC.

The Panel Chair suggested that the Constabulary consider developing and implementing a complainant self-service portal, similar to Track My Crime. Supt. Corrigan noted this as good feedback and a good point to consider.

Finally, a Panel member asked for clarification of PSD's request for Panel members' review of bias within complaint case handling. Supt. Corrigan mentioned protected characteristics and the request that whilst Panel members review each complaint case that if the complaint was in any way dealt with differently to a standard complainant – showing bias of any description - then to report this on the feedback form.

During the final business session, three Panel members agreed the updated Terms of Reference. The appointment process for four new panel members has started with the Panel Chair agreeing to sit on the appointments panel.

FEEDBACK REPORT

This feedback report contains panel members' comments and views, both positive and negative, along with the responses from the Professional Standards Department. Panel member completed feedback forms are also forwarded to PSD to review, along with this feedback report.

POSITIVE COMMENTS

Panel members identified a number of complaint cases which had been well handled and made a number of positive comments. Panel members commented generally that the files in this category of 'allegations against Police Officer/Staff honesty and integrity' were particularly detailed with a comprehensive audit log of enquiries (LOE). One Panel member wondered if this was due to the allegation category, as some of the cases started a considerable time ago, or if it reflected the general overall improvement in case file handling. As in the last review session, panel members also noted that the cases were often complex and contained a considerable number of complaint allegations.

The Panel also commented that there were many examples of allegations dealt with thoroughly, fairly and in a timely manner by the Police, often with complex complaint cases. There were also examples of witness statements recorded in the complaint case files and complainants handled well in difficult circumstances.

PSD response:

It is encouraging reading these positive comments made by the panel, especially when they continue to recognise incremental improvement in the quality of complaint handling. With particular acknowledgment given to the comprehensive logs of enquires (LOE) they had reviewed. We would like to thank the panel for their time and positive feedback.

We welcome the feedback on the thoroughness of handling complaint allegations. As a force we recognise the importance of recognising all allegations received. This clearly demonstrates the hard work and professionalism applied by our staff and officers in providing the highest level of service to those whom have made a complaint.

Overall, the PSD continue to work with continual improvement in mind, to enhance the positive experience a complainant can have whilst their complaint is being investigated.

Case review comments:

A1 – A very clear statement by PC BAYLEY. See negative point in the next section.

A2 – Considering that there were 12 allegations, the turnaround was very quick. One allegation was within the honesty and integrity theme and this allegation was reviewed by the Panel member. However, overall it was a very thorough investigation and very good collation of responses by the complaint investigations officer (IO) Mark 1880 WEST. The IO report, log of enquiries (LOE) and final letter were all excellent in detail and plain English readability. There were no negative points. However, see the operational policing comment in the section below.

A3 – Please see negative comments section below.

A4 – Please see negative comments section below.

E5 - PSD and the investigating team made rigorous attempts to clarify the legal position and to check if the complaint could be suspended. The final decision (not to uphold) cited: "what was ordinarily understood...", so reviewing evidence using common sense. See negative comments section below.

E6 – File correspondence shows that letters were answered in kind (or by email) and so communication with the complainant was continued reasonably well during the five month complaint investigation period. See negative comments section below.

E7 – This was a good, full file with numerous witness statements, an IO full report and completed Record of Complaint (ROC). This is a commendable complaint case. The complainant was updated by letter twice (in April and May) before the finalisation decision was sent to the complainant; there was also a clear record that the complaint investigation was suspended during the sub-judice

period; there was correspondence with the complainant about the reasons for the temporary suspension of the complaint handling; and the finalisation letter was a reasonable attempt to provide clarity to the complainant and included the IO's report which evidenced why the decision not to uphold the complaint had been reached. See the next section for further comments.

E8 – Complaint Investigations Officers (I.O.s) were courteous towards the complainant despite the abusive communications received and the I.O.s appeared to do their best to respond to sometimes provoking correspondence. Suicide threats were taken seriously and action was to take to support the complainant's apparent mental ill-health and distress. A second I.O. (D.I. MACININCH) wrote up a very full investigation log (20 pages long) which provides full background information on the complexities this complaint investigation faced. Witness statements (including a court statement) were recorded on the file so there was considerable evidence to corroborate the final decision (not to uphold the complaint). I.O.s and others did their best to communicate with the complainant and to respond to the complainant's communications. There were no concerns with this file.

B9 – A short, clear finalisation letter with a clear apology early on (4th sentence) stating: "The Police were at fault and for that I apologise". See negative comments section below.

B10 – A thorough and fair complaint investigation was undertaken, despite a strong temptation to throw the complaint out (dis-apply it) given the vexatious history of the complainant. See comments in the next section.

B11 – Specific complaint allegations are firmly rebutted and reasons are given for the refusal to uphold the complaint. See negative comment in the next section.

B12 – This was a straightforward complaint case, dealt with quickly within 8 weeks. See negative comments in the next section.

B13 – The Panel member acknowledged that it is good that the complaint investigation and level of misconduct can be changed as new aspects and evidence appear. Although the original complaint was withdrawn, the disciplinary process continued as a conduct matter because the complaint investigation has revealed a case to answer for misconduct.

C14 – This complaint was dealt with quickly and formally. A previous appeal to the IPCC was not upheld. There were no negative comments for this case.

C15 – This complex complaint was fully dealt with by PSD within 6 months and good actions were taken to independently ascertain possible fraud. See operational learning comment in the section below.

C16 – This complaint contained a huge amount of documentation and was thoroughly investigated. See negative comments in the next section.

PSD response:

These positive comments will be shared with the teams who have worked considerably hard to achieve successful complaint resolutions. It is encouraging to receive such positive feedback in areas where we have previously not, especially in relation to maintaining good communication with complainants, files with detailed logs of enquiries and thorough investigation reports and supporting documentation.

We appreciate the recognition given where investigating officers have demonstrated the highest level of professionalism when investigating some complex complaints despite receiving abusive communications.

It is pleasing to see that the messages around increased willingness to say sorry when things have gone wrong is beginning to be more widely absorbed.

The IRP acknowledged some letters written to the public were of a good standard.

NEGATIVE COMMENTS & CONCERNS, QUESTIONS & SUGGESTED ORGANISATIONAL LEARNING POINTS

Panel members had concerns about the following issues and also made suggestions that may improve the quality of policing service, Police Officer conduct, or improve the complaint handling process. Panel members invited the Constabulary to provide a response.

The complaint cases within the IPCC category of 'corruption and integrity'dated from 2014 and 2015 and the PSD template letters therefore reflected this age of file.

Officer awareness and training, as well as getting it right first time and attention to detail would have prevented some complaints. Also, improved and working modern technology would have reduced the number of complaints. As general policy, are complainants who are of concern regarding their

mental ill-health, referred to any external agencies or awareness raised with a crisis team, as part of multi-agency partnership working?

PSD response:

The area of greatest 'negative change' identified by the 2016 staff survey was IT equipment. In response to the statement 'The IT equipment provided by the force is appropriate for my work'. 21.3% of staff disagreed. Body worn camera training is well advanced and the technology is being rolled out to operational officers. This should provide enhanced accountability and encourage attention to detail. The equipment is generally welcomed by public and police alike. Moves to improve other IT equipment are being prioritised as a result of the staff survey result.

PSD Investigators share the responsibility of all staff regarding safeguarding. In general terms they are unlikely to come across safeguarding issues first hand, as they often meet complainants in response to previous interactions with the police, where such issues have been (or should have been) addressed. If it becomes evident that a safeguarding referral should be made, then this must be addressed, either direct, or via the Safeguarding Co-ordination Unit.

A few complainants correspond with us regularly, often sharing their general thoughts on policing. Some of this behaviour may be linked to mental health. No blanket referral or policy governs our response, because intervention must be bespoke to the individual issue. However where local action such as support, intervention, or preventative measures such as Behaviour Notices are appropriate, a referral will be made.

Case review comments:

A1 – Not a good log of enquiries and no dates or times logged for when the complainant was spoken to and the enquiry log also appears a bit retrospective. The case data does not include information on correspondence with the complainant so it is not known when the complainant was kept informed. The initial letter and complaint handling was timely. However there was then a gap of 4 months. The complaint category changed from a Local Resolution to a referral to the IPCC. However, the Officer handling the complaint did not appear aware of this and sent a finalisation letter as a local resolution. What is the process when changing a complaint handling method? Is there best practice to follow or room for improvement? See positive point in the previous section.

A2 – If a detainee is released from custody in the middle of the night, with unsuitable clothing and no money, having to walk many miles home (in this case a passer-by provided a lift), is it possible for the Officer arresting a person to ensure that the detainee has been informed that there will be no police transportation from the custody suite and the detainee will have to make their own

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arrangements? A reminder to the member of the public, in this often stressful situation, that money and a phone should be brought with them would be helpful in giving due regard to the person's welfare.

A3 – The Panel member noted that the initial arrest, evidence gathering, trial and conviction was in Bristol. However, the complaint was dealt with in Yeovil because the Officer had moved from Bristol to Yeovil. IPCC Statutory Guidance was stated. There was also a delay in confirming this complaint Investigations Officer as the Officer was busy for a number of months (the Office had moved locations and the Manager was querying the IO allocation).

A4 – There was no communication with the complainant for 3 months since from the date of the complaint and therefore the complainant kept writing letters. The log of enquiries was also not obvious in the electronic file – it was within an email – and of note is that the IO allocation was whilst the Officer was abroad, on secondment.

E5 – This was a very difficult file to follow, although it was recognised by the Panel member as being due to the complexities thrown up by the case. The process delays at the end of the complaint, for example a letter not signed, prolonged the investigation period unnecessarily and delayed the finalisation letter to the complainant. As an operational learning comment, the legal issues regarding the appeal against withdrawal of the firearms certificate should be understood and circulated to Officers so that any future complaint involving a similar need for a legal definition is not similarly delayed.

E6 – The finalisation letter states: "I am writing to inform you of my decision following the investigation of the complaints you made against the Constabulary. *Inspector Shadrick has submitted their final report* and I attach a copy of it for your information. I have decided that your complaint cannot be upheld." This is a poor final letter (these template letters were reviewed in August 2015 by Panel members), with no editing checks to correct grammatical errors (as indicated in italics above) and it was a bald terse formal letter. The complaint investigation seems to have been delayed even taking into consideration that two complaints were being investigated simultaneously. PSD had to chase up regularly.

An operational learning comment: There were two separate complaints handled simultaneously which appears to have contributed to delays in the complaint investigation. Has any mitigating action been introduced over the past 12 months to minimise future delays in similar circumstances?

E7 – There were no negative items detected in the case file. However, the final internal email requesting that a copy of the finalisation letter should be sent to the complainant contained an officer's opinion that could be read as derogatory. The note could have read, for example. 'The complainant is now outside the appeal time limit' and left on file as a fact.

B9 – The Police initially dealing with the initial incident should have been conscious of who was making the request for papers – the coroner or the CPS – then they would not have made the mistake.

B10 – Bias may be inferred in the Officer comments: "I do not invite you to draw an inference ... I would point out to you that these complaints follow a well defined pattern...criminal complaint... not substantiated."

As a general point, the Panel member suggests that there are two versions of the template finalisation letter or a conditional paragraph for complaint investigations, depending whether or not the complaint is upheld. If a complaint is not upheld then the narrative: "I hope you are satisfied with the investigation into your complaint" is likely to increase the complainant's dissatisfaction.

B11 – The complaint handling process was timely. However, if a complaint is held up because the case is sub judice then the complainant should receive notification explaining the suspension of the complaint process.

B12 – There were some errors in the finalisation letter which had to be re-written twice: once to add the appeal procedure – was the template ignored? Secondly, to apologise for a speed awareness course being mentioned as a possibility in the initial interchange. This was incorrect information due to the driver's excess speed excluding this option. Officer/Special Constable training should emphasise the maximum speeds for offering a speed awareness course and the limitations to Officer powers of discretion concerning the speed awareness course option versus prosecution.

C15 – Police Officers and Staff could be made aware of the possible dangers in signing/witnessing documents for a close friend (such as house transfer documents pending a divorce) and not keeping a record.

C16 – The electronic folder called 'STORM log files' is empty. Regarding operational learning comments about the complaint case, there was use of an unmarked car but no working VASCA; the single crewing policy required reviewing;

the Officer's dyslexia and typographic errors and mistakes regarding the time and month; discrepancy regarding the conditions being light or dark; PSD reliance on Officer's integrity rather than technology to prove the complaint case, with the complainant challenging the Officer's version; could the fixed camera have been checked to ascertain if it was working? The professionalism of the Police was questioned.

C17 – Although the complaint handling and outcome was considered fair and free from any form of discrimination or bias, a letter to the complainant states: "your extensive history of offending, particularly for dishonesty offences..." Your account lacks credibility. It is noted that the Officers have their Pocket Notebook checked on a weekly basis for 2 months, for content and timeliness. Is there a check in the complaint case management system (Centurion) that this is done?

F18 – See the next section for a file review request.

F19 – See the next section for a file review request.

F20 – Focussing on the finalisation letter, the Panel member felt that a reason should have been given as to why the missing property aspect of the complaint was not upheld. It is appreciated that the case is slightly sensitive because the Police Officer would effectively be saying that they didn't accept the complainant's account. However, it is important that the complaint understands the basis for the decision. Regarding the two complaint allegations that were upheld, no apology was offered and the finalisation letter contains the jargon "management words of advice". In the Panel member's view the letter should have contained a genuine apology and been more empathetic.

PSD response:

Although the panel have recognised an improvement in log of enquires, unfortunately there is a minority of cases where investigating officers have failed to achieve the standard expected. PSD will continue to communicate the necessity and importance of maintaining an accurate log of enquires to all investigating officers.

Having reviewed case A1 documents and Centurion this particular complaint was never referred to the IPCC, or suitable for a referral to the IPCC. It was also recorded as suitable for an investigation by district, not suitable for local resolution. Unfortunately, in this particular case the investigating officer dealt with this as an LR instead of completing an investigation. This was identified and PSD have spoken to the Inspector directly regarding this matter.

Where learning has been identified by the panel, PSD will continue to take this on board and include in our training to officers and staff whom manage complaints.

Sub-judice process; it is the investigating officer who should notify the complainant that their complaint is sub-judice and give an explanation as to why. Unfortunately, though in this particular case this has not been completed, learning and feedback will be given to the investigating officer.

As a department, we will take into consideration the feedback suggesting we have two versions of the template finalisation letter or a conditional paragraph for complaint investigations, depending whether or not the complaint is upheld. We would like to thank the panel member for their observations here.

As explained by Superintendent Corrigan at the review part of the 10th June 2016 Panel meeting, as of the 1st June 2016 PSD have retained all complaint investigations centrally to improve consistency of complaint-handling and quality. Only those cases assessed as suitable for local resolution are sent to the Local Policing Area to handle. We consider that this new process will minimise the likelihood of delays, consistency and quality.

The Professional Standards Department developed new letter templates following the panel's feedback last year, all of which are available for officers/staff. PSD will reinforce the message to ensure that these templates are utilised by Local Areas and that grammatical checks are carried out.

Professional Standards use Centurion to manage our investigations into complaint and conduct matters; we are in the process of enhancing our capabilities and functionality of the system, which will better equip our investigating officers to set actions and monitor for compliance purposes.

PSD continue to work with continual improvement in mind, to enhance the positive experience a complainant can have whilst their complaint is being investigated.

Requests for COMPLAINT file reviews

The following complaint cases are requested to be reviewed:

Case F18 – The Panel member was concerned that the complainant was not interviewed because the Police considered that there was sufficient evidence to charge the person. However the complainant was then offered a caution, it would appear, on the basis of the person's pre-cons without any PACE (Police and Criminal Evidence Act) compliant admission of guilt. Whilst that was acknowledged by the complaint Investigating Officer and the caution quashed, had this person not made a complaint then he would now have the burden of an unlawful caution with the consequences which could flow from that in terms of employment and sentencing for any future offences. The Panel member did not feel that the complaint finalisation letter recognised the gravity of what could be regarded as quite a serious misuse of power (even if done without any malicious intent). The Panel member also noted that the Inspector who authorised the caution stated in the log of enquiries:

"I am unable to tell you where any admission of guilt was recorded as I have not had sight of any of the paperwork".

The Ministry of Justice guidance for the administration of simple cautions states that the admission does not have to be made in a formal interview but it must be PACE compliant so it is concerning that the Inspector did not satisfy herself of this before authorising the caution.

Has this a situation occurred in other cases?

Due to the complainant's behaviour during the search and this person's (apparent) previous convictions, is it possible that Police Officers were looking for a speedy disposal?

In the complaint finalisation letter it is stated that:

"The accounts given by the officers are consistent with each other and indicate that there were sufficient grounds to arrest, that you were informed of the reason for your arrest and that your behavior on the day made it necessary for them to use force to restrain you."

As the consistency of the officers' accounts seems to be a determining factor, what is the current practice when Police Officers write their statements?

Do they write statements together or individually without any communication with each other? Obviously if Police Officers discuss their statements when they are drafting them then there will inevitably be a degree of consistency.

With regard to the administration of cautions, what guidance and training is given to Police Officers and why was correct procedure not followed in this case?

The lack of a PACE compliant admission of guilt would seem to be a fairly fundamental issue. What role did the complainant's previous convictions played in the decision making process in this case?

Was there any wider inquiry into the practices of administration of cautions in this Police Station, Neighbourhood Beat Team, District or Local Policing Area? What protected characteristics did this complainant have – was the complainant a member of any minority group? This was not evident in the complaint case file.

PSD response:

PSD take on board the comments made relating to this complaint file. Had the complainant not made the complaint and it had been investigated, he would still have a caution which he was not allegeable for.

- 1. Finalisation Letter We agree that the finalisation letter could have been written better and this should be fed back to the Chief Inspector.
- 2. Each complaint received by the Professional Standards Department is considered on its own merits in line with the IPCC Statuary Guidance and appropriate recording decision made. On receipt of complaints a check is carried out to establish whether there is an existing live complaint relating to the same matter.
- 3. In relation to the comments regarding the officers looking for a speedy disposal. This is the reviewer's opinion. All disposals are looked at to deem the most appropriate; it is unfortunate on this occasion that the correct PACE rules were not applied. This was not done maliciously but as an oversight.
- 4. There is no policy or any law in place in relation to officers writing their statements.
- 5. Standard training is provided to officers in relation to cautions. The custody sergeants and inspectors rely on the integrity of officers and Detainee Investigation Team staff to provide true accounts. On this occasion there appears to have been an error in communication resulting in the caution incorrectly being applied. Retraining for all officers involved should be considered to ensure this does not happen again.
- 6. No inquiry made regarding the administration of cautions on the policing teams.
- 7. The complaint form states the complainant is W1 White British

Case F19 – The Panel member was concerned that despite the complainant giving very scant information in the initial complaint and waiting two years before complaining, the complainant did subsequently provide cogent reasons for the delay and even if fears of repercussions were groundless, the fear may well have been genuine and the delay was the primary reason for the disapplication. The complainant was clearly concerned enough to take the time: a) to complain and b) to appeal against the initial dis-application. Before disposing of the complaint the complainant could perhaps have been spoken to and some initial investigations undertaken, for example whether there was a Detective of that name employed by the force in 2013. On the face of it these were potentially serious allegations and the Panel member suggests should not have been dismissed without

additional reasons. Furthermore, the Panel member is not sure it is correct to state that the Court would have highlighted wrongdoing by the Police Officer after the trial. Unless there was evidence of any criminal activity by a Police Officer then the Panel member is not convinced that a busy Crown Court judge or CPS prosecutor would involve PSD if a Police Officer had, for example, been discredited in cross examination.

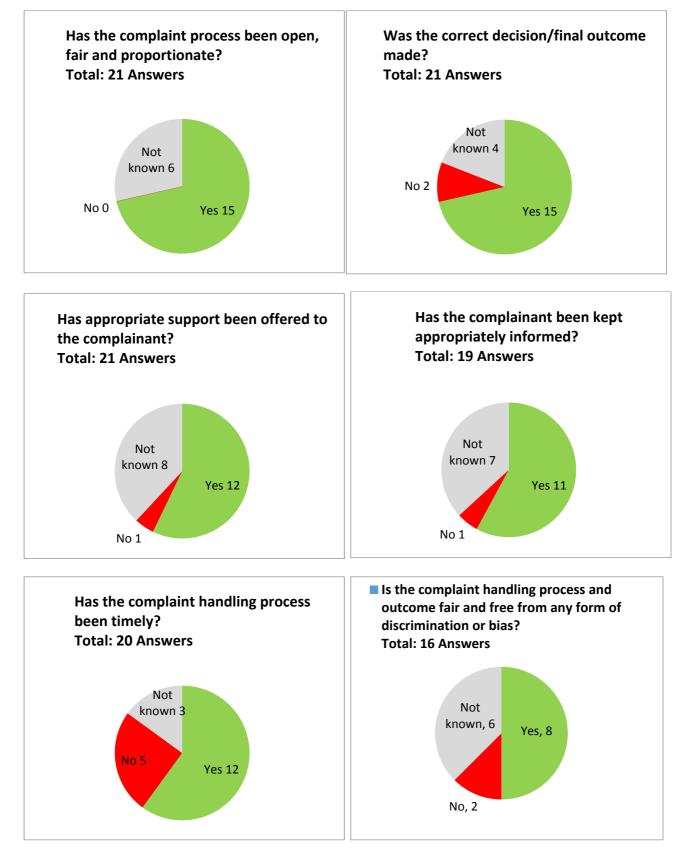
The Panel member is also of the view that it should have been explained to the complainant why the reason he gave for his delay in complaining was not sufficient – the letter to him gives no reason. IPCC Statutory Guidance states that one of the grounds for disapplication are: "More than 12 months have elapsed between the incident, or the latest incident, giving rise to the complaint and the making of the complaint and either that no good reason for the delay has been shown or that injustice would be likely to be caused by the delay." When considering whether to disapply a complaint, is the seriousness of the allegation(s) a factor in the decision making?

Do the Courts alert PSD to cases of potential misconduct which arise during trials? If so, how often does it happen?

PSD note the comments of the reviewer

Yes, should a complaint arise the CPS will notify the officer in case, the criminal justice department, will also notify PSD and vice versa, should PSD receive a complaint which could jeopardise a criminal complaint the CPS are notified at the earliest opportunity.

The rationale given by the complainant on this occasion is not one that would be deemed suitable to not disapply his complaint. His rationale was due to fear of repercussions from the force, therefore he knew he wished to make a complaint and chose not to.



APPENDIX 1 - FEEDBACK FORM STATISTICS - SIX QUESTIONS

These pie charts relate to the six questions in the feedback form. Panel members record 'not known' when the case file does not give sufficient detail to allow a categorical yes or no answer.

Note: Answers left blank on the feedback form are excluded from the pie-chart figures.