

LAWYERS FOR LIBERTY

Memorandum on the Independent Police Complaints of Misconduct Commission (IPCMC) Bill 2019

5 September 2019

1. Preamble

- 1.1. The Royal Commission to Enhance the Operation and Management of the Royal Malaysia Police (RCI) published its report in 2005, making 125 recommendations. While most of these have been implemented, their recommendation to set up an independent oversight mechanism was met with resistance and opposition from the police (PDRM). Instead, the Enforcement Agency Integrity Commission (EAIC) was established by the EAIC Act 2009 (EAIC Act). While the EAIC has many positive elements, it has been undermined by its limited resources and the fact that it monitors 21 enforcement agencies. That the overwhelming majority of complaints to the EAIC are about the PDRM alone¹ indicates the need for an authority to deal specifically with complaints of misconduct against the police. A draft Independent Police Complaints and Misconduct Commission Bill (2005 Bill) was proposed in the RCI Report in 2005 but did not become law.
- 1.2. In May 2019 agreement was reached with the PDRM that it was time for the Independent Police Complaints of Misconduct Commission (IPCMC) to be established.
- 1.3. Lawyers for Liberty have been advocating for the setting up of the IPCMC and a change in the culture of impunity in the PDRM for many years. We have represented numerous victims of police brutality, deaths in custody, shootings and cover-ups. We acted in a civil case on behalf of the family of Aminulrasyid Amzah, a 14-year-old boy fatally shot by the police in 2010, in which it was found that the police had no reason to open fire. We also represented the families of three young persons killed by the police at Glenmarie, Shah Alam in 2010, and several victims of custodial deaths

¹80% of complaints in 2017 were against the PDRM. See 'EAIC: Policemen received the highest number of complaints' (New Straits Times, 18 April 2018), <https://www.nst.com.my/news/nation/2018/04/358803/eaic-policemen-received-highest-number-complaints>.

included in our report, '5 Faces: A Story of Police Custodial Deaths in Malaysia'.² Not all cases of state violence lead to death. In 2014, we represented Norizan Salleh, who as a mere passenger in a car which the police wanted to stop, was shot five times and had a bullet lodged in her lung. Despite being further assaulted by the police as she attempted to leave the car, Norizan survived. The PDRM and previous IGPs have also been implicated in covering up some of the Barisan Nasional government's worst corruption, including the 1MDB scandal. The need for the IPCMC is abundantly clear. Fourteen years after the RCI recommendations, it is time to put an end to police impunity and restore public confidence in the force.

- 1.4. Therefore, we cautiously welcome the IPCMC Bill 2019 and commend the inclusion of a number of strong provisions aimed at ensuring the IPCMC will have independence and power. For example, the Commission will have the power to conduct investigations on its own initiative and will investigate any incident which results in grievous harm or death of a person in custody.
- 1.5. However, there are areas for improvement. Some of the strongest provisions of the EAIC Act and the 2005 Bill have not made it into the IPCMC Bill 2019. We call on the Government to ensure that the IPCMC Bill 2019 includes all the strongest aspects of the EAIC Act. We also recommend other changes to the IPCMC Bill 2019 to ensure that the Commission will have the independence and power it needs to be effective and draw upon examples from our own experiences and from other jurisdictions to ensure the IPCMC is in line with international standards.

2. Functions and Powers (Clauses 4, 5, 13)

- 2.1. We welcome the broad range of functions and powers of the Commission. However, the primary function of the Commission, as recommended by the RCI and in line with other jurisdictions, should be to receive and investigate complaints about the PDRM and its personnel. This should be worded more clearly and given more prominence in Clause 4. We suggest following the wording of the 2005 Bill or the EAIC Act, both of which place receiving and investigating complaints as the first and most prominent function.³

² LFL Report, '5 Faces: A Story of Police Custodial Deaths in Malaysia', 2018, <https://www.lawyersforliberty.org/5-faces-a-story-of-police-custodial-deaths-in-malaysia/>.

³ See Clause 12(1)(a) of the 2005 Bill, "to receive complaints made by members of the public against the Force and to inquire into these complaints and in particular to detect, investigate and prevent police corruption and other serious misconduct", and Section 4(1)(a) of the EAIC Act, "to receive complaints of misconduct from the public against an enforcement officer or against an enforcement agency in general

- 2.2. Several of the functions and powers include making recommendations, without outlining any follow up process to ensure that those recommendations are actioned, or clarifying whether they have any binding effect on the Government or PDRM.⁴ The IPCMC Bill 2019 does not explain the weight to be given to these recommendations, or what happens if the Government or PDRM disagrees with or fails to implement them.
- 2.3. In the past, the authorities have often chosen not to implement recommendations from other agencies, if compliance or follow up was not required. For example, a number of recommendations from the Human Rights Commission of Malaysia (SUHAKAM) in 2016 on improving conditions in lock-ups have still not been implemented.⁵
- 2.4. We recommend that a clear follow up process is included in the IPCMC Bill 2019, such as a requirement for the Government or PDRM to respond to the recommendations within a set timeframe, detailing any actions taken or proposed as a result of the recommendations, and a timeline detailing implementation.⁶ The details of the PDRM or government response to the recommendations should be recorded and published, as in other jurisdictions. For example, the Independent Office for Police Conduct (IOPC) in England and Wales makes recommendations which are published, along with the police forces' responses, every year on their website.⁷

and to investigate into and conduct hearings on such complaints". The RCI Report also listed the first function of the proposed IPCMC "to receive and investigate complaints about PDRM and its personnel", see Recommendation Twelve, page 189 of RCI Report.

⁴ For example, Clause 4(d) to advise the Government and make recommendations on appropriate measures to be taken in the promotion of integrity within the police force; Clause 5(2)(d) to visit any place and premises such as police stations, police quarters, lock-ups and detention centres and to make any necessary recommendations.

⁵ SUHAKAM, 'Deaths in Custody: A Thematic Study on Lock-Up Conditions and Factors Contributing to Death', 2016 made recommendations on issues including lock-up management, infrastructure, medical facilities and the use of force, <https://www.suhakam.org.my/3567-2/>.

⁶ Such a model is used in the UK following a coroner's report, see Coroners (Investigations) Regulations 2013. The Independent Office for Police Conduct in England and Wales also has the power to issue guidance to the police, who must have regard for that guidance when performing duties, see Elected Local Policing Bodies (Complaints and Misconduct) Regulations 2012.

⁷ See IOPC website, <https://www.policeconduct.gov.uk/investigations/investigation-summaries-and-learning-recommendations>, and the IOPC Annual Report and Statement of Accounts 2018/19, page 21, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/820239/IOPC-Annual-Report-2018-19.pdf.

- 2.5. Finally, we have concerns about the delegation of functions or powers of the Commission to any member of the PDRM, as allowed by Clause 13(c). We do recognise the importance of having expertise but this clause must either be amended or accompanied by an explanatory note, clearly stating which powers, and in which circumstances, they can be delegated to a member of the PDRM.

3. Appointment of Members of the Commission (Clauses 6, 7)

- 3.1. We welcome the increase in the number of Commissioners from seven, in the EAIC Act and the 2005 Bill, to ten. However, we recommend a change to the system of appointments and revocation of appointments.
- 3.2. Rather than members of the Commission being appointed by the Yang di-Pertuan Agong (on advice by the Prime Minister), as outlined in Clause 6(1), the appointments should be made following an open, transparent selection process with objective criteria. Members should come from a diverse range of backgrounds and representative of society.
- 3.3. Ideally, the appointments will be reviewed by the Major Public Appointments Parliamentary Select Committee (PSC). We acknowledge that the PSC is not yet fully operational but recommend that it is used for appointments to the Commission in future.
- 3.4. We are concerned that Clause 7(4) gives the Agong the authority to revoke the appointment of any member of the Commission at any time, without reason. A duly appointed Commissioner should only be removed for cause, such as conviction of an offence, misconduct, conflict of interest, or incapacity, and by due process rather than the discretion of the Agong.⁸

4. Scope of Misconduct (Clause 22)

- 4.1. The scope of misconduct includes, at Clause 22(b), among other things, the “non-compliance of rules and standard operating procedure of the police”. This provision would be acceptable, save for the fact that the standard operating procedures (SOPs) are not consistently made available to the

⁸ For example, the Police Act 1996 in British Columbia, Canada allows for resignation, suspension or removal of a commissioner only by resolution of two thirds of the legislative assembly, for cause or incapacity.

public. If members of the public do not have access to the SOPs, it is impossible for anyone to identify non-compliance and report misconduct.

- 4.2. Furthermore, Clause 22(2) states that misconduct shall not include any act regulated under sections 96 and 97 of the Police Act 1967. These provisions of the Police Act govern Police Regulations and Inspector General's Standing Orders (IGSOs), which can include the general control, direction and information relating to PDRM and all police bodies. As IGSOs cover everything from daily conduct, to uniforms, to the use of firearms, this provision effectively excludes almost all police matters from being considered misconduct.
- 4.3. IGSOs are currently classified under the Official Secrets Act 1972, and it is our experience that some senior police officers keep them under lock and key, due to their classified nature. This means that members of the public and potentially members of PDRM themselves will be unable to distinguish which actions or inactions may come under the scope of misconduct.
- 4.4. We recommend that Clause 56 of the 2005 Bill is replicated in this legislation, stating that all provisions relating to secrecy in any Acts of Parliament shall not apply to the divulging of information or the production of any document or other thing, pursuant to a requirement made by or under this Act.
- 4.5. The whole of Clause 22 is flawed and contradictory. As a first step we recommend that, in line with international standards and practices, SOPs and IGSOs of the police are released to the wider public.⁹ If absolutely necessary, confidential or sensitive information can be excluded or redacted, with adequate justification. We also recommend that acts regulated by IGSOs are not excluded from the scope of misconduct as this would mean, in practice, the culture of impunity in the police would continue.
- 4.6. We seek clarification as to what level of misconduct will be investigated by the IPCMC, what will be considered minor enough to be investigated internally by the PDRM and how such determinations will be made.

⁹ For example, the Vancouver Police Department's Regulations and Procedures Manual is available to the general public online, excluding only confidential material, <https://vancouver.ca/police/organization/planning-research-audit/regulations-procedures-manual.html>. A number of Standard Operating Procedures of the Metropolitan Police in London are available to the general public, while others have been released following Freedom of Information requests, <https://www.met.police.uk/foi-ai/af/accessing-information/published-items/?q=>.

- 4.7. The EAIC Act contains a provision at Section 24(2) ensuring that if the misconduct is committed by an officer along with someone else who is not enforcement personnel, or the incident occurs while the officer is off duty, the Commission would still have jurisdiction over the complaint. An equivalent clause in the IPCMC Bill 2019 would add strength to its definition of the scope of misconduct.

5. Complaints Committee and the Classification of Complaints (Clauses 23, 25)

- 5.1. Clause 23 states that the Commission shall establish a Complaints Committee. We recommend that, as in Section 16 of the EAIC Act, the provision goes on to set out the duties and functions of the Complaints Committee so that the extent and limitations of its role are clear.¹⁰
- 5.2. The powers given to the Complaints Committee appear to be very broad and too vague. For example, according to Clause 25(a), where the complaint involves an offence under Part IV of the Malaysian Anti-Corruption Act 2009, the Complaints Committee shall refer the complaint to the Malaysian Anti-Corruption Commission (MACC). But it does not define what form this referral should take and whether it means the Commission's own investigation continues simultaneously.
- 5.3. We recommend that when the Complaints Committee decides to refer to another authority their decision must be accompanied by a report, including the grounds for their findings and a recommendation that the Commission makes the referral. This would reflect the system in the EAIC Act and ensure that the Complaints Committee has appropriate limitations and checks on its powers.
- 5.4. It should be made clear in Clause 25 that a decision to refer a matter to another authority does not mean that the Commission ceases their involvement in the case. This would be of particular concern if a case was referred to the Attorney General's Chambers for criminal proceedings, as this would involve further investigation by the police, who would then be effectively investigating themselves. Such a scenario would undermine the whole point of the Commission's existence. Professional misconduct is not

¹⁰ Section 16 of the EAIC Act states the Complaints Committee has duties and responsibilities including, for example, to keep and maintain a register of all complaints received, to conduct any preliminary investigation, and to inform the complainant of the status of their complaint.

the same as a criminal charge and does not carry the same standard or burden of proof.

- 5.5. For example, a person may not be found guilty of a criminal charge for many reasons, from poor investigation or prosecution, to a lack of willingness among fellow officers and witnesses to testify against the police. But in the same case, there may still be enough evidence to investigate and prove misconduct.¹¹ We recommend that Clause 25 is amended to ensure that a referral to another authority on a particular issue does not preclude the Commission from carrying its own or simultaneous investigation into the alleged misconduct.
- 5.6. Guidance on the interpretation of these provisions would also be necessary, for example, on what qualifies as “frivolous, vexatious”, “too remote a time to justify an investigation”, and “alternative and satisfactory means of redress” under Clause 25(d). These are too vague and open to abuse if interpreted without clear guidance or definition.
- 5.7. We have concerns that Clause 25(d)(iv) in particular could be interpreted too broadly. The fact that the subject matter “has been finally determined by any court or is the subject matter of any proceedings pending in court” should not preclude a misconduct investigation by the Commission. A person may not be found guilty of a criminal offence but may still be responsible for professional misconduct and subject to appropriate disciplinary action from the Commission.
- 5.8. The case of Dharmendran Narayanasamy is a clear example of this. Despite the police claiming that he died in custody following breathing difficulties, the post-mortem revealed cause of death to be diffuse soft tissue injuries due to multiple blunt force traumas. He was found to have 52 different injuries including stapler bullets in both ears. Four police officers were charged with murder but were subsequently acquitted. Yet, the EAIC investigation revealed the depth of the police cover-up, including fabricated entries in lock-up diaries, false content in police reports, delays in investigation and communication with the family.¹² This goes to show that an independent misconduct investigation is crucial in uncovering the truth

¹¹ See case of Dharmendran Narayanasamy outlined in paragraph 5.8 of these Recommendations, and LFL’s Report ‘5 Faces: A Story of Police Custodial Deaths in Malaysia’, 2018.

¹² For more on this case and similar examples, see LFL’s Report ‘5 Faces: A Story of Police Custodial Deaths in Malaysia’, 2018.

and breaking down the “blue wall of silence”, regardless of whether a case has been investigated or charged as a criminal matter.

- 5.9. We recommend that a further section is added to Clause 25 to outline the actions the Commission will take after the Complaints Committee’s findings, as in Section 27 of the EAIC Act. This should include, for example, to notify the complainant of the findings, the reasons for those findings and the next steps. If the Commission agrees that the complaint should be referred to an external authority as well, it should request a report from that authority within set time frame, such as within 30 days of the referral.

6. Investigation Powers (Clauses 26, 27, 29)

- 6.1. We note the inclusion of the powers to examine persons and to obtain documents and other things. However, the EAIC has greater powers and those should be mirrored in the IPCMC Bill 2019. For example, the Commission should have the power to conduct public hearings, summon witnesses to meetings or hearings, issue warrants of arrest to compel a person’s attendance, examine and cross-examine witnesses and search premises with a warrant.
- 6.2. We welcome that the Commission has the power to establish a Task Force to assist with an investigation under Clause 29, and that such a Task Force would have all the powers of investigation as contained in the Criminal Procedure Code. However, we recommend that the Commission possess the powers of the Criminal Procedure Code whether or not a Task Force has been established.
- 6.3. We also recommend that all hearings are open to the public and the outcomes published, as provided in the EAIC Act and and as seen in other jurisdictions.¹³
- 6.4. Both the EAIC Act and the 2005 Bill include the right to legal representation for the person under investigation and any person giving evidence at the hearing. This should be included in the IPCMC Bill 2019.

¹³ For example, the outcomes of misconduct hearings of the Metropolitan Police in London are available to the public and published online, <https://www.met.police.uk/foi-ai/af/accessing-information/published-items/?q=>. Outcome reports can be redacted or anonymised if necessary due to sensitive information or other legitimate reason, as with the IOPC investigation reports in England and Wales, <https://www.policeconduct.gov.uk/investigations/our-investigations>.

7. Proceedings to Deal with Misconduct (Clauses 31, 32)

- 7.1. We commend that the IPCMC Bill 2019 grants disciplinary powers to the Commission to impose punishment for misconduct including provisions for a fine, reduction of salary, reduction in rank, and dismissal. This is a necessary step, given the history of mistrust of the PDRM, to ensure that the Commission will be taken seriously and has real power to uphold and improve integrity in the force.
- 7.2. Clause 31 states that a Disciplinary Board shall be established to have jurisdiction over the discipline of any member of the police force who has committed misconduct. The Schedule shows that the Disciplinary Board will consist of a member of the Commission as Chairman, two further members of the Commission, the IGP and a representative of the Police Force Commission.
- 7.3. Malaysia has had historical issues with the centralised power of IGPs in the past, with many complaints made against previous holders of this office who had been instrumental in protecting the government and police officers involved in corruption and misconduct.¹⁴ As previous IGPs have been involved in acts of misconduct and maintaining the culture of impunity, it is not appropriate for the IGP to sit on the Disciplinary Board. We suggest the IGP be replaced on the board by another member of the Commission or the Police Force Commission.
- 7.4. In the event of the IGP being investigated for misconduct, there are few details how the Special Disciplinary Board will hear the complaint. Clause 31(4) merely states that the Special Disciplinary Board shall be established by the Chief Secretary to the Government, who is not a member of the Commission. This raises a question about the independence of the Special Disciplinary Board and whether it would come under the jurisdiction of the Commission and this legislation at all.

¹⁴ For example, then Selangor Police Chief (later IGP) Khalid Abu Bakar was involved in subverting the criminal investigation into the death in custody of Kugan Ananthan in 2009, convincing the Attorney General to limit the investigation to Section 330 of the Penal Code (voluntarily causing hurt to extort confession) rather than Section 302 (murder). In the same case, Khalid gave misinformation to the media about the death. IGP Khalid was also instrumental in diverting investigations into the 1MDB scandal and was criticised for delays in the investigations of the discovery of mass graves in Wang Kelian.

- 7.5. It is essential that the Commission has jurisdiction over misconduct committed by any member of the PDRM, including the IGP.¹⁵ It is important that the Commission has the same powers to investigate and discipline someone of this rank as any other police officer. It is necessary for this provision to be amended or assurance given that the Special Disciplinary Board will be independent from any authority but the Commission itself.
- 7.6. We further suggest an amendment to the wording of Clause 32, which we believe contains an error. This clause currently states that the Disciplinary Board may, “upon considering the findings under section 28 *and* upon completion of an investigation under section 30, conduct proceedings to deal with misconduct”. We suggest changing the wording so that the Disciplinary Board may conduct proceedings on the basis of findings under section 28 *or* upon completion of an investigation under section 30.

8. Contempt (Clause 35)

- 8.1. The contempt clause and the definition of an “act of contempt” under Clause 35 are too wide and leave the provision open to abuse. Comparing to other jurisdictions, some independent police oversight bodies do not mention contempt at all,¹⁶ whereas others do, but have a narrower definition of contempt.¹⁷
- 8.2. We recommend removing “any act of disrespect or any insult” to a member of the Commission “at any time and place”. This is too far reaching and is likely to have a chilling effect on freedom of speech. For example, if any member of the public or civil society organisation wished to comment on or criticise a decision of a Commissioner, they may fear serious consequences under the current contempt provision. This provision should be limited to actions which impede or obstruct proceedings, or threaten members of the Commission on account of them acting within their capacity as a Commissioner.

¹⁵ For example, the Calgary Police Commission in Canada specifies that its jurisdiction is not just over the police force in general but also over complaints made against the Chief of Police, <https://www.calgarypolicecommission.ca/complaints.php>.

¹⁶ For example, the IOPC in England and Wales, <https://policeconduct.gov.uk/>.

¹⁷ The Office of the Police Complaint Commissioner, British Columbia, Canada has contempt provisions, but the Supreme Court of Canada has defined contempt as “the open, continuous and flagrant violation of a court order”, *United Nurses of Alberta v Alberta (Attorney General)* [1992] 1 SCR 901. This is much narrower than the “disrespect and insult at any time” as provided for in the IPCMC Bill 2019.

9. Annual Report (Clause 41)

9.1. The annual reporting provision is generally positive, requiring reports to include all activities of the year including all matters referred to the Commission and the actions taken. We recommend that this requirement goes further, as in the 2005 Bill and in other jurisdictions, to provide more accountability. The Civilian Review and Complaints Commission of the Royal Canadian Mounted Police (RCMP), for example, publishes an annual report detailing, among other things, the percentage of their recommendations which were accepted and implemented.¹⁸ The 2005 Bill required the annual report to also detail the response of the IGP, police officers, other relevant authorities and the Public Prosecutor to the Commission's findings and recommendations.¹⁹

10. Responsibility to Refer Cases of Grievous Hurt or Death in Custody (Clause 47)

10.1. The specific mention of cases of grievous hurt or death in custody is a positive addition to the IPCMC Bill 2019. This is essential, given the history of police brutality and deaths in custody in Malaysia, marred by a culture of impunity, cover-ups, falsified records and very few disciplinary or criminal consequences for the officers involved.²⁰

10.2. However, this provision must go further to include serious harm or death caused during or following any police operations, whether or not in custody. We refer to the IOPC in England and Wales, which by law must investigate any incident of injury or death during or following police contact, whether that contact was direct or indirect.²¹

10.3. A quick response and referral to the Commission is crucial in such cases. In the past, the PDRM have tampered with evidence and even made false allegations against victims in an attempt to justify the improper use of force. For example, police officers claimed that the three young persons fatally shot at Glenmarie, Shah Alam were threatening them with weapons, which was in conflict with the post-mortem reports, and the then Selangor police

¹⁸ Annual Report 2017-2018 of the Civilian Review and Complaints Commission of the RCMP, <https://www.crcc-ccetp.gc.ca/en/annual-report-2017-2018>.

¹⁹ See Clause 76 of the 2005 Bill.

²⁰ See LFL's report, '5 Faces: A Story of Police Custodial Deaths in Malaysia', 2018

²¹ Section 12, Police Reform Act 2002. Also see IOPC website, www.policeconduct.gov.uk

chief Khalid Abu Bakar, who later became IGP, made false allegations that 14-year-old Aminulrasyid Amzah, who was shot and killed during a car chase, was carrying a parang. Some jurisdictions with a history of mistrust in the police have gone so far as to have an independent senior investigator for the misconduct authority on call 24/7 to respond at the scene of a death in custody or police shooting.²²

- 10.4. We recommend that Clause 47 is extended to require the police to refer any incident which has resulted in grievous hurt or death of a person during or following any sort of contact with the police, whether or not in custody. We recommend a timeframe for such referrals, which should be made to the Commission immediately or not exceeding 24 hours of the grievous injury or death.

11. Power to Amend Schedule and Regulations (Clauses 49, 50)

- 11.1. Under Clauses 49 and 50, the Prime Minister alone has the power to amend the Schedule to the IPCMC Bill 2019, which currently details how the Disciplinary Board is formulated, and to make regulations giving effect to the provisions of the Act. This includes the procedure for handling complaints and the procedure for misconduct proceedings, some of the most substantive parts of the legislation. This gives too much power to the Prime Minister to act alone, potentially changing the nature of the Commission substantially.
- 11.2. The Commission itself should have the power to amend the Schedule and Regulations, if necessary, with Parliamentary oversight.

12. Further Recommendations

- 12.1. The Commission must give reasons for its decisions and must have an appeals or complaints process itself, to ensure accountability, transparency and trust in the system. For example, the Commonwealth Ombudsman, responsible for complaints against the Australian Federal Police, offers a right to review their decision if a request is made within three months.²³ The

²² For example, the Police Ombudsman of Northern Ireland has a 24/7 emergency response investigator on call, see <https://www.policeombudsman.org/Information-for-Police-Officers/When-you-must-contact-the-Police-Ombudsman-s-Offic>.

²³ The Commonwealth Ombudsman covers the community's interactions with various Australian government agencies, including the Australian Federal Police, <https://www.ombudsman.gov.au/what-we-do/frequently-asked-questions>.

Police Ombudsman for Northern Ireland allows complaints to be made about its own investigations, processes, delays or alleged discrimination if a request is made within 12 months.²⁴ To ensure public trust in the Commission, we recommend that a further complaints or appeals process be included in the IPCMC Bill 2019.

- 12.2. Finally, we urge the government to consider introducing a mechanism whereby civil society organisations can raise concerns on behalf of the public about harmful patterns or trends in policing. These types of strategic complaints have recently been introduced in England and Wales.²⁵ These would not be an alternative to individual complaints, but a useful tool to raise broad and systemic concerns that could affect public confidence in the police.

²⁴ See <https://www.policeombudsman.org/About-Us/How-to-complain-about-the-Police-Ombudsman-s-Office> and <https://www.policeombudsman.org/PONI/files/94/94f4e4f2-014f-448b-9eea-6654f89793a9.pdf>.

²⁵ See <https://www.policeconduct.gov.uk/complaints-and-appeals/super-complaints-and-working-other-policing-oversight-bodies>.