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NOTE

From:	BE, DE, ES, FR, IT, AT and SI delegations
To:	Law Enforcement Working Party
No. prev. doc.:	12865/13
Subject:	Proposal for a Handbook of best practices for the self-assessment of law enforcement forces to prevent corruption and enhance integrity

Law enforcement authorities are the cornerstone of the fight against corruption, so their integrity is fundamental. Like all organisations, however, they are vulnerable to corruption and their powers also make them potential targets. While the focus is generally on detecting internal corruption, it is very important to undertake preventive action. Moreover, corruption is combatted not only by detecting individual faults but also by detecting organisational and process vulnerabilities.

Against this background, on 30 July 2013, the FR delegation tabled a proposal for the drafting of a Handbook of best practices for the self-assessment of law enforcement forces (12865/13), which was presented at the LEWP meeting on 11 October 2013. The meeting agreed that the FR delegation would work together with Member States which were willing to appoint their experts in order to finalise the document.

The meeting of experts took place on 28 January 2014 at the FR Permanent Representation to the EU in Brussels, and involved experts from seven Member States, namely Belgium, Germany, Spain, France, Italy, Austria and Slovenia. The experts finalised the text of the draft handbook as set out in the annex to this document.

The purpose of this handbook is to provide a framework for evaluating the weaknesses and the vulnerability of a law enforcement authority in terms of the integrity of its organisation and its members. In the list of the best practices as regards self-assessment with a view to preventing corruption and enhancing integrity, eight fields have been identified:

- (1) Recruitment;
- (2) Staff regulations and career development;
- (3) Training;
- (4) Organisation of the law enforcement force;
- (5) Hierarchical supervision;
- (6) Upper-level internal control;
- (7) Possible conflict of interests for law enforcement officers as a second job, elective mandates;
- (8) Remedies available to the general public.

The draft handbook includes a set of evaluation questions for each of these fields.

This draft handbook is consistent with the United Nations Convention against Corruption, and in particular Chapter III thereof "Criminalization and law enforcement", with the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (limited relevance; Articles 1 and 5), and with Resolution (97)24 of the Committee of Ministers of the Council of Europe "Twenty guiding principles for the fight against corruption", and finally with the Transparency International report "Building integrity and countering corruption in defence & security". Moreover, this draft should be read with due regard for the Commission's first EU Anti-corruption report published on 3 February 2014.

It is proposed that the Handbook, if approved, would become available to every law enforcement service for self-assessment aiming to identify possible breaches in terms of the integrity of the law enforcement forces. It would also contribute to promoting the exchange of best practices between them. It would not be a binding instrument, but rather a preventive tool to be promoted through a pedagogical approach.

On this basis, delegations are invited to discuss and approve the draft Handbook, and to encourage its use by all law enforcement authorities for self-assessment with a view to preventing corruption and enhancing integrity.

HANDBOOK
FOR THE SELF-ASSESSMENT OF LAW ENFORCEMENT FORCES
TO PREVENT CORRUPTION
AND ENHANCE INTEGRITY

Corruption destroys the role of police in society, damages the trust of the community and jeopardises democracy. That is why it is essential to determine whether law enforcement services are performing their tasks with integrity.

Combating corruption is achieved not only by detecting individual faults, but also by identifying organisational and process-related vulnerabilities. The management and culture of law enforcement services are indeed crucial factors influencing police behaviour. Those services must therefore have a clear vision in terms of integrity, translated into a policy which should be written down and communicated to individuals within the organisation.

The following handbook provides a framework for identifying possible weaknesses of law enforcement services in terms of their integrity in order to evaluate the vulnerability of their organisation and members.

For the purposes of this handbook, the term "law enforcement authorities" refers to all public, quasi-public and private bodies involved in State security, and whose agents are vested with authority and coercive power over any person on State territory.

It also seems essential to define integrity as a concept of consistency of actions, values, methods, measures, principles, expectations and outcomes as regards both legal requirements and ethical standards. "Integrity" here means the permanent compliance of the behaviour of individual police officers with police objectives, values and principles in such a way as to resist any temptation to abuse their institutional powers within society, as well as within their organisation, for the purpose of unlawful gain.

In this respect, any law enforcement authority should have a charter or a code of conduct to which its members can refer in their decision-making processes.

The purpose of this document is to provide a framework for evaluation based on eight separate fields which have been identified as crucial as regards the concept of integrity:

- 1) Recruitment;
- 2) Staff regulations and career development;
- 3) Training;
- 4) Organisation of the law enforcement authority;
- 5) Hierarchical supervision;
- 6) Upper-level internal control;
- 7) Possible conflict of interests for law enforcement agents as a second job, elective mandates;
- 8) Remedies available to the general public.

There is a set of evaluation questions for each of these fields.

1) Recruitment of law enforcement officers

A sound law enforcement authority which is unlikely to be corruptible has to ensure that it has high-quality recruits. The recruitment process has to be fair and impartial, and has to include at least one anonymous test. The service in charge of recruiting law enforcement officers has to gather all the information necessary before making a decision. Starting with intellectual and physical selection, the most useful information relates to the candidates' past experience, their fundamental personal qualities and their hidden flaws. All this information has to be identified and recorded in the candidate's file. It is advisable to assign responsibility for the decision to a high-ranking officer who heads a specialised recruitment service; it must be possible to appeal against the decision before a court.

Questions for evaluation

- Does the recruitment campaign identify the attitude expected from candidates?
- Does the selection process guarantee that the recruitment is fair, impartial, and integrity-based (objective criteria, transparency, deadlines etc.)?
- Are the selectors responsible for recruitment made aware of the need to comply with the principle of integrity?
- Are there procedures in place to monitor the compliance of the recruitment process with the principle of integrity (and consequently, the absence of any form of influence on the selectors)?
- Does the selection include at least one anonymous test?
- Is the candidate's moral background checked?
- Is the candidate's criminal record checked?
- Are these background checks included in the candidate's "recruitment" file, even if they reveal nothing negative?

- If the background checks reveal negative information about the candidate, at what level is the decision made to reject or approve a candidate's application?
 - at national headquarters?
 - at regional headquarters?
 - at local headquarters?
 - by a body separate from the law enforcement authority?
- During recruitment:
 - do candidates undergo tests that reveal their moral values?
 - do candidates undergo personality tests?
 - do these tests enable the recruiters to assess a candidate's level of risk of being influenced?
 - do these tests enable the recruiters to assess a candidate's susceptibility to corruption?
- Is it possible to appeal against the decision arising from the selection process?

2) Staff regulations and career development

It is essential to guarantee protective staff regulations stipulated in a high-level judicial text.

Career development is ensured by means of transparent procedures that provide for a merit-based promotion system. The organisation makes provision for job mobility on both a functional and a geographical level. Protective mechanisms are in place both for officers who are victims and for those accused of wrongdoing. There is a system for assisting officers who are under strain (either through their professional circumstances or due to mental or physical health difficulties). In the event of misconduct or omission, there is a formalised disciplinary procedure which is fair, impartial and transparent and which also provides channels for appeal and redress. The bodies responsible for investigation and decision-making are completely separate. At each stage of the procedure, the rights of the accused are safeguarded. Sanctions are proportionate to the misconduct committed. However, law enforcement officers deserve public recognition from society and from the law enforcement authority in cases where they have displayed exemplary behaviour in the performance of their duties. They can be rewarded in order to encourage them to continue to display such exemplary behaviour in the exercise of their professional responsibilities and, at the same time, to encourage their colleagues to do the same.

Questions for evaluation

Re staff regulations:

- Are staff regulations of law enforcement officers defined at legislative level?
- Do staff regulations define the entrance requirements and recruitment methods?
- Do staff regulations define the roles and responsibilities of each level of the hierarchy?
- Do staff regulations provide for a pay scale that gives law enforcement officers a remuneration package which is at least comparable to the average salary of employees in similar socio-professional categories?

- Do staff regulations provide for a retirement pension that ensures a satisfactory standard of living?
- In the event of death or injury in the line of duty, are the officer, the surviving spouse and the family adequately protected? In the event of death during retirement, is the surviving spouse entitled to a survivor's pension?

On career development:

- Is integrity a criterion in the evaluation process?
- Are the committees responsible for staff assessment made aware of the importance of complying with the principle of integrity?
- Are the evaluation, appointment, promotion and transfer procedures organised clearly and transparently? Are the criteria for those procedures sufficiently well defined? Is it possible to appeal to the management and / or to institute legal proceedings?
- Is there a procedure for monitoring the extent to which the aforementioned procedures take account of integrity in the merit assessments? Are the procedures monitored by management committees, including employees?
- Does the career structure provide for a minimum duration of service in each rank?
- Is account taken of rank and length of service when making appointments to positions of responsibility?
- Are the promotion decisions based on merit, professional experience and skills? Are they taken unilaterally by line management?
- Are external assessors (e.g. union representatives, judges, prosecutors or academics, etc.) included in the collegiate bodies responsible for evaluating candidates to be promoted?

Re functional and/or geographical mobility:

- Is functional and/or geographical mobility compulsory? Does this apply only to managerial staff? Is it compulsory in the case of a promotion?

Re the protection afforded to law enforcement officers:

- Are law enforcement officers regarded as agents of authority and protected from possible attacks/ insults/ disobedience on the part of the public?
- If a law enforcement officer is killed or injured in the line of duty, is functional protection available? Under what circumstances?
- If a law enforcement officer is accused of wrongdoing, is functional protection available? Under what circumstances?
- Is legal counsel made available, in particular if a case is brought before the courts?
- Are there measures providing for suspension from the service?
- Are there measures for suspending pay?

Re medico-social welfare benefits:

- Do law enforcement officers have access to regular medical check-ups throughout their career?
- Is their salary guaranteed (on either full or partial pay) throughout periods of sickness?
- Does the law enforcement authority make a team of psychologists available to officers?
- Does the law enforcement authority make a team of social workers available to officers?

- Are managers made aware of this kind of issue?
- Is provision made for implementing an occupational health and safety risk management system within the law enforcement authority structures?

Re disciplinary proceedings:

- Is provision made for an administrative inquiry in which the parties are duly heard?
- Can an officer subject to an administrative inquiry be assisted by a third party (e.g. a lawyer)?
Can an officer subject to a disciplinary inquiry be assisted by a third party (e.g. a lawyer)?
- Is provision made for disciplinary proceedings to punish officers who have committed a wrongful act?
- Is provision made for imposing disciplinary and administrative sanctions on officers who have committed a wrongful act that is not covered by the Penal Code?
- If a law enforcement officer is subject to a definitive sentence for a crime, does this automatically trigger disciplinary proceedings?
- Are the most serious cases of misconduct brought before a collegiate body? If such a collegiate body does exist, does it include representatives of police staff unions or representative organisations?
- Are there rules in place to ensure that the members of the disciplinary panel (where such a collegiate body exists) are unbiased and possess the requisite degree of knowledge of the applicable rules?
- Where a collegiate body proposes a sanction, does it include the peers of the officer accused of wrongdoing?
- Is there a scale of sanctions? Is the sanction proportionate to the gravity of the wrongdoing and consistent with the sanctions imposed on other police officers in similar circumstances?

- Is there a system in place to limit or prevent the deciding body from increasing or reducing the sanction proposed?
- Is the officer entitled to appeal against the sanction? Via the management structure? By means of litigation?
- Is an overview available of all the decisions taken in the field of disciplinary proceedings?

Re recognition:

- Is integrity in behaviour in the organisation duly recognised?
- Is any special provision made for outstanding performance?

3) Training

Training is a key factor for ensuring the high quality of law enforcement officers.

Such training must be provided by appropriately trained trainers. It has to impart the values essential to law enforcement services, such as integrity, a sense of public service, rigour and incorruptibility. These moral values must be published in a key document such as a charter or code of conduct. The internal regulations must provide for disciplinary and professional sanctions for breaking the law and impairing the quality of services. The law must make provision for harsher sentences for crimes committed by law enforcement officers in the course of performing their duties. Appropriate manuals and guidelines shall be supplied/made available to all police staff.

Taking an oath to abide by the law is a key element in the commitment given by young law enforcement officers.

In addition, the most experienced officers have to be made aware of their role in terms of setting an example for - and imparting the values of integrity to - young recruits.

Questions for evaluation

- Does the law enforcement authority to which the trainee belongs have a charter or code of conduct?
- Does this charter or code of conduct include provisions making it clear to officers that their private behaviour must not impair the image of the law enforcement authority?
- Is a copy of this charter or code of conduct given to trainees?
- Is this charter or code of conduct studied in term of its application and its significance for daily work during the training course?
- Is the choice of trainers based on their integrity as well as their professional knowledge?
- Do the trainers attend an awareness-raising course on integrity issues while at the police school?

- Are they made aware of their role as promoting the values of integrity within the police force?
- In general, does the initial and in-service training include courses, discussions or debates aimed at reinforcing the integrity of the trainees?
- Is the trainees' behaviour evaluated during the training course?
- Does the training course include a study of the mechanisms for disciplinary, professional and judicial sanctions for law enforcement officers?
- Are non-law enforcement trainers included in the training staff of law enforcement academies?
- Are manuals and guidelines describing all the required behaviour / regulations / rules / examples of misconduct / sanctions for police officers supplied or made available to all police staff?
- Are the candidates interviewed and marked at the end of their initial training period by an examination committee which evaluates their moral values?
- At the end of their initial training course, do the trainees take an oath or undertake to respect the moral values of the law enforcement authority?
- Is training on integrity, adapted to their professional activities, given to officers throughout their career?
- Is specific training given systematically in cases where an officer:
 - moves from one department to another?
 - moves to a different kind of activity?
 - has been promoted?
 - is complying with functional mobility rules?
 - is complying with geographical mobility rules?

- Has specific training been designed to prepare a candidate to take on leadership responsibilities?
- Is the training role of the most experienced officers in terms of transmitting the values of integrity to young recruits encouraged and recognised?
- Is guidance provided to young officers as regards the transmission of integrity values?

4) Organisation of the law enforcement authority

Each service must be organised in such a way as to leave officers little scope for becoming susceptible or vulnerable to corruption. This applies from the management level (e.g. the budget level) to the basic level. Each service must provide appropriate equipment to accomplish its mission. The risk of corruption related to a regular presence in a certain environment can be prevented by a clearly identified leader, the traceability of activities, a varied shift schedule, a varied location of duties and the haphazard grouping of officers. For example, being proficient in a foreign language in tourist areas or places where large numbers of foreigners gather must not be a reason for choosing to post certain officers consistently in these particular locations.

Cash collections must be particularly well monitored by regulations and strict procedures in order to prevent embezzlement and discourage officers from seeing a personal interest in this type of operation.

Questions for evaluation

Organisational structure

- Are there procedures in place for the designation of public procurements and contract management?
- Does each service provide the officers with appropriate equipment to accomplish their missions?
- Do law enforcement officers in contact with the general public sometimes work alone?
- When several officers are working, is one of them clearly designated as team leader?
- Are teams permanent?
- When officers are appointed to a service:
 - Do they receive guidelines-regarding their missions?
 - Is it mandatory for them to report?

- Apart from arresting criminals caught in the act, can law enforcement officers decide for themselves what law enforcement actions to carry out and where this will be done?
- When officers are posted to public security duty, do they always work in the same district or the same neighbourhood?
- When officers are given the task of policing a border crossing point, e.g. a border checkpoint in an airport:
 - Is it possible for them to always work on the same shift?
 - Is it possible for them to always work in the same place?
- Are officers obliged to issue a receipt in cases where they are allowed to collect cash by way of payment of fines for certain misdemeanours?
- In cases where officers are allowed to collect cash:
 - Is the receipt given to the offender securely traceable: block with duplicates, numbered in series...?
 - Does the receipt mention how and where to seek redress?
 - Does the receipt contain details of the identity and the address of the offender?
 - When cash is handed in to the collecting department, is the amount properly checked? Are the receipts marked as paid in?
 - Does the department in charge of collecting cash hand out the blocks of receipts to the officers or to their services?
 - Is there any procedure for verifying the correct use of and auditing the blocks of receipts when they are returned to the department responsible for collecting cash?

Organisational culture

- Is the policy of integrity incorporated into the regular discourse of the organisation (internal/ external/ informal communication)?
- Are the leaders aware of their responsibility to maintain integrity as a topic in internal daily communication? Are the leaders aware of their important role as a model for appropriate behaviour?
- Are there contact points to which officers can refer in confidence in the event of any ambiguous questions/ dilemmas with regard to the integrity policy?

5) Hierarchical supervision

Hierarchical supervision is of considerable importance for the trustworthy running of a law enforcement authority. The exemplary role played by the leaders is the basis on which their authority is accepted. Supervision must reach every area of the institution, and particularly those where an officer's authority can be used for unlawful purposes or those where action or inaction may have an effect as a result of lenience or abuse of authority.

5.1) Follow-up to and archiving of investigative proceedings and exhibits:

Investigative proceedings must be recorded and preserved in such a way that it is impossible to delete or modify them in whole or in part. The same goes for items that are exhibits.

Questions for evaluation

- Are investigation proceedings - whether in paper or electronic form - entered in a register as soon as a case is opened?
- Is there a register for validating the opening of investigative proceedings and ensuring that the work done is preserved indefinitely?
- Is there a day book that records how cases evolve?
- Is this day book updated when any new part of the proceedings is carried out or any exhibit collected?
- Is there a mechanism for preventing the destruction or 'disappearance' of a part of the proceedings or of an exhibit?
- If there is no such mechanism, is it possible to detect that a part of the proceedings or an exhibit has 'disappeared'?

- In the case of electronic proceedings, can they be accessed by the investigator, by one of his colleagues or by a third party?
- Is it possible to identify who has had access to electronic proceedings?
- In the case of electronic proceedings, can the investigator, one of his colleagues or his team leader delete the proceedings in full or in part?
- Is it possible to identify who performed a deletion?
- Is it possible for IT technicians to destroy part of the proceedings?
- In the event of mishandling (e.g. in connection with archiving or a misplaced file), is it possible to identify who was responsible for the incident?
- In cases of an error justifying an intervention in the register, is such rectification documented by a due process in respect of which both the person responsible for the error and the person who rectifies the error have an opportunity to submit their observations on the incident in question ?
- Is there a part of the proceedings that lists the exhibits?
- Apart from this list, is there a register that identifies the exhibits kept in a service, links them to a certain case and contains a record of their movements?
- Is access to exhibits subject to security measures? Do both sides to the case have access, and is access recorded in the register?
- Are the proceedings checked by the investigator's superior before being sent to the judicial authority?

5.2) Security measures governing access to general information, intelligence and identification databases:

These databases may be used improperly by an agent for his own use or on behalf of a third party. The information contained in the databases can be of considerable interest, and can be misused for financial gain or illegal purposes. Moreover, it must be impossible for unauthorised persons to access databases by intrusion.

Questions for evaluation

- In general, is access to databases restricted to persons on the basis of professional needs?
- Generally speaking, is there a record of access to the databases containing details of the person who requested access (traceability of access to databases)?
- If a person makes a query through a third party, is there a record of their log-in and the reasons for the query?

5.3) Monitoring the service

The activities of each service must be monitored, with a view to checking both efficiency and proper conduct. The general principle is that team leaders must be in charge of monitoring the action of their subordinates. The team leaders may be subject to sanctions if they clearly fail in this duty.

Questions for evaluation

- Generally speaking, is monitoring their subordinates' day-to-day work part of the permanent duties of the first level of the chain of command?
- Is the first level of the chain of command likely to be sanctioned for failing to monitor?
- Is the first level of the chain of command assessed in terms of its capacity to monitor their subordinates?
- Does the first level of the chain of command have the means, time, vehicle, etc. available to monitor their subordinates?
- Are there rules providing for the regular monitoring of subordinate units by the chain of command?
- Are there rules providing for the random monitoring of subordinate units by the chain of command?

6) Upper-level internal control

Beyond hierarchical supervision, monitoring, inspection and investigation services must be placed at the highest level of the chain of command and external individuals must be allowed to play a part in their activities. Such upper-level internal control has to be performed by appropriately selected personnel. It must be possible for a person or an administrative or judicial authority to apply to them directly. They must be required to respond to such a request and to give an account of their activities to the administrative or judicial authorities depending on the type of misdemeanour concerned.

Questions for evaluation

- Is respect for the values of integrity taken into account in the choice of the staff to be employed for the internal controls?
- Are the controllers made aware of the integrity issues?
- Does the law enforcement authority have a service or a unit responsible for monitoring law enforcement services and staff?
 - with regard to its organisation and running?
 - with regard to work planning and the way in which law enforcement officers are deployed?
 - with regard to the strict enforcement of regulations?
 - with regard to their conduct and their relations with the public?
 - with regard to their private behaviour?
 - with regard to the way in which records are checked, in particular the follow-up to complaints and claims, and the way in which police inquiries and proceedings are carried out?
 - with regard to book-keeping concerning law enforcement officers' activities?

- do external individuals play a role in this service?
- can this service decide to conduct an investigation on its own initiative without being requested to do so?
- does this service organise controls on its own initiative?
- can the public approach this service directly?
- does this service have to be accountable for its activities? Can the head of this service be scrutinised by a parliamentary committee?
- If this audit service identifies an offence, is it bound to file a report:
 - to a law enforcement authority?
 - to a government authority?
 - to a judge or a judicial authority?
 - to a parliamentary committee?
- Where the law provides for an obligation to report a crime, is there an established procedure for reporting?
- Does this service draw up statistics on the offences committed by law enforcement officers in the exercise of their duty?
- Are these statistics and their analysis used for:
 - reinforcing controls?
 - adjusting work procedures to reduce the risk of offences being committed?
 - adjusting recruitment procedures?
 - adjusting training programmes?

- adjusting labour rules and regulations?
- adjusting control mechanisms?
- Is there an easily identifiable contact point for reporting crimes or breaches of integrity inside the institution?
- Is any information available about the rights of the person reporting allegations?
- Are there rules in place to protect the person from discriminatory action?
- Are there rules in place to protect anonymity or at least personal data?

7) Possible conflict of interests for law enforcement agents such as second job, elective mandates, etc

The impartiality of law enforcement officers is essential. It is desirable that law enforcement officers should have only one job since a second one may prejudice their availability and sometimes their integrity. It is therefore crucial to have a clear framework for any second job which must be subject to authorisation from the command chain and must not jeopardise the officer's integrity. Certain types of jobs must be banned, in particular those which bestow authority on officers in respect of people in public areas or spaces. The distinction between the jobs of law enforcement agent and private agent must be made crystal clear. In order to respect the separation of powers, officers should not be allowed to fulfill a public elective mandate. However, they do have the right to organise or participate in representative organisations.

Questions for evaluation

- If law enforcement officers are allowed to have a second job for extra income, are there any regulatory framework/ guidelines for such second jobs?
- Do officers have to ask for authorisation for a second job?
- Are any particular jobs banned?
- Are jobs relating to security tasks or private companies banned (e.g. security guards, premises supervisor, bodyguard, and jobs involving checking people and securing protected places)?
- Are police officers allowed to fulfill a public mandate?
- If police officers are allowed to fulfill a public mandate, are there any restrictions? If so, what are they?

- Do police officers have the right to participate in representative organisations (professional unions and/or associations and/or internal organisations) in order to defend and promote their rights and their professional, economic and social interests?
- Is there a gift policy in the organisation (rules/norms about the acceptance of gifts and gratuities, for example meals, trips, etc.)?
- Is there a post-public employment policy (mechanisms for preventing and managing conflict of interest after police officers leave the police organisation)?

8) Remedy procedures for the general public

All persons must be given an opportunity to warn the law enforcement authority in cases where they feel that an officer has acted irregularly in their relationship. All persons, whether they are members of the general public or internal to the organisation, must be entitled to apply for remedy before an independent body in order to denounce or complain about poor conduct or an offence committed by a law enforcement officer. This independent body must receive claims without any particular formality or fee. Members of this body must be appointed in such a way that they cannot be influenced. They are required by law to respond and publish activity reports. They must have the power to conduct inquiries and issue binding orders. They must refer any offences they discover to the judicial authorities.

Questions for evaluation

- Is information on remedy procedures actively made public and easily available (including the e-procedure) ?
- Is information about the status of an instituted remedy procedure readily available to the public?
- Has the internal control service of the law enforcement authority put into service one or more means allowing the public to submit a claim directly? Do the means implemented fully allow needs to be met in terms of recording and dealing with the claims?
- Is there an independent body responsible for receiving complaints about corruption, abuse of power or the poor operation of a law enforcement authority?
- Is it possible for people who wish to lodge a complaint or an application for redress to refer to an independent body directly and free of charge?

- Is this body required by law to:
 - respond?
 - act, either by conducting an inquiry or by requesting that one be carried out?
 - react within a certain period of time?
 - Regardless of the action taken, is this body required by law to report on the way it has dealt with the application for redress or complaint:
 - to an administrative or government body?
 - to a judge or a judicial body?
 - Are the activity reports of this independent body published or made public?
-