

THE ROLE OF OMBUDS AGENCIES
IN POLICE ACCOUNTABILITY IN THE COMMONWEALTH

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The word “Ombudsman” can be literally translated to “agent or representative of the people or group of people”¹. The Ombudsman, as a modern institution, was first established in Sweden’s 1809 Constitution, to act as Parliament’s supervisory body. Guyana was the first country in the developing world to adopt the concept of Ombudsman, in 1966. Of the fifty-three countries members of the Commonwealth, more than thirty have Ombuds agencies of some sort. Belize was the latest Commonwealth country to establish such an office. The establishment of an Ombuds office is one measure of a country’s seriousness about democratic values.

An Ombuds office, in its classical form, is defined as: *an office established by constitution or statute, headed by an independent high-level public official who receives complaints about injustice and maladministration from aggrieved persons against government agencies, officials or employees, or who acts on his or her own initiative.* Generally, the Ombudsman has power to investigate, criticize, recommend corrective action and generally publicize administrative actions but does not have power to invalidate actions or enforce the recommendations made. As an individual, the Ombuds person is someone of prestige and influence who operates with objectivity, competence, efficiency and fairness.

Most Ombuds Offices around the Commonwealth remain focused on traditional concerns such as maladministration and injustice against citizens. Increasingly, however, they are expanding their scope to deal with a broader range of issues, including human rights and corruption. This may lead to Ombuds agencies becoming more significant actors in oversight of police.

Namibia consummated a new type of “multi-purpose” Ombudsman that had slowly evolved in the Pacific, Africa (notably Uganda), southern Europe and Latin America. Arguably, wider than any previous Ombudsman legislation, the mandate of the Ombudsman office in Namibia includes maladministration, administrative injustice, corruption, the environment and human rights promotion and protection.

The mandate of the offices of the Ombudsman in the Caribbean region by law is mainly related to dealing with cases of maladministration. Occasionally though, offices of Ombudsman which were set up to deal specifically with cases of maladministration, end up extending the scope of their work to deal with cases of human rights abuses and cases of corruption.

In St. Lucia (where the Ombudsman is called Parliamentary Commissioner), powers are limited. If a complaint is made regarding a member of the Royal St. Lucia Police Force, the Parliamentary Commissioner must refer the matter to the Commissioner of Police for investigation and action. In Antigua and Barbuda, on the other hand, the functions of the Ombudsman are: *“to investigate any complaint relating to any decision or recommendation made or any act done or omitted by any officer of the Government or Statutory body in any case in which a member of the public claims to be aggrieved, or appears to the Ombudsman to have sustained injustice as a result of the exercise of the administrative function of that officer or body”*². This Ombudsman has wide powers to investigate, criticize, recommend and publicize administrative actions. The recommendations of the Ombudsman are made on the basis of illegality, breach of natural justice or due process of law, tardiness in reply or action and/or lack of information.

“Although a human rights mandate is not mentioned explicitly in many of the Ombudsman Acts in the Caribbean region, human rights issues are broadly dealt with by the Ombudsman from time to time resulting from complaints made, for example, by the public against the police and/or prison authorities”³.

Maladministration does not demand a wide interpretation to include human rights, its promotion and protection. Many cases of poor administration of public services and government functions do actually result in abuses of human rights and misuse of power. Discriminatory treatment on the basis of race and gender, for an example, interference into private affairs, improper police treatment, mistreatment of prisoners, are examples of public administration actions which may fall under the complaint jurisdiction of the Ombudsman and which involve the consideration whether the Government has violated international and domestic human rights obligations. Complaints that the police tortured individuals while treating them as suspects, other cases of police brutality, inhuman treatment in prison, are some of the human rights cases of complaints that the office of the Ombudsman in Antigua and Barbuda has dealt with⁴.

The Ombudsman in this sense, therefore, may be regarded as a particular type of human rights institutions, mainly in the small states and islands where it is necessary to consider the size of the country and financial constraints.

It should be pointed out that in Jamaica, the Public Defender (which is how the Ombudsman is called in this country) has additional responsibilities. Firstly the office is responsible for investigating any complaint from a member of the Public against the State. It also seeks redress for constitutional and administrative injustice and provides where necessary and possible, the attorney’s fees needed to pursue constitutional remedies in court⁵. A Commission of Parliament is responsible for appointing the Public Defender and his/her independence derives from the fact that the Public Defender is answerable to Parliament (to which the Public Defender annually submits reports) not to any Ministry of Government. Although the Government pays him he enjoys security of tenure. The Jamaican Constabulary Force was one of the authorities with the largest number of complaints against them⁶. The complaints relating to police had to do with dismissals, pensions and interdiction. It’s important to notice that apparently the Public Defender has tried to ask Parliament to debate its reports but he has not been successful.

Usually the Government only acts on some of the recommendations from the Public Defender. The tendency is that the Government will not respond immediately but only 2 or 3 years later. And then the recommendation is implemented without the Public Defender being credit for it. In fact, in 2000 through its report the Public Defender recommended that police officers should obtain regular refresher courses in firearm training, handling and use. This report was made in an effort to reduce the incident of death by shooting at the hand of the police. The Government initially ignored this recommendation but in 2003 the recommendation started to be implemented with the Government taking the credit for it.

In the Commonwealth Caribbean there are two approaches in the creation of the Ombudsman: one is the Constitution itself and another way is by statute (Ombudsman Act). In Guyana (Constitution Section 52.1), Trinidad and Tobago (Constitution Section 91.1), St. Lucia (Section 110.1) and Antigua and Barbuda (Section 66.1), the Ombudsman is a creature of the constitution. In Jamaica (The Ombudsman Act 1978, section 3.1), Barbados (section 2.1) and Belize (Section 3.1) the Ombudsman is a statutory creature.

It is important to observe that where the Ombudsman is created by the Constitution then to some extent he would be protected from any legislative erosion, but this is not so where the Ombudsman is created a statutory creature. The statute can be amended in the same manner as any other ordinary statute, which means instability.

In Grenada, a Public Sector Complaints Authority, the Ombudsman, has recently been set up as a formal mechanism to enable citizens to complain whenever subject to poor service from public sector institutions. The Ombudsman Office has jurisdiction over the Public Sector, in general, and over the activities of the Royal Grenada Police Force and Prisons Service⁷.

In Papua New Guinea (PNG) there is an Ombudsman Commission in place that includes both the office of the Ombudsman and an office implementing the Leadership Code, which is established by Section 26 of the Constitution. The Ombudsman Commission is prescribed by Sections 218-220 of the Constitution and also by the Organic Law on the Ombudsman Commission. These sections lay down:

- The Commission is independent, but funded by the national budget
- Its functions are to investigate conduct relating to administration, which may be “wrong” and enforce the leadership code (section 219)
- It is empowered to initiate investigations across a wide range of official bodies, and respond to complaints or referrals
- It can consider deficiencies in the law and question official decisions
- The Commission cannot inquire into “justifiability” of National Executive Council [Section 219(3)] or ministerial policy or court decisions [Section 219(5)]
- It can only publish and publicize its reports and recommendations⁸

As already mentioned, Section 26 of the Constitution of Papua New Guinea sets down the Leadership Code, directly applicable to key leadership positions such as the Commissioner of Police. In PNG, therefore, the Ombudsman enforces the Leadership Code as an accountability mechanism - offences of misconduct can be brought to the Public Prosecutor by the Ombudsman, and if the offence is not dealt with in a reasonable space of time, the “*Ombudsman Commission may prosecute in his stead*”.

It is important to mention that a specific Human Rights Unit has recently been set up to manage the increasing volume of specific human rights cases the Office has been receiving. – in the absence of a national human rights commission, or a properly functioning Internal Affairs department, it is inevitable that complaints against police will be directed here. The Ombudsman Commission of Papua New Guinea takes its job seriously and carries out its watchdog functions vigorously, particularly as it is the most significant accountability body in the country.

The Office of the Ombudsman in the Solomon Islands is established in Section 97 of the Constitution, and has been in existence since 1981. Like PNG, the Ombudsman is tasked with the investigation of maladministration on the part of the state and its organs – the office “*accepts, investigates and reports on complaints lodged with it, and is required to draw up an annual report and table it in parliament for legislative consideration*”.¹⁰ The office is endowed with fairly sweeping powers of investigation, including the power of summons accorded to a magistrate.

Transparency International points to two main obstacles for the Ombudsman in the Solomons – no powers to enforce decisions or recommendations, and the lack of autonomy due to the fact that the Ombudsman’s office, like the Leadership Code Commission, is administered by the Prime Minister’s Office.¹¹, leaving little room for operational autonomy. In fact, the Ombudsman closed the office for the bulk of 2003 after the Prime Minister ignored repeated appeals for separate office space. At that time, there was a massive backlog of cases dating from 1999. Similarly, the Office of the Ombudsman was lying vacant in Vanuatu for months at the end of 2004, as the President was lagging in deciding on a suitable candidate. Despite a strong legislative foundation, the executive often cripples these bodies.

In the case of the Ombudsman of the Solomon Islands, an estimated 60% of the 8062 cases handled by the Ombudsman’s office since establishment in 1981 have been brought by public servants as grievances of employment and workplace relations within the public service.¹² In practice, most complaints come from public service employees themselves. While this is a positive step to clean up the endemic corruption steeped in most Pacific governments, it may deflect the attention of the Ombudsmen from overseeing the police, which is increasingly being relegated to external donors rather than to national bodies.

The watchdog function of the Ombudsmen is hampered by a severe lack of resources, in terms of funding, staff, infrastructure and the required technical knowledge, particularly for the Ombudsman and Leadership Code Commission of the Solomon Islands and the Ombudsman Offices in Fiji and Samoa¹³ Lack of investigative skills, legal capacity, or essential personnel cannot cope with the actual caseload of most Ombudsmen.

Chapter 9 Part II (articles 61 to 65) of the Constitution of Vanuatu establishes the Office of the Ombudsman. Article 61(1) states, “*The Ombudsman shall be appointed, for 5 years, by the President of the Republic after consultation with the Prime Minister, the Speaker of Parliament, the leaders of the political parties represented in Parliament, the chairman of the National Council of Chiefs, the chairmen of the Local Government Councils, and the chairmen of the Public Service and Judicial Service Commissions*”. Anyone who holds any public office or exercises a position of responsibility within a political party is automatically disqualified for appointment as the Ombudsman. The Ombudsman has jurisdiction over all public servants, public authorities and ministerial departments, except for the President of the Republic, the Judicial Service Commission, the Supreme Court and other judicial bodies. The constitutional provisions allow for inquiries to be initiated on the discretion of the Ombudsman, upon receiving a complaint from a member of the public, or at the request of a minister, a Member of Parliament, of the National Council of Chiefs or of a Local Government Council. The Ombudsman has full authority to request any Minister, public servant, administrator, and authority concerned to provide any information or documents related to an inquiry. The inquiries of the Ombudsman are conducted in private, but the reports produced are public, unless the Ombudsman decides to keep a report (or parts of it) confidential on the grounds of public security or public interest. Importantly, Article 65 of the Constitution specifically asserts the operational autonomy of the Office of the Ombudsman, “*The Ombudsman shall not be subject to the direction or control of any other person or body in the exercise of his functions*”. The Ombudsman is required to report once annually to Parliament, and may make additional reports if considered necessary concerning the Office’s functions or action taken on his/her findings.

Vanuatu's Constitution lays down a code of conduct for all leaders of the country, including its police leadership¹⁴. In fact, many of the Ombudsman's public reports address the conduct of leaders and often refer to the Leadership Code in the Constitution. A Leadership Code Act came into force in August of 1998, which expands the breadth of the Leadership Code contained in the Constitution. The Act articulates the obligations of a leader, defines terms such as "interest", "conflict of interest", and "benefit", imposes duties of disclosure of personal interests and assets on leaders, and creates offences for breaches of the Leadership Code.

Despite what is prescribed in law, in practice the existing Offices of the Ombudsmen in Pacific countries consistently do their best to live up to their role as watchdog bodies and guardians of government accountability, even in the face of acute shortage of resources, funding, technical knowledge, and at times government obstruction.

It is important to remember that the Office of the Ombudsman is a fiercely individualistic post, and many times, the efficacy and activism of the position is largely representative of the type of personality who occupies it at the time. For instance, one Ombudsman in the Solomon Islands did not produce an annual report between 1991 and 1995, though the office did deal with complaints. Also, there is a discernible trend of Ombudsmen, particularly in Papua New Guinea, Vanuatu and Fiji, expanding their traditional roles of handling maladministration to take on anti-corruption and leadership functions more actively mainly with a view toward the public service generally.

The Ombudsman in Malta was established in 1995. The Ombudsman is an independent Officer of Parliament entrusted to conduct investigations on own initiative and on complaints lodged by citizens on any action taken by or on behalf of Government departments, Parastatal organizations, Statutory Bodies or Local Councils in exercise of their administrative powers, or failure to act accordingly. The Malta Police Force falls under the Ombudsman's jurisdiction. Upon concluding investigations and hearing the parties involved, the Ombudsman does not give any orders but makes recommendations. The Ombudsman has also been busy with complaints against police officers (the percentage of complaints received involving the police sector is 5%), although these have decreased in number since the establishment of the Police Board¹⁵:

The Ombudsman comments that the "*complaint handling system of the Police Force is not well publicized and not effectively managed.*"¹⁶ Furthermore, it is reported that the majority of complaints received regarding the police relate to the alleged failure to take effective action on reports by the public. In concluding his comments on the police, the Ombudsman in fact welcomes the introduction of the Police Board as an element strengthening a culture of accountability and responsibility of the Force.

In Cyprus, any complaint against members of the Police and the method of exercising their powers fall within the jurisdiction of the Ombudsman who examines all complaints and submits Recommendation Reports.

In Ghana, there is a Commission of Human Rights and Administration of Justice and it is the constitutional watchdog of the UN Declaration of Human Rights. However, this Commission also performs the role of the Ombudsman. Although they have all the powers of an Ombudsman their name does not portray the degree of trust that the civil society elsewhere has in their Ombudsman (Sierra Leone for example). Neither do they publish any reports of their work.

Botswana, Lesotho, Malawi, Mauritius and Mozambique all have an Office of the Ombudsman and South Africa, similarly, has a Public Protector. The Ombudsman/Public Protector is usually a public official of a high level; is impartial and independent of the government and is appointed by parliament.

The Ombudsman's duties are similar throughout the Commonwealth in that the Ombudsman/Public Protector can investigate complaints against government agencies and/or officials (including the police) as well as statutory corporations and/or officials and employees of such organisations and make recommendations and issue reports. Investigations, which may not be restricted or interfered with by any person, may include power abuses, human rights violations, corruption, maladministration and so forth. The Ombudsman in most Southern African countries has powers conferred upon him/her to perform these investigations.¹⁷ The Ombudsman, however, according to legal provisions, can only make recommendations, which are not legally binding to the bodies under investigation.¹⁸ Also there are certain areas which the Ombudsman cannot investigate such as in the case of Botswana whereby the Ombudsman cannot investigate "action taken with respect to orders or directions to the...Police Force or members thereof" and "action taken for the purpose of protecting the security of the state or investigating crime" and so forth.¹⁹ These provisions may therefore exclude certain situations of police abuse.

Zambia has a Commission for Investigators, headed by an Investigator-General, very similar to an Ombudsman except with reduced powers. When a Zambian commission recommended that the Commission for Investigations be transformed into an office of the Ombudsman the Zambian government rejected this recommendation and indicated its preference for the current situation. Consequently Zambia has an Investigator-General who is appointed to and is answerable to the President and it is therefore up to the President whether to implement recommendations, which is similar to the experiences of the Office of the Ombudsman in the countries mentioned.²⁰

Clearly, therefore, the primary obstacle to the effectiveness of the Ombudsman is that recommendations made regarding the violation of human rights may be ignored or, if taken seriously, not enforced by the organization which was investigated due to lack of interest or resource constraints respectively.²¹ The office of the Ombudsman may itself also be under-resourced and over-burdened. For instance in South Africa there are 25 investigators in the country who receive 4,000 complaints a year.²² The relevant authorities to which the recommendations are made are not legally bound to adhere to the recommendations.²³ Even though the office of the Ombudsman is mandated to investigate human rights violations, it may not be able to investigate or may not focus on *police* violations of human rights. For instance, South Africa's Public Protector usually deals with service delivery complaints about the police rather than incidences of abuse *per se*.²⁴ Botswana's Office of the Ombudsman cannot investigate complaints related to the security of the state and the investigation of crimes that "severely limits its ability to investigate complaints against the police."²⁵ Outright resistance to the Ombudsman may further hinder its effectiveness as an oversight tool. For instance, in Malawi the police have not co-operated with the Ombudsman in its investigations of police torture and brutality: The Ombudsman worked to ensure that the prosecution of offending police and compensation for victims took place and also ordered that police appear before public inquiries. The Inspector General of police however ordered that no police officer should appear before the Ombudsman after the Ombudsman had ordered the Inspector General to issue a circular to police requesting a stop to police brutality. The Minister of Home Affairs had to intervene to resolve the situation.²⁶

The Human Rights Act 1998 provides for adjudication by UK domestic courts and for the award of compensation in cases where public authorities have breached Convention rights. Complainants can take cases that the UK domestic courts cannot resolve to the European Court of Human Rights in Strasbourg. These arrangements provide a powerful legal framework making the police accountable for their actions. The Independent Police Complaints Commission, and in Northern Ireland the Police Ombudsman, take account of the Human Rights Act 1998, in investigating complaints about police misconduct. In Northern Ireland, the Police Ombudsman is responsible for investigating complaints, and has the power to initiate misconduct hearings.

Except for Maldives (from where no information is available) and Bangladesh²⁷, all the other Commonwealth countries in South Asia have an Ombudsman.

In Sri Lanka, the Ombudsman or the Office of the Parliamentary Commissioner for Administration²⁸ is envisaged as “an independent, informal and accessible authority” “established for the securing of redress to aggrieved persons in cases of misadministration, at a minimum cost²⁹”. The constitution³⁰ empowers the Ombudsman to investigate and report upon cases of infringement of fundamental rights and other injustices by public officers. The Ombudsman may report his/her finding to either the head of the institution or the concerned Minister or to the Public Service Commission. S/he may also require the head of the institution to notify, within a specified time, the steps s/he proposes to take to give effect to the recommendations. In case, inappropriate action is taken on the recommendations made by the Ombudsman, s/he is entitled to report this transgression either to the President or the Parliament.

In India, there is no Ombudsman at the Federal Level despite many attempts having been made through introduction of bills to create this agency under the name of Lok Pal. At the state level, the institution of Ombudsman as the Lokayuktas, were established in many states to look into accusations of corruption against people in high places. Interestingly, the Lokayuktas in most of the states in India have no jurisdiction over IPS³¹ (Indian Police Service) officers who form the fulcrum of the state administration and enjoy maximum discretionary powers. Even where they do have such powers, they can only make recommendations to the concerned government/department for taking action.

In Pakistan, the office of Wafaqi Mohtasib (Ombudsman) was established by the President Order I of 1983. This Order is now repealed by the ‘Establishment of the Office of Wafaqi Mohtasib (Ombudsman) (Amendment) Ordinance, 2002’. The main functions entrusted to Wafaqi Mohtasib are “to diagnose, investigate, redress and to rectify any injustice done to public through mal-administration of an agency of the Federal Government³².” So clearly the police, which is a provincial subject matter is not within his/her jurisdiction except for some Federal police agencies like the Federal Investigative Agency (FIA). Three provinces have also established offices of Ombudsman, which entertain complaints against the police and give recommendations to the government.

In Bangladesh, none of the governments have notified the Ombudsman Act 1980 till date and so there is no Ombudsman. Where they do exist, they are not regarded as effective accountability mechanisms and have failed to have any impact upon the functioning of the police. In Pakistan, the Federal Ombudsman has no jurisdiction over the provincial police. In the provinces, the

Ombudsmen are ineffective and even when they did decide on some cases concerning police excesses, many of their decisions were overruled by the Provincial Governor on appeal³³. In India, the Lokayukta, the state Ombudsman, usually has no jurisdiction over IPS³⁴ officers. Even where they have jurisdiction, their power is only recommendatory. In Sri Lanka, the Ombudsman has the jurisdiction over the police but his/her powers are limited. The Ombudsman has powers to investigate and make a report to the Head of the Department or the Minister in charge. S/he has no powers to enforce the recommendations, and in case no action is taken, the maximum that can be done is to report this transgression either to the President or the Parliament with appropriate recommendations for remedial actions. It is not regarded as a strong or effective accountability mechanism in the country.

ENDNOTES

¹ Ayeni, Dr. Victor O. *The Ombudsman Around The World: Essential Elements, Evolution and Contemporary Issues*. Article within the book “Strengthening Ombudsman and Human Rights Institutions in Commonwealth Small and Island States – The Caribbean Experience” – Commonwealth Secretariat in Collaboration with the International Ombudsman Institute

² See note 2 above

³ See note 6 above

⁴ See note 7 above

⁵ National Integrity Systems Transparency International Country Study Report Jamaica 2003 p. 35

⁶ National Integrity Systems Transparency International Country Study Report Jamaica 2003

⁷ Government Press Releases 2004 – “Grenada Cabinet approves establishment of Public Sector Complaints Authority

⁸ Transparency International, *National Integrity Systems 2003: Papua New Guinea*, pg. 27

⁹ Section 29(2), Constitution of Papua New Guinea

¹⁰ Transparency International, *National Integrity Systems: Solomon Islands*, 2004, pg. 30

¹¹ Transparency International, *National Integrity Systems: Solomon Islands*, 2004, pg. 24

¹² See note 40 above, pg. 24

¹³ Centre for Democratic Institutions and Tony Regan of the State, Society and Governance in Melanesia Project, *Evaluation of the Accountability and Corruption in Melanesia Workshop*, pg. 1

¹⁴ Part 10 of Vanuatu’s Constitution

¹⁵ All information obtained from the *Annual Report 2003*, Office of the Ombudsman, Malta.

¹⁶ *Ibid*, pgs. 60-61.

¹⁷ Office of the Ombudsman, Republic of Botswana: The Government of Botswana Web Site http://www.gov.bw/government/ministry_of_state_president.html#Ombudsman

Lesotho Government Website: Office of the Ombudsman

<http://www.lesotho.gov.ls/Ombudsman/gOmbudsman.htm>

Constitution of Mauritius, 1968.

Above, n.51, p.70.

Above, n.21, p.70.

¹⁸ Above, n.21, p.70.

¹⁹ Office of the Ombudsman, Republic of Botswana: The Government of Botswana Web Site http://www.gov.bw/government/ministry_of_state_president.html#Ombudsman

²⁰ Chanda, A.W. (2004b) Lecture Series: The 1996 Constitution Amendments, the Zambia Legal Information Institute: <http://www.zamlii.ac.zm/media/news/viewnews.cgi?category=2&id=1096459886>.

²¹ Above, n.11, p.6.

²² Above, n.51, p.71.

²³ *Ibid*. p.70.

²⁴ Above, n.2, p.134.

²⁵ Above, n.19.

²⁶ Above, n.20, pp.30-1.

²⁷ Notably, Article 77 of the Constitution of Bangladesh also provides that Parliament may by law establish the office of Ombudsman. The Constitution envisages the Ombudsman to exercise his/her powers to investigate any action

taken by a ministry, a public officer or a statutory authority and such other powers and functions as may be prescribed by Parliament. The Ombudsman shall prepare an annual report concerning the discharge of his functions and such report shall be laid before Parliament. In 1980, at the initiative taken by the then government, the Jatiya Sangshad (House of the Nation) passed the necessary Act providing for the establishment of the office of Ombudsman. But this law has never been notified and put into effect by any of the governments till today though more than 21 years have been passed since the passing of the Ombudsman Act 1980. The current government had promised to appoint an Ombudsman but according to the USSD 2003 “The Government took no action to appoint an Ombudsman as announced in early 2002.”

²⁸ The Office was created by The Parliamentary Commissioner for Administration Act, No. 17 of 1981 and subsequently amended in 1994 to expand the powers of the Ombudsman

²⁹ Fourth Periodic Report of Sri Lanka submitted to the Human Rights Committee under Article 40 of the ICCPR. See CCPR/C/LKA/2002/4 (18th September 2002) at page 36.

³⁰ Article 156 of the Constitution of Sri Lanka

³¹ These are police officers recruited by the Union Public Service Commission through a competitive examination placed at the top hierarchy in the police.

³² Report No. 15 of the Law and Justice Commission of Pakistan, (2-07-2001) <http://www.ljcp.gov.pk/reports/report15.htm> (accessed on 11-11-2004)

³³ Hussein, Zahid, Sadia Bokhari, Tannawwur Ali Hyder, Ahmad Mukarram, Salman Akram Raja, Mohammad Ali Saif (2004), *Evaluation report for annual performance review of Access to Justice Programme 2003*, submitted to the Pakistan Resident Mission, Asian Development Bank, Islamabad, May 2004 at pages 20 and 149.

³⁴ Indian Police Service comprises the higher officials in the police that are selected by a central examination and sent to different state police services.