

The role of the appeal procedure within the Ministry of the Interior in terms of fair trial rules

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ABSTRACT

In performing their work, police officers infringe on human rights and fundamental freedoms, so they must perform their work professionally and legally. If police officers violate the human rights and fundamental freedoms of an individual, the individual must complain about such an act. The complaint procedure is carried out on two levels. The first is the conciliation procedure, which takes place at the police station between the complainant and the offending police officer. In case of a serious violation of human rights, the complaint procedure takes place immediately at a session of the Appeals Chamber. The number of complaints about the work of police officers in Slovenia is small.

Keywords: police authorities, professionalism, human rights, access to justice, Slovenia

Vloga pritožbenega postopka v Ministrstvu za notranje zadeve z vidika pravil poštenega sojenja

POVZETEK

Policisti pri svojem delu posegajo v človekove pravice in temeljne svoboščine, zato morajo svoje delo opravljati strokovno in zakonito. Če policist posamezniku krši človekove pravice in temeljne svoboščine, se mora posameznik zoper takšno dejanje pritožiti. Pritožbeni postopek poteka na dveh ravneh. Prvi je spraven postopek, ki poteka na policijski postaji med pritožnikom in policistom kršiteljem. V primeru hujše kršitve človekovih pravic

se pritožbeni postopek izvede takoj na seji pritožbenega senata. Pritožb na delo policistov v Sloveniji je malo.

Ključne besede: policijski organi, strokovnost, človekove pravice, dostop do pravnega varstva, Slovenija

List of abbreviations and acronyms

ZDT-1: State Prosecution Service Act

ZNPPol: Police Tasks and Powers Act

ZODPol: Organisation and Work of the Police Act

1. Introduction

Security can be understood as a state in which the physical, spiritual and mental existence of the individual and society is guaranteed. Security threats are all those phenomena that reduce the existence and development of a given object (Prezelj, 2001, p. 131). There are various security organisations that prevent security threats. The police is such an example, protecting people's lives, personal safety and property (ZNPPol., 2013, Article 4). When police officers perform their duties, they must follow the general principles for the performance of police duties. In performing their work, police officers must respect and protect the right to life, human personality and dignity, as well as other human rights and fundamental freedoms (ZNPPol., 2013, Article 13). Police officers must be especially careful to treat everyone equally during procedures and to ensure that everyone's rights are equally protected (ZNPPol., 2013, Article 14). Police officers must be lawful in the performance of their duties and exercise their powers on the basis and to the extent provided by law (ZNPPol., 2013, Article 15).

That peace, justice and freedom are connected with human rights is also stated in the preamble of the Universal Declaration of Human Rights, where it is stated that the recognition of human rights, which are equal for all, is the foundation of freedom, justice and peace in the world. Human rights must be protected by the rule of law, so that there is no contempt and denial of rights, which leads to barbaric acts (Universal Declaration of Human Rights, 2018, p. 2).

The judicial system also fights for justice and the protection of rights in our society. The district court is a first-instance court that, based on Article 99 of the Courts Act, is competent to try criminal offences for which a fine or imprisonment of up to three years is prescribed, except for offences of defamation and besmirching honour committed through the media. The district court is also competent to decide on disputes due to disturbance of property, noise and real burdens, as well as disputes regarding rental and lease relationships. Circuit courts decide on situations where it is necessary to decide on allowing an infringement on human rights and fundamental freedoms. The next court is the High Court, which allows appeals against first-instance courts. The highest court is the Supreme Court, which decides on regular legal remedies against decisions of second-instance courts and on all other matters stipulated by Article 106 of the Courts Act (Judicial System, Slovenian Courts, e-source). The Constitutional Court deals with constitutional complaints due to violations of human rights and fundamental freedoms by individual acts (Jurisdictions, Constitutional Court of the Republic of Slovenia, e-source).

In 1998, Aleksander Matko filed a complaint against the Republic of Slovenia based on Article 25 of the Convention for the Protection of Human Rights and Fundamental Freedoms, because he claimed that the police had mistreated him and that the verification of his statements was not effective. He argued that the police had treated him inhumanly and humiliatingly during the proceedings, citing Article 3 of the European Convention for the Protection of Human Rights. He claimed that he had been illegally detained by the police, referring to Article 5 of the Convention, which states that everyone has the right to liberty and security and that no one may be unlawfully deprived of their liberty. Matko also claimed that the criminal proceedings had taken too long and were unfair, citing Article 6 of the Convention, which states that everyone has the right to a fair trial. The Appeals Chamber considered the complaint admissible and proceeded with the case (ECtHR *Matko vs the Republic of Slovenia*, 12/10/2006, p. 1). The European Court of Human Rights ruled that Article 3 of the Convention was violated because the state authorities had not conducted a thorough investigation into the complainant's statements and that the police had mistreated him (ECtHR *Matko vs the Republic of Slovenia*, 12/10/2006, p. 26).

The Court ruled that Articles 5 and 6 of the Convention had not been violated. The Republic of Slovenia had to pay the applicant EUR 10,000 for non-property damage and EUR 1,000 for costs and expenses and any payable taxes, within three months of the judgement becoming final (ECtHR *Matko vs the Republic of Slovenia*, 12/10/2006, p. 26).

If an individual believes that his/her human rights and freedoms have been violated during police procedures, he/she should be able to complain about such an action. In the complaint procedure, all the facts and circumstances of the event itself are clarified, and in the case of an established violation, the injured party is provided with fair compensation, and appropriate action is taken against the offending police officer.

1.1. Problem, subject and hypotheses

In police procedures, the human rights and fundamental freedoms of the individual are often violated, so police officers must respect rights, as this is the basis for their professional conduct.¹ In view of the above, it is important that an effective and professional supervisory and complaint system has been developed over the work of police officers, which will also be the subject of our research. However, problems arise when police officers violate an individual's human rights and freedoms in the police procedure, and that individual is not allowed to complain about such an act.

As part of the article itself, we tested the following hypotheses:

Hypothesis 1: "The complaint procedure regarding the work of police officers in Slovenia operates independently and impartially".

Hypothesis 2: "The number of cases of police misconduct is decreasing over the years".

Hypothesis 3: "In Slovenia, the number of complaints about the work of police officers is small".

1.2. Research purpose and objectives

The purpose of the article is to present in detail the complaints and monitoring system for police work. We also analysed reports

¹ We pay a lot of attention to protecting human rights in the police. (Police, 2009, e-source)

with statistics on complaints about the work of police officers and thus obtained a realistic picture of the subject matter in practice. Based on the analysis itself, we then verified the hypotheses, which is also the main objective of our research.

2. Research methods

In order to present the complaint and monitoring system for police work, we have reviewed and analysed the current legal sources that regulate the subject matter. We also used the method of review and analysis when studying reports, where we paid attention to the statistics of complaints about the work of police officers in Slovenia. Using the method of comparison, we then compared the findings with each other and combined them into a whole, and verified the hypotheses.

3. Complaint and monitoring system for police work

Anyone can initiate a complaint procedure about the work of a police officer. The Ministry of the Interior (hereinafter referred to as the Ministry) is responsible for monitoring and supervising the resolution of complaints. Complaints that are heard in the chambers are handled by civil servants within the Ministry, who are responsible for resolving complaints. Complaints are handled by the police in the conciliation procedure (ZNPPol, Article 137).

In the complaint, the individual exercises his/her right to disagree with an act or omission of an act of the police officer during the performance of police work, which may constitute a violation of human rights and fundamental freedoms. The aim of the complaint procedure is to establish all the circumstances, the implementation of the police procedure and the use of police powers (ZNPPol, Article 138). The Police Tasks And Powers Act states that the Ministry receives and handles complaints in the complaint procedure, appoints a reporter who determines the actual status of complaints, issues notices related to the complaint procedure, proposes measures to the director general of the police to eliminate irregularities, initiates disciplinary proceedings or other measures against a police officer, cooperates with the authorities

for the protection of human rights and fundamental freedoms, issues reports on complaint procedures and informs the public about established circumstances related to complaints (ZNPPol, Article 141 (1)).

It adds that the parties involved in the complaint procedure are the complainant and the police officer, the head of the police unit to which the police officer is assigned, the reporter, the minister's representative (hereinafter referred to as the minister), the Head of the Chamber, a representative of the public and any witnesses, experts or interpreters (ZNPPol, Article 142 (2)). The Act states that a complaint can be filed by an individual within 45 days from the day on which a police officer allegedly violated his/her human rights and fundamental freedoms through an act or omission in exercising police powers (ZNPPol, Article 146). It adds that the complaint can be heard in conciliation proceedings or before the Chamber (ZNPPol, Article 148 (1)). It notes that the Chamber is appointed by the Minister and consists of the Minister's representative as the Head of the Chamber and two representatives of the public as members of the Chamber. The Chamber assesses the merits of the complaint about the police officer and acts in the area of the police department where the incident is said to have taken place (ZNPPol, Article 151). When the Head of the Chamber receives from the reporter a report on the findings regarding the complaint, he/she orders a hearing in the Chamber and further conducts the session of the Chamber. The Head of the Chamber sends the complainant and the police officer a summons and a report on the findings of the complaint. At the end, the Chamber decides on the merits of the complaint by voting based on all the collected facts of the circumstances. The Head of the Chamber informs those present about the Chamber's decision, which is final (ZNPPol, Article 152). The conciliation procedure is concluded with a written reply to the complainant, in which the decision of the Chamber is explained. As a general rule, the proceedings before the Chamber must be concluded within 90 days of the receipt of the complaint case, unless this is not possible for understandable reasons (ZNPPol, Article 153).

Supervision of police work takes place within the police station. The police officer must record each use of police powers in writing within 24 hours of the police officer using the powers

(ZNPPol, Article 130). If the powers are a means of coercion, the police officer must report in writing in the form of an official note as soon as possible, but no later than by the end of working hours. If a firearm is used or physical or property damage has occurred due to the use of coercive means, the police officer must notify the head of the police unit immediately after use (ZNPPol, Article 131). The head of the police unit then assesses the legality and professionalism of the use of coercive means, unless a commission has been established for this purpose (ZNPPol, Article 132). In the event that a police officer fires a warning shot, uses an electric stun gun, or coercive means are used against five people and a light physical injury occurs, a three-member commission must be formed to verify the legality and professionalism and write a report on this. If a firearm is used, or severe bodily injury or particularly severe bodily injury occurs, the commission is appointed by the Director-General of Police (ZNPPol, Article 133). The commission is composed of an odd number of police officers not connected to the case (ZNPPol, Article 134).

The Organisation and Work of the Police Act states that the police is a body within the Ministry of the Interior (ZODPol, Article 2). The Ministry performs comprehensive, systematic and planned supervision over the implementation of police tasks and powers. In this manner, professionalism, legality and respect for human rights and fundamental freedoms are assessed. Supervision is carried out by direct inspection of documents at police units, by talking to police officers and by direct observation of the implementation of police duties in the field. Finally, a report is drawn up (ZODPol, Article 5). Supervision is ordered by the minister, who appoints the head of supervision and other officials (ZODPol, Article 6). Supervision of police work is the responsibility of officials employed in the internal organisational unit of the Ministry, who are responsible for direction and oversight (ZODPol, Article 7). During supervision, officials can request information from records kept and maintained by the police, request an inspection of records and documents obtained, prepared or issued by the police in accordance with their powers, invite police officers to an interview, enter all premises that the police use for their work, request data on technical means used by police officers, be present when police duties are being carried out

and request the provision of other data that is important for police supervision (ZODPol, Article 8). If during supervision it is established that police officers are violating human rights and freedoms, the head of supervision requests the head of the unit being supervised to immediately implement measures to remedy the unlawfulness. Other measures are determined in the supervision report (ZODPol, Article 10). There are several types of police work supervision, regular and extraordinary inspections (Guidance and Supervision of the Police Division, Ministry of the Interior, 2022, e-source). The department for complaints about the police handles complaints about the work of police officers independently, impartially and professionally, and also determines whether or not a police officer has violated human rights and fundamental freedoms in a specific police procedure (Complaints About the Police Division, Ministry of the Interior, 2021, e-source).

In the event that a police officer has committed a crime by abusing his/her powers, a special department within the State Prosecutor's Office, which is responsible for criminal offences committed by officials, will take over the case (ZDT-1, Article 199).

However, we must not forget the Ombudsman, which is an independent body and can act in case of any violation of human rights and fundamental freedoms by authorities. The findings are then recorded in reports (The Ombudsman in detail, Ombudsman, e-source).

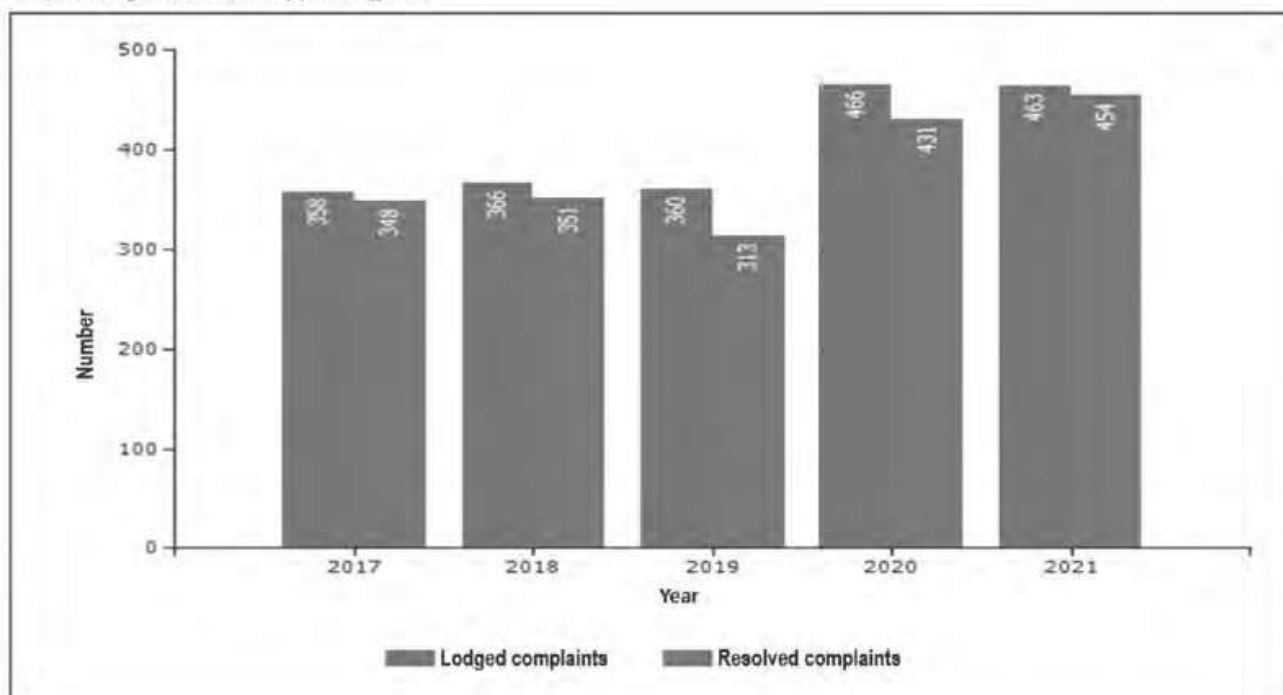
Human rights and fundamental freedoms must be respected and must not be violated, which is also explained in more detail in the European Convention on the Protection of Human Rights under Article 17 »Prohibition of abuse of rights«. (European Convention on the Protection of Human Rights, Article 17). As we already noted in our introduction, the Universal Declaration of Human Rights states that human rights are equal for all and that this represents the basis for world peace. The Constitution of the Republic of Slovenia also states that the state must protect human rights and fundamental freedoms on the territory of the Republic of Slovenia (Constitution of the Republic of Slovenia, Article 5). Human rights and fundamental freedoms must also be guaranteed and protected in police procedures and in the appeals procedures, both in the conciliation part as well as before the Senate. An analysis of annual reports regarding violations of human rights in police procedures is presented below.

4. Analysis of annual reports on violations of rights in police procedures

just like the Ministry and the police, the Ombudsman also publishes the number of complaint procedures against the work of police officers in annual reports. We will analyse the reports on police work for the period of the last five years, then we will analyse the reports of the Ombudsman.

Diagram 1: Complaints filed and resolved from 2017 to 2021

Complaints against the work of police officers



Source: Annual Report on Police Work in 2021, 2022, p. 173.

We analysed how many complaints about the work of police officers were filed and resolved from 2017 to 2021, as we do not yet have statistical data for 2022, because the year is not yet over. In 2017, 358 complaints were lodged about the work of police officers, of which 348 were resolved. In 2018, 366 complaints were lodged about the work of police officers, of which 351 were resolved. In 2019, 360 complaints were lodged about the work of police officers, of which 313 were resolved. In 2020, 466 complaints were lodged about the work of police officers, of which 431 were resolved. In 2021, statistics show that 463 complaints were lodged about the work of police officers, of which 454 were resolved (Annual report on police work in 2021, 2022, p. 173–

175). It can be observed that the number of lodged complaints and resolved complaints from 2017 to 2019 are fairly consistent. The number of lodged and resolved complaints increased in 2020 and 2021, when the numbers exceeded 400.

Figure 1: Resolved complaints according to the resolution method

Type of procedure	Numbers				
	2017	2018	2019	2020	2021
Conciliation procedure	112	131	106	139	140
-successfully concluded [150/5 ZNPPol]	70	85	69	83	76
-unsuccessfully concluded [148/3 ZNPPol]	42	46	37	56	64
-conduct of police officers according to regulations	97	112	83	102	108
-conduct of police officers inconsistent with regulations	13	11	12	14	13
Senates	72	73	56	59	65
-unsuccessfully concluded conciliation procedures [148/3 ZNPPol]	28	35	18	27	28
-direct hearing before the Senate [148/3 ZNPPol]	44	38	38	32	37
-substantiated complaints addressed before the Senate	17	10	7	10	13
Conclusion of the hearing	164	147	151	233	249
Total resolved complaints	348	351	313	431	454

Source: Annual Report on Police Work in 2021, 2022, p. 173.

In 2017, 112 complaints were considered in the conciliation procedure, of which 70 complaints were successfully resolved. A total of 72 complaints were examined at a Chamber's session. In 2018, 131 complaints were considered in the conciliation procedure, of which 85 complaints were successfully resolved. A total of 73 complaints were examined before the Chamber. In 2019, 106 complaints were lodged, of which 69 were successfully resolved; 56 complaints were examined before the Chamber. In 2020, 139 complaints were considered in the conciliation procedure, of which 83 complaints were successfully resolved; 59 complaints were examined at a Chamber's session. In 2021, 140 complaints were considered in the conciliation procedure, of which 76 were successfully resolved. A total of 65 complaints were examined at a Chamber's session. In 2017, there were 13 cases of police misconduct, 11 cases in 2018, 12 in 2019, 14 in 2020, and 13 cases in 2021 (Annual report on police work in 2021, 2022, p. 173–175). We can see that the number of cases of misconduct by police officers varied between 11 and 14 over the years, which means that the situation in this area has not significantly improved over the years.

Figure 2: Consequences of complaint procedures

Type of complaint	Number of complaints				
	2017	2018	2019	2020	2021
Recommendation to initiate a disciplinary procedure	1	1	0	0	0
Report submitted to the State Supreme Court [147/3 ZKP]	3	3	0	2	0
Warning and interview	29	16	17	20	15
Warning before regular termination of employment	0	1	0	0	0
Total	33	21	17	22	15

Source: *Annual Report on Police Work in 2021, 2022*, p. 175.

In 2017, 33 actions were taken as a result of complaint procedures, of which the most common action was a warning. In 2017, as an action, a report was sent three times to the Supreme State Prosecutor's Office and one proposal was made to initiate a disciplinary procedure. In 2018, 21 actions were taken as a result of complaint procedures, of which 16 were warnings, one was a proposal to initiate disciplinary proceedings and three were reports sent to the Supreme State Prosecutor's Office. In 2019, 17 actions were taken as a result of complaint procedures, which were all warnings. In 2020, 22 actions were taken due to complaint procedures, of which 20 were warnings and two were reports sent to the Supreme State Prosecutor's Office. In 2021, 15 warnings were issued due to complaint procedures (Annual report on police work in 2021, 2022, p. 173–175)

Figure 3: Number of complaints related to human rights

Basis	Number of complaints				
	2017	2018	2019	2020	2021
Children, minors and/or other persons from a vulnerable group were involved in the procedure	7	10	5	4	7
Complaint against the head of the police unit or its internal organisational units	2	3	2	1	2
Complaint lodged by a foreigner not residing in Slovenia	15	13	17	17	14
Complaint with other allegations of severe interference with human rights and fundamental freedoms	20	12	14	10	13
Total	44	38	38	32	36

Source: *Annual Report on Police Work in 2021, 2022*, p. 175.

Due to severe infringements of human rights and fundamental freedoms, 20 complaints were processed in 2017, 12 complaints

were processed for the same reason in 2018, 14 complaints in 2019 and 13 complaints in 2021 (Annual report on police work in 2021, 2022, p. 173–175)

In 2017, the Ombudsman dealt with 97 complaints, which mainly related to police procedures. (Annual Report of the Ombudsman of the Republic of Slovenia for 2017, 2018, page 235) In 2018, the Ombudsman dealt with 83 complaints, which mainly related to police procedures, which is less than in 2017 (Annual Report of the Ombudsman of the Republic of Slovenia for 2018, 2019, p. 339). In 2019, the Ombudsman dealt with 95 complaints related to police procedures, (Annual Report of the Ombudsman of the Republic of Slovenia for 2019, 2020, page 218) 71 complaints in 2020, (Annual Report of the Ombudsman of the Republic of Slovenia for 2020, 2021, page 357) and 51 complaints related to police procedures in 2021 (Annual Report of the Ombudsman of the Republic of Slovenia for 2021, 2022, page 302). On average, the number of complaints related to police procedures is declining. In 2019, the number of complaints increased slightly, but this number decreased again in the following two years, with the lowest number in 2021, namely 51.

The Complaints Division states in its report that, in practice, given the number of police procedures, few complaints are lodged, which shows that police officers are generally professional and within legal boundaries. In most cases of substantiated complaints, a warning interview was conducted with the officers involved (Resolving Complaints About the Police – Annual Report for 2021, 2022, p. 12–13).

5. Conclusion

In performing their work, police officers infringe on human rights and fundamental freedoms, so it is important that they perform their work professionally and legally. In the event that police officers violate the human rights and fundamental freedoms of an individual, it is important that the individual has the possibility to lodge a complaint about such an act. The complaint procedure is carried out on two levels. The first is the conciliation procedure, which takes place at the police station between the complainant and the offending police officer. In the violation of human rights, the complaint procedure takes

place immediately at a session of the Appeals Chamber, which is composed of a representative of the minister, as the Head of the Chamber, and of two members of the public. We established that the complaint procedure regarding the work of police officers in Slovenia operates independently and impartially. We may therefore confirm hypothesis 1 “The complaint procedure regarding the work of police officers in Slovenia operates independently and impartially”.

We also found out that the Ministry performs comprehensive, systematic and planned supervision over the implementation of police tasks and powers. In this manner, professionalism, legality and respect for human rights and fundamental freedoms are assessed.

In the analysis, we found that the number of lodged complaints and resolved complaints from 2017 to 2019 are fairly consistent. The number of lodged and resolved complaints increased from 2020 to 2021, when the number of complaints exceeded 400. The reason for such statistics can be attributed to the coronavirus, since in the last two years, in addition to the laws, special safety measures had to be taken into account to curb the spread of the new coronavirus. During this time, people were even more sensitive, which may have led to a higher number of complaints about police work in 2020–2021. We found that in 2017 there were 13 cases of police misconduct, 11 cases in 2018, 12 in 2019, 14 in 2020, and 13 cases in 2021. We also found that the number of cases of misconduct by police officers varied between 11 and 14 over the years, which means that the situation in this area has not significantly improved over the years. On the basis of the above, hypothesis 2: “The number of cases of police misconduct has been decreasing over the years” was rejected.

This could be changed by making police officers more aware of the practice where they acted inconsistently with the regulations and of the correct procedures to follow in the given cases. Such practice could also be transferred to the police academy.

In most cases, a warning interview was conducted with the police officers involved. Police officers carry out police procedures on a daily basis, all year round, so we can say that the number of complaints about police work is still low and that police officers

perform their work professionally and legally. Hypothesis 3 “In Slovenia, the number of complaints about the work of police officers is small” can be confirmed.

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