

Investigation name:	Operation Turton 4
IOPC reference:	2020/139742

>Summary of IOPC conclusions

A summary of our conclusions and our rationale is set out below.

PC Bonnie Murphy

Allegations of breached standards of professional behaviour (SoPBs)

Please refer to Paragraph 18 in our Investigation report for specific allegations against PC Bonnie Murphy.

We made a provisional determination of a case to answer for misconduct. Following consultation with the Metropolitan Police Service (MPS), we decided PC Murphy had a case to answer for gross misconduct

Summary of rationale

PC Murphy asked PC Lewis to send her the photo of Mr Brunt. PC Murphy had no legitimate policing purpose to request the photo, she did not save it onto a police database following receipt. PC Murphy explained her mother had a career in the MPS and suggested she may have been thinking it would be something she would share with her when discussing her policing activities.

Both PS Victoria Coughlan and PS Jim Bushell's accounts following their conversations with PC Murphy indicate she suggested she did not proactively request the image. The WhatsApp message content shows this is incorrect. After she provided an initial response to notice, PC Murphy was asked additional questions by the IOPC, who maintained she did not ask for the photograph, "I did not request the photo was sent to me. I can see now that it was wrong to have received it."

PC Murphy states she did not show or share the photo with anyone including her mother and deleted it from her phone within a matter of days. The IOPC did not obtain PC Murphy's mobile phone in the course of this investigation, as a result there is no independent evidence to suggest she is being untruthful in her statement.

PC Murphy acknowledges she did not challenge the behaviour of PC Lewis in relation to his possession of the image or him sharing it. When asked to elaborate as to why she

states, "I simply did not know what the implications of him having it were, or of him forwarding it to me."

PC Murphy received the photograph on 27 January 2020, she did not disclose the fact it existed nor that she was sent it to any supervisor/manager for approximately five months. PS Coughlan's statement dated 4 December 2020 details, "Whilst I cannot recall the exact conversation, PC Bonnie Murphy disclosed that when she was new to the team she had been sent a picture of a sudden death by PC Jamie Lewis to her mobile phone that she had not requested." On 6 July 2020, PS Bushell spoke to PC Murphy after which he completed an MM1. He recorded PC Murphy stated PC Lewis asked her if she wanted him to send her the image and she was non-committal. Whilst PC Murphy did approach a supervisor following the parade on 23 June 2020, she acknowledges she only did this once she was aware PC Lewis had been arrested and "I knew then that investigators would have access to his phone and this exchange would be on it. I just panicked."

PC Murphy attended Mr Brunt's home address and had witnessed first-hand the level of his decomposition, if she needed to discuss this with her mother (or anyone else) she should have been able to do so based on her own experience without the need to obtain any photographic evidence.

The sudden loss of a life will be a trying and difficult time for their loved ones, knowing an image has been taken and shared would likely compound that grief. Mr Brunt's family have made it clear this investigation has been a cause of great concern for them. The fact the photo was obtained by PC Murphy for non-policing purposes makes her request particularly unpleasant especially as she had attended the scene and therefore her subsequent interest (post shift) in obtaining such an image could be interpreted as nothing more than morbid fascination.

Whilst we acknowledge the fact PC Murphy was in the infancy of her police career at the time of her request (at the time the photo was requested PC Murphy was in the 11th month of her 12 month probation period), the counter argument to this is that at the time of the alleged breach she would have recently undertaken multiple training courses including those that specifically focus on the SoPB's. Therefore, it is arguable she ought to have known her request and obtaining of the photograph was not in line with the standards expected of her.

Concealing wrongdoing in question and/or attempting to blame others, PC Murphy indicates she did not knowingly make a false statement to her supervisors. Both state PC Murphy provided information to suggest she did not ask for the photo which the WhatsApp evidence shows is incorrect. Furthermore, in her statement dated 28 June 2021, she again maintains she did not request the photograph. This is at odds with her message to PC Lewis where she requests the photograph and includes the wording "Pretty please".

In terms of mitigating factors, PC Murphy has no previous complaints or disciplinary action recorded against her. PC Murphy states she is "...truly sorry" that she ever received this image and repeated she now has a much better understanding of what is appropriate in terms of the sort of material that "could properly be retained" by her on her mobile phone. She said, "I naturally would be devastated if knowledge of my possession of the image became known to those who were the family or friends of the deceased and in any way that would upset them or cause them to have less confidence in the police."

We accept there is no evidence to suggest PC Murphy shared the photo with anyone else (including her mother). PC Murphy attended Mr Brunt's address herself and did not take any photographs despite having the opportunity to do so. I also accept as a 'new' officer she would likely have felt uncomfortable challenging PC Lewis for having the image in the

first instance, although this in itself doesn't mitigate the requirement placed upon her to do so. PC Murphy has indicated she was not fully aware at the time that it was not appropriate to have this material on her personal phone and that she was influenced by the culture of the team. PC Murphy has shown remorse during our investigation and she did volunteer the information about the photo (albeit only when she knew it was likely to be discovered).

Therefore, there is, in our judgement, sufficient evidence from which a panel or presiding officer could conclude that PC Murphy has breached the SoPB's in relation to Integrity and Challenging and reporting improper conduct specifically relating to the request for the photo and in the accounts she provided to PS Coughlan and PS Bushell.

PC Murphy did not initiate the request for the exam papers but when asked if she wanted them she immediately responds with, "Well the exam is possibly Thursday so I'll take anything" *two emojis*. PC Murphy asserts she did not believe she was sent the actual test papers instead she thought they "were nothing more than revision aids based on previous exam papers, and example of the sort of thing that might crop up in the exam". Furthermore that it seemed "inconceivable" it was the actual paper and instead she utilised it as a revision aid. This is at odds with the message she sent PC Lewis in which she asked, "How will I know if they are the same questions?" *two emojis*.

The MPS have created a process to test their officers in relation to their driving capabilities and they have done this by designing a test covering three categories. If drivers do not complete the adequate revision/learning required and instead opt to cheat, this undermines the objective of the test and arguably their ability to drive to the desired standard.

If the documents were not providing an unfair advantage, why would PC Lewis request that it is not shared, and why would PC Murphy adhere to such a request. Based on the previous concerns around her integrity in relation to how she came to be in possession of the photograph of Mr Brunt, there could be an argument that PC Murphy shows a propensity to be untruthful when challenged on any potential wrongdoing.

If PC Murphy was unclear on the appropriateness of the documents provided to her she could have asked, instead she failed to raise concerns or seek advice from a colleague or senior officer. PC Murphy did not volunteer any information pertaining to the exam papers to a supervisor/manager until she was aware PC Lewis had been arrested and the exchange on his phone would be identified. PC Murphy acknowledges she cheated by using her phone to Google a question, whilst her exam was not invigilated, it is acceptable to expect that a serving police officer would still adhere to exam practices irrespective of physical supervision.

PC Murphy has shown remorse for her actions she states, "I am truly sorry that I resorted to looking up the meaning of the question on Google; I know I should not have done that." She states she was "simply panicking and desperate to pass the exam."

Considering recent road traffic incidents involving police vehicles and members of the public, it is reasonable to believe the public would perceive this behaviour negatively irrespective of the fact it was not known about at the time, and it would likely cause reputational harm to the MPS.

Therefore, there is, in our judgement, sufficient evidence from which a panel or presiding officer could conclude that PC Murphy has breached the aforementioned SoPB's.

The MPS were not in agreement with our provisional opinions that PC Bonnie Murphy breaches of SoPB amounted to misconduct. We carefully considered their views detailed in correspondence received on 1 November 2021. The MPS stated PC Murphy has been

dishonest about two matters and as a result, are of the view she has a case to answer for gross misconduct.

Having considered their stance and associated rationale, we noted PC Murphy has demonstrated a propensity to be dishonest, and as a result, agree her integrity and trustworthiness as an officer would be an ongoing area of concern for the MPS.

We agree a case to answer for gross misconduct would be more appropriate in this instance and therefore have determined that PC Bonnie Murphy has a case to answer for gross misconduct.

> PC Jamie Lewis

> Allegations

Please refer to Paragraph 19 in our Investigation report for specific allegations against PC Jamie Lewis.

We determined a case to answer for gross misconduct

> Summary of rationale

PC Lewis asked PC Q to take a photograph of Mr Brunt, "Take picture", the picture was then sent from PC Q to PC Lewis via WhatsApp a minute later. PC Q states the WhatsApp messages followed a verbal conversation between the pair relating to sending probationary officers to the scene. PC Lewis responded to the image stating, "Been there a while then *laughing emoji*" PC Lewis failed to provide a response to his notice of investigation so has not provided a rationale for his request.

On 27 January 2020, PC Lewis sent the photograph to PC Murphy, two days later he sent the photograph to a member of the public. PC Lewis failed to provide a response to his notice of investigation so has not given a rationale for disseminating the photograph to either party.

PC Lewis was aware PC Murphy stated she intended to show the photo to her mother and it is evident that he knew (or ought to have known) that was not appropriate as he immediately queries whether she works for the DPS. PC Lewis did not challenge or report PC Murphy following her statement that she intended to share the image. However, this is unsurprising as PC Lewis later shared the image with a member of the public, once he sent the image he had no control over where it may ultimately end up.

PC Lewis did not report to his supervisors/manager that he had the photograph or that he had shared it, this was only identified following his arrest.

PC Lewis failed to co-operate with the IOPC investigation into this matter, however when asked about the taking of such photographs in the Op Turton (1) criminal investigation he said he was not aware of any policies which prevented him from taking crime scene photographs on his personal phone.

PC Lewis joined the MPS in September 2019, having transferred from the BTP, on this basis he was not a typical probationer that was 'new' to the policing standards or the behaviours expected of him.

When PC Lewis' actions are taken in the context of Op Turton there appears to be a propensity of taking images of deceased persons and sharing these, as well as not challenging colleagues who take such images. If the wider public were made aware that pictures of deceased individuals were taken for non-policing purposes this would likely cause reputational damage to the MPS and may undermine confidence in the policing system.

PC Lewis responds to the image of Mr Brunt with a laughing emoji. If the use of this emoji was intentional (not selected in error) than it could be interpreted that PC Lewis found the image to be humorous which is of concern, considering it captured the sudden death of a man clutching his chest in a very decomposed state. It also brings into question the level of respect he extends to a deceased victim when he is in attendance at a scene. His alleged behaviour should also be considered in light of his involvement in Turton (1) where PC Lewis received a photo from a colleague, applied a Snapchat filter (he alleges this happened by accident) and then went on to share the amended image. PC Lewis has failed to show any remorse for his actions in relation to this investigation.

PC Lewis has no previous complaints or disciplinary action recorded against him prior to Operation Turton (1) and (4). PC Lewis's culpability must also be considered. PC Lewis' actions in Operation Turton (1) has led to significant media interest and reputational harm to the MPS. Therefore, there is, in our judgement, sufficient evidence from which a panel or presiding officer could conclude that PC Lewis has breached the aforementioned SoPB's.

Whilst it seems implausible that PC Lewis would self-report the alleged breach relating to the driving exam, this does not remove the requirement to do so, he received the images from PC S and followed her request to forward it to his colleagues without challenge. He also failed to self-report his or PC S's actions in relation to sharing restricted exam material. He then failed to report PC Murphy's conduct when she admitted to cheating in her exam. Several failures to challenge and/or report inappropriate behaviours could be indicative that PC Lewis fails to adhere to this standard in other policing matters/areas.

PC Lewis' messages show he believed the documents shared would be advantageous to the recipients, especially the document he sent to PC Murphy which contained his own answers to the exam questions. PC Lewis has failed to provide any rationale for his actions.

There is no evidence to suggest PC Lewis asked for the exam information prior to receiving it.

PC Lewis obtained the exam papers from a colleague and forwarded them to several colleagues without prompt, by sharing the papers he has attempted to give multiple officers an unfair advantage in their Basic Driving Exam and does not appear to be concerned about whether they are in fact competent basic drivers. He later asks PC Murphy if she cheated and when she responds she had, he fails to challenge or report this behaviour.

In relation to challenging improper conduct, PC Lewis had multiple opportunities to report this conduct, firstly when he received the documents and again when he shared them, the fact he shared his own driving exam document with his written responses exacerbates this concern. Therefore, there is sufficient evidence from which a panel or presiding officer could conclude that PC Lewis has breached all of the aforementioned SoPB's.

> PC Q¹

> Allegations

Please refer to Paragraph 21 in our Investigation report for specific allegations against PC Q.

We determined a case to answer for misconduct

> Summary of rationale

The evidence shows PC Q took the photograph on his personal phone (he does not have a work issued handset) and sent it to PC Lewis via WhatsApp whilst still at the scene. PC Q accepts he has access to a police issued tablet, which has camera capability but he was not sure he had it on his person and even if he did, he was not confident using it.

PC Q arrived at Mr Brunt's home address at 2.17pm, at 2.26pm PC Q reported, "Confirmed sudden death. The body is quite decomposed - I will call life extinct at 14:20." PC Q states the sudden death was "visually graphic" which, he found "quite challenging". PC Q sent the photo to PC Lewis at 2.31pm, he states this was to assess whether it was a scene the probationer officers could attend, he states, "For this reason alone, I saw it as an opportunity to afford some of my junior colleagues the chance to attend this property for their learning and development". He noted there was a limited period for them to attend as when the undertakers are called they are expected to attend within 45 minutes. At 4.36pm, it was reported the undertakers had arrived and taken Mr Brunt to East Ham.

PC Q sent the photograph to PC Lewis, but there is no evidence to suggest he sent it to anyone else which appears to support his claim it was taken for developmental reasons.

PC Q did not challenge PC Lewis when he used the laughing emoji, he states he believed it was in fact a crying face. He said, "I must stress that I only glimpsed at the WhatsApp message because I was busy, before I shortly after deleted it. If he has sent a laughing emoji, I personally find this appalling; that he found the death of a lonely man funny. It's

¹ PC Q has been assigned a pseudonym, as per IOPC Naming Policy, for facing misconduct only. This was later not proven by the Panel at the misconduct meeting.

disrespectful and completely against all I stand for and believe." PC Q did not respond to the message from PC Lewis.

PC Q took the image on his personal mobile phone despite having access to a work allocated tablet. We also do not accept PC Q's assertion that using the WhatsApp platform offered additional security as he had no control over where the image would ultimately end up as is evidenced by the fact it was later sent to a member of the public and an officer without his knowledge or approval.

The 'National Police Information Risk Management Team (NPIRMT): Use of WhatsApp and other Social Networking Applications Principles of use. Version 1.0 (May 2018)' states if police personnel are found to be using WhatsApp to receive or exchange police information, outside of approved, risk assessed official use this must be recorded as a security incident; any corrective measures may either be determined locally within the police force or may require escalation to Professional Standards.

It is for the panel to decide whether they accept PC Q's rationale for taking the photograph, his claim is supported by the fact multiple probationary officers attended Mr Brunt's address following his exchange with PC Lewis. PC Q has over 18 years of service and works in a team that has a large percentage of probationary officers. The intention to expose new officers to 'challenging' scenes that they will undoubtedly come across in their policing careers may be considered reasonable notwithstanding any concerns about the appropriateness of taking a photograph and using WhatsApp. In addition, some of the attending officers praised PC Q for the support he provided to them at the scene.

Based on the timeline detailed above PC Q had arrived and completed all relevant lines of enquiry to rule out a suspicious death within 14 minutes, in fact PC Q said he did not send the image straight away as he was busy at the scene but "after a short time" which indicates it could have even been less than 14 minutes. He noted there was a limited period for the probationary officers to attend due to time pressures caused by the undertakers attendance, however the undertakers arrived two hours after he had sent the picture to PC Lewis.

This timeline draws attention to whether it was credible for PC Q to believe at the time the photo was taken and sent that this scene was in fact a good training opportunity or whether these actions risked contamination of a scene. Given the time elapsed between arrival and sending the photo, a panel could find it unlikely PC Q and the other officer on the scene would have completed sufficient enquiries to be able to determine the death as non-suspicious.

PC Q is a tutor constable for student officers, responsible for signing their portfolios to enable them to begin independent patrol, he is also a mentor. PC Q states he believed he was filling a gap in training that had been removed once mortuary visits stopped, however PC Sheppard and PC Nicholson had both visited the mortuary, so it is arguable the attendance to Mr Brunt's address was not required. PC Q is not assigned as PC Murphy, PC Sheppard or PC Nicholson's mentor.

Mr Brunt's family may have concerns that the real intention when inviting multiple officers to attend the scene was morbid curiosity and may have concerns that the inappropriateness of this would be heightened if this occurred before police had completed enough basic enquiries to rule out this as a suspicious death.

Finally, under the standard 'Confidentiality' the Code of Ethics states officers must use social media responsibly and ensure they do not publish anything online that could reasonably be perceived to be offensive or that might run the risk of damaging public confidence in the police service. Therefore, there is sufficient evidence from which a panel or presiding officer could conclude that PC Q has breached the SoPB, Confidentiality.

Allegations related to the driving examination

> PC S²

> Allegations

Please refer to Paragraph 23 in our Investigation report for specific allegations against PC S.

We determined no case to answer, but advised reflective practice would be an appropriate outcome.

Summary of rationale

From the analysis of PC Lewis's phone, it was identified PC S sent exam paper material (with answers recorded) to PC Lewis on 6 February 2020. It has been confirmed the exam material PC S shared did contain the correct answers but the paper itself was not the Basic Driver exam, it was a Response course exam.

PC S has stated the material she sent to PC Lewis could have been easily obtained by any person. However, Inspector Devlin has confirmed this is not the case as considerable measures were put in place to ensure the exams were kept secure and the content was not leaked or shared with future candidates, which was the same for the Response exam as it was for the Basic and Advanced exams. The paper itself contains the handling instruction, "THIS DOCUMENT MUST BE SHREDDED AFTER USE".

PC S states she could not remember reading anything about the document being shredded, she said, "I would assume that that would denote that in some form it was confidential, but my understanding was that it was nothing more than an old paper that

² Pseudonyms have been assigned to all officers with no case to answer as per the IOPC Naming policy.

could be used as a revision guide. I never regarded it as being something which was assisting me to 'cheat' in the exam."

In her message to PC Lewis she asks him to, "Forward to the others x" he responds, "I love you *emoji*", she responds, "*Emoji* Might not be the same paper yet Good luck xx".

PC S states people use old exam papers as revision guides in all walks of life and she was unsure what unfair advantage arises unless "bizarrely, a paper which is read by someone and used as a revision guide, and they memorise all the answers, is then totally replicated as the paper which is presented to them and sat by them." PC S acknowledges if this were to occur it could be an unfair advantage but states she presumes "...that examiners would work to preclude that possibility". She concluded, "In my original statement I made it clear that I could see nothing wrong with sharing the test papers as a revision aid with colleagues who were to take the exam, or having them shared with me; that remains my position and indeed my understanding of the reality of the situation here."

PC S's account is that she offered to send the papers to PC Lewis, the evidence does not suggest that PC Lewis asked for these papers. The scenario does not fit the usual circumstances where a failure to challenge improper behaviour arises, i.e. where the officer is aware a colleague is acting, or intends to act, in a way that breaches the standards of professional behaviour. Here, PC S has embarked herself on a course of conduct and therefore we do not consider that the failure to challenge standard would be engaged under these circumstances.

PC S shared documents which contained very specific handling instructions that were evidently put in place to prevent wider dissemination, however, PC S states she did not see the handling instruction and there is no evidence to confirm she did. We cannot say with certainty she saw and chose to disregard the directions, nevertheless the handling conditions were breached.

PC S appears to accept that the test shared may have been the same paper her colleagues would sit and therefore recognises an unfair advantage may arise, her response to this is the management of any potential breach would be controlled by the examination team who would take measures to "preclude that possibility".

This rationale is of slight concern. PC S appears to indicate that any ownership of such breaches should be managed/mitigated by the learning and development teams, whilst not recognising that all officers (including her) share the responsibility to maintain the high standards required of them by their employer. Furthermore, as a serving police officer with approximately eight years of service at the time of the alleged breach she should be heightened to observing and adhering to handling restrictions.

Overall, whilst her actions were unwise there is insufficient evidence from which a panel or presiding officer could conclude that PC S has breached the aforementioned SoPB's. We were of the view that PC S would benefit from reflecting on her part in the form of a process of reflective practice.

> PCR

> Allegations

Please refer to Paragraph 25 in our Investigation report for specific allegations against PC R.

We determined no case to answer

> Summary of rationale

At 1.22pm on 6 February 2020, PC Lewis sent the images he received from PC S regarding the driving exam to the WhatsApp group. PC Lewis, PC R and PC T completed and passed the Basic Driving exam on 6 February, all three officers sat Paper 1.1. PC R achieved a score of 26 out of a possible 35.

PC R recalls receiving the exam paper material from PC Lewis via WhatsApp, he said, "I opened them up to see what they was but didn't fully go through them." He stated from what he could remember he was not aware PC Lewis was going to send this material and believed the papers were "copies of an old driving exam." He further states he did not believe they were copies of the exam he was due to sit as "there are multiple different varieties of the driving exam, all with different questions, it would of [sic] been impossible to believe that this was the exact exam I would sit."

PC R was asked if he noted on paper 1.10 it stated 'THIS DOCUMENT MUST BE SHREDDED AFTER USE' he said he "didn't read it well enough to note the shredded notice."

There is no evidence to suggest PC R asked for the examination papers prior to receiving the message from PC Lewis. It is apparent the exam papers were shared shortly before the examination took place, as a result we believe PC R had limited time to look through the material and doubt he could have received any real benefit due to the limited time he had to review the material. Whilst he passed his examination, the result (26 out of a possible 35) does not necessarily support that he cheated.

There is no evidence to show PC R saw the handling instructions and chose to disregard it, as a result we accept he believed they were old exam papers, with that in mind it seems appropriate that he did not feel there was a requirement to self-report or report PC Lewis (or other colleagues in the group chat) for the sharing of the documents.

Therefore, there is insufficient evidence from which a panel or presiding officer could conclude that PC R has breached the aforementioned SoPB's.

> Allegations

> PCT

> Allegations

Please refer to Paragraph 26 in our Investigation report for specific allegations against PC T.

We determined no case to answer

> Summary of rationale

At 1.22pm on 6 February 2020, PC Lewis sent the images he received from PC S regarding the driving exam to the WhatsApp group. PC Lewis, PC R and PC T completed and passed the Basic Driving exam on 6 February, all three officers sat Paper 1.1. PC T score has not been confirmed.

PC T said he vaguely recalled receiving images but he did not review them so he did not know what they were. He said, "The option 'save to camera roll' has always been turned off on my WhatsApp so they did not auto save on my phone." He said he did not review the images prior to or after taking the exam. He said he was not aware PC Lewis was going to send him the images and did not believe they were copies of the exam he was due to sit. PC T said he did not recall reading the instruction "THIS DOCUMENT MUST BE SHREDDED AFTER USE" as he did not review the images.

PC T states, "I had no concerns at the time of receiving this material as I did not know its true nature, having not reviewed any of the images and being aware of what they truly were. Having been appraised of their content since the initial receipt by means of this investigation, I do not condone the possession of such materials and if I was aware of the content, I would have challenged its distribution and notified a supervisor." He further states, "Having been made aware of their unauthorised possession and distribution during this investigation, I do consider that PC Lewis has acted inappropriately."

There is no evidence to suggest PC T asked for the examination papers prior to receiving the message from PC Lewis. It is apparent the exam papers were shared shortly before the examination took place, as a result we accept PC T may have had limited opportunity to review the material.

There is no evidence to support that PC T saw the handling instructions and chose to disregard it, as a result we accept he believed they were old exam papers, with that in mind it seems appropriate that he did not feel there was a requirement to self-report or

report PC Lewis (or other colleagues in the group chat) for the sharing of the documents. PC T has expressly stated had he known about the content (and its restrictions) he would have reported it accordingly, we have no evidence to suggest he is being untrue in this claim.

Therefore, there is insufficient evidence from which a panel or presiding officer could conclude that PC T has breached the aforementioned SoPB's.

> Misconduct proceedings

On the 16 August 2022, the Metropolitan Police Service held a misconduct meeting for PC Q. Misconduct was not proven and therefore no sanctions were applicable for the officer. They were ordered to take the reflective practice review process to learn and reflect on their actions.

Between 25 January – 27 January 2023, the Metropolitan Police Service held a misconduct hearing for PC Bonnie Murphy and PC Jamie Lewis.

The disciplinary panel, led by an independent legally qualified chair, ruled they were both in breach of the police professional standards of behaviour relating to honesty and integrity.

PC Murphy was dismissed without notice and placed on the College of Policing barred list.

PC Jamie Lewis, who was previously sacked and jailed for sharing photos of murder victims Nicole Smallman and Bibaa Henry, would have been dismissed if he was still a serving officer.

Organisational Learning

We carefully considered whether there were any learning opportunities arising from the investigation. We make learning recommendations to improve policing and public confidence in the police complaints system and prevent a recurrence of similar incidents.

In this case, the investigation has not identified any learning.