



CORRUPTION VULNERABILITY ASSESSMENT

The Corruption Vulnerability Assessment (CVA) is the second stage of the Integrity Development Review. Geared towards examining the high-risk functions, programs, or activities of the agency, the CVA takes a closer look into these perceived vulnerable areas to consider how and where the probability of corruption could occur. In the process, it would also gauge the adequacy of existing controls and whether said controls are operating, as they should. After the assessment, suggestions or measures to strengthen controls and address residual risks would be generated.

In the Philippine National Police, the three CVA areas identified are: (1) Human Resource Management focusing on Recruitment/Selection, Promotion, and Lateral Entry; (2) Whistleblowing and Internal Reporting looking into the Grievance Machinery, Summary Dismissal, and Pre-charge Investigation and Summary Hearing; and (3) Interface with External Environment particularly on Issuance of Motor Vehicle Clearance, Processing of New License on Explosives, License to Operate Security Agency, and Permit to Carry Firearms Outside of Residence.

Selection of CVA Areas

The three CVA areas were selected based on the results of the Integrity Development Assessment (IDA) and the Survey conducted. For one, HR Recruitment and Promotion were both cited as vulnerable areas in the IDA and the survey. As for Whistleblowing, this is not institutionalized yet in the PNP; hence it garnered a zero rating in the IDA. With regard to Interface with External Environment, according to the focus group discussion, the PNP is being corrupted from without not from within. Although this has rated very well in the IDA (a rating of 3) this is considered a vulnerable area by the IDR Team because police work need continuous community assistance and this area generates substantial revenues for the PNP.

CVA Sites and Schedule

The CVA in the Philippine National Police was conducted in three sites: National Headquarters, Camp Crame on June 26 – 30, 2006, Police Regional Offices VII (Camp Sergio Osmeña and XI (Camp Catitipan) on July 3-7, 2006 simultaneously. A Police Provincial Office and a Municipal Police Station were likewise visited in both regions.

CVA Sites	Dates Conducted
<u>PNP National Headquarters, Camp Crame, Quezon City</u>	<u>June 26-30, 2006</u>
<u>Police Region VII Office, Camp Sergio Osmeña, Cebu City</u>	<u>July 3-7, 2006</u>
<u>Police Region XI Office, Camp Catitipan, Davao City</u>	<u>July 3-7, 2006</u>

The approaches used in the conduct of the CVA were interviews with key informants and clients, document review, process observation, ocular inspection, photo-documentation, and walkthrough.



CVA Area 1: HUMAN RESOURCE MANAGEMENT

One of the CVA areas is Human Resource Management, with focus on Recruitment, Selection & Appointment, Promotion and Lateral Entry. At the National Headquarters, the offices looked into were: the Directorate for Personnel and Records Management (DPRM), Recruitment Section of the Recruitment and Selection Division (RSD), Headquarters Support Service (HSS), Special Action Force (SAF) in Taguig, and Makati Police Station. In Police Regional Offices VII and XI the sites visited were: Regional HR office, Provincial Office, a Municipal Police Station (Naga for Region VII and Tagum for Region XI).

A main function of the RSD is to advise/assist the TDPRM on matters pertaining to recruitment, promotion and placement of personnel and implements plans and policies relative to said matters. It manages the procurement/appointment of personnel and supervises attestation of all appointments of Police Commissioned Officers (PCO's), Non-Commissioned Officers (PNCO's), and Non-Uniformed Personnel (NUP). It sees to the placement and related activities of PNP personnel in the different units, studies the employment of human resources according to their qualifications to specific duties and assignment and compiles all personnel evaluation records.

Recruitment

The PNP Recruitment, Selection and Appointment system is guided by NAPOLCOM memorandum circulars, directives and issuances. The NAPOLCOM is mandated by law to exercise administrative control and operational supervision over the PNP. The following memoranda provide the guidance and procedures for PNP Recruitment:

- a. NAPOLCOM MEMORANDUM CIRCULAR NO. 2005-002 AMENDING MEMORANDUM CIRCULAR NO. 2003-009 ENTITLED “FURTHER AMENDING THE NAPOLCOM MEMORANDUM CIRCULAR NO. 92-015 PRESCRIBING A STANDARD PROCEDURE FOR THE RECRUITMENT, SELECTION AND APPOINTMENT OF PNP UNIFORMED PERSONNEL DATED NOVEMBER 26, 1992 AND OTHER RELATED ISSUANCES”.
- b. NAPOLCOM MEMORANDUM CIRCULAR NO. 2005-006- “RATIONALIZATION OF THE QUALIFICATION STANDARDS FOR THE INITIAL APPOINTMENT IN THE PNP UNIFORMED PERSONNEL”
- c. MEMORANDUM CIRCULAR NO. 2005-007 – “PRESCRIBING THE STANDARD PROCEDURES FOR THE RECRUITMENT, SELECTION AND APPOINTMENT OF PNP UNIFORMED PERSONNEL FOR POLICE REGIONAL AND PROVINCIAL MOBILE GROUPS (N=1,900), SPECIAL ACTION FORCE (N=400) AND HEADQUARTERS SUPPORT SERVICE (N=200) FOR CY 2005”.



Pre-Recruitment

Prior to the conduct of recruitment, the PNP DPRM prepares an Annual Recruitment Plan (ARP) indicating the allocation of quota including qualifications and submits this to CPNP for approval. Upon his approval, the CPNP in turn submits the same to NAPOLCOM for approval. The PNP quota allocation for recruitment in the National, Regional, City and Municipality is based on the annual recruitment program as approved by the NAPOLCOM.

The qualification standard set by NAPOLCOM for an applicant to become a Police Officer is based on the principle of merit and fitness with no discrimination on account of gender, religion, ethnic origin or political affiliation.

The recruitment quota for City and Municipality is based on the following factors: 1) Police to population ratio; 2) Peace and Order condition in the respective locality; 3) Actual demands for police service; and 4) Class of City or Municipality. On the other hand, the quota given to any of the National Support Service is based on the actual demands of the functional area covered.

After the NAPOLCOM returns the approved quota to CPNP the DPRM will disseminate copies of the approved quota allocations to all Directors of National Support Units and Police Regional Offices who in turn disseminate the information in writing to Director of Provincial Police Offices and City Chiefs of Police. The recruitment in the PNP is being monitored by the DPRM with corresponding time frame given to all units/offices for them to comply with.

The recruitment of Police Officer I in Police Regional Offices is the function of the Chief, Regional Personnel and Human Resource Management Division under the leadership of the Police Regional Director.

Upon the directive of the Police Regional Director through the Regional Personnel and Human Resource Management Division a Screening Committee is activated or organized for the purpose of recruitment in all levels. The Committee is responsible for evaluating the applicant's qualifications and choosing the most qualified applicants to be recruited in their respective areas.

At the municipal/city level, the mayors are not only responsible for organizing the ad hoc screening committee but also for the tri-media campaign to attract the most qualified applicants.

Findings and Comments:

The recruitment in the National Support Units (NSUs) in the PNP is handled by the Headquarters Support Service (HSS) located in the NHQ-PNP in Camp Crame, Quezon City. The HSS eventually deploys the successful recruits to other Administrative Support Units after their completion of the required Public Safety Basic Recruit Course (PSBRC) and twelve (12) months Field Training Program. All new recruits undergo the same training programs irrespective of where they were recruited (whether recruited from the Regional Offices, Special Action Force, or from the National Headquarters).

In the Special Action Force (SAF), an elite, highly - trained and specialized police unit, recruitment process is more stringent. Applicants are made to sign an oath of undertaking that they will serve in



the SAF for five (5) consecutive years if ever they will be appointed, and execute an affidavit that they agree to be dismissed, be charged of criminal and administrative offense in a court of law for any false information given. (At HSS, an applicant is asked to execute an Affidavit of Professional Commitment and Undertaking, which is similar in form to that of SAF.)

Information gathered from the Office of the Chief for Personnel and Human Resource and Doctrine and Development (PHRDD) in NHQ and Police Regional Offices disclosed that during the course of their recruitment process there were external interventions such as; "Reseta" – a letter from a politician or from higher authority to ensure the appointment of a recommended applicant into the police service. These requests are received and responded to by all the recruitment offices visited. Samples of communication were shown to the team as well as their responses. Those in charge of recruitment are used to these and although viewed as an inconvenience, they nevertheless attend to these without compromising the recruitment standards.

The role of the politicians (mayors/governors) in recruitment and selection is an accepted fact. Those interviewed said this political intervention is provided for by law (RA 8551) and they must follow the law. Similarly, the NAPOLCOM's role is clearly spelled out from the start of the recruitment process. The presence of the NAPOLCOM Representative in the recruitment process should serve as a deterrent to deviations from the rules and procedures set forth by the NAPOLCOM.

In the pre-recruitment stage, the activities perceived to be vulnerable are the activation of the different screening committees and the information dissemination that is being done by the mayors. The risk factors could be in the form of bias/favoritism, political patronage, and abuse of discretion.

Although there are present safeguards such as the adherence to Memo Circular No. 2005-002, qualification standards (QS), publication of the recruitment, there has been responses in the survey that "bata-bata system or palakasan" exist.

Recommendations:

It is therefore recommended that transparency be observed in all stages of the recruitment process. Likewise, the widest possible information dissemination of the recruitment of Police Officers be conducted by PNP to attract as many applicants as possible, so that even those not liked by the mayors but are qualified could submit their application papers to the PNP recruitment office.

Selection

At this stage of the recruitment process, the created Adhoc Body at the municipal level is tasked to select the most qualified applicants. The list of applicants is published and the public is encouraged to give feedback on the worthiness of said applicants. Application folders received are consolidated and submitted to the Adhoc Body for initial screening and preliminary interview. This is done within fifteen working days. After which, the Adhoc Body endorses ranked recommendees to the Regional Directors copy furnished the Provincial Directors.

The final evaluation of the applicants is done by the Regional Screening Board. The following examination/tests are conducted:



- Paper/pencil examination (not given during the recent recruitment because applicants are college graduates or passed NAPOLCOM examination),
- Physical Agility Test (PAT) to assess the physical fitness of the applicants
- Neuro-Psychiatric Exam (5 days) to determine the psychological soundness of the applicants; is given to those applicants who passed the PAT
- Complete Physical, Medical and Dental Exam (5 days) to determine physical and mental fitness of applicants; is given to those applicants who passed the Nero-Psychiatric exam
- Drug test (may be administered any time)
- A Character & Back-ground Investigation (3 days) to check character and reputation of applicants; undertaken by DIDM
- A Final Interview to determine the aptitude, appearance, and conversational ability of the applicants

The Screening Board submits the list of Candidates for PO I to PNP Regional Director who in turn endorses this to NAPOLCOM for review and certification. Afterwards NAPOLCOM returns the List of Proposed Appointees to the PNP Regional Director (3 days).

The HSS and SAF follow the same procedures in selecting the most qualified applicants.

Findings and Comments:

The selection process is followed by the Screening Committee/Recruitment Offices visited as prescribed in the Memo Circular 2005-002. The officers interviewed were vigilant and alert about possible deviations from standard procedures. They claimed that a NAPOLCOM representative is always present during the entire process.

Recently, the HR office of Police Region VII has conducted an entrapment operation because of a blind item in a local newspaper, which said that a POI position is for sale.

The activities under the selection process of police applicants that may be considered vulnerable to corruption are: the creation of the Adhoc Body which could be politicized because of its make up, the initial screening and preliminary interview which may be at risk of favoritism or political intervention or abuse of discretion, and the final interview, which may be subjected to the same risks mentioned above. Political interference or pressure from high-ranking officials is a hardship mentioned by all sites. The qualification standards are present but the implementation may yet be looked into for standardization purposes since this could become vulnerable to corruption.

The present safeguard for this process is strict adherence to Memo Circular 2005-002 particularly on screening of applicants and the timelines prescribed. Another safeguard is the presence of the NAPOLCOM representative from the start of recruitment to selection. However, given the risk



factors such as political intervention, abuse of discretion, and favoritism additional measures may yet be instituted to ensure that the most qualified applicants are selected.

Recommendations:

Given the identified risk factors and the existing controls, the IDR Team recommends the following:

- Transparency in every step of the process.
- Ranking system be made according to eligibilities, board rating, physical agility test result, and neuro-psychiatric examination.
- Clear parameters set for the conduct of the Final Interview.
- Documentation of the Final Interview.
- Publication of test results after every test to include deviations from PSB decisions.

Appointment

The Regional HR prepares the appointment papers of successful applicants certified by the NAPOLCOM Regional Director. Then the PNP Regional Director approves, signs, and submits these appointment papers to the Regional CSC for attestation (30 days). Afterwards the PNP Regional Director approves the individual appointments. Then the Regional Director informs the mayor, NAPOLCOM RD, Provincial Director, Chief of Police, and RPSC regarding the appointments within 5 days.

Findings and Comments:

There are no risk factors identified under this process primarily because of the involvement of the NAPOLCOM and the Civil Service Commission. An interview with a NAPOLCOM Officer in Region VII revealed that when checking the final appointment papers of the successful applicants at one time, they were able to find and correct some irregularities (e.g., below height requirement, did not pass PAT, etc.).

Promotion

Promotion is processed at the National Headquarters. It follows the following phases:

Phase 1: General Preparation (30 Days)

The process starts with DPRM's publication of the Promotion Program, the Seniority Lineal List (SLL), and the activation of the Promotion Board. After the said publication, the PRO/NSU conduct general canvassing of promotable personnel in their respective Offices/Units while the Promotion Board determines Zone Consideration based on guidelines provided under Memo Circular No 2005-012.



Phase 2: Submission, Evaluation Screening Of Documents (20 Days)

This phase is characterized by submission of required documents, which are submitted in 3 folders to the Secretariat for table evaluation and records checking. A set of guidelines is observed by the Promotion Board during the table evaluation. Those who qualify after this evaluation are made to submit two additional folders containing the required documents and a set of documents to support the attestation of the applicant's appointment by the CSC in case he/she is promoted by the CSC and another set of documents to be submitted to the Records Management Division of DPRM. All the documents to be submitted should be authenticated by issuing authority or agency.

Phase 3: Board Interview (27 Days)

All applicants who passed the table interview will qualify for the Board interview. This interview is set and conducted by the Promotion Board. In this phase, the applicants are required to provide each member of the Board a completely filled up Police Personal File for reference purposes for the interview. The Board members use a worksheet during the conduct of the interview. It is a general rule that if an applicant failed to appear during the scheduled interview, he/she would be disqualified.

Phase 4: Final Board Deliberation (14 Days)

The Secretariat prepares the final promotion worksheet indicating applicants who passed the promotion process ranked from highest to lowest. The Board convenes and deliberates en-banc on the best-qualified applicants to be recommended to the Appointing Authority. Afterwards, the Secretariat prepares the Board Resolution for signature of all the members. Then the qualified applicants' appointment papers (CSC, KSS, Form 33) are prepared for the signature of the Board Chairperson.

Phase 5: Preparation of Appointments (14 Days)

The NHQ Board Resolution is submitted accompanied by the Appointment Papers (CSC, KSS, Form 33) to DPRM, which in turn shall prepare a position paper on the matter for approval of the CPNP. Similarly, PRO & NSU level Promotion Board Resolution shall be submitted accompanied by the appointment papers (CSC, KSS, Form 33) to their respective PRO/NSU Personnel and Human Resource Management Chief, who shall in turn prepare position paper on the matter for approval of the PRO/NSU Director.

Phase 6: Civil Service Attestation Issuance of Special Order & Oath-Taking (14 Days)

After the signature of the Appointing Authority, the appointment papers (CSC KSS Form 33) of promotees shall be submitted to the CSC for attestation. After attestation by the CSC, the appointments of the promotees shall be announced through the issuance of PNP Special Orders. An oath taking ceremony shall subsequently follow to solemnize the appointment of the promotees.



Findings and Comments:

Republic Act No 8551 guides the Philippine National Police promotion system. Promotion is covered under Section 31 Rationalized Promotion System, Section 32 Promotion by Virtue of Position, and Section 33 Promotions (a) and (b), which amended Section 38 of RA 6975. Another guide is the LOI 67/05 (CY 2005 Regular Promotion Program (2nd Phase) issued on Oct. 21, 2005.

Based on the provisions of the law, promotion for Police Commissioned Officer and Police Non-Commissioned Officer may be achieved in three (3) different modes as follows:

- Rationalized Promotion System. The NAPOLCOM established system of promotion based on merits and the availability of vacant positions in the PNP Staffing Pattern. The system should be gender fair and ensure that women members of the PNP enjoy equal opportunity for promotion as that of men.
- Promotion by Virtue of Position. Any PNP personnel designated to any key position whose rank is lower than that which is required for such position, shall after six months of occupying the same, be entitled to a rank adjustment corresponding to the position; Provided that the personnel shall not be reassigned to a position calling for a higher rank until after two years from the date of such rank adjustment; Provided further, That any personnel designated to the position who does not possess the established minimum qualifications therefor shall occupy the same temporarily for not more than six months without re-appointment or extension.
- Promotions (a) A uniformed member of the PNP shall not be eligible for promotion to a higher position or rank unless he or she has successfully passed the corresponding promotional examination given by the Commission, or the Bar, or the corresponding board examinations for technical services and other professions, has satisfactorily completed the appropriate and accredited course in the PNPA or equivalent training institutions, and has satisfactorily passed the required psychiatric/psychological and drug tests. In addition, no uniformed member of the PNP shall be eligible for promotion during the pendency of his or her administrative and/or criminal case or unless he or she has been cleared by the People's Law Enforcement Board (PLEB) and the Office of the Ombudsman of any complaints proffered against him or her, if any.
(b) Any uniformed member of the PNP who has exhibited acts of conspicuous courage and gallantry at the risk of his/her life above and beyond the call of duty, shall be promoted to the next higher rank: Provided, That such acts shall be validated by the Commission based on established criteria.

The special promotion which is accorded to uniformed personnel for display of conspicuous courage and gallantry at the risk of his life above and beyond the call of duty is a recognition of one's outstanding performance and it motivates personnel to work hard for the organization. Some personnel risk their lives to be worthy for the special promotion, which is truly difficult to achieve. It commands respect and emulation if honestly done but when improperly dispense with, this could result to demoralization and dissatisfaction among the police personnel.



This third mode of promotion was thought to be abused when granted to those PNP personnel who participated in quelling violence on May 1, 2001 when Malacañang was under siege by anti-government demonstrators. It was said that some PCOs and PNCOs who got promoted were not able to satisfy fully the provisions of Section 38 of RA 8551 on this particular situation. One survey respondent expressed disappointment that he was not granted this promotion when he was one of those PNP personnel who defended Malacañang. It seems he was forgotten by his commanding officer.

As for the normal promotion system, the four requirements are: Education, Training, Eligibility, and Time and Grade. To some PNP personnel much as they would want to attend the required training in order to be eligible for promotion, they cannot, unless their commanding officer gives permission and if they can be accommodated in the classes organized by PNP for the purpose. Likewise, even if they want to pursue a masteral degree on their own, they cannot just do so without permission from their higher ups. Another difficulty is the nature of their assignments; if they are given a mission or assigned in another area at any given time, then they cannot pursue their studies. Some enterprising personnel though who are really desirous of getting ahead in the organization band together and organize classes parallel to the PNP-sponsored classes paying out of their own pockets.

The announcement of DPRM regarding the promotion program signals the start of the processing of promotion. Sometimes some regions receive this announcement late. This is critical because the duration is set and the time needed to produce the required documents might take a long time. For example, a PNP personnel's previous assignment was Mindanao and he studied there but now he is assigned in Region 3, he needs to go to Mindanao to request for certification that he was assigned there for certain duration and secure his school records to prove he has studied there.

Another difficulty mentioned during the IDA is the submission of many supporting papers for review, some of which already reside in the DPRM's data bank. Still another problem for those potential promotees is securing clearances from the OMB, NAPOLCOM, PLEB, the courts, etc. According to the PNP personnel interviewed, it is "normal" for the police to have cases filed against them in the course of doing their police functions; e.g. dismantling illegal structures per order of the mayor or governor, arresting offenders (even if they are "somebody"). It has also been their experience that trumped-up cases are filed against them because they arrested this "somebody". If such cases are held against them, then they will never be promoted.

Outside of the PNP organization is the interference/influence exerted by politicians by virtue of RA 8551. This is particularly exercised in the appointment of Chief of Police and Director in the Provincial Police Office. For some insiders, they aver that this has greatly affected the unity of the organization and the authority of the chief PNP, thus adversely affecting police independence.

The activities in this process seen to be vulnerable are the Pre-processing phase (e.g. information about the start of the processing of promotion is received late by some areas, which is critical because of the time needed to procure all the papers needed), the Board interview, and the final Board deliberation. All of these are at risk for bias, abuse of discretion, and fraud.



Recommendations:

The following are recommended:

- Review existing documentary requirements; the kind of documents needed to support the application for promotion and the number of requirements needed to be produced by the applicant
- Documentation of the Board interview and the final Board deliberation.

Lateral Entry

The recruitment for Lateral Entry is done only at the National Headquarters. This starts when DPRM declares the quota for lateral entry for approval of NAPOLCOM then publishes the approved quota for lateral entry in accordance with RA 7-41 known as the publication law.

The Screening Committee conducts preliminary screening, which involves initial assessment of the applicants' papers as to appropriateness of education, experience, training, eligibility requirements, and security clearance vis-à-vis qualification standards for the position and personal interview. The DPRM conducts the qualifying examination while the Technical Committee conducts Physical Agility Test (PAT). For the conduct of Psychological and Neuro-Psychiatric Test, the PNP General Hospital is tasked to do this as well as the complete Physical and Medical & Dental Examination. On the other hand, the Crime Laboratory conducts the drug test. The DIDM conducts character and background investigation of the applicants.

After which, the Lateral Entry Board conducts the final interview and then the final deliberation and selection of highly qualified candidates for appointment. The result of this final deliberation is posted in strategic places in the PNP for 15 days. The final list is submitted to the Chief PNP for approval 5 days after the last day of posting. Once approved by the Chief PNP, this is submitted to the NAPOLCOM for confirmation. After confirmation, the DPRM issues the appointment of the recommended candidates.

Findings and Comments:

The activities in this process that are deemed to be vulnerable to corruption are: the initial screening of applicants (paper/document screening and personal interview) being done by the Screening Committee, the conduct of the final interview, and the final deliberation and selection of qualified candidates for appointment.

There are safeguards or control mechanisms in place; such as the presence of a NAPOLCOM Representative in all the steps of the process, strict adherence to Memo Circular 2003-010 re Prescribing the Guidelines and Procedures for Lateral Entry of Officers into the PNP. However, the following risk factors have been identified: favoring personal/political recommendees, limited base of selection, bias, fraud, and inappropriate grant of waiver.



Recommendations:

The IDR Team has the following recommendations:

- Documentation of the procedures being conducted; especially the interview and the final deliberation
- Documentation of deviations from procedures
- Consider the presence of a third party observer during the process
- Consider the possibility of getting the Board to execute an oath of undertaking to hold them administratively/criminally liable for any irregularities, acts, or omissions that are detrimental to the interest of the police service and its uniformed personnel during their tenure

Overall, the following additional recommendations may be considered by the PNP:

- Creation of a Schooling and Training Board that will regularly review the quality and appropriateness of the PNP mandatory courses, the effectiveness of its methods, and competency of instructors, etc.
- Strengthening of the implementation of the PNP Career Management and Development so that personnel who should undergo mandatory training are ordered to do so and not dependent on the decision of the immediate supervisor; and those who are qualified for promotion get promoted without too many obstacle courses to navigate
- Improvement of records management and data banking at DPRM so that some documentary requirements for promotion would no longer be produced by the applicant but may be supplied by the office
- Adoption of Special Operating Procedure for the conduct of Interview to serve as guide for ethical standards in holding the final interview
- Practice of transparency in the conduct of these HR Management functions



CVA Area 2: Whistleblowing and Internal Reporting

The Philippines has as yet no whistleblower law that protects the rights of whistleblowers and gives incentives to them. Although whistleblowing is considered as a fast way to detect corruption, this is not yet institutionalized in many organizations. This is so in the case of the Philippine National Police. Whistleblowing is also a concept that is not looked upon with favor by the PNP. However, there are systems in place in PNP that take care of concerns, grievances, misdemeanor or wrongdoing of personnel in the organization. The PNP has a Grievance Mechanism, an Internal Affairs Service, and the services of the DIDM.

Grievance Mechanism

The Philippine National Police has a built-in system for handling grievances from its members. A Memorandum Circular provides for the creation of Grievance Committees under each police offices, identifies what may be the subject of the grievance, and prescribes the procedure for its resolution. The grievance machinery provides a venue for filing complaints that do not amount to any criminal or administrative offense.

Interviews with key informants reveal that grievance proceedings are very seldom resorted to by members of the PNP. There is no statistics showing the number of grievances handled by the Grievance Committees in the police offices where the analysis was conducted. In PRO 7, for example, there is only one case brought to the Grievance Committee there since its creation and it only concerns a non-uniformed personnel. Although no attempt was made to explain the trend, some sectors do not consider the Grievance Committees as effective listening posts for complaints. The statistics or lack of it suggests a seeming lack of confidence of PNP members on the efficacy of these committees to act upon complaints or produce concrete results. It may also suggest a lack of awareness on the existence of the machinery.

Under the rules, a PNP member who has a legitimate grievance may first present it orally to his immediate supervisor. If the subject of the grievance is his immediate supervisor, he may present it to the next higher official without bypassing the chain of command. The immediate supervisor or next higher official acts on the grievance within three (3) days. If the person complaining is not satisfied, he presents a written complaint to his immediate supervisor or next higher official who in turn submits the same to higher channels within the organizational unit within 48 hours. These higher officials act upon the complaint within five (5) days or recommend that the complaint be subjected to grievance proceedings by the Grievance Committee.

The procedure for handling grievances uniform in all police offices is outlined below:

Although not very likely, there is a risk that the people or group of people resolving the grievance may have bias or prejudice against the person complaining. They may view that person as merely griping and, thus, become indifferent to his cause because griping, according to some interviewees, is generally frowned upon. In some instances, the people or group of people to whom the grievance is presented may neglect or even refuse to act for a number of reasons. If these happen, the person complaining may lose his trust and confidence on the system for handling grievances.



The grievance procedure appears to have no safeguard against bias, prejudice or indifference and merely presumes that immediate supervisors or next higher officials are of unquestionable integrity. Appointments to the Grievance Committee, moreover, do not follow specific standards for integrity, probity, sincerity and credibility although these are made criteria in the appointment. The designation of some members of the Grievance Committee, for example, is fixed by the rules on the basis of the position they are holding.

The rules, nevertheless, prescribe certain periods within which to act on the grievance for each step of the process. This is a built-in safeguard against official inaction by the people mandated to act on grievances. Surprisingly, the rules do not prescribe sanctions in case of non-compliance with the periods.

It is also possible that the immediate supervisor or next higher official cannot implement his recommendations because they require the intervention of officials higher in rank. The Grievance Committee may also have their recommendations set aside by the commander if he disagrees with the decision.

The Grievance Committee as a procedure summons the parties involved to a hearing, which is actually a conference. If the party complained against occupies a position of higher rank or ascendancy than some or all of the members of the committee, it is likely that he would exert an undue influence upon the committee to decide in his favor or subject the person complaining to various forms of harassment. There is no mechanism that guarantees the independence of the Grievance Committee. The grievance procedure also affords no protection against possible harassment.

The procedure for handling grievances, nevertheless, provides additional remedies to the person complaining in case he is dissatisfied with the resolution of his grievance by his immediate supervisors or next higher officials or by the committee. The mechanism provides for review by higher channels within the organizational unit or appeal up to the Chief PNP.

There are other listening posts within the Philippine National Police for airing concerns that may or may not necessarily be considered grievances such as issues about their promotion and place of assignment, financial claims, other perennial problems, and employee morale. Police Non-Commissioned Officers, for example, may present issues concerning their general welfare to the Office of the Command Executive Senior Officer (OCESPO), which is equivalent to the Sergeant Major in the military. The CESPO is supposed to be shielded from undue influence by commissioned officers because he reports directly to the Chief PNP. His office, however, only receives complaints filed by PNCO's against another PNCO's, but does not resolve them. In the Regional Police Offices, there is the Office of the Regional Executive Senior Officer (ORESPO). The RESPO reports directly to the Regional Director. Meanwhile, grievances from Non-Uniformed Personnel (NUP) against fellow NUP's are generally coursed through the NUP Affairs Section (NUPAS).

The office of the Executive Senior Officer and the NUPAS, however, are merely listening posts and have not been capacitated to resolve grievances. Although in PRO 7, for example, the parties involved are usually called to a conference, these offices are, however, not capacitated to act on complaints with the same efficiency as the formal grievance machinery. On the other hand, those grievances wherein the involved parties cross ranks are ordinarily brought to the Grievance



Committee for resolution and the office of the Executive Senior Officer and NUPAS become mere liaisons.

Despite the existence of machinery for redress of grievances, there appears to be no clear mechanism for handling complaints from anonymous police officers who do not wish to be identified in order to be spared from possible harassment or retribution. Ordinarily, complaints coming from anonymous sources are merely put on file and no serious attempt is made to look into the matter alleged in the grievance.

Recommendations:

The following reforms are hereby recommended to further improve grievance handling in the Philippine National Police:

- Conduct various campaigns to make the members of the PNP aware of the grievance mechanism;
- Capacitate the Office of the Executive Senior Officer and the NUPAS to resolve grievances involving personnel under their jurisdiction;
- Prescribe specific standards for integrity, probity, sincerity, and credibility for appointments in the Grievance Committees;
- Prescribe certain sanctions against immediate supervisors/next higher official and members of the Grievance Committees who fail or refuse to comply with the prescribed procedure in handling grievances;
- Adopt a procedure for treating grievances coming from anonymous sources within the PNP.

Summary Dismissal Proceedings

The procedure for summary dismissal of erring police officers normally runs as follows. A complaint sufficient in form and substance is filed with the proper disciplinary authority. In the Philippine National Police, disciplinary authorities are either internal or external. Internal disciplinary authorities include the chiefs of police, provincial directors and their equivalent in the regional support units, regional directors and their equivalent in the national support units, and the Chief PNP. While these internal disciplinary authorities have concurrent jurisdiction over erring police officers, they differ, however, in the penalties that may be imposed. Only the Chief PNP, regional directors and their equivalent have the authority to decree the dismissal of a police officer from the service.

After the complaint is filed, the disciplinary authority or the summary hearing officer designated evaluates the case if it falls under the rule on summary dismissal. If not, pre-charge investigation is conducted and the complaint goes through the usual summary hearing procedure. Otherwise, the disciplinary authority or the summary hearing officer proceeds to evaluate if there is *prima facie* evidence, absent which the case is dismissed. He then issues an order for the respondent to answer within three (3) days from receipt thereof. On the basis of the evidence on record and the



answer of the respondent, the disciplinary authority or the summary hearing officer renders a decision after conducting a summary hearing. If the verdict is returned adverse to the respondent, he may file a motion for reconsideration within three (3) days from receipt of the decision.

Deciding a case is a matter of appreciation of evidence. There is no hard and fast rule in weighing the pieces of evidence; deciding a case is purely an exercise of discretion. Although the disciplinary authority or the summary hearing officer is bound by the rudiments of administrative due process, it cannot be gainsaid that human factors such as whims, caprices, and arbitrariness, usually come into consideration when deciding a case. Hence, the primary risk attending proceedings such as this is abuse of discretion on the part of the disciplinary authority or the summary hearing officer.

Abuse of discretion works either way for or against the respondent. Although there is no documented case of clear abuse of discretion in the sites surveyed, it still remains a high risk. There are accusations that some hearing officers can be bribed to decide a case one-way or the other. There are also claims that some hearing officers are motivated by ill will in deciding cases. In some instances, some hearing officers abuse their discretion out of sheer ignorance of the law or procedure. But these are at the very most only anecdotal, if not hearsay, as there is no statistics supporting them in the sites surveyed.

Nevertheless, the risk that a case is decided not on pure merits is something that the PNP should take into consideration. In its Anti-Corruption Plan, case fixing in administrative investigations is one of the identified corrupt practices. Counter-measures proposed include the strengthening of case tracking system and the review of existing procedure.

There are existing controls, however, to minimize if not prevent the risk. In the first place, the disciplinary authority or the summary hearing officer is bound by the rudiments of administrative due process. Their decision is in writing and states the facts, evidence and applicable laws or rules relied upon in drawing conclusions. Hence, they are ordinarily not expected to reveal any form of whim and caprice in their decision. Moreover, the recommendations of the summary hearing officer are reviewed by the disciplinary authority and the approved decision may be corrected on appeal by the NAPOLCOM Appellate Boards.

Delay in the resolution of cases and motions for reconsideration is also an identified risk either due to non-observance of the periods prescribed or faulty system of notifying the respondent. In the sites surveyed, however, this appears a problem seldom encountered in view of the efficiency with which summary dismissal proceedings are conducted. But some respondents affected by decisions to dismiss usually complain of violation of due process for their failure to receive summons, decision, and order pertaining to their motion. Nevertheless, the rules on summary dismissal proceedings prescribe certain periods and requirements to be followed.

Recommendations:

The following reforms are hereby recommended to further improve summary dismissal proceedings and even ordinary summary hearings conducted by a disciplinary authority or summary hearing officer:

- Designate summary hearing officers of proven integrity and probity and with background in law;



- Enhance the investigation skills of disciplinary authorities or summary hearing officers who are not lawyers or have no extensive background in law;
- Strengthen case monitoring system and records management;
- Improve the system for process serving and mailing.

Pre-Charge Investigation and Summary Hearing

The Internal Affairs Service receives complaint against a police officer ordinarily from the general public although it is the same machinery for internal reporting within the PNP. It was created under Republic Act No. 8551 amending certain provisions of Republic Act No. 6975. The Internal Affairs Service, although part of the PNP, is an independent and autonomous unit empowered to act on matters within its jurisdiction without having to wait for instructions from the Chief PNP.

To guarantee its independence, R.A. 8551 allows the Internal Affairs Service to have a separate manning and staffing pattern, promotion system, seniority lineal list, and career development system. This means that any PNP personnel who join the IAS may not thereafter join any other unit in the PNP. Under Executive Order No. 101, the IAS is mandated to develop its separate programs on retirement and separation benefits, financial and budgetary management, and logistics management and service.

Moreover, under R.A. 8551, the head of the IAS called the Inspector General shall be a civilian appointed by the President. Appointments of personnel are made by the Inspector General based on a career pattern and criteria promulgated by the NAPOLCOM.

The Internal Affairs Service is, in reality, not completely independent from the PNP. For one thing, the Inspector General is appointed by the President upon the recommendation of the Chief PNP. His deputy and the heads of local IAS are ranking members of the PNP. At present, its offices are housed within the compound of police regional, provincial, district, and city offices. About 87% of its workforce is composed of uniformed personnel on “semi-permanent” detail from the PNP and they cannot be easily pulled out without a clearance from IAS. Its decisions are merely recommendatory and subject to concurrence by the PNP disciplinary authorities. Moreover, it depends on the PNP for logistics support.

Personnel of the IAS are entitled to monthly Occupational Specialty Pay equivalent to half their base pay. Interviews with various personnel in the different survey sites showed, however, that the release of this amount is irregular and uncertain. In RIAS 7, for example, the personnel complained that they have not received their pay since 2005.

Most of the summary hearing officers are not lawyers. Per policy, however, they must have a background in law, but not necessarily graduates of Bachelor of Laws or any intelligence course. Uniformed personnel designated as summary hearing officers must have a rank of at least SPO1. But an SPO1 may not conduct the summary hearing of the case of an SPO2 or higher.



To shield the hearing officers from possible undue influence from their peers, the local IAS does not conduct the summary hearing of police officers belonging to the same province, district, or city. For example, the Cebu Provincial IAS does not conduct the summary hearing of police officers belonging to Cebu Provincial Police Office. But it can conduct the summary hearing of police officers belonging to the Regional Mobile Group, Mandaue City Police and Cebu City Police.

When a complaint is filed with the Internal Affairs Service, it undergoes what is known as pre-charge investigation. Within three (3) days from receipt of complaint, the pre-charge investigator notifies the respondent and directs him to submit his counter-affidavit and other documents in support of his defense. On the basis of the evidence on record, the pre-charge investigator evaluates the case for the purpose of determining the existence of probable cause. He then prepares an investigation report, which he submits to the Regional IAS for automatic review.

When the Regional IAS finds probable cause, the case is assigned to a Summary Hearing Officer for the conduct of formal hearing. Otherwise, the case is dismissed with notice to all parties. The complainant may appeal the case to the National IAS.

The designated Summary Hearing Officer issues a summons requiring the respondent to file an answer or any responsive pleadings within five (5) days from receipt thereof. Upon submission, he sets the case for pre-hearing conference, which has the same agenda as a pre-trial in cases brought to court. Thereafter, the case is set for formal hearing if there are facts material to the case that need to be clarified. Otherwise, the case is deemed submitted for resolution. The parties may submit their position paper or memorandum. Forthwith, the Summary Hearing Officer submits his investigation report to the Inspector General or Regional IAS for decision. The decision is forwarded to the proper disciplinary authority for disposition and implementation.

Abuse of discretion on the part of the summary hearing officer is an identifiable risk. The possibility that a case is decided one way or the other not purely on merits is high. In the first place, the compensation package for lawyers and investigators of IAS follows the salary standardization law and is generally unattractive, unlike their counterpart in the Office of the Ombudsman, PAGC, and DOJ. This lends them vulnerable to bribery to augment their income. Although they are entitled to the Occupational Specialty Pay, the irregularity and uncertainty in its releases make it unreliable in preventing the commission of bribery. Moreover, the IAS does not have a customized code of conduct for its summary hearing officers. Although the office has a well-crafted mission-vision statement that alone does not suffice to determine what behavior is allowed under the circumstances. Furthermore, most of the summary hearing officers and pre-charge investigators, especially in the regional and provincial offices, are organic members of the PNP. Hence, it is not impossible that camaraderie, which is strongly observed in the PNP, may affect the investigations and hearings.

Delay in the investigation of the case is another risk factor despite the summary nature of the proceedings. There are many features of NAPOLCOM Memorandum Circular No. 2001-013 (Rules of Procedure in the Investigation and Disposition of Administrative Complaints Against PNP Members before the Internal Affairs Service) that lend it vulnerable to this risk. A perusal of the rules reveals that the respondent is made to answer twice for the same charge, one during the pre-charge investigation and two, during the summary hearing proper. Probable cause is determined twice, first by the provincial/district/city IAS and second, by the Regional IAS on automatic review of the findings of the local office. The pre-charge investigator can require the appearance of the



parties for clarificatory questioning; the summary hearing officer can also require them to appear for a formal hearing if there are facts material to the case that need to be clarified. Two investigation reports are prepared for the Regional IAS: one prepared by the pre-charge investigator and the other by the summary hearing officer, for his review and approval. Decisions of the regional IAS still need the concurrence of the disciplinary authority contributing to further delay. When the complaint is against a senior superintendent or higher, prior clearance is first obtained from the Office of the President through the Executive Secretary and the disciplinary authority will have to submit the records of the case with the investigation report to the Office of the President, through the NAPOLCOM, for final disposition.

Nevertheless, there are existing controls within the rules to minimize the delays. Each step in the investigation of the case must be completed within a prescribed period of time. The pre-hearing conference allows for the simplification of the issues, stipulations of facts, and marking of evidence designed to save time. Whether or not these are complied with was not revealed during the interviews in the different sites.

In RIAS 7, according to key informants, the workload consists of an average of 10 cases a month. In Cebu Provincial IAS, the workload is 2 to 3 cases a month. The low volume of cases received does not exert any pressure on the investigating staff that would otherwise contribute to any delay.

Harassment of the complainant and his/her witnesses is another risk factor. In internal reporting, it is possible that the complainant is a police officer of lower rank than the respondent. The ascendancy of the respondent over the complainant may be taken advantage of to prejudice or affect the outcome of the case. The IAS, however, has no mechanism to protect the complainant from possible harassment except placing the respondent under preventive suspension. This is no guarantee, however, considering that the respondent can still exert influence on his colleagues. Besides, the preventive suspension is only for a limited period.

Recommendations:

The following reforms are hereby recommended for adoption to improve the adjudication of administrative cases filed with the Internal Affairs Service:

- Adopt a customized code of conduct for personnel of the IAS especially for pre-charge investigators, summary hearing officers, and even its prosecutors;
- Review NAPOLCOM Memorandum Circular No. 2001-013 (Rules of Procedure in the Investigation and Disposition of Administrative Complaints Against PNP Members Before the Internal Affairs Service) with the end in view of simplifying the rules to remove repetitive or duplicate activities in the adjudication process; and
- Enhance the investigation skills of the pre-charge investigators, summary hearing officers, and prosecutors of the Internal Affairs Service.



CVA Area 3: INTERFACE WITH THE EXTERNAL ENVIRONMENT

The Corruption Vulnerability Assessment involving the IDR dimension Interface with the External Environment of the PNP focuses on the following transactions: (1) Motor Vehicle Clearance which is being issued by the Traffic Management Group as part of its function in enforcing traffic laws and regulations in the country; (2) Permit To Carry Firearms Outside Residence (PTCFOR), which is exclusively issued by the Office of the Chief PNP, as provided for by Section 7 of Presidential Decree no. 1866; (3) Processing of New Explosives License/Permit, which is being issued by the Firearms and Explosives Division (FED) for firearms, ammunitions, explosives, and firecracker/pyrotechnic devices; and (4) License to Operate Private Security Agencies cover private security agencies, company guards, and license of security guards, the issuance of which is the responsibility of the Security Agencies and Guards Supervision Division.

1. MOTOR VEHICLE CLEARANCE (Traffic Management Group)

The Traffic Management Group (TMG) is one of PNP's Operational Support Units that enforces traffic laws and regulations in the country. It has national and regional offices throughout the country.

The TMG is also responsible for the issuance of a motor vehicle clearance to the public for purposes of registration, transfer of ownership, change of engine/chassis, change of color, change of body design, for shipment, record check and permit to assemble.

The Motor Vehicle Clearance Certificate (MVCC) is a certificate, which verifies that the vehicle is not among those reported stolen or "carnapped". A Motor Vehicle Clearance is a mandatory requirement of the Land Transportation Office (LTO) for motor vehicle registration.

Schedule of Fees

Schedule of appropriate fees for securing a clearance is printed at the back of the PNP Motor Vehicle Clearance Application Form. Payment of these fees should be made at any nearest Land Bank branches.

Below are the fees to be paid depending on the purpose for securing a clearance:

Purpose	Rate
New registration	
• Car/Truck/AUV/Wagon/Imported/Recruit	P200.00
• Motorcycle	100.00
Record check	100.00
Change chassis	100.00
Change body design	100.00
Change engine	100.00
Change color	100.00
For shipment	100.00
Permit to Assemble	150.00



Purpose	Rate
Transfer of ownership	100.00/per transfer
Physical inspection	100.00
Other payment	10.00

Process in Securing Motor Vehicle Clearance

Step 1: Submission of documentary requirements by the applicant. The documents are received in the Receiving Window.

In the National Headquarters (NHQ), the Motor Vehicle Clearance Office (MVCO) of the TMG, has four (4) windows, classified as follows: Windows 1 and 2 are for Receiving, Window 3 is for Rebuilt, and Window 4 is for Lost/Stolen Plate, Recovered, and Re-stamping.

List of documentary requirements for applicants for MVCC is provided at the back of the Application Form.

Step 2: Receiving PNCO reviews documents submitted by the applicant.

The Receiving PNCO reviews the documents submitted by the applicant, check on its completeness and authenticity. If the documents are incomplete, the Receiving PNCO either returns the same to the applicant with the instruction of completing the same or he may issue an Order of Payment (Step 3) and instruct the applicant to complete the documents after payment is made.

The perceived risk factors in this stage are: (a) that the documents submitted are fake; and (b) abuse of discretion by the Receiving PNCO. Although there is a possibility of receiving fake documents and there might be abuse of discretion on the part of the Receiving PNCO, the likelihood of occurrence is not high.

In order to control such risks from occurring, the following mechanisms are observed: (a) original documents are required to be presented; and (b) strict compliance with the requirements.

Step 3: Issuance of Order of Payment (OP).

After the Receiving PNCO reviews the documents and finds the same to be complete and in order, he issues the Order of Payment to the applicant, in order for the latter to make payment at the nearest Land Bank branch.

Step 4: Applicant submits the OP to Land Bank and pays the corresponding fee.

The applicant now proceeds to the nearest branch of Land Bank, presents the Order of Payment, and then pays the corresponding fee.

The schedule of fees is posted inside the MVCO and it is also reflected at the back of the Application Form.



After the applicant has paid, the bank issues a Special Bank Receipt (SBR). The applicant will present the SBR as proof of payment (Step 5).

Based on the interview at the NHQ, problems encountered are always long bank queues and frequent system offline at the Landbank, which would result to a half-day, waiting period for their clients. This is a common complaint brought to PNPs attention.

To expedite bank payment, TMG recommends that the Clearance Station Head should be allowed to sign a temporary SBR in case that the LBP is off-line.

Step 5: Applicants returns to the MVCO and presents the Special Bank Receipt (SBR).

After payment and issuance of the SBR, the applicant returns to the MVCO and presents the SBR as proof payment. The Receiving PNCO then puts his initial on the SBR if the documents are complete.

If the documents are incomplete and the applicant was nevertheless issued an OP and instructed to pay, he must present the completed documents together with the SBR. The Receiving PNCO once again reviews if the documents submitted are complete. If the documents are complete, the Receiving PNCO now refers the applicant to the Crime Laboratory for the Macro-etching of the engine and chassis number.

Step 6: Macro-etching of the Engine and Chassis Number of the Motor Vehicle.

The Crime Laboratory, Crime Lab for brevity, conducts the macro-etching of the engine and chassis number of the motor vehicle.

Stencil aides are doing the Macro-etching of the motor vehicle, but they do not sign on the Macro-etching Certificate. The authorized signatory of the certificate is the Crime Laboratory Technician.

In the NHQ and NCRPO, the stencil aides are not organic personnel of the Crime Lab, they are mere volunteers. They have no contract of employment whatsoever with the Crime Lab and they do not receive any kind of remuneration for the services they render. The number of stencil aides deployed in the various MVCOs in Metro Manila varies. The Crime Lab Technician is tasked to supervise the stencil aides.

On the other hand, in the Regions (Davao and Cebu), macro-etching is being done only by authorized Crime Lab Police Officers who are trained to do the job together with a TMG Police Officer. They enforce this rule strictly ever since, because they saw that the task is a critical function of their Unit and should be performed solely by their uniformed personnel.

This stage of the process is highly vulnerable to the abuse and fraudulent mechanisms of the stencil aides, particularly in allowing the non-appearance of the motor vehicle. Since the stencil aides are non-organic members of the Crime Lab, the PNP has no administrative control and supervision over them. They are accountable to no one. And they cannot be held accountable for any misconduct in macro-etching because they do not sign any document nor do they issue any form of receipt or certificate for that matter.



There were several guidelines prepared and disseminated by Headquarters TMG at Camp Crame in relation to the issuance of Motor Vehicle Clearance Certificate. The guidelines were crafted for purposes of reminding the Units concerned on the proper processing of MV clearance and to remedy the malpractice of allowing the non-appearance of motor vehicles.

Some of the related issuances are as follows:

- Memo from Chief, MVCO dated June 1, 2006, subject: Reminders on Proper Processing of MV Clearance;
- Memo from OIC-TMG dated October 15, 2005, subject: Issuance of MV Clearance;
- Memo from Chief, MVCO dated September 27, 2005, subject: Insufficient Amount of SBR
- Memo from Chief, MVCO dated February 11, 2004, subject: Non-appearance of Motor Vehicle
- Memo from OIC-TMG dated May 20, 2003, subject: Additional Guidelines re Issuance of MVCC
- Memo from Director, TMG dated October 28, 1997 re Streamlining of PNP MV Clearance Procedures

Even with the existence of these guidelines for the proper processing and issuance of the MVCC, compliance to the said guidelines is not strict, particularly by the stencil aides, since there is an absence of compulsion on their part to do so, given that the nature of their stint is voluntary. Case in point is the incident in TMG Pasay where stencil aides were caught on camera asking for a certain amount of money for the processing of the MVCC without bringing in the motor vehicle for macro-etching.

The occurrence of the non-appearance of motor vehicle, is, however, not high in the regions, since the Crime Labs there do not make use of the services of stencil aides.

During the interview in PRO XI (Davao City), the team was informed that the TMG – MVCO there, particularly the Crime Laboratory there has earned the reputation of being able to restore to the original state those vehicles whose chassis numbers have been tampered with. Vehicles from neighboring regions will be brought to their office for macro-etching. The TMG at PRO XI prides itself as being a highly proficient in macro-etching. This should be emulated by all PROs.

Step 7: The applicant returns to the MVCO and submits the documents together with the Certificate of Macro-etching, for initial processing.

After the conduct of the macro-etching, the applicant returns to the MVCO and submits the Certificate of Macro-etching to the Receiving PNCO. The documents are now ready for initial processing.

Initial processing consists of the following tasks: (a) numbering; (b) organizing into folder; and (c) the issuance of a claim stub. All of these are done by the Receiving PNCO.

This process is also being practiced at the Regional Offices of TMG.



Step 8: The numbered folder now goes to the Management Information Section (MIS) for encoding and printing of the MVCC.

After the initial processing, the numbered folder now goes to the MIS for encoding and printing of the MVCC.

At this stage, the counter checking of documents are being done by the Processing PNCO. An initial on the certificate would be placed to signify that it passed the verification of the Processor.

Errors in encoding may occur, but the likelihood of such occurrence is low. Step 9 serves as the control mechanism for this particular risk factor.

Step 9: The numbered folder now undergoes final processing by the Processing PNCO

The numbered folder, now containing the MVCC, will be subjected to final processing by the Processing PNCO. Final processing consists of (a) review of the completeness and authenticity of the documents, and (b) checking of the details, especially the data and numbers encoded in the clearance certificate.

If errors are found on the certificate, the Processing PNCO makes corrections on the clearance certificate and returns it to the MIS Encoder for retyping and printing. If no corrections are made, then the certificate will be forwarded to the Processing Officer and Clearance Officer for their signatures.

Step 10: Issuance of the Motor Vehicle Clearance Certificate

Before TMG releases the MV Clearance Certificate, the applicant should present his/her claim stub to the Releasing Section of TMG. The Releasing PNCO would record the details of the certificate such as: name of owner, type of motor vehicle, plate number, engine number, chassis number, and the control number.

All these information were written in a logbook and photocopies of the supporting documents were retained and stored at the TMG Office for safekeeping and future retrieval.

Controls and Records Keeping

The use of a logbook is also one of the control mechanisms that PNP-TMG uses in their regular transactions to document the flow of records or documents from one step to another. Major descriptions of transactions can be found in the logbook to support integrity of the process and the document.

A specified area for storing the records is being maintained by the TMG Units but unfortunately based on our field visits in the NHQ and in the Regions (Davao and Cebu) these storage facilities are in disrepair and dilapidated state.

NOTE: Processing and issuance of the Motor Vehicle Clearance Certificate could be done in one-day, if documentary requirements submitted are complete and authentic.



Recommendations:

Based on the interviews conducted by the assessing team, there are two areas, which need improvement. One, in order to address the problem of long queues and “offline” incidences at the LBP, the team recommends that the Clearance Station Head be allowed to sign a temporary SBR. To prevent abuse of this discretion, a confirmation from the LBP should be made mandatory before the Station Head can sign the temporary SBR.

The second area for improvement concerns the utilization of stencil aides in the macro-etching of the engine and chassis numbers, particularly in the NHQ and NCRPO. Currently, the nature of their relationship with the Crime Laboratory is purely voluntary. They are not employees of the Crime Lab, and they receive neither compensation nor allowance for their services. This arrangement becomes highly vulnerable to corruption, *i.e.* the stencil aides will resort to “fixing”, just to earn money.

The team therefore recommends that the stencil aides be employed as non-uniformed personnel of the Crime Lab or as project or contractual employees in the least. If the stencil aides are employed by the Crime Lab, either as NUPs or as project or contractual employees, the Crime Lab exercises administrative supervision over them, and therefore they can be held liable for any misconduct. Their employment will likewise minimize, if not deter, the incidence of corruption in the form of “fixing”, because they will be entitled to compensation.

It should be noted that during the time of General Panfilo Lacson, the stencil aides were casual employees of the Crime Lab. They were given Six Thousand Pesos (P6,000.00) a month. If it was possible then to employ them as casual employees, the team sees no reason why they can’t be employed as casual employees now.

Finally, the team highly recommends for the rehabilitation or renovation of the MVCOs in the regions. The physical condition of the TMG regional and provincial offices is pitiful. As observed by the team during its site visit, the TMG Provincial Motor Vehicle Clearance Division in Tagum City and the TMG Regional Office in Davao City only has one computer for the printing of the clearance. The TMG Provincial MVCD has no telephone line, no proper storage area for their records and the personnel pay for the electric bill out of their own pockets.

It should be emphasized that the Motor Vehicle Clearance is one of the income generating services of the PNP. The working environment and the well being of its personnel should not be neglected by management. Providing for better working environment, such as improved workstation with additional computers, metal filing cabinets for record keeping, and adequate budget for office maintenance, is highly recommended. By providing better working environment, personnel will have no reason to render poor service therefore the end result will be improved quality of service to the public.



2. PERMIT TO CARRY FIREARMS OUTSIDE OF RESIDENCE (Office of the Chief of PNP)

Permit To Carry Firearms Outside Residence (PTCFOR) is exclusively issued by the Office of the Chief PNP, as provided for by Section 7 of Presidential Decree no. 1866, as amended, “*PTCFOR – is written authority issued to any person by the Chief Constabulary (now Chief PNP) which entitles such person to carry his licensed or lawfully issued firearms outside of residence for the duration and purpose specified therein*”. Applications for PTCFOR coming from the different regions are received at the respective Police Regional Offices (PROs) and then forwarded to the National Headquarters (NHQ) for proper processing.

Schedule of Fees

Below are the appropriate fees that the applicant should pay to secure the permit:

APPLICANT	RATE
Elected Officials Governor and up Vice Governor down	PTCFOR ID Card Fee P150.00 PTCFOR Fee P1,000.00 + P150.00
High-ranking government officials – Presidential Appointees	PTCFOR ID Card Fee P150.00
AFP/PNP (Active/Reserve – On AADT or WEADT)	PTCFOR ID Card Fee P150.00
AFP/PNP (Retired)	PTCFOR ID Card Fee P150.00
Government Employees	PTCFOR Fee P4,000.00 PTCFOR ID Card Fee P150.00
Businessmen/Private Individuals/Professionals	PTCFOR Fee P4,000.00 PTCFOR ID Card Fee P150.00
Senior Citizens	PTCFOR ID Card Fee P150.00

Process in Securing Permit to Carry Firearms Outside of Residence

Step 1: Filing of Application Form for PTCFOR

The applicant should get and fill-out the application form from the Receiving Section of the PTCFOR Office. Together with this application form, the applicant should bring with him/her some of the documentary requirements to complete the application. One of the major documents to be presented is the applicant's letter of request for the issuance of a permit to carry address to the Chief, PNP.

The list of requirements for different types of applicants is provided at the back of the application form, together with the corresponding fees.

After accomplishing the application form, the applicant submits the same, together with the documentary requirements to the Receiving PNCO. At the NHQ, Windows 1 and 2 are for Receiving, Window 3 is for the Issuance of the Order of Payment (OP), and Window 4 is for Releasing.



Step 2: Receipt and Preliminary Review of Documentary Requirements for PTCFOR

The Receiving PNCO, upon receipt of the application and supporting documents would check on the completeness and authenticity of the documents. An action form would be placed on top these documents to reflect the remarks of the Receiving Officer. This action form also serves a checklist – it contains a list of all the documents required for the issuance of the PTCFOR.

If the application and the attachments are found to be complete, then it will be forwarded to the Chief Clerk for approval of the application.

This stage in the process is highly susceptible to “fixing” (facilitation of the application for a certain sum of money). There is also a possibility of applicants submitting falsified documents or the documents submitted are incomplete. However, the probability of such occurrence is low.

To address the issue on “fixing”, a checklist of the documentary requirements reflected at the back of the application form and the action form attached to every application submitted serve as control mechanisms, not only against fixing, but also against falsified and incomplete documents.

Step 3: Signing/Approval of PTCFOR Application

The Chief Clerk, upon receipt of the application form and documentary requirements, would check on the completeness thereof before he/she signs on the application form.

Indiscriminate approval of applications is the perceived risk factor in this stage of the process. There is no existing control mechanism to address this. Although the likelihood of occurrence of the said risk is low, still, a control mechanism should be put in place so that the OCPNP may protect itself against possible abuse by its personnel.

Step 4: Preparation of Matrix of Approved PTCFOR Applicants

After the Chief Clerk has approved the application, a matrix of approved applications is prepared by the encoders. This matrix is the one forwarded to the CPNP for his approval.

Step 5: Issuance of Order of Payment for C, PTCFOR’s Signature

The Receiving PNCO now issues an Order of Payment (OP) to the applicant. This Order of Payment is computer generated.

Step 6: Payment of PTCFOR Fee at Land Bank

After the applicant secures the OP, he now proceeds to the nearest Land Bank branch to pay the corresponding fees. A Special Bank Receipt (SBR) is issued to the applicant.

The common complain of the applicants is the long queues at the bank. At times, they have to be in line for a good 2 or 3 three hours.



Step 7: Issuance of PTC Control Number

After the applicant has secured the SBR, he now returns to the PTCFOR Office and submits the SBR for the initial of the Chief of the PTCFOR Office. Then the application will be forwarded to the Chief Clerk for the issuance of a PTC control number.

Step 8: Printing of PTCFOR ID Card

After the Chief Clerk assigns a control number for the application, the said application is now ready for the printing of the PTCFOR ID Card.

But before the PTCFOR ID Card is printed, the application is forwarded to the encoder, for the recording of information like when the application was filed, how much was paid, the control number, scan the picture and thumb mark of the applicant. After that, the ID card will now be printed.

Errors in the encoding of the data are perceived to be a risk factor. However, the likelihood of its occurrence is low. Nevertheless, to address this issue, the Chief Clerk counter-checks the data reflected in the ID card before the same is released.

Step 9: Signing of the PTCFOR by the Chief of the PNP

The signature of the CPNP is already computer-generated, so once the ID card has been printed, the signature of the CPNP is already there.

Step 10: Release of Printed PTCFOR ID Card to Applicants/Authorized Representative

The ID card is now ready for release to the applicant or whoever is the authorized representative to claim the license.

Controls and Records Keeping

The use of a logbook is one of the control mechanisms that the PTCFOR Office uses in their regular transactions to document the flow of records or documents from one step to another. Major descriptions of transactions can be found in the logbook to support integrity of the process and the document.

Records are kept at a designated area. They are arranged chronologically and are bundled by months.

Recommendations:

All in all, the process is highly efficient and expeditious, leaving only a little room for improvement. Management should emphasize the “No Fixers” policy by posting slogans to such effect around and within the premises of the office.

The team also recommends that the schedule of fees be posted within the premises of the office for easy reference by the applicants.



Finally, the team recommends that a third party reviews and check the completeness and authenticity of the documents submitted by applicants to further reduce the incidence of incomplete and/or fake documents.

3. NEW EXPLOSIVES LICENSE/PERMIT (Firearms and Explosives Division)

The Firearms and Explosives Division (FED) is responsible for the issuance of permits and licenses of firearms, ammunitions, explosives, and firecracker/pyrotechnic devices. FED is located at PNP National Headquarters Camp Crame, Quezon City. It has regional offices located nationwide.

However, applications for new license/permit and renewals of the same coming from the regions are not processed therein. The regional offices merely receive the applications and documents and indorse the same to the National Headquarters for processing and approval. Inspection of the warehouse, however, is conducted by the regional office.

The license issued by FED is a mandatory requirement of the Bureau of Customs for dealers or buyers who would transport or move explosives from one place to another.

License Fees

Explosives and Explosive Ingredients	Fees
Dealer's License	P15, 000.00
Manufacturer's License	25,000.00
Purchaser's License	5,000.00
Foreman's/Blaster's License	2,500.00
Pyrotechnic and Firecrackers	
Manufacturer's License	P5, 000.00
Dealer's License	2,500.00
Retailer's License Fee	1,000.00
License for Fireworks Display Operator	1,000.00
Permit to Transport Pyrotechnics/Firecrackers	360.00
Permit Fee to Display Fireworks	1,000.00/show
Permit Fee to Import Theatrical Effects	6,000.00

Process on Securing License/Permit for Explosives

Step 1: Filing of Application and Submission of Documentary Requirements

The applicant fills up the application form and prepares the documentary requirements to be submitted to FED. The list of requirements, with corresponding fees, is provided at the back of the application form for easy reference.

The flow chart of the process and the schedule of fees are also posted outside the FED office for quick reference by the transacting public.



Step 2: Review of Documents for Completeness and Authenticity

The Receiving PNCO, upon receipt of the application form with attachments, checks if the documents are complete. If the documents are incomplete, the Receiving PNCO will provide a notation to the applicant as to what documents are missing.

Abuse of discretion on the part of the Receiving PNCO may arise, but the probability of that is low. Nevertheless, control mechanisms are put in place to avert any incidence of abuse or corruption. Strict compliance to the requirements is being enforced and the “No processing of incomplete documents” policy is being implemented. Reminders on these policies are posted within the FED.

Step 3: Issuance of Order of Payment (OP)

If the documents submitted by the applicant are complete, then the Receiving PNCO issues an Order of Payment (OP), directing the former to pay at the nearest branch of the LBP.

Step 4: Payment of Fees at Land Bank

The applicant now proceeds to the nearest LBP, presents the OP and pays the corresponding fee.

Common problem encountered by applicants is the long queue at the LBP. This delays the process as the applicants wait in line for 2 or 3 hours. It is, therefore suggested, that a special arrangement with LBP be made to prioritize transacting clients of PNP to avoid further delay in the processing of their applications.

Step 5: Issuance of Special Bank Receipt (SBR) by Land Bank

After the applicant has paid the fee, the bank now issues a Special Bank Receipt (SBR), which the former presents to FED as proof of payment.

Step 6: Submission of Application with Attached SBR

After the applicant secures the SBR, he now returns to FED and present the SBR together with all the documents to the Processing PNCO. The latter checks the payment made and the documents submitted by the former.

The SBR attached to the application from and other documents serves as a control mechanism since it does not give the Processing PNCO the discretion not to process the application since proof of payment has already been presented. Furthermore, a logbook is used to document important details of the transaction. Each station has a logbook, and a control number is given for each item received.

Step 7: Issuance of an Acknowledgement Receipt

The Processing PNCO issues an acknowledgment receipt to the applicant after he completes checking the documents. To signify that the Processing PNCO has checked the documents and has issued the acknowledgment receipt, he stamps on the application form or letter of request. The



processor determines what type of license is being secured, and whether it's a new one or a renewal. If the application is for the renewal of the license, the application goes to statistics for determination of the quantity of the explosives and determines the rank of the company among those who have renewed their licenses.

Step 8: Processing of Application and Endorsement for Approval

After issuing the acknowledgment receipt, the application is now ready for processing. The application will be endorsed for approval, through a recommendation attached thereto, signed by the Chief of FED and the Director of CSG.

Step 9: Routing of Application for Approval of Authorized Signatories

The application together with the recommendation will now be routed to the proper and authorized signatories for approval – C, EMB-TDO, C, FED-TCDS, and D, CSG-DCO. If the application is for a new license, the Chief PNP must approve the application. After the approval of the Chief PNP, the application is returned to EMB.

“Fixing” or facilitation of the application for a fee is likely to occur, but such possibility is at the minimum. To avert this possibility from occurring, “NO FIXERS” warning signs are posted within the vicinity of the FED office.

Step 10: Receipt of Approved Application and Preparation of License/Permit

After the authorized signatories have signed and approved the application, the Processor now prepares the license/permit. The receipt of the approved application is documented using a logbook. A number is assigned for each application indicating the date of approval.

Step 11: Routing of License/Permit for Approval of Authorized Signatories

The application will now be routed again for the signature of the Chief of FED and the Director of the CSG.

Once again, “fixing” may occur but the possibility is low. To stem or prevent such occurrence, the routing slip must bear the initial of the Chief of FED; a memorandum addressed to the Director of CSG is attached, advising the latter that the Chief of FED has approved the application. Furthermore, strict compliance to the “NO FIXERS” policy is being implemented.

Step 12: Release of Approved License/Permit

After the authorized signatories have approved the license/permit, the same is now ready for release to the applicant. To claim the license/permit, the applicant must present the letter bearing the stamp received by FED and an authorization letter in case the claimant is a mere representative of the applicant.



Comments and Observations:

All in all, the process seems methodical, but it is protracted. According to the process owner, it takes about one (1) month to process a new license and it takes about one (1) week to renew an existing license. The transaction time varies because it depends on the availability of the signing authorities.

However, in spite of the protracted nature of the process in FED, the office should still be commended for its effort to boost the morale of its personnel through the Honor Roll given every month, and for its initiative to promote values formation through the conduct of Bible study every Wednesday. These, indeed, are laudable practices of the FED that should be emulated by all other offices in the PNP, not just in the NHQ, but also in the PROs.

In addition to these commendable efforts, FED has also developed its own citizen's feedback mechanism. They came up with their own comment form. They hand out these forms to clients, collect them, and then deliberate on the comments made by the clients. This can be considered as best practice because it allows FED to assess its performance based on its stakeholders' opinion.

Conversely, FED has encountered problems in its operation. According to the Chief of FED, they have problems on the liquidation of explosives covered by the license. Liquidation of the explosives is a requirement before renewal of license can be had. Even with the corresponding penalty of revocation of license for non-compliance with the liquidation requirement, some dealers do not renew their license because of the stringent process and because they cannot fully liquidate the explosives covered by their existing license. Validity of the license is only one (1) year. So coupled with the problem of non-liquidation is the non-renewal of the licenses by some dealers.

Another problem of FED is the lack of proper storage facility for explosives, particularly pyrotechnics, confiscated by authorities. This problem should be addressed immediately by management to protect the life and limb of all concerned personnel. Improper storage of explosives, pyrotechnics, and other highly combustible materials endangers not only the property of PNP, but also more importantly, the lives of the people working within the vicinity of the improper storage facility.

Lastly, the Chief of FED opined that additional manpower for their unit will be highly beneficial, because it would help in fast tracking the process of issuing licenses and permits.

Recommendations:

Given the lengthy nature of the process, resulting in the non-renewal of licenses by some dealers, the team recommends, per consultation with the Chief of FED, that the validity of the licenses and or permits be extended – instead of one (1) year, the license could be valid up to three (3) or five (5) years.

It is also recommended that a proper storage facility for explosives and pyrotechnics be constructed, for the safety of the people working within the vicinity of the current storage facility.



Finally, the team recommends for the improvement of the office layout of FED. The current office layout of FED is functional but an improvement thereof will greatly benefit, not only the staff working therein, but also more importantly the transacting clients.

4. LICENSE TO OPERATE - PRIVATE SECURITY AGENCIES (Security Agencies and Guards Supervision Division)

The Security Agencies and Guards Supervision Division (SAGSD) is responsible for the issuance of the License to Operate (LTO) private security agencies, company guards, and license of security guards. SAGSD is located at the National Headquarters of PNP. It has regional offices all over the country.

However, applications for LTO coming from the regions are processed at the NHQ. The regional offices merely receive the applications and endorse the same to the NHQ for proper processing.

Process in Securing License to Operate Security Agencies

Step 1: Filing of Application and Submission of Requirements

The applicant fills up the appropriate application form and secures all the necessary documents.

Step 2: Receipt and Review of Application

The Processing PNCO, upon receipt of the application with attached documents, reviews and checks the completeness of the documents submitted. He attaches the Routing Slip, and he signs the same, to begin the routing of the application to the proper step or stage each time.

Acceptance of incomplete documents is likely to happen, but the possibility is low. Strict compliance to the SAGSD requirements is being enforced. Incomplete documents will not be processed.

Step 3: Issuance of Order of Payment

After the Processing PNCO checks and finds everything in order, he issues an Order of Payment (OP) to the applicant, and directs the latter to pay the fee at the nearest LBP branch.

Step 4: Payment of Corresponding Fees and Security of Special Bank Receipt

The applicant now proceeds to LBP and pays the corresponding fee. The bank will issue a Special Bank Receipt (SBR) after the applicant has effected payment.

Step 5: Submission of Application with SBR to SAGSD

When the applicant has secured the SBR from the bank, he now returns to SAGSD and submits the application together with the SBR as proof of payment. The entries in the SBR are encoded in the computer database and a record of the application is made using a logbook.



Step 6: Preparation of Memorandum

The Processing PNCO now prepares a memorandum for the endorsement of the application to the proper signatories. He signs on the routing slip to signify that the content of the memorandum is correct and in accordance with established procedures.

Step 7: Verification of Records/Documents

The Records Section now verifies the authenticity of the documents submitted by the applicant.

Abuse of discretion on the part of the Records officer may occur, but such possibility is minimal because the Chief of the Records Section affixes his signature on the routing slip, making him liable for any irregularity committed in the verification process. Additionally, all transactions are recorded in a logbook.

Step 8: Verification of the Status of the License to Operate (LTO)

The Complaint and Investigation Section of SAGSD will verify the status of the LTO, particularly those applications for renewal of the license. Their comments or findings are noted on the application or in case of renewals, on the license itself. The Chief of the Complaint and Investigation Section signs on the routing slip before the application is forwarded to the next step.

Step 9: Administrative Inspection

An inspection team from the Enforcement Section will now conduct site inspection, which includes inspection of the number of personnel and inspection of the equipment.

Abuse of discretion on the part of the inspection team is likely to occur at a medium level. Republic Act No. 5487, otherwise known as the Private Security Agency Law, as amended by Presidential Decree No. 11, is the governing law on the organization and operation of private detective, watchmen or security guards agencies. Strict compliance to the said law and other rules and regulations issued to implement said laws are observed.

Photo and/or video documentation of the inspection conducted is recommended. This will serve as an effective and persuasive evidence to support the findings of the inspecting team.

Step 10: Endorsement of Application to the Chief of SAGSD

After inspection is conducted, the application will be endorsed to the Chief of SAGSD for his signature on the license. The Assistant Chief of SAGSD is responsible for securing the Chief's signature on the license and on the routing slip.

Step 11: Endorsement to the Director of the Civil Security Group (CSG)

The Chief of SAGSD will endorse the license to the Director of CSG, for the latter's signature on the license. He again signs on the routing slip before the license is actually transmitted to the CSG.



Step 12: Endorsement of Application (Memorandum) for Higher Authorized Signatories

The Director of CSG prepares a memorandum endorsement addressed to higher authorities for their corresponding concurrence on the license. He signs on the routing slip before the license is actually endorsed to higher authorities.

Step 13: Concurrence of the Assistant Director for Operations, NHQ

The Assistant Director for Operations must concur and affix his signature on the memorandum.

Step 14: Concurrence of the Chief Directorial Staff

After the Assistant Director for Operations has concurred, the Chief Directorial Staff must give his concurrence by signing on the memorandum as well.

Step 15: Concurrence of the Deputy Chief for Operations

After the concurrence of the Chief Directorial Staff, the Deputy Chief for Operations must concur and sign on the memorandum as well.

Step 16: Approval of the License to Operate by the Chief PNP

Finally, the license will be forwarded to the Chief PNP for his approval.

Comments and Observations:

The process is so lengthy and requires more than ten (10) signatories to complete the transaction. Because of the numerous signatories, transaction time becomes unpredictable as it depends on the availability of the signatories, especially those outside of the Civil Security Group (CSG).

Although the process is protracted, the agency is not without good practices that should be mirrored by other offices. The layout of the SAGSD office is very organized, complete with signages for the convenience of the applicants. The windows are marked clearly so that applicants will be able to follow which window to go to next. The schedule of fees together with the list of requirements is posted just outside the door of the office. "No Fixers Allowed" or "No Fixing" slogans are likewise posted inside and outside the office, to give emphasis on the "no fixing" policy of the office.

Recommendations:

The team recommends the use of photo or video documentation of the site inspection to support findings of the inspection team.



GENERAL RECOMMENDATIONS

SAFEGUARDING INTEGRITY OF SYSTEMS

The PNP has the necessary management systems in place. There is a need to safeguard the continued existence of these systems and the conduct of regular review for their improvement. Particular systems referred to are those of HR Management, Financial Management, Procurement, Performance Management, and Interaction with the public. It is suggested that the PNP consider the following:

- Review the processing of promotion and strengthen areas that may be at risk for fraud, bias, and abuse of discretion, starting with the review of the documentary requirements for applying for promotion
- Setting up more objective standards and parameters for criteria in performance evaluation
- Modernization of revenue-generating units (facilities, equipment). These money-generating units should always have systems upgrade to make its operations faster and fool proof.
- Set doable time standards for processing of transactions. Although there are timelines indicated in the flow charts, sometimes these are not realized because of factors outside of the control of PNP e.g. payment of fees to Land Bank.
- Rotation or limitation of tour duty of key PNP personnel assigned in revenue-generating units, comptrollership, finance service. This could prevent too much familiarity with clients or systems.
- Networking of database with LTO (because of the processing and issuance of the motor vehicle clearance) and other government agencies to benefit from each other's information.
- Make PNP website more interactive so that it can be made a platform for reporting wrongdoing/corruption, information dissemination, praising policemen who are noteworthy, etc.

ENHANCING INDIVIDUAL INTEGRITY

The policeman is faced with situations where he or she has to make instant decisions on the best course of action. This is said to be addressed by their training right after qualifying for POI but a large part of this is determined by the character of the policeman/woman. It is therefore suggested that PNP:

- Look into enhancing new recruits course to build up personal integrity
- Strengthen police education so as to improve competency in police work; e.g. training of new recruits in conduct of police duties (many POI with cases filed against them despite the manual)
- Provide training and capability building of senior officers (Superintendent and higher) on corruption risk management



ENHANCING INSTITUTIONAL INTEGRITY

The PNP has a customized Code of Conduct that is well deployed and regularly reviewed. This should be maintained because this may be considered a best practice of the organization. The PNP has been known to be unflinching in carrying out investigation of its men and officers and meting out sanctions. In addition, the following suggestions may also be considered:

- Strengthen the independence of the Internal Affairs Service (IAS)
- Rotation of IAS Investigators and Summary Hearing Officers (tasks and place of assignment)
- Conduct service satisfaction survey of clients on a yearly basis (as input to strategic planning)
- Improve physical set up of police stations and sub-stations
- Provide policemen with facilities and equipment needed in their field operations
- Institute policy reforms to improve the remuneration of the policemen and to keep them well-compensated and motivated
- Install mechanisms to prevent political exploitations of the police institution