

**CAYMAN ISLANDS IMMIGRATION DEPARTMENT
STANDARD OF CONDUCT**

POLICY STATEMENT

It is the policy of the Immigration Department (ID) to treat all its customers and staff fairly, regardless of race, colour, ethnic or national origin.

We will treat people as individuals and our staff have clear instructions to behave towards everyone in a manner that is courteous, impartial and free of racial bias.

It is the policy of the Immigration Department that whilst discharging our duties under Immigration Legislation, we will treat every person equally, fairly and impartially, using only reasonable force, where this is warranted; when utilizing our powers of arrest.

The Immigration Department is committed to a policy of equal opportunity and development, for all our employees, as well as those who seek to be employed by us; in accordance with Personnel Service Law and Regulations.

It is the policy of the Immigration Department that employment and promotion depends upon demonstrated ability, qualification and fitness for the work. No person will be placed at a disadvantage, by virtue of conditions or requirements which are unreasonable and cannot be shown to be justified.

The Immigration Department observes a policy of zero tolerance in relation to conduct by our staff which brings the reputation of the department into disrepute.

It is the policy of the Immigration Department that its staff should not seek or receive preferential treatment because of their employment with the department. Employees should never use their position to threaten or intimidate a member of the public to act, or omit to act in a manner favorable toward themselves, members of their family or their associates.

All employees are required to familiarize themselves with this policy and it is the duty of individual managers, supervisors and members of staff; to ensure that this policy is implemented and strictly adhered to.

Section 1

1. Complaints Section – Staffing and role

All letters of complaints from the public should be addressed to:

**Chief Immigration Officer
Department of Immigration
P.O. Box 1098
George Town
Grand Cayman**

- 1.2 Complaints shall be the responsibility of the Deputy Chief Immigration Officer (Administration) who will ensure that all the complaints are investigated in a prompt, proper and timely manner. In furtherance of this, the DCIO, may either by himself, or else by an officer designated by him, in writing; conduct any or all enquiries connected with any matter or complaint received.
- 1.3 Upon the completion of any such investigation, the DCIO may, if necessary, consult with the Chief Immigration Officer in order to determine the appropriate action to be taken, if any.

2. Sources of Complaints

1.2. Letters of complaint may come from the following sources:

- a. The Filing Registry: who will forward, to the DCIO, letters of complaint received by the Department; on matters which appear to relate to this area of responsibility.
- b. The Chief Secretary's Office, Deputy Chief, Sec. Office and other Government Departments that may from time to time, forward letters of complaints; sometimes directly to the Chief Immigration Officer.
- c. Letters of complaints which are received in relation to matters which occurred at the Ports, or other areas within the Department shall be forwarded by the Assistant Chief Immigration Officer responsible for the Section in question; to the Deputy Chief Immigration Officer Administration. All such complaints must be recorded in an "in/out" mail system.

3. Procedure to be observed when handling complaints involving the Immigration Department.

1.3.1. It is the function of the Complaints Section to assure Ministers, Senior Government Officials and the public that complaints against members of the

Immigration Department will be treated seriously and that they will be fully and impartially investigated. Further, that prompt remedial action will be taken, where individuals, or procedures, are found to be at fault.

1.3.2. The Chief Immigration Officer together with the Deputy Chief Immigration Officer (Administration) will jointly review the complaints received by the Section annually and prepare a report of their findings for the information of the Deputy Chief Secretary.

1.3.3. The highest standards of courtesy and professionalism are required of Immigration Department staff and in the vast majority of cases these standards are fully met. However, it is essential that investigations into the conduct of staff be seen to be consistently thorough, impartial and handled in an open and straightforward manner. Whenever there are complaints, which are found to be substantiated, that the required high standard of conduct has not been met, an appropriate apology will be offered and, where necessary, financial recompense. An aggrieved party, should also be given an indication, of the steps that have been taken; to prevent a recurrence of that conduct by staff. By so doing we will demonstrate that we are concerned with maintaining high standards and that those standards are open to public scrutiny.

4. What are the 'High Standards' that are required?

AT IMMIGRATION CONTROL (PORTS):

1.4.1. An Immigration Officer is constantly in contact with the public, passengers, company officials, seamen and others. They must maintain a proper and courteous relationship with these persons. An Immigration Officer is usually the first Cayman Islands government official met by travelers. He/she has an obligation to attend promptly, to the clearance of passengers entering or leaving the country and must always ensure that his appearance and manner provides no cause for complaint. He/she is required to act fairly in the exercise of his/her powers and duties under Immigration Legislation. An Officer must never act in excess of those powers and must show strict impartiality at all times. His/her objective, always should be; to exercise the Immigration control procedures efficiently without unnecessarily hindering travelers.

1.4.2. Officers working in the Enforcement Section, who often visit places of work and private residences, should always bear in mind the need for particular sensitivity in such situations which can be stressful for all concerned. They must maintain the highest standards of professionalism, fearlessness and courtesy, in the discharge of their duties in such circumstances.

AT ALL IMMIGRATION SERVICE CENTRES:

1.4.3. Every Immigration official, should always be mindful, that members of the public have a right to expect not only that their affairs will be dealt with discreetly, courteously, effectively and expeditiously but also that their personal feelings, no less than their rights as individuals; will be fairly and impartially considered. Their contacts with officials should therefore be made as pleasant, professional and businesslike as possible. In this regard, no passenger, or

customer should be kept waiting unduly and any temptation to rebuke, any such individual; should always be resisted by the attending official.

CONSUMPTION OF ALCOHOL:

1.4.4 The consumption of alcohol, even in relatively small quantities can impair efficiency, cloud judgment and lead to behavior which can, even unwittingly, cause offence. Common sense and moderation should, at all times be exercised. In any event, Immigration Officers and other staff should never consume alcohol during working hours, or after hours; whilst wearing their uniforms. It should also be borne in mind, that smoking is prohibited in Government Buildings and at the Airport.

DEALING WITH ALLEGATIONS OF RACISM:

1.5.1. The Immigration Department is committed to a policy of equality of treatment, of all persons with whom it has dealings, including its own staff, regardless of race, color, religion, ethnic or national origin and to the elimination of discrimination on these grounds in its working environment or in the provision of its services. This policy is set down in our policy statement (see policy statement no.1), which is displayed in our offices, to which the public has access, including the ports, and Immigration Headquarters. All members of staff are required to behave towards everyone in a manner which is courteous, impartial and free of racial bias. The department will not tolerate any incidents of racial prejudice or discrimination by word or conduct on the part of any member of staff or contracted staff.

Moreover, every manager and member of staff has a duty to ensure that by his/her influence and example; these requirements are fully and positively met. Members of staff, who are applying the Immigration Law, must always be mindful, that any appearance of prejudice can be deeply offensive to the person with whom they are dealing and damaging to the effectiveness, public perception and acceptability of the immigration control being applied. The Complaints Section will assess any complaints of racist conduct, against the background of these criteria, and a very serious view will be taken of any failure to meet them. Where any allegation in this regard is substantiated, disciplinary action may be taken against staff.

5. COMPLAINTS WHICH CONTEMPLATE THE AWARD OF FINANCIAL REDRESS:

1.6.1 The Complaints Section will scrutinize all claims for compensation made to the Immigration Service, even where such cases do not directly relate to formal complaints about conduct or inefficiency. For example, where it is acknowledged in advance, that a passport or travel document has been negligently lost whilst in our custody, funds will be made available, to the aggrieved party for a replacement. In all such cases, a report should be submitted, by the officer who is immediately supervising the immigration official, directly or indirectly linked to the loss or misplacement, as soon as practicable to the Deputy Chief Immigration Officer, Administration giving full details of the claim and the circumstances, which gave rise to it. A clear indication should also be given, as to whether or

not; an ex gratia payment is justified. The Deputy Chief Immigration Officer, is required to first obtain the approval of the Chief Immigration Officer; before offering any financial compensation in this regard.

SECTION 2

PROCEDURE TO BE OBSERVED WHERE THE COMPLAINT IS CONCERNED WITH A PENDING MATTER:

2.1 What happens if someone complains, whilst the matter concerning him/her his or her case is at the time, being dealt with; by the Immigration Department or any of its subsidiary Boards?

2.1.1. From time to time members of the public will wish to make a complaint about some aspect of the immigration processes. There may be any number of reasons for this, as well as valid explanations for what occurred, but many persons, will at various times; feel a genuine sense of grievance.

2.1.2 Immigration Officers, or officials, should not seek to exacerbate a difficult situation by entering into a heated discussion even if the person concerned appears to be genuinely under a misconception, or is behaving unreasonable. A calm rational approach is required and if this does not resolve the situation the complainant should be directed to a Senior Immigration Officer, an Inspector or another Supervisor who will endeavor to defuse the situation and explain the relevant procedures. If necessary an apology should be offered, if only for the fact that the person concerned is clearly dissatisfied and uncompromising. Where that person still wishes to pursue a complaint to the department, he should be advised to put his complaint in writing to The Chief Immigration Officer, Department of Immigration, P.O. Box 1098, George Town, Grand Cayman.

2.1.3 Where it is anticipated that such a complaint may be made, full details of the incident should be recorded locally, without delay; by the official involved. All staff, including interpreters, who may have been involved with the incident and others who witnessed it, should be asked to provide their (brief) comments, in writing; so that there is a record of what occurred. This is an invaluable aid for those who have to respond (including immigration officers) if a formal complaint is later made. Assistant Chief Immigration Officers and Supervisors within respective sections of the Immigration Department are expected to keep a chronological log of noteworthy incidents; which occur in relation to their respective sections.

2.1.4 In the event of persons being detained or arrested for any reason whatsoever, it is also vitally important that minutes on file are (legibly) signed, timed and dated, by the officer concerned. All offers, of access to legal advice, meals and refreshment, including a refusal to accept such offers, or any other incidents of note; MUST be fully recorded.

2.1.5 THE FOLLOWING MATTERS ARE AMONGST THOSE, WHICH MAY PROPERLY BE DEALT WITH AT THE BORDER CONTROL, ENFORCEMENT OR AT HEADQUARTERS BY AN ASSISTANT CHIEF IMMIGRATION OFFICER:

- (a) queries which can be answered by quoting or referring to published instructions, statistics, statutes etc.,
- (b) advice to correspondents as to where they may obtain the information they require,
- (c) enquiries relating to the normal business of the section (including complaints about procedures).
- (d) enquiries regarding the need and the procedures for obtaining entry clearance, e.g. visas
- (e) enquiries from persons directly involved in casework being currently dealt with by Immigration Officers.

2.1.6 If an answer can conveniently be given by telephone and this would be cheaper than the time costs involved in producing a letter this should be done provided that the complainant is content with this approach. A written record should be kept of the conversation. When a letter is sent the Assistant Chief Immigration Officer must ensure that the standard of drafting and typing is good, and that the reply is sent without delay.

2.1.7 In all cases dealt with by the Assistant Immigration Officer a copy of the reply and any relevant papers should be forwarded to the Deputy Chief Immigration Officer (Administration) when action is completed so that accurate statistics can be maintained, especially in respect of channeling arrangements and delays on the controls.

2.1.8 Assistant Chief Immigration Officers at the Ports or at Headquarters should not, however, deal with, correspondence from the public which relates to:

- (f) complaints about an officer's conduct or decision or about general requirements of the immigration control,
- (g) interpretation of Departmental policies,
- (h) the disclosure of confidential official records such as particulars of persons who have arrived or have been refused entry, (except to authorized persons such as police or customs)
- (i) any other matter, which in the opinion of the Assistant Chief Immigration Officer should be referred to the Deputy Chief Immigration Officer (Administration).

3. COMPLAINTS RECEIVED BY OTHER GOVERNMENT DEPARTMENTS AND AGENCIES

- 3.1 Occasionally complaints are referred to the Immigration Department by other Government Departments and private agencies which can include HM Customs, the Prison Service and Police. The Deputy Chief Immigration Officer (Administration) will take responsibility for sending a reply, by mutual agreement, where the other Department or Agency has no involvement in the complaint (i.e. where the complaint has been misdirected). Where the other Department or Agency is also subject to a complaint, to which they wish to respond in their own way, the Deputy Chief Immigration Officer (Administration) will offer a contribution for the final reply covering all relevant aspects of Immigration Department involvement in the matter. Alternatively it may be decided, by mutual agreement, that a separate reply from each body is more appropriate (e.g. from the Police) in which case the Deputy Chief Immigration Officer (Administration) will mention this in the reply.

4. COMPLAINTS MADE BY MLA'S

- 4.1 Complaints received from MLA's must be forwarded directly to the Deputy Chief Immigration Officer Administration.

5. WHAT IF THE COMPLAINT IS REALLY ABOUT ANOTHER AGENCY?

- 5.1 Other agencies have close contact with the public at the seaport and airports and the Immigration Department is often the recipient of complaints, which should really have been directed elsewhere. Such bodies include police officers, assisting or being assisted by immigration officers in the course of their duties. In some cases a complaint may have been completely misdirected to the Immigration Department. However, the Deputy Chief Immigration Officer (Administration) is committed to reply and where part of the complaint relates to Immigration Department staff an investigation will proceed in the normal way.
- 5.2 The approach to the other agency's involvement will, however, vary. In most cases it will be appropriate for both the investigating officer and the Deputy Chief Immigration Officer (Administration) to deal with this aspect by making reference to the other body in the reply and explaining that its officers/employees will have been acting under their own separate powers/instructions. Where it is not appropriate for the Immigration Department to comment on the actions of another agency the complainant should be advised to pursue the matter with (for example) the Commissioner of Police or HM Customs. However there will clearly be circumstances where it will be considered more proper for the Deputy Chief Immigration Officer (Administration) to bring the involvement of the other agency to the notice of its officers and for the Deputy Chief Immigration Officer (Administration) to say this has been done in the reply, perhaps with the added undertaking that the agency concerned will write to the complainant where such a guarantee has been given. Situations like this will arise where a complaint is of a particularly

sensitive nature, where it is likely to, or has already attracted publicity. They may also arise in complaints about a joint Immigration Department/Police operation. The Deputy Chief Immigration Officer (Administration) will also endeavor, when forwarding papers for investigation to Border Control or Headquarters to offer advice on the approach to be taken where it appears from the papers that such difficulties may arise and investigating officers should discuss cases of doubt with the Deputy Chief Immigration Officer (Administration) before proceeding with the investigation.

6. COMPLAINTS AGAINST THE IMMIGRATION DEPARTMENT:

Situations may arise, particularly as a result of enforcement operations, where police officers and immigration officers are the subject of a complaint. Immigration Department investigating officers should bear in mind that police complaints procedures are more formal and elaborate than our own and may involve the Police Complaints Department. In such circumstances it is advisable for the Immigration Department investigating officer to make contact at an early stage with the police officer dealing with the complaint to ensure that there is appropriate co-operation, co-ordination, and liaison. Where a complaint of this type is notified initially to Immigration Department and it becomes apparent in the early stages of an Immigration Department investigation, that police officers who were involved with Immigration Officers are also the subject of a formal complaint, then The Deputy Chief Immigration Officer (Administration) should be kept informed.

6. COMPLAINTS AGAINST CONTRACTOR'S STAFF:

The Immigration Department has a responsibility to ensure that detained persons, as well as their employers, friends and relatives who visit them; are treated properly. Also, that they would possibly wish, to be involved in the investigation of the complaint against their employee or relative, as the case may be. The conduct of Immigration Contractors' Employees, is considered by the said criteria, as those applicable to Immigration Department staff; whilst they are contracted with the Department. The same obligation lies with the contractor, who may wish to carry out his own investigation into a complaint. It is, however, the Immigration Department which has the overall responsibility for persons in its care, or who come into contact with its contractors' employees.

The Department has no objection to contractors' staff having their own staff representatives present at the interview and the same general principles will apply to contractors' staff as apply to ID staff (as outlined in this handbook)

SECTION 3

8. WHO WILL INVESTIGATE THE COMPLAINT?

- 8.1 The Investigating Officer will normally be an Assistant Chief Immigration Officer who has had no previous involvement in the case, although the Deputy Chief Immigration Officer (Administration) may conduct the investigation himself if he thinks the circumstances make this necessary. The investigation of complaints is an important part of the duties of an Assistant Chief Immigration Officer and should be carried out thoroughly and impartially.
- 8.2 Where possible, the Investigating Officer should not be the line manager of the officer under investigation. The ideal person would be someone who does not know the officer concerned but it is acknowledged that, in practice, it will probably be difficult, if not impossible, to find an investigating officer who has had no previous contact at all with the officer concerned, however, someone who is known to them socially should never be appointed.
- 8.3 This is not to say that the opinions and reports of current line managers should not be taken into account; the investigating officer should, however, endeavor to take an objective rather than subjective view of the matter in question

9. HOW SHOULD THE INVESTIGATION BE APPROACHED

GUIDELINES FOR THE INVESTIGATOR:

- 9.1 The object of any investigation is to ascertain if the required high standards have been met. As well as considering the conduct of the officers concerned, investigating officers should also highlight any procedural shortcomings, which may become evident in the course of the investigation and state what has been, or should be done to put them right.
- 9.2 The Investigating Officer will need to familiarize himself with the matters raised by the complaint from the correspondence received. Each element of the complaint, no matter how apparently trivial will have to be addressed in the investigation.
- 9.3 The Investigating Officer should not hesitate to contact the complainant by letter, telephone or a visit, as convenient, particularly where there are areas of doubt, which may require further clarification. Personal contact at a fairly early stage is often very valuable in getting to the root of a problem. An informed explanation can also help clear up misunderstandings, thereby avoiding further lengthy correspondence. It is the aim of the Complaints Section to formulate a reply, which will achieve this objective.
- 9.4 The Investigating Officer will also need to see the case papers and any relevant file(s) prior to interviewing an officer.
- 9.5 All complaints about the conduct of individual officers will normally involve a personal interview with the investigating officer but this should not be used as an opportunity, by the Investigating Officer, to formally discipline or warn an officer about his conduct; where the complaints are thought to be substantiated. This would be a matter for line management after consultation between Deputy Chief Immigration Officer (Administration) and The Chief Immigration Officer.
- 9.6 Whenever possible, the officer to be interviewed should have had an opportunity to see the complainant's letter (and any other relevant papers) in advance of the Investigating Officer's interview. This will enable the officer concerned to collect his thoughts, look at the records and formulate his arguments in reply to the complaint.
- 9.7 Investigating Officers should bear in mind that the usual principles of natural justice are applicable in these situations involving our very own staff, as in similar dealings with members of the public and the interview should therefore be conducted accordingly.

- 9.8 Investigating Officers should bear in mind that many members of staff will be concerned or apprehensive of being the subject of a complaints investigation. In some cases, because of the time factor, the officer, who is the subject of the complaint, may say that he or she is unable to recall the incident(s) in question. The Investigating Officer will then have to consider each case carefully, on its own merit; having taken all these factors into account.
- 9.9 The Investigating Officer should, on completion of his enquiries, submit a full report to the Deputy Chief Immigration Officer (Administration). It may become necessary, to refer some cases back to the Investigator, because the initial report submitted, has not covered all the points raised by the complainant, or has been superficial in its content. The report should also provide an assessment of the complaint, the extent to which, dispassionately expressed opinions will be appropriate. (See also 10. below). It is also important that the investigation be conducted swiftly and forwarded as soon as possible, to the Deputy Chief Immigration Officer (Administration) along with the report.

10. THE INVESTIGATING OFFICER'S REPORT.

The Investigation Officer's report on a complaint should normally ADDRESS all the allegations made. It is often very useful for the Deputy Chief Immigration Officer (Administration) to have some general background information about the circumstances of the individual, at the center of the complaint such as arrival details, computer printouts, etc and copies of these documents, should be included where appropriate.

The report should cover fully, objectively and concisely all aspects of the complaint. Any comments or observations from the officers involved should be included. In conclusion the Investigating Officer may comment on the conduct of staff concerned and refer to any extenuating circumstances or previous involvement in a complaint, if this is relevant, and say whether or not he considers the complaint substantiated.

The Investigating Officer should ensure that the officer at the center of the complaint is fully aware of his conclusions. The Complaints Section, through the Chief Immigration Officer, will normally return the papers to the section within which the officer complained on is assigned, once its action/investigation is complete; so that those concerned can see the final public reply.

Whilst the investigation and compilation of the report must be fair, thorough and comprehensive, the actions associated with the investigation, should be undertaken with the utmost dispatch. The delays inherent in carrying out investigations are appreciated by Immigration Department but every effort must be made to avoid unnecessary delay in handling complaints.

11. HOW LONG SHOULD THE INVESTIGATION TAKE?

The objective should be, for the Investigating Officer to send a reply to the Deputy Chief Immigration Officer (Administration), as appropriate, within 14 days of receipt of the complaint. To ensure that cases are not overlooked, a one-month target date is normally set by the Deputy Chief Immigration Officer (Administration)

within which the report should be completed and a reply sent to the complainant. The Deputy Chief Immigration Officer (Administration) should be contacted in cases where, for unavoidable reasons, it is not possible to meet this target date; in order that he may decide what further action is appropriate.

SECTION 4

MATTERS CONCERNED WITH THE RIGHTS OF THE OFFICER— SUBJECT OF THE COMPLAINT:

12. What happens if someone complains about me?

The number of formal complaints received generally, is very small, in comparison to the number of people who have contact with Immigration Staff. It is the individual officer's responsibility to avoid behavior, which could give rise to a complaint, and to use every skill in order to defuse disputes or potential confrontation. Where a complaint is made, however, an officer must co-operate fully with the investigating officer and be open and honest in giving his/her account of the matter. A considerable number of unsubstantiated complaints, can be said to stem, from disappointment with the Immigration Officer's decision, which can colour the complainant's perception of the officer's conduct. Staff often perceive such complaints as being unfounded, or as an unwarranted attack on their character. Nonetheless, in the interests of the impartiality and openness already described, all complaints do have to be fully investigated so that an appropriate reply can be sent to the complainant.

The Investigating Officer may ask the officer, who is the subject of the complaint, to provide a written response to the complaint but a personal interview will normally still be required, at which further questions may be put to enlarge upon what has been written in the report or to cover matters within which; it has not dealt adequately. A written response may, however, enable such officer, to marshal his/her facts, in advance of the interview and thereby help formulate arguments in defense of his/her actions.

13. CAN A COLLEAGUE BE PRESENT AT THE INTERVIEW?

Yes, in order to:

- (1) reassure you
- (2) advise you on the complaints procedures
- (3) ensure that your rights are respected
- (4) ensure that the complaint is dealt with fairly

The role of a colleague is to ensure that you are aware of complaints procedures, and that you are fairly treated, thus the colleague will not be allowed to influence how you answer questions, which are within your knowledge.

14. WILL I BE INFORMED ABOUT THE OUTCOME OF THE INVESTIGATION?

In some circumstances the investigation officer may be able to give an indication of what his or her findings will be. However, no guarantee can be given that he or

she will be able to do so, as the final outcome may depend on other aspects of the investigation and interviews with other officers. This is in the interest of management and staff confidentiality.

15. WILL I BE SHOWN THE FINAL REPLY TO THE COMPLAINT?

Yes

16. WHAT DISCIPLINARY ACTION MAY BE TAKEN AGAINST ME?

Whether or not a complaint is found to be substantiated, there may well be lessons to be learned by those involved, or it may be, that all that is required is a review of local procedures. This may necessitate changes or modification of departmental or national instructions. In most cases it will be sufficient for local line management to decide how to advise, or warn, an officer following a complaint. However, there may be occasions where it may become necessary, for the Chief Immigration Officer, to invoke the disciplinary provisions of the Personnel Regulations 2006. Staff can be reassured that papers relating to a complaint, will only be placed on an individual's personal file, for reference, as to the outcome of the matter reported. Where formal disciplinary action is contemplated, in all such circumstances, the officer concerned will be advised that this action is being taken. Officers should, however, be in no doubt that disciplinary action will be taken in cases of serious or persistent misconduct or inefficiency and that in investigating a complaint, or assessing overall performance, it may be appropriate to take into account an individual's previous record.

17. WHAT IF I DISAGREE WITH THE CONCLUSIONS DRAWN BY THE INVESTIGATING OFFICER?

The investigating officer should ensure that the officer(s) subject of the complaint, are fully aware of his conclusions but because a number of staff may be involved, it may not always be possible for that officer to see the report in its entirety. Where the investigation of the complaint results in disciplinary procedures being invoked, the officer concerned will have ample opportunity to have his own verbal or written account taken into account and the officer's previous record(if any) made available for that officer's information.

18. CAN I TAKE LEGAL CHARACTER ACTION AGAINST A COMPLAINANT FOR DEFAMATION OF?

This would be a matter for you to decide in conjunction with the procedure set down in Personnel Regulations.

19. DOES THE DEPUTY CHIEF IMMIGRATION OFFICER (ADMINISTRATION) SOMETIMES CARRY OUT INVESTIGATIONS HERSELF?

The Deputy Chief Immigration Officer (Administration) may investigate a complaint himself in the interest of greater impartiality and to maintain familiarity with the problems faced by officers. He may choose to conduct the investigation himself because the complaint(s) made are of a particularly serious nature or have wide ranging implications. He may equally choose to conduct the investigation, on an entirely random basis and officers should not assume that there is any sinister motive behind his involvement, nor should they assume that the complaint is being regarded with greater than normal interest, in a manner that pre-supposes a detrimental outcome; to the officer complained on.