



Professional Standards and Integrity Sub (Police) Committee

Date: FRIDAY, 7 DECEMBER 2018
Time: 1.45 pm
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members: Alderman Alison Gowman (Chairman)
Douglas Barrow (Ex-Officio Member)
Nicholas Bensted-Smith
Tijs Broeke
Mia Campbell (External Member)
Deborah Oliver (External Member)
Deputy Richard Regan
Deputy James Thomson (Ex-Officio Member)
James Tumbridge

Enquiries: Alistair MacLellan / alistair.maclellan@cityoflondon.gov.uk

N.B. Part of this meeting may be subject to audio-visual recording.

Lunch will be served in the Guildhall Club at 1.00pm.

Future Meeting Dates: 11 March 2019 (to be rearranged); 3 June 2019; 9 September 2019; 29 November 2019.

**John Barradell
Town Clerk**

AGENDA

1. **APOLOGIES**

2. **DECLARATIONS BY MEMBERS OF PERSONAL OR PREJUDICIAL INTERESTS IN RESPECT OF ITEMS TO BE CONSIDERED AT THIS MEETING**

3. **MINUTES**

To agree the public minutes and summary of the meeting held on 17 September 2018.

For Decision
(Pages 1 - 4)

4. **PUBLIC OUTSTANDING REFERENCES**

Report of the Town Clerk.

For Information
(Pages 5 - 8)

5. **STAFF SURVEY RESPONSE**

Report of the Commissioner.

For Information
(Pages 9 - 16)

6. **INTEGRITY DASHBOARD AND CODE OF ETHICS UPDATE**

Report of the Commissioner of Police.

For Information
(Pages 17 - 48)

7. **IOPC POLICE COMPLAINTS: STATISTICS FOR ENGLAND AND WALES 2017/18**

Report of the Independent Office for Police Conduct.

For Information
(Pages 49 - 100)

8. **EXCLUSION OF THE PUBLIC**

MOTION – that under Section 100A (4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

For Decision

9. **NON-PUBLIC MINUTES**
To approve the non-public minutes of the meeting held on 17 September 2018.
- For Decision**
(Pages 101 - 106)
10. **NON-PUBLIC REFERENCES**
Report of the Town Clerk.
- For Information**
(Pages 107 - 108)
11. **NON-PUBLIC APPENDIX - STAFF SURVEY REPORT**
Non-public appendix to accompany the public report of the Commissioner regarding the Staff Survey.
- For Information**
(Pages 109 - 136)
12. **PROFESSIONAL STANDARDS STATISTICS - QUARTER 2**
Report of the Commissioner of Police.
- For Information**
(Pages 137 - 166)
13. **CASE SUMMARY**
Report of the Commissioner of Police.
- For Information**
(Pages 167 - 170)
14. **COMPLAINTS BULLETIN - QUARTER 2**
Report of the Commissioner of Police.
- For Information**
(Pages 171 - 184)
15. **GLOSSARY**
Report of the Commissioner of Police.
- For Information**
(Pages 185 - 190)
16. **NON-PUBLIC QUESTIONS**
17. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND THE SUB-COMMITTEE AGREES SHOULD BE CONSIDERED WHEN THE PUBLIC ARE EXCLUDED**

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PROFESSIONAL STANDARDS AND INTEGRITY SUB (POLICE) COMMITTEE

Monday, 17 September 2018

Minutes of the meeting of the Professional Standards and Integrity Sub (Police) Committee held at the Guildhall EC2 at 1.45 pm

Present

Members:

Alderman Alison Gowman (Chairman)
Nicholas Bensted-Smith

Tijs Broeke
Mia Campbell (External Member)

Officers:

Alistair Sutherland	- Assistant Commissioner, City of London Police
Maria Woodall	- Director of Professional Standards, CoLP
Oliver Bolton	- Town Clerk's Department
George Fraser	- Town Clerk's Department
Barry Jarvis	- Chamberlain's Department
Tarjinder Phull	- Comptroller & City Solicitor's Department
Jesse Wynne	- Chief Inspector, CoLP

1. APOLOGIES

Apologies were received from Deputy Richard Regan, Deputy James Thomson and James Tumbridge.

2. DECLARATIONS BY MEMBERS OF PERSONAL OR PREJUDICIAL INTERESTS IN RESPECT OF ITEMS TO BE CONSIDERED AT THIS MEETING

There were no declarations.

3. MINUTES

The Sub-Committee considered the minutes from the last meeting, held on 6 June 2018.

RESOLVED – That the minutes be approved.

4. OUTSTANDING REFERENCES

The Sub-Committee received a report of the Town Clerk that provided Members with an overview of the outstanding actions from previous meetings.

OR1 – Staff Survey Action Plan

It was explained that this would be completed imminently and submitted to the November meeting.

OR3 – CSG & IAG Meeting Dates

It was agreed that Tijs Broeke and Nicholas Bensted-Smith would attend IAG meetings, though Mr Bensted-Smith would not be able to attend the next meeting on 10 October. The Chairman queried whether there had been any progress on the proposed amalgamation of the two groups into one and asked that this action be maintained in order to confirm dates.

RESOLVED – That the report be received.

5. INTEGRITY DASHBOARD AND CODE OF ETHICS UPDATE

The Sub-Committee received a report of the Commissioner that provided Members with an update on the Code of Ethics and Integrity Dashboard.

The Town Clerk provided Members with an update on the current status of the LPCF. It was explained that it would be split into 3 or 4 national groups of which CoLP would be part of the London/South East region of the forum and that there had been positive progress in engaging other regions, regardless of limited progress locally.

The Committee discussed the Integrity Standards Dashboard. The Chairman illustrated their concern that if there were no areas highlighted then it was possible that the focus of measurements needed to be changed. The Assistant Commissioner explained that it would be possible to adjust the narrative to make it more apparent that nothing was being missed and assured Members that this was the case.

The Chairman noted that the due dates for some measures were stated as March 2018 and suggested that these areas might need further focus. She asked that this be fed back to the Head of Strategic Development who had given his apologies, and that the dates be checked. (1)

In reference to measure 2.6, relating to integrity/ethics considerations in recruitment, the Assistant Commissioner explained that the changes referenced in the report represented the final stages of work achieved to ensure that professional ethics are maintained in recruitment.

RESOLVED – That the report be received.

6. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There was no further business.

7. QUESTIONS RELATING TO THE WORK OF THE COMMITTEE

There were no further questions.

8. EXCLUSION OF THE PUBLIC

RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

Item No.	Paragraph(s) in Schedule 12A
9-21	3
17	1,2,3,5

The meeting closed at 3.20 pm

Chairman

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PROFESSIONAL STANDARDS & INTEGRITY SUB (POLICE) COMMITTEE

7 DECEMBER 2018

OUTSTANDING REFERENCES

No.	Meeting Date & Reference	Action	Owner	Status
1.	27/09/18 Item 5 - <i>Integrity Dashboard and Code of ethics Update</i> Measures Due Dates	The Chairman noted that the due dates for some measures were stated as March 2018 and suggested that these areas might need further focus. She asked that this be fed back to the Head of Strategic Development who had given his apologies, and that the dates be checked.	CoLP	DUE DECEMBER 2018
2.	06/06/18 (1) Item 4 - <i>Outstanding References</i> 05/03/18 (7) Item 8 - <i>Staff Survey Update</i> Staff Survey Action Plan	The Sub-Committee noted the content of the report but advised that Members still wanted clarity on the understanding of the Intelligence and Information Directorate and asked for an action plan to be clarified with a report submitted to the next Sub-Committee. It was agreed that Chief Superintendent David Evans should attend. 06-06-18: The Chairman noted that the Detective Chief Superintendent of Intelligence and Information submitted his apologies as was unable to attend the meeting as planned due to a CoLP engagement. The Assistant Commissioner explained that the action plan will be formulated prior to the next meeting. The Chairman requested that it be submitted to the next meeting. 07-09-18: DCS Evans has liaised with the Chairman regarding his non-availability to attend the meeting on the 17th September. The responsibility for producing the action very recently transferred to Strategic Development, who are now leading on its production. Although it is not yet in a complete enough state to submit to the Sub Committee, the work is being completed and details will be provided to your December Sub Committee.	CoLP	DUE DECEMBER 2018

<p>3.</p>	<p>06/06/18 (2) Item 4 - <i>Outstanding References</i></p> <p>05/03/18 (11) Item 9 - <i>HMICFRS PEEL Legitimacy Inspection 2017</i></p> <p>Community Scrutiny Group, Independent Advisory Group Meeting Dates</p>	<p>A Member queried external scrutiny of stop and search, as referenced within Appendix A. The Chairman requested that the Community Scrutiny Group meeting dates be followed up on, alongside those of the Independent Advisory Group.</p> <p>06-06-18: The Chairman asked if the dates had been confirmed for both these groups. The Assistant Commissioner explained that CSG dates had been confirmed, but that the IAG dates had not been for the remainder of 2018. The Chairman asked that the Equality & Diversity Lead should be kept updated with these dates.</p> <p>07-09-18: Upcoming dates confirmed as below. Attendance at both meetings is poor, therefore the Force's Equality lead is currently reviewing this area at the request of the Commissioner and Assistant Commissioner, with a view to amalgamating the groups to form a single scrutiny group for the City of London.</p> <p>Community Scrutiny Group – 26 Sep, 29 Dec Independent Advisory Group – 10 Oct, 9 Jan, 3 Apr, 26 Jun</p> <p>Update 27-09-18: The Chairman queried whether there had been any progress on the proposed amalgamation of the two groups into one and asked that this action be maintained in order to confirm dates</p>	<p>CoLP</p>	<p>OUTSTANDING</p>
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4.	<p>06/06/18 (3) Item 5 - <i>Integrity Dashboard and Code of Ethics Update</i></p> <p>London Police Challenge Forum (LPCF)</p>	<p>The Chairman suggested that it would be valuable for Members to attend the next meeting on 5 July and requested that the Town Clerk circulate the details to Members.</p> <p>A Member asked that the meeting outcomes also be circulated to Members.</p> <p>Update 07-09-18: The meeting on 5th July was not held in the City of London. The next meeting is the 12th September at 10:00 at CH Rolph Hall. Should anyone wish to attend, please RSVP to Paul Adams (Paul.Adams@cityoflondon.pnn.police.uk). Outcomes have still not been provided by the MPS for the panels held so far. This is still being actively pursued by the Head of Strategic Development.</p>	CoLP/ Town Clerk	OUTSTANDING
6.	<p>06/06/18 (4) Item 6 - <i>Questions</i></p> <p>Professional Standards Newsletter</p>	<p>The Chairman requested that the Professional Standards Newsletter be circulated to Members as a matter of course.</p>	CoLP	OUTSTANDING

7.	<p>05/06/17 (13) Item 12 - <i>Integrity Dashboard & Code of Ethics update</i> 01/03/17</p> <p>Staff Survey Indicators on Dashboard</p>	<p>Commissioner to include Staff Survey indicators on future dashboard updates. The Force received a high-level presentation from Durham University on 15th September with an indication that the final report would be received in Force at the end of September, beginning of October. Following receipt of the report, the Force will develop an action plan to address the identified areas of concern (D/Ch Supt I&I to lead). The report and action plan will inform potential measures for the dashboard.</p> <p>16-11-17: Indicators still to be agreed. Following receipt of the full report (which was late but has now been published in full on the force's intranet), Organisational Development has held a series of workshops to explore the findings with staff. The last of these workshops was the 7th November. An information report is being prepared for the next Grand Committee. An action plan is now being developed which will be submitted to the next SMB in December, following which it is intended to include a measure in the Integrity Action Plan.</p> <p>Update 07-09-18: It has previously been reported to the Sub Committee that the Staff Survey results were considered by the Head of Strategic Development and the DCS I&I and there was nothing in the survey that was amenable to use as an integrity indicator for the dashboard. This has been reported to the Integrity Standards Board and is reflected in the Integrity Development Plan. As the action plan, however, is still not complete, it is not possible to say whether it will produce anything that is suitable for dashboard inclusion.</p>	CoLP	<p>ONGOING –</p> <p>Update received 16/11/17</p>
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Committee(s): Professional Standards and Integrity Sub-Committee	Date(s): 07/12/2018
Subject: Staff Survey Response	Public
Report of: Commissioner of Police	For Information
Report author: T/Chief Inspector Luke Baldock, Strategic Development	

Summary

With reference to previous reports to Police Committee, Members will be aware that in September 2017, the City of London Police Chief Officer Team received the results of the Staff Survey. This was run by the University of Durham, who are widely respected as a national leader in Staff Surveys and used by many police forces and other public sector organisations across the country. City of London Police staff and officers were both invited to take part in the survey, and 57% of the workforce completed the survey. This is a very high level of participation compared to many other forces and demonstrates that City of London Police officers and staff are highly engaged and willing to communicate their views.

This report updates Members on plans moving forwards, to take the views expressed by staff and to respond in a way which demonstrates that City of London Police listens to its staff and responds by trying to improve as an organisation.

Recommendation

It is recommended that Members receive this report and note its contents.

Main Report

1.) Background

The full detail of the Staff Survey is attached in a restricted appendix (Appendix A) at the end of this report. This is a highly detailed document and can be used as reference. This update to Members summarises the findings of the report, and the outcome of a series of focus groups held with staff after the publication of the report which adds detail to staff perceptions of issues raised in the main survey.

The Staff Survey results were delivered to the Chief Officer Team in a briefing by the University of Durham. Overall, the Force scored well in many areas. However, there were three main areas in which the force did not score as strongly. These are:

- **Hindrance Factors** – Things which are perceived as annoying and undermine optimum performance.
- **Organisational Fairness** – Also known as Procedural Fairness. This is a perception by staff that certain aspects of Force actions and processes are unfair (for instance selection/promotion processes.)
- **Supportive and Ethical Leadership** – This is a perception that staff do not always feel fully supported by their leaders. Durham University clarified that the Force still scored very highly in this area, but that it was not as strong as other areas of the survey results, and that public sector staff tend to have extremely high expectations in this area compared to the private sector.

Of these issues, perceived Hindrance Factors was outlined as the area which could have the most impact if improvements were made. Hindrance Factors/Stressors can be things, such as poor equipment or uniform, or day to day issues that make performing in the role more difficult for staff, such as perceived bureaucratic processes. When these things accumulate they can add to an overall perception of the job being made unnecessarily difficult. As a for instance, Durham Constabulary were able to reduce hindrance stressors after new pens were procured, which staff complained did not work in the rain and caused them issues whilst on patrol. By simply reverting to their old supplier they were able to demonstrate listening and reduce the sense of frustration felt by staff.

As a result of the findings, Organisational Development held a focus group with each Directorate across October and November 2017. This produced expanded detail on the Staff Survey findings with staff being asked to give specific thought to examples and things in their everyday work environment that triggered their response to the survey. This allowed Organisational Development to take a deeper dive into the issues highlighted by the survey. The focus groups were documented and the groups were made up of police officers and civilian staff at all ranks and grades. The focus groups highlighted an additional area which frustrates staff, this is:

- **Autonomy** – This is a perception at the time of the survey that staff lack the ability to make decisions themselves and are micro-managed, or unable to break down organisational barriers and bureaucracy to effective decision making.

2.) Proposals

Strategic Development and Organisational Development have worked jointly to devise an Action Plan to address the findings of the Staff Survey and formulate an effective response. This has led to a plan based on two main themes:

- i) An effective way for staff to communicate their ideas, concerns or thoughts in a forum where they can receive answers to their questions and see action taken.
- ii) A set of commitments based on the Focus Group feedback aiming to address issues raised by staff.

2.1) Staff Communication – Talkback

In the original response to the Staff Survey, “Talkback” was launched. This was an online forum where staff could communicate with each other, post questions and receive answers on issues that affected them. This launched in May 2018 after being developed and built from scratch. There is a main page banner on the Force Intranet home page for staff to select this and post on the site, with the site being simple and straightforward to use. Staff could post on the site based upon the main themes identified in the Staff Survey, with the ability to also post under “and another thing” for any other issues. At launch, there was significant activity, but it quickly became apparent that without co-ordination and moderation, the Talkback idea was not providing the responses that staff were expecting. As a result, activity on the Talkback page has decreased significantly. Talkback had originally been planned as a forum style communication tool, but it was clear that staff were mainly posting questions on there with the expectation of receiving an answer. However, when these answers were not always forthcoming, staff were quick to disengage.

In response to this, it is clear that Talkback needs to be proactively managed, with the posted questions acknowledged, and answers sought on staff’s behalf. It was also clear that some staff were uncomfortable with the fact that Talkback has to be posted from a named account, with no ability for posts to be anonymous. Whilst it is desirable for staff to feel confident to raise issues without feeling the need for anonymity, it is also important to allow for anonymous posts so that individuals are not put off.

Looking at successful approaches to this issue used by other Forces, an effective system has been identified which utilises an Advocacy system. This involves the Force advertising for individuals who are passionate and proactive about improving the way the Force engages, and once identified, to form a cohort of “Talkback Advocates.” The idea is to have Advocates across the organisation in as many departments as possible. They can provide visible peer support to staff across the organisation, and also post questions or thoughts on Talkback, on behalf of colleagues who do not want to be identified. The Advocates can be proactive in seeking opinions and putting them on Talkback. They can also monitor posts and seek answers on behalf of individuals posting. This will aim to address the issues which emerged with the original Talkback, and it can be relaunched once the Advocates are in place to raise awareness with appropriate messaging from Corporate Communications.

Utilising Chief Officer Team support, there will be a recruitment campaign for Advocates published, with a view to build the cohort by the end of 2018. They can then be briefed by cascade and provided with information and tools to assist them in the role. This initiative is wholly supported by the Chief Officer Team, and that Advocates will be given relevant support as is reasonable when seeking answers or information on behalf of people posting on Talkback.

Talkback will then be relaunched in early January 2019, with the idea of a “New Year, New Start” style communications campaign produced by Corporate Communications. They will work with the Assistant Commissioner to produce appropriate communications to raise awareness of this.

Talkback will have a “wall” where staff can post their issues and receive responses. Also, it will have a rotating theme section, where the organisation can pose questions on topical themes (eg Talent Development) with a view to promoting discussion and seeking staff opinions on these topics. Individual departments will be able to have a question placed on the rotating theme if they are seeking staff opinions on initiatives or ideas.

2.2) Focus Group Feedback – 8 Key Issues

As a result of the Focus Groups, Strategic Development and Organisational Development have now worked to assess the feedback, and have identified 8 Key Issues which come up most frequently. These are:

- **Career and talent development opportunities and pathways** – staff feel the pathways to develop careers or talent are not always clear.
- **Informal recognition** – Recognition is good for very high level achievements such as acts of bravery or positive outcomes from protracted investigations, but a better process for day to day good work is lacking. This often tends to be brief e-mails from the Chair of Daily Management Meeting and lacks a personal touch from individual Directorate senior leaders. As an example, one officer mentioned how the MPS use “Quality Service Reports” (QSR) as a more formal type of recognition which would be in between a simple thank you and a high level commendation. The QSR could then be added to staff HR records for more noteworthy good work.
- **Senior Leadership Team (SLT) Visibility** – There is a perception that leaders across the organisation are not visible enough. This is noted in both officer and staff feedback. For instance, popping in for team meetings, attending musters etc. There is a feeling that this does not happen enough and is mentioned from Chief Officer Team level down to local SLT level.
- **Projects and Initiatives** – There is a perception that the same individuals/ group of people are always selected for projects/ initiatives with no process as to how they are allocated. This means that individuals feel they are not being given equitable access to specific opportunities.
- **Inconsistency of management/leadership style** – Staff stated that many managers have divergent approaches to management processes meaning it is difficult to work consistently.
- **Team Engagement** – Staff feel that their line managers do not make enough time for team meetings in a more informal setting, for instance, “coffees in the canteen” style meetings. These would be unstructured, informal meetings of teams to allow conversation to flow and bonds to form. This represents more of a challenge for front line responders and will require careful consideration.
- **Wellbeing** – Staff felt that the Force Wellbeing Programme could be better supported at an organisational level, with too much reliance on hard working volunteers and the Wellbeing Network.
- **Autonomy** – There is a perception of too much micro management, and too many bureaucratic hurdles (especially in regard to procurement). These issues could be alleviated by giving staff more autonomy to make decisions.

With many of these themes, there are already plans underway to address them. For instance, the Talent Development Working Group has been formed and has been holding events around Talent Development and Continuing Professional Development. The Management Development Programme has been launched and is set to provide support to achieve more consistent and effective management support. The Force is working to assess if communication of these initiatives could be improved to allow staff to better understand what is being done.

The plan to address this is for each of the 8 Key Themes to be given an owner. That owner will be responsible for populating an Action Plan to turn the Key Issue into a Commitment. Each Issue, Owner and associated Action Plan will be published on the Organisational Development Portal of the Force Intranet, this will be a clickable link which will allow staff to see the status of each plan, and the most recent actions taken, with the owner of the plan updating what has been done.

Again, Corporate Communications will assist with this and ensure the Commitments are publicised with a news article on the main page to raise awareness. This will help demonstrate to staff that relevant action is being taken as a result of the outcomes of the Staff Survey and follow up Focus Groups; that staff have been listened to and their concerns acted upon.

3.) Chief Officer Lead and Communications

Assistant Commissioner (AC) Alistair Sutherland has taken ownership as the Chief Officer Team Lead for the Staff Survey response. Corporate Communications will work with the AC to populate an appropriate communications plan.

The intention is to produce a news article communications piece where the AC can talk about his support for the Talkback Advocates, and encourage people to sign up. The AC will also be able to task Directorate Heads with cascading the message and identifying suitable people who may wish to be involved within their respective Directorates.

The AC can also talk about the 8 Key Commitments the Force is aiming to address as a result of the Staff Survey Feedback and the actions that will be taken around this to show that this is being supported by the Chief Officer Team. Durham University's research has shown that Chief Officer buy in is critical to ensure staff support and trust in actions taken.

4.) Timescales

Corporate Communications are now drafting communications pieces and working on the Talkback website to update it to the new design. The aim is to advertise through the Force intranet and Directorate Heads to identify Talkback Advocates throughout December 2018, and ensure that they are prepared and briefed by the end of December.

During this time, owners will also be identified for each of the 8 Key Commitments to populate Action Plans, and the Organisational Development website will be prepared to be able to publish these plans accompanied by a main page news story.

As previously mentioned, the aim will then be to launch the new and improved Talkback, along with the 8 Key Commitments at the start of January 2019 with a “New Year, New Start” style feel to the campaign.

Timeline summary:

- News article outlining commitments and plans - End of November 18
- Recruitment of Talkback Advocates - During December 18
- Identify Action Plan owners and populate plans - During December 18
- Launch of Talkback and Publish 8 Commitments - Early January 19

5.) Monitoring

It is proposed that the Assistant Commissioner will monitor the progress of Talkback and the 8 Commitments as a quarterly agenda item at the Organisational Learning Forum.

This will hold Action Plan owners to account and ensure active progress against the commitments.

6.) Conclusion

This “two-pronged” approach aims to demonstrate a clear plan to staff on issues raised in the last Staff Survey. Whilst the Force had excellent engagement rate, and overall very good scores there are always ways in which we can improve. The 8 Key Commitments aim to address this.

Also, through Talkback Advocates there will now be a peer support network to enable staff to regularly communicate issues on an ongoing basis, with a clear way for these to be picked up, addressed and, where possible answers provided or change made to address issues.

As aforementioned, this is set to launch in January 2019 with a view to being able to demonstrate real progress before the next survey launches in order to build confidence that taking part in the survey leads to real results.

It is noted that there have been delays in this process, and we aim to openly acknowledge this on communications material to show staff the organisation is committed to making improvements and to address the issues raised.

These plans have been approved in principle by the AC and an accompanying Action Plan has been produced with owners for each action being currently sought.

Restricted Appendix

- Appendix A – Original Staff Survey Report

Luke Baldock

T/Chief Inspector

Strategic Development

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Committee(s): Professional Standards and Integrity Sub Committee	Date: 7 th December 2018
Subject: Integrity Dashboard and Code of Ethics Update	Public
Report of: Commissioner of the City of London Police	For Information
Report author: Stuart Phoenix, Head of Strategic Development	

Summary

Integrity Standards Board and Dashboard:

The dashboard appended to this report (Appendix A) was considered by the Force's Integrity Standards Board (ISB) on 22nd November 2018, this board was also attended by HMICFRS as part of their programme of Force insight visits which are used to inform the Integrated PEEL Inspection which the Force will receive week commencing 3rd December. It was highlighted at this meeting that the number of cases for each indicator remained at low levels. This was consistent with previous years.

It was highlighted that both PSD and HR had not identified any integrity issues from the existing cases to raise for ISB to note. The indicators were discussed by the group and there were no issues identified with the data presented.

ISB were provided with an update on the work being undertaken to develop an revised Integrity Dashboard containing a wider suite of indicators from across the Force. Strategic Development are working closely with PSD to provide indicators to give greater context on integrity so that the ISB can review the indicators from a number of areas and assess integrity verses volume and other outcomes. At this stage the indicators require workshopping with owners to identify data sources and the context to be provided and Strategic Development undertook to provide ISB with the working dashboard for oversight at the next scheduled ISB meeting which will take place early 2019.

Code of Ethics Update:

Two meetings of the London Police Challenge Forum (LPCF) have taken place since your last Sub Committee; one on the 30th October 2018 hosted by the British Transport Police (BTP) in Camden and one on 1st November 2018 hosted by the Metropolitan Police Service (MPS) at Charing Cross. Draft notes have been produced, however, they have not yet been through MPS internal screening processes and are not yet in the public domain. The next LPCF event will be on the 13th December at New Scotland Yard and will include a number of chief officer inputs (including the national lead for Integrity, the Chief Constable of Gwent). City of London Police chief officers have agreed to provide videos of chief officers talking about difficult decisions they have faced and how they approached them.

The National Counter Terrorism HQ has now joined the LPCF as a fourth member.

The Force's intranet pages dedicated to the LPCF and how to become an Ethics Associate have been refreshed. The first tranche of 'guidance notes' on ethical dilemmas discussed has now been published on the intranet.

The Head of Strategic Development (HoSD) attended the most recent regional meeting of the Police Ethics Network (PEN) on 11th October 2018 hosted by Bath Spa University, followed by the first national meeting of the UK Police Ethics Guidance Group on the 12th October, chaired by Chief Constable Julian Williams. Representatives from the Home Office, Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services (HMICFRS), the Police Federation and the College of Policing attended.

The Integrity Standards Development Plan is also included for information. There is one action currently shown as RED relating to a proposal to set up an internal board, for which there is not universal agreement. No consensus has been reached during the previous quarter therefore direction is being sought from ISB as to whether the action should be closed or a formal proposal made to the Force's Strategic Management Board for determination. The Development Plan is now being reviewed so that a revised plan can be presented to the next ISB and Professional Standards and Integrity Sub Committee.

Recommendation(s)

Members are asked to note the report.

Main Report

Background

1. Integrity is a key principle of the Police Code of Ethics, published in July 2014. Recognising this, the Force developed an integrity dashboard that brought together a series of indicators across a broad range of activities associated with integrity. The dashboard indicates the extent to which the Force's workforce acts with integrity. It is attached for Members' information at Appendix A.
2. To complement the dashboard and ensure there is a programme of ongoing activities to embed the Police Code of Ethics, the Force developed an Integrity Development plan, which is attached for Members' information at Appendix B.

Current Position

Integrity Standards Board and Dashboard

3. An Integrity Standards Board (ISB) was constituted to monitor the dashboard on a quarterly basis and to consider other issues relating to integrity. The Board is chaired by the Assistant Commissioner and is attended by the Chairman of your Sub Committee and a representative from the Town Clerk's department. The most recent board was held on 22nd November 2018.

4. At that meeting it was highlighted that the number of cases for each indicator remained at historic low levels and that upon submission of the dashboard data neither HR or PSD had identified any Integrity issues from the cases being investigated. The group were invited to discuss the dashboard in more detail and a number of indicators were reviewed.
5. Indicator 6: Number of monitoring exercises around irregular use/transitions involving Corporate credit cards. This reported as 2 investigations for the quarter and like with a number of other indicators the group felt that there could be further context provided here through listing the number of overall transactions to put the number of investigations into a wider context with card use. This was something that was accepted as required for the Dashboard refresh which is currently being progressed.
6. Indicator 7 was also discussed about the use of Force and complaints resulting from its use. There had been no complaints listed for this indicator for the period and ISB discussed the wording of the indicator for future reference. It was defined that there was no one definition for use of Force in complaints with several categories being used nationally to pick up a number of police activities. This indicator would be reviewed in the new Dashboard to pick this up so it would better reflect the data collected by PSD.
7. Indicator 16, this listed the number of results for testing with cause drug testing which was 0 for the quarter. It was highlighted that the random testing figures were not included within this indicator but were being reviewed for inclusion in the new Dashboard format to show wider context of testing with the quarterly programme run by Learning and Development.
8. ISB were provided with an update on the work being undertaken to develop the Integrity Dashboard so that a wider suite of indicators could be included for future review. It was confirmed that a draft had been produced with Strategic Development working in tandem with PSD to identify a number of areas for potential inclusion within the draft. Indicators now needed to be workshopped with owners so that clear context could be provided for reference at future ISB meetings. It was agreed that a working draft would be presented for oversight at the next ISB.

Code of Ethics Update

9. The last two scheduled meetings of the London Police Challenge Forum (LPCF) took place on the 30th October hosted by British Transport Police (BTP) at Camden, and the 1st November 2018 hosted by the MPS at Charing Cross. The ethical issues covered at each meeting were the same and included use of spit guards, Freemasonry and the police and drug taking at music festivals. All of the dilemmas have been considered by previous panels, therefore this was seen as a validation exercise of previous findings.
10. The result of previous panels are now being published, the first tranche were published on the Force's intranet on the 29th October 2018 and will be added

to as the documents become available. There is still no national mechanism for sharing these outside of individual police forces, with each force currently having to publish them on their own websites. A solution for this remains on the national agenda.

11. The next LPCF event takes place on 13th December 2018 at New Scotland Yard. It is being used as an opportunity to take stock of what has been achieved and develop more direct input from senior officers. DAC Martin (MPS) is scheduled to open the event. CoLP will be formally represented by the Commander Ops and Head of Strategic Planning, although there are a number of places available for City Ethics Associates to also attend. A session has been reserved for CoLP to showcase a number of videos of chief officers talking about difficult decisions they have faced during their careers, the options available to them and what they ended up doing. The Chief Constable of Gwent will lead a session on a proposed Appropriate Relationships at Work Policy, whilst another session will be led by a former Director of a high profile construction company focusing on decision making in that organisation prior to its collapse. The event will be closed by ACC Adrian Hanstock (BTP).
12. CoLP has refreshed its LPCF and Ethics Associates intranet pages, with improved details of how individuals can apply to become Ethics Associates or submit an ethical dilemma. With the exception of details about respective force contacts, the wording used is consistent across the 4 LPCF forces, which now includes the National Counter Terrorism HQ.

Regional Police Ethics Network and UK Police Ethics Guidance Group

13. The Head of Strategic Development attended the most recent meeting of the Regional Police Ethics Network (RPEN) hosted by Bath Spa University on 11th October 2018. The morning session followed the usual format of each organisation providing an update of their most recent activities. The 4 LPCF organisations meet quarterly with representatives from 22 other Policing and Non-Policing organisations in that geographic region and the RPEN has been instrumental in assisting with the establishment of the 3 other regions across the UK. Two items were discussed which were of particular interest to the Force:
 - a. Taking part in a long term survey that is designed to measure ethical drift (basically a set of questions will be asked of the same person as they apply to join a police force, following their probation and then after 3 to 5 years' service); and
 - b. The use of weighted filter questions designed to explore an individual's ethical stance on a number of issues, at the recruitment stage. Devon and Cornwall reported that they asked these questions of individuals following their initial application being successful. The result was that they did not proceed with 1 in 4 applicants based on their responses to the questions asked. They view this as a long term investment in filtering out undesirable candidates.

Both of the above areas will be explored further and will feature in Force's Integrity Standards Development Plan, which is being reviewed and will be submitted to the next ISB for consideration.

14. The afternoon session of the RPEN was the Region's Annual Conference, with guest speakers discussing ethics in an operational environment. Presentations were given by a Superintendent, a Royal Marines Colonel, a Deputy Chief Constable and a retired Commander for the MPS. This was complemented by a short presentation from a University Professor regarding a new ethical theory being developed.
15. The first full United Kingdom level Police Ethics Committee was held the following day (Friday 12th), also at Bath Spa University. The United Kingdom Police Ethics Guidance Group (UKPEGG) is co-chaired by NPCC Lead for the Police Code of Ethics - Chief Constable Julian Williams (Gwent Police) and Professor Allyson MacVean of Bath Spa University. Numerous UK level organisations were represented at this meeting, including the Home Office, HMICFRS, the Police Federation, Superintendents' Association and the College of Policing.

Integrity Standards Development Plan

16. The Integrity Standards Development Plan remains in two sections covering 'commitment' actions and 'development' actions. The commitment section is intended to ensure that the Force maintains the basic structures to support integrity in the workplace. As these were implemented last year, whilst they are being maintained they will be reflected as 'GREEN'.
17. Of the five new areas contained within the plan, one remains RED, as detailed below.
 - i. Launch an internal board to advise on and review key decisions and processes. This is to support a finding of the Staff Survey around perceived organisational unfairness relating to strategic decisions. Discussions around implementing this proposal have been led by the Chief Superintendent of Intelligence and Information Directorate. The proposal has not been universally supported, with some asserting current mechanisms in place (e.g. prompts on strategic board templates to consider Code of Ethics implications on proposals or decisions requested) are sufficient, and there are other avenues where individuals can challenge decisions. It could also be viewed as increasing bureaucracy given the existing mechanisms, which includes the LPCF in place. Given there is now an action plan to address issues highlighted by the Staff Survey, ISB members are asked to consider whether this action should be closed with no further action, or request a paper to be submitted to SMB for determination.
18. Direction on the above issue was sought at ISB and it was determined that the culture audit being undertaken by Organisational Development would be expanded to cover ethics to inform the future direction of this indicator. This

would then establish if a separate board was required or if the existing arrangements were sufficient as well as exploring the potential to place Ethics oversight on the agenda of an existing meeting such as the Force organisation Development Forum.

Crime audits

19. The Force Crime and Incident Registrar (FCIR) conducts regular audits of Force compliance with Home Office Counting Rules (HOCR) and the National Crime and Incident Recording Standard (NCRS). Forces (note, not the City of London Police) have been criticised in the past for unethical crime recording and associated practices. Whilst the audits are primarily concerned with compliance, the FCIR also looks to see where results indicate unethical practices or circumstances that might be interpreted as unethical.
20. The audit reports are submitted to the Victim Code and Crime Working Group for oversight and action. The FCIR reports verbally to the Integrity Standards Board whether any of the audits reveal ethical or integrity-related issues. If such issues are identified, a written report is made.

Appendices

- Appendix A – Integrity Dashboard (considered by the Integrity Standards Board 22nd November 2018)
- Appendix B – Integrity Standards Development Plan (considered by the Integrity Standards Board 22nd November 2018)

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CITY OF LONDON POLICE

**INTEGRITY
DASHBOARD 2018/19
Quarter 2
Version 1.0**



NOT PROTECTIVELY MARKED - MANAGEMENT

FORCE INTEGRITY INDICATORS										
Number	Indicator	Historic Levels				Current Levels 2018/19				
		2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
1	Number of Grievances registered with HR	7	7	13	8	2	2	-	-	4
	Two new grievances submitted in Quarter 2. No integrity issues have been identified for reporting to ISB through the HR return to Strategic Development.									
2	Number of Employment Tribunals that cite the Force	2	0	2	2	0	1	-	-	1
	One ET has been submitted in Quarter 2. No integrity issues have been identified for reporting to ISB through the HR return to Strategic Development.									
3	Number of registered complaints against Force excluding Action Fraud	117	105	102	90	11	12	-	-	23
	<p>This is the number of complaints formally recorded under the Police Reform Act 2002, about the conduct of police officers and staff. The outcome of any recorded complaint following finalisation of the complaint is reported to the Professional Standards and Integrity Sub Committee on a quarterly basis, although the above figure does not reflect the number of cases finalised as they will fall into different periods depending on the length of the investigation. Additionally, any learning identified is reported through OLF.</p> <p>The number of complaints remains at a steady level from that reported in quarter 1. Complaints involve one or more allegations against officers, the broad range of allegations are reported to our Professional Standards Sub-Committee who receive an update on how the investigations are progressing. Integrity issues found as a result of these investigations will be raised at future ISBs and OLF for action.</p>									
4	Number of Civil cases which site the Force	24	23	17	18	7	4	-	-	11
	This is the number of civil claims recorded for consideration by our insurers under professional indemnity or public liability. They may be recorded when there is the 'threat' of civil litigation, pre-action, or when the particulars of claim are received. A number of 'threat of' and pre-action matters are not necessarily progressed but may recorded and be kept open until limitation has been exceeded or confirmation that no claim will be made. A number of claims may be in parallel with or follow a complaint.									
5	Investigations resulting from monitoring of irregular mobile phone use	0	0	1	0	0	0	-	-	0
	<p>PSD assesses intelligence in respect of inappropriate usage and otherwise does not investigate use of mobile phones, telephone, and or iPad or other devices unless it is part of another investigation where inappropriate usage forms a strand of that investigation. The number is that that have been investigated.</p> <p>For the second quarter there are no investigations to report in this area.</p>									

NOT PROTECTIVELY MARKED - MANAGEMENT

FORCE INTEGRITY INDICATORS										
Number	Indicator	Historic Levels				Current Levels 2018/19				
		2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
6	Number of monitoring exercises around irregular use/transitions involving Corporate credit cards	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		1	5	19	1	1	2	-	-	3
<p>PSD only assess intelligence received on the use of Corporate Cards. PSD does not otherwise investigate the use of Corporate Cards unless it is a recorded conduct investigation where inappropriate usage is, or forms a strand of, that investigation. The number provided is that that have been investigated. The outcome of any conduct investigation is reported to the Professional Standards and Integrity Sub Committee on a quarterly basis, although the above figure does not reflect the number of investigations completed as they will fall into different periods depending on the length of the investigation. Additionally, any learning identified is reported through OLF.</p> <p>PSD have not identified any Integrity issues with these investigations for inclusion within this analysis and reporting to ISB in their return to Strategic Development.</p>										
7	Number of PSD investigations principally arising from complaints on use of Force	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		1	2	6	0	0	0	-	-	0
<p>Use of Force Forms now being recorded via Pronto - They are not being used for the purposes of integrity monitoring by CCU.</p> <p>For the second quarter there are no investigations to report in this area.</p>										
8	Number of monitoring assessments undertaken around expenses claims	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		1	2	1	3	0	0	-	-	0
<p>PSD only assesses intelligence received on expense matters. Otherwise, PSD does not investigate expense claims unless it is, or forms part of, another recorded conduct investigation where inappropriate claims forms a strand of that investigation. The number is the number of investigations conducted.</p> <p>For the second quarter there are no monitoring assessments to report in this area.</p>										
9	Number of business Interest Investigations undertaken for police officers	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		3	1	6	0	0	0	-	-	0
<p>PSD risk assesses all new Business Interests and reviews annual renewals. Otherwise, PSD does not proactively assess or investigate business interest unless it is part of another investigation or vetting matter where the appropriateness of a business interest forms a strand of that investigation. The number provided is that that are investigated.</p> <p>For the second quarter there are no investigations to report in this area.</p>										

NOT PROTECTIVELY MARKED - MANAGEMENT

NOT PROTECTIVELY MARKED - MANAGEMENT

FORCE INTEGRITY INDICATORS										
Number	Indicator	Historic Levels				Current Levels 2018/19				
		2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
10	Number of business Interest Investigations undertaken for support staff	0	0	0	1	1	0	-	-	1
		<p>PSD risk assesses all new Business Interests and reviews annual renewals. Otherwise, PSD does not proactively assess or investigate business interest unless it is part of another investigation or vetting matter where the appropriateness of a business interest forms a strand of that investigation. The number provided is that that have been investigated. The outcome of any conduct investigation is reported to the Professional Standards and Integrity Sub Committee on a quarterly basis, although the above figure does not reflect the number of investigations completed as they will fall into different periods depending on the length of the investigation. Any learning identified is reported through OLF.</p> <p>For the second quarter there are no investigations to report in this area.</p>								
11	Number of unregistered CoLP media contacts detected by Corp Comms and reported to PSD	2	0	5	1	0	0	-	-	0
		<p>PSD only assess media contacts where intelligence is received and only investigates where it is, or part of, a recorded conduct investigation where inappropriate contact is, or forms, a strand of that investigation. The number represents the number of investigations conducted.</p> <p>Corporate Comms have not identified any unregistered contacts within this period to report.</p>								
12	Number of investigations undertaken by PSD as a result of PNC/PND dip sampling	1	2	0	0	0	0	-	-	0
		<p>Unless referred to it by IMS PSD does not assess breaches of PNC/PND security, unless it has come to PSD's attention as a conduct matter in breach of the professional behaviour of confidentiality, and/or criminal misuse of computer systems, or has been referred from IMS, or it is part of a conduct investigation where inappropriate usage forms a strand of that investigation. The number represents the number of investigations.</p> <p>There has been no intelligence submitted to PSD that has resulted in any investigations in this area.</p>								
13	Number of monitoring exercises conducted on gifts and hospitality register entries	5	3	8	3	2	0	-	-	2
		<p>Gift and Hospitality is only assessed if intelligence is received about a specific recording or non-recording of a gift or hospitality. PSD does not otherwise investigate gift or hospitality matters unless it is a recordable conduct matter, where the giving or receiving of gifts and hospitality is, or forms a strand of, that investigation. The number represents the number of investigations where gifts and hospitality were a factor. The outcome of any conduct investigation is reported to the Professional Standards and Integrity Sub Committee on a quarterly basis, although the above figure does not reflect the number of investigations completed as they will fall into different periods depending on the length of the investigation. Any learning identified is reported through OLF.</p>								

NOT PROTECTIVELY MARKED - MANAGEMENT

FORCE INTEGRITY INDICATORS										
Number	Indicator	Historic Levels				Current Levels 2018/19				
		2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
14	Number of management issues arising from re-vetting of the workforce			0	0	0	0	-	-	0
	<p>These are refusals that are considered in response to adverse information or intelligence during re-vetting on renewal or when upgrading of vetting for a specific role. The number represents the number of refusals.</p> <p>There are no integrity issues to report in this area for the second quarter.</p>									
15	Number of procurement purchases assessed by PSD for investigation	0	0	2	3	0	1	-	-	1
	<p>PSD only assesses intelligence in respect of procurement matters, and otherwise does not investigate procurement unless it is either a complaint/conduct matter, or forms a strand of a complaint/conduct matter. The number represent the number of such matters investigated.</p> <p>PSD have not identified any Integrity issues for inclusion within this analysis from their investigation carried out in this quarter in their return to Strategic Development.</p>									
16*	Number of positive results from testing with cause random drug testing			0	0	0	0	-	-	0
	<p>No drug tests with cause undertaken in Quarter 2.</p>									
17	Identified breaches of the Donations and sponsorship SOP				-	0	0	-	-	0
	<p>There have been no identified breaches of the SOP within this period as reported by Finance to Strategic Development to inform the Dashboard for this reporting period.</p>									

*Note: ISB discussed that a measure around the current programme of role related drug testing could be included to inform any integrity issues that may be found in this area. This is a measure proposed for the new Dashboard and as such role related drug testing is not included within this measure.

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**POLICE INTEGRITY DEVELOPMENT
and DELIVERY PLAN REPORT 2018-19
November 2018 update**



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INTRODUCTION

This development and delivery plan has been produced to ensure that the City of London Police continues to discharge its obligations introduced by the ACPO Police Integrity Maturity Model, supports the continued embedding of the national Police Code of Ethics and implements improvements to ethics and integrity in the Force in line with national requirements and best practice.

PLAN SUMMARY

1. Commit Measures	Traffic Light Tracker		
	May 18	Aug 18	Nov 18
1.1 Force has issued a statement committing to support and embed the Police Code of Ethics	GREEN	GREEN	GREEN
1.2 Maintain the Force Integrity Delivery Plan	GREEN	GREEN	GREEN
1.3 Maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force	GREEN	GREEN	GREEN
1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas	GREEN	GREEN	GREEN
1.5 Define the Force approach to corruption within appropriate Standard Operating Procedures and supporting statements	GREEN	GREEN	GREEN
1.6 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes	GREEN	GREEN	GREEN
1.7 Maintain a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates)	GREEN	GREEN	GREEN
1.8 Maintain a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan	GREEN	GREEN	GREEN
1.9 Ensure training on standards, values and leadership ethics is available for all staff	GREEN	GREEN	GREEN
1.10 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures	GREEN	GREEN	GREEN

2. Development Measures	Traffic Light Tracker		
	May 18	Aug 18	Nov 18
2.1 Link in and participate in Regional and National boards concerned with the Code of Ethics	GREEN	GREEN	GREEN
2.2 Launch an internal board to advise on and review key decisions and processes	WHITE	RED	RED
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	WHITE	WHITE	AMBER
2.4 To review staff survey and incorporate any relevant recommendations in this development action plan	GREEN	COMPLETE	COMPLETE
2.5 To include a question about public perception of integrity in the annual community survey	WHITE	WHITE	WHITE
2.6 Explore opportunities to include integrity/ethics more explicitly in recruitment processes	WHITE	RED	GREEN

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PERFORMANCE REPORT

Traffic Light Colour	Definition of measure achievement
GREEN	Aim is achieved in date and to level set.
AMBER	Current projections indicate this measure will not be met unless this additional action taken
RED	No progress on measure or deadline/level has not been met and it is unlikely will be met.
WHITE	Due date not reached

Target Report Checklist

- Current level of achievement
- Dates for work completed
- Dates future work will be completed by (milestones)
- Reasons for current achievement level
- Any risks that have been realised
- Work undertaken to manage realised risk
- Work to be undertaken to manage risk against target
- Impact of other indicators on this work area
- A statement from owner about whether they think the measure will or will not be achieved by the due date based on the information provided above.

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1. COMMITMENT CRITERIA	
MEASURE	1.1. Force has issued a statement committing to support and embed the Police Code of Ethics
OWNER	Head of Strategic Development
AIM/RATIONALE	The Commissioner will make a statement committing the Force to supporting and embedding the Police Code of Ethics and set out the framework for the management of integrity within the organisation
DUE DATE	March 2018
MEASUREMENT	Record date and document statement is issued within and to be reviewed annually
TRAFFIC LIGHT CRITERIA	Green: Statement Issued. Amber: Statement being drafted. Red: Statement not issued or out of date by more than three months
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>The Force’s commitment to the Police Code of Ethics is included prominently in all Force strategic level publications (Corporate Plan 2018-2023, Policing Plan 2017-2020, Force-level strategies and Policies).</p> <p>For the Policing Plan, this has been developed to link the Code’s principles more explicitly to the Force values of Integrity, Fairness and Professionalism. It also includes reference to the internal processes to manage integrity within the organisation, i.e. the work of the Integrity Standards Board and scrutiny function of the Police Professional Standards and Integrity Sub Committee.</p> <p>A statement has also been included in the Force Annual Report.</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.2 To maintain the Force Integrity Delivery Plan
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure work relating to integrity, including the continued embedding of the Police Code of Ethics, progresses and is reported routinely to the Integrity Standards Board and Police Professional Standards and Integrity Sub Committee.
MEASUREMENT	Existence of a plan which is reported to ISB quarterly
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Plan exists Amber: Plan being drafted. Red: Plan not issued or out of date by more than three months
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>This plan has been in existence since 14th November 2016 and is being reported to each Integrity Standards Board and Professional Standards and Integrity Sub Committee.</p> <p>It has been reviewed to include new development measures for 2018.</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.3 To maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force
OWNER	Head of Strategic Development
AIM/RATIONALE	To monitor activities relating to workforce and organisational integrity and drive activity with regard to integrity and transparency.
MEASUREMENT	Group exists, meets regularly and provides reports to the Professional Standards and Integrity Sub Committee
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Group exists and meets regularly. Amber: Group exists but has not met for over 3 months. Red: Group doesn't exist or has not met for 6 months
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>The Integrity Standards Board is now established; it is chaired by the Assistant Commissioner, attended by all directorates and representatives from the Town Clerk's Department and Police Committee. The meetings are quarterly and minuted.</p> <p>The last meeting was 27th September 2018.</p> <p>The next meeting is on 22nd November 2018.</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.4 To maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas
OWNER	Directorate Heads (Head of Strategic Development to coordinate)
AIM/RATIONALE	To ensure Directorates are fully linked into integrity monitoring and activities that support the continued development of integrity within the Force.
MEASUREMENT	Directorate SPOCs exist and attend Integrity Standards Board (ISB).
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Directorate representation exists and attends ISB Amber: Directorate SPOCs exist but Directorates have not been represented at 1 ISB Red: Directorate representation does not exist or directorates have not been represented at 2 or more consecutive meetings.
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>Directorate SPOCs exist for all directorates and are written into ISBs terms of reference. If the SPOC cannot attend ISB, they are required to arrange suitable representation at an appropriate level. All have SPOCs.</p> <p>At November 2018 the Directorate SPOCs are as follows:</p> <p>Crime – D Service</p> <p>I&I – H McKoy</p> <p>Uniform Policing – E Michaels</p> <p>Economic Crime – G Whittick</p> <p>BSD – P Adams</p> <p>.</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.5 To have defined the Force approach to corruption within appropriate Standard Operating Procedures (SOPs) and supporting statements
OWNER	Head of Professional Standards
AIM/RATIONALE	To ensure the Force approach to corruption is clearly documented and communicated to all staff and the public, supporting a culture of confidence within the Force in reporting suspected corruption and challenging behaviour and transparency
MEASUREMENT	Relevant SOPs (investigation and sanctions) detail Force approach to corruption and Commissioner has issued a statement as part of the Force's commitment to the ACPO (Association Of Chief Police Officers, now the National Police Chiefs Council) Police Integrity Model detailing the zero tolerance approach
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Position articulated and published. Amber: Process in development Red: No process or past the due by date by 3 months or more
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>The Force has a robust approach to counter corruption. This message has been communicated through a variety of methods, including intranet articles and workshops. There is a current anti-corruption SOP and Control Strategy. Safecall provides a secure and anonymous reporting system where the workforce can report any concerns, which has been reinforced by intranet articles.</p> <p>PSD is specifically feeding into the strategic processes to identify (and thereafter manage) threat, risk and harm, and includes counter corruption amongst other PSD-related issues.</p> <p>A quarterly Professionalism newsletter has been and launched and includes articles around raising awareness of corruption as well as promoting positive, acceptable behaviours.</p> <p>The Force is continuing to work towards formalising collaboration opportunities with the British Transport Police relating to counter corruption (November 2018).</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.6 To have established a process for internally and externally communicating corruption /integrity/ misconduct outcomes
OWNER	Director of Professional Standards
AIM/RATIONALE	To support the transparency, facilitate organisational learning and provide confidence that the force is openly addressing issues relating to corruption, integrity and misconduct. .
MEASUREMENT	Process established and maintained
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Process established and being used. Amber: Process established but not being consistently used Red: No process or process routinely not used
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>There is a process in place to publish the outcomes of hearings internally in sufficient detail to identify organisational learning, The results of misconduct hearings that are held in public are also published on the public website (last published results 25-28th September 2018) (checked November 2018)</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.7 To have established a process to support the Force's participation in the London Panel Challenge Forum (LPCF) (Ethics Associates)
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure the Force is fully engaged in the regional tri-force ethics challenge panel, promoting organisational learning and providing support to officers and staff in ethical decision making.
MEASUREMENT	Process in place and being used.
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Process in place and being used. Amber; Process in development. Red: Process in place but not being used or no process in existence past due date
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>The formal launch of the London Panel Challenge Forum took place on 15th December 2016.</p> <ol style="list-style-type: none"> 1. The Force has participated in every panel held since it began in Decemner 2016, including hosting a number of the meetings. 2. The next meeting is being combined with a wider event that takes place on 13th December 2018 @ New Scotland Yard. Commander Ops and Head of Strategic Development will attend for City of London Police. 	

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1. COMMITMENT CRITERIA	
MEASURE	1.8 To have appointed a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure chief officer ownership and oversight of ethical and integrity issues within Force
MEASUREMENT	Chief officer lead appointed
DUE BY	March 2018
TRAFFIC LIGHT CRITERIA	Green: Chief officer lead appointed and active Amber: Chief Officer lead appointed but not active in role Red: No chief officer lead. .
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>The Assistant Commissioner is the Chief Officer lead for integrity matters in force. In addition to chairing the Integrity Standards Board, they also chair the Organisational Learning Forum, the Crime Data Integrity Oversight Board and lead on the associated area of Professional Standards. They are held to account by the Commissioner, the Grand Committee and the Professional Standards and Integrity Sub Committee.</p> <p>The Commander (Operations) additionally chairs London Police Challenge Forum panels for additional resilience.</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.9 To ensure training on standards, values and leadership ethics is available for all staff
OWNER	Director of Human Resources
AIM/RATIONALE	To ensure staff are supported in their duty to uphold the Force's integrity standards
MEASUREMENT	Our recruitment and promotion processes will contain references to how integrity standards will be used as part of the assessment criteria for recruitment of new officers within the Force and for promotion of existing officers
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Training courses are fully available within a rolling yearly programme. Amber: Training courses are still in development. Red: No training courses are available.
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>Information on standards, values and leadership is available to all staff on the intranet.</p> <p>All courses, Inspectors, Sergeants, Custody, Personal Safety Trainers etc provide advice and guidance on standards and integrity.</p> <p>A major aspect of the Probationer programme is ensuring students uphold the force integrity standards, not only delivered by Learning & Development trainers but also Professional Standards Department.</p> <p>Specials initial courses receive input on standards and integrity.</p> <p>All training courses have been reviewed to ensure they incorporate the national College of Policing Code of Ethics. The Code of Ethics forms a discrete element of induction training, which includes written information and face to face presentations. (Position remains accurate @ November 2018).</p>	

NOT PROTECTIVELY MARKED

1. COMMITMENT CRITERIA	
MEASURE	1.10 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures
OWNER	Directorate Heads (co-ordinated by Head of Strategic Development)
AIM/RATIONALE	To ensure the Force complies with national standards with regard to policies and Standard Operating Procedures
MEASUREMENT	Strategic Development will maintain a watching brief on published APP to ensure all new/revised APP is considered by Policy owners.
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: APP adopted or force position reviewed against APP. Amber: APP introduced and review is required RED: APP not considered
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>When Authorised Professional Practice (APP) was introduced by the College of Policing, the Force committed to adopt the APP in full where that could be done. Where full adoption could not take place (due to City-specific circumstances), Policy owners were required to review force procedures against the APP to ensure there was no conflict and that force processes reflect national best practice. This has been done for all currently published APP and is up to date (as at November 2018).</p> <p>APP relates principally to operational processes and there is currently very limited APP that relates to those areas that most impacts on integrity (e.g. gifts and hospitality, expenses, use of telephones/IT systems, sponsorship etc.). Strategic Development checks the College of Policing APP site monthly to identify any revised or new APP to ensure it is considered by the Force. Any such identified APP will be reported as part of this action plan.</p>	

NOT PROTECTIVELY MARKED

2. Development Measures	
MEASURE	2.1 1 Link in and participate in Regional and National boards concerned with the Code of Ethics
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure that the Force is able to contribute to and benefit from latest developments in ethical policing
MEASUREMENT	Head of Strategic Development to provide ISB with details of activities supporting this measure
DUE BY	QUARTERLY UPDATES to ISB
TRAFFIC LIGHT CRITERIA	Green: Active participation and new initiatives identified Amber: Intermittent participation. Red: No participation
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>Head of Strategic Development (HoSD) is now a member of both the regional and national integrity boards.</p> <p>HoSD attended the regional meeting in Chippenham (Bath Spa University) on 11th October 2018 and the national meeting on the 12th October at the same venue. The regional meeting was chaired by Professor Alyson McVean, the national meeting by the Chief Constable of Gwent Police.</p> <p>A number of initiatives were discussed, including assessing ethical drift during service and ethical filters during recruitment which CoLP will be able to benefit from when and will feature in the reviewed Development Plan for 2019.</p>	

NOT PROTECTIVELY MARKED

2. Development Measures	
MEASURE	2.2 Launch an internal board to advise on and review key decisions and processes
OWNER	Head of Strategic Development/Ch. Supt I&I
AIM/RATIONALE	One of the issues highlighted by the Staff Survey 2017 was a perception of organisational unfairness. This board would promote transparency and help to influence organisational behaviours.
MEASUREMENT	Existence of a board that produces useful information/advice to other boards/managers/policy developers.
DUE BY	July 2018
TRAFFIC LIGHT CRITERIA	Green: Board established and meeting to a schedule; AMBER: Board established but meeting ad hoc; RED: Board not yet established
TRAFFIC LIGHT	RED
CURRENT POSITION	
<p>Ch. Supt I&I attended a national event relating to Staff Surveys where good practice disseminated by Devon & Cornwall Police included a discussion about internal boards that discuss referrals made about corporate/organisational decisions and publish their findings. They have found this has helped to influence the quality of decision making from an ethical perspective.</p> <p>Last year (2017) we included code of ethics considerations into report templates. This board would fulfil two purposes:</p> <ol style="list-style-type: none"> (1) It would indicate the level of success of the action already taken with regard to changes to the template referred to above; and (2) It would support addressing one of the findings of the staff survey re perceived organisational unfairness <p>Discussions have been ongoing (principally led by Ch.Supt I&I) for such a board to be agreed in principle. There are dissenting views around its necessity. Some feel it is duplicating work given that all Force report templates now include prompts around the ethical implications of proposals or decisions. Given that many believe current mechanisms in place are sufficient to ensure adherence and consideration of the Code of Ethics, directopn is being sought from ISB as to whether this action should be closed.</p>	

NOT PROTECTIVELY MARKED

2 Development Measures	
MEASURE	2.3 Conduct an annual review of the Force integrity programme and implement identified improvements
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure the Force continues to develop its approach to integrity and has plans to embed best practice.
MEASUREMENT	Review completed and reported to ISB
DUE BY	October 2018
TRAFFIC LIGHT CRITERIA	Green: Review complete and action plan amended Amber: review complete but action plan unamended or review overdue by 1-3 months Red: Review overdue by 3 months or more with unamended action plan.
TRAFFIC LIGHT	AMBER
CURRENT POSITION	
<p>This plan is now under review, principally following the regional and national meetings held in Bath during mid-October. A reviewed plan will presented to the next Integrity Standards Board for consideration.</p>	

NOT PROTECTIVELY MARKED

2 Development Measures	
MEASURE	2.4 To review staff survey and incorporate any relevant recommendations in this development action plan
OWNER	Head of Strategic Development / Ch. Superintendent I&I
AIM/RATIONALE	To inform development of this plan and address concerns raised in the Staff Survey.
MEASUREMENT	Review complete and action plan amended
DUE BY	March 2018
TRAFFIC LIGHT CRITERIA	Green: Review complete and action plan amended Amber: review complete but no changes to action plan. Red: review not yet complete
TRAFFIC LIGHT	GREEN /COMPLETE
CURRENT POSITION	
<p>The last Staff Survey was completed by mid 2017. Several indicators within the survey were based on perceptions of organisational fairness and integrity. The Ch.Supt I&I holds responsibility for ensuring that the findings of the survey are implemented. When the survey was being set and conducted, it was envisaged that the results would inform development of this plan; following receipt of the results, the Head of Strategic Development met with Ch. Supt I&I to ascertain the extent to which this could be done.</p> <p>Reviewing the results it was clear that hardly any issues were raised which reflected poorly on organisational integrity; the only such area was a perception of organisational unfairness regarding decisions made at a strategic level. A measure to address that has therefore been included in this plan (2.3).</p> <p>The results were also reviewed to see if there was an opportunity to introduce new integrity indicators into the Integrity Dashboard, however, the Head of Strategic Development and Ch.Supt I&I agreed there is not anything in the survey that would support this.</p>	

NOT PROTECTIVELY MARKED

2 Development Measures	
MEASURE	2.5 To include a question about public perception of integrity in the annual community survey
OWNER	Corporate Communications Director
AIM/RATIONALE	To provide the Force with a baseline indicator of the public’s perception of the extent to which the force acts with integrity.
MEASUREMENT	Question(s) included in survey
DUE BY	December 2018
TRAFFIC LIGHT CRITERIA	Green: Question included in survey and results acted on; Amber: Question included but results not acted on; Red: Question not included
TRAFFIC LIGHT	WHITE
CURRENT POSITION	
<p>The annual survey of the City of London Community is taking place during November. The following question has been posed:</p> <p>Area 4: The City of London Police is responsible for law enforcement within the City of London. The force responsible for law enforcement within the rest of London (outside the City), is the Metropolitan Police Service, a separate organisation. Thinking only about the City of London police, how much do you agree or disagree with the following?</p> <p>The police in this area would treat you with respect if you had contact with them for any reason</p> <p>[The police in this area] ...would treat you fairly if you had contact with them for any reason</p> <p>[The police in this area]would act with integrity if you had contact with them for any reason</p> <p>[The police in this area]are friendly and approachable</p> <p>The police understand your local concerns</p>	

NOT PROTECTIVELY MARKED

2 Development Measures	
MEASURE	2.6 Explore opportunities to include integrity/ethics more explicitly in recruitment processes
OWNER	Head of Organisational Development / HR Director
AIM/RATIONALE	To build on work done last year relating to including code of ethics integrity into new recruit/staff induction processes.
MEASUREMENT	Changes made to processes
DUE BY	July 2018 (with regard to proposals) and September 2018 (for implementation)
TRAFFIC LIGHT CRITERIA	Green: Proposal made and being implemented. Amber: Proposals made but not yet implemented Red: No proposals made by the due date.
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>Best practice from some forces (e.g. Devon and Cornwall) highlights how they have incorporated a more robust ethical dimension in their recruitment, which includes requiring candidates to address questions around integrity at the application and assessment stages of the process. The proposal is to assess the extent to which the force can introduce something similar, and if feasible, implement it.</p> <p>A meeting took place between Head of Strategic Development and Deputy HR Director on 26 September 2018. The Force is adopting the College of Policing's Competency and Values framework. As the name suggests, there are component elements of this that are based on organisational values and integrity. It is being piloted for the current Ch Superintendents process and will be used for the next Inspectors process. It might be possible to enhance this further by using weighted 'filter questions', this will feature in the reviewed Development Plan for 2019.</p>	

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> Police complaints:

Statistics for England and Wales
2017/18

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1

Introduction

This report presents figures on complaints recorded about the police in England and Wales in 2017/18. These complaints, made by members of the public, relate to the conduct of people serving with the police, or to the direction and control (how the force is run) of a police force. They are dealt with under the *Police Reform Act 2002*.

Police forces are responsible for recording complaints¹. Police forces deal with the majority of complaints themselves, with the IOPC only handling the most serious and sensitive cases. People who are not happy with how their complaint has been handled by the police can appeal. In some instances, this appeal is to the IOPC. Other appeals are handled by police forces. This report also presents figures on the number of appeals and decisions on them.

We include a number of indicators throughout the report. These are a useful tool that the police and public can use to judge objectively how well complaints are being handled. Unlike data such as the number

of complaints recorded, where an increase can be interpreted as either good or bad, the indicators are unambiguous. Therefore, they should support police forces to improve the way they handle complaints, where necessary. The results for each indicator give only limited insight when viewed alone, but together they provide a picture of how the police complaints system is performing.

The majority of the data referred to in this report has been recorded on police force IT systems and collected by the IOPC to produce these statistics. We have issued police forces with guidance, which sets out how we expect them to record the data we collect from them. Therefore, the consistency of the data we report relies on police forces applying our guidance correctly when they record their data. Our guidance on how police forces should record complaints under the *Police Reform Act 2002* is available on our website: www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

¹ Information about the initial recording of a complaint is available in section 3 of our Statutory Guidance (2015) www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

The IOPC publishes statistical bulletins for every police force each quarter. These are available on our website: www.policeconduct.gov.uk/research-and-learning/statistics/complaints-statistics. The individual force bulletins give more detail about the indicators referred to above, and compare forces' results with their most similar forces.

You can read more about the IOPC's work on our website: www.policeconduct.gov.uk/who-we-are/accountability-and-performance/annual-report-and-plans. Our annual reports provide an overview of our own performance in relation to investigations, appeals and the complaints that we handle.

2

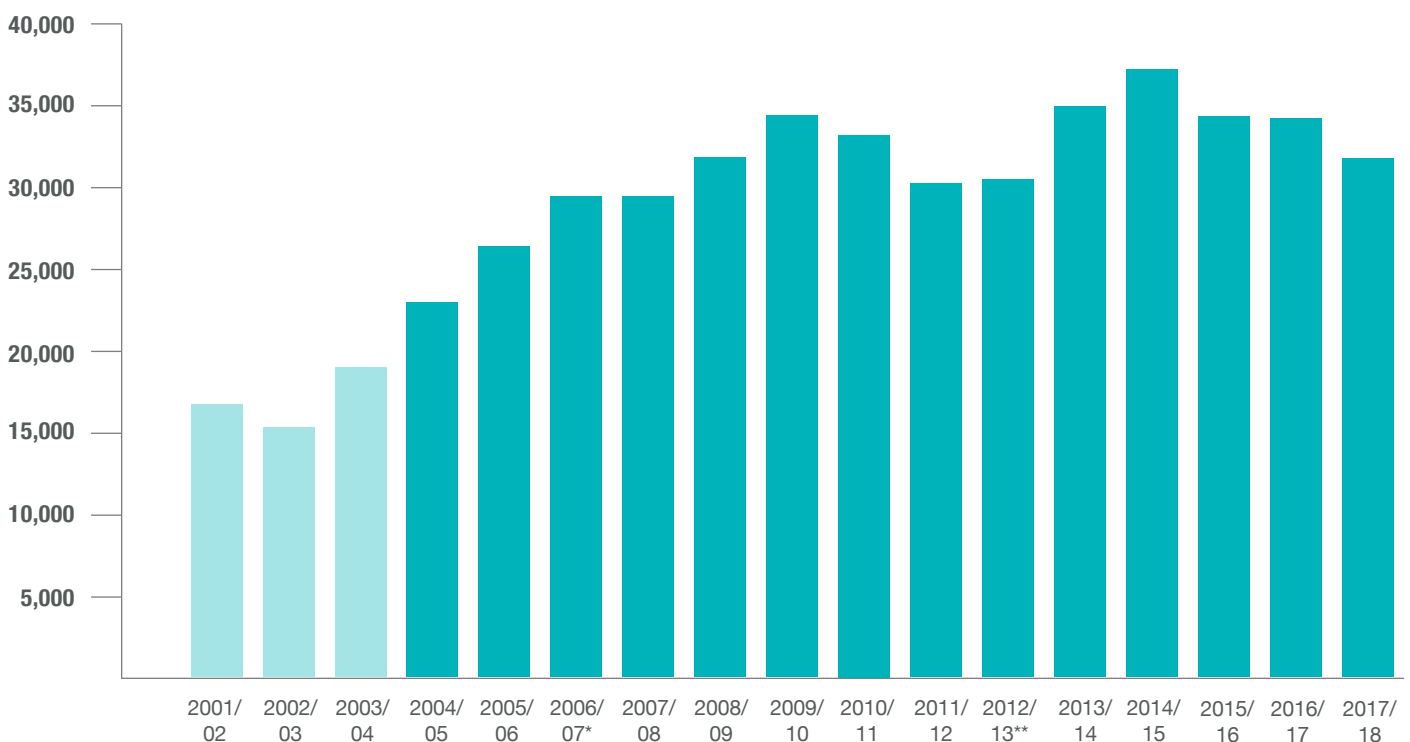
Findings

Complaint cases recorded

The number of complaint cases recorded in 2017/18 fell compared to 2016/17. Police forces continue to record most complaints within the target of ten working days.

- > Forces recorded a total of 31,671 complaint cases in 2017/18 – a 7% drop from 2016/17 (figure 1 and table 2).
- > More than half the forces reduced the number of complaints they recorded. In six forces complaints recorded decreased by more than 20%. In two forces complaints recorded increased by more than 20% (table 3).

Figure 1: Complaint cases recorded 2001/02 – 2017/18



*Figures for British Transport Police are included from this point onwards.

**The definition of a complaint was broadened from this point onwards to include direction and control (applies to complaints received on or after 22 November 2012).

Key indicator: police forces are expected to record complaints within ten working days² (table 4). Timeliness of recording complaint cases within ten working days was stable in 2017/18 at 84 per cent, the same figure as 2016/17.

- > Most forces recorded more than 80% of their complaints within ten working days.
- > Twenty-four forces had maintained or improved the proportion of complaints they recorded on time in 2017/18, compared to 2016/17.

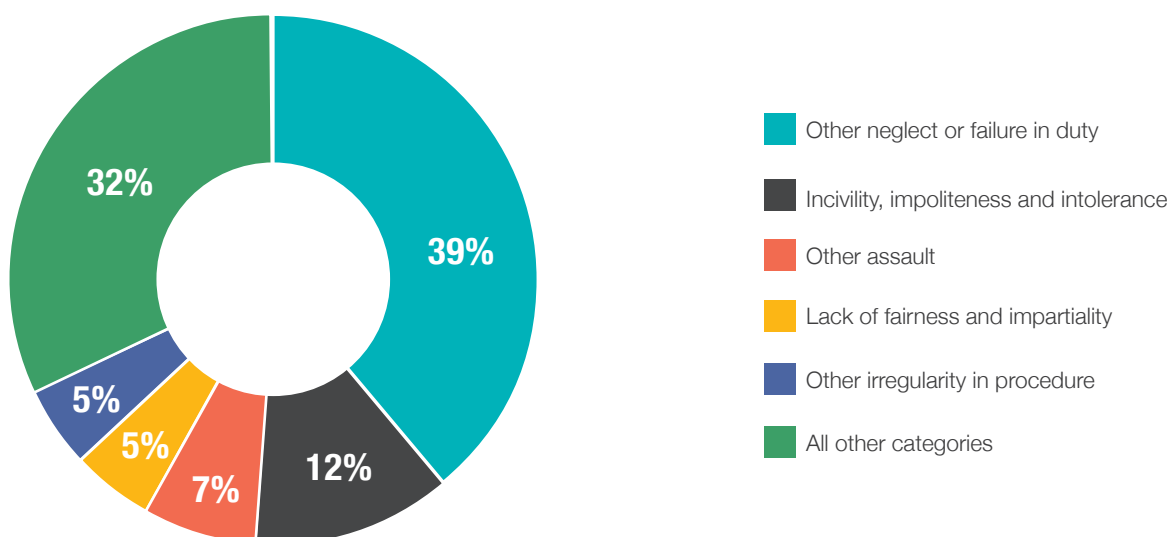
Allegations recorded

A complaint case may include one or more allegations. Each allegation is recorded against one of 27 allegation categories³.

In 2017/18, the number of allegations recorded decreased.

- > During 2017/18, a total of 61,238 allegations were recorded. This is a 4% decrease compared to the previous year (table 5).
- > The five most commonly recorded allegation categories account for 68% of all the allegations recorded in 2017/18 (figure 2 and table 6).
- > The most common allegation was recorded under the 'other neglect or failure in duty' category. This category accounted for 39% of all the allegations recorded in 2017/18; a further increase on 37% in 2016/17 and 35% in 2015/16.
- > Direction and control allegations accounted for 3% of all allegations recorded in 2017/18, compared to 2% in 2016/17⁴.

Figure 2: Allegations recorded in 2017/18 by category



² Information about the initial recording of a complaint is available in section 3 of our Statutory Guidance (2015) www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

³ A full list of the allegation categories and definitions of these is available in our guidance on the recording of complaints under the Police Reform Act 2002 www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

⁴ Information about the types of complaints that should be classified as direction and control is available in section one of our Statutory Guidance (2015) www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

An allegation rate per 1,000 police force employees⁵ is used to provide a meaningful comparison of allegations recorded across forces.

- > In 2017/18, 274 allegations per 1,000 employees across all forces were recorded compared to 279 in 2016/17. Allegation rates across police forces ranged from 139 to 450 per 1,000 employees (table 7).
- > Of the ten forces who had the highest allegation rates in 2017/18, eight were also in the highest ten forces in 2016/17.
- > Of the ten forces who had the lowest allegation rates in 2017/18, nine of them were also in the lowest ten forces in 2016/17.
- > The changes in the numbers of allegations per 1,000 employees varied from an increase of 33% in Nottinghamshire to a decrease of 27% in South Wales.

Allegations finalised

An allegation can be dealt with in several ways. It may be investigated or dealt with through local resolution, or it may be withdrawn, or subject to a disapplication/dispensation⁶ or discontinuance⁷.

Local resolution is a less formal way of dealing with less serious complaints that aims to resolve a complaint in a flexible manner focused on recovering a complainant's confidence in the police.

An investigation is a more formal process, subject to regulations laid under the *Police*

Reform Act 2002. Certain allegations, which could lead to disciplinary or criminal proceedings, must be investigated.

There are also different forms of investigation. For example, the force may investigate a complaint itself (a local investigation), or the IOPC may set out what a force investigation should look at (a supervised investigation). In addition, investigations may be subject to special requirements or not.

For an explanation of the different ways an allegation may be handled, including the different forms of investigation, please see [Annex A](#).

An allegation is considered finalised when the complainant is notified about the outcome of the allegation and any planned action – it does not include any time during which the complainant can appeal.

In 2017/18, forces finalised 60,944 allegations (table 8).

- > 44% of allegations finalised in 2017/18 were investigated and 42% were locally resolved. These figures are similar to 2016/17 (figure 3).

However, there were variations between forces. Six forces finalised 60 per cent or more allegations through a formal investigation, whereas 11 forces dealt with 60 per cent or more allegations through local resolution (table 8).

⁵ 'Force employees' refers to all people employed by a police force who fall within one of these groups: police officers (all ranks, including senior officers), police staff, police community support officers, special constables, traffic wardens and designated officers. Any allegations recorded solely about contracted staff or volunteers are excluded from the calculation for allegations per 1,000 employees.

⁶ In 2012, regulations changed dispensations to disapplications for all the police forces except British Transport Police, who still work to the 2008 regulations.

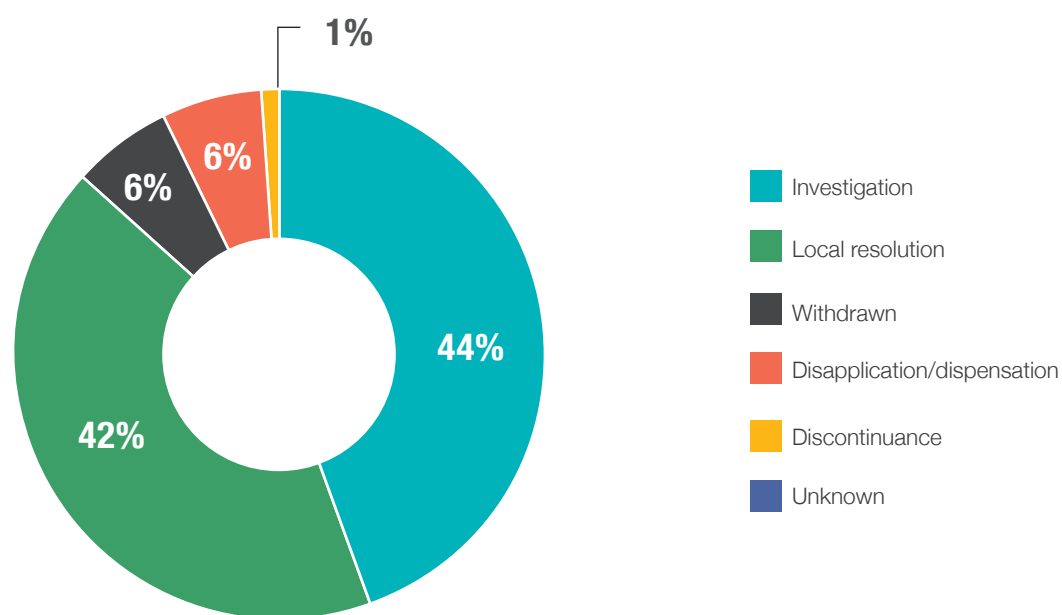
⁷ More information about finalising allegations can be found in our guidance on the recording of complaints under the *Police Reform Act 2002* www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

Allegations not proceeded with

- > Of the total number of allegations finalised in 2017/18, 7% were the subject of a disapplication or discontinuance⁸, a similar proportion to 2016/17.
- > The proportion of allegations dealt with in these ways in 2017/18 varied across police forces from 1% in Hampshire to 17% in Cleveland.

- > 6% of allegations were withdrawn in 2017/18, a similar proportion to 2016/17.
- > The proportion of allegations withdrawn varied across police forces, from 1% in City of London to 14% in Kent.

Figure 3: Method of finalising allegations in 2017/18



Key indicators: overall in 2017/18, the length of time taken to deal with allegations was higher than in 2016/17 (table 9).

- > For allegations finalised by local resolution, it took forces an average of 72 working days (just over three months) to resolve the allegation, an increase compared to the 67 working days in 2016/17.
- > Twenty-eight police forces took longer to

locally resolve allegations in 2017/18 than in 2016/17.

- > On average, it took 173 working days (just over eight months) to locally investigate an allegation, compared to 166 days in 2016/17.
- > There were considerable variations between forces, from an average of 68 days for the City of London to an average of 368 days for Cleveland.

⁸ Thames Valley Police have recorded one dispensation. Given that no other cases were recorded in 2016, the IOPC is satisfied that this is a data entry error and this was a disapplication.

- > Twenty-two forces were quicker or took the same time to locally investigate allegations in 2017/18 than in 2016/17.
- > Fourteen forces took longer, on both local resolution and local investigation, to finalise allegations in 2017/18.
- > Eight forces were quicker, on both local resolution and local investigation, to finalise allegations in 2017/18.

Handling of allegations finalised by investigation

If at any time during an investigation of a complaint, the investigating officer thinks someone whose conduct an investigation relates to, may have

- committed a criminal offence; or
- behaved in a manner that would justify the bringing of disciplinary proceedings⁹

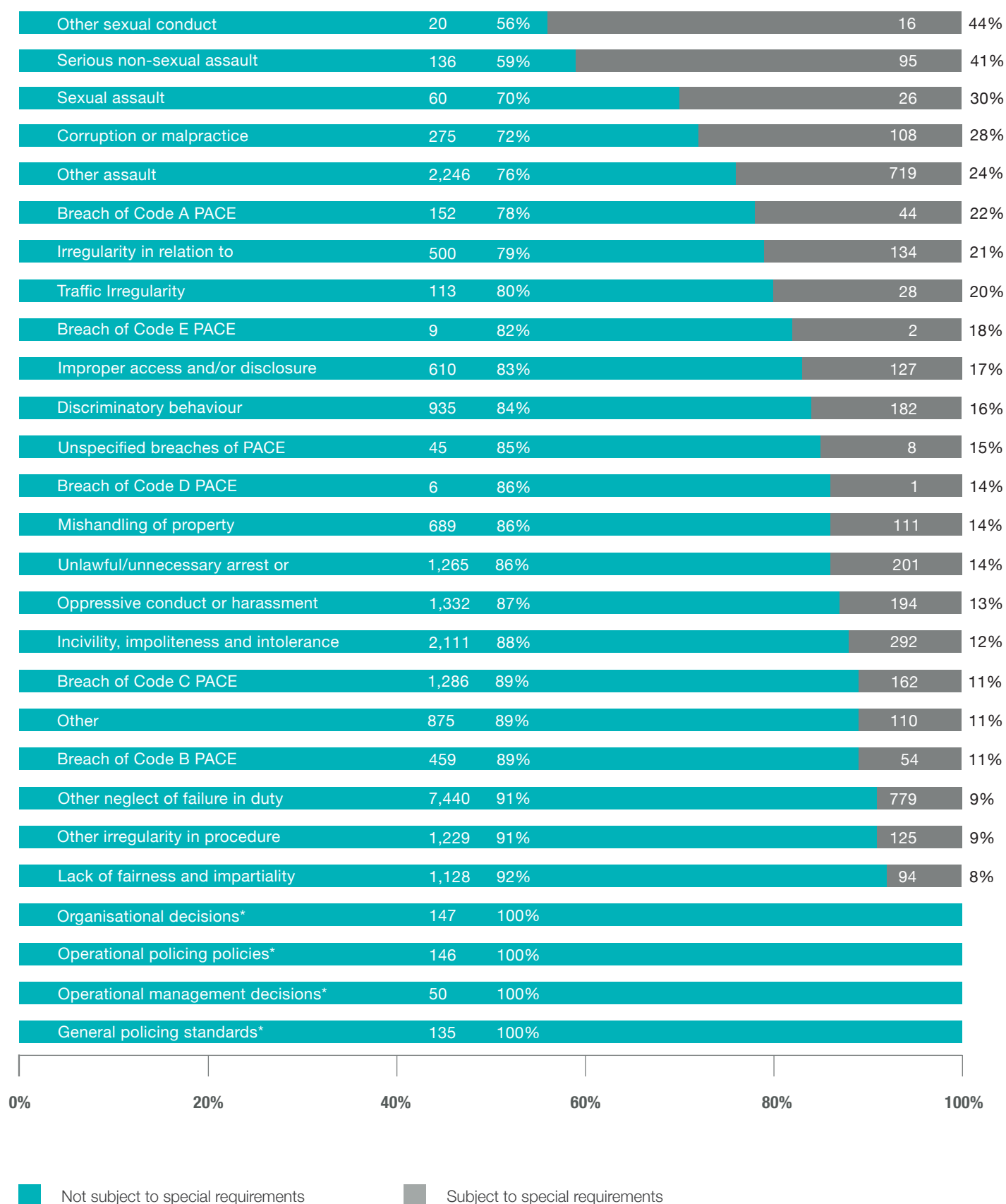
the investigation must be certified as subject to special requirements. (See explanation of 'special requirements' in [Annex A](#).)

- > In 2017/18, 27,011 allegations were finalised by investigation. 13% of these were subject to special requirements (table 10).
- > The proportion of investigated allegations which were subject to special requirements ranged from none in Wiltshire to 54% in South Yorkshire.

There was also variation in the proportion of investigated allegations which were subject to special requirements depending on the category of allegation (figure 4 and table 11). Forty-four per cent of allegations of 'Other sexual conduct' were investigated under special requirements, compared to eight per cent of allegations relating to 'Lack of fairness and impartiality'.

⁹ Disciplinary proceedings for the purposes of special requirements mean any proceedings under the Police (Conduct) Regulations 2012.

Figure 4: Category of allegations finalised by investigation in 2017/18



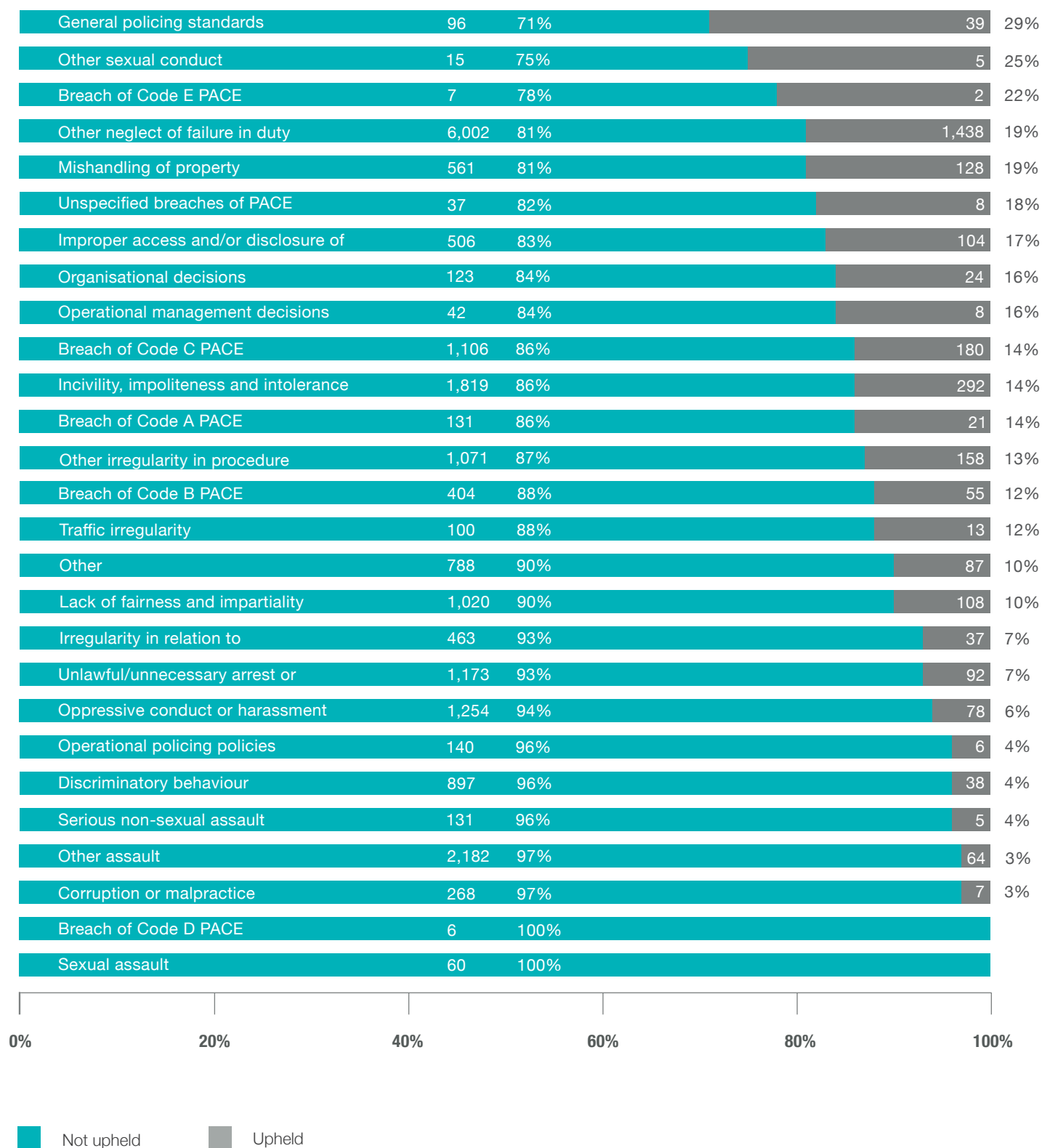
Results of allegations finalised by investigation not subject to special requirements

When an investigation into a complaint is not subject to special requirements, the investigation finishes with an assessment of whether the complaint is upheld or not.

- > Of the 23,399 allegations not subject to special requirements, 13% (2,997) of these were upheld (table 10a).
- > The rate at which allegations were upheld varied across forces, from none in North Yorkshire to 26% in Gwent.
- > Over three quarters of forces (38 of 44) upheld less than 20% of the allegations they investigated outside special requirements.

There was also variation within the categories of allegations investigated, in the proportion of those allegations which were upheld (figure 5 and table 11a). Twenty-nine per cent of allegations about 'General policing standards' were upheld, compared to none of the allegations of 'Sexual assault' or 'Breach of Code D PACE'.

Figure 5: Category of allegations finalised by investigation not subject to special requirements in 2017/18



Complaint cases finalised

A complaint case is considered finalised when all actions relating to that case are complete.

This includes:

- the time during which an appeal can be lodged
- the time it takes to deal with an appeal if one has been made
- the time it takes for misconduct and/or criminal proceedings to be concluded¹⁰

> A total of 31,524 complaints were finalised in 2017/18. This is a decrease of 4% compared to 2016/17 and is the second year in a row that this figure has decreased.

Key indicator: complaint cases took longer to finalise in 2017/18 (table 12).

- > It took an average of 116 working days to finalise complaint cases in 2017/18, an increase of four working days compared to 2016/17.
- > The average time across police forces ranged from 48 to 230 working days.

A complaint can be subject to one or more periods in suspension (see explanation of 'suspension' in [Annex A](#)).

- > If the time that complaint cases were suspended is discounted, the average time to finalise complaint cases was 108 working days in 2017/18. This is six days more than the average time reported in 2016/17.

- > The average time across police forces ranged from 42 to 224 working days.

Appeals

A complainant has the right to appeal about the way in which a police force has handled their complaint. There are different types of appeal each relating to a different process for dealing with a complaint. An appeal can be made about:

- the decision not to record a complaint
- the outcome of a local resolution process
- the decisions on a local or supervised investigation
- the decision to discontinue a local investigation
- the decision to disapply the requirements under the *Police Reform Act 2002*, or
- the outcome of a complaint that has been subject to disapplication¹¹

All appeals about complaints not being recorded are dealt with by the IOPC. For all other types of appeal, there is a test to determine whether the appeal should be considered by the IOPC or the relevant chief officer¹².

Appeals received

In 2017/18, the total number of appeals received across the entire police complaints system fell by eight per cent compared to 2016/17.

¹⁰ Our guidance on the recording of complaints under the *Police Reform Act 2002* www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance includes more information about finalising complaint cases

¹¹ Information about the different appeal rights is available in section 13 of our Statutory Guidance (2015) www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

¹² See Annex A for the definition of 'Chief officer'. Chief officers began dealing with appeals relating to complaint cases received on or after 22 November 2012. More information about the test to determine who should deal with an appeal is set out in section 13 of our Statutory Guidance (2015) www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

- > The IOPC¹³ received 1,554 non-recording appeals, a decrease of eight per cent from the previous year.
- > The number of local resolution appeals received by either the IOPC or the relevant chief officer was 2,315, a decrease of one per cent from the previous year.

- > The number of investigation appeals received was 2,576, a decrease of 14 per cent from the previous year.

Figure 6: Appeals received 2013/14 – 2017/18

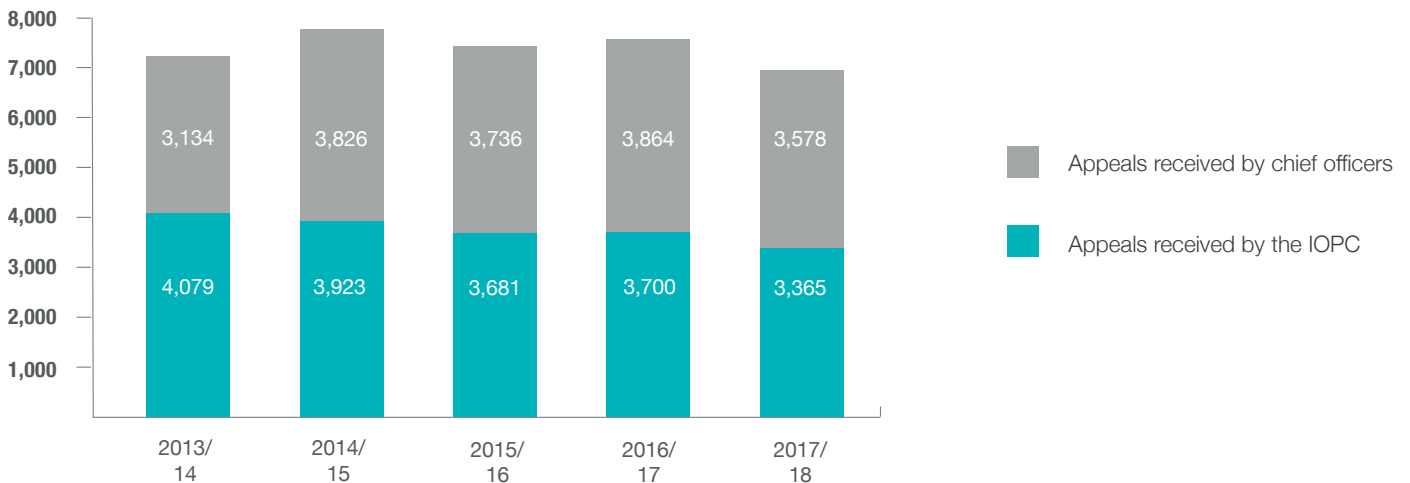
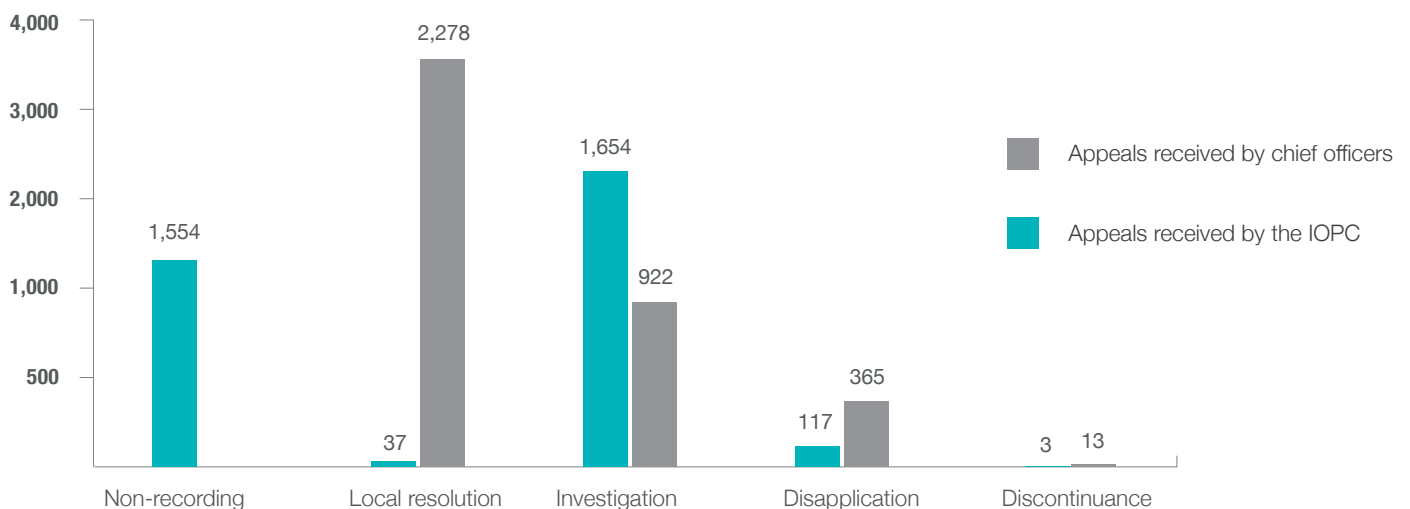


Figure 7: Appeals received in 2017/18 by appeal body and appeal type



¹³ The right of appeal against non-recording is to the IOPC only.

Chief officer appeals received:

In 2017/18, chief officers received 3,578 appeals about the way their force handled a complaint. This represents a seven per cent decrease on the number received in 2016/17 (table 13 and figure 6).

- > The number of local resolution appeals chief officers received increased by 1% compared to 2016/17. These represent just under two thirds of all the appeals chief officers received in 2017/18 (tables 13 and 14 and figure 7)
- > The number of appeals received about an investigation into a complaint decreased by 23% compared to the number received in 2016/17. This represented just over a quarter of all the appeals received by chief officers in 2017/18 (tables 13 and 14 and figure 7).
- > The number of disapplication appeals received decreased in 2017/18 by 10% to 365 while discontinuance appeals increased from 5 to 13 (table 13 and figure 7).
- > Four forces did not receive any investigation appeals (table 14).

IOPC appeals received:

In 2017/18, the IOPC received a total of 3,365 appeals about the handling of a complaint by a police force. This is a decrease of nine per cent compared to the number received in 2016/17 (table 16).

- > The number of non-recording appeals received decreased by 8% compared to 2016/17. This represented just under half of all the appeals received by the IOPC in 2017/18 (tables 16 and 17 and figure 7)
- > The number of local resolution appeals received fell by 55% compared to 2016/17 – the IOPC received 37 of these appeals in 2017/18 and 82 in 2016/17. This represented 1% of the appeals received by the IOPC in 2017/18 (tables 16 and 17 and figure 7).
- > The number of appeals received about an investigation into a complaint decreased by 8% compared to the number received in 2016/17. This represented just under half of all the appeals received in 2017/18 (tables 16 and 17 and figure 7).
- > The number of disapplication appeals received decreased in 2017/18 by 9% to 117. Discontinuance appeals also decreased from 7 to 3 (table 16).

Appeals upheld

For most appeal types, the upholding rates of both the IOPC and chief officers were similar to their rates in 2016/17. The IOPC also continued to uphold more appeals than chief officers. There remained considerable variations between forces in both their own upheld rates and the IOPC's upheld rate.

Table 1: Appeals completed and upheld in 2017/18 by relevant appeal body and appeal type

Appeal type	IOPC			Chief officer appeals		
	Number valid completed*	Number upheld	% upheld	Number valid completed*	Number upheld	% upheld
Non-recording**	1,445	524	36			
Local resolution	38	24	63	2,068	321	16
Investigation	1,703	643	38	1,039	167	16
Disapplication	101	11	11	344	26	8
Discontinuance	3	0	0	12	0	0

*Some appeals may be deemed 'invalid' (i.e. there was no right of appeal) and these have been excluded from the number of 'valid completed' and the calculation for '% upheld'.

**All non-recording appeals are determined by the IOPC.

Chief officer appeals upheld:

Key indicators: in 2017/18, the proportion of both local resolution and investigation appeals upheld by chief officers decreased slightly compared to 2016/17.

- > 16% of local resolution appeals completed by chief officers were upheld in 2017/18. This compares to 17% in the previous two years. The upholding rate across police forces ranged from 2% in Leicestershire to 39% in the Metropolitan (excluding four forces who completed fewer than ten local resolution appeals) (tables 13 and 15).
- > In 2017/18, 16% of investigation appeals were upheld, compared to 18% in 2016/17. The upholding rate varied considerably across police forces from 0% in Warwickshire and West Mercia to 30% in Norfolk (excluding one police force with 33% upheld, based on only three appeals). Eight forces did not complete any investigation appeals (tables 13 and 15).

- > 8% of disapplication appeals were upheld. Caution is needed when comparing police forces because of the small number of appeals sometimes involved – 30 of the 44 forces completed fewer than ten disapplication appeals. Three completed none (table 15).
- > In 2017/18, 12 discontinuance appeals were completed, none of which were upheld (table 15).

IOPC appeals upheld:

Key indicators: the proportion of non-recording and investigation appeals upheld by the IOPC in 2017/18 was similar to 2016/17, but the proportion of local resolution appeals upheld decreased (table 16).

- > The upholding rate for non-recording appeals continued to decrease in 2017/18. 36% of the non-recording appeals completed were upheld. The upholding rate varied considerably across police forces from 18% for City of London to 79% in

North Yorkshire (excluding one force with fewer than ten appeals completed) (table 18).

- > 63% (24 of 38) of the local resolution appeals completed were upheld, which is lower than in 2016/17 when the IOPC upheld 75% (52 of 69) of local resolution appeals (table 16). We did not receive more than ten appeals for any single force.
- > In 2017/18, 38% of the investigation appeals completed were upheld. This is slightly lower than last year when the IOPC upheld 40% of investigation appeals. The upholding rate varied considerably across police forces from 17% for Hampshire and North Wales to 60% for Thames Valley (excluding four forces with fewer than ten appeals completed) (tables 16 and 18).
- > In 2017/18, the IOPC upheld 11% (11 of 101) of the disapplication appeals completed. This is lower than last year when the IOPC upheld 15% (20 of 130) of the disapplication appeals (table 16).

Grounds for upholding appeals made to the IOPC

The IOPC considers appeals about the handling of complaints on various grounds, and can uphold the appeal on one or more of these grounds. This means that the sum of appeals upheld on each ground will not equal the number of appeals upheld by the IOPC in 2017/18¹⁴. The IOPC does not hold data on the grounds on which chief officer appeals were upheld.

The grounds for non-recording appeals are:

- whether the appropriate authority¹⁵ failed to make a recording decision in relation to the complaint
- whether the appropriate authority that received the complaint failed to forward it to the correct appropriate authority
- whether the recording decision made was correct

Of the non-recording appeals the IOPC completed and upheld in 2017/18:

- > 182 (35%) were upheld because the appropriate authority had failed to make a recording decision, back to the levels seen in 2015/16 (192, 41%) having been higher in 2016/17 (298, 54%).
- > 21 (4%) were upheld because the police force that received the complaint failed to pass it on to the correct appropriate authority, a similar level to last year.
- > 319 (61%) were upheld because the recording decision was incorrect, back to the levels seen in 2015/16 (300, 63%) having been lower in 2016/17 (230, 42%).

The grounds for investigation appeals are:

- the level of information provided to the complainant about the findings of the investigation and any action to be taken
- the findings of the investigation
- the determination(s) in relation to misconduct, gross misconduct or performance

¹⁴ Information about the grounds of appeal is available in section 13 of our Statutory Guidance (2015) www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

¹⁵ Legal definitions are available in section 15 of our Statutory Guidance (2015) www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

- the decisions about the action to be taken or not, as a result of the investigation
- the decision not to refer the report to the Crown Prosecution Service (CPS)

Of the investigation appeals completed and upheld by the IOPC in 2017/18:

- > More than a third (263, 41%) were upheld on the ground that the complainant was given inadequate information.
- > Most (541, 84%) were upheld on the findings of the investigation.
- > 117 (18%) were upheld on the determination(s) in relation to misconduct, gross misconduct or performance.
- > 230 (36%) were upheld on the action to be taken (or not taken) as a result of the investigation.
- > The least common ground on which investigation appeals were upheld was the determination not to make a referral to the CPS. Only 15 appeals (2%) were upheld on this ground.

Profile of complainants

In 2017/18, 31,719 people complained about the conduct of someone serving with the police, or about the direction and control of a police force. This is a decrease of 7% compared to 2016/17 when 34,286 people complained.

- > Most complainants were men (18,956, 60%). This has been the case for every year since 2004/05 (table 19).
- > Where known, most complainants were White (14,516), which is similar to previous years. It should be noted that the ethnicity of 43% (13,725) of complainants was either not stated or unknown (table 20).
- > Where age is known, the most common age groups to complain about the police in 2017/18 were those aged 30 to 39 years (5,839, 18%) and those aged 40 to 49 years (5,760, 18%). The people who least commonly complained were aged 17 or under (257, 1%). The age of 25% of complainants (7,872) was unknown (table 21).

Profile of people who were subject of a complaint

In 2017/18, 34,913 people serving with the police were subject to a recorded complaint – a decrease of 5% compared to 2016/17, when 36,687 were subject to a recorded complaint.

- > The profile of those subject to a recorded complaint about the police has not changed significantly since 2004/05.
- > In 2017/18, most people subject to a recorded complaint were police officers (30,406, 87%, table 22).
- > 71% (24,682) of those subject to a recorded complaint were men (table 23) and 84% (29,261) were White (table 24).

3

Discussion

The 2017/18 complaint statistics show again there are wide variations from force to force. These variations mean it is not possible to draw meaningful national conclusions on a number of aspects of the police complaints system. This points to an overly complex system, which is due to change in 2019 with the implementation of the Home Office's reforms, which aim to simplify the process for handling complaints.

Recorded complaints

A number of factors can influence any rise or fall in the number of complaints recorded by police forces. Public satisfaction with the police service may lead to fewer complaints being made, but conversely a lack of faith in the effectiveness of the complaints system could mean that people do not raise their concerns. A decrease in complaints could suggest some people struggle to access the system. Therefore, as we have stated in previous reports, a rise or fall in the complaints statistics should not be used as a performance measure for the complaints system. The IOPC is aware that the number of complaints formally recorded has been declining since the Home Office published its [proposals](#) for

reform of the police complaints system, which includes handling certain matters outside the formal complaints system when they relate to the service someone has received. Although these matters are currently not captured and reported on, this will change under the new system.

Complaint categories

As in previous years, the category 'other neglect or failure in duty' contains the largest number of complaints. This 'catch-all' category does not really explain what the individual complaints are about. Effective categorisation of complaints is vital to ensure effective insight into what is generating complaints and affecting public confidence in policing. As part of our work for the new police complaints system, the IOPC is working with the Home Office and stakeholders to make the categorisation of complaints more meaningful.

Timeliness

Overall, complainants are waiting longer for their complaint to reach a conclusion. For those complaints locally resolved, this increased by five days to 72 days. However,

this does vary dramatically from force to force – under 30 days for three forces (Gwent, West Yorkshire and British Transport Police) to 100 days or more for four forces (Humberside, Norfolk, West Midlands and Greater Manchester).

The time taken for the police to investigate complaint allegations also increased this year by seven days to 173 days. Again, this varied from under 100 days for three forces (City of London, Cheshire and Derbyshire) to 300 days or more for three forces (West Midlands, North Yorkshire and Cleveland). Reasons for this are also varied and there is not a clear national picture.

Outcome of investigated allegations

In October 2014, a legal judgement ruled that when an allegation was investigated under special requirements, it is not possible to conclude whether an allegation is upheld or not upheld. This is the first year since 2014/15 that the IOPC has been able to publish data on the outcomes of allegations that have been investigated. The data is not directly comparable because the 2014/15 data contains the outcome of all investigated allegations whereas the data for 2017/18 reports only on the outcome of allegations investigated without special requirements. However, in 2014/15, 14 per cent of allegations were upheld, in 2017/18 it was 13 per cent.

There may be good reasons why an allegation is not upheld and a low rate of upheld allegations is not necessarily, on its own, a cause for concern. Further work is needed to understand why the rate is low, particularly in

the 14 forces that are upholding less than one in ten of their complaints.

Appeals against investigation

This is the third year in a row that the number of investigation appeals received by chief officers has decreased. Appeals to the IOPC have also fallen year on year, though by a lesser amount (a decrease of 136 this year, from 1,790 in 2016/17 to 1,654 in 2017/18). When the police complaints system changed in 2012, certain appeals were directed to the chief officer of a force, rather than to the IPCC (now IOPC). We were concerned the public might have little confidence that an appeal to the same police force that had investigated a complaint could result in a fully impartial review. We welcome the coming changes that will now give Police and Crime Commissioners responsibility for conducting these reviews.

Complainant demographic information

It is disappointing to see that the proportion of complainants where their ethnicity or age is unknown remains high this year at 43 per cent and 25 per cent respectively. If the system does not know who is making police complaints, it cannot have an informed view on what is generating complaints and take the actions needed to improve public confidence in operational policing. We know from other research that certain groups have lower confidence in policing. It is important that forces work to improve their data collection on complainant demographics, including proactively asking for those details upon receipt of the complaint. Good complaints handling puts engagement with

the complainant at the forefront of the initial actions to be taken on receipt of a complaint and we would expect this to include proactive work to collect demographic information from complainants.

Statistical note

- In the percentage columns presented in the following tables, '-' denotes no data and '0' denotes less than 0.5%.
- Some percentages may add up to more or less than 100% due to rounding.
- Average times are presented as working days and do not include weekends or bank holidays.
- Complaint cases and allegations with invalid start/end dates have been removed from average time calculations. Therefore, the numbers of complaint cases and allegations used in the average time calculations may be lower than the total number of complaint cases and allegations finalised.

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Tables

Table 1: Appeals completed and upheld in 2017/18 by appeal body and appeal type

Appeal type	IOPC			Chief officer appeals		
	Number valid completed*	Number upheld	% upheld	Number valid completed*	Number upheld	% upheld
Non-recording**	1,445	524	36			
Local resolution	38	24	63	2,068	321	16
Investigation	1,703	643	38	1,039	167	16
Disapplication	101	11	11	344	26	8
Discontinuance	3	0	0	12	0	0

*Some appeals may be deemed 'invalid' (i.e. there was no right of appeal) and these have been excluded from the number of 'valid completed' and the calculation for '% upheld'.

**All non-recording appeals are determined by the IOPC.

Table 2: Complaint cases recorded 2001/02 – 2017/18

	2001/02	2002/03	2003/04	2004/05	
Total recorded in year	16,654	15,248	15,885	22,898	
% annual change	-12	-8	4	44	
	2005/06	2006/07*	2007/08	2008/09	
Total recorded in year	26,268	29,322	29,350	31,747	
% annual change	15	12	0	8	
	2009/10	2010/11	2011/12	2012/13**	
Total recorded in year	34,310	33,099	30,143	30,365	
% annual change	8	-4	-9	1	
	2013/14	2014/15	2015/16	2016/17	2017/18
Total recorded in year	34,863	37,105	34,247	34,103	31,671
% annual change	15	6	-8	0	-7

*Figures for British Transport Police are included from this point onwards.

**The definition of a complaint was broadened from this point onwards to include detection and control (applies to complaints received on or after 22 November 2012).

Table 3: Complaint cases recorded in 2017/18 and comparison with previous year

Police force	2016/17	2017/18	Percentage change from 2016/17
Avon and Somerset	1,019	919	-10
Bedfordshire	488	442	-9
British Transport Police	371	305	-18
Cambridgeshire	383	328	-14
Cheshire	595	524	-12
City of London	276	233	-16
Cleveland	454	487	7
Cumbria	307	335	9
Derbyshire	383	387	1
Devon and Cornwall	1,188	1,216	2
Dorset	506	537	6
Durham	314	330	5
Dyfed-Powys	274	313	14
Essex	806	602	-25
Gloucestershire	431	403	-6
Greater Manchester	1,537	1,518	-1
Gwent	287	266	-7
Hampshire	931	960	3
Hertfordshire	518	533	3
Humberside	760	908	19
Kent	762	721	-5
Lancashire	997	756	-24
Leicestershire	662	536	-19
Lincolnshire	596	488	-18
Merseyside	548	469	-14
Metropolitan	5,836	5,071	-13
Norfolk	416	461	11
North Wales	452	484	7
North Yorkshire	331	283	-15
Northamptonshire	509	483	-5
Northumbria	758	738	-3
Nottinghamshire	670	871	30
South Wales	770	604	-22
South Yorkshire	607	460	-24
Staffordshire	421	433	3
Suffolk	317	337	6
Surrey	482	406	-16
Sussex	935	1,127	21
Thames Valley	1,346	1,303	-3
Warwickshire	415	328	-21
West Mercia	733	686	-6
West Midlands	882	777	-12
West Yorkshire	2,167	1,708	-21
Wiltshire	663	595	-10
Total	34,103	31,671	-7

Table 4: Complaint cases recorded in time 2013/14 to 2017/18 (continues on next page)

Police force	2013/14		2014/15		2015/16	
	Complaint cases recorded*	% within 10 working days	Complaint cases recorded*	% within 10 working days	Complaint cases recorded*	% within 10 working days
Avon and Somerset	1,189	93	1,322	94	1,158	94
Bedfordshire	353	90	401	91	363	93
British Transport Police	418	94	396	95	350	98
Cambridgeshire	384	93	461	90	367	94
Cheshire	568	95	579	99	537	96
City of London	234	95	256	96	261	94
Cleveland	454	85	501	91	609	75
Cumbria	328	74	302	80	307	89
Derbyshire	443	94	454	91	441	90
Devon and Cornwall	1,364	53	1,515	80	1,218	97
Dorset	391	97	453	98	489	93
Durham	303	86	314	90	399	94
Dyfed-Powys	328	92	268	73	256	94
Essex	933	92	1,153	92	945	93
Gloucestershire	336	70	438	95	381	92
Greater Manchester	1,536	65	1,890	47	1,616	89
Gwent	311	97	398	94	325	88
Hampshire	968	88	926	92	868	90
Hertfordshire	541	96	568	92	496	95
Humberside	541	89	521	77	529	73
Kent	1,200	92	1,187	94	842	88
Lancashire	875	80	1,031	82	884	79
Leicestershire	677	86	846	85	689	92
Lincolnshire	510	94	567	94	549	93
Merseyside	695	95	617	98	458	91
Metropolitan	7,115	65	6,828	68	6,293	86
Norfolk	518	97	449	96	413	95
North Wales	330	90	473	83	441	91
North Yorkshire	544	89	517	95	291	85
Northamptonshire	444	100	434	97	473	92
Northumbria	794	82	1,018	87	716	92
Nottinghamshire	960	97	1,023	95	967	95
South Wales	721	61	864	60	807	80
South Yorkshire	459	74	660	80	602	90
Staffordshire	310	79	516	89	410	89
Suffolk	381	98	328	96	289	97
Surrey	693	91	546	84	515	91
Sussex	900	67	943	69	916	77
Thames Valley	1,043	95	1,305	95	1,304	93
Warwickshire	215	67	200	84	259	80
West Mercia	592	74	513	76	509	80
West Midlands	1,473	66	1,145	44	1,168	73
West Yorkshire	1,000	94	1,255	80	1,867	94
Wiltshire	489	65	712	46	665	80
Total	34,861	80	37,093	80	34,242	88

The IOPC expects police forces to record complaints as soon as possible and within ten working days.

*The number of complaint cases presented in this table are only those with valid dates that are used in the calculation for % complaint cases recorded within 10 working days. Therefore they may not match the actual number of recorded complaint cases presented in Table 3.

Table 4: Complaint cases recorded in time 2013/14 to 2017/18 (continued)

Police force	2016/17		2017/18	
	Complaint cases recorded*	% within 10 working days	Complaint cases recorded*	% within 10 working days
Avon and Somerset	1,019	97	919	97
Bedfordshire	488	90	442	92
British Transport Police	371	97	305	98
Cambridgeshire	383	91	328	88
Cheshire	595	96	524	96
City of London	276	99	233	98
Cleveland	454	84	487	88
Cumbria	307	86	335	86
Derbyshire	383	88	387	87
Devon and Cornwall	1,188	98	1,216	73
Dorset	506	94	537	94
Durham	314	93	330	89
Dyfed-Powys	274	91	313	93
Essex	806	91	602	93
Gloucestershire	431	95	403	92
Greater Manchester	1,537	82	1,518	55
Gwent	287	96	266	91
Hampshire	931	90	960	90
Hertfordshire	518	90	533	93
Humberside	760	61	908	57
Kent	762	95	721	91
Lancashire	997	89	756	85
Leicestershire	662	93	536	93
Lincolnshire	596	89	488	98
Merseyside	548	86	469	88
Metropolitan	5,836	63	5,071	77
Norfolk	416	93	461	87
North Wales	452	95	484	96
North Yorkshire	331	85	283	81
Northamptonshire	509	94	483	95
Northumbria	758	93	738	91
Nottinghamshire	670	94	871	96
South Wales	770	88	604	92
South Yorkshire	607	77	460	91
Staffordshire	421	84	433	88
Suffolk	317	92	337	87
Surrey	482	86	406	78
Sussex	935	72	1,127	80
Thames Valley	1,346	97	1,303	95
Warwickshire	415	95	328	91
West Mercia	733	95	686	86
West Midlands	882	43	777	31
West Yorkshire	2,167	96	1,708	96
Wiltshire	663	96	595	96
Total	34,103	84	31,671	84

The IOPC expects police forces to record complaints as soon as possible and within ten working days.

*The number of complaint cases presented in this table are only those with end dates that are used in the calculation for % complaint cases recorded within 10 working days. Therefore they may not match the actual number of recorded complaint cases presented in Table 3.

Table 5: Number of allegations recorded in 2017/18 and comparison with previous year

Police force	Number of allegations 2016/17	Number of allegations 2017/18	Change in number of allegations	% change from 2016/17 to 2017/18
Avon and Somerset	1,923	1,861	-62	-3
Bedfordshire	932	956	24	3
British Transport Police	730	680	-50	-7
Cambridgeshire	909	791	-118	-13
Cheshire	1,238	1,134	-104	-8
City of London	384	326	-58	-15
Cleveland	631	823	192	30
Cumbria	439	474	35	8
Derbyshire	597	621	24	4
Devon and Cornwall	2,348	2,205	-143	-6
Dorset	694	710	16	2
Durham	573	530	-43	-8
Dyfed-Powys	509	581	72	14
Essex	1,483	1,391	-92	-6
Gloucestershire	831	787	-44	-5
Greater Manchester	3,040	2,486	-554	-18
Gwent	584	669	85	15
Hampshire	1,604	1,656	52	3
Hertfordshire	1,248	1,274	26	2
Humberside	1,440	1,472	32	2
Kent	1,175	1,250	75	6
Lancashire	1,908	1,609	-299	-16
Leicestershire	1,446	1,334	-112	-8
Lincolnshire	965	703	-262	-27
Merseyside	1,592	1,274	-318	-20
Metropolitan	12,473	12,607	134	1
Norfolk	951	852	-99	-10
North Wales	856	971	115	13
North Yorkshire	727	558	-169	-23
Northamptonshire	1,024	988	-36	-4
Northumbria	1,676	1,673	-3	0
Nottinghamshire	1,062	1,329	267	25
South Wales	979	741	-238	-24
South Yorkshire	1,161	890	-271	-23
Staffordshire	855	859	4	0
Suffolk	623	598	-25	-4
Surrey	1,393	1,717	324	23
Sussex	1,350	1,561	211	16
Thames Valley	2,008	1,914	-94	-5
Warwickshire	489	394	-95	-19
West Mercia	907	886	-21	-2
West Midlands	2,143	1,753	-390	-18
West Yorkshire	2,956	2,541	-415	-14
Wiltshire	896	809	-87	-10
Total	63,752	61,238	-2,514	-4

Please note: the figures for City of London also include allegations recorded in relation to 'Action Fraud'. Action Fraud is a national service provided by City of London Police, which receives and records allegations and intelligence relating to crimes of fraud. Complaints about this service are usually recorded against one of the direction and control allegation categories.

Table 6: Nature of allegations recorded in 2017/18

Allegation groupings	Allegation category	N	%
Oppressive behaviour	Serious non-sexual assault	208	0
	Sexual assault	134	0
	Other assault	4,391	7
	Oppressive conduct or harassment	3,049	5
	Unlawful/unnecessary arrest or detention	2,230	4
Malpractice	Irregularity in relation to evidence/perjury	898	1
	Corruption or malpractice	587	1
	Mishandling of property	1,827	3
Breach of PACE	Breach of Code A PACE on stop and search	277	0
	Breach of Code B PACE on searching of premises and seizure of property	1,081	2
	Breach of Code C PACE on detention, treatment and questioning	2,282	4
	Breach of Code D PACE on identification procedures	13	0
	Breach of Code E PACE on tape recording	20	0
	Unspecified breaches of PACE which cannot be allocated to a specific code	66	0
Lack of fairness and impartiality	Lack of fairness and impartiality	3,066	5
Discriminatory behaviour	Discriminatory behaviour	1,668	3
Other neglect of duty	Other neglect or failure in duty	23,820	39
Incivility	Incivility, impoliteness and intolerance	7,291	12
Traffic	Traffic irregularity	503	1
Other	Other irregularity in procedure	3,103	5
	Improper access and/or disclosure of information	1,414	2
	Other sexual conduct	59	0
	Other	1,624	3
Direction and control	General policing standards	519	1
	Operational management decisions	237	0
	Operational policing policies	354	1
	Organisational decisions	517	1
Total allegations		61,238	100

Table 7: Number of allegations recorded per 1,000 employees in 2017/18

Police force	Allegations recorded against employees only	Number of employees*	Allegations per 1,000 employees
Avon and Somerset	1,813	5,323	341
Bedfordshire	939	2,224	422
British Transport Police	664	4,775	139
Cambridgeshire	778	2,468	315
Cheshire	1,118	3,937	284
City of London	176	1,159	152
Cleveland	786	1,747	450
Cumbria	370	1,854	200
Derbyshire	600	3,321	181
Devon and Cornwall	2,018	5,159	391
Dorset	706	2,608	271
Durham	529	2,178	243
Dyfed-Powys	575	2,088	275
Essex	1,376	5,207	264
Gloucestershire	776	1,952	398
Greater Manchester	2,479	11,022	225
Gwent	628	1,930	325
Hampshire	1,628	5,371	303
Hertfordshire	1,250	3,633	344
Humberside	1,323	3,225	410
Kent	1,220	5,915	206
Lancashire	1,566	5,313	295
Leicestershire	1,285	3,592	358
Lincolnshire	679	1,654	411
Merseyside	1,249	5,796	215
Metropolitan	12,460	44,535	280
Norfolk	850	2,942	289
North Wales	934	2,719	344
North Yorkshire	546	2,723	201
Northamptonshire	968	2,501	387
Northumbria	1,662	5,081	327
Nottinghamshire	1,257	3,303	381
South Wales	713	5,100	140
South Yorkshire	851	4,840	176
Staffordshire	839	3,338	251
Suffolk	596	2,220	268
Surrey	1,661	3,792	438
Sussex	1,528	4,903	312
Thames Valley	1,902	7,832	243
Warwickshire	385	1,747	220
West Mercia	862	4,213	205
West Midlands	1,644	10,485	157
West Yorkshire	2,530	9,115	278
Wiltshire	775	2,121	365
Total	59,494	216,961	274

This table excludes contracted staff and volunteers and the allegations made solely against them. It also excludes direction and control allegations as no subject is recorded on direction and control allegations.

* 'Number of employees' is taken from the Home Office publication *Police Workforce, England and Wales*, 31 March 2017.

Table 8: Means by which allegations were finalised in 2017/18

Police force	Local resolution		Investigation		Withdrawn		Disapplication		Dispensation		Discontinuance		Unknown		Total
	N	%	N	%	N	%	N	%	N	%	N	%	N	%	N
Avon and Somerset	1,196	66	394	22	79	4	128	7	0	0	13	1	0	0	1,810
Bedfordshire	584	50	505	43	50	4	20	2	0	0	10	1	0	0	1,169
British Transport Police	56	10	470	82	33	6	16	3	0	0	0	0	0	0	575
Cambridgeshire	478	56	287	33	54	6	35	4	0	0	5	1	0	0	859
Cheshire	525	44	598	50	47	4	7	1	0	0	18	2	0	0	1,195
City of London	180	61	99	34	3	1	6	2	0	0	5	2	0	0	293
Cleveland	406	57	155	22	25	4	114	16	0	0	10	1	0	0	710
Cumbria	333	63	165	31	16	3	11	2	0	0	3	1	0	0	528
Derbyshire	374	59	196	31	26	4	7	1	0	0	34	5	0	0	637
Devon and Cornwall	796	46	631	36	194	11	120	7	0	0	2	0	0	0	1,743
Dorset	360	50	196	27	66	9	95	13	0	0	5	1	0	0	722
Durham	265	53	179	36	19	4	34	7	0	0	0	0	0	0	497
Dyfed-Powys	313	47	270	41	36	5	34	5	0	0	12	2	0	0	665
Essex	579	47	513	41	122	10	24	2	0	0	0	0	0	0	1,238
Gloucestershire	534	66	140	17	34	4	98	12	0	0	2	0	0	0	808
Greater Manchester	1,494	56	824	31	152	6	120	5	0	0	55	2	21	1	2,666
Gwent	119	19	372	61	81	13	42	7	0	0	0	0	0	0	614
Hampshire	668	39	907	53	130	8	18	1	0	0	3	0	0	0	1,726
Hertfordshire	615	45	503	37	175	13	51	4	0	0	26	2	0	0	1,370
Humberside	847	62	248	18	182	13	79	6	0	0	0	0	0	0	1,356
Kent	497	35	641	46	195	14	73	5	0	0	0	0	0	0	1,406
Lancashire	953	57	447	27	118	7	106	6	0	0	36	2	0	0	1,660
Leicestershire	648	50	461	36	98	8	73	6	0	0	5	0	0	0	1,285
Lincolnshire	531	66	188	24	47	6	33	4	0	0	0	0	0	0	799
Merseyside	507	36	702	49	38	3	129	9	0	0	44	3	0	0	1,420
Metropolitan	2,039	17	8,706	71	648	5	923	7	0	0	25	0	3	0	12,344
Norfolk	255	32	425	54	43	5	62	8	0	0	3	0	0	0	788
North Wales	349	41	373	44	91	11	34	4	0	0	1	0	0	0	848
North Yorkshire	437	75	82	14	14	2	52	9	0	0	0	0	0	0	585
Northamptonshire	622	66	267	28	23	2	11	1	0	0	18	2	0	0	941
Northumbria	448	25	1,011	56	116	6	202	11	0	0	34	2	0	0	1,811
Nottinghamshire	846	75	168	15	42	4	57	5	0	0	16	1	0	0	1,129
South Wales	158	20	479	61	44	6	52	7	0	0	47	6	0	0	780
South Yorkshire	421	54	185	24	38	5	115	15	0	0	20	3	0	0	779
Staffordshire	225	28	527	65	40	5	15	2	0	0	0	0	0	0	807
Suffolk	214	39	237	43	39	7	51	9	0	0	11	2	0	0	552
Surrey	842	52	618	38	51	3	82	5	0	0	24	1	0	0	1,617
Sussex	935	68	114	8	144	10	180	13	0	0	1	0	0	0	1,374
Thames Valley	1,456	71	379	19	50	2	151	7	1	0	5	0	0	0	2,042
Warwickshire	159	34	256	54	32	7	9	2	0	0	14	3	0	0	470
West Mercia	335	39	425	49	46	5	17	2	0	0	46	5	0	0	869
West Midlands	517	25	1,369	65	111	5	95	5	0	0	8	0	0	0	2,100
West Yorkshire	1,223	48	1,002	40	187	7	110	4	0	0	7	0	1	0	2,530
Wiltshire	445	54	297	36	25	3	47	6	0	0	13	2	0	0	827
Total	25,784	42	27,011	44	3,804	6	3,738	6	1	0	581	1	25	0	60,944

Table 9: Time taken to finalise allegations in 2017/18

Police force	Local resolution		Local investigation		Supervised investigation	
	Average number of days to finalise allegations	Number of allegations used in calculation*	Average number of days to finalise allegations	Number of allegations used in calculation*	Average number of days to finalise allegations	Number of allegations used in calculation*
Avon and Somerset	63	1,177	137	381	0	0
Bedfordshire	84	584	245	504	0	0
British Transport Police	29	55	104	468	0	0
Cambridgeshire	86	478	142	285	0	0
Cheshire	54	525	90	594	0	0
City of London	32	180	68	99	0	0
Cleveland	73	406	368	155	0	0
Cumbria	43	333	163	160	0	0
Derbyshire	61	374	96	196	0	0
Devon and Cornwall	69	795	200	611	0	0
Dorset	52	360	163	191	0	0
Durham	58	265	120	179	0	0
Dyfed-Powys	65	313	254	270	0	0
Essex	80	576	156	491	0	0
Gloucestershire	57	534	226	133	0	0
Greater Manchester	131	1,491	268	784	0	0
Gwent	24	115	129	362	0	0
Hampshire	78	668	143	899	0	0
Hertfordshire	84	615	169	483	0	0
Humberside	100	847	172	248	0	0
Kent	72	496	186	635	0	0
Lancashire	90	951	172	433	0	0
Leicestershire	57	646	172	453	0	0
Lincolnshire	67	531	163	187	0	0
Merseyside	55	506	208	670	0	0
Metropolitan	69	1,918	158	5,182	0	0
Norfolk	102	255	160	410	1,050	1
North Wales	65	349	163	369	0	0
North Yorkshire	99	437	313	82	0	0
Northamptonshire	54	621	260	258	0	0
Northumbria	47	448	141	1,004	0	0
Nottinghamshire	44	846	132	162	0	0
South Wales	62	158	142	465	0	0
South Yorkshire	65	420	198	162	0	0
Staffordshire	57	225	129	525	0	0
Suffolk	89	214	112	234	0	0
Surrey	77	842	171	618	0	0
Sussex	48	932	127	107	0	0
Thames Valley	75	1,456	212	365	0	0
Warwickshire	77	159	171	255	286	3
West Mercia	73	332	132	419	0	0
West Midlands	124	510	304	1,283	0	0
West Yorkshire	28	1,220	122	996	0	0
Wiltshire	79	444	182	297	0	0
Total	72	25,607	173	23,064	477	4

Table 10: Allegations finalised by investigation in 2017/18

Police force	Not subject to special requirements		Subject to special requirements*		Total investigated
	N	%	N	%	N
Avon and Somerset	281	71	113	29	394
Bedfordshire	479	95	26	5	505
British Transport Police	269	57	201	43	470
Cambridgeshire	269	94	18	6	287
Cheshire	580	97	18	3	598
City of London	96	97	3	3	99
Cleveland	148	95	7	5	155
Cumbria	159	96	6	4	165
Derbyshire	176	90	20	10	196
Devon and Cornwall	571	90	60	10	631
Dorset	170	87	26	13	196
Durham	158	88	21	12	179
Dyfed-Powys	260	96	10	4	270
Essex	464	90	49	10	513
Gloucestershire	100	71	40	29	140
Greater Manchester	555	67	269	33	824
Gwent	298	80	74	20	372
Hampshire	892	98	15	2	907
Hertfordshire	437	87	66	13	503
Humberside	243	98	5	2	248
Kent	608	95	33	5	641
Lancashire	424	95	23	5	447
Leicestershire	391	85	70	15	461
Lincolnshire	162	86	26	14	188
Merseyside	667	95	35	5	702
Metropolitan	7,571	87	1,135	13	8,706
Norfolk	401	94	24	6	425
North Wales	349	94	24	6	373
North Yorkshire	39	48	43	52	82
Northamptonshire	207	78	60	22	267
Northumbria	810	80	201	20	1,011
Nottinghamshire	147	88	21	13	168
South Wales	322	67	157	33	479
South Yorkshire	86	46	99	54	185
Staffordshire	439	83	88	17	527
Suffolk	229	97	8	3	237
Surrey	594	96	24	4	618
Sussex	77	68	37	32	114
Thames Valley	308	81	71	19	379
Warwickshire	222	87	34	13	256
West Mercia	356	84	69	16	425
West Midlands	1,114	81	255	19	1,369
West Yorkshire	974	97	28	3	1,002
Wiltshire	297	100	0	0	297
Total	23,399	87	3,612	13	27,011

*An investigation is subject to special requirements if it appears to the person investigating that there is an indication that a person to whose conduct the investigation relates may have:

1. committed a criminal offence, or
2. behaved in a manner that would justify the bringing of disciplinary proceedings.

Table 10a: Result of allegations finalised by investigation not subject to special requirements in 2017/18

Police force	Not upheld		Upheld		Total investigated not subject to special requirements*
	N	%	N	%	N
Avon and Somerset	248	88	33	12	281
Bedfordshire	449	94	30	6	479
British Transport Police	223	83	46	17	269
Cambridgeshire	247	92	22	8	269
Cheshire	473	82	107	18	580
City of London	76	79	20	21	96
Cleveland	126	85	22	15	148
Cumbria	140	88	19	12	159
Derbyshire	152	86	24	14	176
Devon and Cornwall	493	86	78	14	571
Dorset	158	93	12	7	170
Durham	141	89	17	11	158
Dyfed-Powys	208	80	52	20	260
Essex	403	87	61	13	464
Gloucestershire	95	95	5	5	100
Greater Manchester	524	94	31	6	555
Gwent	222	74	76	26	298
Hampshire	770	86	122	14	892
Hertfordshire	404	92	33	8	437
Humberside	220	91	23	9	243
Kent	454	75	154	25	608
Lancashire	399	94	25	6	424
Leicestershire	350	90	41	10	391
Lincolnshire	148	91	14	9	162
Merseyside	619	93	48	7	667
Metropolitan	6,707	89	864	11	7,571
Norfolk	352	88	49	12	401
North Wales	290	83	59	17	349
North Yorkshire	39	100	0	0	39
Northamptonshire	181	87	26	13	207
Northumbria	682	84	128	16	810
Nottinghamshire	135	92	12	8	147
South Wales	286	89	36	11	322
South Yorkshire	76	88	10	12	86
Staffordshire	364	83	75	17	439
Suffolk	208	91	21	9	229
Surrey	515	87	79	13	594
Sussex	70	91	7	9	77
Thames Valley	266	86	42	14	308
Warwickshire	173	78	49	22	222
West Mercia	278	78	78	22	356
West Midlands	955	86	159	14	1,114
West Yorkshire	826	85	148	15	974
Wiltshire	257	87	40	13	297
Total	20,402	87	2,997	13	23,399

*An investigation is subject to special requirements if it appears to the person investigating that there is an indication that a person to whose conduct the investigation relates may have:

1. committed a criminal offence, or
2. behaved in a manner that would justify the bringing of disciplinary proceedings.

Table 11: Nature of allegations finalised by investigation in 2017/18

Allegation groupings	Allegation category	Not subject to special requirements		Subject to special requirements*		Total investigated
		N	%	N	%	N
Oppressive behaviour	Serious non-sexual assault	136	59	95	41	231
	Sexual assault	60	70	26	30	86
	Other assault	2,246	76	719	24	2,965
	Oppressive conduct or harassment	1,332	87	194	13	1,526
	Unlawful/unnecessary arrest or detention	1,265	86	201	14	1,466
Malpractice	Irregularity in relation to evidence/perjury	500	79	134	21	634
	Corruption or malpractice	275	72	108	28	383
	Mishandling of property	689	86	111	14	800
Breach of PACE	Breach of Code A PACE on stop and search	152	78	44	22	196
	Breach of Code B PACE on searching of premises and seizure of property	459	89	54	11	513
	Breach of Code C PACE on detention, treatment and questioning	1,286	89	162	11	1,448
	Breach of Code D PACE on identification procedures	6	86	1	14	7
	Breach of Code E PACE on tape recording	9	82	2	18	11
	Unspecified breaches of PACE which cannot be allocated to a specific code	45	85	8	15	53
Lack of fairness and impartiality	Lack of fairness and impartiality	1,128	92	94	8	1,222
Discriminatory behaviour	Discriminatory behaviour	935	84	182	16	1,117
Other neglect of duty	Other neglect or Failure in duty	7,440	91	779	9	8,219
Incivility	Incivility, impoliteness and intolerance	2,111	88	292	12	2,403
Traffic	Traffic Irregularity	113	80	28	20	141
Other	Other irregularity in procedure	1,229	91	125	9	1,354
	Improper access and/or disclosure of information	610	83	127	17	737
	Other sexual conduct	20	56	16	44	36
	Other	875	89	110	11	985
Direction and control**	General policing standards	135	100			135
	Operational management decisions	50	100			50
	Operational policing policies	146	100			146
	Organisational decisions	147	100			147
Total allegations		23,399	87	3,612	13	27,011

*An investigation is subject to special requirements if it appears to the person investigating that there is an indication that a person to whose conduct the investigation relates may have:

1. committed a criminal offence, or
2. behaved in a manner that would justify the bringing of disciplinary proceedings.

**Direction and control matters are general decisions about how a police force is run, as opposed to the decisions or actions of people serving with the police.

Table 11a: Nature of allegations finalised by investigation not subject to special requirements in 2017/18

Allegation groupings	Allegation category	Not upheld		Upheld		Total investigated not subject to special requirements*
		N	%	N	%	N
Oppressive behaviour	Serious Non-sexual Assault	131	96	5	4	136
	Sexual assault	60	100	0	0	60
	Other assault	2,182	97	64	3	2,246
	Oppressive conduct or harassment	1,254	94	78	6	1,332
	Unlawful/unnecessary arrest or detention	1,173	93	92	7	1,265
Malpractice	Irregularity in relation to evidence/perjury	463	93	37	7	500
	Corruption or malpractice	268	97	7	3	275
	Mishandling of property	561	81	128	19	689
Breach of PACE	Breach of Code A PACE on stop and search	131	86	21	14	152
	Breach of Code B PACE on searching of premises and seizure of property	404	88	55	12	459
	Breach of Code C PACE on detention, treatment and questioning	1,106	86	180	14	1,286
	Breach of Code D PACE on identification procedures	6	100	0	0	6
	Breach of Code E PACE on tape recording	7	78	2	22	9
	Unspecified breaches of PACE which cannot be allocated to a specific code	37	82	8	18	45
Lack of fairness and impartiality	Lack of fairness and impartiality	1,020	90	108	10	1,128
Discriminatory behaviour	Discriminatory behaviour	897	96	38	4	935
Other neglect of duty	Other neglect or Failure in duty	6,002	81	1,438	19	7,440
Incivility	Incivility, impoliteness and intolerance	1,819	86	292	14	2,111
Traffic	Traffic Irregularity	100	88	13	12	113
Other	Other irregularity in procedure	1,071	87	158	13	1,229
	Improper access and/or disclosure of information	506	83	104	17	610
	Other sexual conduct	15	75	5	25	20
	Other	788	90	87	10	875
Direction and control**	General policing standards	96	71	39	29	135
	Operational management decisions	42	84	8	16	50
	Operational policing policies	140	96	6	4	146
	Organisational decisions	123	84	24	16	147
Total allegations		20,402	87	2,997	13	23,399

*An investigation is subject to special requirements if it appears to the person investigating that there is an indication that a person to whose conduct the investigation relates may have:

1. committed a criminal offence, or
2. behaved in a manner that would justify the bringing of disciplinary proceedings.

**Direction and control matters are general decisions about how a police force is run, as opposed to the decisions or actions of people serving with the police.

Table 12: Time taken to finalise complaint cases in 2017/18

Police force	Number of complaint cases finalised*	Average number of days to finalise complaint cases (NOT inc. suspension)	Average number of days to finalise complaint cases (inc. suspension)
Avon and Somerset	869	71	71
Bedfordshire	534	130	140
British Transport Police	292	88	101
Cambridgeshire	376	98	107
Cheshire	554	60	72
City of London	233	42	48
Cleveland	441	70	80
Cumbria	387	80	87
Derbyshire	385	95	95
Devon and Cornwall	803	224	230
Dorset	528	71	83
Durham	299	62	64
Dyfed-Powys	343	117	128
Essex	642	125	133
Gloucestershire	423	91	107
Greater Manchester	1,485	168	170
Gwent	261	95	107
Hampshire	986	82	84
Hertfordshire	553	109	121
Humberside	844	93	96
Kent	756	130	133
Lancashire	800	137	144
Leicestershire	590	108	110
Lincolnshire	556	99	105
Merseyside	518	104	119
Metropolitan	4,861	121	135
Norfolk	421	106	125
North Wales	449	100	106
North Yorkshire	284	105	110
Northamptonshire	472	97	106
Northumbria	767	98	105
Nottinghamshire	773	77	84
South Wales	608	117	124
South Yorkshire	489	106	122
Staffordshire	355	74	78
Suffolk	326	99	109
Surrey	456	99	104
Sussex	1,068	68	77
Thames Valley	1,430	93	102
Warwickshire	384	117	131
West Mercia	708	108	115
West Midlands	992	206	214
West Yorkshire	1,624	65	72
Wiltshire	556	75	82
Total	31,481	108	116

*The number of complaint cases presented in this table are only those with valid dates that are used in the calculation for the average number of days to finalise complaint cases.

Table 13: Appeals received and completed by chief officers in 2013/14 to 2017/18

Chief officer local resolution appeals	2013/14	2014/15	2015/16	2016/17	2017/18
Received	1,136	1,507	1,806	2,251	2,278
Valid completed	800	1,305	1,509	1,948	2,068
Upheld	168	214	256	328	321
% Upheld	21	16	17	17	16

Chief officer investigation appeals	2013/14	2014/15	2015/16	2016/17	2017/18
Received	1,642	1,898	1,521	1,204	922
Valid completed	1,240	1,563	1,356	1,103	1,039
Upheld	278	302	260	196	167
% Upheld	22	19	19	18	16

Chief officer disapplication appeals	2013/14	2014/15	2015/16	2016/17	2017/18
Received	350	409	402	404	365
Valid completed	262	340	392	351	344
Upheld	19	24	34	30	26
% Upheld	7	7	9	9	8

Chief officer discontinuance appeals	2013/14	2014/15	2015/16	2016/17	2017/18
Received	6	12	7	5	13
Valid completed	5	4	6	4	12
Upheld	1	1	2	2	0
% Upheld	20	25	33	50	0

Total chief officer appeals	2013/14	2014/15	2015/16	2016/17	2017/18
Received	3,134	3,826	3,736	3,864	3,578
Valid completed	2,307	3,212	3,263	3,406	3,463
Upheld	466	541	552	556	514
% Upheld	20	17	17	16	15

'Chief officers' refers to the heads of police forces (chief constables for all forces except the Metropolitan Police and City of London Police, which are each headed by a Commissioner). Under changes to the handling of appeals introduced by the *Police Reform and Social Responsibility Act 2011*, both chief officers and the IOPC consider appeals. Data for appeals dealt with by forces is only available from 2013/14. From January 2016, the British Transport Police consider appeals. Before this date all appeals relating to this force were considered by the IPCC (now the IOPC).

Some appeals may be deemed 'invalid' and these have been excluded from the number of 'valid completed' and the calculation for '% upheld'.

Completed appeals may have been received in a different financial year to that in which they are completed.

Table 14: Appeals received by chief officers in 2017/18

Police force	Chief officer local resolution appeals		Chief officer investigation appeals		Chief officer disapplication appeals		Chief officer discontinuance appeals		Total chief officer appeals
	N	%	N	%	N	%	N	%	N
Avon and Somerset	117	80	7	5	23	16	0	0	147
Bedfordshire	45	98	0	0	1	2	0	0	46
British Transport Police	7	32	15	68	0	0	0	0	22
Cambridgeshire	38	93	2	5	1	2	0	0	41
Cheshire	45	52	37	43	3	3	1	1	86
City of London	1	9	10	91	0	0	0	0	11
Cleveland	46	71	9	14	10	15	0	0	65
Cumbria	26	84	5	16	0	0	0	0	31
Derbyshire	42	82	6	12	2	4	1	2	51
Devon and Cornwall	44	49	37	41	9	10	0	0	90
Dorset	27	52	18	35	7	13	0	0	52
Durham	12	55	8	36	2	9	0	0	22
Dyfed-Powys	35	78	4	9	6	13	0	0	45
Essex	41	52	29	37	8	10	1	1	79
Gloucestershire	52	87	1	2	7	12	0	0	60
Greater Manchester	173	85	11	5	20	10	0	0	204
Gwent	7	19	29	78	1	3	0	0	37
Hampshire	46	42	61	55	3	3	0	0	110
Hertfordshire	48	94	1	2	2	4	0	0	51
Humberside	59	76	8	10	11	14	0	0	78
Kent	51	52	35	35	13	13	0	0	99
Lancashire	102	84	0	0	17	14	2	2	121
Leicestershire	48	84	0	0	9	16	0	0	57
Lincolnshire	34	67	9	18	8	16	0	0	51
Merseyside	76	72	18	17	11	10	1	1	106
Metropolitan	157	52	104	34	40	13	1	0	302
Norfolk	22	52	8	19	12	29	0	0	42
North Wales	16	31	30	58	6	12	0	0	52
North Yorkshire	38	93	2	5	1	2	0	0	41
Northamptonshire	74	94	0	0	5	6	0	0	79
Northumbria	29	24	69	58	18	15	4	3	120
Nottinghamshire	97	96	2	2	2	2	0	0	101
South Wales	7	7	81	80	13	13	0	0	101
South Yorkshire	34	77	3	7	7	16	0	0	44
Staffordshire	24	47	22	43	5	10	0	0	51
Suffolk	17	53	10	31	5	16	0	0	32
Surrey	60	71	17	20	8	9	0	0	85
Sussex	118	75	6	4	33	21	0	0	157
Thames Valley	128	78	28	17	9	5	0	0	165
Warwickshire	10	26	29	74	0	0	0	0	39
West Mercia	10	11	71	81	6	7	1	1	88
West Midlands	28	25	76	67	9	8	0	0	113
West Yorkshire	148	93	1	1	9	6	1	1	159
Wiltshire	39	87	3	7	3	7	0	0	45
Total	2,278	64	922	26	365	10	13	0	3,578

'Chief officers' refers to the heads of police forces (chief constables for all forces except the Metropolitan Police and City of London Police, which are each headed by a Commissioner). Under changes to the handling of appeals introduced by the *Police Reform and Social Responsibility Act 2011*, both chief officers and the IOPC consider appeals. Data for appeals dealt with by forces is only available from 2013/14. From January 2016, the British Transport Police consider appeals. Before this date all appeals relating to this force were considered by the IPCC (now the IOPC).

Table 15: Outcome of appeals completed by chief officers in 2017/18 (continues on next page)

Police force	Chief officer local resolution appeals			Chief officer investigation appeals			Chief officer disapplication appeals		
	Valid completed	Upheld	Upheld	Valid completed	Upheld	Upheld	Valid completed	Upheld	Upheld
	N	N	%	N	N	%	N	N	%
Avon and Somerset	104	22	21	7	0	0	19	1	5
Bedfordshire	40	6	15	0	0	-	1	0	0
British Transport Police	6	2	33	19	5	26	0	0	-
Cambridgeshire	48	4	8	0	0	-	1	0	0
Cheshire	44	9	20	32	2	6	2	0	0
City of London	1	0	0	8	1	13	0	0	-
Cleveland	46	5	11	9	1	11	9	0	0
Cumbria	24	6	25	7	1	14	2	1	50
Derbyshire	36	1	3	11	1	9	2	0	0
Devon and Cornwall	54	13	24	61	12	20	10	0	0
Dorset	14	2	14	20	1	5	9	3	33
Durham	10	1	10	6	0	0	3	0	0
Dyfed-Powys	30	3	10	4	0	0	4	0	0
Essex	33	4	12	30	8	27	8	1	13
Gloucestershire	56	2	4	0	0	-	5	0	0
Greater Manchester	199	21	11	9	0	0	32	1	3
Gwent	10	1	10	39	2	5	2	0	0
Hampshire	38	3	8	68	8	12	3	0	0
Hertfordshire	44	2	5	0	0	-	3	0	0
Humberside	49	2	4	8	1	13	11	2	18
Kent	42	4	10	29	3	10	12	0	0
Lancashire	36	5	14	0	0	-	9	0	0
Leicestershire	51	1	2	0	0	-	12	0	0
Lincolnshire	31	3	10	8	0	0	8	1	13
Merseyside	66	10	15	16	4	25	10	2	20
Metropolitan	179	70	39	246	67	27	43	4	9
Norfolk	23	2	9	10	3	30	11	2	18
North Wales	12	4	33	28	5	18	5	0	0
North Yorkshire	36	8	22	1	0	0	1	0	0
Northamptonshire	66	7	11	0	0	-	4	0	0
Northumbria	26	3	12	77	12	16	16	0	0
Nottinghamshire	81	11	14	1	0	0	2	0	0
South Wales	7	4	57	72	7	10	8	2	25
South Yorkshire	31	4	13	3	0	0	4	0	0
Staffordshire	25	9	36	30	4	13	5	0	0
Suffolk	20	7	35	11	1	9	4	0	0
Surrey	61	9	15	17	3	18	5	0	0
Sussex	95	10	11	4	1	25	32	2	6
Thames Valley	95	4	4	20	1	5	4	0	0
Warwickshire	7	0	0	19	0	0	0	0	-
West Mercia	8	0	0	51	0	0	3	0	0
West Midlands	14	5	36	55	12	22	8	1	13
West Yorkshire	140	24	17	0	0	-	8	2	25
Wiltshire	30	8	27	3	1	33	4	1	25
Total	2,068	321	16	1,039	167	16	344	26	8

Table 15: Outcome of appeals completed by chief officers in 2017/18 (continued)

Police force	Chief officer discontinuance appeals			Total chief officer appeals		
	Valid completed	Upheld	Upheld	Valid completed	Upheld	Upheld
	N	N	%	N	N	%
Avon and Somerset	0	0	-	130	23	18
Bedfordshire	0	0	-	41	6	15
British Transport Police	0	0	-	25	7	28
Cambridgeshire	0	0	-	49	4	8
Cheshire	1	0	0	79	11	14
City of London	0	0	-	9	1	11
Cleveland	0	0	-	64	6	9
Cumbria	0	0	-	33	8	24
Derbyshire	2	0	0	51	2	4
Devon and Cornwall	0	0	-	125	25	20
Dorset	0	0	-	43	6	14
Durham	0	0	-	19	1	5
Dyfed-Powys	0	0	-	38	3	8
Essex	1	0	0	72	13	18
Gloucestershire	0	0	-	61	2	3
Greater Manchester	0	0	-	240	22	9
Gwent	0	0	-	51	3	6
Hampshire	0	0	-	109	11	10
Hertfordshire	0	0	-	47	2	4
Humberside	0	0	-	68	5	7
Kent	0	0	-	83	7	8
Lancashire	1	0	0	46	5	11
Leicestershire	0	0	-	63	1	2
Lincolnshire	0	0	-	47	4	9
Merseyside	1	0	0	93	16	17
Metropolitan	1	0	0	469	141	30
Norfolk	0	0	-	44	7	16
North Wales	0	0	-	45	9	20
North Yorkshire	0	0	-	38	8	21
Northamptonshire	0	0	-	70	7	10
Northumbria	4	0	0	123	15	12
Nottinghamshire	0	0	-	84	11	13
South Wales	0	0	-	87	13	15
South Yorkshire	0	0	-	38	4	11
Staffordshire	0	0	-	60	13	22
Suffolk	0	0	-	35	8	23
Surrey	0	0	-	83	12	14
Sussex	0	0	-	131	13	10
Thames Valley	0	0	-	119	5	4
Warwickshire	0	0	-	26	0	0
West Mercia	1	0	0	63	0	0
West Midlands	0	0	-	77	18	23
West Yorkshire	0	0	-	148	26	18
Wiltshire	0	0	-	37	10	27
Total	12	0	0	3,463	514	15

Table 16: Appeals received and completed by the IOPC 2013/14 to 2017/18

IOPC non-recording appeals	2013/14	2014/15	2015/16	2016/17	2017/18
Received	1,503	1,696	1,529	1,693	1,554
Valid completed	1,252	1,333	1,188	1,497	1,445
Upheld	614	557	473	549	524
% Upheld	49	42	40	37	36
IOPC local resolution appeals	2013/14	2014/15	2015/16	2016/17	2017/18
Received	97	73	76	82	37
Valid completed	67	45	43	69	38
Upheld	43	29	35	52	24
% Upheld	64	64	81	75	63
IOPC investigation appeals	2013/14	2014/15	2015/16	2016/17	2017/18
Received	2,407	2,035	1,950	1,790	1,654
Valid completed	3,193	2,426	1,669	1,721	1,703
Upheld	1,412	951	687	694	643
% Upheld	44	39	41	40	38
IOPC disapplication appeals	2013/14	2014/15	2015/16	2016/17	2017/18
Received	65	110	116	128	117
Valid completed	51	97	96	130	101
Upheld	11	19	24	20	11
% Upheld	22	20	25	15	11
IOPC discontinuance appeals	2013/14	2014/15	2015/16	2016/17	2017/18
Received	7	9	10	7	3
Valid completed	1	1	3	6	3
Upheld	1	0	0	0	0
% Upheld	100	0	0	0	0
Total IOPC appeals	2013/14	2014/15	2015/16	2016/17	2017/18
Received	4,079	3,923	3,681	3,700	3,365
Valid completed	4,564	3,902	2,999	3,423	3,290
Upheld	2,081	1,556	1,219	1,315	1,202
% Upheld	46	40	41	38	37

This data is taken from the IOPC's internal case tracking management system.

Some appeals may be deemed 'invalid' and these have been excluded from the number of 'valid completed' and the calculation for '% upheld'.

Completed appeals may have been recorded in a different financial year to that in which they are completed.

Table 17: Appeals received by the IOPC in 2017/18

Police force	IOPC non-recording appeals		IOPC local resolution appeals		IOPC investigation appeals		IOPC disapplication appeals		IOPC discontinuance appeals		Total IOPC appeals
	N	%	N	%	N	%	N	%	N	%	N
Avon and Somerset	31	60	0	0	21	40	0	0	0	0	52
Bedfordshire	24	33	0	0	47	64	2	3	0	0	73
British Transport Police	5	29	0	0	12	71	0	0	0	0	17
Cambridgeshire	20	43	1	2	25	53	1	2	0	0	47
Cheshire	23	79	0	0	6	21	0	0	0	0	29
City of London	11	100	0	0	0	0	0	0	0	0	11
Cleveland	8	57	0	0	5	36	1	7	0	0	14
Cumbria	21	53	0	0	19	48	0	0	0	0	40
Derbyshire	27	68	0	0	13	33	0	0	0	0	40
Devon and Cornwall	72	79	1	1	18	20	0	0	0	0	91
Dorset	7	54	1	8	4	31	1	8	0	0	13
Durham	28	68	1	2	10	24	2	5	0	0	41
Dyfed-Powys	27	52	1	2	24	46	0	0	0	0	52
Essex	44	62	0	0	27	38	0	0	0	0	71
Gloucestershire	6	38	0	0	10	63	0	0	0	0	16
Greater Manchester	47	47	0	0	53	52	1	1	0	0	101
Gwent	12	57	0	0	9	43	0	0	0	0	21
Hampshire	33	56	1	2	25	42	0	0	0	0	59
Hertfordshire	36	47	2	3	38	49	1	1	0	0	77
Humberside	58	69	3	4	21	25	2	2	0	0	84
Kent	44	58	1	1	31	41	0	0	0	0	76
Lancashire	47	41	1	1	59	51	9	8	0	0	116
Leicestershire	21	44	0	0	21	44	6	13	0	0	48
Lincolnshire	18	67	0	0	9	33	0	0	0	0	27
Merseyside	46	55	2	2	34	40	2	2	0	0	84
Metropolitan	246	26	8	1	621	65	74	8	1	0	950
Norfolk	79	61	3	2	41	32	6	5	0	0	129
North Wales	17	55	0	0	13	42	1	3	0	0	31
North Yorkshire	19	73	0	0	7	27	0	0	0	0	26
Northamptonshire	14	35	1	3	25	63	0	0	0	0	40
Northumbria	69	63	0	0	40	37	0	0	0	0	109
Nottinghamshire	23	53	0	0	20	47	0	0	0	0	43
South Wales	19	26	0	0	51	71	0	0	2	3	72
South Yorkshire	26	51	0	0	25	49	0	0	0	0	51
Staffordshire	25	57	0	0	19	43	0	0	0	0	44
Suffolk	35	67	2	4	13	25	2	4	0	0	52
Surrey	24	49	2	4	22	45	1	2	0	0	49
Sussex	17	63	0	0	10	37	0	0	0	0	27
Thames Valley	44	67	0	0	22	33	0	0	0	0	66
Warwickshire	11	58	0	0	8	42	0	0	0	0	19
West Mercia	13	50	0	0	12	46	1	4	0	0	26
West Midlands	75	71	0	0	30	29	0	0	0	0	105
West Yorkshire	54	30	6	3	117	65	3	2	0	0	180
Wiltshire	28	61	0	0	17	37	1	2	0	0	46
Total	1,554	46	37	1	1,654	49	117	3	3	0	3,365

Table 18: Outcome of appeals completed by the IOPC in 2017/18 (continues on next page)

Police force	IOPC non-recording appeals			IOPC local resolution appeals			IOPC investigation appeals		
	Valid completed	Upheld	Upheld	Valid completed	Upheld		Valid completed	Upheld	Upheld
	N	N	%	N	N	%	N	N	%
Avon and Somerset	27	7	26	0	0	-	26	10	38
Bedfordshire	21	5	24	0	0	-	48	13	27
British Transport Police	3	2	67	0	0	-	15	7	47
Cambridgeshire	18	4	22	0	0	-	23	9	39
Cheshire	19	4	21	0	0	-	5	2	40
City of London	11	2	18	0	0	-	1	0	0
Cleveland	8	1	13	0	0	-	5	3	60
Cumbria	15	10	67	0	0	-	20	5	25
Derbyshire	22	13	59	0	0	-	12	5	42
Devon and Cornwall	60	21	35	1	1	100	20	7	35
Dorset	7	4	57	0	0	-	4	2	50
Durham	23	6	26	0	0	-	13	3	23
Dyfed-Powys	23	11	48	1	1	100	23	5	22
Essex	42	11	26	0	0	-	30	11	37
Gloucestershire	5	1	20	0	0	-	16	5	31
Greater Manchester	55	19	35	0	0	-	58	26	45
Gwent	10	6	60	0	0	-	7	1	14
Hampshire	31	12	39	0	0	-	30	5	17
Hertfordshire	37	15	41	2	1	50	37	7	19
Humberside	56	15	27	4	3	75	23	12	52
Kent	38	13	34	1	1	100	31	12	39
Lancashire	40	13	33	2	2	100	52	27	52
Leicestershire	19	6	32	0	0	-	24	5	21
Lincolnshire	18	4	22	0	0	-	10	2	20
Merseyside	44	14	32	2	1	50	29	7	24
Metropolitan	229	78	34	8	5	63	647	238	37
Norfolk	72	17	24	4	2	50	40	20	50
North Wales	12	6	50	0	0	-	12	2	17
North Yorkshire	24	19	79	2	2	100	8	5	63
Northamptonshire	11	6	55	1	0	0	23	8	35
Northumbria	65	22	34	0	0	-	39	9	23
Nottinghamshire	24	10	42	0	0	-	16	7	44
South Wales	25	12	48	0	0	-	58	34	59
South Yorkshire	22	5	23	0	0	-	26	10	38
Staffordshire	23	7	30	0	0	-	16	8	50
Suffolk	32	7	22	2	1	50	13	4	31
Surrey	22	11	50	2	1	50	24	8	33
Sussex	15	6	40	0	0	-	6	2	33
Thames Valley	43	20	47	0	0	-	20	12	60
Warwickshire	12	7	58	0	0	-	8	3	38
West Mercia	11	7	64	0	0	-	12	7	58
West Midlands	69	36	52	0	0	-	33	16	48
West Yorkshire	56	17	30	6	3	50	119	50	42
Wiltshire	26	12	46	0	0	-	21	9	43
Total	1,445	524	36	38	24	63	1,703	643	38

This data is taken from the IOPC's internal case tracking management system. **Page 91**

Some appeals may be deemed 'invalid' and these are excluded from the number of 'valid completed' and the calculation for '% upheld'.

Some caution is advised when looking at appeals upheld by police force due to the sometimes small number of appeals involved.

Table 18: Outcome of appeals completed by the IOPC in 2017/18 (continued)

Police force	IOPC disapplication appeals			IOPC discontinuance appeals			Total IOPC appeals		
	Valid completed	Upheld	Upheld	Valid completed	Upheld	Upheld	Valid completed	Upheld	Upheld
	N	N	%	N	N	%	N	N	%
Avon and Somerset	1	0	0	0	0	-	54	17	31
Bedfordshire	1	0	0	0	0	-	70	18	26
British Transport Police	0	0	-	0	0	-	18	9	50
Cambridgeshire	1	0	0	0	0	-	42	13	31
Cheshire	0	0	-	0	0	-	24	6	25
City of London	0	0	-	0	0	-	12	2	17
Cleveland	1	0	0	0	0	-	14	4	29
Cumbria	0	0	-	0	0	-	35	15	43
Derbyshire	0	0	-	0	0	-	34	18	53
Devon and Cornwall	0	0	-	0	0	-	81	29	36
Dorset	1	0	0	0	0	-	12	6	50
Durham	2	0	0	0	0	-	38	9	24
Dyfed-Powys	0	0	-	0	0	-	47	17	36
Essex	0	0	-	0	0	-	72	22	31
Gloucestershire	0	0	-	0	0	-	21	6	29
Greater Manchester	1	1	100	0	0	-	114	46	40
Gwent	0	0	-	0	0	-	17	7	41
Hampshire	0	0	-	0	0	-	61	17	28
Hertfordshire	0	0	-	0	0	-	76	23	30
Humberside	2	0	0	0	0	-	85	30	35
Kent	0	0	-	0	0	-	70	26	37
Lancashire	9	5	56	0	0	-	103	47	46
Leicestershire	5	2	40	0	0	-	48	13	27
Lincolnshire	0	0	-	0	0	-	28	6	21
Merseyside	2	0	0	0	0	-	77	22	29
Metropolitan	59	2	3	1	0	0	944	323	34
Norfolk	7	0	0	0	0	-	123	39	32
North Wales	1	0	0	0	0	-	25	8	32
North Yorkshire	0	0	-	0	0	-	34	26	76
Northamptonshire	0	0	-	0	0	-	35	14	40
Northumbria	0	0	-	0	0	-	104	31	30
Nottinghamshire	0	0	-	0	0	-	40	17	43
South Wales	0	0	-	2	0	0	85	46	54
South Yorkshire	0	0	-	0	0	-	48	15	31
Staffordshire	0	0	-	0	0	-	39	15	38
Suffolk	2	0	0	0	0	-	49	12	24
Surrey	1	0	0	0	0	-	49	20	41
Sussex	0	0	-	0	0	-	21	8	38
Thames Valley	0	0	-	0	0	-	63	32	51
Warwickshire	0	0	-	0	0	-	20	10	50
West Mercia	1	0	0	0	0	-	24	14	58
West Midlands	0	0	-	0	0	-	102	52	51
West Yorkshire	3	0	0	0	0	-	184	70	38
Wiltshire	1	1	100	0	0	-	48	22	46
Total	101	11	11	3	0	0	3,290	1,202	37

This data is taken from the IOPC's internal case tracking management system.

Some appeals may be deemed 'invalid' and these are excluded from the number of 'valid completed' and the calculation for '% upheld'.

Some caution is advised when looking at appeals upheld by police force due to the sometimes small number of appeals involved.

Table 19: Gender of complainants 2017/18

Gender	2016/17		2017/18		Percentage change from 2016/17
	N	%	N	%	
Female	13,127	38	12,286	39	1%
Male	20,724	60	18,956	60	0%
Other	113	0	95	0	0%
Prefer not to say	0	0	0	0	0%
Unknown	322	1	382	1	0%
Total	34,286	100	31,719	100	

Table 20: Ethnicity of complainants 2017/18

Ethnicity	2016/17		2017/18		Percentage change from 2016/17
	N	%	N	%	
White	16,751	49	14,516	46	-3%
Asian	1,672	5	1,438	5	0%
Black	1,482	4	1,320	4	0%
Other	791	2	720	2	0%
Not stated	12,552	37	12,507	39	2%
Unknown	1,038	3	1,218	4	1%
Total	34,286	100	31,719	100	

Table 21: Age of complainants 2017/18

Age group	2016/17		2017/18		Percentage change from 2016/17
	N	%	N	%	
17 & below	263	1	257	1	0%
18-29	4,759	14	4,045	13	-1%
30-39	6,198	18	5,839	18	0%
40-49	6,385	19	5,760	18	-1%
50-59	5,110	15	4,912	15	0%
60+	3,018	9	3,034	10	1%
Unknown	8,553	25	7,872	25	0%
Total	34,286	100	31,719	100	

The age of complainants is calculated from their birth date to the date force data is recorded onto the IOPC system.

Table 22: Status of those subject to a complaint 2017/18

Status	N	%
Police officer ranks	30,406	87
Police staff including traffic wardens	3,200	9
Community support officers	923	3
Contracted staff	148	0
Special constables	403	1
Total	35,080	100

The total number of subjects in table 22 will not match the figures in tables 23 and 24. This is because people subject to more than one complaint in the year may have held different ranks at the time each allegation was recorded. In such cases they will be counted more than once in this table (for each rank) but not in the following tables.

Table 23: Gender of those subject to a complaint 2017/18

Gender	N	%
Female	10,028	29
Male	24,682	71
Other	13	0
Unknown	190	1
Total	34,913	100

Table 24: Ethnicity of those subject to complaint 2017/18

Ethnicity	N	%
White	29,261	84
Asian	1,000	3
Black	568	2
Other	655	2
Not stated	853	2
Unknown	2,576	7
Total	34,913	100

Tables 23 and 24: Subjects are only counted once in these tables, regardless of how many complaints they have been subject to in the year.

5

Annex A: glossary of terms

The following terms are listed in the order they appear in the text of this report, which follows the process by which a complaint may be handled.

Complaint case: A single complaint case may have one or more allegations attached to it, made by one or more complainants, against one or more persons serving with the police.

Allegation: An allegation may concern the conduct of a person or persons serving with the police or the direction and control of a police force. It is made by someone defined as a complainant under the *Police Reform Act 2002* (see ‘complainant’ below). An allegation may be made by one or more complainants. A complaint case may contain one or many allegations. For example, a person may allege that they were pushed by an officer and that the officer was rude to them. This would be recorded as two separate allegations forming one complaint case. An allegation is recorded against an allegation category¹⁶.

Direction and control: The IOPC considers the term ‘direction and control’ to mean

general decisions about how a police force is run, as opposed to the day-to-day decisions or actions of people serving with the police, which affect individual members of the public – including those that affect more than one individual.

Local resolution: For less serious complaints, such as rudeness or incivility, the complaint may be dealt with by local resolution. Local resolution is a flexible process that can be adapted to the needs of the complainant. A local police supervisor deals with the complaint, which might involve providing an explanation or information; an apology on behalf of the force; a written explanation of the circumstances and any action taken; or resolving the complaint over the counter or by telephone.

Investigation: If a complaint is not suitable for local resolution, it must be investigated. This involves the appointment of an investigating officer who will investigate the complaint and produce a report detailing the findings about each allegation and any action to be taken as a result of the investigation. Two different types

¹⁶ A full list of the allegation categories and their definitions can be found in the IOPC’s guidance on the recording of complaints under the *Police Reform Act 2002*: www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

of investigation are referred to in this report:

- local investigations: carried out entirely by the police. Complainants have a right of appeal to the relevant appeal body following a local investigation¹⁷.
- supervised investigations: carried out by the police under their own direction and control. The IOPC sets out what the investigation should look at (which is referred to as the investigation's 'terms of reference') and will receive the investigation report when it is complete. Complainants have a right of appeal to the IOPC following a supervised investigation.

Disapplication: Disapplication applies only to allegations linked to complaint cases received on or after 22 November 2012, except for British Transport Police.

There are certain circumstances in which a complaint that has been recorded by a police force does not have to be dealt under the *Police Reform Act 2002*.

These are:

- if more than 12 months have passed between the incident, or the latest incident, giving rise to the complaint and the making of the complaint and either no good reason for the delay has been shown or injustice would be likely to be caused by the delay
- if the matter is already subject of a complaint made by or on behalf of the same complainant
- if the complainant discloses neither their

name and address nor that of any other interested person and it is not reasonably practicable to ascertain these

- if the complaint is repetitious
- if the complaint is vexatious, oppressive or otherwise an abuse of the procedures for dealing with complaints
- if it is not reasonably practicable to complete the investigation or any other procedures under the *Police Reform Act 2002*

If the complaint did not meet the criteria for referral to the IOPC, the police force can carry out a disapplication. If the complaint was referred to the IOPC and the IOPC either referred the complaint back to the force or determined the form of investigation, the force must apply to the IOPC for permission to carry out the disapplication.

Dispensation: Dispensation applies only to allegations linked to complaint cases recorded by British Transport Police or, for the other forces, complaints cases received before 22 November 2012.

There are certain circumstances in which a complaint that has been recorded by a police force does not have to be dealt under the *Police Reform Act 2002*.

These are:

- if more than 12 months have passed between the incident, or the latest incident, giving rise to the complaint and the making of the complaint and either no good reason for the delay has been shown or injustice

¹⁷ The test to determine who should deal with an appeal is set out in section 13 of our Statutory Guidance (2015) www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance 'Chief officer' is a collective term that refers to the heads of police forces (this means chief constables for all forces except the Metropolitan Police Service and the City of London Police, which are each headed by a commissioner).

- would be likely to be caused by the delay
- if the matter is already subject of a complaint made by the same complainant
- if the complainant discloses neither their name and address nor that of any other interested person and it is not reasonably practicable to ascertain these
- if the complaint is repetitious
- if the complaint is vexatious, oppressive or otherwise an abuse of the procedures for dealing with complaints
- if it is not reasonably practicable to investigate the complaint

Discontinuance: A discontinuance ends an ongoing investigation into a complaint. It can only occur if certain circumstances apply:

- if a complainant refuses to co-operate to the extent it is not reasonably practicable to continue with the investigation
- if the police force decides the complaint is suitable for local resolution
- if the complaint is repetitious
- if the complaint is vexatious, oppressive or otherwise an abuse of the procedures for dealing with complaints
- if it is not reasonably practicable to proceed with the investigation

If the complaint did not meet the criteria for referral to the IOPC, the police force can discontinue a local investigation. Otherwise, it must apply to the IOPC for permission to discontinue the investigation. In the case of a supervised investigation, the police force must apply to the IOPC for permission to discontinue the investigation.

Withdrawn: A complainant may decide to withdraw one or more allegations in their complaint or they may wish no further action to be taken in relation to their allegation/complaint. In this case, no further action may be taken on the allegation/complaint.

Special requirements: If an investigation is subject to special requirements:

- a severity assessment of the level of misconduct must be carried out
- notices of investigation must be served on subjects of the complaint
- there are formal procedures for the investigation that must be complied with
- the investigation must consider whether there is a case to answer at its conclusion

Upheld: A complaint is upheld if, on the balance of probabilities, the force considers that the service received was below the standard that a person could reasonably expect.

Suspension: After recording a complaint, the investigation or other procedure for dealing with the complaint may be suspended. This is because continuing the investigation or other procedure would prejudice a criminal investigation or criminal proceedings.

There are a number of factors police forces should consider when deciding whether it is appropriate to suspend an investigation into a complaint¹⁸. They must notify the complainant in writing when the investigation or other procedure into their complaint is suspended and provide an explanation for the decision.

¹⁸ Information about the considerations that should be made when deciding whether to suspend an investigation or other procedures into a complaint can be found in section 9 of our Statutory Guidance (15) www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

A complainant has the right to ask the IOPC to review that decision.

Chief officer: ‘Chief officer’ is a collective term that refers to the heads of police forces (this means chief constables for all forces except the Metropolitan Police Service and the City of London Police, which are each headed by a commissioner).

Non-recording appeal: Under the *Police Reform Act 2002*, the police have a duty to record all complaints about the conduct of a serving member of the police or the direction and control of a police force. Complainants have the right to appeal to the IOPC in relation to the non-recording of their complaint on a number of grounds. These are set out in the ‘Findings’ section of this report. The appeal right in relation to direction and control complaints is limited; full details can be found in Section 13 of our Statutory Guidance (2015).

Investigation appeal: This applies to all complaints investigated by the police force itself or where the investigation has been supervised by the IOPC. The complainant may appeal to the relevant appeal body on a number of grounds in relation to the investigation. These are set out in the ‘Findings’ section of this report. There is no right of appeal in relation to the investigation of a direction and control complaint.

Local resolution appeal: Complainants are entitled to appeal to the relevant appeal body against the outcome of local resolution. There is no right of appeal when the complaint that was locally resolved relates to direction and control.

An appeal may be made to the relevant appeal body against the decision to disapply the requirements of the *Police Reform Act 2002*. There is no right of appeal where the complaint subject to the disapplication relates to direction and control or where the IOPC has given permission for the disapplication.

Discontinuance appeal: An appeal may be made to the relevant appeal body against the decision by a police force to discontinue the investigation into a complaint. There is no right of appeal when:

- the complaint subject to the discontinued investigation relates to direction and control
- the IOPC has given permission for the discontinuance
- the discontinuance is carried out by the IOPC in relation to a supervised investigation

Invalid appeals: There are a number of reasons why an appeal may be judged to be invalid. These are:

- if the appeal is not complete. An appeal must be in writing and contain certain information, such as the details of the complaint, the name of the police force that has made the decision is the subject of the appeal and the grounds of appeal. The relevant appeal body may still consider an appeal even if it does not consider the appeal complete.
- if there is no right of appeal. Only a complainant or someone acting on their behalf can make an appeal. If anyone else tries to, the appeal is invalid. An appeal must also follow the final decision of a police force in relation to a complaint (or, in the case of non-recording where no decision has been

made, at least 15 working days must have passed between the complainant making their complaint and submitting an appeal against the non-recording of that complaint).

- if the appeal is made more than 28 days after the date of the letter from the police force notifying the complainant about the decision (which can be appealed) and there are no special circumstances to justify the delay

The right of appeal in relation to direction and control complaints is limited, as noted in the definition for each appeal type above. Full details can be found in Section 13 of our Statutory Guidance (2015).

Complainants: Under the *Police Reform Act 2002*, a complaint may be made by:

- a member of the public who claims that the conduct took place in relation to them
- a member of the public who claims they have been 'adversely affected' by the conduct, even though it did not take place in relation to them
- a member of the public who claims to have witnessed the conduct
- a person acting on behalf of someone who falls within any of the three categories above. This person would be classed as an 'agent' or 'representative' and must have the written permission of the complainant to act on their behalf

A person is 'adversely affected' if they:

- suffer distress or inconvenience
- loss or damage
- are put in danger or at risk by the conduct complained about

This might apply, for example, to other people present at the incident, or to the parent of a child or young person, or a friend of the person directly affected. It does not include someone distressed by watching an incident on television.

A 'witness' is defined as someone who gained their knowledge of that conduct in a way that would make them a competent witness capable of giving admissible evidence of that conduct in criminal proceedings, or has anything in their possession or control that would be admissible evidence in criminal proceedings.

One complaint case can have multiple complainants attached to it, and one individual can make more than one complaint within the reporting year.

Subjects: Under the *Police Reform Act 2002*, complaints can be made about persons serving with the police as follows:

- police officers of any rank
- police staff, including community support officers and traffic wardens
- special constables

Complaints can also be made about contracted staff who are designated under section 39 of the *Police Reform Act 2002* as a detention officer or escort officer by a chief officer.

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