



Professional Standards and Integrity Committee of the Police Authority Board

Date: MONDAY, 2 MARCH 2020

Time: 1.45 pm

Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members: Alderman Alison Gowman (Chairman)
Caroline Addy
Douglas Barrow (Ex-Officio Member)
Nicholas Bensted-Smith
Tijs Broeke
Mia Campbell
Alderman Emma Edhem
Deborah Oliver
Deputy James Thomson (Ex-Officio Member)
James Tumbridge

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

Lunch will be served in the Guildhall Club at 1pm

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

**John Barradell
Town Clerk and Chief Executive**

AGENDA

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES**

To agree the public minutes and non-public summary of the meeting held on 29 November 2019.

For Decision
(Pages 1 - 6)

4. **REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 7 - 8)

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

Report of the Commissioner.

For Information
(Pages 9 - 14)

a) **Appendix A - Integrity Dashboard 2019/20 Q3** (Pages 15 - 24)

b) **Appendix B - Police Integrity Development and Delivery Plan Report 2019/20** (Pages 25 - 34)

c) **Appendix C - Peer review report for the City of London Police** (Pages 35 - 50)

6. **IOPC POLICE COMPLAINTS STATISTICS FOR ENGLAND AND WALES 2018/19**

Report of the Independent Office for Police Conduct.

For Information
(Pages 51 - 104)

7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

8. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**

9. **EXCLUSION OF THE PUBLIC**
MOTION – that under Section 100 (A) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.
- For Decision**
10. **NON-PUBLIC MINUTES**
To agree the non-public minutes of the meeting held on 29 November 2019.
- For Decision**
(Pages 105 - 110)
11. **NON-PUBLIC REFERENCES**
Joint report of the Town Clerk and Commissioner.
- For Information**
(Pages 111 - 112)
12. **EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES**
Report of the Comptroller and City Solicitor.
- For Information**
(Pages 113 - 124)
13. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 3 1 OCTOBER 2019 – 31 DECEMBER 2019**
Report of the Commissioner.
- For Information**
(Pages 125 - 160)
14. **PROFESSIONAL STANDARDS DIRECTORATE - SUMMARY OF CASES**
- For Information**
(Pages 161 - 164)
- a) **Case to Answer** (Pages 165 - 166)
- b) **No Case to Answer** (Pages 167 - 178)
- c) **Local Resolution** (Pages 179 - 210)
15. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
16. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

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**PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE OF THE POLICE
AUTHORITY BOARD
Friday, 29 November 2019**

Minutes of the meeting of the Professional Standards and Integrity Committee of the Police Authority Board held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Friday, 29 November 2019 at 11.00 am

Present

Members:

Alderman Alison Gowman (Chair)
Caroline Addy
Nicholas Bensted-Smith
Tijs Broeke
Mia Campbell
Alderman Emma Edhem
Deborah Oliver
James Tumbridge

City of London Police Authority:

| | |
|--------------------|---|
| Simon Latham | - Deputy Chief Executive |
| Oliver Bolton | - Deputy Head of Police Authority Team |
| Alistair MacLellan | - Town Clerk's Department |
| Rachael Waldron | - Town Clerk's Department |
| Tarjinder Phull | - Comptroller and City Solicitor's Department |

City of London Police Force:

| | |
|---------------------|----------------------------------|
| Alistair Sutherland | - Assistant Commissioner |
| Angie Rogers | - Head of Professional Standards |
| Stuart Phoenix | - Head of Strategic Development |

1. APOLOGIES

Apologies were received from Doug Barrow and Deputy James Thomson.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

Deborah Oliver noted an interest in Item 20 (Employment Tribunal and Other Cases) as her employer was the British Medical Association. James Tumbridge noted in relation to Item 20 that he sat on Police tribunals outside the City of London area.

3. MINUTES

RESOLVED, that the public minutes and summary of the meeting held on 18 September 2019 be approved.

4. PUBLIC REFERENCES

Members considered a joint report of the Commissioner and the Town Clerk regarding public references and the following points were made.

8/2019/P – Reference to Stop and Search in Force Communications Plan

- The Assistant Commissioner noted that the Annual Report on Stop and Search considered by the Police Authority Board would be circulated to Members of the Committee outside of the meeting, and the reference closed prior to March 2020.

12/2019/P – Predictive Policing Methods

- The Assistant Commissioner noted that a report on this issue would be submitted to the next meeting.

13/2019/P – Communication of Anti-Corruption Measures

- The Head of the Professional Standards noted that further communications activity was planned and that this reference would be closed prior to the next meeting.

RESOLVED, that the report be received.

5. POLICE AUTHORITY PROCESS FOR HANDLING THE COMPLAINTS APPEALS PROCESS

Members considered a report of the Town Clerk regarding the Police Authority process for handling Complaints Appeals and the following points were made.

- Members welcomed the options presented within the report but felt that it would be more efficient to adopt a model whereby the entire membership of the Committee formed a pool from which a Review Panel could be convened.
- The Chair noted that the new process should be reviewed after three months of operation to ensure it was working effectively **(17/2019/P)**. Members should also be offered relevant training.
- The Chair concluded by noting that the authority to make a determination should lie with the Review Panel.

RESOLVED, that Members

- Approve that a Review Panel be established as and when required, consisting of the Chair and two other Members of the Committee, or any three Members of the Committee in the event the Chair being unavailable.
- Approve that authority to make a determination lie with the Review Panel by majority decision.

6. **PUBLIC COMMITTEE REPORT CPS FILE FAILURES**

Members considered a report of the Commissioner regarding Crown Prosecution Service File Failures and the following points were made.

- The Head of Professional Standards noted that CPS file failure was a national issue and individual cases were often down to factors such as not submitting CCTV evidence in good time, which had now been rectified. Moreover, a small number of cases could seem disproportionately high when viewed in percentage terms.
- In response to a question, the Head of Professional Standards noted that failure was defined as a missed target rather than a prosecution being abandoned. She committed to confirming how many prosecutions were abandoned due to file failures outside of the meeting **(18/2019/P)**.
- In response to a question, the Head of Professional Standards replied that 'real time' expert advice from the Evidence Review Officer (ERO) in the Uniform Policing Directorate involved the ERO sitting with officers on request to provide advice and guidance on file preparation.
- Members queried whether Extinction Rebellion policing commitments were the reason for the increase in file failures for the month of September 2019.
- In response to a question, the Head of Professional Standards replied that Transform would come into effect from April 2020.
- Members requested that a further report on file failures be prepared for the Committee which included a definition on what constituted a file failure and an analysis of the impact of file failures **(19/2019/P)**.

RESOLVED, that the report be received.

7. **FORCE RESPONSE TO HMICFRS REPORT: PEEL SPOTLIGHT REPORT, SHINING A LIGHT ON BETRAYAL (ABUSE OF POSITION FOR SEXUAL PURPOSE)**

Members considered a report of the Commissioner regarding the Force response to the HMICFRS PEEL spotlight report *Shining a Light on Betrayal* (Abuse of Position for Sexual Purpose) and the following points were made.

- The Head of Strategic Development noted that the report detailed progress on issues highlighted by the 2017 PEEL spotlight report. This included work around counter-corruption capacity and the proper use of software and effective vetting.
- In response to a question, the Head of Strategic Development noted that corruption intelligence not being recorded correctly was commonly due to insufficient training in the proper use of software rather than any other factor.

RESOLVED, that the report be received.

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

Members considered an update report of the Commissioner regarding the Integrity Dashboard and the Code of Ethics and the following points were made.

Integrity Dashboard 2019/20 Q2

- The Chair commented that much of the data within the dashboard related to historic cases and this should be clarified in future iterations of the dashboard. Moreover, indicators should be given more clarity on how they related to ethics **(20/2019/P)**.
- In response to a question, the Head of Strategic Development confirmed that the data regarding Learning and Development indicators was satisfactory and that percentage data would be clarified in future reports **(20/2019/P)**.
- In response to a question, the Head of Professional Standards noted that the 15 officers trained in Stop and Search represented new arrivals to the Force.
- The Assistant Commissioner confirmed that it was possible for officers to fail courses.
- The Head of Strategic Development noted that random drug testing had recently been transferred from Learning & Development to the Professional Standards Directorate and completed.

Police Integrity Development and Delivery Plan Report 2019/20 – November 2019 Update

- In response to a question, the Head of Strategic Development noted that peer review results were forthcoming that would inform the Force's decision on whether to take part in the 'Ethical Drift' survey.
- In response to a question, the Head of Strategic Development noted that peer review of organisational integrity arrangements was part of an ongoing network offer.

RESOLVED, that the report be received.

8.1 **Integrity Dashboard 2019/20 Q2**

RESOLVED, that the Integrity Dashboard 2019/20 Q2 be received.

**8.2 Police Integrity Development and Delivery Plan Report 2019/20
November 2019 Update**

RESOLVED, that the Police Integrity Development and Delivery Plan Report 2019/20 – November 2019 be received.

9. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE

There were no questions.

10. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT

There was one item of other business.

10.1 Ethical Economic Partnerships Policy

Members considered a joint report of the Commissioner and the Chief Executive regarding an Ethical Economic Partnerships Policy. The Chair welcomed the report and noted that the Committee would review the policy in a year's time (**21/2019/P**).

RESOLVED, that the report be received.

11. 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 of business on the grounds they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Act.

12. NON-PUBLIC MINUTES

RESOLVED, that the non-public minutes of the meeting held on 18 September 2019 be approved as a correct record.

12.1 Non-Public Matter Arising

Members considered a non-public matter arising from a previous meeting.

12.2 Non-Public Reference 10

Members agreed to vary the order of items on the agenda so that Item 13(a) – Non-Public Reference 10 was considered next.

13. NON-PUBLIC REFERENCES

14. EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES

Members agreed to vary the order of items on the agenda so that Item 14 (Employment Tribunal and other Legal Cases) was considered next.

14.1 11/2019/P - Review of Speed Camera Activations

Members considered Item 13(b) – Review of Speed Camera Activations next.

15. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 2 – 1 JULY 2019 – 30 SEPTEMBER 2019**
Members considered a report of the Commissioner regarding Professional Standards Statistics – Quarter 2 – 1 July 2019 – 30 September 2019.
16. **PROFESSIONAL STANDARDS DIRECTORATE - SUMMARY OF CASES**
Members considered a report of the Commissioner providing a summary of cases before the Professional Standards Directorate.
- 16.1 **Hearing/Meeting Held**
Members considered cases involving a Hearing or where a meeting was held.
- 16.2 **Case to Answer/Upheld**
Members considered a report on cases where there was a case to answer/upheld.
- 16.3 **No Case to Answer/Not Upheld**
Members considered a report on cases where there was no case to answer/hot upheld.
- 16.4 **Local Resolution**
Members considered a report on cases dealt with via local resolution.
17. **IOPC COMPLAINTS INFORMATION BULLETIN - 1 APRIL 2019 - 30 SEPTEMBER 2019**
Members considered the IOPC Complaints Information Bulletin for 1 April 2019 – 30 September 2019.
18. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**
There were no non-public questions.
19. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE SUB-COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There was no other business.

The meeting ended at 12.50 pm

Chairman

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PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE
CITY OF LONDON POLICE: SUITABLE FOR PUBLICATION - RECIPIENT ONLY

PUBLIC OUTSTANDING REFERENCES

| | | | | |
|-----------|--|--|--------------------------------------|---|
| 8/2019/P | 3 June 2019 Item 8 – PEEL Assessment | Force Communications Plan to be reviewed to ensure it references steps to reassure public over the use of stop and search. | Assistant Commissioner | IN PROGRESS Reference to be closed prior to March 2020 |
| 12/2019/P | 3 June 2019 Item 10 – Questions | Force to provide response on potential use of predictive policing methods to PSI Committee by email | Head of Professional Standards | IN PROGRESS Report to be submitted to future meeting |
| 13/2019/P | 18 September 2019 Item 5 – Force Response to HMICFRS Integrated PEEL Assessment | Planned Skyline article regarding the Force's attitude towards corruption should be circulated more widely, and at least to Members of the Police Authority Board. | Head of Professional Standards | COMPLETED Article circulated to Police Authority Board by email on 20 February at 11.44am |
| 14/2019/P | 18 September 2019 Item 6 – Integrity Dashboard and Code of Ethics Update | Future meeting dates of London Police Challenge Forum to be provided to the Committee. | Head of Strategic Development | IN PROGRESS Dates for 2020 yet to be set and will be circulated in due course. |
| 16/2019/P | 18 September 2019 Item 6 – Integrity Dashboard and Code of Ethics Update | Update to be circulated to Committee regarding status of Development Measure 2.11 (Ethical Drift Survey). | Head of Strategic Development | IN PROGRESS Reference to be closed prior to March 2020 |
| 17/2019/P | 29 November 2019 Item 5 – Police Authority Process for Handling Complaints Appeals Process | New Review Panel Process to be reviewed after three months of operation. | Town Clerk | IN PROGRESS Report to June 2020 meeting |

PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE
CITY OF LONDON POLICE: SUITABLE FOR PUBLICATION - RECIPIENT ONLY

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|-----------|--|--|--------------------------------------|--|
| 18/2019/P | 29 November 2019 Item 6 – CPS File Failures | Report to be submitted to future meeting providing definition of file failure and analysis of impact of file failures and confirmation to be provided outside of meeting how many cases were abandoned due to file failures. | Head of Professional Standards | READY FOR COMPLETION Officer to attend March 2020 meeting to brief Members |
| 19/2019/P | 29 November 2019 Item 8 – Integrity Dashboard and Code of Ethics Update | Future iterations of Dashboard to include clarity on which cases are historic; and clarification on whether data represented individual cases or percentages. | Head of Strategic Development | IN PROGRESS Reference to be closed prior to March 2020 |
| 20/2019/P | 29 November 2019 Item 10(a) – Ethical Economic Partnerships Policy | Ethical Economic Partnerships Policy to be reviewed by Professional Standards and Integrity Committee after one year of operation. | Deputy Head of Police Authority Team | IN PROGRESS Due January 2021 at the earliest |

Agenda Item 5

| | |
|---|--|
| Committee(s): Professional Standards and Integrity Committee | Date: 2 nd March 2020 |
| Subject: Integrity Dashboard and Code of Ethics Update | Public |
| Report of: Commissioner of the City of London Police | For Information |
| Report author: Head of Strategic Development, City of London Police | |

Summary

Integrity Standards Board and Dashboard:

The Force's Integrity Standards Board (ISB) met on 26th February 2020, which was after the Town Clerk's deadline for papers for your Committee, therefore a verbal update of the meeting will be given to your Committee. The appendices to this paper (the Dashboard and the Integrity Development Plan) are therefore included as drafts as they had not been considered by the ISB prior to submission to your Committee.

Code of Ethics Update:

Since your last Committee 1 London Police Challenge Forum (LCPF) event has taken place on the 10th December 2019 hosted by the City of London Police (CoLP). It was a joint event with the Royal Navy. The Head of Strategic Development chaired one of the three panels that each considered the same 4 dilemmas.

The LCPF is rebranding the Police Ethics Engagement Forum to reflect BTP's and others' involvement, and better articulate its role within the emerging Capital Policing Ethics Partnership.

Both the regional and national Ethics panels met in January 2020, the principal subject of discussion was the development of a Data/Digital Ethical Framework to address concerns over the issues being raised by the use of emerging digital technologies.

The Integrity Standards Development Plan is also included for information. It includes an indicator to track progress against the action plan to address areas for further improvement identified in the 2019 integrated PEEL Assessment.

The report from the PEER Review has now been received by the Force. It is generally very complimentary of the work done to date but does offer some recommendations for future development. These will be incorporated into the Integrity Standards Development Plan and presented and will be presented to the next ISB.

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 and 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. The 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 Committee and a representative from the Town Clerk's department.
4. The last board (26th February 2020) met following the Town Clerk's deadline for submission of papers, therefore it has not been possible to include a summary within this report. A verbal update will be provided at your Committee.
5. It follows that the Dashboard (Appendix A to this report) had not been considered by the ISB when this paper was submitted, it is therefore presented as a draft for information. Members should also note that at the time of submission, data relating to training was still awaited and is therefore not included in the draft.

Code of Ethics Update

6. Since your last Committee, 1 London Police Challenge Forum (LCPF) event has taken place, which was hosted by the City of London Police at CH Rolph Hall. It was a joint event between the LCPF and the Royal Navy, consisting of 3 panels (chaired by the Head of Strategic Development, a Chief Superintendent from the Metropolitan Police Service (MPS), and a Royal Navy Surgeon Commander. The latter half of the event was also attended by the MPS Assistant Commissioner.
7. The dates for the 2020 panels have not yet been arranged. Partially as a result of the PEER review, but also due to a reorganisation of how ethics is being approached by the London forces, and to reflect that not only London forces are involved in the group (e.g. the British Transport Police and the Counter Terrorism national command), it is likely the LCPF will re-brand over the following few months to 'Police Ethics Engagement Forum'. This will form a

constituent part of the 'Capital Policing Ethics Partnership' which is envisaged will be constituted by:

- a. The MPS Ethical Issues Scanning Committee (providing strategic oversight of ethical issues impacting the MPS, chaired by DAC Horne (note: CoLP Head of Strategic Development is a member of this group));
 - b. MOPAC Independent Ethics Panel for London;
 - c. Police Ethics Engagement Forum (currently the London Police Challenge Forum); and
 - d. MPS Ethics Research Committee (a new committee that will review all requests for research from an ethical perspective).
8. A relaunch of the LPCF is being planned for April 2020.
9. The LPCF has also been in discussion with a new group set up by the banking and financial service industries to consider the ethical leadership issues resulting from the public perception issues those industries have faced in recent years. They have agreed that the LPCF (which by extension includes CoLP's Head of Strategic Development) can take part in future events, which they anticipate will run 2 or 3 times per year.

Digital Policing event

10. On the 6th December 2019 the MPS hosted an event dedicated to the ethical implications being raised by digital policing. It was attended by many forces, including the City of London Police, and the Home Office. The event was used as a 'stock take' of the current and emerging issues relating to digital policing. The event confirmed how diverse and complex the issue is, with those present agreeing it could not be wrapped up in the general world of ethics but merited a separate working group. A second meeting has not yet been arranged, but when it is, it will look to set up that group from interested and relevant parties from across policing.

Regional Police Ethics Network and UK Police Ethics Guidance Group

11. The last Regional Police Ethics Network was held on the 15th January 2020 in Bristol. Apart from North Wales Police being present for the first time, there was very little new business discussed, with most of the meeting considering outcomes from previously considered dilemmas and planning for the annual conference, which is now deferred until October 2020.
12. The last UK Police Ethics Guidance Group (UKPEGG) was held on 31st January 2020. The evolving Data/Digital Ethics Framework (the subject of the event held at the MPS on 6th December 2019) continued to dominate the agenda. The other major topic considered was the ethical issues raised by forces trying to improve their representation through recruiting against the recently announced uplift.

13. It was also noted at the meeting that the Code of Ethics, which has now been in place for 6 years, should be reviewed. The group offered to set up a working group to support the College of Policing with this task.

Integrity Standards Development Plan

14. The Integrity Standards Development Plan is included for information (see Appendix B). It remains in two sections covering 'commitment' actions and 'development' actions. The commitment section, which is unchanged is intended to ensure that the Force maintains the basic structures to support integrity in the workplace. As long as these are being maintained they will be reflected as 'GREEN'.
15. The development section contains those areas that the Force has introduced for 2019/20.
16. The plan references the areas for further improvement identified by Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services (HMICFRS) for the Legitimacy aspect of their Integrated PEEL Assessment, and progress updates have been included in the plan for Members' information. Progress against HMICFRS recommendations are also reported to the Police Performance and Resource Management Committee.
17. Members will note that one of the areas for development in the plan has been closed. This relates to the long-term integrity review that was discussed last year at a regional ethics network event (Action 2.1) The officer that presented the initiative has now left the force in question and the force is no longer co-ordinating the activity, therefore there is no longer a study to take part in.
18. The single new red area relates to amending the Integrity Standards Development Plan following the receipt of the peer review report (Action 2.4). It was not received until mid-January, which coincided with a period of annual leave and significant activity around the policing plan and Transform. The plan will be amended before your Committee's next meeting and will be submitted to you for information and scrutiny.

Peer Review

19. On the 4th October 2019, the Force underwent an integrity peer review conducted by a Chief Superintendent from Devon and Cornwall Police and a Professor of Ethics and Criminology from Bath Spa University. The review involved an assessment of Force documents (ToR and minutes from the ISB, and Integrity Development Plan) and 4 focus groups (ethics associates, police officers, police staff and Senior Leadership Team members).
20. The final report following that review was received by the Force in mid-January and is attached as Appendix C for information. The report is generally complimentary of the efforts made by the Force to date, but does offer some recommendations for future development. These revolve principally around raising the profile of the LPCF and the role of ethics associates through a communications plan and attracting new ethics associates.

21. Accepted recommendations will be incorporated into the reviewed Integrity Standards Development Plan to be presented to the next ISB and thereafter to your Committee.

Appendices

- Appendix A – draft Integrity Dashboard Quarter 3
- Appendix B – draft Integrity Standards Development Plan (February 2020 update)
- Appendix C – Peer review report for the City of London Police

Stuart Phoenix

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CITY OF LONDON POLICE

**INTEGRITY
DASHBOARD 2019/20
Quarter 3**

Version 1.0



Rationale for Integrity Dashboard

The Integrity Dashboard will report on indicators designed to monitor how the Force is delivering the Police Code of Ethics and highlight behaviour of staff that may not meet the standards set out within the code. The code of ethics is detailed below for reference within this document.

Police Code of Ethics:

1. Honesty and integrity

I will be honest and act with integrity at all times, and will not compromise or abuse my position.

2. Authority, respect and courtesy

I will act with self-control and tolerance, treating members of the public and colleagues with respect and courtesy.

I will use my powers and authority lawfully and proportionately, and will respect the rights of all individuals.

3. Equality and diversity

I will act with fairness and impartiality. I will not discriminate unlawfully or unfairly.

4. Use of force

I will only use force as part of my role and responsibilities, and only to the extent that it is necessary, proportionate and reasonable in all the circumstances.

5. Orders and instructions

I will, as a police officer, give and carry out lawful orders only, and will abide by Police Regulations.

I will give reasonable instructions only, and will follow all reasonable instructions.

6. Duties and responsibilities

I will be diligent in the exercise of my duties and responsibilities.

7. Confidentiality

I will treat information with respect, and access or disclose it only in the proper course of my duties.

8. Fitness for work

I will ensure, when on duty or at work, that I am fit to carry out my responsibilities.

9. Conduct

I will behave in a manner, whether on or off duty, which does not bring discredit on the police service or undermine public confidence in policing.

10. Challenging and reporting improper behaviour

I will report, challenge or take action against the conduct of colleagues which has fallen below the standards of professional behaviour.

Public Confidence Indicator

| FORCE INTEGRITY INDICATORS | | | | | | | | |
|---|--|---------------------------------------|---------------------------|--------------------------|--------------------------------------|-----------------------------|------------------------------|--|
| Number | Indicator | | 2018 Survey Results | | | | | |
| PC 1 | Community Survey Question 4: If you were to have contact with the city of London Police they would act with Integrity. | Survey Type and number of respondents | Percentage Strongly Agree | Percentage Tend to Agree | Percentage Neither Agree or Disagree | Percentage Tend to Disagree | Percentage Strongly Disagree | |
| | | Street (507) | 50 | 40 | 9 | 1 | 0 | |
| | | Online (439) | 50 | 38 | 9 | 2 | 1 | |
| | | | 2019 Survey Results | | | | | |
| | | Survey Type and number of respondents | Percentage Strongly Agree | Percentage Tend to Agree | Percentage Neither Agree or Disagree | Percentage Tend to Disagree | Percentage Strongly Disagree | |
| | | Street (519) | 41 | 52 | 6 | 1 | 0 | |
| Online (103) | 53 | 38 | 8 | 2 | 0 | | | |
| <p>Rationale: This question is asked as part of the public survey and will identify if the Force needs to take action to address how it is perceived by the public. The integrity question asked on the survey will allow the Force to review feedback and address any comments as part of its planning process.</p> <p>The measure will also look to monitor any perception that the public may have of the Force as a result of dealings with officers or through word of mouth and analysis of any comments made by the public will be provided here for additional context.</p> <p>Analysis - The following information has been supplied by Strategic Development: The 2019 survey has now been completed. The 2019 survey results show that the public continues to believe that the Force will act with integrity should members of the public come into contact with officers. This perception has increased slightly since the 2018 survey with 93% percentage of the street responders (increase of 3%) and 91% of online responders (increase of 3%) considering that officers will act with integrity. This is a broadly positive perception of Force officers and shows that there remains high regard for our officers by the public.</p> | | | | | | | | |

FORCE INTEGRITY INDICATORS

| Number | Indicator | 2019 Survey Results | | | | |
|--|---|--|--|--|--|--|
| PC 2 | Victim Satisfaction Survey: Satisfaction with the way you were treated by the police officers and staff who dealt with you | Percentage of respondents that felt | Q1 Number of respondents & satisfaction % | Q2 Number of respondents & satisfaction % | Q3 Number of respondents & satisfaction % | Q4 Number of respondents & satisfaction % |
| | | Were fair in the way they dealt with you | No Data | | | |
| | | Treated you with respect | No Data | | | |
| <p>Rationale: The victim satisfaction survey is undertaken quarterly to assess how the Force deals with victims of crime. The question on how victims were treated by our staff will allow the Force to identify if officers and staff are following the code of ethics for behaviour when dealing with victims of crime.</p> | | | | | | |
| <p>Victims are likely to be upset and distraught when initial police contact occurs and their perception of their treatment will reflect how officers and staff have been trained to deal with the public in what can be difficult and upsetting circumstances.</p> | | | | | | |
| <p>Analysis - The following information has been supplied by Strategic Development: There remains no data to inform on this indicator as the victim survey data has not yet been analysed for Force plan reporting. As soon as this is available this will be provided for the ISB Dashboard.</p> | | | | | | |

HR Indicators

| FORCE INTEGRITY INDICATORS | | | | | | | | | | | |
|--|---|--|-------|-------|-------|-------|---|-------|-------|-------|-------|
| Number | Indicator | Number of Upheld Grievances Relating to Integrity | | | | | Number of Upheld Grievances Made Per Quarter | | | | |
| | | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| HR 1 | Number of Grievances registered with HR Relating to Code of Ethics Issues | 4 | 8 | 3 | | 15 | 1 | 1 | 0 | | 2 |
| <p>Rationale: To monitor the number and themes of grievances investigated within Force to note any potential Code of Ethics issues.</p> <p>Historical Data: 2014/15: 7 Grievances 2015/16: 7 Grievances 2016/17: 13 Grievances 2017/18: 8 Grievances 2018/19: 15 Grievances</p> <p>Analysis - The following information has been supplied by the Head of HR: Of the Three cases registered in Quarter 3: 1 case could be linked to equality and Diversity Code of Ethics, 1 could be related to Equality and Diversity /Challenging and reporting improper behaviour Code of Ethics and final one is not related to a Code of Ethics matter. Currently the 3 new cases from Quarter 3 have not concluded so unable to update ISB as to whether they were upheld or not</p> <p>Update on those case from Quarter 2: Only one case has not concluded. One case withdrawn, 3 cases not upheld and 3 partially upheld with learning.</p> | | | | | | | | | | | |
| Number | Indicator | Number of employment Tribunals Relating to Integrity | | | | | Number of Employment Tribunals held Per Quarter | | | | |
| | | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| HR 2 | Number of Employment Tribunals that cite Code of Ethics Issues | 0 | 0 | 1 | | 1 | 2 | 0 | 1 | | 3 |
| <p>Rationale: To monitor the number and allegations of tribunals to note any potential Code of Ethics issues.</p> <p>Historical Data: 2014/15: 2 Tribunals 2015/16: 0 Tribunals 2016/17: 2 Tribunals 2017/18: 2 Tribunals 2018/19: 1 Tribunal</p> <p>Analysis - The following information has been supplied by the Head of HR: The new ET would be classed as a breach of the following Code of Ethics - Confidentiality/Conduct/Challenging and reporting improper behaviour.</p> <p>In Quarter 3 the outcome of an ET which was related to Equality and Diversity, was settled.</p> | | | | | | | | | | | |

| Number | Indicator | Number of leavers per quarter | | | | | Number of leavers stating Integrity as a reason for leaving the organisation | | | | |
|--|---|----------------------------------|-------|-------|-------|-------|--|-------|-------|-------|-------|
| HR 3 | Number of Police Officer Leavers stating Code of Ethics Issues as a reason for leaving the organisation | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| | | 18 | 16 | 24 | | 58 | 1 | 1 | 0 | | 2 |
| HR 3 | Number of Support Staff Leavers stating Code of Ethics Issues as a reason for leaving the organisation | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| | | 12 | 20 | 7 | | 39 | 1 | 1 | 0 | | 2 |
| <p>Rationale: This will monitor the number of Force leavers (police & support staff) for each quarter and identify if there are any trends through exit interviews that are linked to Code of Ethics for why staff are leaving the organisation.</p> <p>Analysis - The following information has been supplied by the Head of HR:</p> <p>Of the 24 Police officer leavers 13 were as a result of retirement, 2 left as a result of ill health retirement, 4 transferred to other Forces and 5 resigned of their own volition. Of the 24 officers that left only 6 completed an exit interview survey. None of these officers indicated any integrity reason (organisational or otherwise) for leaving.</p> <p>Of the 7 Police Staff that left 4 completed exit surveys none of them indicated an integrity reason for leaving.</p> | | | | | | | | | | | |
| Number | Indicator | Number of dismissals per quarter | | | | | | | | | |
| HR 4 | Number of Dismissals as a result of Code of Ethics Issues | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | | | | | |
| | | 0 | 1 | 0 | | 1 | | | | | |
| <p>Rationale: This will monitor the number of dismissals (police & support staff) for each quarter and identify if there are any trends that are linked to Code of Ethics for why staff are being dismissed.</p> <p>Analysis - The following information has been supplied by the Head of HR:</p> <p>No dismissals in Quarter 3. The Dismissal case in Quarter 2 went to a CoL Appeals panel who did not uphold the individuals appeal so the dismissal stood.</p> | | | | | | | | | | | |

Learning & Development Indicators

| FORCE INTEGRITY INDICATORS | | | | | | | | | | | |
|--|---|---|-------|-------|-------|-------|---|-------|-------|-------|-------|
| Number | Indicator | # Disclosure Courses Undertaken within Quarter | | | | | Total Number of Officers Trained in Disclosure | | | | |
| L&D 1 | Mandatory Code of Ethics Training Given as part of existing Courses | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| | | 3 | 0 | | | 3 | 36 | 0 | | | 36 |
| | | # Stop & Search Courses Undertaken within Quarter | | | | | Total Number of Officers Trained in Stop & Search | | | | |
| | | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| | | 1 | 1 | | | 2 | 10 | 5 | | | 15 |
| | | # Vulnerability Courses Undertaken within Quarter | | | | | Total Number of Officers Trained in Vulnerability | | | | |
| | | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| | | 9 | 25 | | | 34 | 84 | 144 | | | 228 |
| <p>Rationale: To show how many officers are receiving training on Code of Ethics as part of their courses. The information will be taken from the L&D Dashboard showing the number of courses within the quarter and the overall number of staff trained.</p> <p>Analysis - The following information has been supplied by L&D: Data awaited</p> | | | | | | | | | | | |
| Number | Indicator | | | | | | | | | | |
| L&D 2 | Other Code of Ethics Issues Training Input | | | | | | | | | | |
| <p>Rationale: L&D provides input on an ad-hoc basis to supplement training courses to implement national guidance or learning best practice from within Force. Where additional input has been made on Code of Ethics with courses within a quarter a text response will provide oversight into what has occurred and why so that ISB received an update on the wider Code of Ethics training and input made by Learning and Development within quarter.</p> <p>Analysis - The following information has been supplied by L&D – DATA Awaited</p> | | | | | | | | | | | |

PSD Indicators

| FORCE INTEGRITY INDICATORS | | | | | | | | | | | |
|---|---|--|-------|-------|-------|-------|--|-------|-------|-------|-------|
| Number | Indicator | Number of Complaints Made Per Quarter | | | | | Number of Allegations Made per Quarter | | | | |
| PSD 1 | Number of registered complaints against Force excluding Action Fraud that relate to Police Code of Ethics | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| | | 12 | 18 | 24 | | 54 | 13 | 18 | 48 | | 79 |
| | | Number of Complaints Upheld Per Quarter | | | | | Number of Allegations Upheld Per Quarter | | | | |
| | | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| | | 1 | 0 | 0 | | 1 | 1 | 0 | 0 | | 1 |
| | | Number of Upheld Complaints Relating to Integrity | | | | | Number of Upheld Allegations Relating to Integrity | | | | |
| | | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| 0 | 0 | 0 | | 0 | 0 | 0 | 0 | 0 | | 0 | |
| <p>Rationale: Monitoring the number of complaints and allegations will allow the Force to identify if there are specific trends that may require management action to address, this could identify the need to amend processes or Force culture depending on the nature of the complaints received. Each complaint made may have a number of associated allegations so monitoring this will allow the overall volume of work undertaken by PSD to be revealed.</p> <p>Historical Data: 2014/15: 117 Complaints 2015/16: 105 Complaints 2016/17: 102 Complaints 2017/18: 90 Complaints 2018/19: 54 Complaints</p> <p>Analysis - The following information has been supplied by PSD: The substantial increase on recorded allegations is due to the increased complexity of the complaints being made. Complainants are making allegations about every aspect of an interaction or incident. .</p> | | | | | | | | | | | |
| Number | Indicator | Number of Cases Per Quarter | | | | | Number of Cases Relating to Integrity | | | | |
| PSD 2 | Number of Civil cases which cite the Force (including Judicial Reviews) relating to Code of Ethics Issues | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| | | 5 | 3 | 3 | | 11 | 0 | 0 | 0 | | 0 |
| | | <p>Rationale: Civil cases include Civil Claims, Judicial Reviews, Employee Liability, Liable and Slander, and Professional Indemnity. Claims represent a potential financial (even where there is insurance cover); and reputational risk, and outcomes can effect operational strategy and effectiveness.</p> <p>Historical Data: 2014/15: 24 Cases 2015/16: 23 Cases 2016/17: 17 Cases 2017/18: 18 Cases 2018/19: 23 Cases</p> <p>Analysis - The following information has been supplied by PSD: There are no civil claims of any significant and include threat of civil action and claims for damage for execution of warrants.</p> | | | | | | | | | |
| Number | Indicator | Number of Cases Per quarter | | | | | | | | | |
| PSD 3 | Cases of Abuse of Authority for Sexual Gain | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | | | | | |
| | | 0 | 0 | 0 | | 0 | | | | | |
| | | <p>Rationale: This is a serious integrity matter that is of concern at a national policing level. The reporting of this will provide perspective on whether or not the Force is being transparent with reporting and monitoring this issue and breach of public trust.</p> <p>Analysis - The following information has been supplied by PSD: The force is robust at mitigating the possibility of abuse of authority.</p> | | | | | | | | | |

| Number | Indicator | Number of Misconduct Proceedings Per Quarter | | | | | Number of Misconduct Proceedings that relate to Honesty & Integrity | | | | |
|--|---|--|-------|-------|-------|-------|---|-------|-------|-------|-------|
| | | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| PSD 4 | Misconduct Proceedings that relate to Code of Ethics Issues | 1 | 0 | 1 | | 2 | 0 | 0 | 0 | | 0 |
| | <i>Rationale: Misconduct proceedings are a result of proven allegations or investigations by PSD into other areas of officer behaviour such as Gifts & Hospitality, Business Interests or Procurement. The number of misconduct hearings per quarter will be reported against the number relating to Police Code of Ethics.</i> | | | | | | | | | | |
| | <i>Analysis - The following information has been supplied by PSD: The latest is a matter that has been going on for 9 years for use of force which was not found.</i> | | | | | | | | | | |
| Number | Indicator | Number of Reports Per Quarter | | | | | Number of Reports that Result in a PSD Investigation | | | | |
| | | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| PSD 5 | Number of internal referrals to PSD (i.e. BadApple) | 5 | 6 | 6 | | 17 | 5 | 6 | 6 | | 17 |
| | <i>Rationale: To capture the use of the Force internal systems and identify if staff feel confident in using the processes or if there are issues with their use and adoption in Force.</i> | | | | | | | | | | |
| | <i>Analysis - The following information has been supplied by PSD: The indicators shows that PSD actively take Bad Apple Reports seriously.</i> | | | | | | | | | | |
| Number | Indicator | Number of Random Tests Per Quarter | | | | | Number of Positive Tests Per Quarter | | | | |
| | | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| PSD 6 | Quarterly Random Drug Testing | 0 | 0 | 0 | | 0 | 0 | 0 | 0 | | 0 |
| | <i>Rationale: To ensure Police Officers are tested as part of the Force random drug testing policy so that there are no issues with the misuse of drugs within the workforce.</i> | | | | | | | | | | |
| | <i>Historical Data: 2016/17: 0 Positive Tests 2017/18: 0 Positive Tests 2018/19: 0 Positive Tests</i> | | | | | | | | | | |
| <i>Analysis - The following information has been supplied by PSD: There have been no positive results that PSD are aware of going back historically.</i> | | | | | | | | | | | |

Corporate Communications Indicators

| FORCE INTEGRITY INDICATORS | | | | | | | | | | | |
|----------------------------|--|---|-------|-------|-------|-------|-----------------------------------|-------|-------|-------|-------|
| Number | Indicator | Number of Media Contact Recorded within Quarter | | | | | Number Referred to PSD for notice | | | | |
| | | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total | QTR 1 | QTR 2 | QTR 3 | QTR 4 | Total |
| CC 1 | Number of unauthorised media contacts referred to PSD | 0 | 0 | 0 | | 0 | 0 | 0 | 0 | | 0 |
| | <i>Rationale: Corporate Communications are in a position to identify any unusual contact with the media by police officers and staff which could lead to compromise or corruption, or be unethical or unprofessional and may be reported to PSD for investigation or intelligence.</i> | | | | | | | | | | |
| | <i>Analysis - The following information has been supplied by Corp Comms: No referrals have been made for quarter 3.</i> | | | | | | | | | | |

Data Owners and Sources

| No. 1 | Indicator | Owner | Data Source |
|-------|--|--------------------------|--------------------------|
| PC 1 | Community Survey Question 4: If you were to have contact with the city of London Police they would act with Integrity. | Strategic Development | Strategic Development |
| PC 2 | Victim Satisfaction Survey: Satisfaction with the way you were treated by the police officers and staff who dealt with you | PIU | PIU |
| | | | |
| HR 1 | Number of Grievances registered with HR Relating to Code of Ethics Issues | HR | HR |
| HR 2 | Number of Employment Tribunals that cite Code of Ethics Issues | HR | HR |
| HR 3 | Number of Police Officer Leavers stating Code of Ethics Issues as a reason for leaving the organisation | HR | HR |
| | Number of Support Staff Leavers stating Integrity as a reason for leaving the organisation | HR | HR |
| HR 4 | Number of Dismissals as a result of Code of Ethics Issues | HR | HR |
| | | | |
| L&D 1 | Code of Ethics Training Given as part of existing Courses | L&D | L&D Monthly Dashboard |
| L&D 2 | Other Code of Ethics Issues Training Input | L&D | L&D Monthly Dashboard |
| | | | |
| PSD 1 | Number of registered complaints against Force excluding Action Fraud that relate to Police Code of Ethics | PSD | PSD |
| PSD 2 | Number of Civil cases which cite the Force (including Judicial Reviews) relating to Code of Ethics Issues | PSD | PSD |
| PSD 3 | Cases of Abuse of Authority for Sexual Gain | PSD | PSD |
| PSD 4 | Misconduct Proceedings that relate to Code of Ethics Issues | PSD | PSD |
| PSD 5 | Number of BadApple Reports | PSD | PSD |
| PSD 6 | Quarterly Random Drug Testing | PSD | PSD |
| | | | |
| CC1 | Number of unauthorised media contacts referred to PSD | Corporate Communications | Corporate Communications |

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Appendix B

POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2019-20 February 2020 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 (then) 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 19 | Sep 19 | Nov 19 | Feb 20 |
| 1.1 Force has issued a statement committing to support and embed the Police Code of Ethics | GREEN | GREEN | GREEN | GREEN |
| 1.2 Maintain the Force Integrity Delivery Plan | GREEN | 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 | GREEN |
| 1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas | GREEN | GREEN | GREEN | GREEN |
| 1.5 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes | GREEN | GREEN | GREEN | GREEN |
| 1.6 Maintain a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates) | GREEN | GREEN | GREEN | GREEN |
| 1.7 Maintain a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan | GREEN | GREEN | GREEN | GREEN |
| 1.8 Ensure training on standards, values and leadership ethics is available for all staff | GREEN | GREEN | GREEN | GREEN |
| 1.9 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures | GREEN | GREEN | GREEN | GREEN |

| 2. Development Measures | Traffic Light Tracker | | | |
|---|-----------------------|--------|--------|----------|
| | May 19 | Sep 19 | Nov 19 | Feb 2020 |
| 2.1 Consider with HR/OD taking part in the long term 'ethical drift' survey | AMBER | RED | RED | CLOSED |
| 2.2 Consider an internal board to advise on and review key decisions and processes | CLOSED | CLOSED | CLOSED | CLOSED |
| 2.3 Conduct an annual review of the Force integrity programme and implement identified improvements | WHITE | WHITE | WHITE | AMBER |
| 2.4 Arrange an independent peer review of organisational integrity arrangements | AMBER | AMBER | AMBER | RED |
| 2.5 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assesment report when published. | AMBER | AMBER | AMBER | AMBER |

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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COMMITMENT DASHBOARD – These indicators represent provisions the Force must maintain as a foundation for its processes and governance concerning the continuing promotion and embedding of integrity and the Code of Ethics. Detailed reporting will be by exception if any of the provisions change from their ‘green’ implemented status.

| INDICATOR | Current position (Feb 2020) | May 19 | Sep 19 | Nov 19 | Feb 20 |
|--|---|--------|--------|--------|--------|
| 1.1 Force has issued a statement committing to support and embed the Police Code of Ethics | Included in all major force publications – Policing Plan, Corporate Plan and Annual Report | GREEN | GREEN | GREEN | GREEN |
| 1.2 Maintain a Force Integrity Delivery Plan | Plan in existence since Nov 2016, updated quarterly | GREEN | 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 | The Integrity Standards Board is established, chaired by a chief officer, attended by all directorates and representatives from the Town Clerk’s Department and Police Authority Board. The last meeting was November 2019 | GREEN | GREEN | GREEN | GREEN |
| 1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas | In existence and attend Integrity Standards Boards | GREEN | GREEN | GREEN | GREEN |
| 1.5 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes | In existence, last outcomes published 12 th December 2019 (checked February 2020) | GREEN | GREEN | GREEN | GREEN |
| 1.6 Maintain a process to support the Force’s participation in the London Panel Challenge Forum (Ethics Associates) | Maintained, last meeting 10 th December 2019, next meetings planned for April 2020 | GREEN | GREEN | GREEN | GREEN |
| 1.7 Maintain a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan | The Assistant Commissioner is the lead for integrity matters, chairing Integrity Standards Board, Organisational Learning Forum, Crime Data Integrity Oversight Board and lead on the associated area of Professional Standards. The Commander (Ops) additionally chairs London Police Challenge Forum panels for additional resilience | GREEN | GREEN | GREEN | GREEN |
| 1.8 Ensure training on standards, values, leadership and ethics is available for all staff and included in all mandatory training | Information on standards, values and leadership is available to all staff on the intranet. All mandatory training courses incorporate the Code of Ethics, which is also part of induction. | GREEN | GREEN | GREEN | GREEN |

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| | | | | | |
|---|--|-------|-------|-------|-------|
| 1.9 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures | 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 | GREEN | GREEN | GREEN | GREEN |
|---|--|-------|-------|-------|-------|

| 1. Development Measures | |
|---|---|
| MEASURE | 2.1 1 Consider with Human Resources/Organisational Development taking part in the long term 'ethical drift' survey |
| OWNER | Head of Strategic Development / HR/ OD |
| AIM/RATIONALE | To inform Force development. The survey seeks to assess levels of ethical decline over an officer's career. This will inform long term planning around activities that can be put in place to mitigate any decline. |
| MEASUREMENT | Head of Strategic Development to provide ISB with details of activities supporting this indicator |
| DUE BY | July 2019 |
| TRAFFIC LIGHT CRITERIA | Green: participation agreed and rolled out Amber: Activity in train (within due time) but not delivered. Red: No activity and past due datearticipation |
| TRAFFIC LIGHT | ACTION CLOSED |
| CURRENT POSITION | |
| <p>May 2019 - Initial discussions have taken place with Organisational Development, who are broadly supportive of the proposal. A meeting is still to take place with HR. If HR agrees, a paper will be prepared for Integrity Standards Board to consider, to cover the proposal and roles and responsibilities.</p> <p>Aug 2019 update – no decision has yet been taken. HoSD to meet with Head of HR to progress before the next ISB (3rd September).</p> <p>Nov 2019 update – The Transform programme is doing some work on organisational culture and it is felt this study would complement that work. The HR representative on that programme has agreed to be the link for this work and contact has now been made with the Regional Police Ethics Network expressing our interest in taking part in this study. Pending the outcome of that request, and arrangements being made locally for ongoing participation, this action will remain red until those things are in place.</p> <p>Feb 2020 update – Head of Strategic Development the Regional Police Ethics Network clerk made contact with the police force originally cited as running this survey. The individual that presented at the regional meeting no longer works for the force and no-one else is progressing this on their behalf. The force is not co-ordinating or progressing any such survey. This action is accordingly closed.</p> | |

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| 1. Development Measures | |
|---|---|
| MEASURE | 2.2 Consider an internal board to advise on and review key decisions and processes |
| OWNER | Head of Organisational Development |
| AIM/RATIONALE | 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 2019 |
| 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 | ACTION CLOSED |
| CURRENT POSITION | |
| <p>The ISB held in December 2018 allocated this as an action to the Head of Organisational Development to consider as part of the Leadership review.</p> <p>May 2019 - This matter CLOSED was considered at a meeting of the Senior Leadership Team who decided that a separate panel is not required. This action will not therefore be progressed and is.</p> | |

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| 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 | November 2019 |
| 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>The peer review (see following indicator) and anything emerging from regional and national meetings will inform this indicator, which is not due until October 2019.</p> <p>Nov 19 update: The peer review took place on October 4th 2019. The Force awaits the results of the review, which will form the basis of the annual review.</p> <p>Feb 20 update: The Force received the PEER review results mid-way through January. They are now being considered and accepted recommendations will be included in a reviewed implementation plan, to be presented to the next Integrity Standards Board.</p> | |

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| 2 Development Measures | |
|--|--|
| MEASURE | 2.4 Arrange an independent peer review of organisational integrity arrangements |
| OWNER | Head of Strategic Development |
| AIM/RATIONALE | To assess the extent to which integrity related arrangements in force are sufficient and embedded, and inform development of this plan |
| MEASUREMENT | Review complete and action plan amended |
| DUE BY | September 2019 |
| TRAFFIC LIGHT CRITERIA | Green: Review complete and action plan amended Amber: Action taken to organise the review, or review complete but no changes to action plan. Red: review not yet complete or completed by no changes to action plan after 2 months following receipt of the report |
| TRAFFIC LIGHT | RED |
| CURRENT POSITION | |
| <p>May 2019 – Contact has been made with Bath Spa University, who will oversee the Peer Review, with the following agreed: Professor McVean (Professor of Ethics Bath Spa University) to observe a meeting of the London Police Challenge Forum on 13 September 2019 and interview panel members. Ch Supt Sam De Reya (Devon and Cornwall Police) to visit the Force on October 4th to review existing provisions and conduct focus groups with senior personnel and front line personnel. A report will be prepared thereafter which will inform the development of this plan going forward.</p> <p>Aug 2019 – the May update remains current</p> <p>Nov 2019 update – the peer review took place on 4th October 2019, however, as the results have not yet been received by the force and no changes have been made to the action plan as a result, this indicator remains AMBER as per the traffic light criteria.</p> <p>Feb 2020 update – the review report was received mid-January 2020. This coincided with significant activity around the new policing plan, Transform and a period of annual leave for the Head of Strategic Development. The report has been reviewed but the development plan not yet amended. It will be complete before the next Integrity Standards Board.</p> | |

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| 2 Development Measures | |
|---|--|
| MEASURE | 2.5 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assesment report |
| OWNER | Head of Strategic Development (and any other relevant individual identified by the report) |
| AIM/RATIONALE | To ensure the Force actions best practice identified by HMICFRS. |
| MEASUREMENT | Progress reported to Performance Management Group and ISB |
| DUE BY | March 2020 |
| TRAFFIC LIGHT CRITERIA | Green: All AFIs delivered; Amber: Action in progress to deliver AFIs but not fully delivered; Red: AFI not delivered by due date |
| TRAFFIC LIGHT | AMBER |
| CURRENT POSITION | |
| <p>The Integrated PEEL report was published in early May. Whilst the Force was graded ‘Requires improvement’ for the Legitimacy aspect of the inspection, two of the areas identified for further improvement are relevant to integrity and the Code of Ethics:</p> <p>AFI 7 and 8 – the Force should review is external scrutiny of use of force and stop and search</p> <p>AFI 9 – the Force should extend its unconscious bias training to all its officers</p> <p>AFI 10 – The Force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up to date and include current data</p> <p>AFI 11 – The Force should ensure that its counter corruption unit (1) has enough capability and capacity to counter corruption effectively and proactively; (2) Can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the Force’s data and indentify computer misuse; and (3) Builds effective relationships with individuals and organisations that support and work with vulnerable people.</p> <p>August update: An action plan to address all the AFIs identified in the report has been drafted. A report has been submitted to the next Professional Standards and Integrity Committee (18th September) providing details of the Force’s response to these AFIs. This indicator will remain open until all actions have been delivered.</p> <p>February 2020 update: AFIs 7 and 8 remain AMBER. Both areas were scrutinised by the PAB at its November meeting through the Use of Force (part of the Custody update) and stop and search update. A revised group now exists. Training of members of the group is ongoing, with a first meeting to assess data scheduled for March 11th. Following that meeting taking place, this should be GREEN.</p> <p>AFI 9 is GREEN – training commenced in November 2019, with completion being tracked by Learning and Development and reported to Performance Management Group.</p> <p>AFI 10 is AMBER – these documents were reviewed for 2018/19 but are now being re-evaluated for 2019/20. A Nactional Crime Agency updated threat assessment was received in December 2019, against which Force documents are being evaluated. It is anticipated this will be GREEN by the due date.</p> <p>AFI 11 is AMBER – Although staff have been recruited there remains an issue connected to the monitoring of computer systems, which is being addressed but which is maintaining this indicator at AMBER.</p> | |

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Police Ethics Network (South West, Wales & London Region)

Police Code of Ethics & Ethics Committee Peer Review on *4 October 2019* at:



City of London Police

1. Introduction

The Police Ethics Network (SW, Wales and London) agreed it would be most beneficial if a peer review process could take place between member organisations who wished to take part in the exercise. The purpose of the review is to identify and support knowledge and understanding of the benefits and challenges in relation to the Code of Ethics and Ethics Committees or Panels.

The peer review is a tool to support forces in reflecting upon the current status of their activity and to inform further advancement and enhancement. This is particularly important as the Code of Ethics is a new statutory framework for all police officers and staff, and so development in this area is relatively new.

What the peer review is not, is an inspection or any intention to use a benchmark against other forces. It is a review to support the innovative work being undertaken by those involved in developing this area of work.

2. Methodology

The review team comprised of a Professor of Policing and Criminology and a Chief Superintendent from Devon and Cornwall Police. The review team members are not employees or had any commercial interest with City of London Police.

The peer review involved five separate focus groups, including

1. Ethics Associates of London Police Challenge Forum (LPCF) (3 members)
2. Senior Chief Leader and LPCF Administrator
3. Police Officers from the City of London Police (8 officers)
4. Police Staff from the City of London Police (6 staff)
5. SLT Team (3 representatives)

The focus group lasted for approximately one hour.

In addition, a London Police Challenge Forum *Administrators Questionnaire* had been completed prior to the visit.

3. Development and Structure of the LPCF in relation to City of London Police

The LPCF was officially launched in December 2016. The first Panel Meetings took place in March 2017. The Panel Meetings comprise of a minimum of 2 panels that are held concurrently. Panel Meetings are held every 8 to 12 weeks.

Each LPCF Panel is chaired by an officer or staff leader in the rank of Chief Superintendent of higher and the equivalent for staff.

There are currently 6 active LPCF Panel Chairs:

| LPCF Chair | Organisation | Rank/Position |
|------------|----------------------------|-------------------------------|
| 1 | City of London | Head of Strategic Development |
| 2 | City of London | Det. Chief Superintendent |
| 3 | MPS | Chief Superintendent |
| 4 | MPS | Det. Chief Superintendent |
| 5 | British Transport Police | Chief Superintendent |
| 6 | National Counter-Terrorism | Det. Chief Superintendent |

There are approximately 130 Ethics Associates (panellists) that comprise of 20 City of London Police Officers and Staff (the remaining being made of 40 British Transport Police, 55 Metropolitan Police service and 15 National Counter-Terrorism Police).

The LPCF meets independently of the Professional Standards Committee of the City of London Corporation (the equivalent of the PCC for the City of London) although they are regularly updated on LPCF matters by the City of London Police Senior Leader.

Any police officer or police staff member of the City of London Police is free to submit an application to become an Ethics Associate. Once an officer or member of staff expresses an interest to the Administrator, they complete the application form which explicitly asks why they wish to become a member of the LPCF and what would they bring to the role.

The completed application form is then sent to the LPCF lead for the City of London Police. The LPCF lead for the City of London is a member of the Senior Leader's Team. Applicants agree on submission of the application form for a check with the Professional Standards Department. Once the application is approved, the co-ordinator is then able to invite the new Ethics Associate to all future LPCF meetings and events.

The LPCG have Terms of Reference, which were agreed in late 2016 by the three original organisations (The National Counter-Terrorism Police did not join the LPCF until June 2018). A revised and updated version was written in 2018 but these have not been ratified yet (although it was indicated the revised version would be confirmed and ratified very shortly).

4. Ethics Panels and Ethical Dilemmas

There have been a total of 23 meetings held to date.

| Dates | Meetings | Number of Panels |
|--------------|-----------------------------|------------------|
| 2017 | 8 | 2 |
| 22018 | 8 | 2 |
| 2019 to date | 12 (with another 4 planned) | |

The numbers of ethical dilemmas that have been presented to the Ethics Committee for consideration are:

| Dilemmas submitted from October 2017 | Number |
|--|--------|
| Total number of ethical dilemmas submitted | 52 |

Any police officer or staff of the City of London Police may submit an ethical dilemma to the LPCF. The City of London Police has a dedicated page on their Intranet site to the Code of Ethics and the LPCF; located in this page is an ethical dilemma submission form. Ethical dilemmas are submitted via on-line to the LPCF Administrator.

The LPCF Administrator contacts the referrer of the dilemma to discuss the submission and ensure it is suitable and in an appropriate format for discussion by the LPCF Panels.

As tabled above, 52 ethical dilemmas have been submitted to the LPCF thus far. Out of those 52 dilemmas, two have been deemed as unsuitable by the LPCF Leaders. These were considered unsuitable as they were related to potential or on-going professional standards investigations into individual officers at the time of submission.

Currently, there is no facility to refer anonymously.

The suggestions and recommendations of the Ethics Panels to ethical dilemmas are fed back via a Guidance Statement which is made available to the referrer.

It is also noted that several ethical dilemmas have been submitted to both the Regional and UKPEGG Ethics Committees.

The Guidance Statements for the first 12 dilemmas have been published on the LPCF organisations intranet pages. Plans are in hand to place the outstanding Guidance Statements on these pages very shortly.

5. Interview with Senior Chief Lead and LPCF Administrator

As noted above the LPCF is made up of four organisations; the City of London Police, the Metropolitan Police Service, British Transport Police and the National Counter-Terrorism Unit. These organisations, collectively, represent 20% of UK policing. The City of London Police currently has 18 Ethics Associates represented on the LPCG.

Consistent with the development of Ethics Committees elsewhere in England and Wales, the LPCG required re-energising and revitalising a year or so after the initial launch. The LPCG is supported by a sergeant in a full time capacity to provide the Administration and co-ordination. The Administrator must be commended on his dedication and commitment to this agenda since its inception.

Again, in keeping with organic learning and development, all the Ethics Associates are invited to the Panel meetings thus increasing representation across the four organisations. The Panels provide feedback and learning directly to each member force which also links to local, regional and national learning. As the dilemmas submitted are cross-organisational, it provides for rich discussion and learning. These dilemmas have also included operational issues,

Part of the learning of the LPCF has been the potential (real or perceived) ‘conflict’ between forces, but the nature of police ethics is that it transcends geographic boundaries and specific force/organisational objectives.

The Senior Chief Leader for the City of London stated:

“the peer review is an opportunity to look at what next for the ongoing delivery of the Code of Ethics. Activity will include the potential of the increased involvement in the panels and completing the circle of learning by distributing findings.”

One of the challenges to date has been the undulating interest in the panels; there is an ebb and flow of interest in articles and information on Internet. Senior management

is exploring how to maintain consistent momentum and sustainability of activity in the long term.

It was reflected that the embedding of ethics in policing has been very different to other agendas:

“Diversity is nationally led and driven whereas ethics has been different...

The Code of Ethics has not been driven nationally or centrally but driven by passionate individuals. The College of Policing has not provided support for the agenda as expected.”

The link between the City of London ethics lead to the Regional PEN is seen as useful and provides depth of conversation, especially in relation to different forces reporting back on what they are doing and what works, which provides rich cross fertilisation of ideas; ‘the PEN is a very dynamic group’.

It was considered that the UKPEGG was seen as more strategic, which was necessary but not as useful as the PEN for local issues, but good to bring the wider issues across the country to discuss and share ideas, and provide a framework for UK organisational learning.

6. Ethics Associates Focus Group

The Associates were motivated to join the Panels because they had a deep interest in the ethical dilemmas that the City of London encounters and have to deal with:

“The dilemmas are cross cutting across policing and it’s important we understand them and throw them out there to discuss”.

“It’s a worthwhile process and I enjoy listening to the dilemmas and throwing a different perspective into the discussion”.

The Associates considered that developing and embedding an Ethics Panel was an interesting concept, which worked outside the norm and was forging a new direction in policing. Reference was made to the different and diverse types of dilemmas that had been presented, from issues as such as copy write to the criminalising children. The participants who had attended Panels found the meetings interesting and relevant

to policing and communities. It highlighted those different challenges that police encounter on a daily basis.

One participant had attended the panel on one occasion, one on three occasions and one had not yet been invited to attend, but was keen to do so.

“I felt I was treated fairly and my voice was heard on the panel.

The group was a reasonable size and was chaired well, which was positive and it made a difference to the conversation. Last time I attended was last month and then another 2 months ago”.

It was reported that normal policing demands and work commitments can have an impact on being able to attend the Panels: It can be difficult for the Associates to fit them in their diary as the commitment with travel is half a day.

The format of the meeting, in that the Chair poses question and there is an opportunity to discuss amongst the Associates and take down views and thoughts, was considered to be positive.

“It tends to be a healthy discussion, where you are able to say your piece and give your view from your organisation”.

When asked if the Panels were making a difference the response was

“Leadership around ethics depends on who is in the top seat at this moment in time makes a difference. Sometimes you need a policy around it to get it delivered”.

That said, it was considered that any form of reflection and listening to others was good and encouraged being open to talking on the thoughts and feelings of others.

“It is great to give time and your voice to hear other people’s experience as it encourages you to think differently”.

One of the outcomes for the Ethics Associates was that although there was not a light bulb moment, it did provide some self-awareness and the ability to look at different perspectives.

The participants of this focus group has not submitted dilemmas or advised others to do it, although they were quite clear that there were no obstructions to submitting a dilemma.

“Talking things through is a great a way of problem solving and to get others views. Locally I do discuss the panel dilemmas with my contacts and teams”..

It was considered that the City of London could make better use of the Panels. Suggestions about improving communication and reminding staff that the LPCF exists as well as publicising the outcomes and impacts would help to get people involved. They interviewees felt that if the Panels had impacted or contributed to how the City of London does it business, this should be publicized.

It was noted that the feedback and outcome of the discussion could take some time to be reported back and the interviewees were unsure how the outcomes were published.

One of the interviewees had informed his team about the Panels, but reported that the reaction had not always been positive. He felt that ethics was a slower-burn initiative that would take time but would be an instrumental part of policing today and in the future.

The Ethics Associates were aware of the ethical videos and tools available, but felt that there was limited awareness of these across the City of London. This was coupled with the general feeling of police officers and staff being under increasing pressure, which is representative of policing at the moment.

That said, there was positive enthusiasm for the ethics agenda to be part of and potentially enhance the Transformation Programme.

7. Senior Leader Team (SLT) Focus Group

The SLT was represented by participants from Intelligence, Response and Strategic departments.

It was decided that a separate lead for Code of Ethics would be allocated in the City of London in order for ethics not to be associated with the Professional Standards Department (PSD). The rationale for this was that the City of London police wanted it to be about being proactive and about making the right decisions. This approach has synergy with the work of Professional Standards whose approach is to support their people and prevent wrongdoing leading to discipline.

However, the Transformation Programme provides a framework for enhancing and embedding ethics further. An overview of the ethical framework for work delivered by the Transformation Programme, included and could include:

- Integrity standards board – governance and meeting structure in place
- Integrity Sub-Committee – external
- London Police Challenge Forum commitment
- Dashboard – oversight of grievances, PSD, complaints (not seen by the SMT)
- Paperwork and policy – to include an area for Ethics considerations – applying it to professional practice
- Not a standalone Ethics Committee
- Decision making – in the every day
- Professionalism – PSD ‘Here to help’
- PSD engagement role – to increase a role to support this helping and support role (capacity issues with this)
- PSD – ethical decision making and using the Coe of Ethics to close down investigations
- 3 misconduct boards – found for the people on the Board (Line management delivery)

When asked how useful the Code of Ethics is for the SLT, it was considered helpful to use as guidance and for consideration in operational decision making. The City of London use videos and tools to support this guidance.

“The Code of Ethics is a tool and a shield to consider decision making and to ensure transparency, fairness and integrity. As an AO and leader I have used the Coded of Ethics to support authorisation to justifying decisions and leadership”.

The initial response to the Code when it was first introduced and the examples used by the College of Policing were considered “bland and not relevant. I did wonder how this was going to change things and make things happen”.

All the senior leaders received a training NCALT package (including 20 questions) to raise awareness of ethics and the Code of Ethics and the LPCFs and London conferences have provided some specific training.

When asked how they use the Code of Ethics in everyday business, the responses included:

“I don’t specifically have conversations about it but it is part of the responsibilities at different levels. I’ve seen in a subtle change in language ‘I don’t think that’s ethical’. The word ‘ethics’ can sometimes be seen as scary, but we are now using that word”.

One leader felt that Ethics was a mind-set he had seen demonstrated in understanding vulnerability (describing it as multi-faceted):

“There has been good feedback on vulnerability, non-judgemental policing approaches. The Vulnerability Training had taught officers and staff – ‘don’t go with a predetermined outcome’.

It is about the Ethical way you treat people and looking for the reason why people offend”.

The area of ethics and vulnerability also reached into other areas of business such as Custody involving vulnerable people and children. One of overall objectives of the City of London Police was to understand the impact of vulnerability and to test it. This included reviewing the Custody CCTV footage and it was found that not one single incident was criticised.

The interviewees also provided another good example, which was the reviewing of practice and checking stop and search rates that showed good proportionality rates.

That said, it would appear that there have been very few ethical dilemma submissions from City of London to the LPCF. There was a view in some areas of the City of London that there was little point of it and the discussions have been very general. The group were also not sure about feedback mechanisms and it was an area that would benefit from improvement.

The SLT focus group felt that the ethic panels could explore some of the more significant issues facing the force. For example, drugs, in relation to market hardening in that 2,000 text messages were sent to mobile phones where offending activity had been identified on at least 3 occasions as an attempt to act as a deterrent to further criminality. Or the issue of the repeal of the Vagrancy Act, in which there was a moral

issue of is it right for the police to impose fines on people who have no means of payment and when it is felt that this is a wider societal issue than just policing.

There was a discussion around the need to introduce and embed ethics into training from the beginning in order to make it 'business as usual'. This would support greater opportunity to develop challenge as well as impact on leadership, decision making and policies.

8. Police Officer Focus Group

Three out of the seven attendees had heard of the ethics panel's with knowledge of what they were there for and their function. No one had submitted an ethical dilemma, although two participants stated that their boss – who was an Ethics Associate - would discuss the contents and views of the panels with the team and what had been the outcome and suggestions of the dilemma.

There was a general agreement that some officers and staff were cynical of the Ethics Panel, with little understanding of how they would use it at work. There were further observations that the work and outcomes from the Panel does not filter down to officers and staff.

Some members of the group questioned the value of the panels and what they could contribute beyond the knowledge of Code of Ethics standards and principles. An alternative view was that the Code of Ethics was important and formulised what officers and staff should be doing within policing. That it is a good prompt for new staff and officers to understand standards and expectations.

It was agreed that the panel could improve communications to support understanding of what discussed and the outcomes to the ethical dilemmas. At this point of the discussion, the police officer group could not see that it had made a difference to the organisation. They stated they felt the organisation jumped to discipline rather than ethics when there may have been the better solution, such as line managers dealing with behaviour and minor ethical issues rather than going to PSD.

The discussion turned to the understanding and merit of the Code of Ethics;

“It is common sense and provides a structure around doing what you should be doing in policing”.

“It doesn't mean a lot to me other than providing a cycle for the rationale.

I feel detached from it”

“It provides clear guidance on what the public would expect”.

“It is only when you are going for promotion and a job interview that it becomes more meaningful”.

There was general consensus that the Code of Ethics and the national Decision Making model were useful frameworks to use to write statements and to provide justification for decisions.

“It does not stop the organisation beating you over the head regarding your decision-making. It’s a way of providing information on decision-making of how you operated ethically so it can be taken into account”.

An insightful comment was made about the Code of Ethics in that it is generally only referred to when something has gone wrong and not when it goes right.

The focus group note that “there are some good people on panel”. This gave the Panels a degree of credibility. It was also stated that Ethics Champions would be good at promoting the work of the Panels, the communication as well as follow up and feedback. Communication of the outputs of the Panel and how that impacts on policy and practice would be useful, particularly as the interviewees, generally, had not be aware of the suggestions, advice and action. They felt that this form of communication would make a difference to organisational learning and support change in the way the organisation operates.

One participant reflected that good decisions were generally not recognised but bad ones were harshly dealt with. The reward and recognition scheme was viewed as positive, although it was sometimes behind schedule so the recognition was ‘out of date’. The group also suggested that this may be an opportunity to look at how they reward ethical behaviour. Although this was caveated by the conduct recognised should go through ‘due diligence’ on who gets it and who doesn’t. This may include acknowledging good ethical action even when the outcome is bad - but the person made the right ethical decision. It is the context and circumstances surrounding the decision making.

It was suggested that examples and feedback on dilemmas would assist officers and staff to understand the value of the Panels and that promotion of how to submit dilemmas may improve submission rates.

9. Staff Focus Group

Three out of four members of group had heard and had some understanding of the LPCF, while the remaining member was aware of its existence, but not its structure or remit.

When asked what they would do if they encountered an ethical dilemma, the response included:

“I would discuss with line manager or someone in the appropriate position.

I would raise with Stuart as the Ethical Lead as he is a trusted leader”.

The members of this focus group articulate that when risks are highlighted, they are managed through line management, the organisational risk register, and policies and procedures. The Risk and Business Continuity Committee and Senior Management Board include discussions on local and organisational issues.

The Integrity Standards Board also has a dashboard to monitor concerns and issues which are more internal than external. Organisational Learning and development is linked to the Integrity Standards Board and supports the understanding and improvement with some governance in place. In addition, the Bad Apple is available for referrals to raise sensitive issues.

The Code of Ethics was launched within the City of London Police with a robust strategy that included workshops and training packages for officers and staff. In addition a dedicated Intranet was developed to support the strategy. The Code of Ethics is also embedded into specific areas of policing, for example, it is linked to the training for NCRS as part of the agenda to ensure strict compliance with crime recording.

Moreover, the process and documentation relating to areas such as policing and corporate plans, development strategies and policy records include an area for the Code of Ethics to be considered and signed off. This prompts and encourages ethics to be considered and referred to. However, it was noted – or there is a perception - that the City of London police Values are different to the Competency Values

Framework and Code of Ethics – induction ‘Leadership development programme ‘everyone has leadership qualities.

It was mentioned that HMIC have encouraged a corporate governance process, which prompted a review of corporate credit cards. There led to the standardisation of buying equipment and the audits of officer expenses for overseas. A deeper understanding about ethics has enabled challenge. For example, officers and staff have been challenged around sunglasses and a jacket put on to corporate credit cards. This sends a powerful message to officers and staff about the expected standards of conduct more widely. One of the members of the Group observed:

“Good ethics and integrity makes sure we don’t undermined public confidence. When resourcing crimes and screening out, its not unethical when it can be justified”.

Another member volunteered:

“Scrutiny needs to be intrusive and start to challenge the force. There would be push back on some decisions such as restructuring the force and a proposal to increase Superintendent posts. Then I would challenge it”.

It was suggested that consistent messaging about ethics, ethical leadership and the LPCF from the ‘Top Team’ would be positive and beneficial to the organisation. It was noted that PSD roadshows and ‘Drop-ins’ go down very well. There were also a number of issues that could be usefully submitted to the Ethics Panels for consideration, including the number of people acting up before their retirement and receiving a ‘golden handshake’; officers and staff who are unsuccessful at promotion boards but they maintain acting/temporary roles for 18 months; and acting-up for 2 years having failed a board.

10. Observations and Comments:

- The Ethics Lead for the City of London is commended in his dedication and commitment to this agenda within the Force.
- The Administrator for the LPCF works closely with the Ethics Lead, which has been beneficial for both parties. The LPCF Administrator has been committed

and steadfast to this agenda which has contributed to the developments in this agenda.

- Similar to other police forces that have set up Ethics Panels and Ethics Committees, the marketing of the Committee and call for dilemmas is a challenge, particularly at the start. This challenge is even greater for the LPCF given the geographical dimension and the collaboration of four organisations.
- The City of London may wish to consider the development of a communication strategy relating to ethics and the Code of Ethics, including the role and function of the LPCF and how to submit a dilemma as well as including the outcomes of dilemmas that are submitted. This information will be essential to maintaining the momentum of the agenda.
- The City of London has 18 Ethics Associates on the LPCG; this represents approximately 14% of the LPCF members. The City of London may wish to review how to encourage more representation on the LPCG.
- The Ethics Lead may want to review how membership and participation of the LPCF can be incorporated into CPD for officers and staff.
- Police officers and staff have varying degrees of understanding and knowledge about the Code of Ethics and the role and function of the LPCG: this is to be expected given the complexity of the subject and the time required for ethics to be conceptualised, developed and embedded into police processes and practices. That said, the level and comprehension of those officers and staff who did understand was excellent.
- The Ethics Associates were dedicated and committed and felt they had been supported by a good training/events programme. It is important to ensure that the training programme is continually refreshed when necessary.
- There may be merit in exploring if ethical dilemmas can be submitted anonymously, although effort should be given to attracting ethical dilemmas in operational and strategic planning.
- It was noted that the Transformational Programme was an exceptional framework to further develop and embed ethical practice and policy. Attaching the ethics agenda to this framework is to be commended for innovation.
- It may be useful to consider introducing some the ethical tools available in sessions such briefings etc to ensure regularity and consistency of implementing the ethics agenda.

- It was noted that the Code of Ethics was not just supported by the LPCG, but a vigorous strategy comprising of a range of inter-related activities, including videos and other tools.
- There was a deep and consistent understanding of what the Code of Ethics was and the rationale for its introduction. However, there are still small pockets in the organisation that do not fully appreciate the utility of the Code in terms of decision-making and leadership.

> Police complaints:

Statistics for England and Wales
2018/19

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1

Introduction

This report presents figures on complaints recorded about the police in England and Wales in 2018/19. These complaints, made by members of the public, are about the conduct of people serving with the police, or are about how the force is run (a ‘direction and control’ complaint). They are dealt with under the *Police Reform Act 2002*.

Police forces deal with the majority of complaints themselves, with the IOPC handling only the most serious and sensitive cases. The first stage of complaint handling is for the relevant police force to decide whether to record the complaint¹. When a complaint is recorded, it must be dealt with according to certain rules and guidance. If the force does not record a complaint, the complainant can appeal against this decision to the IOPC.

People can also appeal at the end of their complaint if they are not happy with how the police have handled it. In some instances, this appeal right is to the IOPC. Other appeals are handled by police forces.

We include a number of indicators throughout

the report. These are a useful tool to judge objectively how well complaints are being handled. These indicators are unambiguous, unlike data such as the number of complaints recorded, where an increase can be interpreted as either good or bad. Therefore, they can be used by police forces to consider how they could improve the way they handle complaints. When viewed in isolation, each indicator gives only limited insight, 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 data about 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 each force's data with the forces most similar to them.

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

2

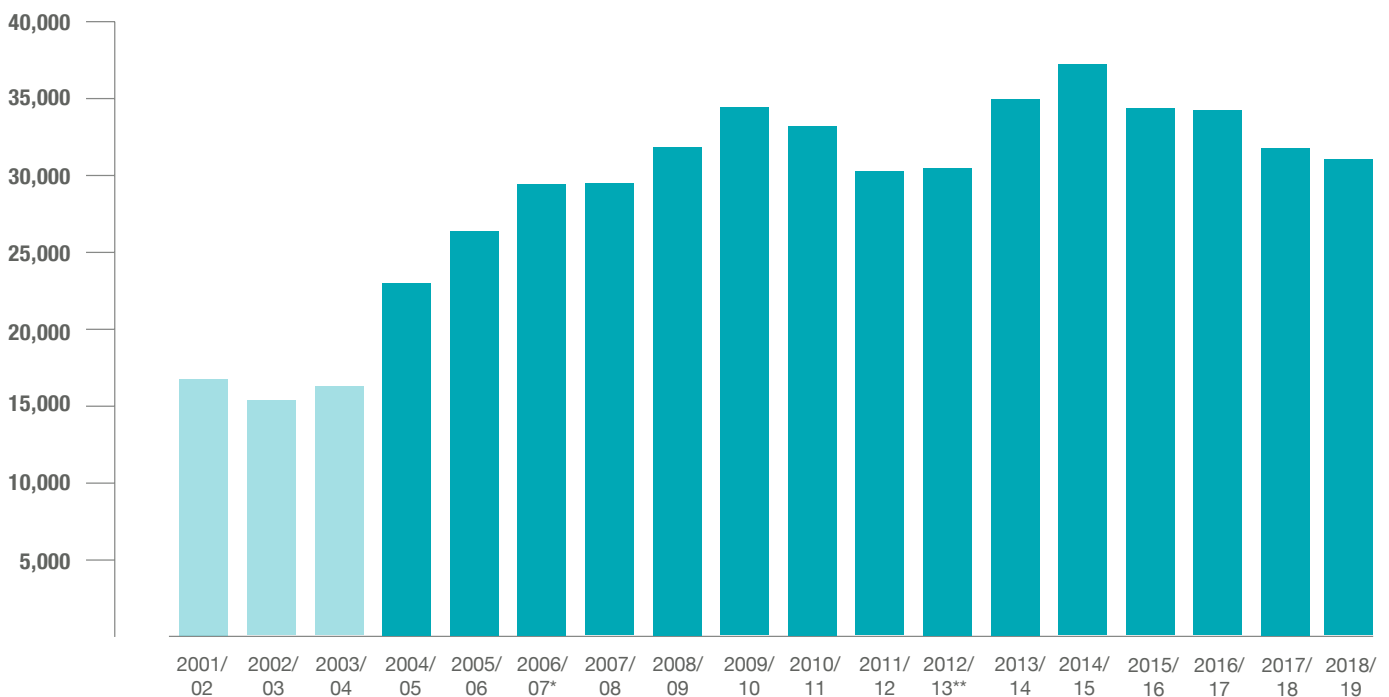
Findings

Complaint cases recorded

The number of complaint cases recorded in 2018/19 fell compared to 2017/18. Police forces continue to record most complaints within the target of ten working days.

- > Forces recorded a total of 31,097 complaint cases in 2018/19 – 2% fewer than the total in 2017/18 (figure 1 and table 2).
- > More than half the forces reduced the number of complaints they recorded. Eight forces recorded over 20% fewer complaints than the previous year. However, four forces increased the number of complaints they recorded by more than 20% (table 3).

Figure 1: Complaint cases recorded 2001/02 – 2018/19



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

**The definition of a complaint was broadened on 22 November 2012 to include direction and control.

Key indicator: police forces are expected to record complaints within ten working days (table 4)². Timeliness of recording complaint cases within ten working days increased to 89% in 2018/19 compared to 84% in the two preceding years.

- > Most forces recorded more than 80% of their complaints within ten working days.
- > Thirty-one forces had either maintained or improved the timeliness of their recording complaint cases in 2018/19, compared to 2017/18.

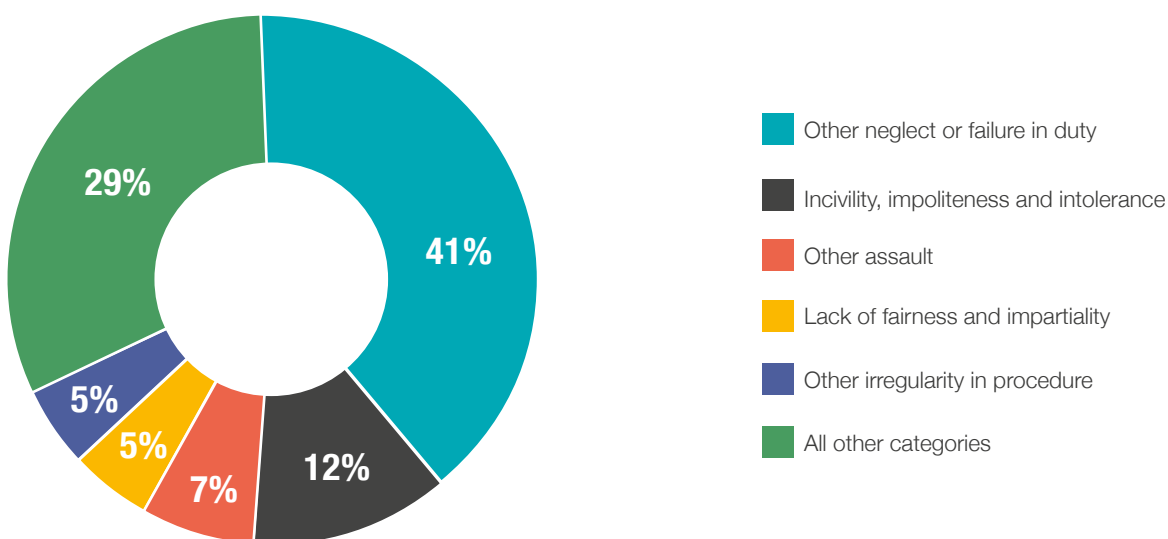
Allegations recorded

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

In 2018/19, the number of allegations recorded decreased.

- > During 2018/19, a total of 58,478 allegations were recorded. This is a 5% decrease compared to the previous year (table 5).
- > The five most commonly recorded allegation categories account for 70% of all the allegations recorded in 2018/19 (figure 2 and table 6).
- > The most common allegation was recorded under the ‘other neglect or failure in duty’ category. This category accounted for 41% of all the allegations recorded in 2018/19; a further increase on 39% in 2017/18 and 37% in 2016/17.
- > Direction and control allegations accounted for 3% of all allegations recorded in 2018/19, the same figure as 2017/18⁴.

Figure 2: Allegations recorded in 2018/19 by category



² Information about the initial recording of a complaint is available in section 3 of our Statutory Guidance (2015) <https://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 <https://www.policeconduct.gov.uk/research-and-learning/statistics/complaints-statistics>

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) <https://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 2018/19, 264 allegations per 1,000 employees across all forces were recorded compared to 274 in 2017/18. This decrease in allegations per 1,000 employees is in line with the decrease in the number of overall allegations received in the year. Allegation rates across police forces ranged from 93 to 465 per 1,000 employees (table 7).
- > The ten forces who had the highest allegation rates in 2018/19 are the same as in 2017/18.
- > Of the ten forces who had the lowest allegation rates in 2018/19, seven of them were also in the lowest ten forces in 2017/18.
- > The changes in the numbers of allegations per 1,000 employees ranged from an increase of 59% in South Wales Police to a decrease of 41% in West Midlands Police.

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 or discontinuance⁶. 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 – this does not include any time during which the complainant can appeal.

In 2018/19, forces finalised 54,987 allegations (table 8). The proportion of allegations investigated in 2018/19 decreased. In contrast, the proportion of allegations locally resolved increased and was the most common means of dealing with an allegation (figure 3). This reflects the trend seen in the previous five years to locally resolve more and investigate less. It is the first year since 2008/09 that more allegations were locally resolved than were investigated.

- > 40% of allegations finalised in 2018/19 were investigated. It was 44% in 2017/18.
- > The proportion of allegations locally resolved increased in 2018/19 to 48% from 42% in 2017/18.

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.

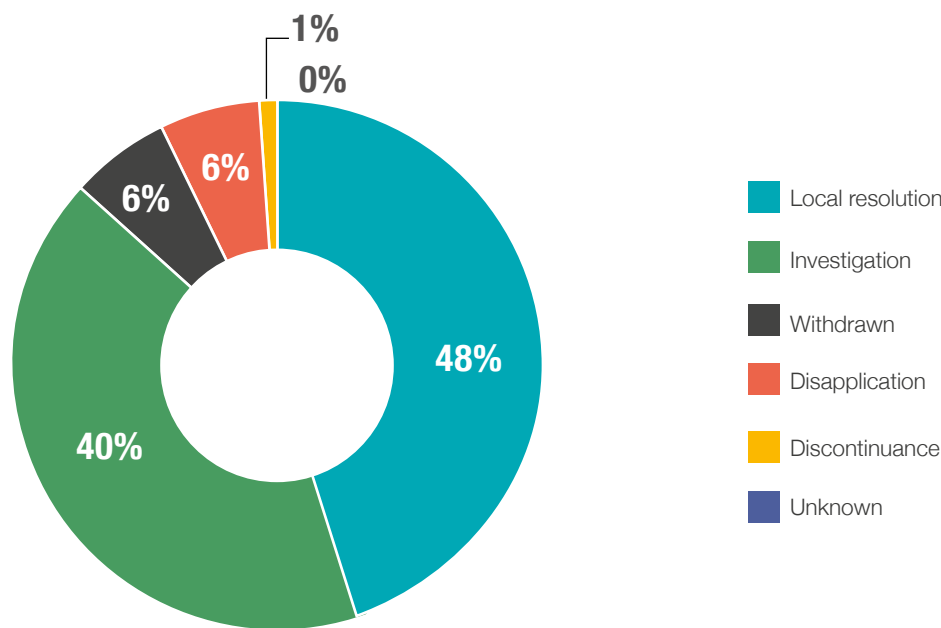
⁶ More information about finalising allegations can be found in our Guidance on the recording of complaints under the *Police Reform Act 2002* <https://policeconduct.gov.uk/complaints-and-appeals/s Duty guidance>

Allegations not proceeded with

- > Of the total number of allegations finalised in 2018/19, 7% were the subject of a disapplication or discontinuance, the same proportion as 2017/18.
- > The proportion of allegations dealt with in these ways in 2018/19 varied across police forces from 0% in British Transport Police to 17% in Dorset Police.

- > 6% of allegations were withdrawn in 2018/19, the same proportion as 2017/18.
- > The proportion of allegations withdrawn varied across police forces, from 1% in Cumbria Police to 23% in Gwent Police.

Figure 3: Method of finalising allegations in 2018/19



Key indicators: overall in 2018/19, the length of time taken to deal with allegations by local resolution was similar to 2017/18, whereas the length of time to finalise allegations by investigation fell compared to last year (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, the same as in 2017/18.

- > Twenty-three police forces took longer to locally resolve allegations in 2018/19 than in 2017/18.
- > On average, it took 158 working days (more than seven months) to locally investigate an allegation, compared to 173 days in 2017/18.
- > There were considerable variations between forces, from an average of 87 working days for Cheshire Constabulary to an average of 289 days for West Midlands Police.

- > Twenty-three forces were quicker or took the same time to locally investigate allegations in 2018/19 than in 2017/18.
- > Fourteen forces took longer in 2018/19, on both local resolution and local investigation, to finalise allegations than in 2017/18.
- > Thirteen forces were quicker in 2018/19, on both local resolution and local investigation, to finalise allegations than in 2017/18.
- > In 2018/19, 21,764 allegations were finalised by investigation. 10% of these were subject to special requirements, compared to 13% in 2017/18 (table 10).
- > The proportion of investigated allegations subjected to special requirements ranged from none in Dyfed-Powys Police to 59% in North Yorkshire Police.

Handling of allegations finalised by investigation

If at any time during an investigation of a complaint, the investigating officer thinks a person complained about may have

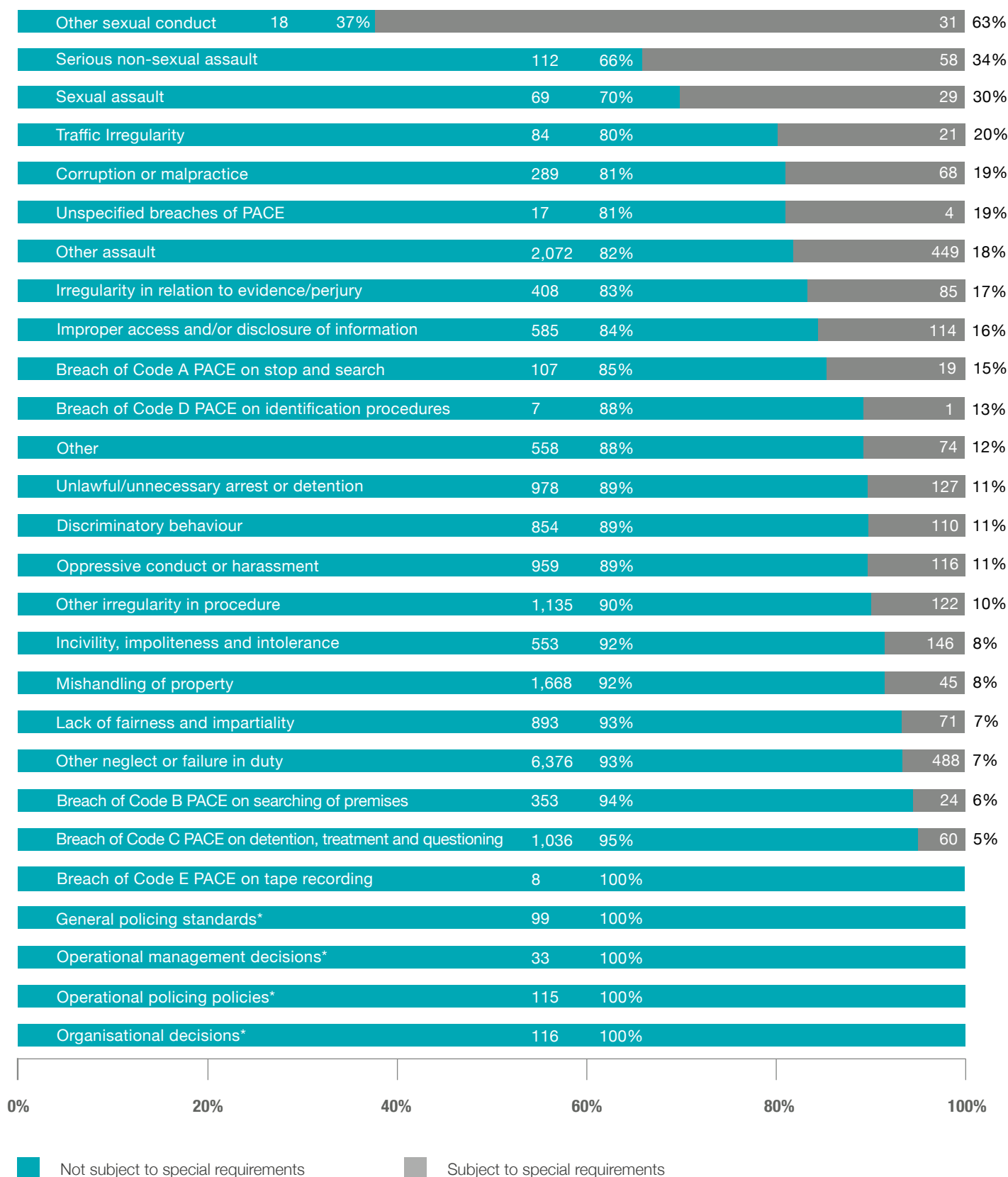
- committed a criminal offence; or
- behaved in a manner which would justify the bringing of disciplinary proceedings⁷

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

There was also variation in the proportion of investigated allegations subjected to special requirements depending on the category of the allegation (figure 4 and table 11). 63% of allegations of 'Other sexual conduct' were investigated under special requirements, compared to 5% of allegations relating to 'Breach of Code C PACE on detention, treatment and questioning'.

⁷ 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 2018/19



*Direction and control allegations cannot be subject to special requirements

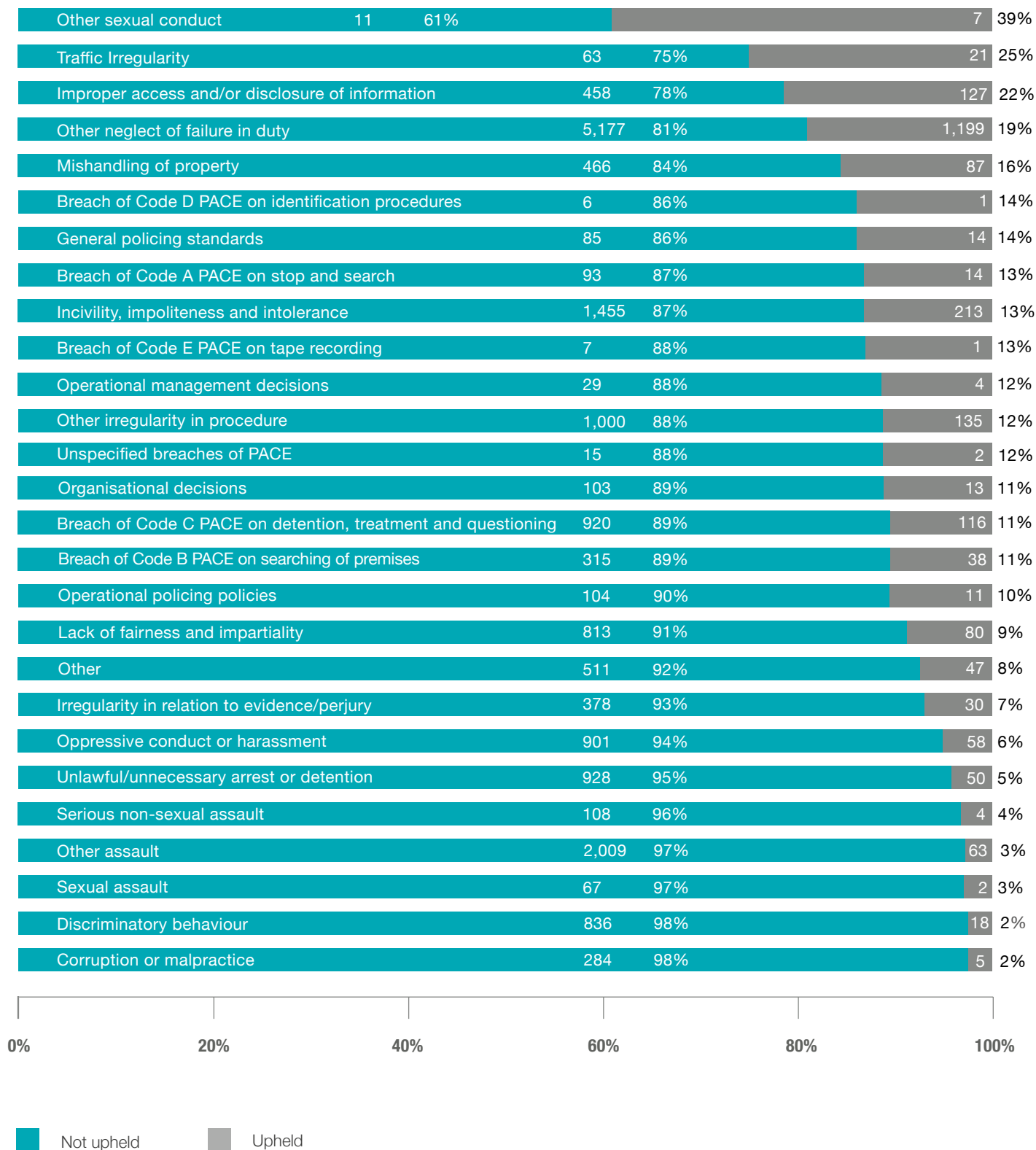
Results of allegations finalised by investigation not subject to special requirements

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

- > Of the 19,502 allegations not subject to special requirements, 12% (2,360) were upheld (table 10a).
- > The rate at which allegations were upheld varied across forces, from 3% in Nottinghamshire Police and Greater Manchester Police to 27% in Gwent Police.
- > Over three quarters of forces (36 of 44) upheld fewer 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). 39% of allegations about 'Other sexual conduct' were upheld, compared to 2% of allegations of 'Corruption or malpractice' or 'Discriminatory behaviour'.

Figure 5: Category of allegations finalised by investigation not subject to special requirements in 2018/19



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 concluded⁸

> A total of 29,033 complaints were finalised in 2018/19. This is a decrease of 8% compared to 2017/18 and is the third year in a row that this figure has decreased.

Key indicator: complaint cases took less time to finalise in 2018/19 (table 12).

- > It took an average of 110 working days to finalise complaint cases in 2018/19, six working days fewer than in 2017/18.
- > The average time forces took to finalise complaint cases ranged from 64 to 198 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 103 working days in 2018/19. This is five days fewer than the average time reported in 2017/18.

- > The average time across police forces ranged from 57 to 192 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, depending on how the complaint has been dealt with. An appeal can be made about:

- the decision not to record a complaint
- the outcome of a local resolution process
- the determination(s) and outcomes of a local or supervised investigation
- the decision to discontinue a local investigation
- the decision to disapply the requirements under the *Police Reform Act 2002*
- the outcome of a complaint that has been subject to disapplication⁹

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 officer¹⁰.

All appeals received

In 2018/19, the total number of appeals received across the entire police complaints system fell by 4% compared to 2017/18.

⁸ 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.

⁹ 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

¹⁰ 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 IOPC received 1,416 non-recording¹¹ appeals, a decrease of 9% from the previous year.
- > The number of local resolution appeals received by either the IOPC or chief officers was 2,775, an increase of 20% from the previous year.

- > The number of investigation appeals received was 1,987, a decrease of 23% from the previous year.

Figure 6: Appeals received 2014/15 – 2018/19

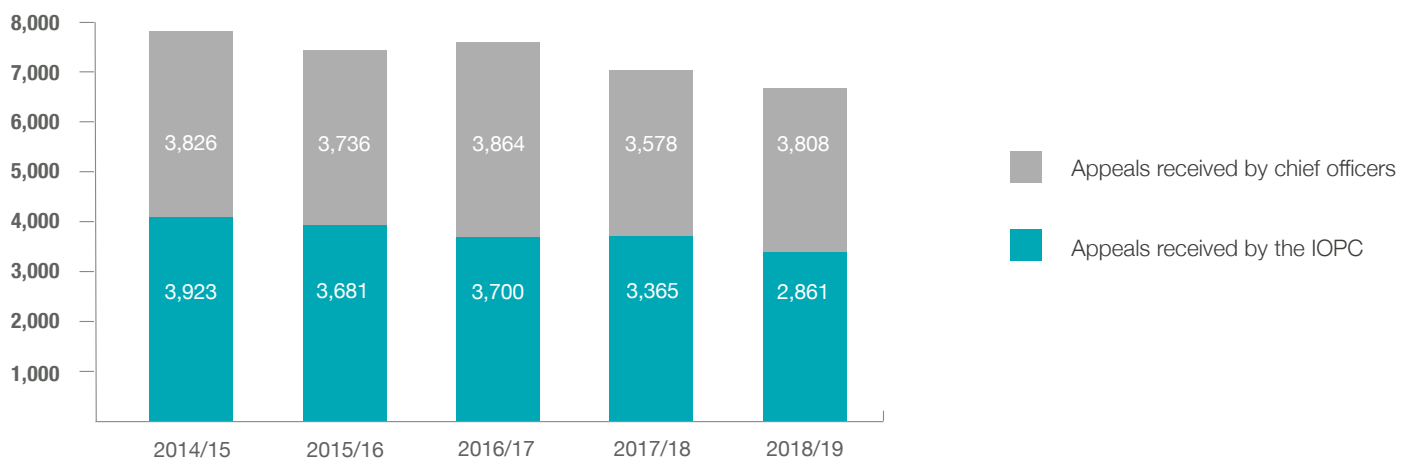
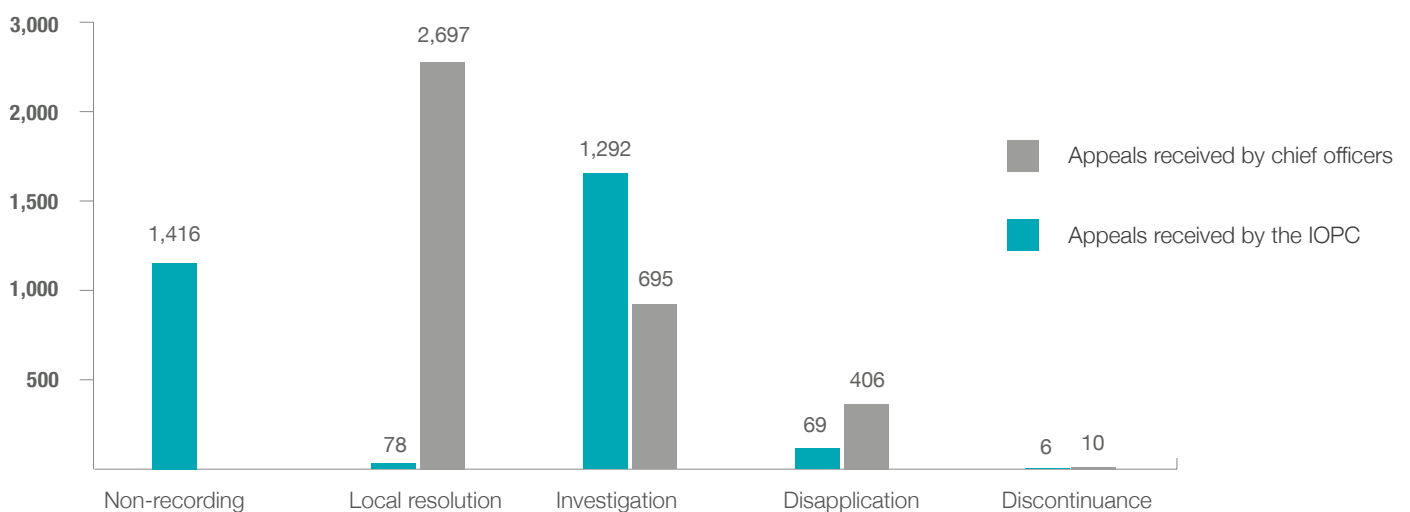


Figure 7: Appeals received in 2018/19 by appeal body and appeal type



¹¹ The right of appeal against non-recording is to the IOPC only.

Appeals received by chief officers

In 2018/19, chief officers received 3,808 appeals about the way their force handled a complaint. This represents a 6% increase on the number received in 2017/18 (table 13 and figure 6).

- > The number of local resolution appeals chief officers received increased by 18% compared to 2017/18. These represent 71% of all the appeals chief officers received in 2018/19 (tables 13 and 14 and figure 7).
- > The number of appeals received about an investigation into a complaint decreased by 25% compared to the number received in 2017/18. This represented 18% of all the appeals received by chief officers in 2018/19 (tables 13 and 14 and figure 7).
- > The number of disapplication appeals received increased in 2018/19 by 10% to 406, while discontinuance appeals decreased from 13 to 10 (table 13 and figure 7).
- > Five forces did not receive any investigation appeals (table 14).

Appeals received by the IOPC

In 2018/19, the IOPC received a total of 2,861 appeals about the handling of a complaint by a police force. This is a decrease of 15% compared to 2017/18 (table 16).

- > The number of non-recording appeals received decreased by 9% compared to

2017/18. This represented just under half of all the appeals received by the IOPC in 2018/19 (tables 16 and 17 and figure 7).

- > The number of local resolution appeals received more than doubled compared to 2017/18 – the IOPC received 78 of these appeals in 2018/19 and 37 in 2017/18. This represented 3% of the appeals received by the IOPC in 2018/19 (tables 16 and 17 and figure 7).
- > The number of appeals received about an investigation into a complaint decreased by 22% compared to 2017/18. This represented 45% of all the appeals received in 2018/19 (tables 16 and 17 and figure 7).
- > The number of disapplication appeals received decreased in 2018/19 by 41% to 69. Discontinuance appeals increased from 3 to 6 (table 16).

All appeals upheld

For most appeal types, the upholding rates of both the IOPC and chief officers were similar to 2017/18 upheld rates. The exception to this was disapplication appeals, where 19% were upheld by the IOPC in 2018/19, compared to 11% in 2017/18. The IOPC also continued to uphold more appeals than chief officers. There remained considerable variations between forces both in their own upheld rates and in the IOPC's upheld rate.

Table 1: Appeals completed and upheld in 2018/19 by relevant appeal body and appeal type

| Appeal type | IOPC appeals | | | Chief officer appeals | | |
|------------------|-------------------------|---------------|----------|-------------------------|---------------|----------|
| | Number valid completed* | Number upheld | % upheld | Number valid completed* | Number upheld | % upheld |
| Non-recording** | 1,236 | 447 | 36 | | | |
| Local resolution | 70 | 47 | 67 | 2,416 | 379 | 16 |
| Investigation | 1,310 | 492 | 38 | 673 | 84 | 12 |
| Disapplication | 59 | 11 | 19 | 387 | 36 | 9 |
| Discontinuance | 2 | 0 | 0 | 10 | 4 | 40 |

*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'. In addition, 66 appeals completed in 2018/19 were recorded on police force systems with a decision 'Upheld-NFA' or 'Upheld-Info only'. These decision values are not recognised in the data the IOPC receives from forces. Therefore, appeals with either of these decisions are not included in upheld and valid completed counts.

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

Appeals upheld by chief officers

Key indicators: in 2018/19, the proportion of local resolution appeals upheld by chief officers remained stable, while the proportion of investigation appeals upheld decreased compared to 2017/18.

- > 16% of local resolution appeals completed by chief officers were upheld in 2018/19, the same figure as 2017/18. The upholding rate across police forces ranged from 0% in Leicestershire Police and West Mercia Police to 48% in the Metropolitan Police Service (excluding one force which completed fewer than ten local resolution appeals) (tables 13 and 15).
- > In 2018/19, 12% of investigation appeals were upheld, compared to 16% in 2017/18. Looking at the 26 forces which completed at least ten investigation appeals, the upholding rate varied from 2% in West Mercia Police to 24% in Warwickshire Police and the Metropolitan Police Service. Five forces did not complete any investigation appeals (tables 13 and 15).

- > 9% 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. Four completed none (table 15).

- > In 2018/19, ten discontinuance appeals were completed, four of which were upheld (table 15).

Appeals upheld by the IOPC

Key indicators: the proportion of non-recording and investigation appeals upheld by the IOPC in 2018/19 was the same as 2017/18, but there was an increase in the proportion of local resolution appeals upheld (table 16).

- > The upholding rate for non-recording appeals remained stable in 2018/19 at 36%. The upholding rate varied considerably across police forces from 8% for Bedfordshire Police and Cheshire Constabulary to 82% in West Mercia Police (this excludes one force with fewer than ten completed appeals) (table 18).

- > 67% (47 of 70) of the local resolution appeals completed were upheld, which is an increase from 63% in 2017/18.
- > In 2018/19, 38% of the investigation appeals completed were upheld. This is the same proportion as 2017/18. The upholding rate varied considerably across police forces from 14% for North Wales Police to 70% for South Yorkshire Police (this excludes one force with fewer than ten completed appeals) (tables 16 and 18).
- > In 2018/19, the IOPC upheld 19% (11 of 59) of the disapplication appeals completed, compared to 11% in 2017/18 (tables 16 and 18).

Grounds for upholding IOPC appeals

The IOPC considers appeals about the handling of complaints on various grounds and can uphold an 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 2018/19¹². 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 authority¹³ 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 2018/19:

- > 139 (31%) were upheld because the appropriate authority had failed to make a recording decision, a fall from 35% in 2017/18.
- > 19 (4%) were upheld because the police force that received the complaint failed to pass it on to the correct appropriate authority. This is a similar level to last year.
- > 306 (68%) were upheld because the recording decision was incorrect – an increase from 61% last year.

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
- 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 2018/19:

- > More than a third (204, 41%) were upheld on the ground that the complainant was given inadequate information, the same figure as in 2017/18.
- > Most (411, 84%) were upheld on the findings of the investigation, unchanged from last year.

¹² 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

¹³ Legal definitions are available in section 15 of our Statutory Guidance (2015) www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

- > 56 (11%) were upheld on the determination(s) in relation to misconduct, gross misconduct or performance, a decrease compared to 18% in 2017/18.
- > 163 (33%) were upheld on the action to be taken (or not taken) as a result of the investigation, compared to 36% in 2017/18.
- > The least common ground on which investigation appeals were upheld was the determination not to make a referral to the CPS. Only six appeals (1%) were upheld on this ground, down from 2% the previous year.

Profile of complainants

In 2018/19, 30,212 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 5% compared to 2017/18 when 31,719 people complained.

- > Most complainants were men (17,577, 58%). This has been the case each year since 2004/05 (table 19).
- > Where known, most complainants were White (13,451, 45%), which is similar to previous years. It should be noted that the ethnicity of 45% (13,426) of complainants was either not stated or unknown (table 20).
- > Where the age of the complainant is known, the most common age groups to complain about the police in 2018/19 were those aged 30 to 39 years (5,699, 19%) and those aged 40 to 49 years (5,678, 19%). The people who complained least commonly were aged 17 or under (247, 1%). The age of 22% of complainants (6,701) was unknown (table 21).

Profile of those complained about

In 2018/19, 34,181 people serving with the police were subject to a recorded complaint – a decrease of 2% compared to 2017/18, when 34,913 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 2018/19, most people subject to a recorded complaint were police officers (29,842, 87%), the same proportion as 2017/18 (table 22).
- > 70% (23,965) of those subject to a recorded complaint were men, compared to 71% in 2017/18 (table 23).
- > 82% (27,916) of those subject to a recorded complaint were White. The proportion of those where ethnicity was either unknown or not stated has increased from 9% in 2017/18 to 12% in 2018/19 (table 24).

3

Discussion

As with the complaints statistics we have collated in previous years, the statistics for 2018/19 vary widely from force to force. This makes it difficult to draw any meaningful national conclusions on several aspects of the complaints system. An increase or decrease in any particular statistic is not necessarily a 'good' or a 'bad' indication. In addition, forces are recording fewer complaints as they handle more matters informally. Without formal recording, complaints do not form part of these statistics. Changes to the police complaints system scheduled to take effect in 2020 mean that data related to matters that are not formally recorded will be captured. Therefore, we will be able to report a fuller picture for the 2020/21 statistics.

Customer service when a complaint is first made

The number of non-recording appeals that the IOPC receives has been between 1,500 and 1,700 for the previous five financial years. In 2018/19, we received fewer than 1,500 non-recording appeals – the lowest number since 2012/13.

The drop in the number of non-recording appeals could be driven by a number of factors. One possible reason for the drop is

that forces are increasingly handling matters outside the formal complaints system and fewer people wish to appeal because the matter they raised has been resolved. It could also mean that some complainants are unaware of their right to appeal or lose confidence in the complaints system because of the way their concerns were handled. As we do not have all the data on these matters, we cannot easily draw conclusions.

However, the [IOPC has published a large amount of guidance](#) on the recording of complaints, including describing situations when complaints do not need to be recorded. The guidance also sets out how to explain a decision not to record a complaint to a member of the public in an accessible way. The drop in the number of appeals received could also be an indication that the quality of the correspondence explaining the decision has improved and people are better able to understand why their complaint was not recorded. We are upholding fewer appeals against non-recording, which does indicate that the decisions being made by forces are improving. For 20 forces, the number of non-recording appeals has dropped and the number we upheld has either stayed the same or has further reduced. Forces where experienced team members make recording

decisions (such as Avon and Somerset Police, Leicestershire Police and North Wales Police) tend to perform best in making these decisions in a timely manner. They also have fewer non-recording appeals upheld by the IOPC.

Several forces are delivering a good service in the early days of complaint handling:

- > At Cheshire Constabulary, dedicated complaints managers make recording decisions within ten working days in 97% of complaint cases. In 2018/19, we upheld only two appeals against complaints not being recorded by this force (8% of the non-recording appeals for Cheshire).
- > Kent Police uses an alert system when a complaint hasn't been recorded to ensure that they are making recording decisions within ten working days. They achieved this in 96% of complaint cases in 2018/19.
- > The Metropolitan Police Service reviewed and streamlined its processes, brought in a new database and introduced clear process maps for making recording decisions. The force improved its performance, recording complaints within ten working days in 90% of complaint cases in 2018/19. They were below 80% in four of the previous five years. The force has also seen a decrease year on year in the number of non-recording appeals received – from 424 in 2013/14 to 208 in 2018/19. In addition, the proportion of these appeals upheld by us has also reduced through that time period from 44% (168) in 2013/14 to 30% (58) in 2018/19.
- > Greater Manchester Police restructured its Professional Standards Branch. In October 2018, the force set up a new Assessment Team to record complaints and decide on initial actions. Their timeliness for recording complaints within ten days increased from 55% in 2017/18 to 99% in the final quarter of 2018/19.

Handling complaints

Forces handle complaints in different ways. Some have a professional standards department (PSD), which deals with only the most serious investigations¹⁴ and all other complaints are handled by the local police supervision. This term refers to operational police officers rather than police officers based in a PSD, who are dedicated to dealing with complaints. Other forces have PSDs that handle all complaints. Provided there are appropriate schemes of delegation, clear structures and quality checks in place, both options can and do work. Having local police supervision handle complaints allows learning to be identified at source and the local police may be able to give better insight to answer the complaint. When PSDs handle all complaints, this develops expertise among a dedicated team of complaints handlers, meaning that complaints are dealt with consistently and efficiently.

The use of local resolution to address complaints has risen steadily since the legislation that underpins the police complaints system changed in 2012/13. This change removed the requirement for complainants to consent to local resolution being used to deal with their complaint. It allowed complaint handlers to address complaints in a way that reflected their seriousness. In 2018/19, for the first time since 2008/09, more allegations were dealt with using local resolution than investigation¹⁵.

¹⁴ Those handled under special requirements ([see glossary of terms](#)).

¹⁵ A complaint can involve more than one allegation. Each allegation can be handled using a different process.

Figure 8: Rate of local resolution and investigation over time

Despite this increase in the number of allegations locally resolved, there has been no increase in the time it takes for forces to resolve these allegations. The rate at which appeals against local resolution are upheld by both the force and the IOPC has also not changed. This increased use of local resolution appears to accord with the refocusing of the complaints system on resolving and addressing systemic issues – forces are using a more timely, reasonable and proportionate way to address complaints that do not require a full investigative process.

- > Gwent Police takes an average of 35 days to locally resolve allegations. A force representative meets with complainants to make sure they fully understand what has happened and what action is appropriate to resolve it.
- > Nottinghamshire Police, which locally resolves allegations in an average of 58 days, has dedicated divisional sergeants for complaints handling.

As well as there being a drop in the number of allegations being investigated, there has also been a drop in the proportion of those allegations handled under special requirements – from 13% last year to 10% in 2018/19. This could also be indicative

of a drive to refocus away from blame and individual conduct – after conducting reviews of the number of formal misconduct notices they serve, several forces have concluded they are serving too many for matters that are very unlikely to result in disciplinary proceedings.

The number of investigation appeals, both to the force and the IOPC has fallen year on year since the change in legislation in 2012/13. A drop is to be expected given that fewer allegations are being investigated. In addition, we have carried out work with individual forces that have high levels of upheld appeals to address various issues. We have also [published guidance for forces](#) on carrying out good investigations into complaint allegations, and shared best practice on writing letters that inform complainants about the outcome of their complaint. Through our appeals work, but also through our oversight work, we see good examples of decision letters from forces that are clear, thorough and written in plain English. Such examples enable the complainant to understand the rationale behind the decision. We are upholding investigation appeals at the same rate in 2018/19 (38%) as in 2017/18. This is the lowest rate of upheld investigation appeals since 2011/12.

- > Both Avon and Somerset Police and North Wales Police conduct debriefs on cases where an appeal involving them is upheld by the IOPC. This enables them to learn from what has happened and apply it to future investigations.
- > As mentioned previously, Greater Manchester Police restructured its Professional Standards Branch and created a scheme of delegation to clarify roles and responsibilities in the department. There has also been a drive to change the ethos of the department and focus on customer service. The IOPC has upheld only 15 of the 54 (28%) investigation appeals completed in 2018/19. This is a vast improvement compared with 2016/17, when we upheld 31 of the 57 (54%) investigation appeals completed.

Since the change in legislation in 2012/13, the average time to investigate allegations has increased year on year from 124 days to 173 days in 2017/18. However, this year saw a reduction to 158 days. We also saw better than average timeliness in forces that investigate a high proportion of the complaints they handle. This reduction is not solely because they investigated fewer allegations during 2018/19.

- > Of all forces, Cheshire Constabulary completes investigations into complaint allegations most quickly, taking 87 days. In 2018/19, we upheld only three of the 12 appeals (25%) we received after Cheshire carried out an investigation into a complaint allegation. Officers tasked with investigating allegations have regular meetings and targets cases that are more than three months old.

Our oversight work with forces allows us to interpret the police complaints statistics and provide an insight into how well forces perform when handling complaints. We will continue to work with forces in 2019/20 to improve complaints handling within the current complaints framework, and to embed the changes in legislation scheduled to take effect in 2020.

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.

4

Tables

Table 1: Appeals completed and upheld in 2018/19 by appeal body and appeal type

| Appeal type | IOPC appeals | | | Chief officer appeals | | |
|------------------|-------------------------|---------------|----------|-------------------------|---------------|----------|
| | Number valid completed* | Number upheld | % upheld | Number valid completed* | Number upheld | % upheld |
| Non-recording** | 1,236 | 447 | 36 | | | |
| Local resolution | 70 | 47 | 67 | 2,416 | 379 | 16 |
| Investigation | 1,310 | 492 | 38 | 673 | 84 | 12 |
| Disapplication | 59 | 11 | 19 | 387 | 36 | 9 |
| Discontinuance | 2 | 0 | 0 | 10 | 4 | 40 |

*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'. In addition, 66 appeals completed by chief officers in 2018/19 were recorded on police force systems with a decision 'Upheld-NFA' or 'Upheld-Info only'. These decision values are not recognised in the data the IOPC receives from forces. Therefore, appeals with either of these decisions are not included in upheld and valid completed counts.

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

Table 2: Complaint cases recorded 2001/02 – 2018/19

| | 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 |
| Total recorded in year | 34,863 | 37,105 | 34,247 | 34,103 |
| % annual change | 15 | 6 | -8 | 0 |
| | 2017/18 | 2018/19 | | |
| Total recorded in year | 31,671 | 31,097 | | |
| % annual change | -7 | -2 | | |

*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 2018/19 and comparison with previous year

| Police force | 2017/18 | 2018/19 | Percentage change from 2017/18 |
|--------------------------|---------------|---------------|--------------------------------|
| Avon and Somerset | 919 | 871 | -5 |
| Bedfordshire | 442 | 352 | -20 |
| British Transport Police | 305 | 315 | 3 |
| Cambridgeshire | 328 | 338 | 3 |
| Cheshire | 524 | 423 | -19 |
| City of London | 233 | 68 | -71 |
| Cleveland | 487 | 473 | -3 |
| Cumbria | 335 | 300 | -10 |
| Derbyshire | 387 | 515 | 33 |
| Devon and Cornwall | 1,216 | 1,342 | 10 |
| Dorset | 537 | 540 | 1 |
| Durham | 330 | 355 | 8 |
| Dyfed-Powys | 313 | 291 | -7 |
| Essex | 602 | 624 | 4 |
| Gloucestershire | 403 | 387 | -4 |
| Greater Manchester | 1,518 | 1,571 | 3 |
| Gwent | 266 | 332 | 25 |
| Hampshire | 960 | 686 | -29 |
| Hertfordshire | 533 | 449 | -16 |
| Humberside | 908 | 860 | -5 |
| Kent | 721 | 751 | 4 |
| Lancashire | 756 | 559 | -26 |
| Leicestershire | 536 | 466 | -13 |
| Lincolnshire | 488 | 571 | 17 |
| Merseyside | 469 | 365 | -22 |
| Metropolitan | 5,071 | 5,418 | 7 |
| Norfolk | 461 | 360 | -22 |
| North Wales | 484 | 355 | -27 |
| North Yorkshire | 283 | 322 | 14 |
| Northamptonshire | 483 | 465 | -4 |
| Northumbria | 738 | 768 | 4 |
| Nottinghamshire | 871 | 1,012 | 16 |
| South Wales | 604 | 893 | 48 |
| South Yorkshire | 460 | 598 | 30 |
| Staffordshire | 433 | 496 | 15 |
| Suffolk | 337 | 281 | -17 |
| Surrey | 406 | 392 | -3 |
| Sussex | 1,127 | 883 | -22 |
| Thames Valley | 1,303 | 1,221 | -6 |
| Warwickshire | 328 | 274 | -16 |
| West Mercia | 686 | 713 | 4 |
| West Midlands | 777 | 501 | -36 |
| West Yorkshire | 1,708 | 1,737 | 2 |
| Wiltshire | 595 | 604 | 2 |
| Total | 31,671 | 31,097 | -2 |

Table 4: Complaint cases recorded in time 2014/15 to 2018/19 (continues on next page)

| Police force | 2014/15 | | 2015/16 | | 2016/17 | |
|--------------------------|---------------------------|--------------------------|---------------------------|--------------------------|---------------------------|--------------------------|
| | Complaint cases recorded* | % within 10 working days | Complaint cases recorded* | % within 10 working days | Complaint cases recorded* | % within 10 working days |
| Avon and Somerset | 1,322 | 94 | 1,158 | 94 | 1,019 | 97 |
| Bedfordshire | 401 | 91 | 363 | 93 | 488 | 90 |
| British Transport Police | 396 | 95 | 350 | 98 | 371 | 97 |
| Cambridgeshire | 461 | 90 | 367 | 94 | 383 | 91 |
| Cheshire | 579 | 99 | 537 | 96 | 595 | 96 |
| City of London | 256 | 96 | 261 | 94 | 276 | 99 |
| Cleveland | 501 | 91 | 609 | 75 | 454 | 84 |
| Cumbria | 302 | 80 | 307 | 89 | 307 | 86 |
| Derbyshire | 454 | 91 | 441 | 90 | 383 | 88 |
| Devon and Cornwall | 1,515 | 80 | 1,218 | 97 | 1,188 | 98 |
| Dorset | 453 | 98 | 489 | 93 | 506 | 94 |
| Durham | 314 | 90 | 399 | 94 | 314 | 93 |
| Dyfed-Powys | 268 | 73 | 256 | 94 | 274 | 91 |
| Essex | 1,153 | 92 | 945 | 93 | 806 | 91 |
| Gloucestershire | 438 | 95 | 381 | 92 | 431 | 95 |
| Greater Manchester | 1,890 | 47 | 1,616 | 89 | 1,537 | 82 |
| Gwent | 398 | 94 | 325 | 88 | 287 | 96 |
| Hampshire | 926 | 92 | 868 | 90 | 931 | 90 |
| Hertfordshire | 568 | 92 | 496 | 95 | 518 | 90 |
| Humberside | 521 | 77 | 529 | 73 | 760 | 61 |
| Kent | 1,187 | 94 | 842 | 88 | 762 | 95 |
| Lancashire | 1,031 | 82 | 884 | 79 | 997 | 89 |
| Leicestershire | 846 | 85 | 689 | 92 | 662 | 93 |
| Lincolnshire | 567 | 94 | 549 | 93 | 596 | 89 |
| Merseyside | 617 | 98 | 458 | 91 | 548 | 86 |
| Metropolitan | 6,828 | 68 | 6,293 | 86 | 5,836 | 63 |
| Norfolk | 449 | 96 | 413 | 95 | 416 | 93 |
| North Wales | 473 | 83 | 441 | 91 | 452 | 95 |
| North Yorkshire | 517 | 95 | 291 | 85 | 331 | 85 |
| Northamptonshire | 434 | 97 | 473 | 92 | 509 | 94 |
| Northumbria | 1,018 | 87 | 716 | 92 | 758 | 93 |
| Nottinghamshire | 1,023 | 95 | 967 | 95 | 670 | 94 |
| South Wales | 864 | 60 | 807 | 80 | 770 | 88 |
| South Yorkshire | 660 | 80 | 602 | 90 | 607 | 77 |
| Staffordshire | 516 | 89 | 410 | 89 | 421 | 84 |
| Suffolk | 328 | 96 | 289 | 97 | 317 | 92 |
| Surrey | 546 | 84 | 515 | 91 | 482 | 86 |
| Sussex | 943 | 69 | 916 | 77 | 935 | 72 |
| Thames Valley | 1,305 | 95 | 1,304 | 93 | 1,346 | 97 |
| Warwickshire | 200 | 84 | 259 | 80 | 415 | 95 |
| West Mercia | 513 | 76 | 509 | 80 | 733 | 95 |
| West Midlands | 1,145 | 44 | 1,168 | 73 | 882 | 43 |
| West Yorkshire | 1,255 | 80 | 1,867 | 94 | 2,167 | 96 |
| Wiltshire | 712 | 46 | 665 | 80 | 663 | 96 |
| Total | 37,093 | 80 | 34,242 | 88 | 34,103 | 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 within 10 working days 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 2014/15 to 2018/19 (continued)

| Police force | 2017/18 | | 2018/19 | |
|--------------------------|---------------------------|--------------------------|---------------------------|--------------------------|
| | Complaint cases recorded* | % within 10 working days | Complaint cases recorded* | % within 10 working days |
| Avon and Somerset | 919 | 97 | 871 | 98 |
| Bedfordshire | 442 | 92 | 352 | 93 |
| British Transport Police | 305 | 98 | 315 | 93 |
| Cambridgeshire | 328 | 88 | 338 | 96 |
| Cheshire | 524 | 96 | 423 | 97 |
| City of London | 233 | 98 | 68 | 85 |
| Cleveland | 487 | 88 | 473 | 93 |
| Cumbria | 335 | 86 | 300 | 93 |
| Derbyshire | 387 | 87 | 515 | 92 |
| Devon and Cornwall | 1,216 | 73 | 1,342 | 97 |
| Dorset | 537 | 94 | 540 | 95 |
| Durham | 330 | 89 | 355 | 96 |
| Dyfed-Powys | 313 | 93 | 291 | 97 |
| Essex | 602 | 93 | 624 | 95 |
| Gloucestershire | 403 | 92 | 387 | 70 |
| Greater Manchester | 1,518 | 55 | 1,571 | 88 |
| Gwent | 266 | 91 | 332 | 95 |
| Hampshire | 960 | 90 | 686 | 91 |
| Hertfordshire | 533 | 93 | 449 | 94 |
| Humberside | 908 | 57 | 860 | 79 |
| Kent | 721 | 91 | 751 | 96 |
| Lancashire | 756 | 85 | 559 | 77 |
| Leicestershire | 536 | 93 | 466 | 98 |
| Lincolnshire | 488 | 98 | 571 | 97 |
| Merseyside | 469 | 88 | 365 | 92 |
| Metropolitan | 5,071 | 77 | 5,418 | 90 |
| Norfolk | 461 | 87 | 360 | 90 |
| North Wales | 484 | 96 | 355 | 96 |
| North Yorkshire | 283 | 81 | 322 | 83 |
| Northamptonshire | 483 | 95 | 465 | 91 |
| Northumbria | 738 | 91 | 768 | 97 |
| Nottinghamshire | 871 | 96 | 1,012 | 92 |
| South Wales | 604 | 92 | 893 | 92 |
| South Yorkshire | 460 | 91 | 598 | 89 |
| Staffordshire | 433 | 88 | 496 | 82 |
| Suffolk | 337 | 87 | 281 | 91 |
| Surrey | 406 | 78 | 392 | 77 |
| Sussex | 1,127 | 80 | 883 | 85 |
| Thames Valley | 1,303 | 95 | 1,221 | 97 |
| Warwickshire | 328 | 91 | 274 | 93 |
| West Mercia | 686 | 86 | 713 | 92 |
| West Midlands | 777 | 31 | 501 | 26 |
| West Yorkshire | 1,708 | 96 | 1,737 | 93 |
| Wiltshire | 595 | 96 | 604 | 50 |
| Total | 31,671 | 84 | 31,097 | 89 |

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 2018/19 and comparison with previous year

| Police force | Number of allegations 2017/18 | Number of allegations 2018/19 | Change in number of allegations | % change from 2017/18 to 2018/19 |
|--------------------------|----------------------------------|----------------------------------|------------------------------------|-------------------------------------|
| Avon and Somerset | 1,861 | 1,846 | -15 | -1 |
| Bedfordshire | 956 | 904 | -52 | -5 |
| British Transport Police | 680 | 634 | -46 | -7 |
| Cambridgeshire | 791 | 783 | -8 | -1 |
| Cheshire | 1,134 | 1,033 | -101 | -9 |
| City of London | 326 | 170 | -156 | -48 |
| Cleveland | 823 | 725 | -98 | -12 |
| Cumbria | 474 | 455 | -19 | -4 |
| Derbyshire | 621 | 852 | 231 | 37 |
| Devon and Cornwall | 2,205 | 2,527 | 322 | 15 |
| Dorset | 710 | 753 | 43 | 6 |
| Durham | 530 | 559 | 29 | 5 |
| Dyfed-Powys | 581 | 538 | -43 | -7 |
| Essex | 1,391 | 1,531 | 140 | 10 |
| Gloucestershire | 787 | 737 | -50 | -6 |
| Greater Manchester | 2,486 | 2,697 | 211 | 8 |
| Gwent | 669 | 701 | 32 | 5 |
| Hampshire | 1,656 | 1,150 | -506 | -31 |
| Hertfordshire | 1,274 | 1,277 | 3 | 0 |
| Humberside | 1,472 | 1,261 | -211 | -14 |
| Kent | 1,250 | 1,363 | 113 | 9 |
| Lancashire | 1,609 | 1,020 | -589 | -37 |
| Leicestershire | 1,334 | 1,124 | -210 | -16 |
| Lincolnshire | 703 | 791 | 88 | 13 |
| Merseyside | 1,274 | 1,390 | 116 | 9 |
| Metropolitan | 12,607 | 11,085 | -1,522 | -12 |
| Norfolk | 852 | 760 | -92 | -11 |
| North Wales | 971 | 872 | -99 | -10 |
| North Yorkshire | 558 | 688 | 130 | 23 |
| Northamptonshire | 988 | 972 | -16 | -2 |
| Northumbria | 1,673 | 1,625 | -48 | -3 |
| Nottinghamshire | 1,329 | 1,569 | 240 | 18 |
| South Wales | 741 | 1,217 | 476 | 64 |
| South Yorkshire | 890 | 1,202 | 312 | 35 |
| Staffordshire | 859 | 1,008 | 149 | 17 |
| Suffolk | 598 | 636 | 38 | 6 |
| Surrey | 1,717 | 1,369 | -348 | -20 |
| Sussex | 1,561 | 1,319 | -242 | -16 |
| Thames Valley | 1,914 | 1,787 | -127 | -7 |
| Warwickshire | 394 | 333 | -61 | -15 |
| West Mercia | 886 | 839 | -47 | -5 |
| West Midlands | 1,753 | 1,030 | -723 | -41 |
| West Yorkshire | 2,541 | 2,528 | -13 | -1 |
| Wiltshire | 809 | 818 | 9 | 1 |
| Total | 61,238 | 58,478 | -2,760 | -5 |

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 2018/19

| Allegation groupings | Allegation category | N | % |
|-----------------------------------|---|---------------|------------|
| Oppressive behaviour | Serious non-sexual assault | 232 | 0 |
| | Sexual assault | 143 | 0 |
| | Other assault | 4,267 | 7 |
| | Oppressive conduct or harassment | 2,619 | 4 |
| | Unlawful/unnecessary arrest or detention | 2,006 | 3 |
| Malpractice | Irregularity in relation to evidence/perjury | 731 | 1 |
| | Corruption or malpractice | 624 | 1 |
| | Mishandling of property | 1,606 | 3 |
| Breach of PACE | Breach of Code A PACE on stop and search | 249 | 0 |
| | Breach of Code B PACE on searching of premises and seizure of property | 916 | 2 |
| | Breach of Code C PACE on detention, treatment and questioning | 2,006 | 3 |
| | Breach of Code D PACE on identification procedures | 18 | 0 |
| | Breach of Code E PACE on tape recording | 7 | 0 |
| | Unspecified breaches of PACE which cannot be allocated to a specific code | 68 | 0 |
| Lack of fairness and impartiality | Lack of fairness and impartiality | 2,873 | 5 |
| Discriminatory behaviour | Discriminatory behaviour | 1,580 | 3 |
| Other neglect of duty | Other neglect or failure in duty | 23,872 | 41 |
| Incivility | Incivility, impoliteness and intolerance | 6,796 | 12 |
| Traffic | Traffic irregularity | 434 | 1 |
| Other | Other irregularity in procedure | 3,213 | 5 |
| | Improper access and/or disclosure of information | 1,521 | 3 |
| | Other sexual conduct | 74 | 0 |
| | Other | 1,431 | 2 |
| Direction and control | General policing standards | 374 | 1 |
| | Operational management decisions | 118 | 0 |
| | Operational policing policies | 322 | 1 |
| | Organisational decisions | 378 | 1 |
| Total allegations | | 58,478 | 100 |

Table 7: Number of allegations recorded per 1,000 employees in 2018/19

| Police force | Allegations recorded against employees only | Number of employees* | Allegations per 1,000 employees |
|--------------------------|--|-----------------------------|--|
| Avon and Somerset | 1,806 | 5,508 | 328 |
| Bedfordshire | 877 | 2,350 | 373 |
| British Transport Police | 623 | 4,887 | 127 |
| Cambridgeshire | 769 | 2,527 | 304 |
| Cheshire | 1,025 | 3,900 | 263 |
| City of London | 145 | 1,214 | 119 |
| Cleveland | 686 | 1,743 | 394 |
| Cumbria | 378 | 1,857 | 204 |
| Derbyshire | 825 | 3,353 | 246 |
| Devon and Cornwall | 2,422 | 5,204 | 465 |
| Dorset | 750 | 2,621 | 286 |
| Durham | 556 | 2,214 | 251 |
| Dyfed-Powys | 529 | 2,062 | 257 |
| Essex | 1,508 | 5,459 | 276 |
| Gloucestershire | 727 | 1,996 | 364 |
| Greater Manchester | 2,694 | 10,801 | 249 |
| Gwent | 655 | 2,033 | 322 |
| Hampshire | 1,122 | 5,350 | 210 |
| Hertfordshire | 1,259 | 3,732 | 337 |
| Humberside | 1,233 | 3,348 | 368 |
| Kent | 1,334 | 6,035 | 221 |
| Lancashire | 1,010 | 5,364 | 188 |
| Leicestershire | 1,101 | 3,655 | 301 |
| Lincolnshire | 755 | 1,716 | 440 |
| Merseyside | 1,381 | 5,752 | 240 |
| Metropolitan | 10,938 | 42,573 | 257 |
| Norfolk | 759 | 2,879 | 264 |
| North Wales | 860 | 2,844 | 302 |
| North Yorkshire | 650 | 2,788 | 233 |
| Northamptonshire | 945 | 2,417 | 391 |
| Northumbria | 1,622 | 5,012 | 324 |
| Nottinghamshire | 1,485 | 3,435 | 432 |
| South Wales | 1,170 | 5,276 | 222 |
| South Yorkshire | 1,130 | 4,789 | 236 |
| Staffordshire | 982 | 3,285 | 299 |
| Suffolk | 634 | 2,178 | 291 |
| Surrey | 1,346 | 3,810 | 353 |
| Sussex | 1,289 | 4,762 | 271 |
| Thames Valley | 1,780 | 7,734 | 230 |
| Warwickshire | 323 | 1,709 | 189 |
| West Mercia | 819 | 3,953 | 207 |
| West Midlands | 978 | 10,564 | 93 |
| West Yorkshire | 2,520 | 9,429 | 267 |
| Wiltshire | 796 | 2,209 | 360 |
| Total | 57,196 | 216,327 | 264 |

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 2018*.

Table 8: Means by which allegations were finalised in 2018/19

| Police force | Local resolution | | Investigation | | Withdrawn | | Disapplication | | Discontinuance | | Unknown | | Total |
|--------------------------|------------------|-----------|---------------|-----------|--------------|----------|----------------|----------|----------------|----------|-----------|----------|---------------|
| | N | % | N | % | N | % | N | % | N | % | N | % | |
| Avon and Somerset | 957 | 58 | 465 | 28 | 61 | 4 | 163 | 10 | 7 | 0 | 0 | 0 | 1,653 |
| Bedfordshire | 375 | 42 | 430 | 48 | 44 | 5 | 48 | 5 | 6 | 1 | 0 | 0 | 903 |
| British Transport Police | 98 | 14 | 522 | 77 | 55 | 8 | 2 | 0 | 0 | 0 | 0 | 0 | 677 |
| Cambridgeshire | 371 | 49 | 314 | 42 | 47 | 6 | 15 | 2 | 7 | 1 | 0 | 0 | 754 |
| Cheshire | 448 | 45 | 484 | 48 | 54 | 5 | 13 | 1 | 6 | 1 | 0 | 0 | 1,005 |
| City of London | 58 | 36 | 81 | 51 | 7 | 4 | 8 | 5 | 5 | 3 | 0 | 0 | 159 |
| Cleveland | 588 | 73 | 116 | 14 | 14 | 2 | 61 | 8 | 24 | 3 | 0 | 0 | 803 |
| Cumbria | 282 | 60 | 160 | 34 | 6 | 1 | 10 | 2 | 13 | 3 | 0 | 0 | 471 |
| Derbyshire | 397 | 56 | 242 | 34 | 38 | 5 | 5 | 1 | 29 | 4 | 0 | 0 | 711 |
| Devon and Cornwall | 1,324 | 58 | 582 | 25 | 218 | 10 | 159 | 7 | 8 | 0 | 0 | 0 | 2,291 |
| Dorset | 386 | 57 | 136 | 20 | 47 | 7 | 101 | 15 | 13 | 2 | 0 | 0 | 683 |
| Durham | 274 | 51 | 179 | 33 | 22 | 4 | 64 | 12 | 3 | 1 | 0 | 0 | 542 |
| Dyfed-Powys | 254 | 45 | 252 | 45 | 25 | 4 | 20 | 4 | 9 | 2 | 0 | 0 | 560 |
| Essex | 653 | 47 | 575 | 41 | 110 | 8 | 56 | 4 | 2 | 0 | 0 | 0 | 1,396 |
| Gloucestershire | 436 | 72 | 61 | 10 | 21 | 3 | 77 | 13 | 7 | 1 | 0 | 0 | 602 |
| Greater Manchester | 1,794 | 64 | 629 | 22 | 194 | 7 | 147 | 5 | 25 | 1 | 11 | 0 | 2,800 |
| Gwent | 184 | 24 | 364 | 48 | 180 | 23 | 38 | 5 | 0 | 0 | 0 | 0 | 766 |
| Hampshire | 715 | 57 | 434 | 35 | 72 | 6 | 26 | 2 | 4 | 0 | 0 | 0 | 1,251 |
| Hertfordshire | 530 | 41 | 620 | 48 | 72 | 6 | 52 | 4 | 15 | 1 | 0 | 0 | 1,289 |
| Humberside | 806 | 68 | 181 | 15 | 145 | 12 | 52 | 4 | 2 | 0 | 0 | 0 | 1,186 |
| Kent | 655 | 48 | 386 | 29 | 164 | 12 | 146 | 11 | 0 | 0 | 0 | 0 | 1,351 |
| Lancashire | 521 | 47 | 363 | 33 | 74 | 7 | 112 | 10 | 27 | 2 | 0 | 0 | 1,097 |
| Leicestershire | 521 | 45 | 437 | 38 | 93 | 8 | 82 | 7 | 16 | 1 | 0 | 0 | 1,149 |
| Lincolnshire | 540 | 71 | 169 | 22 | 37 | 5 | 17 | 2 | 0 | 0 | 0 | 0 | 763 |
| Merseyside | 498 | 35 | 712 | 50 | 35 | 2 | 146 | 10 | 19 | 1 | 0 | 0 | 1,410 |
| Metropolitan | 2,326 | 24 | 6,445 | 66 | 601 | 6 | 391 | 4 | 16 | 0 | 1 | 0 | 9,780 |
| Norfolk | 357 | 46 | 308 | 39 | 50 | 6 | 62 | 8 | 4 | 1 | 0 | 0 | 781 |
| North Wales | 503 | 51 | 338 | 34 | 81 | 8 | 59 | 6 | 1 | 0 | 0 | 0 | 982 |
| North Yorkshire | 353 | 75 | 29 | 6 | 26 | 5 | 65 | 14 | 0 | 0 | 0 | 0 | 473 |
| Northamptonshire | 589 | 62 | 296 | 31 | 30 | 3 | 20 | 2 | 14 | 1 | 0 | 0 | 949 |
| Northumbria | 506 | 33 | 730 | 48 | 169 | 11 | 96 | 6 | 17 | 1 | 1 | 0 | 1,519 |
| Nottinghamshire | 913 | 69 | 286 | 22 | 59 | 4 | 47 | 4 | 17 | 1 | 0 | 0 | 1,322 |
| South Wales | 263 | 38 | 306 | 44 | 58 | 8 | 44 | 6 | 19 | 3 | 0 | 0 | 690 |
| South Yorkshire | 597 | 63 | 189 | 20 | 43 | 5 | 109 | 11 | 13 | 1 | 0 | 0 | 951 |
| Staffordshire | 429 | 44 | 458 | 47 | 72 | 7 | 13 | 1 | 7 | 1 | 0 | 0 | 979 |
| Suffolk | 230 | 40 | 266 | 46 | 54 | 9 | 30 | 5 | 0 | 0 | 0 | 0 | 580 |
| Surrey | 920 | 63 | 421 | 29 | 45 | 3 | 51 | 3 | 21 | 1 | 0 | 0 | 1,458 |
| Sussex | 812 | 64 | 217 | 17 | 76 | 6 | 163 | 13 | 1 | 0 | 0 | 0 | 1,269 |
| Thames Valley | 1,077 | 64 | 420 | 25 | 40 | 2 | 149 | 9 | 0 | 0 | 1 | 0 | 1,687 |
| Warwickshire | 123 | 44 | 129 | 46 | 14 | 5 | 11 | 4 | 4 | 1 | 0 | 0 | 281 |
| West Mercia | 313 | 47 | 296 | 44 | 39 | 6 | 16 | 2 | 8 | 1 | 0 | 0 | 672 |
| West Midlands | 591 | 44 | 618 | 46 | 33 | 2 | 81 | 6 | 10 | 1 | 0 | 0 | 1,333 |
| West Yorkshire | 1,263 | 53 | 945 | 39 | 131 | 5 | 61 | 3 | 2 | 0 | 0 | 0 | 2,402 |
| Wiltshire | 371 | 61 | 173 | 29 | 11 | 2 | 27 | 4 | 25 | 4 | 0 | 0 | 607 |
| Total | 26,201 | 48 | 21,764 | 40 | 3,467 | 6 | 3,115 | 6 | 426 | 1 | 14 | 0 | 54,987 |

Table 9: Time taken to finalise allegations in 2018/19

| 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 | 56 | 943 | 144 | 458 | 0 | 0 |
| Bedfordshire | 71 | 375 | 149 | 429 | 0 | 0 |
| British Transport Police | 27 | 98 | 129 | 519 | 0 | 0 |
| Cambridgeshire | 60 | 368 | 160 | 314 | 0 | 0 |
| Cheshire | 43 | 447 | 87 | 480 | 0 | 0 |
| City of London | 52 | 58 | 101 | 80 | 0 | 0 |
| Cleveland | 83 | 588 | 235 | 116 | 0 | 0 |
| Cumbria | 42 | 282 | 164 | 160 | 0 | 0 |
| Derbyshire | 67 | 397 | 173 | 242 | 0 | 0 |
| Devon and Cornwall | 72 | 1,320 | 214 | 575 | 0 | 0 |
| Dorset | 56 | 385 | 177 | 127 | 0 | 0 |
| Durham | 57 | 273 | 166 | 179 | 0 | 0 |
| Dyfed-Powys | 65 | 254 | 149 | 252 | 0 | 0 |
| Essex | 68 | 648 | 148 | 569 | 0 | 0 |
| Gloucestershire | 79 | 436 | 216 | 50 | 0 | 0 |
| Greater Manchester | 118 | 1,793 | 206 | 603 | 0 | 0 |
| Gwent | 35 | 184 | 100 | 321 | 0 | 0 |
| Hampshire | 92 | 715 | 130 | 431 | 0 | 0 |
| Hertfordshire | 57 | 528 | 122 | 618 | 0 | 0 |
| Humberside | 116 | 806 | 195 | 181 | 0 | 0 |
| Kent | 60 | 653 | 153 | 377 | 0 | 0 |
| Lancashire | 111 | 521 | 246 | 359 | 0 | 0 |
| Leicestershire | 56 | 521 | 158 | 437 | 0 | 0 |
| Lincolnshire | 85 | 540 | 169 | 138 | 0 | 0 |
| Merseyside | 64 | 498 | 155 | 702 | 0 | 0 |
| Metropolitan | 59 | 2,169 | 150 | 4,233 | 0 | 0 |
| Norfolk | 100 | 357 | 144 | 308 | 0 | 0 |
| North Wales | 78 | 503 | 203 | 336 | 0 | 0 |
| North Yorkshire | 85 | 353 | 214 | 27 | 0 | 0 |
| Northamptonshire | 49 | 589 | 213 | 282 | 0 | 0 |
| Northumbria | 61 | 506 | 143 | 729 | 0 | 0 |
| Nottinghamshire | 58 | 913 | 117 | 285 | 0 | 0 |
| South Wales | 66 | 261 | 118 | 303 | 0 | 0 |
| South Yorkshire | 66 | 596 | 216 | 152 | 0 | 0 |
| Staffordshire | 77 | 429 | 166 | 452 | 0 | 0 |
| Suffolk | 101 | 230 | 141 | 261 | 0 | 0 |
| Surrey | 74 | 920 | 179 | 421 | 0 | 0 |
| Sussex | 62 | 806 | 118 | 196 | 942 | 5 |
| Thames Valley | 81 | 1,077 | 142 | 399 | 0 | 0 |
| Warwickshire | 68 | 123 | 117 | 129 | 0 | 0 |
| West Mercia | 65 | 313 | 134 | 294 | 0 | 0 |
| West Midlands | 89 | 588 | 289 | 588 | 0 | 0 |
| West Yorkshire | 35 | 1,262 | 127 | 938 | 0 | 0 |
| Wiltshire | 100 | 371 | 219 | 172 | 0 | 0 |
| Total | 72 | 25,997 | 158 | 19,222 | 942 | 5 |

Table 10: Allegations finalised by investigation in 2018/19

| Police force | Not subject to special requirements | | Subject to special requirements* | | Total investigated |
|--------------------------|-------------------------------------|-----------|----------------------------------|-----------|--------------------|
| | N | % | N | % | N |
| Avon and Somerset | 410 | 88 | 55 | 12 | 465 |
| Bedfordshire | 399 | 93 | 31 | 7 | 430 |
| British Transport Police | 324 | 62 | 198 | 38 | 522 |
| Cambridgeshire | 312 | 99 | 2 | 1 | 314 |
| Cheshire | 472 | 98 | 12 | 2 | 484 |
| City of London | 79 | 98 | 2 | 2 | 81 |
| Cleveland | 101 | 87 | 15 | 13 | 116 |
| Cumbria | 156 | 98 | 4 | 3 | 160 |
| Derbyshire | 237 | 98 | 5 | 2 | 242 |
| Devon and Cornwall | 501 | 86 | 81 | 14 | 582 |
| Dorset | 120 | 88 | 16 | 12 | 136 |
| Durham | 168 | 94 | 11 | 6 | 179 |
| Dyfed-Powys | 252 | 100 | 0 | 0 | 252 |
| Essex | 531 | 92 | 44 | 8 | 575 |
| Gloucestershire | 38 | 62 | 23 | 38 | 61 |
| Greater Manchester | 490 | 78 | 139 | 22 | 629 |
| Gwent | 331 | 91 | 33 | 9 | 364 |
| Hampshire | 418 | 96 | 16 | 4 | 434 |
| Hertfordshire | 610 | 98 | 10 | 2 | 620 |
| Humberside | 179 | 99 | 2 | 1 | 181 |
| Kent | 358 | 93 | 28 | 7 | 386 |
| Lancashire | 348 | 96 | 15 | 4 | 363 |
| Leicestershire | 400 | 92 | 37 | 8 | 437 |
| Lincolnshire | 156 | 92 | 13 | 8 | 169 |
| Merseyside | 683 | 96 | 29 | 4 | 712 |
| Metropolitan | 5,754 | 89 | 691 | 11 | 6,445 |
| Norfolk | 297 | 96 | 11 | 4 | 308 |
| North Wales | 331 | 98 | 7 | 2 | 338 |
| North Yorkshire | 12 | 41 | 17 | 59 | 29 |
| Northamptonshire | 227 | 77 | 69 | 23 | 296 |
| Northumbria | 610 | 84 | 120 | 16 | 730 |
| Nottinghamshire | 254 | 89 | 32 | 11 | 286 |
| South Wales | 255 | 83 | 51 | 17 | 306 |
| South Yorkshire | 110 | 58 | 79 | 42 | 189 |
| Staffordshire | 399 | 87 | 59 | 13 | 458 |
| Suffolk | 253 | 95 | 13 | 5 | 266 |
| Surrey | 403 | 96 | 18 | 4 | 421 |
| Sussex | 178 | 82 | 39 | 18 | 217 |
| Thames Valley | 364 | 87 | 56 | 13 | 420 |
| Warwickshire | 110 | 85 | 19 | 15 | 129 |
| West Mercia | 227 | 77 | 69 | 23 | 296 |
| West Midlands | 564 | 91 | 54 | 9 | 618 |
| West Yorkshire | 922 | 98 | 23 | 2 | 945 |
| Wiltshire | 159 | 92 | 14 | 8 | 173 |
| Total | 19,502 | 90 | 2,262 | 10 | 21,764 |

*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 2018/19

| Police force | Not upheld | | Upheld | | Total investigated not subject to special requirements* |
|--------------------------|---------------|-----------|--------------|-----------|---|
| | N | % | N | % | N |
| Avon and Somerset | 377 | 92 | 33 | 8 | 410 |
| Bedfordshire | 375 | 94 | 24 | 6 | 399 |
| British Transport Police | 254 | 78 | 70 | 22 | 324 |
| Cambridgeshire | 279 | 89 | 33 | 11 | 312 |
| Cheshire | 395 | 84 | 77 | 16 | 472 |
| City of London | 70 | 89 | 9 | 11 | 79 |
| Cleveland | 80 | 79 | 21 | 21 | 101 |
| Cumbria | 119 | 76 | 37 | 24 | 156 |
| Derbyshire | 217 | 92 | 20 | 8 | 237 |
| Devon and Cornwall | 432 | 86 | 69 | 14 | 501 |
| Dorset | 107 | 89 | 13 | 11 | 120 |
| Durham | 140 | 83 | 28 | 17 | 168 |
| Dyfed-Powys | 198 | 79 | 54 | 21 | 252 |
| Essex | 434 | 82 | 97 | 18 | 531 |
| Gloucestershire | 35 | 92 | 3 | 8 | 38 |
| Greater Manchester | 474 | 97 | 16 | 3 | 490 |
| Gwent | 242 | 73 | 89 | 27 | 331 |
| Hampshire | 379 | 91 | 39 | 9 | 418 |
| Hertfordshire | 567 | 93 | 43 | 7 | 610 |
| Humberside | 169 | 94 | 10 | 6 | 179 |
| Kent | 275 | 77 | 83 | 23 | 358 |
| Lancashire | 323 | 93 | 25 | 7 | 348 |
| Leicestershire | 357 | 89 | 43 | 11 | 400 |
| Lincolnshire | 140 | 90 | 16 | 10 | 156 |
| Merseyside | 624 | 91 | 59 | 9 | 683 |
| Metropolitan | 5,212 | 91 | 542 | 9 | 5,754 |
| Norfolk | 255 | 86 | 42 | 14 | 297 |
| North Wales | 283 | 85 | 48 | 15 | 331 |
| North Yorkshire | 10 | 83 | 2 | 17 | 12 |
| Northamptonshire | 187 | 82 | 40 | 18 | 227 |
| Northumbria | 526 | 86 | 84 | 14 | 610 |
| Nottinghamshire | 247 | 97 | 7 | 3 | 254 |
| South Wales | 215 | 84 | 40 | 16 | 255 |
| South Yorkshire | 92 | 84 | 18 | 16 | 110 |
| Staffordshire | 339 | 85 | 60 | 15 | 399 |
| Suffolk | 197 | 78 | 56 | 22 | 253 |
| Surrey | 344 | 85 | 59 | 15 | 403 |
| Sussex | 169 | 95 | 9 | 5 | 178 |
| Thames Valley | 322 | 88 | 42 | 12 | 364 |
| Warwickshire | 81 | 74 | 29 | 26 | 110 |
| West Mercia | 188 | 83 | 39 | 17 | 227 |
| West Midlands | 491 | 87 | 73 | 13 | 564 |
| West Yorkshire | 783 | 85 | 139 | 15 | 922 |
| Wiltshire | 139 | 87 | 20 | 13 | 159 |
| Total | 17,142 | 88 | 2,360 | 12 | 19,502 |

*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 2018/19

| Allegation groupings | Allegation category | Not subject to special requirements | | Subject to special requirements* | | Total investigated |
|-----------------------------------|---|-------------------------------------|-----------|----------------------------------|-----------|--------------------|
| | | N | % | N | % | N |
| Oppressive behaviour | Serious non-sexual assault | 112 | 66 | 58 | 34 | 170 |
| | Sexual assault | 69 | 70 | 29 | 30 | 98 |
| | Other assault | 2,072 | 82 | 449 | 18 | 2,521 |
| | Oppressive conduct or harassment | 959 | 89 | 116 | 11 | 1,075 |
| | Unlawful/unnecessary arrest or detention | 978 | 89 | 127 | 11 | 1,105 |
| Malpractice | Irregularity in relation to evidence/perjury | 408 | 83 | 85 | 17 | 493 |
| | Corruption or malpractice | 289 | 81 | 68 | 19 | 357 |
| | Mishandling of property | 553 | 92 | 45 | 8 | 598 |
| Breach of PACE | Breach of Code A PACE on stop and search | 107 | 85 | 19 | 15 | 126 |
| | Breach of Code B PACE on searching of premises and seizure of property | 353 | 94 | 24 | 6 | 377 |
| | Breach of Code C PACE on detention, treatment and questioning | 1,036 | 95 | 60 | 5 | 1,096 |
| | Breach of Code D PACE on identification procedures | 7 | 88 | 1 | 13 | 8 |
| | Breach of Code E PACE on tape recording | 8 | 100 | 0 | 0 | 8 |
| | Unspecified breaches of PACE which cannot be allocated to a specific code | 17 | 81 | 4 | 19 | 21 |
| Lack of fairness and impartiality | Lack of fairness and impartiality | 893 | 93 | 71 | 7 | 964 |
| Discriminatory behaviour | Discriminatory behaviour | 854 | 89 | 110 | 11 | 964 |
| Other neglect of duty | Other neglect or Failure in duty | 6,376 | 93 | 488 | 7 | 6,864 |
| Incivility | Incivility, impoliteness and intolerance | 1,668 | 92 | 146 | 8 | 1,814 |
| Traffic | Traffic Irregularity | 84 | 80 | 21 | 20 | 105 |
| Other | Other irregularity in procedure | 1,135 | 90 | 122 | 10 | 1,257 |
| | Improper access and/or disclosure of information | 585 | 84 | 114 | 16 | 699 |
| | Other sexual conduct | 18 | 37 | 31 | 63 | 49 |
| | Other | 558 | 88 | 74 | 12 | 632 |
| Direction and control** | General policing standards | 99 | 100 | | | 99 |
| | Operational management decisions | 33 | 100 | | | 33 |
| | Operational policing policies | 115 | 100 | | | 115 |
| | Organisational decisions | 116 | 100 | | | 116 |
| Total allegations | | 19,502 | 90 | 2,262 | 10 | 21,764 |

*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 2018/19

| Allegation groupings | Allegation category | Not upheld | | Upheld | | Total investigated not subject to special requirements* |
|-----------------------------------|---|---------------|-----------|--------------|-----------|---|
| | | N | % | N | % | N |
| Oppressive behaviour | Serious non-sexual assault | 108 | 96 | 4 | 4 | 112 |
| | Sexual assault | 67 | 97 | 2 | 3 | 69 |
| | Other assault | 2,009 | 97 | 63 | 3 | 2,072 |
| | Oppressive conduct or harassment | 901 | 94 | 58 | 6 | 959 |
| | Unlawful/unnecessary arrest or detention | 928 | 95 | 50 | 5 | 978 |
| Malpractice | Irregularity in relation to evidence/perjury | 378 | 93 | 30 | 7 | 408 |
| | Corruption or malpractice | 284 | 98 | 5 | 2 | 289 |
| | Mishandling of property | 466 | 84 | 87 | 16 | 553 |
| Breach of PACE | Breach of Code A PACE on stop and search | 93 | 87 | 14 | 13 | 107 |
| | Breach of Code B PACE on searching of premises and seizure of property | 315 | 89 | 38 | 11 | 353 |
| | Breach of Code C PACE on detention, treatment and questioning | 920 | 89 | 116 | 11 | 1,036 |
| | Breach of Code D PACE on identification procedures | 6 | 86 | 1 | 14 | 7 |
| | Breach of Code E PACE on tape recording | 7 | 88 | 1 | 13 | 8 |
| | Unspecified breaches of PACE which cannot be allocated to a specific code | 15 | 88 | 2 | 12 | 17 |
| Lack of fairness and impartiality | Lack of fairness and impartiality | 813 | 91 | 80 | 9 | 893 |
| Discriminatory behaviour | Discriminatory behaviour | 836 | 98 | 18 | 2 | 854 |
| Other neglect of duty | Other neglect or Failure in duty | 5,177 | 81 | 1,199 | 19 | 6,376 |
| Incivility | Incivility, impoliteness and intolerance | 1,455 | 87 | 213 | 13 | 1,668 |
| Traffic | Traffic Irregularity | 63 | 75 | 21 | 25 | 84 |
| Other | Other irregularity in procedure | 1,000 | 88 | 135 | 12 | 1,135 |
| | Improper access and/or disclosure of information | 458 | 78 | 127 | 22 | 585 |
| | Other sexual conduct | 11 | 61 | 7 | 39 | 18 |
| | Other | 511 | 92 | 47 | 8 | 558 |
| Direction and control** | General policing standards | 85 | 86 | 14 | 14 | 99 |
| | Operational management decisions | 29 | 88 | 4 | 12 | 33 |
| | Operational policing policies | 104 | 90 | 11 | 10 | 115 |
| | Organisational decisions | 103 | 89 | 13 | 11 | 116 |
| Total allegations | | 17,142 | 88 | 2,360 | 12 | 19,502 |

*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 2018/19

| 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 | 837 | 64 | 64 |
| Bedfordshire | 362 | 102 | 110 |
| British Transport Police | 319 | 88 | 100 |
| Cambridgeshire | 313 | 96 | 105 |
| Cheshire | 431 | 57 | 68 |
| City of London | 69 | 65 | 84 |
| Cleveland | 515 | 78 | 88 |
| Cumbria | 325 | 72 | 75 |
| Derbyshire | 417 | 85 | 85 |
| Devon and Cornwall | 1,849 | 148 | 153 |
| Dorset | 514 | 70 | 84 |
| Durham | 332 | 66 | 70 |
| Dyfed-Powys | 288 | 101 | 105 |
| Essex | 684 | 105 | 117 |
| Gloucestershire | 337 | 105 | 120 |
| Greater Manchester | 1,687 | 150 | 151 |
| Gwent | 358 | 63 | 72 |
| Hampshire | 714 | 87 | 91 |
| Hertfordshire | 491 | 88 | 99 |
| Humberside | 821 | 113 | 120 |
| Kent | 769 | 107 | 110 |
| Lancashire | 587 | 175 | 190 |
| Leicestershire | 475 | 88 | 95 |
| Lincolnshire | 499 | 87 | 92 |
| Merseyside | 434 | 100 | 116 |
| Metropolitan | 3,769 | 107 | 115 |
| Norfolk | 458 | 121 | 142 |
| North Wales | 417 | 102 | 105 |
| North Yorkshire | 269 | 105 | 107 |
| Northamptonshire | 457 | 91 | 96 |
| Northumbria | 718 | 105 | 110 |
| Nottinghamshire | 823 | 80 | 84 |
| South Wales | 502 | 86 | 91 |
| South Yorkshire | 524 | 102 | 112 |
| Staffordshire | 486 | 83 | 85 |
| Suffolk | 296 | 107 | 123 |
| Surrey | 365 | 70 | 74 |
| Sussex | 965 | 102 | 109 |
| Thames Valley | 1,099 | 79 | 89 |
| Warwickshire | 256 | 108 | 122 |
| West Mercia | 586 | 102 | 109 |
| West Midlands | 641 | 192 | 198 |
| West Yorkshire | 1,545 | 75 | 79 |
| Wiltshire | 407 | 110 | 115 |
| Total | 29,010 | 103 | 110 |

*The number of complaint cases presented in this table are only those with valid days 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 2014/15 to 2018/19

| Chief officer local resolution appeals | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 |
|---|----------------|----------------|----------------|----------------|----------------|
| Received | 1,507 | 1,806 | 2,251 | 2,278 | 2,697 |
| Valid completed | 1,305 | 1,509 | 1,948 | 2,068 | 2,416 |
| Upheld | 214 | 256 | 328 | 321 | 379 |
| % Upheld | 16 | 17 | 17 | 16 | 16 |

| Chief officer investigation appeals | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 |
|--|----------------|----------------|----------------|----------------|----------------|
| Received | 1,898 | 1,521 | 1,204 | 922 | 695 |
| Valid completed | 1,563 | 1,356 | 1,103 | 1,039 | 673 |
| Upheld | 302 | 260 | 196 | 167 | 84 |
| % Upheld | 19 | 19 | 18 | 16 | 12 |

| Chief officer disapplication appeals | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 |
|---|----------------|----------------|----------------|----------------|----------------|
| Received | 409 | 402 | 404 | 365 | 406 |
| Valid completed | 340 | 392 | 351 | 344 | 387 |
| Upheld | 24 | 34 | 30 | 26 | 36 |
| % Upheld | 7 | 9 | 9 | 8 | 9 |

| Chief officer discontinuance appeals | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 |
|---|----------------|----------------|----------------|----------------|----------------|
| Received | 12 | 7 | 5 | 13 | 10 |
| Valid completed | 4 | 6 | 4 | 12 | 10 |
| Upheld | 1 | 2 | 2 | 0 | 4 |
| % Upheld | 25 | 33 | 50 | 0 | 40 |

| Total chief officer appeals | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 |
|------------------------------------|----------------|----------------|----------------|----------------|----------------|
| Received | 3,826 | 3,736 | 3,864 | 3,578 | 3,808 |
| Valid completed | 3,212 | 3,263 | 3,406 | 3,463 | 3,486 |
| Upheld | 541 | 552 | 556 | 514 | 503 |
| % Upheld | 17 | 17 | 16 | 15 | 14 |

'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'. In addition, 66 appeals completed in 2018/19 were recorded on police force systems with a decision 'Upheld-NFA' or 'Upheld-Info only'. These decision values are not recognised in the data the IOPC receives from forces. Therefore, appeals with either of these decisions are not included in upheld and valid completed counts.

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 2018/19

| 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 | 124 | 70 | 22 | 13 | 29 | 16 | 1 | 1 | 176 |
| Bedfordshire | 31 | 100 | 0 | 0 | 0 | 0 | 0 | 0 | 31 |
| British Transport Police | 5 | 19 | 21 | 81 | 0 | 0 | 0 | 0 | 26 |
| Cambridgeshire | 38 | 95 | 1 | 3 | 1 | 3 | 0 | 0 | 40 |
| Cheshire | 36 | 44 | 41 | 51 | 4 | 5 | 0 | 0 | 81 |
| City of London | 1 | 20 | 4 | 80 | 0 | 0 | 0 | 0 | 5 |
| Cleveland | 46 | 75 | 7 | 11 | 7 | 11 | 1 | 2 | 61 |
| Cumbria | 23 | 66 | 11 | 31 | 1 | 3 | 0 | 0 | 35 |
| Derbyshire | 45 | 76 | 14 | 24 | 0 | 0 | 0 | 0 | 59 |
| Devon and Cornwall | 100 | 72 | 21 | 15 | 17 | 12 | 1 | 1 | 139 |
| Dorset | 44 | 63 | 15 | 21 | 10 | 14 | 1 | 1 | 70 |
| Durham | 14 | 54 | 7 | 27 | 5 | 19 | 0 | 0 | 26 |
| Dyfed-Powys | 41 | 93 | 1 | 2 | 2 | 5 | 0 | 0 | 44 |
| Essex | 59 | 77 | 7 | 9 | 10 | 13 | 1 | 1 | 77 |
| Gloucestershire | 45 | 85 | 4 | 8 | 4 | 8 | 0 | 0 | 53 |
| Greater Manchester | 170 | 83 | 11 | 5 | 22 | 11 | 1 | 0 | 204 |
| Gwent | 13 | 29 | 26 | 58 | 6 | 13 | 0 | 0 | 45 |
| Hampshire | 92 | 71 | 29 | 22 | 8 | 6 | 0 | 0 | 129 |
| Hertfordshire | 54 | 90 | 1 | 2 | 5 | 8 | 0 | 0 | 60 |
| Humberside | 74 | 91 | 4 | 5 | 3 | 4 | 0 | 0 | 81 |
| Kent | 70 | 74 | 3 | 3 | 21 | 22 | 0 | 0 | 94 |
| Lancashire | 69 | 90 | 1 | 1 | 7 | 9 | 0 | 0 | 77 |
| Leicestershire | 40 | 85 | 0 | 0 | 7 | 15 | 0 | 0 | 47 |
| Lincolnshire | 44 | 94 | 0 | 0 | 3 | 6 | 0 | 0 | 47 |
| Merseyside | 68 | 59 | 32 | 28 | 16 | 14 | 0 | 0 | 116 |
| Metropolitan | 211 | 64 | 75 | 23 | 43 | 13 | 1 | 0 | 330 |
| Norfolk | 43 | 68 | 9 | 14 | 10 | 16 | 1 | 2 | 63 |
| North Wales | 39 | 72 | 12 | 22 | 3 | 6 | 0 | 0 | 54 |
| North Yorkshire | 37 | 79 | 0 | 0 | 10 | 21 | 0 | 0 | 47 |
| Northamptonshire | 73 | 94 | 0 | 0 | 5 | 6 | 0 | 0 | 78 |
| Northumbria | 25 | 25 | 55 | 54 | 21 | 21 | 0 | 0 | 101 |
| Nottinghamshire | 88 | 91 | 2 | 2 | 7 | 7 | 0 | 0 | 97 |
| South Wales | 10 | 14 | 43 | 61 | 16 | 23 | 1 | 1 | 70 |
| South Yorkshire | 59 | 79 | 2 | 3 | 14 | 19 | 0 | 0 | 75 |
| Staffordshire | 46 | 52 | 37 | 42 | 4 | 5 | 1 | 1 | 88 |
| Suffolk | 27 | 63 | 11 | 26 | 5 | 12 | 0 | 0 | 43 |
| Surrey | 53 | 68 | 21 | 27 | 4 | 5 | 0 | 0 | 78 |
| Sussex | 101 | 76 | 10 | 8 | 22 | 17 | 0 | 0 | 133 |
| Thames Valley | 139 | 72 | 26 | 13 | 28 | 15 | 0 | 0 | 193 |
| Warwickshire | 8 | 29 | 20 | 71 | 0 | 0 | 0 | 0 | 28 |
| West Mercia | 19 | 24 | 53 | 68 | 6 | 8 | 0 | 0 | 78 |
| West Midlands | 92 | 69 | 32 | 24 | 10 | 7 | 0 | 0 | 134 |
| West Yorkshire | 256 | 97 | 1 | 0 | 7 | 3 | 0 | 0 | 264 |
| Wiltshire | 25 | 81 | 3 | 10 | 3 | 10 | 0 | 0 | 31 |
| Total | 2,697 | 71 | 695 | 18 | 406 | 11 | 10 | 0 | 3,808 |

'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 chief officers 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 2018/19 (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 | 110 | 18 | 16 | 16 | 1 | 6 | 27 | 1 | 4 |
| Bedfordshire | 33 | 5 | 15 | 0 | 0 | - | 0 | 0 | - |
| British Transport Police | 5 | 2 | 40 | 15 | 2 | 13 | 0 | 0 | - |
| Cambridgeshire | 34 | 3 | 9 | 2 | 1 | 50 | 1 | 0 | 0 |
| Cheshire | 38 | 4 | 11 | 43 | 9 | 21 | 3 | 1 | 33 |
| City of London | 0 | 0 | - | 4 | 0 | 0 | 0 | 0 | - |
| Cleveland | 39 | 6 | 15 | 6 | 0 | 0 | 8 | 1 | 13 |
| Cumbria | 27 | 3 | 11 | 12 | 1 | 8 | 1 | 0 | 0 |
| Derbyshire | 41 | 2 | 5 | 6 | 0 | 0 | 0 | 0 | - |
| Devon and Cornwall | 99 | 22 | 22 | 21 | 3 | 14 | 18 | 1 | 6 |
| Dorset | 48 | 18 | 38 | 17 | 1 | 6 | 9 | 1 | 11 |
| Durham | 16 | 2 | 13 | 6 | 0 | 0 | 4 | 1 | 25 |
| Dyfed-Powys | 36 | 2 | 6 | 3 | 1 | 33 | 4 | 0 | 0 |
| Essex | 51 | 17 | 33 | 9 | 0 | 0 | 9 | 4 | 44 |
| Gloucestershire | 48 | 8 | 17 | 5 | 0 | 0 | 6 | 1 | 17 |
| Greater Manchester | 168 | 17 | 10 | 10 | 1 | 10 | 28 | 1 | 4 |
| Gwent | 12 | 5 | 42 | 22 | 2 | 9 | 5 | 1 | 20 |
| Hampshire | 87 | 10 | 11 | 28 | 3 | 11 | 5 | 0 | 0 |
| Hertfordshire | 60 | 5 | 8 | 1 | 0 | 0 | 5 | 0 | 0 |
| Humberside | 61 | 2 | 3 | 5 | 0 | 0 | 3 | 1 | 33 |
| Kent | 74 | 14 | 19 | 2 | 0 | 0 | 18 | 5 | 28 |
| Lancashire | 81 | 5 | 6 | 1 | 0 | 0 | 15 | 1 | 7 |
| Leicestershire | 39 | 0 | 0 | 0 | 0 | - | 7 | 0 | 0 |
| Lincolnshire | 43 | 8 | 19 | 3 | 0 | 0 | 3 | 0 | 0 |
| Merseyside | 62 | 6 | 10 | 24 | 3 | 13 | 13 | 0 | 0 |
| Metropolitan | 126 | 61 | 48 | 89 | 21 | 24 | 27 | 4 | 15 |
| Norfolk | 40 | 4 | 10 | 9 | 5 | 56 | 11 | 2 | 18 |
| North Wales | 29 | 3 | 10 | 10 | 2 | 20 | 4 | 0 | 0 |
| North Yorkshire | 37 | 9 | 24 | 0 | 0 | - | 9 | 1 | 11 |
| Northamptonshire | 72 | 16 | 22 | 0 | 0 | - | 5 | 0 | 0 |
| Northumbria | 25 | 2 | 8 | 40 | 3 | 8 | 19 | 1 | 5 |
| Nottinghamshire | 59 | 9 | 15 | 3 | 0 | 0 | 6 | 1 | 17 |
| South Wales | 7 | 2 | 29 | 38 | 4 | 11 | 17 | 2 | 12 |
| South Yorkshire | 57 | 5 | 9 | 2 | 0 | 0 | 16 | 0 | 0 |
| Staffordshire | 43 | 5 | 12 | 31 | 4 | 13 | 4 | 0 | 0 |
| Suffolk | 28 | 6 | 21 | 9 | 1 | 11 | 6 | 0 | 0 |
| Surrey | 48 | 5 | 10 | 18 | 2 | 11 | 4 | 0 | 0 |
| Sussex | 105 | 6 | 6 | 9 | 0 | 0 | 21 | 2 | 10 |
| Thames Valley | 120 | 9 | 8 | 22 | 1 | 5 | 24 | 1 | 4 |
| Warwickshire | 7 | 0 | 0 | 17 | 4 | 24 | 1 | 0 | 0 |
| West Mercia | 16 | 0 | 0 | 42 | 1 | 2 | 6 | 1 | 17 |
| West Midlands | 53 | 7 | 13 | 71 | 7 | 10 | 10 | 0 | 0 |
| West Yorkshire | 213 | 40 | 19 | 0 | 0 | - | 4 | 1 | 25 |
| Wiltshire | 19 | 6 | 32 | 2 | 1 | 50 | 1 | 0 | 0 |
| Total | 2,416 | 379 | 16 | 673 | 84 | 12 | 387 | 36 | 9 |

Table 15: Outcome of appeals completed by chief officers in 2018/19 (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 | 1 | 0 | 0 | 154 | 20 | 13 |
| Bedfordshire | 0 | 0 | - | 33 | 5 | 15 |
| British Transport Police | 0 | 0 | - | 20 | 4 | 20 |
| Cambridgeshire | 0 | 0 | - | 37 | 4 | 11 |
| Cheshire | 0 | 0 | - | 84 | 14 | 17 |
| City of London | 0 | 0 | - | 4 | 0 | 0 |
| Cleveland | 1 | 0 | 0 | 54 | 7 | 13 |
| Cumbria | 0 | 0 | - | 40 | 4 | 10 |
| Derbyshire | 0 | 0 | - | 47 | 2 | 4 |
| Devon and Cornwall | 0 | 0 | - | 138 | 26 | 19 |
| Dorset | 1 | 1 | 100 | 75 | 21 | 28 |
| Durham | 0 | 0 | - | 26 | 3 | 12 |
| Dyfed-Powys | 0 | 0 | - | 43 | 3 | 7 |
| Essex | 1 | 0 | 0 | 70 | 21 | 30 |
| Gloucestershire | 0 | 0 | - | 59 | 9 | 15 |
| Greater Manchester | 1 | 1 | 100 | 207 | 20 | 10 |
| Gwent | 0 | 0 | - | 39 | 8 | 21 |
| Hampshire | 0 | 0 | - | 120 | 13 | 11 |
| Hertfordshire | 0 | 0 | - | 66 | 5 | 8 |
| Humberside | 0 | 0 | - | 69 | 3 | 4 |
| Kent | 0 | 0 | - | 94 | 19 | 20 |
| Lancashire | 1 | 1 | 100 | 98 | 7 | 7 |
| Leicestershire | 0 | 0 | - | 46 | 0 | 0 |
| Lincolnshire | 0 | 0 | - | 49 | 8 | 16 |
| Merseyside | 0 | 0 | - | 99 | 9 | 9 |
| Metropolitan | 1 | 0 | 0 | 243 | 86 | 35 |
| Norfolk | 1 | 0 | 0 | 61 | 11 | 18 |
| North Wales | 0 | 0 | - | 43 | 5 | 12 |
| North Yorkshire | 0 | 0 | - | 46 | 10 | 22 |
| Northamptonshire | 0 | 0 | - | 77 | 16 | 21 |
| Northumbria | 0 | 0 | - | 84 | 6 | 7 |
| Nottinghamshire | 0 | 0 | - | 68 | 10 | 15 |
| South Wales | 1 | 1 | 100 | 63 | 9 | 14 |
| South Yorkshire | 0 | 0 | - | 75 | 5 | 7 |
| Staffordshire | 1 | 0 | 0 | 79 | 9 | 11 |
| Suffolk | 0 | 0 | - | 43 | 7 | 16 |
| Surrey | 0 | 0 | - | 70 | 7 | 10 |
| Sussex | 0 | 0 | - | 135 | 8 | 6 |
| Thames Valley | 0 | 0 | - | 166 | 11 | 7 |
| Warwickshire | 0 | 0 | - | 25 | 4 | 16 |
| West Mercia | 0 | 0 | - | 64 | 2 | 3 |
| West Midlands | 0 | 0 | - | 134 | 14 | 10 |
| West Yorkshire | 0 | 0 | - | 217 | 41 | 19 |
| Wiltshire | 0 | 0 | - | 22 | 7 | 32 |
| Total | 10 | 4 | 40 | 3,486 | 503 | 14 |

Table 16: Appeals received and completed by the IOPC 2014/15 to 2018/19

| IOPC non-recording appeals | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 |
|--------------------------------------|----------------|----------------|----------------|----------------|----------------|
| Received | 1,696 | 1,529 | 1,693 | 1,554 | 1,416 |
| Valid completed | 1,333 | 1,188 | 1,497 | 1,445 | 1,236 |
| Upheld | 557 | 473 | 549 | 524 | 447 |
| % Upheld | 42 | 40 | 37 | 36 | 36 |
| IOPC local resolution appeals | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 |
| Received | 73 | 76 | 82 | 37 | 78 |
| Valid completed | 45 | 43 | 69 | 38 | 70 |
| Upheld | 29 | 35 | 52 | 24 | 47 |
| % Upheld | 64 | 81 | 75 | 63 | 67 |
| IOPC investigation appeals | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 |
| Received | 2,035 | 1,950 | 1,790 | 1,654 | 1,292 |
| Valid completed | 2,426 | 1,669 | 1,721 | 1,703 | 1,310 |
| Upheld | 951 | 687 | 694 | 643 | 492 |
| % Upheld | 39 | 41 | 40 | 38 | 38 |
| IOPC disapplication appeals | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 |
| Received | 110 | 116 | 128 | 117 | 69 |
| Valid completed | 97 | 96 | 130 | 101 | 59 |
| Upheld | 19 | 24 | 20 | 11 | 11 |
| % Upheld | 20 | 25 | 15 | 11 | 19 |
| IOPC discontinuance appeals | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 |
| Received | 9 | 10 | 7 | 3 | 6 |
| Valid completed | 1 | 3 | 6 | 3 | 2 |
| Upheld | 0 | 0 | 0 | 0 | 0 |
| % Upheld | 0 | 0 | 0 | 0 | 0 |
| Total IOPC appeals | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 |
| Received | 3,923 | 3,681 | 3,700 | 3,365 | 2,861 |
| Valid completed | 3,902 | 2,999 | 3,423 | 3,290 | 2,677 |
| Upheld | 1,556 | 1,219 | 1,315 | 1,202 | 997 |
| % Upheld | 40 | 41 | 38 | 37 | 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'. 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 2018/19

| 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 | 25 | 66 | 0 | 0 | 13 | 34 | 0 | 0 | 0 | 0 | 38 |
| Bedfordshire | 15 | 25 | 1 | 2 | 43 | 72 | 1 | 2 | 0 | 0 | 60 |
| British Transport Police | 5 | 26 | 0 | 0 | 13 | 68 | 1 | 5 | 0 | 0 | 19 |
| Cambridgeshire | 11 | 28 | 1 | 3 | 27 | 69 | 0 | 0 | 0 | 0 | 39 |
| Cheshire | 27 | 66 | 0 | 0 | 14 | 34 | 0 | 0 | 0 | 0 | 41 |
| City of London | 9 | 100 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 9 |
| Cleveland | 17 | 85 | 1 | 5 | 2 | 10 | 0 | 0 | 0 | 0 | 20 |
| Cumbria | 18 | 67 | 0 | 0 | 9 | 33 | 0 | 0 | 0 | 0 | 27 |
| Derbyshire | 19 | 61 | 0 | 0 | 12 | 39 | 0 | 0 | 0 | 0 | 31 |
| Devon and Cornwall | 48 | 83 | 1 | 2 | 9 | 16 | 0 | 0 | 0 | 0 | 58 |
| Dorset | 5 | 42 | 2 | 17 | 4 | 33 | 1 | 8 | 0 | 0 | 12 |
| Durham | 18 | 44 | 1 | 2 | 20 | 49 | 1 | 2 | 1 | 2 | 41 |
| Dyfed-Powys | 14 | 45 | 0 | 0 | 17 | 55 | 0 | 0 | 0 | 0 | 31 |
| Essex | 31 | 39 | 1 | 1 | 47 | 59 | 0 | 0 | 0 | 0 | 79 |
| Gloucestershire | 9 | 64 | 1 | 7 | 4 | 29 | 0 | 0 | 0 | 0 | 14 |
| Greater Manchester | 41 | 41 | 1 | 1 | 58 | 57 | 1 | 1 | 0 | 0 | 101 |
| Gwent | 7 | 78 | 0 | 0 | 2 | 22 | 0 | 0 | 0 | 0 | 9 |
| Hampshire | 33 | 62 | 2 | 4 | 16 | 30 | 2 | 4 | 0 | 0 | 53 |
| Hertfordshire | 22 | 34 | 0 | 0 | 41 | 63 | 1 | 2 | 1 | 2 | 65 |
| Humberside | 72 | 76 | 4 | 4 | 19 | 20 | 0 | 0 | 0 | 0 | 95 |
| Kent | 59 | 51 | 8 | 7 | 46 | 40 | 2 | 2 | 0 | 0 | 115 |
| Lancashire | 48 | 55 | 0 | 0 | 39 | 45 | 0 | 0 | 0 | 0 | 87 |
| Leicestershire | 15 | 38 | 0 | 0 | 22 | 56 | 2 | 5 | 0 | 0 | 39 |
| Lincolnshire | 16 | 67 | 1 | 4 | 7 | 29 | 0 | 0 | 0 | 0 | 24 |
| Merseyside | 23 | 52 | 3 | 7 | 17 | 39 | 1 | 2 | 0 | 0 | 44 |
| Metropolitan | 208 | 28 | 26 | 4 | 455 | 62 | 44 | 6 | 0 | 0 | 733 |
| Norfolk | 66 | 73 | 0 | 0 | 24 | 26 | 1 | 1 | 0 | 0 | 91 |
| North Wales | 23 | 51 | 4 | 9 | 18 | 40 | 0 | 0 | 0 | 0 | 45 |
| North Yorkshire | 11 | 65 | 1 | 6 | 5 | 29 | 0 | 0 | 0 | 0 | 17 |
| Northamptonshire | 21 | 51 | 0 | 0 | 20 | 49 | 0 | 0 | 0 | 0 | 41 |
| Northumbria | 63 | 67 | 0 | 0 | 31 | 33 | 0 | 0 | 0 | 0 | 94 |
| Nottinghamshire | 11 | 27 | 10 | 24 | 20 | 49 | 0 | 0 | 0 | 0 | 41 |
| South Wales | 24 | 55 | 0 | 0 | 18 | 41 | 1 | 2 | 1 | 2 | 44 |
| South Yorkshire | 40 | 69 | 1 | 2 | 17 | 29 | 0 | 0 | 0 | 0 | 58 |
| Staffordshire | 22 | 69 | 0 | 0 | 10 | 31 | 0 | 0 | 0 | 0 | 32 |
| Suffolk | 33 | 67 | 1 | 2 | 14 | 29 | 1 | 2 | 0 | 0 | 49 |
| Surrey | 26 | 57 | 3 | 7 | 15 | 33 | 1 | 2 | 1 | 2 | 46 |
| Sussex | 4 | 40 | 0 | 0 | 6 | 60 | 0 | 0 | 0 | 0 | 10 |
| Thames Valley | 33 | 73 | 1 | 2 | 11 | 24 | 0 | 0 | 0 | 0 | 45 |
| Warwickshire | 27 | 69 | 0 | 0 | 10 | 26 | 2 | 5 | 0 | 0 | 39 |
| West Mercia | 78 | 89 | 0 | 0 | 8 | 9 | 2 | 2 | 0 | 0 | 88 |
| West Midlands | 52 | 78 | 1 | 1 | 14 | 21 | 0 | 0 | 0 | 0 | 67 |
| West Yorkshire | 48 | 34 | 2 | 1 | 87 | 62 | 3 | 2 | 1 | 1 | 141 |
| Wiltshire | 19 | 66 | 0 | 0 | 8 | 29 | 1 | 4 | 1 | 4 | 29 |
| Total | 1,416 | 49 | 78 | 3 | 1,292 | 45 | 69 | 2 | 6 | 0 | 2,861 |

Table 18: Outcome of appeals completed by the IOPC in 2018/19 (continues on next page)

| Police force | IOPC non-recording appeals | | | IOPC local resolution appeals | | | IOPC investigation appeals | | |
|--------------------------|----------------------------|------------|-----------|-------------------------------|-----------|-----------|----------------------------|------------|-----------|
| | Valid completed | Upheld | Upheld | Valid completed | Upheld | Upheld | Valid completed | Upheld | Upheld |
| | N | N | % | N | N | % | N | N | % |
| Avon and Somerset | 28 | 10 | 36 | 0 | 0 | - | 15 | 4 | 27 |
| Bedfordshire | 13 | 1 | 8 | 1 | 0 | 0 | 40 | 14 | 35 |
| British Transport Police | 5 | 1 | 20 | 0 | 0 | - | 12 | 3 | 25 |
| Cambridgeshire | 10 | 3 | 30 | 1 | 0 | 0 | 27 | 9 | 33 |
| Cheshire | 25 | 2 | 8 | 0 | 0 | - | 12 | 3 | 25 |
| City of London | 7 | 1 | 14 | 0 | 0 | - | 0 | 0 | - |
| Cleveland | 14 | 7 | 50 | 1 | 1 | 100 | 2 | 0 | 0 |
| Cumbria | 19 | 4 | 21 | 0 | 0 | - | 7 | 3 | 43 |
| Derbyshire | 19 | 12 | 63 | 0 | 0 | - | 10 | 2 | 20 |
| Devon and Cornwall | 49 | 14 | 29 | 1 | 1 | 100 | 6 | 1 | 17 |
| Dorset | 5 | 5 | 100 | 1 | 0 | 0 | 3 | 1 | 33 |
| Durham | 18 | 8 | 44 | 2 | 1 | 50 | 18 | 6 | 33 |
| Dyfed-Powys | 17 | 7 | 41 | 0 | 0 | - | 13 | 7 | 54 |
| Essex | 21 | 8 | 38 | 1 | 1 | 100 | 49 | 21 | 43 |
| Gloucestershire | 8 | 3 | 38 | 1 | 1 | 100 | 5 | 1 | 20 |
| Greater Manchester | 31 | 16 | 52 | 1 | 0 | 0 | 54 | 15 | 28 |
| Gwent | 5 | 2 | 40 | 0 | 0 | - | 6 | 1 | 17 |
| Hampshire | 31 | 13 | 42 | 3 | 3 | 100 | 13 | 4 | 31 |
| Hertfordshire | 23 | 5 | 22 | 0 | 0 | - | 35 | 14 | 40 |
| Humberside | 58 | 21 | 36 | 3 | 1 | 33 | 19 | 9 | 47 |
| Kent | 47 | 15 | 32 | 7 | 3 | 43 | 46 | 16 | 35 |
| Lancashire | 46 | 16 | 35 | 0 | 0 | - | 43 | 20 | 47 |
| Leicestershire | 13 | 3 | 23 | 0 | 0 | - | 22 | 5 | 23 |
| Lincolnshire | 18 | 8 | 44 | 1 | 1 | 100 | 6 | 1 | 17 |
| Merseyside | 21 | 8 | 38 | 3 | 3 | 100 | 20 | 5 | 25 |
| Metropolitan | 191 | 58 | 30 | 24 | 17 | 71 | 466 | 165 | 35 |
| Norfolk | 70 | 14 | 20 | 0 | 0 | - | 34 | 9 | 26 |
| North Wales | 25 | 4 | 16 | 3 | 2 | 67 | 21 | 3 | 14 |
| North Yorkshire | 6 | 3 | 50 | 1 | 0 | 0 | 5 | 4 | 80 |
| Northamptonshire | 12 | 7 | 58 | 0 | 0 | - | 18 | 6 | 33 |
| Northumbria | 58 | 19 | 33 | 0 | 0 | - | 30 | 18 | 60 |
| Nottinghamshire | 13 | 9 | 69 | 7 | 6 | 86 | 20 | 10 | 50 |
| South Wales | 16 | 9 | 56 | 0 | 0 | - | 21 | 13 | 62 |
| South Yorkshire | 31 | 8 | 26 | 1 | 1 | 100 | 20 | 14 | 70 |
| Staffordshire | 17 | 7 | 41 | 0 | 0 | - | 13 | 5 | 38 |
| Suffolk | 33 | 9 | 27 | 1 | 0 | 0 | 12 | 4 | 33 |
| Surrey | 22 | 9 | 41 | 3 | 3 | 100 | 12 | 6 | 50 |
| Sussex | 3 | 2 | 67 | 0 | 0 | - | 10 | 5 | 50 |
| Thames Valley | 30 | 9 | 30 | 1 | 1 | 100 | 12 | 8 | 67 |
| Warwickshire | 21 | 11 | 52 | 0 | 0 | - | 10 | 2 | 20 |
| West Mercia | 38 | 31 | 82 | 0 | 0 | - | 7 | 3 | 43 |
| West Midlands | 44 | 24 | 55 | 1 | 1 | 100 | 17 | 9 | 53 |
| West Yorkshire | 40 | 15 | 38 | 1 | 0 | 0 | 90 | 37 | 41 |
| Wiltshire | 15 | 6 | 40 | 0 | 0 | - | 9 | 6 | 67 |
| Total | 1,236 | 447 | 36 | 70 | 47 | 67 | 1,310 | 492 | 38 |

This data is taken from the IOPC's internal case tracking management system. **Page 94**
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 2018/19 (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 | 0 | 0 | - | 0 | 0 | - | 43 | 14 | 33 |
| Bedfordshire | 1 | 0 | 0 | 0 | 0 | - | 55 | 15 | 27 |
| British Transport Police | 1 | 0 | 0 | 0 | 0 | - | 18 | 4 | 22 |
| Cambridgeshire | 0 | 0 | - | 0 | 0 | - | 38 | 12 | 32 |
| Cheshire | 0 | 0 | - | 0 | 0 | - | 37 | 5 | 14 |
| City of London | 0 | 0 | - | 0 | 0 | - | 7 | 1 | 14 |
| Cleveland | 0 | 0 | - | 0 | 0 | - | 17 | 8 | 47 |
| Cumbria | 0 | 0 | - | 0 | 0 | - | 26 | 7 | 27 |
| Derbyshire | 0 | 0 | - | 0 | 0 | - | 29 | 14 | 48 |
| Devon and Cornwall | 0 | 0 | - | 0 | 0 | - | 56 | 16 | 29 |
| Dorset | 1 | 1 | 100 | 0 | 0 | - | 10 | 7 | 70 |
| Durham | 0 | 0 | - | 1 | 0 | 0 | 39 | 15 | 38 |
| Dyfed-Powys | 0 | 0 | - | 0 | 0 | - | 30 | 14 | 47 |
| Essex | 0 | 0 | - | 0 | 0 | - | 71 | 30 | 42 |
| Gloucestershire | 0 | 0 | - | 0 | 0 | - | 14 | 5 | 36 |
| Greater Manchester | 1 | 0 | 0 | 0 | 0 | - | 87 | 31 | 36 |
| Gwent | 0 | 0 | - | 0 | 0 | - | 11 | 3 | 27 |
| Hampshire | 1 | 0 | 0 | 0 | 0 | - | 48 | 20 | 42 |
| Hertfordshire | 1 | 0 | 0 | 0 | 0 | - | 59 | 19 | 32 |
| Humberside | 0 | 0 | - | 0 | 0 | - | 80 | 31 | 39 |
| Kent | 2 | 0 | 0 | 0 | 0 | - | 102 | 34 | 33 |
| Lancashire | 0 | 0 | - | 0 | 0 | - | 89 | 36 | 40 |
| Leicestershire | 2 | 0 | 0 | 0 | 0 | - | 37 | 8 | 22 |
| Lincolnshire | 0 | 0 | - | 0 | 0 | - | 25 | 10 | 40 |
| Merseyside | 1 | 0 | 0 | 0 | 0 | - | 45 | 16 | 36 |
| Metropolitan | 41 | 9 | 22 | 0 | 0 | - | 722 | 249 | 34 |
| Norfolk | 0 | 0 | - | 0 | 0 | - | 104 | 23 | 22 |
| North Wales | 0 | 0 | - | 0 | 0 | - | 49 | 9 | 18 |
| North Yorkshire | 0 | 0 | - | 0 | 0 | - | 12 | 7 | 58 |
| Northamptonshire | 0 | 0 | - | 0 | 0 | - | 30 | 13 | 43 |
| Northumbria | 0 | 0 | - | 0 | 0 | - | 88 | 37 | 42 |
| Nottinghamshire | 0 | 0 | - | 0 | 0 | - | 40 | 25 | 63 |
| South Wales | 0 | 0 | - | 1 | 0 | 0 | 38 | 22 | 58 |
| South Yorkshire | 0 | 0 | - | 0 | 0 | - | 52 | 23 | 44 |
| Staffordshire | 0 | 0 | - | 0 | 0 | - | 30 | 12 | 40 |
| Suffolk | 1 | 1 | 100 | 0 | 0 | - | 47 | 14 | 30 |
| Surrey | 0 | 0 | - | 0 | 0 | - | 37 | 18 | 49 |
| Sussex | 0 | 0 | - | 0 | 0 | - | 13 | 7 | 54 |
| Thames Valley | 0 | 0 | - | 0 | 0 | - | 43 | 18 | 42 |
| Warwickshire | 1 | 0 | 0 | 0 | 0 | - | 32 | 13 | 41 |
| West Mercia | 1 | 0 | 0 | 0 | 0 | - | 46 | 34 | 74 |
| West Midlands | 0 | 0 | - | 0 | 0 | - | 62 | 34 | 55 |
| West Yorkshire | 3 | 0 | 0 | 0 | 0 | - | 134 | 52 | 39 |
| Wiltshire | 1 | 0 | 0 | 0 | 0 | - | 25 | 12 | 48 |
| Total | 59 | 11 | 19 | 2 | 0 | 0 | 2,677 | 997 | 37 |

This data is taken from the IOPC's internal case tracking management system. **Page 95**
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 2018/19

| Gender | 2017/18 | | 2018/19 | |
|-------------------|---------------|------------|---------------|------------|
| | N | % | N | % |
| Female | 12,286 | 39 | 11,749 | 39 |
| Male | 18,956 | 60 | 17,577 | 58 |
| Other | 95 | 0 | 95 | 0 |
| Prefer not to say | 0 | 0 | 0 | 0 |
| Unknown | 382 | 1 | 791 | 3 |
| Total | 31,719 | 100 | 30,212 | 100 |

Table 20: Ethnicity of complainants 2018/19

| Ethnicity | 2017/18 | | 2018/19 | |
|--------------|---------------|------------|---------------|------------|
| | N | % | N | % |
| White | 14,516 | 46 | 13,451 | 45 |
| Black | 1,320 | 4 | 1,255 | 4 |
| Asian | 1,438 | 5 | 1,365 | 5 |
| Other | 720 | 2 | 715 | 2 |
| Not stated | 12,507 | 39 | 12,287 | 41 |
| Unknown | 1,218 | 4 | 1,139 | 4 |
| Total | 31,719 | 100 | 30,212 | 100 |

Table 21: Age of complainants 2018/19

| Age group | 2017/18 | | 2018/19 | |
|--------------|---------------|------------|---------------|------------|
| | N | % | N | % |
| 17 & below | 257 | 1 | 247 | 1 |
| 18-29 | 4,045 | 13 | 3,957 | 13 |
| 30-39 | 5,839 | 18 | 5,699 | 19 |
| 40-49 | 5,760 | 18 | 5,678 | 19 |
| 50-59 | 4,912 | 15 | 4,992 | 17 |
| 60+ | 3,034 | 10 | 2,938 | 10 |
| Unknown | 7,872 | 25 | 6,701 | 22 |
| Total | 31,719 | 100 | 30,212 | 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 2018/19

| Status | 2017/18 | | 2018/19 | |
|--|---------------|------------|---------------|------------|
| | N | % | N | % |
| Police officer ranks | 30,406 | 87 | 29,842 | 87 |
| Police staff including traffic wardens | 3,200 | 9 | 3,208 | 9 |
| Community support officers | 923 | 3 | 822 | 2 |
| Contracted staff | 148 | 0 | 121 | 0 |
| Special constables | 403 | 1 | 378 | 1 |
| Total | 35,080 | 100 | 34,371 | 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 2018/19

| Gender | 2017/18 | | 2018/19 | |
|--------------|---------------|------------|---------------|------------|
| | N | % | N | % |
| Female | 10,028 | 29 | 9,979 | 29 |
| Male | 24,682 | 71 | 23,965 | 70 |
| Other | 13 | 0 | 12 | 0 |
| Unknown | 190 | 1 | 225 | 1 |
| Total | 34,913 | 100 | 34,181 | 100 |

Table 24: Ethnicity of those subject to complaint 2018/19

| Ethnicity | 2017/18 | | 2018/19 | |
|--------------|---------------|------------|---------------|------------|
| | N | % | N | % |
| White | 29,261 | 84 | 27,916 | 82 |
| Black | 568 | 2 | 556 | 2 |
| Asian | 1,000 | 3 | 1,026 | 3 |
| Other | 655 | 2 | 667 | 2 |
| Not stated | 853 | 2 | 878 | 3 |
| Unknown | 2,576 | 7 | 3,138 | 9 |
| Total | 34,913 | 100 | 34,181 | 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 this report, which follows the route of a complaint or appeal through the police complaints system.

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.

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. We refer to two types of investigation 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.

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*: <https://www.policeconduct.gov.uk/research-and-learning/statistics/complaints-statistics>

¹⁷ The test to determine who should deal with an appeal is set out in section 13 of our Statutory Guidance (2015) <https://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).

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.

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 themselves the complaint is repetitive
- if the complaint is repetitive
- 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.

Discontinuance: A discontinuance ends an ongoing investigation into a complaint. It can occur only if one or more of the following 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 repetitive
- 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. This results in the allegation being recorded as withdrawn and may mean no further action being taken.

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

- a severity assessment of the level of misconduct must be carried out
- formal notices of investigation must be served on the police officers/staff involved in 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 complaint¹⁵. 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. 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 complaint about a force’s direction and control.

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 13 of our Statutory Guidance (2015) www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

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 a force's direction and control.

Disapplication appeal: 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 a force's 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 a force's 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 people present at an 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
- someone who 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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We welcome telephone calls in Welsh

Rydym yn croesawu galwadau ffôn yn y Gymraeg

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