



## Professional Standards and Integrity Committee of the City of London Police Authority Board

**Date:** MONDAY, 14 SEPTEMBER 2020

**Time:** 11.00 am

**Venue:** MICROSOFT TEAMS

**Members:** Alderman Alison Gowman (Chair)  
Caroline Addy  
Douglas Barrow  
Nicholas Bensted-Smith  
Tijs Broeke  
Mary Durcan (Co-Opted)  
Alderman Emma Edhem  
Alderman Gregory Jones QC (Co-Opted)  
Deborah Oliver  
Deputy James Thomson  
James Tumbridge (Co-Opted)

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

### Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link

<https://youtu.be/zy4FKn4x-bw>

This meeting will be a virtual meeting and therefore will not take place in a physical location following regulations made under Section 78 of the Coronavirus Act 2020. A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

**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. **TERMS OF REFERENCE**  
To receive the terms of reference of the Committee as agreed by the City of London Police Authority Board at its meeting on 29 July 2020.  

**For Information**  
(Pages 1 - 2)
4. **MINUTES**  
To agree the public minutes and summary of the meeting held on 29 November 2019.  

**For Decision**  
(Pages 3 - 8)
5. **REFERENCES - TO FOLLOW**  
Joint report of the Town Clerk and Commissioner.  

**For Information**
6. **COVID-19 FIXED PENALTY NOTICES**  
Report of the Commissioner.  

**For Information**  
(Pages 9 - 12)
7. **STOP AND SEARCH QUARTER 1 2020/21 - 1 APRIL 2020 - 30 JUNE 2020**  
Report of the Commissioner.  

**For Information**  
(Pages 13 - 34)
8. **SUMMARY OF RECENT REVIEWS OF POLICE COMPLAINTS**  
Report of the Town Clerk.  

**For Information**  
(Pages 35 - 44)
9. **INTEGRITY AND CODE OF ETHICS UPDATE**  
Report of the Commissioner.  

**For Information**  
(Pages 45 - 58)

10. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
11. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
12. **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**
13. **NON-PUBLIC MINUTES**  
To agree the non-public minutes of the meeting held on 29 November 2019.

**For Decision**  
(Pages 59 - 64)
14. **NOTE OF INQUORATE MEETING - 2 MARCH 2020**  
To receive a note of the inquorate meeting held on 2 March 2020.

**For Information**  
(Pages 65 - 72)
15. **NON-PUBLIC REFERENCES - TO FOLLOW**  
Joint report of the Town Clerk and Commissioner.

**For Information**
16. **EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES**  
Report of the Comptroller and City Solicitor.

**For Information**  
(Pages 73 - 84)
17. **PROFESSIONAL STANDARDS STATISTICS - QUARTER 1 - 1 APRIL 2020-30 JUNE 2020**  
Report of the Commissioner.

**For Information**  
(Pages 85 - 112)
18. **PROFESSIONAL STANDARDS DIRECTORATE CASES**  
Report of the Commissioner.

**For Information**  
(Pages 113 - 114)

  - a) No Case to Answer / Not Upheld (Pages 115 - 118)
  - b) Local Resolution (Pages 119 - 126)

- c) Death or Serious Injury (Pages 127 - 136)
- d) Cases dealt with under Complaint and Conduct Regulations 2019 (Pages 137 - 144)

- 19. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
- 20. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

## Professional Standards and Integrity Committee

### Composition

- Up to six Members of the Police Authority Board appointed by the Police Authority Board, in addition to the Chairman and Deputy Chairman.
- Up to three co-opted Common Council Members to be appointed by the Police Authority Board
- One external co-opted Member to be appointed by the Police Authority Board.

### Terms of Reference

*To be responsible for:*

- a. overseeing the handling of complaints and the maintenance of standards across the force, where necessary recommending changes in procedures and performance to the Police Authority Board;*
- b. monitoring the Force's handling of misconduct cases and related organisational learning;*
- c. monitoring government, police authorities and other external agencies' policies and actions relating to professional standards and advising the Police Authority Board or Commissioner as appropriate.*
- d. overseeing the work of the City of London Police Integrity Standards Board, whose purpose is to direct and co-ordinate the auditing of the key indicators in relation to the City of London Police Integrity Dashboard, delivery of associated action plans and promoting the understanding of the Police Code of Ethics.*
- e. the determination of reviews of police complaints submitted to the City of London Police Authority.*
- f. The power to make a determination on reviews to lie with a Review Panel composed of at least three Members of the Committee.*
- g. Overseeing measures to promote equality, inclusion and engagement by the Force.*

### Quorum

Any three Members.

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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**

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Chairman

**Contact Officer: Alistair MacLellan / [alistair.maclellan@cityoflondon.gov.uk](mailto:alistair.maclellan@cityoflondon.gov.uk)**

## CITY OF LONDON POLICE: OFFICIAL

### COVID 19 FPNs

#### 1. Fines Issued

Between 10<sup>th</sup> April and 19<sup>th</sup> May 2020 we issued 72 fines in relation to Coronavirus with most being issued in the Metropolitan Police area as opposed to the City. Most fines were issued to people contravening the restriction of movement put in place during lockdown.

Fine Offence	CoLP	MPS	Total
Contravene a direction or fail to comply with instruction - Coronavirus	2	1	3
Contravene requirement as to restriction of movement during emergency period - Coronavirus	12	48	60
Contravene requirement to not participate in a gathering in public of more than two people - Coronavirus	6	1	7
Participate in gathering in public of more than two people in England during coronavirus emergency period	0	2	2
<b>Total</b>	<b>20</b>	<b>52</b>	<b>72</b>

#### Demographics

Most fines were issued to those individuals perceived to be Black by officers, followed by White and then Asian.

	CoLP	MPS	Total
0. Unknown	2	2	4
1. White - North European	5	9	14
2. White - South European	3	6	9
3. Black	9	18	27
4. Asian	1	17	18

When looking at the age group of those people issued with a fine most were between 18-24 years old and very few over 35.

	CoLP	MPS	Total
18-24 yrs	11	30	41
25-34 yrs	5	19	24
35-50 yrs	2	3	5
50+ yrs	2	0	2

## CITY OF LONDON POLICE: OFFICIAL

Combining both age and ethnicity the most common group issued with a fine was 18-24 year old Black individuals, then 18-24 year old Asian individuals and then 18-24 year old White individuals.

	CoLP	MPS	Total
<b>0. Unknown</b>			
18-24 yrs	0	1	1
25-34yrs	1	0	1
35-50yrs	1	1	2
<b>1. White - North European</b>			
18-24 yrs	2	5	7
25-34yrs	1	4	5
50+ yrs	2	0	2
<b>2. White - South European</b>			
18-24 yrs	2	3	5
25-34yrs	1	3	4
<b>3. Black</b>			
18-24 yrs	7	8	15
25-34yrs	1	8	9
35-50yrs	1	2	3
<b>4. Asian</b>			
18-24 yrs	0	13	13
25-34yrs	1	4	5

## CITY OF LONDON POLICE: OFFICIAL

### 2. Use of Powers

There were 82 tickets issued where the individual was moved on or warned as opposed to fines and most of these did take place in the City, (n=74, compared to n=8 on MPS ground).

#### Demographics

Those individuals where we issued a ticket to show powers had been used were most likely to be White, then Black and then Asian.

	CoLP	MPS	Total
0. Unknown	1	0	1
1. White - North European	28	2	30
2. White - South European	14	1	15
3. Black	20	1	21
4. Asian	10	3	13
6. Middle Eastern	1	1	2
<b>Total</b>	<b>74</b>	<b>8</b>	<b>82</b>

In terms of age those issued a warning were typically slightly older than those issued with fines with most being between 25 and 34 years old.

	CoLP	MPS	Total
10-17 yrs	8		8
18-24 yrs	19	2	21
25-34yrs	22	3	25
35-50yrs	20	3	23
50+ yrs	4		4
Unknown Age	1		1

Combining age and perceived ethnicity those most commonly issued with a use of powers ticket were White individuals aged between 35 and 50 years old or Black and aged between 25 and 34.

	CoLP	MPS	Total
<b>0. Unknown</b>			
35-50yrs	1	0	1
<b>1. White - North European</b>			
10-17 yrs	5	0	5
18-24 yrs	4	1	5
25-34yrs	7	0	7
35-50yrs	10	1	11
50+ yrs	2	0	2
<b>2. White - South European</b>			
18-24 yrs	5	1	6

**CITY OF LONDON POLICE: OFFICIAL**

25-34yrs	4	0	4
35-50yrs	5	0	5
<b>3. Black</b>			
10-17 yrs	2	0	2
18-24 yrs	5	0	5
25-34yrs	10	1	11
35-50yrs	2	0	2
50+ yrs	1	0	1
<b>4. Asian</b>			
18-24 yrs	5	0	5
25-34yrs	1	2	3
35-50yrs	2	1	3
50+ yrs	1	0	1
Unknown Age	1	0	1
<b>6. Middle Eastern</b>			
10-17 yrs	1	0	1
35-50yrs	0	1	1



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Performance Information Unit

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**Stop and Search**  
**Quarter 1 2020/21**  
**1<sup>st</sup> April – 30<sup>th</sup> June 2020**

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<b>Compiled by:</b>	PIU
<b>Reviewed by:</b>	Performance Analysis Manger
<b>Directorate:</b>	I&I
<b>Date completed:</b>	20/07/2020

**CITY OF LONDON POLICE: OFFICIAL**

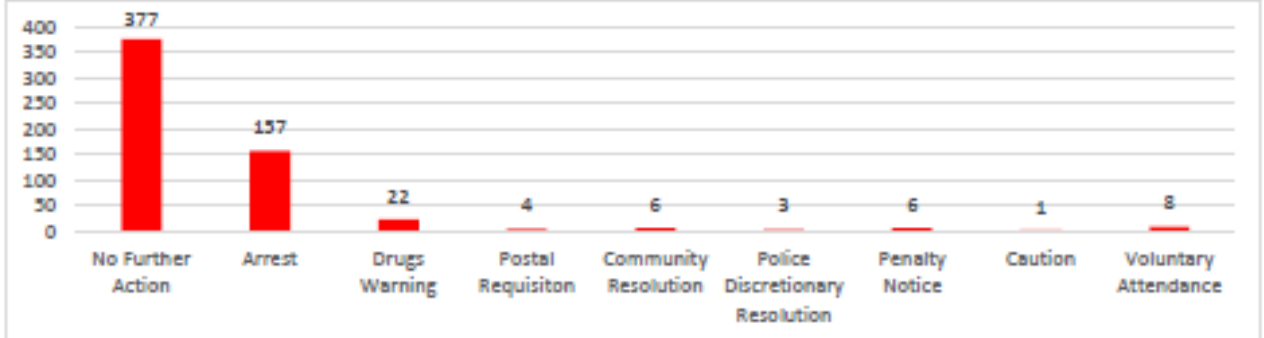
**Stop and Search Summary**  
**Q1 2020/21 (1st April - 30th June 2020)**



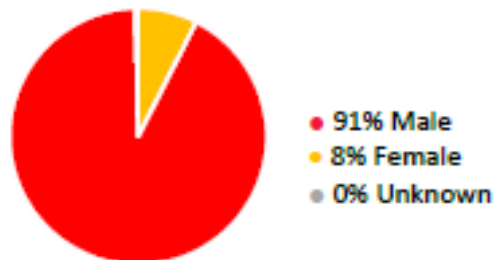
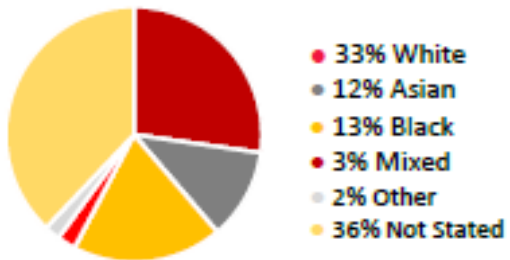
**Reason for Stop**



**Outcome of Stop**



**Subject Self Defined Ethnicity**      **Subject Gender**

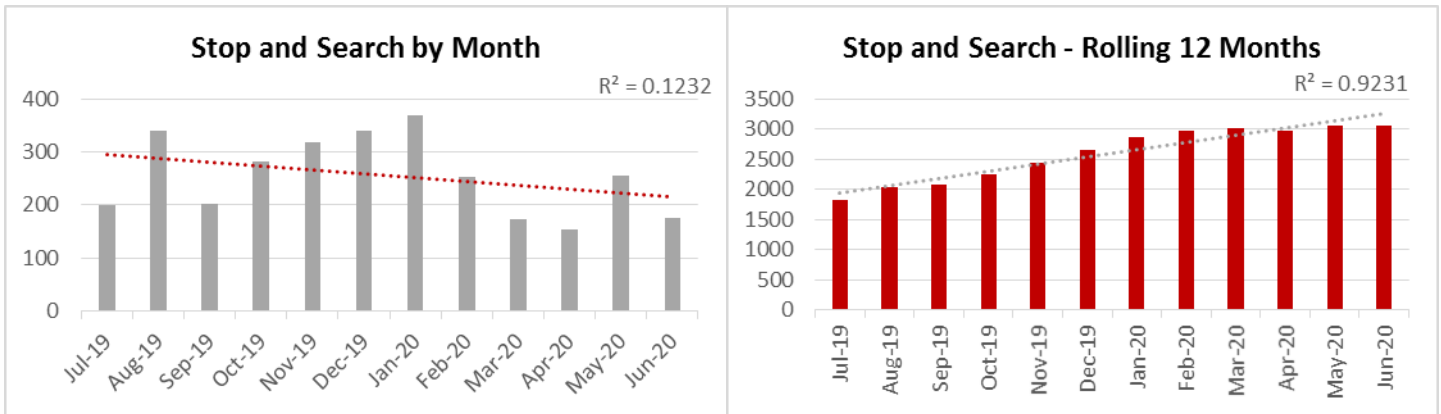


# **Stop and Search – Quarter 1 20/21**

## **1.1 Key Findings**

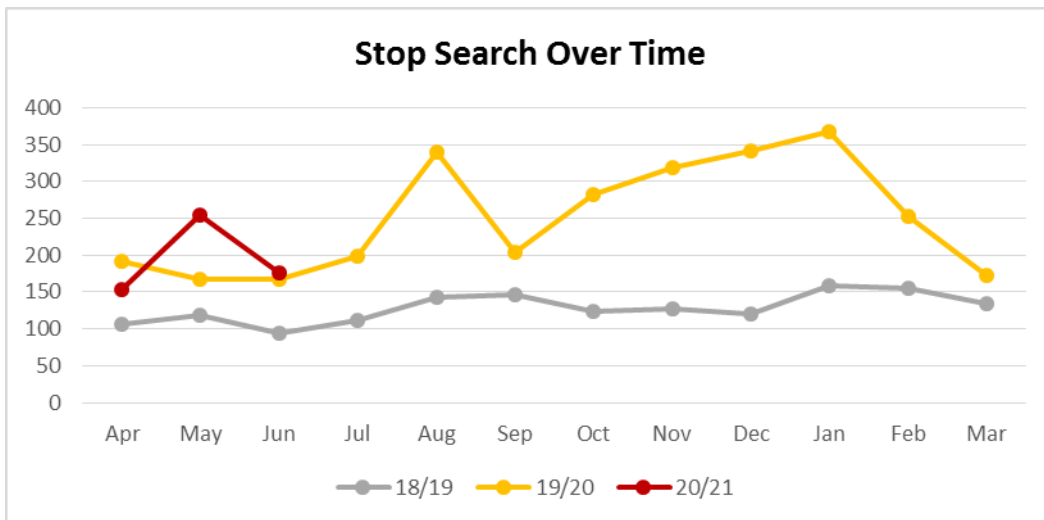
- There has been a significant drop in the number of searches carried out this quarter (-26%, n=210) as the effects of Coronavirus and lockdown have impacted activity.
- On average 194 stops were carried out each month this quarter. Stops reached their lowest level for the year in April but we are starting to see levels increase again in May and June.
- When looking at previous years, levels for this quarter are not too dissimilar from last year and remain higher than in 2018/19.
- Searching for drugs continues to be the main reason stops are made. There were two stops relating to Khat possession this quarter both of which resulted in a no further action outcome.
- Six weapons were found and recovered as a result of stop search this quarter; four general weapons, one bladed article and one imitation firearm.
- Most stops took place on Tuesdays and Fridays, the peak time this quarter was Tuesday between 23:00-00:00. Levels are noticeably lower between 04:00-11:00 most days and Sunday and Monday are the quietest days overall.
- For the current period a high percentage of our stops took place on Metropolitan Police ground (40%, n=235).
- The most common locations of all stops were Bishopsgate, Queen Victoria Street, Tower Bridge and London Wall.
- The group most commonly stopped and searched in terms of perceived and self-defined ethnicity is white individuals.
- Levels of disproportionality have increased slightly across this quarter from 1.8 to 1.9 for Black individuals and from 1.1 to 1.3 for Asian individuals, the level for other ethnicities has remained the same.
- Most people stopped are between the ages of 18 and 24 years old.
- There were 31 stops of under 18s this quarter, the youngest person stopped was 13. Most juvenile stops related to drugs. There were only two arrests of juveniles this quarter giving an arrest rate of 6%.
- There were 28 full strip searches this quarter, objects were found in half of them and 9 arrests were made.
- The find rate this quarter is 33% and the arrest rate is 27%.
- The overall positive outcome rate is 35%.

## 1.2 Monthly Breakdown



There has been a significant drop in the number of searches carried out this quarter as the effects of Coronavirus and lockdown have impacted activity, the rolling 12 month graph however shows that levels are on the whole still showing an increasing trend, depending on what happens in the coming months this may begin to show a decrease or plateau to a steady level.

On average over the last 12 months there have been 255 stops a month falling to 194 this quarter, levels were at their lowest all year in April when people were abiding by lockdown rules and mostly staying home. We did see an increase in May but levels decreased again in June, the spike in May can be attributed to offering assistance to the Metropolitan Police as the majority of these stops were carried out on MPS ground (53%, n=136) .

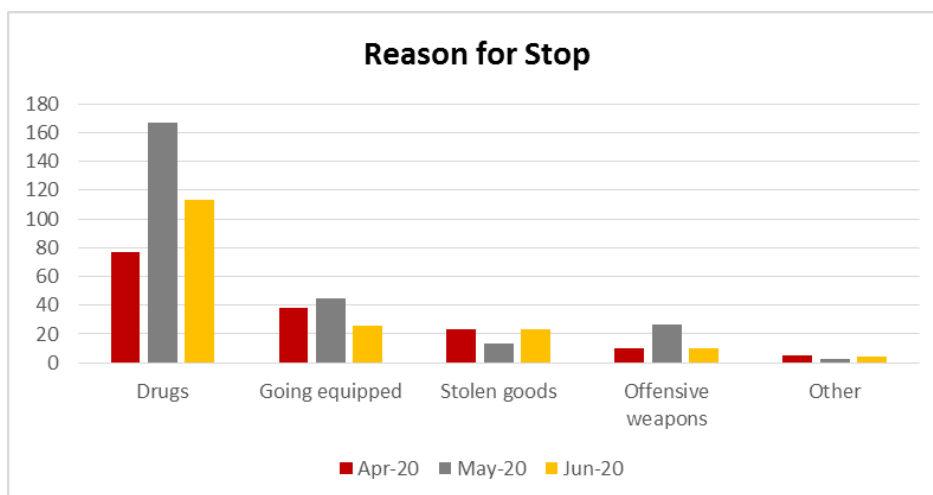


When looking at the last couple of years levels for the last couple of months are all above where they were in 2018 and at somewhat similar levels to 2019. With Notting Hill Carnival cancelled we are unlikely to see such a high peak in August this year but should see a steady increase in the coming months as people's activity begins to increase as social distancing measures continue to be relaxed.

## 2.1 Reason for Stop

The most common legal basis for searches this quarter was Misuse of Drugs Act (61%, n=359) followed by PACE (38%, n=366). The Firearms Act s47 accounted for less than 1% of stops, five in number. There were no Section 60 stops in this period.

The reasons for the stops this quarter are shown in the below graph;



Drug stops continue to be the most common as observed in previous quarters. Most stops related to cannabis and a smaller number for other controlled drugs (n=264 to n=91 respectively). There were two stops relating to Khat possession this quarter both of which resulted in a no further action outcome.

Under the offensive weapons category there were 13 searches for a bladed article and 29 for a general offensive weapon. Three of the bladed article stops resulted in an arrest, although only one was as a result of finding a bladed weapon. There were two firearms stops in May and three in June. One person was arrested after an imitation firearm (BB gun) was found, the other stops all resulted in no further action being taken.

The proportion of Going Equipped and Stolen Goods searches has dropped slightly from previous quarters from 36% to 28% (n=168) this goes in hand with the decrease we have seen in acquisitive crime across the same period as many retail premises were shut limiting opportunities for shoplifting and people being at home limited opportunities for theft. There has been a focus on preventing business burglaries in empty premises which some of these stops may relate to.

There were no terrorism stops this quarter.

## 2.2 Reason for Stop – Drugs Searches

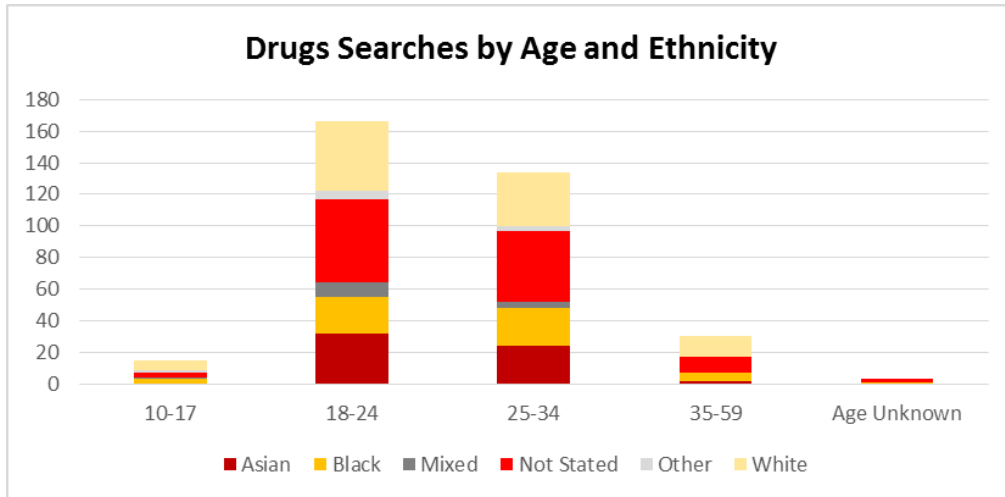
Drugs searches most commonly took place on Tuesdays and Fridays this quarter, with particular peaks being Tuesday between 23:00-23:59 and Sunday between 23:00-23:59. The majority of drug stops carried out this quarter took place on Metropolitan Police ground (53%, n=189).

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Breaking the categories of stops down 264 related to Cannabis (75%) and 93 (25%) to other drugs, 174 searches (49%) involved both persons and vehicles.

The find rate for drugs searches for this quarter is 36% with 128 out of 357 searches having a positive result. There were 101 arrests made as a result of drugs stops (28%), 21 drugs warnings were issued, 1 caution, 3 postal requisitions, 6 penalty notices, 1 community resolution and 6 voluntary attendances. The overall positive outcome rate for drug searches is 39% (n=139).

Common repeat locations for drugs related stops this quarter were Tower Bridge, Bishopsgate and London Wall.



The graph above shows the demographic breakdown of individuals stopped with regards to drugs.

They were mainly male (89%, n=318), did not state their ethnicity (32%, n=113) and between 18 and 24 years old (46%, n=166). For those who did not state their ethnicity they were most often perceived to be Black (35%, n=39). However when perceived ethnicities for those who did not state are added to the self-defined ethnicities the most common ethnic group stopped for drugs is white individuals (35%, n=124).

Aside from these searches there were nine further vehicle only searches.

### 2.3 Reason for Stop – Going Equipped and Stolen Goods

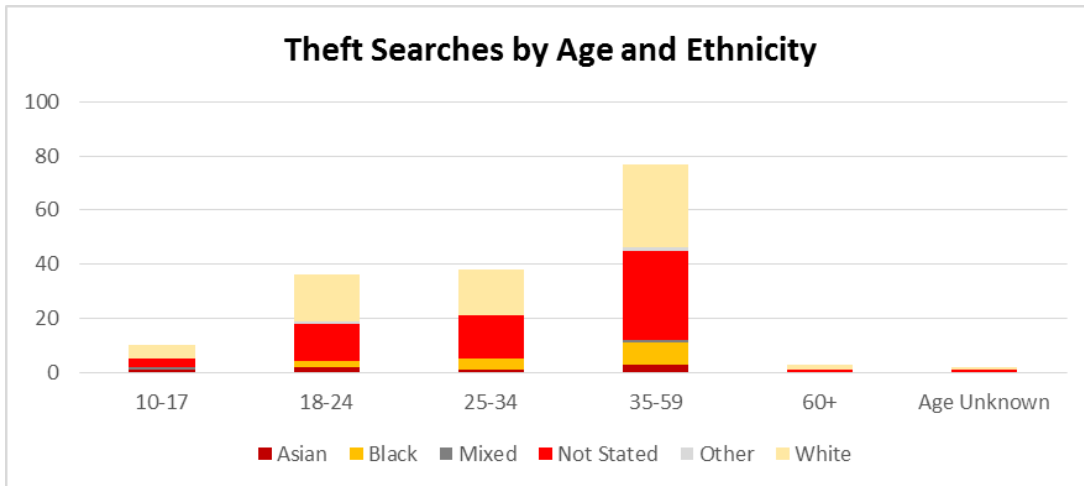
Stops relating to going equipped or stolen goods most commonly took place on Mondays but peak on a Friday afternoon between (16:00-16:59).

The find rate for theft related searches this quarter is 30% with 42 searches finding the object(s) they were searching for and a further 9 finding other objects.

There were 45 arrests resulting from these stops (27%), when other outcomes are included the positive outcome rate is 32% this includes three community resolutions, one postal requisition and two voluntary attendances.

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The most common street locations for these searches this quarter were Bishopsgate, Cheapside and Eastcheap.



The graph above shows the demographic breakdown of individuals stopped with regards to going equipped or stolen property.

They were mainly male (90%, n=152), white (43%, n=73) and between 35 and 59 years old (46%, n=77). For those who did not state their ethnicity they were most often perceived to be White- North European (50%, n=35). Looking at self-defined and perceived ethnicities together takes the percentage of white people stopped to 71% (n=119).

There were two vehicle only searches for theft this quarter.

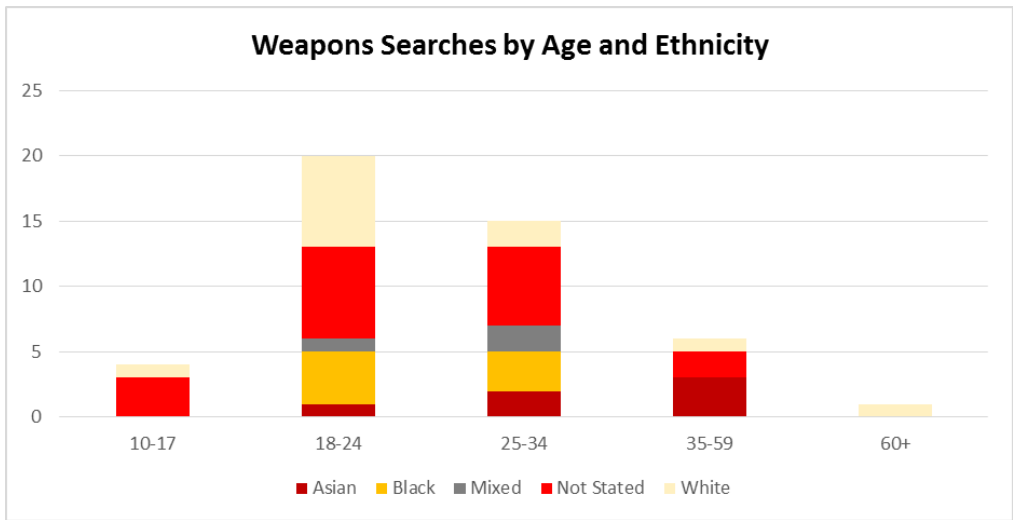
### 2.4 Reason for Stop – Offensive Weapons

Stops relating to weapons (bladed, offensive or firearms) most commonly took place on Thursdays, with a spike between 17:00-17:59.

The find rate for weapons related searches this quarter is 17% with 6 searches finding the object(s) they were searching for and a further 2 finding other objects. The weapons found and recovered were four general weapons, one bladed article and one imitation firearm.

There were 8 arrests resulting from these stops (17%), when other outcomes are included the positive outcome rate is 23% this includes the arrests, two community resolutions and a drug warning.

The most common street locations for these searches this quarter were Bishopsgate and High Road in Tottenham.



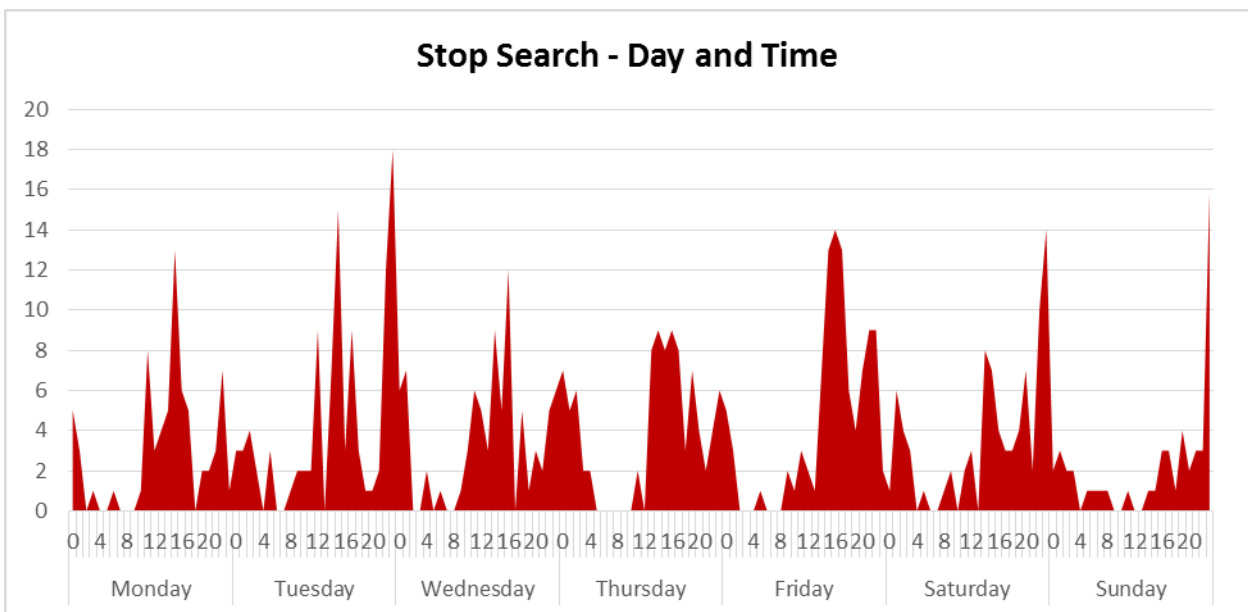
The graph above shows the demographic breakdown of individuals stopped with regards to weapons.

They were mainly male (96%, n=45), did not state their ethnicity (38%, n=18) and between 18 and 24 years old (39%, n=24). For those who did not state their ethnicity they were most often perceived to be Black (56%, n=10), when this is added to self-defined ethnicities people of Black ethnicities were most commonly stopped (36%, n=17).

There was one vehicle only stop in relation to weapons this quarter.

## 2.5 Time and Location of Stop

Most stops took place on Tuesdays and Fridays, the peak time this quarter was Tuesday between 23:00-00:00. Levels are noticeably lower between 04:00-11:00 most days and Sunday and Monday are the quietest days overall.



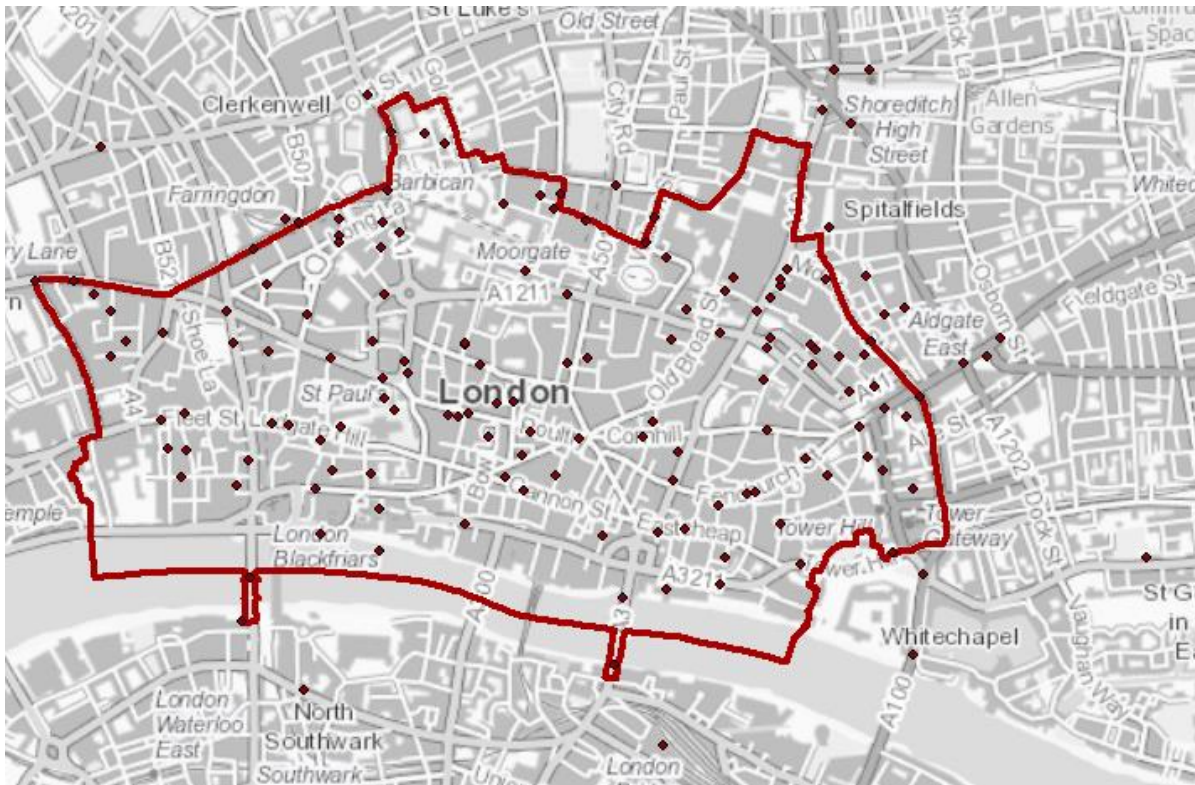
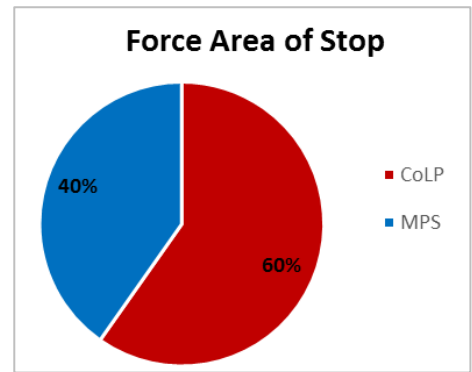


## CITY OF LONDON POLICE: OFFICIAL

For the current period a high percentage of our stops took place on Metropolitan Police ground (40%, n=235), High Road in Tottenham was a key repeat MPS location this quarter.

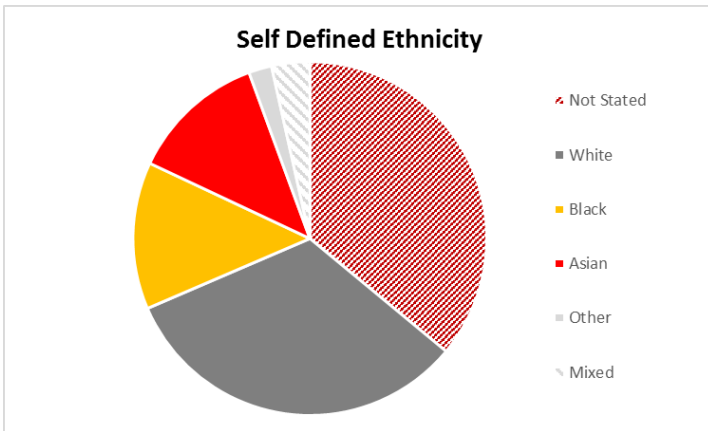
The most common locations of all stops were Bishopsgate, Queen Victoria Street, Tower Bridge and London Wall. All of the top 10 locations this quarter are street records.

Locations of stops in and around the City can be seen depicted on the map below;



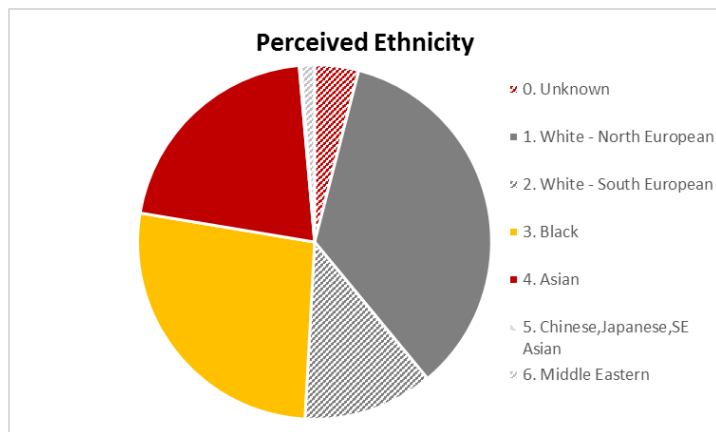
### 3.1 Ethnicity

The group most commonly stopped and searched in terms of perceived ethnicity (34%, n=200) is White – North European individuals, this is similar for self-defined ethnicity with white individuals accounting for 32% of searches (n=186).



In terms of self-defined ethnicity there is also a large portion of people who did not wish to state their ethnicity (35%, n=206). When compared to their perceived ethnicity the majority of these individuals were perceived to be white (38%, n=79) or black (31%, n=63). The majority of people who chose not to state their ethnicity are between 18 and 24 years of age (36%, n=75).

The biggest discrepancy between self-defined and perceived ethnicity is seen with white individuals with 46% of people stopped perceived to be white but only 32% defining themselves as such. The gap for black individuals is 13%, 26% were perceived to be black but only 13% defined themselves as such.



As per the above these gaps are mainly due to these individuals choosing not to state their own ethnicity on the stop and search form.

Comparisons across the two recorded ethnicities are however somewhat difficult as categories do not match exactly. For example a number of individuals perceived as black (n=9) or white (n=5) self-defined as mixed ethnicity but this is not an option the officer can select for perceived ethnicity.

### 3.2 Disproportionality

#### 3.2.1 What is disproportionality?

When the Equality and Human Rights Commission (EHRC) published their Stop and Think report in 2010 looking in to the use of stop search by UK police forces they used two measures to assess fairness in terms of ethnicity; a disproportionality ratio and a count of excess stops.

Since then disproportionality has become a key measure for forces when examining the use of stop and search. The ratio looks at how much more likely black and Asian people are to be

searched than white people based on their prevalence in the local population. Calculating the figure in this way allows for comparisons between forces of different sizes and ethnic diversity.

### **3.2.2 Disproportionality and the City**

Due to the relatively small resident population compared to the large transient one in the City it is not easy to address questions of disproportionality. Traditionally this is calculated using the resident population of an area and the officer perceived ethnicity. In the current period however there were only two people stopped who gave their address as being within City grounds.

Another option available is to use the workday population which includes all people who gave a fixed work place in the City and those residents who are at home during the day however given that 56% (n=328) of stops occur outside of a typical working day (Monday-Friday 08:00-18:00) this is also unlikely to give an accurate representation of the available street population. Particularly during the current climate of coronavirus with many people working from home this is likely not to be relevant.

When we look at the residential addresses of people stopped this quarter 71% live in the greater London area, 9% are of no fixed abode, 9% are from other areas and 10% did not give their address.

Based on this disproportionality has been calculated using the residential population figures for the whole London region.

In terms of population data the most recent finalised census data is from 2011 so that has been used here. The most recent midyear estimates for 2018 were also checked but did not offer much difference in terms of results.

Levels of disproportionality have increased slightly across this quarter from 1.8 to 1.9 for Black individuals and from 1.1 to 1.3 for Asian individuals, the level for other ethnicities has remained the same.

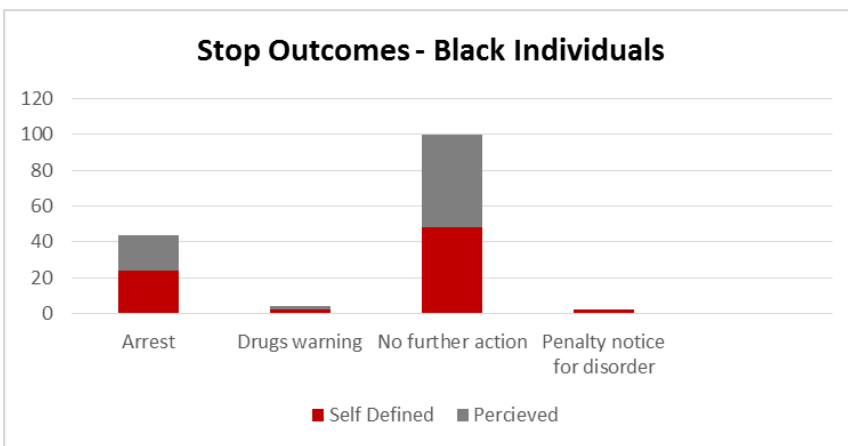
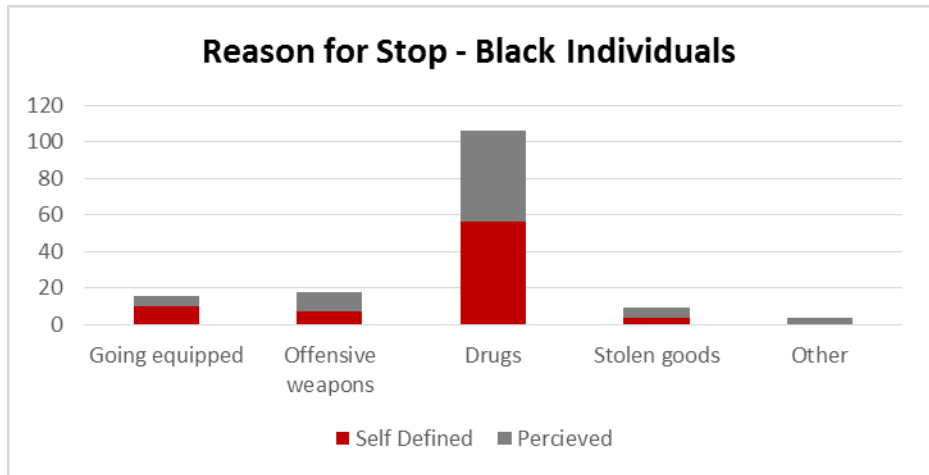


Across the same period the figures for the Metropolitan Police are 3.2 for Black individuals and 1.6 for Asian individuals.

### **3.3 Breakdown by Ethnicity – Black (Self Defined and Perceived)**

There were 77 individuals stopped this quarter who self-defined their ethnicity as black, nearly all of whom were perceived to be black by officers. A further 77 people were perceived as black and either did not state their ethnicity (63) or self-defined as coming from mixed (9) or other ethnic group (5).

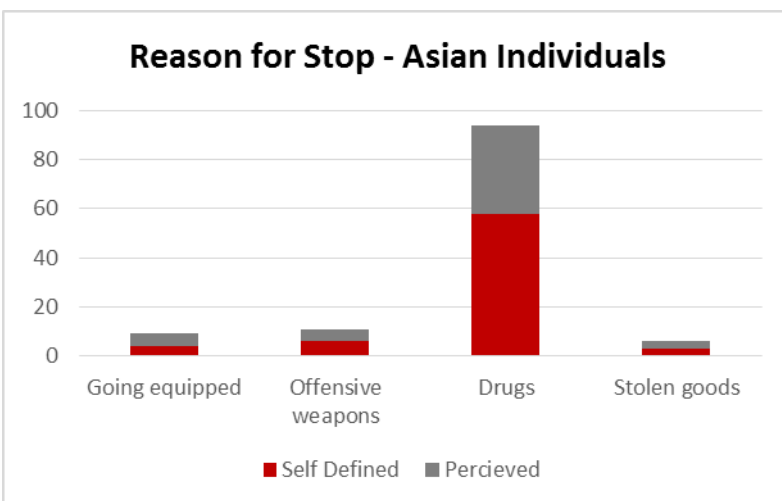
The amount of black individuals stopped in relation to stolen goods, drugs and offensive weapons doubles when perceived ethnicity is included alongside self-defined. The highest volume increase is seen with drugs stops rising from 56 to 106.



Compared the whole stop cohort for the quarter black individuals (self-defined and perceived) were more likely to be stopped for drugs (69% compared to 61%) and less likely to be stopped for going equipped or stolen property (18% compared to 29%).

Stop outcomes for both perceived and self-defined black ethnicity show 65% of individuals were no further actioned (n=100) and 29% were arrested (n=44). This is similar to the percentages for all stops; 27% arrested and 64% no further action. There were no cautions or community resolutions issued to black individuals this quarter.

### 3.4 Breakdown by Ethnicity – Asian (Self Defined and Perceived)

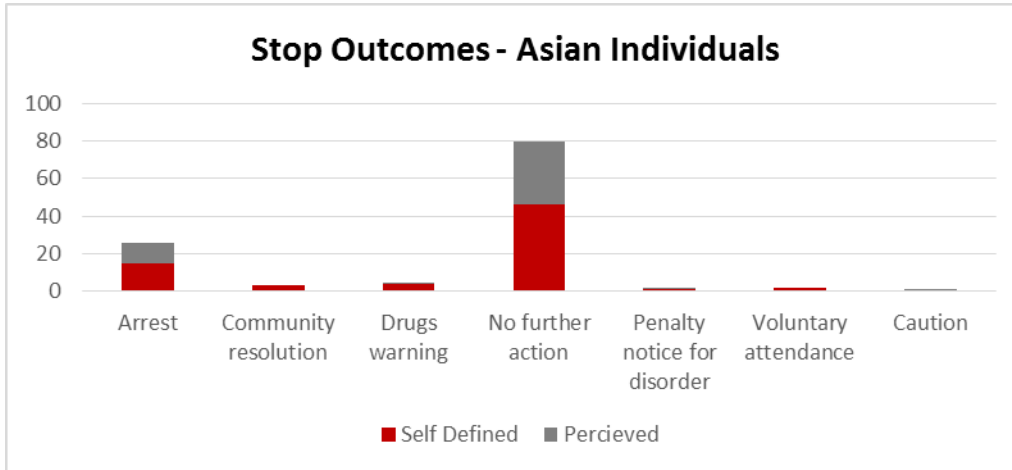


There were 71 individuals stopped this quarter who self-defined their ethnicity as Asian, most of whom were also perceived as Asian by officers. A further 53 people were perceived as Asian but 50 did not state their ethnicity and another 3 individuals self-defined as being from a mixed ethnic background.

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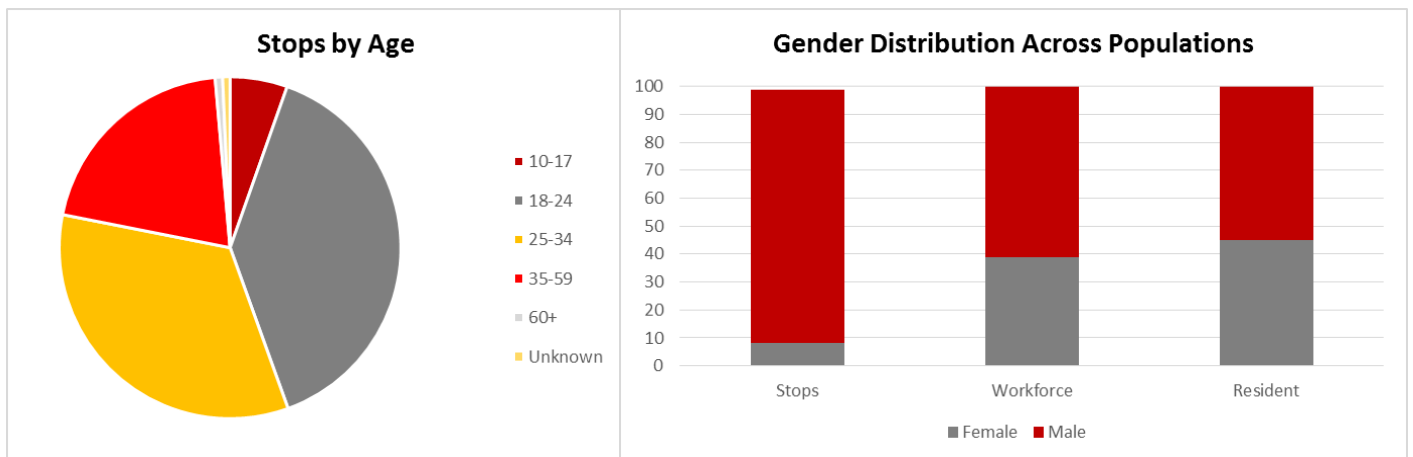
The majority of stops involving Asian individuals relate to drugs (78%, n=94) with numbers of stops in other categories being very low. The inclusion of perceived ethnicity doubles the number of stops for going equipped, stolen goods and offensive weapons.

Asian individuals are more likely to be stopped in relation to drugs (78% compared to 61%) than the overall cohort but less likely to be stopped for going equipped or stolen goods (13% compared to 29%).



Just over two thirds of all stops of Asian individuals resulted in no further action (68%, n=80) this is slightly higher than the overall rate of 64%. The percentage arrested (22%, n=26) is lower than the overall arrest rate of 27%. Almost the complete range of outcomes was applied across stops of Asian individuals with the only exception being police discretionary resolutions.

### 3.5 Age and Gender



Most people stopped are between the ages of 18 and 24 years old (39%, n=223), then 25-34 years old (34%, n=192) with few being under 18 (5%, n=31) or over 60 (n=4).

There were 31 stops of under 18s this quarter, 30 males and one female. The youngest person stopped was a 13 year old black male in relation offensive weapons, no objects were found and he was released with no further action.

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Most juvenile stops related to drugs (48%, n=15), there was one arrest made from these stops. Another arrest was made as a result of a going equipped search and these were the only two arrests of juveniles this quarter giving an arrest rate of 6%.

The no further action (NFA) rate for children was 87% (n=27) which is much higher than usual and the cohort as a whole.

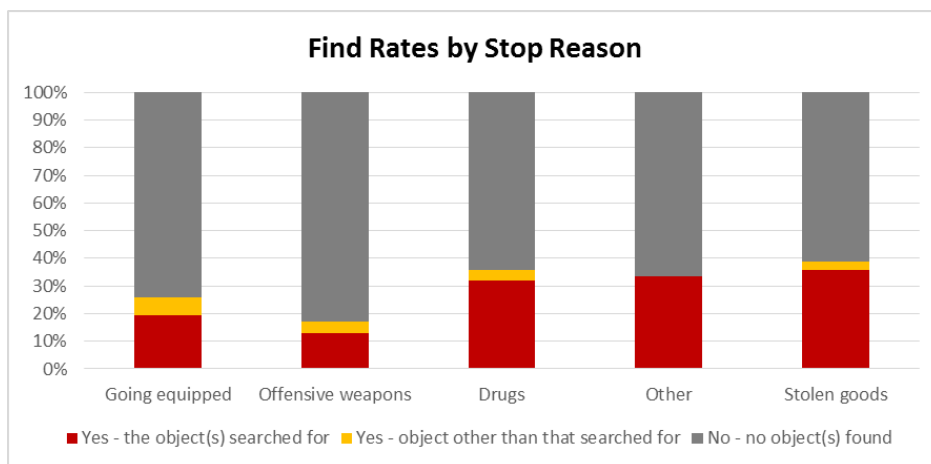
18-34 year olds were most commonly stopped in relation to drugs and those 35 and over were stopped generally for stolen goods or going equipped.

The majority of individuals stopped are male (89%, n=523) with 8% being female (n=48). This distribution is not similar to either the work force profile (61% male and 39% female) or the resident one (55% male and 45% female) with females far less likely to be stopped.

Most females (30 out of 48) were stopped in relation to drugs and the most common outcome was no further action (67%, n=32), the arrest rate for females is 27% the same as for all stops (n=13). Most arrests related to drugs (n=5) or going equipped (n=4).

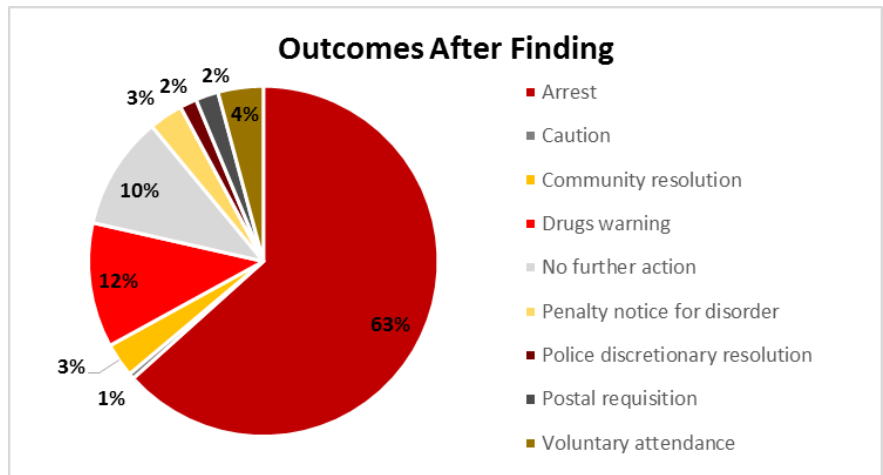
### 4.1 Outcomes – Find Rates

There were 191 searches this quarter which resulted in an object being found, 166 where the object of the search was found and 25 where something different was discovered giving a find rate of 33%. Find rates in general were highest for stolen property searches (39%, 23 out of 59 stops) this was also the type of stop where the item searched for was most commonly found (36%, 21 out of 59 stops). Levels were similarly high for drugs stops where there is a find rate of 36% (128 out of 357 stops). Find rates were lowest for offensive weapons stops with only 17% resulting in an item being found (n=8).



**CITY OF LONDON POLICE: OFFICIAL**

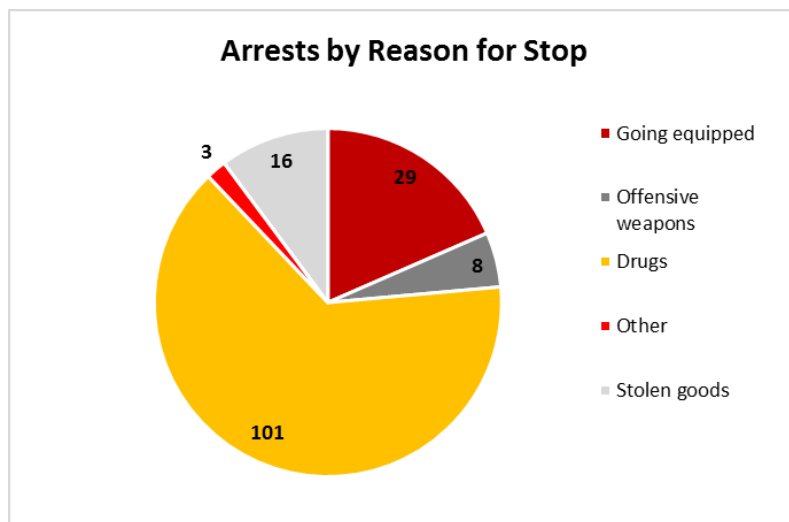
The most common outcome after finding an object was to arrest the subject of the stop (63%, n=121) then to issue a drugs warning (12%, n=22), the no further action rate after finding was 10% (n=20). This continues the trend started last quarter for low no further action rates after finding which is had previously been around 20-30%.



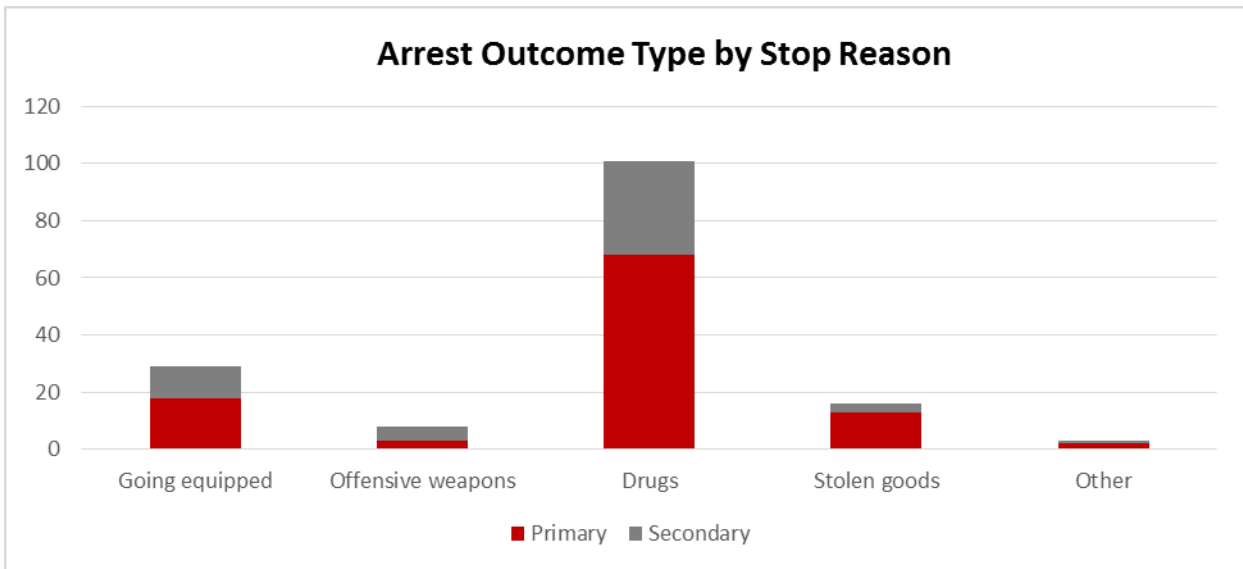
Subjects were asked to remove their outer clothing for 76 stops this quarter, mainly for drugs searches (37 stops) or going equipped searches (29 stops). There were 23 drugs searches, 2 offensive weapon, 2 going equipped and one other search that required full strip searches. Two subjects were female the remaining 26 male. Fourteen of the full strip searches resulted in objects being found (50%) and there were 9 arrests made, two drugs warnings issued and one penalty notice. The youngest person strip searched was 19 and the oldest 36.

**4.2 Outcomes – Arrests**

There were 157 arrests resulting from stop search this quarter, 27% of all stops. This is slightly lower than last quarter (31%) and remains significantly lower than previous quarters where the arrest rate has been 36% or 37%.

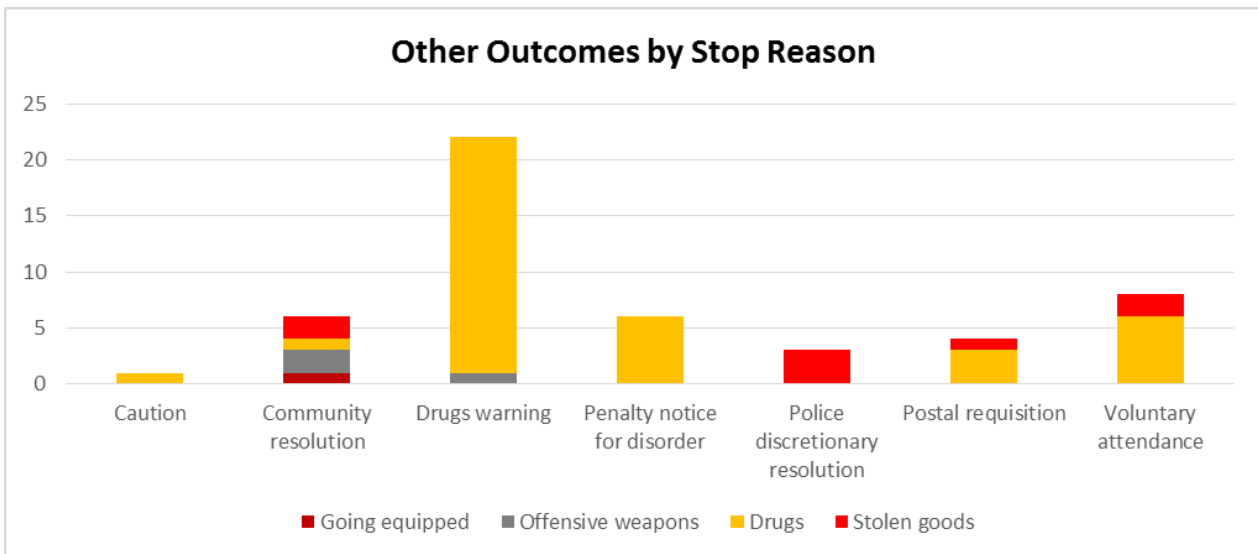


Most arrests in the current quarter resulted from drug stops (64%, n=101) or going equipped (18%, n=29). When we look at arrest rates instead of volume the arrest rate was highest for drugs (28%) followed by stolen goods and going equipped (27% each) stops.



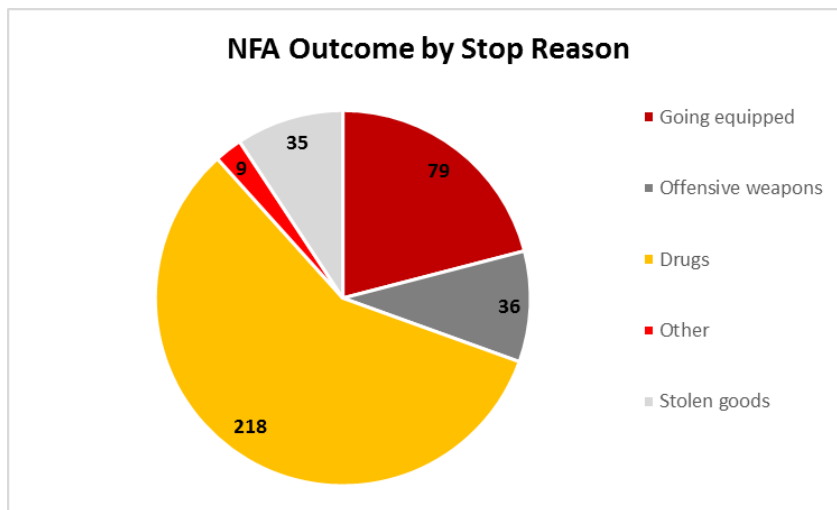
Roughly one in three arrests (34%, n=53) were the secondary outcome of the stop and as such were not related to the object of the search, this most commonly happens in the case of drug stops (33) and the rate of secondary arrests was highest for offensive weapons as 5 out of 8 arrests from these searches were for other reasons ranging from drugs possession to public order and vehicle offences.

### 4.3 Outcomes – Other



The positive outcome rate this quarter is 35% (n=207) down 2 percentage points from last quarter. Outside of arrests the most common resolution was to issue a drugs warning (22) or schedule a voluntary attendance (8) at the point of the stop. The widest range of outcomes can be seen for drugs stops where every outcome but police discretionary resolution was used this quarter. Discretionary resolutions were used solely for stolen goods searches.





The overall No Further Action (NFA) rate for stops this quarter is 64% (n=377), it is highest for offensive weapon stops (77%, 36 out of 47 stops) then going equipped (72%, 79 out of 109 stops). The NFA rate is lowest for stolen property stops (59%, 35 out of 59 stops).

## 4.4 Outcomes – Age, Gender and Ethnicity Summary

### 4.4.1 Ethnicity

The arrest rate is highest amongst black individuals (29%, 44 out of 153 stops) after this the arrest rate is highest amongst white individuals (26%, 71 out of 268 stops).

Drugs warnings were most commonly issued to white individuals as were police discretionary resolutions.

No further action rates were highest for Asian individuals (66%, 80 out of 121 stops), then black (65%, 100 out of 153 stops)

Find rates were highest amongst black individuals (34%, 52 out of 153 stops).

### 4.4.2 Age

There were four males aged over 60, between 61 and 64, stopped this quarter mostly for stolen goods, this led to one arrest, one voluntary attendance and two no further action outcomes.

Arrest rates were then highest amongst 35-59 year olds at 30% (35 out of 117 stops).

No further action rates were highest for 10-17 year olds (87%, 37 out of 31 stops).

Drugs warnings were most commonly issued to those between 18-24 years old, closely followed by 25-34. The 18-24 age group received the widest range of diversionary outcomes this quarter.

Find rates were highest for 18-24 year olds (36%, 81 of 223 stops). The find rates for 10-17 year olds is 23% (7 out of 31 stops).

There were 5 stops this quarter where the age of the subject is unknown.

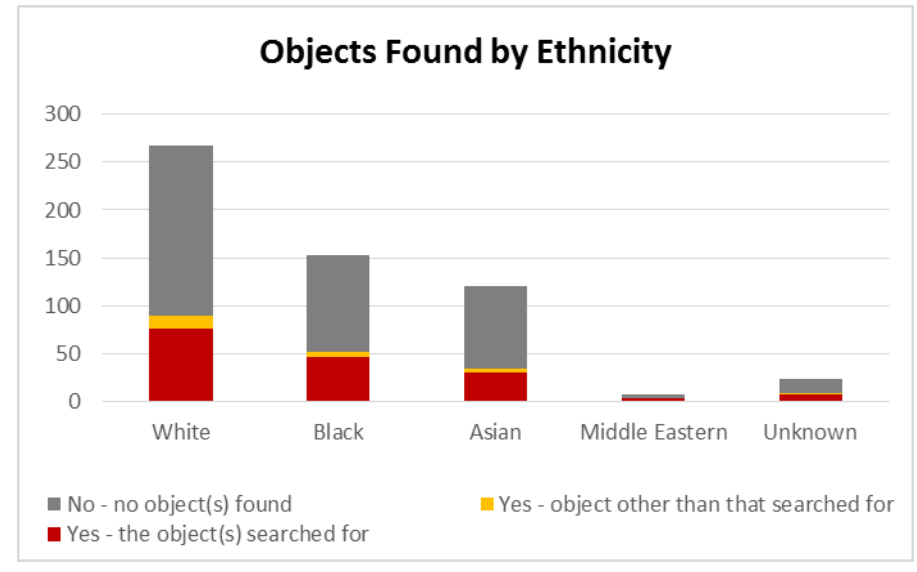
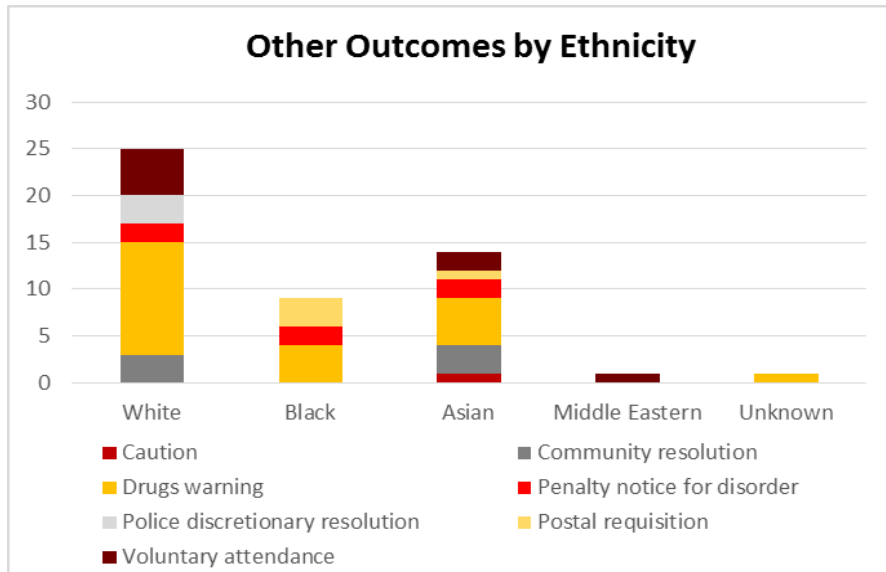
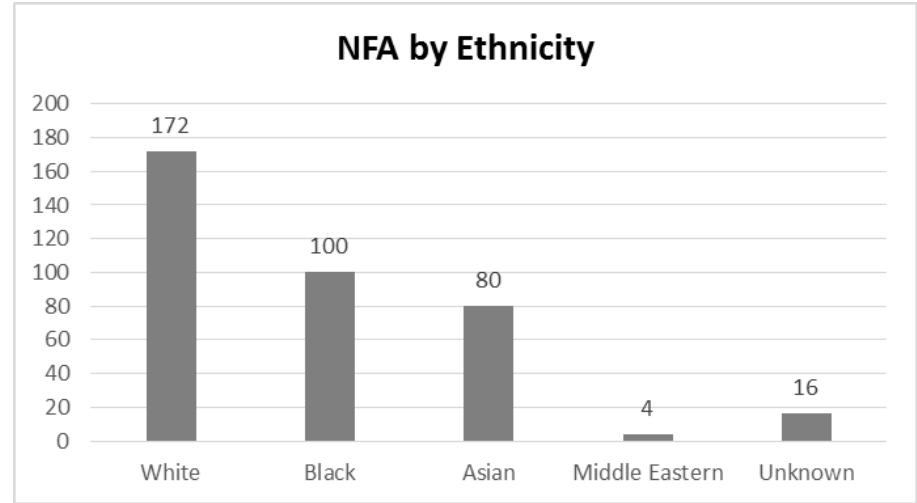
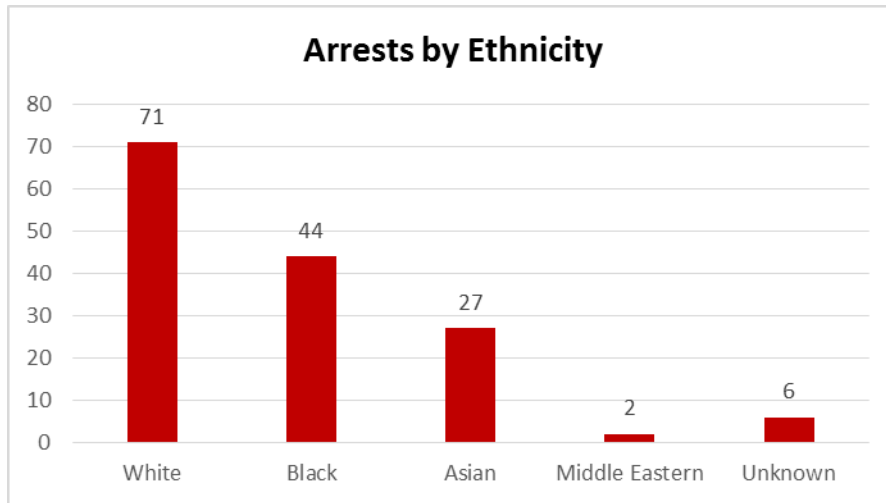
#### **4.4.3 Gender**

The arrest rate for females is 27% and for males 26%, the NFA rate for females is 67% and for males 64%.

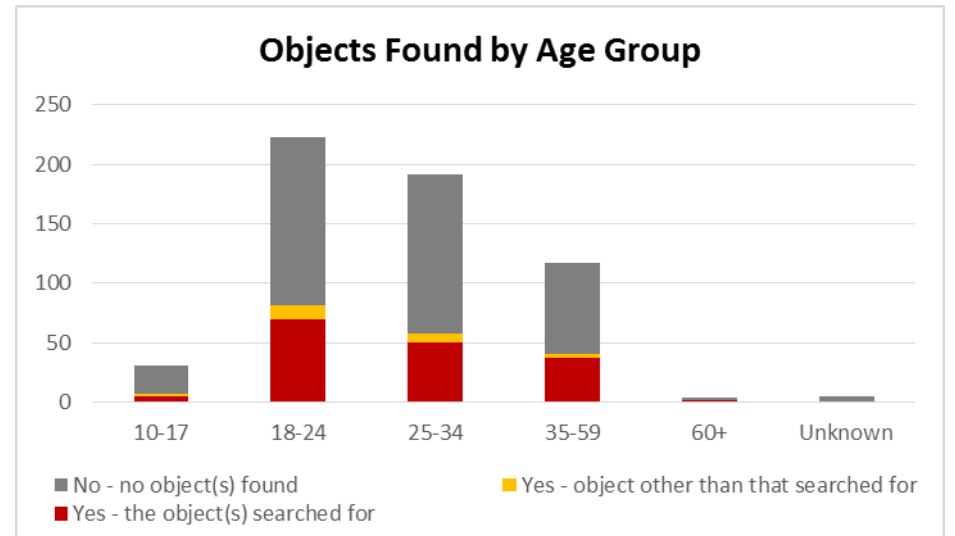
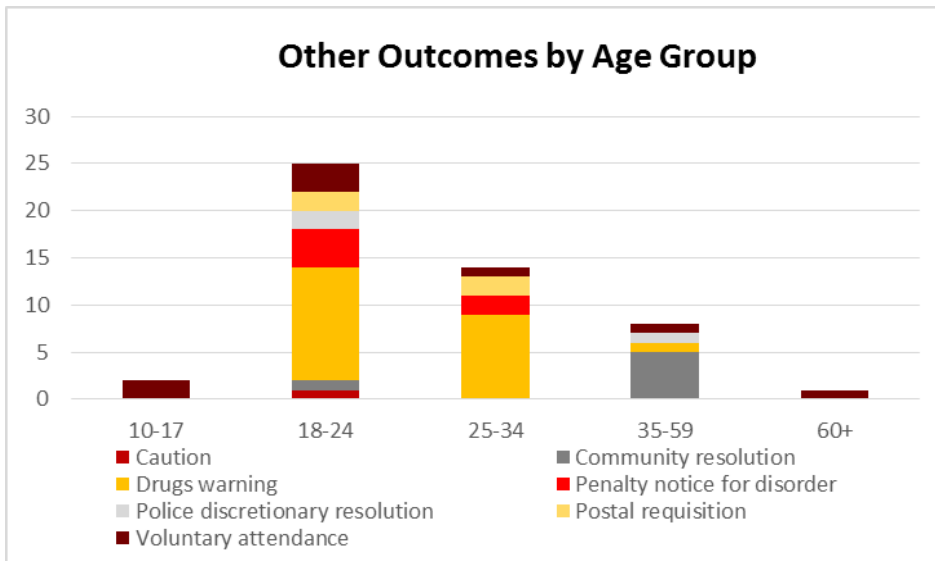
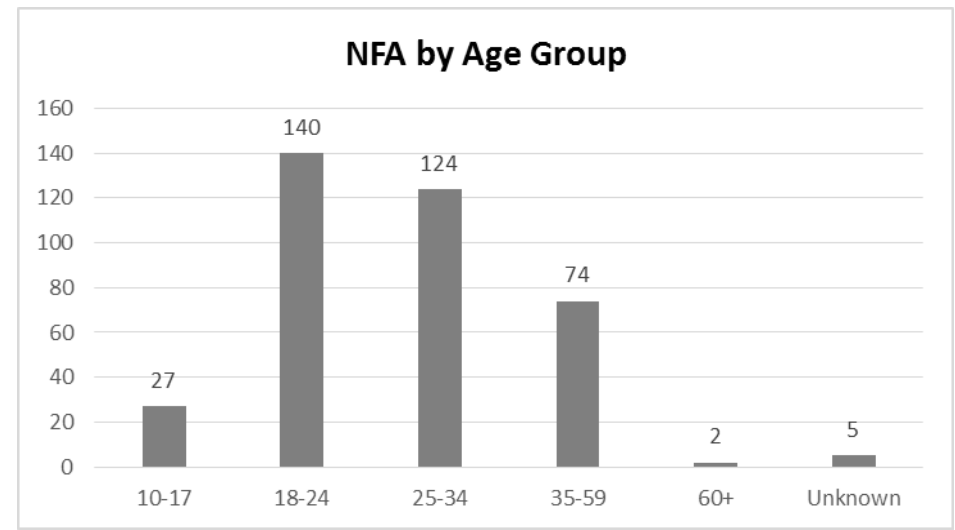
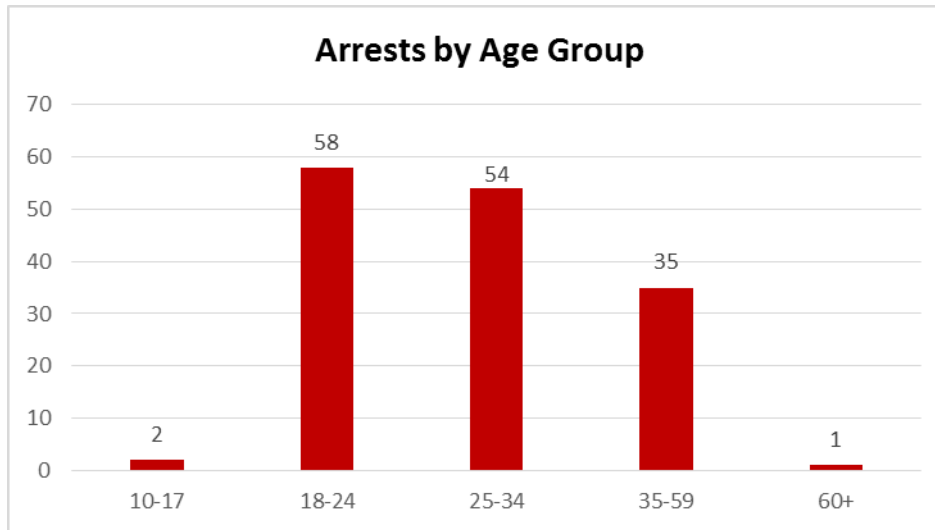
No women had a stop resulting in a caution, community resolution, postal requisition, police discretionary resolution or voluntary attendance this quarter. Two females were issued with a drugs warning and one a penalty notice, these were the only alternatives to arrest and NFA this quarter.

The find rate for females (31%, n= 15) is slightly lower than that for males (33%, n=172).

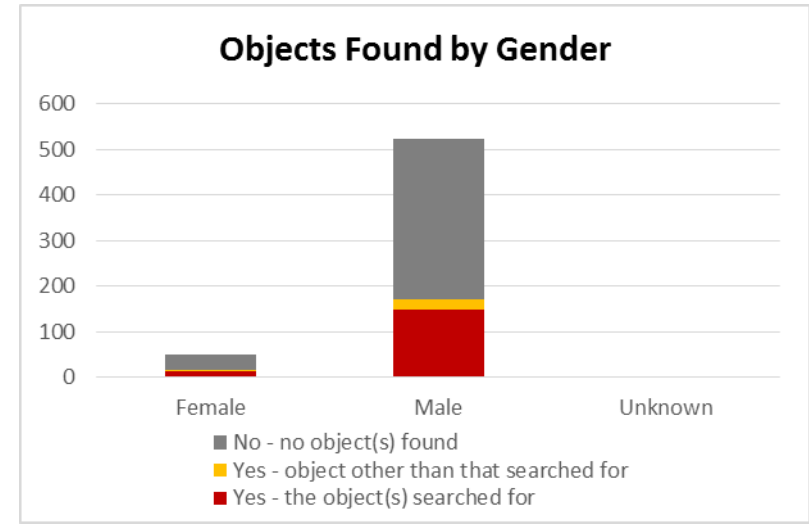
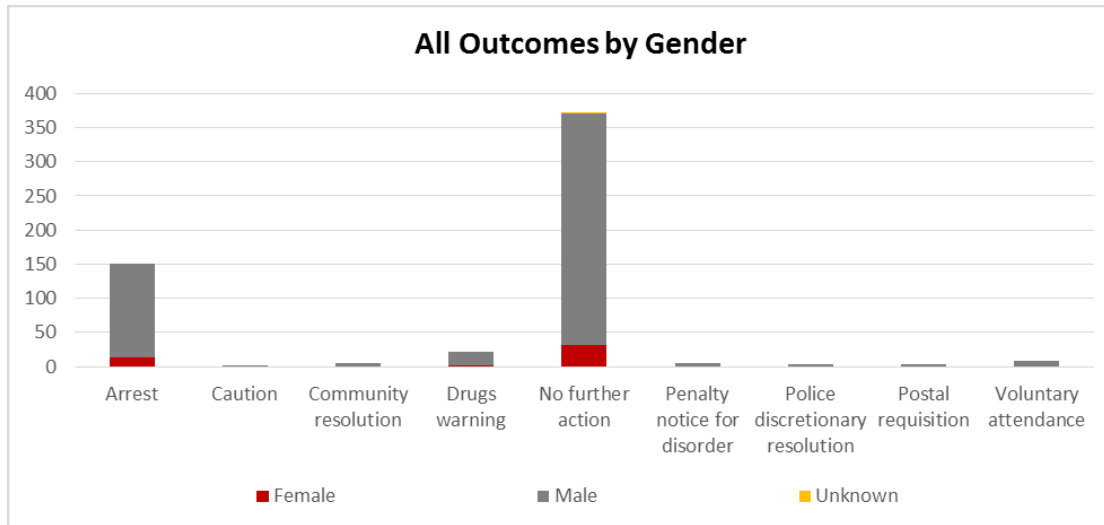
**4.5 Outcomes – Ethnicity Breakdown**



**4.6 Outcomes – Age Breakdown**



**4.7 Outcomes – Gender Breakdown**



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<b>Committee</b> Professional Standards and Integrity Committee	<b>Date:</b> 14 September 2020
<b>Subject:</b> Summary of recent Reviews of Police Complaints	<b>Public</b>
<b>Report of:</b> Town Clerk	<b>For Information</b>
<b>Report author:</b> Oliver Bolton Police Authority Team, Town Clerk's	

## Summary

This report provides a summary of the complaint reviews that have been considered by the Authority and an update on related matters.

Nearly all the reviews that the Authority has considered relate to Action Fraud. However, the number of applications for reviews received remains low compared to the number of complaints received by the force about Action Fraud and in turn, the number of complaints received remains exceptionally low compared to the number for reports made to Action Fraud.

## Recommendation

Members are asked to:

- Note the report.

## Main Report

### Background

1. On 1<sup>st</sup> February 2020, the Local Policing Bodies became responsible for making determinations on reviews of police complaints. Reviews are appeals by the complainant where they feel the response they have received to their complaint has not been handled reasonably or proportionately.
2. To fulfil this duty in line with the established governance within the Corporation, a Review Panel has been established, which meets monthly to consider the review applications. This Panel comprises the Chair of the Professional Standards and Integrity Committee and at least two other Members of the Committee.
3. In order to support this statutory duty an additional member of the Police Authority Team was recruited (Compliance Lead), whose duties include the administration of the review documentation and drafting a report of

recommendation to the Review Panel for each review, based on consideration of the relevant documentation. The Compliance Lead's other duties include management of Freedom of Information Requests and GDPR matters for the team and the management of the Custody Visitor Scheme for the City.

## **Current Position**

4. The Review Panel has met three times since being established (June, July and August) and has considered a total of 12 Reviews, six of which were upheld. All but one of the cases related to Action Fraud – most to the lack of investigation of a specific crime report. It should be noted that the number of reviews is very small compared with the number of complaints received and the number of complaints received still remains extremely low compared to the number of reports made to Action Fraud each month (30,000 to 40,000).
5. The findings, recommendations, rationale and force responses are listed in the summaries appended to this report (Appendix 1). Members should note that a formal response to recommendations is only required where a review has been upheld, and the force has 28 days to respond. However, the Panel is able to make comments or recommendations on reviews that have not been upheld, which the force can consider. In this regard, the Panel felt that the force could look to improve the quality of the responses to complainants. The Panel particularly felt that a clearer, plain English description of the process by which cases are assessed should be prepared for inclusion with responses, perhaps as a separate sheet, allowing the actual response to be short and tailored better to the specific complaint.
6. The Authority welcomes the addition of a new Inspector to the team in the force handling police complaints on Action Fraud. They have extensive experience working on economic crime and the National Fraud Intelligence Bureau (NFIB) most recently. It is hoped this experience will help provide complainants with a more meaningful, initial response.
7. There is also a further matter of which Members should be aware. Under the previous complaints regulations, complaints that were lodged solely to try and overturn a decision not to investigate a report to Action Fraud, could be non-recorded as they were deemed an abuse of the complaints system that cannot be used to overturn operational decisions. Under the current system this option is no longer available and all expressions of dissatisfaction have to be recorded. Discussions between the force and the IOPC have suggested that such complaints could be curtailed at the review stage if the complainant pursues this, as seeking to overturn the decision not to investigate is not a valid reason for a review. This approach will be clarified by the Police Authority Team with the IOPC. It should be noted that where a complainant is reviewing the explanation for why their report was not allocated for investigation by NFIB due to a lack of clarity in the explanation provided, this could still be considered a valid review, as it's the explanation they are querying, not the decision itself.



## **Conclusion**

8. The number of complaints that result in a review remains low. It is hoped that clarification with the IOPC on assessing the validity of review requests relating to the decision not to investigate a report to Action Fraud may result in fewer reviews needing to be considered by the Authority.
9. The Police Authority Team will be working closely with the Force to ensure that recommendations made by the Panel are suitably addressed.

## **Appendices**

- Appendix 1 – Recommendations made to the City of London Police from Review Panels 1,2 and 3.

### **Oliver Bolton**

Deputy Head of the Police Authority Team

T: 020 7332 1971

E: [oliver.bolton@cityoflondon.gov.uk](mailto:oliver.bolton@cityoflondon.gov.uk)

## Appendix 1 – Summary tables of Recommendations made to the City of London Police from Review Panels 1, 2 and 3. City of London Police Authority

Outcome of Review Panel Discussion held on 1<sup>st</sup> June 2020

Members present: Alderman Alison Gowman, Alderman Emma Edhem, Deputy James Thomson & Caroline Addy

Force reference	PAT reference	Panel Decision	Rationale	Recommendations to the Force	Force response
CO/175/19	CR0012020	To NOT uphold the review	While the complainant sent a lengthy request for a review, only a small part of their submission related to the eligible complaint. And in this regard, the Panel agreed that a) there had been substantial exchanges between the force and complainant explaining the relevant legislation; and b) ultimately, there is no statutory requirement on the force to investigate all crimes that are reported to it. As such, the response given by the force was reasonable and proportionate and the review should not be upheld.	<p>Despite not upholding the review in this instance, the Panel did feel that some of the responses to the complainant could be have been clearer – while acknowledging the complainant’s own submissions often lacked clarity.</p> <p>Consideration should therefore be given to asking a colleague (where possible) to check responses for clarity. Particularly where matters may be getting confused.</p> <p>Further, it was noted that the response to the complainant should have explicitly detailed why it was felt it was reasonable and proportionate.</p>	Recommendation Accepted
CO/134/19	CR0022020	To UPHOLD the review	The Panel considered the response sent to the Complainant carefully. While significant explanation was given of the process by which cases are handles by local forces, there was little detail on the assessment process that NFIB uses to determine whether to disseminate. Given the complaints’ case was not disseminated, the response they received did not reasonably address their query.	<p>The force should write to the complainant with a fuller explanation of how cases are assessed by NFIB.</p> <p>The Panel appreciated that while it might not be appropriate to unpick why specific cases have not been taken forward for investigation, a fuller explanation in more general terms may help members of the public understand why their case is not progressed.</p> <p>The force may want to consider using this form of words with other complainants (while always ensuring responses are tailored appropriately) to help improve understanding of the process and reduce feelings of dissatisfaction in the service.</p>	Recommendation Accepted

**Outcome of Review Panel Discussion held on 28<sup>th</sup> July 2020**

**Attendees: Alderman Alison Gowman, Alderman Emma Edhem, Caroline Addy and James Tumbridge.**

<b>Force Reference</b>	<b>PAT Reference</b>	<b>Panel Decision</b>	<b>Rationale</b>	<b>Recommendations to the Force</b>	<b>Force response</b>
CO/161/19	CR0032020	To NOT uphold the review	<p>While the complainant sent a lengthy request for a review, there was a lack of specificity in the complainant's original letter to the Force. As such, no specific crime could be identified, as an umbrella accusation that the system is corrupt was insufficient.</p> <p>The Panel agreed a reasonable and proportionate response was provided to the complainant, outlining Home Office Counting requirements when determining whether to record a case. Whilst reference was provided to the complainant about these rules, there was little detail on what these rules are, and the criteria used to determine whether to record a case. As such, the Panel agreed that further explanation could be provided to the complainant on this matter.</p>	<p>Despite not upholding the review, the Panel did feel that the response to the complainant could have been clearer - Particularly with regards to the Home Office Counting Rules, and the criteria used to determine whether to record a case.</p> <p>The Panel understood that while it might not be appropriate to detail why specific cases have not been taken forward for investigation, a fuller explanation to the complainant detailing what Home Office rules and how they are used to report crime would be helpful. To ensure there is complete clarity, the force may wish to consider incorporating a concise explanation of Home Office Rules with other complainants. This could help to provide complainant's with greater understanding of such rules and reduce feelings of dissatisfaction experienced across the service.</p>	[Pending]
CO/0027/20	CR0042020	To NOT uphold the review	<p>The Panel considered the response sent to the Complainant carefully. Whilst the Panel acknowledged there was a degree of misinterpretation regarding the rules and regulations permitting travel during the Covid-19 lockdown period, significant explanation was provided to the complainant detailing a) the officers' key worker status; and b) clarification of the officer's primary and secondary residences whilst the Covid-19 outbreak continued. As such, the response given by the force was reasonable and proportionate and the review should not be upheld.</p>	None.	[Pending]

CO/123/19	CR0052020	To UPHOLD the review	The complainant asked for an explanation of why their case had not been investigated. While the Panel agreed that significant explanation was given of the process by which cases are handled by local forces, there was little detail on the assessment process that NFIB uses to determine whether to disseminate. Given the complaints' case was not disseminated, the response they received did not reasonably address their query.	<p>The force should write to the complainant with a clearer and detailed explanation of the assessment process and broader criteria upon which NFIB use to assess cases. This detailed explanation should also explain how such cases are triaged.</p> <p>Additionally, responses to complainants should ensure they clearly outline the 28- day notification period in place to appeal the outcome of the resolution to complaints, as this was missing from the letter sent.</p> <p>The force should note that their response letter also reversed the complainant's surname and first name and will want to ensure this addressed in future correspondence.</p>	[Pending]
CO/61/19	CR0062020	To NOT uphold the review	The complainant submitted a short and generic expression of dissatisfaction, rather than a specific complaint. In this regard, the Panel agreed that no specific crime could be identified. The complaint was centred around assertions of a systemic flaw and inadequacy on the part of Action Fraud. As such, the Panel considered the response sent to the complainant in a generic context. The Panel agreed that the response given by the force was reasonable and proportionate, as it provided a broad and high-level response addressing the complainant's principle concerns about Action Fraud.		[Pending]
CO/18/20	CR0072020	To UPHOLD the review	The Panel acknowledged that the apology, and overall explanation given by the force on the overall process NFIB uses to determine whether to disseminate cases for investigation was appropriate. Additionally, the Panel agreed that	The force should write to the complainant in clear terms and explicitly clarify whether their case was assessed, as this is not clear. Additionally, the force should provide a detailed	[Pending]

			the language in the response provided by the force presented the impression that the complainant's case was not appropriately assessed and deliberately not progressed. The letter states that the case was 'unfortunately not disseminated', which makes it sound like an error, as it might not have been disseminated as it wasn't assessed in the first place. As such the response they received did not adequately address the complainant's expression of dissatisfaction.	explanation on how the sums lost by the victim are considered as part of the case assessment.	
CO/62/20	CR0082020	To UPHOLD the review	<p>The complainant asked for an explanation of why their case had not been investigated. While the Panel agreed that significant explanation was given of the process by which cases are handled by local forces, there was little detail on the assessment process that NFIB uses to determine whether to disseminate a case to a local force.</p> <p>In addition, the Panel agreed that the language used when explaining why the complainant's case was not disseminated implies a mistake had been made in the handling of this case, rather than a robust assessment process taking place. Given the complainant's concerns were predominately centred around the lack of detail provided about the dissemination of this case, the response received did not adequately address this main point.</p>	The force should write to the complainant with a clearer and detailed explanation of the assessment process and broader criteria upon which NFIB use to assess cases. This detailed explanation should also explain how such cases are triaged.	[Pending]

#### **Generic Recommendations**

- The Panel thought the force may wish to consider utilizing more empathetic language in response to complainants, as this could help to reduce the chances of antagonising complainants further. It could also help to reduce complainant's feelings of dissatisfaction experienced across the service - particularly in relation to any standard text produced about the NFIB assessment criteria and Home Office Counting Rules. The Panel felt this could have been improved across requests received where the decision has been taken to uphold reviews.
- The Police Authority Team are happy to review any drafts and tailored responses regarding the above, and around the triaging and assessment process undertaken in the handling of Action Fraud complaints.

**Outcome of Review Panel Discussion held on 13<sup>th</sup> August 2020**

**Attendees: Alderman Alison Gowman, Alderman Emma Edhem, Alderman Gregory Jones and Mary Durcan**

<b>Force Reference</b>	<b>PAT Reference</b>	<b>Panel Decision</b>	<b>Rationale</b>	<b>Recommendations to the Force</b>	<b>Force response</b>
CO/22/30	CR0092020	To NOT uphold the review	The Panel considered the response sent to the complainant carefully. They agreed that the complainant was provided with a detailed and empathetic response to their complaint. Additionally, it was also felt that the points raised by the complainant had been sufficiently replied to in a reasonable and proportionate way.	<p>Despite not upholding the review, the Panel did feel that aspects of the letter to the complainant were quite formulaic and could have been better tailored.</p> <p>To ensure there is complete clarity, The Panel also felt the force may wish to consider the use of more every-day language that complainants can understand. Particularly when explaining the steps involved in the ‘dissemination’ of cases to Police forces. The Panel felt use of the terms ‘allocated’, ‘referred’ or ‘sent’ would be more appropriate in response letters to complainants.</p>	[Pending]
CO/69/20	CR0102020	To NOT uphold the review	The Panel agreed the response provided to the complainant regarding lost money in a scam was detailed and empathetic. Additionally, the Panel agreed reasonable and proportionate response was provided to the complainant in relation to the victim referral, given the concerns the complainant raised regarding their safety. The Panel were satisfied that there was nothing further the force could do to explain why this case was not allocated for investigation.	<p>Despite not upholding this review in this instance, the Panel did feel that the response to the complainant could have been clearer and more precise – Particularly with regards to the victim referral process that took place. The Panel appreciated that while it might not be appropriate to unpick why specific cases have not been progressed for investigation, a simple explanation of the victim referral process should be outlined. This would help to improve understanding of the process and reduce feelings of dissatisfaction in the service.</p> <p>There should be no use of Latin in responses to the public (e.g. Prima facie).</p>	[Pending]

				Further, it was noted that the response to the complainant should have explicitly detailed why it was felt it was reasonable and proportionate.	
CO/44/20	CR0112020	To UPHOLD the review	The Panel acknowledged that the apology and overall explanation given by the force on the overall process NFIB uses to determine whether to disseminate cases for investigation was appropriate, however much of the response provided to the complainant is focused on this. The complainant also raised specific points regarding a) their dissatisfaction experienced with the service provided by Action Fraud; and b) lack of specialist support received for vulnerable victims of crime. Given the complainant's detailed account of emotional distress encountered by his relative and vulnerability concerns raised, the response they received did not reasonably address their concerns.	<p>The force should apologise to the complainant for the quality of the original report taken by the Action Fraud call handler, and the lack of response regarding the complainant's original complaint. Additionally, the force should outline the actions CoLP and Concentrix have taken to address the issues raised by the Times expose to help rebuild some confidence in the system.</p> <p>The force should also provide a fuller explanation of the NFIB assessment process and the Home Office Counting Rules and explanations as to how they are used to record crime.</p> <p>Additionally, explanation should also be provided to the complainant about the course of action CoLP and Concentrix have taken to address the issues raised by the Times exposé.</p>	[Pending]
CO/10820	CR0132020	To UPHOLD the review	The Panel agreed that the response provided to the complainant was empathetic. While the Panel agreed that a significant explanation as given of the process by which cases are handled by local forces, there was little detail on a) the criteria NFIB uses to assess reported fraud; and b) the assessment process that NFIB uses to determine whether to allocate a case for investigation. As such, the Panel agreed that further explanation could be provided to the complainant across both matters.	<p>The force should provide the complainant with a more detailed explanation of the NFIB assessment process and Home Office Counting Rules and explanation as to how they are used to record crime.</p> <p>The force should also provide the complainant with information about pursuing his lost cash through the civil claims court.</p>	[Pending]

### **Generic Recommendations**

- The Panel recommends force ensures responses to complainants specifically outline that a reasonable and proportionate response has been taken in the handling of each case.
- The Panel thought the force should incorporate a more useful form of words that avoids implying action taken by the force was the wrong course of action. Particularly regarding the use words 'unfortunately' and 'sorry'.
- The Panel recommends that the force produces a short (one-pager) summary of the process by which cases are considered and allocated to forces, written in plain and simple terms (perhaps with some simple graphics), which could be included on all relevant responses. This would allow the actual response to the complainant to be shorter and better tailored to the points raised.



<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Date:</b> 14 <sup>th</sup> September 2020
<b>Subject:</b> Integrity and Code of Ethics Update	<b>Public</b>
<b>Report of:</b> Commissioner of the City of London Police	<b>For Information</b>
<b>Report author:</b> Head of Strategic Development, City of London Police	

## Summary

A version of this report was submitted to your Police Authority Board on 29<sup>th</sup> July 2020 and has been updated to incorporate a draft of the Integrity Standards Development Plan (being considered by the Force's Integrity Standards Board on the 15<sup>th</sup> September).

### *Integrity Standards Board:*

The Force's Integrity Standards Board (ISB) last met on 26<sup>th</sup> February 2020 and was reported to the PS&I Committee. The meeting scheduled for June 2020 was cancelled. The next meeting will take place on 15<sup>th</sup> September 2020 and depending on the government guidance in force at the time will probably be via telephone conference with some people in the office. As it takes place immediately after your Committee, it is not possible to provide the usual update. The ISB dashboard will be circulated for Members' information separately following its consideration at ISB.

### *Code of Ethics Update:*

There have not been any London Police Challenge Forums (LPCF) since December 2019. A date was scheduled for April 2020 for a re-launch of the LCPF (at which it was to be rebranded to the Police Ethics Engagement Forum), however that was cancelled following the Covid-19 lockdown. The Head of Strategic Development has met virtually the Metropolitan Police Service (MPS) Co-ordinator of the LCPF on a number of occasions to explore effective ways that these events can take place remotely, however, it will rely on all participant having access to MS Teams or similar, which is in the process of being rolled out to City of London Police (CoLP) personnel.

The Regional and National meetings have managed to operate remotely, with discussions dominated by issues relating the Covid-19 situation (e.g. the impact on the quality of decision making in the face of rapidly shifting priorities, changing to legislation and enforcement of guidance). The next national meetings is scheduled to take place on 13<sup>th</sup> October 2020.

The Integrity Standards Development Plan has been reviewed by the Head of Strategic Development. As the last ISB was cancelled it has not yet been considered by the Force, however, in anticipation of it being agreed on 15<sup>th</sup> September, it is included here in draft form for Members' information.

The plan includes progress against areas for improvement (AFIs) identified by HMICFRS<sup>1</sup> that are relevant to the PS&I Committee. Only 1 action that has been rolled forward remains AMBER, and relates to the introduction of new software in Force.

### **Recommendation(s)**

Members are asked to note the report.

### **Main Report**

#### **Current Position**

##### *Integrity Standards Board*

1. 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 the Professional Standards and Integrity (PS&I) Committee and a representative from the Town Clerk's department.
2. The last board was held on 26<sup>th</sup> February 2020. A meeting was scheduled for June, however, following the Covid-19 lockdown a number of force meetings were temporarily halted, with ISB being one such meeting. Depending on Government guidance in force at the time, the next meeting, which will take place on the same day as your Committee, is likely to be 'virtual', in common with most other meetings currently. Despite the June meeting not taking place, the Force continued to gather the data for the dashboard, which has been reviewed outside of the normal meeting structure by the Head of Strategic Development to ensure there was nothing critical that required specific Force intervention.
3. The current dashboard will be considered at the ISB being held the day after your Committee, therefore it is not possible to provide Members with an overview of the ISB on this occasion. The data for the dashboard was still being collated by the deadline for your Committee. Following discussion at the ISB, the dashboard will therefore be circulated outside of the meeting for Members' information.

##### ***Code of Ethics Update***

4. There have not been any London Police Challenge Forums (LPCF) since December 2019. A date was scheduled for April 2020 for a re-launch of the LCPF (at which it was to be rebranded to the Police Ethics Engagement Forum), however that was cancelled following the Covid-19 lockdown.

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<sup>1</sup> Her Majesty's Inspectorate of Constabularies, Fire and Rescue Services

5. During May, an attempt was made to run a phone-in discussion to test the viability of it running as a concept in place of physical meetings, however, it was felt that the free-flowing nature of the discussion and rapid exchange of thoughts that normally takes place at the LPCF was hampered by the medium to such a degree that it did not work effectively.
6. The Head of Strategic Planning has met virtually the MPS Co-ordinator of the LPCF on numerous occasions to explore other methods of holding these meetings, including using video applications such as Teams or Zoom. It has been agreed in principle that this will be trialled as soon as all relevant (or a sufficient number) personnel have access to these applications on their work machines. The rollout of this technology began on September 1<sup>st</sup> and is ongoing.
7. Within the MPS (who lead on the LPCF), the senior officer who led on the initiative has been promoted and moved to a different force. The MPS is in the process of deciding where responsibility for integrity and ethics sits, with a strong current preference for it to be their Professional Standards Directorate (it had been sited independently of that Directorate, similar to the current position in CoLP).
8. During April 2020, the Head of Strategic Development took part in an online meeting with the Institute of Business Ethics, who are developing a new ethics training guide for use by private and public sector organisations. When complete, the Force will be provided with a copy, which will be reviewed for best practice that the City of London Police can make use of. This is expected by the end of the year.

### ***Regional Police Ethics Network and UK Police Ethics Guidance Group***

9. No physical meetings of the Regional Police Ethics Network or the UK Police Ethics Guidance Group have taken place since the last report to the PS&I Committee. Both groups have, however, managed to operate remotely.
10. The last UK Police Ethics Guidance Group (UKPEGG) was held on 23<sup>rd</sup> April 2020 as a telephone conference. It was the first one to be hosted by the new NPCC lead, who is the Deputy Chief Constable of Dorset Police. It was a much shorter event than usual, with the main points of business concerning the publication of national guidance relating to sexual harassment in the workplace, and noting that the College of Policing (in attendance) are now leading on revising the National Police Code of Ethics. No timescales were provided regarding how long this is expected to take. The next national meeting is scheduled to take place on 13<sup>th</sup> October 2020.
11. The Regional Police Ethics Network usually meets a few days before the UKPEGG so that any outcomes can be fed into the national forum, however, the April meeting was cancelled due to Covid and was not held remotely. The latest meeting of the regional group took place on 1<sup>st</sup> July 2020 using Skype. No new date has yet been set for the next regional meeting, but is likely to be immediately prior to the 13<sup>th</sup> October.

12. The meeting covered the following points:

- a. The impact Covid-19 is having on decision making due to rapidly changing legislation, shifting priorities and issues relating enforcing guidance.
- b. It was noted that member forces had temporarily halted their internal boards (a couple had held 1), but these were slowly being re-introduced as organisations adapt to different ways of working.
- c. Publication of the regional group's annual report, which is expected over the next month.
- d. Referral of a dilemma to the UKPEGG, raised by the British Transport Police relating to competing priorities impacted by closing a railway line.
- e. Decision to hold an 'on-line' regional conference during October 2020.

13. The group also heard how 2 members of the group (the ACC of Dorset Police and a Professor of Criminology and Ethics) have been involved in national briefing meetings, advising boards on the ethical impact of proposals and decisions.

### ***Integrity Standards Development Plan***

14. The Integrity Standards Development Plan has been reviewed by the Head of Strategic Development, however, the cancellation of the last ISB means it has not been considered by the members of that group and has not therefore been through any Force governance processes. It will be considered for the first time at the ISB being held on the 15<sup>th</sup> September; however, so that Members do not have to wait for the next PS&I Committee it is attached here as a draft for information.

15. Members will note the amber area in Part 1 of the plan, this is purely due to the cancellation of the last ISB. Part 2, the development section, has the section on progress against areas for improvement (AFIs) identified by HMICFRS<sup>2</sup> that are relevant to the PS&I Committee carried over. It will remain in the plan until all AFIs are fully delivered. Currently, the only element that remains outstanding relates to the introduction of new counter corruption software in Force.

**Stuart Phoenix**

Head of Strategic Development

T: 020 7601 2213

E: [Stuart.Phoenix@cityoflondon.pnn.police.uk](mailto:Stuart.Phoenix@cityoflondon.pnn.police.uk)

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<sup>2</sup> Her Majesty's Inspectorate of Constabularies, Fire and Rescue Services

**Suitable for Publication**

# **POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2020-21 September 2020 update**



## Suitable for Publication

### 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			
	Nov 19	Feb 20	Jun 20	Sep 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	AMBER	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			
	Nov 19	Feb 2020	Jun 20	Sep 20
2.1 Consider with HR/OD taking part in the long term 'ethical drift' survey	RED	CLOSED		CLOSED
2.2 Consider an internal board to advise on and review key decisions and processes	CLOSED	CLOSED		CLOSED
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	WHITE	GREEN		Delivered
2.4 Arrange an independent peer review of organisational integrity arrangements	AMBER	GREEN		Delivered
2.5 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assesment report when published.	AMBER	AMBER		AMBER
<b>NEW MEASURES FROM SEPTEMBER 2020</b>				
2.1 Work with Corporate Communications to re-promote the work of the London Police Challenge Forum (LCPF) and improve awareness of the Police Code of Ethics				NEW
2.2 Work with the MPS Coordinator to revise the LPCF Terms of Reference				NEW
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements				NEW
2.4 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assesment report when published ( <i>carried forward</i> )				AMBER

**PERFORMANCE REPORT**

Traffic Light Colour	Definition of measure achievement
<b>GREEN</b>	Aim is achieved in date and to level set.
<b>AMBER</b>	Current projections indicate this measure will not be met unless this additional action taken
<b>RED</b>	No progress on measure or deadline/level has not been met and it is unlikely will be met.
<b>WHITE</b>	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 (Sep 2020)	Nov 19	Feb 20	Jun 20	Sep 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. <b>There was no meeting during June/July, due to Covid restrictions.</b>	GREEN	GREEN	AMBER	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 <sup>th</sup> December 2019 (none since that date)	GREEN	GREEN	GREEN	GREEN
1.6 Maintain a process to support the Force’s participation in the London Panel Challenge Forum (Ethics Associates)	Process maintained, but no meetings organised during 2020 due to Covid restrictions, but Force is capable of participating when organised.	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
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



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<b>1. Development Measures</b>	
<b>MEASURE</b>	<b>2.1 1</b> Work with Corporate Communications to re-promote the work of the London Police Challenge Forum (LCPF) and improve awareness of the Police Code of Ethics
<b>OWNER</b>	Head of Strategic Development / Corporate Communication
<b>AIM/RATIONALE</b>	Focus groups conducted as part of the Integrity Peer Review highlighted the need for improved marketing and awareness raising of the Code of Ethics and work of the LCPF.
<b>MEASUREMENT</b>	Head of Strategic Development to provide ISB with details of activities supporting this indicator
<b>DUE BY</b>	December 2020
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Articles published Amber: Activity in train (within due time) but not delivered. Red: No activity and past due datearticipation
<b>TRAFFIC LIGHT</b>	
<b>CURRENT POSITION</b>	
<b>NEW ACTION</b>	

**Suitable for Publication**

<b>1. Development Measures</b>	
<b>MEASURE</b>	<b>2.2</b> Work with the MPS Coordinator to revise the LPCF Terms of Reference
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	The Integrity Peer Review noted that the terms of reference of the LPCF had not been updated since the group's formation in 2016 and require amending.
<b>MEASUREMENT</b>	Revised Terms of Reference agreed by constituent organisations of the LPCF.
<b>DUE BY</b>	December 2020
<b>TRAFFIC LIGHT CRITERIA</b>	Green: TORs produced and agreed by due date; AMBER: work in train within the due date; RED: TORs not produced by due date
<b>TRAFFIC LIGHT</b>	
<b>CURRENT POSITION</b>	
NEW ACTION	

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2 Development Measures	
<b>MEASURE</b>	<b>2.3 Conduct an annual review of the Force integrity programme and implement identified improvements</b>
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	To ensure the Force continues to develop its approach to integrity and has plans to embed best practice.
<b>MEASUREMENT</b>	Review completed and reported to ISB
<b>DUE BY</b>	September 2021
<b>TRAFFIC LIGHT CRITERIA</b>	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.
<b>TRAFFIC LIGHT</b>	
<b>CURRENT POSITION</b>	
Action replicated for 2021. The amendments in this version of the development plan represent the results of the Integrity Review that took place late 2019/early 2020.	

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2 Development Measures	
<b>MEASURE</b>	<b>2.4 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assessment report</b>
<b>OWNER</b>	Head of Strategic Development (and any other relevant individual identified by the report)
<b>AIM/RATIONALE</b>	To ensure the Force actions best practice identified by HMICFRS.
<b>MEASUREMENT</b>	Progress reported to Performance Management Group and ISB
<b>DUE BY</b>	<b>March 2020</b>
<b>TRAFFIC LIGHT CRITERIA</b>	Green: All AFIs delivered; Amber: Action in progress to deliver AFIs but not fully delivered; Red: AFI not delivered by due date
<b>TRAFFIC LIGHT</b>	<b>AMBER</b>
<b>CURRENT POSITION</b>	
<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><b>AFI 7 and 8 – the Force should review is external scrutiny of use of force and stop and search</b></p> <p><b>AFI 9 – the Force should extend its unconscious bias training to all its officers</b></p> <p><b>AFI 10 – The Force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up to date and include current data</b></p> <p><b>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.</b></p> <p><b>August 2019 update:</b> 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 (18<sup>th</sup> September) providing details of the Force’s response to these AFIs. This indicator will remain open until all actions have been delivered.</p> <p><b>February 2020 update:</b> 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 11<sup>th</sup>. 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>	

## **Suitable for Publication**

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.

### **September 2020 Update**

**AFIs 7, 8, 9 and 10** are all now delivered and GREEN (reported to PAB in July 2020).

**AFI 11** – remains AMBER. The only outstanding element of this AFI relates to the implementation of new counter corruption software in Force. It is shown as AMBER because the Force master action plan shows the due date to be end of September 2020, which the Force is working to. After that date, it will be RED. There are clear sensitivities relating to such software, therefore a fuller update can be provided by the Detective Superintendent PSD in the non-public section of your Committee.

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