



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

Date: FRIDAY, 5 FEBRUARY 2021

Time: 10.00 am

Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

Members:

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

Enquiries: John.Cater@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/kEM9CHs2ZyI>

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. **MINUTES**
To agree the public minutes of the meeting held on 26th November 2020.

For Decision
(Pages 1 - 10)
4. **REFERENCES**
Joint report of the Town Clerk and Commissioner.

For Information
(Pages 11 - 14)
5. **ANNUAL REVIEW OF TERMS OF REFERENCE**
Report of the Town Clerk.

For Decision
(Pages 15 - 18)
6. **12 MONTH REVIEW OF THE COMPLAINT REVIEW PROCESS**
Report of the Town Clerk.

For Information
(Pages 19 - 36)
7. **ACTION FRAUD AND NATIONAL FRAUD INTELLIGENCE BUREAU COMPLAINTS**
Report of the Commissioner of the City of London Police.

For Information
(Pages 37 - 40)
8. **OFFICERS ON TEMPORARY AND ACTING PROMOTION**
Report of the Commissioner of the City of London Police.

For Information
(Pages 41 - 42)
9. **COVID-19 FIXED PENALTY NOTICES (FPNS) AND STOP AND SEARCH UPDATE**
Report of the Commissioner of the City of London Police.

For Information
(Pages 43 - 52)

10. **AVENUES OF APPEAL**
Report of the Commissioner of the City of London Police.
- For Information**
(Pages 53 - 54)
11. **INTEGRITY AND CODE OF ETHICS UPDATE**
Report of the Assistant Commissioner of the City of London Police.
- For Information**
(Pages 55 - 58)
12. **POLICE INTEGRITY DEVELOPMENT AND DELIVERY PLAN REPORT 2020-21 - JANUARY 2021 UPDATE**
Report of the Commissioner of the City of London Police.
- For Information**
(Pages 59 - 68)
13. **INDEPENDENT OFFICE FOR POLICE CONDUCT - POLICE COMPLAINTS STATISTICS FOR ENGLAND AND WALES 2019/20**
- For Information**
(Pages 69 - 104)
14. **GLOSSARY - ALLEGATION TYPES (PRE AND POST 1ST FEB 2020 FOLLOWING CHANGES TO POLICE CONDUCT REGULATIONS)**
Report of the Commissioner of the City of London Police.
- For Information**
(Pages 105 - 112)
15. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
16. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
17. **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**
18. **NON-PUBLIC MINUTES**
To agree the non-public minutes of the meeting held on 26th November 2020.
- For Decision**
(Pages 113 - 116)

19. **NON-PUBLIC REFERENCES**
Joint report of the Town Clerk and Commissioner.
- For Information**
(Pages 117 - 118)
20. **ACTION FRAUD/NFIB PRESENTATION**
Report of the National Fraud Intelligence Bureau
- For Information**
(Pages 119 - 126)
21. **NATIONAL FRAUD INTELLIGENCE BUREAU (NFIB)- FULFILMENT LETTERS**
Report of the National Fraud Intelligence Bureau.
- For Information**
(Pages 127 - 140)
22. **ACTION FRAUD STATISTICS – QUARTER 3 – 1ST OCTOBER 2020 - 31ST DECEMBER 2020**
Report of the Commissioner of the City of London Police.
- For Information**
(Pages 141 - 148)
23. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 3 –1ST OCT 2020 – 31ST DEC 2021**
Report of the Commissioner of the City of London Police.
- For Information**
(Pages 149 - 166)
24. **PROFESSIONAL STANDARDS DIRECTORATE CASES**
Report of the Commissioner of the City of London Police.
- For Information**
(Pages 167 - 168)
- a) Cases assessed as not conduct or performance issue - no case to answer / not upheld (Pages 169 - 180)
- b) Local Resolution (Pages 181 - 182)
- c) Cases dealt with under Complaint and Conduct Regulations 2019 (Pages 183 - 198)
25. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

26. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

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**PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE OF THE CITY OF
LONDON POLICE AUTHORITY BOARD
Thursday, 26 November 2020**

Draft Minutes of the meeting of the Professional Standards and Integrity Committee of the City of London Police Authority Board held virtually, via Microsoft Teams, on Thursday, 26 November 2020 at 11.00 am

Present

Members:

Alderman Alison Gowman (Chair)
Douglas Barrow
Nicholas Bensted-Smith
Tijs Broeke
Mary Durcan
Alderman Emma Edhem
Deborah Oliver
Deputy James Thomson
James Tumbridge

Officers:

| | | |
|----------------------|---|----------------------------------------------|
| Angela Roberts | - | City of London Police |
| Oliver Bolton | - | Town Clerk's Department |
| Alistair Sutherland | - | City of London Police |
| Gary Brailsford-Hart | - | City of London Police |
| Stuart Phoenix | - | City of London Police |
| James Morgan | - | City of London Police |
| Tarjinder Phull | - | Comptroller & City Solicitor's Department |
| Craig Mullish | - | City of London Police |
| Martina Elliot | - | NFIB |
| Stuart Phoenix | - | City of London Police |
| John Cater | - | Committee Clerk |
| Polly Dunn | - | Committee Clerk |

1. APOLOGIES

Apologies were received from Caroline Addy and Alderman Jones.

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

There were no declarations.

3. MINUTES

Mr Tumbridge asked the Committee clerk to ensure that his name was recorded in the minutes as having attended the 14th September 2020 meeting - his name was currently absent.

RESOLVED - that the public minutes (including the amendment above) of the meeting held on 14 September 2020 be approved.

4. **REFERENCES**

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

14/2019/P - Integrity Dashboard and Code of Ethics Update

Future meeting dates of London Police Challenge Forum to be provided to the Committee.

- No meetings are currently arranged. Members asked that this was kept as a standing item and that they would be informed should a meeting date be confirmed.

17/2019/P – Police Authority Process for Handling Complaints

Appeals Process New Review Panel Process to be reviewed after three months of operation.

- The review would be submitted to the Committee at its next meeting in February 2021.

20/2019/P – Ethical Economic Partnerships Policy

Ethical Economic Partnerships Policy to be reviewed by Professional Standards and Integrity Committee after one year of operation.

- An update was included in the pack for today's meeting. Members requested that, going forward, updated versions should be submitted on an annual basis.

1/2020/P – Integrity Dashboard and Code of Ethics Update

Case studies arising from London Police Challenge Forum Meetings to be circulated to Committee

- See 14/2019/P – once a meeting is held, case studies will be circulated to the Committee.

2/2020/P – Integrity Dashboard and Code of Ethics Update

Committee to be advised when next Victim Satisfaction Survey will be conducted

- The next Victim Satisfaction Survey would be submitted to the Committee, for information, at its next meeting in February 2021.

3/2020/P – Integrity Dashboard and Code of Ethics Update

Force Human Resources to provide report to June 2020 meeting on statistics of temporary promotions at all levels of Force

- A Report was included in the pack for today's meeting.

4/2020/P – COVID-19 FPNs

NPCC Policing the Pandemic to be circulated to the Committee

- The Chairman asked the Town Clerk to circulate the NPCC Policing the Pandemic to the Committee after today's meeting.

5/2020/P – Stop and Search Q1 2020/21

Force to review provision of breakdown by ethnicity/age of 235 stops outside City

- A Report was included in the pack for today's meeting concerning stop and search. breakdown of the figures

6/2020/P – Stop and Search Q1 2020/21

Written response to be prepared addressing issues raised by observing Member

- This was picked up on today's agenda (ITEM 7)

7/2020/P – Summary of Reviews of Police Complaints

Action Fraud Complaints Manager to attend November 2020 Committee

- The Action Fraud Complaints Manager was in attendance at today's meeting.

8/2020/P – Summary of Reviews of Police Complaints

Report on other avenues of appeal to be submitted to Committee

- The Report would be submitted to the Committee at its next meeting in February 2021.

9/2020/P – Questions – Recruitment of External Member

Recruitment process to be reviewed to ensure diverse pool of experienced candidates is identified.

- Officers explained that the Job Description (JD) still required some work; the documentation had not been updated for some time and would need to be refined before we could go out to advertise the role; officers were keen to consult Members next month (December), possibly at the Police Authority Board meeting on 16/12 to ensure that they were content with the new JD.
- In terms of a timeline, officers were working at pace to ensure that interviews were able to take place in early 2021. Members thanked officers for their work on this, whilst they were eager to press on speedily, it was important to be thorough and get this right.
- Once the JD had been agreed, it was critical that the advertisement was circulated to as wide a pool of potential candidates as possible, the Chair

asked her fellow Members to provide details to officers of any relevant portals or forums that the advert could be shared with.

- Members were also supportive of asking the Police Authority Board to waive the usual stipulation when appointing external Members (i.e. they had to live or work in the City); it was felt that this unnecessarily restricted the potential pool.

10/2020/P - IASG reports to be submitted to PSI Committee

- IASG would be meeting Members of the Committee in 2021.

RESOLVED – that the Committee noted the Report

5. OFFICERS ON ACTING AND TEMPORARY PROMOTION AT 30/11/2020

The Committee received a Report of the Commissioner of the City of London Police concerning Officers on Acting and Temporary Promotion.

The Assistant Commissioner explained that the number of Officers on acting and temporary promotion was significantly higher than the historic norm due to the Force waiting for the shape of the Transform Model to be concluded in early 2021. Currently, when vacancies have arisen, the Force have turned to internal recruits as this is the best way to ensure it was in good shape to roll out the new model quickly and effectively in 2021; the Assistant Commissioner anticipated that, once the model was in place, the numbers in the Report would decline, as the Force reverted to normal methods of application and recruitment.

The Assistant Commissioner assured Members that vigorous vetting is applied, and individuals would always fill roles that were appropriate to them; furthermore, supervision is robust and is no different to the normal line manager – direct report relationship.

The Chair thanked the Assistant Commissioner for the briefing and asked him to return with an update at the next meeting of the Committee in February.

RESOLVED – that the Committee noted the Report.

6. Q2 STOP AND SEARCH DATA - 2020-21

The Committee received a Report of the Commissioner of the City of London Police concerning Stop and Search Data for Q2.

Members took ITEM 6 and ITEM 7 together.

A Member queried the outcome rates on page 30. In response, officers, whilst pointing out that CoLP was the best performing Force in the UK in terms of positive and judicial outcomes post arrest (28%), cautioned Members that the data within the Report needed to be set in context; once an arrest was made, it could result in a range of eventualities, which did not, in and of itself, negate the overall effectiveness and efficacy of Stop and Search as a tactic in the City.

Indeed, Her Majesty's Inspectorate of Constabulary's (HMIC) recent study found that 92% of the City of London Police's Stop and Searches were deemed reasonable – this was the highest rate across all UK Forces. Whilst the picture was nuanced, the Assistant Commissioner confirmed that he would look to provide clearer explanation on the data in future.

Members queried whether the statistics concerning Stop and Search based on ethnicity could be presented in percentage terms going forward. Officers responded that they would liaise with the Stop and Search Working Group and bring a revised data set to the Committee in the future. It was agreed that some training would be offered to Committee members on this important topic of stop and search so that they could better understand and scrutinise the data and operations. This would be arranged around a meeting of the Committee in the New Year

RESOLVED – that the Committee noted the Report.

7. **STOP AND SEARCH DATA BREAKDOWN**

The Committee received a Report of the Commissioner of the City of London Police concerning Stop and Search Data. This response would be sent separately to the member of Common Council who raised these matters at the meeting on 14th September.

Please see the Minute for ITEM 6.

RESOLVED – that the Committee noted the Report.

8. **USE OF ALGORITHMS AND AI WITHIN CITY OF LONDON POLICE**

The Committee received a Report of the Commissioner of the City of London Police concerning the use of algorithms and AI.

Members welcomed the Police's cautious approach to the adoption of AI and were keen that the Force continued to track and monitor developments, particularly when it came to national or international approaches to establishing best practice in this area. Whilst this was, for now, at an embryonic stage, the technology (such as facial recognition) continues to evolve and the ethical concerns are becoming more apparent. A Member proposed that a separate session on Data Ethics, which outlined some of the concerns and potential risks that would likely emerge as the technology matured would be useful. Officers would set up a session in 2021. At least two members of the Committee had specialist knowledge in this area which it would be good to utilise.

Separately, the Chair added that she had been reassured about the Force's approach to algorithms in its procurement of a successor system to Action Fraud.

RESOLVED – that the Committee noted the Report.

9. **EQUALITY AND INCLUSION STRATEGY UPDATE**

The Committee received a Report of the Commissioner of the City of London Police concerning the Equality and Inclusion Strategy, noting that this now fell within the remit of this Committee.

The Draft (non-public) Equality and Inclusion Action Plan was circulated separately as a supporting document to this Item; this document will be finalised soon and will be circulated to Members thereafter.

In response to a query concerning recruitment and retention, the Assistant Commissioner responded that current trends for widening representation were positive and are on an upward curve. The Force is now fifth in the country for police representation from BAME communities and is also very well placed in terms of civilian staff representation; this reflected a proactive approach over recent years. Whilst the Force was now working from a good and stable base the Assistant Commissioner conceded that the number of female specials had declined recently, and more work was required to turn this around. He added that diversity amongst the Force's cadets was in a very good place, with 27 of 36 recent cadets coming from a BAME background.

In response to concerns around prioritisation, officers stressed that this was a process that would take time to mature; whilst it was unrealistic to expect all areas to be resolved in one go, officers were committed to ensuring the strategy was adopted in full and successful over the longer term.

A Member highlighted some wording on page 91 concerning the creation of a "Gold Group in response to the Black Lives Matter movement" – and asked whether the wording could be changed to something more understandable to the lay person. Officers recognised that too much jargon was unhelpful and, when finalising the Action Plan, would cut down on acronyms and other esoteric terminology where possible.

In response to a query around the feedback from focus groups and the recent staff meeting, officers confirmed that this has been embedded into the strategy. The Force's upcoming communications about the strategy would include both the raw survey results alongside how this has been built into the work.

RESOLVED – that the Committee noted the Report.

10. **INTEGRITY AND CODE OF ETHICS UPDATE**

The Committee received a Report of the Commissioner of the City of London Police concerning the Integrity and Code of Ethics.

Officers provided a brief update; it should be noted that due to the pandemic not a huge amount of work has been undertaken recently in this area.

In the potential continued absence of a London Police Challenge Forum (LPCF) meeting over the medium-term, officers would look at trying to run an internal CoLP only session to ensure that momentum around best practice was kept fresh and top of mind.

RESOLVED – that the Committee noted the Report.

11. **IOPC REVIEW INTO STOP AND SEARCH, REPORT ON THE METROPOLITAN POLICE SERVICE**

The Committee received a Report of the Commissioner of the City of London Police concerning the IOPC Review into Stop and Search.

Members took ITEM 11 and ITEM 12 together.

The Chair welcomed the offer from an officer to provide a training session for Members concerning Stop and Search; it was envisaged that this would take place in the New Year. The Chair would work with officers in the Force and Town Clerks to confirm a time convenient to the Committee.

RESOLVED – that the Committee noted the Report.

12. **ACTION PLAN: TRANSPARENCY, ACCOUNTABILITY AND TRUST IN POLICING**

Please see the Minute for ITEM 11.

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

A Member raised a question concerning whether the Force had yet received notification about the National Association of Legally Qualified Chairs' recent motion to potentially suspend tribunal panels in response to the risk of panel Members being considered personally liable for decisions they take in tribunal (and as a consequence subject to costs), concerning equality claims.

The Association wanted either the regulations to be changed or an indemnity to be put in place to cover panel members.

The Assistant Commissioner informed Members that notification had only been received earlier in the week; the Force's legal department was examining this issue and would come back to Members shortly with guidance.

Officers added that the subject of indemnity was something that had been looked at previously by the Force as a potential component of wider Corporation indemnity for employment tribunal panel members. Members asked that a Report be submitted to the Police Authority Board summarising the position.

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

There was no other business.

15. **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 Local Government Act.

16. **NON-PUBLIC MINUTES**
RESOLVED - that the non-public minutes of the meeting held on 14 September 2020 be approved.
17. **NON-PUBLIC REFERENCES**
Members received a joint report of the Town Clerk and Commissioner regarding non-public references.
18. **CITY OF LONDON POLICE ETHICAL PARTNERSHIPS**
The Committee received a Report of the Commissioner of the City of London Police concerning CoLP Ethical Partnerships.
19. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 2 - 1ST JULY 2020 – 30TH SEPT 2020**
The Committee received a Report of the Commissioner of the City of London Police concerning Professional Standards Statistics for Q2.
20. **PROFESSIONAL STANDARDS DIRECTORATE CASES**
The Committee received a Report of the Commissioner of the City of London Police concerning Professional Standards Statistics – Quarter 2 – 1 July 2020 – 30 September 2020
- 20a **Case to Answer / Upheld**
Members considered cases with a case to answer/upheld.
- 20b **No case to answer/not upheld**
Members considered cases with no case to answer/not upheld.
- 20c **Local Resolution**
Members considered cases dealt with by local resolutions.
- 20d **Death or Serious Injury**
Members considered cases involving death or serious injury.
- 20e **Complaint and Conduct Regulations 2019**
Members considered cases dealt with under Complaint and Conduct Regulations 2019.
21. **ACTION FRAUD STATISTICS – QUARTER 2 – 1ST JULY 2020 – 30TH SEPT 2020**
The Committee considered a Report of the Commissioner of the City of London Police concerning Action Fraud Statistics for Q2.
22. **NFIB CASES ASSESSMENT PROCESS**
The Committee received an oral update and slide presentation concerning the National Fraud Intelligence Bureau (NFIB) cases assessment process.
23. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no questions.

24. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

There was one item of non-public urgent business.

The meeting ended at 1.05 pm

Chairman

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

PUBLIC OUTSTANDING REFERENCES

| | | | | |
|-----------|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 14/2019/P | 18 September 2019 Item 6 – Integrity Dashboard and Code of Ethics Update | Future meeting dates of London Police Challenge Forum to be provided to the Committee. | Head of Strategic Development | STANDING ITEM No meetings are currently arranged. Members asked in November 2020 that this was kept as a standing item and that they should be informed if a meeting date is confirmed |
| 17/2019/P | 29 November 2019 Item 5 – Police Authority Process for Handling Complaints Appeals Process | New Review Panel Process to be reviewed after three months of operation. | Town Clerk | IN PROGRESS Due February 2021 |
| 1/2020/P | 2 March 2020 Item 5 Integrity Dashboard and Code of Ethics Update | Case studies arising from London Police Challenge Forum Meetings to be circulated to Committee | Head of Strategic Development | IN PROGRESS No update at present (see 14/2019/P) |
| 2/2020/P | 2 March 2020 Item 5 Integrity Dashboard and Code of Ethics Update | Committee to be advised when next Victim Satisfaction Survey will be conducted | Head of Professional Standards | IN PROGRESS Due February 2021 |
| 8/2020/P | 14 September 2020 | Report on other avenues of appeal to be submitted to Committee | Police Authority Team | IN PROGRESS Due February 2021 |

PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

CITY OF LONDON POLICE: SUITABLE FOR PUBLICATION - RECIPIENT ONLY

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|-----------|----------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|-----------------------------------------------------------------|
| | Summary of Reviews of Police Complaints | | | |
| 9/2020/P | 14 September 2020 Questions – Recruitment of External Member | Recruitment process to be reviewed to ensure diverse pool of experienced candidates is identified. | Police Authority Team | IN PROGRESS Update due in February 2021 |
| 10/2020/P | 14 September 2020 Questions – External Scrutiny | IASG reports to be submitted to PSI Committee | Police Authority Team | IN PROGRESS IASG Members to meet PS&I Members in 2021 |
| 11/2020/P | 26 November 2020 Item 5 - Officers on Acting and Temporary Promotion at 30/11/2020 | The Chair thanked the Assistant Commissioner for the briefing and asked him to return with an update at the next meeting of the Committee in February. | Assistant Commissioner | IN PROGRESS Update due in February 2021 |
| 12/2020/P | 26 November 2020 Item 6 – Q2 Stop and Search Data | Members queried whether the statistics concerning Stop and Search based on ethnicity could be presented in percentage terms going forward. Officers responded that they would liaise with the Stop and Search Working Group and bring a revised data set to the Committee in the future | Superintendent Operations, Uniform Policing | IN PROGRESS Due in February 2021 |
| 13/2020/P | 26 November 2020 Item 8 – Use of Algorithms and AI across the City of London Police | A Member proposed that a separate session on Data Ethics, which outlined some of the concerns and potential risks that would likely emerge as the technology matured would be useful. Officers would set up a session in 2021. At least two members of the Committee had specialist knowledge in this area which it would be good to utilise. | Police Authority Team/ Director of Information (CISO & DPO)/Town Clerk | IN PROGRESS Due Spring 2021 |

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

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|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|---------------------------------------------------------------------|
| 14/2020/P | 26 November 2020 Item 9 – Equality and Inclusion Strategy Update | The Draft (non-public) Equality and Inclusion Action Plan was circulated separately as a supporting document to this Item; this document will be finalised soon and will be circulated to Members thereafter. | Head of Strategic Development | IN PROGRESS Due February 2021 |
| 15/2020/P | 26 November 2020 Item 11 – IOPC Review into Stop and Search at the Metropolitan Police | The Chair welcomed the offer from an officer to provide a training session for Members concerning Stop and Search; it was envisaged that this would take place in the New Year. The Chair would work with officers in the Force and Town Clerks to confirm a time convenient to the Committee. | Force/Town Clerks | IN PROGRESS Date to be established in February/March 2021 |
| 16/2020/P | 26 November 2020 Questions – RE: Legally Qualified Chairs - risk of panel Members being considered personally liable for decisions they take in tribunal (and as a consequence subject to costs), concerning equality claims | The Assistant Commissioner informed Members that notification had only been received earlier in the week; the Force’s legal department was examining this issue and would come back to Members shortly with guidance. Officers added that the subject of indemnity was something that had been looked at previously by the Force as a potential component of wider Corporation indemnity for employment tribunal panel members. Members asked that a Report be submitted to the Police Authority Board summarising the position. | Assistant Commissioner | IN PROGRESS Update to PS&I due February 2021 |

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Agenda Item 5

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|---------------------------------------------------------------------------------------------------------------|----------------------------------|
| Committee(s) Professional Standards and Integrity (City of London Police Authority Board) Committee | Dated: 5 February 2021 |
| Subject: Annual Review of Terms of Reference | Public |
| Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly? | 3, 8 & 10 |
| Does this proposal require extra revenue and/or capital spending? | N |
| If so, how much? | N/A |
| What is the source of Funding? | N/A |
| Has this Funding Source been agreed with the Chamberlain's Department? | N/A |
| Report of: The Town Clerk | For Decision |
| Report author(s): Polly Dunn, Senior Committee and Member Services Officer | |

Summary

This report calls for the annual review of the Committee's own Terms of Reference, for recommendation to the Board for final approval.

Recommendation(s)

Members are invited to:

- consider the proposed change in membership of the Committee;
- approve, subject to any comments, the terms of reference of the Committee (as set out in **appendix 1**) for submission to the City of London Police Authority Board for final approval; and
- consider whether any change is required to the Committee's frequency of meetings.

Main Report

1. Each sub-committee of any Grand Committee of the Court of Common Council is provided an opportunity to consider the relevance and effectiveness of its own Terms of Reference in the discharging of its delegated responsibilities.
2. There are no substantial changes proposed to the PSI Committee Terms of Reference for the next municipal year. However, the Board had previously considered amending each of its Committee's memberships, to include up to two external Members (to be appointed by the Police Authority Board).

3. The draft terms of reference are provided within the appendix for your consideration. Additions are underlined and redactions are ~~struck-through~~.
4. The Committee is also invited to review the frequency of its meetings. At present the Committee is scheduled to meet on a quarterly basis.

Corporate & Strategic Implications

5. Members should consider the current scope of the Board's Terms of reference, and bear in mind the impact of any proposed changes, particularly resource, legal and equalities implications.

Conclusion

6. Amendments to the Terms of Reference are put forward for the consideration of Members, for onward approval by the City of London Police Authority Board.

Appendix 1 – Draft Terms of Reference of the Professional Standards and Integrity Committee 2021/22

Polly Dunn

Senior Committee and Member Services Officer

E: Polly.Dunn@cityoflondon.gov.uk

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
- Up to two external co-opted Members, 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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| Committee: Professional Standards and Integrity Committee of the City of London Police Authority Board – For Information | Dated: 05/02/2021 |
| Subject: 12 Month Review of the Complaint Review Process | Public |
| Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly? | 1 |
| Does this proposal require extra revenue and/or capital spending? | No |
| If so, how much? | N/A |
| What is the source of Funding? | N/A |
| Has this Funding Source been agreed with the Chamberlain’s Department? | N/A |
| Report of: Town Clerk | For Information |
| Report author: Oliver Bolton, Deputy Head of Police Authority Team, Town Clerk’s | |

Summary

Since the City of London Police Authority became the Review Body for police complaints in February 2020, 25 Reviews have been considered and determined. Members have been trained in the relevant legislation. The process by which cases are assessed and reports presented to Members has been largely effective. Improvements have been made to the handling of recommendations made by the Panel that should be evident in the future Review Panel meetings.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. On 1st 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 this Committee.

3. During the initial disruption caused by the Covid-19 restrictions, the terms of reference for the Review Panel were temporarily altered to allow the Chair to make a determination in consultation with other panel members, as at the time, it was not clear how the disruption caused by the pandemic would effect running committee business. Once arrangements for handling remote committee business were more embedded, the Panel returned to its original terms with the Panel being responsible for determinations.
4. 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.
5. It is a requirement in the Regulations that those determining the Review outcomes have relevant training. To this end a series of training sessions was organised for Members (provided by an external provider). The most recent of these was recorded so it is available for Members or officers to refresh their memory of any key points.

Current Position

Signposting

6. Initially, those receiving a response to their complaint were advised to seek a review via the Professional Standards Directorate in the force, who would then forward on the request to the Authority. This allowed the force to easily track those complainants that were seeking a review and then forward on the relevant documentation to the Police Authority. However, this was soon revised, so that complainants seeking a review are advised to contact the Authority directly, as this is more in keeping with the intention of the regulations, whereby the review process is (and should be seen to be) independent from the force.
7. The Authority has also recently implemented a regular (monthly) meeting with PSD to ensure that there is a smooth handover of cases and material to ensure that none has been missed. This followed one case that had unfortunately been overlooked during a particularly busy period in the summer. It is hoped that this additional check will help avoid instances of this occurring in the future.

Preparing the cases

8. Once requests for a review are received, the Compliance Lead officer acknowledges receipt and assesses the case to ensure that it is a valid request against the criteria outlined in the legislation. For valid requests, the relevant case file information is then requested from the force and a report is prepared summarising the case with a recommendation on whether to uphold the review with a supporting rationale and possible recommendations for the force. The reports for the month are then collated and submitted to the Review Panel for

consideration ahead of their meeting. Most reports have been completed within three weeks of receipt. However, more complex cases can involve considerably more material to consider and engagement with the investigation officers in the force to determine the key facts of a case for presentation. This can also include engagement with contacts in the Independent Office for Police Conduct, to ensure the correct interpretation of the case and key material is being made.

9. Feedback from the Panel Members has been largely positive on the format on the reports submitted to them, with only some refinement of the presentation of the key dates. It is not currently proposed to make any alterations to this template. However, the team is always open to suggestions on how it can be improved.

Review Panels

10. The Review Panel has met on eight occasions, with the requisite composition being fulfilled on each occasion, with attendance spread well across the Committee Membership.
11. Currently, dates for the Review Panels are set at monthly intervals and Member availability confirmed nearer the date of each meeting. While good participation has been seen from Members across the Committee, it might be that a rota system maybe a more equitable way to arrange the Panels. The team would be happy to hear Member views on this.

Handling Recommendations

12. When upholding a Review, the Panel can make recommendations to the force, which the force has 28 days to consider. There is no obligation to accept the recommendations although an explanation should be provided if any are not being accepted. The Panel can also make recommendations to the force when they are not upholding a Review although these are not formally covered in the legislation and usually relate to addressing procedural points rather than specifics of an individual case.
13. The process by which recommendations are made, communicated to the force and responses received and presented back to the Panel, is the area that has taken longer to streamline. However, recent discussions with the force have resulted in a smoother process and Members should see the benefits of this with updates at future panels. Also, for reference, a table of the outcomes and recommendations to date is included in Appendix 1.
14. One particular development which should be noted is a working group established by PSD with the National Fraud Intelligence Bureau to help address recommendations from the Panel relating to complaints about Action Fraud. It is hoped that this will ensure that key issues are addressed effectively. However, the complexities of updating elements of the Action Fraud process and communications can mean that updates can take some time to implement.

15. Additionally, there are issues raised by the Panel that have been escalated by the force through existing channels to the force's Organisational Learning Forum, where matters relating to force policy and procedure are discussed and changes agreed and implemented. This is a useful demonstration how the independent review process can form an important link in the development and improvement of the service the force provides.

Key Data

16. Below is a table summarising the subject matter of the cases received to date and the number in each category and proportion upheld.

| Total Number of Reviews Considered: 25 | | |
|----------------------------------------|------------------------------|---------------|
| Subject Matter of Cases | Number of Reviews Considered | Number Upheld |
| Action Fraud | 21 | 14 |
| Stop and Search | 1 | 0 |
| Police Powers, policies and procedures | 3 | 1 |

Corporate & Strategic Implications

Strategic implications – None.

Financial implications – None.

Resource implications – None.

Legal implications – None.

Risk implications – None.

Equalities implications – None.

Climate implications – None.

Security implications – None.

Conclusion

17. While this process has been new and required a number of changes in the way the Authority operates in this policy area, the process has been effective in fairly determining the outcome of the reviews of complaints received. Improvements have been made to ensure cases are not missed and that recommendations are more promptly circulated and reported back to the Panel, which should be evident shortly.

Appendices

- Appendix 1 – Table of all Review outcomes and recommendations made by the panel with force response.

Oliver Bolton

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Appendix 1.

| Force Reference | PAT Reference | Date of Complaint | Date of Review Panel | Review Panel Decision | Recommendations for the Force | Date of Follow-up response by Force. | Force Response To Recommendations | |
|-----------------|---------------|-------------------|---------------------------------------------|-----------------------|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------|
| Page 24 | CO/175/19 | CR0012020 | 17/03/20 (Complaint submission to Force) | 01/06/20 | To NOT uphold the Review | <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> | None. | Recommendation accepted. |
| | CO/134/19 | CR0022020 | 05/05/20 (Complaint submission to Force) | 01/06/20 | To UPHOLD Review | <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. The force may want to consider using this form of words with other complainants (while always ensuring</p> | 18/08/20 | Recommendation accepted. |

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| | | | | | responses are tailored appropriately) to help improve understanding of the process and reduce feelings of dissatisfaction in the service. | | |
| CO/161/19 | CR0032020 | 29/02/20 (Complaint Submission to IOPC). | 28/07/20 | To NOT uphold the Review | <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> | None | This is noted, and we will provide the HOCR Home. Office link in ongoing letters. |
| CO/0027/20 | CR0042020 | 01/05/20 (Complaint submission to Force). | 28/07/20 | To NOT uphold the review | None. | None | None. |
| CO/123/19 | CR0052020 | 02/02/20 (Complaint Submission to IOPC). | 28/07/20 | To UPHOLD Review | 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 | 18/08/20 | Some further information provided in relation to the role of NFIB. The complainant was advised that due to operational sensitivity, details could not be provided. |

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| | | | | | <p>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 is addressed in future correspondence</p> | | (Copy letter provided to PA). |
| CO/61/19 | CR0062020 | 04/06/20 (Complaint Submission to IOPC). | 28/07/20 | To NOT uphold the review | None. | None | None. |
| CO/18/20 | CR0072020 | 24/04/20 (Complaint submission to Force). | 28/07/20 | To UPHOLD the review | <p>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 explanation on how the sums lost by the victim are considered as part of the case assessment.</p> | 09/09/20 | <p>Further information/explanation provided to complainant. However, limited details provided at the time. As time has evolved, more is being provided.</p> <p>(Copy letter provided to PA).</p> |
| CO/62/20 | CR0082020 | 08/06/20 (Complaint Submission to IOPC). | 28/07/20 | To UPHOLD the review | <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> | None | The explanation provided, is the extent to what we are able to do so. The assessment criteria/threshold is operationally sensitive. |

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| CO/33/20 | CR0092020 | 04/05/20 (Complaint Submission to IOPC). | 13/08/20 | To NOT uphold the review | <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> | None | Response letters have been reviewed, which is ongoing. Where identified continued enhancements are made to letters. |
| CO/69/20 | CR0102020 | November 2019. | 13/08/20 | To NOT uphold the review | <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> <p>Further, it was noted that the response to the complainant should have</p> | None | Noted, as detailed above, response letters have been reviewed, which is ongoing. Where identified continued enhancements are made to letters. |

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| | | | | | explicitly detailed why it was felt it was reasonable and proportionate. | | |
| CO/44/20 | CR0112020 | 13/02/19 (Complaint submission to Action Fraud). | 13/08/20 | To UPHOLD the review | <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> | None | <p>A further response providing information cannot be located. Given that the appeal was in July and no further contact has been made by complainant, it is not thought appropriate to provide information now.</p> <p>We apologise, as clearly, if further information was not sent, this is not acceptable.</p> |
| CO/10820 | CR0132020 | 23/06/20 (Complaint Submission to IOPC). | 13/08/20 | To UPHOLD the review | <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> | 09/09/20 | <p>Further information sent.</p> <p>Copy of e-mail provided to PA).</p> |

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| CO/89/20 | CR0152020 | 19/05/20 (Complaint submission to Force). | 18/09/20 | To UPHOLD the review | <p>The Force should apologise for the misleading response the complainant had received in the first instance about there being a 'single isolated cases' policy.</p> <p>Further, it was noted that the response to the complainant did not address the allegation that their MP's letter on the matter had been ignored.</p> <p>To ensure there is complete clarity; and to ensure expectations of complainants are managed at the very outset, the force should use the terms 'reasonable' and 'proportionate' in their response letters to complainants. This would help complainants to understand that a reasonable and proportionate outcome should be expected across the handling of complaints.</p> <p>Additionally, explanation should be provided to the complainant about the course of action CoLP have taken to ensure incorrect advice is not provided to complainants in future regarding the criteria for investigation. Particularly with reference to single, isolated cases of fraud providing a basis for the non-investigation of a case.</p> | 25/09/20 | <p>Further information sent.</p> <p>Copy of e-mail provided to PA).</p> <p>This is now incorporated within our letters.</p> |
| CO/124/20 | CR0162020 | 08/02/20 (Complaint submission to Action Fraud). | 18/09/20 | To UPHOLD the review | <p>The force should provide the complainant with a more detailed explanation of the NFIB assessment process and explanation as to how they are used to assess cases.</p> | 25/09/20 | <p>Further information sent.</p> <p>(Copy of e-mail provided to PA).</p> |

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| | | | | | Additionally, the Panel noted the importance of clarity of language, i.e. telling the complainant that there were 'no viable lines of enquiry' when details had been supplied. 'Insufficient lines of enquiry' may be a more accurate | | |
| CO/85/20 | CR0172020 | 12/06/20 (Complaint Submission to IOPC). | 18/09/20 | To UPHOLD the review | <p>The force should write to the complainant to explain that the role of the Serious Fraud Office is not the appropriate body to appeal to.</p> <p>The force should apologise to the complainant for the lack of response received from Action Fraud regarding the '5 working day' response time quoted to them by the Director of Action Fraud.</p> <p>The force should note that their response letter to the complainant incorrectly referenced 'suspect bank details'. The force should ensure responses to complaints do not 'cut and paste' specific details. The force should ensure they have a separate document included in their responses to complainants which outlines elements of the case assessment summary.</p> | 25/09/20 | Further information sent. (Copy of e-mail provided to PA). |
| CO/132/20 | CR0182020 | 13/07/20 (Complaint submission to Action Fraud). | 18/09/20 | To UPHOLD the review | <p>The force should apologise to the complainant for the dissatisfaction experienced in the handling of their crime report, by the Action Fraud call handler.</p> <p>In addition, there was some debate by the Panel, noting that <i>identity theft</i> is not explicitly a crime, whether there has been an offence committed in this</p> | 25/09/09 | Further information sent. (Copy of e-mail provided to PA). |

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| | | | | | <p>instance (i.e. misuse of personal data, GDPR). And if so, the force should direct complainants to look at the information Commissioner's website for further advice regarding criminal offences. This approach would help the force to better reflect their public protection duties to complainants.</p> <p>The Panel agreed the force may wish to consider the use of more every-day language that complainants can understand when explaining the steps involved in recording complaints under schedule 3.</p> <p>Additionally, the Panel felt clearer instruction should be provided by the force to complainants outlining how further information can be logged to existing crime reports.</p> <p>The force should note that there is an infographic on the Action Fraud website outlining what happens to Action Fraud reports, which is dated 2014-15. The Panel agreed that this infographic should be updated to detail figures for 2019-20.</p> | | |
| CO/186/20 | CR0192020 | 14/08/20 (Complaint submission to Force). | 18/09/20 | To NOT UPHOLD the review | <p>Despite not upholding the review, the Panel did feel that the response to the complainant could have been better tailored to explain that the fraud reported was legitimate.</p> <p>The force should note that their response letter incorrectly referenced 'no viable lines of enquiry' being available when they had been</p> | None | Response letters have now been updated to include information relating to issue of automated letters referring to "no viable lines of enquiry" |

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| | | | | | provided; and will want to ensure this is addressed in future correspondence to complainants. This could help to reduce complainants feeling of dissatisfaction in the quality of service received; and any concerns complainants may have about issues raised actively being dismissed by the force. | | |
| CO/205/20 | CR0202020 | 27/07/20 (Complaint submission to Force). | 18/09/20 | To UPHOLD the review | The force should write to the complainant with a clearer explanation of what is meant by viable lines of enquiry and outline how they are relevant in the assessment of cases. | 28/09/20 | Further information sent. (Copy of e-mail provided to PA). |
| CO/167/20 | CR0212020 | 02/07/20 (Complaint submission to PSD. Linked to complaint submitted in July 2016). | 21/10/20 | To NOT UPHOLD Review | Despite not upholding the review, the Panel felt further clarification should be provided to the complainant regarding the complaints process. The Panel agreed that the Police Authority should write to the complainant and outline that an appropriate response was provided. The Police Authority should also make clear to the complainant that the current reviews process can only look at the response the complainant received from the force; and cannot be used to overturn non-investigation policing decisions by Action Fraud/NFIB. | None | The PA wrote to Mr Brialey to inform him of his review outcome. No further action required from the force |

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| CO/111/20 | CR0222020 | 03/07/20 (Complaint initially submitted to Met Police). | 21/10/20 | To NOT UPHOLD the review | Despite not upholding the review, the Panel agreed that the force could consider its Body Worn Video SOP, when the SOP is next up for review – with a view to considering if there should be a clearer steer on when it is used, especially in relation to exercising warrant searches. Additionally, The Panel agreed that the force could consider the terminology used when explaining what aspects of a complaint have been assessed for 'reasonable and proportionate response'. The Panel felt it would be more appropriate for the force to utilise the phrase 'this is believed to be a reasonable and proportionate response' in outcome letters. | None | Recommendations for the SOP will be added to the learning tab so that they can be picked up at PSDWG and considered for action by the appropriate Directorate. |
| Page 33 CO/123/20 | CR0232020 | 10/02/20 (Complaint submission to Action Fraud). | 14/12/20 | To UPHOLD the review | The Force should provide the complainant with a further explanation of the assessment criteria applied to cases. Additionally, given the complainant made specific reference to aspects of the communication received from Action Fraud being 'cut and paste'. It was noted that the response to the complainant on 09/03/20 was signed 'Head of Action Fraud'. The Panel agreed that communication sent by the Action Fraud Department should also include the 'senders' name. | 22/12/20 | Further information sent. The Senior Leadership Team made the decision to take Pauline's Smith's name off of correspondence, due to the large amount of correspondence that was being sent. Also Pauline's social media accounts were sent messages. A team is in place to answer questions or deal with complaint, addressed to Head of Action Fraud. |
| CO/00282/20 | CR0252020 | 04/10/20 (Complaint submission to Force). | 14/12/20 | TO UPHOLD Point ii. | To ensure there is complete clarity, the force should provide the complainant with a clearer explanation of what is meant by viable lines of enquiry and outlines how they are relevant in the assessment of cases. The Panel felt | 23/12/20 | Further Information provided. |

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| | | | | | clearer explanation could be provided to the complainant in this respect. | | |
| CO/00295/ 20 | CR0262020 | 11/04/20 (Complaint submission to Action Fraud). | 16/11/20 | TO UPHOLD point i) and ii). | <p>The Force should ensure there is an appropriate process in place to pick up and identify complaints addressed to the 'Head of Action Fraud' and allocate complaints to individuals within the department who can respond. The Panel felt this would help to ensure no correspondence is missed and reduce complainants feeling of dissatisfaction in the quality of service received.</p> <p>The Panel also felt the force may wish to consider the use of more every-day language that complainants can understand. Particularly when explaining how intelligence is used to 'disrupt offenders'; and how 'safeguarding' practices work when individuals are threatened.</p> <p>In addition, the Panel felt clearer instruction should be provided to complainants outlining how further information can be logged to existing crime reports. This approach would help to ensure greater clarity and direction is provided to complainants across the reporting process. The Panel felt this could help to reduce feelings of 'missed opportunities' by complainants, in respect to making further representations about their case.</p> <p>It was noted by the Panel that the initial response provided to the complainant did not outline the 28-day</p> | None | <p>An operational decision was made by the Senior Leadership Team, to remove Pauline Smith's name from automated letters, as she was receiving a vast amount of e-mails, and also on her personal social media accounts.</p> <p>There are processes in place to ensure that such letters are passed to an NFIB Information HUB to answer, or complaints forward to PSD. Anything that is addressed to Action Fraud is either forwarded to NFIB's Information HUB if a question is asked, or straight to PSD if a complaint. There is a small team at the NIFB Hub consisting of two individuals that sift through any questions asked and respond.</p> <p>The initial letter did not contain the appeal process information, as in line with legislation was dealt with outside of what is known as Schedule 3, whereby it is believed that the complaint could be dealt with more informally. This approach was initially taken, and when it became apparent that the complainant was dissatisfied, in line with legislation, a further assessment was undertaken, and appeal rights granted.</p> |

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| | | | | <p>notification period in place to appeal the outcome of the resolution to the complainant.</p> <p>The Panel were pleased to hear that the police conducted a welfare check. They felt this was appropriate given the abuse highlighted by the complainant.</p> | | <p>Continued work is being undertaken to enhance the responses sent to complainants.</p> |
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Agenda Item 7

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| Committee(s) | Dated: February 2021 |
| Committee name Committee name | Professional Standards and Integrity (Police) Committee |
| Subject: Update Re: Action Fraud and National Fraud Intelligence Bureau complaints. | Public |
| Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly? | N/A |
| Does this proposal require extra revenue and/or capital spending? | N |
| If so, how much? | N/A |
| What is the source of Funding? | |
| Has this Funding Source been agreed with the Chamberlain's Department? | N/A |
| Report of: DI Craig Mullish | For Update Re: Action Fraud and NFIB Complaints. |
| Report author: Det Inspector Craig Mullish | |

Background

Complaints relating to Action Fraud (AF) and National Fraud Intelligence Bureau (NFIB) have historically been managed between different departments.

As of the 3rd August 2020, The Professional Standards Directorate (PSD) has taken responsibility for managing the complaints, to ensure that the regulatory requirements, set by the Independent Office for Police Conduct (IOPC) are adhered to.

PSD's Action Fraud Complaints Team consists of:

1 X Detective Inspector

1 X Grade D

This report is intended to provide an overview of complaints received, and a progress update on the initiatives that have been put in place and being reviewed to improve service delivery.

Main Report

Complaints Re: AF and NFIB

At this time, PSD receive in the region of 55 complaints per month.

In addition, approximately 5 enquiries are received per month from Members of Parliament (MP's), and a further 5 from the Home Office, Fraud Policy Unit, primarily requesting updates for constituents on their complaints.

Themes of complaints received

An analysis of complaints and dissatisfaction reports received over the previous 9 months, has been undertaken, detailed below. The highlighted ones are the top 3, most commonly received.

- **AF has not investigated a report made**
- **NFIB has not investigated a report made**
- **Complainant advised that there are no viable lines of enquiry to investigate their report, when viable lines of enquiries have been provided**
- No update was provided, following report made to AF
- Report disseminated by NFIB has not been investigated by the relevant force
- A report made direct to a local force has not been investigated
- A reported crime is recorded as an Information Report

Within any given complaint, often several of the above are quoted. Circa 95% of complaints are made up of the 3 highlighted areas above, with the remaining 5% across the all others.

Demographics of complainants

There are no common themes of complainants identified, and received from a range of ages, genders, cultural backgrounds, and geographical locations throughout the UK.

Action taken to address above, and reduce complaints

- A Working Group has been set up between AF, NFIB and PSD to review suggestions for improving service.
- To seek an early resolution, where appropriate, and in line with IOPC guidance, PSD correspond at an early stage with complainants, usually by telephone, providing advice and discuss areas of appropriate recourse. Advice on how best to protect themselves on being a further victim of crime is also provided.
- Information has been provided to MP's on the role and function of AF and NFIB, to allow them to respond directly to their constituents. Explaining the process allows MP's to give a lay person an explanation of the processes to their constituents.
- FAQ's updated on AF website.
- Automated letters, following a report made to AF are sent within 28 days, from NFIB, providing generic reasons as to why a report has not been investigated. NFIB have reviewed these, and made relevant amendments, that provide a better explanation of their processes. However, these have not been uploaded as yet, as require sign off, give that there is a cost implication in doing so, therefore understandably, changes are kept to a minimum.

- PSD provide further information to complainants, regarding the NFIB's assessment case criteria, confirming the use of algorithms, collective losses, vulnerability, and how fast a crime is growing.

In addition, further information is provided with regards to what are considered to be viable lines of enquiry, which includes, e-mail addresses, phone numbers, suspect names, and bank account details.

Both of these areas are key elements of complainant's dissatisfaction

Ongoing engagement with NFIB and Police Authority Team (PAT) to scope viability of providing additional information to complainants

PSD continue to engage with NFIB to further discuss and review what additional information that can be included within PSD response letters. PSD are also working with the PAT, to enhance the correspondence sent to complainants, to ensure that as best we can, members of the public have access to a simple, clear overview of the process by which cases are assessed by NFIB.

Conclusion

Significant progress has been made in relation to identifying areas of dissatisfaction, and understanding what is required to address them, with a view of enhancing the service for victims.

A key area of frustration was the lack of information provided to complainants regarding NFIB's case acceptance criteria, and what are considered to be viable lines of enquiry. Both these areas have been addressed.

AF, NFIB, PSD and PAT continue to work together to identify and implement the relevant changes, where possible to do so.

Detective Inspector Craig Mullish

Appendices

Appendix 1: FAQ's on AF'-Link to website: <https://www.actionfraud.police.uk/faq>

Appendices

Appendix 1: FAQ's on AF's website

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|-------------------------------------------------------------------------------|--------------------------------------------------|
| Committee(s): Police Professional Standards and Integrity Committee | Date(s): 20 th January 2021 |
| Subject: Officers on Temporary and Acting Promotion | Public |
| Report of: Commissioner of Police | For Information |
| Report author: CoLP HR Directorate | |

Summary

The Committee received a Report of the Commissioner of the City of London Police concerning Officers on Acting and Temporary Promotion at the meeting in November 2020.

The Assistant Commissioner explained that the number of Officers on acting and temporary promotion was significantly higher than the historic norm due to the Force waiting for the shape of the Transform Model to be concluded in early 2021. Currently, when vacancies have arisen, the Force have turned to internal recruits as this is the best way to ensure it was in good shape to roll out the new model quickly and effectively in 2021; the Assistant Commissioner anticipated that, once the model was in place, the numbers in the Report would decline, as the Force reverted to normal methods of application and recruitment.

This report details where the force still has officers Acting and Temporary ranks and the promotion processes taking place over the next few months to reduce this number.

Recommendation

It is recommended that Members note the report.

Current Position

The table below details the number of officers we have Temporarily promoted and Acting at each rank within each Directorate.

| | BSD | Crime | ECD | I&I | UPD | Total |
|----------------|------------|--------------|------------|----------------|------------|--------------|
| Sgt | | | 6 | | 4 | 10 |
| Insp | 1 | | 2 | 2 | 2 | 5 |
| Ch Insp | | 1 | 4 | 2 | | 7 |
| Supt | | 2 | | 1* | | 3 |
| Ch Supt | | 1 | | | | 1 |
| Cmdr | 2 | | | | | 2 |
| Total | 3 | 4 | 12 | | | 30 |

* Please note this officer is working with the NPCC on their Equality and Inclusion strategy. This secondment was advertised as a Temporary Promotion process by the NPCC however funded by the officer's Home Force.

There are currently 30 officers temporary promoted to a rank higher than their substantive rank. As at the end of December 2020.

The recent Sergeants promotion process concluded in November 2020 and yielded 32 successful candidates. These officers will be posted to those roles that have been identified as remaining in the new Target Operating Model (TOM) following the Transform programme. Some of those successful officers will be placed on a select list and posted to Sergeant vacancies as they arise.

This will reduce the number of officers temporarily promoted at this rank, UPD (Local Policing as per the new TOM), positions have been finalised as the first Directorate to go-live with their TOM and therefore officers will be posted accordingly.

Following the Inspector Exam that took place in the Autumn and the results that were released in December 2020, a promotion process for this rank will launch in January 2021 which will reduce the number of officers temporarily promoted at this rank.

For the ranks of Chief Inspector and Superintendent the force are not looking to launch a promotion process until the final TOM is agreed as many of the officers temporary in these ranks are undertaking the roles due to officers that have recently left the force and/or working on a full time project where they are unable to meet the demands of both of the roles.

The Force recently completed a Chief Superintendents process, and the role in Crime will not exist once the new TOM is in place. As this merges with other areas of the force.

It must also be noted that all Temporary Promotion requests are submitted to Strategic Workforce Planning to ensure that the requirement is justified and it cannot be managed in a different way. Temporary promotions are filled with internal officers via a selection process.

Future State

As detailed above there are promotion processes in place for the ranks of sergeant and inspector. With consideration being given to the requirement of promotion activity once the new TOM is finalised. Therefore reducing those officers that are temporarily promoted.

Agenda Item 9

| | |
|-------------------------------------------------------------------------------------|--------------------------------------------------|
| Committee(s): Police Professional Standards and Integrity Committee | Date(s): 5 th February 2021 |
| Subject: Covid-19 Fixed Penalty Notices (FPNs) and Stop and Search update | Public |
| Report of: Commissioner of Police Pol 14-21 | For Information |
| Report author: James Morgan, Superintendent Operations, Uniform Policing | |

Summary

At your May 2020 Police Authority Board as part of the new governance and scrutiny arrangements, the Force was directed to submit regular quarterly reports to the Professional Standards and Integrity (PSI) Committee on Stop and Search. The first of these reports, detailing Q1 data was submitted to your September 2020 PSI Committee and the second detailing Q2 data was submitted to your November 2020 PSI Committee.

The Force has not been able to submit a full report on Q3 data to this Committee owing to a timing issue, as at the time of submission, the data for Q3 is still being collated and analysed and the Force Stop and Search Working Group meets to consider this data on the 3rd February 2021. However, a summary infographic is presented in the main report with indicative data, and a link to the full Q3 data and analysis report on the City of London Police Website will be circulated to Members as soon as it is published.

At both previous PSI meetings a number of observations in regard to the stop and search data and presentation of data were raised. These are detailed in the main report with responses shown. Where shown some are being considered in Force by the Stop and Search Working Group in terms of whether there is a cost and if it would be an efficient use of resources.

Also presented here is the data on Covid-19 Fixed Penalty Notices (FPNs) issued FYTD, which is an area of interest for Members, this includes numbers issued, where issued (CoLP/MPS), ethnicity, gender and offences (Appendix 1).

Recommendation

Members are asked to note the report

Main Report

Background

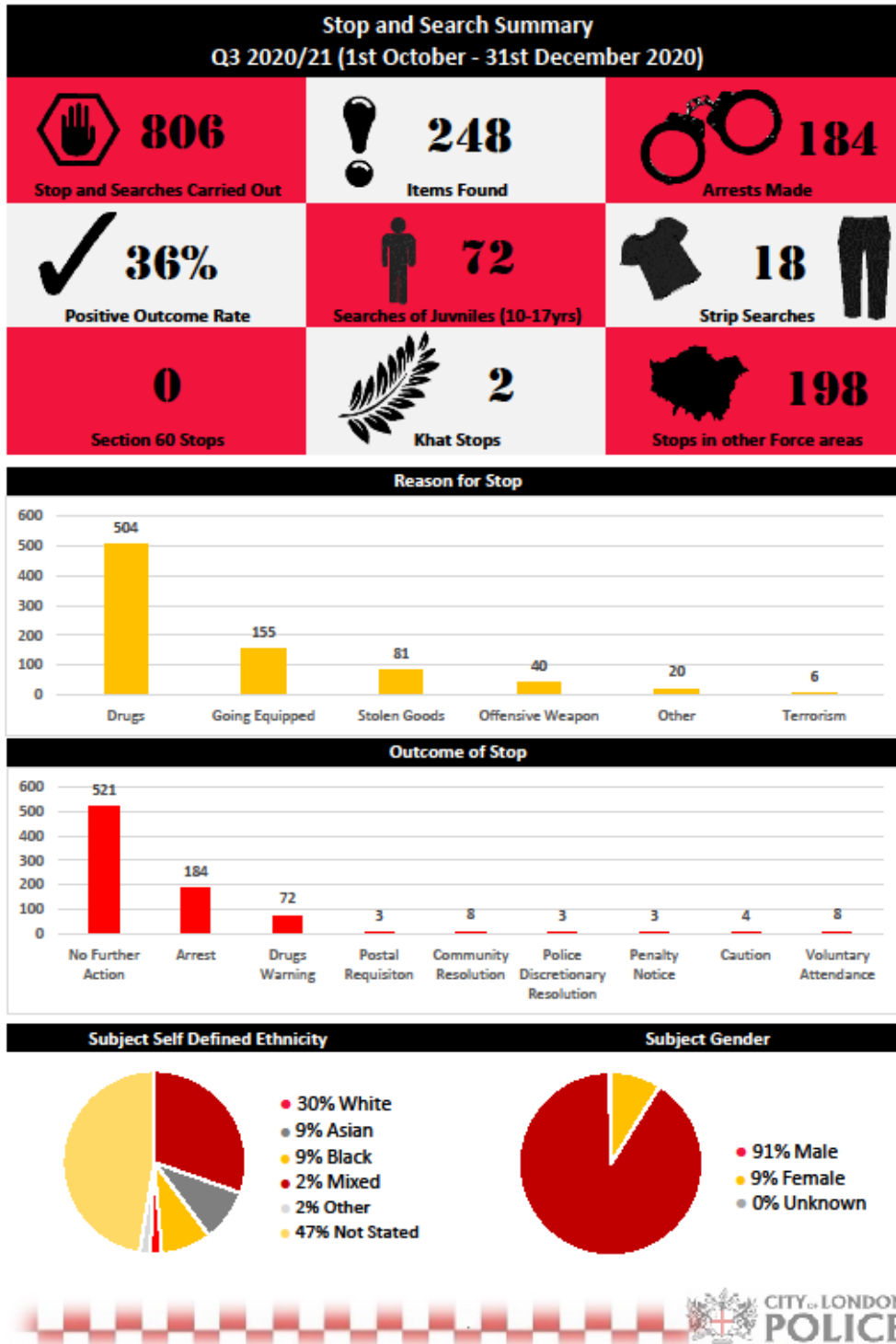
1. The Force previously used to report annually on Stop and Search into the Police Authority Board (PAB). At your May 2020 PAB as part of the new governance and scrutiny arrangements, the Force was directed to submit regular quarterly reports to the Professional Standards and Integrity (PSI) Committee on Stop and Search. It was agreed with the Chairman of this Committee and the Police Authority Team, that the Force would submit the Quarterly Stop and Search reports that it publishes on the CoLP website. This was completed for Q1 and Q2.

Current Position

2. Owing to a timing issue, there is no full Q3 report and analysis, as at the time of submission, the data for Q3 is still being collated and analysed and the Force Stop and Search Working Group meets to consider this data on the 3rd February 2021. However, a summary infographic is presented below and a link to the Q3 data from the Force website will be circulated to Members as soon as the full report is published.
3. Additionally, the Force is able to present to Members data on the issue of Covid-19 FPNs, attached at Appendix 1. This shows numbers issued, where issued, offence, ethnicity, gender, whether City resident. A verbal account in support of this data will be provided at the meeting.

Q3 Stop and Search data Summary infographic¹

CITY OF LONDON POLICE: SUITABLE FOR PUBLICATION



CITY OF LONDON POLICE: SUITABLE FOR PUBLICATION

¹ These figures are preliminary and need to be reconciled before the figures are finalised for the full report that will be published, but are indicative.

Observations on Stop and Search data previously presented

4. Comments on the presentation of data made at the September meeting by an observer when the Q1 data was presented and by Members at the November meeting when the Q2 data was presented are shown below with Force responses:

| Comment: | Response: |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Q1 | |
| <p>There appeared to be differing approaches to statistics within the quarterly report varying between self-identified ethnicity and perceived ethnicity, which could give rise to misleading statistics.</p> | <p>This is a reporting requirement. The officer is required to record their perception of ethnicity on each stop search form and to ask the subject of the stop to self define their ethnicity but they are not required to answer. The Force is required to report both sets of ethnicity data in to the Home Office and used as the basis for different measures, which is why the Force presents the information in this format.</p> |
| <p>There was also a differing approach to using either graphic presentation of data versus narrative descriptions where a direct comparison of like with like would perhaps be more helpful.</p> | <p>Noted. The Force will look to provide like for like comparisons where possible. Often the narrative is the analysis which describes what the graphic presentation means however.</p> |
| <p>It would be helpful if data could be presented in a more qualitative way e.g. breaking drug stops down into whether the arrest was for Class A, Class B, and either supply or possession</p> | <p>We cannot give a breakdown based on possession/supply or Class of drug as this information simply is not available on the form which is set nationally. It would require a time consuming manual trawl of data on both the stop search forms and other linked occurrences for the individual. The only breakdown we can provide in terms of drugs is Cannabis/Khat/Other as those are the categories available in the reason section of the search form set nationally. We can however make the breakdown of drug type by ethnicity clearer in the report.</p> |
| <p>Observer queried how many of the 106 drug stops conducted (Q1) were done for the reason that cannabis could be smelled, which was bad practice.</p> | <p>This would require a manual trawl of the grounds on the form and so has not been undertaken as no capacity to do this level of trawl. The Force has delivered training on the Best Use of Stop and Search (BUSS) scheme: under BUSS, the smell of cannabis alone should not form the basis for a search, however as noted below it could be lawful grounds for a search. All Stop Search forms (including grounds) are reviewed by the officer's supervisor, and this should be done within 24hrs. Additionally, records are dip sampled regularly so any would be highlighted and any issue identified through the supervision process. Additionally, although the College of Policing advises officers against carrying out a stop and search, based solely on the smell of cannabis and a recent report by HM Inspectorate of Constabulary (HMICFRS) found that the smell of cannabis</p> |

| | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>should not be grounds to stop a suspect in and of itself. This is only guidance for officers and not law. Reasonable grounds for suspicion must relate to the likelihood that the object in question will be found. There is no stated case which says that the smell of cannabis alone cannot provide reasonable grounds. However, based on the HMIC report, searching Officers should consider and record all of the information available to them, including their own observations of suspicious behaviour, not just the smell of what they believe to be cannabis. As stated all grounds have to be reviewed and approved (after the search) by a supervisor and are dip sampled regularly.</p> |
| Q2 | |
| <p>A Member queried the outcome rates on page 30. In response, officers, whilst pointing out that CoLP was the best performing Force in the UK in terms of positive and judicial outcomes post arrest (28%), cautioned Members that the data within the Report needed to be set in context; once an arrest was made, it could result in a range of eventualities, which did not, in and of itself, negate the overall effectiveness and efficacy of Stop and Search as a tactic in the City. Indeed, Her Majesty's Inspectorate of Constabulary's (HMIC) recent review found that 92% of the grounds for a Stop and Search by City of London Police were reasonable – this was the highest rate across all UK Forces. Whilst the picture was nuanced, the Assistant Commissioner confirmed that he would look to provide clearer explanation on the data in future.</p> | <p>The Force is unclear what further information, if any, is required in this regard, the minutes do not detail the query, if this could be explained further we can look into if it is possible.</p> <p>Again though, if Members are looking for the outcome after arrest, this requires a manual trawl of data on both the stop search forms and other linked occurrences for the individual, this can be very time consuming and a previous trial of this found that in a significant number of stops when someone is arrested they are taken to a MPS custody suite not Bishopsgate, in which case we do not know the outcome of the arrest thereby potentially skewing the available data.</p> |
| <p>Concerning Stop and Search based on ethnicity could be presented in percentage terms going forward</p> | <p>It is already presented in % terms in the report.</p> |

5. With reference to the requests that would require a manual trawl, the Stop and Search Working Group will:
 - a) consider whether the Force has the capacity to do this and if this would be an efficient use of current resources and
 - b) assess where a change to systems/processes/forms could lead to enhanced data presentation, what the cost will be and whether the change is possible and also cost effective.

6. These will be considered prior to the start of the new financial year and depending on the assessment of the Stop and Search Working Group, any changes will be made to the reports going forward for 2021-22. It would be desirable for no further changes to data presentation to be made in year if possible.

Conclusion

7. Stop and Search is an important tactic for the Police Service and the Force recognises the importance of effective oversight and scrutiny in this area. All Force Stop and Search data is now published on the Force Website² which provides transparency to the public that we serve.

Appendices

Appendix 1- Covid-19 Fixed Penalty Notices (FPNs) 1st April 2020-18th January 2021

James Morgan

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² <https://www.cityoflondon.police.uk/police-forces/city-of-london-police/areas/city-of-london/stats-and-data/stats-and-data/>

Wave 1 9th April-20th September

Summary

| | CoLP | MPS | Total |
|---------------|------------|-----------|------------|
| Issue Fine | 27 | 52 | 79 |
| Use of Powers | 74 | 8 | 82 |
| Total | 101 | 60 | 161 |

Demographics

| Self Defined Ethnicity | Fines Issued | Use of Powers |
|--------------------------------|--------------|---------------|
| A1. Asian - Indian | 3 | 2 |
| A2. Asian - Pakistani | 1 | 0 |
| A3. Asian - Bangladeshi | 9 | 1 |
| A9. Any other Asian background | 2 | 2 |
| B1. Black Caribbean | 2 | 3 |
| B2. Black African | 11 | 7 |
| B9. Any other Black background | 2 | 2 |
| M1. White & Black Caribbean | 2 | 2 |
| M2. White & Black African | 2 | 0 |
| M3. White & Asian | 1 | 0 |
| M9. Any other mixed background | 2 | 2 |
| NS. Not stated | 14 | 26 |
| O9. Any other ethnic group | 2 | 2 |
| W1. White British | 18 | 15 |
| W9. Any other white background | 8 | 18 |

| Officer Defined Ethnicity | Fines Issued | Use of Powers |
|------------------------------|--------------|---------------|
| 0. Unknown | 4 | 1 |
| 1. White - North European | 21 | 30 |
| 2. White - South European | 9 | 15 |
| 3. Black | 27 | 21 |
| 4. Asian | 18 | 13 |
| 5. Chinese,Japanese,SE Asian | 0 | 0 |
| 6. Middle Eastern | 0 | 2 |

| Gender | Fines Issued | Use of Powers |
|---------|--------------|---------------|
| Male | 73 | 63 |
| Female | 6 | 19 |
| Unknown | 0 | 0 |

| City Resident | Fines Issued | Use of Powers |
|---------------|--------------|---------------|
| Yes | 0 | 0 |
| No | 79 | 82 |
| Unknown | 0 | 0 |

Offences

| Fine Offence | Fines Issued |
|-------------------------------------------------------------------------------------------------------------------|---------------------|
| Contravene a direction or fail to comply with instruction - Coronavirus | 3 |
| Contravene requirement as to restriction of movement during emergency period - Coronavirus | 60 |
| Contravene requirement to not participate in a gathering in public of more than two people - Coronavirus | 7 |
| Participate in gathering in public of more than two people in England during coronavirus emergency period | 2 |
| Participate in gathering of more than 30 people on land in public outdoor place during emergency period - England | 7 |

Wave 2 21st September- Present

Summary

| | CoLP | MPS | Total |
|---------------|------------|----------|------------|
| Issue Fine | 29 | 4 | 33 |
| Use of Powers | 107 | 4 | 111 |
| Total | 136 | 8 | 144 |

Demographics

| Self Defined Ethnicity | Fines Issued | Use of Powers |
|--------------------------------|--------------|---------------|
| A1. Asian - Indian | 0 | 0 |
| A2. Asian - Pakistani | 1 | 2 |
| A3. Asian - Bangladeshi | 2 | 1 |
| A9. Any other Asian background | 2 | 2 |
| B1. Black Caribbean | 0 | 3 |
| B2. Black African | 2 | 2 |
| B9. Any other Black background | 1 | 0 |
| M1. White & Black Caribbean | 0 | 0 |
| M2. White & Black African | 0 | 0 |
| M3. White & Asian | 0 | 0 |
| M9. Any other mixed background | 2 | 2 |
| NS. Not stated | 8 | 79 |
| O9. Any other ethnic group | 1 | 2 |
| W1. White British | 12 | 14 |
| W9. Any other white background | 2 | 4 |

| Officer Defined Ethnicity | Fines Issued | Use of Powers |
|------------------------------|--------------|---------------|
| 0. Unknown | 7 | 10 |
| 1. White - North European | 15 | 55 |
| 2. White - South European | 4 | 6 |
| 3. Black | 2 | 21 |
| 4. Asian | 5 | 14 |
| 5. Chinese,Japanese,SE Asian | 0 | 2 |
| 6. Middle Eastern | 0 | 2 |

| Gender | Fines Issued | Use of Powers |
|---------|--------------|---------------|
| Male | 31 | 91 |
| Female | 2 | 17 |
| Unknown | 0 | 3 |

| City Resident | Fines Issued | Use of Powers |
|---------------|--------------|---------------|
| Yes | 4 | 15 |
| No | 28 | 73 |
| Unknown | 1 | 23 |

Offences

| Fine Offence | Fines Issued |
|--------------------------------------------------------------------------------------------------------------|--------------|
| Contravene requirement imposed / direction given by relevant person - coronavirus | 2 |
| Face Coverings - Enter / remain in relevant place in England without wearing a face covering | 1 |
| Fail to cease carrying on business / service not permitted to be open in Tier 4 area - (£1k) | 1 |
| Fail to comply with reasonable instruction given by relevant person in England - coronavirus | 1 |
| Hold / involved in holding indoor rave type gathering of more than 30 people in Tier 2 area-£10K | 1 |
| Leave / were outside of place where living in England, without reasonable excuse - coronavirus | 2 |
| Participate in gathering in outdoor place of more than two people in England - coronavirus | 2 |
| Participate in gathering in public outdoor place of more than two people in England - coronavirus | 1 |
| Participate in gathering of more than six people in public outdoor place in Tier 3 area | 1 |
| Participate in gathering of more than two people in public outdoor place in Tier 4 area | 9 |
| Participate in gathering of two or more people in other outdoor place in Tier 4 area | 2 |
| Participate in indoor gathering in England - coronavirus (2 or more people) | 3 |
| Person living in Tier 4 area participate in indoor gathering of two or more people outside the area | 1 |
| Person living in Tier 4 area, leave / were outside of place where living, without reasonable excuse | 3 |
| Self Isolation - Following positive coronavirus test fail to comply with self isolation requirements | 1 |
| TIER 2 Gathering- Hold / involved in holding a of more than 30 people in private dwelling in the Tier 2 £10k | 1 |
| TIER 2 Restriction - Contravene requirement to close premises and business for a specified time £1000 | 1 |

| | |
|-------------------------------------------------------------------------------|----------------------------------|
| Committee: Professional Standards and Integrity Sub (Police) Committee | Dated: 05.02.21 |
| Subject: Avenues of Appeal | Public |
| Report of: Assistant Commissioner | For Information |
| Report author: Ian Younger | |

Action 8/2020/P

Routes of Appeal.

Police Complaints Appeal Process

All complaints recorded under Schedule 3 have a right of review/appeal. Under the Police (Complaints and Misconduct) Regulations 2019 this would either be a review by the Local Policing Body – the Common Council, for City of London Police, or an appeal to the IOPC. The relevant review/appeal body is determined by the Appropriate Authority on the initial assessment and recording of the complaint. This is considered on seriousness of the allegation(s) made based on guidance set out in IOPC Statutory Guidance. Once a review or appeal is complete there is no further course of review or appeal other than an application for Judicial Review on the basis that the regulations and the Police Reform Act 2002 have not been properly applied.

Alternative Signposting Fraud

There are a number of alternatives to police complaints which the NFIB often signpost. These include, but not limited to, banks, under banking regulations; the Banking Ombudsman; the Financial Conduct Authority; the Financial Ombudsman; the Insolvency Service and professional legal advice so victims can consider their options for litigation and/or civil recovery, or even, private criminal prosecution. The appropriate body, agency or organisation will depend on the circumstances of the alleged fraud. If a victim cannot afford professional legal advice they are signposted to the Citizen Advice Bureau.

Aan extensive list of Useful Organisations is available on the Action Fraud website . For the most vulnerable there is additional assistance through the Economic Crime Victims Support Unit which is part of Action Fraud and which liaises with local Victims Support units. ECVCU can also signpost victims to organisations, charities and advocacy services to assist them. Action Fraud cannot offer any legal or more specific advice to assist victims in the recovery of any losses.

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| | |
|-------------------------------------------------------------------------------|-----------------------------------------------|
| Committee(s): Professional Standards and Integrity Committee | Date: 5 th February 2021 |
| Subject: Integrity and Code of Ethics Update | Public |
| Report of: Assistant Commissioner | For Information |
| Report author: Head of Strategic Development, City of London Police | |

Summary

This report usually provides Members with an update of the Force's Integrity Standards Board (ISB) together with the dashboard considered at that meeting, regional and national developments following those meetings, and an update on the Integrity Standards Development plan. The report for this quarter is shorter than would normally be the case as the ISB has not yet taken place, and there have not been any regional or national meetings since your last Committee.

Integrity Standards Board:

The Force's Integrity Standards Board last met on 18th November 2020. A draft dashboard (which did not change) was submitted to your Committee for information. The next ISB is scheduled to take place on 9th February, four days after your Committee. It is not therefore possible to provide Members with a dashboard for this Committee, however, it can be circulated to Members for information following the ISB.

Code of Ethics Update:

Under Transform, it is proposed to transfer responsibility for leading on the Code of Ethics to PSD, which is in line with most other forces and reflects a similar change that has recently taken place in the MPS. In the City of London Police, as PSD will sit within HQ Services, the area will still report into the Assistant Commissioner.

A further impact of the move within the MPS is that the future of the London Police Challenge Forum (LPCF) is now in doubt. The continuing absence of any LPCF events has resulted in CoLP setting up its own internal event, scheduled for 18th February 2021. A link to the event will be sent to Members should any wish to observe or take part in the panel.

No national meeting of the UK Police Ethics Guidance Group has taken place since your last Committee.

A regional meeting was scheduled to take place on 14th January 2021, however this was cancelled and is still to be rescheduled.

The Integrity Standards Development Plan is appended to the report for Members' information, there are no outstanding RED areas.

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 Force's Integrity Standards Board last met on 18th November 2020. A draft dashboard (which did not change) was submitted to your Committee for information. The next ISB is scheduled to take place on 9th February, four days after your Committee. It is not therefore possible to provide Members with a dashboard for this Committee, however, it can be circulated to Members for information following the ISB. Where ISBs take place immediately before your Committee it is usual to provide a verbal update at the meeting; as the ISB is post your Committee, that is not possible on this occasion.

Code of Ethics Update

3. The last reported situation regarding the London Police Challenge Forums (LPCF) remains the same, with none having been held since December 2019. To mitigate the continuing absence of these events, the Head of Strategic Development has set up a City of London Police (CoLP) specific event on the 18th February 2021. The event will use MS Teams and will coincide with a refresh of information on the Force intranet and a drive to recruit additional 'ethics associates', which is an action in the Integrity Development Plan. A link to the meeting will be circulated so that any Member who wishes to observe or take part in the event can do so.
4. The Metropolitan Police Service (MPS) has transferred responsibility for leading on ethics to their Professional Standards Directorate (PSD). CoLP is likely to do the same as part of the Transform Programme (and in line with the most forces nationally). This supports the continuing move to 're-brand' PSDs into units that support professionalism and good behaviour and not just departments that are responsible for investigations and discipline that they have been historically.

5. The LPCF Coordinator is in discussion with the MPS PSD regarding the continuation of the London panels. It is not clear at the moment if they will continue in their current format or at all. Consequently, the British Transport Police (BTP) are taking similar action to CoLP and setting up their own internal panel.
6. This development has also impacted one of the actions in the Integrity Development Plan, which is for the Head of Strategic Development to work with the LPCF coordinator to revise the Terms of Reference for the LPCF. This was done; however, the revision had not been consulted on with the other members of the LPCF. Given the current uncertain status of the LPCF, the revised ToR is effectively out of date. Depending on the action taken by the MPS regarding the future resourcing of the LPCF, a decision will be made whether they are still required.

UK Police Ethics Guidance Group and Regional Police Ethics Network.

7. No national meeting of the UK Police Ethics Guidance Group has taken place since your last Committee.
8. A regional meeting was scheduled to take place on 14th January 2021, however that was cancelled and is still to be rescheduled.

Integrity Standards Development Plan

9. The Integrity Standards Development Plan is appended to this report for Members' information.
10. Members are asked to note that the action relating to the LPCF ToR has been CLOSED pending any decision on the future of that group (see para. 6).
11. The previous RED (no 2.4) has now been remedied. The relevant software has now been procured and will be installed during February 2021.

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POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2020-21 January 2021 update



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 | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|--------|--------|--------|
| | Jun 20 | Sep 20 | Nov 20 | Jan 21 |
| 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 | AMBER | GREEN | GREEN | GREEN |
| 1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas | GREEN | GREEN | GREEN | GREEN |
| 1.5 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes | GREEN | GREEN | GREEN | GREEN |
| 1.6 Maintain a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates) | GREEN | GREEN | GREEN | GREEN |
| 1.7 Maintain a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan | GREEN | GREEN | GREEN | GREEN |
| 1.8 Ensure training on standards, values and leadership ethics is available for all staff | GREEN | GREEN | GREEN | GREEN |
| 1.9 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures | GREEN | GREEN | GREEN | GREEN |

| 2. Development Measures | Traffic Light Tracker | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|--------|--------|
| | Sep 20 | Nov 20 | Jan 21 |
| NEW MEASURES FROM SEPTEMBER 2020 | | | |
| 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 | AMBER | GREEN |
| 2.2 Work with the MPS Coordinator to revise the LPCF Terms of Reference | NEW | AMBER | CLOSED |
| 2.3 Conduct an annual review of the Force integrity programme and implement identified improvements | NEW | WHITE | WHITE |
| 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 | RED | GREEN |

PERFORMANCE REPORT

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

| Target Report Checklist |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • 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. |

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) | Jun 20 | Sep 20 | Nov 20 | Jan 21 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------|--------|--------|
| 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. There was no meeting during June/July, due to Covid restrictions. Next meeting 9th Feb | AMBER | GREEN | GREEN | GREEN |
| 1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas | In existence and attend Integrity Standards Boards | GREEN | GREEN | GREEN | GREEN |
| 1.5 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes | In existence, last outcomes published 12 th December 2019 (none since that date – checked 20th Jan 2021) | 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 |

| 1. Development Measures | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| MEASURE | 2.1 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 |
| OWNER | Head of Strategic Development / Corporate Communication |
| AIM/RATIONALE | 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. |
| MEASUREMENT | Head of Strategic Development to provide ISB with details of activities supporting this indicator |
| DUE BY | December 2020 |
| TRAFFIC LIGHT CRITERIA | Green: Articles published Amber: Activity in train (within due time) but not delivered. Red: No activity and past due datearticipation |
| TRAFFIC LIGHT | GREEN |
| CURRENT POSITION | |
| <p>January 2021 update: A meeting with Corporate Communications (CC) took place on 16th December 2020 where it was agreed that CC would publish 1 or 2 articles to re-promote the work of the London Police Challenge Forum internally, and to attract additional ethics associates. Publication of the content will coincide with the run up of the internal event which is scheduled for 18th February 2021.</p> <p>It was further agreed that any outcome from the event would be published internally.</p> | |

| 1. Development Measures | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| MEASURE | 2.2 Work with the MPS Coordinator to revise the London Police Challenge Forum (LPCF) Terms of Reference |
| OWNER | Head of Strategic Development |
| AIM/RATIONALE | 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. |
| MEASUREMENT | Revised Terms of Reference agreed by constituent organisations of the LPCF. |
| DUE BY | December 2020 |
| TRAFFIC LIGHT CRITERIA | Green: TORs produced and agreed by due date; AMBER: work in train within the due date; RED: TORs not produced by due date |
| TRAFFIC LIGHT | CLOSED |
| CURRENT POSITION | |
| <p>Head of Strategic Development has met with the MPS coordinator twice to discuss this issue and make changes to the partnerships terms of reference. Whilst changes have been made, they have not yet been consulted on with the other partnership forces (BTP & National Police Counter Terrorism) and remain therefore unagreed. To meet the December deadline, attempts will be made to agree the ToR ahead of the next formal meeting, the date for which is still to be set.</p> <p>January 2021 update: The future of the LPCF is currently in some doubt. During 2020, when no meetings were being held, within the MPS responsibility for leading on integrity/ethics transferred to their Professional Standards Directorate (towards the end of the year). It is currently unclear if the LPCF central coordinator post will continue in that role as part of the MPS PSD, or whether the MPS intends to hold its own internal panels but no longer participate in a London regional group – these matters are still being discussed. As a result of this, the LPCF co-ordinator did not consult on the revised terms of reference. Pending a decision from the MPS in terms of whether they intend to proceed with the LPCF in any form, this action is closed.</p> | |

| 2 Development Measures | |
|------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| MEASURE | 2.3 Conduct an annual review of the Force integrity programme and implement identified improvements |
| OWNER | Head of Strategic Development |
| AIM/RATIONALE | To ensure the Force continues to develop its approach to integrity and has plans to embed best practice. |
| MEASUREMENT | Review completed and reported to ISB |
| DUE BY | September 2021 |
| TRAFFIC LIGHT CRITERIA | Green: Review complete and action plan amended Amber: review complete but action plan unamended or review overdue by 1-3 months Red: Review overdue by 3 months or more with unamended action plan. |
| TRAFFIC LIGHT | WHITE |
| CURRENT POSITION | |
| The review will not take place until June/July 2021. | |

| 2 Development Measures | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| MEASURE | 2.4 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assessment report |
| OWNER | Head of Strategic Development (and any other relevant individual identified by the report) |
| AIM/RATIONALE | To ensure the Force actions best practice identified by HMICFRS. |
| MEASUREMENT | Progress reported to Performance Management Group and ISB |
| DUE BY | March 2020 |
| TRAFFIC LIGHT CRITERIA | Green: All AFIs delivered; Amber: Action in progress to deliver AFIs but not fully delivered; Red: AFI not delivered by due date |
| TRAFFIC LIGHT | GREEN |
| CURRENT POSITION | |
| <p>The Integrated PEEL report was published in early May. Whilst the Force was graded ‘Requires improvement’ for the Legitimacy aspect of the inspection, two of the areas identified for further improvement are relevant to integrity and the Code of Ethics:</p> <p>AFI 7 and 8 – the Force should review is external scrutiny of use of force and stop and search</p> <p>AFI 9 – the Force should extend its unconscious bias training to all its officers</p> <p>AFI 10 – The Force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up to date and include current data</p> <p>AFI 11 – The Force should ensure that its counter corruption unit (1) has enough capability and capacity to counter corruption effectively and proactively; (2) Can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the Force’s data and indentify computer misuse; and (3) Builds effective relationships with individuals and organisations that support and work with vulnerable people.</p> <p>August 2019 update: An action plan to address all the AFIs identified in the report has been drafted. A report has been submitted to the next Professional Standards and Integrity Committee (18th September) providing details of the Force’s response to these AFIs. This indicator will remain open until all actions have been delivered.</p> <p>February 2020 update: AFIs 7 and 8 remain AMBER. Both areas were scrutinised by the PAB at its November meeting through the Use of Force (part of the Custody update) and stop and search update. A revised group now exists. Training of members of the group is ongoing, with a first meeting to assess data scheduled for March 11th. Following that meeting taking place, this should be GREEN.</p> <p>AFI 9 is GREEN – training commenced in November 2019, with completion being tracked by Learning and Development and reported to Performance Management Group.</p> <p>AFI 10 is AMBER – these documents were reviewed for 2018/19 but are now being re-evaluated for 2019/20. A National 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> | |

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).

November 2020 Update

AFI 12 is now RED having missed the deadline to have the software in place by the end of September 2020. There are sensitivities relating to this software, therefore a fuller update can be provided by the Detective Superintendent PSD in the non-public section of your Committee.

January 2021 Update: The relevant software is procured and is being installed in February 2021. All actions are now complete.

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Police complaints:

Statistics for England and Wales
2019/20

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1

Introduction

This report presents figures on complaints recorded about the police in England and Wales in 2019/20 under the 2012 complaints regime¹ only. These complaints, made by members of the public, are about either the conduct of people serving with the police, or how a police force is run (a ‘direction and control’ complaint). They are dealt with under the *Police Reform Act 2002*.

Police forces deal with the majority of complaints, with the IOPC handling only the most serious and sensitive cases. The first stage of complaint handling is for the relevant police force to decide whether to record the complaint². When a complaint is recorded, it must be dealt with according to certain rules and guidance. If the force does not record a complaint, the complainant can appeal to the IOPC against this decision.

People can also appeal once their complaint has been finalised if they are not happy with how the police handled it. In some instances, this appeal right is to the IOPC. Other appeals are handled by police forces.

Unlike previous editions of our annual complaint statistics, we have not included a detailed discussion of the findings and what they might indicate about how the police complaints system is performing. This is because of changes to the complaints system introduced on 1 February 2020. Complaints recorded from 1 February 2020 are not included in this report and will be published alongside the 2020/21 statistics.

The changes to the complaints system are significant and we know that some forces began to adopt the spirit of the reforms throughout the year. In this context and without a full year’s data, it would not be meaningful to compare these statistics to previous years, establish trends and draw conclusions about any changes.

The majority of the data referred to in this report has been recorded on police force IT systems and collected by the IOPC to produce these statistics. We have issued police forces with guidance, which sets out how we expect them to record the data we collect from them. Therefore, the

¹ The 2012 complaints regime is governed by the Police (Complaints and Misconduct) Regulations 2012. On 1 February 2020, these were replaced by the Police (Complaints and Misconduct) Regulations 2020. Complaints recorded from 1 February 2020 are not included in this report. They will be formally published alongside the 2020/21 statistics next year.

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

consistency of the data we report relies on police forces applying our guidance correctly when they record their data. Our [guidance on how police forces should record data about complaints under the *Police Reform Act 2002* is available on our website](#).

You can [read more about our work on our website](#). Our annual reports and monthly Roundup provide an overview of our own performance in relation to investigations, appeals and the complaints that we handle.

2

Tables

Table 1: Complaint cases recorded 2001/02 – 2019/20

| | 2001/02 | 2002/03 | 2003/04 | 2004/05 |
|-------------------------------|---------|----------|------------|-----------|
| Total recorded in year | 16,654 | 15,248 | 15,885 | 22,898 |
| | 2005/06 | 2006/07* | 2007/08 | 2008/09 |
| Total recorded in year | 26,268 | 29,322 | 29,350 | 31,747 |
| | 2009/10 | 2010/11 | 2011/12 | 2012/13** |
| Total recorded in year | 34,310 | 33,099 | 30,143 | 30,365 |
| | 2013/14 | 2014/15 | 2015/16 | 2016/17 |
| Total recorded in year | 34,863 | 37,105 | 34,247 | 34,103 |
| | 2017/18 | 2018/19 | 2019/20*** | |
| Total recorded in year | 31,671 | 31,097 | 28,223 | |

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

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

*** As complaints were no longer recorded under this regime from 1 February 2020, this count is not a total year count and cannot therefore be compared to 2018/19 as a percentage annual change.

Table 2: Complaint cases recorded in 2018/19 and 2019/20

| Police force | 2018/19 | 2019/20* |
|--------------------------|----------------|-----------------|
| Avon and Somerset | 871 | 799 |
| Bedfordshire | 352 | 350 |
| British Transport Police | 315 | 308 |
| Cambridgeshire | 338 | 372 |
| Cheshire | 423 | 336 |
| City of London** | 68 | 118 |
| Cleveland | 473 | 314 |
| Cumbria | 300 | 280 |
| Derbyshire | 515 | 450 |
| Devon and Cornwall | 1,342 | 1,006 |
| Dorset | 540 | 422 |
| Durham | 355 | 255 |
| Dyfed-Powys | 291 | 282 |
| Essex | 624 | 718 |
| Gloucestershire | 387 | 312 |
| Greater Manchester | 1,571 | 1,285 |
| Gwent | 332 | 199 |
| Hampshire | 686 | 591 |
| Hertfordshire | 449 | 455 |
| Humberside | 860 | 963 |
| Kent | 751 | 577 |
| Lancashire | 559 | 550 |
| Leicestershire | 466 | 381 |
| Lincolnshire | 571 | 574 |
| Merseyside | 365 | 267 |
| Metropolitan | 5,418 | 5,566 |
| Norfolk | 360 | 370 |
| North Wales | 355 | 229 |
| North Yorkshire | 322 | 303 |
| Northamptonshire | 465 | 413 |
| Northumbria | 768 | 741 |
| Nottinghamshire | 1,012 | 805 |
| South Wales | 893 | 1,052 |
| South Yorkshire | 598 | 489 |
| Staffordshire | 496 | 350 |
| Suffolk | 281 | 270 |
| Surrey | 392 | 354 |
| Sussex | 883 | 885 |
| Thames Valley | 1,221 | 1,210 |
| Warwickshire | 274 | 195 |
| West Mercia | 713 | 560 |
| West Midlands | 501 | 355 |
| West Yorkshire | 1,737 | 1,279 |
| Wiltshire | 604 | 633 |
| Total | 31,097 | 28,223 |

* As complaints were no longer recorded under this regime from 1 February 2020, this count is not a total year count and cannot therefore be compared to 2018/19 as a percentage annual change.

** The figures for City of London also include complaint cases recorded in relation to 'Action Fraud'. Action Fraud is a national service provided by City of London Police, which receives and records allegations and intelligence relating to crimes of fraud.

Table 3: Complaint cases recorded in time 2015/16 to 2019/20 (continues on next page)

| Police force | 2015/16 | | 2016/17 | | 2017/18 | |
|--------------------------|---------------------------|--------------------------|---------------------------|--------------------------|---------------------------|--------------------------|
| | Complaint cases recorded* | % within 10 working days | Complaint cases recorded* | % within 10 working days | Complaint cases recorded* | % within 10 working days |
| Avon and Somerset | 1,158 | 94 | 1,019 | 97 | 919 | 97 |
| Bedfordshire | 363 | 93 | 488 | 90 | 442 | 92 |
| British Transport Police | 350 | 98 | 371 | 97 | 305 | 98 |
| Cambridgeshire | 367 | 94 | 383 | 91 | 328 | 88 |
| Cheshire | 537 | 96 | 595 | 96 | 524 | 96 |
| City of London | 261 | 94 | 276 | 99 | 233 | 98 |
| Cleveland | 609 | 75 | 454 | 84 | 487 | 88 |
| Cumbria | 307 | 89 | 307 | 86 | 335 | 86 |
| Derbyshire | 441 | 90 | 383 | 88 | 387 | 87 |
| Devon and Cornwall | 1,218 | 97 | 1,188 | 98 | 1,216 | 73 |
| Dorset | 489 | 93 | 506 | 94 | 537 | 94 |
| Durham | 399 | 94 | 314 | 93 | 330 | 89 |
| Dyfed-Powys | 256 | 94 | 274 | 91 | 313 | 93 |
| Essex | 945 | 93 | 806 | 91 | 602 | 93 |
| Gloucestershire | 381 | 92 | 431 | 95 | 403 | 92 |
| Greater Manchester | 1,616 | 89 | 1,537 | 82 | 1,518 | 55 |
| Gwent | 325 | 88 | 287 | 96 | 266 | 91 |
| Hampshire | 868 | 90 | 931 | 90 | 960 | 90 |
| Hertfordshire | 496 | 95 | 518 | 90 | 533 | 93 |
| Humberside | 529 | 73 | 760 | 61 | 908 | 57 |
| Kent | 842 | 88 | 762 | 95 | 721 | 91 |
| Lancashire | 884 | 79 | 997 | 89 | 756 | 85 |
| Leicestershire | 689 | 92 | 662 | 93 | 536 | 93 |
| Lincolnshire | 549 | 93 | 596 | 89 | 488 | 98 |
| Merseyside | 458 | 91 | 548 | 86 | 469 | 88 |
| Metropolitan | 6,293 | 86 | 5,836 | 63 | 5,071 | 77 |
| Norfolk | 413 | 95 | 416 | 93 | 461 | 87 |
| North Wales | 441 | 91 | 452 | 95 | 484 | 96 |
| North Yorkshire | 291 | 85 | 331 | 85 | 283 | 81 |
| Northamptonshire | 473 | 92 | 509 | 94 | 483 | 95 |
| Northumbria | 716 | 92 | 758 | 93 | 738 | 91 |
| Nottinghamshire | 967 | 95 | 670 | 94 | 871 | 96 |
| South Wales | 807 | 80 | 770 | 88 | 604 | 92 |
| South Yorkshire | 602 | 90 | 607 | 77 | 460 | 91 |
| Staffordshire | 410 | 89 | 421 | 84 | 433 | 88 |
| Suffolk | 289 | 97 | 317 | 92 | 337 | 87 |
| Surrey | 515 | 91 | 482 | 86 | 406 | 78 |
| Sussex | 916 | 77 | 935 | 72 | 1,127 | 80 |
| Thames Valley | 1,304 | 93 | 1,346 | 97 | 1,303 | 95 |
| Warwickshire | 259 | 80 | 415 | 95 | 328 | 91 |
| West Mercia | 509 | 80 | 733 | 95 | 686 | 86 |
| West Midlands | 1,168 | 73 | 882 | 43 | 777 | 31 |
| West Yorkshire | 1,867 | 94 | 2,167 | 96 | 1,708 | 96 |
| Wiltshire | 665 | 80 | 663 | 96 | 595 | 96 |
| Total | 34,242 | 88 | 34,103 | 84 | 31,671 | 84 |

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

* The number of complaint cases presented in this table are only those with valid dates that are used in the calculation for % complaint cases recorded within 10 working days. Therefore they may not match the actual number of recorded complaint cases presented in Table 2.

Table 3: Complaint cases recorded in time 2015/16 to 2019/20 (continued)

| Police force | 2018/19 | | 2019/20 | |
|--------------------------|---------------------------|--------------------------|---------------------------|--------------------------|
| | Complaint cases recorded* | % within 10 working days | Complaint cases recorded* | % within 10 working days |
| Avon and Somerset | 871 | 98 | 799 | 97 |
| Bedfordshire | 352 | 93 | 350 | 92 |
| British Transport Police | 315 | 93 | 308 | 79 |
| Cambridgeshire | 338 | 96 | 372 | 95 |
| Cheshire | 423 | 97 | 336 | 99 |
| City of London | 68 | 85 | 118 | 80 |
| Cleveland | 473 | 93 | 314 | 83 |
| Cumbria | 300 | 93 | 280 | 91 |
| Derbyshire | 515 | 92 | 450 | 90 |
| Devon and Cornwall | 1,342 | 97 | 1,006 | 80 |
| Dorset | 540 | 95 | 422 | 92 |
| Durham | 355 | 96 | 255 | 96 |
| Dyfed-Powys | 291 | 97 | 282 | 91 |
| Essex | 624 | 95 | 718 | 93 |
| Gloucestershire | 387 | 70 | 312 | 68 |
| Greater Manchester | 1,571 | 88 | 1,285 | 98 |
| Gwent | 332 | 95 | 199 | 75 |
| Hampshire | 686 | 91 | 591 | 70 |
| Hertfordshire | 449 | 94 | 455 | 92 |
| Humberside | 860 | 79 | 963 | 94 |
| Kent | 751 | 96 | 577 | 93 |
| Lancashire | 559 | 77 | 550 | 86 |
| Leicestershire | 466 | 98 | 381 | 97 |
| Lincolnshire | 571 | 97 | 574 | 96 |
| Merseyside | 365 | 92 | 267 | 79 |
| Metropolitan | 5,418 | 90 | 5,566 | 77 |
| Norfolk | 360 | 90 | 370 | 81 |
| North Wales | 355 | 96 | 229 | 93 |
| North Yorkshire | 322 | 83 | 303 | 84 |
| Northamptonshire | 465 | 91 | 413 | 94 |
| Northumbria | 768 | 97 | 741 | 93 |
| Nottinghamshire | 1,012 | 92 | 805 | 87 |
| South Wales | 893 | 92 | 1,052 | 90 |
| South Yorkshire | 598 | 89 | 489 | 87 |
| Staffordshire | 496 | 82 | 350 | 87 |
| Suffolk | 281 | 91 | 270 | 83 |
| Surrey | 392 | 77 | 354 | 81 |
| Sussex | 883 | 85 | 885 | 82 |
| Thames Valley | 1,221 | 97 | 1,210 | 96 |
| Warwickshire | 274 | 93 | 195 | 97 |
| West Mercia | 713 | 92 | 560 | 89 |
| West Midlands | 501 | 26 | 355 | 15 |
| West Yorkshire | 1,737 | 93 | 1,279 | 87 |
| Wiltshire | 604 | 50 | 633 | 94 |
| Total | 31,097 | 89 | 28,223 | 86 |

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

* The number of complaint cases presented in this table are only those with valid dates that are used in the calculation for % complaint cases recorded within 10 working days. Therefore they may not match the actual number of recorded complaint cases presented in Table 2.

Table 4: Number of allegations recorded in 2018/19 and 2019/20

| Police force | Number of allegations 2018/19 | Number of allegations 2019/20* |
|--------------------------|------------------------------------------|-------------------------------------------|
| Avon and Somerset | 1,846 | 1,631 |
| Bedfordshire | 904 | 896 |
| British Transport Police | 634 | 580 |
| Cambridgeshire | 783 | 923 |
| Cheshire | 1,033 | 722 |
| City of London** | 170 | 180 |
| Cleveland | 725 | 640 |
| Cumbria | 455 | 418 |
| Derbyshire | 852 | 746 |
| Devon and Cornwall | 2,527 | 2,024 |
| Dorset | 753 | 534 |
| Durham | 559 | 465 |
| Dyfed-Powys | 538 | 514 |
| Essex | 1,531 | 2,021 |
| Gloucestershire | 737 | 851 |
| Greater Manchester | 2,697 | 2,181 |
| Gwent | 701 | 473 |
| Hampshire | 1,150 | 1,033 |
| Hertfordshire | 1,277 | 1,253 |
| Humberside | 1,261 | 1,325 |
| Kent | 1,363 | 1,126 |
| Lancashire | 1,020 | 1,005 |
| Leicestershire | 1,124 | 1,024 |
| Lincolnshire | 791 | 925 |
| Merseyside | 1,390 | 916 |
| Metropolitan | 11,085 | 11,437 |
| Norfolk | 760 | 736 |
| North Wales | 872 | 528 |
| North Yorkshire | 688 | 783 |
| Northamptonshire | 972 | 770 |
| Northumbria | 1,625 | 1,619 |
| Nottinghamshire | 1,569 | 1,385 |
| South Wales | 1,217 | 1,340 |
| South Yorkshire | 1,202 | 893 |
| Staffordshire | 1,008 | 672 |
| Suffolk | 636 | 594 |
| Surrey | 1,369 | 1,167 |
| Sussex | 1,319 | 1,465 |
| Thames Valley | 1,787 | 1,603 |
| Warwickshire | 333 | 241 |
| West Mercia | 839 | 659 |
| West Midlands | 1,030 | 684 |
| West Yorkshire | 2,528 | 2,166 |
| Wiltshire | 818 | 867 |
| Total | 58,478 | 54,015 |

* As complaints were no longer recorded under this regime from 1 February 2020, this count is not a total year count and cannot therefore be compared to 2018/19 as a percentage annual change.

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

Table 5: Nature of allegations recorded in 2019/20

| Allegation groupings | Allegation category | N | % |
|-----------------------------------|---------------------------------------------------------------------------|---------------|------------|
| Oppressive behaviour | Serious non-sexual assault | 153 | 0 |
| | Sexual assault | 109 | 0 |
| | Other assault | 3,954 | 7 |
| | Oppressive conduct or harassment | 2,460 | 5 |
| | Unlawful/unnecessary arrest or detention | 1,764 | 3 |
| Malpractice | Irregularity in relation to evidence/perjury | 692 | 1 |
| | Corruption or malpractice | 536 | 1 |
| | Mishandling of property | 1,474 | 3 |
| Breach of PACE | Breach of Code A PACE on stop and search | 355 | 1 |
| | Breach of Code B PACE on searching of premises and seizure of property | 883 | 2 |
| | Breach of Code C PACE on detention, treatment and questioning | 1,875 | 3 |
| | Breach of Code D PACE on identification procedures | 15 | 0 |
| | Breach of Code E PACE on tape recording | 25 | 0 |
| | Unspecified breaches of PACE which cannot be allocated to a specific code | 63 | 0 |
| Lack of fairness and impartiality | Lack of fairness and impartiality | 2,407 | 4 |
| Discriminatory behaviour | Discriminatory behaviour | 1,616 | 3 |
| Other neglect of duty | Other neglect or failure in duty | 21,946 | 41 |
| Incivility | Incivility, impoliteness and intolerance | 6,321 | 12 |
| Traffic | Traffic irregularity | 416 | 1 |
| Other | Other irregularity in procedure | 3,335 | 6 |
| | Improper access and/or disclosure of information | 1,351 | 3 |
| | Other sexual conduct | 53 | 0 |
| | Other | 1,137 | 2 |
| Direction and control | General policing standards | 432 | 1 |
| | Operational management decisions | 111 | 0 |
| | Operational policing policies | 268 | 0 |
| | Organisational decisions | 264 | 0 |
| Total allegations | | 54,015 | 100 |

Table 6: Number of allegations recorded per 1,000 employees in 2019/20

| Police force | Allegations recorded against employees only | Number of employees* | Allegations per 1,000 employees |
|--------------------------|----------------------------------------------------|-----------------------------|----------------------------------------|
| Avon and Somerset | 1,599 | 5,590 | 286 |
| Bedfordshire | 884 | 2,408 | 367 |
| British Transport Police | 557 | 4,833 | 115 |
| Cambridgeshire | 915 | 2,578 | 355 |
| Cheshire | 716 | 3,922 | 183 |
| City of London | 106 | 1,248 | 85 |
| Cleveland | 625 | 1,744 | 358 |
| Cumbria | 404 | 1,907 | 212 |
| Derbyshire | 719 | 3,393 | 212 |
| Devon and Cornwall | 1,827 | 5,328 | 343 |
| Dorset | 534 | 2,550 | 209 |
| Durham | 460 | 2,196 | 209 |
| Dyfed-Powys | 510 | 2,028 | 251 |
| Essex | 2,005 | 5,700 | 352 |
| Gloucestershire | 843 | 2,076 | 406 |
| Greater Manchester | 2,171 | 10,976 | 198 |
| Gwent | 460 | 2,115 | 217 |
| Hampshire | 971 | 5,077 | 191 |
| Hertfordshire | 1,239 | 3,897 | 318 |
| Humberside | 1,271 | 3,414 | 372 |
| Kent | 1,111 | 6,427 | 173 |
| Lancashire | 990 | 5,277 | 188 |
| Leicestershire | 1,014 | 3,624 | 280 |
| Lincolnshire | 836 | 1,697 | 493 |
| Merseyside | 912 | 5,812 | 157 |
| Metropolitan | 11,302 | 42,658 | 265 |
| Norfolk | 734 | 2,902 | 253 |
| North Wales | 519 | 2,836 | 183 |
| North Yorkshire | 764 | 2,769 | 276 |
| Northamptonshire | 760 | 2,388 | 318 |
| Northumbria | 1,618 | 4,960 | 326 |
| Nottinghamshire | 1,356 | 3,469 | 391 |
| South Wales | 1,315 | 5,377 | 245 |
| South Yorkshire | 854 | 4,783 | 179 |
| Staffordshire | 653 | 3,187 | 205 |
| Suffolk | 592 | 2,143 | 276 |
| Surrey | 1,154 | 3,712 | 311 |
| Sussex | 1,403 | 4,916 | 285 |
| Thames Valley | 1,598 | 7,754 | 206 |
| Warwickshire | 240 | 1,673 | 143 |
| West Mercia | 644 | 3,834 | 168 |
| West Midlands | 648 | 10,408 | 62 |
| West Yorkshire | 2,161 | 9,621 | 225 |
| Wiltshire | 842 | 2,288 | 368 |
| Total | 52,836 | 217,495 | 243 |

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

* 'Number of employees' is taken from the Home Office publication *Police Workforce, England and Wales, 31 March 2019*.

Table 7: Means by which allegations were finalised in 2019/20

| Police force | Local resolution | | Investigation | | Withdrawn | | Disapplication | | Discontinuance | | Unknown | | Total |
|--------------------------|------------------|-----------|---------------|-----------|--------------|----------|----------------|----------|----------------|----------|-----------|----------|---------------|
| | N | % | N | % | N | % | N | % | N | % | N | % | N |
| Avon and Somerset | 993 | 56 | 563 | 32 | 99 | 6 | 114 | 6 | 12 | 1 | 0 | 0 | 1,781 |
| Bedfordshire | 428 | 42 | 453 | 44 | 78 | 8 | 44 | 4 | 23 | 2 | 0 | 0 | 1,026 |
| British Transport Police | 80 | 14 | 452 | 79 | 40 | 7 | 0 | 0 | 2 | 0 | 0 | 0 | 574 |
| Cambridgeshire | 473 | 49 | 345 | 35 | 51 | 5 | 83 | 9 | 22 | 2 | 0 | 0 | 974 |
| Cheshire | 430 | 59 | 254 | 35 | 29 | 4 | 7 | 1 | 8 | 1 | 0 | 0 | 728 |
| City of London | 87 | 60 | 48 | 33 | 7 | 5 | 2 | 1 | 1 | 1 | 0 | 0 | 145 |
| Cleveland | 352 | 72 | 85 | 17 | 13 | 3 | 26 | 5 | 10 | 2 | 0 | 0 | 486 |
| Cumbria | 329 | 70 | 103 | 22 | 16 | 3 | 16 | 3 | 4 | 1 | 0 | 0 | 468 |
| Derbyshire | 491 | 57 | 250 | 29 | 48 | 6 | 4 | 0 | 66 | 8 | 0 | 0 | 859 |
| Devon and Cornwall | 1,288 | 61 | 565 | 27 | 143 | 7 | 124 | 6 | 8 | 0 | 0 | 0 | 2,128 |
| Dorset | 410 | 65 | 88 | 14 | 45 | 7 | 82 | 13 | 5 | 1 | 0 | 0 | 630 |
| Durham | 239 | 48 | 199 | 40 | 17 | 3 | 46 | 9 | 1 | 0 | 0 | 0 | 502 |
| Dyfed-Powys | 271 | 49 | 189 | 34 | 49 | 9 | 40 | 7 | 4 | 1 | 0 | 0 | 553 |
| Essex | 638 | 36 | 958 | 54 | 132 | 7 | 37 | 2 | 0 | 0 | 0 | 0 | 1,765 |
| Gloucestershire | 577 | 68 | 133 | 16 | 27 | 3 | 100 | 12 | 6 | 1 | 0 | 0 | 843 |
| Greater Manchester | 1,742 | 65 | 617 | 23 | 190 | 7 | 68 | 3 | 26 | 1 | 25 | 1 | 2,668 |
| Gwent | 42 | 12 | 168 | 49 | 116 | 34 | 17 | 5 | 0 | 0 | 0 | 0 | 343 |
| Hampshire | 646 | 66 | 211 | 22 | 71 | 7 | 45 | 5 | 7 | 1 | 0 | 0 | 980 |
| Hertfordshire | 498 | 36 | 715 | 51 | 90 | 6 | 64 | 5 | 30 | 2 | 0 | 0 | 1,397 |
| Humberside | 1,045 | 73 | 215 | 15 | 116 | 8 | 52 | 4 | 7 | 0 | 0 | 0 | 1,435 |
| Kent | 556 | 44 | 490 | 39 | 131 | 10 | 80 | 6 | 1 | 0 | 0 | 0 | 1,258 |
| Lancashire | 603 | 50 | 441 | 37 | 82 | 7 | 71 | 6 | 3 | 0 | 0 | 0 | 1,200 |
| Leicestershire | 584 | 55 | 328 | 31 | 68 | 6 | 58 | 6 | 15 | 1 | 0 | 0 | 1,053 |
| Lincolnshire | 643 | 70 | 197 | 21 | 52 | 6 | 30 | 3 | 0 | 0 | 0 | 0 | 922 |
| Merseyside | 469 | 49 | 376 | 39 | 21 | 2 | 88 | 9 | 10 | 1 | 0 | 0 | 964 |
| Metropolitan | 2,251 | 21 | 7,325 | 68 | 687 | 6 | 518 | 5 | 13 | 0 | 0 | 0 | 10,794 |
| Norfolk | 408 | 54 | 274 | 36 | 47 | 6 | 23 | 3 | 10 | 1 | 0 | 0 | 762 |
| North Wales | 326 | 45 | 377 | 52 | 15 | 2 | 5 | 1 | 1 | 0 | 0 | 0 | 724 |
| North Yorkshire | 611 | 77 | 63 | 8 | 29 | 4 | 91 | 11 | 0 | 0 | 0 | 0 | 794 |
| Northamptonshire | 486 | 59 | 264 | 32 | 41 | 5 | 14 | 2 | 22 | 3 | 0 | 0 | 827 |
| Northumbria | 557 | 31 | 924 | 52 | 171 | 10 | 91 | 5 | 40 | 2 | 0 | 0 | 1,783 |
| Nottinghamshire | 1,261 | 77 | 246 | 15 | 86 | 5 | 23 | 1 | 16 | 1 | 0 | 0 | 1,632 |
| South Wales | 585 | 43 | 552 | 41 | 109 | 8 | 100 | 7 | 12 | 1 | 0 | 0 | 1,358 |
| South Yorkshire | 733 | 64 | 221 | 19 | 65 | 6 | 94 | 8 | 37 | 3 | 0 | 0 | 1,150 |
| Staffordshire | 323 | 41 | 411 | 52 | 40 | 5 | 10 | 1 | 0 | 0 | 0 | 0 | 784 |
| Suffolk | 294 | 52 | 230 | 40 | 19 | 3 | 23 | 4 | 4 | 1 | 0 | 0 | 570 |
| Surrey | 848 | 68 | 325 | 26 | 38 | 3 | 35 | 3 | 2 | 0 | 0 | 0 | 1,248 |
| Sussex | 860 | 65 | 251 | 19 | 61 | 5 | 158 | 12 | 1 | 0 | 0 | 0 | 1,331 |
| Thames Valley | 1,448 | 76 | 276 | 15 | 45 | 2 | 131 | 7 | 0 | 0 | 0 | 0 | 1,900 |
| Warwickshire | 63 | 26 | 137 | 56 | 18 | 7 | 20 | 8 | 8 | 3 | 0 | 0 | 246 |
| West Mercia | 153 | 24 | 390 | 62 | 29 | 5 | 56 | 9 | 4 | 1 | 0 | 0 | 632 |
| West Midlands | 345 | 54 | 213 | 33 | 30 | 5 | 42 | 7 | 9 | 1 | 0 | 0 | 639 |
| West Yorkshire | 1,145 | 50 | 952 | 41 | 148 | 6 | 50 | 2 | 6 | 0 | 0 | 0 | 2,301 |
| Wiltshire | 345 | 68 | 93 | 18 | 23 | 4 | 21 | 4 | 26 | 5 | 0 | 0 | 517 |
| Total | 26,965 | 48 | 21,967 | 39 | 3,432 | 6 | 2,803 | 5 | 482 | 1 | 25 | 0 | 55,674 |

Table 8: Time taken to finalise allegations in 2019/20

| Police force | Local resolution | | Local investigation | | Supervised investigation | |
|--------------------------|------------------------------------------------|--------------------------------------------|------------------------------------------------|--------------------------------------------|------------------------------------------------|--------------------------------------------|
| | Average number of days to finalise allegations | Number of allegations used in calculation* | Average number of days to finalise allegations | Number of allegations used in calculation* | Average number of days to finalise allegations | Number of allegations used in calculation* |
| Avon and Somerset | 46 | 990 | 163 | 550 | - | 0 |
| Bedfordshire | 52 | 427 | 155 | 447 | - | 0 |
| British Transport Police | 34 | 79 | 117 | 452 | - | 0 |
| Cambridgeshire | 53 | 473 | 122 | 343 | - | 0 |
| Cheshire | 46 | 430 | 91 | 244 | - | 0 |
| City of London | 86 | 87 | 87 | 43 | - | 0 |
| Cleveland | 98 | 352 | 181 | 85 | - | 0 |
| Cumbria | 48 | 328 | 130 | 103 | - | 0 |
| Derbyshire | 67 | 491 | 100 | 250 | - | 0 |
| Devon and Cornwall | 69 | 1,287 | 193 | 560 | - | 0 |
| Dorset | 68 | 410 | 196 | 87 | - | 0 |
| Durham | 78 | 237 | 167 | 199 | - | 0 |
| Dyfed-Powys | 53 | 271 | 133 | 189 | - | 0 |
| Essex | 71 | 638 | 165 | 940 | - | 0 |
| Gloucestershire | 74 | 577 | 205 | 133 | - | 0 |
| Greater Manchester | 113 | 1,741 | 177 | 570 | - | 0 |
| Gwent | 69 | 42 | 114 | 166 | - | 0 |
| Hampshire | 99 | 646 | 155 | 210 | - | 0 |
| Hertfordshire | 54 | 498 | 130 | 714 | - | 0 |
| Humberside | 86 | 1,045 | 187 | 211 | - | 0 |
| Kent | 61 | 555 | 158 | 467 | - | 0 |
| Lancashire | 96 | 603 | 182 | 434 | - | 0 |
| Leicestershire | 52 | 578 | 170 | 324 | - | 0 |
| Lincolnshire | 60 | 643 | 135 | 197 | - | 0 |
| Merseyside | 82 | 469 | 168 | 362 | - | 0 |
| Metropolitan | 73 | 2,146 | 142 | 5,375 | 473 | 4 |
| Norfolk | 89 | 408 | 103 | 273 | - | 0 |
| North Wales | 90 | 326 | 220 | 373 | 560 | 2 |
| North Yorkshire | 94 | 611 | 137 | 58 | - | 0 |
| Northamptonshire | 45 | 486 | 226 | 256 | - | 0 |
| Northumbria | 60 | 557 | 132 | 921 | - | 0 |
| Nottinghamshire | 70 | 1,261 | 180 | 238 | - | 0 |
| South Wales | 77 | 583 | 171 | 536 | 1,172 | 7 |
| South Yorkshire | 83 | 731 | 176 | 188 | - | 0 |
| Staffordshire | 60 | 322 | 145 | 408 | - | 0 |
| Suffolk | 89 | 294 | 126 | 225 | - | 0 |
| Surrey | 59 | 848 | 127 | 325 | - | 0 |
| Sussex | 58 | 854 | 231 | 249 | - | 0 |
| Thames Valley | 80 | 1,448 | 148 | 271 | - | 0 |
| Warwickshire | 54 | 63 | 124 | 134 | - | 0 |
| West Mercia | 77 | 153 | 115 | 389 | - | 0 |
| West Midlands | 101 | 345 | 227 | 200 | - | 0 |
| West Yorkshire | 41 | 1,139 | 133 | 951 | - | 0 |
| Wiltshire | 109 | 354 | 196 | 89 | - | 0 |
| Total | 73 | 26,826 | 151 | 19,739 | 863 | 13 |

* The number of allegations presented in this table are only those with valid dates that are used in the calculation for the average number of days to finalise allegations. Therefore, they may not match the actual number of raised allegations presented in Table 7.

Table 9: Allegations finalised by investigation in 2019/20

| Police force | Not subject to special requirements | | Subject to special requirements* | | Total investigated |
|--------------------------|-------------------------------------|-----------|----------------------------------|-----------|--------------------|
| | N | % | N | % | N |
| Avon and Somerset | 526 | 93 | 37 | 7 | 563 |
| Bedfordshire | 425 | 94 | 28 | 6 | 453 |
| British Transport Police | 347 | 77 | 105 | 23 | 452 |
| Cambridgeshire | 333 | 97 | 12 | 3 | 345 |
| Cheshire | 252 | 99 | 2 | 1 | 254 |
| City of London | 48 | 100 | 0 | 0 | 48 |
| Cleveland | 81 | 95 | 4 | 5 | 85 |
| Cumbria | 101 | 98 | 2 | 2 | 103 |
| Derbyshire | 247 | 99 | 3 | 1 | 250 |
| Devon and Cornwall | 511 | 90 | 54 | 10 | 565 |
| Dorset | 82 | 93 | 6 | 7 | 88 |
| Durham | 182 | 91 | 17 | 9 | 199 |
| Dyfed-Powys | 188 | 99 | 1 | 1 | 189 |
| Essex | 870 | 91 | 88 | 9 | 958 |
| Gloucestershire | 90 | 68 | 43 | 32 | 133 |
| Greater Manchester | 531 | 86 | 86 | 14 | 617 |
| Gwent | 154 | 92 | 14 | 8 | 168 |
| Hampshire | 203 | 96 | 8 | 4 | 211 |
| Hertfordshire | 675 | 94 | 40 | 6 | 715 |
| Humberside | 203 | 94 | 12 | 6 | 215 |
| Kent | 450 | 92 | 40 | 8 | 490 |
| Lancashire | 424 | 96 | 17 | 4 | 441 |
| Leicestershire | 300 | 91 | 28 | 9 | 328 |
| Lincolnshire | 182 | 92 | 15 | 8 | 197 |
| Merseyside | 351 | 93 | 25 | 7 | 376 |
| Metropolitan | 6,416 | 88 | 909 | 12 | 7,325 |
| Norfolk | 269 | 98 | 5 | 2 | 274 |
| North Wales | 364 | 97 | 13 | 3 | 377 |
| North Yorkshire | 46 | 73 | 17 | 27 | 63 |
| Northamptonshire | 218 | 83 | 46 | 17 | 264 |
| Northumbria | 863 | 93 | 61 | 7 | 924 |
| Nottinghamshire | 202 | 82 | 44 | 18 | 246 |
| South Wales | 499 | 90 | 53 | 10 | 552 |
| South Yorkshire | 136 | 62 | 85 | 38 | 221 |
| Staffordshire | 387 | 94 | 24 | 6 | 411 |
| Suffolk | 227 | 99 | 3 | 1 | 230 |
| Surrey | 321 | 99 | 4 | 1 | 325 |
| Sussex | 213 | 85 | 38 | 15 | 251 |
| Thames Valley | 251 | 91 | 25 | 9 | 276 |
| Warwickshire | 117 | 85 | 20 | 15 | 137 |
| West Mercia | 360 | 92 | 30 | 8 | 390 |
| West Midlands | 195 | 92 | 18 | 8 | 213 |
| West Yorkshire | 932 | 98 | 20 | 2 | 952 |
| Wiltshire | 86 | 92 | 7 | 8 | 93 |
| Total | 19,858 | 90 | 2,109 | 10 | 21,967 |

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

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

Table 9a: Result of allegations finalised by investigation not subject to special requirements in 2019/20

| Police force | Not upheld | | Upheld | | Total investigated not subject to special requirements* |
|--------------------------|---------------|-----------|--------------|-----------|---------------------------------------------------------|
| | N | % | N | % | N |
| Avon and Somerset | 477 | 91 | 49 | 9 | 526 |
| Bedfordshire | 391 | 92 | 34 | 8 | 425 |
| British Transport Police | 276 | 80 | 71 | 20 | 347 |
| Cambridgeshire | 316 | 95 | 17 | 5 | 333 |
| Cheshire | 229 | 91 | 23 | 9 | 252 |
| City of London | 44 | 92 | 4 | 8 | 48 |
| Cleveland | 74 | 91 | 7 | 9 | 81 |
| Cumbria | 85 | 84 | 16 | 16 | 101 |
| Derbyshire | 230 | 93 | 17 | 7 | 247 |
| Devon and Cornwall | 442 | 86 | 69 | 14 | 511 |
| Dorset | 71 | 87 | 11 | 13 | 82 |
| Durham | 157 | 86 | 25 | 14 | 182 |
| Dyfed-Powys | 175 | 93 | 13 | 7 | 188 |
| Essex | 748 | 86 | 122 | 14 | 870 |
| Gloucestershire | 62 | 69 | 28 | 31 | 90 |
| Greater Manchester | 495 | 93 | 36 | 7 | 531 |
| Gwent | 120 | 78 | 34 | 22 | 154 |
| Hampshire | 189 | 93 | 14 | 7 | 203 |
| Hertfordshire | 634 | 94 | 41 | 6 | 675 |
| Humberside | 176 | 87 | 27 | 13 | 203 |
| Kent | 313 | 70 | 137 | 30 | 450 |
| Lancashire | 388 | 92 | 36 | 8 | 424 |
| Leicestershire | 259 | 86 | 41 | 14 | 300 |
| Lincolnshire | 163 | 90 | 19 | 10 | 182 |
| Merseyside | 333 | 95 | 18 | 5 | 351 |
| Metropolitan | 5,747 | 90 | 669 | 10 | 6,416 |
| Norfolk | 241 | 90 | 28 | 10 | 269 |
| North Wales | 317 | 87 | 47 | 13 | 364 |
| North Yorkshire | 42 | 91 | 4 | 9 | 46 |
| Northamptonshire | 192 | 88 | 26 | 12 | 218 |
| Northumbria | 738 | 86 | 125 | 14 | 863 |
| Nottinghamshire | 184 | 91 | 18 | 9 | 202 |
| South Wales | 437 | 88 | 62 | 12 | 499 |
| South Yorkshire | 124 | 91 | 12 | 9 | 136 |
| Staffordshire | 341 | 88 | 46 | 12 | 387 |
| Suffolk | 195 | 86 | 32 | 14 | 227 |
| Surrey | 287 | 89 | 34 | 11 | 321 |
| Sussex | 197 | 92 | 16 | 8 | 213 |
| Thames Valley | 230 | 92 | 21 | 8 | 251 |
| Warwickshire | 95 | 81 | 22 | 19 | 117 |
| West Mercia | 292 | 81 | 68 | 19 | 360 |
| West Midlands | 174 | 89 | 21 | 11 | 195 |
| West Yorkshire | 846 | 91 | 86 | 9 | 932 |
| Wiltshire | 82 | 95 | 4 | 5 | 86 |
| Total | 17,608 | 89 | 2,250 | 11 | 19,858 |

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

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

Table 10: Nature of allegations finalised by investigation in 2019/20

| Allegation groupings | Allegation category | Not subject to special requirements | | Subject to special requirements* | | Total investigated |
|-----------------------------------|---------------------------------------------------------------------------|-------------------------------------|-----------|----------------------------------|-----------|--------------------|
| | | N | % | N | % | N |
| Oppressive behaviour | Serious non-sexual assault | 97 | 63 | 58 | 37 | 155 |
| | Sexual assault | 73 | 82 | 16 | 18 | 89 |
| | Other assault | 2,240 | 85 | 380 | 15 | 2,620 |
| | Oppressive conduct or harassment | 940 | 90 | 101 | 10 | 1,041 |
| | Unlawful/unnecessary arrest or detention | 915 | 89 | 117 | 11 | 1,032 |
| Malpractice | Irregularity in relation to evidence/perjury | 387 | 84 | 72 | 16 | 459 |
| | Corruption or malpractice | 283 | 79 | 76 | 21 | 359 |
| | Mishandling of property | 582 | 91 | 55 | 9 | 637 |
| Breach of PACE | Breach of Code A PACE on stop and search | 160 | 82 | 35 | 18 | 195 |
| | Breach of Code B PACE on searching of premises and seizure of property | 352 | 95 | 19 | 5 | 371 |
| | Breach of Code C PACE on detention, treatment and questioning | 993 | 96 | 42 | 4 | 1,035 |
| | Breach of Code D PACE on identification procedures | 7 | 100 | 0 | 0 | 7 |
| | Breach of Code E PACE on tape recording | 6 | 100 | 0 | 0 | 6 |
| | Unspecified breaches of PACE which cannot be allocated to a specific code | 38 | 86 | 6 | 14 | 44 |
| Lack of fairness and impartiality | Lack of fairness and impartiality | 806 | 94 | 49 | 6 | 855 |
| Discriminatory behaviour | Discriminatory behaviour | 937 | 90 | 108 | 10 | 1,045 |
| Other neglect of duty | Other neglect or Failure in duty | 6,265 | 93 | 497 | 7 | 6,762 |
| Incivility | Incivility, impoliteness and intolerance | 1,775 | 91 | 171 | 9 | 1,946 |
| Traffic | Traffic Irregularity | 117 | 88 | 16 | 12 | 133 |
| Other | Other irregularity in procedure | 1,425 | 92 | 128 | 8 | 1,553 |
| | Improper access and/or disclosure of information | 604 | 87 | 92 | 13 | 696 |
| | Other sexual conduct | 14 | 44 | 18 | 56 | 32 |
| | Other | 483 | 90 | 53 | 10 | 536 |
| Direction and control** | General policing standards | 116 | 100 | | | 116 |
| | Operational management decisions | 28 | 100 | | | 28 |
| | Operational policing policies | 115 | 100 | | | 115 |
| | Organisational decisions | 100 | 100 | | | 100 |
| Total allegations | | 19,858 | 90 | 2,109 | 10 | 21,967 |

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

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

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

Table 10a: Nature of allegations finalised by investigation not subject to special requirements in 2019/20

| Allegation groupings | Allegation category | Not upheld | | Upheld | | Total investigated not subject to special requirements* |
|-----------------------------------|---------------------------------------------------------------------------|---------------|-----------|--------------|-----------|---------------------------------------------------------|
| | | N | % | N | % | N |
| Oppressive behaviour | Serious non-sexual assault | 97 | 100 | 0 | 0 | 97 |
| | Sexual assault | 73 | 100 | 0 | 0 | 73 |
| | Other assault | 2,189 | 98 | 51 | 2 | 2,240 |
| | Oppressive conduct or harassment | 879 | 94 | 61 | 6 | 940 |
| | Unlawful/unnecessary arrest or detention | 850 | 93 | 65 | 7 | 915 |
| Malpractice | Irregularity in relation to evidence/perjury | 363 | 94 | 24 | 6 | 387 |
| | Corruption or malpractice | 269 | 95 | 14 | 5 | 283 |
| | Mishandling of property | 501 | 86 | 81 | 14 | 582 |
| Breach of PACE | Breach of Code A PACE on stop and search | 139 | 87 | 21 | 13 | 160 |
| | Breach of Code B PACE on searching of premises and seizure of property | 307 | 87 | 45 | 13 | 352 |
| | Breach of Code C PACE on detention, treatment and questioning | 908 | 91 | 85 | 9 | 993 |
| | Breach of Code D PACE on identification procedures | 5 | 71 | 2 | 29 | 7 |
| | Breach of Code E PACE on tape recording | 5 | 83 | 1 | 17 | 6 |
| | Unspecified breaches of PACE which cannot be allocated to a specific code | 31 | 82 | 7 | 18 | 38 |
| Lack of fairness and impartiality | Lack of fairness and impartiality | 746 | 93 | 60 | 7 | 806 |
| Discriminatory behaviour | Discriminatory behaviour | 916 | 98 | 21 | 2 | 937 |
| Other neglect of duty | Other neglect or Failure in duty | 5,148 | 82 | 1,117 | 18 | 6,265 |
| Incivility | Incivility, impoliteness and intolerance | 1,561 | 88 | 214 | 12 | 1,775 |
| Traffic | Traffic Irregularity | 98 | 84 | 19 | 16 | 117 |
| Other | Other irregularity in procedure | 1,269 | 89 | 156 | 11 | 1,425 |
| | Improper access and/or disclosure of information | 476 | 79 | 128 | 21 | 604 |
| | Other sexual conduct | 12 | 86 | 2 | 14 | 14 |
| | Other | 446 | 92 | 37 | 8 | 483 |
| Direction and control** | General policing standards | 93 | 80 | 23 | 20 | 116 |
| | Operational management decisions | 26 | 93 | 2 | 7 | 28 |
| | Operational policing policies | 110 | 96 | 5 | 4 | 115 |
| | Organisational decisions | 91 | 91 | 9 | 9 | 100 |
| Total allegations | | 17,608 | 89 | 2,250 | 11 | 19,858 |

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

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

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

Table 11: Time taken to finalise complaint cases in 2019/20

| Police force | Number of complaint cases finalised* | Average number of days to finalise complaint cases (NOT inc. suspension) | Average number of days to finalise complaint cases (inc. suspension) |
|--------------------------|---------------------------------------------|---------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Avon and Somerset | 840 | 70 | 71 |
| Bedfordshire | 391 | 93 | 97 |
| British Transport Police | 278 | 76 | 93 |
| Cambridgeshire | 388 | 89 | 93 |
| Cheshire | 351 | 51 | 61 |
| City of London | 83 | 104 | 121 |
| Cleveland | 274 | 93 | 106 |
| Cumbria | 300 | 53 | 58 |
| Derbyshire | 539 | 100 | 100 |
| Devon and Cornwall | 994 | 111 | 115 |
| Dorset | 484 | 76 | 89 |
| Durham | 276 | 78 | 86 |
| Dyfed-Powys | 297 | 97 | 102 |
| Essex | 619 | 102 | 114 |
| Gloucestershire | 320 | 107 | 128 |
| Greater Manchester | 1,627 | 132 | 133 |
| Gwent | 170 | 88 | 101 |
| Hampshire | 587 | 88 | 93 |
| Hertfordshire | 503 | 94 | 102 |
| Humberside | 1,005 | 97 | 103 |
| Kent | 624 | 102 | 108 |
| Lancashire | 682 | 121 | 128 |
| Leicestershire | 441 | 87 | 92 |
| Lincolnshire | 580 | 86 | 87 |
| Merseyside | 290 | 99 | 117 |
| Metropolitan | 5,261 | 120 | 122 |
| Norfolk | 359 | 93 | 112 |
| North Wales | 298 | 131 | 140 |
| North Yorkshire | 233 | 106 | 108 |
| Northamptonshire | 476 | 86 | 96 |
| Northumbria | 766 | 98 | 103 |
| Nottinghamshire | 1,040 | 91 | 96 |
| South Wales | 1,020 | 109 | 113 |
| South Yorkshire | 594 | 102 | 112 |
| Staffordshire | 384 | 77 | 84 |
| Suffolk | 286 | 100 | 122 |
| Surrey | 383 | 69 | 73 |
| Sussex | 834 | 80 | 87 |
| Thames Valley | 1,410 | 78 | 89 |
| Warwickshire | 234 | 101 | 115 |
| West Mercia | 513 | 111 | 118 |
| West Midlands | 389 | 118 | 129 |
| West Yorkshire | 1,398 | 87 | 98 |
| Wiltshire | 398 | 121 | 124 |
| Total | 29,219 | 100 | 107 |

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

Table 12: Appeals completed and upheld in 2019/20 by appeal body and appeal type

| Appeal type | IOPC appeals | | | Chief officer appeals | | |
|------------------|-------------------------|---------------|----------|-------------------------|---------------|----------|
| | Number valid completed* | Number upheld | % upheld | Number valid completed* | Number upheld | % upheld |
| Non-recording** | 1,305 | 524 | 40 | | | |
| Local resolution | 79 | 39 | 49 | 2,715 | 422 | 16 |
| Investigation | 1,245 | 419 | 34 | 487 | 72 | 15 |
| Disapplication | 83 | 8 | 10 | 302 | 38 | 13 |
| Discontinuance | 9 | 2 | 22 | 9 | 1 | 11 |

* Some appeals may be deemed 'invalid' (i.e. there was no right of appeal) and these have been excluded from the number of 'valid completed' and the calculation for '% upheld'. In addition, one appeal completed by chief officers in 2019/20 was recorded on police force systems without a decision. Therefore, this appeal is not included in upheld and valid completed counts.

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

Table 13: Appeals received and completed by chief officers in 2015/16 to 2019/20

| Chief officer local resolution appeals | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 |
|---------------------------------------------------|----------------|----------------|----------------|----------------|----------------|
| Received | 1,806 | 2,251 | 2,278 | 2,697 | 2,731 |
| Valid completed | 1,509 | 1,948 | 2,068 | 2,416 | 2,715 |
| Upheld | 256 | 328 | 321 | 379 | 422 |
| % Upheld | 17 | 17 | 16 | 16 | 16 |

| Chief officer investigation appeals | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 |
|------------------------------------------------|----------------|----------------|----------------|----------------|----------------|
| Received | 1,521 | 1,204 | 922 | 695 | 482 |
| Valid completed | 1,356 | 1,103 | 1,039 | 673 | 487 |
| Upheld | 260 | 196 | 167 | 84 | 72 |
| % Upheld | 19 | 18 | 16 | 12 | 15 |

| Chief officer disapplication appeals | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 |
|-------------------------------------------------|----------------|----------------|----------------|----------------|----------------|
| Received | 402 | 404 | 365 | 406 | 288 |
| Valid completed | 392 | 351 | 344 | 387 | 302 |
| Upheld | 34 | 30 | 26 | 36 | 38 |
| % Upheld | 9 | 9 | 8 | 9 | 13 |

| Chief officer discontinuance appeals | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 |
|-------------------------------------------------|----------------|----------------|----------------|----------------|----------------|
| Received | 7 | 5 | 13 | 10 | 11 |
| Valid completed | 6 | 4 | 12 | 10 | 9 |
| Upheld | 2 | 2 | 0 | 4 | 1 |
| % Upheld | 33 | 50 | 0 | 40 | 11 |

| Total chief officer appeals | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 |
|------------------------------------|----------------|----------------|----------------|----------------|----------------|
| Received | 3,736 | 3,864 | 3,578 | 3,808 | 3,512 |
| Valid completed | 3,263 | 3,406 | 3,463 | 3,486 | 3,513 |
| Upheld | 552 | 556 | 514 | 503 | 533 |
| % Upheld | 17 | 16 | 15 | 14 | 15 |

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

Some appeals may be deemed 'invalid' and these have been excluded from the number of 'valid completed' and the calculation for '% upheld'. In addition, one appeal completed by chief officers in 2019/20 was recorded on police force systems without a decision. Therefore, this appeal is not included in upheld and valid completed counts.

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

Table 14: Appeals received by chief officers in 2019/20

| Police force | Chief officer local resolution appeals | | Chief officer investigation appeals | | Chief officer disapplication appeals | | Chief officer discontinuance appeals | | Total chief officer appeals |
|--------------------------|----------------------------------------|-----------|-------------------------------------|-----------|--------------------------------------|----------|--------------------------------------|----------|-----------------------------|
| | N | % | N | % | N | % | N | % | N |
| Avon and Somerset | 109 | 73 | 17 | 11 | 23 | 15 | 0 | 0 | 149 |
| Bedfordshire | 34 | 100 | 0 | 0 | 0 | 0 | 0 | 0 | 34 |
| British Transport Police | 0 | 0 | 34 | 100 | 0 | 0 | 0 | 0 | 34 |
| Cambridgeshire | 39 | 95 | 0 | 0 | 2 | 5 | 0 | 0 | 41 |
| Cheshire | 36 | 69 | 15 | 29 | 1 | 2 | 0 | 0 | 52 |
| City of London | 6 | 43 | 7 | 50 | 1 | 7 | 0 | 0 | 14 |
| Cleveland | 44 | 85 | 7 | 13 | 1 | 2 | 0 | 0 | 52 |
| Cumbria | 42 | 91 | 1 | 2 | 3 | 7 | 0 | 0 | 46 |
| Derbyshire | 30 | 86 | 2 | 6 | 2 | 6 | 1 | 3 | 35 |
| Devon and Cornwall | 109 | 73 | 28 | 19 | 11 | 7 | 1 | 1 | 149 |
| Dorset | 43 | 81 | 3 | 6 | 7 | 13 | 0 | 0 | 53 |
| Durham | 31 | 69 | 9 | 20 | 5 | 11 | 0 | 0 | 45 |
| Dyfed-Powys | 50 | 85 | 2 | 3 | 7 | 12 | 0 | 0 | 59 |
| Essex | 46 | 84 | 4 | 7 | 3 | 5 | 2 | 4 | 55 |
| Gloucestershire | 27 | 93 | 1 | 3 | 1 | 3 | 0 | 0 | 29 |
| Greater Manchester | 192 | 95 | 2 | 1 | 9 | 4 | 0 | 0 | 203 |
| Gwent | 2 | 11 | 16 | 89 | 0 | 0 | 0 | 0 | 18 |
| Hampshire | 71 | 83 | 3 | 3 | 11 | 13 | 1 | 1 | 86 |
| Hertfordshire | 54 | 93 | 0 | 0 | 4 | 7 | 0 | 0 | 58 |
| Humberside | 62 | 93 | 2 | 3 | 3 | 4 | 0 | 0 | 67 |
| Kent | 66 | 75 | 2 | 2 | 20 | 23 | 0 | 0 | 88 |
| Lancashire | 73 | 89 | 0 | 0 | 9 | 11 | 0 | 0 | 82 |
| Leicestershire | 46 | 87 | 0 | 0 | 7 | 13 | 0 | 0 | 53 |
| Lincolnshire | 55 | 93 | 0 | 0 | 4 | 7 | 0 | 0 | 59 |
| Merseyside | 66 | 79 | 8 | 10 | 10 | 12 | 0 | 0 | 84 |
| Metropolitan | 264 | 76 | 59 | 17 | 22 | 6 | 2 | 1 | 347 |
| Norfolk | 43 | 84 | 5 | 10 | 3 | 6 | 0 | 0 | 51 |
| North Wales | 27 | 64 | 13 | 31 | 2 | 5 | 0 | 0 | 42 |
| North Yorkshire | 43 | 81 | 3 | 6 | 7 | 13 | 0 | 0 | 53 |
| Northamptonshire | 70 | 91 | 0 | 0 | 7 | 9 | 0 | 0 | 77 |
| Northumbria | 40 | 38 | 51 | 49 | 12 | 12 | 1 | 1 | 104 |
| Nottinghamshire | 107 | 97 | 1 | 1 | 1 | 1 | 1 | 1 | 110 |
| South Wales | 31 | 29 | 62 | 58 | 13 | 12 | 0 | 0 | 106 |
| South Yorkshire | 65 | 79 | 2 | 2 | 14 | 17 | 1 | 1 | 82 |
| Staffordshire | 57 | 64 | 31 | 35 | 1 | 1 | 0 | 0 | 89 |
| Suffolk | 23 | 85 | 1 | 4 | 3 | 11 | 0 | 0 | 27 |
| Surrey | 63 | 88 | 8 | 11 | 1 | 1 | 0 | 0 | 72 |
| Sussex | 100 | 79 | 5 | 4 | 21 | 17 | 0 | 0 | 126 |
| Thames Valley | 159 | 87 | 15 | 8 | 9 | 5 | 0 | 0 | 183 |
| Warwickshire | 7 | 27 | 12 | 46 | 7 | 27 | 0 | 0 | 26 |
| West Mercia | 7 | 13 | 35 | 66 | 10 | 19 | 1 | 2 | 53 |
| West Midlands | 70 | 80 | 13 | 15 | 5 | 6 | 0 | 0 | 88 |
| West Yorkshire | 188 | 96 | 2 | 1 | 6 | 3 | 0 | 0 | 196 |
| Wiltshire | 34 | 97 | 1 | 3 | 0 | 0 | 0 | 0 | 35 |
| Total | 2,731 | 78 | 482 | 14 | 288 | 8 | 11 | 0 | 3,512 |

'Chief officers' refers to the heads of police forces (chief constables for all forces except the Metropolitan Police and City of London Police, which are each headed by a Commissioner). Under changes to the handling of appeals introduced by the Police Reform and Social Responsibility Act 2011, both chief officers and the IOPC consider appeals.

From January 2016, the British Transport Police consider appeals. Before this date all appeals relating to this force were considered by the IPCC (now the IOPC).

Table 15: Outcome of appeals completed by chief officers in 2019/20 (continues on next page)

| Police force | Chief officer local resolution appeals | | | Chief officer investigation appeals | | | Chief officer disapplication appeals | | |
|--------------------------|----------------------------------------|------------|-----------|-------------------------------------|-----------|-----------|--------------------------------------|-----------|-----------|
| | Valid completed | Upheld | Upheld | Valid completed | Upheld | Upheld | Valid completed | Upheld | Upheld |
| | N | N | % | N | N | % | N | N | % |
| Avon and Somerset | 103 | 14 | 14 | 16 | 2 | 13 | 22 | 2 | 9 |
| Bedfordshire | 29 | 2 | 7 | 0 | 0 | - | 0 | 0 | - |
| British Transport Police | 1 | 1 | 100 | 28 | 6 | 21 | 0 | 0 | - |
| Cambridgeshire | 27 | 0 | 0 | 0 | 0 | - | 1 | 0 | 0 |
| Cheshire | 33 | 6 | 18 | 15 | 2 | 13 | 1 | 0 | 0 |
| City of London | 3 | 0 | 0 | 2 | 0 | 0 | 1 | 0 | 0 |
| Cleveland | 39 | 8 | 21 | 4 | 1 | 25 | 1 | 0 | 0 |
| Cumbria | 37 | 5 | 14 | 2 | 0 | 0 | 3 | 1 | 33 |
| Derbyshire | 32 | 2 | 6 | 8 | 0 | 0 | 0 | 0 | - |
| Devon and Cornwall | 96 | 20 | 21 | 24 | 4 | 17 | 12 | 1 | 8 |
| Dorset | 41 | 3 | 7 | 5 | 1 | 20 | 8 | 0 | 0 |
| Durham | 17 | 0 | 0 | 9 | 0 | 0 | 6 | 2 | 33 |
| Dyfed-Powys | 52 | 9 | 17 | 2 | 0 | 0 | 4 | 1 | 25 |
| Essex | 42 | 9 | 21 | 4 | 2 | 50 | 1 | 0 | 0 |
| Gloucestershire | 27 | 9 | 33 | 1 | 0 | 0 | 1 | 0 | 0 |
| Greater Manchester | 232 | 31 | 13 | 3 | 1 | 33 | 9 | 0 | 0 |
| Gwent | 3 | 2 | 67 | 21 | 4 | 19 | 1 | 0 | 0 |
| Hampshire | 70 | 1 | 1 | 4 | 0 | 0 | 15 | 0 | 0 |
| Hertfordshire | 45 | 5 | 11 | 0 | 0 | - | 4 | 0 | 0 |
| Humberside | 62 | 8 | 13 | 2 | 0 | 0 | 4 | 1 | 25 |
| Kent | 64 | 17 | 27 | 1 | 0 | 0 | 16 | 9 | 56 |
| Lancashire | 122 | 10 | 8 | 0 | 0 | - | 9 | 0 | 0 |
| Leicestershire | 40 | 2 | 5 | 0 | 0 | - | 7 | 0 | 0 |
| Lincolnshire | 51 | 7 | 14 | 0 | 0 | - | 4 | 1 | 25 |
| Merseyside | 58 | 9 | 16 | 10 | 3 | 30 | 11 | 0 | 0 |
| Metropolitan | 241 | 78 | 32 | 49 | 10 | 20 | 34 | 6 | 18 |
| Norfolk | 43 | 12 | 28 | 5 | 0 | 0 | 3 | 0 | 0 |
| North Wales | 30 | 6 | 20 | 11 | 3 | 27 | 2 | 1 | 50 |
| North Yorkshire | 50 | 5 | 10 | 3 | 0 | 0 | 8 | 1 | 13 |
| Northamptonshire | 67 | 5 | 7 | 0 | 0 | - | 6 | 0 | 0 |
| Northumbria | 27 | 7 | 26 | 47 | 11 | 23 | 14 | 0 | 0 |
| Nottinghamshire | 88 | 16 | 18 | 1 | 0 | 0 | 1 | 0 | 0 |
| South Wales | 30 | 12 | 40 | 58 | 9 | 16 | 13 | 1 | 8 |
| South Yorkshire | 62 | 2 | 3 | 2 | 0 | 0 | 14 | 0 | 0 |
| Staffordshire | 57 | 6 | 11 | 30 | 4 | 13 | 2 | 0 | 0 |
| Suffolk | 22 | 1 | 5 | 3 | 0 | 0 | 3 | 1 | 33 |
| Surrey | 66 | 4 | 6 | 11 | 0 | 0 | 1 | 0 | 0 |
| Sussex | 99 | 16 | 16 | 5 | 1 | 20 | 25 | 3 | 12 |
| Thames Valley | 161 | 12 | 7 | 19 | 1 | 5 | 9 | 1 | 11 |
| Warwickshire | 7 | 4 | 57 | 17 | 2 | 12 | 6 | 2 | 33 |
| West Mercia | 9 | 2 | 22 | 43 | 4 | 9 | 7 | 3 | 43 |
| West Midlands | 110 | 29 | 26 | 20 | 1 | 5 | 11 | 1 | 9 |
| West Yorkshire | 190 | 19 | 10 | 2 | 0 | 0 | 2 | 0 | 0 |
| Wiltshire | 30 | 6 | 20 | 0 | 0 | - | 0 | 0 | - |
| Total | 2,715 | 422 | 16 | 487 | 72 | 15 | 302 | 38 | 13 |

Please note, one appeal completed in 2019/20 was recorded on police force system without a decision. Therefore, this appeal is not included in upheld and valid completed counts..

Table 15: Outcome of appeals completed by chief officers in 2019/20 (continued)

| Police force | Chief officer discontinuance appeals | | | Total chief officer appeals | | |
|--------------------------|--------------------------------------|----------|-----------|-----------------------------|------------|-----------|
| | Valid completed | Upheld | Upheld | Valid completed | Upheld | Upheld |
| | N | N | % | N | N | % |
| Avon and Somerset | 0 | 0 | - | 141 | 18 | 13 |
| Bedfordshire | 0 | 0 | - | 29 | 2 | 7 |
| British Transport Police | 0 | 0 | - | 29 | 7 | 24 |
| Cambridgeshire | 0 | 0 | - | 28 | 0 | 0 |
| Cheshire | 0 | 0 | - | 49 | 8 | 16 |
| City of London | 0 | 0 | - | 6 | 0 | 0 |
| Cleveland | 0 | 0 | - | 44 | 9 | 20 |
| Cumbria | 0 | 0 | - | 42 | 6 | 14 |
| Derbyshire | 1 | 1 | 100 | 41 | 3 | 7 |
| Devon and Cornwall | 2 | 0 | 0 | 134 | 25 | 19 |
| Dorset | 0 | 0 | - | 54 | 4 | 7 |
| Durham | 0 | 0 | - | 32 | 2 | 6 |
| Dyfed-Powys | 0 | 0 | - | 58 | 10 | 17 |
| Essex | 1 | 0 | 0 | 48 | 11 | 23 |
| Gloucestershire | 0 | 0 | - | 29 | 9 | 31 |
| Greater Manchester | 0 | 0 | - | 244 | 32 | 13 |
| Gwent | 0 | 0 | - | 25 | 6 | 24 |
| Hampshire | 1 | 0 | 0 | 90 | 1 | 1 |
| Hertfordshire | 0 | 0 | - | 49 | 5 | 10 |
| Humberside | 0 | 0 | - | 68 | 9 | 13 |
| Kent | 0 | 0 | - | 81 | 26 | 32 |
| Lancashire | 0 | 0 | - | 131 | 10 | 8 |
| Leicestershire | 0 | 0 | - | 47 | 2 | 4 |
| Lincolnshire | 0 | 0 | - | 55 | 8 | 15 |
| Merseyside | 0 | 0 | - | 79 | 12 | 15 |
| Metropolitan | 1 | 0 | 0 | 325 | 94 | 29 |
| Norfolk | 0 | 0 | - | 51 | 12 | 24 |
| North Wales | 0 | 0 | - | 43 | 10 | 23 |
| North Yorkshire | 0 | 0 | - | 61 | 6 | 10 |
| Northamptonshire | 0 | 0 | - | 73 | 5 | 7 |
| Northumbria | 1 | 0 | 0 | 89 | 18 | 20 |
| Nottinghamshire | 0 | 0 | - | 90 | 16 | 18 |
| South Wales | 0 | 0 | - | 101 | 22 | 22 |
| South Yorkshire | 1 | 0 | 0 | 79 | 2 | 3 |
| Staffordshire | 0 | 0 | - | 89 | 10 | 11 |
| Suffolk | 0 | 0 | - | 28 | 2 | 7 |
| Surrey | 0 | 0 | - | 78 | 4 | 5 |
| Sussex | 0 | 0 | - | 129 | 20 | 16 |
| Thames Valley | 0 | 0 | - | 189 | 14 | 7 |
| Warwickshire | 0 | 0 | - | 30 | 8 | 27 |
| West Mercia | 1 | 0 | 0 | 60 | 9 | 15 |
| West Midlands | 0 | 0 | - | 141 | 31 | 22 |
| West Yorkshire | 0 | 0 | - | 194 | 19 | 10 |
| Wiltshire | 0 | 0 | - | 30 | 6 | 20 |
| Total | 9 | 1 | 11 | 3,513 | 533 | 15 |

Please note, one appeal completed in 2019/20 was recorded on police force systems without a decision. Therefore, this appeal is not included in upheld and valid completed counts.

Table 16: Appeals received and completed by the IOPC 2015/16 to 2019/20

| IOPC non-recording appeals | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 |
|--------------------------------------|----------------|----------------|----------------|----------------|----------------|
| Received | 1,529 | 1,693 | 1,554 | 1,416 | 1,423 |
| Valid completed | 1,188 | 1,497 | 1,445 | 1,236 | 1,305 |
| Upheld | 473 | 549 | 524 | 447 | 524 |
| % Upheld | 40 | 37 | 36 | 36 | 40 |
| IOPC local resolution appeals | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 |
| Received | 76 | 82 | 37 | 78 | 76 |
| Valid completed | 43 | 69 | 38 | 70 | 79 |
| Upheld | 35 | 52 | 24 | 47 | 39 |
| % Upheld | 81 | 75 | 63 | 67 | 49 |
| IOPC investigation appeals | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 |
| Received | 1,950 | 1,790 | 1,654 | 1,292 | 1,261 |
| Valid completed | 1,669 | 1,721 | 1,703 | 1,310 | 1,245 |
| Upheld | 687 | 694 | 643 | 492 | 419 |
| % Upheld | 41 | 40 | 38 | 38 | 34 |
| IOPC disapplication appeals | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 |
| Received | 116 | 128 | 117 | 69 | 92 |
| Valid completed | 96 | 130 | 101 | 59 | 83 |
| Upheld | 24 | 20 | 11 | 11 | 8 |
| % Upheld | 25 | 15 | 11 | 19 | 10 |
| IOPC discontinuance appeals | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 |
| Received | 10 | 7 | 3 | 6 | 6 |
| Valid completed | 3 | 6 | 3 | 2 | 9 |
| Upheld | 0 | 0 | 0 | 0 | 2 |
| % Upheld | 0 | 0 | 0 | 0 | 22 |
| Total IOPC appeals | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 |
| Received | 3,681 | 3,700 | 3,365 | 2,861 | 2,858 |
| Valid completed | 2,999 | 3,423 | 3,290 | 2,677 | 2,721 |
| Upheld | 1,219 | 1,315 | 1,202 | 997 | 992 |
| % Upheld | 41 | 38 | 37 | 37 | 36 |

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

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

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

Table 17: Appeals received by the IOPC in 2019/20

| Police force | IOPC non-recording appeals | | IOPC local resolution appeals | | IOPC investigation appeals | | IOPC disapplication appeals | | IOPC discontinuance appeals | | Total IOPC appeals |
|--------------------------|----------------------------|-----------|-------------------------------|----------|----------------------------|-----------|-----------------------------|----------|-----------------------------|----------|--------------------|
| | N | % | N | % | N | % | N | % | N | % | N |
| Avon and Somerset | 20 | 67 | 0 | 0 | 10 | 33 | 0 | 0 | 0 | 0 | 30 |
| Bedfordshire | 15 | 23 | 2 | 3 | 48 | 73 | 1 | 2 | 0 | 0 | 66 |
| British Transport Police | 8 | 42 | 0 | 0 | 11 | 58 | 0 | 0 | 0 | 0 | 19 |
| Cambridgeshire | 11 | 27 | 2 | 5 | 25 | 61 | 3 | 7 | 0 | 0 | 41 |
| Cheshire | 23 | 82 | 0 | 0 | 5 | 18 | 0 | 0 | 0 | 0 | 28 |
| City of London | 17 | 100 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 17 |
| Cleveland | 9 | 75 | 0 | 0 | 3 | 25 | 0 | 0 | 0 | 0 | 12 |
| Cumbria | 17 | 81 | 0 | 0 | 4 | 19 | 0 | 0 | 0 | 0 | 21 |
| Derbyshire | 22 | 50 | 0 | 0 | 22 | 50 | 0 | 0 | 0 | 0 | 44 |
| Devon and Cornwall | 49 | 82 | 1 | 2 | 10 | 17 | 0 | 0 | 0 | 0 | 60 |
| Dorset | 7 | 33 | 1 | 5 | 12 | 57 | 0 | 0 | 1 | 5 | 21 |
| Durham | 15 | 38 | 0 | 0 | 24 | 60 | 1 | 3 | 0 | 0 | 40 |
| Dyfed-Powys | 24 | 63 | 0 | 0 | 14 | 37 | 0 | 0 | 0 | 0 | 38 |
| Essex | 26 | 45 | 0 | 0 | 32 | 55 | 0 | 0 | 0 | 0 | 58 |
| Gloucestershire | 17 | 89 | 0 | 0 | 2 | 11 | 0 | 0 | 0 | 0 | 19 |
| Greater Manchester | 35 | 43 | 2 | 2 | 42 | 51 | 3 | 4 | 0 | 0 | 82 |
| Gwent | 14 | 74 | 0 | 0 | 5 | 26 | 0 | 0 | 0 | 0 | 19 |
| Hampshire | 36 | 67 | 3 | 6 | 14 | 26 | 1 | 2 | 0 | 0 | 54 |
| Hertfordshire | 27 | 38 | 3 | 4 | 37 | 51 | 5 | 7 | 0 | 0 | 72 |
| Humberside | 49 | 71 | 3 | 4 | 16 | 23 | 1 | 1 | 0 | 0 | 69 |
| Kent | 70 | 59 | 2 | 2 | 46 | 39 | 1 | 1 | 0 | 0 | 119 |
| Lancashire | 20 | 40 | 0 | 0 | 29 | 58 | 1 | 2 | 0 | 0 | 50 |
| Leicestershire | 14 | 35 | 0 | 0 | 22 | 55 | 4 | 10 | 0 | 0 | 40 |
| Lincolnshire | 11 | 55 | 0 | 0 | 9 | 45 | 0 | 0 | 0 | 0 | 20 |
| Merseyside | 13 | 35 | 3 | 8 | 21 | 57 | 0 | 0 | 0 | 0 | 37 |
| Metropolitan | 189 | 27 | 14 | 2 | 439 | 64 | 48 | 7 | 0 | 0 | 690 |
| Norfolk | 41 | 53 | 5 | 6 | 28 | 36 | 3 | 4 | 0 | 0 | 77 |
| North Wales | 20 | 36 | 5 | 9 | 30 | 55 | 0 | 0 | 0 | 0 | 55 |
| North Yorkshire | 10 | 83 | 0 | 0 | 2 | 17 | 0 | 0 | 0 | 0 | 12 |
| Northamptonshire | 14 | 61 | 2 | 9 | 7 | 30 | 0 | 0 | 0 | 0 | 23 |
| Northumbria | 74 | 56 | 3 | 2 | 51 | 39 | 3 | 2 | 1 | 1 | 132 |
| Nottinghamshire | 24 | 41 | 7 | 12 | 27 | 47 | 0 | 0 | 0 | 0 | 58 |
| South Wales | 11 | 34 | 1 | 3 | 16 | 50 | 2 | 6 | 2 | 6 | 32 |
| South Yorkshire | 31 | 67 | 1 | 2 | 13 | 28 | 1 | 2 | 0 | 0 | 46 |
| Staffordshire | 20 | 71 | 0 | 0 | 4 | 14 | 4 | 14 | 0 | 0 | 28 |
| Suffolk | 19 | 56 | 1 | 3 | 12 | 35 | 2 | 6 | 0 | 0 | 34 |
| Surrey | 12 | 35 | 6 | 18 | 14 | 41 | 2 | 6 | 0 | 0 | 34 |
| Sussex | 5 | 42 | 1 | 8 | 6 | 50 | 0 | 0 | 0 | 0 | 12 |
| Thames Valley | 27 | 71 | 0 | 0 | 11 | 29 | 0 | 0 | 0 | 0 | 38 |
| Warwickshire | 8 | 73 | 0 | 0 | 3 | 27 | 0 | 0 | 0 | 0 | 11 |
| West Mercia | 237 | 94 | 0 | 0 | 14 | 6 | 0 | 0 | 0 | 0 | 251 |
| West Midlands | 58 | 92 | 1 | 2 | 4 | 6 | 0 | 0 | 0 | 0 | 63 |
| West Yorkshire | 39 | 26 | 5 | 3 | 101 | 68 | 4 | 3 | 0 | 0 | 149 |
| Wiltshire | 15 | 41 | 2 | 5 | 16 | 43 | 2 | 5 | 2 | 5 | 37 |
| Total | 1,423 | 50 | 76 | 3 | 1,261 | 44 | 92 | 3 | 6 | 0 | 2,858 |

Table 18: Outcome of appeals completed by the IOPC in 2019/20 (continues on next page)

| Police force | IOPC non-recording appeals | | | IOPC local resolution appeals | | | IOPC investigation appeals | | |
|--------------------------|----------------------------|------------|-----------|-------------------------------|-----------|-----------|----------------------------|------------|-----------|
| | Valid completed | Upheld | Upheld | Valid completed | Upheld | Upheld | Valid completed | Upheld | Upheld |
| | N | N | % | N | N | % | N | N | % |
| Avon and Somerset | 20 | 6 | 30 | 0 | 0 | - | 6 | 1 | 17 |
| Bedfordshire | 15 | 2 | 13 | 2 | 2 | 100 | 44 | 14 | 32 |
| British Transport Police | 6 | 1 | 17 | 0 | 0 | - | 13 | 3 | 23 |
| Cambridgeshire | 12 | 4 | 33 | 2 | 1 | 50 | 23 | 5 | 22 |
| Cheshire | 27 | 6 | 22 | 0 | 0 | - | 8 | 2 | 25 |
| City of London | 16 | 5 | 31 | 0 | 0 | - | 0 | 0 | - |
| Cleveland | 8 | 1 | 13 | 0 | 0 | - | 4 | 2 | 50 |
| Cumbria | 16 | 6 | 38 | 0 | 0 | - | 4 | 3 | 75 |
| Derbyshire | 21 | 7 | 33 | 0 | 0 | - | 20 | 7 | 35 |
| Devon and Cornwall | 45 | 11 | 24 | 1 | 1 | 100 | 12 | 2 | 17 |
| Dorset | 6 | 3 | 50 | 2 | 2 | 100 | 8 | 3 | 38 |
| Durham | 14 | 3 | 21 | 0 | 0 | - | 25 | 9 | 36 |
| Dyfed-Powys | 20 | 4 | 20 | 0 | 0 | - | 15 | 1 | 7 |
| Essex | 25 | 13 | 52 | 0 | 0 | - | 34 | 12 | 35 |
| Gloucestershire | 18 | 7 | 39 | 0 | 0 | - | 2 | 1 | 50 |
| Greater Manchester | 40 | 12 | 30 | 1 | 1 | 100 | 46 | 19 | 41 |
| Gwent | 11 | 7 | 64 | 0 | 0 | - | 3 | 0 | 0 |
| Hampshire | 30 | 14 | 47 | 3 | 1 | 33 | 13 | 3 | 23 |
| Hertfordshire | 24 | 10 | 42 | 3 | 2 | 67 | 40 | 13 | 33 |
| Humberside | 56 | 16 | 29 | 3 | 0 | 0 | 18 | 9 | 50 |
| Kent | 65 | 29 | 45 | 3 | 1 | 33 | 43 | 18 | 42 |
| Lancashire | 20 | 7 | 35 | 0 | 0 | - | 32 | 10 | 31 |
| Leicestershire | 16 | 2 | 13 | 0 | 0 | - | 18 | 2 | 11 |
| Lincolnshire | 11 | 5 | 45 | 0 | 0 | - | 9 | 1 | 11 |
| Merseyside | 11 | 8 | 73 | 3 | 3 | 100 | 22 | 10 | 45 |
| Metropolitan | 186 | 56 | 30 | 17 | 5 | 29 | 436 | 146 | 33 |
| Norfolk | 39 | 14 | 36 | 4 | 3 | 75 | 22 | 7 | 32 |
| North Wales | 19 | 4 | 21 | 5 | 2 | 40 | 30 | 10 | 33 |
| North Yorkshire | 12 | 2 | 17 | 0 | 0 | - | 2 | 1 | 50 |
| Northamptonshire | 13 | 7 | 54 | 2 | 0 | 0 | 11 | 1 | 9 |
| Northumbria | 65 | 18 | 28 | 3 | 1 | 33 | 46 | 15 | 33 |
| Nottinghamshire | 21 | 15 | 71 | 9 | 7 | 78 | 25 | 10 | 40 |
| South Wales | 13 | 7 | 54 | 0 | 0 | - | 15 | 4 | 27 |
| South Yorkshire | 28 | 13 | 46 | 1 | 1 | 100 | 12 | 5 | 42 |
| Staffordshire | 22 | 9 | 41 | 0 | 0 | - | 5 | 1 | 20 |
| Suffolk | 21 | 6 | 29 | 0 | 0 | - | 11 | 4 | 36 |
| Surrey | 14 | 9 | 64 | 6 | 2 | 33 | 12 | 3 | 25 |
| Sussex | 4 | 1 | 25 | 1 | 1 | 100 | 5 | 2 | 40 |
| Thames Valley | 25 | 6 | 24 | 0 | 0 | - | 10 | 4 | 40 |
| Warwickshire | 13 | 5 | 38 | 0 | 0 | - | 4 | 0 | 0 |
| West Mercia | 145 | 107 | 74 | 0 | 0 | - | 14 | 10 | 71 |
| West Midlands | 56 | 36 | 64 | 1 | 1 | 100 | 5 | 1 | 20 |
| West Yorkshire | 42 | 11 | 26 | 5 | 2 | 40 | 103 | 41 | 40 |
| Wiltshire | 14 | 9 | 64 | 2 | 0 | 0 | 15 | 4 | 27 |
| Total | 1,305 | 524 | 40 | 79 | 39 | 49 | 1,245 | 419 | 34 |

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

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

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

Table 18: Outcome of appeals completed by the IOPC in 2019/20 (continued)

| Police force | IOPC disapplication appeals | | | IOPC discontinuance appeals | | | Total IOPC appeals | | |
|--------------------------|-----------------------------|----------|-----------|-----------------------------|----------|-----------|--------------------|------------|-----------|
| | Valid completed | Upheld | Upheld | Valid completed | Upheld | Upheld | Valid completed | Upheld | Upheld |
| | N | N | % | N | N | % | N | N | % |
| Avon and Somerset | 0 | 0 | - | 0 | 0 | - | 26 | 7 | 27 |
| Bedfordshire | 1 | 0 | 0 | 0 | 0 | - | 62 | 18 | 29 |
| British Transport Police | 0 | 0 | - | 0 | 0 | - | 19 | 4 | 21 |
| Cambridgeshire | 3 | 0 | 0 | 0 | 0 | - | 40 | 10 | 25 |
| Cheshire | 0 | 0 | - | 0 | 0 | - | 35 | 8 | 23 |
| City of London | 0 | 0 | - | 0 | 0 | - | 16 | 5 | 31 |
| Cleveland | 0 | 0 | - | 0 | 0 | - | 12 | 3 | 25 |
| Cumbria | 0 | 0 | - | 0 | 0 | - | 20 | 9 | 45 |
| Derbyshire | 0 | 0 | - | 0 | 0 | - | 41 | 14 | 34 |
| Devon and Cornwall | 0 | 0 | - | 0 | 0 | - | 58 | 14 | 24 |
| Dorset | 0 | 0 | - | 1 | 0 | 0 | 17 | 8 | 47 |
| Durham | 1 | 0 | 0 | 0 | 0 | - | 40 | 12 | 30 |
| Dyfed-Powys | 0 | 0 | - | 0 | 0 | - | 35 | 5 | 14 |
| Essex | 0 | 0 | - | 0 | 0 | - | 59 | 25 | 42 |
| Gloucestershire | 0 | 0 | - | 0 | 0 | - | 20 | 8 | 40 |
| Greater Manchester | 2 | 0 | 0 | 0 | 0 | - | 89 | 32 | 36 |
| Gwent | 0 | 0 | - | 0 | 0 | - | 14 | 7 | 50 |
| Hampshire | 1 | 0 | 0 | 0 | 0 | - | 47 | 18 | 38 |
| Hertfordshire | 4 | 0 | 0 | 1 | 0 | 0 | 72 | 25 | 35 |
| Humberside | 1 | 0 | 0 | 0 | 0 | - | 78 | 25 | 32 |
| Kent | 1 | 1 | 100 | 0 | 0 | - | 112 | 49 | 44 |
| Lancashire | 0 | 0 | - | 0 | 0 | - | 52 | 17 | 33 |
| Leicestershire | 4 | 1 | 25 | 0 | 0 | - | 38 | 5 | 13 |
| Lincolnshire | 0 | 0 | - | 0 | 0 | - | 20 | 6 | 30 |
| Merseyside | 0 | 0 | - | 0 | 0 | - | 36 | 21 | 58 |
| Metropolitan | 46 | 6 | 13 | 0 | 0 | - | 685 | 213 | 31 |
| Norfolk | 3 | 0 | 0 | 0 | 0 | - | 68 | 24 | 35 |
| North Wales | 0 | 0 | - | 0 | 0 | - | 54 | 16 | 30 |
| North Yorkshire | 0 | 0 | - | 0 | 0 | - | 14 | 3 | 21 |
| Northamptonshire | 0 | 0 | - | 0 | 0 | - | 26 | 8 | 31 |
| Northumbria | 1 | 0 | 0 | 1 | 0 | 0 | 116 | 34 | 29 |
| Nottinghamshire | 0 | 0 | - | 0 | 0 | - | 55 | 32 | 58 |
| South Wales | 1 | 0 | 0 | 2 | 2 | 100 | 31 | 13 | 42 |
| South Yorkshire | 1 | 0 | 0 | 0 | 0 | - | 42 | 19 | 45 |
| Staffordshire | 1 | 0 | 0 | 0 | 0 | - | 28 | 10 | 36 |
| Suffolk | 2 | 0 | 0 | 0 | 0 | - | 34 | 10 | 29 |
| Surrey | 3 | 0 | 0 | 0 | 0 | - | 35 | 14 | 40 |
| Sussex | 0 | 0 | - | 0 | 0 | - | 10 | 4 | 40 |
| Thames Valley | 0 | 0 | - | 0 | 0 | - | 35 | 10 | 29 |
| Warwickshire | 0 | 0 | - | 0 | 0 | - | 17 | 5 | 29 |
| West Mercia | 2 | 0 | 0 | 0 | 0 | - | 161 | 117 | 73 |
| West Midlands | 0 | 0 | - | 0 | 0 | - | 62 | 38 | 61 |
| West Yorkshire | 3 | 0 | 0 | 1 | 0 | 0 | 154 | 54 | 35 |
| Wiltshire | 2 | 0 | 0 | 3 | 0 | 0 | 36 | 13 | 36 |
| Total | 83 | 8 | 10 | 9 | 2 | 22 | 2,721 | 992 | 36 |

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

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

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

Table 19: Gender of complainants 2019/20

| Gender | 2018/19 | | 2019/20 | |
|-------------------|---------------|------------|---------------|------------|
| | N | % | N | % |
| Female | 11,749 | 39 | 10,763 | 39 |
| Male | 17,577 | 58 | 15,851 | 57 |
| Other | 95 | 0 | 85 | 0 |
| Prefer not to say | 0 | 0 | 0 | 0 |
| Unknown | 791 | 3 | 915 | 3 |
| Total | 30,212 | 100 | 27,614 | 100 |

Table 20: Ethnicity of complainants 2019/20

| Ethnicity | 2018/19 | | 2019/20 | |
|--------------|---------------|------------|---------------|------------|
| | N | % | N | % |
| White | 13,451 | 45 | 11,881 | 43 |
| Black | 1,255 | 4 | 1,157 | 4 |
| Asian | 1,365 | 5 | 1,267 | 5 |
| Other | 715 | 2 | 736 | 3 |
| Not stated | 12,287 | 41 | 11,146 | 40 |
| Unknown | 1,139 | 4 | 1,427 | 5 |
| Total | 30,212 | 100 | 27,614 | 100 |

Table 21: Age of complainants 2019/20

| Age group | 2018/19 | | 2019/20 | |
|--------------|---------------|------------|---------------|------------|
| | N | % | N | % |
| 17 & below | 247 | 1 | 236 | 1 |
| 18-29 | 3,957 | 13 | 3,614 | 13 |
| 30-39 | 5,699 | 19 | 5,520 | 20 |
| 40-49 | 5,678 | 19 | 5,325 | 19 |
| 50-59 | 4,992 | 17 | 4,679 | 17 |
| 60+ | 2,938 | 10 | 2,779 | 10 |
| Unknown | 6,701 | 22 | 5,461 | 20 |
| Total | 30,212 | 100 | 27,614 | 100 |

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

Tables 19 to 21: Complainants are only counted once in these tables regardless of how many complaints they have made throughout the year.

Table 22: Status of those subject to a complaint 2019/20

| Status | 2018/19 | | 2019/20 | |
|----------------------------------------|---------------|------------|---------------|------------|
| | N | % | N | % |
| Police officer ranks | 29,842 | 87 | 28,677 | 87 |
| Police staff including traffic wardens | 3,208 | 9 | 3,060 | 9 |
| Community support officers | 822 | 2 | 704 | 2 |
| Contracted staff | 121 | 0 | 148 | 0 |
| Special constables | 378 | 1 | 328 | 1 |
| Total | 34,371 | 100 | 32,917 | 100 |

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

Table 23: Gender of those subject to a complaint 2019/20

| Gender | 2018/19 | | 2019/20 | |
|--------------|---------------|------------|---------------|------------|
| | N | % | N | % |
| Female | 9,979 | 29 | 9,789 | 30 |
| Male | 23,965 | 70 | 22,732 | 69 |
| Other | 12 | 0 | 16 | 0 |
| Unknown | 225 | 1 | 212 | 1 |
| Total | 34,181 | 100 | 32,749 | 100 |

Table 24: Ethnicity of those subject to complaint 2019/20

| Ethnicity | 2018/19 | | 2019/20 | |
|--------------|---------------|------------|---------------|------------|
| | N | % | N | % |
| White | 27,916 | 82 | 26,127 | 80 |
| Black | 556 | 2 | 567 | 2 |
| Asian | 1,026 | 3 | 1,069 | 3 |
| Other | 667 | 2 | 654 | 2 |
| Not stated | 878 | 3 | 860 | 3 |
| Unknown | 3,138 | 9 | 3,472 | 11 |
| Total | 34,181 | 100 | 32,749 | 100 |

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

3

Annex A: glossary of terms

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

Direction and control: The IOPC considers the term ‘direction and control’ to mean general decisions about how a police force is run, as opposed to the day-to-day decisions or actions of people serving with the police.

Allegation: An allegation may concern the conduct of a person or persons serving with the police or the direction and control of a police force. It is made by someone defined as a complainant under the *Police Reform Act 2002* (see ‘complainant’ below). An allegation may be made by one or more complainants. A complaint case may contain one or many allegations. For example, a person may allege that they were pushed by an officer and that the officer was rude to them. This would be recorded as two separate allegations forming one complaint case. An allegation is recorded against an allegation category³.

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

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

- Local investigations: carried out entirely by the police. Complainants have a right of appeal to the relevant appeal body following a local investigation⁴.

³ A full list of the allegation categories for the 2012 complaints regime and their definitions can be found in the IOPC’s Guidance on the recording of complaints under the *Police Reform Act 2002*: www.policeconduct.gov.uk/research-and-learning/statistics/complaints-statistics

⁴ The test to determine who should deal with an appeal is set out in section 13 of our Statutory Guidance (2015) www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance ‘Chief of Police’ is a collective term that refers to the heads of police forces (this means chief constables for all forces except the Metropolitan Police Service and the City of London Police, which are each headed by a commissioner).

- Supervised investigations: carried out by the police under their own direction and control. The IOPC sets out what the investigation should look at (which is referred to as the investigation's 'terms of reference') and will receive the investigation report when it is complete. Complainants have a right of appeal to the IOPC following a supervised investigation.
- if the complaint is vexatious, oppressive or otherwise an abuse of the procedures for dealing with complaints
- if it is not reasonably practicable to complete the investigation or any other procedures under the *Police Reform Act 2002*.

Withdrawn: A complainant may decide to withdraw one or more allegations in their complaint or they may wish no further action to be taken in relation to their allegation/complaint. This results in the allegation being recorded as withdrawn and may mean no further action being taken.

Disapplication: Disapplication applies only to allegations linked to complaint cases received on or after 22 November 2012.

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

- if more than 12 months have passed between the incident, or the latest incident, giving rise to the complaint and the making of the complaint and either no good reason for the delay has been shown or injustice would be likely to be caused by the delay
- if the matter is already subject of a complaint made by or on behalf of the same complainant
- if the complainant discloses neither their name and address nor that of any other interested person and it is not reasonably practicable to ascertain these
- if the complaint is repetitious

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

Discontinuance: A discontinuance ends an ongoing investigation into a complaint. It can occur only if one or more of the following circumstances apply:

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

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

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

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

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

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

There are a number of factors police forces should consider when deciding whether it is appropriate to suspend an investigation into a complaint⁵. They must notify the complainant in writing when the investigation or other procedure into their complaint is suspended and provide an explanation for the decision. A complainant has the right to ask the IOPC to review that decision.

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

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

Investigation appeal: This applies to all complaints investigated by the police force itself or where the investigation has been supervised by the IOPC. The complainant may appeal to the relevant appeal body on a number of grounds in relation to the investigation. There is no right of appeal in relation to the investigation of a complaint about a force’s direction and control.

⁵ Information about the considerations that should be made when deciding whether to suspend an investigation or other procedures into a complaint can be found in section 9 of our Statutory Guidance (2015) www.policeconduct.gov.uk/complaints-and-appeals/statutory-guidance

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

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

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

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

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

- if the appeal is not complete. An appeal must be in writing and contain certain information, such as the details of the complaint, the name of the police force that has made the decision is the subject of the appeal and the grounds of appeal. The relevant appeal body may still consider

an appeal even if it does not consider the appeal complete

- if there is no right of appeal. Only a complainant or someone acting on their behalf can make an appeal. If anyone else tries to, the appeal is invalid. An appeal must also follow the final decision of a police force in relation to a complaint (or, in the case of non-recording where no decision has been made, at least 15 working days must have passed between the complainant making their complaint and submitting an appeal against the non-recording of that complaint)
- if the appeal is made more than 28 days after the date of the letter from the police force notifying the complainant about the decision (which can be appealed) and there are no special circumstances to justify the delay

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

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

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

the written permission of the complainant to act on their behalf

A person is 'adversely affected' if they:

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

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

A 'witness' is defined as:

- someone who gained their knowledge of that conduct in a way that would make them a competent witness capable of giving admissible evidence of that conduct in criminal proceedings
- someone who has anything in their possession or control that would be admissible evidence in criminal proceedings

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

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

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

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

To find out more about our work or to request this report in an alternative format, you can contact us in a number of ways:

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Rydym yn croesawu galwadau ffôn yn y Gymraeg

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Glossary – Allegation types (pre and post 1st Feb 2020 following changes to Police Conduct Regulations)

| Old Allegation Types (pre Feb 2020) | | |
|--------------------------------------------|------------------------------------|------------------------------------------|
| Organisational/Direction and Control | 01 | Operational policing policies |
| | 02 | Organisational decisions |
| | 03 | General policing standards |
| | 04 | Operational management decisions |
| Individual | A | Serious non-sexual assault |
| | B | Sexual assault |
| | C | Other assault |
| | D | Oppressive conduct or harassment |
| | E | Unlawful/unnecessary arrest or detention |
| | F | Discriminatory Behaviour |
| | G | Irregularity in evidence/perjury |
| | H | Corrupt practice |
| | J | Mishandling of property |
| | K | Breach Code A PACE |
| | L | Breach Code B PACE |
| | M | Breach Code C PACE |
| | N | Breach Code D PACE |
| | P | Breach Code E PACE |
| | Q | Lack of fairness and impartiality |
| | R | Multiple or unspecified breaches of PACE |
| | S | Other neglect or failure in duty |
| | T | Other irregularity in procedure |
| | U | Incivility, impoliteness and intolerance |
| | V | Traffic irregularity |
| W | Other | |
| X | Improper disclosure of information | |
| Y | Other sexual conduct | |

CITY OF LONDON POLICE: OFFICIAL

| New Allegation Types (post Feb 2020) | | |
|---------------------------------------------|--------------------|---------------------------------------------------------------------------------------|
| Type Group | Type | Type Description |
| 1 | A1 | Police action following contact |
| | A2 | Decisions |
| | A3 | Information |
| | A4 | General level of service |
| 2 | B1 | Stops, and stop and search |
| | B2 | Searches of premises and seizure of property |
| | B3 | Power to arrest and detain |
| | B4 | Use of force |
| | B5 | Detention in police custody |
| | B6 | Bail, identification and interview procedures |
| | B7 | Evidential procedures |
| | B8 | Out of court disposals |
| | B9 | Other policies and procedures |
| 3 | C1 | Handling of or damage to property/premises |
| 4 | D1 | Use of police systems |
| | D2 | Disclosure of information |
| | D3 | Handling of information |
| | D4 | Accessing and handling of information from other sources |
| 5 | E1 | Use of police vehicles |
| 6 | F1 | Age |
| | F10 | Other |
| | F2 | Disability |
| | F3 | Gender reassignment |
| | F4 | Pregnancy and maternity |
| | F5 | Marriage and civil partnership |
| | F6 | Race |
| | F7 | Religion or belief |
| | F8 | Sex |
| F9 | Sexual Orientation | |
| 7 | G1 | Organisational corruption |
| | G2 | Abuse of position for sexual purpose |
| | G3 | Abuse of position for the purpose of pursuing an inappropriate emotional relationship |
| | G4 | Abuse of position for financial purpose |
| | G5 | Obstruction of justice |
| | G6 | Abuse of position for other purpose |
| 8 | H1 | Impolite language/tone |
| | H2 | Impolite and intolerant actions |
| | H3 | Unprofessional attitude and disrespect |
| | H4 | Lack of fairness and impartiality |
| | H5 | Overbearing or harassing behaviours |
| 9 | J1 | Sexual assault |
| | J2 | Sexual harassment |
| | J3 | Other sexual conduct |
| 10 | K1 | Discreditable conduct |
| 11 | L1 | Other |

Annex A: glossary of terms

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

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

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

- a member of the public who claims that the conduct took place in relation to them
- a member of the public who claims they have been 'adversely affected' by the conduct, even though it did not take place in relation to them
- a member of the public who claims to have witnessed the conduct
- a person acting on behalf of someone who falls within any of the three categories above. This person would be classed as an 'agent' or 'representative' and must have the written permission of the complainant to act on their behalf. A person is 'adversely affected' if they suffer distress or inconvenience, loss or damage, or are put in danger or at risk by the conduct complained of. This might apply, for example, to other people present at the incident, or to the parent of a child or young person, or a

friend of the person directly affected. It does not include someone distressed by watching an incident on television.

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

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

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

- Police officers of any rank
- Police staff, including community support officers and traffic wardens
- Special Constables

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

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

Direction and control: The IOPC considers the term 'direction and control' to mean general decisions about how a force is run, as opposed to the day-to-day decisions or actions of persons serving with the police, which affect individual members of the public – including those that affect more than one individual.

Disapplication: Disapplication only applies to allegations linked to complaint cases received on or after 22 November 2012.

A full list of the allegation categories available and their definitions can be found in the IOPC's Guidance on the recording of complaints. There are certain circumstances in which a complaint that has been recorded by a police force does not have to be dealt with under the Police Reform Act 2002 (PRA 2002). For allegations linked to complaint cases received on or after 22 November 2012, this is called disapplication. It can only happen if certain circumstances apply:

- If more than 12 months have passed between the incident, or the latest incident, giving rise to the complaint and the making of the complaint and either no good reason for the delay has been shown or injustice would be likely to be caused by the delay.
- If the matter is already subject of a complaint made by or on behalf of the same complainant.
- If the complainant discloses neither their name and address nor that of any other interested person and it is not reasonably practicable to ascertain these.
- If the complaint is repetitious.
- If the complaint is vexatious, oppressive or otherwise an abuse of the procedures for dealing with complaints.
- If it is not reasonably practicable to complete the investigation or any other procedures under the PRA 2002.

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

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

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

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

If the complaint was not required to be referred to the IOPC, the police force can discontinue a local investigation; otherwise, they must apply to the IOPC for permission to discontinue the investigation. In the case of a supervised investigation, the police force has to apply to the IOPC for permission to discontinue the investigation.

Discontinuance appeal: An appeal may be made to the relevant appeal body against the decision by a police force to discontinue the investigation into a complaint. There is no right of appeal where the complaint subject of the investigation discontinued relates to direction and control, where the IOPC has given permission for the discontinuance or if the discontinuance is carried out by the IOPC in relation to a supervised investigation.

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

- If the appeal is not complete. An appeal must be in writing and contain certain information such as the details of the complaint, the name of the police force whose decision is subject of the appeal and the grounds of appeal, although the relevant appeal body may still consider an appeal even if it does not consider the appeal complete.
- If there is no right of appeal. Only a complainant or someone acting on his or her behalf can make an appeal. If anyone else tries to, the appeal is invalid. An appeal must also follow a final decision in relation to a complaint from the force (or, in the case of non-recording where no decision has been made, at least 15 working days must have passed between the complainant making their complaint and submitting an appeal against the non-recording of that complaint).
- If the appeal is made more than 28 days after the date of the letter from the Police force giving notification of the decision (which is capable of appeal) to the complainant and there are no special circumstances to justify the delay. The right of appeal in relation to direction and control complaints is limited, as noted in the definition for each appeal type above; full details can be found in the IOPC's Statutory guidance.

Dispensation: Dispensation only applies to allegations linked to complaint cases received before 22 November 2012.

There are certain circumstances in which a complaint that has been recorded by a police force does not have to be dealt under the Police Reform Act 2002 (PRA 2002). For allegations linked to complaint cases received before 22 November 2012, this is called dispensation. It can only happen if certain circumstances apply:

- If more than 12 months have passed between the incident, or the latest

incident, giving rise to the complaint and the making of the complaint and either no good reason for the delay has been shown or injustice would be likely to be caused by the delay.

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

Gross Misconduct: A breach of the Standards of Professional Behaviour so serious that dismissal would be justified

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

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

to the IOPC following a supervised investigation.

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

Investigation outcomes:

- **Unsubstantiated / Substantiated:** These are the outcomes of allegations that have been judged solely in terms of whether evidence of misconduct was found. This outcome will only apply to allegations linked to complaint cases recorded before 1 April 2010. As time progresses there will be fewer allegations with these outcomes.

- **Not upheld / Upheld:** As of 1 April 2010, police forces are expected to also record whether a complaint is upheld or not upheld. A complaint will be upheld if the service or conduct complained about does not reach the standard a reasonable person could expect. This means that the outcome is not solely linked to proving misconduct.

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

Local Resolution appeal: Complainants are entitled to appeal to the relevant appeal body against the outcome of a local resolution.

There is no right of appeal where the complaint locally resolved relates to direction and control.

Management Action: A way to deal with issues of misconduct other than by formal action. They can include improvement plans agreed with officers involved.

Misconduct: A breach of the Standards of Professional Behaviour

Misconduct Hearing: A type of formal misconduct proceeding for cases where there is a case to answer in respect of gross misconduct or where the police officer has a live final written warning and there is a case to answer in the case of a further act of misconduct. The maximum outcome at a Misconduct Hearing would be dismissal from the Police Service.

Misconduct Meeting: A type of formal misconduct proceeding for cases where there is a case to answer in respect of misconduct, and where the maximum outcome would be a final written warning.

Non-recording appeal: Under the Police Reform Act 2002, the police have a duty to record all complaints about the conduct of a serving member of the police or the direction and control of a police force.

Complainants have the right to appeal to the IOPC in relation to the non-recording of their complaint on a number of grounds. These are set out in the 'findings' section of the report. The appeal right in relation to direction and control complaints is limited; full details can be found in the IOPC's Statutory Guidance.

Sub judice: After recording a complaint, the investigation or other procedure for dealing with the complaint may be suspended because the matter is considered to be sub judice. This is when continuing the investigation / other procedure would

prejudice a criminal investigation or criminal Proceedings. There are a number of factors Police forces should consider when deciding whether a suspension is appropriate. The complainant must be notified in writing when the investigation / other procedure into their complaint is suspended and provided with an explanation for the decision. A complainant has the right to ask the IOPC to review that decision.

Unsatisfactory Performance Procedures

(UPP): Procedures which are available to deal with performance and attendance issues.

They are not, as such, dealt with by Professional Standards, but by the Force's Human Resources Department.

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

Police Terminology

AA: Appropriate Authority

ANPR: Automatic Number Plate Recognition

ATOC: (Association of Train Operating Companies) agreements.

To be authorised to travel within the ATOC agreement warranted officers must sign to join the scheme and an agreed amount is taken from their wages at source. When they begin working at CoLP officers are provided with a warrant card which previously permitted travel on the over ground trains within a specific region in the south east of the UK. As long as the warrant card did not have the words 'Not for Travel' across it officers were considered to be in the ATOC agreement. This has since changed and officers now receive a Rail Travel card to be shown alongside their warrant card to confirm they are in the agreement.

Other forces have similar schemes including Essex Police who issues their officers in the

agreement with a travel card. This has to be shown with a warrant card. With both CoLP and Essex Police when officers leave the force they are required to hand back both their warrant and travel cards. If they are transferring forces and required to travel by train the expectation would be that they would buy a train ticket on their first day before their new warrant card and now travel card are issued.

BWV: Body Worn Video

CAD: Computer Aided Dispatch

CCJ: County Court Judgement

DPS: Directorate Professional Standards (Metropolitan Police Service)

DSI: Death or Serious Injury

ECD: Economic Crime Directorate

FI: Financial Investigator

HCP: Health Care Professionals

I&I: Intelligence and Information Directorate

IOPC: Independent Office of Police Conduct

MIT: Major Investigation Team

MPS: Metropolitan Police Service

NFA: No Further Action

NUT: National Union of Teachers

PCO: Public Carriage Office

PHV: Private Hire Vehicle

PMS: Property Management System

PNC: Police National Computer

POCA: Proceeds of Crime Act

SAR: Subject Access Request

SAR: Suspicious Activity Report

SIO: Senior Investigating Officer

SOP: Standard Operating Procedure

STOT: Safer Transport Operations Team

TFG: Tactical Firearms Group

TfL: Transport for London

TPH: Taxi and Private Hire

UNIFI: City of London Crime and Intelligence
Database

UPD: Unformed Policing Directorate

IC Codes:

IC1 – White – North European

IC2 – Dark European

IC3 – Black

IC4 – (South) Asian

IC5 – Chinese, Japanese, or other South-East
Asian

IC6 – Arabic or North African

IC9 – Unknown

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