



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

Date: THURSDAY, 6 MAY 2021

Time: 10.00 am

Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

Members:

Caroline Addy (Chair)	Mary Durcan
Deborah Oliver (Deputy Chairman)	Alderman Emma Edhem
Douglas Barrow	Helen Fentimen
Nicholas Bensted-Smith	Michael Mitchell
Tijs Broeke	Deputy James Thomson

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Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:
<https://youtu.be/H8lApCbm47c>

This meeting will be a virtual meeting and therefore will not take place in a physical location. 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 5th February 2021.

For Decision
(Pages 5 - 12)

4. **REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 13 - 16)

5. **STOP AND SEARCH AND USE OF FORCE UPDATE SUMMARY- END OF YEAR 2020-21**

Report of the Commissioner of the City of London Police.

For Information
(Pages 17 - 22)

6. **EQUALITY AND INCLUSION HIGHLIGHT REPORT**

Report of the Commissioner of the City of London Police.

For Information
(Pages 23 - 38)

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

Report of the Commissioner of the City of London Police.

For Information
(Pages 39 - 54)

8. **GLOSSARY TERMS**

For Information
(Pages 55 - 62)

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

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

11. **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

12. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 5th February 2021.

For Decision
(Pages 63 - 66)

13. **NON-PUBLIC REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 67 - 68)

14. **CHIS ACT - PRESENTATION**

Oral presentation of the Assistant Commissioner.

For Information

15. **ACTION FRAUD STATISTICS – QUARTER 4 – 1ST JAN 2021 – 31ST MARCH 2021**

Report of the Commissioner of the City of London Police.

For Information
(Pages 69 - 76)

16. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 4 – 1ST JAN 2021 – 31ST MARCH 2021**

Report of the Commissioner of the City of London Police.

For Information
(Pages 77 - 94)

17. **PROFESSIONAL STANDARDS DIRECTORATE CASES**

Report of the Commissioner of the City of London Police.

For Information
(Pages 95 - 98)

- a) Cases assessed as not conduct or performance issue - no case to answer /not upheld (Pages 99 - 106)
- b) Cases dealt with under Complaint and Conduct Regulations 2019 (Pages 107 - 118)

18. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

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

**PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE OF THE CITY OF
LONDON POLICE AUTHORITY BOARD
Friday, 5 February 2021**

Minutes of the meeting of the Professional Standards and Integrity Committee of the City of London Police Authority Board held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Friday, 5 February 2021 at 10.00 am

Present

Members:

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

Officers:

Oliver Bolton	- Town Clerk's Department
Alistair Sutherland	- City of London Police
Gary Brailsford-Hart	- City of London Police
Simon Latham	- Town Clerk's Department
Stuart Phoenix	- City of London Police
Angela Rogers	- City of London Police
Sanjay Andersen	- City of London Police
John Cater	- Town Clerk's Department
Polly Dunn	- Town Clerk's Department
Claire Cresswell	- City of London Police
Rebecca Caldicott	- City of London Police
Rachael Waldron	- City of London Police
James Morgan	- City of London Police
Ian Younger	- City of London Police

1. APOLOGIES

Apologies were received from Nicholas Bensted-Smith and James Tumbridge

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

There were no declarations.

3. MINUTES

RESOLVED - that the public minutes of the meeting held on 26 November 2020 be approved.

4. REFERENCES

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

2/2020/P – 2 March 2020 - Item 5 Integrity Dashboard and Code of Ethics Update

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

- Officers informed Members that whilst a Report had been submitted recently to the Police's Performance Management Group, the number of responses this quarter – 14, had been significantly lower than the longer term quarterly average; therefore, it would be difficult to glean as great an insight as usual. The Chair asked officers to circulate the current information and asked them to submit a (hopefully) fuller quarterly Report for the next meeting of the Committee in May.

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.

- The Chair updated Members on the current progress concerning recruitment; she noted that advertising for the role would be going live that day (i.e. 05/02/21); this included, one paid advert, a link posted to several social networks, and an item on the Police's website. In addition, Members were encouraged to cascade the advert through their own networks. The deadline for candidates to express their interest had been set for late February, with interview panels provisionally set up to take place soon after. The panel includes the Chair, Deputy James Thomson, and Rachael Waldron of the Police Authority Team.

13/2020/P - 26 November 2020 Item 8 – Use of Algorithms and AI across the City of London Police

Members 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.

- The Chair encouraged officers to move ahead at pace, with the aim to hold the session before next Committee meeting (05/05/21)

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.

- The Chair informed Members that, whilst she had received an updated version of the document, it was still in draft form. She pointed out that it would be more helpful for Members to review the final version; officers responded that the final document was almost ready, and it would include responses to the recommendations (relevant to the Police) from the Corporation's Tackling Racism Taskforce. Officers are in regular contact with Tijs Broeke who is providing Member liaison on this.

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.

- The Chair encouraged officers to move ahead at pace, with the aim to hold the session before next Committee meeting (05/05/21)

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 informed Members that, after discussions, there was now an acceptance that any indemnity required by panel Members will be provided by the Corporation. The Chamberlain was expected to sign this off formally very soon. Officers added that the change of wording (to cover the indemnity) was agreed at a national level, until such a time that the regulations can be changed by the Home Office.

5. ANNUAL REVIEW OF TERMS OF REFERENCE

The Committee considered a Report of the Town Clerk concerning the Committee's Terms of Reference.

Whilst the current Terms of Reference was approved without any changes, there was a discussion concerning the Committees responsibilities via-a-vis paragraph G (i.e. "Overseeing measures to promote equality, inclusion and engagement by the Force"), when it came to embedding the recommendations of the Tackling Racism Taskforce. All were of the view that it was first appropriate to have a discussion about the (Police relevant) TRT recommendations at the next Police Authority Board meeting in March, and to review any resulting actions at the next meeting of the Committee in May.

RESOLVED – that the Committee:

- considered (and approved) the proposed change in membership of the Committee namely, that **two** external co-opted Members, can now be appointed by the Police Authority Board;
- approved the terms of reference of the Committee (as set out in appendix 1 of the Report) for submission to the City of London Police Authority Board for final approval; and
- considered whether any change is required to the Committee's frequency of meetings (meeting frequency maintained at once-a-quarter)

6. **12 MONTH REVIEW OF THE COMPLAINT REVIEW PROCESS**

The Committee received a Report of the Commissioner of the City of London Police concerning the Complaint Review Process.

The Chair thanked Members and officers for their participation and hard work in ensuring the success of the process over the past 12 months.

When it came to Member involvement on the panels, the Chair asked officers to establish a rota system to ensure that, going forward, the workload was spread out more equitably.

In the interests of maintaining scrutiny, it was suggested that, after each panel meeting, officers provide an update to each of the participating panel Members that would outline the actions resulting from any recommendations proposed. This could take the form of an email circular, and, in the event that further actions or follow up is needed, a more formal discussion can then take place at the next Panel meeting.

Separately, officers confirmed that future iterations of the Report's appendix (which outlines details about Panel decisions and recommendations) include the initials of the participating panel Members; this would hopefully make things easier to reference when it came to Members and officers reviewing decisions after the panel meeting took place.

RESOLVED – that the Committee noted the Report.

7. **ACTION FRAUD AND NATIONAL FRAUD INTELLIGENCE BUREAU (NFIB) COMPLAINTS**

The Committee received a Report of the Commissioner of the City of London Police concerning Action Fraud and NFIB complaints.

RESOLVED – that the Committee noted the Report.

8. **OFFICERS ON TEMPORARY AND ACTING PROMOTION**

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

The Assistant Commissioner stressed that he expected that the total number of officers acting up would reduce over the coming months. The Economic Crime

Department (ECD) accounted for the highest proportion of officers in a temporary or acting role, this reflected the increased workload for ECD over the past six months; the Assistant Commissioner expected that this number would stabilise as the changes for the ECD became embedded over the coming year.

Noting that there were a number of acronyms in the document which were not immediately clear to the lay person, the Chair asked that, going forward, a glossary of acronyms and an organogram be provided as a standing item at each meeting of the Committee for Members' reference (as happens at Police Authority Board meetings).

The Chair asked that the next Report on this issue includes details about those individuals who have retired whilst serving at a higher temporary or acting rank.

Separately, the Assistant Commissioner confirmed that Members of the Independent Advisory and Scrutiny Group (IASG) were now involved in promotion panels for all ranks.

RESOLVED – that the Committee noted the Report.

9. **COVID-19 FIXED PENALTY NOTICES (FPNS) AND STOP AND SEARCH UPDATE**

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

In response to a query, officers confirmed that the Stop and Search data was publicly available and was regularly shared with relevant community groups.

In response to a query concerning Covid-19 related Fixed Penalty Notices (FPNs), officers explained that, under the legislation, constables had the power to direct someone in breach of the regulation to disperse and could, if appropriate, fine them. The regulations apply to all forces in England and Wales. Whilst, in the interests of transparency and accountability, offences are recorded, officers are encouraged to display judgement and discretion around issuing FPNS when faced with potentially more minor breaches.

Members agreed with the Chair's proposal that, going forward, the Committee should receive Reports concerning Stop and Search data twice a year, as opposed to the current frequency of each meeting, with the proviso that if any significant change occurs Members are alerted to it in good time. The Chair asked that a senior officer take responsibility for issuing these alerts should they be required.

Members agreed with the Chair that, until the Covid restrictions are removed, FPN data should continue to be shared with the Committee at each of its meetings.

In response to a query on the Force collaborating more with the Corporation on communications around Covid compliance/enforcement and Covid related fraud, officers reassured Members that a great deal of collaborative work was

taking place, and this was producing good outcomes. They remained open to further suggestions and would reach out to the Chairman of the Police Authority Board after the meeting to discuss further.

RESOLVED – that the Committee noted the Report.

10. **AVENUES OF APPEAL**

The Committee received a Report of the Commissioner of the City of London Police concerning Avenues of Appeal.

Officers confirmed that they would circulate a link to the IOPC Statutory Guidance referred to in the Report for Members' reference after the meeting.

RESOLVED – that the Committee noted the Report.

11. **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 confirmed that City of London Police led Ethics, Integrity & Standards Panel Review session had been scheduled for 18th February – an invitation will be circulated shortly to Members of the Committee to attend the meeting.

RESOLVED – that the Committee noted the Report.

12. **POLICE INTEGRITY DEVELOPMENT AND DELIVERY PLAN REPORT 2020-21 - JANUARY 2021 UPDATE**

The Committee received a Report of the Commissioner of the City of London Police concerning the Police Integrity Development and Delivery Plan.

RESOLVED – that the Committee noted the Report.

13. **INDEPENDENT OFFICE FOR POLICE CONDUCT - POLICE COMPLAINTS STATISTICS FOR ENGLAND AND WALES 2019/20**

The Committee received the IOPC Report concerning police complaints statistics for England and Wales in 2019/20.

RESOLVED – that the Committee noted the Report.

14. **GLOSSARY - ALLEGATION TYPES (PRE AND POST 1ST FEB 2020 FOLLOWING CHANGES TO POLICE CONDUCT REGULATIONS)**

The Committee received a Report for information which provided a glossary of allegation types (pre and post 1st Feb 2020 following changes to Police Conduct Regulations)

RESOLVED – that the Committee noted the Report.

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

There were no questions.

16. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT

There were two items of urgent business:

i) On behalf of Members and officers, the Chair of the Police Authority Board and the Assistant Commissioner, noting that this was the Chair's final meeting, expressed their sincere and fulsome thanks to Alderman Gowman for her rigorous commitment to ensuring the Committee's effectiveness during her tenure. The excellent quality of the work and scrutiny of the Committee helped to underpin and legitimise the public's support and trust for the Police in the City, and the Chair would be much missed.

ii) Noting that this would be her final meeting, the Chair thanked D/Supt Angie Rogers for her vital contributions to the work of the Committee. D/Supt Rogers had played a significant role in helping to improve the effectiveness of the Committee in recent years, and, on behalf of the Committee, the Chair wished her the very best for the future.

17. 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.

18. NON-PUBLIC MINUTES

RESOLVED - that the non-public minutes of the meeting held on 26 November 2020 be approved.

19. NON-PUBLIC REFERENCES

Members received a joint report of the Town Clerk and Commissioner regarding non-public references.

20. ACTION FRAUD/NFIB PRESENTATION

The Committee received a presentation of the Commissioner of the City of London Police concerning the National Fraud & Cybercrime Reporting Centre.

21. NATIONAL FRAUD INTELLIGENCE BUREAU (NFIB)- FULFILMENT LETTERS

The Committee received a Report of the Commissioner of the City of London Police concerning NFIB Fulfilment Letters.

22. ACTION FRAUD STATISTICS – QUARTER 3 – 1ST OCTOBER 2020 - 31ST DECEMBER 2020

The Committee received a Report of the Commissioner of the City of London Police concerning Action Fraud Statistics for Quarter 3 (1st Oct 2020 – 31st Dec 2020).

23. PROFESSIONAL STANDARDS STATISTICS – QUARTER 3 –1ST OCT 2020 – 31ST DEC 2021

The Committee received a Report concerning the Professional Standards Statistics for Quarter 3 (1st Oct 2020 – 31st Dec 2021).

24. PROFESSIONAL STANDARDS DIRECTORATE CASES

The Committee received a Report of the Commissioner of the City of London Police providing a sample of recent Professional Standards Directorate cases

24.1 Cases assessed as not conduct or performance issue - no case to answer / not upheld

Members considered cases with no case to answer/not upheld.

24.2 Local Resolution

Members considered cases dealt with by local resolutions.

24.3 Cases dealt with under Complaint and Conduct Regulations 2019

Members considered cases dealt with under Complaint and Conduct Regulations 2019.

25. NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

There were no non-public questions.

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

There was no other non-public Business.

The meeting ended at 11.50 am

Chair

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
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 (Feb 2021 update) Whilst a Report had been submitted recently to the Police's Performance Management Group, the number of responses this quarter – 14, had been significantly lower than the longer term quarterly average; therefore, it would be difficult to glean as great an insight as usual. The Chair asked officers to submit a (hopefully) fuller quarterly Report for the next meeting of the Committee in May.	Head of Professional Standards	IN PROGRESS Due May 2021 (although dependent on when quarterly results are finalised in May)

PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE
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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
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 April 2021
14/2020/P	26 November 2020 Item 9 – Equality and Inclusion Strategy Update	February 2021 - The Chair informed Members that, whilst she had received an updated version of the Equality and Inclusion Action Plan , it was still in draft form. She pointed out that it would be more helpful for Members to review the final version; officers responded that the final document was almost ready, and it would include responses to the recommendations (relevant to the Police) from the Corporation's Tackling Racism Taskforce. Officers are in regular contact with Tijs Broeke who is providing Member liaison on this.	Head of Strategic Development	IN PROGRESS Due May 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

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PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

CITY OF LONDON POLICE: SUITABLE FOR PUBLICATION - RECIPIENT ONLY

		<i>Feb 2021 update: The Chair encouraged officers to move ahead at pace, with the aim to hold the session before next Committee meeting (05/05/21)</i>		
1/2021/P	5 February 2021 Item 5 - Annual Review of Terms of Reference	Whilst the current Terms of Reference was approved without any changes, there was a discussion concerning the Committees responsibilities via-a-vis paragraph G (i.e. "Overseeing measures to promote equality, inclusion and engagement by the Force"), when it came to embedding the recommendations of the Tackling Racism Taskforce. All were of the view that it was first appropriate to have a discussion about the (Police relevant) TRT recommendations at the next Police Authority Board meeting in March, and to review any resulting actions at the next meeting of the Committee in May.	Force/Town Clerks	IN PROGRESS Due May 2021

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Committee(s): Police: Professional Standards and Integrity Committee	Dated: 6 th May 2021
Subject: Stop and Search and Use of Force update summary- End of Year 2020-21	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	No 1- people are safe and feel safe
Does this proposal require extra revenue and/or capital spending?	N/A
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: Commissioner of Police Pol xx-21	For Information
Report author: James Morgan, Superintendent Operations, Uniform Policing Directorate	

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. Reports have been submitted quarterly to your September, November 2020 and February 2021 PSI Committee. A summary of Q3 data was submitted to the February 2021 meeting, with the full data to be made available to Members via the City of London Police Website. This is still a work in progress owing to a resourcing issue within the Performance Information Unit. The plan is to add the full Q3 and End of Year data and analysis to the website at the same time.

As noted at your last Committee meeting, quarterly Stop and Search and Use of Force reporting schedule is dependent upon the Home Office data extract. The data extract follows a nationally mandated timeline and requires considerable analytical resource to complete. Until the data extract has been finalised, there is not sufficient capacity and capability within the Performance Information Unit to complete the quarterly Stop and Search and Use of Force reports. On the current schedule, your PSI Committee meetings occur too close to the date of the data extract to enable the analysts to complete both the data extract and full report in advance of your meetings. We have discussed with the Police Authority Board team whether or not the date of your Committee meeting could be moved to later in the month to allow sufficient time for the full report to be completed and circulated in advance of your meetings and they confirmed that this would be feasible when new dates are set for 2022.

However, as with Q3, a summary (infographic) report of the End of Year 2020-21 Stop and Search and Use of Force data is attached to this paper. A link to the full Q3 and End of Year data and analysis report on the City of London Police Website, will be circulated to Members as soon as it is published.

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 and a Summary report for Q3.

Current Position

2. As outlined in the Summary, owing to a timing issue, there is no full End of Year report and analysis, as at the time of submission, the Performance Information Unit is working to the Home Office data extraction deadlines and the data for Q4 is still being fully collated and analysed. The Force Stop and Search Working Group is meeting in mid-May to assure, consider and scrutinise this data. However, a summary infographic is presented at Appendix 1 of the Stop and Search and Use of Force data and a link from the Force website to the full End of Year 2020-21 data or the full report will be circulated to Members as soon as the full report is published.
3. Based on the year-end summary data for Stop and Search there is no substantive change in the overall position from that reported to your February 2021 meeting. Positive outcomes at year end remain the same as at Q2: 38%. This remains one of the highest nationally. Members will also recall that in a recent review by HMICFRS found that in 92% of the records examined CoLPs grounds for Stop and Search were reasonable. Although the disproportionality index is reliant on the analysis of the full report, there have been no changes between Q2 data and the year-end data in subject self-defined ethnicity.
4. The end of year Use of Force data paints a similarly consistent picture to the Stop and Search data. Handcuffing remains the most frequently used form of Force (77%, slightly higher than the national average of 70%¹), and the proportion of subjects perceived (by the reporting officer) to have been suffering from some form of mental health conditions remains broadly consistent (17% at year end; 19% in Q2). Male subjects continue to account for the vast majority (81% at year end) of subjects who force has been used against, and the self-defined ethnicity remains broadly consistent between the Q2 and year-end data. As with Stop and Search, the disproportionality index requires the analysis of the full report.
5. Taser use also remains broadly consistent between Q2 and year end data, accounting for approximately 3% of all use of force reports. Taser 'use' is defined as the device being drawn (from its holster), aimed, the subject being 'red-dotted'

¹ [Police use of force statistics, England and Wales: April 2019 to March 2020 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/90444/policing-uk-statistics-2019-2020.pdf)

or the device being discharged. There were 74 uses of Taser over the last FY, of which only 3 (4%) were discharged.

6. Nationally, for the year ending March 2020 (most recent national statistics available) discharges of Taser accounted for 10% of all recorded uses². So, despite the increasing availability of Taser amongst CoLP officers we are still seeing a below average use rate.
7. We are reviewing the HMICFRS' thematic national report on the disproportionate use of police powers³. We will bring a further update to your next committee meeting. However, on our initial assessment we are already compliant with the majority of their recommendations and have work in progress in relation to the outstanding recommendations.

Conclusion

8. 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. Previous quarterly data for Q1 and 2 Force Stop and Search data is published on the Force Website⁴ which provides transparency to the public that we serve.

Appendices

Appendix 1- Summary Infographics for Stop and Search and Use of Force for FY 2020-21.

James Morgan

Superintendent, Head of City Police Task Force (CPTF)

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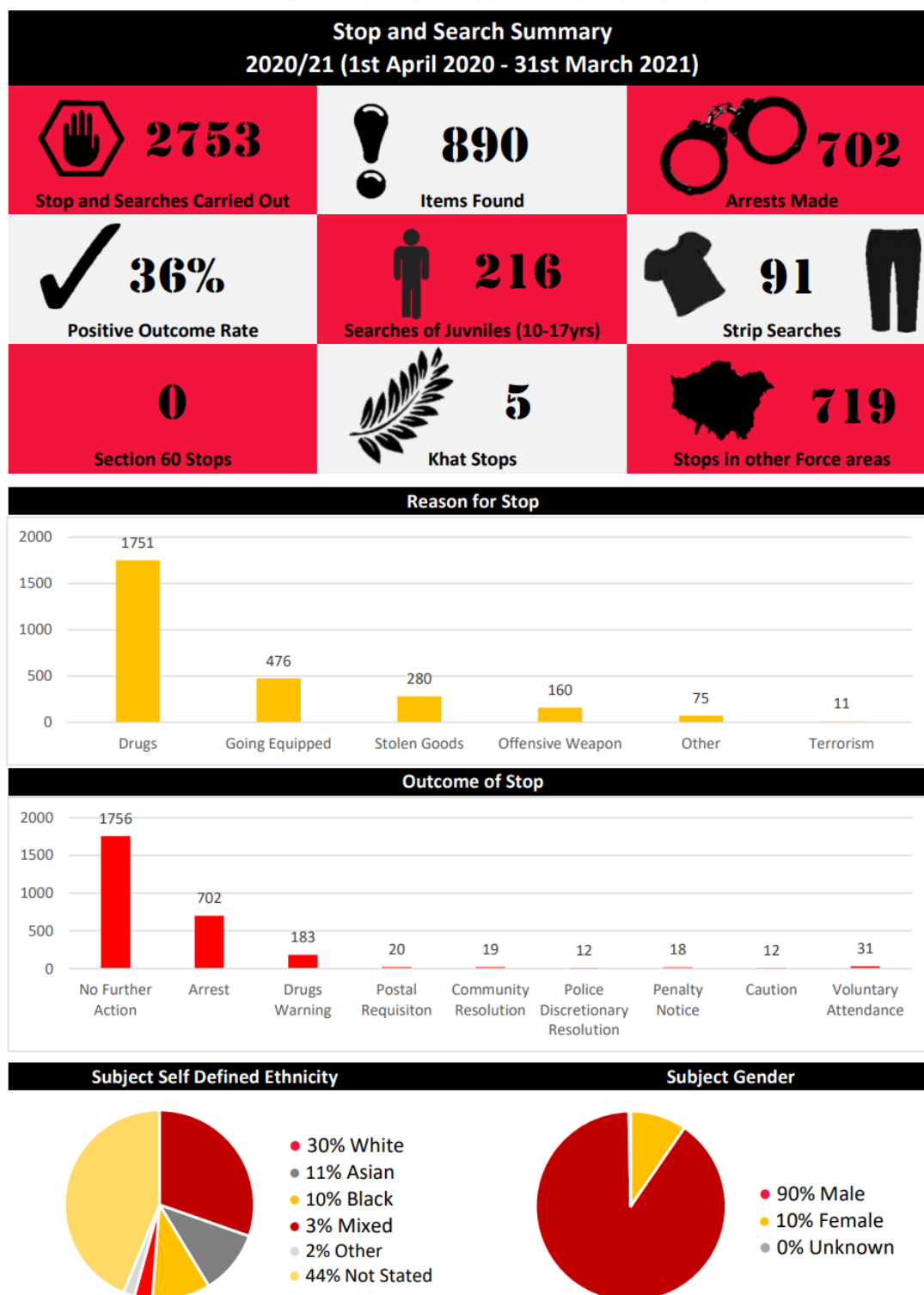
² [Police use of force statistics, England and Wales: April 2019 to March 2020 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

³ [Disproportionate use of police powers: A spotlight on stop and search and the use of force \(justiceinspectorates.gov.uk\)](https://justiceinspectorates.gov.uk)

⁴ <https://www.cityoflondon.police.uk/police-forces/city-of-london-police/areas/city-of-london/stats-and-data/stats-and-data/>

Appx 1- Q4 / End of FY 2020-21-Stop and Search data Summary infographic⁵

CITY OF LONDON POLICE: SUITABLE FOR PUBLICATION

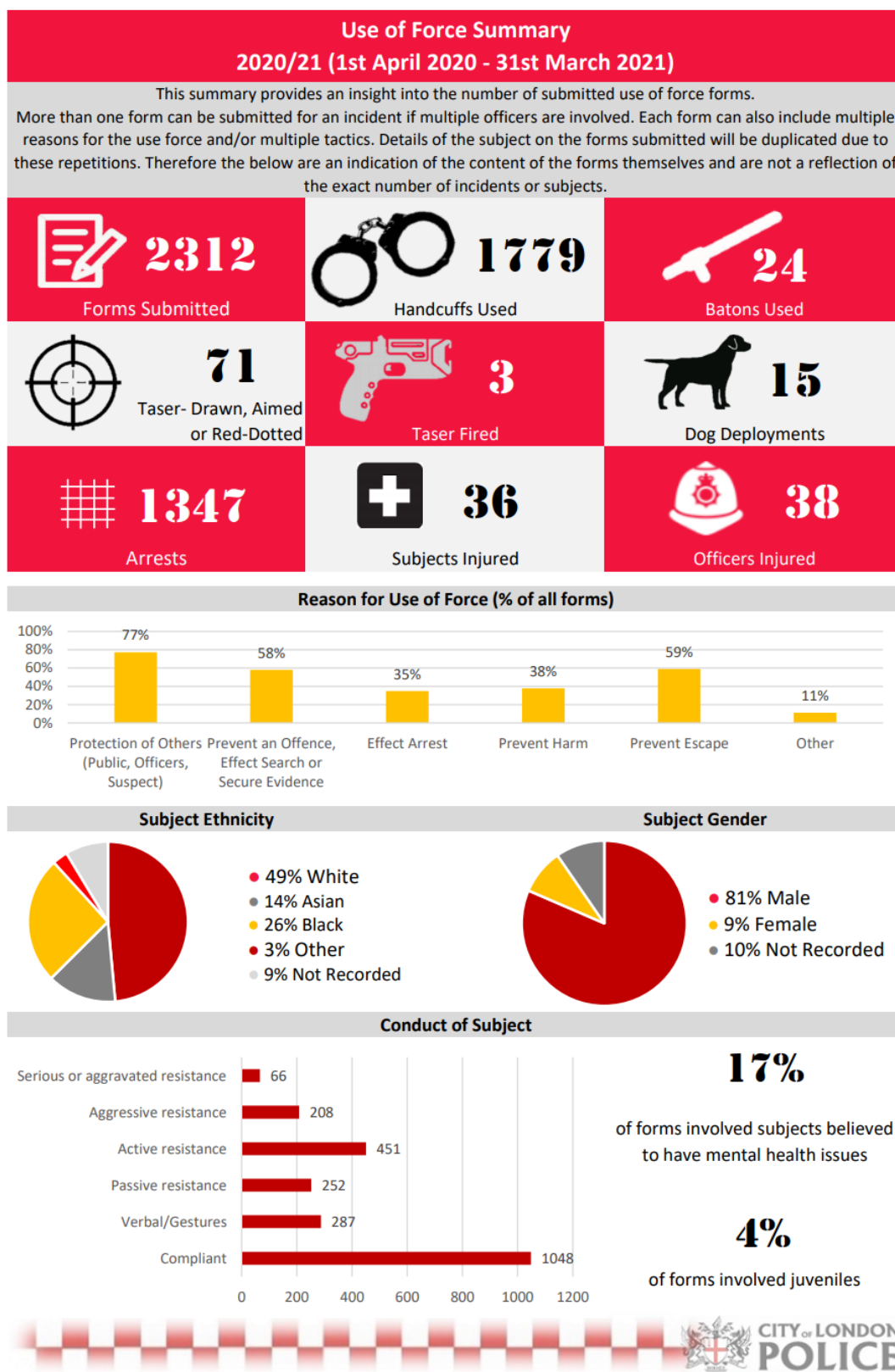


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⁵ These figures are preliminary and need to be reconciled before the figures are finalised for the full report that will be published, but are indicative.

Appx 1-Q4 / End of FY 2020-21-Use of Force data Summary infographic⁶

CITY OF LONDON POLICE: SUITABLE FOR PUBLICATION



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⁶ 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

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Committee(s): Police: Professional Standards and Integrity Committee	Dated: 6 th May 2021
Subject: Equality and Inclusion Highlight Report	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	3
Does this proposal require extra revenue and/or capital spending?	NA
If so, how much?	NA
What is the source of Funding?	NA
Has this Funding Source been agreed with the Chamberlain's Department?	NA
Report of: Commissioner of Police Pol 31-21	For Information
Report author: Head of Strategic Development	

Summary

Further to the last report to your Committee, this report presents the latest position regarding the Equality and Inclusion (E&I) Action Plan, which is the principal delivery mechanism of the Equality and Inclusion Strategy. The Strategy was submitted to your November 2020 Committee for information.

A consolidated action plan has been developed, high level details of progress against the plan are appended to this report and an example of how the workstreams will report in future are at Appendix A.

Appendix B provides a summary of the Force's position relating to the recommendations made by the City of London Corporation's (CoL) Tackling Racism Taskforce report.

Also attached at Appendix C is current E&I workforce data relating to BAME and Gender recruitment which is also reported to the Strategic Planning and Performance Committee (Formerly Performance and Resource Management Committee).

Recommendation(s)

It is recommended that Members note the report.

Main Report

Background

1. At the informal meeting of the Police Authority Board (PAB) on the 2nd April 2020, the Force presented the quarterly Equality and Inclusion Update which had been a standing quarterly item for a number of years as previously agreed. The report

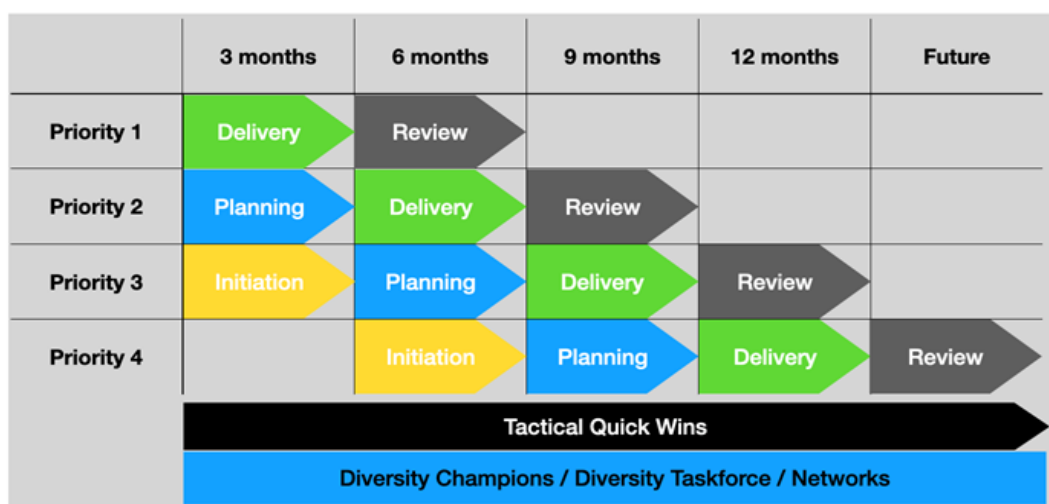
was noted, and the Commissioner updated that the Force was reviewing its governance of this area of business and was introducing an Equality & Inclusion Operational Delivery Group that would be a tactical level group, attended by all equality and support network representatives and leads who will take ownership for delivery of specific areas of work. Members discussed the format of the update going forward and agreed that it would be more appropriate to have an update focused on deliverables and outcomes rather than a general narrative update.

2. The Force received direction from the Police Authority Team that going forward this report would be an item at the PSI Committee rather than the main Board. The Force agreed with the Deputy Chief Executive that future reports to the PSI would focus on the refreshed Strategy and delivery of the action plan as this would be more performance and outcome focused.
3. Members may also recall that the Town Clerk submitted a report to the Police Authority Board in February 2021 under AOB regarding the recommendations from the CoLs Tackling Racism Taskforce and the Force undertook to review these and provide an update on the Force position in relation to these recommendations. (See Appendix B).

Current Position

4. A consolidated action plan to deliver the E&I Strategy and which considers the NPCC¹ Equality Toolkit has been produced and is now being used by the Force to drive activity across the E&I agenda. It is recognised this is very much an internal working document, which will continue to evolve as issues and themes emerge nationally. The Force has engaged a temporary dedicated resource (until June 2021) who has pulled the plan together. They have also proposed a robust reporting and governance regime to ensure that work continues and those charged with delivery can be held to account by the Force's E&I Operational Delivery Board and the E&I Strategic Board. That proposal was agreed by the E&I Strategic Board on 09/04/2021 and is outlined for Members' information at paragraphs 7-10.
5. Action plan delivery has been prioritised as outlined immediately below:

¹ National Police Chiefs' Council



6. The plan has been split into priorities 1 – 4, spanning the next 12 months. These have been agreed by both the T/Commander (ECD) in his role as Chair of the Delivery Board and Assistant Commissioner Sutherland as Chair of the Strategic Board and communicated to all attendees of both Boards.. It has been distributed to all members of the boards and accountable owners identified for all priority items.
7. Attached at Appendix A is a highlight report that was presented at the E&I Strategic Board on 09/04/2021 and provides Members with an update of progress made and a brief reference to next steps.

Governance

8. The outgoing structure relied on individual champions for each protected characteristic to support networks and lead E&I projects. The advantage was it provided a senior voice for each network and allowed the champions to be focussed on their own area, effectively becoming a specialist. The disadvantage was that limited project delivery by champions to only their area. For example, an LGBT+ champion was only responsible for delivering change to that protected characteristic. This limited the sharing of ideas and projects across the diversity spectrum.
9. Whilst this approach was workable, being focused on the delivery of a detailed action plan means the Force needs to be set up for success and create an environment of change accountability and ownership.
10. In the new structure, the Force has established portfolios of activity across the diversity spectrum and assigned senior leads who are accountable for the scope and delivery of their portfolio. Existing E&I Champions will be Special Advisors, supporting both the Networks in their continued development, and advising Portfolio Leads utilising their subject matter expertise. Portfolio Leads will be responsible for delivering workstreams to all diversity strands. E&I Champions would be responsible for supporting and mentoring individual networks, guiding them in best practices and ideas to develop the network.

11. A Diversity Taskforce would be recruited through volunteers to become delivery owners, supporting Portfolio Leads in change delivery. This will be driven by the E&I Delivery Board and held to account by the E&I Strategic Board.

Tackling Racism Taskforce

12. The Force has been engaged with the City of London Corporation's Tackling Racism Taskforce from its commencement, the Co-Chairs had several meetings with the Force before formal Taskforce sessions regarding the work of the City of London Police initiatives to tackle racism and increase diversity.
13. The Taskforce has received presentations from Assistant Commissioner Sutherland and the T/Commander (ECD) Chair of the Delivery Board at its meetings. The Chair of the Police Authority Board was also in attendance at both meetings on the police workstream.
14. Following publication of the Taskforce's report, CoLP has reviewed the recommendations to consider where additional action is necessary by the Force. Attached at Appendix B is a summary of the Force's position against relevant recommendations.

Options

15. There are no options or proposals within this report.

Corporate & Strategic Implications

Strategic implications – The report outlines ongoing activities which the Force is undertaking to improve diversity, equality and inclusion and in so doing will help to deliver the Force's Equality and Inclusion Strategy and directly supports the Corporation's Corporate Plan's aims for equality of opportunity.

Financial implications – none.

Resource implications – none.

Legal implications – none.

Risk implications – none.

Equalities implications – The report outlines how ongoing work supports the Force to meet its obligations under and comply with the provisions of the Public Sector Equality Duty 2010.

Climate implications – none.

Security implications – none.

Conclusion

16. This report provides Members with details of work that is ongoing to deliver the Force's Equality and Inclusion Strategy, and provides Members with

assurance that robust governance is in place to ensure progress continues as expected.

Appendices

- Appendix A – Highlight summary of progress made against the E&I Action Plan and example of how workstreams will report in future.
- Appendix B – Summary Force Response to Tackling Racism Taskforce Report
- Appendix C – E&I Workforce BAME/ Gender Recruitment Data

Stuart Phoenix

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APPENDIX A E&I Action Plan highlights

Workstream	Highlight	Next steps
Leadership & Culture	Communication from Commissioner Dyson sent out signalling the commencement of our E&I strategy and outlining the finding of the Inclusive Employers report	Continue to monitor feedback on communication
	Assistant Commissioner Sutherland has been assigned as Chief Officer Lead on Equality and Inclusion	E&I Strategic board set up to meet quarterly
	E&I Project Governance structure proposed with the inclusion of senior level E&I Portfolio Leads to drive forward workstreams	Review proposal at Strategic Board
	Police and Crime plan updated to include protected characteristics and signed off by the PAB	Comms to publicise on intranet
	Allies scheme launched across all protected characteristics	Continue to recruit and train allies
	Networks continue to consider new ways to highlight diversity	Omar Haque is setting up a promotional video to highlight diversity
Workstream	Highlight	Next steps
Training and Development	Reverse Mentoring pilot commenced in January with 5 partnerships including 3 from protected characteristics	4 new partnerships to join the scheme in July including 2 from protected characteristics. Formal evaluation of scheme in august/september
	PDR objective for Chief Superintendents has been drafted and signed off with guidance on how objectives need to be delivered through the principles of equality, diversity and inclusion	Comms will launch in March and new PDR objective will go live at the beginning of April
	A positive action development programme (PALS) is now in pilot phase with 8 BAME officers and staff taking part	The pilot will conclude in July and we will evaluate and consider rolling out further to include other protected characteristics
	Unconscious Bias Learning completed by 73% of the force	Evaluate completion rates and aim to reach 100%
	Senior Leadership diversity training is in the final design stages and ready for sign off	Supts and above will receive training on 6 th and 7 th May
	Buddy scheme introduced for new starters with protected characteristics. All have been offered a buddy at Insp or Ch Insp level	Continue to evaluate feedback and success of the scheme
	L&OD have been commissioned by Commissioner Dyson to work with the SLT to further embed the force's leadership/cultural commitments of empowerment, people growing and innovation	L&OD are delivering a three hour CPD event for the SLT in March.












Workstream	Highlight	Next steps
Recruitment & Onboarding	Recruitment dashboard is now being produced on a monthly basis and supplied to E&I Operational Delivery Board for review	Utilise data to develop E&I aspirational targets for future workforce recruitment
	HR System now updated to allow people to update their protected characteristics	Continue to drive communications on this to encourage people to update
	From November 2020, IAG are now sitting on interview panels to provide independent scrutiny	HR to review most recent findings
	Vetting process has now been updated to include a referral to a senior officer in the event a person with protected characteristics is declined	Evaluate new process and recommend to become BAU
Workstream	Highlight	Next steps
Retention and Exiting the organisation	Exit interview process is being reviewed and improved to include a new survey and encourage greater participation in the process	Process map new exit interview process and launch trial
Workstream	Highlight	Next steps
Community Engagement	We have engaged with the MPS to undertake joint community based recruitment events utilising role model officers from CoLP	Further meeting with MPS outreach teams to agree next steps
	We have agreed with work alongside Amazon to undertake a diversion programme within schools, looking at both paths to recruitment and crime prevention	Meeting with City Corporation to map out next steps
Workstream	Highlight	Next steps
Health and Wellbeing	COLP wellbeing strategy has been written covering 5 key areas of wellbeing; physical, mental, emotional, financial and organisational	Health and Wellbeing Strategy will be governed through the H&W Board and onwards to Strategic Workforce Planning
	Financial wellbeing – Established new working relationship with Police Mutual who offer financial support to our staff around debt management.	Police Mutual have presented to multiple directorates and present to Student Officers during training that support is available.
	TRIM practice is being refreshed and repurposed to ensure we offer appropriate support to staff in the event of involvement in traumatic incident	
	Surveyed staff to measure our response to covid and long covid	Working with Police Federation to publish an Aide Memoire to guide supervisors
	Working with L&OD to support student officers and supervisors with training packages to increase awareness with wellbeing for their staff	Continue to develop and roll out training packages

Example update slide

Workstream	L&OD	Owner	Ch Insp L&OD	Date	April 2021	Project RAG		Benefit RAG	
Workstream objectives				Key Deliverables					
<ul style="list-style-type: none">Police leaders should through their continuing professional development seek out opportunities to understand issues that affect underrepresented groups and address them through strategy and action planningPolice leaders should consider the use of ‘reverse mentoring’ to be more engaged with their workforceEquip selection panels with unconscious bias training for all those involved in the recruitment process.Invest in training and development of Police leadersColp to develop a talent management program for upward and lateral developmentColp to ensure mentoring/coaching and support mechanisms are in place to support officers with protected characteristicsStaff with Protected Characteristic should at the commencement of their service be sign posted to support groups to seek early guidance should it be required.Review the PCDA programme to ensure it aligns with E&I plans and principles				Description					Date
				PDR objective launching					1/3/21
				Leadership training delivery					6/5/21
				PCDA Launch					TBC
				Reverse mentoring new partnership training					1/6/21
				PALs pilot review and recommendations					1/8/21
				Unconscious Bias learning					Ongoing
Progress since last update				Key next steps					
<ul style="list-style-type: none">PDR objective signed off and comms have launched ready for go live on 1st AprilReverse Mentoring pilot underway with 5 partnerships including 3 from protected characteristicsUnconscious Bias training now completed by 73% of officers and staffLeadership training programme has been scoped and is in development with Inclusive Employers for all Supts and abovePALs scheme is up and running with 8 BAME officers taking partBuddy scheme has been introduced for all new starters to support them with developmentPCDA EIA has been completed and signed off ready to progress to next stage of planning implementation				<ul style="list-style-type: none">PDR objective go live on 1st AprilTrain additional reverse mentors in June ready to expand the scheme further with 4 new partnerships including 2 from protected characteristicsWe are looking in to an additional unconscious bias training piece recommended by the Corporation – 90 minute presentationFinalise leadership training and review with T/Commander Blackburn on 3rd April					
Recommendations / Risks to Operational Delivery Board				Decisions required by Operational Delivery Board					
None at this stage				None					

Example milestone plan

Portfolio	L&OD	Owner	Ch Insp L&OD	Date	Project RAG		Benefit RAG					
Workstream	Project	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
Training	Leadership training	<div>Training design</div> <div>Review & S/O 29/4</div> <div>Delivery 6/5</div> <div>PIR 10/5</div> <div>28/5</div> <div>Review future training needs</div>										
	Organisation wide	<div>Design and record Focus on Sessions</div> <div>28/5</div> <div>7/6</div> <div>Focus On sessions Live</div>										
	Unconscious bias	<div>Unconscious Bias online learning</div> <div>PAB recommended learning</div>										
	PCDA	<div>EIA complete</div> <div>Target QSA review</div> <div>Implementation planning</div>										
Ongoing Development	PDR objective	<div>Comms 28/3</div> <div>Launch 1/4</div> <div>Leadership continual professional development</div>										
	Reverse Mentoring	<div>5 partnerships in place with 6 weekly check in</div> <div>New partnership training 1/6</div> <div>30/6</div> <div>Launch 1/7</div> <div>Formal Evaluation</div>										
	Mentoring	<div>Mentoring is well established across 3 tiers, including both internal and external. This is now treated as a BAU activity.</div>										
	Talent Management	<div>Talent Management Strategy updated</div> <div>PALS pilot</div> <div>Review pilot and present recommendations</div> <div>ECD programme</div>										

APPENDIX B – Tackling Racism Taskforce Recommendation	CoLP Response
Anonymised recruitment across all grades (not just at senior levels) be introduced	Anonymised recruitment is in place for all grades 
Mentoring and reverse mentoring schemes be developed	Mentoring is in place and a reverse mentoring pilot commenced in January with 5 partnerships including 3 protected characteristics 
All local training budgets are amalgamated to HR, and professional and technical training, which supports service delivery, is funded from local risk	Training budgets are overseen by L&OD as part of HR. Elements of E&I project are funded by the programme via Strategic Development 
A scheme be developed that provides and defines a “safe space” for staff and provides clarity on the terms of reference(s) for meetings convened to discuss tackling racism with staff	We are reviewing whether this could form a part of the Allies scheme potentially as a future phase 
Current and possible schemes that support work experience programmes with schools and young adults be explored	This is a key part of our community engagement workstream and is continuing to be progressed via areas like the Police Cadet Scheme 
For a HR policy on bullying and harassment to be developed	CoLP has HR policies on bullying and harassment that will continue to be reviewed 
Consideration be given as to how we could better utilise the collected, published data and information on diversity of its workforce at all levels	We produce a monthly recruitment and workforce dashboard that is utilised to inform our continuing programme of activity 
The Tackling Racism Taskforce encourage better engagement between the City of London Police and Black communities, as well as schools and businesses. For example, consideration could be given as to whether the City of London Police should take part in a pilot of independent body worn video reviewers.	Our community engagement workstream is focussed on improving engagement with communities. The Professional Standards and Integrity committee receive random dip samples of BWV footage for oversight / Scrutiny. We are considering IASG also receiving dip samples 
The Tackling Racism Taskforce would encourage the City of London Police to sign up to the 40% recruitment target that the Metropolitan Police had recently announced	CoLP is undertaking a task to set aspirational targets for future recruitment. As part of this review we are considering the 40% target The Metropolitan Police have announced, subject to SMB approval 
The Tackling Racism Taskforce would also recommend the City of London Police set a retention target of Black, Asian and Minority Ethnic officers	We will be reviewing setting targets in this area following completion of our aspirational targets 
It was noted that the City of London Police do some good work in this area, but the public do not tend to know about this. The Tackling Racism Taskforce would therefore recommend improving communications on the diversity work they do	We have a comms strategy aligned to our ongoing work 

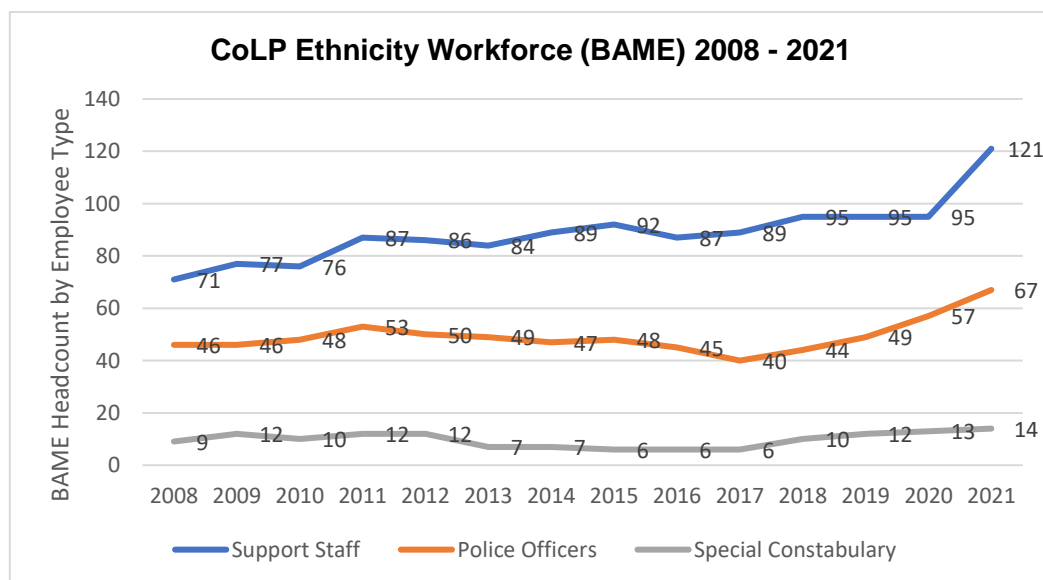
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Appendix C

BAME and Gender Recruitment Data Update¹

1. For this reporting period (1st October 2020 to 31st March 2021), the number of BAME Police Officers has increased to 67 and the number of BAME Police Staff has increased to 121. The graph below represents the number of Black, Asian and Minority Ethnic (BAME) Police Staff, Officers and Special Constabulary within the CoLP at the end of the financial year from 2008 to 2021.
2. When compared nationally, CoLP Staff BAME representation rate is ranked as second highest among all national forces (not including BTP) and is fifth highest for Officer representation (not including BTP).
3. The Force has made a decision to incorporate the BAME Action Plan into the national NPCC Workforce Representation, Attraction, Recruitment, Progression & Retention Delivery plan, which is reviewed continuously. The force's Equality & Inclusion Operational Board oversees the work on the NPCC plan. The force, has made improvements on a number of areas. For example, the force is now advertising more widely and is supporting internal applicants through application writing and interview workshops. In addition, there has been an introduction of a buddy system where BAME officers are supported from a buddy when they join the force. The force has also commenced some positive action initiatives.

CoLP Workforce Profile by Ethnicity 2008-2021 (financial year)

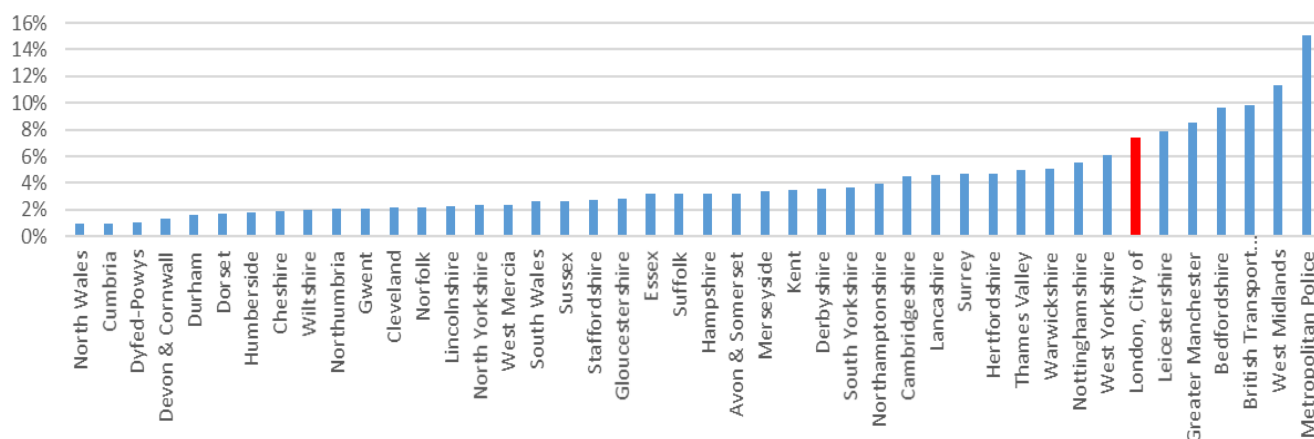


¹ NB: This data is also reported to the Strategic Planning and Performance Committee (formerly Performance and Resource Management Committee)

Officer BAME representation - National Comparison

(National Statistics Police workforce open data tables March 2020)

BAME Officers (% of Headcount) - 31 March 2020

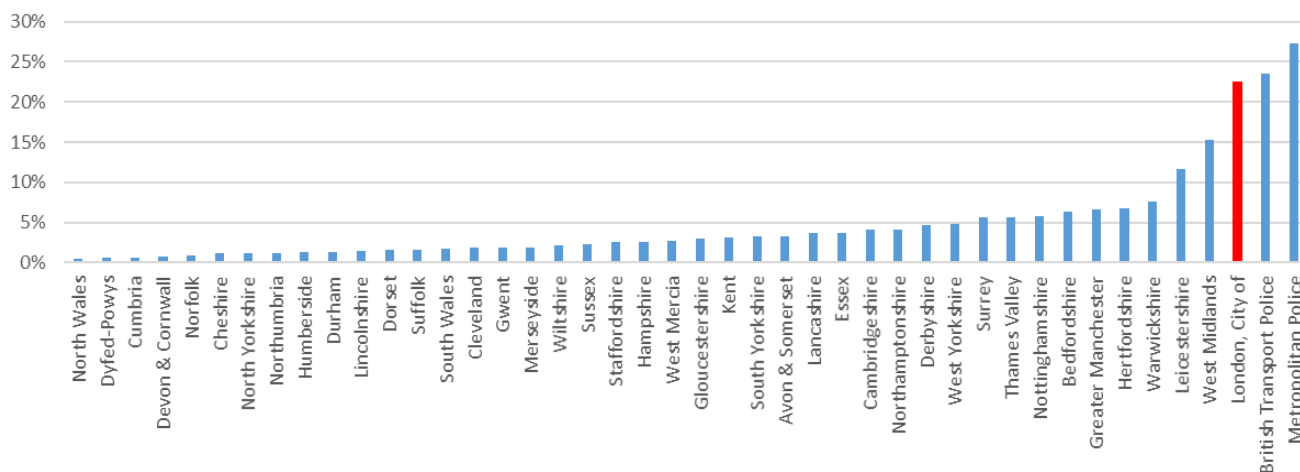


Source: Police Workforce, England and Wales, 31 March 2020

Staff BAME representation - National Comparison

(National Statistics Police workforce open data tables March 2020)

BAME Staff (% of Headcount) - 31 March 2020



Source: Police Workforce, England and Wales, 31 March 2020

Gender

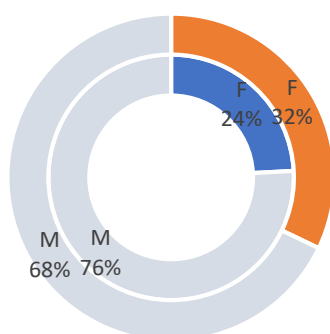
- The percentage of female Police Officers has increased this financial year. As part of 2019-2024 People Strategy, CoLP is continuing to undertake a number of activities to improve female representation. Approximately 21% of applications received for Police Officer roles were from female applicants; 26% of Police Officer new joiners were female in the reporting period.

The national average for female Police Staff stands at 62.5% as at 31 March 2020, as of March 2021 CoLP's female Police Staff representation rate is 57.8%. It is worth noting that the Force has a more even representation of male and female Police Staff.

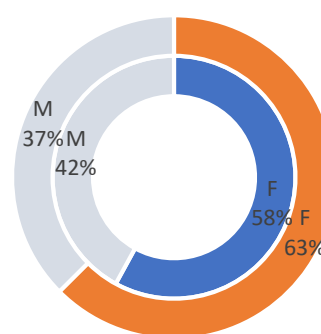
Gender Comparison

- City of London – March 2021
- National Comparison (England and Wales) - March 2020

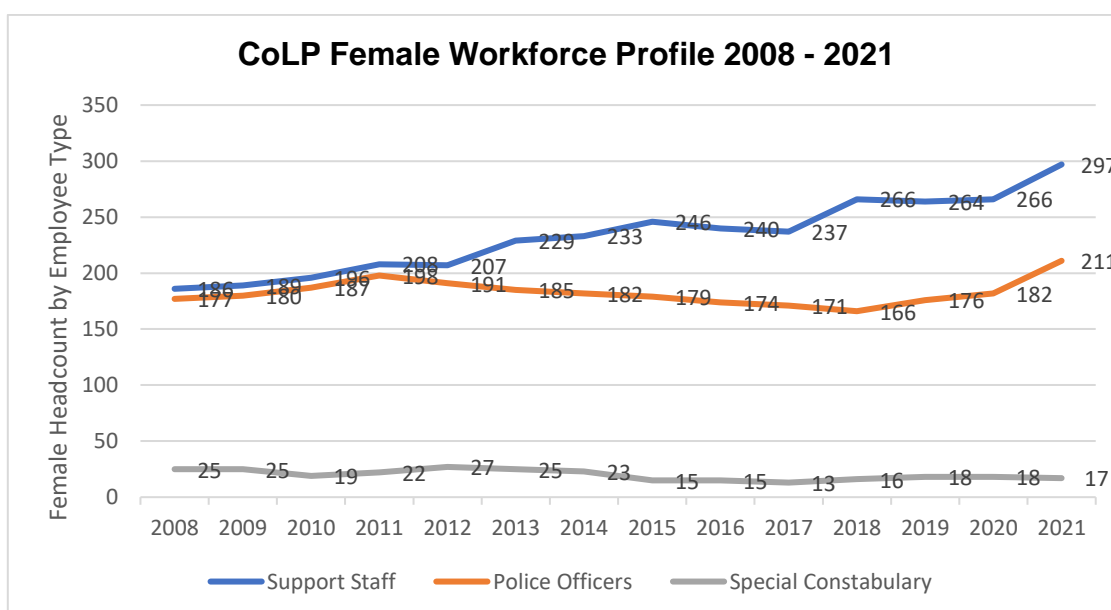
Officer Gender Profile



Staff Gender Profile



Workforce Female Gender Profile – 2008-2021



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Committee(s): Professional Standards and Integrity Committee	Dated: 06/05/2021
Subject: Integrity and Code of Ethics Update	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	3
Does this proposal require extra revenue and/or capital spending?	NA
If so, how much?	£
What is the source of Funding?	NA
Has this Funding Source been agreed with the Chamberlain's Department?	NA
Report of: Assistant Commissioner	For Information
Report author: Head of Strategic Development	

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 5th March 2021. The next ISB is scheduled to take place on 9th June 2021. It is not therefore possible to provide Members with details of that meetings, however, the ISB dashboard considered at that meeting can be provided to Members for information and assurance following the ISB.

Code of Ethics Update:

The Force has held its first City of London Police only ethics panel on 22nd April 2021. This followed publication of 2 articles on the intranet, one of which was specifically aimed at promoting the event and recruiting new Ethics Associates. As a result of that article, 7 new volunteers have been accepted as Associates, which offsets those lost to natural staff turnover over the past few years.

No national meeting of the UK Police Ethics Guidance Group has taken place since your last Committee; however, a national meeting is scheduled for 29th April 2021. A date for the next Regional meeting is still awaited.

Recommendation(s)

It is recommended that Members 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 5th March 2021, which followed your February 2021 Committee. The next ISB is scheduled 9th June 2021, which of course follows this Committee. 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. The Chair of your Committee and a representative of the Police Authority is invited to those meetings and a copy of the dashboard considered at the meeting can be distributed to Members for information following the ISB.

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 held the first City of London Police (CoLP) specific event on the 22nd April 2021. This followed 2 articles that were published on the Force intranet, one of which was to specifically promote the event and attract new volunteers to be Ethics Associates. As a result of that article, 7 new volunteers have been accepted as Associates, which replaces those that have been lost over the past few years as a result of natural staff turnover. A copy of the article that appeared on the intranet is attached for Members' information at Appendix A.
4. At that event on 22nd April an update was provided by the Metropolitan Police Service (MPS) Co-ordinator on proposals which are being made for the continuation of a London-wide panel, however, it was noted that a formal decision is still to be made by the MPS regarding whether that is an approach they support.
5. Participants at the event also considered 2 ethical questions, one of which related to offering police officers surplus Covid vaccinations ahead of other priority groups. This was a question forces' ethics panels have been specifically asked to consider by the Regional Group. The opportunity was also taken by the Head of Strategic Development to explain to those present that the Integrity portfolio would be transferring to Professional Standards from June 2021, as previously advised to your Committee.

UK Police Ethics Guidance Group and Regional Police Ethics Network.

6. The next national meeting of the UK Police Ethics Guidance Group (UKPEGG) is scheduled to take place on 29th April. As that date is post the submission deadline for documents to your Committee, it is not possible to include a summary of the meeting, however, a verbal update will be provided at your Committee.
7. A regional meeting was scheduled to take place immediately following the UKPEGG, however, it has been postponed and a date is still to be set, although it is expected to be during May 2021.

Integrity Standards Development Plan

8. The Integrity Standards Development Plan is appended to this report for Members' information at Appendix B.
9. With the exception of one action, all are either now delivered or (in one case) closed. The only outstanding matter is to review the development plan, which is not due to take place until the Summer, after responsibility for it transfers to Professional Standards.

Options

14. There are no options or proposals within this report.

Corporate & Strategic Implications

15. Strategic implications – none.
16. Financial implications – none.
17. Resource implications – none.
18. Legal implications – none.
19. Risk implications – none.
20. Equalities implications – none.
21. Climate implications – none.
22. Security implications – none.

Appendices

- Appendix A – Integrity Delivery Plan April 2021 Update

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Be a part of CoLP's new ethics forum

SP

Stuart Phoenix

HEAD OF STRATEGIC DEVELOPMENT

Would you like to be a part of a new policing ethical dilemma forum being established by the City of London Police, discussing key issues to aid our learning and development? Then read on...

For over four years, CoLP has been a founder member of the London Police Challenge Forum (LPCF). Since its launch in December 2016, the LPCF has discussed over 50 ethical dilemmas and has been a pivotal member of regional and UK-level ethics networks. These include ethics committees from the Royal Navy, Royal Marines, NHS Trusts & leading universities. City of London Police officers and police staff members have been key participants in these discussions.

Why do we need ethics committees and forums?

These environments provide an opportunity to discuss 'grey areas' where there's no immediate right or wrong answer. An example of when this led to real change was when groups around the country discussed the rights and wrongs of relationships at work. This was then debated at the national level and led directly to the introduction of the NPCC Guidance on Inappropriate Relationships in the Workplace. Opinions are sought on real-life issues too, for example, on the appropriateness of providing facilities to test drugs at a music festival, instead of confiscating them and taking action against the users.

Ethics forums continue to increase and grow in popularity across London and the wider policing family. Each member of the LPCF (CoLP, British Transport Police, Metropolitan Police Service and National Counter Terrorism Policing HQ) is now establishing their own independent ethics forums. These, in turn, will feed into a wider London forum, also being set up for the future.

CoLP's new independent ethics forum will build on the success of the former LPCF and contribute to the future London forum, with direct access to the United Kingdom Police Ethics Guidance Group (UKPEGG), chaired by the NPCC lead for the Police Code of Ethics.

Find out more and take part in the forum

This is where you come in! On 22 April 2021 at 1100, Stuart Phoenix, Head of Strategic Development, is holding the first official CoLP ethics engagement forum of 2021, via Teams. During the session, approximately 60 to 90 minutes, more information will be provided on police ethics forums and **two** topical ethical dilemmas will be discussed. Further examples of the kind of thing you might find yourself discussing include whether being a freemason is incompatible with being a police officer or whether facial recognition technology is discriminatory.

Want to have your say? To get involved and register your interest, please email Stuart Phoenix. **This opportunity is open to all officers and staff but please register with Stuart before attending.**

Join on your computer or mobile app

[Click here to join the meeting](#)

POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2020-21

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

2. Development Measures	Traffic Light Tracker			
	Sep 20	Nov 20	Jan 21	Apr 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	GREEN
2.2 Work with the MPS Coordinator to revise the LPCF Terms of Reference	NEW	AMBER	CLOSED	CLOSED
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	NEW	WHITE	WHITE	WHITE
2.4 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assessment report when published (<i>carried forward</i>)	AMBER	RED	GREEN	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

- 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)	Sep 20	Nov 20	Jan 21	Apr 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. Meeting held 22nd April 2021	GREEN	GREEN	GREEN	GREEN
1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas	In existence and attend Integrity Standards Boards	GREEN	GREEN	GREEN	GREEN
1.5 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes	In existence, last outcomes published 12 th December 2019 (none since that date – checked 22nd Apr 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 LPCF.
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>April 2021 update: Resourcing issues meant that the intended meeting date had to be postponed to April, however, prior to the meeting 2 articles were published on the Force intranet, one specifically aimed at promoting the Ethics Panel and asking for new volunteers. A second article focusing on a televised programme regarding historic corruption in policing, also linked the article to the Ethics Panel piece. As a result of the publication, 7 new volunteers have offered to become Ethics Associates.</p> <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>April 2021 update: Further to the below, no decision has yet been made by the MPS regarding the future of any London-wide Ethics Group, however, the Force is prepared and capable to engage with such a group should one be re-established.</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 Nactional Crime Agency updated threat assessment was received in December 2019, against which Force documents are being evaluated. It is anticipated this will be GREEN by the due date.</p>	

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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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

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

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of the Local Government Act 1972.

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