



Professional Standards & Integrity (Police) Committee

Date: FRIDAY, 5 NOVEMBER 2021
Time: 10.00 am
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

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

Enquiries: John Cater
John.Cater@cityoflondon.gov.uk

Accessing the virtual public meeting

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https://youtu.be/8Ei_qAjCcyc

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 and summary of the meeting held on 8 September 2021.

For Decision
(Pages 5 - 12)

4. **REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 13 - 14)

5. **EQUALITY AND INCLUSION HIGHLIGHT REPORT**

Report of the Commissioner.

For Information
(Pages 15 - 24)

6. **Q2 STOP AND SEARCH UPDATE**

Report of the Commissioner.

For Decision
(Pages 25 - 34)

7. **INTEGRITY AND ETHICS UPDATE**

Report of the Commissioner.

For Information
(Verbal Report)

8. **GLOSSARY**

For Information
(Pages 35 - 42)

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 8 September 2021.

For Decision
(Pages 43 - 46)

13. **NON-PUBLIC REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 47 - 48)

14. **PROFESSIONAL STANDARDS STATISTICS Q2: JULY - SEPTEMBER 2021**

Report of the Commissioner.

For Information
(Pages 49 - 66)

15. **ACTION FRAUD STATISTICS Q2: JULY - SEPTEMBER 2021**

Report of the Commissioner.

For Information
(Pages 67 - 74)

16. **ANNUAL ETHICAL PARTNERSHIPS UPDATE**

Report of the Commissioner.

For Information
(Pages 75 - 86)

17. **POLICE COMPLAINTS INFORMATION BULLETIN ANNUAL DATA**

Report from the Independent Office of Police Conduct.

For Information
(Pages 87 - 106)

18. **COLP - HISTORICAL SEXUAL MISCONDUCT**

Report of the Commissioner.

For Information
(Pages 107 - 110)

19. **PROFESSIONAL STANDARDS DIRECTORATE CASES**

Report of the Commissioner.

For Information
(Pages 111 - 112)

- a) Case dealt with under Complaint and Conduct Regulations 2019 (Pages 113 - 114)
- b) Case dealt with under Complaint and Conduct Regulations 2019 (Pages 115 - 118)
- c) Case dealt with under Complaint and Conduct Regulations 2019 (Pages 119 - 122)
- d) Case dealt with under Complaint and Conduct Regulations 2019 (Pages 123 - 126)

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

21. **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
Wednesday, 8 September 2021**

Draft public Minutes of the meeting of the Professional Standards and Integrity
Committee of the City of London Police Authority Board held on Wednesday, 8
September 2021 at 9.00 am

Present

Members:

Deborah Oliver (Deputy Chairman)
Douglas Barrow
Nicholas Bensted-Smith
Tijs Broeke
Mary Durcan
Alderman Professor Emma Edhem
Helen Fentimen
Michael Mitchell (External Member)
Alice Ripley (External Member)
Deputy James Thomson

Officers:

Alistair Sutherland	- Assistant Commissioner
Hayley Williams	- City of London Police
Alex Orme	- Town Clerk's Department
Simon Latham	- Town Clerk's Department
Martina Elliot	- City of London Police
Rebecca Caldicott	- City of London Police
Ian Younger	- City of London Police
James Morgan	- City of London Police
Rob Atkin	- City of London Police
Rachael Waldron	- Town Clerk's Department
Clinton Blackburn	- City of London Police
Claire Cresswell	- City of London Police
John Cater	- Town Clerk's Department

1. APOLOGIES

Apologies were received from Caroline Addy.

**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 6th May 2021 be
approved as an accurate record.

4. REFERENCES

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

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. CoLP have recently held an internal only challenge panel – the results of which will be published on intranet soon – this will be circulated/highlighted to Members when available.

IN PROGRESS – Results from the internal only challenge panel will be provided to the November PSI within the ISB and ethics update.

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.

May update - Officers informed Members that the most recent quarter's data had not yet been published – full data would be made available for next the meeting of the Committee in September.

COMPLETED - Members agreed to close the action. The Victim Satisfaction results get routinely reported to the SPPC as part of the quarterly performance reporting and the Force would wish to avoid duplicate reporting.

10/2020/P – 14 September 2020 Questions – External Scrutiny

IASG Members to meet PS&I Members in 2021. The Police Authority Team would be following up on this and would liaise with the Chair post-meeting. Members asked that any meeting would ideally take place before the summer recess.

COMPLETED – Members agreed to close this action. The Police Authority Team is organising quarterly informal meetings for Chair of PSI and Chair of IASG to meet and discuss mutual activity.

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. May Update - First AI/Data Ethics session took place in late April. Members asked officers to set up a repeat session for new Members of the Committee (and for any other Members who missed the April session) to take place, ideally, before the summer recess. Officers would circulate the presentation papers in the interim.

COMPLETED – Members agreed to close this action. A session took place in April 2021 at which only 4 Members attended. Instead of setting up a repeat session it was agreed with the PA Team that the presentation would be circulated to all members instead.

15/2020/P – 26 November 2020 Item 11 IOPC Investigation 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.

May 2021 update - Members requested that the Training Session take place before the summer recess.

COMPLETED – Members agreed to close this action. Three Briefing sessions have been set up for Members during September 2021.

2/2021/P – 6 May 2021 Item 5 Stop and Search and Use of Force Update Summary - End of Year 2020-21

The Chair asked officers to see if they could capture and present the figures for individuals who had been routinely stopped and searched (with a negative outcome). Officers responded that they would take this away and report back to the next meeting of the Committee; they pointed out that whilst able to compare the internal CoLP records, the Force did not have access to the figures held by the Metropolitan Police, so a true picture for those being routinely stopped and searched by all Police forces may not always be completely accurate.

COMPLETED – Members agreed to close this action. An explanation on this point has been covered in the Stop and Search report on the (September) agenda.

3/2021/P – 6 May 2021 Item 6 Equality and Inclusion Highlight Report

Noting the usefulness of the Inclusive Employers Report, the Chair requested that a summary of the Report's findings is brought back to the Committee for its next meeting.

COMPLETED – Members agreed to close this action. A summary was included in the E&I item on the (September) agenda.

4/2021/P – 6 May 2021 Item 7 Integrity and Code of Ethics Update

The Chair requested that officers include the updated Integrity Standard Board (ISB) Dashboard for information at the next meeting of the Committee. This will reflect the data presented to the next meeting of the ISB on 9th June.

IN PROGRESS: Unfortunately, the ISB meeting was cancelled and no ISB meeting has taken place in the last reporting period. This will be reported to the November PSI Committee.

5. **EQUALITY AND INCLUSION HIGHLIGHT REPORT**

The Committee received a Report of the Commissioner of the City of London Police concerning the activities supporting the delivery of the Equality and Inclusion Strategy.

A Member, noting the welcome approach to greater diversity across the Police's workforce, queried whether there were measurable benefits that could be presented to senior Officers and Members when reviewing and analysing the progress made. Officers responded that building up this data was a key part of the current workload in this area and it was anticipated that both the Inclusive Employer staff survey results and the CoLP HR commissioned Attraction Plan (2019 – 2024) would give a greater indication of the scale of measurable benefits. Members requested that the Attraction Strategy be circulated to Members of the Committee when signed off by officers.

In addition, officers proposed that future iterations of Equality and Inclusion update Reports would provide greater visibility of the 6 separate workstreams.

In response to a query, officers confirmed that a reverse mentor scheme was in place and a "buddy" scheme had been developed, which matched BAME recruits with inspectors.

In response to a query, the Assistant Commissioner confirmed that the Strategic Workforce Plan operated in parallel with the Corporate Plan. It was important to emphasise the golden thread that existed between each of these plans and officers would ensure that this was a key focus in written Committee Reports going forwards.

In addition, new recruitment was overseen by senior officers and the Force had an ambition to have a 40% uplift in BAME recruits overall. It was noted that the next intake was 60% BAME with further progress being made. In response to

concerns about a lack of firm timelines on recruitment milestones, officers confirmed that a good deal of work was currently being undertaken in this area internally, and a Review was taking place on the whole recruitment process. A Recruitment Manager and a Senior Strategic Diversity Lead were planned, the latter appointment was in line with other Forces.

Separately, the Assistant Commissioner informed the Committee that greater use was being made of the Police's staff associations, than was the case previously, in order to assist with recruitment drives.

On behalf of the Committee, the Deputy Chair expressed special thanks to the Assistant Commissioner for all his efforts in this area. This would be the Assistant Commissioner's last meeting of the Committee before he departed the City of London Police later in the autumn.

RESOLVED – that the Committee noted the Report.

6. STOP AND SEARCH UPDATE- Q1 2021-22

The Committee received a Report of the Commissioner of the City of London Police concerning stop and search data for Q1 2021-22.

Reflecting on the current 60% effectiveness rate of Servator trained successful stop and searches, a Member noted that this represented a slight drop off from previous years, where the figure had hovered around 69%. The Assistant Commissioner explained that given the recent increased number of Servator trained officers, the downward trend was expected as it does take some time for these officers to gain practical experience; he anticipated that this rate would increase to previous levels as these newly trained officers became more skilled.

The Assistant Commissioner added that the benefit of Servator is that it gives officers more time to embed themselves in an area and gain local knowledge, meaning that stop and searches usually built firmer grounds, which then raises the likelihood of a successful outcome from the stop; in contrast "BAU" stop and searches are by necessity more reactive, providing officers with shorter time frames to prepare and carry out searches (with the likelihood that negative outcomes are more frequent). The national average for positive outcomes from "BAU" (i.e. non-Servator) stops equated to an average of between 12 – 18%.

In response to a query, the Assistant Commissioner confirmed that the City of London Police still carried out the training of Servator for other UK wide Forces. Most of these Forces had a lower success outcome rate than in the City, again this was primarily due to newly trained servitor officers having less experience and it was anticipated that numbers would increase over time to similar rate to that which is seen in the City.

In response to a query concerning the handcuffing of children, officers reviewed in detail each case. The operational view was that it was often difficult to distinguish between a 16/17 year old and a 18/19/20 year old, but, clearly cases where the individual was significantly younger (in one case a 14 year old)

would need to be closely examined. It was noticeable, at least anecdotally from front line officers, that the demographic composition of those coming into the City during the evenings had, post-lockdown, shifted to a younger average age cohort, with potential knock-on implications for the frequency of those aged under 18 being handcuffed.

Officers undertook to include an update on Use of Force on children in the next Stop and Search update report to the next meeting of the Committee in November. It was important to stress that, operationally, handcuffing a minor was not necessarily wrong if that individual was posing a serious physical threat to officers and members of the public or themselves; however, it should be noted that front-line officers do not operate a handcuff-by-default policy, it is up to each officer to justify the operational need for use of force and/or restraint.

Officers informed Members that, as the Force did not have access to the relevant data sets of other national forces, it was unable to track the frequency that individuals were repeatedly stopped and searched in total. In terms of the frequency of stops in the City, unfortunately, an automated method to check this was not available and a manual check was not something that the Force could progress at this current time due to the resource implications.

Officers confirmed that an individual's stop and search history was not something that is asked for as a standard question during a stop, and, based on anecdotal experience, it was difficult to glean a pattern from the range of responses from individuals (some would be very forthcoming about previous experiences, whereas others wouldn't engage verbally at all with officers). It was also noted that stops are not recorded on the PNC which only records criminal offences.

Officers confirmed that, whilst information sharing existed with other Forces on intelligence, there was no data shared on this specific area. It was also pointed out that negative outcomes from stop and searches meant that it could well be viewed as disproportionate to then record that person's personal information, given they had done nothing wrong.

Ultimately, the significant determining factors and challenges would be that all Forces would have to be willing to work together on this, and that the scale of the data resources required for a shared database would need to be met nationally. This was currently not something that was being explored at a national level. Officers, stated that as CoLP was part of the national working group on Stop and Search (the lead being Chief Constable Lucy D'Orsi) they would, however, pose the question about shared information to this group and include a response in the Q2 Report.

RESOLVED – that the Committee noted the Report.

7. STAFF SURVEY 2020- UPDATE

The Committee received a Report of the Commissioner of the City of London Police concerning the 2020 Staff Survey.

In response to a query, officers confirmed that focus groups were being held in the follow up to a Survey of under-represented groups and undertook to bring a supplementary update back once these had concluded.

RESOLVED – that the Committee noted the Report.

8. **GLOSSARY**

The Committee received a set of glossary terms for information.

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

There were no questions.

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

There was no other urgent public business.

11. **EXCLUSION OF THE PUBLIC**

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

12. **NON-PUBLIC MINUTES**

RESOLVED - that the non-public minutes of the meeting held on 6th May 2021 be approved as an accurate record.

13. **NON-PUBLIC REFERENCES**

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

14. **NFIB FULFILMENT LETTERS- OUTCOME OF TRIBUNAL APPEAL**

The Committee received a Report of the Commissioner of the City of London Police concerning NFIB fulfilment letters.

RESOLVED – that the Committee noted the Report.

15. **ACTION FRAUD STATISTICS – QUARTER 1 – 1ST APRIL 2021 – 30TH JUNE 2021**

The Committee received a Report of the Commissioner of the City of London Police concerning the Action Fraud Statistics for Q1.

16. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 1 – 1ST APRIL 2021 – 30TH JUNE 2021**

The Committee received a Report of the Commissioner of the City of London Police concerning the Professional Standards Statistics for Q1.

17. **PROFESSIONAL STANDARDS DIRECTORATE CASES**

The Committee received a Report of the Commissioner providing a sample of recent Professional Standards Directorate cases.

18. **CASES DEALT WITH UNDER COMPLAINT AND CONDUCT REGULATIONS 2019**

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

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

There were no non-public questions.

20. **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 urgent non-public business.

The meeting ended at 10.20 am

Chairman

Contact Officer: John Cater
John.Cater@cityoflondon.gov.uk

PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

PUBLIC OUTSTANDING REFERENCES

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. CoLP have recently held an internal only challenge panel – the results of which will be published on intranet soon – this will be circulated/highlighted to Members when available.	Head of PSD	Complete - results have been received and circulated to members for info and interest.
4/2021/P	6 May 2021 Item 7 – Integrity and Code of Ethics Update	The Chair requested that officers include the updated Integrity Standard Board (ISB) Dashboard for information at the next meeting of the Committee. This will reflect the data presented to the next meeting of the ISB on 9th June.	Head of PSD	IN PROGRESS - Unfortunately, the next ISB meeting has been set for 10 th November to be chaired by Commissioner Dyson. The Dashboard will therefore be provided to the next meeting.
5/2021/P	8 September 2021 Item 5 – Equality and Inclusion Update	Members requested that the Attraction Strategy be circulated to Members of the Committee when signed off by officers.	Assistant Commissioner/ HR Director	In Progress -The Attraction Plan is being updated currently and will be available in early 2022. It will be circulated to Members when it is signed off.

PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

6/2021/P	8 September 2021 Item 6 – Stop and Search Update Q1 2021/22	Officers undertook to include an update on Use of Force on children in the next Stop and Search update report to the next meeting of the Committee in November.	Head of City Police Task Force & Head of Contact	Complete- this is included in the Q2 update on the agenda
7/2021/P	8 September 2021 Item 6 – Stop and Search Update Q1 2021/22	<p>Officers confirmed that, whilst information sharing existed with other Forces on intelligence, there was no data shared on this specific area (frequency of stop and searches for individuals). It was also pointed out that negative outcomes from stop and searches meant that it could well be viewed as disproportionate to then record that person's personal information, given they had done nothing wrong.</p> <p>Ultimately, the significant determining factors and challenges would be that all Forces would have to be willing to work together on this, and that the scale of the data resources required for a shared database would need to be met nationally. This was currently not something that was being explored at a national level.</p> <p>Officers, stated that as CoLP was part of the national working group on Stop and Search (the lead being Chief Constable Lucy D'Orsi) they would, however, pose the question about shared information to this group and include a response in the Q2 Report.</p>	Head of City Police Task Force & Head of Contact	Complete- an update on this is included in the Q2 update on the agenda

Committee(s): Professional Standards and Integrity Committee	Dated: 5 th November 2021
Subject: Equality and Inclusion Highlight Report	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1 and 3
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 83-21	For Information
Report author: David Cleverley, Strategic Development	

Summary

Further to the last report to your Committee in September 2021, this report presents the latest position regarding activity supporting the delivery of the Equality and Inclusion Strategy, which was originally submitted to your November 2020 Committee for information.

As presented in September, a delivery plan which is split into themes, each with a senior lead, has been developed, details of progress against the plan is appended to this report at Appendix A.

Recommendation(s)

It is recommended that Members note the report.

Main Report

Background

1. At the previous Committee in September, it was agreed that going forward the force would present a report focussed on the refreshed strategy and workstreams, with further details on specific actions that will be delivered across the 6 workstreams. This report contains highlights across the programme of activity and further detail of each workstream and timelines can be found in appendix A.

Current Position

2. Since your last Committee in September 2021, work has progressed across a range of E&I related areas, driven by the Force's E&I Delivery Group, chaired by

the T/Commander ECD and overseen by the Force's E&I Strategic Board, which had been chaired by Assistant Commissioner Sutherland for his tenure.

3. Highlights of work include:

- a. All workstream leads are now appointed, briefed, and have started driving forward their individual portfolios. We have amended the structure of both our delivery board and strategic board and workstream leads are required to attend both to provide updates on delivery progress. Our Strategic Board is now being chaired by AC McLaren.
- b. As has been previously updated, we have organised our NPCC's 48 point Action Plan into 6 themed areas, each headed by a Chief Superintendent or staff equivalent (there are 5 leads in total as one has responsibility for 2 connected areas):
 - i. Recruitment & Onboarding - HR Director
 - ii. Training and Development – HR Director
 - iii. Leadership & Culture – Ch Supt Operational Change
 - iv. Community Engagement – Ch Supt HQ Services
 - v. Retention & Exiting – Ch Supt Economic Crime
 - vi. Health & Wellbeing – Ch Supt Local Policing
- c. An update of initiatives to deliver the action plan, broken down by strand area, is attached at Appendix A.
- d. We are progressing a review of our current E&I structure and looking to provide additional resource to support the E&I manager and workstream leads. This will potentially include offering temporary support roles to graduates from our recent PALs talent development programme. A further update will be provided for the next Committee.
- e. Our September intake of 12 officers has been completed and includes 60% BAME and 16.6% female. All joined the force on the 21st September 2021. A community outreach plan being developed to commence recruitment process for new Constables for September 2022. The draft plan shows 20 new student officers to start in November 2022 plus approximately 40 transferees. Our plans also include attracting volunteers and Specials from diverse communities.
- f. The Black Police Association (BPA) in consultation with charity brap¹ commissioned a survey in July specifically for our Black, Asian and Minority

¹ <https://www.brap.org.uk/>

Ethnic police officers and police staff. Although the results are not yet available, we are aware of a high completion rate across the force.

- g. The new starter buddy scheme has now been adapted to include all new student officers. The scheme was offered to all 12 of the September intake and taken up by 8 of them.
- h. Our joint schools project with AWS (Amazon) planning continues with a planned launch date of November 21 running until Jan/Feb 2022. We are working closely with the Tackling Racism Taskforce (TRT) to plan.
- i. The City Police Cadets relaunched with 18 new cadets (25 in total). 56% female and 52% BAME. We have plans in place to increase this to 50 cadets over the next 18 months
- j. As part of our Health and Wellbeing Strategy we will be training and launching 60 Mental Health first aiders for January 2022. We are also launching a new wellbeing space in Bishopsgate Police Station on 15th November

Impact

- 4. When Inclusive Employers formally assessed the Force against its maturity model, the Force was considered to be 'Compliant'. The Force's aim is to move to 'Established' by 2024. CoLP will not make that determination itself but is currently exploring with Inclusive Employers the cost of conducting another assessment to see what impact the actions being taken by the Force are having on its progress along the Diversity Maturity Model. Although the aim is to achieve Established by 2024, it is anticipated that the depth and range of activities being undertaken by the Force will see us achieving this well before 2024, and possibly moving through the intervening level of 'Programatic'.
- 5. Further to this we are looking at other KPI measures that can be put in place to assess progress against our plan. These will include both qualitative and quantitative measures across surveys, focus groups, the workforce data. We continue to review our diversity dashboard via both our delivery board and strategic board and will utilise this method to assess progress against our agreed aspirational targets

Corporate & Strategic Implications

- 6. 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.
- 7. Financial implications – none.
- 8. Resource implications – none.
- 9. Legal implications – none.

10. Risk implications – none.

11. 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.

12. Climate implications – none.

13. Security implications – none.

Conclusion

21. 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.

Contact:

David Cleverley

Project Manager

Equality and Inclusion

Strategic Development

City of London Police

Workstream	Recruitment & Onboarding	Owner	Director of HR	Date	15/10	Project RAG		Benefit RAG	
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Workstream objectives	Priority	
<ul style="list-style-type: none"> CoLP to undertake detailed analysis of workforce data and produce aspirational targets Complete a cradle to grave review of all recruitment processes Review our vetting approach with regards to those with protected characteristics with a priority focus on minority ethnic groups. Set up feedback processes for unsuccessful candidates and promote development plans for future potential candidates Ensure transparency with all recruitment, progression and exit from service data in respect to all protected characteristics Ensure diversity visibility throughout recruitment process 	Description	Date
	Ratify aspirational targets and sign off	Ongoing
	Review our recruitment and attraction structure and people	TBC
	Review promotion processes end to end	TBC
	Present new vetting approach to committee for approval	TBC

Progress since last update	Key next steps
<ul style="list-style-type: none"> ERT Recommendation: Aspirational targets have been produced and review by the E&I Strategic Board DASG feedback of inspectors and sergeants promotion process will be reviewed and used to assist in the promotion process review Work is continuing on the recruitment website being hosted by the force rather than an external company which will make updates easier. September intake of 12 officers includes 60% BAME and 16.6% female all joined the force on 27th September 2021. 	<ul style="list-style-type: none"> External recruitment is currently minimal and we are therefore we are planning limited activity to drive a candidate pipeline Current applicants in the pipeline for student officers are undertaking their Day 2 activity. A review will be undertaken once results are back to confirm the cohort for early 2022. With the results impacting to when the next student officer campaign launched. We will commence planning for future recruitment events with both internal and external engagement Following departure of our head of recruitment and attraction we are looking at how we structure our existing resource to focus on this priority area We are about to kick off an end to end review of our promotion process which will take in to consideration E&I and how this is considered through the cycle

Recommendations to Operational Delivery Board	Decisions required by Operational Delivery Board
None at this stage	None

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Workstream	Culture & Leadership	Owner	Ch Supt Transform	Date	15/10	Project RAG		Benefit RAG	
Workstream objectives				Priority Deliverables					
<ul style="list-style-type: none">Leaders to ensure they create an inclusive culture within the organisationCreate a culture where people feel confident to share their protected characteristicsObjectivise leaders to continuously improve approach to inclusivity and ensure learning is regularDevelop a framework of champions and senior leaders to drive forward our E&I agenda and work with internal and external partners to promote our activityRecognise and reward good work and bravery across E&IUndertake annual workforce surveysFurther develop consultation and feedback mechanisms that enable all staff to take part in broad organisational decision makingScope partnership and secondment opportunities outside the organisation to enhance and build new skills in leaders				Description					Date
				Launch Values and Standards workshops					04/22
				Develop an E&I secondment framework					02/22
				Develop and launch a comms strategy with calendar of events					TBC
				Complete a data bias review and recommendations					03/22
				Introduce an annual E&I award as part of future event					07/22
				Further develop our allies scheme					2022
Progress since last update				Key next steps					
<ul style="list-style-type: none">ERT Recommendation; Senior workstream lead has been appointed to lead Culture and Leadership for E&I and cover synergies with TransformOur comms strategy has kicked off with the creation of a diversity video highlighting our approach to inclusivity for internal and external use (final edit being completed prior to release)Diversity champions have been appointed across all protected characteristics and workstream leads appointed across all portfolios in E&IA high-level culture roadmap has been agreed with Commissioner Dyson. This reinforces the role of Colp's leadership programme in promoting E&ICommissioner Dyson and Assistant Commissioner McLaren have led internal forums exploring the experiences of female members of staff				<ul style="list-style-type: none">Finalise E&I video and launch internally and externally across social media platformsE&I conference to take place before the end of Q1 2022 to outline the progress we've made and next steps. This will be a core part of our comms strategyDevelop framework for annual values and standards workshops and submit funding request in October 21 for approvalReview our existing external secondment process and look at senior opportunities for both short and long term secondments for senior staff to develop skillsKick off data bias review work to understand if / how data creates a cycle of cultural bias within our policing practices. This will be linked in to communities workstream.Hold a hidden protected characteristics workshop to develop our understanding of why individuals may not feel comfortable disclosing their protected characteristics.					
Recommendations to Operational Delivery Board				Decisions required by Operational Delivery Board					
None at this stage				None					

Workstream	L&OD	Owner	Director of HR	Date	15/10	Project RAG		Benefit RAG	
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Workstream objectives	Priority	
<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 planning Police leaders should consider the use of 'reverse mentoring' to be more engaged with their workforce Equip selection panels with unconscious bias training for all those involved in the recruitment process. Invest in training and development of Police leaders Colp to develop a talent management program for upward and lateral development Colp to ensure mentoring/coaching and support mechanisms are in place to support officers with protected characteristics Staff 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
	Cultural Workshop- Agreement next steps / outcomes	11/10/21
	Reverse Mentoring re-launch	20/10/21
	Community Engagement plan for PEQF	04/11/21
	PALs review cohort 1 and launch cohort 2	2021 end
	Pilot of Mentivity Training	Nov 2021

Progress since last update	Key next steps
<ul style="list-style-type: none"> PDR objective has launched and been communicated, attendance at 'focus on' sessions has helped many leaders as starting point on addressing this objective. ERT Recommendation: Reverse Mentoring pilot underway with 5 partnerships including from protected characteristics, advert for new candidates posted. Unconscious Bias training now completed by 78% of officers and staff, 118 attended Chief Supt Raj Kohli session on UB in policing. All of SLT have received E&I training, cultural workshops have taken place and next steps presented to Commissioner Cohort 1 of PALS scheme completed, feedback captured, plans underway for launch of cohort 2. PCDA EIA has been completed, inclusion of community engagement noted 	<ul style="list-style-type: none"> Production of community engagement plan for student officer training and related (i.e. PST) Delivery of Mentivity Training Pilot Interviews for reverse mentoring candidates 10/11 November, training set for 24th Nov Inclusion of support network delivery into induction courses Future of Leadership Development Programme and handover between Commissioner to take place, alongside Comms piece for force

Recommendations to Operational Delivery Board	Decisions required by Operational Delivery Board
-- Cohort 2 of PALS to be delivered for BAME officers and staff with consideration for broadening to other groups as part of future intakes	

Workstream	Health and Wellbeing	Owner	Ch Supt Local Policing	Date	15/10	Project RAG		Benefit RAG	
Workstream objectives				Priority Deliverables					
<ul style="list-style-type: none">Staff with Protected Characteristic should at the commencement of their service be sign posted to support groups to seek early guidance should it be required.Develop a local plan that incorporates Health and Safety, Wellbeing and FulfilmentEnsure CoLP leaders are equipped to deal with Mental Health difficultiesImplement wellbeing initiatives to improve peoples quality of life whilst at workFocus on staffs mental health and embed supportive and preventative policies and initiativesReview current HR policies to ensure the maximum support is given to all staff with protected characteristicsEnsure teams supporting our Occ Health are trained in issues around inclusion and diversity				Description			Date		
				Launch a Buddy Scheme for all new joiners (completed)			10/21		
				Launch full comms strategy on Health and Wellbeing			01/22		
				Oskar Kilo recommendations and planning			11/21		
				60 MH first aiders to be trained and launched			01/22		
				Launch Wellness Zone in Bishopsgate			11/21		
				Long covid support group launch			01/22		
Progress since last update				Key next steps					
<div>Page 22</div> <ul style="list-style-type: none">Buddy scheme has now been adapted to include all new student officers, October 21 has seen a new intake of students 12 in total all have been offered a buddy 8 have joined the scheme.Anonymous questionnaire was sent to 70 student officers to seek feedback on culture and overall initial training and the buddy scheme . Feedback has now been received which is being analysed . Working group with leads to be establishedWellness zone and Prayer room has been created and finalised awaiting launch.MH in house trainer is in the process of completing her training with 60 MH first aiders have been identified .Terms of reference have been created to guide the MH first aiders. Await launch date .Oscar Kilo self assessment has been completed and sent to OK for review and await outcome and updates				<ul style="list-style-type: none">Buddy scheme to be considered/reviewed for the feasibility to launch to assist new staff members joining the organisation to help familiarise themselves within the CoLP.Await return of Oskar Kilo self assessment framework create action and delivery plan on areas of improvement.Launch MH first aiders within force 60 have been identifiedOpen the wellness zone in Bishopsgate station launch date set for 15November .Re launch TRIM process and ensure it is embedded in the review and debrief of incients within the force.					
Recommendations to Operational Delivery Board				Decisions required by Operational Delivery Board					
None at this stage				None					

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Workstream	Community Engagement	Owner	Ch Supt HQ	Date	15/10	Project RAG		Benefit RAG	
Workstream objectives				Priority Deliverables					
<ul style="list-style-type: none">Establish a Silver Group to lead on community engagement E&I activity including outreach and attraction for recruitmentHost community based outreach sessions for engagement and recruitmentEstablish longer term engagement with schools and colleges in order to attract and nurture future talent and introduce young people to policingWork with local strategic partners to develop a shared data set that will allow for a better understanding of the communities we serveUtilise data sets to better inform and identify areas of disproportionality and the negative impact on local communitiesEngage in a calendar of events with the local community to promote good relationsIdentify and engage with diverse communities to address possible adverse perceptions of the police service so that satisfactions levels improve across all communitiesUndertake meaningful involvement and consultation with local communities to review such tools as Stop and Search and Use of ForceEvolve our force to be culturally competent to deliver legitimate and meaningful community policing				Description		Date			
				Commence recruitment outreach plan		12/21			
				Map city communities / key individuals, calendar of engagement events		12/21			
				Launch inaugural 12 week schools project across the city		11/21			
				Set & agree key performance indicators for activity		11/21			
				Launch community based cluster panels		10/21			
				Pilot LGBT+ advisor network		11/21			
				Involve community in scrutiny of S/S, UoF wider police training		Ongoing			
Progress since last update				Key next steps					
<ul style="list-style-type: none">Silver Group has been established and owners for each part of the plan assigned. Draft KPI's completedRT Recommendation; Join schools project with Amazon planning phase continues with planned launch November and to run through to January / FebruaryCity Police Cadets re launched with 18 new cadets (25 in total). 56% female / 52% BAME. Plans to recruit to 50 over the next 18months.Community outreach plan being developed to commence recruitment process for new Constables for Sept 2022. Draft plan shows 20 new student officers to start Nov 22 + approximately 40 transferees. Our plans also include attracting volunteers and Specials from diverse communities. (Draft attraction plan is in place)Recruitment for new cluster panels has commenced focus on attracting diverse background, experiences & skillsWork with the IASG continue to ensure scrutiny is taking place looking at HR processes, Stop & search / use of force & police complaint matters				<ul style="list-style-type: none">Working with COLC to map diverse communities and link into existing diverse staff networks in business and share best practice re how police can best listen to these groups.Plan to engage young people from diverse groups and creation of a calendar of community / city based events for opportunities to engage & recruit.Recruitment outreach events will commence in December to deliver new officer intake for Nov22 and our ambition to attract a wider diverse pool of Special Constables, Police Staff & Cadets. This will include assigning mentors & 'meet the City Police events' to reassure candidates & guide through the recruitment process.Deliver Amazon school pilot project but work with COLC to develop work further in schoolsWork to establish a youth IASG , work with chair of IASG to increase use & engagement in force activity. Engage further in legitimacy work S&S, UoF, complaintsIncorporate diverse communities in police training e.g recruit, stop & search trainingPlan bespoke community insight events e.g. force open day, decision making exerciseContinue to develop LGBT advisor recruitment – further training planned for NovContinue to develop and send out specific & tailored community messaging across a range of channels					
Recommendations to Operational Delivery Board				Decisions required by Operational Delivery Board					
None at this stage				None					

Workstream	Retention and Exiting	Owner	Ch Supt	Date	15/10	Project RAG		Benefit RAG	
Workstream objectives				Priority Deliverables					
<ul style="list-style-type: none">Ensure policies and procedures are in place to identify why staff with protected characteristics leave the service.Undertake a full review of retention figures and consider the need for setting retention targets across protected characteristicsUtilise positive action principles to proactively contact BAME officers and staff within two years of them exiting the organisation to encourage them to returnConsider national policies to allow exit and re-entry in to the organisationUndertake a review of what roles within the organisation could most benefit from greater flexibility in staff entering and exitingWidely readvertise rejoining options				Description					Date
				Create a new process map for our exiting employee journey					TBD
				Set retention targets across our protected characteristics					TBD
Progress since last update				Key next steps					
<ul style="list-style-type: none">A Ch Supt workstream lead has been appointed and is now undertaking a review of activity to prioritise key elements for initial focusIt has been agreed we will initially focus on the exit journey to undertake a review of the various procedures and processes and current areas of concern, and we will look at how we can set retention targets aligned to our aspirational recruitment targets.We have completed an initial process map of the resignation journey that requires further review and scrutiny.We have an e-survey in place offered to all those exiting the organisation. Results from this are fed in to HR. The survey is being reviewed as part of the full journey review.				<ul style="list-style-type: none">Complete the mapping of the as is exiting journey to identify current issues and gapsDraft a new journey including a mechanism for driving change from issues identified with feeds in to all other workstreamsTRT Recommendation; Look at setting retention targets across protected characteristics					
Recommendations to Operational Delivery Board				Decisions required by Operational Delivery Board					
None at this stage				None					

Committee(s): Police Professional Standards and Integrity Committee (PSIC)	Dated: 5 th November 2021
Subject: Q2 Stop and Search Update	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	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 82-21	For Information
Report author: Superintendent James Morgan, Head of City Police Task Force & Head of Contact	

Summary

At the time of writing this report, only the summary data (appended below) was available. It is anticipated that the full report will be available before the Committee meets, but it will not have been scrutinised as the Stop/Search and Use of Force Working Group next meets after the Committee's November meeting. Key trends will be verbally briefed to members at the Committee meeting.

Since the last Stop/Search and Use of Force report three briefed sessions have been held for PSIC and Independent Advisory and Scrutiny Group (IASG) members, which were well received. A further (evening) session is planned for before the end of the year. Opportunities for 'ride alongs' for members to see the powers being used in action are being planned, as is a comparable session of Use of Force for the new year.

The number of stop/searches in this quarter remains broadly consistent with previous quarters, with only a variation of 2 against Quarter 1. The positive outcome rate is 33% for this quarter, a slight (but not statistically significant) variation on Q1, and consistent with the established trend. Monthly averages are also consistent with the previous 12 month average. Whilst searches under the Misuse of Drugs Act remain the largest single group in this quarter, there has been an increase in searched under s1 of the Police and Criminal Evidence Act (PACE) for 'going equipped'. White individuals (self-defined and officer perceived) account for the largest group stopped and searched in this quarter although 48% of those stopped did not state a self-defined ethnicity (again, consistent with the established trend).

Use of Force in Q2 is down (619) compared to Q1 (782). Handcuffing remains the most used type of force. Taser was used 24 times this quarter, but not discharged on any occasion. There has been a slight increase in the use of force on female subjects (10% in Q2 compared to 5% in Q1). The ethnic breakdown of subjects of use of force remains broadly consistent with Q1.

Recommendation

Members are asked to note the report

Main Report

Background

1. The summary of the Quarter 2 reports for both Stop/Search and Use of Force are attached at Appendix 1 and 2 respectively. At the time of writing, the full analytical reports are not available. As previously briefed to members, this is due to a clash with the quarterly Home Office data extract demanding most of the limited capacity in the Performance Information Unit. The full report should be available before the Committee meets, and key trends will be verbally briefed to members then. However, as the next Stop/Search and Use of Force Working Group does not meet until after the Committee's November meeting the analytical report will not have been through that internal scrutiny process.

Current Position – Stop Search

2. The summary quarterly analytical report is attached at Appendix 1.
3. As with previous quarters, there are no substantial variations in the established trends which are evident from the summary data. Whilst there is a slight variation between Q1 (715) and Q2 (713) this is not statistically significant. The variation in the positive outcome rate shows slightly more variation (33% Q2, 37% Q1) but again this is not statistically significant.
4. Searches for drugs under the Misuse of Drugs Act powers continue to account for the largest number of searches, which is consistent with the established trend. However, in Q2 there was a marked increase in searches for 'going equipped' under the s1 Police and Criminal Evidence Act powers (85 in Q1, 182 in Q2). It is likely that this increase was driven by the large-scale protests, linked to Extinction Rebellion, that occurred in the City during August and September, where officers may have stopped and searched individuals on the reasonable suspicion that they had items for committing criminal damage (paint etc) in their possession.
5. Without the full analytical report, we are unable to comment on the disproportionality index at the time of writing. However, as the percentages of self-defined ethnicity for white, black and Asian individuals (and those who declined to self-define their ethnicity) have not changed significantly, then we would expect the disproportionality indexes to remain roughly in line with the previous quarter and established trend.

Current Position – Use of Force

6. The summary quarterly analytical report is at Appendix 2.
7. This quarter has seen a reduction in the use of force: 782 in Q1 compared to 619 reports in Q2. A difference of 163 reports. Although the volume is down, the types of force use remain consistent with previous quarters. Handcuffing remains the most common use of force with 448 reports in this quarter.

8. Notably, Taser use has increased in Q2 compared to Q1. In Q1 it was 'used' 13 times and not discharged at all. In Q2, it has been 'used' 24 times, but as with Q1 there were no instances where it was discharged. Members are reminded that a Taser is classed as being 'used' when the officer draws it from its holster, aims it, or activates the sighting system (also known as 'Red Dotting'). Discharges (when the Taser is fired) are recorded separately from 'uses'.
9. In this quarter 7 officers recorded being injured in incidents involving the use of force, compared to 11 in Q1. Subjects who were injured as a result of the use of Force showed a similar variation: 14 in Q1, 18 in Q2.
10. As with Stop/Search data, in the absence of the full analytical report we are unable (at the time of writing) to comment on the disproportionality index however percentages of subjects self-identifying as white, black, Asian or declining to state a self-defined ethnicity remains broadly constant with the previous quarter. Based on this, the established trend in the disproportionality index is likely to be maintained in this quarter.

Matters arising from previous PSI Meeting

11. Since your last meeting, 3 briefing sessions have been held for members of this Committee and the Independent Advisory and Scrutiny Group (IASG) on police Stop/Search powers. These were well received. We are in the process of making arrangements for members of both the Committee and IASG to attend 'ride alongs' to see these powers being used in a live operational environment. We aim to offer the first dates for this before the end of year.
12. We are planning to provide members with a fourth opportunity to receive the Stop/Search powers briefing during November (date/time to be confirmed).
13. We are also planning for a similar briefing session for members of the Use of Force legal framework early in the 2021, to be followed up with the opportunity to observe key training where officers put that framework into practice (Officer Safety, Taser and Public Order training). Details will be shared with members before the end of the year.
14. A new tactical lead for Stop/Search and Use of Force has now been appointed (Chief Inspector Jo Steed) who will act as a deputy for the Strategic lead (Supt James Morgan).
15. The review of Use of Force involving juveniles is still ongoing. Over Q1 and Q2 force was recorded as being used against 61 juveniles. The majority (73%) were aged 16 or 17; 15% were aged 15, and the remaining 10% 14 or less.
16. Of those 61 reports of Use of Force, Possession of a weapon was a factor in 28% of the reports; drugs in 34% and alcohol 26%. As noted above, we do not have the full analytical report for Q2 but compared to the Q1 report, this represents a slightly higher proportion of incidents involving a weapon (10% for all reports in Q1), and slightly less than drugs and alcohol (46% and 32% respectively for Q1).

17. In the majority of reports (80%) officers recorded that they used force to protect themselves. This is followed by the protection of other officers (67%), protection of the subject and the public recorded in 38% of reports: this is broadly in line with the trend in the Q1 report. Preventing harm was cited in 43% of reports (again in line with the Q1 report), and preventing offences was a reason for force in 39%, which is lower than in the Q1 report.
18. As with overall use of force across both quarters, handcuffing represented the largest single type of force used (77%). Tactical comms feature similarly prominently in this cohort of reports. Taser was used in 10% (6) of reports: none involved discharge. One report involved drawing the Taser, one involved the device being aimed and the remaining 4 involved 'Red Dotting'. All the subjects involved were aged 16, with one exception (aged 15). Possession of a weapon featured in 4 of the 6 reports, and officers recorded being threatened with a weapon in 3 of the 6 reports. Four of the subjects were white, and two black: this is broadly in line with the ethnic breakdown (self-defined) across all use of force reports. Of these incidents, 4 occurred after 2300 and before 0700; a 5th occurred after 2000 and only one occurred during the day.
19. In summary, this sub-cohort of subjects are broadly in line with the wider cohort as a whole, with the notable exception of the involvement of a weapon which features almost 3 times as often with this juvenile cohort, compared to the cohort as a whole (Q1 data). Work is ongoing to further examine these reports, including a dip sampling of Body Worn Video. We will provide further updates with our Q3 report.
20. We have raised the question about tracking subjects of repeat stop/search with the national Stop Search working group. The national lead's office is not aware of any Forces that track subjects stop/searched across Force boundaries (a query has been sent to Forces to confirm). A small number (three) forces reportedly track and report on this: all those Forces operate a different Record Management System (RMS) to the City of London which enables this reporting. Our RMS (Niche) is not currently capable of doing this and to report on this would require a manual examination of hundreds of records which is not viable. We will raise the question in the Niche user group to gauge the interest from other Niche forces for pursuing a software change. However, unless there is a further substantive update from the national lead's office or a positive response from the Niche User Group, we will not report further on this matter.

Conclusion

21. Based on the limited analysis that's been conducted in the absence of the full analytical report, and the scrutiny provided by the Stop/Search and Use of Force Working Group, patterns of stop/search and use of force remain largely consistent with the trends in Force established over the preceding 12-24 months.

Appendices

1. Stop/Search Q1 FY21/22 Summary
2. Use of Force Q1 FY21/22 Summary

James Morgan**Superintendent****Head of City Police Task Force & Head of Contact**

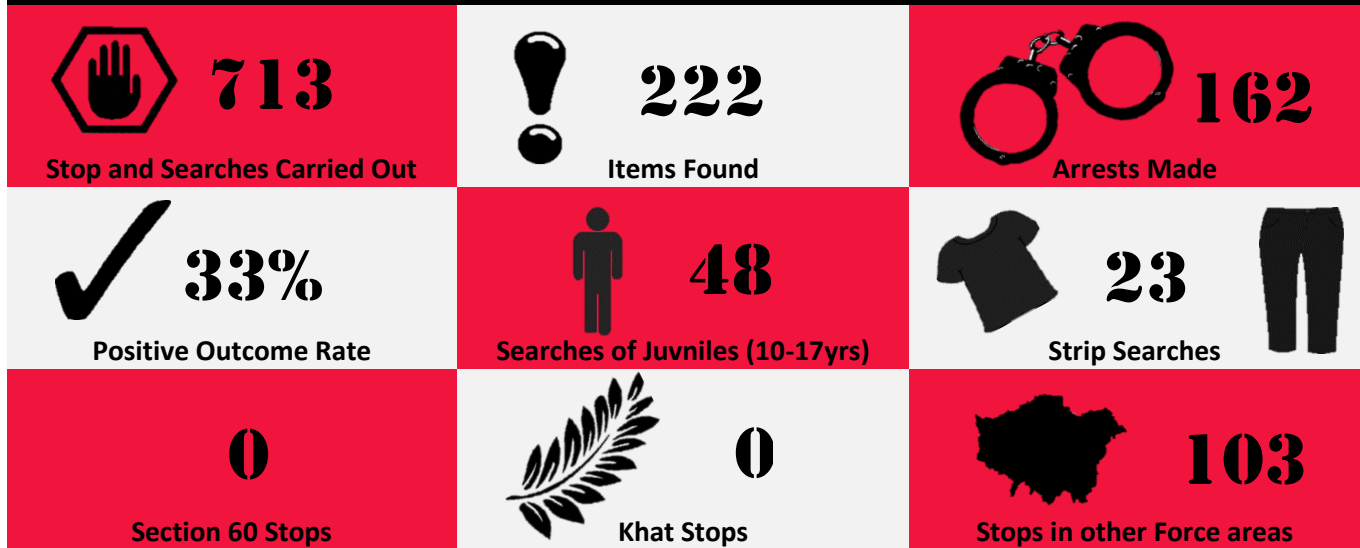
T: 020 7601 2102

E: james.morgan@cityoflondon.police.uk

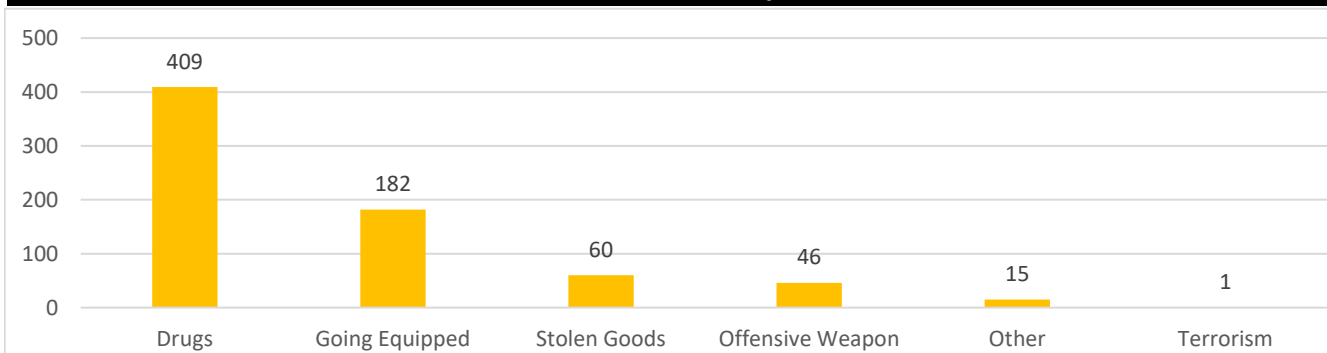
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Stop and Search Summary

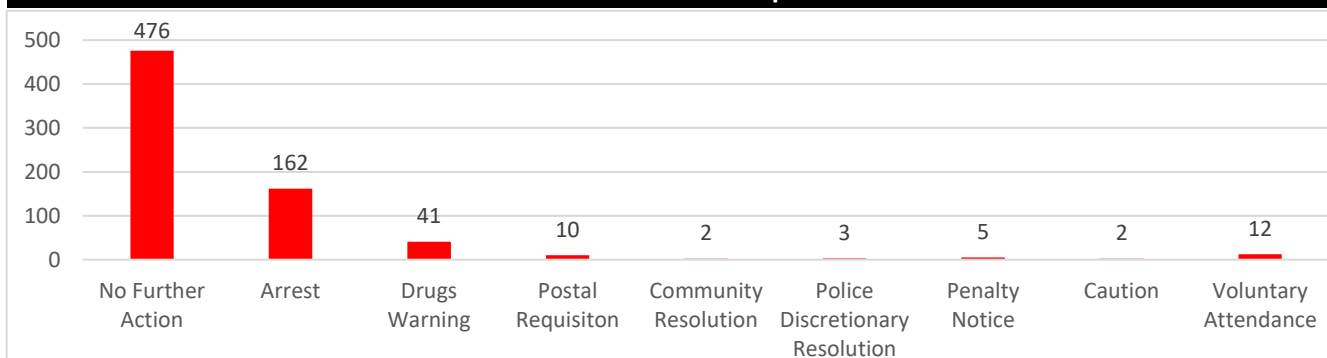
Q2 2021/22 (1st July 2021 - 30th September 2021)



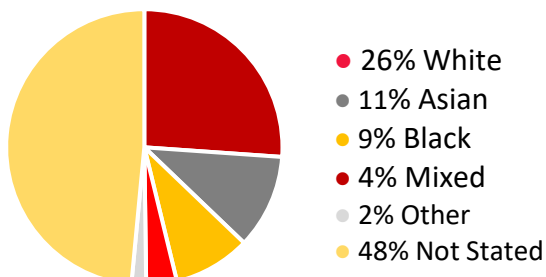
Reason for Stop



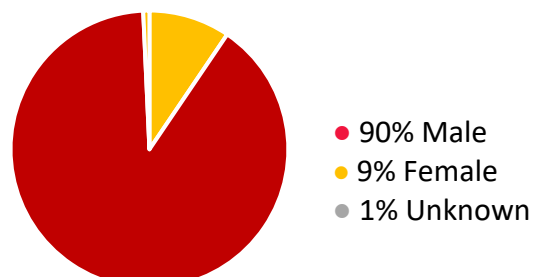
Outcome of Stop



Subject Self Defined Ethnicity



Subject Gender



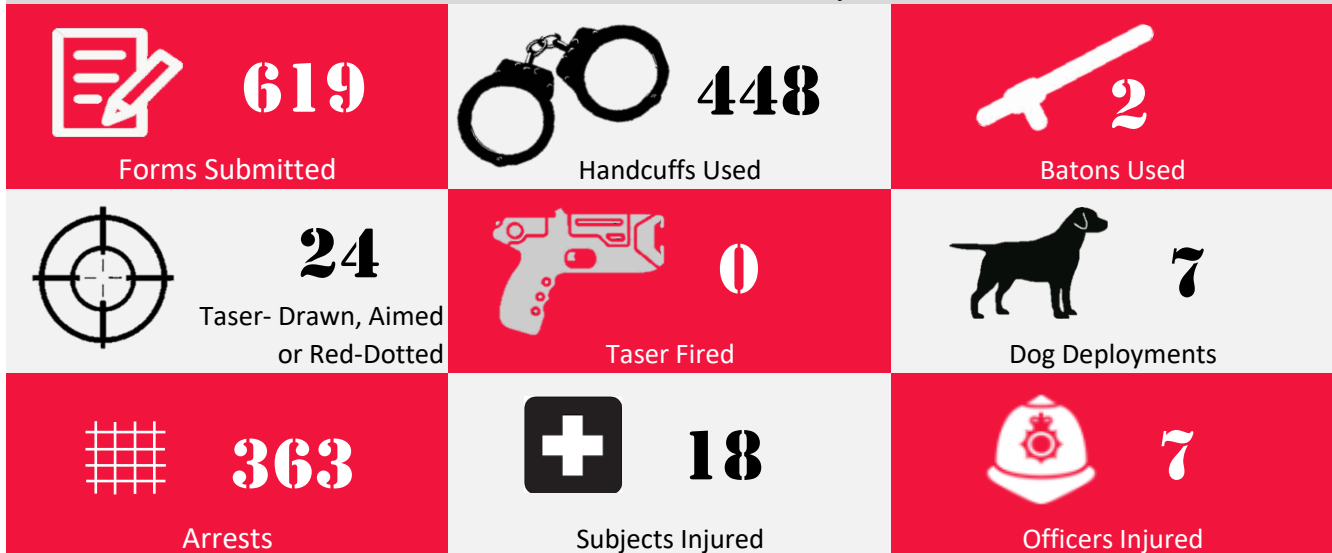
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Use of Force Summary

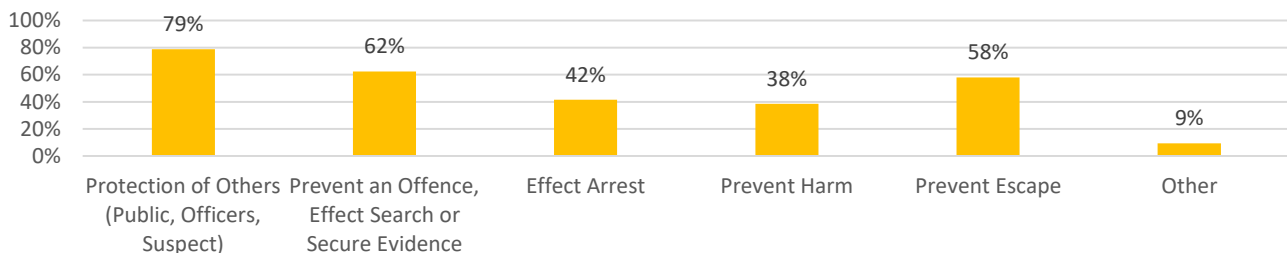
Q2 2021/22 (1st July - 30th September 2021)

This summary provides an insight into the number of submitted use of force forms.

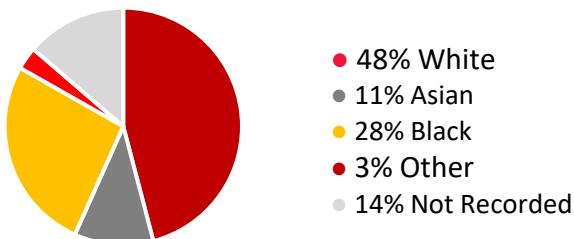
More than one form can be submitted for an incident if multiple officers are involved. Each form can also include multiple reasons for the use of force and/or multiple tactics. Details of the subject on the forms submitted will be duplicated due to these repetitions. Therefore the below are an indication of the content of the forms themselves and are not a reflection of the exact number of incidents or subjects.



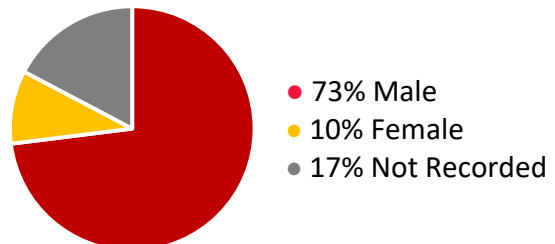
Reason for Use of Force (% of all forms)



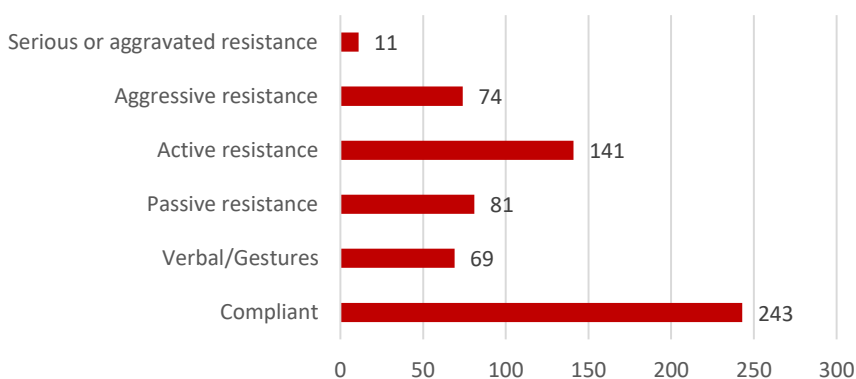
Subject Ethnicity



Subject Gender



Conduct of Subject



18%

of forms involved subjects believed to have mental health issues

5%

of forms involved juveniles

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

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

CITY OF LONDON POLICE: OFFICIAL

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

Annex A: glossary of terms

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

to the IOPC following a supervised investigation.

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

Investigation outcomes:

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

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

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

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

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

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

Misconduct: A breach of the Standards of Professional Behaviour

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

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

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

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

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

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

Unsatisfactory Performance Procedures

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

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

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

Police Terminology

AA: Appropriate Authority

ANPR: Automatic Number Plate Recognition

ATOC: (Association of Train Operating Companies) agreements.

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

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

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

BWV : Body Worn Video

CAD: Computer Aided Dispatch

CCJ: County Court Judgement

DPS: Directorate Professional Standards (Metropolitan Police Service)

DSI: Death or Serious Injury

ECD: Economic Crime Directorate

FI: Financial Investigator

HCP: Health Care Professionals

I&I: Intelligence and Information Directorate

IOPC: Independent Office of Police Conduct

MIT: Major Investigation Team

MPS: Metropolitan Police Service

NFA: No Further Action

NUT: National Union of Teachers

PCO: Public Carriage Office

PHV: Private Hire Vehicle

PMS: Property Management System

PNC: Police National Computer

POCA: Proceeds of Crime Act

SAR: Subject Access Request

SAR: Suspicious Activity Report

SIO: Senior Investigating Officer

SOP: Standard Operating Procedure

STOT: Safer Transport Operations Team

TFG: Tactical Firearms Group

TfL: Transport for London

TPH: Taxi and Private Hire

UNIFI: City of London Crime and Intelligence
Database

UPD: Unformed Policing Directorate

IC Codes:

IC1 – White – North European

IC2 – Dark European

IC3 – Black

IC4 – (South) Asian

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

IC6 – Arabic or North African

IC9 – Unknown

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