



Professional Standards & Integrity (Police) Committee

Date: FRIDAY, 18 FEBRUARY 2022
Time: 2.00 pm
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members:

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

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

Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:
<https://youtu.be/Vla9Y-p1gXs>

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. **PUBLIC MINUTES**

To agree the public minutes and non-public summary of the meeting held on 5th November 2021.

For Decision
(Pages 5 - 10)

4. **PUBLIC REFERENCES**

Joint Report of the Town Clerk and the Commissioner of the City of London Police.

For Information
(Pages 11 - 12)

5. **Q3 STOP AND SEARCH AND USE OF FORCE UPDATE**

Report of the Commissioner of the City of London Police.

For Information
(Pages 13 - 24)

6. **EQUALITY AND INCLUSION UPDATE**

Report of the Commissioner of the City of London Police.

For Information
(Pages 25 - 42)

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

Report of the Commissioner of the City of London Police.

To be read in conjunction with ITEM 15 (Non-Public) Appendix B - Integrity Dashboard – February 2022.

For Information
(Pages 43 - 52)

8. **UPDATE ON VIOLENCE AGAINST WOMEN AND GIRLS (VAWG) ACTIVITY**

Report of the Commissioner of the City of London Police.

For Information
(Pages 53 - 62)

9. **ACTION FRAUD STATISTICS- QUARTER 3- 1ST OCTOBER 2021- 31ST DECEMBER 2021**

Report of the Commissioner of the City of London Police.

For Information
(Pages 63 - 78)

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

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

12. **EXCLUSION OF THE PUBLIC**

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

For Decision

13. **NON-PUBLIC MINUTES**

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

For Decision
(Pages 79 - 84)

14. **NON-PUBLIC REFERENCES**

Joint Report of the Town Clerk and the Commissioner of the City of London Police.

For Information
(Pages 85 - 86)

15. **NON-PUBLIC APPENDIX TO ITEM 7 (INTEGRITY AND CODE OF ETHICS UPDATE) - INTEGRITY DASHBOARD - FEBRUARY 2022**

Report of the Commissioner of the City of London Police.

To be read in conjunction with ITEM 7 (Integrity and Code of Ethics Update)

For Information
(Pages 87 - 100)

16. **PROFESSIONAL STANDARDS STATISTICS - QUARTER 3 - 1ST OCT 2021 - 31ST DEC 2021**

Report of the Commissioner of the City of London Police.

For Information
(Pages 101 - 120)

17. **PCR CASE SUMMARY**

Report of the Commissioner of the City of London Police.

For Information
(Pages 121 - 122)

- a) Case dealt with under Complaint and Conduct Regulations 2019 (Pages 123 - 124)
- b) Case dealt with under Complaint and Conduct Regulations 2019 (Pages 125 - 126)
- c) Case dealt with under Complaint and Conduct Regulations 2019 (Pages 127 - 130)
- d) Case dealt with under Complaint and Conduct Regulations 2019 (Pages 131 - 134)

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 & INTEGRITY (POLICE) COMMITTEE Friday, 5 November 2021

Draft Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Friday, 5 November 2021 at 10.00 am

Present

Members:

Caroline Addy (Chair)
Mary Durcan
Alderman Professor Emma Edhem
Helen Fentimen
Alice Ripley (External Member)

Observers

Tijs Broeke
Michael Mitchell

Officers:

Ian Dyson

Hayley Williams
Rebecca Riggs
Simon Latham
Dermont Robinson
Rob Atkin
Rebecca Caldicott
Claire Creswell
Ian Younger
James Morgan
Rachael Waldron
Polly Dunn
John Cater

- Commissioner of the City of London Police
- City of London Police
- City of London Police
- Town Clerk's Department
- City of London Police
- City of London Police
- City of London Police
- City of London Police
- City of London Police
- City of London Police
- Town Clerk's Department
- Town Clerk's Department
- Town Clerk's Department

1. APOLOGIES

Apologies were received from Deborah Oliver, Nick Bensted-Smith, Tijs Broeke, Michael Mitchell, and Deputy James Thomson.

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 and summary of the meeting held on 8 September 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.

COMPLETED – 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.

IN PROGRESS – Unfortunately, the next ISB meeting has been set for 10th 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.

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.

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.

COMPLETED - 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

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.

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.

COMPLETED - an update on this is included in the Q2 update on the agenda

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.

RESOLVED – that the Committee noted the Report.

6. Q2 STOP AND SEARCH UPDATE

The Committee received a Report of the Commissioner of the City of London Police concerning stop and search data for Q2.

In response to the query that arose at the last meeting of the Committee concerning recording keeping around the frequency of specific individuals being stopped and searched, officers confirmed that a record is made of every search of an individual (in accordance with legislation), however the way the Record Management System is structured means that a laborious manual search of the records would be required to identify individuals subjected to a repeat stop in the City of London: this would require significant resources and so will not be pursued. Nationally, there were three forces in England and Wales that are able to report on this as their Record Management System is designed for this. However, it should be pointed out that none of these Forces share their data across county/jurisdictional borders, so an ability to glean any wider patterns is currently unavailable.

. It was also pointed out that a full picture on the frequency of stops would only be possible if Forces across England and Wales shared their data. CoLP has raised this point with the national working group on Stop and Searches. Further routine updates on this query will not be provided, however, any shift in in this area nationally would be reported back to the Committee,.

In response to a query, officers confirmed that Police actions relating to the Extinction Rebellion protests in August and September were included in the Q2 figures. Whilst full analysis was still required, there had been, over Q2, an uptick in Section 1 Searches which is believed to relate directly to the protests. Officers would provide a further analysis in the Q3 Update.

In relation to Use of Force, and response to a separate query, officers confirmed that, whilst there had been no significant injuries amongst the 18 cases that were reported across Q2, a fuller analysis would be provided in the Q3 Report. It was also pointed out that if serious injuries occurred, they would

be drawn to Members' attention in a timely manner and would have been subject to a Professional Standards investigation.

RESOLVED – that the Committee noted the Report.

7. **INTEGRITY AND ETHICS UPDATE**

The Committee heard an update from the Commissioner regarding Integrity and Ethics.

RESOLVED – that the Committee noted the update.

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 8 September 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. **PROFESSIONAL STANDARDS STATISTICS Q2: JULY - SEPTEMBER 2021**

The Committee received a report of the Commissioner regarding Professional Standards Statistics Q2: July – September 2021.

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

The Committee received a report of the Commissioner regarding Action Fraud Statistics Q2: July – September 2021.

16. **ANNUAL ETHICAL PARTNERSHIPS UPDATE**

The Committee received a report of the Commissioner regarding an Annual Ethical Partnerships Update.

17. **POLICE COMPLAINTS INFORMATION BULLETIN ANNUAL DATA**
The Committee received a report of the Independent Office of Police Conduct regarding Police Complaints Information Bulletin Annual Data.
18. **COLP - HISTORICAL SEXUAL MISCONDUCT**
The Committee received a report of the Commissioner regarding COLP – Historical Sexual Misconduct.
19. **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
- 19a **Case dealt with under Complaint and Conduct Regulations 2019**
Members considered cases dealt with under Complaint and Conduct Regulations 2019.
- 19b **Case dealt with under Complaint and Conduct Regulations 2019**
Members considered cases dealt with under Complaint and Conduct Regulations 2019.
- 19c **Case dealt with under Complaint and Conduct Regulations 2019**
Members considered cases dealt with under Complaint and Conduct Regulations 2019.
- 19d **Case dealt with under Complaint and Conduct Regulations 2019**
Members considered cases dealt with under Complaint and Conduct Regulations 2019.
20. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions in non-public session.
21. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There was no urgent business in non-public session.

The meeting ended at 11.45 am

Chair

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

This page is intentionally left blank

PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

PUBLIC OUTSTANDING REFERENCES

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.	Deputy Director, PSD	Complete —The ISB Dashboard is included as an appendix for info with the item on this on the agenda.
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 —This is still a work in progress. The new Head of HR for Attraction, Recruitment, Promotion and E&I only took up post in January 2022, this post had been vacant since July 2021. With the slowdown of recruitment and with the demand of three promotion boards and the National Uplift, the Attraction Strategy is something that is being worked on, but it has had to be re-prioritised owing to the other

PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

				demands on the team The aim is to have the Attraction Strategy written (at least the first draft) by the end of February. This will be heavily linked to the Recruitment Strategy which HR is also working on concurrently.
8/2021/P	5 November 2021 Item 6 – Q2 Stop and Search Update	In response to a query, officers confirmed that Police actions relating to the Extinction Rebellion protests in August and September were included in the Q2 figures. Whilst full analysis was still required, there had been, over Q2, an uptick in Section 1 Searches which relate directly to the protests. Officers would provide a further analysis in the Q3 Update. In response to a separate query, officers confirmed that, whilst there had been no significant injuries amongst the 18 cases that were reported across Q2, a fuller analysis would be provided in the Q3 Report. It was also pointed out that if serious injuries occurred, they would be drawn to Members' attention in a timely manner.	Commissioner	Complete- These points have been addressed in the Stop and Search update on the agenda.

Committee(s): Professional Standards and Integrity Committee	Dated: 18 February 2022
Subject: Q3 Stop and Search and Use of Force 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 13-22	For Information
Report author: Superintendent James Morgan, Head of City Police Task Force & Head of Contact	

Summary

Members will recall that due to the date of the Home Office data extract, there is limited analytical capability and the full Stop/Search and Use of Force cannot be prepared in time for this Committee cycle. Summary reports are attached, and a headline analysis is provided below.

There is a noticeable decrease in both Stop/Search and Use of Force reporting over this quarter which cannot be attributed to the introduction of 'Plan B' measures in early December. The positive outcome rate for Stop/Search increased compared to the last quarter to 37% (up 4%): we believe that protest in London and Glasgow (where officers were deployed for COP26) exerted a similar affect in relation to 'going equipped' searches as that noted during Q2.

The disproportionality index in relation to black members of the community increased for both Stop/Search (2.2) and Use of Force (2.58) in Q2, above the rolling average over the last two years (2.0 for Stop/Search and 2.2 for Use of Force). The reason for this is not clear, and we continue to examine the records: we will report in detail on this in our next report.

Handcuffing remains the most common type of force used during this quarter (in line with established trends). We also saw a decrease in the overall number of times Taser was deployed, but an increase in the number of discharges (1 this quarter compared to none in Q2). There has been a small decrease in subjects injured as a result of force being used, with a corresponding (small) increase in the number of officers being spat at during this quarter.

In terms of matters arising from you previous meeting, we have provided a detailed analysis of subjects recording as having been injured as a result of force being used against them in Q2, and there are no causes for concern (all relate to minor injuries, the majority minor discomfort etc as a result of handcuffing). We have also provided

an analysis of the impact of protest during August and September on Q2 stop/search trends.

Recommendation

Members are asked to note the report

Main Report

Background

1. As Members are aware, the timing of the quarterly data return to the Home Office clashes with this committee cycle and due to limited analytical capacity the Force currently has, the full analysis reports are not available to circulate with this report: the summary reports are attached. We have provided initial analysis based on those summaries and included (where appropriate) more detailed analysis on the Q2 data from work conducted since your last meeting.
2. Whilst the positive outcome rate for Stop/Search remains in line with the established trend, and up on previous quarters, the overall number of stop/search records is down. As is the number of Use of Force records and this cannot be attributed to the implementation of Plan B measures in December 2021. Disproportionality affecting black members of the community was up in Q2 for both Stop/Search and Use of Force, and above the rolling average: the cause of this is not yet known and is subject to further analysis by the Force.

Current Position – Stop Search

3. The overall number of Stop and Searches during this quarter is down on the previous quarter by 14%. The reason for this is not immediately clear: whilst November was broadly consistent with the average number of stops per month both October and December where down. Stop and Searches during December do not align with the announcement of Plan B measures: in other words, there is no correlation between the announcement of Plan B and a reduction in Stop and Search. It is possible that officer nervousness about the risk the Omicron variant posed to their own health influenced consideration of the use of this tactic, but there is no evidence in the data or anecdotal evidence to suggest this and the Police Officers actively discount this as the reason for this trend.
4. However, whilst the overall number of stops is down the positive outcome rate has increased to 37% (up 4% on Q2); this includes an increase of 3% (to 34%) for positive find rates, and an increase of 4% (to 27%) for arrests stemming from Stop and Searches (Members are reminded that a positive find does not automatically lead to an arrest which is why these measures do not align).
5. In line with the established trend, searches for drugs under the Misuse of Drugs Act continue to account for the majority of Stop and Searches (50%). The largest group of searches relate to 'Going Equipped' (21%). As with the Q2 data, this period covers a significant period of protest activity within London and nationally, and it is likely that the policing of this activity is (at least in part) driving this trend.

6. Of note, 166 searches (17%) took place outside the Force area. This is slightly higher than Q2 but reflects the deployment of officers to both Scotland in support of the COP26 conference and the Force's contribution to policing concurrent protest in greater London during that period, which was significant.
7. The gender split for subjects of Stop and Search remains static compared to Q2. The self-defined ethnicity split also remains broadly similar, with a slight increase (26% in Q2, 29% in Q3) in subjects identifying as white. The percentage of subjects who self-identified as black remains the same at 9%, although those who identify as Asian decreased from 11% (Q2) to 8% (Q3). The percentage who declined to self-define their ethnicity remained broadly the same (48% in Q2, 49% in Q3).
8. This headline data suggests that the disproportionality index should be broadly consistent with Q2. In Q2 we saw a slight increase in the disproportionality for black individuals from 1.9 to 2.2 (increase of 0.3). By contrast the disproportionality in the MPS force area is 4.3. This increase takes the force above the rolling 12 month average of 2.0. It is not immediately clear what drove this increase, and the Force will conduct further analysis of the Q2 and Q3 data (once the full report is available for Q3) to understand and address the underlying driver for this change.
9. **Thematic Review – Offensive Weapons.** A thematic review of stops focused on offensive weapons during Q2 has been conducted since the Committee's last meeting, which was something Members showed a specific interest in. A total of 46 records related to records where the object of the search was an Offensive Weapon, with 20% of the records reviewed. Where available Body Worn Video (BWV) was reviewed, and the written record was reviewed in all cases. Clear grounds for the search were recorded in all records reviewed, and in the instances where BWV was available the elements of 'GOWISELY' (the key pieces of information an officer is required to give to a subject prior to searching them) were covered in clear, easy to understand language.
10. The review identified some instances of good practise, especially where officers have had intelligence of a weapon prior to the stop and they have intervened with an appropriate level of force, but rapidly de-escalated and established a good rapport with the subject.
11. The review did highlight an administrative issue which has been fed back into individual officers and team briefings. BWV recordings of Stop/Search encounters are not, routinely, retained beyond 30 days unless the officer flags it as evidential (retained for 7 years) or as a 'Resented Stop/Search' (13 months). In a number of cases officers had indicated recordings were saved but had not appropriately classified the footage as Evidential etc, meaning the recording had automatically been deleted. No adverse outcomes were identified as a result of this administrative irregularity.
12. The next phase of HMICFRS dip sampling of Stop/Search records is about to commence. The last review placed the Force very near the top of the national lead table with over 90% of grounds assessed as valid. We await the outcome of the

latest national review and will report on these in our next report (if available by then).

Current Position – Use of Force

13. The noticeable decrease in Use of Force reported to you in Q2 has been further investigated, and it is now apparent that a technical issue affected a number of reports which meant they were not included in the totals. This has now been addressed, and whilst the overall number of reports has increased, it has not altered against the key measures in a statistically significant way.
14. In Q3 we continue to see a slight downwards trend in total use of force reporting (accounting for the reports not previously included in the Q2 data): this equated to a 3% reduction from the (adjusted) Q2 data to Q3. As with Stop and Search records, this does not correlate with the announcement of Plan B. Records in October and December were down compared to the monthly average whilst in November records were broadly in line with the trend. However, when compared year-on-year, we are seeing a higher frequency of Use of Force reporting in 21/22, compared to 20/21. This is almost certainly reflective of the increasingly stringent COVID restrictions in place during Q3 20/21, which included the period of lockdown 2. However, compared to Q3 19/20, the year on year trend is down.
15. Handcuffing continues to account for the majority of use of force records: 510 in Q3, 498 in Q2. Taser use overall is down from Q2 (31 in Q2, 18 in Q3): however in Q3 there has been 1 instance of Taser being discharged compared to none in Q2: this followed an incident where a vehicle failed to stop for an Armed Response Vehicle. As with all uses of Taser, this will be reviewed by the Lead Taser Instructors and any learning fed back into the training cycle. At the time of writing, there has been no complaint about this incident.
16. The number of subjects injured as a result of Use of Force is down slightly from 18 (Q2) to 13 (Q3). A full analysis of the Q2 data is given below as was requested at your previous Committee. None of the incidents where an injury to the subject has been recorded have been flagged as serious or requiring further investigation, and is very probable that a similar trend to that seen in Q2 will be seen in the Q3 data (see below for details of the Q2 data). Conversely, we saw a slight increase in officers being spat at over this period, with 11 officers subjected to this sort of assault compared to 7 in Q2.
17. The gender split of subjects that force was used against, is broadly the same as Q2 (75% male in Q3, 73% male in Q2). The officer-defined ethnicity has shown some movement, with 53% of subjects defined as white, and 23% as black in Q3; compared with 48% and 28% respectively in Q2. It is not possible to speculate on how this will affect the disproportionality index, although the variations are unlikely to be statistically significant. As with Stop/Search, during Q2 the disproportionality index for black subjects rose above the 2 year rolling average. In Q2 the index was 2.58; the two-year average is 2.2 (for Asian individuals, by contrast the index was 0.84, which is the rolling two year average).

18. Of the 704 Use of Force records from Q3 38 involved under 18s (5%): including one record where a Taser was deployed and the subject red-dotted. Without a line-by-line examination it is not possible to comment in any detail on these records. However, Members will recall that we provided a detailed examination of the records of Use of Force involving under 18s over Q1 and Q2 in our last report. Over the first two quarters of the year these reports accounted for 4% of the total number of reports, so the Q3 data represents a slight (but not statistically significant) increase. In Q1 and Q2 the majority of use of force against U18s involved 16 and 17 year olds. Across the first two quarters of the year, the under 18 cohort was broadly in line with the main cohort except with the involvement of a weapon, which was three times more likely in the under 18 cohort. We would expect the Q3 data to indicate a similar trend and will report in our Q4 report if that is not the case.

Matters arising from previous PSI Meeting

19. **Briefing Sessions for Members.** A further Stop/Search briefing session for Members had to be postponed before Christmas due to operational demands: this will be rescheduled during Q4. A series of Use of Force briefing sessions have started to be delivered to Members, and these will be followed with opportunities for members to attend Officer Safety and Public Order Training; and a bespoke session on Taser training.

20. **Injuries arising from Use of Force.** At the Committee's last meeting, members asked for confirmation that none of the subjects who force was used against, and records indicated that they had suffered injuries during Q2 and Q3, had suffered serious injury. The records of each of these incidents (including Body Worn Video) have been reviewed.

21. Of these records, 8 (61%) involved subjects who offered active or passive resistance only 2 involved subjects who were compliant. All of the records indicate only Minor injuries, and all bar 3 (or 76%) were seen by medical professionals. The vast majority of incidents involved only the use of tactical communications and handcuffing. Six records (46%) involved unarmed tactics (restraints etc); two involved Taser (one red-dot; one discharge) and one incident each involved limb restraints and one ground restraint.

22. Officers were assaulted in 3 incidents recorded during this period.

23. In almost all incidents the subject stated that they had soreness or minor scratches as a result of being handcuffed. In a small number of cases, minor injuries (grazes) were experienced as a result of the subject being taken to or falling to the floor whilst resisting arrest. In one incident the subject stated (after being handcuffed) that they had previously broken their arm and couldn't flex sufficiently: the officers immediately changed the handcuff position. In a final incident, the subject complained of an ankle injury: they were taken to hospital for an X-Ray which indicated nothing more serious than a sprain. No medication was prescribed.

24. As noted by former Assistant Commissioner Sutherland during the last committee meeting, if any serious injuries had occurred these would have been referred to,

and investigated by, the Professional Standards Dept at the time. None of these incidents would have triggered a Professional Standards referral and following the examination of the records none are of concern.

25. **Effect of Protest on Q2 Stop/Search trends.** At your last meeting, it was noted that there was a spike in searches under s1 PACE during Q2. Our working assumption was that this was driven by the significant protest activity in the City at the end of August and beginning of September. We undertook to examine this further. We do not have the resources to individually examine every record in this period but we have dip sampled a number of records and examined the trend through August into September.
26. The period of protest (linked to Extinction Rebellion) covered the period 22 Aug 21 to 5 Sep 21. For August and September as a whole there was 197 Stop/Searches under s1 PACE; during the two weeks of protest there were 80, representing 41% of the total for those two months. Examining reasons for those stops, during the period of protest 44 searches were conducted for articles to be used in criminal damage. This accounts for 55% of searches during that period. By contrast, over August and September as a whole there were 57 searches for articles to be used in criminal damage, representing only 29% of searches under s1 PACE.
27. Put in a slightly different context, the s1 PACE searches conducted during the two weeks of protest activity account for 77% of all such searches over August and September. This strongly indicates that protest activity was the driver for the increase in s1 PACE searches noted in the Q2 data. This is confirmed by the (limited) dip sampling of the search records over this period.
28. **New Dip Sampling Regime.** Since the Committee's last meeting the Force has introduced a revised process for the dip sampling of Stop/Search records and BWV recordings. Currently in a pilot phase just within Local Policing (which accounts for 95% of the Force's stop/search records), the new process will involve all supervisors from Sergeant to Chief Superintendent reviewing a random selection of stop/searches every month. We had hoped to have some initial data to report to the Committee on this process, but technical challenges in generating the report required to allow supervisors to begin the review process has delayed its implementation.
29. Once those issues are resolved we intend to report on the themes identified through this process in our future quarterly reports. Our intention is to extend the same process to Use of Force in due course, however as Use of Force recordings do not automatically generate a unique reference number more work is required to confirm the business process. We anticipate having the pilot of the review of Use of Force records in place before your next meeting (although there may not be any data to report at that stage).

Conclusion

30. The quality of our stop/search encounters (based on dip sampling and the positive outcome rate) remains high. The ongoing HMICFRS national dip sampling exercise will provide us with independent assurance on this, together with the

additional internal scrutiny processes introduced this quarter, and the external scrutiny provided by this Committee and the Independent Advisory and Scrutiny Group.

31. The reasons for the increase in the disproportionality affecting black individuals is not understood and is subject to further review and analysis by the Force leads: we will report on this further in our next report. Similarly, the dip in overall Stop/Search and Use of Force records this quarter has no clear driver and this will continue to be monitored by the Force and reported to this Committee in subsequent meetings.

Appendices

1. Stop/Search Q3 FY21/22 summary report
2. Use of Force Q3 FY21/22 summary report

James Morgan

Superintendent

Head of City Police Task Force & Head of Contact

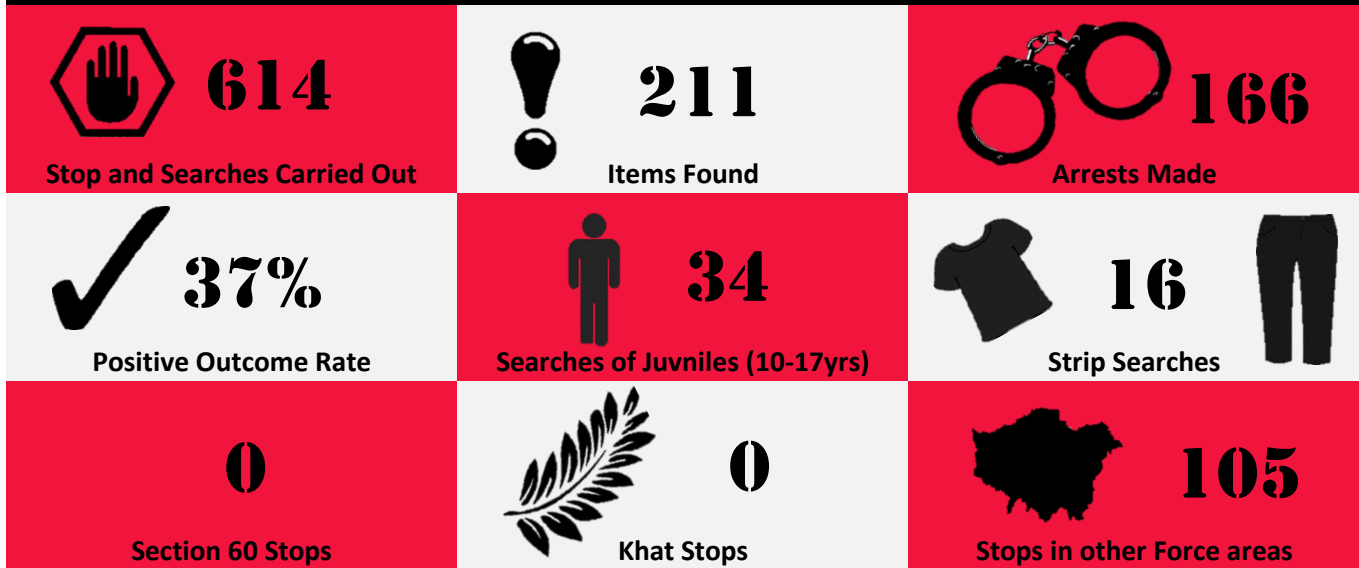
T: 020 7601 2102

E: james.morgan@cityoflondon.police.uk

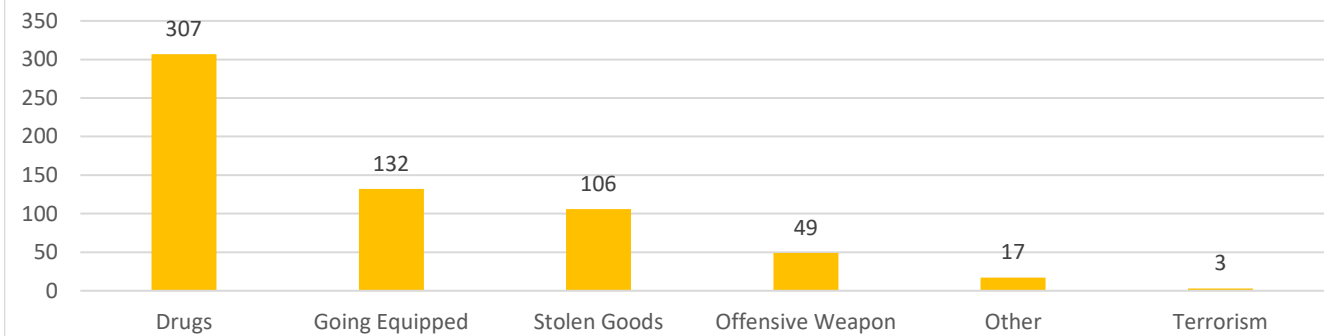
This page is intentionally left blank

Stop and Search Summary

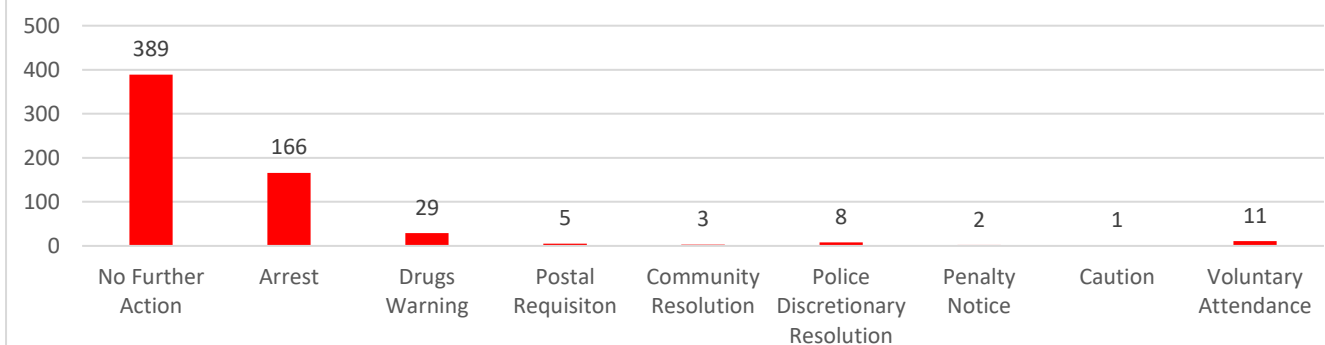
Q3 2021/22 (1st October - 31st December 2021)



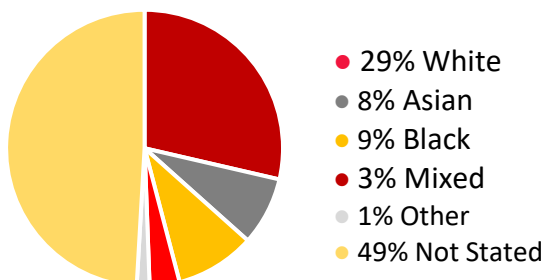
Reason for Stop



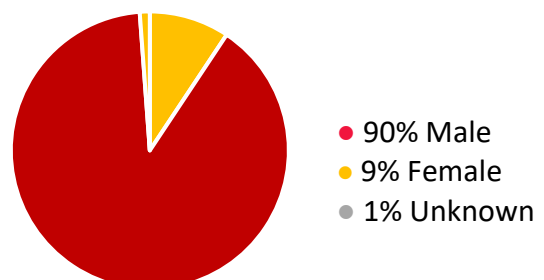
Outcome of Stop



Subject Self Defined Ethnicity



Subject Gender

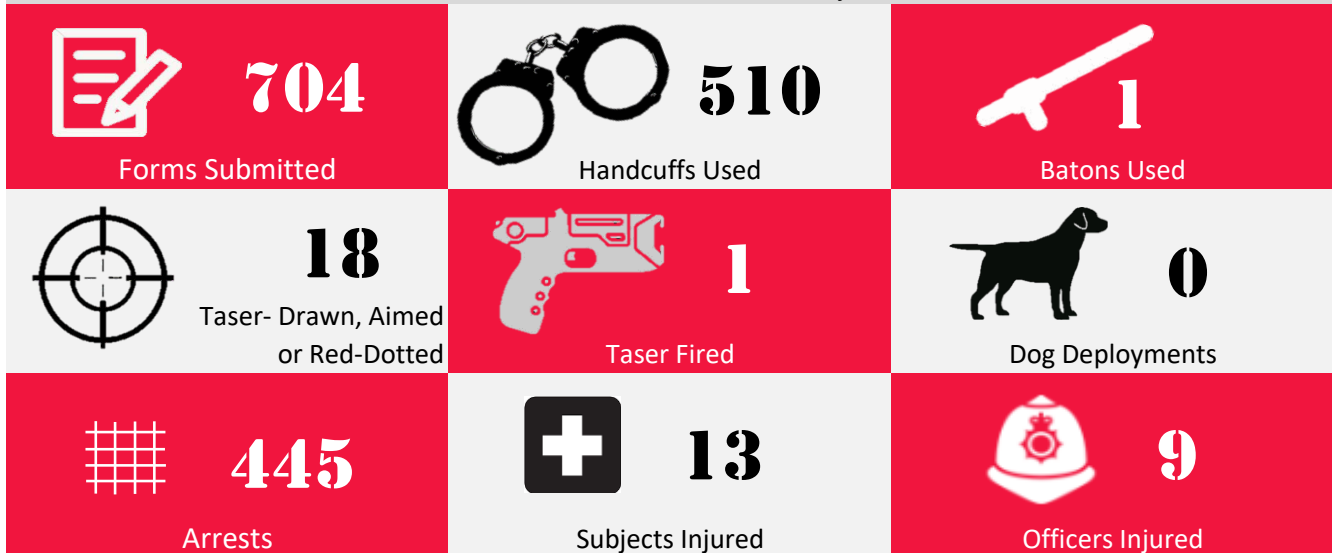


This page is intentionally left blank

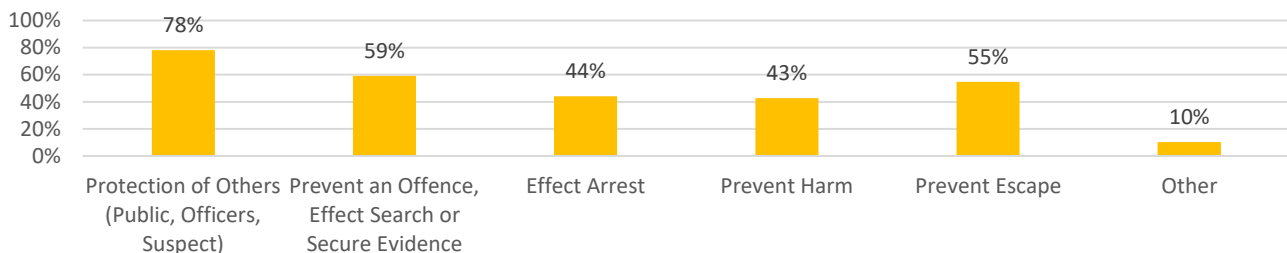
Use of Force Summary

Q3 2021/22 (1st October - 31st December 2021)

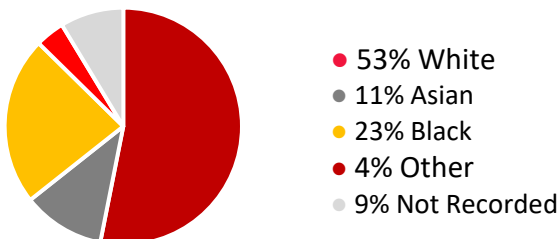
This summary provides an insight into the number of submitted use of force forms. More than one form can be submitted for an incident if multiple officers are involved. Each form can also include multiple reasons for the use of force and/or multiple tactics. Details of the subject on the forms submitted 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.



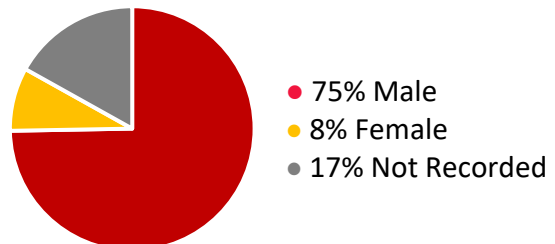
Reason for Use of Force (% of all forms)



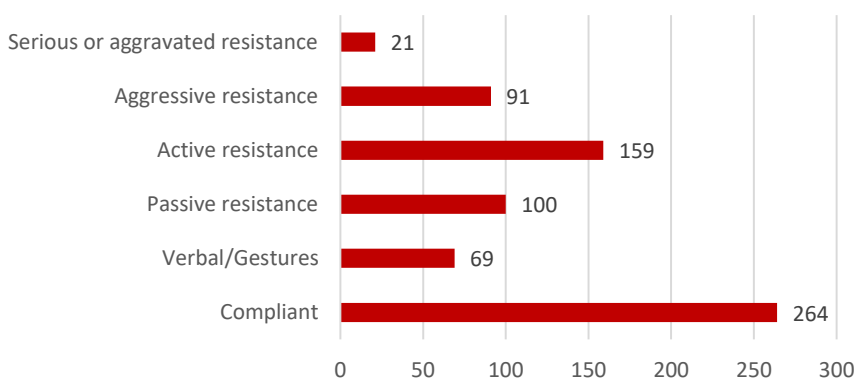
Subject Ethnicity



Subject Gender



Conduct of Subject



18%

of forms involved subjects believed to have mental health issues

5%

of forms involved juveniles

This page is intentionally left blank

Committee(s): Professional Standards and Integrity Committee	Dated: 18 February 2022
Subject: Equality and Inclusion Update	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 14-22	For Information
Report author: David Cleverley, Strategic Development	

Summary

Members will recall the Equality and Inclusion Strategy and Plan, originally submitted to your November 2020 Committee for information.

This report provides a further update on the latest position regarding activity supporting the delivery of the plan to that provided to your last Professional Standards and Integrity Committee (PSIC) in November 2021.

As presented in November 2021, a consolidated delivery plan which is split into themes, each with a senior lead, has been developed, detail of progress against the consolidated plan is appended to this report at Appendix A.

The cover report includes highlights and details of proposed success measures or KPIs for Equality and Inclusion, for Members' information and feedback on these proposed measures is welcome.

Recommendation(s)

It is recommended that Members note the report.

Main Report

Background

1. At the previous Committee in November 2021, it was requested that a consolidated workstream action plan be presented to Members at the next Committee. The action plan is being managed and tracked via the workstream update pack (Appendix A) which shows the priority focus areas with target dates, progress on actions since the previous update, and key next steps being updated.

2. As requested by the Chair of the Police Authority Board previously. The actions in the Appendix represent a *consolidated plan* for all current actions outstanding for the National Police Chiefs Council (NPCC) Equality & Inclusion (E&I) plan, the Police Authority Board (PAB) recommendations, the Tackling Racism Taskforce (TRTF) recommendations, the Black and Minority Ethnic (BAME) action plan, and the Lesbian, Gay, Bi-sexual and Transgender + (LGBT+) action plan. The plan is arranged in cross cutting workstreams, and the plan slides are regularly updated for internal and external review and scrutiny.

Current Position

3. Since your last Committee in November 2021, Commissioner McLaren is now in position is the strategic lead for the E&I programme along with T/Commander Blackburn continuing to lead the delivery at a tactical level. We are currently undertaking a review of workstream leads and will provide a further update on any changes as part of a future update.
4. The Recruitment and Onboarding workstream has now been merged with the Learning and Development workstream under the leadership of the HR Director. The merged workstream has been named Recruitment, Development, and Progression and will be responsible for all elements of recruitment, onboarding, training, transfer, and promotion.
5. The Commissioner has received a draft report following the internal BAME survey and is working through the findings with Black, Asian, and Minority Ethnic colleagues and support networks with a view to responding in the near future with actions.
6. Highlights of work since the November update include:
 - a. On 14 January we commenced our recruitment and outreach campaign for our September recruitment of 30 officers. We have reviewed our advertising strategy to ensure we are making the best use of social media and other channels, particularly aimed at attracting a diverse pool.
 - b. We are commencing a month of intense outreach where serving members of the service are going to a range of venues over a 4-week period. This will include targeted education establishments, places of worship, shopping centres and high footfall areas and events.
 - c. We have recruited recruitment ambassadors from serving staff that will buddy with applicants and support them through the recruitment process. We have also invested in several positive action interventions to support candidates from under-represented groups throughout the process. We will continue to report to Police Authority Board in respect of the progress of the recruitment campaign over the coming months.
 - d. Provisional funding has been agreed to commence the forces annual Values, Standards, and Ethics workshops and work has commenced between the Head of Learning & Organisational Development (L&OD), Culture workstream lead, and the forces recently appointed Ethics Lead.

- e. CoLP is now signed up to the MIND charity 6 standards of Mental Health proactivity in the workplace which is an NPCC commitment. 12 Mental Health first aiders have now received training including 6 from CoLP and 6 from the City of London Corporation. In addition, our Wellness Zone in Bishopsgate station has now launched.
- f. We are awaiting peer review of our Oscar Kilo¹ submission which will assist in planning our future actions in the health and wellbeing workstream for continued improvement
- g. The Joint Schools Digital Project (CoLP, CoLC, Amazon, Crime Stoppers, CyberHub Trust) launched on 13/01/2022; a series of workshops will cover the impacts of social media. 43 students across 5 schools enrolled. The CoLP Workshop is on 26/01/2022, introducing young people to careers in technology and the Police. The Project will culminate on 29/03/2022, with students providing a presentation.
- h. The CoLP Volunteer Cadet Unit (VPC) now has a cohort of 27 cadets (11 male/16 female – 66% B.A.M.E) aged between 13-18 years old, and is gaining National attention/recognition working alongside officers and staff
- i. Plans are underway to introduce a Youth Independent Advisory Group (YIAG), which will be administered by the Partnership and Prevention Hub (P&P Hub). The YIAG will consist of a cohort of members between 13-19 years of age, who live, work or who are educated within the City of London. The purpose of the YIAG will be as a conduit between CoLP and Young People for views, opinions, lived experiences and scrutinise on matters affecting policing/National priority areas (i.e. Stop and Search, Use of Force).
- j. Coinciding with the National Police Chiefs' Council's Neighbourhood Policing Week of Action, Cluster Panels launched on 20/01/2021
- k. Op Illuminate (Christmas Campaign) ran throughout November and December. Engagement activity included increased visible patrols in high footfall/hotspot areas, Safety Hubs in partnership with CoLC, St. Johns Ambulance and Victim Support, joint patrols with the Metropolitan Police Service and British Transport Police, and joint taskings with Park Guard. There were 82 stop searches, 43 arrests, and 70 licensed premises visits linked to the campaign. When considering theft, Robbery, ASB, Public Order and Sexual offences, there was a 23% decrease in crime when compared to the 7-week period immediately prior
- l. CoLC and CoLP worked with the Home Office to welcome over 450 Afghan refugees to the City, housed at two locations within the square mile. Dedicated Ward Officers (DWOs) visit the locations regularly and engage with the refugees, staff and Charity workers

¹ [Oscar Kilo • Evidence Base & Best Practice for Emergency Services Wellbeing](#)

- m. IASG recommended following their observations of the recent promotion processes further support for officers in relation to leadership and presentation skills training. L&OD have developed several courses which can assist in this (Appendix B)
- n. Mentivity pilot #1 has been delivered and very well received with high levels of engagement. The second of the pilot sessions is booked for Feb 2022 and delivery to student officers and tutor constables in March 2022 (Mentivity provide a BAME perspective input on police interaction and stop search. They are a mentoring organisation for young people)

Impact

- 7. We have undertaken a review of how we measure progress and success against our E&I strategy and have compiled the following draft list of KPI measures for review by the committee. These are aligned to the new Policing Plan 22-25. We welcome any comments prior to formalising and producing a dashboard that will be provided for review at future committees.

Workstream	Overview of activity	Success measures
Community Engagement	Increasing our legitimacy & confidence within communities through active engagement with all communities. Increasing confidence by effective response to hate crime & scrutiny of police power such as stop and search	1.Community confidence & satisfaction measures through surveying victims of crime & the wider community 2. Sampling of stop & search & use of force incidents by our independent Advisory Scrutiny Group % graded as good & excellent v those requiring improvement 3. Number & breadth of community events attended each month and proactive communications out to communities
Recruitment Development & Progression	Building a diverse workforce in tune with London including people from black & minority communities, women, and LGBT. Ensuring we develop our workforce to achieve their potential and be the very best for the community. We will strive to improve our representation of underrepresented groups at all levels of the organisation & in specialist roles.	1.To recruit 40% of visible ethnic minority student officers in each new intake 2.Per year we improve our representation of visible ethnic minority employees by 3.23% 3. Increasing number of employees from a black minority background successful at promotion processes 4.The total number of new joiners to CoLP each year is at least 51% female to achieve an overall increase of 2.6% per year of female representation across the service 5. Per year to improve 0.35% employees from a LGBT background
Culture & Leadership	Work to build leadership capability across the force and build a workforce culture that it is truly inclusive & embeds our diversity & inclusion ambitions at all levels of the force. A workplace which people are proud of & one where COLP is an employer of choice.	1.Our staff engagement score through surveying over the next 3 years increases Scores specifically relating to feelings of inclusion, leadership & culture related responses 2. 100% of eligible workforce having attended annual values, standards & ethics inputs by 03/23 3. No of staff members engaged in external attachments & CPD events/ support to voluntary organisations (+ direction of travel)
Wellbeing	Taking a proactive and preventative approach to workforce wellbeing, as well as intervening at	1. Specific staff survey questions in relation to feelings of well-being to improve over the 3 years

	the earliest opportunity to help protect our people & increase productivity	2. Op Hampshire 75% outcome rate for assaults and hate crime committed towards staff
Retention & Exiting	Ensuring that the service retains talent particularly from under-represented groups. Exploit opportunities for entry & re-entry at different levels & specialisms into the service. Understand why staff are exiting the service & use insight & data to improve retention.	1. Line managers to offer an exit interview to all those intending to leave – Target of 100% 2. The % exit interviews completed officers and staff 3. Retention rates over the next 3 years (excluding retirements, transferees & ill health) are improved against the 2021 baseline 4. % of leavers that are contacted by COLP within 12 months in respect of opportunities to re-join 5. Retention – Black, Asian and Minority Ethnic staff Black, Asian & minority ethnic attrition rates for voluntary leavers are equal to or better than the rates for non-Black, Asian and Minority Ethnic colleagues (xx% the baseline figure now) 6. Retention female staff - female attrition rates for voluntary leavers are equal to or better than the rates for male leavers (xx% baseline)

Corporate & Strategic Implications

8. 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.
9. Financial implications – none.
10. Resource implications – none.
11. Legal implications – none.
12. Risk implications – none.
13. 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.
14. Climate implications – none.
15. 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.
- Appendix B- Response to issues raised by the IASG regarding promotion processes.

Contact:

David Cleverley

Project Manager

Equality and Inclusion

Strategic Development

City of London Police

David.cleverley@cityoflondon.police.uk

Workstream	Leadership & Culture	Owner	Ch Supt Transform	Date	01/02/22	Project RAG		Benefit RAG	TBD
------------	----------------------	-------	-------------------	------	----------	-------------	--	-------------	-----

Workstream objectives	Priority Deliverables
<ul style="list-style-type: none"> Leaders to ensure they create an inclusive culture within the organisation Create a culture where people feel confident to share their protected characteristics Encourage leaders to continuously improve their approach to inclusivity and ensure learning is regular and ongoing Develop a framework of champions and senior leaders to drive forward CoLP's E&I agenda and work with internal and external partners to promote activity Recognise and reward good work and bravery across E&I Undertake annual workforce surveys Further develop consultation and feedback mechanisms that enable all staff to take part in broad organisational decision making Scope partnership and secondment opportunities outside the organisation to enhance and build new skills in leaders 	Key Deliverable / Key Performance Indicator
	Target Date
	Launch mandatory Values, Standards and Ethics sessions
	Q2/22
	KPI: 100% of eligible staff have attended their annual V, S & E input
	03/23
	Develop an E&I secondment framework for leaders / volunteers
	Q3 22
	KPI: Number of staff members engaged in external secondments / support to voluntary organisations (positive direction of travel)
	Q2 23
	KPI: Annual Staff Survey - positive direction of travel for leadership & culture related responses
	Q2 23
	Develop and launch a comms strategy with calendar of events
	01/22
	Complete a data bias review and recommendations
	03/22
	Introduce an annual E&I award as part of future event
	07/22
	Further develop Diversity Allies Scheme
	Q3 2022

Key performance measures

- Our staff engagement score through surveying over the next 3 years increases. Scores specifically relating to feelings of inclusion, leadership & culture related responses
- 100% of eligible workforce having attended annual values, standards & ethics inputs by 03/23
- No of staff members engaged in external attachments & CPD events/ support to voluntary organisations (+ direction of travel)

Workstream	Leadership & Culture	Owner	Ch Supt Transform	Date	01/02/22	Project RAG		Benefit RAG	TBD
Progress since last update				Key next steps					
<ul style="list-style-type: none"> A high-level culture roadmap has been agreed. This reinforces the role of CoLP's leadership programme in promoting E&I Data bias working group has met several times to agree key issues and a future plan Force has agreed broad attendance at the College of Policing's national data ethics workshop Work has commenced between the strand lead, Head of L&OD and CoLP's recently appointed Force Ethics Lead, to scope the content and format of the force's mandatory Values, Standards and Ethics sessions Provisional funding has been agreed to introduce Values, Standards & Ethics inputs during FY 2022/23 				<ul style="list-style-type: none"> Finalise E&I video and launch internally / externally across social media platforms E&I conference to take place before the end of Q1 2022 - to outline the progress CoLP has made and next steps. This will be a core part of force comms strategy Develop framework for annual Values, Standards and Ethics workshops and agree funding Review CoLP's existing external secondment process and look at opportunities for both short and long term secondments for leaders to develop skills Formalise data bias work within existing force governance structure Finalise plan for CoLP's annual E&I award 					
Recommendations to Operational Delivery Board				Decisions required by Operational Delivery Board					
To consider detailed funding arrangements for Values, Standards and Ethics inputs				To approve funding arrangements for Values, Standards and Ethics inputs					

Workstream

Health and Wellbeing

Owner

Ch Supt Local Policing

Date

01/02/22

Project RAG

Benefit RAG

Workstream objectives

- 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. **11/21 this now occurs upon the induction course from L&OD**
- Develop a local plan that incorporates Health and Safety, Wellbeing and Fulfilment **09/21 Wellbeing strategy written and launch reviewed annually – Reviewed re published Jan 22**
- Ensure CoLP leaders are equipped to deal with Mental Health difficulties **11/21 but ongoing L&OD include this within the various leadership courses that are run.**
- Implement wellbeing initiatives to improve peoples quality of life whilst at work **09/21 this is an ongoing piece with monthly calendar set up to update teams of the activities**
- Focus on staffs mental health and embed supportive and preventative policies and initiatives **01/22 This work is ongoing MIND sign up through NPCC 6 pledges**
- Review current HR policies to ensure the maximum support is given to all staff with protected characteristics- **06/22 This work is ongoing**
- Ensure teams supporting our Occ Health are trained in issues around inclusion and diversity- - **09/21Complete and Ongoing as they are a separate unit they do receive training from their providers with diversity sand inclusion.**

Key Deliverable / Key Performance Indicator

Launch a Buddy Scheme for all new joiners (completed) on going all new students receive the buddy scheme including Police Now candidates.

Review strategy on Health and Wellbeing (completed and published)

Oskar Kilo recommendations and planning

60 MH first aiders to be trained and launched

Launch Wellness Zone in Bishopsgate (COMPLETE)

MH at work commitment MIND CHARITY

Target Date

ongoing

02/22

06/22

06/22

11/21

06/22

Key performance measures

1. Specific staff survey questions in relation to feelings of well being to improve over the 3 years

2. Op Hampshire 75% outcome rate for assaults and hate crime committed towards staff

Workstream	Health and Wellbeing	Owner	Ch Supt Local Policing	Date	01/02/22	Project RAG		Benefit RAG	
Progress since last update				Key next steps					
<ul style="list-style-type: none"> Oskar Kilo self assessment framework completed, delay in the original feedback, process has now changed and we as a Force await a Peer review from a appointed force to allow the feedback to be received. Force now signed up to the MIND charity 6 standards of MH proactivity in the work place which is a NPCC commitment. MPS consulted to join and support their Long Covid support group. They have refused to allow the CoLP to join. Federation consulted re the appetite for a force lead initiative, Federation have indicated there is no need for such a support group. Hampshire (officer/staff assaults and hate crime)protocols re established and re launched MH first aiders 12 delegates have received training 6 from CoLP 6 from Corporation Wellbeing strategy annual review completed , re written and re published to reflect our progress KPI – This will be measured from the feedback from the Oscar Kilo self assessment and the action plan from this and now once the Mind self assessment is completed this will show progress and then allow an action plan to be completed. 				<ul style="list-style-type: none"> Await peer review from Oskar Kilo self assessment framework this will create action and delivery plan on areas of improvement. This has been delayed due to a change in process or review by the NPCC and OK. First Launch MH first aiders 12 trained further courses proposed to be conducted in February. Continuation of coffee engagement events and collaboration with key stakeholders such as Police Mutual, Police care UK etc. Next force coffee engagement event planned for Mid February, quarterly programme to be continued throughout 2022. 					
Recommendations to Operational Delivery Board				Decisions required by Operational Delivery Board					
None at this stage.				None.					

Workstream

Community engagement

Owner

Ch Supt HQ

Date

01/02/22

Project RAG

Benefit RAG

Workstream objectives

- Establish a Silver Group to lead on community engagement E&I activity including outreach and attraction for recruitment
- Host community based outreach sessions for engagement and recruitment
- Establish longer term engagement with schools and colleges in order to attract and nurture future talent and introduce young people to policing
- Work with local strategic partners to develop a shared data set that will allow for a better understanding of the communities we serve
- Utilise data sets to better inform and identify areas of disproportionality and the negative impact on local communities
- Engage in a calendar of events with the local community to promote good relations
- Identify and engage with diverse communities to address possible adverse perceptions of the police service so that satisfactions levels improve across all communities
- Undertake meaningful involvement and consultation with local communities to review such tools as Stop and Search and Use of Force
- Evolve our force to be culturally competent to deliver legitimate and meaningful community policing

Priority Deliverables

Key Deliverable / Key Performance Indicator	Target Date
Commence recruitment outreach plan	In progress
Map city communities / key individuals, calendar of engagement events	Completed
Launch inaugural 12 week schools project across the city	Completed
Set proposed key performance indicators for activity	Completed
Launch community based cluster panels	Completed
Pilot LGBT+ advisor network	Completed

Key performance measures

Police Community Encounters – Use of Powers

1. Dip sampling of key police community encounters (stop and search / use of force / Road Traffic stops/ Firearms stops - internal senior officer dip sampling:

i. Number sampled past month

ii. Number identified with learning

iii. Number identified as best practice

2. IASG feedback on key police encounters stop and search / use of force / Road Traffic stops / firearms stops.

i. Number sampled / observed past month

ii. Number identified with learning

iii. Number identified as best practice

Community confidence / victim surveying measures

1. Confident & satisfied with City of London Police Actions

2. Reducing the BAME & Gender satisfaction gap in survey data

Number of community events attended

1. Number of community events attended over the last month

2. Outreach recruitment events expression of interest by ethnicity & gender

Workstream	Community engagement	Owner	Ch Supt HQ	Date	01/02/22	Project RAG		Benefit RAG	
Progress since last update				Key next steps					
<p>Page 36</p> <ul style="list-style-type: none"> The Joint Schools Digital Project (CoLP, CoLC, Amazon, Crime Stoppers, CyberHub Trust) launched on 13/01/2022; a series of workshops will cover the impacts of social media. 43 students across 5 schools enrolled. The CoLP Workshop is on 26/01/2022, introducing young people to careers in technology and the Police. The Project will culminate on 29/03/2022, with students providing a presentation. Project Outreach seeks to support and drive the current CoLP recruitment campaign (live until 14/02/2022). Officers will attend high footfall, diverse areas to directly engage and answer any questions on the application process with personable approach. The CoLP Volunteer Cadet Unit (VPC) now has a cohort of 27 cadets (11 male/16 female – 66% B.A.M.E) aged between 13-18 years old, and is gaining National attention/recognition working alongside officers and staff. Plans are underway to introduce a Youth Independent Advisory Group (YIAG), which will be administered by the Partnership and Prevention Hub (P&P Hub). The YIAG will consist of a cohort of members between 13-19 YOA who live, work or whom are educated within the City of London. The purpose of the YIAG will be as a conduit between CoLP and Young People for views, opinions, lived experiences and scrutinise on matters affecting policing/National priority areas (i.e. Stop and Search, Use of Force). The Strategic Research & Analysis Unit have produced a CoLP Community Profile –pulling together data from various sources to provide a picture of the various groups within the City of London and map its diverse communities. This profile will be continually updated. Further, the Operational Planning Team have produced a calendar of City Events in 2022 assisting with planning our engagement activity. Coinciding with the National Police Chiefs' Council's Neighbourhood Policing Week of Action, Cluster Panels launched on 20/01/2021. Op Illuminate (Christmas Campaign) ran throughout November and December. Engagement activity included increased visible patrols in high footfall/hotspot areas, Safety Hubs in partnership with CoLC, St. Johns Ambulance and Victim Support, joint patrols with the Metropolitan Police Service and British Transport Police, and joint taskings with Park Guard. There were 82 stop searches, 43 arrests, and 70 licensed premises visits linked to the campaign. When considering theft, Robbery, ASB, Public Order and Sexual offences, there was a 23% decrease in crime when compared to the 7 week period immediately prior. CoLC and CoLP worked with the Home Office to welcome over 450 Afghan refugees to the City, housed at two locations within the Square mile. Dedicated Ward Officers (DWOs) visit the locations regularly and engage with the refugees, staff and Charity workers as part of their routine patrols. There has also been additional joint patrols with CoLC to afford reassurance across the local community. 				<ul style="list-style-type: none"> Continue to map communities using latest available datasets (e.g. Census data - 2022) to accurately reflect the current picture within the City. Plan to engage young people better through a structured schools programme/series of inputs linked to the PHSE curriculum, and raise awareness/offer diversion. Inputs could cover a whole range of issues and risks in line with CoLP vision/strategies, including ASB, violence against women and girls, and county lines. Continue to develop Nextdoor membership (social media platform) to update residents on local policing activity. In 2021, 743 new residents joined (101% increase from 2020), and the team helped the community stay connected and updated on the latest local news and insights by sharing 232 posts. Further, posts reached a total of 5942 residents, received 59 reactions, and 35 comments. Launch mobile Digital Signage Screens Project, to display matters of public interest related to the prevention of crime in high footfall areas/Business footprints. Plan a Summer Force Open Day/Engagement and Insight Event. 					
Recommendations to Operational Delivery Board				Decisions required by Operational Delivery Board					
None at this stage.				None.					

Workstream

Retention and Exiting

Owner

T/DCS Bradford

Date

01/02/22

Project RAG

Benefit RAG

Workstream objectives

The workstream objectives have been re-ordered according to the chronology of the “leaving process” and aligned to the references in the wider plan.

- Undertake a review of what roles within the organisation could most benefit from **greater flexibility** in staff entering and exiting (#48)
- Ensure **policies and procedures** are in place to identify why staff with protected characteristics leave the service (#7)
- Undertake a **review of process** for exit from service procedures (#44)
- Undertake a **full review of retention/leaving data** (#22)
- Widely **readvertise re-joining** options (#47)
- Utilise positive action principles to **proactively contact** BAME officers and staff within two years of them exiting the organisation to encourage them to return (#38)
- Consider **national policies** to allow exit and re-entry into the organisation (#45)

- KPI objectives are required** for the two stages –
- Stage 1** is before the person has actually left the organisation
- Stage 2** is after the person has left the organisation.

Priority Deliverables

Description

Date

Agree a new process map for our exiting employee journey

31/02/22

Set retention and exiting KPIs for line managers and targets across our protected characteristics

28/02/22

Key performance measures

1. Line managers to offer an exit interview to all those intending to leave – Target of 100%

2. The % exit interviews completed officers and staff

3. Retention rates over the next 3 years (excluding retirements, transferees & ill health) are improved against the 2021 baseline

4. % of leavers that are contacted by COLP within 12 months in respect of opportunities to re-join

5. Retention – Black, Asian and Minority Ethnic staff:
Black, Asian & minority ethnic attrition rates for voluntary leavers are equal to or better than the rates for non Black, Asian and Minority Ethnic colleagues (xx% the baseline figure now)

6. Retention – female staff :
Female attrition rates for voluntary leavers are equal to or better than the rates for male leavers (xx% baseline)

Page 37

37

Workstream	Retention and Exiting	Owner	T/DCS Bradford	Date	01/02/22	Project RAG		Benefit RAG	
Progress since last update				Key next steps					
<ul style="list-style-type: none"> High-level strategic ambitions and a plan-on-a-page have been created for this workstream. The workstream objectives have been re-ordered according to the chronology of the “leaving process” and aligned to the references in the wider plan. Relative prioritisation given to #44 review of process and #7 policy in an attempt to drive improvement in the subsequent areas. The process map of “as is” and “to be” have been created and we are undertaking a refresh plus consultation with Networks to ensure they capture the changes needed. 				<ul style="list-style-type: none"> Draft KPI’s for stage 1 and stage 2 have been created and require workshopping to ensure appropriate consultation has taken place. An HR SPOC has been identified to assist with data requirements from across the force. Research with “other” forces is underway to seek existing good practice. An interim process for recontacting recent leavers (#38) is being considered. 					
Recommendations to Operational Delivery Board				Decisions required by Operational Delivery Board					
None at this stage.				None.					

Workstream	Recruitment, Onboarding and L&OD	Owner	Director of HR	Date	01/02/22	Project RAG		Benefit RAG	
------------	----------------------------------	-------	----------------	------	----------	-------------	--	-------------	--

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 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
	Aspirational targets have been agreed by E&I board	Complete
	Review our recruitment and attraction structure and people	Complete
	Review promotion processes end to end	Ongoing
	Cultural Workshop- Agreement next steps / outcomes	19 Jan 22
	Reverse Mentoring	13 Jan 22
	Community Engagement plan for PEQF	March 2022
	PALs cohort 2 launch	March 2022
	Pilot of Mentivity Training #2	Feb 2022

Key performance measures
<ol style="list-style-type: none"> To recruit 40% of visible ethnic minority student officers in each new intake Per year we improve our representation of visible ethnic minority employees by 3.23% Increasing number of employees from a black minority background successful at promotion processes The total number of new joiners to CoLP each year is at least 51% female to achieve an overall increase of 2.6% per year of female representation across the service Per year to improve 0.35% employees from a LGBT background

Page 40

Workstream	Recruitment, Onboarding and L&OD	Owner	Director of HR	Date	01/02/22	Project RAG		Benefit RAG	
Progress since last update						Key next steps			
<ul style="list-style-type: none">The Head of Attraction, Recruitment and Promotion has started in postAn interim Recruitment Specialist whose focus will be supporting the uplift via student officer and Transferee recruitment has joined HR Services. This contract is for the period of the Uplift programme. A number of HR colleagues attended an event hosted by the uplift team which looked at attracting underrepresented groups to policing. The student officer campaign opened on the 17th January and targeted attraction work has begun in the form of outreach teams in the community, social media campaigns, and webinar to assist candidates who are looking to apply. We have launched the buddies scheme with 16 officers volunteering to support our applicants through the recruitment process. For under represented groups this support will be 1:2 or 1:2 depending on overall numbers at the end of the campaign.Aspirational recruitment targets have been agreed by EI Board in relation to gender, BAME and LGBT+ communityWe have secured the services of a Positive Action Trainer who will support those applicants from under represented groups through the application and selection stage for student officersReviewing the entry criteria for student officers to ensure we are accessible to all that have the ability and desire to become an officerWork is continuing on the Recruitment Website which unfortunately has been delayed due to staff absences within both HR and Media this is to be completed by early 2022IASG recommended following their observations of the recent promotion processes further support for officers in relation to leadership and presentation skills training. L&OD have developed a number of courses which can assist in thisFollowing further feedback from the IASG on last years promotion processes we will incorporate into a briefing for selection panels the explanation why operational competence needs to be tested as part of the promotion process in line with APP and College of Policing criteriaMentivity pilot #1 has been delivered and very well received with high levels of engagement. The second of the pilot sessions is booked for Feb 2022 and delivery to student officers and tutor constables in March 2022 (Mentivity provide a BAME perspective input on police interaction and stop search. They are a mentoring organisation for young people)ALS debrief report has been received and the recommendations are being included as part of the planning for the next cohortCommunity engagement strategy for Student officers includes visits with a selection of the City business and the residential community alongside community policing. Student officers also will deliver the Mini Police lesson to their local schools or community groupsLeadership Development strategy to be presented to CoT by the Organisation Development Team for directionA video stream has been created for all Focus on sessions a number of the diversity series have been uploaded, this is now available on the Intranet for all staff to accessInformation regarding the support networks available is now included on the induction coursesL&OD are currently creating a modular Training Programme to encapsulate values, ethics, equity and belonging. A draft proposal has been produced and is ready for circulation for comment.						<ul style="list-style-type: none">HR and operational colleagues are attending training with the College of Policing in regards to paper sifting student officer applicationsExternal recruitment is beginning to increase due to the previous slow down of recruitment, this will require the team to look at different ways to attract officers from other forcesThere is a review due to take place, this will also take into account new standardised recruitment processes for all forces as led by the College of Policing looking at the end to end promotion process for police officersFollowing review of the IASG feedback regarding promotion processes, operational assessment and candidate readiness a meeting to be arranged to discuss further with the IASGFurther work to be completed on the Recruitment WebsiteCollate feedback from Mentivity pilots and consideration to be given to force wide deliveryReverse mentors to be matched to mentees and scheme to commence at end of JanuaryFuture of Leadership Development Programme to be scoped prior to presentation at CoT meetingAssess success of Mini Police delivery by Student officers and consider role out of opportunity to all officers to encourage community engagementTo discuss way forward with culture and leadership development with new CoTL&OD to circulate paper for initial comment following meeting with Supt Shaw (taking place 27/01) and to undertake fuller scoping of costs involved.			
Recommendations to Operational Delivery Board					Decisions required by Operational Delivery Board				
None at this stage; to be added once Mentivity and Mini police pilots conclude					None				



Subject: IASG Recommendations Response

Report of: Julia Perera (HR Director)

Document Classification: Official

For Information/Decision: Information

Please see the below update following the feedback that we received on some of our recent promotion processes. Three themes were raised.

Point 1: Operational Competence

The IASG felt that some officers had not had exposure to operational situations and were therefore unable to demonstrate their operational readiness. The IASG questioned whether this should form part of the promotion process as many roles within policing may not require these skills therefore preventing some officers from passing the promotion boards.

Having reviewed this recommendation within the report submitted by the IASG HR and a Senior Operational Officer will meet with the IASG in order to explain the APP process and highlight the importance of assessing an officer's operational capability as they are being promoted to a rank and not a specific role. The operational competence part of the assessment brings together a number of different elements that a particular rank would likely be required to deal with at any one time. Many forces have moved to this way of assessment and going forward the College of Policing are reviewing promotion processes to look at standardisation nationally.

Point 2: Leadership Skills

The IASG recommended that leadership should be taught and that it should be explicitly tested in boards for Inspectors and above.

The police competency values framework allows skills such as leadership to be tested throughout the interview and operational assessment process without explicitly asking questions regarding their experience in leadership. However, as a force we currently offer the following:

Appendix B

Leadership:

- Leadership Development Programme
- Core Leadership Programme (this is a mandatory promotion course for all newly promoted Sergeants and Inspectors as mandated by the College for Policing)
- Management Development Programme
- The College of Policing Leadership Learning, which is aimed at different ranks, is something we heavily promote in force

The following initiatives are currently also being looked at:

- A toolkit to help officers prepare for the next rank

Point 3: Presentation Skills

The IASG observed that some officers were nervous or had lack of experience in undertaking presentations therefore they recommended that training should be offered to officers to support them in this skill. The force currently offers:

- Presentation Skills
- Assessment centre preparation workshops
- Positive Action master classes

The following initiatives are currently also being looked at:

- A presentation skills workshop for beginners

As with all courses that we provide they are reviewed periodically to ensure that they are providing the appropriate support and development required.

Additionally, as we do have independent observers at our promotion boards, so we intend to adjust the briefing slightly to the panels to incorporate for example point 1.

Committee(s): Professional Standards and Integrity Committee	Dated: 18 February 2022
Subject: Integrity and Code of Ethics 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 15-22	For Information
Report author: Deputy Director, PSD	

Summary

This report provides Members with an update of the work of the Force's Integrity Standards Board (ISB), regional and national activity of relevance, and an update on the Integrity Standards dashboard and the proposed delivery plan for 2022. The last update this Board received was a verbal update to your November Professional Standards and Integrity Committee (PSIC).

Recommendation

It is recommended that the Members note this report.

Main Report

Integrity Standards Board (ISB) - 10 November 2021

1. The last Force ISB meeting was held on the 10 November 2021 chaired by the Commissioner. The next meeting is scheduled for 8 February 2022, and it is not, therefore, possible to provide members with any details of that meeting in this report owing to the publication deadline.
2. At the November meeting the Force provided an update on performance and a general update on the Code of Ethics and future plans to build on existing work. It was noted that the Deputy Director, Professional Standards Department (PSD) was now the Force lead for Ethics following the retirement of the Head of Strategic Development.
3. The completion of separate Community & Victim Surveys was noted. It was noted that there was a reduction in the percentage of respondents who felt City of London Police officers would act with integrity, but no specific issues were commented on within the free text areas of the survey.

4. Although the number of respondents remains low, data shows a slight increase in satisfaction levels from victims who responded so far in both the areas of treatment received and overall satisfaction.
5. It was noted that, in general, survey return rates are lower than in previous years and that Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) is increasingly focusing on the results of victim surveys. Recent well reported incidents in the media have reinforced the importance of legitimacy, trust, and confidence in policing. The force will consider options for better engagement with victims of crime including the possibility of focus groups.
6. The number of grievances raised within the force continues to be lower than previous periods and the force had no new Employment tribunals submitted nor any tribunals held in the reporting period.
7. During the reporting period, 5 officers and 9 members of staff completed voluntary exit interviews on leaving the Force. None of the officers cited any Code of Ethics issues as being a reason for leaving the organisation. However, 3 members of staff have described these as being relevant to them leaving, specifically a lack of respect for their skills and a culture of criticism in some areas of the force. This information is being collated and feedback will be given to relevant departments and managers.
8. The Deputy Director of PSD updated that their role now includes the lead for Ethics & Integrity, taking over from the former Head of Strategic Development. The last City of London Police Challenge Panel was held in March 2021 and meetings are being planned for 2022 with the possibility of an external chair to support legitimacy and independence.

National & Regional Developments

9. The Code of Ethics is to undergo a national 2-year review by the College of Policing and follows a period of consultation to agree its scope. The review aims to ensure that the Code of Ethics creates an environment that supports everyone in policing and provides greater transparency to the public about decision making and standards.
10. The London Police Challenge Forum, of which CoLP had been active members and which had considered ethical dilemmas and issues across policing in London, has been disbanded, primarily due to restructuring within the Metropolitan Police Service (MPS) and the challenges of meeting during the Covid restrictions.
11. As a result, CoLP, MPS and British Transport Police (BTP) have joined the South-West regional structure, and this is now a Wales, West and London (WW&L) regional network which met recently in January 2022. Deputy Chief Constable Sam de Reya, Dorset Police, as Chair of the WW&L Police Ethics is the regional representative to the National Police Ethics Group. Considerations included the inclusion of Ethics Advisors in Force Gold Groups and the challenge faced by many forces of encouraging colleagues to raise ethical issues.

12. The CoLP Director of Information attended a national Data Ethics Workshop in January 2022. Data ethics studies and evaluation considerations relate to the collection, retention and use of data in order to formulate and support ethical outcomes. A data ethics session was held for Members in 2021, led by the CoLP Director of Information. Only 4 members of the PSIC attended and it was agreed with the Police Authority Team that the slide pack be circulated to the remaining Members of PSIC for their information. This was completed.

Integrity Development Plan, Dashboard and future work

13. All elements of the previous Integrity Development Plan were delivered or have been superseded by new objectives. A refreshed plan has been developed and is being presented to the Force ISB on the 8 February 2022. It is based on the *College of Policing - Organisational Model* (see Appendix A). As well as reflecting current College of Policing thinking, it is aligned with the HMICFRS inspection model, and it is hoped that this plan will more effectively integrate ethics into all areas of CoLP. It is presented for Members' information.
14. Assistant Commissioner Paul Betts is the new Chair of the Force Integrity Standards Board and is keen to reinvigorate and drive work forward. Members should note that the Plan is in development and the activity to deliver against the objectives is currently being scoped. There is still significant work to do in this regard with relevant business leads.
15. At a previous PSIC Committee, Members asked to see the ISB Dashboard that is scrutinised internally at Force level at the Force ISB, to gain a better understanding of the areas in which the Force challenged itself. The current Integrity Dashboard, to be submitted to the ISB on 8 February, is shown at Appendix B and is a Non-Public Appendix, as this is an internal Force document. It is presented for Members' information.
16. It is intended that CoLP Force Ethics Panels are to be reinvigorated to encourage debate and discussion, that consideration is given to the creation of Ethics Advisors who can more effectively embed the Code of Ethics into all areas of CoLP across operational strategic levels and that this work is fully integrated with the Force Equality & Inclusion strategy, in particular the Leadership and Culture strand.

Options

There are no options or proposals within this report.

Corporate & Strategic Implications

- Strategic implications – none.
- Financial implications – none.
- Resource implications – none.

- Legal implications – none.
- Risk implications – none.
- Equalities implications – none.
- Climate implications – none.
- Security implications – none.

Appendices

- Appendix A – Integrity Delivery Plan Summary – proposed February 2022
- Appendix B – Integrity Dashboard – February 2022

Ian Younger - Deputy Director – Professional Standards,
City of London Police T: 020 7601 2208
E:ian.younger@cityoflondon.police.uk

POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2022 (Proposed – Summary)



Appendix A

INTRODUCTION

This development and delivery plan has been produced to ensure that the City of London Police continues to discharge its obligations produced by the College of Policing and referred to as *The Code of Ethics – Organisational Model*

The Organisational Model lists the key considerations and activities that an organisation should consider to successfully embed the Code of Ethics to its fullest potential. The model demonstrates an aspiration of ethical policing and is cyclical in nature, requiring regular review.

The Organisational Model:

- illustrates what a 'model' force should have done and considered to embed the Code
- is an aspirational statement of what success looks like in the future
- clearly identifies the enablers to achieving continuous improvement

The Organisational Model is structured in accordance with the following headings:

1. Commit
2. Assess
3. Plan
4. Act
5. Monitor
6. Report.

Traffic Light Colour	
GREEN	Demonstrably achieved
AMBER	In Progress with actions to be completed
RED	No substantive progress and/or unlikely to be achieved

PLAN SUMMARY

1. Commit	Traffic Light Tracker			
	Jan 22	Apr 22	Aug 22	Dec 22
1.1 The Commissioner consistently reinforces the significance of the Code of Ethics.				
1.2 Everyone understands their roles, responsibilities, and expectations under the Code.				
1.3 Ethical values are externally and internally communicated.				

Appendix A

1.4 A statement of commitment to the Code is included in published policing plans.				
1.5 Senior leaders demonstrate how they have personally applied the Code.				
1.6 Supervisors and leaders facilitate and encourage professional decision making by their teams.				
1.7 The ability to use discretion to do the right thing is actively acknowledged and rewarded.				
1.8 Police staff associations and trade unions reinforce the significance of the Code and demonstrate examples of how they have applied it.				

2. Assess	Traffic Light Tracker			
	Jan 22	Apr 22	Aug 22	Dec 22
2.1 Risks are identified, monitored, and managed.				
2.2 Perceptions of fairness are a key consideration both internally and externally and could be measured using staff surveys.				
2.3 Everyone is empowered to challenge any perceived unprofessional behaviour by colleagues (including their supervisors and managers).				
2.4 Everyone has the confidence and the ability to seek guidance on ethical dilemmas.				
2.5 Policies, procedures and practices reflect the ability to use discretion and the need to do the right thing.				
2.6 The National Decision Model (NDM) is used as the preferred decision-making model.				
2.7 Everyone has the confidence to report unethical behaviour and knows how to do so.				

Appendix A

2.8 Internal governance structures appropriately reflect the new 'employer' status of chief constables.				
2.9 Recipients consider training to be realistic, practical, and engaging.				

3. Plan	Traffic Light Tracker			
	Jan 22	Apr 22	Aug 22	Dec 22
3.1 Responsibility for embedding the Code is aligned to a chief officer portfolio.				
3.2 Everyone receives information, training, and development opportunities to aid their understanding of the Code and how to apply it.				
3.3 CoLP makes use of professional assistance via the College of Policing and suitable academic institutions.				
3.4 An anti-corruption control strategy is in place.				
3.5 An evidence-based approach is used for embedding the Code.				

4. Act	Traffic Light Tracker			
	Jan 22	Apr 22	Aug 22	Dec 22
4.1 Leaders are engaged and accessible in relation to the Code, and frequently reinforce ethical policing.				
4.2 Leaders and supervisors seek opportunities to demonstrate and discuss ethical decision making.				
4.3 Ethical considerations underpin all decision making, which is transparent whenever possible.				
4.4 All training seeks opportunities to reinforce the Code and discuss ethical dilemmas.				

Appendix A

4.5 Recruitment, selection and promotion processes test and evidence ethical principles and standards, including a personal commitment to the Code.				
4.6 The organisation provides a range of methods that enables everyone to report unethical behaviour.				

5. Monitor	Traffic Light Tracker			
	Jan 22	Apr 22	Aug 22	Dec 22
5.1 Risk assessment should be a continuous process which adapts to meet changing conditions and mitigate emerging risks.				
5.2 Lessons are learnt where ethical decision making could be improved but blame is not attributed.				
5.3 Staff surveys are regularly conducted to monitor attitudes towards ethical policing, perceptions of leadership and confidence in disclosure and reporting mechanisms.				
5.4 Honest feedback on professional behaviour is sought by everyone; leaders in particular should be receptive to feedback and challenge.				
5.5 Ethics committees or other scrutiny mechanisms are established and should include members of the public.				
5.6 Internal investigations and complaints should be monitored for timeliness, proportionality, and effective outcomes.				

6. Report	Traffic Light Tracker			
	Jan 22	Apr 22	Aug 22	Dec 22
6.1 A published report demonstrates transparency in relation to how the organisation and people within it abide by the Code of Ethics.				

This page is intentionally left blank

Committee(s): Strategic Planning and Performance Committee Police Authority Board Professional Standards and Integrity Committee	Dated: 7 February 2022 16 February 2022 18 February 2022
Subject: Update on Violence against Women and Girls (VAWG) activity	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 12-22	For Information
Report author: DCS Rebecca Riggs; Chief Inspector Carly Humphrey (Leads for CoLP VAWG)	

Summary

The purpose of this report is to provide an update for Members of the Strategic Planning and Performance Committee (SPPC) and the Police Authority Board (PAB).

Further to the last report to your Committee and PAB in November 2021, this report details the strategic progress made by the City of London Police (CoLP) in relation to Violence Against Women and Girls (VAWG)¹, additionally it provides some examples of work completed, and also areas for development over the coming months.

The report details current work at National, Regional and Local level and a copy of the governance structure is attached at Appendix A.

The City of London Corporation has been consulted on this report and joint working is taking place on the national objective of 'Creating Safer Spaces' as detailed in Appendix B.

Recommendation(s)

Members are asked to note the report

¹ This document uses the following Home Office definition of VAWG: "The term 'violence against women and girls' refers to acts of violence or abuse that we know disproportionately affect women and girls. Crimes and behaviour covered by this term include rape and other sexual offences, domestic abuse, stalking, 'honour'-based abuse (including female genital mutilation, forced marriage, and 'honour' killings), as well as many others, including offences committed online."

Main Report

Background

1. Members will be aware of the national and local focus on VAWG and detail of the background to this report was fully described in the previous report to your Committee and PAB in November 2021.

Current Position

National

2. A clear direction has been set by the NPCC (National Police Chiefs Council) lead for VAWG, DCC Maggie Blyth. This has been communicated to all forces through national working groups and a launch of the NPCC National Framework for Delivery (Year 1) document for VAWG which was disseminated to all forces on the 17 December 2021. This current approach set, clearly supports HM Government's direction and policy on addressing VAWG.
3. The document sets out a broad delivery plan which is organised under three overarching objectives:
 1. Improving Trust and Confidence in Policing;
 2. Relentlessly Pursuing Perpetrators;
 3. Creating Safer Spaces.
3. All forces have been given a deadline of the 30 June 2022 to demonstrate how they will deliver on the plan. This is a policing centric document with acknowledgement that it will need to be broadened to focus on partnership approaches and the wider community in the coming years. At this point the clear crossover with the City of London Corporation (CoL) is objective 3- Creating Safer Spaces and this has been discussed with partners at CoL.
4. DCS Rebecca Riggs has been included throughout and participated in the planning stages of the development of the national strategic delivery plan to ensure a close understanding of the requirements and time frames.
5. As VAWG is not a specific crime type, but rather an issue that cuts across all strands of policing both internal and external, governance structures have been mapped and agreed to avoid duplication and maximise efficiency and effectiveness. (See attached Appendix A).

Regional

6. Arrangements have already taken place with the Metropolitan Police Service (MPS) and British Transport Police to ensure a consistency of approach across London. This will be supplemented by regular strategic meetings and updates to share good practice and mirror responses and activities.

Local

7. Assistant Commissioner (AC) Paul Betts has been appointed the Strategic lead for VAWG within the City of London Police and the response to VAWG has been recognised and prioritised within the currently new draft Policing Plan for 2022 – 2025.
8. A Strategic Delivery plan, in line with the national framework set by DCC Blyth, but also bespoke to specific requirements for the City of London Police, has been drafted and circulated internally for comment and amendment. The plan is designed to demonstrate the outcomes we seek to achieve and connect these, via a baseline action plan to the activities that are being prioritised now and those that will be developed and implemented in the medium and long term. It has already been arranged that, once the final version is agreed, it will be Peer reviewed by a Detective Chief Superintendent from Devon and Cornwall Police. There is a requirement that this plan is published by 31st March 2022.
9. A monthly 'Renewing, Rebuilding Confidence and Trust Strategic Steering group' has been formed and is chaired by AC Betts to provide direction, co-ordination and prioritisation. The Terms of Reference for the Group have been drawn up and agreed strategic leads across all areas of the City of London Police have been identified to deliver activities aligned to the delivery Plan.
10. An Action Plan/ baseline of activities has been drawn up and appropriate Senior Leadership Team (SLT) leads have been identified to both drive progress and be accountable for performance improvement. The baseline will be updated and scrutinised monthly by the Strategic Steering Group and a RAG assessment for each pillar, principle and associated activity assessed and assigned.
11. As Independent scrutiny is also required (by the National Strategic Delivery plan) the Force is exploring IASG representation at the group on a quarterly basis, and there will be further updates to the SPPC and PAB for Member oversight and scrutiny.
12. It is the Force's intention to make all governance documents relating to VAWG available for publication on the COLP external facing website to demonstrate transparency and promote accountability for every step.
13. An overarching VAWG threat assessment and problem profile has also been commissioned looking at the data from the last three years to provide

an intelligence led, evidenced based approach to inform current and future actions.

14. Additionally, whilst awaiting the delivery of the National performance framework from the NPCC lead, CoLP is identifying and baselining various data sets to ensure a quantifiable and qualitative evidence base to demonstrate the improvements made and value achieved.
15. In relation to the 3 National objectives some activity on each of these to date is described in Appendix B.

Conclusion

16. The CoLP continues to work in partnership with the City of London Corporation to enhance the City of London's response to VAWG. This report has highlighted some of the initiatives which have taken place to support this partnership and also our wider delivery of the NPCC VAWG strategy.

Appendice(s)

Appendix A- Current CoLP Governance Structure

Appendix B- Highlights of activity under the 3 NPCC National Objectives

Contacts:

Rebecca Riggs

Detective Chief Superintendent

Rebecca.riggs@cityoflondon.police.uk

Carly Humphreys

Chief Inspector

Carly.humphreys@cityoflondon.police.uk

Renewing and Building Trust and Confidence



Appendix A

Strategic Intent

We are committed and determined to uphold the highest standards of integrity and quality of service. We will bring about a demonstrable and sustained difference to policing attitudes and practice, through three overarching objectives.

AC Betts

Strategic Lead

DCS Riggs

Deputy
Supported by DCI Humphreys

Pursuit of Perpetrators

Crime & Prosecution
(DCS Paterson)

Safer Spaces

Public Confidence, Front
Line Policing and
Partnerships (Chief Supt
Heatley)

Improve Trust and Confidence

Leadership
(DCS Shaw & DCI MacLeod)

Complaints & Disclosure
(D/Supt Robinson)

HR & People
(Julia Perera)

Corporate Communications – Amanda Malyon

Quality Assurance - Chief Supt Atkins

This page is intentionally left blank

Appendix B- VAWG Update to February SPPC and PAB

Highlights of progress against NPCC objectives

NPCC Objective 1-Improve Trust and Confidence in Policing

The Force remains committed to upholding the highest professional and personal standards, this is achieved through the application of our Codes of Ethics and Standards of Professional Behaviour continuing to be a key priority in our strategy to improving trust and confidence, both internally and externally.

The City of London Police is actively leading on a number of initiatives to create a supportive and strong 'call it out' culture.

- This includes a focus on the importance of men being upstanders, not bystanders through our 'He for She' campaign, alongside the ongoing promotion of our safe processes for reporting inappropriate behaviours.
- A re-launch of the Code of Ethics and embedding this at all levels to assist in demonstrating to the workforce that the Force supports a culture that is inclusive, both for our staff and the public that we serve.
- Leadership programmes and new mandatory annual values, standards and ethics workshops will be part of this. These will emphasise the importance of staff being open and alert to, challenging inappropriate behaviour or actions that undermine the culture. Our leadership culture will continue to promote and encourage our staff to step forward and raise concerns through our well-publicised, internal and external reporting mechanisms.
- Recruiting the right people with the right skills plays a pivotal role in the growth of the organisation and further improving upon the culture. With an emphasis on improving diversity of the workforce within CoLP, outreach work has already begun in the City and surrounding London boroughs where there exists a more diverse demographic. This will involve both physical engagement and through social media.
- The Professional Standards Department (PSD), has completed a significant amount of work with the MPS to ensure that the internal historical case review of any sexual misconduct investigations, is consistent across London. This also includes a peer review of some cases to ensure absolute objectivity and the promulgation of shared learning and good practice. A full report of the findings will be completed by the end of January. This is being reported to your Professional Standards and Integrity Committee.
- In relation to our Vetting Department, CoLP has reviewed all of the points raised by the NPCC in their letter of requirements to forces and has addressed these as appropriate.
- The CoLP PSD has completed an internal review of the NPCC direction to Chair accelerated hearings wherever grounds are met, and make submissions to the

Chairs of independent panels, wherever appropriate, so that sanctions always meet the gravity of an offence. In addition, to seek judicial review when a decision has been made to retain someone in the service who we believe undermines our culture and trust in standards that the public expects of us. This review has concluded that the PSD already follows this guidance, and it is well embedded into its current practice.

NPCC Objective 2- Relentlessly Pursue Perpetrators

The CoLP is taking a whole system approach to targeting perpetrators, working across London with the relevant local authorities, healthcare, education and other law enforcement agencies. Nationally, there is a deeply felt, and long-standing concern from women, that the criminal justice system does not protect them when they are victims of violent or sexual crimes.

As an organisation the Force is working to improve the detection rates for key crimes including rape and serious sexual offences and working with the Crown Prosecution Service (CPS) to deliver the best criminal justice outcomes.

Currently, there is an absence of a consistent method for the police or the criminal justice system to identify how it is performing in relation to VAWG related crime. This does present challenges in reporting on outcome rates at a force or national level. The HMICFRS recognise that there is a need for a defined set of parameters that can be used consistently by all forces, this will establish whether improvements are being made, and which approaches taken are the most effective.

Highlights

- Vulnerability training is mandatory within the CoLP. The training underpins a trauma-aware approach at all levels to ensure that officers and staff tailor their responses and approaches accordingly to victims.
- Domestic Abuse processes are well established in the organisation, they include the introduction of a '20 Point Plan' and mandatory supervisor attendance at all DA incidents to enhance opportunities for evidence led prosecutions. This has been shared nationally as best practice.
- The Force is developing a process to proactively identify individuals using intelligence, who pose the highest risk of harm to women and girls. These perpetrators will be actively managed to prevent or reduce reoffending.
- There has been an upward national trend in the reporting of drink spiking offences, the CoLP has also experienced an increase with 52 reported incidents since April 2021. A trial has now been implemented across 30 licenced premises for each to have access to drink testing kits. This will enable customers who suspect that their drink has been spiked to have a staff member test their drink. This ability to provide an indicative result there and then, will greatly assist CoLP in identifying perpetrators through fast-time investigative enquires, thereby protecting potential victims.

NPCC Objective 3- Create Safer Spaces (*this section has been written in consultation with the City of London Corporation)

This is the objective within the NPCC Strategy where CoLP needs to work closely with partners in the City of London Corporation.

The Force and the City of London Corporation are working to create safer spaces, so that women and girls both are safe and feel safe, in line with the City of London Corporation Corporate plan.

In particular, by looking at individual factors which contribute to women and girls feeling unsafe, wherever they are. To create safer physical and online spaces, there is a need for greater comprehension regarding the data and evidence in relation to the challenges presented by VAWG.

- CoLP is working to build up detail around the current force intelligence picture, in addition to how this compares across the national landscape. Current data can provide areas of potential vulnerability through hot spots and will be enhanced by the intelligence profile being completed. The hot spot analysis has been completed over a 3 year period to identify where violent criminality tends to occur. In response, we have already targeted our activity at identified high-harm locations, including those associated with the night-time economy to make them feel safer to the public.
- For the Christmas Campaign , key days and times received an uplift of staff in order to provide a greater visible and pro-active policing presence in areas identified as potential hotspots. As part of this, funding from the Home Office enabled the provision of Night Safety Hubs¹ in collaboration with the Corporation and other partners. A review of this initiative revealed that although there was positive community feedback, uptake was low. There was some feedback from professionals that the location of the Hubs coupled with a reduced footfall due to Covid and impending restrictions at that time, may have impacted on this. Nevertheless, the learning from this initiative will be implemented into any future Safety Hub design process
- The City of London Corporation and CoLP have been awarded a £50,000 grant from the Home Office, this will be allocated to specific initiatives as follows:
 - £25,000 will fund the 'Good Night Out' campaign which will be promoted in March 2022. This awareness campaign will be largely delivered to the public in the City to challenge myths and misconceptions around sexual harassment.
 - £10,000 will fund a campaign to raise awareness of the 'Street Safe' app, encouraging people to report any areas they feel unsafe and reasons why they feel unsafe, for example poor street lighting. This will enable both the Police and City of London Corporation to address the issues raised.
 - £15,000 will fund Safer Sounds to deliver Welfare and Vulnerability Engagement training to 100 licensed venues across the City of London. This

¹ The Night Safety Hubs were staffed in partnership with the City of London Corporation, St John's Ambulance and Victim Support at St Botolph's Church, Bishopsgate. A Police Officer from Public Protection was also present to represent the City of London Police and provide specialist support to females who wished to report a concern.

will help to ensure they are able to prevent, respond and support vulnerable people, particularly women and girls. The training will also enable venues to promote and deliver the 'Ask for Angela' campaign previously reported on in the vulnerability deep dive to your previous Committee.

- CoLP has been working alongside Victim Support to deliver Safety in the City presentations to around 470 employees from businesses in the City. The sessions highlighted the City of London's response to VAWG, including information on how male employees can change their behaviour to help make women feel safer. The businesses provided positive feedback around the sessions and requested further sessions in 2022.

Agenda Item 9

Professional Standards and Integrity Report Feb 2022

Committee(s): Professional Standards and Integrity Committee	Dated: 18 February 2022
Subject: Action Fraud Statistics- Quarter 3- 1 st October 2021- 31 st December 2021	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 16-22	For Information
Report author: PC Ann Roberts, PSD Analyst	

Please refer to Glossary provided (Appendixes)

Executive Overview

This document contains the statistics prepared by the Professional Standards Directorate and Action Fraud for the third Quarter of 2021/22 (Oct to Dec).

Changes to the Police Misconduct Regulations	<p>This is the third quarter following a whole year of data where the new police misconduct regulations have been in full effect, where logged complaints include all dissatisfaction.</p> <p>This report has been drafted to reflect the new data and is in the same format as the main Professional Standards Directorate statistical reporting*. All comparisons to historic data are not relevant and are therefore not included.</p> <p>*Action Fraud data will be referred to in the overall figures to provide an overview of the Professional Standards Directorate workload, however the details have been removed and reported separately within this document.</p>
---	---

Professional Standards and Integrity Report Feb 2022

Action Fraud complaints	<p>Action Fraud – a National Service – continues to generate a greater volume of complaints than the City of London Police. This is a very small proportion against the volume of Action Fraud incident reports recorded.</p> <p>Complaint data has seen the number of complaint cases logged to a total of 84 in Q3. This is a decrease against the previous quarter (4%).</p> <p>The complaints are broken down as 4 logged under Schedule 3, and 80 not within Schedule 3.</p> <p>The volume of logged complaints is extremely low compared to the number of fraud reports to Action Fraud. Q3 2021/22 complaint figures represent 0.006% of all Action Fraud reports received by Action Fraud (AF) recorded 132,961 reports on the National Fraud Database consisting of 94,878 crime reports and 38,083 Information reports. YTD NFIB data where Action Fraud (AF) recorded 307,338 crime reports on the National Fraud Database and 122,376 Information reports. This totalled 429,714* (this may change once some reports are manually pushed through).</p>
Nature of Allegations	<p>Of the 89 allegations recorded during Q3 2021/22 the highest number was in the category of A1 – Police contact (35) followed by A2 – Decisions (28), followed by A4 – General level of Service (22). Reasons for complaint mostly relate to customer expectation of Action Fraud, with either the lack of contact or investigation cited.</p>
Finalised Allegations	<p>The total number of allegations finalised during Q3 is 84 compared to 81 in the previous quarter.</p> <p>Cases often contain more than one allegation; the number of cases finalised in Q3 is 91.</p>
IOPC Reports	<p>The IOPC has recently published the first annual complaint bulletin in the new format following the amendments to the Police Conduct Regulations. The IOPC has yet to published a Quarterly bulletin in the same format. The IOPC place a caveat to the City of London Police statistics to reflect the Action Fraud complaints as they are combined. A CoLP commentary sheet has been published on the IOPC website with an explanation regarding the combined statistics.</p>
Appeals	<p>None received.</p>
IOPC investigations	<p>There are currently no live IOPC investigations.</p>

Content

Part A – Complaint Cases and Allegations

Table 1 - Quarterly comparisons for Complaint Cases

Table 2 - Quarterly comparisons for Allegations

Table 3 – Quarterly comparisons for Allegations Finalised

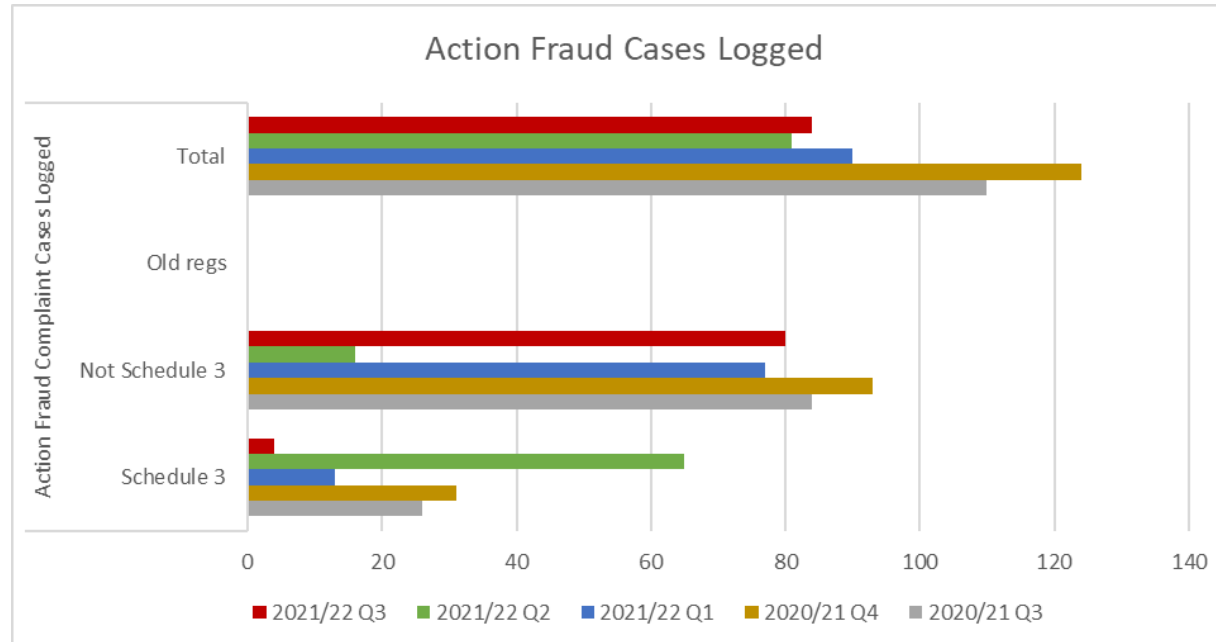
Part B - Appeals

Part C – IOPC

Part D – Learning

Part A – Complaints & Allegations

Table 1 - Quarterly Comparisons for Action Fraud Complaint Cases



- The number of Action Fraud complaints logged in Q3 2021/22 is 84 which is an increase of 3 from the previous quarter.
- 80 of these complaints fell outside of Schedule 3, 4 were within Schedule 3.
- This is a reverse from the previous quarter where more complaints fell inside of Schedule 3 (see graph).
- Recording standards require all customer dissatisfaction to be logged and the volume of reporting appears to have levelled since the initial increases following changes under the new Regulations.
- Additional information has been added to the AF website, which answers identified key complainants' frustrations. This informs potential complainants that the complaints process is not a mechanism to overturn the decision of NFIB, not to review and forward to a force for their consideration.
- In Q3 of the 2021/22 financial year Action Fraud (AF) recorded **132,961** reports on the National Fraud Database consisting of **94,878** crime reports and **38,083** Information reports.
- The complaint figures (total) represent 0.006% of the total number of Action Fraud reports recorded in Q3.

Themes of complaints received

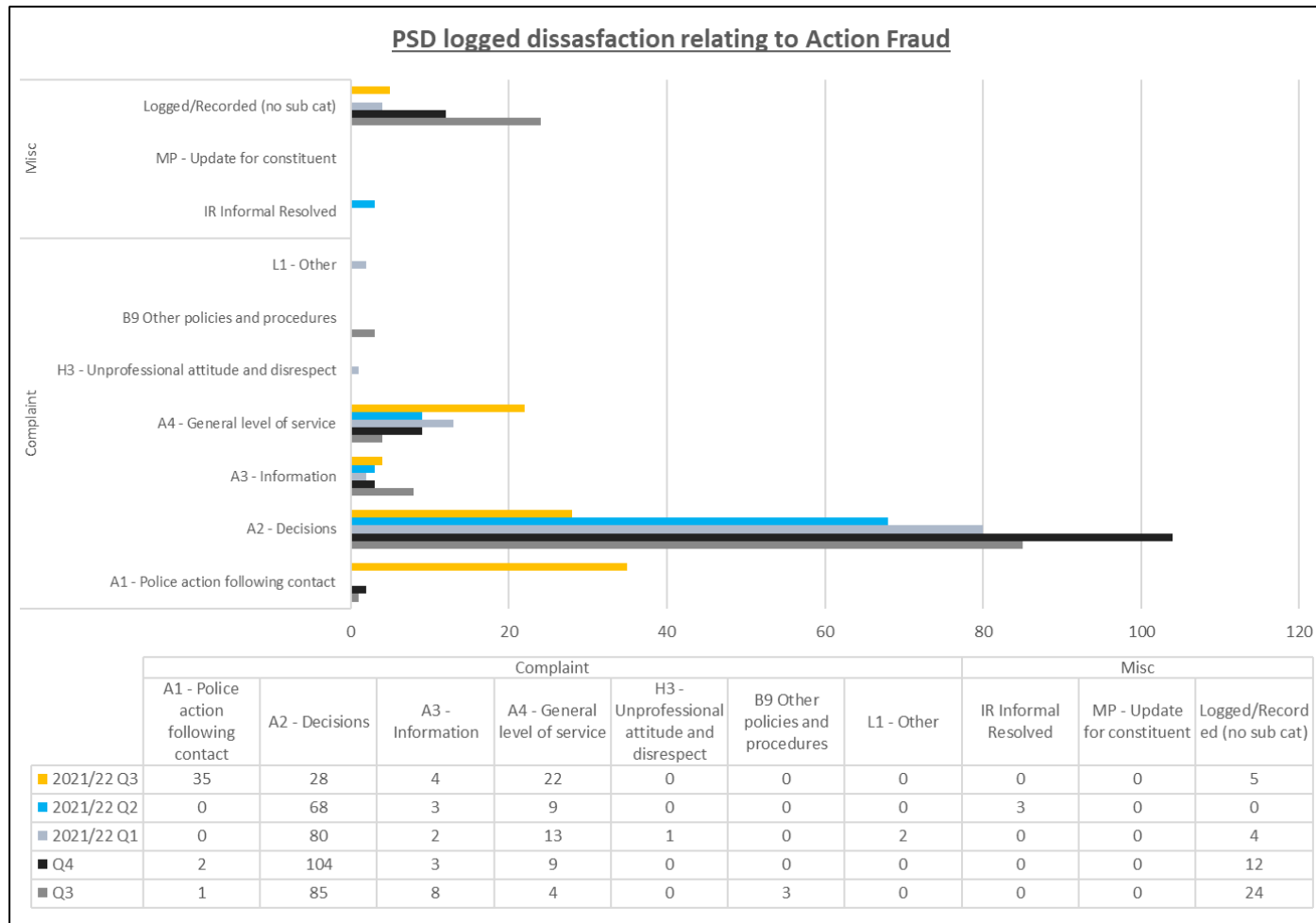
An analysis of complaints and dissatisfaction reports received over the previous 12 months, has been undertaken, detailed below. The highlighted ones are the most commonly received.

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

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

Professional Standards and Integrity Report Feb 2022

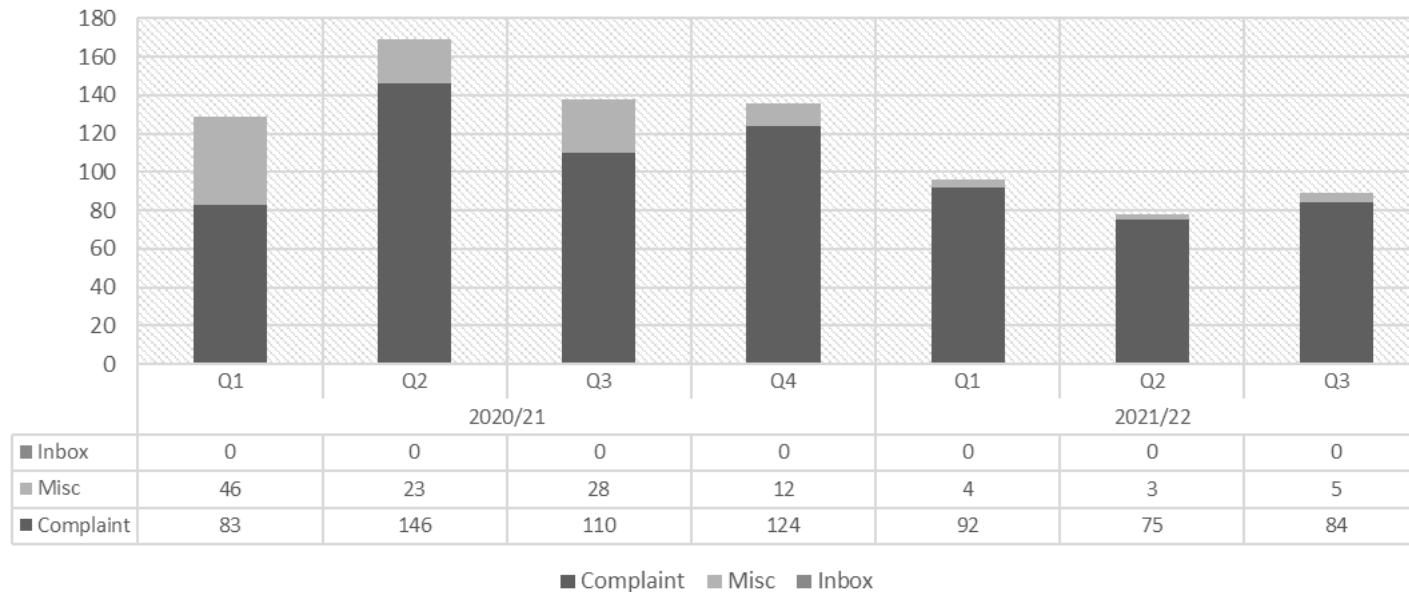
Table 2 - Quarterly Comparisons for Action Fraud Allegations



- Of the 89 allegations recorded during Q3 2021/22, Police Contact was the highest category with 35, followed by Decisions with 28 followed by General level of Service 22. The graph visualises the trend of Decisions over the yearly data being the highest category by far.
- Miscellaneous cases are being logged where Members of Parliament are making contact on behalf of constituents or if it is unclear if a complaint is being made. This number has dropped since letters explaining the AF system have been written to all Members of Parliament, and the changes to the recording standards in the regulations.
- The IOPC has recently published the yearly bulletin covering 2020/21. This includes AF data and is not separated out from CoLP complaint data. A commentary sheet has been included with this bulletin on the IOPC website to explain the data.
- Until the IOPC publishes the quarterly bulletins we do have any National data to make allegation type comparison with, or which allegation types will be the highest categories. It is unlikely that AF will be able to be compared against any other National data, being unique.

Professional Standards and Integrity Report Feb 2022

Action Fraud PSD Data



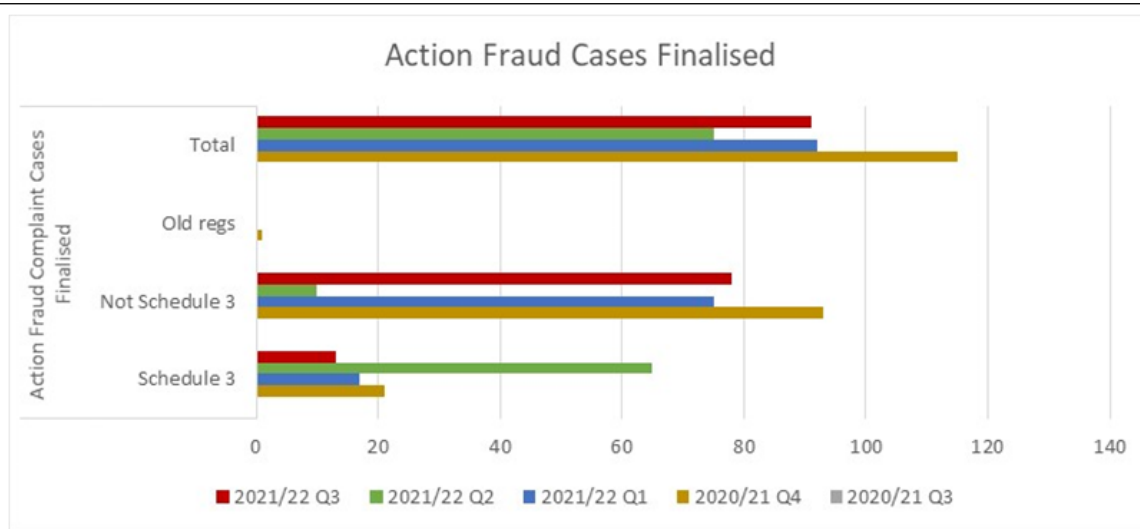
The vast majority of Action Fraud complaints cite a lack of response or investigation. Prior to changes to the Police Regulations these were usually resolved informally through service recovery by providing an update/explanation to the complainant and a swift resolution. (These were recorded as Miscellaneous). ALL expressions of dissatisfaction are now formally logged, therefore, as anticipated, there is an overall rise in complaint numbers (majority of which fall within the AF service). All forces are likely to see an increase in complaint numbers, which will be reflected in the IOPC bulletins when published. The City of London bulletin contains all data including AF data.

This increase in complaints doesn't appear to be reflected in the current data. The trend in AF complaints are decreasing. This could be the reflection of the positive changes to the AF website or the overall communication strategy surrounding the AF service.

Action Fraud call centres are working with CoLP to manage customer expectations. PSD is working with the NFIB to resolve simple dissatisfaction with early intervention especially around perceived lack of response. Action Fraud are recruiting staff to assist in raising the expectations of the service.

Professional Standards and Integrity Report Feb 2022

Table 3 – Finalised – Cases and Allegations – Q3



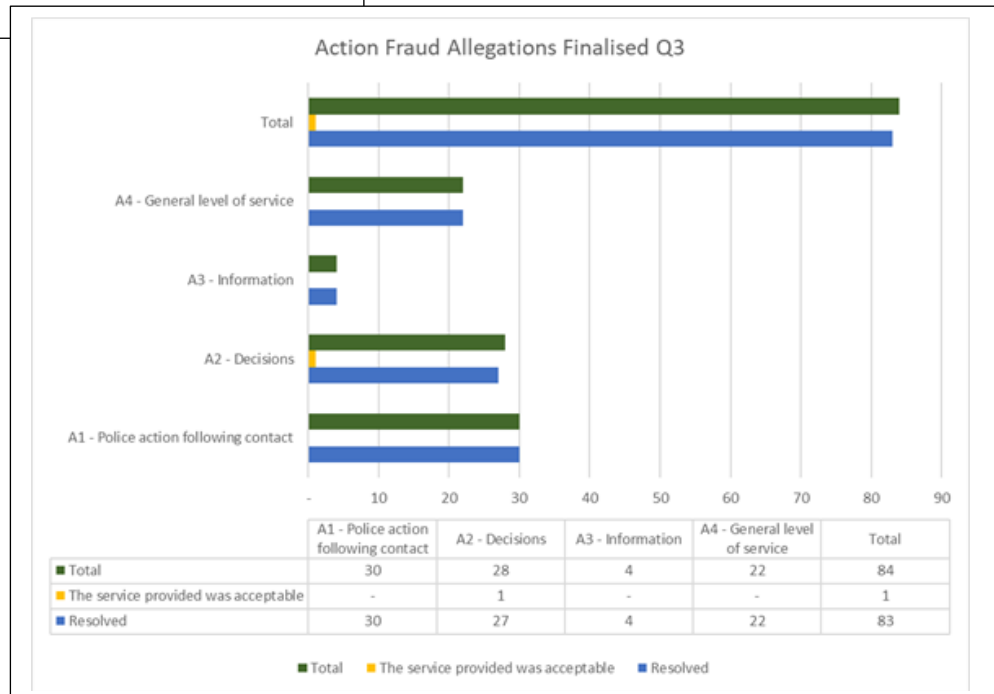
AF Finalised Cases: -

- 91 Action Fraud cases have been finalised during the Q3 2021/22.
- 78 fell outside of Schedule 3.
- 13 fell within Schedule 3.
- Q3 saw finalisations increase by 23% against the previous quarter.

**There were no finalisations recorded onto the Centurion database in Q3 2020/21 due to administration issues, therefore a large volume was recorded as Finalised during the previous Q4.*

AF Finalised Allegations: -

- 84 allegations have been finalised in Q3 2021/22.
- No outcomes were found that the Service provided was not acceptable.
- 83 (99%) allegations were Resolved.



Part B – Appeals

None

Part C - IOPC

No cases been brought to the attention of IOPC

Part D – Learning

Action Fraud Complaints

- Additional information has been added to the AF website, which answers identified key complainants' frustrations. This informs potential complainants that the complaints process is not a mechanism to overturn the decision of NFIB, not to review and forward to a force for their consideration.
- To increase service delivery/service recovery, more complainants are being telephoned to discuss their complaint. This is well received and often alleviates the need for written communication.
- Within conversations, and included in written communication, crime prevention advice is now provided with details of other agencies that maybe best placed to deal with their dissatisfaction. This has increased the number of complaints dealt with outside of schedule 3, therefore reducing demand and resource required.
- MP's and Home Office have been provided with Q&A's, that fully explain the role of AF and NFIB, and the remit of the complaints process. This has reduced the amount of MP letters being received as MP's and Home Office are able to engage with their constituents, without the need to forward their issues to PSD.
- 28 day update template letter from AF has been changed to better inform victims why their report is not referred for investigation. This is designed to overcome the problem with the current template saying that there are 'no viable lines of enquiry' when the victim feels there are, which has been generating complaints (even though this addressed in the FAQs on the AF website).

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

By virtue of paragraph(s) 1, 2, 3, 5, 6a, 6b, 7 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 7 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 7 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1, 2 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1, 2 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1, 2 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1, 2 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1, 2 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1, 2 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank