



## Professional Standards & Integrity (Police) Committee

**Date:** WEDNESDAY, 25 MAY 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) Deputy James Thomson  
Nicholas Bensted-Smith Michael Mitchell (External Member)  
Tijs Broeke Alice Ripley (External Member)

**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/LWZlCgOESZM>

A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

**John Barradell**  
Town Clerk and Chief Executive

# AGENDA

1. **APOLOGIES**

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

3. **MINUTES**

To agree the public minutes and summary of the meeting held on 18<sup>th</sup> February 2022.

**For Decision**  
(Pages 5 - 10)

4. **REFERENCES**

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

**For Information**  
(Pages 11 - 12)

5. **Q4 STOP AND SEARCH AND USE OF FORCE UPDATE - 2021-22**

Report of the Commissioner of the City of London Police.

**For Information**  
(Pages 13 - 24)

6. **ACTION FRAUD STATISTICS – QUARTER 4 – 1ST JANUARY 2022 – 31ST MARCH 2022**

Report of the Commissioner of the City of London Police.

**For Information**  
(Pages 25 - 34)

7. **CITY AND HACKNEY SAFEGUARDING CHILDREN PARTNERSHIP (CHSCP) CHILD Q PRACTICE REVIEW**

Joint Report of the Director of Community and Children's Services and the Commissioner of the City of London Police.

**For Information**  
(Pages 35 - 82)

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

Report of the Commissioner of the City of London Police.

**For Information**  
(Pages 83 - 110)

9. **QUARTERLY EQUALITY AND INCLUSION UPDATE**  
Report of the Commissioner of the City of London Police.
- For Information**  
(Pages 111 - 132)
10. **INTEGRITY AND CODE OF ETHICS UPDATE**  
Report of the Commissioner of the City of London Police.
- For Information**  
(Pages 133 - 144)
11. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
12. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
13. **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**
14. **NON-PUBLIC MINUTES**  
To agree the non-public minutes of the meeting held on 18<sup>th</sup> February 2022.
- For Decision**  
(Pages 145 - 146)
15. **NON-PUBLIC REFERENCES**  
Joint Report of the Town Clerk and the Commissioner of the City of London Police.
- For Information**  
(Pages 147 - 148)
16. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 4 - 1ST JAN 2022 – 31ST MARCH 2022**  
Report of the Commissioner of the City of London Police.
- For Information**  
(Pages 149 - 172)

17. **PCR CASE SUMMARY**

**For Information**  
(Pages 173 - 178)

- a) CM/05/21 (Pages 179 - 180)
- b) MI/384/21 (Pages 181 - 182)
- c) CO/47/21 (Pages 183 - 186)
- d) CO/142/21 (Pages 187 - 190)
- e) CO/273/21 (Pages 191 - 194)
- f) CO/279/21 (Pages 195 - 198)
- g) CO/284/21 (Pages 199 - 202)

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, 18 February 2022

Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Friday, 18 February 2022 at 2.00 pm

### Present

#### Members:

Deborah Oliver (Deputy Chairman)  
Helen Fentimen  
Deputy James Thomson

#### Officers:

Hayley Williams	- City of London Police
Rebecca Riggs	- City of London Police
Alix Newbold	- Director, Police Authority Board
Dermont Robinson	- City of London Police
Rebecca Riggs	- City of London Police
Ian Younger	- City of London Police
Jo Steed	- City of London Police
Rachael Waldron	- Town Clerk's Department
Polly Dunn	- Town Clerk's Department

#### 1. APOLOGIES

Apologies were received from Caroline Addy and Tijs Broeke. Mary Durcan and Michael Mitchell issued apologies but observed the meeting virtually.

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

There were no declarations.

#### 3. PUBLIC MINUTES

**RESOLVED**, that the public minutes and non-public summary of the meeting held on 5 November 2021 be approved as an accurate record.

#### 4. PUBLIC REFERENCES

Members received a report of the Town Clerk and Commissioner regarding the Committee's outstanding references.

It was hoped that the first draft of the attraction strategy would be brought through Committee in May.

**RESOLVED**, that the report be noted.

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

Members received a report of the Commissioner on the Stop and Search and Use of Force Data for Quarter 3.

Regarding the disproportionality index, it was less than the MPS but above the City of London Police two-year average which was concerning. There was a timing issue on the Home Office data extract and processing this in time for committee. This had been highlighted to Members previously.

Full information, including clarification on what 'use' of a baton includes, would be in the fuller Q3 report. On tasers, this had been drawn and aimed at people on 18 occasions. It was used on one occasion.

There would be more information in the next report on strip searches.

Officers were to confirm at the next meeting whether Emotionally and Mentally Disturbed (EMD) were those with confirmed mental health diagnosis.

A copy of the full report was to be shared with Members of the Committee if available ahead of the May meeting.

**RESOLVED**, that the report be noted.

## 6. **EQUALITY AND INCLUSION UPDATE**

Members received a report of the Commissioner regarding the Force's Equality and Inclusion update.

The KPIs were considered useful, particularly as so many of them were numeric, which made them easy to measure. Members were keen to know how these informed changes to practice. A dashboard was being completed for the new measures for 22-23 and would be available for the Q1 update in September..

Staff meetings would take place in the coming two weeks and findings would be fed back to the Commanders and Chief Officer Team.

The response to the IOPC's Operation Hotton report about behaviour of officers mainly at MPS Charing Cross police station included an increased resource in this area to bolster the Violence Against Women and Girls agenda. This was paired with the professionalism and trust stream of work. Huge learnings were being taken from schools and the voices of young people.

There was a discussion on a number of surveys and the need to draw on the work of the inclusive employer survey, with particular focus on BAME members of the Force and procedural justice on promotion and retention. There was wider work by the Force for a catch-all survey, to avoid survey-fatigue. It was hoped that even with a new system, results from previous years could still be used as baselines and mapped across, to ensure some continuity.

Members asked for an update in the next E&I report on the outcomes from the Police Federation Survey referenced by the Commissioner at the February PAB meeting.

**RESOLVED**, that the report be noted.

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

Members received a report of the Commissioner regarding the Integrity and Code of Ethics Update.

Following an investigation of the IOPC, 15 recommendations from the Op Hotton report were made for the MPS. Officers hoped to identify themes and risk, as it was naïve to think that there would not be read-across to COLP. Ultimately this would be brought altogether under the Equality, Diversity and Inclusion Action Plan.

The College of Policing was looking at cultural change across the Police Service, which would be considered in parallel to the IOPC recommendations.

It was thought that the integrity dashboard, currently attached as a non-public appendix, should be suitably redacted so it could be discussed in public session in future.

**RESOLVED**, that the report be noted.

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

Members received a report of the Commissioner regarding the Force's activity to address Violence Against Women and Girls.

At one of the Cluster Panels recently it was noted that there had been some experience of Officers using language that seemed to imply that rapes committed by a known person to the victim were somehow less serious than those committed by strangers. This was obviously not the case. It was a sensitive and delicate issue and it was recognised that members of staff were to refreshed in use of language in this area and would also be part of new recruit training. Standards were clear and anything beneath this is not tolerated.

Thought was being given as to how good news might be shared.

A culture of partnering with other forces had started and peer review in this area would take place.

Extra funding (locally, regionally and nationally) had been made available for safer spaces, which fed directly into the work on VAWG.

All forces were driving work to improve the service experienced by victims and were bringing in expert partners to assist with a delivery plan. There was a need to manage trauma whilst gaining and keeping the trust of victims.

A question was raised about minority ethnic groups and whether individuals from these groups (some of whom may not have English as a first language), could be provided with additional support in coming forward, given the extra challenges they faced in doing so. In short, the Commissioner agreed that there was more to be done on demographics to identify a problem profile and the support to be given.

It was suggested that a Banter Policy be considered along with the existing policy on Bullying, so that a framework might be implemented around which people could challenge behaviour.

**RESOLVED**, that the report be noted.

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

Members received a report of the Commissioner regarding the Action Fraud statistics for Quarter 3.

It was suggested that the written responses be improved so that they read less like a Police Report.

**RESOLVED**, that the report be noted.

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

There were no questions.

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

There was no other business.

12. **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.

13. **NON-PUBLIC MINUTES**

**RESOLVED**, that the non-public minutes of the meeting held on 5 November 2021, be approved as an accurate record.

14. **NON-PUBLIC REFERENCES**

Members received a report of the Town Clerk and Commissioner regarding the Committee's non-public outstanding references.

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

Members received a non-public appendix to item 7, the Integrity and Code of Ethics Update.

16. **PROFESSIONAL STANDARDS STATISTICS - QUARTER 3 - 1ST OCT 2021  
- 31ST DEC 2021**  
Members received a report of the Commissioner regarding the Professional Standards Statistics for Quarter 3.
17. **PCR CASE SUMMARY**  
Members received a report of the Commissioner regarding a series of PCR Case Summaries.
18. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF  
THE COMMITTEE**  
There were no questions.
19. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND  
WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST  
THE PUBLIC ARE EXCLUDED**  
There was no other business.

**The meeting ended at 3.57 pm**

-----

Chairman

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

This page is intentionally left blank

PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

**PUBLIC OUTSTANDING REFERENCES**

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	It is requested that this action be closed for PSIC on the basis that the Police Uplift Programme (PUP), recruitment and attraction is being scrutinised and monitored along with the Workforce Plan at the RREC.
1/2022/P	18 February 2022 Item 5 Q3 Stop and Search	Full information, including clarification on what ‘use’ of a baton includes, would be in the fuller Q3 report.	Commissioner	<b>Complete-</b> This is included in the Q4 update on the agenda.
2/2022/P	18 February 2022 Item 5 Q3 Stop and Search	There would be more information in the next report on strip searches	Commissioner	<b>Complete-</b> This is included in the Q4 update on the agenda.
3/2022/P	18 February 2022 Item 5 Q3 Stop and Search	Officers were to confirm at the next meeting whether Emotionally and Mentally Disturbed (EMD) were those with confirmed mental health diagnosis.	Commissioner	<b>Complete-</b> This is included in the Q4 update on the agenda.
4/2022/P	18 February 2022 Item 6- Equality and Inclusion Update	Members asked for an update in the next E&I report on the outcomes from the Police Federation Survey referenced by the Commissioner at the February PAB meeting	Commissioner	<b>Complete-</b> reference to this is included in the report on the agenda. A meeting

PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

				is to be held between the Chief Officer Team and Federation representatives to look at the Survey outcomes in more depth.
5/2022/P	18 February 2022 Item 6- Equality and Inclusion update	The response to the IOPC’s Operation Hotton report about behaviour of officers mainly at MPS Charing Cross police station included an increased resource in this area to bolster the Violence Against Women and Girls agenda. This is paired with the professionalism and trust stream of work. Update on CoLP governance and activity.	Commissioner	<b>Complete-</b> AC Betts is overseeing CoLP response to Op Hotton / IOPC report and recommendations. This will be developed through the CoLP Renewing and Rebuilding Trust & Confidence Board. which met on the 19/5/22  Actions are being collated and tracked for oversight at the Force Risk & Assurance / Audit Assurance Board, chaired by AC Betts

# Agenda Item 5

<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Dated:</b> 25 May 2022
<b>Subject:</b> Q4 Stop and Search and Use of Force update - 2021-22	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1- People are safe and feel safe
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N/A</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	<b>N/A</b>
<b>Report of:</b> Commissioner of Police Pol 31-22	<b>For Information</b>
<b>Report author:</b> Superintendent James Morgan, Head of City Police Task Force & Head of Contact	

## Summary

The number of Stop Searches conducted in Q4 has increased slightly (6%) compared to the last quarter, in contrast to the overall year on year decrease of 2% which is likely to be linked to the lingering effects of the pandemic. The positive outcome rate for the FY was 35%, remaining in the established trend (between 33% and 39%) and well above the national average (10-15%). For Q4 it was 34%. Disproportionality has increased slightly to 2.2 for black individuals and 1.3 for Asian individuals: above the rolling average for black individuals (2.0) but significantly below the wider London rate. We will conduct further analysis of this trend and provide further reporting to the committee's next meeting.

There were 8 Strip Searches over this quarter, all involving male adults aged 21-24; 38% where white males, a further 38% Asian males and the remaining 13% black males. Of these, 50% lead to a positive outcome.

In response to the Child Q report, the Force is conducting a review of all strip searches involving juveniles over the last 3 years. A summary of the data relating the FY 21/22 is included in this report (5 reports in total). The Force will provide a separate fuller detailed report to this Committee and the Police Authority Board setting out the outcome of the review in due course. There is however a joint report of the Director of Children's and Community Services, and the Commissioner on the agenda regarding the Child Q practice review.

The new dip sampling process for Stop Search reports introduced in pilot form in Q4 has achieved the target sampling rate (target 10-20%; actual rate for Q4, 13%); 20% of the records examined were considered best practise.

Use of Force continues to fluctuate extending the trend seen through Q2 and Q3. This requires further examination and will be addressed in future reports. Taser use (discharge) increased slightly this quarter, whilst handcuffing remains the most frequently used type of force. The gender, age and ethnic profile of those we use force against has remained largely consistent with Q3.

## **Recommendation**

Members are asked to note the report

## **Main Report**

### **Background**

1. Members will recall that due to the timing of the quarterly submission for the Home Office annual data return clashing with the committee cycle there is insufficient analytical capacity to produce the full Stop Search and Use of Force reports in time for this Committee. These will be available to Members once published on the Force website, and summary reports are attached to this paper. If the full reports identify any significant variations from established trends, these will be addressed in our subsequent reports to this Committee.

### **Current Position – Stop Search**

2. Over the last quarter the total number of stop/searches has increased by 6% compared to the previous quarter: this most probably reflects the increased footfall in the City in general. However, a year-on-year comparison shows a slight overall decrease of 2%, reflecting the ongoing impact of the pandemic during the start of the year. The positive outcome rate has decreased slightly to 34% compared to Q3: over the financial year as a whole the rate was 35%, also a slight decrease on FY 20/21 (37%). Both the quarterly and annual variations are in line with the established trend, the rate normally fluctuating between 32% and 39%, compared to a national average of between 10 and 15%.
3. Over this quarter there has been a drift in the peak time for stop/searches from Wednesday afternoon (which was the historic, established trend) to the early hours of Saturday mornings. There has been a corresponding increase on Fridays and Saturdays as well. This reflects the growth of the leisure and night-time economies, and the corresponding policing focus to counter associated crime types.
4. Disproportionality increased slightly this quarter, after having reduced in Q3 following the spike reported in Q2. For black individuals it increased from 2.1 to 2.2, and for Asian individuals from 1.1 to 1.3. This is above the rolling average for black individuals for the last year (2.0) but below the average for Asian individuals (1.5). More work is required to understand this trend, which has emerged since the end of the pandemic. We will conduct a detailed review and report the findings in our next quarterly report.
5. Stop/searches involved 37 under 18s this quarter (6% of the total), the majority of these searches relating to going equipped or offensive weapons. None of these searches resulted in a strip search. This is in line with the trend for juveniles subject to stop/search in the City and is in contrast to the overall trend which sees the majority of persons stopped for drug-related matters.

## **Strip Searches**

6. At your last meeting members asked for more information regarding Strip Searches conducted under Stop/Search powers. Strip Searches conducted under Stop/Search powers fall into two categories. A 'More Thorough Search' in which intimate parts are not exposed; and an 'Intimate Parts Exposed' search. A More Thorough Search maybe conducted away from the Police station but must be conducted out of public view and involves the removal of anything other than 'JOG' items of clothing (jacket, outer-garment, gloves). An Intimate Parts Exposed search involves the exposure of the subject's intimate body parts. An Intimate Parts Exposed search must be conducted in a police station, and for juveniles an Appropriate Adult must be present, and a supervising officer must be consulted prior to the search. The conduct of strip searches under these powers is directed by the statutory guidance given in Code of Practise 'A' issued under the Police and Criminal Evidence Act 1984 ('PACE Code A'). These powers are different from those which govern the conduct of strip searches of detainees in custody: those are governed by Code C of PACE and not covered in this report
7. In future, we will provide specific reporting each quarter on Strip Searches.
8. In Q4, 8 or 9 individuals were subject to strip search under 'Code A' powers: At the time this report was required to be submitted, the data was being verified by the Performance Information Unit and the *exact* number will be confirmed at the meeting.
9. The following data relates to the 8 records which have been reviewed in detail by the Force Stop/Search lead. 7 consisted for a full (intimate parts exposed) search and 1 a 'more thorough search' (in which intimate parts where not exposed). All were male, aged 21-24. Of this group, 38% were from a white background, a further 38% from an Asian background and 13% from a black background. The sample size is too small to base a disproportionality index calculation on. However, for white and black subjects these percentages approximately mirror the breakdown of the Force's custody population, but not for Asian subjects (FY20/21, 43% white; 14% black; 12% Asian). All of these searches were conducted under the powers from s.23 Misuse of Drugs Act 1971. In 50% of the cases there was a positive outcome (3 arrests, 1 drugs warning).
10. In all bar one record the grounds for the stop/search are clearly and comprehensively set out in the written record. Where smell of cannabis has been a factor it has not been the sole factor which led to the stop, and the other information and intelligence available to the officers is clearly set out. The record for the final instance of stop/search is less clear, with a lack of clarity leading to ambiguity. The officer's accompanying arrest statement sets out the grounds more clearly, but this learning will be fed back to the officer.

## **Quarterly Thematic Review – Juvenile Strip Search**

10. Following the release of the report into the incident involving Child Q, the quarterly thematic review for this quarter has focused on juvenile strip searches. This has been conducted as part of a wider programme of work the Force has initiated to implement the recommendations of that report and a more detailed report on that review will follow. In the last FY there were 5 records relating to *juvenile* stop

searches. Learning has been identified and action has already been taken to implement this. There is a joint report by the Director of Children and Community Services and the City of London Police regarding Child Q on this agenda.

### **Dip Sampling**

11. As previously reported to the Committee, the Force introduced a new process for dip sampling Stop/Search records during Q4 on a pilot basis. The aim of this process is to achieve a 10-20% dip sampling rate of written records and Body Worn Video recordings by supervisors (Sergeant to Chief Superintendent) across Local Policing (with wider role out to the whole Force to follow). Initial role out was confined to Local Policing to test and validate the process as Local Policing accounts for c92% of all stop search activity in Force.
12. Over Q4 a dip sampling rate of 13% was achieved. Body Worn Video was available for review in 68% of the records examined. Body Worn Video may not be available if the officer forgets to turn it on, or after the incident fails to save it and the dip sampling takes place more than 30 days after the incident (to comply with data protection legislation unless there is a policing purpose for longer retention BWV recordings are automatically deleted after 30 days).
13. Learning was identified in 17% of the BWV recordings reviewed. This falls into two broad categories: officer safety considerations (position of the officer in relation to the subject of the search) and the need to give 'GOWISELY'<sup>1</sup> both clearly and comprehensively before the search begins.
14. In all but 4 instances the written record was also reviewed as part of the dip sampling process. Learning was only identified in relation to 3 of the records examined, all relating to how comprehensive the officer's written record of their grounds was.
15. Of the records reviews, 17 (20%) were considered to be best practise, with feedback being provided to officers with identified learning or whose work has been identified as best practise. In two cases this was done in writing, with the remainder consisting of a face to face debrief/feedback session.
16. The key lessons identified during this quarter relate (in order) to the need for officers to activate Body Worn Video (BWV) as early as possible during encounters; to categorise BWV recordings appropriately to ensure their retention when officers have indicated that the recording has been retained; officer safety considerations when conducting searches; and the need for 'GOWISELY' to be clearly and comprehensively explained, backed by equally comprehensive notes.
17. Following the pilot, from Q2 FY 22/23 onwards we will be extending the dip sampling process force wide and including Use of Force. Changes will be made to the forms used to collate supervisor feedback to allow key themes/trends to be more easily quantified to enable easier reporting and feedback to the Force as a whole.

---

<sup>1</sup> GOWISELY is an acronym used by officers as an 'aide memoire' for the information they are supposed to give to a stop/search subject, prior to commencing the search, to ensure compliance with Code A of PACE

## Current Position – Use of Force

18. Use of Force reduced between Q3 and Q4 from 741 to 639 incidents, a 13% reduction. This continues the trend of notable fluctuations quarter-on-quarter we have seen since the end of lockdown 3 and it remains unclear what is driving these variations over the year. In relation to the shift from Q3 to Q4 it is possible that the impact of policing the Christmas period in Q3 is influencing the figures compared to Q4. We will conduct additional reviews of the data and report further in our subsequent reports.
19. Handcuffing remains the predominant type of force used. Taser use has seen a slight variation compared to Q3, with 4 discharges and 20 other uses (compared to 1 discharge and 21 other uses in the Q3). Other uses of force with significant medical impact factors also saw fluctuations this quarter: Batons were not used at all (compared to 3 in Q3), whereas police dogs were deployed twice (compared to none in Q3).
20. Injuries linked to or resulting from Use of Force also fluctuated with officer injuries reducing from 10 (Q3) to 3 (Q4), and subject injuries increasing by 1, from 13 (Q3) to 14 (Q4).
21. Subjects of force remain overwhelmingly male (82% in Q4; 74% in Q3) with the percentage of females subject to force remaining largely static (8% in Q4; 9% in Q3). This largely tracks the Force's custody population (FY21/22) which was 86% male and 12% female (and 2% not recorded).
22. The ethnic breakdown of those subject to force also remains relatively consistent (based on officer-defined ethnicity). In Q4 49% of subjects were recorded as white (53% in Q3), 14% Asian (12% in Q3) and 28% black (23% in Q3). Without the full analytical report, it is not possible to say if this will cause the disproportionality indexes to move from Q3 (1.98 for black individuals; 0.72 for Asian: the rolling average being 2.2 and 0.89 respectively).
23. Reported use of force involving juveniles represented 4% of the total for this quarter, down from 5% in Q3. This is in line with the force's custody population in FY 21/22 where 4% of detainees were juveniles.

## Matters arising from previous PSIC Meeting

24. **'Use' of Batons.** At the Committee's last meeting Members enquired about the definition of 'use' in relation to police Baton's. The question was asked in the context of the sub-divisions of the term 'use' for Taser (draw, aimed, red-dotted, discharged). The use of batons by officers is recorded in a similar manner. Officers are required to report when they draw their baton, and when they use it. In this context, 'drawn' refers to removing it from the holster.
25. This can be either a 'discrete' draw where the baton is not extended, or an 'overt' draw here the baton is withdrawn and extended at the same time. For the report of Use of Force when an officer records that their baton has been 'used' this refers

to having used the baton in any other way than removing it from the holster: this includes striking the subject or using the baton defensively to maintain a stand-off distance between the subject and the officer, although in practise it will almost always refer to a strike being delivered with the Baton. If an officer draws their baton and immediately uses it that would only be recorded as a 'Use' rather than a 'Draw' and 'Use': where 'Draw' is recorded first this indicates the officer used the drawn baton as a tactic in itself and the situation has deteriorated to the point where they have been required to 'Use' the baton (i.e., strike the subject).

26. Baton Use has one of the highest medical impact factors of tactics available to officers, more so than the deployment of Taser. We would therefore expect to see Batons be used less frequently than other tactics, including unarmed defensive skills, PAVA incapacitant spray, handcuffing and Taser. This is reflected in the established Use of Force trends across the Force, with Batons being only rarely used.
27. Batons may also be used in public order operations where the context is slightly different. First, commanders may *order* officers to draw their batons as a collective show of strength in a public order situation. This would be recorded as a 'Use' by all the officers involved, but officer giving the order would be required to justify the use (whereas in normal circumstances the individual officer must justify the force they use). Also in public order situations, the medical impact factors associated with baton strikes are not as significant as a different baton, made of plastic, is currently used in public order operations.
28. Over the last two years we have recorded Batons being *drawn* on 82 occasions. This equates to an average of 3.5 per month but the distribution is not even. The bulk of these records (44n<sup>2</sup> or 54%) relate to a single day in June 2020 which involved a significant public order operation in central London linked to protest/counter-protest relating to the Black Lives Matter movement. When those records are removed, the average run rate equates to 1.6 records per month. 71% (58n) of records relate to Use of Force during Public Order operations, and 76% (62n) occurred in the Metropolitan Police Area.
29. Over the same period, we recorded 31 *uses* of batons. In 12 of these instances, the baton was used directly; in the remaining 19 a corresponding 'Baton Drawn' record exists. Of the records of Batons being used, 20 relate to Public Order incidents (65%), and the majority (24n or 77%) occurred in the Metropolitan Police Area which largely mirrors the records of Batons being drawn. As with Batons being drawn, a significant percentage (11n or 35%) relate to the same large public order operation on one day in June 2020.
30. **Emotionally and Mentally Disturbed (EMD).** Members asked for more information regarding this term. This term does not refer to subjects who have a specific diagnosis, but rather is a planning consideration for officers to be aware that subjects of force may not react rationally or in a predictable manner based on either internal factors (such as mental illness) or external factors (stress created by the situation). The term, however, does encompass subjects suffering from

---

<sup>2</sup> n= number

Acute Behavioural Disturbance and Excited Delirium which are medically recognised terms.

31. Specific guidance is given to officers during training on how to recognise the potential indicators that an individual may be subject to Emotional and Mental Disturbance, and tactical considerations for dealing with such individuals. This may include backing off, containing (rather than restraining) and giving them time and space. However, it is important to note that even with a subject who officers believe is suffering from Emotional and Mental Disturbance, it may be necessary for officers to move forward and use force (restraints etc) depending on the circumstances, for example an immediate threat to others, members of the public or the subject themselves.

## **Conclusion**

32. The established trends in both Stop/Search and Use of Force continue, although we are beginning to see a shift (in particular relating to Stop/Search) in the time searches occur. This is most likely in response to the change in the leisure and night-time economy.

## **Appendices**

1. Stop/Search Q4 FY21/22 summary report
2. Use of Force Q4 FY21/22 summary report

**James Morgan**

**Superintendent**

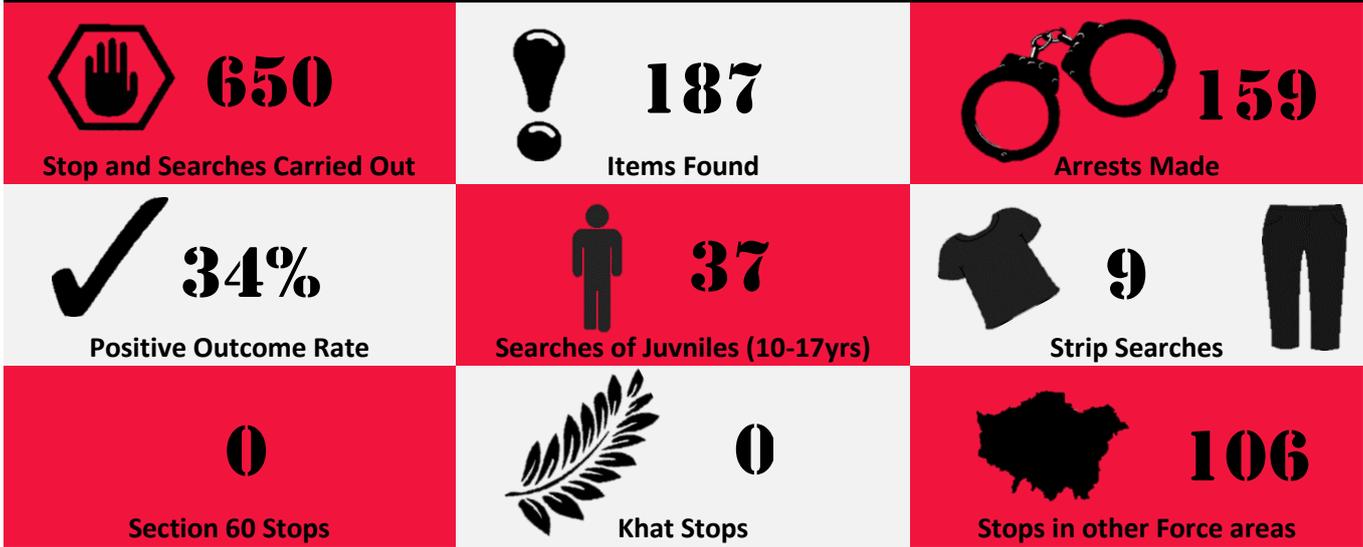
**Head of City Police Task Force & Head of Contact**

T: 020 7601 2102

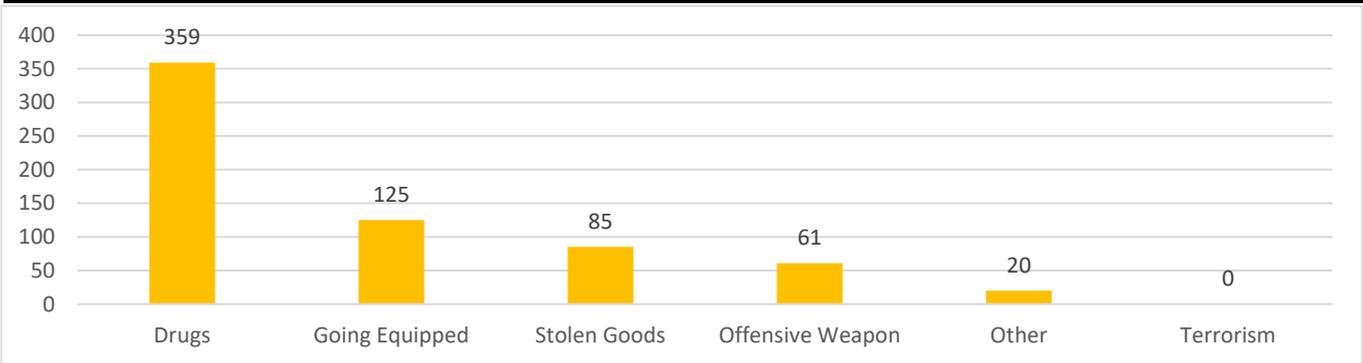
E: [james.morgan@cityoflondon.police.uk](mailto:james.morgan@cityoflondon.police.uk)

This page is intentionally left blank

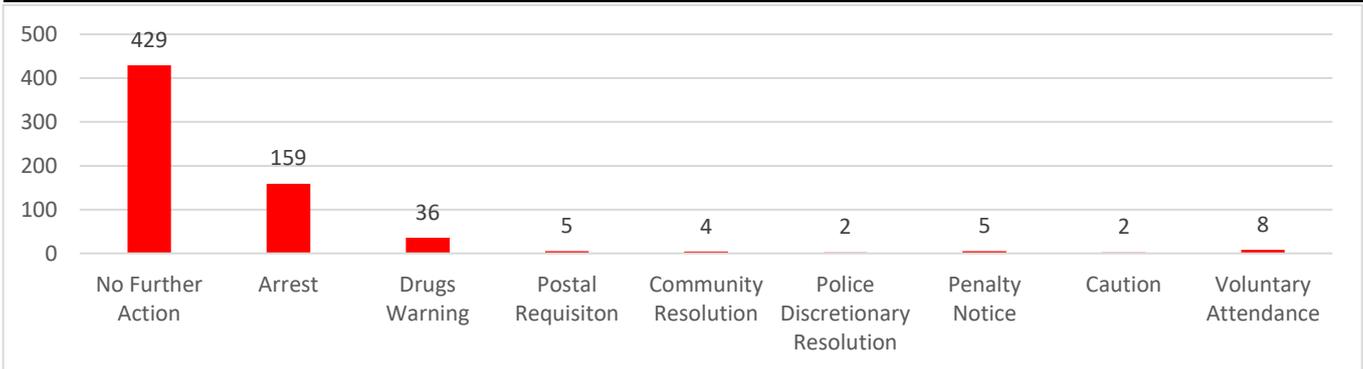
## Stop and Search Summary Q4 2021/22 (1st January - 31st March 2022)



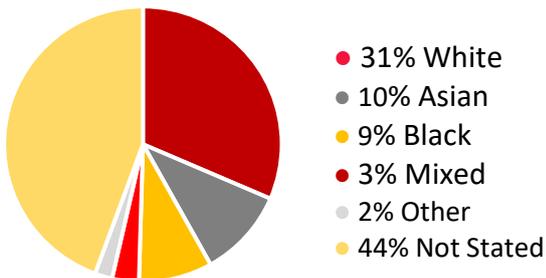
### Reason for Stop



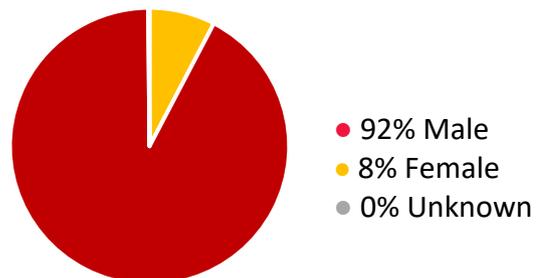
### Outcome of Stop



### Subject Self Defined Ethnicity



### Subject Gender



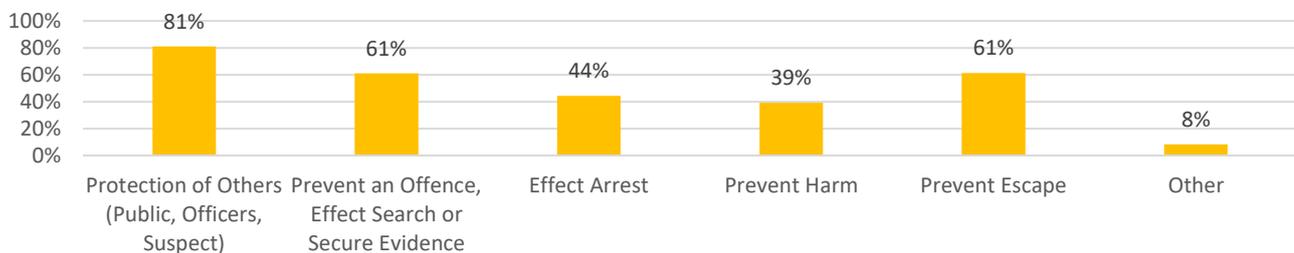
This page is intentionally left blank

## Use of Force Summary Q4 2021/22 (1st January - 31st March 2022)

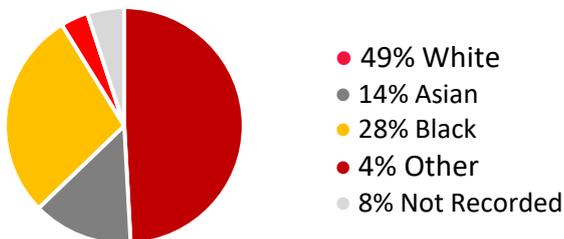
This summary provides an insight into the number of submitted use of force forms. More than one form can be submitted for an incident if multiple officers are involved. Each form can also include multiple reasons for the use of force and/or multiple tactics. Details of the subject on the forms submitted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



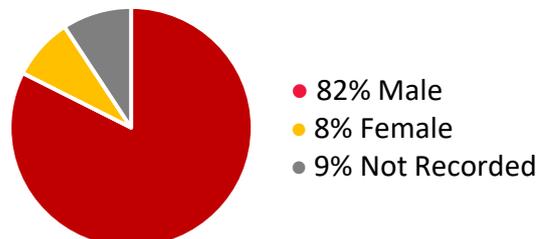
### Reason for Use of Force (% of all forms)



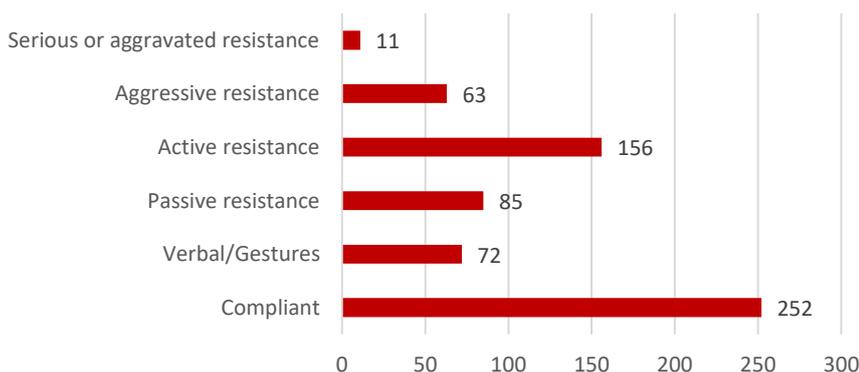
### Subject Ethnicity



### Subject Gender



### Conduct of Subject



**18%**

of forms involved subjects believed to have mental health issues

**4%**

of forms involved juveniles

This page is intentionally left blank

## Professional Standards and Integrity Report May 2022

<b>Committee(s):</b> Professional Standards and Integrity	<b>Dated:</b> 25052022
<b>Subject:</b> Action Fraud Statistics – Quarter 4 – 1 <sup>st</sup> January 2022 – 31 <sup>st</sup> March 2022	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	1- People are safe and feel safe
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N/A</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>N/A</b>
<b>Report of:</b> Commissioner of Police	<b>For Information</b>
<b>Report author:</b> Det Supt Dermont Robinson / PC Ann Roberts Analyst - Professional Standards Department	

**Please refer to Glossary provided (Appendixes)**

### **Executive Overview**

This document contains the statistics prepared by the Professional Standards Directorate and Action Fraud for the fourth Quarter of 2021/22 (Jan to March).

<b>Changes to the Police Misconduct Regulations</b>	<p>This is the fourth quarter and completes a second year of data sets following the introduction of new police misconduct regulation, and 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>
<b>Action Fraud complaints</b>	<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 194 in Q4. This is an increase against the previous quarter (131%). This increase reflects a change in logging of complaints.</p>

## Professional Standards and Integrity Report May 2022

	<p>The complaints are broken down as 34 logged under Schedule 3, and 160 not within Schedule 3.</p> <p>Changes to the Police Complaint &amp; Conduct regulations in 2020 placed a greater emphasis on handling complaints in a <i>reasonable and proportionate</i> way and in a more customer focused manner.</p> <p>Reports of dissatisfaction are logged and assessed in line with Schedule 3 of the Police Reform Act 2002 and IOPC Statutory Guidance 2020 and this assessment can result in one of a number of outcomes;</p> <ul style="list-style-type: none"> <li>• <b>Non-Schedule 3 or early service recovery.</b> PSD will make early contact with the complainant to understand their concerns and their dissatisfaction and, where the nature of their dissatisfaction allows, will try to resolve it to their satisfaction. This avoids a more lengthy process of investigation and can provide a complainant with an early resolution, explanation or other satisfactory outcome. If at the end of this process, it cannot be resolved it may be dealt with as a formal complaint within Schedule 3.</li> <li>• <b>Schedule 3 Recorded</b> – IOPC Statutory Guidance stipulates where complaints must be recorded and those that must be investigated; these include the more serious matters. Complaints which do not require an investigation will be handled in a <i>reasonable and proportionate</i> manner to try to achieve an earlier resolution to the complainant's satisfaction, while others will be investigated formally. At the end of this process if the complainant remains dissatisfied with the outcome of the complaint they have a right of review by either the Local Policing Body or the IOPC, depending on the seriousness of the allegation.</li> <li>• <b>Referral to Independent Office for Police Conduct</b> – some complaints may be referred to the IOPC and they may decide to independently investigate or oversee a police investigation. The IOPC also monitor our complaints system.</li> </ul> <p>The volume of logged complaints is extremely low compared to the number of fraud reports to Action Fraud. In <b>Q4</b> of the 2021/22 financial year Action Fraud (AF) recorded <b>132,654</b> reports on the National Fraud Database consisting of <b>92,357</b> crime reports and <b>40,297</b> Information reports.</p>
<p><b>Nature of Allegations</b></p>	<p>Of the 197 allegations recorded during Q4 2021/22 the highest number was in the category of A2 – Decisions (101), followed by A1 – Police contact (66) followed by A4 – General level of Service (17).</p>

## Professional Standards and Integrity Report May 2022

	Reasons for complaint mostly relate to customer expectation of Action Fraud, with either the lack of contact or investigation cited.
<b>Finalised Allegations</b>	The total number of allegations finalised during Q4 is 178 compared to 84 in the previous quarter. Cases often contain more than one allegation; the number of cases finalised in Q4 is 155.
<b>IOPC Reports</b>	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 publish 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.
<b>Appeals</b>	None received.
<b>IOPC investigations</b>	There are currently no live IOPC investigations.

Professional Standards and Integrity Report May 2022

**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**

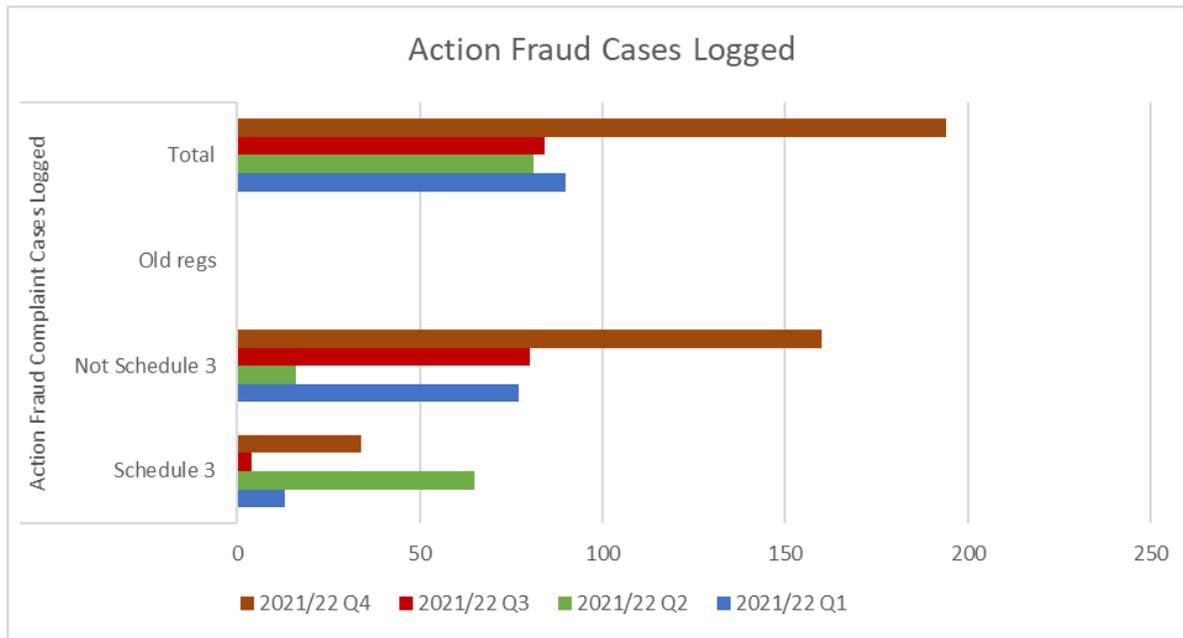
**Part C – IOPC**

**Part D – Learning**

Professional Standards and Integrity Report May 2022

**Part A – Complaints & Allegations**

Table 1 - Quarterly Comparisons for Action Fraud Complaint Cases



Page 29

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 top 3, most commonly received.

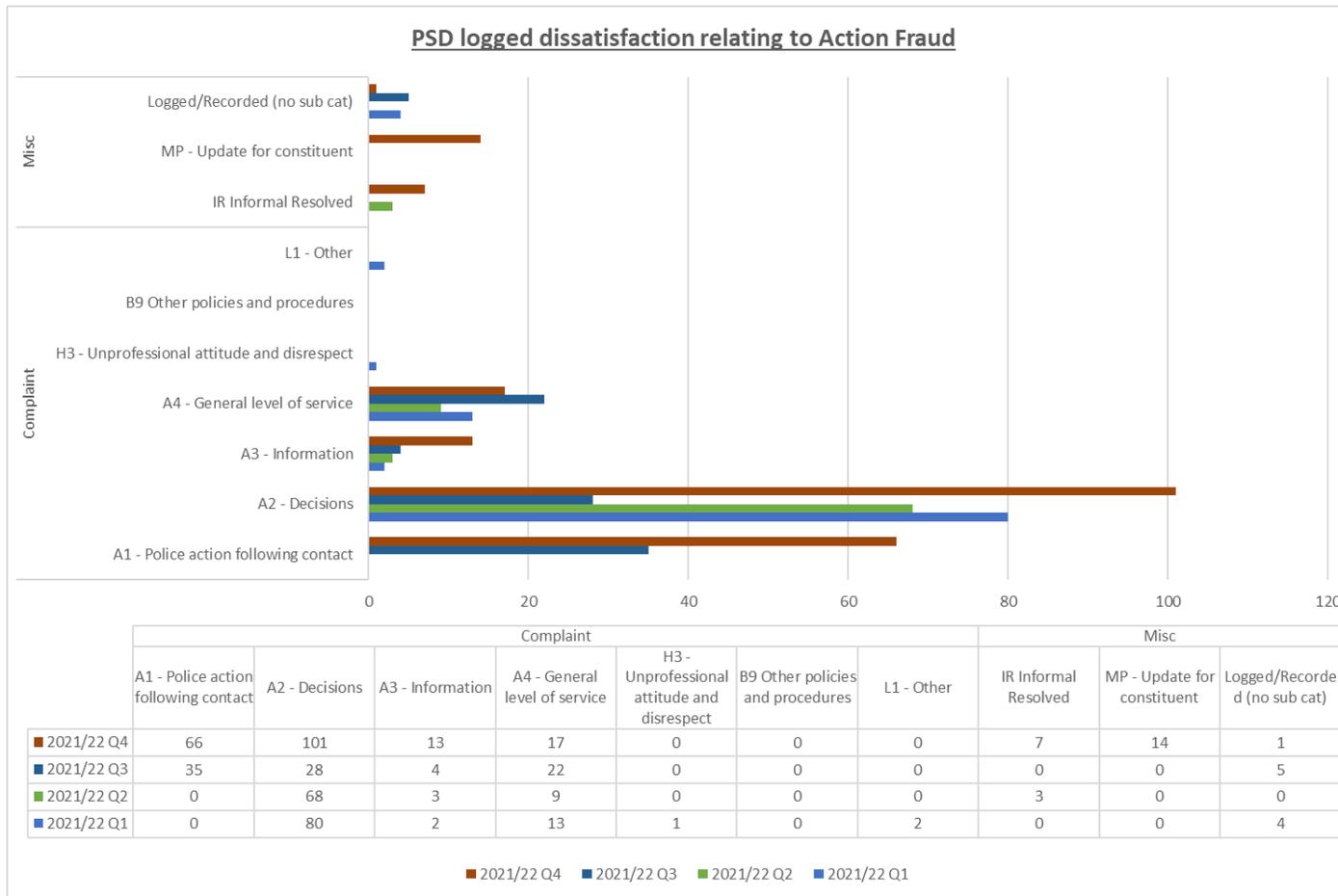
- **AF has not investigated a report made**
- **NFIB has not investigated a report made**
- **Complainant advised that there are no viable lines of enquiry to investigate their report, when viable lines of enquiries have been provided**
- No update was provided, following report made to AF
- Report disseminated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

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

- The number of Action Fraud complaints logged in Q4 2021/22 is 194 which is an increase of 110 from the previous quarter.
- 160 of these complaints fell outside of Schedule 3, 34 were within Schedule 3.
- The previous quarter was an anomaly where more complaints fell inside of Schedule 3, this quarter has reverted to the trend (see graph).
- Recording standards require all customer dissatisfaction to be logged and the volume of reporting. At the beginning of 2022 (Q4) a decision was taken to record all Action Fraud complaints received by PSD and those received directly by the Action Fraud team. This is to ensure an accurate record is kept of the demand being dealt with and also enables relevant cases to be escalated to be dealt with under Schedule 3 timely.
- 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 **Q4** of the 2021/22 financial year Action Fraud (AF) recorded **132,654** reports on the National Fraud Database consisting of **92,357** crime reports and **40,297** Information reports.

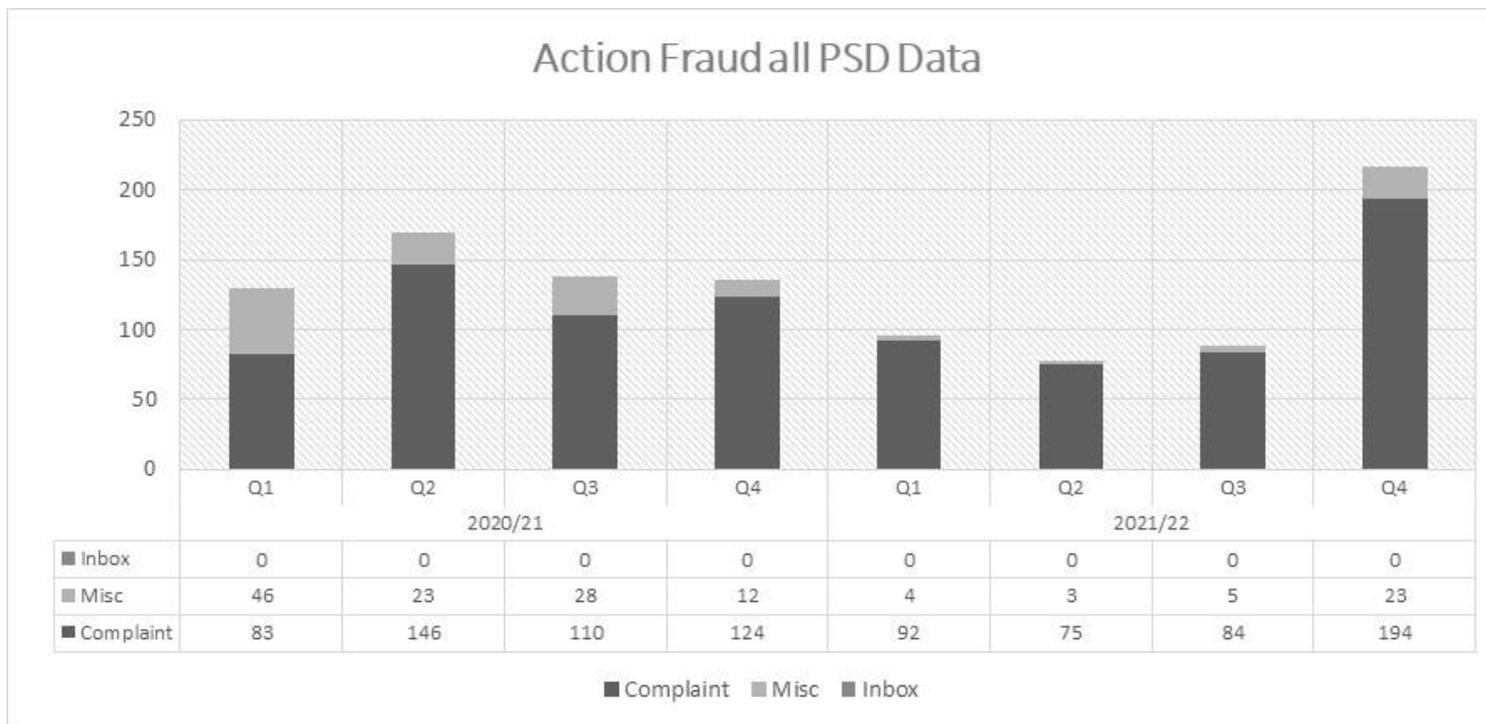
Professional Standards and Integrity Report May 2022

Table 2 - Quarterly Comparisons for Action Fraud Allegations



- Of the 197 allegations recorded during Q4 2021/22, Decisions was the highest category with 101, followed by Police Contact with 66 followed by General level of Service 17. 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 not clear if a complaint is being made. This number had 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. However the increase this quarter in MP enquiries appears to be no more than more people have sought assistance from their MP's about the outcome of their Action Fraud report assessments.
- The IOPC 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 publish 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 May 2022



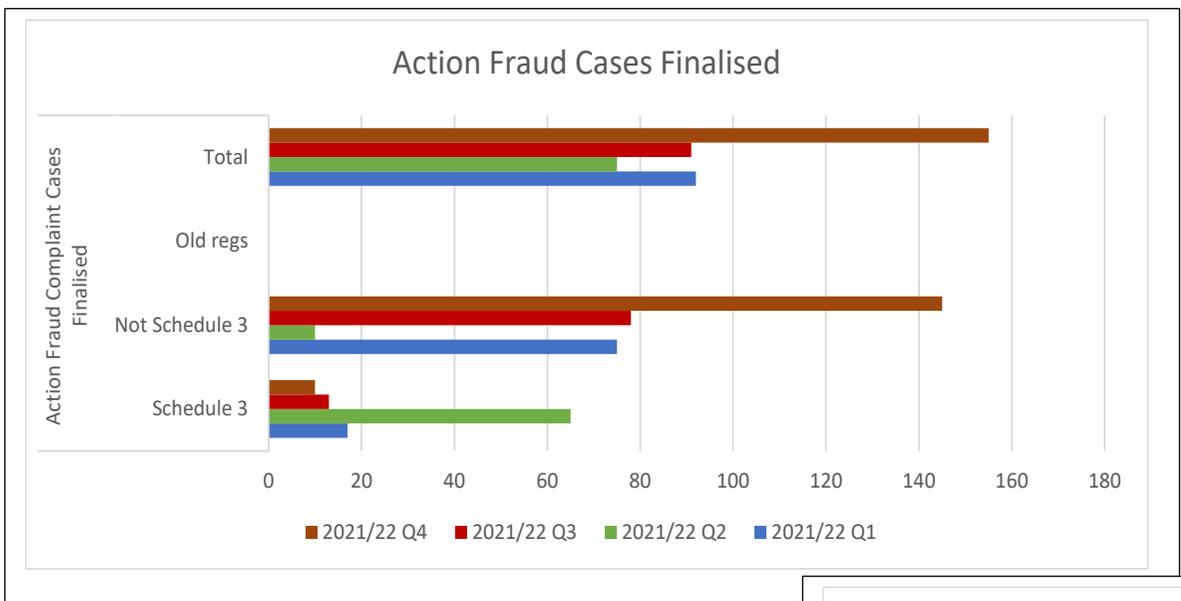
The vast majority of Action Fraud complaints cite a lack of response or investigation. Prior to changes to the Police Regulations these were usually resolved informally through service recovery by providing an update/explanation to the complainant and a swift resolution. ALL expressions of dissatisfaction 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.

Due to these changes to recording standards, at the beginning of 2022 (Q4) a decision was taken to record all Action Fraud complaints received by both PSD and those received directly by the Action Fraud team. This is to ensure an accurate record is kept of the demand being dealt with and also enables relevant cases to be escalated to be dealt with under Schedule 3 in a timely manner. This increase in complaints is reflected in the most current data (Q4). The upward trend in AF complaints is likely to continue or to show a plateauing over the forthcoming quarters. Positive changes to the AF website and overall communication strategy surrounding the AF service will assist in maintaining low complaints (compared to the volume of crime reports) of this national 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 is recruiting staff to assist in raising the expectations of the service.

Professional Standards and Integrity Report May 2022

Table 3 – Finalised – Cases and Allegations – Q4



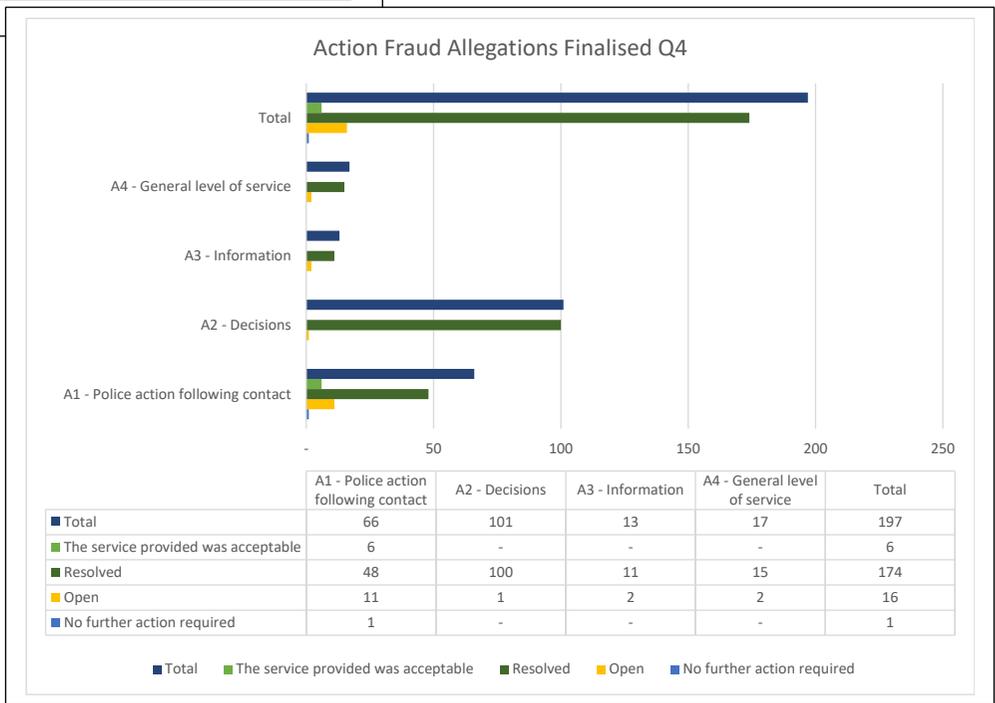
AF Finalised Cases: -

- 155 Action Fraud cases have been finalised during the Q4 2021/22.
- 145 fell outside of Schedule 3.
- 10 fell within Schedule 3.
- Q4 saw finalisations increase of 64 cases (70%) against the previous quarter.

Page 32

AF Finalised Allegations: -

- 178 allegations have been finalised in Q4 2021/22.
- No outcomes were found that the Service provided was not acceptable.
- 174 (98%) allegations were Resolved.
- 16 allegations remained open/live at the end of Q4



Professional Standards and Integrity Report May 2022

**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 or 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 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 and ensuring that complainants receive the most appropriate advice and response.
- 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 is addressed in the FAQs on the AF website).

This page is intentionally left blank

<b>Committee:</b>	<b>Dated:</b>
Safeguarding Sub-Committee (Community and Children’s Services) – For Information	12/05/2022
Police Authority Board – For Information	25/05/2022
Professional Standards and Integrity Committee – For Information	25/05/2022
<b>Subject:</b> City and Hackney Safeguarding Children Partnership (CHSCP) Child Q Practice Review	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	<b>1, 2 and 3</b>
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>No</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>N/A</b>
<b>Report of:</b> Andrew Carter, Director of Community and Children’s Services  Paul Betts, Assistant Commissioner, City of London Police	<b>For Information</b>
<b>Report author:</b> Chris Pelham AD People, Department Community and Children’s Services  DCI Claire Cresswell, City of London Police	

## Summary

In 2020, Child Q, a Black female child of secondary school age, was subject to a strip-search by female police officers from the Metropolitan Police Service (MPS). The search, which involved the exposure of Child Q’s intimate body parts, took place on school premises, without an appropriate adult present, and with the knowledge that Child Q was menstruating. The school is in Hackney. As a result, a Local Child Safeguarding Practice Review was initiated by the City and Hackney Safeguarding Children Partnership (CHSCP). The report was published in March 2022. [\*Local Child Safeguarding Practice Review: Child Q\*](#) concluded that Child Q should never have been strip-searched. The review found that there was an absence of a safeguarding-first approach to the practice of many of the professionals involved that day. The report also concluded that racism was ‘likely an influencing factor’ in the strip-search, and that there was a high level of probability that practitioners were influenced by ‘adultification’ bias. This is where Black and Global Majority children are held to adult standards, but their white peers are less likely to be.

The review makes eight findings and 14 recommendations for practice improvements. Some relate to process, data and guidance: police engagement in the Local Child Safeguarding Practice Review (LCSPR) process (R1), MPS data on strip searches (R2), updating the Department for Education (DfE) guidance for schools on searching, screening and confiscation (R3 & R10), updating the MPS guidance and local policy around Appropriate Adults and the Police and Criminal Evidence Act (PACE) (R4 & R11), and both national police and MPS guidance on strip-searching children (R6), addressing the stop and search guidance (R9).

Other recommendations focus on how the system works. There is a recommendation for the MPS Central East Basic Command Unit (BCU) around engagement with their local stop and search monitoring group (R7) and, the importance of referring children to, or seeking advice from, children's social care where there are concerns about substance misuse (R8). Four recommendations are addressed to the CHSCP. These are likely to have a wider relevance and transferability to other local areas. Three recommendations relate to professional development: ensuring that Child Q and the review is referenced with a specific focus on reinforcing the responsibilities of practitioners to advocate for and on behalf of the children they are working with or who are in their care (R5), develop an awareness-raising programme across schools and colleges about stop and search activity by the police (R12) and, multi-agency 'adultification' training actively focusing on practitioners from school and the police (R13). Recommendation 14 relates to developing an anti-racist charter and practical guides that support the eradicating of racism, discrimination and injustice across its local safeguarding arrangements.

In April, Jim Gamble QPM, Independent Child Safeguarding Commissioner, wrote to all partners of the CHSCP inviting them to map their safeguarding arrangements in respect of the findings and recommendations set out in the review (see Appendix 2).

This report updates Members on the review process, and sets out the initial response and plans to address the recommendations from the City of London Police (CoLP) and City of London Schools, and Community and Children's Services.

### **Recommendation**

Members are asked to:

- Note the report.

## Main Report

### Background

1. In 2020, Child Q, a Black female child of secondary school age, was subject to a strip-search by female police officers from the MPS.
2. The search, which involved the exposure of Child Q's intimate body parts, took place on school premises, without an appropriate adult present, and with the knowledge that Child Q was menstruating.
3. As a result, an LCSPR was initiated by the CHSCP. The report was published in March 2022.
4. [\*Local Child Safeguarding Practice Review: Child Q\*](#) (Appendix 1) concluded that Child Q should never have been strip-searched. The review found that there was an absence of a safeguarding-first approach to the practice of many of the professionals involved that day.
5. The review makes eight findings and 14 recommendations for practice improvement. It concluded that racism was 'likely an influencing factor' in the strip-search and that there was a high level of probability that practitioners were influenced by 'adultification' bias. This is where Black and Global Majority children are held to adult standards, but their white peers are less likely to be.
6. In April, Jim Gamble QPM, Independent Child Safeguarding Commissioner, wrote to all partners of the CHSCP inviting them to map their safeguarding arrangements in respect of the findings and recommendations set out in the review (Appendix 2).
7. This report sets out the initial response to the recommendations from the CoLP and City of London Schools, and Community and Children's Services.

### The Purpose of the Local Child Safeguarding Practice Review (LCSPR)

8. The purpose of the LCSPR is to:

"identify improvements to be made to safeguard and promote the welfare of children. Learning is relevant locally, but it has a wider importance for all practitioners working with children and families and for the Government and policymakers. Understanding whether there are systemic issues, and whether and how policy and practice need to change, is critical to the system being dynamic and self-improving.

Reviews should seek to prevent or reduce the risk of recurrence of similar incidents. They are not conducted to hold individuals, organisations or agencies to account, as there are other processes for that purpose, including through employment law and disciplinary procedures, professional regulation and, in exceptional cases, criminal proceedings. These processes may be carried out alongside reviews or at a later stage.

Employers should consider whether any disciplinary action should be taken against practitioners whose conduct and/or practice falls below acceptable standards and

should refer to their regulatory body as appropriate.”

[Working Together 2018, Chapter 4, page 8](#)

9. The [Child Safeguarding Practice Review Panel](#) (CSPRP) is a national body, not a local one. It is an independent panel responsible for commissioning national reviews of serious child safeguarding cases.
10. When a serious incident becomes known to the safeguarding partners (the Council, the Police and the Clinical Commissioning Group), they must consider whether the case meets the criteria for a local review. This is done through a process known as a Rapid Review.
11. The outcome of the Rapid Review is subsequently submitted to the CSPRP. In Child Q’s case, this was done on 15 January 2021. The delegated decision to instigate the review was made by the CHSCP’s Independent Child Safeguarding Commissioner (ICSC) and ratified by safeguarding partners in line with the CHSCP’s written safeguarding arrangements.
12. The CSPRP met on 26 January 2021 and wrote to the CHSCP on 2 February 2021. Its response is covered in paragraphs 1.7-1.10 of the report of the Review.

### **The Timeline of the Review**

13. The [statement](#) from Jim Gamble QPM, Independent Child Safeguarding Commissioner, provides an overview of the timeline of the review:
  - **11 January 2021:** Child Q first came to the attention of the Independent Child Safeguarding Commissioner and a Rapid Review meeting was convened two days later.
  - **15 January 2021:** The Rapid Review report and the decision to instigate the LCSPR was submitted, as required by statutory guidance, to the CSPRP.
  - **26 January 2021:** The National CSPRP considered the case on 26 January 2021 and responded on 2 February 2021. This response stated: “We noted your decision to carry out a local child safeguarding practice review (LCSPR) but would encourage you to think carefully about whether one is necessary as we felt that this case was not notifiable and did not meet the criteria for an LCSPR.” Despite this suggestion, an LCSPR was initiated and work began at pace.
  - **February–March 2021:** Lead authors were confirmed, a reference panel identified, and a forward plan of key interviews developed. The CHSCP was mindful of the impact on Child Q and, while the family were quickly notified of the review, it was right not to interrupt the immediate support services being provided.
  - **By mid-April 2021:** The review completed interviews with Child Q, her family and the school teachers.

- **May 2021:** The headteacher and Local Authority Designated Officer were interviewed.
- Over the next three months, the review continued to press the MPS for access to the officers involved, or at the very least, their statements. Due to the nature and range of complaints, the Independent Office for Police Conduct (IOPC) had become formally involved.
- **6 July 2021:** The ICSC wrote to the Director General of the IOPC, explaining the situation and asking if he could reconcile the issue of access. The CHSCP was made an 'Interested Party' to the IOPC investigation. This allowed for the lawful sharing of relevant information, which was received in October 2021.
- While eventually resolved, the difficulties encountered in obtaining information from the police was the reason for the review making its first recommendation for the National Child Safeguarding Practice Review Panel and the IOPC.
- Work followed, and advice from the reference panel, research and data allowed for findings and recommendations to be focused and developed.
- **From January 2022:** Fact-checking and final rounds of engagement were carried out, including with the family (and their solicitor), the reference group, the MPS and the IOPC.
- **March 2022:** The review was published.

### **City of London Police (CoLP)**

14. Following the March 2022 publication of *Local Child Safeguarding Practice Review: Child Q*, the CoLP conducted its own internal review of juvenile strip-searches. A senior member of the Professional Standards Directorate conducted a detailed review of all juvenile strip-searches undertaken during the last three years.
15. In the period March 2019 to March 2022 there were nine strip-searches of juveniles undertaken by CoLP officers. The juveniles were all male and aged between 15–17 years old. Three searches were as a result of a further search conducted under Code A PACE 1984. All others were conducted within the custody suite after detention and were authorised post-arrest. Seven of the strip-searches led to a positive outcome (a prohibited item being found).
16. A full report was completed for review by the Assistant Commissioner Betts who is strategic lead for this portfolio. The report will be considered by the City of London Police Renewing and Rebuilding Trust and Confidence Board (chaired by Assistant Commissioner Betts) which will oversee a number of identified learning points. The Board next convenes on 19 May 2022. This will include the consideration of all the recommendations relevant to the police from the *Local Child Safeguarding Practice Review: Child Q* report.

17. A detailed communication has been compiled and made available to all officers to remind them of their powers and the key considerations when undertaking searches, particularly those that are more intimate in their nature, and also those where juveniles are being searched. It details the relevant legislation and provides guidance on process and recording to ensure that all officers comply with the requirements of the Police and Criminal Evidence Act 1984 and Force policies. The communication also discusses 'adultification' and safeguarding considerations that officers must bear in mind. It sets out clear expectations relating to safeguarding and available resources within the Force to support officers in their decision making. This communication has also been sent to all Directorate Heads to disseminate to all Inspectors to ensure that teams receive briefings from their supervisors on this matter.
18. The CoLP review identified changes to the inputting of data to improve our record keeping and audit trail of rationale for relevant decisions. These have been allocated to appropriate leads in the Force to implement.
19. The CoLP has several internal and external working groups providing oversight and scrutiny to stop and search and strip-searches. These include:
  - Professional Standards and Integrity Committee of the Police Authority Board. As part of its remit, this Committee reviews data relating to stop and search and use of force. The committee scrutinises trends and findings and provides feedback, challenge, and asks for further information where required to allow them to intrusively oversee the use of the tactic by the Force. Every Committee Member was given the opportunity to patrol with a uniformed officer from the Local Policing team to witness a stop and search being conducted so that they could better understand the process.
  - Independent Advisory and Scrutiny Group. This group considers the details of individual stop searches and whether there was a lawful reason for the stop, and whether the grounds for the stop were justified. They can view Body Worn Video to better assess the search. They 'dip sample' 10% of searches monthly and also look at trends quarterly. Relevant training was provided to all members to assist them in reviewing stop searches.
  - At an operational level within the Force, line managers provide significant scrutiny. First line supervisors reviews every stop and search record. Additionally a structured dip sampling process requires every level of supervisor completes a review of a minimum number or percentage of searches each month.
  - Statistics on stop and search are presented to the quarterly City of London Police Stop and Search Working Group where they are reviewed against set criteria such as the disproportionality index, positive outcomes and grounds given for the search.

- The HMICFRS conducts reviews of stop searches carried out by the Force. The previous dip sample review established that 92% of searches had acceptable grounds. This placed the Force in the top six forces in England.
- The Force has committed to reviewing all strip-searches of juveniles quarterly. This will be conducted by the Senior Force Leads for stop and search, and custody management.

### **City Of London Schools and Community and Children’s Services**

20. The City of London Corporation has one maintained primary school – The Aldgate School – and 10 sponsored academies as part of the City of London Academies Trust. It also supports three independent schools.
21. In its pursuit of educational excellence, the City Corporation has drawn these schools together, collectively known as 'the City of London Family of Schools'.
22. In addition to the 'Family of Schools', there are two schools and one college located in the City of London – St Paul's Cathedral School, Charterhouse Square School, and David Game College.
23. As noted above in paragraph 6 of this report, Jim Gamble QPM, Independent Child Safeguarding Commissioner, wrote to all Partners of the CHSCP in April inviting them to map their safeguarding arrangements in respect of the findings and recommendations set out in the review (see Appendix 2). This went to all CHSCP schools across Hackney and the City of London and was forwarded to all schools in 'The Family of Schools'.
24. Schools physically based in the City of London operate under the CHSCP governance arrangements. These schools meet on a termly basis as part of the City of London Safeguarding Education Forum – this is hosted by Community and Children’s Services, chaired by the Assistant Director, People, and includes attendance from the City schools’ Designated Safeguarding Leads, as well as officers from Community and Children’s Services, and the Lead Advisor for Safeguarding from the CHSCP.
25. City of London Education Trust schools (Family of Schools) , based in other local authority areas, will operate under their own local authority area Safeguarding Partnership arrangements. However, to provide opportunities to strengthen safeguarding arrangements across the CoL education footprint, the Family of Schools are invited to attend the City of London Safeguarding Education Forum.
26. The next Safeguarding Education Forum in June will be dedicated to reviewing the learning and development requirements for all schools linked to the findings of the report.
27. A more detailed report on the Family of Schools response to Child Q will be presented to the Education Board in June.

28. The following points illustrate some of the actions that the schools have engaged in (or will engage in), in response to the review findings:

- The Aldgate School leadership have reviewed the report and shared learning with senior leaders.
- Significant work has been undertaken by The Aldgate School in relation to anti-racism, safeguarding, and the curriculum.
- Across the Family of Schools, senior leaders have read and shared the report with their leadership teams.
- Reminders have been sent to senior leaders and all staff regarding search policies within schools.
- The review findings have been shared in assemblies with all year groups.
- Staff briefings have been undertaken regarding the case of Child Q.
- Some schools have confirmed that they have written to parents to offer reassurance and an opportunity for further conversations.
- Schools have reviewed the current practice around serious child safeguarding cases in their school in light of the Child Q report.
- Schools have initiated reviews of their current practice and state that they will continue to work with the local Safeguarding Partnership as required.
- Schools noted that they continue to ensure that they use appropriate systems to record all types of police searches.
- Where relevant, schools note that they will continue to liaise with their Safer School Police Officer to ensure that their policy and practice-based systems are up to date.
- Schools will ensure that they include specific items relating to 'adultification' in future training, and explore whole-school activities relating to this topic.
- One school noted that their Senior Leadership Team had reviewed the Child Q report, and the Designated Safeguarding Lead (DSL) led a whole-staff briefing and disseminated a PowerPoint presentation to every class, so they are aware of their rights. The safeguarding team also dropped in to each class to take any questions.
- The DSL and Deputy met with the Student Council on 25 April 2022 to discuss their views on Child Q and what steps to take to reassure Council members.

29. In addition to the schools, colleagues in Community and Children's Services have also engaged in activities following the publication of the review, including:

- Across Community and Children's Services, Senior Leaders have attended a CHSCP-commissioned 'adultification' learning and development session in June 2021.
- There is an expectation that all frontline staff will attend CHSCP-commissioned training regarding 'adultification' in the coming year.

- Reflective briefing sessions took place with staff in the People Directorate following the publication of the report. These were chaired by the Children Social Care Systemic Therapist and provided a safe and supportive environment for staff to consider the findings of the review, and help reflect on and process the difficult messages related to adultification, gender and race.
- Over the last 18 months, staff in the People Directorate and Community and Children’s Services have been engaged in anti-racism development work. This has included: running systemic group-based reflective sessions; action learning sets; establishing a book club for staff that provided the opportunity to work through the book *Me and White Supremacy* by Layla Saad over 25 weeks; our Independent Reviewing Service provided a video message for our children in care and care leavers providing information on how they can receive support from CoL on any issues that are impacting them directly; and managers presented our anti-racism work to the DfE.
- The CoL Multi Agency Child Exploitation (MACE) group, jointly chaired by Children’s Social Care and the CoL Police, reviewed the findings from the report at the April meeting. The implementation of the recommendations by partner agencies will be reviewed via the MACE group to help strengthen safeguarding arrangements specific to child sexual and criminal exploitation.
- Finally, the CHSCP has extended an invitation to all CoL Safeguarding Partners, including CoL schools, to attend the three-day Hackney Anti-racism conference in May 2022.

## Corporate & Strategic Implications

30. Financial implications – there are no financial implications regarding this report. Future training, learning and development activity will be financed within service budgets.
31. Resource implications – as stated above.
32. Legal implications – no legal implications specific to this report.
33. Risk implications – implementation of learning from the recommendations will be reviewed as part of the CHSCP governance arrangements. Any concerns regarding compliance will be escalated through this mechanism.
34. Equalities implications – this report has raised issues in respect of the need to review and ensure effective anti-racist policy and practice is in place across partner agencies. CoLP and CoL schools will be addressing equalities issues and learning from this case as part of their action planning.
35. Climate implications – no climate implications specific to this report.
36. Security implications – no security implications specific to this report.

## Conclusion

37. Following the strip-search by MPS officers of Child Q in a Hackney school in 2020, an LCSPR was initiated by the CHSCP. The report was published in March 2022.
38. [The review – Local Child Safeguarding Practice Review: Child Q](#) – concluded that Child Q should never have been strip-searched. The review found that there was an absence of a safeguarding-first approach to the practice of many of the professionals involved that day.
39. The report also concluded that racism was ‘likely an influencing factor’ in the strip-search and that there was a high level of probability that practitioners were influenced by ‘adultification’ bias. The review made eight findings and 14 recommendations for practice.
40. CoLP and City of London Schools have carried out a range of activities to understand and share learning with colleagues from the review.
41. This report has highlighted activity to date and the plans for future learning.

## **Appendices**

- Appendix 1 – *Local Child Safeguarding Practice Review: Child Q - March 2022*
- Appendix 2 – Mapping Recommendations Template

### **Chris Pelham**

Assistant Director People, Department Community and Children’s Services

T: 020 7332 1636]

E: [chris.pelham@cityoflondon.gov.uk](mailto:chris.pelham@cityoflondon.gov.uk)

### **DCI Claire Cresswell**

City of London Police

[claire.cresswell@city-of-london.pnn.police.uk](mailto:claire.cresswell@city-of-london.pnn.police.uk)



# **Local Child Safeguarding Practice Review**

## **Child Q**

### **March 2022**

Jim Gamble QPM, Independent Child Safeguarding Commissioner

Rory McCallum, Senior Professional Advisor

# Contents

1. Introduction .....	2
2. Background and Context .....	6
<i>Definitions</i> .....	6
More Thorough Searches .....	7
Searches Involving Exposure of Intimate Parts of the Body .....	7
Intimate Searches .....	8
<i>The Day of the Incident</i> .....	8
<i>Previous Incidents of Concern</i> .....	9
<i>The School Context</i> .....	10
<i>Local Facts &amp; Figures</i> .....	10
3. Views of Child Q .....	11
4. Views of Mother and Maternal Aunt .....	12
5. Findings and Recommendations .....	15
<i>Review Question 1: UNCRC Compliance</i> .....	17
<i>Review Question 2: Safeguarding Needs</i> .....	22
<i>Review Question 3: Law and Policy</i> .....	26
<i>Covid-19</i> .....	31
<i>Racism</i> .....	32

# 1. Introduction

- 1.1 In 2020, Child Q, a Black female child of secondary school age, was strip searched by female police officers from the Metropolitan Police Service (MPS). The search, which involved the exposure of Child Q's intimate body parts, took place on school premises, without an Appropriate Adult present and with the knowledge that Child Q was menstruating.
- 1.2 Teachers told the review that on the day of the search they believed Child Q was smelling strongly of cannabis and suspected that she might be carrying drugs. On questioning Child Q, she denied using or having any drugs in her possession. A search of her bag, blazer, scarf, and shoes revealed nothing of significance.
- 1.3 Remaining concerned, teachers sought advice from the Safer Schools Police Officer. Due to the restrictions arising from Covid-19, this officer was not on site. He recommended that the school call 101 and ask for a female officer to attend.
- 1.4 A male and female officer subsequently arrived at the school, followed by another two officers (one of whom was also female). After discussions between the police and teachers, Child Q was escorted to the medical room. She was subsequently strip searched.
- 1.5 No Appropriate Adult was in attendance, teachers remained outside the room and Child Q's mother was not contacted in advance. No drugs were found during either the strip search or a search of the room in which Child Q had been waiting beforehand.
- 1.6 Child Q was later allowed to return home where she disclosed the events to her mother. Child Q described how she had been strip searched whilst menstruating. Due to the level of her distress, Child Q's mother took her to the

family GP who made a referral for psychological support. This led to contact with Hackney Children and Families Services (Hackney CFS).

- 1.7 Given these circumstances, a Rapid Review was initiated by the City & Hackney Safeguarding Children Partnership (CHSCP). The Rapid Review report was submitted to the Child Safeguarding Practice Review Panel<sup>1</sup> (*the Panel*) in early 2021. As part of its response, the Panel made the following suggestion.

*'We noted your decision to carry out a local child safeguarding practice review (LCSPR) but would encourage you to think carefully about whether one is necessary as we felt that this case was not notifiable and did not meet the criteria for an LCSPR.'*

- 1.8 Despite this suggestion, a Local Child Safeguarding Practice Review (*the review*) was nonetheless initiated. The delegated decision to do this was made by the CHSCP's Independent Child Safeguarding Commissioner (ICSC) and ratified by safeguarding partners in line with the CHSCP's written safeguarding arrangements.

- 1.9 In considering the relevant statutory guidance<sup>2</sup>, the overwhelming opinion was that Child Q had been exposed to a traumatic incident and had undoubtedly suffered harm. Whilst there was less certainty about whether the precise definition of a '*serious child safeguarding case*' had been met, there was little doubt that the impact on Child Q had been profound. The repercussions on Child Q's emotional health were obvious and ongoing. Given the context of where and how the search took place, it was impossible not to view these circumstances as anything other than the most serious and significant.

- 1.10 The incident also illustrated unambiguous issues of importance that warranted independent analysis, not least the potential impact of disproportionality and racism and how these factors might have influenced the actions of organisations and individual professionals.

---

<sup>1</sup> <https://www.gov.uk/government/organisations/child-safeguarding-practice-review-panel/about>

<sup>2</sup> Working Together 2018, Chapter 4 para 15-19

1.11 Indeed, reinforcing the gravity with which this case was being viewed, Ofsted's National Director for Social Care and Regional Director for London were engaged by the CHSCP and verbally appraised of its details.

1.12 Terms of Reference were set for the review, with the methodology requiring the following questions to be addressed:

- Was the rationale and practice to strip search Child Q sufficiently attuned to the rights of children as set out in the relevant articles of the United Nations Convention on the Rights of the Child?
- Was practice involving Child Q sufficiently focused on her potential safeguarding needs?
- Is the law and policy, which informs local practice, properly defined in the context of identifying potential risk and furthermore, does law and policy create the conditions whereby practice itself can criminalise and cause significant harm to children?

1.13 To ensure the review had access to relevant expertise, a reference panel including Black and Global Majority Ethnic<sup>3</sup> safeguarding professionals was also convened. Their input has been invaluable in helping to explore and validate the review's findings in the context of anti-racist practice.

1.14 These and other findings are consistent with the overall purpose of reviews. In line with statutory guidance, they are focused upon preventing or reducing the risk of recurrence of similar incidents. The review has not been *'conducted to hold individuals, organisations or agencies to account, as there are other processes for that purpose, including through employment law and disciplinary procedures, professional regulation and, in exceptional cases, criminal proceedings.'*<sup>4</sup>

1.15 With regards to the above, following a formal complaint, Child Q's school swiftly responded to this by way of a Stage 2 investigation. Investigations remain

---

<sup>3</sup> This terminology is used in place of Black and Minority Ethnic (BAME).

<sup>4</sup> [Working Together to Safeguard Children 2018, Chapter 4, para 4.](#)

ongoing by the Independent Officer for Police Conduct (IOPC) into the conduct of the police officers.

- 1.16 The review makes eight findings and 14 recommendations for improving practice.

**Finding 1: The school was fully compliant with expected practice standards when responding to its concerns about Child Q smelling of cannabis and its subsequent search of Child Q's coat, bag, scarf and shoes. This demonstrated good curiosity by involved staff and an alertness to potential indicators of risk.**

**Finding 2: The decision to strip search Child Q was insufficiently attuned to her best interests or right to privacy.**

**Finding 3: School staff deferred to the authority of the police on their arrival at school. They should have been more challenging to the police, seeking clarity about the actions they intended to take. All practitioners need to be mindful of their duties to uphold the best interests of children.**

**Finding 4: School staff had an insufficient focus on the safeguarding needs of Child Q when responding to concerns about suspected drug use.**

**Finding 5: The application of the law and policy governing the strip searching of children can be variable and open to interpretation.**

**Finding 6: The absence of any specific requirement to seek parental consent when strip searching children undermines the principles of parental responsibility and partnership working with parents to safeguard children.**

**Finding 7: The Covid-19 restrictions in place at the time appeared to have frustrated effective communication between school staff and the Safer Schools Officer.**

**Finding 8: Having considered the context of the incident, the views of those engaged in the review and the impact felt by Child Q and her family, racism (whether deliberate or not) was likely to have been an influencing factor in the decision to undertake a strip search.**

## **2. Background and Context**

- 2.1 Beyond the immediate events of the strip search at school, the review has kept information relating to the background and context of Child Q's lived experience to a minimum. The reasons for this are three-fold. Firstly, to protect Child Q's identity and that of her family, secondly, to allow for the report's publication and thirdly, because the review considers much of this information to be largely irrelevant.
- 2.2 To explain this latter point further, the review has been mindful not to detract from the incident itself. It has also been careful not to introduce a perception that there might be a 'rationale' to excuse the actions of some professionals based on who Child Q is, where she lives or what her family circumstances are.
- 2.3 The review is clear that the strip search of Child Q should never have happened and there was no reasonable justification for it.

### **Definitions**

- 2.4 A 'strip search' is a specific practice related to the overall stop and search powers available to the police. There are two distinct types of strip search that are outlined under the Police and Criminal Evidence Act (PACE) 1984.

### More Thorough Searches

- 2.5 A more thorough search, as part of a stop and search, is where an officer deems it necessary that the subject removes more than an outer coat, jacket or gloves. This process does not reveal intimate parts of the body. Powers for this more thorough search are set out under PACE Code A, [paragraph 3.6](#).

*‘Where on reasonable grounds it is considered necessary to conduct a more thorough search (e.g. by requiring a person to take off a T-shirt), this must be done out of public view, for example, in a police van unless paragraph 3.7 applies, or police station if there is one nearby.*

*Any search involving the removal of more than an outer coat, jacket, gloves, headgear or footwear, or any other item concealing identity, may only be made by an officer of the same sex as the person searched and may not be made in the presence of anyone of the opposite sex unless the person being searched specifically requests it.’*

### Searches Involving Exposure of Intimate Parts of the Body

- 2.6 Searches involving exposure of intimate parts of the body are where the person removes all or most of their clothing. They are, by definition, one of the most intrusive forms of search. As with searches involving less intrusion, they must only be used where it is necessary and reasonable, bearing in mind the object of the search.
- 2.7 Consultation with a supervisor is always required prior to such a search<sup>5</sup>. The police officer must be of the same sex as the person being searched and the process must be conducted in accordance with [paragraph 11](#) of PACE Code C, Annex A. Full powers are set out under [PACE Code A, paragraph 3.7](#).

*‘Searches involving exposure of intimate parts of the body must not be conducted as a routine extension of a less thorough search, simply because nothing is found in the course of the initial search.*

---

<sup>5</sup> [College of Policing – Authorised Professional Practice](#)

*Searches involving exposure of intimate parts of the body may be carried out only at a nearby police station or other nearby location which is out of public view (but not a police vehicle).*

- 2.8 During a search involving the exposure of intimate parts of the body, persons are required to remove some or potentially all of their clothing. They can also be required to bend over and spread their legs. The police are allowed to require compliance in this regard if the person is suspected of concealing evidence. This might include, for example, class A drugs or an object that could cause harm. Child Q was searched under this criterion.

### **Intimate Searches**

- 2.9 In addition to these defined 'strip searches', the police can also undertake 'intimate searches'. These involve a physical examination of a person's body orifices other than the mouth. PACE identifies that '*the intrusive nature of such searches means the actual and potential risks associated with intimate searches must never be underestimated*'. It further sets out the specific approach to consent that must be followed prior to any such search being undertaken.

### **The Day of the Incident**

- 2.10 In trying to determine why the events unfolded as they did, inconsistencies in the accounts of those involved have hampered the review's ability to clarify these details with any precision. These variations primarily relate to the initial conversations held between the police and the school, whether school staff knew that Child Q was going to be searched (and to what extent) and who was acting as an Appropriate Adult.
- 2.11 Whilst taking account of interviews and written statements, the review does not draw any firm conclusions about each event in question. Some remain subject to investigation as part of ongoing complaints. That said, the review believes it reasonable to infer the following:

- School staff contacted the police because they remained concerned that Child Q had drugs in her possession. They had searched Child Q to the extent that was permissible, and it is likely they knew a further search of Child Q would be undertaken by the attending officers.
- Indeed, if a potential search wasn't expected, then the instruction for a member of staff to follow Child Q when being taken to another office is unlikely to have been made. This was done to make sure that Child Q didn't attempt to dispose of anything in her possession.
- It is unlikely that the school was informed by the attending police officers of the intention to strip search Child Q.
- It is likely that the importance of the Appropriate Adult role was insufficiently explained to either Child Q or the school staff present. Relevant requirements set out under para 11, Annexe A, Code C of the Police and Criminal Evidence Act 1984 (PACE) appear not to have been followed.
- There is no evidence that the officers consulted with a supervisor prior to the search.
- There is no evidence that Child Q was resistant to the search undertaken by school staff or that there were any indicators in her behaviour that she might be hiding drugs on her person.
- The rationale used by the police to initiate the strip search was primarily based on reports provided by the school – that she had smelt of cannabis, that she had previously smelt of cannabis at school and that someone known to Child Q had previously been excluded for drugs.

## **Previous Incidents of Concern**

2.12 A month before Child Q was strip searched, she was similarly identified by the school as smelling of cannabis. On this occasion Child Q was described by school staff as being 'intoxicated', although on contacting her mother, she explained that Child Q had been studying late the night before and it was this that accounted for her presentation. Such background is relevant to the review given the different approach adopted by the school in managing this earlier

incident (and the likely influence of this event on the actions prior to Child Q being strip searched).

- 2.13 In the school's record log, it is noted that Child Q and her mother were advised that *'if this behaviour continues or that if she is found with weed/drugs on her she will not be able to continue her place with [the school].'* No further action followed by way of exploring this incident further, contacting the police or engaging external agencies for advice and support. Child Q's mother was, however, quickly engaged by school staff to inform her of the concerns.

## The School Context

- 2.14 The most recent inspection of Child Q's school found it to be good with safeguarding effective. There are no known complaints regarding pupil well-being or the overall provision for pupils prior to the incident involving Child Q.
- 2.15 There have never been any similar incidents whereby a child has been strip searched on the school's premises. The review is not alert to any other child having been strip searched in any other local school.
- 2.16 In the school's Stage 2 investigation report, its author commented: *'The involvement of the police in this manner is an irregular occurrence at the Academy. In the 12 months prior to the incident the Academy had not requested police involvement about searches or suspicion of possession of banned/illegal items for students.'*

## Local Facts & Figures

- 2.17 During 2020/2021, there were 299 *'further searches'* conducted in Hackney by local police officers from the Central East BCU of the MPS. The review was advised that *'further searches'* is the terminology used to cover strip search activity, although this does not differentiate between the specific types of searches that can be undertaken.

2.18 Over the same period, 25 children under the age of 18 were subject of 'further searches'. 19 were male and 18 were handcuffed during the process. The reasons for search primarily related to suspicions about drugs (20), followed by weapons (4) and stolen property (1). 22 (88%) of the searches were negative with an outcome of no further action recorded in 20 (80%) of the cases. In terms of ethnicity, (as per the codes used by the police), 15 (60%) of the children searched were Black, 2 were White, 6 Asian and 2 Arab or North African.

### 3. Views of Child Q

3.1 During her engagement with the review, Child Q was spoken to and shared a written account of her experiences. The following statements made by Child Q reflect the significant impact that this incident had upon her.

*"Someone walked into the school, where I was supposed to feel safe, took me away from the people who were supposed to protect me and stripped me naked, while on my period."*

*"...On the top of preparing for the most important exams of my life. I can't go a single day without wanting to scream, shout, cry or just give up."*

*"I feel like I'm locked in a box, and no one can see or cares that I just want to go back to feeling safe again, my box is collapsing around me, and no-one wants to help."*

*"I don't know if I'm going to feel normal again. I don't know how long it will take to repair my box. But I do know this can't happen to anyone, ever again."*

*"All the people that allowed this to happen need to be held responsible. I was held responsible for a smell."*

*“...But I’m just a child. The main thing I need is space and time to understand what has happened to me and exactly how I feel about it and getting past this exam season.”*

*“..... I need to know that the people who have done this to me can't do it to anyone else ever again. In fact so NO ONE else can do this to any other child in their care.”*

*“Things need to change with all organisations involved. Even I can see that.”*

## **4. Views of Mother and Maternal Aunt**

4.1 Child Q’s mother and maternal aunt were also engaged by the review. During interviews, there was a clear sense of shock as to what Child Q had experienced and the ongoing impact upon the whole family. The events themselves have dented the family’s confidence and trust in those professionals tasked with caring for and protecting Child Q.

4.2 There was also an overwhelming perception by the family that Child Q had been let down badly, criminalised, and above all, a view that Child Q was treated differently because she is Black. A sample of their views reflecting the impact of the strip-search are set out below.

4.3 Comments from Child Q’s mother during interview.

*“...the incident that happened (was) treated not as a safeguarding issue. (It was) treated as a criminal matter.”*

*“(Professionals) treated her as an adult. (She was) searched as an adult.”*

*“Child Q is a changed person. She is not eating, every time I find her, she is in the bath, full of water and sleeping in the bath. Not communicating with us as (she) used to, doesn’t want to leave her room, panic attacks at school, doesn’t*

*want to be on the road, screams when sees/hears the police, and we need to reassure her.”*

*“We try to get her to do things and reassure her. Child Q is not the same person. Was a person who liked to be active and get into things. Not now, she has changed. She comes home, goes upstairs in the bedroom and closes the bedroom door. Saying she is doing mock exam studies, she just locks off, saying leave me alone. When sleeping, (she is) screaming in her sleep, I have to watch her.”*

*“At the end of day, things like that happen, is it because of her skin, hair. Why her, now looking at the future, will she be comfortable?”*

*“Child Q was searched by the police and was asked to go back into the exam without any teacher asking her about how she felt knowing what she had just gone through. Their position in the school is being part of the safeguarding team, but they were not acting as if they were a part of that team. This makes me sick - the fact that my child had to take her sanitary towel off and put the same dirty towel back on because they would not allow her to use the restroom to clean herself. I was also wondering if the officers body cameras were on while my child was stripped of her clothes, are they re-watching it?”<sup>6</sup>*

4.4 When questioned, the MPS informed the review that there is no Body Worn Camera recording of the incident.

4.5 Letter from Child Q’s mother to the review.

*“Consider what is happening now diversity and racial equality around Black Lives Matter and what is happening to women out there.”*

*“Do you think it is appropriate for a black girl to be search without a parent or family member, when I send my child to school, I expect teachers to act as a*

---

<sup>6</sup> The MPS informed the review that there is no Body Worn Camera recording of the incident.

*parental substitute. Would allow your child to be strip searched and questioned without consent or a guardian present, for a 15-year-old to be interrogated by multiple unnamed police officers.”*

*“Why doesn’t my daughter deserve the same rights as every other child, is this because they think she is a young girl, with no respect for her parents or adults and no fear of consequences or because she is a black child living in a poor city area.”*

*“As you can see clearly in the incident, they have already pointed out the area that Child Q lives in, they made where we live a boundary for Child Q. Our children have families, have names, have hearts and minds, their lives matter. They wish to be scientists, educators and mathematicians.”*

4.6 Comments from Child Q’s maternal aunt made during interview.

*“I see the change from a happy go lucky girl to a timid recluse that hardly speaks to me...In my personal opinion, they have got a problem with Child Q and the aftermath is that when she sees this individual (a teacher) in school, gets panic attacks. They are the main instigator of the exposure.”*

4.7 Letter from Child Q’s maternal aunt to the review.

*“I cannot express to you how aggrieved I am with the school and the police enforcement officers for exposing Child Q to such an undignified, humiliating, and degrading exposure. No child of her age should have to experience this without due cause.”*

*“Child Q was doing exceptionally well at school, top of the class and getting praised every day for her good work and good conduct. She was even the prefect of her year at one stage. She was progressing well, a happy go lucky child, well loved, and cared for. Then for whatever reason, cracks crept in and she appeared to be singled out by the teachers repeatedly for various things.”*

*“The family do not believe that the officers would have treated a Caucasian girl child who was on her monthly periods in the same way.”*

- *“Child Q was made to take her pad off, something so personal and exposed in such a way to strangers.”*
- *“Child Q was racially profiled due to her being black and her extreme large head of locks.”*
- *“She was made to bend over spread her legs, use her hands to spread her buttocks cheek whilst coughing.”*
- *“She was not permitted to use the toilet despite asking.”*
- *“She is now self-harming and requires therapy. She is traumatised and is now a shell of the bubbly child she was before this incident.”*
- *“From the time she was pulled out of her exam to the time she returned home, she was isolated, not given food or offered water, where is the care.”*
- *“It is now being circulated in her school that she is the big-time drugs seller.”*
- *“All the above is related to the police behaviour towards her.”*

## **5. Findings and Recommendations**

5.1 It has been a relatively straightforward process for the review to conclude that Child Q should never have been strip searched. Across many of the professionals involved that day, there was an absence of a safeguarding first approach to their practice. There were other ways that this incident could and should have been managed, beyond the largely criminal justice response from the police and the disciplinary response from the school.

5.2 Whilst school staff were right to respond to their concerns, the intervention that followed is considered by the review to have been disproportionate and ultimately harmful to Child Q.

- 5.3 Prior to addressing each of the questions as set out in the Terms of Reference, the review makes two supplementary recommendations.
- 5.4 The first, not relating to the experiences of Child Q, involves the LCSPR process itself. This has been made given the significant difficulties experienced by the review team in gaining direct access to the police officers involved in the case.
- 5.5 This was due to their practice being subject to a formal investigation by the IOPC. Whilst eventually resolved through effective collaboration between the IOPC and the CHSCP<sup>7</sup>, the following recommendation is made.

**Recommendation 1:** The Child Safeguarding Practice Review Panel should engage the IOPC with a view to developing national guidance on the IOPC's interface with the Local Child Safeguarding Practice Review process. As a minimum, this should set out the arrangements for securing cooperation, accessing key staff for interview and the requirements for the timely sharing of information.

- 5.6 The second recommendation involves the data submitted to the review by the MPS in respect of strip searches. This lacked specificity on the different types of strip searches, demographics of those searched, locations and timing. The review was informed there was no existing mechanism to retrieve this data without significant operational tasking.

**Recommendation 2:** The MPS should review and revise its recording system for stop and search to ensure it clearly identifies and allows for retrieval of the full range of activity under stop and search powers (including the ability to differentiate between the different types of strip searches undertaken).

---

<sup>7</sup> The CHSCP was designated a formal party to the IOPC investigation in order to facilitate a legal basis for information sharing. Whilst this allowed access to information provided to the IOPC as part of its investigation, none of the officers were engaged in face-to-face interviews.

## Review Question 1: UNCRC Compliance

- 5.7 **Was the rationale and practice to strip search Child Q sufficiently attuned to the rights of children as set out in the relevant articles of the United Nations Convention on the Rights of the Child?**
- 5.8 The United Nations Convention on the Rights of the Child (UNCRC) is the most widely ratified international human rights treaty in history. *'The Convention has 54 articles that cover all aspects of a child's life and set out the civil, political, economic, social and cultural rights that all children everywhere are entitled to. It also explains how adults and governments must work together to make sure all children can enjoy all their rights.'*<sup>8</sup>
- 5.9 The European Convention on Human Rights (ECHR) is an international treaty, in which Member States of the Council of Europe, including the UK, commit to upholding a number of fundamental rights.
- 5.10 As part of the review's analysis, consideration has been given to the relevant articles under both conventions. Firstly, it has examined them in the context of the school's decision to search Child Q.

**Finding 1: The school was fully compliant with expected practice standards when responding to its concerns about Child Q smelling of cannabis and its subsequent search of Child Q's coat, bag, scarf and shoes. This demonstrated good curiosity by involved staff and an alertness to potential indicators of risk.**

- 5.11 The identified concerns about the smell of cannabis, the concern that this was a repeated incident and the additional context about someone known to Child Q<sup>9</sup> all provided a rationale for the school to act. The school also held concerns that if Child Q did have drugs in her possession, then this could present a

---

<sup>8</sup> <https://www.unicef.org.uk/what-we-do/un-convention-child-rights/>

<sup>9</sup> A person known to Child Q had previously been excluded for drugs and there were concerns about this individual and gang affiliation.

potential risk to other pupils in the school. Given these circumstances, there were reasonable grounds for the school to be worried.

- 5.12 Under the UNCRC, the decision of the school to investigate further and conduct a search of Child Q's bag, scarf, coat and shoes reflects compliance with Article 33 (protecting children from the illegal use of drugs and from being involved in the production or distribution of drugs) and Article 3 (best interests).
- 5.13 Practice by the school at this point was also fully in line with its powers defined in government guidance<sup>10</sup>. This describes how school staff can search a pupil for any item if the pupil agrees, alongside setting out the statutory power to search pupils or their possessions, without consent, '*where they have reasonable grounds for suspecting that the pupil may have a prohibited item*'. Prohibited items include illegal drugs.
- 5.14 Actions taken by the school in searching Child Q demonstrated an adherence to obligations under Article 8 of the ECHR. Whilst this defines a pupil's right for respect to their private life, the 'interference' by way of the initial search was fully justified and proportionate.
- 5.15 Whilst evidencing positive practice, the next steps were characterised by a level of ambiguity and a diluted focus on Child Q's safeguarding needs. This is addressed later in the report.
- 5.16 Whilst no recommendations are made in respect of Child Q's experiences at this stage, the review has identified a need for the government's guidance, '*Searching, screening and confiscation - Advice for headteachers, school staff and governing bodies, DfE, January 2018*' to be updated. In the opinion of the review, this guidance could be strengthened by including much stronger reference to the primary need to safeguard children.

---

<sup>10</sup> ['Searching, screening and confiscation - Advice for headteachers, school staff and governing bodies, DfE, January 2018'](#)

- 5.17 As framed, its tone is largely about discipline and is likely to lead front-line staff down this path of practice. By including relevant narrative about, for example, extra-familial risks and contextual safeguarding, this might help concentrate practice on helping and protecting children.
- 5.18 Indeed, the section covering what should happen after a search contains no reference to Keeping Children Safe in Education 2018 or the expectation that schools should escalate their concerns when indicators of abuse, harm or exploitation are identified. Being in possession of drugs is one such indicator, although the only external agency identified in the guidance for contact is the police.
- 5.19 The guidance also includes worryingly outdated terminology that should be urgently corrected. For example, on pages 12 and 13, the guidance refers to ‘*child pornography*’ and ‘*pornographic images of a child*’ respectively.

**Recommendation 3:** The Department for Education should review and revise its guidance on *Searching, Screening and Confiscation (2018)* to include more explicit reference to safeguarding and to amend its use of inappropriate language.

**Finding 2: The decision to strip search Child Q was insufficiently attuned to her best interests or right to privacy.**

- 5.20 There is valid critique about whether the decision and execution of the strip search were consistent with Child Q’s best interests<sup>11</sup> and her right to privacy<sup>12</sup>.
- 5.21 An example of this can be seen in the approach to engaging an Appropriate Adult for Child Q. Practice was ambiguous and appears not to have aligned with the defined legal application of stop and search (concerning searches

<sup>11</sup> Article 3 (best interests of the child) The best interests of the child must be a top priority in all decisions and actions that affect children. UNCRC

<sup>12</sup> Article 16 (right to privacy) Every child has the right to privacy. The law should protect the child’s private, family and home life, including protecting children from unlawful attacks that harm their reputation. UNCRC

involving exposure of intimate parts of the body) as set out by the College of Policing<sup>13</sup>. This guidance states:

*'Unless there is a risk of serious harm to the person or to someone else, there must be a minimum of two persons present in addition to the person being searched. One of those must be the appropriate adult if the person is a child or vulnerable adult unless, in the case of a child, the child and appropriate adult both agree that the adult should not be present during the search.'*

- 5.22 In Child Q's circumstances, whilst two people were present, they were both police officers. In the account of one of these officers seen by the review, they comment that Child Q '*indicated*' that she didn't mind one of the teachers acting as an Appropriate Adult but was uncomfortable about them being in the room. The officer further states that this teacher (and another) '*seemed*' happy to be outside whilst the search was undertaken. 'Indicated' and 'Seemed' do not suggest a thorough process whereby specific clarification was being sought about how Child Q's best interests would be protected.
- 5.23 Indeed, school staff dispute having ever been told about the planned strip search. In this sense, even if they knew they were the Appropriate Adult for Child Q, their ability to effectively advocate for her was seriously undermined.
- 5.24 On initiating the review, the MPS quickly recognised this as an area of improvement, issuing a revised guidance note to its officers across London in February 2021. This reinforced the following requirements with regards to Appropriate Adults.
- *Arrange for an Appropriate Adult to be present in the case of a child or young person or vulnerable adult (except in cases of urgency where there is a risk of harm to the detainee or others).*

---

<sup>13</sup> <https://www.app.college.police.uk/app-content/stop-and-search/legal/legal-application/>

- *If the subject is under 18 and does not wish an Appropriate Adult to be present during the actual search, ensure they explain this in the presence of the Appropriate Adult and obtain the agreement of the Appropriate Adult.*

5.25 Whilst positive, this guidance could be strengthened by fully reflecting the procedure set out under the revised Code C, PACE, Annex A, paragraph 11 (C)<sup>14</sup>.

*'Except in urgent cases ... a search of a juvenile may take place in the absence of the appropriate adult only if the juvenile signifies in the presence of the appropriate adult that they do not want the adult to be present during the search and the adult agrees. A record shall be made of the juvenile's decision and signed by the appropriate adult.'*

5.26 No evidence has been seen by the review indicating that any of the above expectations were actioned by the police during the strip search of Child Q. The review makes the following recommendation:

**Recommendation 4:** The MPS should update its guidance note and local policy to better emphasise the requirements for engaging an Appropriate Adult under the revised Code C, PACE, 1984.

5.27 In terms of the wider responsibility of all practitioners to protect and promote the rights of children, the review makes the following finding:

**Finding 3: School staff deferred to the authority of the police on their arrival at school. They should have been more challenging to the police, seeking clarity about the actions they intended to take. All practitioners need to be mindful of their duties to uphold the best interests of children.**

<sup>14</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/117589/pace-code-c-2012.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/117589/pace-code-c-2012.pdf)

- 5.28 As a learning point, this has been fully accepted by the school staff involved. Many reflected their sadness and disappointment at what Child Q had experienced, with comments made as part of the school's Stage 2 investigation report echoing these feelings:

*"In hindsight I put my trust in the law; I know now that I need to understand the law better... For example, insisting on staying with a student at all times..."*

*"This is the hardest thing that we've had to go through and for anyone to think that the school might be complicit is very stressful and difficult to deal with."*

*"In my experience with police [at her previous schools], where there has been a suspicion of carrying drugs or a weapon, and police found it necessary to conduct a search, it would only be a 'pat down'. I have known drugs to be found in socks or a waistband as I had witnessed that before, twice in my career. I have never known any more than that on site or known a student to be taken off site."*

*"I am an experienced Designated Safeguarding Lead with over 6 years' experience of safeguarding and liaising with the police to support young people. I have never known, nor would I condone a strip search of a young person on a school site."*

<p><b>Recommendation 5:</b> The CHSCP should review and revise its awareness raising and training content to ensure the Child Q case is referenced, with a specific focus on reinforcing the responsibilities of practitioners to advocate for and on behalf of the children they are working with / who are in their care.</p>
---

## **Review Question 2: Safeguarding Needs**

- 5.29 Was practice involving Child Q sufficiently focused on her potential safeguarding needs? In circumstances where young people are being engaged due to concerns about drug use / possession, is the safeguarding of children a recognised and evidenced priority in practice?

- 5.30 Concerns about strip searching children are not new, having previously attracted scrutiny from a range of different sources. Whilst not practical to highlight every relevant article or document, the following provides a snapshot of some of this material.
- 5.31 In 2014, a report by Joe Sandler Clarke<sup>15</sup> for the Guardian newspaper identified that *'...4,638 children aged between 10 and 16 were asked to remove their clothes and then searched by police between April 2008 and the end of last year. Just over a third were released by police without charge.'*
- 5.32 This article also highlighted the attempts of Julian Huppert, a Liberal Democrat MP for Cambridge who unsuccessfully campaigned for children to be strip searched only if an adult other than police officers was present.
- 5.33 In 2015, Just for Kids Law and Children's Rights Alliance for England (CRAE) published a briefing note<sup>16</sup> detailing their serious concerns about an *'alarming increase in the number of children being strip searched by the police'*. This note also highlighted concerns that in 45% of strip searches of children, no Appropriate Adult was present.
- 5.34 More recently, the practice of strip searching within the CHSCP's footprint has also been critiqued. Whilst involving an adult, the case of Dr Koshka Duff<sup>17</sup> evidences the impact and trauma that can be caused when practice falls well outside of defined standards.
- 5.35 Whilst some may argue that the strip searching of children should never be done at all, the review acknowledges its place in practice, with the caveat that this needs to be firmly embedded in a culture that addresses the safeguarding needs of children.

---

<sup>15</sup>[Metropolitan police strip searched more than 4,500 children in five years](#), Joe Sandler Clarke, The Guardian, March 2014

<sup>16</sup><http://www.crae.org.uk/media/76504/FINAL-Strip-Searching-at-Police-Station-Briefing.pdf>

<sup>17</sup><https://www.bbc.co.uk/news/uk-60141559>

- 5.36 The senior leaders at both the school and the police have fully acknowledged they could and should have done better in this regard. It is accurate to describe the senior leadership teams as being appalled at what Child Q experienced.
- 5.37 If children are suspected of carrying drugs or weapons, it is more likely than not that they are being exploited in some way or form. So, whilst stop and search powers '*enable officers to allay or confirm suspicions about individuals without exercising their power of arrest.*'<sup>18</sup> – they should equally be used as a tool to identify risk and give children the help and protection they might need.
- 5.38 Taking a binary approach as to whether a crime has been committed or not runs the risk that important aspects of a child's life will be missed. Important aspects that may make the difference between that child being protected or not.
- 5.39 In terms of the strip search of Child Q, practice that day appears to have been far too weighted towards a criminal justice response. This may be explained in part by the deference of school staff to the police. It might relate to the relative junior police staff involved or the fact that officers didn't seek the advice of their supervisor. It might also relate to elements of disproportionality and racism leading those involved to make certain assumptions about Child Q and what response was required.
- 5.40 It was also the lack of action taken after the strip search that shows Child Q was primarily being seen as 'the risk' as opposed to being 'at risk'. Because of this, little to no thought was given as to whether a referral to external agencies might be required. Indeed, if the rationale to strip search Child Q was based on fears about exploitation, then it should have followed that this concern was escalated as a safeguarding referral<sup>19</sup>. As it was, Child Q was sent home in a taxi.

---

<sup>18</sup> [Revised code of practice for the exercise by: Police Officers of Statutory Powers of stop and search, Home Office 2014](#)

<sup>19</sup> The MPS did create a Merlin report, however, this was RAG rated as BLUE. These are not ordinarily submitted to Hackney CFS as risk is assessed as not being a factor. The Merlin was received by Hackney CFS 14 days later as part of a request for information from the police following the referral from Health. The Merlin made no reference to the strip search.

**Recommendation 6:** Relevant police guidance (both local and national) governing the policy on strip searching children should clearly define a need to focus on the safeguarding needs of children and follow up actions that need to be considered by way of helping and protecting children at potential risk.

**Recommendation 7:** The Central East BCU should engage the local stop and search monitoring group, ACCOUNT, and other representative bodies to consider the lessons from this review and how the effectiveness of safeguarding (as part of stop and search practice) can be overseen through their respective activities.

**Finding 4: School staff had an insufficient focus on the safeguarding needs of Child Q when responding to concerns about suspected drug use.**

- 5.41 When evaluating practice by the school, lessons also emerge about the need to maintain a clear line of sight on the safeguarding needs of children. Neither the incident of the strip search nor the previous concerns about Child Q smelling of cannabis resulted in any contact with external agencies.
- 5.42 Practice during both these incidents was similarly binary in approach, with the focus appearing to be on whether Child Q had breached the rules as opposed to what the alleged substance misuse might mean for her safety and welfare. The review makes the following finding in this respect:

**Recommendation 8:** Where any suspicion of harm arises by way of concerns for potential or actual substance misuse, a safeguarding response is paramount. Practitioners should always contact Children's Social Care to make a referral or seek further advice in such circumstances.

### Review Question 3: Law and Policy

- 5.43 Is the law and policy, which informs local practice, properly defined in the context of identifying potential risk and furthermore, does law and policy create the conditions whereby practice itself can criminalise and cause significant harm to children?

**Finding 5: The application of the law and policy governing the strip searching of children can be variable and open to interpretation.**

- 5.44 Home Office guidance<sup>20</sup> explains that the use of powers relating to stop and search '*must be used fairly, responsibly, with respect for people being searched and without unlawful discrimination*'. Under the Equality Act 2010, section 149, officers also have '*a duty to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, to advance equality of opportunity between people who share a 'relevant protected characteristic' and people who do not share it, and to take steps to foster good relations between those persons.*' It further emphasises section 11 of the Children Act 2004 that requires chief police officers and other specified persons and bodies '*to ensure that in the discharge of their functions they have regard to the need to safeguard and promote the welfare of all persons under the age of 18.*'
- 5.45 The Home Office policy framework also acknowledges that if the fundamental principles (governing the discharge of stop and search powers) are not observed, the use of powers to stop and search '*may be drawn into question*'. For any search undertaken by the police, the guidance is clear that it must be based on reasonable grounds for suspicion that the person has a particular article in their possession<sup>21</sup>.
- 5.46 Whilst there is no disagreement with many aspects of this guidance or the broad principles of the law, it is here that the review believes further emphasis could help support improved practice with children.

---

<sup>20</sup> [Revised code of practice for the exercise by: Police Officers of Statutory Powers of stop and search, Home Office 2014](#)

<sup>21</sup> Except when officers are authorised under section 60 Criminal Justice and Public Order Act 1994.

- 5.47 Indeed, with regards to Child Q’s experiences, having a previous associate who used drugs and being noted to have smelt of cannabis twice, should not have led an officer to conclude a strip search on school grounds was the right course of action. This and subsequent actions did not have regard to Child Q’s safeguarding or welfare. They were not the most proportionate tool available, and the extent of the strip search did not keep the degree of intrusion to the minimum.
- 5.48 It is also worth highlighting the IOPC finding<sup>22</sup> of a complaint in September 2020 that emphasised ‘*the use of the smell of cannabis as a single ground is not good practice as set out in the College of Policing’s Authorised Professional Practice on stop and search.*’
- 5.49 Whilst fully acknowledging the complexities that face front-line policing and the challenges in making definitions ‘too tight’, it seems to the review that better guidance and training covering ‘reasonable grounds’ would benefit decision making, particularly where this involves children. Practice was undertaken by officers believing they were operating in line with law and policy. Even by doing so, their actions arguably criminalised Child Q and caused her significant harm.

**Recommendation 9:** The MPS should engage The College of Policing to explore potential improvements to the guidance concerning reasonable grounds involving stop and search activity with children.

**Finding 6:** The absence of any specific requirement to seek parental consent when strip searching children undermines the principles of parental responsibility and partnership working with parents to safeguard children.

- 5.50 A clear theme of practice on the day of the strip search was the lack of any parental engagement. One account from the police states that Child Q was asked if she wanted her mother to be contacted, which they say she declined.

<sup>22</sup> <https://www.policeconduct.gov.uk/news/iopc-upholds-cyclist%E2%80%99s-stop-and-search-complaint-against-metropolitan-police-officer>

Child Q disputes this and states that she did in fact ask for her mother on both this and other occasions that day. In the opinion of the review, little thought appears to have been given to the importance of contacting someone with parental responsibility for Child Q.

5.51 This was first seen in the school's response. Despite Child Q's mother being contacted following the previous incident, this wasn't done immediately on this occasion. It is likely that the involvement of the police influenced this being considered in the depth that would have reflected best practice. School staff appear to have deferred to the decisions of the police. That said, the DfE guidance on searching screening and confiscation<sup>23</sup>, is also light on the inclusion of parental consent as an issue of importance. Section 16 of this guidance includes the following relevant statements:

- *'Schools are not required to inform parents before a search takes place or to seek their consent to search their child'*. The review agrees with this position.
- *'There is no legal requirement to make or keep a record of a search'*. This statement is permissive and whilst likely to be accurate from a legal sense, it runs the risk of promoting poor practice. There will be equally no legal impediment to recording a search. Any guidance that steers practitioners away from making records on safeguarding matters is poor and should be changed.
- *'Schools should inform the individual pupil's parents or guardians where alcohol, illegal drugs or potentially harmful substances are found, though there is no legal requirement to do so.'* In the absence of this document sufficiently referencing the requirement to safeguard children and engage external agencies, this point needs strengthening. Whilst noting that schools should inform parents or guardians, permissive statements such as this risk schools not doing anything. In Child Q's case, she was the one who had to tell her mother she had been searched by the school and

---

<sup>23</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/674416/Searching\\_screening\\_and\\_confiscation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf)

stripped searched by the police. In the opinion of the review, this ‘legally permissible practice’ is not good practice.

**Recommendation 10:** Alongside Recommendation 3, the Department for Education should review and revise its guidance on *Searching, Screening and Confiscation (2018)* to include much stronger reference to the importance of keeping records and engaging parents as part of best safeguarding practice.

5.52 In terms of the strip search of Child Q, her mother was neither engaged to seek consent nor informed by the police that the search was going to take place or had taken place. In the opinion of the review this was poor practice.

5.53 However, as set out within PACE 1984, there is no specific requirement to gain parental consent prior to a strip search – even those that might involve the exposure of intimate parts of the body. For intimate searches, this position is different. Annexe A, 2B of the Revised Code C, PACE 1984 states:

*‘In the case of a juvenile or a vulnerable person, the seeking and giving of consent must take place in the presence of the appropriate adult. **A juvenile’s consent is only valid if their parent’s or guardian’s consent is also obtained** unless the juvenile is under 14, when their parent’s or guardian’s consent is sufficient in its own right.’*

5.54 Both the review and the reference group struggled to understand the rationale behind these differing approaches to consent. On the face of it, the law appears to suggest that the requirement for a child to expose their intimate body parts is insufficiently significant to require their parents to be told it is going to happen.

5.55 This fundamentally fails to acknowledge the dehumanising and traumatic impact that such searches can have on children, and again, the important role that parents / carers have in terms of protecting their own children. It potentially minimises the ability of parents / carers to provide immediate support. The

review struggled to see how the absence of any requirement to even tell parents that a strip search was going to take place could be in a child's best interests.

**Recommendation 11:** The Home Office and the National Police Chiefs Council should seek to strengthen the Revised Code C, PACE 1984 to better define the engagement of parents / carers / guardians when strip searches that involve the exposure of intimate parts of the body are undertaken on children.

- 5.56 The review considers that benefits could also be accrued by educating and empowering young people to better understand their rights in respect of stop and search activity by the police.
- 5.57 Indeed, Child Q was fully compliant with the school's search of her possessions and compliant with the request to be strip searched by the police. Whilst not advocating she should have been disruptive, she appeared unable to challenge any of the actions being undertaken and is unlikely to have known about what she could expect, even by way of procedure (i.e. such as the requirement for both her and an Appropriate Adult to agree and sign for the Appropriate Adult not to be present during the strip search). She responded in this way, despite being adamant that she had no drugs in her possession and being upset about not being allowed to take her mock examination.
- 5.58 The reference panel considered the arrival of the police at school and how Child Q might have reacted to this trauma. Whilst well-known behavioural responses are the fight, flight, or freeze responses, Child Q may have experienced a fawn response<sup>24</sup>. Flight includes running away, fight is to challenge aggressively, and freeze is when someone becomes unable to move physically or make choices. The fawn response involves rapidly moving to try to please a person to avoid any conflict. This could have accounted for Child Q's compliance.
- 5.59 Whilst only a hypothesis, the circumstances nonetheless highlight evidence of where improvements could be made in directly raising awareness and

---

<sup>24</sup> <https://www.psychologytoday.com/us/blog/addiction-and-recovery/202008/understanding-fight-flight-freeze-and-the-fawn-response>

knowledge amongst children about their rights. A range of material<sup>25</sup> already exists that could be developed in this context.

**Recommendation 12:** The CHSCP should engage ACCOUNT, Safer Schools Police Officers and other community organisations to develop an awareness raising programme across schools and colleges about stop and search activity by the police.

## Covid-19

**Finding 7: The Covid-19 restrictions in place at the time appeared to have frustrated effective communication between school staff and the Safer Schools Officer.**

- 5.60 The Safer Schools Police Officer (SSPO) was not on the school premises due to the Covid-19 restrictions in place at the time. In usual circumstances, it is likely that the SSPO would have been directly involved with Child Q and this may have led to a different response. Whilst only a hypothesis, the review is alert to the fact that the attending officers that strip searched Child Q had no experience of working in schools.
- 5.61 The SSPO's absence may also have contributed to a dilution in the accuracy of information sharing and a collective understanding about what was being asked for and what would happen. There remain differing accounts provided by teachers and the SSPO as to what exactly the police were being contacted for and the expectations of their subsequent actions.
- 5.62 Whilst no specific recommendations are made in respect of Covid-19 arrangements, there is relevant learning to be accrued about how the SSPO role can help promote a wider understanding about stop and search powers and how these relate to children.

---

<sup>25</sup> [https://www.london.gov.uk/sites/default/files/kyr\\_inner\\_april\\_19\\_v5\\_new.pdf](https://www.london.gov.uk/sites/default/files/kyr_inner_april_19_v5_new.pdf)

## Racism

**5.63 Finding 8: Having considered the context of the incident, the views of those engaged in the review and the impact felt by Child Q and her family, racism (whether deliberate or not) was likely to have been an influencing factor in the decision to undertake a strip search.**

5.64 The actions of professionals involved on the day of the strip search have been evaluated in the context of Child Q's ethnicity and whether she was treated differently because she is Black.

5.65 The importance of this line of enquiry is starkly reflected in several events that took place around the same time. Significantly, some six months prior, George Floyd was tragically killed in the USA and there were repercussions around the globe, including in the UK. It brought into sharp focus some of the negative experiences that Black and Global Majority Ethnic communities can experience when interacting with the police. Valid questions have been raised about racism within the police and other agencies, the priority given to tackling this and whether organisational commitment ever rises above the rhetoric.

5.66 The strip search of Child Q also took place two months before HMICFRS<sup>26</sup> published its report into the disproportionate use of police powers<sup>27</sup>. In her introduction to the HMICFRS report, Wendy Williams CBE, HM Inspector of Constabulary stated:

*'Some of the most intrusive and contentious police powers are those that allow the police to use force and to stop and search people. Some view stop and search as a valuable tool in the fight against crime, while others argue that its use has little effect on crime rates and can in fact increase disorder. For some, particularly Black, Asian and Minority Ethnic people, it can reinforce the perception that there is a culture of discrimination within the police. And, now*

---

<sup>26</sup> Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services

<sup>27</sup> [Disproportionate use of police powers - A spotlight on stop and search and the use of force, HMICFRS Feb 21](#)

*that we have some long-awaited data on the police use of force, similar concerns are arising about this area of practice.'*

- 5.67 In framing the rationale for this finding, the review has intentionally avoided the use of '*unconscious bias*'. In the opinion of both the review and its reference group, as a term, this somewhat excuses the actions of those involved. It gives the perception that agencies and its practitioners aren't accountable for what they say or do and that they are unable to pause, reflect and consciously control their actions. It similarly suggests that the behaviour and culture within organisations can't be changed. The review disagrees.
- 5.68 Furthermore, Child Q and her family strongly believe that the strip search of Child Q was a racist incident. Whilst acknowledging the ongoing debate concerning definitions<sup>28</sup>, the review and reference group were clear that the perception of the victim is central to how racism is defined.
- 5.69 Indeed, the review and reference panel held a firm view that had Child Q not been Black, then her experiences are unlikely to have been the same. This view is broadly supported when looking at the disproportionality evidenced in a previous inspection of custody suites in the MPS. Undertaken by HMICFRS and HM Inspectorate of Prisons in 2018<sup>29</sup>, this inspection found clear evidence of a disproportionate approach in this area of practice.

*'Force data indicated that the numbers of strip searches were high and included many children and a significantly higher proportion of black and minority ethnic detainees compared against the overall throughput. We concluded that overall not all strip searches were warranted or properly justified.'*

- 5.70 The full reasons behind why racism continues to feature in professional safeguarding practice are without doubt wide-ranging and complex. The review is simply unable to de-construct all these areas within this report.

---

<sup>28</sup> [Commission on Race & Ethnic Disparities 2021](#)

<sup>29</sup> [Metropolitan Police Service police custody suites, Jan 2019](#)

- 5.71 That said, one feature believed to have a significance to the experience of Child Q is that of adultification bias. This concept is where adults perceive Black children as being older than they are. It is *'a form of bias where children from Black, Asian and minoritised ethnic communities are perceived as being more 'streetwise', more 'grown up', less innocent and less vulnerable than other children. This particularly affects Black children, who might be viewed primarily as a threat rather than as a child who needs support'*<sup>30</sup>.
- 5.72 A US study by Georgetown Law's Center on Poverty and Inequality in 2017<sup>31</sup> found that Black girls as young as five years old were seen *'as being less in need of protection and nurturing compared to their white counterparts.'* Research also showed that Black girls were 2.7 times more likely to be referred to the juvenile justice system, 2 times more likely to be disciplined for minor violations at school and 20% more likely to be charged with a crime. Whilst a US study, these experiences won't be isolated there.
- 5.73 In reflecting on how adultification bias might have been evident in practice with Child Q, this can be seen in the fact that she received a largely criminal justice and disciplinary response from the adults around her, *'rather than a child protection response'*. This firmly echoes the findings of Davis and Marsh, 2020<sup>32</sup>. The review believes there to be a high level of probability that practitioners were influenced in this regard. The disproportionate decision to strip search Child Q is unlikely to have been disconnected from her ethnicity and her background as a child growing up on an estate in Hackney.
- 5.74 Recognising the need to immediately influence practice in this regard, the CHSCP commissioned a 12-month programme of multi-agency training sessions on adultification bias. Initially delivered to senior leaders across the safeguarding partnership, this training covers the broad concepts of racism, intersectionality and adultification bias, helping practitioners understand notions

---

<sup>30</sup> <https://learning.nspcc.org.uk/safeguarding-child-protection/children-from-black-asian-minoritised-ethnic-communities#heading-top>

<sup>31</sup> <https://www.law.georgetown.edu/news/research-confirms-that-black-girls-feel-the-sting-of-adultification-bias-identified-in-earlier-georgetown-law-study/>

<sup>32</sup> Davis, J. and Marsh, N. (2020) Boys to men: the cost of 'adultification' in safeguarding responses to Black boys, *Critical and Radical Social Work*, 8(2): 255–259.

of vulnerability and childhood and how these are applied to some children more than others. Specific sessions have been held for the police to facilitate maximum attendance, with scheduled sessions also set up for schools.

- 5.75 The review is also alert to significant activity ongoing across the partnership to create the right conditions for anti-racist practice to thrive and be the norm. Whilst safeguarding partners recognise there is more to do, the review acknowledges both the leadership commitment supporting this work and the rapid training response as positive practice. It makes the following two recommendations:

**Recommendation 13:** The CHSCP should continue with its rolling programme of multi-agency adultification training. Participation should be actively focused on practitioners from the police and schools, with the Training, Learning & Development Sub group developing a process to specifically evaluate impact across these sectors.

**Recommendation 14:** The CHSCP should expedite its work on developing an anti-racist charter and practical guides that support the eradicating of racism, discrimination and injustice across its local safeguarding arrangements.

#	Recommendation	Activity undertaken before incident involving Child Q	Activity undertaken following incident involving Child Q and pre-publication of report	Planned Activity
1	<p><b>ANY RELATED ACTIVITY INVOLVING ENGAGEMENT WITH THE NATIONAL CSPRP AS PART OF THE SYSTEM FOR REVIEWING SERIOUS CHILD SAFEGUARDING CASES</b></p> <p>The Child Safeguarding Practice Review Panel should engage the IOPC with a view to developing national guidance on the IOPC's interface with the Local Child Safeguarding Practice Review process. As a minimum, this should set out the arrangements for securing cooperation, accessing key staff for interview and the requirements for the timely sharing of</p>			
2	<p><b>ANY RELATED ACTIVITY INVOLVING RECORDING AND OVERSIGHT OF ALL TYPES OF POLICE SEARCHES INVOLVING CHILDREN.</b></p> <p>The MPS should review and revise its <b>recording system for stop and search</b> to ensure it clearly identifies and allows for retrieval of the full range of activity under stop and search powers (including the ability to differentiate between the different types of strip searches undertaken).</p>			
3	<p><b>ANY RELATED ACTIVITY INVOLVING GUIDANCE / POLICY / PROCEDURE FOR SCHOOLS AND OVERSIGHT OF SCREENING, SEARCHING &amp; CONFISCATION</b></p> <p>The Department for Education should review and revise its <b>guidance on Searching, Screening and Confiscation (2018)</b> to include more explicit reference to safeguarding and to amend its use of inappropriate language.</p>			
4	<p><b>ANY RELATED WORK CONCERNING THE USE OF APPROPRIATE ADULTS IN ANY CONTEXT</b></p> <p>The MPS should update its <b>guidance note and local policy to better emphasise the requirements for engaging an Appropriate Adult</b> under the revised Code C, PACE, 1984.</p>			
5	<p><b>ANY RELATED ACTIVITY COVERING PRACTITIONER UNDERSTANDING OF THE PRINCIPLES OF SAFEGUARDING FIRST (INCLUDING DISEMINATING LESSONS FROM PREVIOUS REVIEWS), CHALLENGE &amp; ESCALATION, ROLES AND RESPONSIBILITIES &amp; PARAMOUNT FOCUS ON CHILDREN</b></p> <p>The CHSCP should review and revise its awareness raising and training content to ensure the Child Q case is referenced, with a specific focus on <b>reinforcing the responsibilities of practitioners to advocate for and on behalf of the children they are working with / who are in their care.</b></p>			
6	<p><b>ANY RELATED WORK INVOLVING POLICY, GUIDANCE, TRAINING, OVERSIGHT OF ALL SEARCH ACTIVITY INVOLVING CHILDREN.</b></p> <p>Relevant police guidance (both local and national) governing the <b>policy on strip searching children</b> should clearly define a need to focus on the safeguarding needs of children and follow up actions that need to be considered by way of helping and protecting children at potential risk.</p>			
7	<p><b>ANY RELATED WORK COVERING ENGAGEMENT / INVOLVEMENT WITH COMMUNITY ORGANISATIONS AND OTHER PARTNERS TO OVERSEE POLICE SEARCH ACTIVITY INVOLVING CHILDREN</b></p> <p>The Central East BCU should engage <b>the local stop and search monitoring group, ACCOUNT, and other representative bodies</b> to consider the lessons from this review and how the effectiveness of safeguarding (as part of stop and search practice) can be overseen through their respective activities.</p>			

8	<p><b>ANY RELATED WORK INVOLVING GUIDANCE, TRAINING, SUPPORT ON PROFESSIONAL RESPONSE TO SUSPECTED / KNOWN SUBSTANCE MISUSE BY CHILDREN.</b></p> <p>Where any suspicion of harm arises by way of <b>concerns for potential or actual substance misuse</b>, a safeguarding response is paramount. Practitioners should always contact Children's Social Care to make a referral or seek further advice in such circumstances.</p>			
9	<p><b>ANY ACTIVITY - SUCH AS DEVELOPING GUIDANCE / TRAINING ON WHAT CONSTITUTES REASONABLE GROUNDS FOR INITIATING A SEARCH OF A CHILD</b></p> <p>The MPS should engage The College of Policing to explore <b>potential improvements to the guidance concerning reasonable grounds involving stop and search activity with children.</b></p>			
10	<p><b>ANY RELATED WORK ON RECORD KEEPING AND PARENTAL ENGAGEMENT WHEN WORKING WITH CHILDREN.</b></p> <p>Alongside Recommendation 3, the Department for Education should review and revise its guidance on Searching, Screening and Confiscation (2018) to include much stronger reference to the importance of <b>keeping records and engaging parents as part of best</b></p>			
11	<p><b>AS ABOVE</b></p> <p>The Home Office and the National Police Chiefs Council should seek to strengthen the Revised Code C, PACE 1984 to better define the <b>engagement of parents / carers / guardians</b> when strip searches that involve the exposure of intimate parts of the body are undertaken on children.</p>			
12	<p><b>ANY WORK UNDERTAKEN WITH CHILDREN TO PROMOTE THEIR UNDERSTANDING OF THEIR RIGHTS IN TERMS OF STOP &amp; SEARCH</b></p> <p>The CHSCP should engage ACCOUNT, Safer Schools Police Officers and other community organisations to develop an <b>awareness raising programme across schools and colleges about stop and search activity by the police.</b></p>			
13	<p><b>ANY TRAINING MADE AVAILABLE ON ADULTIFICATION / RACISM + NUMBERS TRAINED</b></p> <p>The CHSCP should continue with its rolling programme of multi-agency <b>adultification training</b>. Participation should be actively focused on practitioners from the police and schools, with the Training, Learning &amp; Development Sub group developing a process to specifically evaluate impact across these sectors.</p>			
14	<p><b>ANY RELATED ACTIVITY INVOLVING THE DEVELOPMENT / PROMOTION OF ANTI-RACIST PRACTICE</b></p> <p>The CHSCP should expedite its work on developing an <b>anti-racist charter and practical guides</b> that support the eradicating of racism, discrimination and injustice across its local safeguarding arrangements.</p>			

<b>Committee(s):</b> Strategic Planning and Performance Committee  Police Authority Board  Professional Standards and Integrity Committee	<b>Dated:</b> 5 May 2022  25 May 2022  25 May 2022
<b>Subject:</b> Update on Violence against Women and Girls (VAWG) activity	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	1- People are safe and feel safe
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N/A</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>N/A</b>
<b>Report of: Commissioner of Police</b> Pol 20-22	<b>For Information</b>
<b>Report author:</b> DCS Rebecca Riggs; Chief Inspector Carly Humphreys, Professionalism and Trust	

### Summary

The purpose of this report is to provide an update for Members of the Strategic Planning and Performance Committee (SPPC), Police Authority Board (PAB) and Professional Standards and Integrity Committee (PSIC) on strategic progress made by the City of London Police (CoLP) in relation to Violence Against Women and Girls (VAWG)<sup>1</sup>. 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 includes work ongoing with partners including the City of London Corporation.

### Recommendation(s)

Members are asked to note the report

---

<sup>1</sup> 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 Committees in November 2021 and February 2022.

### Current Position

#### Key Milestones since the last update (February – April 2022)

- The first VAWG [strategic-delivery-plan.pdf \(cityoflondon.police.uk\)](#) has now been published for CoLP and a copy is attached at Appendix A. A feedback email address [VAWGFeedbackPublic@cityoflondon.police.uk](mailto:VAWGFeedbackPublic@cityoflondon.police.uk) has been set up for the public to provide their views on the plan as well as any ideas regarding what else they would like to see the CoLP doing in relation to Violence Against Women and Girls. This is a Year 1 report which will be refreshed annually. In line with the NPCC guidance, the Year 1 report will remain policing-centric, however Year 2 and Year 3 reports will focus much more on partnership work.
- Creation of an internal VAWG Action Plan which outlines tactical delivery, demonstrates what progress has been made to date, how performance will be scrutinised and provides an objective RAG grading<sup>2</sup> for the progress made in each area of activity. A baseline assessment of performance has been completed to track improvements over time, scrutiny of this will be achieved within our monthly Rebuilding Trust and Confidence meetings Chaired by Assistant Commissioner Betts.
- Establishment of a regional working group alongside the British Transport Police and the Metropolitan Police Service.
- Creation of a draft VAWG Problem Profile which provides data analysis regarding thematic areas; such as crime types, locations, offender types and temporal analysis. It provides recommendations regarding how we can improve our policing response and where resources would be most effectively utilised to tackle VAWG.

### National

2. Policing progress concerning VAWG continues with pace nationally. All forces remain in close working alignment with the NPCC (National Police Chiefs Council) against the National Framework for Delivery (Year 1). Regular weekly NPCC taskforce meetings bring together strategic and tactical leads to share working practices and disseminate national headlines.

---

<sup>2</sup> RAG denotes a 'Red, Amber, Green' grading of progress. This grading has been awarded through an initial internal benchmarking process. For future quarterly benchmarking processes, this will be done with the IASG to ensure that there is external scrutiny.

3. Along with all forces nationally, the CoLP has submitted its VAWG Strategic Delivery Plan, written in consultation with the City of London Corporation (CoLC) and internal stakeholders, and its VAWG Action Plan to the NPCC. These will formulate national performance benchmarking for VAWG and promulgate best practice.
4. The CoLP Commissioner and Det Chief Supt Head of Professionalism and Trust have met with DCC Maggie Blyth (NPCC VAWG lead) this month and discussed a number of opportunities for CoLP to enhance national VAWG delivery, such as:
  - Opportunities for CoLP secondments to the NPCC to work on the VAWG portfolio.
  - Supporting the national online VAWG Problem Profile using National Fraud Intelligence Bureau (NFIB) data sets.
  - Developing upon City business relationships, such as licensing and hospitality, which could have national influence.
  - Learning from *good industry practice* within the National Economic Crime Victim Care Unit (NECVCU) as to whether this could be replicated for enhanced victim care within VAWG offences.

### **Regional**

5. In addition to our national work with the NPCC, the CoLP has now established itself within a regional working group alongside the Metropolitan Police Service and the British Transport Police. The aims of this group are to share best practice, combine our efforts for joint initiatives and to provide updates to the NPCC Working Group. Although chiefly aligned to VAWG, this working group will also focus on broader Trust and Confidence workstreams, thereby providing a wider benefit towards other policing related issues and organisational learning, such as race and diversity.
6. An additional relationship has been established with Avon and Somerset Police who will complete a peer review on our Internal VAWG Action Plan. This will provide greater scrutiny on our benchmarking process and provide immediate opportunities to share best practice.

### **Local**

7. Since our most recent update to members in February 2022, the CoLP has continued to develop work to tackle VAWG by delivering sustainable change, as outlined in the key milestones. Both the Strategic and Tactical leads for the Professionalism and Trust portfolio have now met with our Independent Advisory Scrutiny Group (IASG) to explore working together opportunities.
8. The following updates build upon our commitments outlined in the February 2022 report, therefore these updates reflect additional pieces of work rather than a duplication of work mentioned in previous reports.

However, the CoLP will provide VAWG Action Plan performance updates to the Police Authority Board to ensure that they have oversight of activity underway.

9. In relation to the 3 National objectives some activity on each of these to date is described in Appendix B.

## **Governance**

10. The City of London Police's strategic and tactical delivery on VAWG is being scrutinised at a national and local level, as follows:
  - The CoLP Renewing and Rebuilding Trust and Confidence Board, chaired by Assistant Commissioner Paul Betts, is driving progress against the delivery framework objectives which we have set out in our Strategic Delivery Plan under each of the three pillar objectives. To achieve this, the CoLP has a Tactical Action Plan that sets out the activities which will take place to deliver against these objectives, this Action Plan will also be sent to the HMICFRS<sup>3</sup> for independent review.
  - Achievement will be scrutinised through independent review of our performance metrics to ensure that there is objectivity and transparency. This will take the form of regular consultation with our Independent Advisory and Scrutiny Group (IASG) and more formally, through the Police Authority Board (PAB) and Professional Standards and Integrity Committee (PSIC). Key milestones and significant activity will also be highlighted to PAB/ PSIC and also shared with partners.
  - The CoLP will also regularly feed into a number of NPCC National Working Groups to share learning and best practice amongst all other Police Forces in England and Wales and the aforementioned regional Trust and Confidence Strategic Working Group with the Metropolitan Police Service and the British Transport Police.
  - We will regularly review our Strategic Delivery Plan to ensure that it includes new recommendations from the NPCC as they are announced.

## **Conclusion**

11. 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.

---

<sup>3</sup> Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) independently assesses the effectiveness and efficiency of police forces and fire & rescue services – in the public interest. [HMICFRS - Home \(justiceinspectors.gov.uk\)](https://www.justiceinspectors.gov.uk)

12. All the work noted in this report contributes to our new Policing Plan, in particular our Operational Priorities to 'Keep those who live, work, and visit the City safe and feeling safe' and to 'Put the victim at the heart of everything we do'.

### **Appendice(s)**

Appendix A- Copy of the Strategic Delivery Plan

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

Appendix C – Reframe the Night poster campaign

### **Contacts:**

#### **Rebecca Riggs**

Detective Chief Superintendent

[Rebecca.riggs@cityoflondon.police.uk](mailto:Rebecca.riggs@cityoflondon.police.uk)

#### **Carly Humphreys**

Chief Inspector

[Carly.humphreys@cityoflondon.police.uk](mailto:Carly.humphreys@cityoflondon.police.uk)

This page is intentionally left blank

# Strategic Delivery Plan for Violence Against Women and Girls (2022-2023)



## **City of London Police – Violence Against Women and Girls Strategic Delivery Plan (2022-2023)**

### **Contents**

Foreword.....	Page 3
Context.....	Page 4
Building Trust and Confidence.....	Page 6
Relentless Perpetrator Pursuit.....	Page 8
Safer Spaces.....	Page 10
Governance.....	Page 11
Next Steps.....	Page 11
Feedback.....	Page 11

## **Foreword – From the City of London Police Commissioner**

The murder of Sarah Everard by a serving police officer and other tragic deaths, such as those of Bibaa Henry and Nicole Smallman, Julia James, Gracie Spinks, Sabina Nessa and Bobbi-Anne McLeod have understandably sent shockwaves across UK policing and impacted upon the trust and confidence felt amongst the public.

We, along with all forces, have recognised the need to rebuild trust, raise standards and ensure that there is a positive, supportive, and healthy culture to demonstrate that any violence against women and girls is not acceptable, will not be tolerated and will be relentlessly challenged.

Our commitment to tackling VAWG and rebuilding trust and confidence is also fully reflected in our new Policing Plan. We have listened to our communities, our officers and staff, and have reflected this feedback into our new vision and values. A vision that sees us trusted by communities to deliver policing with professionalism, integrity and compassion.

This VAWG Strategic Delivery Plan outlines the work we will do to unremittingly tackle violence against women and girls, and to rebuild trust and confidence by ensuring we police at all times to the highest professional standards.

**Angela McLaren**

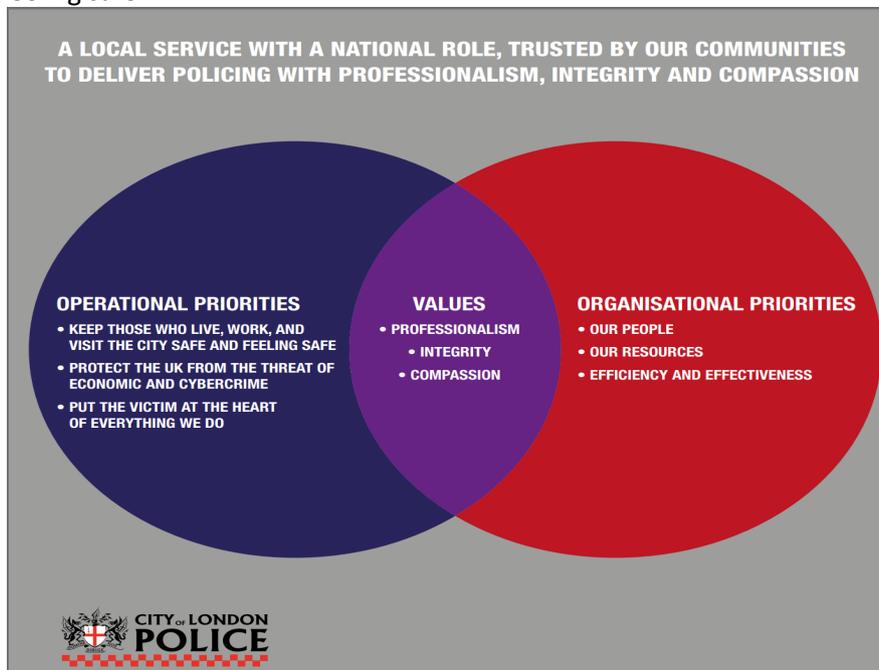


## Context

The term ‘Violence Against Women and Girls’, often referred to as VAWG, relates to acts of violence or abuse that disproportionately affect women and girls. Crimes and behaviour covered by this term include rape and other sexual offences, domestic abuse, stalking, harmful practices (including female genital mutilation and forced marriage) as well as many others. These areas include offences and behaviours committed both in person and online.

The City of London Police (CoLP) has prioritised the delivery of a new strategy, in line with the National Police Chiefs’ Council (NPCC) framework. The National framework aims to coordinate and standardise the policing of violence against women and girls. The CoLP has already made great progress in this area, however our work will continue to deliver on the framework whilst also remaining bespoke to the needs of the City. How we will achieve this is outlined in this Strategic Delivery Plan.

Our new Policing Plan (2022-2025) [Policing Plan | City of London Police](#) wholly reflects the force’s commitment to VAWG and Rebuilding Trust with our communities. The Policing Plan has our values at its core, *Professionalism, Integrity and Compassion*, these are integral to our internal priority to create a culture of inclusion and high professional standards. These will ensure that our workforce is engaged, delivers the best service possible to the public and that they are also supported to report and challenge wrongdoing. Indeed, we are clear that we need to do even more to deal with violence against women and girls, and we recognise the direct link here with rebuilding trust in police standards. Whilst externally, we will remain committed to bring together the work of our partner agencies, in particular, optimising our close working relationship with the City of London Corporation (CoLC)<sup>1</sup>, to develop and support a coordinated response to keep those who live, work and visit the city safe and feeling safe.



<sup>1</sup> The CoLC already has a VAWG Strategy in place (2019-2023) which we will remain closely aligned to and assist to support their vision that the “Square Mile is free from Violence against Women and Girls (VAWG) and is a place that is safe for everyone to live, work, learn and visit”. [City of London Violence Against Women and Girls Strategy](#)

In line with the NPCC, Year 1 of this Strategic Delivery Plan has a prime focus on areas of policing which can help us improve immediately, whilst also highlighting our integral working relationship with the CoLC, particularly around our commitment to creating Safer Spaces. Indeed, we have already delivered on a number of initiatives with the CoLC, such as the implementation of our Ask for Angela campaigns across a number of licensed premises in the City, and the establishment of Night Safety Hubs for women and girls through the 2021 Christmas and New Year period.

Moving forwards, Years 2 and 3 of our plan will focus on the wider community and partnership approaches needed to deliver sustainable change. Correspondingly, this plan will focus on the activities of the CoLP, however it will evolve in time to include, in more detail, our close work with the CoLC and wider partners.

This strategy is based upon three pillars:

**1. Building Trust and Confidence:**

This pillar focuses on our commitment to improve internal and external trust and confidence. Our Policing Plan outlines our operational priority to keep those who live, work, and visit the city safe and feel safe. Consequently, we must do more to earn the trust and confidence of our communities, in particular that of women and girls. To achieve this, we must ensure that our officers and staff uphold the highest professional standards.

**2. Relentless Perpetrator pursuit:**

This pillar focuses on our ongoing commitment to bring more perpetrators of violence against women and girls to justice, working with partner agencies as a “whole system” response. This also includes work to reduce case attrition and also to address the concerns and experiences of the victims.

**3. Creating Safer spaces:**

This pillar focuses on protecting women and girls in public spaces, at home and online. We will continue to work closely with our partners and in particular the CoLC to protect women from victimisation in these spaces.

This Strategic Delivery Plan sets out specific numbered actions under each of the pillars. These actions are individually tracked through our force’s internal ‘VAWG Tactical Action Plan’ which outlines what we have already achieved and what our future action will be to improve trust and confidence. Recognising the need to balance public concern with achievable activities, we have prioritised some actions for immediate implementation, whilst others will continue with the support of partners and community groups in the coming weeks and months.

## Building Trust and Confidence

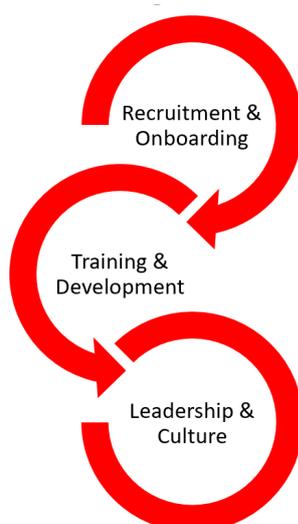
An overview of the framework for delivery for this pillar, commits the City of London Police to: -

1. Respond unequivocally to allegations of police perpetrated abuse, learning from mistakes and best practice.
2. Challenge and address sexism and misogyny within policing.
3. Involve women and girls, including those who are Black and minoritised, in scrutiny of force VAWG performance and practice.
4. Collect consistent local and national information on the availability of specialist VAWG investigators to build the right specialist capability and capacity.

The legitimacy and effectiveness of UK policing is built upon our relationship with the public, nationally this remains under strain, particularly amongst Black people and with women. Externally, we recognise that by improving all our community relationships, this will enhance our knowledge regarding any abuse or discrimination which is hidden or disguised as cultural or religious practice. Correspondingly, we will further reach out to our business, residential and visitor populations, in particularly women and girls who are black and minoritised to involve and empower them in our work to rebuild trust and confidence in policing. This not only includes our ability to gain a better insight from these communities, but also to ensure that we reflect on this in how we design our policing activities, training and processes.

Two internal forums have been hosted by the previous and current Commissioners, the feedback from our officers and staff supported our honest recognition that misogynistic attitudes and behaviours that exist in society, will also exist within policing too. In response, we remain committed to upholding the highest professional and personal standards, this is achieved through our Codes of Ethics and Standards of Professional Behaviour becoming a key priority in our strategy to improve trust and confidence, internally and externally.

Internally, the City of London Police is actively leading several initiatives to create a supportive workplace culture. Much of this work is captured within the organisations' Equality and Inclusion Strategy which can be broken down into individual workstreams, such as:



Recruiting the right people with the right skills plays a pivotal role in the growth of the organisation and further improving upon our culture. To ensure the effectiveness of these

initiatives, subsequent reporting cycles will be built into the Equality and Inclusion Strategic Board to monitor progress and delivery. This Plan also concentrates on how we create a supportive workplace culture for women who work for the City of London Police.

We have already prioritised and undertaken: -

- A series of Corporate Plan workshops to collectively explore our future values, vision and ambition.
- To continue to promote and encourage our staff to step forward and raise concerns through our well-publicised, internal and external reporting mechanisms. This will not only encourage reporting but will assist to ensure that all officers and staff understand the force's commitment to VAWG.
- A direction for our Professional Standards Department (PSD) and HR (Human Resources) to complete an urgent review of cases over the past 10 years (for significant allegations, the review period went beyond 10 years), against our officers and staff. This will ensure that those who raise concerns are being properly supported, investigations are comprehensive and sanctions in relation to violence against women and girls, reflect the seriousness of the misconduct.
- The request for a peer review of the above process by the Metropolitan Police Service (MPS) to ensure transparency, PSD will also be adopting the MPS' comprehensive review process to ensure that there is a consistent approach across London.
- A strategy to communicate immediately, clearly, and then frequently that misogynistic, sexist and sexualised behaviour will not be tolerated by anyone in policing.
- Considerable progress towards being a more inclusive organisation, of note we have launched our Equality and Inclusion Strategy "Policing the Square Mile 2020 – 2025" with a subsequent reporting cycle to monitor performance and drive progress.
- Promotion of the use of processes and mechanisms open to staff and officers to raise concerns, whether it be a grievance or bullying and harassment. In this way we seek to encourage individuals to come forward so that we can support them and deal accordingly with the concerns raised.

Despite the above, we are aware that there are groups that still do not feel they belong and there is more to do to deliver the step change in culture we want to see.

Therefore, we will: -

- Seek perspectives and reflect upon the findings of our staff surveys and focus groups to address any disparity of outcomes across protected characteristics; specifically gender and race which will help us to direct our progress on improving organisational culture.
- Reinvigorate our commitment to the Police Code of Ethics and embed this at all levels to demonstrate to our workforce that we support a culture that is inclusive, both for our staff and the people we serve.
- Commence Leadership programmes and annual values, standards and ethics workshops early in 2022. This will underline the importance of everyone being more open and alert to challenging inappropriate behaviour or actions that undermine our culture.
- Establish and continuously improve our strong 'call it out' culture (including a focus on the importance of men being upstanders not bystanders), supported by safe

processes for reporting inappropriate behaviours, and swift interventions where necessary.

- Establish a continual programme of listening circles with women from across policing, thereby seeking to involve women in designing solutions.
- Establish regular independent scrutiny of force performance in responding to VAWG which will be aligned to internally audit our activity.
- Constantly seek to expand the reach of communications, including through engagement with third sector organisations that are working closely with different groups of women and girls.
- Provide clear and evidenced examples of how this involvement is used to change and improve practice, including incorporating the voices of those with lived experiences into training and raising awareness across the organisation.

### **Relentless Perpetrator Pursuit**

An overview of the framework for delivery for this pillar, commits the City of London Police to: -

1. Relentlessly pursue and actively manage and target the most dangerous and prolific offenders.
2. Make better use of police powers to protect women and girls, and to manage and disrupt perpetrators.
3. Adopt a trauma aware approach at all levels, to better support victims through the criminal justice process and focus on evidence led prosecutions where appropriate.
4. Enhance supervision of VAWG investigations.

We are taking a whole system approach to targeting perpetrators, working across London with the CoLC, 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 we will strive to improve our detection rates for key crimes including rape, serious sexual offences, stalking and harassment. We are also working hard with the Crown Prosecution Service (CPS) to deliver the best criminal justice outcomes.

Currently, there is a lack of 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 charge and prosecution rates at a force and 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. In the meantime, we will focus our future reporting on criminal offences of a sexual and violent nature which have been perpetrated against women and girls.

We have already prioritised and undertaken:

- A review to ensure each frontline police officer has received the appropriate skills and training to use the full extent of their powers to investigate, and where an offence has occurred, bring the perpetrator to justice. Vulnerability training is now

mandatory for all frontline officers and staff, the current training package has recently been redeveloped to include a greater focus on child protection. This will be continually refreshed to ensure that officers and staff are trained to appropriately respond to a wide range of offences, including behavioural crimes which are committed against women and girls.

- Domestic Abuse processes are well established in the organisation, they include the recent introduction of a '20 Point Plan' and mandatory supervisor attendance at all Domestic Abuse incidents to enhance opportunities for evidence led prosecutions. This has been shared nationally as best practice.
- In accordance with the National Police Chief's Council (NPCC) direction, the CoLP aligns its activity to the National Vulnerability Action Plan (NVAP). This means that VAWG offences are treated as a higher priority alongside other areas of vulnerability. This is underpinned at the monthly Tactical Tasking and Coordination Group (TTCG) which ensures that there is appropriate operational delivery across all vulnerability strands, based upon threat, harm and risk.
- CoLP has secured some significant convictions and sentences for sexual offences. Such as, the sentencing of a male to 108 months imprisonment in September 2021 for rape and kidnap offences. This underlines the importance of our committed working relationship with the London RASSO (Rape and Serious Sexual Offences) CPS lead to maximise all available opportunities for prosecution.

We will: -

- Look to report on prosecution rates across a breakdown of sexual offences by requesting a disaggregation of data currently combined with that of the MPS to provide us with a detailed reporting picture.
- Intensify work with our licensed premises to reduce incidents of drink spiking, working with national best practice from many other forces who have also seen an upward trend in reporting.
- Monitor referrals to appropriate specialist victim support services, taking action to ensure these are conducted consistently and quickly.
- Ensure force well-being strategies include an awareness of the effect of trauma on police officers and staff.
- Strive to increase the number of perpetrators brought to justice for violence against women and girls.
- Actively manage known perpetrators to reduce the prevalence of violent offending against women and girls by using a wide range of tactics. With the added aim that this will improve the level of trust and confidence which our City residents, workers and visitors have in how we respond to all forms of violence against women and girls.
- Improve training to frontline officers on Stalking and Harassment to ensure that all communities, including workers feel safe in the City.
- Improve processes and victim care across the criminal justice system to improve outcomes.
- Work to reduce the likelihood of women and girls becoming repeat victims.
- Increase women's confidence in the police, and in doing so, improve the reporting of crimes which disproportionately affect women and girls in London. To achieve this, training for officers and staff of all ranks will need to ensure that the importance of VAWG and the severity of its impact is widely discussed and understood.
- Intensify work to tackle sexual misconduct and domestic violence by officers and staff.

## Safer Spaces

An overview of the framework for delivery for this pillar, commits the City of London Police to: -

1. Immediate and unequivocal prioritisation of VAWG.
2. Focus prevention work on the most dangerous online, private, and public spaces.

We are working alongside the CoLC and other partners to create safer spaces, so that women and girls both are safe and feel safe. We will achieve this by increasing our understanding of hotspot locations where women and girls feel unsafe, correspondingly we will work with the CoLC and partners to design-in safety, whether this is in public spaces, at home or online.

We recognise the need for greater comprehension regarding the data and evidence in relation to the challenges presented by VAWG. Consequently, we are working to improve the detail around our current force intelligence picture, in addition to how this compares across the national landscape.

We have already: -

- Commissioned and resourced the creation of an intelligence profile, considering all information available over a 3-year period to identify where violent criminality tends to occur.
- Completed Hot Spot data analysis over a 3-year period to identify where violent criminality tends to occur.
- We have increased our visibility by patrolling public spaces and night-time economy venues to ensure people are safe and feel safe.
- Included an officer from Public Protection within the previously held Night Safety Hubs to provide specialist support to any female reporting a concern.
- Launched a project with CoLC to re-introduce Police Boxes into the Square, to provide a network of physical safe havens and emergency contact points.
- Successfully refreshed the 'Ask for Angela' campaign to raise awareness regarding how all employees at hospitality venues, can help tackle behaviours which make women and girls feel unsafe and provide them with immediate support.
- Piloted a new online tool called StreetSafe (launched by the Home Office and National Police Chief's Council) which enables the public, particularly women and girls, to pinpoint an area within the city where they feel unsafe and asks them to explain why. Thereby enabling us to identify how we can work with partners to make these areas safer.

In addition to the above we will: -

- Build VAWG into our priority plan, and into internal and external policies and processes, ensuring appropriate equality impact assessments are conducted and in place.
- Embed the new Serious Violence Duty into partnership VAWG plans.
- Develop and implement a communications and engagement strategy to set out how this prioritisation will affect police behaviours and practice, and how it will be monitored.

- Use profiles to target prevention activity, inform offender management, and increase the understanding and needs of our most vulnerable victims.

## **Governance**

The CoLP Renewing and Rebuilding Trust and Confidence Board, chaired by Assistant Commissioner Paul Betts, will drive progress against the delivery framework objectives which we have set out in this plan under each of the pillars. To achieve this, the CoLP has a Tactical Action Plan that sets out the activities which will take place to deliver against these objectives, this Action Plan will also be sent to the HMICFRS<sup>2</sup> for independent review.

Achievement will be scrutinised through independent review of our performance metrics to ensure that there is objectivity and transparency. This will take the form of regular consultation with our Independent Advisory and Scrutiny Group (IASG) and more formally, through the CoLC Police Authority Board (PAB). Key milestones and significant activity will also be highlighted to PAB and also shared with partners.

The CoLP will also regularly feed into a number of NPCC National Working Groups to share learning and best practice amongst all other Police Forces in England and Wales. Similarly, the CoLP is also engaged in a regional Trust and Confidence Strategic Working Group with the Metropolitan Police and the British Transport Police.

We will regularly review our Strategic Delivery Plan to ensure that it implements new recommendations from the NPCC as they are announced.

## **Next Steps**

Using a Nationally agreed performance framework, we will report against the progress of our crucial work to rebuild trust internally and externally. We will document this through our quarterly business plan updates which are published, as well as through a range of other mediums to enable independent oversight and scrutiny.

## **Feedback**

*We value the views of our communities and partners on this plan, you can provide feedback online at [VAWGFeedbackPublic@cityoflondon.police.uk](mailto:VAWGFeedbackPublic@cityoflondon.police.uk). We want to hear views on the plan as well as any ideas regarding what else you would like to see the City of London Police doing in relation to Violence Against Women and Girls.*

---

<sup>2</sup> Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) independently assesses the effectiveness and efficiency of police forces and fire & rescue services – in the public interest. [HMICFRS - Home \(justiceinspectors.gov.uk\)](http://justiceinspectors.gov.uk)

This page is intentionally left blank

## Appendix B- VAWG Update to May SPPC, PSIC and PAB

### Highlights of progress against NPCC objectives

#### NPCC Objective 1-Improve Trust and Confidence in Policing

This area focuses on our commitment to improve internal and external trust and confidence. Our new Policing Plan outlines our operational priority to keep those who live, work, and visit the City safe and feel safe. Consequently, we know that we must do more to earn the trust and confidence of our communities, in particular that of women and girls. To achieve this, we must ensure that our officers and staff uphold the highest professional standards.

#### Highlights:

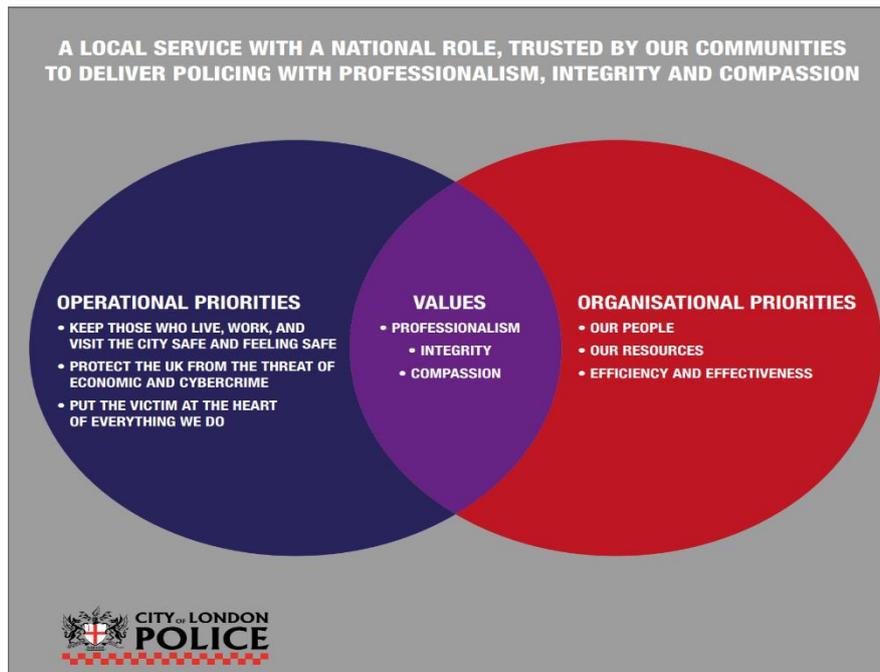
- Our Professional Standards Department (PSD) continue to review live, recent and historical cases to ensure that all concerns raised have been dealt with appropriately and updates on this are being provided to the Professional Standards and Integrity Committee. A peer review of cases with the Metropolitan Police will continue, not only to ensure absolute objectivity, but also to ensure that any organisational learning from each force is recorded and promulgated.

The PSD Counter Corruption Unit (CCU) has reported that the majority of concerns raised to them have been through direct contact rather than by anonymous reporting, this could indicate that employees are gaining confidence in the process of raising concerns.

- A number of PSD inputs regarding VAWG will be delivered by the dedicated Engagement Officer. This activity is designed to capture as many employees as possible through Management courses, probationer and transferee inductions and more general departmental inputs. A particular focus for these inputs is the organisation's Social Media Policy and will also refer to recent national misconduct cases.
- The PSD has reviewed the recommendations of the Operation Hotton Report<sup>1</sup> and responded with an overall strategic response regarding how these recommendations will be adopted for CoLP. This strategy has been circulated to our internal Rebuilding Trust and Confidence Strategic Board for comment and an update on this will be provided to the Professional Standards and Integrity Committee. The PSD will continue to review national organisational learning and promulgate recommendations which are appropriate for CoLP.
- Our new [Policing Plan | City of London Police](#) (2022-2025) intentionally puts victims at its heart and has a strong focus on creating a culture of equity and belonging.

---

<sup>1</sup> [Operation Hotton Learning report - January 2022.pdf \(policeconduct.gov.uk\)](#) – the report makes 15 recommendations for the MPS to change policing practice following an IOPC investigation which found evidence of discrimination, misogyny, harassment and bullying involving officers predominantly based at Charing Cross Police Station.



This plan has now been published internally and externally. Furthermore, our own comprehensive internal communications strategy will ensure that all of our workforce understand what the priorities and values mean to them.

- On the 11<sup>th</sup> March 2022, Commissioner Angela McLaren opened the Force’s first ‘Our People’ conference which welcomed around 150 Police Officers and Staff at managerial level from across the organisation. The Force’s new values were introduced (‘Compassion’ has now joined ‘Integrity’ and ‘Professionalism’) with an emphasis on compassion, which applies not only to how we interact with the people we serve, but also in how we treat one another within the organisation. A number of important areas around Equality and Inclusion were the focus of the day, in particular VAWG, Race and Ethnicity, with a focus on leaders reflecting on their personal responsibility to make CoLP a more inclusive organisation. Feedback from the event is that this was hugely successful and impactful.

## **NPCC Objective 2- Relentlessly Pursue Perpetrators**

This area focuses on our ongoing commitment to bring more perpetrators of violence against women and girls to justice, working with partner agencies as a “whole system” response. This also includes work to reduce case attrition and to address the concerns and experiences of the victims.

- Public Protection are undertaking a capability review to ensure that the CoLP’s operational response meets the public calls for service regarding VAWG. This piece of work not only seeks to examine specialist 24/7 availability but also wider training requirements for the whole workforce.
- To ensure that the highest investigative standards are maintained within VAWG investigations, there is now a process for a monthly dip-check of investigations

completed by the Crime Scrutiny Board and an independent Detective Chief Inspector from the Professionalism and Trust department. This also enables any organisational and individual learning to be captured and remedies implemented at the earliest opportunities.

- Public Protection are completing a review on offender management processes, in particular regarding managing offenders' post-conviction who are subject to civil orders, such as Domestic Violence Protection Orders and Stalking Protection Orders. This will support the Government's new Tackling Domestic Abuse Plan<sup>2</sup> and outline our approach in tackling domestic abuse through prioritising prevention, supporting victims, pursuing perpetrators and working with the CPS to build a stronger system.

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

This area focuses on protecting women and girls in public spaces, at home and online. We will continue to work closely with our partners and in particular the City of London Corporation (CoLC) to protect women from victimisation in these spaces.

#### Highlights:

- Following on from the Home Office funding award to raise awareness regarding the 'Street Safe' application<sup>3</sup>, the renewed advertisement campaigns have now gone live. The next stage of this campaign will be to review the data collected over the coming months, and whilst working with the CoLC, identify what improvements can be made to increase feelings of safety in the City.
- The funding also received for the 'Reframe the Night' campaign<sup>4</sup> (please see graphics in Appendix C) has provided the opportunity for joint advertisement with the CoLC around the City. So far, the campaigns on social media and within City of London train stations, have resulted in 9.3 million adult impressions through JCDecaux signage. The campaigns remain live, and Members will be updated in the September report.
- The Home Office funding received to enhance the 'Ask for Angela' campaign, through provision of Welfare And Vulnerability Engagement (WAVE) training to 100 licensed venues across the City remains underway. This will continue to ensure that trained staff at those venues are able to prevent and respond to incidents of VAWG.

---

<sup>2</sup> [Tackling Domestic Abuse Plan - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

<sup>3</sup> This is a website ([StreetSafe | City of London Police](#)) which encourages 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 Corporation to address the issues raised.

<sup>4</sup> This is an awareness campaign largely delivered to the public in the City to challenge myths and misconceptions around sexual harassment. The emphasis will be on men to think about changing their behaviour, rather than putting the responsibility on women to change their behaviour to keep themselves safe. Please note that in the previous report this was entitled 'Good Night Out', however the terminology has now changed.

- CoLP continue to work alongside Victim Support to deliver Safety in the City presentations to around 600 employees from businesses such as UBS, Lloyds of London, Broadgate security, 22 Bishopsgate and Savills. The sessions highlighted the City of London's response to VAWG, including information on what men can do and how they can change their behaviour to help make women feel safer. Reframe the Night and Street Safe are both promoted during these presentations. The businesses provided positive feedback and requested further sessions.
- The CoLP launch of 'Op Reframe' is on the 28<sup>th</sup> April 2022 and will host a partnership safety hub for women and girls near to Liverpool Street Station on a monthly basis. Looking further ahead<sup>5</sup>, the CoLP has commissioned the development of mobile digital 'police boxes' and will in the longer term provide mobile 'safe havens' which can be used in particular by women and girls during night time economy peak hours.

---

<sup>5</sup> Estimated implementation date is 2024.

**“ If they go  
out dressed  
like that,  
what do  
they  
expect? ”**

**Whatever we  
choose to wear,  
we deserve  
and expect  
your respect.**

*Let's make these attitudes a thing of the past.*

[cityoflondon.gov.uk/reframethenight](http://cityoflondon.gov.uk/reframethenight)



FOR SAFER  
NIGHTLIFE



CITY  
OF  
LONDON



**“ He can’t help it, he’s always a bit handsy when he’s had a few ”**

**If you can have a drink without assaulting anyone, so can he.**

*Let’s make these attitudes a thing of the past.*

[cityoflondon.gov.uk/reframethenight](http://cityoflondon.gov.uk/reframethenight)

**“ We used to have fun at work, but you can’t say anything these days ”**

**Fun for who? If people are your punchlines, it’s time to change the script.**

*Let’s make these attitudes a thing of the past.*

[cityoflondon.gov.uk/reframethenight](http://cityoflondon.gov.uk/reframethenight)



FOR SAFER NIGHTLIFE



CITY OF LONDON



**“It’s none  
of my  
business,  
she’s  
probably  
fine”**

**If you see  
someone being  
harassed,  
check in and  
show you care.**

*Let’s make these attitudes a thing of the past.*

[cityoflondon.gov.uk/reframethenight](http://cityoflondon.gov.uk/reframethenight)



FOR SAFER  
NIGHTLIFE



CITY  
OF  
LONDON



**“ I heard  
she made it  
all up for  
attention ”**

**Many don't  
speak up about  
sexual violence  
from fear of not  
being believed.  
Are you safe to  
share with?**

*Let's make these attitudes a thing of the past.*

[cityoflondon.gov.uk/reframethenight](http://cityoflondon.gov.uk/reframethenight)



FOR SAFER NIGHTLIFE



CITY OF LONDON



This page is intentionally left blank

# Agenda Item 9

<b>Committee(s):</b> Professional Standards and Integrity Committee  Police Authority Board	<b>Dated:</b> 25 May 2022  30 June 2022
<b>Subject:</b> Quarterly Equality and Inclusion Update	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1 and 3
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N/A</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	<b>N/A</b>
<b>Report of:</b> Commissioner of Police Pol 33-22	<b>For Information</b>
<b>Report author:</b> DCS Rebecca Riggs, CI Carly Humphreys, Professionalism and Trust; Kam Dhaliwal, Equality & Inclusion Manager	

## Summary

Members will recall the Equality and Inclusion (E&I) Strategy and Plan, originally submitted to the November 2021 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 February 2022.

As presented in February 2022, 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 of activity in the last reporting period on the various workstreams and includes the success measures or Key Performance Indicators (KPIs) for Equality and Inclusion, for Members' information. The Force is currently considering how these will be presented for internal governance ahead of them being presented to Members for scrutiny.

In discussion with the Police Authority Director / Team and in line with the revised Terms of Reference, this Committee will now oversee the Diversity Workforce Data and this is included at Appendix B.

In terms of an annual review of E&I activity, this is being provided as part of the formal City of London Police Annual Report 21-22 submitted to the Police Authority Board.

## Recommendation(s)

It is recommended that Members note the report.

## **Main Report**

### **Background**

1. At a 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 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 the last Committee in February 2022, Commissioner McLaren has appointed a Chief Superintendent to lead a new Professionalism and Trust Portfolio. The Commissioner will remain the strategic lead for the E&I programme and the new Chief Superintendent responsible for Professionalism and Trust, will lead the delivery at a tactical level. Due to the change in leadership and portfolios, the Force will be reviewing a number of its diversity boards and processes.
4. The Commissioner has reviewed the draft report following the internal Black and Minority staff survey and has tasked the new Professionalism Portfolio lead, to develop a new Race Action Plan by establishing a working group that represents the diversity of the force and specialist advisors. The Professionalism and Trust Team has reviewed a number of government race reports and staff surveys to help inform the new action plan.
5. Additionally, at the February Police Authority Board the Commissioner referenced the Police Federation Survey of which the results had recently been circulated to Forces. The Chief Officer Team is due to meet with the Chair of the Police Federation to discuss the outcomes from the survey with a view to taking any action required. It is also anticipated that the National Police Chiefs Council (NPCC) will be developing a new Race Action Plan and once received this will be consolidated into existing work in Professionalism and Trust.
6. Highlights of work since the February update include:

## Recruitment and onboarding

- a. On 14 January, the Force commenced its recruitment and outreach campaign, for the year 3 uplift to increase our headcount by 100 officers, via 4 different entry routes, with intakes for courses starting in August. A dedicated uplift team has been established to achieve this including recruitment across Human Resources, Comms Learning and Development, Vetting and Occupational Health to support the increase in numbers. They are using targeted advertising at universities as well as social media and home office publications to push their campaigns to the furthest reach. The emphasis of the campaign is to attract diverse candidates and to build the brand of the Force, to become an 'employer of choice'. Alongside the probationers, the Force has also launched its transferee campaign in a bid to attract experienced officers into the Force before the end of this financial year.
- b. The Force recruited a dedicated Positive Action Team of 1 Sergeant and 2 Police Constables to co-ordinate and deliver the outreach campaign. This includes community events in high diversity areas, graduate and recruitment fayres as well as online webinars. Please see Appendix C, which contains a copy of the current recruitment advert.
- c. The Force has recruited 15 force ambassadors known as "buddy's" from serving staff and officers who support candidates through the recruitment process. They will provide specific support to female and Black and Minority candidates to ensure they are doing everything they can to support these candidates through the process. The force will continue to report to the Police Authority Board in respect of the progress of the recruitment campaign over the coming months.

## Training and development

- d. The Force's Learning & Organisational Development (L&OD) Team is designing a new mandatory training programme for all staff and Officers, which advocates a modular approach to Equity and Belonging training. It utilises a new blended learning approach where staff will be able to choose activities and events from a menu of options, according to their own areas of interest and preferred learning style. Engagement is ongoing with staff networks to inform the content and rollout. This will be launched late summer 2022 with an introduction at each 'launch' session from the Chief Officer Team. Mentivity<sup>1</sup> will be one of the options, alongside community engagement projects, targeted learning through a theatre company delivery, online inspirational speakers and face-to-face coffee mornings with under-represented groups.
- e. Alongside this, the L&OD Team continue to deliver 1-2 hour 'Focus on' sessions, accessible to all staff and officers, via Microsoft Teams. The April 2022 programme focuses on Neurodiversity and Mental Health, adding this to the range of topics already covered which include Unconscious Bias, Gender and Equity, LGBT+, Gypsy/Roma/Traveller, Living with HIV and Disability.

---

<sup>1</sup> Mentivity- Mentivity seeks to deliver bespoke mentoring for each group and individual based on the identified need displayed by mentees.

- f. Following the success of PALs (Positive Action Leadership Scheme) for Black and Minority colleagues launched last year, a second programme will be running with a launch date in May 2022. An engagement and awareness event took place on 28 February 2022 with the PALs champion, the Assistant Commissioner for Economic Crime and PALS Alumni, where Organisational Developmental members were also in attendance.

## **Leadership and Culture**

- g. The Force held its first cross-force E&I conference on 11<sup>th</sup> March 2022 for managers, framed under the title *Our People*. This event was supported by a promotional video created by the Force which demonstrated the value of our diverse workforce.
- h. A framework for internal E&I awareness inputs has been jointly developed between the Head of L&OD and the strand lead for Leadership and Culture. The approach will be considered by the force's Chief Officer Team (COT) prior to roll-out in Q3 2022.
- i. The Force held its first Code of Ethics Working Group in March 2022, coordinated by the Force's new ethics champion (Deputy Director, Professional Standards Directorate (PSD)). A fuller update on this is also on the PSIC agenda.
- j. The force's data bias working group has met a number of times to identify areas where conscious or unconscious bias can potentially impact on the use of information and intelligence. These themes will be monitored and actioned by relevant departments / oversight groups.

## **Community Engagement**

- k. The 'Schools Project' led by the force, City of London Corporation (CoLC) and Amazon Web Services (AWS) Schools Project has concluded, it was considered a success (further projects likely to follow). Workshops introduced young people to the different types of digital careers available to them across policing and local government, in total 43 students took part across 5 schools. The Force workshop was delivered online, and students given advice on how to obtain support, and report cyber bullying concerns to the police. Further, students were told about the different routes into policing, with some later expressing an interest to join at the end of the programme.
- l. Project Outreach – Recruitment outreach events have targeted high footfall, diverse areas both inside and [mainly] outside of the City. This has led to a significant increase in applications (over 500), with many having completed their day-2 recruitment assessments already. There has also been a focus towards outreach events at Universities (those offering degrees in Policing and Criminology) – these were a mixture of in-person events and online sessions. As of 6 April 2022, across 41 different outreach events/engagements, a total of 1867 recruitment cards have been disseminated (inc. QR code – link to application), and 622 face-to-face interactions (officers demystifying recruitment prerequisites/process). Again, this has led to excellent feedback and an uptake

in force applications. Finally, there remains sustained efforts at networking events and religious institutions to improve the diversity of applicants.

- m. Dedicated Ward Officers (DWOs) continue to engage regularly with Afghan refugees being accommodated in the City. Considerable multi-agency and partnership working is still taking place, with the Force providing support during the ongoing programme of 'Orientation Sessions' which aim to provide assistance with adapting to life in the UK. Weekend sports activities were also arranged by Tactical Firearms Group (TFG) with support from Sector Policing for children over a number of weeks.
- n. Following their launch last year, the latest Sector Cluster Panels took place on 4 and 16 May 2022 updates on these are given in the Community Engagement Update to the Police Authority Board. The first round was well attended by both business and residential communities, including Elected Members, and highlighted a number of themes that local policing will seek to address. In total there have been 6 Panels held (1 for each Cluster), and whilst individual issues/concerns/sentiments were raised in each (i.e., drug use, homelessness) a common agenda was set for all, including Sector Policing updates (local activity, events, engagement opportunities), a crime data presentation (emerging trends, hotspots), and a question/answer session. Membership tends to be broad, with business representatives, residents and Elected Members attending. For the next set of Panel meetings, there will be a comprehensive communications plan with the support of Corporate Communications; this will include (where practicable) social media awareness raising (i.e., future meetings, summary of discussions), and the publication of locally agreed priorities.
- o. Plans are underway to develop a Night Time Economy (NTE) operation; the overall intention, to reduce the level of crime and disorder in the area and provide a safer environment for residents and genuine visitors, who come to enjoy the Night Time Economy. The plan will consider how best we proactively engage with City stakeholders and take every opportunity to communicate and build a good rapport with the public. The plan will seek to build upon a number of workstreams including; Reframe the Night, which is a joint operation with CoLC and Safer Business Network to deliver engagement activities for NTE Safety, primarily focused on the safety of women and girls, but added focus on men, looking at their own behaviours and actions; Street Safe, an online platform to report any concerns around personal safety within public spaces – linked to the NTE; Ask for Angela, which seeks to develop the skills, knowledge, and confidence of those working in licensed premises focusing on identifying vulnerability and making appropriate interventions. This is outlined in more detail in the report on Violence Against Women and Girls on the agenda.
- p. The Force Volunteer Cadet Unit continues to be recognised for its involvement in local events, supporting policing operations and work with blue-light partners. As a snapshot, in the last 12 months, Cadets have attended a number of events/policing activities including, but not limited to; the Lord Mayor's Show, Remembrance Sunday, Custody community project, Project Servator deployments, and weapons sweeps. The recruitment aim continues to be 50 active Police Cadets, with the overarching ethos to create a culture of inclusion,

seeking to retain a diverse talent pool of Cadets. There are currently 29 active Force Cadets, 12 male and 17 female. 5 are due to leave this year (due to age), and at least 1 Cadet has expressed an interest to join the Force as a probationer constable. There is 48% Black and Minority representation, and broad diversity in terms of culture and religion. Recruitment is an ongoing process.

- q. Work continues with the Independent Advisory Scrutiny Group (IASG) in undertaking scrutiny of the Force in such areas as stop and search and use of force. Additionally, the Force are currently recruiting to establish a youth independent advisory and scrutiny group, which will both complement the existing work, but will also add scrutiny and thinking from a different perspective.

## **Health & Wellbeing**

- r. Since the commencement of the Commitment to improving Mental Health (MH) in the workplace, the Force has commenced the MIND improvement Action Plan. To start the journey, they opened the conversation and dialogue to improving MH within the workplace. Senior level, Single Point Of Contacts (SPOC) have been appointed and have formed a working group, which is chaired by the Health and Wellbeing Strategic lead, who is ensuring there is a high-level commitment to the project. The highlights of the MH journey within the Force have been published in a blog on the MIND website. The Wellbeing Zone launched in December has been well received and is used to the benefit of the staff within the Force.
- s. The Oscar Kilo<sup>2</sup> peer review is due to commence in April 2022. The Force has been paired with Nottingham Police Service to complete reciprocal reviews. This will allow continued development and improvement in the Force and will dovetail with the MIND improvement plan which follows similar principles for a “whole force” approach.

## **Retention and Exiting the organisation**

- t. A working group has been set up to progress the objectives and actions from the EDI Action Plan. The strand lead has engaged with Human Resources, the Equality Manager and staff representatives, to understand the Force’s current process, existence of any gaps, and benchmarking against other organisations and making the process accessible for all. Additionally, the Chief Superintendents and the Chief Officer Team are conducting retention interviews for those intending to leave the organisation.
- u. The working group has had its first meeting and has established a few gaps in the process that can be resolved easily. The working group has gained an understanding of why employees may not choose to complete the exit surveys and remedies have been sought. Various different exit processes from different organisations have also been sourced for comparison, which will be considered at the next meeting. An internal exit interview process is being considered to help understand the culture within business units and how the equality data should be captured. The strand lead for this area will continue to provide an update to the board.

---

<sup>2</sup> [Oscar Kilo](#) | [Oscar Kilo](#)- The National Police Wellbeing Service

## Impact

- v. The Force has undertaken a review of how it measures progress and success against their E&I strategy and has compiled the following list of KPI measures which were presented to this Committee in February. These are aligned to the new Policing Plan 22-25. The Force is currently considering how these will be presented for internal governance ahead of them being presented to Members for scrutiny.

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	<ol style="list-style-type: none"> <li>1. Community confidence &amp; satisfaction measures through surveying victims of crime &amp; the wider community</li> <li>2. Sampling of stop &amp; search &amp; use of force incidents by our independent Advisory Scrutiny Group % graded as good &amp; excellent v those requiring improvement</li> <li>3. Number &amp; breadth of community events attended each month and proactive communications out to communities</li> </ol>
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.	<ol style="list-style-type: none"> <li>1. To recruit 40% of visible ethnic minority student officers in each new intake</li> <li>2. Per year we improve our representation of visible ethnic minority employees by 3.23%</li> <li>3. Increasing number of employees from a black minority background successful at promotion processes</li> <li>4. The total number of new joiners to The Force each year is at least 51% female to achieve an overall increase of 2.6% per year of female representation across the service</li> <li>5. Per year to improve 0.35% employees from a LGBT background</li> </ol>
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 the force is an employer of choice.	<ol style="list-style-type: none"> <li>1. Our staff engagement score through surveying over the next 3 years increases Scores specifically relating to feelings of inclusion, leadership &amp; culture related responses</li> <li>2. 100% of eligible workforce having attended annual values, standards &amp; ethics inputs by 03/23</li> <li>3. No of staff members engaged in external attachments &amp; CPD events/ support to voluntary organisations (+ direction of travel)</li> </ol>
Wellbeing	Taking a proactive and preventative approach to workforce wellbeing, as well as intervening at the earliest opportunity to help protect our people & increase productivity	<ol style="list-style-type: none"> <li>1. Specific staff survey questions in relation to feelings of well-being to improve over the 3 years.</li> <li>2. Op Hampshire 75% outcome rate for assaults and hate crime committed towards staff.</li> </ol>
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.	<ol style="list-style-type: none"> <li>1. Line managers to offer an exit interview to all those intending to leave – Target of 100%</li> <li>2. The % exit interviews completed officers and staff</li> <li>3. Retention rates over the next 3 years (excluding retirements, transferees &amp; ill health) are improved against the 2021 baseline</li> <li>4. % of leavers that are contacted by the force within 12 months in respect of opportunities to re-join</li> <li>5. <b>Retention – Black, Asian and Minority staff</b> Black, Asian &amp; 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)</li> <li>6. <b>Retention female staff - female</b> attrition rates for voluntary leavers are equal to or better than the rates for male leavers (xx% baseline)</li> </ol>

## **Diversity Workforce Data**

7. In discussion with the Police Authority Director and Team and in line with the revised Terms of Reference for this Committee, the Diversity Workforce data will now be presented to this Committee for oversight and scrutiny and is attached at Appendix B.

## **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- Diversity Workforce Data
- Appendix C – Recruitment campaign poster.

**Contact:**

**Rebecca Riggs**

**Detective Chief Supt**

Professionalism Portfolio

City of London Police

[Rebecca.riggs@cityoflondon.police.uk](mailto:Rebecca.riggs@cityoflondon.police.uk)

**Carly Humphreys**

**Chief Inspector**

Professionalism Portfolio

City of London Police

[Carly.Humphreys@cityoflondon.police.uk](mailto:Carly.Humphreys@cityoflondon.police.uk)

**Kam Dhaliwal**

**Equality & Inclusion Manager**

Professionalism Team

City of London Police

[Kamalpreet.dhaliwal@cityoflondon.police.uk](mailto:Kamalpreet.dhaliwal@cityoflondon.police.uk)

This page is intentionally left blank

<b>Workstream</b>	<b>Health and Wellbeing</b>	<b>Owner</b>	<b>Chief Supt Steve Heatley (Local Policing)</b>	<b>Date</b>	<b>01/04/22</b>	<b>Project RAG</b>		<b>Benefit RAG</b>	
-------------------	-----------------------------	--------------	--	-------------	-----------------	--------------------	--	--------------------	--

<b>Workstream objectives</b>	<b>Priority Deliverables</b>	
	Description	Date
<ul style="list-style-type: none"> <li>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. <b>11/21 this now occurs upon the induction course from L&amp;OD</b></li> <li>Develop a local plan that incorporates Health and Safety, Wellbeing and Fulfilment <b>09/21 Wellbeing strategy written and launch reviewed annually – Reviewed re published Jan 22</b></li> <li>Ensure CoLP leaders are equipped to deal with Mental Health difficulties <b>11/21 but ongoing L&amp;OD include this within the various leadership courses that are run.</b></li> <li>Implement wellbeing initiatives to improve peoples quality of life whilst at work <b>09/21 this is an ongoing piece with monthly calendar set up to update teams of the activities</b></li> <li>Focus on staffs mental health and embed supportive and preventative policies and initiatives <b>01/22 This work is ongoing MIND sign up through NPCC 6 pledges</b></li> <li>Review current HR policies to ensure the maximum support is given to all staff with protected characteristics- <b>06/22 This work is ongoing</b></li> <li>Ensure teams supporting our Occ Health are trained in issues around inclusion and diversity- - <b>09/21 Complete and Ongoing as they are a separate unit they do receive training from their providers with diversity sand inclusion.</b></li> </ul>	Launch a Buddy Scheme for all new joiners (completed) on going all new students receive the buddy scheme including Police Now candidates.	ongoing
	Review strategy on Health and Wellbeing (completed and published)	02/22
	Oskar Kilo recommendations and planning	06/22
	60 MH first aiders to be trained and launched	06/22
	Launch Wellness Zone in Bishopsgate (COMPLETE)	11/21
	MH at work commitment MIND CHARITY	06/22

Page 12

<b>Progress since last update</b>	<b>Key next steps</b>
<ul style="list-style-type: none"> <li>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.</li> <li>Article Blog published within the MIND MH web site – this forms part of the NPCC strategy</li> <li>Working group with Senior leaders as SPOCS from the various Directorates have been nominated to form a working group to look at ways to improve the MH activity within the FAORCE.</li> <li>MH MIND action plan commenced and updated – looking at the areas of improvement.</li> <li>SPOC /Lead identified for PISP (post incident support programme) Looking at ways to drive this through the CoLP.</li> <li>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.</li> <li>Coffee MH wellbeing morning completed this is a bi monthly activity.</li> </ul>	<ul style="list-style-type: none"> <li>Still awaiting 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.</li> <li>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.</li> <li>Funding for better conversations with Sarmatians has been submitted, this will allow up to 240 extra staff (pilot) initially to be trained in better listening techniques to begin the MH conversations within the work place, this forms part of the action plan for the 6 commitments to MH in the workplace. Upon feedback this will be rolled out across the force.</li> </ul>

<b>Recommendations to Operational Delivery Board</b>	<b>Decisions required by Operational Delivery Board</b>
None at this stage	None

Workstream	Retention and Exiting	Owner	T/DCS Bradford (ECD)	Date	07/04/22	Project RAG		Benefit RAG															
<b>Workstream objectives</b>				<b>Priority Deliverables</b>																			
<p>The workstream objectives have been re-ordered according to the chronology of the “leaving process” and aligned to the references in the wider plan.</p> <ul style="list-style-type: none"> <li>Undertake a review of what roles within the organisation could most benefit from <b>greater flexibility</b> in staff entering and exiting (#48)</li> <li>Ensure <b>policies and procedures</b> are in place to identify why staff with protected characteristics leave the service (#7)</li> <li>Undertake a <b>review of process</b> for exit from service procedures (#44)</li> <li>Undertake a <b>full review of retention/leaving data</b> (#22)</li> <li>Widely <b>readvertise re-joining</b> options (#47)</li> <li>Utilise positive action principles to <b>proactively contact</b> Black and Minority officers and staff within two years of them exiting the organisation to encourage them to return (#38)</li> <li>Consider <b>national policies</b> to allow exit and re-entry into the organisation (#45)</li> </ul> <ul style="list-style-type: none"> <li><b>KPI objectives are required</b> for the two stages –</li> <li><b>Stage 1</b> is before the person has actually left the organisation</li> <li><b>Stage 2</b> is after the person has left the organisation.</li> </ul>				<table border="1"> <thead> <tr> <th>Description</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Agree a new process map for our exiting employee journey</td> <td>01/06/22</td> </tr> <tr> <td>Set retention and exiting KPIs for line managers and targets across our protected characteristics</td> <td>01/08/22</td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>						Description	Date	Agree a new process map for our exiting employee journey	01/06/22	Set retention and exiting KPIs for line managers and targets across our protected characteristics	01/08/22								
				Description	Date																		
				Agree a new process map for our exiting employee journey	01/06/22																		
				Set retention and exiting KPIs for line managers and targets across our protected characteristics	01/08/22																		
<b>Progress since last update</b>				<b>Key next steps</b>																			
<ul style="list-style-type: none"> <li>High-level strategic ambitions and a plan-on-a-page have been created for this workstream.</li> <li>The workstream objectives have been re-ordered according to the chronology of the “leaving process” and aligned to the references in the wider plan.</li> <li>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.</li> <li>A working group has been set up to progress the objectives and actions from the EDI Action Plan. The strand lead has engaged with Human Resources, the Equality Manager and staff representatives, to understand the forces current process, any gaps, benchmarking against other organisations and making the process accessible for all.</li> <li>The working group has had its first meeting and has established a few gaps in the process that can be resolved easily. The working group has gained an understanding of why employees may not chose to complete the exit surveys and remedies have been sought. Various different exit processes from different organisations have also been sourced for comparison, which will be considered at the next meeting. An internal exit interview process is being considered to help understand the culture within business units and how the equality data should be captured.</li> </ul>				<ul style="list-style-type: none"> <li>Draft KPI’s for stage 1 and stage 2 have been created and require workshopping to ensure appropriate consultation has taken place.</li> <li>An HR SPOC has been identified to assist with data requirements from across the force.</li> <li>Research with “other” forces is underway to seek existing good practice.</li> <li>An interim process for recontacting recent leavers (#38) is being considered.</li> </ul>																			
<b>Recommendations to Operational Delivery Board</b>				<b>Decisions required by Operational Delivery Board</b>																			
None at this stage				None																			

Workstream	Leadership & Culture	Owner	DCS Oliver Shaw (AF/NFIB)	Date	05/04/22	Project RAG		Benefit RAG	TBD	
<b>Workstream objectives</b>				<b>Priority Deliverables</b>						
<ul style="list-style-type: none"> <li>Leaders to ensure they create an inclusive culture within the organisation</li> <li>Create a culture where people feel confident to share their protected characteristics</li> <li>Encourage leaders to continuously improve their approach to inclusivity and ensure learning is regular and ongoing</li> <li>Develop a framework of champions and senior leaders to drive forward CoLP's E&amp;I agenda and work with internal and external partners to promote activity</li> <li>Recognise and reward good work and bravery across E&amp;I</li> <li>Undertake annual workforce surveys</li> <li>Further develop consultation and feedback mechanisms that enable all staff to take part in broad organisational decision making</li> <li>Scope partnership and secondment opportunities outside the organisation to enhance and build new skills in leaders</li> </ul>				<b>Key Deliverable / Key Performance Indicator</b>						<b>Target Date</b>
				Launch mandatory Values, Standards and Ethics sessions						Q3/22
				KPI: 100% of eligible staff have attended one of the mandatory inputs						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 (complete)						01/22
				Complete a data bias review and recommendations						06/22
				Introduce an annual E&I award as part of future event						07/22
				Further develop Diversity Allies Scheme						Q3 2022
<b>Progress since last update</b>				<b>Key next steps</b>						
<ul style="list-style-type: none"> <li>CoLP has completed the production of an E&amp;I promotional video</li> <li>CoLP has held its first E&amp;I conference (11/03/22), framed under the title <i>Our People</i></li> <li>A framework for internal E&amp;I staff awareness inputs has been developed with the Head of L&amp;OD. This is to be presented to the force's COT for approval and budgeting</li> <li>On 14/03/22 the force's new ethics champion (Deputy Director, PSD) held CoLP's first Code of Ethics Working Group</li> <li>The force's data bias working group has met further times to discuss pertinent topics and agree the correct forum to take these forward</li> </ul>				<ul style="list-style-type: none"> <li>Finalise the framework for CoLP's E&amp;I staff inputs. These will be framed under the title <i>Values, Ethics, Equity and Belonging</i></li> <li>Review CoLP's existing external secondment process and look at opportunities for both short and long term secondments for leaders to develop skills</li> <li>Formalise data bias work within the existing force governance structure</li> <li>Finalise the plan for CoLP's annual E&amp;I award</li> </ul>						
<b>Recommendations to Operational Delivery Board</b>				<b>Decisions required by Operational Delivery Board</b>						
To consider the scope and detailed funding arrangements for <i>Values, Ethics, Equity and Belonging</i> inputs				To approve the scope and detailed funding arrangements for <i>Values, Ethics, Equity and Belonging</i> inputs						

Workstream	Community Engagement	Owner	Ch Supt Rob Atkin (Interim HQ)	Date	11/4/22	Project RAG		Benefit RAG		Key Performance Measures	
<b>Workstream objectives</b>				<b>Priority Deliverables</b>							<p><b>Police Community Encounters – Use of Powers</b></p> <ol style="list-style-type: none"> <li><b>Dip sampling of key police community encounters (stop and search / use of force / Road Traffic stops/ Firearms stops - internal senior officer dip sampling:</b> <ol style="list-style-type: none"> <li>Number sampled past month</li> <li>Number identified with learning</li> <li>Number identified as best practice</li> </ol> </li> <li><b>IASG feedback on key police encounters stop and search / use of force / Road Traffic stops / firearms stops.</b> <ol style="list-style-type: none"> <li>Number sampled / observed past month</li> <li>Number identified with learning</li> <li>Number identified as best practice</li> </ol> </li> </ol> <p><b>Community confidence / victim surveying measures</b></p> <ol style="list-style-type: none"> <li><b>Confident &amp; satisfied with City of London Police Actions</b></li> <li><b>Reducing the Black &amp; Minority and Gender satisfaction gap in survey data</b></li> </ol> <p><b>Number of community events attended</b></p> <ol style="list-style-type: none"> <li><b>Number of community events attended over the last month</b></li> <li><b>Outreach recruitment events expression of interest by ethnicity &amp; gender</b></li> </ol> <p><b>NB April update – these metrics are being currently developed for future reporting</b></p>
<ul style="list-style-type: none"> <li>Establish a Silver Group to lead on community engagement E&amp;I activity including outreach and attraction for recruitment</li> <li>Host community based outreach sessions for engagement and recruitment</li> <li>Establish longer term engagement with schools and colleges in order to attract and nurture future talent and introduce young people to policing</li> <li>Work with local strategic partners to develop a shared data set that will allow for a better understanding of the communities we serve</li> <li>Utilise data sets to better inform and identify areas of disproportionality and the negative impact on local communities</li> <li>Engage in a calendar of events with the local community to promote good relations</li> <li>Identify and engage with diverse communities to address possible adverse perceptions of the police service so that satisfactions levels improve across all communities</li> <li>Undertake meaningful involvement and consultation with local communities to review such tools as Stop and Search and Use of Force</li> <li>Evolve our force to be culturally competent to deliver legitimate and meaningful community policing</li> </ul>				Description		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					
Involve community in scrutiny of S/S, UoF wider police training		Ongoing									
<b>Progress since last update</b>						<b>Key next steps</b>					
<ul style="list-style-type: none"> <li><b>The CoLP, CoC and AWS Schools project</b> has concluded, and considered a success (43 students across 5 schools) (further projects likely to follow). Workshops introduced young people to the different types of digital careers available to them across policing and local government. The CoLP workshop was delivered online, and students given advice on how to obtain support, and report cyber bullying concerns to the police. Further, students were told about the different routes into policing, with some later expressing an interest to join at the end of the programme.</li> <li><b>Project Outreach</b> – Outreach events have targeted high footfall, diverse areas both inside and [mainly] outside of the City. This has led to a significant increase in applications (over 500), with many having completed their day-2 recruitment assessments already. There has also been a focus towards Universities (those offering degrees in Policing and Criminology) – these were a mixture of in-person events and online sessions. We have received excellent feedback from candidates &amp; community alike. Finally, there is sustained efforts at networking events and religious institutions to improve the diversity of applicants and this will continue for at least the next 6 to 12 months with a dedicated team in place.</li> <li><b>DWOs continue to engage regularly with Afghan refugees</b> being accommodated in the City. Considerable multi-agency and partnership working is still taking place, with CoLP providing support during the ongoing programme of 'Orientation Sessions,' that aim to provide assistance with adapting to life in the UK. Almost 250 presents were delivered to all children at Christmas 2021, following a collection organised by CoLP (and included donations from the City of London School for Girls and the Barbican/Golden Lane Community Group). The remaining presents left over will be provided to the Welcome Store for Ramadan gifts. Weekend sports activities were also arranged by TFG with support from Sector Policing for children over a period of weeks. This work will be expanded should Ukrainian refugees be housed in the City area.</li> <li>Following their launch last year, the next set of <b>Sector Cluster Panels</b> are scheduled to take place April/May. The first round were well attended by both business and residential communities, including Elected Members, and highlighted a number of themes that local policing will seek to address in the form of promises. These will be reported on at future meetings and on our website.</li> <li>Plans are underway to develop a new <b>Night Time Economy Plan</b> building on successes from recent operations particularly at Christmas with the overall intention, to reduce the level of crime and disorder in the area and provide a safer environment for residents and genuine visitors, who come to enjoy the Night-time Economy. The plan will consider how best we proactively engage with City stakeholders, and take every opportunity to communicate and build a good rapport with the public with public protection and safeguarding at the core (linked to our Violence Against Women &amp; Girls Safer Places action plan).</li> <li>Plans are progressing to introduce a <b>Youth Independent Advisory Group (YIAG)</b>, which will be administered by the Partnership and Prevention Hub (P&amp;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).</li> <li>The Strategic Research &amp; 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.</li> <li><b>These updates should be read in conjunction with the PAB community Update paper which has more business as usual tactical delivery contained therein.</b></li> </ul>						<ul style="list-style-type: none"> <li><b>Refresh mapping of communities</b> (via Strategic Research &amp; Analysis) using latest available datasets (e.g. Census data - 2022) to accurately reflect the current picture within the City.</li> <li><b>Operation Rocotto 3</b> will take place in May 2022. This follows two previously successful high visibility engagement days in collaboration with the City Security Council. Again, this will see both Police and Security working in partnership to deliver reassurance and targeted engagement activities across the City.</li> <li><b>Project Outreach</b> in support of the wider Operation Uplift programme will continue to conduct targeted recruitment engagement utilising dedicated resources under the direction of a newly appointed senior leader at Chief Inspector level.</li> <li>Comprehensive review of <b>AWS project</b>, evaluating feedback from participating students and lessons learnt from the wider CoLP / CoL / AWS project delivery team with a view to re running and expanding programme across a greater number of schools within London.</li> <li>Work will continue to grow the <b>Police Cadet</b> Unit within the force including increasing events and visibility across the City. Cadet numbers are currently 29 cadets, 12 male and 17 female, with 48% from black, minority heritage.</li> <li>Planning continues for a <b>community open day</b> in the Summer</li> <li>Develop further the work and process of the IASG in respect of community monitoring of stop and search / use of force within the force area.</li> </ul>					
<b>Recommendations to Operational Delivery Board</b>						<b>Decisions required by Operational Delivery Board</b>					
None at this stage						None					

Workstream	Recruitment, Onboarding and L&OD	Owner	Julia Perera-Director of HR	Date	13/04/22	Project RAG		Benefit RAG	
------------	----------------------------------	-------	-----------------------------	------	----------	-------------	--	-------------	--

Workstream objectives	Priority	
	Description	Date
<ul style="list-style-type: none"> <li>• CoLP to undertake detailed analysis of workforce data and produce aspirational targets</li> <li>• Complete a cradle to grave review of all recruitment processes</li> <li>• Review our vetting approach with regards to those with protected characteristics with a priority focus on minority ethnic groups</li> <li>• Set up feedback processes for unsuccessful candidates and promote development plans for future potential candidates</li> <li>• Ensure transparency with all recruitment, progression and exit from service data in respect to all protected characteristics</li> <li>• Ensure diversity visibility throughout recruitment process</li> <li>• 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</li> <li>• Police leaders should consider the use of ‘reverse mentoring’ to be more engaged with their workforce</li> <li>• Equip selection panels with unconscious bias training for all those involved in the recruitment process</li> <li>• Invest in training and development of Police leaders</li> <li>• CoLP to develop a talent management program for upward and lateral development</li> <li>• CoLP to ensure mentoring/coaching and support mechanisms are in place to support officers with protected characteristics</li> <li>• 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</li> <li>• Review the PCDA programme to ensure it aligns with E&amp;I plans and principles</li> </ul>	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	Ongoing
	Community Engagement plan for PEQF	March 2022
	PALs cohort 2 launch	March 2022
	Pilot of Mentivity Training #2	Feb 2022
	Delivery of forcewide awareness programme on Values, Ethics, Equity, Belonging – ‘Our People, Our Values’	June 2022

This page is intentionally left blank

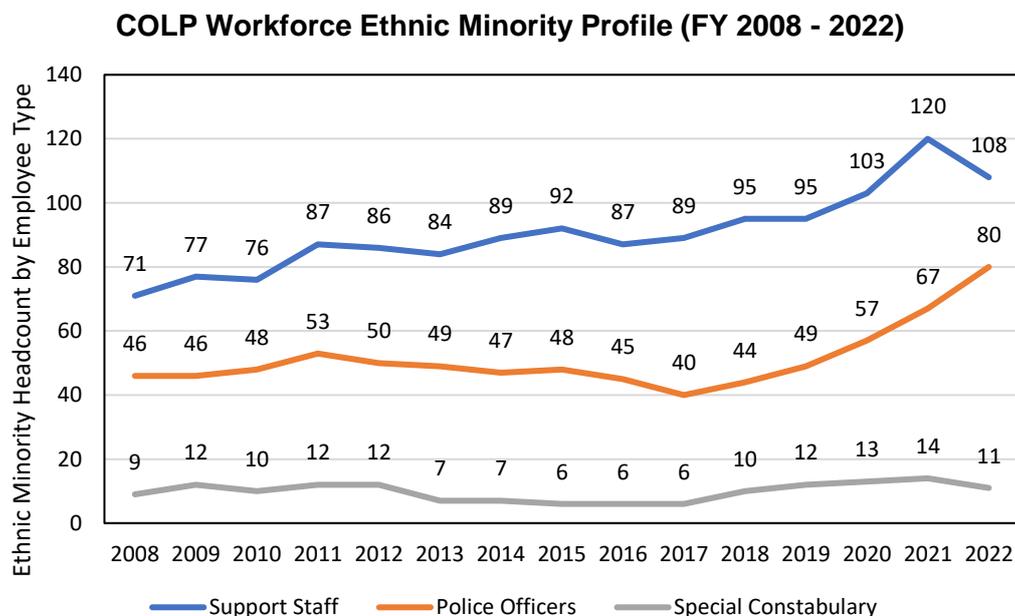
## Appendix B- Equality and Inclusion update to Professional Standards and Integrity Committee

### Diversity Workforce data and analysis

#### Ethnicity

- For this reporting period (1<sup>st</sup> October 2021 to 31<sup>st</sup> March 2022), the number of Black and Minority Police Officers has increased to 80, (an increase of 7 since the last reporting period (73)) which is in part due to a Student Officer intakes in September 2021 and March 2022. The number of Black and Minority Police Staff has decreased to 108 (a decrease of 7 since the last reporting period (115)), this decrease is due to a number of leavers. The graph below represents the trend for number of Black, Asian and Minority Police Staff, Officers and Special Constabulary within the City of London Police (CoLP) at the end of the financial year from 2007/8 to 2021/22.
- When compared nationally, CoLP Staff Black and Minority representation rate is currently ranked as second highest among all national forces (not including BTP) and is sixth highest for Officer representation (not including BTP<sup>1</sup>).
- The Force's Equality & Inclusion Operational Board oversees the work on the National Police Chiefs Council (NPCC) plan. The Force has made improvements in a number of areas and now has innovative advertising and attraction campaigns and is supporting internal applicants through application writing and interview workshops. In addition, there has been an introduction of a buddy system where Black and Minority officers are supported from a buddy when they join the Force.

#### CoLP Workforce Profile by Ethnicity 2008-2022 (financial year)



<sup>1</sup> Exclusion of British Transport Police (BTP)- the main reason for this is that they are not a Home Office Force nor part of the 43 territorial forces. Police Workforce Census includes them in their stats for some areas as accompaniment, but excludes them from most analysis because they are not a HO force.

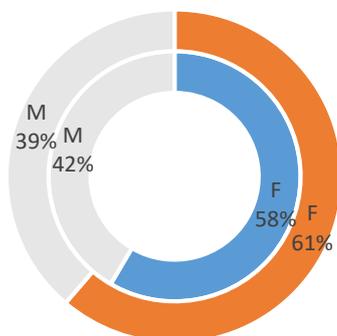
## Gender

4. The percentage of female Police Officers stands at 24% in March 2022. As part of 2019-2024 People Strategy, CoLP is continuing to undertake a number of activities to improve female representation. Approximately 26.3% of applications received for the Police Officer recruitment campaigns (internally and externally advertised) were from female applicants; 16% of Police Officer joiners were female in the reporting period. We are seeking to increase our female representation by a number of methods including the wording of our adverts to reflect more flexibility in our offerings including part time.
5. The national average for female Police Staff stands at 61.2% as of 31 March 2021, as of March 2022 CoLP's female Police Staff representation rate is 58.4% (staff within the Next Generation programme are not counted on the Forces strength due to it being a two-year funded programme). It is worth noting that the Force has a more even representation of male and female Police Staff.
6. With regard to improving our female representation we are looking at retention strategies such as supporting females back to the workplace following maternity leave as well as bespoke attraction campaigns and amended recruitment adverts which support flexible working.
7. Following the second successive year of the Direct Entry Detective Programme where we worked with Police Now (75% of those joining are female) we are looking at using a similar entry route for 2022/23 but with a higher intake of recruits. During our student officer campaigns we have been running positive action events including webinars to candidates where we have our female officers taking part to encourage female applicants to apply.

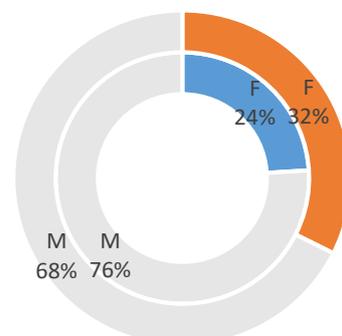
## Gender Comparison

- City of London – March 2022
- National Comparison (England and Wales) - March 2021

**Staff Gender Profile**

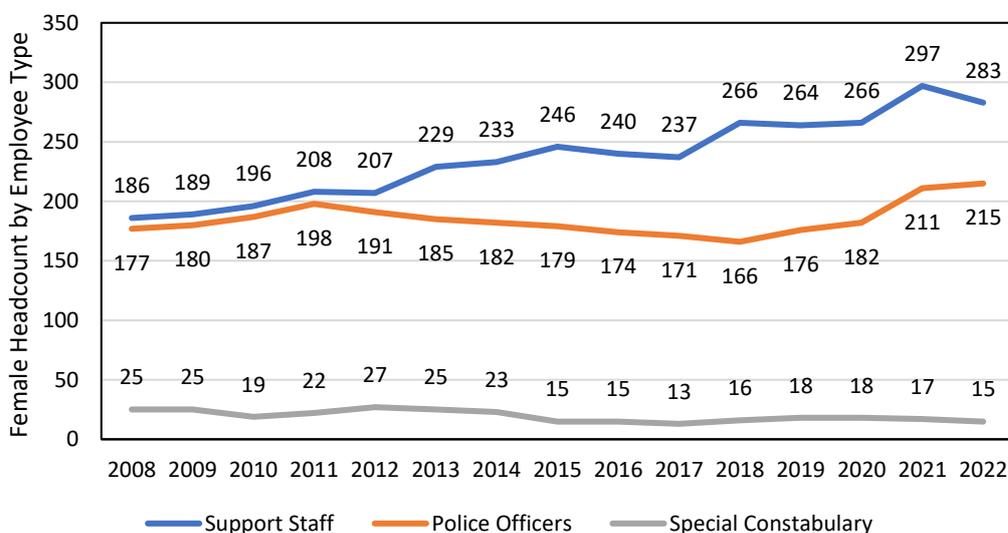


**Officers Gender Profile**



## Workforce Female Gender Profile – 2008-2022

### CoLP Female Workforce Profile (FY 2008 - 2022)



### Disability

8. The CoLP's disability profile remains similar to data previously reported in the first 6 months of 21-22, with 20 Police Officers and 12 Police Staff currently identifying themselves as having a disability.
9. As of 31st March 2022, 46 Officers are working under 'recuperative duties' (short term) and we currently have 33 Officers on adjusted duties (long term). The Force has also recently introduced Dyslexia Assessors to support colleagues on all matters related to dyslexia including reasonable adjustments.

### Sexual Orientation

10. All Police Officers and Police Staff are invited to define their sexual orientation on application to the City of London Police. Across the workforce, 38 members of Staff and/or Police Officers have identified themselves as gay, lesbian or bisexual (up from 36 previously reported), with 857 employees choosing not to disclose this information or choosing "prefer not to say".

### Age

11. The current age profile of the Police Staff workforce ranges between 18 and 65+. There are currently 185 Police Staff aged 50 and over. 301 members of Staff are between the ages of 18 and 49.
12. The age profile of Police Officers ranges between 20 and 60+. There are currently 165 Police Officers aged 50 and over. Police Officers can retire once 30/35 years' service has been completed (depending on pension scheme). The Force currently has 11 Officers who have 30 or more years' service and therefore could be eligible to retire. There also another 24 Officers that could be eligible to retire in 2022/2023 as they currently have 29 years' service.

## **Religion and Belief**

13. Currently 21.9% of the total workforce (Police Officers & Police Staff) identify themselves as 'Christian'; 2.3% as 'Muslim'; 0.7% as 'Hindu', 0.6% as Buddhist. 1.3% identified as having another religious belief, 0.3% as Judaism and 0.5% as Sikh, whereas 72.4% either have no religion, prefer not to say or have chosen not to disclose their religion or belief.



If you have the passion and professionalism to be the difference...

Then apply to become a police constable with the City of London Police

# JOIN US



Starting at £31,686 per annum ●

Subsidised rail travel scheme – 70 miles ●

Free Oyster Card for TfL London travel ●

## ENTRY ROUTES

● **Police Constable Degree Apprenticeship Scheme (PCDA)**- If you want to work towards a degree, minimum level 3 qualification (A-Level or equivalent)

● **Police Constable Graduate Entry Programme (DHEP)**- For applicants who already have a degree.

● **Initial Police Learning & Development Programme (IPLDP)**- Blended On the Job and classroom based learning, minimum level 3 qualification (A-Level or equivalent)

● **Professional Policing Degree Pre-Join Pathway**- For Graduates of the Professional Policing BSc degree only



SCAN ME

This page is intentionally left blank

<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Dated:</b> 25 May 2022
<b>Subject:</b> Integrity and Code of Ethics update	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1- People are safe and feel safe
<b>Does this proposal require extra revenue and/or capital spending?</b>	N/A
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	N/A
<b>Report of:</b> Commissioner of Police Pol 32-22	<b>For Information</b>
<b>Report author:</b> Ian Younger, Deputy Director Professional Standards Dept, Professionalism Portfolio	

## Summary

This report provides Members with an update of the work of the Forces Ethics and Integrity Lead, the Force's Integrity Standards Board (ISB), regional and national activity of relevance, and an update on the Integrity Standards dashboard and the Ethics and Integrity delivery plan for 2022.

## Recommendation

It is recommended that Members note this report.

## Main Report

### **Integrity Standards Board (ISB) – 8 February 2022**

1. The last ISB meeting was held on the 8 February and was chaired by Assistant Commissioner Betts.
2. The Integrity Dashboard for Q3 was presented at the previous Professional Standards and Integrity Committee (PSIC) in February. As there has not been another ISB meeting since February the Q4 Dashboard has yet to be prepared and presented internally. The next meeting is scheduled for the 16 June. However, consideration is being given to combining the Board with other existing work strands on Trust and Confidence. A further update will be given at the September meeting of the PSIC.

### **National & Regional Developments**

3. A meeting of the Wales, West and London Region Ethic Panel met on the 28 April 2022.

4. The Panel considered ethical dilemmas in respect of medical records and was split into two parts.
5. The first concerned Data Integrity and the viewing of victims' medical records on Force systems, identifying historic offences which were then recorded under Home Office Counting Rules (HOCR) as a third party report of a crime by a professional person.
6. This was considered to be a very strict interpretation of the HOCR which has been enforced by HMICFRS and which was seen as unnecessary. It was acknowledged that, while technically in compliance with HOCR, it was unlikely, depending on the historic nature of the incident, that any crime would be investigated (against the victim's wishes). It was also acknowledged that there had to be a balance in the responsibility for protecting vulnerable victims.
7. This dilemma is being submitted to the National Ethics Panel for consideration of getting some form of National Guidance from NPCC.
8. The second part of the dilemma considered the disclosure of victim's medical records to the defence in rape cases.
9. In relation to disclosure in rape cases, it was felt that there were sufficient safeguards in the Criminal Proceedings & Investigations Act 1996 to ensure that sensitive material was handled appropriately, and disclosure was only made when relevant. It was also noted that the investigating officer must ensure that only relevant medical records are requested rather than a full medical history. It is hoped that this will form part of future national guidance.
10. These issues are examples of good practice discussions that take place within panels and which have real operational impact.
11. At the meeting, Sussex Police presented an Ethics and Integrity Survey which was developed in association with academia. It was agreed that this is something that all member forces could use. For CoLP, early adoption and implementation of this survey model would allow us to set a baseline from which re-runs of the survey at appropriate intervals will help to show progress of the Development Plan. It is intended that the survey will be presented to the ISB for consideration of adopting within CoLP once it has been considered in the round with the Force's new approach to Surveys to bring them all into one place.

### **Ethics and Integrity Development Plan Progress**

12. The new Integrity Plan model was considered at ISB in February, a stakeholder's workshop was held in March to launch the Plan. Due to time constraints only the 'Commit' aspects were considered. Stakeholders were then asked to provide input via email and this is being collated and progressed.
13. Further work is required to finesse the plan and agree it via the Force's internal governance- Trust and Confidence Board chaired by AC Betts. In future it will be presented to this Committee by way of highlights set out in this report.

## **Options**

There are no options or proposals within this report.

## **Corporate & Strategic Implications**

- Strategic implications –The Integrity Standards Board and Plan supports the City of London Policing Plan 2022-25 values of Professionalism and Integrity
- Financial implications – none.
- Resource implications – none.
- Legal implications – none.
- Risk implications – none.
- Equalities implications – none.
- Climate implications – none.
- Security implications – none.

## **Conclusion**

14. Supporting integrity and the Code of Ethics through business as usual is an important element of the work of the Professionalism and Trust portfolio and will continue to be monitored by this Committee.

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

This page is intentionally left blank

## 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 consider 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 repetitive.
- 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 repetitive.
- 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

**Niche:** City of London Police Crime and Intelligence system

**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

**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 1<sup>st</sup> Feb 2020 following changes to Police Conduct Regulations)

<b>Old Allegation Types (pre Feb 2020)</b>		
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

<b>New Allegation Types (post Feb 2020)</b>		
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) 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) 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) 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) 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) 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) 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) 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) 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) 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) 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) 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) 2 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank