



## Professional Standards & Integrity (Police) Committee

**Date:** TUESDAY, 29 NOVEMBER 2022  
**Time:** 10.00 am  
**Venue:** COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

**Members:** Caroline Addy (Chair)  
Deborah Oliver (Deputy Chairman)  
Nicholas Bensted-Smith  
Tijs Broeke  
Alderman Professor Emma Edhem  
Deputy James Thomson  
Jason Groves  
Florence Keelson-Anfu  
Michael Mitchell (External Member)  
Alice Ripley (External Member)

**Enquiries:** Richard Holt  
Richard.Holt@cityoflondon.gov.uk

A recording of the public meeting will be available 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 Professional Standards and Integrity Committee held on 26<sup>th</sup> of September 2022.

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

4. **OUTSTANDING REFERENCES**

Joint report of the Town Clerk and Commissioner.

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

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

Report of the Commissioner.

**For Information**  
(Pages 13 - 20)

6. **QUARTERLY EQUALITY AND INCLUSION UPDATE**

Report of the Commissioner.

**For Information**  
(Pages 21 - 58)

7. **ACTION FRAUD STATISTICS – QUARTER 2 –1ST JULY 2022 – 30TH SEPT 2022**

Report of the Commissioner.

**For Information**  
(Pages 59 - 68)

8. **REVIEW OF THE BARONESS CASEY MISCONDUCT IN THE METROPOLITAN POLICE SERVICE- INTERIM REVIEW OF RECOMMENDATIONS FOR THE CITY OF LONDON POLICE**

Report of the Commissioner.

**For Information**  
(Pages 69 - 74)

9. **POLICE UPLIFT PROGRAMME- FOCUS ON DIVERSITY**

Report of the Commissioner.

**For Information**  
(Pages 75 - 84)

10. **Q1 & Q2 STOP AND SEARCH AND USE OF FORCE UPDATE 2022-23**

Report of Commissioner.

**For Information**  
(Pages 85 - 92)

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 Professional Standards and Integrity Committee held on 26<sup>th</sup> of September 2022.

**For Decision**  
(Pages 93 - 96)

15. **NON-PUBLIC REFERENCES**

Joint report of the Town Clerk and Commissioner.

**For Information**  
(Pages 97 - 98)

16. **COLP REVIEW OF HISTORIC SEXUAL MISCONDUCT CASES- OP HOOD**

Report of the Commissioner.

**For Information**  
(Pages 99 - 136)

17. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 2 –1ST JULY 2022 – 30TH SEPT 2022**

Report of the Commissioner.

**For Information**  
(Pages 137 - 174)

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

Monday, 26 September 2022

Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Monday, 26 September 2022 at 2.00 pm

### Present

#### Members:

Caroline Addy (Chair)  
Deborah Oliver (Deputy Chairman)  
Alderman Professor Emma Edhem  
Deputy James Thomson  
Jason Groves  
Michael Mitchell (External Member)

#### Officers:

Paul Betts	- City of London Police
Sanjay Andersen	- City of London Police
Carly Humphreys	- City of London Police
Richard Holt	- Governance Officer, Town Clerk's Department
Hayley Williams	- City of London Police
Dermont Robinson	- City of London Police
Ian Younger	- City of London Police
Claire Cresswell	- City of London Police
Alix Newbold	- Interim Director, Police Authority Team, Town Clerk's Department
Rachael Waldron	- Police Authority Team, Town Clerk's Department

#### 1. APOLOGIES

Apologies were received from Tijs Broeke, Florence Keelson-Anfu and Nicholas Bensted-Smith.

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

There were no declarations of interest.

#### 3. MINUTES

The Committee considered the public minutes and non-public summary of the Professional Standards and Integrity Committee meeting held on the 25th of May 2022.

**RESOLVED-** That the public minutes and non-public summary of the Professional Standards and Integrity Committee meeting held on the 25th of May 2022 be approved as an accurate record.

4. **REFERENCES**

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

**RESOLVED** - That the Report be noted.

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

The Committee received an oral update from the Assistant Commissioner on the Integrity and Code of Ethics.

The Committee discussed the importance of the newly established Listening Circles for women in the City of London Police and suggested that these be established for other protected characteristics and the concept be extended to the City of London Corporation.

Replying to a query from a Member Officers confirmed that the Force was keen to work with the City of London Corporation to reach as wider audience as possible with regard this outreach.

The Police Authority Board Chair asked for an update on proportional allocation of staff resource and the role of the Safer City Partnership. It was confirmed that qualitative and quantitative data was analysed to assess the success of the allocation of resources and that the Safer City Partnership was engaged appropriately.

**REVOLVED-** That the update be noted.

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

The Committee received a report of the Commissioner which provided an update on the Violence against Women and Girls activity (VAWG). The Chair welcomed the Temporary Chief Superintendent to their first meeting of the Committee and noted the positive steps taken on the introduction of the listening circles for women in policing.

The Committee discussed the Force's engagement with the local VAWG sector representatives and how the National Police Chiefs' Council analysis of safe spaces being incorporated into the City of London Corporation's polices.

The Committee requested further information on the implementation of internal inclusion policies. It was confirmed that Officers were comfortable with the formal disciplinary procedures but noted that issues could be caused at a lower-level by inappropriate behaviour and culture which needed to be continually challenged. Additionally, it was noted that the Force had been chosen as an ice breaker organisation for key actions from the National Race Action Plan

Following a request from the Chair of Police Authority Board Officers undertook to review whether the establishment of a Banter Policy for the Force would be appropriate for the City of London Police.

In response to a Member's query it was confirmed that that an anonymised Staff survey for staff was completed annually and this included a reporting system for staff concerns regarding equality and inclusion. The Chair noted that staff perception of issues, even if not correct, were important to note. It was confirmed that the results of the survey would be presented to Members in due course once the Force had run the survey.

The Chair noted the risk for the Force when dealing with legal but harmful online content, with regard to the Online Harm Bill.

Following a question from the Chair Officers provided an update on the Police-Perpetrator Super Complaint.

**RESOLVED-** That the report be noted.

## **7. QUARTERLY EQUALITY AND INCLUSION UPDATE**

The Committee received a report of the Commissioner on the Quarterly Equality and Inclusion Update.

The Committee discussed the City of London Police Public Sector Equality Duty report 2021, the Force's current staff exit process and the Hate Crime Awareness Week.

The Committee noted concerns regarding the diversity of those joining the Force as part of the uplift programme. In response Officers explained the factors affecting the diversity of those hired including the need to hire those with specific skill sets and the impact of the Metropolitan Police's uplift programme on the demand for qualified candidates.

The Committee noted that the appropriate communication of why the staff diversity statistics were requested was key for successful engagement.

A Member requested that future report include numbers as well as percentages, especially for some of the protected characteristics such as religion and belief where possible. and for the statistics to be uniform in their presentation.

**RESOLVED-** That the report be noted.

## **8. ACTION FRAUD STATISTICS – QUARTER 1 –1ST APRIL 2022 – 30TH JUNE 2022**

The Committee received a report of the Commissioner on the Action Fraud Statistics Quarter 1, 1st April 2022 – 30th June 2022.

The Chair noted the different impact to victims of online crime in comparison to physical crime and noted that there was a question on how many users of the Action Fraud system who experienced issues, did not make formal complaints.

The Committee noted that education and prevention was key to successfully combating fraud. It was confirmed that learnings from complaints received had been incorporated into the requirements for the procurement of the future Action Fraud

services. A Member noted that appropriately sensitive communication was key when dealing with victims of fraud.

**RESOLVED-** That the report be noted.

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

There were no questions received in the public session.

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

There was no urgent business considered in the public session.

11. **EXCLUSION OF THE PUBLIC**

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

12. **NON-PUBLIC MINUTES**

The Committee considered the public minutes and non-public summary of the Professional Standards and Integrity Committee meeting held on the 25th of May 2022.

**RESOLVED-** That the non-public minutes of the Professional Standards and Integrity Committee meeting held on the 25th of May 2022 be approved as an accurate record.

13. **NON-PUBLIC REFERENCES**

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

**RESOLVED** - That the Report be noted.

14. **REVIEW OF CITY OF LONDON POLICE JUVENILE STRIP SEARCHES JANUARY 2019- APRIL 2022**

The Committee received a report of the Commissioner regarding the on the Review of City of London Police juvenile Strip searches January 2019-2022.

**RESOLVED-** That the report be noted.

15. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 1 –1ST APRIL 2022 – 30TH JUNE 2022**

The Committee received a report of the Commissioner on the Professional Standards Statistics Quarter 1 1<sup>st</sup> April 2022 30<sup>th</sup> June 2022.

**RESOLVED-** That the report be noted.

16. **PCR CASE SUMMARY AND PCR REPORTS**

Members received a report of the Commissioner regarding a series of PCR Case Summaries.

**RESOLVED-** That the report be noted.

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

There were no questions considered in the non-public session.

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

There was one items of urgent business considered in the non-public session.

**The meeting ended at 3:45pm**

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Chair

**Contact Officer: Richard Holt  
Richard.Holt@cityoflondon.gov.uk**

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PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

**PUBLIC OUTSTANDING REFERENCES**

10/2022/P	<b>Item 6 Update on violence against women and girls (VAWG) activity</b>	Following a request from the Committee Officers undertook to review whether the establishment of a Banter Policy for the Force would be appropriate.	Commissioner of Police	<b>Complete-</b> The Force has considered this request. A review of the existing Police Regulations and HR policies in place has confirmed that these already adequately cover this area in terms of staff accountability for all behaviour standards expected in the workplace. A separate policy is not required. Additionally, work is being taken forward under the Equality and Inclusion portfolio- Leadership and Culture work strand, on Internal Culture, with a series of events running in November and December 22.
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<b>Committee(s):</b> Strategic Planning and Performance Committee  Police Authority Board  Professional Standards and Integrity Committee	<b>Dated:</b> 17 <sup>th</sup> November 2022  24 <sup>th</sup> November 2022  29 <sup>th</sup> November 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 102-22	<b>For Information</b>
<b>Report author:</b> T/Chief Superintendent Sanjay Andersen; DCI Carly Humphreys, Professionalism and Trust Directorate	

## 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

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<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 quarterly reports to your Committees.

### **Current Position**

#### Key Milestones (Quarter 3)

- **Plan on a Page:**  
In recognition of the need to ensure that the CoLP's (CoLP) VAWG Strategy is clearly and consistently communicated across all areas of the organisation, a 'Plan on a Page' has been developed (Appendix A). This is currently out for consultation and once a final version agreed, will be disseminated across the organisation utilising a variety of communication methods, such as team cascade briefings and open events in the canteen. A public version of this plan will also be disseminated across our communities, to demonstrate in a concise way, the organisation's commitment and progress in tackling VAWG.
- **Academic support:**  
The City of London Police has a successful internship programme with University College London. The Professionalism and Trust team will be working with a student to support an academic review of our VAWG Strategy. The over-arching aim will be to establish an evidence-base for our performance in this area, identify good practice and any areas for improvement. This will be an objective review and provide an external lens to show how effectively CoLP is delivering on the VAWG Strategy. This work is embryonic and consequently a more detailed update will be provided for the February 2023 Committees.

### **National**

2. October 2022 will mark the one-year anniversary of the establishment of the NPCC (National Police Chief's Council) taskforce. The CoLP has been invited to an NPCC event where there will be a presentation on national collective progress, a summary will be provided in the next Committee report.

Members will recall that in April 2022, all forces nationally submitted their internal VAWG Action Plan to the NPCC for initial national performance

benchmarking. In September 2022, forces were again asked to re-submit their Action Plans to demonstrate ongoing progress. Prior to this submission, the CoLP completed performance benchmarking on the Plan, this revealed that we are delivering in all areas (based upon a RAG grading) and that no areas of concern have been identified. As with the submission in April, we anticipate feedback to be presented to forces as a national policing response to VAWG; an update will be expected in time to present to members at the next Committee meeting.

### **Regional**

3. The CoLP remains in a working group with the British Transport Police and Metropolitan Police. There is nothing to note for Committee members during this quarter.

### **Local**

4. Since our most recent update to members in September 2022, the CoLP has continued to develop work to tackle VAWG by delivering sustainable change, as outlined in the key milestones. The following local updates highlight work currently in development:

## **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.

- HeForShe<sup>2</sup>: A CoLP campaign lead has now been identified and a meeting with the national team has taken place to support our internal implementation. A six-month re-launch plan has been completed and will be supported by trackable actions; this is currently under internal consultation.
- Professional Standards: As previously updated, our Professional Standards Department (PSD) has completed the review of live, recent and historical sexual misconduct cases to ensure that all concerns raised have been dealt with appropriately. This report is now in the final review stage and following this will be presented to the Chief Officer team. A summary of the report will be provided to the subsequent Police Authority Board and Police Standards and Integrity Committee.

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<sup>2</sup> [Home Page | HeForShe](#)

- **Leadership and Culture:** The Leadership and Culture strand of our Professionalism and Trust team continues to develop upon 'Our People' framework. This will support initiatives for self-development whether for promotion or lateral moves. There are specific elements with this framework which are designed to support the progression of females in the workforce, such as the recent 'Leading with Impact' course which was extremely well attended.

In addition, the 'Our People' Inclusivity Programme will run as a mandatory event for all employees and will take place across a number of dates in November and December at Aviva. The event will contain a blend of leadership and culture-focused inputs, framed around inclusion and compassionate leadership. An intrinsic focus will be around Ethics, Mentivity and challenging inappropriate behaviour.

## **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.

- **Vulnerability training:** Ensuring that the workforce is equipped to deal with VAWG remains at the forefront of our Strategy. Practically, a significant part of this work has involved a force-wide skills gap analysis for all employees. As a result, vulnerability training has now become mandatory for all officers. It has already been rolled out to 800 officers, with 60 outstanding. Prioritisation also remains to deliver the new Domestic Abuse Matters training, for which 240 officers have already attended and provided complimentary feedback. The next steps will be to have a cohort of 'trained – trainers' to ensure that we can deliver to the entire workforce at pace.
- **VAWG Problem Profile:** This has provided a comprehensive overview of the impact of VAWG in the City of London. The profile has been cascaded to key internal stakeholders and micro-briefings are being arranged with these business area leads by the Professionalism and Trust team, this will ensure that any risk areas are addressed, and good practice disseminated locally, regionally and nationally.

## **NPCC Objective 3- Create Safer Spaces**

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.

- Operation Reframe: A successful monthly partnership Safety Hub continues to operate. Monthly performance reports are produced to track the impact of this collaborative initiative. The results for August and September 2022 are summarised below:

#### **August:**

**Welfare hub:** Approximately 50 persons visited the welfare area. This provided opportunities for CoLP and partnership agencies to engage and raise awareness around personal safety.

**Interventions:** There were 2 people safeguarded whilst their experienced mental health episodes. First aid was also provided to an injured female and 4 heavily intoxicated lone persons, including a teenage female, were supported to facilitate safe travel home.

**Licensed premises:** 27 licensed premises were visited and inspected.

#### **September:**

**Welfare hub:** Approximately 10 persons visited the welfare area. As above, this provided opportunities for CoLP and partnership agencies to engage and raise awareness around personal safety.

**Interventions:** Of note, there were two arrests made for Fraud in relation to persons working as SIA door staff without accreditation.

**Licensed premises:** 39 licensed premises were visited and inspected, this included 25 drinks being tested for spiking across 2 venues as a reassurance and educational exercise for patrons.

This Operation will be further developed as a model for the upcoming Christmas Campaign where footfall in the City and within licensed premises will increase.

- Licensing checks: The CoLP Licensing Team complete weekly compliance checks on venues on a Thursday, Friday and Saturday, this is also mirrored by the Corporation Licensing team. Venues attended will differ weekly, however those graded with Red or Amber concerns, will be visited each week. Over a 3 month period, the Licensing Team have also conducted compliance visits with every late night levy premises. A full report of activity is regularly presented to the Licensing Committee.
- Ask for Angela: WAVE (Welfare And Vulnerability Engagement)<sup>3</sup> training has also been completed by the Safer Business Partnership to support the Ask for Angela campaign. Currently, 284 people have been trained across 55 venues in the City. Ask for Angela quality assurance checks

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<sup>3</sup> [WAVE Training — Safer Sounds Partnership](#)

are conducted by the Licensing Team, with the purpose to ensure that staff working at these campaign venues are sufficiently trained.

## **Governance**

5. The City of London Police's strategic and tactical delivery on VAWG is being scrutinised at a national and local level, as advised in previous committee reports.

## **Conclusion**

6. 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.

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'.

## **Appendices**

### **Appendix A- Draft Plan on a Page- VAWG Strategy**

#### **Contacts:**

**Sanjay Andersen**

T/Chief Superintendent

[Sanjay.andersen@cityoflondon.police.uk](mailto:Sanjay.andersen@cityoflondon.police.uk)

**Carly Humphreys**

Detective Chief Inspector

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

# Violence Against Women & Girls



Professionalism&Trust@  
cityoflondon.police.uk



We will continue to work in partnership to prevent and unequivocally respond to Violence Against Women & Girls

## Our Plan



Our priority will be to deliver this plan across 3 areas

- Building Trust and Confidence
- Relentless Perpetrator pursuit
- Creating Safer spaces

## What



There continues to be tragic instances of VAWG across the UK. Working with partners, we want to do more to ensure women & girls are safe and feel safe within the City of London

## Why

Days of Action focusing on pursuit of perpetrators



DA Matters Training



Safer Spaces



Op Reframe

Partnerships

Empowering our workforce



HOW

## Outcomes

- Strengthen trust & confidence between women, girls & the police
- Keep those who live, work and visit the City safe and feeling safe
- Make policing a hostile environment for perpetrators of VAWG

Please keep for reference

[Policing violence against women and girls - National framework for delivery: Year 1](#)  
([npcc.police.uk](#))

[city-of-london-policing-plan-2022-2025.pdf](#)  
([cityoflondon.police.uk](#))

[strategic-delivery-plan.pdf](#)  
([cityoflondon.police.uk](#))

LINKS



A local service with a national role, trusted by our communities to deliver policing with professionalism, integrity and compassion



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<b>Committee(s):</b> Professional Standards and Integrity Committee  Police Authority Board	<b>Dated:</b> 29 November 2022  12 December 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 114-22  <b>Report author:</b> T/Chief Supt Sanjay Andersen; DCI Carly Humphreys, Professionalism and Trust	<b>For Information</b>

## Summary

This report provides an update regarding Equality & Inclusion (E&I) activity within the City of London Police (CoLP) from a national and local perspective, since the last update to your September Committee. Appendix A provides a number of slides to outline our delivery of the E&I Strategy through a consolidated E&I Delivery Plan.

The report also includes highlights of activity regarding the E&I workstreams, in addition to updated Key Performance Indicators (KPIs) for Equality and Inclusion and Diversity Workforce Data.

## Recommendation(s)

It is recommended that Members note the report.

## Main Report

### Background

- The Delivery Plan provided in Appendix A represents a consolidated Plan for all outstanding deliverables across the below plans:

- National Police Chiefs Council (NPCC) Equality & Inclusion (E&I) Plan;
- Police Authority Board (PAB) recommendations;
- Tackling Racism Taskforce (TRTF) recommendations;
- Black and Minority Ethnic Action Plan, and
- Lesbian, Gay, Bi-sexual and Transgender + (LGBT+) Action Plan.

The Plan is arranged in cross cutting workstreams and is regularly updated for internal and external review and scrutiny, most recently discussed at the October E&I Strategic Board.

## **Current Position**

### **b. National updates:**

As previously updated, the national Police Race Action Plan (PRAP) was released as a first iteration in May 2022. This required all forces to individually engage with members of the public, business specific communities, and internal employees; the Professionalism and Trust (P&T) team ran a number of specific sessions to provide an opportunity for them to feed-back on the Plan. Nationally, 5,100 responses were received, it has been reported that these have been largely supportive

This was consistently communicated internally and externally through articles and links to the national work, in addition to specific feedback sessions run by the Professionalism and Trust (P&T) team. Nationally, this has provided 5,100 responses which are reported to have been largely positive about the steps being taken by Policing to become anti-racist. The City of London Police (CoLP) has been selected as an 'ice breaker' force and will work closely with the NPCC Task and Finish groups to promulgate good practice across the four workstream areas of:

1. Internal Culture and Inclusivity (ice breaker area).
2. Use of Police Powers (ice breaker area).
3. Community Engagement and Relations.
4. Protection against Victimisation.

The P&T team is working with our Black Police Association (BPA) to translate the PRAP into a local delivery plan which also consolidates local recommendations, such as staff surveys and independent assessments. This plan is now in final review with the Black Police Association (BPA) and will be released across the organisation once completed. To reassure members, the PRAP was disseminated to business and thematic leads for ownership around actions earlier this year. This has ensured that we make early progress before we receive a both a final version of the PRAP and the local consolidated Action Plan which will be refreshed in line with the national updates.

The P&T team await the results of their contribution to the pilot survey of Black and Black-heritage police officers and staff which was co-ordinated by the National Police Chiefs Council (NPCC) and Home Office's Police Uplift Programme.

Members will note that a detailed report for VAWG is included in the committee pack for review.

**c. Local updates:**

- The Equality and Inclusion Manager is continuing to work with the Head of Strategic Development to refresh and publish our new Equality and Inclusion Strategy. This will be shared with Committee Members following internal sign-off.
- The organisation has now procured a mid-term review of our position within the Inclusion Maturity Model to help establish how we are progressing. The review will consider our policies, processes, staff surveys, HR data, EDI Action Plans, training & development, recruitment, senior leadership messaging and general communication. The review should be completed by the end of January 2023 and the Board Members will be updated with progress in the next Committee paper.
- The staged review of the organisation's Equality, Diversity & Inclusion (EDI) processes are still ongoing. As previously updated, *Stage One* (initial consultation) has been completed. *Stage Two* remains ongoing, a refreshed ToR (Appendix B) has now been agreed, there is also a full review of the Staff Support Networks and Associations (SSNAs) underway; this has now also included a re-allocation of Workstream Leads following new Chief Superintendent appointments. The next step will be *Stage 3* and will focus on a review of our overarching Equality, Diversity & Inclusion (EDI) Action Plan, particularly to ensure that national changes are reflected in our local plan and compliment our work within our VAWG (Violence Against Women and Girls) and Race Action Plans. Additional work will also review the support programmes and schemes we offer for underrepresented groups, such as our successful PALs (Positive Action Leadership) programme and our Diversity Allies Scheme, to ensure that they provide meaningful delivery.

**d. Highlights of the E&I strand work completed since the previous update include:**

**1. Recruitment and onboarding**

- The Force has recruited 102 student constables year to date with the next intake due to join us on the 28<sup>th</sup> November which will see us having achieved our uplift target of 986 officers. This November intake currently has our highest number of students from underrepresented groups making up 53% of the cohort. We have also recruited 83 transferees with a further 14 confirmed to start in November and up to 15 planned to join us in December (depending on attrition). We have now closed our adverts for student constables and transferees and have a large pipeline which we will utilise for our future recruitment.

- The Outreach programme continues to attend events to promote recruitment for underrepresented groups in particular. Events have included the London Careers Fair, open days at Aviva, Southwark College careers events and continued social media campaigns.

## 2. Leadership and Culture

- The Commissioner has agreed the outline plan for CoLP's forthcoming series of internal E&I employee awareness events, these will be framed around *Inclusion* and *Compassionate Leadership* and will cover topic areas of Values, Ethics, Equity and Belonging.

These launch events will be held in November and December 2022 and will be mandatory for all Police Officers and Police Staff to support our roadmap to improve internal culture. Although the focus for these events will be on internal culture, future events will expand the inclusivity agenda to encompass our communities and stakeholders.

- The force's Data Bias Working Group met again in October 2022 to conclude its 12-month review on this subject. A proposal will be brought to the Force's next E&I Strategic Board for consideration and approval.
- Our Leadership & Organisational development (L&OD) team have now delivered the third module of the 2022 Positive Action Leadership Scheme (PALS) to seven employees from minority ethnic backgrounds. Topics covered to date have included presentation skills, values, feedback, networking skills, imposter syndrome and growth mindset. Feedback from the delegates has been extremely positive.
- The L&OD team are also working on a proposal for a Positive Action Programme for the Sergeants and Inspectors promotion process, this will be presented at the People Board.
- The College of Policing has recently announced that the senior Police National Assessment Centre and subsequent Strategic Command Course are being replaced by the Police Executive Leadership Programme. The aim is to ensure a more effective assessment and development approach for aspiring Chief Officers. There will be specific effort undertaken to identify, develop and support a pipeline of officers with the potential to become Chief Officers from minority and under-represented groups. Further details will be released by the College in December 2022.
- Friendly Ear Scheme: This is a new tool being developed to support student officers in their early career and improve the organisation's retention rates. As with many forces delivering on the police uplift, with an increase in numbers, the organisation has also experienced an increase in probationers exiting. The Scheme provides a confidential contact mechanism for student officers to discuss concerns with a more

experienced officer, thereby exploring supportive options for the officer to remain in the organisation. Appendix C provides fuller details on what the Scheme has to offer.

### **3. Community Engagement**

- The organisation has continued working with the successful Amazon Web Services (AWS) 'Schools Project'. This included meeting with a number of young people from different schools, colleges, youth groups and charities at Experience Haus studio on Saturday 24<sup>th</sup> September 2022 as a launch event. Working alongside the Metropolitan Police, the organisation will engage in a number of follow-up events sponsored by AWS.
- The Partnership and Prevention Hub<sup>1</sup> is looking to implement a Schools programme via an external provider to educate young people on current issues, provide visible reassurance in City schools, and improve relations with the Young Community. Procurement has commenced and benchmarking has begun, to identify when is best to launch the programme with maximum impact.
- As previously reported, the Force Volunteer Cadet Unit now has a cohort of 27 cadets (11 male, 16 female and 66% of those from Black and Minority Ethnic backgrounds). The Cadet Unit has continued to receive national attention regarding its work alongside officer and staff. Additionally, the cadets recently won the Annual National Cadets Competition for the best visiting team in First Aid at the National First Aid Competition. Subject to funding and staffing considerations, plans are being explored to expand the cadets in relation to age and numbers.
- Plans are underway to introduce a Youth Independent Advisory Group (YIAG). The aim of the YIAG is to act as a critical friend to CoLP, challenge conventional thinking and stimulate the viewpoints, ideas, experience, and skills of young people on current issues affecting policing. Young people will have an opportunity to review, challenge and develop policies and procedures that will impact upon young people and make improvements in service delivery. A paper is imminently due to be submitted around governance and implementation of the YIAG to the Force.
- The Strategic Research & Analysis Unit has 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 with the Census results later this year. This, along with our calendar of events and meetings, will be published on the internet.

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<sup>1</sup> The Partnership and Prevention Hub is focused on problem solving, reassurance and engagement. Hub Officers support Dedicated Ward Officers with specialised knowledge of crime prevention and community enforcement options to develop long-term problem solving approaches to high harm and volume crime priorities. The Hub develops community relationships and leads on Business Crime Reduction Partnerships at a tactical level.

#### **4. Health & Wellbeing**

- The key focus for this area remains on the mental health of our staff and developing our activity collectively within the force to improve it. In line with this, the following activity has been completed:
  - Mental Aid first aider training completed - 20 staff have been trained, which further supports the force ambition to look after the Mental Health (MH) of our staff.
  - PISP(Post Incident Support Procedure) structure established - 12 officers and supervisors are to be trained over a 2-day period , this is scheduled to commence in November.
  - MH courses for Supervisors launch in October.
  - Trauma Risk Management (TRiM) process and referral mechanism is being used and officer and staff signposted to this service.
  - L&OD have also launched MH courses for Supervisors, these went live in October.
- This quarter, in response to the national cost of living crisis, there has been a greater focus on financial wellbeing. Financial awareness training for employees was delivered with Police Mutual Assurance and the Police Federation who provided support and seminars outlining further tips and budgeting advice. The wellbeing page on the force intranet has also been refreshed with financial planning activities included on the site.

#### **5. Retention and Exiting the organisation**

- The working group has identified the need to ensure that there is an additional “retention conversation” as part of ‘business as usual’ line management. It is also recommended that there are at least two “retention conversations” within the notice period. This would also ensure that there is a two-tier data capture phase to better understand why people are leaving the organisation.
- Further work is being completed to improve support and advice to all levels of line management with the aim of improving the culture towards “retention conversations”. In particular, that people wanting to exit the organisation, to a degree should be anticipated, and therefore “retention conversations” should take place prior to this point.

#### **e. Diversity Workforce Data**

The Diversity Workforce data continues be presented to this Committee for oversight and scrutiny.

Please refer to Appendix D for full details.

## **f. Performance Measures**

The force has undertaken a review of how it measures progress and success against their E&I Strategy. Key Performance Indicators are aligned to the new Policing Plan 22-25. As part of the ongoing E&I Review, the KPIs will also be evaluated to ensure that they measure delivery for both national and local objectives.

Please refer to Appendix E for full details.

## **Conclusion**

- Appendix A – Highlight summary of progress made against the E&I Action Plan
- Appendix B – E&I Strategic Board Terms of Reference
- Appendix C – The Friendly Ear Scheme
- Appendix D – EDI Report Workforce Equality Data October 2022
- Appendix E - KPI Measures Table.

### **Contact:**

#### **T/Chief Supt Sanjay Andersen**

Professionalism and Trust

City of London Police

[Sanjay.andersen@cityoflondon.police.uk](mailto:Sanjay.andersen@cityoflondon.police.uk)

#### **Detective Chief Inspector Carly Humphreys**

Professionalism and Trust

City of London Police

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

#### **Kam Dhaliwal, Equality & Inclusion Manager**

Professionalism and Trust

City of London Police

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

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Workstream	Recruitment, Onboarding and L&OD	Owner	Director of HR	Date	11/10/22	Project RAG		Benefit RAG	
Workstream objectives				Priority					
<div>Page 29</div> <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>	Description					Date			
	Aspirational targets have been agreed by E&I board					Complete			
	Review our recruitment and attraction structure and people					Complete			
	Review promotion processes end to end					Ongoing			
	Cultural Workshop- Agreement next steps / outcomes					19 Jan 22			
	Reverse Mentoring - phase 2 continues					Ongoing			
	Community Engagement plan for PEQF					March 2022			
	PALs cohort 2 launched, 3rd module delivered with 4th scheduled for 2 November					Ongoing			
	Pilot of Mentivity Training #2					Feb 2022			
	Delivery of forcewide awareness programme on Values, Ethics, Equity, Belonging – 'Our People, Our Values'					June 2022			

Workstream	Health and Wellbeing	Owner	Inspection and improvement	Date	5/10/22	Project RAG		Benefit RAG	
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Workstream objectives	Priority Deliverables	
<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>09/21Complete and Ongoing as they are a separate unit they do receive training from their providers with diversity sand inclusion.</b></li> </ul>	Description	Date
	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 completed and refreshed yearly
	Oskar Kilo recommendations and planning	12/22
	60 MH first aiders to be trained and launched	12/22
	Launch Wellness Zone in Bishopsgate (COMPLETE)	11/21
	MH at work commitment MIND CHARITY and ongoing	06/22
Progress since last update	Key next steps	
<p>Page 30</p> <ul style="list-style-type: none"> <li>Continuation of the Better listening campaign programme. Over 200 officers and staff trained to date.</li> <li>Mental Aid first aider training completed 20 staff have been trained which further supports the force ambition to look after the MH of our staff .</li> <li>PISP structure established 12 officers and supervisors to be trained 2day course which is due to take place at the start of November</li> <li>HMICFRS consultation completed documents posted to HMICFRS awaiting inspection.</li> <li>Coffee MH wellbeing morning completed this is a bi -monthly activity.</li> <li>Financial awareness refreshed to help officers' staff within the city. In collaboration of partners such as Police Now , police Mutual etc</li> <li>Continued support for staff in fitness training and diet support</li> <li>MH courses for Supervisors launch in October</li> <li>.</li> </ul>	<ul style="list-style-type: none"> <li>To engage and identify why there is a delay with Nottingham Police reviewing our Oscar Kilo return</li> <li>Strategic lead to be interviewed by the HMICFRS regarding question 11 within the Force PEEL inspection.</li> <li>Await the launch of the staff survey and associated resulted of wellbeing within this survey.</li> <li>Paper to be presented at the Peoples Board as to whether the force will adopt the Suicide Prevention toolkit. Launched in September in consultation with the Samaritans , NPCC and Ok.</li> </ul>	

Workstream	Community Engagement	Owner	Ch Supt HQ	Date	07/10/2022	Project RAG		Benefit RAG		<a href="#">Key Performance Measures</a>		
<b>Workstream objectives</b> <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>				<b>Priority Deliverables</b>						<b>Police Community Encounters – Use of Powers</b> <b>1. Dip sampling of key police community encounters (stop and search / use of force / Road Traffic stops/ Firearms stops - internal senior officer dip sampling:</b> <ul style="list-style-type: none"><li><b>i. Number sampled past month</b></li><li><b>ii. Number identified with learning</b></li><li><b>iii. Number identified as best practice</b></li></ul> <b>2. IASG feedback on key police encounters stop and search / use of force / Road Traffic stops / firearms stops.</b> <ul style="list-style-type: none"><li><b>i. Number sampled / observed past month</b></li><li><b>ii. Number identified with learning</b></li><li><b>iii. Number identified as best practice</b></li></ul> <b>Community confidence / victim surveying measures</b> <b>1. Confident &amp; satisfied with City of London Police Actions</b> <b>2. Reducing the BAME &amp; Gender satisfaction gap in survey data</b>  <b>Number of community events attended</b> <b>1. Number of community events attended over the last month</b> <b>2. Outreach recruitment events expression of interest by ethnicity &amp; gender</b>		
				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>								
<div>Page 3</div> <ul style="list-style-type: none"><li>Met met with AWS Met Pol and other key stakeholders and agreed that the project will be run again with a potential launch of sept 22 after the success of the previous programme. Awaiting Corporation agreement and clarification of roles and responsibilities. There is a keen appetite for the programme and with is expanding now to include the Met partners.</li><li>The CoLP Volunteer Cadet Unit (VPC) now has a cohort of 27 cadets (11 male/16 female – 66% B.A.M.E) aged between 13-18 years old, and is gaining National attention/recognition working alongside officers and staff. The cadet unit has continued to receive National Recognition following the Annual National Competition at the end of July and have recently been awarded best visiting Team in the First Aid Competition. Subject to funding and staffing considerations there are plans being explored to expand the cadets with consideration to age and numbers.</li><li>Plans are underway to introduce a Youth Independent Advisory Group (YIAG). The aim of the YIAG is to act as a critical friend to CoLP, challenge conventional thinking and elicit the viewpoi8nts, idea's experience and skills of young people on current issues affecting policing. Young people will have an opportunity to review, challenge and develop policies and procedures that will impact upon young people and make improvements in service delivery. A paper is imminently due to be submitted around governance and implementation of the YIAG to the 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 with the Census results later this year. This along with our calendar of events and meetings will be published on the internet.</li><li>Cluster Panels- Continue to be attended and then chaired by DWO's and co-chair members. With comms support now required to increase attendance, publicise minutes, actions and issues rising. Publicise future events.</li><li>The Forces response to the NTE is currently being reviewed by Local Policing with plans to maximise visibility, provide reassurance and increase partnership working through activities such as Op Reframe (Welfare Hubs in Hot Spot locations).</li><li>PnP Hub looking to implement a Schools programme via an external provider to educate young people on current issues, provide visible reassurance in City schools and improve relations with the Young Community. Procurement has commenced and benchmarking has begun with when is best to launch and have the most impact.</li><li>An application for funding via the Home Office Safer Street Fund for a Crime Prevention Roadshow that will see officers visiting business premises in hotspot areas to offer crime prevention advice pertaining advice to our priority aquisitive crime types (bike marking, laptop marking, phone etching, counter terrorism awareness)</li><li>Outreach- Programme is continuing with attendance at the London Careers Fair, open evenings for our new August starters, Open Day at Aviva, Social media campaign and attendance to Southwark College to name but a few.</li><li>Summer Fete Day/Engagement event- Planned for 13/14<sup>th</sup> August 2022. Awaiting Chief Officer Team sign off and being lead by the CoLP Federation Rep.</li></ul>				<ul style="list-style-type: none"><li>Continue to map communities using latest available datasets (e.g. Census data - 2022) to accurately reflect the current picture within the City.</li><li>Plan to engage young people better through a structured schools programme/series of inputs linked to the PHSE curriculum, and raise awareness/offer diversion. Inputs could cover a whole range of issues and risks in line with CoLP vision/strategies, including ASB, violence against women and girls, and county lines.</li><li>Continue to develop Nextdoor membership (social media platform) to update residents on local policing activity. Now over 1500.</li><li>Launch mobile Digital Signage Screens Project, to display matters of public interest related to the prevention of crime in high footfall areas/Business footprints.- Awaits approval from Corporation Legal.</li><li>Increase cluster panel attendance through a comprehensive media strategy.</li></ul>								

Workstream	Leadership & Culture	Owner	Ch Supt AF/NFIB	Date	30/09/22	Project RAG		Benefit RAG	TBD
Workstream objectives				Priority Deliverables					
<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>				Key Deliverable / Key Performance Indicator					Target Date
				Launch mandatory Values, Standards and Ethics sessions (now framed <i>under Inclusion and Compassionate Leadership</i> )					Q3/22
				KPI: 100% of <u>eligible</u> and <u>available</u> staff have attended one of the mandatory inputs					03/23
				Develop an E&I secondment framework for leaders / volunteers					Q1 23
				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
				Complete a data bias review and recommendations					11/22
				Introduce an annual E&I award as part of future event					03/23
				Further develop Diversity Allies Scheme					Q1 2023
Progress since last update				Key next steps					
<ul style="list-style-type: none"><li>Commissioner McLaren has agreed the outline plan for CoLP’s forthcoming series of internal E&amp;I staff awareness inputs (framed around <i>Inclusion and Compassionate Leadership</i>).</li><li>As reported in previous updates, these launch / gateway events will be held in November, consisting of 4 x half-day sessions hosted at the Aviva building. All police officers / police staff will be invited, and the focus will be CoLP’s internal culture. Future inputs / events / activities will expand the inclusivity agenda to encompass CoLP’s communities and stakeholders.</li><li>The force’s data bias working group met again in October to conclude its year-long review of this subject. Proposals will be brought to the November E&amp;I Strategic Board for consideration and approval.</li></ul>				<ul style="list-style-type: none"><li>Finalise the content for November’s all-staff events.</li><li>Review CoLP’s existing external secondment process and look at opportunities for both short and long-term secondments (developing leadership skills).</li><li>Formalise data bias work within the existing force governance structure - including the integration of the NPCC’s <i>Data Literacy Framework</i>.</li><li>Finalise the plan for CoLP’s annual E&amp;I award.</li></ul>					

Workstream	Retention and Exiting	Owner	T/DCS Bradford	Date	07/10/22	Project RAG		Benefit RAG	
Workstream objectives				Priority Deliverables					
<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> 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>				Description					Date
				Agree a new process map for our exiting employee journey					01/11/22
				Draw best practice and academic research on the topic of retention and exit interviews					01/11/22
				Seek additions/alteration to HR held SOP					01/12/22
				Implement the cultural change for adding retention conversations to BAU					01/01/23
Progress since last update				Key next steps					
<p>Progress update has seen continued support to the strand lead and cooperation from Kam, HR and the SSN’s and SSA’s. I have identified four key work strands needed to deliver change/improvement.</p> <p><b>Work strand 1 – The identification and recording of data use.</b></p> <p>We need to baseline how the HR data from exit interviews should be used <i>in theory</i> versus our experiences in day-to-day process. The two workshops undertaken to date have drawn out initial discussions. It is noted that the recent change of the sharing and use of EI data transferring from Performance Board to People Board is expected to improve the opportunity to learn from this data.</p> <p><b>Work strand 2 – A review and agreement of the Exit Interview process.</b></p> <p>In 2021 (estimate) a swim-lane process map was devised and saved as the “to be” process. Drafted by David Cleverley and HR SMT, this sought to improve the EI process but there does not appear to have been wider consultation or sign-off.</p> <p>A new (draft) process has been mapped out with an accompanying narrative with a view to have further consultation later in autumn 2022.</p> <p>In precis, this adds a "retention conversation" as part of BAU line-management, at least two "retention conversations" within the notice period and suggests a two-tier data capture phase within the notice period and greater responsibility for line managers.</p> <p><b>Work strand 3 – Exit interview questions.</b></p> <p>It is unknown when the last review of the EI questions was undertaken. DCI Lee Parish is supporting this strand and working with HR to review and to consider the implementation of the two-tier data capture.</p> <p><b>Work strand 4 – Retention conversations.</b></p> <p>Linked to work-strand 2, improved support and advice to all levels of line management are needed to improve the culture towards “retention conversations”. They should be had in advance of someone getting to the point where they’ve made the decision to leave the organisation.</p>				<ul style="list-style-type: none"><li>Reconvene the working group to consult and agree the new process map.</li><li>Consult on how to implement a cultural change for retention conversations in BAU line management.</li><li>Complete the research with “other” forces to seek existing good practice on a toolkit for greater line manger training for retention conversation and exit interviews.</li><li>Consider the College of Police, HO and NPCC report on research into recent "police leavers"</li></ul>					

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# **EQUALITY & INCLUSION STRATEGIC BOARD TERMS OF REFERENCE**

## **Reference Information**

<b>Responsibilities</b>	
Name of Terms of Reference Author:	
Unit or Department:	Professionalism & Trust
Directorate owning this document:	Corporate Services
Meeting Chair:	Commissioner
<b>Version control</b>	
Date of latest version:	V1 September 2022

# 1. CONFIGURATION DATA

## Section A - Document Location

This document is only valid on the day it was printed.  
The source of the document will be found within City-i at: TBC

### A.1 Revision History

**Date of this revision:** Implemented in September 2022

**Date of Next revision:** September 2024

Revision date	Previous revision date	Summary of Changes
May 2022	N/A	Changes to the Chief Officer Team, Forces vision, values, priorities, practices and processes.

### A.2 Approvals

This document requires the following approvals.

Name	Title	Date of Issue	Version
	Commissioner	September 2022	1.0

#### A.2.1 Distribution

This document has been distributed to:

Name	Title	Date of Issue	Version
IASG	(Chair)	September 2022	V3
Police Authority Board	(Tackling Racism Taskforce)	September 2022	V3
Police Authority Board	TBC (Equality SIA Lead)		

#### A.2.2 Vetting Level Required at Meeting

All members must be vetted to the appropriate vetting level to perform their role. If a person is waiting on vetting clearance, the person must inform the Professionalism lead of this fact to ensure no security breaches take place. Any visitors who are invited to the meeting to present a specialist subject matter, should only be allowed to attend the meeting when their subject matter is on the agenda. Such matters should ideally be listed as one of the first Agenda items, to enable to person(s) to address the board and leave the meeting, thus causing as little disruption to the meeting.

**This meeting requires attendees to be vetted at the following clearance level:**

All Police Authority Board members clearance level = TBC

All Independent Advisory Scrutiny Group (IASG) members clearance level = NPPV2

Visitors = PNC

#### A.2.3 Meeting acronyms

## **NOT PROTECTIVELY MARKED**

**EDI** – Equality, Diversity & Inclusion

**EDIE** – Equality, Diversity, Inclusion & Equity

**PSED** – Public Sector Equality Duty

**GPGD** – Gender Pay Gap Data

**Gold Group** – Critical Incident Management meeting

**AOJ** – Administration of Justice

**NPCC** – National Police Chiefs Council

**PSD** – Professional Standards Department

**IASG** – Independent Advisory Scrutiny Group

**PPU** – Public Protection Unit

**SSN** – Staff Support Networks.

**ECD** – Economic Crime Directorate

**SPOC** – Specific Person of Contact

**PIPCU** – Police Intellectual Property Crime Unit

**LGBT+** - Lesbian, Gay, Bisexual and Transgender and the '+' symbol recognises other identities which do not fall into these categories such as queer, questioning, non-binary, intersex and gender-fluid.

**EIA** – Equality Impact Assessment

**DCPCU** – Dedicated Card and Payment Crime Unit

**GDPR** – General Data Protection Regulation

**IFED** – Insurance Fraud Enforcement Department

**BUSSS** – Best Use of Stop and Search Scheme

**AC** – Assistant Commissioner

**CT** – Counter Terrorism

**HMICFRS** – Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services

**SOP** – Standard Operating Procedures

## **STATEMENT OF MEETING PURPOSE**

The following statement outlines the purpose of this meeting:

The Equality and Inclusion Strategic Board meeting monitor's the Force's performance in relation to equality and diversity in all areas of policing and within its workforce. This means monitoring how the Force delivers its policing services in a way that is fair, transparent, and sensitive to the needs of different communities, groups and individuals. It also means monitoring the Force's performance in creating an inclusive and diverse organisation where progression, equal opportunity, dignity and respect is maintained irrespective of their personal characteristics, and where all Forces employees can fully contribute, develop and flourish at work, irrespective of their personal characteristics.

## **2. MEETING OVERVIEW**

The Force is committed to promoting equality and diversity of thought, approach and leadership styles, recognising that inclusion, culture and undisclosed or invisible diversity (such as class, politics, background, experiences) add to the wellbeing of the organisation services provide to the public.

The Strategic Board aims to ensure the Force meets all of its legal responsibilities and commitments to equality, diversity, inclusion and equity, through the Equality Strategy and supporting Action Plans. The Board will measure the progression of all the Forces Equality, Diversity and Inclusion (EDI) Action Plans to ensure it is progressing against milestones and is regularly updated to reflect any national / local learning, National Police Chiefs' Council recommendations, government recommendations, workforce surveys, community feedback and academic research. The Board aims to:

- Ensure the Forces Vision, Values, Organisational priorities and Operational priorities are embedded in all EDI activities and Action Plans.
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.
- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

### 3. ATTENDEE LIST

This meeting should be attended by the following individuals: The meeting is to be attended by the heads of departments, HR representatives, Equality, Diversity & Inclusion (EDI) Strand Leads or representatives, Communications Manager, Equality Police Authority Board Representative, City of London Corporation E&I Manager, Independent Advisory Scrutiny Group, Police Federation, and Trade Union representatives; this list is not exhaustive.

Post Name	Responsibility/ Representation	Nominated Second
Commissioner		
Vice Chair		
Executive Assistant to Commissioner		
E&I Manager		
Head of Professionalism & Trust		
<b>EDI Action Plan Strand Leads</b>		
EDI Strand Health & Wellbeing		
EDI Strand Leadership, Culture & L&OD		
EDI Strand Community Engagement		
EDI Strand Recruitment, Onboarding, Retention & Exiting		
<b>Specialist Departments</b>		
Programme Manager		
Chief Operating Officer		
Director of HR		
Corporate Communications Representative		
L&OD Lead		
Director of Business Finance		
Head of Strategic Development		
<b>Diversity Champions</b>		
Age Champion		
Disability Champion		
Race Champion		
Gender Champion		
Religion & Belief Champion		
LGBT+ Champion		
Health & Well-Being Champion		
HeforShe		
<b>Trade Unions &amp; Police Federations</b>		
Unite		

## NOT PROTECTIVELY MARKED

GMB		
Police Federation		
Police Superintendents Association		
<b>External Members</b>		
Police Authority		
Police Committee Authority Tackling Racism Taskforce Chair		
Independent Advisory Scrutiny Group Lead		
Corporation Equality Lead		

### 4. MEETING RESPONSIBILITIES

The meeting will be chaired by the Commissioner, who is the most senior ranking officer in the Force and who will be the final decision maker. The minutes and actions will be recorded by the Commissioners Executive Assistant. The papers for this meeting will be prepared by the Forces E&I Manager.

**National updates:** Officers and staff engaging and working with NPCC national leads will provide the board with any national guidance and recommendations. The updates will allow the board to understand the national picture and how it impacts any local policies, action plans and activities. It is recommended that the updates are provided in writing to the board, to allow members to read any updates prior to attendance. This will allow more time to ask and answer any questions, and allow the board to manage its time in an effective manner.

**Local updates:** The updates will reflect how the force is complying with any Equality legal requirements, any legislative changes, performance under the Public Sector Equality Duty, stakeholder collaboration, Government recommendations, and any changes to how the force manages and oversees its policies, practices and activities. The updates will also reflect how the force is sharing and promoting the EDI activities taking place and any future communications. It is recommended that the updates are provided in writing to the board, to allow members to read any updates prior to attendance. This will allow more time to ask and answer any questions, and allow the board to manage its time in an effective manner.

**EDI Strand Lead Dashboard:** This board will be provided with a dashboard of each EDI strand area only, because the E&I Operational Delivery Board will have had oversight and scrutiny of how the EDI action plans have progressed. The Dashboards will be in the board papers, which will be provided to members in advance, to allow members to read any updates prior to attendance. This will allow members more time to ask and answer any questions, and allow the board to manage its time in an effective manner.

The members will be accountable for their business areas. The responsibilities remain with the leads and attendance is mandated unless they are unable to attend. Each Board member will nominate a member of their team to attend the Board meetings on their behalf. The person nominated must be of Chief Inspector or staff equivalent grade, they must be fully briefed on all equality matters, to enable them to effectively contribute to discussions and strategic decisions being made. The nominated person will represent the required member when they cannot attend. Nominated staff and officers cannot be held responsible for the business area they are representing because that responsibility remains with the business area lead.

## **5. MEETING OBJECTIVES**

This meeting sits with the purpose of delivering the following objectives:

- To set the equality strategic direction and ensure the Force meets its statutory responsibilities under the Equality Act 2010, and to monitor the Force's response to this legislation.
- To provide governance and scrutiny of the strategic direction and to shape the objectives.
- To support and advise on the implementation and progress of the Equality objectives with its associated actions and standards.
- To review and monitor delivery of the Equality objectives and to hold leaders to account for its progression.
- To consider and advise on the equality and diversity implications of major policy proposals and initiatives.
- To consider areas of equality and diversity where new or improved performance monitoring is required.
- To coordinate action on issues arising from relevant reviews e.g. Macpherson's report, HMICFRS recommendations, National Police Actions Plans (Race & VAWG), Inclusive Britain, etc.
- To identify risks and issues and ensure that these are acted upon.
- To act as a champion for diversity and equality issues within the Force and to provide support for those taking forward this agenda, whilst acting to address organisational inhibitors.
- To engage internal and external stakeholders in shaping the agenda and provide an opportunity for challenge.
- Identifying and sharing best practice around equality and diversity across the service. To look outward at best practice in industry.
- To oversee the design, implementation and periodic review of the Force's equality objectives (at least every 4 years), to review and if necessary, prioritise action plans to reflect National Police Chief's Council recommendations, Government recommendations and the aims of the PSED.
- The Force will implement an Equality Strategy and an EDI Action Plan, which will take into consideration:
  - Legislation
  - Workforce Representation requirements
  - National Police Chief Councils recommendations
  - College of Policing recommendations
  - Positive Action Plans & Strategies
  - Equality, Diversity and Inclusion strategy
  - Staff surveys
  - Community surveys

## **NOT PROTECTIVELY MARKED**

- Equality Impact Assessments
- HMICFRS recommendations
- Equality and Human Rights Commission guidelines and codes of practice.

## 6. MEETING AGENDA ITEMS

The meeting will provide oversight into the Equality and Inclusion areas of the Force, following the set agenda below:

	Agenda Item  Standing Item  Non-Standing Item	Update method  Paper/ Verbal /  Presentation & Qs – Page No:	Agenda  Speaker/Owner &	Boards Expectation  For Decision / Update / Info  Time allocation
1.	Welcome & Apologies	Verbal – Page X		Information – X mins
2.	Previous Minutes (accuracy and approval)	Paper – Page X		Information & Update – X mins
3.	Actions	Paper & Verbal – Page X		Information & Update – X mins
Section time Total: minutes				
4	<b>National Updates</b>  Equality, Diversity, Inclusion & Equity.  Race Action Plan  Violence Against Women & Girls (VAWG)	Paper & Verbal – Page X  Paper & Verbal – Page X  Paper & Verbal – Page X		Information – X mins  Information – X mins  Information – X mins
5.	<b>Local Updates</b>  Legislative, Policy & Stakeholder collaboration  Communications  Any other emerging trends/areas	Paper & Verbal – Page X  Paper & Verbal – Page X  Paper & Verbal – Page X		Information – X mins  Information – X mins  Information – X mins
Section time Total: minutes				
6.	<b>EDI Strand Workstream Updates</b>  Recruitment, Onboarding & L&OD  Health and Wellbeing	Paper & Verbal – Page X  Paper & Verbal – Page X		Information – X mins  Information – X mins

## NOT PROTECTIVELY MARKED

	Community Engagement	Paper & Verbal – Page X		Information – X mins
	Leadership and Culture	Paper & Verbal – Page X		Information – X mins
	Retention and exiting the organisation	Paper & Verbal – Page X		Information – X mins
Section time Total: X minutes				
9.	<b>Unions &amp; Police Federation</b>			
	Unite	Paper & Verbal – Page X		Information – X mins
	GMB	Paper & Verbal – Page X		Information – X mins
	Police Superintendents Association	Paper & Verbal – Page X		Information – X mins
	Police Federation	Paper & Verbal – Page X		Information – X mins
Section time Total: X minutes				
10.	AOB	All – Page X	All	Information – X mins
Meeting close: Total Time expected: X hour & X mins				

## 7. MEETING FREQUENCY

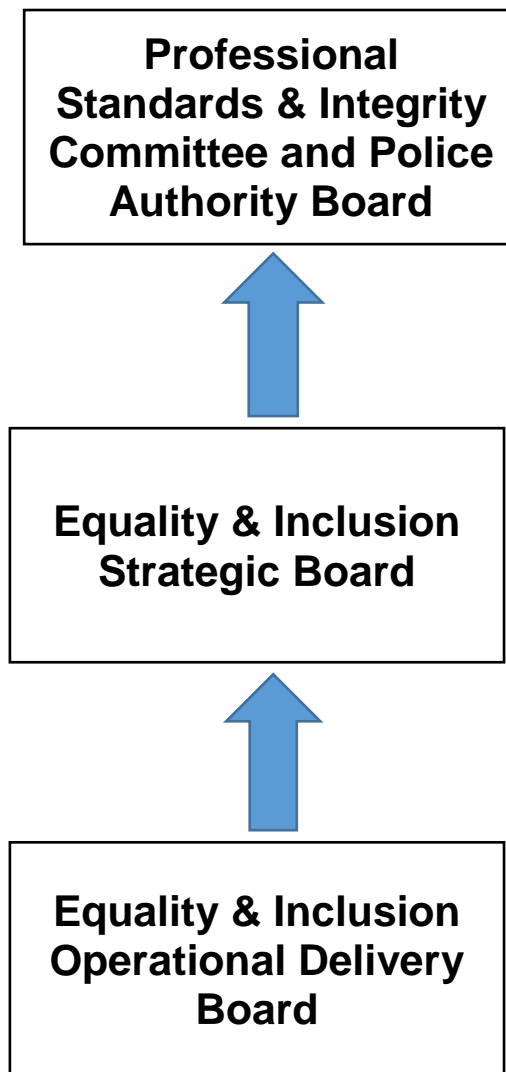
This meeting will convene on a quarterly basis or more frequently if required. All documents and agendas should be distributed to the Chairs approximately two weeks before the meeting, to allow the Chairs to review all actions and updates. Two weeks before the scheduled meeting date, all Board members are to provide an update on their actions and responsibilities to the minute taker and Equality & Inclusion Manager. The Equality & Inclusion Operational Delivery Board meeting will be held at least 2-4 weeks before the E&I Strategic Board meeting.

## 8. MEETING REPORTS

<b>Legal Responsibilities &amp; Returns</b>	<b>Owner &amp; Due date</b>	<b>Update on Report/Plan</b>
Public Sector Equality Report (PSED) - Annually	HR by 30 <sup>th</sup> March every year & review of objectives every four years.	Published on Forces website.
Gender Pay Gap (for Police Officers only as Staff are included in the Corporations return) - Annually	Payroll Manager, 30 <sup>th</sup> March every year.	To be published on Gov.UK website and Forces external website.
Equality Impact Assessments (EIAs)	All SOP owners – reviews to be conducted when the SOP expires and the E&I manager signs the EIA off.	Some SOPs are to be published on the external website.
<b>Non-Legal Report / Action Plan</b>	<b>Owner</b>	<b>Update on the Report/Plan</b>
Equality Police Authority Board quarterly report	Equality & Inclusion Manager	Due every quarter in report form.
EDI Action Plan	Professionalism Team – This is a live document	Due every quarter to establish progress against milestones and what support is needed to deliver all the EDI activities.
RACE Action Plan	Professionalism Team – This is a live document	Updates to be provided to the Board.
VAWG Action Plan	Professionalism Team – This is a live document	Updates to be provided to the Board.
Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) Peel Reviews & Actions	Professionalism Team – this varies depending on the PEEL review & recommendations	Updates to be provided to the Board.
<b>National Updates</b>	<b>Owner</b>	<b>Update on the Report / Plan</b>
National trends	Communications Manager & E&I Manager	To influence any EDI activities / Action Plans

## 9. REPORTING CHAIN

This meeting is linked to other Force meetings providing them with information and reports as detailed below:





Student Officer Training



# The Friendly Ear Scheme





# Student Officer Training



## The Friendly Ear Scheme – Student Retention Programme

### Briefing Note October 2022

#### Background

The City of London Police was officially created in 1839, it covers the very heart of London known as 'the square mile' and currently consists of almost 1,500 Police Officers and Support Staff. It is the smallest territorial police force in England but is the world's leading international financial and business centre.

The City of London area has a resident population of around just 9,000 but there is also a daily influx of approximately 400,000 commuters- from an estimated 200 different cultures and nationalities. There are also upwards of 19 million tourists visiting each year. It is home to one of the richest and most diverse concentrations of arts and festivals in the UK and some of the world's most famous historic buildings, bridges and monuments are here. There are also around 24,000 businesses and 850 licensed premises, each presenting us with their own unique challenges.

Due to the Home Office National Police Uplift Programme to introduce 20,000 new police officers across England and Wales by end of March 2023, CoLP will be recruiting its highest ever number of new student officers from August 2022. The CoLP Learning & Organisational Development (L&OD) team are aware anecdotally that in recent years student officer turnover has increased and currently sits at over 20%. In light of the significant increase in new student officers joining CoLP and a genuine desire to retain these new officers in force and support their long term careers in CoLP, the L&OD team have developed The Friendly Ear Scheme. The scheme has three main elements:

1. **Support & Contact** - a confidential contact mechanism for student officers to approach and discuss concerns with an experienced officer prior to resigning with the aim to support the student officer to remain in force, collect data/trends and, where necessary, conduct a full exit interview should the student officer decide to leave. Anonymised findings will feed into the Force's Organisational Learning Forum.
2. **Data Analytics** – use of past student officer data to develop a Student Officer Flight Risk Model to a) identify key variables that contribute to Student Officer turnover with the intention that the Force can address these factors and b) a predictive ability to identify Student Officers with a high probability of leaving to allow for proactive, bespoke intervention.
3. **Career Coaching Pilot** – pilot career development programme with follow-up career planning coaching sessions. Based on suggestions from the student officers, a programme of informal talks known as the Spotlight Sessions are being planned to highlight to new students what careers are available in force. Once the Spotlight Sessions have concluded the Student Officers will be invited to a coaching session with The Friendly Ear Scheme who will facilitate a coaching style conversation with the Student Officer to develop a career development plan with the Student Officer specific to their aspirations.



# Student Officer Training



## Evaluation Metrics

The success of the three elements of The Friendly Ear Scheme will be measured by the following qualitative and quantitative criteria:

- 100% of all referrals to the scheme (self, manager or other) to be responded to within 48 hours
- A higher retention rate amongst student officers who approach the scheme than those who do not approach the scheme
- Exit interviews for 100% of student officers who do leave the force
- Flight Risk Predictive Model to be run for each new student officer intake with referrals made to the scheme where necessary
- For 100% of student officers who request a career coaching session to receive one
- Positive qualitative feedback on Spotlight Sessions

All the above measures to be reported on quarterly and shared to key leadership teams i.e. L&OD, PSD, Local Policing, Uplift Programme. First report due December 2022.

## Progress/Milestones

**Launch** – the scheme launched in August 2022 ahead of our first Year 3 Uplift student officers joining the force. Briefings were given to each intake as part of their induction with flyers included in training packs and during pre-boarding open evenings. Briefings were also given to the Local Policing Inspectors to ensure their buy-in and awareness of the scheme once the student officers leave the classroom. Recruitment of more CoLP officers to support the scheme has successfully yielded a further 6 officers who will act as 'friendly ears', they come from a range of diverse backgrounds.

**Data Analytics** – the data analytics element of the scheme launched in June/July 2022 in partnership with a consultancy firm, Applied Data Science Partners, following a short procurement exercise. The data analytics project took place over a 4 week period with a presentation of findings in August 2022. Statistically significant key findings were:

- Students are significantly more likely to leave during probation if the cohort size is greater than 12 students (15%)
- Classroom dropout (first 4-6 months) is significantly smaller when students are in cohorts of 12 or fewer
- Students who start in Spring / Summer are more likely to leave in probation (12%) than students who start in Autumn/ Winter (7%)
- Students aged 30+ are significantly more likely to leave during probation (17%).

Flight risk prediction data for the first four student officer intakes has been processed and shared with L&OD Supervisors including the Friendly Ear Scheme leads to ensure appropriate support is in place for 'high risk students' via tutorials, referring to the scheme, etc.

**Career Coaching** – the 'Spotlight Sessions' programme is being planned currently and is due to commence between November and end of February. Career coaching sessions will then be offered from March 2023 onwards once a Level 3 Coaching & Mentoring qualification has been obtained by



# Student Officer Training



two of The Friendly Ear leads (thanks to funding from the National Uplift Programme) and a Train the Trainer coaching skills package developed and rolled out to the other Friendly Ear officers. The career coaching sessions will be complemented by a range of curated resources and templates for the Student Officers with follow-up support also offered.

## Timeline of progress to date

July 2022

- data analytics consultancy partnership established
- data analytics project commences

August 2022

- The Friendly Ear Scheme is officially launched with briefings and advertising material distributed to students and response group Inspectors
- findings of data analytics project reported back and Flight Risk Prediction Tool launched
- recruitment of more officers to scheme

September/  
October 2022

- career development programme - topic scoping
- successful bid for funding from National Uplift Programme for coaching qualification
- Flight Risk Prediction Data produced for current student officer intakes



# Student Officer Training



## Future Activity

**November/  
December 2022**

- source and commence Level 3 Coaching & Mentoring Award (3 months)
- launch of 'Spotlight Sessions' programme
- first quarterly evaluation report of the scheme produced

**January/  
February 2023**

- 'Spotlight Sessions' programme continues
- career coaching materials/resources scoped and produced
- Train the Trainer career coaching package developed and rolled out

**March 2023**

- career coaching sessions commence
- second quarterly evaluation report of the scheme produced
- review of scheme and planning for next 12 months

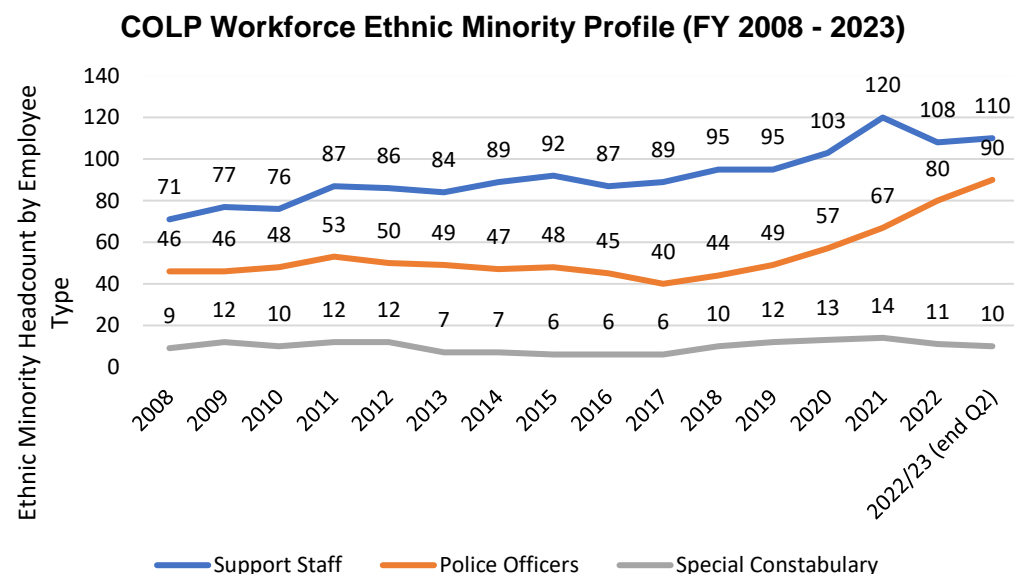
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## Appendix D: EDI Report Workforce Equality Data October 2022

### Force Demographics

- The CoLP ended quarter 2 (Q2) of 2022/23 with an Officer headcount of 970 (increase from 869 at 30 June 2022), and Staff headcount of 480.

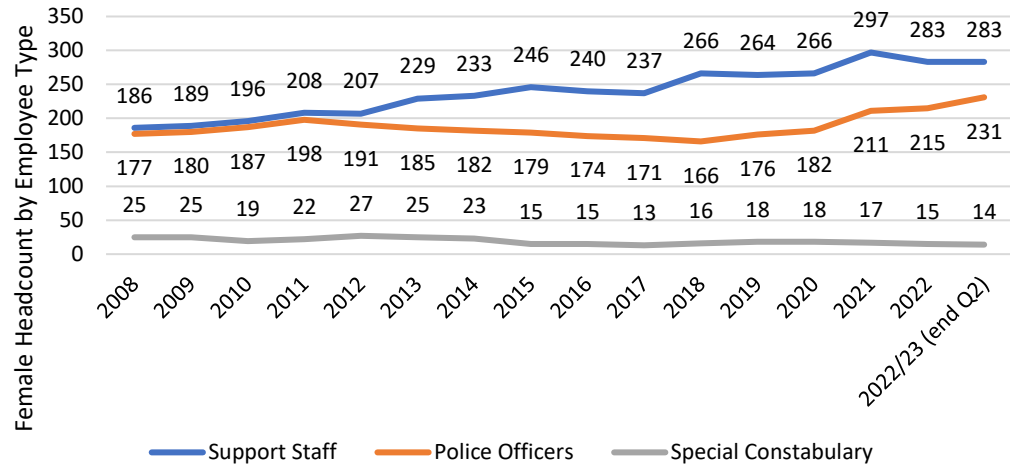
The graph below represents the number of Ethnic Minority Police Staff, Officers, and Special Constabulary within the CoLP at the end of each financial year from 2007/8 to 2021/22 and the first 6 months of 2022/23 (2022/23 end Q2).



### Ethnicity

- For the reporting period (1 July 2022 to 30 September 2022), the number of Ethnic Minority (excluding white minority) Officers has increased from 78 to 90, which is 9.3% of the total Officer headcount. The increase is likely due to the diversity in Student Officer and ROCUs seconded from other forces around the country. The number of Ethnic Minority (excluding white minorities) Police Staff has remained at 110 since June 2022, which is 22.9% of the total Staff headcount.
- When compared nationally, CoLP Staff Ethnic Minority representation rate is currently ranked second highest among all national forces (excluding BTP) and is sixth highest for Officer representation (excluding BTP).
- The force's Equality & Inclusion Operational Board oversees the work on the NPCC plan. The force continues to use innovative advertising and attraction campaigns, support internal applicants through application writing and interview workshops and use a buddy system where Ethnic Minority officers are supported by a buddy when they join the force.

**CoLP Female Workforce Profile (FY 2008 - 2023)**

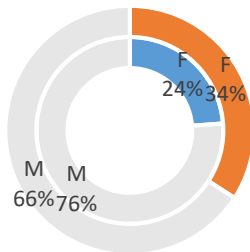


## Gender

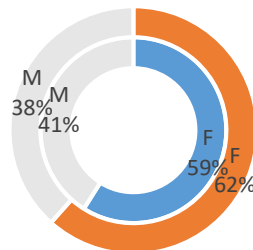
- During the reporting period, the number of female Police Officers has increased from 215 in June 2022 to 231 in September 2022. At the end of September, the percentage of female Police Officers stands at 23.8% of the total Office headcount. 22.6% of 115 Officer joiners were female in the reporting period.
- The number of female Police Staff has remained the same at 283, as a percentage this means 59% of Staff are female.
- In 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 to support flexible working. 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

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

**Officers Gender Profile**



**Staff Gender Profile**





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## Appendix E – KPI Measures Table (October 2022 update)

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>

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## Professional Standards and Integrity Report Nov 2022

<b>Committee(s):</b> Professional Standards and Integrity	<b>Dated:</b> 29112022
<b>Subject:</b> Action Fraud Statistics – Quarter 2 – 1 <sup>st</sup> July 2022 – 30th Sept 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>	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	<b>For Information</b>
<b>Report author:</b> A/Det Supt Claire Cresswell / 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 second quarter of 2022/23 (July to Sept).

<b>Data</b>	<p>Following changes to the Misconduct Regulations there are now two full data set years for comparative data. All logged complaints include all dissatisfaction.</p> <p>Action Fraud data is referred to in the overall figures reported in the main PSI report 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 93 in Q2. This is a decrease against the previous quarter (16%) and below average against the previous 5 quarters.</p> <p>The complaints are broken down as 11 logged under Schedule 3, and 82 not within Schedule 3.</p>

## Professional Standards and Integrity Report Nov 2022

	<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 Q2 of the 2022/23 financial year Action Fraud (AF) recorded 126,556 reports on the National Fraud Database consisting of 87,271 crime reports and 39,285 Information reports. The complaint figures (total) represent 0.007% of the total number of Action Fraud reports recorded in Q2.</p>
<b>Nature of Allegations</b>	<p>Of the 90 allegations recorded during Q2 2022/23 the highest number was in the category of, A1 – Police action following contact (61) followed by followed by A3 – Information (10) and A4 – General level of Service (9)</p>

## Professional Standards and Integrity Report Nov 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>	<p>The total number of allegations finalised during Q2 is 101 compared to 66 in the previous quarter.</p> <p>Cases often contain more than one allegation; the number of cases finalised in Q2 is 92. 83 outside of Schedule 3 and 9 Schedule 3.</p>
<b>IOPC Reports</b>	The IOPC has published the second annual complaint bulletin in the new format following the amendments to the Police Conduct Regulations. The IOPC new quarterly bulletin's in the same format are being finalised and not yet ready for external publication. 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 Nov 2022

### **Content**

#### **Part A – Complaint Cases and Allegations**

Table 1 - Quarterly comparisons for Complaint Cases

Table 2 - Quarterly comparisons for Allegations

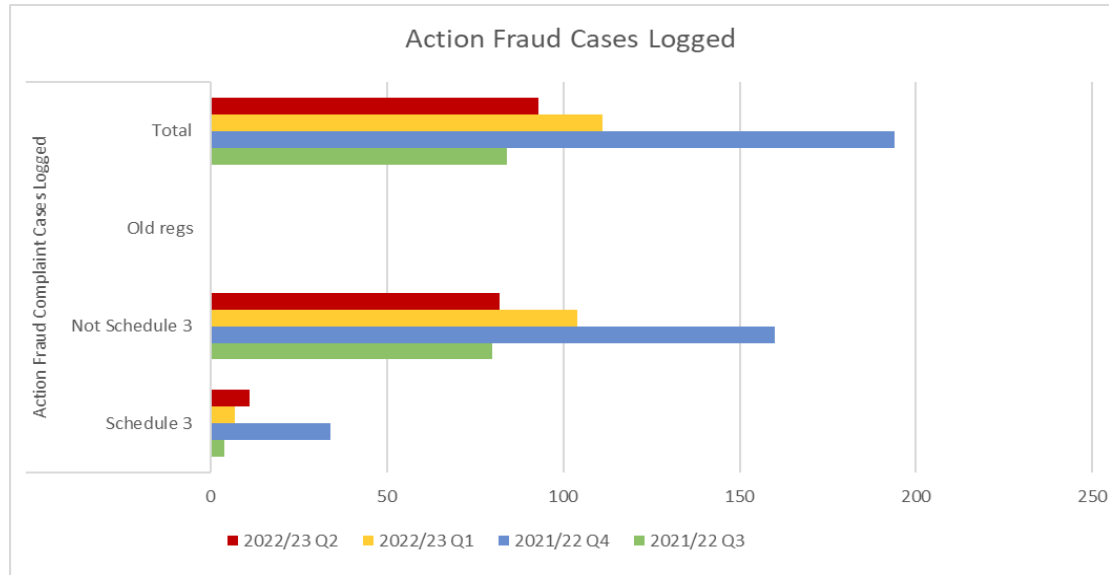
Table 3 – Quarterly comparisons for Allegations Finalised

#### **Part B - Appeals**

#### **Part C – IOPC**

#### **Part D – Learning**

## Professional Standards and Integrity Report Nov 2022

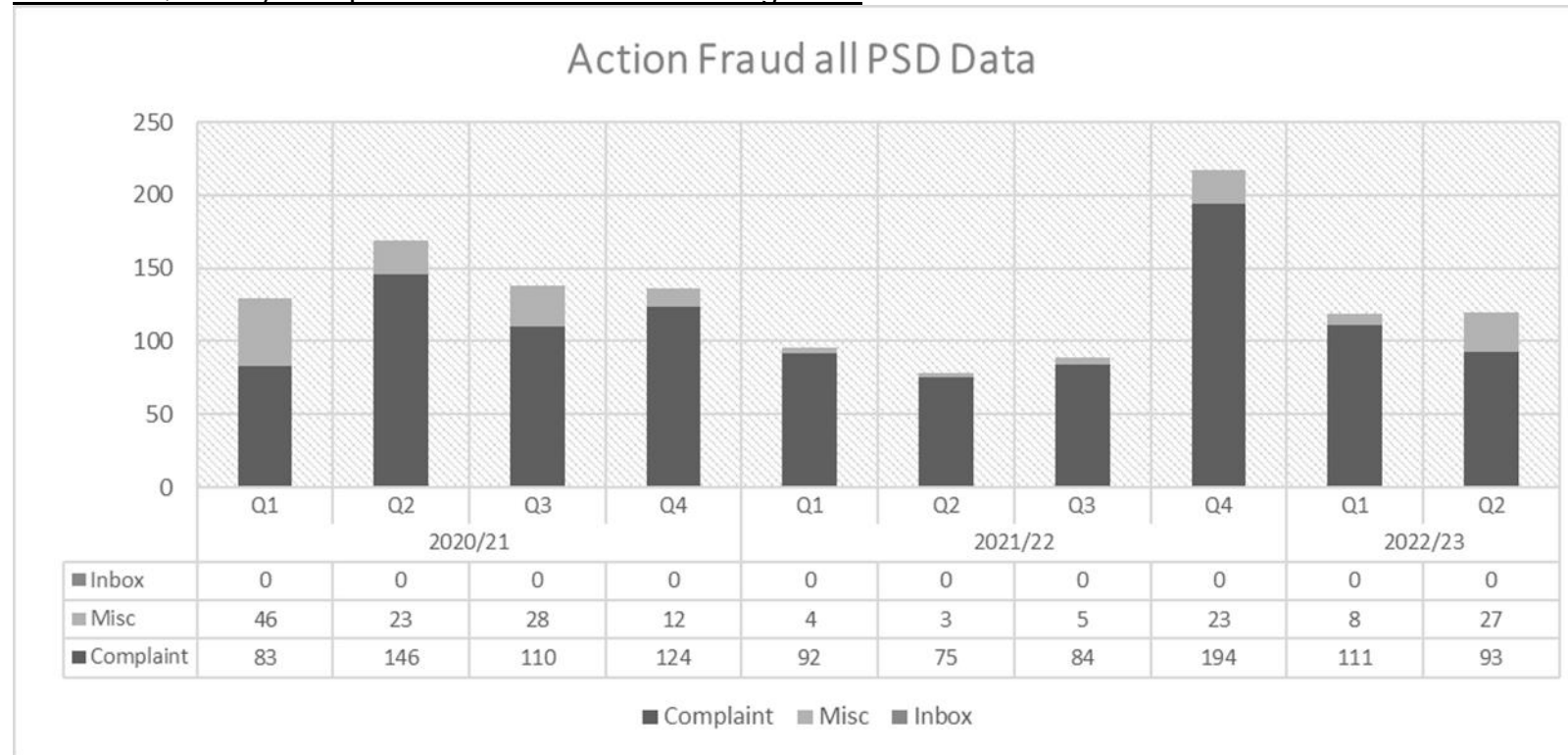
**Part A – Complaints & Allegations****Table 1 - Quarterly Comparisons for Action Fraud Complaint Cases**

- In Q2 of the 2022/23 financial year Action Fraud (AF) recorded 126,556 reports on the National Fraud Database consisting of 87,271 crime reports and 39,285 Information reports.
- The complaint figures (total) represent 0.007% of the total number of Action Fraud reports recorded in Q2.

- The number of Action Fraud complaints logged in Q2 2022/23 is 93 which is a decrease of 18 (16%) from the previous quarter. (see below re Q4 data collection anomaly).
- 82 of these complaints fell outside of Schedule 3, 11 were within Schedule 3.
- 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. Q4 absorbed some backlog and increased data for this period.
- Since Q1 2022/23 PSD have been trying to obtain access to AF's system in order to extract complaint data directly but there are ongoing issues with this. Due to the external demand placed on the AF team and PSD access to data issues, PSD aren't being provided with the data, therefore some complaint data is not logged. Once the issues have been resolved PSD can recommence logging these AF complaints again.
- 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.

## Professional Standards and Integrity Report Nov 2022

Table 2 - Quarterly Comparisons for Action Fraud Allegations



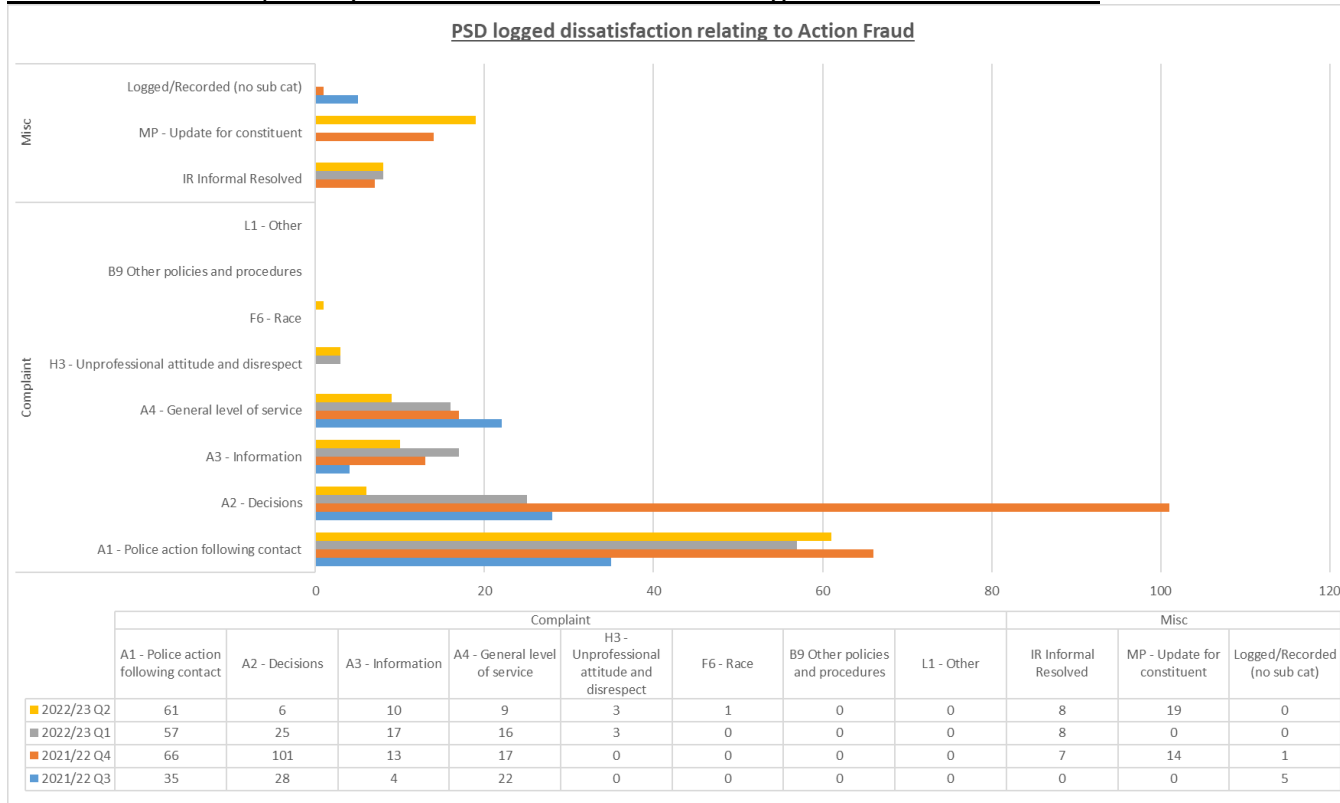
The vast majority of Action Fraud complaints cite a lack of response or investigation. Prior to changes to the Police Regulations these were usually resolved informally through service recovery by providing an update/explanation to the complainant and a swift resolution. ALL expressions of dissatisfaction 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 are reflected in the IOPC bulletins now 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 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. Q2 compared against previous quarters is lower than average against the previous 5 quarters, although some data is likely unlogged.

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 Nov 2022

Table 2 - Quarterly Comparisons for Action Fraud Allegations Recorded – Q2

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.

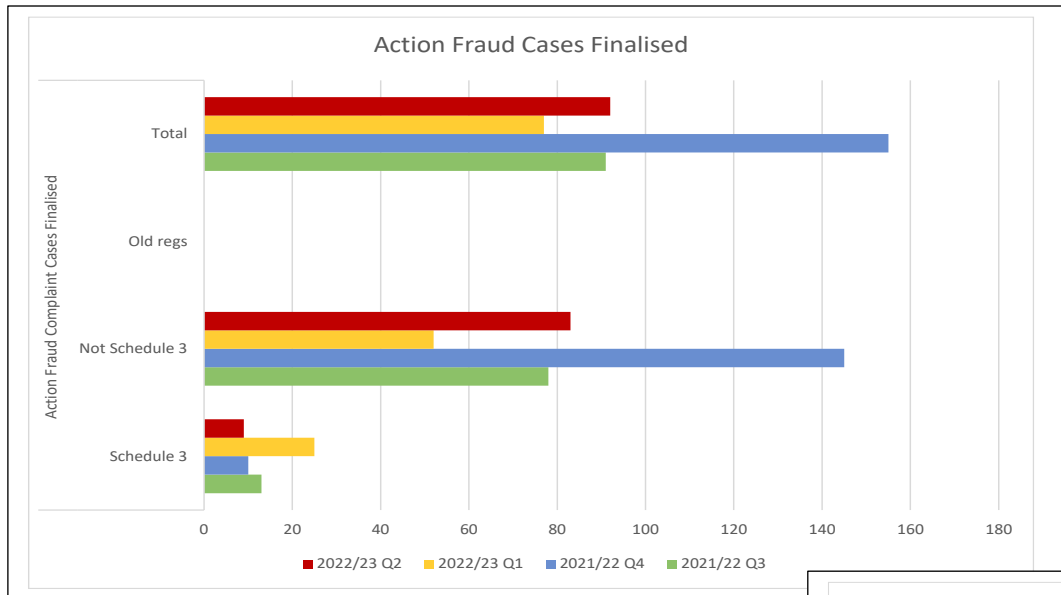
- AF has not investigated a report made
- NFIB has not investigated a report made
- Complainant advised that there are no viable lines of enquiry to investigate their report, when viable lines of enquiries have been provided
- No update was provided, following report made to AF
- Report disseminated 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.

- Of the 90 allegations recorded during Q2 2022/23, Police action following contact was the highest category with 61, followed by Information 10, followed by General level of service 9. The graph visualises the trend of Decisions over the rolling yearly data being the constantly highest category.
- 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.
- The IOPC has published the yearly bulletin covering 2021/22. 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.
- The IOPC are finalising the new quarterly bulletins but are not yet published externally. AF cannot be compared against any other National data, as being a unique service. The quarterly bulletins amalgamate both CoLP and AF data together which is unhelpful to provide context to either compared to other Force complaint data.

## Professional Standards and Integrity Report Nov 2022

Table 3 – Finalised – Cases and Allegations – Q2

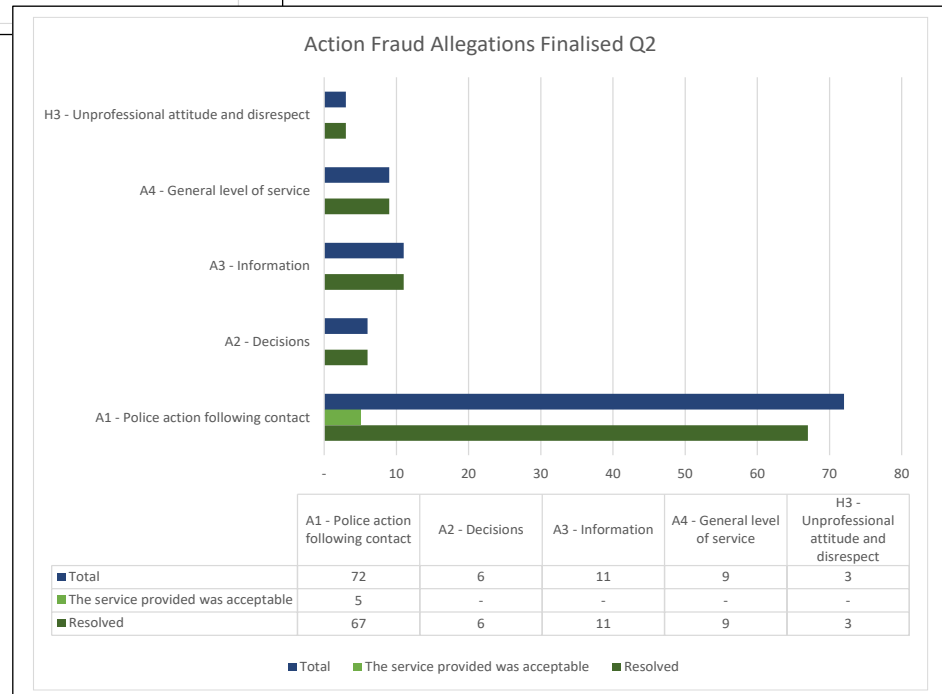


## AF Finalised Cases: -

- 92 Action Fraud cases have been finalised during the Q2 2022/23.
- 83 fell outside of Schedule 3.
- 9 fell within Schedule 3.
- Q2 saw finalisations increase by 15 cases (19%) against the previous quarter.

## AF Finalised Allegations: -

- 101 allegations have been finalised in Q2 2022/23.
- No outcomes were found that the Service provided was not acceptable.
- 96 (95%) allegations were Resolved.
- 5 allegations Service was found to be acceptable.



## Professional Standards and Integrity Report Nov 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).

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<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Dated:</b> 29 November 2022
<b>Subject:</b> Review of the Baroness Casey Misconduct in the Metropolitan Police Service- Interim review of recommendations for the City of London Police	<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 116-22	<b>For Information</b>
<b>Report author:</b> Claire Cresswell, Detective Chief Inspector, Professional Standards, Professionalism and Trust Portfolio	

## Summary

The Baroness Casey review of the culture and standards within the Metropolitan Police Service published its initial findings on 17<sup>th</sup> October 2022. It is important that the City of London Police review their own culture and standards in light of the findings to provide crucial learning opportunities and to develop confidence in the Force's ability to identify and manage misconduct and poor behaviour.

A full review will be undertaken in due course under the governance of the Professionalism and Trust Portfolio and reported directly into the Force's Renewing and Rebuilding Trust and Confidence Board for scrutiny. However, this interim report outlines the swift initial review to draw out key learning or areas for development. Each recommendation is covered in turn with high level responses provided.

## Recommendation(s)

Members are asked to note the report.

## Main Report

### 1. Background

The Baroness Casey review of the culture and standards within the Metropolitan Police Service published its initial findings on 17<sup>th</sup> October 2022. It is important for the City of London Police review their own culture and standards in light of the findings to provide crucial learning opportunities and to develop confidence in the force's ability to identify and manage misconduct and poor behaviour.

## 2. Current Position

Each recommendation from the Baroness Casey review has been reviewed against the City of London Police data and management process. This interim report outlines a swift initial review to draw out key learning or areas for development. Each recommendation is discussed in turn with high level responses provided. At a later stage a full review will be undertaken under the governance of the Professionalism and Trust Portfolio and reported directly into the Force's Renewing and Rebuilding Trust and Confidence Board for scrutiny.

## 3. Recommendations review

- 1) **The Met takes too long to resolve misconduct cases. On average, the Met takes 400 days to finalise misconduct allegations from start to finish. Even removing those involving the Independent Office for Police Conduct, cases still take, on average, nearly 350 days. Nearly 20% of misconduct cases take more than two years to finalise.**

**CoLP position:** For the years 2020-2022 the force took on average 58 days to investigate misconduct cases. There has been an increase of 400% in the financial year 2022-23 of misconduct cases so the force will need to review how this impacts timeliness in the future. No cases took more than a year to finalise.

- 2) **Officers and staff do not believe that action will be taken when concerns around conduct are raised. And they are right not to do so as, consistently, 55-60% of misconduct allegations made by Met officers, staff and their families receive a 'no case to answer' decision. Line managers and supervisors are warning staff against taking misconduct action, so that the view that nothing happens is institutionalised.**

**CoLP Position:** Culturally the force has put a lot of emphasis on the importance of challenging and reporting inappropriate behaviour and providing education on this process. This is supported by the force values and reinforced through communication, education and inputs.

For misconduct cases over the period of 2020-2022 50% of misconduct cases resulted in a case to answer. Of the nine cases with no case to answer, one was discontinued and three resulted in Reflective Practice. The Op Hood review considered specific conduct cases linked to sexual and domestic abuse and found that decision making was appropriate and proportionate including the outcome reached. The Professional Standards Dept (PSD) Senior Leadership Team (SLT) continues to have oversight of all conduct cases to ensure appropriateness of investigations and outcomes in line with Police Conduct Regulations.

- 3) **Allegations relating to sexual misconduct and other discriminatory behaviours are less likely than other misconduct allegations to result in a 'case to answer' decision. 'Case to answer' decisions are given to 20% of**

**allegations concerned with breaching equality and diversity rules, and 29% of allegations involving sexual misconduct compared to 33% of all finalised allegations. This suggests that equality and discrimination issues are not being tackled effectively.**

**CoLP Position:** The force recently conducted Operation Hood, a historical review of cases of Domestic abuse or sexual abuse (DASA). It found that the force was higher than the national average in relation to investigations that resulted in a case to answer. Nationally 32% of DASA cases have a positive outcome. For the City of London Police 37% resulted in a positive outcome/case to answer. The historical review has identified learning that should further increase the positive outcome rate for such cases in the future,

- 4) The misconduct process does not find and discipline officers with repeated or patterns of unacceptable behaviour. Between 2013 and 2022, 20% of officers and staff in the misconduct system have been involved in two or more cases, but the data shows that less than 1% of those officers have been dismissed. The current approach to misconduct only allows for allegations to be dealt with individually and as far as we can see, connections are not made to prior concerns raised which fall short of formal misconduct. This means repeated or escalating misconduct is not spotted, missing those who potentially pose most risk to others.**

**CoLP Position:** Much of the difficulty with patterns of behaviour where previous matters have been dealt with, is that the Police Regulations are overly complex and bureaucratic and do not allow for cases that have outcomes already to be reconsidered. However, the Counter Corruption team has proactive capabilities to identify repetitive patterns of behaviour that are concerning, and to put action in place through set processes to ensure any further misconduct is identified at the earliest opportunity. In addition, where an officer goes through a misconduct process, previous misconduct outcomes or relevant material is shared appropriately with the panel to ensure that the background of the officer is known. This makes for more sound decision making whilst working within the confines of Police Regulations.

- 5) The Met does not fully support local Professional Standards Units (PSUs) to deal with misconduct effectively. Many misconduct cases are handled by the local PSUs working in individual commands rather than the central Directorate of Professional Standards (DPS). It is my view that PSUs are overstretched, under resourced and do not receive training in misconduct, undermining local efforts to improve standards of behaviour. Greater authority and support should be given to PSUs as a matter of urgency.**

**CoLP Position:** The City of London Police does not have this issue. All complaint and conduct matters are investigated within the central Professional

Standards Department under the direction and control of the Head of PSD. This means that all investigations are conducted by officers with consistency of approach, appropriate training and expertise to manage the case and have the correct level of supervisory oversight by a supervisor with knowledge of the Police Regulations.

- 6) The Met is not clear about what constitutes ‘Gross Misconduct’ and what will be done about it. The Met threshold and interpretation for what counts as ‘Gross Misconduct’ is set too high, meaning too many of those who fall short of what the public would expect cannot be removed. In addition to this, where a case to answer for ‘Gross Misconduct’ is found, the number of those actually dismissed has fallen significantly in recent years.**

**CoLP Position:** The subject of whether PSD is setting the bar for Gross misconduct too high may need review by an external force or different area of the business to ensure appropriateness. However, as recommended nationally, PSD has had consistency of staffing in critical roles for the past eight years, the two delegated Appropriate Authority roles have been held by two individuals for the whole period, meaning that there is consistency of approach to what constitutes Gross Misconduct. This is informed by the values of the force, the public expectation, considers regional and national trends and uses the College of Policing Guidance on Misconduct Outcomes in all cases. Oversight is provided by the ultimate Appropriate Authority at Chief Officer Level.

- 7) There is racial disparity throughout the Met’s misconduct system. Despite improvement, it was still the case in 2021-22 that Black officers and staff were 81% more likely than White officers to have misconduct allegations brought against them, while Asian officers were 55% more likely. Black and Asian officers were also more likely to have an allegation substantiated than White officers. This is a long standing issue and is clear evidence of systemic bias.**

**CoLP Position:** The City of London PSD provided a report on Disproportionality of Misconduct outcomes to the Chief Officer Team and key internal stakeholders two years ago. This report is in the process of an additional review with the latest datasets available. This is part of the force’s work to address the national Race Action Plan. However, due to the low number of officers dismissed in force, data is not statistically significant or useful because it is heavily impacted by single cases. PSD is also conducting a historical review of allegations of racial discrimination allegations made internally and of conduct cases linked to racial discrimination internally and externally. It will also consider if more black officers and staff are referred to PSD by their line management. It is hoped that this review will inform learning and improve the service provided with regards to these type of cases in the future.

- 8) Regulation 13 is not being used fairly or effectively in relation to misconduct. Regulation 13 (which allows for the removal of probationers) is not being used to remove enough of those officers who should not be in policing, with only 8% of cases in the most recent year resulting in dismissal. Regulation 13 is also, however, being used disproportionately on those from ethnic minorities, with Black officers being 126% more likely and Asian officers 123% more likely to be subject to a Regulation 13 case than White officers.

CoLP Position: The City of London Police has not historically used regulation 13 effectively. Over the last five years, there is only one recorded instance of Regulation 13 being used which was in August 2022. There is therefore no statistically relevant data available to consider disproportionality of its use, though it is noted that the officer dismissed was a white male. There has been much national pressure to use Regulation 13 effectively. PSD has a SPOC who provide HR and learning and development with support and guidance in this area. Key stakeholders in the force are due to go on national Regulation 13 training and the Chief Officer Team are supportive of its use when appropriate. Learning and Development Senior Leaders will ensure effective training and awareness in this area for all their staff. Consideration is being given to providing an input to supervisors on Regulation 13 so they can identify cases at the earliest opportunity that may be suitable for this process. Where it is appropriate to use Misconduct regulations and ensure inclusion on the Barred list this process is followed effectively.

#### **4. Conclusion**

The Force is working to ensure that it continues to improve its management of conduct against officers. The findings of this initial review alongside the full review managed by the Professionalism and Trust Portfolio will ensure the recommendations in this report are carried forward with appropriate oversight and scrutiny. This will help to ensure that professional standards are maintained and there is continuous improvement in this area.

### **Background Papers**

**Baroness Casey Interim Review of Misconduct in the Metropolitan Police Service** - [Analytical Report - evidence to support Baroness Casey of Blackstock's conclusions about the current misconduct system in the Metropolitan Police Service](#)

#### **Contact:**

**Claire Creswell**

**Detective Chief Inspector**

Professional Standards

Professionalism and Trust Portfolio.

E: [Claire.cresswell@cityoflondon.police.uk](mailto:Claire.cresswell@cityoflondon.police.uk)

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<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Dated:</b> 29 November 2022
<b>Subject:</b> Police Uplift Programme- Focus on Diversity	<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 117-22	<b>For Information</b>
<b>Report author:</b> Christopher Hay, Chief Inspector, Police Uplift Programme Manager	

## Summary

At the Resource Risk and Estates Committee on the 5th September 2022 a discussion took place as part of the quarterly workforce update regarding diversity in recruitment and particularly the gender disparity. An action was issued for the Force to report to the Professional Standards and Integrity Committee in more depth on diversity issues, as the Committee with primacy for Equality, Inclusion and Diversity.

This report will outline the outreach and recruitment journey for Year 3 of the Police Uplift Programme focusing on diversity and efforts made to enhance diversity within our workforce. The report details the initial challenge and journey to date, the formation of the Outreach Team and tactics employed, the candidate journey from application to hire, positive action and support, details of the candidate pool, utilisation of the provision of equal merit and candidate engagement and retention. The report concludes with some case studies and quotes from diverse student constables around their experiences of City of London Police (CoLP) and the recruitment process.

This report outlines a number of measures taken by CoLP to enhance gender parity and the number of officers from under-represented groups and the key highlights are briefly detailed below:-

The outreach team has attended 36 events since its inception and this has had a positive effect on recruiting females and candidates from under-represented groups, however, digital recruitment targeting on specific recruitment sites yielded better results in terms of applications from females and candidates from under-represented groups.

It is believed that the positive action tactical options employed have positively impacted the recruitment journey for those that have applied from under-represented groups and this is evident from the positive action webinars and subsequent success at the Online Assessment Centre stage.

Utilising the provision of equal merit under the Equality Act has been vital to increase gender parity and representation from ethnic minority groups.

Although CoLP are achieving uplift, continuing the outreach work on a smaller scale and maintaining established relationships built over the course of the year is paramount to future recruitment. CoLP remain an attractive employer with healthy pipelines of transferees and student constables from diverse backgrounds.

## **Recommendation**

It is recommended Members note the report.

## **Main Report**

### **The Challenge**

As a force, failed to meet our Year 2 uplift targets and as such the Chief Officer Team assigned a dedicated Uplift Programme Manager and Senior Responsible Officer, to focus and drive performance into Year 3 of the Uplift and make up our Year 2 deficit. This dedicated team was provided with augmented support and enabling assets to deliver on the Uplift, with a continual focus on performance and delivery of CoLP's Year 3 plan. It is predicted that CoLP will now achieve the Year 3 Uplift target headcount by the end of the financial year.

The below table details the recruitment and headcount progress since 31<sup>st</sup> January 2022.

Headcount 31/01/22	846
Starters 31/1/22 - 30/09/22 (including ROCU) Student Constables Transferees	185 (102) (83)
Leavers since 31/01/22 – Sept 2022	-61
<b>Headcount at end of Sept 2022</b>	<b>970</b>

### **The Outreach Team**

The Outreach Team officially began its work in May 2022, consisting of 1 Sergeant and 2 PC's. The Outreach team has been heavily involved in keeping candidates 'warm', attending recruitment and community events, organising CoLP open days and events, creating and delivering briefings, compiling bespoke support packages for student constables and facilitating Online Assessment Centre (OAC) masterclasses. In addition, the team has shown a commitment to increasing Diversity and Equality within force, via various initiatives and projects, working closely with all departments and networks. The team has also reviewed, reformed and created new force Policy and Procedures, namely CoLP's Trans and Non-Binary Standard Operating Procedure (SOP) and support and guidance to line managers.

Outreach events attended between May – October 2022 = **36 with 9 events still to attend**  
– (15,000 attendees expected at Ascot Show in November).

Engagements at events equates to **28,245+** persons engaged with.

In addition to the physical outreach, the Outreach Team has been working in the digital space and have achieved the following:-

1. **UCAS<sup>1</sup>**: mailshot sent to 4,279 students graduating from the Professional Policing & Criminology degrees in 2022.
2. **Online recruitment company strategy**: 55 student officer adverts placed in various locations around London and neighbouring counties, generating 3,312 Expression of Interests (EOI's), increasing weekly applications up to 80-110 per week. This activity delivered an increase in applications from female and candidates from under-represented groups.
3. **Recruitment Company**: A specific campaign through a specific company was used to target universities and the last campaign was used to target diverse boroughs of London, resulting in 381,077 impressions (reach), 1,032 people directed to CoLP careers page to apply. Engagement with the advert was 94.9% from under-represented groups and 5.1% white candidate engagement.
4. **Total student constable applications = 1940** is the total number of applications that have been received. Of these, 776 have been sifted and progressed, with 33% female applications, and 40% applications from candidates from under-represented groups.

The Outreach Team has also completed additional outreach to focus on attracting women and diversity into CoLP by attending events at religious centres, colleges/universities. The outreach team has also been doing some collaborative working with Lancashire Outreach Team around 'Bleep Tests'<sup>2</sup> in the Community for Under-Represented Groups. This is ongoing but we have provisional approval from the East London Mosque to host later this year.

Furthermore, CoLP has recently reviewed recruitment campaigns and marketing material to ensure it is inclusive, supports gender equality and promotes role models for all communities. In addition, CoLP has undertaken a thorough Equality Impact Analysis, that ensures equality of opportunity during training across a variety of impact areas linked to gender equality.

Below is a photo from September 2022 of the Outreach Team and other volunteers at the Milton Keynes Job Fair

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<sup>1</sup> UCAS- University and College Admissions Service- [About us | UCAS](#)

<sup>2</sup> Bleep Test- shuttle run and multi-stage fitness test



## **The Recruitment Process**

Below, is a graphic of the current recruitment process, which applies to all student constables and follows the newly introduced processes by the College of Policing, namely the National Sift and Online Assessment Centre. The length of the candidate journey can vary depending on vetting, medicals and other employment checks, but local governance procedures have meant that the recruitment journey has been streamlined.



## **Positive Action**

There has been a number of tactical options employed to increase the number of applications from diverse candidates. Some of the innovative tactical options employed are listed below:-

- Targeted advertising through specific recruitment company to diverse boroughs of London & the South East.
- Use of appropriate recruitment company advertising service to target under-represented and Female candidates – 94.9% under-represented engagement.
- Buddy system and Outreach Team making contact with under-represented and female candidates, to provide support through the recruitment process.
- Use of a bulk text messaging service to send out reminders for completed employment documents or deadlines.
- Guidance documents produced to help candidates prepare for the National Sift and Online Assessment Centre. Recent online assessment pass rate increased to 66% where we have included the guidance document.
- Webinars available to help candidates prepare for Online Assessment Centre. 5 specific webinars on the application form / online assessments with a reach of 180

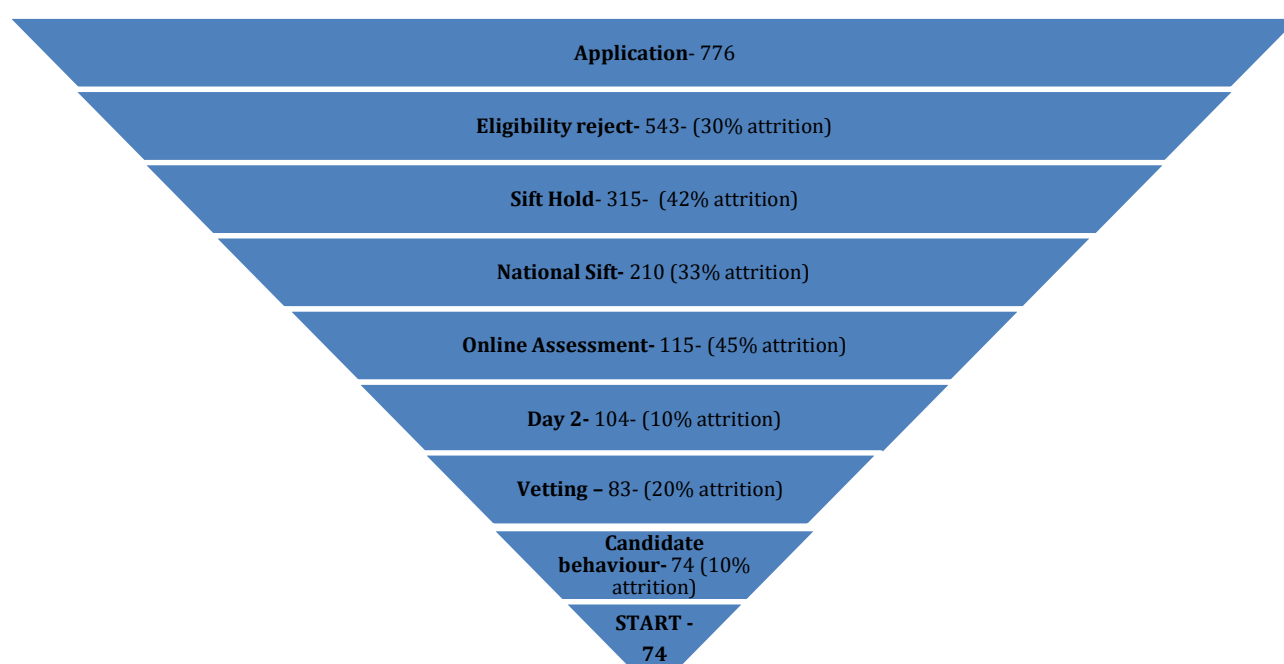
diverse candidates. In addition, 4 CoLP information webinars, reaching 150 diverse candidates

- In person workshops, where possible, to help candidates prepare for the Online Assessment Centre. Two of the recent in person workshops, where 30 candidates attended, increased the Online Assessment Centre pass rate from c.50% to c.70%.
- Specific candidate pipeline lists created and monitored daily/weekly to ensure candidates are progressing through the recruitment pipeline.
- Weekly pipeline review meeting including stakeholders from vetting and Occupational Health (OH) to highlight candidates who may need assistance in any stage of the process.

### **Recruitment Pool Drop-Off for Diverse Candidates**

The majority of sift holds sit at the point where CoLP is waiting for candidates to send proof of their educational certificates. Although, CoLP engage with candidates through emails, calls and text messaging, we are still dependant on candidates sending the documents in themselves. With the implementation of the Oleo ATS platform in the future, we hope this statistic will improve, as candidates will be required to upload evidence at point of application.

Out of the projected 74 candidates, we have approximately 40 candidates who have reached the point of conditional offer, with the remainder who may have applied relatively recently still to come through the recruitment process.



## National Sift and Online Assessment Centre

Sift status	Total
National sift invited	306
OA invited	407
OA Passed	235
Reject - Failed CoLP OAC	115
Sitting OA with another force	20

The data for the National Sift and Online Assessment Centre for CoLP is provided in the table. Also provided are the pass rates broken down by gender and ethnicity from our August and September Online Assessment Centre Candidates. In August we had 22 passes out of 50 candidates that sat the online assessment centre and of those that passed 4 were female and 5 were from under-represented groups. September Online Assessment Centre results are expected on 4<sup>th</sup> November and with the additional support provided we are hopeful that more female and under-represented candidates pass.

## Student Constable Intakes/Transferees and the Provision of Equal Merit Under s.159 Equality Act

The below table details the breakdown of our student constable applications that have been received by entry route.

Entry Route	Total Active Applications	Male	Female	Gender Not stated	Under-represented Group	Ethnicity /not stated / prefer not to say
DHEP	226	137	84	5	81	17
PCDA	344	217	114	13	111	32
IPLDP	287	210	73	4	110	15
Pre-Join	13	7	6	0	4	0
Detective DHEP	44	20	23	1	11	6
DC/PC DEHP	22	11	11	0	0	9

DHEP- Degree Holder Entry Programme

PCDA- Police Constable Degree Apprenticeship

IPLDP- Initial Police Learning and Development Programme

The below table details the cohorts throughout Year 3 of the Uplift including details of gender and ethnicity.

Overview of Intakes / Offers									
13/10/2022	Total Pool at conditional offer stage	Final Offer Accepted	At Vetting Risk ma	Conditional offers	Male	Female	Gender Not stated	Ethnicity /not stated / prefer not to say	BAME
IPLDP & Pre Join	62				50	11	1	6	14
8th August 2022		27			22	5	0	0	
22nd August 2022		24			15	9	0	2	
28th November 2022		17			12	4	0	0	7
PCDA	4				4	0	0	0	1
19th September 2022		15			14	1	0	1	1
DHEP	36				22	13	1	1	12
DHEP -26 September 2022		20			16	4	0	0	5
Police Now	14				7	7	3	0	2
20th March 2023									
Overview of applicant pool ( work in progress)									

### Breakdowns per cohort

#### 8<sup>th</sup> August 2022 intake -Total 27

5 Females - all white

22 Males - 3 from under-represented groups

#### 22<sup>nd</sup> August 22 - Total 24

9 Female - all white

15 Males – 3 from under-represented groups

#### 19 Sept 2022 - Total 15

1 Female - white

14 male (1 from under-represented groups + 1 prefer not to say)

#### 26<sup>th</sup> Sept 2022 – 20 Total

4 Female (2 from under-represented groups )

16 males ( 5 from under-represented groups)

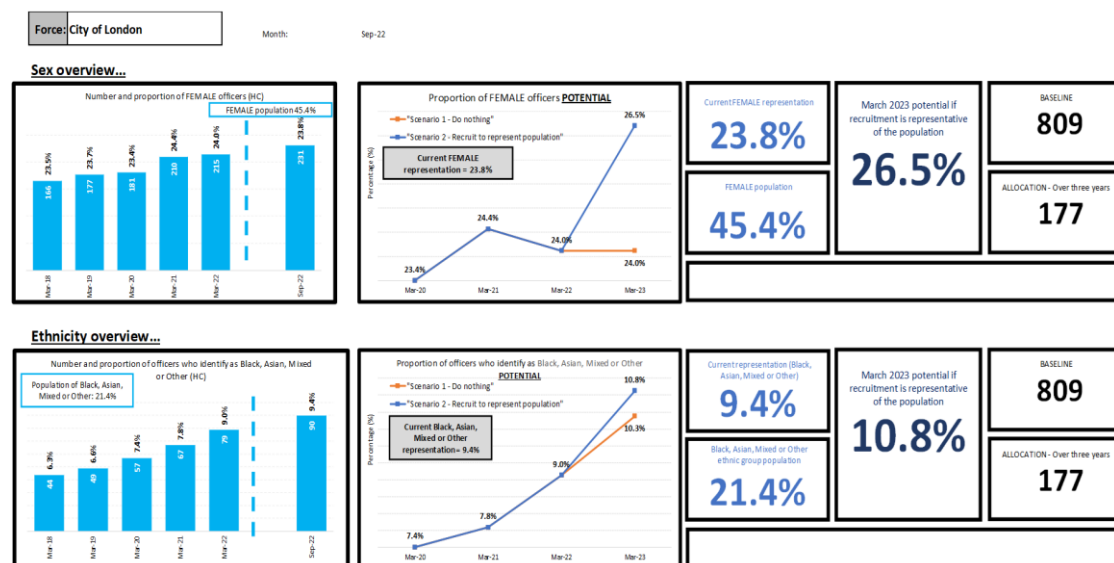
Our student constable intakes have improved in terms of gender and diversity and with one of the IPLDP intakes in August, we had 38% gender parity, which is the highest the force has seen ever amongst student constable cohorts.

As the force is in a fortunate place, in terms of meeting its Year 3 headcount, we have utilised the provision of equal merit under s.159 of the Equality Act to improve our gender parity and diversity representation further. CoLP has a scheduled IPLDP course in November of 28 constables. As it stands, 19 have been given final offers and of those, 9 are from under-represented groups and 4 are female. We expect 5 female candidates to fill the remaining 9 places, taking the overall cohort gender parity to 32% and diversity to 34%.

In relation to our February IPLDP course, we have a pipeline pool of around 100 candidates for a maximum of 25 places on the course. The current pipeline will meet our gender and diversity ambitions. Finally, CoLP currently has a pool of 14 'Police Now'<sup>3</sup> candidates for the Cohort of 10 Police Now starting in March 2023. This cohort offers diversity with 7 being female and 3 from under representative groups.

<sup>3</sup> Police Now- National Detective Programme- [National Detective Programme](#) | [Police Jobs](#) | [POLICE NOW](#)

## Overall Projected Diversity and Gender overview for CoLP



It's clear from the above Home Office projected data on CoLP's diversity and gender breakdown, that this improves towards the second part of the financial year when the student constable cohorts commence.

With regards to transferees, the candidate pool offers less diversity than that of the current student constable pipeline, with around 20% gender parity for female candidates and approximately 14% from under-represented groups in the transferee pipeline. Even utilising the equal merit provision this is still not in line with CoLP diversity ambitions.

## Recruitment Pool Engagement

All candidates who have been rejected/failed/unsuccessful with their application, the national sift or the online assessment centre receive communication that CoLP would welcome applications from them in the future if they feel they will meet the entry criteria again. In addition, once special constable recruitment re-opens we will send out communication to any candidates who may be suitable to invite them to apply.

## Student Officer Retention Scheme

### The Friendly Ear Scheme

In 2022 CoLP launched The Friendly Ear, a scheme with the aim of providing a channel for student and probationer officers to speak to an experienced officer about any concerns they may have or issues they are experiencing should they be considering their future with the force. The Friendly Ear Scheme is completely confidential and can be contacted on an ad-hoc basis when needed. Anonymised information and patterns harnessed by The Friendly Ear scheme are then collated and reviewed to help identify any harmful trends and looks to retain diversity and gender as a priority.

The scheme also includes a proactive data science element, data insights have then been used to develop a 'Flight Risk Tool' which calculates the resignation probability of each new

student officer which is factored into student officer tutorials and a package of support made available to them. CoLP has worked with a data science consultancy who will update and refine the tool in the coming months.

The Friendly Ear Scheme will also be working with Professional Standards Department to ensure that action is taken if the need is identified. All Response Group supervisors have been briefed on the scheme so they can signpost student officers as needed. All new student officers have been provided with details of the scheme in their new starter packs as well as in person at Open Days, Open Evenings and in the classroom. Finally, the National Uplift Team has identified this scheme as an innovative initiative that they are looking to fund further and roll out to forces nationally. A great piece of innovation from CoLP.

using data from previous intakes of student officers to identify key trends to support the next generation of students. These

### **Under-represented Student Officer Case Studies**

#### **1) PC- Female**

This applicant joined CoLP in September 2022 as a Student Officer on the PEQF Degree Holder Entry Programme pathway. Prior to joining CoLP, she graduated from University of Greenwich with a BSc Biomedical Science degree in 2014. She worked in retail for a number of years where she also travelled very frequently. She joined the MPS and started training as a student officer and now hopes to continue her policing aspirations with the City of London Police. Reflecting on her experiences of joining CoLP, she said: *"I applied to work for City of London Police as a Student Police Officer and went through a smooth and continuous process. CoLP was understanding of my move from another force and handled vetting matters sensitively which made me feel included whilst still in the recruitment stage. When I joined, Student Police Officers are treated the same and are equally supported which in turn reflects our treatment of each other."*

#### **2) PC -Male**

This applicant joined CoLP in September 2022 as a Student Officer on the PEQF Degree Holder Entry Programme pathway. Prior to joining CoLP, he went to university to study International Business and during that time enrolled in modules relating to ethics, law, and regulation. He has always wanted to work in a field where he could make a difference, specifically in financial crime, hence applying to CoLP with its national lead force portfolio. This officer was born in Cuba.

On his journey so far at CoLP he has reflected: *"Having dual nationality Cuban/German I have found that the recruitment and training so far has been perfectly apt and has not raised any concerns. I do not feel that I am or am treated any different to anyone else."*

### 3) PC - Male

This applicant joined CoLP in September 2021 as a Student Officer on the inaugural PEQF intake of the Degree Holder Entry Programme. He has excelled throughout his classroom training and tutor phase and passed out on the 25 October. He is now a Response Officer on E Group and also a Physical Training Instructor who supports the fitness training of others across force notably new student officers in training. Speaking of his experience joining CoLP he reflected, *"Whilst applying to join CoLP, the recruitment process was clear and simple. Completing my fitness test was my first insight to operational police officers within the City of London, and I felt welcomed and supported from the start. The first day of training school I was understandably nervous, however the trainers were friendly and passionate, and the standards expected of me were clear. I loved my time in training school, and I've been given all the tools and knowledge to do my job, and there hasn't been a moment where I haven't felt supported from my supervisors. My development post-training school has set with realistic and clear objectives and support from tutors"*

### **Conclusion**

Increasing diversity and gender parity has been at the forefront during the Uplift, albeit the force had the dichotomy of increasing the forces headcount rapidly at the end of Year 2 and into Year 3 of the uplift, whilst focussing on increasing gender and diversity. As the year has progressed the force has continued with a number of outreach and positive action tactical options, including utilising the provision of equal merit for student constables, which will see even more diverse and gender representative cohorts towards the end of the financial year.

As CoLP hits its Year 3 target headcount some of the outreach work will begin to reduce, however, there will be a cadre of volunteers that can be utilised when the force steps recruitment back up after the uplift. Moreover, the outreach team has established a number of great working relationships with job centres, recruitment companies and universities and colleges that will be maintained to ensure support is available to CoLP when next recruiting.

#### **Contact:**

**Chris Hay**

**Chief Inspector**

**Police Uplift Programme Manager**

HQ Services - City of London Police

e [christopher.hay@cityoflondon.police.uk](mailto:christopher.hay@cityoflondon.police.uk)

m 07730 825 058

<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Dated:</b> 29 November 2022
<b>Subject:</b> Q1 & Q2 Stop and Search and Use of Force Update 2022-23	<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 113-22	<b>For Information</b>
<b>Report author:</b> James Morgan, Superintendent, Head of City Police Task Force and Head of Contact	

## Summary

This reports covers Q1 and Q2 of FY 22/23: due to Operation LONDON BRIDGE it was not possible to complete the Q1 report in time for the Committee's last meeting.

The use of Stop/Search powers, and the Use of Force, remain broadly in line with the established trends although both (overall) are down in this reporting period compared the corresponding reporting period in 21/22.

There have been no juvenile strip searches during the reporting period.

Taser use remains broadly consistent with the same period in 21/22, with 44 'uses' but no discharges (or firings).

## Recommendation

Members are asked to note the report

## Main Report

### Background

1. Members are asked to note that this report covers the Stop/Search and Use of Force data for Q1 and Q2, due to the impact of Operation LONDON BRIDGE on the original timeline for preparing the Q1 report.

### Current Position – Stop Search

2. Over the first two quarters of FY 22/23, the force conducted 1092 Stop/Searches, leading to 299 arrests. Overall, the positive outcome rate for this period was 39%. This compares to 1424 stop/searches in the same period in FY 21/22 (down 23%); however, over the same comparator period the positive outcome rate was lower at

34%, whilst the number of arrests was slightly higher at 322 (a decrease of 7%). Members are reminded that positive outcome is recorded where the object of the search is found, and does not necessarily reflect arrest rates (finding the object of a search does not automatically result in an arrest).

3. There have been no searches conducted under s.60 authorities over this reporting period and no s.60 authorities have been granted. This compared to 1 search conducted in the same period in FY 21/22 (conducted in the MPS force area under an MPS authority).
4. Over this reporting period 107 juveniles (ages 10-17) have been searched. Of these, the majority (74%) were searched for going equipped, possession of a weapon (inc 2 for possession of a firearm) or stolen property: 20% were searched for drugs. In contrast, in the adult population the majority of searches were conducted for drugs (51%), with 31% of the adult population being searched for going equipped, possession of weapon or stolen property. This is in line with the established trend, which sees the majority of searches overall being conducted for drugs, but within the juvenile cohort the main reason for searches being offensive weapons and going equipped.
5. For the current reporting period, the disproportionality for black members of the community was 2.4 (compared to 2.0 in the comparator period). This is within the established trend of between 1.9 and 2.5 over the preceding two years. Of black individuals stopped, the majority (50%) were searched for drugs, which is broadly in line with the adult population as a whole, whilst 43% were searched for going equipped etc., which is slightly higher than the adult population as a whole. However this does represent a decrease on the same period last year, where 72% of black individuals stopped were searched for drugs, with a 42% positive outcome rate (and 27% arrested). In contrast for this reporting period there was a 40% positive outcome rate (and 21% where arrested). Fewer black members of the community were stopped in this reporting period 98, compared to the previous year (133).
6. For Asian individuals, the disproportionality has dropped slightly from 1.5 in the comparator period to 1.2 in this reporting period. The majority of Asian individuals searched (61%) were searched for drugs, which is at odds with the adult population as a whole. However, when searches leading to arrests are considered in isolation, the disproportionality for Asian individuals falls to 0.8.
7. Searches under s.23 of the Misuse of Drugs Act continue to account for the majority of stop/searches, in line with the established trend. Searches under this power have a high positive outcome rate, with items being found in 43% of searches (drugs being found in 39% of searches and other items in 4%).
8. **Repeated Searches.** Committee members have previously asked for data on individuals subject to repeated searches. Members will recall that the design of force systems does not allow for this data to be provided; however based on a manual review of records for Q1 and Q2 of this financial year we can provide the following information on a 'one off' basis as a snapshot. Discounting duplicate entries or records where the subject has declined to provide their name, there are

29 records in Q1 and Q2 where the same person was subject to a search by City of London Police officers on more than one occasion: this represents 3% of the total searches over this period. A more detailed analysis of this sub-cohort is not possible.

9. **Strip Searches.** Members are reminded that stop/search legislation affords power to require the removal of different levels of clothing. For searches conducted on the street, only 'JOG' items (jacket, outer-garment, gloves) maybe removed. If more than 'JOG' items are removed, then the search constitutes a 'strip search' and must be recorded as such. There are two levels of strip search. A 'More Thorough Search' which can involve the removal of more than JOG items but not require the removal of underwear. A More Thorough Search must be conducted out of public view (this can include inside a police vehicle). If underwear is removed, this constitutes an 'Intimate Parts Exposed' search. Such a search may only be conducted in a police station. Force policy is that a Supervisor must be consulted and agree with the search (under legislation they are only required to be informed). Juveniles may be strip searched, but although there are no additional legislative bars which must be cleared to conduct such a search, in practise for it to be proportionate the grounds for such a search **must** be significant and robust, and recorded as such. When a juvenile is subject to any degree of strip search an appropriate adult should be present unless there is an overwhelming reason to conduct the search in their absence (for example, suspecting that the subject is concealing a weapon with the intention to hurt themselves or another person).
10. Members received a detailed update on juvenile strip searches at the last Professional Standards and Integrity Committee in September as part of a historic review conducted by the Professional Standards Dept.
11. As set out in our Q4 FY21/22 report, we will report on Strip/Searches in each of our reports to this committee.
12. Over this reporting period we conducted 29 strip searches, of which 2 constituted a More Thorough Search and 27 an Intimate Parts Exposed search (this compares to 45 in the comparator reporting period, of which 2 were More Thorough Searches and 43 Intimate Parts Exposed).
13. The majority (26) of strip searches were conducted under Misuse of Drugs Act powers, with 3 being conducted where the subject was thought to be going equipped or in possession of stolen goods.
14. Strip Searches may also be conducted in Custody, under separate powers within the Police and Criminal Evidence Act 1984. These are not conducted under Stop/Search powers, and are not recorded within Stop/Search statistics, or covered by this report.
15. **Juvenile Strip Search.** No under 18s were strip searched in this reporting period. As previously reported to the Committee, we will provide detail of any U18 strip searches in this report going forward in future.

16. **Dip Sampling.** The Force introduced a revised Standard Operating Procedure for the dip sampling of Stop/Search records in November 2021. As previously reported to this Committee, after an initial bedding in period in Nov and Dec 21, the new process became fully established from January 2022. The Force aims to achieve a 10-20% dip sampling rate, which is in addition to the 100% supervision of all Stop/Search and Use of Force reports by frontline supervisors. In addition to this, the Independent Advisory and Scrutiny Group (IASG) independently reviews a sample of stop/search record (and associated Use of Force records) each month, averaging approximately an 8-9% sampling rate. From November 2022 this will also include the review of selected Body Worn Video recordings.
17. Over the year to date (as at 29 Oct 22) the Force has recorded 1898 Stop/Searches, and we have internally dip sampled 282 of this: a sample rate of 13%. For Q1 and Q2, we recorded 1092 Stop/Searches and reviewed through dip sampling 188, giving a sampling rate of 14%.
18. The proportionate split between s23 Misuse of Drugs Act and s1 Police and Criminal Evidence Act records sampled is broadly in line with the split over the cohort as a whole (as set out above).
19. In June 2022 we introduced a change in the dip sampling process, requiring supervisors to rate each record they reviewed on a scale from 1 to 10. The scale is set out below. This change was introduced mid-month, so complete records for reviews against this new scale are only available for Q2 (Jul-Sep 22).
- a. **1 – Poor.** Very poor record or unlawful use of power.
  - b. **2-4 – Areas for significant improvement.** Serious omissions or errors with the conduct of the search.
  - c. **5 – Satisfactory.** Search was conducted lawfully and record is complete.
  - d. **6 – Good.** Search is conducted lawfully, record is complete, and officer acted in a professional manner.
  - e. **7-9 – Very Good.** Search is conducted lawfully, record is complete and accurate, and officer demonstrates very good professional standards, such as how they communicate with the subject, the respect shown the subject or their ability to de-escalate a situation.
  - f. **10 – Excellent.** An exemplar of how to conduct a Stop/Search in all respects which could be used for training purposes with new recruits.
20. For the period Jul-Sep 22, 93% of records reviewed scored 5 or above (99 records). For records covering Jul and Aug 22, the IASG found that 90% of the records they reviewed (27 out of 30) represented reasonable grounds (the review for the September records is not available at the time of writing). For Q1, the IASG found that 93% of the records they reviewed represented Reasonable Grounds.

21. Of the 6 records which failed to meet the standard, one record was scored as 1, and 5 records scored 4.
22. The record which scored 1 was reviewed by the officer's Inspector, who identified that the search commenced before GOWISELY<sup>1</sup> was given, when GOWISELY was given it was not given in full, and (most importantly) the grounds for the search were not sufficient to engage the power. The officer has been required to re-complete two eLearning packages, has been subject to a period of mentoring by an experienced and competent colleague and their subsequent searches are subject to detailed review by their Sergeant. A subsequent record (selected at random) of a search conducted by this officer by an independent supervisor scored 6, indicating that the training intervention has been successful.
23. In the records which was scored 4, there were two themes. First, the full points required under GOWISELY either not being given, or not recorded as Body Worn Video was activated too late. Second, where the officer conducting the stop is of a different sex to the subject of the search, and there is ambiguity in the record as to whether or not GOWISELY was given fully to the subject. In all cases, the officers involved have been debriefed and provided with support by their supervisors to learn from their errors.

### **Current Position – Use of Force**

24. Over this reporting period, a total of 1192 uses of force were recorded, compared to 1608 over the same period last year, a decrease of 26%. In both this reporting period and the corresponding reporting period last year 60% of uses of force involve arrests, and handcuffing remains the largest single use of force by a large margin.
25. Over this reporting period, batons have been used twice (3 times in FY 21/22) and police dogs have been deployed 4 times (14 in the same period in FY 21/22). A total of 7 officers were injured in incidents involving the use of force (18 in FY 21/22), and 22 subjects were injured as a result of the use of force (25 in FY 21/22).
26. Force remains most used against male subject (78% this reporting period compared to 79% in the comparable period FY21/22).
27. Disproportionality for Asian subjects of force is largely unchanged at 0.82 this reporting period, and 0.85 in the comparator period. However for black individuals, the disproportionality has risen from 2.2 in the comparator period to 2.78 in this reporting period. The proportion of use of force incidents involving black subjects leading to arrest is approximately the same as the population as a whole (61%). Similarly, the likelihood of taser being used is broadly the same: 3% for black subjects, 4% for the population as a whole.
28. **Taser.** Over the reporting period the Force recorded 44 uses of Taser, but no discharges. This compares to 46 in the comparator period, with no discharges

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<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.

also. Committee members are reminded that a use of a taser is recorded whenever an officer draws it from the holster, aims it, activates the laser 'red dot' sighting system or draws a subject's attention to the device with an "Arc Display" (showing the arching of electricity across the front of the device). Firing, or discharge, is recorded separately.

29. Due to a change in reporting processes and introduction of Power-Bi it is not currently possible to provide a more detailed analysis of taser use at this time, this is being discussed internally with the Director of Information with a view to developing capability / capacity in this area.

## **Conclusion**

30. Both Use of Force and Stop Search remain, largely, in line with established trends.

## **Appendices**

1. Data summaries

**James Morgan**

**Superintendent**

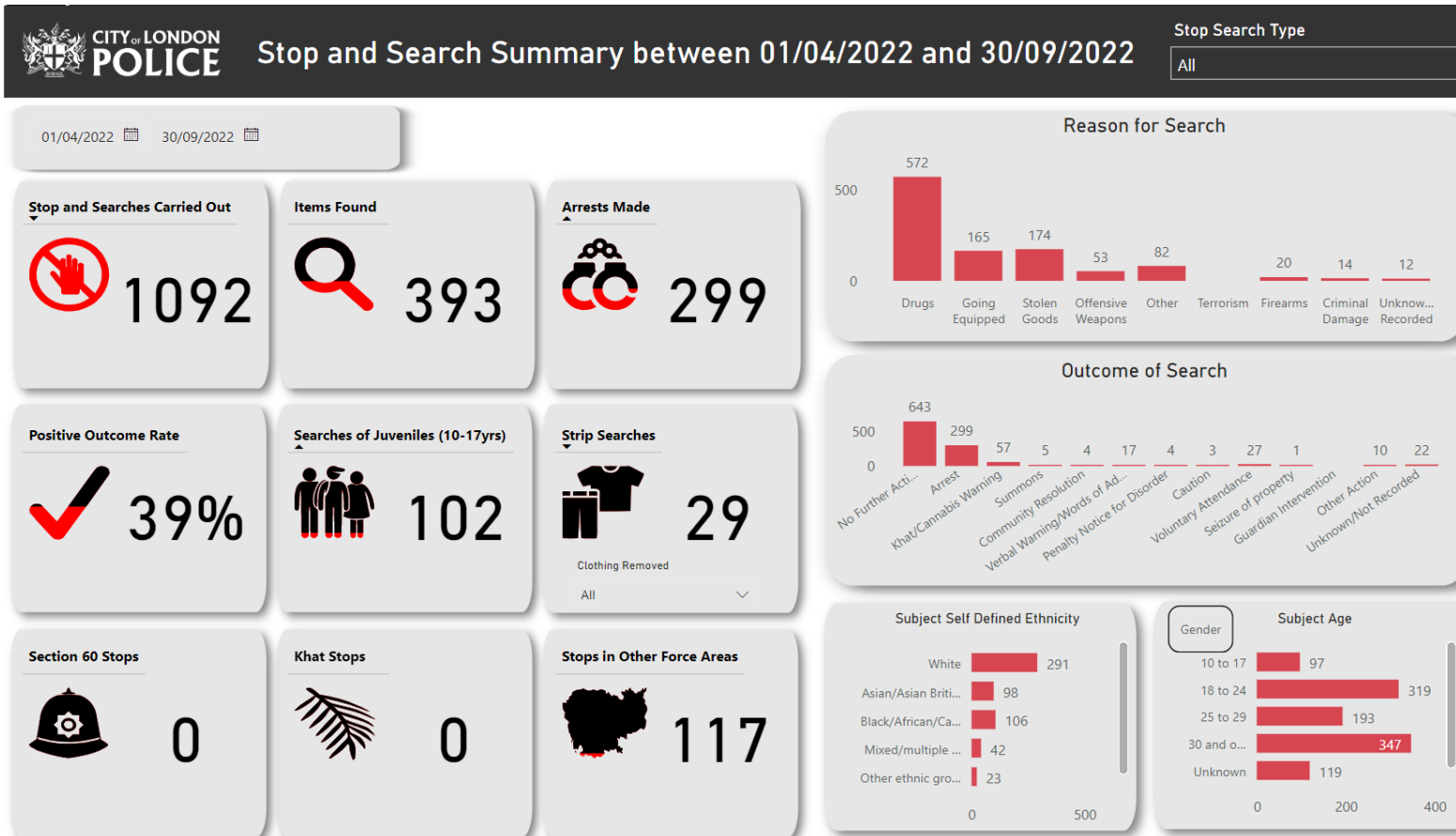
**Force lead for Stop/Search and Use of Force**

T: 020 7601 2102

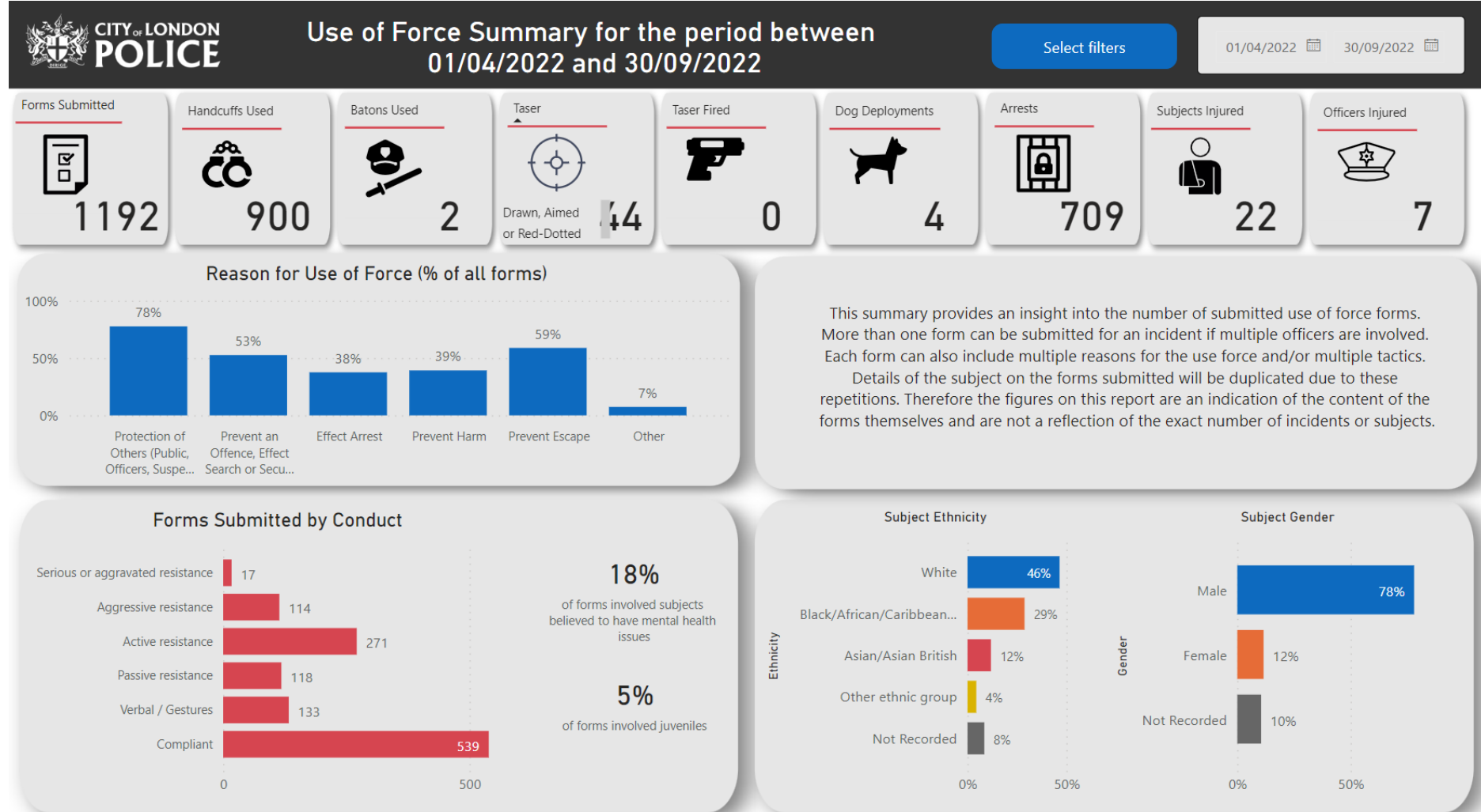
E: [james.morgan@cityoflondon.police.uk](mailto:james.morgan@cityoflondon.police.uk)

## Appendix 1 Data Summaries

### Stop Search



## Use of Force



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