



## City of London Police Authority Board

**Date:** TUESDAY, 2 MAY 2023  
**Time:** 11.00 am  
**Venue:** COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

**Members:** Tijds Broeke  
Caroline Addy  
Munsur Ali  
Nicholas Bensted-Smith  
Alderman Professor Emma Edhem  
Helen Fentimen  
Alderman Timothy Hailes  
Deputy Graham Packham  
Melissia Collett (External Member)  
Andrew Lentin (External Member)  
Sir Craig Mackey (External Member)  
Michael Mitchell (External Member)  
\*Vacancy  
\*Vacancy  
\*Vacancy

**\*MEMBERSHIP SUBJECT TO ELECTION AT THE COURT OF COMMON COUNCIL ON THURSDAY 27 APRIL 2023.**

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

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**Ian Thomas**  
**Town Clerk and Chief Executive**

# AGENDA

## Part 1 - Public Agenda

1. **APOLOGIES**

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

3. **ORDER OF THE COURT OF COMMON COUNCIL**

To receive the Order of the Court of Common Council appointing the Board, dated 27<sup>th</sup> of April 2023.

*To follow.*

**For Information**

4. **ELECTION OF CHAIR**

To elect a Chair in line with Standing Order 29.

**For Decision**

5. **ELECTION OF DEPUTY CHAIR**

To elect a Deputy Chair in line with Standing Order 30.

**For Decision**

6. **MINUTES**

To approve the public minutes and non-public summary of the previous meeting of the City of London Police Authority Board held on the 22<sup>nd</sup> of March.

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

7. **OUTSTANDING REFERENCES**

Joint report of the Town Clerk and Commissioner.

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

8. **CITY OF LONDON POLICE AUTHORITY BOARD'S COMMITTEES AND APPOINTMENTS**

Report of the Town Clerk.

**For Decision**  
(Pages 13 - 40)

9. **CITY OF LONDON POLICE (COLP) MUSEUM- UPDATE**  
Report of the Commissioner.

**For Information**  
(Pages 41 - 44)

10. **BARONESS CASEY REVIEW**  
Report of the Commissioner.

**For Information**  
(Pages 45 - 64)

11. **ANNUAL REVIEW OF POLICE COMPLAINTS ACTIVITY - 2021/22**  
Report of the Town Clerk.

**For Information**  
(Pages 65 - 84)

12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

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

14. **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 on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

**For Decision**

## **Part 2 - Non-Public Agenda**

15. **NON-PUBLIC MINUTES**  
To approve the non-public minutes of the previous meeting of the City of London Police Authority Board held on the 22<sup>nd</sup> of March.

**For Decision**  
(Pages 85 - 88)

16. **NON-PUBLIC OUTSTANDING REFERENCES**  
Joint Report of the Town Clerk and Commissioner.

**For Information**

17. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**
  
18. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE BOARD AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

## CITY OF LONDON POLICE AUTHORITY BOARD Wednesday, 22 March 2023

Minutes of the meeting of the City of London Police Authority Board held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Wednesday, 22 March 2023 at 10.00 am

### Present

#### Members:

Deputy James Thomson (Chair)  
Tijs Broeke (Deputy Chair)  
Caroline Addy  
Helen Fentimen  
Alderman Timothy Hailes  
Deborah Oliver  
Deputy Graham Packham  
Dawn Wright  
Melissa Collett (External Member)  
Andrew Lentin (External Member)  
Michael Mitchell (External Member)

#### Officers:

Ian Thomas	- Town Clerk and Chief Executive
Bob Roberts	- Deputy Town Clerk
Richard Holt	- Town Clerk's Department
Richard Riley	- Police Authority Director
Oliver Bolton	- Police Authority
Josef Shadwell	- Police Authority
Charles Smart	- Police Authority
Tanna Chandni	- Town Clerk's Department
Caroline Al-Beyerty	- The Chamberlain
Paul Chadha	- Comptroller and City Solicitor's Department
Ian Hughes	- Environment Department

#### City of London Police:

Angela McClaren	- Commissioner, City of London Police
Paul Betts	- Assistant Commissioner, City of London Police
Peter O'Doherty	- Assistant Commissioner, City of London Police
Umer Khan	- Commander, City of London Police
Alix Newbold	- City of London Police
Alistair Cook	- CFO City of London Police
Aga Watt	- City of London Police

#### 1. APOLOGIES

Apologies were received from Sir Craig Mackey.

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

There were no declarations made.

3. **MINUTES**

The Board considered the public minutes of the previous meeting held on the 15<sup>th</sup> of February 2023.

The Board were informed of one correction to add the attendance of the Town Clerk.

**RESOLVED**– That, subject to the correction specified, the minutes of the meeting of the Police Authority Board held on 15<sup>th</sup> of February are approved as an accurate record.

4. **OUTSTANDING REFERENCES**

The Committee considered a report of the Town Clerk which set out Outstanding References from previous meetings of the Committee.

The Chair requested that a date for completion be added to each of the actions listed and that a review of the Police Authority governance be prepared for the next meeting of the Board.

**RESOLVED** – That the Committee notes the report.

5. **PUBLIC DRAFT MINUTES OF THE STRATEGIC PLANNING AND PERFORMANCE COMMITTEE**

The Board received the public minutes of the Strategic Planning and Performance Committee meeting held on the 6<sup>th</sup> of February 2023.

The Board were informed that Deborah Oliver and Helen Fentimen attendance would be added to the draft minutes.

**RESOLVED**- That the draft minutes be noted.

6. **CHAIR'S PUBLIC UPDATE**

The Board received the Chair's public update.

The Chair highlighted the publication by the Home Office of the Strategic Policing Requirement and noted the inclusion of both the policing of violence against women and girls and fraud observing that the City of London Police were one of two forces specifically named in the document.

The Chair informed the Board that he attended a recently held inclusion event organised by the Force and highlighted the need to make the Force the most inclusive in the country.

The Chair also highlighted to Members that the Board would be considering the appointment of its committees for the new civic year and requested Members consider which of these they may wish to serve on.

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

7. **COMMISSIONER'S UPDATE**

The Board received the Commissioner's public update.

The Commissioner updated the Board on the Baroness Casey Review of the Metropolitan Police including the implications for the City of London Police. It was noted that a detailed engagement with the Baroness Casey Review would be presented to Board at a future meeting. The Chair commented that whilst the Review was not a reflection of the City of London Police its findings needed to be considered by all Forces. In addition, it was highlighted that the City of London Police Authority already had established a more direct oversight of these issues as the Professional Standards and Integrity Committee had a sight of all Force misconduct data. It was added that work on culture at the Force needed to be ongoing. The Town Clerk added that Baroness Casey was due to speak at a London Councils meeting where the implications for London would be explained.

Following Member's query it was confirmed that the Metropolitan Police were leading on communications regarding the Baroness Casey Review that this stage.

The Board were updated on the City of London Police Museum noting that a report on the planned reinstatement would be presented to the Board at the next meeting.

Officers provided the Board with an update on the matter of phone snatching in the City of London including actions taken by the Force to combat these crimes.

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

8. **REFRESH OF THE COLP POLICING PLAN 2022- 2025 (FOR 2023-24)**

The Board considered a report of the Commissioner regarding the Refresh of the City of London Police Policing Plan 2022-25 for 2023-34.

The Chair noted the extensive consultation and engagement plan which had been undertaken on the Policing Plan with the Authority and highlighted the inclusion of reference to the Strategic Policing Requirement.

**RESOLVED-** That the refreshed Policing Plan be approved for publication.

9. **ANTI-TERRORISM TRAFFIC REGULATION ORDER**

The Board considered a report of the Executive Director Environment on the Anti-Terrorism Traffic Regulation Order.

**RESOLVED-** That the continuation of the ATTRO be approved subject to a further review in three years' time.

10. **INDEPENDENT ADVISORY SCRUTINY GROUP- REVIEW OF ARRANGEMENTS**

The Board received a report of the Commissioner on the Review of arrangements for the Independent Advisory Scrutiny Group.

The Board discussed whether the format and structure of the group provided an effective basis for engagement. Following a Member's query the background of the Group and its structure were confirmed. Further to this discussion the Board instructed Officers to review the recruitment and governance of this Group with the Force's Trust and Professionalism Team with a view to bringing an update back to Board later in the year (November/ December) to outline what is and what is not working with the new arrangements.

It was agreed that members of the Group be invited to observe a meeting of the Police Authority Board.

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

11. **HMICFRS INSPECTIONS UPDATE- VETTING, MISCONDUCT, AND MISOGYNY IN THE POLICE AND COLP COUNTER CORRUPTION AND VETTING INSPECTION**

The Board received a report of the Commissioner on the HMICFRS Inspections Update- Vetting, misconduct, and misogyny in the police and CoLP Counter Corruption and Vetting Inspection.

It was noted that the Professional Standards and Integrity Committee would reviewing a more detailed update on HMICFRS Inspections in May 2023.

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

12. **ANNUAL REVIEW OF POLICE COMPLAINTS ACTIVITY 2021/22**

The report was withdrawn.

The Police Authority Director explained that the report was not in position to be presented to the Board in time for the meeting but would be provided to the next meeting of the Board.

Responding to a query from the Town Clerk it was explained that comparative data on complaints was difficult to confirm due to factors including the COVID Pandemic and changing IOPC framework. It was requested that the Review, once finalised, include lessons learnt from previous years of complaints and that these be incorporated in future quality assurance.

**RESOLVED-** That the report withdrawn.

13. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

A Member raised the matter of the poor behaviour of e-scooter users in the City of London and asked what actions the Force were taking to combat this. Officers provided an update on these actions including Operation Hornet relating to cyclist and e-scooters. The Chair noted that the performance data regarding this would be considered by the Strategic Planning and Performance Committee with cluster meetings would be the best place for further discussion. The Chair of the Streets and Walkways Sub-Committee informed the Board that the Planning and Transportation Committee were determined to tackle this issue.

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



The Police Authority Board approved the appointment of James Halkett to the City of London Police Pensions Board on the recommendation of the Board's Chairman.

15. **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 on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

<b>Item No.</b>	<b>Paragraph(s) in Schedule 12A</b>
16-25 (excluding 20)	3
20	4

16. **NON-PUBLIC MINUTES**

The Board considered the non-public minutes of the previous meeting held on the 15<sup>th</sup> of February 2023.

**RESOLVED** – That non-public the minutes of the meeting of the Police Authority Board held on 15<sup>th</sup> of February are approved as an accurate record.

17. **NON-PUBLIC OUTSTANDING REFERENCES**

The Board received a joint report of the Town Clerk and Commissioner on the non-public actions from the last meeting of the Board.

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

18. **CHAIR'S NON-PUBLIC UPDATE**

The Board received the non-public update from the Chair.

**RESOLVED-** that the update be noted.

19. **COMMISSIONER'S UPDATES**

The Board received the non-public update from the Commissioner.

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

20. **COLP CORPORATE SERVICES REVIEW- UPDATE**

The Board received a report of the Commissioner which updated on the City of London Police Services Review.

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

21. **UNIFORM MANAGED SERVICE FOR CITY OF LONDON POLICE VIA THE NUMS - CONTRACT EXTENSION**

The Board received a report of the Commissioner on the Uniformed Managed Service for City of London Police Contract Extension.

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

22. **NPCC CYBERCRIME PROGRAMME: BLOCKCHAIN FORENSICS INVESTIGATION SAAS PROCUREMENT**

The Board considered a report of the Commissioner on the NPCC Cybercrime Programme Blockchain forensics investigation SaaS Procurement.

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

23. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

There were no questions.

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

There were no items of urgent business.

25. **CONFIDENTIAL MINUTES**

**The Board considered the confidential minutes of the previous meeting held on the 15<sup>th</sup> of February 2023.**

**RESOLVED –** That confidential the minutes of the meeting of the Police Authority Board held on 15<sup>th</sup> of February be approved as an accurate record.

**The meeting ended at 11:40**

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Chair

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

## City of London Police Authority Board – Public Outstanding References

18/2022/P	Item 8 Annual Review of Terms of Reference	It was confirmed that the Board's handbook which would be updated ready for the beginning of the new civic year in April.	Town Clerk/Police Authority	Completion date: 2 May 2023 A draft of the handbook is being finalised. On track for circulation to PAB following its 2 May meeting.
1/2023/P	Item 4 Public Outstanding References	The Deputy Chair requested that a regular update report dealing with all of the HMICFRS inspections (Ref: Misogyny, misconduct, vetting and CCU) should be provided to the Professional Standards and Integrity Committee and the Police Authority Board.	Commissioner of Police	Completion date: 9 <sup>th</sup> May 2023 This update is being provided to the next PSIC on the 9 <sup>th</sup> May 2023.
2/2023/P	Item 4 Outstanding References	Following the Board's discussion on this the Director of the Police Authority confirmed that a streamlined governance process would be established for considering the extension of CCTV coverage in the Barbican estate	Director of the Police Authority	Completion date: by 24 May 2023 Discussions initiated with the Corporate Programme Office. Process to be finalised ahead of the next PAB meeting on 24 May.
4/2023/P	Item 16 Protect Duty (Martyn's Law) Update	It was confirmed that a once full details of the Force and Corporation's responsibilities under Protect Duty were confirmed a detailed plan would be provided on how best to resource and delivery these responsibilities.	Commissioner/ Director of Police Authority	Completion date: TBC - dependent upon HMG. In Progress- the Home Secretary recently announced to the House of Commons that draft legislation for the Protect Duty (Martyn's law) will be published "in the spring", with a Bill introduced after that "as

				soon as Parliamentary time allows.” Home Sec also confirmed that there will be a lead-in time before the provisions are brought into force to allow for organisations covered by the Bill to prepare.
5/2023/P	Item 7 Commissioner’s update	It was noted that a detailed engagement with the Baroness Casey Review would be presented to Board at a future meeting.	Commissioner	Completion date: 2 <sup>nd</sup> May 2023 Complete: This report is on the agenda for this PAB on the 2 <sup>nd</sup> May.
6/2023/P	Item 10 Independent Advisory Scrutiny Group- Review of Arrangements	Chair of PAB asked to have an update back later in the year ( November/December) to see what has worked and what has not worked, with the new arrangements with IASG and Professionalism and Trust		Completion date: November/ December 2023 In Progress- the new arrangements are embedding, and an update will be brought back as requested.

# Agenda Item 8

<b>Committee(s)</b> City of London Police Authority Board	<b>Dated:</b> 02/05/2023
<b>Subject:</b> City of London Police Authority Board's Committees and Appointments	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	3, 8 & 10
<b>Does this proposal require extra revenue and/or capital spending?</b>	N
<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> Deputy Town Clerk	<b>For Decision</b>
<b>Report author(s):</b> Richard Holt, Governance Officer.	

## Summary

This report seeks the approval of the Police Authority Board for a number of recommendations in relation to its meetings, committees and their composition.

First, the Board are invited to agree whether the frequency of meetings of the Board and its Committees (**Appendix 1**) is appropriate.

Second, the Board is asked to consider the appointment of its Committees. This process includes agreeing the terms of reference, membership and the appointment of Chairs and Deputy Chairs (**Appendix 2**). Proposals also include the confirmation of role descriptions (**Appendix 3**).

The Board is also asked to consider its nomination rights to a number of other Committees and bodies.

## Recommendation(s)

The Board is asked to:

- Agree on the frequency of meetings of the Board and its Committees as per **Appendix 1**.
- Appoint the Board's Committees and their respective Chairs and Deputy Chairs as per paragraphs 7a-e and **Appendix 2**.
- Approve the Chair, Deputy Chair, Member, External Member and Committee Member role descriptions at **Appendix 3**.
- Consider nominations to other bodies.

## Main Report

### Current Position

1. As the meeting on the 2<sup>nd</sup> of May is the first meeting of the new civic year, the Board is invited to agree the frequency of its meetings, appoint its Committees, and make the appointments to other bodies for the year ensuing.
2. Following review of the Special Interest Area Scheme in 2022 the Board agreed to revise this scheme with only one role remaining in place: that of Safeguarding and Public Protection (Vulnerability and ICV Scheme).

### Proposals

3. **Frequency of Meetings.** Currently the Board meets monthly, with the exception of the recess periods. Members are invited to consider whether they wish to maintain this frequency of monthly Board meetings and quarterly frequency of Committee meetings or propose a different frequency (**Appendix 1**).
4. Members are invited to review the various terms of reference of the Board's Committees as set out at **Appendix 2**.

#### **Appointment of Committees and Co-Opted Members.**

5. Following the recommendations of Lord Lisvane as part of his review of City of London Corporation governance, Members requested that the Town Clerk develop role descriptions and person specifications for Members of the Board and its Committees. These were approved in April 2021 and are provided at **Appendix 3 for Members' views**.
6. Committee Membership from 2022/23 is provided for the Board's information in **Appendix 4**. The recommendations regarding Committees, Working Parties, SIA and other bodies are as follows:
  - a. **Economic & Cyber Crime Committee (ECCC)**
    - i. Approve its terms of reference and composition as proposed in **Appendix 2**.
    - ii. Appoint up to six Members of the Board (in addition to the Chair and Deputy Chair) to serve on the Committee.
    - iii. Note the inclusion of the appointment of the Chair of Policy & Resources Committee to the ECCC.
    - iv. Note the responsibility for the Policy & Resources Committee to appoint a further one of its Members to the ECCC.
    - v. Note that following the Board meeting, expressions of interest for the two Co-Opted Members of the Court of Common Council will be sought, with appointments to be made at the next meeting of the Board.
    - vi. Appoint a Chair and Deputy Chair for 2023/24.

**b. Strategic Planning & Performance Committee (SPPC)**

- i. Approve the terms of reference for the SPPC as proposed in **Appendix 2**.
- ii. Appoint up to six Members of the Board (in addition to the Chair and Deputy Chair) and two external members.
- iii. Note that following the Board meeting, expressions of interest for the two Co-Opted Members of the Court of Common Council will be sought, with appointments to be made at the next meeting of the Board.
- iv. Appoint a Chair and Deputy Chair for 2023/24.

**c. Resource, Risk & Estates Committee (RREC)**

- i. Approve the terms of reference for the RREC as proposed in **Appendix 2**.
- ii. Appoint up to six Members of the Board (in addition to the Chair and Deputy Chair) and two external members.
- iii. Note the responsibility for the Audit & Risk Management Committee to Co-Opt one to the RREC.
- iv. Note that the Chairman of the Finance Committee, or their nominee, will have a place on the RREC.
- v. Note that following the meeting, expressions of interest for the two Co-Opted Members of the Court of Common Council will be sought, with appointments to be made at the next meeting of the Board.
- vi. Appoint a Chair and Deputy Chair for 2023/24.

**d. Professional Standards & Integrity Committee**

- i. Approve its terms of reference as proposed in **Appendix 2**.
- ii. Appoint up to six Members of the Board (in addition to the Chair and Deputy Chair) and two external members.
- iii. Note that following the Board meeting, expressions of interest for the two Co-Opted Members of the Court of Common Council will be sought, with appointments to be made at the next meeting of the Board.
- iv. Appoint a Chair and Deputy Chair for 2023/24.

**e. City of London Police Pensions Board**

- i. To appoint the Chair and Deputy Chair.
- ii. Endorse the terms of reference at **Appendix 2**.

7. **Appointments to other Bodies.** Members are asked to consider the following appointments for 2023/24.
- i. **Streets and Walkways Sub (Planning and Transportation) Committee** – One Member. Previously Deputy Graham Packham.
  - ii. **Digital Services Committee** (formerly the Digital Services Sub (Finance) Committee) – The Chairman, or their nominee. One Member. Previously Dawn Wright.
  - iii. **Homelessness and Rough Sleeping Sub (Community and Children’s Services) Committee** – Up to two Members. Previously Tijs Broeke and Munsur Ali.
- a. To note that Deputy James Thomson is currently an **Association of Police and Crime Commissioners** (APCC) Board Member and that this appointment is made by the APCC Board.
  - b. Note the appointment of the Chair and Deputy Chair of the Board, or their nominees to the **Capital Buildings Board**.
  - c. Note the appointment of the Chair and Deputy Chair of the Board (or their representatives) to the **Crime and Disorder Scrutiny Committee**.
8. **Appointment** of one Member to serve as the Member Lead for Safeguarding and Public Protection (Vulnerability and ICV Scheme). Currently Deborah Oliver

## Appendices

- **Appendix 1** – 2023 Schedule of City of London Police Authority Board meetings (and its Committees)
- **Appendix 2** – Draft Terms of Reference for the City of London Police Authority Board Committees
- **Appendix 3** – Role Descriptions
- **Appendix 4** – 2022/23 Committee Membership

**Richard Holt**  
Governance Officer  
Town Clerk’s Department

E: [Richard.Holt@cityoflondon.gov.uk](mailto:Richard.Holt@cityoflondon.gov.uk)



## **Appendix 1: Schedule of City of London Police Authority Board and Committee Meetings 2023**

### **City of London Police Authority Board meetings 2023 (11)**

25 January  
15 February  
22 March  
2 May  
24 May  
28 June  
19 July  
20 September  
25 October  
22 November  
13 December

### **Economic and Cyber Crime Committee meetings 2023 (4)**

27 January  
11 May  
8 September  
9 November

### **Strategic Planning and Performance Committee meetings 2023 (4)**

6 February  
3 May  
5 September  
13 November

### **Resource Risk and Estates Committee meetings 2023 (4)**

1 February  
22 May  
6 September  
1 November

### **Professional Standards & Integrity Committee meetings 2023 (4)**

8 February  
9 May  
15 September  
7 November

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## **Economic and Cyber Crime Committee Composition**

- Up to six Members of the Police Authority Board appointed by the Police Authority Board (in addition to the Chair and Deputy Chair of the Board).
- Up to two co-opted Court of Common Council Members to be appointed by the Police Authority Board.
- Chair and one other Member of the Policy and Resources Committee, to be appointed by that Committee.
- Up to two external Members, to be appointed by the Police Authority Board.

## **Frequency of meetings**

The Committee shall meet four times per annum.

## **Quorum**

Three Members (of which at least two must be Common Councillors).

## **Terms of Reference**

To be responsible for:

- a) overseeing the force's national responsibilities for economic, fraud and cyber crime, having regard to the strategic policing requirement and relevant national strategies in this area;
- b) monitoring government, and other external agencies' policies and actions relating to economic and cyber crime;
- c) overseeing the delivery of the City's economic and cyber crime strategies, programmes, projects and other relevant improvement plans including (but not limited to) the National Lead Force Plan, Strategic Communications and Engagement Plan, NPCC Cyber Crime Programme, Cyber Griffin and Fraud and Cyber Reporting & Analysis Service Programme;
- d) overseeing the City of London Police's private sector partnerships with regard to fraud, economic and cyber crime;
- e) identifying and overseeing opportunities to exploit the synergies between the Corporation's Cyber Security agenda and that of the City of London Police;
- f) overseeing the business strategy, service and financial performance of the Economic and Cyber Crime Academy;
- g) making recommendations to the Police Authority Board in any other matters relating to economic and cyber crime.

## **Professional Standards and Integrity Committee**

### **Composition**

- Up to six Members of the Police Authority Board appointed by the Police Authority Board, in addition to the Chair and Deputy Chair.
- Up to three co-opted Common Council Members to be appointed by the Police Authority Board
- Two external co-opted Members, to be appointed by the Police Authority Board.

### **Frequency of meetings**

The Committee shall meet four times per annum.

### **Quorum**

Three Members (of which at least two must be Common Councillors).

### **Terms of Reference**

*To be responsible for:*

- a) overseeing implementation of City of London Police's Professionalism and Trust strategy and related action plans including tackling violence against women and girls, improving professional conduct and measures to rebuild community confidence in policing;
- b) overseeing implementation of City of London Police's Equality and Inclusion Strategy and action plan and monitoring of workforce diversity data and measures to promote equality, diversity and inclusion;
- c) overseeing the handling of complaints and the maintenance of professional standards across the force including acceptance of gifts and hospitality, and where necessary recommending changes in procedures and performance to the Police Authority Board;
- d) scrutinising use of stop and search and use of force to ensure powers are being used proportionately and correct procedures are followed;
- e) monitoring the City of London Police's handling of misconduct cases and related organisational learning;
- f) monitoring government, police authorities and other external agencies' policies and actions relating to good practice in professional standards and advising the Police Authority Board or Commissioner as appropriate;
- g) overseeing the work of the City of London Police Integrity Standards Board, whose purpose is to direct and coordinate the auditing of the key indicators in relation to the City of London Police Integrity Dashboard, delivery of associated action plans and promoting the understanding of the Police Code of Ethics;

- h) the determination of reviews of police complaints submitted to the City of London Police Authority, with a Review Panel composed of at least three Members of the Committee.

## **Resource, Risk and Estates Committee**

### **Composition**

- Up to six Members of the Police Authority Board appointed by the Police Authority Board, in addition to the Chair and Deputy Chair;
- One co-opted Member to be appointed by the Audit and Risk Management Committee; and
- Up to two co-opted Members of the Court of Common Council to be appointed by the Police Authority Board.
- The Chair of Finance Committee or their nominee.
- Up to two external independent members, to be appointed by the Police Authority Board.

### **Frequency of meetings**

- The Committee shall meet four times per annum.

### **Quorum**

Three Members (of which at least two must be Common Councillors).

### **Terms of Reference**

*To be responsible for:*

- a) monitoring and challenging City of London Police's use of resources to deliver its strategic priorities efficiently and effectively
- b) overseeing City of London Police's financial management including monitoring in-year financial performance against revenue and capital budgets, scrutiny of proposed revenue and capital budgets and the Medium Term Financial Plan;
- c) overseeing the City of London Police's human resource management including strategic workforce planning and establishment strength;
- d) overseeing commercial projects and major change programmes and scrutinising capital spend and other investment to ensure value for money;
- e) monitoring the corporate risks and mitigations of the City of London Police and Police Authority;
- f) scrutinising internal audit reporting and implementation of recommendations; and
- g) scrutinising police estates strategy requirements to ensure effective delivery of services that meet community needs.

## **Strategic Planning and Performance Committee**

### **Composition**

- Up to six Members of the Police Authority Board appointed by the Police Authority Board, in addition to the Chairman and Deputy Chairman;
- Up to two co-opted Court of Common Council Members to be appointed by the Police Authority Board.
- Up to two external independent members, to be appointed by the Police Authority Board.

### **Frequency of meetings**

The Committee shall meet four times per annum.

### **Quorum**

Any three members (at least two of which must be Common Councillors).

### **Terms of Reference**

*To be responsible for:*

#### ***Policing Plan and Performance***

- a) overseeing delivery of the City of London Policing Plan aims and objectives including how the vision, values, priorities and cultural principles are being engrained;
- b) monitoring and scrutinising performance against the Policing Plan priorities, taking into account the Strategic Policing Requirement, acknowledging success and challenging areas of concern;
- c) receiving reports and presentations on strategic priorities and areas of particular interest and/or concern to the police authority and local communities;
- d) reviewing and challenging the effectiveness of City of London Police's community engagement and partnership working arrangements to address the root causes of crime and policing demand (including the Safer City Partnership)
- e) monitoring government, policing bodies and other external agencies' policies, actions and good practice relating to police performance and advising the Police Authority Board or Commissioner as appropriate; and
- f) monitoring of HMICFRS inspections, reporting and implementation of recommendations ensuring any areas for improvement are addressed;

## City of London Police Pensions Board

### Composition

- A Chair and Deputy Chair appointed by the Scheme Manager<sup>1</sup>
- The Chair and Deputy Chair shall not both be Employer representatives<sup>2</sup> or Member representatives<sup>3</sup>
- At least four, and no more than twelve, voting Members appointed by the Chair with Scheme Manager approval
- An equal number of Employer representatives and Member representatives shall be appointed to the Board
- The Chair may appoint, with Scheme Manager approval, up to four independent<sup>4</sup>, non-voting Members to the Board

### Terms of Reference

In line with the requirements of the Public Services Pensions Act 2013 and the Police Pensions Regulations 2015 for the management of the City of London Police's Pension Scheme, to be responsible for assisting the Scheme Manager (the City of London Police) in the following matters:

- a) Securing compliance with the scheme regulations and other legislation relating to the governance and administration of the scheme and any statutory pension scheme that it is connected to with
- b) Securing compliance with requirements imposed in relation to the scheme and any connected scheme by the Pensions Regulator in relation to the Scheme, or any statutory pension scheme that is connected with it; and
- c) The performance of the scheme manager's functions under the Police Pensions Regulations 2015

<sup>1</sup> The Scheme Manager for the City of London Police Force (except the Commissioner) is the Commissioner of the City of London Police (Regulation 7 of Police Pension Regulations). The Scheme Manager for the Commissioner of Police is the Court of Common Council. The functions in relation to both to be delegated to the Police Authority Board (Regulation 11(2) of the Police Pension Regulations).

<sup>2</sup> An Employer representative is a person appointed to the Board for the purpose of representing employer for the scheme.

<sup>3</sup> A Scheme Member representative is a person appointed to the Board for the purpose of representing members of the scheme.

<sup>4</sup> An Independent Member is a person who is neither an employer representative nor a member representative.



- d) Other such matters as the scheme regulations may specify.

**Quorum**

- Three Members, with at least one Employer Representative and one Scheme Member representative present.

**Frequency of Meetings**

- Three times per year

**Terms**

- Board Members are appointed to three 4-year terms (total 12 years).

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## **Chair of the City of London Police Authority Board – Role Profile**

Appointment	Elected annually by the Members of the Police Authority Board for a term up to a maximum of four years.
Overall Responsibilities	<ul style="list-style-type: none"><li>• To provide day-to-day leadership on behalf of the Police Authority Board in its work with the City of London Police.</li><li>• To be the key spokesperson for the Police Authority on matters relating to policing and crime.</li><li>• To chair the Police Authority Board.</li></ul>
Time Commitment	<ul style="list-style-type: none"><li>• Chairing up to 12 Police Authority Boards per year.</li><li>• Attending Police Authority Board Committees as appropriate.</li><li>• Ex-officio Member of Policy &amp; Resources Committee.</li><li>• Regular meetings with Commissioner and Police Authority Chief Executive.</li><li>• Undertaking a regular engagement programme with the Force and key stakeholders on behalf of the Police Authority Board.</li></ul>

### **Background**

The role of the City of London Police Authority is to provide scrutiny and challenge to the work of the City of London Police (CoLP). In discharging more than 60 statutory duties, the Police Authority must ensure that CoLP delivers efficient and effective policing for the public within a sustainable medium-term financial plan (MTFP), and hold the City of London Police Commissioner to account for the delivery of policing within the Square Mile and in its capacity as the national lead force for economic crime as set out in the Policing Plan.

The City is exceptional in retaining a police authority in the form of the Court of Common Council, acting through the City of London Police Authority Board to which the Common Council has delegated its general functions. The Police Authority Board provides a directly elected scrutiny body mirroring the model deployed for Police & Crime Commissioners (PCCs). In fulfilling its role, the Police Authority Board must be mindful of public confidence in policing, ensure the Force provides value for money, and that the needs of local communities are met as effectively as possible by CoLP.

### **Key Responsibilities**

On behalf of the Police Authority Board, the Chair has the following responsibilities:

- to provide political leadership to the Force on behalf of the Police Authority, including day-to-day oversight of the Force's strategic priorities as set out in the Policing Plan;
- to be responsible for the totality of policing in the City of London;
- to hold the Police Commissioner to account, ensuring the Force is accountable to the communities they serve;

- to ensure the Police Authority Board discharges its responsibilities for monitoring and challenging crime performance, the efficiency and effectiveness of the Force, and the provision of value for money;
- to ensure that our local communities needs are identified, considered and met as effectively as possible by facilitating and enhancing relationships between the Force and its local stakeholders;
- to work in partnership with a range of agencies at a local and national level, ensuring there is a unified approach to preventing and reducing crime in the City of London;
- to bring together community safety and criminal justice partners to make sure local priorities are coordinated to support the Force;
- to act as the key spokesperson for the City of London Corporation in its capacity as the Police Authority for the City of London, helping to raise the profile of the City's contribution in preventing and tackling crime;
- to act as the Police Authority's principal point of contact at a local, regional and national level in matters relating to policing and crime, particularly the Home Office, HMICFRS, Association of Police and Crime Commissioners (APCC);
- to represent the Police Authority Board at APCC meetings and, subject to nomination, to act as a portfolio holder or as a member of the APCC Board;
- to chair the appointment panel for the post of Commissioner on behalf of the Court of Common Council;
- to contribute to the annual performance development review of the Police Commissioner;
- to uphold and promulgate the Police Authority Board's policy statements, including on financial assurance and diversity and inclusion.
- to lead otherwise the work of the Police Authority Board and make sure it carries out its business according to its terms of reference.

## **Deputy Chair of the City of London Police Authority Board – Role Profile**

Appointment	Elected annually by the Members of the Police Authority Board for a term up to a maximum of four years (typically including a year if stepping down as Chair).
Overall Responsibilities	<ul style="list-style-type: none"><li>• To assist and work with the Chair of the Police Authority Board to provide day-to-day leadership on behalf of the Police Authority Board in its work with the City of London Police.</li><li>• To deputise for the Chair where appropriate.</li></ul>
Time Commitment	<ul style="list-style-type: none"><li>• Attending 12 Police Authority Boards per year.</li><li>• Attending Police Authority Board Committees as appropriate.</li><li>• Monthly meetings with the Commissioner and Police Authority Chief Executive.</li></ul>

### **Background**

The role of the City of London Police Authority is to provide scrutiny and challenge to the work of the City of London Police (CoLP). In discharging more than 60 statutory duties, the Police Authority must ensure that CoLP delivers efficient and effective policing for the public within a sustainable medium-term financial plan (MTFP), and hold the City of London Police Commissioner to account for the delivery of policing within the Square Mile and in its capacity as the national lead force for economic crime as set out in the Policing Plan.

The City is exceptional in retaining a police authority in the form of the Court of Common Council, acting through the City of London Police Authority Board to which the Common Council has delegated its general functions. The Police Authority Board provides a directly elected scrutiny body mirroring the model deployed for Police & Crime Commissioners (PCCs). In fulfilling its role, the Police Authority Board must be mindful of public confidence in policing, ensure the Force provides value for money, and that the needs of local communities are met as effectively as possible by CoLP.

### **Key Responsibilities**

On behalf of the Police Authority Board, the Deputy Chair has the following responsibilities:

- to assist the Chair of the Police Authority Board in providing political leadership to the Force on behalf of the Police Authority, including day-to-day oversight of the Force's strategic priorities as set out in the Policing Plan;
- to assist the Chair of the Police Authority Board with their key responsibilities, including:
  - to hold the Police Commissioner to account on a day-to-day basis, ensuring the Force is accountable to the communities they serve;
  - to ensure the Police Authority Board discharges its responsibilities for monitoring and challenging crime performance, the efficiency and effectiveness of the Force, and the provision of value for money;

- to ensure that our local communities needs are identified, considered and met as effectively as possible by facilitating and enhancing relationships between the Force and its local stakeholders;
- to develop a particular interest in key areas of the Force's activities, including neighbourhood policing and road safety (and casualty reduction), working closely with relevant officers in the Force, Police Authority and City Corporation to identify opportunities for collaboration and partnership working;
- to deputise for the Chair in their absence from Police Authority Board meetings and, where necessary, to carry out the requirements of their role profile during a period of sustained absence;
- to carry out any other duties considered necessary to support the work of the Police Authority Board in accordance with its terms of reference.

### **Chair of a City of London Police Authority Board (sub) Committee – Role Profile**

Appointment	Elected annually by the Members of the Police Authority Board for a term up to a maximum of four years.
Overall Responsibilities	<ul style="list-style-type: none"><li>• To provide political leadership to the Force on behalf of the Police Authority Board in the areas covered by the given Committee’s terms of reference;</li><li>• To act as a point of contact on behalf of the Police Authority with partner organisations in matters relating to the Committee’s terms of reference;</li><li>• To chair the Committee, reporting back to the Police Authority Board on its work.</li></ul>
Time Commitment	<ul style="list-style-type: none"><li>• Chairing 4 Committee meetings per year.</li><li>• Attending Police Authority Board as appropriate.</li><li>• Discharging Special Interest Area responsibilities as appropriate.</li><li>• Regular meetings with Force Chief Officers responsible for the areas covered by the given Committee’s terms of reference.</li></ul>

#### **Background**

The role of the City of London Police Authority is to provide scrutiny and challenge to the work of the City of London Police (CoLP). In discharging more than 60 statutory duties, the Police Authority must ensure that CoLP delivers efficient and effective policing for the public within a sustainable medium-term financial plan (MTFP), and hold the City of London Police Commissioner to account for the delivery of policing within the Square Mile and in its capacity as the national lead force for economic crime as set out in the Policing Plan.

The City is exceptional in retaining a police authority in the form of the Court of Common Council, acting through the City of London Police Authority Board to which the Common Council has delegated its general functions. The Police Authority Board provides a directly elected scrutiny body mirroring the model deployed for Police & Crime Commissioners (PCCs). In fulfilling its role, the Police Authority Board and its Committees must be mindful of public confidence in policing, ensure the Force provides value for money, and that the needs of local communities are met as effectively as possible by CoLP.

#### **Key responsibilities**

On behalf of the Police Authority Board, the Chair of one of its Committees has the following responsibilities:

- to provide political leadership to the Force on behalf of the Police Authority Board in the areas covered by the given Committee’s terms of reference;
- to act as a spokesperson for the City of London Corporation in its capacity as the Police Authority for the City of London in the areas covered by the given Committee’s terms of reference;

- to develop a particular interest in the policies that underpin the areas covered by the given Committee's terms of reference, working closely with officers in the Force, Police Authority and City Corporation to identify opportunities for collaboration and partnership working (building on the Police Authority's Special Interest Area (SIA) Scheme);
- to act as a point of contact on behalf of the Police Authority with partner organisations in matters relating to the Committee's terms of reference;
- to support the Force's engagement with agencies at local and national level in matters relating to the Committee's terms of reference, ensuring there is a unified approach to preventing and reducing crime;
- to report back to the Police Authority Board on the work of the Committee;
- to lead otherwise the work of the committee and make sure it carries out its business effectively and efficiently within its terms of reference.



## **Member of the City of London Police Authority Board – Role Profile**

Appointment	Appointed by the Court of Common Council for a term up to a maximum of four years. There is a maximum continuous service limit of three terms of four years.
Overall Responsibilities	<ul style="list-style-type: none"><li>• As a Member of the Police Authority Board to:<ul style="list-style-type: none"><li>○ To hold the Police Commissioner and the Force to account, ensuring the Force is accountable to the communities they serve.</li><li>○ To contribute proactively to the oversight and scrutiny of the Force’s strategic priorities as set out in the Policing Plan.</li><li>○ To monitor and challenge crime performance, the efficiency and effectiveness of the Force, and the provision of value for money.</li></ul></li></ul>
Time Commitment	<ul style="list-style-type: none"><li>• Attending 12 Police Authority Boards per year.</li><li>• Attending Police Authority Board (sub) Committees as appropriate.</li><li>• Undertaking Special Interest Area responsibilities as appropriate.</li></ul>

### **Background**

The role of the City of London Police Authority is to provide scrutiny and challenge to the work of the City of London Police (CoLP). In discharging more than 60 statutory duties, the Police Authority must ensure that CoLP delivers efficient and effective policing for the public within a sustainable medium-term financial plan (MTFP), and hold the City of London Police Commissioner to account for the delivery of policing within the Square Mile and in its capacity as the national lead force for economic crime as set out in the Policing Plan.

The City is exceptional in retaining a police authority in the form of the Court of Common Council, acting through the City of London Police Authority Board to which the Common Council has delegated its general functions. The Police Authority Board provides a directly elected scrutiny body mirroring the model deployed for Police & Crime Commissioners (PCCs). In fulfilling its role, the Police Authority Board and its Committees must be mindful of public confidence in policing, ensure the Force provides value for money, and that the needs of local communities are met as effectively as possible by CoLP.

### **Key Responsibilities**

The roles and responsibilities of a Police Authority Board Member through membership of, and participation at, meetings of the City of London Police Authority Board or its committees are as follows:

- to hold the Police Commissioner and the Force to account, ensuring the Force is accountable to the communities they serve;
- to contribute proactively to the oversight and scrutiny of the Force’s strategic priorities as set out in the Policing Plan;
- to monitor and challenge crime performance, the efficiency and effectiveness of the Force, and the provision of value for money;

- to be committed to the delivery of a fair and equitable policing service to all of our communities;
- to contribute proactively to the oversight and scrutiny of the Force's policies, strategies and service delivery;
- to make sure that the principles of equality and fairness are integral to all actions and policies of the Force;
- to participate in any committee, panel, or special interest area to which they are appointed on behalf of the Police Authority Board;
- to develop and maintain a working knowledge of the Force's and the City Corporation's services, management arrangements, powers, duties and resource constraints;
- to develop and maintain a good knowledge of the Policing Plan and the corporate polices of the City Corporation;
- to promote effective and efficient policing and establish constructive partnerships with the City of London Police and other relevant bodies;
- to adhere to the City Corporation's code of conduct and Seven Principles of Public Life.

**Guildhall,  
April 2021**

## **External Member of the Police Authority Board – Role Profile**

Appointment	Appointed by the Court of Common Council for a term up to a maximum of four years. There is a maximum continuous service limit of three terms of four years.
Overall Responsibilities	<ul style="list-style-type: none"><li>• As a member of the Police Authority Board to:<ul style="list-style-type: none"><li>○ To hold the Police Commissioner and the Force to account, ensuring the Force is accountable to the communities they serve.</li><li>○ To contribute proactively to the oversight and scrutiny of the Force’s strategic priorities as set out in the Policing Plan.</li><li>○ To monitor and challenge crime performance, the efficiency and effectiveness of the Force, and the provision of value for money.</li></ul></li></ul>
Time Commitment	<ul style="list-style-type: none"><li>• Attending 12 Police Authority Board meetings per year.</li><li>• Attending Police Authority Board Committees as appropriate.</li><li>• Undertaking Special Interest Area responsibilities as appropriate.</li></ul>

### **Background**

The role of the City of London Police Authority is to provide scrutiny and challenge to the work of the City of London Police (CoLP). In discharging more than 60 statutory duties, the Police Authority must ensure that CoLP delivers efficient and effective policing for the public within a sustainable medium-term financial plan (MTFP), and hold the City of London Police Commissioner to account for the delivery of policing within the Square Mile and in its capacity as the national lead force for economic crime as set out in the Policing Plan.

The City is exceptional in retaining a police authority in the form of the Court of Common Council, acting through the City of London Police Authority Board to which the Common Council has delegated its general functions. The Police Authority Board provides a directly elected scrutiny body mirroring the model deployed for Police & Crime Commissioners (PCCs). In fulfilling its role, the Police Authority Board and its Committees must be mindful of public confidence in policing, ensure the Force provides value for money, and that the needs of local communities are met as effectively as possible by CoLP.

### **Key Responsibilities**

The roles and responsibilities of a Police Authority Board External Member through membership of, and participation at, meetings of the City of London Police Authority Board or its committees are as follows:

- to hold the Police Commissioner and the Force to account, ensuring the Force is accountable to the communities they serve;
- to contribute proactively to the oversight and scrutiny of the Force’s strategic priorities as set out in the Policing Plan;
- to monitor and challenge crime performance, the efficiency and effectiveness of the Force, and the provision of value for money;

- to be committed to the delivery of a fair and equitable policing service to all of our communities;
- to contribute proactively to the oversight and scrutiny of the Force's policies, strategies and service delivery;
- to make sure that the principles of equality and fairness are integral to all actions and policies of the Force;
- to participate in any committee, panel, or special interest area to which they are appointed on behalf of the Police Authority Board;
- to develop and maintain a working knowledge of the Force's and the City Corporation's services, management arrangements, powers, duties and resource constraints;
- to develop and maintain a good knowledge of the Policing Plan and the corporate policies of the City Corporation;
- to promote effective and efficient policing and establish constructive partnerships with the City of London Police and other relevant bodies;
- to undertake any training and development deemed necessary by the City Corporation and Police Authority, providing feedback to the Police Authority Board where appropriate;
- to adhere to the City Corporation's code of conduct and Seven Principles of Public Life.

**Guildhall,  
April 2021**

## **Appendix 4: City of London Police Authority Board – Committee Memberships**

### **Economic and Cyber Crime Committee**

**Chair: James Thomson**

**Deputy Chair: Tijs Broeke**

Serial	Role	Member
1	Chair of PAB	James Thomson
2	Deputy Chair of PAB	Tijs Broeke
3	Board Member #1	Graham Packham
4	Board Member #2	Alderman Professor Emma Edhem
5	Board Member #3	Alderman Tim Hailes
6	Board Member #4	Andrew Lentin
7	Board Member #5	Dawn Wright
8	Board Member #6	Vacancy
8	Co-Opted Member #1	Alderman Bronek Masojada
9	Co-Opted Member #2	Jason Groves
10	Policy & Resources	Deputy Christopher Hayward
11	Policy & Resources	James Tumbridge
12	External Member #1	Michael Landau
13	External Member #2	Andrew Lentin

### **Strategic Planning and Performance Committee**

**Chair: Tijs Broeke**

**Deputy Chair: Andrew Lentin**

Serial	Role	Member
1	Chair of PAB	James Thomson
2	Deputy Chair of PAB	Tijs Broeke
3	Board Member #1	Caroline Addy
4	Board Member #2	Munsur Ali
5	Board Member #3	Alderman Tim Hailes
6	Board Member #4	Andrew Lentin
7	Board Member #5	Deborah Oliver
8	Board Member #6	Vacancy
8	Co-Opted Member #1	John Griffiths
9	Co-Opted Member #2	Vacant
10	External Member #1	Moawia Bin-Sufyan
11	External Member #2	Adrian Hanstock

### **Resource Risk and Estates Committee**

**Chair: Tim Hailes**

**Deputy Chair: Tijs Broeke**

Serial	Role	Member
1	Chair of PAB	James Thomson
2	Deputy Chair of PAB	Tijs Broeke
3	Board Member #1	Alderman Tim Hailes
4	Board Member #2	Andrew Lentin
5	Board Member #3	Graham Packham
6	Board Member #4	Dawn Wright
7	Board Member #5	Vacancy
8	Co-Opted Member #1	Vacancy
9	Co-Opted Member #2	Vacancy
10	Audit & Risk Management	Randall Anderson
11	Finance Committee	Randall Anderson
12	External Member #1	Adrian Hanstock
13	External Member #2	Michael Landau

### **Professional Standards and Integrity Committee**

**Chair: Caroline Addy**

**Deputy Chair: Deborah Oliver**

Serial	Role	Member
1	Chair of PAB	Deputy James Thomson
2	Deputy Chair of PAB	Tijs Broeke
3	Board Member #1	Caroline Addy
4	Board Member #2	Nick Bensted-Smith
5	Board Member #3	Alderman Professor Emma Edhem
6	Board Member #4	Deborah Oliver
7	Board Member #5	Vacancy
8	Board Member #6	Vacancy
9	Co-Opted Member #1	Florence Keelson-Anfu
10	Co-Opted Member #2	Jason Groves
12	External Member #1	Michael Mitchell
13	External Member #2	Alice Ripley

### **City of London Police Pensions Board**

Serial	Role	Member
1	Chairman	John Todd
2	Deputy Chairman	Alderman Alexander Barr

### **Streets and Walkways Sub (Planning and Transportation) Committee**

Serial	Member
1	Graham Packham

### **Digital Services Sub (Finance) Committee**

Serial	Member
1	Alderman Emma Edhem

**Homelessness and Rough Sleeping Sub (Community and Children's Services)  
Committee**

Serial	Member
1	Munsur Ali
2	

**Association of Police and Crime Commissioners**

Serial	Member
1	James Thomson

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# Agenda Item 9

<b>Committee(s):</b> Police Authority Board	<b>Dated:</b> 2 <sup>nd</sup> May 2023
<b>Subject:</b> City of London Police (CoLP) Museum- Update	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1- People are safe and feel safe
<b>Does this proposal require extra revenue and/or capital spending?</b>	<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 46-23	<b>For Information</b>
<b>Report author:</b> Gary Brailsford-Hart, Chief Data Officer	

## Summary

This paper provides an update to the overview provided to the January Police Authority Board (PAB) concerning the current situation following the closure of the City of London Police Museum during the pandemic.

There is now an opportunity to restore the Museum in August 2023.

## Recommendation

Members are asked to:

- Note the report.

## **Main Report**

### **Background**

1. Due to the closure of Wood Street Police Station, the City of London Police (CoLP) Museum was required to find a new location or be placed into long term storage. A Heritage Lottery Grant was applied for and awarded in 2015 which funded the move and redesign of the Museum to the Guildhall Complex, into the space previously occupied by the Horology Museum. The Museum enjoyed significant success at the new location with regular footfall and healthy and productive engagement with several schools regularly attending as part of the key stage programme.
2. During the Covid -19 pandemic a decision was taken to place the Police Museum into storage so that the space could be utilised as a Covid testing centre. This was arranged and managed as part of the Covid response fund with an assurance that the Museum would be restored once the immediate emergency had passed, and the space had served its purpose.
3. In 2022 the Culture and Heritage Department ceded the Museum space back to the City Surveyor stating that it was now surplus to their requirements

### **Current Position**

4. Since the update to your January PAB which outlined the options being explored, continued discussions with the City Surveyor established that the City of London Police Museum can be restored to the previously occupied space. We have established that there is no available funding from the original agreement to restore the Museum from storage due to the closure of the Covid fund and any restoration will have to be met from Police funds.
5. There is no allocated Police budget for the Museum. Any previous running costs have been met from police budgets and have been in the region of £5,000. The restoration costs are still being worked through.
6. The Chief Data Officer (CDO) has established from Guildhall Estates that there will be no ongoing costs for re-occupancy of the Museum space and therefore plans to continue to operate and meet incidental costs from their revenue budget.
7. Since the last report the CDO has met with the Director of New London Architecture (NLA), as they will be occupying the space adjacent to the Museum, the following has been agreed:
  - NLA will utilise the museum space as an office until 31<sup>st</sup> July 2023.
  - To facilitate an office NLA will need to remove the existing external vinyls and replace this with transparent London centre vinyls until 31<sup>st</sup> July 2023.
  - NLA will work with the police to replace any new vinyls as and when needed.

- NLA will vacate the premises on or before the 31<sup>st</sup> July 2023.
  - NLA and Police to work on an agreement for the operation of the space after this date to confirm a working partnership.
8. The CDO has obtained the details of the removal company originally used to place the museum into storage and is currently making the arrangements to restore the Museum in August 2023.
  9. The Culture, Heritage and Libraries Committee moved to have the Police Museum removed from their terms of reference at the March Policy and Resources Committee, but it was agreed that it would remain for the time being with PAB ToRs also to remain the same. If there is a further decision on this, the decision to make any change to ToRs will need to be taken by the Court of Common Council, on the recommendation of Policy & Resources Committee. Clearly, PAB may decide to recommend a change in the future.

### **Corporate & Strategic Implications**

10. Police museums open to the public are not commonplace and there are only 9 remaining across the country. The loss of police heritage has been identified as a risk by the NPCC and they have developed a dedicated heritage portfolio to review and provide guidance to support the continued heritage of UK policing, they have identified a maturity model to ensure *“The ability of a service to identify, preserve, protect and share police heritage for current and future generations.”*
11. The City of London has a proud heritage of Policing which can be traced back to the establishment of the City’s watchmen under the control of the two Sheriffs. Through the Police Museum we have been able to describe the journey from these early times to the modern day and provide a unique insight into the development of UK policing, the policing of nationally impactive events and how we are continuing to engage and police with the consent of the public.
12. With the support of Board we hope to continue telling the story of our history to current and future generations.

### **Other Implications**

13. The costs for restoration will be met from local police budgets and planning is taking place to ensure this is manageable.
14. It is recognised that there will be a requirement to refresh and re-energise the Museum volunteers after this extended period of closure and support from HR colleagues is being sought.

### **Conclusion**

15. The restoration of the Museum to its former location has been agreed, there is an opportunity to mutually support the ambitions of NLA and the Police Museum

through partnership working, the re-engagement and recruitment of volunteers will be advanced.

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**Contact:**

**Gary Brailsford-Hart**

Chief Data Officer

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<b>Committee(s):</b> Police Authority Board	<b>Dated:</b> 2 <sup>nd</sup> May 2023
<b>Subject:</b> Baroness Casey Review	<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 47-23	<b>For Information</b>
<b>Report authors:</b> Strategic Development and Professionalism and Trust	

## Summary

The final report of Baroness Louise Casey of Blackstock's Review of the Metropolitan Police Service (MPS) was published on the 22<sup>nd</sup> March 2023. The independent review was commissioned by the previous Commissioner of the MPS, Dame Cressida Dick DBE QPM to look into the Metropolitan Police's culture and standards.

The review began in February 2022 and completed in March 2023.

The review:

- discusses whether the MPS's leadership, recruitment, vetting, training, culture and communications support the standards the public should expect
- recommends how high standards can be routinely met, and how high levels of public trust in the Met can be restored and maintained

At the Police Authority Board in March 2023, Members asked the City of London Police (CoLP) to provide an update to the Board's next meeting on any impacts around the recommendations from the Casey report, for the City of London Police. It was acknowledged that the report had only just been published and time would be needed to digest in detail but nevertheless the Board were keen to have reassurance at a strategic level that the recommendations were being considered and learning taken on board.

This report provides an update on CoLP's approach including governance, and a assessment against the recommendations to support any further work required.

## Recommendation

Members are asked to note the report.

## **Main Report**

### **Background**

1. The final report of the Baroness Casey Review of the Metropolitan Police Service (MPS) was published on the 22<sup>nd</sup> March 2023. The independent review was commissioned by the previous Commissioner of the MPS, Dame Cressida Dick DBE QPM to look into the Metropolitan Police's culture and standards.

### **Current Position**

2. Members will be aware from other reports to your Committees including updates on Child Q: Local Child Safeguarding Practice Review; Op Hotton<sup>1</sup>; Op Hood: CoLPs review into historic sexual misconduct cases over the previous 20 years, that there are a number of existing workstreams looking at standards and culture in the City of London Police. These include, for example, action plans around the above reports and the 2022 HMICFRS Inspections of CoLP on Counter Corruption and Vetting, the 2022 HMICFRS Thematic inspection on Vetting, Misconduct and Misogyny, and workstreams on inclusivity under the Equality and Inclusion portfolio.
3. The Head of Professionalism and Trust chaired a meeting of all relevant service heads on the 3<sup>rd</sup> April 2023 to agree an approach. It was noted that many of the report recommendations are linked to strategic themes that have been identified and are in the process of being addressed by forces across the country including City of London Police.
4. It was agreed that in order to provide this update to the Board that each service lead would undertake an assessment of the 16 recommendations to assess the relevance of the recommendation to CoLP and evidence any activities underway to address similar issues or achieve similar aims.
5. After this initial assessment if there were any areas identified for further work then these would be included in existing action plans/ workstreams where this is appropriate.

### **Governance**

6. It was agreed that:
  - As the recommendations from the review are cross cutting that Strategic Development, HQ would co-ordinate the responses from service heads and ensure any required actions are assimilated into existing action plans where appropriate.
  - The review would be considered by the newly formed HMICFRS Operational Improvement Board along with other inspections/ reviews as appropriate.

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<sup>1</sup> [Operation Hotton recommendations - Metropolitan Police Service, September 2021 | Independent Office for Police Conduct](#)

- In terms of Member oversight progress updates on any action required would be brought to Professional Standards and Integrity Committee (PSIC) as part of existing reports.

7. The assessment is at Appendix 1.

## Conclusion

8. While the Casey Review focused on the MPS, CoLP recognises the importance of the findings and is taking learning from it, incorporating the key strategic themes into existing work plans to improve standards and culture.

## Appendices

- Appendix 1 – High level assessment - Casey Recommendations

## Background Papers

[Baroness Casey Review \(met.police.uk\)](https://met.police.uk)

Previous Reports to Committees	Committee(s)
City and Hackney Safeguarding Children Partnership (CHSCP) Child Q Practice Review	Safeguarding Sub-May 2022 PAB- May 2022 PSIC-May 2022
Pol 22-22 Violence Against Women and Girls Update (references Op Hotton work)	PSIC- May 2022 PAB – May 2022
Pol 119-22- Operation Hood	PSIC – November 2022

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Baroness Casey Review ‘Cleaning up the MET’	Recommendation &/or Area for Improvement	Force Task Owner	Force Progress & Response
1.	<ul style="list-style-type: none"> <li>The misconduct process is not fit for purpose. A new, independent, multidisciplinary team of officers and staff should be brought in by the Met to reform how it deals with misconduct cases, with a particular focus on how it handles sexual misconduct, domestic abuse and discrimination.</li> </ul>	<p><b>Professional Standards Dept (PSD)</b></p>	<p><b>Current Position:</b> Whilst PSD is fit for purpose, consideration is being given to the training and expertise required of officers investigating corruption and conduct in the changing landscape where there is increased focus on complex criminal investigations into sexual offences. For example officers require skills in phone downloads and review.</p> <p>Additionally, CoLP will be increasing resources in PSD as part of the Corporate Services Review and is considering the recruitment of Police Staff Investigators as part of this uplift. A dedicated resource has been allocated to oversee the delivery of vetting/ misconduct/ CCU Inspections recommendations.</p> <p><b>Linked workstreams:</b> this recommendation already links into the Operation Hood review and thematic and force HMICFRS Inspections (Misogyny, Misconduct, Vetting and CCU) which are reviewed within PSD and Strategic Force Boards and reports into PSIC.</p>
2.	<ul style="list-style-type: none"> <li>The Met should embed and enforce the highest policing ethical values and standards across all of its systems and management, from recruitment and vetting through to supervision and the misconduct process, making sure these are adhered to by all its officers and staff, and that those who breach the standards face the consequences the public would expect.</li> </ul>	<p><b>Human Resources (HR) &amp; Professionalism and Trust (P&amp;T)</b></p>	<p><b>Current Position:</b> The CoLP has adopted much of the best practice learning from the uplift programme which has been embedded with the recruitment process. A new Applicant Tracking System (ATS) has been procured and will be live within the next few months which will assist with standardising recruitment practices across all roles. An additional interview step has been added into the student officer recruitment process which is a supplementary step to the nationally mandated recruitment process. Face to face interviews are being held with all new officer recruit candidates. This is an important step in gauging suitability for the role. In terms of embedding values, HR will support L&amp;OD with the review and roll out of the Management</p>

			<p>Development Programme, maximising opportunities to embed and enforce values and standards. Additionally, the Inclusivity Programme tackles issues of values and ethics and the CoLP is also currently rolling out Active Bystander Training in April and May 2023.</p> <p>CoLP adheres to all published policy and police regulations in regard to vetting.</p> <p>In terms of recruitment there is a Force Vetting Policy, and this is strictly applied and is role specific and whilst this has been challenging during the Police Uplift Programme the Force has ensured that it has maintained the highest standards. Vetting is completed in line with Vetting APP the Vetting codes of Practice. Wherever vetting is withdrawn consideration will be given to removal of the staff member from force as appropriate using the available legislation.</p> <p>In terms of supervision and misconduct process, the Force has taken the approach of fast-tracking misconduct hearings where this is appropriate with one officer being dismissed recently under this process. For Appropriate Authority decisions for conduct, consideration is given to the College of Policing Guidelines for Misconduct Outcomes to ensure that decisions are in line with national expectations and that they appropriately consider relevant factors. Additionally, Counter Corruption Unit proactively seek to identify and disrupt activity that falls below the values expected in policing.</p> <p>The Code of Ethics is currently being reviewed at a national level and all Forces are being consulted on this currently, including CoLP.</p> <p><b>Linked Workstreams:</b> Misconduct data is reported quarterly to the PSIC with dip samples of outcomes on misconduct cases presented to Members. Also links into thematic and force HMICFRS</p>
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			Inspections (Misogyny, Misconduct, Vetting and CCU) which are reviewed within PSD and Strategic Force Boards such as the Renewing and Rebuilding Trust and Confidence Board and also reports into PSIC.
3.	<ul style="list-style-type: none"> <li>Vetting standards should be changed with immediate effect to guard against those who intend to abuse the powers of a police officer. The Met should introduce new end-to-end processes throughout an officer or staff member’s service – from initial recruitment and vetting through to leaving the force – with a relentless focus on identifying and reducing opportunities for predators who seek to abuse the powers of a police officer from joining or staying in the Met.</li> </ul>	<b>PSD (Vetting)</b>	<p><b>Current position:</b> CoLP has a Force Vetting Policy which was reviewed in 2022 and is next due for review in 2025. In light of this recommendation this Policy will be reviewed again.</p> <p>The Vetting Manager and Head of PSD will develop a policy to deal with re-vetting and how to manage any subsequent process where a member of staff loses their vetting. However, the 2017 APP<sup>1</sup> (and the subsequent 2019 and 2021 iterations) have included the guidance in section 8.47. This makes clear that where vetting is withdrawn or refused on renewal, if alternative employment cannot be identified (for which they have sufficient clearance) or the risk cannot be reasonably managed, then proceedings for dismissal may take place.</p> <p>Counter Corruption Unit( CCU) will continue to develop their proactive capability to continue to reduce opportunity for predators who seek to abuse their powers.</p> <p><b>Linked workstreams:</b> This is being tracked as part of the HMICFRS Vetting and Counter Corruption Delivery Plan, reporting monthly into the newly formed CoLP HMICFRS Operational Improvement Board.</p>
4.	<ul style="list-style-type: none"> <li>Some of the worst cultures, behaviours and practices identified by the Review have been found in specialist firearms units, where standards should be at their absolute highest. The Commissioner should introduce immediate changes to address our concerns with the Parliamentary and Diplomatic Protection</li> </ul>	<b>Local Policing (LP)</b>	<p><b>Current Position:</b> To put some context around this for CoLP the Tactical Firearms Group (TFG) consists of an establishment of 92 officers (currently working towards this FTE and also running a campaign to encourage greater diversity in TFG targeting female officers). The officers in the Unit work closely together on a day-to-day basis subject to shifts.</p>

<sup>1</sup> APP-Associated Professional Practice

	<p>(PaDP) and Specialist Firearms (MO19) Commands, including:</p> <ul style="list-style-type: none"> <li>○ i) effectively disbanding PaDP in its current form, ensuring there is an absolute ‘reset’ with a new ethos, identity and a focus on rooting out unacceptable behaviour.</li> <li>○ ii) setting new, higher vetting and behaviour standards in its specialist armed teams to identify any conduct issues and to keep out those drawn to these roles for the wrong reasons. In addition, all current officers carrying firearms, including those in MO19 and PaDP, should be thoroughly re-vetted and have this standard applied to them retrospectively.</li> <li>○ iii) revoking unequivocally and permanently firearms qualifications or ‘blue cards’ where any officer’s values and standards fall short of public expectations</li> <li>○ iv) installing new, external management to oversee the Specialist Training Centre to immediately address issues with its culture and standards.</li> </ul>		<p>i) TFG is part of the Local Policing Directorate and is not a large directorate in its own right as in the MPS. There is no regular deployment for parliamentary and diplomatic protection other than for planned high profile visitors to the City when the TFG will assist with any pan London security Operation under mutual aid.</p> <p>It is a tight knit unit with intrusive supervision and officers work well together and are respectful of each other in this high-risk environment.</p> <p>The Local Policing (LP) Senior Leadership Team (SLT) met with the TFG officers to explore any issues raised by the Casey Review and there were no issues around culture raised by officers or supervisors.</p> <p>Officers have had an opportunity to feed in anonymously through the Staff Survey and other anonymous reporting avenues which are all accessible on the Force intranet.</p> <p>LP SLT have met with all TFG teams and discussed staff survey and standards expected.</p> <p>ii) Firearms Officers are vetted to the required standard as laid down in Vetting Policy. Additionally, there is national work instigated by the National Police Chiefs Council (NPCC) which asks all police forces to check their officers and staff against national police databases for misogyny and predatory behaviour. This will help identify anyone who may be unfit to serve at the expected standard of a firearms officer and root them out. This work is due to complete in September 2023.</p> <p>iii) This would be assessed as part of any misconduct process concerning TFG officers.</p>
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			<p>iv) CoLP has its own firearms training capability and CoLP officers are trained separately to the MPS (albeit from an operational perspective they do work together on pan London Operational deployments as required). Again high standards of training, culture and leadership is a pillar that runs throughout the Firearms training department, with regular feedback sought from students and any identified issues followed up.</p> <p><b>Linked Workstreams:</b> The Inclusivity Programme aims to give officers the confidence to report on inappropriate behaviour of colleagues and actively promotes the importance of a positive and respectful culture both internal and how we treat the public. This is being rolled out through Active Bystander Training in April and May 2023. A mentioned CoLP is conducting the NPCC requirement of additional PND checks for all of its officers and staff.</p>
<p>5.</p>	<ul style="list-style-type: none"> <li>• The Government should expedite providing the Commissioner with new powers to support his efforts to rapidly reform and clean up the Met, including:             <ul style="list-style-type: none"> <li>○ providing Chief Constables the right of appeal to a Police Appeals Tribunal following a misconduct hearing when they conclude the sanction is inadequate.</li> <li>○ enabling the Met and other forces with a clear legal power to reopen closed misconduct investigations. iii) changing police regulations to ensure that failure to maintain or achieve vetting status is grounds for removal. iv) introducing a managed severance process to allow officers to exit from the service and ensure that the service has the skills it needs.</li> </ul> </li> </ul>	<p><b>Government</b></p>	<p><b>This will impact all forces.</b> The current MPS Commissioner Sir Mark Rowley QPM has been proactive in advocating change in this area.</p> <p>The Home Office announced in January 2023 a Review of police dismissals- this is in progress. The Force will feed into this review as part of the formal consultation process once issued to Forces.</p> <p><a href="https://www.gov.uk/government/news/review-of-police-dismissals-launched">Review of police dismissals launched - GOV.UK (www.gov.uk)</a></p>

	<ul style="list-style-type: none"> <li>○ strengthening the pension forfeiture rules so that a criminal offence does not have to only be committed ‘in connection’ with an officer’s service in order for them to lose their pension.</li> </ul>		
<p>6.</p>	<ul style="list-style-type: none"> <li>• The Met should radically reform and re-specialise Public Protection Teams, including the establishment of new Specialist ‘Soteria’ teams to deal with rape and serious sexual offences. The Met should also aim to specialise its domestic abuse service to create more victim-centred approaches and to work more closely and in a more integrated way with non-police specialist domestic abuse services. These teams should be reinvigorated and properly resourced. Together this should be a new and significantly enhanced offer to women in London.</li> </ul>	<p><b>Specialist Operations (Public Protection Unit (PPU))</b></p>	<p><b>Current Position:</b> The COLP has a dedicated Public Protection Unit (PPU) This has been highlighted as an area for attention under the latest HMICFRS PEEL 2022 Inspection. Since the HMICFRS came into Force to conduct their field work in November and December 2022 COLP has been quick to act and has now implemented a training strategy, procured new monitoring software and completed an uplift in qualified staff for the PPU. Posts in the PPU have been increased from 9 to 15 with 3 vacancies remaining and plans to fill them by September 2023. There are currently 12 posts filled. The team will be a mix of experienced and new officers.</p> <p>COLP is committed to the Rape and Serious Sexual Offences (RASSO) National Operating Model (Op Soteria<sup>2</sup>) mentioned in the action. DCS Richard Waight, Specialist Operations, has set up a meeting to ensure COLP moves to this by June 2023 when it launches. L&amp;OD next round of vulnerability training will focus on Cyber Domestic Abuse &amp; areas around victim trauma, Op Soteria Bluestone<sup>3</sup>, specialist roles for sexual offences investigation (SOIT) and Sexual Offences Liaison training (SOLO).</p> <p>In terms of domestic abuse, the PEEL Inspection identified the COLP as innovative, stating that Investigators actively pursue evidence led domestic abuse prosecutions, in cases where victims are at their most vulnerable; and the force records crimes well and is amongst the best in England and Wales at obtaining the best outcomes for victims.</p>

<sup>2</sup> [Operation Soteria – Transforming the Investigation of Rape \(npcc.police.uk\)](https://npcc.police.uk)

<sup>3</sup> [Operation Soteria Bluestone | College of Policing](#)

			<p><b>Linked Workstreams:</b> HMICFRS PEEL Inspection 2022 and Violence Against Women and Girls (OP Reframe); Op Soteria.</p>
<p>7.</p>	<ul style="list-style-type: none"> <li>• The Met should create an overarching children’s strategy for London to address long-standing concerns about its child protection and safeguarding practices. This should:             <ul style="list-style-type: none"> <li>○ address its approach to children and young people who are suspected of crimes, and its approach to protecting children and young people who are both victims and perpetrators, for example, through criminal and sexual exploitation and grooming.</li> <li>○ provide training for all officers who work with children to prevent ‘adultification’, where police officers and others regard children, especially Black and ethnic minority children, as threats rather than children who need protection from harm.</li> </ul> </li> </ul>	<p><b>SO (PPU) / Learning and Organisational Development (L&amp;OD)</b></p>	<p><b>Current Position:</b> The Force is linked into relevant partnerships around Safeguarding with City and Hackney Safeguarding Partnership and the City of London Corporation.</p> <p>CoLP will need to link in with the MPS on this action if the MPS create an overarching children’s strategy for London, CoLP would propose to adopt the same standards so there is consistency across London. This would be done in consultation with the City of London Corporation.</p> <p>HMICFRS Inspections have taken place in this area. The last inspection specifically on Child Protection was published in July 2020 and re-inspection in December 2021- Recommendations and progress on these are reported as part of the HMICFRS update to SPPC.</p> <p>CoLP already does a considerable amount of training for frontline officers on vulnerability – in 2021/22 - mandatory vulnerability training included Voice of the Child.</p> <p>In terms of training on issues such as ‘adultification’ this was identified as an issue and resultant recommendation under the local Safeguarding Practice ‘Child Q’ Review. This was reported to the Safeguarding Sub Committee, the Police Authority Board and the PSIC in May 2022- with Recommendation 13 recommending multi-agency ‘adultification’ training actively focusing on practitioners from school and the police.</p> <p>L&amp;OD has created a new stop &amp; search package with the following learning outcomes as a response to Child Q.</p> <ol style="list-style-type: none"> <li>1. Revision of Stop &amp; Search</li> </ol>

			<p>2. Understanding of term ‘Adultification’                  3. Understanding use of Appropriate Adult</p> <p>This has been delivered to the Response teams and wider roll out to cover front line officers.</p> <p>Mentivity training also discusses Adultification which all student officers receive and open to the wider force linked to the Inclusivity program.</p> <p>Updates on Child Q recommendations progress is being reported to PSIC.</p> <p><b>Linked workstreams:</b> Child Q, Stop and Search and HMICFRS Inspections reporting to PSIC and SPPC, respectively. Preparation for the unannounced custody inspection, which considers vulnerability of children and alternatives to custody.</p>
8.	<ul style="list-style-type: none"> <li>The Met should be reformed so that the Peelian principles of policing by consent – securing and maintaining the respect and approval of the public – are its guiding principles, and the measures against which all of its policies and practices are tested</li> </ul>	<b>Strategic Development (SD)</b>	<p><b>Current position:</b> This is a high-level strategic recommendation.</p> <p>In the City of London Police PEEL Inspection 2022 the inspectors did comment that most staff they spoke to had noticed the change in focus introduced by the new chief officer team as part of the force’s objectives: to focus on victims and people.</p> <p><b>Linked Workstreams:</b> It can be linked to existing work in CoLP to embed the Policing Plan values across our organisation and the creation of a Professionalism and Trust department. Transparency and accountability for decision-making, considered fundamental to policing by consent, is delivered through both public and private governance operated by the Police Authority Board and its committees.</p>
9.	<ul style="list-style-type: none"> <li>The Met should introduce a new process with Londoners to apologise for past failings and rebuild consent, particularly</li> </ul>	<b>Corporate Comms</b>	<p><b>Current Position:</b> Regardless of both forces (CoLP and MPS) serving the Capital, it is assessed that this is nuanced to the MPS which has a</p>



	<p>with communities where this is most at risk.</p>		<p>different governance model (The Mayor of London/ MOPAC) for greater London and is a different force to the City of London Police.</p> <p>Internal Communications activity in relation to trust and confidence is already based on the agreed approach with PSD, with Chief Officer Team understanding. This includes consistent communications relating to upcoming hearings, hearing outcomes and both internal and external communications handling required. This was demonstrated recently with the fast-tracked dismissal of a CoLP officer.</p> <ul style="list-style-type: none"> <li>• A process is in place for all reports of significance relating to trust and confidence e.g. Baroness Louise Casey, Dame Rachel de Souza and DCC Maggie Blyth (NPCC lead for Violence Against Women and Girls) are considered for both internal and external communications sharing or comment (either reactive or proactive in the case of media relations).</li> <li>• Corporate Communications are mindful and consider the use of the Force Values in all communications activity i.e., both public messaging on trust and confidence relating to officer and staff misconduct, and also other corporate messaging such as the PEEL inspection media release and internal communication.</li> <li>• All relevant communications are supported with an appropriate communications plan considering public perception and how the CoLP recognises and positions itself based on its values of professionalism, integrity and compassion: upon the recent NPCC data wash being reviewed by PSD and any corporate decisions taken, upon outcomes of existing conduct and misconduct cases and upon new cases of conduct or misconduct.</li> <li>• Clarity at the City of London Police on internal and external communications from its Policing Plan to its Violence Against Women and Girls strategy, work on the Police Race Action Plan and importance of PSD, allow for a consistent and clear</li> </ul>
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			<p>approach to communications, with a lower risk of missing an issue or not responding to it consistently.</p>
<p>10.</p>	<ul style="list-style-type: none"> <li>The use of stop and search in London by the Met needs a fundamental reset. The Met should establish a charter with Londoners on how and when stop and search is used, with an agreed rationale, and provide an annual account of its use by area, and by team undertaking stop and searches. Compliance with the charter should be measured independently, including the viewing of Body Worn Video footage. As a minimum, Met officers should be required to give their name, their shoulder number, the grounds for the stop and a receipt confirming the details of the stop.</li> </ul>	<p><b>LP</b></p>	<p><b>Current position:</b> The CoLP uses Stop and Search as a tactic appropriately and proportionately. This has been borne out in the HMICFRS PEEL inspection 2022.</p> <p>In terms of internal processes and supervision: Stop Search / BWV / Use of Force are dip sampled by Supervisors with City Silver now leading on dip sampling to ensure continuous monitoring of all three areas.</p> <p>The CoLP Stop &amp; Search and Use of Force working group continues to meet quarterly. Attended by PSD / Support Network leads / Police Federation Reps and Units Heads to review data and trends/ AFIs.</p> <p>In terms of external input and challenge: the University of East London Students are on a program to meet with CoLP, and review stop search training – first meeting is 27<sup>th</sup> April 2023. Students will receive input and give feedback on Stop /Search training.</p> <p>The Stop search lead is engaged with the Home Office regarding changes to stop search and the linking of stop search / use of force to incidents.</p> <p>In terms of existing external scrutiny:</p> <ul style="list-style-type: none"> <li>Stop / Search Use of Force is reviewed by IASG</li> <li>Stop Search slips and BWV – work continues to build a stronger process around this with our IASG</li> <li>Stop Search / Use of Force data scrutinised by Professional Standards and Integrity Committee (PSIC) on a quarterly basis.</li> </ul> <p>In HMICFRS PEEL Inspection 2022: The force has been praised for its use of innovative stop and search practices, specifically related to Project Servator. The use of intelligence led behaviour techniques have been highlighted as best national practice.</p> <p>Officers have also been given training on legitimacy and ethics when concerned with stop and search. L&amp;OD has created a new stop &amp;</p>

			<p>search package with the following learning outcomes as a response to Child Q.</p> <ul style="list-style-type: none"> <li>• Revision of Stop &amp; Search</li> <li>• Understanding of term ‘Adultification’</li> <li>• Understanding use of Appropriate Adult</li> </ul> <p>This has been delivered to the Response teams and wider roll out to cover front line officers.</p> <p>Also, CoLP ran a ‘Focus on’ learning Session re: the impact of Stop and Search on communities by Sayce Holmes-Lewis<sup>4</sup> for Black History Month.</p> <p>Lastly, CoLP has a very low complaint rate for Stop and Search with only 2 recorded to the end of Q3 2022-23 (latest IOPC data available).</p> <p><b>Linked workstreams:</b> Training and development workstream for the Police Race Action Plan as part of the Equality and Inclusion updates, Child Q and Stop and Search all reporting to PSIC.</p>
<p>11.</p>	<ul style="list-style-type: none"> <li>• Frontline officers are those who Londoners see and depend on the most from day to day but feel demoralised, let down by their leaders, and exposed to high stress and pressure:             <ul style="list-style-type: none"> <li>○ i)The Met should build a frontline policing service for London which is as revered and well-resourced as its central specialist teams, giving Londoners 23 the Safer Neighbourhoods, Public</li> </ul> </li> </ul>	<p><b>Operations and Security</b></p>	<p><b>Current Position:</b></p> <p>i) The latest Staff Survey revealed that Officers and Staff are motivated to do their jobs well and feel on the whole valued and that their wellbeing is a priority.</p> <p>Since the most recent restructure of the CoLP, the Target Operating Model has been adjusted to address areas of greater need such as Sector/ Local Policing, PPU and through the Police Uplift Programme Response and Volume Crime – these are all classed as frontline. The Force has central specialist units such as Public Order and Firearms, Dogs and Mounted and Roads Policing officers to serve the City Community.</p> <p>There are some areas which will require increased capacity going forward based on demand which will be subject of workforce</p>

<sup>4</sup> [SHL \(sayceholmeslewis.com\)](http://sayceholmeslewis.com)

	<p>Protection and Response teams they deserve.</p> <ul style="list-style-type: none"> <li>○ ii)BCU Commanders in the Met should be empowered to account for, and explain with candour and transparency, the actions that are taken in their Borough, including those of the central, specialist units such as TSG and VCTF.</li> <li>○ iii) The Met should recognise trauma and desensitisation in its officers as a corporate responsibility and provide trauma training for Public Protection and Response officers as a priority, making access to counselling and other services easy.</li> </ul>		<p>planning. Workforce Planning capability is an area ColP is looking to enhance through the Corporate Services Review.</p> <p>ii) The City is a square mile with one operational Local Policing Directorate which includes some of the specialist assets such as Public Order , Firearms and Dogs and Mounted officers. This is led by Chief Supt BCU commander who reports to the Commander Operations and Security therefore by its nature the size of ColP enables empowerment of the BCU Commander responsible for these resources.</p> <p>iii)The Force has Trim (Trauma Risk Management) trained officers and enhanced access to this in times of heightened trauma such as in the aftermath of terrorist incidents in recent years (London Bridge, Westminster and Fishmongers Hall). Officers have access to Occupational Health Services, including counselling and talking therapies through supervisor referral or self-referral avenues.</p> <p><b>Linked workstreams:</b> Workforce Planning, Corporate Services Review, Health and Wellbeing, Staff Survey.</p>
<p>12.</p>	<ul style="list-style-type: none"> <li>• Londoners’ voices are missing from how London is policed. Existing structures do not provide a clear way for local authorities and their residents to hold the Met to account for how they police and tackle crime on a Borough basis. A new borough based approach should be put in place, building on the positive introduction of new dedicated Borough Superintendents, to ensure structures allow for greater transparency and challenge, including democratic representatives through local authorities,</li> </ul>	<p><b>SD / P&amp;T</b></p>	<p><b>Current position:</b> The COLP has a structure in place at a local level to engage with the Community through Community Meetings/Ward Cluster panel meetings led by Local Policing, alongside our engagement with the IASG and (being established Youth IASG).</p> <p>A community survey is also conducted every 3 years to engage with workers and residents in the City and to gauge their concerns.</p> <p>Additionally, City wide residents meetings are held by the City of London Corporation as the Local Authority at which Chief Officers from the COLP attend and listen to resident issues and respond.</p>

	<p>provide the ability to access high quality data and review case handling, and deliver strong and consistent community engagement.</p>		<p>Additionally, the Police Authority which is made up of elected Members is operated by the local authority as Police Authority for the City of London.</p> <p>CoLP reports quarterly to the SPPC and Police Authority Board on Community Engagement.</p> <p><b>Linked workstreams:</b> Community Engagement Strategy/ Cluster meetings</p>
13.	<ul style="list-style-type: none"> <li>The Commissioner and Deputy Commissioner, building on their recent appointments to lead the Met, should bring in new specialist expertise from outside the Met in permanent – rather than advisory – roles. This should be used to support them to overhaul the management of the organisation, and lead on work including reforming the culture of the Met and the creation of a workforce plan, including measurable and rapid progress on the diversity of the Met’s officer corps at every level.</li> </ul>	HR / P&T / SD	<p><b>Current Position:</b> The CoLP Chief Officer Team has only recently been established in the last year and comprises a majority of officers who have not previously worked in the City of London Police. This has brought in external experience and appropriate challenge to existing structures and culture.</p> <p>Work has progressed on the CoLPs workforce plan for the next FY and there has been a concerted drive to recruit from minority ethnic groups and increase female officer numbers under the PUP.</p> <p>Workforce Data is scrutinised on a quarterly basis at the Resource Risk and Estates Committee (RREC), this includes targets and trends on diversity in recruitment of officers and data on diversity in ranks and police staff grades. The diversity data is also reported to the PSIC as part of the quarterly Equality and Inclusion update.</p> <p><b>Linked Workstreams:</b> The reference to the work around reforming organisational culture and improving Equality, Diversity and Inclusivity is covered through other work streams including work being led by Professionalism &amp; Trust, targeted recruitment of people from under-represented groups and a positive action leadership scheme offered by HR.</p>
14.	<ul style="list-style-type: none"> <li>A new governance structure should be introduced to oversee and scrutinise the changes needed and ensure full</li> </ul>	P&T / SD	<p><b>Current Position:</b> The Police Authority Board (PAB) and its Committees provide transparency and accountability and are made up of elected Members and external members. They include:</p>

	<p>transparency and accountability to Londoners, while maintaining the operational independence of the Commissioner: 24 i) A new, quarterly Policing Board for London – chaired by the Mayor of London, similar to the model used for Transport for London – should be created to drive forward the changes called for in this review. ii) The Commissioner should continue to chair the new Met Management Board responsible for the leadership, strategic direction and operational policing of the Met.</p>		<p>Strategic Planning and Performance Committee Resource Risk and Estates Committee Professional Standards and Integrity Committee Economic and Cyber Crime Committee</p>
15.	<ul style="list-style-type: none"> <li>The Met and the Mayor of London should commission independent progress reviews after two years, and again after five years, so that Londoners can have trust and confidence that reform is taking place.</li> </ul>	<b>SD</b>	<p><b>Not relevant as specific to the MPS.</b> But linked to the recommendations below.</p>
16.	<ul style="list-style-type: none"> <li>The key measures used to test whether these reforms are taking place and delivering reforms at the scale and pace necessary should include:                             <ul style="list-style-type: none"> <li>Improvements in public trust, confidence and fairness amongst Londoners, and a narrowing of the gaps in these measures between Black, ethnic minority and LGBTQ+ Londoners and all Londoners</li> <li>Increases in the proportion of misconduct cases where action is taken</li> <li>Reductions in racial disparity in misconduct cases Improvements in the charge rates for reported crimes</li> </ul> </li> </ul>	<b>SD coordination function across SO, PSD, HR</b>	<p><b>Current position:</b> These matters are already being monitored through Police Authority Board and its existing Committees (i.e. diversity of our workforce compared with the London demographic, charge rates, misconduct cases and racial disparity in misconduct cases) and/or directorate or force performance management mechanisms.</p> <p><b>Current Position:</b> The PSD team is currently undergoing a data review to understand any disproportionality of outcomes for misconduct processes for staff from ethnic minorities. The results should be used to inform work with the networks to support equality of outcomes for all. The team is reviewing discrimination conduct and confidential cases reported over the last five years with a learning focus to ensure the</p>

	<p>and, in particular, improvements in charge rates for crimes involving violence against women and girls</p> <ul style="list-style-type: none"> <li>○ Increases in the number of adult rape cases reaching court in line with Operation Soteria ambitions</li> <li>○ Improvements in response rates and times</li> <li>○ A narrowing in the gap between the diversity of the Met’s workforce, including its officers and senior officers, and the make-up of the city it polices.</li> </ul>		<p>best level of service is given to such cases and that officers with the rights skills and expertise are utilised for investigations.</p> <p>PSD will continue to push for criminal processes wherever appropriate and work with the CPS to improve rates of charge and conviction on such cases. PSD has set processes to ensure early engagement with external forces where they manage criminal investigations into COLP officers and there is a requirement for an early case conference to ensure appropriate division of roles and responsibilities and information sharing.</p> <p><b>Linked workstreams:</b> linked to Renewing and Rebuilding Trust and Confidence Board in relation to the force Police Race Action Plan and existing Equality and Diversity work streams.</p> <p>Many of these areas are reported to either PSIC or SPPC already.</p>
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<b>Committee(s):</b> Police Authority Board	<b>Dated:</b> 2 May 2023
<b>Subject:</b> Annual Review of Police Complaints Activity – 2021/22	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	1- People are safe and feel safe
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N/A</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>N/A</b>
<b>Report of:</b> Town Clerk	<b>For Information</b>
<b>Report author:</b> Rachael Waldron, Police Authority Compliance Lead, Town Clerk’s / D/Supt Claire Cresswell / PC Ann Roberts	

## Summary

This report provides an overview of complaints and allegations made about the City of London Police and the Action Fraud reporting service in 2021/22. There is a statutory requirement on specified local policing bodies<sup>1</sup> to publish quarterly Independent Office for Police Conduct (IOPC) complaints data relating to their force, and the relevant IOPC annual statistics report (the most up to date being for 2021/22). Local policing bodies are also required to publish a narrative setting out how they are holding the relevant chief officer to account and an assessment of their own performance in carrying out their complaints handling functions. They are required to publish this information in a prominent place on their website. The attached report, at Appendix 1, has been drafted with those obligations in mind.

## Recommendations

That members note the contents of the attached report, to be published on the City of London Police Authority website.

## Main report

### Background

1. Reports of dissatisfaction with the City of London Police are logged and assessed in line with Schedule 3 of the Police Reform Act 2002 and the Independent Office for Police Complaints (IOPC) Statutory Guidance 2020.
2. This assessment can result in one of a number of outcomes (covered in IOPC data):

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<sup>1</sup> Set out in the Elected Local Policing Bodies (Specified Information) (Amendment) Order 2021

- **Non-Schedule 3 or early service recovery.** The Professional Standards Directorate (PSD) of the City Police 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 lengthier 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.
  - **Schedule 3 Recorded** – 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 *reasonable and proportionate* 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.
  - **Referral to Independent Office for Police Conduct** – some complaints will be referred to the IOPC and they may decide to independently investigate or oversee a police investigation.
3. In February 2020, The Home Office introduced reforms to the police complaints system including changes to how reviews of police complaints (formerly known as appeals) were dealt with. Local policing bodies now have a statutory responsibility for reviews of police complaints, where the force would have previously been the appeal body.

### **Report for 2021/22**

4. There is no prescribed format for PCCs/Local Police Bodies to follow in relation to the publication of information concerning police complaints. The report at Appendix 1 seeks to fulfil the statutory obligations for publishing a report on this area. In preparation for the production of this report, similar report examples from a number of force areas were reviewed.
5. The report sets out complaints data for 2021/22 (which is already in the public domain on the IOPC website), a description of how the City of London Police Commissioner is held to account in terms of complaints, and an account of the Police Authority's own performance in terms of its responsibility to undertake complaints reviews. It also contains an explanation of how learning from the complaints processes is being embedded in the City Police.
6. For the City of London Police, IOPC data also includes complaints made about the national Action Fraud reporting service. This makes it difficult to make

comparisons with other forces in terms of volume of complaints. It is also difficult to make meaningful comparisons with the number of complaints made in years prior to 2021/22 because of the pandemic and also changes made to legislation and police conduct regulations.

7. The City of London Police received 588 complaints in 2021/22, of which 137 were about the local force and 451 were about the Action Fraud service. These complaints contained a total of 680 allegations.
8. In terms of complaint reviews, review panels formed under the auspices of the Professional Standards and Integrity Committee met on four occasions during 2021/22 to consider nine cases. The average number of days taken to make determinations in these cases was 197 days.

### **Improvements**

9. The Professional Standards Directorate of the City Police have introduced a number of processes to improve the efficiency, timeliness and quality of outcomes provided to complainants. Template letters developed for use as the basis of outcome letters have been continuously reviewed and refined to ensure they remain fit for purpose and explain the rationale behind outcome decisions in clear and unambiguous language. This has helped to improve understandability for complainants and ensure that they are appropriately signposted to alternative agencies, outside the police complaints system, who may be able to provide further assistance.
10. The Police Authority Team in the Corporation has been expanded, since January 2023, to include the appointment of a new policy officer to lead on professional standards and integrity work. This additional capacity will improve the support given to the Professional Standards and Integrity Committee, including in terms of the efficiency of its complaints review responsibilities, and the continuing professional development of the Team's compliance lead.

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**Appendices**

- Appendix 1 – Annual Review of Police Complaints Activity 2021/22

## City of London Police – Complaints 2021/22

### Introduction

This is an annual report of complaints and allegations made about the City of London Police and its national Action Fraud reporting service in 2021/22. Legislation<sup>2</sup> requires local policing bodies to publish the most recent Independent Office for Police Conduct (IOPC) quarterly complaints data for their force and the IOPC annual statistics report<sup>3</sup>, alongside a narrative setting out how it is holding the chief officer to account, and its assessment of its own performance in carrying out its complaints handling functions.

A glossary of terms used in relation to police complaints is at Annex A to this Report.

### 2021/22 complaints data – At a glance

The City of London Police received **588 complaints** in 2021/22, of which **137** were about the local force and **451** were about the Action Fraud service\*. These complaints contained a total of **680 allegations\*\***.

The average time to log a complaint was **3 days** and the average time taken to contact a complainant was **6 days**. On average it took **10 days** to finalise cases falling outside of Schedule 3\*\*\*, and **54 days** to finalise Schedule 3 cases.

The commonest complaints – accounting for 531 (78%) of cases – were about deliveries of duties and service. Of the 9 cases reviewed by the local policing body, 8 were not upheld (meaning the policing body concluded the complaint had been handled appropriately) and 1 was upheld.

*\*The City of London Police operates the national Action Fraud reporting service, complaints about which are included in its totals in IOPC figures*

*\*\*Each complaint may contain one or more allegations*

*\*\*\*Some complaints can be resolved by early intervention. If this does not occur, it must be recorded and investigated in line with IOPC guidance, which is known as a 'Schedule 3' complaint.*

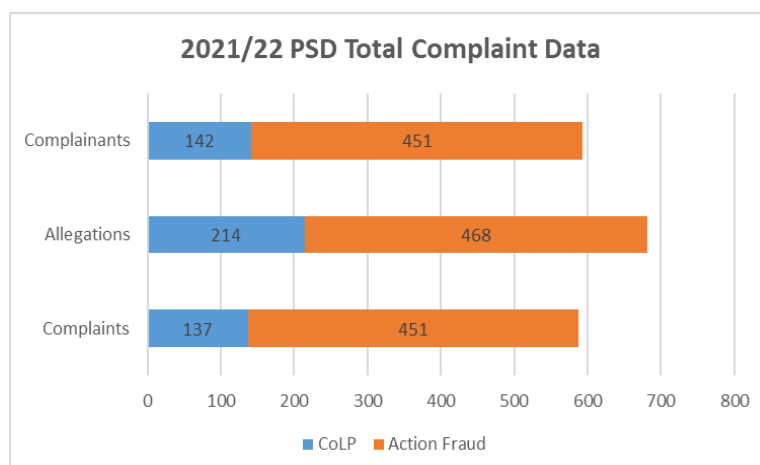
### City of London Police complaints 2021/22

**Chart 1** visualises the total volume of complaints, allegations, and number of complainants in 2021/22 and their split between the local City of London police service and national Action Fraud reporting service. It shows that the majority (c.70-80%) relate to the latter.

<sup>2</sup> See [here](#)

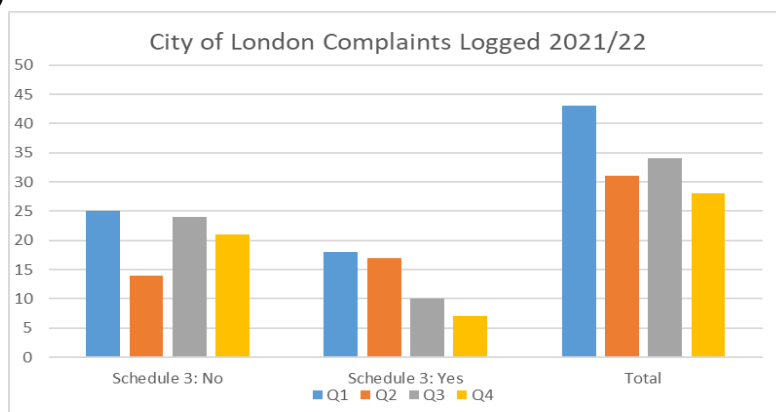
<sup>3</sup> Available [here and relevant data attached as Annex B to this report](#)

**Chart 1 – Total complaints – local service and Action Fraud**



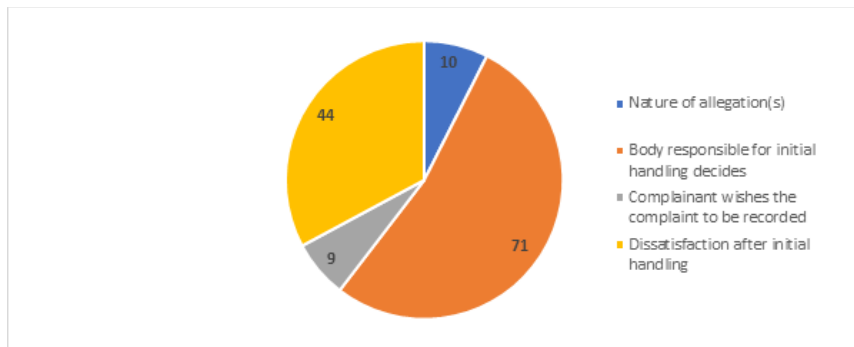
**Chart 2** shows how many complaints against the local City of London police service were recorded under ‘Schedule 3’ in each quarter of 2021/22. ‘Schedule 3’ refers to complaints recorded and investigated in line with the Independent Office of Police Conduct’s statutory guidance. Some complaints may not require a detailed ‘Schedule 3’ enquiry to address, for example if someone wants explanation of an issue or to note a concern. In these cases, a complaint is logged as ‘outside Schedule 3’. See Chapter 6 of [IOPC guidance](#) for full detail.

**Chart 2 – Breakdown of Schedule 3 and non-Schedule 3 complaints (exc. Action Fraud)**



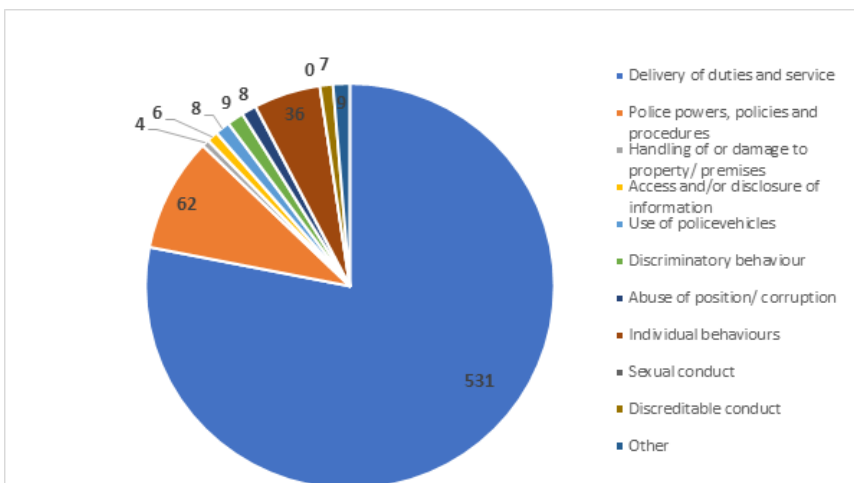
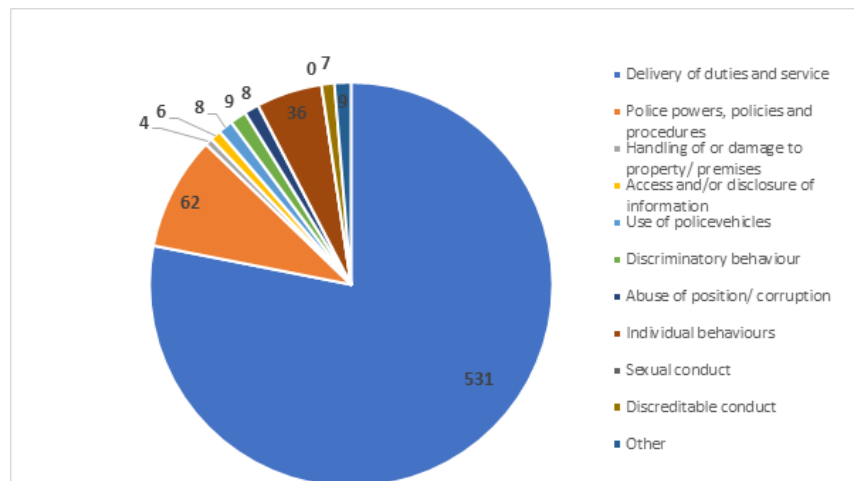
**Chart 3** shows why complaints were recorded as ‘Schedule 3’ by the City of London police. IOPC guidance (see link for Chart 2) sets out that complaints must be logged under Schedule 3 if a) the nature of allegations meets certain criteria of seriousness, b) if the chief officer or local policing body decides it is appropriate to do so, c) the complainant requests it be logged as such. A complaint initially not logged under Schedule 3 may then be if initial handling does not resolve it to the complainant’s satisfaction.

**Chart 3 – Reasons for recording complaints under Schedule 3 (inc. Action Fraud)**



**Chart 4** shows the breakdown of what types of allegations have been made against the City of London police. The following Table 2 shows the same information for additional clarity.

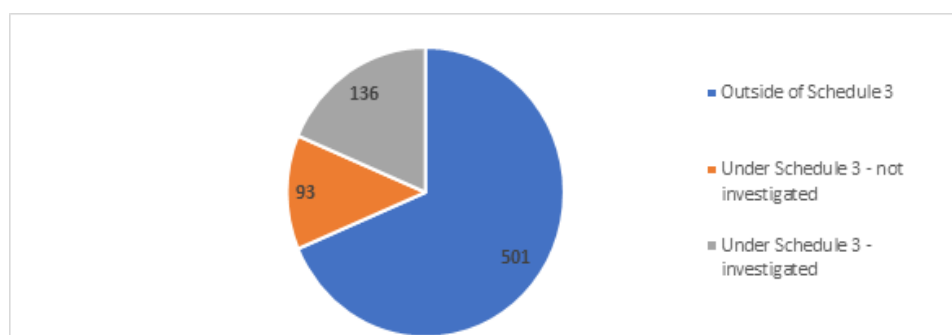
**Chart 4 – Breakdown of allegations – what has been complained about (inc. Action Fraud)**



<b>Table 2 – Breakdown of allegations – what has been complained about</b>	
<b>Category</b>	<b>Number of allegations</b>
Delivery of duties and service	531
Police powers, policies, and procedures	62
Handling of or damage to properties / premises	4
Access and/or disclosure of information	6
Use of police vehicles	8
Discriminatory behaviour	9
Abuse of position / corruption	8
Individual behaviours	36
Sexual conduct	0
Discreditable conduct	7
Other	9
<b>TOTAL</b>	<b>680</b>

**Chart 5** shows how allegations were finalised (i.e., concluded). As set out for Chart 2, some complaints and allegations are not recorded under ‘Schedule 3’. Not all complaints and allegations recorded as 'Schedule 3' must be investigated – for example if it is substantially the same as a complaint made previously. Chapter 10 [IOPC guidance](#) sets out when there is an is not a duty to investigate.

#### **Chart 5 – Means by which allegations were finalised**



### Action Fraud complaints

The City of London Police is the National Lead Force for economic crime. As part of this role the City Police operate the Action Fraud service for reporting and recording fraud offences – since 2013 all reported offences are sent to Action Fraud.

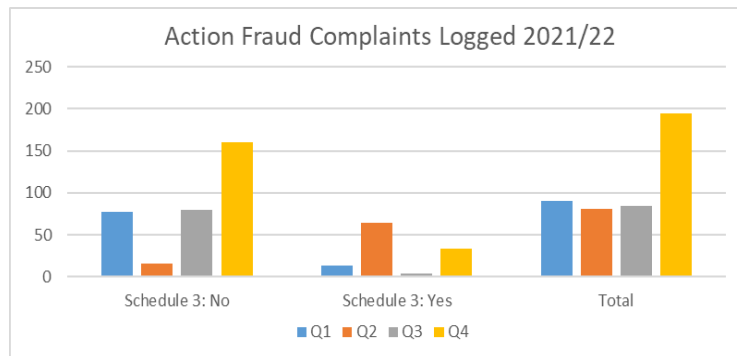
This sub-section provides a brief breakdown of complaints about Action Fraud, using internal data. As set out in Table 1 and Chart 1 above, 70-80% of complaints and allegations received by the City of London Police are about Action Fraud.

**Chart 6** shows the breakdown of ‘Schedule 3’ and ‘non-Schedule 3’ complaints about Action Fraud. Schedule 3’ refers to complaints recorded and investigated in line with the Independent Office of Police Conduct’s statutory guidance. Some



complaints may not require a detailed ‘Schedule 3’ enquiry to address, for example if someone wants explanation of an issue or to note a concern. In these cases, a complaint is logged as ‘outside Schedule 3’. See Chapter 6 of [IOPC guidance](#) for full detail.

**Chart 6 - Breakdown of Schedule 3 and non-Schedule 3 complaints – Action Fraud (internal data)**

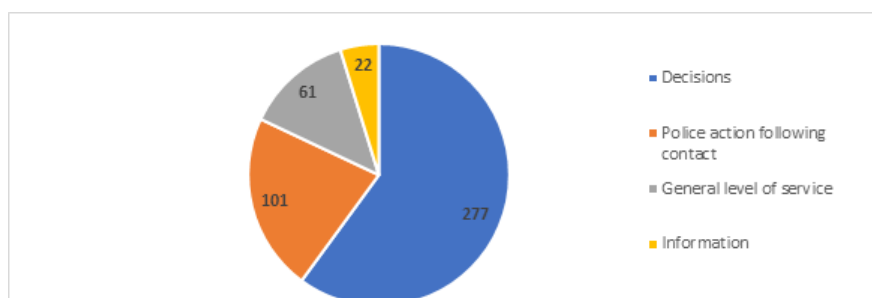


**Chart 7** shows the breakdown of types of allegations received about Action Fraud.

While the majority of allegations are about a failure to investigate cases sent to Action Fraud (in ‘decisions’ category below), Action Fraud is solely a reporting service and does not have investigative responsibilities. Cases sent to Action Fraud are first assessed by the National Fraud Investigative Bureau and, where appropriate, are disseminated to local police forces to consider an investigation.

The City of London Police now, as standard, provides complainants with details of relevant partners and stakeholders that may be better placed to address their complaint and recovery of money lost, which has resulted in increasing number of cases being resolved to the complainant's satisfaction.

**Chart 7 - Breakdown of allegations recorded for Action Fraud (internal data)**



Complaints regarding the delivery of the Action Fraud service are included with the City of London Police data by the IOPC. The City of London Police Authority’s Professional Standards and Integrity Committee (see below) has received separate reporting on the Action Fraud and City Police complaints data since September 2020. This has allowed a more focused approach to scrutinising the separate areas of complaints.

The detail of IOPC data on complaints and allegations against the City of London Police in 2021/22 is set out in Annex B to this report.

## **How the City of London Police Commissioner is held to account**

The Professional Standards and Integrity (PSI) Committee of the City of London Police Authority has responsibility for providing detailed oversight of professional standards in the City of London Police, including scrutiny of the City Police's handling of complaints and conduct matters. It is chaired by an elected member of the City of London Corporation. Members of this Committee also meet to determine complaints reviews received by the Police Authority (see below).

Further details on the overall work of this Committee can be found here: [<https://democracy.cityoflondon.gov.uk/mgCommitteeDetails.aspx?ID=398>].

The outcome of the quarterly PSI Committee meetings is reported to the City of London Police Authority Board, which has the overall responsibility for holding the City of London Police Commissioner to account for running an effective and efficient police service.

During 2021/22, the PSI Committee received statistical updates on complaint cases and trends relating to (a) the nature of allegations in complaints, and (b) the means by which those allegations are resolved. The PSI Committee continues to perform a highly detailed scrutiny function to examine the casework of complaints logged by the City Police.

The PSI Committee has worked with the Director of the Professional Standards Directorate (PSD) of the City Police to ensure that the papers reviewed by Committee Members contain sufficient information to be able to assess whether an appropriate outcome was reached, while not unnecessarily revealing personal details of individuals involved or creating extra workload. In 2021/22, the Committee continued to look at matters of conduct; it received updates on all misconduct meetings and hearings which had been dealt with by the City Police.

The PSI Committee continues to support the City Police in ensuring themes identified in complaint or conduct cases are progressed as issues of organisational learning and embedded widely across the service.

Learning is central to the work of PSD. Complainants often express that they want the officer/organisation to acknowledge what went wrong and understand how the Force will ensure that similar issues will not happen again. The PSD Engagement Officer established excellent relationships throughout the Force during the period in question, sharing learning identified from PSD cases and matters of reputational importance. Reflective Practice has been immersed as a part of the learning culture the Police Regulations encourage.

The Organisational Learning Forum (OLF) in the City Police has an important role in terms of embedding learning in the Force. It is supported by tactical working groups focusing on custody, public order, stop and search and professional standards, to promote learning at a local level. The Professional Standards Directorate Working Group (PSDWG) is attended by the compliance officer from the City of London Corporation's Police Authority Team, representing the PSI Committee. They attended meetings of the PSDWG in 2021/22, engaged in refresher workshops

facilitated by the IOPC with other South East area Offices of Police and Crime Commissioners, and provided the Committee with a digest of highlighted areas/themes of learning at these meetings.

### **The Police Authority Board's assessment of its own performance in carrying out its complaint handling function**

Since February 2020, local policing bodies have been responsible for making determinations on reviews of police complaints, which are appeals by the complainant where they feel the response they have received has not been handled in a reasonable or proportionate manner.

In the City of London, this responsibility is delegated to the Professional Standards and Integrity Committee of the Police Authority Board, whose members meet (in line with the established governance within the Corporation) to hold review panels to consider review applications received by the Police Authority.

The review panel consists of the Chair and two other members of the Professional Standards and Integrity Committee. The panel exists independently to review the handling of complaints and determine whether the complaint in question was dealt with reasonably and proportionately. It also considers any themes, trends and wider organisational learning which emerge from complaints.

The complaints review panel function is supported by the Compliance Lead within the Police Authority Team in the City of London Corporation, who handles the review process from start to finish. Their duties include the acknowledgement and assessment of review requests submitted to the Police Authority, administration of the review documentation, and drafting a report of recommendations to the review panel for each case, based on consideration of the relevant documentation.

All review requests submitted to the Police Authority are assessed against the criteria outlined in the IOPC statutory guidance for police complaints.

#### **Reviews considered in 2021/22**

Table 3 sets out the outcome of reviews completed by the local policing body for the City of London Police (i.e. the City of London Police Authority).

When a complaint has been recorded under 'Schedule 3' the complainant has the right to review the outcome of their complaint, and this is either done by the local policing body or the IOPC depending on a range of criteria, set out in Chapter 18 of the [IOPC guidance](#).

Reviews are not a reinvestigation of the merits of the original complaint – instead the relevant body will assess whether the police handled the complaint in a 'reasonable and proportionate' manner. If they conclude they did not, they may issue recommendations for how the police will improve their processes.

During 2021/22, the complaints review panel met on four occasions to consider nine cases.

<b>Table 3 - Outcomes of reviews by Local Policing Body:</b>		Upheld	Not Upheld
Reviews completed	9	1	8
<b>Subject matter of cases</b>			
Action Fraud	4	1	3
Police Powers, policies and procedures	5	0	5

One review was upheld by the Professional Standards and Integrity Review Panel during 2021/22, which determined that the City of London Police should provide a fuller explanation to the complainant of the matters being addressed.

There is no statutory timescale for reviews to be completed under the IOPC statutory guidance. There are several factors which may cause a delay in the completion of a review request. These can include the complexity of the case, and the necessity to make further enquiries with the force and/or the complainant, including reviewing police statements and Body Worn Video footage.

Nevertheless, the Police Authority recognises the importance of completing reviews in as timely a manner as practicable.

In 2021/22, requests for reviews were acknowledged within 10 days of receipt. The average number of days taken for the review panel to make determinations on cases during this period was 197 days.

### Themes

Three main themes emerged from complaint reviews submitted to the City of London Police Authority in 2021/22:

- i) *Perceptions of an inadequate service provided by the City of London Police* – this includes expressions of dissatisfaction from complainants across the initial handling of a complaint submitted (i.e., delayed engagement from the force to the complainant to discuss proportionate measures to resolve the matter reported).
- ii) *Greater acknowledgement of the emotional/financial impact of police decisions on complainants* – particularly across complaints that allege a disproportionate or unfair use of police powers, policies and procedures (i.e., police vehicle stops, use of force, stop and search, arrest and detention).
- iii) *Seeking appropriate reassurance that learning emerges from dissatisfaction and leads to fewer repeat incidents* – complainants have often cited a lack of acknowledgement from the force, on ‘what went wrong’ (across the handling of their complaint) as the main reason for submitting a complaint review.

These themes have been fed back directly to the Professional Standards Directorate Complaints Team, Professional Standards Directorate Engagement Officer and Working Group. Collectively, they have continued to work extensively

across the force, to address poor service as learning and have provided training to officers and staff on improvements that can be made via continuous professional learning and a non-disciplinary process called reflective practice. This process has enabled officers and line management opportunities to better understand complainants concerns and dissatisfaction, discuss matters that have gone wrong and identify key solutions to prevent future reoccurrences.

During the period in question, there was no system in place to assess a complainant's satisfaction with the review process. Complainants have been reminded about the Police Authority's remit in relation to the complaints system (i.e., to determine whether a reasonable and proportionate outcome was provided in respect to the handling of their complaint). And the Police Authority signposts complainants to alternative bodies outside the police complaints system that may be able to provide further impartial advice across a wide range of matters, such as the Citizens Advice Bureau and the Financial Conduct Authority. In addition, any dissatisfied complainant is advised on their legal right to seek judicial review via an application to the High Court. No such applications were made during 2021/22.

### **Reviews - conclusion**

The Police Authority Board remains satisfied that the right approach is being taken in terms of forming review panels from its Professional Standards and Integrity Committee to undertake independent complaints reviews.

It is a requirement in the complaints regulations that those determining review outcomes have relevant training. To this end the Compliance Lead in the Police Authority Team will continue to engage in refresher workshops facilitated by the IOPC and SANCUS (a nationally recognised investigative skills training company), to ensure that consistency continues to be applied across rationales produced for review outcomes.

The Police Authority Board recognises that improvements are required to ensure that complaints reviews are completed in a timely manner. Doing so will help support the Police Authority with its ambitions to be an effective oversight body that supports the delivery of the City of London Policing Plan. Work is being undertaken to improve the timeliness of responses.

The Police Authority Team has been expanded since January 2023, including with the appointment of a new policy officer to lead on professional standards and integrity work. This additional capacity will improve the support given to the Professional Standards and Integrity Committee, including in terms of the efficiency of its complaints review responsibilities.

Annex A – Glossary of Terms

Annex B – IOPC data for 2021/22

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## **Annex A: glossary of terms**

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

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

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

- a member of the public was adversely affected by the matter complained about, or is acting on behalf of someone who was adversely affected by the matter complained about
- a member of the public who claims to be the person in relation to whom the conduct took place
  - claims to have been adversely affected by the conduct
  - claims to have witnessed the conduct, or
  - is acting on behalf of someone who satisfies one of the above three criteria
- a member of the public can be said to be a witness to the conduct if, and only if: they have acquired their knowledge of the conduct in a manner which would make them a competent witness capable of giving

admissible evidence of that conduct in criminal proceedings, or

- they possess or have in their control anything that could be used as admissible evidence in such proceedings

- a person acting on behalf of someone who falls within any of the three categories above. This person would be classed as an 'agent' or 'representative' and must have the written permission of the complainant to act on their behalf. A person is 'adversely affected' if they suffer distress or inconvenience, loss or damage, or are put in danger or at risk by the conduct complained of. This might apply, for example, to other people present at the incident, or to the parent of a child or young person, or a friend of the person directly affected. It does not include someone distressed by watching an incident on television.

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

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

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

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

### **Complaint recording**

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

Changes to the Police Complaint & Conduct regulations in 2020 placed a greater emphasis on handling complaints in a *reasonable and proportionate* way and in a more customer focused manner.

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;

**Non-Schedule 3 or early service recovery.** 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.

**Schedule 3 Recorded** – 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 *reasonable and proportionate* 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.

**Referral to Independent Office for Police Conduct** – 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.

#### **Investigations:**

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

#### **Investigation outcomes:**

Where a complaint has been investigated but the investigation has not been subject to special procedures, or a complaint has been handled otherwise than by investigation, the outcome of the complaint should include a determination of whether:

- the service provided by the police was acceptable
- the service provided by the police was not acceptable, or
- we have looked into the complaint, but have not been able to determine if the service provided was acceptable

#### **Reflective Practice Review Process:**

Practice Requiring Improvement (PRI) is an appropriate outcome within Police Regulations for low level matters of complaint or conduct following a PSD investigation. The Reflective Practice Review Process (RPRP) is the process undertaken by officers to reflect upon their involvement and review the practice that requires improvement. Where a matter is raised or identified internally and does not reach the threshold for PSD investigation or disciplinary action, it should be handled locally by line managers and supervisors under RPRP. The process



should be a clear focus on reflection, learning from mistakes and focusing on actions / development to improve and, where necessary, put the issue right and prevent it from happening again. RPRP should be used for low-level intervention and performance issues that do not warrant a written warning or above or Unsatisfactory Performance Procedures (UPP).

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

**Misconduct:** A breach of the Standards of Professional Behaviour

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

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

**Sub judice:** After recording a complaint, the investigation or other procedure for dealing with the complaint may be suspended because the matter is considered to be sub judice. This is when continuing the investigation / other procedure would prejudice a criminal investigation or criminal Proceedings. There are a number of factors Police forces should consider when deciding whether a suspension is appropriate. The complainant must be notified in writing when the investigation / other procedure into their complaint is suspended and provided with an explanation for the decision. A complainant has the right to ask the IOPC to review that decision.

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

#### **Police Terminology**

**AA:** Appropriate Authority

**ANPR:** Automatic Number Plate Recognition

**ATOC:** (Association of Train Operating Companies) agreements.

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

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

**BWV :** Body Worn Video

**CAD:** Computer Aided Dispatch

**CCJ:** County Court Judgement

**DPS:** Directorate Professional Standards (Metropolitan Police Service)

## **NOT PROTECTIVELY MARKED**

**DSI:** Death or Serious Injury

**ECD:** Economic Crime Directorate

**FI:** Financial Investigator

**HCP:** Health Care Professionals

**IOPC:** Independent Office of Police Conduct

**LP:** Local Policing

**MIT:** Major Investigation Team

**MPS:** Metropolitan Police Service

**NFA:** No Further Action

**NLF:** National Lead Force

**NUT:** National Union of Teachers

**PCO:** Public Carriage Office

**PHV:** Private Hire Vehicle

**PMS:** Property Management System

**PNC:** Police National Computer

**POCA:** Proceeds of Crime Act

**PRI:** Practice Requiring Improvement

**P&T:** Professionalism and Trust

**SAR:** Subject Access Request

**SAR:** Suspicious Activity Report

**SIO:** Senior Investigating Officer

**SOP:** Standard Operating Procedure

**SO:** Specialist Operations

**STOT:** Safer Transport Operations Team

**TFG:** Tactical Firearms Group

**TfL:** Transport for London

**TPH:** Taxi and Private Hire

**niche:** City of London Crime and Intelligence Database

**IC Codes:**

IC1 – White – North European

IC2 – Dark European

IC3 – Black

IC4 – (South) Asian

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

IC6 – Arabic or North African

IC9 – Unknown

## Annex B – IOPC Annual Complaints Data Statistics

**Table 1** sets out full detail of IOPC data on complaints and allegations against the City of London Police in 2021/22. It is presented alongside national averages but it should be noted that City of London IOPC data includes complaints and allegations made about the Action Fraud reporting service, which means volumes and response times are not necessarily directly comparable.

<b>Table 1 – City of London Police complaints data 2021/22</b>		
<b>Metric</b>	<b>Figure</b>	<b>National average*</b>
Number of complaints logged (of which Action Fraud)	588 (451)	1705
Number of complaints logged per 1,000 employees	407	309
Number of allegations logged (of which Action Fraud)	680 (468)	2743
Number of allegations logged per 1,000 employees	471	700
Average time taken to log complaint	3 days	6 days
Average time taken to contact complainant	6 days	9 days
Number of complaint cases finalised – outside Schedule 3	428	872
Number of complaint cases finalised – inside Schedule 3	111	763
Average time taken to finalise complaint – outside Schedule 3	10 days	24 days
Average time taken to finalise complaint – inside Schedule 3	54 days	108 days
Applications for review received by local policing body – investigated	2	101
Applications for review received by local policing body – not investigated	1	13
Applications for review received by IOPC – investigated	2	18
Applications for review received by IOPC – not investigated	1	19
Number of allegations finalised by investigation under Section 3 – investigated (not subject to special procedures)	45	382
Number of allegations finalised by investigation under Section 3 – investigated (subject to special procedures)	0	31
Average time taken to finalise allegations – outside Schedule 3	8 days	21 days
Average time taken to finalise allegations – not investigated under Schedule 3	66 days	84 days
Average time taken to finalise allegations –by local investigation under Schedule 3	74 days	134 days

*\*Note that figures for the City of London include complaints and allegations about Action Fraud. This means they are not directly comparable to other forces data.*

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