Public Document Pack

Professional Standards & Integrity (Police) Committee

Date: **WEDNESDAY, 8 FEBRUARY 2023**

Time: 11.00 am

Venue: **COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL**

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

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

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Michael Cogher
Acting Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**

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

3. **MINUTES**

To agree the public minutes and non-public summary of the previous meeting of the Professional Standards and Integrity Committee held on 29th of November 2022.

For Decision
(Pages 5 - 8)

4. **REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 9 - 10)

5. **PROFESSIONAL STANDARDS BRIEF UPDATE ON ACTIVITY UNDERTAKEN TO ADDRESS POLICE PERPETRATED MISOGYNY, SEXUAL MISCONDUCT AND VIOLENCE AND AGAINST WOMEN AND GIRLS**

Report of the Commissioner.

For Information
(Pages 11 - 14)

6. **ACTION FRAUD STATISTICS – QUARTER 3 –1ST OCT 2022 – 31ST DEC 2022**

Report of the Commissioner.

For Information
(Pages 15 - 24)

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

Report of the Commissioner.

For Information
(Pages 25 - 56)

8. **QUARTERLY EQUALITY AND INCLUSION UPDATE**

Report of the Commissioner

For Information
(Pages 57 - 76)

9. **IOPC_CITY OF LONDON POLICE COMPLAINTS INFORMATION BULLETIN - Q2 202223**

Report of the Commissioner.

For Information
(Pages 77 - 94)

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

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

12. **EXCLUSION OF THE PUBLIC**

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

For Decision

13. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the previous meeting of the Professional Standards and Integrity Committee held on 29th of November 2022.

For Decision
(Pages 95 - 96)

14. **NON-PUBLIC REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 97 - 98)

15. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 3 – 1ST OCTOBER 2022 – 31ST DECEMBER 2022**

Report of the Commissioner.

For Information
(Pages 99 - 134)

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

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

PROFESSIONAL STANDARDS & INTEGRITY (POLICE) COMMITTEE
Tuesday, 29 November 2022

Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Tuesday, 29 November 2022 at 10.00 am

Present

Members:
Nicholas Bensted-Smith
Alderman Professor Emma Edhem
Jason Groves
Michael Mitchell (External Member)

Officers:

Paul Betts	-	Assistant Commissioner, City of London Police
Alix Newbold	-	Interim Police Authority Director
Rachael Waldron	-	Police Authority
Joseph Shadwell	-	Police Authority
Ian Younger	-	City of London Police
Carly Humphreys	-	City of London Police
Sanjay Anderson	-	City of London Police
Steven Kettle	-	City of London Police
Claire Cresswell	-	City of London Police
Hayley Williams	-	City of London Police

1. **APOLOGIES**
Apologies were received from the Chair Caroline Addy, Deputy Chair Deborah Oliver, Deputy James Thomson and Tijs Broeke.

In the absence of the Chair and the Deputy Chair the Committee agreed that Alderman Emma Edhem take the chair for the remainder of the meeting.

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

3. **MINUTES**
The Committee considered the public minutes of the previous meeting of the Professional Standards and Integrity Committee held on 26th of September 2022.

RESOLVED- That the public minutes of the previous meeting of the Professional Standards and Integrity Committee held on 26th of September 2022 be approved as an accurate record.

4. **OUTSTANDING REFERENCES**

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

RESOLVED - That the report be noted.

5. **UPDATE ON VIOLENCE AGAINST WOMEN AND GIRLS (VAWG) ACTIVITY**
The Committee received a report of the Commissioner which provided an update on the Violence against Women and Girls activity.

A Member observed how vital this work was and commented that this activity demonstrated the Force's commitment to tackling these issues giving the correct message to women who might be interested in joining the City of London Police.

Following a Member's query it was explained that there were implementation plans for this activity with both a national and local focus with regular liaison meetings established to ensure integration between the two.

The Committee was informed that the options for internships within the City of London Police from the legal profession were being explored and progressed accordingly.

RESOLVED- That the report be noted.

6. **QUARTERLY EQUALITY AND INCLUSION UPDATE**
The Committee received a report of the Commissioner on the which provided the Quarterly Equality and Inclusion Update.

In response to a Member's question on the activity to improve the numbers of staff happy to disclose their details for the Diversity Workforce Data Officers provided the action taken on this matter and agreed to update the Committee at its next meeting.

RESOLVED- That the report be noted.

7. **ACTION FRAUD STATISTICS – QUARTER 2 –1ST JULY 2022 – 30TH SEPT 2022**
The Committee received a report of the Commissioner on the Action Fraud Statistics Quarter 2, 1st July to 30th September 2022.

RESOLVED- That the report be noted.

8. **REVIEW OF THE BARONESS CASEY MISCONDUCT IN THE METROPOLITAN POLICE SERVICE- INTERIM REVIEW OF RECOMMENDATIONS FOR THE CITY OF LONDON POLICE**
The Committee received a report of the Commissioner regarding the Review of the Baroness Casey Misconduct in the Metropolitan Police Service Interim review of recommendations for the City of London Police.

In response to a Member's query Officers provided a detailed breakdown numbers of misconduct cases explaining that, given the low numbers within the City of London Police, the percentage changes were, somewhat, misleading. It was added that numbers of reported cases demonstrated that staff were now more comfortable reporting misconduct. Responding to this Members suggested that actual numbers be

provided alongside a percentages and noted the numbers of reported cases was evidence of an improved reporting culture but did not necessarily prove that there was an increase in instances of misconduct.

Following a Member's query Officers explained the mechanism for anonymous reporting.

Officers explained the next steps to be taken regarding this work with staff due to be hired specifically to coordinate the work going forward.

RESOLVED- That the report be noted.

9. **POLICE UPLIFT PROGRAMME- FOCUS ON DIVERSITY**
The Committee received a report of the Commissioner on the Police Uplift Programme Focus on Diversity.

Introducing the report Officers confirmed that the recent recruitment cohorts represented a more positive position regarding the diversity of staff hired but that work would continue to ensure progression on this important matter.

RESOLVED- That the report be noted.

10. **Q1 & Q2 STOP AND SEARCH AND USE OF FORCE UPDATE 2022-23**
The Committee received a report of the Commissioner which provided the Q1 and Q2 Stop and Search and Use of force update 2022-23.

Officers agreed, in response to a Member's query, to provide further details on the reasons for the decrease for Q1&2 compared to the previous year in Use of Force referenced in paragraph 24 of the report, to the next meeting of the Committee.

RESOLVED- That the report be noted.

11. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions received in the public session.

12. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
There were no items of urgent business considered in the public session.

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

14. **NON-PUBLIC MINUTES**
The Committee considered the non-public minutes of the previous meeting of the Professional Standards and Integrity Committee held on 26th of September 2022.

RESOLVED- That the non-public minutes of the previous meeting of the Professional Standards and Integrity Committee held on 26th of September 2022 be approved as an accurate record.

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

RESOLVED - That the report be noted.

16. **COLP REVIEW OF HISTORIC SEXUAL MISCONDUCT CASES- OP HOOD**
The Committee received a report of the Commissioner on the City of London Police Review of historic sexual misconduct cases Op Hood.

RESOLVED- that the report be noted

17. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 2 –1ST JULY 2022 – 30TH SEPT 2022**
The Committee received a report of the Commissioner on the Professional Standards Statistics Quarter 2 1st July 2022 30th Sept 2022.

RESOLVED- That the report be noted

18. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions considered in the non-public session.

19. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There was no urgent business considered in the non-public session.

The meeting ended at 10.56 am

Chair

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

PUBLIC OUTSTANDING REFERENCES

12/2022/P	**Item 10 Q1 & Q2 Stop and Search and Use of Force Update 2022-23**	Officers agreed to provide further details on the reasons for the decrease in Use of Force to the next meeting of the Committee.	Commissioner	**Complete-** As with Q2, Q3 is also showing a decrease in 'use of force' compared to the same period last year (a reduction of 10%) see para 23 of report on agenda. Supt Morgan comments that analytically, there is no obvious reason for this, however, cites 2 potential causes. 1- There are a number of orphaned reports in the system currently. This is being addressed through change to policy and training. 2- Anecdotally, although this is not evidenced by data- there has been an increase in probationer constables in the last year who may be less confident to go 'hands on' in the early stages of their training and deployments on duty.

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Committee(s): Professional Standards and Integrity Committee	**Dated:** 8 February 2023
Subject: Professional Standards brief update on activity undertaken to address police perpetrated misogyny, sexual misconduct and violence and against women and girls.	**Public**
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1- People are safe and feel safe
Does this proposal require extra revenue and/or capital spending?	**N/A**
If so, how much?	**N/A**
What is the source of Funding?	**N/A**
Has this Funding Source been agreed with the Chamberlain's Department?	**N/A**
Report of: Commissioner of Police Pol 28-23	**For Information**
Report author: Det Supt Claire Cresswell, PSD	

Summary

This report contains high level details describing key activity undertaken within the Professional Standards Directorate to address allegations of police perpetrated misogyny, sexual misconduct, domestic abuse and violence against women and girls.

Recommendation(s)

It is recommended that Members note the report.

Main report

1. The following activities have been conducted to support the investigation and detection of police perpetrated domestic abuse, sexual misconduct, misogyny and violence against women and girls. Whilst each of these activities have been detailed to the committee over the past eighteen months, it was considered appropriate to provide a reminder following the disturbing media reports over recent weeks relating to the Metropolitan police officer David Carrick pleading guilty to sex offences. The reporting has generated understandable public outrage and concern, which is why the department remains committed to delivering the highest standards of professional behaviour and to continue our work to prevent and robustly investigate such offences.

2. **Op Hood-** The force conducted a historical review of all cases of sexual misconduct and domestic abuse covering twenty years of data. This was

reported to Members at the Professional Standards and Integrity Committee (PSIC) meeting in November 2022. 16 key recommendations were made which are being progressed within the Professional Standards Department. Progress will be reported back to Members in May 2023.

3. **Baroness Casey review-** Baroness Casey completed her interim report on the Metropolitan Police Standards, culture and misconduct processes in October 2022. The City of London reviewed the force against the recommendations. A number of actions were identified and these now have strategic oversight through the force Professionalism and Trust Portfolio. This was also reported on at the PISC in November 2022.

4. **Internal reporting-** there has been an increase in conduct cases in this financial year. In 21/22 there were 11 conduct cases recorded. In the financial year to date 22/23 (with approximately two months to go) there have been 32 conduct cases reported. Many of these cases are as a result of increased internal reporting. This demonstrates staff awareness of the standards of professional behaviour and indicates trust in the force to appropriately investigate such allegations.

5. **Professionalism newsletter-** the quarterly professionalism newsletter continues to provide staff with information on learning from complaints and conduct, national cases of significance and activity or information that supports the Standards of Professional Behaviour and providing an exceptional policing service.

6. **Training-** The force is supporting mandatory training in the areas of domestic abuse and vulnerability. This is giving frontline staff the confidence to address domestic abuse appropriately. Since training has rolled out there has been a 61% increase in the number of public protection notices (PPNs) being completed by staff. These are filled out when a person identified as being at risk comes to notice of police. Active Bystander training is also being rolled out in 2023 to encourage staff to challenge inappropriate behaviour and to appropriately report it.

7. **Close working-** Staff from Vetting and Counter corruption unit now have bi-weekly meetings to understand each others risk, to share appropriate information and to ensure joint working arrangements continue as recommended by the HMICFRS. In addition Learning and Development and Professional Standards continue to work together on developing best practice, training requirements and setting standards of behaviour amongst new joiners. The head of Human Resources and the Head of Professional Standards work together on critical issues impacting staff and officers in relation to conduct and learning.

8. **The Corporate Services Review (CSR)-** the force is currently undertaking a Corporate Services Review to assess staffing requirements across the business area, and to ensure the right mechanisms are in place to support and efficient and effective service. The Professional Standards Department is a part of the business area under review. To support the increase in conduct cases,

the increased risk linked to this area, and the key strategic work the department now undertakes, the Senior Leadership Team have requested additional resources to support such activity.

9. **HMICFRS Vetting and Counter Corruption Units national recommendations-** the department has recruited a senior staff member to have strategic oversight of force delivery or the HMICFRS national recommendation for all Vetting and Counter Corruption Units. This will ensure that the best outcomes are achieved within the timeframes required nationally. An update on this work will be provided to Members.

10. **Op Hotton-** following the IOPC report into allegations of misogyny, bullying and harassment within the Metropolitan Police in September 2021, the City of London Police reviewed the force against the recommendations. A number of actions were identified and these now have strategic oversight through the force Organisational Learning Forum chaired by Commander Khan.

11. **National requirements for a historical data wash of staff through the police national database-** the force is supporting all national requirements to facilitate a historical data wash of City of London Police staff through the police national database to ensure any adverse traces identified are part of an individuals vetting considerations and that the force completes any required risk assessment linked to the information.

Conclusion

12. This report provides Members with a reminder of work that is ongoing to robustly investigate allegations of police perpetrated domestic abuse, sexual misconduct, misogyny and violence against women and girls. It provides Members with assurance that progress continues as expected in this area.

Contact
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Committee(s): Professional Standards and Integrity	**Dated:** 08022023
Subject: Action Fraud Statistics – Quarter 3 – 1st Oct 2022 – 31st Dec 2022	**Public**
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1- People are safe and feel safe
Does this proposal require extra revenue and/or capital spending?	**N/A**
If so, how much?	**N/A**
What is the source of Funding?	**N/A**
Has this Funding Source been agreed with the Chamberlain's Department?	**N/A**
Report of: Commissioner of Police	**For Information**
Report author: Det Supt Claire Cresswell / PC Ann Roberts Analyst - Professional Standards Department	

Please refer to Glossary provided (Appendixes)

Executive Overview

This document contains the statistics prepared by the Professional Standards Directorate and Action Fraud for the third quarter of 2022/23 (Oct to Dec).

Data	Following changes to the Misconduct Regulations there are now two full data set years for comparative data. All logged complaints include all dissatisfaction. Action Fraud data is referred to in the overall figures reported in the main PSI report to provide an overview of the Professional Standards Directorate workload, however the details have been removed and reported separately within this document.
Action Fraud complaints	Action Fraud – a National Service – continues to generate a greater volume of complaints than the City of London Police. This is a very small proportion against the volume of Action Fraud incident reports recorded. Complaint data has seen the number of complaint cases logged to a total of 130 in Q3. This is a increase against the previous quarter (40%) and above average against the previous 5 quarters. The complaints are broken down as 9 logged under Schedule 3, and 121 not within Schedule 3.

	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. The volume of logged complaints is extremely low compared to the number of fraud reports to Action Fraud. In Q3 of the 2022/23 financial year Action Fraud (AF) recorded 126,055 reports on the National Fraud Database consisting of 85,410 crime reports and 40,656. The complaint figures (total) represent 0.10% of the total number of Action Fraud reports recorded in Q3.
Nature of Allegations	Of the 129 allegations recorded during Q3 2022/23 the highest number was in the category of, A1 – Police action following contact (100) followed by followed by A3 – Information (13) and A4 – General level of Service 11)

	Reasons for complaint mostly relate to customer expectation of Action Fraud, with either the lack of contact or investigation cited.
Finalised Allegations	The total number of allegations finalised during Q3 is 115 compared to 101 in the previous quarter. Cases often contain more than one allegation; the number of cases finalised in Q3 is 142. 127 outside of Schedule 3 and 15 Schedule 3. Some of these cases will have allegations finalised in a previous quarter.
IOPC Reports	The IOPC has published the second annual complaint bulletin in the new format following the amendments to the Police Conduct Regulations. The IOPC quarterly bulletin in the same format has now been published (although they are currently a quarter behind) Q2 data is the most recent publication. The IOPC place a caveat to the City of London Police statistics to reflect the Action Fraud complaints as they are combined. A CoLP commentary sheet has been published alongside the IOPC bulletin on their website with an explanation regarding the combined statistics.
Appeals	None received.
IOPC investigations	There are currently no live IOPC investigations.

Content

Part A – Complaint Cases and Allegations

Table 1 - Quarterly comparisons for Complaint Cases
Table 2 - Quarterly comparisons for Allegations
Table 3 – Quarterly comparisons for Allegations Finalised

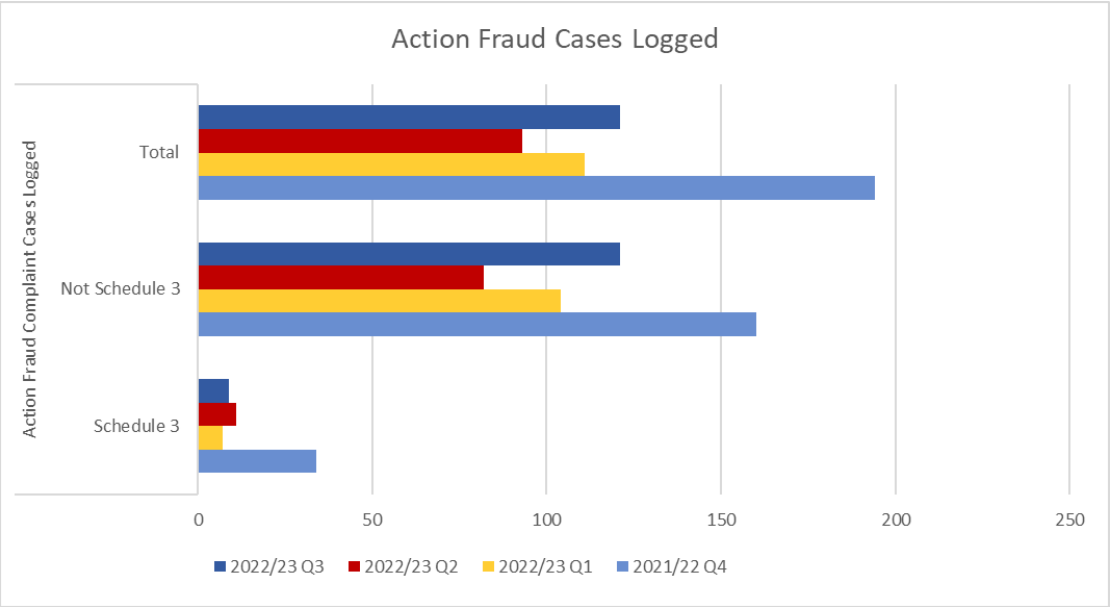
Part B - Appeals

Part C – IOPC

Part D – Learning

Part A – Complaints & Allegations

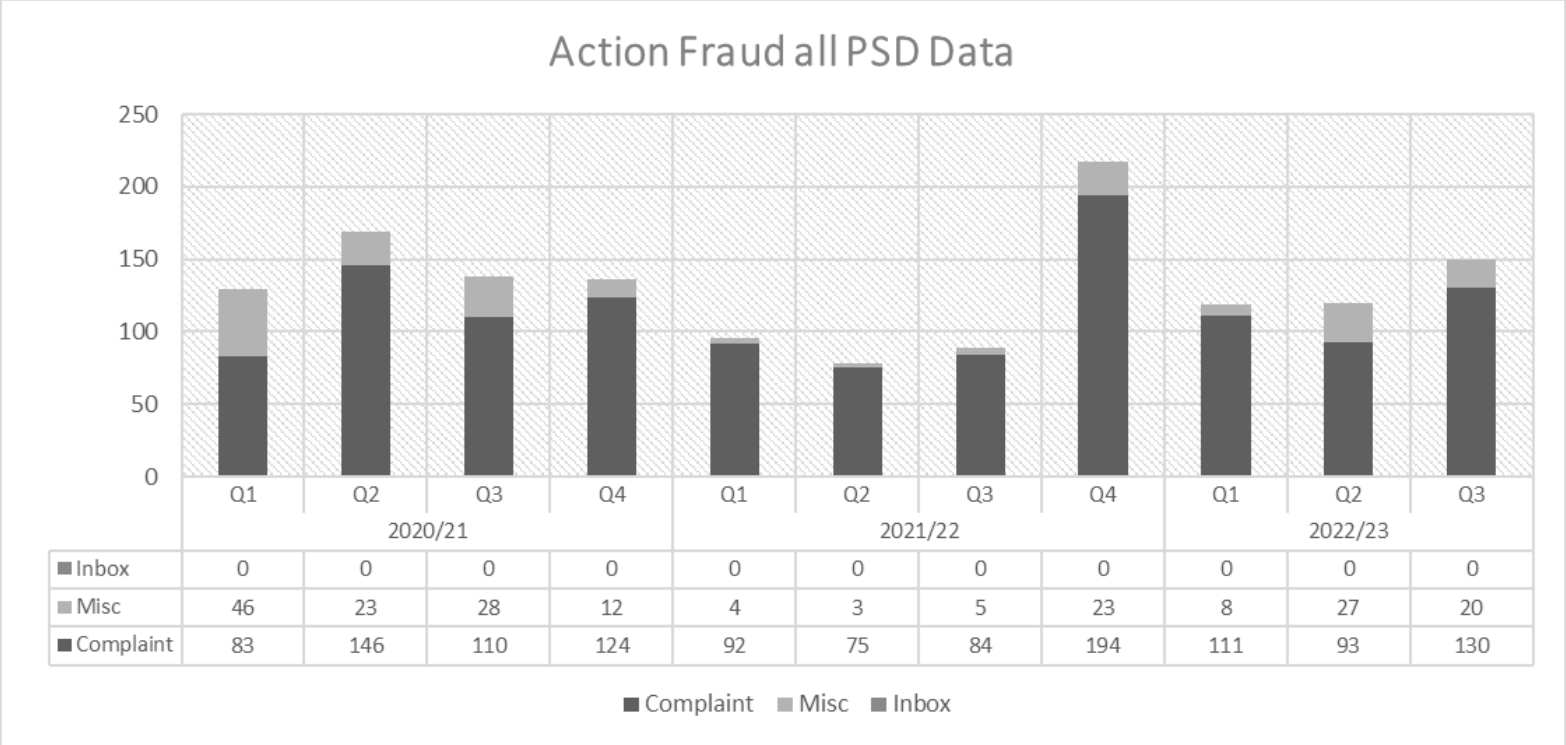
Table 1 - Quarterly Comparisons for Action Fraud Complaint Cases



- In Q3 of the 2022/23 financial year Action Fraud (AF) recorded 126,055 reports on the National Fraud Database consisting of 85,410 crime reports and 40,656 Information reports.
- The complaint figures (total) represent 0.10% of the total number of Action Fraud reports recorded in Q3.

- The number of Action Fraud complaints logged in Q3 2022/23 is 130 which is a increase of 37 (40%) from the previous quarter.
- 121 of these complaints fell outside of Schedule 3, 9 were within Schedule 3.
- Recording standards require all customer dissatisfaction to be logged and the volume of reporting. At the beginning of 2022 (Q4) a decision was taken to record all Action Fraud complaints received by PSD and those received directly by the Action Fraud team. This is to ensure an accurate record is kept of the demand being dealt with and also enables relevant cases to be escalated to be dealt with under Schedule 3 timely. Q4 absorbed some backlog and increased data for this period.
- Since Q1 2022/23 PSD have been trying to obtain access to AF's system in order to extract complaint data directly but there are ongoing issues with this. Due to the external demand placed on the AF team and PSD access to data issues, PSD aren't being provided with the data, therefore some complaint data is not logged. Once the issues have been resolved PSD can recommence logging these AF complaints again.
- Additional information has been added to the AF website, which answers identified key complainants' frustrations. This informs potential complainants that the complaints process is not a mechanism to overturn the decision of NFIB, not to review and forward to a force for their consideration.

Table 2 - Quarterly Comparisons for Action Fraud Allegations



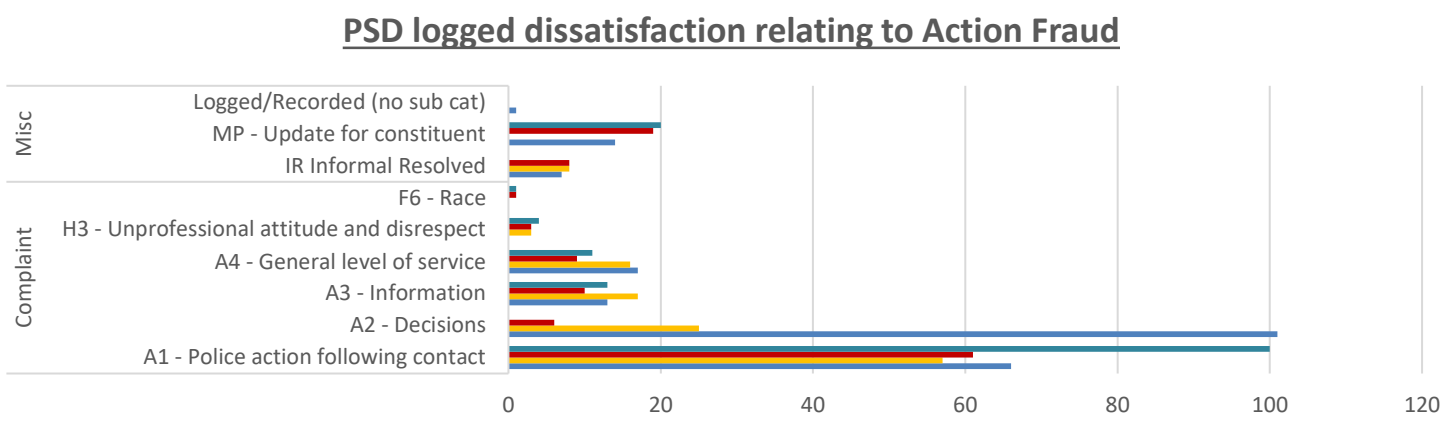
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
	2020/21				2021/22				2022/23		
Inbox	0	0	0	0	0	0	0	0	0	0	0
Misc	46	23	28	12	4	3	5	23	8	27	20
Complaint	83	146	110	124	92	75	84	194	111	93	130

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

Due to these changes to recording standards, at the beginning of 2022 (Q4) a decision was taken to record all Action Fraud complaints received by both PSD and those received directly by the Action Fraud team. This is to ensure an accurate record is kept of the demand being dealt with and also enables relevant cases to be escalated to be dealt with under Schedule 3 in a timely manner. This increase in complaints is reflected in the data (Q4). The upward trend in AF complaints is likely to continue or to show a plateauing over the forthcoming quarters. Positive changes to the AF website and overall communication strategy surrounding the AF service will assist in maintaining low complaints (compared to the volume of crime reports) of this national service. Q3 compared against previous quarters is above average against the previous 5 quarters, this is likely caused by a catch up in logging data.

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

Table 2 - Quarterly Comparisons for Action Fraud Allegations Recorded – Q3



	Complaint						Misc		
	A1 - Police action following contact	A2 - Decisions	A3 - Information	A4 - General level of service	H3 - Unprofessional attitude and disrespect	F6 - Race	IR Informal Resolved	MP - Update for constituent	Logged/Recorded (no sub cat)
2022/23 Q3	100	0	13	11	4	1	0	20	0
2022/23 Q2	61	6	10	9	3	1	8	19	0
2022/23 Q1	57	25	17	16	3	0	8	0	0
2021/22 Q4	66	101	13	17	0	0	7	14	1

Themes of complaints received

An analysis of complaints and dissatisfaction reports received over the previous 12 months, has been undertaken, detailed below. The highlighted ones are the top 3, most commonly received.

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

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

- Of the 129 allegations recorded during Q3 2022/23, Police action following contact was the highest category with 100, followed by Information 13, followed by General level of service 11. The graph visualises the trend of 'Police action following contact' over the rolling yearly data being the constantly highest category.

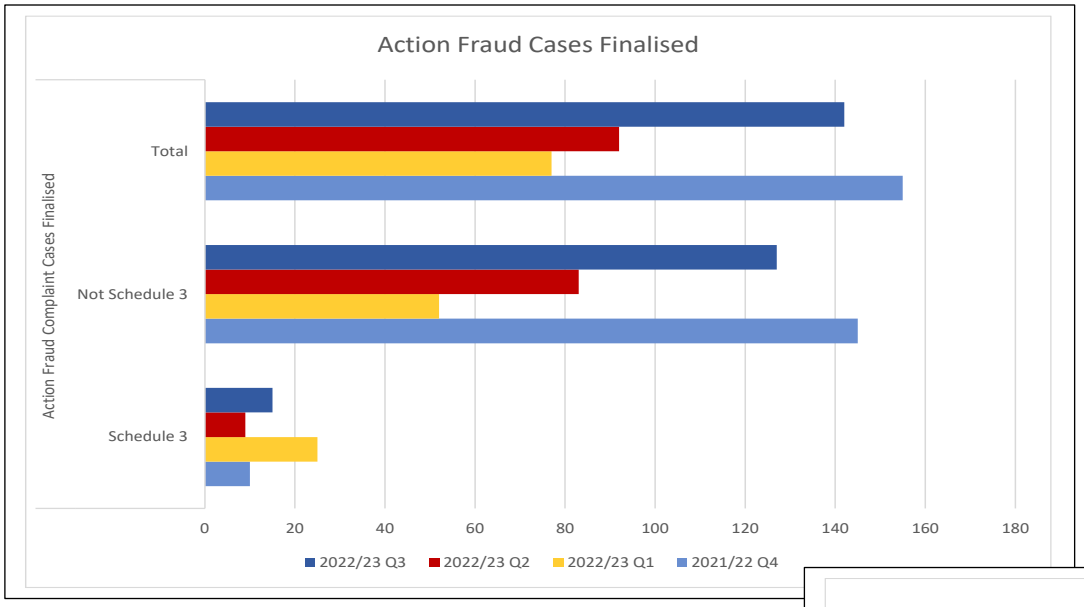
- Miscellaneous cases are being logged where members of parliament are making contact on behalf of constituents or if not clear if a complaint is being made. This number had dropped since letters explaining the AF system have been written to all Members of Parliament, and the changes to the recording standards in the regulations.

- The IOPC has published the yearly bulletin covering 2021/22. This includes AF data and is not separated out from CoLP complaint data. A commentary sheet has been included with this bulletin on the IOPC website to explain the data.

- The IOPC are now able to publish new quarterly bulletins most recent Q2 data. AF cannot be compared against any other National data, as being a unique service. The quarterly bulletins amalgamate both CoLP and AF data together which is unhelpful to provide context to either compared to other Force complaint data.

Professional Standards and Integrity Report Feb 2023

Table 3 – Finalised – Cases and Allegations – Q3

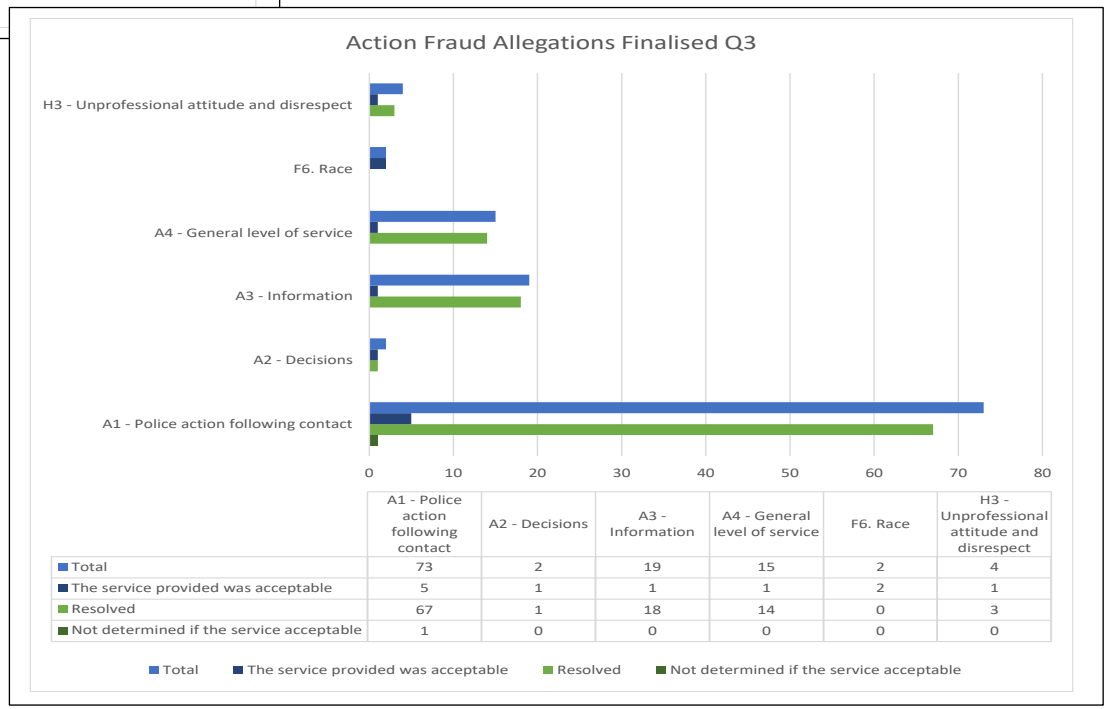


AF Finalised Cases: -

- 142 Action Fraud cases have been finalised during the Q3 2022/23.
- 127 fell outside of Schedule 3.
  15 fell within Schedule 3.
- Q3 saw finalisations increase by 50 cases (60%) against the previous quarter.
- Some allegations from these cases have been finalised outside of this quarterly period.

AF Finalised Allegations: -

- 115 allegations have been finalised in Q3 2022/23.
- No outcomes were found that the Service provided was not acceptable.
- 103 (90%) allegations were Resolved.
  11 allegations Service was found to be acceptable.
  1 where the allegation was not determined if service was acceptable.



	A1 - Police action following contact	A2 - Decisions	A3 - Information	A4 - General level of service	F6. Race	H3 - Unprofessional attitude and disrespect
Total	73	2	19	15	2	4
The service provided was acceptable	5	1	1	1	2	1
Resolved	67	1	18	14	0	3
Not determined if the service acceptable	1	0	0	0	0	0

Part B –Appeals

None

Part C - IOPC

No cases been brought to the attention of IOPC

Part D –Learning

Action Fraud Complaints

- Additional information has been added to the AF website, which answers identified key complainants' frustrations. This informs potential complainants that the complaints process is not a mechanism to overturn the decision of NFIB not to review or forward to a force for their consideration.

- To increase service delivery/service recovery, more complainants are being telephoned to discuss their complaint. This is well received and alleviates the need for written communication.

- Within conversations, and included in written communication, crime prevention advice is now provided with details of other agencies that maybe best placed to deal with their dissatisfaction. This has increased the number of complaints dealt with outside of schedule 3, therefore reducing demand and resource required and ensuring that complainants receive the most appropriate advice and response.

- MP's and Home office have been provided with Q&A's, that fully explain the role of AF and NFIB, and the remit of the complaints process. This has reduced the amount of MP letters being received as MP's and Home Office are able to engage with their constituents, without the need to forward their issues to PSD.

- 28 day update template letter from AF has been changed to better inform victims why their report is not referred for investigation. This is designed to overcome the problem with the current template saying that there are 'no viable lines of enquiry' when the victim feels there are, which has been generating complaints (even though this is addressed in the FAQs on the AF website).

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Committee(s): Professional Standards and Integrity Committee	**Dated:** 8 February 2023
Subject: Q3 Stop and Search and Use of Force Update	**Public**
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1- People are Safe and Feel Safe
Does this proposal require extra revenue and/or capital spending?	**N/A**
If so, how much?	**N/A**
What is the source of Funding?	**N/A**
Has this Funding Source been agreed with the Chamberlain's Department?	**N/A**
Report of: Commissioner of Police Pol 30-23	**For Information**
Report author: Superintendent Bill Duffy, Head of City Police Task Force & Head of Contact; Head of Sector & Response Policing	

Summary

This report covers Q3 of FY 22/23.

The use of Stop/Search powers, and the Use of Force, remains broadly in line with the established trends previously reported to the Committee last meeting.

There have been 526 stop searches during the reporting period. This led to 178 arrests.

Taser use remains in established trends. There were 28 uses of Taser recorded this period, including 1 discharged, and no uses involving Juveniles.

There have been no Section 60 Stop Searches conducted in this quarter.

There have been no juvenile strip searches conducted in this quarter.

19 Strip searches conducted (84% Misuse of Drugs Act)

32 Juveniles stop search (69% Going Equipped or Offensive Weapon)

763 'Use of force' forms completed (68% involved arrest)

Recommendation

Members are asked to note the report.

Main Report

Background

1. This is the Police's routine report to inform members of the overarching trends relating to the use of Stop/Search powers and the Use of Force by officers. A full data pack is attached to the report at Appendix 1. The report provides an overview of the key trends, and an analysis of key aspects of the use of these powers.

Current Position – Stop Search

2. Over quarter 3 of FY 22/23, the force conducted 526 Stop/Searches, leading to 178 arrests. Overall, the positive outcome rate for this period was 44%. This compares to 613 stop/searches in the same period in FY 21/22 (down 14%)

3. Over the same comparator period the positive outcome rate was lower at 37%, whilst the number of arrests was lower at 154 (a change of - 13%). Members are reminded that positive outcome is recorded where there is a positive outcome following the search: this can include finding the object of the search; finding another prohibited item which was not the object of the search; or arrest (directly linked to the search or for other offences) (this is not an exhaustive list). As such, the positive outcome rate will always vary from the arrest or find rates.

4. There have been no searches conducted under s.60 authorities over this reporting period and no s.60 authorities have been granted. This compared to 0 search conducted in the same period in FY 21/22 (conducted in the MPS force area under an MPS authority).

5. Over this reporting period 32 juveniles (<10-17yrs>) have been searched. Of these, the majority (69%) where searched for going equipped, possession of a weapon (including 3 for possession of a firearm) or stolen property: 31% were searched for drugs. In contrast, in the adult population the majority of searches where conducted for drugs (59%), with 15% of the population being searched for going equipped etc. This is in line with the established trend, which sees the majority of searches overall being conducted for drugs, but within the juvenile cohort the main reason for searches being offensive weapons and going equipped.

6. For the current reporting period, the disproportionality for black members of the community was 2.02 (compared to 2.95 in the comparator period). This is within the established trend of between 1.9 and 2.5 over the preceding two years. Of black individuals stopped, the majority (62.9%) where searched for drugs, which is broadly in line with the adult population as a whole, whilst 37.1% were searched for going equipped etc., which is slightly higher than the adult population as a whole. However, this does represent an increase on the same period last year, where 53% of black individuals stopped where searched for drugs, with a 40% positive outcome rate (and 29% arrested). In contrast for this reporting period there was a 53% positive outcome rate (and 29% where arrested). More black members of the community were stopped in this reporting period 62 compared to the previous year (56).

7. For Asian individuals, the disproportionality has decreased from 1.2 in the comparator period to 0.7 in this reporting period. The majority of Asian individuals

searched (82%) where searched for drugs, which is at odds with the adult population as a whole. However, when searches leading to arrests are considered in isolation, the disproportionality for Asian individuals falls to 0.7.

8. Searches under s.23 of the Misuse of Drugs Act continue to account for the majority of stop/searches, in line with the established trend. Searches under this power have an average positive outcome rate, with items being found in 48% of searches (drugs being found in 41% of searches and other items in 5%).

9. **Strip Searches.** Members are reminded that stop/search legislation affords power to require the removal of different levels of clothing. For searches conducted on the street, only 'JOG' items (jacket, outer-garment, gloves) maybe removed. If more than 'JOG' items are removed, then the search constitutes a 'strip search' and must be recorded as such. There are two levels of strip search. A 'more thorough search' which can involve the removal of more than JOG items but not require the removal of underwear. A more thorough search must be conducted out of public view (this can include inside a police vehicle). If underwear is removed, this constitutes an 'intimate parts exposed' search. Such a search may only be conducted in a police station.

10. Force policy is that a supervisor must be consulted and agree with the search (under legislation they are only required to be informed). Juveniles may be strip searched, but although there are no additional legislative bars which must be cleared to conduct such a search, in practise for it to be proportionate the grounds for such a search must be significant and robust, and recorded as such. When a juvenile is subject to any degree of strip search an appropriate adult should be present unless there is an overwhelming reason to conduct the search in their absence (for example, suspecting that the subject is concealing a weapon with the intention to hurt themselves or another person).

11. As set out in our Q4 FY21/22 report, we will report on Strip/Searches in each of our reports to this committee.

12. Over this reporting period we conducted 19 strip searches, of which 1 constituted a more thorough search and 18 an intimate parts exposed search (this compares to 29 in the comparator reporting period, of which 2 where more through searches and 27 intimate parts exposed).

13. The majority (84%) of strip searches were conducted under Misuse of Drugs Act powers, with 3 being conducted where the subject was thought to be going equipped or in possession of stolen goods.

14. Strip Searches may also be conducted in Custody, under separate powers within the Police and Criminal Evidence Act 1984. These are not conducted under Stop/Search powers, and are not recorded within Stop/Search statistics, or covered by this report.

15. **Juvenile Strip Search.** No under 18s were strip searched in this reporting period. As previously reported to the Committee, we will provide detail of any U18 strip searches in this report in future.

16. **Dip Sampling.** The Force introduced a revised Standard Operating Procedure for the dip sampling of Stop/Search records in November 2021. As previously reported to this Committee, after an initial bedding in period in Nov and Dec 21, the new process became fully established from Jan 22. The Force aims to achieve a 10-20% dip sampling rate, which is in addition to the 100% supervision of all Stop/Search and Use of Force reports by frontline supervisors. In addition to this, the Independent Advisory and Scrutiny Group (IASG) independently reviews a sample of stop/search record (and associated Use of Force records) each month, averaging approximately an 8-9% sampling rate. In November 2022 we introduced a further layer of review, with IASG members reviewed the Body Worn Video (BWV) recordings of two of the records they had previously dip sampled. This process will continue over the coming months, and we will report to the committee once it has fully bedded in and there is sufficient data to provide an analysis of any trends emerging from this work.

17. Over the year to date (as at 31 Jan 23) the Force has recorded 2382 Stop/Searches, and we have internally dip sampled 168 of this: a sample rate of 7.05%. For Q3, we recorded 526 Stop/Searches and reviewed through dip sampling 62, giving a sampling rate of 12%.

18. The proportionate split between s23 Misuse of Drugs Act and s1 Police and Criminal Evidence Act records sampled is broadly in line with the split over the cohort as a whole (as set out above).

19. In Jun 22 we introduced a change in the dip sampling process, requiring supervisors to rate each record they reviewed on a scale from 1 to 10. The scale is set out below. This change was introduced mid-month, so complete records for reviews against this new scale are only available for Q2 onwards.

    a. **1 – Poor.** Very poor record or unlawful use of power.

    b. **2-4 – Areas for significant improvement.** Serious omissions or errors with the conduct of the search.

    c. **5 – Satisfactory.** Search was conducted lawfully, and record is complete.

    d. **6 – Good.** Search is conducted lawfully, record is complete, and officer acted in a professional manner.

    e. **7-9 – Very Good.** Search is conducted lawfully, record is complete and accurate, and officer demonstrates very good professional standards, such as how they communicate with the subject, the respect shown the subject or their ability to de-escalate a situation.

    f. **10 – Excellent.** An exemplar of how to conduct a Stop/Search in all respects which could be used for training purposes with new recruits.

20. For Q3 FY22/23, 3.6% of records reviewed scored 5 or above (168 records), 16% of records reviewed scored 6, 55% scored Very Good and 7.7% scored Excellent.

21. Of the 10 records which failed to meet the standard, one record was scored as 1, and 9 records scored 4.

22. The record which scored 1 was reviewed by the first and second-line manager. The officer received refresher training, has a stop search mentor and all stop searches are supervised.

Current Position – Use of Force

23. Over this reporting period, a total of 763 uses of force where recorded, compared to 851 over the same period last year, decrease of 10%. In this reporting period, 68% of uses of force involved arrests, compared to 64% in the same period last year, and handcuffing remains the largest single use of force by a large margin.

24. Over this reporting period, batons have been used once (1) and no police dogs been deployed. A total of 2 officers were injured in incidents involving the use of force, 15 officers were assaulted but received no injuries (10 in Q3 FY 21/22), and 14 subjects were injured as a result of the use of force (17 in Q3 FY 21/22): 1 resulting in a referral to PSD. This complaint was reviewed and dealt with by local management within Local Policing and the resolution accepted by the complainant.

25. Force remains most used against male subject (90% this reporting period compared to 75% in the comparable period FY21/22).

26. Disproportionality for Asian subjects in use of force has changed at 0.70 this reporting period from 1.21 in the comparator period. For black individuals, the disproportionality has fallen from 2.95 in the comparator period to 2.02 in this reporting period. The proportion of use of force incidents involving black subjects leading to arrest is approximately the same as the population as a whole (68%). Similarly, the likelihood of taser being used is broadly higher: 5.5 % for black subjects, 3.6% for the population as a whole.

27. **Taser.** Over the reporting period the Force recorded 28 uses of Taser, and 1 taser discharge. This compares to 28 in the comparator period, with no discharges. Committee members are reminded that a use of a taser is recorded whenever an officer draws it from the holster, aims it, activates the laser ‘red dot’ sighting system or draws a subject’s attention to the device with an “Arc Display” (showing the arching of electricity across the front of the device). Firing, or discharge, is recorded separately.

28. Of these 28 Taser incidents, none involved Juveniles –

Conclusion

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

Appendices
Appendix 1- Data pack

Bill Duffy
Superintendent
Force lead for Stop/Search and Use of Force

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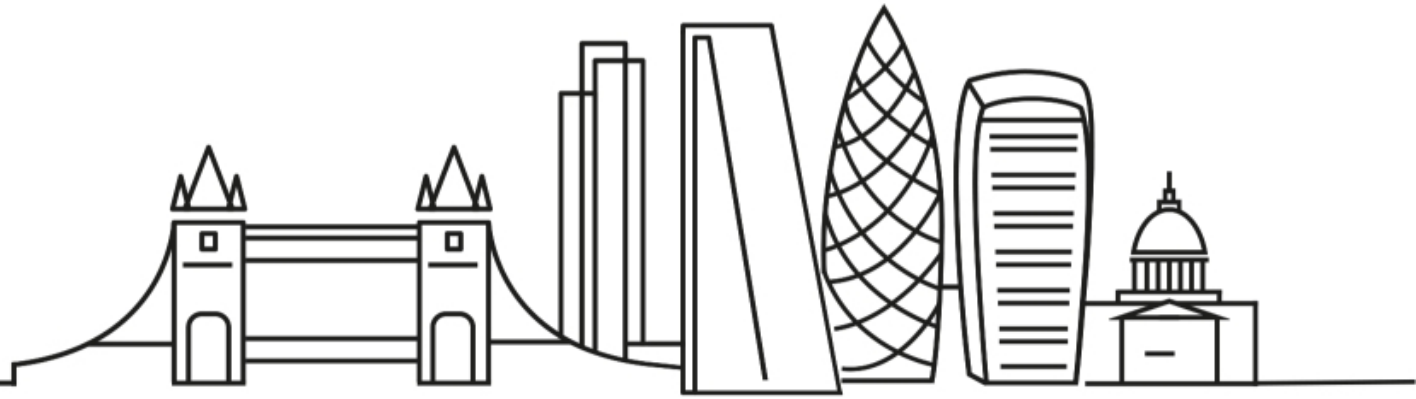
CITY OF LONDON POLICE

Stop & Search Overview Q3 2021/22

1st October 2022 – 31st December 2022



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Overview

CITY OF LONDON POLICE

01/10/2022 31/12/2022

Stop and Searches Carried Out

526

Items Found

215

Arrests Made

178

Positive Outcome Rate

44%

Searches of Juveniles (10-17yrs)

32

Strip Searches

19

Clothing Removed

All

Section 60 Stops

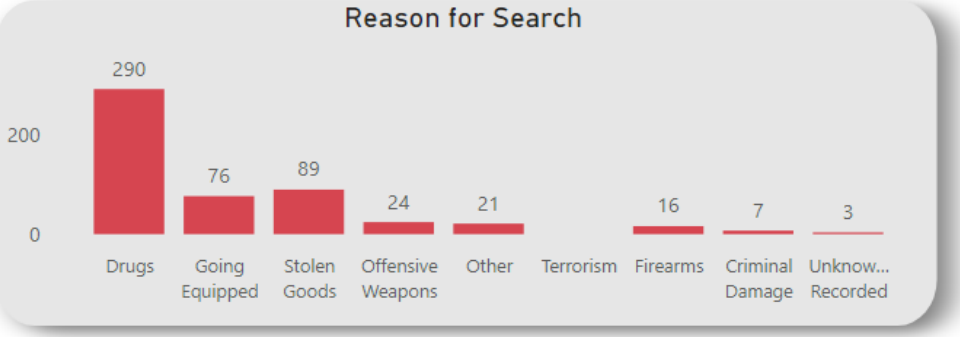
0

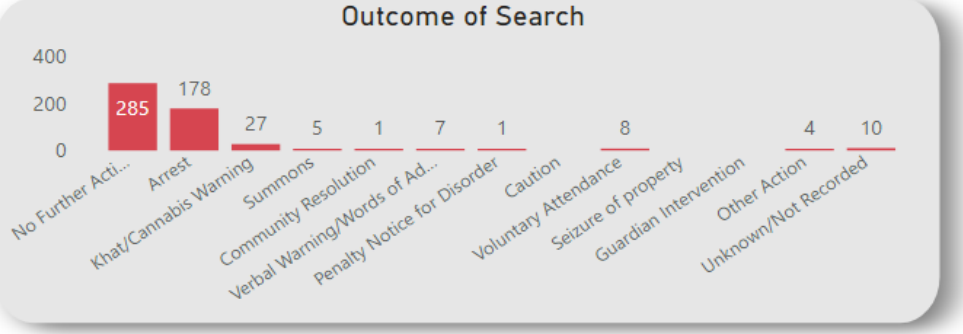
Khat Stops

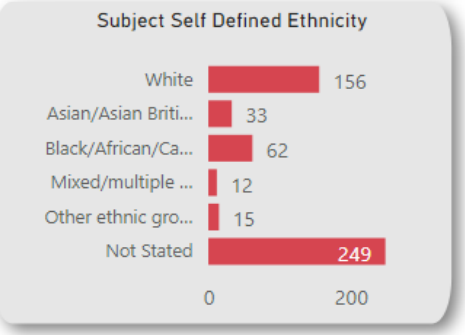
0

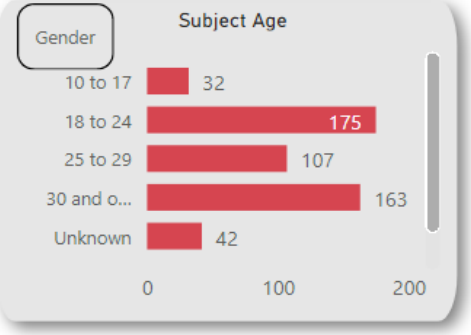
Stops in Other Force Areas

59









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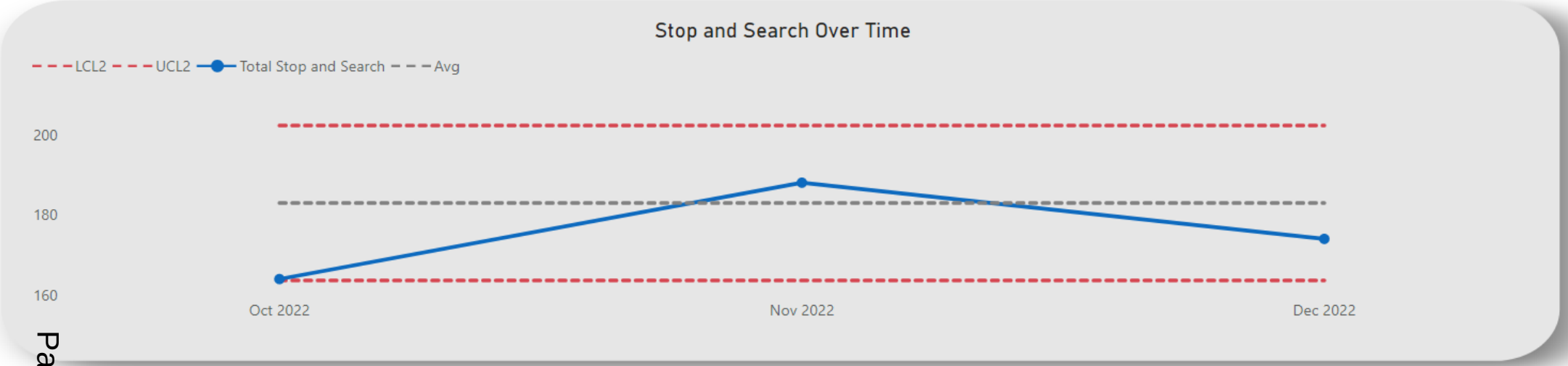
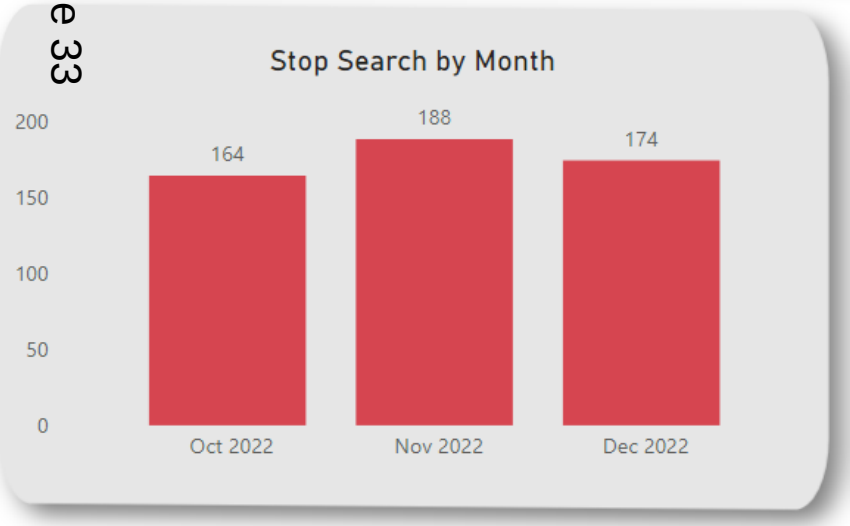
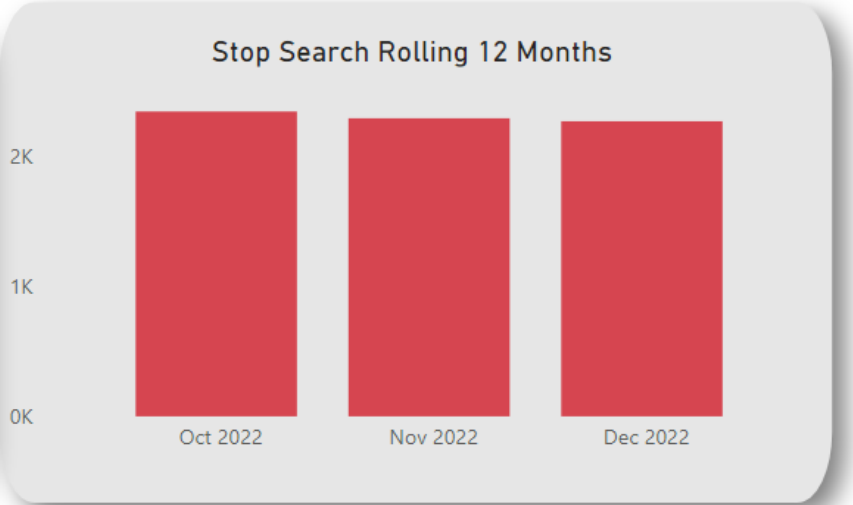
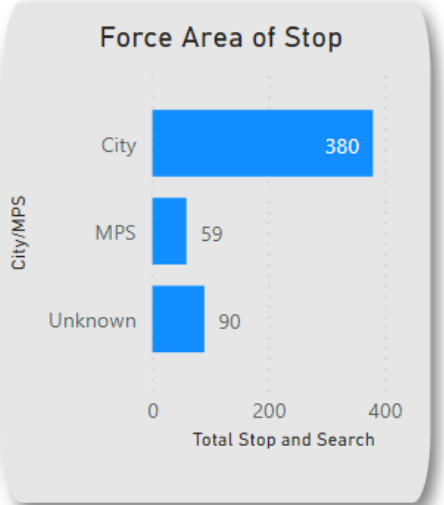
1. Monthly Breakdown

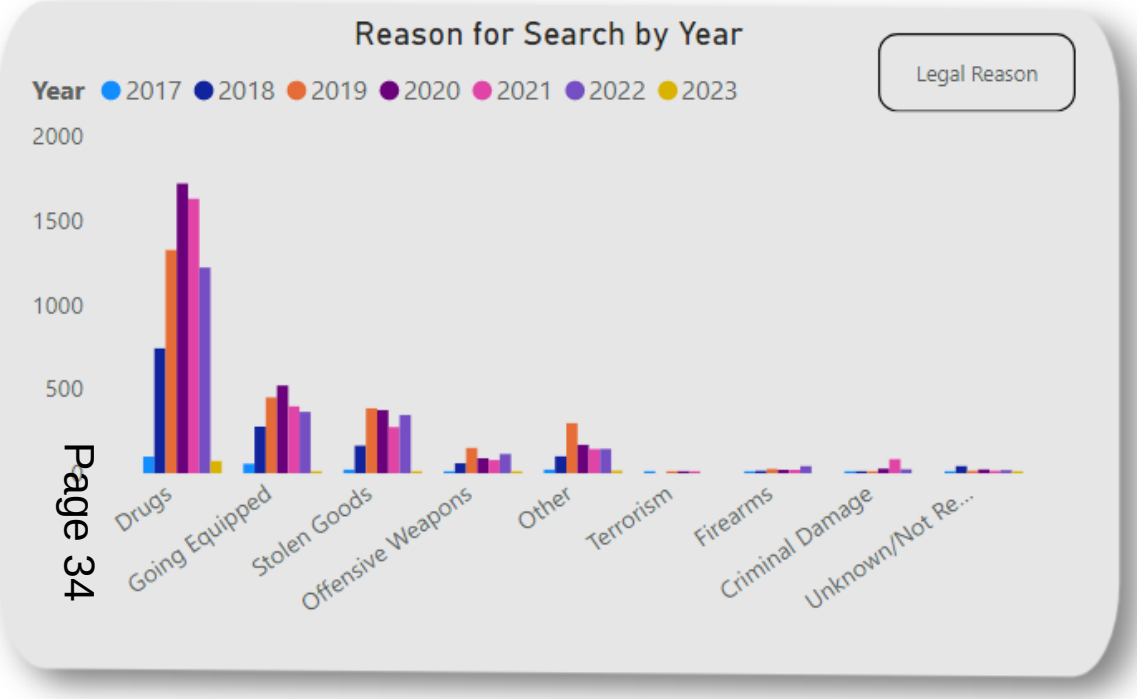


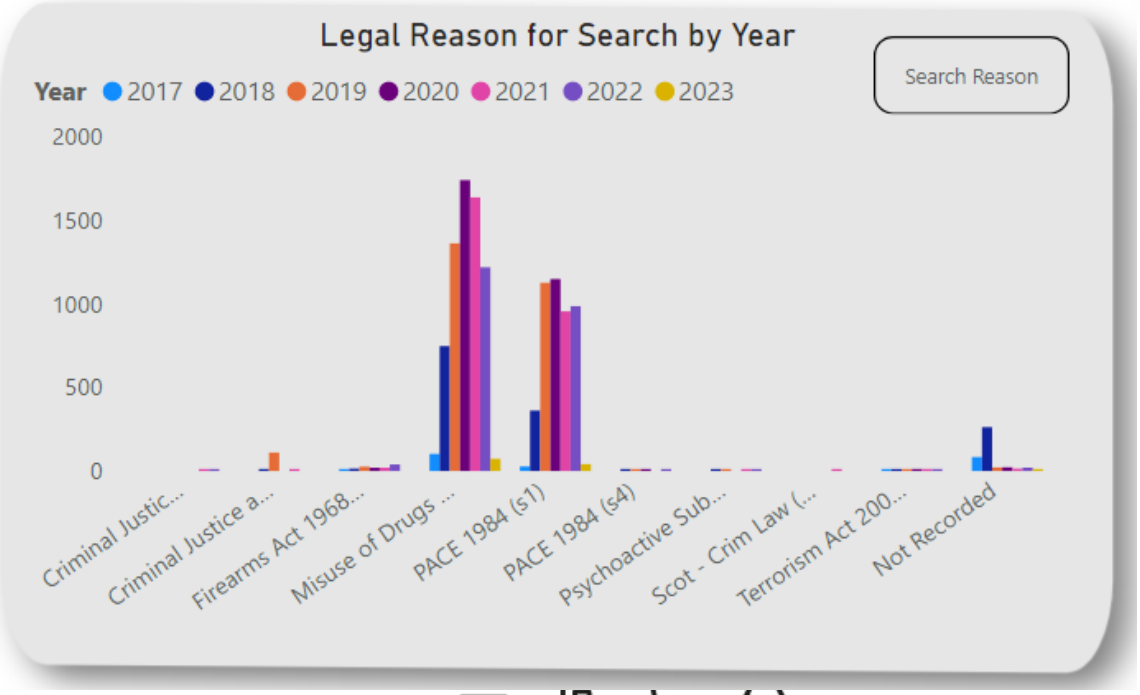




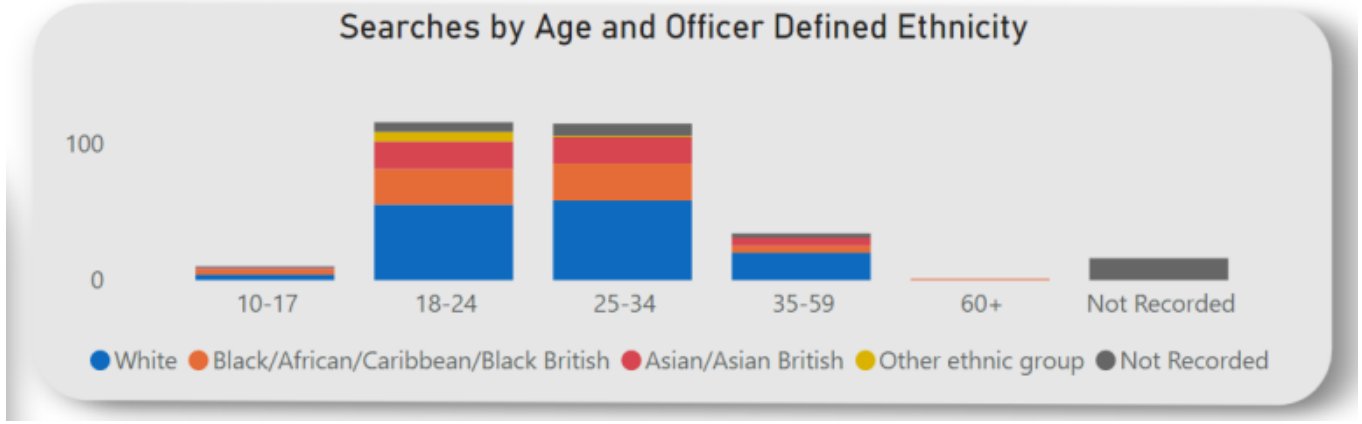


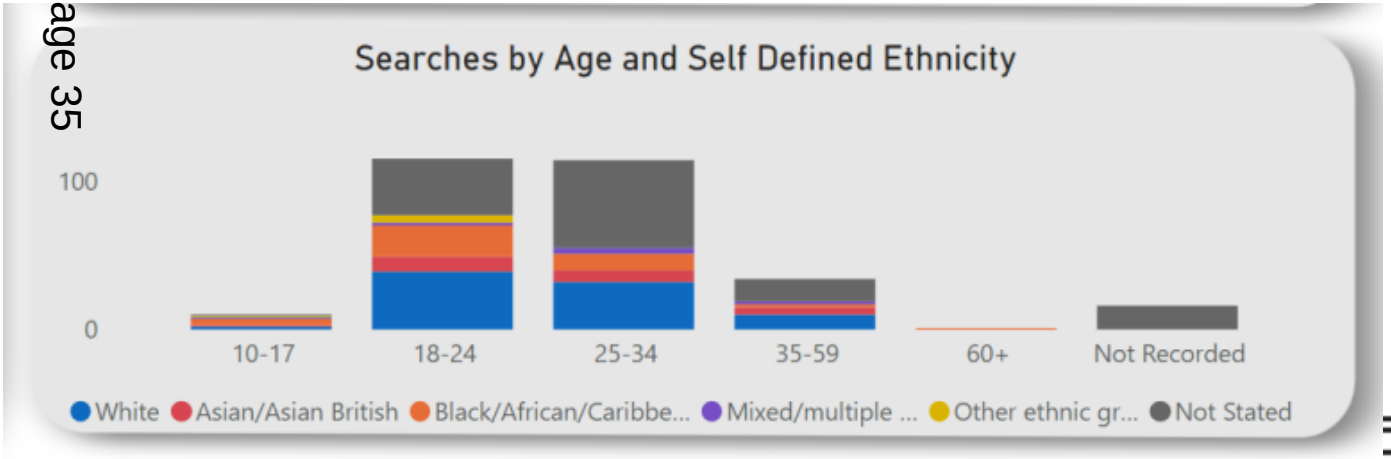
2. Reason for the Stop



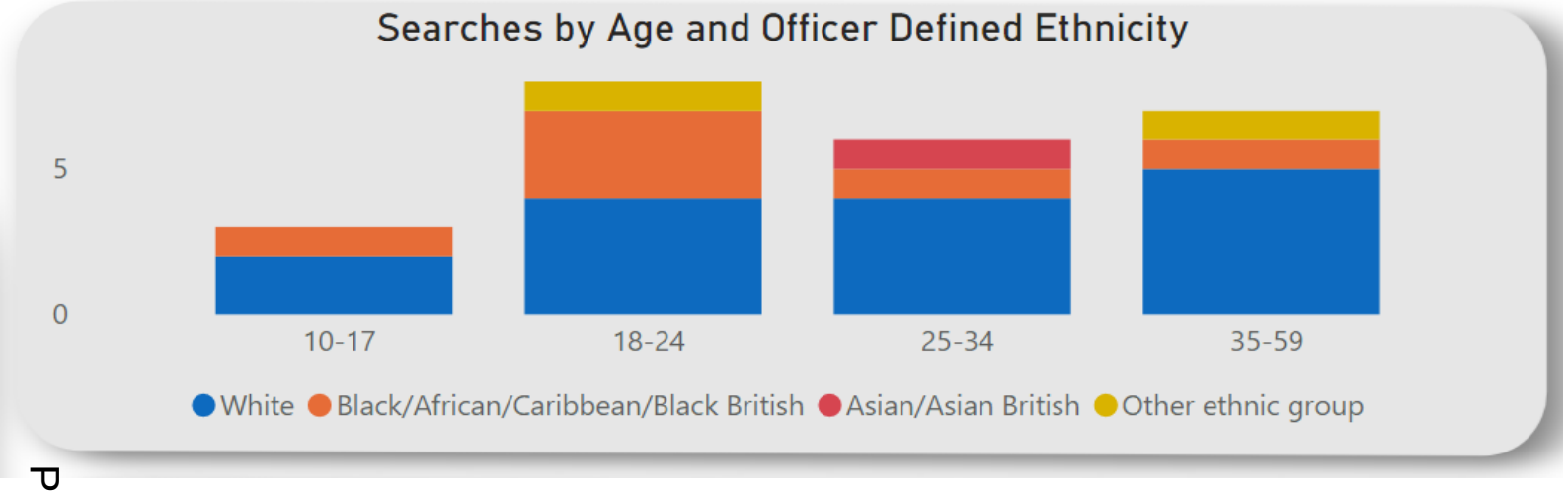


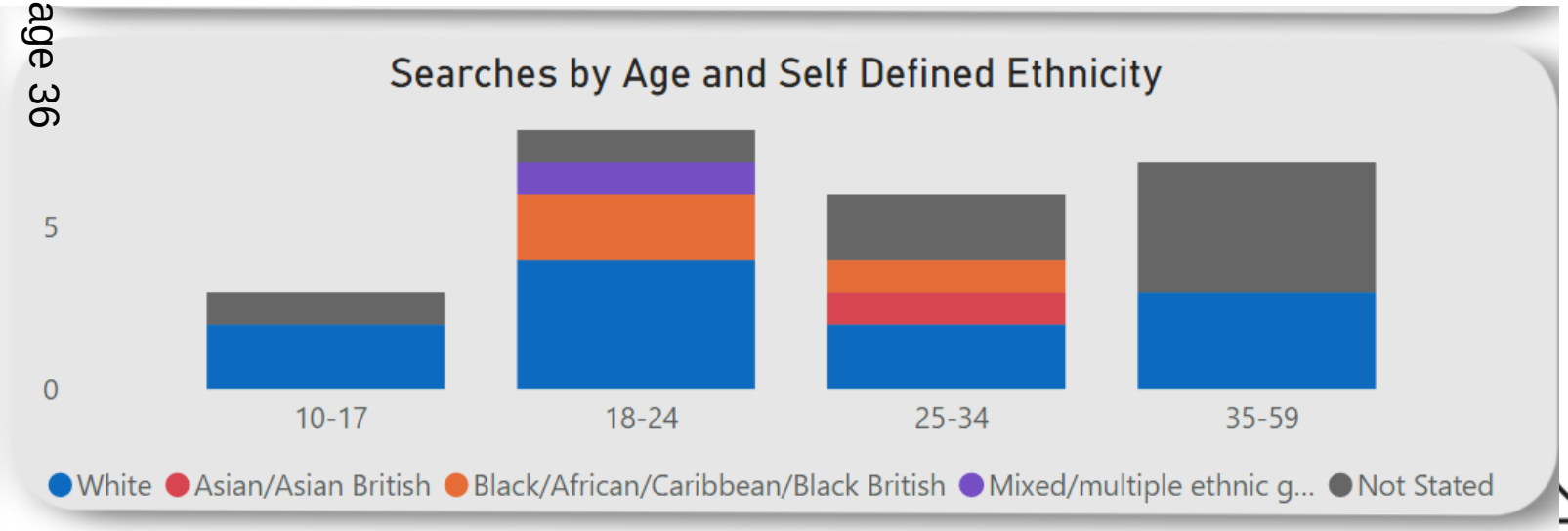
2. Reason for the Stop: Drugs Searches





2. Reason for the Stop: Offensive Weapons and Firearms



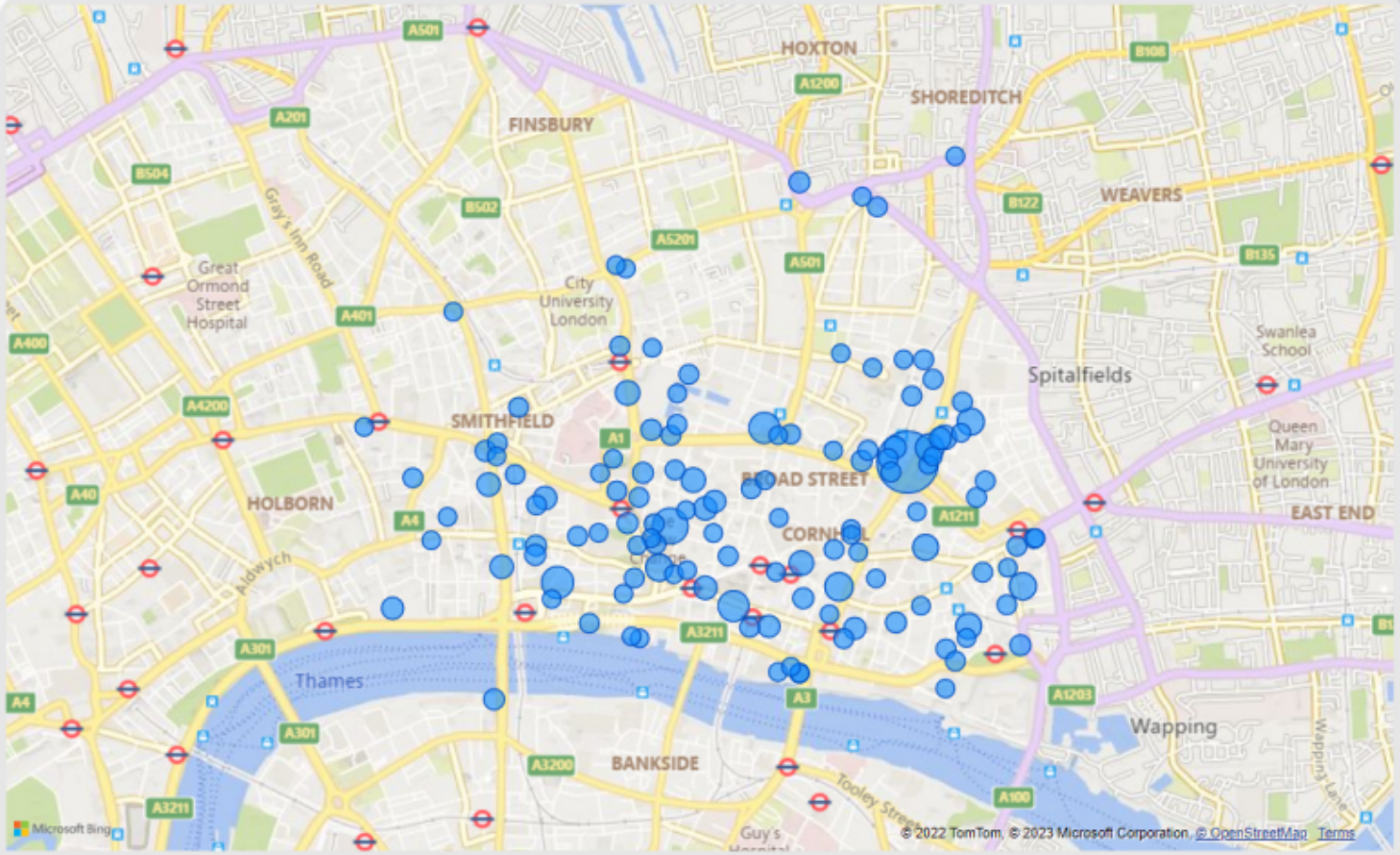


3. Time and Location of Stop

CITY OF LONDON POLICE

Heatmap - by Time of Stop

3. Time and Location of Stop

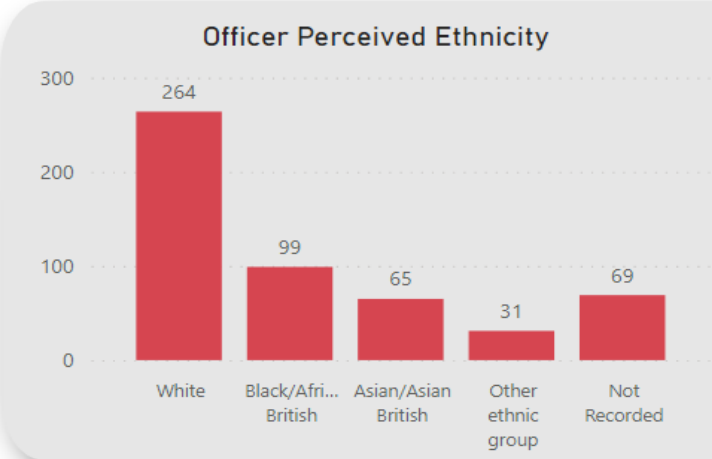


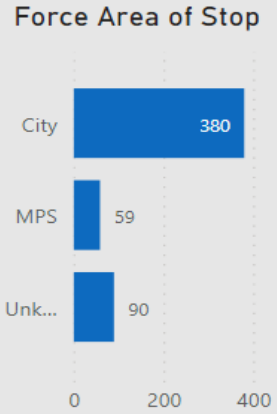
Note: when there is more than one stop and search for a single location, the tooltip will show the first value for each field for that location (they may not necessarily come from the same record).

4. Ethnicity

01/10/2022 31/12/2022

Black	Asian	Other
1.7	0.8	0.8





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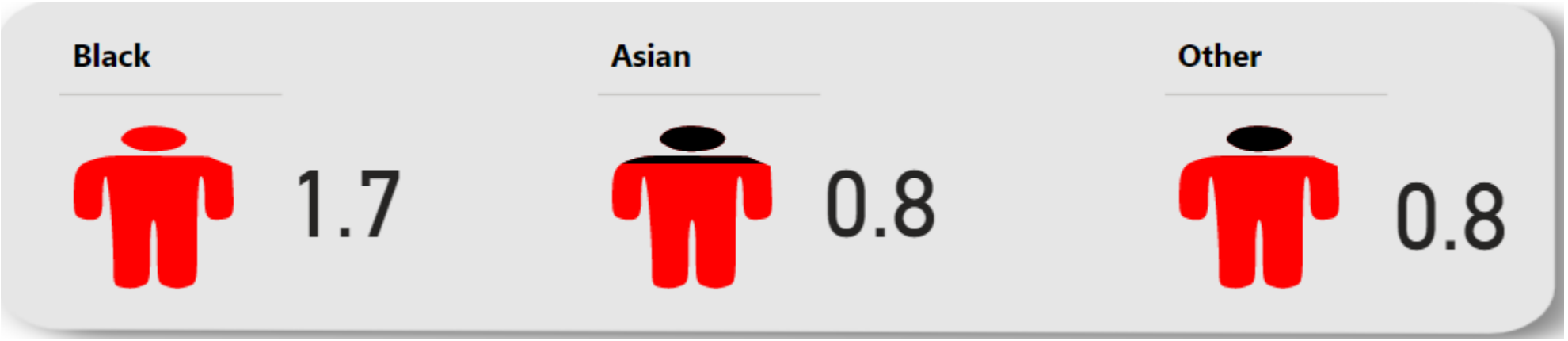
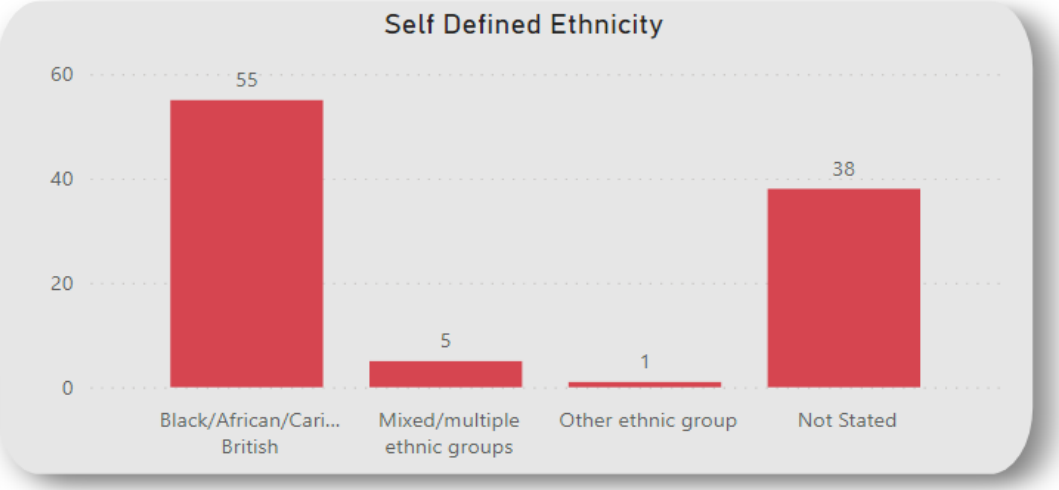
5. Disproportionality

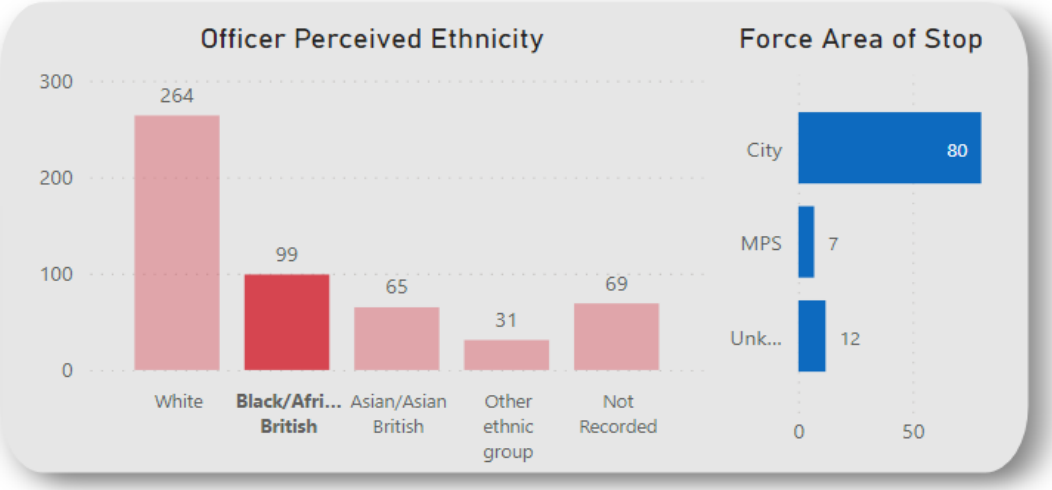


6. Breakdown by Ethnicity: Black

01/10/2022 31/12/2022

Black	Asian	Other
1.7	0.8	0.8



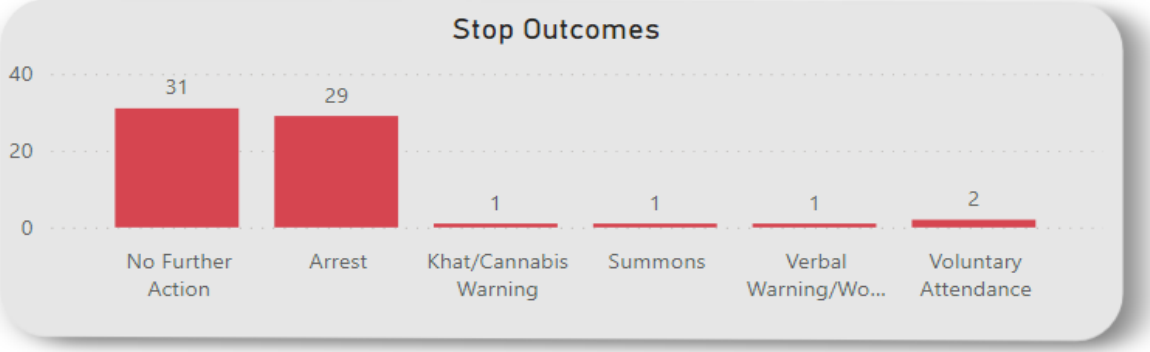


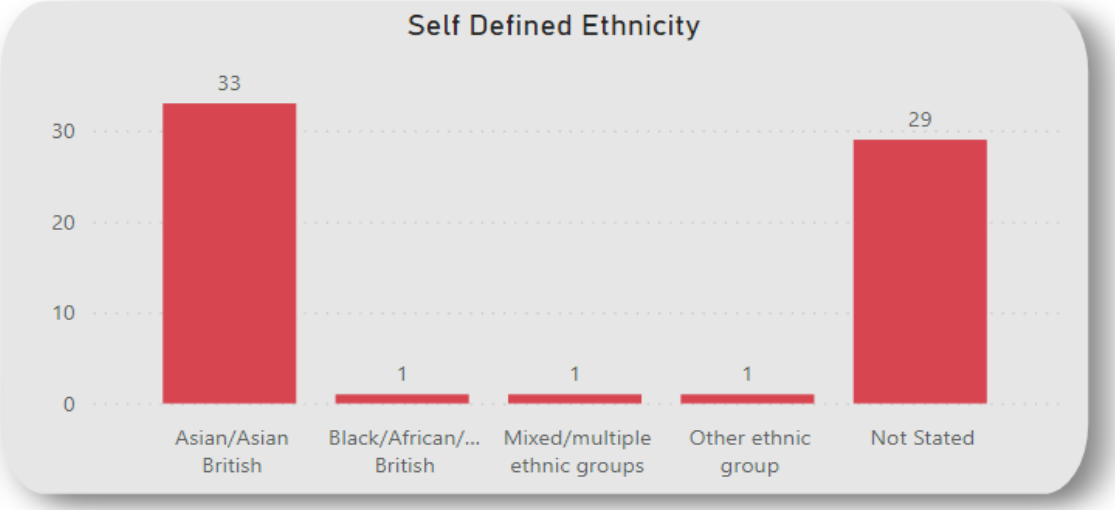
7. Breakdown by Ethnicity: Asian

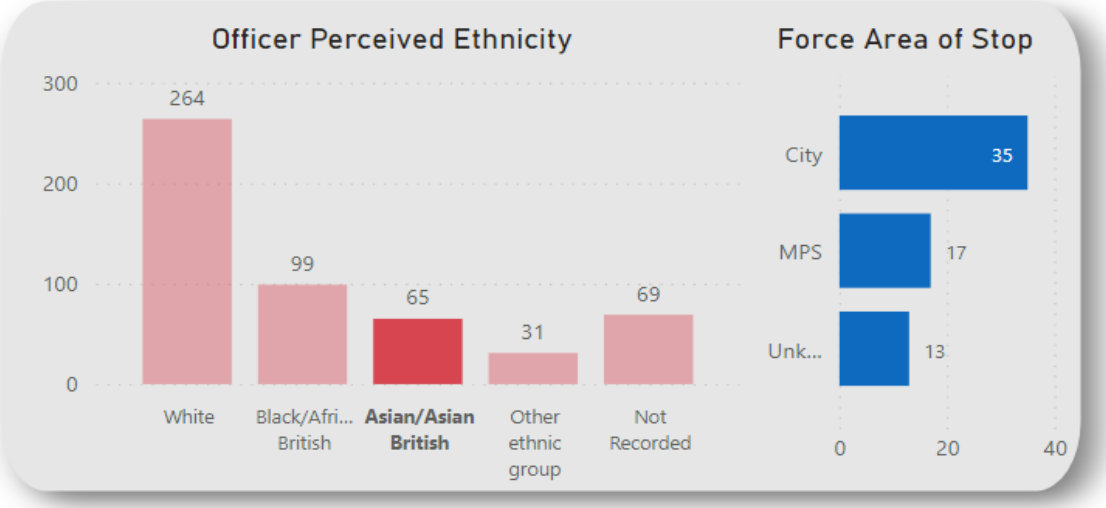
CITY OF LONDON POLICE

01/10/2022 31/12/2022

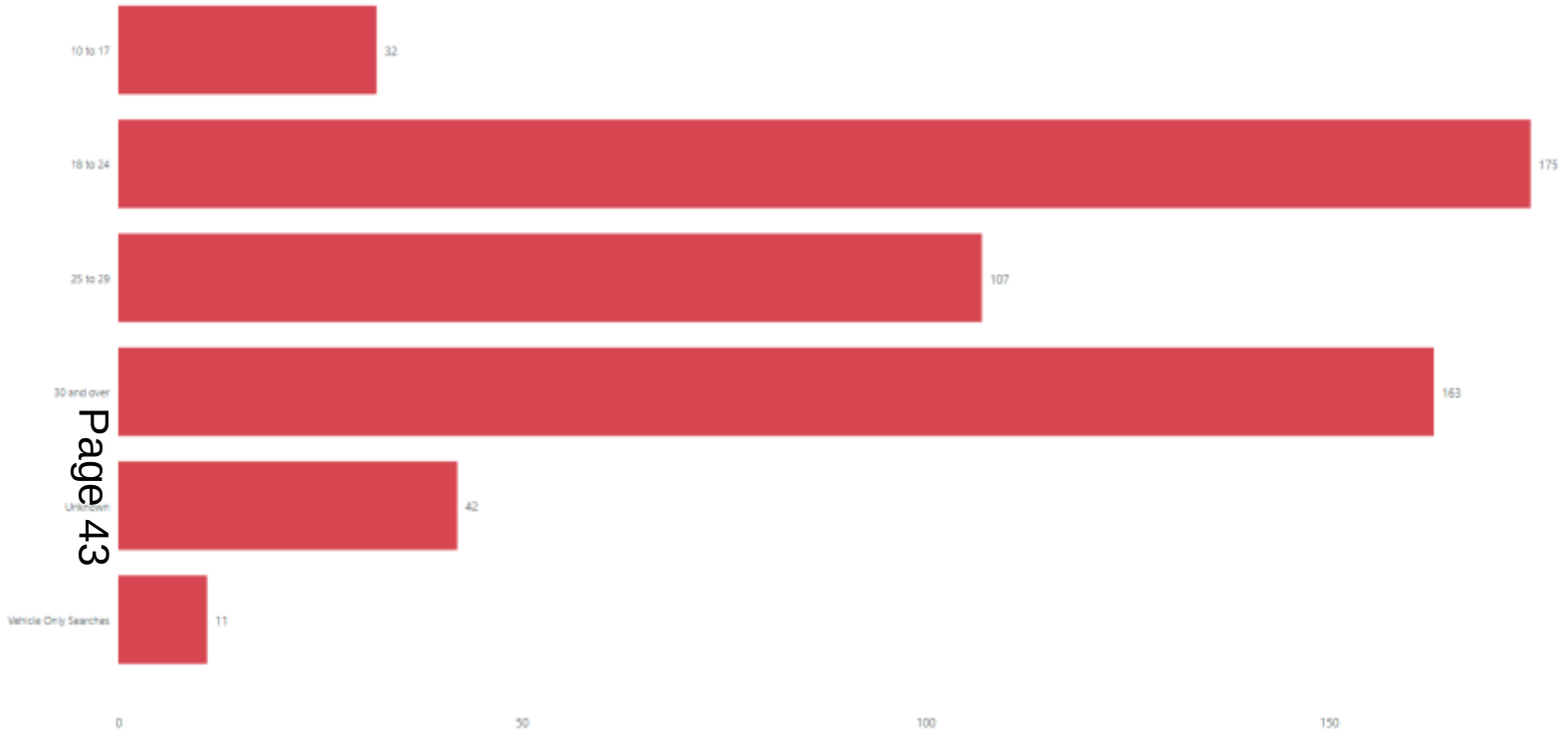
Black	Asian	Other
1.7	0.8	0.8

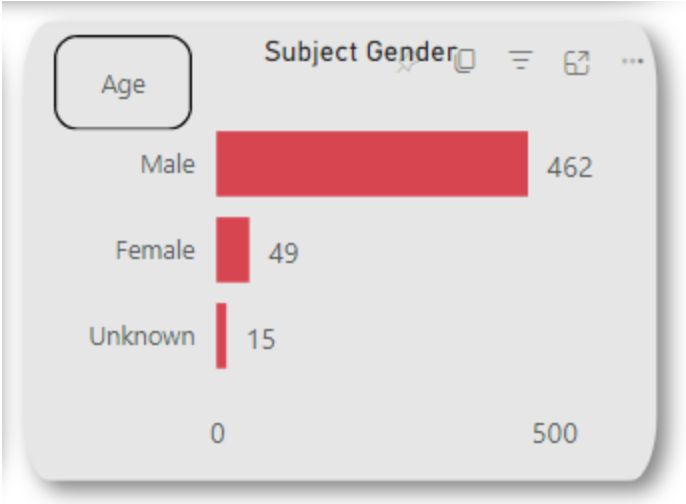






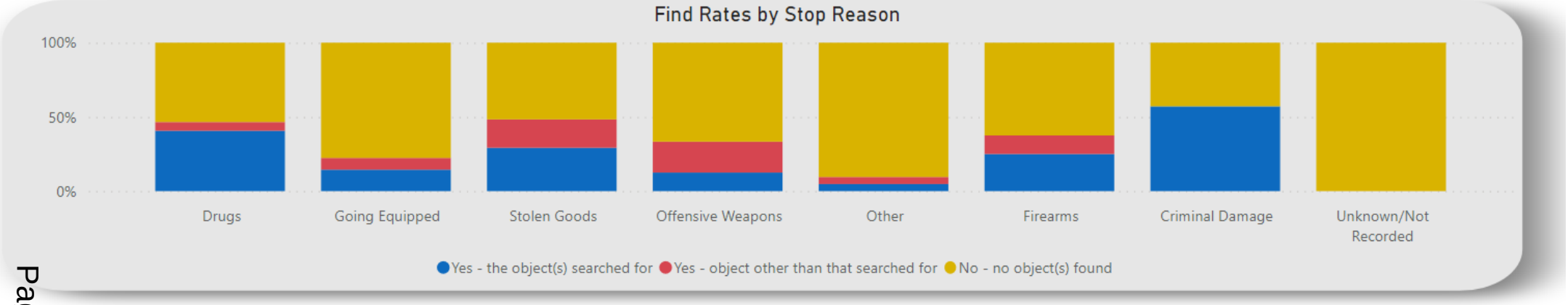
8. Age and Gender

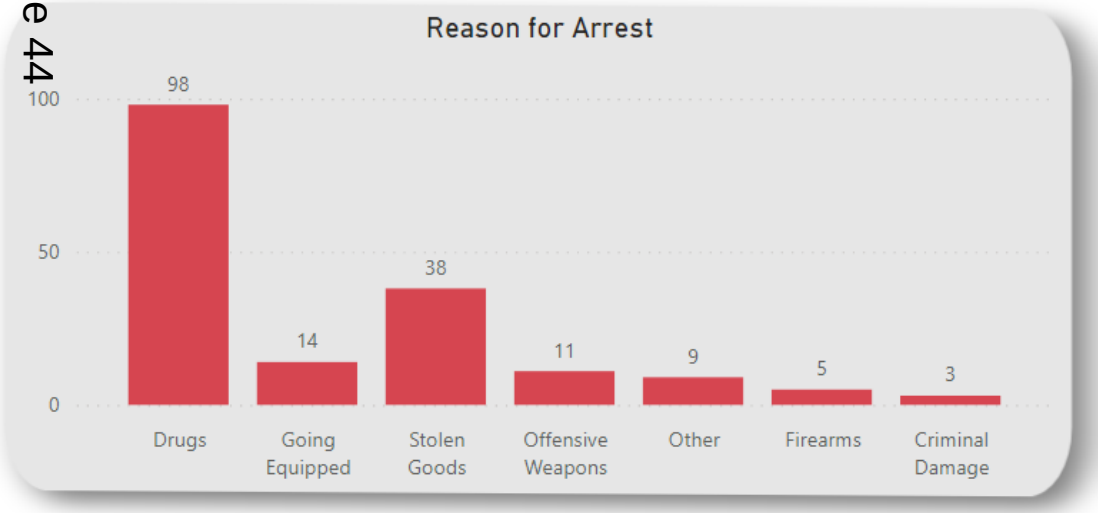


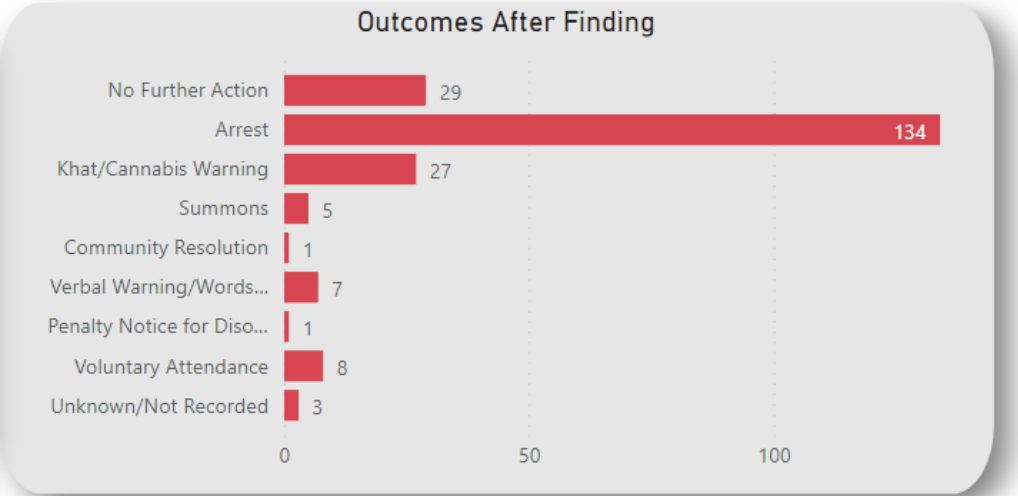


9. Outcomes: Find Rates

01/10/2022 31/12/2022

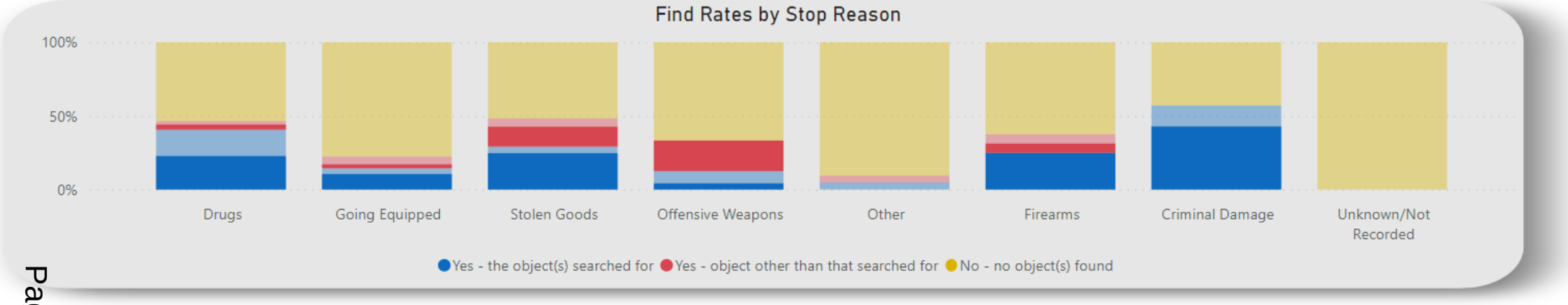


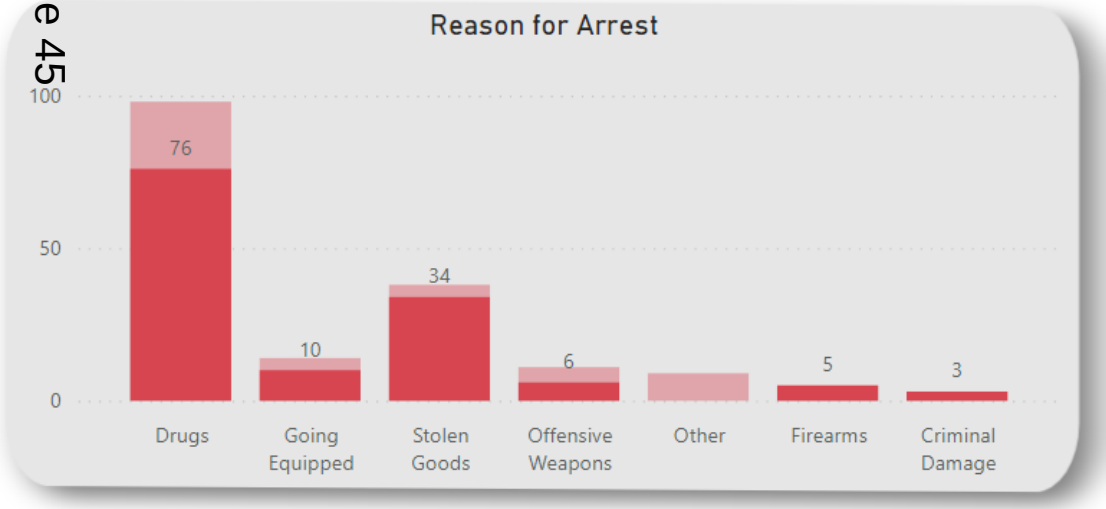


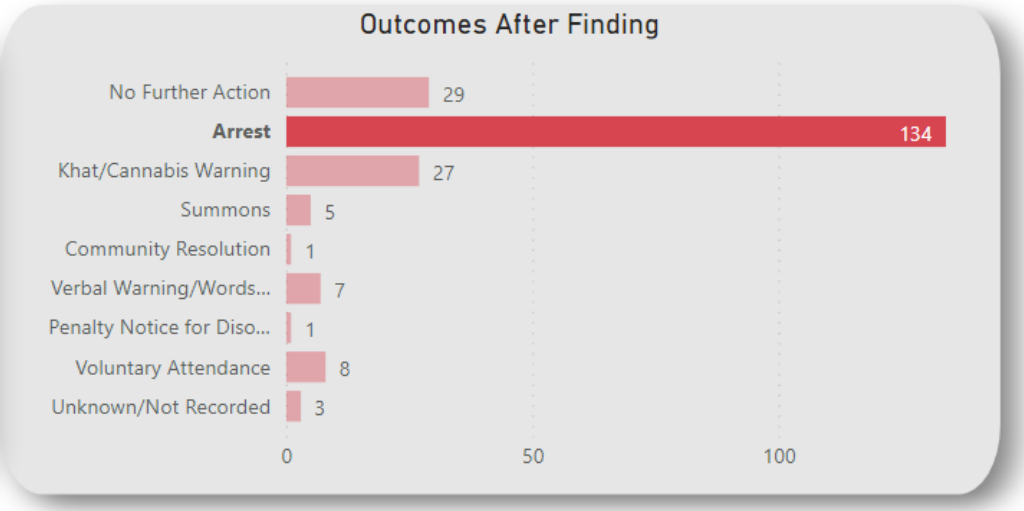


9. Outcomes: Arrests

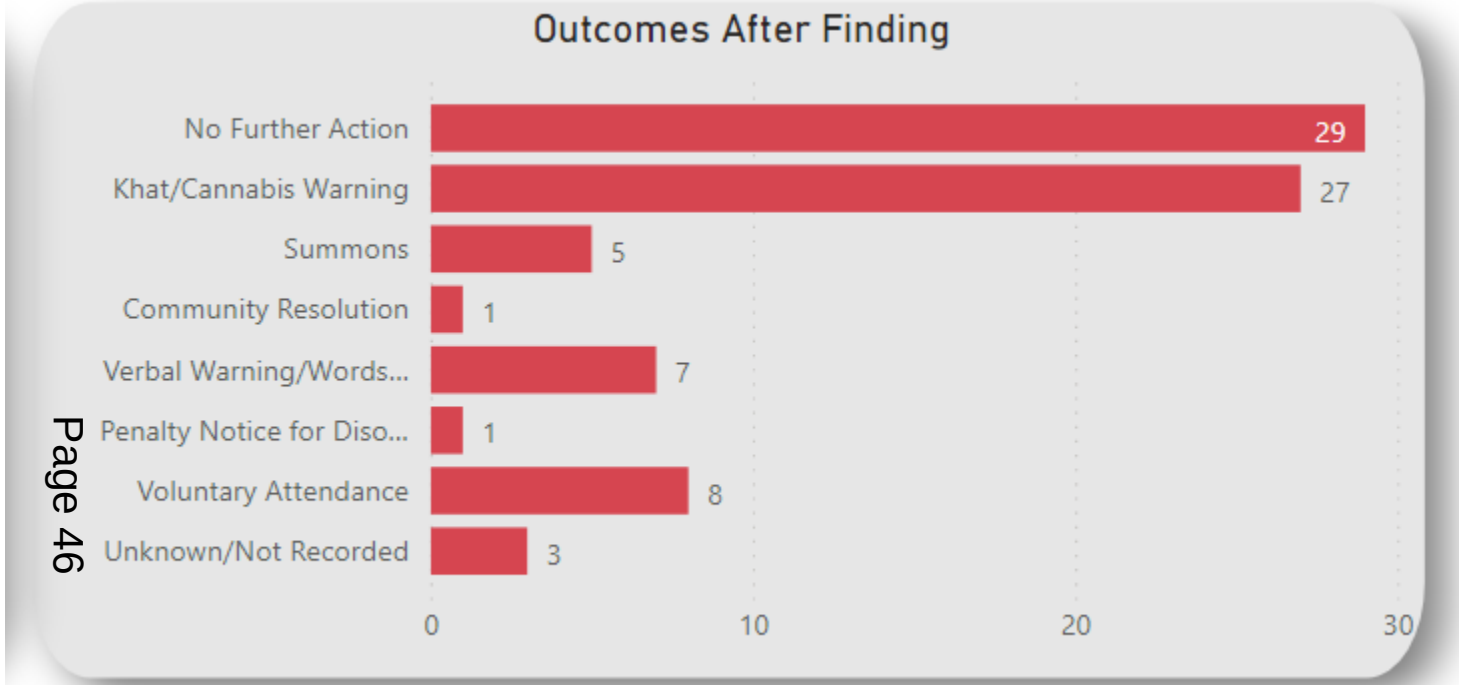
01/10/2022 31/12/2022







9. Outcomes: Other



10. Outcomes: Age, Gender and Ethnicity Breakdown

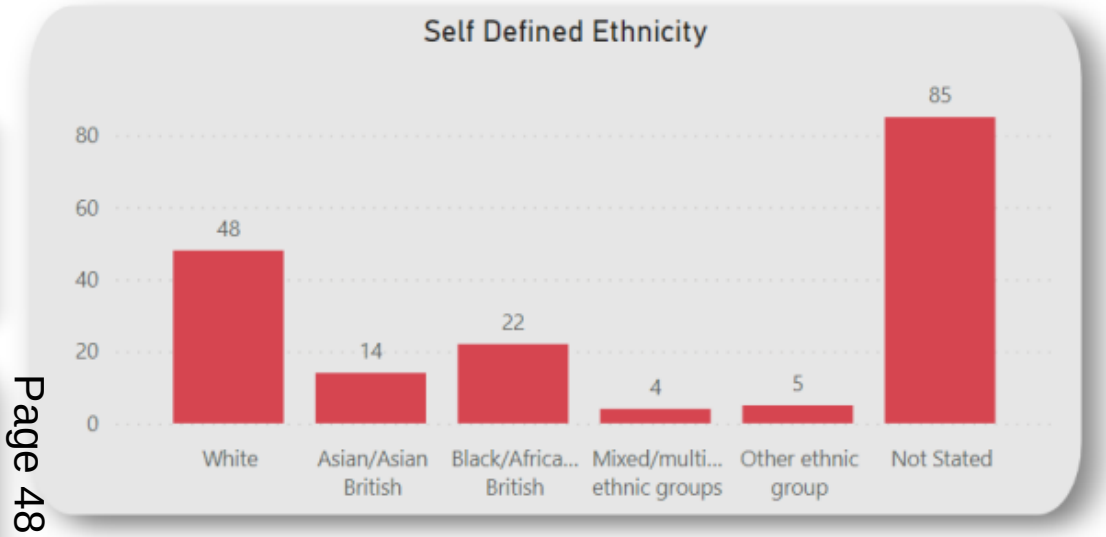
Ethnicity
The arrest rate is highest amongst white individuals (29.66%) then black (11.79%).
Drugs warnings were used more often with White individuals (33%) than Asian (2.7%) or black (18.).
No further action rates were highest for White individuals (33.68%), then black (10%) and Asian (6%)

Age
Arrest rates were then highest amongst 18 to 24 year olds this quarter at just over a third (35%, 63), for individuals between 10 and 17 years old the arrest rate was 5% (9 out of 178 stops).
For individuals age 30 and over the arrest rate was 34% (61 out of 178 stops).
No further action rates were similar across both high volume age groups (33.7%% for 18-24 years and 20% for 25-29 years and 6% for 10-17 years).
Drugs warnings were most commonly issued to those between 18-24.
Find rates were highest for 18-24 year olds (33.27%, 175 of 526 stops). The find rates for 10-17 year olds is 18% (4 out of 22 stops), the one stop where something was found and the subject not arrested resulted in a drugs warning.

Gender
The arrest rate for females is 9.32% and for males 87%, the NFA rate for females is 10% and for males 89%. No women had a stop resulting in a community resolution or voluntary attendance this quarter. The find rate for both genders is quite similar 42% for females and 41% for males, those females not arrested after finding were issued with a verbal warning / words of advice or drugs warning.

10. Outcomes: Ethnicity Breakdown

Arrests by Ethnicity



NFA by Ethnicity

Objects Found By Ethnicity

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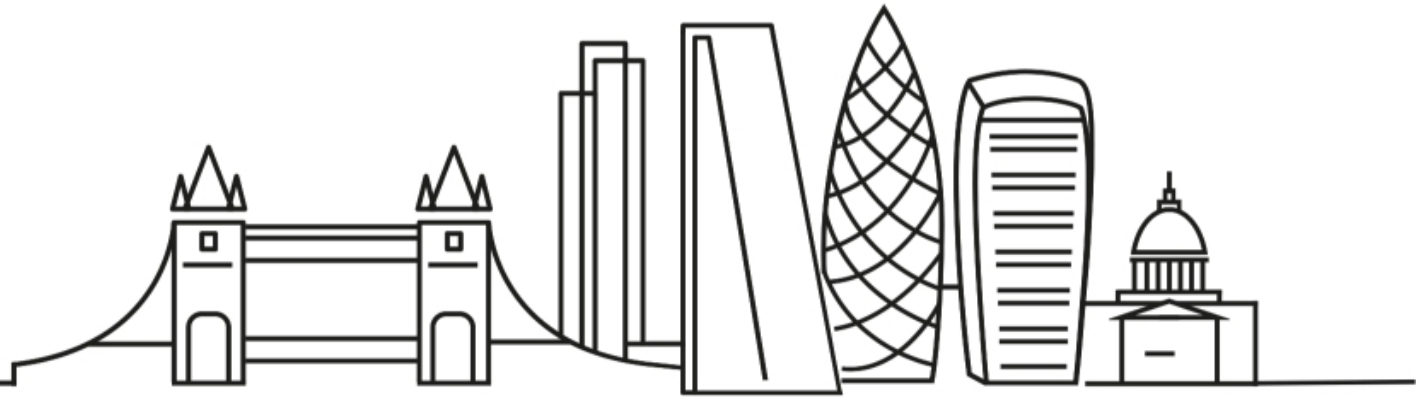


10. Outcomes: Age Breakdown
Subject Age 10 to 17

CITY OF LONDON POLICE

01/10/2022 31/12/2022

Stop and Searches Carried Out 32

Items Found 12

Arrests Made 9

Positive Outcome Rate 31%

Searches of Juveniles (10-17yrs) 31

Strip Searches 0

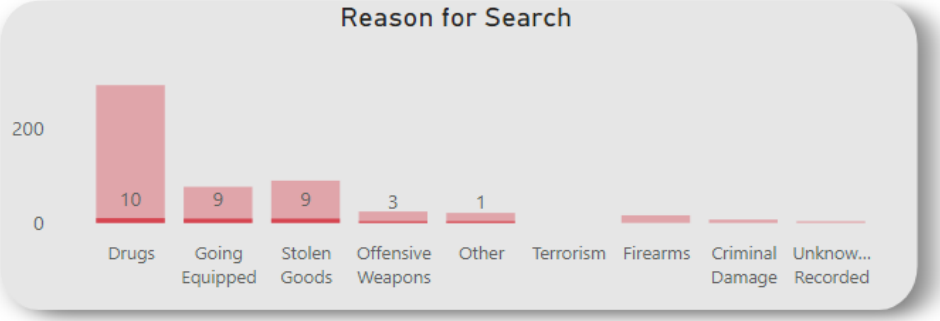
Clothing Removed

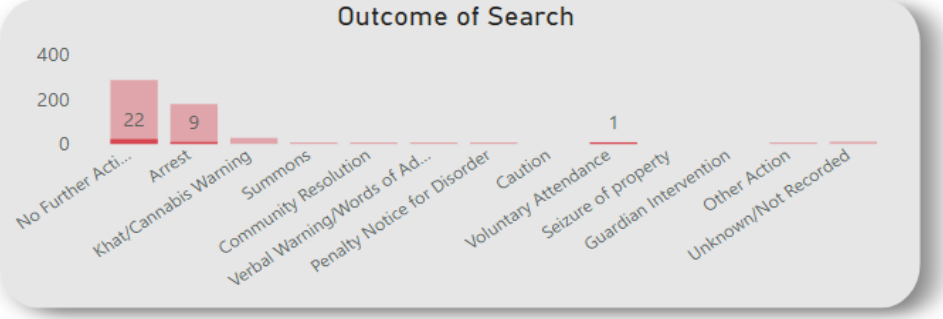
All

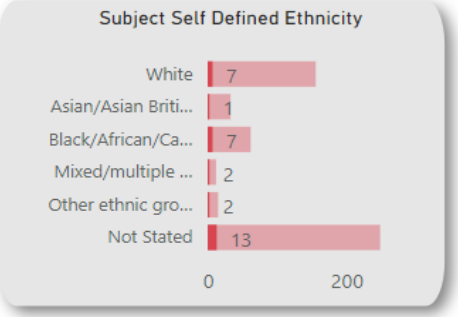
Section 60 Stops 0

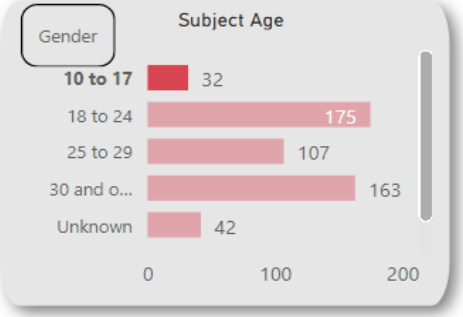
Khat Stops 0

Stops in Other Force Areas 2









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10. Outcomes: Age Breakdown
Subject Age: 18 to 24

01/10/2022 31/12/2022

Stop and Searches Carried Out
175

Items Found
73

Arrests Made
63

Positive Outcome Rate
47%

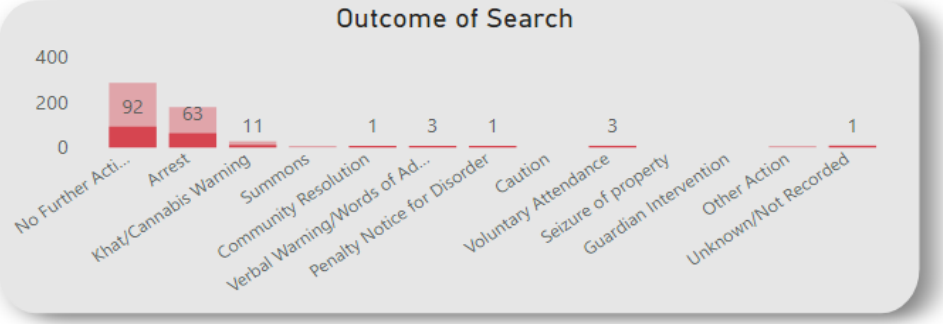
Searches of Juveniles (10-17yrs)
1

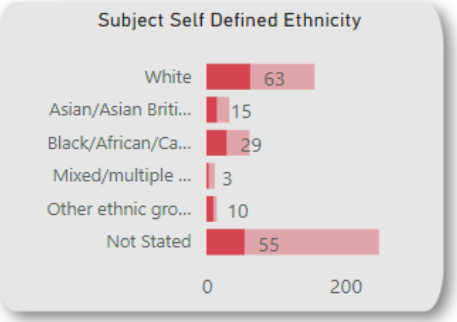
Strip Searches
9
Clothing Removed
All

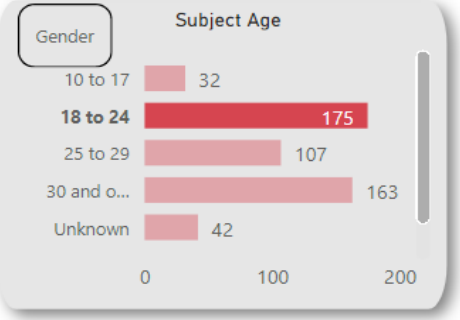
Section 60 Stops
0

Khat Stops
0

Stops in Other Force Areas
17







10. Outcomes: Age Breakdown
Subject Age: 25 to 29

CITY OF LONDON POLICE

01/10/2022 31/12/2022

Stop and Searches Carried Out
107

Items Found
50

Arrests Made
43

Positive Outcome Rate
50%

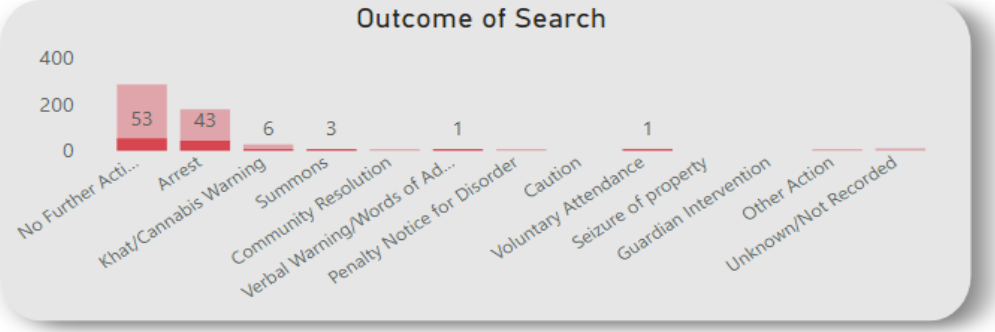
Searches of Juveniles (10-17yrs)
0

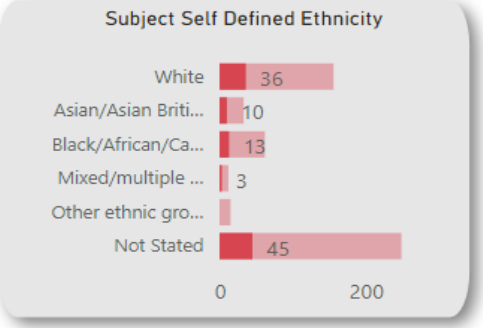
Strip Searches
6
Clothing Removed
All

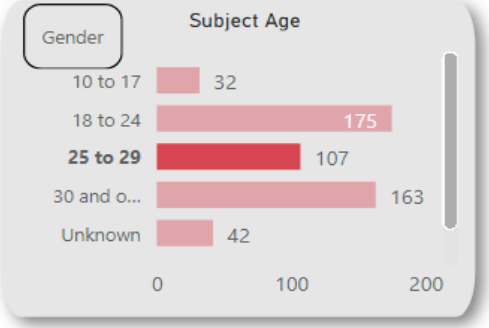
Section 60 Stops
0

Khat Stops
0

Stops in Other Force Areas
11







10. Outcomes: Age Breakdown
Subject Age: 30 and over

CITY OF LONDON POLICE

01/10/2022 31/12/2022

Stop and Searches Carried Out

163

Items Found

68

Arrests Made

61

Positive Outcome Rate

45%

Searches of Juveniles (10-17yrs)

0

Strip Searches

4

Clothing Removed

All

Section 60 Stops

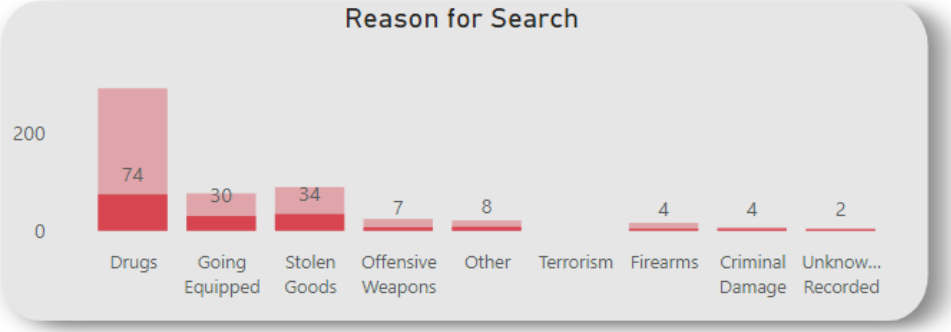
0

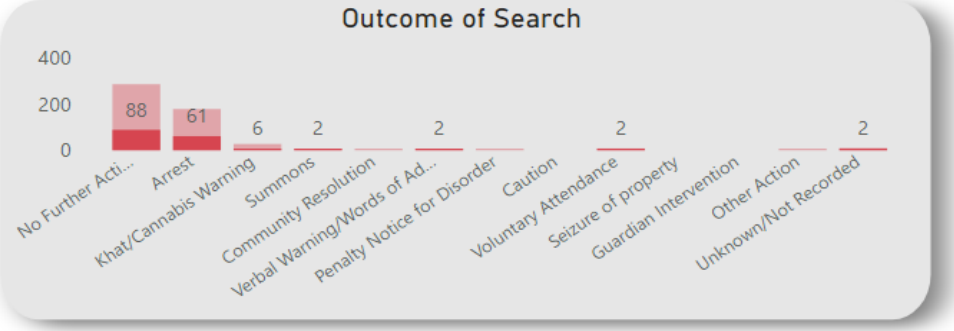
Khat Stops

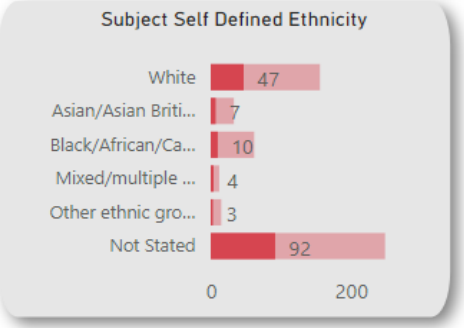
0

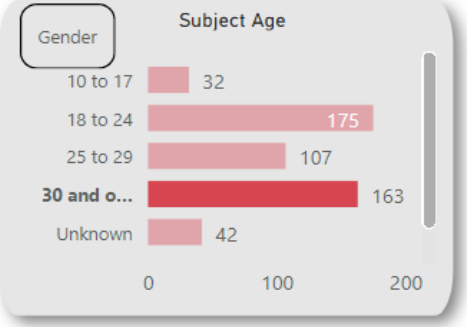
Stops in Other Force Areas

20









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10. Outcomes: Gender Breakdown
Gender: Male

01/10/2022 31/12/2022

Stop and Searches Carried Out
462

Items Found
191

Arrests Made
164

Positive Outcome Rate
45%

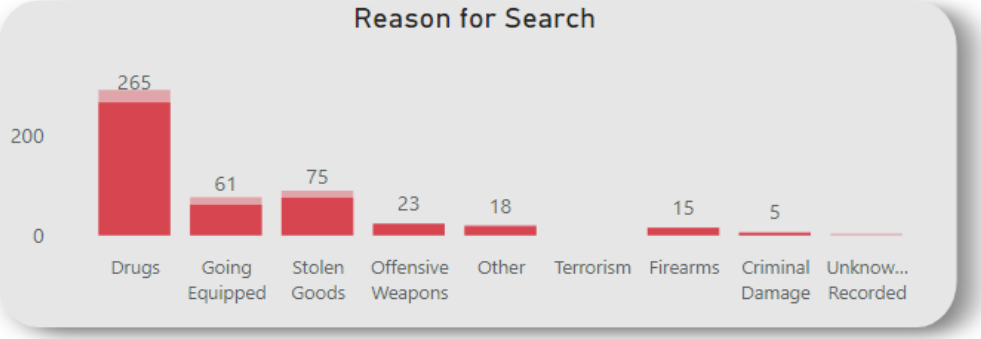
Searches of Juveniles (10-17yrs)
30

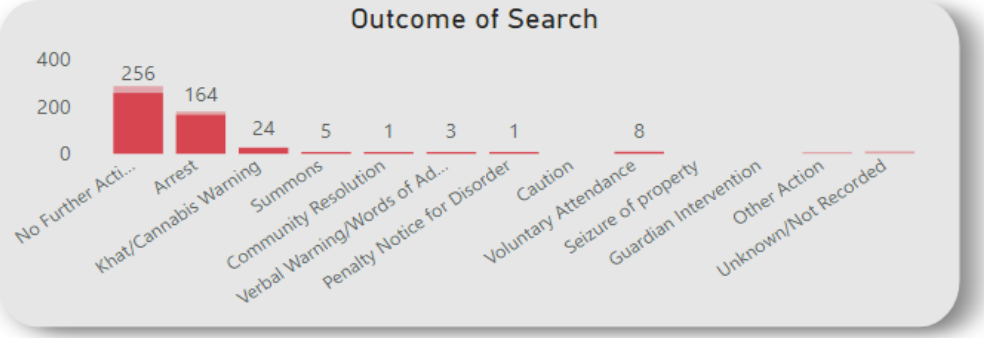
Strip Searches
19
Clothing Removed
All

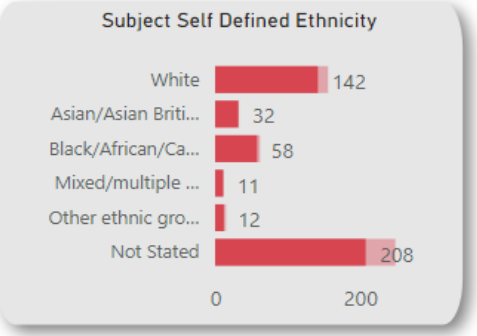
Section 60 Stops
0

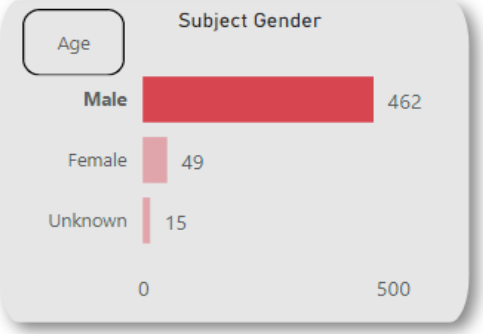
Khat Stops
0

Stops in Other Force Areas
52









10. Outcomes: Gender Breakdown
Gender: Female

CITY OF LONDON POLICE

01/10/2022 31/12/2022

Stop and Searches Carried Out
49

Items Found
21

Arrests Made
14

Positive Outcome Rate
43%

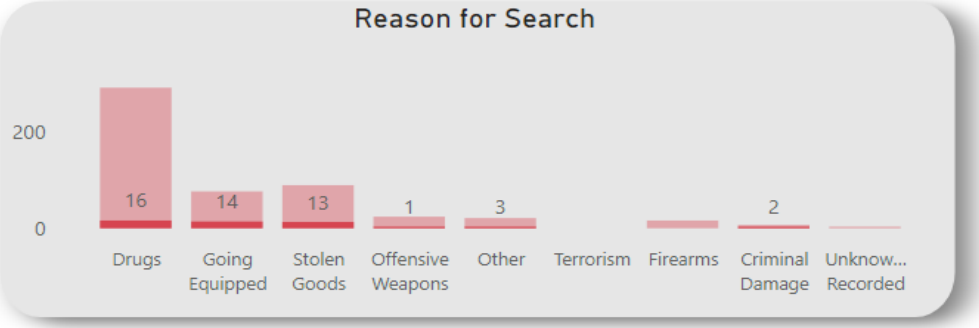
Searches of Juveniles (10-17yrs)
2

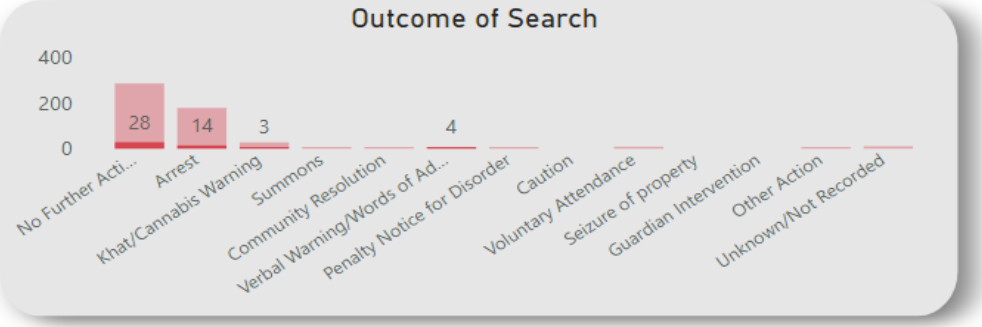
Strip Searches
0
Clothing Removed
All

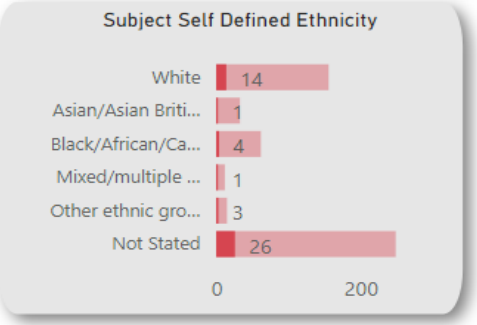
Section 60 Stops
0

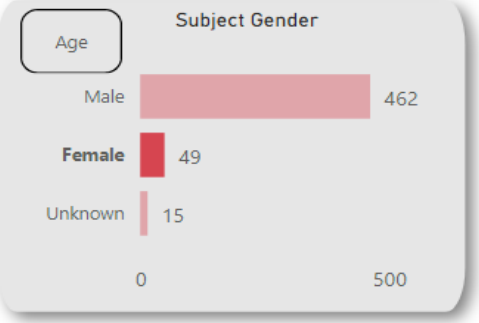
Khat Stops
0

Stops in Other Force Areas
5









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10. Outcomes: Gender Breakdown
Gender: Unknown

CITY OF LONDON POLICE

01/10/2022 31/12/2022

Stop and Searches Carried Out

15

Items Found

3

Arrests Made

0

Positive Outcome Rate

27%

Searches of Juveniles (10-17yrs)

0

Strip Searches

0

Clothing Removed

All

Section 60 Stops

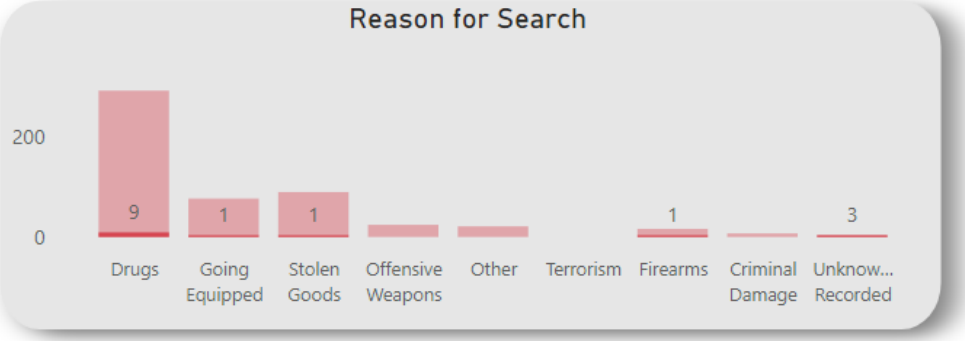
0

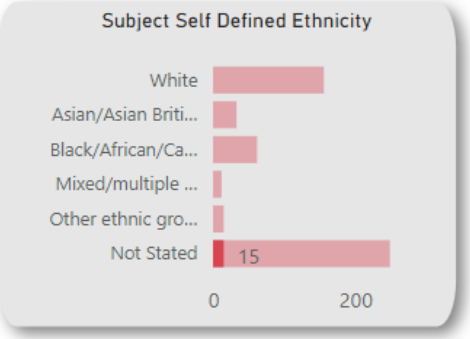
Khat Stops

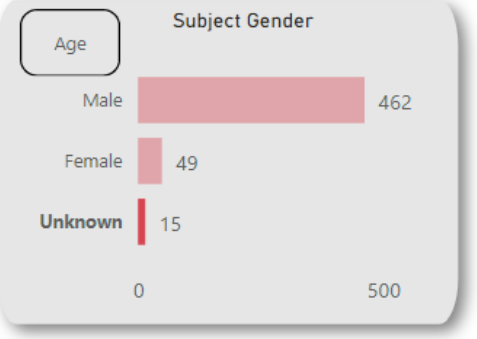
0

Stops in Other Force Areas

2







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Committee(s): Professional Standards and Integrity Committee Police Authority Board	**Dated:** 8 February 2023 15 February 2023
Subject: Quarterly Equality and Inclusion Update	**Public**
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1 and 3
Does this proposal require extra revenue and/or capital spending?	**N/A**
If so, how much?	**N/A**
What is the source of Funding?	**N/A**
Has this Funding Source been agreed with the Chamberlain's Department?	**N/A**
Report of: Commissioner of Police Pol 32-23	**For Information**
Report author: Kam Dhaliwal, Equality & Inclusion Manager, T/Chief Superintendent Sanjay Andersen, Head of Professionalism and Trust	

Summary

This report provides an update regarding E&I activity within the Force from a national and local perspective since the last report to your Committee in November 2022. Appendix A provides a number of slides to outline our delivery of the E&I Strategy through a consolidated E&I Delivery Plan.

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

Recommendation(s)

It is recommended that Members note the report.

Main Report

Background

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

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

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

Current Position

b. **National updates:**

Nationally, Chief Constable Gavin Stephens has taken over the National Police Race Action Plan, from Deputy Chief Constable Tyron Joycen, who implemented the National Police Race Action Plan. The plan's key objectives are to improve policing through more effective public protection, increasing trust and confidence, and a legitimate focus on those who seek to prey on the vulnerable.

The National Police Race Action Plan (PRAP) was released as a first version in May 2022. Since the implementation of the PRAP, the national lead asked all forces to complete a short survey, to understand how the plan has progressed locally, which the force has completed. This survey results will be used to help inform any changes and reviews to the PRAP.

Since the introduction of the PRAP, the forces Professionalism & Trust Team, have reviewed a number of recommendations that have originated from Government, Policing and internal reviews, on how to improve race equality in policing. All the recommendations have been captured and evaluated to remove duplication. The recommendations have been amalgamated with the National Police Race Plan, to create a personalised Force Race Action Plan. The Forces Race Action Plan activities and themes have been cross compared with the Forces overarching Equality, Diversity & Inclusion (EDI) Action Plan, to remove any duplication, ensure collaboration between action owners, and to help create the EDI Strand Lead working groups. This process will allow the force to become more efficient and effective when dealing with any EDI activities.

Members will note that a separate detailed report for Violence against women and girls is included in the committee pack for review.

c. **Local updates:**

Independent Advisory Scrutiny Group Support

The force has an independent community group, called the Independent Advisory Scrutiny Group (IASG), which is made up of independent community members who have no link to the force. The IASG members volunteer their own time and act as a critical friend on policing processes such as Stop & Search, Use of Force, critical incidents etc. The IASG portfolio has now moved over to the Professionalism & Trust Team, which is being headed by T/Chief Superintendent Sanjay Andersen. This involves being the liaison point between the IASG and the force, the recruitment of new members, administrative support and providing the members with training on policing processes, to enable them to make informed decisions.

Review of E&I process:

There are a number of reviews taking place, with regard to the Equality, Diversity and Inclusion (EDI) activities, taking place in force. The reviews are coming along at a steady pace and once complete, the paper will be brought to the next E&I Strategic Board for signoff.

Public Sector Equality Duty Report:

The Public Sector Equality Duty Report is due to be published on the 30th March 2023, and it will contain Gender Pay Gap information, and all the forces workforce data with regard to the Equality Acts 9 protected characteristics. HR and the E&I Manager are currently working on the report and also plan to review the equality objectives, which are:

Objective 1: Increase the number of black and minority ethnic and female officers to be reflective of the London population.

Objective 2: Increase the number of officers and staff self-declaring their protective characteristics.

Work Experience:

The force re-introduced work experience into the force, back in 2018 due to the benefits it provided on community engagement, promoting positive policing, recruitment and youth engagement. Due to limited resources, the request for work experience from external students has been suspended. Once the situation improves, the board will be updated.

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

1. Recruitment and onboarding

In December 2022, the Force ran a Superintendents recruitment process for Police Officers, with the results being released in January 2023. Five applicants were successful, of which four are female, which is one of the Forces Public Sector Equality Duty objectives, to increase female representation.

There has been no significant update since the Forces last Equality and Inclusion (E&I) Strategic Board. The Human Resources (HR) and Learning & Organisational Development (L&OD) will continue to progress:

- A detailed analysis of workforce data and produce aspirational targets.
- Complete a cradle to grave review of all recruitment processes.
- Review our vetting approach with regards to those with protected characteristics, with a priority focus on minority ethnic groups.
- Set up feedback processes for unsuccessful candidates and promote development plans for future potential candidates.
- Ensure transparency with all recruitment, progression and exit from service data in respect to all protected characteristics.
- Ensure diversity visibility throughout recruitment process.
- Police leaders should, through their continuing professional development, seek out opportunities to understand issues that affect underrepresented groups and address them through strategy and action planning.
- Police leaders should consider the use of ‘reverse mentoring’ to be more engaged with their workforce.
- Equip selection panels with unconscious bias training for all those involved in the recruitment process.
- Invest in training and development of Police leaders.
- The Force to develop a talent management program for upward and lateral development.
- The Force to ensure mentoring/coaching and support mechanisms are in place to support officers with protected characteristics.
- Staff with Protected Characteristic should, at the commencement of their service, be sign posted to support groups to seek early guidance should it be required.
- Review the Police Constable Degree Apprenticeship (PCDA) programme to ensure it aligns with E&I plans and principles.

Please see: Appendix B which accompanies the update.

2. Health & Wellbeing

There has been a significant amount of activity since the Forces last update in October. The key agenda is around the mental health of the staff, developing their activity collectively within the force to reduce it, and assist providing tools and assistance to the staff. The His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) have highlighted the importance of wellbeing within recent Police Effectiveness, Efficiency, and Legitimacy (PEEL) inspections reports.

- Completion of Better listening campaign training in collaboration with the Samaritans charity.
- Embedding of Mental Health (MH) first aiders (20 officers) and PSIP training (12 officers).

- Continuation of Collaboration with Police Mutual with the cost of living crises with helpful tips and links to financial planning and support.
- Occupational Health (OH) refresh , communication package created for a quarterly force wide update to highlight the good work within OH and signpost officers and staff to the services that OH offer.
- Refresh of the Wellbeing strategic document 2023 version
- Completion of the PEEL HMICFRS inspection good feedback received from the focus groups and reality testing feedback within the PEEL process

Key Next Steps

- Await PEEL HMICFRS force report and associated actions and improvements from this document.
- Continuation of force wellbeing coffee mornings looking to grow this further and include partners and 3rd sector agencies.
- Review Mental Health courses for supervisors which were launched by L&OD in October

3. Community Engagement

- Amazon Schools Project successfully ran in September bringing together 50 16–24-year-olds with the aim to improve trust and confidence between police & young people. Further workshops & expansion in planned (2nd Feb next meeting).
- The Volunteer Cadet Unit (VPC) continues to impact across the City Police Area. The Unit is now 35 strong, with applications consistently being received. There remains good gender parity and diverse representation (15 male and 20 females; 17 cadets have self-identified as from a diverse background). In addition, the City of London Prep school (a joint venture between CLSG and CLS Boys) have expressed willing to host a Junior Cadet Unit in the future.
- The Youth Independent Advisory Group (IAG) is progressing, and a Standard Operating Policy (SOP) has been drafted with benchmarking taking place. Partnership and Prevention Hub (P&P) are now actively recruiting young people to join.
- Cluster panels continue across the City quarterly with a number of local promises / priorities being set. For residential areas the Force will look to make these meetings monthly going forward.
- Operation Reframe continues to be held monthly, each with a different policing theme. Plans to scope new locations throughout the City based on crime/ASB data, and perceptions of crime/risk.
- Funding has been agreed to launch Schools Programme with Life Skills this academic year in all City Schools. Neighbourhood officers will be trained to deliver the training package in Schools, affording valuable time for youth engagement and early intervention.
- Partnership & prevention (P&P) hub being fully staffed to concentrate on key thematic areas such as mental health, using uplift Dedicated Warden Officers (DWOs) are being increased to 18 from 12.
- Independent Advisory Scrutiny Group (IASG) scrutiny of stop search forms and BWV continues to develop.

Key next steps:

- Launch Walk & Talk and Ride Along initiatives to better engage with local communities and afford an opportunity for scrutiny.
- Support the formation of Business Improvement Districts Sounding Boards (akin to a business Independent Advisory Group (IAG)) to sense check operations/initiatives in Force.
- Continue to increase Nextdoor membership through residential flyer (sending Feb).
- Following Neighbourhood Policing Peer Review (Surrey Police) there is an opportunity to utilise partner data sets quickly via 'Acorn' to map communities better – P&P Hub to research.
- Prioritise P&P Hub restructure and identify SMEs for Community Thematic areas including suicide prevention, mental health, homelessness and hate crime.
- Promote opportunities in the Special Constabulary and other voluntary roles internally and externally with our communities.
- Increase cluster panel attendance through a comprehensive media strategy.
- Continue outreach to ensure our recruitment pool remains diverse for 23/24 intakes, plus focus on expanding recruitment for Special Constabulary

4. Leadership & Culture

- The Force launched its internal series of *Our People – Inclusivity Programme* events. The two-hour sessions, hosted at the Aviva building, provided a gateway to the force's wider programme of activities (to commence in 2023). The vast majority of police officers and police staff experienced one of the events, albeit a series of national rail strikes impacted on attendance. Each event included an interactive section, with feedback currently being used to shape the menu of options for future activities.
- The force's data bias working group concluded its year-long review of this subject area. Proposals will be brought to the March Equality & Inclusion (E&I) Strategic Board for consideration and approval.
- The results of the Force annual workforce survey have been shared with staff, with unit heads / team leaders being given the task of creating relevant action plans.

Next Steps

- Cross-check participation in initial gateway events and provide alternative access where appropriate.
- Finalise and publish the plan for *Our People – Inclusivity Programme* activities in 2023.
- Formalise data bias work within the existing force governance structure - including the integration of the National Police Chiefs Council (NPCC's) *Data Literacy Framework*.
- Review annual staff survey results (leadership & culture related responses) - and ensure that areas for improvement are reflected in unit / team action plans.
- Finalise the plan for Force's annual E&I award.

5. Retention and Exiting the organisation

In January, the Strand Lead organised a workshop for all employees to discuss the revised draft mapping process, using the four key areas. The feedback for each key area is:

Work Strand 1 – The identification and recording of data use

- Increase completion rates – All messaging about the changes to the organisation should come from the Chief Officer Team (COT) to help encourage employees to engage. Publishing the data and evidence will also encourage more people to complete the exit interview.
- Knowledge sharing – Due to the relative low number of people leaving the organisation, improved data disaggregation per team/department/unit over different time periods would enable managers to see trends and help capture any learning, trends and behaviours .
- Exit interview question themes – If the responses were broken down by themes, it would help the force understand the cultural/societal behaviours that cause employees to leave.

Work Strand 2 – A review and agreement of the Exit Interview process

- Collaborative working between specialist advisors – Collaborative working between specialist advisors would address any gaps in knowledge and timescales and ensure the best outcome for the employee and the organisation.
- Introduction of a Stay Interview/Retention Conversations – The force currently has an exit interview process for when the employee has already decided to leave. With the introduction of a Stay Interview, it allows the line managers to address any issues the employee has, before acting on their desire to leave.
- Advertisement of inclusive developmental/mentoring opportunities – If the conversations are held at a local management level, it could encourage people to have the conversation about their career and aspirations with line managers.

Work Strand 3 – Exit interview questions.

- Personal Development Report (PDR) – It would be helpful to give all line managers a PDR objective that requires them to complete all people management process.
- Training to be provided on the difference between police staff and police officers terms and conditions of employment – Training should be provided to all line managers on the differences.

Work strand 4 – Retention conversations.

- Template on how to conduct the exit and stay interview – The creation of a toolkit that guides managers on how to conduct the exit interview, with helpful tips on what language to use and what support is available.
- Mandatory Management Development Programme (MDP) – Line managers should be mandated to attend the forces MDP.
- Re-entry scheme for Police Staff – The force has a re-entry scheme for police officers and not police staff. Police Staff should also be given the opportunity to re-enter.

Key Next Steps

- The new EDI Strand working group, which is made up of key specialist advisors and departments, will collaborate to implement and embed the recommended changes.

- The working group will continue to consult with key stakeholders, staff support representatives and force employees.

e. **Diversity Workforce Data**

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

Please refer to Appendix B for full details.

f. **Performance Measures**

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

Please refer to Appendix C for full details.

Conclusion

The Force Continues to progress the workstrands under Equality and Inclusion as a priority.

Appendices

- Appendix A – Highlight summary of progress made against the E&I Action Plan
- Appendix B – EDI Report Workforce Equality Data December 2022
- Appendix C - KPI Measures Table.

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Workstream	Recruitment, Onboarding and L&OD	Owner	Director of HR	Date	23/01/23	Project RAG		Benefit RAG	

Workstream objectives	Priority	
	Description	Date
In December 2022, the Force ran a Superintendents recruitment process for Police Officers, with the results being released in January 2023. Five applicants were successful, of which four are female, which is one of the Forces Public Sector Equality Duty objectives, to increase female representation. There has been no significant updates since the last E&I Board. The Human Resources (HR) and Learning & Organisational Development (L&OD) will continue to progress: • CoLP to undertake detailed analysis of workforce data and produce aspirational targets • Complete a cradle to grave review of all recruitment processes • Review our vetting approach with regards to those with protected characteristics with a priority focus on minority ethnic groups Set up feedback processes for unsuccessful candidates and promote development plans for future potential candidates Ensure transparency with all recruitment, progression and exit from service data in respect to all protected characteristics Ensure diversity visibility throughout recruitment process • Police leaders should through their continuing professional development seek out opportunities to understand issues that affect underrepresented groups and address them through strategy and action planning • Police leaders should consider the use of 'reverse mentoring' to be more engaged with their workforce • Equip selection panels with unconscious bias training for all those involved in the recruitment process • Invest in training and development of Police leaders • CoLP to develop a talent management program for upward and lateral development • CoLP to ensure mentoring/coaching and support mechanisms are in place to support officers with protected characteristics • Staff with Protected Characteristic should at the commencement of their service be sign posted to support groups to seek early guidance should it be required • Review the PCDA programme to ensure it aligns with E&I plans and principles	Aspirational targets have been agreed by E&I board	Complete
	Review our recruitment and attraction structure and people	Complete
	Review promotion processes end to end	Ongoing
	Cultural Workshop- Agreement next steps / outcomes	19 Jan 22
	Reverse Mentoring - phase 2 continues	Ongoing
	Community Engagement plan for PEQF	March 2022
	PALs cohort 2 launched, 3rd module delivered with 4th scheduled for 2 November	Ongoing
	Pilot of Mentivity Training #2	Feb 2022
	Delivery of forcewide awareness programme on Values, Ethics, Equity, Belonging – 'Our People, Our Values'	June 2022

Workstream	Health and Wellbeing	Owner	Inspection and improvement	Date	24/01/23	Project RAG		Benefit RAG	

Workstream objectives

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

Priority Deliverables

Description	Date
Launch a Buddy Scheme for all new joiners (completed) on going all new students receive the buddy scheme including Police Now candidates.	ongoing
Review strategy on Health and Wellbeing (completed and published)	02/22 completed and refreshed yearly
Oskar Kilo recommendations and planning	12/22
60 MH first aiders to be trained and launched	12/22
Launch Wellness Zone in Bishopsgate (COMPLETE)	11/21
MH at work commitment MIND CHARITY and ongoing	06/22

Progress since last update

••Completion of Better listening campaign training in collaboration with the Samaritans charity
•Embedding of MH health first aiders (20 officers) and PSIP training (12 officers)
•Continuation of Collaboration with Police Mutual with the cost of living crises with helpful tips and links to financial planning and support
•OH refresh , communication package created for a quarterly force wide update to highlight the good work within OH and sign post officers and staff to the services that OH offer
•Refresh of the Wellbeing strategic document 2023 version
•Completion of the PEEL HMICFRS inspection good feedback received from the focus groups and reality testing feed back within the PEEL process

Key next steps

- Await PEEL HMICFRS force report and associated actions and improvements from this document.
- Continuation of force wellbeing coffee mornings looking to grow this further and include partners and 3rd sector agencies.
- Review MH courses for supervisors which were launched by L&OD in October
-

NOT PROTECTIVELY MARKED

Workstream	Community Engagement	Owner	Ch Supt Local Policing	Date	23/01/23	Project RAG		Benefit RAG	

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

Description	Date
Commence recruitment outreach plan	Completed
Map city communities / key individuals, calendar of engagement events	Completed
Launch inaugural 12 week schools project across the city	Completed
Set proposed key performance indicators for activity	Completed
Launch community based cluster panels	Completed
Pilot LGBT+ advisor network	Completed
Involve community in scrutiny of S/S, UoF wider police training	Ongoing

Progress since last update

- Amazon Schools Project successfully run in September bringing together 50 16-24 year olds with the aim to improve trust and confidence between police & young people. Further workshops & expansion in planned (2nd Feb next meeting).
- VR continues to impact across the City Police Area. The Unit is now 35 strong, with applications consistently being received. There remains good gender parity and diverse representation (15 male and 20 females; 17 cadets have self-identified as from a B.A.M.E background). In addition, the City of London Prep school (a joint venture between CLSG and CLS Boys) have expressed willing to host a Junior Cadet Unit in the future.
- Youth IAG is progressing, SOP has been drafted + benchmarking taking place. P&P hub are now actively recruiting young people to join.
- The Strategic Research & Analysis Unit have produced a CoLP Community Profile –pulling together data from various sources to provide a picture of the various groups within the City of London and map its diverse communities. This profile will be continually updated with the Census results later this year. This along with our calendar of events and meetings will be published on the internet. Update: Updated profile requested via Strategic Research & Analysis Unit (incorporating latest Census data) – once complete, will be shared with all LP officers for awareness.
- Cluster panels continue across the City quarterly with a number of local promises / priorities being set. For residential areas we will look to make these meetings monthly going forward. A number of task and finish groups have been set up to target ASB in for example the Barbican, Golden Lane Estate responding directly to community concerns. Work is progressing re updating the CoLP website with enhanced information re neighbourhood policing activity.
- The Forces response to the NTE is currently being reviewed by Local Policing with plans to maximise visibility, provide reassurance and increase partnership working through activities such as Op Reframe (Welfare Hubs in Hot Spot locations). Update: Op Reframe continues to be held monthly, each with a different policing theme. Plans to scope new locations throughout the City based on crime/ASB data, and perceptions of crime/risk.
- PnP Hub looking to implement a Schools programme via an external provider to educate young people on current issues, provide visible reassurance in City schools and improve relations with the Young Community. Procurement has commenced and benchmarking has begun with when is best to launch and have the most impact. Update: Funding agreed via TTCG to launch Schools Programme with Life Skills this academic year in all City Schools. Neighbourhood officers will be trained to deliver the training package in Schools, affording valuable time for youth engagement and early intervention.
- Partnership & prevention hub being fully staffed to concentrate on key thematic areas such as mental health, using uplift DWO officers are being increased to 18 from 12.
- During probationary period our new officers complete; business engagement session; working with cadets; school engagement, attendance at cluster meetings. Projects and work will be linked to these activities following evidenced based policing criteria. Our People Inclusivity Strategy includes a PDR objective linked community module. An opportunity for staff to identify an initiative linked to diversity, inclusion, values in their own local community. Colleagues will then engage in person for half a day in that project & complete reflective practice in the form of a blog, journal or PDR entry
- IASG scrutiny of stop search forms and BWV continues to develop

Key next steps

- Launch Walk & Talk and Ride Along initiatives to better engage with our communities and afford an opportunity for scrutiny.
- Support the formation of Business Improvement Districts Sounding Boards (akin to a business IAG) to sense check operations/initiatives in Force.
- Continue to increase Nextdoor membership through residential flyer (sending Feb).
- Following Neighbourhood Policing Peer Review (Surrey Police) there is an opportunity to utilise partner data sets quickly via 'Acorn' to map communities better – P&P Hub to research.
- Prioritise P&P Hub restructure and identify SMEs for Community Thematic areas including suicide prevention, mental health, homelessness and hate crime.
- Promote opportunities in the Special Constabulary and other voluntary roles internally and externally with our communities.
- Increase cluster panel attendance through a comprehensive media strategy.
- Continue outreach to ensure our recruitment pool remains diverse for 23/24 intakes, plus focus on expanding recruitment for Special Constabulary

Key Performance Measures

Police Community Encounters – Use of Powers

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

i. Number sampled past month
ii. Number identified with learning
iii. Number identified as best practice

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

i. Number sampled / observed past month
ii. Number identified with learning
iii. Number identified as best practice

Community confidence / victim surveying measures

1. Confident & satisfied with City of London Police Actions
2. Reducing the BAME & Gender satisfaction gap in survey data

Number of community events attended

1. Number of community events attended over the last month
2. Outreach recruitment events expression of interest by ethnicity & gender

Workstream	Leadership & Culture	Owner	Ch Supt AF/NFIB	Date	23/01/23	Project RAG		Benefit RAG	TBD

Workstream objectives

- Leaders to ensure they create an inclusive culture within the organisation
- Create a culture where people feel confident to share their protected characteristics
- Encourage leaders to continuously improve their approach to inclusivity and ensure learning is regular ang ongoing
- Develop a framework of champions and senior leaders to drive forward CoLP's E&I agenda and work with internal and external partners to promote activity
- Recognise and reward good work and bravery across E&I
- Undertake annual workforce surveys
- Further develop consultation and feedback mechanisms that enable all staff to take part in broad organisational decision making
- Scope partnership and secondment opportunities outside the organisation to enhance and build new skills in leaders

Priority Deliverables

Key Deliverable / Key Performance Indicator	Target Date
Launch internal staff gateway events (*Our People – Inclusivity Programme*)	Complete
KPI: 100% of eligible and available staff have attended one of the mandatory inputs	03/23
Develop an E&I secondment framework for leaders / volunteers	Q1 23
KPI: Number of staff members engaged in external secondments / support to voluntary organisations (positive direction of travel)	Q2 23
KPI: Annual Staff Survey - positive direction of travel for leadership & culture related responses	Q2 23
Complete a data bias review and recommendations	03/23
Introduce an annual E&I award as part of future event	03/23
Further develop Diversity Allies Scheme	Q1 2023

Progress since last update

- CoLP launched its internal series of *Our People – Inclusivity Programme* events. These two-hour sessions, hosted at the Aviva building, provided a gateway to the force's wider programme of activities (to commence in 2023). The vast majority of police officers and police staff experienced one of the events, albeit a series of national rail strikes impacted on attendance. Each event included an interactive section, with feedback currently being used to shape the menu of options for future activities.
- The force's data bias working group concluded its year-long review of this subject area. Proposals will be brought to the March E&I Strategic Board for consideration and approval.
- The results of CoLP's annual workforce survey have been shared with staff, with unit heads / team leaders being given the task of creating relevant action plans.

Key next steps

- Cross-check participation in initial gateway events, and provide alternative access where appropriate.
- Finalise and publish the plan for *Our People – Inclusivity Programme* activities in 2023.
- Formalise data bias work within the existing force governance structure - including the integration of the NPCC's *Data Literacy Framework* (decision paper to be submitted to E&I Strategic Board).
- Review annual staff survey results (leadership & culture related responses) - and ensure that areas for improvement are reflected in unit / team action plans.
- Finalise the plan for CoLP's annual E&I award.

Workstream	Retention and Exiting	Owner	T/DCS Bradford	Date	23/01/23	Project RAG		Benefit RAG	

Workstream objectives

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

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

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

Priority Deliverables

Description	Date
Agree a new process map for our exiting employee journey	01/11/22
Draw best practice and academic research on the topic of retention and exit interviews	01/11/22
Seek additions/alteration to HR held SOP	01/12/22
Implement the cultural change for adding retention conversations to BAU	01/01/23

Progress since last update

Work strand 1 – The identification and recording of data use.
Increase completion rates –Publishing the data and evidence will also encourage people to complete the exit interview.
Knowledge sharing – Due to the relative low number of people leaving the organisation, improved data disaggregation per team/department/unit over different time periods would enable managers to see trends.
Exit interview question themes – If the responses were broken down by themes, it would help the force understand the cultural/societal behaviours that cause employees to leave.
Work strand 2 – A review and agreement of the Exit Interview process.
Collaborative working between specialist advisors – Collaborative working between HR, staff support initiatives and the line manager, would address any gaps in knowledge and timescales, and ensure the best outcome for the employee and the organisation.
Introduction of a Stay Interview/Retention Conversations – The Stay Interview allows the line managers to address any issues the employee has, in an attempt to stop them from acting on their desire to leave.
Advertisement of inclusive developmental/mentoring opportunities – All developmental opportunities should be promoted locally by all line managers/team leaders which will help encourage more people to stay.
Work strand 3 – Exit interview questions.
Personal Development Report (PDR) – It would be helpful to give all line managers a PDR objective that requires them to complete all people management process.
Training to be provided on the difference between police staff and police officers terms and conditions of employment – Training should be provided to all line managers on the differences.
Work strand 4 – Retention conversations.
Template on how to conduct the exit and stay interview – A Questions and next steps guide, that guides all managers through the exiting interview process.
Mandatory Management Development Programme (MDP) – Which provides line managers with the skills and tools that teach managers how to engage with their employees and address any issues that are raised.
Re-entry scheme for Police Staff – The force has a re-entry scheme for police officers and not police staff. Police Staff should also be given the opportunity to re-enter.

Key next steps

- The new EDI Strand working group, which is made up of key specialist advisors and departments, will collaborate to implement and embed the recommended changes.
- The working group will continue to consult with key stakeholders, staff support representatives and force employees.

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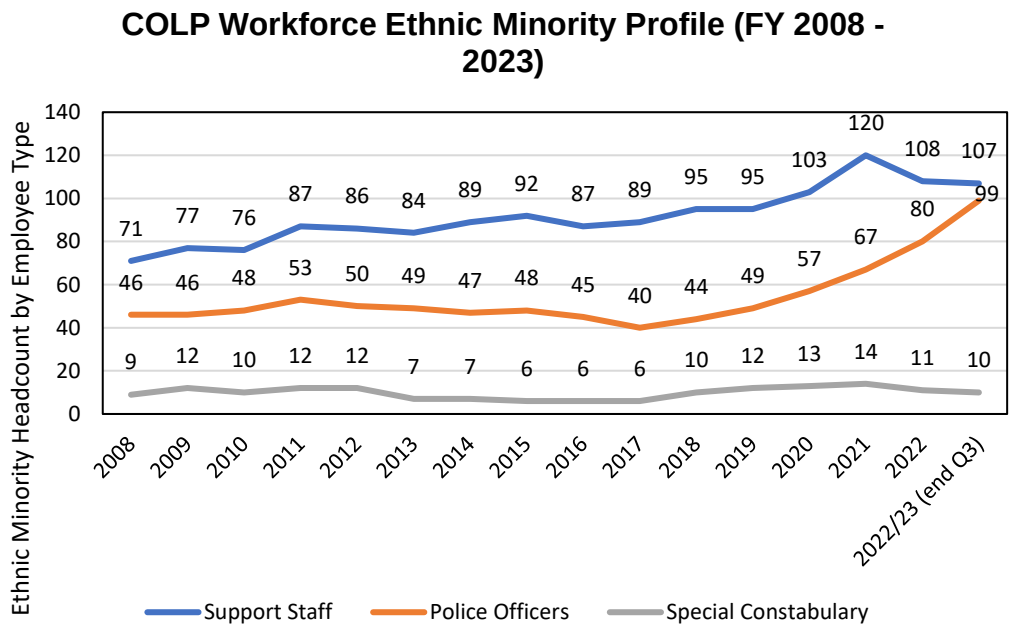
Equality and Inclusion – PSIC/PAB - E&I/Professionalism and Trust report

Force Demographics

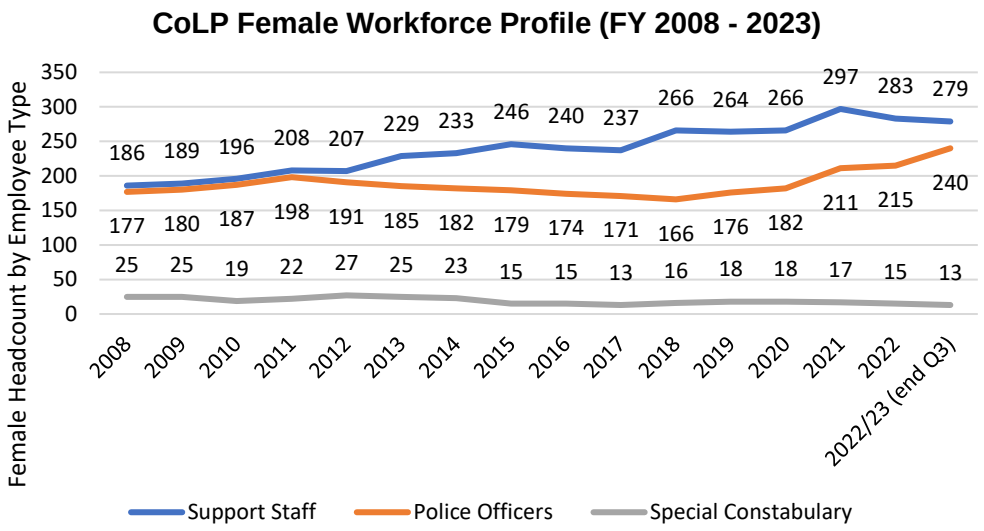
- The CoLP ended quarter 3 (Q3) of 2022/23, 31 December 2022, with an Officer headcount of 1015 (increase from 970 at 30 September 2022), and Staff headcount of 470 (decrease from 480 at 30 September 2022).

The graph below represents the number of Ethnic Minority Police Staff, Officers, and Special Constabulary within the CoLP at the end of each financial year from 2007/8 to 2021/22 and the first 9 months of 2022/23 (2022/23 end Q3).



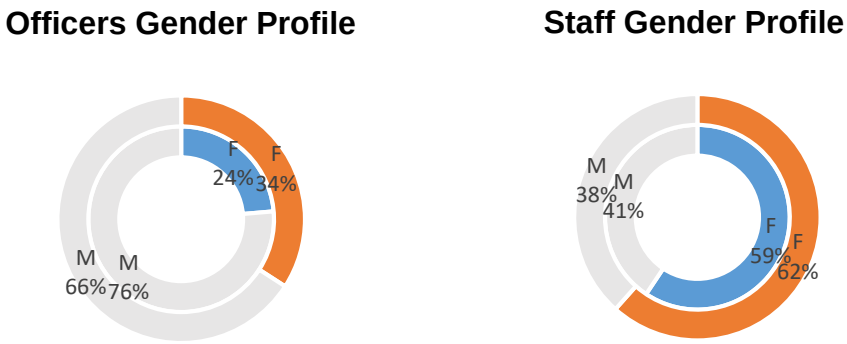
Ethnicity

- For the reporting period (1 October 2022 to 31 December 2022), the number of Ethnic Minority (excluding white minority) Officers has increased from 90 (September 2022) to 99, which is 9.8% of the total Officer headcount. The increase is likely due to the diversity in Student Officer in November. The number of Ethnic Minority (excluding white minorities) Police Staff has slightly decreased from 110 in September 2022 to 107 in December 2022, which is 22.8% of the total Staff headcount.
- When compared nationally, CoLP Staff Ethnic Minority representation rate is currently ranked second highest among all national forces (excluding BTP) and is sixth highest for Officer representation (excluding BTP).
- The force's Equality & Inclusion Operational Board oversees the work on the NPCC plan. In 2023, the force will continue to use innovative advertising and attraction campaigns, support internal applicants through application writing and interview workshops and use a buddy system where Ethnic Minority officers are supported by a buddy when they join the force.



City of London – December 2022

National Comparison (England and Wales) - March 2022



Gender

- During the reporting period, the number of female Police Officers has increased from 231 in September 2022 to 240 in December 2022. At the end of December, the percentage of female Police Officers stands at 23.6% of the total Office headcount. 16 (22.2%) of 72 Officer joiners were female in the reporting period.
- The number of female Police Staff has decreased from 283 (September 2022) to 279 (December 2022), as a percentage this means 59.4% of Staff are female.
- In regard to improving our female representation we continue to work on retention strategies such as supporting females back to the workplace following maternity leave as well as bespoke attraction campaigns and amended recruitment adverts to support flexible working. During our student officer campaigns in 2022, we ran positive action events including webinars to candidates where female officers took part to encourage female applicants to apply.

Disability

- The CoLP's disability profile shows 37 Police Officers (3.6%) and 21 Police Staff (4.5%) currently identify themselves as having a disability. At the end of December 2022, 58 Officers are working under 'recuperative duties' (short term) and 37 Officers are on adjusted duties (long term). The force has in-house Dyslexia Assessors which support colleagues on all matters related to dyslexia including reasonable adjustments.

Age

- The current age profile of the Police Staff workforce ranges between 18 and 65+. There are currently 176 Staff aged 50+. 294 members of Staff are between 18 – 49 years old.
- The age profile of Police Officers ranges between 18 and 65. There are currently 158 Police Officers aged 50+. Officers can retire once they have complete 30 years' service (depending on pension scheme). There are 9 Officers with 30+ years' service and could be eligible to retire, and 23 Officers with 29 years' service that could be eligible to retire in 2023/2024.

Sexual Orientation

- All Police Officers and Police Staff are invited to define their sexual orientation on their application, onboarding and via self-service. Across the workforce, 48 members of Staff and/or Police Officers have identified themselves as gay, lesbian or bisexual, which is 3.2% of the total Officer and Staff headcount. This is a 6.7% increase from 45 previously reported. The number of individuals that did not disclose or selected "prefer not to say" has decreased from 807 to 789.

Promotions

- There was 1 internal promotion campaign for Superintendents rank between October 2022 – December 2022. This received 22 applications, 36% of applicants were female and none were from an ethnic minority background. 16 applicants were successfully shortlisted for interview, of which 37.5% were female.

Religion and Belief

The table below show the headcount and percentage of religion and belief for a combined total of Officers and Staff.

Religion/Belief	Headcount	Percentage
Buddhist	6	0.4%
Christian	365	24.6%
Hindu	11	0.7%
Jewish	4	0.3%
Muslim	37	2.5%
No Religion	367	24.7%
Not Disclosed	667	44.9%
Any other Religion	19	1.3%
Sikh	9	0.6%

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Appendix C – KPI Measures Table (January 2023 update)

Workstream	Overview of activity	Success measures
Community Engagement	Increasing our legitimacy & confidence within communities through active engagement with all communities. Increasing confidence by effective response to hate crime & scrutiny of police power such as stop and search	1.Community confidence & satisfaction measures through surveying victims of crime & the wider community 2. Sampling of stop & search & use of force incidents by our independent Advisory Scrutiny Group % graded as good & excellent v those requiring improvement 3. Number & breadth of community events attended each month and proactive communications out to communities
Recruitment Development & Progression	Building a diverse workforce in tune with London including people from black & minority communities, women, and LGBT. Ensuring we develop our workforce to achieve their potential and be the very best for the community. We will strive to improve our representation of underrepresented groups at all levels of the organisation & in specialist roles.	1.To recruit 40% of visible ethnic minority student officers in each new intake 2.Per year we improve our representation of visible ethic minority employees by 3.23% 3. Increasing number of employees from a black minority background successful at promotion processes 4.The total number of new joiners to The Force each year is at least 51% female to achieve an overall increase of 2.6% per year of female representation across the service 5. Per year to improve 0.35% employees from a LGBT background
Culture & Leadership	Work to build leadership capability across the force and build a workforce culture that it is truly inclusive & embeds our diversity & inclusion ambitions at all levels of the force. A workplace which people are proud of & one where the force is an employer of choice.	1.Our staff engagement score through surveying over the next 3 years increases Scores specifically relating to feelings of inclusion, leadership & culture related responses 2. 100% of eligible workforce having attended annual values, standards & ethics inputs by 03/23 3. No of staff members engaged in external attachments & CPD events/ support to voluntary organisations (+ direction of travel)
Wellbeing	Taking a proactive and preventative approach to workforce wellbeing, as well as intervening at the earliest opportunity to help protect our people & increase productivity	1. Specific staff survey questions in relation to feelings of well-being to improve over the 3 years. 2. Op Hampshire 75% outcome rate for assaults and hate crime committed towards staff.
Retention & Exiting	Ensuring that the service retains talent particularly from under-represented groups. Exploit opportunities for entry & re-entry at different levels & specialisms into the service. Understand why staff are exiting the service & use insight & data to improve retention.	1. Line managers to offer an exit interview to all those intending to leave – Target of 100% 2. The % exit interviews completed officers and staff 3. Retention rates over the next 3 years (excluding retirements, transferees & ill health) are improved against the 2021 baseline 4. % of leavers that are contacted by the force within 12 months in respect of opportunities to re-join 5. Retention – Black, Asian and Minority staff Black, Asian & minority ethnic attrition rates for voluntary leavers are equal to or better than the rates for non-Black, Asian and Minority Ethnic colleagues (xx% the baseline figure now) 6. Retention female staff - female attrition rates for voluntary leavers are equal to or better than the rates for male leavers (xx% baseline)

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Police Complaints Information Bulletin

Force Commentary Sheet

Reporting Period: Reporting Period: 1 April 2022 – 30 September 2022

Professional Standards Departments may wish to comment on the figures presented in their Police Complaints Information Bulletin. This sheet provides a standard format to do this for the above time period. There is also a general comments box for questions or comments about the Bulletin.

Each bulletin contains a large amount of information; therefore, you may wish to focus your comments on key areas. For example, the aims of the reforms included easier access and a system focussed on learning, does the data support this? Why do figures for your force differ when compared to the most similar force average or national result? There may be a number of reasons for differences, and they may include the following examples:

- changes in resources to handle complaints;
- changes in how complaints are being managed;
- wider activities within the force that have an impact on the number and type of complaints received.

The IOPC is keen to see your commentary and would be grateful if you could send your completed sheet to performance.framework@policeconduct.gov.uk The IOPC will edit commentary sheets before they are placed on the IOPC website to remove these explanatory notes and any general comments. We will not edit the commentary itself.

Commentary:

As National Lead Force for fraud, City of London Police (CoLP) logs a high number of service recovery and complaint matters which relate to the national fraud reporting system, Action Fraud, and the initial reporting/investigation of fraud. Many of these complaints do not relate to the CoLP.

Since 1st April 2013 Action Fraud records all initial fraud reporting for the UK, which is fed into the National Fraud Intelligence Bureau (NFIB) hosted by CoLP. There is a nationally agreed process in place to collate, disseminate, or investigate these fraud reports, either within the CoLP or by another Force.

The IOPC illustrates Action Fraud complaints within the total complaint figures for the CoLP. This has an adverse effect on CoLP complaints figures and the number of complaints and matters logged outside Schedule 3 are higher than if Action Fraud related matters were logged and shown as a separate IOPC bulletin.

74% of all logged complaints in the CoLP relate to Action Fraud.

This IOPC bulletin does not provide an accurate measure of City of London police complaints data.

Section A1.3- allegations logged-top allegations categories

The number of allegations logged under 'Delivery of duties and service' is 232 (81%) and much higher than the National percentage of 55% Of which the allegation 'Police action following contact' is 130 (56%). These figures represent higher than the national percentage and relate almost entirely to Action Fraud rather than to City of London (CoLP) directly.

Section A1.4 – allegations logged (category)

The vast majority of allegations made are within the category of 'delivery of duties and service' and most of these show 'fraud' as a factor. As already highlighted these almost all relate CoLP's National Lead Force role as opposed being CoLP specific allegations.

Section A.3.1 – How allegations handled & decisions

The impact of Action Fraud complaints on the total City of London data has been outlined above. Most Action Fraud complaints are logged outside of Schedule 3. This is much higher percentage than the national data. This has a further impact on CoLP figures which show a high proportion of outside schedule 3 complaints.

Section A.3.2 – allegations decisions (category)

The impact of Action Fraud complaints on data has been outlined above. Most Action Fraud complaints are resolved and this has a further impact on CoLP figures which show a high proportion of resolved complaints.

General comments and feedback about the bulletin:

Police Complaints Information Bulletin

IOPC Independent Office for Police Conduct

Appropriate Authority: City of London **Reporting Period: 01 April 2022 - 30 September 2022 (Q2 2022/23)**

Most Similar Force (MSF) Group:

About this bulletin

This bulletin presents information about complaints defined under the Police Reform Act 2002 (PRA 2002), as amended by the Police and Crime Act 2017. The legislation came into effect on 1 February 2020 (4 January 2021 for the British Transport Police).

It sets out performance against a number of measures and compares force results to their most similar force (MSF) group and with the overall result for all forces (national).

Changes since the previous bulletin

Sections B1 and B2: These have been removed from this bulletin as we are working with our ICT department to improve this data.

Section D3: Following feedback from forces. this section now includes number of LPB reviews completed as well as the percentages.We are working with our ICT department to add number of IOPC reviews completed to future bulletins.

Sections E1.2 Misconduct proceedings are only applicable to complaint cases which are investigated and subject to Special Procedures. A further table has been added to show misconduct proceedings, UPP and RPRP on these cases only.

Section E2 has been removed as the data is now included in section E1.2

Contents

Section A1:1: Complaint cases logged and initial handling
Section A1.2: Allegations logged – what has been complained about
Section A1.3: Allegations logged – what has been complained about – top five allegation categories and their subcategories
Section A1.4: Allegations logged – what has been complained about (category) and the situational context of allegations (factors)

Section A2: Allegations timeliness

Section A3.1: How allegations were finalised and their decisions
Section A3.2: Allegation decisions by what was complained about (category)

Section A4: Complaint cases timeliness

Section C: Referrals

Section D1: Reviews received
Section D2: Reviews timeliness
Section D3: Decisions on reviews

Section E1.1: Allegation actions – on complaint cases handled outside of Schedule 3
Section E1.2: Allegation actions – on complaint cases handled under Schedule 3

Notes

Acronyms used in this bulletin

Force – year to date force numbers

IOPC – Independent Office for Police Conduct

Inc. – including

Ind – independent investigation

Loc – local investigation

LPB – local policing body

MSF – most similar force

Nat. – national

No. – number

PRA – the *Police Reform Act 2002*

RPRP – reflective practice review process

SPLY - Same period last year

UPP – unsatisfactory performance procedure

Police Complaints Information Bulletin

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IOPC Independent Office for Police Conduct

Section A1.1: Complaint cases logged and initial handling

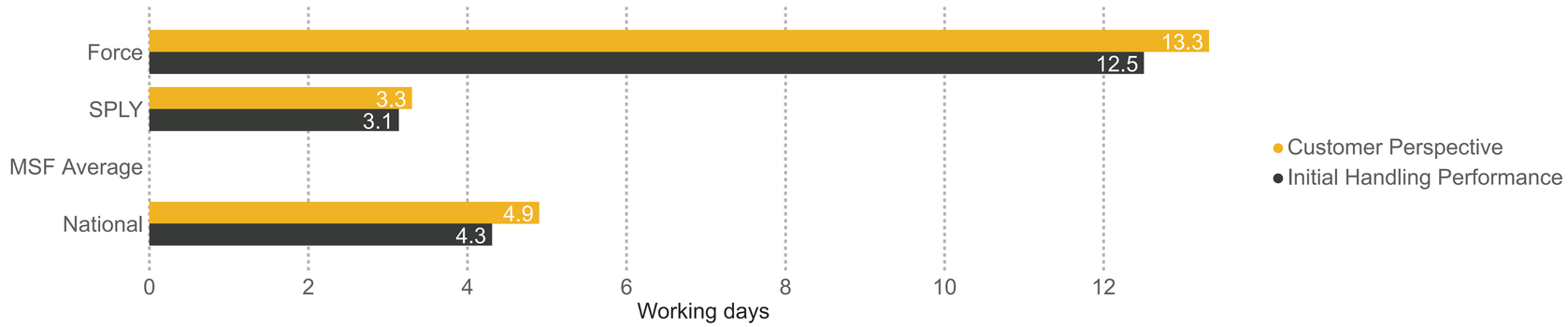
This section presents information relating to the force's contact with customers and their initial handling of the complaint cases. It shows how long, on average, it takes from the customer's perspective from when they made the complaint and the force's performance of the initial handling from when it received the complaint.

Complaint cases with 'invalid dates' have been removed from timeliness measures. Please refer to the performance framework counting rules and calculations on the IOPC website for explanations of customer perspective, initial handling and invalid dates.

To contact complainants

Average number of working days...	Customer perspective	Initial handling performance
Force	13	13
SPLY	3	3
National	5	4

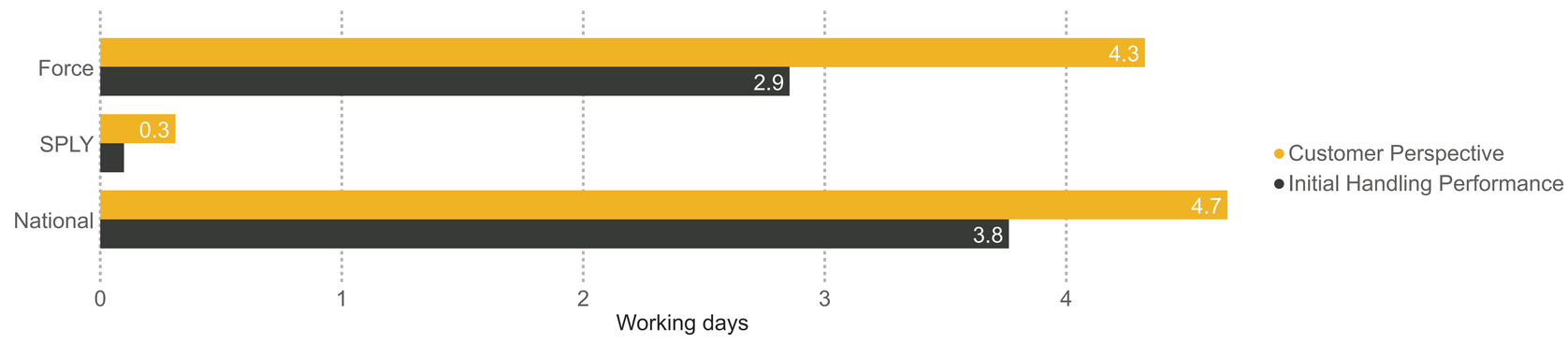
Average number of working days to contact complainants



To log complaint cases

Average number of working days...	Customer perspective	Initial handling performance
Force	4	3
SPLY	0	0
National	5	4

Average number of working days to log complaint cases



Please note: average times presented in the above tables are rounded to the nearest whole number. In comparison, the charts present the exact result.

Complaint cases logged

	Force	SPLY	MSF Average	National
Complaint cases logged	261	245		40,738
No. of complaint cases logged per 1,000 employees	180	170		165

Reasons complaint cases are recorded under Schedule 3 of the *PRA 2002*

The below table presents the number of complaint cases handled under Schedule 3 of the *PRA 2002* (formal handling) and the reasons why.

.	Force		SPLY		MSF Average		National	
Reason complaint case recorded under Schedule 3	No.	%	No.	%	No.	%	No.	%
AA/body responsible for initial handling decides	16	39 %	51	74 %			6,376	42 %
Complainant wishes the complaint be recorded	0	0 %	5	7 %			3,661	24 %
Dissatisfaction after initial handling	22	54 %	7	10 %			2,266	15 %
Nature of the allegation(s) in the complaint	3	7 %	6	9 %			2,986	20 %

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Reporting Period: 01 April 2022 - 30 September 2022 (Q2 2022/23)

IOPC Independent Office for Police Conduct

Section A1.2: Allegations logged - what has been complained about

This section presents information that shows what people complain about. Allegation categories capture the root of the dissatisfaction expressed in a complaint. A complaint case will contain one or more allegations and one category is selected for each allegation logged.

Please refer to our Guidance on capturing data about police complaints for guidance on logging allegations and complaint category definitions.

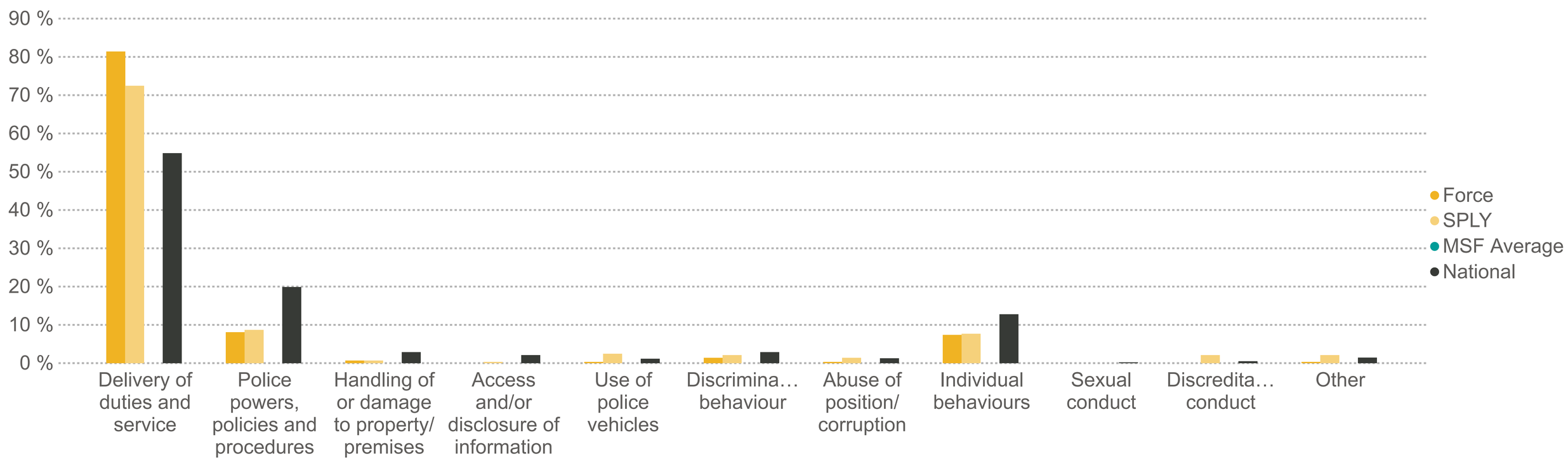
Due to some allegations not having a recorded category, the totals differ in the two tables.

Allegations logged

	Force	SPLY	MSF Average	National
Allegations Logged	285	287		64,261
No. of allegations logged per 1,000 employees	197	199		261

What has been complained about

.	Delivery of duties and service	Police powers, policies and procedures	Handling of or damage to property/ premises	Access and/or disclosure of information	Use of police vehicles	Discriminatory behaviour	Abuse of position/ corruption	Individual behaviours	Sexual conduct	Discreditable conduct	Other	Total
Force	232	23	2	0	1	4	1	21	0	0	1	**285**
SPLY	208	25	2	1	7	6	4	22	0	6	6	**287**
MSF Average												
National	35,253	12,788	1,856	1,353	726	1,841	811	8,215	121	307	951	**64,222**
Force	81 %	8 %	1 %	0 %	0 %	1 %	0 %	7 %	0 %	0 %	0 %	**100 %**
SPLY	72 %	9 %	1 %	0 %	2 %	2 %	1 %	8 %	0 %	2 %	2 %	**100 %**
MSF Average												
National	55 %	20 %	3 %	2 %	1 %	3 %	1 %	13 %	0 %	0 %	1 %	**100 %**



Police Complaints Information Bulletin

Appropriate Authority: City of London

Reporting Period: 01 April 2022 - 30 September 2022 (Q2 2022/23)

IOPC Independent Office for Police Conduct

Section A1.3: Allegations logged – what has been complained about – top five allegation categories and their subcategories

Category	Subcategory	Force No.	Force %	SPLY No.	SPLY %	National No.	National %
Delivery of duties and service	**Total**	**232**	**81 %**	**208**	**72 %**	**35,253**	**55 %**
	Police action following contact	130	56 %	4	2 %	16,077	46 %
	Decisions	34	15 %	155	75 %	4,303	12 %
	General level of service	37	16 %	42	20 %	11,726	33 %
	Information	31	13 %	7	3 %	3,147	9 %
Police powers, policies and procedures	**Total**	**23**	**8 %**	**25**	**9 %**	**12,788**	**20 %**
	Stops, and stop and search	1	4 %	5	20 %	735	6 %
	Searches of premises and seizure of property	7	30 %	1	4 %	1,637	13 %
	Power to arrest and detain	6	26 %	3	12 %	2,013	16 %
	Detention in police custody	2	9 %	2	8 %	1,709	13 %
	Bail, identification and interview procedures	1	4 %	0	0 %	529	4 %
	Use of force	4	17 %	6	24 %	3,566	28 %
	Evidential procedures	0	0 %	1	4 %	942	7 %
	Out of court disposals	0	0 %	1	4 %	183	1 %
	Other policies and procedures	2	9 %	6	24 %	1,473	12 %
	Use of police systems	0	0 %	0	0 %	1	0 %
	Impolite and intolerant actions	0	0 %	0	0 %	0	0 %
Handling of or damage to property/ premises	**Total**	**2**	**1 %**	**2**	**1 %**	**1,752**	**3 %**
	Handling of or damage to property/ premises	2	100 %	2	100 %	1,752	94 %
Discriminatory behaviour	**Total**	**4**	**1 %**	**6**	**2 %**	**1,841**	**3 %**
	Age	0	0 %	0	0 %	13	1 %
	Disability	1	25 %	2	33 %	299	16 %
	Gender reassignment	0	0 %	0	0 %	22	1 %
	Marriage and civil partnership	0	0 %	0	0 %	3	0 %
	Pregnancy and maternity	0	0 %	0	0 %	2	0 %
	Race	3	75 %	4	67 %	1,037	56 %
	Religion or belief	0	0 %	0	0 %	41	2 %
	Sex	0	0 %	0	0 %	243	13 %
	Sexual orientation	0	0 %	0	0 %	47	3 %
	Other	0	0 %	0	0 %	134	7 %
Individual behaviours	**Total**	**21**	**7 %**	**22**	**8 %**	**8,214**	**13 %**
	Unprofessional attitude and disrespect	17	81 %	13	59 %	2,375	29 %
	Lack of fairness and impartiality	0	0 %	0	0 %	1,303	16 %
	Overbearing or harassing behaviours	2	10 %	4	18 %	1,390	17 %
	Impolite language / tone	2	10 %	1	5 %	2,188	27 %
	Impolite and intolerant actions	0	0 %	4	18 %	958	12 %

This section presents the five most commonly recorded categories for allegations that have been logged.

A complaint case will contain one or more allegations and one category (and sub-category, where available) is selected for each allegation logged.

Total % is of the total number of allegations logged.

Where the subcategory is 'None', this has been excluded from this table. For full counts please see section A1.2

Police Complaints Information Bulletin

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Reporting Period: 01 April 2022 - 30 September 2022 (Q2 2022/23)

IOPC Independent Office for Police Conduct

Section A1.4: Allegations logged – What has been complained about (category) and the situational context of complaints (factors)

	Allegation category											
Factors	**Delivery of duties and service**	**Police powers, policies and procedures**	**Handling of or damage to property/ premises**	**Access and/or disclosure of information**	**Use of police vehicles**	**Discriminatory behaviour**	**Abuse of position/ corruption**	**Individual behaviours**	**Sexual conduct**	**Discreditable conduct**	**Other**	**Total**
Arrest	1	8	0	0	0	0	0	1	0	0	0	**10**
Custody	1	1	0	0	0	0	0	0	0	0	0	**2**
Fraud	206	0	0	0	0	1	0	7	0	0	0	**214**
Investigation	4	0	0	0	0	0	0	0	0	0	0	**4**
Neighbourhood policing	6	0	0	0	0	0	0	1	0	0	0	**7**
None	13	12	2	0	0	2	1	11	0	0	1	**42**
Restraint equipment	0	1	0	0	0	0	0	0	0	0	0	**1**
Roads/traffic	1	0	0	0	1	1	0	1	0	0	0	**4**
Stop and/or search	0	1	0	0	0	0	0	0	0	0	0	**1**

This section presents information that shows what people are complaining about using a combination of allegation categories and factors. Categories capture the root of the dissatisfaction expressed in a complaint. Factors capture the situational context of the dissatisfaction expressed in a complaint. The combination of categories and factors provides a richer picture of what people are complaining about compared to the categories alone.

Each allegation should have a single category selected. However, multiple factors can be selected on a single allegation. Therefore, the sum of factors will not equal the total allegations logged in each category. Please refer to our Guidance on capturing data about police complaints for definitions of categories and factors.

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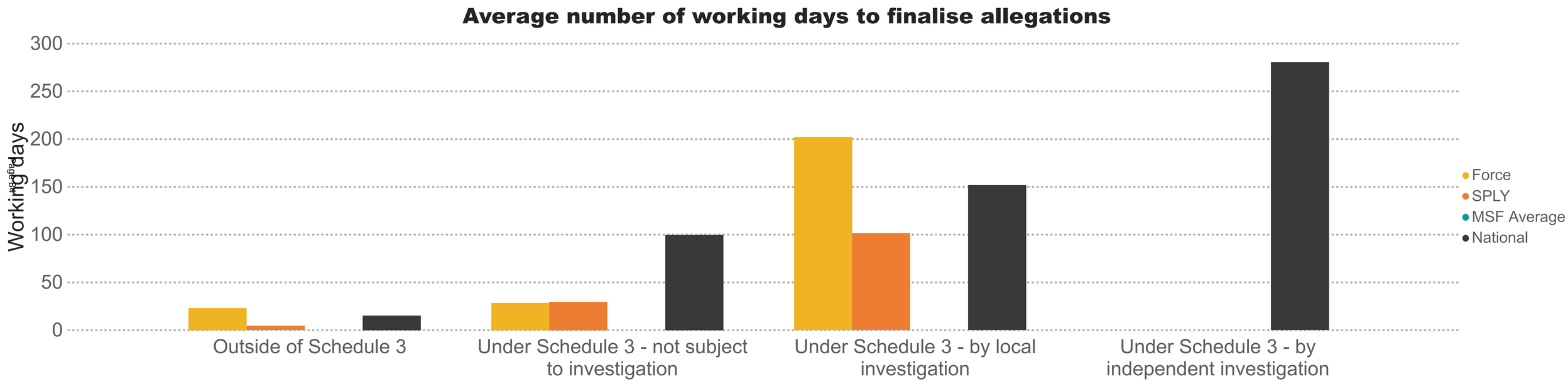
IOPC Independent Office for Police Conduct

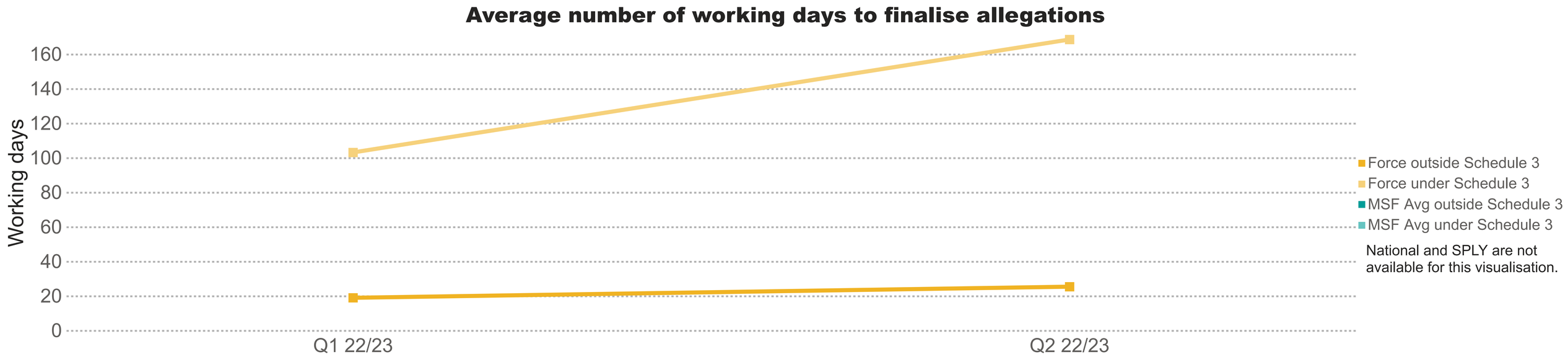
Section A2: Allegations timeliness

Average number of working days to finalise allegations	Force	SPLY	MSF Average	National
Outside of Schedule 3	23	5		15
Under Schedule 3 - not subject to investigation	28	30		100
Under Schedule 3 - by local investigation	202	102		152
Under Schedule 3 - by directed investigation	0	0		455
Under Schedule 3 - by independent investigation	0	0		281

This section presents the time it takes the force to finalise allegations by how they were handled. If gives a breakdown of allegations handled informally outside of Schedule 3 and those that were handled formally by either by investigation or handled other than by investigation. Timeliness is calculated from the date the allegation was received by the force.

Allegations with 'invalid dates' have been removed from the data shown. Please refer to the performance framework counting rules and calculations on the IOPC website for an explanation of invalid dates.





Police Complaints Information Bulletin

Appropriate Authority: City of London

Reporting Period: 01 April 2022 - 30 September 2022 (Q2 2022/23)

IOPC Independent Office for Police Conduct

Section A3.1: How allegations were handled and their decisions

This section presents a breakdown of how allegations were handled information and the decisions being given. An allegation decision is logged for each allegation finalised.

The allegation decision reflects how the complaint case has been handled, with different decisions available for the different means of handling. Both the allegation decisions and the subsequent actions available will depend on two things: firstly, whether the complaint case has been handled outside or under Schedule 3; and secondly, the means of handling where it has been dealt with under Schedule 3.

Please refer to our Guidance on capturing data about police complaints for details of allegation decisions.

How allegations were handled	Force No.	Force %	MSF Average No.	MSF Average %	National No.	National %
Under Schedule 3 investigated (not subject to special procedures)	19	8 %			6,990	11 %
Under Schedule 3 investigated (subject to special procedures)	5	2 %			648	1 %
Under Schedule 3 - not investigated	16	7 %			25,901	42 %
Outside of Schedule 3	192	83 %			27,978	45 %
Total	**232**	**100 %**			**61,517**	**100 %**

Please note that figures presented in these tables may be under-representing the number of allegations finalised under Schedule 3 and investigated (not subject to special procedures), instead grouping some of these allegations as finalised under Schedule 3 and not investigated. This is because police forces were not able to consistently and accurately collect this data on their systems until the implementation of an upgrade from November 2020.

How allegations were handled	Outside of Schedule 3				Under Schedule 3 - not investigated				Under Schedule 3 investigated (subject to special procedures)				Under Schedule 3 investigated (not subject to special procedures)			
Allegation decision	**Force %**	**Force No.**	**Nat. %**	**Nat. No.**	**Force %**	**Force No.**	**Nat. %**	**Nat. No.**	**Force %**	**Force No.**	**Nat. %**	**Nat. No.**	**Force %**	**Force No.**	**Nat. %**	**Nat. No.**
No further action					6 %	1	9 %	2,297			1 %	5	16 %	3	7 %	491
Regulation 41 applies							0 %	29							1 %	61
Service provided - unable to determine							6 %	1,665			0 %	3			5 %	351
Service provided - not acceptable					6 %	1	14 %	3,521			4 %	23	32 %	6	12 %	812
Service provided - acceptable					88 %	14	66 %	17,149	20 %	1	16 %	102	47 %	9	73 %	5,073
Not Resolved			9 %	2,470												
Resolved	100 %	192	91 %	25,507												
No Case to Answer									20 %	1	55 %	356				
Case to Answer									60 %	3	23 %	150				
Withdrawal							5 %	1,236			1 %	9	5 %	1	3 %	202
Total	**83 %**	**192**	**45 %**	**27,977**	**7 %**	**16**	**42 %**	**25,897**	**2 %**	**5**	**1 %**	**648**	**8 %**	**19**	**11 %**	**6,990**

Police Complaints Information Bulletin

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Reporting Period: 01 April 2022 - 30 September 2022 (Q2 2022/23)

Independent Office for Police Conduct

Section A3.2: Allegation decisions by what was complained about (category)

This section presents information about allegations handled both informally and formally, grouped by the allegation decision and the category selected on each allegation. Each allegation has a single category selected.

	Allegation category											
Allegation decisions	**Delivery of duties and service**	**Police powers, policies and procedures**	**Handling of or damage to property/ premises**	**Access and/or disclosure of information**	**Use of police vehicles**	**Discriminatory behaviour**	**Abuse of position/ corruption**	**Individual behaviours**	**Sexual conduct**	**Discreditable conduct**	**Other**	**Total**
No further action	1	1	0	0	0	0	1	1	0	0	0	**4**
Regulation 41 applies	0	0	0	0	0	0	0	0	0	0	0	**0**
Service provided - unable to determine	0	0	0	0	0	0	0	0	0	0	0	**0**
Service provided - not acceptable	1	2	0	0	0	0	0	3	0	0	1	**7**
Service provided - acceptable	14	8	1	1	0	0	0	0	0	0	0	**24**
Not Resolved	0	0	0	0	0	0	0	0	0	0	0	**0**
Resolved	170	7	1	0	1	1	0	11	0	0	1	**192**
No Case to Answer	0	1	0	0	0	0	0	0	0	0	0	**1**
Case to Answer	0	0	0	0	1	0	0	1	0	0	1	**3**
Withdrawal	0	1	0	0	0	0	0	0	0	0	0	**1**

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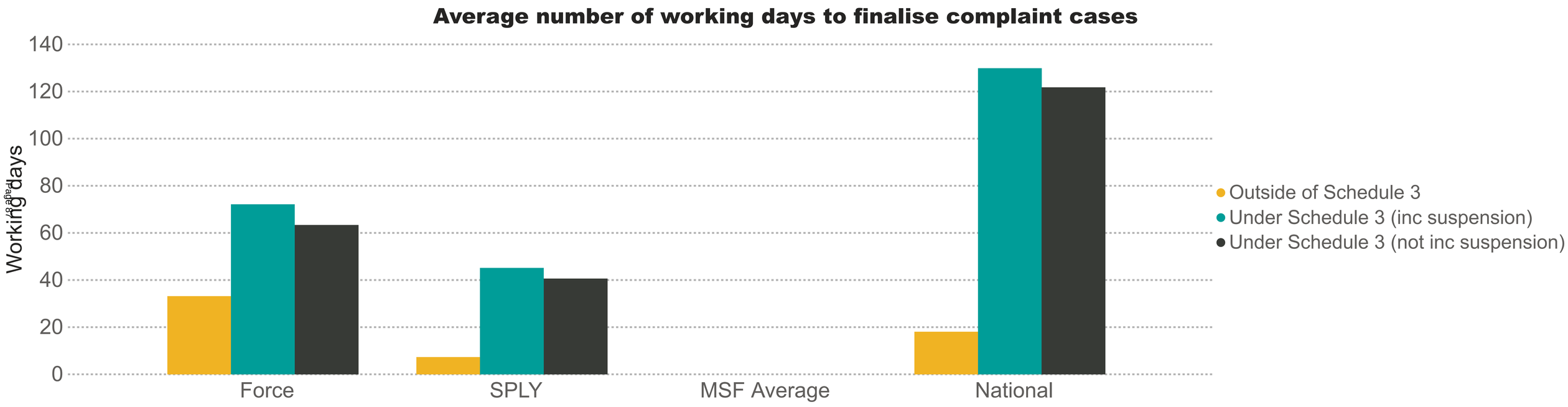
IOPC Independent Office for Police Conduct

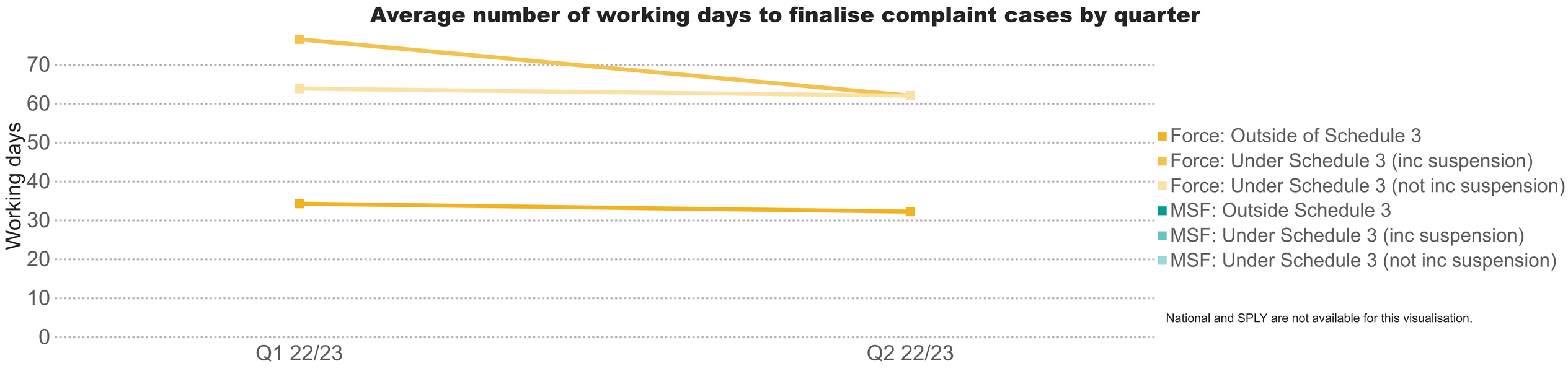
Section A4: Complaint cases finalised - timeliness

Average number of working days to finalise complaint cases	Force	SPLY	MSF Average	National
Outside of Schedule 3	33	7		18
Under Schedule 3 (inc suspension)	72	45		130
Under Schedule 3 (not inc suspension)	63	41		122

This section shows the time it takes the force to finalise complaint cases from the customer's perspective. It gives a breakdown of the time taken to finalise complaint cases handled informally and those that are handled formally under Schedule 3. Timeliness is calculated from the date the complaint was made.

Complaint cases with 'invalid dates' have been removed from the data shown. Please refer to the IOPC website performance framework counting rules and calculations on the for an explanation of invalid dates.





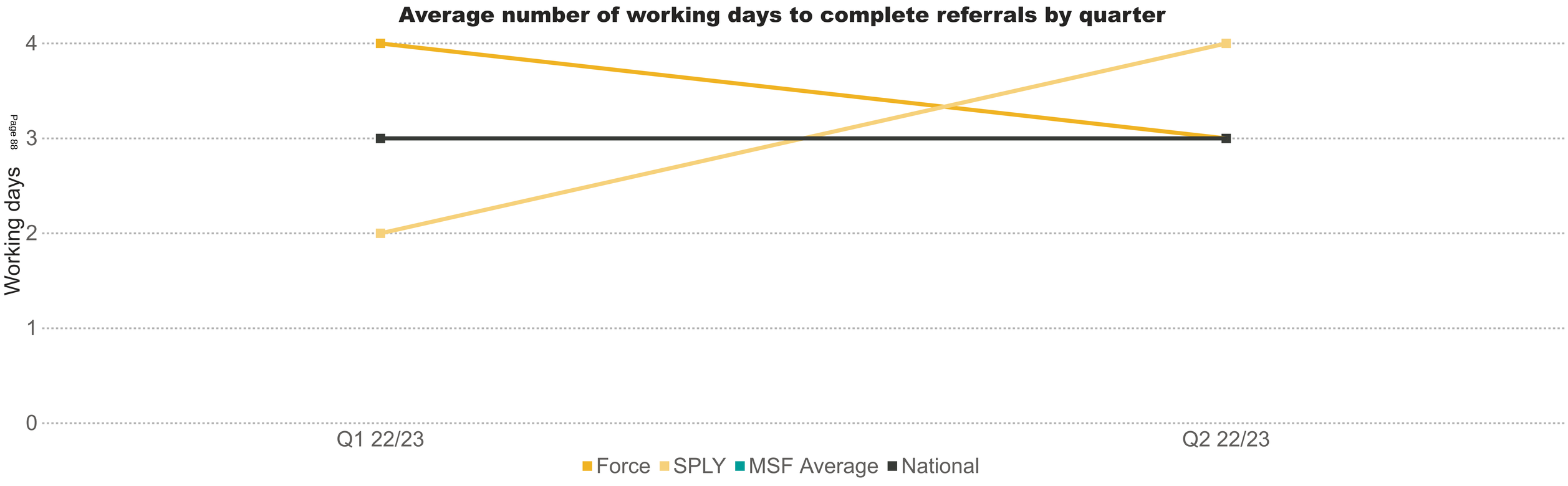
Police Complaints Information Bulletin

Appropriate Authority: City of London

Reporting Period: 01 April 2022 - 30 September 2022 (Q2 2022/23)

Section C: Referrals

	Force	Force %	SPLY	MSF Average	MSF Average %	National	National %
Number referrals received	13		9			2,855	
Number referrals completed	13		9			2,875	
Decision: Independent Investigation	3	23%	0			211	7%
Decision: Directed Investigation	0	0%	0			21	1%
Decision: Local Investigation	10	77%	6			1,791	62%
Decision: Return to Force	0	0%	3			820	29%
Decision: Invalid	0	0%	0			30	1%



The figures presented in this section include all referrals that the force makes to the IOPC (received), not just those arising from complaints.

When the IOPC receives a referral from the force, it reviews the information they have provided. The IOPC decides whether the matter requires an investigation, and the type of investigation.

Referrals may have been completed in a different period to when they were received.

Where a referral is made by the force on a mandatory basis but does not meet the mandatory referral criteria, the matter may not fall within the IOPC's remit to assess and will be determined invalid.

The sum of decisions may not match the number of referrals completed. This is because some matters referred may have come to the attention of the appropriate authority before 1 February 2020 and have investigation type decisions of either managed or supervised.

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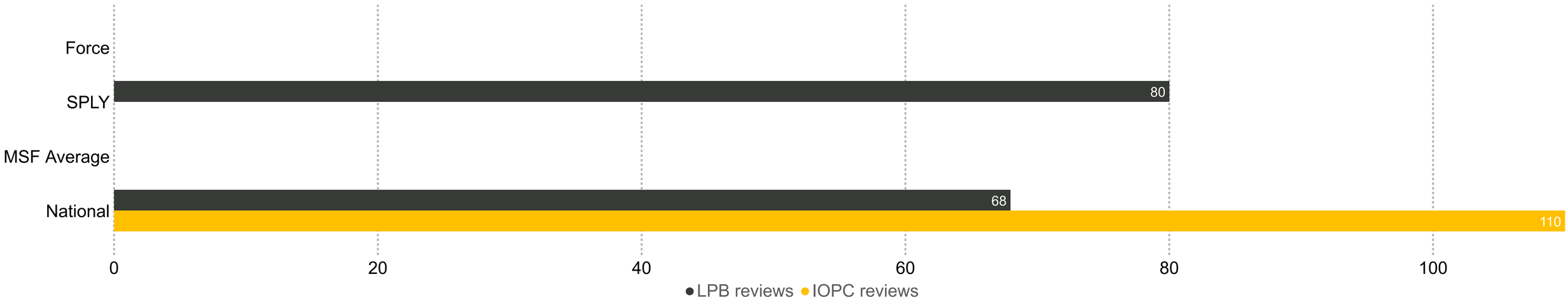
Section D1: Reviews received

.	Complaint cases finalised under Schedule 3	Reviews received	Reviews received as proportion of complaint cases finalised under Schedule 3	Number LPB reviews received - investigation	Number LPB reviews received - non-investigation	Number IOPC reviews received - investigation	Number IOPC reviews received - non-investigation
Force	46	4	9 %	0	2	1	1
SPLY	65	6	9 %	0	4	1	1
MSF Average							
National	14,796	3,137	21 %	124	2,025	396	592

Section D2: Reviews timeliness

	Force	SPLY	MSF Average	National
Average number of working days to complete Local Policing Body reviews	0	80		68
Average number of working days to complete IOPC reviews	0	0		110



Where a complaint has been recorded under Schedule 3 to the *Police Reform Act 2002*, the complainant has a right to apply for a review. A person can apply for review if they are unhappy with the way their complaint was handled, or with the outcome. This applies whether the complaint has been investigated by the appropriate authority or handled otherwise than by investigation (non-investigation). The application for a review will be considered either by the local policing body or the IOPC; the relevant review body depends on the circumstances of the complaint.

This section presents information about applications for review handled by both local policing bodies and the IOPC.

Information about the right of review and who is the relevant review body is available in chapter 18 of the IOPC's Statutory Guidance on the police complaints system (February 2020).

Reviews with 'invalid dates' have been removed from reviews timeliness. Please refer to the performance framework counting rules and calculations on the IOPC website for an explanation of invalid dates.

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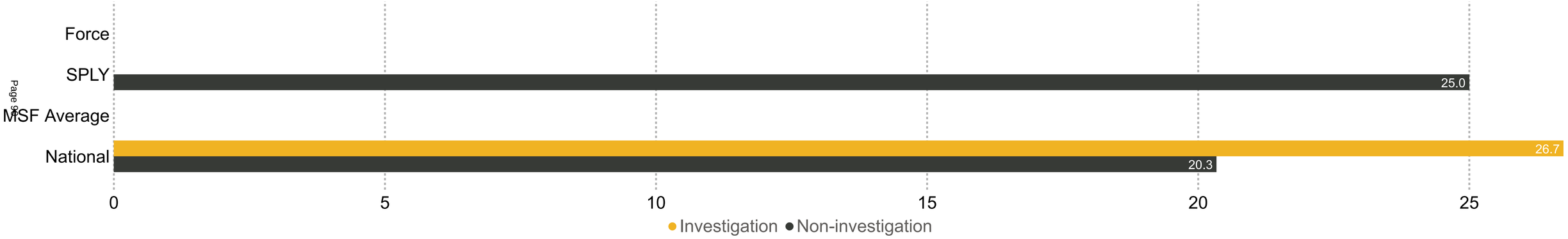
Section D3: Decisions on reviews

This section presents information about the decisions made on reviews including the proportion of reviews that found the outcome of the complaint was not reasonable and proportionate, those which resulted in a recommendation and, if necessary, a direction to the appropriate authority in respect of any person serving with the police. Please note: Numbers are not available for the MSF Average - % only

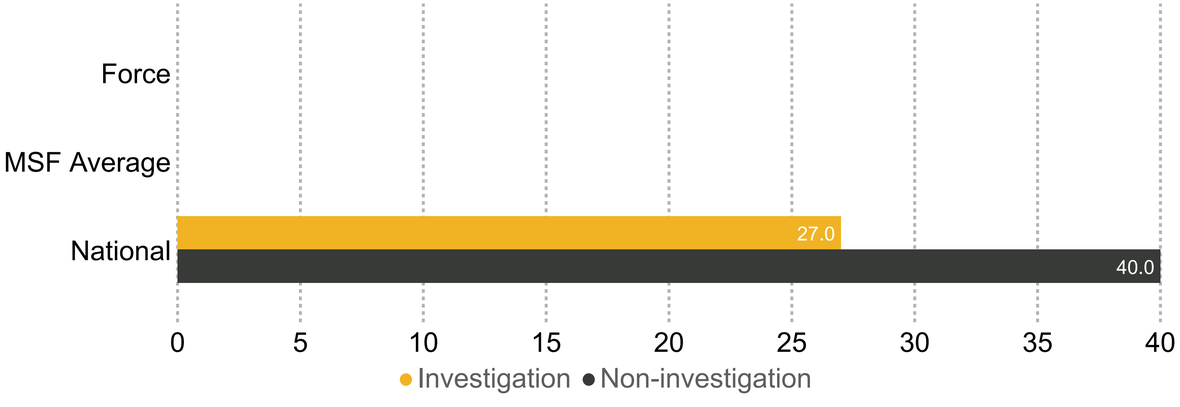
LPB reviews found not reasonable and proportionate

.	Investigation			Non-investigation		
.	Valid completed reviews	Found not reasonable and proportionate	% found not reasonable and proportionate	Valid completed reviews	Found not reasonable and proportionate	% found not reasonable and proportionate
Force	0		0	0		0
SPLY	0		0	4	1	25
MSF Average						
National	187	50	27	2,252	458	20



% IOPC reviews found outcome not reasonable and proportionate

	Force	SPLY	MSF Average	National
Investigation	0	0		27
Non-investigation	0	0		40



We are not currently able to add IOPC review figures to the bulletin, this will be a future development. Figures are available on request. Caution should be used as the numbers may be low.

% LPB reviews resulting in...

	Force	SPLY	MSF Average	National
Recommendation made	0	100		91
.				

% IOPC reviews resulting in...

	Force	SPLY	MSF Average	National
Recommendation made	0	0		4
Direction	0	0		22

Calculation notes:

LPB reviews recommendation - % of reviews **found not reasonable and proportionate only** that resulted in a recommendation for action

IOPC reviews recommendation - % of **total valid Investigation reviews completed** tha resulted in a recommendation (the IOPC do not make recommendations on non-investigation reviews)

IOPC reviews direction - % of **total valid reviews completed** that resulted in a direction (both review types)

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Section E1.1: Allegation actions - on complaint cases handled outside of Schedule 3

.	Force		SPLY		MSF Average		National	
Actions following outside of Schedule 3 complaint cases	No.	%	No.	%	No.	%	No.	%
Organisational learning	0	0 %	0	0 %			83	0 %
Individual learning	0	0 %	0	0 %			147	1 %
Policy review	0	0 %	0	0 %			17	0 %
Goodwill gesture	0	0 %	0	0 %			58	0 %
Apology	4	2 %	8	4 %			2274	9 %
Debrief	0	0 %	0	0 %			243	1 %
Explanation	153	95 %	128	72 %			13384	54 %
No further action	2	1 %	36	20 %			5941	24 %
Informal action by a line manager	0	0 %	0	0 %			17	0 %
Learning from Reflection	0	0 %	3	2 %			309	1 %
Other action	2	1 %	4	2 %			1809	7 %

This section presents information about what happened as a result of the allegation (action). Actions are captured at allegation level and multiple actions can be selected, where appropriate, on single allegation. The figures shown in this section are based on allegations on finalised complaint cases that resulted in the corresponding action. As more than one action can be selected for a single allegation, the sum of all percentages will not equal 100%.

The actions available once an allegation is finalised depend on how the complaint case has been handled. Please refer to our Guidance on capturing data about police complaints for details of actions available.

Please note: not all of the available actions arising from the complaint handling are shown. The actions presented in this section are those that focus on putting an issue right and preventing it from happening again by encouraging those involved to reflect on their actions and learn.

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Section E1.2: Allegation actions - on complaint cases handled under Schedule 3

This section presents information about what happened as a result of the allegation (action). Actions are captured at allegation level and multiple actions can be selected, where appropriate, on single allegation. The figures shown in this section are based on allegations on finalised complaint cases that resulted in the corresponding action. As more than one action can be selected for a single allegation, the sum of all percentages will not equal 100%.

The actions available once an allegation is finalised depend on how the complaint case has been handled. Please refer to our Guidance on capturing data about police complaints for details of actions available. Please note: not all of the available actions arising from the complaint handling are shown. The actions presented in this section are those that focus on putting an issue right and preventing it from happening again by encouraging those involved to reflect on their actions and learn.

All complaint cases handled under Schedule 3

.	Force		SPLY		MSF Average		National	
Complaint cases resulting in below actions	No.	%	No.	%	No.	%	No.	%
Organisational learning	0	0 %	1	2 %			280	2 %
Individual learning	0	0 %	0	0 %			1	0 %
Apology	0	0 %	3	5 %			884	6 %
Debrief	0	0 %	0	0 %			128	1 %
Explanation	38	83 %	42	65 %			6106	41 %
Unsatisfactory Performance Procedure (UPP)	0	0 %	0	0 %			12	0 %
No further action	6	13 %	14	22 %			6447	44 %
Other action	0	0 %	0	0 %			286	2 %
Informal action by a line manager	0	0 %	0	0 %			1	0 %
Learning from Reflection	1	2 %	3	5 %			1687	11 %
Referral to RPRP	2	4 %	3	5 %			471	3 %

Misconduct, UPP and RPRP on complaints investigated under Schedule 3 (subject to Special Procedures)

Complaint cases handled under Schedule 3 that are investigated **and** subject to Special Procedures can result in misconduct proceedings

.	Force		SPLY		MSF Average		National	
Complaint cases resulting in below actions	No.	%	No.	%	No.	%	No.	%
Misconduct proceedings	1	50 %	0	0 %			47	23 %
Unsatisfactory Performance Procedure (UPP)	0	0 %	0	0 %			3	1 %
Other actions following a case to answer decision	0	0 %	0	0 %			13	6 %
Referral to RPRP	0	0 %	0	0 %			54	26 %

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Notes

Data sources

- Data in this bulletin is taken from XML data submissions made by forces to the IOPC every quarter except for IOPC performance data which is taken from the IOPC case management system.
- Police force employee numbers are taken from the latest police workforce England and Wales statistics published by the Home Office.
- The most similar force (MSF) groups used for the calculation of the MSF averages in this bulletin are those determined by HMICFRS. Please note that the British Transport Police and City of London Police do not have an MSF group. A list of the MSF groups is available on the IOPC website.
- Figures for City of London include complaint cases logged in relation to 'Action Fraud'. Action Fraud is the UK's national reporting centre for fraud and cybercrime. The service is run by the City of London Police, which is the national policing lead for economic crime.

Performance Framework counting rules and calculation

- The counting rules and calculations used to produce the data shown in this bulletin can be found on the IOPC website.
- Average times are presented in working days and do not include weekends or bank holidays.
- Some percentages may add up to more or less than 100% due to rounding.
- Complaint cases and allegations with invalid start/end dates have been removed from average time calculations. Therefore, the numbers of complaint cases and allegations used in the average time calculations may be lower than the total number of complaint cases and allegations logged or finalised.

Data constraints

- The data is sourced from live case management systems and provides a snapshot of information as it was at that time. Therefore, there may be variances between the information in this bulletin and information reported at a later date.

Further Information

- A glossary providing a full list of definitions used in this bulletin, can be found on the IOPC website.

- Additional information about the recording of police complaints, including the definitions of the complaint categories, can be found in appendix A of the IOPC's Guidance on capturing data about police complaints.

- Information about how the police complaints system operates, who can complain and how reviews are dealt with can be found in the IOPC's Statutory Guidance on the police complaints system (February 2020).

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