



Professional Standards & Integrity (Police) Committee

Date: TUESDAY, 7 NOVEMBER 2023
Time: 11.00 am
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members: Michael Mitchell (Chair) Deputy James Thomson
Alderman Professor Emma Helen Fentimen
Edhem (Deputy Chairman) Jason Groves
Deborah Oliver Florence Keelson-Anfu
Nicholas Bensted-Smith Joanna Abeyie
Tijs Broeke Naresh Sonpar

Enquiries: Ben Dunleavy
Richard.Holt@cityoflondon.gov.uk

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Ian Thomas CBE
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 meeting held on 15 September 2023.

For Decision
(Pages 5 - 12)

4. **REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 13 - 14)

Priority area 1 - Vetting, conduct, integrity

5. **ACTION FRAUD STATISTICS – QUARTER 2 1 JULY 2023 - 30 SEPT 2023**

Report of the Commissioner.

For Discussion
(Pages 15 - 28)

6. **NOTIFIABLE ASSOCIATIONS - UPDATE**

Report of the Commissioner.

For Discussion
(Pages 29 - 36)

Priority area 2 - Equality and inclusion

7. **QUARTERLY EQUALITY AND INCLUSION UPDATE**

Report of the Commissioner.

For Discussion
(Pages 37 - 46)

8. **PROPOSED EQUITY, DIVERSITY & INCLUSION STRATEGY FOR THE CITY OF LONDON POLICE (2024-2027)**

Report of the Commissioner.

For Discussion
(Pages 47 - 78)

Priority area 3 - Use of powers

9. **INDEPENDENT ADVISORY & SCRUTINY- UPDATE ON NEW ARRANGEMENTS**

Report of the Commissioner.

For Discussion
(Pages 79 - 88)

10. **Q2 STOP AND SEARCH AND USE OF FORCE 2023-24**

Report of the Commissioner.

For Discussion
(Pages 89 - 96)

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

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

13. **EXCLUSION OF THE PUBLIC**

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

For Decision

14. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 15 September 2023.

For Decision
(Pages 97 - 100)

Priority area 1 - Vetting, conduct, integrity

15. PROFESSIONAL STANDARDS STATISTICS - QUARTER 2 - 1 JULY 2023 - 30 SEPT 2023

Report of the Commissioner.

For Discussion
(Pages 101 - 128)

16. MISCONDUCT CASES- DIP SAMPLES

Report of the Commissioner.

For Discussion
(Pages 129 - 140)

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

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

Professional Standards & Integrity (Police) Committee Friday, 15 September 2023

Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Friday, 15 September 2023 at 11.00 am.

Present:

Michael Mitchell (Chair)
Deputy James Thomson
Deborah Oliver
Nicholas Bensted-Smith

In attendance virtually:

Jason Groves

Officers:

Raquel Pinto	- Town Clerk's Department
Richard Riley	- Police Authority Director
Charles Smart	- Police Authority Team
Paul Betts	- Assistant Commissioner. City of London Police
Kate MacLeod	- Det. Supt City of London Police
Sanjay Anderson	- T/DCS City of London Police
Claire Cresswell	- Det. Supt City of London Police
Amanda Lowe	- DCI City of London Police
Neal Donohoe	- T/Supt City of London Police
Hayley Williams	- City of London Police

1. APOLOGIES

Apologies were received from Aldermen Professor Emma Edhem, and Ms Helen Fentimen.

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

There were no declarations.

3. MINUTES

RESOLVED- That the public minutes of the Professional Standards & Integrity (Police) Committee meeting on held on 9th May 2023 be approved as an accurate record.

4. PUBLIC OUTSTANDING REFERENCES

The Committee received a joint report of the Commissioner and Town Clerk on the public outstanding actions from the previous meeting of the Committee.

The Chairman of the Police Authority Board asked for a date against item six. Officers noted this and this would be provided at the next meeting.

RESOLVED- That the report be noted.

5. **Q1 Action Fraud complaints statistics 2023-2024**

The Committee received a report of the Commissioner on Action Fraud complaints and dissatisfaction data for the first quarter of 2023/24 (April - June).

A Member observed that although it was positive to see a general drop on the quarter-on-quarter data, looking at data on page 18, directionally it was not clear it was an improvement. Officers explained that they had seen an increase since regulations had changed. One of the new requirements was to record every impression of dissatisfaction, whereas prior to 2020 this was not a requirement. There had been some system issues which explained the lag in increasing numbers, but the overall percentage of complaints remained low.

The Chair enquired as to whether Action Fraud should be heard at this Committee or whether there were more appropriate committees this should be taken into. The Assistant Commissioner shared this view and believed that this would sit more appropriately under economic crime and would support its move. A Member pointed out that one of its aspects was reporting on the processes regarding complaining, as well as how these complaints were managed in the past, which was appropriate for this Committee. However, they shared the view that the Economic and Cyber Crime Committee should have overview. Members agreed this should be a conversation that was to be taken away and discussed further with officers, as there were concerns that this would disaggregate complaints. This Committee looked at complaints against City Police and believed that taking this item away altogether would be wrong. However, Economic and Cyber Crime Committee looked at Action Fraud performance which relates back to poor handling and how complaints were responded to, which members agreed may risk duplication of work. The Committee agreed that officers would take this issue away and look at what this Committee should be receiving with regards to this topic, and report back at a later stage.

The Chair also wanted to note that the quality of reporting was improving consistently.

RESOLVED- That the report be noted.

6. **COMMUNICATING MISCONDUCT**

The Committee received a report of the Commissioner on the City of London Police protocol for communicating misconduct information publicly.

Officers introduced the report which noted the protocol and gave a clear understanding of the process to stakeholders (reaching as far as journalists), understand of how the force communicated misconduct, like upcoming hearings and outcomes. This was done in conjunction with Professional Standards colleagues and was worked closely alongside the regulations. This

also further cemented the protocol surrounding upcoming misconduct cases which were published a minimum of five working days ahead of the hearing date.

In response to a member's question regarding proactively publicising an upcoming hearing, it was noted that all RSS feeds which publish this information goes to journalists. It was also noted that when the upcoming hearings were published, journalists called ahead for comments. On the relationship with London media, they receive regular contact and were aware of this protocol. One of the reasons this was produced was due to criticism the City Police received last year. This protocol was produced to combat misunderstanding, and relationships have since improved as well as understanding.

The Chair enquired regarding how public engagement was measured with regards to misconduct cases, and whether this has been tested either publicly or internally. Furthermore, the Chair also enquired how the City Police compare to other forces with regards to how they communicate. The Committee noted that there was a drive from the National Police Chief Council looking at this issue and this was a key element, which was to ensure policy was fit for purpose and used consistently. There was a varying level of information provided by different forces, and this work was a part of a national coordinating group.

With regards to engagement, internally, the Intranet site was clear on engagement levels. There were reports that were sent around consistently when communicating hearings. The interaction of views and engagement with comments was high and presented a clear picture. On external engagement, they had not yet tested this element on the website. The emphasis was more on media coverage and how this was reported and the level of interest from journalists. It was enquired if there were future plans to engage with the public on this matter and officers agreed to take this point away.

RESOLVED- That the report be noted.

7. QUARTERLY EQUALITY AND INCLUSION UPDATE

The Committee received a report of the Commissioner on the Equality & Inclusion(E&I) activity within the Force from a national and local perspective since the last report to the Committee in May 2023.

Members commended officers on this report. They had a number of queries regarding how attendance at internal events was measured and tracked (including officers and staff), when the City Police were likely to get accreditation for the White Ribbon and how the City could assist with unlocking this. Members also wanted to know how success was measured in general, what could be done as a follow up event post Steven Lawrence's Day and finally how they could raise more awareness amongst residents and city workers, on these issues and on operations. The Chair also wanted to get

an understanding on what were the top three challenges officers were facing in this remit and how these were shaping their strategies going forward.

In response to these Member's questions, it was noted that:

- Evaluation was important; however, they were not as good promoting upcoming sessions as well as they should be, and this was something they would be looking into, alongside officers from the Corporation on how to better this.
- The inclusivity programme produced an evaluation strategy, in which officers write up what they have done and note what behaviours changed as a result of attending these sessions. There was cross-departmental work ongoing as to see how this data could be captured.
- On the White Ribbon accreditation, there was ongoing work on this, but the Police were considering progressing their own application separately from the City of London Corporation. They would follow up with officers separately to discuss next steps.
- On engaging with residents and city workers, this was a key area that needed to be tapped into, and they had a new action plan with a whole pillar dedicated to this.
- On the top three challenges the Committee heard from various teams the following:
 - These were around the rationalising of various activities whilst trying to deliver against them (including operational delivery). The key challenges and ambitions were around engagement across partners and across CoLP to ensure things were delivered and to avoid duplication.
 - Another challenge was around dynamic demand, as the nature of their portfolio needed to answer to current issues and resources need to be moved and allocated accordingly. The team were equipping themselves to be proactive, and an update on this would come to the Committee in November as part of the next quarter update.
 - On the engagement and evaluation piece, evaluation needed to be evolved and linked with other colleagues across the police force. Nevertheless, the ambition of the City Police is to be the most inclusive police orientated force in the country. They want to see the force deliver at pace as well as distinguish itself as the place to work.

Members enquired if there was a budget cut, what were the three priority pieces that would continue to be worked on. Officers explained that conduct was one as there was good ongoing work with professional standards with the race action plan, which was looking at the disproportionality of outcomes for black and ethnic minority officers, as well as supporting inclusion. Another piece would be the national workshops for police race action plan and Violence against Women and Girls (VAWG), which reputationally were being recognised nationally. Another area was around the community, and how they were engaged as well as understanding people's journeys, as the Steven Lawrence day highlighted the impact of this. Lastly the relationship with the internal support networks as they were the route into the workforce, and having this connection and free flowing conversation was important in driving forward.

The Chair thanked all for the report and hoped to see this continue to come to the committee quarterly.

RESOLVED- That the report be noted.

8. Q1 STOP AND SEARCH AND USE OF FORCE

The Committee received a report of the Commissioner on the Q1 Stop and Search and Use of Force 2023-24.

The Assistant Commissioner introduced the reported and noted that the significant impact stop and search had on communities. There was an element which was being internally questioned as well as ongoing work on the disproportionality of stop and search. There was awareness that the likelihood of black members of communities being stopped and search in the City as lower, however, they were still two times more likely to be stopped and searched. The numbers of Asian individuals being stopped and searched had also dropped.

Members wanted to express their thanks to the independent Advisory and Scrutiny Group (IASG) as they understood they were under-resourced. Members wanted assurances regarding the dip sampling and that this was done appropriately, and further enquired as to whether the Independent Advisory and Scrutiny Group (IASG) sampling was done in the same way. Officers explained that there had been an internal stop and search group meeting which reviewed how the dip samples were done. On the dip samples, the protocol was that they would randomly dip into reports and review the footage from the body worn video and identify any learning. This included how the search was conducted and then feedback was given to officer. The Chief Superintendent and Inspectors would then investigate the samples to make sure there was a second layer of governance. The IASG looked at a separate piece which they review and feedback on. Alongside this the University of East London were collaborating with the City of London Police by looking into their samples and providing feedback. Members enquired regarding the role of the youth IASG and how they differed from IASG and wanted clarity as to how the force used both groups. The Committee was advised that a report regarding this was due to come to the next meeting. Members also asked that a graph was introduced in the reporting so they could track progress over time and see scores, as this would be helpful in seeing where improvements could be made.

RESOLVED- That the report be noted.

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

Members enquired with regards to agenda item four regarding Notifiable Associations Policy, as to whether police staff and officers were covered by the policy. The Committee noted that a separate policy covered police civilian

staff as well as the Corporation staff, which officers would cover in their report to the next Committee.

It was noted by the Chair of PAB that he was looking to co-opt another Member from Court of Common Council onto the Professional Standards and Integrity Committee.

10. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT

There was no other business.

11. EXCLUSION OF THE PUBLIC

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

The Committee adjourned for five minutes.

12. NON-PUBLIC MINUTES

RESOLVED- That the non- public minutes of the Professional Standards & Integrity (Police) Committee meeting on held on 9th May 2023 be approved as an accurate record.

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

The Committee received a report of the Commissioner on the HMICFRS Inspections Update on vetting, misconduct, and misogyny in the police and COLP Counter Corruption and vetting inspection.

RESOLVED- That the report be noted.

14. Q1 PSD STATISTICS 2023-24

The Committee received a report of the Commissioner on the Professional Standards Statistics Quarter 1, 1st April 2023 – 30th June 2023.

RESOLVED- That the report be noted.

15. MISCONDUCT CASES -DIP SAMPLES

The Committee received a report of the Commissioner on samples of misconduct cases for scrutiny by the Professional Standards and Integrity Committee Report of the Commissioner.

RESOLVED- That the report be noted.

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

Members enquired if there was a policy on dealing with trans individuals as victims and perpetrators and whether there were statistics on crime numbers regarding this group.

17. 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.

The meeting ended at 12:35pm

Chair

**Contact Officer: Raquel Pinto
Raquel.Pinto@cityoflondon.gov.uk**

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PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

PUBLIC OUTSTANDING REFERENCES

02/2023/P	Item 6- VIOLENCE AGAINST WOMEN AND GIRLS UPDATE	The Chair requested that Officers report back to the Committee and the Police Authority Board with a comparative analysis with other police forces on the work completed to combat violence against women and girls.	Commissioner	. It is not really possible to do a comparative analysis with other forces on this as we do not have access to other force’s data. However, feedback at national conferences and working groups on work CoLP is doing around Violence against women and girls is positive, and Op Reframe is seen as national best practice. Performance on Violence Against Women and Girls is reported to the SPPC as part of the Performance against policing plan measures report and updates on activity are provided as part of regular reporting on E&I to this Committee.
03/2023/P	Item 7- NOTIFIABLE ASSOCIATIONS POLICY REVIEW	The Committee requested that Officers look at appropriate future planning in area of Notifiable Associations Policy to assess how best to format this evidence based training and mitigate any risks	Commissioner	Complete- a report is on the agenda.
05/2023/P	15th September Item 8- Q1 Stop and Search and Use of Force	Members asked for Stop and Search trend data to be highlighted in future reports in order to make it easier to track progress.	Commissioner	In progress- trends are currently explained in the narrative of the report. However, CoLP is working with the PA Team on refining the format for reporting on Stop and

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				Search and Use of Force going forward, so this will be explored further as part of that work.
06/2023/P	15th September Item 16- NP Questions	Members asked the City of London Police to provide a detailed note on policy around how Trans victims and perpetrators were managed. The CoLP provided initial details which they would expand upon in an updated note	Commissioner	Complete- This was circulated by Polly Dunn to Members of PSIC on the 20 th October at 1719.

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Committee(s): Professional Standards and Integrity	Dated: 07112023
Subject: Action Fraud Statistics – Quarter 2 – 1 st July 2023 – 30 th Sept 2023	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 Discussion
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 second quarter of 2023/24 (July - Sept).

Data	<p>Following changes to the Misconduct Regulations there are four full data set years for comparative data. All logged complaints include all dissatisfaction.</p> <p>Action Fraud data is referred to in the overall figures reported in the main PSI report to provide an overview of the Professional Standards Directorate workload, however the details have been removed and reported separately within this document.</p>
Action Fraud complaints	<p>Action Fraud – a National Service – continues to generate a greater volume of complaints than the City of London Police. This is a very small proportion against the volume of Action Fraud incident reports recorded.</p> <p>Complaint data has seen the number of complaint cases logged to a total of 110 in Q2. This is an increase against the previous quarter (15%) and below average against the previous 5 quarters.</p> <p>The complaints are broken down as 1 logged under Schedule 3, and 109 not within Schedule 3.</p>

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	<p>Changes to the Police Complaint & Conduct regulations in 2020 placed a greater emphasis on handling complaints in a <i>reasonable and proportionate</i> way and in a more customer focused manner.</p> <p>Reports of dissatisfaction are logged and assessed in line with Schedule 3 of the Police Reform Act 2002 and IOPC Statutory Guidance 2020 and this assessment can result in one of a number of outcomes;</p> <ul style="list-style-type: none"> • 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 <i>reasonable and proportionate</i> manner to try to achieve an earlier resolution to the complainant’s satisfaction, while others will be investigated formally. At the end of this process if the complainant remains dissatisfied with the outcome of the complaint they have a right of review by either the Local Policing Body or the IOPC, depending on the seriousness of the allegation. • 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. <p>The volume of logged complaints is extremely low compared to the number of fraud reports to Action Fraud. In Q2 of the 2023/24 Financial Year Action Fraud recorded 147,955 reports on the National Fraud Database (98,427 crime reports and 49,528 Information reports). The complaint figures (total) represent 0.07% of the total number of Action Fraud reports recorded in Q2.</p>
<p>Nature of Allegations</p>	<p>Of the 42 allegations recorded during Q2 2023/24 the highest number was in the category of, A1 – Police action following contact (35) followed by A3 – Information (5) and A4 - General level of Service (2). Reasons for complaint mostly relate to customer expectation of Action Fraud, with either the lack of contact or investigation cited.</p>

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Finalised Allegations	<p>The total number of allegations finalised during Q2 is 46 compared to 47 in the previous quarter.</p> <p>Cases often contain more than one allegation; the number of cases finalised in Q2 is 39. 34 outside of Schedule 3 and 5 within Schedule 3. Some of these cases will have allegations finalised in a previous quarter.</p>
IOPC Reports	<p>The IOPC quarterly bulletin has been published, Q1 2023/24 data is the most recent publication¹ The IOPC are producing separate complaint bulletins to reflect AF and CoLP data to be used internally. A combined statistical bulletin will be published externally on their website. A CoLP commentary sheet has been published alongside the IOPC bulletin with an explanation regarding the combined statistics.</p>
Appeals	<p>None received.</p>
IOPC investigations	<p>There are currently no live IOPC investigations.</p>

¹ At the time of this document being written in advance of the PSIC meeting.

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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

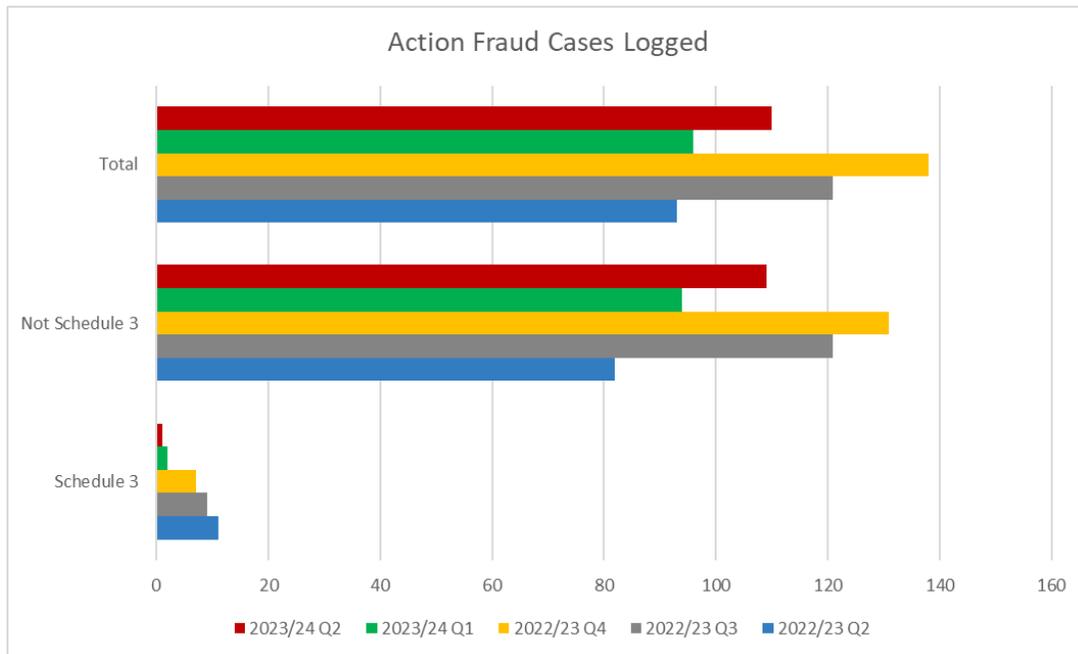
Part C – IOPC

Part D – Learning

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Part A – Complaints & Allegations

Table 1 - Quarterly Comparisons for Action Fraud Complaint Cases



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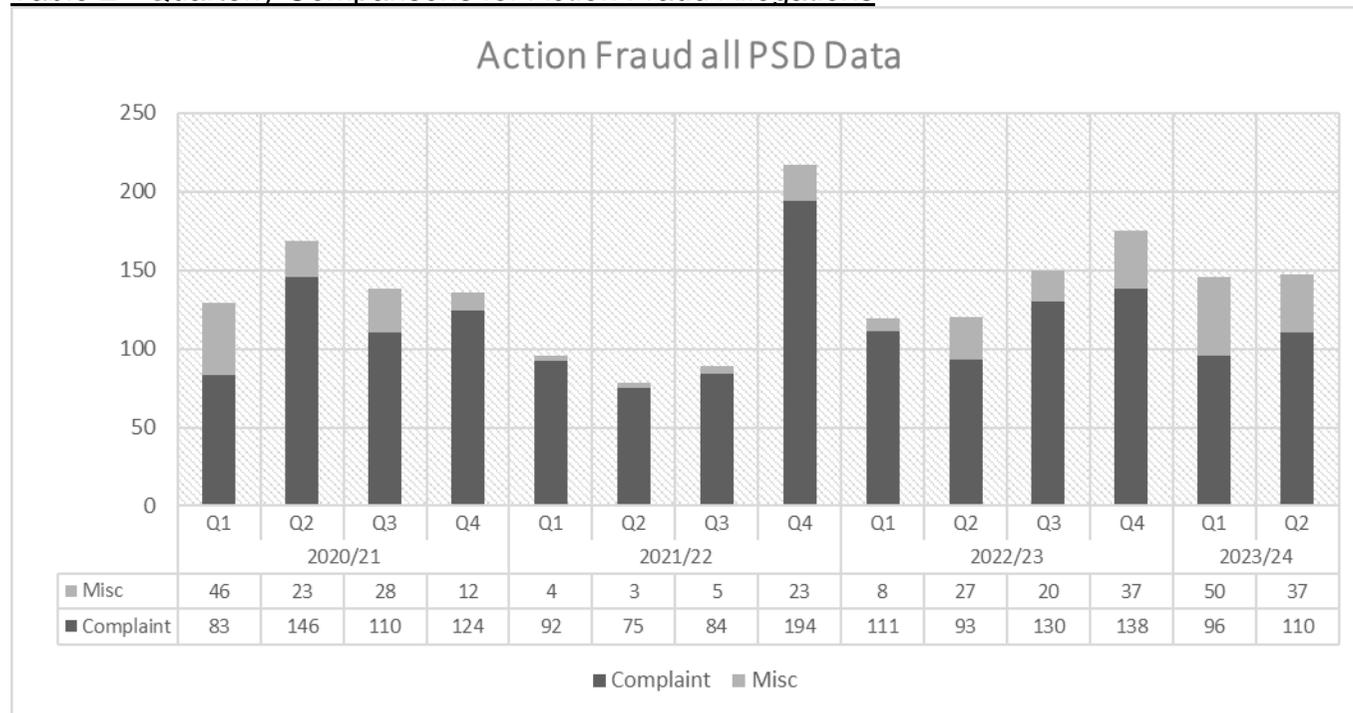
In Q2 of the 2023/24 Financial Year Action Fraud recorded **147,955** reports on the National Fraud Database (**98,427** crime reports and **49,528** Information reports).

The complaint figures (total) represent 0.07% of the total number of Action Fraud reports recorded in Q2.

- The number of Action Fraud complaints logged in Q2 2023/24 is 110 which is an increase of 14 (15%) from the previous quarter.
- 109 of these complaints fell outside of Schedule 3, 1 was within Schedule 3.
- Recording standards require all customer dissatisfaction to be logged and the volume of reporting. At the beginning of 2022 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.
- 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.

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Table 2 - Quarterly Comparisons for Action Fraud Allegations



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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. A separate AF IOPC bulletin is published for internal use only.

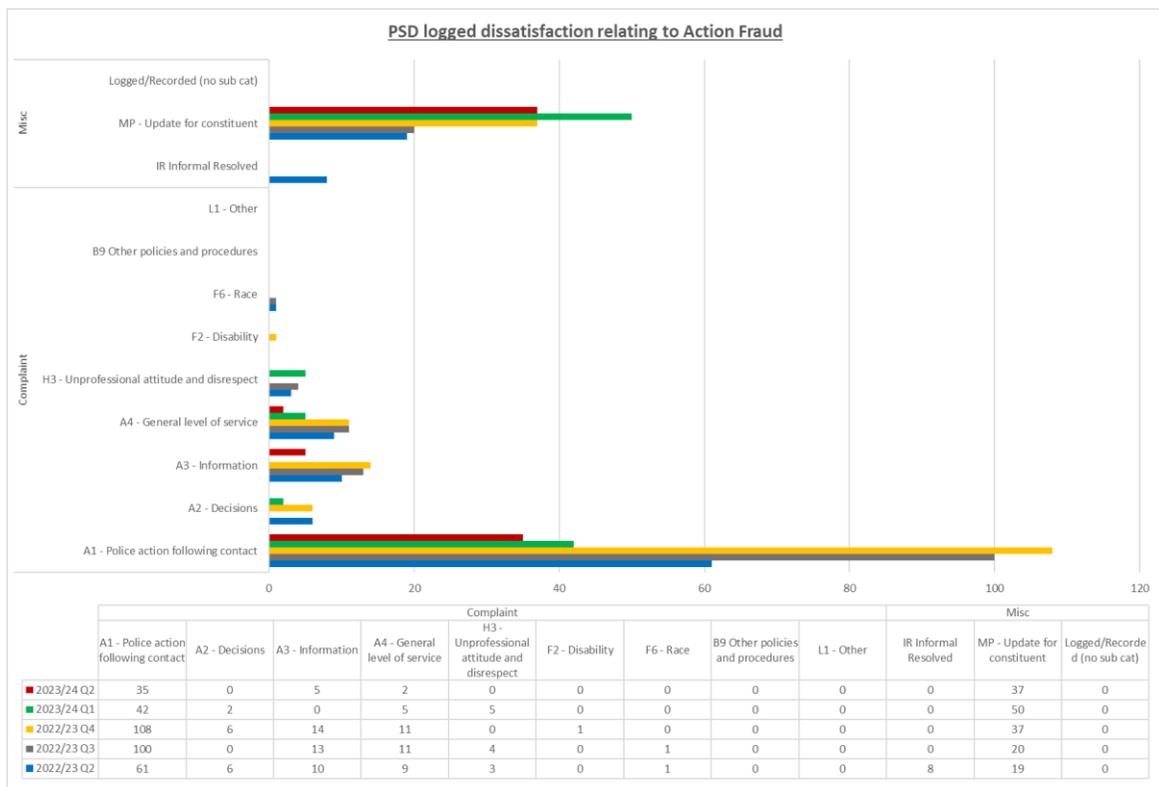
Due to these changes to recording standards, at the beginning of 2022 a decision was taken to record all Action Fraud complaints received by both PSD and those received directly by the Action Fraud team. This is to ensure an accurate record is kept of the demand being dealt with and also enables relevant 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 2022/23). The upward trend in AF complaints is likely to continue or to show a plateauing over the forthcoming quarters. Positive changes to the AF website and overall communication strategy surrounding the AF service will assist in maintaining low complaints (compared to the volume of crime reports) of this national service. Q2 2023/24 compared against previous quarters is just below average against the previous 5 quarters. This quarter has received a further 37 reports from M.P's on behalf of constituents relating to AF.

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.

PSD complaint managers who deal with the Action Fraud complaints are involved in the new FCCRAS project as 'Change Agents', meeting with PwC on a regular basis to ensure that customer expectations are met. The overarching goal is to improve information and communication with AF victims.

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



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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.

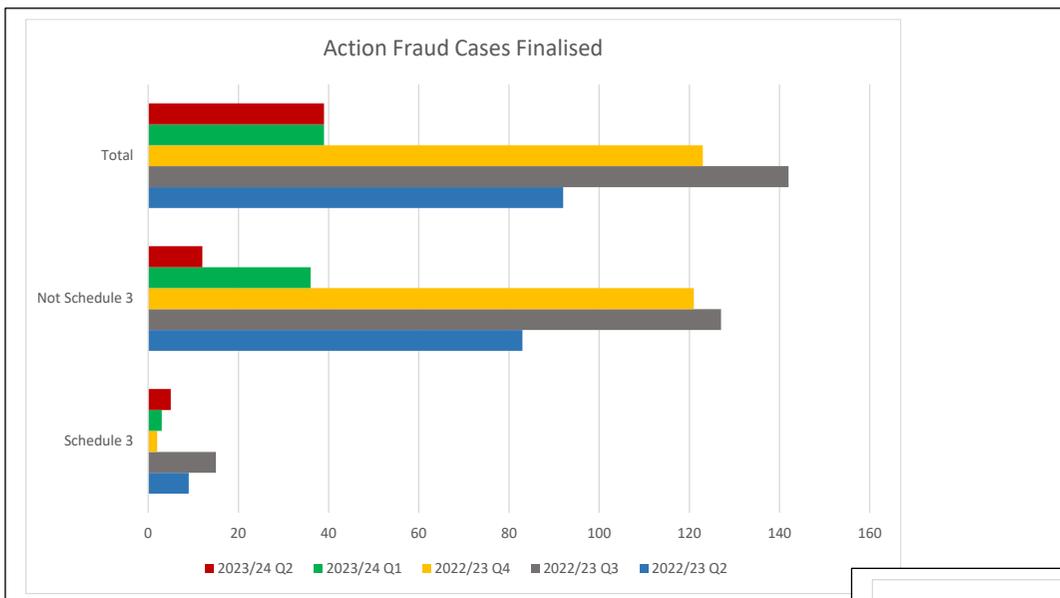
- Of the 42 allegations recorded during Q2 2023/24, Police action following contact was the highest category with 35, followed by Information (5) and General level of service (2). The graph visualises the trend of 'Police action following contact' over the rolling yearly data being the constantly highest 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. However Q2 continues to see further reporting by MP's which may have been influenced by some AF media attention.

- The IOPC now publish new quarterly bulletins, most recent being Q1 data*, where AF data is displayed in a separate bulletin for internal use only. This cannot be compared against any other National data, as being a unique service. However this is helpful to separate CoLP data from the AF data. The IOPC will continue to publish the amalgamated data quarterly on their website.

*at time of writing

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Table 3 – Finalised – Cases and Allegations – Q2



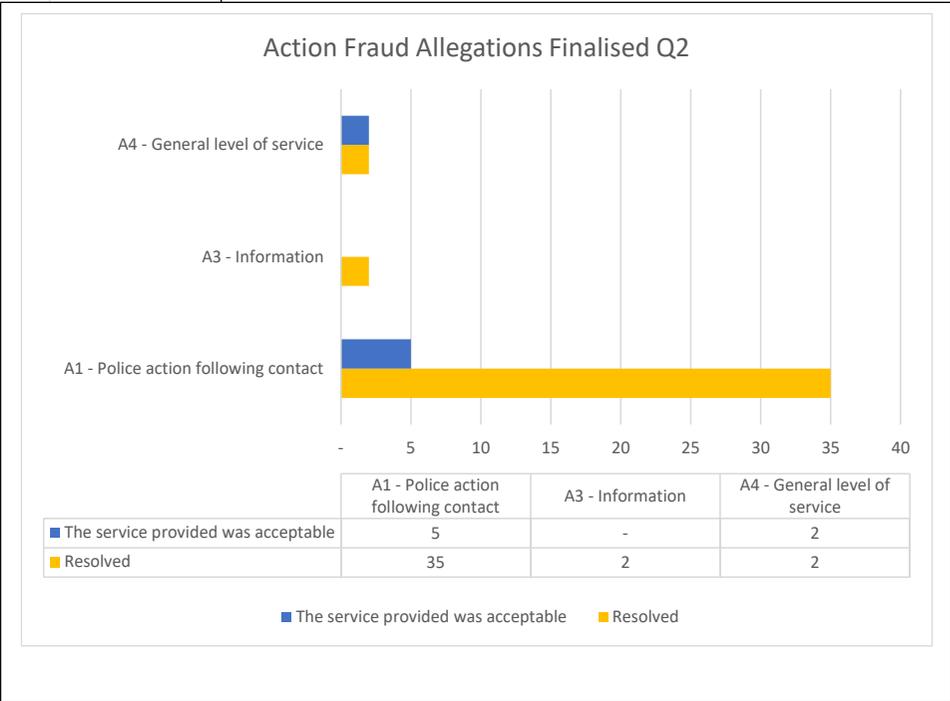
AF Finalised Cases: -

- 39 Action Fraud cases have been finalised during the Q2 2023/24.
- 34 fell outside of Schedule 3. 5 fell within Schedule 3.
- The number of finalisations of cases in Q2 are exactly the same number as the previous quarter.
- Quarters three and four 2022/23 were logging a backlog from the Action Fraud sugar service.
- Q1 2023/24 has seen staff changes within PSD managing AF complaint data.

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AF Finalised Allegations: -

- 46 allegations have been finalised in Q2 2023/24.
- No outcomes were found that the Service provided was not acceptable.
- 39 (85%) allegations were Resolved. 7 allegations Service was found to be acceptable.
- Some allegations have been finalised from cases outside of this quarterly period.
- All allegations were finalised within 30 days.



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Part B –Appeals

None

Part C - IOPC

No cases been brought to the attention of IOPC

Part D –Learning**Action Fraud Complaints**

- PSD complaint managers who deal with the Action Fraud complaints are involved in the new FCCRAS project as 'Change Agents', meeting with PwC (who are implementing the new system) on a regular basis to ensure that customer expectations are met. The overarching goal is to improve information and wording on the AF website, plus any correspondence that is sent to victims, in order to increase awareness and understanding, and consequently reduce complaints. For example, one of the standard generated AF letters currently sent to victims, refers to 'no viable lines of enquiry', which receives a lot of complaints, as the victims believe they have provided numerous lines of enquiry for investigation. Better wording and explanations should improve communication as to why their AF report was not sent to a police force for investigation.
- 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.

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Annex A: glossary of terms

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

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

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

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

admissible evidence of that conduct in criminal proceedings, or

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

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

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

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

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

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

Complaint recording

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

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

Reports of dissatisfaction are logged and assessed in line with Schedule 3 of the Police Reform Act 2002 and IOPC Statutory Guidance 2020 and this assessment can result in one of a number of outcomes;

Non-Schedule 3 or early service recovery. PSD will make early contact with the complainant to understand their concerns and their dissatisfaction and, where the nature of their dissatisfaction allows, will try to resolve it to their satisfaction. This avoids a more lengthy process of investigation and can provide a complainant with an early resolution, explanation or other satisfactory outcome. If at the end of this process, it cannot be resolved it may be dealt with as a formal complaint within Schedule 3.

Schedule 3 Recorded – IOPC Statutory Guidance stipulates where complaints must be recorded and those that must be investigated; these include the more serious matters. Complaints which do not require an investigation will be handled in a *reasonable and proportionate* manner to try to achieve an earlier resolution to the complainant's satisfaction, while others will be investigated formally. At the end of this process if the complainant remains dissatisfied with the outcome of the complaint they have a right of review by either the Local Policing Body or the IOPC, depending on the seriousness of the allegation.

Referral to Independent Office for Police Conduct – some complaints may be referred to the IOPC and they may decide to independently investigate or oversee a police investigation. The IOPC also monitor our complaints system.

Investigations:

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

Investigation outcomes:

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

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

Reflective Practice Review Process:

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

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

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

Misconduct: A breach of the Standards of Professional Behaviour

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

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

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

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

Police Terminology

AA: Appropriate Authority

ANPR: Automatic Number Plate Recognition

ATOC: (Association of Train Operating Companies) agreements.

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

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

BWV : Body Worn Video

CAD: Computer Aided Dispatch

CCJ: County Court Judgement

DPS: Directorate Professional Standards (Metropolitan Police Service)

NOT PROTECTIVELY MARKED

DSI: Death or Serious Injury

TfL: Transport for London

ECD: Economic Crime Directorate

TPH: Taxi and Private Hire

FI: Financial Investigator

IC Codes:

IC1 – White – North European

HCP: Health Care Professionals

IC2 – Dark European

IOPC: Independent Office of Police Conduct

IC3 – Black

LP: Local Policing

IC4 – (South) Asian

MIT: Major Investigation Team

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

MPS: Metropolitan Police Service

IC6 – Arabic or North African

NFA: No Further Action

IC9 – Unknown

Niche: City of London Crime and Intelligence Database

NLF: National Lead Force

NUT: National Union of Teachers

PCO: Public Carriage Office

PHV: Private Hire Vehicle

PMS: Property Management System

PNC: Police National Computer

POCA: Proceeds of Crime Act

PRI: Practice Requiring Improvement

P&T: Professionalism and Trust

SAR: Subject Access Request

SAR: Suspicious Activity Report

SIO: Senior Investigating Officer

SOP: Standard Operating Procedure

SO: Specialist Operations

STOT: Safer Transport Operations Team

TFG: Tactical Firearms Group

Agenda Item 6

Committee(s): Professional Standards and Integrity Committee Police Authority Board	Dated: 7 th November 2023 22 nd November 2023
Subject: Notifiable Associations - 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 116-23	For Discussion
Report author: Head of Professionalism & Trust	

Summary

Members of both the Police Authority Board and the Professional Standards and Integrity Committee have at previous meetings voiced concerns regarding the potential risk of corruption associated with officers being members of private associations and groups, and how this risk is managed by CoLP.

The current position is that elected members of the City of London Corporation (CoL) are required to declare memberships of private groups and all CoL staff (including CoLP staff) are required to declare membership of private groups, but Police Officers are not currently required or regulated to make such declarations unless there is a conflict of interest or perceived conflict of interest under the Notifiable Associations Policy.

CoLP’s commitment to be the most inclusive police service is underpinned by improving trust and confidence in policing. Recognising and valuing individuality within its work force ensuring communities perception of the police is one of commitment and transparency. It is recognised that there is currently a disparity between City of London Police Officers and City of London Police Staff, but that in itself is not unusual as both groups operate under very different employment terms and conditions.

The Chief Officer Team discussed this matter at their meeting in September and as a result the below recommendations were agreed:

- CoLP to further review its Notifiable Associations Policy to ensure there is better clarity around what a conflict, or a perceived conflict of interest is, when a member of any private group and provides practical examples.
- CoLP Professional Standards Department is continuing to monitor any national progress on this issue in terms of Associated Professional

Practice (APP) and/or change in legislation and will review the position at that time.

- The Chief Officer Team agreed to voluntarily declare their membership of private groups e.g. Freemason's, Liveries, etc. This 'register' would be subject to annual update (unless the situation changes within that timeframe) and encompass police officer and police staff Chief Officer Team members. The PSD will hold the register and administer the process.

There is an update on the position with regard to the above recommendation in the report which also outlines some of the historical background, inquiries and recommendations on this issue to date. It also covers current provision in Policy, Regulations and the legal position as provided by the City Solicitor.

Recommendation(s)

Members are asked to note the report.

Main Report

Background

1. This report is as a result of discussions at both Police Authority Board, and Professional Standards and Integrity Committee where Members have considered the City of London Police (CoLP) position and the potential for registering of employees who are members of private groups/associations.
2. There has historically been a number of inquiries into cases that have looked into and made recommendations around this issue.

West Midlands Serious Crime Squad, Birmingham pub bombings and Stalker-Sampson enquiry

3. In 1997 The Home Affairs Committee looked at the role of the judiciary, police and CPS as a result of the West Midlands Serious Crime Squad, Birmingham pub bombings and Stalker-Sampson enquiry. There was a recommendation that there should be a register of membership that was publicly available. ¹
4. It was decided at that time that such a register couldn't be legislated and so a voluntary register was implemented, but due to no requirement to declare membership, had limited effectiveness.

¹ [House of Commons - Home Affairs - First Report \(parliament.uk\)](#)
[House of Commons - Home Affairs - Second Report \(parliament.uk\)](#)

Hillsborough Inquiry

5. Following the Hillsborough inquiry in 2016, a register was also recommended in relation to MPS officers.
6. This was refused by Sadiq Khan, in his role as Mayor of London which holds responsibility for Policing in the capital (outside of the City of London)². This decision was based on case law following an ECHR judgement in 2007 that a requirement to declare membership of Freemasonry is a violation of article 11 and article 14³.

Daniel Morgan Independent Panel

7. More recently, the Daniel Morgan Independent Panel (DMIP) published a report in 2021 which contained 24 recommendations. Recommendation 14 in relation to Freemason Membership was progressed by a National working group. The work was undertaken by the National Police Counter Corruption Advisory Group (NPCCAG) which examined all counter corruption intelligence relating to Freemasonry which resulted in corruption.
8. Recommendation 14 stated - "All police officers and police staff should be obliged to register in confidence with the Chief Officer of their police force, at either their point of recruitment to the police force or at any point subsequent to their recruitment, their membership of any organisation, including the Freemasons, which might call their impartiality into question or give rise to the perception of a conflict of loyalties".
9. Work by the NPCCAG to date has included:
 - Producing an evidence base as to the issue of Freemasonry in policing - Data collection circulated nationally and collated. This found only one case of corruption linked to Freemasonry nationally.
 - Legal research into the requirement to 'register' membership of Freemasonry and its compatibility with ECHR.
10. On the 22 June 2023 the Home Secretary presented to Parliament the Government response to the report of the DMIP. As referenced above, Recommendation 14 was that police officers (and staff) should declare their membership of any organisation, which might call into question their impartiality/loyalties.
11. The response of the Home Secretary is that there is a current lack of evidence to suggest that legislation is required. Instead, this will remain under review by the College of Policing as part of the updating of the counter corruption Authorised Professional Practice (APP).

² [Sadiq Khan refuses to make London police declare if they are Freemasons after Hillsborough questions raised | The Independent | The Independent](#)

³ [ECHR \(coe.int\)](#) p33

Current Position

12. The CoLP position currently is that there is a Notifiable Associations Policy, which has recently been reviewed (April 2023). This is with the objective of safeguarding the integrity of all officers and staff and ensuring that all understand their responsibilities under the existing policy with regards to relationships and memberships of any group.
13. The refreshed Notifiable Associations Policy has been re publicised through the CoLP quarterly professional standards newsletter and highlights the requirements of the refreshed policy.
14. However, Members were keen that CoLP specifically consider if there is anything further it could do with regards to registering membership of private groups.

Current provisions

15. Owing to the ECHR decision there is no legal framework to enforce the declaration of association with private groups. It would require new legislation.
16. Additionally, to make officers be 'obliged to register' goes beyond that which is in place currently within Police Regulations, Standards of Professional Behaviour, Code of Ethics and the CoLP specific Notifiable Association policy.

College of Policing

17. The College of Policing are not considering registration of specific private groups in the Counter Corruption Authorised Professional Practice (APP) but have been asked to keep this under review by the Home Secretary as referenced in the DMIP section. The approach the College has adopted is to increase the awareness of conflicts of interest by affiliation to an organisation or group that would amount to notifiable associations. In doing so this ensures it covers a broad spectrum of these types of association without singling out any specific club, membership, association etc. They state that any force policy on notifiable associations should reflect this, and this is what the CoLP policy is based on.

City of London Corporation (CoL)

18. The contractual provisions that apply to all City of London employees, including civilian employees within the City of London Police, are set out in the Code of Conduct and Conflicts of Interest Policy. The key provisions referring to conflicts of interest are as follows:

“Employees and other workers must declare membership of any organisation not open to the public (with formal membership and commitment of allegiance); which has secrecy about rules and / or membership, and / or conduct. For example, the Freemasons, a Society / Trust or an organisation with regular gatherings or meetings not open to members of the public who are not a member of the organisation.”

19. Elected members of CoL are required to disclose memberships which is available to the public, allowing transparency to those who hold such positions.
20. In this regard the CoL policy is more specific in its requirements than the current Force Policy. This does not and currently cannot, apply to Police Officers.

Consultation with the City Solicitor

21. A view from the City Solicitor was sought on the legal position and is shown in below.

Declarations made by employees are not made public and are retained in confidence.

The current position for police officers is that they cannot be compelled to disclose membership of such groups.

The relevant provisions re: restrictions are contained in regulation 6 of the Police Regulations 2003. In particular, reg 6(2) provides as follows:

6(2) No restrictions other than those designed to secure the proper exercise of the functions of a constable shall be imposed by the police authority or the chief officer on the private life of members of a police force except—
(a) such as may temporarily be necessary, or
(b) such as may be approved by the Secretary of State after consultation with the Police Advisory Board for England and Wales.

22. In relation to 6(2)(b) there is currently no legislation requiring a declaration to be made.
23. In conclusion, whilst police staff are required to make declarations under the terms of their employment contracts, the same cannot be said for police officers, who are office holders and, under the principle of policing by consent, are subject to professional standards instead, by virtue of the Police Regulations 2003.
24. In terms of voluntary disclosure, I can see no legal reason why such disclosures cannot be invited. However, this would need to be carefully worded to avoid any conflict with current Standard Operating Schemes (SOPs) within CoLP for registering declarable interests and associations.

Consultation with Police Federation and Superintendent's Association

25. Consultation with both the local Police Federation representative and the Superintendent's Association Chair has been undertaken.
26. In summary, whilst acknowledging the risk around associations with private and other groups, they are of the view that as there is currently no legal framework to enforce declaration of membership of groups and a lack of real evidence of any link between membership of groups and potential corruption, the suggestion of introducing any voluntary register is not supported, as without recourse to any enforcement it would be of little, if any benefit.

Chief Officer Team position

27. At the CoLP Chief Officer Team meeting on the 13th September 2023, a report outlining recommendations for consideration on the current position were discussed. As a result the recommendations below were agreed, and an updated position is included for Members information:

- CoLP is further reviewing its Notifiable Associations Policy to ensure there is better clarity around what a conflict, or a perceived conflict of interest is, when a member of any private group and provides practical examples.

Update: *The policy is reviewed on an annual basis or in cases of legislation or procedural changes. The policy was amended in April 2023 to clarify inappropriate associations and to formalise the reporting of attempts to obtain police information inappropriately through associations.*

- CoLP Professional Standards Department is continuing to monitor any national progress on this issue in terms of Associated Professional Practice (APP) and/or change in legislation and will review the position at that time.

Update: *The force has an extensive network both regionally and nationally with other professional standards departments and the college of policing. It prides itself on remaining at the forefront of any legislative or procedural changes and ensure they are reflected in force policy.*

- The Chief Officer Team agreed to voluntarily declare their membership of private groups e.g. Freemason's, Liveries, etc. This 'register' would be subject to annual update (unless the situation changes within that timeframe) and encompass police officer and police staff Chief Officer Team members. The PSD will hold the register and administer the process.

Update: *The Chief Officer team at the City of London Police recognise the importance of operational transparency particularly with the numerous public private partnerships the Force holds. To secure the ongoing confidence and trust of all CoLP communities and partners the Chief Officer Team has volunteered to disclose their membership of any private, public group or charitable organisations, including livery companies. The details of which will be retained on a confidential system within the Professional Standards Department, therefore open to scrutiny and maintained in a manner consistent with being a member of the police service. In the cases of new memberships, the Chief Officer will contact the Counter Corruption Unit to record the membership. The name, address, date, and purpose of the group will be logged and placed in a separate file within a secure folder. Due to the voluntary nature of*

this process no further action will be taken unless a notification takes place.

If a Chief Officer has a notifiable association as consequence of being a member of a group they will follow the procedure within the Notifiable Associations policy, disclosing membership of any group does not impact this process. The policy follows national guidance and enables the risk assessment of the association which services not only to protect the City of London Police, but the officer and their family.

Conclusion

28. Differing terms of employment underpinned by legislation and police regulations does not currently allow for consistency across both police officers and police staff. This is subject to ongoing review by College of Policing and as mentioned will be monitored by CoLP in terms of any future APP for police officers.
29. However, noting the current drive for transparency and building trust and confidence in the Police Service, the Chief Officer Team will now declare membership of private groups as described.

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Agenda Item 7

Committee(s): Professional Standards and Integrity Committee Police Authority Board	Dated: 7 November 2023 22 November 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 112-23	For Discussion
Report author: Detective Superintendent Kate MacLeod, T/Chief Superintendent Sanjay Andersen, Head of Professionalism and Trust	

Summary

This report provides an update regarding Equality & Inclusion (E&I) activity within the Force from a national and local perspective since the last report to your Committee in September 2023.

The report highlights activity regarding the E&I workstreams, the Police Race Action Plan, work on Violence Against Women and Girls and CoLP’s Inclusivity Programme. It also provides a draft Evaluation Strategy relating to the latter, this can be found at Appendix A.

Recommendation(s)

It is recommended that Members note the report.

Main Report

Background

1. This is a regular report to your Committee provided quarterly. It updates on activity relating to Equality and Inclusion in the City of London Police.

Equity, Diversity and Inclusion Strategy 2024-27 Refresh

2. Our new Strategy has now been through a consultation process with internal partners and presented to our Chief Officer Team. It explains the future direction for CoLP in this space, with all '4P' areas of activity (People, Public, Processes and Partners) pointing towards our mission to become the most inclusive and community oriented police force in the country. The Strategy is presented to this Committee as a separate standalone report for information.
3. Any observations are welcomed and will be incorporated into our final version, this will be an important feeder document into the annual refresh of our Policing Plan.

Current Position

Our Inclusivity Programme

4. We have recently added new dates for a number of events, these were updated by our Corporate Communications team w/c 16th October for internal sign up, they have also been shared with our colleagues in the City of London Corporation who continue to take advantage of these opportunities- at the recent talks from both Asif Sadiq (current special constable and Head of EDI at Warner bros) on his diversity journey and Jake Bowers (Director of Channel 4's '60 Days with the Gypsies') on Gypsy, Roma, Traveller, both had attendance from the City of London Corporation in double figures.
5. We have planned two further '**Focus on**' Sessions for early in 2024, these aim to improve awareness of the Jewish Faith/ Community and provide an understanding of how we can better serve Jewish Communities, these will be delivered by CST (Community Security Trust, a charity dedicated to this cause).
6. We have also now started the **Active Bystander** roll out across CoLP, receiving great feedback from first sessions delivered to colleagues in Professional Standards Department and Human Resources. We are one of the first forces nationally to be delivering this piece, ensuring that both officers and staff have the awareness they need to identify inappropriate behaviours and the confidence to call it out. Our Learning and Development team are working with colleagues in the City of London Corporation to see if there is an interest in replicating this module for members of their training team.

7. We have also been busy designing our **Ethical Dilemmas Programme**. Working with the British Transport Police (BTP), we have put together a training package which will enable Police Inspectors and equivalent staff managers, to conduct conversational sessions with their teams over the coming months. The idea is for participants to be presented with challenging scenarios, many of which will be real-life examples from our own force and others, and to have a psychologically safe space to talk through courses of action. We are aiming to launch this month and next, to also coincide with the launch of the new 'Code of Ethics' from the College of Policing.

Violence Against Women and Girls

8. Nationally, some recent changes in personnel have been announced; NPCC Violence Against Women and Girls lead DCC Maggie Blyth has been appointed as the new Deputy CEO of the national College of Policing, a new Assistant Chief Constable to head up the national Violence Against Women and Girls taskforce within the NPCC will be recruited in due course.
9. Locally, CoLP has submitted its White Ribbon application and will hopefully be in a position to update our panel result verbally at the next meeting. We continue to work with our City of London Corporation colleagues towards a plan to jointly mark the forthcoming period of action (white ribbon 'day' actually running from 25th November through to early December) and link up our communication plans. All men in our Chief Officer Team have signed up to act as Ambassadors to promote our joint ambitions with this Charity.
10. In CoLP, we have arranged for a 'focus on' session to take place online and delivered by the CEO of BeLads [Be Lads – help women feel safer](#) which we will be opening up to City of London Corporation members. We will also have an in person interactive workshop from a Theatre Company 'Alter Egos'. This will shine a spotlight on the reality of misogynistic behaviours, bystander intervention and the impacts of both negative behaviours and positive allyship. All of these sessions have been planned to take place in the period immediately following White Ribbon Day, our media team are fully engaged.
11. Locally, we continue to deliver Op Reframe and our new 'Walk and Talk' initiative with our partners in the City. Both programmes are being considered as we continue to inform our collective response as part of the Serious Violence Duty. We will also use activity taking place between now and during the festive season to help raise awareness of the White Ribbon campaign.

Police Race Action Plan

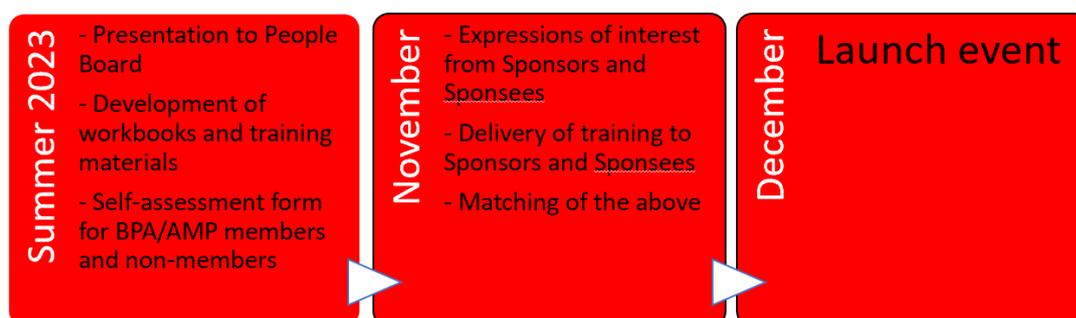
12. The National Black Police Association (BPA) conference took place in October, this event was well attended by members of our Senior Leadership Team as well as colleagues from CoLP's BPA. In CoLP, we are keen that we continue some of the themes highlighted over these 3 days by marking the launch of our own action plan internally. This will take place in late November with

representatives from CoLP, City of London Corporation and our networks invited, a key note speaker has been arranged and logistics being finalised.

13. CoLP's work against the Plan's 4 Pillars continues, examples of some of our current key activities under our 'Internal Trust and Confidence' pillar are provided below.

Sponsorship Programme

14. As part of our Race Action Plan's work on internal culture, we need to do more to support the recruitment and protect the retention of black, asian and minority ethnic officers and staff and develop our leaders of the future. This initiative will form part of our commitment to positive action, the below timeframe for delivery shows it will link in with our local PRAP launch event.



Positive Action Leadership Scheme (PALs)

15. Our third cohort of PALs started last month, testament to the benefits staff are discovering from this scheme, our Organisational Development team found we were over-subscribed for this cohort so will be delivering a further programme early in 2024. This programme is for constables, sergeants and police staff equivalents from ethnic minority backgrounds. It is a modular programme delivered over nine months and is based on Stephen Covey's 'Seven Habits of Highly Effective People'. The programme focuses on professional development and themes linked to the Seven Habits including building personal resilience, networking, presentation skills.

16. Following the launch of our local Police Race Action Plan (PRAP) later this month, we will be in a good position to start looking at other areas where engagement is required, specifically with our communities to ensure that their voices and feedback are captured at an early stage.

Appendices

- Appendix A – Evaluation Strategy, Our Inclusivity Programme

Contacts:

Det Supt Kate MacLeod

Professionalism and Trust

City of London Police

Kate.MacLeod@cityoflondon.police.uk

T/Chief Supt Sanjay Andersen

Professionalism and Trust

City of London Police

Sanjay.andersen@cityoflondon.police.uk

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Appendix A

'Our People – Inclusivity Programme' – DRAFT Evaluation Strategy

October 2023

Caroline Booth & Det Supt Kate MacLeod, Professionalism & Trust

Introduction

In December 2022 we launched our Inclusivity Programme and began delivering sessions from February 2023 onwards. To date we have delivered 4 Focus On events and 3 Mentivity sessions. We will be delivering Active Bystander, Alter Egos and Ethical Dilemmas from November 23 and will also be delivering further 'Focus On' sessions.

Our original proposal is outlined below, this document pulls together an evaluation strategy to see how the Inclusivity Programme has met its original objectives alongside the work we are doing with VAWG, PRAP and our E&I Strategy.

Original proposal

What do we want to achieve? Learning must:-

- Help us understand people's different journeys and backgrounds to create an inclusive working environment
- Facilitate positive intergroup interaction across different diversity types to reduce prejudice and discrimination
- Showcase the value in diversity of thought and bringing people with different backgrounds into policing.
- Embed the code of ethics and our values within everyone's day to day thinking and work.
- Address contemporary issues of Trust and Confidence in Policing, including examples that are specific to CoLP.
- Re-connect the force with its core policing values (Peelian principles).

How will we measure success?

- Requirement to articulate what we want people to think, feel and do as a result of this programme.
- Measurements could be qualitative (reflective accounts, blogs etc) or quantitative (PSD stats, survey results).
- Checking engagement and compliance will be key- use of PDRs?

Other considerations

- How will we acknowledge the existing level of experience, knowledge and lived experiences?
- Avoiding duplication of training- some will have received inputs already (Mentivity pilot, SMT input by Inclusive Employers, ECD Diversity Day etc)
- Walking the talk – new COT team, being visible, daily behaviours, asking the questions
- Importance of this programme not being viewed as a ‘tick box’ exercise following BLM, Protests etc

Evaluating the impact of the Inclusivity Programme

Evaluating the impact of this programme is based on providing a range of initiatives across a period of time. The evaluation needs to contain different approaches that both evaluate the impact but also continue to embed what we are trying to achieve. The section below outlines the range of activities and timings (8 Steps) which we plan to undertake.

Step 1) Popularity of programmes – immediate

- Attendance data - which programmes have attracted most attendees
- Who has attended
- Breakdown by department / directorate
- Breakdown by officer / staff
- Breakdown by rank / grade

Step 2) Post event evaluation – one week later – MS Forms

- MS Forms survey (to be kept brief) asking following questions:-

- | |
|---|
| <ul style="list-style-type: none">• Why did you sign up to this event?• Would you recommend this event and why?• What did you like about the event?• What did you learn and how will you use the learning? |
|---|

Step 3) Monthly Livechat events

- Post event discussions using renewed Code of Ethics
- Pose a question facilitated by Det Supt Kate MacLeod / Chief Supt Rob Atkin

Step 4) Capturing employee perception of inclusivity – quarterly

- Pulse survey - The Gartner Inclusion Index – this may be linked to cultural audit behavioural change

- Fair treatment: Employees at my organization who help the organization achieve its strategic objectives are rewarded and recognized fairly.
- Integrating differences: Employees at my organization respect and value each other's opinions.
- Decision making: Members of my team fairly consider ideas and suggestions offered by other team members.
- Psychological safety: I feel welcome to express my true feelings at work.
- Trust: Communication we receive from the organization is honest and open.
- Belonging: People in my organization care about me.
- Diversity: Managers at my organization are as diverse as the broader workforce.

- Group review – follow up face to face discussions based on outcomes above

Step 5: Launch event feedback – One year later – Senior Leadership Forum

- Review measures highlighted and provide information on action and impact taken

Step 6: Stay Interviews – 2/3 times a year – link to Matt Bradford

- 2/3 times a year – assess why employer wants to stay and what improvements could be made
- Review themes

Step 7: Workforce and leadership engagement – continuous

- Nudge communications – Inclusion Nudges
- Inclusion Nudges for Leaders | Inclusion Nudges (inclusion-nudges.org)

For Senior Leaders to have a session on inclusion nudges and a copy of the book (available from College of Policing library).

Step 8: Evaluating data

- 2021 data on grievances, complaints etc – baseline prior to introduction of programme
- 2022/23 data – potential increase (active bystander etc)
- 2023/24 data – potential downturn
- Attendance on PALs, sponsorship, mentoring etc AND outcomes

Concluding Remarks

The above steps provide a mixture of both quantitative and qualitative measures, we will use these as a targeted performance framework, incorporating what 'good' looks like, and also predicted timeframes for implementation. We will be able to start incorporating this framework in to forthcoming Committee reports, IASG meetings as well as CoLP's own internal E&I Strategic Board.

Agenda Item 8

Committee(s): Professional Standards Integrity Committee	Dated: 7 November 2023
Subject: Proposed Equity, Diversity & Inclusion Strategy for the City of London Police (2024-2027)	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 113-23	For Discussion
Report author: Det Supt Carly Humphreys, HQ Services	

Summary

This report presents a proposed draft of our new internal Equity, Diversity & Inclusion (EDI) Strategy (2024-2027). The draft EDI Strategy sets out our priorities and how we will embed these across our whole organisation to become the most inclusive police service in the country. The proposed publication date will be January 2024.

The Strategy underpins our values within the Policing Plan and outlines how we will continue to provide a professional and compassionate service to all of our communities. The draft Strategy also reflects the changing policing landscape over the past few years and in particular reflects the work we are doing to improve trust and confidence, both internally and externally.

It also recognises the significant strides we have made since the publication of our last Strategy in 2020 but acknowledges that we have much more to do in ensuring that we deliver a police service which meets the needs of our people and our communities. As part of this commitment we have set a number of ambitious equality objectives which will make us accountable for our progress and enable meaningful reporting to this Committee in the future.

This draft EDI Strategy has been written in consultation with the Corporation of London and also key stakeholders, however, consultation is continuing including with the Police Authority Director, IASG and City of London Police internal support networks. Additionally, Members may wish to note that photographs are still being commissioned and will be added prior to publication.

This report, containing a draft version of our new EDI Strategy is being presented to Committee for Members comment and observations. Please could any further comments be submitted via email to carly.humphreys@cityoflondon.police.uk

Once all consultation is complete and feedback received it is proposed that a final version is submitted to the December Police Authority Board.

Recommendation(s):

Members note the content of this report and provide comments on the draft.

Appendices:

Appendix A – Draft Equity, Diversity & Inclusion Strategy 2024-2027

Contact:

Det Supt Carly Humphreys, HQ

T:07523946343 E: carly.humphreys@cityoflondon.police.uk

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Equity, Diversity & Inclusion Strategy

2024-2027

Photographic placeholder

CITY OF LONDON
POLICE



"Our aim is for the City of London Police to become the most inclusive and community orientated police service in the country"

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COMMISSIONER FOREWORD

I am delighted to introduce our new Equity, Diversity and Inclusion Strategy (2024-2027) which is at the heart of our journey to create an environment where our employees feel valued and included. The strategy underpins the values within our [Policing Plan](#) and outlines how we will continue to provide a professional and compassionate service to all of our communities.

The foundation of effective policing lies in trust, confidence, and legitimacy. To truly uphold policing by consent, we must embrace diversity in all its forms. This means treating all our communities fairly and welcoming individuals into our organisation from various backgrounds. This range of unique perspectives drives sound decision-making and represents the rich tapestry of our communities. We know that by fostering an inclusive environment where everyone feels a genuine sense of belonging and knows that their voices are heard, we unlock the full potential of our organisation and deliver better services to our communities.

In developing our approach, we have involved our employee networks and associations, internal workstream leads, diversity champions, and key partners. Their insights and experiences have enriched this strategy, ensuring it is comprehensive and relevant to the realities we face.

While we have made significant strides since the publication of our last strategy, it is a long-term journey that requires unwavering focus. We are committed to building upon our past achievements and setting ambitious equality objectives. Our goal is not only to meet legal requirements but to exceed them, actively promoting equality across the delivery of all our services.

As we embark on this journey, we remain accountable to our communities. By fostering an inclusive culture that encourages open dialogue, we will cultivate a deeper understanding of the challenges faced by different communities and deliver a police service that meets unique needs.

I am excited about the positive impact this strategy will have on our organisation, the communities we serve, and the broader landscape of policing. Together, we will continue to work to become a police service which is the most inclusive and community orientated in the country.

20

ED&I Strategy Plan on a Page

24

Our aim is for City of London Police to be the most inclusive and community orientated police service in the country

Priorities:

Tangible outcomes Year 1:

What this will deliver:

Page 5

*****N.B. This is a placeholder and will populated once Strategy content agreed*****

CITY OF LONDON
POLICE



SECTION 01:

WHAT EQUITY, DIVERSITY AND INCLUSION MEANS TO US

The City of London Police is committed to promoting diversity and fostering an inclusive environment. Our focus lies in ensuring that all employees are valued and respected, thereby enhancing our ability to provide a professional police service across our diverse communities.

We embrace and support under-represented groups and encourage a workplace where everyone can be their authentic selves, regardless of race, age, gender identity, beliefs, abilities, or who they choose to love. Employee networks and groups play a vital role in promoting achievements and organisational values. Our focus remains on continuous improvement to foster a strong sense of belonging and pride in our collective accomplishments across our equity, diversity and inclusion workstreams.

Having Equity, Diversity and Inclusion front and centre in all that we do and reflecting the communities we serve, helps to enhance public trust and confidence. This leads to greater community engagement, improved problem solving and an increased ability to provide a professional and compassionate service to all of our communities.

Why have we replaced Equality to have a new Equity, Diversity and Inclusion Strategy?

Equity refers to fair treatment for all people, it differs from equality in a subtle and important way which is why we have moved towards this. While equality assumes that all people should be treated the same, equity takes into consideration a person's individual circumstances, adjusting treatment accordingly so that the end result can bring about equality.

Every individual has unique characteristics. When we talk about **diversity**, we refer to how these characteristics differentiate people from one another and from different groups. This is not just about physical diversity but also diversity of thought and the benefits which are brought to decision-making by having a range of perspectives.

Inclusion, also referred to as inclusiveness, is a concept that refers to the practice of providing equal access, opportunity, and consideration to all individuals, regardless of race, ethnicity, gender identity, age, sexual orientation, socioeconomic status, disability, religion – or any other characteristic that might lead to discrimination or marginalisation.

Our inclusivity commitment is to continue to create an environment where all our employees feel valued, respected, and empowered to participate fully, contributing to their full potential and able to be their authentic selves. This includes ensuring that diverse perspectives, backgrounds and experiences are taken into account and represented in decision-making processes, policies and practices. This commitment extends to all of the communities we serve, ensuring that our

inclusive policing approach builds trust and confidence and is supported by our policing plan priority to keep those who live, work, and visit the City safe and feeling safe.

Our new Equity, Diversity and Inclusion Strategy is not just about tolerance or acceptance; we go beyond that to actively embrace and celebrate the diversity of our people and the communities we serve.

SECTION 02:

WHERE WE ARE NOW – OUR EQUITY, DIVERSITY AND INCLUSION JOURNEY

Since the publication of our last Equality and Inclusion Strategy in 2020, the landscape of policing has changed dramatically. Sadly, there have been many instances across policing nationally where disrespect, abuse, misogyny, racism, homophobia and exploitation of police powers have shone a spotlight on the necessity to transform police culture. We see this Strategy as an opportunity to change the picture, we have brilliant people working for us who do brilliant things every single day. We want the public to see this and also all of the work we are doing to excel in our EDI commitments. This is why we will be ambitious in leading the way by ensuring that our organisation is trusted by our employees and the communities we serve, and that our workforce demonstrates the highest examples of our values of professionalism, integrity and compassion in all that we do.

At the heart of our policing model is legitimacy, and we can only maintain this through the support, trust and cooperation of our communities. Disappointingly, despite the significant work we have undertaken to improve our representation of the communities we serve within our workforce, we still lack officer representation of ethnic minority groups and women at all levels. Improving our representation and the experience of policing by our diverse communities will remain a top priority. Equally, we will prioritise our work to become an organisation which is demonstrably anti-racist and proactive in tackling discrimination. To understand our progress on this journey we will use our most recent 2020 Inclusive Employers benchmark and ensure that this is refreshed in 2024.

Our 2020 benchmark placed us at the 'Compliant' stage within the Inclusion Maturity Model. We were extremely disappointed with this and over the past 3 years have dedicated efforts across all areas of the organisation to provide rapid and tangible progress in this area. We have an extensive commitment to get this right with an aim for 2024 to be graded as at least 'Established'. We will review our progress with candour and ensure a clear focus on developing an inclusive, high performing workforce to deliver an excellent policing service.

Inclusion Maturity Model



Since 2020, we have also published our new [Policing Plan](#) which marks a fresh start for the City of London Police during what remains a difficult time for policing. The Policing Plan is focused on rebuilding trust, putting victims first, and creating an inclusive and supportive culture. It aims to attract diverse talent, prioritise well-being, and develop strong leadership capabilities.

Our new Equity, Diversity, and Inclusion (EDI) strategy encourages culturally competent policing and reduces biases, leading to more effective crime prevention and resolution. Moreover, it addresses how we can overcome disproportionate impacts, such as how we apply our use of force powers, cultivate inclusive leadership, and foster an environment that values diversity.

This strategy also sets out in greater detail how we will support all of our communities. We know that communities are not homogenous, they are composed of individuals from various backgrounds, cultures, races, religions, genders, and more. An inclusive police service reflects the diversity of the communities it serves, allowing officers to better understand and connect with the people they protect. When community members see officers who resemble them or share similar experiences, trust and cooperation are more likely to be established.

Our culture has continued to mature by embracing the wider range of perspectives and ideas which our people, public and partners offer. Different backgrounds and life experiences bring unique problem-solving approaches and creative solutions, our approaches to neighbourhood and evidence-based policing are just some of the ways we welcome diverse viewpoints to solve complex challenges in more comprehensive and innovative ways.

We have continued to invest in improving upon the cultural competence of our workforce. Our employees are now trained in cultural awareness and sensitivity through bespoke Inclusivity programmes, making them better equipped to navigate cross-cultural interactions and understand the nuances of diverse communities. This understanding reduces the likelihood of unintentional biases and misunderstandings, promoting fair and respectful treatment for everyone and creating a police service we can be proud of.

KEY ACHIEVEMENTS SINCE OUR LAST STRATEGY

Establishment of Professionalism and Trust directorate:

To address challenges in policing, a directorate focusing on professionalism and trust was created. It manages strategies for violence against women and girls, racism in policing, and other areas, including Equity, Diversity, and Inclusion.

Mentivity:

Training to gain insight into young Black people's experiences of interacting with the police.

Listening Circles:

Safe spaces for women to share experiences, recognized as good practice by the HeForShe movement.

Disability Enabling Network and DANI working group:

Addresses neurodiversity inclusivity with various stakeholders, prioritizing areas like workplace adjustments and recruitment.

ADHD screening in custody national pilot:

Fast-track ADHD diagnoses for detainees to improve case outcomes and mental health support.

Superintendent's Association:

Sponsorship and support for underrepresented individuals to develop into leaders, resulting in increased female representation.

Active Bystander training:

Being rolled out to leaders to tackle inappropriate behaviour and support staff well-being.

Dyslexia Assessment Team (DAT) launched:

Supports colleagues with dyslexia to reach their potential by providing assessments and reasonable adjustments.

SignVideo app:

Makes the City of London Police accessible to Deaf BSL users, offering communication services via video calls.

BSL trained officers:

Eight officers are Level 1 BSL trained, and Police Liaison Officers for Deaf people are being established.

Events to tackle under-representation in policing:

Organized by the Network of Women, including open-days with British Transport Police to showcase roles and demystify training requirements.

Operation Reframe:

Partnership approach to keeping people safe in the City at night, which includes working with licensed premises, security staff and promoting the 'Ask for Angela' campaign.

Youth Independent Advice & Scrutiny Group (YIASG)

Introducing a YIASG to afford further external, independent scrutiny of policing provisions and services, but through the lens of a young person.

SECTION 03:

OUR PRIORITIES

Over the next 3 years of this Equity, Diversity and Inclusion Strategy, we will deliver on the following priorities:

Our People	We have a workforce that reflects the communities we police and an environment which creates a sense of belonging.
Our Public	Equity and inclusion is central to how we deliver our service (local and national communities) and the public trust us to act fairly and with integrity.
Our Processes and Policies	Our policies, processes and procedures are fully inclusive and informed by diverse representation on our scrutiny and key decision-making bodies.
Our Partners	We influence equity and inclusion through our network and supply chain

SECTION 04:

OUR PEOPLE: *We have a workforce that reflects the communities we police and an environment which creates a sense of belonging.*

We will achieve this by:

- a) recruitment activity that improves how well our workforce reflects the communities we serve, including a career pathway from police cadet to police officer or police staff.
- b) positive action schemes that support officers and staff from under-represented groups to develop laterally and through promotion
- c) leaders championing and being accountable for equity, diversity and inclusion
- d) fostering an inclusive culture where our people feel a sense of belonging
- e) promoting behaviours and conduct in line with the Policing Code of Ethics, dealing swiftly with discrimination, micro-aggressions and behaviour falling below this standard

Recruitment activity that improves how well our workforce reflects the communities we serve:

Our current workforce profile shows that disappointingly, we still have much more work to do to become fully representative of our communities.

Population

8,600

people

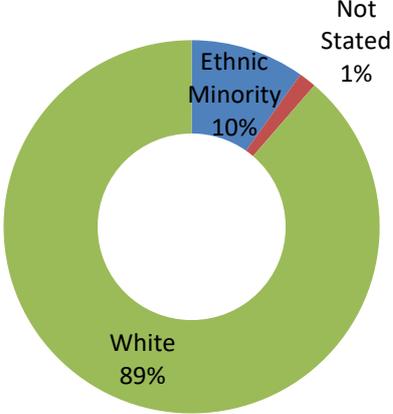
56,490,000 people in England

Rounded to the nearest 100 people

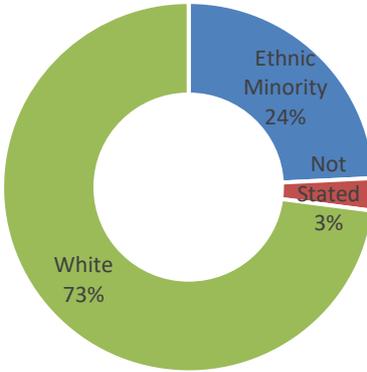
Data based on the 2021 Census shows that the City has a residential population of 8,600. However, the public we serve are beyond the square mile and span nationally and internationally through our National Lead Force areas for Cyber and Fraud. Indeed it is estimated that in 2021 there were 587,000 workers who commuted into the City of London.

Although we are working to improve representation across all protected characteristics, we know that greater representation for all minority ethnic groups and women in policing is critical to improving trust and confidence across our communities. Our current profiles are outline below:

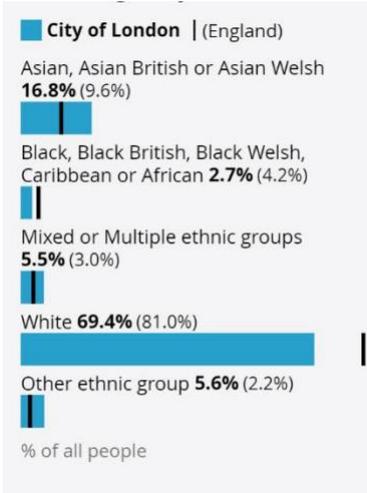
Officer Ethnicity Profile (%)



Staff Ethnicity Profile (%)



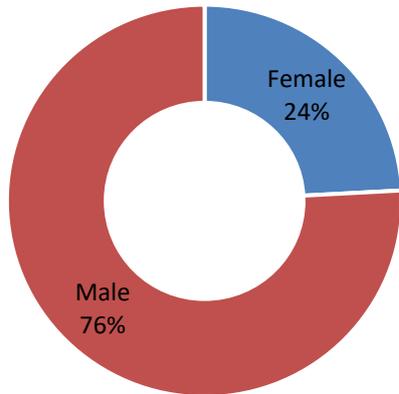
Ethnicity (residential):



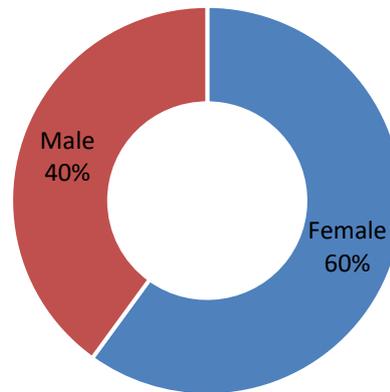
As of 2022, 37% of the **commuter workforce** was black, Asian or identified from another minority ethnic group, with the remainder identifying from a white ethnic background.

Data based on the 2021 Census shows that the City has a growing diverse ethnicity profile comparatively amongst our staff compared to our residential and workforce populations, however we need to work more innovatively to improve this for officers.

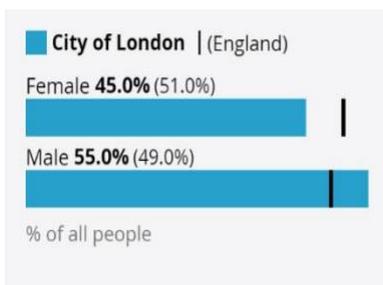
Officer Gender Profile (%)



Staff Gender Profile (%)



Gender (residential):



As of 2022, the **commuter workforce** gender split showed that 64% of workers identified as male with 36% identifying as female.

Data based on the 2021 Census shows that the City has a largely equal gender residential split, although less so for our workers. This is reflected across our staff profile and shows that we need to work more innovatively to improve this for officers.

Our representation levels are continuing to improve through our recent recruitment initiatives under the police uplift programme which have contributed to increased diversity. However, we need to do much more to improve the pace of this change. A significant impact will need to be made through our recruitment and retention strategies which will incorporate additional outreach activities to attract more people from under-represented groups, particularly women and those from minority ethnic backgrounds. We also need to improve upon how we more accurately measure representation beyond our residential population to understand how we represent our workers and leisure visitors across the City of London.

One area of work will be to continue to provide targeted support to people from under-represented groups throughout the recruitment process, probation period and career pathways. Our employees should see diversity represented in our senior leadership across all ranks and grades. Finding ways to attract and retain diverse leaders is key to fostering an inclusive workplace, it also demonstrates to our employees that representation is a priority for all.

Positive action schemes that support officers and staff from under-represented groups to develop laterally and through promotion:

We will continue to operate positive action development schemes to help bridge our representation gaps within and across different levels of the organisation by providing targeted support and opportunities to these under-represented groups.

In our recent promotions for Inspectors and Sergeants, HR collaborated with our Disability Enabling Network to ensure suitable reasonable adjustments were applied, making use of trained officers to assess individual adjustment requests and recommended necessary support.

Our PALS, the Positive Action Leadership Scheme, launched in 2021, which empowers officers and staff from visible Black or ethnic minority backgrounds with vital career development tools. Comprising six modules delivered over nine months, it focuses on presentation skills, networking, confidence-building, mentoring, and strategic awareness. Increased participation in 2022 highlights its success, and its continuation in 2023 reinforces our commitment to a more diverse and inclusive leadership team. Future work will involve providing these schemes to other under-represented groups. Next year we will also launch our new Sponsorship Scheme, an initiative adapted from the NHS which has created an ongoing partnership to share best practice across EDI activity.

Leaders championing and being accountable for equity, diversity and inclusion:

Lessons learned from Operation Hotton, have been just as important to our organisation as all forces nationally, to recognise the importance of supervision and leadership which sets the right tone and supports those who challenge poor behaviour.

Professionally developing our supervisors and line managers and also creating a culture of inclusive leadership is a crucial focus for us in the challenging yet rewarding role of policing. We have refreshed our Core Leadership Programme and Management Development Programme for supervisors and first-line managers. Additionally, our promotion framework and performance development process requires leaders to demonstrate their contribution to equity, diversity and inclusion.

The annual staff survey and pulse surveys are important opportunities for us to gauge employee feelings, allowing us to address concerns and improve psychological and emotional safety. All of our senior leaders have been given personal responsibility to improve outcomes from the staff survey.

Above all, we do not underestimate the role which our Senior Leaders have to foster an equitable, diverse and inclusive workplace. We know that irrespective of how many diversity training and inclusion programs we incorporate into our organisation, all efforts will be hampered without our Senior Leaders being visible and pro-active in their support. We will achieve this by ensuring EDI advocacy becomes a focus of all that we do. This will be seen through our continued work to actively champion inclusivity schemes such as PALs and our Sponsorship Scheme, and also how our senior leaders role-model inclusive behaviour in their people management and across their own leadership teams.

Fostering an inclusive culture where our people feel a sense of belonging:

The Our People Inclusivity Programme, launched in 2022 and 2023, is a series of mandated events that allow participants to reflect on the significance of creating an inclusive culture. These events serve as gateways to a broader Inclusivity Programme, where all employees are required to undertake continuous professional development in this area through a blended learning approach.

The Programme also contains a focus on supporting, developing and retaining our neurodivergent colleagues. Policing has become far more attuned to reasonable work adjustments, particularly when thinking about neurodiversity; ranging from adjusting the working environment to providing software to assist with typing. However, we are now more switched on regarding the strengths, values and diversity of thought which this brings to our organisation. This is especially beneficial within our National Lead Force areas of Fraud and Cyber where often our neurodivergent colleagues can see solutions where others can't through different thinking and approaches.

Complementing the Inclusivity Programme will be a series of pro-active and innovative team cultural audits which looks at the internal conduct and culture of teams. The cultural audit will provide the workforce with an opportunity to share how they feel about their immediate work environment, as well as the wider workforce. The results of the cultural audit will provide managers with an understanding of underlying issues or concerns which may not have been formalised and the support and tools to address these and give confidence to the workforce that issues are being logged. The cultural reviews will also allow the force to have an understanding of risk areas or emerging themes needing closer attention and action.

Recognising the unique challenges which policing can bring, especially for frontline employees, we have prioritised supporting our new recruits, particularly probationer officers. The Buddy Scheme and Friendly Ear program provide access to professional support from colleagues and continue to grow in attrition.

Dealing swiftly with discrimination, micro-aggressions and similar inappropriate conduct:

It is vital that all those who work in policing have trust and have confidence in the police as their employer and feel empowered to uphold the high standards that the public rightly expect. To do that they must feel supported, especially when they are raising concerns and identifying where standards need to improve.

In response, we are strengthening our recruitment and vetting procedures to prevent unsuitable individuals from pursuing or continuing careers in policing. The findings from the Casey Review were a difficult read and hard hitting for everyone in policing, but brought with it a number of recommendations to focus on the need to strengthen the vetting and disciplinary system – ensuring only the right people come into policing and those who do not meet the standards are quickly removed.

We have invested in our Professional Standards Department capabilities to address increased reporting and robustly deal with anyone who does not meet our high standards of behaviour or demonstrates discriminatory beliefs. Resourcing has been increased in this area to conduct enhanced prevention work, including risk profiling to embed early interventions and prevent escalation. Our Professional Standards Department is also managing a number of activities within

the [Police Race Action Plan: Improving policing for Black people \(college.police.uk\)](https://college.police.uk) in order to improve trust and confidence for our employees and external Black and minority ethnic communities in this area.

One area of focus is to continue in prioritising our response in tackling incidents of internal misogyny as set out in our [Strategic Delivery Plan for Violence Against Women and Girls | City of London Police](#). We have already implemented a number of internal innovative initiatives, some examples include:

- Holding listening circles for women throughout 2022, where female colleagues could safely share experiences and concerns, and find ways to deliver real change for women working for the City of London Police. This was identified as best practice by the College of Policing nationally and implemented by a number of other forces.
- Delivering the ‘Leading with Impact’ professional and personal development course to female officers and staff.
- Improving how the City of London Police uncovers and deals with misconduct by: increasing colleagues’ awareness of early indicators of unacceptable behaviour; highlighting [different routes for reporting concerns about behaviour and misconduct](#); and reviewing historic cases and our vetting processes.
- Accepting the recommendations made by the NPCC and College of Policing in their [review of themes, learnings and recommendations on police-perpetrated VAWG](#) (published October 2022) and continuing to work with stakeholders to address the recommendations made, including the development of a process map to formalise how cases of police-perpetrated domestic abuse are managed.
- Rolling out ‘Domestic Abuse Matters’ training to all police officers, and police staff in relevant roles last year, with more than 300 colleagues having taken part in the training designed to change and challenge the attitudes, culture and behaviour of colleagues when responding to domestic abuse.
- Publicising forthcoming [misconduct hearings](#) on our public-facing website and detailing the outcome of these, including where an officer is added to the police barred list.
- Taking every opportunity to promote awareness of action to address VAWG, with the [Commissioner opening the City of London Crime Prevention Association’s related event in February 2023](#).
- Issuing the [Professionalism newsletter](#) to colleagues every quarter, providing learning from complaints and conduct, national cases of significance and activity or information that supports our Standards of Professional Behaviour.

- Introducing ‘Walk & Talk’; a scheme whereby women visiting, working or living in the city can walk and talk with police officers, to share their thoughts on safety to bring about positive change.

Our values denounce racism and any form of discrimination as we are committed to becoming an anti-racist organisation. We wholeheartedly support the National Police Race Action Plan, and are delighted to be an Ice Breaker force to showcase our work in adopting it into our delivery plan to rebuild trust with our Black employees and communities. Together, we are embarking on a mission to challenge and eliminate bias, ensuring that our organisation is a place where discrimination has no room to breathe.

Our commitment goes beyond merely being "not racist." We aim to become an actively anti-racist organisation that Black people can trust. This plan demonstrates our zero-tolerance stance on racism and our determination to make further progress in collaboration with all staff networks and associations, especially the Black Police Association (BPA). Together, we will work towards creating an environment that promotes trust and inclusivity.

While we recognise the progress made, we acknowledge that more work is needed. We are committed to addressing racism, discrimination, and bias at all levels, including policies and procedures that negatively impact Black individuals.

Our zero-tolerance approach towards racism is supported by a dedicated Professionalism and Trust team, working closely with all of our Networks and Associations. We hold each individual accountable to uphold these values, ensuring there is no place for racism within our organisation.

Examples of our innovative initiatives to deliver against our local Race Action Plan have included:

- Black History Month – our celebrations included a number of force wide events, including talks from inspirational people from the Black community.
- Sponsorship Programme - this year we are developing and launching a Sponsorship programme for our Black, Asian and minority ethnic colleagues. We are committed to ensuring that we support the investment in recruitment and also protect the retention of Black, Asian and minority ethnic Officers and Staff. This initiative will form part of our commitment to positive action and developing our leaders of the future.
- Positive Action Leadership Scheme – we will continue to deliver this successful programme and measure the impact it is making towards promotion and lateral achievements amongst these under-represented groups.
- Support for Promotion - a Promotion Development Programme is currently being developed to provide support to officers from under-represented groups who are applying for promotion up to Inspector rank. Not only will this further our business case for positive action, it will also help to ensure that City of London Police retains a diverse workforce. The programme will include inputs on dealing with barriers and risks, structuring best evidence, dealing with operational scenarios, current affairs in policing, navigating police culture and building confidence as future leaders. City of London Police will also include its sponsorship for females and minority ethnic

officers and staff to join the Future Supers programme, last year our Superintendent promotion process resulted in 4 out of 5 successful candidates being female.

The City of London Police has zero tolerance for any discrimination, bullying or harassment. We strictly adhere to the Equality Act 2010, safeguarding every individual from discrimination and harassment. We consider all protected characteristics, including age, disability, gender confirmation, race, religion, sex, sexual orientation, and gender identity. Bullying & Harassment are incompatible with our Values and will not be tolerated. We support affected colleagues, encourage a culture of openness around raising concerns, and provide mandatory training on unconscious bias to reduce prejudiced behaviours.

Measures:

- 1. Our recruitment activity is improving how well our workforce reflects the communities we serves.**
- 2. Under-represented groups have access to a dedicated support and careers programme for promotion and lateral development.**
- 3. Annual workforce data on recruitment and retention shows similar progression rates for officers and staff across all under-represented groups.**
- 4. Leaders are held accountable for staff survey results to show improved outcomes in engagement and sense of belonging.**
- 5. Year-on-year increases in the proportion of employees who self-declare their diversity characteristics.**
- 6. Our Inclusive Employers benchmark score improves to 'Integrated' with national best practice safeguards to deal with all forms of discrimination by 2027.**
- 7. Our Reward and Recognition processes identify and celebrate those modelling positive EDI behaviours.**
- 8. The evaluation of our Inclusivity Programme demonstrates that we are positively improving culture and feelings of belonging.**

SECTION 05:

OUR PUBLIC: *Equity and inclusion is central to how we deliver our service (local and national communities) and the public trust us to act fairly and with integrity.*

We will achieve this by:

- a) Understanding and engaging with all our communities so we can measure the impact of our priorities and services, adjusting the policing provisions and services accordingly
- b) acting with cultural awareness to ensure that all our communities are treated with fairness, dignity and respect
- c) maintaining the highest standards of response to hate crime, ensuring we take action to provide appropriate and sensitive community reassurance

Understanding and engaging with all our communities so we can measure the impact of our priorities and services, adjusting the policing provisions and services accordingly:

A community profile will map the diverse communities in the City of London. This will be regularly updated and made available to our people and the public. We will use this information to target our engagement activity ensuring it is representative of all our communities and uses the most appropriate channels.

To better understand the needs of our communities, we are developing a new community feedback platform and community survey to provide more accessible opportunities for our residents, workers and visitors to share their experiences and views. The survey will be invaluable in achieving a better feel for what policing issues matter the most to the public we serve right now. [Community feedback | City of London Police](#)

This understanding will extend beyond our territorial policing obligations to how we support communities in our national lead force responsibilities. As part of this commitment, we will remain forward-thinking in how we ensure our digital and in-person services support all of our communities. This ranges from accessibility of language and print to signposting those from vulnerable or underrepresented groups who require additional support through our new 'Next Generation Fraud and Cyber Crime Reporting and Analysis Service (FCCRAS) project'.

Our engagement with communities who have lower levels of trust in policing is particularly important. Through regular dialogues and forums, we aim to collaboratively address concerns,

gather feedback, and foster open lines of communication. We recognise that improving trust and confidence must be met with action and we will be steadfast in our commitment to driving meaningful change through our localised Race Action Plan and Violence Against Women and Girls Action Plan. Our plans link into the national Police Race Action Plan Strategy and the NPCC (National Police Chief's Council) Violence Against Women and Girls strategy, ensuring that we are working collectively to improve trust and confidence across our national and our local communities.

Through our implementation of the national Police Race Action Plan we will drive activity to increase the involvement of Black communities and those from other ethnic minority groups, in the work that we do. Our engagement plans set out a series of actions that will support a step change in the way that we engage with, and respond to input and feedback from these communities, particularly digital engagement platforms to capture our transient Black business and leisure communities. We will also work to attract greater involvement of these communities in our IASG and workforce to provide oversight and scrutiny activity, as well as input to inform our strategic decision-making at key governance boards.

The NPCC Violence Against Women and Girls Strategy was launched a year prior to the national Police Race Action Plan, meaning that we have already embedded a number of community engagement initiatives, and can bring the learning and best practice into how we engage with our Black communities. Examples can be seen through our successful Operation Reframe events and our Walk & Talk schemes to bring about positive change within the City.

Acting with cultural awareness to ensure that all our communities are treated with fairness, dignity and respect:

In 2022, a dedicated 'Professionalism & Trust' department was established to bring together key areas of policing which work towards rebuilding trust and confidence internally and amongst our communities:

Through this department, we support our Policing Plan objective of continuous improvement and learning from experiences. We encourage a culture of learning and development, seeking lessons from other organisations, experimenting with new ideas, and using feedback from colleagues, partners, the public, and academia to improve our approach to policing diverse communities.

We will continue to develop our wide range of innovative approaches to engage with our communities and increase confidence in policing, particularly amongst those groups who have lower levels of trust and confidence. We will ensure our officers are knowledgeable about the diverse needs of our communities, and are well-trained in key aspects of equity, diversity and inclusion. For example, we are working with the Mentivity community group to improve our understanding of, and engagement with young Black people.

As seen through our ADHD pilot and other innovative schemes, we will ensure detainees receive the care and support they need, fostering a compassionate and responsible approach to policing. This includes provision of additional support for people with mental health concerns.

Maintaining the highest standards of response to hate crime, ensuring we take action to provide appropriate and sensitive community reassurance:

Our approach to tackling hate crime will be informed by national best practice. This will be a multi-faceted approach which involves a pro-active stance on prevention, involving educational initiatives which raise awareness about hate crime and broader crime where discrimination is a factor, developing our collaborative partnerships with community organisations, schools, and religious institutions to foster a culture of tolerance, diversity and mutual understanding. Maintaining precise records of hate crime incidents will enable us to develop opportunities to prevent. We will also maintain transparency in our performance in this area with regular publication of hate crime statistics.

In our policing response to serve all communities, we will continue to prioritise the safety and well-being of victims of hate (and other) crime, a firm commitment in our Policing Plan.

Other examples of our community initiatives to deliver against our Action Plans have included:

Focus on... 'Gypsy, Roma, Traveller (GRT)':

In celebration of GRT month, an awareness talk was delivered to 148 members of staff regarding GRT history, and discrimination suffered by the community historically, through to the present day. Stereotypes and the damage these cause are discussed, and an emphasis placed on valuing and respecting GRT culture and values.

Focus on... 'Find your Why':

Delivered by Asif Sadiq, a former CoLP officer, who brings a wealth of diversity and inclusion knowledge from his former position as Global Head of Diversity, Inclusion, and Social Impact at Adidas, and in his current position as Chief Global Diversity, Equity, and Inclusion Officer at Warner Bros. Discovery.

Apology letter to the LGBTQ+ community:

The Commissioner recognised and acknowledged the harmful way in which the LGBTQ+ was historically policed which undermined the trust and confidence in policing by this community. Peter Tatchell, Director of the Peter Tatchell Foundation, acknowledged the importance of this apology for the LGBTQ+ community.

'Alter Egos Theatre Company Presents...':

Alter Ego are one of the UK's leading Social Change Theatre and Film production companies. They have worked with CoLP's Professionalism & Trust (P&T) Team to create a bespoke product aimed at improving awareness of misogynistic behaviours and how to tackle them in the workplace. Alter Egos have already delivered successful inputs to Colleges and Universities, the NHS, Social Services, other Police Forces and the Ministry of Defence.

'Mentivity' Inputs:

Consist of whole-day in-person sessions, aimed at gaining insight into young Black people's experiences of interacting with the police. The Charity's founder, Sayce Holmes-Lewis, started the charity following his experience of being stopped & searched, and works with police forces to increase understandings of Black peoples' experiences and perceptions, and has regularly delivered training to CoLP's officers.

Focus on... 'Be Lads':

An awareness and safety campaign which provides practical advice to men, to assist women in feeling safer when they are walking alone. It recognises that most men do not wish to be perceived as threats to women and addresses why women are justified in being concerned as such. Following the tragic death of Sarah Everard, the conversation around women's safety is more important now than ever before. 'Be Lads' explains the significant of this event and the way it has fractured the public's faith in policing, without vilifying all police officers.

Measures:

- 9. We have a demonstrable understanding of the diverse needs of local and national communities.**
- 10. Our public feedback is positive around the skills and capabilities of our employees in dealing with EDI related issues.**
- 11. Arrangements for consulting and working with our communities, particularly those from under-represented groups are in place.**
- 12. Our positive outcome rate for investigating Hate Crime is higher than the national average.**

SECTION 06:

OUR PROCESSES AND POLICIES: *Our policies, processes and procedures are fully inclusive and informed by diverse representation on our scrutiny and key decision-making bodies.*

13. Our public have confidence in the City of London Police.

We achieve this by:

- a) analysing and publishing data on disproportionality and use of police powers, at least annually, with a reform or explain approach where required
- b) ensuring internal and external scrutiny and decision-making include a range of perspectives that are representative of our workforce and communities
- c) engaging regularly with staff networks and associations so their perspectives and concerns are considered
- d) ensuring policies and practices enhance workforce equity and inclusion, including workplace adjustments, equal pay, flexible working with a clear and transparent process around promotion opportunities

Analysing and publishing data on disproportionality and use of police powers, at least annually, with a reform or explain approach where required:

We understand that the impact of how we use our police powers, especially stop and search and use of force, significantly impacts minority ethnic communities and influences trust and confidence in the police. To address this, we have implemented robust processes for scrutiny of the use of these powers. These processes enable us to examine and develop our understanding where disproportionality in our actions exists, supplemented by our work with our communities and partners as part of the National Police Race Action Plan to improve how we can reform or improve our ability to explain. By continuously evaluating and refining our practices collaboratively, we strive to ensure fairness, transparency, and accountability in our interactions with all members of the community, fostering trust and confidence in our policing approach.

Ensuring internal and external scrutiny and decision-making is informed by a range of perspectives that are representative of our workforce and communities:

The City of London's Police Authority Board and its Professional Standards & Integrity Committee (PSIC) have also become more representative of our communities, this enables them to apply scrutiny and monitor performance with a diverse lens. They play a vital role in helping us to embed equity, diversity and inclusion through all areas of policing. Both the Police Authority

Board and Professional Standards & Integrity Committee ensure that complaints and misconduct with a discriminatory nature are closely scrutinised along with our stop and search and use of force data. They also monitor our representation across officer and police staff numbers, and examine how we engage with our communities, particularly those from under-represented groups.

Our Independent Advisory Scrutiny Group (IASG) comprises of independent community members, representing residents, businesses, and diverse groups in Greater London, including under-represented populations. As recommended in [The Macpherson Report: twenty-one years on \(parliament.uk\)](#), the IASG facilitates two-way dialogue between the police and communities, promoting effective engagement and community reassurance. The IASG plays a vital role in scrutinising specific policing areas, such as stop and search data, use of force data, and public complaints. Their feedback and voice enable us to improve our interactions with both employees and communities, fostering transparency and accountability.

Recognising the need for a youth perspective, we are launching a Youth IASG led by individuals aged 14 to 18. This new group empowers young people to influence policing practices and build trust and confidence within all communities. By including their views, we aim to enhance the quality of our policing services and cater to the needs of our youth population effectively.

We recognise that we have a deep impact on the communities we serve, and decisions made by the police can profoundly influence people's lives. By involving external community groups in the scrutiny process, we ensure that diverse perspectives, concerns, and experiences are taken into account when evaluating our practices and policies.

Internally, our recruitment efforts have resulted in growing diversity, leading to a wider range of perspectives and contributing to a truly inclusive workplace. This diversity of thought has been invaluable in challenging our current practices and identifying areas for improvement in our inclusivity journey.

Engaging regularly with staff networks and associations so their perspectives and concerns are considered:

Involvement of internal and external communities, including our own Staff Networks and Associations, provides us with 'checks and balances' on our decisions and behaviours, it can also help us to identify biases and blind-spots in our decision-making processes. By bringing attention to these issues, we can work towards more equitable and fair practices.

Each Network and Association has a senior Diversity Champion who supports their goals, champions workstreams and promotes achievements through the EDI Strategic delivery board. This regular engagement cultivates continuous improvement for the organisation as it encourages a proactive approach to addressing concerns and making necessary adjustments to our policies and procedures. Our Networks and Associations also participate in a number of our key decision

boards to ensure that the perspectives of our employees and communities they represent are considered.

Ensuring policies and practices enhance workforce equity and inclusion, including workplace adjustments, equal pay, flexible working with a clear and transparent process around promotion opportunities:

Recognising the historical barriers to diversity in policing, particularly related to race, gender, and sexual orientation, we have taken proactive steps to address these issues. Our Staff Networks and the newly formed Professionalism and Trust team have played a crucial role in driving these changes. As a result of their work, we have introduced important updates to our policies and procedures. These include the development of a Sponsorship Scheme to support Black and ethnic minority employees, a refreshed policy on Transgender and Gender, and a staged return to work policy for those returning from parental leave.

We appreciate that achieving true equality involves ongoing efforts to address and minimize disadvantages faced by individuals due to their protected characteristics. The Equality Act 2010 forms the backbone of our commitment, providing a comprehensive legal framework for protecting individuals from various forms of discrimination.

At the heart of our approach is an understanding and appreciation of intersectionality across protected characteristics. We acknowledge that individuals can experience multiple forms of inequality or disadvantage, and these complexities can compound, creating unique obstacles that require careful consideration. To address this, we ensure that intersectionality is ingrained in our decision-making processes. Every policy undergoes an Equality Impact Assessment (EIA) Review, and those policies directly affecting protected groups are additionally scrutinised at our Equity, Diversity, and Inclusion Strategic Board. This board is chaired by the Commissioner and includes representatives from all employee Networks and Associations, guaranteeing that a diverse array of perspectives are considered.

While the Equality Act outlines the general duty for public authorities to combat discrimination, it does not prescribe specific methods. However, we recognise the importance of conducting Equality Impact Assessments (EIA) to uphold our commitment to inclusivity. EIAs serve as an effective tool to ensure that both new and existing policies are fair, inclusive, and free from discrimination. The EIA process also systematically reviews policies to eliminate unconscious bias and ensure fairness in our decisions. This commitment reinforces our ethical practices and creates a positive impact on communities and suppliers.

By adhering to these principles, continuing to link in with the College of Policing to access national best practice and embedding EDI considerations into all our activities, we will continually strive to create a safe and inclusive environment for everyone who works for us and the valued communities we serve.

Measures:

- 14) Our key decisions are informed by our engagement with our Networks and Community groups.**
- 15) Our policies are reviewed annually to ensure they do not promote structural or systematic inequalities.**
- 16) Our EDI Strategic Board members feedback that there is a coherent approach to implementing our Strategic objectives across our organisation.**
- 17) Our organisation has policies and procedures in place which are actively used to promote equality by managers.**
- 18) There are high satisfaction levels across all staff networks and associations in respect of engagement on our policies and procedures.**
- 19) Structural and systemic inequalities are reduced as a result of the community and workforce scrutiny and contribution into our policies and procedures.**

SECTION 07:

OUR PARTNERS: *We influence equity and inclusion through our network and supply chain.*

We will achieve this by:

- a) Contributing to development and delivery of the wider City of London Corporation equity and inclusion strategy.
- b) Embedding equity, diversity and inclusion throughout the contract process and work with suppliers who are diverse owned enterprises and/or have proven to take active steps within their own organisations, supply chain and industry.
- c) Using our understanding of local communities/protected characteristics needs to inform partnership activities to keep communities safe.

Contribute to development and delivery of the wider City of London Corporation equity and inclusion strategy:

Our organisation already aligns itself to the City of London Corporation's Equity and Inclusion priorities, this includes supporting the application of their policies across our workforce, supply chains, partnership standards and ethical procurement. We will engage with the Corporation on their new EDI strategy and consider how we can collaborate to achieve common goals.

Embedding equity, diversity and inclusion throughout the contract process and work with suppliers who are diverse owned enterprises and/or have proven to take active steps within their own organisations, supply chain and industry:

The organisations we choose to work with and the partnerships we build, have implications on the trust and confidence communities have in us. By prioritising fair treatment of workers and respecting human rights in our ethical procurement practices, our organisation demonstrates our commitment to social justice and fairness.

Within this we will support the City of London Corporation's Responsible Procurement Commitments to embed equity, diversity and inclusion throughout our contract process and work with suppliers who have proven to take active steps within their own organisations, supply chain and industry. This will also include working with suppliers who undertake due diligence to guard against modern slavery and other human rights abuses.

Use our understanding of local communities/protected characteristics needs to inform partnership activities to keep communities safe:

Recognising the power of community insight, we know that their knowledge aids our ability to identify risks and emerging issues early on. This understanding is particularly pivotal for communities with diverse characteristics and those from underrepresented groups who tend to have lower levels of trust towards policing. Our strategy seeks to bridge this trust gap. By listening actively and comprehending concerns, we aim to dissolve barriers and foster relationships towards a collaborative and responsive policing service for all. Working in collaboration with the Corporation, our Secure City Programme is an example of this, delivering state-of-the-art technology upgrades to maximise safety in the square mile; keeping people safe and feeling safe. This particularly provides enhanced protection for groups who are more acutely affected by hate crime and hate incidents.

Continuing to build relationships with community groups and non-profit organisations will help us to understand and work collaboratively to keep our communities safe. This is why we have integrated our work with charities such as Mentivity and public initiatives such as our 'Walk and Talk' scheme to help provide us with continued insight into the experiences of those who tend to have lower levels of trust and confidence in the police.

Our new Neighbourhood Policing Strategy involves working with our partners and communities to prevent and reduce crime and embed long-term problem-solving solutions. In keeping our communities safe, we recognise that this is a whole-system approach. This is why working with our Business Improvement Districts as part of the Safer City Partnership, and engagement through our Dedicated Ward Panels has been such a success in delivering high quality community safety interventions for all our national and local communities.

We also recognise that our communities are continually changing. New investment and regeneration in the City will play an integral part in the Destination City vision, boosting the City's leisure offer for visitors, workers, residents and other stakeholders. Working closely with the Corporation we will continue to maintain an understanding of how we will need to adapt our policing approach to serve our existing and future communities.

Measures:

20) We have engaged and active staff Associations and Networks acting as support to our workforce and providing critical challenge to the organisation.

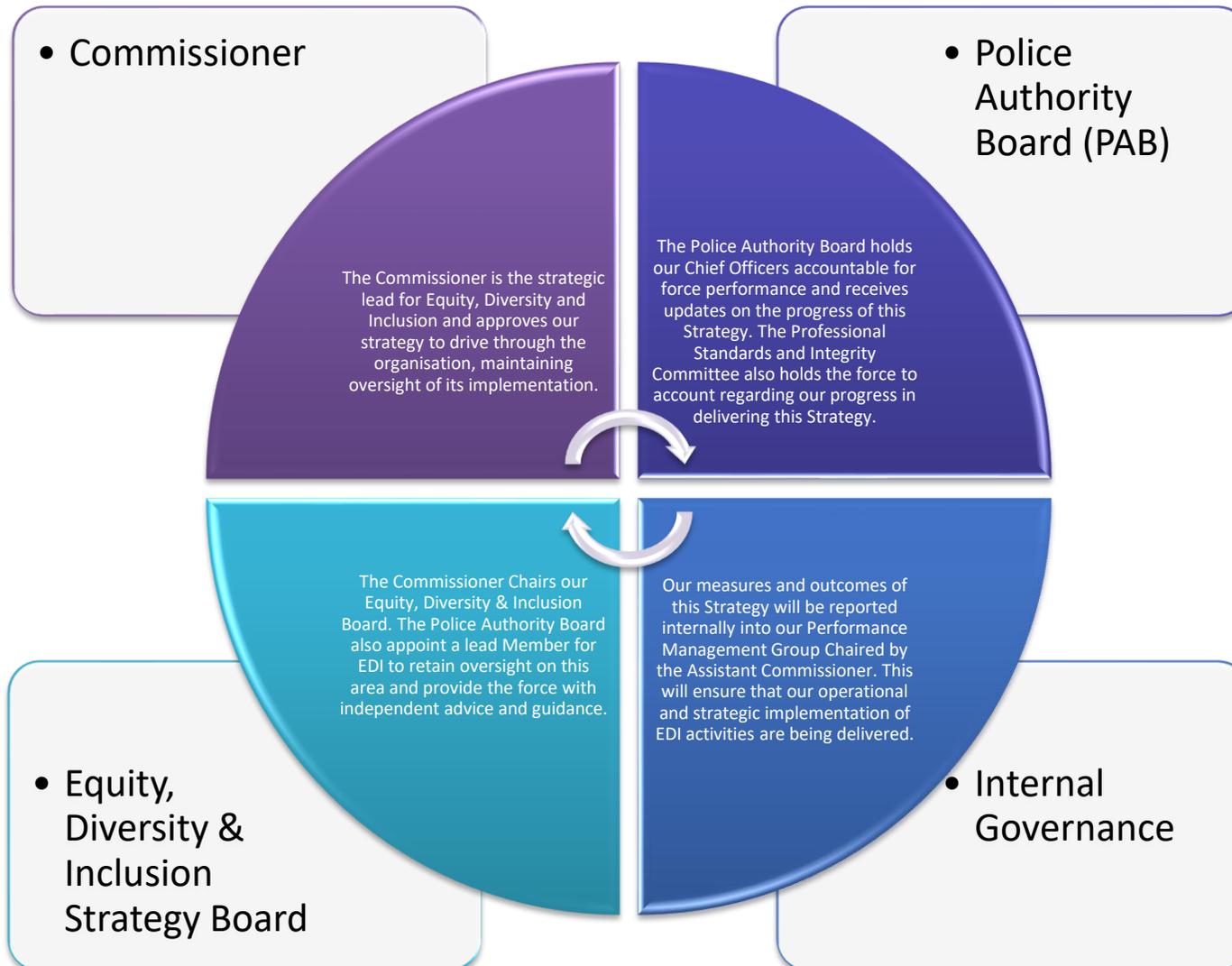
21) We support the City of London Corporation's Responsible Procurement Commitments by ensuring that EDI becomes part of our procurement assessments.

22) We demonstrate how meaningful engagement with our local communities has contributed to the shaping and influencing the outcome of force policy and activities.

SECTION 08:

GOVERNANCE AND ORGANISATIONAL PERFORMANCE AGAINST OUR STRATEGY

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Thank you!

In writing this Strategy, we are grateful to the continued support of our Networks, Associations, Diversity Champions and Community Groups who dedicate time to raise awareness of their work in Diversity, Equity and Inclusion. They also act as valued critical friends through regular conversations with our Commissioner and providing valuable advice at governance boards. These conversations help to inform the organisation on the actions we need to take to create an environment where everyone feels they belong and will guide us on our journey to become the most inclusive police service in the country.

Agenda Item 9

<p>Committee(s): Professional Standards and Integrity Committee</p> <p>Police Authority Board</p>	<p>Dated: 7 November 2023</p> <p>22 November 2023</p>
<p>Subject: Independent Advisory & Scrutiny- Update on new arrangements</p>	<p>Public</p>
<p>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</p>	<p>1- People are Safe and Feel Safe</p>
<p>Does this proposal require extra revenue and/or capital spending?</p>	<p>N/A</p>
<p>If so, how much?</p>	<p>N/A</p>
<p>What is the source of Funding?</p>	<p>N/A</p>
<p>Has this Funding Source been agreed with the Chamberlain’s Department?</p>	<p>N/A</p>
<p>Report of: Commissioner of Police Pol 114-23</p>	<p>For Discussion</p>
<p>Report author: Sanjay Andersen, Head of Professionalism and Trust Team, City of London Police, and Independent Advisory & Scrutiny Group Executive Committee</p>	

Summary

At the Police Authority Board in March 2023, a report was submitted on the review of arrangements for managing and facilitating the relationship between the City of London Police (CoLP) and the Independent Advisory Scrutiny Group (IASG). The Board was reassured by the changes being proposed but asked CoLP to provide an update back to the Board in the Autumn with a view to assessing what has worked and what has not worked, with the new arrangements of Professionalism and Trust managing the relationship with the IASG.

The report highlights key activity following the changes and outlines progress made by the force single point of contact or ‘SPOC’.

This is a joint report, whereby the IASG Executive has been invited to contribute their own update on progress since the transition and has been consulted on the full content of the report.

Recommendation(s)

It is recommended that Members note the report.

Main Report

Background

1. This report provides an update on the management of the relationship and arrangements between the CoLP and the IASG and is an update to the report provided to the Police Authority Board on the 22nd March 2023.
2. The Independent Advisory and Scrutiny Group (IASG) affords the City of London Police with independent advice from a group of critical friends from the City of London community, including members who are transient workers, residents, and from the business community. The Group provides feedback and challenge around stop and search, use of force, equality & inclusion, professional standards and are also invited to provide appropriate independent advice on Critical Incident Gold Groups on community issues.
3. Additionally, the IASG help to provide scrutiny of performance and service delivery, particularly following thematic reviews such as the PSD review of police perpetrated Violence against Women and Girls and Misogyny, and other reports of significance, such as the Child Q review presented at the IASG meeting on 27 September 2023 by the Director of Professional Standards.
4. In keeping with the City of London Police's new Policing Plan, which is focused on rebuilding trust, putting victims first, and creating an inclusive and supportive culture, and as a result of IASG feedback in January 2023 – responsibility for managing CoLP's relationship with the IASG was moved from the Local Policing portfolio to the Professionalism & Trust Portfolio. A Single Point of Contact 'SPOC' for the IASG was assigned from the Professionalism and Trust portfolio to facilitate better working with the group .

Professionalism & Trust Updates

5. Following the change to arrangements, regular monthly meetings take place between the Professionalism & Trust Senior Management Team and the IASG Executive Committee. These monthly meetings allow for issues and concerns to be raised and addressed outside of the quarterly IASG meetings.
6. The quarterly IASG meetings are held in person at Guildhall Yard East. In addition to representation from Local Policing and Professionalism & Trust, the quarterly meetings are now attended by a member of the Chief Officer Team. Attendance at meetings remains consistent, with the most recent meeting well attended. For a copy of the latest agenda, please refer to Appendix A.
7. Some IASG members have specific interests and small sub-groups have been formed for particular areas of policing. To support this, Professionalism & Trust remain the conduit for the relationship between the IASG and the relevant business area within CoLP. The IASG's Sub-Groups are:

- Counter-Terrorism
- Violent & Acquisitive Crime
- Fraud
- Vulnerable People
- Public Order
- Roads Policing
- Cyber Crime
- Hate Crime
- Stop & Search
- Use of Force

8. The most recent development with regard to the IASG's sub-groups is a refresh of CoLP liaison contacts for each area. These have been identified by position/ role, to ensure that when officers change roles or leave the organisation, there remains a consistent point of contact for each sub-group.

Other developments include:

9. A Ride Along was arranged for an IASG member with uniformed officers, as part of the training plan offered to the group. The feedback received was positive, and the attending IASG member recounted the experience as valuable and insightful into the role that police officers perform in the City of London.
10. Further assurance on IASG members' vetting statuses has been conducted, and further members of the group have been cleared for vetting. The IASG SPOC continues to engage with those members who are required to submit further documentation for their vetting applications to be completed. The group was reminded that they may attend Gold Groups for critical incidents to offer an independent perspective, should they elect to receive a higher level of vetting.
11. It was agreed that Local Policing and P&T leads will meet with the IASG to discuss necessary improvements to the stop search and use of force dip sampling process, to enable the IASG to more effectively scrutinise CoLP's use of police powers. Additionally, CoLP will facilitate sampling of uses of force including all taser discharges, any uses of taser involving juveniles, baton uses, and deployments of police dogs in a use of force capacity.
12. CoLP's Director of Professional Standards attended the latest IASG meeting to present an update regarding complaints and conduct statistics, juvenile strip searching following the Child Q report (all of which have been reported formally for Police Authority scrutiny to the Professional Standards and Integrity Committee (PSIC)), and P&T provided an update on Vetting Refusals i.e where potential recruits or applicants have failed vetting, for all new joiners and transferees from other police forces. An overview of *statistics* around vetting interviews for applicants to CoLP both during the vetting process and post vetting refusal, will be provided at the next IASG meeting in November, following interest in the number of candidates refused on the basis of family association and financial status.

13. The IASG also requested that Civil Claims against CoLP for police use of force to be shared with the group, to be reviewed and sampled as with other use of force incidents. CoLP agreed to consider this request but explained that there may be legal boundaries which prevent the sharing of these details. An update will be provided to the group at the November's IASG meeting.

IASG Update

14. Liaison has improved since the transfer of responsibility to Professionalism and Trust. The monthly meetings with Chief Superintendent in Professionalism and Trust are helpful. It is noticeable that responses and energy levels are heightened when third parties are in attendance or anticipated at the quarterly meetings e.g. Home Office, HMICFRS. However, there remains some dysfunction in the information flow including regularity of Stop and Search and Use of Force forms, misconduct update, and viewing BWV continues to be difficult to arrange owing to the necessity for IASG Members to attend in person at Bishopsgate. There is currently no option of viewing a shared screen online.
15. CoLP's response to the concerns raised are addressed in Appendix B.

Key Next Steps

16. In November 2023, the current IASG Executive Committee will step down, and job descriptions for the positions of Chair, Deputy Chair, and Secretary have been circulated to the other members of the group to register their interest to stand. Members have been advised to apply for positions by email to the current Chair with a covering note. Elections will take place at the next meeting on Wednesday 22 November 2023.
17. Following elections of the new IASG Executive Committee, a fresh recruitment programme will be conducted with support from the P&T Portfolio. Particular focus will be given to continuing to attract a diverse range of candidates.

Youth IASG (YIAG)

18. The YIAG is scheduled to have its second meeting on the 9 November 2023. At this meeting, discussion will be encouraged as to how the IASG and YIAG may interact according to each groups Terms of Reference/ Operating procedures. This will be discussed between Local Policing and Professionalism & Trust to ensure the groups operate in an effective capacity in providing suitable input and advice from a community perspective to policing in the City of London.
19. The YIAG consists of 13 Members and the age range of the group is 13-19. Since their inaugural meeting, the YIAG have not yet undertaken any IAG activities directly, however, they are currently evolving as a group so activity will take a little while to gather momentum. The specific activities of the group and the roles it will perform will be outlined at the upcoming meeting

Conclusion

20. The relationship between the City of London Police and the Independent Advisory and Scrutiny Groups continues to evolve and strengthen. As outlined in the paper, there remain areas requiring improvement but through more regular dialogue and engagement, progress is being made. The IASG and YIAG are valued groups who provide essential insight and feedback to the Force on matters impacting the community.

Appendices

Appendix A – IASG Quarterly Meeting Agenda.

Appendix B- CoLP Response to issues raised by the IASG

Contact:

T/Chief Superintendent Sanjay Andersen

Head of Professionalism & Trust

Professionalism and Trust Portfolio

City of London Police

Sanjay.andersen@cityoflondon.police.uk

Independent Advisory and Scrutiny Group Executive Committee:

Renu Gupta

IASG Chair

renugupta@hotmail.com

Godfrey Baillon-Bending

IASG Deputy-Chair

tsevniuk@yahoo.co.uk

Heather Thomas

IASG Secretary

ht@ht-consulting.co.uk

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AGENDA			
	Item	Lead / Timing (incl Qs)	Action Required
1	Welcome and apologies for absence	Chair / 5 minutes 18.05	To note
2	Minutes of previous meeting 7 th June 2023	Chair / 5 minutes 18.10	Circulated: one document to approve
3	Outstanding Actions Sheet including Group Recommendations from Reports	Chair / 10 minutes 18.20	To review: one document
4	Stop and Search	Supt Bill Duffy / 10 minutes 18.30	To review: 2 documents P&T Report and Q1 S&S report
5	Use of Force	Supt Bill Duffy / 10 minutes 18.40	To review: as item 4 above
6	Professionalism Standards Update	Professionalism and Trust Team 20 minutes 18.50	Update: 4 documents (P&T update; Child Q; Vetting Refusals; Inclusivity Programme Infographic)
7	November 2023 elections to IASG offices	Secretary / 10 minutes 19.10	To note: 4 documents (Terms of Reference; Operating Protocol; 2 job descriptions)
8	Meeting dates in 2024	Chair / 5 minutes 19.20	No document
9	AOB	Chair / 5 minutes 19.25	No document

Next meeting:

22 November 2023

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Appendix B- Issues raised by IASG and CoLP's response to these concerns.

1. *The Stop & Search records and Use of Force forms sent irregularly for review. There is a continuing absence of feedback to the comments provided.*

Local Policing have appointed a Chief Inspector to liaise with the IASG following their sampling of stop and search and use of force records. This will include commenting on the feedback provided by the IASG and updating on what has been fed back to searching officers.

2. *There is no regular misconduct update.*

Director of Professional Standards attended September's IASG meeting to provide an overview on misconduct through a PSD lens. An overview of CoLP's current misconduct investigations was provided, as well as a breakdown of the reasons for these. The misconduct process was explained, the reasoning behind lead in times, and the duality between legal and police misconduct proceedings.

3. *The question of BWV review remains outstanding.*

The method by which the group review BWV was raised at September's IASG meeting. It was agreed that Superintendent Local Policing and T/Chief Superintendent Professionalism and Trust would meet with the IASG Executive Committee to agree upon necessary process. Members of the group are currently required to attend Bishopsgate in person as there is no capability currently to share footage on a shared screen online. Legal aspects of this must also be considered.

4. *The Use of Force record in respect of taser drawn against the 'Frauditors' has been outstanding since the 20th of June.*

The IASG has indicated in their submission for this report, that they have now received the provision of Use of Force material relating to this incident and comments have been provided to CoLP by email.

5. *Timely vetting of IASG members, , continues to impair the effectiveness of the group.*

This is being actively addressed by the IASG SPOC who has reached out to individual members for further information and documentation to proceed with their vetting applications. Direction has been given that local vetting checks for IASG members are to be completed as priority applications now by the vetting unit.

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Committee(s): Professional Standards and Integrity Committee	Dated: 7 th November 2023
Subject: Q2 Stop and Search and Use of Force 2023-24	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 115-23	For Discussion
Report author: Superintendent Bill Duffy, Head of City Police Task Force & Head of Contact; Head of Sector & Response Policing	

Summary

This report covers Q2 of FY 23/24.

In this reporting period there have been 723 Stop searches with the positive outcome rate for this period 35%.

125 searches were conducted outside the Force area. These searches have been attributed to public order deployments outside City of London.

There were 0 juvenile strip searches during the reporting period.

There were 39 uses of Taser recorded this period, with none discharged. In the same period the previous year there were 28 uses of Taser with no discharges.

2 Taser incidents involved juveniles. Taser was not discharged but, in both cases, red dot¹ used.

There have been 44 searches conducted under Section 60² authority over this reporting period (Notting Hill Carnival)

There are 0 live complaints related to stop searches.

There are 4 live complaints in relation to use of force.

¹ **Red-dotted/dotting** - The weapon is not fired. Instead, the Taser is deliberately aimed and then partially activated so that a laser red dot is placed onto the subject.

² Section 60 of the Criminal Justice and Public Order Act 1994 allows Police Officers to Stop and Search a person, without suspicion and without reasonable grounds. [Criminal Justice and Public Order Act 1994 \(legislation.gov.uk\)](https://legislation.gov.uk)

The City of London Police continue to work with University of East London, the university has now agreed to conduct academic research on disproportionality

The IASG continue to dip sample Stop Search and Use of Force forms. A date is being arranged for review of BWV clips.

HMICFRS attended the CoLP Stop Search Use of Force scrutiny group, feedback on content and structure was positive.

The MPS is implementing a Pan London Stop and Search Charter. CoLP and BTP are engaged, and now working on a collaborative position.

Main Report

Current Position – Stop Search.

1. Over quarter 2 of FY 23/24 (1st July to 30th September 2023), the force conducted 723 Stop/Searches, leading to 173 arrests. Overall, the positive outcome rate for this period was 35%. This compares to 604 stop/searches leading to 154 arrests in the same period in FY 22/23. (11% decrease in arrests)
2. In the adult population most searches were conducted for drugs (42.46%), with 17% of the population being searched for going equipped etc. This is in line with the established trend, which sees most searches overall being conducted for drugs, but within the juvenile cohort the main reason for searches being going equipped and drugs.
3. For City of London Police, there have been 44 searches conducted under s.60 authorities over this reporting period and s.60 authorities have been granted. This compared to 0 search conducted in the same period in FY 22/23. All these section 60 searches have been conducted outside the force area. These were conducted during Public Order deployments at the Notting Hill Carnival. The section 60 was based on information and intelligence of gangs entering the footprint with weapons.
4. Over this reporting period 65 juveniles (<10-17yrs>) have been searched, data shows this spike is in line with the deployments of Public Order officers to Notting Hill Carnival and spontaneous disorder at an event within the City.
5. Of these juvenile searches, the majority 26% were searched for going equipped. In contrast, in the adult population most searches were conducted for drugs 40%, with 14% of the population being searched for going equipped. This is in line with the established trend, which sees most searches overall being conducted for drugs, but within the juvenile cohort the main reason for searches being going equipped and possession of drugs.
6. For the current reporting period, the disproportionality for black members of the community was 2.4 (compared to 2.6 in the comparator period). This is within the established trend of between 1.9 and 2.5 over the preceding two years and is a reduction on Q1.
7. To understand disproportionality within CoLP the force has approached University of East London to conduct academic research. Initial discussion has taken place, and this has outlined several areas for research. Linked to this the National Stop Search working group (NPCC and knowledge hub) are also undertaking a review of proportionality. The aim is to develop a more accurate mechanism to understand disproportionality. CoLP attend the National Working Group.
8. The MPS have formed a Stop Search Working Group to explore a Pan London stop and search charter. The aim of this is for London communities to agree how stop and search can be delivered. London communities have identified the

following issues – rudeness, adequate explanation of why the search is being carried out, an apology when nothing is found, a significant imbalance of information (delivery of GOWISELY³) and an ability to understand what an individual's rights are. This is being developed over a number of years. CoLP has joined the working group and will be arranging a briefing with the IASG and any other interested parties.

9. Of Black individuals stopped, the majority (39.29%) were searched for drugs, which is broadly in line with the adult population, whilst 23% were searched for going equipped etc., which is slightly higher than the adult population. However, this is a decrease on the same period last year, where 53% of black individuals stopped were searched for drugs, with a 40% positive outcome rate (and 28% arrested). In contrast for this reporting period there was a 46% positive outcome rate (and 36% where arrested). Slightly fewer black members of the community were stopped in this reporting period 56 compared to the previous year (60).
10. For Asian individuals, the disproportionality has decreased from 1.3 in the comparator period to 0.9 in this reporting period. Most Asian individuals searched (62%) were searched for drugs, which is at odds with the adult population.
11. Searches under s.23 of the Misuse of Drugs Act continue to account for most stop/searches, in line with the established trend. Searches under this power have an average positive outcome rate, with items being found in 40% of searches (drugs being found in 39% of searches and other items in 1%).
12. **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) may be 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.
13. 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 practice 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).

³ GOWISELY is an acronym used by police officers as an Aide Memoire for the information they are supposed to give a stop and search subject before commencing the search to ensure compliance with Code A of the Police and Criminal Evidence Act (PACE)

14. As set out in our Q4 FY22/23 report, we will report on Strip/Searches in each of our reports to this committee.
15. Over this reporting period we conducted 17 strip searches, of which 1 constituted a more thorough search and 16 an intimate parts exposed search (this compares to 19 in the comparator reporting period, of which 1 was a more thorough search and 18 intimate parts exposed).
16. The majority of strip searches, 12, were conducted under Misuse of Drugs Act powers, with 4 being conducted where the subject was thought to be going equipped or in possession of stolen goods.
17. 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.
18. **Juvenile Strip Search.** No under 18s were strip searched in this reporting period. As previously reported to the Committee, we will supply detail of any U18 strip searches in this report if any are conducted.
19. **Dip Sampling.** The Force introduced a revised Standard Operating Procedure for the dip sampling of Stop/Search records in November 2021.
20. In June 2022 we introduced a change in the dip sampling process, requiring supervisors to rate each record they reviewed on a scale from 1 to 10. The scale is set out below.
 - 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.
21. Over this reporting period the force has recorded 723 Stop/Searches, and we have internally dip sampled 146 of these: a sample rate of 20%. Within this period the governance dip sampling has reviewed 33, 22% of the dip sample.

IASG (Independent Advisory and Scrutiny Group) DIP Sampling:

22. The IASG continue to dip sample Stop / Search and use of force forms, in this period they have reviewed 45, from that one officer has been reminded about the

activation of BWV (Body Worn Video) and the input of data now includes identification of an incident to link the search.

23. City Force Operations Manager is reviewing the dip sampling reports from IASG and some common themes identified are:

Common themes this time;

- Use of force reports where applicable are now being supplied with stop search forms.
- Timings have been highlighted on reports. This has been fed back to individual officers. The timings show the forms being completed after the search. PACE code A states that officers, must make the record on the spot unless this is not practicable to do so.

24. The IASG is working on dates to attend COLP and view selected BWV footage and provide feedback. This is currently the only way they can view it.

University East London (UEL) Student Scrutiny:

25. There was second attendance from UEL students on 7th of June 2023- as part of continuing collaboration with City of London Police • reviewed Stop/ Search BWV footage video which included a Taser challenge, group discussions outlined police information, police actions and group views captured.

26. The next date for UEL students' attendance as part of continuing collaboration with the City of London Police is the 20th of October 2023 – for facilitated discussion on a variety of BWV footage scenarios.

Use of Force

Current Position –

27. Over this reporting period, a total of 1085 uses of force were recorded, the spike in high number of use of force is related to Notting Hill Carnival and spontaneous disorder at an event in the city. This is compared to 776 over the same period last year. (increase of 39%). In this reporting period, 56.68% of uses of force involved arrests, compared to 41% in the same period last year, and handcuffing remains the largest single use of force by a large margin.

28. Over this reporting period, batons have been used 46 times⁴ and police dogs been deployed 4 times. On all 4 occasions, intel/ information indicated a weapon may be present. In this reporting period 11 PAVA⁵ drawn with 1 irritant spray PAVA discharged. Use of PAVA due to intel/ information indicated a weapon may be present, missile/object thrown, blunt weapon/object present.

⁴ Use of batons due to intel/ information indicated a weapon may be present, missile/object thrown, blunt weapon/object present.

⁵ PAVA- irritant spray

29. A total of 4 officers were injured in incidents involving the use of force, with minor injury detail and with no medical assistance provided (7 in Q1 22/23) and 16 subjects were injured because of the use of force (17 in Q1 22/23).
30. Force remains most used against male subjects (83% this reporting period compared to 78% in the comparable period FY22/23).
31. Disproportionality for Asian subjects in use of force has changed to 0.9 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 2.4 in this reporting period.
32. **Taser.** Over the reporting period the Force recorded 39 uses of Taser, 2 x aimed , 7 x drawn , 30 x red dotted and 0 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.
33. Of these 39 Taser incidents, 2 involved Juveniles. Taser was available at the scene but never fired.

Conclusion

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

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

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