



Professional Standards & Integrity (Police) Committee

Date: TUESDAY, 27 FEBRUARY 2024
Time: 1.45 pm
Venue: COMMITTEE ROOMS, GUILDHALL

Members: Michael Mitchell (Chair)
Alderman Professor Emma Edhem (Deputy Chair)
Deborah Oliver
Nicholas Bensted-Smith
Tijs Broeke
Deputy James Thomson

Helen Fentimen
Jason Groves
Florence Keelson-Anfu
Joanna Tufuo Abeyie
Naresh Hari Sonpar

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<https://www.youtube.com/@CityofLondonCorporation/streams>

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Whilst we endeavour to livestream all of our public meetings, this is not always possible due to technical difficulties. In these instances, if possible, a recording will be uploaded following the end of the meeting.

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 summary of the meeting held on 7 November 2023.

For Decision
(Pages 5 - 10)

4. **PUBLIC OUTSTANDING REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 11 - 12)

Section 1 - Equity, Diversity and Inclusion

5. **EQUITY, DIVERSITY AND INCLUSION UPDATE**

Report of the Commissioner.

For Information
(Pages 13 - 32)

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

Report of the Commissioner.

For Information
(Pages 33 - 74)

Section 2 - Stop and search and use of force

7. **QUARTERLY STOP AND SEARCH AND USE OF FORCE UPDATE (Q3)**

Report of the Commissioner.

For Information
(Pages 75 - 82)

Section 3 - Professional Standards and Complaints

8. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE - Q3**

Report of the Commissioner.

For Information
(Pages 83 - 110)

9. **COLLEGE OF POLICING'S CODE OF PRACTICE FOR ETHICAL POLICING - 'THE CODE OF ETHICS' IMPLEMENTATION AT CITY OF LONDON POLICE**

Report of the Commissioner.

For Information
(Pages 111 - 124)

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

Report of the Commissioner.

For Information
(Pages 125 - 128)

11. **ACTION FRAUD COMPLAINTS Q3**

Report of the Commissioner.

For Information
(Pages 129 - 148)

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

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

14. **EXCLUSION OF THE PUBLIC**

MOTION – that under Section 100 (A) of the Local Government Act 1972, the public be excluded from the meeting for the following items 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

15. **NON-PUBLIC MINUTES**

To approve the non public minutes of the Professional Standards and Integrity Committee on the 7 November 2023.

For Decision
(Pages 149 - 150)

16. **CITY OF LONDON POLICE HISTORICAL DATA WASH**

Report of the Commissioner.

For Information
(Pages 151 - 160)

17. **MISCONDUCT CASES- DIP SAMPLES**

Report of the Commissioner.

For Information
(Pages 161 - 186)

18. **NON PUBLIC APPENDIX - PROFESSIONAL STANDARDS, CONDUCT AND VETTING**

Report of the Commissioner. To be read in conjunction with item 8.

For Information
(Pages 187 - 194)

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

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

PROFESSIONAL STANDARDS & INTEGRITY (POLICE) COMMITTEE Tuesday, 7 November 2023

Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Tuesday, 7 November 2023 at 11.00 am

Present

Members:

Michael Mitchell (Chair)
Deborah Oliver
Tijs Broeke
Jason Groves
Florence Keelson-Anfu
Naresh Hari Sonpar

Officers:

Richard Riley	- Police Authority Director
Charles Smart	- Police Authority
Rachel Waldron	- Police Authority
Ben Dunleavy	- Town Clerk's Department

City of London Police

Paul Betts	- Assistant Commissioner
Sanjay Andersen	- City of London Police
Neal Donohoe	- City of London Police
William Duffy	- City of London Police
Carly Humphreys	- City of London Police
Kate MacLeod	- City of London Police
Hayley Williams	- City of London Police

1. APOLOGIES

Apologies for absence were received from the Deputy Chair, Nick Bensted-Smith, and Deputy James Thomson.

Helen Fentiman and Joanna Abeyie observed the meeting virtually.

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

There were no declarations.

3. MINUTES

Tijs Broeke noted that his apologies for the last meeting were not included on the minutes.

Following this amendment, the public minutes and non-public summary of the meeting held on 15 September 2023 were approved as a correct record.

4. **REFERENCES**

Members received a joint report of the Town Clerk and the Commissioner.

RESOLVED, that – the report be received, and its contents noted.

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

Members received a report of the Commissioner concerning statistics on action fraud dissatisfaction.

During discussion, the following points were noted:

- A Member requested that future reports include more information on the trends over time.
- At the request of a Member, officers undertook to arrange a background briefing note on the thresholds under which fraud investigations would not be taken forward.
- The Chair asked Members to consider whether the Committee was the appropriate forum in which to discuss the dissatisfaction data for Action Fraud, with a Member noting that it used to focus on the handling of complaints around Action Fraud.

RESOLVED, that – the report be received, and its contents noted.

6. **NOTIFIABLE ASSOCIATIONS - UPDATE**

Members received a report of the Commissioner concerning notifiable associations.

Members welcomed the work done by the City of London Police to increase their transparency. They asked if it would be possible for the list to be made more widely available, and officers undertook to consult further to agree a way forward. Members also asked if an annual report of officer associations could be produced for the Committee, which the City of London Police agreed to consider.

In response to a question from a Member, the Town Clerk confirmed that registers of interests for External Members of City of London Corporation Committees, including those serving on the City of London Police Authority Board and its sub-committees, should be publicly available.

RESOLVED, that – the report be received, and its contents noted.

7. **QUARTERLY EQUALITY AND INCLUSION UPDATE**

Members received a report of the Commissioner concerning equality and inclusion.

Members congratulated officers for the progress demonstrated in the report.

Members noted that officers aimed to have a one-page dashboard capturing the key points on evaluation and reporting, and the Chair requested that this be ready for the Committee's February meeting.

RESOLVED, that – the report be received, and its contents noted.

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

Members received a report of the Commissioner concerning the City of London Police's Equity, Diversity and Inclusion Strategy.

It was strongly felt by Members that the proposed strategy would benefit from greater scrutiny and input before it was submitted for final approval. Officers confirmed that there was more work that could be done on the Strategy and would return to the Committee with a further draft to February PSIC before it was presented to PAB.

During discussion, Members considered how the Strategy represented the populations of London. Some Members felt that it should reflect London as a whole, while others felt that it should address the distinct needs of the population of the Square Mile i.e. the City's 650,000 worker population, and its resident community.

A Member suggested that officers should use the Strategy as a chance to connect with the staff networks of employers in the City, which they felt would help in reaching an integrated model and enhancing community engagement. The City Belonging project was highlighted as a useful partner.

A Member asked that the Strategy acknowledge the context of the Casey Review.

The Chair noted that two specific questions need to be addressed – the issues the strategy seeks to address, and the resources available to it.

RESOLVED, that – the report be received, and its contents noted.

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

Members received a report of the Commissioner concerning arrangements for independent advisory and scrutiny groups.

A Member expressed their concern at vetting delays for new members of the groups. In reply, officers acknowledged that there could be delays in the vetting process, particularly if something had come up during the due diligence checks as part of the vetting and undertook to raise it at a future meeting of the groups in order to manage expectations.

Members sought assurance that the groups would not lose experience due to the three Members whose terms were coming to an end. Officers confirmed

that one of the Members would be standing for re-election. Members suggested that Corporation networks could assist with advertising Group vacancies, which City Police agreed to explore.

A Member, also the Deputy Chair of the City Corporation's Education Board, suggested that officers could look to the City Corporation's family of schools to help recruit to the Young Independent Advisory Group.

RESOLVED, that – the report be received, and its contents noted.

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

Members received a report of the Commissioner concerning stop and search and use of force.

The Chair requested that officers return with an analysis of whether stop and search training had led to more positive responses.

RESOLVED, that – the report be received, and its contents noted.

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

There were no questions.

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

There was no urgent business.

13. **EXCLUSION OF THE PUBLIC**

14. **NON-PUBLIC MINUTES**

The non-public minutes of the meeting held on 15 September 2023 were approved as a correct record.

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

Members received a report of the Commissioner concerning professional standards.

The meeting was extended under Standing Order 40.

16. **MISCONDUCT CASES- DIP SAMPLES**

Members received a report of the Commissioner concerning misconduct.

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

There were no questions in the non-public session.

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

There was no urgent business in the non-public session.

The meeting ended at 1.08 pm

Chairman

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PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

PUBLIC OUTSTANDING REFERENCES

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	Complete -Trends from the previous quarter are included in the new report format.
7/2023/P	7th November Item 5- AF Statistics	At the request of a Member, officers undertook to arrange a background briefing note on the thresholds under which fraud investigations would not be taken forward	Commissioner	Complete - Note sent to Clerk on the 8/2/24 to circulate to Members of PSIC. Confirmed sent to Members on the 8/2.
8/2023/P	7th November Item 7 Quarterly Equality and Inclusion Update	Members noted that officers aimed to have a one-page dashboard capturing the key points on evaluation and reporting, and the Chair requested that this be ready for the Committee's February meeting	Commissioner	In Progress - This remains a work in progress, with a focus on developing the proposed measures for evaluating progress, which are included within the draft Strategy on the agenda. Once the measures have been agreed, we will work with relevant departments internally to ensure that a dashboard is produced to support reporting requirements.
9/2023/P	7th November item 8 EDI Strategy 2024-27	Officers confirmed that there was more work that could be done on the Strategy and would return to the Committee with a further draft to February PSIC before it was presented to PAB.	Commissioner	Complete -The EDI Strategy is presented on this agenda.

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Agenda Item 5

Committee(s): Professional Standards and Integrity Committee	Dated: 27 February 2024
Subject: Equality, Diversity, Inclusivity Update	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1- People are Safe and Feel Safe
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Commissioner of Police Pol 30-24	For Information
Report author: Kate MacLeod, D/ Supt, Professionalism and Trust	

I. Summary

Force engagement continues on key Equity Diversity and Inclusivity (EDI) strands, current focus in particular is on the Race Action Plan and ensuring we build on momentum from November’s launch, workshops arranged for later this quarter will help further cement roles and responsibilities with our leadership team. Competing action plans and priorities across a number of EDI areas continue to place additional demand on our leadership. As well as addressing this, a focus in this reporting period has been work to inform the establishment of a refreshed EDI Governance and internal scrutiny framework that better reflects the maturing nature of this portfolio.

The team have worked hard to produce our first evaluation paper of our Inclusivity Programme, incorporating views from Committee members, next steps focus on capturing longer-term behavioural change.

Two significant pieces from the College of Policing are the recent roll-out of the new Policing ‘Codes of Ethics’ and the ongoing development of the National Leadership Programmes. Our proposal on the latter will be a significant opportunity for the force; a deliverable intrinsically linked to the start of PEEL 2025, our response to Staff Survey and our EDI Strategy launch.

The EDI strategy (as per separate paper) is nearing finalisation having captured a range of inputs internally and externally. Once finalised the success measures will be monitored by Professionalism & Trust and form part of the performance framework being evolved and reported against.

II. Evaluation of Our Inclusivity Programme

Taking on feedback from our Members, the team has produced their first evaluation of the Inclusivity Programme and very much welcome further feedback from Members as this evolves. The full document can be found at Appendix A, with Compliance data at Appendix B.

Our Inclusivity Programme is an attempt to deliver awareness training to all of our officers and staff across areas of Equity, Diversity and Inclusion. However, instead of mandating classroom-style delivery, individuals are encouraged to choose from a range of modules according to their learning style and knowledge gaps. This allows us to move away from what could be perceived as a 'tick box' exercise to something which holds real meaning for those attending.

Modules evaluated this quarter are below, key evaluation points follow thereafter:-



- We know that 1,263 courses have been attended, 1,622 employees are eligible to undertake a module.
- For each module, 100% of respondents said that they would recommend to others.
- Quick time feedback has allowed us the opportunity to tweak delivery whether this be length of session, changes to content and so on.
- Some of the value of these sessions is simply not quantifiable- the quotes provide really valuable feedback which should still be captured.
- Once our EDI reporting dashboards are in production, we will also be able to look at other data (across areas such as recruitment, retention, promotion, standards of behaviour and so on) to assess what impact the Programme is having on force culture more widely. We understand this piece is vital.
- 'Next steps' have been noted for each module. We now need to ensure that we are messaging this back to our workforce so that they can see the value in providing feedback and some tangible action being taken as a result- a 'you said – we did' approach may work well.
- More generally, we need to improve feedback response rates in some areas (i.e. 17% completion for Mentivity), we have found that taking time to personally email respondents has already seen improvements.

III. EDI Dashboard

The EDI Strategy 2024-27 is an updated draft and is also an item on the agenda today for information., The proposed measures for evaluating progress, which are included within the draft, are still in development and undergoing consultation.

Once the measures have been agreed, we will work with relevant departments internally to ensure that a dashboard is produced to support reporting requirements across different governance platforms. This will provide a current force picture of where we are with reporting measures and rolling quarter-by-quarter updates.

IV. Key issues, risks, and mitigations

Resourcing and Demand

Owing to temporary abstractions there is still considerable demand on the remainder of the team. Efforts are being made to backfill where appropriate.

We have also recruited into one of the vacant PC posts and are awaiting their release (planned for March 2024). We need to progress recruitment of the additional PC/s.

Finally, we are awaiting the results of the current Chief Inspectors Promotion Process and decisions on the postings which will follow and allow us to fill this vacancy (posting expected early April 2024).

Force Engagement on Police Race Action Plan ('PRAP') and Wider EDI Governance

The PRAP provides a real opportunity for every force in the UK to commit to change in this really important space. However, Nationally it is clear that the plan has not been as developed as fully as the programme team has initially envisaged, there remains a real risk that this is not getting the traction it requires.

In completing our launch event in November 2023, we were able to send a clear message to our teams that we are prioritising action to ensure that black people are represented in our work force, not over-policed, are involved and not left under-protected. As a force, we have worked with our networks and associations to prioritise a range of actions under each of these pillars.

We continue to receive feedback from the 'online' version of our launch event; it is clear that the majority of our workforce who have attended are understanding the need for a Plan. However, the issue we have is how we inject this enthusiasm and maintain momentum with our leaders across the force, appreciating the many other competing priorities and demand from what is perceived as 'business as usual' v's

'additional work'. Dr Angela Herbert attended a Senior Leaders Forum back in July '23 where she explained that our 'PRAP' is a priority for ALL departments and not just for Professionalism and Trust; with so many actions to be completed within different specialism, it needs to be force effort and thread that runs throughout each team's plans of work.

A workshop took place with Professionalism & Trust leadership and Dr Herbert earlier in January with a further session in early February. The aim of these is to finalise next steps for PRAP, we have agreed to hold further sessions with our Senior Leaders in early March, the planned outcome from these is to:-

- Agree on ownership of actions across the force
- Gain an understanding of what support is required from Professionalism & Trust
- Convey clear mechanisms to hold people to account for their actions within wider EDI governance.

We will also be launching our Sponsorship Programme for Black and Asian colleagues later this month, a key deliverable for our PRAP, uptake will be reported at the next Board. The Chief Officer Team are supporting this initiative as sponsors.

International Conflict in the middle east and Impact on CoLP

We know that there have been increasing concerns that Jewish and Muslim communities are feeling unsafe and that the coverage of the conflict in Gaza is impacting on their wellbeing, daily movements, and feelings of overall safety. Police engagement with these communities suggest that this sentiment is also evident in the City. To support this, there has been increased engagement, taskings and dedicated operations to monitor and provide extra support. A review is currently underway to ascertain whether we have seen an increase in antisemitic crime since events of October last year.

Internally, we have created a rolling log for the conflict to provide our people with relevant messaging and signposting for those requiring further assistance. Professionalism and Trust have offered to host private conversations with anyone feeling particularly concerned; 3 such approaches have been made. We are also in regular conversation with members of our Association of Muslim Police, appreciating that they are in a transitional period due to the departure of previous Executive Committee members. To bridge this gap, a series of workshops have taken place to talk through future ways of working and provide ongoing support. Elections are planned for the first quarter of this year and internal communications publicising this have been circulated.

As part of our Inclusivity Programme we have led two sessions for our officers and staff to help them better understand the Jewish faith and recognise antisemitic crime, these have been delivered by the Community Services Trust (CST). Over 60 officers attended a face to face briefing in January, with an online version planned for later this month. We also had representation from the Corporation. Next steps are to ensure that our communities are getting the same reassurance

and signposting. Professionalism and Trust are also working to ensure that inputs are provided on islamophobia and protecting victims of anti-muslim hate, to ensure a balanced approach.

V. Notable national issues and developments

National Violence Against Women and Girls Programme Changes

As of 7th November 2023, ACC Samantha Millar QGM, has taken over as the Strategic Programme Director for the National Police Chiefs' Council Violence Against Women and Girls (VAWG) Taskforce. ACC Millar had previously been the Programme Lead for the Taskforce under DCC Maggie Blyth since early 2022.

ACC Millar is responsible for leading the team, which is delivering Policing's National focus on VAWG, DCC Maggie Blyth, who is the Deputy CEO of the College of Policing, continues to be the NPCC lead for VAWG. However, her role is now primarily focused on ministerial and parliamentary engagement, she will continue to update via Chiefs' Council.

A list of National dates and workshops for 2024 has been distributed; of note for us as a force are the publication of the framework for delivery 2024-2027 and self-assessment which we have in our calendars to complete and will bring any areas of note to this board. The Nationally mandated action plans are now moving from a '3 pillar' to a '4 P (Prevent, Prepare, Pursue, Protect) template, which Professionalism & Trust will review and adopt ahead of HMICFRS inspections.

National Police Race Action Plan Update

As Senior responsible Officer for the National PRAP, Chief Constable Gavin Stephens has recently underlined his role in providing an inclusive environment where colleagues can share views, so we can understand each other and agree action "We have unanimously agreed that we have a duty to improve policing for Black people by becoming an anti-racist police service".

There is a new reiteration of the plan coming in summer 2024 which will likely not be greatly different from the current version. Of note, a benchmarking / maturity matrix is being designed for completion by all forces. CoLP continue to have regular engagement with the National PRAP team, we were fortunate that strand leads attended our launch event and continue to request more detail on our insights and experiences.

Launch of new Policing Code of Ethics

Last month, the College of Policing launched the new Code of Ethics for Policing, this is being led internally by T/Commander Rob Atkin. The new Code reflects the challenges of modern-day policing whilst outlining the professional behaviours that the

public can expect from officers, staff and volunteers. This is subject of a separate detailed report on this agenda.

The nine principles from the 2014 Code of Ethics have been mapped into three principles that are easier to remember and apply:-



To help our officers and staff understand why these changes have been made, a series of guidance tools (including videos) have been circulated to set out what ethical and professional behaviour looks like on a day-to-day basis. These align well with our force values of professionalism, integrity and compassion.

Over the coming months, we are working hard to embed the new Code in all our work and policies, with a working group already established to drive this forward. As part of our Inclusivity Programme, we have an 'ethical dilemmas' module which helps to bring scenarios to life and is an ideal opportunity to test our understanding of the new Code.

VI. Forward look

Leadership Programme

The College of Policing has now launched their 'National Centre for Police Leadership' (NCPL) which aims to support forces to deliver the police leadership programme. This will help to deliver a consistent standard of leadership development for each stage of a career in policing.

As a force, we are working hard on our delivery plans for this new model and in early February are working with our Chief Officer Team to gain a joint understanding of our vision. The first stage of the programme is already being delivered through our new entry routes within CoLP, stage two will be rolled out nationally later this

year. Each programme will be delivered in force but with support and quality assurance by the College to ensure that a core suite of standards and requirements are met and maintained.

'Stage two' of the programme is specifically for first line leaders. This includes Police Constables, Sergeants, Police staff and volunteers who are keen to develop their leadership skills in their current roles, as well as those seeking promotion.

This stage of the programme is designed to equip colleagues with the skills they need in their role. This is whether they're the first officer on scene at a homicide, taking ownership of a crime scene, leading a complex domestic harassment investigation or anything in between. The team are viewing this as a real opportunity to deliver something meaningful to our force; timing is critical in that we are soon expecting results of our recent staff survey, it is important that whatever we deliver takes into account these results as well as the vision from our Chief Officer Team.

Staff Survey and Cultural Audit

Work continues on our cultural audit, we are currently at the design stage and awaiting results from our Staff Survey. We plan to roll out the pilot to 4 teams in March, current activity is focused on arranging briefings for our network leads, union, federation and so on.

The ultimate aim of this audit is to uncover elements of hidden culture which impact on how people feel at work (low level type of behaviors not reaching misconduct). The work involved to deliver this piece is considerable, it is currently being progressed, but two individuals with other competing priorities. Hence careful planning is critical in ensuring progress continues at a steady pace.

Visit from College of Policing SLT

A senior delegation from the College of Policing will be visiting CoLP on 25th April 2023 to talk through the work underway so far, future workplans and just to gage general feeling on where we are in this space as a force. We know that the College have highlighted much of our work as 'best' or 'innovative' practice and regularly seek feedback from them as specialists in their field; we want to ensure that this working partnership continues.

Inclusive Employers Accreditation

We previously invited Inclusive Employers to assess our work against their Inclusion Maturity Model back in 2020, where we were rated as 'Compliant'. Aligned to the launch of the refreshed Equity, Diversity & Inclusion Strategy, we will be undergoing a new assessment to independently assess our 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'.

Inclusion Maturity Model



The window for submissions to Inclusive Employers opens 6th March this year and closes in May. We are working closely with the organisation to ensure we maximise this opportunity and that our submission showcases all that we do as a force. They are not able to give an exact date for results but will probably be looking at August / September.

Conclusion

There is a breadth of work going on in this area of business as illustrated in this regular report to your Committee.

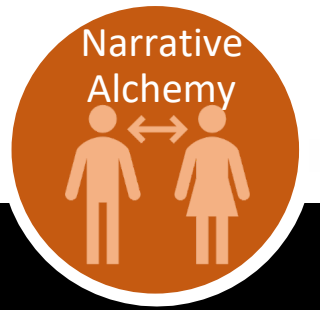
Appendices

Appendix A- Inclusivity Programme Evaluation

Appendix B- Inclusivity Programme Evaluation Compliance data

Kate MacLeod
D/Superintendent
Professionalism and Trust

Our People - Inclusivity Programme modules - Oct-Dec 2023



Interactive Workshop focusing on sexism, misogyny & violence

4th Dec – 2 sessions

In person event

25 attendees

9 staff /16 officers

15 female/10 male

Further sessions to be delivered in Feb 2024

Focus on... 'BE LADS' campaign with Poppy Murray

30th Nov – 1 session

Virtual event

100 attendees

Further session due early 2024 focusing on the Jewish Community

Gaining the tools and confidence to call out and challenge inappropriate comments and behaviour

14th Dec – 1 session

In person Event

9 attendees

Further sessions to be delivered in January 2024

Challenging scenarios to discuss and debate

15th & 17th Dec – 2 sessions

In person Event

Further sessions to be delivered in 2024

Raising awareness & understanding within communities

6 participants

On going modules that can be undertaken throughout the year

An insight into young Black people's experiences with police

26^h Oct

In person event

36 attendees

Part of new student officer programme

CoLP Race Action Plan Launch – 20th November 2023
In person event – 150 attendees

Narrative Alchemy



Feedback return 48%

100% stated they would recommend this module to others

Positives

Interactive session on an interesting subject
Different approach to training makes it more engaging
Delivery from skilled external partners makes a refreshing change
Informal, casual style of learning and environment
Maturity and mutual respect from all involved

Core Learning Quotes

"I am not alone in my experiences."
"The actual meaning of sexism."
"The impact on victims when this is not challenged."
"Technique of retelling the stories of others."
"Importance of other perspectives."

Other comments

Continue this style of learning with different topics
Make the sessions longer
More role plays



Steps taken following feedback

Future sessions arranged for 8th February 2024

Increased these from 2 sessions to 3 with an increase in length from 1hr 15mins – 1hrs 45 mins

Feedback debriefed with delivery company and changes made to ensure scripted actor roles are more role play based then individual scenarios

Focus on



BE LADs with Poppy Murray

Sept session – 143 attendees

Nov session - 80 attendees

12% feedback return with 100% recommending others attend

Core Learning Quotes

“I am conscious as a man of the impact factors that may have caused women anxiety in certain circumstances.”

“We should all be aware of how we might be perceived to others in all types of environments.”

“The level-headed, non-demonising approach, helping all to understand and empathise.”

“I have shared this with my 19year old Daughter for personal safety and probably that I may have more awareness as a father already.”



Find your why: a journey from diversity to belonging, by Asif Sadiq Chief of Global Diversity, Equity and Inclusion at Warner Bros

Sept event - 112 attendees

22% feedback return with 100% recommending to others

Main Learning Quotes

“Value to the position of officer and inspirational to see where it can lead.”

“Importance of believing in your worth and using your life experiences.”

“Relatable to officers and staff as his journey started as an officer in CoLP.”

Future sessions arranged for Jan 24

In person & virtual sessions delivered by Community Security Trust (CST), a charity that protects British Jews from antisemitism and related threats.

Aimed to promote good relations between the Jewish Community and police, providing officers practical tips and tools to effectively combat bias, antisemitism and understand the impacts of these behaviours.

BE LADs – Future session confirmed for March 24

Active Bystander



Feedback return 89%

100% stated they would recommend this module to others

Positives

Use of scientific studies
Group interaction and discussions
Good quality delivery and trainers
Encouraged attendee participation

Core Learning Quotes

"The effectiveness of learning to deal with matters directly and timely."

"Importance of early intervention on potentially inappropriate behaviour/comments."

"How I can make a change within the work force."

"Various options for challenging behaviour. Needn't be there and then (when appropriate)."

"How to spot the early signs of bad behaviour."

Other comments

It may be helpful to have a practical element to the training to demonstrate the skills we were taught.

Make this mandatory for all.

Steps taken following feedback

Future sessions arranged for January, February & March 2024

Feedback has been debriefed and delivery style varied accordingly

Ethical Dilemmas



Feedback rate 17%

100% would recommend to others

Positives

Group working and discussion
Time out to reflect on personal decision making
Variety of attendees made this more interesting

Core Learning Quotes

"Importance of looking at other perspectives when making decisions and communicating rationale."
"Make less assumptions when dealing with staff issues."
"Tools to use when faced with complex situations."

Other comments

Delivery style and content, aimed at the right level
An ice breaker could help at the beginning of the sessions to make attendees more comfortable



Steps taken following feedback

Future sessions arranged for February 2024

Feedback has been debriefed and slight changes may be made to future sessions such as adding an ice breaker and increasing group discussion

Community Initiative



This module focuses on the community and encourages officer and staff to be creative and take opportunity to become involved in different communities and feed back into their line management as to what they chose to do, why they chose to do it and share their learning and experience.

We have had 6 people choose to take part in this module and have seen a variety of community engagement, predominantly with the younger generations.

Below is a summary of activities that took place;

- **Careers talk at a school for autistic people**
- **Pre-school talk to children on how and when to call 999**
- **Police input to the air cadets**
- **Year 8 careers talk**
- **Fraud/cyber-crime input to children with learning difficulties**



Steps taken following feedback

We plan to continue to offer this as a module choice and to encourage participation and share learning, we may share staff experiences via internal communications.

Mentivity



26th Oct 23 – 35 attendees

Core Learning Quotes

- “I actively encourage everyone to do this training. The input is really interesting and not what you think it will be. This was the most impactful and useful diversity training I have ever received.”
- “I would highly recommend this session. Opened up healthy discussions around race in policing and gave a lot of insight on people's experiences that would otherwise be difficult to speak about.”
- “I have first-hand policing experience from front line London Boroughs so approached this with a high degree of scepticism. However, I am very pleased to say that I found it both enlightening and challenging to my own held views. This is a very good thing to attend, and I recommend it to all Officers intending to have a long-term career in policing.”



Steps taken following feedback

Future sessions arranged for 2024

These sessions are also part of the new student officer induction programme

PRAP Launch



Feedback return 35%

100% stated they would recommend this module to others

Positives

Subject matter experts added value

Interesting and thought-provoking talks

Commitment to the race plan evident through visible senior leadership present

Well organised event, approachable team

Different from past events, more authentic and believable

Core Learning Quotes

"Venue was not overly accessible."

"The event could have been longer."

"Teddy Burton's talk was interesting but too long and detailed for this event."

Other comments

Positive to see a variety of people attend the event

Nice venue and welcoming team

Enjoyed the time to network



Steps taken following feedback

Dr Angela Herbert, as a critical friend is helping to shape internal plan into action through a coaching and advising capacity.

Virtual recording of event can be viewed via the intranet and is mandatory for all.

Priority areas have been identified and further prioritised to ensure effective delivery.



INCLUSIVITY
PROGRAMME

COMPLIANCE

LAUNCH -
PRESENT

725 Focus On Sessions

698 Inclusivity Launch

150 PRAP Launch

95 Mentivity

95 Active Bystander

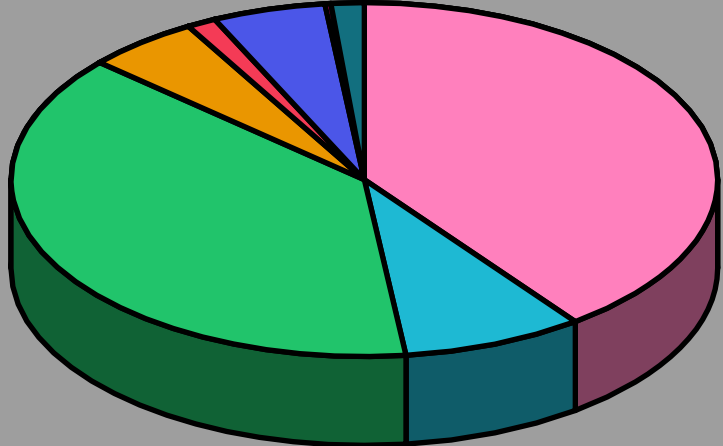
28 Ethical Dilemmas

25 Narrative Alchemy

6 Community Initiative

Number of attendees
per module

Percentage of workforce undertaking each module



Focus On Sessions	44.60%
PRAP Launch	9.30%
Inclusivity Launch	43.00%
Mentivity	5.80%
Narrative Alchemy	1.50%
Active Bystander	5.80%
Community Initiative	0.30%
Ethical Dilemmas	1.70%

1622 employees are eligible to undertake a module, with the mandatory requirement of 2 modules per PDR year.

Compliance at this stage will be monitored and recorded on PDRs via individual line managers as well as through registration processes and attendance sheets.

Page 31

- Focus On Sessions
- PRAP Launch
- Inclusivity Launch
- Mentivity
- Narrative Alchemy
- Active Bystander
- Community Initiative
- Ethical Dilemmas

Considerations

This data does not account for those employees taking part in multiple modules.

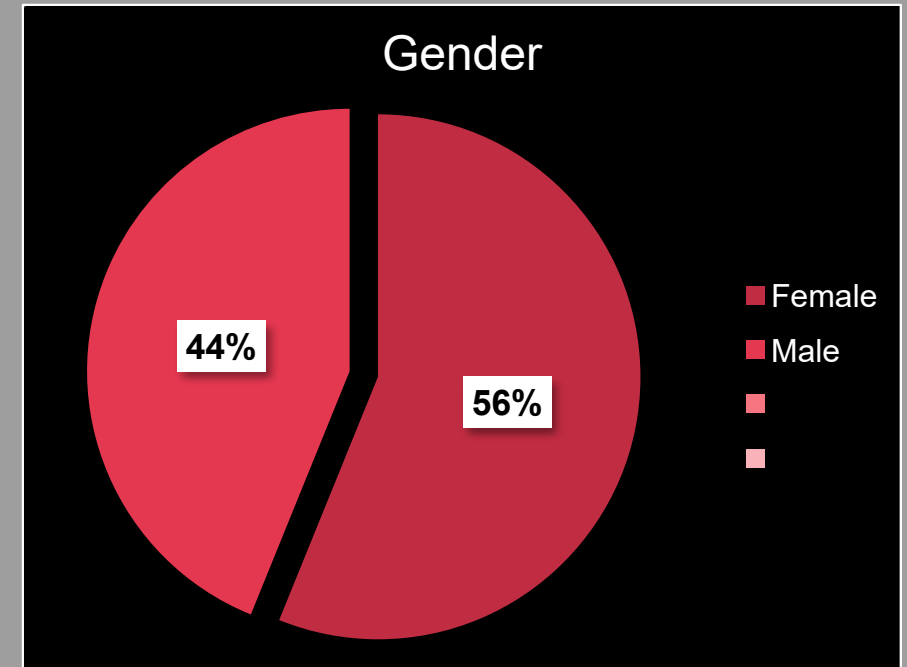
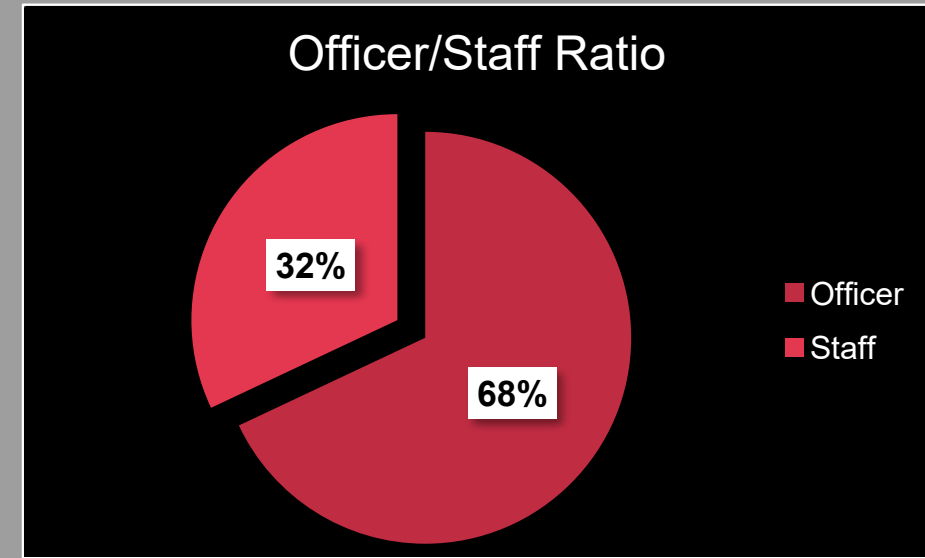
Number of sessions per module vary as to restrictions of attendee numbers.

Focus on sessions, PRAP Launch and Inclusivity Launch are available to view online, however viewer details cannot be recorded hence affecting the uptake data available.

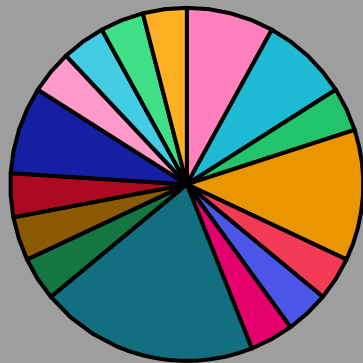
Focus on sessions have the most uptake, and understanding why should consider accessibility, length, number of sessions. Focus on sessions were online, 1 hr long, and have no registration process, hence increasing accessibility. This module also has the greatest number of sessions with no restriction on number of attendees.

Below is a breakdown of data for the Narrative Alchemy Module. This shows a varying aspects of attendee uptake data including departmental uptake, gender ratio and officer/staff ratio.

Limitations on gathering data to produce this for all modules, include resource, registration process, IT systems and attendee numbers.



Departmental Uptake Breakdown of 25 attendees



NFIB	8.00%
ECD	8.00%
HTCU	4.00%
PSD	12%
ART	4%
Major Crime	4%
FCCRAS	4%
NECVCU	20%
LOM	4%
Servator	4%
Local Policing	4%
ICOD	8%
L&D	4%
Support Group	4%
Cyber Griffin	4%
Fraud Ops	4%

- NFIB
- ECD
- HTCU
- PSD
- ART
- Major Crime
- FCCRAS
- NECVCU
- LOM
- Servator
- Local Policing
- ICOD
- L&D
- Support Group
- Cyber Griffin
- Fraud Ops

Committee(s): Professional Standards Integrity Committee	Dated: 27 February 2024
Subject: Draft 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 31-24	For information
Report author: Det Supt Carly Humphreys, Head of Professional Standards	

Summary

This report presents an updated draft of our new internal Equity, Diversity & Inclusion (EDI) Strategy (2024-2027). A first draft was presented to November 2023 Professional Standards and Integrity Committee (PSIC) for comment which has helped shape the current draft which is presented now for information.

This draft EDI Strategy has been written in consultation with the Corporation of London and also key stakeholders. 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 Strategy also reflects the changing policing landscape over the past few years and in particular reflects the work we are doing to restore trust and confidence, both internally and externally.

The updated version presented has incorporated a ‘Problem Statement’ following consultation with the Chair of PSIC. It also includes an updated set of ‘objectives, actions and measures’ to focus our EDI activity and track how well we are performing against these commitments. Internal consultation with our Networks and Associations has assisted in shaping our priorities in this Strategy and we are currently engaged with external independent consultation through EDI specialists.

Following completion of this consultation, the Strategy will be presented to the Chief Officer Team for final sign-off and publication in April 2024.

Please note that photographs are still being commissioned and will be added prior to publication.

Recommendation(s):

Members note the content of this report for information.

Appendices:

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

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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"

Chapters:

Commissioner Foreword_____

Section 01: Our EDI Problem Statement_____

Section 02: Consultation with Our People_____

Section 03: How Our Priorities will move the dial on EDI_____

Section 04: What does Equity, Diversity and Inclusion mean to us?_____

Section 05: Where are we now? Our Equity, Diversity and Inclusion journey?_____

Section 06: Key Achievements since our last Strategy_____

Section 07: Our People_____

Section 08: Our Public_____

Section 09: Our Processes & Policies_____

Section 10: Our Partners_____

Section 11: Governance and Organisational Performance Against Our Strategy_____

DRAFT FEB 2024

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.

DRAFT FEB 2024

SECTION 01: OUR EDI PROBLEM STATEMENT

The City of London Police recognises the critical need for fostering an inclusive and diverse environment with a strong sense of belonging in order to better serve and protect the communities it represents. In alignment with our principles of Equity, Diversity, and Inclusion (EDI), we aim to address existing and future challenges by implementing a comprehensive and ambitious EDI strategy. However, we also acknowledge that we face obstacles in achieving these goals, some of which are addressed below.

In designing our Strategy, we have sought to address the following Problem Statement so we can be clear on what our overall mission is:

How does the City of London Police become the most inclusive and community orientated police service in the country?

To answer this question, it was important for us to not only understand the importance of promoting Equity, Diversity, and Inclusion (EDI) in all that we do but also how we will continue to proactively invest in its importance. Not just across the organisation in enhancing our internal and external trust and confidence levels and sense of inclusivity and belonging, but also how we develop our community and partnership relationships, and overall operational effectiveness to provide the very best policing service to the public.

It is important to acknowledge that policing nationally has seen a fundamental redesign of policies and practices to eliminate all forms of discrimination. Indeed, alongside most other police services, we have heavily invested in improving our commitment to EDI priorities and developing innovative ways to improve community engagement and trusted relationships.

Despite this progress, we must acknowledge that there exists notable policing challenges hindering the successful implementation of a robust EDI Strategy. Many of these challenges are reflected in the lack of progress which policing has made to improve how it interacts with under-represented groups, and more locally, how we can improve our internal culture and processes to ensure that behaviours of employees who do not align to our values are dealt with robustly. Some of these broader acknowledgements have led to interventions by the Home Office, National Police Chief's Council (NPCC) and College of Policing (CoP) to bring about collaborative action through a number of plans and policing requirements.

In response, we have taken a candid review of how well we are delivering tangible progress for our people and our communities across EDI measures. It is clear that in previous years we have made insufficient progress and reform to meet the size of this challenge. This was observed in our 2020 rating of "Compliant" by Inclusive Employers, an extremely disappointing result which required focused attention for EDI to become front and centre in all that we do.

All police services have a collective responsibility to improve the policing profession nationally. Public trust, confidence and legitimacy do not re-set across force boundaries and systemic failures in one police service, tend to leave a footprint across all areas, particularly, where national policies and standards are set. So, it would be remiss not to consider the national policing EDI landscape when outlining what our City of London Police EDI priority objectives should be.

National Policing perspective:

Since the publication of our last EDI Strategy in 2020, there has been a cataclysmic shift in our national policing efforts to improve Equality, Diversity and Inclusion. Much of this work has been driven under the banner of 'improving trust and confidence', as we try to restore the significant harm caused by the lack of trust and confidence in policing, largely from under-represented groups who have traditionally had greater adverse experiences with police. Inquiries such as the Baroness Casey Review and Op Hotton, have also highlighted the need for all forces to improve upon their internal culture, professionalism, handling of complaints and misconduct cases, vetting procedures and community relationships.

At this time, both the National Police Chief's Council (NPCC) and the College of Policing (CoP) are re-writing their EDI Strategies to ensure that they reflect the current 'state of policing'. In absence of a current and relevant national strategy to inform our local perspective, we can place some reliance upon the national priorities set by both the NPCC and CoP to deliver on key areas, such as: National Police Race Action Plan, Violence Against Women and Girls, and National Hate Crime Performance, to inform the direction of our EDI Strategy. Additionally, in 2023 the Home Secretary added Violence Against Women and Girls to the Strategic Policing Requirement, which extended the importance for all forces to assess their capability and capacity to deal with this issue as a national threat.

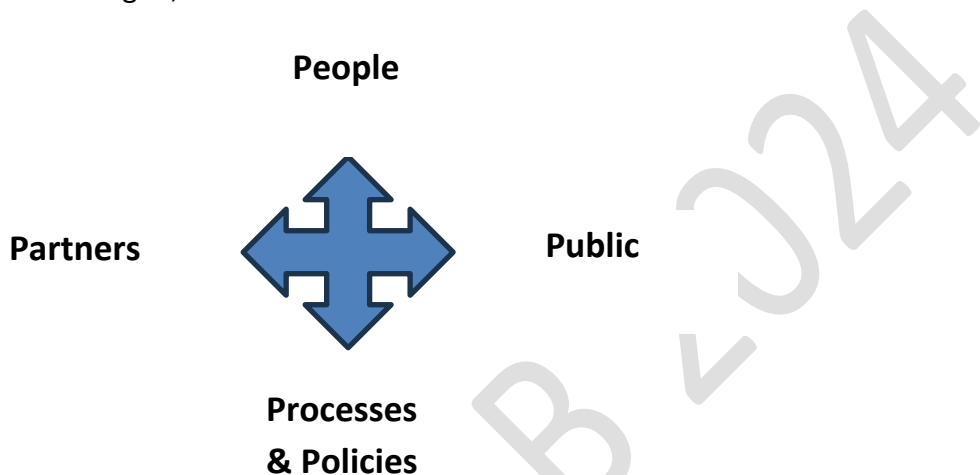
Policing has also learned that trust and confidence is a much broader issue in how we serve our communities, beyond protected characteristics. This has been particularly true in the Duty of Candour which has now been introduced by the College of Policing within our upcoming Code of Practice for Ethical Policing. This requires policing to openly acknowledge when mistakes have been made and to act in the interests of the public. In January 2024, the College of Policing also launched the new Code of Ethics which is supported by the Code of Practice for Ethical Policing, including actions that Chief Officers should take to support people in their force to use the ethical policing principles. To uphold these responsibilities, a priority for our Strategy will be to provide a supportive environment where everyone is encouraged to be open, candid and raise any concerns without fear of repercussions.

City of London Police perspective:

One of the most helpful discussions for us to have had in improving EDI outcomes, has been involving our people and communities in how we redesign our policies, practices and implementation of our activities in order to eliminate discrimination and become truly inclusive in all that we do. Analysis of our own internal Violence Against Women and Girls Action Plan and our Race Action Plan have equally shown that we do not yet fully understand these communities and how to improve the effectiveness and impact of how we can include these communities in how

we operate. This is part of our ongoing project in improving our approaches to community engagement so that they are innovative, relevant and agile to the needs of our communities.

Therefore, it clearly made sense that in determining what our Strategy should prioritise and why, community engagement featured heavily alongside existing data such as HR modelling, community demographics and surveys. We have also reflected upon the existing consultation carried out with key stakeholders through workshops and listening circles pertaining to existing priority areas, such as our Neighbourhood Policing Strategy, Police Race Action Plan and Violence Against Women and Girls Action Plan. Combined, this helped shape our priorities for this Strategy across four areas, consisting of, Our:



Across these priorities, our engagement and existing national and local evidence revealed that the biggest problem areas preventing our organisation from moving the dial on EDI are:

1) Underrepresentation:

Data shows that our representation across ethnic groups for Police Officers is lower than the percentage from City residential communities, and much lower than the Greater London percentage. For Police Staff, the representation levels across ethnic groups more closely resemble a Greater London percentage. Greater representation across ethnicity, gender and sexual orientation is required for us to be truly representative.

In comparison across the National Police Workforce Census (March 2023), the City of London Police has the fifth highest percentage of ethnic minority Police Officers across all forces. For Police Staff, City of London Police has the third highest percentage of ethnic minority staff across all forces. However, we understand through consultation that comparators across policing are not always an ambitious benchmark. In recognition of this, our Strategy will seek to make year-on-year improvements through dedicated recruitment and retention schemes to improve how we reflect the communities we serve.

Across our specialist and leadership teams, there is a noticeable underrepresentation of diverse communities, both in terms of ethnicity, sexual orientation and gender. Unless addressed, this underrepresentation will inhibit our ability to understand and respond effectively to the diverse needs of the communities we serve and may result in a narrower perspectives within decision

making. It may also hinder people within the organisation from seeing 'someone like them' in more senior or specialist roles to represent back as a mirror.

Having role models from underrepresented groups is important, however we recognise the need for a critical mass to create change. So we must remain steadfast in our commitment to improved representation levels across all roles, ranks and grades.

2) Cultural Sensitivity and Competence:

There is a pressing need to enhance cultural sensitivity and competence among police officers to bridge the gap between the police and diverse communities we serve. Our Police Race Action Plan and survey data demonstrates a need to improve in this area. Although we have made progress over the past few years, in particular with training and how we embed understanding of lived experiences, some training programmes nationally and within our organisation still lack the depth required to instil the necessary understanding and respect for diverse cultural backgrounds and protected characteristics.

3) Perceived Bias and Trust Deficit:

Some of our communities, particularly those from underrepresented groups, express concerns about perceived bias in police interactions. This is also evidenced through national reviews into our policing response for Violence Against Women and Girls and the Police Race Action Plan. This trust and confidence deficit, has hindered our ability to effectively collaborate with all of our communities and some areas of our workforce.

4) Inclusivity and Belonging Deficit in Organisational Culture:

Our existing organisational culture does not yet fully embrace inclusivity and belonging, making it challenging for individuals from diverse backgrounds to feel valued and contribute optimally. Addressing biases, both explicit and implicit, within our organisational structure is crucial for fostering an environment where everyone feels included, has a sense of belonging and can thrive. Promisingly, a recent survey from our Race Action Plan showed that 88% of respondents believed that the organisation was either 'Totally Inclusive' or 'Mostly Inclusive'. However, our consultation with our Networks and Associations in designing this Strategy, also revealed that not all groups have similar feelings of equity and belonging in the organisation.

6) Embracing difference:

Our organisation needs to improve its understanding of the social model of disability and take action to improve environmental barriers. Within our workshops and across a number of surveys, our employees have asked for more to be done in ensuring that we embrace difference and understand both our workforce and all of the communities we police, whether through reasonable adjustments to support those with disabilities, ensuring our estates and processes are truly accessible, and making the most of our neurodivergent talent.

7) Community Engagement:

Our organisation has unique responsibilities which reflect our local role, where we are responsible for keeping the iconic City of London safe, alongside our national roles in relation to economic crime, cybercrime and protective security. Engagement needs to be considered as a core element of our policing activity and our consultation supports our recognition that we need to continue to truly understand the needs of our external communities. We have a genuine commitment to this and have already begun in our investment to improve this area, particularly around digital engagement and feedback platforms. However, more growth is needed to ensure that our engagement approaches meets the needs of our evolving and expanding communities.

8) Hate Crime:

The College of Policing have developed new Authorised Professional Practice guidance on Hate Crime. Nationally, communities have raised this as a consistent policing issue and we share this concern, it also compliments the work we are doing through our Police Race Action Plan and Violence Against Women and Girls Action Plan. As part of our Strategy, we will ensure that we prioritise our response to Hate Crime and ensure that steps are taken to manage risks to vulnerable people and communities. Part of this work is intrinsically linked to improving public trust and confidence in our police service, to ensure that all incidents of hate crime are being reported, providing us with confidence in the issues we face and also how we can prevent incidents and support communities adversely affected.

Objective:

Our aim is to develop and implement an EDI strategy that addresses these challenges comprehensively, leading us to *become the most inclusive and community-orientated police service in the country*. This strategy will focus on increasing representation, enhancing cultural competence, rebuilding trust, fostering an inclusive organisational culture, embracing our differences and improving how we engage with our communities. Through this, we will seek to become a policing role-model for inclusivity and belonging, reflecting the diversity of the communities we serve and promoting effective, equitable, and community-oriented policing.

We acknowledge that the challenges to improve EDI go much beyond this, however the purposes of this Strategy are to focus our efforts on what will move the dial on EDI to make significant improvements for our employees and communities. Working with finite resources will always mean that despite the collaborative arrangements we have, we won't be able to tackle all of the issues which pertain to EDI. However, we will ensure that this Strategy is refreshed annually to ensure that we are dealing with the contemporary issues that matter most to enable us to deliver our Policing Plan objective in delivering a **local service with a national role, trusted by our communities to deliver policing with professionalism, integrity and compassion.**

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SECTION 02: CONSULTATION WITH OUR PEOPLE

“What does the most inclusive and community orientated police service look like to you?”

Our people said:

- Understanding the views and needs of all our communities.
- A force that polices all people fairly.
- Policing to needs of individuals and community.
- Reach includes online and in person.
- Treat all communities the same, this also means not giving priority to certain minority groups over others.
- Police staff regarded equal to officers.
- Diverse staff progressing and developing within the force.
- Diversity of staff reflects the demographics of the people we serve.
- Elimination of existing nepotism and misogyny.
- Proper processes, support mechanisms and structures in place to fully support the ambition. Just saying it and committing to the ambition verbally doesn't make this happen.
- Implementation and sticking to what policies we have in place already including acting on grievances.
- Celebrating good work, not just highlighting issues.

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SECTION 03: HOW OUR PRIORITIES WILL WE MOVE THE DIAL ON EDI

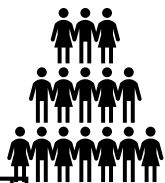
In order to make effective change, we must prioritise our efforts on the areas of EDI that most acutely affect our people, our communities and our collective ability to be an efficient and effective police service.



Our

Objective:

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

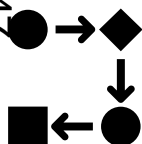


Our

Objective:

Equity, Inclusion and Belonging is central to how we deliver our service (local and national communities) and the public trust us to act fairly and with integrity.

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Our

Processes

Objective:

Our Policies, Processes and Procedures are fully inclusive and informed by diverse representation on our scrutiny and key decision-making bodies.



Our

Partners

Objective:

We influence Equity and Inclusion through our network and supply chain.

SECTION 04:

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 for all 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 and Diversity' 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 into 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 focused to create an environment where all our employees feel valued, respected, and empowered to participate fully and contribute to their maximum potential. These are collectively what creates a sense of Belonging, put simply, the degree to which our employees feel able to be their authentic selves in our organisation.

This extends to ensuring that diverse perspectives, backgrounds and experiences are taken into account and represented in decision-making processes, policies and practices. This commitment is for 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.

DRAFT FEB 2024

SECTION 05:

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 in particular. To address this, improving our representation and the experience of policing by our diverse communities must 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 workforce equipped to deliver an excellent policing service.

2020

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.

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.

SECTION 06: 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 07:

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

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

In implementing an EDI Strategy which will provide tangible progress for our people and the communities we serve, it is paramount that we have an in-depth understanding of how we represent those communities.

Our current workforce profile based against the City of London and Greater London populations, largely show that disappointingly, we still have much more work to do to become fully representative of our communities.

Population

8,600

people

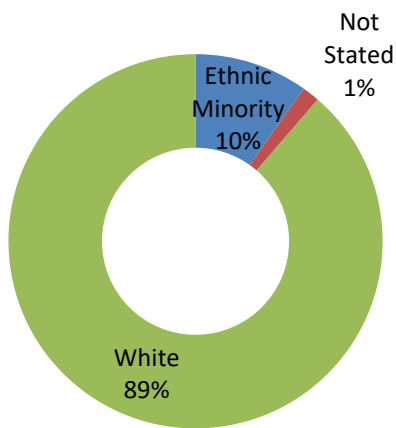
56,490,000 people in England

Rounded to the nearest 100 people

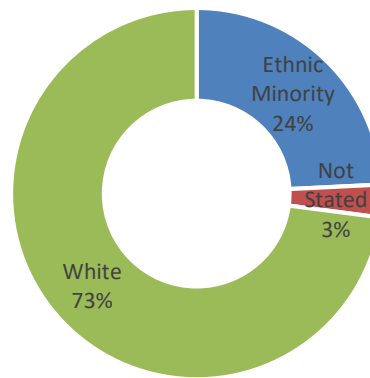
Data based on the 2021 Census shows that the City has a residential population of 8,600. However, the public we serve are beyond the square mile and span nationally and internationally through our National Lead Force areas for Cyber and Fraud. Indeed it is estimated that in 2021 there were 587,000 workers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

Officer Ethnicity Profile (%)



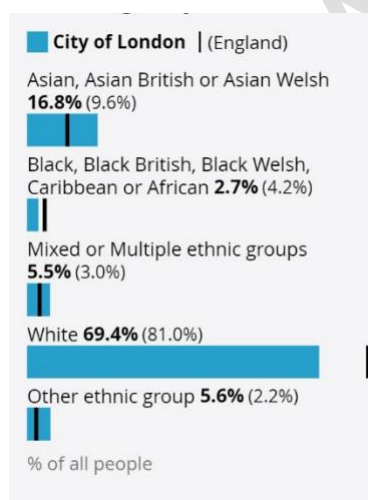
Staff Ethnicity Profile (%)



The National Police Workforce Census for March 2023 shows City of London Police has the fifth highest percentage of ethnic minority Police Officers across all forces, the average across 44 forces was 4.9%. For Police Staff, the City of London Police has the third highest percentage of ethnic minority staff across all forces, the average across the 44 forces was 5.5%.

Comparing our ethnicity profile against the Greater London area is also an important gauge for how well we are representing the communities we serve. Particularly as the Greater London population is a part of our commuter and leisure communities, and our own workforce. Comparatively, to more closely reflect the Greater London population, we will continue to improve these representation levels year on year and be bold in our efforts to attract and retain diverse talent.

Ethnicity (residential):



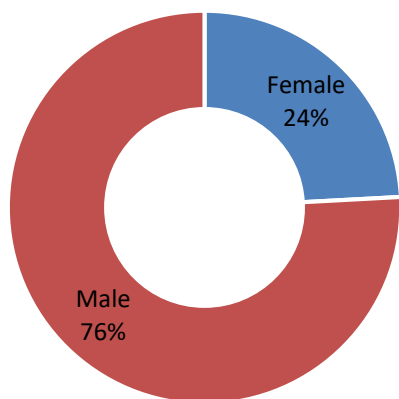
As of 2022, 37% of the **commuter workforce** was black, Asian or identified from another minority ethnic group, with the remainder identifying from a white ethnic background.

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.

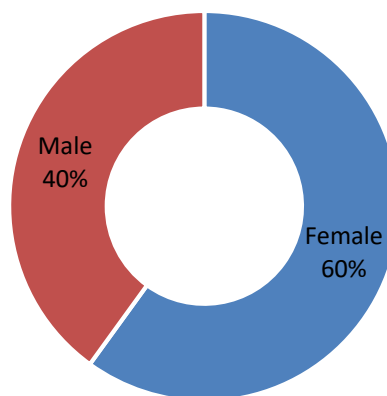
Ethnicity across Greater London:

- Asian (7%)
- Black (7.9%)
- Mixed (27.1%)
- White (43.4%)
- Other (14.6%)

Officer Gender Profile (%)



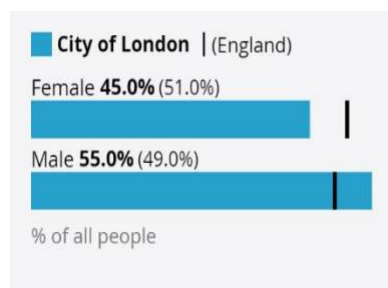
Staff Gender Profile (%)



The National Police Workforce Census for March 2023 shows City of London Police has one of the lowest female representations amongst Police Officers across all forces. The average female representation across all 44 forces was 36.1%.

For Police Staff, City of London Police has a lower female representation compared to other forces, the average female representation across all forces was 63.2%. However, our profile shows that the City of London Police does have a positive gender split across Police Staff.

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.

Gender across Greater London:

- Female (51.4%)
- Male (48.5%)
- Other (0.1%)

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.

Our internal gender data collection requires improvements as the binary interpretation of 'male' or 'female' excludes transgender and gender-nonconforming people. To overcome this, we need to collect gender data in a way which is more inclusive and equitable.

One area of work will be to continue to provide targeted support to people from under-represented groups, including those from the LGBTQ+ community, disability community and neurodiverse community, 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 everyone.

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 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 recommend 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 reinforced our commitment to a more diverse and inclusive future leadership team. Development in this scheme will see these initiatives offered to other under-represented groups. This 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 in recognising 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 those in senior positions of responsibility 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. Population data estimates that approximately 15% of people are neurodivergent, so we must be 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, 2024 will see the introduction of pro-active team cultural audits which looks at the internal conduct and culture of teams. The cultural audits 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. It will also provide the support and tools to address these, giving confidence to employees that issues are being addressed. The cultural reviews will also allow the force to have an understanding of risk areas or emerging themes which require positive intervention.

Dealing swiftly with discrimination, micro-aggressions and 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, and information to bring to life 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, inclusivity and a firm sense of belonging.

And whilst we recognise the progress we have 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. This 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 future leaders.
- 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. 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.

As we launch this EDI Strategy, we also welcome the launch of the new Codes of Ethics and the Duty of Candour contained within this. These requirements place responsibility on our Chief Officer team to ensure openness and candour within the organisation. Policing must never seek to defend the indefensible and we must openly acknowledge when mistakes have been made. This Strategy is part of how we will honour this commitment by providing a supportive environment where everyone is encouraged to be open, candid and raise any concerns.

OUR PEOPLE



OBJECTIVE

“We have a workforce that reflects the communities we police and an environment which creates a sense of belonging”.

ACTIONS

- Implementing a recruitment programme of activity which improves how well our workforce reflects the communities we serve at all levels.
 - Delivering a viable positive action scheme which supports officers and staff from under-represented groups to develop laterally and through promotion.
 - Fostering an inclusive culture where our people feel a sense of belonging.
 - Ensuring that our leaders are championing and being held accountable for equity, diversion and inclusion
 - Promoting behaviours and conduct in line with the Policing Code of Ethics, dealing swiftly with discrimination, micro-aggressions and behaviour falling below this standard.
-

MEASURES

- Selection, Recruitment and Retention Figures (Number of employees applying, joining, leaving our force with protected characteristics)
- Number of officers and staff from protected backgrounds being promoted, including figures for those engaging in support programmes.
- Year-on-Year increases in the proportion of employees who self-declare their protected characteristics
- Improved assessments of our internal culture through the lens of our people (survey responses and evaluation of our Inclusivity Programme) and externally from our Inclusive Employers Standard (IES) rating and feedback.

SECTION 08:

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.*

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:

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 as it will also feature how we support communities in our national lead force responsibilities. As part of this commitment, we will remain forward-thinking in how 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' project.

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.

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 Police Race Action Plan and Violence Against Women and Girls Action Plan. Our broader Policing Plan links into these strategies ensuring that we are working collectively to improve trust and confidence across our national and 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 Independent Advisory and Scrutiny Group (IASG) and workforce to provide oversight on activity, as well as input to inform our strategic decision-making at key governance boards.

It is worthy to note that 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 for women and girls within the City.

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.

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, there is a coordinated approach to 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. This has already been seen through our work 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.

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

Hate Crime can take many forms and sadly has a devastating impact on the lives of people across all communities, often it acutely affects those who already have a sense of vulnerability. We will continue to robustly deal with anyone who victimises another through threats, abuse, and in some cases physical violence, because of their gender identity, sexual orientation, race, religion or other perceived difference.

Our approach to tackling hate crime will be informed by national best practice, utilising the College of Policing's new Authorised Professional Practice guidance. 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, taking a proportionate, sensitive and thorough investigation, taking into account the rights and freedoms of all parties, without unnecessarily restricting any individual's right to free speech.

OUR PUBLIC



OBJECTIVE

“Equity, Inclusion and Belonging are central to how we deliver all of our services and the public trust us to act fairly and with integrity”.

ACTIONS

- Implementing a Community Engagement Strategy to effectively understand concerns and measure the impact of our services, implementing any improvements required.
 - Improving our cultural awareness and putting our learning into practice to ensure that all of our communities are treated with fairness, dignity and respect.
 - Developing innovative mechanisms whereby we can maximise visibility and reach within our communities, seeking timely feedback which is acted upon.
 - Maintaining the highest standards of response to hate crime, ensuring we take action to provide appropriate and sensitive community reassurance.
-

MEASURES

- Publishing and monitoring data on disproportionality and use of police powers, especially stop / search and use of force
- Number of consultations taken place with our communities- ‘visibility and reach’ metrics
- Satisfaction levels of our communities and customers, including ability to provide feedback and whether this is acted upon.
- Narrative reporting from our own officers and staff on how their improved awareness / training has impacted on attitude and behaviour change.
- Monitoring the levels of reporting of hate crime and demonstrating how we have responded

SECTION 09:

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.*

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 scrutinising the use of these powers. These processes enable us to examine and develop our understanding where disproportionality in our actions exist, 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 Police 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 \(parliament.uk\)](https://www.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 have launched 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 on 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 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. The Covid-19 pandemic also quickened our move to a more hybrid way of working. Research has shown that this increased flexibility in being able to work remotely,

has particularly benefited women as primary care-givers as will contribute to closing the gender-pay gap as women are more able to balance full-time working hours.

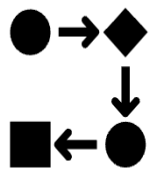
We appreciate that achieving true equality involves ongoing efforts to address and minimize disadvantages faced by individuals due to their protected characteristics. The Equality Act 2010 forms the backbone of our commitment, providing a comprehensive legal framework for protecting individuals from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

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.

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.

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 communities we serve.

OUR PROCESSES AND POLICIES



OBJECTIVE

“Our Policies, Processes and Procedures are fully inclusive and informed by diverse representation on our scrutiny and key decision-making bodies”

ACTIONS

- Implementing a Community Engagement Strategy to effectively understand concerns and measure the impact of our services, implementing any improvements required.
 - Improving our cultural awareness and putting our learning into practice to ensure that all of our communities are treated with fairness, dignity and respect.
 - Ensuring internal and external scrutiny and decision-making include a range of perspectives that are representative of our workforce and communities
 - Developing innovative mechanisms whereby we can maximise visibility and reach within our communities, seeking timely feedback which is acted upon.
 - Ensuring policies and practices enhance workforce equity and inclusion, including workplace adjustments, equal pay and flexible working. To include a clear and transparent process around promotion opportunities.
-

MEASURES

- Publishing and monitoring data on disproportionality and use of police powers, especially stop / search and use of force
- Number of active Staff Networks and Associations, including membership numbers, and levels of satisfaction in respect of engagement on our policies and procedures.
- Membership numbers of external scrutiny groups and assessment of representation across protected characteristics.
- Monitoring of numbers of policies reviewed and accompanying ‘consultation’ rates (number of requests for review of policies / process). Both internal (networks) and external (scrutiny groups).
- Feedback EDI members on governance and coherent approach
- Data on salary scales / pay gap, implementation of reasonable adjustments and flexible working application approvals

SECTION 10:

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

Contribute to development and delivery of the wider City of London Corporation equity, diversity 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.

The City of London is an extraordinary unique network of networks which encompasses many different communities, one of which we are part of. The new City Belonging Project initiated by the City of London Corporation, will bring about further opportunities for us to work collaboratively in inclusive spaces to improve links amongst diverse networks.

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 and City Belonging Project, 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.

OUR PARTNERS



OBJECTIVE

“We influence Equity and Belonging through our networking channels and our supply chain”.

ACTIONS

- Contributing to the development and delivery of the wider City of London Corporation Equity and Inclusion Strategy.
 - Embedding equity, diversity and inclusion throughout the contract process, working with suppliers who operate with EDI values which are aligned to our own.
 - Use our understanding of local communities and protected characteristics to inform partnership activities to help keep communities safe.
 - Actively seeking out best practice from other organisations and initiatives who ensure that EDI considerations form part of their approach to partnerships, replicating this where appropriate.
-

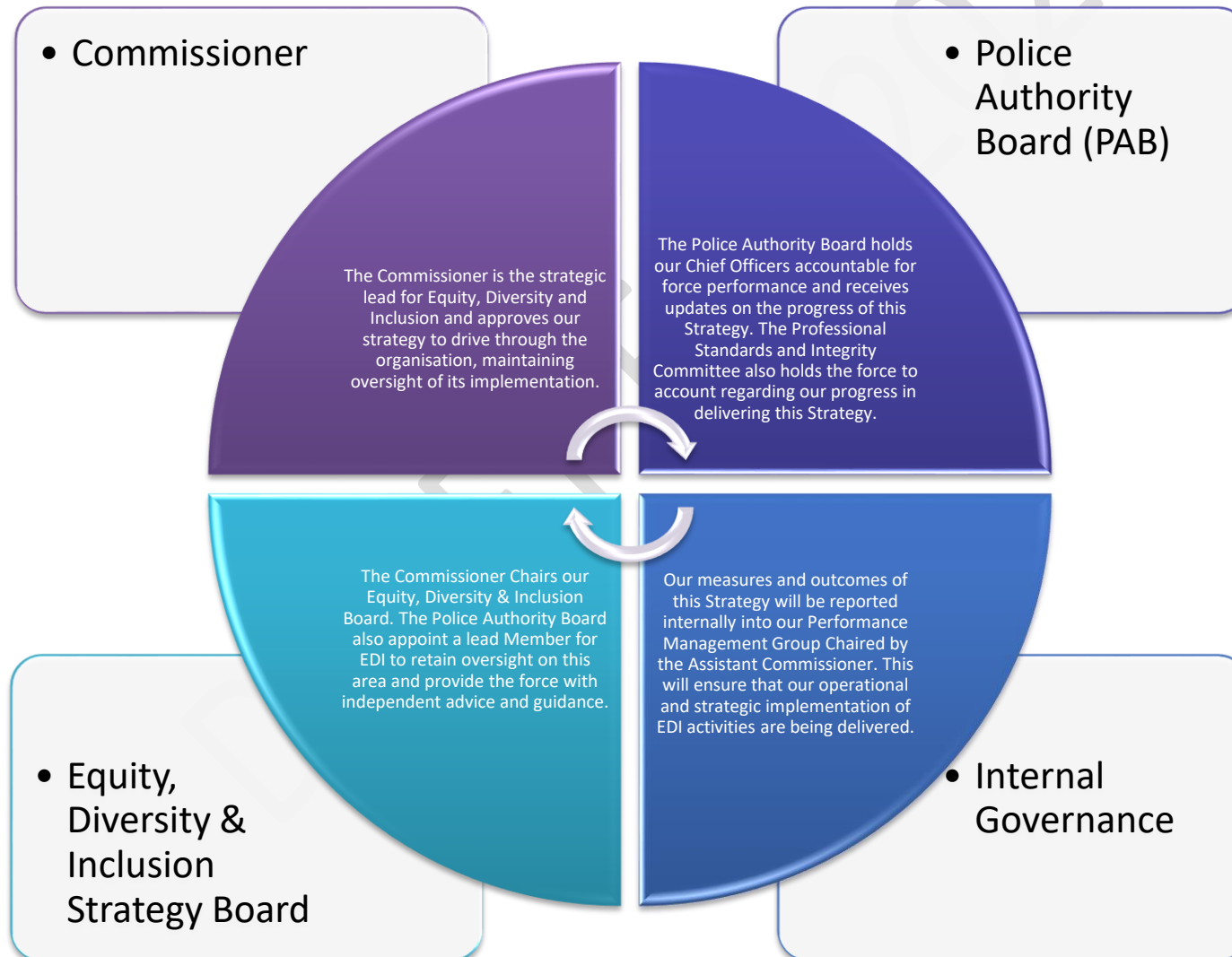
MEASURES

- Number of Procurement bids which properly incorporate an EDI assessment (as per City of London Corporation Commitments)
- Number and ‘Quality’ of new ethical partnerships formed across all areas of our service delivery.
- Demonstrating (via narrative) how we have informed partnership activities using EDI mechanisms.

SECTION 11:

GOVERNANCE AND ORGANISATIONAL PERFORMANCE AGAINST OUR STRATEGY

Page 73



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.

DRAFT FEB 2024

Agenda Item 7

Committee(s): Professional Standards and Integrity Committee (PSIC)	Dated: 27 February 2024
Subject: Quarterly Stop and Search and Use of Force update (Q3)	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 34-24	For Information
Report author: T/Chief Supt Bill Duffy, Head of Local Policing	

Summary

City of London Police (CoLP) continue to support Op Benbow¹ and deploy to Palestine Solidarity Campaign / Pro Israel protests within the City and across London. These protests have been incredibly sensitive in their nature and a measured intelligence-based approach has been used. As both the nature of the protests and signage and potential crimes have evolved, so has the need to adjust the approach to policing – these protests are less likely to result in stop search than other large-scale events as most items are already on show and not as likely to be concealed.

Stop/searches are far more prevalent at major events such as Notting Hill Carnival from Q2 when trying to protect and reassure the public in attendance where credible evidence of violence and weaponry may be more likely. This likely accounts for decreases in the overall stop search numbers (including juveniles) due to the lesser use of Section 60 from Q2 to Q3.

Of the 613 stop/searches in the Q3 period, 88 were dip sampled at a rate of 14.4%, experiential learning and feedback is given to officers where appropriate. There are 5 live ongoing formal complaints under investigation and any learning from these will be shared as necessary.

The drop in overall stop/search coupled with the discovery of the same number of items from Q2 to Q3 has increased the success of positive outcomes from 34% to 43%. This also accounted for a period that saw disproportionality decrease in both Black and Asian categories from 2.5 to 2 and 0.9 to 0.7 respectively. (National rates 2023 - Black ethnicity – 4.85, meaning a person of Black ethnicity is nearly five times more likely to be stopped and searched than a white person, Asian ethnicity – 1.58 times more likely to stop searched).

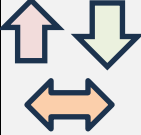





¹ Op Benbow- Cross Border mutual aid Operations with MPS

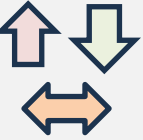







The University of East London bid continues to be developed and will provide academic and meaningful analysis of CoLP actions, once vetting and logistical issues have been overcome the project can begin formally. It is hoped this will begin in Q1 of 24/25.

Amazon Web Services (AWS) hosted an event on Friday 2nd February that saw CoLP and the MPS work with youth groups from across London. Aim of the session is to build trust and confidence in policing. Youth groups reviewed Stop Search and highlighted ways the interaction between police and youth groups could be improved. Learning and input from these sessions will be utilised when relaunching internal scrutiny groups within CoLP to maximise learning and increase confidence within these key groups. This will be expanded to include all those groups that may be deemed vulnerable.

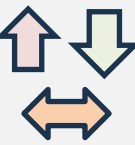



Stop and Search and Use of Force Data

- **Key changes** – see comments below
- **Disproportionality** – see comments below
- **Outcomes** – See below

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend	Comment (if appropriate)
Stop search	613	-111 15.3%		
Arrest from stop search	176	3 1.73%		Significant reduction in total stop/search but policing was centred around public order as well as acquisitive crime during the Christmas Operations
Searches under s.60	2	-42 95.5%		Minor increase, not a significant effect on this data set
Juveniles searched	60	-7 10.4%		Significant reduction as many Section 60 searches cover events such as a large CoLP contingent at Notting Hill Carnival, this has knock on effects on juvenile stop/search figures
Black disproportionality	2	-0.5 20%		
Asian disproportionality	0.7	-0.2 22.2%		

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend 	Comment (if appropriate)
Total items found	244	0		No change in the items found in this quarter but overall stops are down thus increasing the apparent efficiency of stop search
Strip searches ² total	2	1 50%		No significant change in this data
Strip search-More thorough	8	-8 50%		Although this shows a 50% reduction, these are relatively small numbers. No clear reason for this reduction.
Juvenile strip searches total	0	0		N/A
Juvenile Strip search-More thorough	0	0		None – see above
Juvenile Strip Search -Intimate parts exposed	0	0		None – See above
Use of force	668	-56 8%		Small decrease in the Use of force in this period. No single determining factor
Juvenile use of force	16	-14 47%		Again, although a significant percentage change, these are relatively low numbers and the summer holidays may impact on stopping of juveniles

² See Appendix A for description of types of strip search

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend 	Comment (if appropriate)
Uses of force arrests	230	-386 40%		Due to a technical Power BI issue, there are 58 awaiting supervisors assessment from December 2023 which may also contain arrest detail. This is being rectified and will be looked at in the next update if appropriate.
Uses of taser	5	-34		There is currently no clear reason for this reduction in Q3. Anecdotally, it may be owing to CoLP currently having less Firearms officers which has led to this reduction.
Taser discharges	0	0		
Live complaints relating to stop/search	0	5		These are complaints that arise from stops and stop/search. Again, no gravity measure to each complaint but immediate trends or issues would be addressed if appropriate
Live complaints relating to use of force	3	5		Minor rise in ongoing complaints – as with stops and stop/search, no significant issues noted or requiring immediate remedy

Key wider issues, risks, and mitigations

- The MPS Stop/Search Charter is being explored and may lead to a change in terminology and process with “strip” searches having a new process. The MPS call this a ‘more thorough search where intimate parts’ are exposed (MTIP) search, an extract from the guidance is: *This is where you take the person who you are stopping and searching to a private place, usually but not always a police station and remove their underwear because you suspect an illegal item is being hidden there. Do not confuse MTIP searches with ‘strip searches’ which are different and take place in the custody suite after arrest and in custody. The ‘intimate parts’ are genitals, buttocks & female breasts.*
- This comes with guidance and checklists to ensure all officers know their responsibilities and CoLP will look to integrate with our systems and to ensure we have scrutiny and correct governance.

Forward look

- Upcoming weeks of action by climate groups may impact on Stop/Search figures for Q4 reporting, intelligence is still being gathered and this will develop in due course.
- Op Reframe and Taskforce calendar might impact Stop and Search/Use of Force as specialist units have weeks of action to coincide with the NPCC “drug” week W/C 4th March 2024.

Contact:

Bill Duffy

Chief Supt Local Policing and Taskforce
City of London Police

Appendix A

Information on Strip Search policy and SOP

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

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

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Agenda Item 8

Committee(s): Professional Standards and Integrity Committee	Dated: 27 th February 2024
Subject: Professional standards, conduct, and vetting Update Q3	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 32-24	For Information
Report author: D/Supt Humphreys/PC Ann Roberts Professional Standards Dept	

I. Summary

- Overall, the volume of Complaints remains fairly consistent in comparison to Quarter 2. Although there is a reduction in the overall number of Conduct cases, there has been a rise in the number of Conduct cases which have been assessed as Gross Misconduct. Some of this demand has been mitigated through the uplift in resourcing across the Complaints and Misconduct team.
- On 23rd January 2024, the National Historical Data Wash was released to the public. The National Police Chief's Council (NPCC)¹ led on directing compliance from forces, requiring that all police officers, staff, and volunteers in England and Wales were checked against the Police National Database (PND) to identify any intelligence or allegations that required further investigation. The checks on the PND records were not time-bound and explored all historical entries. For City of London Police (CoLP) of 1,535 employees, thirteen were identified as needing a vetting review, with further enquiries concluding seven of those did not need further action and the remaining six subject to appropriate actions, including re-vetting.
- Rising legal costs remain an issue, particularly due to the majority of conduct cases meeting the threshold of Gross Misconduct and a large proportion of them being referred to Gross Misconduct Hearings. There remains a delay in Hearings due to the lack of available Legally Qualified Chairs, resulting in officers remaining on suspension for extended periods. Where appropriate to do so, the Appropriate Authority will look to use Regulation 13² or

¹ [Results published in policing's largest integrity screening project \(npcc.police.uk\)](https://www.npcc.police.uk/news/2024/01/23-national-police-chief-council-releases-national-historical-data-wash)

² Regulation 13 of the Police Regulations 2003 is a rule that allows the Chief Officer to dispense with the services of a probationary constable or a direct entry or rejoiner member if they are not fit, efficient or well conducted.

Accelerated Misconduct Hearings, however this is not permissible in Regulations for the majority of current cases.

II. Key issues from complaints and conduct data and actions taken

• Complaint volumes, content, and performance –

This document contains the statistics prepared by the Professional Standards Directorate for the third quarter of 2023/24 (Oct to Dec).

This quarter the total number of CoLP complaint cases logged is 39.

This is separated into 9 dealt with under Schedule 3 of the Police Reform Act 2002 and 30 not within Schedule 3. This figure of 39 complaints is an increase compared against Q2 where a total of 32 complaints were logged; 14 under Schedule 3, and 18 not within Schedule 3.

Of the 68 allegations recorded during Q3 2023/24 the highest number were in the category of Police Action following contact (8) General level of Service (7) Power to arrest /detain (6) Handling or/or damage to Property/premises (6).

This is a decrease in allegations recorded against Q2 of 1 (1%).

Allegation types 'Power to arrest and detain', and 'Use of Force' have featured each quarter over the last yearly period, within the highest recorded types, and whilst Use of Force doesn't feature in the top 5 of Q3 - 5 allegations were recorded within this category. The allegation type General level of Service has also returned to the top five allegations, which featured in both the annual top 5 data 2022/23 and Q1.

Q3 has 3 out of 5 highest allegation type categories featured. The overall 'Top 5 allegation types' are: General level of service, Police Action following contact , Use of Force, Unprofessional Attitude and Disrespect and Power to arrest and detain. This quarter we had: Police action following contact (8) General level of service (7) Handling of or damage to property (6) Power to arrest and detain (6) as the highest allegation types. Use of Force and Information had (5) allegations each.

Q3 – Data examination: -

Analysis of the highest allegation categories (the latest Q3 is compared against both the previous quarter(s) and the total year (2022/23) where allegations concerning Organisational type allegations involving service delivery/expectations are recorded under (A), and procedural type allegations which incorporates Use of Force and Power to arrest and detain (B) remain the highest areas of complaint type. This is consistent with National data in the IOPC bulletins. Examination into the allegations of a non-organisational nature, power to arrest and detain, recorded during Q3 has identified 6 allegations within six cases. Of which, 4 are within schedule 3 and 2 non schedule 3 (one has been finalised – No further action, one is sub judice, four cases are still live and under investigation). It is noted that

these allegations are contained within cases that have multiple allegation types, some of which include Use of Force.

The total number of allegations finalised during Q3 is 51 compared to 55 in the previous quarter.

Of the 51 allegations finalised, 25 were Resolved, 5 Service provided was acceptable, 1 case to answer*, 7 No further action, 8 Not resolved/No further action, 5 no case to answer.

*The one case to answer (unprofessional attitude and disrespect) relates to the initial complaint involving an officer dismissed from the Force following a Misconduct Hearing during Q2.

Cases often contain more than one allegation; the number of cases finalised in Q3 is 33, compared to 20 finalised in Q2.

Of the cases finalised 9 were logged as Schedule 3, and 24 were not under Schedule 3. There were no cases finalised under the previous regulations.

- **Conduct volumes, content, and performance –**

During this quarter, 11 new conduct investigations were recorded, and 3 were finalised. There are currently 36 live conduct investigations. 16 of which have been assessed as Gross Misconduct. Of the matters assessed as Gross Misconduct – Discreditable conduct is the highest allegation type and relates to matters of a sexual nature. Most of these cases are complex and are into long investigation times. Newer conduct matters appear to be moving away from this allegation type and into Honesty and Integrity matters.

Four Conduct matters have been finalised. 2 cases contained reflective practise as an outcome and 2 cases No case to answer.

- **Key wider issues, risks, and mitigations**

An uplift in our PSD investigation team has aided an improvement on our finalisation rate for both Schedule 3 and non-Schedule 3. To note, the increasing number of Gross Misconduct investigations is somewhat compounded by an increase in complexity of the cases and also, where a criminal investigation is also required. This complexity is tending to increase the length of time which officers are under investigation, in addition to rising costs, such as requiring expert witnesses for use of force or legal reviews. As stated, some of this is mitigated by the uplift in our PSD investigation team and will also be aided by the College of Policing introduction a national qualification for PSD investigating officers which will assist to further professionalise the role. The lack of available Legally Qualified Chairs (LQCs) is also resulting in delayed Misconduct Hearings which has a financial cost to the organisation whilst officers remain under suspension.

- **Vetting** -Members are provided with separate reports on the agenda for the HMICFRS Inspections update into Counter Corruption and Vetting, and also the Historical Data Wash which is aligned to the work of both departments.

Vetting demand remains high, however this is largely due to some recruitment challenges during a period of national requirements, such as the impact of the Historical Data Wash and also the Police Uplift Programme. The vacancies within the team should be resolved by the end of the financial year once new joiners are in post and fully trained. This will provide the team with capacity to progress the Police Staff recruitment in alignment to our People Strategy.

The consultation period for Vetting Authorised Professional Practice (APP) has launched. The APP is the official national policing guidance used by Vetting departments in addition to the Codes of Practice. The aim of the new APP will be to introduce a nationally standardised vetting application form and provide new standards for forces to comply with.

III. Forward look

We anticipate that the final report of the Angiolini Inquiry³ (for Part 1) will be submitted to the Home Secretary in 2024. Part 1 had been focused on the 2 high profile MPS cases, and how they have identified missed opportunities for how conduct, behaviour and performance were dealt with, and decision making relating to vetting. Part 2 has been commissioned to address the broader issues raised by the 2 high profile MPS cases in respect of policing and the protection of women. This second part is anticipated to be submitted by the end of the year. We expect that the findings in these reviews will provide significant national recommendations for PSDs to implement.

On 31st August 2023, the Government announced plans to change disciplinary procedures to allow individual Chief Constables/Commissioners to have stronger decision making powers regarding dismissals, with appropriate delegation to Assistant Chief Constable/Commander level. This will provide Chief Officers with the responsibility to chair Misconduct Hearings rather than having a Legally Qualified Chair. These changes are anticipated to take place in Spring (April) 2024 and training for Chief Officers is being offered by the College of Policing.

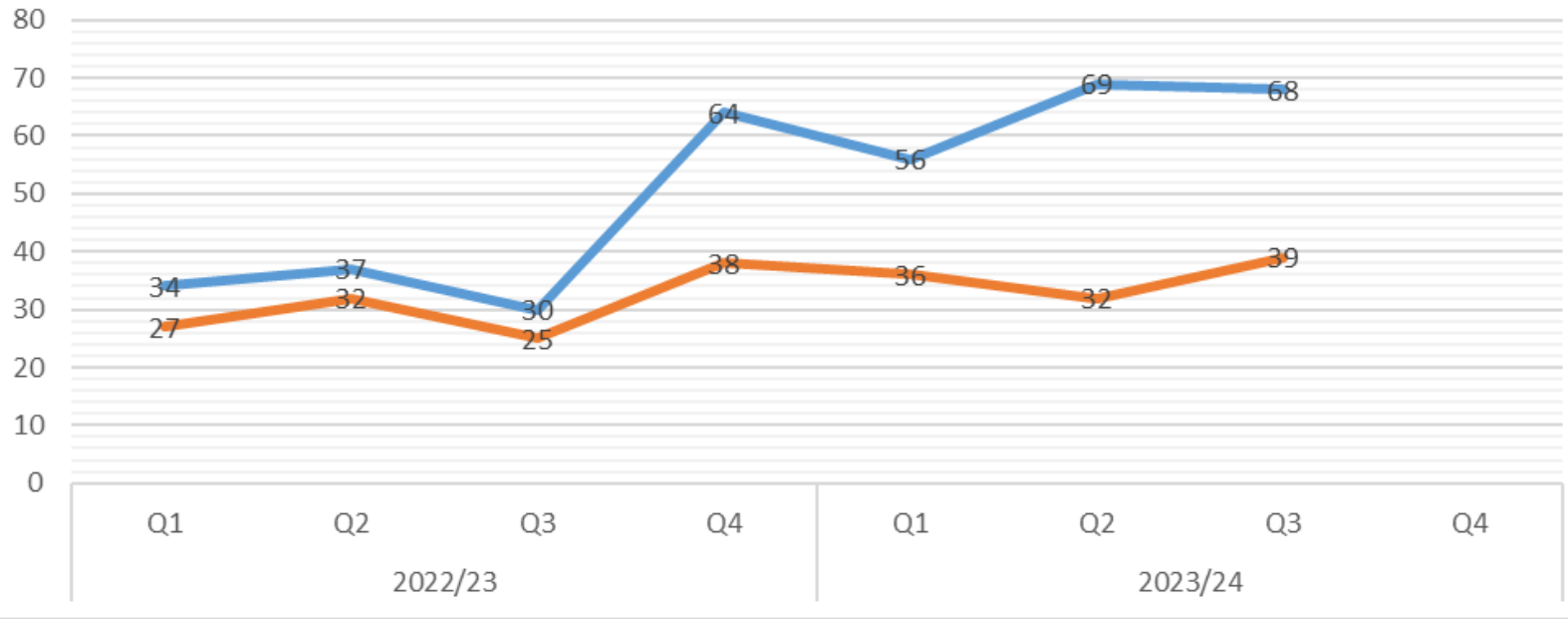
³ [The Angiolini Inquiry](#)

Summary of public complaints data – Q3 2023/24					
Metric	Current quarter (Q3)	Previous quarter (Q2)	IOPC previous quarterly bulletin (Q1)	# (%) change (Q on Q)	Comment
Complaints – Schedule 3	9	14		36%	A total of 39 cases were logged in Q3 2023/24. This is an overall increase of 7 cases from Q2 2023/24 (22%) The average number of cases logged over the previous 5 quarters is 34 per quarter, Q3 is above average.
Complaints – not Schedule 3	30	18		67%	
Allegations	68	69		1%	There were 68 allegations recorded in Q3 2023/24. This is a decrease of 1 allegation from Q2 2023/24 (1%). The average number of allegations over the previous 5 quarters is 51 per quarter. Q3 is above average.
Average time to log complaints (days)	N/A	1	1	0%	<i>Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.</i>
Average time to contact complainant (days)	N/A	3	2	50%	
Complaints finalised – Schedule 3	9	8		13%	Increase PSD overt investigation staff
Complaints finalised - not Schedule 3	24	12		100%	
Average time to finalise complaint cases (days) – Schedule 3	Case combined data average 130 days	168	97	73%	<i>Timeliness is taken from IOPC published bulletins and available retrospectively. IOPC quarterly data is combined each quarter. Case combined data average 130 days. IOPC bulletin will publish breakdown by case type logged.</i>
Average time to finalise complaint cases (days) – not Schedule 3		69	65	6%	
Applications for review sent to local policing body	0	1	1	0%	None recorded during Q3

Applications for review sent to IOPC	0	2	0	200%	None recorded during Q3
		<p>Nature of allegations – Of the 68 allegations recorded during Q3 2023/24 the highest number were in the category of Police Action following contact (8) General level of Service (7) Power to arrest /detain (6) Handling or/or damage to Property/premises (6). This is a decrease in allegations recorded against Q2 of 1 (1%).</p> <p>Allegation types Power to arrest and detain, and Use of Force have featured each quarter over the last yearly period, within the highest recorded types, and whilst Use of Force doesn't feature in the top 5 of Q3 - 5 allegations were recorded within this category. The allegation type General level of Service has also returned to the top five allegations, which featured in both the annual top 5 data 2022/23 and Q1.</p> <p>Q3 has 3 out of 5 highest allegation type categories featured.</p> <p>Ethnicity and discriminatory behaviour – 37% of complainant's ethnicity is recorded as Unknown. This is slightly higher against the previous quarter. It is very difficult to report on any trends, either locally or nationally due to insufficient CoLP or IOPC data. There was four allegations of Discriminatory Behaviour logged during this reporting period. (3 Race and 1 Religion/Belief).</p>			

City of London Complaint Data

CoLP Allegations Recorded/logged CoLP Complaints Cases Logged



Summary of internal conduct cases and investigations– Q3 2023/24				
Metric	Number	Previous quarter (Q2)	# (%) change (Q on Q)	Comment
New conduct investigations recorded	6	11	45%	
Total live conduct investigations	36	34	6%	Total live cases of which a number are sub-judice
<i>o.w. gross misconduct</i>	21	16	31%	
Conduct investigations finalised	4	3	33%	2 x Reflective practise and 2 x No case to answer
Investigations finalised within <30 days	1	1	-	
Officers and staff on suspension	14	12	17%	
Officers and staff on restricted duties	6	6	-	Includes officer under IOPC investigation
IOPC independent investigations	4	4	-	Includes Westminster attack
	<p>Accelerated misconduct meetings None held Q3</p> <p>Misconduct meetings / hearings held - None held Q3</p>			

Appendices - Public

Appendix 1- City of London- IOPC complaints bulletin – Q3

Appendix 2- Gifts and hospitality register – *is not available for this update. This is currently due to a system upgrade (old SharePoint to new Microsoft 365) currently in test phase.*

Appendix 3- Chief Officers Register of group memberships

Appendices- Non - Public

Appendix 4- Officers Suspended/ Restricted (**NON PUBLIC**)

Appendix 3 - PUBLIC

Chief Officer Team (COT) Membership of Groups

<u>Ref no</u>	<u>Date logged</u>	<u>Rank</u>	<u>Officer declaring</u>	<u>External Organisation</u>	<u>Role/Position held</u>
1	18/11/2023	Temp Commander / DCS	Oliver Shaw	Fraud Advisory Panel (FAP)	Sit on the board of Trustees as CoLP's representative (FAP is a registered charity)
2	18/11/2023	Temp Commander / DCS	Oliver Shaw	Paddington Farm Trust (PFT).	Sit on the board of Trustees (PFT is a registered charity)
3	18/01/2024	Temp Commander / DCS	Andrew Gould	Member of the Institute of Directors	Member
4	18/01/2024	Temp Commander / DCS	Andrew Gould	ISC2 (cyber security accreditation organisation)	Member
5	18/01/2024	Temp Commander / DCS	Andrew Gould	National Cyber Resilience Centre Group and London Cyber Resilience Centre Group	Non-executive Director
6	18/01/2024	Temp Commander / CSUPT	Rob Atkin	Worshipful Company of Security Professionals	Sit on Court and Trustee for charitable trust
7	18/01/2024	Temp Commander / CSUPT	Rob Atkin	UK Care of Police Survivors	Trustee
8	18/01/2024	Temp AC/ Commander	Nik Adams	London Cyber Resilience Centre	Non-Exec Director

Police Complaints Information Bulletin: City of London

Reporting Period: 01 April 2023 - 31 December 2023 (Q3 2023/24)



About this bulletin

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

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

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Page 5 Section A2: Allegations timeliness

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Acronyms used in this bulletin

Force – Year to date force numbers, **SPLY** - Same period last year, **MSF** - Most similar force, **LPB** - Local policing body, **PRA** - Police Reform Act 2002, **Inc.** – Including

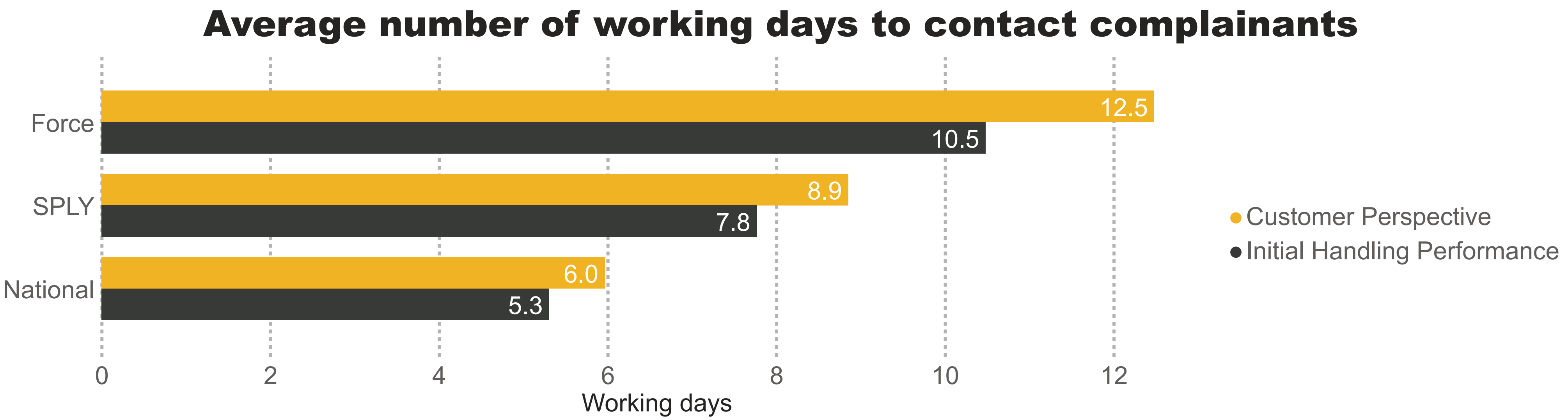
Ind – independent Investigation, **Nat.** – National, **No.** – Number, **RPRP** – Reflective Practice Review Process, **UPP** – Unsatisfactory Performance Procedure

Section A1.1: Complaint cases logged and initial handling

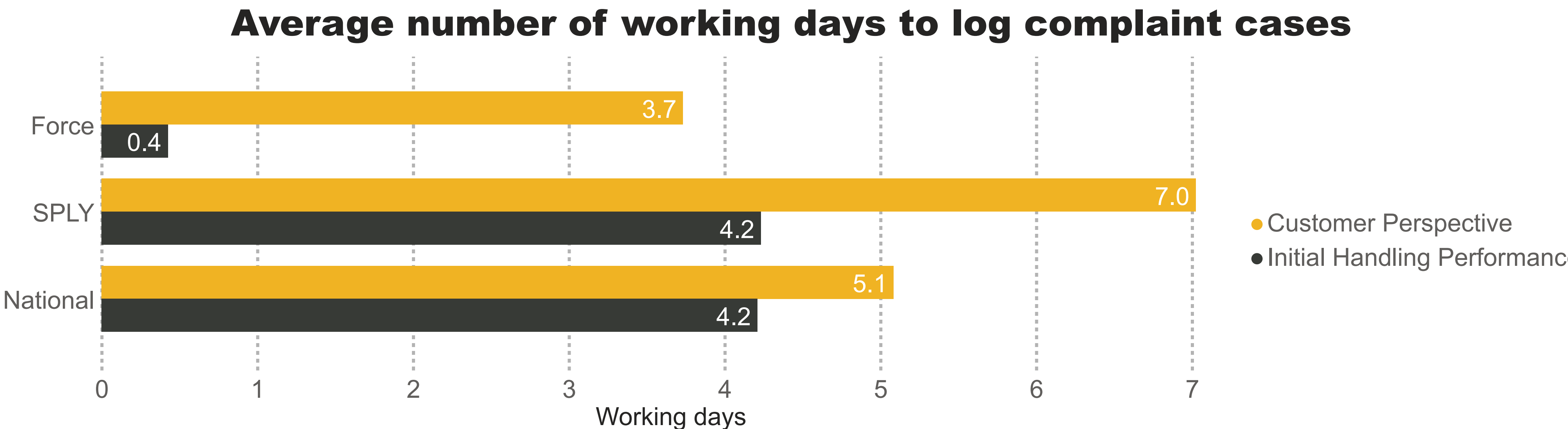
This section presents information relating to the force’s contact with customers and their initial handling of the complaint cases. It shows how long, on average, it takes from the customer’s perspective from when they made the complaint and the force’s performance of the initial handling from when it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

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

Average number of working days to contact complainants	Customer perspective	Initial handling performance
Force	12	10
SPLY	9	8
National	6	5



Average number of working days to log complaint cases	Customer perspective	Initial handling performance
Force	4	0
SPLY	7	4
National	5	4



Complaint cases logged

	Force	SPLY	National
Complaint cases logged	108	82	62,963
Complaint cases logged per 1,000 employees	69	57	249

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

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

Reason complaint case recorded under Schedule 3	Force		SPLY		National	
	No.	%	No.	%	No.	%
AA/body responsible for initial handling decides	15	43 %	14	61 %	10,304	43 %
Complainant wishes the complaint be recorded	1	3 %	0	0 %	5,003	21 %
Dissatisfaction after initial handling	3	9 %	4	17 %	3,400	14 %
Nature of the allegation(s) in the complaint	16	46 %	5	22 %	5,131	22 %

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

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

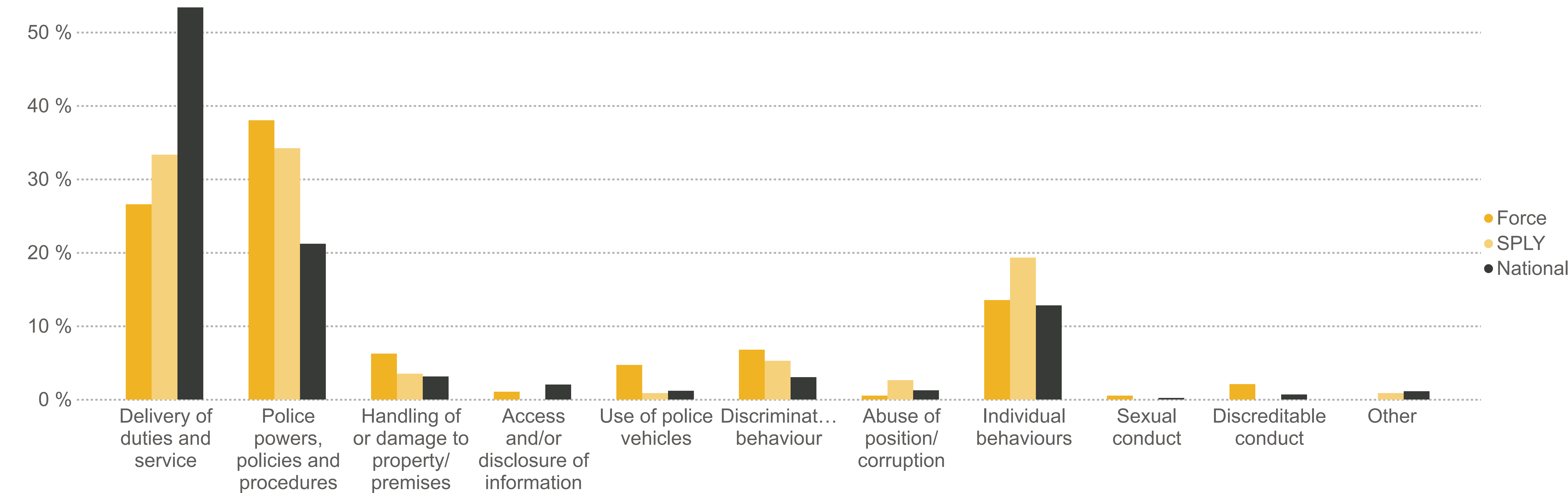
Please refer to our [Guidance on capturing data about police complaints](#) for guidance on logging allegations and complaint category definitions.

Allegations logged

	Force	SPLY	National
Allegations Logged	192	114	110,331
Allegations logged per 1,000 employees	124	79	436

What has been complained about

	Delivery of duties and service	Police powers, policies and procedures	Handling of or damage to property/premises	Access and/or disclosure of information	Use of police vehicles	Discriminatory behaviour	Abuse of position/corruption	Individual behaviours	Sexual conduct	Discreditable conduct	Other	Total
Force	51	73	12	2	9	13	1	26	1	4	0	192
SPLY	38	39	4	0	1	6	3	22	0	0	1	114
National	58,911	23,380	3,456	2,234	1,300	3,346	1,359	14,123	233	757	1,231	110,330
Force	27 %	38 %	6 %	1 %	5 %	7 %	1 %	14 %	1 %	2 %	0 %	100 %
SPLY	33 %	34 %	4 %	0 %	1 %	5 %	3 %	19 %	0 %	0 %	1 %	100 %
National	53 %	21 %	3 %	2 %	1 %	3 %	1 %	13 %	0 %	1 %	1 %	100 %



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

This section presents the five most commonly recorded categories for allegations that have been logged.
 A complaint case will contain one or more allegations and one category (and sub-category, where available) is selected for each allegation logged.
 Total % is of the total number of allegations logged.
 Allegations where the subcategory is 'none' are omitted from this table.

Category	Subcategory	Force		SPLY		National		
		No.	%	No.	%	No.	%	
Delivery of duties and service	Total	51	27 %	38	33 %	58,907	53 %	
	Police action following contact	15	29 %	15	39 %	25,213	43 %	
	Decisions	7	14 %	5	13 %	7,833	13 %	
	General level of service	19	37 %	13	34 %	19,902	34 %	
	Information	10	20 %	5	13 %	5,959	10 %	
Police powers, policies and procedures	Total	73	38 %	39	34 %	23,375	21 %	
	Stops, and stop and search	7	10 %	2	5 %	1,272	5 %	
	Searches of premises and seizure of property	10	14 %	9	23 %	2,811	12 %	
	Power to arrest and detain	16	22 %	10	26 %	3,940	17 %	
	Detention in police custody	7	10 %	6	15 %	3,190	14 %	
	Bail, identification and interview procedures	0	0 %	1	3 %	1,146	5 %	
	Use of force	27	37 %	9	23 %	6,209	27 %	
	Evidential procedures	4	5 %	0	0 %	1,772	8 %	
	Out of court disposals	1	1 %	0	0 %	385	2 %	
	Other policies and procedures	1	1 %	2	5 %	2,649	11 %	
	Other	0	0 %	0	0 %	1	0 %	
	Handling of or damage to property/ premises	Total	12	6 %	4	4 %	3,327	3 %
		Handling of or damage to property/ premises	12	100 %	4	100 %	3,326	96 %
		General level of service	0	0 %	0	0 %	1	0 %
Discriminatory behaviour	Total	13	7 %	6	5 %	3,346	3 %	
	Age	0	0 %	0	0 %	59	2 %	
	Disability	0	0 %	1	17 %	601	18 %	
	Gender reassignment	0	0 %	0	0 %	28	1 %	
	Marriage and civil partnership	0	0 %	0	0 %	3	0 %	
	Pregnancy and maternity	0	0 %	0	0 %	1	0 %	
	Race	11	85 %	3	50 %	1,689	50 %	
	Religion or belief	2	15 %	2	33 %	91	3 %	
	Sex	0	0 %	0	0 %	479	14 %	
	Sexual orientation	0	0 %	0	0 %	119	4 %	
	Other	0	0 %	0	0 %	276	8 %	
Individual behaviours	Total	26	14 %	22	19 %	14,122	13 %	
	Unprofessional attitude and disrespect	14	54 %	17	77 %	4,046	29 %	
	Lack of fairness and impartiality	1	4 %	0	0 %	1,894	13 %	
	Overbearing or harassing behaviours	2	8 %	2	9 %	2,519	18 %	
	Impolite language / tone	9	35 %	2	9 %	3,672	26 %	
	Impolite and intolerant actions	0	0 %	1	5 %	1,991	14 %	

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

Factors	Allegation category											
	Delivery of duties and service	Police powers, policies and procedures	Handling of or damage to property/premises	Access and/or disclosure of information	Use of police vehicles	Discriminatory behaviour	Abuse of position/corruption	Individual behaviours	Sexual conduct	Discreditable conduct	Other	Total
Arrest	0	18	2	0	0	0	0	2	0	0	0	22
Call Handling	0	0	0	0	0	0	0	1	0	0	0	1
Child protection / CSA / CSE	0	0	0	0	0	0	0	1	0	0	0	1
Custody	0	6	1	0	0	0	0	0	0	0	0	7
Domestic / gender abuse	1	1	0	0	0	0	0	1	0	0	0	3
Firearms	0	2	0	0	0	0	0	0	0	0	0	2
Fraud	5	1	0	0	0	1	0	0	0	0	0	7
Investigation	16	9	1	1	0	3	0	5	0	0	0	35
Mental health	2	1	0	0	0	0	0	1	0	0	0	4
Neighbourhood policing	1	0	0	0	0	0	0	0	0	0	0	1
None	18	12	5	0	2	6	1	11	0	3	0	58
Premises search	0	4	1	0	0	0	0	1	0	0	0	6
Public order incident	4	0	0	0	0	0	0	0	0	0	0	4
Restraint equipment	0	5	0	0	0	0	0	0	0	0	0	5
Roads/traffic	4	10	2	0	7	4	0	4	0	0	0	31
Stop and/or search	0	4	0	0	0	0	0	0	0	0	0	4
VAWG - dissatisfaction handling	1	0	0	0	0	0	0	0	0	0	0	1
VAWG - police perpetrated	0	1	0	0	0	0	0	0	1	0	0	2

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

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

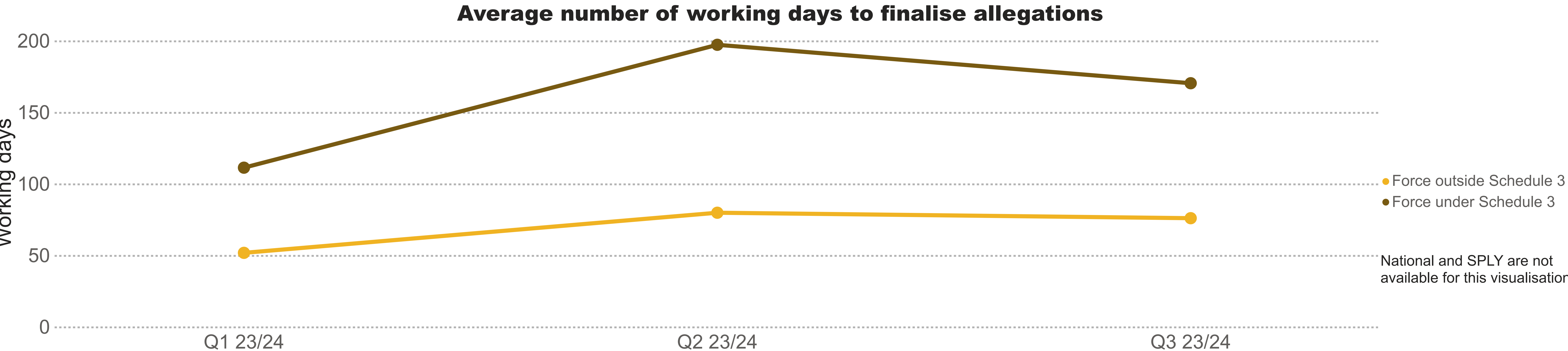
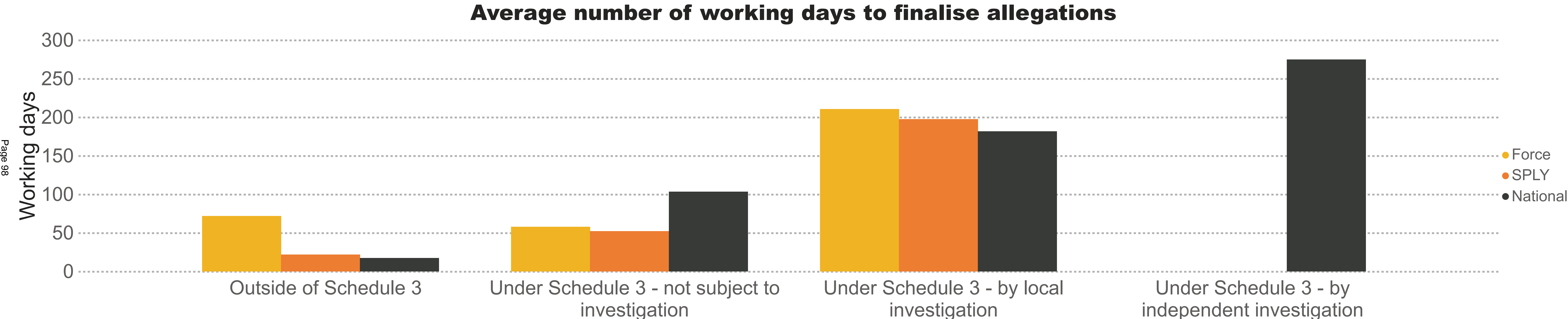
Section A2: Allegations timeliness

Average number of working days to finalise allegations	Force	SPLY	National
Outside of Schedule 3	72	22	18
Under Schedule 3 - not subject to investigation	58	52	103
Under Schedule 3 - by local investigation	210	197	182
Under Schedule 3 - by directed investigation	0	0	0
Under Schedule 3 - by independent investigation	0	0	275

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

Independent investigation figures do not include conduct or death/serious injury investigations which are also investigated by the IOPC.

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



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

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

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

Please refer to our [Guidance on capturing data about police complaints](#) for details of allegation decisions.

How allegations were handled	Force No.	Force %	National No.	National %
Under Schedule 3 investigated (not subject to special procedures)	30	23 %	12,221	12 %
Under Schedule 3 investigated (subject to special procedures)	6	5 %	1,393	1 %
Under Schedule 3 - not investigated	13	10 %	45,603	44 %
Outside of Schedule 3	82	63 %	44,072	43 %
Total	131	100 %	103,289	100 %

How allegations were handled	Outside of Schedule 3				Under Schedule 3 - not investigated				Under Schedule 3 investigated (subject to special procedures)				Under Schedule 3 investigated (not subject to special procedures)			
	Force %	Force No.	Nat. %	Nat. No.	Force %	Force No.	Nat. %	Nat. No.	Force %	Force No.	Nat. %	Nat. No.	Force %	Force No.	Nat. %	Nat. No.
Allegation decision																
No further action					54 %	7	9 %	3,928			0 %	5	87 %	26	4 %	489
Regulation 41 applies							0 %	112			0 %	5			1 %	79
Service provided - unable to determine							8 %	3,573			2 %	30			8 %	1,018
Service provided - not acceptable					8 %	1	13 %	5,989			5 %	69	3 %	1	12 %	1,423
Service provided - acceptable					38 %	5	67 %	30,569			26 %	358	10 %	3	72 %	8,812
Not Resolved	16 %	13	7 %	3,153												
Resolved	84 %	69	93 %	40,919												
No Case to Answer									83 %	5	39 %	549				
Case to Answer									17 %	1	25 %	352				
Withdrawal							3 %	1,432			2 %	25			3 %	400
Total	63 %	82	43 %	44,072	10 %	13	44 %	45,603	5 %	6	1 %	1,393	23 %	30	12 %	12,221

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

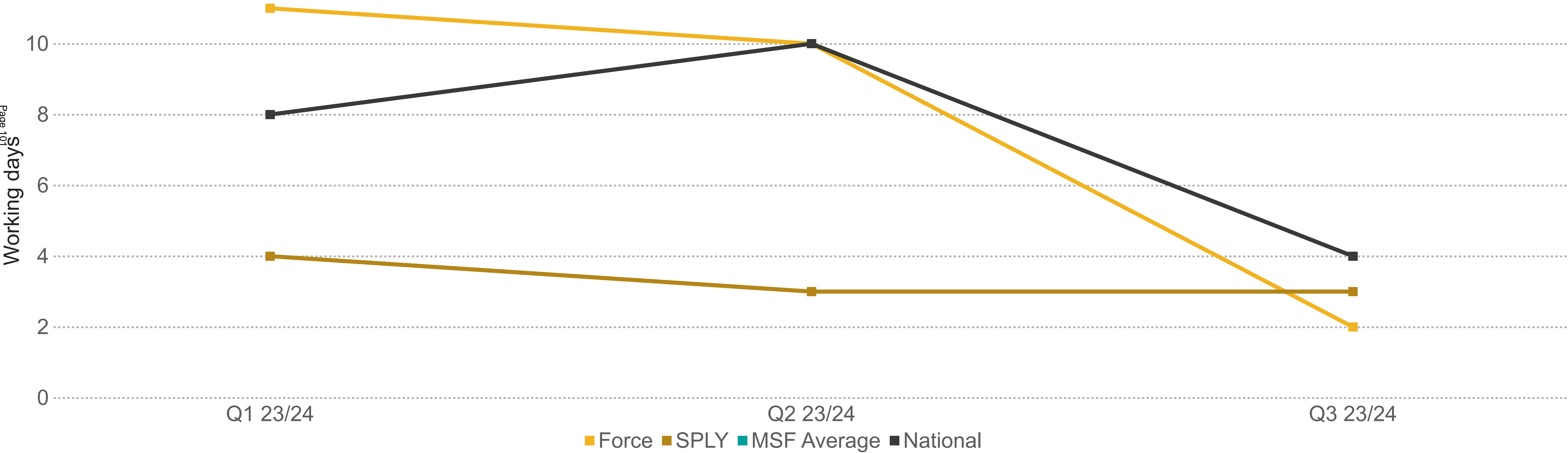
This section presents information about allegations handled both informally and formally, grouped by the allegation decision and the category selected on each allegation. Each allegation has a single category selected.

Allegation category												
Allegation decisions	Delivery of duties and service	Police powers, policies and procedures	Handling of or damage to property/premises	Access and/or disclosure of information	Use of police vehicles	Discriminatory behaviour	Abuse of position/corruption	Individual behaviours	Sexual conduct	Discreditable conduct	Other	Total
No further action	6	20	1	0	0	3	0	2	1	0	0	33
Regulation 41 applies	0	0	0	0	0	0	0	0	0	0	0	0
Service provided - unable to determine	0	0	0	0	0	0	0	0	0	0	0	0
Service provided - not acceptable	2	0	0	0	0	0	0	0	0	0	0	2
Service provided - acceptable	2	2	0	0	0	3	0	0	1	0	0	8
Not Resolved	5	3	0	0	2	1	0	2	0	0	0	13
Resolved	26	21	6	0	3	3	0	10	0	0	0	69
No Case to Answer	0	3	0	0	0	0	0	2	0	0	0	5
Case to Answer	0	0	0	0	0	0	0	1	0	0	0	1
Withdrawal	0	0	0	0	0	0	0	0	0	0	0	0

Section B: Referrals

	Force	SPLY	National
Number referrals received	26	17	5,160
Number referrals completed	26	17	5,170
Decision: Independent Investigation	3	3	308
Decision: Directed Investigation	0	0	27
Decision: Local Investigation	19	13	3,387
Decision: Return to Force	4	1	1,363
Decision: Invalid	0	0	84

Average number of working days to complete referrals by quarter



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

When the IOPC receives a referral from the force, it reviews the information they have provided. The IOPC decides whether the matter requires an investigation, and the type of investigation. Referrals may have been completed in a different period to when they were received.

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

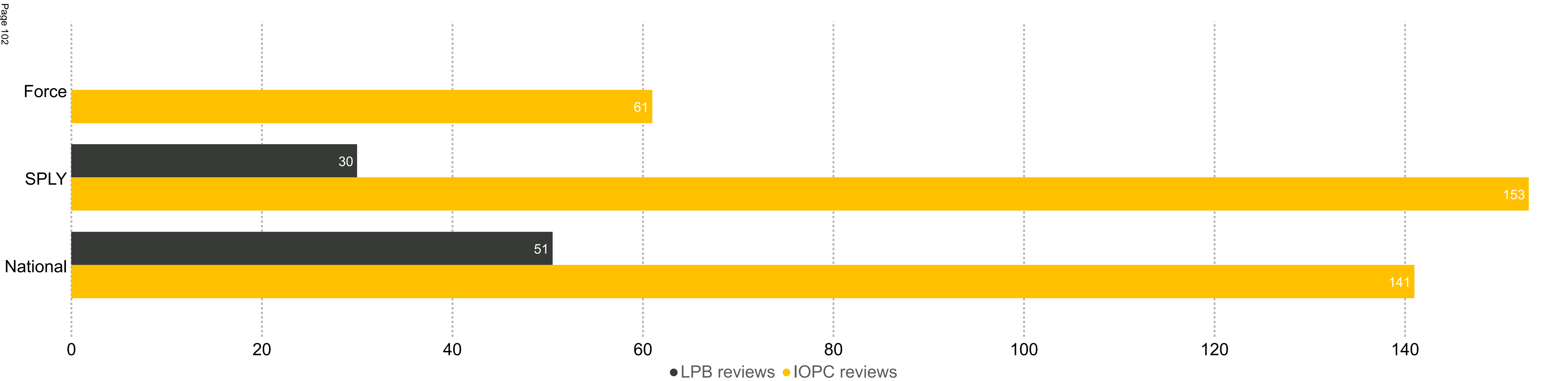
The sum of decisions may not match the number of referrals completed. This is because some matters referred may have come to the attention of the appropriate authority before 1 February 2020 and have investigation type decisions of either managed or supervised.

Section C1: Reviews received

	Complaint cases finalised under Schedule 3	Reviews received	Reviews received as proportion of complaint cases finalised under Schedule 3	Number LPB reviews received - investigation	Number LPB reviews received - non-investigation	Number IOPC reviews received - investigation	Number IOPC reviews received - non-investigation
Force	19	6	32 %	0	1	3	2
SPLY	22	4	18 %	0	2	1	1
National	22,597	4,729	21 %	340	2,857	621	911

Section C2: Reviews timeliness

	Force	SPLY	National
Average number of working days to complete Local Policing Body reviews	0	30	51
Average number of working days to complete IOPC reviews	61	153	141



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

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

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

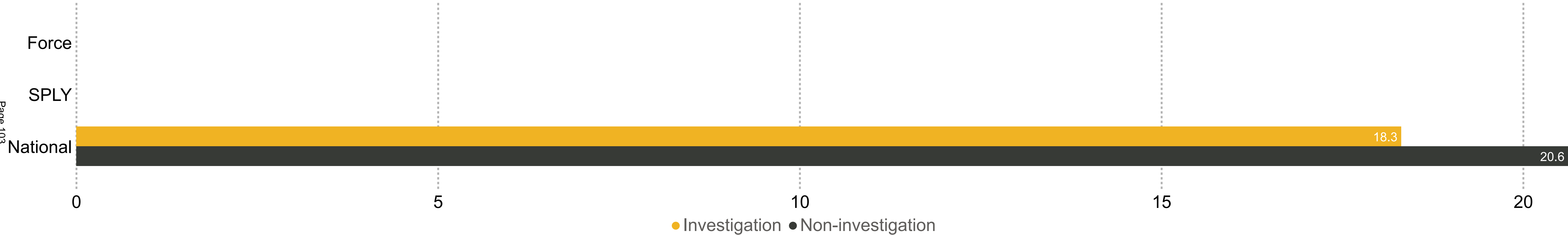
Reviews with ‘invalid dates’ have been removed from reviews timeliness. Please refer to the performance framework counting rules and calculations on the IOPC website for an explanation of invalid dates.

Section C3: Decisions on LPB reviews

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

LPB reviews found not reasonable and proportionate

Force	Investigation			Non-investigation		
	Valid completed reviews	Found not reasonable and proportionate	% found not reasonable and proportionate	Valid completed reviews	Found not reasonable and proportionate	% found not reasonable and proportionate
Force	0		0	0		0
SPLY	1		0	0		0
National	273	50	18	2,754	568	21



LPB reviews resulting in recommendations

Force	Investigation			Non-investigation		
	Found not reasonable and proportionate	Resulting in recommendations	% resulting in recommendations	Found not reasonable and proportionate	Resulting in recommendations	% resulting in recommendations
Force			0			0
SPLY			0			0
National	50	50	100	568	487	86

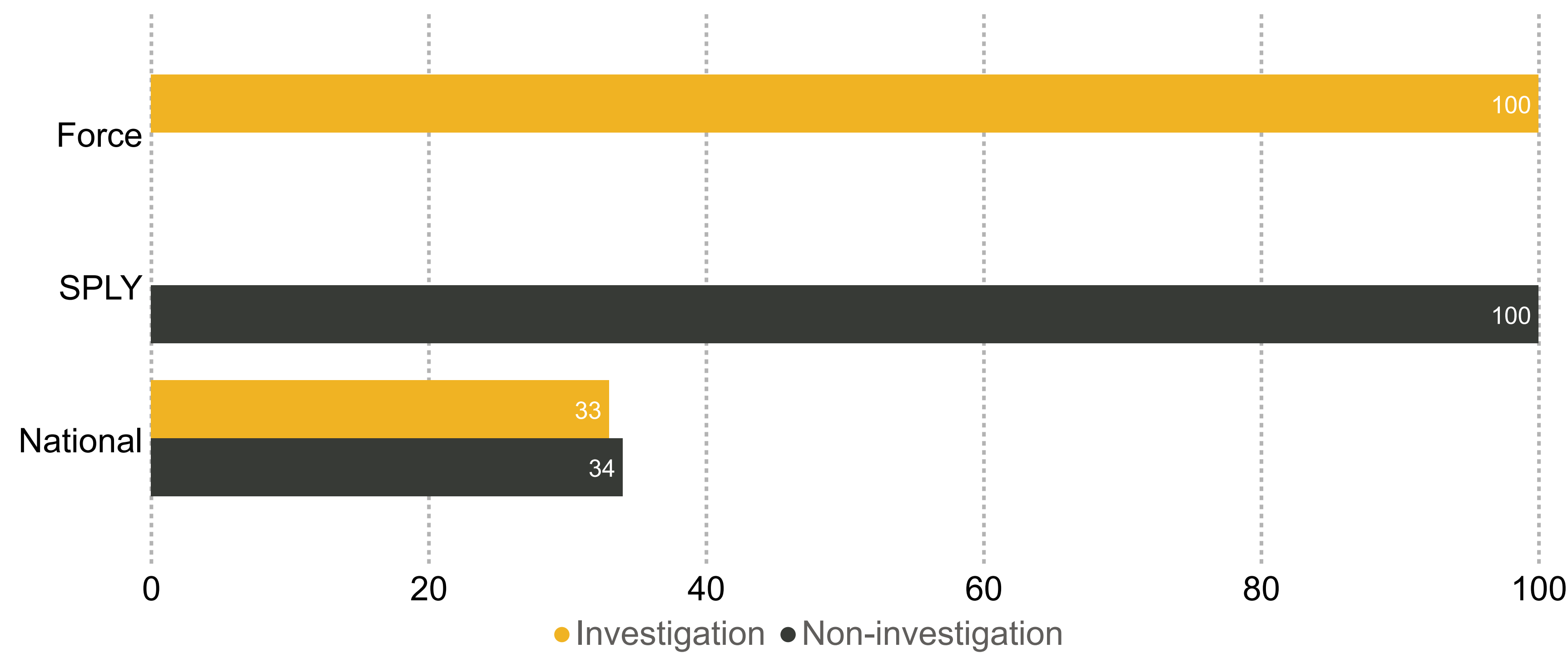
Section C4: Decisions on IOPC reviews

This section presents information about the decisions made on reviews including the proportion of reviews that found the outcome of the complaint was not reasonable and proportionate, those which resulted in a recommendation and, if necessary, a direction to the appropriate authority in respect of any person serving with the police.

IOPC reviews found not reasonable and proportionate

Investigation	Valid completed reviews	Outcome found not reasonable and proportionate
Force	1	1
SPLY	0	0
National	625	205

% IOPC reviews found outcome not reasonable and proportionate



Non-investigation	Valid completed reviews	Outcome found not reasonable and proportionate
Force	1	0
SPLY	1	1
National	930	315

IOPC review recommendations and directions

Investigation	Outcome found not reasonable and proportionate	Recommendations made	Directions made	% resulting in direction
Force	1	0	0	0
SPLY	0	0	0	0
National	205	17	131	64

Non-investigation	Outcome found not reasonable and proportionate	Directions made	% resulting in direction
Force	0	0	0
SPLY	1	1	100
National	315	202	64

IOPC recommendations figures include only those relating to subject outcomes, LPBs can also recommend remedial outcomes.

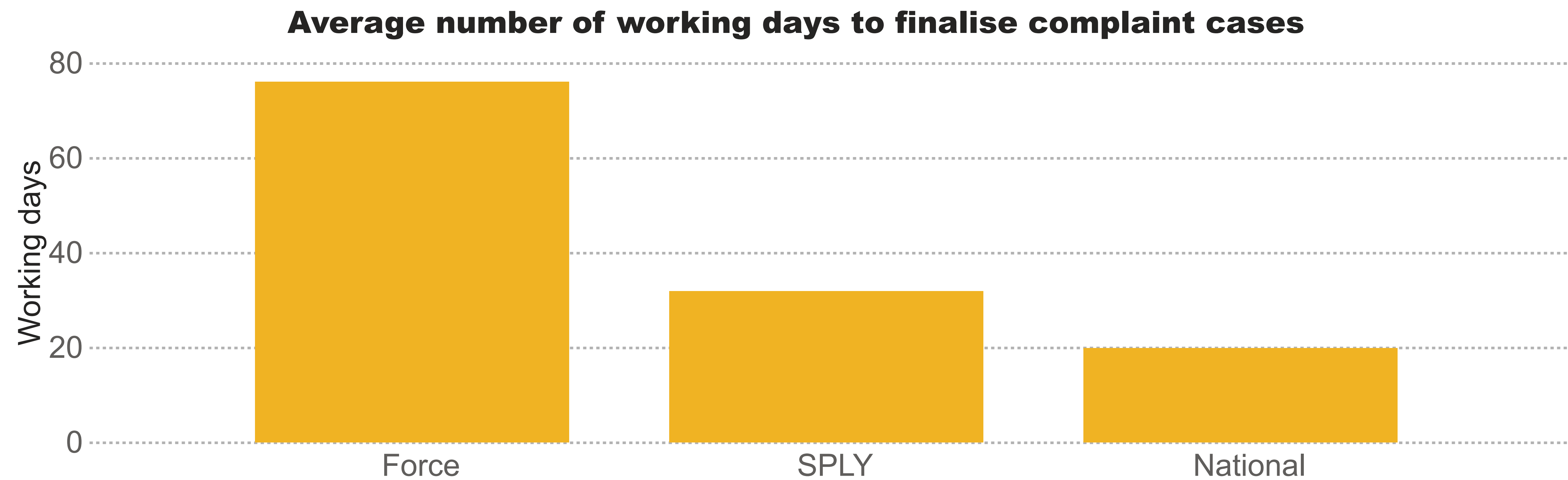
Section D1.1: Complaint cases finalised outside of Schedule 3 - timeliness

Average number of working days to finalise complaint cases

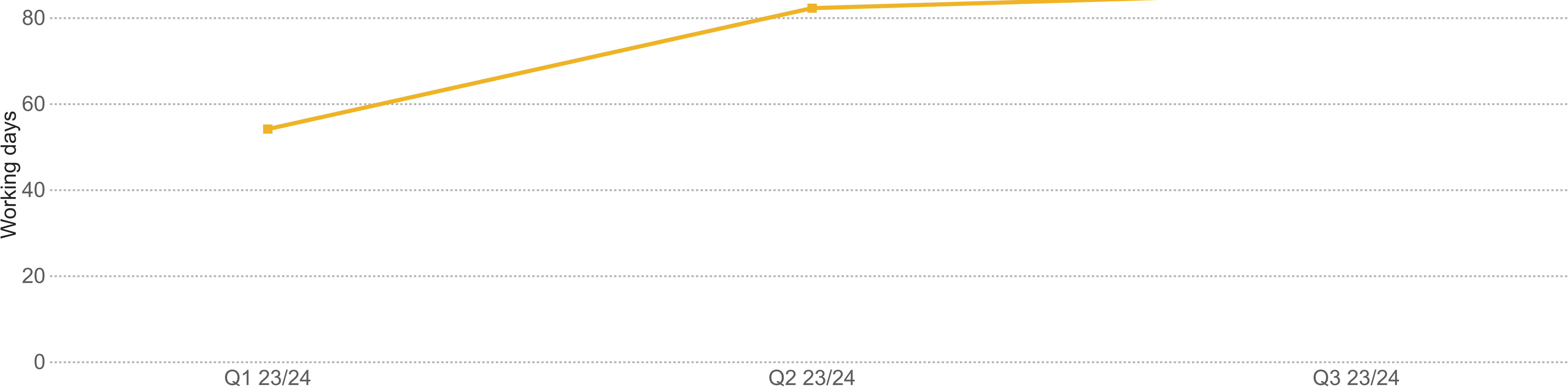
Force	SPLY	National
76	32	20

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

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



Average number of working days to finalise complaint cases by quarter



National and SPLY are not available for this visualisation.

Section D1.2: Complaint cases finalised under Schedule 3 - timeliness

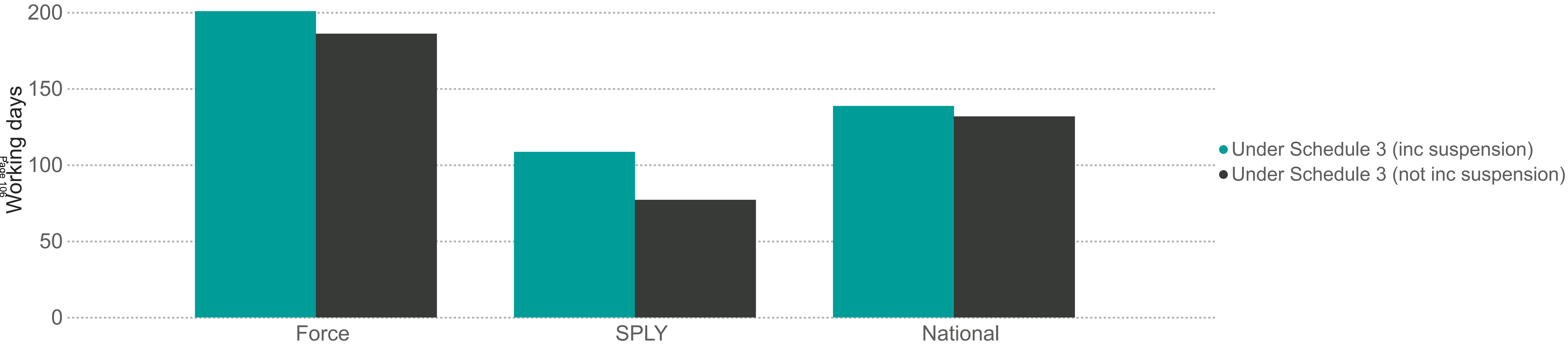
Average number of working days to finalise complaint cases

	Force	SPLY	National
Under Schedule 3 (inc suspension)	201	109	139
Under Schedule 3 (not inc suspension)	186	77	132

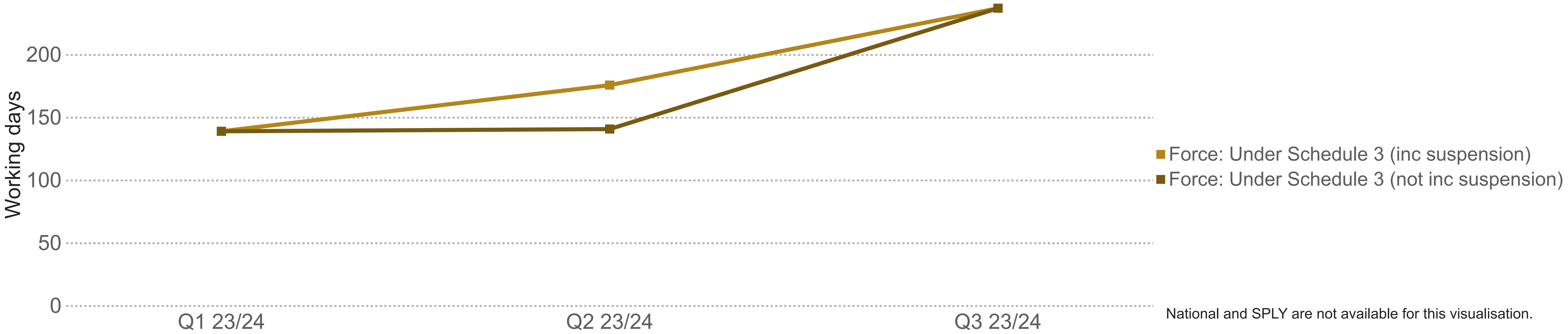
This section shows the time it takes the force to finalise complaint cases from the customer's perspective. It gives a breakdown of the time taken to finalise complaint cases handled formally under Schedule 3. Timeliness is calculated from the date the complaint was made.

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

Average number of working days to finalise complaint cases



Average number of working days to finalise complaint cases by quarter



National and SPLY are not available for this visualisation.

Section D2.1: Allegation actions - on complaint cases handled outside of Schedule 3

Actions following outside of Schedule 3 complaint cases	Force		SPLY		National	
	No.	%	No.	%	No.	%
Organisational learning	1	2 %	0	0 %	119	0 %
Learning from reflection	1	2 %	0	0 %	923	2 %
Policy review	0	0 %	0	0 %	25	0 %
Goodwill gesture	0	0 %	0	0 %	80	0 %
Apology	3	6 %	3	6 %	3528	9 %
Debrief	1	2 %	0	0 %	321	1 %
Explanation	27	55 %	43	86 %	21805	59 %
No further action	18	37 %	2	4 %	5409	15 %
Other action	0	0 %	2	4 %	3816	10 %

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

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

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

Section D2.2: Allegation actions - on complaint cases handled under Schedule 3

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

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

All complaint cases handled under Schedule 3

Complaint cases resulting in below actions	Force		SPLY		National	
	No.	%	No.	%	No.	%
Organisational learning	0	0 %	0	0 %	497	2 %
Apology	1	5 %	1	5 %	1266	6 %
Debrief	0	0 %	0	0 %	261	1 %
Explanation	1	5 %	9	41 %	12746	56 %
Criminal proceedings	0	0 %	0	0 %	2	0 %
Unsatisfactory Performance Procedure (UPP)	0	0 %	0	0 %	17	0 %
No further action	14	74 %	8	36 %	7035	31 %
Other action	1	5 %	0	0 %	532	2 %
Learning from reflection	2	11 %	1	5 %	2448	11 %
Referral to RPRP	2	11 %	5	23 %	674	3 %

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

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

Complaint cases resulting in below actions	Force		SPLY		National	
	No.	%	No.	%	No.	%
Misconduct proceedings	0	0 %	1	25 %	99	25 %
Criminal proceedings	0	0 %	0	0 %	2	1 %
Unsatisfactory Performance Procedure (UPP)	0	0 %	0	0 %	4	1 %
Other actions following a case to answer decision	0	0 %	0	0 %	16	4 %
Referral to RPRP	1	100 %	2	50 %	114	29 %

Notes

Data sources

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

Performance Framework counting rules and calculation

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

Data constraints

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

Further Information

- A glossary providing a full list of definitions used in this bulletin, can be found on the [IOPC website](#).
- Additional information about the recording of police complaints, including the definitions of the complaint categories, can be found in appendix A of the IOPC's [Guidance on capturing data about police complaints](#).
- Information about how the police complaints system operates, who can complain and how reviews are dealt with can be found in the IOPC's [Statutory Guidance on the police complaints system \(February 2020\)](#).

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Agenda Item 9

Committee(s): Professional Standards and Integrity Committee Police Authority Board	Dated: 27 February 2024 6 March 2024
Subject: College of Policing’s Code of Practice for ethical Policing – ‘The Code of Ethics’ Implementation at City of London Police.	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_29-24	For Information
Report author: Rob Atkin MBE, T/Commander	

Summary

This report outlines the changes to the new Code of Ethics (CoE) for policing which was launched on 24th January 2024. The report outlines the opportunities that this presents for the City of London Police (CoLP) in furtherance of its work already being undertaken in relation to supporting equality, diversity & inclusion, officer & staff wellbeing, conduct and professional practice improvements and importantly to support all our staff and volunteers to do the right thing. A well embedded CoE also has significant benefits in improving policing encounters (e.g., stop & search) with members of the public and overall service provision. This builds on the previous CoE which was developed in 2014 and was the first statutory Code of Practice issued by the College, following its establishment as the first professional body for policing. The development of the Code was considered to be an important step in aligning the College to other professional organisations, most of which have codes of ethics. Since 2014 the CoLP has been working to the previous CoE and is well established within Force underpinning policy, process, and ways of working.

The new CoE presents an opportunity for the Force to build on existing work undertaken in relation to ethical policing and decision making and embed across the working practices and culture of the CoLP which will include the development of an Ethics Board.

Appendix 4 details a high-level draft plan on a page of work to embed the code with CoLP Officers, Staff & Volunteers and across the full range of our policies, processes, meeting structures & external scrutiny. There is now an internal CoE Delivery Group which is overseeing the embedding of the new CoE in CoLP.

This work is being led by Rob Atkin, T/Commander.

Recommendation(s)

Members are asked to:

1. Note the content of this report and the new code of ethics launched by the College of Policing on 24th January 2024.
2. Note the three supporting web links to relevant documents (Appendices 1-3) **The Code of Practice for Ethical Policing; Ethical Policing Principles; Guidance for Ethical Behaviour in Policing;** and
3. Note the Code of Practice for Ethical Policing will place the requirement to implement and embed ethical policing onto a statutory footing for Chief officers and will form part of HMICFRS inspections from 2025.

Main Report

Background

1. The current code of ethics (CoE) was introduced by the College of Policing in 2014 and was laid before parliament as a code of practice and has a legal status and applies to all police areas of England & Wales as defined by section 1 of the Police act 1996 and relates specifically to all chief officers in the discharge of their functions.
2. The 2014 codes enabled policing to clearly lay out the expectations of every member of the profession and the expectation was that 'every person working in policing would adopt the code as their personal guide to the principles they are expected to uphold and the standards of behaviour they are required to meet'. It was also an important step in aligning policing with other professions, many of which had established codes of ethics. The 2014 codes used the Nolan Principles (the seven principles of public life) as the framework for the code with the additions of fairness and respect also being added, resulting in a CoE with nine policing principles (accountability, fairness, honesty, integrity, leadership, objectivity, openness, respect & selflessness) which were overlaid with the standards of professional behaviour.
3. The previous CoE is well embedded across the City of London Police and is evident in our policies, procedures, and processes. The previous CoE for example is utilised by officers and staff as part of the application of the National Decision-Making Model¹, it also forms part of assessments for promotion, recruitment and as part of organisational debriefs. The launch of the new CoE presents an opportunity for the CoLP to further build on that work and to further embed ethical decision making and behaviours across the Force.

Current Position

4. A review of the current CoE was commenced by the College of Policing in 2021 with a series of public consultation events, evidence reviews, best practice in other organisations and arguably most importantly consultation with a wide spectrum of officers, police staff, volunteers, stakeholders & third

¹ [National decision model | College of Policing](#)

parties. This has resulted in a CoE being launched on 24th January 2024 which has been truly shaped by the service and seeks to address issues that were identified with the previous CoE namely:

- i) Previous code consisted of 10 chapters under the headings of professional behaviour which came from Police Conduct Regulations. An outcome of this was that the previous CoE was seen as a conduct document and not a document that helps people do the right thing or focus on ethical decision making. There have been cases where Police Officers have wrongly been 'charged' with breaching the Code of Ethics. This has further cemented the view the previous CoE was a conduct document and not one used to guide ethical decisions and help people do the right thing.
- ii) Policing found it difficult to identify with how the seven Nolan principles of public life plus fairness & respect were articulated so there was a disconnect between how staff viewed the CoE and how they made their daily decisions.
- iii) The current CoE was viewed as punitive and reached for when something has gone wrong rather than using the code to guide decision making going forwards. It was not seen as encouraging openness, reflective behaviour and creating a culture of continuous learning.
- iv) Nationally, the CoE was viewed as being applicable to Police Officers rather than Police Staff; many police staff did not view the CoE as relevant to their work even though it was promoted to all.
- v) Chief Officers perceived the previous CoE as being unclear on the specifics of what was required to run an ethical organisation.
- vi) The aim of the new code is to help officers and staff to do the right thing rather than holding them accountable when things go wrong.

5. The new CoE is in three component parts.

- i) **A Code of Practice for Ethical Policing** (Link at Appendix 1) which sets out for Chief Officers "the actions they should carry out to ensure how they should lead an ethical culture and where staff are supported and directed to use the ethical principles in decision making and demonstrate professional behaviour". It is a statutory document, meaning that police Chief Officers have a legal duty to 'have regard' to it when discharging their functions. However, it does not alter the existing legal powers and responsibilities of Chief Officers or alter existing regulations about police (mis)conduct. Instead, it is intended to set out general and specific expectations, as well as information and guidance, on how Chief Officers should work within these frameworks to safeguard and proactively promote ethical policing. While Chief Officers are ultimately accountable, the Code covers the work of 'everyone in policing' – i.e. officers, permanent staff, PCSOs, Special Constables, volunteers, and contractors and contracted service providers.

- It also describes what proactive action is required in response to misconduct and corruption. The code has statutory standing and covers requirement in relation to:
- How to ensure internal and external ethical behaviours
- Public service expectations
- Creating a culture where unprofessional behaviour is challenged.
- Staff welfare is well managed.
- Ensuring openness and candour
- continuing professional development for staff and recognising and responding to misconduct.

ii) **Ethical Policing Principles** (Link at Appendix 2) – this document sets out the new CoE principles namely **Courage, Respect and Empathy and Public Service** and under each principle clearly sets out how officers and staff demonstrate each principle with key behaviours detailed in clearly defined language. A summary is detailed below: The aim of the document is to help Police Officers and Staff to make the right decisions and actions.

Doing the Right Thing

In the Right Way

For the Right Reason

Courage

- Taking responsibility
- Setting an example
- Challenging unprofessional behaviour and practice
- Being honest, open, and accountable
- Encouraging feedback and scrutiny

Respect and empathy

- Listening with care and respect
- Listening to and understanding different perspectives
- Understanding the impact of emotions and welfare
- Responding to individual needs
- Being fair and impartial

Public service

- Delivering a service to be proud of
- Acting lawfully
- Understanding and responding to community needs
- Reflecting on and applying knowledge and experience
- Improving our self, our peers and profession

iii) **Guidance for Ethical and Professional Behaviour in Policing** (Link at Appendix 3) This document brings the ethical policing principles alive for staff with practical examples and considerations and covers areas such as relationships, social media and wellness and wellbeing in the workplace. The document sets out the expectations for ethical & professional behaviour. The document seeks to promote a positive workplace culture and importantly it uses inclusive and positive language to give clarity about:

- Being a member of the policing profession
- Being open, honest & candid
- Fairness & respect
- Decision making
- Recognising the opportunity to learn

- Challenging unprofessional behaviour
 - When behaviour does not meet expectations
6. **Relevance of the new CoE to misconduct proceedings** It is important to note that the CoE is **not** the standard, it is guidance with the same status as other guidance produced by the College of Policing. The guidance describes how policing professionals should behave, in a way that makes it easy for them to understand those expectations and avoid unprofessional behaviour. Where the CoE is not followed, it **may** provide evidence towards an assessment of misconduct in the same way as other policy or guidance. There are references of CoE in both Home Office Guidance and Police Conduct Regulations- the Home Office will be updating these to ensure clarity on how CoE is used going forward. CoLP Professional Standards Unit should still have 'regard to', 'inform assessments', be 'partly guided by' the CoE in misconduct assessments.
 7. Nationally work has also being undertaken to enhance the understanding of Digital and Data Ethics including biometrics, digital forensics, surveillance & investigatory powers, artificial intelligence, digital public contact development, robotic automation, the use of numerous algorithms, and the ethical procurement of technology. These are currently across a range of national workstreams. To look at ethical issues and dilemmas in these areas it has been agreed that nationally the Biometric Forensics Ethics Group (BFEG) will undertake this function. Work is currently underway to agree how such dilemmas will be referred to this committee from Forces via the National Police Ethics Committee.
 8. There is currently no formulated Ethics Board in CoLP, however, CoLP was previously part of an arrangement with the MPS Ethics Panel which is no longer running. Ethics Boards are a tested method of testing organisational leadership, decision making, policy & practice. Members may wish to note the work which is being commenced to look at best practice nationally and commence a City of London Police Ethics Board which will further embed the new Code of Ethics across the work of the CoLP
 9. A new framework will be provided by the National Portfolio to forces utilising the new Code of Practice to assist us in considering our own ethical structures and how we as a force best enhance the delivery of an ethical organisation. It is likely that in future ethical structures and how the Code of Practice has been implemented in forces will be considered as part of PEEL Inspections from 2025 onwards.

Embedding the new Code of Ethics in the City of London Police

10. There is a significant opportunity for the CoLP to use the new CoE to enhance and inform significant work that is taking place in force already. Importantly the new code helps our people do the **right thing, in the right way, for the right reason** and promotes openness, accountability, learning & improvement. It underpins our Equality, Diversity & Inclusion Strategy currently being refreshed, in that the CoE promotes a respectful and supportive culture in which everyone can thrive. It is our opportunity to engage our people to think about ethical decision making, actions and behaviours but also to further enhance the service we provide the public. For example, the link between

Organisational Justice and Procedural Justice and how ethical decision making can enhance encounters such as stop search, use of force and services to victims and suspects alike. There is also strong evidence to suggest that there are clear links between wellbeing of staff and the making of good ethical decisions so linking this work to our wellbeing work will also have potential benefits for the CoLP.

11. The key here in considering our delivery plan is how we connect the new CoE to all our staff so that ethics become an integral part of their thinking, actions, and behaviours daily. It simply cannot be a document which is launched and only referred to for promotion processes or in our staff's view a misconduct document.
12. The College of Policing are producing a range of material to assist forces in communicating and engaging staff and the public and partners. Internal communications will be using this material to ensure the new CoE is bought to life in CoLP but tailored to our local environment to compliment the work already going on and to link to our own force values (Appendix 5). The College of Policing view this as an 18-month programme of work to embed the new codes. The launch is also being supported by an online learning program for all staff to complete.
13. Appendix 4 details a high-level draft internal plan of work to embed the code both with all our Police Officers, Staff & Volunteers but also across the full range of our policies, processes, meeting structures & external scrutiny. There is now an internal CoE delivery group, chaired by T/Cdr Rob Atkin, which is overseeing the embedding of the new CoE in CoLP. Delivery of the plan will also be monitored on a quarterly basis at the CoLP Performance Management Group.
14. The launch on 24th January has been supported by a series of force communications and staff briefings to introduce the new codes, including a video from the T/Commissioner discussing the new CoE and the importance to individual officers and the force in helping our staff 'do the right thing'. The plan then required Directorate Heads over the coming weeks, having been briefed & equipped with materials leading conversations across their teams on the new CoE and having open conversation in respect of what they mean and practical application. The importance here will be how the CoE becomes part of daily conversations and considerations across the CoLP for example in debriefing and PDR conversations. This is supported by work that Professionalism and Trust are delivering in relation to 'ethical conversations' – an opportunity where staff can discuss ethical issues and their response.
15. During our launch, we have referenced our current force values and how they align to the new CoE for example empathy naturally aligns with compassion, integrity requires courage and professionalism has a direct link to public service. This will form part of the discussions across the CoLP with staff in providing practical examples of how the new codes can be demonstrated on and off duty.
16. The delivery plan will also see the new CoE being integrated into all our in-force training and importantly how the changes affect for example National Decision-Making model considerations. This will be a specific workstream to

map all our training, to refresh and review content to ensure the new CoE runs throughout. Likewise, our HR processes will be updated to reflect the new code whether that is recruitment, assessment, promotions framework or PDR. HR processes such as PDR reflections and promotion processes ensure our staff have a practical opportunity to demonstrate how they are using the CoE in their daily work.

17. Other key areas of policy and practice that will need to ensure the CoE is reflected in decision making is Professional Standards. Staff training and policy changes will need to embed the new codes to ensure that PSD have regard to', 'inform assessments', and be 'partly guided by' the CoE in misconduct assessments.
18. An external communications plan has also been created to compliment the national media that will be completed by the College of Policing on launch date. Going forward examples of CoE good practice offer an opportunity to inform both our internal and external good news content.
19. In many forces Ethics Boards are now a tried and tested method of testing organisational leadership, decision-making, policy, and practice. Owing to the varied nature of how ethics boards are run in forces, the NPCC portfolio has instigated work, led by ACC Osman Khan, to review national practice, research and academic findings to formalise some good practice guidance for forces to consider.
20. Recognising that cultural change and the improvements that we would want to see both internally and indeed externally on public encounters and service delivery will not be solely delivered by a new code of ethics. However, if the new code is viewed as the foundation of all that we do in force and intertwined with current and future change, policy, leadership & continual professional development the evidence suggests that we can achieve a significant positive shift in both internal feeling of fairness and belonging but also improvements in service provision and interactions with the public.
21. From 2025 HMICFRS inspections will examine how the CoE has been embedded in force and will form an integral part of the force inspection process.

Conclusion

22. The launch of a new CoE presents a significant opportunity for the CoLP to further enhance our workplace culture, leadership, and well-being for all staff. The new CoE compliments work already underway under our refreshed equality, diversity, and inclusion strategy. It presents an opportunity for staff conversations in respect of ethical decision making and a forward-looking set of principles and practical guidance to assist our staff in doing the right things. It is an opportunity to reaffirm the ethical behaviours that all staff are expected to consider as part of their daily duties. The importance of leadership across all areas of the force in embedding the new CoE and having ongoing conversations with staff will be essential in embedding behavioural and cultural change in the long term. Members will be updated in respect of our progress as we work to fully embed the CoE.

Rob Atkin
T/Commander Ops and Security
City of London Police

Appendices

Appendix 1 - Codes of Practice for ethical policing

[Code of Practice for Ethical Policing | College of Policing](#)

Appendix 2 – Ethical policing principles

[Ethical policing principles | College of Policing](#)

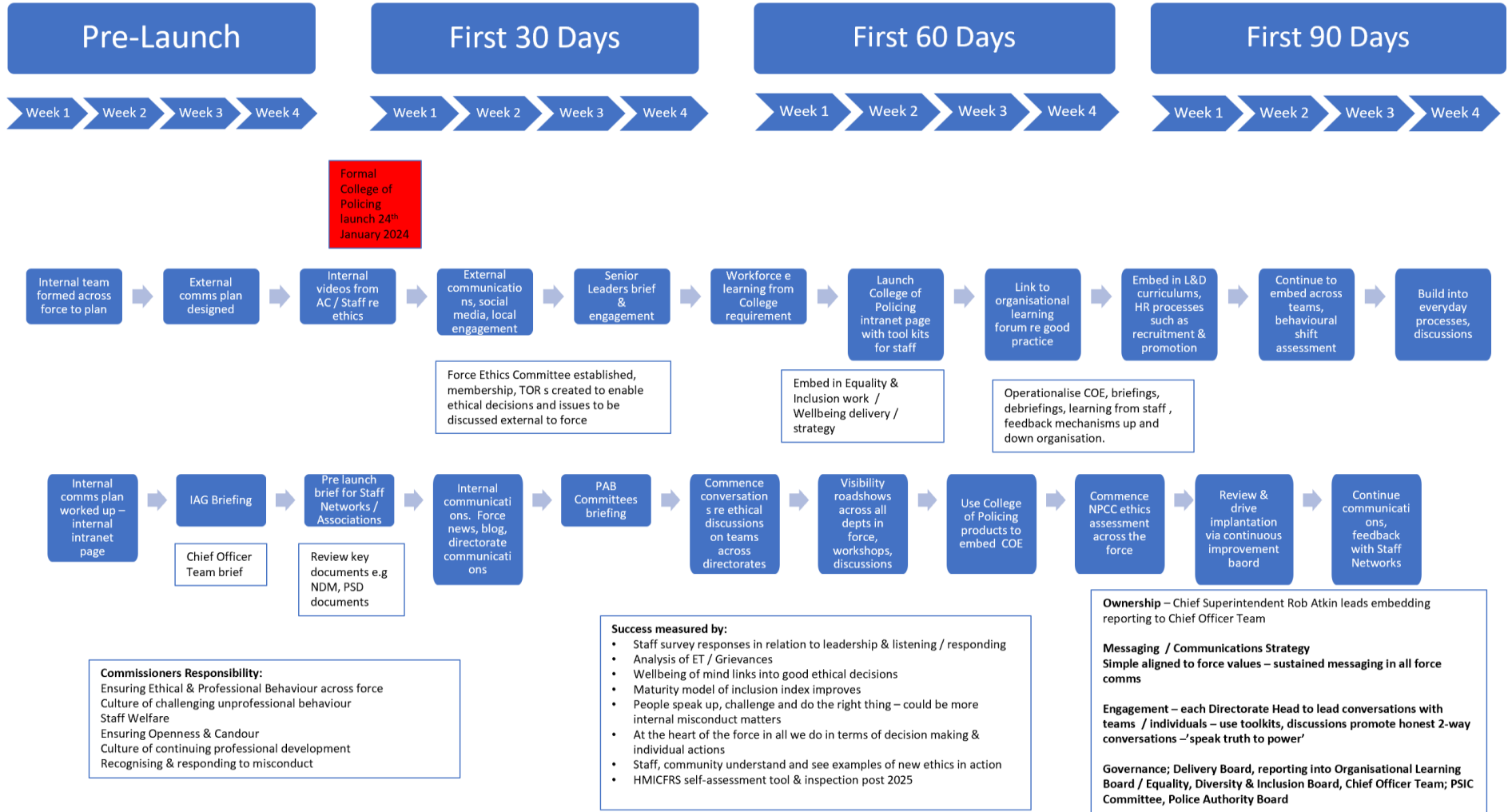
Appendix 3- Guidance on ethical and professional behaviour in policing

[Guidance for ethical and professional behaviour in policing | College of Policing](#)

Appendix 4 – Overview of delivery plan

Appendix 5 – example of internal posters x2

Appendix 4- Overview of Delivery Plan



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Ethical policing principles

We will use the ethical policing principles to help us make and reflect on our professional decisions. As policing professionals, we commit to the following.

Courage

Making, communicating and being accountable for decisions, and standing against anything that could bring our profession into disrepute.



Respect and empathy

Encouraging, listening to and understanding the views of others, and seeking to recognise and respond to the physical, mental and emotional challenges that we and other people may face.



Public service

Working in the public interest, fostering public trust and confidence, and taking pride in providing an excellent service to the public.



Doing the right things, in the right way, for the right reasons





Code of Ethics

The Code of Ethics sits at the heart of everything we do. It sets out how we work together in policing and with the public to keep people safe.

The Code of Ethics is inclusive and supports everyone in policing. It has two parts, both of which are non-statutory.

Ethical policing principles

These principles are a series of guiding statements that should be used to help people in policing do the right things, in the right way, for the right reasons.

Guidance for ethical and professional behaviour in policing

The guidance describes how policing professionals should behave. It provides practical advice on areas of policing that are important to maintaining public trust and legitimacy.

Code of Practice for Ethical Policing

The Code of Ethics is supported by a statutory Code of Practice for Ethical Policing. It includes actions that chief officers should take to support people in their force to use the ethical policing principles and to demonstrate professional behaviour.

Code of Ethics
Know your code



Courage



We show courage by:

- ◆ taking responsibility
- ◆ setting an example
- ◆ challenging unprofessional behaviour and practice
- ◆ being honest, open and accountable
- ◆ encouraging feedback and scrutiny

Code of Ethics



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Committee(s): Professional Standards and Integrity Committee (PSIC)	Dated: 27 February 2024
Subject: HMICFRS Inspections Update- Vetting, misconduct, and misogyny in the police and CoLP Counter Corruption and Vetting Inspection	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 35-24	For Information
Report author: Linda Healy, Professional Standards Dept	

Summary

The Chair of the Board requested an update on His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) Inspections relating to the national thematic Inspection on ‘vetting, misconduct, and misogyny in the police’ and the inspection on the Force Counter Corruption and Vetting Units.

City of London Police produced a combined delivery / action plan for these inspections in response to recommendations in the publication by HMICFRS ‘An inspection of vetting, misconduct, and misogyny in the police.’ Incorporated were recommendations from the HMICFRS inspection of City of London Police’s Counter Corruption Unit (CCU) and Vetting Unit published in June 2023.

City of London Police has delivered on all recommendations.

Recommendation(s)

Members are asked to note the report.

Main Report

Background

1. In November 2022, His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) published ‘An inspection of vetting, misconduct, and misogyny in the police’ report. This was a national thematic inspection and not specific to City of London Police (CoLP). The report made forty-three (43) recommendations and five (5) Areas for Improvement (AFI) which they acknowledged was an unusually high number of recommendations for a

HMICFRS report. Of the 43 recommendations 29 were for Chief Constables as well as the five AFIs.

2. In October 2022 HMICFRS carried out an inspection of City of London Police Counter Corruption Unit (CCU) and Vetting Unit. The inspection covered similar areas to the national report. At the conclusion of the inspection the HMICFRS team delivered a 'hot' debrief. The aim of which was to give an overview but not a definitive judgement on CoLP's performance to allow CoLP to consider any early action that might be necessary instead of waiting for the publication of the inspection report.
3. From this de-brief CoLP adopted nine recommendations to take action on immediately. This was reduced to six when the national thematic report was published as three actions adopted from the debrief formed part of the twenty-nine national recommendations for Chief Constables.
4. In June 2023 HMICFRS published its report and CoLP was assessed as 'requires improvement'.

Current Position

5. The recommendations have been all been delivered on with no actions outstanding. They will now be incorporated into business-as-usual processes and monitored through local governance. Additionally, progress is scrutinised and monitored at a strategic level through the HMICFRS Operational Improvement Board chaired by the Assistant Commissioner.

Delivery of the Action Plan

6. A combined delivery / action plan was produced from the national thematic report and CoLP Counter Corruption Unit (CCU) / Vetting inspection report. This has a total of forty separate actions made up of:
 - 5 Areas for Improvement
 - 29 Actions for Chief Constables
 - 1 action identified from CoLP specific inspection report.

HMICFRS Delivery Plan	RAG Rating		
	RED	AMBER	GREEN
National Thematic Report - Recommendations for Chief Constables			29
National Thematic Report -Areas for Improvement		1*	4
CoLP Specific Inspection Report			1
Grand Total		0	34

*AFI 3 – Cultural Audit – in progress

Support to Professional Standards Dept Senior Leadership Team (PSD SLT)

7. Due to the high number of recommendations a member of staff was seconded to Professional and Trust to work with the Counter Corruption Unit (CCU) and Vetting to co-ordinate delivery and implementation of the HMIC action plan. This is to work with the recommendation owners and track progress. To prepare reports for governance groups both within CoLP and national requests from HMIC / NPCC for progress against recommendations. This secondment ended at the end of January 2024.

HMICFRS Rolling Programme

8. HMICFRS graded the recommendations nationally as requiring a Level 3 sign off for completion which would normally require an inspection. It was recognised this process could take a number of years nationally with the current inspection rolling programme. It was agreed with the HMIC portfolio director to consider remote, or paper evidence review where possible.
9. Police forces were invited to submit supplementary evidence for recommendations specified by HMICFRS to demonstrate achievement. The submission of supplementary evidence was voluntary. CoLP submitted evidence for the initial six recommendations selected by HMICFRS which they subsequently verified as satisfactorily completed. This enabled CoLP to submit a closure on the HMICFRS inspection portal with an accompanying verification letter from the Chief Officer Team.
10. The rolling programme verification process by HMICFRS has now moved onto the next six nominated recommendations to be completed through submission of supplementary evidence to demonstrate the recommendation has been met. CoLP has submitted supplementary evidence which is being accessed by HMICFRS.

Governance

11. The strategic governance is through the HMICFRS Operational Improvement Board chaired by the Operations and Security Assistant Commissioner which encompasses all HMICFRS recommendations from operational business areas.
12. An update on these will also be brought to the Professional Standards and Integrity Committee for detailed oversight.
13. There was monthly reporting to NPCC, who were co-ordinating the response on behalf of HMICFRS, to track national progress against the recommendations. This requirement has now ceased as final delivery dates have passed.
14. The Home Secretary was provided with a full update by HMICFRS.

Conclusion

15. City of London Police recognise the importance of delivering on the recommendations from these HMICFRS inspections and has through the plans and governance put in place delivered on all the recommendations due for delivery by 31 December 2023. CoLP is confident the recommendations will become business as usual processes.

Contact:

Linda Healy

Linda HEALY,

Professionalism and Trust

E: linda.healy@cityoflondon.police.uk

Committee(s): Professional Standards and Integrity Committee	Dated: 27 February 2024
Subject: Q3 Action Fraud Complaints and dissatisfaction	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 33-24	For Information
Report author: D/Supt Carly Humphreys, PSD; PC Ann Roberts, PSD	

Summary

At your last Committee in November 2023, there was some discussion about whether this report should be submitted to the Economic and Cyber Crime Committee or remain a report to be tabled at this Committee.

Since then the Chair of PAB, via Charles Smart, PA Team, has confirmed that this report should remain an item at this Committee.

Action Fraud complaint data for Quarter 3 2023- 24 is attached for information. A summary is provided in the attached.

Appendix 1- is the IOPC Information Bulletin in relation to Action Fraud Complaints for Q3.

Recommendation(s)

Members are asked to note the report.

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Summary of Action Fraud public complaints data– Q3 2023/24				
Metric	Current quarter (Q3)	Previous quarter (Q2)	(%) change (Q on Q)	Comment
Complaints – Schedule 3	1	1	0%	A total of 83 cases were logged in Q3 2023/24. This is an overall decrease of 27 cases from Q2 2023/24 (25%) The average number of cases logged over the previous 5 quarters is 111 per quarter, Q3 is below average. It has been identified not all complaints logged in the AF SUGAR system have been logged into the PSD (centurion database). This is being rectified ¹ .
Complaints – not Schedule 3	82	109	25%	
Allegations	48	42	14%	There were 48 allegations recorded in Q3 2023/24. This is an increase of 6 allegations from Q2 2023/24 (14%). The average number of allegations over the previous 5 quarters is 83 per quarter. Q3 is below average.
Average time to log complaints (days)	N/A	2		<i>Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.</i>
Average time to contact complainant (days)	N/A	16		
Complaints finalised – Schedule 3	5	5	0%	
Complaints finalised - not Schedule 3	48	43	12%	
Average time to finalise complaint cases (days) – Schedule 3	Case combined data average 105 days	87	n/a	<i>Timeliness is taken from IOPC published bulletins and available retrospectively.</i> <i>Case combined data average 105 days (ex subjudice). IOPC bulletin will publish breakdown by case type logged.</i>
Average time to finalise complaint cases (days) – not Schedule 3		54	n/a	
Applications for review sent to local policing body	0	0		None recorded during Q3
Applications for review sent to IOPC	0	0		None recorded during Q3

¹ All dissatisfaction data should be logged on Centurion (PSD) to reflect true public complaint data relating to Action Fraud. This is essentially a manual process from Sugar (the customer facing Action Fraud website) and inputted to Centurion. There are issues with Sugar, as the website allows complaints to be made, the identification of what might be defined as a complaint (as some of these are not complaints), and then referring identified complaints to PSD. In order to rectify this issue. 1. We are manually capturing and transferring AF Sugar complaints to PSD and 2. There is PSD engagement with the facilitation of the new AF/NFIB systems (however, there are no plans to automate the 'complaints' into Centurion at this time).

Nature of allegations – Of the 48 allegations recorded during Q3 2023/24 the highest number was in the category of, A1 – Police action following contact (24) followed by A4 - General level of Service (13) and A3 – Information (9). Reasons for complaint mostly relate to customer expectation of Action Fraud, with either the lack of contact or investigation cited. This is an increase in allegations recorded against Q2 of 6 (14%).

Members of Parliament -

There have been 20 miscellaneous cases logged where MPs have made contact with PSD on behalf of a constituent. This is lower than the previous quarter.

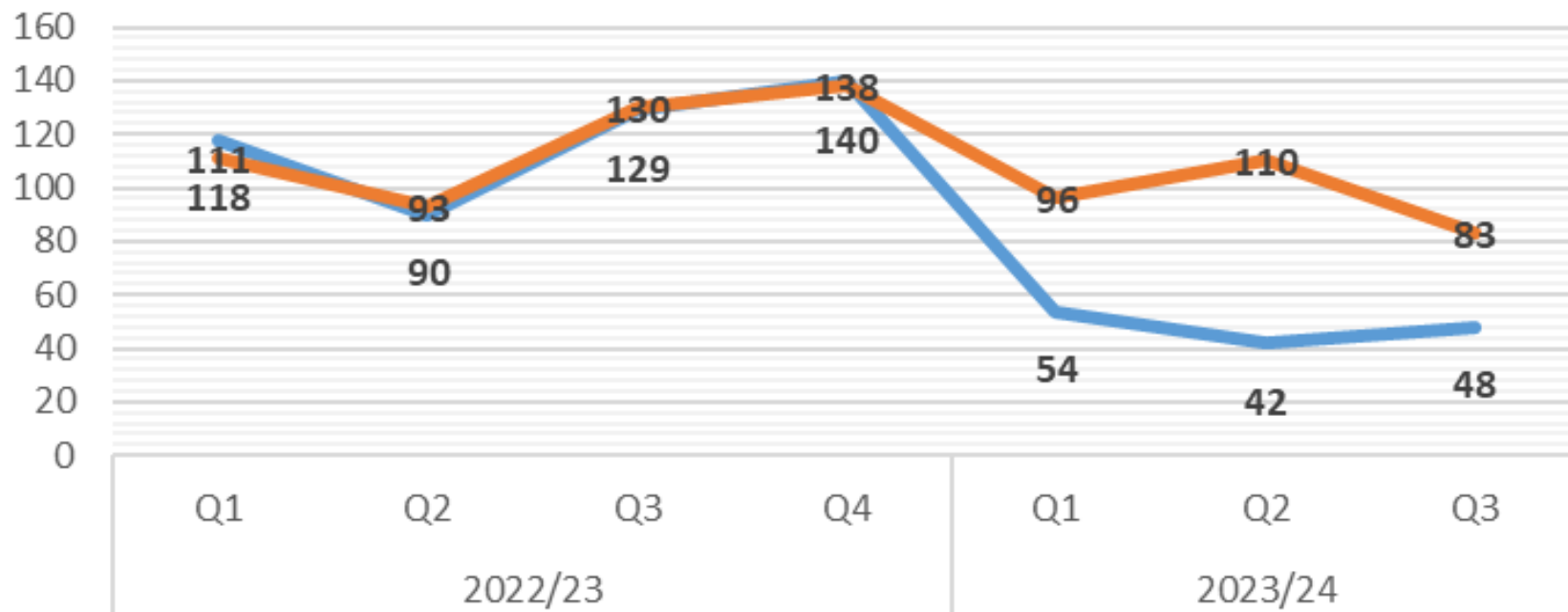
Action Fraud -

In Q3 of the 2023/24 Financial Year Action Fraud recorded **141,024** reports on the National Fraud Database (**93,347** crime reports and **47,677** Information reports).

The complaint figures (total) represent 0.06% of the total number of Action Fraud reports recorded in Q3.

Action Fraud complaint data

— Total Action Fraud Allegations recorded
— Total Action Fraud Complaints logged



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Police Complaints Information Bulletin: Action Fraud

Reporting Period: 01 April 2023 - 31 December 2023 (Q3 2023/24)

About this bulletin

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

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

As the IOPC does not record Action Fraud as an appropriate authority, details of IOPC referrals and reviews are not included in this bulletin

Contents

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

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Page 7 Section C1 Reviews received, Section C2 Reviews timeliness, Section C3 Decisions on LPB reviews

Page 8 Section D1.1: Complaint cases timeliness outside of Schedule 3

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Acronyms used in this bulletin

Force – Year to date force numbers, **SPLY** - Same period last year, **MSF** - Most similar force, **LPB** - Local policing body, **PRA** - Police Reform Act 2002, **Inc.** – Including

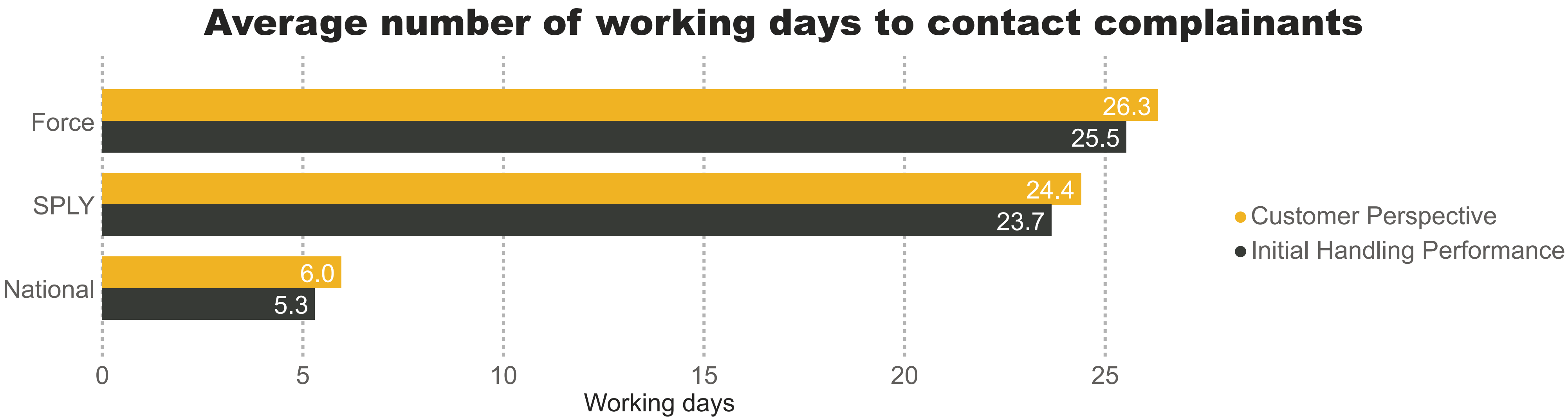
Ind – independent Investigation, **Nat.** – National, **No.** – Number, **RPRP** – Reflective Practice Review Process, **UPP** – Unsatisfactory Performance Procedure

Section A1.1: Complaint cases logged and initial handling

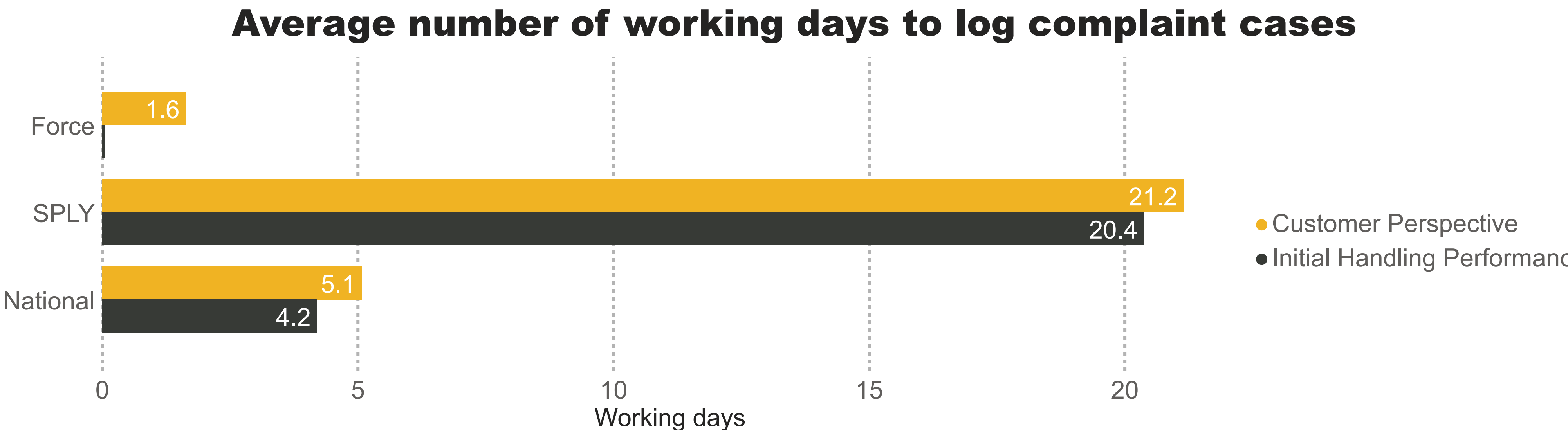
This section presents information relating to the force’s contact with customers and their initial handling of the complaint cases. It shows how long, on average, it takes from the customer’s perspective from when they made the complaint and the force’s performance of the initial handling from when it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

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

Average number of working days to contact complainants	Customer perspective	Initial handling performance
Force	26	26
SPLY	24	24
National	6	5



Average number of working days to log complaint cases	Customer perspective	Initial handling performance
Force	2	0
SPLY	21	20
National	5	4



Complaint cases logged

	Force	SPLY	National
Complaint cases logged	289	334	62,963
Complaint cases logged per 1,000 employees			249

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

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

Reason complaint case recorded under Schedule 3	Force		SPLY		National	
	No.	%	No.	%	No.	%
AA/body responsible for initial handling decides	4	40 %	10	24 %	10,304	43 %
Complainant wishes the complaint be recorded	0	0 %	2	5 %	5,003	21 %
Dissatisfaction after initial handling	6	60 %	30	71 %	3,400	14 %
Nature of the allegation(s) in the complaint	0	0 %	0	0 %	5,131	22 %

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

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

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

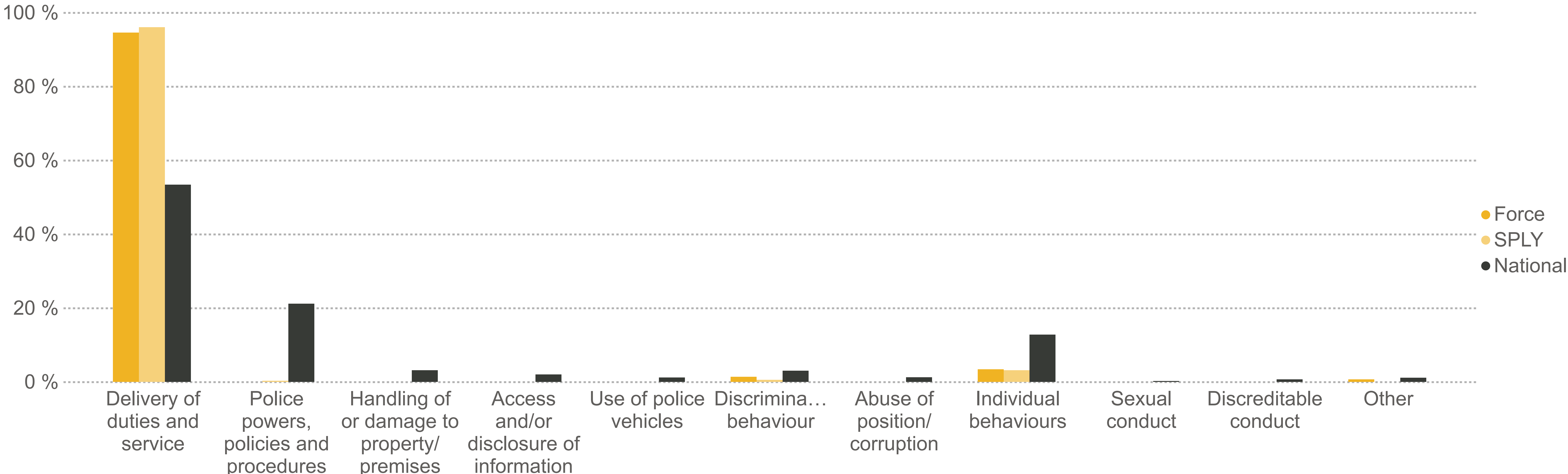
Allegations logged

	Force	SPLY	National
Allegations Logged	147	352	110,331
Allegations logged per 1,000 employees			436

What has been complained about

	Delivery of duties and service	Police powers, policies and procedures	Handling of or damage to property/premises	Access and/or disclosure of information	Use of police vehicles	Discriminatory behaviour	Abuse of position/corruption	Individual behaviours	Sexual conduct	Discreditable conduct	Other	Total
Force	139	0	0	0	0	2	0	5	0	0	1	147
SPLY	338	1	0	0	0	2	0	11	0	0	0	352
National	58,911	23,380	3,456	2,234	1,300	3,346	1,359	14,123	233	757	1,231	110,330
Force	95 %	0 %	0 %	0 %	0 %	1 %	0 %	3 %	0 %	0 %	1 %	100 %
SPLY	96 %	0 %	0 %	0 %	0 %	1 %	0 %	3 %	0 %	0 %	0 %	100 %
National	53 %	21 %	3 %	2 %	1 %	3 %	1 %	13 %	0 %	1 %	1 %	100 %

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

Category	Subcategory	Force		SPLY		National		
		No.	%	No.	%	No.	%	
Delivery of duties and service	Total	139	95 %	338	96 %	58,907	53 %	
	Police action following contact	102	73 %	227	67 %	25,213	43 %	
	Decisions	4	3 %	32	9 %	7,833	13 %	
	General level of service	19	14 %	38	11 %	19,902	34 %	
Discriminatory behaviour	Information	14	10 %	41	12 %	5,959	10 %	
	Total	2	1 %	2	1 %	3,346	3 %	
	Decisions	0	0 %	0	0 %	0	0 %	
	Age	0	0 %	0	0 %	59	2 %	
	Disability	0	0 %	0	0 %	601	18 %	
	Gender reassignment	0	0 %	0	0 %	28	1 %	
	Marriage and civil partnership	0	0 %	0	0 %	3	0 %	
	Pregnancy and maternity	0	0 %	0	0 %	1	0 %	
	Race	2	100 %	2	100 %	1,689	50 %	
	Religion or belief	0	0 %	0	0 %	91	3 %	
	Sex	0	0 %	0	0 %	479	14 %	
	Sexual orientation	0	0 %	0	0 %	119	4 %	
	Other	0	0 %	0	0 %	276	8 %	
	Individual behaviours	Total	5	3 %	11	3 %	14,122	13 %
		Unprofessional attitude and disrespect	5	100 %	11	100 %	4,046	29 %
Lack of fairness and impartiality		0	0 %	0	0 %	1,894	13 %	
Overbearing or harassing behaviours		0	0 %	0	0 %	2,519	18 %	
Impolite language / tone		0	0 %	0	0 %	3,672	26 %	
Impolite and intolerant actions		0	0 %	0	0 %	1,991	14 %	

This section presents the most commonly recorded categories for allegations that have been logged. A complaint case will contain one or more allegations and one category (and sub-category, where available) is selected for each allegation logged. Total % is of the total number of allegations logged. Allegations where the subcategory is 'none' are omitted from this table.

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

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

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

Factors	Delivery of duties and service	Discriminatory behaviour	Individual behaviours	Total
Fraud	139	2	5	146

Section A2: Allegations timeliness

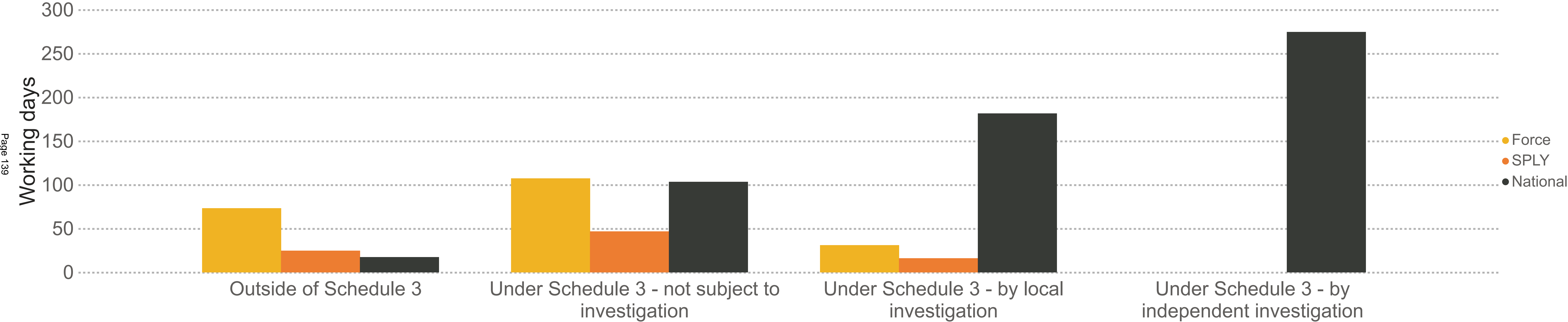
Average number of working days to finalise allegations	Force	SPLY	National
Outside of Schedule 3	73	25	18
Under Schedule 3 - not subject to investigation	107	47	103
Under Schedule 3 - by local investigation	31	16	182
Under Schedule 3 - by directed investigation	0	0	0
Under Schedule 3 - by independent investigation	0	0	275

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

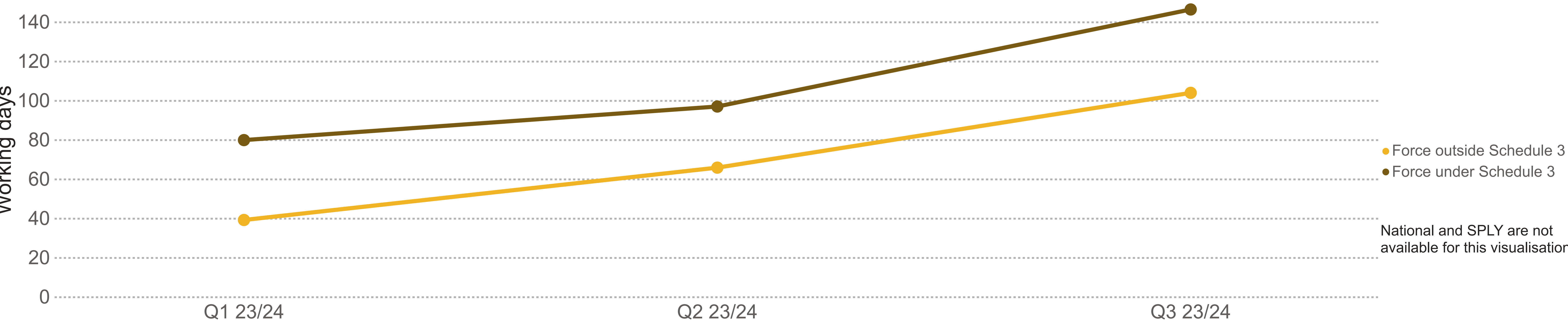
Independent investigation figures do not include conduct or death/serious injury investigations which are also investigated by the IOPC.

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

Average number of working days to finalise allegations



Average number of working days to finalise allegations



National and SPLY are not available for this visualisation.

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

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

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

Please refer to our [Guidance on capturing data about police complaints](#) for details of allegation decisions.

How allegations were handled	Force No.	Force %	National No.	National %
Under Schedule 3 investigated (not subject to special procedures)	1	1 %	12,221	12 %
Under Schedule 3 investigated (subject to special procedures)	0		1,393	1 %
Under Schedule 3 - not investigated	23	15 %	45,603	44 %
Outside of Schedule 3	129	84 %	44,072	43 %
Total	153	100 %	103,289	100 %

How allegations were handled	Outside of Schedule 3				Under Schedule 3 - not investigated				Under Schedule 3 investigated (subject to special procedures)				Under Schedule 3 investigated (not subject to special procedures)			
	Force %	Force No.	Nat. %	Nat. No.	Force %	Force No.	Nat. %	Nat. No.	Force %	Force No.	Nat. %	Nat. No.	Force %	Force No.	Nat. %	Nat. No.
No further action					13 %	3	9 %	3,928			0 %	5			4 %	489
Regulation 41 applies							0 %	112			0 %	5			1 %	79
Service provided - unable to determine							8 %	3,573			2 %	30			8 %	1,018
Service provided - not acceptable							13 %	5,989			5 %	69			12 %	1,423
Service provided - acceptable					87 %	20	67 %	30,569			26 %	358	100 %	1	72 %	8,812
Not Resolved	5 %	6	7 %	3,153												
Resolved	95 %	123	93 %	40,919												
No Case to Answer											39 %	549				
Case to Answer											25 %	352				
Withdrawal							3 %	1,432			2 %	25			3 %	400
Total	84 %	129	43 %	44,072	15 %	23	44 %	45,603			1 %	1,393	1 %	1	12 %	12,221

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

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

Allegation category												
Allegation decisions	Delivery of duties and service	Police powers, policies and procedures	Handling of or damage to property/premises	Access and/or disclosure of information	Use of police vehicles	Discriminatory behaviour	Abuse of position/corruption	Individual behaviours	Sexual conduct	Discreditable conduct	Other	Total
No further action	3	0	0	0	0	0	0	0	0	0	0	3
Regulation 41 applies	0	0	0	0	0	0	0	0	0	0	0	0
Service provided - unable to determine	0	0	0	0	0	0	0	0	0	0	0	0
Service provided - not acceptable	0	0	0	0	0	0	0	0	0	0	0	0
Service provided - acceptable	21	0	0	0	0	0	0	0	0	0	0	21
Not Resolved	3	0	0	0	0	0	0	2	0	0	1	6
Resolved	121	0	0	0	0	0	0	2	0	0	0	123
No Case to Answer	0	0	0	0	0	0	0	0	0	0	0	0
Case to Answer	0	0	0	0	0	0	0	0	0	0	0	0
Withdrawal	0	0	0	0	0	0	0	0	0	0	0	0

Section C1 and C2: Reviews received, completed and timeliness

	Complaint cases finalised under Schedule 3	Reviews received	Reviews received as proportion of complaint cases finalised under Schedule 3	Number LPB reviews received - investigation	Number LPB reviews received - non-investigation	LPB Reviews completed	Average duration of LPB reviews
Force	14	0	0 %	0	0	0	0
SPLY	50	2	4 %	0	2	1	2
National	22,597	4,729	21 %	340	2,857	3,195	51

Where a complaint has been recorded under Schedule 3 to the *Police Reform Act 2002*, the complainant has a right to apply for a review. A person can apply for review if they are unhappy with the way their complaint was handled, or with the outcome. This applies whether the complaint has been investigated by the appropriate authority or handled otherwise than by investigation (non-investigation). The application for a review will be considered either by the local policing body or the IOPC; the relevant review body depends on the circumstances of the complaint. The IOPC handles reviews relating to Action Fraud as City of London, therefore there are no IOPC figures in this bulletin.

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

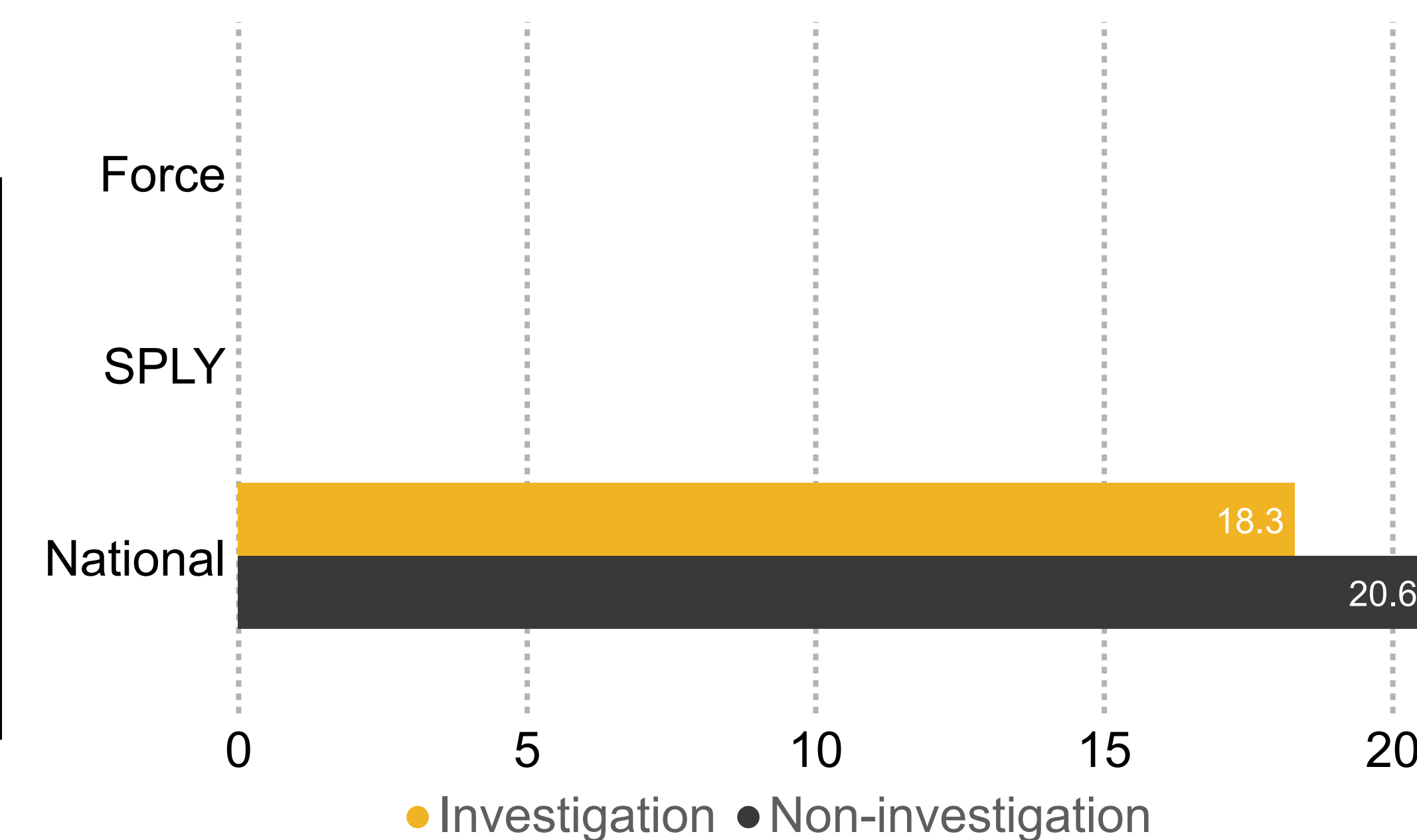
Reviews with 'invalid dates' have been removed from reviews timeliness. Please refer to the performance framework counting rules and calculations on the IOPC website for an explanation of invalid dates.

Section C3: Decisions on LPB reviews

This section presents information about the decisions made on reviews including the proportion of reviews that found the outcome of the complaint was not reasonable and proportionate, those which resulted in a recommendation and, if necessary, a direction to the appropriate authority in respect of any person serving with the police

LPB reviews found not reasonable and proportionate

	Valid completed reviews	Investigation		Non-investigation		
		Found not reasonable and proportionate	% found not reasonable and proportionate	Valid completed reviews	Found not reasonable and proportionate	% found not reasonable and proportionate
Force	0		0	0		0
SPLY	0		0	1		0
National	273	50	18	2,754	568	21



LPB reviews resulting in recommendations

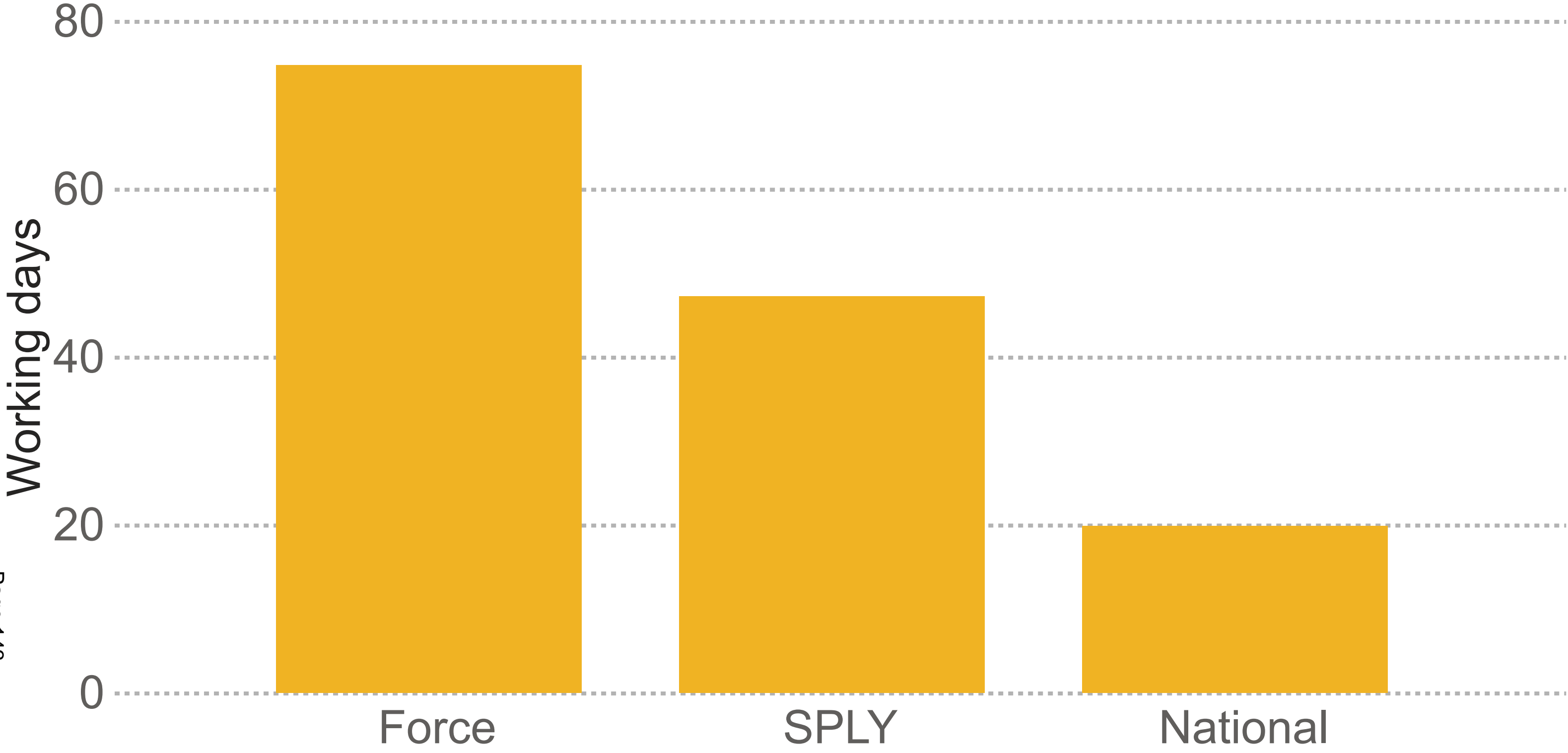
	Found not reasonable and proportionate	Investigation		Non-investigation		
		Resulting in recommendations	% resulting in recommendations	Found not reasonable and proportionate	Resulting in recommendations	% resulting in recommendations
Force			0			0
SPLY			0			0
National	50	50	100	568	487	86

Section D1.1: Complaint cases finalised outside of Schedule 3 - timeliness

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

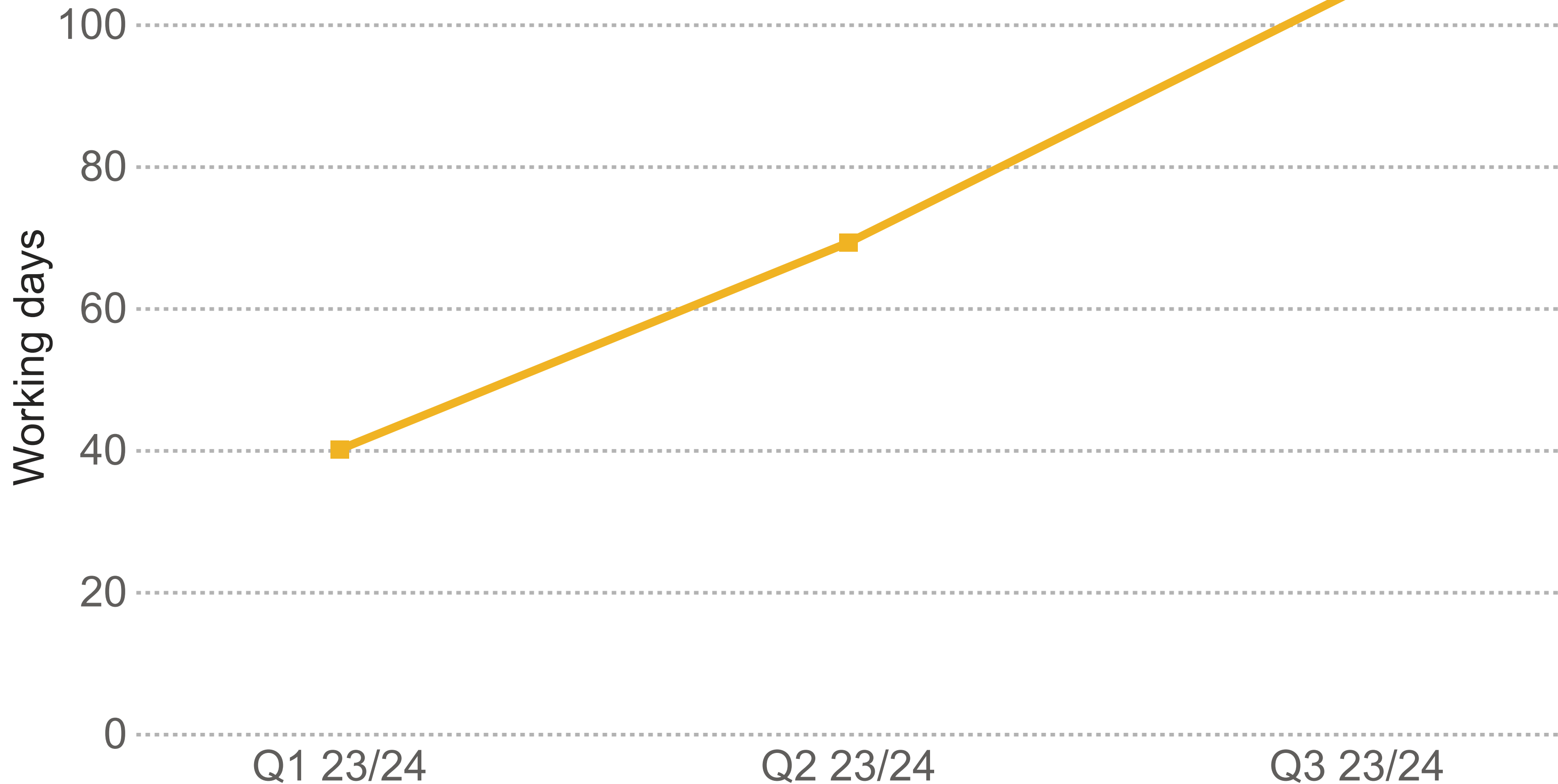
Complaint cases with 'invalid dates' have been removed from the data shown. Please refer to the [IOPC website](#) performance framework counting rules and calculations on the for an explanation of invalid lates.

Average number of working days to finalise complaint cases



	Force	SPLY	National
	75	47	20

Average number of working days to finalise complaint cases by quarter



National and SPLY are not available for this visualisation.

Section D1.2: Complaint cases finalised under Schedule 3 - timeliness

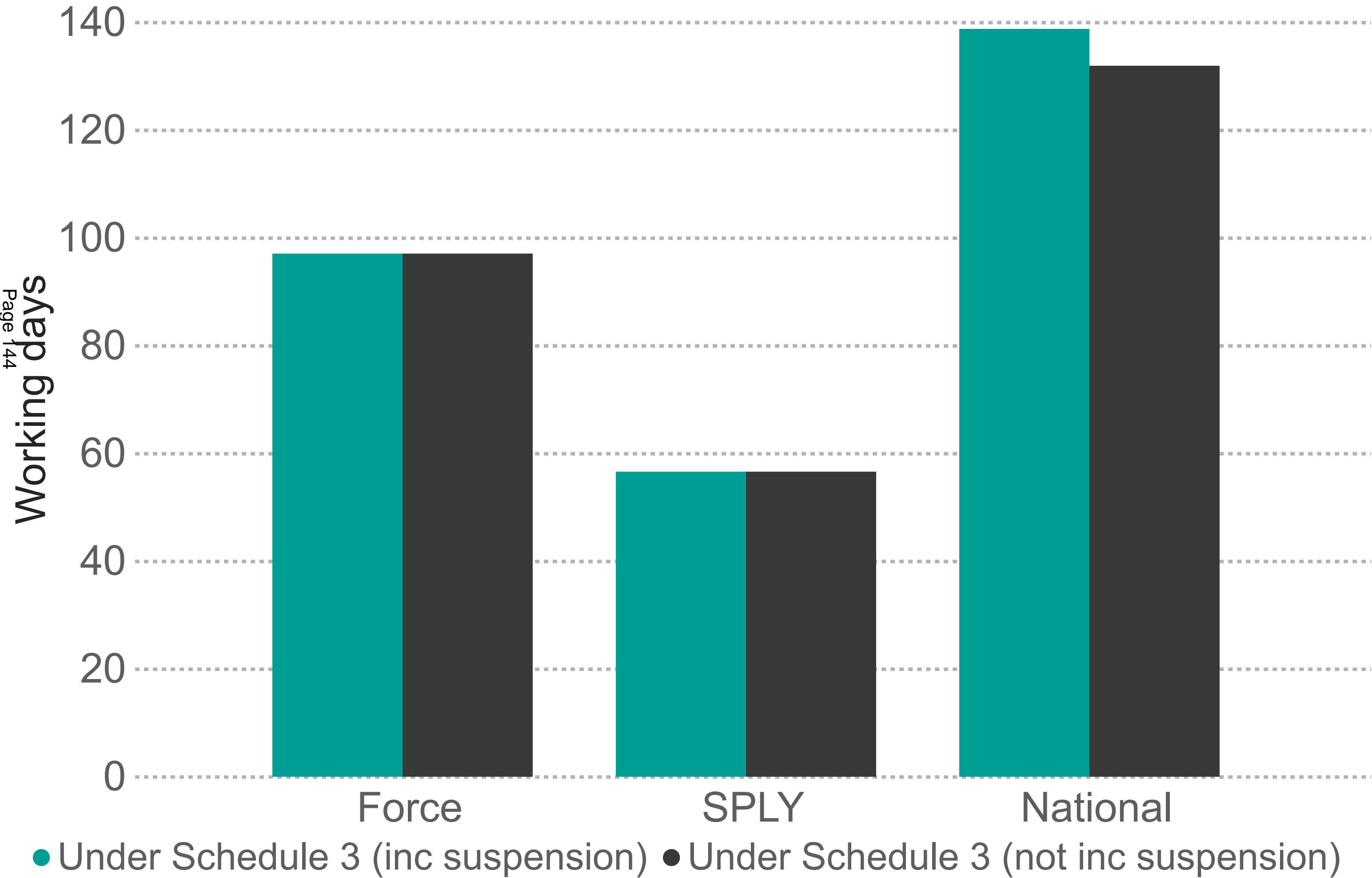
Average number of working days to finalise complaint cases

	Force	SPLY	National
Under Schedule 3 (inc suspension)	97	57	139
Under Schedule 3 (not inc suspension)	97	57	132

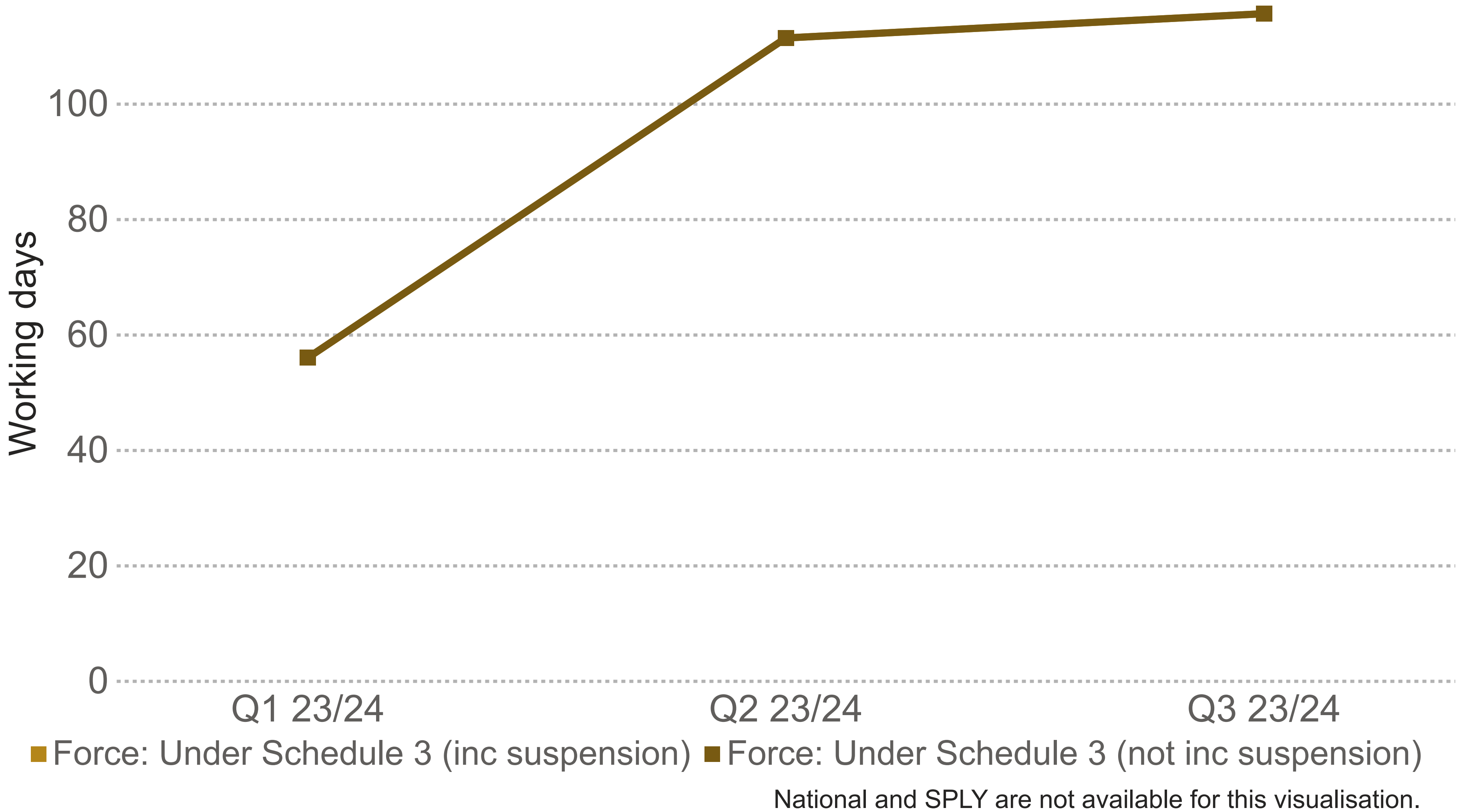
This section shows the time it takes the force to finalise complaint cases from the customer's perspective. It gives a breakdown of the time taken to finalise complaint cases handled formally under Schedule 3. Timeliness is calculated from the date the complaint was made.

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

Average number of working days to finalise complaint cases



Average number of working days to finalise complaint cases by quarter



Section D2.1: Allegation actions - on complaint cases handled outside of Schedule 3

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

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

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

Actions following outside of Schedule 3 complaint cases	Force		SPLY		National	
	No.	%	No.	%	No.	%
Organisational learning	0	0 %	0	0 %	119	0 %
Learning from reflection	0	0 %	0	0 %	923	2 %
Policy review	0	0 %	0	0 %	25	0 %
Goodwill gesture	0	0 %	0	0 %	80	0 %
Apology	25	21 %	2	1 %	3528	9 %
Debrief	0	0 %	0	0 %	321	1 %
Explanation	91	75 %	258	99 %	21805	59 %
No further action	5	4 %	0	0 %	5409	15 %
Other action	0	0 %	1	0 %	3816	10 %

Section D2.2: Allegation actions - on complaint cases handled under Schedule 3

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

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

All complaint cases handled under Schedule 3

Complaint cases resulting in below actions	Force		SPLY		National	
	No.	%	No.	%	No.	%
Organisational learning	0	0 %	0	0 %	497	2 %
Apology	0	0 %	0	0 %	1266	6 %
Debrief	0	0 %	0	0 %	261	1 %
Explanation	13	93 %	50	100 %	12746	56 %
Criminal proceedings	0	0 %	0	0 %	2	0 %
Unsatisfactory Performance Procedure (UPP)	0	0 %	0	0 %	17	0 %
No further action	1	7 %	0	0 %	7035	31 %
Other action	0	0 %	0	0 %	532	2 %
Learning from reflection	0	0 %	0	0 %	2448	11 %
Referral to RPRP	0	0 %	0	0 %	674	3 %

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

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

Complaint cases resulting in below actions	Force		SPLY		National	
	No.	%	No.	%	No.	%
Misconduct proceedings	0	0 %	0	0 %	99	25 %
Criminal proceedings	0	0 %	0	0 %	2	1 %
Unsatisfactory Performance Procedure (UPP)	0	0 %	0	0 %	4	1 %
Other actions following a case to answer decision	0	0 %	0	0 %	16	4 %
Referral to RPRP	0	0 %	0	0 %	114	29 %

Notes

Data sources

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

Performance Framework counting rules and calculation

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

Data constraints

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

Further Information

- A glossary providing a full list of definitions used in this bulletin, can be found on the [IOPC website](#).
- Additional information about the recording of police complaints, including the definitions of the complaint categories, can be found in appendix A of the IOPC's [Guidance on capturing data about police complaints](#).
- Information about how the police complaints system operates, who can complain and how reviews are dealt with can be found in the IOPC's [Statutory Guidance on the police complaints system \(February 2020\)](#).

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