



Professional Standards & Integrity (Police) Committee

Date: TUESDAY, 4 JUNE 2024
Time: 10.00 am
Venue: COMMITTEE ROOMS, GUILDHALL

Members: Michael Mitchell (Chair) Deputy Madush Gupta
Tijs Broeke (Deputy Chair) Deputy James Thomson
Nicholas Bensted-Smith Florence Keelson-Anfu
Jason Groves Naresh Hari Sonpar

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**

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

3. **MINUTES**

To agree the public minutes and non-public summary of the meeting held on 27 February 2024.

For Decision
(Pages 5 - 10)

4. **PUBLIC OUTSTANDING REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 11 - 12)

5. **ANGIOLINI INQUIRY- PART 1**

Report of the Commissioner.

For Information
(Pages 13 - 30)

6. **EQUITY, DIVERSITY, INCLUSIVITY (EDI) UPDATE**

Report of the Commissioner.

For Information
(Pages 31 - 64)

7. **CITY OF LONDON INDEPENDENT CUSTODY VISITING**

Report of the Town Clerk.

For Information
(Pages 65 - 86)

8. **Q4 STOP AND SEARCH AND USE OF FORCE 2023-24**

Report of the Commissioner.

For Information
(Pages 87 - 92)

9. **Q4 ACTION FRAUD COMPLAINTS AND DISSATISFACTION 2023-24**
Report of the Commissioner.
For Information
(Pages 93 - 98)
10. **ANNUAL COMPLAINTS REPORT 2022-23**
Report of the Town Clerk.
For Information
(Pages 99 - 120)
11. **Q4 PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE 2023-24**
Report of the Commissioner.
For Information
(Pages 121 - 136)
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 agree the non-public minutes of the meeting held on the 27 February 2024.
For Decision
(Pages 137 - 138)
16. **Q4 PSD COMPLAINTS CONDUCT AND VETTING REPORT - APPENDICES 3 AND 4**
Report of the Commissioner, to be read in conjunction with Item 9.
For Information
(Pages 139 - 158)

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

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

PROFESSIONAL STANDARDS & INTEGRITY (POLICE) COMMITTEE Tuesday, 27 February 2024

Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, Guildhall on Tuesday, 27 February 2024 at 1.45 pm

Present

Members:

Michael Mitchell (Chair)
Deputy James Thomson
Helen Fentimen
Joanna Abeyie
Naresh Sonpar

City of London Police:

Paul Betts	- Assistant Commissioner, City of London Police
Kate MacLeod	- City of London Police
Amanda Lowe	- City of London Police
Hayley Williams	- City of London Police
Ian Younger	- City of London Police
Linda Healy	- City of London Police
Jesse Wynne	- City of London Police
Kevin Summers	- City of London Police
Rob Atkin	- City of London Police

Officers

Richard Riley CBE	- Town Clerk's Department
Rachael Waldron	- Town Clerk's Department
Kezia Barrass	- Town Clerk's Department

1. **APOLOGIES**

Apologies were received from Nicholas Bensted-Smith, Tijs Broeke, Emma Edhem, Jason Groves, Florence Keelson-Anfu and Deborah Oliver.

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

There were no declarations.

3. **MINUTES**

RESOLVED – that the public minutes of the Professional Standards and Integrity Committee on 7 November 2023 were agreed as an accurate record.

4. **PUBLIC OUTSTANDING REFERENCES**

Members received a report of the Commissioner, which outlined the public outstanding references.

RESOVLED – that the report be noted.

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

Members received a report of the Commissioner which provided an update on the Equity, Diversity and Inclusion (EDI) work of the City of London Police.

During the discussion the following points were noted:

- The report had been amended to include the evaluation work of the inclusivity programme.
- A pilot cultural audit would start in March 2024, designed to uncover hidden behaviours within the Force.
- Members were pleased to see the attendance records for inclusivity programme courses and queried how this will be evidenced in practical/ frontline policing. It was suggested that some places on these courses could be advertised and opened to Members of the Police Authority Board. Officers were keen to support this as an exercise in engagement with Members.
- The Chair highlighted the necessity to assess both hard and softer measures of impact and offered to provide support to shape these impact measures.
- It was noted that there were currently resourcing limitations in the City of London Police in terms of the co-ordination of EDI work. Members stressed the importance which the Police Authority places on this work.
- Members asked how confident the force was that the operational requirements derived from the protests relating to the Middle East conflict were not impacting the ability to deliver the core policing service. Officers provided assurance that this work was given due consideration, and the impact and risks were appropriately considered.
- There was an ongoing review of the existing EDI strategy, and a framework was being developed to allow an agile responsive approach to delivering it.

RESOLVED – that the report be noted.

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

Members received a report of the Commissioner which outlined the draft equity, diversity, and inclusion strategy for the City of London Police for 2024-2027.

During the discussion the following points were noted:

- The Chair outlined that this draft document was shared for input and support and was keen to ensure that Members who were not present were afforded the opportunity to contribute and provide comments.
- It was agreed that this strategy would be a very important document for the Force. The priority was to get it right, and to ensure it was easily understandable, with a small number of clear actions which are deliverable and measurable.

- There was a suggestion that the title of the section 1" EDI Problem" was too negative. It was explained that the intention behind this language was to ensure accountability and self-awareness as an organisation.
- Members felt that it would be useful to outline why this issue would be important specifically for the City of London Police.
- The audience for the strategy should be more explicit and considered throughout the document.

RESOLVED, - that the report be noted.

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

Members received a report of the Commissioner which outlined the quarterly stop and search and use of force statistics for Q3.

During the discussion the following points were noted:

- The Chair thanked Officers for the report and queried the correlation between actuality in the statistics and public perceptions. The upcoming project with University of East London would help to provide some insight into this.
- Members welcomed the decrease in the disproportionality in the use of force and stop and searches against black and Asian individuals and queried how to use the learning from this to train officers on a wider level.
- It was suggested that the data from large scale events such as the protests in the City relating to the conflict in the Middle East would be stripped from the larger data picture, as these events can skew the whole picture.
- The total number of stop and searches within the last quarter in the City of London was 613. Officers felt that the way in which stop and searches were conducted, and the outcomes from them, was of greater importance than how many occurred.
- Members requested more information on outcomes in the next update and going forward.

RESOLVED – that the report be noted.

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

Members received a report of the Commissioner which outlined the professional standards, conduct and vetting update for Q3.

During the discussion the following points were noted:

- Members were concerned with the apparent increase in the number of gross misconduct cases reported during the quarter. Officers reflected on the complexity and seriousness of these cases and assured Members that this work was included in the ongoing building of trust and confidence in the City of London Police, showing that employees and members of the public felt more confident to come forward and report such incidences.
- There was a nation-wide lack of availability of legally qualified chairs to hold gross misconduct hearings, which was causing delays in progressing cases.
- The Chair, while concerned about the number of serious cases, was pleased that this evidenced the confidence victims felt in reporting these incidents.

RESOLVED – that the report be noted.

9. **COLLEGE OF POLICING'S CODE OF PRACTICE FOR ETHICAL POLICING - 'THE CODE OF ETHICS' IMPLEMENTATION AT CITY OF LONDON POLICE**
Members received a report of the Commissioner which outlined the implementation plan for the College of Policing's Code of Practice for Ethical Policing within the City of London Police.
During the discussion the following points were noted:
- Members welcomed the report and the new standards and questioned how these were reflected in the Equity, Diversity, and Inclusion Strategy.
 - Officers assured Members that there was enthusiasm within the Force for the new Code of Practice and conversations were ongoing as to how to embed these into practice.
 - It was noted it would take approximately 18 months minimum to embed.
- RESOLVED** – that the report be noted.
10. **HMICFRS INSPECTIONS UPDATE- VETTING, MISCONDUCT, AND MISOGYNY IN THE POLICE AND COLP COUNTER CORRUPTION AND VETTING INSPECTION**
Members received a report of the Commissioner outlining the HMICFRS inspections update.
During the discussion the following points were noted:
- The project includes a rolling programme of inspections, in which forces were invited to take part in submitting supplementary evidence and in which the CoLP had taken part.
- RESOLVED** – that the report be noted.
11. **ACTION FRAUD COMPLAINTS Q3**
Members received a report of the Commissioner which outlined Action Fraud complaints from Q3.
RESOLVED – that the report be noted.
12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions.
13. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
There was no other business.
14. **EXCLUSION OF THE PUBLIC**
RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.
15. **NON-PUBLIC MINUTES**
RESOLVED – that the non-public summary of the Professional Standards and Integrity Committee on 7 November 2023 were approved as an accurate record.
16. **CITY OF LONDON POLICE HISTORICAL DATA WASH**
Members received a report of the Commissioner which outlined the City of London Police historical data wash.
17. **MISCONDUCT CASES- DIP SAMPLES**

Members received a report of the Commissioner which provided a sample of ongoing misconduct cases within the City of London Police.

RESOLVED – that the report be noted.

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

Members received a non-public appendix to be read in conjunction with item 8.

RESOLVED – that the report be noted.

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

There were no questions.

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

There was no other business.

The meeting ended at 15:44

Chairman

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PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

PUBLIC OUTSTANDING REFERENCES

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, an update on this is in the EDI report on the agenda.
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	In Progress- Further work was requested by Members. It is planned for the final strategy to be presented to the July PAB. .

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Agenda Item 5

Committee(s): Professional Standards and Integrity Committee Police Authority Board	Dated: 4 June 2024 5 June 2024
Subject: Angiolini Inquiry- Part 1	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
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 69-24	For Information
Report author: D/Supt Carly Humphreys, Professional Standards, P&T	

Summary

On the 22nd November 2021, following the sentencing of Wayne Couzens the then Home Secretary addressed Couzens’ crimes and announced that she was launching an independent inquiry. The Angiolini Inquiry was commissioned as an independent, non-statutory inquiry. The Terms of Reference outlined the Inquiry’s investigative scope, which sought to establish a comprehensive account of the career and overall conduct of the killer of Sarah Everard, to identify any missed opportunities, and to make recommendations based on the findings.

On the 29th February 2024 Part One of The Angiolini inquiry was published¹, this addressed how Sarah’s killer was able to serve as a police officer for so long and seek to establish a definitive account of his conduct. The inquiry noted 16 recommendations, this report provides an initial response from the City of London Police to those recommendations, including the national position from the National Police Chiefs’ Council and the Government.

Part Two of the Inquiry will consider wider issues in policing in respect of policing and the protection of women. The Terms of Reference for this part of the inquiry have been agreed, however the publications for this and Part Three are unknown at this time. Following the sentencing of former police officer David Carrick in February 2023, Part Three of the Inquiry was established to examine Carrick’s career and conduct.

¹ [The Angiolini Inquiry – Part 1 Report \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

A review of these recommendations provides reassurance that the majority of those which are force-specific, are already either being delivered on or there is work underway to achieve the recommendation. Indeed, many of the recommendations relating to Vetting are welcomed as they support our own commitment in further professionalising the investigative approach within vetting and shared high standards in information exchange between forces and other agencies. We remain keen to understand a fuller position from the national recommendations and how we will need to support that at a force-level. In particular, the impact this will have on resourcing and finance to achieve what is agreed by national stakeholders.

Recommendation

It is recommended that Members note the report.

Main Report

I. Content and Findings (summary)

This report provides an overview on all of the 16 recommendations received from 'The Angiolini Inquiry Part One'. Please note that the recommendations are listed in a summary format for brevity but are outlined in full in [Annex A – The Angiolini Inquiry Part One, Recommendations in full](#).

A summary of the current position for the City of London Police, specifically regarding work already being delivered across each recommendation and where further work is required is outlined in this report.

Whilst it is accepted that the policing and public benefit of these recommendations must take precedence, some recommendations will present a resourcing and financial impact on the organisation, the ability to overcome these challenges is shared across forces and will be clearer as the national position develops. A number of recommendations, require joint work across the Home Office, Ministry of Justice, College of Policing and National Police Chiefs' Council, before they can be locally implemented.

II. National Position

The National Police Chiefs' Council have implemented governance arrangements to oversee policing's response to the 16 recommendations received from The Angiolini Inquiry, Part One. Monthly meetings will be held with national Chief Officer leads for thematic areas including: Violence Against Women and Girls, Equality, Diversity and Inclusion, Professional Standards & Ethics, Race Action Plan, Vetting, Chief Scientific Advisor for Policing, Culture and Communications.

This will be supported by a cross-sector group which brings together the NPCC, College of Policing (CoP) and Home Office to discuss as a whole the progress made against each recommendation.

We expect to receive updates from these groups in due course regarding the work being done against each recommendation, focusing in particular on the potential or existing barriers or challenges to delivery and providing direction to forces on how these can be addressed.

In March 2024, the Government accepted the recommendations made which place a requirement on the Home Office to work with the NPCC, CoP and other partners to understand the link between indecent exposure and an escalation in behaviour to ensure that the right measures are in place to catch more criminals earlier. The requirements of these national agencies are outlined alongside the force specific recommendations below.

III. City of London Police Progress on Recommendations

Recommendation 1: Approach to investigating indecent exposure

This recommendation requires all forces to ensure they have a specialist policy in place for investigating all sexual offences, including 'non-contact' offences, such as indecent exposure.

The City of London Police has this in place through oversight of all sexual offences being investigated within the Public Protection Unit (PPU), including 'non-contact' offences. This policy extends to ensuring the case is managed at the most specialist level with an officer trained in specialist sexual offences who also holds Professionalising Investigation Programme (PIP) level 2 accreditation.

Linked to operation Soteria, the transformation programme for Rape And Serious Sexual Offending (RASSO) within our CoLP Sexual Offences policy is subject of a review. This will align and support our work to implement the RASSO national operating model. Governance and delivery of this work is delivered by a cross-department project team led by the Specialist Operations Chief Superintendent with support from the CoLP Corporate Programme Office; recognising the need for a whole system approach to successful service delivery.

Recommendation 2: Guidance and training on indecent exposure

This is a recommendation for the College of Policing (CoP), in collaboration with the National Police Chief's Council (NPCC) to improve guidance and training on indecent exposure, in order to improve the quality of investigations and management of cases.

Although we await guidance from the CoP and NPCC on this matter. We have already assessed what training we currently provide and identified gaps in provision. Additionally, we are connected to regional and national groups linked to operational (Pursue, Prevent, Protect and Prepare) activity for sexual offending.

All student officers receive specific training on responding to sexual offences, including indecent exposure, this is part of First Responders Rape and Serious Sexual Offences Investigative Skills Development Programme (RISDP). The training programme is part of the CoP syllabus and also includes victim care. This course is currently being delivered across all operational areas of Specialist Operations, beginning with Public Protection, CID and Major Crime.

Recommendation 3: Treatment of masturbatory indecent exposure within the criminal justice system

The Home Office, Ministry of Justice, CoP and NPCC have been asked to conduct a fundamental review.

We await the results of this review and any resulting guidance.

Recommendation 4: Research into masturbatory indecent exposure

The Home Office in collaboration with CoP have been asked to commission research to establish if there is an evidence-based link between active masturbatory indecent exposure and subsequent contact offending.

We await the result of this and anticipate that any relevant findings will be used to shape national policy, training and guidance.

Recommendation 5: Public Information campaign on indecent exposure

By March 2025, the Home Office and NPCC should launch a public campaign to raise awareness and publicity surrounding the illegality, consequence of indecent exposure and to encourage reporting of unsolicited photographs sent of genitals with the intention to cause harm, distress or humiliation.

The CoLP Corporate Communications team are sighted on these recommendations and will support this public campaign through amplifying these messages across our organisation and communities.

Recommendation 6: Review of indecent exposure allegations and other sexual offences recorded against serving police officers.

By September 2024, the NPCC in collaboration with all force vetting units should review all allegations of indecent exposure and other sexual offences recorded on PND and PNC against serving officers.

A review has been completed and has concluded that there have been no allegations of indecent exposure linked to any CoLP officers, staff or volunteers following the Historical Data Wash results. We will be keen to work with the NPCC and other forces to establish an ongoing process to monitor PNC and PND submissions in real-time.

Recommendation 7: In person interviews and home visits

The CoP in collaboration with force recruitment should ensure that every new candidate applying to become an officer undergoes an in-person interview and home visit. This should be designed to provide a holistic picture of the candidate and a better understanding of the candidate's motivations for joining the police and their dedication to serving the public.

In person interviews have been in place for student officers since April 2023. These interviews are led by an officer of Sergeant or Inspector rank posted within Learning and Development, supported either by a member of the HR Team or another member of police staff within Learning and Development.

To perform home visits as one of the initial stages of the recruitment process, would prove a significant resourcing and potential budgetary challenge especially given the high attrition of student officers during the recruitment stage. Conversion is on a ratio of 1:10, so for every 10 applicants, only one will be successful. In CoLP, two student officer cohorts of 14 officers are run per financial year, necessitating 280 applicants to meet our student officer recruitment targets. Approximately 60% of this number do not pass the National Sift, Online Assessment Centre or interview stage, leaving 112 applicants for whom home visits would need to be carried out. The home visits would require dedicated resourcing, at this time it is unknown what the precise resource requirement would be. Due the demographic of our candidates and our location within the City, most of our candidates live outside of London meaning the time to travel to visit them would be greater than for other forces who recruit from closer residential areas.

Although we await national guidance on this process, to reduce some demand and financial pressure, one option would be to delay the home visit until further along in the vetting and onboarding process.

It is important conscious of the impact home visits may have on applicants from certain communities and groups which may deter them from applying, especially those from under-represented groups within which the force has struggled to recruit from previously. It will be important that this is managed and monitored carefully to minimise the impact on CoLP's ability to grow a diverse and inclusive workforce. It is also anticipated that some of these challenges will be discussed through the NPCC thematic areas of EDI, Police Race Action Plan, Culture and PSD during their oversight meetings.

National Guidance around the Integrity questionnaire and training for officers conducting the home visits would be essential to ensure this is standardised across all forces and what exactly the visits are designed to assess and against which framework.

Recommendation 8: Recruitment and vetting policy, processes and practices

By June 2024, the CoP in collaboration with force vetting units should take further steps to prevent those unsuitable for policing from joining the profession.

This recommendation particularly focuses on recruitment and vetting policy, processes and practice. Included in this recommendation is also a requirement for applicants to undergo an assessment of their psychological suitability of the role, including existing firearms officers. Our Occupational Health team is linked in with national leads and the CoP to ensure that any revisions to the medical recruitment guidance are evidence led. We also welcome further national guidance on the link between debt, mental health, vulnerability to corruption and suitability to be a police officer; to inform how we apply this within the new Vetting APP (Authorised Professional Practice).

We also welcome the updates to the new Vetting APP which supports our local decisions, already in place, to reject vetting applications of any individual with a conviction or caution for a sexual offence and to provide an information sharing agreement for vetting checks across armed forces.

Some aspects of this recommendation are already being delivered through existing HMICFRS recommendations, including the routine use of PND and PNC in all vetting applications. We also acknowledge the recommendation that no officer should be onboarded, even for initial training until all vetting has been completed.

Recommendation 9: Professional rigour in decision-making

By March 2025, the CoP in collaboration with force vetting units should take steps to improve the quality and consistency of police vetting decision-making.

We welcome this recommendation to enhance our own professional consistency but also to ensure that this standardised approach will ensure that there is an audit trail of effective decisions should an officer transfer forces.

Already, we have developed our vetting decision-making processes to ensure that they are structured and scrutinised. Our vetting officers will shortly receive bespoke interview training and be mentored by an experienced Counter Corruption Unit (CCU) officer to ensure that an investigative mindset is applied at all opportunities within the vetting process.

Recommendation 10: Vetting Code of Practice and transfers

With immediate effect, all recruiting forces should have regard to the new Vetting Code of Practice, which requires the parent force to provide all relevant information requested about the transferee to enable an effective assessment of risk by the force conducting a full re-vet of the transferee.

We are compliant with this recommendation and ensure that the new Vetting Code of Practice is followed to provide all relevant information requested about a transferee by the force conducting the vetting.

Recommendation 11: Information-sharing

By December 2024, the College of Policing in collaboration with force vetting and recruitment units, should ensure that information-sharing practices, including data retention policies, are strengthened in order to prevent those who commit sexually motivated crimes against women and those otherwise unsuitable for policing from remaining in, or moving across, the policing profession.

This requires a number of actions to be completed by CoP and force vetting units by December 2024, many of which we already adhere to as good practice. One area being that we notify the relevant home force of any vetting issues found within a transferee's application.

We welcome the proposed national 'shared referencing protocol' between uniformed services such as the Ministry of Defence, HM Prison service etc, to provide information regarding any past disciplinary or honesty/integrity issues.

Recommendation 12: Right to Privacy

With immediate effect, police forces should convey to all existing and prospective employees that they must be held to a higher standard of behaviour and accountability than members of the public.

L&D and PSD does convey to all existing and prospective employees that they will be held to a higher standard of behaviour and accountability than members of the public, and that therefore their right to privacy can be fettered in certain circumstances.

We do routinely ensure that these messages are disseminated through existing routes such as student officer and leadership days, professionalism newsletters, PSD working groups and ethical dilemma exercises, however we are working with our engagement officer to implement a more impactful communications strategy specifically to this recommendation.

Recommendation 13: Aftercare

By December 2024, the CoP in collaboration with force vetting units should develop a stronger approach to force vetting aftercare in order to monitor an individual effectively throughout their career.

Presently, the re-vet process is part of 'business as usual' within the unit and is largely reactive to a vetting renewal being identified. Where a concern has been raised regarding an individual's vetting, this would immediately be progressed through our vetting unit and, if required, our CCU. The vetting unit would require an additional resource to embed a dedicated 'aftercare prevent' team. This is a timely recommendation as the current vetting establishment is being reviewed to ensure that resourcing and capability can service all necessary demand.

Recommendation 14: Positive culture and elimination of misconduct or criminality often excused as 'banter'

With immediate effect, every police force should commit publicly to being an anti-sexist, anti-racist, anti-misogynistic organisation.

PSD take responsibility to communicate setting the standards and also our responsibility to intervene and take action when the standards are not met. The outcomes are disseminated out across the organisation through organisational learning and also misconduct publications.

The force's refreshed EDI Strategy is soon to be published and will clearly set out the force's position on building a truly inclusive and positive culture with zero-tolerance towards any forms of discrimination.

The Professionalism and Trust team have created a programme of 'Active Bystander' training which is being rolled out across the force to help give people the knowledge and confidence to call out behaviour which falls below our standards, including 'banter' specifically. We pride ourselves on being one of the first forces to deliver this training. Alongside, we also deliver modules for our 'Inclusivity Programme' where we invite key speakers to address issues including misogyny, racism and unconscious bias.

Again, this forms part of our Inclusivity Programme where attendance is being monitored and we have plans to ensure compliance.

Recommendation 15: Reporting by police officers and staff of harassment, sexual offences and inappropriate behaviour committed by fellow officers

With immediate effect, all police forces should take action to understand and confront the barriers that police officers and staff face when reporting sexual offences committed by a person they work with or in the workplace.

New processes within PSD ensure that any complaints of this nature are dealt with the highest standards. These are managed through the DCI who holds strategy meetings for all conduct matters relating to officer behaviours. These include ensuring that the investigation is appropriately resourced, operates in line with investigative policy, the victim is well supported and that any risk is appropriately and expeditiously managed.

The recommendation requires a dedicated reporting process for women in policing who experience inappropriate behaviour related to their gender. Although there are specific supported routes into PSD, the establishment a dedicated process is currently being reviewed and will require some engagement from our Network of Women Association and other groups to confirm the best approach.

Our Cultural Audit pilots have started this month to coincide with the publication of the staff survey results. The Cultural Audit will have two parts, the first will aim to identify elements of hidden culture, including low-level behaviour types which do not reach the misconduct threshold. The second will be a risk profiling exercise, to understand the scale and reach of the issues identified. Through understanding the culture, interventions can be put in place which help to create an inclusive and psychologically safe environment, where 'calling out' and reporting concerns is supported and encouraged.

Recommendation 16: Recruitment and retention of women in police forces:

By September 2024, the CoP and NPCC should review and examine the conditions of female officers and staff in order to encourage more women to join the police.

Although this is a national recommendation, this is a priority for CoLP within our People Strategy and our EDI Strategy. Our recruitment campaigns utilise specific webinars and 'buddy systems' for female candidates. Within the organisation, we have developed campaigns to advertise roles for part-time and flexible working, and also bespoke training and development for women seeking promotion and lateral development.

A Retention and Exiting Board looks to implement retention recommendations such as the National Leavers Framework and as part of this leavers data by demographic is examined to look for trends, opportunities to retain officers and staff and gain a much greater understanding of why people leave the organisation.

IV. Conclusion

The City of London Police has accepted the recommendations made to all forces. We also welcome the national improvements to be made through Vetting APP to enable us to be more robust across our police vetting processes.

We will continue work with our national partners and local departments to improve how we not only respond to masturbatory indecent exposure as a precursor to further sexual conduct, but also how we will continue to make strides to root out officers unsuitable for policing and to prevent the wrong people joining our force. We will also continue in the advances we have made to improve our culture through our inclusivity programme and the upcoming launch of our new EDI Strategy which will hold us to account for improving the experiences of women in policing and across our communities.

Progress against these recommendations will be led by Professionalism & Trust with monthly governance and oversight at CoLP's HMICFRS Operational Improvement Board, chaired by the Assistant Commissioner.

Background Papers:

[The Angiolini Inquiry – Part 1 Report \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Appendices

Appendix 1- The Angiolini Inquiry Part One, Recommendations in full

Author:

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Appendix A – The Angiolini Inquiry Part One, Recommendations in full:

Recommendation 1: Approach to investigating indecent exposure

At the earliest opportunity, and by September 2024 at the latest, police forces should ensure that they have a specialist policy on investigating all sexual offences, including so-called ‘non-contact’ offences, such as indecent exposure.

Recommendation 2: Guidance and training on indecent exposure

By December 2024, the College of Policing, in collaboration with the National Police Chiefs’ Council, should improve guidance and training on indecent exposure, in order to improve the quality of investigations and management of indecent exposure cases. In particular, the College of Policing should:

- a. review and update training, informed by crime statistics and research into the nature of indecent exposure and its impact on victims;
- b. review and update the guidance for police officers to improve the handling of indecent exposure cases;
- c. include guidance on appropriate resourcing for investigations; and
- d. ensure that guidance and training reflect the Sentencing Council guidelines, which recognise factors indicating increased harm and culpability.

This activity should be informed by the results of Recommendation 4 below.

Recommendation 3: Treatment of masturbatory indecent exposure within the criminal justice system

With immediate effect, the Home Office, Ministry of Justice, College of Policing and National Police Chiefs’ Council should work together to conduct a fundamental review of the way masturbatory indecent exposure is treated within the criminal justice system. The review should focus on: recognising the seriousness of the offence; identifying it as an indicator of disinhibition by perpetrators; and understanding and addressing the wider issue of sexual precursor conduct so as to prevent victimisation, improve the response to victims when it occurs and bring more offenders to justice.

Recommendation 4: Research into masturbatory indecent exposure

With immediate effect, the Home Office, in collaboration with the College of Policing, should commission research to establish if there is an evidence-based link between active masturbatory indecent exposure and subsequent contact offending. Where relevant, findings should then be used to shape policy, training and guidance for police officers investigating indecent exposure cases (as per Recommendation 2).

Recommendation 5: Public information campaign on indecent exposure

By March 2025, the Home Office, together with the National Police Chiefs' Council, should launch a public campaign to:

- a. raise awareness about the illegality/criminality and legal consequences of any type of indecent exposure and boost the confidence of victims to report cases of indecent exposure to ensure that more offenders are brought to justice; and
- b. increase publicity around the relevant legislation in order to encourage reporting of unsolicited photographs sent of genitals with the intention to cause harm, distress or humiliation and to discourage perpetrators from doing so.

Recommendation 6: Review of indecent exposure allegations and other sexual offences recorded against serving police officers

By September 2024, the National Police Chiefs' Council, in collaboration with all force vetting units, and building on the results of the recent data-washing exercise, should conduct a review of the circumstances of all allegations of indecent exposure and other sexual offences recorded on the Police National Database and the Police National Computer against serving officers. This is to identify, investigate and ultimately remove those officers found to have committed sexual offences from all police forces.

Recommendation 7: In-person interviews and home visits

With immediate effect, the College of Policing, in collaboration with force recruitment, should ensure that every new candidate applying to become a police officer in any police force undergoes an in-person interview and home visit. This should be designed to provide a holistic picture of the candidate and a better understanding of the candidate's motivations for joining the police and their dedication to serving the public. In particular, this should include the following:

- a. An in-person interview with the candidate to ensure that face-to-face contact is made with the recruiting force before the vetting or onboarding of the candidate is progressed.
- b. A visit to the residence of all new candidates. This should be used as another opportunity, in advance of vetting enquiries, to engage with the candidate, relevant family members or other occupants of the residence, wherever possible.
- c. An integrity questionnaire, used as part of the in-person home visit, to explore fully the candidate's personal attitudes and values, including increased scrutiny of the candidate's motivations and suitability for joining the police.
- d. Corresponding guidance and training for home visits must be developed to ensure that the visits will enable a better sense of the candidate's character, rather than judge living arrangements or socio-economic status.

Recommendation 8: Recruitment and vetting policy, processes and practices

By June 2024, the College of Policing, in collaboration with force vetting units, should take further steps to prevent those unsuitable for policing from joining the policing profession. This should include further developing the Vetting Code of Practice, Authorised Professional Practice on Vetting, and other guidance on recruitment and vetting practices in order to prevent those who commit sexually motivated crimes against women and those otherwise unsuitable for policing from holding the office of constable. In particular, recruitment and vetting policy, processes and practices must be developed in the following areas:

- a. Applicants should be required to undergo an assessment of their psychological suitability for the role (which is not just a questionnaire).
- b. There should be more robust use of the Police National Database during vetting, including as a tool to reveal unreported adverse information about applicants to ensure that potential risks are not missed. In particular, the Database should be used when individuals attempt to move between forces.
- c. Any individual identified as having a conviction or caution for a sexual offence should be rejected during police vetting. This should be clearly outlined in the Vetting Code of Practice and reflected in the Authorised Professional Practice on Vetting, which should consider all contact and non-contact sexual offences.
- d. The Authorised Professional Practice on Vetting should be amended to make it clear that military and/or Ministry of Defence checks should be carried out on all applicants who have served as military reservists.

- e. There should be a fundamental review of the link between debt, mental health, vulnerability to corruption and suitability to be a police officer, to inform vetting decisions. Detailed consideration should be given to the amount of unsecured personal debt held by officers, and rules should be amended to mandate officers to report any significant changes in debt to vetting teams. In addition, the rules should require applicants and officers to provide further insight into their finances, including any payday loans, when requested during the vetting process.
- f. There should be increased rigour in relation to checks for authorised firearms officers, to ensure that vetting standards are met, as well as the introduction of a psychological assessment and an appropriate process for seeking feedback from supervisors or line managers to determine suitability for the role.
- g. No police officer should be onboarded, even if only for initial training, before all vetting is complete. In addition, each officer's force vetting should be completed before their National Security Vetting is initiated. All force vetting information should be passed to National Security Vetting officers for consideration.

Recommendation 9: Professional rigour in decision-making

By March 2025, the College of Policing, in collaboration with force vetting units, should take steps to improve the quality and consistency of police vetting decision-making. This should include encouraging the use of greater professional rigour and curiosity when investigating lines of enquiry, in order to prevent those who commit sexually motivated crimes against women and those otherwise unsuitable for policing from joining the policing profession. These steps should include the following:

- a. Recruiting forces should be able to request that unresolved allegations discovered during vetting processes be reinvestigated.
- b. In collaboration with the National Police Chiefs' Council, a national vetting capability should be created, as an advisory function, to provide another layer of confidence in instances where complex vetting investigations and decisions are required. In such cases, forces should approach the national vetting function to seek proposed lines of enquiry and ensure that they are following an agreed, standardised approach when considering complex cases.
- c. Consideration should be given during vetting to any information or intelligence about police officers being reported missing, regardless of how quickly such reports were closed.

- d. Forces must ensure that force vetting units are complying with and practising Section 6.2 of the College of Policing Authorised Professional Practice on Vetting (2021), which states that force vetting units “must record the results of vetting enquiries; the rationale for refusing, suspending, withdrawing or granting clearance, including with restrictions; and where adverse information has been revealed and considered”. This is to ensure that an audit trail is recorded to give the force confidence in decisions made at the time and to allow future vetting officers to constructively scrutinise vetting enquiries and outcomes.

Recommendation 10: Vetting Code of Practice and transfers

With immediate effect, all recruiting forces should have regard to the new Vetting Code of Practice, which requires the parent force to provide all relevant information requested about the transferee to enable an effective assessment of risk by the force conducting a full re-vet of the transferee.

Recommendation 11: Information-sharing

By December 2024, the College of Policing, in collaboration with force vetting and recruitment units, should ensure that information-sharing practices, including data retention policies, are strengthened in order to prevent those who commit sexually motivated crimes against women and those otherwise unsuitable for policing from remaining in, or moving across, the policing profession. In particular, there should be a focus on the following information:

- a. Previous failures to achieve vetting should be recorded by all forces and flagged to recruiting forces. This should also trigger a re-vet with the current or recruiting force.
- b. A shared agreement should be made about the quality, relevant and necessary content, and sources of information that will be provided in a reference for a future force, also known as a ‘shared referencing protocol’, with directed questions that must be answered (for example, regarding any past disciplinary or honesty/integrity issues). Information to be shared as part of the protocol should be covered within the relevant forces’ fair processing notices. The protocol should apply to all transfers and applications to police forces from individuals in the uniformed services, including:
 - the Ministry of Defence (including the Army, the Royal Air Force and the Royal Navy, as well as their respective reserve forces);
 - fire and rescue services;
 - HM Prison and Probation Service;
 - other police forces; and

- relevant government agencies, such as Border Force or Immigration Enforcement.

This is to improve forces' access to – and ability to use – the totality of information they hold about officers in order to prevent, detect and deal with those likely to commit offences.

- c. As per Recommendation 8(b), there should be expanded access to and use of the Police National Database, including as a tool for revealing relevant uninvestigated adverse information about officers.
- d. Any adverse information or intelligence (developed or otherwise) should be passed by the current Professional Standards Directorate to the receiving Professional Standards Directorate for any officers transferring. No decisions on their appointment should be made until that intelligence has been reviewed, recorded and closed and the vetting units have had time to consider it. If the recruiting force identifies adverse information as a result of the vetting process, this should be shared with the current force for consideration and potential action.

Recommendation 12: Right to privacy

With immediate effect, police forces should convey to all existing and prospective officers and staff that they must be held to a higher standard of behaviour and accountability than members of the public, and that therefore their right to privacy can be fettered in certain circumstances. These circumstances include, but are not limited to: recruitment, vetting, aftercare, transfer, promotion, role change, returning to policing and maintaining standards. This is to ensure that members of the police are fully aware and accountable for the unique powers entrusted to them and the standards of professional behaviour they swear to uphold. Updated fair processing notices concerning changes to processing of personal data should be provided prior to any new processing taking place, including data-sharing.

Recommendation 13: Aftercare

By December 2024, the College of Policing, in collaboration with all force vetting units, should develop a stronger approach to force vetting aftercare in order to monitor an individual effectively throughout their career with the police and be aware of any change in circumstances as soon as possible to ensure that potential risks/red flags are identified and assessed. In particular, that approach should include the following:

- a. Mandatory, randomised re-vetting should be introduced, as an additional layer to standardised vetting periods, for police officers and staff, akin to randomised drug-testing.

- b. In addition to police officers and staff being required to declare any material changes in their circumstances within a managed system, such as a human resources system, supervisors, or anyone with concerns relating to behaviour, welfare or performance, should report them to Professional Standards Departments at any point.
- c. Professional Standards Departments should systematically exchange relevant and necessary information with vetting and counter-corruption units to consider information disclosed by any individual, and any action necessary.

Recommendation 14: Positive culture and elimination of misconduct or criminality often excused as 'banter'

With immediate effect, every police force should commit publicly to being an anti-sexist, anti-misogynistic, anti-racist organisation in order to address, understand and eradicate sexism, racism and misogyny, contributing to a wider positive culture to remove all forms of discrimination from the profession. This includes properly addressing – and taking steps to root out – so-called 'banter' that often veils or excuses malign or toxic behaviour in police ranks.

Recommendation 15: Reporting by police officers and staff of harassment, sexual offences and inappropriate behaviour committed by fellow officers

With immediate effect, all police forces should take action to understand and confront the barriers that police officers and staff face when reporting sexual offences committed by a person that they work with or in the workplace. This is in order to encourage victims, who are also police officers or police staff, to come forward and submit complaints, as well as to identify and remove those who are not fit for service. To do this, forces should:

- a. ensure, when a complaint is made, that sufficient and appropriate resources are dedicated to supporting the complainant, including maintaining anonymity where needed or requested, and ensuring an investigation is carried out as appropriate;
- b. address cultural barriers to reporting, such as re-victimising complainants by labelling or treating them as 'troublemakers'; and
- c. provide dedicated reporting processes for women in police forces who experience inappropriate behaviour related to their gender.

Recommendation 16: Recruitment and retention of women in police forces

By September 2024, the College of Policing and the National Police Chiefs' Council should review and examine the conditions of female officers and staff in order to encourage more women to join the police and progress in policing careers. To ensure success, this should include a review of:

- a. working conditions that do not address the realities of modern working lives, including families where both parents are officers and share caring responsibilities;
- b. processes, training and refreshers for officers returning from parental leave; and
- c. kit, equipment and facilities designed largely by and for men.

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Agenda Item 6

Committee(s): Professional Standards and Integrity Committee Police Authority Board	Dated: 4 June 2024 5 June 2024
Subject: Equity, Diversity, Inclusivity (EDI) Update	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
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 70-24	For Information
Report author: D/Supt Kate Macleod, Professionalism and Trust	

Summary

Internally, the launch and subsequent delivery of our Equity Diversity and Inclusion (EDI) Strategy and refreshed governance framework remain a priority, with much activity taking place this month. We also continue to deliver against our own internal actions plans as well as Nationally driven reporting- a separate paper on your agenda has been produced to address the recommendations from the Angiolini Inquiry.

A range of modules have been produced as part of the new series of offerings under our Inclusivity Programme, the first of these is an anniversary event celebrating the Programme- 1 year on. Being attended by our Commissioner along with guest speakers on EDI, we will also use this as a soft platform to talk about our new EDI Strategy.

Competing action plans and priorities across a number of EDI areas continue to place additional demand however our resourcing levels are now improved with an additional temporary EDI Manager and PC now in place, this will be complemented further by the addition of a Chief Inspector later this year.

Internal Updates

EDI Strategy

We continue to work to our scheduled timetable for delivery of the Strategy, holding consultation sessions and regular updates in the interim with a final draft to be

agreed by mid-June. The draft Strategy has been submitted to the last 3 Professional Standards and Integrity Committees for Member comment and so it will be next be submitted to the Police Authority Board in July.

A Communication Plan has been produced which includes a short animation and video of our own people talking about what the new strategy means for them.

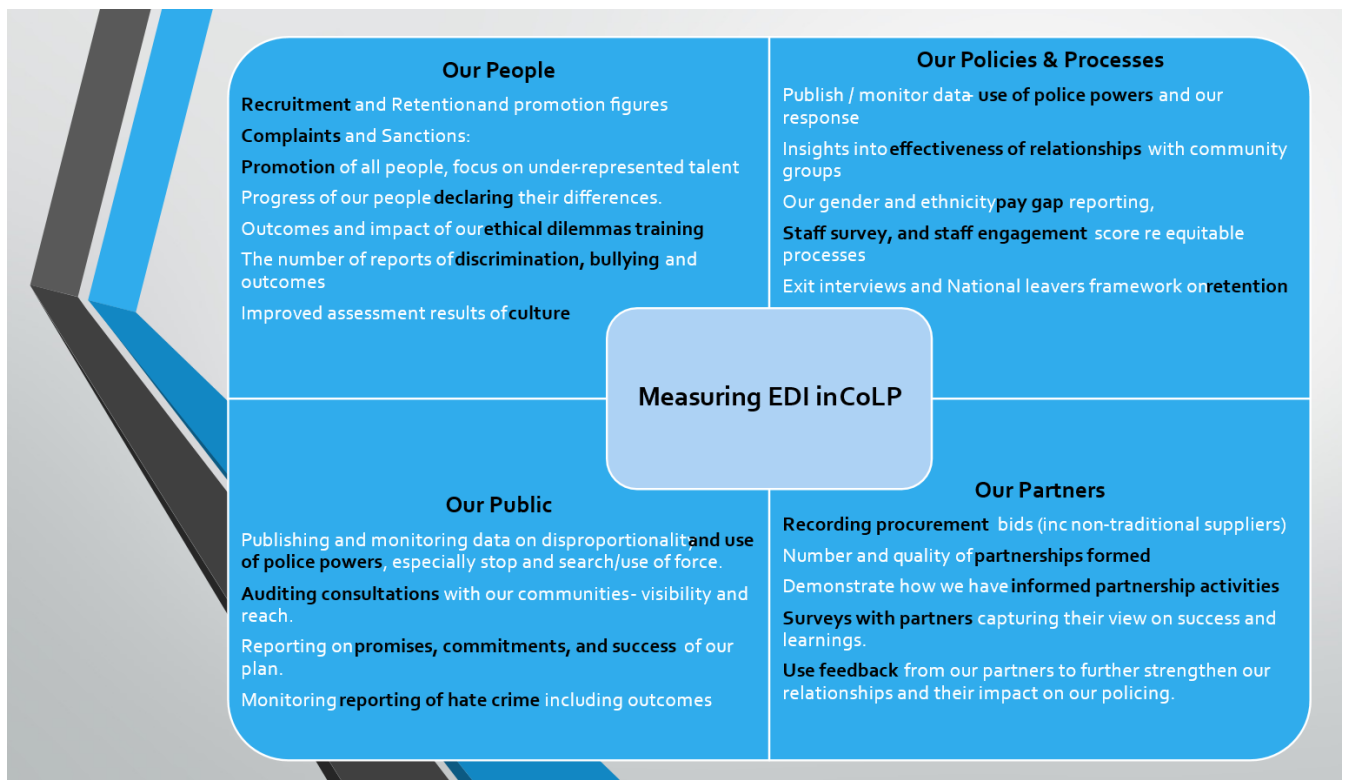
An event is planned for 27th June which will be a celebration of our Inclusivity Programme one year on, this will be attended by Chief Officer Team members with representation from the Corporation, along with those who sign up from our own teams. The purpose is primarily to celebrate the Programme, including the people who have participated in the sessions, and achievements to date. It will include an overview of past and future events, but will also be interactive to check our awareness and next steps. Although it will not be advertised as such, the day will be a spring launch for the new Strategy and an opportunity to test key judgements.

EDI Governance & Accountability

We have presented proposals for our new EDI governance structure to members of our Networks, Staff Associations and relevant Board Members. The changes represent a shift away from a slightly cluttered landscape which required improvement in accountability and measurement, and towards ensuring we are streamlining our processes and checking ourselves against the new Strategy. The full slide deck summarising these proposals can be found at Appendix A.

It is imperative that our EDI governance mechanisms are aligned to our strategy, we need to be able to readily demonstrate the progress we are making against the promises we have made, but also quickly identify areas where such progress is lacking. Dashboards will form a key part of future EDI Strategic Boards, ensuring that we are effectively monitoring our progress and holding our people accountable. The EDI Strategic Board will in turn direct our EDI Operational Board, ensuring that actions given are realistic and achievable.

Dashboards will be produced for each of the '4P' areas, they will provide a picture of our current position along with measurable changes over time. The slide below provides proposed measurements which are being considered for inclusion:-



In addition to our new EDI Strategy, we will also be using this board to keep track of progress made on our localised Police Race Action Plan, our Violence Against Women and Girls Action Plan (including White Ribbon commitments), our Business Disability Forum (BDF) action plan and our other EDI workstreams as assigned by National Police Chief's Council (NPCC).

Inclusivity Programme

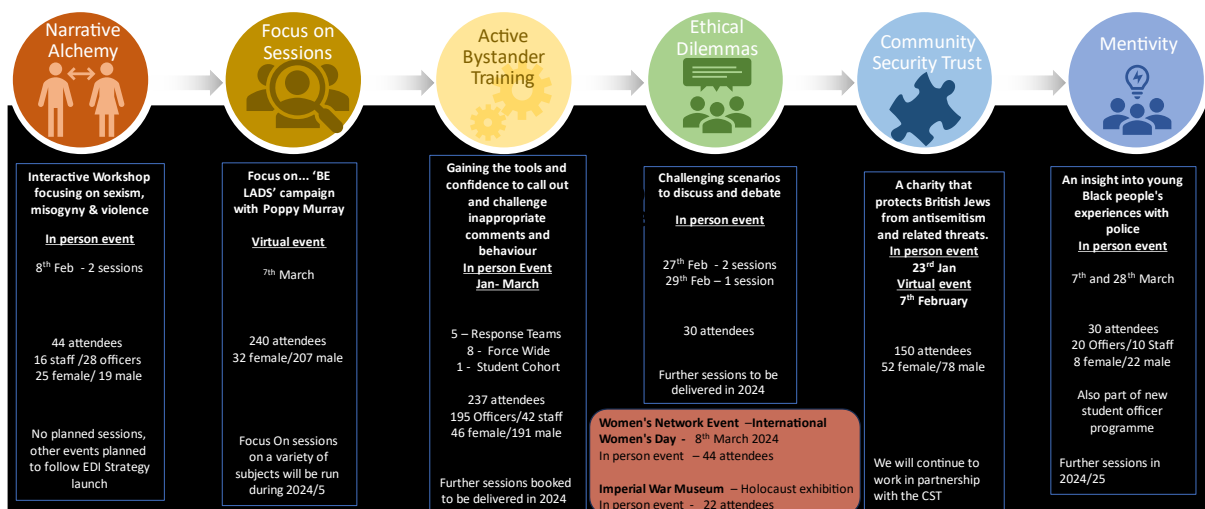
Incorporating feedback from Members, we have now produced our second evaluation of our Inclusivity Programme, the full document can be found at Appendix B. At the behest of Members, we have included an additional slide providing more narrative of what the modules entail.

A reminder that this programme is an attempt to deliver awareness training for all of our Officers and Staff across areas of EDI, moving away from a 'tick a box' one-off classroom delivery, to a flexible programme of modules from which people can attend depending on their learning style and knowledge gap. We continue to focus on providing training which also aids practical policing, equipping officers and staff with skills to help them be better at their jobs. Over the last period, the Inclusivity, Culture and Organisational Development (ICOD) team has delivered as follows:-

- 775 places on Inclusivity Programme modules have been taken between January and March of this year.
- Between October and March, we know that a total of 2,038 places have been taken. Approximately 1,620 employees are eligible to undertake a module and the requirement remains that everyone should complete a module every 6 months, or 2 a year, as minimum.

- All sessions have received a 100% score for ‘would you recommend’ with the exception of 98% for theatre workshops.
- Evaluation has focused on ‘why did you sign up’ and ‘what did you learn’, this will be explored more with interactive elements of event on 27th June 2024
- The qualitative feedback again provides real value, some of these quotes are being utilised in the production of our EDI Strategy.
- Next steps form part of our wider governance i.e. ensuring that we measure the impact that these sessions are having across the ‘4P’s of our strategy.

Our People - Inclusivity Programme modules – Jan – March 2024



Key issues, risks, and mitigations

Demand

A number of important pieces require immediate attention in the EDI space internally, including our Strategy launch (with accompanying wider governance) and our submission to Inclusive Employers; externally pressures abound with new versions of both Race and Violence Against Women and Girls Action Plans, necessitating a review and re-alignment of our existing plans. Analytical support has been requested internally as we proceed to the creation of dashboards and measuring our ambitions.

A new Strategy- So What?

Addressed throughout this paper, there is a cultural risk around our new EDI strategy launch and it simply not ‘landing with impact’. Our Chief Officer Team understand the importance of getting this right and making tangible differences that people can live and feel, not just read about.

This is evident in our launch and Comms plans, where we will use the event at the end of this month to talk about actual progress made and next steps, making this an interactive session. We will also be expecting our Senior Leadership Team

to step up and make pledges in this space, which will be displayed on the day with a promise to follow up one year on. Once our new governance is in place and in a bid to be more transparent, we also have plans to produce a regular EDI update infographic, showing our people what has been discussed at board level, actions pledged and timeframes. Finally, a number of future modules have been planned and will be ready for advertising at the same time, thereby acting as 'hooks' for the strategy which have actual policing benefit, see table below:-

Date	Title	Content
25th June	Focus on LGBTQ+ Sexual Orientation	This will explore • What police need to know- Terminology • What is sexual orientation • What it means to be a part of the LGBTQ community • What the letters and + represent • LGBTQ+ people through history • The historical experience of LGBTQ+ people in the UK
27th June	Anniversary Event celebrating Our Inclusivity Programme: 1 year on	Celebrating the one year anniversary of Our Inclusivity Programme, participants are invited to attend one of two sessions taking place in Classroom 1 at New St. Attendees will hear from guest speakers about personal journeys and success stories, Chief Officer/s will present on our new EDI Strategy and what this means.
3rd July	Focus on Transgender	An opportunity to hear a personal story from a well-known Trans actress who will talk about the challenges she has faced from her childhood through to her professional life.
25th July	Focus on Gender Identity	What is gender? What does gender identity mean? How do we talk about gender openly and inclusively? This webinar aims to discuss the basics of gender, gender identity and gender expression to clear up some misconceptions and give you the confidence as Officers and Staff to approach conversations with knowledge and understanding.
August TBC	Focus on Anti-Muslim Hate	To be provided by TellMama, dates to be confirmed
Summer TBC	Equality Impact Assessments	Practical input from College of Policing on how to complete EIAs in force, helping us to perform better and provide a better service to our community through properly considering EDI as part of our operational engagement.
10th Sept	Joint event with PwC celebrating LGBTQ+ & Parenting	Following successful session delivered by PwC, an opportunity for us to work together and replicate for our own organisation.
26th Sept	Focus on Violence Against Women and Girls in the City	An opportunity to update our people on work being undertaken in this area- including local policing initiatives (Op Reframe, Walk & Talk, Ask for Angela) and Head of Crime re relentless pursuit. With guest speakers.
Various	Ongoing inputs- Mentivity (impact of police use of force on black communities), Active Bystander, Ethical Dilemmas.	

Notable national issues and developments

National Police Race Action Plan (PRAP)

Deputy Assistant Commissioner Dr Alison Heydari is the Programme Director for the Police Race Action Plan, in recent communications she has made it clear that the Plan is here for the long term:- 'this work can and must continue to drive the meaningful change we need'. In the next two months, it is expected that the National team will release their new version of the plan, this will include a framework which reflects a commitment to change and a proposal for future delivery plans. Locally, we will need to incorporate these changes as appropriate, appreciating we have only recently launched our localised version of the plan and agreed ownership for the 13 priority areas.

Violence Against Women and Girls

In March this year, a refreshed Violence Against Women and Girls National Framework for Delivery was launched, along with a self-assessment tool to help forces measure delivery against local Violence Against Women and Girls action plans. The National Police Chiefs' Council (NPCC) Violence Against Women and Girls taskforce has agreed that forces are required to complete the self-assessment tool attached to the Violence Against Women and Girls Framework for Delivery for 2024-2027 for HMICFRS as well as the ongoing self-assessment forms for Operation Soteria. Locally, we also need to complete our White Ribbon Action Plan; we have ensured all items will be on the agenda for our new EDI Boards and progress will be monitored.

National Changes EDI NPCC and College

Following discussions between Chief Officers of the College and EDI NPCC leads, the decision has been made to cease the EDI consortium meetings and replace them with regional meetings, led by the respective Senior Culture and Inclusion Adviser for that area. These meetings will then feed in to the 'DEI-LN' ('Leadership Network) meetings which take place quarterly. We are told that EDI leads from forces will be contacted by their advisers in the near future to arrange a date for the first meeting which will be held online, CoLP are linked in via relationship with National Portfolios and the College.



A senior EDI delegation from the College of Policing visited our force on 25th April, we spent a day updating them on our workstreams (including an input from T/Commissioner Pete O'Doherty and took advantage of the opportunity to check our progress on EDI themes and our future plans.

Forward look

Staff Survey and Cultural Audit

Our cultural audit aims to uncover elements of hidden culture which impact on how people feel at work (low level type of behaviors not reaching misconduct). It also includes a 'risk profiling' exercise, to understand the scale and reach of the issues identified. Through understanding the culture, interventions can be put in place which help to create an inclusive and psychologically safe environment, where 'calling out' and reporting concerns is supported and encouraged.

Since last reporting, the pilot phase has begun, with focus sessions taking place with the workforce over this period (April-June '24). Initial feedback has been strong, with participants referring to the force acting upon staff survey results as refreshing. The delivery plan timeframe allows for the analysis phase to begin later this month with reporting commencing in late July/August.

Code of Ethics

The Code of Practice launched on the 24th January 2024, at the previous meeting a report was presented which described how this puts a responsibility on Chief Officers to ensure openness and candour within their force and includes a range of issues which Chiefs should consider when doing this. In force, we have an agreed delivery plan being led by a T/Commander, this supports the implementation of the code and its principles throughout the organisation, to improve the service provided to communities, as well as creating workplaces promoting inclusion, dignity and respect.

As are aware that HMICFRS will include the Code of Ethics as part of their inspection programme in 2025, we are making use of the College Culture and Inclusion Teams to support us in making the most of these opportunities. We have also made online College of Policing modules mandatory for all and will be reporting compliance data through our internal governance.

Sponsorship Programme

This launched in April following our work consulting with NHS National Finance Academy, who have run a programme for 4 years, and our external consultant volunteers. Two briefings have been delivered to potential sponsors and those being sponsored (Black and Asian officers and staff), covering: What is Sponsorship? Benefits to sponsor/those being sponsored and the wider organisation, why we are focusing on Black/Asian colleagues (initially), and next steps. By early this month we will have completed profiles for all interested parties and ICOD colleagues will have completed initial matching and 'chemistry' meetings. CPD events are being arranged once pairings are established and workbooks being prepared.

Inclusive Employers Accreditation

The window for submissions to Inclusive Employers is now open, closing on 28th June 2024. We have produced a comprehensive plan to ensure we are gathering our best evidence from across all directorate areas in ample time to properly review our submission, we aim to improve our rating on their Maturity Model from 'compliant' back in 2020 to at least 'established'. This target area is defined by Inclusive Employers: 'We actively promote diversity and inclusion and the business case, making sure it's a regular and established part of what we do'. It is not clear when results will be available but based on discussions and last year's timetable, they are anticipated for release around September 2024.

Kate MacLeod

Detective Supt

Professionalism and Trust

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(Appendix A)

EDI Governance- Proposal

April 2024

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Det Supt Kate MacLeod

www.cityoflondon.police.uk



INVESTOR IN PEOPLE

Professionalism & Trust Portfolio

Directorate Head

T/Chief Superintendent Sanjay Andersen

**Inclusivity, Culture, &
Organisational Development
(ICOD)**

Learning & Development (L&D)

**Professional Standards
Department (PSD)**

Head of ICOD
Detective Supt Kate MacLeod

Director of PSD
Detective Supt Carly Humphreys

ICOD
Chief Inspector Jason Selvarajah

Head of L&D
Chief Inspector Dan Murphy

Det Chief Inspector Amanda Lowe

Ian Younger (F)

Summary of Proposals

- Re-alignment of terminology- 'Equity, Diversity and Inclusion'
- Creation of a two-tier governance approach (EDI Strategic Board and EDI Delivery Board)
- CoT to accept terms of reference for EDI Strategic Board and EDI Delivery Board (for onward consultation at inaugural meetings)
- Discontinuation of Renewing and Rebuilding Trust and Confidence (RRTC) Board
- Driving our EDI strategy through dashboards and action feeds.
- Ensuring updated attendee lists to ensure prioritisation by Chief Officers and include more external scrutiny

EDI Strategic Board- Overall Ambition

“The Equity, Diversity & Inclusion Strategic Board is the formal governance to ensure that CoLP is delivering its EDI strategy, including its legal obligations under the Equality Act and our ‘4P’ ambitions as a force”



EDI Strategic Board- Purpose

Understanding
Disproportionality-
Our Public and
Communities

Understanding
Disproportionality-
Our Officers and
Staff

Maximising Best &
Effective Practice

Delivering
excellence through
our action plans

Identifying and
Mitigating Risks

Driving Creativity
and Innovation

Evolving the right
Culture and
Leadership

Ensuring effective
communication
and engagement

Enabling finances
and resource

EDI Strategic Board- Attendees

INTERNAL

- Commissioner (Chair)
- Chief Officer Local Policing
- Chief Officer Specialist Operations
- Chief Officer Corporate Services
- Chief Officer National Lead Force

- Head and Deputy Head Professionalism & Trust
- Head of Human Resources
- Head of Professional Standards Directorate
- EDI Manager
- Head of Communications and Engagement

- Network Representation (elected or on rotating basis)
- BPA Representation (due to focus on PRAP)
- NoW Representation (due to focus on VAWG)
- Federation Representation
- Union Representation

EXTERNAL

- Corporation Representation
- IASG Chair or elected member
- Representation from Business Community / Chamber of Commerce
- HMICFRS / IOPC representation

EDI Strategic Board – Proposed Agenda Items

- Apologies for absence

- Minutes

- Risk Register & Actions outstanding

- High Level verbal update of EDI Delivery Board

Our People dashboard (Measures as per EDI Strategy- RAG rated)

Our Public dashboard (Measures as per EDI Strategy- RAG rated)

Our Processes & Policies dashboard (Measures as per EDI Strategy- RAG rated)

Our Partners dashboard (Measures as per EDI Strategy- RAG rated)

VAWG dashboard (Exceptions / 3 critical areas)

PRAP dashboard (Exceptions / 3 critical areas)

SNA Representative (Exceptions / 3 critical areas)

Communication & Engagement Overview (including forward look calendar)

AOB

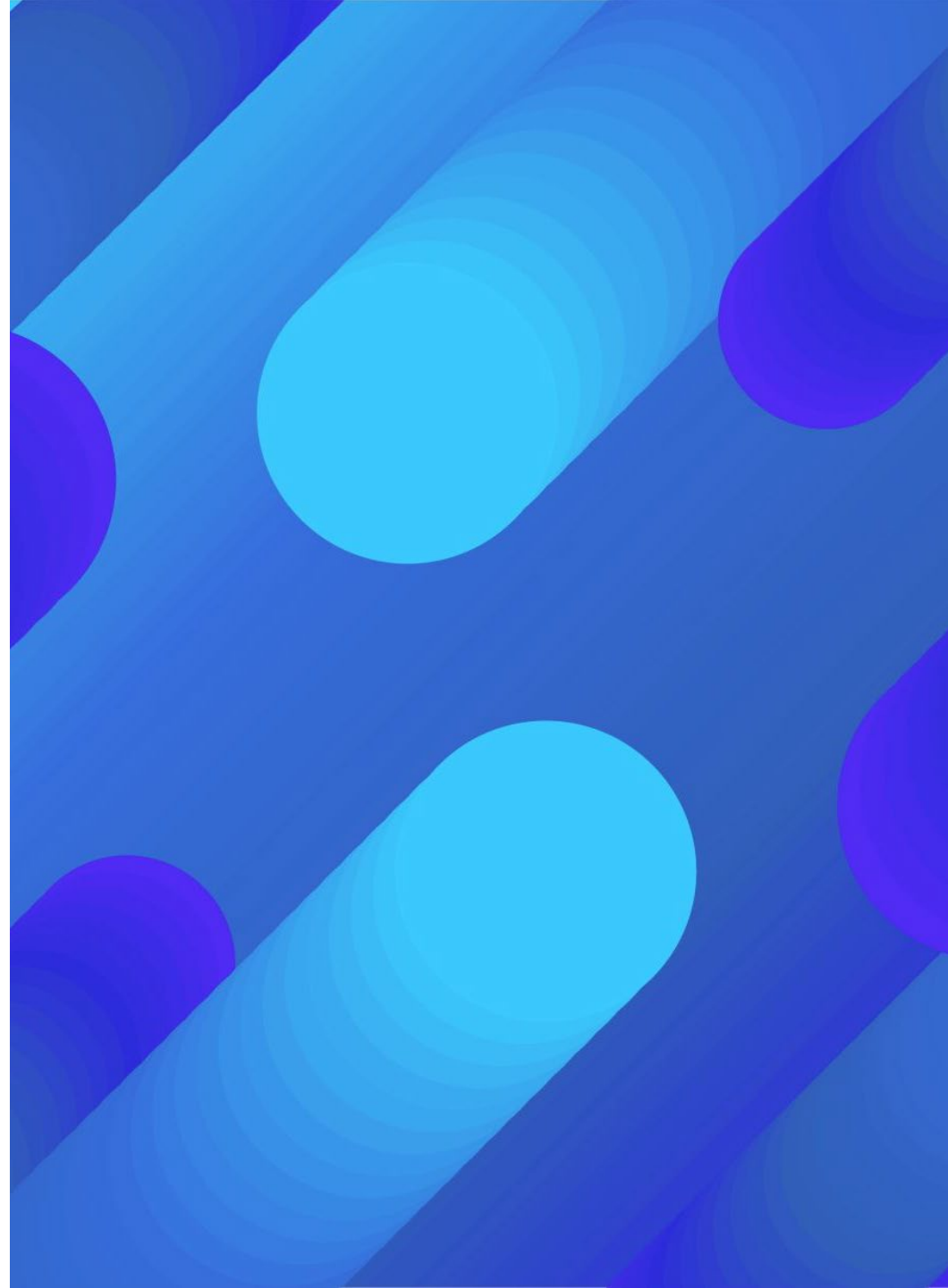
EDI Strategic Board - Key Points



Overall Ambition- EDI Delivery Board

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“Delivering equity, diversity and inclusion for the public we serve and the people we lead, helping the EDI Strategic Board meet its obligations”



EDI Delivery Board - Purpose

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Delivering our promises on EDI workstreams (including VAWG and PRAP)

Enabling the conditions to allow the right culture and leadership to evolve

Becoming an employer of choice

Providing an excellent service to the public

EDI Delivery Board- Attendees

- INTERNAL
 - Head of Professionalism & Trust (Chair)
 - Head of Inclusion, Culture and Organisational Development
 - E&I Manager

 - Workstream Lead Recruitment & Onboarding HR
 - Workstream Lead Retention & Exiting NLF
 - Workstream Lead Community Engagement LP
 - Workstream Lead Leadership & Culture NLF
 - Senior representation from other Directorates (SO)

 - Network Representation (all networks)
 - Federation Representation
 - Union Representation

 - Head of Professional Standards Directorate
 - Head of Communications and Engagement
 - Head of Finance
- EXTERNAL
 - Corporation
 - IASG

EDI Delivery Board - Key Points



EDI Delivery Board Proposed Agenda items

- Apologies for absence

- Minutes

- Risk Register & Actions outstanding

- High Level verbal update of EDI Strategic Board

- Assigning new actions arising from EDI Strategic Board

PRAP Update (Exceptions / 3 critical areas / red or amber only)

VAWG Update (Exceptions / 3 critical areas / red or amber only)

Workstream Update- Recruiting and Onboarding (Exceptions / 3 critical areas)

Workstream Update- Retention and Exiting (Exceptions / 3 critical areas)

Workstream Update- Community Engagement (Exceptions / 3 critical areas)

Workstream Update- Leadership & Culture (Exceptions / 3 critical areas)

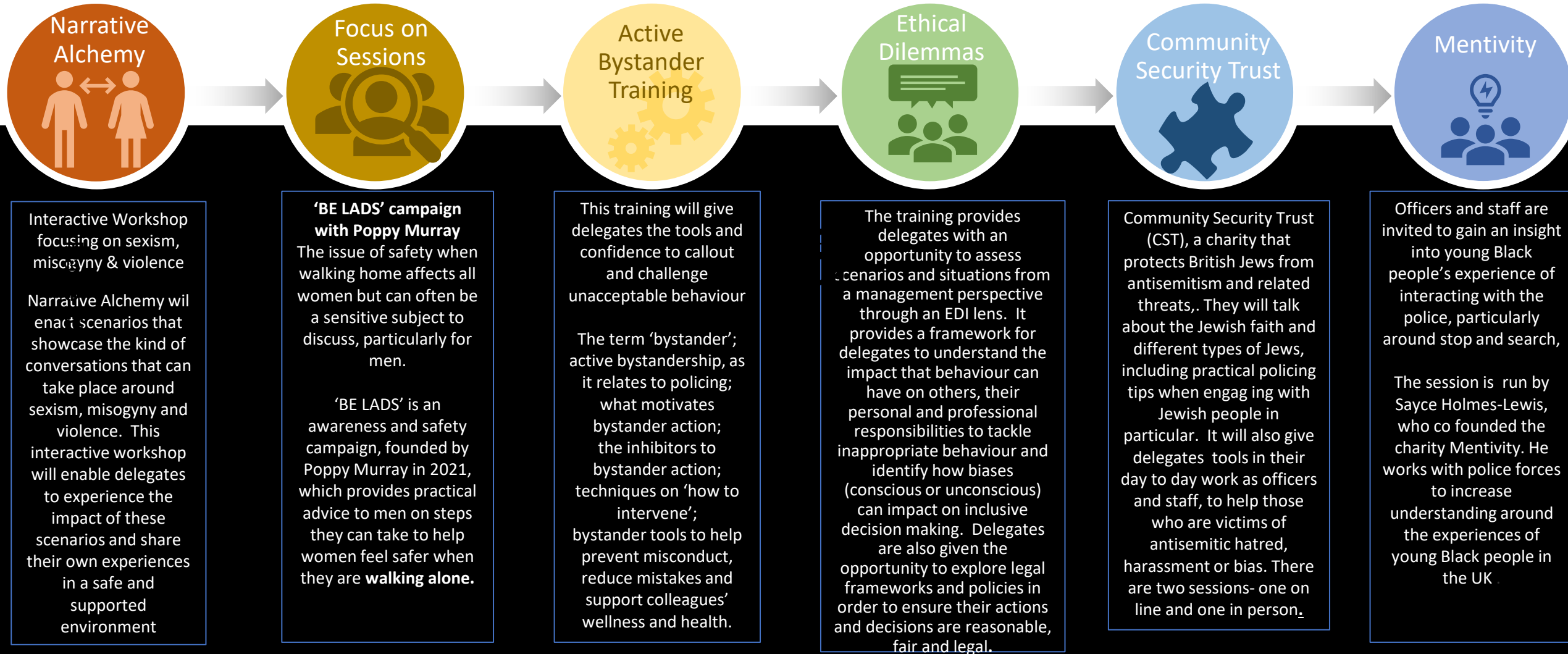
SNA Updates (New reporting template, critical areas of risk only)

Communication & Engagement

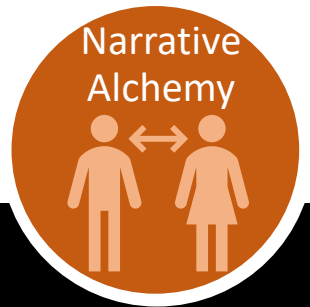
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Our People - Inclusivity Programme modules – Jan – March 2024



Our People - Inclusivity Programme modules – Jan – March 2024



Narrative Alchemy

Interactive Workshop focusing on sexism, misogyny & violence

In person event

8th Feb - 2 sessions

44 attendees
16 staff /28 officers
25 female/ 19 male

No planned sessions, other events planned to follow EDI Strategy launch

Focus on Sessions

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

Virtual event

7th March

240 attendees
32 female/207 male

Focus On sessions on a variety of subjects will be run during 2024/5

Active Bystander Training

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

In person Event

Jan- March

5 – Response Teams
8 - Force Wide
1 - Student Cohort

237 attendees
195 Officers/42 staff
46 female/191 male

Further sessions booked to be delivered in 2024

Ethical Dilemmas

Challenging scenarios to discuss and debate

In person event

27th Feb - 2 sessions
29th Feb – 1 session

30 attendees

Further sessions to be delivered in 2024

Women's Network Event –International Women's Day - 8th March 2024
In person event – 44 attendees

Imperial War Museum – Holocaust exhibition
In person event - 22 attendees

Community Security Trust

A charity that protects British Jews from antisemitism and related threats.

In person event

23rd Jan

Virtual event

7th February

150 attendees
52 female/78 male

We will continue to work in partnership with the CST

Mentivity

An insight into young Black people's experiences with police

In person event

7th and 28th March

30 attendees
20 Officers/10 Staff
8 female/22 male

Also part of new student officer programme

Further sessions in 2024/25

Narrative Alchemy



98% stated they would recommend this module to others

Why did you sign up?

3% PDR requirement

Reflect on behaviour and seek change

It sounded interesting and I wanted to hear new approaches to challenging situations

The approach sounded interesting.

It was an interesting subject

The approach sounded quite novel and interesting. Also as a HeForShe ally, driving changes towards gender equality, the theme was of particular interest to me.

Topic was relevant

I attended a previous session many years ago with this company and found the input very good



What did you learn?

Reflect on behaviour and how comments can be viewed from other perspectives

The usefulness of stories - I work in training.

Everyone is affected differently

Different types of sexism and the different forms of violence

Sexism can be more than just direct easily identified behaviour

I learned that men can also be subjected to sexism by women.

Usefulness of honesty and challenging pre-conceptions.

To differentiate between sexism

We have considered the feedback and would like to develop more theatrical workshops in future; nothing planned presently due to alternative priorities and time / planning involved

Focus on



BE LADs with Poppy Murray

100% stated they would recommend this module to others

Why did you sign up?

1% PDR requirement

To enhance my understanding on how to make a safer environment for women both in and out of work

Wanted to know more about what I can do to help females feel safe.

Really interested to hear about the BE LADs initiative

To be a better manager

I have always considered this a problem since I started socialising as a teenager, really good to learn about it

As I get older I am more and more aware of the possible stress and discomfort I may have been causing. I was incredibly relieved to see that Poppy had put together a relevant, comprehensive and teachable package.

What did you learn

I will definitely look at females safety as a priority and identify any unacceptable behaviour which needs to be challenged.

It cemented my views and I will continue to act in a way that does not cause, or appear to cause, any threat to other members of the community

I learnt a huge amount about the BE LADs initiative and will certainly try to follow all the suggestions to make women and girls feel safe.

Clear simple advice for me that can help men to make women feel more comfortable. This is what I can then pass onto and share with men who are my colleagues and friends.

More conscious of concerns lone females may have in certain situations. To adjust actions accordingly I will make some changes to my behaviour when I am out alone and have already passed on this on advice given to others.

Poppy kindly agreed for her final module to be recorded, so this is now available on our CityNet

We are working with BeLads to see how we can further embed approach with our partners / community, Poppy Murray has presented to our CoL Crime Prevention Association and we are exploring future options

Active Bystander



100% stated they would recommend this module to others

Why did you sign up

8% PDR requirement

Interested in what it would entail.

To improve my confidence in intervening

As a new supervisor I thought it would be useful

Always keen to understand how we can better challenging and dealing with issues.

I wanted to know more about challenging inappropriate behaviour or stepping in at right times.

Enhance my understanding.

Because I wanted to learn the best way to be an active bystander in and outside of work

The course offered subject was different to any other training i have attended

Was intrigued by the topic

What did you learn?

The effectiveness of learning to deal with matters directly and in a timely way

How important it is for early intervention on potentially inappropriate behaviour/comments

Will try to "call in" people who I think are being inappropriate, rather than "call out"

As a supervisor for Police staff in a predominantly police environment, there are options to resolving challenges

that don't need to resort immediately to PSD referral. It was refreshing to know that supervisors (and staff alike) can use common sense to address behaviours in the work place

Its an important filter to make consideration of during decision making,

Be more aware of everyone around when behaviour crosses the mark and step up to challenge

I learnt how I can intervene when colleagues or general people act or say inappropriate things

Different approaches to dealing with different situations/people.

To actively challenge and try to solve issues at low level

A lot was learned such as what to do and would implement this on day to day

Responsibilities as a supervisor



We have planned 12 more open sessions booked for 2024, which is 2 a month. We will continue to deliver it as part of the Student Officer programme.

Ethical Dilemmas



The plan regarding further roll out is:

We are running 10 more sessions for Supervisors over the next six months.

We are delivering bespoke sessions to all Senior Leadership Teams over the next few months. (we delivered a session to the Senior Leadership Forum which received positive feedback)

We are delivering a module as part of the Chief Inspector Modular programme

It will be incorporated into our future Police Leadership Programme 2024/25

We will be running Ethical Dilemma Challenge Panels in the Autumn

The updated Code of Ethics has been incorporated into all programmes



Future sessions as outlined are arranged for 2024/25

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.

100% stated they would recommend this to others

Why did you sign up?

3% PDR requirement

I was interested in learning more about current issues effecting the Jewish Community

To get a better understanding of the UK Jewish community and their challenges, especially antisemitism.

It was of interest to me with regards to my work in custody.

To get a better insight into the Jewish community, the threat to them and their perspective

To gain further understanding of the challenges faced by the Jewish community and how it relates to policing

I have lots of Jewish friends, I live 200m away from a synagogue in Woodford Green and I like to hear how the Jewish community are interacting with the police to protect themselves.

I don't really know a lot about the Jewish community so I wanted to increase my knowledge.

Under Inclusivity but also have a personal interest as a close friend was in Sderot at the time of the attacks in Israel.

My great grandparents were Jewish, I have a strong affiliation and interest.

What did you learn?

I learnt an incredible amount which I was not aware of especially the life of ultra orthodox communities and also

the commitments of CST to look after their communities and engage with the Police

The way I would treat a person of the Jewish Faith whilst in custody.

I have already referred the CST to a member of the Jewish community who has significant concerns about the rising crime and requires support

I am so impressed that CST has a national control room.

I learnt about the Jewish faith, the threats whilst going about daily life and about what is in place to support the community

I have already advised my friend of your organisation, how to distinguish between anti-Semitic behaviour.

I learnt about the Jewish community, their traditions and the religion and also about the existence of the CST and their role within the community and alongside the police



We have already worked with CST as a Force and it is around showing a balanced approach and including 'tell mama' in future for anti-muslim hate awareness (albeit not a political thing when planned, just circumstances now).



100% stated they would recommend this module to others

Why did you sign up

2% PDR requirement

To enhance my understanding of issues surrounding the police's relationship with ethnic minorities.

People who attended previously said it was good

I was interested in the topic from a different perspective

I was interested in the speakers experiences with the police.

From the list of "our people" training/events I chose the two that I thought would be most interesting/helpful.

To learn more about Stop & Search and how it impacts the community

Interested in the black experience with the police

What did you learn

This enhanced my learning around unconscious bias, conscious bias and racism in the public realm. I would seek to utilise this more in my role as a constable on the frontline.

I learned that I can challenge.

To be mindful that previous interactions with the police may not have been positive, but my actions can change the viewpoint

I think I will take the trainers experiences and weigh them up with my own going forward.

I learnt how the police impact on the black community and how I can adapt my approach going forward

I am honestly still thinking about the whole presentation 5 days afterwards, and seeing things a lot differently!

The impact of conscious and un-conscious bias, being mindful of how you treat others

I am black and i understand what it means to be judged even before you speak. basically don't judge

I already knew of how the police can be perceived however the world we live in still needs to change on both fronts, there needs to be joint working to make a difference. Not everyone is fortunate and remember this in my day-to-day role. Have empathy and compassion where needed but also ensuring I do the role professionally.

To the police, it is our job, but the impact on people's lives is significant. Communication is key.

Makes me more confident recognising microaggressions



Future sessions arranged for 2024 focussing on Local Policing in the first instance.

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

International Women's Day – 8th March

This event was organised by the CoLP Women's Network.

The event was opened by T/Commissioner Pete O'Doherty

Speakers included:

Alderman Professor Emma Edham – Deputy Head of International Law

L/Cpl Natasha Day MBE, Royal Army Medical Corps

44 attendees (50 places)


15 officers, 29 staff

10 male, 34 female

Feedback

There was very positive feedback regarding the speakers (the topics covered and variety of experience), people also enjoyed that the Women's Network were hosting an event at City of London Police, and they enjoyed the networking. As a result of the event, 4 people asked to join the network

This event was included as a module within the Inclusivity Programme



The Women's Network publicise a range of external talks on their Teams Channel. They have an active Executive Committee. Membership is 110.

Team Day



Members of Professionalism and Trust attended The Imperial War Museum

22 attendees

The team organised a team day out as one of their Equality and Inclusion models.

They visited the Holocaust Galleries at the Imperial War museum which told the history through photos, books, artworks, letters and personal objects of those that suffered and were murdered during the Holocaust.

It was great that the flexibility of the Inclusivity Programme enabled this to take place.



As part of the 2024/25 Inclusivity Programme, we want to highlight the different ways people can further their understanding of equity, diversity and inclusion

Agenda Item 7

Committee(s): Professional Standards and Integrity Committee Police Authority Board	Dated: 4 June 2024 5 June 2024
Subject: City of London Independent Custody Visiting Scheme	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	Diverse engaged communities; vibrant thriving destination
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: The Town Clerk & the Commissioner of the City of London Police	For Information
Report author: / Rachael Waldron, Police Authority Compliance Lead, Town Clerk’s Helen Isaac, Superintendent Criminal Justice Services / Sanjay Andersen, T/Chief Superintendent Professionalism & Trust	

Summary

This report provides an overview of the City of London Independent Custody Visitor Scheme and the current position with regard to membership and recruitment processes. The ICV Scheme has seen volunteers fall from seven to four and is in the process of recruiting, with the ambition to increase this by eight new volunteers. The Police Authority Team and the City Police have developed and agreed a process to improve the effectiveness and efficiency of the on-boarding and ongoing maintenance of the ICV Scheme volunteers, providing clarity on roles and responsibilities.

The report proposes an annual report to PAB on custody issues and Equality, Diversity and Inclusion (EDI) data to ensure scrutiny of this key area of business. It further proposes that this should be timed to coincide with the annual ICV report to present a full picture of custody issues and performance for scrutiny.

Information on Custody Detention Scrutiny Panels (CDSPs) is also provided, with an update on how the City of London proposes to commence this work using existing scrutiny arrangements. Following an Independent Advisory Panel on Deaths in Custody (IAPDC) report which noted that ‘PCCs should lead local scrutiny Panels and expand their focus to include the examination of data relating to custody performance,’ national guidance has been provided to assist PCCs and Chief Constables decide how best to implement this in their respective forces. The report proposes that the City of London use existing scrutiny from ICVs and the Independent Advisory and Scrutiny

Group (IASG) to commence this work, with a view to developing this as the groups stabilise through volunteer recruitment and under the leadership of new Chairs.

Recommendation(s)

It is recommended that Members note the content of this report and note the proposed implementation of the Custody Detention Scrutiny Panel approach for the City of London.

That an annual report on custody is provided to PAB, to contain an overview of custody issues and include management information and data on vulnerability, use of force and EDI.

Main Report

Background

1. The Independent Custody Visitors (ICV) Scheme, formerly known as Lay Visiting, was introduced in the first half of 1981 following a recommendation in Lord Scarman's report into civil disturbances and outbreaks of spontaneous unrest in major cities throughout the country – in Bristol, Liverpool, Manchester, the West Midlands and London (most notably the Brixton Riots of 1981).
2. The cause of these disorders centered around several complex political, social and economic factors. Many of the concerns expressed focused on a loss of confidence and mistrust in the police and their methods of policing, particularly across Black and global majority communities.
3. The resulting investigation (the Scarman Report) included several recommendations about law reform, community relations and policing practices. It advocated for a system of independent, unannounced inspection of procedure and detention in police custody by members of the local community to inspect the way police detained people in their custody.
4. Since the production of this report, panels of ICV have evolved throughout the United Kingdom as an essential means of securing police accountability for the local communities they serve.

The Police and Criminal Evidence Act 1984

5. Many of the Scarman Report recommendations were included in the Police and Criminal Evidence Act (1984) and subsequent revisions in 2008 and 2013. This Act sets out the way in which police officers must perform their roles and stated specific codes of practice for police procedures; most commonly, under Code C of the PACE Act which established the rights of people detained in police custody for a suspected crime or offence.

The Police Reform Act 2002

6. Section 51 of the Police Reform Act (as amended) places a statutory obligation on local policing bodies in England and Wales to make arrangements for detainees to be visited by ICVs. Local Policing Bodies are responsible for recruiting, selecting and appointing ICVs.
7. These guidelines and codes of practice provide the main reference point for independent custody visitors as they carry out inspection and check on the treatment and welfare of people held in police custody and play a vital role as:
 - i) the only fully independent review of detainee treatment of those in police detention
 - ii) independent check on the extent to which the rights of individuals detained in police custody are being respected.

City of London Independent Custody Visiting Scheme – current position

8. An annual report providing an overview of the operation of the City's ICV Scheme is submitted to the Police Authority Board for information (most recently in October 2023). In September 2023, the City Scheme was assessed as being 'compliant' against the requirements set out in the Independent Custody Visiting Association's Quality Assurance Framework (QAF).
9. Since October 2023, membership of the City of London ICV Scheme has reduced from seven volunteers to four. This reduction occurred as a result of one member resigning, a second member withdrawing from the City Scheme and the untimely passing of the Chair in December 2023.
10. The vetting and retention of ICVs has been impacted by a number of factors, these include: prioritisation of the vetting of Police Officers to ensure that the CoLP Police Uplift Programme national commitments were met, some ICV members not wanting to be vetted to the level required and some delays in the vetting team receiving application requirements from potential members.
11. These factors combined, have led to an overall reduction in membership and frequency of visits to Bishopsgate custody.
12. In response, the Police Authority Team and the City Police have developed and agreed a process to improve the effectiveness and efficiency of the on-boarding and ongoing maintenance of the ICV Scheme volunteers, providing clarity on roles and responsibilities. This process is included at appendix 2. The process has been implemented and communicated with the existing ICV cohort and will be shared with new volunteers joining the Scheme.

13. The on-boarding process has been added to the Force's internal ICV Standard Operating Procedure (SOP) and guidance on the vetting procedure taken from this document has been shared with the Police Authority Team. This will assist with enquiries from potential ICVs about the information required and why this is necessary.
14. To ensure that the City Scheme continues to meet its statutory requirements in relation to custody visiting practices, the City ICV Scheme Manager undertook a recruitment campaign, which saw the distribution of an ICV Recruitment Advertisement via a range of Corporation channels in March and April 2024.

This advert was distributed through a range of established Corporation resident communication channels in March and April (2024)
 - a) *Inclusion of ICV recruitment advert details in Estates, Community and Children's Services, City Lending Library sites and corporate communications channels*
 - b) *Outreach routes via Livery Companies and their networks*
 - c) *Further engagement with funded organisations working in the Criminal Justice space via City Bridge Foundation and Bridge House Estates colleagues.*
15. The internal recruitment exercise yielded five expressions of interest, which the Police Authority followed up directly with applicants in mid-April (2024).
16. It is anticipated that the Police Authority will be able to interview applicants in mid-June (2024) and progress NPPV2 Vetting Clearance for successful applicants to the Force once the interview process has concluded.
17. Nominations will be sought from members of the Independent Custody Visitors (ICV), for the position of Chair and Vice Chair by the start of the new financial year in April 2025. This will provide a sufficient period of time for applicants to attain NPPV2 clearance from the Force, and successfully complete a 6-month period of "on the job" training and mentoring whilst in their probationary period.
18. The probationary period will be focused on the undertaking of visits in tandem with experienced colleagues and will involve developing and consolidating skills at Bishopsgate custody, as well as discussing practical issues and difficulties after visits have been completed at local panel level.
19. Further refresher training will be provided throughout a member's term as ICV to ensure that they are smoothly integrated into the Panel and satisfactorily equipped to address legal, procedural and Health and Safety requirements and develop best practice emerging from the visiting process.
20. The Police Authority aims to provide a suitable balance of ICV in terms of factors such as age (18+), gender and ethnicity. This inclusive approach will

extend to those with disabilities, and those who do not have English as their first language. It will provide opportunities for the Police Authority Board to receive a more diverse range of insights on policing matters from members of the community.

21. More widely, the Police Authority will complete the onboarding process for newly appointed Independent Custody Visitors (ICVs) at the earliest opportunity and will work towards achieving its ultimate target of appointing eight new volunteers to the City Scheme.
22. The Police Authority will place a further five to six applicants on a wait list by December 2024, for the purpose of ensuring better operational resilience across the existing voluntary Scheme; and to demonstrate greater compliance ahead of the Independent Custody Visiting Association (ICVA) forthcoming Quality Assurance Framework Assessment (QAF) which is expected to commence in April 2025.
23. More widely, the Police Authority will ensure that vacancies for the City Scheme are well publicised with partners working in the Criminal Justice space, via means such as online community networks, resident newsletters, ebulletins and social media channels. Further vacancy details will also be placed with a small number of recruitment agencies to promote interest in joining the Scheme, in the event that existing recruitment channels do not yield suitable candidates.

Scrutiny of Custody Issues and Data – current position

24. Within the City of London Police, custody data relating to detainees and Equality, Diversity and Inclusion (EDI) is scrutinised at the monthly Custody Management Meeting, which reports into a quarterly Custody Management Group, chaired by the Superintendent in Criminal Justice Services and attended by partners including the ICV Chair and Police Authority Compliance Lead.
25. It has recently been agreed that custody EDI data will also form part of the product reported into the quarterly EDI Strategic Board, chaired by the Commissioner. This will ensure data on areas such as juvenile detainees, strip searching, use of force, mental health and ethnicity is scrutinised at a strategic level outside of Criminal Justice Services for increased transparency and governance.
26. The Force historically provided an annual update to PAB on the custody of vulnerable persons, with the last report received in November 2019. This report ensured oversight by PAB of custody EDI data, the risks being managed by custody officers and staff and the work being undertaken to improve outcomes for vulnerable detainees.

27. As the Force does not routinely report to PAB on custody at present, it is proposed that the annual update is resumed, to contain an overview of custody issues and include management information and data on vulnerability, use of force and EDI.
28. The Police Authority Compliance Lead provides an annual report to PAB on the ICV Scheme and it is further proposed that an annual custody update is provided to coincide with this, ensuring a full picture of custody issues and performance is presented for scrutiny.

Custody Detention Scrutiny Panels (CDSPs) – current position

29. All ICV Schemes in the United Kingdom work within the framework provided by the Police and Criminal Evidence Act (1984) and the Home Office Code of Practice on Independent Custody Visiting.
30. Whilst a wide range of legislation encapsulates lawful activity and HMICFRS determines compliance and areas for improvement, few mechanisms, other than independent custody visiting schemes exist for the regular, independent review of detainee treatment of those in police detention.
31. More recently, several independent reviews such as the *Lammy Review*, *Angiolini Review* and the *Commission on Race and Ethnic Disparities (CRED)* have identified issues of disparity and inequality in the Criminal Justice System which has led to a trust deficit between communities and the police.
32. An Independent Advisory Panel on Deaths in Custody (IAPDC) report noted that 'PCCs should lead local scrutiny Panels and expand their focus to include the examination of data relating to custody performance. These Panels could focus on data relating to disproportionality, as well as mental health and substance misuse prevalence.'
33. At present, various independent scrutiny Panels have already been established by PCCs and Police Forces across England and Wales to understand and address many aspects of disproportionality within specific policing environments (e.g. City of London Police IASG), however there has been no consistent approach nationally to addressing disproportionality within detention profiles.
34. Following support for the concept of Custody Scrutiny Panels by the NPCC and APCC, optional guidance on Custody Detention Scrutiny Panels (CDSPs) was developed in accordance with the National Custody Strategy to continue to increase transparency, further professionalise and improve police custody performance.
35. This guidance provides suggestions on areas including governance, training, scope and panel membership, but in recognition of the differences between forces and existing scrutiny arrangements, it is a decision for individual PCCs

and Chief Constables on how this scrutiny would operate within their respective force areas.

36. Representatives from the City Police have attended national briefing sessions, where some of the questions and issues raised by forces were discussed. Those forces who have adopted CDSPs report a variety of approaches, with some relying on existing scrutiny arrangements such as ICVs and others recruiting more widely from community groups and the third sector.
37. The recruitment and maintenance of multiple scrutiny panels is an issue experienced nationally and as a result many forces have started small, concentrating on specific issues such as strip search and use of force, rather than reporting on a broad range of topics from the start.
38. Due to the City of London's unique demographic and the work currently ongoing to recruit new volunteers for our ICV Scheme and IASG, both under new Chairs, we propose that the City of London adopts a similar approach in the initial stages. Presentations on CDSPs have been delivered at both ICV and IASG meetings and there has been some interest from members on involvement in this scrutiny.
39. Custody Management have been invited to present sample data to the IASG meeting on 22nd May 2024 to give an insight into the type of areas a CDSP would be expected to scrutinise. As a small force, using a combination of interested IASG and ICV members to commence some independent custody scrutiny is proposed as an initial way forward, whilst membership of both groups is stabilised. As with other forces, this will provide a foundation on which a CDSP can develop and will avoid a delay in starting this process. This clearly has benefits for transparency and improving public trust and confidence in a critical area of policing which manages a wide range of vulnerabilities.

Conclusion

40. Police Custody is an area of policing which manages a wide range of vulnerabilities on a daily basis. During their time in custody, a detainee is often at their most vulnerable, with unfamiliar and often unwelcome processes and procedures taking place, either as part of the investigative process or for detainee, officer and staff safety. Issues such as detention of juveniles, strip searches and use of force are understandably of public interest and concern; it is therefore right that police custody should be open to scrutiny and that we support the mechanisms to do this, through the effectiveness of our ICV Scheme and reporting of custody EDI data through formal governance structures, both internally and externally. Additional public scrutiny through the instigation of CDSPs will further this ambition and help to increase transparency and public confidence in what can be a divisive area of policing.

Appendices

Appendix 1 – Home Office Code of Practice on Independent Custody Visiting

Appendix 2 – City of London Police Independent Custody Visitor Onboarding process



Home Office

Code of Practice on Independent Custody Visiting

March 2013

Introduction

1. This Code of Practice on independent custody visiting is issued in accordance with section 51 of the Police Reform Act 2002, as amended by section 117 of the Coroners and Justice Act 2009 and paragraph 299 of Schedule 16 to the Police Reform and Social Responsibility Act 2011. Local policing bodies and independent custody visitors (ICVs) shall have regard to the Code in carrying out their relevant functions. Throughout this Code, the term ‘police and crime commissioners’ includes the Mayor’s Office for Policing and Crime (MOPAC) (in respect of the Metropolitan Police Service) and the Court of Common Council of the City of London Corporation (in respect of the City of London Police).
2. Independent custody visiting is the well established system whereby volunteers attend police stations to check on the treatment of detainees and the conditions in which they are held and that their rights and entitlements are being observed. It offers protections and confidentiality to detainees and the police and reassurance to the community at large.
3. The Coroners and Justice Act 2009 extends independent custody visitors’ remit to terrorist suspects in detention. This Code of Practice has been amended to set out how this would operate in practice - given the differences between terrorist and non-terrorist investigations and statutory frameworks, there are differences in how independent custody visiting operates in relation to terrorist suspects in detention.
4. The Code is supported by more detailed National Standards, which expand on the relevant procedures and systems and set out established good practice.

Legislation

5. Section 51 of the Police Reform Act 2002 (as amended) requires Police and Crime Commissioners in England and Wales to make arrangements for detainees to be visited by ICVs. Such arrangements may make provision for access to detainees by ICVs, examination of records, inspection of detention facilities and provision of a Code of Practice.
6. Section 117 of the Coroners and Justice Act 2009 introduces two changes to legislation which are intended to strengthen the independent monitoring of the detention and treatment of suspected terrorist detainees. These two changes amend:
 - (a) Section 51 of the Police Reform Act 2002 to ensure that the arrangements made by PCCs for ICVs include a requirement that reports about visits made to suspected terrorist detainees are submitted to the Independent Reviewer of Terrorism Legislation (IRTL) as well as to the PCC. The amendments also allow ICVs to listen and view audio and video recordings of interviews with suspected terrorist detainees, subject to any restrictions on such access, which must be specified in this Code of Practice (please see paragraphs 66-72 for further information).
 - (b) Section 36 of the Terrorism Act 2006 (review of terrorism legislation) under which the IRTL is appointed and tasked with the annual review of the operation of the Terrorism Act 2000 (TACT) and the Terrorism Act 2006, Part 1. As amended, that provision states that the IRTL may in particular consider the treatment of terrorist suspects detained under a warrant of further detention under Schedule 8 to TACT.

7. While the provisions of the Police Reform Act 2002 cover only England and Wales, the remit of the IRTL covers the entire UK. Therefore, in this regard his remit to examine compliance with Schedule 8 and the relevant PACE (and PACE NI) Codes cover Great Britain and Northern Ireland and similarly to review the operation of equivalent terrorism legislation in Scotland. This Code of Practice applies to England and Wales only. However, in order for the IRTL to fulfil his duties under section 117, equivalent arrangements will be put in place in Northern Ireland and Scotland to ensure a consistent approach is taken throughout the UK.

Organisation and Infrastructure

8. Section 51(1) of the Police Reform Act 2002 places the responsibility for organising and overseeing the delivery of independent custody visiting with PCCs, in consultation with chief officers. PCCs must therefore ensure that they have in place robust and effective procedures for establishing and maintaining their independent custody visiting schemes, including the allocation of appropriate resources to this function.
9. Overall responsibility for the central administration of the scheme must be given to a nominated officer on the PCC staff, supported as necessary by other personnel and resources.
10. At police area level, groups or panels of volunteers must be organised to visit police stations in the area. Every group needs to have its own co-ordinator locally, supported by the PCC's staff. Paragraphs 23-24 below explain the arrangements for ICVs who are accredited to visit TACT detainees.

Recruitment and Conditions of Service

Organising Recruitment

11. PCCs are responsible for recruiting, selecting and appointing ICVs and must ensure these functions are adequately resourced.
12. Adequate numbers of suitably trained and accredited ICVs must be available at all times. Paragraphs 23-24 explain the arrangements for ICVs who are accredited to visit TACT detainees.

The Recruitment Process

13. Recruitment must be based on clear role descriptions, as well as person specifications setting out the qualities ICVs require to carry out their role effectively.
14. Recruitment must be open, non-discriminatory and well publicised.
15. All selections must be made on the basis of a standard application form with adjustments based on local circumstances.
16. No person shall be appointed as an ICV without an interview taking place. The selection panel must record the reasons for decisions about appointment or non-appointment. Any appointment must be made solely on merit. Any appointment is subject to vetting or security clearance for all custody visitors to an appropriate level as determined by the Home Office.

ICVs who visit TACT detainees must have Security Check (SC) level clearance and have undertaken the specific training provided for visiting TACT detainees (see paragraphs 37-38 for details of the training). Before renewing the appointment of an individual ICV, PCCs must ensure that appropriate vetting or security clearance remains valid until the end of the period of appointment (see paragraph 29 below).

17. All ICVs must be at least 18 years old and must be living or working within the police area, having been resident in the UK for at least 3 years prior to the date of application. ICVs accredited to visit TACT detainees will need to have completed the I training and is a condition of selection for this role. ICVs must have successfully completed 18 months of PACE custody visits before they can be considered for TACT detainee visits. Paragraphs 37-38 provide more detail on the training for these roles.

Who should be selected?

18. The PCC must seek to ensure that the overall panel of ICVs is representative of the local community and provides a suitable balance in terms of age, gender and ethnicity.
19. All reasonable adjustments, as defined in the Equality Act 2010, must be made to accommodate those with a disability. Where it is proposed to appoint as an ICV an individual who does not have English as their first language, but who is able to communicate effectively so as to be understood, and is otherwise considered to be a suitable candidate, he/she must be informed that visits with detainees are carried out in English as is all documentation relating to detainees.
20. Visitors must be independent persons who are able to make informed and justified judgements and unbiased observations in which the community can have confidence and which the police will accept as fair criticism.
21. Where an applicant has one or more convictions for criminal offences, or has received any formal caution, warning or reprimand, or has failed to disclose any such finding, the specific circumstances must be considered in assessing suitability to become an ICV. However, past offending is not an automatic barrier to acceptance. The chief officer should provide advice to enable the PCC to make a decision with regard to the suitability of each applicant. The PCC should be informed by the chief officer as to the reason(s) for recommending that a volunteer should not be appointed. Ultimately, the PCC is responsible for all appointments of ICVs – subject to meeting the requirements (for example vetting) set out in this guidance.
22. In appointing ICVs, care must be taken to avoid any potential conflict of interest. For example, serving police officers and other serving members of police or PCC staff will be unsuitable for that reason. The same will apply to special constables, justices of the peace, members of police and crime panels or PCCs. All applications must be considered on their merit.

ICVs visiting TACT detainees

23. The selection of ICVs for TACT detainee visits will draw on the existing structures whereby ICVs are associated with schemes administered by individual PCCs and carry out visits only in that police area.
24. ICVs for TACT detainee visits will be drawn from those areas where terrorism detention takes place.

Other Possible Roles for Custody Visitors

25. ICVs may also act as appropriate adults. However, individuals must not switch between those roles during the course of a visit to the same police station and must declare if they have previously carried out either role with the same detainee. An individual cannot perform both roles (i.e. acting as an appropriate adult and an ICV) simultaneously for the same detainee.
26. ICVs may also act as lay observers appointed under section 81 of the Criminal Justice Act 1991 to inspect the conditions under which prisoners are transported and held.

Basis of Service

27. The PCC must provide each ICV with a written memorandum of understanding summarising their agreed responsibilities and the legitimate expectations of both parties.
28. The PCC must provide each ICV with an identity pass as their authority to visit any police station in the force area that is holding detainees on a regular or temporary basis.

Tenure

29. Appointments as an ICV must initially be for three years and must not be confirmed until a six-month probationary period has been satisfactorily completed. Full re-assessments of suitability must take place at regular intervals but no longer than three years apart. The key factors in renewing appointments for further periods must be the continuing ability and willingness of the individuals involved to do the job effectively. Any decision not to renew the appointment must follow the principles of natural justice and must be publicised in the scheme's memorandum of understanding or guidance. There are additional training and selection requirements for TACT ICVs as set out in paragraphs 37-38.

Removal

30. A PCC can terminate an ICV's appointment because of misconduct or poor performance.
31. Procedures for considering possible termination of appointment must follow the principles of natural justice and must be publicised.

Complaints Procedures

32. Procedures must be in place to deal with complaints against ICVs by detainees, police personnel or others. Equally, there must also be a clear mechanism for handling any complaints from visitors.

Payment

33. ICVs are entitled to be reimbursed for their legitimate expenses incurred in carrying out their role.

Insurance

34. The PCC must ensure adequate cover and provision for claims arising from an ICV's role.

Training

35. The basic responsibility for initial and ongoing training lies with the PCC and a structured plan with clear objectives must be developed in consultation with the police service and the local independent custody visiting community.
36. The PCC must evaluate the effectiveness of training and the extent to which it is achieving its objectives.

Training, selection and guidance for ICVs visiting TACT detainees

37. The Independent Custody Visiting Association (ICVA), with Home Office support, is responsible for developing and keeping under review an additional training package for ICVs visiting TACT detainees. Training will cover an explanation of the legal framework, review process, arrangements for visits, the role of the IRTL and how ICVs will work with the IRTL in carrying out their functions, and the conduct and reporting of visits.
38. Training for ICVs visiting suspected TACT detainees is part of the selection process, and successful completion of training is a condition of selection for this role. ICVs must have successfully completed eighteen months of PACE custody visits before they can be considered for TACT detainee visits. Selection, performance management and de-selection of ICVs is the responsibility of the relevant PCC.

Frequency and Coverage

39. The PCC should liaise with the chief officer about the frequency with which visits should be carried out.
40. Visits must be sufficiently regular to support the effectiveness of the system, but not so frequent as to interfere unreasonably with the work of the police.
41. The frequency of visits must be monitored against expectations and reported to the PCC at regular intervals. Where insufficient visits are taking place, the causes must be investigated and corrective action taken.
42. Consideration must be given to making visits to all police stations where detainees are held even where they are only accommodated for relatively short periods of time.

Visiting TACT detainees

43. In respect of PACE detention, ICVs regularly conduct unannounced visits to police stations. This element of “spot-checking” is an important tool in ensuring ICVs are able to provide an accurate “snapshot” account of detention conditions. Appropriately trained and security cleared ICVs may still undertake unannounced visits to terrorism detention suites, but given the low number of TACT arrests in comparison to PACE arrests, it is unlikely that a terrorist suspect will be in detention during visits which are conducted on an ad-hoc basis. For this reason, the relevant ICV scheme administrator will be notified when terrorist arrests take place and where those arrested are being detained.
44. This notification will be made by the police custody officer as soon as practicable after the detainee has arrived at the detention suite.

45. The ICV scheme administrator will inform appropriately trained and security cleared ICVs that an individual has been arrested under TACT and of the detention facility at which they are, or will be, held.
46. One of the nominated ICVs will make contact with the police custody detention suite to inform them of their intention to visit. The selected pair of ICVs may visit unannounced but a police officer of at least Inspector rank may delay access until such a time as is practicable (as set out in Section 51(4)(a) of the Police Reform Act 2002 and in paragraphs 49 and 55 of this Code). The police will accommodate an initial visit as early as possible, although visits may need to be delayed where multiple arrests take place simultaneously in order to allow suspects to be “booked in”. This ensures that suspects are able to receive notice of their statutory rights, and to exercise their right to inform someone of their arrest and receive legal advice. The process also ensures that the police are able to collect any necessary physical evidence from a person for analysis (e.g. forensic samples, DNA profiles, fingerprints etc). However, ICVs should be able to conduct an initial visit as soon as is practicable after the detainee has arrived at the detention suite.
47. Pre-charge detention under TACT can continue up to a maximum of 14 days. Therefore, subsequent visits by appropriately trained ICVs may be appropriate but this will depend on the length of the detention. Subsequent visits may take place until the detainee is charged or released. As a matter of good practice, different pairs of ICVs should visit the same detainee in the same pre-charge detention period. The police cannot direct when ICVs should conduct their visits; ICVs can visit a detainee whenever they wish – subject to the detainee’s consent (see paragraphs 64 and 72).

Working arrangements

Conducting visits

48. To ensure the safety and wellbeing of volunteers, visits must be undertaken by pairs of ICVs working together.

Visiting Procedures at Stations

49. ICVs must be admitted to the custody area immediately. Delay is only permitted when immediate access may place the visitors or another individual within the custody area in danger. A full explanation must be given to the visitors as to why access is being delayed and that explanation must be recorded by the visitors in their report.
50. ICVs must have access to all parts of the custody area and to associated facilities, such as cell accommodation, washing and toilet facilities, facilities for the provision of food and medical rooms (which in some cases, may only be accessible when the force’s healthcare practitioner is present) for the purposes of inspection. However, it is not part of their role to attend police interviews with detainees. Custody visitors will be allowed access to CCTV cameras and systems (in PACE detention facilities) to ensure that they are operational.
51. Police staff must be alert to any specific health or safety risks ICVs might face and must advise them appropriately at the commencement of the visit.
52. The custody officer or a member of custody staff must accompany ICVs during visits (subject to paragraph 58).

Access to Detainees

53. Subject to the exceptions referred to in paragraph 55, ICVs must be allowed access to any person detained at the police station. However, only ICVs who have undergone the appropriate security vetting and training will be permitted access to TACT detainees, irrespective of where they are being held. Detainees may only be interviewed with their consent which will be established either by:
- i) self-introduction – the ICVs will introduce themselves and their purpose and seek permission to speak to the detainee
 - ii) the escorting officer explaining the purpose of the ICV visit and asking the detainee whether they are willing to speak with the visitors.
54. Juveniles may be spoken to with their own consent. If, for whatever reason, a detainee is not in a position to give consent, the escorting officer must allow the visit unless any of the circumstances set out in paragraph 55 apply.
55. In accordance with section 51(4) of the Police Reform Act 2002, the custody officer may limit or deny ICVs access to a specific detainee only if authorised by an officer of, or above, the rank of Inspector and where either of the following specified grounds apply:
- i) after a risk assessment has been carried out the officer reasonably believes that to be necessary for the visitors' safety, or
 - ii) if the officer reasonably believes that such access could interfere with the process of justice.
56. Where any of the circumstances referred to in paragraph 55 apply, consideration should be given to allowing the visitors some limited form of access to the detainee, such as speaking through the cell hatch or seeking consent to view the custody record. Such a delay under the specified ground at paragraph 55 would not prevent the ICVs from inspecting the rest of the detention facility.
57. Any decision to deny or limit access must be recorded in the detainee's custody record (together with the relevant authorisation) and by the ICVs in their report of the visit.

Discussions with Detainees

58. Discussions between detainees and ICVs must, wherever practicable, take place in the sight, but out of the hearing, of the escorting police officer. Where this is not possible, the police officer will not take any active part in the conversation. Police officers should not actively listen to conversations between ICVs and detainees. For TACT detainees, discussions may take place in either the interview room, the solicitor's consulting room or some other convenient place.
59. Discussions must focus on checking whether detainees have been offered their rights and entitlements under PACE, their health and wellbeing, and the relevant safer detention guidelines and confirming whether the conditions of detention are adequate.
60. ICVs must remain impartial and must not seek to involve themselves in any way in the process of investigation. If a detainee seeks to make admissions or otherwise discuss an alleged offence, the visitor must tell them that the relevant contents of the visit will be made known to the custody officer and may be disclosed in legal proceedings.

61. If an ICV realises they know or are known by a detainee, they must declare this and consider whether to withdraw from the visit.
62. ICVs must not pass messages to or from detainees or offer to perform other tasks on their behalf. If they are asked to do so they must immediately inform the custody officer.
63. If a detainee indicates to an ICV that they may harm themselves or any other person, this must immediately be brought to the attention of custody staff.
64. Subject to obtaining the detainee's consent to examine their custody record, the ICVs should check its contents against what they have been told by the detainee. This will provide ICVs with an overview as to how the detention has been carried out. ICVs may also have access to other relevant documentation, which relates to a detainee e.g. risk assessment. All such information must be treated confidentially.
65. If a detainee is for any reason incapable of deciding whether to allow access to their custody record, the presumption must be in favour of allowing the ICVs to examine it.

Audio and video recording of TACT interviews

66. ICVs visiting TACT detainees may request that they are given access to audio or video recordings of interviews. ICVs may only request access to the whole or part of the audio or video recordings of any interview that has been conducted during the period of detention:
 - a) at the request of the detainee; or
 - b) where the ICVs have particular concerns about the conduct of an interview (the consent of the detainee will still be required).

Such a request will only be in order to:

- a) ensure that the detainee has been offered their rights and entitlements under TACT;
 - b) that their health and wellbeing has been ensured throughout; and
 - c) that the relevant statutory code of practice has been followed .
67. Given the interests of the detainee will be protected by their legal representative and, if relevant, an appropriate adult, during the interview, the ICV will not routinely need to access audio or video recordings of TACT interviews. Should the ICV continue to have concerns after viewing the recording, they should take this up as soon as possible with the custody officer in order to seek a resolution and follow the complaints procedures set out in the PCC arrangements.
 68. Access to the whole or part of an audio or video recording of an interview may only be denied to ICVs if:
 - (a) it appears to an officer of, or above, the rank of inspector that there are grounds for denying access (as set out in paragraph 69) at the time it is requested; and
 - (b) the procedural requirements imposed by the arrangements in relation to a denial of access to such recordings are complied with.

69. The only permitted grounds for denying access to the whole or part of an audio or video recording of an interview under paragraph 68 (a) above are:
- a) if the officer reasonably believes that it is not practicable to provide access at the time it is requested; or
 - b) if the officer reasonably believes that such access could interfere with the process of justice.
70. In the case of access being denied to audio or video recordings, an explanation must be given to the ICVs and this must be recorded on both the visit report form and the custody record.
71. ICVs will not be permitted to watch or attend live interviews of terrorist suspects.
72. ICV access to audio or video recordings of interviews must always be subject to obtaining the consent of the detainee. Consent will need to be obtained at each separate visit.

Medical Issues

73. ICVs have no right to see the detainee's medical records, even where these are attached to the custody record. However, key points relevant to medical treatment required while in custody should be recorded in the custody record itself and may be viewed.

Dealing with Issues and Complaints

74. Where a detainee makes a complaint or raises an issue about their general treatment or conditions, ICVs must (subject to the detainee's consent) take this up as soon as possible with the custody officer in order to seek a resolution. The same applies to similar issues identified by visitors in the course of their attendance.
75. If a detainee makes a complaint of misconduct by a specific police officer, they must be advised to address it to the duty officer in charge of the police station.

Effective Working Relationships

76. For independent custody visiting to be effective, it is essential that visitors and police staff develop and maintain professional working relationships based on mutual respect and understanding of each others' legitimate roles.

Reporting on a Visit

77. At the end of each visit, and while they are still at the police station, ICVs must complete a report of their findings to include conditions and facilities, rights and entitlements and health and well being. One copy of the report must remain at the station for the attention of the officer in charge. Copies must go to the PCC and other parties as determined locally.
78. Report forms must include an undertaking not to reveal the names of persons visited or other confidential information obtained in the course of a visit.

TACT detainees

79. Reports of visits should be submitted to the IRTL and to the PCC for both the police station where the suspect was held and also the police area in which the arrest was made. Co-ordination of reports will be done via the PCC and the ICV Scheme Administrator.

Feedback

80. Systems must be in place to ensure that the output from visits is drawn rapidly to the attention of those in a position to make the appropriate response.

81. The PCC is responsible for drawing together issues and identifying trends emerging from visits in their area and addressing these with relevant police supervisors.

82. The PCC must have a regular and formal opportunity to raise concerns and issues with a designated senior officer with force-wide responsibilities. It will usually be appropriate for that officer to be of at least Assistant Chief Constable/Commander rank. Regular reports shall be provided by the administrator of the scheme to the PCC. These reports must be discussed at PCC meetings as appropriate and reflected in an entry about independent custody visiting in the PCC's own annual report.

83. In addition, for TACT detainees the IRTL may choose to follow up issues separately.

Sharing Experience

84. The PCC must ensure that ICVs have regular opportunities to meet together to discuss their work.

Reviewing Performance

85. PCCs must take steps to assess how effectively their independent custody visiting arrangements are working. Key aspects of that process will be having regard to the National Standards, including quality assurance in respect of reports, remedial actions taken by the police in response to issues raised, the frequency with which visits take place and the number of occasions on which detainees refuse to speak to visitors.

Home Office

CoLP On-Boarding Process for Independent Custody Visitor Scheme

Onboarding

1. The Police Authority Team, as the Hiring Manager, will provide HR with the names of the Independent Custody Visitor (ICV) candidates via the CoLP HR Services Mailbox.
2. HR will initiate the volunteers onboarding process and forms for Vetting are sent to candidates (as well as the vetting information sheet) to enable the candidate to be officially logged onto CoLP systems.
3. On receiving the requested documents and photo ID from the candidate and relevant checks being completed, HR will update the candidate profile and send the candidate details and vetting documents to the CoLP Vetting Unit.
4. The Vetting Unit will vet each ICV candidate to NPPV2/CTC. A second vetting link will be provided by the Vetting Unit if the first expires. A third and final link will only be issued in exceptional circumstances. Thereafter, the vetting application will be closed and no longer progressed. The Vetting Unit will update the applicant's file on CoreVet to this effect and inform HR Services so that the Hiring Manager is informed.
5. Communication with the Vetting Unit will primarily be via email for record-keeping and audit purposes. It is the responsibility of the Police Authority Team to ensure that a valid email address is provided. It is the responsibility of the candidate to ensure that their various email folders (including Junk) are checked for communications from the Vetting Unit.
6. Any candidates who fail vetting are written to by the Vetting Unit informing them as such as well as provided information about appealing the decision. The Vetting Unit will inform HR of any refusal, and it is HR who record this and notify the Police Authority Team.
7. The Vetting Unit will inform HR of those candidates who have achieved vetting clearance. HR will inform the Police Authority Team of this (as the Hiring Manager), in addition to notifying Information Management Services (IMS).
8. On receipt of information from HR confirming that vetting clearance has been achieved, IMS will issue valid passes for the ICV volunteer. It is the responsibility of the Police Authority Team to arrange for the collection and distribution of these passes to their members.
9. The personal data of the ICV candidates will be processed and stored in line with relevant legislation and authorised professional practice.

On-going Maintenance

1. The Vetting Unit will issue the annual Security Appraisal Form (SAF1) to the ICV candidate, in line with policy. The candidate is expected to complete this.
2. As the Hiring Manager, the Police Authority Team will receive the SAF2 for their completion. This process enables periodic monitoring and review, helping to safeguard CoLP systems, data and estates from individuals who present conduct or security concerns.
3. On receipt of the completed SAF forms (1 and 2), the Vetting Unit will review them and take action deemed appropriate, which could include initiating a re-vet process and/or suspending vetting clearance.

Offboarding ICVs

If an ICV leaves the scheme either through resignation or dismissal, the Hiring Manager must inform HR Services so that the respective databases can be updated (IMS, Vetting, HR) and property returned.

This differs from those instances where an ICV becomes 'in active' for a short period of time, such as through ill-health. In this instance, since it is an operational matter, the CoLP Custody Manager will inform IMS thereby allowing for appropriate safeguards to be put in place in relation to their pass.

At any point, if security or conduct concerns arise about an ICV, the Vetting Unit must be informed.

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Agenda Item 8

Committee(s): Professional Standards and Integrity Committee	Dated: 4 June 2024
Subject: Q4 Stop and Search and Use of Force 2023-24	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
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 71-24	For Information
Report author: Supt Bill Duffy & Chief Inspector Paul Doyle, 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 have seen a continued decline with Section 60 and juvenile searches.

Of the 597 stop/searches in the Q4 period, 74 were dip sampled at a rate of 12.4%, experiential learning and feedback is given to officers where appropriate. This is within the target range of 10-15% dip sampling. There are 4 live ongoing formal complaints under investigation (3 for Stop and Search and 1 for Use of Force) 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 Q3 to Q4 has increased the success of positive outcomes from 34% to 43%. This also accounted for a period that saw disproportionality increase in both Black and Asian categories from 2 to 2.3 and 0.7 to 1.4 respectively. There is no immediate or obvious reason that can account for these increases but they are within the expected range. (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






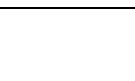

The University of East London project has been authorised and will provide academic and meaningful analysis of CoLP actions, Project parameters are still being established but initial reports will be expected late 2024.

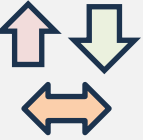








Recommendation

It is recommended that Members note the report.

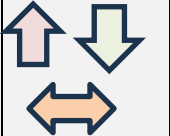

Stop and Search and Use of Force Data

- **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	597	-16 1.03%		Minor reduction in stop/search but policing was centred around public order as well as acquisitive crime with a number of proactive operations
Arrest from stop search	188	12 6.8%		Minor increase, not a significant effect on this data set
Searches under s.60	0	-2 N/A%		This reflects the lack of Section 60s within the City area
Juveniles searched	41	-19 31.7%		Another significant reduction in youth search, reflective of more term time
Black disproportionality	2.3	0.3 15%		
Asian disproportionality	1.4	+0.7 100%		
Total items found	280	+36 18%		An increase in the number of items found as a result of stop search

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend 	Comment (if appropriate)
Strip searches ² total	7	5 250%		
Strip search-More thorough	0	-8 N/A%		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	196 29%		Increase in the Use of force in this period. No single determining factor, more proactive crime operations though
Juvenile use of force	40	+24 250%		As above, this increase is not however reflected in the figures for stop search
Uses of force arrests	336	106 46%		Closer supervision has potentially caught up with the data lag, this may also be true for other use of force stats.
Uses of taser	22	+17		There is currently no clear reason for this increase though it is a return to Q2 figures.

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)
Taser discharges	0	0		
Live complaints relating to stop/search	3	+3		
Live complaints relating to use of force	1	-2		

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.

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).

Agenda Item 9

Committee(s): Professional Standards and Integrity Committee	Dated: 4 June 2024
Subject: Q4 Action Fraud Complaints and dissatisfaction 2023-24	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
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 72-24	For Information
Report author: D/Supt Carly Humphreys, PSD; PC Ann Roberts, PSD	

Summary

At your 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.

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 4 2023- 24 is attached for information.

Recommendation(s)

Members are asked to note the report.

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Summary of Action Fraud public complaints data– Q4 2023/24				
Metric	Current quarter (Q4)	Previous quarter (Q3)	(%) change (Q on Q)	Comment
Complaints – Schedule 3	1	1	0%	A total of 105 cases were logged in Q4 2023/24. This is an overall increase of 22 cases from Q3 2023/24 (27%) The average number of cases logged over the previous 5 quarters is 106 per quarter, Q4 is just 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	104	82	27%	
Allegations	240	48	400%	There were 240* allegations recorded in Q4 2023/24. This is an increase of 192 allegations from Q3 2023/24 (400%). The average number of allegations over the previous 5 quarters is 105 per quarter. Q4 is above average. *Previous quarters allegations have not been logged at the same time as the complaint. The year end Q4 has addressed allegations from previous quarterly cases. Most cases have one allegation relating to AF matters.
Average time to log complaints (days)	N/A	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	26		
Complaints finalised – Schedule 3	33	5	560%	
Complaints finalised - not Schedule 3	80	43	86%	
Average time to finalise complaint cases (days) – Schedule 3	Case combined data average 178 days	97	n/a	<i>Timeliness is taken from IOPC published bulletins and available retrospectively.</i>
Average time to finalise complaint cases (days) – not Schedule 3		75	n/a	<i>Case combined data average 178 days (ex subjudice). YTD. IOPC bulletin will publish breakdown by case type logged.</i>
Applications for review sent to local policing body	0	0		None recorded during Q4
Applications for review sent to IOPC	0	0		None recorded during Q4

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

Nature of allegations – Of the 240 allegations recorded during Q4 2023/24 the highest number was in the category of, A1 – Police action following contact (191) followed by A3 – Information (29) and A4 - General level of Service (22). 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 Q3 of 192 (400%). The AF admin team have been rectifying the year end data with adding allegations to previous quarter logged cases. The allegation date is added into the database within the quarter so not a true reflection of Q4 allegations. Cases generally have one allegation when related to Action Fraud complaints.

The 2023/24 yearly data shows 394 cases logged and 384 allegations recorded relating to Action Fraud. (see graph to show case/allegation recording differential).

Members of Parliament -

There have been 87 miscellaneous cases logged where MPs have made contact with PSD on behalf of a constituent. This is much higher than the previous quarter.

Action Fraud –

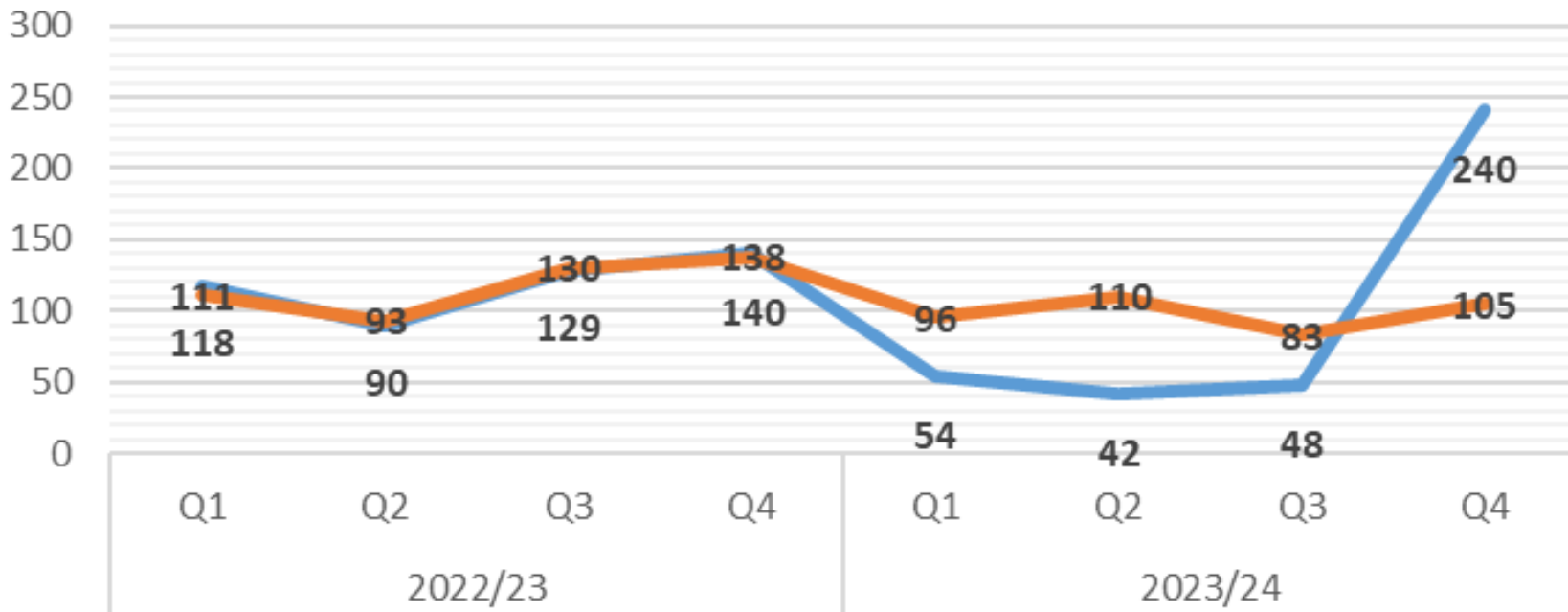
In QTR 4 of the 2023/24 Financial Year Action Fraud recorded 143,418 reports on the National Fraud Database (94,016 crime reports and 49,402 Information reports).

The complaint figures (total) represent 0.07% of the total number of Action Fraud reports recorded in Q4.

(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).

Action Fraud complaint data

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



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Committee(s): Professional Standards and Integrity Committee Police Authority Board	Dated: 4 June 2024 5 June 2024
Subject: Annual Review of Police Complaints Activity – 2022/23	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	Diverse engaged communities; dynamic economic growth; vibrant thriving destination
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: Town Clerk	For Information
Report author: Rachael Waldron, Police Authority Compliance Lead, Town Clerks in consultation with Det Supt Carly Humphreys / PC Ann Roberts, Professional Standards Directorate	

Summary

This report provides an overview of complaints and allegations made about the City of London Police and the Action Fraud reporting service in 2022/23. There is a statutory requirement on specified local policing bodies to publish quarterly Independent Office for Police Conduct (IOPC) complaints data relating to their force, and the relevant IOPC annual statistics report (the most up to date being for 2022/23). Local policing bodies are also required to publish a narrative setting out how they are holding the relevant chief officer to account and an assessment of their own performance in carrying out their complaints handling functions. They are required to publish this information in a prominent place on their websites. The attached report, at Appendix 1, has been drafted with those obligations in mind.

Recommendations

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

Main report

Background

1. The Policing and Crime Act 2017 and supporting regulations made significant changes to the police complaints and disciplinary systems, which were designed to achieve a straightforward, more proportionate, and customer-

focused complaints system, focused on learning and improvement. These changes were implemented on 1 February 2020.

2. Reports of dissatisfaction, with the City of London Police are logged and assessed in line with Schedule 3 of the Police Reform Act 2002 and the Independent Office for Police Conduct (IOPC) Statutory Guidance 2020, with the City of London Police and the Police Authority (as the Local Policing Body for the City of London Police) responsible for handling the majority of complaints themselves.
3. The initial assessment and handling of complaints is undertaken by the City of London Police and can result in number of outcomes:
4. **Non-Schedule 3 or early service recovery.** The Professional Standards Directorate (PSD) of the City Police will make early contact with the complainant to understand their concerns and their dissatisfaction and, where the nature of their dissatisfaction allows, will try to resolve it to their satisfaction. This avoids a lengthier process of investigation and can provide a complainant with an early resolution, explanation or other satisfactory outcome. If at the end of this process, it cannot be resolved it may be dealt with as a formal complaint within Schedule 3.
5. **Schedule 3 Recorded** – IOPC Statutory Guidance stipulates where complaints must be recorded and those that must be investigated; these include the more serious matters. Complaints which do not require an investigation will be handled in a *reasonable and proportionate* manner to try to achieve an earlier resolution to the complainant's satisfaction, while others will be investigated formally. At the end of this process if the complainant remains dissatisfied with the outcome of the complaint they have a right of review by either the Local Policing Body or the IOPC, depending on the seriousness of the allegation.
6. **Referral to Independent Office for Police Conduct** – some complaints will be referred to the IOPC and they may decide to independently investigate or oversee a police investigation. The IOPC also monitor our complaints system. IOPC data covers these outcomes.

Report for 2022/23

7. The report sets out complaints data for 2022/23 (which is already in the public domain on the IOPC website), a description of how the City of London Police Commissioner is held to account in terms of complaints, and an account of the Police Authority's own performance in terms of its responsibility to undertake complaints reviews. It also contains an explanation of how learning from the complaints processes is being embedded in the City Police.
8. For the City of London Police, IOPC data also includes complaints made about the national Action Fraud reporting service. The City of London Police Force received 594 complaints in 2022/23, of which 167 were about the local force and 427 were about the Action Fraud Service. This is broadly comparable to the position in 2021/22 (588 complaints, of which 137 were about the local force

and 451 were about Action Fraud). The complaints in 2022/23 contained a total of 666 allegations (a reduction of 2% compared to 2021/2022).

9. In terms of data capture, it should be noted that a complaint may contain multiple allegations, each of which can relate to the City of London Police as an organisation or concern one or more individuals. These can be updated during the handling of the complaint if additional factors become apparent.
10. In terms of complaint reviews, review panels formed under the auspices of the Professional Standards and Integrity Committee met on three occasions during 2022/23 to consider four cases. The average number of days taken to make determinations in these cases was 200 days (it was 197 days in 2021/22).
11. The commonest complaints, accounting for 537 (90%) of cases concerned delivery of duties and service, often relating to dissatisfaction around lack of updates or delays in responses, rather than concerns around police misconduct. Consequently the Professional Standards Directorate have introduced a number of processes to improve the efficiency, timeliness and quality of outcomes provided to complainants.

Improvements

12. The commonest complaints, accounting for 537 (90%) of cases concerned delivery of duties and service, often relating to dissatisfaction around lack of updates or delays in responses, rather than concerns around police misconduct. Consequently the Professional Standards Directorate have introduced a number of processes to improve the efficiency, timeliness and quality of outcomes provided to complainants.
13. **Early service recovery:** In addition to the early service recovery now provided to complainants via the Professional Standards Office Manager, and wider Professional Standards Directorate Complaints Team, many complaints are being allocated directly to accountable Inspectors and Sergeants for resolution, to ensure proportionate responses are supplied with appropriate explanations and apologies to complainants.
14. **Development of Template Letters:** Complainant template letters have been further developed for use to ensure they remain fit for purpose and clearly sets out the rationale supporting decision making, no further action outcomes and signposting to alternative agencies outside the police complaints system where appropriate; who may be able to provide further assistance (I.e. Citizens advice, Ombudsman schemes and alternative professional services). This has helped to improve complainants understanding of the police complaints system overall.

15. **Scrutiny by the Police Authority:** Further work has also been undertaken by the Police Authority's Policy Officer to lead on the work and scrutiny functions provided by the Professional Standards and Integrity Committee.
16. **Monthly Review Panels by the PSI Committee:** In order to ensure that a timelier response can be provided to complainants following Review requests, the Police Authority's Compliance Lead has set monthly Review Panel dates for Members of the Professional Standards and Integrity Committee to meet and consider cases.
17. **Upskilling of Compliance Lead Role:** The Police Authority has continued to carry through a previous commitment to upskill the Compliance Lead (as part of their continual professional development training), which has included attendance to Statutory Workshops facilitated by the Independent Office for Police Conduct (IOPC); allowing for improved engagement opportunities with complainants and better quality Review outcomes of complex cases.
18. It is anticipated that complaints will continue to be progressed in a timely manner considering these changes.

Rachael Waldron

Police Authority Compliance Lead

Appendices

- Appendix 1 – Annual Review of Police Complaints Activity 2022/23; Glossary of terms; IOPC Annual Complaints Data Statistics

City of London Police – Complaints 2022/23

Introduction

This is an annual report of complaints and allegations made about the City of London Police and its national Action Fraud reporting service in 2022/23. Legislation¹ requires local policing bodies to publish the most recent Independent Office for Police Conduct (IOPC) quarterly complaints data for their force and the IOPC annual statistics report², alongside a narrative setting out how it is holding the chief officer to account, and its assessment of its own performance in carrying out its complaints handling functions.

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

2022/23 complaints data – At a glance

The City of London Police received **594 complaints** in 2022/23, of which **167** were about the local force and **427** were about the Action Fraud service*. These complaints contained a total of **666 allegations****.

The average time to log a complaint was **21 days** and the average time taken to contact a complainant was **17 days**. On average it took **50 days** to finalise cases falling outside of Schedule 3***, and **77 days** to finalise Schedule 3 cases.

The commonest complaints – accounting for 537 (90%) of cases – were about deliveries of duties and service. Of the 4 cases reviewed by the local policing body 4 were not upheld (meaning the policing body concluded the complaint had been handled appropriately) but recommended that additional measures were taken to remedy the dissatisfaction expressed by complainants.

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

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

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

City of London Police complaints 2022/23

Chart 1 visualises the total volume of complaints, allegations, and number of complainants in 2022/23 and their split between the local City of London police service and national Action Fraud reporting service. It shows that the majority (c.70%) relate to the latter.

¹ See [here](#)

² Available [include link to relevant data attached as Annex 'X't to the report]

Chart 1 – Total complaints Data

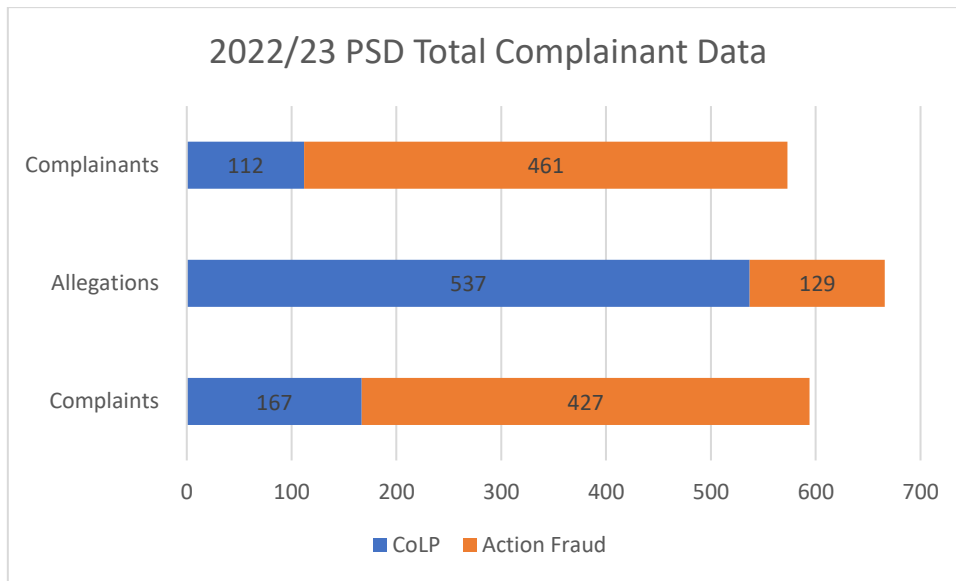


Chart 2 shows how many complaints against the local City of London police service were recorded under ‘Schedule 3’ in each quarter of 2022/23. ‘Schedule 3’ refers to complaints recorded and investigated in line with the Independent Office of Police Conduct’s statutory guidance. Some complaints may not require a detailed ‘Schedule 3’ enquiry to address, for example if someone wants explanation of an issue or to note a concern. In these cases a complaint is logged as ‘outside Schedule 3’. See Chapter 6 of [IOPC guidance](#) for full detail.

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

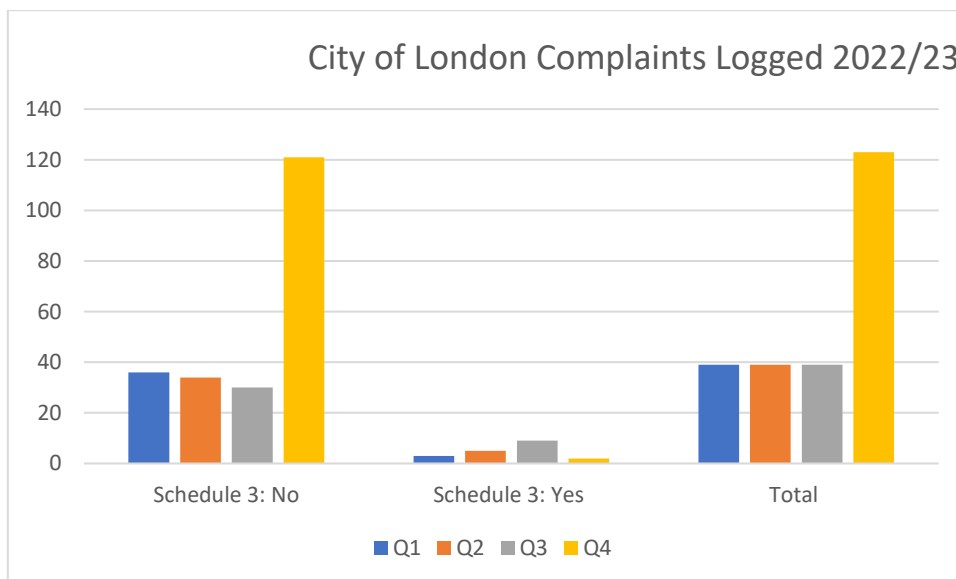


Chart 3 shows why complaints were recorded as ‘Schedule 3’ by the City of London police. IOPC guidance (see link for Chart 2) sets out that complaints must be logged under Schedule 3 if a) the nature of allegations meets certain criteria of seriousness,

b) if the chief officer or local policing body decides it is appropriate to do so, c) the complainant requests it be logged as such. A complaint initially not logged under Schedule 3 may then be if initial handling does not resolve it to the complainant's satisfaction.

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

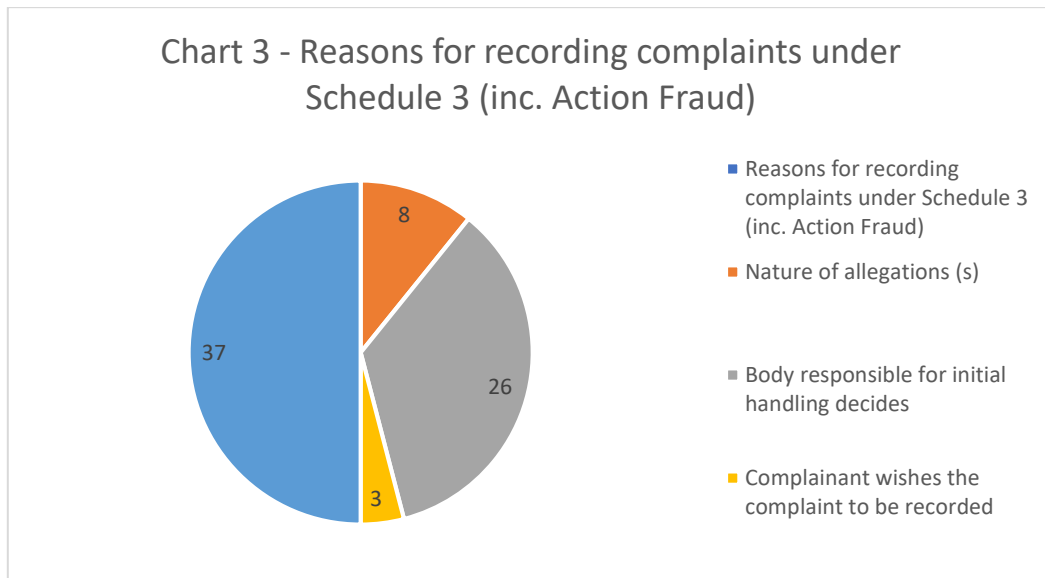
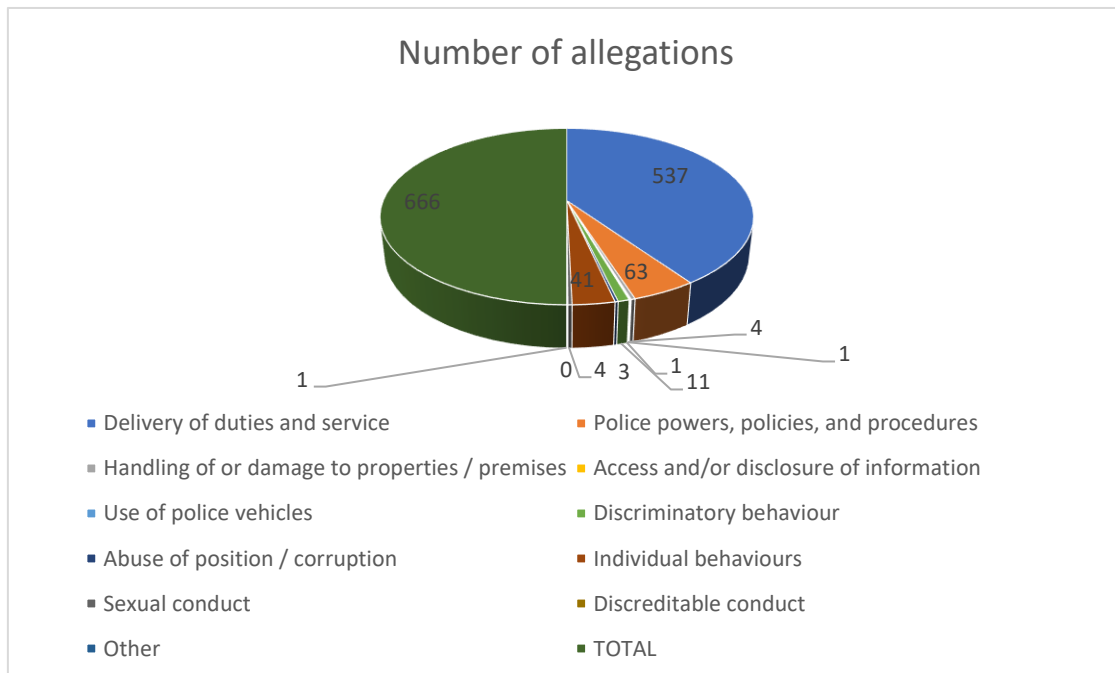


Chart 4 shows the breakdown of what types of allegations have been made against the City of London police. The following Table 1 shows the same information for additional clarity. **Chart 4 – Breakdown of allegations – what has been**

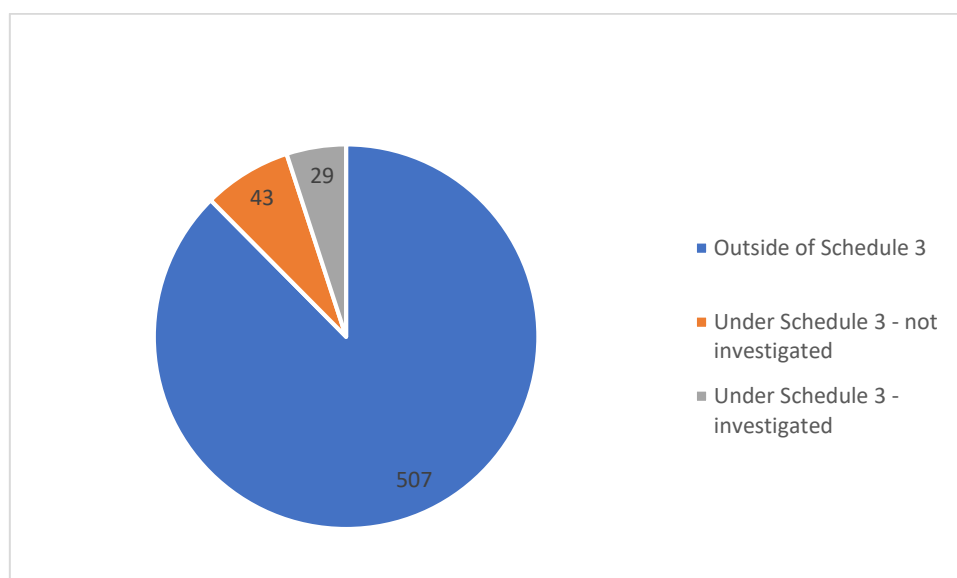


complained about (inc. Action Fraud)
Breakdown of allegations – what has been complained about in 2022/23

Table 1 – Breakdown of allegations - 2022/23	
Category	Number of allegations
Delivery of duties and service	537
Police powers, policies, and procedures	63
Handling of or damage to properties / premises	4
Access and/or disclosure of information	1
Use of police vehicles	1
Discriminatory behaviour	11
Abuse of position / corruption	3
Individual behaviours	41
Sexual conduct	4
Discreditable conduct	0
Other	1
TOTAL	666

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

Chart 5 – Means by which allegations were finalised

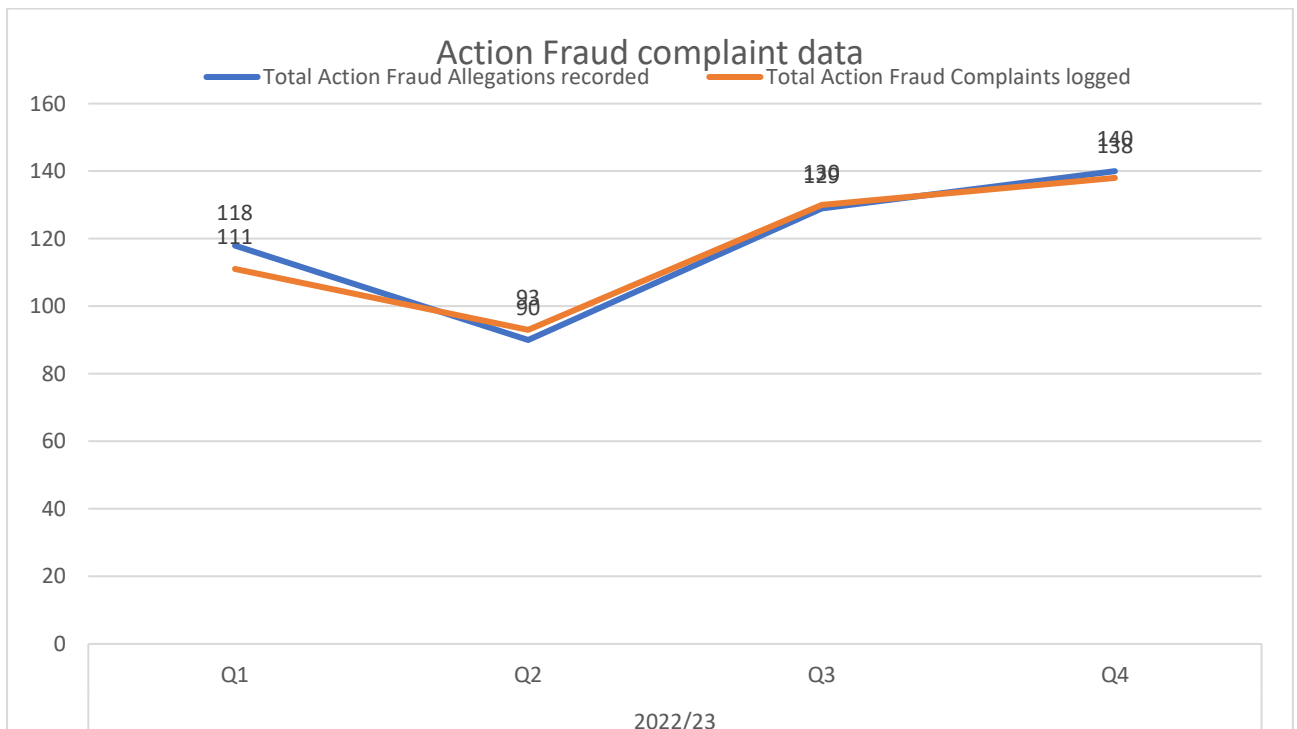


Sub-section on Action Fraud complaints

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

Complaints about Action Fraud are included in IOPC data on complaints about the City of London Police

This sub-section provides a brief breakdown of complaints about Action Fraud, using internal data.



As set out in Chart 1 above, 71% of complaints and allegations received by the City of London Police relate to Action Fraud.

Chart 6 shows the breakdown of 'Schedule 3' and 'non-Schedule 3' complaints about Action Fraud. Schedule 3' refers to complaints recorded and investigated in line with the Independent Office of Police Conduct's statutory guidance. Some complaints may not require a detailed 'Schedule 3' enquiry to address, for example if someone wants explanation of an issue or to note a concern. In these cases a complaint is logged as 'outside Schedule 3'. See Chapter 6 of [IOPC guidance](#) for full detail.

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

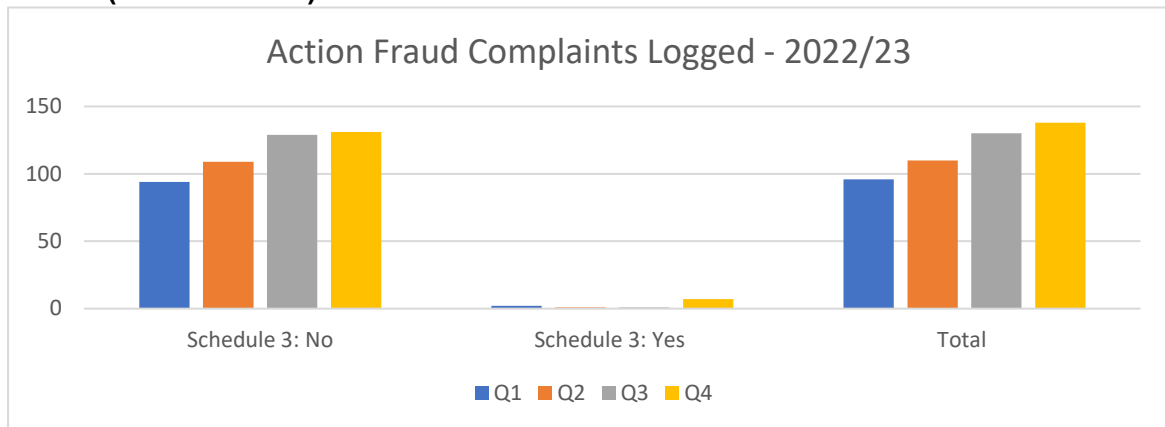
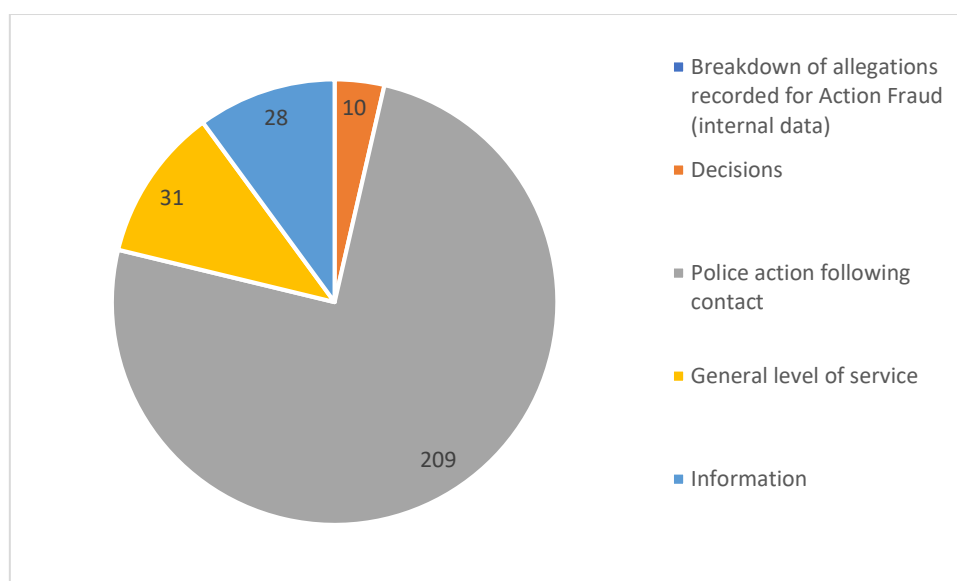


Chart 7 shows the breakdown of types of allegations received about Action Fraud.

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

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

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



The City of London Police is the National Lead Force within the UK for Economic Crime investigation and since April 2013, receives all reports of fraud reported across England and Wales through the 'Action Fraud' reporting process. Reports made to Action Fraud are passed to the National Fraud Intelligence Bureau (NFIB) for their assessment, and potential dissemination to local forces, for them to consider an investigation.

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

Most Action Fraud complaints are in relation to failure to investigate reports made to them. However, Action Fraud has no investigative responsibilities and complaints of this nature fall outside the remit of the police complaints system.

While the police complaints system is unable to be utilised by complainants to overturn a previous outcome decision to investigate a reported fraud, PSD has continued to provide detailed prevention advice to complainants, which ensures that complainants are supplied with details of relevant partners and appropriately routed to stakeholders that may be better placed to address their complaint and recovery of money lost. This has helped to ensure that complainants expectations about the service provided by Action Fraud can be appropriately managed.

It is expected that the new Action Fraud Service Replacement service will assist with generation of greater insights across fraudulent activity that can rapidly be shared to prevent victim impact at scale.

How the City of London Police Commissioner is held to account

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

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

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

During 2022/23, the PSI Committee received statistical updates on complaint cases and trends relating to (a) the nature of allegations in complaints, and (b) the means by which those allegations are resolved. The PSI Committee continues to perform a highly detailed scrutiny function to examine the casework of complaints logged by the City Police.

The PSI Committee has worked with the Detective Superintendent Professional Standards Department (PSD) of the City Police to ensure that the papers reviewed by Committee Members contain sufficient information to be able to assess whether an appropriate outcome was reached, while not unnecessarily revealing personal details of individuals involved or creating extra workload. In 2022/23, the Committee continued to look at matters of conduct; it received updates on all misconduct meetings and hearings which had been dealt with by the City Police.

The PSI Committee continues to support the City Police in ensuring themes identified in complaint or conduct cases are progressed as issues of organisational learning and embedded widely across the service. The PSD has also received an uplift of officers this year to address increases in both complaints and conduct matters. This growth will enable us to continue in providing a professional service to complainants.

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

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

They attended meetings of the Professional Standards Directorate Working Group in 2022/23, engaged in refresher workshops facilitated by the IOPC with other South East area Offices of Police and Crime Commissioners, and provided the Committee with a digest of highlighted areas/themes of learning at these meetings.

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

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

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

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

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

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

Reviews considered in 2022/23

During 2022/23, the complaints review panel met on three occasions to consider four cases. The breakdown of the cases was as follows:

Outcomes of reviews by Local Policing Body:	Upheld	Not Upheld
Reviews completed	0	4
Subject matter of cases		
Police Powers, policies and procedures		

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

In 2022/23, requests for reviews were acknowledged 28 days of receipt. The average number of days taken for the review panel to make determinations on cases during this period was 200 days.

Themes

Three main themes emerged from complaint reviews submitted to the City of London Police Authority in 2022/23, which mirrored those which emerged in the preceding year:

i) *Perceptions of an inadequate service provided by the City of London Police:*

This includes expressions of dissatisfaction from complainants across the initial handling of a complaint submitted (i.e., delayed engagement from the force to the complainant to discuss proportionate measures to resolve the matter reported). Complainants have often referred to a lack of '*basic scoping/assessment of the facts*' in relation to complaint dissatisfaction; suggesting that improved scoping exercises to establish the facts could have led to different complaint outcomes.

ii) *Greater acknowledgement of the emotional/financial impact of police decisions on complainants:*

Particularly across complaints that allege a disproportionate or unfair use of police powers, policies and procedures (i.e., police vehicle stops, use of force, stop and search, arrest and detention). Complainants have often described the personal impact encountered as a result of their experience with the complaints process; frequently highlighting how resource intensive it is to take a police complaint forward.

iii) *Seeking appropriate reassurance that learning emerges from dissatisfaction and leads to fewer repeat incidents* – complainants have often cited a lack of acknowledgement from the force, on 'what went wrong' (across the handling of their complaint) suggesting that the force were dismissive or demonstrated a reluctance to use their complaint as an opportunity to identify lessons or areas of improvement.

These themes have been feedback directly to the Professional Standards Directorate Complaints Team, Professional Standards Directorate Engagement Officer and Working Group

Collectively these teams have continued to work extensively across the force, to address poor service as learning and encouraged more consistent use of continuous professional development and reflective review practice (a non-disciplinary processes). This process has enabled officers and line management opportunities to better understand complainants concerns and dissatisfaction; and identify key solutions to prevent future reoccurrences.

Signposting by the Police Authority: Complainants have been reminded about the Police Authority's remit in relation to the complaints system (i.e. to determine whether a reasonable and proportionate outcome was provided in respect to the handling of their complaint). Where appropriate, the Police Authority signposts complainants to alternative professional bodies outside the police complaints system that may be able to provide further impartial advice across a wide range of matters, such as the Citizens Advice Bureau and the Financial Conduct Authority.

In addition, any dissatisfied complainant is advised on their legal right to seek judicial review via an application to the High Court. No such applications were made during 2022/23.

Conclusion

The complaints picture for the City of London Police in 2022/23 is broadly comparable than for 2021/22, with a small increase in the total number of complaints and a small drop in the number of allegations. There was an increase in the number of complaints about the City Police's local policing responsibilities in 2022/23, which may be linked to a widening in the definition of a complaint to '*any expression of dissatisfaction*' which has helped to improve accessibility of the complaints system. It may also be symptomatic of the national picture of questions about the public's trust and confidence in policing.

While Action Fraud continues to generate a greater volume of complaints than the City of London Police's local policing responsibilities, it continues to account for a very small proportion of the total volume of Action Fraud incidents reported. In Q4 of the 2022/23 financial year Action Fraud (AF) recorded 132,224 reports on the National Fraud Database consisting of 85,359 crime reports and 46,865 information reports. The complaint figures (total) represent 0.10% of the total number of Action Fraud reports recorded in Q4.

For the most part, the top 5 allegation categories have also remained fairly consistent across 2021-23. However, there are several proactive steps in train to reduce complaints in this area which include: a Professional Standards Directorate Working Group and Professionalism newsletter, *enhanced Stop and Search/Use of Force Training and broadening of CoLP's Inclusivity Programme* (i.e. Training on Mentivity, Unconscious Bias, Active Bystander); and monthly PSD briefings with directorate heads and engagement leads to communicate specific learning and feedback across teams.

It is notable however, that the average time taken to log complaints, contact complainants and finalise cases via methods outside investigative measures has increased in contrast, which may indicate that the force has taken further steps to address the root cause of complaint dissatisfaction. Particularly by widening scoping activity and allocating complaints to subject matter experts in force to ensure that complaints are dealt with proportionately and diligently.

It should be noted that the average time taken to finalise complaints inside Schedule 3, has also increased. This may indicate that complaints have become more complex to investigate, particularly in circumstances where dissatisfaction relates to the conduct of persons serving with the police; as multiple allegations can be contained within a single complaint.

Additionally, taken together with the IOPC's direction to build public confidence; and calls for more action to improve how complaints are handled by police forces following inquiries such The Baroness Casey Review and The Angiolini Inquiry, there have been notable increases in complaints nationally that indicate members of the public are increasingly willing to raise their concerns. It is likely that this pattern will

continue as police culture and broader concerns surrounding women's safety in public continue to be examined in forthcoming Parts of the Angiolini review.

The Authority recognises that continued improvements are required to deliver a more customer focused approach to complaint handling. This approach should be one that engages, prioritises listening and effectively resolves dissatisfaction in a timely manner.

Doing so will help to support the Police Authority with its ambitions to be an effective oversight body, that supports the delivery of the Police Authority Board's Policing Plan; and provides a complaints system that the public can have full confidence in.

To this extent further work has been undertaken to improve the timeliness of independent complaint reviews; and strengthen the way the Authority discharges its responsibilities in respect to complaint handling and management of misconduct proceedings.

It should be noted that Police Complaints training has been completed by wider members of the Police Authority Team, and to all Members of the Professional Standards and Integrity Committee, providing better overall resilience across the police complaints system.

Annex A: glossary of terms

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

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

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

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

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

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

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

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

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

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

Complaint recording

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

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

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

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

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

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

Investigations:

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

Investigation outcomes:

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

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

Reflective Practice Review Process:

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

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

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

Misconduct: A breach of the Standards of Professional Behaviour

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

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

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

Withdrawn: A complainant may decide to withdraw one or more allegations in their complaint or that they wish no further action

to be taken in relation to their allegation/ complaint. In this case, no further action may be taken with regard to the allegation/ complaint.

Police Terminology

AA: Appropriate Authority

ANPR: Automatic Number Plate Recognition

ATOC: (Association of Train Operating Companies) agreements.

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

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

BWV : Body Worn Video

CAD: Computer Aided Dispatch

CCJ: County Court Judgement

DPS: Directorate Professional Standards (Metropolitan Police Service)

DSI: Death or Serious Injury

ECD: Economic Crime Directorate

FI: Financial Investigator

HCP: Health Care Professionals

IOPC: Independent Office of Police Conduct

LP: Local Policing

MIT: Major Investigation Team

MPS: Metropolitan Police Service

NFA: No Further Action

NLF: National Lead Force

NUT: National Union of Teachers

PCO: Public Carriage Office

PHV: Private Hire Vehicle

PMS: Property Management System

PNC: Police National Computer

POCA: Proceeds of Crime Act

PRI: Practice Requiring Improvement

P&T: Professionalism and Trust

SAR: Subject Access Request

SAR: Suspicious Activity Report

SIO: Senior Investigating Officer

SOP: Standard Operating Procedure

SO: Specialist Operations

STOT: Safer Transport Operations Team

TFG: Tactical Firearms Group

TfL: Transport for London

TPH: Taxi and Private Hire

Table 1 sets out full detail of IOPC data on complaints and allegations against the City of London Police in 2022/23. It is presented alongside national averages but please note that City of London IOPC data includes complaints and allegations made about the Action Fraud reporting service, which means volumes and response times are not necessarily directly comparable. Please see the section on Action Fraud complaints below for further information.

Table 1 – City of London Police complaints data 2022/23		
Metric	CoLP Data*	National average
Number of complaints logged (of which Action Fraud)	594 (427)	81,142
Number of complaints logged per 1,000 employees	411	329
Number of allegations logged (of which Action Fraud)	666	134,952
Number of allegations logged per 1,000 employees	461	547
Average time taken to log complaint	21 days	5 days
Average time taken to contact complainant	17 days	5 days
Number of complaint cases finalised – outside Schedule 3	448	1096
Number of complaint cases finalised – inside Schedule 3	76	694
Average time taken to finalise complaint – outside Schedule 3	50 days	19 days
Average time taken to finalise complaint – inside Schedule 3	77 days	132 days
Applications for review received by IOPC – investigated	1	803
Applications for review received by IOPC – not investigated	2	1188
Number of allegations finalised by investigation under Section 3 – investigated (not subject to special procedures)	23	15536
Number of allegations finalised by investigation under Section 3 – investigated (subject to special procedures)	6	1562
Average time taken to finalise allegations – outside Schedule 3	25	16
Average time taken to finalise allegations – not investigated under Schedule 3	53	98
Average time taken to finalise allegations – by local investigation under Schedule 3	180	159
<i>*Note that figures for the City of London include complaints and allegations about Action Fraud. This means they are not directly comparable to other forces data.</i>		

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Committee(s): Professional Standards and Integrity Committee	Dated: 4 June 2024
Subject: Q4 Professional standards, conduct, and vetting Update 2023-24	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
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 73-24	For Information
Report author: D/Supt Humphreys/PC Ann Roberts Professional Standards Dept	

I. Summary

- Overall, the volume of Complaints has risen in comparison to Quarter 3, however the total number of allegations recorded within those complaints has decreased. There has also been an increase in the number of new Conduct Cases this Quarter with 15 cases, the majority have been assessed as Gross Misconduct. Since the last quarter, an additional two Detective Constables have been posted into the PSD investigation team on temporary attachment, which has assisted in alleviating some of this demand.
- 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. Similarly, there are a number of officers subject to long-term suspension as their misconduct cases are held sub-judice awaiting for results of long impending criminal investigations or trials.
- The new Police Dismissals changes have replaced the role of the Legally Qualified Chair, with a Chief Officer within the police force. However the requirements to have Independent Persons and Legally Qualified Persons as part of the new composition means that these challenges in securing panels are likely to continue.

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 fourth quarter of 2023/24 (Jan - March).

This quarter the total number of CoLP complaint cases logged is 53.

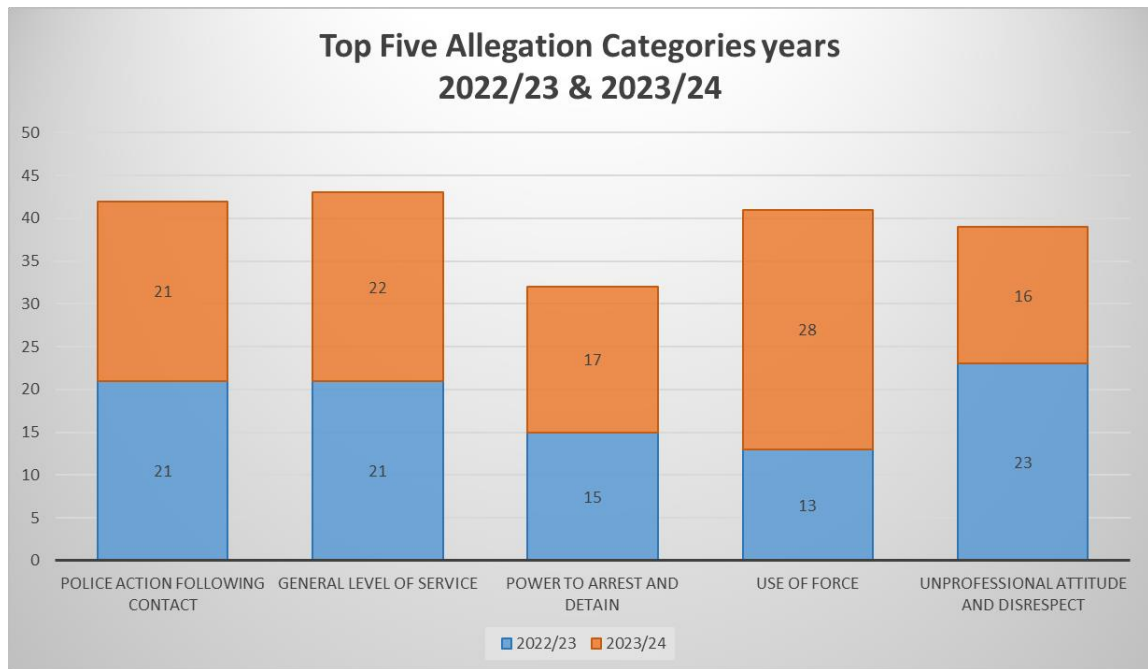
This is separated into 11 dealt with under Schedule 3 of the Police Reform Act 2002 and 42 not within Schedule 3. This figure of 53 complaints is an increase compared against Q3 where a total of 39 complaints were logged; 9 under Schedule 3, and 30 not within Schedule 3.

Of the 60 allegations recorded during Q4 2023/24 the highest number were in the category Impolite language / tone (8) Handling or/ damage to Property/premises (8) Police Action following contact (6) Impolite and intolerant actions (4)

This is a decrease in allegations recorded against Q3 of 8 (12%).

Allegation types 'Power to arrest and detain', and 'Use of Force' have featured each quarter over the last annual period, within the highest recorded types. And whilst 'Use of Force' does not feature in the top 5 of Q4, 1 allegation was recorded within this category. Indeed, the year-end data sees this as the highest allegation type, with 28 allegations overall which is a rise of 115% against the previous year's 'Use of Force' data. However, 'Use of Force' only accounted for 11% of the total allegation types for 2023/24. The allegation type 'General Level of Service' has also returned to the top five allegations, which feature in both the annual top 5 data 2022/23 and Q4.

Q4 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, the following areas were the highest allegation types: Handling of/or damage to property (8), Impolite language/tone (8), Police action following contact (6), Impolite and intolerant actions (4), and General level of Service (3).

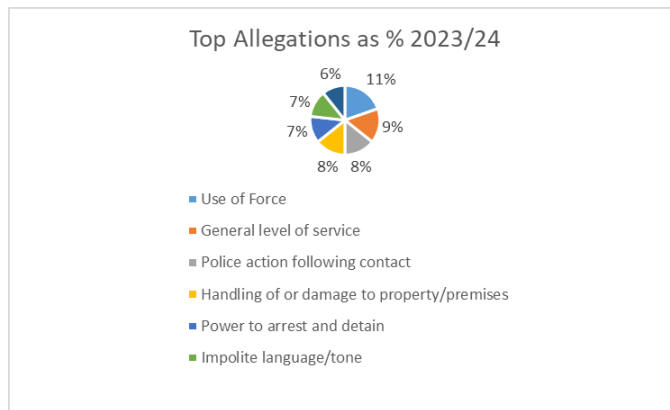


Q4 – Data examination: -

Analysis of the highest allegation categories (the latest Q4 is compared against both the previous quarter(s) and the total years (2023/24) and (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: Handling of or damage to property, recorded during Q4 identified the 8 allegations were within 8 cases. Of which, all were logged as non-schedule 3 (all have been finalised as Resolved). Complaints mainly related to the seizure and return of either phones or bicycles, resulting in two learning matters identified relating to the property store recording.

The allegation type of Impolite language or tone recorded during Q4 identified that the 8 allegations were within 8 cases (6 Non-Schedule 3 and 2 Schedule 3). All of the Non-Schedule 3 cases have been Resolved and the remaining 2 schedule 3 cases were deemed that the service provided was acceptable. There were no trends to the complaints logged or learning matters identified.

2023/24 data also shows an overall trend in the increase of complaint allegation type of 'Handling of property/premises'. Eight of these allegations were recorded in Q4. The third quarter of being in the highest allegation types. This increase may relate to the increased proactive patrolling involving bikes/phones that the complaints relate to.



The total number of allegations finalised during Q4 is 113 compared to 51 in the previous quarter. This performance improvement is due to the increase in resourcing within the investigation team which has provided more prompt resolutions for complainants and officers.

Of the 113 allegations finalised:

54 Resolved

31 Service provided was acceptable

13 No further action

9 Not resolved/No further action

3 Service provided was not acceptable

1 Case to answer

1 No Case to answer

1 Withdrawn

To note, cases often contain more than one allegation; the number of cases finalised in Q4 is 83, compared to 33 finalised in Q3.

Of the cases finalised 27 were logged as Schedule 3, and 56 were not under Schedule 3. There were no cases finalised under the previous regulations.

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

During this quarter, 15 new conduct investigations were recorded, and 5 were finalised. There are currently 44 live conduct investigations, of which 25 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 subject to lengthy investigation timescales. Newer conduct matters appear to be moving away from this allegation type and into Honesty and Integrity matters.

Five Conduct matters have been finalised: 1 case contained 'Reflective Practice' as an outcome, 2 cases resulted in 'No Case to Answer', 1 case was 'Case to Answer' and 1 case 'Discontinued'.

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

- Police Dismissals processes: On the 7th May 2024, new arrangements for Police Dismissals came into effect. Changes to disciplinary procedures now allow individual Chief Constables/Commissioners to have stronger decision-making powers regarding dismissals, with appropriate delegation to Assistant Chief Constable/Commander level as panel Chairs. City of London Commanders have received College of Policing training and these arrangements will affect cases being heard later this year. The City of London Police is working with the Police Authority Team to ensure that there is a common understanding of the changes and can work through any practical implications for both parties.

- Vetting: The importance of Vetting continues to increase with national significance, as seen through recommendations made within The Angiolini Inquiry Part One. Within PSD, (this is subject of a separate report on the agenda) we have more closely aligned our Vetting team to our Counter Corruption Unit and Investigation team in recognition that vetting is the 'first line of defence' against corruption and misconduct. This is further professionalising the quality and robustness of vetting standards in line with APP and the Vetting Code of Practice.

Although challenges of demand continue, since the previous reporting period, three additional Vetting Officers have joined the department which will assist in progressing vetting applications.

III. Forward look

- The Angiolini Inquiry Part One: On the 29th of February 2024 Part One of the Inquiry was published, this addressed how Sarah Everard's killer was able to serve as a police officer for so long and seek to establish a definitive account of his conduct. The inquiry noted 16 recommendations for forces and national stakeholders to implement. These recommendations have been accepted nationally by policing and other key stakeholders, however, will require some notable developments within recruitment, onboarding, vetting and wider Professional Standards functions across all forces.

A full report on these recommendations is provided to this Committee.

- Vetting Authorised Professional Practice (APP) – the consultation period for the new APP has ended. However, we anticipate a delay in the publication due to the impact of The Angiolini Inquiry Part One, meaning that a further iteration may be required. We will welcome the new APP as it will standardise the approach and decision making across force vetting units.

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.

Summary of public complaints data – Q4 2023/24					
Metric	Current quarter (Q4)	Previous quarter (Q3)	IOPC previous quarterly bulletin (Q2)	# (%) change (Q on Q)	Comment
Complaints – Schedule 3	11	9		22%	A total of 53 cases were logged in Q4 2023/24. This is an overall increase of 14 cases from Q3 2023/24 (36%)
Complaints – not Schedule 3	42	30		40%	The average number of cases logged over the previous 5 quarters is 40 per quarter, Q4 is above average.

Allegations	60	68		12%	There were 60 allegations recorded in Q4 2023/24. This is a decrease of 8 allegations from Q3 2023/24 (12%).
					The average number of allegations over the previous 5 quarters is 63 per quarter. Q4 is below average.
Average time to log complaints (days)	N/A	0	1	100%	<i>Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.</i>
Average time to contact complainant (days)	N/A	10	3	233%	
Complaints finalised – Schedule 3	27	9		200%	Increase PSD overt investigation staff
Complaints finalised - not Schedule 3	56	24		133%	

Average time to finalise complaint cases (days) – Schedule 3 (NOT including subjudice cases)	Case combined data average 103 days	186	140	33%	<i>Timeliness is taken from IOPC published bulletins and available retrospectively. This is YTD collective quarterly data. i.e. Q4 (when published) will be year end.</i>
Average time to finalise complaint cases (days) – not Schedule 3		76	69	10%	
Applications for review sent to local policing body	0	0	1	100%	None recorded during Q4
Applications for review sent to IOPC	0	2	2	0%	None recorded during Q4

Nature of allegations – Of the 60 allegations recorded during Q4 2023/24 the highest number were in the categories of Impolite language / tone (8) Handling or/or damage to Property/premises (8) Police Action following contact (6) Impolite and intolerant actions (4)

This is a decrease in allegations recorded against Q3 of 8 (12%).

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, neither of which feature in Q4. The top five allegation types at the end of 2023/24 are as follows:-

Use of Force 11%

General level of service 9%

Police action following contact 8%

Handling of or damage to property/premises 7%

Impolite language /tone 7%

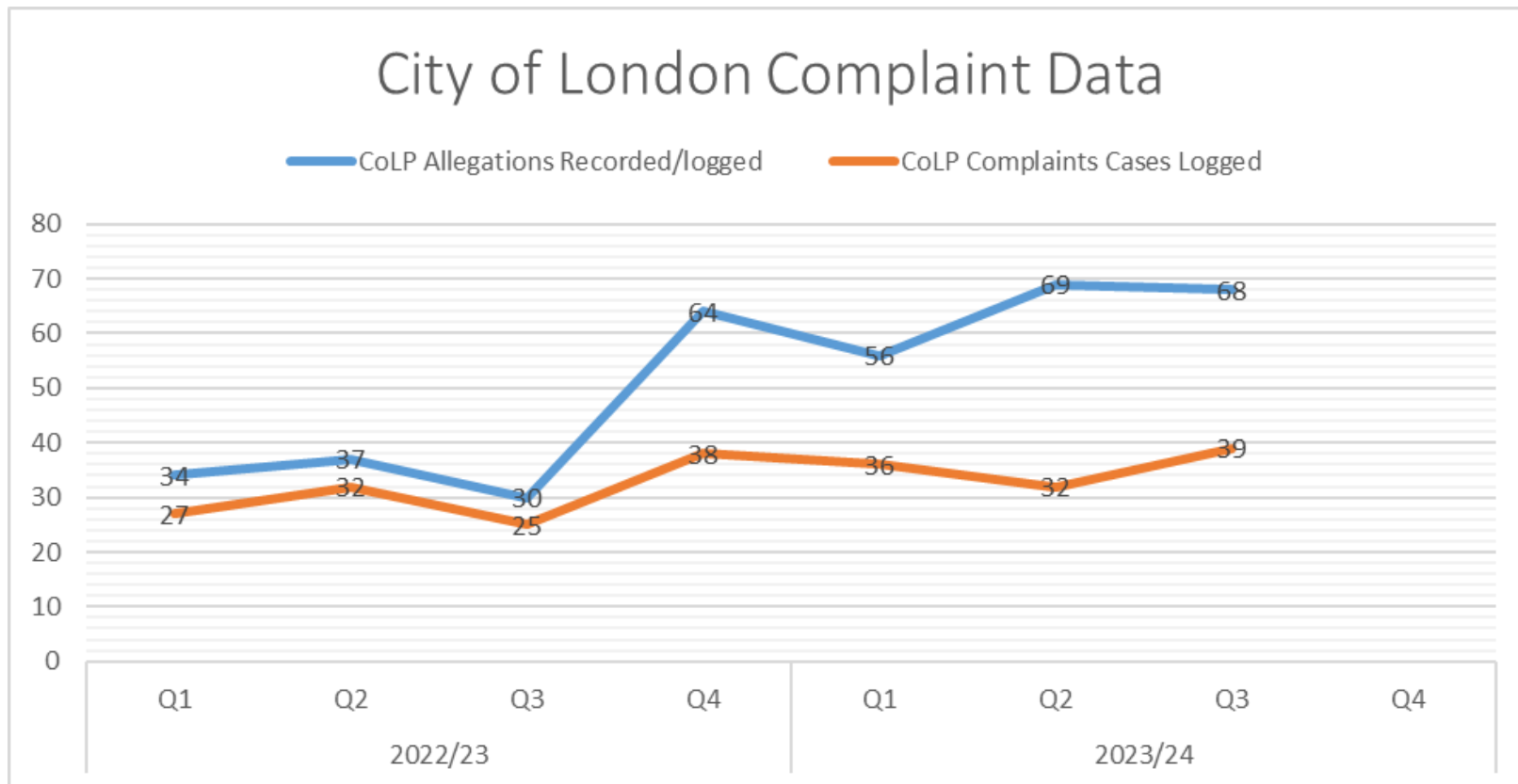
Handling of property and impolite language are new to the top allegations, all three others have featured in both the annual top 5 data 2022/23 and 2023/24.

Q4 has 3 out of 5 highest allegation type categories featured.

Ethnicity and discriminatory behaviour –

34% of complainant's ethnicity is recorded as Unknown. This is slightly lower 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 were five allegations of Discriminatory Behaviour logged during this reporting period. (3 Race and 1 Religion/Belief, 1 Other).



Summary of internal conduct cases and investigations– Q4 2023/24				
Metric	Number	Previous quarter (Q3)	# (%) change (Q on Q)	Comment
New conduct investigations recorded	15	6	150%	
Total live conduct investigations	44	36	22%	Total live cases of which a number are sub-judice
<i>Of which Gross Misconduct</i>	25	21	19%	
Conduct investigations finalised	5	4	25%	1 x Case to answer 1 x Reflective practise and 3 x No case to answer. 1 Discontinued
Investigations finalised within <30 days	5	1	400%	
Officers and staff on suspension	16	14	14%	
Officers and staff on restricted duties	7	6	17%	Includes officer under IOPC investigation
IOPC independent investigations	5	4	25%	Includes Westminster attack
	<p>Accelerated misconduct meetings None held Q4</p> <p>Misconduct meetings / hearings held - None held Q4</p>			

Appendices - Public

Appendix 1- Gifts and hospitality register – *is not available for this update. This is currently due to a system upgrade (old SharePoint to new Microsoft 365). This will be 'Live' from Q1 2024/25, which is reported to your September PSIC.*

Appendix 2- Chief Officers Register of group memberships- **Public**

Appendices- Non-Public

Appendix 3- Officers Suspended/ Restricted (**NON PUBLIC**)

Appendix 4- PCR Misconduct dip samples x 5 (**NON PUBLIC**)

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Appendix 2 - 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
9	17 May 2024	T/Commissioner	Pete O'Doherty	London Cyber Resilience Centre	Non-Exec Director
10	17 May 2024	T/ Commissioner	Pete O'Doherty	Sprite Plus Advisory Board (Academic Working Group)	Member
11	17 May 2024	T/Commissioner	Pete O'Doherty	Abertay cyberQuarter, Abertay University	Advisor
12	17 May 2024	T/Commissioner	Pete O'Doherty	Royal Humane Society	Panel Member

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