



Professional Standards & Integrity (Police) Committee

Date: WEDNESDAY, 25 SEPTEMBER 2024

Time: 1.45 pm

Venue: COMMITTEE ROOMS, GUILDHALL

Members: Michael Mitchell (Chair) Deputy James Thomson
Tijs Broeke (Deputy Chair) Florence Keelson-Anfu
Nicholas Bensted-Smith Jacqui Webster
Jason Groves Joanna Tufuo Abeyie
Deputy Madush Gupta

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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 summary of the meeting held on 4 June 2024.

For Decision
(Pages 5 - 10)

4. **OUTSTANDING REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 11 - 12)

5. **QUARTERLY STOP AND SEARCH AND USE OF FORCE UPDATE (Q1)**

Report of the Commissioner.

For Information
(Pages 13 - 20)

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

Report of the Commissioner.

For Information
(Pages 21 - 36)

7. **Q1 ACTION FRAUD COMPLAINTS**

Report of the Commissioner.

For Information
(Pages 37 - 40)

8. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q1**

Report of the Commissioner.

For Information
(Pages 41 - 82)

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

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

11. **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

12. **NON-PUBLIC MINUTES**

To approve the non-public minutes of the meeting held on 4 June 2024.

For Decision
(Pages 83 - 84)

13. **PROFESSIONAL STANDARDS, VETTING AND MISCONDUCT NON-PUBLIC APPENDICES**

Report of the Commissioner, to be read in conjunction with Item 8.

For Information
(Pages 85 - 128)

14. **POLICE COMMITTEE REPORT DIP SAMPLES OF MISCONDUCT**

Report of the Commissioner.

For Information
(Pages 129 - 138)

15. **VETTING REVIEW**

Report of the Commissioner.

For Information
(Pages 139 - 144)

16. **INCLUSIVE EMPLOYERS UPDATE**

Report of the Commissioner.

For Information
(Pages 145 - 150)

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, 4 June 2024

Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, Guildhall on Tuesday, 4 June 2024 at 10.00 am

Present

Members:

Michael Mitchell (Chair)
Jason Groves
Deputy Madush Gupta
Deputy James Thomson
Naresh Sonpar

Officers:

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

City of London Police

Paul Betts	- City of London Police
Sanjay Andersen	- City of London Police
Carly Humphreys	- City of London Police
Kate MacLeod	- City of London Police
Paul Doyle	- City of London Police
Emma Cunnington	- City of London Police

1. APOLOGIES

Apologies were received from Tijs Broeke and Nick Bensted-Smith.

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 and non-public summary of the meeting held on the 27 February 2024 were approved as an accurate record.

4. PUBLIC OUTSTANDING REFERENCES

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

Officers suggested that item 2 (9/2023/P) be closed down as this was scheduled to be submitted to the Police Authority Board for full review in July 2024. The Chair agreed and requested a circulation to the Professional Standards and Integrity (PSI) Committee ahead of the Police Authority Board as an informal update.

RESOLVED, - that the report be noted.

5. **ANGIOLINI INQUIRY- PART 1**

Members received a report of the Commissioner which provided an update on the City of London Police response to Part 1 of the Angiolini Inquiry.

Members welcomed the report and queried recommendations 14 & 15, which relate to the framework to underpin improving culture, and how this would be tracked and monitored. Officers assured Members that there was work ongoing to train the workforce in a dynamic and effective way through the Inclusivity Programme and a cultural audit pilot, developed to understand culture in all areas of the organisation. This cultural audit would complete in July 2024 and analysis will be reported to PSI Committee in September.

Members recognised the national challenge around female police officer recruitment and retention, and requested a recruitment plan to be shared with the Police Authority to evidence how this would be addressed.

Members discussed recommendation 7 which relates to home visits during the recruitment stages, and queried if this could be seen as discriminatory to certain individuals looking to join the City of London Police. Officers outlined that City of London Police would conduct home visits as the last stage of the vetting process, following national guidance to ensure that this would not impact negatively on attracting diverse candidates. A deep dive on vetting resourcing and process improvement would be taken by the City Police's Strategic People Board and would be reported to the PSI committee once completed for information. The Chair reminded Members that this recommendation came from the national Angiolini Inquiry report and that the City of London Police were looking at how to apply this guidance locally.

RESOLVED, - that the report be noted.

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

Members received a report of the Commissioner which provided an update on Equity, Diversity, and Inclusivity.

During the discussion the following points were noted:

- Members welcomed the report and highlighted the necessity to garner a culture in which the EDI strategy is embraced and an integral thread in the work of the City of London Police.
- Members suggested requesting proceeds of crime act (POCA) funding to support this work.
- Officers agreed to consider the attendance of a representative from Victim Support on the Strategic People Board, to ensure that victims would remain at the heart of all work undertaken.
- Officers considered the best approach for Members to hear directly from Staff Network about how this work was implemented.
- Officers had received training sessions about working with people with neurodiversity and learning disabilities, and the topic was built into the staff training module for all new recruits. New starters would also undertake assessments to ensure effective support throughout their policing careers and allow for greater acknowledgment of neurodiversity.

RESOLVED, - that the report be noted.

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

Members received a joint report of the Town Clerk and the Commissioner which provided an update on the City of London Independent Custody Visiting Scheme.

Members noted concern that the numbers of volunteers engaged in the scheme were low and were assured that arrangements had been made to streamline the onboarding process for volunteers to assist in increasing these numbers.

Members endorsed the proposal that an annual report on custody issues be submitted to the Police Authority for monitoring and oversight.

RESOLVED, - that the report be noted.

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

Members received a report of the Commissioner which outlined the Q4 stop and search and use of force data for 2023 – 2024.

Members queried the topical and season impacts on the disproportionality of stop and searches and use of force. Officers agreed to provide an analysis of this at the next meeting.

RESOLVED, - that the report be noted.

9. **Q4 ACTION FRAUD COMPLAINTS AND DISSATISFACTION 2023-24**

Members received a report of the Commissioner which outlined the Action Fraud complaints and dissatisfaction in Q4 of 2023 – 2024.

RESOLVED, - that the report be noted.

10. **ANNUAL COMPLAINTS REPORT 2022-23**

Members received a report of the Town Clerk which provided information about the annual complaints in 2022 – 2023.

Members noted that the numbers of complaints were comparable to those in the previous year and the most reported complaint related to delays and dissatisfaction with the service received. The report was shared in interests of transparency and officers noted areas of concern which required improvement.

Members requested a briefing about the length of time taken to log complaints and to follow up with the complaint reporters.

Officers highlighted that complaints data was not disaggregated between Action Fraud complaints and City of London Police complaints, and this had skewed the data. Officers assured Members that this data would be reported separately in future reports.

RESOLVED, - that the report be noted.

11. **Q4 PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE 2023-24**

Members received a report of the Commissioner which provided an update on professional standards, conduct and vetting in Q3 2023 – 2024.

Members noted concern about the increased number of misconduct cases but acknowledged that this evidenced greater trust in the reporting mechanisms. It was

outlined that the ambition of the Force was to detect and identify behaviours before they could escalate and spread.

The cultural audit in development, along with the staff survey were intended to create a culture in which staff and officers felt safe to report any discreditable behaviour and managers would be able to manage this effectively.

The Chair requested that all chief officer's disclosures would be published, including those with nothing to disclose, to ensure further transparency.

RESOLVED, - that the report be noted.

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

A Member questioned the actions planned to fill vacancies on the PSI Committee and felt it important that these would be filled as soon as possible. It was agreed that this was an opportunity for self-scrutiny in relation to the diversity and composition of the committee.

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 minutes of the meeting held on 2 February 2024 were approved as an accurate record.

16. **Q4 PSD COMPLAINTS CONDUCT AND VETTING REPORT - APPENDICES 3 AND 4**

Members received a report of the Commissioner which provided non-public appendices of the professional standards, conduct and vetting report, to be read in conjunction with item 11.

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

There were no questions.

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

There was no other business.

The meeting ended at 11:32am.

Chairman

Contact Officer: Kezia Barrass
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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	Complete - EDI strategy was agreed at July PAB.

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Committee(s): Professional Standards and Integrity Committee (PSIC)	Dated: 25 September 2024
Subject: Quarterly Stop and Search and Use of Force update (Q1)	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1- People are Safe and Feel Safe
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Commissioner of Police	For Information
Report author: T/Supt J Wynne, Taskforce and S&S Lead	

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 an overall increase of 20.6% since the previous quarter (Q4 2023 / 2024) and a 12% rise compared to the first quarter of 2023.

Even though there has been an increase in stop search there has also been an increase of items found which has again increased the success of positive outcomes from 43% to 46%. This puts CoLP in the top two nationally. This also accounted for a period that saw a slight increase in Black disproportionality from 2.3 to 2.4 and a decrease in Asian disproportionality from 1.4 to 1.0. There is no immediate or obvious reason that can account for these changes but they are within the expected range. (National rates 2023 - Black ethnicity – 4.10, meaning a person of black ethnicity is just over four times more likely to be stopped and searched than a white person, Asian ethnicity – 1.4 times more likely to stop searched). As a force, this puts us in the top ten in terms of low disproportionality rates amongst all the Home Office police forces with the lowest force nationally at 1.2 and the highest nationally at 13.8.

The University of East London project has been authorised and will provide academic and meaningful analysis of CoLP Stop & Search figures. Initial reports will be expected late 2024.

¹ Op Benbow- Cross Border mutual aid Operations with MPS











Recommendation

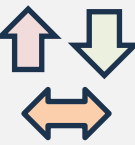









Members are asked to:

- Note the report.

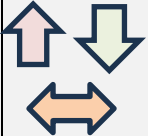



Stop and Search and Use of Force Data

- **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	720	+123 20.6%	  	Increase in stop/search but policing was centred around acquisitive crime with a number of proactive operations.
Arrest from stop search	219	+31 16.4%	 	Increase but again due to proactive operations centring around acquisitive crime and Night time economy
Searches under s.60	0	0		
Juveniles searched	60	+19 46.3%		Increase in youth search, but there has also been 2 school breaks within this period.
Black disproportionality	2.4	+0.1 0.4%		
Asian disproportionality	1.0	-0.4 -71%		
Total items found	340	+60 21.42%		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	15	+8 114.28%		
Strip search-More thorough	2	+2 200%		Although this shows a 200% increase, these are relatively small numbers. No clear reason for this increase.
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	977	+98 11.14 %		
Juvenile use of force	40	+3 8.10%		
Uses of force arrests	622	+40 6.87%		
Uses of taser	14	-9 39.13%		

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	1	+1 100%		
Live complaints relating to stop/search	2	-1 33.33%		
Live complaints relating to use of force	3	+2 200%		

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 are aware their responsibilities and CoLP will look to integrate with our systems and to ensure we have scrutiny and correct governance.

Conclusion

This report summarises City of London Police’s stop and search and use of force data for Q1 2024/25.

Appendices

- Appendix A – Information on Strip Search Policy and SOP

Report Author

T/Superintendent Jesse Wynne

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Appendix A

Information on Strip Search policy and SOP

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

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

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Committee(s): Professional Standards and Integrity Committee	Dated: 25 September 2024
Subject: Equity, Diversity, Inclusivity (EDI) Update	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1- People are Safe and Feel Safe
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Commissioner of Police	For Information
Report author: Lorraine Oyik, T/Equality & Inclusion Manager	

SUMMARY

This report will provide an update on Equity, Diversity & Inclusion (EDI) activity within the Force which includes highlights of activity regarding the E&I workstreams, the Police Race Action Plan, Violence Against Women & Girls and CoLP’s Inclusivity Programme.

Recommendation

Members are asked to:

- Note the report.

Main Report

INTERNAL UPDATES

Equity, Diversity & Inclusion Strategy

1. July 2024 saw the launch of our refreshed ‘Our People’ EDI strategy (2024-2027) with an event held at The Gherkin opened by T/Commissioner Peter O’Doherty and Mr Tijs Broeke, Chair of the Police Authority Board. The T/Commissioner acknowledged and apologised to colleagues and local communities who may have been unfairly treated in the past by City of London Police, reaffirming a zero-tolerance approach going forward, and citing our ambition to be “one of the most inclusive and trusted police services in the country.”

2. A short film, produced by Corporate Communications, featuring input from staff, partners and key stakeholders, to mark the strategy launch was played.
3. Focus now shifts to developing an implementation plan to drive progress and deliver outcomes.

Equity, Diversity & Inclusion Governance

4. The governance framework for CoLP's EDI has been refreshed to allow for clear alignment to the refreshed EDI strategy.
5. In addition to streamlining the governance, there is a greater focus on driving performance and accountability and tracking of progress against national and local plans and statutory obligations, including Police Race Action Plan, Violence Against Women and Girls (including White Ribbon commitments) and Business Disability Forum (BDF) action plan. Thematic dashboards covering each of the 4 thematic pillars (People, Processes, Policies, Public) have been developed. It is recognised that there remain some data gaps however the dashboards will continue to evolve in line with our new Data Strategy.

Inclusivity Programme

6. Two sessions were held at the end of June 2024 to mark the one year anniversary of the Inclusivity Programme launch. This was an interactive event aimed at not only highlighting the achievements of the programme but to capture the impact of the programme from colleagues and provide them with the opportunity to tell us how they would like to see it develop in the coming year.
7. All Senior Leaders submitted a pledge showing their commitment to EDI. While these pledges were not target driven, we asked for the pledges to be realistic and achievable in order to ask for an update at the same time next year for the 2 year anniversary.
8. Appendix A contains details of all upcoming Inclusivity Programme events and modules scheduled for delivery for the remainder of the year.

Inclusivity Programme Anniversary

Inclusivity Programme Anniversary – 27th June
Two sessions were run during the day.

Why did you attend?
Because I feel the programme is important and I was interested to hear more on the progress made.
Honestly - pushed towards it by LM, and glad I was.
Passionate about changing the culture of the organisation
As a new starter coming out of probation wanted to understand where we were and where we are
I was interest to know more about how Colp tries to make a safe environment where anyone can feel part of it
I signed up because I enjoyed the launch event and was interested in hearing what the plans were for the future
Because I think the whole programme has been great and wanted to celebrate that

Feedback
Hearing T/Commissioner O'Doherty's vision for where we go as a force and what active implementation of what is wanted looks like.
The whole event was very refreshing for an officer who has just not been with COLP long.
Hearing the update, what's coming up in the future and hearing POD's commitment to wellbeing
I thought that it was very well planned but especially enjoyed the T/Commissioner's input.
10/10
Seeing people that I haven't seen in a while and meeting new people, finding out about future events
I thought retired Sup Int Raj Kohli talk was interesting, particularly his early career in the MET and the culture that existed back then

We will use the ideas we received at this event to develop and grow the Inclusivity Programme

NOTABLE NATIONAL ISSUES AND DEVELOPMENTS

National Police Race Action Plan (PRAP)

- 9. On 20th June 2024, the National Black Police Association (NBPA) released a statement announcing their suspension of support for the National Police Race Action Plan. The NBPA acknowledged that some police forces were doing good work and were content for local Black Police Associations (BPA) to make their own decisions on their continued local support to forces.
- 10. The City of London Police's BPA released a statement, which while supporting the NBPA's position, affirmed their continued to support working with the force to deliver the local Race Action Plan. This was in recognition of the improved relationship and commitment demonstrated to making change.

Violence Against Women and Girls (VAWG)

- 11. Professionalism & Trust have mapped and transferred activities sitting under the original three pillar national VAWG plan (building trust and confidence, relentless perpetrator pursuit and creating safer spaces), against the revised national 4P approach of Prepare, Protect, Prevent, Pursue.
- 12. There are three primary considerations for VAWG:
 - How safe women are in the City
 - How safe they feel
 - Differences between how safe women *are* and how safe they *feel*.

13. Using the National Police Chief Council's National VAWG Self-Assessment framework, we have reviewed all of the 35 actions and have assessed 19 as Maturing (green) with the remaining 16 actions assessed as Embedding (amber). It is forecast that these 16 actions will move to 'green' status' by the end of the year. Progress is overseen at the Equity, Diversity & Inclusivity Strategic Board.
14. A series of engagement sessions will shortly be delivered across the force to ensure transparency, close actions and confirm owners for new activities.

FORWARD LOOK

Cultural Audit

15. Our cultural audit aims to identify and map behaviours and culture negatively impacting on how people feel at work, specifically conduct and behaviors not meeting the threshold of misconduct. It also includes a 'risk profiling' exercise, to understand the scale and reach of the issues identified. Through understanding the culture, not only can appropriate interventions be put in place, helping to create an inclusive and psychologically safe environment, it will inform the development of more broad reaching prevention activities such as training.
16. Since last reporting, the pilot phase and analysis has now concluded, the results of which will be reported to Chief Officer Meeting in September 2024.

Code of Ethics

17. Ethical Dilemmas training has been delivered to Inspectors and Staff Managers over the last few months. In addition, a further series of sessions have been scheduled for delivery between July and November 2024 for colleagues without supervisory responsibility. The session provide staff with the tools to have ethical conversations in their teams.
18. The training has been delivered to approximately 40 people. The evaluation framework for this training is being developed.
19. The City of London Police will be delivering a Code of Ethics roadshow on 25th November 2024.

Staff Support Networks and Associations (SSNA)

20. Staff Support Networks and Associations (SSNA) play an important role as a critical friend to the organisation, acting as a collective voice of staff to management, and helping deliver organisational change. In recognition of the value placed on this group, following consultation with the SSNA and benchmarking with other forces, Professionalism & Trust have prepared a report proposing recommendations to improve the governance and support provided to these groups. The report will shortly be presented at Chief Officer Meeting for discussion and ratification.

Inclusive Employers Accreditation

21. The force's submission to Inclusive Employers was completed in June 2024. We await the results, which we anticipate being shared in September-October

2024, following which an update will be provided to this Committee. At the last assessment completed in 2020, the force was assessed as 'Compliant'. With all of the good work being undertaken across the force, we are hoping that this assessment will reflect the commitment and progress made, moving us towards a rating of 'Established'.

22. Appendix B includes the data submitted to Inclusive Employers for the assessment.

Conclusion

This report provides an update on Equity, Diversity & Inclusion (EDI) activity within the City of London Police with particular focus on the E&I workstreams, the Police Race Action Plan, Violence Against Women & Girls, CoLP's Inclusivity Programme, cultural audit, Code of Ethics, Staff Networks & Associations, and the Inclusive Employers Accreditation.

Appendices

- Appendix A - upcoming Inclusivity Programme events and modules
- Appendix B – data submitted to Inclusive Employers

Report Author

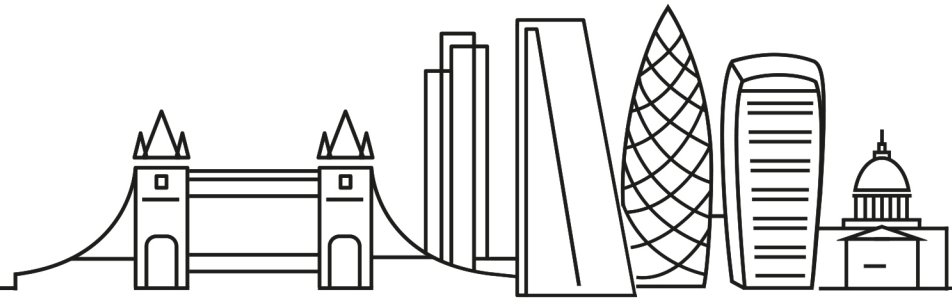
Lorraine Oyik, T/Equality & Inclusion Manager
Professionalism & Trust
E: Lorraine.oyik@cityoflondon.police.uk

Date	Title	Content
Autumn TBC	Focus on Anti-Muslim Hate	To be provided by Tell Mama, dates to be confirmed
Autumn 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.	

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Inclusive Employers Assessment Data

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A local service with a national role, trusted by our communities to deliver policing with professionalism, integrity and compassion

Engage

- How does your organisation gather staff diversity?
- How many staff diversity characteristics does your organisation monitor?
- Of the diversity data you collect, what proportion of employees have disclosed their data on the employee database/HR system?
- Has your organisation communicated with staff in order to increase the disclosure of diversity data in the last 3 years?
- How has your organisation been communicating with staff over the past 12 months in relation to its inclusion agenda, objectives and activities?
- Does your organisation participate in National Inclusion Week or other external inclusion campaigns/celebrations?
- Does your organisation have any methods for engaging with under-represented groups such as Employee Network Groups?
- Have you conducted a staff survey in the last 18 months which provided feedback on staff experiences relating to inclusion (e.g. did it touch on topics such as respect, fairness, equality, diversity, inclusion, harassment or discrimination) and/or that was analysed by protected characteristic?



Equip

- How is your organisation promoting inclusion and diversity through its policies?
- What training do you provide for staff on inclusion-related topics?
- What training do you provide for line managers on inclusive management practice and behaviours?
- How does your organisation support line managers to embed consideration of inclusion and diversity into key processes/elements of the employee lifecycle i.e. what guidance, training, policies, etc are in place to enable this?

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Empower

- What staff engagement methods does your organisation utilise to enable all staff to have input into wider organisational decision-making, beyond Inclusion and Diversity issues?
- In the last 12 months, to what degree have your staff been empowered to self-organise their own inclusion-related activities/programme? (This could be activity organised through Employee Network Groups or other relevant means)
- How does your organisation recognise the contribution of staff who are self-organising and contributing to a programme of inclusion-related activity? (This could be activity organised via your Employee Network Groups or other means.)
- How has your organisation visibly profiled inclusion role models and their stories in the last 12 months?
- Does your organisation have inclusion champions (nominated staff with responsibility for championing inclusion at a strategic/operational level, either across the organisation or within a particular function)?
- How are you ensuring that mainstream career enhancing learning and development opportunities are accessible to all existing staff including those from under-represented groups?

• Page 32.



Embed

- How does inclusion feature in your corporate strategy?
- Does your organisation have an Inclusion and Diversity Strategy?
- How is inclusion embedded into departmental business plans?
- Who has oversight and accountability for raising the bar on inclusion within your organisation and what methods are in place to ensure they are achieving this?
- How does your organisation ensure that inclusion is considered as part of wider decision-making, for example when key proposals (such as those relating to policies, processes, products or services) are being developed or reviewed?
- What action are you taking to eliminate any pay gaps on the basis of diversity characteristics or maintain a position of zero pay gaps?
- What activities do you have in place to attract under-represented groups as part of the recruitment and selection process?
- Outside of recruitment activity, what positive action activities has your organisation undertaken to address under-representation of marginalised groups?
- What steps have you taken to incorporate consideration of inclusion in your performance review process for all staff?
- How has your organisation supported members of the board/senior managers to increase their understanding and confidence around inclusion and the experiences of staff from under-represented groups in the last 24 months?
- What steps have you taken to incorporate consideration of inclusion in your performance review process for all staff?



Evaluate

- How does your organisation make use of diversity data relating to staff headcount/profile?
- How does your organisation make use of diversity data relating to other aspects of the employee lifecycle?
- How does your organisation make use of qualitative data to measure progress on its inclusion and diversity objectives, to inform future programmes, initiatives and strategy?



Evolve

- How does your organisation measure the return on investment (ROI) from your inclusion and diversity strategy/activities?
- How does your organisation ensure it is continuously horizon scanning externally and gathering best practice on inclusion to adopt internally?
- How is your organisation demonstrating broad leadership and role modelling around the inclusion agenda externally?

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Summary of Action Fraud public complaints data– Q1 2024/25				
Metric	Current quarter (Q1)	Previous quarter (Q4)	(%) change (Q on Q)	Comment
Complaints – Schedule 3	0	1	0%	A total of 92 cases were logged in Q1 2024/25. This is an overall decrease of 13 cases from Q4 2023/24 (12%) The average number of cases logged over the previous 5 quarters is 97 per quarter, Q1 is below average. It has been identified not all complaints logged in the AF SUGAR system have been logged into the PSD (centurion database). This is being rectified ¹ .
Complaints – not Schedule 3	92	104	12%	
Allegations	94	240	61%	There were 94 allegations recorded in Q1 2024/25. This is an decrease of 146* allegations from Q4 2023/24 (61%). The average number of allegations over the previous 5 quarters is 96 per quarter. Q1 is below 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	5		<i>Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.</i>
Average time to contact complainant (days)	N/A	35		
Complaints finalised – Schedule 3	5	33	85%	Average number of total cases finalised is 62 over the last 5 quarters. Q1 is therefore above average with total of 66 finalised.
Complaints finalised - not Schedule 3	61	80	24%	
Average time to finalise complaint cases (days) – Schedule 3	Case combined data average 154 days	97	n/a	<i>Timeliness is taken from IOPC published bulletins and available retrospectively.</i> <i>Case combined data average 154 days (ex subjudice). YTD. IOPC bulletin will publish breakdown by case type logged.</i>
Average time to finalise complaint cases (days) – not Schedule 3		75	n/a	
Applications for review sent to local policing body	1	0		One recorded during Q1
Applications for review sent to IOPC	0	0		None recorded during Q1

Nature of allegations – Of the 94 allegations recorded during Q1 2024/25 the highest number was in the category of, A1 – Police action following contact (77) followed by A3 – Information (9) and A4 - General level of Service (5). Reasons for complaint mostly relate to customer expectation of Action Fraud, with either the lack of contact or investigation cited. This is a decrease in allegations recorded against Q4 of 146 (61%).

The AF admin team rectified the year end data during Q4 with adding allegations to previous quarter logged cases. The allegation date is added into the database within the quarter so was not an accurate reflection of Q4 allegations. Cases generally have one allegation when related to Action Fraud complaints. Q1 is therefore a true reflection of the allegations/case totals.

Members of Parliament -

There have been 39 miscellaneous cases logged where MPs have made contact with PSD on behalf of a constituent. This is much lower than the previous quarter. The average being logged as 47 over the last 5 quarters. This drop is likely due to the general election campaign period falling during Q1.

Action Fraud –

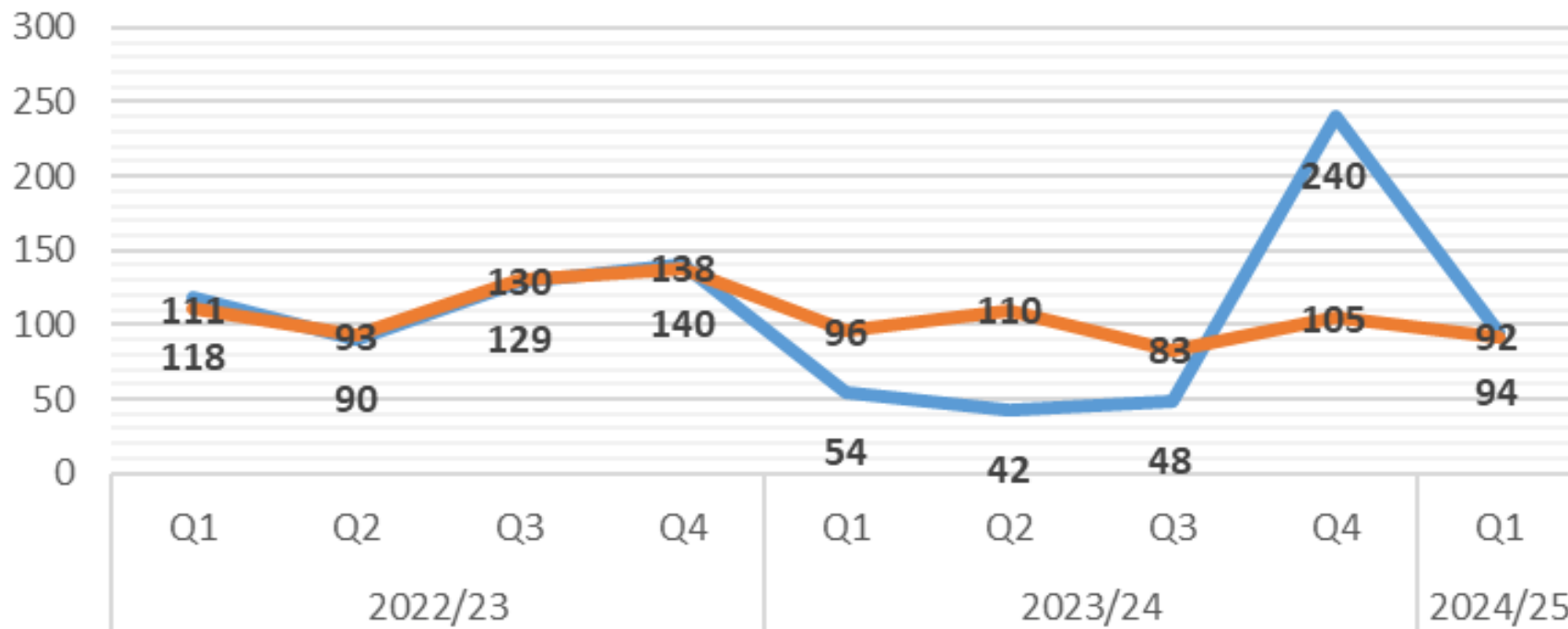
In **QTR 1** of the 2024/25 Financial Year Action Fraud recorded **157,678** reports on the National Fraud Database (**111,929** crime reports and **45,749** Information reports).

The complaint figures (total) represent 0.06% of the total number of Action Fraud reports recorded in Q1.

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

Action Fraud complaint data

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



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Agenda Item 8

Committee(s): Professional Standards and Integrity Committee	Dated: 25 September 2024
Subject: Professional standards, conduct, and vetting Update Q1	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1- People are Safe and Feel Safe
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Commissioner of Police	For Information
Report author: D/Supt Humphreys/PC Ann Roberts Professional Standards Dept	

Summary

- Overall, the volume of Complaints has decreased by 43% in comparison to Quarter 4. There has also been a decrease in the number of new Conduct Cases this Quarter with 7 new cases, the majority have been assessed as Gross Misconduct.
- The Professional Standards Department is improving the rate of investigation timeliness, meaning that more cases are now going through the Meeting and Hearing processes. Consequently, members will be seeing an increase in the number of Gross Misconduct cases they are updated on.
- There remains 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 now come into effect. A number of Chief Officers have now been trained to complete this role.
- The Vetting team has now benefitted from an uplift in resources to improve upon the timeliness of new vetting applications being progressed.

I. 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 first quarter of 2024/25 (April - June).

This quarter the total number of CoLP complaint cases logged is 30.

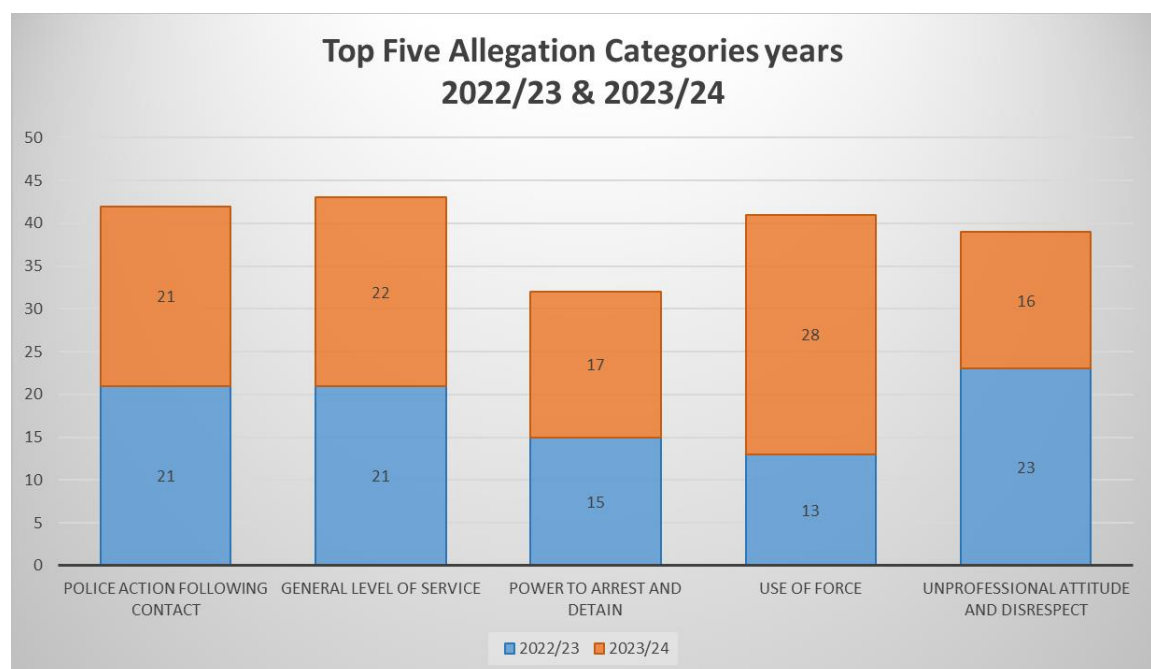
This is separated into 4 dealt with under Schedule 3 of the Police Reform Act 2002 and 26 not within Schedule 3. This figure of 30 complaints is a decrease compared against Q4 where a total of 53 complaints were logged; 11 under Schedule 3, and 42 not within Schedule 3. Compared against the same period (Q1) last year 2023/24 the total number of CoLP complaint cases logged was 36. (10 Schedule 3 and 26 not within Schedule 3).

Of the 44 allegations recorded during Q1 2024/25 the highest number were in the category Impolite language / tone (7) Police action following contact (5) General level of service (4) Power to arrest and detain (3).

This is a decrease in allegations recorded against Q4 of 16 (27%).

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 Q1, 2 allegations were 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 Q1.

Q1 has 4 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: Impolite language/tone (7), Police action following contact (5), General level of Service (4) and Power to Arrest and detain (3)



The data and trend narrative is shared across all directorates via the PSD SPOCs (Specified Points of Contact) and within the PSD Working Group, to ensure that it can be used to improve service delivery. Trends across complaints and conduct data are also informing or PSD 'Protect' Plans for pro-actively engagement (mentioned later in this report).

Q1 – Data examination: -

Analysis of the highest allegation categories (the latest Q1 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:

The allegation type of Impolite language or tone recorded during Q1 identified that the 8 allegations were within 8 cases (3 Non-Schedule 3 and 5 Schedule 3). 2 of the Non-Schedule 2 cases have been Resolved and 1 remains live. 1 schedule 3 case was deemed no further action, All other cases remain Live with 1 case being IOPC Independent. There were no trends to the complaints logged or learning matters identified.

The total number of allegations finalised during Q1 is 58 compared to 113 in the previous quarter.

Of the 58 allegations finalised:

- 24 Resolved
- 23 Service provided was acceptable
- 5 Not resolved/No further action
- 3 No further action
- 2 No Case to answer

1 Service provided was not acceptable – This related to the allegation type Evidential Procedures - the nature of which was a failure to provide evidence to court on appeal (Body worn video) due to it being incorrectly saved.

To note, cases often contain more than one allegation; the number of cases finalised in Q1 is 38, compared to 83 finalised in Q4.

Of the cases finalised 12 were logged as Schedule 3, and 26 were not under Schedule 3. There were no cases finalised under the previous regulations.

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

During this quarter, 7 new conduct investigations were recorded, and 7 were finalised. There are currently 45 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.

Seven Conduct matters have been finalised: 5 cases contained ‘Reflective Practice’ as an outcome, 2 cases resulted in ‘No Case to Answer’ no action.

One accelerated Misconduct Hearing, One Misconduct Hearing and one Misconduct meeting took place during Q1. Two officers were Dismissed without notice and placed on the Barred list, and one officer received Reflective practise in conjunction with two written warnings. These cases will be within the finalised data for Q2.

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

- Pension Forfeiture: The ability to seek a Pension Forfeiture where a police employee has received a conviction for an offence in connection with their duty, has been in place for some time. However, nationally the Home Office considered that this was under-utilised and that not all forces had a robust process in place.

A review of our Pension Forfeiture processes has been undertaken in collaboration with the Police Authority, Human Resources and Pension teams. Although pension forfeitures were considered in applicable cases previously, there had been no defined process in place. There is now a collaborative process with the Police Authority team, pensions office and Home Office to ensure that in appropriate cases, pension forfeiture applications are being made.

- Police Long Service and Good Conduct Medals: The Home Office are collating details regarding the list of individuals who have been flagged regarding their medals potentially being removed. These involve officers who have been dismissed and placed on the barred list, presently there are two CoLP former officers which this process would be applied to.

Medals are an important way that government, and society as a whole, can show gratitude to those who have provided exemplary service to the police. In the case of Police Long Service Good Conduct Medals, the recipients can wear them with pride knowing that it represents consistent service of a high standard. Where an individual continues to have the right to wear a medal when they have been dismissed from policing, it devalues the award for their colleagues who truly earned that right. It is for this reason we contacted you previously to provide a list of officers who should have their medals forfeited.

- Vetting: A separate report on Vetting will be provided to the next PSIC.

II. Forward look

- IOPC: Last year the IOPC explored how forces respond to Police Perpetrated Domestic Abuse (PPDA). This resulted in all forces being surveyed last year to understand how they recorded and responded to PPDA. This aided the IOPC to understand the challenges facing policing in this area and what is working well. The review was also complimented by a number of professional discussions with Professional Standards Departments (not CoLP) to explore the main themes. This Autumn, the IOPC will publish their findings and CoLP will ensure that any national recommendations are embedded into our recording and responding to PPDA.
- Vetting Authorised Professional Practice (APP): The new Vetting APP is still awaited following the consultation undertaken earlier this year.
- Protect Programme and Learning: The PSD Engagement Officer and Counter-Corruption Unit are designing a 'Protect Programme' to pro-actively safeguard from the risks of corruption and misconduct. This is a piece of work which is centred around organisational learning from local and national conduct cases to ensure that where preventative action can be taken, this is implemented quickly and reviewed to assess whether the approach has been effective. A recent example of this has been in response to disclosures of wrongdoing being made to employees, the learning identified was to ensure that employees are provided with guidance regarding what is expected of them in those circumstances, ranging from how to report the matter and how to support the employee who may be a victim or witness. One of the benefits of PSD being part of the Professionalism and Trust directorate, is that this learning can be further cascaded through varied programmes of work within the Inclusivity Culture and Organisational Development (ICOD) and Learning and Development (L&D) teams.

Summary of public complaints data – Q1 2024/25

Metric	Current quarter (Q1)	Previous quarter (Q4)	Previous year (Q1)	(% change (Q on Q))	(% change (Y on Y))	Comment
Complaints – Schedule 3	4	11	10	64%	60%	A total of 30 cases were logged in Q1 2024/25. This is an overall decrease of 23 cases from Q4 2023/24 (43%)

Complaints – not Schedule 3	26	42	26	100%	0%	The average number of cases logged over the previous 5 quarters is 38 per quarter, Q1 is below average.
Allegations	44	60	56	27%	21%	There were 44 allegations recorded in Q1 2024/25. This is a decrease of 16 allegations from Q4 2023/24 (27%).

						The average number of allegations over the previous 5 quarters is 59 per quarter. Q1 is below average.
Average time to log complaints (days)	1	0	1	100%	No Change	<i>Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.</i>
Average time to contact complainant (days)	1	9	2	89%	50%	
Complaints finalised – Schedule 3	12	27	3	56%	300%	

Complaints finalised - not Schedule 3	26	56	13	54%	100%	
Average time to finalise complaint cases (days) – Schedule 3 (NOT including subjudice cases)	112	150	97	100%	15%	<i>Timeliness is taken from IOPC published bulletins and available retrospectively. Q4 is cumulative Year End quarterly data.</i>

Average time to finalise complaint cases (days) – not Schedule 3	37	84	65	56%	43%	
Applications for review sent to local policing body	2	1	1	100%	100%	
Applications for review sent to IOPC	1	5	0	150%	100%	
	<p>Nature of allegations – Of the 44 allegations recorded during Q1 2024/25 the highest number were in the categories of Impolite language / tone (7) Police Action following contact (5) Race (5) General level of Service (4) Power to Arrest and Detain (3)</p> <p>This is a decrease in allegations recorded against Q4 of 16 (27%).</p>					

Allegation types: 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.

Q1 2024/25 contains 4 out of the above top allegation types. Use of Force does not feature this quarter.

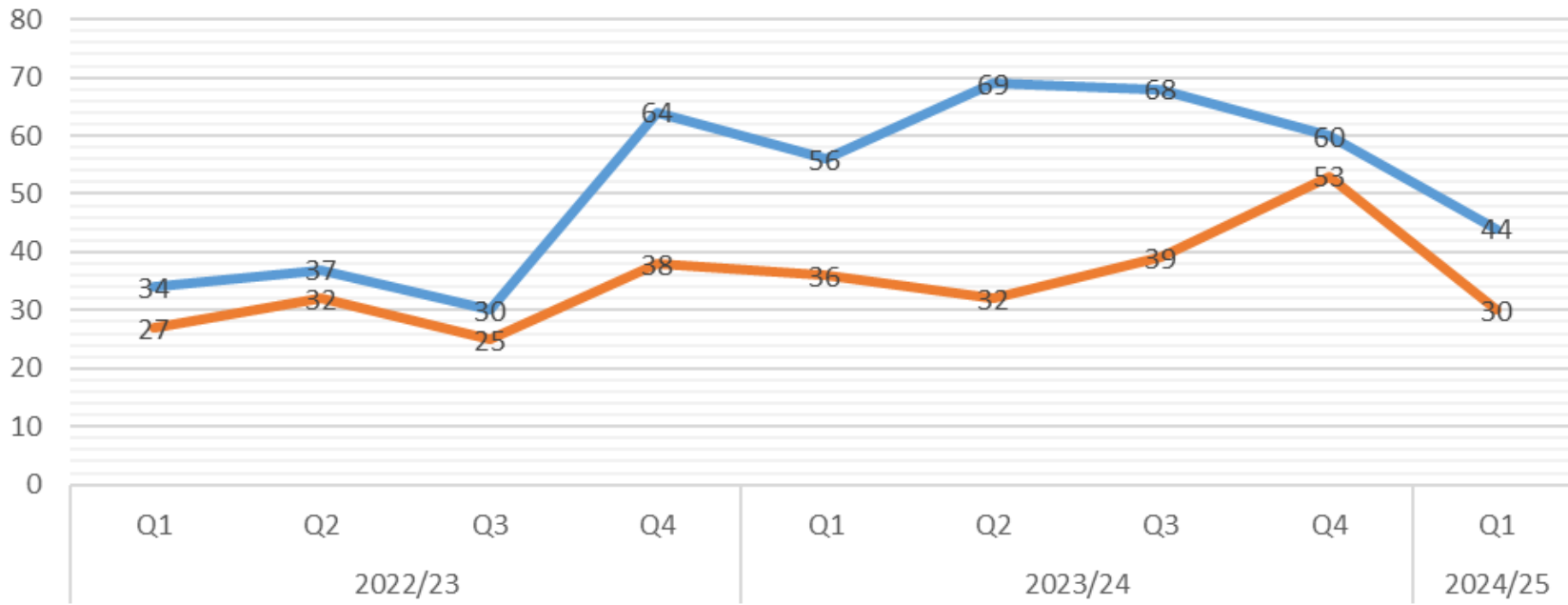
Ethnicity and discriminatory behaviour –

46% of complainant's ethnicity is recorded as Unknown. This is higher against the previous quarter. It is very difficult to report on any trends, either locally or nationally due to insufficient CoLP or IOPC data. There is no legal requirement for complainants to provide any EDI data and there is a low declaration rate across all Forces/IOPC.

There was five allegations of Discriminatory Behaviour logged during this reporting period. (5 Race).

City of London Complaint Data

CoLP Allegations Recorded/logged CoLP Complaints Cases Logged



Summary of internal conduct cases and investigations– Q1 2024/25

Metric	Number	Previous quarter (Q4)	# (%) change (Q on Q)	Comment
New conduct investigations recorded	7	15	53%	
Total live conduct investigations	45	44	2%	Total live cases of which a number are sub-judice

<i>o.w. gross misconduct</i>	25	25	0%	
Conduct investigations finalised	7	5	25%	5 x No case to answer - Reflective practise. 2 x No case to answer - no action.
Investigations finalised within <30 days	2	5	60%	

Officers and staff on suspension	23	16	44%	Includes officer under IOPC investigation
Officers and staff on restricted duties	7	6	14%	Includes officer under IOPC investigation
IOPC independent investigations	5	4	25%	Includes Westminster attack

Accelerated misconduct meetings held Q1

One Accelerated Misconduct Hearing held. Discreditable conduct (Drugs). Officer had resigned. Case to Answer - Officer would have been Dismissed without notice. Placed on Barred list.

Misconduct meetings / hearings held Q1

One Misconduct Meeting held. Orders and Instructions (3 allegations) relating to police driving. Case to Answer - 1 x Reflective practise and 2 x Written Warnings issued.

One Misconduct Hearing held. Discreditable conduct (sexual) and Honesty & Integrity. Case to answer. 1 x Misconduct 1 x Gross Misconduct - overall finding Gross Misconduct - Dismissed without notice. Placed on Barred list.

Appendices - Public

Appendix 1- City of London- IOPC complaints bulletin – Q1

Appendix 2- Gifts and hospitality register – The G&H system has been upgraded (old SharePoint to new Microsoft 365). This is now 'Live' from Q1 2024/25.

Appendix 3- Chief Officers Register of group memberships

Appendices- Non - Public

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

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Reporting Period: 01 April 2024 - 30 June 2024 (Q1 2024/25)

About this bulletin

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

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

Please note: Unless stated otherwise, tables within the bulletin consist of 'year-to-date' figures covering all matters being started or completed between the two dates.

Q1: 1 April to 30 June, Q2: 1 April to 30 September, Q3: 1 April to 31 December, Q4: 1 April to 31 March

Where charts refer to separate quarters the dates are: Q1: 1 April to 30 June, Q2: 1 July to 30 September, Q3: October to 31 December, Q4 1 January to 31 March.

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Page 1 Section A1.1: Complaints and allegations logged – totals and per 1,000 employees, Section A1.2: Means of handling – reasons a complaint is recorded under Schedule 3

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Page 3 Section A1.4: Allegations logged – what has been complained about – top five allegation categories and their subcategories

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Page 5 Section A1.6: National complaint factors on the top five allegation categories

Page 6 Section A2: Allegations timeliness

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Page 9 Section B1.1 Allegation actions on allegations handled outside of Schedule 3

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Page 12 Section C2: Outcomes on reviews

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Acronyms used in this bulletin

YTD – Year to date figures, **SPLY** - Same period last year, **MSF** - Most similar force, **LPB** - Local policing body, **PRA** - Police Reform Act 2002

Nat. – National, **RPRP** – Reflective Practice Review Process, **UPP** – Unsatisfactory Performance Procedure

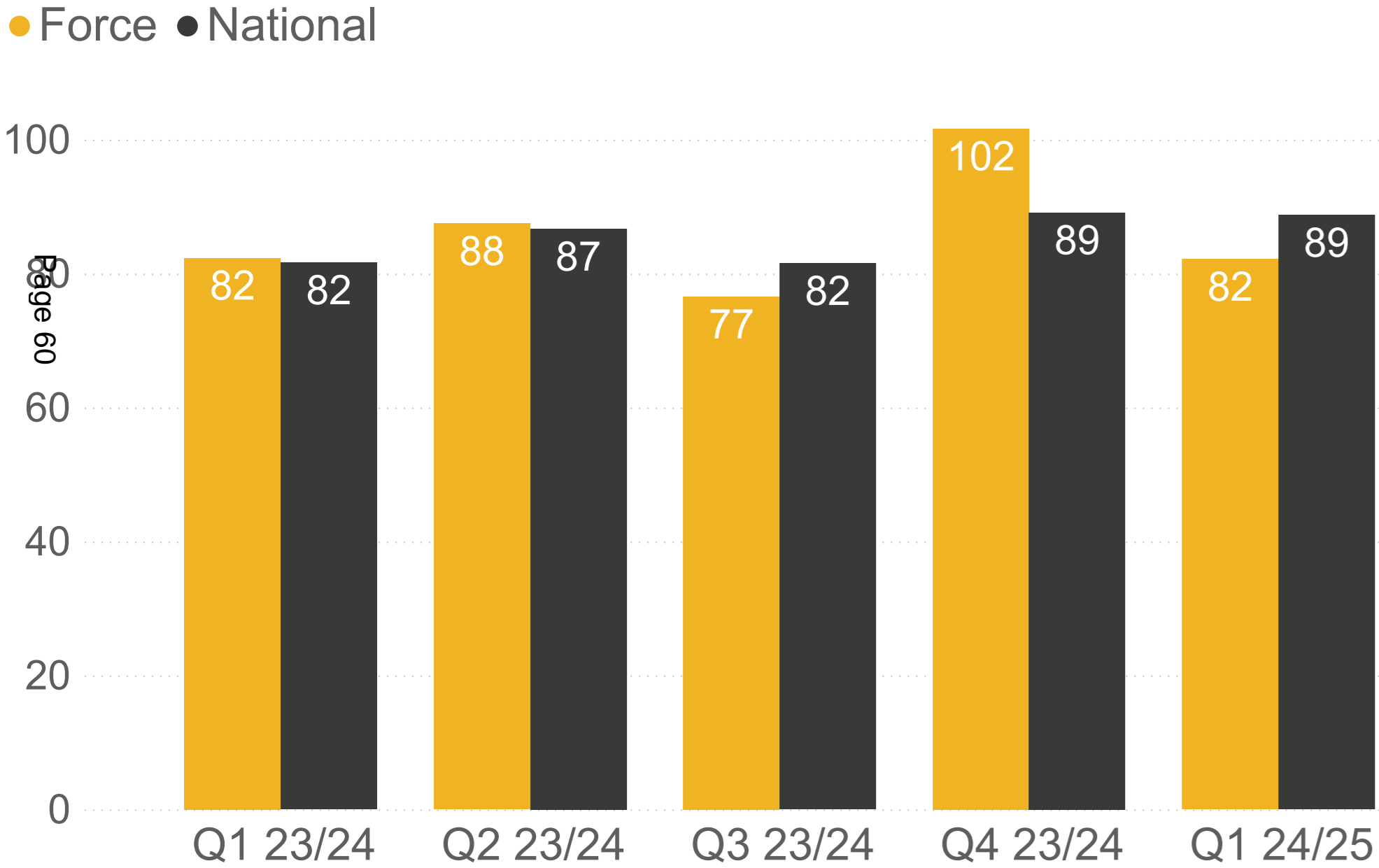
Section A1.1: Complaint cases and allegations logged

A complaint case is formed of one or more allegations. Numbers per 1,000 employees are used to demonstrate how the number of complaints/allegations against a force compare to their most similar force group and national figures. The force should contact the complainant and log the complaint as soon as possible after the complaint has been raised. Working days to contact/log is customer perspective.

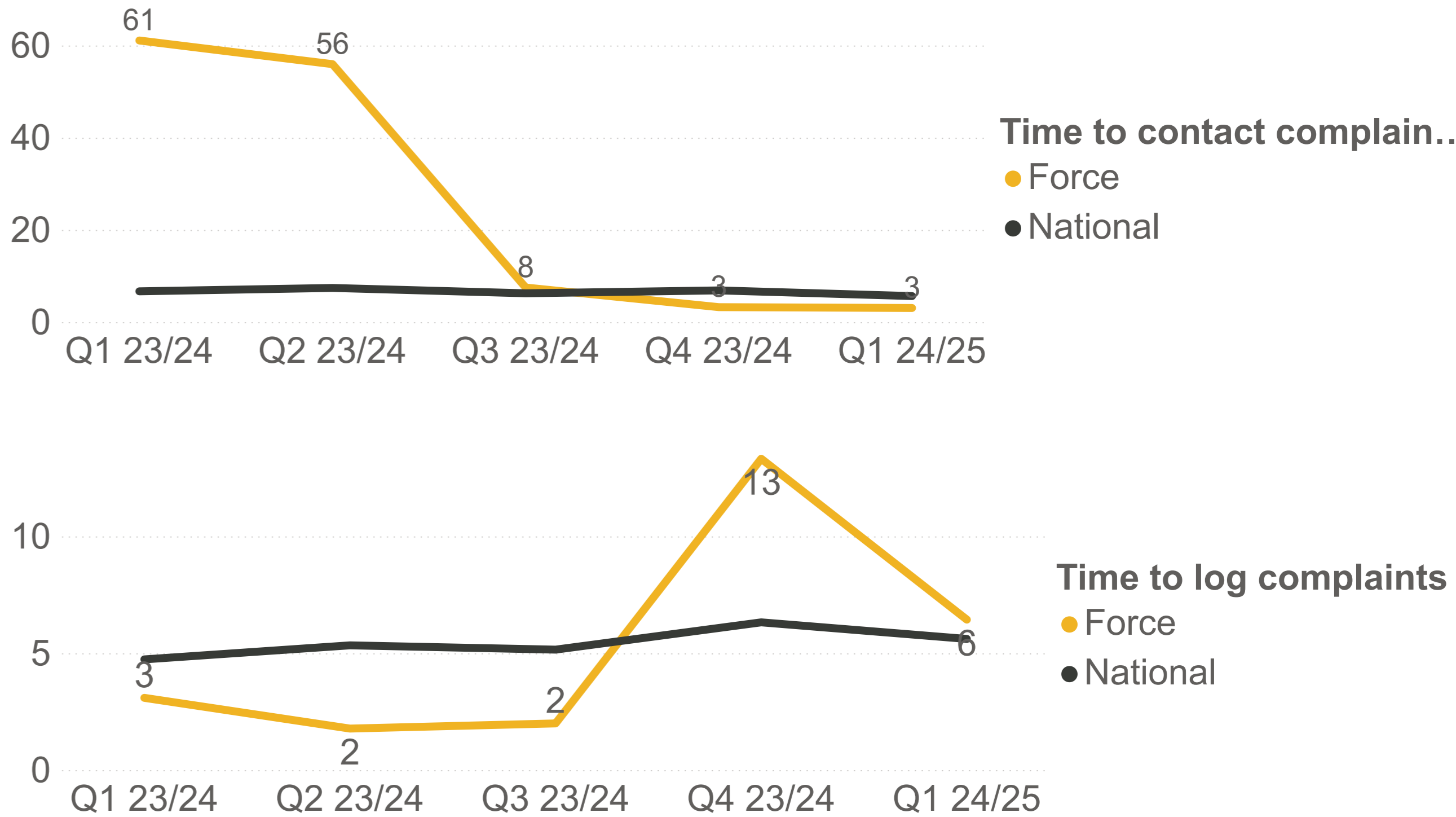
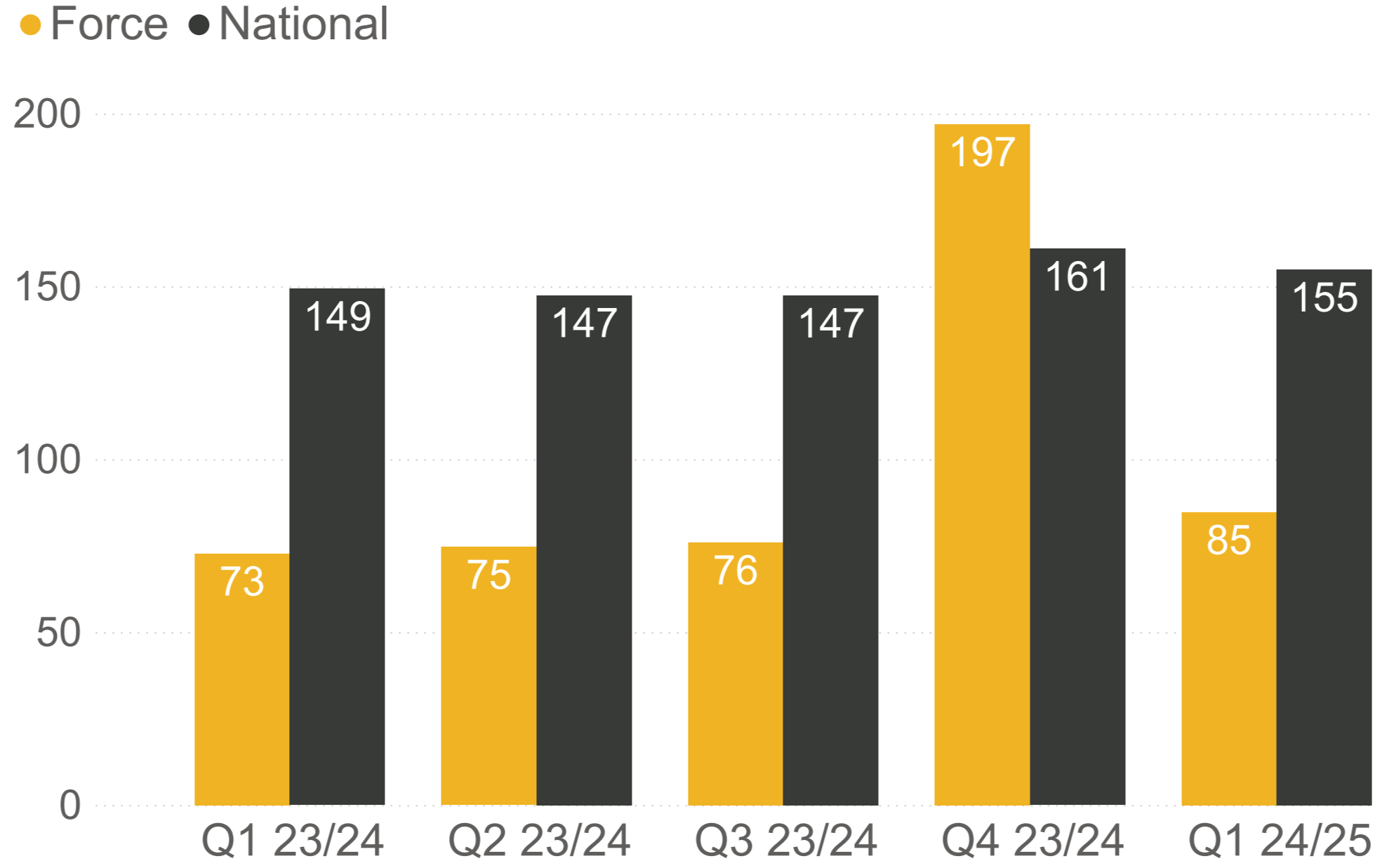
Note: Number of employees is a fixed number through the period, therefore complaints and allegations per 1,000 employees is higher for the full period (as in the table) than when broken down in to quarters (as per the charts)

Year to date	Complaint cases logged	Complaints per 1,000 employees	Allegations Logged	Allegations per 1,000 employees	Average working days to contact complainants	Average working days to log complaints
Force	132	82	136	85	3	6
SPLY	128	82	113	73	61	3
National	22,622	89	39,473	155	6	6

Complaints logged per 1,000 employees



Allegations logged per 1,000 employees



For space reasons, the figures in the above charts are the force averages only

Section A1.2: Reason for complaints to be logged under Schedule 3

Allegations should have an allegation category applied to them which will identify the root of what the allegation is about.

Forces can handle a complaint informally (known as Outside of Schedule 3), this should be used to deal with lower level complaints.

If a complaint is handled formally under Schedule 3, the force should record the reason why.

For more information on Schedule 3 of the Police Reform Act see here:

[Guidance on capturing data about police complaints.](#)

Reason complaint case recorded under Schedule 3 (YTD)	Force	SPLY	National
AA/body responsible for initial handling decides	4	10	3,426
Complainant wishes the complaint be recorded	0	0	1,294
Dissatisfaction after initial handling	0	9	1,062
Nature of the allegation(s) in the complaint	1	3	1,571
Total	5	22	7,353

Reason complaint case recorded under Schedule 3 (YTD)	Force	SPLY	National
AA/body responsible for initial handling decides	80 %	45 %	47 %
Complainant wishes the complaint be recorded	0 %	0 %	18 %
Dissatisfaction after initial handling	0 %	41 %	14 %
Nature of the allegation(s) in the complaint	20 %	14 %	21 %

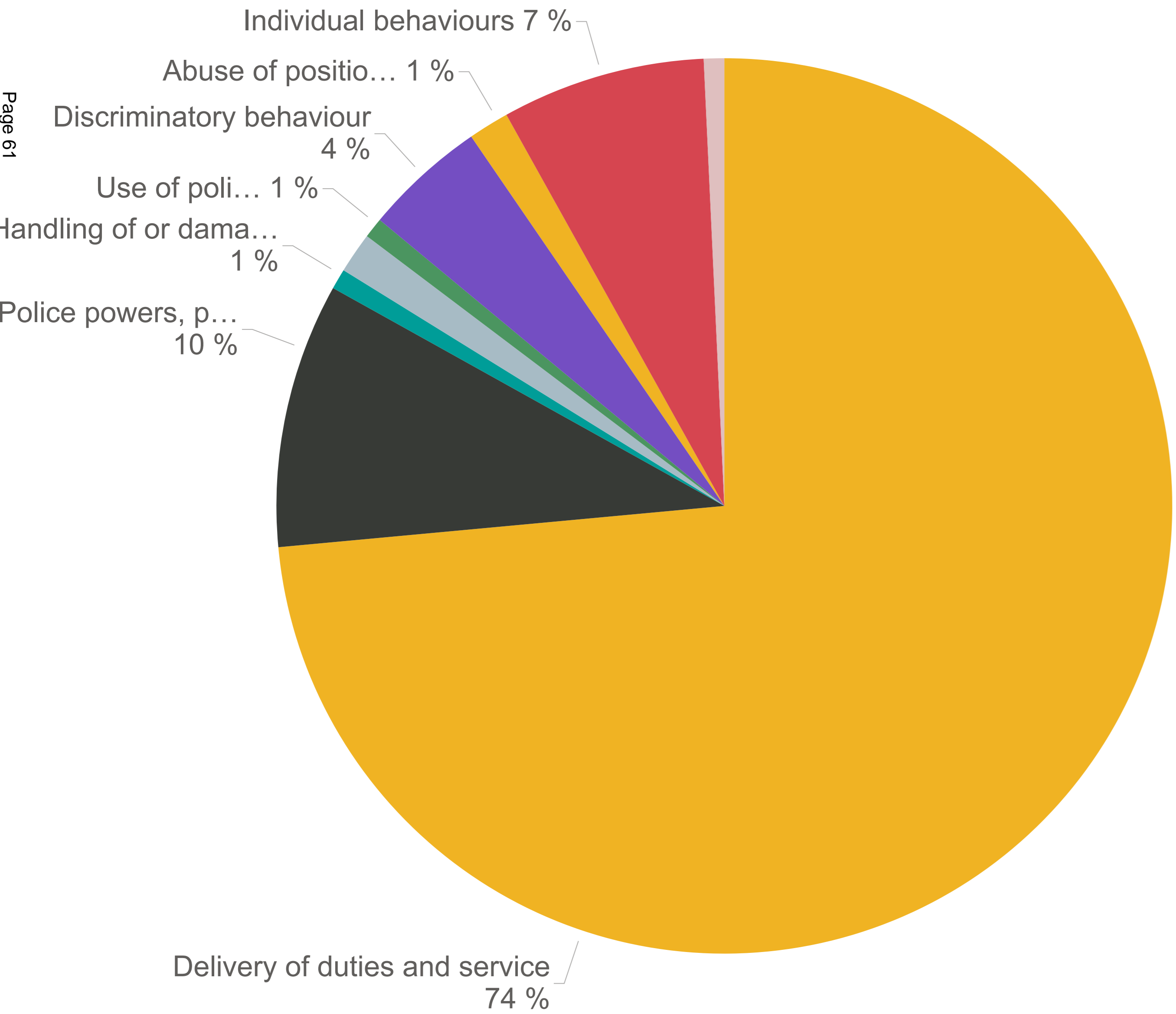
Section A1.3: Allegations logged – what has been complained about (YTD)

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

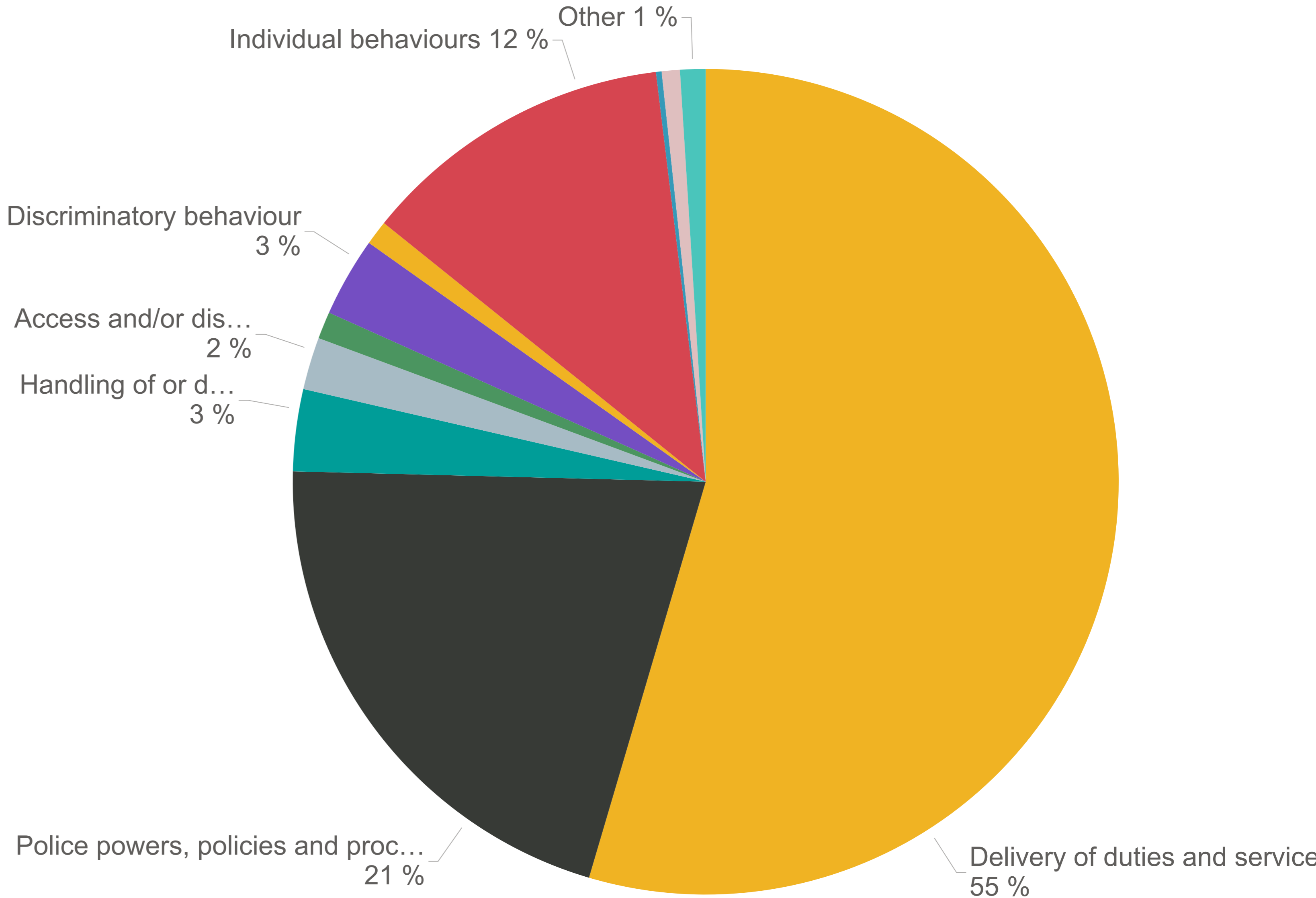
What has been complained about (YTD)

Year to date	Delivery of duties and service	Police powers, policies and procedures	Handling of or damage to property/ premises	Access and/or disclosure of information	Use of police vehicles	Discriminatory behaviour	Abuse of position/ corruption	Individual behaviours	Sexual conduct	Discreditable conduct	Other	Total
Force	100	13	1	2	1	6	2	10	0	1	0	136
SPLY	66	18	4	1	2	3	1	13	0	4	1	113
National	21,535	8,225	1,265	809	419	1,225	378	4,853	87	280	393	39,469

What has been complained about (force - year to date)



What has been complained about (national - year to date)



Section A1.4: Allegations logged – Top five allegation categories and their sub-categories (Year to date)

Category	Year to date Subcategory	Force		SPLY		National		
		No.	%	No.	%	No.	%	
Delivery of duties and service	Total	100	74 %	66	58 %	21,534	55 %	
	Police action following contact	76	76 %	48	73 %	8,745	41 %	
	Information	13	13 %	3	5 %	2,468	11 %	
	General level of service	11	11 %	12	18 %	7,280	34 %	
	Decisions	0	0 %	3	5 %	3,041	14 %	
Police powers, policies and procedures	Total	13	10 %	18	16 %	8,223	21 %	
	Stops, and stop and search	3	23 %	2	11 %	386	5 %	
	Power to arrest and detain	3	23 %	4	22 %	1,454	18 %	
	Searches of premises and seizure of property	2	15 %	2	11 %	1,035	13 %	
	Use of force	2	15 %	7	39 %	2,145	26 %	
	Evidential procedures	2	15 %	0	0 %	638	8 %	
	Out of court disposals	1	8 %	0	0 %	135	2 %	
	Detention in police custody	0	0 %	3	17 %	1,145	14 %	
	Bail, identification and interview procedures	0	0 %	0	0 %	485	6 %	
	Other policies and procedures	0	0 %	0	0 %	800	10 %	
	Individual behaviours	Total	10	7 %	13	12 %	4,853	12 %
		Impolite language / tone	9	90 %	0	0 %	1,190	25 %
		Impolite and intolerant actions	1	10 %	0	0 %	727	15 %
Unprofessional attitude and disrespect		0	0 %	13	100 %	1,338	28 %	
Lack of fairness and impartiality		0	0 %	0	0 %	686	14 %	
Overbearing or harassing behaviours		0	0 %	0	0 %	912	19 %	
Discriminatory behaviour	Total	6	4 %	3	3 %	1,225	3 %	
	Race	5	83 %	3	100 %	549	45 %	
	Disability	1	17 %	0	0 %	224	18 %	
	Age	0	0 %	0	0 %	18	1 %	
	Gender reassignment	0	0 %	0	0 %	15	1 %	
	Marriage and civil partnership	0	0 %	0	0 %	2	0 %	
	Pregnancy and maternity	0	0 %	0	0 %	0	0 %	
	Religion or belief	0	0 %	0	0 %	28	2 %	
	Sex	0	0 %	0	0 %	211	17 %	
	Sexual orientation	0	0 %	0	0 %	44	4 %	
Access and/or disclosure of information	Total	2	1 %	1	1 %	809	2 %	
	Disclosure of information	1	50 %	0	0 %	547	68 %	
	Handling of information	1	50 %	0	0 %	163	20 %	
	Decisions	0	0 %	0	0 %	0	0 %	
	Use of police systems	0	0 %	1	100 %	68	8 %	
	Accessing and handling of information from other sources	0	0 %	0	0 %	30	4 %	
Abuse of position/ corruption	Total	2	1 %	1	1 %	378	1 %	
	Abuse of position for financial purpose	1	50 %	0	0 %	21	6 %	
	Abuse of position for other purpose	1	50 %	0	0 %	113	30 %	
	Abuse of position for sexual purpose	0	0 %	1	100 %	13	3 %	

This section presents the three most commonly recorded categories for allegations that have been logged. A complaint case will contain one or more allegations and one category (and sub-category, where available) is selected for each allegation logged.

Total % is of the total number of allegations logged. Allegations where the subcategory is 'none' are omitted from this table.

Section A1.5: National complaint factors

Year to date Factors on all allegations	Force		SPLY		National	
	Allegations Logged	% Allegations Logged	Allegations Logged	% Allegations Logged	Allegations Logged	% Allegations Logged
Fraud	92	68 %	58	51 %	249	1 %
Roads/traffic	15	11 %	0	0 %	2,358	6 %
Investigation	13	10 %	4	4 %	14,194	36 %
Arrest	8	6 %	6	5 %	4,881	12 %
None	4	3 %	28	25 %	7,961	20 %
Call Handling	1	1 %	0	0 %	1,621	4 %
Custody	1	1 %	3	3 %	2,207	6 %
Domestic / gender abuse	1	1 %	0	0 %	2,010	5 %
Stop and/or search	1	1 %	2	2 %	804	2 %
Child protection / CSA / CSE	0	0 %	0	0 %	687	2 %
Coronavirus - other	0	0 %	0	0 %	0	0 %
Coronavirus - police powers on infectiou	0	0 %	0	0 %	0	0 %
Coronavirus - police powers on restricti	0	0 %	0	0 %	0	0 %
Covert policing	0	0 %	0	0 %	18	0 %
Death	0	0 %	0	0 %	351	1 %
Drugs / alcohol	0	0 %	0	0 %	442	1 %
Firearms	0	0 %	1	1 %	196	0 %
Hate Crime	0	0 %	0	0 %	252	1 %
Mental health	0	0 %	1	1 %	1,083	3 %
Missing persons	0	0 %	0	0 %	255	1 %
Neighbourhood policing	0	0 %	0	0 %	1,815	5 %
Police dogs or horses	0	0 %	0	0 %	16	0 %
Prejudicial and improper behaviour	0	0 %	0	0 %	0	0 %
Premises search	0	0 %	3	3 %	941	2 %
Public order incident	0	0 %	0	0 %	296	1 %
Restraint equipment	0	0 %	3	3 %	365	1 %
Serious injury	0	0 %	0	0 %	93	0 %
Social media	0	0 %	0	0 %	170	0 %
Taser	0	0 %	0	0 %	43	0 %
Unknown	0	0 %	0	0 %	8	0 %
VAWG' - dissatisfaction handling	0	0 %	0	0 %	8	0 %
VAWG - dissatisfaction handling	0	0 %	1	1 %	1,405	4 %
VAWG - police perpetrated	0	0 %	1	1 %	304	1 %
VAWG' - police victim	0	0 %	0	0 %	9	0 %
VAWG - police victim	0	0 %	0	0 %	61	0 %

This section presents information that shows the situational context of the dissatisfaction expressed in a complaint.

Each allegation should have a single category selected. However, multiple factors can be selected on a single allegation. Therefore, the sum of factors will not equal the total allegations logged in each category and the percentages here will add up to over 100%. Please refer to our [Guidance on capturing data about police complaints](#) for definitions of categories and factors.

Section A1.6: National complaint factors on top five allegation categories

Factors on top five allegation categories (Year to date)	Delivery of duties and service	Police powers, policies and procedures	Access and/or disclosure of information	Discriminatory behaviour	Abuse of position/corruption	Individual behaviours
Stop and/or search	0	1	0	0	0	0
Roads/traffic	0	8	0	3	0	2
None	1	0	0	0	0	3
Investigation	9	0	0	2	0	2
Fraud	89	0	1	0	1	1
Custody	0	0	0	0	0	1
Call Handling	0	0	0	0	0	1
Arrest	0	4	1	2	1	0
Total	99	13	2	6	2	10

This section presents information that shows what people are complaining about using a combination of allegation categories and factors against the police force.

Categories capture the root of the dissatisfaction expressed in a complaint. Factors capture the situational context of the dissatisfaction expressed in a complaint.

The combination of categories and factors provides a richer picture of what people are complaining about compared to the categories alone.

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

The table below shows a breakdown of allegations logged with the focus national complaint factors.

IOPC Police Data Year Quarter	VAWG - dissatisfaction handling	VAWG - police perpetrated	VAWG - police victim	Total
Q1 23/24	1	1	0	2
Q2 23/24	0	1	0	1
Total	1	2	0	3

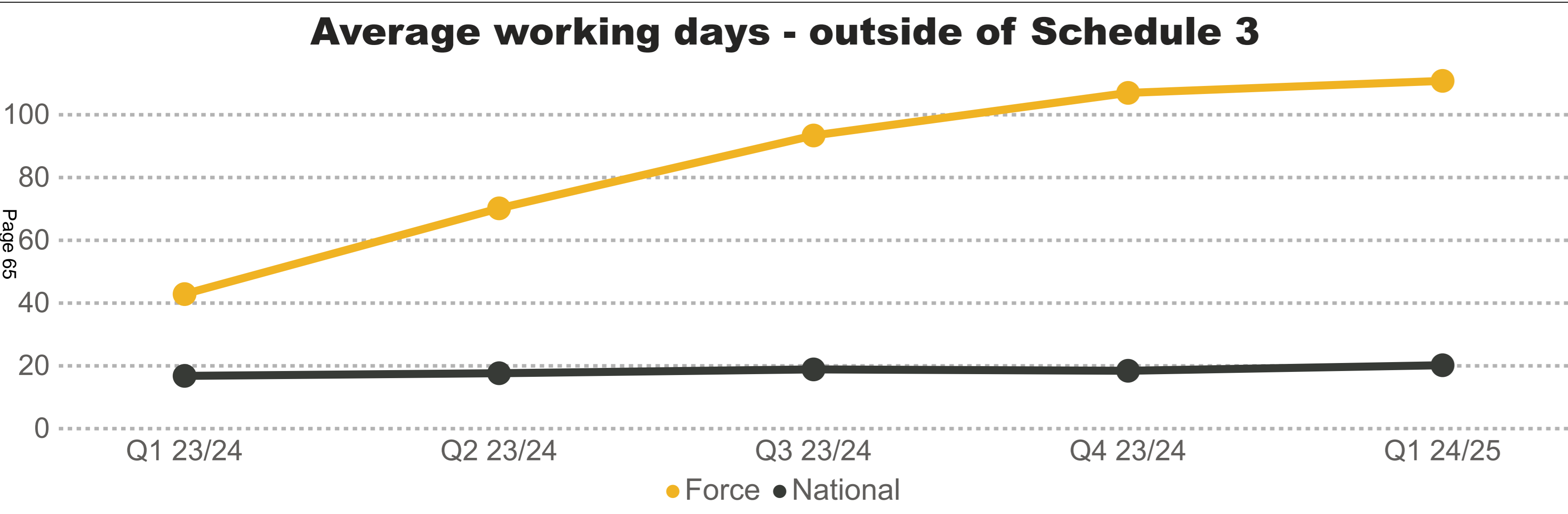
Section A2: Allegations timeliness

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

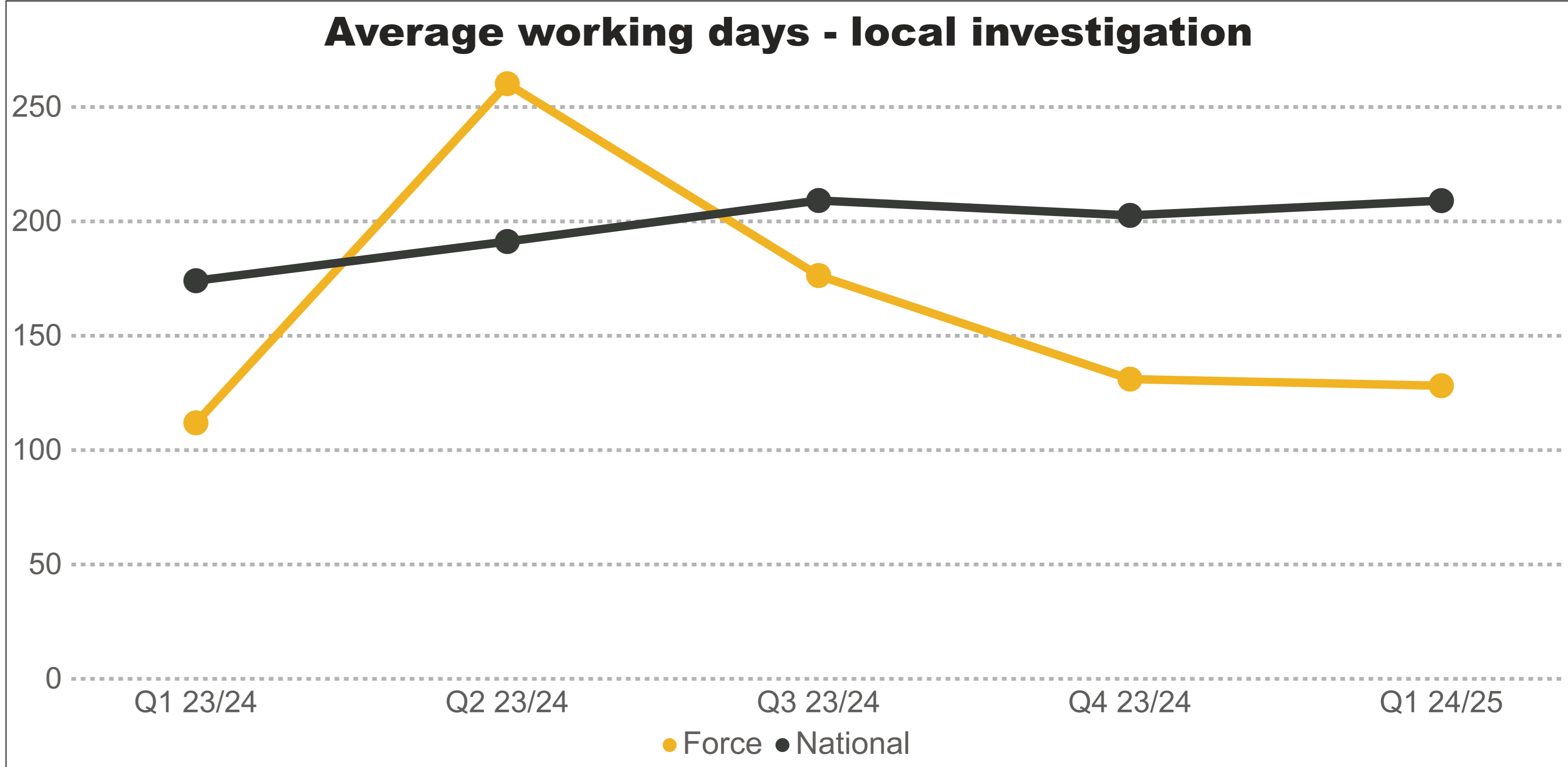
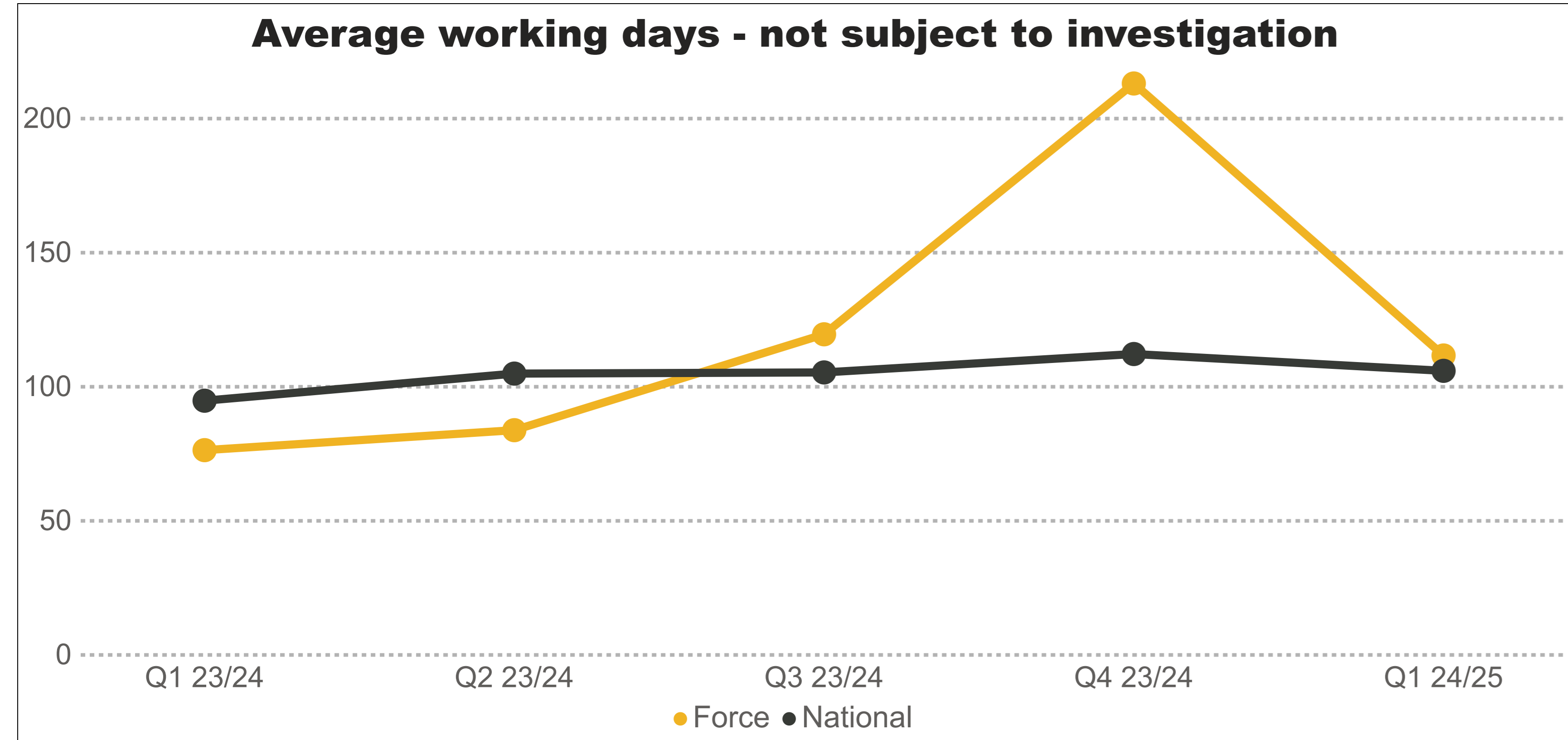
Independent investigation figures do not include conduct or death/serious injury investigations which are also investigated by the IOPC.

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

Year to date Allegations	Outside of Schedule 3		Under Schedule 3 - not subject to investigation		Under Schedule 3 - by local investigation		Under Schedule 3 - by independent investigation	
	Number Finalised	Average days	Number Finalised	Average days	Number Finalised	Average days	Number Finalised	Average days
Force	92	111	16	112	18	128	0	0
SPLY	57	43	15	76	11	112	0	0
National	16,487	20	17,104	105	4,492	208	23	360



Year to date Allegations	Under Schedule 3 - by directed investigation	
	Number Finalised	Average days
Force	0	0
SPLY	0	0
National	12	619



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

This section presents a breakdown of how allegations were handled information and the decisions being given. An allegation decision is logged for each allegation finalised. The allegation decision reflects how the complaint case has been handled, with different decisions available for the different means of handling. Both the allegation decisions and the subsequent actions available will depend on two things: firstly, whether the complaint case has been handled outside or under Schedule 3; and secondly, the means of handling where it has been dealt with under Schedule 3. Please refer to our [Guidance on capturing data about police complaints](#) for details of allegation decisions.

How allegations were handled (Year to date)	Force No.	Force %	MSF Average No.	MSF Average %	National No.	National %
Under Schedule 3 investigated (not subject to special procedures)	16	13 %			4,102	11 %
Under Schedule 3 investigated (subject to special procedures)	2	2 %			425	1 %
Under Schedule 3 - not investigated	16	13 %			17,104	45 %
Outside of Schedule 3	92	73 %			16,487	43 %
Total	126	100 %			38,118	100 %

Force: percent of allegations finalised by handling method

Handling Method ● Outside of Schedule 3 ● Under Schedule 3 - not investigated ● Under Schedule 3 investigated (subject to special procedures) ● Under Schedule 3 investigated (not subject to special procedures)



How allegations were handled (Year to date)	Outside of Schedule 3				Under Schedule 3 - not investigated				Under Schedule 3 investigated (subject to special procedures)				Under Schedule 3 investigated (not subject to special procedures)			
	Force No.	Force %	National No.	National %	Force No.	Force %	National No.	National %	Force No.	Force %	National No.	National %	Force No.	Force %	National No.	National %
No further action				0 %	2	13 %	1,340	4 %			4	0 %	1	6 %	124	0 %
Regulation 41 applies				0 %			31	0 %			1	0 %			45	0 %
Service provided - unable to determine				0 %			1,503	4 %			4	0 %			381	1 %
Service provided - not acceptable				0 %	1	6 %	2,230	6 %			14	0 %			471	1 %
Service provided - acceptable				0 %	13	81 %	11,528	30 %			44	0 %	15	94 %	2,928	8 %
Not Resolved	8	9 %	930	2 %				0 %				0 %				0 %
Resolved	84	91 %	15,557	41 %				0 %				0 %				0 %
No Case to Answer				0 %				0 %	2	100 %	255	1 %				0 %
Case to Answer				0 %				0 %			90	0 %				0 %
Withdrawal				0 %			471	1 %			13	0 %			153	0 %
Total	92	73 %	16,487	43 %	16	13 %	17,103	45 %	2	2 %	425	1 %	16	13 %	4,102	11 %

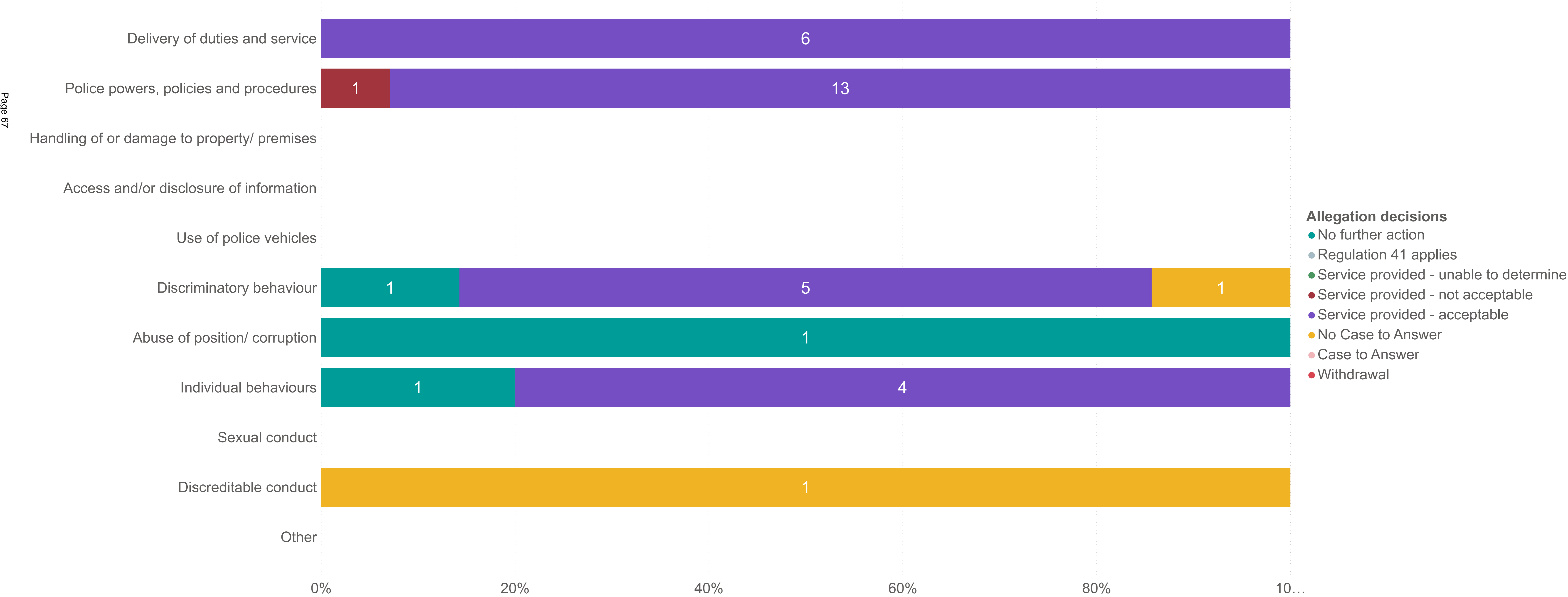
Section A3.2: Allegation decisions by what was complained about (Year to date by category)

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

Outside Schedule 3 allegation decisions

Allegation decisions	Delivery of duties and service	Police powers, policies and procedures	Handling of or damage to property/ premises	Access and/or disclosure of information	Use of police vehicles	Discriminatory behaviour	Abuse of position/ corruption	Individual behaviours	Sexual conduct	Discreditable conduct	Other	Total
Resolved	63	8	4	1	1	2	1	4	0	0	0	84
Not Resolved	6	1	0	0	0	1	0	0	0	0	0	8

Schedule 3 allegation decisions



Section B1.1: Allegation actions - on allegations handled outside of Schedule 3 (Year to date)

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

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

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

Actions following outside of Schedule 3 complaint cases	Force		SPLY		National	
	Allegations Finalised	% Allegations Finalised	Allegations Finalised	% Allegations Finalised	Allegations Finalised	% Allegations Finalised
Organisational learning	1	1 %	0	0 %	69	0 %
Learning from reflection	0	0 %	1	2 %	460	3 %
Policy review	0	0 %	0	0 %	16	0 %
Goodwill gesture	0	0 %	0	0 %	16	0 %
Apology	2	2 %	0	0 %	1,689	10 %
Debrief	0	0 %	0	0 %	155	1 %
Explanation	76	83 %	51	89 %	10,008	61 %
No further action	12	13 %	5	9 %	1,776	11 %
Other action	1	1 %	0	0 %	1,954	12 %

Section B1.2: Allegation actions - on allegations handled under Schedule 3 (Year to date)

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

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

All complaint cases handled under Schedule 3

Actions following Schedule 3 complaint cases	Force		SPLY		National	
	Allegations Finalised	% Allegations Finalised	Allegations Finalised	% Allegations Finalised	Allegations Finalised	% Allegations Finalised
Organisational learning	1	3 %	0	0 %	202	1 %
Apology	0	0 %	5	19 %	744	3 %
Debrief	0	0 %	0	0 %	513	2 %
Explanation	15	44 %	9	35 %	13,366	62 %
Unsatisfactory Performance Procedure (UPP)	0	0 %	0	0 %	5	0 %
No further action	18	53 %	10	38 %	4,931	23 %
Other action	0	0 %	1	4 %	168	1 %
Learning from reflection	0	0 %	0	0 %	1,178	5 %
Referral to RPRP	0	0 %	1	4 %	327	2 %

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

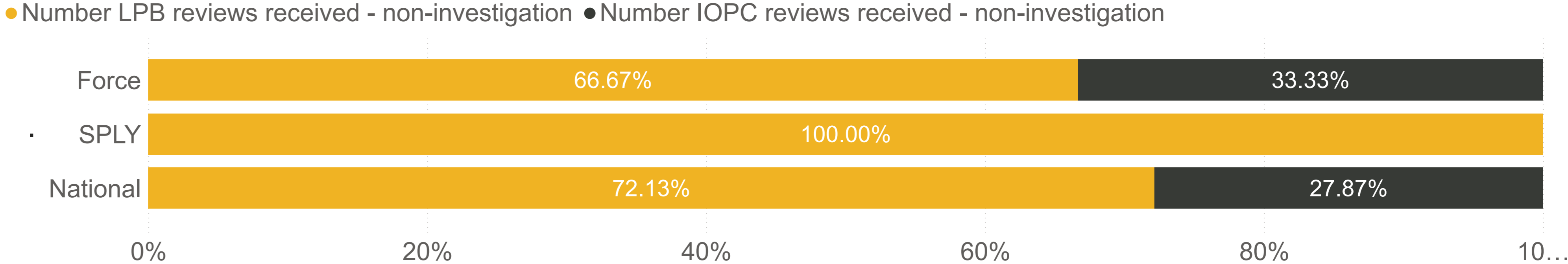
Complaint cases handled under Schedule 3 that are investigated and subject to Special Procedures can result in misconduct proceedings

Actions following Schedule 3 (special procedures) cases	Force		SPLY		National	
	Allegations Finalised	% Allegations Finalised	Allegations Finalised	% Allegations Finalised	Allegations Finalised	% Allegations Finalised
Misconduct proceedings	0	0 %	0	0 %	39	9 %
Unsatisfactory Performance Procedure (UPP)	0	0 %	0	0 %	2	0 %
Other actions following a case to answer decision	0	0 %	0	0 %	45	11 %
Referral to RPRP	0	0 %	0	0 %	81	19 %

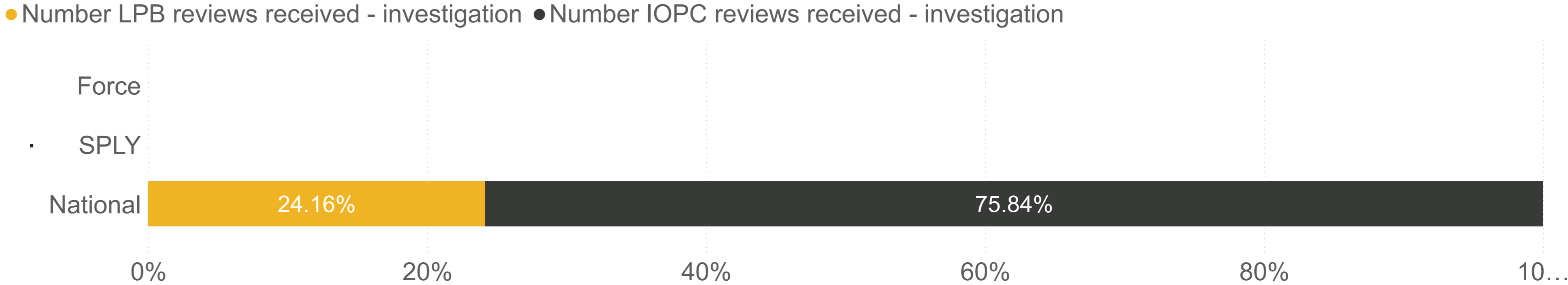
Section C1: Reviews received and timeliness (Year to date)

This section presents data on the number of reviews received about this force by the IOPC and by the local policing body. The charts enable you to see the proportion of each review type being received by the two bodies. For information on when the IOPC should be the review body, please see our [Statutory Guidance](#)

Non-investigation reviews received	LPB	IOPC
Force	2	1
SPLY	1	0
National	893	345



Investigation reviews received	LPB	IOPC
Force	0	0
SPLY	0	0
National	79	248

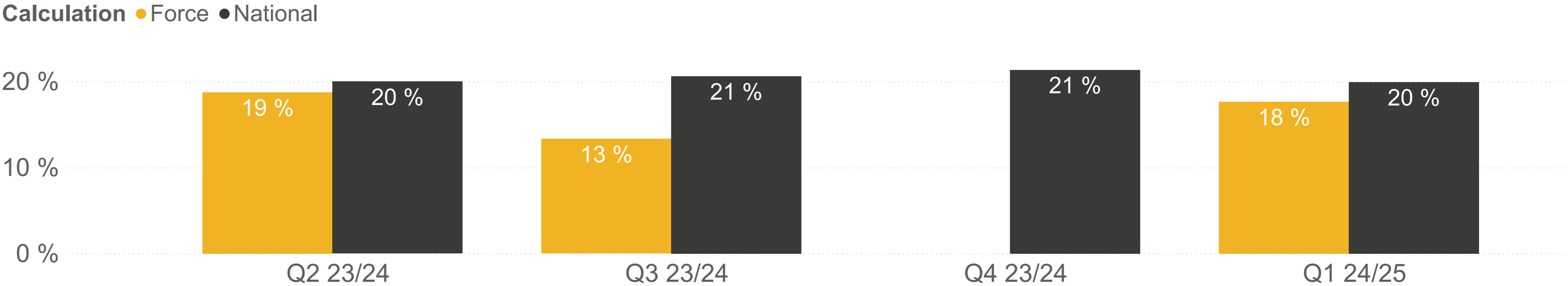


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Complaints are not finalised until after any reviews are completed. However, this measure helps to provide an indication of how often reviews are made in comparison to the number of complaints completed.

	Reviews received	Schedule 3 complaints finalised
Force	3	17
SPLY	1	8
National	1,565	7,851

Reviews received as a proportion of Schedule 3 cases



	Force	SPLY	National
Average number of working days to complete Local Policing Body reviews	0	14	55
Average number of working days to complete IOPC reviews	39	0	141

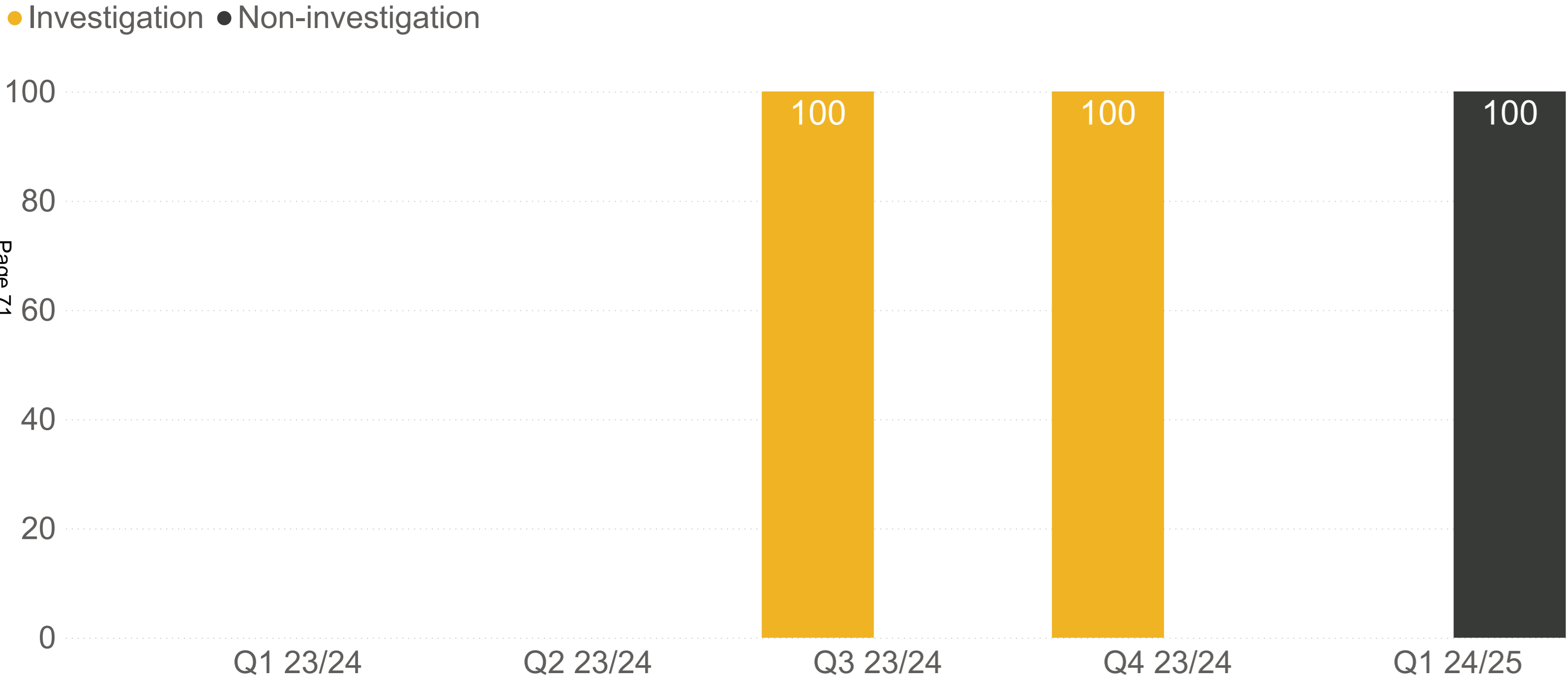
Section C2: Outcomes on reviews

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

Investigation reviews (YTD)	Completed investigation (IOPC)	Upheld investigation (IOPC)	Completed investigation (LPB)	Upheld investigation (LPB)
Force	0	0	0	
SPLY	0	0	0	
National	221	68	67	9

Non-investigation reviews (YTD)	Completed non-investigation (IOPC)	Upheld non-investigation (IOPC)	Completed non-investigation (LPB)	Upheld non-investigation (LPB)
Force	1	1	0	
SPLY	0	0	1	
National	225	79	849	156

% IOPC reviews upheld - Force



% LPB Reviews upheld - Force



Section D1: Complaint cases finalised under Schedule 3 - timeliness

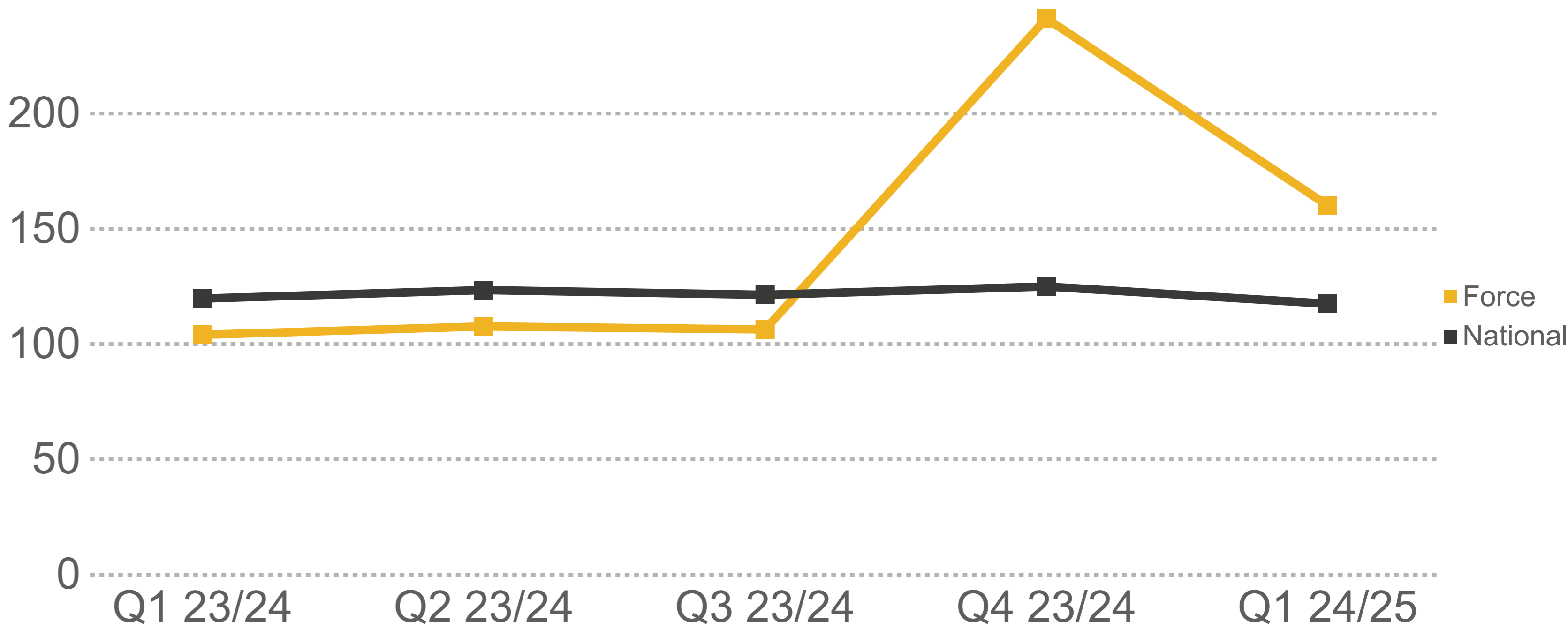
This section shows the time it takes the force to finalise complaint cases from the customer's perspective. It gives a breakdown of the time taken to finalise complaint cases handled formally under Schedule 3. Timeliness is calculated from the date the complaint was made. On cases under Schedule 3, the below figures include the time a case may spend suspended due to criminal matters.

Complaint cases with 'invalid dates' have been removed from the data shown. Please refer to the [IOPC website](#) performance framework counting rules and calculations on the for an explanation of invalid dates. For more information on the proportion of complaints handled under each method (along with outside if Schedule 3) please see page 14

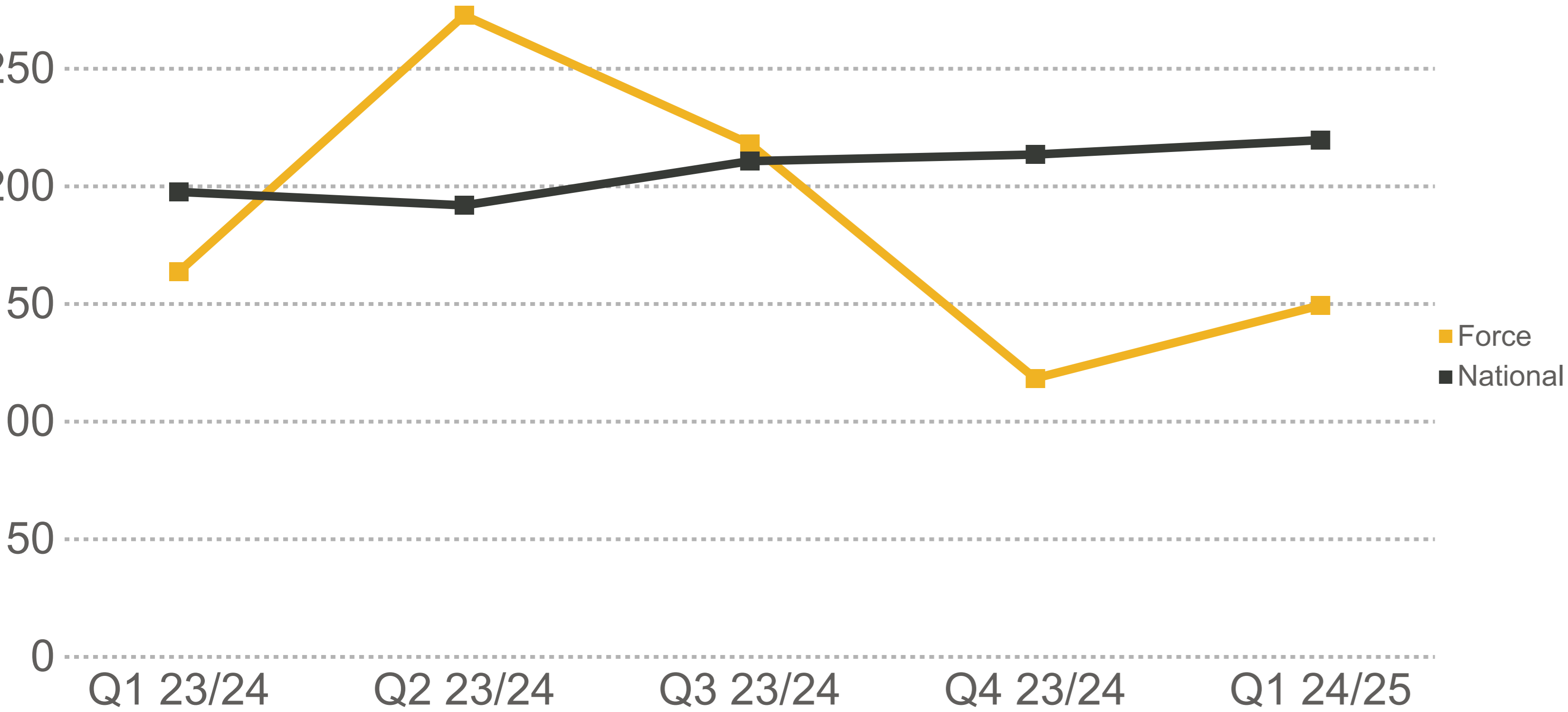
Average working days to finalise (Year to date)	Force	SPLY	National
Under Schedule 3 investigated (subject to special procedures)	119	0	308
Under Schedule 3 investigated (not subject to special procedures)	149	164	219
Under Schedule 3 - not investigated	160	104	117
Total	153	119	140

Number finalised (Year to date)	Force	SPLY	National
Under Schedule 3 - not investigated	11	6	6,264
Under Schedule 3 investigated (not subject to special procedures)	4	2	1,416
Under Schedule 3 investigated (subject to special procedures)	2		171
Total	17	8	7,851

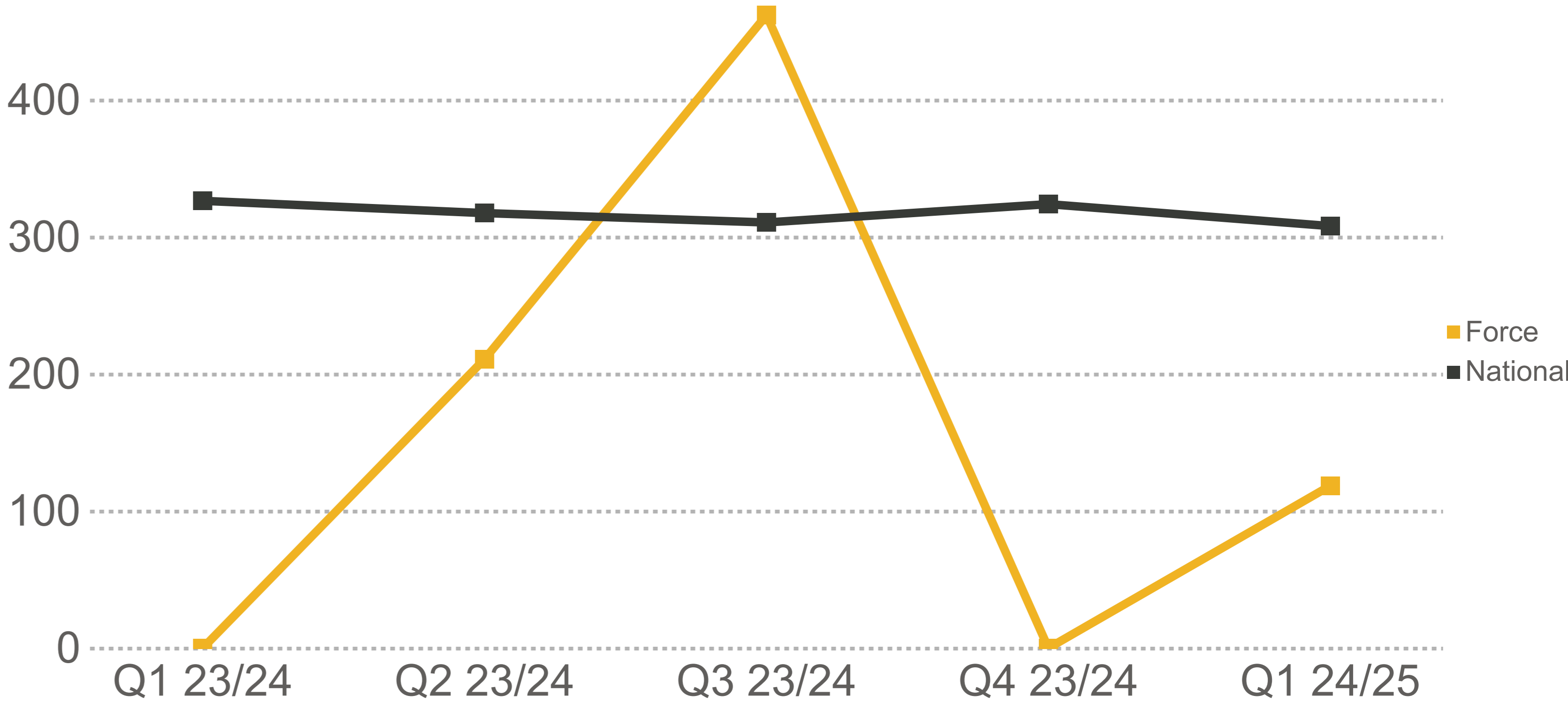
Schedule 3 - Not investigated



Schedule 3 - Investigated (not special procedures)



Schedule 3 - Investigated (special procedures)



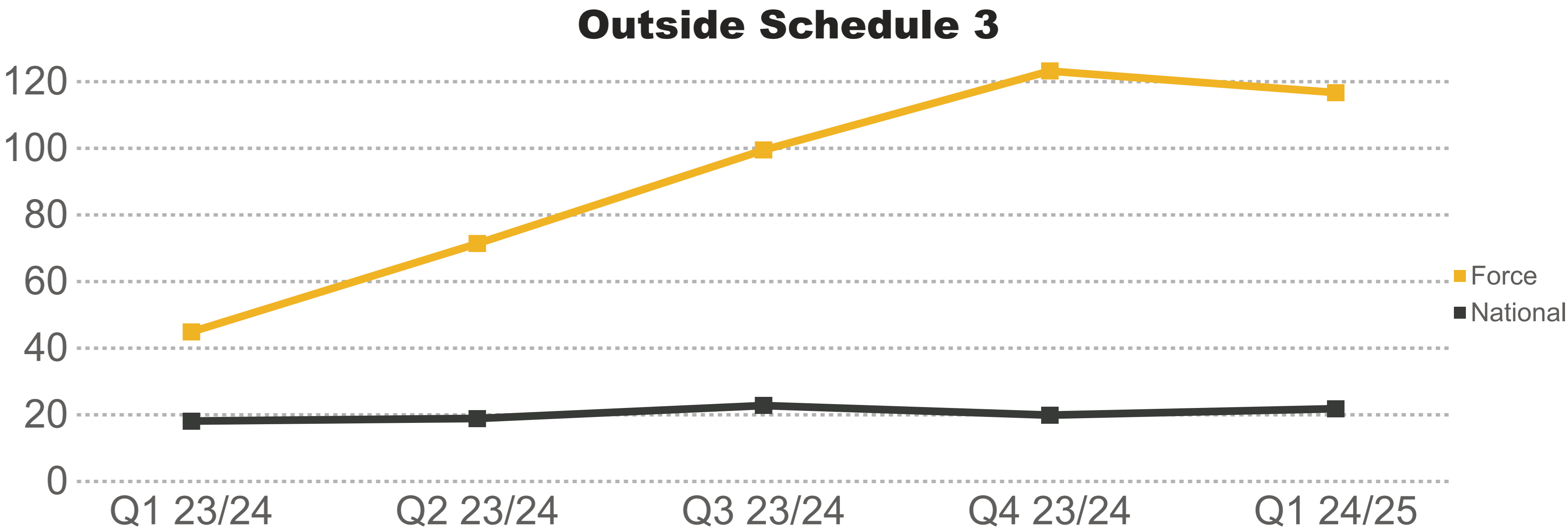
Section D2: Complaint cases finalised outside of Schedule 3 - timeliness

This section shows the time it takes the force to finalise complaint cases from the customer's perspective. It gives a breakdown of the time taken to finalise complaint cases handled formally under Schedule 3. Timeliness is calculated from the date the complaint was made. On cases under Schedule 3, the below figures include the time a case may spend suspended due to criminal matters.

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

Year to date

	Force	SPLY	National
Complaint cases handled outside of Schedule 3	87	50	13766
Average days to finalise complaint cases handled outside of Schedule 3	117	45	22



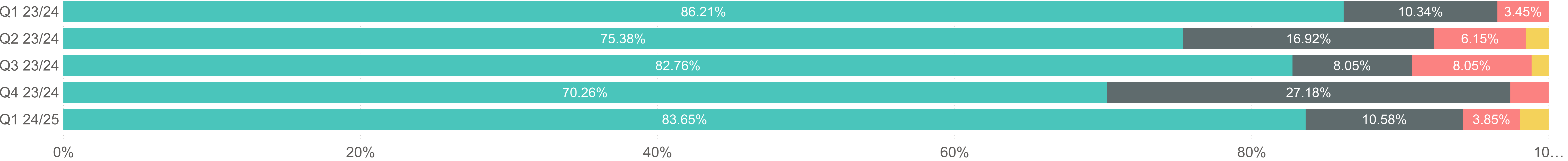
Section D3: How complaint cases handled

This section shows the proportion of complaint cases handled by the force, most similar for group and nationally under each method of handling. The table covers data recorded in the period as per 'Reporting Period' above, while the below chart concerns the force only using the last four quarters of available data.

Means Of Handling	Force		SPLY		National	
	Complaints Finalised	% Finalised	Complaints Finalised	% Finalised	Complaints Finalised	% Finalised
Outside of Schedule 3	87	84%	50	86%	13,766	64%
Under Schedule 3 - not investigated	11	11%	6	10%	6,264	29%
Under Schedule 3 investigated (not subject to special procedures)	4	4%	2	3%	1,416	7%
Under Schedule 3 investigated (subject to special procedures)	2	2%			171	1%
Total	104	100%	58	100%	21,617	100%

Force: percent of complaint cases finalised by handling method

Means Of Handling ● Outside of Schedule 3 ● Under Schedule 3 - not investigated ● Under Schedule 3 investigated (not subject to special procedures) ● Under Schedule 3 investigated (subject to special procedures)



Section E: Referrals

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

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

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

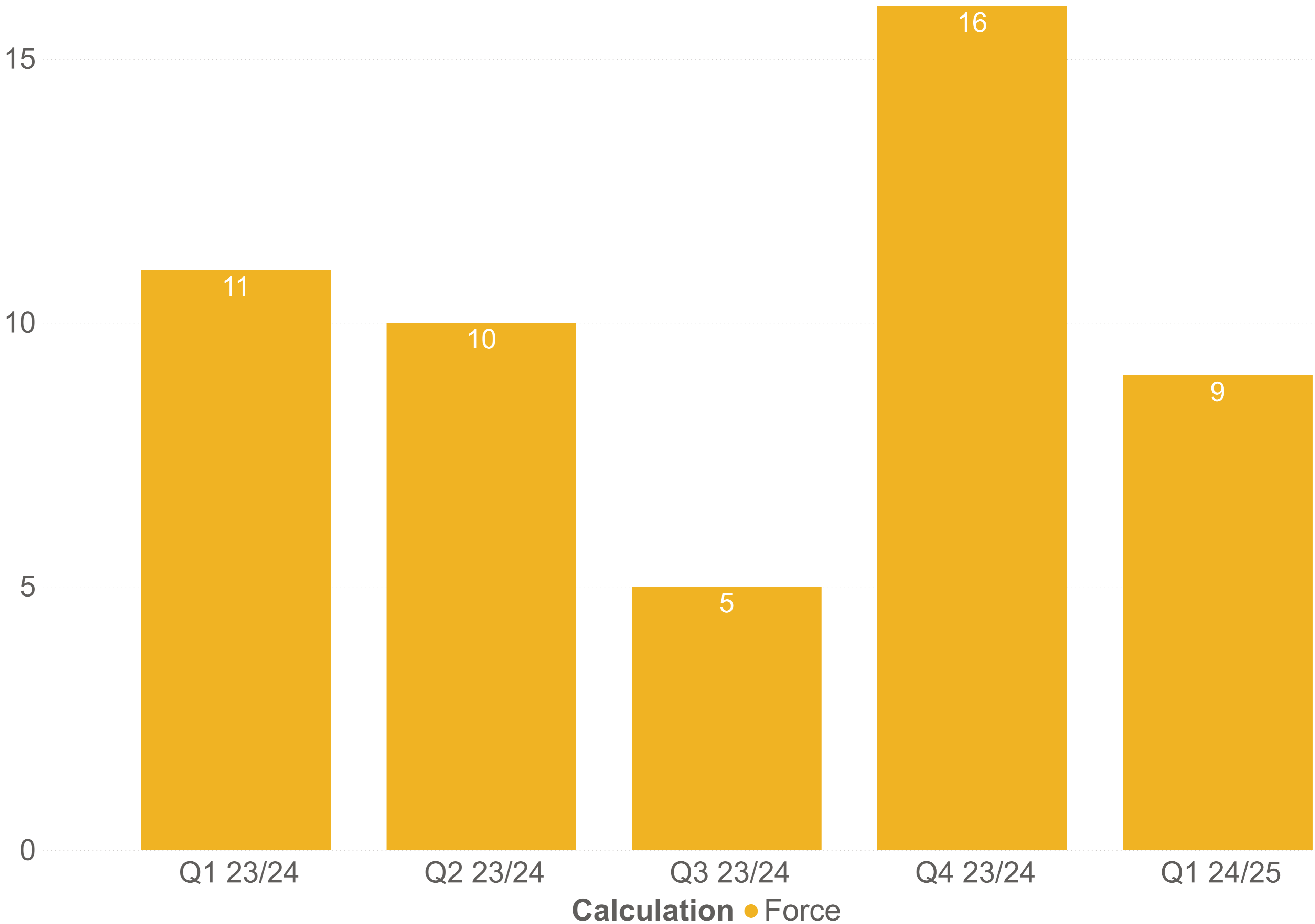
Where a referral is made by the force on a mandatory basis but does not meet the mandatory referral criteria, the matter may not fall within the IOPC’s remit to assess and will be determined invalid.

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

Year to date

	Force	SPLY	National
Number referrals received	9	11	1,753
Number referrals completed	14	8	1,725
Decision: Independent Investigation	3	1	110
Decision: Directed Investigation	0	0	4
Decision: Local Investigation	8	6	966
Decision: Return to Force	2	1	611
Decision: Invalid	1	0	34

Force and MSF Group referrals received



Most Similar Force (MSF) Group:

Notes

Data sources

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

Performance Framework counting rules and calculation

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

Data constraints

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

Further Information

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

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<u>Hospitality Item</u>	<u>Location type</u>	<u>Directorate</u>	<u>Date</u>	<u>Estimated Value</u>	<u>Status</u>	<u>CoLP Participant(s)</u>	<u>Disposal of Gifts</u>	<u>External Organisation</u>	<u>Line Manager</u>	<u>Rationale for Acceptance/Decline</u>	<u>Full description of Gift/Hospitality</u>	<u>Location details</u>
Invitation from the US Embassy to attend Independence Day celebrations	Foreign embassy	National Lead Force Operations	24/06/2024	£50.00	Accepted by the force	Matthew Bradford	Not applicable	US Embassy official, Tim Hemker (HSI)	Oliver Shaw	Ongoing and recent engagement with US Embassy officials in Homeland Security and Investigations together with our deployment of an officer in New York, US as part of the El Dorado Taskforce - a unit in HSI.	The Honorable Ambassador Jane Hartley of the Embassy of the United States of America requests the company of Mr. Matthew Bradford to celebrate the 248th anniversary of the Independence of the United States of America ☆☆☆ Monday, June 24, 2024 7:45 – 10:30 P.M.	Winfield House Outer Circle, Regent's Park, London NW1 4RT
Box of Ben Le Provest chocolates	Livery Hall	National Lead Force Operations	13/06/2024	£9.00	Accepted by the force	Simon Klust	Retained by Officer	GIICS	Thomas Hill	I provided a speech / participated in a panel discussion at the Stationers Hall for the GIICS (which represents FCA style bodies from mainly Commonwealth / British Overseas Territories). This small box of chocolates was handed to all speakers. Manufacturers website has a RRP of £9.00 for the item.	Box of chocolates.	N/A
Gin glass	Emergency Services Premises	National Lead Force Operations	07/06/2024	£10.00	Accepted by the force	Stacie Cottrell	Retained by Office	From victim of crime	Philip Corcoran	Victim of crime wanted to give me a gift for my hard work following three year investigation - 21*7511	Ginology Glassware and a thank you card.	Given to me by victim

Lunch	Livery Hall	Local Policing	05/06/2024	£130.00	Accepted by the force	Rob Atkin	Not applicable	Worshipful Company of Security Professionals	Umer Khan	The Commissioner is a honorary Liverman of this Livery Company. The event was not only a lunch but had key speakers in relation to national and international security and an opportunity to meet key partners contributing to safety and security of the City of London	The Worshipful Company of Security Professionals Instalation lunch for the new master. Asked to attend by the Commissioner's Office to represent the force	Drapers Hall
Lunch	Livery Hall	Corporate Services	24/05/2024	£100.00	Accepted by the force	Patrick Holdaway	Not applicable	Primera	Alix Newbold	Primera operate the 5 BIDs across the City and are an important partner.	I have been invited to the AGM of the City of London Crime Prevention Association, which will include lunch. This is a good networking event.	Vintners Hall
lunch	Livery Hall	Local Policing	24/05/2024	£60.00	Accepted by the force	Rob Atkin	Not applicable	Crime Prevention Association	Umer Khan	This was attended as lead for Local Policing along with the Assistant Commissioner Paul Betts. Lunch was accepted as part of the event as involved startegic partner networking and conversations.	City Crime Prevention Association AGM followed by sit down lunch	Vinters Hall EC1

Hotel and dinner	Hotel	Corporate Services	14/05/2024	£150.00	Accepted by the force	Patrick Holdaway	Not applicable	ORIS Forums	Alix Newbold	This is an annual event which allows me to engage with over 180 business contacts.	I have been asked to present and lead a series of workshops at a business conference, as such the organisers have paid for my hotel room and the meals, which are included as part of the conference.	Old Thorns, Liphook, Hampshire
Dinner	Restaurant	Corporate Services	14/05/2024	£80.00	Accepted by the force	Anthony Fletcher	Not applicable	Motorola Solutions	Gary Brailsford-Hart	Pronto Q1 service review Motorola representatives attended CoLP from glasgow. Meetings and discussion continued into evening. Forms part of our relationship with the current supplier and provided an opportunity to learn about new products and plan future developmental work	Dinner (Food Only) Pronto Q1 service review Motorola representatives attended CoLP from glasgow. Meetings and discussion continued into evening. Forms part of our relationship with the current supplier and provided an opportunity to learn about new products and plan future developmental work	Bodeans, 16 Byward Street, London EC3 5BA
Meal	Office premises (external organisation)	Corporate Services	09/05/2024	£75.00	Not Accepted by the force	Patrick Holdaway	Not applicable	Part of Keep Up Consultancy Ltd.	Alix Newbold	Refused. I will be on leave so unable to attend.	Offer of a meal at the BT Tower as part of a fund raising event.	BT Tower, London.
Buffet lunch	Concert hall/arena/cinema	Corporate Services	25/04/2024	£10.00	Accepted by the force	Patrick Holdaway	Not applicable	Nineteen Events	Alix Newbold	As a speaker I had access to the speakers lounge who offered a small buffet.	Lunch at the Retail Technology show	Olympia

Dinner	Hotel	Corporate Services	17/04/2024	£200.00	Accepted by the force	Patrick Holdaway	Not applicable	Smoke Screens	Alix Newbold	It was a good networking event.	This was a dinner following a retail crime conference. There was a spare seat at a table which was offered to me by a supplier.	Novotel, Hammersmith London.
Dinner	Hotel	Corporate Services	17/04/2024	£100.00	Accepted by the force	Patrick Holdaway	Not applicable	Retail Risk	Alix Newbold	This is a regular event used to network with senior retail leads.	Known as the Director's Dinner this is a pre conference dinner with senior retailers to meet and discuss work issues and the retail crime conference the next day.	Haymarket Hotel, London.

Appendix 3 - PUBLIC

Chief Officer Team (COT) Membership of Groups

The City of London Police has seven permanent members of their Chief Officer team, due to temporary vacancies, this equates to an additional two members supporting vacant positions. All nine members have positively confirmed whether they do or do not have membership to an external organisation.

<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	Commander	Nik Adams	London Cyber Resilience Centre	Non-Exec Director
7	17/05/2024	T/Commissioner	Pete O'Doherty	London Cyber Resilience Centre	Non-Exec Director

8	17/05/2024	T/ Commissioner	Pete O'Doherty	Sprite Plus Advisory Board (Academic Working Group)	Member
9	17/05/2024	T/Commissioner	Pete O'Doherty	Abertay cyber Quarter, Abertay University	Advisor
10	17/05/2024	T/Commissioner	Pete O'Doherty	Royal Humane Society	Panel Member
11	10/09/2024	Chief Operating Officer	Alix Newbold	Negative / No Organisations	N/A
12	10/09/2024	Chief Finance Officer	Alistair Cook	School	Parent Governor
13	10/09/2024	Chief Finance Officer	Alistair Cook	Bursary Trust	Governor
14	10/09/2024	Chief Finance Officer	Alistair Cook	Church	Trustee and Treasurer
15	11/09/2024	Chief Finance Officer	Alistair Cook	Chartered Institute of Public Finance & Accountancy (CIPFA)	Professional Member (since 1992)
16	10/09/2024	Service Delivery Director	Chris Bell	Negative / No Organisations	N/A
17	10/09/2024	Assistant Commissioner	Paul Betts	Negative / No Organisations	N/A
18	10/09/2024	Commander	Umer Khan	Negative / No Organisations	N/A

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