



## Professional Standards & Integrity (Police) Committee

**Date:** MONDAY, 25 NOVEMBER 2024  
**Time:** 11.00 am  
**Venue:** COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

**Members:**

Michael Mitchell (Chair)	Deputy Madush Gupta
Tijs Broeke (Deputy Chairman)	Joanna Tufuo Abeyie, Court of Common Council
Deputy James Thomson (Ex-Officio Member)	Florence Keelson-Anfu, Court of Common Council
Nicholas Bensted-Smith	Naresh Hari Sonpar
Jason Groves	Jacqui Webster, Court of Common Council

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

**Ian Thomas CBE**  
**Town Clerk and Chief Executive**

# AGENDA

## Part 1 – Public 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 25 September 2024.

**For Decision**  
(Pages 5 - 8)

4. **PUBLIC OUTSTANDING REFERENCES**

Joint report of the Town Clerk and the Commissioner.

**For Information**  
(Pages 9 - 10)

5. **QUARTERLY STOP AND SEARCH AND USE OF FORCE UPDATE (Q2)**

Report of the Commissioner.

**For Information**  
(Pages 11 - 16)

6. **SUMMARY OF ACTION FRAUD PUBLIC COMPLAINTS DATA- Q2 2024/25**

Report of the Commissioner.

**For Information**  
(Pages 17 - 22)

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

Report of the Commissioner.

**For Information**  
(Pages 23 - 44)

8. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q2**

Report of the Commissioner.

**For Information**

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**

**Part 2 – Non-Public Agenda**

12. **NON-PUBLIC MINUTES**

To approve the non-public minutes of the meeting held 25 September 2024.

**For Decision**  
(Pages 73 - 74)

13. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q2 - APPENDIX 4**

Non public appendices to be considered in conjunction with item 8.

**For Information**  
(Pages 75 - 80)

14. **VETTING - PROGRAMME OF CONTINUOUS IMPROVEMENT**

Report of the Commissioner.

**For Information**  
(Pages 81 - 88)

15. **POLICE CONDUCT REVIEWS - RANDOM SAMPLE**

Report of the Commissioner.

**For Information**  
(Pages 89 - 100)

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

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

## PROFESSIONAL STANDARDS & INTEGRITY (POLICE) COMMITTEE Wednesday, 25 September 2024

Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, Guildhall on Wednesday, 25 September 2024 at 1.45 pm

### Present

#### Members:

Michael Mitchell (Chair)  
Jason Groves  
Deputy James Thomson  
Jacqui Webster  
Joanna Abeyie  
Naresh Sonpar

#### Officers:

Richard Riley CBE - Town Clerk's Department  
Kezia Barrass - Town Clerk's Department  
Rachael Waldron - Town Clerk's Department  
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#### City of London Police

Paul Betts - City of London Police  
Sanjay Anderson - City of London Police  
Kate McLeod - City of London Police  
Carly Humphries - City of London Police  
Claire Cresswell - City of London Police  
Jesse Wynne - City of London Police

#### 1. APOLOGIES

Apologies were received from Florence Keelson-Anfu and Tijs Broeke.

#### 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 4 June 2024 were agreed as an accurate record.

#### 4. OUTSTANDING REFERENCES

Members received a joint report of the Town Clerk and the Commissioner which outlined the public outstanding references.

**RESOLVED**, - that the report be noted.

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

Members received a report of the Commissioner which provided a quarterly update on the use of stop and search and use of force.

Members noted the small numbers reported for strip searches in the City and suggested that brief details could be included in future reporting to provide more context for this data.

Officers outlined that the importance of ensuring that the powers of stop and search and the use of force would be exercised in targeted and purposeful ways, to limit the impacts on the public.

Officers also noted that initial findings from the University of East London project looking at City of London Police stop & search data would be received shortly, the Chair requested that the Committee be sighted on the outcome of this work, once available.

**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 within the City of London Police.

Members expressed an interest in receiving direct feedback from staff networks. Officers agreed to recommit to staff network events and consider appropriate methods of feedback from forums to the Committee.

Members welcomed the report and noted that this area of work was critical to build trust and confidence in the City of London Police.

The Chair stressed the importance of the Committee seeing an implementation plan for the new Equity, Diversity and Inclusion Strategy. Officers undertook to ensure that the Committee was also provided with the outcome of the Cultural Audit work in the City Police.

**RESOLVED**, - that the report be noted.

7. **Q1 ACTION FRAUD COMPLAINTS**

Members received a report of the Commissioner which outlined Action Fraud Complaints in Q1 2024 – 2025.

**RESOLVED**, - that the report be noted.

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

Members received a report of the Commissioner which provided an update of professional standards, conduct and vetting from Q1 in 2024 – 2025.

Members requested that more detailed data be covered to include the ethnicity of the complaints reported, officers agreed to consider how to include this information.

**RESOLVED**, - that the report be noted.

16. **INCLUSIVE EMPLOYERS UPDATE**

The Chair agreed to move this item into the public session.

Members received a report of the Commissioner which provided an overview of the Inclusive Employers Standard (IES) accreditation process. The Chair, and members, congratulated the City Police on achieving a silver IES rating.

**RESOLVED**, - that the report be noted.

9. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**  
There were no questions.
10. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**  
There was no other business.
11. **EXCLUSION OF THE PUBLIC**  
**RESOLVED**, – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items 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.
12. **NON-PUBLIC MINUTES**  
**RESOLVED**, - that the non-public minutes of the meeting held on 4 June 2024 were approved as an accurate record.
13. **PROFESSIONAL STANDARDS, VETTING AND MISCONDUCT NON-PUBLIC APPENDICES**  
Members received a report of the Commissioner which provided the non-public appendices to be read in conjunction with item 8.
14. **POLICE COMMITTEE REPORT DIP SAMPLES OF MISCONDUCT**  
Members received a report of the Commissioner which provided dip samples of misconduct cases.
15. **VETTING REVIEW**  
Members received a report of the Commissioner which provided a review of vetting arrangements.
17. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**  
There was one question which related to the Independent Custody Visitor volunteers.
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 15:35**

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Chairman

**Contact Officer: Kezia.Barrass**

**Kezia.Barrass@cityoflondon.gov.uk**



PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

**PUBLIC OUTSTANDING REFERENCES**

8/2023/P	<b>7<sup>th</sup> November Item 7 Quarterly Equality and Inclusion Update</b>	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	<b>In Progress</b> - 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 at November’s meeting.
	<b>September 2024 – Item 6 EDI Update</b>	Chair requested to meet staff networks in most appropriate capacity and hear feedback.	Commissioner	<b>In Progress</b> – Work is underway to progress this action. A meeting was scheduled in October but was not able to take place.
	<b>September 2024 – item 8 Professional Standards, conduct and vetting update q1</b>	Members requested demographic of complaints data be included in reporting.	Commissioner.	<b>Completed</b> – this is contained within the Professional Standards, Conduct and Vetting Update report on the agenda at November’s meeting.
	<b>September 2024 – Item 15 Vetting review</b>	Chair requested report be returned to PSIC including phased high level plan for future vetting arrangements and expected output	Commissioner	<b>Completed</b> – on the agenda at November’s meeting

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# Agenda Item 5

<b>Committee(s):</b> Professional Standards and Integrity Committee (PSIC)	<b>Dated:</b> 25 November 2024
<b>Subject:</b> Quarterly Stop and Search and Use of Force update (Q2)	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N/A</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>N/A</b>
<b>Report of:</b> Commissioner of Police	<b>For Information</b>
<b>Report author:</b> T/Supt J Wynne, Taskforce and S&S Lead	

## Q2 – 2024

### Summary

City of London Police (CoLP) continue to support Op Benbow<sup>1</sup> 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 the nature of the protests 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 decrease of 6.25% since the previous quarter (Q1 2024).

Of the 675 stop/searches in the Q2 period, 88 were dip sampled at a rate of 13.03% experiential learning and feedback is given to officers where appropriate. This is within the target range of 10-15% dip sampling. This is an increase of 7% from Q1. There are 3 live ongoing formal complaints under investigation (1 for Stop and Search and 2 for Use of Force) and any learning from these will be shared as necessary.

Even though there has been a decrease in stop search and a decrease of items found the positive outcomes rate has remained at 46%. During the period of Q2 we have again seen an increase in Black disproportionality from 2.4 to 2.9. The immediate or obvious reason for this is during this period COLP assisted the Metropolitan Police for the Notting Hill carnival which sees an increase in Section 60 CJPO searches. Asian disproportionality remains the same at 1.0. (National rates 2023 - Black ethnicity –








<sup>1</sup> Op Benbow- Cross Border mutual aid Operations with MPS








4.85, meaning a person of Black ethnicity is nearly five times more likely to be stopped and searched than a white person, Asian ethnicity – 1.58 times more likely to stop searched).

The University of East London project has been authorised and will provide academic and meaningful analysis of CoLP actions, Initial reports will be expected late 2024.









## 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	675	- 45 6.25%		Decrease in stop/search
Arrest from stop search	219	- 15 6.84%		Decrease in arrests from stop search
Searches under s.60	19	+ 19		Increase in Section 60 CJPO but these are all with the MPD.
Juveniles searched	51	- 9 15%		Decrease in youth search.
Black disproportionality	2.9	+0.5 20.83%		Increase but this will be from support to the MPS for Notting Hill Carnival
Asian disproportionality	1.0	0		

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend 	Comment (if appropriate)
Total items found	296	- 44 12.94%		An decrease in the number of items found as a result of stop search, but there has also been a decrease in stop search and arrest from stop search. The positive outcome from stop search has remained the same at 46%.
Strip searches <sup>2</sup> total	9	- 6 40%		
Strip search-More thorough	0	-2		
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	848	- 129 13.20%		

<sup>2</sup> 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)
Juvenile use of force	43	+3 7.5%		
Uses of force arrests	526	- 96 15.56%		
Uses of taser	6	- 8 57.14		
Taser discharges	1	0		
Live complaints relating to stop/ search	1	-1 50%		
Live complaints relating to use of force	2	-1 33.33%		

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

- No significant issues identified this quarter

## **Ongoing Work**

Officers are currently under taking training and inputs on the overall aims and ambition of the City of London in relation to the Police Race Action Plan particularly within the areas of Stop and Search and Use of Force.

A relaunch of process maps, access to performance data and promoting a culture of learning and continuous improvement will be a feature. There has been a new Strategic Steering Group as well as a Tactical Working Group launched in anticipation of a wider relaunch and emphasis on the importance of Stop and Search, Use of Force in gaining the Trust and Confidence of the public and we continue to participate in the National Working Group.

## **Next steps**

Working with the IASG Chair to launch a BWV Scrutiny Group that will allow access to BWV and robust and independent scrutiny of the use of Stop and Search as well as Use of Force. We are also developing contacts with the MPS IAGs to include CoLP stop searches in their reviews by their more diverse groups for feedback and scrutiny. The next IASG is taking place on 20<sup>th</sup> November 2024 at 18:00.

## **Appendix A**

### **Information on Strip Search policy and SOP**

Juvenile strip searches - 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). Every juvenile strip search is reviewed by a supervisor and second line manager.



## City of London Corporation Committee Report

<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Dated:</b> 25/11/2024
<b>Subject:</b> Summary of Action Fraud public complaints data– Q2 2024/25	<b>Non-Public report:</b> For Information
<b>This proposal:</b> <ul style="list-style-type: none"> <li>• provides statutory duties</li> </ul>	Public trust and confidence
<b>Does this proposal require extra revenue and/or capital spending?</b>	No
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	N/A
<b>Report of:</b>	Assistant Commissioner Betts
<b>Report author:</b>	Detective Superintendent Carly Humphreys

### Summary

This is quarterly report produced by the Professional Standards Department to provide members with an overview regarding Action Fraud complaints.

During Quarter 2, Action Fraud recorded 137,259 reports on the National Fraud Database (91,331 crime reports and 45,928 Information reports). The complaint figures (total) represent 0.08% of the total number of Action Fraud reports recorded in Q2.

A total of 105 cases were logged in Q2 2024/25 which is an overall increase of 12 cases from Q1 2024/25 (13%). Within these cases there were 108 allegations recorded in Q2 2024/25. This is an increase of 14 allegations from Q1 2024/25 (15%).

The majority of these allegations (81/108) relate to 'Police action following contact', these generally refer to the investigative expectations held by those reporting a fraud.

## **Recommendation(s)**

Members are asked to:

Note the report.

### **Appendices**

- Appendix 1 – Summary of Action Fraud public complaints data– Q2 2024/25

### **Carly Humphreys**

Detective Superintendent Carly Humphreys  
Head of Professional Standards

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**Summary of Action Fraud public complaints data– Q1 2024/25**

<b>Metric</b>	<b>Current quarter (Q1)</b>	<b>Previous quarter (Q4)</b>	<b>(%) change (Q on Q)</b>	<b>Comment</b>
Complaints – Schedule 3	<b>0</b>	<b>1</b>	<b>0%</b>	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 <sup>1</sup> .
Complaints – not Schedule 3	<b>92</b>	<b>104</b>	<b>12%</b>	
Allegations	<b>94</b>	<b>240</b>	<b>61%</b>	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. <b>*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.</b>
Average time to log complaints (days)	<b>N/A</b>	<b>5</b>		<i>Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.</i>
Average time to contact complainant (days)	<b>N/A</b>	<b>35</b>		
Complaints finalised – Schedule 3	<b>5</b>	<b>33</b>	<b>85%</b>	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	<b>61</b>	<b>80</b>	<b>24%</b>	
Average time to finalise complaint cases (days) – Schedule 3	<b>Case combined data average 154 days</b>	<b>97</b>	<b>n/a</b>	<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		<b>75</b>	<b>n/a</b>	
Applications for review sent to local policing body	<b>1</b>	<b>0</b>		One recorded during Q1
Applications for review sent to IOPC	<b>0</b>	<b>0</b>		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).

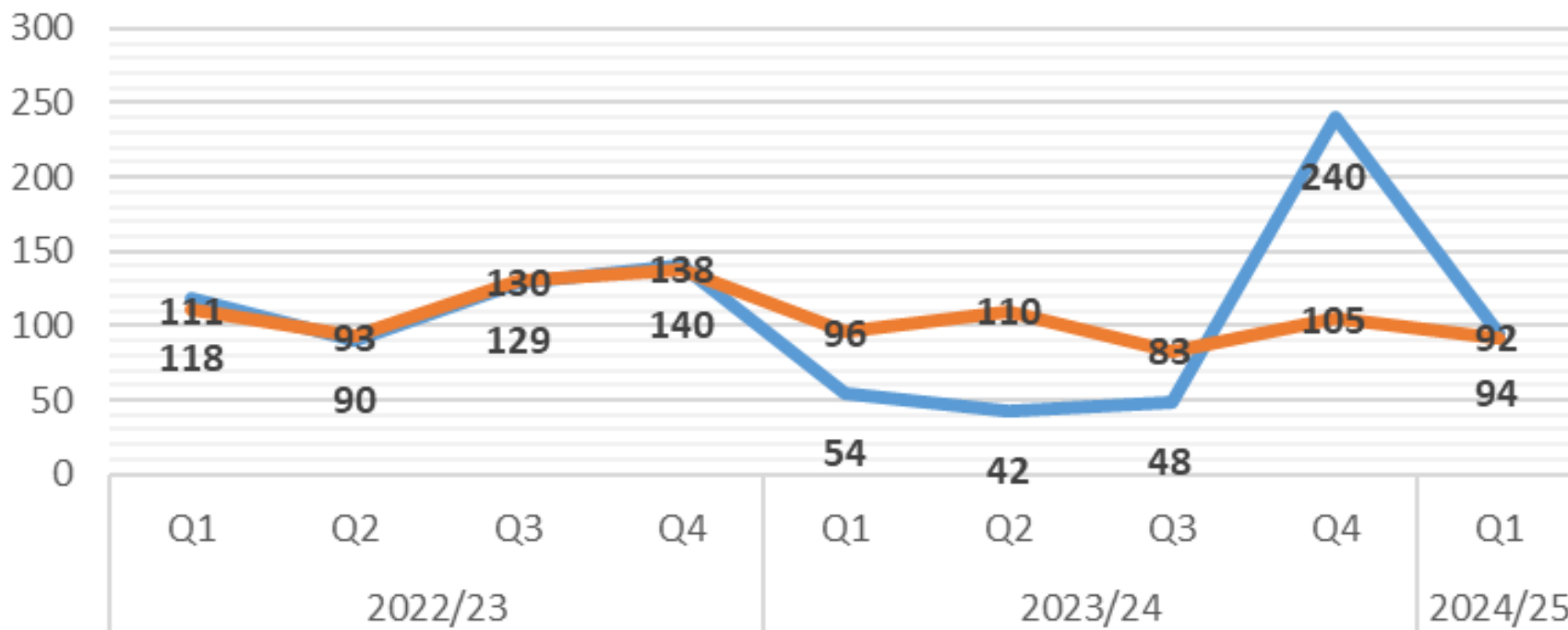
The complaint figures (total) represent 0.06% of the total number of Action Fraud reports recorded in Q1.

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<sup>1</sup> 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 7

<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Dated:</b>
<b>Subject:</b> Equity, Diversity, Inclusivity (EDI) Update	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N/A</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>N/A</b>
<b>Report of:</b> Commissioner of Police	<b>For Information</b>
<b>Report author:</b> Det Supt Kate MacLeod	

## Summary

With our EDI strategy launched, new EDI Governance is in place internally and much activity is underway to drive these ambitions forward.

Inclusivity, Culture and Organisational Development (ICOD) are now prioritising our Implementation Plan and Evaluation framework. We also continue to deliver against our own internal actions plans as well as Nationally driven reporting and HMICFRS Inquiry.

A range of modules have been delivered over our Summer period, cementing our active bystander and ethical dilemmas products and building in events to coincide with White Ribbon Month in November 2024. We are working hard to create new material to land from January 2025 onwards, including modules on extremist ideology and a project with Exeter University on Intercultural Communication.

The ICOD team continue to support CoLP Staff Networks and Associations in attending National conferences. Last month, representatives from our Chief Officer Team, ICOD and Black Police Association attended the 3 day National Black Police Association conference and are meeting this month to take actions forward. Under our new governance structure we are ensuring that their voices are heard and that actions are being taken against the challenges and risks highlighted.

Although demands upon ICOD remain considerable, due to both internal challenges and external scrutiny, we are now seeing progress with recruitment activity and new postings into the team.

## 1. Internal Updates

### ***EDI Strategy, Governance & Accountability***

Since our last report, we have held our inaugural EDI Delivery Board and an additional EDI Strategic Board, both of which have employed our new governance structure and 'accountability-focused' agenda.

Our EDI dashboards remain quite primitive, however these are being developed with support from the Strategic Development Unit. With our Strategy now fully launched and much action already, we continue to work on our final 'implementation' plan and will share this in due course.

### ***Inclusivity Programme***

Over the last period, the ICOD team have delivered as follows –

#### **'Ethical dilemmas':**

- 90 Ethical Dilemmas places on Inclusivity Programme modules were available between July and Sept of this year.
- Between 1<sup>st</sup> of July and 30<sup>th</sup> of September, a total of 41 places have been taken. Approximately 1,620 employees are eligible to participate which could be an elective module as part of their inclusivity programme,
- All sessions have received 100% feedback.
- We are improving our feedback by making this a mandatory part of attendance.
- Next steps form part of our wider governance i.e. ensuring that we measure the impact that these sessions are having across the '4P's of our strategy.

#### **'Understanding Ideologies linked to Extremism':**

- 30 Understanding Ideologies linking to Extremism places on Inclusivity Programme modules were available between July and Sept of this year.
- We continue to analyse the register for how many places were taken between 1<sup>st</sup> of July and 30<sup>th</sup> of September. Approximately 1,620 employees are eligible to undertake a module, and the requirement remains that everyone should complete a module every 6 months, or 2 a year, as minimum as part of their inclusivity programme journey.



- All sessions have received 100% feedback.
- We are improving our feedback by making this a mandatory part of attendance.
- Next steps form part of our wider governance i.e. ensuring that we measure the impact that these sessions are having across the '4P's of our strategy.

**'Active Bystander':**

- 30 Active Bystander places on Inclusivity Programme modules were available between July and Sept of this year.
- Between 1<sup>st</sup> of July and 30<sup>th</sup> of September, a total of 20 places have been taken. Approximately 1,620 employees are eligible to undertake a module, and the requirement remains that everyone should complete a module every 6 months, or 2 a year, as minimum.
- All sessions have received 100% feedback.
- We are improving our feedback by making this a mandatory part of attendance
- Next steps form part of our wider governance i.e. ensuring that we measure the impact that these sessions are having across the '4P's of our strategy.

Please see appendix A for a breakdown of the feedback we have received as a result of our most recent Inclusivity Programme modules.

***Code of Ethics Roadshow***

The College of Policing (CoP) have invited CoLP to host a 'Code of Ethics Roadshow'. This is scheduled to take place on Monday 25<sup>th</sup> November.

As part of their visit to the City, Senior representatives from the College will observe some of our formal internal meetings as well as meeting informally with colleagues from across all ranks and roles. The aims of this roadshow include: -

- To illustrate to partners our open and transparent approach to all we are doing to improve EDI,
- Highlight key issues and challenges in the City, providing greater context to our EDI workstreams
- Provide a platform whereby CoP leads can understand our approach to the new Code, and an understanding of how it is being used / interpreted within CoLP.
- Showcase the CoP to our officers / staff and the support that they can provide

Our Communications team have worked with ICOD on this event and will be producing both internal and outward facing messaging.

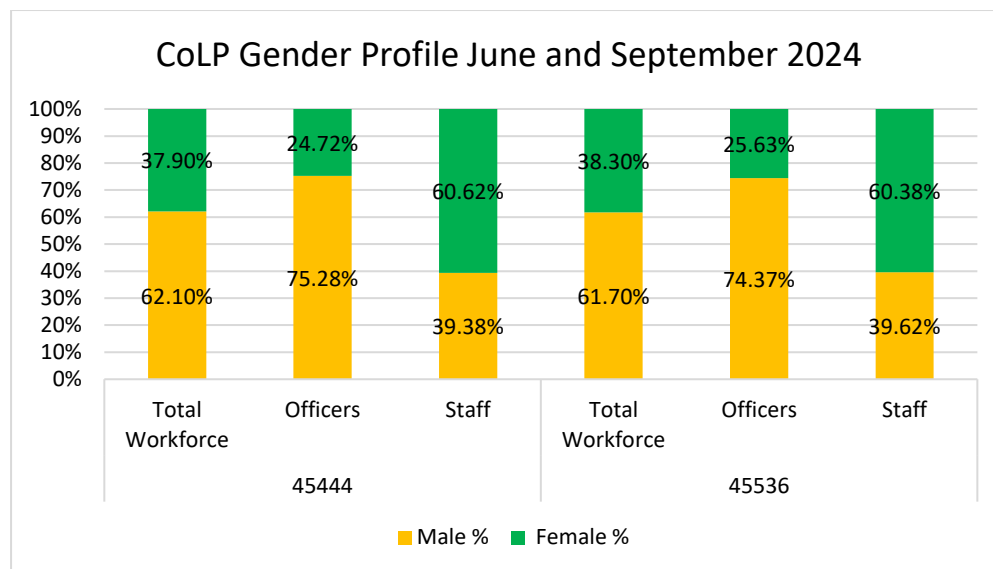
**2. People data internal review**

### Officer gender

Officer female profile has increased by 0.9% with 25.6% female of 999 total officer headcount, compared to 24.7% of 999 headcount in June 2024. Of the 24 officers who joined the force as at September 2024, 45% of them were female.

### Staff gender

Staff gender has remained similar to the last reporting period, with the female profile at the end of September at 60.4% of 573 total Staff headcount (decreased from 579 headcount).



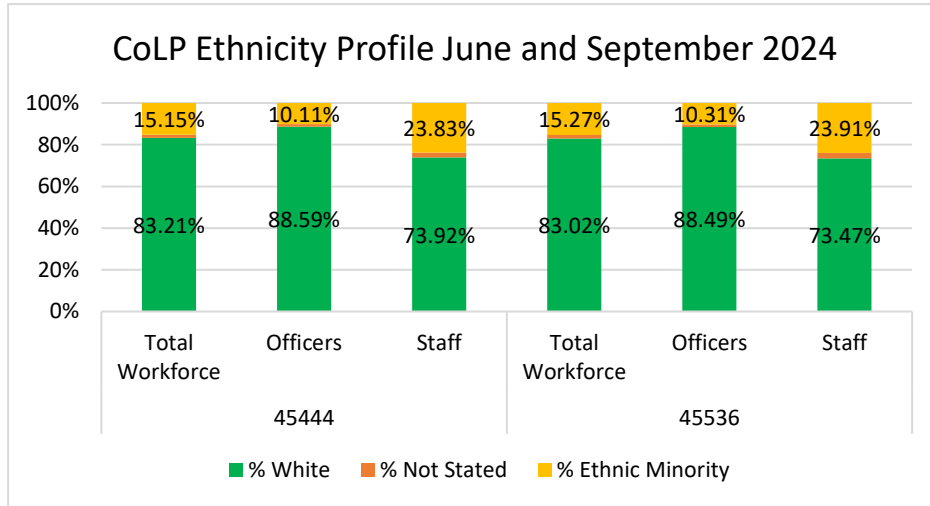
### Officer ethnicity

There has been a slight increase from the last reporting period (June 2024) with 10.31% of officers identifying as being from an ethnic minority background in September 2024 compared to 10.11% of officers identifying as from an ethnic minority background (headcount 999). Of the 24 officers that joined the force this quarter, 8% identified as being from an ethnic minority background.

### Staff ethnicity

The number of ethnic minority staff has increased by 0.1% since the last reporting period to 23.9%. Staff total headcount is 573 (previously, 23.8% of 579 headcount).

Our



total

workforce, Officers and Staff, has a headcount of 1572. 38.3% are female (increase from 37.9% in June 2024) and 15.3% identify as from an ethnic minority background (increase from 15.1% in June 2024).

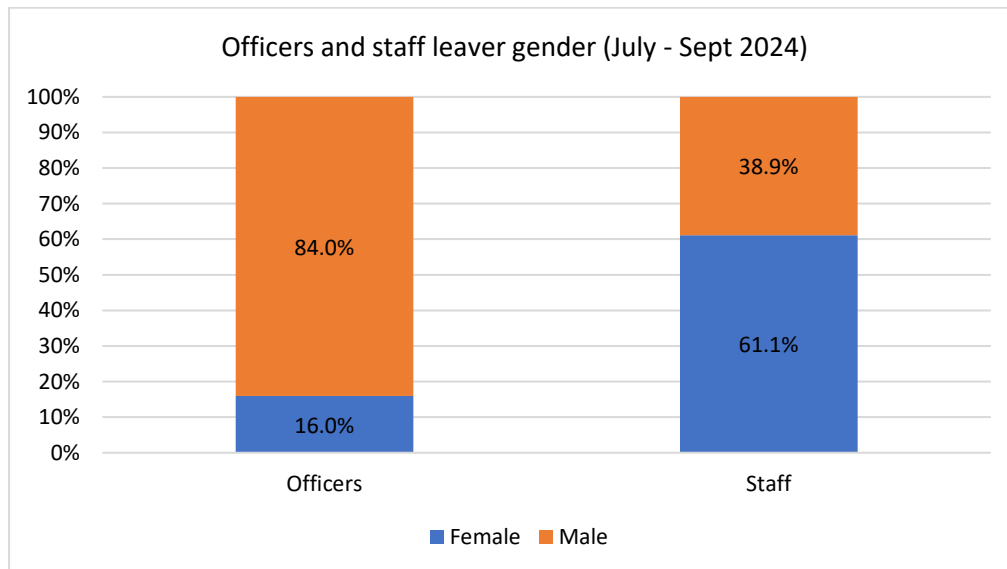
### Leavers

#### Officers

Of the 25 officers that left the workforce, 16% were female. 4% of the 25 officers who left identified as being from an ethnic minority background.

#### Staff

18 staff left the workforce with 61.1% of them being female. 16.7% of the 18 who left stated they were of an ethnic minority background.



## Leavers: Officers

During the period (July-September 2024), 25 Police Officers left the force, this equates to a 2.5% leaver rate. Across April-September 2024, 44 officers left the force, a 4.4% leaver rate. Compared to Q1-2 of 2023/24, where 55 Officers left the force (5.5% leaver rate), the number of leavers has reduced in 2024/25 and is likely to be a lower leaver rate overall than 2023/24. Reasons for leaving are provided in the table below, the main reason for leaving in Q1-2 2024/25 was retirement.

Of the 44 Police Officers that left the force, the majority left from Local Policing (14) and National Lead Force (13 - half of which are related to change in regional ROCU personnel). 2 officer left during their probation; the majority left from within the constable rank. Excluding ROCUs, the average length of service for officer leavers was 17 years.

Police Officers– Reasons for Leaving (per Financial Year)

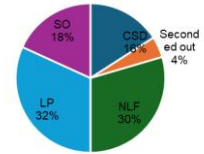
	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25 Q1-2
Other	0	0	0	1	0	1	1	0
Dismissed	1	1	0	0	0	1	1	1
End of Contract/Secondment	1	0	0	4	1	11	8	6
Medical Retirement	2	0	2	1	0	2	1	2
Retirement	35	37	31	29	42	43	31	16
Transfer	9	17	22	14	26	20	24	6
Resignation	26	7	22	21	27	34	41	13
<b>Total</b>	<b>74</b>	<b>62</b>	<b>77</b>	<b>70</b>	<b>96</b>	<b>112</b>	<b>107</b>	<b>44</b>

The Retention and Exiting Working Group continues to review the exiting data to better understand why people are leaving to develop retention strategies. In April 2024, the exit survey was updated to use questions from a national leaver's framework. From the exit surveys for both Officers and Staff (April 2024–September 2024), personal and professional development and training was the main contributing factor for people leaving. There were positive scores for enthusiasm for the job, satisfaction with pay and benefits, and being treated fairly. Areas to work on included wellbeing, work-life balance, workload, and training and development.



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Officer Leavers by Directorate Q1-2 2024/25



Officer Reasons for Leaving Q1-2 2024/25



### 3. Key issues, risks, and mitigations

#### Staff Networks and Associations (SNAs)

Under our new EDI governance structure and supporting strategy, we are taking forward recommendations made as part of a review of our networks and associations. In parallel, we have asked our 13 SNAs to complete a quarterly update detailing their 3 key achievements since the previous reporting period, their 3 key challenges/risks and the 3 key areas where they need support or decision.

To provide a 'taster' of these issues, a combined pack of responses can be found at Appendix B. A key theme is that some SNA members do not feel supported by supervisors to conduct SNA activities. We continue to review dedicated time allowance and will be submitting recommendations to the Chief Officer Team.

#### Resourcing and Demand

Since the last reporting period, ICOD has confirmed that a new Chief Inspector will be joining the team mid-November, it is anticipated that this additional resource will be able to bolster progress in some areas, including EDI Strategy Implementation and Youth IASG (Independent Advisory Scrutiny Group). ICOD remains a small team with a significant portfolio, it is impacted considerably by any sickness or abstraction. We are adhering to our recruitment plan for our new Grade E Organisational Development (OD) Practitioner, who will be able to take the lead on our future Staff Survey, Leadership Training and Evaluation.

A new PC Staff Officer has also recently been recruited for our Head of Professionalism and Trust, we aim to recruit into our 4<sup>th</sup> PC vacancy at the end of this year; it is worth noting that our current 2 PCs are currently largely involved in

training delivery. The remainder of ICOD (Supt and 1 x Grade E) are focused on delivery of the Inclusivity Programme, internal EDI governance and business planning,

#### **4. Forward look**

##### ***Staff Survey and Cultural Audit***

The Autumn 2024 pulse survey launched on 15<sup>th</sup> September 2024 and closed on 2<sup>nd</sup> October 2024. The survey was open to the total workforce to complete, with the exception of contractors. The pulse survey measured engagement and culture. Each department within Force is provided with a bespoke report relevant to their area(s) of responsibility.

The results showed a completion rate of 51%, a fall of 6% since the last full staff survey in January 2024. The June 2023 “Pulse” Survey had a completion rate of 56%. The engagement score (consisting of question sets designed to analyse the level of enthusiasm and dedication that the workforce feels towards the organisation), has remained at 71%.

For the first time, a question set relating to culture and behaviour has been added, creating the new culture key performance indicator. This will continue through to the last cycle of surveys for the three years. The culture and behaviour questions have been added in order to prioritise teams that will benefit from participating in the cultural audit. The next full staff survey will take place in March 2025.

The cultural audit pilot is underway, with two further teams participating over the coming six weeks. Findings will be reported to the Police Authority Board in the new year.

A full report regarding the Pulse Survey will be presented to members of PAB and SPCC, this provides a high level summary of outcomes.

##### ***White Ribbon Week***

This takes place at the week commencing 25<sup>th</sup> November 2024, and we have a number of activities planned to coincide, including a ‘focus on’ victim-blaming language (which will be delivered by 2 colleagues from the IOPC) on Tuesday 26<sup>th</sup> November; and also a face to face session to be delivered by a Chief Supt on an investigation into a violent sexual assault, this will be heard on Friday 29<sup>th</sup> November.

Alongside this, we continue to work on our own action plan, with strands around creating safer spaces and relentless pursuit, alongside improving internal trust and confidence.

### ***Inclusivity Standard***

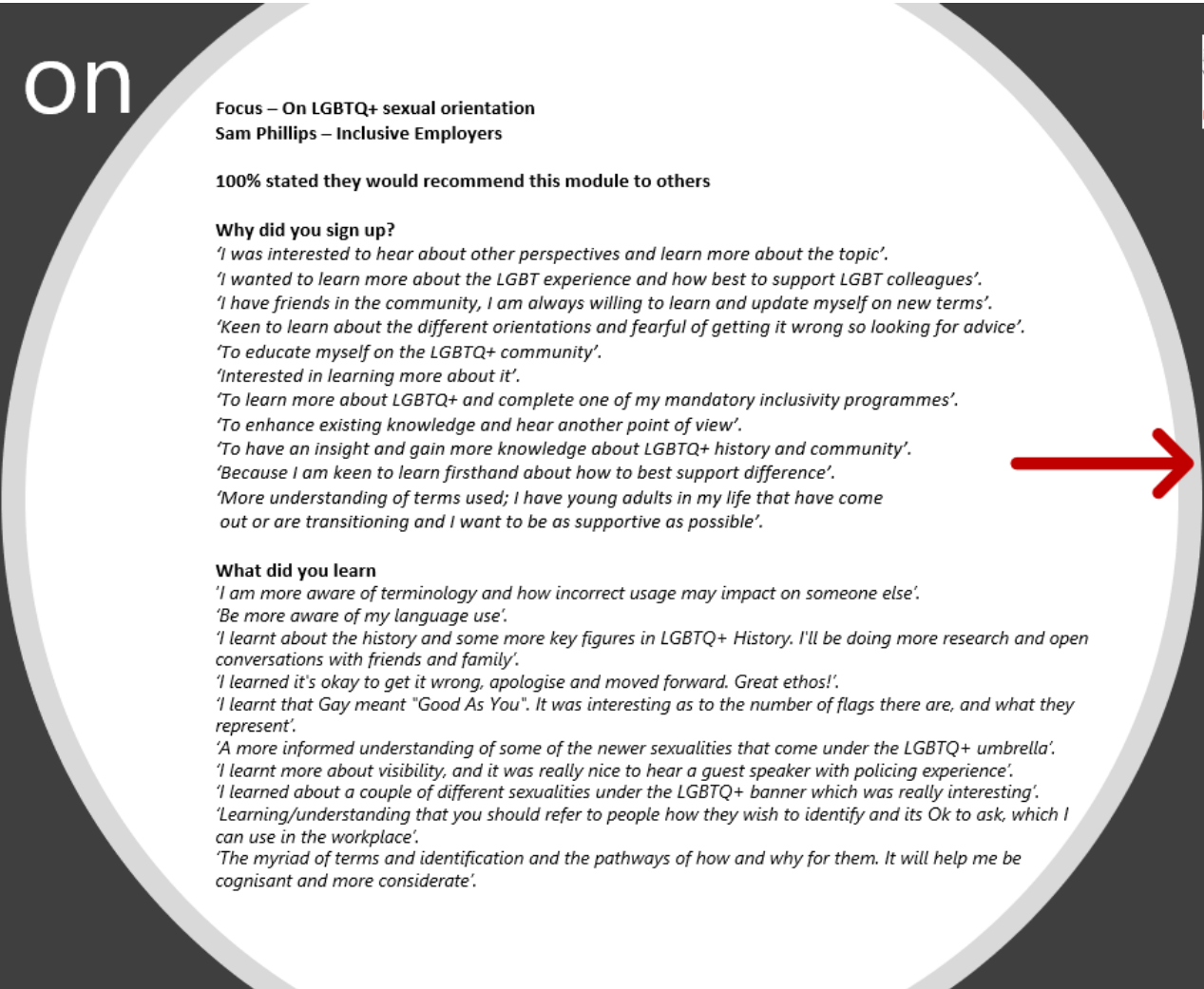
Since the last reporting period, we have met with representatives from Inclusive Employers to received our feedback on our 'Silver' award.

This included highlighting our areas of strength along with our areas for improvement. We have invited the team to attend a future session with Senior Leaders to explain more of the detail and what is required collectively from us a force to work towards the higher award. However, we are informed it is unlikely we will achieve a 'Gold' standard for an additional 2 years at the very minimum due to the work required to attain the highest award.

Slides at Appendix C provide a breakdown which may be of interest to members. Next steps in relation to this piece include incorporating actions into our EDI governance framework, avoiding duplication, to ensure that progress is effectively monitored.

Appendix A- Inclusivity Programme Sessions (Evaluation slides follow)

Date	Title	Content
3rd July	Focus on Transgender	An opportunity to hear a personal story from a well-known Trans actress who will talk about the challenges she has faced from her childhood through to her professional life.
25 <sup>th</sup> July	Focus on Gender Identity	What is gender? What does gender identity mean? How do we talk about gender openly and inclusively? This webinar aims to discuss the basics of gender, gender identity and gender expression to clear up some misconceptions and give you the confidence as Officers and Staff to approach conversations with knowledge and understanding.
26 <sup>th</sup> September	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.
22nd October	Focus on... Managing Colleagues with Health Conditions, Neurodiversity and Disability	Many line managers don't have experience managing people with a health condition, neurodiversity or disability and it is important to know what is fair or reasonable when agreeing things like adjustments. This Focus on... session has been put together to help managers understand, and simplify issues around, managing colleagues who have different needs.
Various	<b>Ongoing inputs throughout the Summer-Mentivity (impact of police use of force on black communities), Active Bystander, Ethical Dilemmas.</b>	



# Focus on

**Focus – On LGBTQ+ sexual orientation**  
**Sam Phillips – Inclusive Employers**


**100% stated they would recommend this module to others**

**Why did you sign up?**

- 'I was interested to hear about other perspectives and learn more about the topic'.*
- 'I wanted to learn more about the LGBT experience and how best to support LGBT colleagues'.*
- 'I have friends in the community, I am always willing to learn and update myself on new terms'.*
- 'Keen to learn about the different orientations and fearful of getting it wrong so looking for advice'.*
- 'To educate myself on the LGBTQ+ community'.*
- 'Interested in learning more about it'.*
- 'To learn more about LGBTQ+ and complete one of my mandatory inclusivity programmes'.*
- 'To enhance existing knowledge and hear another point of view'.*
- 'To have an insight and gain more knowledge about LGBTQ+ history and community'.*
- 'Because I am keen to learn firsthand about how to best support difference'.*
- 'More understanding of terms used; I have young adults in my life that have come out or are transitioning and I want to be as supportive as possible'.*

**What did you learn**

- 'I am more aware of terminology and how incorrect usage may impact on someone else'.*
- 'Be more aware of my language use'.*
- 'I learnt about the history and some more key figures in LGBTQ+ History. I'll be doing more research and open conversations with friends and family'.*
- 'I learned it's okay to get it wrong, apologise and moved forward. Great ethos!'*
- 'I learnt that Gay meant "Good As You". It was interesting as to the number of flags there are, and what they represent'.*
- 'A more informed understanding of some of the newer sexualities that come under the LGBTQ+ umbrella'.*
- 'I learnt more about visibility, and it was really nice to hear a guest speaker with policing experience'.*
- 'I learned about a couple of different sexualities under the LGBTQ+ banner which was really interesting'.*
- 'Learning/understanding that you should refer to people how they wish to identify and its Ok to ask, which I can use in the workplace'.*
- 'The myriad of terms and identification and the pathways of how and why for them. It will help me be cognisant and more considerate'.*




**We continue to have a calendar of Focus On throughout the year**



# Focus on

**Focus On – Rebecca Roots' Journey as a Trans person**  
100% stated they would recommend this module to others




**Why did you sign up?**

- 'I was interested to learn more about Rebecca's journey'*
- 'To learn more about Trans peoples journey and improve my awareness'*
- 'Interested to understand what it must be like to go through this journey'*
- 'Because I wanted to learn more about how I can support the Trans community'*
- 'To understand the perspective and experience of someone from the trans community'*
- 'I do not have direct contact (that I am aware of) with any trans people, so I was very interested to listen and learn from Rebecca's story'*
- 'Transgender issues are something I do not know much about and I wanted to learn more'*
- 'Gain knowledge and understanding'*
- 'My understanding of the trans community is limited. I wanted to learn and understand.'*
- 'To find out more about trans people'*
- 'Requirement to attend events for PDR'*
- 'To learn more about 'Trans Person' and hopefully try and understand the different stages of their life, what is happening and what they go through.'*
- 'I work closely with a TransWoman and wanted a better understanding'*
- 'To widen my knowledge in this area and understand it from someone's lived experience'*


**What did you learn**

- 'A deeper understanding of the transgender community and perhaps being less afraid to ask questions.'*
- 'I will continue to listen and engage with people no matter their personal characteristics. We are all different and have had unique experiences which everyone can learn from.'*
- 'I learnt - Accept, Listen, Learn and Yes – ALLY'*
- 'To broaden my consideration to the difficulties faced by people who have a different life experience to my own'*
- 'To be more aware and be more supportive; I had a friend (sadly passed) who lived a double life and I am grateful that they could be open, honest and be their true self with me.'*
- 'I learned about the struggles of a trans woman, some issues I had not considered before'*
- 'How transgender people feel and what they have to face or had to face in the past'*

**We continue to have a calendar of Focus On throughout the year**



# Focus on




**Focus on... VAWG in the City**

**100% stated they would recommend this module to others:**

**What did you learn and how will you use the learning?**


- 'Up to date info on Violence towards women and pleased something is being done in a positive and coordinated way'*
- 'Where to go and what to do in cases where you see/hear or aware of appropriate incident'*
- 'Understand that there is as much in what isn't said as what is said'*
- 'The overarching plans to tackle VAWG is important as a force'*
- 'To be more vigilant and aware of your surroundings'*
- 'Current actions and approach towards VAWG across the city and how to work within that framework'*
- 'It was interesting to find out more on the current work ongoing in this area and what we might be asked in terms of VAWG data and analysis'*
- 'The sobering extent of the issue'*
- 'I saw from all speakers; that VAWG isn't going away, a much greater effort needs to be made collectively across all the nations'*
- 'All the different types of Sexual Assault/Abuse, I feel I have a much better understanding of the topic.'*
- 'Legislative changes'*
- 'I can embed the learning of what the city and its partners do into my training sessions'*
- 'A reminder of what White Ribbon's purpose is was useful for me to share in discussions in future'*
- 'New legislation and Safer Spaces app was useful to hear about and hopefully we can take that into the community for their awareness'*
- 'That policing (and hopefully society as a whole) is finally taking VAWG seriously. To raise awareness amongst colleagues/friends of the good work being done'*
- 'I learnt a lot about the focus of VAWG and how this is working together with the City to make a safe space and I will impart this on to others'*
- 'I hadn't been previously aware of the new legislation being brought in, I am interested to see it being applied by CoLP'*
- 'Didn't know about the safe spaces and I work for CoLP - This means there will be a lot of other women out there that have no knowledge'*
- 'The amount of work going on behind the scenes to keep women safe - advice to officers'*
- 'The safe spaces was something new and very helpful'*

**We continue to have a calendar of Focus On throughout the year**



The slide features a large white circle on a dark grey background. The text is arranged within and around this circle. In the top left, the title 'Active Bystander' is written in large white font. In the top right, the City of London Police logo is displayed. The central text, including the title 'Active Bystander Training', the 100% recommendation statistic, and the feedback questions and answers, is contained within the white circle. A red arrow points from the right side of the circle towards the text on the right side of the slide.

# Active Bystander



## Active Bystander Training

100% stated they would recommend this module to others

**Why did you sign up**


- *'Interest into the subject'.*
- *'Wanted to know how COLP intends to utilise this to influence change in culture'.*
- *'For awareness, to highlight any issues in my work environment'.*
- *'Really essential input and should be mandatory for all in my opinion, especially to those officers who think it doesn't apply to them'.*

**What did you learn?**

- *'Reminder on how to act and behave'.*
- *'The importance of doing the right thing and calling out bad behaviour'.*
- *'How to listen out and potentially to challenge behaviour'.*
- *'To advise others to raise issues and to stand up for others'.*
- *'Case studies and options'.*
- *'Think about what others say and act'.*

Sessions continue to be booked for 2024/25. We will continue to deliver it as part of the Student Officer programme.

# Ethical Dilemmas



**Ethical Dilemmas**  
As part of the continued delivery of Ethical Dilemmas linked to the Code of Ethics, we delivered sessions to the force wide during July – September 24.


**100% stated they would recommend this module to others**

**Why did you sign up?**

- *'Interested in the subject'.*
- *'Hear other's thoughts on how to approach ethical dilemmas'.*
- *'I have heard good things about it'.*
- *'Something a bit different, interactive and was interested to see how it could be delivered and how attendees would interact'.*
- *'Interested to see how it can help in my role'.*
- *'Had feedback from colleagues that it is a good programme'.*
- *'Opportunity to understand latest thinking on decision making'.*
- *'To support my growth as a manager, able to give more support to my team'.*

**What did you learn?**

- *'Never make assumptions and always question what you see and hear'.*
- *'Will learn to listen and apply accordingly to avoid language barrier'.*
- *'To take a step back from my own assumptions / perspective and take a more considerate approach'.*
- *'Will reassess how to deal with people during meetings'.*
- *'To pursue and reflect, consider others' views before making a decision'.*
- *'Learned about ladder of inference, I will collect more information before making my decision'.*
- *'The 5 steps of listening – will use more one to one, either chair or receive'.*
- *'Talk to people. Don't be afraid to talk solutions through and explore solutions'.*
- *'Tools to aid decision making, listening tool'.*



Future sessions for Middle Managers are arranged for 2024/25 from July 24

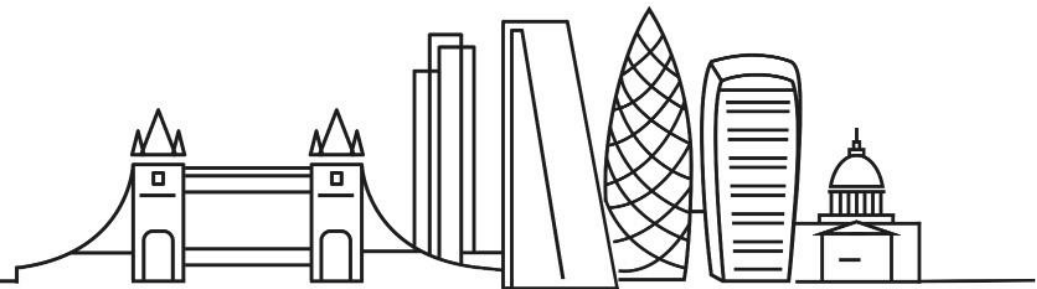
We will also be incorporating into future Leadership programmes



Appendix 1  
To be presented at PSIC, 25<sup>th</sup> November  
(Previously presented to EDI Strategic Board, 12<sup>th</sup> November)

Page 37

(Nil return alphabetically - Armed Forces, AMP, GEN, LGBTQ+,  
Menopause Action, Parenting Support, Polish Network, Staff Network).



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# 1) Key Achievements since last meeting

## NETWORK OF WOMEN

1. Creation of new tactical plan
2. New Chair and events execs  
Brogan Hawkins replaces Lauren Coward as cochair
3. Input on Army's approach to leadership

## WELL-BEING NETWORK

1. Walking City tours
2. More PTIs trained
3. Garden club supported and active

## CHRISTIAN POLICE ASSOCIATION

1. Attendance at annual general meeting
2. Team feels supported in spirit and love, where they can pray for one another / colleagues
3. Grateful for funding which encourages team bonding / learning

## GYPSY ROMA TRAVELLER NETWORK

1. Liaison with National equivalent (GRTPA)

## DISABILITY ENABLING NETWORK

- 1) 100 members in DEN but that is indicative of issues on the rise.
- 2) People across business using DEN accessibility event checklist
- 3) Hybrid meetings more common but way manage people online needs to improve.

## BLACK POLICE ASSOCIATION

- 1) Sponsorship Programme support work
- 2) Employee Relations with a specific funded unit
- 3) Consulting with LP on local implementation of PRAP

## 2) Key Challenges & Risks

### NETWORK OF WOMEN

- 1) Pensions- especially for those who worked PT or took extended Maternity leave
- 2) Need to gain more officers members who are young in service

### WELL-BEING NETWORK

- 1) Lack of attendance at the last meet
- 2) Ownership / Crossover with TDW corporate plan meaning people are confused as to the network function.
- 3) Time to complete network work

### CHRISTIAN POLICE ASSOCIATION

- 1) Supervisors to be more supportive on CPA matters or SNA duties
- 2) Where feasible LM/Supervisors prioritise staff morale in order to get the best of their teams

### GYPSY ROMA TRAVELLER NETWORK

- 1) Limited direction from GRTPA - however, now reinvigorating themselves
- 2) The National GRTPA are asking that force GRT Networks merge into areas ie CoLP, MET and BTP networks will become one region. Impact hopefully positive - more members

### DISABILITY ENABLING NETWORK

- 1) Resourcing- Little movement on BDF action plan
2. Adjustment passport- members reporting not user-friendly, different versions CoLP v's COLC
3. Resistance to commitment re reas. adjustment, people left in limbo / nowhere to report
4. Workplace attendance policy

### BLACK POLICE ASSOCIATION

- 1) Lack of protected/dedicated time
- 2) Lack of understanding re importance of equity
- 3) Attendance of BPA at EDI events during worktime. Some supervisors/managers lack of education of entitlements of members and staff.

### 3) Key Decisions / Support Required

**NETWORK OF WOMEN**

- 1) Merchandise and banners required for network
- 2) Timetable of promotion processes would be helpful
- 3) Assistance with demographic data from HR

**WELL-BEING NETWORK**

- 1) Our three priorities for next year
- 2) Recruitment of secretary

**CHRISTIAN POLICE ASSOCIATION**

- 1) To have outlined SNA hours and to be agreed with LMs and circulated
- 2) For continual training on new supervisors/LMs to be trained on how to line manage staff

**GYPSY ROMA TRAVELLER NETWORK**

1. We do not yet have a champion assigned to our network - what is the process for this and would it be possible?

**DISABILITY ENABLING NETWORK**

1. Line Manager training/resources/meeting/CityNet and plan
2. Urgency & resource given to ownership of BDF action plan
- 3) Ownership taken to drive– not lean on networks to raise / fix.

**BLACK POLICE ASSOCIATION**

- 1) Completed Network SOP to be published
- 2) Protected Time to be agreed upon by organisation
- 3) A review of the PRAP communications strategy



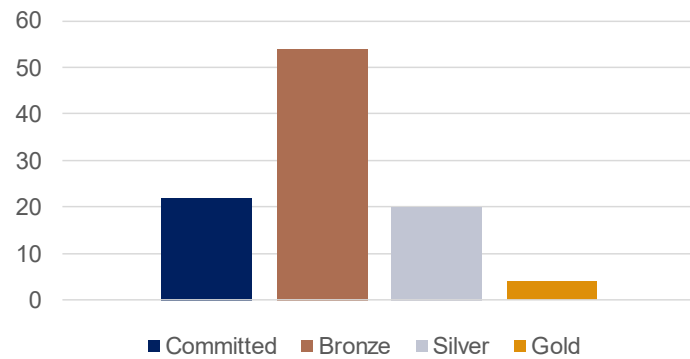
## Inclusive Employers Standard, 2024

Executive summary Review carried out in October 2024



Pillar	Our Score (%)	Industry Average (%)	Gold Submission Average (%)
Engage	67%	56%	94%
Equip	33%	42%	87%
Empower	56%	42%	87%
Embed	48%	40%	81%
Evaluate	44%	42%	81%
Evolve	56%	35%	95%

Submissions by Level



## Where is CoLP today on the IES Standard?

Pillars	Areas of Strength today	Areas of opportunity
<b>Engage</b>	Internal communication Staff Consultation	Diversity data collection and disclosure rates
<b>Equip</b>	All staff training	Policies Management training SLT/Board specific training and development Guidance and support across the employee lifecycle
<b>Empower</b>	Staff empowerment Day to day staff recognition	Impact measurement of events and campaigns Role models and champions
<b>Embed</b>	Corporate values Strategic direction Performance management Recruitment EqIAs	Devolving strategic responsibility to departmental level Expanding on pay gap measurement Impact measurement of current recruitment and career development pathways by characteristic
<b>Evaluate</b>	Data reporting	Action focused goals Closing the feedback loop Return on investment
<b>Evolve</b>	Innovative knowledge sharing Industry role modelling	Strategic direction for networking and knowledge sharing Impact measurement of actions



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# Agenda Item 8

<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Dated:</b> 25 <sup>th</sup> November 2024
<b>Subject:</b> Professional standards, conduct, and vetting Update Q2	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N/A</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>N/A</b>
<b>Report of:</b> Commissioner of Police	<b>For Information</b>
<b>Report author:</b> D/Supt Humphreys/PC Ann Roberts Professional Standards Dept	

## Summary

- Overall, the volume of Complaints has decreased by 3% (one complaint) in comparison to Quarter 1. There has been no change in the volume of new Conduct Cases, with 7 new cases recorded this Quarter, the majority have been assessed as Gross Misconduct.
- 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. However, a number of these cases are set for trial early next year, this may lead to a representative increase in Misconduct Hearings.
- There has been a consistent number of new misconduct investigations, however a decrease in the number of live misconduct investigations. This is attributable to cases being assessed and investigated quicker.
- The Vetting team has now benefitted from an uplift in resources, including increased supervision 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 second quarter of 2024/25 (July - Sept).

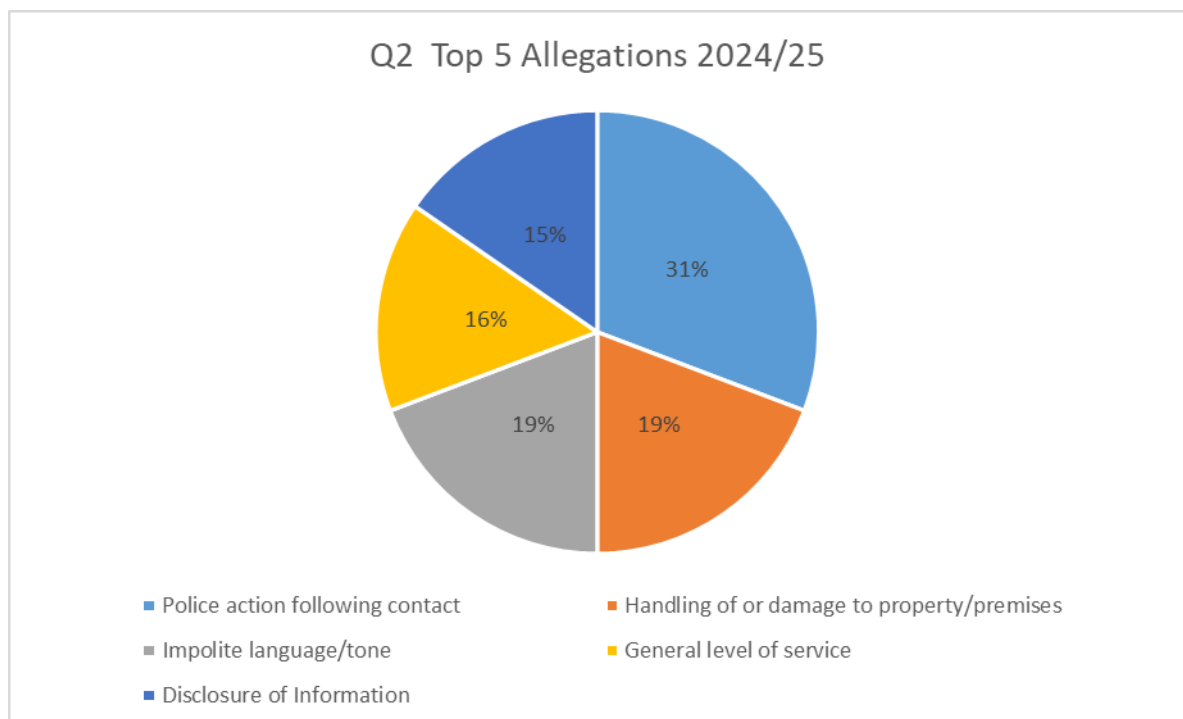
This quarter the total number of CoLP complaint cases logged is 29.

This is separated into 9 dealt with under Schedule 3 of the Police Reform Act 2002 and 20 not within Schedule 3. This figure of 29 complaints is a decrease of one compared against Q1 where a total of 30 complaints were logged; 4 under Schedule 3, and 26 not within Schedule 3. Compared against the same period (Q2) last year 2023/24 the total number of CoLP complaint cases logged was 32. (14 Schedule 3 and 18 not within Schedule 3).

Of the 43 allegations recorded during Q2 2024/25 the highest number were in the categories of: Police action following contact (8) Impolite language / tone (5) Handling of/or damage to property/premises (5) General level of service (4) Disclosure of information (4).

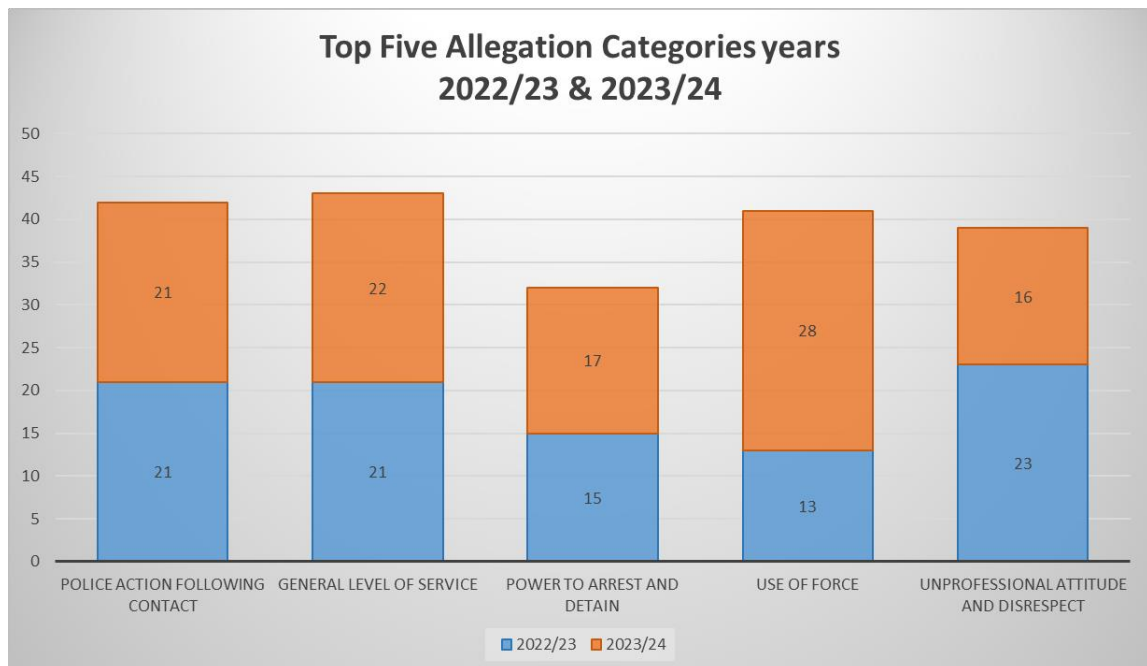
This is a decrease in allegations recorded against Q1 of 1 (2%).

Q2 has 3 out of 5 highest allegation type categories featured in the overall 'Top 5 allegation types' against two years of data which are: General level of service, Police Action following contact, Use of Force, Unprofessional Attitude and Disrespect and Power to arrest and detain. Comparatively Q2, the following allegation types were the highest: Police action following contact (8) Impolite language / tone (5) General level of service (4).



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. 'Use of Force' does not feature in the top 5 of Q2, where only 2 allegations were recorded within this category. The allegation type 'General Level of Service' has

returned to the top five allegations, which feature in both the annual top 5 data 2022/23 and Q2. Handling of/or damage to property/premises also featured as a high allegation category 2023/24 and has returned in Q2 to the top 5.



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 our PSD 'Protect' Plans for pro-active engagement (outlined in the Q1 paper to PSIC). The Protect Engagement function of PSD means that thematic issues and key learning can be shared quickly across relevant areas with interventions implemented as required.

#### Q2 – Data examination: -

Analysis of the highest allegation categories (the latest Q2 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) and communication type allegations which incorporates Impolite language and tone (H) remain the highest areas of complaint type. This is consistent with National data in the IOPC bulletins. In Q2 33% Organisational type allegations were recorded.

The total number of allegations finalised during Q2 is 46 compared to 58 in the previous quarter.

Of the 46 allegations finalised:

- 20 Resolved
- 11 Service provided was acceptable

- 4 Not determined if the service acceptable
- 3 Service Not acceptable
- 6 Not resolved/No further action
- 2 No further action

The 3 allegations finalised where the Service provided was not acceptable relate to 2 cases. One case the allegation type of Evidential Procedures where an HCP (Custody Health Care Practitioners) administered a medical procedure that fell below the required standard. PHL (employer) dealt with the learning for this individual. One case the allegation types Information and Police action following contact, where the officer failed to make any contact with the complainant or deal with a counter allegation made. The officer received Learning by reflection.

To note, cases often contain more than one allegation; the number of cases finalised in Q2 is 27, compared to 38 finalised in Q1.

Of the cases finalised 7 were logged as Schedule 3, and 20 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 13 were finalised. There are currently 34 live conduct investigations, of which 23 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.

13 Conduct matters have been finalised: 2 cases resulted in Case to answer contained 'Reflective Practice' as an outcome, 5 cases resulted in 'No Case to Answer' no action. 1 case was discontinued.

Already reported to PSIC during Q1 but finalised in Q2 - 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.

Two separate accelerated Misconduct Hearings took place during Q2 – both officers had resigned prior to proceedings but were found for Discreditable conduct and would have been dismissed had they not resigned. Both officers have been placed onto the barred list.

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



- Protected Characteristic data: Both within CoLP and nationally, the recording of complainant ethnicity is particularly low. We have spoken to a number of forces, and in using some best practice, we are designing a supplementary questionnaire to be sent to the complainant. The questionnaire is designed to take less than 1 minute to read and complete. It will explain the reason why this information is so important and our commitments to EDI (with a link to our EDI Strategy), and also ask if they can declare their relevant protected characteristic and return to us. We are looking at effective ways to do this, such as through a portal.
- Welfare Strategy: The refreshed welfare strategy to support employees involved in PSD investigations, whether as subject officers, witnesses or victims has submitted for internal consultation. This includes a focus on how the force supports officers to re-integrate back into work and how we can measure the effectiveness of our welfare support through regular, independent de-briefs. We have also been in touch with an independent academic and wellbeing expert who has agreed to act as an critical friend to review our approach.
- Vetting: A separate report on Vetting is provided.

## **II. Forward look**

- Vetting legislative measures: The Home Office have announced that they will introduce legislative measures to strengthen police misconduct and performance regimes, delivering the recommendations of the Home Office's review of police dismissals last year. They have also committed to "overhaul police vetting" following the Angiolini Inquiry's Part 1 report published earlier this year. This package of regulations, to be delivered from early 2025, will:
  - Ensure that officers convicted of certain criminal offences should automatically be found to have committed gross misconduct.
  - Create a presumption of dismissal where there is a finding of gross misconduct.
  - Create a presumption of fast-track hearings for former officers.
  - Streamline the performance system for individual officers.
  - Provide a process for police forces to dismiss officers who cannot hold vetting.
- Vetting Authorised Professional Practice (APP): The new Vetting APP is still awaited following the consultation undertaken earlier this year. During the Culture and Conduct annual conference for PSDs, the Home Office reported that this has

been delayed. However the new APP is expected to have a greater focus on the following areas:

- Protecting the public
- Expectations of the public
- Annual reviews and continuous vetting
- Transferee re-vets
- Risk management strategies
- Decision making
- Appeals

- Presumption of anonymity for firearms officers: Following the shooting of Chris Kaba by NX121. The Home Office has publicised its recognition that the work of armed officers is dangerous and officers, and their families, can potentially become targets for criminality if their identity is revealed following an armed incident. The government will legislate to create a presumption of anonymity for firearms officers who are charged with offences relating to, and committed during, their duties as a firearms officer and who are subject to criminal trial following a shooting, up until the point of conviction. This change will ensure there is a presumption that officers have their anonymity preserved during the court process, whilst also leaving room for judicial discretion in individual cases. The government will carry out technical engagement during the process of drafting measures to ensure they work in practice. The government will bring forward legislation to create this presumption in this Parliamentary session.

- Police Accountability Review: As part of this review the Home Secretary announced that they will establish a wider review to address systemic barriers to timeliness in the misconduct system to improve public and police confidence.. Measures to improve the accountability system will also form part of the government's longer-term work with policing, ensuring that systems can address wider issues with policing performance to improve confidence, not just focusing on individual officer's decisions.

The Home Secretary will establish this review in early 2025 and it is expected to report to her by the end of 2025.

Summary of public complaints data – Q2 2024/25						
Metric	Current quarter (Q2)	Previous quarter (Q1)	Previous year (Q2)	(%) change (Q on Q)	(%) change (Y on Y)	Comment
Complaints – Schedule 3	9	4	14	125%	36%	A total of 29 cases were logged in Q2 2024/25. This is a decrease of 1 case from Q1 2024/25

Complaints – not Schedule 3	20	26	18	23%	11%	The average number of cases logged over the previous 5 quarters is 37 per quarter, Q2 is below average.
Allegations	43	44	69	2%	38%	There were 43 allegations recorded in Q2 2024/25. This is a decrease of 1 allegation from Q1 2024/25

						The average number of allegations over the previous 5 quarters is 59 per quarter. Q1 is below average.
Average time to log complaints (days)	N/K	1	1	%		<i>Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.</i>
Average time to contact complainant (days)	N/K	1	1	%		
Complaints finalised – Schedule 3	7	12	8	42%	12%	

Complaints finalised - not Schedule 3	<b>20</b>	<b>26</b>	<b>12</b>	<b>23%</b>	<b>67%</b>	
Average time to finalise complaint cases (days) – Schedule 3 (NOT including subjudice cases)	<b>N/K</b>	<b>112</b>	<b>140</b>	<b>%</b>	<b>%</b>	<p><i>Timeliness is taken from IOPC published bulletins and available retrospectively.</i></p> <p><i>Q1 is not yet published at time of writing</i></p>

Average time to finalise complaint cases (days) – not Schedule 3	N/K	37	69	%	%	
Applications for review sent to local policing body	N/K	2	1	%	%	
Applications for review sent to IOPC	N/K	1	2	%	%	
	<p><b>Nature of allegations –</b> Of the 43 allegations recorded during Q2 2024/25 the highest number were in the categories of Police Action following contact (8) Impolite language / tone (5) Handling of/or damage to property (5) General level of Service (4) Disclosure of information (4)</p> <p>This is a decrease in allegations recorded against Q1 of 1</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.

Q2 2024/25 contains 4 out of the above top allegation types. Use of Force does not feature this quarter.

#### **Ethnicity and discriminatory behaviour –**

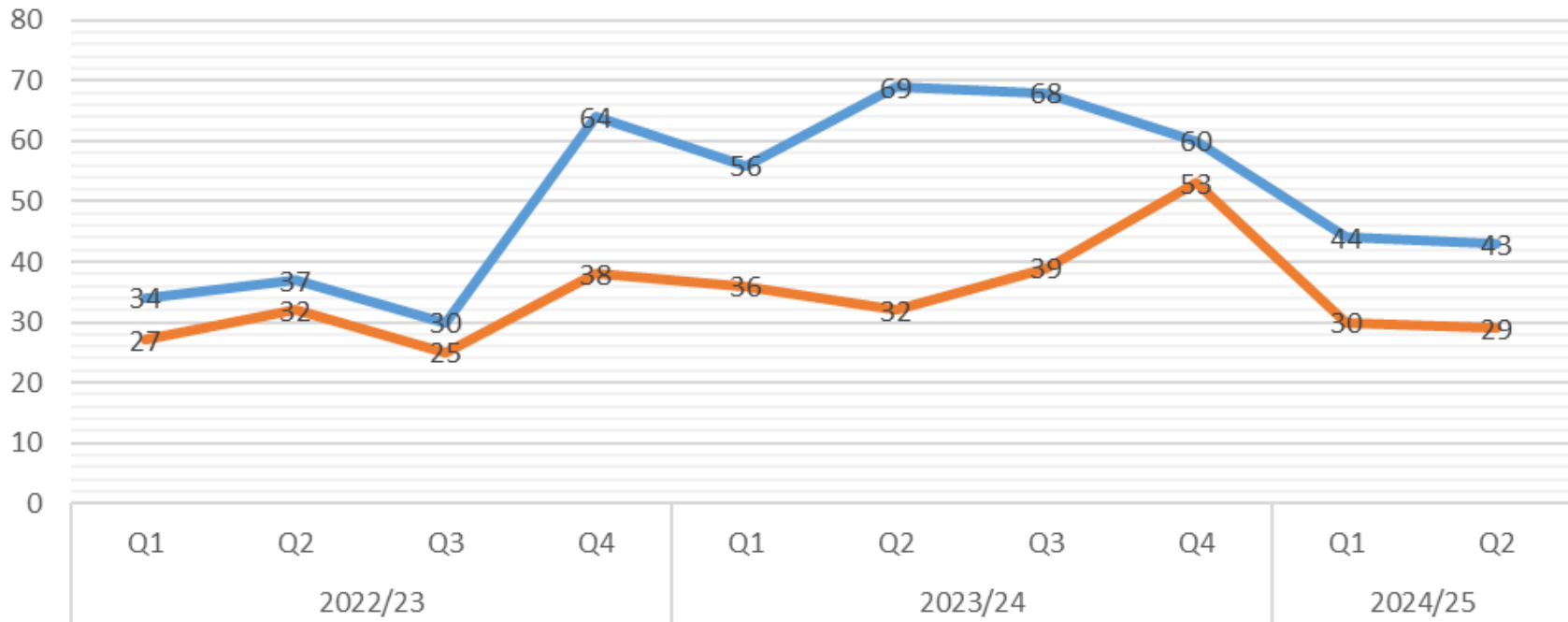
16% of complainant's ethnicity is recorded as Unknown. This is much lower in comparison to Q1. It is difficult to report on any trends, either locally or nationally due to insufficient CoLP or IOPC data. There is no legal requirement for complainants to provide any EDI data and there is a low declaration rate across all Forces/IOPC.

There were three allegations of Discriminatory Behaviour logged during this reporting period. (1 Race, 1 Disability and 1 Gender re assignment).



# City of London Complaint Data

CoLP Allegations Recorded/logged      CoLP Complaints Cases Logged



Summary of internal conduct cases and investigations– Q2 2024/25				
Metric	Number	Previous quarter (Q4)	# (%) change (Q on Q)	Comment
New conduct investigations recorded	7	7	0%	
Total live conduct investigations	36	45	20%	Total live cases of which a number are sub-judice

<i>o.w. gross misconduct</i>	<b>25</b>	<b>25</b>	<b>0%</b>	
Conduct investigations finalised	<b>13</b>	<b>7</b>	<b>86%</b>	<p>2 x Hearing - Dismissal  2 x Accelerated Hearing - Dismissal  1 x Meeting - Written warning  2 x Case to answer  5 x No case to answer  1 x Discontinued</p>
Investigations finalised within <30 days	<b>1</b>	<b>2</b>	<b>50%</b>	Discontinued case

Officers and staff on suspension	20	14	43%	Includes officer under IOPC investigation
Officers and staff on restricted duties	5	6	17%	Includes officer under IOPC investigation
IOPC independent investigations	5	4	25%	Includes Westminster attack
	<b><u>Accelerated misconduct meetings held Q2</u></b>			

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.

One Misconduct Hearing held. Discreditable conduct (drink drive) Case to answer. Finding Gross Misconduct - Dismissed without notice. Placed on Barred list.

**Misconduct meetings / hearings held Q2**

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.

## **Appendices - Public**

Appendix 1- City of London- IOPC complaints bulletin – Q2 (if published)

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**)

<u>Item Type</u>	<u>Hospitality Item</u>	<u>Location type</u>	<u>Directorate</u>	<u>Date</u>	<u>Estimated Value</u>	<u>CoLP Participant(s)</u>	<u>External Organisation</u>	<u>Line Manager Recommendation</u>	<u>Line Manager</u>	<u>Full description of Gift/Hospitality</u>	<u>Location details</u>	<u>Rationale</u>
Hospitality Item	Dinner	Hotel	Chief Officer Team	26/09/2024	£ 53.00	Nik Adams	The Metropolitan and City Police Reserve Forces Association		Pete O'Doherty	Armed Forces Dinner - Accepted	Union Jack Club, Waterloo	Invited as guest of Andrew Spooner (CoLP) - Accepted
Gift Item	NA	Guildhall/Mansion House	National Lead Force Operations	16/09/2024	£ 8.00	Yosra Nouioura	Victim	Accept	Elizabeth Smeed	Chocolate (Black Magic)		Gift from victim
Page 63 Hospitality Item	Invitation to book launch	Office premises (external organisation)	Specialist Operations	12/09/2024	£ 20.00	Philip Waite	Dame Stephanie SHIRLEY CH	Decline	James Green	I have been invited to the launch of a book called, "Autism and the Law" by Adam FEINSTEIN at the publishers address in paternoster Square. I was involved in some of the research for this book with the author. The book launch is to consist of drinks and light refreshments.	Katten Muchin Rosenman UK LLP, Paternoster House, 65 St Pauls Churchyard, London, EC4M 8AB	I assisted the author in his research into how people with Autism are treated and safeguarded whilst in Police detention.

Hospitality Item	Lunch	Guildhall/Mansion House	Chief Officer Team	04/09/2024	£ 20.00	Nik Adams	City of London Corporation		Pete O'Doherty	Police Authority Board Lunch	Guildhall Dining Room	Lunch following PAB - accepted
Hospitality Item	Lunch	Restaurant	Chief Officer Team	06/08/2024	£ 30.00	Pete O'Doherty	Bloomberg	Accept	Nik Jethwa	Business lunch with Head of Security Operations, Bloomberg.		Business lunch with stakeholder, to refuse would cause offence. No attachment, calendar invite only.
Page 64 Hospitality Item	Dinner	Bar/Pub	Corporate Services	30/07/2024	£ 160.00	Anthony Fletcher	Motorola Solutions Inc, Mary Dubois Product Manager	Accept	Daniel Farr	Dinner to be provided following a meeting with Motorola Solutions as part of our contractual quarterly service review. To continue good relations with a supplier. To refuse could cause offence. Staff Present TPS Fletcher, Dan Farr,, PC Amey and Alan Gardiner	Bodeans 16 Byward Street London	Dinner to be provided following a meeting with Motorola Solutions as part of our contractual quarterly service review. To continue good relations with a supplier. To refuse could cause offence. Staff Present TPS Fletcher, Dan Farr,, PC Amey and Alan Gardiner.



<p>Hospitality Item</p>	<p>Motorola Solutions User Forum 2024</p>	<p>Hotel</p>	<p>Corporate Services</p>	<p>30/07/2024</p>	<p>£ 2,000.00</p>	<p>Anthony Fletcher</p>	<p>Motorola Solutions Inc, Mary Dubois Product Manager</p>	<p>Accept</p>	<p>Paul Lilley</p>	<p>Invite for five persons from CoLP to attend the Motorola Solutions Software User Forum 2024 in Manchester  This is an annual event provided by Motorola per contract. We are in contract for BWV and Pronto hence four places. The conference took place 30/09/2024 - 02/10/2024. Included is food and refreshments plus two nights accommodation. Approx value of £200 each per day. Officers and staff that attended are as follows :- Dan Farr, TPS Ant Fletcher, PC Ryan Tullett, PC Rob Amey and Sandeep RumpalThe event includes demonstrations</p>	<p>Hilton Deansgate, Manchester UK</p>	<p>Forms part of our working relationship with an existing supplier and is part of the service relationship. Provides an opportunity for networking with other forces and for meeting the supplier and learning about new products.</p>
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										of the technology, case studies by UK forces and a networking event. The hospitality included an evening pre drink and dinner reception on day one plus overnight accommodation breakfast, Lunch, dinner and drinks on day two and three of this two day conference.		
Hospitality Item	Lunch	Restaurant	Corporate Services	22/07/2024	£ 12.00	Patrick Holdaway	Iona Blake, BP	Accept	Alix Newbold	Lunch with a business contact.	Mister Lasagna	Retail crime contact - business crime catch up.
Hospitality Item	Lunch	Office premises (external organisation)	Chief Officer Team	22/07/2024	£ 15.00	Pete O'Doherty	Deloitte	Accept	Nik Jethwa	Working lunch with Deloitte team (external partners) to progress previous matters from workshops. Lunch was at their in-house 'restaurant'.		Lunch offered as part of the business meeting and accepted on that basis. No attachment as no formal invitation (just calendar).

Hospitality Item	Invitation to a work party	Bar/Pub	National Lead Force Operations	19/07/2024	£ 60.00	Alexander Eristavi	David Clarke, CSO, Guildhawk		Oliver Little	an invitation for two to attend a corporate party, received from ex-boss, retired Det Supt David Clarke, now CSO of Guildhawk a corporate business in the City.	Byward Kitchen and Bar	I have kept in touch with my boss and his wife who is the CEO of Guildhawk both on social and professional level as their company works with anti-fraud community. The invitation is for two, for my wife and I and I would estimate the cost approximately £30 per person
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Gift Item	Gift card	Restaurant	Local Policing	19/07/2024	£150.00	Christine Phillips	8 year old boy named Alex Gross who was with his father	Accept	Kerry Goodwin	£150 gift care for Eataly	Eataly	Officers were on a Stop the Bleed stand outside Monument Station. An 8 year old boy who was with his father came to the stand and fainted while he was there. Officers gave first aid and bought a bottle of water for him. His father wanted to give me money for the water which I refused to take. They were going to have lunch and returned to the stand later and the boy gave me an envelope and said that it was a thank you for all four officers who were on the stand. After he left we opened the envelope and found a thank
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											you card with a message of thanks and a gift card to the value of £150 for Eataly. Officers on stand: Christine Phillips, David Jarvis, Manjit Kambo and Will Skilling	
Hospitality Item	Dinner and drinks	Hotel	Chief Officer Team	11/07/2024	£ 100.00	Nik Adams	Police Federation		Pete O'Doherty	Police Federation Bravery Awards	Royal Lancaster Hotel, Lancaster Terrace, London W2 2TY	COLP NOT NOMINATED SO DON'T NEED TO ATTEND - APOLOGIES SENT

Hospitality Item	Summer Drinks	Office premises (external organisation)	Chief Officer Team	05/07/2024	£ 20.00	Nik Adams	City of London Crime Prevention Association		Pete O'Doherty	City of London Crime Prevention Association Summer Drinks 2024	Investec, 30 Gresham Street, London EC2V 7QP	Declined
Hospitality Item	Tickets for Cricket match	Sporting venue	Corporate Services	03/07/2024	£ 30.00	Patrick Holdaway	Nick Gargan - consultant		Alix Newbold	Offer to join a group of business colleagues at a cricket match in London.	Vauxhall Cricket Ground	

## 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	Commissioner	Pete O'Doherty	London Cyber Resilience Centre	Non-Exec Director

8	17/05/2024	Commissioner	Pete O'Doherty	Sprite Plus Advisory Board (Academic Working Group)	Member
9	17/05/2024	Commissioner	Pete O'Doherty	Abertay cyber Quarter, Abertay University	Advisor
10	17/05/2024	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	10/09/2024	Service Delivery Director	Chris Bell	Negative / No Organisations	N/A
16	10/09/2024	Assistant Commissioner	Paul Betts	Negative / No Organisations	N/A
17	10/09/2024	Commander	Umer Khan	Negative / No Organisations	N/A



By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

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7)	Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.
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Appendix 4-  
OFFICIAL

**Suspended officers Q2**

	• Investigator	• Matters of significance	• Current Situation Report
CM/15/24	PSD	Domestic abuse reported by 3 <sup>rd</sup> party (violence against child in family)	Assessed as Gross Misconduct (GM)  Suspended from duty  Regulations served.
CM/13/24 & CM/14/24	PSD	Two officers assessed to linked incident.  1) Allegation of sexual assault by a PC against a colleague off duty. Under criminal investigation by another force, currently sub judice. 2) When incident reported to another line manager, they failed to record or report and made inappropriate comments.  Both cases currently sub judice pending another force’s criminal investigation.	Both officers:  Assessed as Gross Misconduct (GM)  Suspended from duty  Regulations served.
CM/11/24	PSD	Victim reported PC ex-partner for Controlling and Coercive behaviour, rape, sexual assault and acquiring the services of sex workers.  Sub judice pending another force’s criminal investigation.	Assessed as Gross Misconduct (GM)  Suspended from duty  Regulations served.

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7)	Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.
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CM/7/24	PSD	Allegation around culture within a specific unit. It is alleged that Officers made a number of discriminatory comments within the office. Some of these in the presence of supervisors). Six officers (including supervisors) suspended.	<p><b>Assessed as Gross Misconduct (GM)</b></p> <p><b>Suspended from duty</b></p> <p><b>Regulations served.</b></p>
CM/5/24	PSD	The circumstances are that security at Bloomberg have received a complaint from their Human Resource department that a female staff member has been the victim of workplace harassment from a City of London Police officer whilst they were on duty.	<p><b>Assessed as Gross Misconduct (GM)</b></p> <p><b>Suspended from duty</b></p> <p><b>Regulations served.</b></p>
CM/45/23	PSD	It is alleged an Acting/PS displayed sexualised, inappropriate, misogynistic behaviour to female officers.	<p><b>Assessed as Gross Misconduct (GM)</b></p> <p><b>Suspended from duty</b></p>
CM/40/23	PSD	Acting/PS charged for sexual assault. The allegation is that of sexual assault on a female Police officer committed when off duty. Case awaiting trial.  Sub judice pending another force's criminal investigation.	<p><b>Assessed as Gross Misconduct (GM)</b></p> <p><b>Suspended from duty</b></p> <p><b>Case sub judice</b></p>

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7)	Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.
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CM/36/23	PSD	PC subject to a criminal Fraud investigation.	<p><b>Assessed as Gross Misconduct (GM)</b></p> <p><b>Suspended from duty</b></p>
CM/28/23 PC	PSD	Officer under investigation for a variety of infringements in relation to selling items with CoLP insignia for personal gain, non-declaration of gifts and service and attending events during working hours without authority. Numerous occasions of failing to adhere to orders and instructions.	<p><b>Assessed as Gross Misconduct (GM)</b></p> <p><b>Suspended from duty</b></p> <p><b>Regulations served.</b></p>
CM/37/22 PS TFG	PSD	Sexual assault / digital penetration criminal investigation.  PC charged with x2 counts of sexual assault and sexual assault by penetration. Awaiting court trial.	<p><b>Assessed as Gross Misconduct</b></p> <p><b>Suspended from duty</b></p> <p><b>Regulations served.</b></p>
CM/17/22 PC LOD	PSD	Alleged that PC touched four female student officers in a sexual manner knowing or being reckless to the fact that such contact was without the permission or consent of the officer. Awaiting conduct hearing.	<p><b>Assessed as Gross Misconduct</b></p> <p><b>Suspended from duty.</b></p> <p><b>Regulations served.</b></p>

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7)	Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.
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<b>CM/2/22</b>  <b>PC</b>  <b>UPD</b>	PSD	Charges issued by Surrey police for 2 x rape and 1 x ABH. PC appeared at Guildford CC on the 5th Jan 24. Not guilty plea has been entered. Case has been adjourned with unconditional bail.  5 day trial set for 3rd February 2025.	<b>Assessed as Gross Misconduct</b>  <b>Suspended from duty</b>  <b>Regulations served.</b>
<b>CM/12/24</b>  <b>PC</b>  <b>UPD</b>	PSD	Inappropriate sexualised and homophobic comments to colleagues.	<b>Assessed as Gross Misconduct</b>  <b>Suspended from duty</b>  <b>Regulations served.</b>
<b>CM/04/24</b>  <b>SC</b>	PSD	Special Constable under criminal investigation by another force for National Security related offences.  Sub judice pending outcome of trial.	<b>Assessed as Gross Misconduct</b>  <b>Suspended from duty</b>  <b>Regulations served.</b>

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**Restricted Officers Q2**

Case details	Investigator	Matters of significance	Current Situation Report
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7)	Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.		
CM/01/24 & CO/103/24	IOPC	Allegation of misuse of police powers and discriminatory behaviour stop check	IOPC independent <b>Restricted</b> Not to have any public facing or operational role. Not to enter the evidence chain.
CM/37/23	PSD	Whilst off duty, PC has been 'beeped' at by a female driver whilst out with her children. PC has responded by approaching the vehicle in a threatening manner and shown his warrant card. He has used expletive language.  This has been assessed as Gross Misconduct.	<b>Restricted</b> Not to have any public facing or operational role. Not to enter the evidence chain.  Not to have any contact with those that may be involved in the incident.
CM/32/23	PSD	Essex police have conducted a criminal investigation following a disclosure an officer made regarding an incident involving one of his children (amounting to assault). This was a dual agency investigation involving social services. Essex police concluded their investigation with no further action required, however social services remain involved with the family. A misconduct investigation remains ongoing.	<b>Restricted</b> No public contact No involvement with any investigation involving vulnerable people or children. To remain under close supervision To fully engage with the welfare officer and other support services
CM/20/23	IOPC	IOPC Carrick scoping review required a conduct recording and referral for a CoLP officer who was working for the Met Police at the time of the incident. This is independent investigation. Now assessed as Misconduct.	<b>Restrictions:</b> Not to be involved in decision making relating to any professional standards cases Not to act as decision maker in any sexual offences allegations

**NOT FOR PUBLICATION**-This report is exempt by virtue of the paragraph 7 of Part 1 of Schedule 12A of the Local Government Act 1972. This Appendix contain sensitive information which may be exempted under the Act, and as this cannot be presented to Members as a separate appendix this report needs to be considered in closed session. It is considered that information falling under the following paragraphs outweighs the public interest in disclosing information.

7)	Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.
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CM/2/24	PSD	<p>PC arrested by TVP for drink drive offences following a road traffic collision. PC appeared on 9<sup>th</sup> July 24 at Milton Keynes Mags whereby he pleaded guilty. He was issued with an 18-month ban.</p> <p>AMH – Hearing took place on the on the 21<sup>st</sup> August 2024 where T/Cmsr O’Doherty found that had officer been a serving officer he would have been dismissed and placed on the barred list.</p> <p>(details already provided in Q1 PSIC)</p>	<p><b>Assessed as Gross Misconduct</b></p> <p><b>** Officer has resigned**</b></p>
PC			



By virtue of paragraph(s) 3, 7 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

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<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Dated:</b> 25 <sup>th</sup> November 2024
<b>Subject:</b> Police Conduct Reviews - Random Sample	<b>Non-Public report:</b> For Information
<b>This proposal:</b> <ul style="list-style-type: none"> <li>• provides statutory duties</li> </ul>	Public trust and confidence
<b>Does this proposal require extra revenue and/or capital spending?</b>	No
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	N/A
<b>Report of:</b>	Assistant Commissioner Betts
<b>Report author:</b>	Detective Superintendent Carly Humphreys

## NOT FOR PUBLICATION

This report is exempt by virtue of the following paragraph of Part 1 of Schedule 12A of the Local Government Act 1972. Specifically, the appendix of the report contain sensitive information which may be exempted under the Act, and as this cannot be presented to Members as a separate appendix this report needs to be considered in closed session. It is considered that information falling under the following paragraphs outweighs the public interest in disclosing information:

7)	Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.
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### Summary

The Professional Standards Department provides a randomised sample of finalised complaint investigations for the Committee to review. These investigation summaries have been anonymised, however provide information in connection with the investigation of a complaint, alleged misconduct or a death or serious injury following police contact.

The purpose of providing these investigation summaries in the form of Police Committee Reports, is to ensure that this committee can fulfil its requirements to scrutinise the force's handling of complaints; where appropriate, conducting reviews of complaints handled by the force; monitoring the force's work in respect of conduct.

## **Recommendation(s)**

Members are asked to:

- Note the report.

## **Appendices**

- Appendix 1 – PCR CM.11.23
- Appendix 2 – PCR CM.10.23
- Appendix 3 – PCR CM.21.23
- Appendix 4 – PCR CM.02.24
- Appendix 5 – PCR CM.31.23

## **Carly Humphreys**

Detective Superintendent Carly Humphreys  
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**Professional Standards Directorate  
Police Committee Report**



**Ref No: CM/11/23**

**Summary:**

On 16/06/2023, the City of London Police were made aware of a complaint regarding a Police Officer. This complaint was initially made to another force, regarding the historic conduct of the officer in their previous employment within the other force. This complaint was then passed to CoLP as the officer had since transferred and now worked for CoLP.

In 2010, the officer initially engaged with the complainant through his duties, responding to a call for assistance as the complainant was a victim of crime. The complainant was under 18 at the time.

Following this, using details obtained from the Police crime report, the officer located and contacted the complainant on Facebook multiple times, in an overly friendly flirtatious manner.

The officer was served Notice of being under investigation for Gross Misconduct and suspended from duty. The officer accepted the allegation as made by the Complainant and resigned.

A formal Hearing was held at CoLP, where the Panel found that the former Officer had been responsible for 7 breaches of Standards of Professional Behaviour namely;

- Discreditable Conduct and
- Authority, Respect and Courtesy

The accumulation of these breaches amounted to Gross Misconduct and the former officer would have been 'Dismissed Without Notice' had they not resigned. The officer has been added to the list of those barred from seeking employment with other Police Agencies.

**Organisational Learning:**

None

**Individual Learning**

N/A

**Referral to IOPC**

Yes - Mandatory

**Mode of Investigation**

Local

**Appeal Received**

No

**Misconduct or Gross Misconduct**

Gross Misconduct

**Case to Answer**

Yes - Misconduct Hearing

**Sanction**

Dismissal

**Number of days taken to complete the investigation: 409**

Professional Standards Directorate  
Police Committee Report



**Ref No:** CM/10/23

**Summary:**

This matter relates to a Police Officer's driving manner on duty in a police vehicle. The officer used his police vehicle to carry out a 'compliant stop' and has used blue lights to conduct such a stop.

The officer also contravened automated traffic signals and road traffic regulations whilst responding to an emergency call despite not being trained in response driving to utilise these techniques.

This matter was assessed as Gross Misconduct. Following a full investigation, a determination was made that this matter could be heard at a misconduct meeting rather than a hearing. This was based on the remorse demonstrated by the officer.

A Misconduct meeting was held resulting in a written warning for the manner of driving and RPRP for the compliant stop.

**Organisational Learning:**

None

**Referral to IOPC**

No

**Mode of Investigation**

Local

**Appeal Made**

No

**Misconduct or Gross Misconduct**

Misconduct

**Case to Answer**

Yes - Misconduct Meeting

**Sanction**

Written Warning and RPRP

**Number of days taken to complete the investigation: 230**



Professional Standards Directorate  
Police Committee Report



Ref No: CM/21/23

**Summary:**

Between 1<sup>st</sup> March 2022 and 7<sup>th</sup> November 2023, a police officer sent sixty-nine emails from their City of London Police email address to their personal email account. A number of these emails were marked as 'Official' and 'Sensitive'.

The matter was assessed as Misconduct.

The officer went through the emails and confirmed that two should have remained in force, and remainder of the emails had been widely disseminated outside policing. The officer acknowledged that force policy had been breached and sincerely apologised. They did not realise they were breaching the policy and wouldn't have done so if they had known.

This matter was dealt with by Practice Requiring Improvement (PRI).

**Organisational Learning:**

None

**Referral to IOPC**

No

**Mode of Investigation**

Local

**Appeal Made**

No

**Misconduct or Gross Misconduct**

No

**Case to Answer**

No

Sanction

N/A

Number of days taken to complete the investigation: 289

**Professional Standards Directorate  
Police Committee Report**



**Ref No: CM/02/24**

**Summary:**

On Saturday 6th April 2024, a Police Constable from the Local Policing Directorate was off duty, driving their car when they became involved in a road traffic collision. The officer had collided with street furniture in the road, causing their vehicle to turn over onto its roof.

Upon being located in the vicinity of the collision, the officer was arrested by Thames Valley Police on suspicion of driving a vehicle whilst unfit through drink or drugs contrary to section 4 of the Road Traffic Act 1988.

The officer was taken by officers to hospital. At the hospital, a blood sample was taken from the officer by a healthcare professional and was subsequently submitted for analysis. The result indicated that the officer was significantly over the prescribed limit of alcohol in their system.

Following the incident, the officer made several disclosures to both Thames Valley Police officers at the scene and City of London Police colleagues which indicated the fact they were driving the vehicle whilst under the influence of alcohol.

The circumstances of this incident were subject to a severity assessment which determined that if proven, the allegation amounted to Gross Misconduct.

The officer was charged and pled guilty to 'driving whilst over the prescribed alcohol limit.' They were given an 18 month driving ban and were fined.

In light of the conviction, and the incontrovertible evidence in existence, the case was deemed suitable for an Accelerated Misconduct Hearing. The officer resigned from the force before the accelerated hearing took place. The accelerated hearing occurred in the officer's absence on Wednesday 21<sup>st</sup> August 2024, and the commissioner found that Gross Misconduct was proven and that the officer would have been dismissed if they had still been a serving officer.

**Organisational Learning:**

None

**Mode of Investigation:**

N/A

**Appeal Made:**

**CITY OF LONDON POLICE: OFFICIAL**

No

**Misconduct or Gross Misconduct:**

Gross Misconduct

**Case to Answer:**

Yes - Misconduct Hearing

**Sanction:**

Dismissal (If still serving) and placed on the College of Policing Barred List.

**Number of days taken to complete the investigation:**

137

Professional Standards Directorate  
Police Committee Report



Ref No: CM/31/23

**Summary:**

This conduct matter was born from another linked investigation whereby the officer was a witness to an incident of drinking on duty.

It was established during the investigation the officer failed on multiple occasions to reasonably bring material to the attention of the PSD investigator. The officer also provided information that was suspected to be incorrect and it was deemed that they were deliberately attempting to frustrate the PSD investigation. These allegations were assessed as Gross Misconduct.

A full investigation was carried out and it was found there was no evidence to suggest the officer had deliberately withheld information from the Investigating Officer, and it was not substantiated that the information provided was deliberately incorrect.

The matter was then assessed by the Appropriate Authority and determined as one of no further action.

**Organisational Learning:**

None

**Referral to IOPC**

No

**Mode of Investigation**

Local

**Appeal Made**

No

**Misconduct or Gross Misconduct**

No

**Case to Answer**

No

Sanction

N/A

Number of days taken to complete the investigation: 183