CITY OF LONDON

Professional Standards & Integrity (Police) Committee

Date:	**THURSDAY, 6 FEBRUARY 2025**
Time:	11.00 am
Venue:	**COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL**

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

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

Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

1.   **APOLOGIES**

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

3.   **MINUTES**

   To approve the public minutes and non-public summary of the meeting held on 25 November 2024.

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For Decision
(Pages 5 - 8)

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4.   **PUBLIC OUTSTANDING REFERENCES**

   Joint report of the Town Clerk and Commissioner.

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For Information
(Pages 9 - 10)

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5.   **STOP & SEARCH YEARLY REVIEW FOR 2024**

   Report of the Commissioner.

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For Information
(Pages 11 - 22)

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6.   **Q3 STOP AND SEARCH AND USE OF FORCE UPDATE**

   Report of the Commissioner.

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For Decision
(Pages 23 - 30)

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7.   **EQUITY DIVERSITY AND INCLUSIVITY UPDATE**

   Report of the Commissioner.

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For Information
(Pages 31 - 72)

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8.   **SUMMARY OF ACTION FRAUD PUBLIC COMPLAINTS DATA- Q3 2024/25**

   Report of the Commissioner.

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For Information
(Pages 73 - 96)

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9. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q3**

Report of the Commissioner.

For Information
(Pages 97 - 132)

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

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

12. **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

13. **NON-PUBLIC MINUTES**

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

For Decision
(Pages 133 - 134)

14. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE NON-PUBLIC APPENDICES**

Report of the Commissioner. To be read in conjunction with item 9

For Information
(Pages 135 - 146)

15. **UPDATE ON TEAM CULTURAL AUDIT PILOT**

Report of the Commissioner.

For Information
(Pages 147 - 160)

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

Report of the Commissioner.

For Information
(Pages 161 - 180)

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

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

PROFESSIONAL STANDARDS & INTEGRITY (POLICE) COMMITTEE
Monday, 25 November 2024

Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Monday, 25 November 2024 at 11.00 am

Present

Members:
Michael Mitchell (Chair)
Deputy Madush Gupta
Naresh Hari Sonpar
Jacqui Webster

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

City of London Police
Assistant Commissioner Paul Betts   -   City of London Police
Superintendent Carly Humphreys   -   City of London Police
Chief Superintendent Sanjay Andersen   -   City of London Police
Superintendent Kate MacLeod   -   City of London Police
Emma Cunnington   -   City of London Police
Chief Inspector Dan Murphy   -   City of London Police
Luca Filipi   -   City of London Police

1. **APOLOGIES**
    Apologies were received from James Thomson. Joanna Abeyie, Jason Groves and Florence Keelson-Anfu were observing online.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
    There were no declarations.

3. **MINUTES**
    RESOLVED, - that the minutes of the meeting held on 25 September 2024 were approved as an accurate record, subject to the addition of apologies from Madush Gupta.

4. **PUBLIC OUTSTANDING REFERENCES**
    Members received a joint report of the Commissioner and the Town Clerk which set out the public outstanding references.
    Officers agreed to submit the Equity Diversity and Inclusion Strategy's performance dashboard to the Professional Standards and Integrity (PSI) Committee in February 2025.
    RESOLVED, - that the report be noted.

5. **QUARTERLY STOP AND SEARCH AND USE OF FORCE UPDATE (Q2)**
Members received a report of the Commissioner which provided a quarterly update on stop and search and use of force data for Q2 2024 – 2025.
Members queried the cause of the increase in disproportionality of Black people affected by use of stop and search. Officers outlined that the ongoing research conducted by the University of East London would provide further context but was not yet available. The Chair requested that any interim updates on the research be shared with the Police Authority Team.
RESOLVED, - that the report be noted.

6. **SUMMARY OF ACTION FRAUD PUBLIC COMPLAINTS DATA- Q2 2024/25**
Members received a report of the Commissioner which provided a summary of the Action Fraud public complaints data for Q2 2024/25.
Officers outlined that the Action Fraud service would be replaced by a new system which would monitor complaints data. The Chair requested that this would be revisited in 2025, and Officers queried the appropriate governance structure to monitor this work. It was outlined that a wider governance review was in progress and would consider the most appropriate Committee to oversee and scrutinise this work.
RESOLVED, - that the report be noted.

7. **EQUITY, DIVERSITY, INCLUSIVITY (EDI) UPDATE**
Members received a report of the Commissioner which provided an update on Equity, Diversity and Inclusivity in City of London Police.
Members discussed the use of online training modules and encouraged officers to include online learning opportunities in addition to in person training for staff. Members queried if the team coordinating the Equity, Diversity and Inclusion Strategy and associated work was adequately resourced. It was outlined that a Business Planning Process had recently been undertaken to assess the demand and capacity across the entire Force, which had found no need for an uplift in establishment for this particular team. It was noted that careful prioritisation would be required to increase the establishment in this particular team, as resource would have to be taken from other areas of the organisation. The Chair noted the significant work from a small team of officers, thanked them for their continued efforts and stressed the importance of this Committee seeing an implementation plan for the EDI Strategy.
RESOLVED, - that the report be noted.

8. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q2**
Members received a report of the Commissioner which provided an update of professional standards conduct and vetting for Q2 2024/25.
Members queried the speed and efficiency of the review and noted the length of time taken to work through the recommendations of reviews. The Chair requested frontline training data on the top 5 allegation categories and the impact of this training.
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 25 September 2025 were approved as an accurate record.

13. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q2 - APPENDIX 4**
    Members received a report of the Commissioner which provide a non-public appendix to the professional standards, conduct and vetting update which was considered in conjunction with item 8.

14. **VETTING - PROGRAMME OF CONTINUOUS IMPROVEMENT**
    Members received a report of the Commissioner which provided outline of the vetting programme of continuous improvement.

15. **POLICE CONDUCT REVIEWS - RANDOM SAMPLE**
    Members received a report of the Commissioner which provided a random sample of police conduct reviews.

16. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
    There were no questions.

17. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
    There was no other business.

The meeting ended at 12:33pm

 Chairman

Contact Officer: Kezia Barrass
Kezia.Barrass**@cityoflondon.gov.uk**

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PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

PUBLIC OUTSTANDING REFERENCES

8/2023/P	7th November Item 7 Quarterly Equality and Inclusion Update	Members noted that officers aimed to have a one-page dashboard capturing the key points on evaluation and reporting, and the Chair requested that this be ready for the Committee's February meeting	Commissioner	**In Progress -** This remains a work in progress, the EDI Performance Pack / Dashboard continues to evolve and will capture these metrics as we develop our work in this area. At this time Year 1 activities have been prioritised – more time will be dedicated towards the mapping for Years 2 and 3.
	September 2024 – Item 6 EDI Update	Chair requested to meet staff networks in most appropriate capacity and hear feedback.	Commissioner	**In Progress –** Work is underway to progress this action. A meeting was scheduled in October but was not able to take place.
	November 2024 – Item 5 Quarterly stop and search update q2	Officers agreed to share interim updates from University of East London research as available with the Police Authority team	Commissioner	**In Progress -** An update on this action is contained within the Stop and Search Annual Review paper. Students from the University of East London will be visiting Bishopsgate Police Station again in late February 2025 to review body worn video and dip sample stop and search forms. Any feedback and further findings from academic research will be reported to Members through the usual governance channels

Committee(s): Professional Standards and Integrity Committee	Dated: 6 February 2025
Subject: Stop & Search Yearly Review for 2024	**Public**
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1- People are Safe and Feel Safe
Does this proposal require extra revenue and/or capital spending?	**N/A**
If so, how much?	**N/A**
What is the source of Funding?	**N/A**
Has this Funding Source been agreed with the Chamberlain's Department?	**N/A**
Report of: Commissioner of Police	**For Information**
Report author: T/Supt J Wynne, Taskforce and S&S Lead	

Summary

This paper provides an overview of City of London Police's current position regarding Stop & Search and Use of Force, focussing on performance, governance, scrutiny, and training provision, as well as mapping out the strategic direction for the next 12 months. We have low disproportionality rates, strong scrutiny both internally and externally and amongst the best outcome rates in the country. We work on a continuous improvement programme through a robust governance structure.

Recommendations

Members are asked to:

- Note the report.

Main Report

Background

1. The appropriate use of stop & search can be a powerful tool in the building of trust and confidence and tackling criminality and violence. Therefore, it is essential that when the police use search powers, they are used only where reasonable grounds exist and in a way that is in line with procedural justice principles.

2. The City of London Police place significant emphasis on Procedural Justice Theory in its approach to the use of police powers. The premise being that

when the police are fair and respectful, they gain trust, legitimacy and cooperation. All four elements of procedural justice are relevant to stop and search.

a. Voice: encouraging people to be heard and participate yields positive outcomes. Individuals report higher satisfaction when they can explain their side of the story and participate in decisions, even if they cannot determine the outcome. This could be as simple as an officer asking someone to recount events before conducting a search or inviting questions at the end of a search.

b. Dignity and respect: the public react negatively when officers display dismissive or demeaning behaviour (Murphy and Barkworth, 2014). This includes using a loud voice, interrupting and making critical or condescending comments (Jonathan-Zamir and others, 2015). On the other hand, treating people with dignity and respect conveys a sense of value and social worth (Tyler, 2004). This is particularly crucial when exercising such an intrusive power as stop and search.

c. Trustworthy motives: people want to believe that the police are sincere and focused on their needs and concerns. Trustworthy motives concern how police justify their power to the public. For example, when using stop and search in an area suffering from high knife crime, officers should emphasise that searching people and removing knives from the streets is in the community's best interests.

d. Neutrality: the public wants to know that they have been stopped and searched based on objective information rather than any personal characteristics. Officers should clearly explain to the individual why they have been stopped, the grounds and the object of the search (Tyler, 2004).

3. The City of London has a small residential population (approx. 9000), compared to its largely transient worker and visitor population which sees this number swell to 600,000 people a day with around 21 million visitors a year. This provides a unique policing environment compared to all other Police Forces within England and Wales, with challenges in the identification of, and engagement with our community and the large majority of those who are stopped and searched in the city are not residents of the City of London.

National reports and accountability – IOPC and HMICFRS PEEL Assessment Framework

4. The College of Policing (CoP) sets out guidance for forces in its Authorised Professional Practice (APP) for Stop and Search and Use of Force. The City of London Police regularly review this and use it to define our local policy and

approach. The guidance can be found at the following link: [Stop and search | College of Policing](#).

5. The Independent Office for Police Conduct (IOPC) also publish reports identifying lessons emerging from their oversight of the complaints and misconduct system. For example, in late 2023 the IOPC published a report into Stop and Search which contained national recommendations ranging from the quality of interactions to external scrutiny provisions. The City of London Police have reviewed these and where appropriate have improved service, such as in the sharing of BWV footage of stop and searches with scrutiny and oversight groups. and the roll-out of CoP Personal Safety curriculum. This has resulted in fewer complaints, a reduction in the use of force and less reports of Op Hampshire (assaults on officers).

6. Lastly, HMICFRS use the PEEL Assessment Framework (PAF) in its inspection of forces, providing a consistent and accessible benchmark against which forces can be assessed and map out improvements. The relevant areas for Stop and Search and Use of Force are as follows:

   a. **The workforce interacts with the public fairly and respectfully.**

   - Officers are effective at communicating and interacting with the public without bias. They consider the needs of their communities.

   - In line with its policy and national mandates, the force uses body-worn video in all appropriate use of force and stop and search encounters. Interactions between officers and the public are improved as a result.

   b. **The force uses stop and search powers fairly and respectfully.**

   - The force makes appropriate use of stop and search as an investigative tactic and can show that its use is fair and effective.

   - The force acts upon scrutiny and challenge it receives from an external independent forum to improve officers' use of [stop and search powers](#).

   c. **Officers' use of force is fair and appropriate.**

   - The force understands how, and with what impact, its officers use force and can show that it is fair and appropriate.

   - The force acts upon scrutiny and challenge received from an external independent forum to improve how officers use force This is fed back into both the Strategic and Tactical Scrutiny Groups for capturing any learning and for consideration of implementation of updating training.

Performance, internal supervision and dip sampling, and governance

7. This section details the recent performance of City of London Police, focussing on outcome and disproportionality rates, before moving onto an overview of our internal supervision, dip sampling, and governance in place to ensure we understand and continually improve our approach. It also presents high-level overview of public complaints in this area.
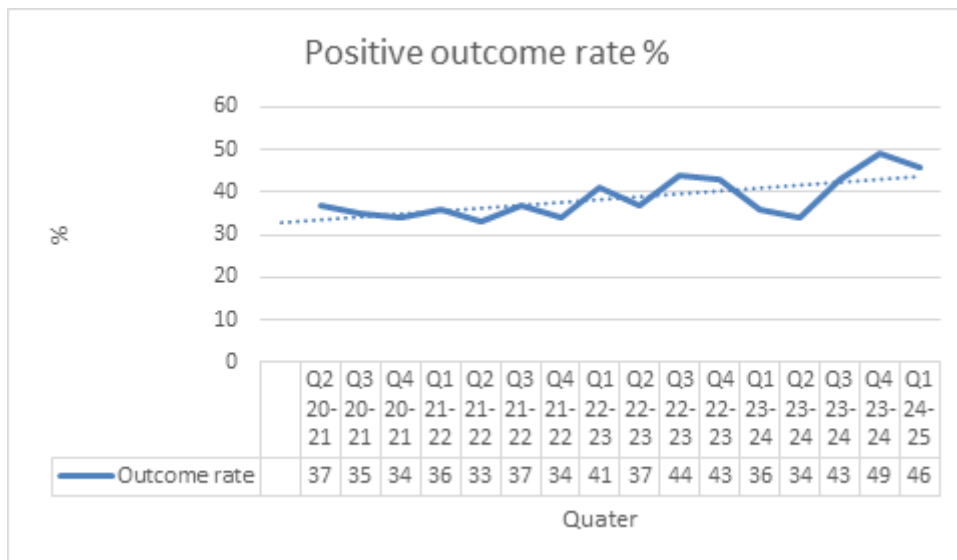
Outcome rates (including disproportionality)

8. For disproportionality, the Stop & Search and Use of Force data uses the White ethnicity group as the comparator. In fact, any ethnic group can be used as the comparator, but a larger comparator group makes the relative likelihoods more reliable. In practice, the availability of data is often a key consideration. To ensure robustness in the disproportionality figures the resident population of Greater London is used in our formula to calculate ethnic disproportionality figures. As an example, the resident population (8853) would make up just 1.8% of the number of people in the city on an average day, making an unrealistic outcome for City of London disproportionality figures.

9. A relative likelihood is a number that indicates the extent to which two groups differ in their likelihood of experiencing an outcome. In practice, if an ethnicity group had a disproportionality rate of 1, this would mean that this group is equally as likely to be stopped and searched as the white ethnicity group, a score of 2 would suggest you are twice as likely to be stopped and searched.
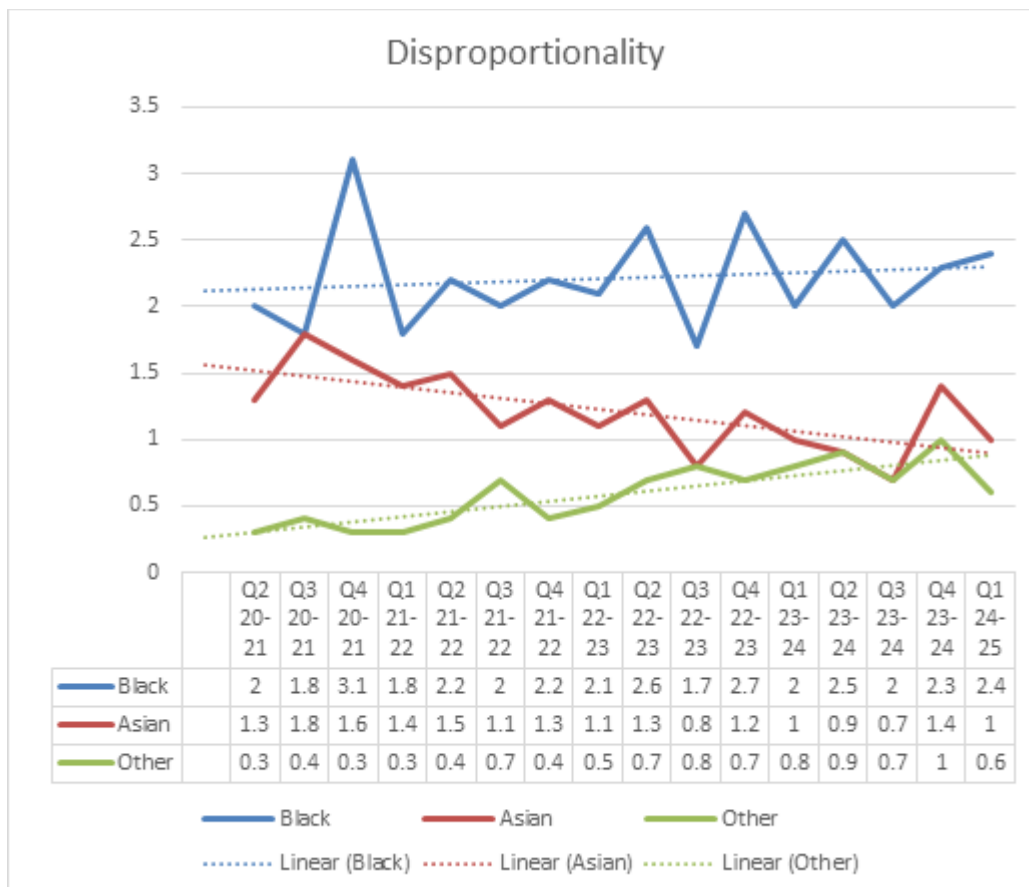
Stop and search

10. The positive outcome and disproportionality rate for the CoLP Stop and Search (S&S) is amongst the best in the country: Figure 1 charts the positive outcome rate (the proportion of searches that result in action taken by police) across time and presents an improving and impressive figure. Our CoLP Servator team has delivered a 76% positive outcome rate across 2024 and as can be seen in section 4 of this paper (External scrutiny and training) this is being harnessed through a new training initiative for frontline staff.

Positive outcomes – Fig 1

Positive outcome rate %

	Q2 20-21	Q3 20-21	Q4 20-21	Q1 21-22	Q2 21-22	Q3 21-22	Q4 21-22	Q1 22-23	Q2 22-23	Q3 22-23	Q4 22-23	Q1 23-24	Q2 23-24	Q3 23-24	Q4 23-24	Q1 24-25
Outcome rate	37	35	34	36	33	37	34	41	37	44	43	36	34	43	49	46

Quater

Disproportionality – Fig 2

11. Figure 2 presents the disproportionality figures for Stop and Search usage in City of London Police. Disproportionality here uses the same relative likelihood scores as for stop and search.

Disproportionality

	Q2 20-21	Q3 20-21	Q4 20-21	Q1 21-22	Q2 21-22	Q3 21-22	Q4 21-22	Q1 22-23	Q2 22-23	Q3 22-23	Q4 22-23	Q1 23-24	Q2 23-24	Q3 23-24	Q4 23-24	Q1 24-25
Black	2	1.8	3.1	1.8	2.2	2	2.2	2.1	2.6	1.7	2.7	2	2.5	2	2.3	2.4
Asian	1.3	1.8	1.6	1.4	1.5	1.1	1.3	1.1	1.3	0.8	1.2	1	0.9	0.7	1.4	1
Other	0.3	0.4	0.3	0.3	0.4	0.7	0.4	0.5	0.7	0.8	0.7	0.8	0.9	0.7	1	0.6

Black — Asian — Other

Linear (Black) ⋯⋯ Linear (Asian) ⋯⋯ Linear (Other)

<u>National Comparison (12 months)</u>

12. The City of London Police performs well in national comparisons for disproportionality and positive outcome rates as can be seen below in figure 3 and 4.

National comparison of disproportionality – Fig 3:

Self-defined ethnicity	Disproportionality (national average)	CoLP
Asian or Asian British	2.0	1.0
Black or Black British	6.5	2.3

National comparison of positive outcomes – Fig 4:

Force	Average Positive outcome rate
National	27% (2022-23)
CoLP	39% (2022 - 2023) 47% (2023 – 2024)

<u>Use of force</u>

13. Much like in S&S, our Use of Force (UofF) sees a reassuring disproportionality rate which is showing a downward trajectory over the past year (fig 5). Like in S&S, disproportionality is represented as relative likelihood with the white ethnicity group as the comparator.

Fig 5- Disproportionality rate in Use of Force (graph):

Disproportionality Over Time
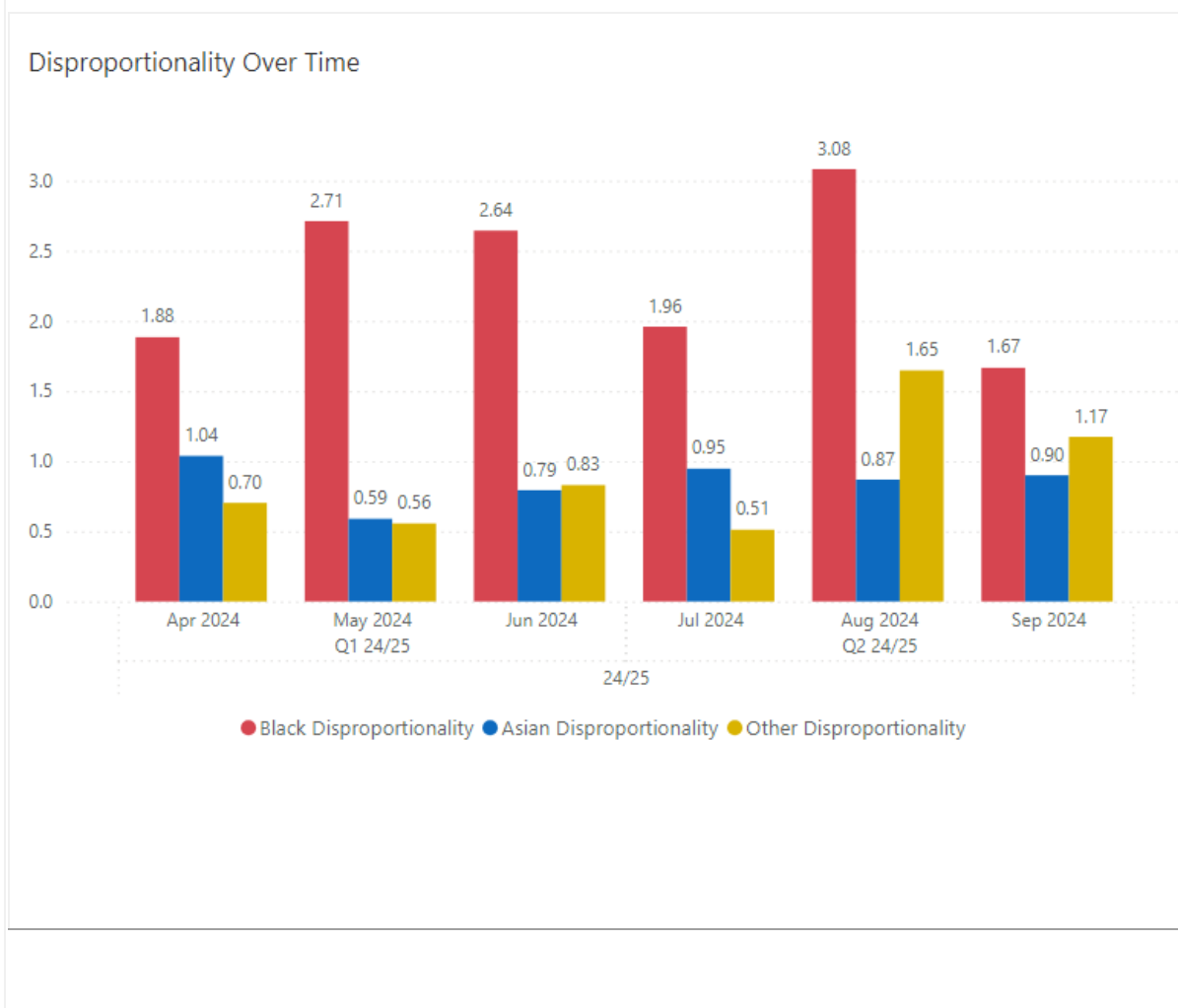
Internal Supervision and dip sampling

14. The City of London Police has a comprehensive approach to the supervision of stop and search reports. In the first instance the duty sergeant for the shift in which the stop and search is completed will undertake supervision. Following this, Chief Inspectors then dip-sample the grounds only. At this initial stage of supervision, supervisors will assess to ensure legal requirements are met and that the officer acted with appropriate professionalism and respect. The most recent compliance data for initial supervision within the first 24hrs is 89% (November 2024).

15. In addition to the supervision of Stop and Search and Use of Force there is a robust dip sampling regime. During the last PEEL inspection in which the City of London Police was graded 'Good', we saw dip sampling at an average of 10% of total searches reviewed per month. This included dip sampling by Chief Inspectors. Since July 2024 City of London Police has dip sampled at

least 15% of searches each month. In addition to the internal dip sampling, November and December saw the external scrutiny of 38 records and BWV by IASG members (see section 23-26). Since refreshing the governance structure in July 2024 there has been encouraging increases in positive outcomes, reduced numbers of stop and searches and an increase in external scrutiny.

16. In addition, AOJ (custody) dip sample the compliance and quality of Use of Force forms linked to custody cases through the Custody Management Group (CMG).

Complaints analysis

17. Whilst complaints associated with the use of police powers do not necessarily represent positive or negative practice, it can indicate concerning issues and provide useful learning.

18. The Professional Standards Department reviews all complaints, and data from the last 12 months suggests that only 3 complaints were linked Stop and Search encounters. This represents 0.12% of our searches for that year period. Professional Standards representatives attend the governance meetings for Stop and Search to feedback learning emerging from complaints.

Governance arrangements

19. Following a 'reality test' of our stop and search and Use of Force governance in July 2024 urgent work was undertaken to improve overall 'grip' in terms of our monitoring and understanding of how stop and search and force are being used across the force.

20. The agenda and terms of reference for both Strategic and Tactical groups was refreshed in August 2024 (appendix B and C) to deliver consistent review of key areas including data, performance, training, collaboration etc.

21. Attendance at both groups has been made mandatory for all key departments and the strategic group has temporarily increased in frequency to coordinate continued delivery of improvements.

External scrutiny and learning

City of London Corporation

22. At a strategic level, the S&S and UofF strategic lead attends the quarterly City Corporation Member-led Professional Standards Integrity Committee and

presents a report on behalf of the Commissioner. The committee members can question the strategic lead and Chief Officer representative on the data presented and request actions for future committees.

IASG

23. In 2023, the Independent Advisory and Scrutiny Group (IASG) saw a significant reduction in its members. This impacted the external scrutiny and valuable input that CoLP received. However, thanks to the drive of the IASG chair the membership has grown from around 4 members at the end of 2023 to 14 current members.

24. The IASG meets once a quarter and as part of its role it holds CoLP to account for its S&S and UofF. It has taken significant time to ensure that the vetting of IASG was appropriate to allow for scrutiny of Body Worn Video (BWV) linked to S&S and UofF.

25. The training of IASG members is underway and we now have 5 of the 14 members capable of reviewing BWV, as of 15/01/2025 38 records have been scrutinised by IASG members. This process sees IASG members attending the police station and being supported to view BWV and related records. The IASG member then completes a scored feedback report, any learning and good practice is shared with officers and line managers and is added to a 'lessons learnt' document which is managed through the working group. Work is being undertaken to create watermarked BWV clips to allow for IASG members to scrutinise records remotely.

26. In addition, members are able to undertake a ride-along with police and have so far viewed two stop searches in person with further 'ride-alongs' planned with IASG members with a specific Stop Search focus. The feedback from these is reviewed as an agenda item at governance meetings.

Youth IASG

27. The CoLP Youth IASG sits every 4 months with the next meeting due in early February. Discussions are underway to include scrutiny of S&S in this forum.

Collaboration with MPS

28. The tactical and strategic leads for S&S and UofF within CoLP attend both London region and national S&S groups where best practice is shared. Furthermore, S&S leads within CoLP have engaged with neighbouring MPS boroughs to better understand the demographics and challenges of their communities which often cross into City of London areas.

29. Work is ongoing with University of East London who are publishing a piece of research into CoLP S&S proportionality in January 2025. Additionally, students from the University have previously attended Bishopsgate Police Station in 2023 to view BWV and dip sample S&S forms, a further attendance is planned for 25th February 2025 and feedback will be disseminated through the governance channels.

Youth engagement

30. 90 young people from the London Borough of Newham have participated in youth engagement events in Bishopsgate Police Station, completing S&S role plays, viewing and feeding back on S&S videos and participating in Q&A sessions. Additionally, further inputs have been conducted with youths at Gravesend Public Order training facility to improve awareness of policing activity and engagement. Feedback received from those events was shared with officers and staff.

Training

31. Learning and Development representatives are routine attendees at the S&S/UofF governance meetings and a standing agenda item ensures suitable coverage of officer training requirements and the improvements informed by feedback and data analysis.

32. Currently, all staff attend mandatory training including vulnerability, EDI, Personal Safety Training which includes Stop & Search:
    a. Personal and Public Safety Training has S&S scenarios included in its curriculum and is a mandatory annual course for all officers.
    b. 'Bitesize' sessions (delivered face to face in officer briefings). These have focussed on numerous topics, with the latest covering the findings from Child Q.
    c. A comprehensive vulnerability input is mandatory for all officers annually.
    d. 'Mentivity' training, which sees young Black people share their experiences of police interaction, particularly around S&S, and seeks to build bridges and improve process. This is accessible to all officers and is mandatory for all new recruits.
    e. A pilot of "enhanced" quality encounters training is being across January delivered by our National Delivery Unit to two frontline teams. Aiming to improve the quality of encounters, search grounds formation and positive outcomes. Evaluation of this will be shared when available.
    f. Intranet resource including guidance and information about S&S and UofF in the City of London for officers has been created.

Strategic direction

33. The strategic lead for Stop and Search and Use of Force has outlined four objectives to promote improvement and coordinate continuous improvement and scrutiny:

Objective 1:

Ensure that stop and search and use of force is lawful and that all rights of the individual are respected. Where grounds fall short, the matter will be addressed immediately and robustly via the established governance structure.

Objective 2:

For the tactical and strategic groups to provide consistent, inquisitive, and positive oversight and coordination of S&S and UofF.

Objective 3:

Proportionality of stop and search - To review actual or perceived bias and ensure that processes and accountability are transparent. Sharing data and information promptly and openly.

Objective 4:

Learning and complaints – Encourage feedback and share good and bad practice to encourage learning and improvement and ensure that S&S and UoF is in line with the Force values and priorities.

Conclusion

34. In conclusion, the City of London Police demonstrates a robust commitment to maintaining fairness, transparency and accountability in the use of Stop and Search and Use of Force powers. With some of the best outcome and disproportionality rates in the country, strong internal and external scrutiny mechanisms, and ongoing improvements through governance and training, the Force continues to set a high standard nationally.

35. Strategic objectives for the next 12 months aim to build on this foundation, ensuring lawful and respectful use of powers, addressing disproportionality, and promoting continuous learning. By prioritising procedural justice and community engagement, the City of London Police strives to enhance trust, legitimacy and effectiveness in delivering safety and security for all who live, work and visit the City.

Report Author

T/Supt Jesse Wynne
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City of London Corporation Committee Report

Committee(s):	Dated:
Professional Standards and Integrity Committee	06/02/2025
Subject:	Non-Public report:
Stop & Search and Use of Force	For Information
This report: • provides statutory duties • provides business enabling functions	People are Safe and Feel Safe
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Commissioner Pete O'Doherty
Report author:	T/Supt Jesse Wynne

Summary

Q3 saw a number of proactive operations within the City of London Police (CoLP) including Christmas Campaign, proactive bag theft operations run by the Proactive and acquisitive crime team and Road traffic operations run by Roads policing unit. It also saw the Global Investment Summit being held in the city. We also continue to support Op Benbow[1] and deploy to Palestine Solidarity Campaign / Pro Israel protests within the City and across London.

Stop/searches have seen an overall decrease of 27.4% since the previous quarter (since Q2 2024). This drop could be due to a number of factors including: the amount of events and operational orders during the period of Q3 which abstracted a number of officers onto those orders, the fact that officers are being more effectively scrutinised (both improved internal governance processes as well as external factors) which may

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[1] Op Benbow- Cross Border mutual aid Operations with MPS

be impacting a more considered approach to stop and search, and that the footfall amounts over the Christmas period was lower than anticipated.

Of the 490 stop/searches in the Q3 period, 95 were dip sampled at a rate of 19.38% experiential learning and feedback is given to officers where appropriate. This is above the targeted range of 10-15% dip sampling. 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.

Although there has been a decrease in stop search, along with a decrease in items found, our positive outcome rate has increased to 52%. During the period of Q3 we have again seen a decrease in Black disproportionality from 2.9 to 2.3. There is no operational reason during this period. Asian disproportionality has also decreased from 1.0 to 0.9. (National rates 2023 - Black ethnicity – 4.85, meaning a person of Black ethnicity is nearly five times more likely to be stopped and searched than a white person, Asian ethnicity – 1.58 times more likely to stop searched).

The University of East London project has been authorised and will provide academic and meaningful analysis of CoLP actions, Initial reports will be expected within Q4 2025.
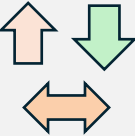
Complaints
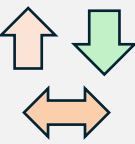
Total no Use of Force complaints - 9
Total number of Complaints Stops, and Stop and Search – 7 (4 of which relate to S&S. 3 resolved, one still under investigation)
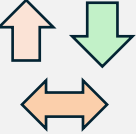
Stop and Search and Use of Force Data
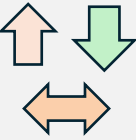
- **Key changes** – see comments below
- **Disproportionality** – see comments below
- **Outcomes –** See below

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend	Comment (if appropriate)
Stop search	490	- 185 27.4%	⬇	Decrease in stop/search
Arrest from stop search	173	- 46 21.8%	⬇	Decrease in arrests from stop search, in proportion to decrease in stop and searches, however positive outcomes have increased
Searches under s.60	0	- 19 100%	⬇	Decrease in Section 60 CJPO.

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend ⬆⬇ ➡	Comment (if appropriate)
Juveniles searched	41	- 10 19.6%	⬇	Decrease in youth search.
Black disproportionality	2.3	-0.6 20.68%	⬇	Decrease in Black disproportionality.
Asian disproportionality	0.9	-0.1 10%	⬇	Decrease in Asian disproportionality.
Total items found	253	- 43 14.52%	⬇	A 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 increased to 52% from 48%.
Strip searches[2] total	13	+4 44.44%	⬆	Increase in strip searches.
Strip search- More thorough	0	0	➡	

[2] See Appendix A for description of types of strip search

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend	Comment (if appropriate)
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	899	+52 6.01%	⇧	Increase in UOF. This may be due to increased scrutiny around completion of UOF forms
Juvenile use of force	63	+20 46.51%		Increase in juvenile UOF. This may be due to increased scrutiny around completion of UOF forms

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend ⬆⬇ ⬌	Comment (if appropriate)
Uses of force arrests	608	+82 15.58%	⬆ ⬆	Increase in force used during arrests. This may be due to increased scrutiny around completion of UOF forms
Uses of taser	17	+11 183.33%	⬆	Increase in Taser use (Drawn or Red dot challenge)
Taser discharges	0	-1 100%	⬇	Decrease in Taser discharge.
Live complaints relating to stop/ search			⬇	
Live complaints relating to use of force			⬇	

Key wider issues, risks, and mitigations

- As a force we continue to prepare for the upcoming HMICFRS Inspection that start will have started once this report is discussed.

- This comes with guidance and checklists to ensure all officers know their responsibilities and CoLP will look to integrate with our systems and to ensure we have scrutiny and correct governance**.**

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City of London Corporation Committee Report

Committee(s):	Dated:
Professional Standards and Integrity Committee – For information	6th February 2025
Strategic Planning & Performance Committee – For Information	11th February 2025
Police Authority Board – For Information	12th February 2025
Subject: Equity, Diversity, Inclusivity (EDI) Update	**Public report:** For Information
This proposal: • **delivers Corporate Plan 2024-29 outcomes**	People are safe and feel safe
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Commissioner of Police
Report author:	Det Supt Kate MacLeod

Summary

Following consultation with internal stakeholders and external partners, we are now able to present our EDI Strategy Implementation Framework which has recently been submitted in force through our internal governance boards. As have also produced an accompanying Plan which outlines our Year 1 priorities and delivery milestones from within the framework. Our focus within Inclusivity Culture and Organisational Development (ICOD) is now on finessing our performance packs and outcome measures to support this, ensuring we are prioritising competing tasks effectively.

Delivery of our Inclusivity Programme is ongoing, over 400 places were taken on modules between October and December 2024, a calendar of events for 2025 has been created, ensuring alignment to National days of EDI significance. Linked to this,

mapping of our Evaluation Strategy is now underway and has been made an ICOD priority for 2025.

A review of our Staff Networks and Associations has been completed and a series of recommendations ratified through our internal governance- this has included a decision to increase the number of hours that active members are expected to spend on network activities.

We are proud that the National Black Police Association (NBPA) has selected CoLP as the host force for this year's NBPA Conference, the first time it has come to central London since it was founded in 1998. We are aware of both the opportunities and challenges this presents, a Planning Committee has been established and 2 initial meetings have taken place to carefully monitor, review and drive this activity.

Other core deliverables for ICOD in 2025 are underway, notably herein we provide updates on our Code of Ethics lead (including the creation of an Ethics Committee) and Police Leadership Programme).

Recommendation(s)

Members are asked to:

- Note the report.

Main Report

i.   Local Update and Developments

EDI Governance, Implementation and Measurement within CoLP

1. Our EDI Strategy was published in July 2024, we were awarded our 'silver' rating by Inclusive Employers in September 2024. Since this time, the ICOD team have worked with internal stakeholders and key partners to produce our Implementation Plan and accompanying Framework and delivery milestones, this can be found at Appendices 1 and 2. The framework takes each of the 'Commitment' statements made within the four sections of the strategy (Our People, Our Policies, Our Public and Our Partners) and provides 'SMART' (specific, measurable, achievable, realistic and timely) actions against each one. Alongside this, we have also incorporated recommendations from our

Inclusive Employers Assessment as we work towards a 'Gold' rating over the next 5 years.

2. In addition to assigning ownership, we have also awarded a 'low', 'medium' or 'high' priority status to ensure that we maintain focus. In parallel, we have projected the status of each initiative over a 3 year period as either:-

Developing	Project / initiative is underway or in planning stages but not yet delivered
Achieving	Project / initiative has been delivered at base level but not evolved further
Advancing	Project / initiative has been delivered and has reached a sophisticated stage (for example, gone a step further by informing National innovative practice)

3. This methodology replicates that used by the College of Policing, with the aim of ensuring consistency of approach.

4. The framework has gone through a series of consultations, internal workshops have taken place both before and after the holiday season where we have achieved representation from members of our Black Police Association (BPA), Network of Women (NoW), Disability Enabling Network (DEN), Christian Police Association (CPA), LGBTQ+ and Police Staff Networks, along with members of our Trade Union and Police Federation. Externally we have consulted with colleagues at Inclusive Employers, Business Disability Forum (BDF), the College of Policing and via specialist EDI Peer review. Feedback has been positive, with colleagues particularly encouraged that the plan now goes beyond 'words and statements' and towards more tangible actions. Concerns were raised over the number of initiatives proposed, this has been negated by a stringent prioritisation grid / milestone assessment. Alongside this, ICOD are also presenting to our Chief Officers next month on our key priorities and deliverables for the year ahead, thereby incorporating this framework.

5. Our next steps are towards ensuring that we have clarity on our outcomes and the measurement of these. Our EDI Performance Pack / Dashboard continue to evolve and will capture these metrics as we develop our work in this area. At this time we have focused prioritisation around our Year 1 activities- we will need to dedicate more time towards the mapping for Years 2 and 3.

Inclusivity Programme Update

6. From October through to December, we delivered twelve 'face to face' events and two online modules with a total number of 410 attendees. This included

our established events (Active Bystander, Ethical Dilemmas and Mentivity - Black History / Stop Search). We have also begun our new module 'Understanding Ideologies', this will continue to be delivered through to March 2025 after which time we will review. We continue to conduct a basic evaluation for each session, feedback continues to be positive and we ensure we follow up with practical steps. For example our 'focus on - Managing colleagues with health conditions, neurodiversity and disability' was delivered in partnership with members of our Disability Enabling Network and HR, this forms part of a wider training piece that HR are leading on for Supervisors.

7. In November, aligned to White Ribbon Day, we delivered two sessions with specific focus on Violence Against Women and Girls. Detective Chief Supt Zara Brown from Bedfordshire Police provided an 'in person' talk on a high profile investigation she lead on relating to a serious sexual assault, providing insights on best forensic practice, community engagement and advice on interaction with our Criminal Prosecution Service (CPS), this provided valuable Continuing Professional Development (CPD) for our detectives in particular. Secondly, our 'Focus On - IOPC: Ending victim blaming language in the context of violence against women and girls' was relevant not just to officers in force but anyone involved in communication around victim/survivors of violence. Again, the practical value of this has already been recognised, for example, by Chief Insp Paul Doyle who has used the input to upskill his staff in our Force Control Room who may take initial calls and provide onward reporting or messaging.

Cultural Audit

8. As part of our proactive approach to mapping culture and behaviour within CoLP, Phase 2 of our cultural audit has now been completed with 87 officers participating in total, a report of key findings and next steps have recently been presented at our next Chief Officer Meeting. This outlined the methodology utilised, key findings and recommendations for next steps. In conjunction with feedback received following these initial discussions and next steps confirmed, this is being brought as a separate paper to our for PSIC review.

ii.   Key Issues, Risks and Mitigations

Evaluation Strategy

9. The need for a meaningful evaluation strategy for our new workstreams has been acknowledged since its inception, we also understand that in order to achieve this we need to think 'smart'. As such, Professionalism and Trust have decided to approach the task holistically, advancing an opportunity to streamline our approach across a number of areas whilst maintaining consistency. This means that ownership will not sit purely with ICOD but will stretch across other key teams and will include, but is not limited to, evaluation of:-

- Our Inclusivity Programme modules
- Our Police Officer and Staff Training Courses (both mandatory and optional)
- Our Police Leadership Programme
- Other EDI initiatives and interventions (for example, listening circles).

10. Currently our evaluation methods are basic - we send out surveys following events as listed above, but rarely do we follow up around behaviour change or embedded learning. This is vital if we are to understand the effectiveness of our inputs and whether we are achieving our force aspirations and priorities.

11. As it stands, we provide an extensive portfolio of courses across L&D and ICOD, every officer in CoLP will spend at least 5 days each year completing mandatory training as a minimum. Each package differs significantly including trainer style, curriculum content, learning method and structure. There is no comprehensive capture of this information, we rely on limited feedback and ad-hoc comment to assess the effectiveness of our inputs.

12. We have made the creation of an Evaluation Strategy as a priority for 2025, we appreciate that we are not experts in this field so are working with colleagues in academia to plan this. To date, we have identified the following as potential areas for scrutiny:-

Trainer Competence (to consider their skills, capability, knowledge)

Internal Course evaluation (to check relevance, accuracy, organisational needs, alignment with College of Policing)

External Course Evaluation (to include cost, 'CoLP' context and business needs)

Behavioural Change over time (what is being done differently as a result of the input received and cost/benefit analysis)

Community Evaluation (how to our public and communities feel as a result)

13. We are also in the process of mapping available methods of evaluation, these include classroom observations, in-course feedback questionnaires, post-course feedback, in-role observations, workbooks / follow up activities to demonstrate embedded behaviour change, professional discussions and

exams/knowledge checks. Once our mapping activities are completed later this month, we will be able to make a series of recommendations for future implementation. This will include clear Key Performance Indicators (KPIs) set out against data that can record impact.

Delivery of National Black Police Association (BPA) Conference October 2025

14. CoLP are excited to announce that we have been selected as the host force for this event later in the year. This presents an excellent opportunity for CoLP to showcase both local and National BPA membership, improve awareness of issues impacting black and other ethnic minority groups, as well as helping improve trust and confidence in Policing at all levels.

15. A Planning Committee has been created and the first meeting took place on 19th December, we were pleased to welcome attendees from both local and National BPAs as well as from Essex Police (who hosted the event last year) to ensure we are incorporating lessons on worked well and what could be improved for 2025. Our focus currently is on confirming a venue and dates so that we can publicise these to our partners, we will be expecting representatives from all forces and around 350 attendees in total. Following this, we can then focus our attention on content, themes and speakers.

16. In addition to the size and scale of the event, we also expect challenges around our history within the City and links to slavery, but we will continue to work with our black colleagues to plan how we treat with sensitivity whilst also 'owning' our past and showing our progress and future commitment. We will also need to be mindful of the National feeling in policing around recent events, including the shooting of Chris Kaba, which has created strong feeling- significantly with some of our specialist officers in London. Again, this is where open conversation with our BPA colleagues and early consideration of such issues will be key to successful delivery.

Staff Network Review

17. At our January EDI Strategic Board, a paper was presented which sought to equip our network members with access to the best practice and provide support for network activity in order to help drive positive culture change. This came about following a request from our networks for more clarity around procedures and processes supporting their management and delivery in CoLP, previously listed as a 'risk' at this Committee. ICOD conducted benchmarking activities with other forces to better understand the support that networks require and how we can enhance opportunities for effective working to improve our outcomes.

18. As a result of this review, a number of recommendations were recently approved, in summary:-

Incorporation of Networks: A force structure for our networks to be implemented in line with all protected characteristics (as per UK Equality Act 2010), each to complete its own Terms of Reference to provide a clear understanding of objectives/roles

Protected Time: An increase in protected time for Executive Committee members to a maximum of 32 hours per month and for Active members an increase to a maximum of 12 hours protected time per month. Line managers will be expected to positively consider supporting any additional abstraction, subject to operational and business requirements. A monitoring framework is being created so that both members and supervisors are able to record and assess the impact and value of network activities.

Training: To ensure that network members have the skills and knowledge required to deliver in accordance with the Equalities Act, further training courses (at CMI Level 4-6) to be arranged for 2025.

Finance: An annual budget submission from each network to apply for funding activities and accompanying log of all activities attended throughout the financial year, including learning imparted (to also assist with Personal Development Reviews).

Best Practice: Our networks to be consulted when new policies and procedures are developed or reviewed.

19. In implementing these recommendations, we are confident that our networks can evolve into robust, strategic assets that not only support individual well-being but contribute to the forces mission in becoming one of the most inclusive and trusted forces in the UK.

iii.   Forward Look

Inclusivity Programme

20. In relation to future Inclusivity Programme modules, we continue to respond to what people are telling us (whether that be via our staff survey, cultural audit or organisational learning) and ensuring the modules we deliver are relevant to identified themes and have practical value. We have modules planned for this quarter of 2025 as follows:-
- Lawrence Davies LLM presenting on black justice (following his presentation at the National Black Police Association Conference).
- LGBTQ+ parenting event in partnership with Pricewaterhouse Coopers
- Time to Talk / Mental Health awareness session
- Ethics Panel- Transitioning and gender fluid officers and staff
- ICOD team continue to deliver sessions on 'active bystander' and 'ethical dilemmas'
- Single parent support / awareness (in planning stages)
- Focus on Bipolar (in planning stages)

21. As we continue to professionalise our programme, we have also worked with our Staff Networks and Associations to create a forward-planning diary of

events, ensuring that our modules are promoted in advance and are aligned, as appropriate, to significant dates in our EDI calendar.

Code of Ethics Delivery

22. Under our new lead in this area, we continue to work closely with the College of Policing on this workstream, hosting a visit from Senior Leaders at the end of last year where they attended a Code of Ethics workshop. The workshop allowed them to meet with colleagues (including our new student officers) to gain an insight in to their understanding of the new Code and what it means in practice and also helping us to increase awareness within our own force.

23. In our ambition to bring the Code 'to life' in force and act as a testing ground for ethical dilemmas, ICOD are in the process of creating an internal 'Ethics Committee' to be responsible for enhancing trust and confidence in the governance and actions of the City London Police. We know from benchmarking with other forces that such initiatives have a positive impact on daily decision-making and have enabled policing colleagues to challenge in a constructive manner. Our cultural audits have shown that we need to further embed standards of behaviour, our Ethics Committee will support this aim by identifying organisational improvement opportunities to promote our core values of Professionalism, Integrity and Compassion.

24. Terms of Reference for our Ethics Committee have been drafted with objectives as follows:-

- Promoting high standards of ethical conduct in accordance with the Code of Ethics.
- Embedding ethics at the heart of organisational decision making
- Providing a focus for education and understanding around ethical issues.
- Scrutinising Force values and their application.
- Encouraging discussion within and outside of the organisation, promoting a culture of inclusion and ethical standards.

25. As we continue to develop our work on this piece, we are cognisant of the need to measure impact and promote organisational learning; as part of this we are linking in with an existing Regional Ethics Committee as well as including in our Evaluation Strategy.

Police Leadership Programme (PLP)

26. The PLP has been designed by the College of Policing to provide a comprehensive leadership development journey for the whole career of anyone working in policing. The Programme focuses on five levels of leadership from foundation/entry level to executive leaders and our work within CoLP to ensure effective delivery continues at pace.

27. The Force is part of an NPCC pilot, partnering with Durham University and four other forces, who have collaboratively designed a programme mapped to the College of Policing's curriculum for first and mid-line leaders. The Programme is mandated for all officers, police staff and volunteers in target ranks and grades, whether newly promoted or experienced within those staffing groups. It covers both leadership and management development and includes the following modules: inclusive leadership, personal leadership, operational and work-based leadership, organisational leadership, leading partnerships and coaching and mentoring.

28. The Programme will be delivered over five days, with two days being focused on COLP specific management practices and policy. Director/Service Leads within Corporate Services have been consulted and will provide inputs, including strategy and governance, Human Resources, Change, Information Management and Professional Standards.

29. Learning and Development are running a pilot at the end of February with full roll out from April 2025.

Conclusion

30. In conclusion, the City of London Police continues to advance its commitment to equity, diversity and inclusion through a strategic and systematic approach. The progress made in delivering the EDI Strategy Implementation Framework, including the prioritisation of initiatives and measurable outcomes, reflects a proactive and collaborative effort to embed inclusivity into the core of the organisation. With ongoing development of the Inclusivity Programme, preparation for the National Black Police Association Conference, and enhancements to staff networks and leadership initiatives, the force is not only addressing immediate priorities but also laying the foundation for sustainable change. These efforts, supported by robust evaluation strategies and ethical leadership frameworks, reinforce the Force's mission to be one of the most inclusive and trusted police services in the UK.

Appendices

- Appendix 1- EDI Strategy Implementation Plan and Framework
- Appendix 2 – EDI Delivery Milestones
- Appendix 3 – Inclusivity Programme Evaluation

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EDI Strategy Implementation Delivery Plan

Year 1: January 2025 – March 2026

1. Introduction

This paper aims to set out the Year 1 EDI priorities which the City of London Police are committing to as part of our new EDI Strategy, providing rationale for our selection, proposed timeframes for completion alongside metrics to demonstrate progress. It is important to note that, prior to publication, during and since, our delivery of initiatives in this area has not slowed pace. However, we have recognised the need to map out our priorities and measures to ensure a focused delivery.

2. Background

Following the launch and publication of our EDI Strategy in July 2024, the Inclusivity, Culture and Organisational Development (ICOD) team have consulted widely, both internally (with our Staff Networks and Associations) as well as with key external partners, to identify our next steps. This has allowed us to prioritise the areas which we know are most important to our stakeholders, but also incorporate feedback from Inclusive Employers following our recent submission and 'Silver' award. We have also given due consideration to our National policing requirements (as set out by both the College of Policing and the National Police Chief's Council), as well as acknowledging our legal obligations.

In doing so, we have been able to provide tangible actions against each of the published 'Commitment' statements from the four sections of the strategy (Our People, Our Policies, Our Public and Our Partners) which set out how we will go about achieving progress. Working collaboratively, we have been able to decide which actions are a priority for us and apply some realistic timeframes. In acknowledging that much of the co-ordination and drive behind many of these actions will come from the small team of ICOD, we have had to think carefully about what can be achieved and the commitment involved. To provide clarity on milestones, the following status matrix has been mapped against each action over a 3 year period as either:-

Developing	Project / initiative is underway or in planning stages but not yet delivered
Achieving	Project / initiative has been delivered at base level but not evolved further
Advancing	Project / initiative has been delivered and has reached a sophisticated stage (for example, gone a step further by informing National innovative practice)

This methodology replicates that used by the College of Policing, with the aim of ensuring consistency of approach. We have also ensured all of our proposals are aligned to our forthcoming Policing Plan priorities, with our core values of Professionalism, Integrity and Compassion suitably reflected. The governance of this implementation plan is also going to be crucial, our recent review of internal governance provides a platform for us to hold ourselves to account (through our EDI

Strategic and EDI Delivery Boards). We understand that we also need to apply scrutiny from outside formal governance and will do so through mechanisms such as our Independent Advisory Scrutiny Group (IASG); they have been consulted and provided feedback as we have worked towards this plan.

This paper will now provide an overview of our Year 1 workplan, for each part of the Strategy we have selected our Commitment Priorities and the Deliverables against each one. As one might expect, a significant majority of these relate to 'our people', acknowledging that so much focus in Policing currently is around standards of culture and behaviour. We have then selected the most appropriate measures from those which we have listed within our Strategy; again, we have made considered selection based on availability/quality of data alongside relevance. Going forwards, once we have established our baseline measures, we will be able to add in more meaningful goals or targets.

It is important to note that in addition to our EDI delivery, there are broader things that we are doing that are not referenced specifically within this plan- for example, hosting this year's NBPA Conference, reviewing and refreshing our VAWG Strategic Plan. Future iterations of this plan will endeavour to incorporate this additional activity- as a force, we appreciate that there will always be a degree of flex as and when new themes or priorities emerge.

3) Prioritisation and Delivery - Our People

3a) 'Our People' Year 1 Commitments

- Increase the diversity of underrepresented talent from all backgrounds (within student officers intakes and) at all levels of our service.

- We will complete audits every quarter and use the results of these to inform changes in culture, the content of our inclusivity programme and professional standards work

3b)

Our People
What we have delivered

Active bystander training (373 officers trained) *To continue into year 1*	Leading with Impact for female employees (22 attendees) *To continue into Year 1*	Positive Action Leadership Scheme (PALS) for black,asian and ethnic minority constables, sergeants, and police staff. (3 courses delivered, 24 atendees) *To continue into year 1,2,3*	Senior leaders pledges
DRIP passports (Delivering Racial equity In Practice) *To continue into year 1*	Personal Development Reviews with inclusivity objectives within *To continue into year 1,2,3*	Staff Survey *To continue into year 1,2,3*	Domestic Abuse Matters' training for all officers has already seen 800 officers successfully trained *To Continue into year 1*
	Cultural audit (4 completed) *To continue into year 1*	Listening Circles	Leadership training

3c) 'Our People' Year 1 Deliverables

This is by far our largest 'P' in terms of deliverables, but also our significant focus in Year 1. This is in part due to our statutory and legal obligations- we need to publish our Annual Public Sector Equality Duty by April of each year and in addition to our gender pay gap, best practice suggests that forces should also include analysis of pay gaps between other groups i.e. race.

We know that improving our diversity must be a priority and is the focus already of much of our work in this area. As HR finalise their workforce plan, they are linking in closely with ICOD and other internal stakeholders to ensure that our recruitment strategy is able to deliver in this area. This is also a priority for many of our additional workstreams within ICOD, including our Police Race Action Plan and recommendations following both the Casey Review and Angiolini Inquiry. Alongside this, it is vitally important that we improve our internal data capture, including the make-up of our current workforce. We need to ensure that our officers and staff not only have access to update their private information but also that they are regularly encouraged and motivated to do so. Hence, this has been allocated as a separate piece for one of our SMT leads as part of his Police Executive

Leadership Programme (PELP) supporting evidence, alongside our work within ICOD and Internal Communications.

A number of projects are already underway, including our Positive Action Leadership Scheme (PALs), Cultural Audit, Staff Survey, Leadership Training, Sponsorship and Inclusivity Programme. It is important that this delivery continues but we recognise that we must better understand the impact that these initiatives are having. As such, we are committed to investing more in this area, hence focusing on developing a more sophisticated evaluation strategy during Year 1. These will continue to be delivered by ICOD, but we understand that we will need to utilise the expertise of others, in particular our peers and partners who already have effective evaluation mechanisms in place.

3d) 'Our People' Why is this important?

We recognise the importance of these areas as they help us to build towards a gold accreditation with inclusive employers and fulfils our strategic aim of being one of the most inclusive forces in the Country. We understand the need to record and measure the impact that these initiatives are having, to support our people. Alongside this, we are fully aware of our statutory obligations. As such, we are committed to investing further in this area, hence focusing on developing a more sophisticated evaluation strategy during Year 1.

3e) 'Our People' Year 1 Measurement

- Recruitment, retention and promotion / development figures of all people, with special focus on those from minority backgrounds
- A decrease in the number of complaints received
- A decrease in the number of cases of discrimination, bullying or similar
- Year-on-year progress in percentages of our people declaring their differences
- Improved assessments results of our culture, both qualitatively and quantitatively

4) Prioritisation and Delivery- Our Policies

4a) 'Our Policies' Year 1 Commitment

- We will use our staff networks and associations as key partners in delivering inclusive and relevant policies and review these quarterly to ensure their effectiveness

4b)

Our Policies
What we have delivered

Independent Advisory and Scrutiny Group (IASG)
To continue into year 1,2,3

Youth Independent Advisory and Scrutiny Group
To continue into year 1,2,3

Partnership with Mentivity, (educate and provide insight into young black people's experiences of interacting with the police).
To continue into year 1

Staff Networks and Associations engagement
To continue into year 1,2,3

Community engagement including listening groups, holding internal and external events
To continue into year 1,2,3

4c) 'Our Policies' Year 1 Deliverables

We will review our Equal Opportunities Policy and *all* policies relating to bullying / harassment, including external examination to ensure that we are viewing appropriately through an 'EDI' lens. These activities will be led by ICOD, utilising our existing networks and scrutiny groups. We will also be seeking out National good practice in Policing to learn from those who are already advancing in this area.

We have recently completed a review of our Staff Networks and Associations, implementing recommendations relating to dedicated time for activities, governance, budgeting and training. Through continued delivery of our Network Chairs Meetings and ongoing support, ICOD will ensure that our people remain key consultants in any new policies or procedures

4d) 'Our Policies' Why is this important?

We have a legal obligation to ensure our policies are fit for purpose, this was highlighted by our feedback from Inclusive Employers. By including our networks and external scrutiny groups in this process, we have a broad and informed perspective to grow our organisation in the most inclusive way. This stakeholder engagement increases internal and external trust and confidence in our service.

4e) 'Our Policies' Year 1 Measurement

- Completed review of key policies as detailed above, numbers to be provided and qualitative changes to be tracked

- Gender and Ethnicity Pay Gap reporting to provide insights into progress made on equitable pay structures

- Our staff networks and associations invited to inform, contribute and shape policies that impact our people (as per monitoring form template- to include numbers of policies reviewed, time spent and overview of changes made)

5) Prioritisation and Delivery- 'Our Public'

5a) 'Our Public' Year 1 Commitment

- We will engage positively with young people throughout London so that our young people meet and take part

5b)

Our Public
What we have delivered

Victim satisfaction survey *To continue into Year 1,2,3*	**Public confidence survey** *To continue into Year 1,2,3*	**Scrutinise stop and search and use of force** *To continue into Year 1,2,3*	**Our Inclusivity Programme** *To continue into Year 1,2,3*
Custody ADHD screening *To continue into Year 1*	**Princes Trust partnership** *To continue into Year 1,2,3*	**British Sign Language video app delivery along with training 17 staff and officers.** *To continue into Year 1*	**Police cadets programme** *To continue into Year 1,2,3*
	Delivery of national plans, including, National Police Race Action Plan, VAWG action plan, Business Disability Forum plan. *To continue into Year 1,2,3*	**The Police Authority's Independent Custody Visitor Scheme** *To continue into Year 1,2,3*	

5c) 'Our Public' Year 1 Deliverables

ICOD has, as of January 2025, taken ownership of our Youth Independent Advisory Group (YIAG). There is much to do to ensure effective member engagement and involvement going forwards. As such, we expect a significant bulk of our Year 1 Public focus to be on developing this group and maximising its impact and effectiveness. Similarly, we will work with colleagues in Local Policing to ensure connectivity and shared best practice between the YIAG and our Police Cadets and more general youth engagement. This will ensure effective governance, reporting and evolution of existing activity.

Again, all three of these actions cut across many of other workstreams including our National Action Plans on Violence Against Women and Girls (VAWG) and Race.

Finally, a high priority for ICOD remains a review of all existing National Plans, including EDI-related reports and recommendations, to ensure appropriate governance, co-ordination, delivery and reporting.

5d) 'Our Public' Why is this important?

Public engagement and scrutiny are key to being a transparent and reflective service, one that is keen to learn and grow. We can only understand the reality of our service delivery by engaging with the pubic, listening and understanding. Establishing diverse and reputable relationships will help to build a fully accessible and embracive force. This is fundamental in our bid to become one of the most inclusive police services in the country.

5e) 'Our Public' Year 1 Measurement

- Survey results and reporting relating to Public Satisfaction- specifically metrics contained as per our Public Confidence Survey ('confidence in CoLP doing a good job' AND 'how safe do you feel')
- The number of consultations taken place with our communities

6) Prioritisation and Delivery- 'Our Partners'

6a) 'Our Partners' Year 1 Commitment

- We will ensure we can measure the impact of our partnership work, review its progress, and build on outcomes

6b)

Our Partners
What we have delivered

Mentivity *To be continued in Year 1*	**Inclusive Employers** *To be continued in Year 1,2,3*	**Operation Reframe, includes licensed premises, The Corporation, Safer Business Network, The Samaritans and the SIA (security staff)** *To be continued in Year 1,2,3*	**Ethical Dilemma Training** *To be continued in Year 1,2,3*
Walk and Talk and Ride Along Scheme *To be continued in Year 1,2,3*	**The 'Be Lads' safety campaign** *To be continued in Year 1*	**'Focus On' sessions – external speakers from a range of diverse cultures, understanding lived experiences** *To be continued in Year 1,2,3*	**Network of Women have introduced young women to careers within the service** *To be continued in Year 1*

6c) 'Our Partners' Year 1 Deliverables

In our first year, it is proposed that we focus on achieving a clear understanding of our existing partnerships across the force. Alongside this, we also need to get a better understanding of our existing procurement frameworks- both what exists locally and Nationally (including any National Policing guidance / best or innovative practice).

ICOD are also committed to our ongoing Code of Ethics Delivery, including our Ethical Dilemmas training and the establishment of an Ethics Committee. Although this action stretches across all 4 pillars of work, there is a clear link with ethical partnerships, hence incorporation at this point.

6d) 'Our Partners' Why this is important?

Albeit the new Code of Ethics in Policing is non-statutory, it is the expectation of the College of Policing and the National Police Chief's Council that all forces will ensure their staff have a grounded understanding of its principles and will use these collectively across the business to support decision making and guide behaviour.

The new Code of Ethics highlights a commitment to work in the public interest, listening to the needs of the public we serve and standing up against any behaviour or attitudes that could bring the profession into disrepute and damage trust in the service. To be a trusted and valued service, we must act lawfully; understand and respond to community needs; ensure that our partnerships are ethical; reflect on and apply knowledge and experience; and improve ourselves, our peers and our profession. These behaviours align with our force values of Professionalism, Integrity, and Compassion.

6c) 'Our Partners' Year 1 Measurement

- Number and quality of partnerships formed across all areas of our service delivery,
- Number of attendees on ethics related training (to include Ethical Dilemmas) and Number of Ethics Committees held.

EDI Strategy Implementation Framework

2024-2027

1) OUR PEOPLE

No	Commitment Summary	Action required / Deliverable	Co-ordinator	Priority	Status	Year 1	Year 2	Year 3
1.1	Introduction of pledges from senior leaders that they are accountable for delivering	Pledges to be written and announced by all of CoLP Senior Leadership Team	ICOD	High	Completed	Achieving	Achieving	Achieving
		Review of pledges to take place by ICOD	ICOD	Medium	In progress		Achieving	Achieving
		To be an ongoing agenda item at EDI Strategic Board, progress to be monitored	ICOD	Medium	Not started		Achieving	Achieving
		The role of 'Champions' for Staff Networks to be formalised with clear roles and objectives. This will make it easier to define accountability lines and monitor / evaluate impact	ICOD	Low	Not started		Developing	Achieving
1.2a & 1.2b	Increase the diversity of underrepresented talent from all backgrounds within student officers intakes and at all levels of our service.	Creation of recruitment strategy which reflects the commitments made at 1.2a and 1.2b	HR	High	In progress	Developing	Developing	Achieving
		Review of previous talent strategy and creation of new plan (see also action at 2.4)	ICOD	Medium	Not started		Developing	Achieving
		Delivery and Evaluation of Positive Action Learning Scheme	ICOD	High	In progress	Developing	Achieving	Achieving
		Delivery of Sponsorship Scheme for those from minority backgrounds	ICOD	High	In progress	Developing	Achieving	Achieving
		Ensuring that existing programmes to support future leadership are available to all diverse groups within CoLP	ICOD	Low	Not started		Developing	Achieving

			Owner	Priority	Status			
		Evaluation of existing programmes to measure impact and 'success' rates for our diverse groups	ICOD	Medium	Not started		Developing	Achieving
		Retention and Exiting Workgroup created with programme of work in place	DCS NLF (Ops)	High	In progress	Developing	Achieving	Achieving
		Delivery against statutory requirements (including Public Sector Equality Duty)	ICOD	High	In progress	Achieving	Achieving	Advancing
		Ensure that staff can update their diversity data at any point through the self-service system and that this is collected at key stages in the employee lifecycle- onboarding, promotion etc. Aim to increase disclosure rate to 75% (recommend options are presented alphabetically to avoid implied hierarchy)	DCS NLF / HR / ICOD	High	In progress	Developing	Achieving	Achieving
		Ongoing monitoring of recruitment, promotion and retention data via EDI Strategic Board	ICOD / HR	High	In progress	Developing	Developing	Achieving
		Inclusion of 'attraction' data	HR	Low	Not started		Developing	Achieving
		Plan created to address poor disclosure rates relating to protected characteristics	DCS NLF (NFIB/AF)	Medium	In progress	Developing	Achieving	Achieving
		Consider using both qualitative and quantitative data to understand career aspirations across different demographic groups, addressing barriers and creating more career-enhancing opportunities for underrepresented groups	All-tbd	Low	Not started		Developing	Achieving
1.3	Consistent delivery of regular mandatory education on a variety of subjects pertinent to the cultures and lived experiences of our	Creation of Inclusivity Programme as mandatory for all CoLP Officers and Staff	ICOD	High	Completed	Achieving	Achieving	Advancing
		Creation of calendar, in consultation with networks, to inform activity	ICOD	High	In progress	Achieving	Achieving	Advancing
		Ongoing delivery of content and consistent evaluation	ICOD	High	In progress	Developing	Achieving	Achieving

ID	Objective	Action	Owner	Priority	Status			
	people, partners and public	Sophisticated evaluation plan in place to ensure 'impact' is measured	ICOD	High	In progress	Developing	Achieving	Achieving
		Explore strategies to increase officer participation in the Inclusivity Programme which will help achieve broader impact and foster greater cultural change	ICOD	Medium	Not started		Developing	Achieving
		Explore ways to implement evaluation methods that effectively capture the impact of events organised by staff networks	ICOD	Low	Not started		Developing	Achieving
1.4	Ensuring that all leaders working for us complete mandatory and regular inclusive leadership training. This will be regularly reviewed through relevant metrics, including our staff survey	Content and Timetable for leadership training to be agreed	ICOD / L&D	High	In progress	Developing	Achieving	Advancing
		Ongoing delivery of staff survey (including pulse surveys) and actions / communications from these	ICOD / L&D	High	In progress	Achieving	Achieving	Achieving
		Ongoing evaluation and monitoring of effectiveness, to link in with SLT pledges	ICOD / L&D	Medium	Not started	Developing	Achieving	Advancing
		Review of staff survey to be undertaken to capture effectiveness	ICOD / L&D	Low	Not started		Developing	Achieving
		Ensuring our SLT are attending Inclusivity Programme modules, compliance to be monitored through PDR	ICOD / L&D	Low	Not started			Developing
1.5	We will introduce inclusivity objectives into professional development reviews to drive individual accountability	Communication to be sent across the organisation that inclusivity objectives are now mandatory as part of PDR and promotion processes	Internal Comms	High	Completed	Achieving	Achieving	Achieving
		Compliance to be monitored / reported and individuals held accountable (through PDRs, performance reviews, appraisals and reward systems)	ICOD / HR	Medium	Not started		Developing	Achieving
		Consideration to be given as to how to reward / recognise efforts made by active SNA members and Executive Officers	ICOD	Medium	Not started		Developing	Achieving

	Objective	Action	Lead	Priority	Status			
1.6	Leverage the value of our PSD to monitor complaints and feedback we receive on our service and use our new investment in technology to record and address these in a timely manner and with empathy	A paper to be produced, outlining existing processes, highlighting gaps in delivery and making recommendations for future action / investment	PSD	Low	Not started		Developing	Achieving
1.7	We will complete audits every quarter and use the results of these to inform changes in culture, the content of our inclusivity programme and professional standards work	A cultural audit process to be designed and agreed; pilot to then be undertaken	ICOD	High	Completed	Achieving	Achieving	Advancing
		Reporting on the cultural audit to be shared internally and externally to agree on a) effectiveness of pilot, and b) next steps	ICOD	High	In progress	Achieving	Achieving	Advancing
		Review of reporting on culture to take place- do we have sufficient mechanism for 'low level' reports ie when people don't want to make formal complaints	PSD	Medium	Not started		Developing	Achieving
		Process to be put in place for quarterly audits / sense checking in relation to culture, including a mechanism to inform IP modules and organisational learning.	ICOD	Medium	In progress	Developing	Achieving	Achieving
1.8	We will embed recommendations from all national policing plans and working together with PSD, victim satisfaction and use of force monitoring teams, ensure expected high standards are met	Benchmarking exercise to be undertaken to ensure we have captured all relevant national policing plans	ICOD / Strategy & Planning	Low	Not started		Developing	Achieving
		Review of relevant national policing plans to extract relevant recommendations and ensure embedded within our own EDI frameworks	ICOD / Strategy & Planning	Low	Not started		Developing	Achieving

2) OUR POLICIES

No	Commitment Summary	Action required / Deliverable	Co-ordinator	Priority	Status	Year 1	Year 2	Year 3
2.1	We will establish partnership standards to ensure we can receive and review feedback from the public and our partners and share this with internal stakeholders to create new ways of working	Benchmarking / external consultancy around 'partnership standards'	ICOD / Strategy and Planning	Low	Not started			Developing
		Decide on ownership of / process for any public feedback mechanism	ICOD	Low	Not started			Developing
		Communicate internally with requisite governance in place for monitoring (i.e. via OLF)	ICOD	Low	Not started			Developing
2.2	We will monitor the effectiveness and impact of our IASG and YIAG, through our internal and public reporting metrics	Add this topic to the agenda of both IASG and YIAG for consultancy	ICOD	Low	Not started		Developing	Achieving
		Creation of plan to monitor influence and impact, including how this will be reported both internally and externally	ICOD	Low	Not started			Developing
2.3	We will use our staff networks and associations as key partners in delivering inclusive and relevant policies and review these quarterly to ensure their effectiveness	Completion of review of Staff Networks and Associations, taking forward recommendations to board for decision	ICOD	High	In progress	Achieving	Achieving	Advancing
		Identify all relevant policies and their owners, putting plan in place to review through EDI lens (to include external scrutiny / National best practice)	ICOD / Strategy and Planning	Medium	Not started		Developing	Achieving
		Undertake review and ensure effective monitoring via EDI Strategic Board	ICOD	Medium	Not started		Developing	Achieving
		Use of data on career progression, linked to pay gap analyses, and conduct an EIA on rank pay criteria / policy to identify any potential disadvantages for certain groups and develop positive actions to address these.	ICOD/HR	Low	Not started		Developing	Achieving

2.4		Review of all policies relating to bullying, harassment and grievances (as identified per IE 'quick win' feedback), ensuring ALL staff have adequate training	ICOD/HR/PSD	Low	Not started	Developing	Achieving	Achieving
		Review of Equal Opportunities Policy to include what happens if breaches occur, the available support and accountability measures in place (as per IE feedback)	ICOD/HR/PSD	High	No started	Achieving	Achieving	Advancing
	We will track the progression of talent through robust and impartial development platforms and processes	Creation of talent strategy which will include detail required at 2.4 (see also action at 1.2a)	ICOD	Low	Not started		Developing	Achieving
		Review the content of the Upcoming Police Leadership Programme / consider creating tailored input or separate inclusive leadership / talent management training programme to complement it	ICOD	Low	Not started		Developing	Achieving

3) OUR PUBLIC

No.	Commitment Summary	Action required / Deliverable	Co-ordinator	Priority	Status	Year 1	Year 2	Year 3
	We will engage positively with young people throughout London (whilst also offering our unique skills and training to all police cadets across the UK), so that our young people meet and take part in peer-to-peer teaching and learning	Youth IASG to be led by ICOD as part of new workstream, handover to take place and programme of activity planned	ICOD / LP	High	In Progress	Developing	Achieving	Achieving
		Programme of engagement with young people to be led by LP	LP	Medium	In Progress	Developing	Achieving	Advancing
		Programme of police cadet activity to be promoted and monitored	LP	Medium	In progress	Developing	Achieving	Advancing
3.1		Evaluation and impact measurement	ICOD / LP	Low	Not started		Developing	Achieving
	We will implement regular victim satisfaction surveys to assess and measure the effectiveness and professionalism of our services	Review of existing victim satisfaction survey / metrics, including content and timeliness	Strategy & Planning	Medium	Not started		Developing	Achieving
		Adapt / external review to ensure EDI angle fully captured within our surveys	Strategy & Planning	Low	Not started		Developing	Achieving
3.2		Report findings both internally (into EDI Strategic Board) and externally via Corporation	Strategy & Planning	Low	Not started		Developing	Achieving
	We will ensure the National plans that promote trust and confidence are embedded in our policing activities and provide metrics to measure their success	A review to take place of all National plans, including mapping of demand for delivery	ICOD / PSD	High	In progress	Achieving	Achieving	Advancing
		Clear ownership and reporting mechanisms agreed for above (including Casey and Angiolini)	ICOD / PSD	High	In progress	Achieving	Achieving	Advancing
		Ongoing monitoring via internal governance and external assessment	ICOD	Medium	Not started	Developing	Achieving	Advancing
3.3		Ensuring embedded throughout activity as part of IE standard	ICOD	Low	Not started	Developing	Achieving	Achieving
3.4		Review of existing engagement methods both internally and externally	Internal Comms	Low	Not started	Developing	Achieving	Achieving

	Objective	Action	Owner	Priority				
	We will engage in an accessible way with all of our communities	Recommendations to follow	Internal Comms	Low	Not started	Developing	Achieving	Achieving
		Independent scrutiny of engagement plan to take place via IASG and EDI specialists	Internal Comms	Low	Not started	Developing	Developing	Achieving
3.5	We will ensure our complaints processes are robust and offer a prompt way for us to efficiently respond to the views and needs of our people, public and partners.	Review of existing complaints process to take place and recommendations to follow	PSD	Low	Not started		Developing	Achieving

4) OUR PARTNERS

No.	Commitment Summary	Action required / Deliverable	Co-ordinator	Priority	Status	Year 1	Year 2	Year 3
4.1	We will ensure we can measure the impact of our partnership work, review its progress, and build on outcomes	Review of existing partnerships to take place to establish 'as is' position (alongside basic review of procurement framework / ethical processes)	ICOD	High	Not started	Developing	Achieving	Achieving
		Review existing procurement framework to identify opportunities to improve/enhance transparent and ethical partnerships	ICOD	Medium	Not started	Developing	Developing	Achieving
4.2	We will work in partnership with the Corporation Procurement Department to proactively identify and introduce partners from a diverse range of backgrounds in our supply chain	Detailed review of existing framework- both with Corporation and through identification of National best practice	Strategy & Planning	Medium	Not started		Developing	Achieving
		Work with stakeholders to identify best practice and build into plan to improve framework	Strategy & Planning	Low	Not started			Developing
4.3	We will facilitate opportunities to proactively bring diverse suppliers	Establish supplier baseline / current picture via review	CSD	Low	Not started		Developing	Achieving
		Create plan to maximise opportunities for future ethical / diverse partnerships with our suppliers	CSD	Low	Not started			Developing
4.4	We will build on these efforts and create additional plans in the areas where we still	Links to wider delivery of Code of Ethics- both internally and promoting efforts v ethics committee.	ICOD	High	In progress	Developing	Achieving	Advancing

| | | require growth and improvement. | | | | | | |

EDI Year 1 Priorities and Delivery Timescales

CITY OF LONDON POLICE

OUR PEOPLE

ACTIVITY	Priority (H/M/L)	Q2 2024	Q3 2024	Q4 2024	Q1 2025	Q2 2025	Q3 2025	Q4 2025	Q1 2026	Q2 2026	Q3 2026	Q4 2026	Q1 2027
Our People Commitment: Increase the diversity of underrepresented talent from all backgrounds (within student officers intakes and) at all levels of our service													
Recruitment Strategy which reflects this commitment (Strategic Workforce Plan)	H	Review & Refresh of		Ratification	Delivery of Strategic Workforce Plan and accompanying strategies inc. Attraction Strategy								
Review of previous Talent Strategy and creation of new plan	M					Review current strategy	Refresh Strategy and develop delivery plan	Pilot new Strategy		Evaluation	Delivery of refreshed Talent Strategy		
Delivery and Evaluation of Positive Action Leadership Scheme Programme (Cohort 4)	H				Delivery of PALS Programme			Evaluation					
Delivery of Sponsorship Scheme for those from minority backgrounds	H		Sponsorhip Scheme Pilot		Review of Pilot	Delivery of Sponsorship Scheme							
Ensure leadership programmes are available to all diverse groups in CoLP	L	Design & consult on PLP curriculumn		PLP Pilot	Delivery of Police Leadership Programme								
Evaluation of existing programmes to measure impact and success for diverse groups	M					Evaluation	Report findings	Oversee & co-ordinate delivery of recommendations					
Retention and Exiting Working Group established with programme of work in place	H	Establishment of Retention & Exiting Working Group and programme of work											
Ongoing monitoring of recruitment, promotion and retention data via EDI Strategic Board	H	Design dashboards	Pilot data dashboards	Revie	Robust monitoring of workforce data presented at EDI Strategic Board for scrutiny								
Inclusion of 'attraction' data	L								Review existing	Pilot new approach to capturing inclusion	Review pilot		
Plan to address low disclosure rates relating to protected characteristics	M				Review existing data	Develop pilot	Pilot new approach to improving	Review pilot					
Our People Commitment: We will complete audits every quarter and use the results of these to inform changes in culture, the content of our inclusivity programme and professional standards work													
A cultural audit to be designed and piloted	H	Design & pilot Cultural Audit											
Reporting and sharing the results of the cultural audit pilot internally and externally to agree a) effectiveness of pilot and b) next steps	H		Review &										
Process established for quarterly cultural audits to be conducted and the results to inform organisational learning	M				Delivery of quarterly Cultural Audits								
Our Policies Commitment: We will use our staff networks and associations as key partners in delivering inclusive and relevant policies and review these quarterly to ensure their effectiveness													

ACTIVITY	Priority (H/M/L)	Q2 2024	Q3 2024	Q4 2024	Q1 2025	Q2 2025	Q3 2025	Q4 2025	Q1 2026	Q2 2026	Q3 2026	Q4 2026	Q1 2027
OUR POLICIES													
Completion of review of Staff Networks and Associations, taking forward recommendations to EDI Strategic Board for decision	H	Complete review and identify AFIs	EDI	Pilot SSNA recommendations	Review	EDI → Fully implement SSNA recommendations							
Identify relevant policies (to include all policies relating to bullying, harrasment and grievances) and capture best practice and external scrutiny	H					Establish a	Review relevant policies identified as high priority			Review relevant policies identified as medium priority			Review relevant
Undertake a review and ensure effective monitoring	M								Review & evaluate			Review &	
Our Public Commitment: We will engage positively with young people throughout London (whilst also offering our unique skills and training to all police cadets across the UK) , so that our young people meet and take part in peer-to-peer teaching and learning													
OUR PUBLIC													
Youth IASG to be led by ICOD as part of a new workstream, handover to take place and programme of activity planned	H		Handov	Review existing programme and	Recruit new	Relaunch YIAG							
Programme of engagement with young people	M						Map current engagement			Develop framework for CoLP			
Programme of police cadet activity to be promoted and monitored	M							Review existing			Work in collaboration		
Evaluation and impact measurement	L												Review & evaluate
Our Partners Commitment: We will ensure we can measure the impact of our partnership work, review its progress, and build on outcomes													
OUR PARTNERS													
Review of existing partnerships across CoLP	H				Initiate review	Report findings & recommendations	Codify agreed recommendations into relevant						
Review existing procurement framework to identify opportunities to improve/enhance transparent and ethical partnerships	M								Initiate review in partnership with	Report findings & recommendations	Codify agreed recommendations into relevant		

Our People - Inclusivity Programme modules – Oct – Dec 2024

CITY OF LONDON POLICE

Understanding Ideologies linked to Extremism

PC Zunaid Patel, in International Training and Development, created training on this ttopic for Project Servator trainers. The training has already received positive feedback from colleagues across UK policing , we are now offering it to our staff whilst it's being accredited by the College of Policing.

During the session you are given a historical timeline of religious and political ideology. These points in history have shaped the world we see today; however, the context is not explored in the mainstream narrative, often creating echo chambers, which can lead to extremist thoughts and terrorist attacks across the world.

On Line Focus on Sessions

IOPC Sessopm

his session explored how the Independent Office of Police Conduct's (IOPC) guidance on ending victim blaming was created to encourage police officers and staff to think critically about their own and others' victim-blaming language attitudes and behaviours and how to challenge them. It shared what best practice was when engaging with victim-survivors

Managing colleagues with health conditions

. 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.

Active Bystander Training

This training will give delegates the tools and confidence to callout and challenge unacceptable behaviour

The term 'bystander'; active bystandership, as it relates to policing; what motivates bystander action; the inhibitors to bystander action; techniques on 'how to intervene'; bystander tools to help prevent misconduct, reduce mistakes and support colleagues' wellness and health.

Ethical Dilemmas

The training provides delegates with an opportunity to assess scenarios and situations from a management perspective through an EDI lens. It provides a framework for delegates to understand the impact that behaviour can have on others, their personal and professional responsibilities to tackle inappropriate behaviour and identify how biases (conscious or unconscious) can impact on inclusive decision making. Delegates are also given the opportunity to explore legal frameworks and policies in order to ensure their actions and decisions are reasonable, fair and legal.

Night Prowler

This year's theme,for White Ribbon day was 'It Starts with Men', In this session, Det Ch Supt Zara Brown, of Bedfordshire Police, discussed how offending behaviours can escalate from voyeurism to sexual assault. Using a case study of 'The Night Prowler', which featured on the television show '24 Hours in Police Custody', she explained Bedfordshire's response to tackling violence against women and girls.

Mentivity

Officers and staff are invited to gain an insight into young Black people's experience of interacting with the police, particularly around stop and search,

The session is run by Sayce Holmes-Lewis, who co founded the charity Mentivity. He works with police forces to increase understanding around the experiences of young Black people in the UK .

Our People - Inclusivity Programme modules

Understanding Ideologies linked to Extremism	On Line Focus on Sessions	Active Bystander Training	Ethical Dilemmas	Night Prowler	Mentivity

In person event

Lecture

3 Force wide events

30 attendees

Due to sensitivity of content, PC Patel advised no more than 10 per session

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Managing colleagues with health conditions, neurodiversity and disability

127 attendees

IOPC_ Ending victim blaming language in the context of violence against women and girl

107 attendees

In person Event

Training

3 Force Wide events

39 attendees

In person event

Training

3 Force Wide events

30 attendees

In person event

Lecture

One event

58 attendees

In person event

Training

2 Force wide events

25 attendees

Zunaid's input was one of the most informative I have heard on this subject His combination of Islamic history, political context and explanation of Islamist extremism taught us many things and filled many much needed gaps in our knowledge.

Thank you very much for your time and the extremely interesting presentation on extremist ideology.. The context and importance of the history and how it has been distorted is not only interesting but useful for establishing mindset of those we stop during resolution conversations

These sessions will continue from April 2025 when PC Patel returns from his training commitments

What did you find most useful?

- The distinction between the passive and active voice and how it can shift the focus of the action between a victim and perpetrator.
- The examples of passive and active voices. It showed the subtle biases of the person writing the report
- Understanding importance of using correct language when dealing with victims of serious offences - how subtle changes can impact
- The concept of being more mindful when using language in statements/reports. Making sure the language used does not create subtle unintentional bias.
- How important the victims should be treated when they are reporting such an awful crime.
- Understanding the nuances that can shift blame away from offenders
- When they broke down the different ways of saying the same sentence, and how it can be perceived differently by other people
- I found the reference to the language we use when writing reports/casefiles about VAWG most useful as I will take it onboard in future.
- Thinking about using words more carefully is a good idea - ensuring that the way something is phrased does not inadvertently infer that the victim is in some way responsible for getting assaulted (for example)
- I thought it might be police investigation focused but actually quite useful for report writing and strategy development in my job. Particularly thinking about language you use for particular crimes, e.g. burglary vs rapes
- The emphasis on the use of language was thought provoking. It's a change in mindset from how investigators are taught to write a chronology of what took place and what actions each person took. By changing the way the narrative is written it could change how someone feels when reading it back.
- The importance of ending victim blaming as victim blaming language shifts blame away from the abuser and onto the victim.
- I found it useful to understand how our attitudes, and behaviours can impact victims and have examples was really helpful.
- I found the addressing of the subtleties around language very useful to see how small changes to nuance can make the difference

This session was recorded and will form part of the Contact Staff training programme

CITY OF LONDON POLICE

What did you find most useful?

I enjoyed hearing both the manager and staff speak side by side in each of the examples, not only was it truly authentic and frank but
it also helped me see the whole picture and re focus how I would potentially address this issue
The personal stories and positive outcomes
The real life examples (although I appreciate the courage it must have taken to speak publicly)
Clarification on the passport, it was good to hear from the supervisor point of view,
HRs myth busting regarding managing reasonable adjustments and the live examples
The positive personal experiences from officers/staff really help to reinforce how effective communication
helps overcome perceived obstacles in the workplace.
The session was structured very well and easy to understand
Realising the (high) number of people who are aware of the issue
As a person who struggles with long term health conditions and chronic pain, I particularly enjoyed Steph's intervention
 as it resonated with me quite a lot, as well as Alison's intervention regarding myths.
Both these parts have made me realise that I have not asked help and adjustments for the reasons they mentioned, which are "silly" because in the end it's my right to ask and I'm not damaging anyone by doing so.
Hearing about real examples first hand (the two "case studies") because it was positive about what can be achieved (and brave of those taking part)

This session will be followed up by he work HR are doing on reasonable adjustments

Active Bystander

What did you learn?

- How to listen and potentially to challenge behaviour
- The importance of doing the right thing and calling out bad behaviour
- It was a useful reminder and interesting to hear different views and experiences
- Peer intervention doesn't have to happen then and there. It's okay to reflect and then deal with it slower time in a way that might be more appropriate.
- I learnt how to see the early signs of bad behaviour and will allow me to challenge obscure behaviour from colleagues.
- techniques of challenging inappropriate behavious
- Useful tips to engage with people in relation to poor behaviour
- I learnt not to be shy or hold back if someone acts inappropriately, but to do this in a friendly way where possible
- Different techniques on what to do to call out worrying behaviour.
- It reinforces professional practice within the workplace and sets a standard of acceptable behaviour.
- colleagues
- How to "call-in" , diffuse a situation, stop things from escalating and in the process help my colleagues
- ways, but also given tools to step in with incidents not involving colleagues, just with people interactions in general
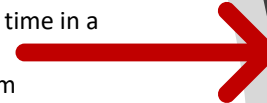
Further events are planned for 2025 . We will continue to deliver it as part of the Student Officer programme.

Ethical Dilemmas

What did you learn and how will you use the learning?
- ''Never make assumptions and always question what you see and hear.''
- ''Will learn to listen and apply accordingly to avoid issues/ damages.''
- ''taking a step back from my own assumptions / perspective and taking a more considerate approach.''
- ''Will make me re-assess how I deal with people during meetings.''
- '' To pause and reflect, consider others' views before making a decision.''
- '' ''To think first, look at other scenarios and don't jump to conclusions.''
- '' I found the dynamics of the group discussion very useful.''
- '' I learned about 'misophonia' – everything new is valuable to me. ''
- '' The ladder of inference was interesting.''
- '' This was well facilitated''
- ''The 5 levels of listening and the ladder of inference. ''
- ''I learned about the ladder of inference; I will collect more information before making my decision.''
- '' to be open to consider options and that different options. '' Ladder of inference''
- '' Different categories of solving dilemmas.''
- '' The 5 steps of listening – will use more next one to one, either chair or receive.''
- '' Talk to people. Don't be afraid to talk solutions through and explore solutions.''
- ''Management of ethical dilemmas in a team.''
- '' Different methods of listening and having conversations, use the NDM in decision making actively.''

Future sessions as outlined are arranged for 2025

What did you enjoy about this session?

- Passing on help and knowledge to others
- The benefits of not focussing on reports in isolation
- Signs of escalating behaviours , wider police support units
- The approach to violence against women
- Understanding of latest issues in RASSO area. Improtance of data analytics
- How invaluable venues and their staff are for providing first accounts and vital information to assist convictions
- Looking out for obvious signs and quick to react
- To look at investigations with a more holistic approach
- How important the security guard was to the victim. I would use this learning if someone needed help.
- The fact that you don't necessarily need lots of forensic work, ie DNA , fingerprints
- As a new officer it exposed us to the complexity of investigating
- About the importance of VAWG awareness and pursuing cases even if the physical evidence is lacking.
- The mistakes made in the past and to push for more patrols in the harder to reach areas
- I did not learn a lot unfortunately as even the questions we asked specifically for our department could not be answered.
- I learnt about Beds issues with cps and how they are trying to deal with the court situation going forward. I'm not sure I'll be able to use this tho.
- The importance of the security officer and how they cannot be ruled out for intelligence.

Mentivity

What did you enjoy about this session?

- '' The delivery and the passion showed by Sayce throughout the session.''
- ''Very wide ranging – history from century ago to today.
- ''presentation style, very approachable.''
- '' The presenter Sayce very interesting to hear personal experience and feedback he's received in the local community.''
- '' It was engaging and though provoking, not just someone talking at me which some courses are like.''
- ''it was informative and it was great to have non- judgemental space to discuss difficult topics.''
- ''Hearing the history of black people and how the history has shaped perceptions towards the police3. Also very open and honest discussions.''

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

- ''Origins of racism, understand and start from others experience and points of view.''
- ''An understanding behind why people from BAME/ diverse backgrounds face a sense of injustice and mistreat in policing.''
- '' I learned that there is still a long way to go in terms of improving relations between communities and the police.''
- How our use of power has a positive or negative impact''
- ''' I learned to look at things from a different perspective, why young black males behave and feel the way they do if engaging with police.''
- '' Inform others should future sessions be ran, to attend.'' Good to know Sayce is a part of the Policing committee and hopefully we will see more informed decision making.''

Future sessions arranged for 2025

These sessions are also part of the student officer induction programme

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City of London Corporation Committee Report

Committee(s): Professional Standards and Integrity Committee	Dated: 6 February 2025
Subject: Summary of Action Fraud public complaints data– Q3 2024/25	Public report: For Information
This proposal: • **provides statutory duties**	Public trust and confidence
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Deputy Commissioner Betts
Report author:	Detective Superintendent Carly Humphreys

Summary

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

During Quarter 3, Action Fraud recorded 140,464 reports on the National Fraud Database (92,706 crime reports and 47,758 Information reports). The complaint figures (total) represent 0.08% of the total number of Action Fraud reports recorded in Q3.

A total of 113 cases were logged in Q3 2024/25 which is an overall increase of 8 cases from Q2 2024/25 (7%). Within these cases there were 119 allegations recorded in Q3 2024/25. This is an increase of 11 allegations from Q2 2024/25 (15%).

The majority of these allegations (91/119) 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– Q3 2024/25
• Appendix 2 – City of London Police and Action Fraud Police Complaints Information Bulletin – Q2 2024/25

Carly Humphreys
Detective Superintendent Carly Humphreys
Head of Professional Standards

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Summary of Action Fraud public complaints data– Q3 2024/25				
Metric	**Current quarter (Q3)**	**Previous quarter (Q2)**	**(%) change (Q on Q)**	**Comment**
Complaints – Schedule 3	**1**	**1**	**0%**	A total of 113 cases were logged in Q3 2024/25. This is an overall increase of 8 cases from Q2 2024/25 (7%)
Complaints – not Schedule 3	**112**	**104**	**8%**	The average number of cases logged over the previous 5 quarters is 99 per quarter, Q3 is above average.
				It has been identified not all complaints logged in the AF SUGAR system have been logged into the PSD (centurion database). This is being rectified[1].
Allegations	**119**	**108**	**10%**	There were 119 allegations recorded in Q3 2024/25. This is an increase of 11 allegations from Q2 2024/25 (10%).
				The average number of allegations over the previous 5 quarters is 121 per quarter. Q3 is below average. ***Most cases have one allegation relating to AF matters.***
Average time to log complaints (days)	**N/A**	**6**		*Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.*
Average time to contact complainant (days)	**N/A**	**3**		
Complaints finalised – Schedule 3	**5**	**1**	**400%**	A total of 104 cases were finalised in Q3 2024/25. This is an overall increase of 28 cases from Q2 2024/25 (37%)
Complaints finalised - not Schedule 3	**99**	**76**	**30%**	Average number of total cases finalised is 82 over the last 5 quarters. Q3 is therefore above average.
Average time to finalise complaint cases (days) – Schedule 3	**Case combined data average 137 days**	**249**	**n/a**	*Timeliness is taken from IOPC published bulletins and available retrospectively.* *Quarter Case combined data average 137 days (ex subjudice) from Centurion.*
Average time to finalise complaint cases (days) – not Schedule 3		**150**	**n/a**	*IOPC bulletin will publish breakdown by case type logged (YTD)*
Applications for review sent to local policing body	**0**	**0**		None recorded during Q3
Applications for review sent to IOPC	**0**	**0**		None recorded during Q3

Nature of allegations – Of the 119 allegations recorded during Q3 2024/25 the highest number was in the category of, A1 – Police action following contact (91) followed by General level of Service (15). A3 – Information (9) and A2 Decisions (4) Reasons for complaint mostly relate to customer expectation of Action Fraud, with either the lack of contact or investigation cited. This is an increase in allegations recorded against Q2 of 11 (10%).

Members of Parliament –

There have been 42 miscellaneous cases logged where MPs have made contact with PSD on behalf of a constituent. This is similar to the previous quarter. The average being logged as 46 over the last 5 quarters. The general election took place during Q2. Many new M.P's started in their constituencies in the period coinciding with summer recess in parliament.
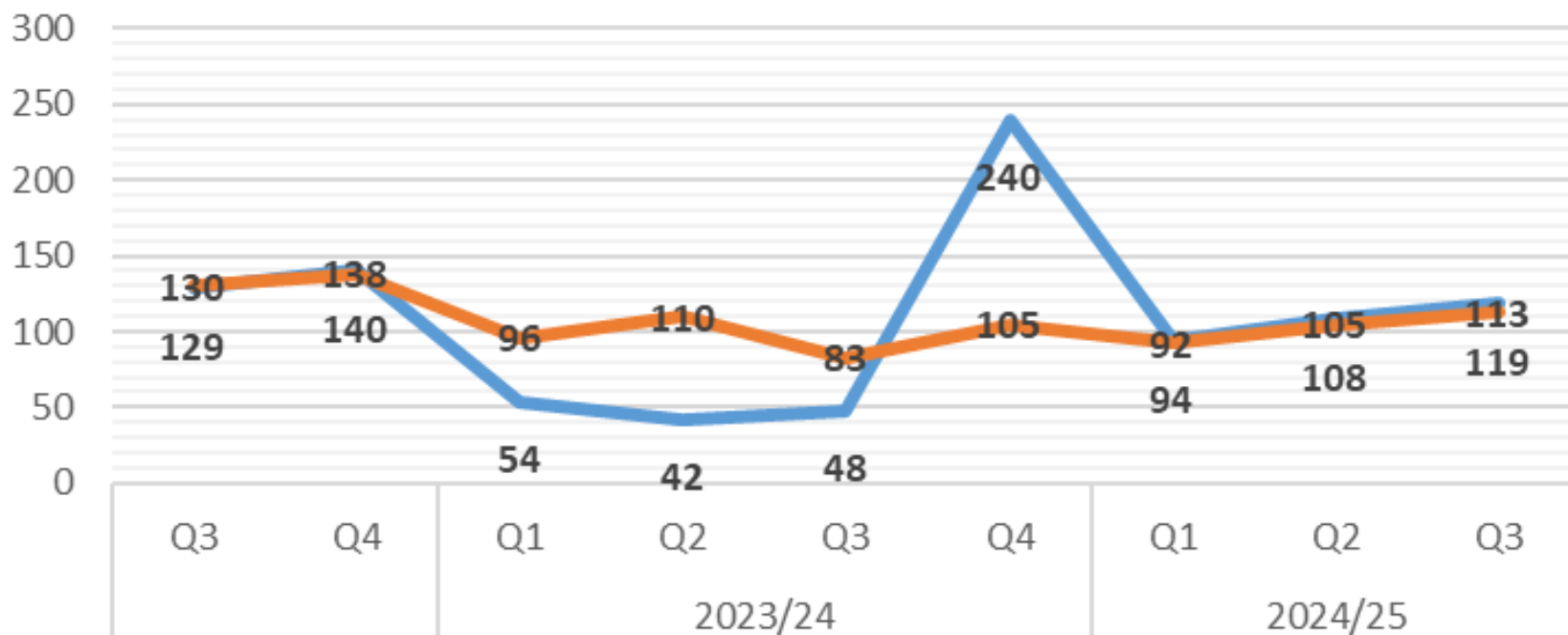
Action Fraud –

In **QTR 3** of the 2024/25 Financial Year Action Fraud recorded **140,464** reports on the National Fraud Database (**92,706** crime reports and **47,758** Information reports).

The complaint figures (total) represent 0.08% of the total number of Action Fraud reports recorded in Q3.

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

Action Fraud complaint data

——— Total Action Fraud Allegations recorded

——— Total Action Fraud Complaints logged

	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
					2023/24			2024/25	

Values:
- Q3: 130 / 129
- Q4: 138 / 140
- Q1: 96 / 54
- Q2: 110 / 42
- Q3: 83 / 48
- Q4: 240 / 105
- Q1: 92 / 94
- Q2: 105 / 108
- Q3: 113 / 119

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Police Complaints Information Bulletin: City of London and Action Fraud

Reporting Period: 01 April 2024 - 30 September 2024 (Q2 2024/25)

IOPC Independent Office for Police Conduct

About this bulletin

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

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

Please note: Unless stated otherwise, tables within the bulletin consist of 'year-to-date' figures covering all matters being started or completed between the two dates.
Q1: 1 April to 30 June, Q2: 1 April to 30 September, Q3: 1 April to 31 December, Q4: 1 April to 31 March

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

Contents

Acronyms used in this bulletin

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

Nat. – National, **RPRP** – Reflective Practice Review Process, **UPP** – Unsatisfactory Performance Procedure
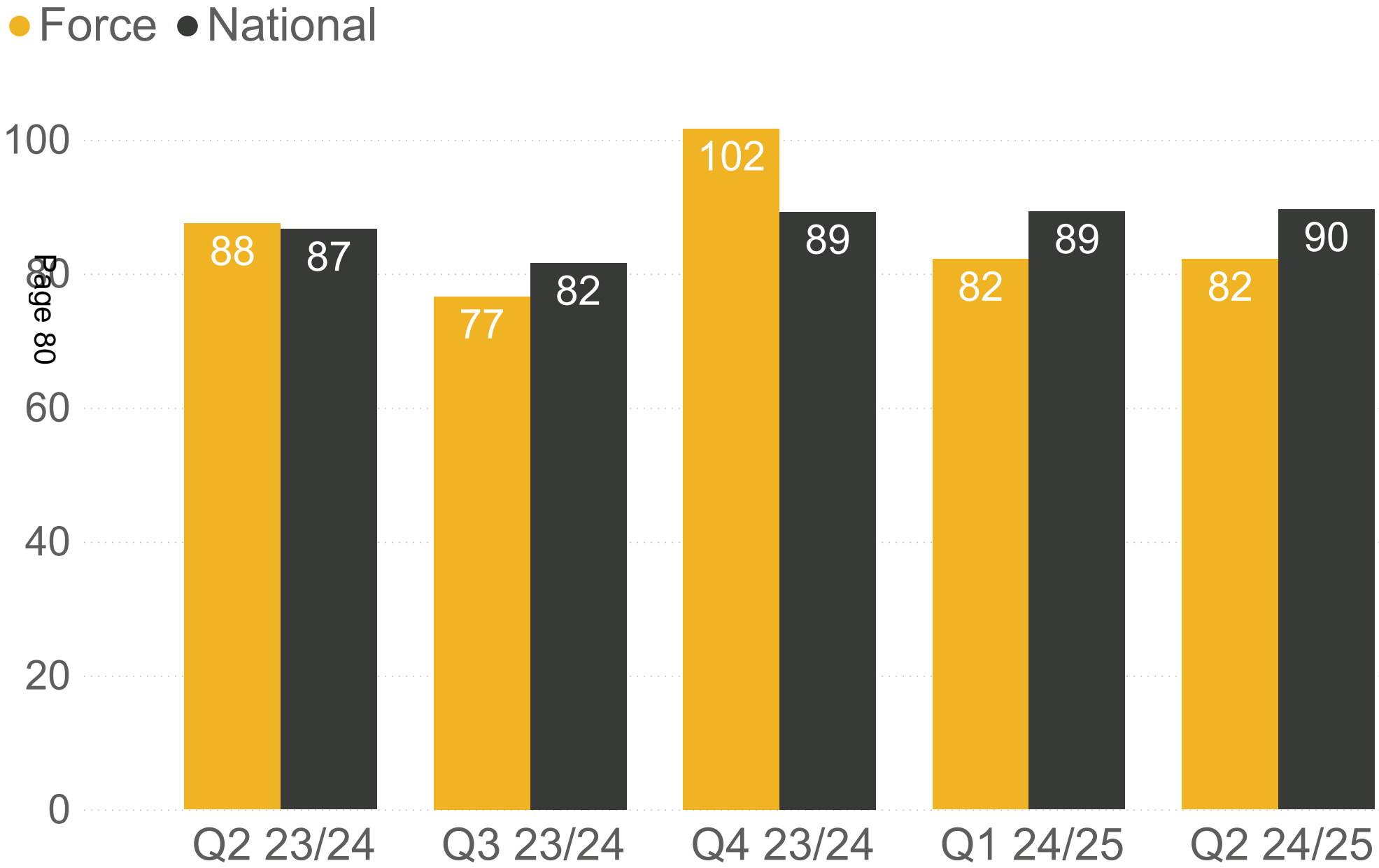
Section A1.1: Complaint cases and allegations logged

A complaint case is formed of one or more allegations. Numbers per 1,000 employees are used to demonstrate how the number of complaints/allegations against a force compare to their most similar force group and national figures. The force should contact the complainant and log the complaint as soon as possible after the complaint has been raised. Working days to contact/log is customer perspective.
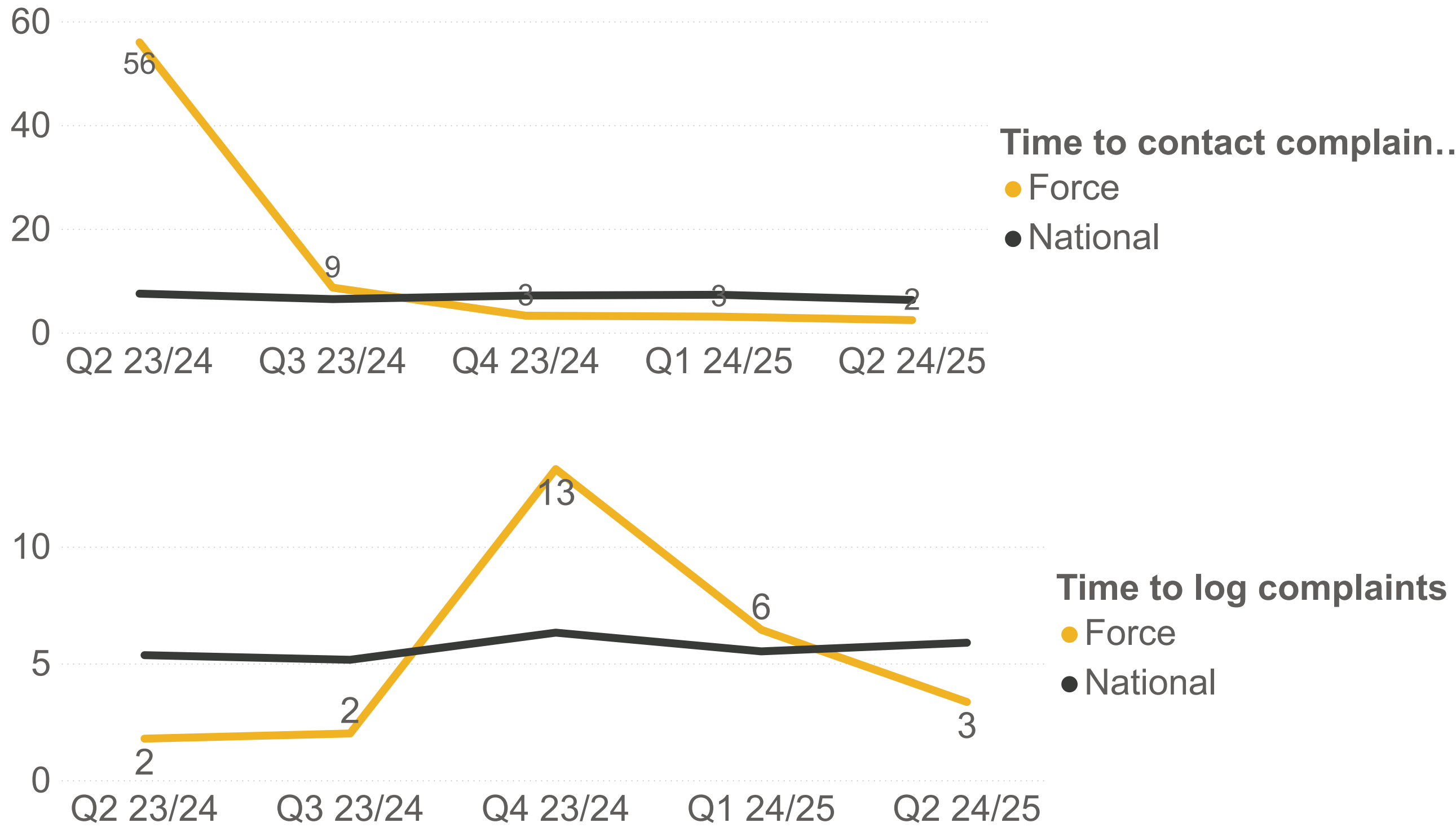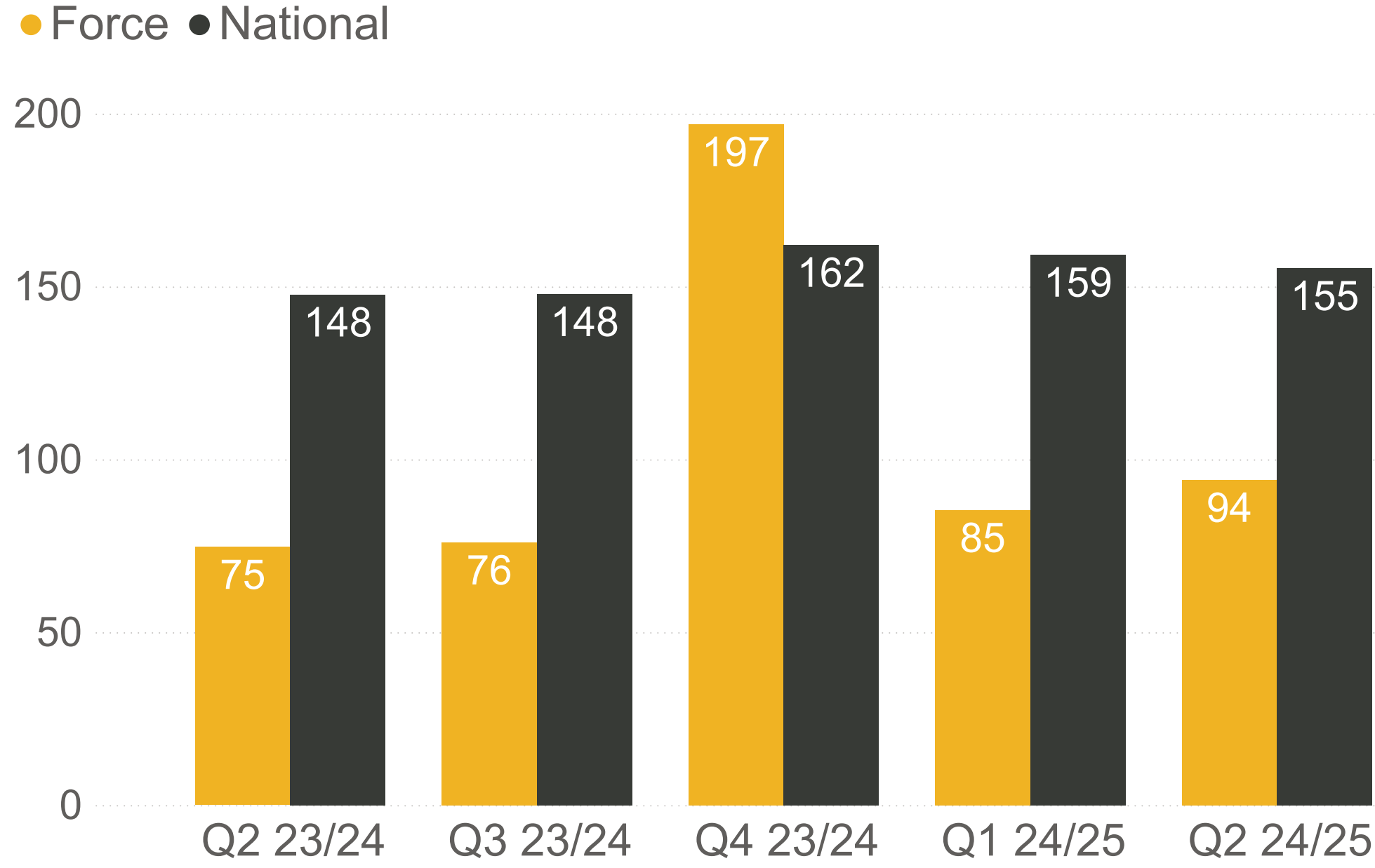
Note: Number of employees is a fixed number through the period, therefore complaints and allegations per 1,000 employees is higher for the full period (as in the table) than when broken down in to quarters (as per the charts)

Year to date	Complaint cases logged	Complaints per 1,000 employees	Allegations Logged	Allegations per 1,000 employees	Average working days to contact complainants	Average working days to log complaints
Force	264	164	288	179	3	5
SPLY	264	170	229	147	58	2
National	45,593	179	80,142	314	7	6

Complaints logged per 1,000 employees

● Force ● National

Allegations logged per 1,000 employees

● Force ● National

Time to contact complain..
● Force
● National

Time to log complaints
● Force
● National

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

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

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

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

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

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

Guidance on capturing data about police complaints.

Reason complaint case recorded under Schedule 3 (YTD)	Force	SPLY	National
AA/body responsible for initial handling decides	7	18	6,798
Complainant wishes the complaint be recorded	1	0	2,795
Dissatisfaction after initial handling	5	15	2,316
Nature of the allegation(s) in the complaint	4	11	3,441
Total	**17**	**44**	**15,350**

Reason complaint case recorded under Schedule 3 (YTD)	Force	SPLY	National
AA/body responsible for initial handling decides	41 %	41 %	44 %
Complainant wishes the complaint be recorded	6 %	0 %	18 %
Dissatisfaction after initial handling	29 %	34 %	15 %
Nature of the allegation(s) in the complaint	24 %	25 %	22 %

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

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

What has been complained about (YTD)

Year to date	Delivery of duties and service	Police powers, policies and procedures	Handling of or damage to property/ premises	Access and/or disclosure of information	Use of police vehicles	Discriminatory behaviour	Abuse of position/ corruption	Individual behaviours	Sexual conduct	Discreditable conduct	Other	Total
Force	216	22	6	8	2	12	2	19	0	1	0	**288**
SPLY	127	48	6	2	6	9	1	24	1	4	1	**229**
National	43,804	16,841	2,527	1,617	850	2,349	762	9,854	186	523	826	**80,139**

What has been complained about (force - year to date)
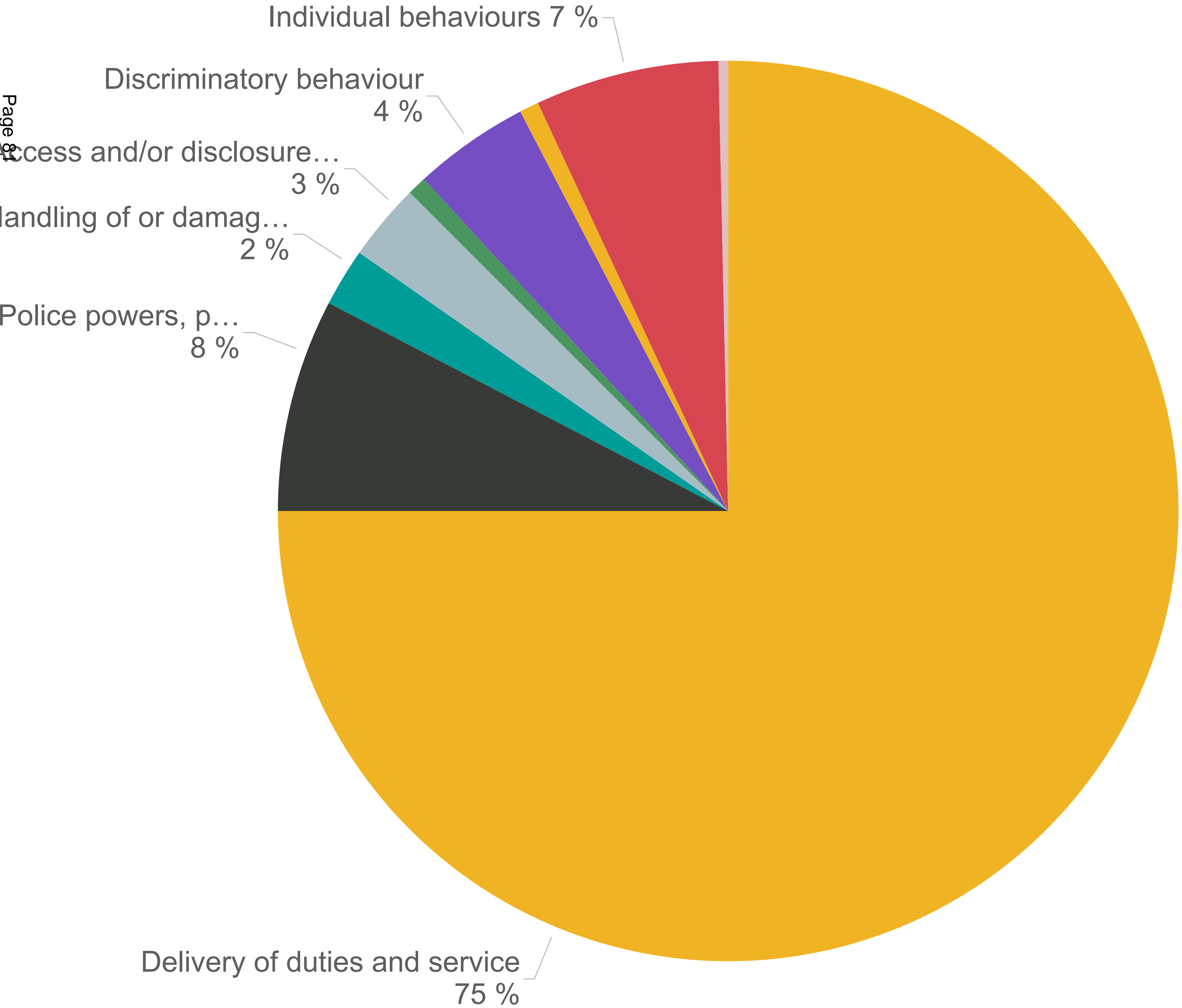
What has been complained about (national - year to date)
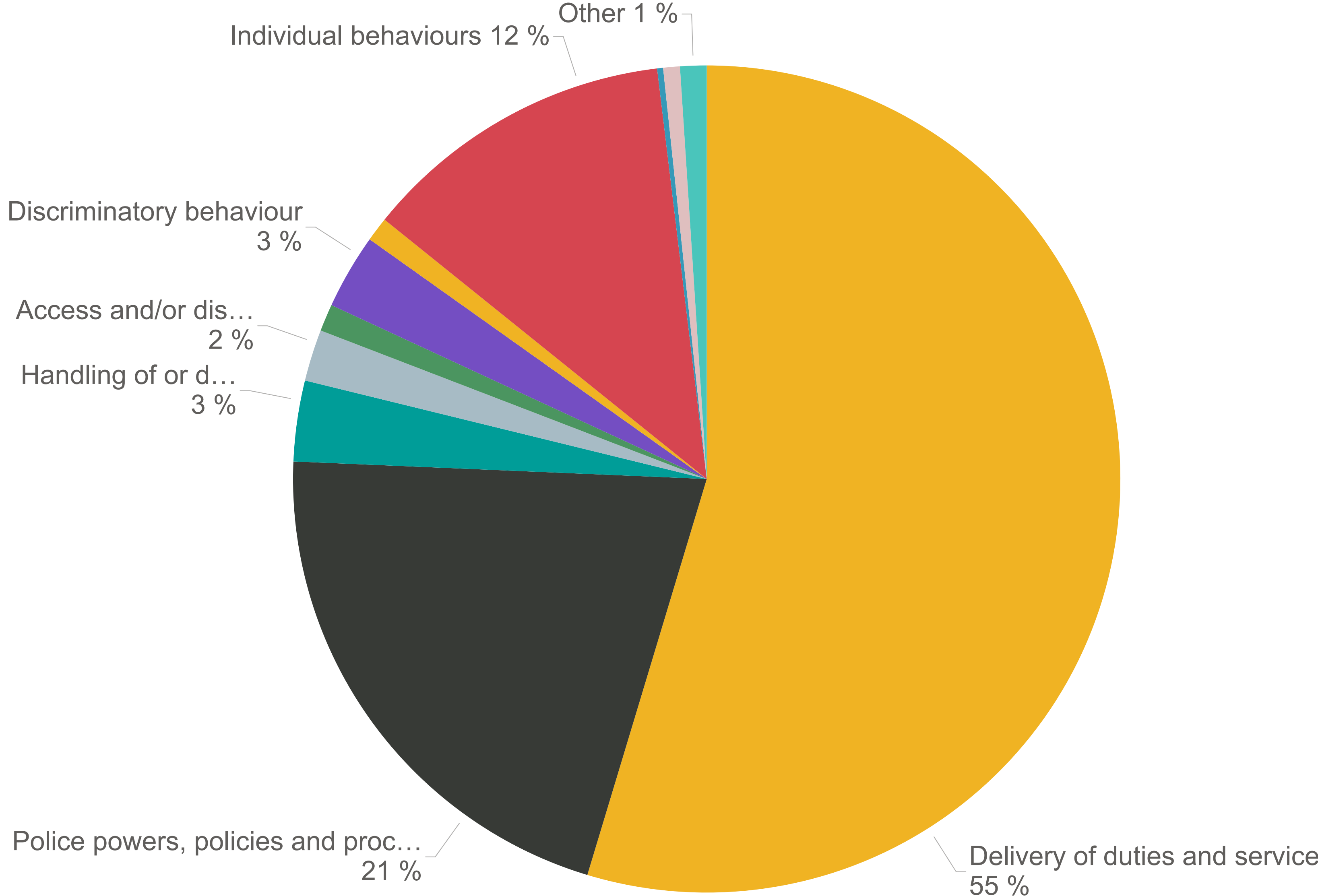
Section A1.4: Allegations logged – Top five allegation categories and their sub-categories (Year to date)

Category	Year to date Subcategory	Force		SPLY		National	
		No.	%	No.	%	No.	%
Delivery of duties and service	**Total**	**216**	**75 %**	**127**	**55 %**	**43,801**	**55 %**
	Police action following contact	165	76 %	90	71 %	18,035	41 %
	General level of service	29	13 %	18	14 %	14,604	33 %
	Information	20	9 %	10	8 %	4,976	11 %
	Decisions	2	1 %	9	7 %	6,186	14 %
Police powers, policies and procedures	**Total**	**22**	**8 %**	**48**	**21 %**	**16,837**	**21 %**
	Stops, and stop and search	5	23 %	2	4 %	793	5 %
	Power to arrest and detain	5	23 %	10	21 %	3,002	18 %
	Use of force	4	18 %	22	46 %	4,424	26 %
	Searches of premises and seizure of property	3	14 %	7	15 %	2,094	12 %
	Evidential procedures	2	9 %	3	6 %	1,283	8 %
	Detention in police custody	1	5 %	3	6 %	2,422	14 %
	Out of court disposals	1	5 %	0	0 %	249	1 %
	Other policies and procedures	1	5 %	1	2 %	1,615	10 %
	Bail, identification and interview procedures	0	0 %	0	0 %	955	6 %
Individual behaviours	**Total**	**19**	**7 %**	**24**	**10 %**	**9,853**	**12 %**
	Impolite language / tone	16	84 %	6	25 %	2,449	25 %
	Unprofessional attitude and disrespect	1	5 %	16	67 %	2,782	28 %
	Lack of fairness and impartiality	1	5 %	1	4 %	1,368	14 %
	Impolite and intolerant actions	1	5 %	0	0 %	1,498	15 %
	Overbearing or harassing behaviours	0	0 %	1	4 %	1,756	18 %
Discriminatory behaviour	**Total**	**12**	**4 %**	**9**	**4 %**	**2,349**	**3 %**
	Race	6	50 %	8	89 %	1,088	46 %
	Disability	5	42 %	0	0 %	439	19 %
	Gender reassignment	1	8 %	0	0 %	25	1 %
	Age	0	0 %	0	0 %	38	2 %
	Marriage and civil partnership	0	0 %	0	0 %	2	0 %
	Pregnancy and maternity	0	0 %	0	0 %	1	0 %
	Religion or belief	0	0 %	1	11 %	57	2 %
	Sex	0	0 %	0	0 %	394	17 %
	Sexual orientation	0	0 %	0	0 %	76	3 %
	Other	0	0 %	0	0 %	229	10 %
Access and/or disclosure of information	**Total**	**8**	**3 %**	**2**	**1 %**	**1,617**	**2 %**
	Disclosure of information	5	63 %	1	50 %	1,086	67 %
	Handling of information	2	25 %	0	0 %	340	21 %
	Use of police systems	1	13 %	1	50 %	128	8 %
	Decisions	0	0 %	0	0 %	0	0 %
	Accessing and handling of information from other sources	0	0 %	0	0 %	62	4 %
	Information	0	0 %	0	0 %	1	0 %

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

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

Section A1.5: National complaint factors

Year to date Factors on all allegations	Force		SPLY		National	
	Allegations Logged	% Allegations Logged	Allegations Logged	% Allegations Logged	Allegations Logged	% Allegations Logged
Fraud	197	68 %	104	45 %	485	1 %
Investigation	29	10 %	27	12 %	29,355	37 %
Roads/traffic	23	8 %	11	5 %	4,731	6 %
None	13	5 %	50	22 %	15,525	19 %
Arrest	10	3 %	10	4 %	10,232	13 %
Stop and/or search	7	2 %	3	1 %	1,618	2 %
Custody	3	1 %	3	1 %	4,574	6 %
Call Handling	1	0 %	0	0 %	3,424	4 %
Domestic / gender abuse	1	0 %	3	1 %	4,125	5 %
Hate Crime	1	0 %	0	0 %	468	1 %
Mental health	1	0 %	1	0 %	2,317	3 %
Police dogs or horses	1	0 %	0	0 %	54	0 %
Premises search	1	0 %	5	2 %	1,958	2 %
Public order incident	1	0 %	0	0 %	645	1 %
Child protection / CSA / CSE	0	0 %	1	0 %	1,370	2 %
Coronavirus - other	0	0 %	0	0 %	0	0 %
Coronavirus - police powers on infectiou	0	0 %	0	0 %	1	0 %
Coronavirus - police powers on restricti	0	0 %	0	0 %	0	0 %
Covert policing	0	0 %	0	0 %	48	0 %
Death	0	0 %	0	0 %	759	1 %
Drugs / alcohol	0	0 %	0	0 %	897	1 %
Firearms	0	0 %	1	0 %	400	0 %
Missing persons	0	0 %	0	0 %	514	1 %
Neighbourhood policing	0	0 %	0	0 %	3,752	5 %
PPDA	0	0 %	0	0 %	7	0 %
PPDA - Police victim	0	0 %	0	0 %	3	0 %
Prejudicial and improper behaviour	0	0 %	0	0 %	1	0 %
Restraint equipment	0	0 %	6	3 %	855	1 %
Serious injury	0	0 %	0	0 %	168	0 %
Social media	0	0 %	0	0 %	330	0 %
Taser	0	0 %	0	0 %	105	0 %
Unknown	0	0 %	0	0 %	20	0 %
VAWG' - dissatisfaction handling	0	0 %	0	0 %	14	0 %
VAWG - dissatisfaction handling	0	0 %	1	0 %	3,054	4 %
VAWG - police perpetrated	0	0 %	2	1 %	539	1 %
VAWG' - police victim	0	0 %	0	0 %	14	0 %

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

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

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

Factors on top five allegation categories (Year to date) ▼	Delivery of duties and service	Police powers, policies and procedures	Access and/or disclosure of information	Discriminatory behaviour	Individual behaviours
Stop and/or search	0	4	0	1	1
Roads/traffic	2	8	0	3	5
Public order incident	0	1	0	0	0
Premises search	0	1	0	0	0
Police dogs or horses	0	0	0	0	1
None	9	0	0	1	3
Mental health	0	0	0	1	0
Investigation	16	1	5	2	3
Hate Crime	1	0	0	0	0
Fraud	187	1	2	3	3
Custody	0	1	0	0	2
Call Handling	0	0	0	0	1
Arrest	0	6	1	2	0
Total	**215**	**22**	**8**	**12**	**19**

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

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

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

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

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

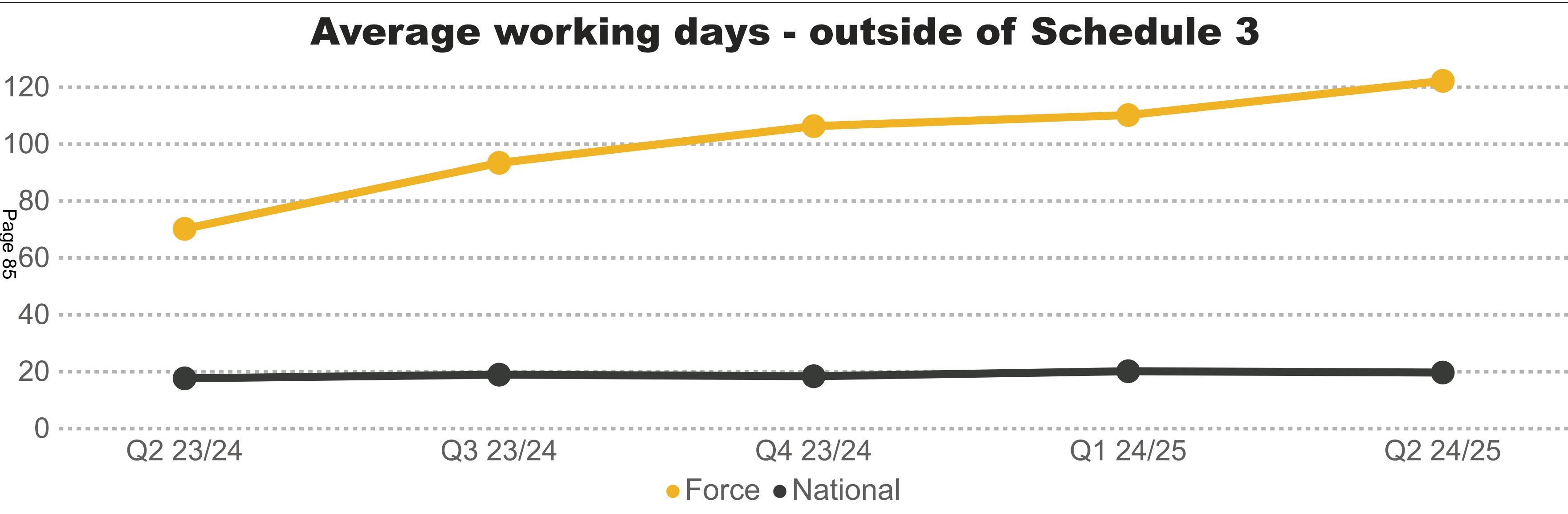| IOPC Police Data Year Quarter ▼	VAWG - dissatisfaction handling	VAWG - police perpetrated	VAWG - police victim	Total
Q2 23/24	0	1	0	1
Total	**0**	**1**	**0**	**1**

Section A2: Allegations timeliness

This section presents the time it takes the force to finalise allegations by how they were handled. It gives a breakdown of allegations handled informally outside of Schedule 3 and those that were handled formally by either by investigation or handled other than by investigation. Timeliness is calculated from the date the allegation was received by the force to the day the complainant is informed of the allegation decision.
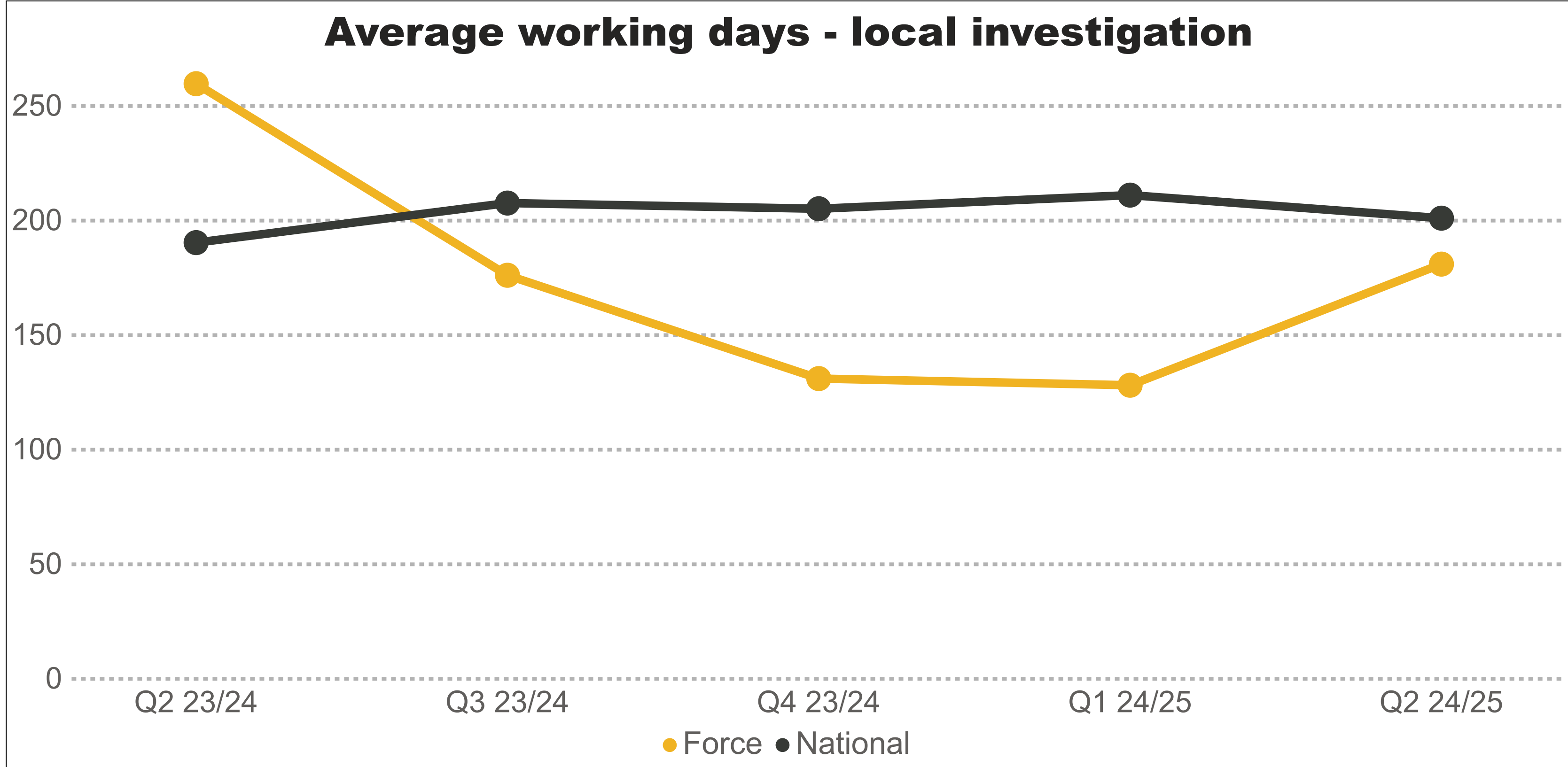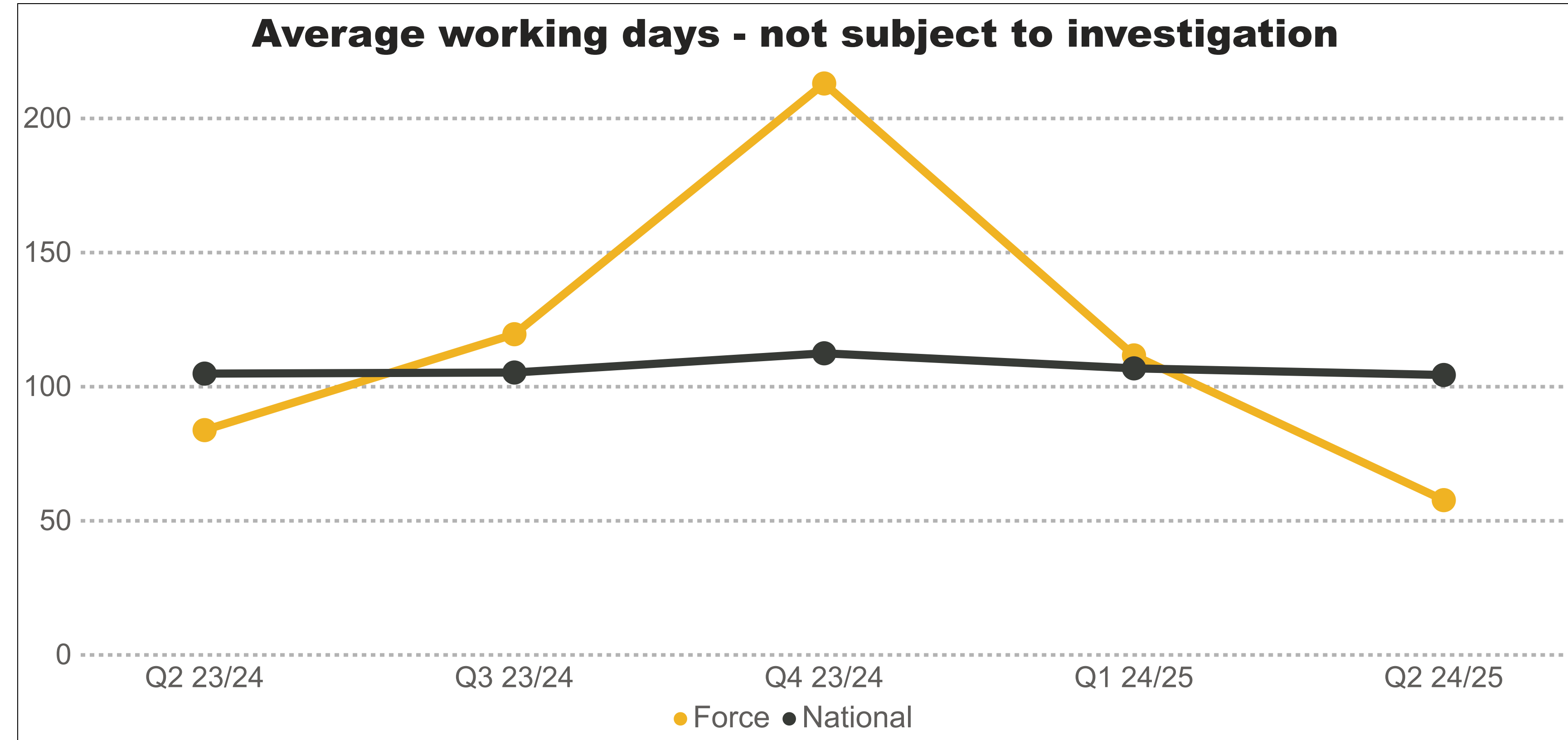
Independent investigation figures do not include conduct or death/serious injury investigations which are also investigated by the IOPC.

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

Year to date	Outside of Schedule 3		Under Schedule 3 - not subject to investigation		Under Schedule 3 - by local investigation		Under Schedule 3 - by independent investigation	
Allegations	Number Finalised	Average days	Number Finalised	Average days	Number Finalised	Average days	Number Finalised	Average days
Force	194	116	27	90	28	147	0	0
SPLY	129	58	32	80	26	197	0	0
National	33,250	20	35,230	105	8,680	206	109	282

Average working days - outside of Schedule 3

Year to date	Under Schedule 3 - by directed investigation	
Allegations	Number Finalised	Average days
Force	0	0
SPLY	0	0
National	16	544

Average working days - not subject to investigation

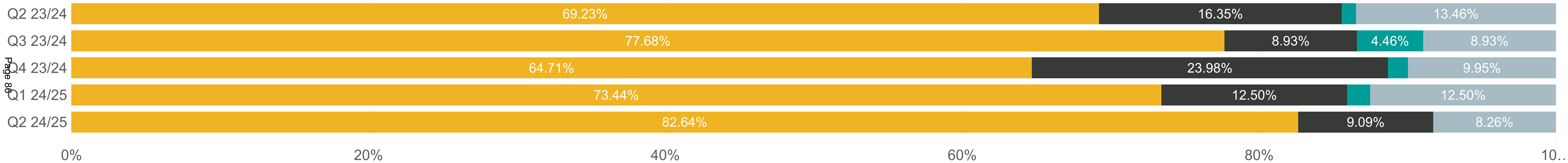### Average working days - local investigation

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

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

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

Please refer to our Guidance on capturing data about police complaints for details of allegation decisions.

How allegations were handled (Year to date) ▼	Force No.	Force %	MSF Average No.	MSF Average %	National No.	National %
Under Schedule 3 investigated (not subject to special procedures)	26	10 %			7,922	10 %
Under Schedule 3 investigated (subject to special procedures)	2	1 %			883	1 %
Under Schedule 3 - not investigated	27	11 %			35,230	46 %
Outside of Schedule 3	194	78 %			33,250	43 %
Total	249	100 %			77,285	100 %

Force: percent of allegations finalised by handling method

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

Period	Outside of Schedule 3	Under Schedule 3 - not investigated	Subject to special	Not subject to special
Q2 23/24	69.23%	16.35%		13.46%
Q3 23/24	77.68%	8.93%	4.46%	8.93%
Q4 23/24	64.71%	23.98%		9.95%
Q1 24/25	73.44%	12.50%		12.50%
Q2 24/25	82.64%	9.09%		8.26%

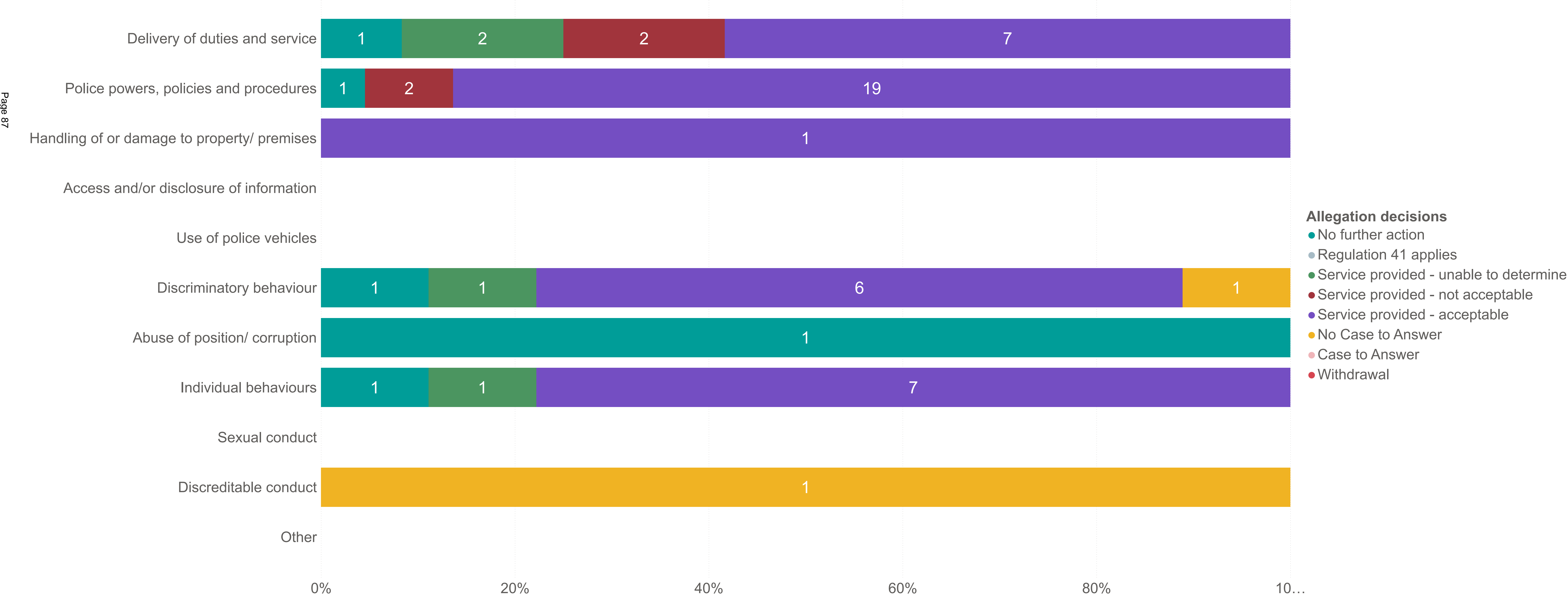| How allegations were handled (Year to date)	Outside of Schedule 3				Under Schedule 3 - not investigated				Under Schedule 3 investigated (subject to special procedures)				Under Schedule 3 investigated (not subject to special procedures)			
Allegation decision ▼	Force No.	Force %	National No.	National %	Force No.	Force %	National No.	National %	Force No.	Force %	National No.	National %	Force No.	Force %	National No.	National %
No further action				0 %	3	11 %	2,768	4 %			9	0 %	2	8 %	242	0 %
Regulation 41 applies				0 %			59	0 %			1	0 %			93	0 %
Service provided - unable to determine				0 %	4	15 %	3,238	4 %			10	0 %			770	1 %
Service provided - not acceptable				0 %	4	15 %	4,563	6 %			26	0 %			900	1 %
Service provided - acceptable				0 %	16	59 %	23,538	30 %			129	0 %	24	92 %	5,675	7 %
Not Resolved	19	10 %	1,876	2 %				0 %				0 %				0 %
Resolved	175	90 %	31,373	41 %				0 %				0 %				0 %
No Case to Answer				0 %				0 %	2	100 %	512	1 %				0 %
Case to Answer				0 %				0 %			180	0 %				0 %
Withdrawal				0 %			1,063	1 %			16	0 %			242	0 %
Total	194	78 %	33,249	43 %	27	11 %	35,229	46 %	2	1 %	883	1 %	26	10 %	7,922	10 %

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

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

Outside Schedule 3 allegation decisions

Allegation decisions	Delivery of duties and service	Police powers, policies and procedures	Handling of or damage to property/ premises	Access and/or disclosure of information	Use of police vehicles	Discriminatory behaviour	Abuse of position/ corruption	Individual behaviours	Sexual conduct	Discreditable conduct	Other	Total
Resolved	138	13	7	2	2	5	1	7	0	0	0	**175**
Not Resolved	13	2	0	1	0	1	1	1	0	0	0	**19**

Schedule 3 allegation decisions

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

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

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

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

Actions following outside of Schedule 3 complaint cases ▲	Force		SPLY		National	
	Allegations Finalised	% Allegations Finalised	Allegations Finalised	% Allegations Finalised	Allegations Finalised	% Allegations Finalised
Organisational learning	1	1 %	0	0 %	132	0 %
Learning from reflection	0	0 %	1	1 %	935	3 %
Policy review	0	0 %	0	0 %	32	0 %
Goodwill gesture	0	0 %	0	0 %	52	0 %
Apology	5	3 %	11	9 %	3,241	10 %
Debrief	0	0 %	0	0 %	311	1 %
Explanation	162	84 %	97	76 %	20,147	61 %
No further action	25	13 %	18	14 %	3,760	11 %
Other action	1	1 %	0	0 %	4,135	12 %

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

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

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

All complaint cases handled under Schedule 3

. Actions following Schedule 3 complaint cases	Force		SPLY		National	
	Allegations Finalised	% Allegations Finalised	Allegations Finalised	% Allegations Finalised	Allegations Finalised	% Allegations Finalised
Organisational learning	1	2 %	0	0 %	398	1 %
Apology	1	2 %	5	8 %	1,605	4 %
Debrief	0	0 %	0	0 %	1,343	3 %
Explanation	24	44 %	19	32 %	27,139	62 %
Unsatisfactory Performance Procedure (UPP)	0	0 %	0	0 %	11	0 %
No further action	27	49 %	30	51 %	9,817	22 %
Other action	0	0 %	1	2 %	432	1 %
Learning from reflection	2	4 %	2	3 %	2,263	5 %
Referral to RPRP	0	0 %	1	2 %	671	2 %

Misconduct, UPP and RPRP on complaints investigated under Schedule 3 (subject to Special Procedures)
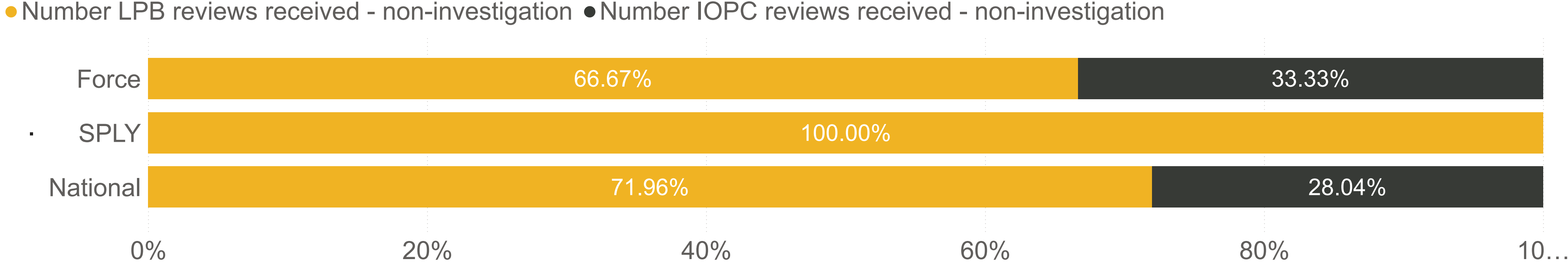
Complaint cases handled under Schedule 3 that are investigated **and** subject to Special Procedures can result in misconduct proceedings

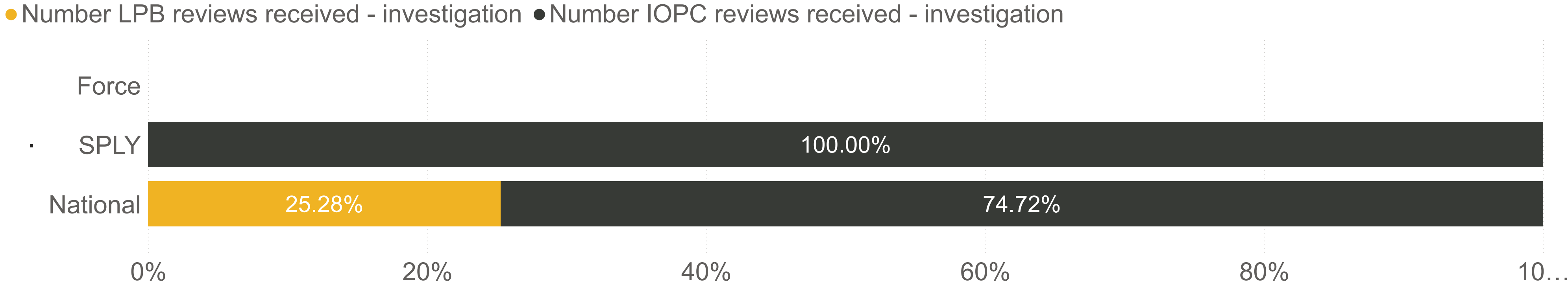| . Actions following Schedule 3 (special procedures) cases	Force		SPLY		National	
	Allegations Finalised	% Allegations Finalised	Allegations Finalised	% Allegations Finalised	Allegations Finalised	% Allegations Finalised
Misconduct proceedings	0	0 %	1	100 %	77	9 %
Unsatisfactory Performance Procedure (UPP)	0	0 %	0	0 %	2	0 %
Other actions following a case to answer decision	0	0 %	0	0 %	64	7 %
Referral to RPRP	0	0 %	0	0 %	161	18 %

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

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

Non-investigation reviews received	LPB	IOPC
Force	2	1
SPLY	1	0
National	1,850	721

● Number LPB reviews received - non-investigation   ● Number IOPC reviews received - non-investigation

Force	66.67% / 33.33%
SPLY	100.00%
National	71.96% / 28.04%

Investigation reviews received	LPB	IOPC
Force	0	0
SPLY	0	3
National	159	470

● Number LPB reviews received - investigation   ● Number IOPC reviews received - investigation

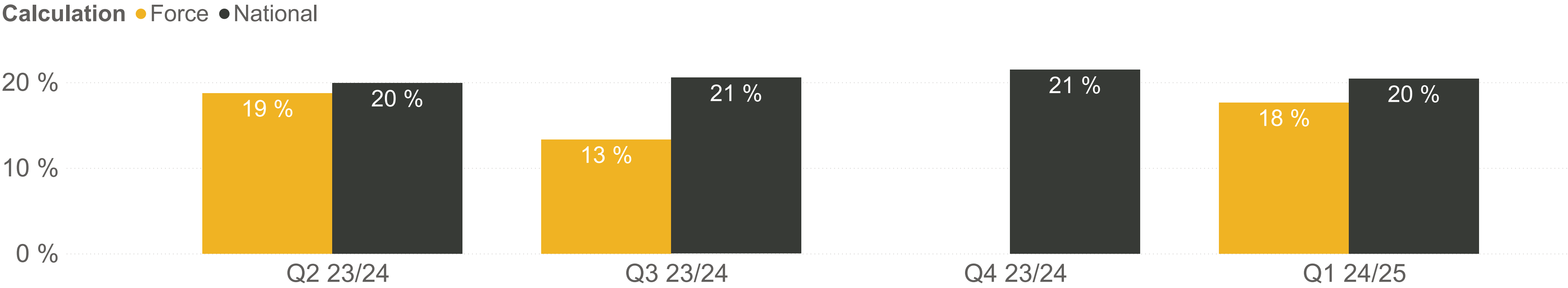|	
Force	
SPLY	100.00%
National	25.28% / 74.72%

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

.	Reviews received	Schedule 3 complaints finalised
Force	3	24
SPLY	4	24
National	3,200	15,484

Reviews received as a proportion of Schedule 3 cases

Calculation ● Force ● National

	Q2 23/24	Q3 23/24	Q4 23/24	Q1 24/25
Force	19 %	13 %		18 %
National	20 %	21 %	21 %	20 %

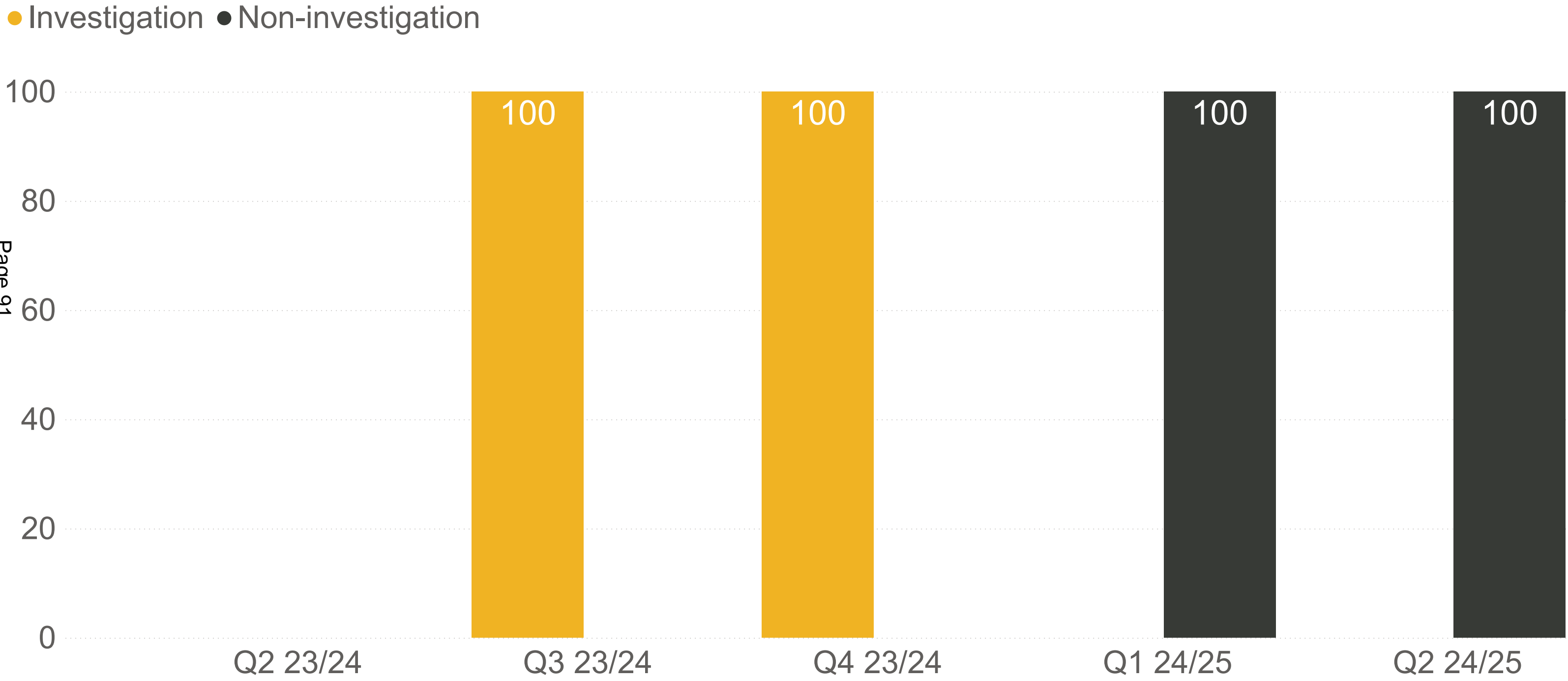|	Force	SPLY	National
Average number of working days to complete Local Policing Body reviews	0	14	49
Average number of working days to complete IOPC reviews	152	128	138

Section C2: Outcomes on reviews

This section presents information about the decisions made on reviews including the proportion of reviews that found the outcome of the complaint was not reasonable and proportionate, those which resulted in a recommendation and, if necessary, a direction to the appropriate authority in respect of any person serving with the police. Please note: Numbers are not available for the MSF Average - % only. Contact the IOPC for specific recommendations and directions made as these are not available in this data set
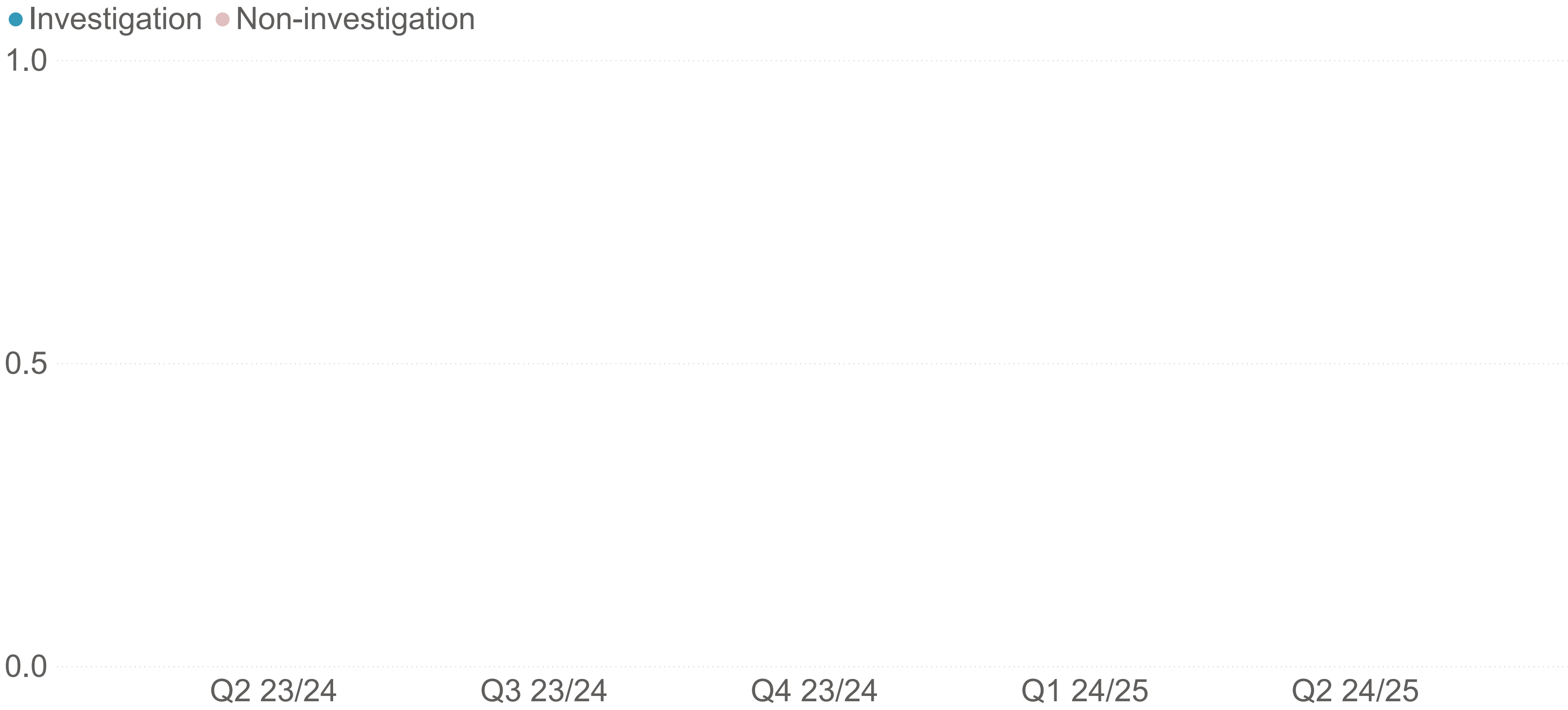
Investigation reviews (YTD) ▲	Completed investigation (IOPC)	Upheld investigation (IOPC)	Completed investigation (LPB)	Upheld investigation (LPB)
Force	1	0	0	
SPLY	0	0	0	
National	453	139	157	39

Non-investigation reviews (YTD) ▲	Completed non-investigation (IOPC)	Upheld non-investigation (IOPC)	Completed non-investigation (LPB)	Upheld non-investigation (LPB)
Force	1	1	0	
SPLY	1	0	1	
National	452	144	1,825	363

% IOPC reviews upheld - Force

● Investigation ● Non-investigation

% LPB Reviews upheld - Force

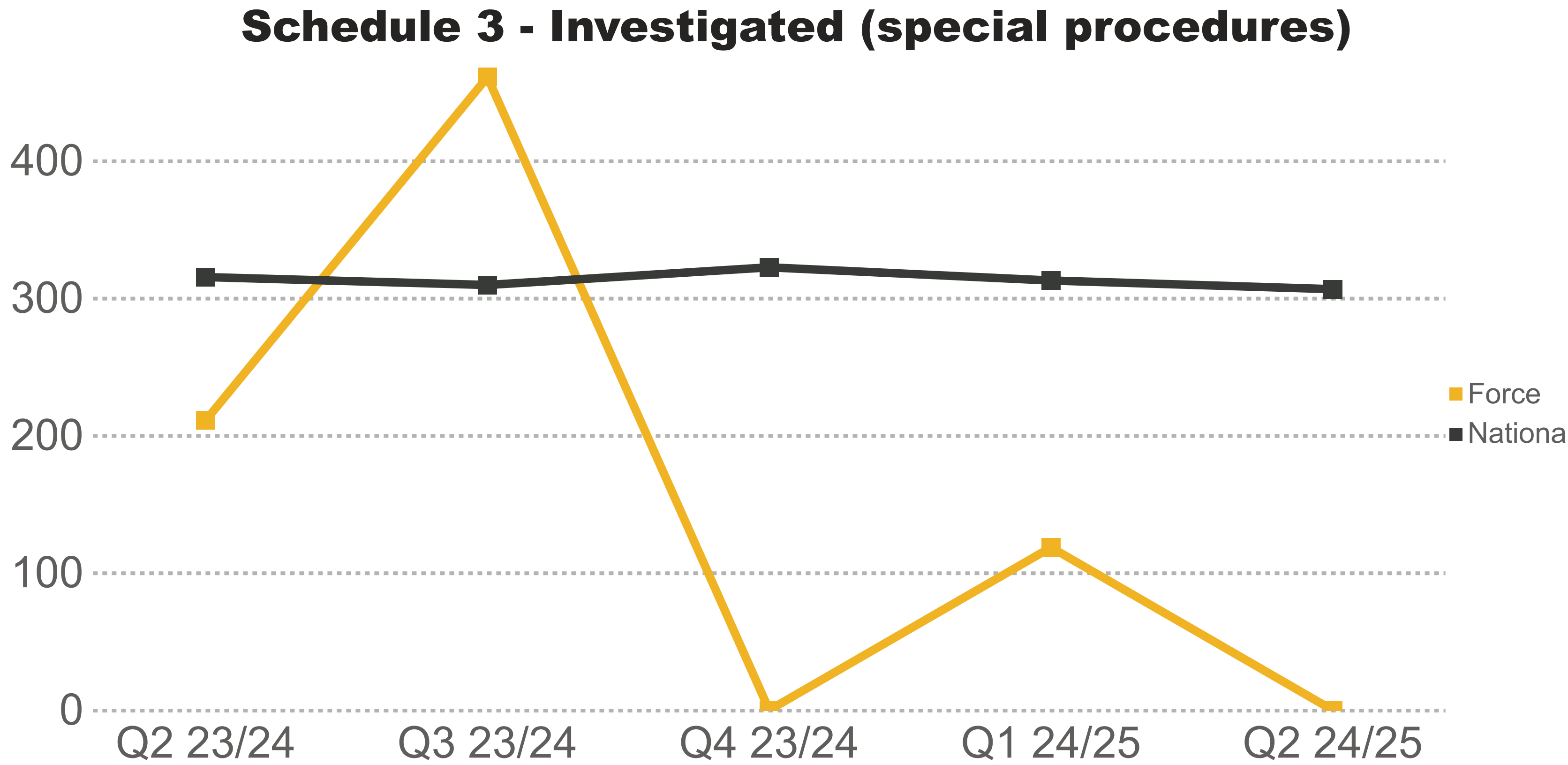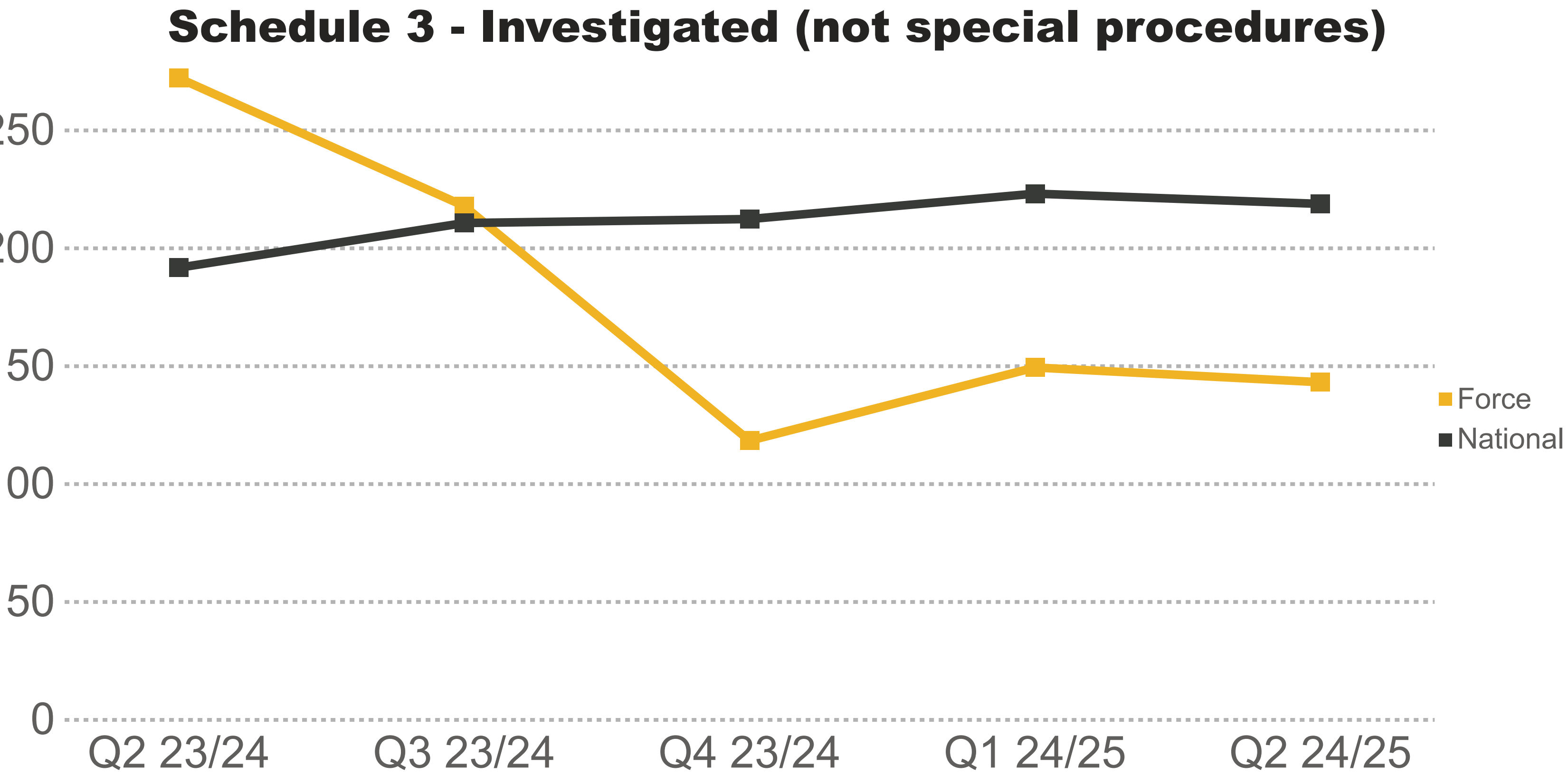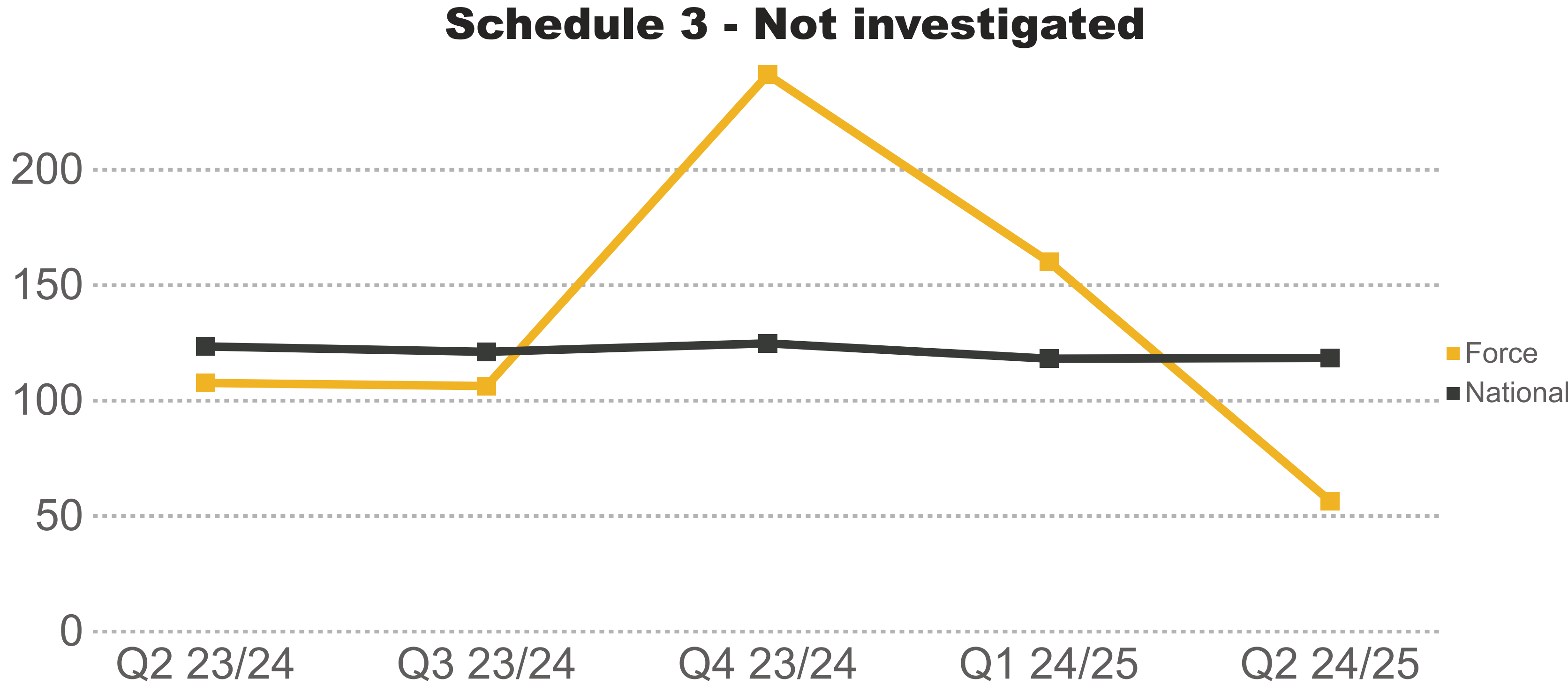● Investigation ● Non-investigation

Section D1: Complaint cases finalised under Schedule 3 - timeliness

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

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

Average working days to finalise (Year to date) ▼	Force	SPLY	National
Under Schedule 3 investigated (subject to special procedures)	119	211	310
Under Schedule 3 investigated (not subject to special procedures)	146	236	221
Under Schedule 3 - not investigated	138	106	118
Total	**139**	**143**	**140**

Number finalised (Year to date)	Force	SPLY	National
Under Schedule 3 - not investigated	14	17	12,474
Under Schedule 3 investigated (not subject to special procedures)	8	6	2,681
Under Schedule 3 investigated (subject to special procedures)	2	1	329
Total	**24**	**24**	**15,484**

Schedule 3 - Not investigated

Schedule 3 - Investigated (not special procedures)

### Schedule 3 - Investigated (special procedures)

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

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

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

Year to date

|	Force	SPLY	National
Complaint cases handled outside of Schedule 3	181	99	27766
Average days to finalise complaint cases handled outside of Schedule 3	123	58	22

Outside Schedule 3
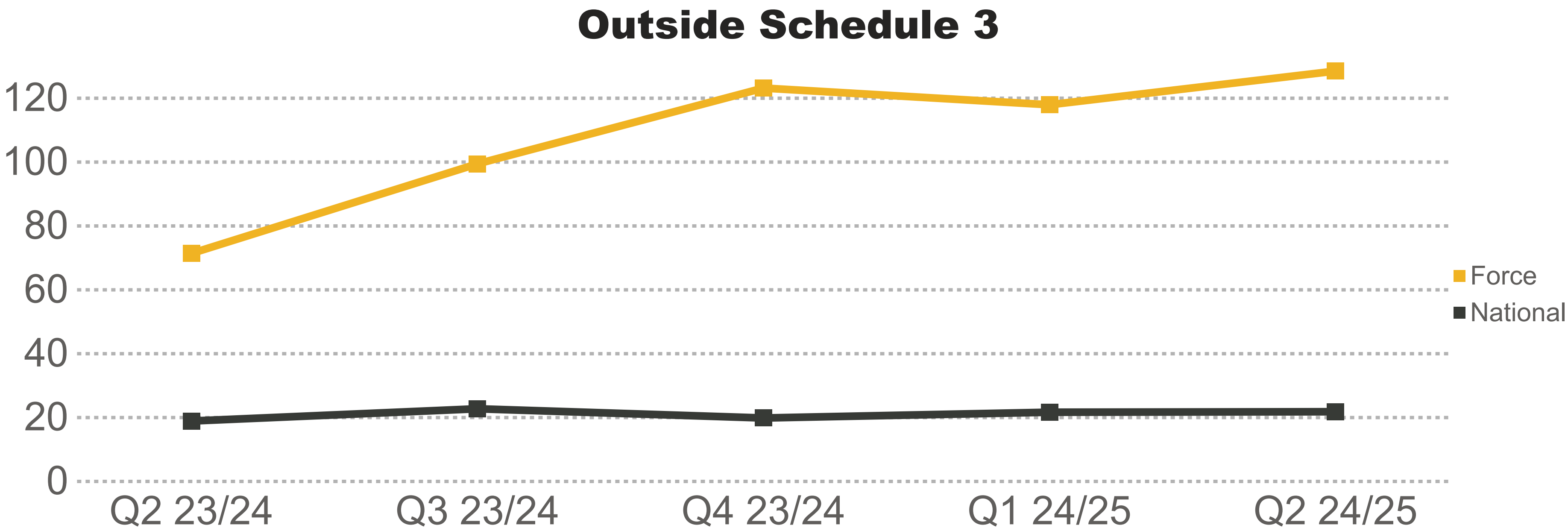
Section D3: How complaint cases handled

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

.	Force		SPLY		National	
Means Of Handling	Complaints Finalised	% Finalised	Complaints Finalised	% Finalised	Complaints Finalised	% Finalised
Outside of Schedule 3	181	88%	99	80%	27,766	64%
Under Schedule 3 - not investigated	14	7%	17	14%	12,474	29%
Under Schedule 3 investigated (not subject to special procedures)	8	4%	6	5%	2,681	6%
Under Schedule 3 investigated (subject to special procedures)	2	1%	1	1%	329	1%
Total	205	100%	123	100%	43,250	100%

Force: percent of complaint cases finalised by handling method

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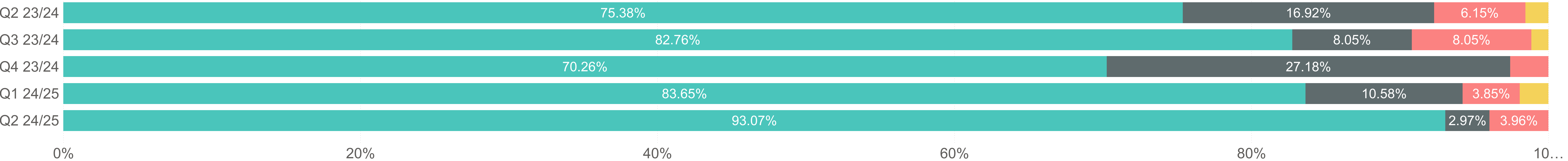
Section E: Referrals

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

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

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

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

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

Year to date

	Force	SPLY	National
Number referrals received	17	21	3,490
Number referrals completed	22	21	3,490
Decision: Independent Investigation	3	2	206
Decision: Directed Investigation	0	0	5
Decision: Local Investigation	14	17	1,935
Decision: Return to Force	4	2	1,262
Decision: Invalid	1	0	80

Force and MSF Group referrals received
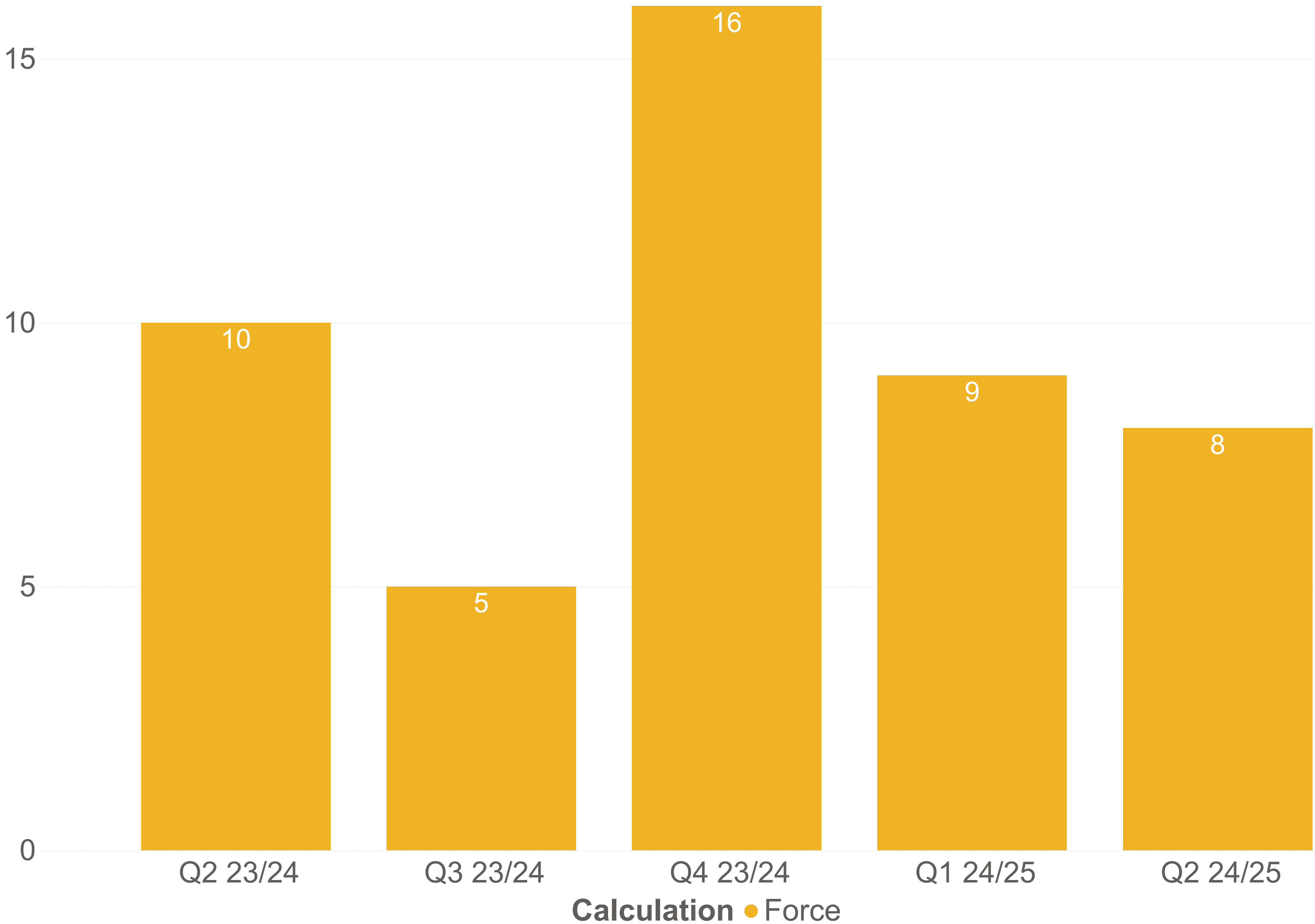
Most Similar Force (MSF) Group:

Notes

Data sources

- Data in this bulletin is taken from XML data submissions made by forces to the IOPC every quarter except for IOPC performance data which is taken from the IOPC case management system.

- Police force employee numbers are taken from the latest police workforce England and Wales statistics published by the Home Office.

- The most similar force (MSF) groups used for the calculation of the MSF averages in this bulletin are those determined by HMICFRS. Please note that the British Transport Police and City of London Police do not have an MSF group. A list of the MSF groups is available on the IOPC website.

- Figures for City of London include complaint cases logged in relation to 'Action Fraud'. Action Fraud is the UK's national reporting centre for fraud and cybercrime. The service is run by the City of London Police, which is the national policing lead for economic crime.

Performance Framework counting rules and calculation

- The counting rules and calculations used to produce the data shown in this bulletin can be found on the IOPC website.

- Average times are presented in working days and do not include weekends or bank holidays.

- Some percentages may add up to more or less than 100% due to rounding.

- Complaint cases and allegations with invalid start/end dates have been removed from average time calculations. Therefore, the numbers of complaint cases and allegations used in the average time calculations may be lower than the total number of complaint cases and allegations logged or finalised.

Data constraints

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

Further Information

- A glossary providing a full list of definitions used in this bulletin, can be found on the IOPC website.

- Additional information about the recording of police complaints, including the definitions of the complaint categories, can be found in appendix A of the IOPC's Guidance on capturing data about police complaints.

- Information about how the police complaints system operates, who can complain and how reviews are dealt with can be found in the IOPC's Statutory Guidance on the police complaints system (February 2020).

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Committee(s): Professional Standards and Integrity Committee – For Information	Dated: 06 February 2025
Subject: Professional standards, conduct, and vetting Update Q3	Public report: For Information
This proposal: • **delivers Corporate Plan 2024-29 outcomes** • **provides statutory duties** • **provides business enabling functions**	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	£-
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Commissioner of Police	
Report author: D/Supt Humphreys/PC Ann Roberts Professional Standards Dept	

Summary

- Overall, the volume of Complaints has increased by 41% (12 complaints) in comparison to Quarter 2. There have been no new Conduct Cases recorded this Quarter.
- 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 continues to benefit from an uplift in resources, improved processes and staff training which has resulted in sustained improvements regarding service delivery.

Recommendations

Members are asked to:

- Note the report.

Main Report

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

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

1. This document contains the statistics prepared by the Professional Standards Directorate for the third quarter of 2024/25 (Oct - Dec).

2. This quarter the total number of CoLP complaint cases logged is 41.

3. This is separated into 4 dealt with under Schedule 3 of the Police Reform Act 2002 and 37 not within Schedule 3. This figure of 41 complaints is an increase of 12 compared against Q2 where a total of 29 complaints were logged; 9 under Schedule 3, and 20 not within Schedule 3. Compared against the same period (Q3) last year 2023/24 the total number of CoLP complaint cases logged was 39. (9 Schedule 3 and 30 not within Schedule 3).

4. Of the 70 allegations recorded during Q3 2024/25 the highest number were in the categories of: Police action following contact (16) Handling of/or damage to property/premises (8) Use of Force (5) Bail, identification and interview procedures (5)

5. Information, Searches of premises and seizure of property, Power to arrest and detain, and Use of police vehicles all had 4 allegations each allegation type.

6. This is an increase in allegations recorded against Q2 of 27 (63%).

7. Q3 has 4 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.

Q3 Top Allegations 2024/25

- Police action following contact
- Handling of or damage to property/premises
- Use of force
- Bail, identification and interview procedures
- Information
- Searches of premises and seizure of property
- Power to arrest and detain
- Use of police vehicles
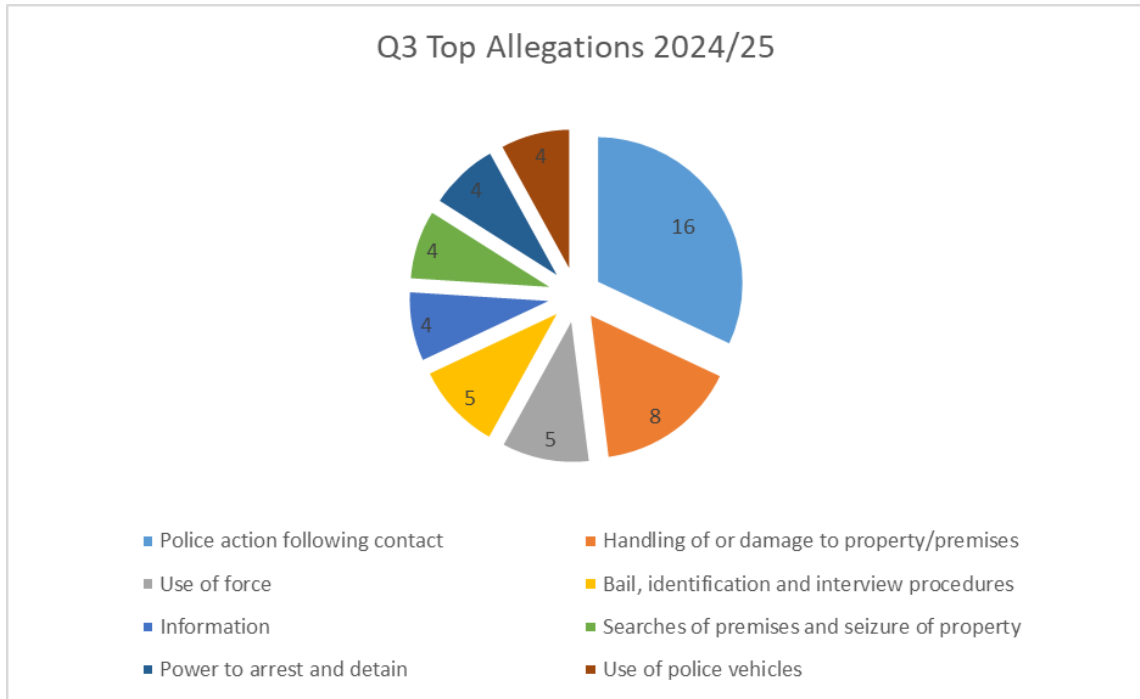
8. The allegation type 'Police action following contact' remains the highest allegation type across annual (2022/23 & 2023/24) and quarterly data. Handling of/or damage to property/premises also featured as a high allegation category 2023/24 and has returned in Q3 to the top 5, as does Use of Force and Power to arrest and detain.

Top Five Allegation Categories years 2022/23 & 2023/24
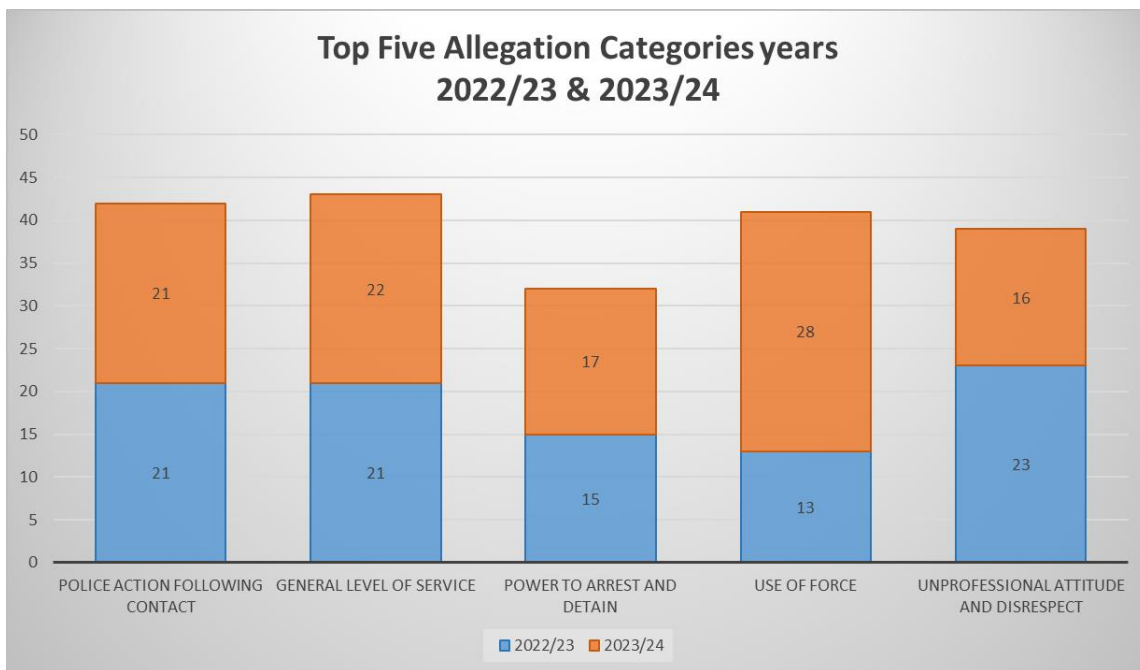
9. The data and trend narrative is shared across all directorates via the PSD SPOCs (Specified Points of Contact), within the PSD Working Group, and PSD membership in the Stop and Search Working Group to ensure that data and learning can be used to improve service delivery. Trends across complaints and 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.

Q3 – Data examination: -

10. Analysis of the highest allegation categories (the latest Q3 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 Q3 34% Organisational type allegations were recorded (Q2 = 33%)

11. The total number of allegations finalised during Q3 is 69 compared to 46 in the previous quarter.

12. Of the 69 allegations finalised:
- 34 Resolved
- 13 Service provided was acceptable
- 1 Not determined if the service acceptable
- 5 Service Not acceptable
- 11 Not resolved/No further action
- 2 No further action
- 3 Derecorded

13. The 5 allegations finalised where the Service provided was not acceptable relate to 5 cases. Each allegation was different and no theme was identified.

14. One case the allegation type of Police action following contact where a crime report was lost within the system causing delays. One case the allegation type of Stops & stop and search where the complainant was unhappy about the stop/search after calling police for assistance, the officers were referred to Reflective Practice. One case the allegation type of Handling of or damage to property where a crossbow had been seized and destroyed and the complainant had not been made aware of the process to collect the item. One case the allegation types Use of police vehicles, where the parking of police vehicles blocking the entrance to Victoria Ave was causing nuisance to residents of the flats in the same location. Learning has been cascaded. One case the allegation type of Impolite language and /or tone, where officers in the front counter were unhelpful in relation to an FOI request, the officers received Reflective Practice.

15. To note, cases often contain more than one allegation; the number of cases finalised in Q3 is 45, compared to 27 finalised in Q2.

16. Of the cases finalised 9 were logged as Schedule 3, and 36 were not under Schedule 3. There were no cases finalised under the previous regulations.

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

17. During this quarter, no new conduct investigations were recorded, and 1 case was finalised. There are currently 31 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.

18. 1 Conduct matter has been finalised: This case was de-recorded.

19. One accelerated Misconduct Hearing took place during Q3, the officer had resigned prior to proceedings but were found for Discreditable conduct and would have been dismissed had they not resigned. The officer has been placed onto the barred list.

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

20. Welfare Strategy: The new Welfare Strategy will be submitted for internal sign-off this month. Additionally, an implementation strategy is being developed with a training programme for all welfare officers, ensuring that those providing this critical function are trained and supported.

21. Professionalism Newsletter re-launch: The first version of the new format will be published this month, it will feature an update on the new Vetting APP, launch of the Welfare Strategy and key changes, such as amendments to the Chairing of Misconduct Hearings.

22. PSD Protect: A programme of PSD drop-in sessions have been established, with the first on 3rd February 2025. These sessions will provide employees, and in particular supervisors and line managers, an opportunity to discuss PSD matters where a formal submission is not required. This may be around seeking advice regarding emerging and/or more minor behaviours, or dealing with behaviours which may be more suited to a grievance or performance route rather than PSD.

Vetting:
23. Members were provided with a detailed separate report regarding Vetting service improvement within Q2 papers. Within that report, a detailed overview of performance was provided. This performance has continued to stabilise

across Q3, demonstrating that the resourcing, process improvements, better used of technology and upskilling of staff has sustained and is in line with our new operating model.

Furthermore;

24. The continuous improvement Action Plan for Vetting established in summer 2024 maintains to progress, with tangible improvements relating to productivity and service delivery. Currently, 56% of the 43 actions set have been completed, and 33% are in progress. All actions assessed as either 'very high' or 'high' in priority are part of the completed or in progress categories.

Overview of Action Plan

Actions	RAG Rating				Grand Total
	Very High	High	Medium	Low	
Number of Actions	3	21	16	5	45
% of Total	6%	47%	36%	11%	100%
Completed	1	15	7	2	25 (56%)
In Progress	2	5	6	2	15 (33%)
Not Started	-	-	2	1	3 (6%)
Rejected	-	1	1	-	2 (5%)

25. Since the summer 2024 vetting review, there has been a 96% reduction in the number of cases waiting to be allocated. All CoLP employees who required re-vetting have now had their vetting process completed. The vetting unit are working on a horizon forecast approach to re-vets, this will ensure that the demand is spread across the year and any surges (such as through police uplift cohorts requiring re-vets) can be anticipated and well planned for.

26. Continued training remains a focus for the team to support decision making and identification of risk, such as:

(i) *Force Vetting Decision-Making learning* package introduced as mandatory training and repeated annually. The learning outcomes are now included as part of the Vetting Officers annual PDR objectives, to increase professionalisation of practice and further develop skill profiles.

(ii) Capability development plan enacted to upskill the Vetting Service beyond mandatory NCALT packages which includes:

- Shadowing by Operational police officers to support the improvement of decision making and increase knowledge of offence types, relevancy & suitability.
- Input from Intelligence officers to provide instruction and examples of how to interpret and summarise intelligence logs.

II. Forward look

27. New Vetting Authorised Professional Practice (APP): In December 2024, the College of Policing published the new Vetting APP. The key themes are:

- Additional more robust standards to strengthen processes,

- Increased focus on vetting reviews to proactively identify any change in circumstances or information of concern.

- Introduction of one national vetting application form.

- Introduction of mandatory, randomised re-vetting.

- Greater emphasis on supervisory appraisals to support the wider protective security regime.

28. The vetting team are currently reviewing the APP to ensure that all of our current policies and procedures reflect the new changes. This is being complement by a communications strategy to ensure that all employees are aware of the key changes.

29. Appendix 3 of this report outlines a summary of the new Vetting APP and a future meeting of PSIC will receive a delivery plan for the City of London Police to meet the requirements.

30. Home Office Police Dismissals Review: Anticipated 'go live' date will be spring/summer 2025 with a focus on:

- - Presumption for dismissal when Gross Misconduct identified.

- - Accelerated hearings for former officers

- - Removal of vetting regulations and the holding of vetting to be made a statutory or regulatory requirement.

- - Performance regulations to be reformed.

City of London Complaint Data

Legend: CoLP Allegations Recorded/logged — CoLP Complaints Cases Logged

	2022/23				2023/24				2024/25		
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
CoLP Allegations Recorded/logged	34	37	30	64	56	69	68	60	44	43	70
CoLP Complaints Cases Logged	27	32	25	38	36	32	39	53	30	29	41
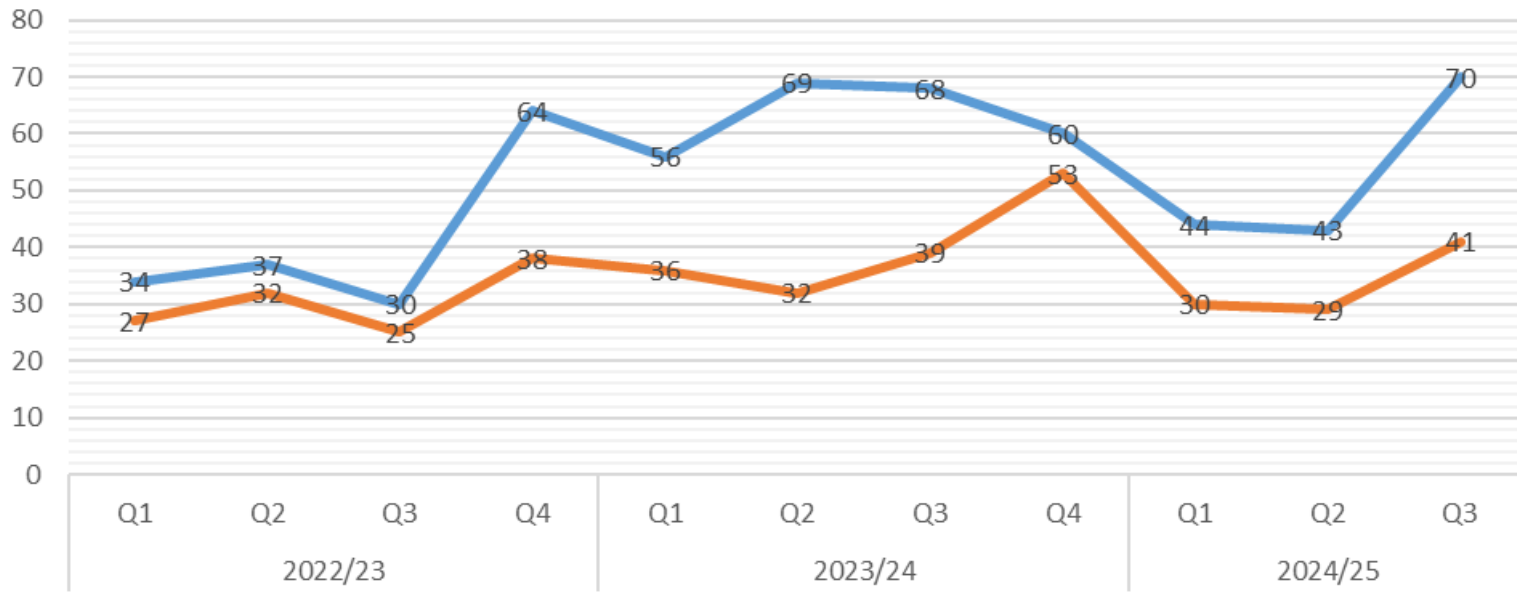
	Summary of public complaints data – Q3 2024/25					
Metric	**Current quarter (Q3)**	**Previous quarter (Q2)**	**Previous year (Q3)**	**(%) change (Q on Q)**	**(%) change (Y on Y)**	**Comment**
Complaints – Schedule 3	4	9	9	56%	56%	A total of 41 cases were logged in Q3 2024/25. This is a increase of 12 cases from Q2 2024/25
Complaints – not Schedule 3	37	20	30	85%	23%	The average number of cases logged over the previous 5 quarters is 38 per quarter, Q3 is above average.

Allegations	**70**	**43**	**68**	**63%**	**3%**	There were 70 allegations recorded in Q3 2024/25. This is an increase of 27 allegations from Q2 2024/25

The average number of allegations over the previous 5 quarters is 57 per quarter. Q3 is above average. |

Average time to log complaints (days)	**N/K**	**1**	**1**	**%**	**no change**	*Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.*
Average time to contact complainant (days)	**N/K**	**1**	**10**	**%**	**%**	
Complaints finalised – Schedule 3	**9**	**7**	**9**	**29%**	**0%**	
Complaints finalised - not Schedule 3	**36**	**20**	**24**	**80%**	**50%**	

Average time to finalise complaint cases (days) – Schedule 3 (NOT including subjudice cases)	**N/K**	**110 (Q2 YTD)**	**186 (Q3 2023/24 YTD)**	**%**	**%**	*Timeliness is taken from IOPC published bulletins and available retrospectively.*
Average time to finalise complaint cases (days) – not Schedule 3	**N/K**	**43**	**76**	**%**	**%**	*Q3 2024/25 is not yet published at time of writing*

Applications for review sent to local policing body	**N/K**	**1**	**1**	**%**	**%**	
Applications for review sent to IOPC	**N/K**	**1**	**5**	**%**	**%**	

Nature of allegations – Of the 70 allegations recorded during Q3 2024/25 the highest number were in the categories of Police Action following contact (16) Handling of/or damage to property (8) Use of Force (5) Bail, Identification & interview (5)

This is an increase in allegations recorded against Q2 of 27

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.

Q3 2024/25 contains 4 out of the above top allegation types. Use of Force returns to feature this quarter. Police action following contact remains the highest allegation category and equates for 23% of all allegations logged.

Ethnicity and discriminatory behaviour –
36% of complainant's ethnicity is recorded as Unknown and 16% complainants prefer not to say their ethnicity. 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. In order to improve on this self-declaration, CoLP remain working on a short questionnaire as mentioned in the Q2 report.

There were two allegations of Discriminatory Behaviour logged during this reporting period. (2 Race).

Summary of internal conduct cases and investigations– Q3 2024/25				
Metric	**Number**	**Previous quarter (Q2)**	**# (%) change (Q on Q)**	**Comment**
New conduct investigations recorded	0	7	100%	

Total live conduct investigations	31	36	14%	Total live cases of which a number are sub-judice
o.w. gross misconduct	25	25	0%	
Conduct investigations finalised	1	13	92%	Derecorded case
Investigations finalised within <30 days	0	1	100%	
Officers and staff on suspension	18	16	12%	
Officers and staff on restricted duties	5	7	29%	Includes officer under IOPC investigation
IOPC independent investigations	5	4	25%	Includes Westminster attack

Accelerated Misconduct Meetings held Q3

Case regards improper recording and dissemination of evidential material to unauthorised 3rd party.
AMH – Hearing took place on the on the 5th November 2024 where Cmsr O'Doherty found that had the officer been a serving officer he would have been dismissed. Former officer placed on the barred list.

	Misconduct meetings / hearings held Q3
	None held

Conclusion

31. In conclusion, the data presented highlights notable trends and developments within complaints, conduct investigations, and the progress of the Professional Standards Directorate (PSD) during Q3 2024/25. The 41% increase in complaint volumes reflects heightened public engagement or emerging service delivery concerns, with recurring allegation types like "Police action Following Contact" and "Use of Force" remaining key focus areas for improvement. Despite an absence of new conduct cases this quarter, ongoing sub-judice misconduct cases signal potential increases in misconduct hearings as legal proceedings conclude.

32. Operational enhancements, such as the sustained improvements in the vetting process and the proactive measures under the PSD "Protect" programme, demonstrate the organisation's commitment to addressing concerns efficiently and fostering a culture of professionalism.

33. Looking forward, the adoption of new national vetting standards and anticipated reforms under the Home Office Police Dismissals Review provide an opportunity for further aligning processes with evolving expectations. These initiatives coupled with targeted actions to address identified trends, will ensure continued improvements in service delivery, transparency and public trust.

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Appendices - Public

    Appendix 1 - Gifts and hospitality register

    Appendix 2 - Chief Officers Register of group memberships

Appendices - Non-Public

Appendix 3 – Vetting Authorised Professional Practice Summary **(NON-PUBLIC)**

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

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Item Type	Hospitality Item	Location type	Directorate	Date	Estimated Value	CoLP Participant(s)	External Organisation	Line Manager	Full description of Gift/Hospitality	Location details	Line Manager Comments	Rationale
Hospitality Item	Reception	Office premises (external organisation)	Chief Officer Team	19/12/2024	£ 25.00	Pete O'Doherty	City of London Crime Prevention Association	Nik Jethwa	City of London Crime Prevention Association Christmas drinks reception		Reviewed and approved.	Offered as part of role of Commissioner to attend stakeholder events.
Hospitality Item	Evening drinks and food - networking event	Office premises (external organisation)	Corporate Services	19/12/2024	£ 20.00	Patrick Holdaway	City of London Crime Prevention Association	Kate Lloyd	The CoL Crime Prevention Association hosted their Christmas Drinks event, which is attended by various CoL security leads and is a useful networking event.	Investec, 30 Gresham Street.		The event was attended by various CoLP colleagues including the Commissioner.
Gift Item	Box of chocolates	Emergency Services Premises	Local Policing	17/12/2024	£ 8.00	Christopher Wilson	Laser Tech UK	James Shelton	Box of Chocolates valued at £8-£15	Bishopsgate Police Station	This is an annual gift sent to police forces across the UK and of a very small value £8 approx.	A company we use to supply equipment has sent a corporate christmas card, along with a small box of chocolates as a festive gesture towards our department. They did
Hospitality Item	Carol Service followed by refreshments	Museum/Gallery/Cultural	Chief Officer Team	17/12/2024	£ 25.00	Pete O'Doherty	Mayor of London	Nik Jethwa	Mayor of London's Christmas Carol Service followed by refreshments.	Southwark Cathedral	Reviewed and approved	Offered as part of Commissioner role to network with Mayor of London office, declined due to annual leave.

Gift Item	Knife	Emergency Services Premises	Corporate Services	16/12/2024	£ 199.99	Patrick Holdaway	Sakuto Knives	Kate Lloyd	A cookery knife company approached us and asked us to host an article on our NBCC website about their knives, in return they would send us a Damascus Chef Knife. Our website hosts knife training for retailers.	All correspondenc e was online		The offer to host the web article as well as the knife was refused as it was neither appropriate nor relevant to our work
Hospitality Item	Drinks Reception	Guildhall/Mansi on House	Chief Officer Team	16/12/2024	£ 50.00	Umer Khan	Corporation of London	Nik Jethwa	Invited by Corporation of London to an early evening reception to celebrate Chanukah.	Guildhall		Attended as Chief Officer Team representative, to decline would be to cause offence.
Hospitality Item	Lunch	Livery Hall	Chief Officer Team	12/12/2024	£ 75.00	Pete O'Doherty	Lord Mayor's Aldermanic Envoy for Space Technology & Innovation	Nik Jethwa	City Livery Club Christmas Lunch, all Livery Clubs - Invite from Lord Mayor's Aldermanic Envoy for Space Technology &		Reviewed and approved.	Part of role of Commissioner to attend Livery functions, declined due to prior committment.
Hospitality Item	Luncheon	Government premises	Chief Officer Team	12/12/2024	£ 75.00	Pete O'Doherty	Alderman & Sheriff Gregory Jones KC	Nik Jethwa	Lunch to meet His Majesty's Judges and learn more about the work of the Central Criminal Court and the City of London.	The Central Criminal Court (Old Bailey)	Reviewed and approved	Offered as part of Commissioner role to network with City partners, accepted on that basis.

Hospitality Item	Festive Drinks	Government premises	Chief Officer Team	12/12/2024	£ 60.00	Nik Adams	RUSI	Pete O'Doherty	Festive Drinks - RUSI	61 Whitehall RUSI		To network and celebration joint working/festivities. Attended with Lucy Cumming.
Hospitality Item	Breakfast	Bar/Pub	Chief Officer Team	11/12/2024	£ 15.00	Nik Adams	TRM Labs	Nik Jethwa	Breakfast: Coffee & poached egg on toast.		Reviewed and approved.	Breakfast meeting hosted by TRM labs director who was visiting the UK. TRM labs are a contracted supplier to the NPCC Cyber Portfolio. Further work being explored between NPCC Cyber portfolio & TRM labs as part of workforce strategy and developing specialist skills.
Hospitality Item	Dinner	Museum/Gallery/Cultural	Chief Officer Team	09/12/2024	£ 100.00	Pete O'Doherty	City of London Corporation	Nik Jethwa	Licensing Committee dinner	Honourable Artillery Company	Reviewed and approved.	Offered as part of Commissioner role to attend Corporation functions, accepted on that basis.
Hospitality Item	Dinner	Civic building	Chief Officer Team	09/12/2024	£ 125.00	Umer Khan	Chairman of Licencing Committee	Nik Jethwa	Invited by Chairman of Licencing Committee to attend a dinner.	The Honourable Artillery Company, Armoury House, City Road, London EC1Y		Attended in place of Commissioner, representing Chief Officer Team, to decline would be to cause offence.

Hospitality Item	BPSO Symphony Hall Concert	Concert hall/arena/cinema	Chief Officer Team	07/12/2024	£ 200.00	Nik Adams	BPSO	Pete O'Doherty	BPSO Symphony Hall Concert - Invited in capacity as Trustee	Birmingham Symphony Hall		In capacity as Trustee of BPSO - Invited by Chief Constable Craig Guildford (Chair of Trustees of the British Police Symphony Orchestra (BPSO)
Gift Item	Goodie bag at a conference	Hotel	Corporate Services	06/12/2024	£ 30.00	Patrick Holdaway	UK Revenue Protection Association	Alix Newbold	Whlist presenting a confernce the orgainsers gave me 'goodie bag' which was going to be given to all attendees. The bag contained a water	Ashorne Hill Conference Centre, Leamington Spa		I tried to decline but the orgainser was insistent.
Hospitality Item	Lunch	Office premises (external organisation)	Corporate Services	05/12/2024	£ 20.00	Patrick Holdaway	CityForum	Kate Lloyd	A hot buffet lunch at a conference on international private security. I suport the NPCC lead for private security liaison and presented at the conference.	The Institution of Engineering and Technology (IET), 2 Savoy Place, London WC2R 0BL		I was there all day for the confernce.
Hospitality Item	Meal	Restaurant	Corporate Services	04/12/2024	£ 100.00	Patrick Holdaway	CityForum	Kate Lloyd	CityForum run a series of events whihc include an evenng meal followed by a conference the day after. The offer is for the evening	The Liberal Club		My national work involves enagement with the private security sector.
Hospitality Item	Meal	Livery Hall	Corporate Services	04/12/2024	£ 75.00	Patrick Holdaway	CityForum	Kate Lloyd	The offer of a dinner with guests whicc preceeded a conference the following day. The event was on international private security, I	The National Liberal Club, Whitehall Place, London.		The event was related to my national role and was a networking event prior to the conference the following day where I was presenting.

Hospitality Item	Reception	Foreign embassy	Chief Officer Team	04/12/2024	£ 25.00	Pete O'Doherty	Ambassador of Brazil	Nik Jethwa	Reception to bid farewell to the outgoing Brazilian Police Attache and welcome to the incoming one.	Embassy of Brazil	Reviewed and approved	Offered as part of Commissioner role to network with foreign dignaturies, declined due to prior committment.
Hospitality Item	Lunch	Guildhall/Mansion House	Chief Officer Team	04/12/2024	£ 50.00	Paul Betts	Corporation of London	Nik Jethwa	Lunch offered by Police Authority Board after monthly PAB meeting.	Guildhall	Reviewed and approved.	Lunch offered by the Police Authority Board to PAB members every month. Unless an operational meeting is to be attended after PAB, to decline could cause offence.
Hospitality Item	Buffet lunch	Government premises	Corporate Services	03/12/2024	£ 15.00	Patrick Holdaway	Carlisle Suport Services	Kate Lloyd	I was there for the meeting with senior security leads and supporting ACC Gilmer to discuss the future of police and private security	The Supreme Court, Parliament Square London SW1P 3BD		Buffet lunch was served after the meeting for networking.
Hospitality Item	Coffee	Restaurant	Chief Officer Team	03/12/2024	£ 4.00	Pete O'Doherty	Club members at the business meeting.	Nik Jethwa	One coffee accepted at a business meeting.	The Walbrook Club	Reviewed and approved	Offered at a business meeting to discuss Cyber-Crime, accepted as a reasonable refreshment at a meeting.
Hospitality Item	Reception	Government premises	Chief Officer Team	02/12/2024	£ 50.00	Nik Adams	APPG	Pete O'Doherty	Reception on 'AI and the Future Fraud Threat', organised by the All Party Parliamentary Groups on Anti-Corruption &	Palace of Westminster		ATTENDED

Hospitality Item	Charity Lunch	Museum/Gallery/Cultural	Specialist Operations	29/11/2024	£ 80.00	Thomas Hayball	Andy Baum	Michael Dodge	Charity Lunch for DS HAYBALL, PC BELL and PC SPARKES. This is a 3 course sit down lunch followed by a fundraising raffle		supported. the participants have sought advice from PSD to ensure compliance with policy.	Invited named officers to the fundraiser provides an opportunity for the officers to network with other colleagues who work in a similar field and also liaise with other suppliers. It also acts as a good fundraiser for a notble charity with the officers will contirbute to themselves.
Gift Item	N/A	Restaurant	Professionalism and Trust	29/11/2024	£ 50.00	Hannah Sydney	Kirsty Richardson (former DC in CoLP)	Joanne Eales	Silver bangle	N/A		I carried out the role of welfare officer for the person who gifted the item. They are no longer in the force or employed by any police force. the gift was a thank you for the
Hospitality Item	Reception	Museum/Gallery/Cultural	Chief Officer Team	28/11/2024	£ 25.00	Pete O'Doherty	The Barbican	Nik Jethwa	Barbican and the City of London Corporation small informal event to thank Claire Spencer, former CEO, for her service to the		Reviewed and approved.	Offered as part of role of Commissioner to attend events with City partners, declined due to pior committment.
Hospitality Item	Christmas meal	Bar/Pub	Corporate Services	27/11/2024	£ 50.00	Patrick Holdaway	Fitzrovia BID	Kate Lloyd	Christmas meal following a meeting by teh Fitzrovia BID (London).	West End		I am a board member of the Fitzrovia BID so invited me along. I kindly declined the offer.

Hospitality Item	Banquet	Guildhall/Mansi on House	Chief Officer Team	27/11/2024	£ 100.00	Pete O'Doherty	City of London Corporation and the Royal Commonwealth Society	Nik Jethwa	High Commissioners Banquet brings together the Commonwealth Diplomatic Community in London and senior		Reviewed and approved.	Part of Commissioner role to attend such functions, accepted on that basis.
Hospitality Item	Dinner	Museum/Galler y/Cultural	Chief Officer Team	26/11/2024	£ 100.00	Pete O'Doherty	The Police Arboretum Memorial Trust	Nik Jethwa	Dinner hosted by BT on behalf of the Police Arboretum Memorial Trust Charity to update stakeholders on the UK Police Memorial project.	BT Tower	Reviewed and approved.	Offered as part of Commissioner role to attend Police memorial events, declined due to short notice/ prior committment.
Hospitality Item	Breakfast	Restaurant	Corporate Services	25/11/2024	£ 20.00	Patrick Holdaway	Toe Su Aung and Sharon Penketh - who work for Proctor & Gamble	Kate Lloyd	Breakfast meeting to discuss retail crime with colleagues from an external company.	Dishoom Kings Cross 5 Stable St, London N1C 4AB		The organisers arranged the meeting at the restaurant as it suited their needs (they are based outside of London) and it provided a good opportunity to highlight our work at
Hospitality Item	Dinner	Livery Hall	Chief Officer Team	20/11/2024	£ 100.00	Pete O'Doherty	The Worshipful Company of Stationers and Newspaper Makers	Nik Jethwa	Stationers' Civic Dinner - The Worshipful Company of Stationers and Newspaper Makers		Reviewed and approved.	Offered as part of Commissioner role to attend Livery functions, declined due to a prior committment.
Gift Item	Bottle of Jameson's alcohol	Experience event	Specialist Operations	17/11/2024	£ 30.00	Samuel Lowe	Sergeant Tracy Haggart - New Zealand Police	Ben Pereira	1 litre bottle of Jameson's Alcohol gifted by a New Zealand police officer following off-duty tour of police stables. Organised as part of	Met with New Zealand Police in Westminster and conducted walking tour including visiting police stables. Bottle		Bottle offered as thank you in public street away from Police Premises at end of walking tour.

Hospitality Item	Dinner & Awards Ceremony	Hotel	Chief Officer Team	15/11/2024	£ 100.00	Andrew Gould	World Excellence Awards	Nik Adams	TECAS Awards Dinner	Novotel West,-London		Asked to attend on behalf of Commissioner - Nik Adams declined, Invite accepted by T/Cmdr Andrew Gould
Hospitality Item	Dinner	Guildhall/Mansion House	Chief Officer Team	14/11/2024	£ 100.00	Pete O'Doherty	The Lord Mayor	Nik Jethwa	The Financial and Professional Services Dinner		Reviewed and approved.	Offered as part of Commissioner role to attend Lord Mayor/ stakeholder events, accepted on that basis.
Hospitality Item	Breakfast	Guildhall/Mansion House	Chief Officer Team	13/11/2024	£ 10.00	Pete O'Doherty	City of London Chamber	Nik Jethwa	City of London Chamber Business Event followed by a light breakfast		Reviewed and approved.	Offered as part of Commissioner role to attend stakeholder events, declined due to prior committment.
Hospitality Item	Reception and exhibition	Museum/Gallery/Cultural	Chief Officer Team	13/11/2024	£ 40.00	Pete O'Doherty	City of London Corporation	Nik Jethwa	Early Evening Reception and Exhibition Private View to mark Diwali.		Reviewed and approved.	Offered as part of Commissioner role to attend Corporation events, declined due to annual leave.
Hospitality Item	Lunch	Guildhall/Mansion House	Chief Officer Team	09/11/2024	£ 25.00	Pete O'Doherty	Lord Mayor's office	Nik Jethwa	Return Procession of the Lord Mayor's Show followed by lunch.		Reviewed and approved.	Offered as part of Commissioner role to attend and participate in the Lord Mayor's Show, accepted on that basis.

Hospitality Item	Awards and dinner	Livery Hall	Chief Officer Team	07/11/2024	£ 100.00	Pete O'Doherty	NPCC		Nik Jethwa	National Covert Policing Awards and dinner		Reviewed and approved.	Offered as part of role of Commissioner to attend National Policing events, declined due to prior committment.
Hospitality Item	Awards ceremony and dinner	Livery Hall	Chief Officer Team	07/11/2024	£ 150.00	Paul Betts	NPCC		Nik Jethwa	Invited to the National Covert Policing Awards ceremony and dinner.	Grocers Hall, Princes Street, EC2	Reviewed and approved.	Attended in place of Commissioner who was unavailable, CoLP had officers nominated on the night, to decline would cause offence and show lack of support for our officers.
Hospitality Item	Dinner & Awards Ceremony	Livery Hall	Chief Officer Team	07/11/2024	£ 100.00	Nik Adams	NPCC		Pete O'Doherty	National Covert Policing Awards 2024 - DECLINED (Event attended by AC Paul Betts)	Grocer's Hall		Recognition event/support to collegagues being awarded/nominated
Hospitality Item	Dinner	Concert hall/arena/cinema	Chief Officer Team	06/11/2024	£ 100.00	Pete O'Doherty	National Crime Agency		Nik Jethwa	Gala Dinner for the 92nd INTERPOL General Assembly		Reviewed and approved.	Offered as part of Commissioner role to attend stakeholder events, declined due to prior committment.
Hospitality Item	Dinner	Hotel	Chief Officer Team	05/11/2024	£ 100.00	Pete O'Doherty	CrimeStoppers		Nik Jethwa	Crimestoppers Annual Dinner 2024		Reviewed and approved.	Offered as part of Commissioner role to attend stakeholder events, declined due to prior committment.

Gift Item	Arabic Sweets	Civic building	National Lead Force Operations	04/11/2024	£	20.00	Michelle Schlichter	Ghinwa SYED	Philip Corcoran	Arabic sweets (Baclava) of Patchi 28 Abbey Road.	Front Dest Bishopsgate		Wife explained to me it is in their culture to provide gifts and because I was empathetic and kind towards her she wanted to express her gratitude.
Hospitality Item	Reception	Guildhall/Mansion House	Chief Officer Team	31/10/2024	£	25.00	Pete O'Doherty	Lady Mayoress office	Nik Jethwa	At home with the Lady Mayoress reception		Reviewed and approved.	Offered as part of Commissioner role to attend Lord/ Lady Mayoress events, declined due to prior committment.
Hospitality Item	Reception	Foreign embassy	Chief Officer Team	31/10/2024	£	30.00	Nik Adams	Australian Federal Police	Pete O'Doherty	Australian Federal Police Annual Liasion Function	Australian High Commission, Australia House, London WC2B 4LA		Networking opportunity - Declined
Hospitality Item	Dinner	Civic building	Chief Officer Team	31/10/2024	£	100.00	Nik Adams	Ministry of Defence	Pete O'Doherty	Defence Employer Recognition Scheme Gold Dinner and Awards Ceremony	Armoury House, The Honourable Artillery Company, City Rd, London, EC1Y 2BQ		Invited in capacity as CoLP lead for Arned Forces - ACCEPTED
Hospitality Item	Dinner	Guildhall/Mansion House	Chief Officer Team	29/10/2024	£	100.00	Pete O'Doherty	Lord Mayor's office	Nik Jethwa	Lighting Up Dinner to meet the Lord Mayor Elect and the Sheriffs		Reviewed and approved.	Offered as part of Commissioner role to attend new Lord Mayor events, declined due to prior committment.

Hospitality Item	Dinner	Guildhall/Mansion House	Chief Officer Team	29/10/2024	£ 125.00	Umer Khan	Lord Mayor and Sheriffs' office	Nik Jethwa	Invited by Lord Mayor Elect and Sheriffs to the Lighting Up Dinner.	Guildhall		Attended as COT representative, to decline would be to cause offence.
Gift Item	Flowers	Civic building	National Lead Force Operations	28/10/2024	£ 4.00	Michelle Schlichter	Arif Syed	Philip Corcoran	Mixed Chrysanthemum flowers from Co-op. Price tag still attached £4	BISHOPSGATE Front Desk		I work for IFED and had a job where an insurance company alleged that a suspect committed fraud. During the investigation, the suspect suffered
Hospitality Item	Dinner	Livery Hall	Chief Officer Team	28/10/2024	£ 100.00	Pete O'Doherty	The Worshipful Company of Blacksmiths	Nik Jethwa	Lord Mayor-Elect's Presentation Dinner		Reviewed and approved.	Offered as part of Commissioner role to attend annual new Lord Mayor events, accepted on that basis.
Hospitality Item	Dinner	Restaurant	Chief Officer Team	28/10/2024	£ 150.00	Umer Khan	NPCC	Nik Jethwa	Invited by NPCC DAC to a Peer Support Working Dinner.	Blue Boar Restaurant, 45 Tothill St, London SW1H	Reviewed and approved.	Attended as CoLP representative, alongside colleagues/peers from other forces of the same ranks. To decline would be to cause offence.
Hospitality Item	Reception and dinner	Bar/Pub	Chief Officer Team	27/10/2024	£ 100.00	Pete O'Doherty	MPS Federation	Nik Jethwa	The RUC George Cross and PSNI Widows and Mothers Association Riverboat Event	Riverboat	Reviewed and approved.	Offered as part of role of Commissioner to attend functions in support of other forces. Declined due to a prior committment.

Hospitality Item	Dinner	Guildhall/Mansion House	Chief Officer Team	25/10/2024	£ 100.00	Nik Adams	City of London Police Special Constabulary	Pete O'Doherty	City of London Police Reserve Officers' Dinner	Mansion House		To celebrate the work and achievements of CoLP Special Constabulary - ATTENDED
Hospitality Item	Dinner Reception	Museum/Gallery/Cultural	Chief Officer Team	24/10/2024	£ 30.00	Chris Bell	ITSM	Nik Adams	Dinner served at ITSM Summit	Arboretum - 2A Charing Cross Rd, London WC2H 0HF		Attending on behalf of Chief Officer Team
Hospitality Item	Reception	Government premises	Chief Officer Team	23/10/2024	£ 30.00	Nik Adams	The Lord Mountevans	Pete O'Doherty	Parliamentary Terrace Reception - to attend on behalf of Commissioner	Terrace Pavilion, House of Commons		Networking - DECLINED
Hospitality Item	Reception	Office premises (external organisation)	Chief Officer Team	17/10/2024	£ 25.00	Pete O'Doherty	Chairman, City of London Chamber of Commerce	Nik Jethwa	City of London Chamber Autumn Reception	Lloyds Bank	Reviewed and approved.	Offered as part of Commissioner role to engage with partners/ Lord Mayor events, declined due to prior committment.
Hospitality Item	Dinner	Guildhall/Mansion House	Chief Officer Team	17/10/2024	£ 100.00	Nik Adams	The Lord Mayor and The Lady Mayoress Alderman Professor Michael and Mrs Elisabeth Mainelli	Pete O'Doherty	** DECLINED ** The Lord Mayor and The Lady Mayoress Alderman Professor Michael and Mrs Elisabeth Mainelli	Mansion House		Networking opportunity, Declined due to availability.

Hospitality Item	Dinner	Hotel	Chief Officer Team	15/10/2024	£	100.00	Pete O'Doherty	The Cross-sector Safety & Security Communications partnership	Nik Jethwa	Annual Charity Dinner in partnership with The City of London Police Charity for Children known as 'City Kids'		Reviewed and approved.	Offered as part of Commissioner role to attend stakeholder functions, accepted on that basis.
Hospitality Item	Reception	Livery Hall	Chief Officer Team	15/10/2024	£	25.00	Pete O'Doherty	Chair of the Digital Services Committee	Nik Jethwa	Digital Services Committee reception		Reviewed and approved.	Offered as part of Commissioner role to attend Corporation functions, declined due to prior committment.
Hospitality Item	Dinner Reception	Civic building	Chief Officer Team	15/10/2024	£	30.00	Chris Bell	City of London Corporation	Nik Adams	Dinner as part of Digital Services Committee reception	Salters' Hall, 4 London Wall Place, London EC2Y 5DE		Attended as Chief Officer lead for digital services
Gift Item	Spare gift bags given to protection officers at end of event	Museum/Gallery/Cultural	Local Policing	14/10/2024	£	15.00	David Jarvis	Senior Supervisor	Kevin Thomas	Bag containing air freshener, note pad and tea bags.	St Pauls Cathedral	discussed with officers. AIO	Gift bags containing memorabilia were availble to all persons attending the event. At the end of the night CP officers were given a spare bag each (4 in total) as a thankyou for their protection at the event

Gift Item	Chocolates	Guildhall/Mansion House	Local Policing	14/10/2024	£ 50.00	Alison Harle	Bray Leino Events	Martin Hopkins	5x boxes of Italian chocolates received as a thank you from Bray Leino Events for the co-ordination of the Global Investment Summit held at Guildhall.	Guildhall	I approve the acceptance of this gift and agree that any refusal could amount to a snub towards Bray Leino.	Received as a thank you for the work undertaken on the Global Investment Summit to be distributed to Cmdr KHAN, Alison HARLE, Sarah SMALLWOOD, Craig MULLISH and Lisa CRONIN. To decline could cause offence and possibly sour further working relationship.
Hospitality Item	Dinner	Guildhall/Mansion House	Chief Officer Team	14/10/2024	£ 125.00	Umer Khan	Lord Mayor's office	Nik Jethwa	Invited by Lord Mayor to attend the Defence & Security Lecture followed by a private dinner.	Mansion House		Attended as Chief Officer Team representative and as not only Cmdr for Ops & Security in the City but as National Lead fo Project Servator.
Hospitality Item	Lord Mayor's Music Competition and buffet lunch	Guildhall/Mansion House	Chief Officer Team	13/10/2024	£ 25.00	Pete O'Doherty	City of London Corporation	Nik Jethwa	Lord Mayor's Music Competition 2024 - Young cadet forces throughout London are battling it out at the 5th annual Lord Mayor's Music Competition.		Reviewed and approved.	Offered as part of Commissioner role to attend Corporation events, declined due to private committment.
Hospitality Item	Complimentary pass at a Blue Light Partnership network	Hotel	Corporate Services	10/10/2024	£ 50.00	Patrick Holdaway	PNE-UK	Alix Newbold	Complimentary pass at a Blue Light Partnership network, which includes meals etc.	DoubleTree Hilton, London		Refused. The agenda does not influnec my area of work so there was no value in attending.

Hospitality Item	Meal	Restaurant	Corporate Services	09/10/2024	£ 75.00	Patrick Holdaway	CEOs of Mities and Carlisle Support Services	Alix Newbold	Two senior business leaders would like to take me for a meal to discuss the futre of private security.	London - TBC		Accepted. Various attempts have been made to meet during the day but diary commitments didn't allow it, therefore it was suggested that we meet for an event meal. I am not a deciosn maker in thsiarea although can offer an opinion. The meeting doesn't cause any conflict of interest.
	Dinner	Civic building	Specialist Operations	03/10/2024	£ 50.00	Sarah Smallwood	Corporation of London	Mark Folan	Lighting Up Dinner	Guildhall		
Hospitality Item	Reception	Civic building	Chief Officer Team	02/10/2024	£ 25.00	Pete O'Doherty	City of London Corporation	Nik Jethwa	Early evening reception for the Central London Bench		Reviewed and approved.	Part of role of Commissioner to attend Corporation events, declined due to prior committment.
Hospitality Item	Lunch	Guildhall/Mansion House	Chief Officer Team	02/10/2024	£ 50.00	Paul Betts	Corporation of London/Police Authority Board	Nik Jethwa	Lunch offered by Police Authority Board after the meeting held, same every month.	Guildhall	Reviewed and approved.	Unless an operational meeting is scheduled after PAB that needs attendance, to decline could cause offence.

	Drinks reception	Civic building	Chief Officer Team	02/10/2024	£	75.00	Paul Betts	Corporation of London	Nik Jethwa	Invited by CoL to attend Central London Bench at the Old Bailey	Central Criminal Court, Old Bailey		
Hospitality Item	Lunch	Guildhall/Mansion House	Chief Officer Team	02/10/2024	£	50.00	Umer Khan	Remembrancers Office, Corporation of London	Nik Jethwa	Invited by Remembrancer's office to Lord Mayor & Sheriffs Committee meeting to report on arrangments for Lord Mayors Show	Guildhall		Attended as Cmdr Khan was Gold Command for Lord Mayors Show and need to attend to update committee on plans.
Hospitality Item	Lunch	Restaurant	Corporate Services	01/10/2024	£	50.00	Sanjay Andersen	Carrollanne Lindley, Chair of the IASG	Paul Betts	Invitation to ceremony and lunch by the Chair of the IASG to celebrate her being awarded the Freedom of the City.	Cafe du Marche, 22 Charterhouse Square, EC21M 6DX		Invited to ceremony and lunch in recognition of the positive relationship and support provided by P&T since taking up her role as Chair of the IASG.

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.

Ref no	Date logged	Rank	Officer declaring	External Organisation	Role/Position held
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	Deputy Commissioner	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	Deputy Commissioner	Paul Betts	Negative / No Organisations	N/A
17	10/09/2024	Commander	Umer Khan	Negative / No Organisations	N/A

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