



Professional Standards & Integrity (Police) Committee

Date: TUESDAY, 3 JUNE 2025

Time: 11.00 am

Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members:	Michael Mitchell (Chair)	Deborah Oliver
	Tijs Broeke	Joanna Tufuo Abeyie
	Melissa Collett	Florence Keelson-Anfu
	Alderman Professor Emma Edhem	Naresh Hari Sonpar
	Jason Groves	Jacqui Webster

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**

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

3. **TO ELECT A DEPUTY CHAIR**

To elect a Deputy Chair in accordance with Standing Order 26 (6).

For Decision

4. **MINUTES**

To agree the public minutes and summary of the meeting held on 6 February 2025.

For Decision
(Pages 5 - 8)

5. **PUBLIC OUTSTANDING REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 9 - 10)

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

Report of the Commissioner.

For Information
(Pages 11 - 56)

7. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q4**

Report of the Commissioner.

For Information
(Pages 57 - 76)

8. **SUMMARY OF ACTION FRAUD PUBLIC COMPLAINTS DATA - Q4 2024/25**

Report of the Commissioner.

For Information
(Pages 77 - 82)

9. **STOP & SEARCH AND USE OF FORCE DATA - QUARTER 4 2024/25**

Report of the Commissioner.

For Information
(Pages 83 - 90)

10. **STOP & SEARCH AND USE OF FORCE DATA - APRIL 2024- MARCH 2025**

Report of the Commissioner.

For Information
(Pages 91 - 98)

11. **ANNUAL REVIEW OF POLICE COMPLAINTS ACTIVITY - 2023/24**

Report of the Town Clerk.

For Information
(Pages 99 - 118)

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

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

14. **EXCLUSION OF THE PUBLIC**

MOTION – that under Section 100 (A) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

For Decision

15. **NON-PUBLIC MINUTES**

To approve the non-public minutes of the meeting held on 6 February 2025.

For Decision
(Pages 119 - 120)

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

Report of the Commissioner. To be read in conjunction with item 7.

For Information
(Pages 121 - 126)

17. **CITY OF LONDON POLICE 2025 FULL STAFF SURVEY RESULTS**

Report of the Commissioner.

For Information
(Pages 127 - 158)

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

Report of the Commissioner.

For Information
(Pages 159 - 168)

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

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

PROFESSIONAL STANDARDS & INTEGRITY (POLICE) COMMITTEE Thursday, 6 February 2025

Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Thursday, 6 February 2025 at 11.00 am

Present

Members:

Michael Mitchell (Chair)
Deputy James Thomson CBE
Jason Groves
Deputy Madush Gupta
Jacqui Webster

Officers:

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

City of London Police:

Paul Betts	- City of London Police
Sanjay Anderson	- City of London Police
Jesse Wynne	- City of London Police
Carly Humphries	- City of London Police
Kate MacLeod	- City of London Police
Olivia Hogman	- City of London Police

1. APOLOGIES

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

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

There were no declarations.

3. MINUTES

RESOLVED, - that the public minutes and non-public summary of the meeting held on 25 November 2024 were approved as an accurate record.

4. PUBLIC OUTSTANDING REFERENCES

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

RESOLVED, - that the report be noted.

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

Members received a report of the Commissioner which provided an annual review of stop and search in 2024.

Members queried the expected outcome of this area in the upcoming HMICFRS PEEL inspection. Officers considered that the City Police was in an improved place compared to the last inspection: outcomes were good; disproportionality figures were heading in the right direction; and external scrutiny was now robust.

RESOLVED, - that the report be noted.

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

Members received a report of the Commissioner which provided an update of stop and search and use of force in the third quarter of 2024.

Members queried if City police officers were given performance targets around these powers. Officers clarified that there were no targets set. Each case would be scrutinised, and it was considered that the positive outcome rates for the City Police evidenced the appropriate use of the power.

The Chair felt it would be useful for Members to have more detail around the use of stop and search and force with each report, officers agreed to provide case studies in future reporting.

RESOLVED, - that the report be noted.

7. **EQUITY DIVERSITY AND INCLUSIVITY UPDATE**

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

Members noted significant activity in this area of work, which incorporated previous Member comments.

Members queried if this work was adequately resourced, officers assured Members that this team was almost at full strength in terms of staffing.

The Chair requested that future reports on the implementation of the City Police's EDI Strategy should include milestones, baseline data and key measurements, to allow for effective scrutiny progress.

RESOLVED, - that the report be noted.

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

Members received a report of the Commissioner which provided a summary of Action Fraud complaints data from Q3 2024-2025.

RESOLVED, - that the report be noted.

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

Members received a report of the Commissioner which provided an update of professional standards, conduct, and vetting of the third quarter of 2024.

Members noted the progress achieved in managing the significant backlog in vetting cases to be completed and the reduction in waiting times for cases to be progressed

RESOLVED, - that the report be noted.

10. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions.
11. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
There was no other business.
12. **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.
13. **NON-PUBLIC MINUTES**
RESOLVED, - that the non-public minutes of the meeting held on 25 November 2024 were approved as an accurate record.
14. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE NON-PUBLIC APPENDICES**
Members received a report of the Commissioner which provided the non-public appendices to the professional standards, conduct and vetting update.
15. **UPDATE ON TEAM CULTURAL AUDIT PILOT**
Members received a report of the Commissioner which provided an update on the team cultural audit pilot.
16. **POLICE CONDUCT REVIEWS - RANDOM SAMPLE**
Members received a report of the Commissioner which provided a random sample of police conduct reviews.
17. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions.
18. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There was no other business.

The meeting ended at 12:55

Chairman

Contact Officer: Kezia.Barrass

Kezia.Barrass@cityoflondon.gov.uk

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

City of London Corporation Committee Report

Committee(s): Professional Standards and Integrity Committee – For information Police Authority Board – For Information	Dated: 3 rd June 2025 23 rd July 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

1. With a clear EDI Performance Framework and Implementation Plan in place, the ICOD (Inclusivity, Culture and Organisational Development) Team are in a better position to report on our progress against our Strategy. Of the 76 actions we have committed to complete over the next three years, 28 of these will form our priorities for years 2025/26. As of this quarter, 14% (4) of these actions have been completed, 72% (20) are in progress and 14% (4) have not yet been started.
2. The 'Our People' strand remains the most advanced due to the current national scrutiny on behaviour and culture within Policing. We will be building on this work next quarter, progressing actions on evaluation of our leadership schemes for under-represented groups, improving our capture of diversity data, delivery of our cultural audits and establishment of an Ethics Committee. We also plan to progress some actions under the 'Our Public' pillar to help balance delivery, formalising our workplan for the youth IASG (Independent Advisory Scrutiny Group) and reviewing all National EDI plans alongside our local engagement activity.
3. The key successes for this quarter include finalising our priorities and thematics for 2025/26, continuing to roll out our Inclusivity Programme and progressing various initiatives on leadership and culture. Our biggest risk to delivery remains team capacity verses demand, we have outlined our requirement for dedicated

analytical support to mitigate this, which has been acknowledged and accepted by the Chief Officer Team. We have also recently filled our Organisational Development (OD) Practitioner vacancy to ensure this team is at full strength.

4. Operating within this space, we acknowledge that we will need to adapt and flex our plans based on new trends and a changing political landscape. An example of this has been seen in recent weeks, where the Supreme Court Ruling relating to the legal definition of a 'woman' has required us to respond quickly, but with due consideration to our colleagues and our communities.

Recommendation(s)

Members are asked to:

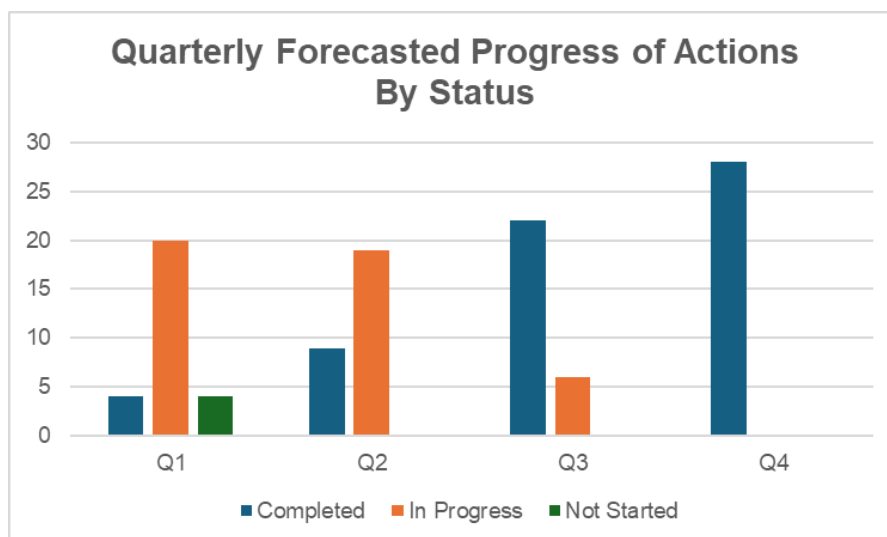
- Note contents of this report

2025-26 prioritisation

5. Since our last Committee meeting, Member feedback has been considered and our ambitions reviewed accordingly. Our full EDI Strategy now totals 76 actions across the four priority pillars, 28 (37%) of these have been prioritised for delivery in 2025/26. Of the remaining actions, 18 (24%) of these are medium priority with 30 (39%) low priority. This grading has since been signed off by our Chief Officer Team and at our internal EDI Strategic Board, the full paper can be found at Appendix 1.
6. The large majority 18 (64%) of our 2025/26 actions are under the 'Our People' pillar and focus on improving diversity of under-represented talent and rolling out mandatory EDI education and training initiatives, alongside inclusion of EDI as part of Professional Development Review (PDR) objectives for all colleagues, and more generally ensuring our ambitions are fully understood by our Senior Leadership Team. We also continue to work across force to deliver cultural audits, developing this approach further is also a high EDI Strategy priority for 2025/26.

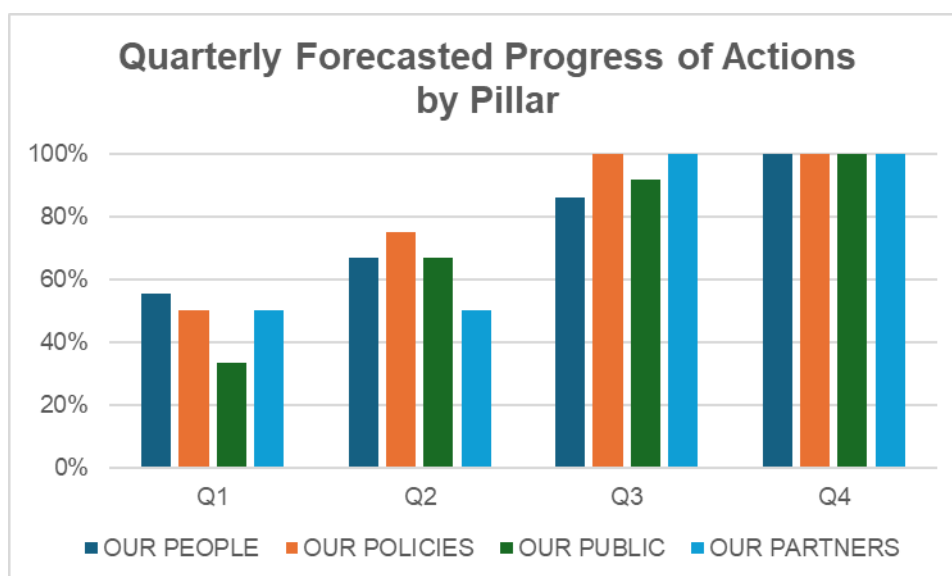
Delivery overview this quarter

Actions status	Q1 (Actual)	Q2 (Forecast)	Q3 (Forecast)	Q4 (Forecast)
<i>Completed</i>	4	9	22	28
<i>In progress</i>	20	19	6	0
<i>Not started</i>	4	0	0	0



7. The following progress is calculated using a weighted average of 'Completed' actions (with a weighting of 1) and 'In progress' actions (with a weighting of 0.5) out of the total number of actions per pillar. A forecast of progress has been calculated using the same methodology for Q2 to Q4.

Progress by Pillar	Q1 (Actual)	Q2 (Forecast)	Q3 (Forecast)	Q4 (Forecast)
<i>Our People</i>	56% (18 total actions: 3 completed, 14 in progress, 1 not yet started)	67% (18 total actions: 6 completed, 12 in progress)	86% (18 total actions: 13 completed, 5 in progress)	100% (18 actions, all completed)
<i>Our Policies</i>	50% (2 total actions: 1 completed, 1 not yet started)	75% (2 total actions: 1 completed, 1 in progress)	100% (2 total actions: 2 completed)	100% (2 actions, all completed)
<i>Our Public</i>	33% (6 total actions: 0 completed, 4 in progress, 2 not yet started)	67% (6 total actions: 2 completed, 4 in progress)	92% (6 total actions: 5 completed, 1 in progress)	100% (6 actions, all completed)
<i>Our Partners</i>	50% (2 total actions: 2 in progress)	50% (2 total actions: 2 in progress)	100% (2 total actions: 2 completed)	100% (2 actions, all completed)



Key successes and issues

2025/26 actions completed this quarter	Summary of results and impact
2.7 Creation of Retention and Exiting Workgroup (with programme of work in place)	<i>Relates to feedback from Inclusive Employers around capturing why people are leaving / staying. In place with reporting lines.</i>
3.1 Creation of 'Inclusivity Programme' as mandatory for all	<i>Was already in place, work now focuses on evaluating impact and compliance.</i>
3.2 Creation of EDI calendar to inform activity	<i>Completed for 25/26 in line with Nationally significant dates. Allows for effective planning and proactive identification of relevant themes.</i>
11.1 Review of Staff Networks and Associations	<i>Review completed, 6 months trial of recording network working hours underway to inform next steps.</i>
2025/26 actions not yet started this quarter	Summary of issues with commencing
3.3 Review of internal approach to engagement and creation of strategy (including intranet revamp)	<i>Awaiting second OD employee to help with the engagement strategy. This should be commenced next quarter</i>
11.6 Review of Equal Opportunities Policy	<i>SOP's all awaiting HR overview. We will then commence</i>
15.1 A review to take place of all National plans to ensure adequate capture.	<i>Only issue has been capacity – should commence next quarter.</i>
15.2 Clear ownership and reporting mechanisms agreed	<i>This has been delayed awaiting sign off priorities.</i>

Update on Successes, Issues and Risks

Governance, Resourcing and Delivery

8. Our EDI Priorities Paper (see Appendix 1) have now been presented and signed off at both our EDI Strategic Board and Chief Officer Meeting. This provides us with the following:-
 - A clear action plan of 76 actions required to deliver our EDI Strategy.
 - A list of key deliverables which will be achieved in 2025/26 and which the 76 actions will help to execute.
 - An overarching plan of 3 'thematic' areas (evaluation, measurement and engagement) which we will use as strands that help to progress all actions.
9. With the addition of a Chief Inspector to the team, we have been able to create three working groups to help deliver against National Plans (Violence Against Women and Girls, Business Disability Forum and Police Race Action Plan). Our new OD Practitioner joined the team earlier this month and will have a strong focus on evaluation and measuring our impact.
10. We have also changed our approach to our internal EDI Boards where we continue to move away from narrative updates and discussion, towards evidence-based issues and tangible outcomes. By way of example, our recent Problem Statement Pack can be found at Appendix 3 and focuses on 3 key 'problem statements' which align to commitments made within our Strategy. By drilling down to three areas we aim to generate targeted action and have more impact.
11. The full Performance Framework can be found at Appendix 4.

Increasing Talent and Improving Culture

12. We are running a series of initiatives that align to the identification and progression of talent from our under-represented groups alongside taking steps to better understand and improve our culture. This board have previously been updated on our commitment to deliver Cultural Audits, our 'pilot' has now been completed, and we are in the process of producing a 'Team Cultural Audit Toolkit'. This toolkit will outline the triggers that identify the need for a cultural audit and provide guidance for delivery, thereby reducing pressures on the ICOD team by enabling others to lead. We will report on progress next quarter.
13. Our ICOD team also lead on the implementation of 'Insights Discovery', this is a tool designed to build stronger teams by facilitating effective team dynamics, improving communication and enhancing collaboration, thereby supporting multiple strands of the 'Our People' pillar of our Strategy. We have trained 10 internal 'Insights Practitioners' who will deliver up to 10 events a year, these may form part of our 'solutions' when addressing findings from our cultural audits.

Insights delivery is also a key part of our leadership development programmes, including Positive Action Leadership (PALs), Leading With Impact (LWI) along with our fast-track programmes. Furthermore, our staff survey undertaken in March of this year requires all Supervisors to produce 'improvement plans' based on their results, it is anticipated that demand for Insights Workshops will peak as a result.

Delivery of Inclusivity Programme

14. As part of our continued commitment to deliver our Inclusivity Programme, 10 events have been delivered to 384 attendees during quarter 1, a detailed evaluation document of these sessions can be found at Appendix 3, but as an overview: -

- 3 x 'Mentivity' 1-day inputs for frontline officers on understanding black history and our impact as police officers using stop & search / use of force powers.
- 3 x Active Bystander half-day inputs to build confidence and awareness of our requirement to challenge inappropriate language and behaviours.
- 2 x Ethical Dilemmas Training Sessions, presenting challenging policing scenarios to discuss and debate.
- 'Focus on... Equality, Justice and Racial Disparity', hybrid event delivered 13th February by external speaker.
- 'Focus on... Stammering', online event delivered 28th March by external speaker.

15. We aim to build upon our basic evaluation metrics prior to the next meeting of this board, as per the prioritisation of our 'Evaluation' thematic but also our commitment to evolve this programme. Alongside this, we need to examine our 'compliance' as a mandatory training programmes to be completed every 6 months.

Senior Leadership Involvement

16. A significant focus of our feedback from Inclusive Employers was on the need for our Senior Leaders to promote EDI throughout their respective business areas. In our bid to become one of the most inclusive and trusted Police Services, we have made a series of commitments which need to be embraced by all of our officers and staff, but especially those role models of higher rank and grade.

17. At our strategy launch, we asked that our leadership team openly pledge their commitment by outlining what they would be doing to support our ambitions in this area. At our Senior Leadership Forum in May, we took the opportunity to update and review these, as well as ensuring our new joiners and recently promoted officers participated. The force's emphasis on EDI was cemented

further when we invited guests from Inclusive Employers to present at this forum. They provided our leadership team with feedback on our standard award and included some benchmarking detail from across other forces / sectors. They also described areas where our Senior Leaders can help create an environment to not only maintain our Silver but progress towards Gold.

18. Finally, as part of our commitment for leaders to complete relevant EDI training, we have partnered with the University of Exeter to create a programme entitled 'Worldviews in the Workplace: Intercultural Awareness & Communication'. This will equip attendees with the knowledge and skills to embed intercultural awareness and religious literacy within our senior teams. This will take place in June for 30 Senior officers and staff, a full programme of evaluation and next steps will follow.

Notable national issues and developments

Supreme Court Ruling on Gender

19. On 16 April 2025, a judgment by the Supreme Court ruled that the terms 'woman' and 'sex' in the Equality Act 2010 refer only to a biological woman and to biological sex, and do not include transgender women who hold gender recognition certificates (GRCs). It is anticipated that this judgment will have far-reaching ramifications and lead to greater restrictions on access to services and spaces. The Equality and Human Rights Commission (EHRC) is expected to produce a new statutory code of conduct by the end of June for Ministerial approval, interim guidance has been made available, generating a mixed reception. At the time of writing, the National Police Chiefs Council (NPCC) has not issued guidance to forces while it considers the implications of the ruling.
20. Conscious of the importance of transparent and clear communication to both our colleagues and our communities, CoLP have taken the decision to not stand back from talking about this issue, balancing this with the need for official guidance and avoiding knee-jerk messaging. Locally, there is recognition within CoLP that the ruling will provoke strong and conflicting feelings- both personally for trans colleagues and the wider community, but also for our operational colleagues and how the ruling impacts working practices. Ensuring that everyone at CoLP has access to accurate information, and that regardless of sex, gender or preferred gender-identity; all colleagues are respected and fully supported is our immediate priority. In support of this, a working group has been established, led by Professionalism & Trust, with cross-force representation and including our Staff Networks. Several fast-time actions have been completed (including those around internal messaging, welfare and monitoring of community tensions). Others remain in progress around policy and procedure as we await national guidance.

Police Race Action Plan (PRAP)

21. The annual PRAP conference took place on 2nd May with attendees from across UK Policing, including wider NPCC attendance, as well as representation from Senior Leaders within CoLP. Keynote speakers provided updates on progress against the plan (which varies considerably from one force to another), the new 'anti-racism commitment for policing' which was launched in March 2025 and general accountability. A number of prominent speakers lent weight to the age-old adage of 'what gets measured gets done', proposing that future Policing inspections need to incorporate more measures on EDI generally and PRAP outcomes specifically.
22. A follow up meeting took place locally with Senior Leaders from the National PRAP and our ICOD team to discuss our progress against the plan and next steps. We will be required to complete a self-assessment using a soon-to-be-released 'maturity matrix' later this year so will be ensuring this is incorporated into our workplans. The establishment of our PRAP working group will help deliver and monitor progress against any resulting actions.

National Talent Development Strategy (NTDS)

23. Created by the College of Policing, this new strategy aims to help forces grow their leadership capacity, planning and investing in talent at every level. The NTDS aims to introduce a consistent approach to talent development across all forces and is dedicated to supporting leadership development, promotion and progression for everyone in policing, ensuring that those who demonstrate potential are: (a) recognised, (b) able to progress, and (c) equipped with the skills they need to be successful. There is an expectation on all forces to complete 6 strands of activity including appointing sponsorship, utilising positive action, identifying under-represented talent and enhancing talent mobility.
24. The roll out of this strategy will require input from across the force, much will be led by HR, a working group is already in place to help us plan our response. Existing programmes within CoLP, including our Positive Action Leadership Scheme (PALS) and Sponsorship Schemes, will need to evolve to capture some of these outputs. Somewhat reassuringly, this does align to our EDI Strategy and priorities for this year. However, there are clearly some new areas of work which, going forwards, will require more substantial involvement from ICOD.

Ownership of 'Wellbeing' Portfolio

25. Until early 2025, this portfolio was coordinated by a CoLP Chief Inspector as an addition to their day job, with oversight from a Chief Officer Sponsor. In acknowledging the significant breadth of this work going forwards and the

requirement for more focused action, discussions have taken place to identify where future activity should be led.

26. Due to the subject matter, it is difficult to determine a 'clear' owner, with many actions cross-cutting multiple departments, including HR and Professionalism and Trust. As such, it has been agreed that HR and Professionalism & Trust will jointly hold the responsibility for the Wellbeing Portfolio. This approach will support the delivery of the National Police Wellbeing Strategy by creating, promoting, and maintaining the conditions for all who work in policing to live healthy lifestyles in healthy environments, thereby reducing injury, illness and suicide to maximise wellbeing, work ability and a sense of belonging. It is hoped that this will also help to support national initiatives to recruit and retain Officers and Staff. Progress will be monitored against five priority areas: (a) Recruit Well, (b) Train Well, (c) Live Well, (d) Work Well, and (e) Leave Well.
27. Work is required to fully understand the impact that this will have on demand and capacity within the ICOD team. However, it is anticipated that we will feature strongly within the 'Train Well' and 'Work Well' elements of the plan which incorporate trauma resilience, neurodiversity support, physical and psychological needs of colleagues and stress at work. Conscious that this does not currently form part of our EDI Strategy or workplan, we are aware that this is inextricably linked to our inclusivity objectives and are therefore mindful of this additional pressure.

Appendices

Appendix 1: ICOD Priorities and Deliverables Paper Update

Appendix 2: EDI Problem Statement Pack

Appendix 3: Inclusivity Programme Evaluation Pack JAN-MAR 2025

Appendix 4: EDI Full Performance Framework

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Appendix 1- Report delivered at EDI Strategic Board (8th May) and Chief Officer Meeting (9th May) updating on ICOD Priorities and EDI Implementation

Summary

This paper provides Chief Officers with an update on the priorities of the Inclusivity, Culture and Organisational Development (ICOD) team for the following year. This links in with the team's ongoing work on the EDI Strategy Implementation Framework and accompanying Implementation Plan presented to PSIC earlier this year.

Main Report

BACKGROUND:

Our new Equity, Diversity and Inclusion (EDI) Strategy was launched in July 2024 following extensive consultation. It makes a series of commitment statements to run over the next 3 years under 4 key themes:-

1. ***Our People***- increasing diverse representation, improving our standards and ethics, driving inclusive leadership and individual accountability, creating an equitable working culture and delivering zero tolerance on behaviours which compromise this.
2. ***Our Policies and Processes***- ensuring they are equitable, accessible, inclusive and informed through diverse representation of our police and by independent scrutiny.
3. ***Our Public***- building and sustaining authentic engagement with our communities to ensure their confidence in our policing.
4. ***Our Partners***- leading by example in building inclusive relationships and fostering innovative collaboration.

The Strategy acknowledges that delivery against these commitments in the City of London Police is not new; on the contrary, the document outlines the progress we have already made in this field. It enhances this further by creating a structure around what currently exists (under the '4P headings), along with defining our future direction and how we will measure success.

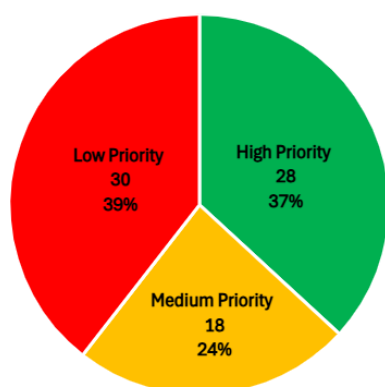
APPROACH

We have worked with our internal stakeholders (including our Staff Networks and Associations) along with external partners (including EDI specialists such as Business Disability Forum and Inclusive Employers), to help inform our priorities for the forthcoming year. Instrumental to this has been our close working relationship with

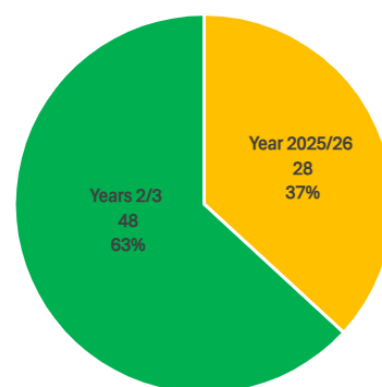
colleagues in the Corporation who we continue to work with in refining our EDI framework and implementation plan.

This has resulted in an extensive plan of work with 76 individual actions across the '4P' areas, some of which have been completed and many of which are in progress. As a 3-year plan, it is ambitious. However, we have prioritised them in to 'high', 'medium' and 'low' categories and aligned our annual plans to this. As a result, 28 of the 76 actions become priorities we will progress in 2025/6.

ICOD Priority Rating by Year



2025/26 Priorities vs. Years 2/3



Although it is widely acknowledged that EDI is 'everyone's business' within CoLP and we need to ensure a forcewide approach to many of the tasks, we also appreciate that much of the activity and co-ordination will be driven by the ICOD team. We have worked collectively to identify three strategic priorities along with ten key deliverables we would want to progress. We have conducted the first of a series of internal workshops to task actions and create quarterly milestones and predictions within the team. We continue to work closely with our colleagues at the Corporation to further refine our Implementation framework.

OVERALL AMBITION

Our overall EDI ambition, to become 'one of' the most inclusive and trusted police services in the UK, must be the driver for all of our activity. This commitment was made at the EDI launch and has been consistently spoken of in boards and other events. It is imperative we deliver on this and keep it at forefront of our work, mindful this ambition is also highlighted within our Policing Plan. In keeping EDI Strategy as our core doctrine in this space, we need to remain consistent with our '4P approach' and again ensure these thematic areas are all being served.

Our wider EDI workplan is ambitious; we believe that to achieve our EDI ambitions, it absolutely needs to be. However, we recognise the impact that the dynamic nature of the portfolio and the resourcing and capability gaps which exist in the team have on

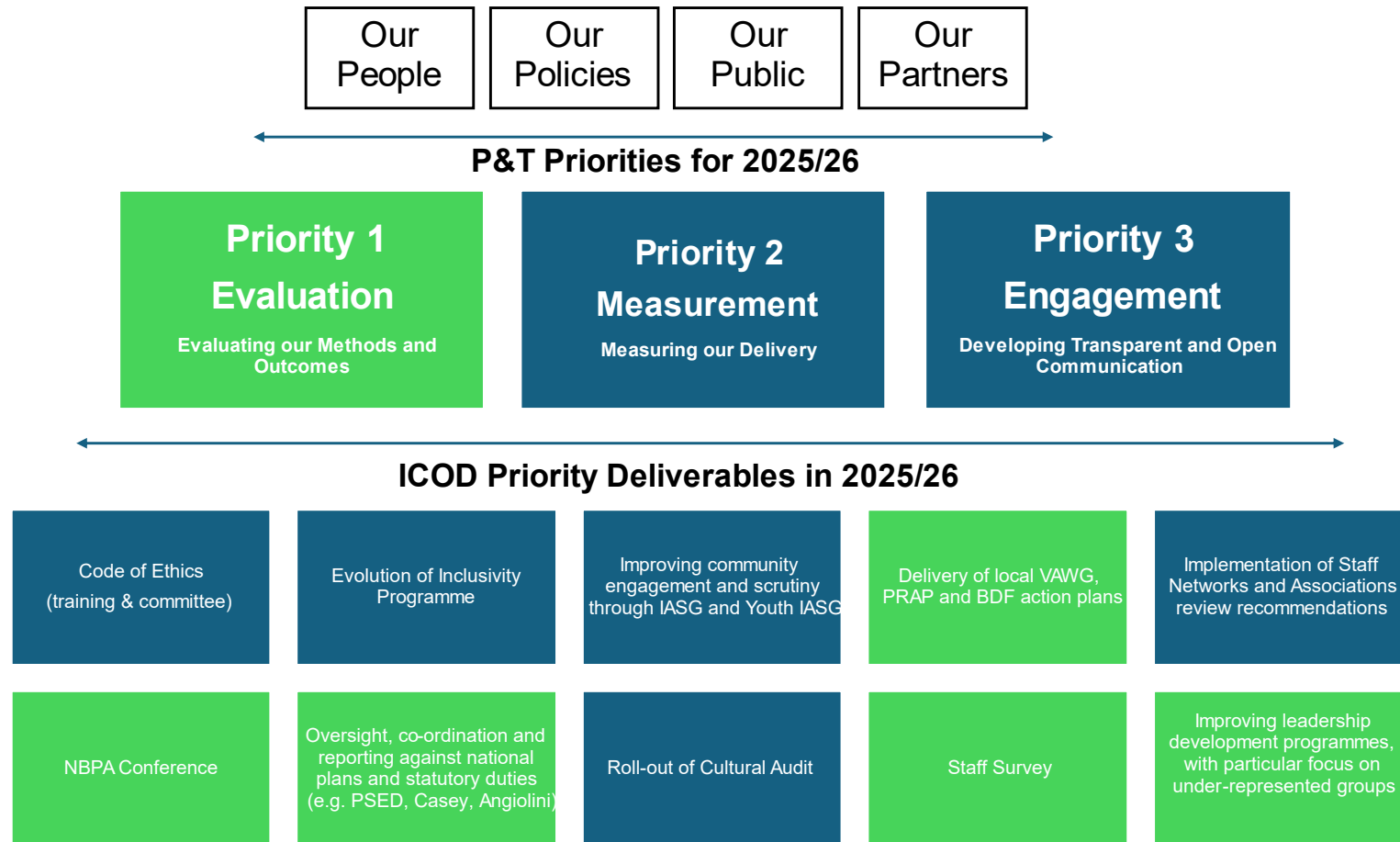
capacity, which means that we need to prioritise our efforts over the next 3 years to meet our aims.

As part of our ongoing accreditation journey, Inclusive Employers estimate that the journey to progress from 'Silver' to 'Gold' can take anywhere from 3 to 5 years. This requires that we lay down some solid foundations in areas which have previously been overlooked due to the pace and speed of progress, bringing us to our 3 thematic priorities.

The diagram below outlines those priorities and key deliverables we would want to progress and deliver over the next 12 months to place CoLP in the best position to make meaningful progress towards our EDI ambitions. However, when reflecting on the resources and skills gap, coupled with new portfolio responsibilities, linked to Wellbeing (culture) and National Talent Development; alongside emergent issues such the recent Supreme Court ruling; these priorities and key deliverables have been further refined to reflect the actual capacity within the team to deliver them. The impact of this refinement is reflected in the diagram:

- Of the three thematic priorities identified, only 'Priority 1 – Evaluation' (backfilled in green), will be progressed to completion in 2025/26. The remaining two thematics will remain a priority but will not be delivered over the next 12 months without changes to the current capacity or skills gap.
- Of the ten key deliverables identified, five will be progressed to completion in 2025/26 (backfilled in green). These include NBPA conference, Reporting as per our Statutory Duties and National Plans, Staff Survey, Leadership development and delivery of local VAWG, PRAP and BDF action plans. The remaining five key deliverables will not be delivered in the next 12 months without changes to the current capacity or skills gap.

CoLP EDI Ambition ~~To~~ To be one of the most inclusive and trusted police services in the



ICOD THEMATIC PRIORITIES

What we can deliver:

Priority 1- Evaluation

This has long been acknowledged as a weakness within EDI, L&D and Policing more generally. A number of projects have been underway for some time, including our Positive Action Leadership Scheme (PALs) and Inclusivity Programme. Albeit we conduct a basic evaluation of these initiatives (a 'teams' survey asking participants whether they found sessions valuable and would they recommend), we need to build on this to truly understand how they impact on behaviour change and progression within. In working with partners in private sector and academia, we are drafting our first evaluation strategy and with our new Organisational Development practitioner soon to be joining our team, will be able to dedicate resource to this.

Action Checkpoint

In 2025/26 we will-

- Consult with external experts
- Write our first Evaluation Strategy
- Implement our Programme of Evaluation

What we can deliver with additional support/resources:

Priority 2- Measurement

Within our EDI strategy, we have detailed the metrics we will use to measure our impact. This will include our progress against, to name a few: diverse representation within our organisation, disproportionality (around use of force, stop & search, PSD data and criminal justice outcomes), community satisfaction and ethical partnerships. In acknowledging the demand for research and analysis across the force, we know we need to make best use of shared resources as well as investing in upskilling our team to be able to identify, capture and interpret both quantitative and qualitative data. We need to present this at our EDI boards to showcase progress but also identify areas of concern so that can be addressed.

Action Checkpoint

In 2025/26 we will-

- Produce dashboards for each of our 4Ps
- Use data to inform Problem Statements
- Highlight gaps in our metric capability with a view to innovating solutions

Priority 3- Engagement

Key to successful policing engagement is ensuring that we are operating with absolute transparency across all our workstreams and

that we are communicating this effectively to our communities. This is relevant both internally, where we are actively creating psychologically safe spaces for colleagues' voices to be heard through our cultural audits and listening circles, and externally, where we aim to build our programme of existing work with youth groups and our wider community. Alongside this, we need to build a 'one stop shop' for force EDI on our intranet space to ensure ease of access to our workplans, toolkits and offerings from our Inclusivity Programme.

Action Checkpoint

In 2025/26 we will-

- Refresh and revamp our EDI intranet pages
- Work with colleagues in Corporate Communication to develop a communication plan for EDI
- Review and refresh the Youth Independent Advisory Group and Independent Advisory & Scrutiny Group

**ICOD
PRIORITY**

DELIVERABLES**What we can deliver:****1) Delivery of VAWG, PRAP and BDF Action Plans**

ICOD are responsible for the co-ordination and delivery against a number of 'localised' action plans including Violence Against Women and Girls (VAWG), Police Race Action Plan (PRAP) and our Business Disability Forum (BDF). These are driven by our National Police Chief's Council and their respective leads, with some additional requirements from the College of Policing (for example, Code of Ethics).

It is worth noting that there are other ‘National’ Action Plans in circulation which are not mandatory for forces to complete- for example, a National LGBTQ+ Strategic Plan. Our review of the landscape will identify which plans exist, to ensure appropriate governance, co-ordination, delivery and reporting.

Action Checkpoint

In 2025/26 we will-

- Create working group for Police Race Action Plan to feed local and national updates.
- Create working group for VAWG Action Plan to feed local and national updates
- Review the EDI landscape for National Policing Plans / Recommendations to ensure feed through to CoLP

2) National Black Police Association (NBPA) Conference 2025

This is the only action within the plan, which was not referenced specifically within the EDI strategy, it has only recently been confirmed that CoLP would be hosting this year’s event. We understand that this opportunity will take up considerable resource at varying points during the planning stages, it will require ongoing collaboration with our own local BPA, the NBPA, along with our internal and external stakeholders. We are already experiencing some of the political sensitivities and challenges that this presents and will need to be properly managed going ahead. We recognise the importance of ensuring that, as hosts, we deliver an exceptional event.

Action Checkpoint

In 2025/26 we will-

- Support the Planning Committee for the NBPA Conference 2025, providing the core link between our local BPA and others
- Ensure a full programme of evaluation for this event, including legacy for CoLP and Corporation
- Provide training and development opportunities for our Network Members

3) Staff Survey

The force entered a three-year partnership with staff survey provider 'Any-3' in 2022 and we launched our third Staff Survey in March 2025. A comprehensive communication plan has ensured consistent response rates, alongside which we have seen an improvement in engagement scores. Our focus this year will be on ensuring completion of improvement plans by Supervisors, with a communication plan wrapped around this. Once this year's survey is completed, a Force report will be sent to the Chief Officer Team and Senior Leadership Teams, this will then be followed by each department within Force being provided with a bespoke report relevant to their area(s) of responsibility. Managers will be asked to develop/amend (if required) their improvement plans in conjunction with team members. 'Any 3' will complete their three-year partnership with a Pulse Survey in Sept 2025 so we will also need to start our procurement process this year in readiness for the Staff Survey in 2026.

Action Check Point

In 2025/26 we will-

- Provide support to our leaders to produce development plans in response to their team results
- Begin procurement process for 2026 provider
- Update our force on results, thematic areas and organisational response

4) Delivery of Leadership Development Programmes

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 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. Following a successful pilot in February 2025, ICOD are now supporting L&D in future roll out during 2025. Alongside this, we will continue to prioritise our leadership offering for diverse groups, ensuring appropriate accessibility and support.

Action Check Point

In 2025/26 we will-

- Conduct pilot of leadership training and implement recommendations into programme
- Prioritise rollout for our 530 (Sergeants/Inspectors and staff equivalents), with 120 expected Year 1
- Evaluate success / difference made and act on any recommendations

5) Oversight, co-ordination and reporting against National Plans and Statutory Duties

There are a number of statutory and legal obligations asked of ICOD; we need to publish our Annual Public Sector Equality Duty (PSED) 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. Alongside this, a number of National Inquiries- for example Hotten, Casey and Angiolini- require CoLP to implement recommendations agreed by the Government, these also largely sit within the realm of Professionalism and Trust.

Action Check Point

In 2025/26 we will-

- Write and publish our PSED by May of each year
- Implement recommendations from Angiolini (Parts 1 through 3)
- Explore pay gap reporting in relation to race as per PRAP

What we can deliver with additional support/resources:

Committee)

6) Code of Ethics (Training and

Following the launch of the new Code of Ethics by the College of Policing last year, ICOD remain committed to its ongoing delivery, as announced at our workshop event last year. Alongside this we will continue to deliver our Ethical Dilemmas training as part of our Inclusivity Programme. We are also in the process of establishing our own internal Ethics Committee to help showcase the new code in action and provide additional scrutiny to our decision making. Although this area stretches across all 4 pillars of work (people, policies, partners and public), there is a clear link with our work on ethical partnerships and ensuring fairness of opportunity and social value within our supply chains.

Action Checkpoint

In 2025/26 we will-

- Write and agree TORs for a new Ethics Committee
- Decide on audience / chair for Ethics Committee and hold inaugural meeting
- Deliver 4 modules (minimum) of Ethical Dilemmas training across force

7) Evolution of Inclusivity Programme

Having launched in 2023, our Inclusivity Programme has now delivered over 2,000

sessions for our colleagues across modules including Active Bystander, Mentivity and Black History, Unconscious Bias, Understanding Neurodiversity, Tackling Violence Against Women and Girls, Challenging victim-blaming language, Understanding LGBTQ+ Terminology and Implementing Reasonable Adjustments. We are confident that our colleagues understand the expectation that there is now a mandatory requirement for them to complete 2 modules every year. However, our focus this year will be twofold: - firstly, a closer examination of compliance and monitoring attendance (including ensuring visibility from our Senior Leadership Team), and secondly, as alluded to previously, a stronger programme of evaluation to understand what difference is being made.

Action Checkpoint

In 2025/26 we will-

- Informed by data, deliver at least 12 different modules of activity across 12 months to facilitate completion of 2 mandatory modules per year.
- Understand compliance levels (know our baseline) and implement a strategy to improve upon this
- Implement evaluation strategy to understand impact and meaning.

8) Roll-out of Cultural Audit

As part of our proactive approach to understanding and mapping micro cultures and behaviours 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 to Chief Officers. 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, ICOD continue to prioritise implementation of these improvements before prioritising further roll out across the force.

Action Check Point

In 2025/26 we will-

- Incorporate recommendations from COT into methodology
- Undertake minimum of four cultural audits
- Ensure availability of toolkit for use by line managers

9) Improving Community Engagement and Scrutiny through IASG and Youth IASG

ICOD has, as of January 2025, taken ownership of our Youth Independent Advisory Group (YIAG), where we continue to build on effective membership and engagement. 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, alongside more general youth engagement. We have already witnessed how powerful their insights can be following recent scrutiny of our Stop and Search procedure and process. All this will ensure effective governance, reporting and evolution of existing activity.

Action Checkpoint

In 2025/26 we will-

- Take full ownership of the YIAG
- Create a programme of activity for YIAG Year 1
- Agree reporting structure / information sharing protocol between ICOD and Local Policing for our Police Cadets

10)

Implementation of Staff Network and Associations Review Recommendations

We recently completed a review of our Staff Networks and Associations, implementing a number of recommendations relating to dedicated time for activities, governance, budgeting and training. Many of these relate to recommendations made by Inclusive

Employers and we are now in the process of actioning. 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. This priority is also mirrored by the Corporation who are ensuring their network members are empowered at grassroots level and have proper resourcing in place.

Action Checkpoint

In 2025/26 we will-

- Seek to properly understand the dedicated time required by our network members and put in place policy to support this.
- Ensure budgetary allowances are made for each Network /Association pending their submission request for the forthcoming year.
- Provide training and development opportunities for our Network Members

Additional Support & Resources

The staffing challenges within ICOD, linked to long-term sickness, vacancy and other abstractions has resulted in sustained resourcing gaps; displacing demand onto the remaining team and negatively impacting on health and wellbeing. While COT's commitment to supporting ICOD through prioritising recruitment to fill these gaps is welcomed, more help is needed.

Benchmarking has been completed, with 20 forces responding, to understand how delivery of EDI is resourced across policing. On average, of the forces that responded, their EDI teams numbered 8 FTEs. This compares favourably with CoLP who have 6 FTEs, including the following dedicated EDI posts: Chief Inspector, Sergeant, EDI Manager and 3 x PCs. This figure excludes the Superintendent post, which stretches across ICOD and L&D; providing strategic direction and governance, two Organisational Development Consultants and Staff Officer post.

Headline themes emerging from the benchmarking exercise include:

- Most forces utilise shared analytical support from force wide assets
- Some have dedicated asset

- Focus on youth engagement
- Most forces have VAWG/PRAP sitting separately to 'pure' EDI
- Many forces have 'positive action' posts
- Some forces have recognised the need for dedicated communication support

It was identified during the Business Planning Process that there is a lack of measurable demand and 'effort' data mapped against the establishment (which has never been met) or the current strength for ICOD. Without this, it is recognised that the business case for more resources is undermined.

To provide the best opportunity to allow CoLP to meet the ambition of achieving gold accreditation on the Inclusive Employers Standard within the next 3 years, it is asked that the following requests be considered for prioritisation to ICOD.

1. **Business Analyst** – Dedicated support from CPO to deliver a fast-time review of ICOD. This will specifically address gaps in knowledge and formalise the organisational understanding of how delivering cultural and behavioural change should be quantified and measured as part of the Business Planning Process. Moreover, following this review, benefit will be derived from the identification of gaps or areas for improvement; helping drive efficiencies and improve operational delivery. This will also inform future discussions about the optimum operating model for ICOD from an evidence-based perspective.
2. **Data Analyst** – Dedicated support to allow for more cross organisational data capture and analysis to build understanding of the organisational culture and areas of risk and assess effectiveness and impact using multiple data points. Additionally, this will allow for consistent reporting against various strands including Public Sector Equality Duty, national plans including VAWG and PRAP and multiple governance boards. It is recognised that this capability is being built as part of CoLP's Data Strategy, but more immediate support is requested.

Kate MacLeod, Head of Inclusivity, Culture and Organisational Development

Professionalism and Trust

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Equity, Diversity and Inclusion Strategic Board

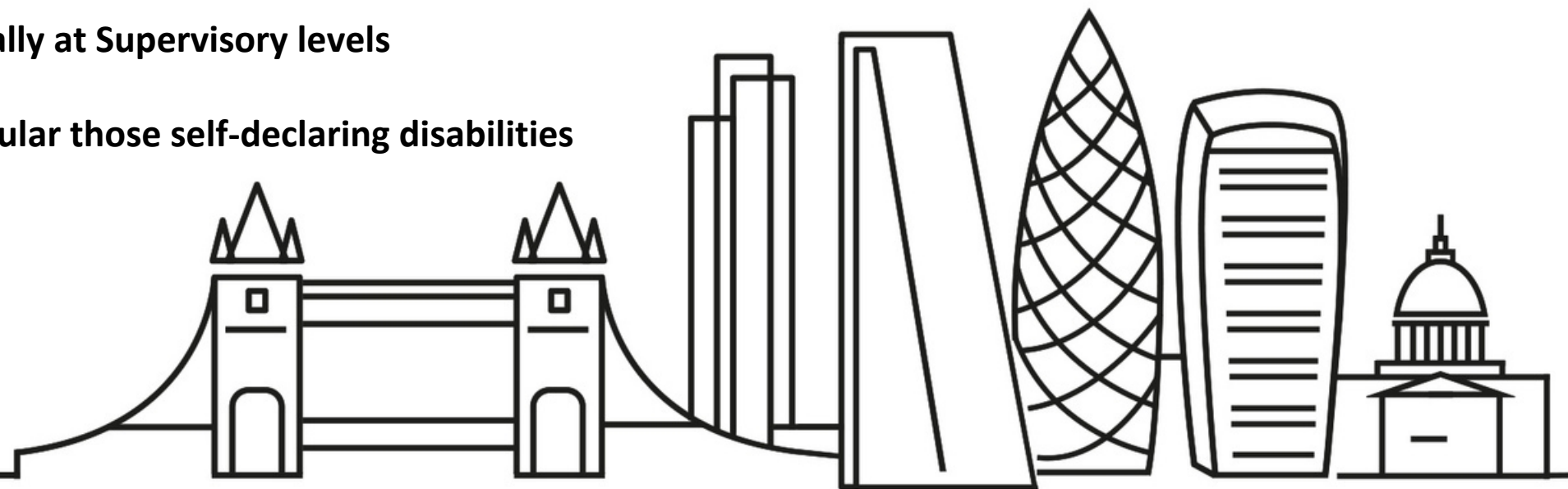


EDI Data / Problem Statement Pack produced by Inclusivity, Culture and Organisational Development (ICOD) Team

'Our People' Commitment 2 Deep Dive, May 2025

Summary of Problem Statements

- 1) Under-representation of ethnic minorities within City of London Police, especially at Supervisory levels
- 2) Under-representation of female officers within City of London Police
- 3) Poor disclosure rates of protected characteristics for CoLP employees, in particular those self-declaring disabilities



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



Our People – Commitment 2

We will increase the diversity of under-represented talent from all backgrounds, at all levels across our service



Problem statement 1

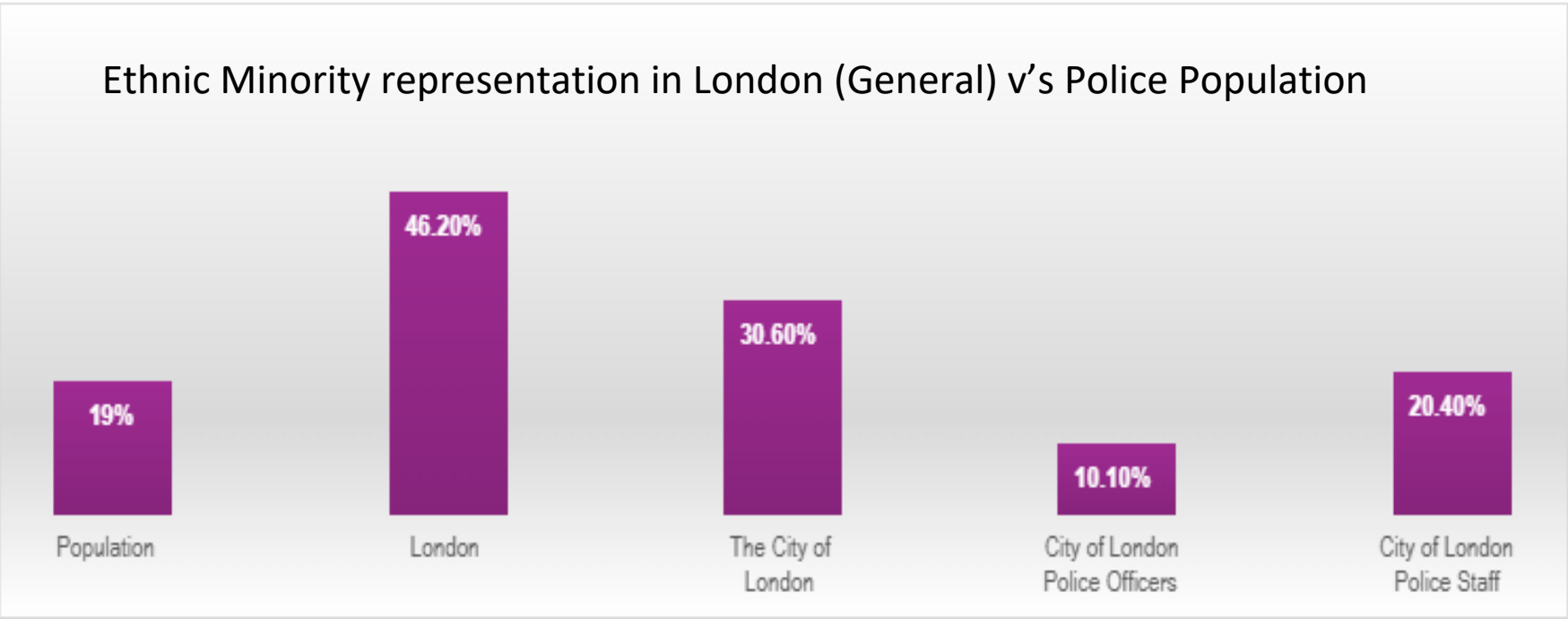
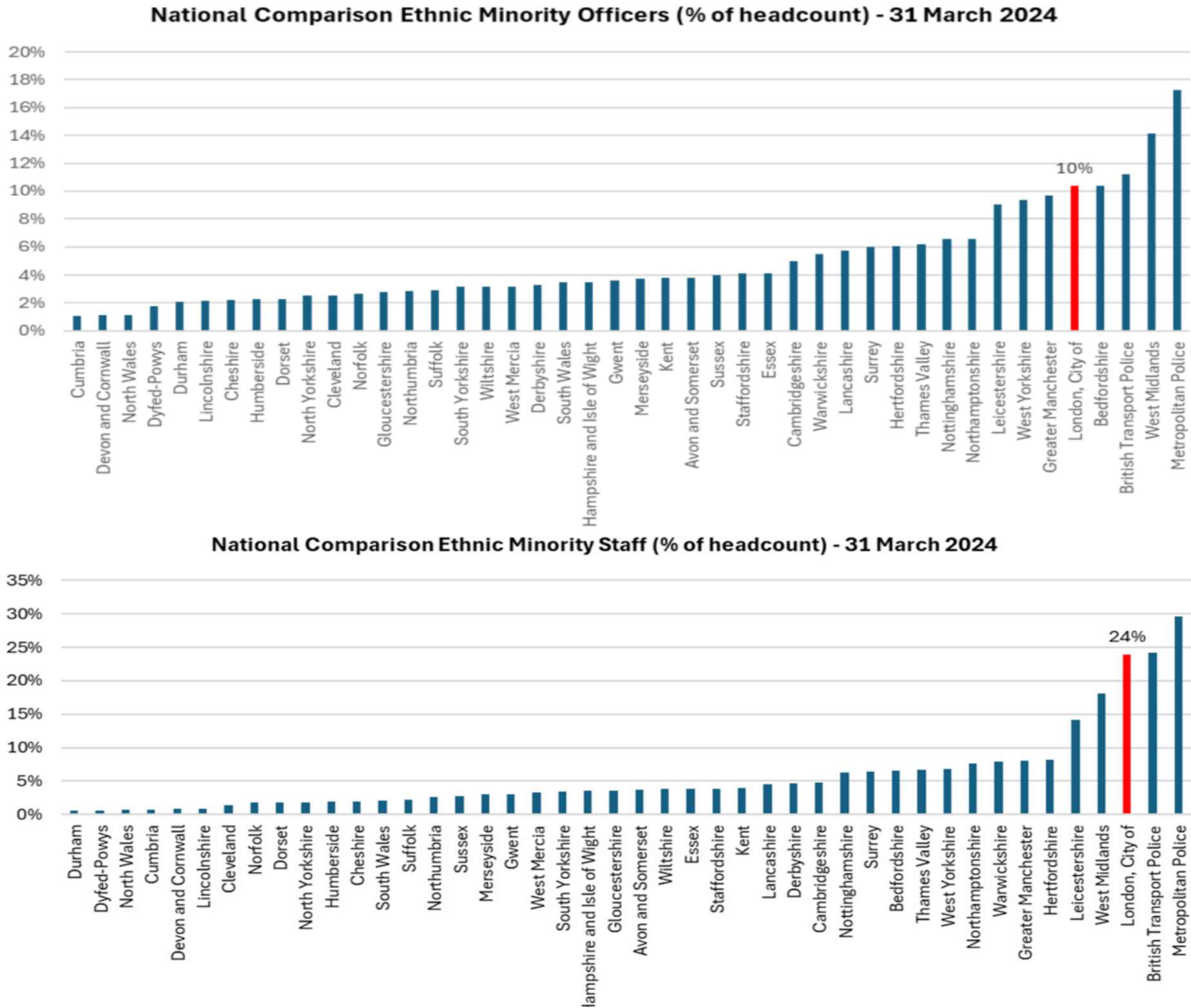
Under-representation of ethnic minorities within CoLP, especially at Supervisory levels

Analysis

- Our overall representation of numbers of ethnic minority officers and staff in CoLP ranks well ie for Officers and Staff at 5th and 3rd National highest respectively, out of a total of 44 forces. For officers this equates to 10% of our workforce and for staff, this is 24%.
- Met Police is 1st placed across both Officers (17%) and Staff (29%).
- However, if we focus on London data, this does change the picture slightly- the population of City of London (total 8600) is made up of 30.6% ethnic minority and wider London higher at 46.2%. Note that for wider UK it is 19%*.

(*‘Ethnic’ in this instance incorporate black, Asian, mixed and ‘other’)

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Sources for all National data- Office National Statistics / Home Office Police Workforce 2023/24



Problem statement 1 Continued

Under-representation of ethnic minorities within CoLP, especially at Supervisory levels



Analysis

The picture changes further still when we focus on CoLP data provided by HR and ethnic representation by rank / grade:-

- For officers, there are 103 in total representing ethnic minority backgrounds. Of these, 91 are at Constable level but only 7 at Sergeant, 2 at Insp, and 1 each at Chief Insp, Chief Supt and Cmdr (0 Supt).
- For staff, there are 152 in total representing ethnic minority backgrounds. Of these, 116 are at Grades A-D, 20 at Grade E and just 7 at Grades E+ and upwards.

Green = Anything above 30% EM as percentage of rank / grade.

Amber = 10-30% EM as percentage of officer rank, 20-30% EM as percentage of staff grade.

Red = Anything below 10% EM as percentage of officer rank and below 20% EM as percentage of staff grade.

* 9.5% of staff and 13.4% of officers = ethnicity 'not stated'

Rank	Number Ethnic Minority	EM as percentage at this rank
Con	60	12%
Det Con	31	12%
Sgt	4	6%
Det Sgt	3	5%
Insp	2	11%
Det Insp	0	0%
Ch Insp	0	0%
Det Ch Insp	1	4%
Supt	0	0%
Det Supt	0	0%
Ch Supt	1	33%
Det Ch Supt	0	0%
Cmndr	1	100%
Dep Comm	0	0%
Comm	0	0%
Total	103	
Total Headcount 31/3/25	1000	
%	10.3%	

True Grade	Ethnic Minority	Ethnic Minority by percentage by grades
A.	1	33%
B.	7	35%
C.	54	30%
C/D	0	N/A
C+	1	17%
D.	53	26%
E.	29	18%
E+	1	17%
F.	5	14%
G.	1	6%
H.	0	0%
I./J.	0	0%
Total	152	
Total Headcount 31/3/25	642	
%	24%	



Problem statement 1 Continued

Under-representation of ethnic minorities within CoLP, especially at Supervisory levels



Decision

- To improve the level of ethnic minority representation within CoLP at all levels, but with special focus on our Supervisory ranks and grades.

Existing actions within EDI Strategy

Action Ref	Actions	Owner	Status
2.1	Write and deliver recruitment strategy	HR	In progress
2.2	Delivery and Evaluation of Positive Action Learning Scheme	ICOD	In progress
2.4	Delivery and Evaluation of Sponsorship Scheme	ICOD	In progress
2.7	Creation of Retention and Exiting Workgroup (with programme of work in place)	NLF	Completed
2.8	Delivery against statutory requirements (including PSED)	ICOD	In progress
2.10	Monitoring of recruitment, promotion and retention data	HR	In progress

3 Key Considerations / Recommendations

- 1) Evaluation of our existing programmes targeting under-represented groups (PALs, Sponsorship) to understand impact and outcome alongside National benchmarking of success stories.
- 2) Better understanding our data (application, recruitment, promotion, development, retention, exiting) to identify blockers and inform our recruitment strategy.
- 3) Do we want to set any targets / milestones in relation to this thematic?



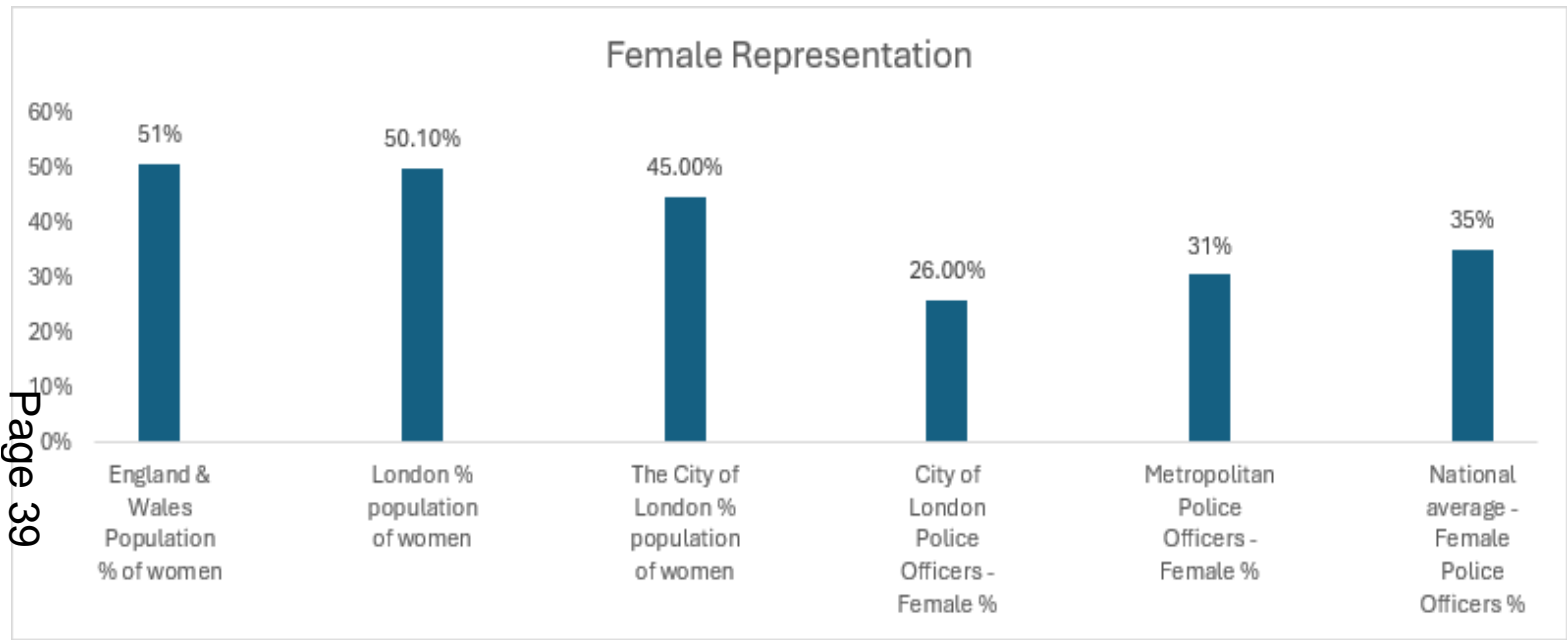
Our People – Commitment 2

We will increase the diversity of under-represented talent from all backgrounds, at all levels across our service



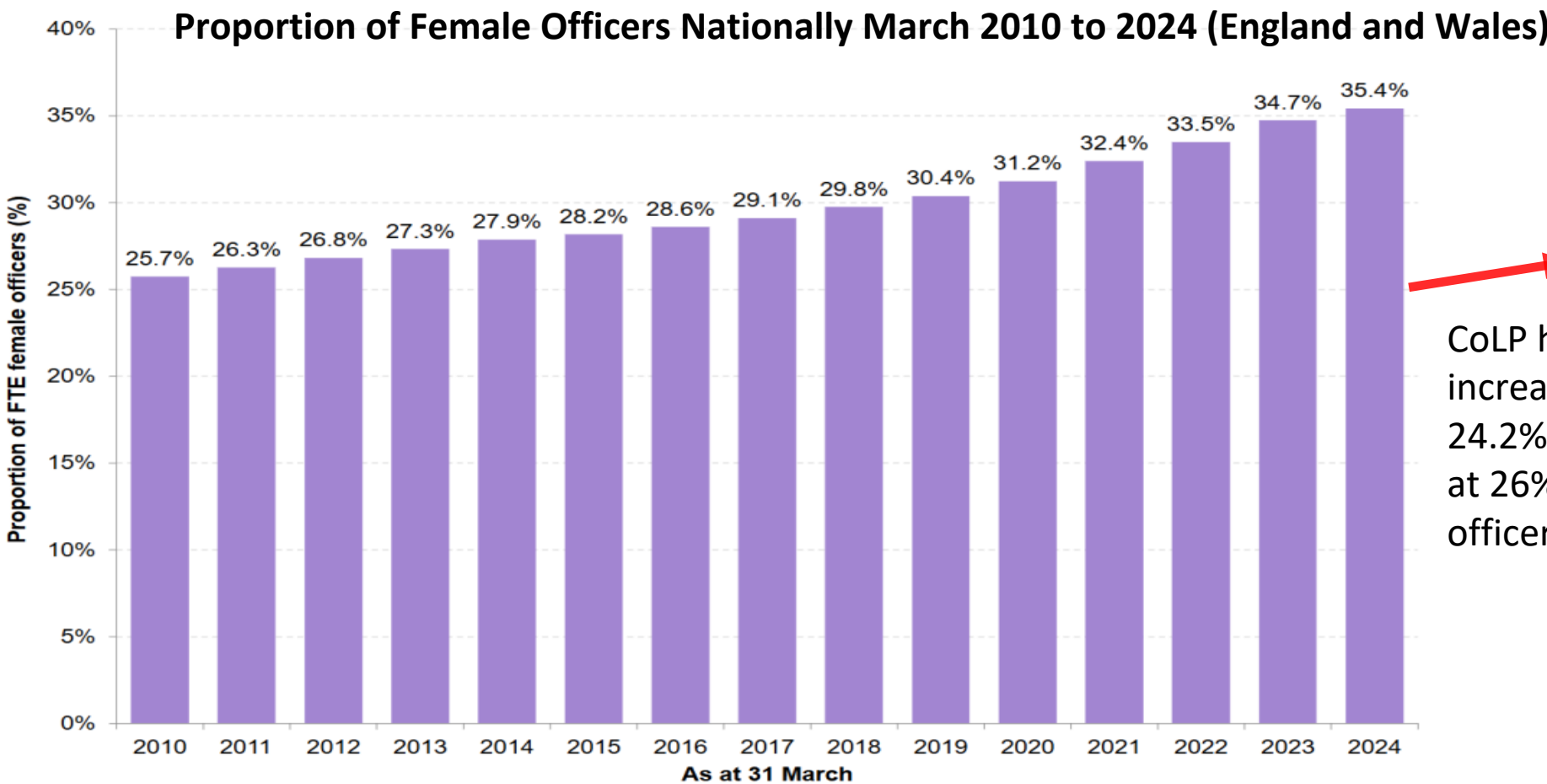
Problem statement 2

Under-representation of Female Officers within City of London Police



Source above- Police workforce, England and Wales: 31 March 2024 - GOV.UK A New Met for London (2024)

Source right- Home Office Police Workforce data (March 2024)



CoLP has seen an increase from 24.2%, currently at 26% of total officer workforce

Analysis

- With the UK general population being made up of 51% female and the City of London specifically 45%, we can see that City of London Police Officer representation is low across London at 26%. It is worth noting that for female staff representation we are in a much better place at 61%, far higher than the National force average.
- Home office data from March 2024 tells us that Cumbria had the highest proportion of female officers (42.6%) followed by North Wales (41.0%). The City of London Police had the smallest proportion of female officers (24.2%) followed by the MPS (31.3%) and Dorset Police (32.6%).
- We know that since then, our rates have continued to gradually improve and now sit at 26.00%. However, we are still far lower than the National average proportion of female officers across all 44 forces, at 35%. *NB- Met have also shared an increase and are now at 31%.*
- Analysis of the spread across rank and grade did not highlight any immediate areas of concern, with a number of the SLT identifying as female. However, further analysis would be required to look at specific promotion points and also representation across specialist posts.



Problem statement 2 Continued

Under-representation of Female Officers within City of London Police



Analysis

If we breakdown gender representation by rank and grade, there are very few areas of concern. On the contrary:-

- Our representation for female staff (394 in total) is above the national average for women in policing across all grades.
- At our Senior Officer ranks, female representation is very strong with 4 Supt, 3 Chief Supt and 1 Cmndr (there a few exceptions at higher ranks but these are not statistically significant).
- For all officers, there are 260 women in total. Of these, 197 are at Constable level (with strong numbers of female Detectives).
- We are however below National average at Insp and Chief Insp ranks which could be a future area of focus.

Green = Anything above 31% (notional average for women in policing)

Amber = 20-30% slightly below average of women in policing

Red = Anything below 20%

Grade/Rank	Female	% women by rank
Con	108	22%
Det Con	89	35%
Sgt	20	28%
Det Sgt	11	17%
Insp	5	26%
Det Insp	9	29%
Ch Insp	4	27%
Det Ch Insp	7	30%
Supt	1	33%
Det Supt	3	43%
Ch Supt	3	100%
Det Ch Supt	0	0%
Cmndr	1	50%
Dep Comm	0	0%
Comm	0	0%
Total	260	
Total headcount	1000	26.0%

Gender by Grade		
Grade	Female	% of women by Grade
A.	3	100%
B.	14	70%
C.	117	66%
C+	3	50%
D.	122	60%
E.	97	60%
E+	5	83%
F.	15	42%
G.	13	72%
H.	4	33%
I./J.	1	33%
Total	394	
Total headcount	644	61.0%



Problem statement 2 Continued

Under-representation of female officers within City of London Police



Decision

- To improve the number of female officers within the City of London Police by focusing on recruitment, development, promotion and retention activity, to identify how we can recruit higher numbers (of students and transferees) and also address any barriers in relation to applications, career development and retention.

Existing actions within EDI Strategy

Action Ref	Actions	Team owner	Status
2.1	Creation and delivery of recruitment strategy	HR	In progress
2.7	Creation of Retention and Exiting Workgroup (with programme of work in place)	NLF	Completed
2.8	Delivery against statutory requirements (including PSED)	ICOD	In progress
2.10	Monitoring of recruitment, promotion and retention data	HR	In progress

3 Key Considerations / Recommendations

- Utilising a sound evidence base (including both quantitative and qualitative data) to improve understanding of barriers for progression within CoLP of our female officers and use this to inform future recruitment and development activity.
- Review processes in place to scrutinise and understand data and disproportionality, building our understanding of representation within specialist posts especially.
- Do we want to set targets / milestones for this thematic?



Our People – Commitment 2

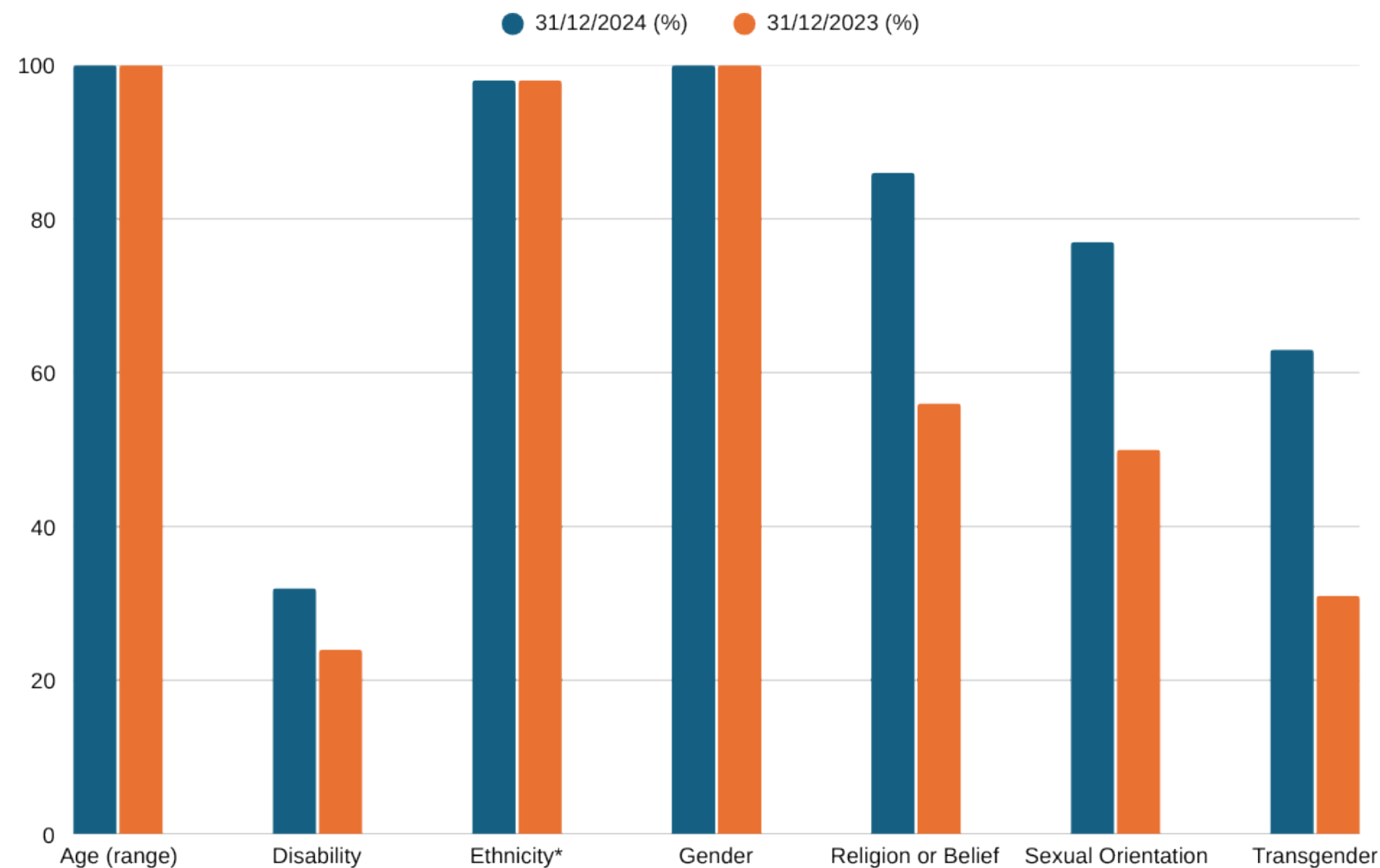
We will increase the diversity of under-represented talent from all backgrounds, at all levels across our service



Problem statement 3

Poor disclosure rates of protected characteristics for CoLP employees, in particular those self-declaring disabilities

Disclosures Rates of City of London Police Officers across all Protected Characteristics
Comparison of 2023 and 2024 data



Analysis

This chart shows the disclosure rates of colleagues across the last two years, including data from year-ends 2023 and 2024. Of note:-

- Officers and Staff are encouraged to provide details of any protected characteristics at various points in their careers- including on application, on appointment, staff surveys and so on. As well as via specific data gathering exercises (such a prompts on Intranet from HR/Comms team).
- Of positive note, there has been an increase in self-declaration across all protected characteristics from 2023 to 2024 (apart from age range, ethnicity and gender which have remained the system).
- However, of concern is the level of self-declaration for disability. Whilst we recognised that there has been an increase of 8%, this is still considerably lower when compared with other categories.

When considering this problem statement, we should also note the National Picture- 10.2 million UK people of working age (16 to 64) reported that they were disabled in Dec 2023, which is 24% of the working population and an increase of 0.5 million from the year before*.

*Source- DWP Family Resources Survey 2023



Problem statement 3 Continued

Poor disclosure rates of protected characteristics of CoLP officers and Staff, in particular those self-declaring disabilities



Decision

- To improve the levels of self-declaration of protected characteristics from our colleagues, especially those with disabilities.

Existing actions within EDI Strategy

Action Ref	Actions	Team owner	Status
2.8	Delivery against statutory requirements (including PSED)	ICDD	In progress
2.9	Ensure ability to update diversity data for all staff	COMMS	In progress
2.1	Monitoring of recruitment, promotion and retention data	HR	In progress
2.1.2	Plan created to address poor disclosure rates relating to protected characteristics	ICDD / Cmdr Shaw	In progress

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3 Key Considerations / Recommendations

- Working with key stakeholders, including Disability Enabling Network (DEN) and members, build upon our understanding of why there is low declaration for this protected characteristic and what we can do to address this ie do colleagues understand the benefits in disclosing, are there additional layers relating to intersectionality?
- Is the process of updating personal data simple to do, can we encourage this at different points in the calendar year and is the wording of any questions around this fit for purpose?
- Do we want to set targets / milestones in relation to this thematic?

END

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Our People - Inclusivity Programme Modules – Jan – March 2025



Our People - Inclusivity Programme Modules – Jan – March 2025

Focus On...
Stammering

Focus on...Equality, Justice
and Racial Disparity

Active Bystander Training

Ethical Dilemmas

Mentivity



Focus On... Stammering

External speaker

Virtual event

28th March

50 attendees

Focus on... Equality,
Justice and Racial
Disparity:
External Speaker

Hybrid event

13th Feb

58 in person
165 online

Active Bystander

Delivered In House

In person event

Jan- March
3 Events

47 attendees

Challenging scenarios
to discuss and debate

Delivered In House

In person event

Jan- March
2 events

18 attendees

Mentivity

External trainer

In person event

Jan – March
3 events

46 attendees

Stammering



Why did you attend this event?

- I was interested in the subject matter.
- To learn more about how to be inclusive for people who stammers.
- Develop greater understanding of disability issues.
- To learn more about people with a stammer and how to help them.
- I work in EDI so interesting to hear from this perspective.
- I had very little knowledge about the impact of stammering.
- Gain more knowledge as is part of the inclusivity programme.
- I was interested in understanding the perspective of someone with a stammer and how I could support them in the workplace.
- Fear of public speaking - This is an area I'm working on this year.
- Sounded interesting & I noted the speaker operates in the counter fraud world.
- As I have friends that stammer but have never received advice on how best to support them.
- To gain an insight into stammering. I always like to learn about people's differences.
- An extremely useful topic to understand in my current role.

What did you learn?

- How to communicate with those with stammer, avoid making assumptions such as saying 'take your time' etc.
- That it comes from childhood mostly, kindness and patience towards people who stammer.
- Never to ask people to take their time and don't always relate it to stress. Helps inform and future reasonable adjustments.
- I feel I learnt so much from this Focus on. Not speaking for someone with a stammer and telling them to 'calm down and breathe' is not helpful at all.
- Understanding of people who stammer and hopefully how to communicate better with them.
- Well presented course giving me a far greater understanding of stammering. Very detailed and interesting. Gained valuable knowledge.
- The practical tips Claire provided were useful - i.e. not to say to 'take your time', to consider whether we are recruiting for 'excellent communication skills' which may exclude those with a stammer who would be excellent in the role otherwise.



This event enabled individuals to open up about their own experience of stammering and a recording of the session was put on CityNet with over 90 views to date. We are currently working on a way of monitoring when people watch a recording.

Focus On... Equality, Justice and Racial Disparity

Page 48




Why did you attend this session?

- I think its vitally important to be aware and understand all viewpoints regarding equality, inclusion and diversity in the workplace as I do in every walk of life.
- To deepen my understanding of issues related to injustice, equality and fairness.
- To learn more about institutional racism, is it still happening? How I can see the signs and make positive changes.
- Interested as someone that has experienced and unsuccessfully challenged discrimination and victimisation.
- Based on Lawrence's credentials I had a feeling that this would be a good session.
- I wanted to listen to the speaker as he was renowned and is a specialist in his field.
- Increase my understanding of EDI and where I might be able to support.
- To be aware of the latest information involving policing.
- Saw it advertised on the intranet and also encouraged by the departmental head.
- The subject matter interested me and it's always good to hear from external speakers
- Wanted to learn a thing or two.
- I enjoy the Focus On sessions and this one sounded interesting too.

What did you learn?

- There is a need (possibly more than ever) to challenge bias.
- That there is still much to be done in creating a fairer/more equitable workplace.
- Reality of what is going on, how to pick up on this and raise awareness.
- That there are still examples of blatant discrimination in the police service - I will challenge discrimination in CoLP if I witness it - so far, I have not personally witnessed anything and I hope this continues .
- A more holistic understanding of the issues around Equality, Justice and Racial Disparity .
- He talked about many things I just did not know about. For example, the Birmingham City Council case. I will use what I learn't with colleagues who missed this incredible talk.
- Lawrence gave an interesting perspective about racism and discrimination in the workplace and how statistics can show trends about institutional racism and gave a bit more credence to the term.



This event received both positive and negative feedback due to the nature of the subject matter. We put the recording onto City Net with a message from our BPA Network and PSD Department advocating the importance of the message conveyed by the speaker in delivering our EDI Strategy.

Active Bystander



Why did you attend this session?

Individuals responded to this questions mainly saying that it was a requirement of their PDR or their Line Manager had asked them to attend.

What did you learn

Connect vs correct, intervention earlier or later, factors that may inhibit intervention including those out of our control, such as tiredness and schedule. Interesting case studies that were not straightforward. Videos illustrating. Biggest take away for me was an initial intervention doesn't need to be remotely confrontational. It can be done

from 'as a friend' point of view, to minimise any defensiveness and maximise reflection.

The examples provided and the case studies discussed with the group to see how would people react.

It enabled learners to think critically about the consequences of action or inaction.

Really got to know the true meaning of what a bystander is and how we can proactively call out bad behaviour at the start. It also showed the importance.

The content was fascinating, and made you really think about your own mindset regarding this subject.

I think it's important that City Police continue to take seriously its desire to change the culture of the organisation

by rolling out training & awareness such as this. Culture will only change if the message is continuously drip fed and further embedded.

The subject is thought provoking and challenges my behaviour

It is relevant to working environment and illustrates how to deal with inappropriate behaviours/comments from others.

Has given me more confidence to approach situations whereby i may need to advise people that their comments are not acceptable.

intervening when colleagues require you to do so.

We have delivered Active Bystander to over 400 Officers and Staff to date. We will review the content and impact during the next quarter and plan for revised delivery in the Autumn.

Ethical Dilemmas



Why did you attend this session?

- To learn about ethical dilemmas in a management perspective.
- This is a very important issue.
- Important to be an ethical leader in policing.
- I saw it as an opportunity to become a better line manager.
- Appealing topic, looking for inclusion programme module.
- To improve my problem / issue sorting skills.
- To gain a better understanding of ethics in the workplace.
- Previous involvement in the London ethics panel as an associate
- Understand mindset.
- For more awareness – want to be a good manager.
- To assist with my decision making and to have an MOT to ensure I am consistent.
- To learn as an individual and as a manager.
- Very interesting area and completely relevant to my area of business.
- I was Intrigued and wanted to get a better understanding of ethics and the dilemmas. Understand the views.
- I thought it would be a good session to assist me managing my team.

What did you learn?

- To keep an open mind, always.
- Remain open minded.
- Need to understand better over people's needs and adjustments and help them to achieve.
- To challenge my thinking and slow down my thought process. Be more of empathetic listener
- To have open honest conversations and listen effectively.
- To consider different perspectives, never make assumptions, always check viewpoints and how to navigate issues better.
- Consider different viewpoints and manage discussions as a Manager, maintaining objectivity.
- Some of the models, active listening, ladder of inference , useful for self-awareness.
- Listening continuum by Stephen Covey.
- Active listening techniques and the ladder of inference was very useful.
- To open discussion and content.


We targeted Middle Managers with the first cohorts. We will review content and impact during the next quarter whilst continuing to delivery to middle managers.

Why did you attend this session?

Individuals responded to this questions mainly saying that it was a requirement of their PDR or their Line Manager had asked them to attend

What did you learn?

- I thought the information provided by Sayce was very thorough and his passion for Mentivity was evident when presenting us with all the information. He was a great speaker in turn made the course so interesting and was something that was very applicable to day-to-day life, and I believe it is very important for people to learn what he was showcasing
- Sayce was engaging and dynamic, a true inspiration and someone we can all learn from and aspire to be more like him. It was thought provoking throughout, and the inclusion of the historical elements were interesting.
- The way in which Sayce delivered the presentation. He is a very inspirational person, and this comes across in the way he talks about his experiences and how he helps others. I've read and watched programmes before, but it really made me think about the history and struggles people have had to and continue to endure, even currently. Very thought provoking and interesting for me. Also, a very chilled session, felt very comfortable to speak on what can be an awkward subject
- The historical aspect of the subject matter, getting to the core of it. I liked the interaction as well.
- The class interaction and experience people have had whether as police officer or police staff and whether in their personal life or in work
- Awareness on Racism, discrimination and History of the police force and how it has handy issue like racism in the past
- The balance of information and engagement throughout. It was so well designed, including times of unnecessary uncomfortability, i.e. the need to reflect and challenge our own thoughts, actions and whether we are indeed actively learning and being allies
- Inspiring, engaging and current. An input that connects you to community views that provides constructive challenge to perceptions and views.
- Not had such quality content on impact of policing on young black communities in the time I have been in the job (20 years plus). I think use of external trainers that represent, come from communities delivers impact that College of Policing NCALT packages never can. This is exactly what we need when policing is in a trust and confidence crisis



These sessions have been delivered to our Student cohorts for the past two years and continue. They have been delivered to both Police Officers and Staff through the IP programme and we will focus on delivering to our TaskForce in 2025 excluding those that received it as student officers.

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Appendix 4 – EDI Performance Framework

Area	Commitments	Action Ref	Actions	Team owner	Priority	25/26	Status
OUR PEOPLE	1.Senior leaders accountability pledges	1.1	Write and announce pledges	ICOD	High	YES	In progress
		1.2	ICOD to review pledges	ICOD	Medium	NO	In progress
		1.3	Monitor pledge compliance as standard EDI Strat Board item	ICOD	Medium	NO	In progress
		1.4	Formalise Staff Network 'Champion' roles with set objectives, on which held accountable and evaluated	ICOD	Medium	NO	Not started
	2.Increased diversity of under-represented talent	2.1	Creation and delivery of recruitment strategy	HR	High	YES	In progress
		2.2	Delivery and Evaluation of Positive Action Learning Scheme	ICOD	High	YES	In progress
		2.3	Delivery of Insights programme	ICOD	Medium	NO	In progress
		2.4	Delivery and Evaluation of Sponsorship Scheme	ICOD	High	YES	In progress
		2.5	Ensure diverse groups access to leadership programmes	L&D	Low	NO	Not started
		2.6	Evaluation of existing programmes for our diverse groups	ICOD	Medium	NO	Not started
		2.7	Creation of Retention and Exiting Workgroup (with programme of work in place)	NLF	High	YES	Completed
		2.8	Delivery against statutory requirements (including PSED)	ICOD	High	YES	In progress
		2.9	Ensure ability to update diversity data for all staff	COMMS	High	YES	In progress
		2.1	Monitoring of recruitment, promotion and retention data	HR	High	YES	In progress
		2.11	Inclusion of 'attraction' data	HR	Low	NO	Not started
		2.12	Plan created to address poor disclosure rates relating to protected characteristics	NLF	Medium	NO	In progress
		2.13	Career aspirations for underrepresented groups- barriers & opportunities	HR	Low	NO	Not started
	3.Regular mandatory education on cultures and lived experiences	3.1	Creation of 'Inclusivity Programme' as mandatory for all	ICOD	High	YES	Completed
		3.2	Creation of EDI calendar to inform activity	ICOD	High	YES	Completed
		3.3	Review of internal approach to engagement and creation of strategy (including intranet revamp)	ICOD	High	YES	Not started
		3.4	Ongoing delivery of content and consistent evaluation	ICOD	High	YES	In progress
		3.5	Sophisticated evaluation plan in place to ensure 'impact' is measured	ICOD	High	YES	In progress
		3.6	Increase staff participation in the Inclusivity Programme	ICOD	Medium	NO	In progress
		3.7	Evaluate impact of events organised by staff networks	ICOD	Low	NO	Not started
	4. All leaders to complete mandatory and regular	4.1	Content and Timetable for leadership training to be agreed	L&D	High	YES	In progress
		4.2	Ongoing delivery of staff survey	ICOD	High	YES	In progress

Appendix 4 – EDI Performance Framework

Page 54	inclusive leadership training.	4.3	Ongoing training evaluation and monitoring of effectiveness, to link in with SLT pledges	ICOD	Medium	NO	Not started
		4.4	Review of staff survey to be undertaken to capture effectiveness	ICOD	Low	NO	Not started
		4.5	Exeter Programme	ICOD	Medium	NO	Not started
		4.6	Ensuring our SLT are attending Inclusivity Programme modules	COT	Low	NO	Not started
	5. Force wide Inclusivity objectives into PDRs	5.1	Communicate mandatory EDI PDR objective	COMMS	High	YES	In progress
		5.2	EDI objective compliance to be monitored / reported / individuals held accountable	HR	Medium	NO	Not started
		5.3	Reward / recognise efforts made by active SNA members and Executive Officers	ICOD	Medium	NO	Not started
	6. Monitor PSD complaints and feedback, addressing in timely manner and with empathy	6.1	Write paper on current position, highlighting gaps, making recommendations	PSD	Low	NO	Not started
	7. Completion of cultural audits	7.1	A cultural audit process to be designed and agreed, pilot undertaken	ICOD	High	YES	In progress
		7.2	Reporting on pilot to agree on effectiveness and next steps	ICOD	High	YES	In progress
		7.3	Review of reporting on culture to take place- including 'low level complaints	ICOD	Medium	NO	Not started
		7.4	Capturing feedback on culture (inform IP modules and OLF)	ICOD	Medium	NO	Not started
	8. We will embed recommendations from all EDI national policing plans and ensure expected high standards are met	8.1	Benchmarking exercise re National Plans	ICOD	Low	NO	Not started
		8.2	Review of National plans to embed recommendations within own EDI frameworks	ICOD	Low	NO	Not started
OUR POLICIES	9. Establish partnership standards	9.1	Benchmarking / external consultancy to identify good 'partnership standards'	CSD	Low	NO	Not started
		9.2	Decide on ownership and process for public feedback	CSD	Low	NO	Not started
		9.3	Communicate internally with requisite governance in place for monitoring (i.e. via OLF)	CSD	Low	NO	Not started
	10. Ensure effectiveness of our IASG and YIASG	10.1	Add this topic to the meeting agenda for consultancy	ICOD	Low	NO	Not started
		10.2	Create plan to monitor influence and impact	ICOD	Low	NO	Not started
		11.1	Complete review of SNAs	ICOD	High	YES	Completed

Appendix 4 – EDI Performance Framework

OUR PUBLIC	11. Best use of Staff Networks in delivering our policies.	11.2	Identify relevant policies and owners, putting plan in place to review through EDI lens	ICOD	Medium	NO	Not started
		11.3	Undertake review and ensure effective monitoring via EDI Strategic Board	ICOD	Medium	NO	Not started
		11.4	Conduct an EIA on rank and pay criteria	ICOD	Low	NO	Not started
		11.5	Review policies relating to bullying, harassment and grievances PLUS ensure training on this available	PSD	Low	NO	Not started
		11.6	Review of Equal Opportunities Policy	ICOD	High	YES	Not started
	12. Progression of talent	12.1	Review of previous talent strategy and implementation of new one	HR	Low	NO	Not started
		12.2	Review current training offering and ensure talent management included	L&D	Low	NO	Not started
	13. Engagement with youth	13.1	Youth IASG to be refreshed	ICOD	High	YES	In progress
		13.2	Programme of engagement with young people to be led by LP and ICOD (Princes Trust)	LP	Medium	NO	In progress
		13.3	Programme of police cadet activity to be promoted and monitored	LP	Medium	NO	In progress
		13.4	Evaluation and impact measurement	ICOD	Low	NO	Not started
	14. Implementation of victim satisfaction surveys	14.1	Review of existing victim satisfaction survey and metrics	CSD	Medium	NO	Not started
		14.2	Conduct external review to ensure EDI captured within our surveys	CSD	Low	NO	Not started
		14.3	Report findings both internally and externally	CSD	Low	NO	Not started
	15. Ensure EDI National plans are embedded in our policing activities	15.1	A review to take place of all National plans to ensure adequate capture	ICOD	High	YES	Not started
		15.2	Clear ownership and reporting mechanisms agreed	ICOD	High	YES	Not started
		15.3	Ongoing actioning and monitoring of National VAWG Plan via internal governance and external assessment		High	YES	In progress
		15.4	Ongoing actioning and monitoring of National Police Race Action Plan via internal governance and external assessment	ICOD	High	YES	In progress
		15.5	Ongoing actioning and monitoring of BDF Action Plan	ICOD	High	YES	In progress
		15.6	Ensuring embedded throughout activity as part of IE standard	ICOD	Low	NO	Not started
	16. Accessible engagement with communities	16.1	Review of existing engagement methods	CSD	Low	NO	Not started
		16.2	Recommendations to follow review	CSD	Low	NO	Not started
		16.3	Independent scrutiny of engagement plan	CSD	Low	NO	Not started
	17. Ensure robust complaints processes and effective response	17.1	Review of existing complaints process to take place and recommendations to follow	PSD	Low	NO	Not started

Appendix 4 – EDI Performance Framework

OUR PARTNERS	18. Measure and Review our Partnership Work	18.1	Review of existing partnerships to take place to establish 'as is' position	ICOD	High	YES	In progress
	19. Proactively recruit diverse partners to supply chain	19.1	Review of existing framework	CSD	Medium	NO	Not started
		19.2	Work with stakeholders to identify best practice and build plan	CSD	Low	NO	Not started
	20. Facilitate opportunities to proactively bring diverse suppliers	20.1	Establish supplier baseline via review	CSD	Low	NO	Not started
		20.2	Create plan to maximise opportunities for future ethical partnerships	CSD	Low	NO	Not started
	21. Build on efforts and create governance / testing ground	21.1	Creation of Ethics Committee	ICOD	High	YES	In progress

City of London Corporation Committee Report

Committee(s): Professional Standards and Integrity Committee – For Information	Dated: 03 June 2025
Subject: Professional standards, conduct, and vetting Update Q4	Public report: For Information
This proposal: <ul style="list-style-type: none"> • 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 remained identical in Q4 in comparison to Q3 (same number logged). There have been 9 new Conduct Cases recorded this quarter.
- There remains a number of officers subject to long-term suspension. Many relate to misconduct cases held sub-judice awaiting for results of long impending criminal investigations or trials. Some of these cases have now concluded and translate through to Misconduct Hearings over coming months.
- Progress across the Vetting Action Plan has seen a shift in completed recommendations from 56% last quarter to 69% this quarter.
- New Vetting Regulations will now enable police forces to dismiss officers who are unable to meet the vetting requirement for the role.

Recommendations

Members are asked to:

- Note the report.

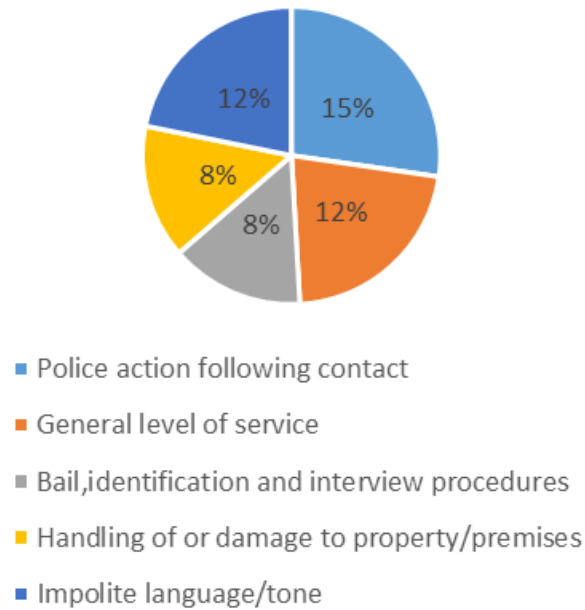
Main Report

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

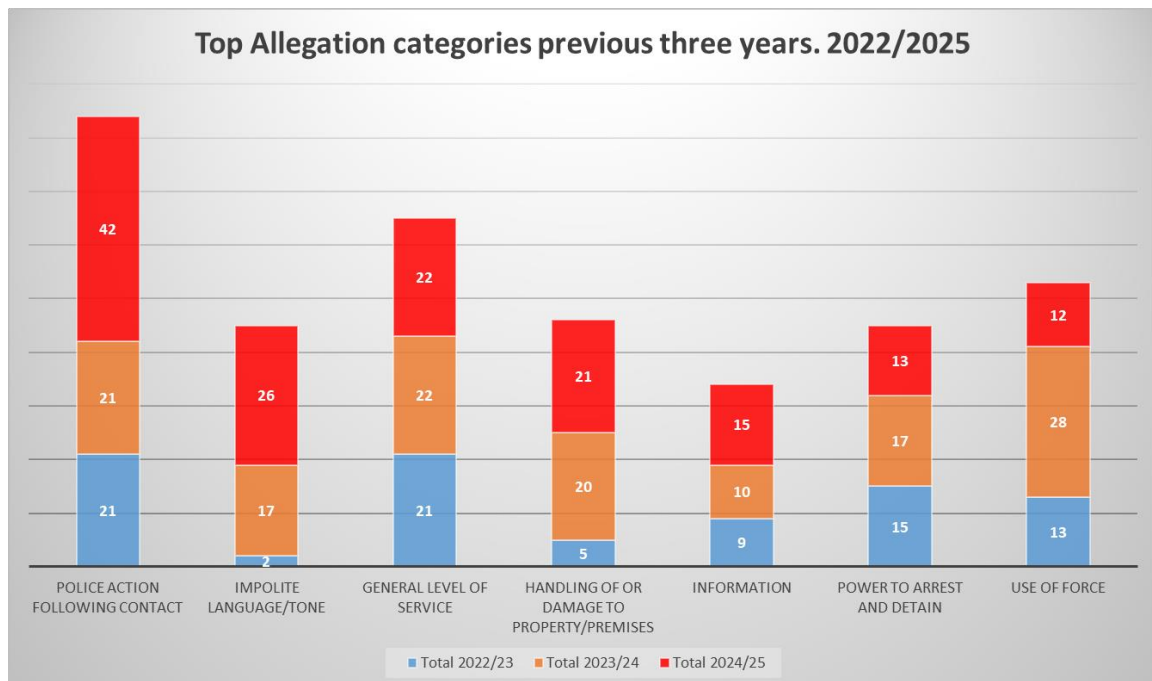
- **Complaint volumes, content, and performance –**

1. This document contains the statistics prepared by the Professional Standards Directorate for the fourth quarter of 2024/25 (Jan-March).
2. This quarter the total number of CoLP complaint cases logged is 41.
3. This is separated into 14 dealt with under Schedule 3 of the Police Reform Act 2002 and 27 not within Schedule 3. This figure of 41 complaints is the same volume compared against Q3 where a total of 41 complaints were logged; 4 under Schedule 3, and 37 not within Schedule 3. Compared against the same period (Q4) last year 2023/24 the total number of CoLP complaint cases logged was 53. (11 Schedule 3 and 42 not within Schedule 3).
4. Of the 89 allegations recorded during Q4 2024/25 the highest number were in the categories of: Police action following contact (13) General level of service (11) Impolite language and tone (11) Handling of/or damage to property/premises (7) Bail, identification and interview procedures (7)
5. This is an increase in allegations recorded against Q3 of 19 (27%).
6. Q4 has 4 out of 5 highest allegation type categories featured in the overall 'Top 5 allegation types' against the full year 2024/25 data which are: General level of service, Police Action following contact, Impolite language and Tone, and Handling of or damage to property.
7. Allegation types General level of service and Police action following contact have been in the top 5 allegation types for the previous three years.

Q4 Top Allegations 2024/25



8. The allegation type 'Police action following contact' remains the highest allegation type across annual (2022/22, 2023/24, 2024/25) and quarterly data. The graph below visually represents the highest allegation types over the previous three years. Use of Force and Power to arrest and detain have both dropped out of the top five this year.



9. The data and trend narrative are 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.

Q4 – Data examination: -

10. Analysis of the highest allegation categories (the latest Q4 is compared against both the previous quarter(s) and the total years (2024/25) (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 Handling of or damage to property (C) 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 Q4 37% Organisational type allegations were recorded (Q3 = 34%)
11. The total number of allegations finalised during Q4 is 66 compared to 69 in the previous quarter.
12. Of the 66 allegations finalised:
 - 33 Resolved
 - 18 Service provided was acceptable
 - 1 Service Not acceptable
 - 11 Not resolved/No further action
 - 1 No further action
 - 2 Withdrawn
13. The one allegation finalised where the Service provided was NOT acceptable relates to one case. Allegation type – information.
14. During 2024/25 there have been a total of 11 allegations (5% of all allegations finalised) where service has NOT been acceptable. These relate to 10 cases (7% of total cases finalised). One case had two allegations – Police action following contact and Information. The officer had failed to respond to the complainant and failed to provide the relevant department with the information once received. The officer received reflective practice.
15. To note, cases often contain more than one allegation; the number of cases finalised in Q4 is 35, compared to 45 finalised in Q3.
16. Of the cases finalised 10 were logged as Schedule 3, and 25 were not under Schedule 3. There were no cases finalised under the previous regulations.

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

17. During this quarter, 9 conduct investigations were recorded, and 5 investigations were finalised. There are currently 36 live conduct investigations, of which 18 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. In total 5 Conduct matters have been finalised: 3 cases – No case to answer /No action. 1 case – Case to answer – Misconduct meeting – written warning, and 1 case discontinued – no action.
19. One Misconduct Hearing took place during Q4, the officer was found to have breached Confidentiality and Authority, Respect and Courtesy (gross misconduct) and was dismissed without notice. The officer has been placed onto the barred list.

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

20. PSD Protect: This programme continues to be delivered with the key focus last quarter on new joiner and leadership inputs from PSD. A look ahead will see a greater focus on:
 - Structured de-briefs to teams affected by colleagues dismissed through misconduct processes. The objective being to myth-bust PSD processes and ensure that any organisational learning is delivered directly.
 - Week of 'Focus On' and engagement events targeted at specific PSD themes.

Vetting:

21. New measures laid in Parliament mean that passing vetting will become a legal requirement for all serving officers. These measures will come into effect through new Vetting Regulations on 14 May 2025. The requirement for Vetting Regulations became notable following the High Court's ruling in the Sgt di Maria case which revealed a significant gap in the existing conduct framework, leaving police forces unable to remove officers whose vetting had been withdrawn.

The Regulations will provide a fair and clear process for reviewing vetting decisions and, where needed, remove officers who no longer meet the standards the public rightly expects.

22. The continuous improvement Action Plan for Vetting established in summer 2024 maintains to progress, with tangible improvements relating to productivity and service delivery. Currently, 78% of the actions set have been completed, and 22% are in

progress. All actions assessed as either 'very high' or 'high' in priority are part of the completed or in progress categories.

The majority of the actions outstanding relate to the ability for HR and Vetting systems to interface. The current HR system does not have this functionality, however some manual workarounds are being implemented, for example, employees having access to a vetting self-service tab on their HR file to check their own vetting level and expiry date.

Overview of Action Plan:

Actions	RAG Rating				Total
	Very High	High	Medium	Low	
Number of Actions	3	21	12	4	40
% of Total	7%	53%	30%	10%	100%
Completed	1	18	9	3	31 (78%)
In Progress	2	2	4	1	9 (22%)
Not Started	-	-	-	-	0

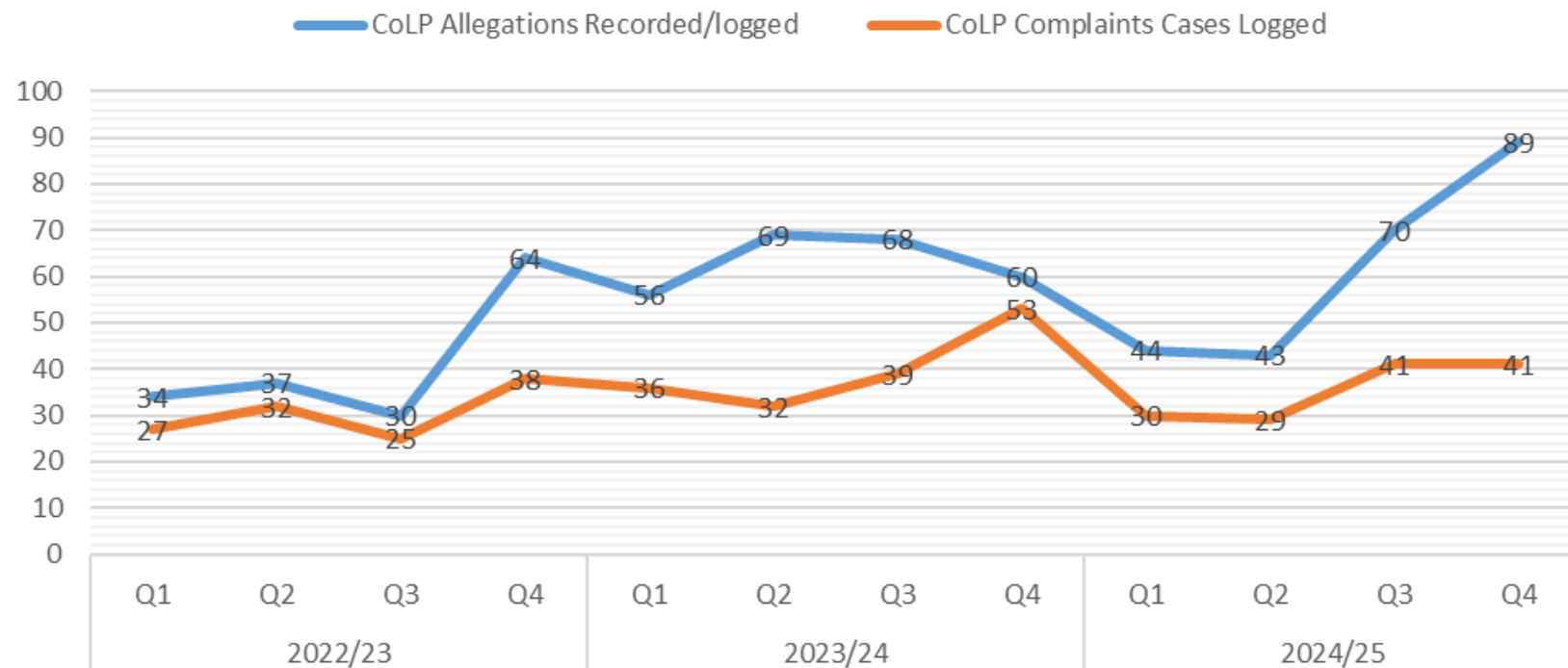
II. Forward look

23. The new Vetting Authorised Professional Practice (APP) launched in December 2024, the College of Policing published the new Vetting APP. All of these changes are embedded into current processes, with a small number working through implementation. An example being annual integrity reviews, this process has been designed and will begin roll-out this quarter.

24. Home Office Police Dismissals Review: The anticipated 'go live' date remains spring/summer 2025 with a focus on:

- Presumption for dismissal when Gross Misconduct identified.
- Accelerated hearings for former officers
- Performance regulations to be reformed.

City of London Complaint Data



	Summary of public complaints data – Q4 2024/25					
Metric	Current quarter (Q4)	Previous quarter (Q3)	Previous year (Q4)	(%) change (Q on Q)	(%) change (Y on Y)	Comment
Complaints – Schedule 3	14	4	11	250%	27%	A total of 41 cases were logged in Q4 2024/25. This is the same as Q3 2024/25
Complaints – not Schedule 3	27	37	42	27%	36%	The average number of cases logged over the previous 5 quarters is 39 per quarter, Q4 is above average.
Allegations	89	70	60	27%	48%	There were 89 allegations recorded in Q4 2024/25. This is an increase of 19 allegations from Q3 2024/25 The average number of allegations over the previous 5 quarters is 61 per quarter. Q4 is above average.
Average time to log complaints (days)	N/K (await IOPC)	2	3	%	%	<i>Timeliness is taken from IOPC published</i>

	bulletin Q4)					bulletins and available retrospectively, unavailable dataset from Centurion.
Average time to contact complainant (days)	N/K	3	11	%	%	
Complaints finalised – Schedule 3	10	9	27	11%	63%	
Complaints finalised - not Schedule 3	25	36	56	31%	55%	
Average time to finalise complaint cases (days) – Schedule 3 (NOT including subjudice cases)	N/K	112 (Q3 YTD)	150 (Q4 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	42	84	%	%	Q4 2024/25 is not yet published at time of writing
Applications for review sent to local policing body	N/K	2	1	%	%	
Applications for review sent to IOPC	N/K	1	5	%	%	
	Nature of allegations – Of the 89 allegations recorded during Q4 2024/25 the highest number were in the categories of Police Action following contact (13) General level of service (11) Impolite language / tone (11) Handling of/or damage to property (7) Bail, Identification & interview (7)					

This is an increase in allegations recorded against Q3 of 19

Allegation types: The top five allegation types at the end of 2024/25 are as follows:-

Police action following contact 17%

Impolite language / tone 11%

General level of service 9%

Handling of or damage to property/premises 9%

Information 6%

Q4 2024/25 contains 4 out of the above top allegation types. Police action following contact remains the highest allegation category and equates for 15% of all allegations logged.

Power to arrest and detain and Use of Force have both dropped out of the top allegations at the end of the 2024/25 data. General level of Service and Police action following contact have featured in the annual top 5 data 2022/23, 2023/24 and 2024/25.

Ethnicity and discriminatory behaviour –

38% of complainant's ethnicity is recorded as Unknown and 9% 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.

Since January 2025, the complaints team have been piloting a new EDI link. This link is sent to complainants to explain the importance of why we collect ethnicity data. Unfortunately this has also had a low response rate (4 responses).

There were three allegations (within 3 cases - 2 Non-schedule 3 and 1 Schedule 3) of Discriminatory Behaviour logged during this reporting period. (All Race allegations)

Summary of internal conduct cases and investigations– Q4 2024/25				
Metric	Number	Previous quarter (Q3)	# (%) change (Q on Q)	Comment
New conduct investigations recorded	9	0	900%	
Total live conduct investigations	36	31	16%	Total live cases of which a number are sub-judice
<i>o.w. gross misconduct</i>	18	25	28%	
Conduct investigations finalised	5	1	400%	
Investigations finalised within <30 days	5	0	500%	
Officers and staff on suspension	11	16	31%	Includes officer under IOPC investigation
Officers and staff on restricted duties	5	7	29%	Includes officer under IOPC investigation
IOPC independent investigations	5	5	no change %	Includes Westminster attack
	<p><u>Accelerated misconduct meetings held Q4 – None</u></p> <p><u>Misconduct meetings / hearings held Q4</u></p> <p><u>Misconduct Hearing</u> - Case to answer - Breach types - Authority respect and courtesy - Confidentiality. Gross misconduct outcome was reached, the officer was dismissed and placed on barred list.</p> <p><u>Misconduct meeting</u> - Case to answer - breach types - Orders & Instructions and Duties & Responsibilities - Outcome - Written Warning.</p>			

Conclusion

25. In conclusion, the data presented highlights notable trends and developments within complaints, conduct investigations, and the progress of the Professional Standards Directorate (PSD) during both Q4 and 2024/25 overall. Comparative data against 2023/24 to 2024/25 shows a reduction on complaint data of 12% cases logged. Allegations logged a 3% reduction. This would indicate that whilst complaints have reduced overall, there are more allegations within the cases so an indication of complexity to investigate.
26. Allegations of “Use of Force” have remained key focus areas for improvement and the delivery of Public & Personal safety training (PPST) within a Force dedicated bespoke facility over two days mandatory training since April 2024 has seen this improvement. New conduct cases have returned this quarter, and ongoing sub-judice misconduct cases signal potential increases in misconduct hearings as legal proceedings conclude.
27. Vetting operational delivery has continued to improve as outlined in the Vetting Action Plan (para 22). Implementation of regulatory changes will continue to be the focus of next quarter.

Report Authors

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

<u>Item Type</u>	<u>Hospitality Item</u>	<u>Location type</u>	<u>Directorate</u>	<u>Date</u>	<u>Estimated Value</u>	<u>CoLP Participant(s)</u>	<u>External Organisation</u>	<u>Full description of Gift/Hospitality</u>	<u>Location details</u>	<u>Line Manager Comments</u>	<u>Rationale</u>
Hospitality Item	Reception	Guildhall/Mansion House	Chief Officer Team	18/03/2025	25	Pete O'Doherty	City of London Corporation/HAC	A Service of Evensong followed by an early evening reception to mark the 100th Anniversary of the Pikemen and Musketeers.			Offered as part of Cmsr role to attend City functions, declined due to prior commitment.
Hospitality Item	Dinner	Livery Hall	Chief Officer Team	05/03/2025	100	Pete O'Doherty	Grocers' Company	The Court & Livery City Dinner			Offered as part of Commissioner role to attend Livery Company functions, declined due to prior commitment.
Hospitality Item	Dinner and Awards Ceremony	Concert hall/arena /cinema	National Lead Force Operations	01/03/2025	350	Gary Robinson	British Phonographic Institute	A roundtable discussion over dinner prior to the awards starting and then remain for the duration. Present on the table which is hosted by the British Phonographic Institute will be representatives from Google, Apple, the IPO, Sony, Kings Counsel.	Intercontinental Hotel and O2 Arena		The aim is to build partnerships across the industry and wider IP sector to ensure we use resources efficiently and work together to find solutions to major challenges we face including AI, criminal use of platforms and the expanding threat of Counterfeiting within the music industry. CoLP and PIPCU are a key element to all of this.

Hospitality Item	Dinner	Livery Hall	Chief Officer Team	27/02 /2025	100	Pete O'Doherty	The Leathersellers ' Company	Dinner in honour of the Armed Services			Offered as part of role to attend Livery Company dinners, declined due to prior appointment.
Hospitality Item	Lunch	Restaurant	Chief Officer Team	11/02 /2025	25	Pete O'Doherty	IBM	Working lunch with stakeholder who paid the bill, to decline would cause offence.			Working lunch with stakeholder who paid the bill, to decline would cause offence. Bill not obtained to attach.
Hospitality Item	Dinner	Museum/ Gallery/C ultural	Chief Officer Team	06/02 /2025	100	Pete O'Doherty	City of London Corporation	Chairman of the Audit and Risk Management Committee dinner			Offered as part of role to attend Corporation Committee functions, declined due to prior commitment.
Hospitality Item	Dinner	Concert hall/arena /cinema	Chief Officer Team	06/02 /2025	100	Pete O'Doherty	Barbican Centre	BARBICAN CENTRE ANNUAL DINNER, arts exhibition and drinks reception.			Offered as part of Commissioner role to attend City functions, declined due to previous commitment.
Hospitality Item	Dinner	Livery Hall	Chief Officer Team	06/02 /2025	100	Pete O'Doherty	Ironmongers' Company	The Ironmongers' Company's City Dinner			Part of role of Commissioner to attend Livery Company functions, accepted on that basis.
Hospitality Item	Lunch	Restaurant	Corporate Services	27/01 /2025	25	Patrick Holdaway	BP - Iona Blake - retail loss prevention lead for the UK.	Business meeting with a colleague who was from out of the area who I met for lunch. The discussion involved various joint workstreams around retail crime.	Fish! Borough Market, London		I have long term business relationship with this person and lunch suited their needs whilst in London.

Hospitality Item	Dried Thai fish fillets given as a Christmas gift	Guildhall/ Mansion House	National Lead Force Operations	24/01 /2025	5	Chris Saunders	Victim from Operation Cassady	Dried Thai fish fillets given as a Christmas gift	GYE 1st floor	Chris Received this gift	This was given as a Christmas gift
Gift Item	No	Emergency Services Premises	Specialist Operations	22/01 /2025	100	David Jarvis	IP House. www.ip-house.com	Counterfeit clothing seized and earmarked for destruction.	None		<p>The offer has come from a former Colp Detective Sergeant, Andrew Masterson, who has left and now works for a company that deals with Intellectual Property and Counterfeit Goods.</p> <p>As a former Police medic. He knows that the TRT/Firearms Medic Instructor team use old clothing to add realism in refreshers and initial courses. This clothing is cut off of mannequins and live role players, to simulate how a casualty's condition is assessed and treated in an extreme emergency trauma situation.</p> <p>The vast majority of the time, the clothing used in training is cut across the main body and arms/legs making it impossible to reuse. Trousers get pulled down on a semi regular basis but all sessions already include scenarios where total destruction of clothing is achieved.</p> <p>Due to the high frequency of training, it is not unusual to go through 6-8 sets of clothes every day a course is run.</p> <p>Repeated requests for second hand clothing to officers and staff have a limited return and donations often lack diversity.</p>

											<p>The company that has made the offer destroys or recycles the textile goods that are seized. They have mentioned wanting to publicise a donation of clothing for the purpose of life saving training.</p> <p>To stop unauthorised private use, all clothing received will be marked on the logo's or motifs with fabric markers and the main bodies marked or stained in an obvious and undesirable fashion.</p> <p>The clothing, being seized and intended for recycling, is arguably not worth its counterfeit designer value and if you agree, should be judged far lower. Previously, charity shops have agreed to supply clothing that they cannot sell for £1 per item. This is why i have valued it at £100 I have asked for around 100 items</p>
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Gift Item	Alcohol & chocolate	Emergency Services Premises	Specialist Operations	20/01 /2025	60	Matthew Clapham	Kosuke Saito, Police Inspector, National Police Agency Japan	1 x Bottle of Japanese Sake 1 x Model police car 1 x Mixed selection of chocolates	Bishopsgate Police Station		<p>Declaring officer is part of the International Police Association & the visitor today is also a part of this,</p> <p>The IPA is professional organisation whereby police from around the world, become in contact form professional working partnerships and embrace the motto of "service through friendship"</p> <p>Today declaring officers visitor was in the UK & as part of this declaring officer, made arrangements to meet this individual and discuss policing in the UK & Japan at Bishopsgate police station</p> <p>The gift was not expected as when usually meeting other officers, low level gifts such as force promotional merchandise are gifted rather than items such as this,</p>
Hospitality Item	Reception	Civic building	Chief Officer Team	20/01 /2025	25	Pete O'Doherty	Mayor of London	Holocaust Memorial Day service followed by light refreshments	City Hall		Offered as part of role of Commissioner, declined due to a prior commitment.
Hospitality Item	Reception	Livery Hall	Chief Officer Team	10/01 /2025	25	Pete O'Doherty	St Michael Cornhill	Annual City New Year Service followed by a reception			Commissioner is expected to be invited to such City events, declined due to prior engagement.

Hospitality Item	Dinner	Guildhall/ Mansion House	Chief Officer Team	09/01/2025	100	Pete O'Doherty	The Lord Mayor	The London Government Dinner - held since 1962, invitees to representative bodies concerned with the government and administration of London.			Offered as part of role to attend the Lord Mayor's functions, accepted on that basis.
Gift Item	1x hoodie and 1x training top	Hotel	Chief Officer Team	08/01/2025	60	Paul Betts	GB Womens Police Management Team	Attended the Police Sport UK GB Women's football event and received a hoodie and training top as a thank you.	Champney, Springs, Ashby de la Zouch	Reviewed and approved	Attended on behalf of the COT, as we had a number of officers who are part of the GB Police Womens Football team and were playing this international game against Hungary. Attended to show support to not only our team members but also as support to the tournament. To decline would be to cause offence.
Hospitality Item	x2 tickets to Care of Police Survivors charity event on 1st Feb 2025	Museum/ Gallery/Cultural	Professionalism and Trust	02/01/2025	160	Carly Humphreys	Niche	Fund raising event for a charity which supports the families of police officers and staff that die on duty.	National Memorial Arboretum in Staffordshire	Request is approved.	These tickets were given to me by Niche who is a corporate sponsor of the GB Womens Police football team as they had additional tickets they no longer required. One ticket accepted (£80 each) and £80 for additional ticket purchased to be donated to the charity on the night.

Appendix 2 - PUBLIC

Chief Officer Team (COT) Membership of Groups

Quarter 4

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

<u>Ref no</u>	<u>Date logged</u>	<u>Rank</u>	<u>Officer declaring</u>	<u>External Organisation</u>	<u>Role/Position held</u>
1	18/11/2023	Temp Commander / DCS	Oliver Shaw	Fraud Advisory Panel (FAP)	Sit on the board of Trustees as CoLP's representative (FAP is a registered charity)
2	18/11/2023	Temp Commander / DCS	Oliver Shaw	Paddington Farm Trust (PFT).	Sit on the board of Trustees (PFT is a registered charity)
3	18/01/2024	Temp Commander / DCS	Andrew Gould	Member of the Institute of Directors	Member
4	18/01/2024	Temp Commander / DCS	Andrew Gould	ISC2 (cyber security accreditation organisation)	Member
5	18/01/2024	Temp Commander / DCS	Andrew Gould	National Cyber Resilience Centre Group and London Cyber Resilience Centre Group	Non-executive Director
6	18/01/2024	Deputy Commissioner	Nik Adams	National Cyber Resilience Centre Group and London Cyber Resilience Centre	Non-Exec Director

7	17/05/2024	Commissioner	Pete O'Doherty	National Cyber Resilience Centre Group	Non-Exec Director
8	17/05/2024	Commissioner	Pete O'Doherty	Worshipful Company of Security Professionals Honorary Freeman	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	National Cyber Resilience Centre Group	Non-Exec Director
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

City of London Corporation Committee Report

Committee(s): Professional Standards and Integrity Committee	Dated: 03 June 2025
Subject: Summary of Action Fraud public complaints data – Q4 2024/25	Public report: For Information
This proposal: <ul style="list-style-type: none"> 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 4, Action Fraud recorded 141,020 reports on the National Fraud Database (94,404 crime reports and 46,616 Information reports). The complaint figures (total) represent 0.08% of the total number of Action Fraud reports recorded in Q4.

A total of 114 cases were logged in Q4 2024/25 overall increase of 1 case from Q3 2024/25 (0.8%). There were 144 allegations recorded in Q4 2024/25. This is an increase of 25 allegations from Q3 2024/25 (21%).

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 – Q4 2024/25

Carly Humphreys

Detective Superintendent Carly Humphreys
Head of Professional Standards

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Appendix 1: Summary of Action Fraud public complaints data– Q4 2024/25				
Metric	Current quarter (Q4)	Previous quarter (Q3)	(%) change (Q on Q)	Comment
Complaints – Schedule 3	2	1	100%	<p>A total of 114 cases were logged in Q4 2024/25. This is an overall increase of 1 case from Q3 2024/25 (0.8%)</p> <p>The average number of cases logged over the previous 5 quarters is 106 per quarter, Q4 is above average.</p> <p>It has been identified not all complaints logged in the AF SUGAR system have been logged into the PSD (centurion database). This is being rectified¹.</p>
Complaints – not Schedule 3	112	112	No change%	
Allegations	144	119	21%	
Average time to log complaints (days)	N/A	7		<p>Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.</p>
Average time to contact complainant (days)	N/A	5		
Complaints finalised – Schedule 3	3	5	40%	<p>A total of 94 cases were finalised in Q4 2024/25. This is an overall decrease of 10 cases from Q3 2024/25 (10%)</p> <p>Average number of total cases finalised is 91 over the last 5 quarters. Q4 is therefore above average.</p>
Complaints finalised - not Schedule 3	91	99	8%	
Average time to finalise complaint cases (days) – Schedule 3	Case combined data average 150 days	199	n/a	<p>Timeliness is taken from IOPC published bulletins and available retrospectively.</p> <p>Quarter Case combined data average 150 days (ex subjudice) from Centurion.</p> <p>IOPC bulletin will publish breakdown by case type logged (YTD)</p>
Average time to finalise complaint cases (days) – not Schedule 3		149	n/a	
Applications for review sent to local policing body	0	0		None recorded during Q4
Applications for review sent to IOPC	0	0		None recorded during Q4

¹ All dissatisfaction data should be logged on Centurion (PSD) to reflect true public complaint data relating to Action Fraud. This is essentially a manual process from Sugar (the customer facing Action Fraud website) and inputted to Centurion. There are issues with Sugar, as the website allows complaints to be made, the identification of what might be defined as a complaint

Nature of allegations – Of the 144 allegations recorded during Q4 2024/25 the highest number was in the category of, A1 – Police action following contact (92) followed by General level of Service (23). A3 – Information (14) and A2 Decisions (9) Reasons for complaint mostly relate to customer expectation of Action Fraud, with either the lack of contact or investigation cited. This is an increase in allegations recorded against Q3 of 25 (21%).

Members of Parliament –

There have been 65 miscellaneous cases logged where MPs have contacted PSD on behalf of a constituent. This is an increase against the previous quarter. The average being logged as 56 over the last 5 quarters. Local election campaigning took place during Q4. There are relatively new M.P's in constituencies which may impact on the increased contact on behalf of constituents.

Action Fraud –

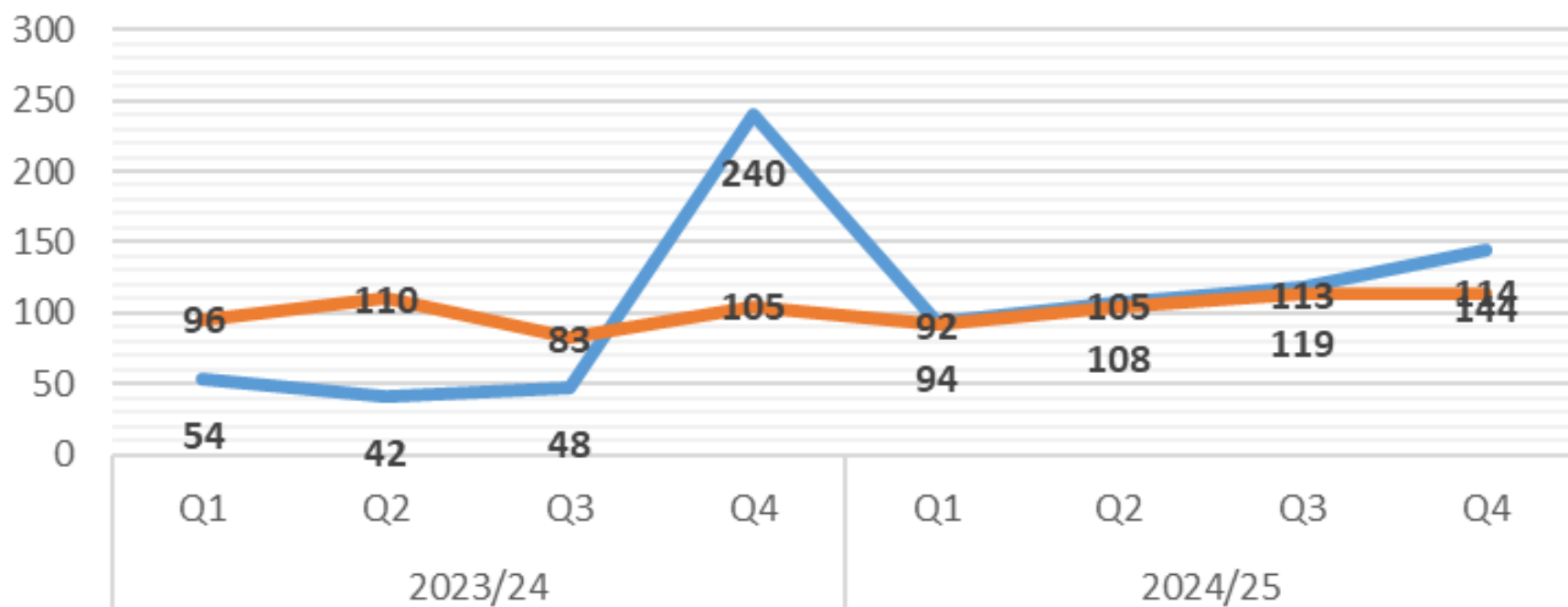
In **QTR 4** of the 2024/25 Financial Year Action Fraud recorded **141,020** reports on the National Fraud Database (**94,404** crime reports and **46,616** Information reports).

The complaint figures (total) represent 0.08% of the total number of Action Fraud reports recorded in Q4.

(as some of these are not complaints), and then referring identified complaints to PSD. In order to rectify this issue. 1. We are manually capturing and transferring AF Sugar complaints to PSD and 2. There is PSD engagement with the facilitation of the new AF/NFIB systems (however, there are no plans to automate the 'complaints' into Centurion at this time).

Action Fraud complaint data

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



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City of London Corporation Committee Report

Committee(s): Professional Standards and Integrity Committee	Dated: 03 June 2025
Subject: Stop & Search and Use of Force Data – Quarter 4 2024/25	Public report: For Information
This report: <ul style="list-style-type: none"> • 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:	Supt Jesse Wynne

Summary

1. Q4 saw several proactive operations within the City of London Police (CoLP) including proactive bag theft operations run by the Proactive and acquisitive crime team and road traffic operations run by Roads Policing unit. There has been a high number of protest both within the city and the MPS. We continue to support Operation Benbow¹ with deployments for our public order officers deploying to Palestine Solidarity Campaign / Pro Israel protests, and football matches including European matches when held in London.
2. Stop/searches have seen a further decrease of 10% since the previous quarter (Q3 2024). This is generally due to the increased scrutiny, feedback and training for our officers on stop and search, which has also seen a reduction in complaints for stop search and use of force.

¹ Op Benbow- Cross Border mutual aid Operations with MPS

3. Although there has been a decrease in stop search, along with a decrease in items found, our positive outcome rate has also dropped from 52% to 49%. This is still one of the highest outcome rates across the country. During the period of Q4 we have again seen a decrease in Black disproportionality from 2.3 to 2.26. There is no operational reason during this period. Asian disproportionality has increased from 0.9 to 1.32. (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).
4. Of the 441 stop/searches in the Q4 period, 110 were dip sampled at a rate of 24.94% experiential learning and feedback is given to officers where appropriate. This is above the targeted range of 10-15% dip sampling. There are no live ongoing formal complaints under investigation.

5. Complaints

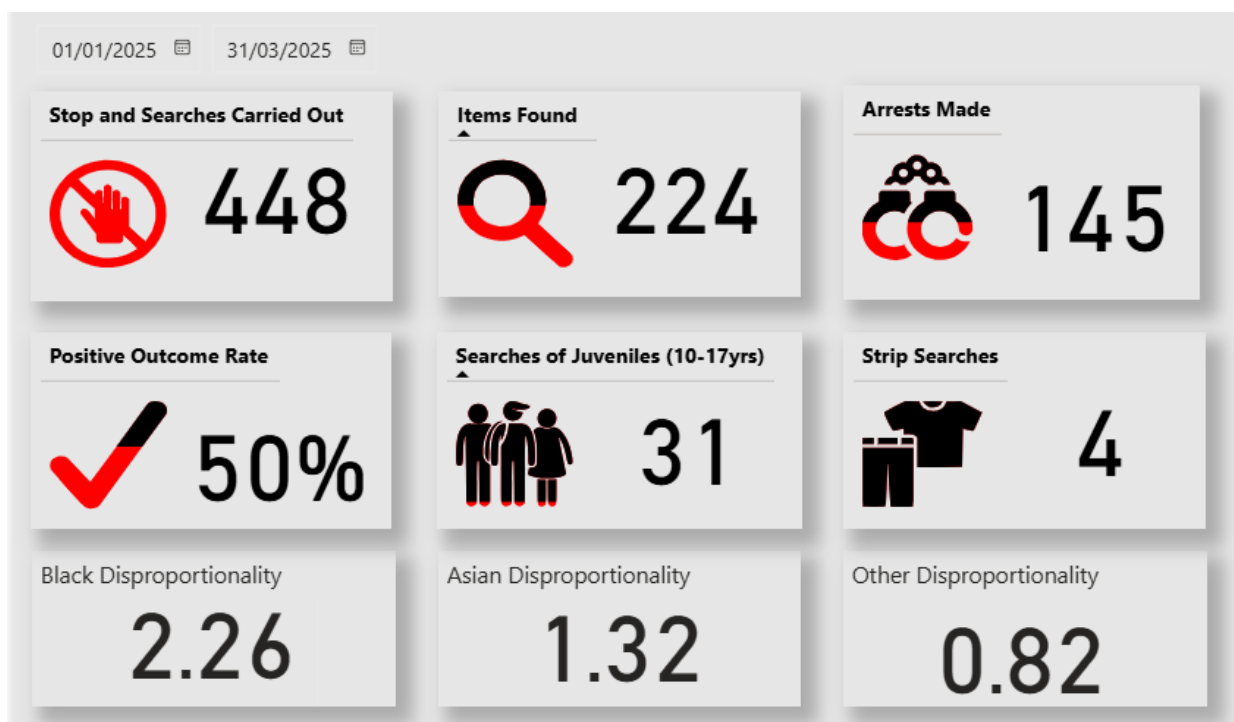
Total no Use of Force complaints - 3

Total number of Complaints Stops, and Stop and Search – 3

This is a reduction from Q3 which saw figures of:

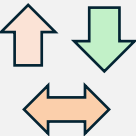




Total no Use of Force complaints - 9

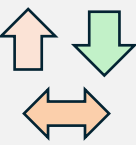






Total number of Complaints Stops, and Stop and Search – 7



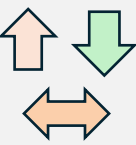







Stop and Search and Use of Force Data

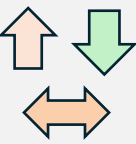


- **Key changes** – see comments below
- **Disproportionality** – see comments below
- **Outcomes** – See below

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend 	Comment (if appropriate)
Stop search	441	- 49 10%		Decrease in stop/search due to amount of operations and events in this period.
Arrest from stop search	145	- 28 16.18%		Decrease in arrests from stop search due to decrease in searches.
Searches under s.60	0	0		
Juveniles searched	31	- 10 24.39%		Decrease in youth search.

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend 	Comment (if appropriate)
Black disproportionality	2.26	-0.04 1.73%		Decrease in Black disproportionality.
Asian disproportionality	1.32	+0.42 46.6%		Increase in Asian disproportionality.
Total items found	220	- 33 13.04%		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.
Strip searches ² total	4	-9 69.23%		Decrease in strip searches.
Strip search-More thorough	0	0		
Juvenile strip searches total	0	0		N/A

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 search-More thorough	0	0		None – see above
Juvenile Strip Search -Intimate parts exposed	0	0		None – See above
Use of force	840	-59 6.56%		Increase in UOF. This may be due to increased scrutiny around completion of UOF forms
Juvenile use of force	23	-40 63.49%		Increase in juvenile UOF. This may be due to increased scrutiny around completion of UOF forms
Uses of force arrests	555	-53 8.71%		Decrease in force used during arrests. This may be due to increased scrutiny around completion of UOF forms
Uses of taser	18	+1 5.88%		Increase in Taser use (Drawn or Red dot challenge)
Taser discharges	1	+1 100%		Increase in Taser discharge.

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend 	Comment (if appropriate)
Live complaints relating to stop/ search	3	-4		
Live complaints relating to use of force	3	-6		

Key wider issues, risks, and mitigations

6. As a force we wait for the results of the HMICFRS Inspection that took place during this reporting period.
7. 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.

Recommendations

Members are asked to:

- Note the report.

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Appendix A - types of strip search

Level	Extent of search	Who can search?	Where can you search?
1	Standard: Up to Jacket, Outer coat & Gloves removed	Any Officer	Public Place
2	More Thorough: Headgear & footwear removed	Any Officer	Out of public view
3	More Thorough: Religious headgear only removed	Same sex where practicable	Out of public view
4	More Thorough: Upper and lower clothing removed	Same sex	Out of public view
5	More Through Intimate Parts exposed	Same sex	Out of public view (not in police vehicle)

City of London Corporation Committee Report

Committee(s): Professional Standards and Integrity Committee	Dated: 03 June 2025
Subject: Stop & Search and Use of Force Data – April 2024-March 2025	Public report: For Information
This report: <ul style="list-style-type: none"> • 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:	Supt Jesse Wynne

Summary

1. This financial year has seen a high number of protest both within the city and the MPS. We continue to support Operation Benbow¹ with deployments for our public order officers deploying to Palestine Solidarity Campaign / Pro Israel protests, and football matches including European matches when held in London.
2. Of the 2286 stop/searches in the 24/25 period, 308 were dip sampled at a rate of 13.47% experiential learning and feedback is given to officers where appropriate. This is within the targeted range of 10-15% dip sampling. There are no live ongoing formal complaints under investigation.
3. Although there has been a decrease in stop search, there has been a increase in items found which is showing that officers are considering their grounds for search more thoroughly. Our outcome rate for the year is 48%. This is the highest outcome

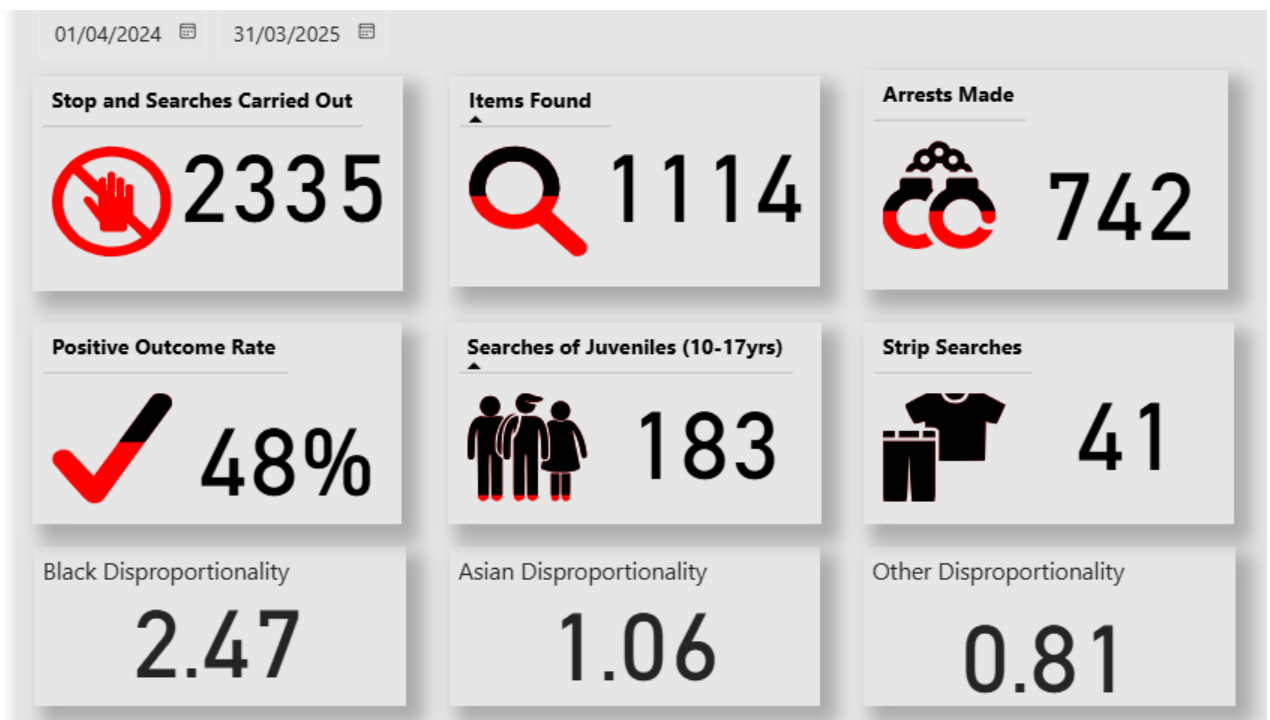
¹ Op Benbow- Cross Border mutual aid Operations with MPS

rate across the country. During the year we have seen a small increase in Black disproportionality from 2.21 to 2.47. Asian disproportionality has increased from 0.98 to 1.06. (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).

4. Complaints

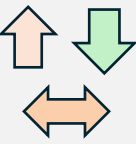





Total no Use of Force complaints – 11

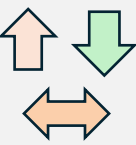






Total number of Complaints Stops, and Stop and Search – 9



Stop and Search and Use of Force Data













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

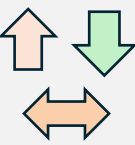

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend 	Comment (if appropriate)
Stop search	2286	- 234 9.28%		
Arrest from stop search	742	+41 +5.84%		
Searches under s.60	0	0		
Juveniles searched	183	- 47 17.19%		
Black disproportionality	2.47	+0.26		

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend 	Comment (if appropriate)
		+11.76%		
Asian disproportionality	1.06	+0.08 +8.16%		
Total items found	1090	+156 +16.17%		
Strip searches ² total	41	-3 -6.81%		
Strip search - More thorough	0	0		
Juvenile strip searches total	0	0		
Juvenile 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 Search -Intimate parts exposed	0	0		
Use of force	3829	-332 -7.97%		
Juvenile use of force	181	-31 -14.62%		
Uses of force arrests	2475	-95 -3.69%		
Uses of taser	105	-8 -7.07%	 	
Taser discharges	6	+3 100%	 	
Live complaints relating to stop/ search	9	+2 +28.57%		

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend 	Comment (if appropriate)
Live complaints relating to use of force	11	-6 -35.29%		

Key wider issues, risks, and mitigations

5. As a force we wait for the results of the HMICFRS Inspection that took place during this reporting period.
6. We will follow the HMICFRS and integrate these within our systems to ensure we continue to have effective scrutiny and correct governance.

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Appendix A - types of strip search

Level	Extent of search	Who can search?	Where can you search?
1	Standard: Up to Jacket, Outer coat & Gloves removed	Any Officer	Public Place
2	More Thorough: Headgear & footwear removed	Any Officer	Out of public view
3	More Thorough: Religious headgear only removed	Same sex where practicable	Out of public view
4	More Thorough: Upper and lower clothing removed	Same sex	Out of public view
5	More Thorough Intimate Parts exposed	Same sex	Out of public view (not in police vehicle)

Committee(s): Professional Standards and Integrity Committee Police Authority Board	Dated: 03 June 2025 23 July 2025
Subject: Annual Review of Police Complaints Activity – 2023/24	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Diverse engaged communities; dynamic economic growth, vibrant thriving destination
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Town Clerk	For information
Report author: Rachael Waldron, Police Authority Compliance Lead, Town Clerks in consultation with Detective Supt Carly Humphreys / PC Ann Roberts, Professional Standards Directorate	

Summary

This report presents a summary of the complaints and allegations concerning the City of London Police and the Action Fraud reporting service for the year 2023/24. Local Policing bodies have a statutory obligation to publish quarterly data on complaints as reported by the Independent Office for Police Conduct (IOPC), with the most recent annual statistics available for 2023/24. Additionally, these bodies are required to provide a narrative detailing how they hold the relevant chief officer accountable along with an evaluation of their performance in managing complaints. This information must be prominently displayed on their websites. The attached report has been prepared in accordance with these requirements.

Recommendations

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

Main Report

Background

1. The Policing and Crime Act 2017, along with its supporting regulations, introduced significant reforms to the police complaints and disciplinary systems. These reforms were aimed at creating a more straightforward, proportionate and customer centric complaints process that emphasises learning and improvement. The implementation date for these changes was February 1, 2020.
2. Reports of dissatisfaction regarding the City of London Police are recorded and assessed in accordance with Schedule 3 of the Police Reform Act 2002 and the Independent Office for Police Conduct (IOPC) Statutory Guidance 2020. The City of London Police and the Police Authority (as the Local Policing Body for the City of London Police) are primarily responsible for managing most of the complaints.
3. The City of London Police is responsible for the initial assessment and handling of complaints, which can lead to several possible outcomes:
4. **Non-Schedule 3 or Early Service Recovery:** The Professional Standards Directorate (PSD) of the City of London Police will contact the complainant early on to understand their concerns and dissatisfaction, and where the nature of their dissatisfaction allows, will attempt to resolve the issue promptly. This approach helps avoid a lengthy investigative process and can provide the complainant with a quick resolution, explanation or satisfactory outcome. If the matter cannot be resolved at this stage it may be escalated as a formal complaint under Schedule 3.
5. **Schedule 3 Recorded Complaints:** The IOPC Statutory Guidance outlines which complaints must be recorded and which require investigation, particularly those involving more serious allegations. Complaints that do not necessitate an investigation will be managed reasonably and proportionately to seek an early resolution to the complaint's satisfaction, while others will undergo formal investigation. If the complainant remains dissatisfied with the outcome, they are entitled to a review by either the Local Policing Body or the IOPC, depending on the severity of the allegation.
6. **Referral to the Independent Office for Police Conduct:** Certain complaints may be referred to the IOPC, which may decide to conduct an independent investigation. The IOPC also monitors the complaints system, and their data reflects these outcomes.

Report for 2023/24

7. This report details the complaints data for 2023/24, which is publicly accessible on the IOPC website. It outlines how the City of London Police Commissioner is held accountable concerning complaints and reviews, and an account of the

Police Authority's own performance in terms of undertaking complaint reviews. Additionally, it explains how lessons learned from the complaints process are being integrated into the City of London Police.

8. For the City of London Police, the IOPC data includes complaints regarding the national Action Fraud Reporting service. In 2023/24 the City of London Police received a total of 541 complaints, of which 161 pertained to the local force and 380 related to the Action Fraud Service. This figure is comparable to the 2022/23, which recorded 594 complaints (167 about the local force) and 427 related to the Action Fraud Service. The total number of allegations in 2022/23 was 666, reflecting a 2% decrease from the previous year. In 2021/22 there were 588 complaints (137 about the local force) and 451 about Action Fraud.

Data Capture and Complaint Reviews

9. It is important to note that a single complaint may encompass multiple allegations, each potentially involving the City of London Police as an organisation or specific individuals. These allegations can be updated during the complaint handling process as new information arises.
10. In terms of complaint reviews, panels established under the Professional Standards and Integrity Committee convened four times during 2023/24, addressing 4 cases. The average duration for these determinations was 194 days, slightly down from 200 in 2022/23.

Common Complaints and Improvements

11. The most frequent complaints, comprising 447 allegations (69%) of all cases, were related to the delivery of duty and service, primarily focusing on dissatisfaction, with communication delays of updates, rather than allegations of police misconduct. In response, the Professional Standards Directorate has implemented various measures to enhance the efficiency, timeliness and quality of complaint outcomes.

Improvements Include:

12. **Early Service Recovery:** The Professional Standards Office Manager and the Complaints Team now engage directly with complainants, assigning complaints to accountable inspectors and Sergeants to provide timely resolutions with appropriate explanations and apologies.
13. **Template Letters Development:** The use of template letters for complaints has been refined to ensure clarity regarding decision making processes, outcomes and referrals to external agencies (e.g. Citizens Advice, Ombudsman).
14. **Increased Scrutiny by the Police Authority:** The Police Authority's Policy Officer has enhanced scrutiny functions related to complaints through the Professional Standards and Integrity Committee.

15. **Monthly Review Panels:** To provide a more prompt response to review requests, the Police Authority's Compliance Lead has established monthly Review Panel meetings to consider cases.

16. **Upskilling of the Compliance Lead Role:** The Police Authority continues to develop the Compliance Lead's skills thoroughly professional development training, including statutory workshops by the IOPC, leading to higher quality review outcomes for complex cases.

17. It is anticipated that the ongoing enhancements to the complaints handling process will facilitate timely progression of complaints.

Appendices

- Appendix 1 – Glossary of Terms
- Appendix 2 – City of London Police Complaints data 2023/24

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City of London Police – Complaints 2023/24

Introduction

This annual report presents an analysis of complaints and allegations made against the City of London Police and its national Action Fraud reporting service for the year 2023/24. It is mandated that local policing bodies publish the most recent quarterly complaint data from the Independent Office for Police Conduct (IOPC) for the force, accompanied by a statistical report. This report also includes a narrative outlining how accountability is maintained for the chief officer, alongside an assessment of its own performance in carrying out its complaints handling functions.

Definitions of terms related to police complaints can be found in Annex A of this report.

2023/24 complaints data – At a glance

The City of London Police received **541 complaints** in 2023/24, of which **161** were about the local force and **380** were about the Action Fraud Service* These complaints contained a total of **651** allegations.

The average time to log a complaint was **6 days** and the average time taken to contact a complainant was **28 days**. On average it took **97** days to finalise cases falling outside of Schedule 3*** and **199** days to finalise Schedule 3 cases (ex-suspension).

The commonest complaint allegation types – accounting for 447 (69%) were about deliveries of duties and service. The majority of which relate to Action Fraud.

Of the 4 cases reviewed by the local policing body 2 were upheld (meaning that the policing body concluded the complaint had not been handled appropriately) and recommended that additional measures were taken to remedy the dissatisfaction expressed by complainants.

**The City of London Police operates the national Action Fraud reporting service*

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

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

What complaints were about

A complaint may consist of one or more allegations, with each allegation categorised into one of 11 distinct categories, and assigned a subcategory where applicable. The primary objective of these categories is to identify and capture the underlying cause of the dissatisfaction expressed.

Chart 1 illustrates the total volume of complaints, allegations and the number of complainants for 2023/24, highlighting the split between the local City of London Police services and the national Action Fraud reporting service.

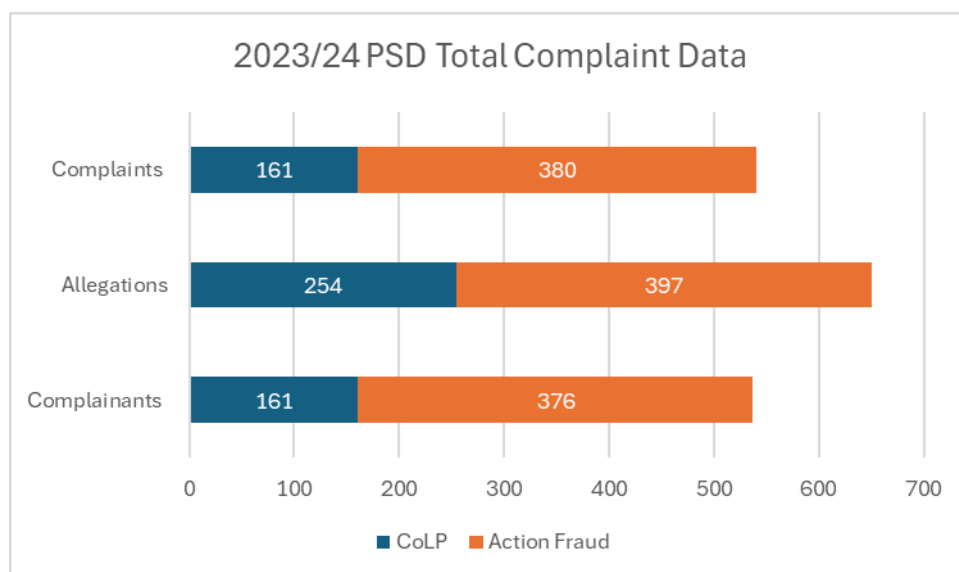


Chart 2 – Breakdown of Schedule 3 and non-Schedule 2 complaints (exc. Action Fraud)

Presents the number of complaints logged against the local City of London Police service that were categorised under ‘Schedule 3’ for each quarter of 2023/24. Schedule 3 related to complaints that are recorded and investigated in accordance with the statutory guidance set by the Independent Office for Police Conduct (IOPC). It is important to note that some complaints may not warrant a comprehensive Schedule 3 enquiry; for instance, if an individual seeks clarification on an issue or wished to raise a concern. In such cases, these complaints are categorised as outside the scope of Schedule 3.

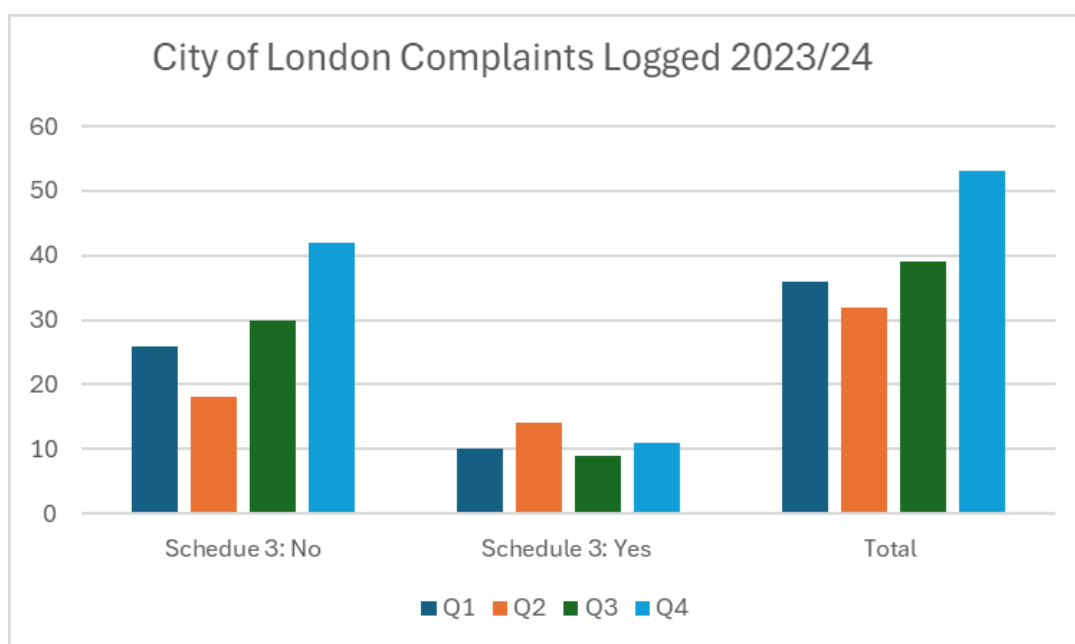


Chart 3 – Reasons for recording complaints under Schedule 3 (inc. Action Fraud)

This presents a year on year comparison of the different reasons complaints were formally recorded under Schedule 3, including decisions made by the handling body.

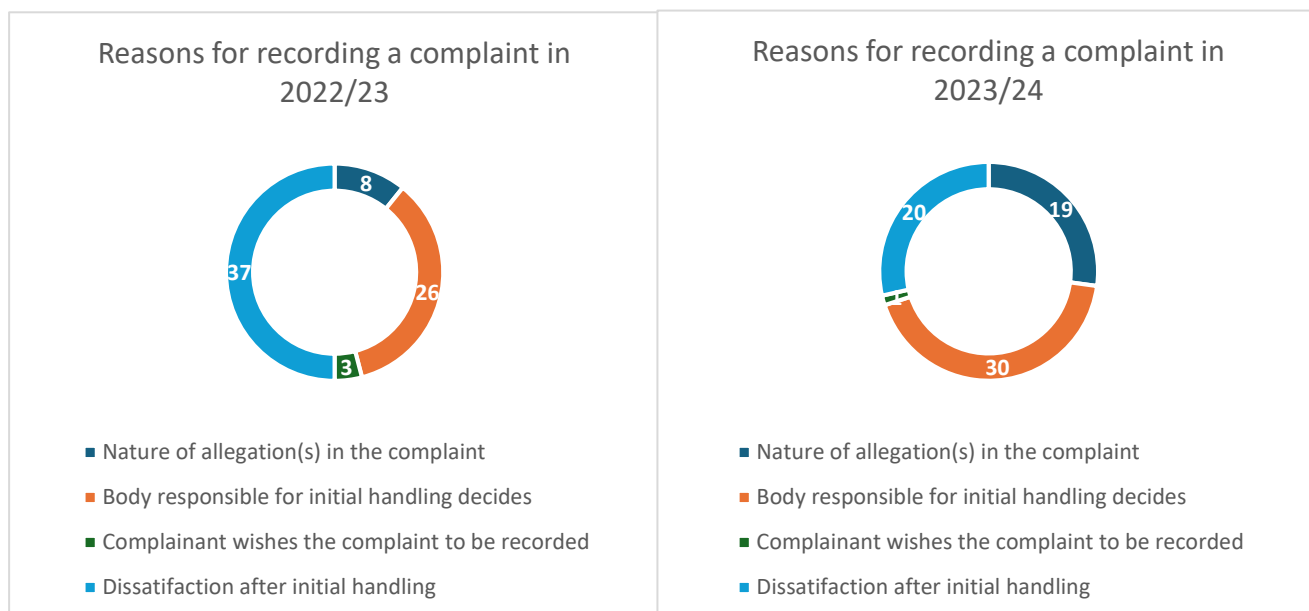
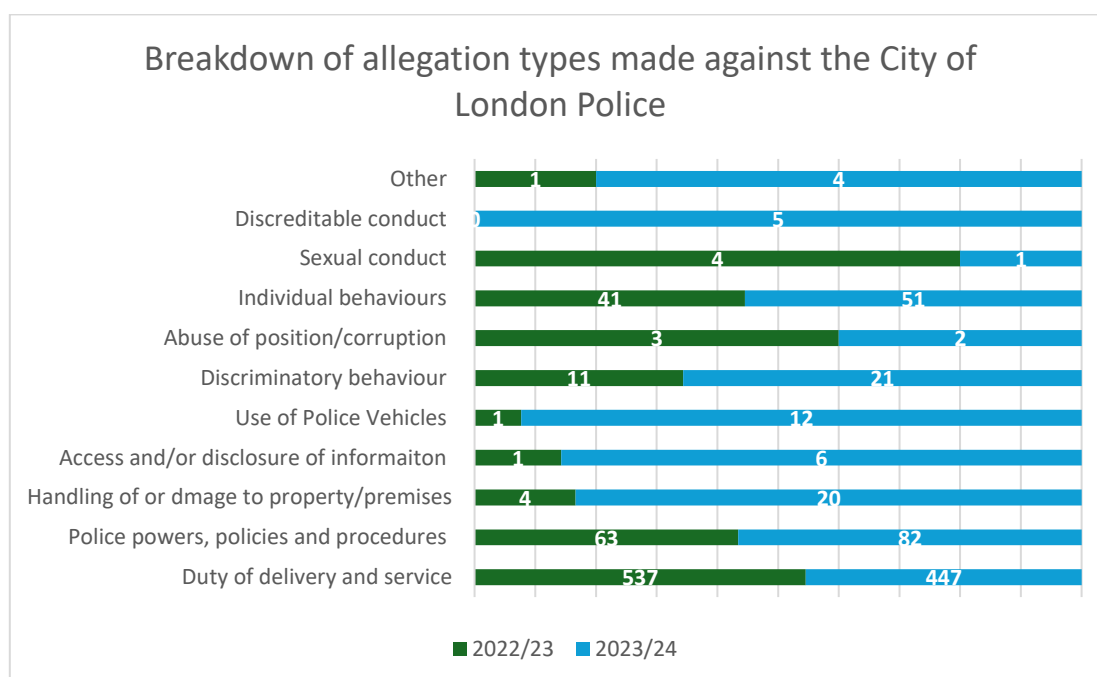


Chart 4 – A comparison of the breakdown of allegation types reported against the City of London Police (including Action Fraud) for the years 2022/23 and 2023/24.



A comparison of police complaints data from 2022/23 and 2023/24 reveals a slight overall reduction in the number of allegations recorded from 666 to 651. While complaints related to service delivery remain the most common, they decreased notably from 537 to 447. In contrast, complaints concerning police discriminatory behaviour and individuals conduct all increased suggesting a shift in concerns.

The number of complaints recorded under Schedule 3 due to the nature of allegations or dissatisfied initial handling also rose, indicating a growing need for formal resolution pathways. Additionally, Action Fraud continued to account for a significant proportion of complaints, with a marked spike in Q4, highlighting potential issues in service delivery or public engagement during across the period.

Overall, the data suggests that while the volume of complaints has stabilised, the complexity and seriousness of issues raised are increasing.

Sub section on Action Fraud Complaints

Chart 5 – Quarterly breakdown of complaints logged, and allegations recorded

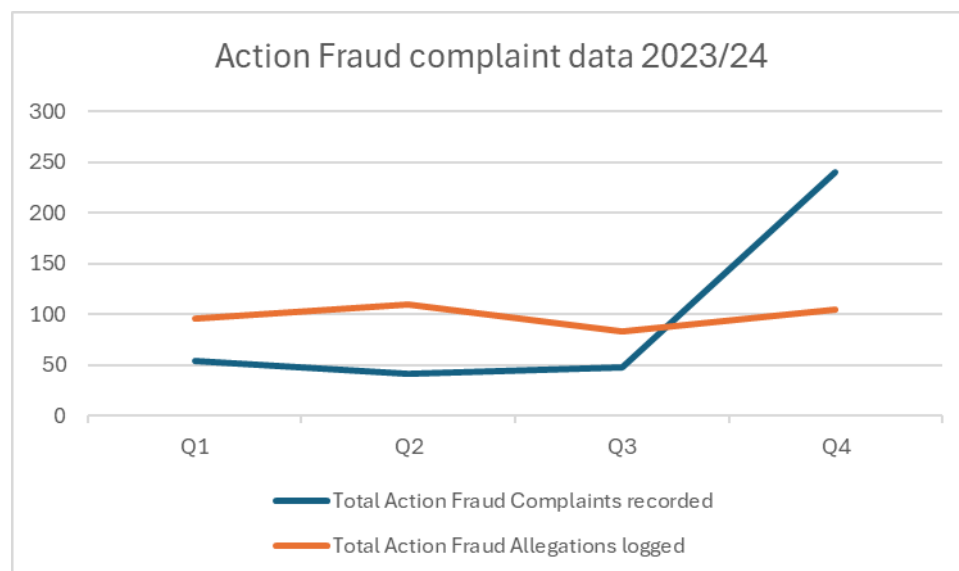
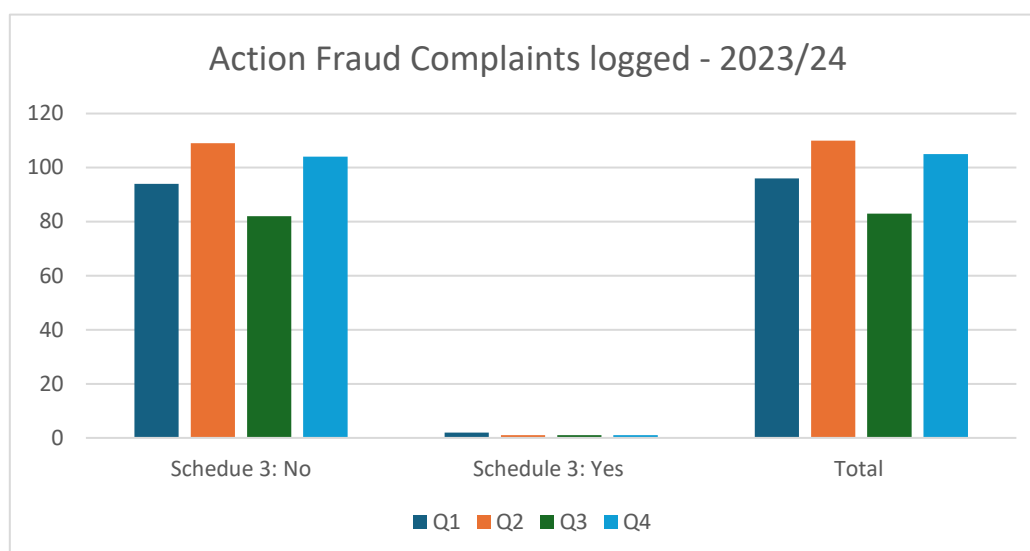


Chart 6 – Presents the breakdown of Schedule 3 and Non-Schedule 3 complaints related to Action Fraud. Schedule 3 related to complaints that are recorded and investigated in accordance with the statutory guidance provided by the Independent Office for Police Conduct. Certain complaints may not undergo a detailed Schedule 3 enquiry, such as when an individual seeks clarification on an issue or wishes to express a concern. In these instances, the complaint is classified as 'Outside Schedule 3'.

Chart 6 – Breakdown of Schedule 3 and non-Schedule 3 complaints – Action Fraud (2023/24)

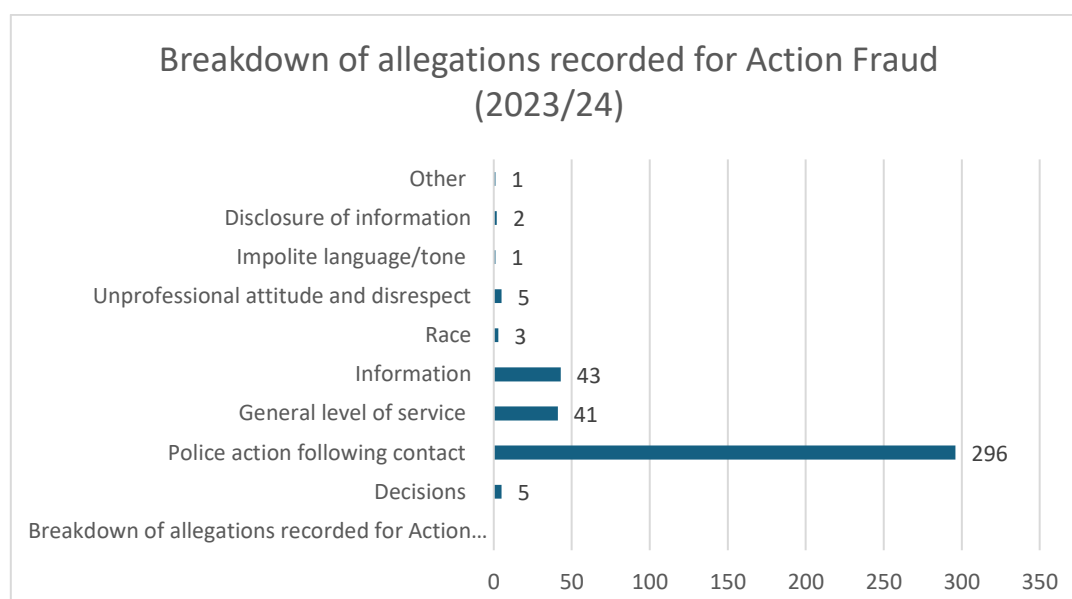


This chart highlights that the majority of Action Fraud complaints are recorded outside Schedule 3.

It is important to note that although most allegations pertain to a perceived level of failure to investigate cases submitted to Action Fraud (as indicated in the 'decisions' category below), Action Fraud operates solely as a reporting service and does not bear investigative responsibilities. Cases submitted to Action Fraud are initially assessed by the National Fraud Intelligence Bureau, and when deemed appropriate, are forwarded to local police forces for potential investigation.

The City of London Police now routinely provided complainants with information about relevant patterns and stakeholders who may be better equipped to address their concerns and assist in the recovery of lost funds.

Chart 7 – Breakdown of allegations recorded for Action Fraud (2023/24)



The City of London Police is the National Lead Force for Fraud. Since April 2013, it has been responsible for receiving all fraud reports across England and Wales through the 'Action Fraud' reporting process. Reports submitted to Action Fraud are forwarded to the National Fraud Intelligence Bureau (NFIB) for assessment and potential dissemination to local law enforcement agencies for investigation consideration.

Since September 2020, the Professional Standards and Integrity Committee of the City of London Police Authority has received separate reports on Action Fraud and City Police complaints data, enabling a more focused approach to scrutinising these separate areas of complaints.

The majority of complaints related to Action Fraud pertain to a perceived lack of investigation into reported incidents. However, it is important to clarify that Action Fraud does not hold investigative responsibilities and consequently, such complaints fall outside the remit of the police complaints system.

While the police complaints system does not permit complainants to challenge or overturn previous decisions regarding the investigation of reported fraud, the Professional Standards Directorate has continued to provide detailed and tailored prevention advice to individuals raising such concerns, which ensures that individuals receive information about the most appropriate partner agencies, which are better positioned to address their concerns and support the recovery of lost funds. This has proven effective in aligning complainant's expectations with the scope of services provided by Action Fraud.

It is expected that the forthcoming implementation of the New Action Fraud Replacement Service will assist with the generation of greater insights into fraudulent activity, which will enable rapid dissemination of information, thereby mitigating the impact of fraud on victims at scale.

How is the City of London Police Commissioner held to account?

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

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

The outcomes of the Professional Standards and Integrity Committee's quarterly meetings are reported to the City of London Police Authority Board, which holds overarching responsibility for holding the Commissioner of the City of London Police to account and ensuring the delivery of an effective and efficient police service.

During the 2023/24 reporting period, the Professional Standards Committee received regular statistical updates on complaint cases, including trends in the nature of allegations and the methods by which these were resolved. The Committee continued to undertake detailed scrutiny of complaint casework logged by the City Police.

In collaboration with the Director of the Professional Standards Directorate (PSD), the PSI Committee has worked to ensure that the papers reviewed by Committee included sufficient detail to assess the appropriateness of outcomes, while safeguarding personal information and avoiding unnecessary administrative burden. In 2023/24, the Committee also maintained oversight of conduct matters, receiving updates on all misconduct meetings and hearings conducted by the City Police.

The PSI Committee continued to support the City Police in identifying and embedding organisational learning from complaints and conduct cases.

Learning remains central to the work of PSD. Complainants frequently seek recognition of shortcoming in the handling of their cases and often express a desire for the officer or organisation to acknowledge these failings and demonstrate how similar issues will be prevented in the future. Reflective Practice has been embedded as a key component of the organisational learning culture, in alignment with the principles encouraged by the Police Regulations.

The Organisational Learning Forum (OLF) continues to play a vital role in embedding learning across the City of London Police. It is supported by several tactical working groups focused on key operational areas, including custody, public order, stop and search and professional standards, and promotes application of learning at a local level.

The Professional Standards Directorate Working Group (PSDWG) is attended by a compliance officer from the City of London Corporation's Police Authority Team, representing the PSI Committee. In 2023/24 this representative participated in PSDWG meetings, attended refresher workshops facilitated by the Independent Office for Police Conduct (IOPC), as well as by legal professionals specialising in police complaints and misconduct.

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

Since February 2020, local policing bodies have held responsibility for determining reviews of police complaints where a complainant believes their case was not handled reasonably or proportionately.

In the City of London, this responsibility is delegated to the Professional Standards and Integrity Committee of the Police Authority Board.

Review panels, comprising three members of the Committee, are convened in accordance with the established governance within the Corporation's governance framework. These panels operate independently to assess whether complaints were

managed appropriately and to identify any emerging themes of organisational learning.

The review process is supported by the Compliance Lead within the Police Authority Team, who oversees the end-to-end administration of each case. This includes acknowledging and assessing review requests, managing documentation and preparing recommendations reports for the panel's consideration.

All review applications are assessed against the criteria set out in the Independent Office for Police Conduct (IOPC) statutory guidance.

Reviews considered in 2023/24

During 2023/24, the complaints review panel convened on four occasions to consider four individual cases. The breakdown of these cases is as follows:

Outcomes of review by the Local Policing Body:	Upheld	Not Upheld
Reviews completed	2	2
Subject matter of cases		
Police Powers, policies and procedures		

In accordance with IOPC statutory guidance, there is no mandated timescales for completing complaint reviews. However, the City of London Police Authority remains committed to progressing reviews as efficiently as possible. Delays may occur due to case complexity or the need for further enquiries with the force, the IOPC or the complainant – such as reviewing police statements or Body Worn Video footage.

In 2023/24, review requests were acknowledged within 30 days of receipt. The average duration for these determinations was 194 days, slightly down from 200 in 2022/23.

Three recurring themes emerged from the reviews considered funding the year:

i) Perceived Inadequacy in Service Delivery

Complainants expressed dissatisfaction with the initial handling of their complaints, delays and insufficient assessment of the facts. These concerns suggest a need for improved early engagement and more thorough scoping of dissatisfaction at the outset.

ii) Impact of Police Actions on Complainants

Reviews highlighted the emotional and financial toll of complaints involving police powers, such as stop and search or arrest. Complainants often described the process as resource-intensive and lacking in empathy.

iii) Desire for Organisational Learning and Acknowledgement

Complainants sought reassurance that their experiences would lead to meaningful learning. A common concern was the perceived lack of acknowledgement from the force regarding the circumstances arising from dissatisfaction expressed and how similar issues would be prevented in future.

These themes have been shared with the Professional Standards Directorate and Working Group. In response, efforts have been made to embed learning through reflective practice and continuous professional development, enabling officers and supervisors to better understand and address complainant concerns.

The Police Authority has also continued to clarify its role in the complaints system, focussed on assessing whether complaints were handled reasonable and proportionately. Where appropriate, complainants have been signposted to external agencies such as the Citizens Advice Bureau or the Financial Conduct Authority for further support. No judicial review applications were submitted in 2023/24.

Conclusion

The 2023/24 police complaints data for the City of London Police, including Action fraud highlights both progress and opportunities for improvement in the year ahead.

While improvements have been made in areas such as the timeliness of complaint logging, reducing from 21 days in 2022/23 to 6 days in 2023/24, the data also highlights ongoing concerns around service delivery, responsiveness and consistency of complaints handling.

Action Fraud continues to account for a disproportionately high volume of complaints and allegations, reflecting ongoing public dissatisfaction with its service delivery, which presents opportunities for targeted improvement in communication, particularly in clarifying the scope and limitation of the police complaints system.

The consistent number of complaints recorded under Schedule 3 suggests that a significant proportion of cases meet the threshold for formal handling, often due to the dissatisfaction with initial responses or the nature of the allegations. This reinforces the importance of robust early resolution mechanisms and transparent triage processes.

The data shows that the most frequently cited issues related to service delivery, police powers and individual conduct. These patterns suggest that public concerns are not limited to outcomes but also encompass the quality of interactions and procedural fairness, which are issues that align with broader national concerns about trust in policing.

More broadly, comparative data shows mixed performance against national averages. While CoLP has improved the average time taken to log complaints (from 21 days in 2022/23 to 6 days in 2023/24), it continues to sit slightly behind national

benchmarks in areas such as contacting complainants and finalising complaints outside schedule 3.

These findings collectively highlight the need for continued investment in complaint handling processes, with a sustained focus on learning and accountability. Insights on complaints should be systematically translated into training, policy development and frontline practice to prevent recurrence and support cultural change.

Based on the findings, key focus areas for the year ahead should include reducing the time taken to contact complaints and finalising cases for the force, particularly those handled outside of Schedule 3, to ensure that informal resolutions are fair and consistent, and strengthening internal oversight through improved guidance and quality assurance. This should occur alongside reviews conducted by the Police Authority, so they align more closely with national benchmarks. Addressing these priorities will be essential to enhancing public confidence and ensuring that both the City of London Police and the Police Authority delivery a fair, transparent and responsive complaints system.

Appendices

- Appendix 1 – City of London Police Complaints data 2023/24
- Appendix 2 – Glossary of Terms

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Annex A: glossary of terms

Allegation: An allegation may concern the conduct of a person or persons serving with the police or the direction and control of a Police force. It is made by someone defined as a complainant under the Police Reform Act 2002 (see 'complainant' below). An allegation may be made by one or more complainants.

A complaint case may contain one or many allegations. For example, a person may allege that they were pushed by an officer and that the officer was rude to them. This would be recorded as two separate allegations forming one complaint case. An allegation is recorded against an allegation category.

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

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

- a member of the public was adversely affected by the matter complained about, or is acting on behalf of someone who was adversely affected by the matter complained about
- a member of the public who claims to be the person in relation to whom the conduct took place
- claims to have been adversely affected by the conduct
- claims to have witnessed the conduct, or
- is acting on behalf of someone

who satisfies one of the above three criteria

- a member of the public can be said to be a witness to the conduct if, and only if: they have acquired their knowledge of the conduct in a manner which would make them a competent witness capable of giving admissible evidence of that conduct in criminal proceedings, or
- they possess or have in their control anything that could be used as admissible evidence in such proceedings
- a person acting on behalf of someone who falls within any of the three categories above. This person would be classed as an 'agent' or 'representative' and must have the written permission of the complainant to act on their behalf.

A person is 'adversely affected' if they suffer distress or inconvenience, loss or damage, or are put in danger or at risk by the conduct complained of. This might apply, for example, to other people present at the incident, or to the parent of a child or young person, or a friend of the person directly affected. It does not include someone distressed by watching an incident on television.

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

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

- Police officers of any rank
- Police staff, including community support

officers and traffic wardens

- Special Constables

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

Complaint recording

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

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

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

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

Schedule 3 Recorded – IOPC Statutory Guidance stipulates where

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

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

Investigations:

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

Investigation outcomes:

Where a complaint has been investigated but the investigation has not been subject to special

procedures, or a complaint has been handled otherwise than by investigation, the outcome of the complaint should include a determination of whether:

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

Reflective Practice Review Process:

Practice Requiring Improvement (PRI) is an appropriate outcome within Police Regulations for low level matters of complaint or conduct following a PSD investigation. The Reflective Practice Review Process (RPRP) is the process undertaken by officers to reflect upon their involvement and review the practice that requires improvement. Where a matter is raised or identified internally and does not reach the threshold for PSD investigation or disciplinary action, it should be handled locally by line managers and supervisors under RPRP. The process should be a clear focus on reflection, learning from mistakes and focusing on actions / development to improve and, where necessary, put the issue right and prevent it from happening again. RPRP should be used for low-level intervention and performance issues that do not warrant a written warning or above or Unsatisfactory Performance Procedures (UPP).

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

Misconduct: A breach of the Standards of Professional Behaviour

Misconduct Hearing: A type of formal misconduct proceeding for

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

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

Sub judice: After recording a complaint, the investigation or other procedure for dealing with the complaint may be suspended because the matter is considered to be sub judice. This is when continuing the investigation / other procedure would prejudice a criminal investigation or criminal Proceedings.

There are a number of factors Police forces should consider when deciding whether a suspension is appropriate. The complainant must be notified in writing when the investigation / other procedure into their complaint is suspended and provided with an explanation for the decision. A complainant has the right to ask the IOPC to review that decision.

Withdrawn: A complainant may decide to withdraw one or more allegations in their complaint or that they wish no further action to be taken in relation to their allegation/complaint. In this case, no further action may be taken with regard to the allegation/complaint.

Police Terminology

AA: Appropriate Authority

ANPR: Automatic Number Plate Recognition

ATOC: (Association of Train Operating Companies) agreements.

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

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

BWV : Body Worn Video

CAD: Computer Aided Dispatch

CCJ: County Court Judgement

DPS: Directorate Professional Standards (Metropolitan Police Service)

DSI: Death or Serious Injury

ECD: Economic Crime Directorate

FI: Financial Investigator

HCP: Health Care Professionals

IOPC: Independent Office of Police Conduct

LP: Local Policing

MIT: Major Investigation Team

MPS: Metropolitan Police Service

NFA: No Further Action

NLF: National Lead Force

NUT: National Union of Teachers

PCO: Public Carriage Office

PHV: Private Hire Vehicle

PMS: Property Management System

PNC: Police National Computer

POCA: Proceeds of Crime Act

PRI: Practice Requiring Improvement

P&T: Professionalism and Trust

SAR: Subject Access Request

SAR: Suspicious Activity Report

SIO: Senior Investigating Officer

SOP: Standard Operating Procedure

SO: Specialist Operations

STOT: Safer Transport Operations Team

TFG: Tactical Firearms Group

TfL: Transport for London

TPH: Taxi and Private Hire

Table 1 provides an overview of the IOPC data regarding complaints and allegations against the city of Londo Police for the year 2023/24. The data is presented in conjunction with national averages. However, it is important to note that the City of London IOPC data includes complaints and allegations related to the Action Fraud reporting service. As a result, the volumes and response times may not be directly comparable. For additional details, please refer to the Section on Action Fraud complaints below.

Table 1 – City of London Complaints data 2023/24		
Metric	CoLP Data*	National Average
Number of complaints logged (including Action Fraud)	541	85,458
Number of complaints logged per 1,000 employees	348	338
Number of allegations logged (including Action Fraud)	651	
Number of allegations logged per 1,000 employees	419	599
Average time taken to log complaint	6 days	5 days
Average time taken to contact complainant	28 days	6 days
Number of allegations finalised – outside Schedule 3	355	60,166
Number of allegations finalised – inside schedule 3	62	18,860
Average time taken to finalise complaint outside Schedule 3	97	20
Average time taken to finalise complaint – inside Schedule 3 (not inc suspension	199	133
Applications for review received by the IOPC – investigated	3	890
Applications for review received by IOPC – not investigated	2	1,246
Number of allegations finalised by investigation under Schedule 3 – investigated (not subject to special procedures)	53	16,901
Number of allegations finalised by investigation under Section 3 – investigated (subject to special procedures)	9	1,959
Average time taken to finalise allegations – outside Schedule 3	87	18
Average time taken to finalise allegations – not investigated under Schedule 3	158	106
Average time taken to finalise allegations – by local investigation under Schedule 3	175	191
<i>*Note that figures for the City of London include complaints and allegations about Action Fraud. This means they are not directly comparable to other forces data.</i>		

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