

# **Professionalism and Trust Committee (Police)**

Date: **TUESDAY, 14 OCTOBER 2025** 

Time: 11.00 am

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

Members: Michael Mitchell (Chair) Alderman Professor Emma Edhem

> Deborah Oliver (Deputy Chair) Jason Groves David Sales Joanna Tufuo Abeyie

Tijs Broeke Naresh Hari Sonpar Melissa Collett

Jacqui Webster

**Enquiries: Ben Dunleavy** 

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

## **AGENDA**

#### 1. APOLOGIES

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

## 3. MINUTES

To agree the public minutes and non-public summary of the meeting held on 3 June 2025.

For Decision (Pages 5 - 10)

#### 4. **REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information (Pages 11 - 12)

## 5. **EQUITY, DIVERSITY, INCLUSIVITY UPDATE**

Report of the Commissioner of Police.

For Information (Pages 13 - 50)

## 6. PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q1

Report of the Commissioner.

For Information (Pages 51 - 84)

## 7. STOP & SEARCH AND USE OF FORCE QUARTER 1 UPDATE

Report of the Commissioner.

For Information (Pages 85 - 92)

## 8. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

## 9. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT

## 10. 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

#### 11. NON-PUBLIC MINUTES

To approve the non-public minutes of the meeting held on 3 June 2025.

For Decision (Pages 93 - 94)

#### 12. POLICE CONDUCT REVIEWS - RANDOM SAMPLE

Report of the Commissioner.

For Information (Pages 95 - 104)

# 13. NON-PUBLIC APPENDIX TO PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q1

Report of the Commissioner.

For Information (Pages 105 - 114)

# 14. NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

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



# PROFESSIONAL STANDARDS & INTEGRITY (POLICE) COMMITTEE Tuesday, 3 June 2025

Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Tuesday, 3 June 2025 at 11.00 am

#### **Present**

#### Members:

Michael Mitchell (Chair)
Tijs Broeke
Melissa Collett
Alderman Professor Emma Edhem
Florence Keelson-Anfu
Naresh Sonpar

#### In attendance:

Jason Groves Jacqui Webster

#### Officers:

Richard Riley CBE - Town Clerks Department
Charles Smart - Town Clerks Department
Rachael Waldron - Town Clerks Department
Raquel Pinto - Town Clerks Department

## **City of London Police**

Paul Betts City of London Police Sanjay Anderson - City of London Police - City of London Police Erica Doran - City of London Police Carly Humphries Kate MacLeod - City of London Police Olivia Hogman - City of London Police - City of London Police Dan Lambert Helen Isaac - City of London Police

#### 1. APOLOGIES

Apologies were received from Deborah Oliver, Jason Groves and Jacqui Webster. Members noted that Jason Groves and Jacqui Webster were observing online.

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

There were no declarations.

#### 3. TO ELECT A DEPUTY CHAIR

The Committee proceeded to elect a Deputy Chair in accordance with Standing Order 26(6).

**RESOLVED**, - That, Deborah Oliver, being the only Member having indicated their willingness to serve, was duly elected Deputy Chair for the ensuing year.

#### 4. MINUTES

**RESOLVED,** – That the public minutes and non-public summary of the meeting on the 6 February be approved as an accurate record.

#### 5. PUBLIC OUTSTANDING REFERENCES

The Committee received a report of the Town Clerk with the Committees Public Outstanding references.

Members noted with regards to the dashboard, that progress has been made with the police authority team, and the new reporting tools and problem statement packs have been developed. The Chair asked that the action remain open until full reporting was complete.

The action relating to the networking meeting has been completed and Members agreed this is now closed.

With regards to the University of East London research, there have been some delays to this, and Members would receive an update by email later this month, with a fuller update in September.

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

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

Questions were raised about how progress toward being the most inclusive police force was measured. Members asked for clearer, high-level indicators and outcomes to assess impact both internally and externally. Officers acknowledged the difficulty in measuring cultural impact and behavioural change. They were working with academia and national teams to develop an evaluation framework and are using external assessments like the Inclusive Employers accreditation (currently rated Silver).

Members stressed the importance of setting measurable goals to avoid circular conversations and to track progress meaningfully.

A Member asked for more structured engagement with underrepresented groups, including early outreach through schools and support for those with special educational needs.

Concerns were raised about the accuracy and relevance of demographic data, particularly regarding ethnic minority and gender representation, and the need to reflect the broader London workforce.

The Committee agreed on the need for clearer outcome measures, better packaging of existing efforts, and continued collaboration to define and track meaningful impact.

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

7. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q4**Members received a report of the Commissioner which provided an update of professional standards, conduct, and vetting of the fourth quarter of 2024.

Members enquired if Schedule 3 cases were more serious, which officers clarified they typically involve delays or missing updates, not severity. Officers suggested updating the glossary of terms for new members to define special terminology from professional standards.

In response to a question about the vetting progress, Officers confirmed all staff were vetted on entry and re-vetted annually, with no backlog and 12 applications under review. The Chair asked how this progress would be sustained; and Officers assured that vetting was well-monitored through the Police's Strategic Board and dedicated leadership.

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

8. **SUMMARY OF ACTION FRAUD PUBLIC COMPLAINTS DATA - Q4 2024/25** Members received a report of the Commissioner which provided a summary of Action Fraud complaints data from Q3 2024-2025.

The Chair asked whether the new FCCRAS system would reduce complaint resolution times. Officers explained that while there may be an initial increase during the transition, the system was designed to improve user experience and communication, which should reduce complaints. The Chair also asked if there were internal triggers for delays; Officers noted that Schedule 3 cases have set timeframes, but non-scheduled cases do not, therefore Officers agreed to look into this matter. Concerns were raised about long resolution times, with Officers committing to producing a deep dive into national averages and case types for a future meeting.

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

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

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

Members noted the 10% drop in stop and searches, with a strong 49% positive outcome rate. Clarity was sought on what counts as a positive outcome and Members asked that the juvenile data is broken down by age. Disproportionality rates were reviewed, Members noted that Black disproportionality had slightly decreased, while Asian disproportionality rose, prompting Members to request that these numbers were investigated as well as checking current trends, which Officers agreed to look into. Officers explained outcomes included more than arrests and that fewer, more targeted searches reflected better officer judgment. The impact of new NPCC guidance was also noted.

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

# STOP & SEARCH AND USE OF FORCE DATA - APRIL 2024- MARCH 2025 Members received a report of the Commissioner which reviewed the stop and

search and use of force for the financial year 2024/2025.

Members also asked that the juvenile data is broken down by age for this report.

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

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

The Committee received a report of the Town Clerk which provided Members with a summary of the complaints and allegations concerning the City of London Police and the Action Fraud reporting service for the year 2023/24.

Members raised concerns about the 28-day average to contact complainants, noting the risk of fading memories and irrelevant evidence. Officers explained that this figure was skewed by Action Fraud data, and the actual average was 4 days: three for Action Fraud and five for general complaints, thanks to process improvements. Members suggested presenting data quarterly and visually to better show trends, as this report was now a year old. Officers noted delays in receiving data from the IOPC and agreed to pick this matter up with IOPC as well as explore trend reporting further.

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

# 12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE** There were no questions.

# 13. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT** There was no urgent business.

#### 14. EXCLUSION OF THE PUBLIC

**RESOLVED**, – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items 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.

#### 15. NON-PUBLIC MINUTES

**RESOLVED**, - That the non-public minutes of the meeting on 6 February 2025, be approved as accurate record.

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

Members received a report of the Commissioner which provided the non-public appendices to the professional standards, conduct and vetting update. This item was considered in conjunction with item 7.

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

The Committee received a report of the Commissioner with an update on the results of the City of London Police Staff Survey.

## 18. POLICE CONDUCT REVIEWS - RANDOM SAMPLE

Members received a report of the Commissioner which provided a random sample of police conduct reviews.

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

There were no questions.

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

There was no urgent business.

The meeting ended at 12.47 pm				
Chairman				
Chairman				

Contact Officer: Raquel Pinto Raquel.Pinto@cityoflondon.gov.uk

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# \genda Item .

## **PUBLIC OUTSTANDING REFERENCES**

8/2023/P	7 <sup>th</sup> 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. This action will remain open until the full reporting is complete.
	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. There have delays to the University of East London research and an update can be provided at the meeting.
	June 2025 – Item 7 Professional Standards, Conduct and Vetting Update Q4	Officers agreed to update the glossary of terms and define special terminology for professional standards.	PA Director	Officers continue to work on updating the glossary.
	June 2025 – Item 8 Summary of Action Fraud Public Complaints Data – Q4 2024/25	Officers agreed to undertake a deep dive into national averages (criminal vs non-criminal) at a future meeting, once the report from X was published.	Commissioner	Verbal update to be provided at October's meeting.

## PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

June 2025 – Item 9	Officers agreed to investigate	Commissioner	Verbal update to be provided at
Stop & Search and	disproportionality data as well as trends,		October's meeting.
Use of Force Data -	and report back.		
Quarter 4 2024/25	'		

## **City of London Corporation Committee Report**

Committee(s):	Dated:
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Professionalism and Trust Committee – For information	14 <sup>th</sup> October 2025
Police Authority Board – For Information	10 <sup>th</sup> December 2025
Subject:	Public report:
Equity, Diversity, Inclusivity Update	For Information
, , , , , , , , , , , , , , , , , , , ,	
This proposal:	People are safe and feel safe
delivers Corporate Plan 2024-29 outcomes	·
Does this proposal require extra revenue and/or	No
capital spending?	
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the	N/A
Chamberlain's Department?	
Report of:	Commissioner of Police
Report author:	Det Supt Kate MacLeod

## Summary

With all of our Equity, Diversity, Inclusivity (EDI) Strategy actions now well underway, the Inclusivity, Culture and Organisational Development (ICOD) team continue to make progress against our Implementation Plan, 3 substantial actions have been completed this period and are described within this paper.

Since the last reporting period, we have evolved our work on evaluation to incorporate measures to better understand the impact of our initiatives, by the first quarter of next year this will also include behavioural change. A summary is provided of the Inclusivity Programme, delivered to 227 participants over this period. Challenges relating to attendance / compliance have been identified and are being addressed via our internal governance and scrutiny channels. Also delivered at our EDI Strategic Board was a further 'problem statement' around forcewide completion of Equality Impact Assessments (EIAs). Again, recommendations have been approved and plans are underway to tackle this concern robustly.

The latter months of 2025 will see some significant events taking place for CoLP, reflecting our ongoing commitment to EDI. October will see us hosting the National Black Police Association conference, taking place at venues within the Guildhall over a 3 day period, where we will be welcoming over 300 guests from across Policing. We are also planning a number of listening circle events over the forthcoming months to help us understand some cultural issues in force as well as addressing the impact of National unrest for certain groups. We will also be progressing our priority work on Business Analysis, with dedicated support in place to help us better understand our work on demand and capacity.

## Performance against 2025-26 prioritisation

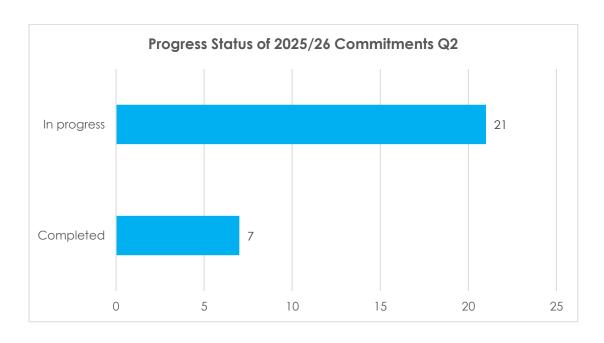
Stemming from our EDI Strategy, there are 76 actions across four priority pillars, 28 (37%) of these had been prioritised for delivery in 2025/26. Of the remaining actions, 18 (24%) of these are medium priority with 30 (39%) low priority. This grading had been consulted on widely, including with PTC members, and was signed off by our Chief Officer Team.

Since the last reporting period, all of these actions are now underway. However, we have revisited our forecast as part of our recent business planning exercise and suggest that a more realistic forecast would lead to the 28 'high priority' actions being completed slightly later than planned, by the first quarter of 2026 rather than final quarter of 2025.

Significant pieces of work completed this quarter include publication of our Public Sector Equality Duty report (as part of our Statutory Obligations), review of the Staff Networks, and the delivery of EDI training to our Senior Leadership team. Our risk remains around delivery of our commitment to developing a robust evaluation framework. While this action has been progressed, this has been at a slower pace than anticipated.

## **Delivery Overview and Progress Status this Quarter**

Actions status	Q1 (Actual)	Q2 (Actual)	Q3 (Forecast)	Q4 (Forecast)	Q1 2026
Completed	4	<mark>7</mark>	12	23	28
In progress	20	<mark>21</mark>	16	5	0
Not started	4	0	0	0	0

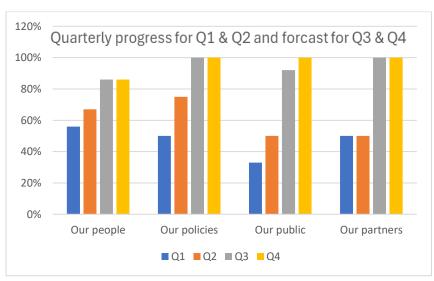


## **Progress by Pillar and by Quarter**

The following progress table 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 (Actual)	Q3 (Forecast)	Q4 (Forecast)
Our People	56%	67%	86%	86%
	(18 total actions: 3 completed, 14 in progress, 1 not yet started)	actions: 6	(18 total actions: 13 completed, 5 in progress)	(18 actions, 13 completed, 5 ongoing)
Our Policies	50%	50%	100%	100%
	(2 total actions: 1 completed, 1 not yet started)	(2 total actions: 1 completed, 1 in progress)	(2 total actions: 2 completed)	(2 actions, all completed)
Our Public	33%	50%	92%	100%
	(6 total actions: 0 completed, 4 in progress, 2 not yet started)	(6 total actions: 6 in progress)	(6 total actions: 5 completed, 1 in progress)	(6 actions, all completed)
Our Partners	50%	50%	100%	100%
	(2 total actions: 2 in progress)	(2 total actions: 2 in progress)	(2 total actions: 2 completed)	(2 actions, all completed)

The following graph shows the same progress pictorially, with actual progress for the first two quarters and forecast for the latter two.



2025/26 actions completed this quarter	Summary of results	
4.1 Content and Timetable for leadership training to be agreed	Senior leadership training delivered by Exeter University, 'worldview.' Police leadership	
	programme being rolled out.	
11.1 Complete a review of staff networks	This review and report has been completed and delivered to the EDI boards.	
2.8 Delivery against statutory requirements (including PSED)	PSED report completed and gender pay gap updated (1.6%)	

## <u>Update on Successes, Issues and Risks</u>

## **Ongoing delivery of Our Inclusivity Programme**

Since the last board, 10 sessions have been delivered to 227 people, a breakdown of these follows, with more detail relating to learning outcomes to be found on page 2 of Appendix A.

- Understanding Extreme Ideologies (55 attendees)
- Focus on Deaf Awareness (55 attendees)
- Ethical Dilemmas (8 attendees)
- Focus on Bi-Polar (41 attendees)
- Focus on Andropause (68 attendees)

During this reporting period, we have also created a new evaluation form which includes both Level 1 and Level 2 feedback. As such, we are moving beyond capturing that which is simply reactionary to also incorporate knowledge shift and behavioural change (events which took place prior to 11<sup>th</sup> June were evaluated using the old format). Our new approach to evaluation is presented at Appendix A in its entirety. We are now able to quantify the knowledge gain of our participants, our next steps are focusing on how we capture resultant change in action, attitude (with follow up conversations) and then onwards to impact.

## **Inclusivity Programme and Compliance**

We have also been able to advance our work on our Inclusivity Programme compliance rates this quarter. It is mandatory for all of our officers and staff to complete one module every 6 months as minimum, but we have not previously had the systems in place to effectively record or report on attendance. We identified that this was an issue when completing a review of our data earlier this year, the need to ensure effective compliance was also highlighted within feedback from our 'Inclusive Employers' accreditation, which stated we need a more robust, forcewide approach to monitoring participation levels.

Appendix B includes the most recent 'Problem Statement' pack which we presented at our EDI Strategic Board in August, these 'statements' are driven not only by our EDI Strategy, but also draw on themes identified from our staff survey, cultural audits, Staff Networks and other sources.

To inform this pack, we conducted a thorough, manual trawl of our data and found that the Programme attendance figures are a concern, with forcewide compliance sitting at 32% (a total of 491 colleagues had completed two modules in 2024/25). However, this must be strongly caveated with the limitations on the recording of our data. For example, we have since been made aware of many colleagues who had attended or 'watched back' online programmes but had not followed steps to ensure this was captured on our training recording systems.

When we drilled down further into the data, we found some interesting trends:-

- Officers from frontline roles were less likely to complete the modules than other areas
- Officers were less likely than staff to complete modules
- More junior officer / staff ranks were less compliant, as were those with less than one year of service
- Males had lowest compliance across all directorates, ethnicities and employee types

We have made a series of recommendations to address these concerns, including improving accessibility, asking specific departments to create training improvement plans and ensuring the data is monitored within our governance structure. Alongside this, we are also improving our forcewide communication on how to complete modules and clarifying the process for recording attendance.

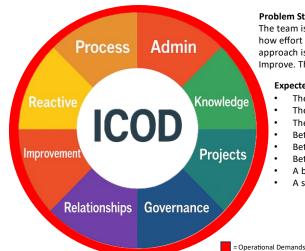
## **Business Analysis**

A business case was submitted to our Chief Officer Team earlier in the year requesting dedicated analytical support to help the ICOD team better understand our demand and capacity. The nature of much of our work in this space is non-transactional and difficult to quantify, as is the resultant impact. As a result of this request, a full-time Business Analyst was committed to Professionalism and Trust over a 6 month period to provide structured support in helping us understand our capabilities.

Whilst ICOD are the initial focus, a systems-thinking approach means that workstreams and outcomes will not be considered in isolation but as part of a connected system where our activities, outputs and challenges influence- and are influenced by- other teams and directorates. This approach to understanding our demand supports our internal business planning process and refreshed operating model following the Corporate Services Review. The 'slide grab' below shows the intended outcomes for this piece of work.

# Evidence-Based View of Demand & Capacity





#### **Problem Statement:**

The team is managing a diverse workload but lacks a clear picture of demand, how effort aligns to value & where inefficiencies may lie. A structured approach is needed to understand the work the team does and opportunities to Improve. This will be achieved through a capability review.

#### **Expected Outcomes of the Capability Review**

- The ability to identify pressures & imbalances
- The ability to show effort versus value
- The ability to identify opportunities for improvement
- Better and more informed planning
- Better and more informed prioritisation
- Better and more informed resource utilisation
- A better 'customer' experience
- A stronger contribution to achieving the policing plan priorities



A trusted and inclusive police service, keeping the City of London safe and transforming the national policing response to fraud, economic and cyber crime

Initial observations suggest a number of areas which, with additional focus, could improve our productivity and lead to efficiency savings including, but not limited to:-

- Forcewide awareness of ICOD services and future engagement planning
- Improving tasking and co-ordination functions
- Increasing access to / more efficient handling of data

Once the review has been completed we will be able to share further detail at this Committee.

## **Listening Circles**

We are conscious that a number of external events are impacting on policing in the current climate. The recent Supreme Court Ruling on Gender, ongoing political tensions around Immigration and International Conflicts continue to impact not only our operational delivery but also our internal culture and sense of well-being.

We have previously used 'listening circles' to good effect in our force, our approach being recognised nationally by the UK Police Federation as innovative practice<sup>1</sup>. Listening Circles aim to provide a non-judgmental space for employees to speak about and share experiences about a particular issue. The purpose is to understand concerns and discuss tangible solutions to enhance the working environment.

On 16 April 2025, the Supreme Court reached a legal ruling that the terms 'man', 'woman' and 'sex' contained in the Equality Act 2010 refer to biological sex. The national police chief's council shortly afterwards released Interim Guidance on searching by transgender officers and employees of the police and the searching of transgender detainees. Since the ruling, Professionalism and Trust has been leading working groups to ensure we are meeting our legal obligations, at the same time supporting colleagues to ensure this ruling has thoughtful interpretation.

<sup>&</sup>lt;sup>1</sup> Listening circles empower female officers and staff to help drive change

Through this group, it was raised that a Listening Circle would be useful. Taking place on 8<sup>th</sup> July, it was opened by our Commissioner and attended by over 20 colleagues. Key themes included future use of gender neutral facilities (including changing rooms and showers), preservation of safe spaces for women and concerns around inadvertent 'outing' of trans colleagues. A number of actions are being taken forward, including those relating to Policy reviews and also our Future new Estate.

Over this reporting period we have also delivered a listening circle for those who have been on extended periods of leave. This event was open to men, women and non-binary colleagues to better understand experiences of those on maternity and paternity leave, also supported by our Parenting Support Group Sponsor (and therefore linked to our actions on supporting our Staff Networks and Associations). The feedback has been positive and a number of actions taken forward- again, largely relating to improvements in policy and procedure.

Finally, ICOD have been supporting the work of our Professional Standards Department (PSD) on developing a future listening circle focusing on female colleagues who have experienced and/or witnessed inappropriate behaviour by men in the workplace. As we continue to refine our internal performance frameworks and indicators across our areas of work, part of this focus is on ensuring better connectivity between our areas to identify themes and put in place joint solutions; this initiative being a working example.

#### **Training for Senior Leaders**

A critical area of feedback from our Inclusive Employers accreditation, and one where they identified that some relatively simply short-term gains could be achieved, was around the awareness and training of our Senior Leadership Team on EDI. Although there were no immediate needs were identified as part of their assessment, they did note that some awareness training, pitched at the right level, could help our leaders understand the benefits of understanding EDI (including return on investment), to help enhance their engagement with our EDI Strategy and overall ambition to become one of the most inclusive and trusted forces in UK policing.

Working with Exeter University, ICOD designed a half-day programme which was delivered across 2 sessions to 23 delegates in July. It aimed to:-

- Develop awareness of the main theories and research into intercultural awareness and communication
- Explore participants own self-identity and worldviews
- Consider the diversity of worldviews
- Consider how bias and privilege may exist both consciously and unconsciously
- Explore workplace specific assumptions and expectations
- Develop skills to support intercultural communication in the workplace
- Explore ways to resolve miscommunications and work well together

We are currently evaluating this work and deciding our next steps to ensure this learning is embedded and continuous. However, initial observations show a significant knowledge gain of approximately 40%. We continue to work with Inclusive Employers on quantifying our 'return on investment' which we believe will act as a helpful motivator in this area.

## Reinvigorating our Youth Independent Advisory Scrutiny Group (YIASG)

We have reviewed and amended our YISAG 'Standard Operating Procedure' (SOP), once the Equality Impact Assessment has been finalised we will be on a position to publish this. We continue to see a good representation of attendees at the meetings and are currently running a recruitment campaign at City-based schools and youth clubs in order to attract even more.

On 9<sup>th</sup> April 2025, six YIASG members went to Gravesend, the base for National Public Order training. The purpose of this trip was to explain how police deal with protest and other public order incidents in order to get their views and feedback after witnessing our tactics firsthand. Their insights, which were passed to both the Metropolitan Police Training Centre lead and our own Public Order teams who were also in attendance, were received positively.

On 5<sup>th</sup> June, the group attended a CoLP Cyber Security Workshop, where they were asked to critique a presentation used by our teams to help improve awareness and education in schools. They provided feedback in person and also using Microsoft Teams forms post event, commenting that they had benefitted from learning more about security of personal data and the risks of social media. Furthermore, our Cyber team reported that the feedback was incredibly valuable in ensuring the correct pitch and level of detail, noting that the participation of the YIASG 'will contribute to improving national security and ultimately help keep the public safe'.

It is important that we maintain this momentum as we make strides in the 'Our Public' strand of our EDI Strategy.

## **Risks and Challenges**

## **Responding to Emergent Issues**

Although we now have a clear plan of action to complete to deliver against our EDI Strategy ambitions, this can be challenged when the need arises to respond to events outside of our control, such as the Supreme Court ruling on gender definition or recent anti-immigration protests. While we complete a 'PESTELO' analysis, much of our work in this area is difficult to predict. The shift changes around the popularity of EDI externally are significant- although our commitment remains solid.

Our progress against the Police Race Action Plan continues and will be showcased in part when we host the National Black Police Association conference in October. At the same time, the National Team are asking all forces to complete a 'maturity matrix'

between now and September 2026. They acknowledge that this is a considerable piece of work requiring analytical support. A visit to CoLP from the NPCC Lead for this, ACC Sarah Johnson, took place in September and we were able to discuss requirements and expectations. It is suggested that future HMICFRS Inspections will use the return produced by forces to inform progress against all things EDI- so again, an important piece of work which will need to be reflected in our plans.

## **Outstanding Equality Impact Assessments (EIAs)**

ICOD have been made aware that many of our SOPs have been published without EIAs or, where they have, on occasion, these are not fit for purpose. Of a total of 234 SOPs, 44 have been published without any EIA and 60 have been published with a 'no EIA required' caveat. On identification of this issue, ICOD raised this as one of our quarterly Problem Statements requiring action (see page 6 of Appendix B) at our internal EDI Strategic Board. A number of recommendations were agreed and are now in train to address this issue including delivery of training on how to complete EIAs, refreshing the EIA template (benchmarking this with the Corporation), improving forcewide knowledge of the process and ensuring all understand their responsibilities in this area.

## **Measurement our Impact**

At the last PSIC board meeting, we agreed that we would start reporting against the metrics, as detailed (and previously signed off) within our EDI Strategy. We will continue to closely monitor and identify any issues which we need to address and/or themes requiring further attention. While we are not yet able to report on all of the metrics, the pack at Appendix C provides the first iteration of this.

We have been explicit in stating that 'Measurement', albeit a priority for us, is not something we will be able to do extensively until our second year. As such, this remains a work in progress.

## **Appendices**

Appendix A: Inclusivity Programme Evaluation Pack April-June 2025

Appendix B: EDI Problem Statement Pack, August 2025

Appendix C: EDI Strategy – Measurement Pack DRAFT October 2025

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# **Appendix A**

# Inclusivity Programme Evaluation April – June 2025 Level 1&2 Feedback

Event name	Event Dates	Outline of event
Understanding Ideologies (Face to Face)	25 <sup>th</sup> April/6 <sup>th</sup> May/13 <sup>th</sup> May/5 <sup>th</sup> June/6 <sup>th</sup> June	The session gave an historical timeline of religious and political ideology. It explored how these points in history have shaped the world we see today and how the context is not explored in the mainstream narrative, often creating echo chambers which can lead to extremist thoughts and terrorist attacks across the world.
Focus On – Deaf Awareness (Online)	6 <sup>th</sup> May	The speaker highlighted the importance of understanding and accessibility for the Deaf community and understanding the different levels of hearing loss. Delegates were also given a basic lesson in sign language and encouraged to further their skills.
Ethical Dilemmas (Face to Face)  Page 24	29 <sup>th</sup> April/17 <sup>th</sup> June (cross over to new format)	This session enabled Supervisors/Managers to have time out to reflect on their own personal decision making processes and to be able to facilitate Ethical Conversations with their teams and others in an objective way underpinned by the Code of Ethics. Delegates had an opportunity to review some case studies and consider both the legal and ethical implications
Focus On – Bi-Polar Disorder (Online)	12 <sup>th</sup> June	The session promoted understanding of Bipolar Disorder; how to fully recognize the symptoms of Bipolar and foster a supportive environment for those affected and support colleagues who care for those affected.
Focus On – ADAM androgen deficiency aging male (Online)	25 <sup>th</sup> June 2025	The session enabled delegates to understand what Andropause is and how it differs from menopause, They learnt how to recognize the symptoms of Andropause and who is affected and how to support themselves and others with related health concerns.

# Focus On...Ideologies linked to Extremism— Level 1 & 2 Impact



# **Learning Engagement**

81%
Said a complex subject was very clearly presented

68%

Sgid the training was extremely helpful in enhancing their understanding

25

# **Attendance Figures**

Total Attendees **55** 

36 Police Staff19 Police Officers

O Corporate Services

**8** Local Policing

16 National Lead Force

**21** Specialist Operations

## **Satisfaction Rating**



## **Knowledge Gain**

Knowledge Level Before:

2.32/5

Knowledge Level After:

3.73/5

Knowledge Gain

+60% f



# **EDI Strategy Considerations**

## Session Details

Date: Q2 2025 Time: 09.45 – 12.30 Speaker: Zunaid Patel EDI Strategy Pillar: PEOPLE

- 1. Communication needed on how to access support via welfare networks.
- 2. Identify case studies to assist with learning opportunities
- 3. Supply a mechanism for people to get further advice

# **Next Steps**

Host further sessions to develop understanding in line with Colp core values of Professionalism and Compassion

## Focus on Ideologies linked to Extremism: Additional Comments



The historical background helped me better understand current situations.

It could be longer as there is so much content to be discussed.

I really appreciated the history and timelines of important events

age

Really good presentation and as such has made me want to learn more, with the purchase of one of the books from the reading material list."

It was useful understanding how people become radicalised

A good topic to learn



# Focus On...Deaf Awareness – Level 1 & 2 Impact



# **Learning Engagement**

**82%**Felt confident trying new sign language skills

91%

Learnt new things about the different levels of hearing loss

**73**%

Said the session exceeded their expectations

## **Session Details**

Date: 06 May 2025 Time: 13.00- 14.00 Speaker: Lucy Deeble

Speaker: Lucy Deeble
EDI Strategy Pillar: PEOPLE/

**PUBLIC** 

# **Attendance Figures**

Total Attendees **55** 

38 Police Staff17 Police Officers

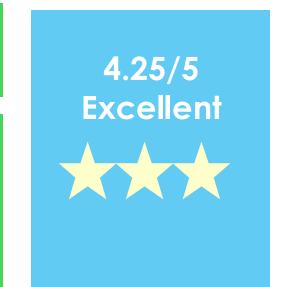
**3** Corporate Services

3 Local Policing

19 National Lead Force

20 Specialist Operations

## **Satisfaction Rating**



## **Knowledge Gain**

Knowledge Level Before:

N/A

Knowledge Level After:

N/A

Knowledge Gain

N/A



# **EDI Strategy Considerations**

1 Internal communications needed on how to access the SignVideo App for officers

**2** A forum for practicing BSL was requested by attendess

# **Next Steps**

- ICOD to link in with SPoC for Sign Video
- 2. ICOD to link in with CoLP BSL SPoC re opportunities for practice sessions



## Focus On Deaf Awareness: Additional Comments

I discovered different resources and social engagement opportunities

I enjoyed Lucy's lived experiences as a CODA and how she is helping the deaf community

Thank You - I was interested as I have a family member who suffers from deafness

Page

I was nice hearing the questions asked, showing that more needs to be done for deaf awareness circumstances, especially with policing.

I now have basic skills to be able to interact more effectively

The session far exceeded my expectations. I really appreciated its practical nature and the fact it was geared towards Policing



# Focus On...Ethical Dilemmas—Level 1 & 2 Impact



# **Learning Impact**

100%

Understand what an ethical dilemma is

100%

Understand the concept of facilitation

100%

Are confident in dealing with challenging situations

## **Session Details**

**Date:** Q2 2025

0

Time: 09.45 – 12.30

**Speaker:** Caroline Booth **EDI Strategy Pillar:** PEOPLE

# **Attendance Figures**

Total Attendees

2 Police Staff6 Police Officers

3 Corporate Services

 $\mathbf{2}_{\mathsf{Local}}$  Policing

2 National Lead Force

Specialist Operations

## **Satisfaction Rating**



## **Knowledge Gain**

Knowledge Level Before:

3.67/5

Knowledge Level After:

4.67/5

Knowledge Gain

+27% f



# **EDI Strategy Considerations**

- 1. Consideration of the inclusion of Ethical Dilemmas on other leadership / management courses
- 2. More Ethical Dilemma content to be shared on CitiNet

# Next Steps

1.ICOD to discuss opportunity for input on existing training courses with L&D

2. ICOD to review CityNet content



## Focus on Ethical Dilemmas: Additional Comments

It helps to understand that not all situations are what we see at first. By accounting for ethical and legal circumstances we can come to a better way of making decisions

llearnt that I tend to actively listen to others, but at times, I need to have a more empathetic way of listening which I will be mindful of

It was an opportunity to reflect on my managerial decision-making process.

Page

ge 30

The trainer had a wonderful manner and facilitates conversation brilliantly. A credit to Learning and Development

By listening to the interaction and views of others, it clearly emphasises that everyone has a different approach.

It was a useful reminder on the benefits of not jumping into discussions too quickly.



# Focus On...Bi Polar Awareness – Level 1 & 2 Impact



# **Learning Impact**

**85%**Fully Understand what Bi Polar is

73%
Fully recognise the symptoms of Bi Polar

73%
Fully learnt how to create a supportive environment for thosewith and affected

## **Session Details**

**Date:** 12 June 2025 **Time:** 13.00- 14.00 **Speaker:** Eva Mair

**EDI Strategy Pillar:** PEOPLE

/PUBLIC

# **Attendance Figures**

Total Attendees
41

22Police Staff19 Police Officers

14 Corporate Services
6 Local Policing
11 National Lead Force
10 Specialist Operations

## **Satisfaction Rating**



# **Knowledge Gain**

Knowledge Level Before:

2.37/5

Knowledge Level After:

3.95/5

Knowledge Gain +67%

# **EDI Strategy Considerations**

- 1. Consider Inclusion of key messaging in other mandatory training for wider exposure, potentially in addition to First Aid Training
- **2.** Explore opportunities to introduce Mental Health Days separate to sick leave
- 3. Develop a summary page on CityNet to capture key points of session
- 4. More inclusion of MH topics in reasonable adjustments training and provision in the Sickness Absence Management policy specifically on MH absence
- **5.** Consideration of the impact of custody and arresting procedures f those with BiPolar consider expert input from Psychiatric Nurse / Clinician

# **Next Steps**

1.ICOD to discuss opportunity on existing training with L&D 2. ICOD to link with HR on SAM improvements 3. ICOD to link in with Custody around procedures for Bipolar and other MH conditions, noting national procedures 1. ICOD to introduce summary

pages for all sessions



## **Focus on Bi-Polar- Additional Comments**

Very well arranged and presentation also key.
Amazing our colleagues felt comfortable to talk about their experience.

Really insightful and really appreciate how safe the space felt to ask questions and share experiences

I really appreciated speakers sharing their lived experience and I think it helped me empathise more. I will keep this in mind when next talking to someone who discloses bipolar.

Page

Very enjoyable and informative.
The lived experience shared by
Eve and Rebecca is very
powerful

It was a really useful starting point - the more open we are, the more help sufferers will get.

Really grateful to the presenters for such an engaging and memorable session and to the team for arranging



# Focus On...Andropause – Level 1 & 2 Impact



# **Learning Impact**

# 100%

Understand what Andropause is and how it differs from menopause

89%

who is affected

85%

Understand how to support themselves and others with health concerns related to Andropause

## Session Details

S

**Date:** 25<sup>th</sup> June 2025 **Time:** 13.00- 14.00

**Speaker:** Majid Shabbir **EDI Strategy Pillar:** PEOPLE

# **Attendance Figures**

Total Attendees

68

32Police Staff36 Police Officers

13 Corporate Services

10 Local Policing

National Lead Force

35 Specialist Operations

## **Satisfaction Rating**



## **Knowledge Gain**

Knowledge Level Before:

1.81/5

Knowledge Level After:

4.23/5

Knowledge Gain
+133%

# **EDI Strategy Considerations**

- 1. Introduce Men's Health Advocates within CoLP / create a mens health chat or group
- **2.** Opportunity for 1 on 1 consultations for men's health issues (subsidised or otherwise) or similar 'drop ins'.

# **Next Steps**

1. ICOD to review the viability of re-launching a men's health forum

## Focus on Andropause: Additional Comments



Thanks for putting on, great to see spirit of sharing concern via the Menopause Action Group

Excellent session. I learnt so much- very high quality and affable expert presenterd

Excellent. Presented at the right level and easy to understand. Dr. Shabbir was very engaging and extremely knowledgeable

Page 34

It was an enjoyable and educating talk that I would highly recommend to others to participate in.

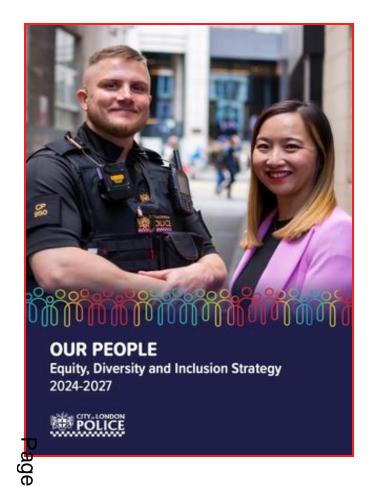
Really really informative, interesting and helpful input

Really good to have such a qualified person talk about it. Will help me be a better supervisor to others



# **Appendix B**

EDI 'Problem Statement' Pack, August 2025





# **Equity, Diversity and Inclusion Strategic Board**

August 2025

# **Summary of Problem Statements**

(Problem Statements 1-3 covered at May EDI Board, recap follows)

4) Our mandatory 'Inclusivity Programme' (2 modules per year) is not being completed by all of our people

5) Numerous outstanding EIAs (including SOPs published without EIAs) and lack of force-wide approach



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

# A Recap- Summary of Problem Statements from May 2025 EDI Strat Board



## **Problem statement 1**

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.

## **Problem statement 2**

Under-representation of female officers within City of London Police

# Decision

- To improve the number of female officers within the City of London Police, 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.

## **Problem statement 3**

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

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

NB- These were discussed at EDI Delivery Board (19<sup>th</sup> June 2025), verbal update to be given on actions in progress.





# **Our People – Commitment 4**

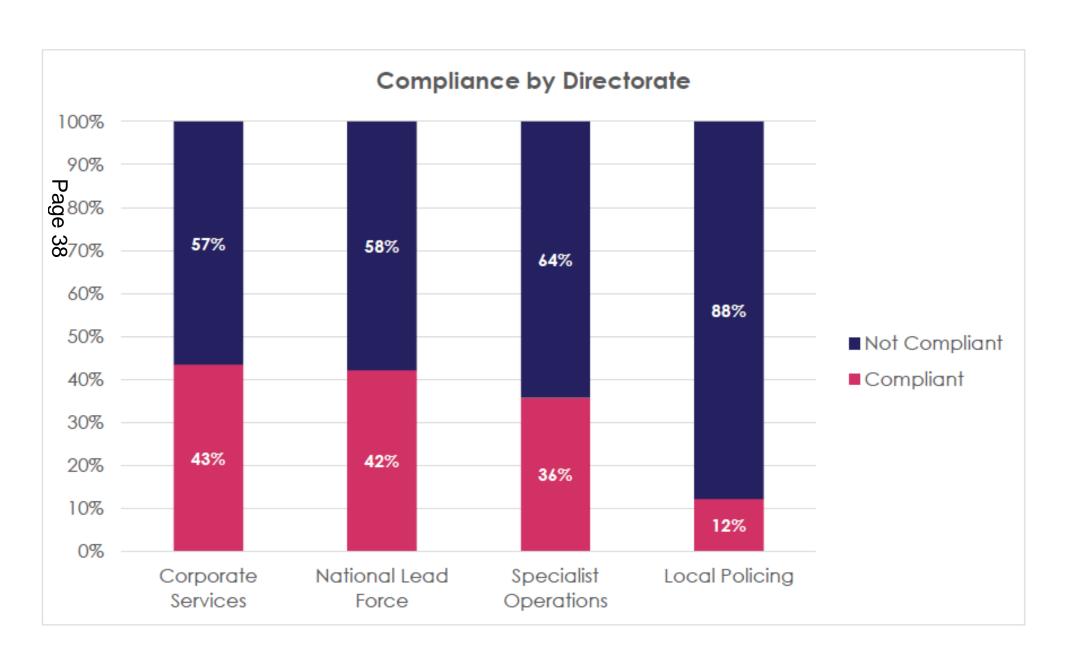
We will consistently deliver regular mandatory education on a variety of subjects pertinent to the cultures and lived experiences of our people, partners and public.





# **Problem statement 4**

Our mandatory 'Inclusivity Programme' (consisting of 2 modules per year) is not being completed by all of our people, current force compliance at 32%.



# **Analysis**

- In 2024/25, a total of 491 officers and staff completed the mandatory 2 modules of the Inclusivity
   Programme, making us 32% compliant\*
- Inclusive Employers, in their Sept '24 assessment, complimented our programme for its flexibility and innovation. However, EDI training needs to be taken seriously, with expectations that completion rates need to be far higher.
- Local Policing had the lowest compliance of any directorate.
- Males had lowest compliance across all directorates, ethnicities and employee types
- Officers are less compliant than staff
- More junior officer / staff ranks are less compliant, as are those with less than one year service

<sup>\*</sup> NB These figures include all attendance at in-person and online modules as well as the watching of recorded modules where this was noted on PDR objectives



# **Problem statement 4 Continued**

Our mandatory 'Inclusivity Programme' (consisting of 2 modules per year) is not being completed by all of our people, current force compliance at 32%



# **Decision**

- To see a quarterly improvement in completion figures across all Directorates, with the aim of achieving 80% by Quarter 1 (April) 2026.

# Existing actions within EDI Strategy

A	ction R	Ref Actions	Owner	Status
Ţ	3.1	Creation of 'Inclusivity Programme' as mandatory for all	ICOD	Complete
age	3.2	Creation of EDI calendar to inform activity	ICOD	Complete
39	3.3	Review of internal approach to engagement and creation of strategy (including intranet revamp)	ICOD	In progress
	3.4	Ongoing delivery of content and consistent evaluation	ICOD	In progress
	3.5	Sophisticated evaluation plan in place to ensure 'impact' is measured	ICOD	In Progress

# Considerations / Recommendations

- ICOD to complete quarterly Inclusivity Programme Evaluation (on going) and make recommendations around engagement.
- ICOD to circulate completion figures (including individual training record breakdown) to Directorate Heads each quarter.
- Directorates to examine reasons for lack of engagement ie topics, timing of sessions, lack of awareness of requirement, poor supervisory practices, and report these at the next EDI Delivery Board.
- Each Directorate to create a plan aimed at improving attendance (nb this could be linked to Staff Survey improvement planning)

# Our Policies – Commitment 11 –

We will review our policies to ensure compliance with equal opportunities through Equality Impact Assessments. We will also review our Equal Opportunities Statement.



to assist with reviewing EIAs before being

sent to the EDI manager for sign off.



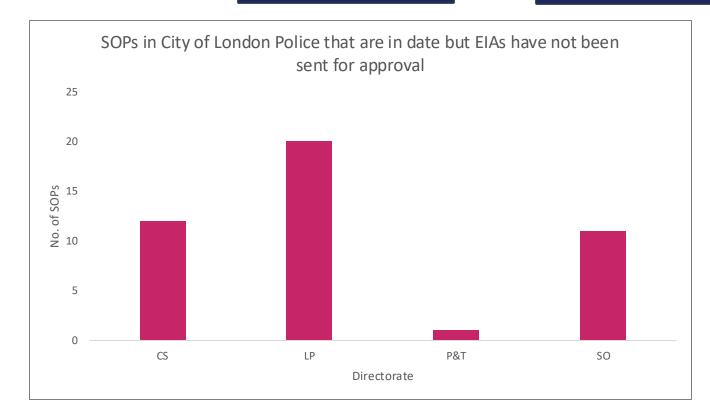
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Problem statement 5
Numerous outstanding EIAs (including SOPs published without EIAs) and lack of forcewide approach.

234 Total no. of SOPs

60 SOPs ElA not required

44 SOPs in date ElA not approved



## **Analysis**

There are a total of 234 policy procedures in force which include:

- 90 in date SOPs
- 40 SOP's out of date currently being reviewed.
- 44 published SOPs without approved EIA.
- 60 published SOPs but states 'no EIA required.' \*To be reviewed by EDI manager for accuracy and consistency.
- On average between 1-3 EIAs are sent to the EDI manager for sign off weekly.

## **EIA Process** Support and EIAs completed by the guidance from **policy author** and signed off by the policy department **EIA** owner. SPOCs. **E&I** manager Send Policy to the **E&I** sign off or Manager request for <u>equalityimpactassessm</u> further ent@cityoflondon.polic changes to be <u>e.uk.</u> made. **Policy author:** the person who has written the policy **Policy owner:** the business area lead or E&I manager signs off equivalent and sends for sign off by the business **EIA SPOCs:** departmental SPOCs who area lead or received COP EIA training (December 2024) equivalent.



Page

## **Problem statement 5 Continued**

Numerous outstanding EIAs (including SOPs published without EIAs) and lack of forcewide approach.



# **Decision**

- To increase awareness forcewide of the requirement FOR ALL to understand their role in completing Equality Impact
  Assessments and ensure that a consistent approach is in place.
- To monitor our progress on outstanding EIAs reviewed each quarter, utilising the EDI Delivery Board as appropriate.

# **Existing actions within EDI Strategy**

<b>Action Re</b>	Actions	Owner	Status
11.6	Review of Equal Opportunities Policy	ICOD	In Progress

• We recognise that equal opportunities needs to be considered throughout all of our policies and therefore EIA completion and compliance is an extension of this action.

# Considerations / Recommendations

- The EIA template requires refreshing. This can be completed with Inclusive Employers as part of the training contract in September but needs input from all Directorates to ensure it is fit for purpose.
- Review the Corporations version, following their revamp of their EIA processes.
- EIA process and coms page on SharePoint to reflect the Corporations one and give clarity to departments.
- Each Directorate to consider how they will ensure awareness and compliance across their respective business areas and report this into EDI Delivery Board where progress will be monitored.

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# Appendix C

# DRAFT EDI Strategy- Measurement Pack





Professionalism and Trust Committee Measures



age

44

ICOD Chief Inspector Caroline Hay MBE



A trusted and inclusive police service, keeping the City of London safe and transforming the national policing response to fraud, economic and cyber crime

# Disclosure rates

These have increased for all protective characteristics

#### **YEAR 24-25**

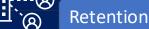
- Age (range)
- Disability
- Ethnicity\*
- Gender
- Religion or Belief
- 0% 19% 36%

## Our People



Grievances

There are currently 15 grievances.



Men and Women leaving at the same rate within acceptable boundaries.

10% of leavers are ethnic minorities



## EDI implementation plan

Plan is on track, 25% actions complete, 100% of actions in progress.





April 2025 'Authority, Respect & Courtesy' complaints already exceeds the number from 2024 (7 in 2024 and 9 in 2025) with Equality & diversity not far off the half-way mark (12 in 2024 and 5 in 2025). 45 breaches in Authority, Respect & Courtesy, 34 of them related to inappropriate language/lack of respect to colleagues and within those 34, 11 fell under inappropriate behaviour towards



#### Staff Survey

Engagement score has increased from 66% - 76%.

female colleagues.

Implementation plan currently at 25% - aim for 70% (2024 – 38%)



## Promotion

# Inspector promotion

11% of applications were from ethnic minorities (13).
7% passed interview (2)
18% of applications were from women (21). 20% passed interview (6)

#### **Staff promotion**

9% ethnic minorites raised in grade (1) 72% women (7)





#### **Policies**

5 key policies have been reviewed by Business Disability Forum and ICOD to ensure they are inclusive. With HR to action.

• A further 5 policies will be selected for 2026



# Gender Pay Gap

The Public Sector Equality Duty Report was submitted late due to receiving the data late and then staff sickness.

Gender and Ethnicity Pay Gap increased from 1% to 1.6%.

 Aim to get this below 1% in 2025.







#### Public Confidence Survey

(awaits data)

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#### Engagement

- 36 DWO initiated community engagement activities took place across the period covering bike marking, Stop the Bleed, general community engagement, and crime prevention. This included 2 school engagement activities.
- Youth ISAG have held quarterly meetings and have fed into key areas such as stop and search and fraud.
- Aim to increase engagement by 10%





#### **Our Partners**



#### **Ethics Committee**

O Ethics Committees held (chair going through vetting)
On target for Q3.
Themes have been selected and national learning, including neighbouring forces, has been gained.



## Partnership Mapping

Partners mapped with a local policing work shop (see next slide). Further directorates to map.

Local policing would like to engage with:

- e-bike providers
- Mental Health providers
- ED Depts



Training from partners

Active Bystander training
341 attendees

Inclusivity
Anniversary event
120 attendees

Focus On sessions 759 attendees Mentivity sessions
55 attendees







## **Our Partners**

	FAITH GROUPS	COMMUNITY GROUPS	PEOPLE IN BUSINESS	SECURITY PROFESSIONAL S / GROUPS	BIDS	OTHER EMERGENCY SERVICES AND LEAD BODIES	CORPORATION OF LONDON	CoLP	OTHER
	Rabbi Morris	Middlesex Street Community Steering Group	980 Licensed Premises: Directors	Security Forums	BIDs	ВТР	PAB inc Richard Riley	COT – EAs/staff/of ficers	Schools
	City Belonging Faith Network: Jewish in the City	Beaubeaus Café:Youth	City HR Association	Don Randal – City of London Crime Prevention Association	Primera	NPCC	Comms inc Lisa Ward (Head of External Comms) and Mark Gettleson (Comms and Campaind Manager) and Chandni Tanna	PSD	Crime Prevention Association
$\tau$						NPCC Firearms			
	City Belonging Faith Network: Muslims in the	Mentivity Space (charity):	City Black Employee Resource	British Land: Andrew Conway, Security	East Central: Henry	MPS	Serious Violend	ce Board	Nationwide Cadet Forces
S	City National Association of Muslim Police	Training Residents Associations	Group Business Community	Director City Security		MPS Licensing	Street Cleansing	Cycle Leads	National Volunteer Cadet Team
			Bloomberg	Safer Business Network	Fleet Street quarter: Beth Nash	First Aid Nursing Yeomanry	FSB		Hackney and City Health and Mental Health Teams
			City Hotels	City Intel (Business Community)		Samaritans	CST		Hackney and City Adult/Child Social Care
	0000 000	0.000	000 0	Old Bailey		AA	Park Guard		Hackney and City Suicide Prevention Lead

			OTHER EMERGENCY SERVICES AND LEAD BODIES	CORPORATION OF LONDON		OTHER
Middlesex Street Community Steering Group	Security Forums	BIDs	ВТР	PAB inc Richard Riley	COT – EAs/staff/of ficers	Schools
	Mitie		St John's Ambulance	Environmental Health		Guiness Trust
	CIS		London Ambulance Service	Community Safety		Police Sport UK
	Vigilant		Home Office: Rob Hall and Ben Biddulph	Public Protection		Fitness First
	SIA: enforcement training and engagement		London Overground Security	Destination City		Reward Gateway
	Our Safer City		TFL	Parks and Gardens		24N
	UCL			Committees and Members		Buzz Gym
				Children and		Business
				Community		Disability
				Services		Forum
				Homelessness Unit		Circles: Rehabilitati on of Sex Offenders
				Emily Grant : Resident Newsletter		EIDA: Employers Initiative for Domestic Abuse
				VAWG		Publica
						Right to the City
						GAIA





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#### **City of London Corporation Committee Report**

Committee(s):	Dated:
Professionalism and Trust Committee – For Information	14 October 2025
Subject:	Public report:
Professional standards, conduct, and vetting Update Q1	For Information
This proposal:	CoLP impact the following
delivers Corporate Plan 2024-29 outcomes	Corp Plan outcomes:
<ul> <li>provides statutory duties</li> </ul>	Vibrant Thriving Destination-
<ul> <li>provides business enabling functions</li> </ul>	(Community Safety/ CT)
	Dynamic Economic Growth-
	(National Lead Force)
Does this proposed require entre revenue and/or	No
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	N/A
Chamberlain's Department?	
Report of: Commissioner of Police	
Report author: D/Supt Humphreys/PC Ann Roberts	
Professional Standards Dept	

#### Summary

- Overall, the volume of Complaints has increased in Q1 in comparison to Q4 (by 20 cases 49%). However, this remains below the national average in accordance to IOPC data. There have been 22 new Conduct Cases recorded this quarter (an increase of 13 (144%) from Q4).
- 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. Our forecasting expects that this may amount to four Gross Misconduct hearings over the next 6 months.
- Progress across the Vetting Action Plan has seen a shift in completed recommendations from 69% last quarter to 80% this quarter.

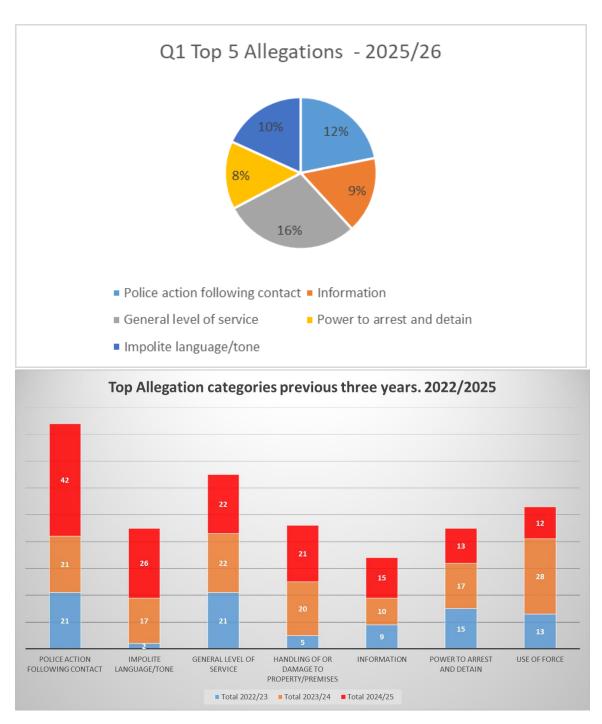
#### Recommendations

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 first quarter of 2025/26 (April-June).
- 2. This quarter the total number of CoLP complaint cases logged is 61.
- 3. This is separated into 17 dealt with under Schedule 3 of the Police Reform Act 2002 and 44 not within Schedule 3. This figure of 61 complaints is an increase of 20 cases compared against Q4 where a total of 41 complaints were logged: 14 under Schedule 3, and 27 not within Schedule 3. Compared against the same period (Q1) last year 2024/25 the total number of CoLP complaint cases logged was 30. (4 Schedule 3 and 26 not within Schedule 3).
- 4. Of the 93 allegations recorded during Q1 2025/26 the highest number were in the categories of: General level of service (15) Police action following contact (11) Impolite language and tone (9) Information (8) Power to arrest & detain (7)
- 5. This is an increase in allegations recorded against Q4 of 4 (4%).
- 6. Q1 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, Information and Impolite language and Tone.
- 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.
- 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. Power to arrest and detain has returned to the quarterly top 5 this period.



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 2024/25 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.

#### Q1 – Data examination: -

- 10. Analysis of the highest allegation categories (the latest Q1 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 power to arrest and detain (B) and communication type allegations which incorporates impolite language and tone (H) remain the highest areas of complaint type. This is consistent with National data in the IOPC bulletins. In Q1 40% Organisational type allegations were recorded (Q4 = 37%)
- 11. The total number of allegations finalised during Q1 is 93 compared to 66 in the previous quarter.
- 12. Of the 93 allegations finalised:
  - 28 Resolved
  - 48 Service provided was acceptable
  - 1 Service Not acceptable
  - 3 Not resolved/No further action
  - 3 No case to answer
  - 8 No further action
  - 2 De Recorded
- 13. The one allegation finalised where the Service provided was NOT acceptable relates to one case. Allegation type Bail, identification and interview procedures.
- 14. To note, cases often contain more than one allegation; the number of cases finalised in Q1 is 51, compared to 35 finalised in Q4.
- 15. Of the cases finalised 16 were logged as Schedule 3, and 35 were not under Schedule 3. There were no cases finalised under the previous regulations.

#### Conduct volumes, content, and performance –

- 16. During this quarter, 22 conduct investigations were recorded, and 11 investigations were finalised. There are currently 45 live conduct investigations, of which 20 have been assessed as Gross Misconduct. Of the matters assessed as Gross Misconduct Discreditable conduct is the highest allegation type and as previously predicted are moving away from matters of a sexual nature. The discreditable conduct matters are varied and include disclosure, social media use and behaviour(s) with colleagues. Most of these cases are complex and subject to lengthy investigation timescales. Newer conduct matters are varied and appear to be moving away from this allegation type and into Honesty and Integrity matters or Authority, Respect and Courtesy.
- 17.In total 11 Conduct matters have been finalised (Hearings/Meetings may have been held in a previous quarter):
  - 1 case Case to answer Misconduct Hearing Officer dismissed

- 1 case Case to answer Misconduct meeting Reflective practice.
- 1 case Case to answer Stage 3 proceedings Staff member dismissed.
- 5 cases No case to answer Reflective practice provided.
- 3 cases No case to answer No action.
- 18. During Q1 one Stage 3 Proceedings meeting was held with an allegation of Discreditable conduct. The staff member was dismissed without notice. One Misconduct meeting was held with the allegation of Use of Force. The outcome was reflective practice for the officer.

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

(i) The most recent HMICFRS report into the effectiveness of vetting and countercorruption arrangements in the City of London Police was conducted in force in October 2022 and published in June 2023. It graded the force as Requires Improvement in this area.

The department is now preparing for a HMICFRS Integrity Inspection due in 2026 (date not known however this could be from January 2026 onwards). In preparation, a Readiness Assessment has been completed against the HMICFRS assessment of 'Good'.

These recommendations are being progressed through a dedicated Action Plan with fortnightly Senior Leadership oversight and monthly reporting to Organisational Improvement Board.

- (ii) PSD have some evaluation gaps in understanding the impact of pro-active engagement work. We are reviewing good practice recommended to other forces by the HMICFRS which includes:
  - Training attendance to PSD and ICOD sessions and evaluation tools to understand the impact the training had on individuals.
  - Scenario-based PSD case studies focused on areas of concern highlighted through conduct data. This would involve a 3 stage-process:
    - 1) Scenario sent out to whole workforce to select one of a selection of options of how they would deal with a particular incident. This will provide a baseline understanding of how well employees understand the area of concern and what action they would take.
    - 2) Intervention through engagement on the topic area.
    - 3) Re-run of the scenario to track improvements around understanding and action taken.

#### Vetting:

19. The continuous improvement Action Plan for Vetting established in summer 2024 maintains to progress, with tangible improvements relating to productivity and service delivery. Currently, 80% of the actions set have been completed, and 20% 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.

#### **Overview of Action Plan:**

Actions	RAG Rating	Total			
	Very High				
Number of Actions	3	22	15	5	40
% of Total	15%	55%	37.5%	12.5%	100%
Completed	1	19	9	3	80 (%)
In Progress	2	2	3	1	20 (%)
Not Started	-	-	-	-	0

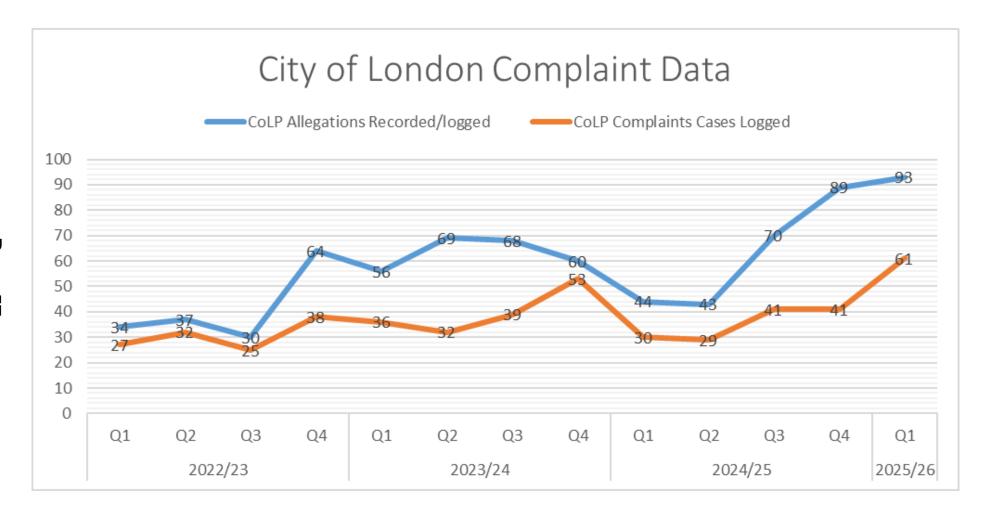
#### II. Forward look

20. Annual PSD Conference: On 6 and 7 October 2025, members of PSD SLT will be attending the national PSD conference. The conference will have updates from the Home Office on key national updates and the HMICFRS on upcoming force Integrity inspections.

#### 21. PSD Protect Engagement work:

As part of our response to the Angiolini Inquiry (Part 1) and broader work to support women in the workplace who experience misogyny or male-perpetrated abuse, PSD are hosting a listening circle. The session will be focused to understand how women feel about existing reporting structures in place and any barriers to raising concerns.

The listening circle is scheduled for 29<sup>th</sup> September 2025.



		Summary of public complaints data – Q1 2025/26								
Metric	Current quarter (Q1)	Previous quarter (Q4)	Previous year (Q1)	(%) change (Q on Q)	(%) change (Y on Y)	Comment				
Complaints – Schedule 3	17	14	4	21%	325%	A total of 61 cases were logged in Q1 2025/26. This is an increase of 20 cases (49%) against Q4 2024/25				
Complaints – not Schedule 3	44	27	26	63%	69%	The average number of cases logged over the previous 5 quarters is 40 per quarter, Q1 is above average.				

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Allegations	93	89	44	4%	111%	There were 93 allegations recorded in Q1 2025/26. This is an increase of 4 allegations from Q4 2024/25
						The average number of allegations over the previous 5 quarters is 68 per quarter. Q1 is above average.
Average time to log complaints (days)	4	4	1	0%	300%	Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.

Average time to contact complainant (days)	4	4	1	0%	300%	
Complaints finalised – Schedule 3	16	10	3	60%	433%	
Complaints finalised - not Schedule 3	35	25	13	40%	169%	
Average time to finalise complaint cases (days) – Schedule 3 (including subjudice time)	93	115	112 (Q1 2024/25 YTD)	19%	17%	Timeliness is taken from IOPC published bulletins and available retrospectively.
Average time to finalise complaint cases (days) – not Schedule 3	19	36	37	47%	49%	Q1 2025/26 data is available at time of writing but not published due to lack of national data
Applications for review sent to local policing body	1	2	1	50%	0%	
Applications for review sent to IOPC	0	4	1	100%	100%	

**Nature of allegations** – Of the 93 allegations recorded during Q1 2025/26 the highest number were in the categories of General level of service (15) Police Action following contact (11) Impolite language / tone (9) Information (8) Power to arrest & detain (7)

This is an increase in allegations recorded against Q4 of 4

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%

Q1 2025/26 contains 4 out of the above top allegation types. Police action following contact remains the highest allegation category and equates for 12% of all allegations logged.

Power to arrest and detain had dropped out of the top allegations at the end of the 2024/25 data, however has returned to the top 5 in Q1.

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 -

20% of complainant's ethnicity is recorded as Unknown and 22% 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.

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

	Summary of internal conduct cases and investigations- Q1 2025/26										
Metric	Number	Previous quarter (Q4)	# (%) change (Q on Q)	Comment							
New conduct investigations recorded	22	9	144%								
Total live conduct investigations	45	36	25%	Total live cases of which a number are sub-judice							
o.w. gross misconduct	20	18	11%	Live cases							
Conduct investigations finalised	11	5	120%								
Investigations finalised within <30 days	4	5	20%								
Officers and staff on suspension	14	11	%	Includes officer under IOPC investigation							
Officers and staff on restricted duties	6	5	%	Includes officer under IOPC investigation							
IOPC independent investigations	3	5	40%								

#### Accelerated misconduct meetings held Q1

None held

Misconduct meetings / hearings held Q1

Misconduct Hearing - None held

Stage 3 Proceedings (staff) - Discreditable conduct - staff member dismissed without notice

Misconduct meeting - One held. Use of Force - outcome - Reflective practise

#### Conclusion

- 22. 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 Q1 and compared to previous yearly data overall. Comparative data against 2023/24 to 2024/25 shows an increase on both complaint data and conduct matters. However, complaint numbers per employee remains below national average.
- 23. Allegations of "Impolite language/tone" have remained key focus areas for improvement. Several cases have been reviewed through BWV, in some instances it was identified that greater professionalism in communication is required. This has been raised through the PSD Working Group directly to senior PSD SPOCs and will be a feature on future engagement sessions.
- 24. Of the 93 allegations recorded during Q1 2025/26 the highest number were in the categories of General level of service (15) Police Action following contact (11) Impolite language / tone (9) Information (8) Power to arrest & detain (7)
- 25. Vetting operational delivery has continued to improve as outlined in the Vetting Action Plan. We continue to implement regulatory and APP changes, and ensure compliance in all areas through our PSD Performance Management framework.

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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)

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<u>Item Type</u>	Hospitality Item	Location type	<u>Directorate</u>	<u>Date</u>	Estimated Value	CoLP Participant(s)	External Organisation	Full description of Gift/Hospitality	Location details	Rationale
Hospitality Item	Reception	Guildhall/M ansion Hous e	Chief Officer Team	30/06/ 2025	25	Pete O'Doherty	City of London Corporation	Reception at Guildhall Art Gallery 30/06 1800-2100hrs for 'Revelaing the City's Past'	Guildhall Art Gallery	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments.
Gift Item  Page 67	Gift	Office premises (external organisation )	National Lead Force Operations	30/06/ 2025	30	Robert Mellor	Jon Dixon, Director of Strategy and Development, www.retailenergy code.co.uk	Bottle of Glenfiddich whiskey 70 cl	Sovereign Capital; First floor; 25 Victoria Street; London; SW1H 0EX	I was invited to give a presentation at a round table discussion of energy suppliers convened to discuss fraud against the energy industry. I gave an input on the fraud reporting process and the role of Action Fraud and NFIB. At the end of the meeting as I was leaving the person I had been liasing with gave me a bottle of whiskey an appreciation of my attending. This was not anticipated and unsolicited.
Hospitality Item	Institutional Anniversary Ceremony	Foreign embassy	Chief Officer Team	23/06/ 2025	0	Pete O'Doherty	Chilean Investigation Police Force	Institutional anniversary ceremony in commemoration of the 92nd anniversary of the Investigation Police Force of chile	Chilean Embassy London SW1H 9JA	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitment

Gift Item	Tracksuit and team shirt	Foreign location	Chief Officer Team	23/06/ 2025	45	Paul Betts	Police GB Women's Football Team	Mr Betts attended in his own time a Police GB Women's Tournament and was given a team shirt and track suit.	Marissa Resort, Lembruch, GERMANY	This is in keeping with his role as Deputy Director of GB women's Police Football team which supports and represents women in sport and policing.
Hospitality Item	Annual Ceremony of Remembera nce	Government premises	Chief Officer Team	19/06/2025	0	Pete O'Doherty	Metropolitan Police	Metropolitan Police Annual Ceremony of Remembrance which is being held on Thursday 19th June 2025, at Peel House, Aerodrome Road, Hendon, London, NW9 5JE.	Peel house, NW9 5JE	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitment
Hospitality tem	Meal at the British Security Industry Association (BSIA) awards event	Hotel	National Lead Force Operations	16/06/ 2025	245	Patrick Holdaway	British Security Industry Association	The BSIA hold an annual awards event in London, due to my long standing relationship with the BSIA I have been invited as a guest to attend.	Royal Lancaster London, Lancaster; Terrace, London W2 2TY	The NBCC are up for an award at the event, moroever it provides a great opportunity to network with security professionals.
Hospitality Item	Guildhall Pride	Guildhall/M ansion Hous e	Chief Officer Team	16/06/ 2025	25	Pete O'Doherty	City of London Corporation	Invited by City of London Corporation to annual Pride flag raising ceremony, followed by a reception	Guildhall	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitment

	Invitation to	Civic	Specialist	13/06/	50	Michael	General Officer	A spectacle of	Horse	
	the	building	Operations	2025	30	Dodge	Commanding	sound and colour	Guards,	
	Household	bulluling	Operations	2025		Douge	London District	featuring the	London	
									London	
	Division						and Major	Massed Bands of		
	Beating						General	the Household		
	Retreat (}inc						Commanding the	Division, Pipes		
	guest)						Household	and Drums,		
							Division	Duchess of		
								Edinburgh's String		
								Orchestra and the		
								Mounted State		
								Trumpeters		
								paying homage to		
								heroes of		
								literature, music		
								and more. Set on		
₩-								the historic Horse		
$\sigma$								Guards Parade in		
<del>Page 6</del> 9								the beautiful		
Φ								surroundings of St		
φ,								James's Park, the		
Ψ								Military Musical		
								Spectacular		
								recognises the		
								power of music as		
								a universal		
								language,		
								accompanied		
								moments of		
								reflection and a		
								stunning		
								pyrotechnic		
								finale. A		
								showcase of		
								stirring world		
								class military		

		music and precision drill combine in an unforgettable thrilling evening of the very best of British Military Music and pageantry.  Event includes a small reception beforehand in the GOC's Office at Horse Guards. The reception will start from 6pm	
Page 70		performance which will commence at 7.30pm and conclude by 8.45pm.	

Hospitality Item	20/20 Cricket evening	Office premises (external organisation )	Chief Officer Team	12/06/ 2025	25	Pete O'Doherty	Clue Software	Clue Software 20/20 Cricket evening 12/06	Clue Software	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitment
Hospitality Item	Launch of City Business and Investment Unit	Guildhall/M ansion Hous e	Chief Officer Team	11/06/ 2025	0	Pete O'Doherty	City of London Corporation	Launch of the new City Business and Investment Unit (CBIU)  Wednesday 11th June 2025 18:00 - 20:00 Guildhall, London, EC2V 7HH	Guildhall	Offered as part of Cmsr's role to attend events and functions. Invitation accepted
DHospitality PItem	Hotel room	Hotel	Corporate Services	09/06/ 2025	232	Patrick Holdaway	Liverpool BID	Liverpool BID have asked me to present at their business crime conference on my work ateh NBCC. They have offered to pay for my hotel room for the night.	Hilton Liverpool (City Centre)	The offer is genuine and reduces the demand on the tax payer. The event allows me to talk about the work of the NBCC.
Hospitality Item	Breakfast	Restaurant	National Lead Force Operations	05/06/ 2025	40	Lisa Maslen	Helen Clayton	Breakfast meeting with a business contact to discuss business crime.	VQ Bloomsbur y, Great Russell Street, London	Contact wanted an early meeting over breakfast to fit in with their schedule. Mutually beneficial to meet to discuss future working, also present Patrick Holdaway

Hospitality Item	Meal	Restaurant	Specialist Operations	04/06/ 2025	30	Paul Clements	Horwich Cohen Coglan Solicitors	Offer of lunch at the IVY Restaurant, City Garden on the 04/06/2025 from	IVY Restaurant , City Garden Dashwood	I am the Family Liaison Advisor / Coodinator for the CoLP. I arrange continuous personal development events for the force FLO's. I
								Steve WILLIAMS, Partnership Consultant and Events Manager at HCC Solicitors,	House, 69 Old Broad Street, London EC2M 1QS	have arranged for a speaker from HCC to provide an insight into their work with families of homicide and how they work with FLO's.
								New London House, 6 London St, London EC3R 7AD.		For the next CPD event in September they have also offered a meeting room and lunch for all attendees. They have been informed that the CoLP will offer nothing in return or referrals.
Hospitality Cltem	Dinner	Restaurant	National Lead Force Operations	03/06/ 2025	95	Lisa Maslen	High Streets UK	Dinner	The Grill on Fifth, Harrods, Brompton Rd, London	Offered by High Streets UK to welcome me to the role and introduce me to national BID CEOs
Hospitality Item	Lunch	Office premises (external organisation )	National Lead Force Operations	28/05/ 2025	12	Patrick Holdaway	Professor Martin Gill	A sandwich during a working lunch.	Institute of Directors (IoD), Pall Mall, London	I met an academic who was at the IoD to discuss my work around security, the only time free was lunchtime so they offered lunch.

Hospitalit Item	y Reception	Guildhall/M ansion Hous e	Chief Officer Team	27/05/ 2025	25	Pete O'Doherty	Corporation	An early evening reception to recognise the work of the volunteers who support the City of London Corporation.		Offered as part of role of Commissioner to attend such events, declined due to prior commitment.
Hospitalit Item	y Crimestoppe rs talk and reception	Office premises (external organisation )	Chief Officer Team	21/05/ 2025	25	Pete O'Doherty	Crime Stoppers	Crimestoppers Rewarding Partnerships event		Offered as part of Commissioner role to engage with partners/ stakeholders, declined due to prior commitment.
Hospitaliti Item Page 73	y Hotel room	Hotel	Corporate Services	20/05/ 2025	100	Patrick Holdaway	Lancashire Partnership Against Crime (LANPAC)	The organisers of an event in Lancashire where I am presenting have arranged a hotel room for me.	Hampton by Hilton, 2 Frontier Park, Frontier Avenue, Blackburn, BB1 3AL,	There is a cost to travel to Lancashire for the event, the organisers want to help to reduce that cost so are paying for a room.

Hospitality Item	Dinner	Guildhall/M ansion Hous e	Chief Officer Team	15/05/ 2025	100	Pete O'Doherty	Corporation	Deputy Henry Pollard and Paul Wright - Chief Commoner Elect and City Remembrancer - Dinner for informal discussion on matters of common interest. Offered as part of Commissioner role, declined due to prior engagement.		Offered as part of Commissioner role to attend such functions, declined due to prior commitment.
Hospitality Oltem	Breakfast Reception	Guildhall/M ansion Hous e	Chief Officer Team	15/05/ 2025	25	Pete O'Doherty	Corporation	Panel Discussion and Networking Breakfast Reception to mark Mental Health Awareness Week		Offered as part of Commissioner role to attend such events, declined due to prior commitment.
Hospitality Item	Hotel room and food whilst at the conference.	Hotel	Corporate Services	13/05/ 2025	150	Patrick Holdaway	Oris Forums	The organisers of a conference, which I am supporting with a presentation and a work shop, have arranged for me to have a hotel room. The event is over two days.	Chesford Grange Hotel Kenilworth Nr Warwick Warwicksh ire CV8 2LD	The organisers value my input so have looked to cover my costs. The event is for retailers so fits in my work at the NBCC.

Gift Item	It was a gift.	Hotel	National Lead Force Operations	13/05/ 2025	40	Patrick Holdaway	KFC Restaurant, part of the Yum Yum chain	A bottle of whisky.	Chesford Grange Hotel. Kenilworth , Warks	Whilst away at a conference the risk team at KFC presented me with a bottle of whisky in recognition of the support I had given them over the 6 years that I have been in role. I'm soon to leave my national role and retire, so they decided to buy me a gift as a thank you for all the support I have given them.  To refuse the gift would
- Nonitality	Reception	Guildhall/M	Chief Officer	13/05/	25	Pete	Corporation	Panel discussion		have been very awkward so I accepted the gift pending a decision from management. Offered as part of
OHospitality Oltem 75	кесерион	e e	Team	2025	2.5	O'Doherty	Corporation	and early evening reception for the Migration Museum 'The Art of Belonging: Migration Meets Culture in a Changing UK' Discussed by David Olusoga, Sathnam Sanghera, Es Devlin and Indhu Rubasingham Moderated by Reeta Chakrabarti		Commissioner role to attend such functions, declined due to prior commitment.

Hospitality	Dinner	Guildhall/M	Chief Officer	12/05/	100	Pete	Corporation	Dinner in honour		Offered as part of
Item		ansion Hous	Team	2025		O'Doherty	-	of Deputy Peter		Commissioner role to attend
		e				·		Dunphy The Chief		such events, declined due to
								Commoner 2024 -		prior commitment.
								2025. This dinner		
								will provide an		
								opportunity for		
								the Immediate		
								Past Chief		
								Commoner to		
								thank those he		
								has worked with		
								and to build on		
								relationships		
								established		
								through		
₩								hospitality events		
a)								throughout his		
<u>ф</u>								year in office.		
Hospitality	Reception	Guildhall/M	Chief Officer	08/05/	25	Pete	Corporation	Evensong to		Part of Commissioner role
tem		ansion Hous	Team	2025		O'Doherty		Commemorate		to attend such events,
1		e						the 80th		declined due to prior
								Anniversary of		commitment
								the End of the		
								Second World		
								War followed by a		
								reception		
Hospitality	Meal -	Bar/Pub	National	06/05/	23	Patrick	Auror	A working lunch	The Ned,	It was a networking
Item	working		Lead Force	2025		Holdaway			London	opportunity with the law
	lunch		Operations							enforcement lead for
										Australia, who was in the
										country, so provided a good
										opportunity to understand
										the opportunities to
										improve the policing
										response here.

Hospitality	Reception	Museum/Ga	Chief Officer	06/05/	25	Pete	HM Tower of		HM Tower	Offered as part of the
Item		llery/Cultura	Team	2025		O'Doherty	London	An opening event for a commemorative Poppies installation to mark the 80th anniversary of the end of the Second World War. Tuesday 6th May 2025 HM Tower of London   18:00-21:15	of London	Commissioner's role to attend events and functions. Declined due to annual leave
Hospitality tem a G 77	Two tickets (me and a guest) to an evening award gala	Concert hall/arena/ci nema	Corporate Services	01/05/ 2025	600	Patrick Holdaway	National Business Crime Solution	The National Business Crime Solution, a not for profit membership group, offered me two tickets for their gala award evening. The tickets are expensive but include a charitable donation, as they are part of a fund raising event.	The Vox, NEC Birmingha m	Offer declined.  The event is linked to my work and are good networking opportunities but I am at another event that day so already committed.
Hospitality Item	Dinner	Civic building	Chief Officer Team	24/04/ 2025	100	Pete O'Doherty	Honourable Artillery Company	HAC St George's Dinner		Offered as part of Commissioner role to attend such functions, accepted on that basis.

Hospitality Item	Supper	Government premises	Chief Officer Team	23/04/ 2025	75	Pete O'Doherty	HM Commission of Lieutenancy for the City of London	Drill Supper with members of the regiment following HAC visit to be briefed on HAC activities. Declined due to prior commitment.	HAC Armoury House	Offered as part of Commissioner role to attend such events, declined due to prior commitment.
Hospitality Item	Dinner	Livery Hall	Corporate Services	22/04/ 2025	99	Patrick Holdaway	Carlisle Security	I have been offered a place at the Commissioner's Dinner, hosted by the Worshipful Company of Security Professionals. This is a yearly event.	The Army & Navy Club, 36 Pall Mall, SW1Y 5JN	The offer has been made the Chief Exec of Carlisle Security.  The offer was accepted as it is a good networking event and provides an opportunity to listen to the Met's Commissioner.
lospitality Item	Dinner	Restaurant	Chief Officer Team	22/04/ 2025	100	Nik Adams	Sayari	Dinner offer at Hawksmore in the City made by Sayari (a CoLP supplier). Valued at £100 Refused the offer to pay for dinner.	Hawksmor e	Sayari have recently signed a contract with the City of London Police to provide licences for their software. This event was planned to bring together sensior officers from three seperate agencies to promote good use of the tool. Refused hospitality.

	Hospitality Item	Dinner and Drinks with Vendor	Restaurant	National Lead Force Operations	22/04/ 2025	0	Robert Offord	COO Ben Power - Sayari Labs	Invite to have drinks and dinner with the COO (Ben Power) after the procurement of three licences by for Sayari (Financial intelligence software) by CoLP on behalf of ROCUs.	Hawksmoo r, 10 Bassinghall Street, London	Invite to have drinks and dinner with the COO (Ben Power) after the procurement of three licences by for Sayari (Financial intelligence software). This was further engagement and conversations on rollout of software to ROCUs.  However I paid for my own dinner (£19.50) and CoLP reciprocated purchase of drinks (see attached reciepts) therefore no gift or food recieved.
Page /9	lospitality Item	Use of conferencce room	Office premises (external organisation )	Chief Officer Team	11/04/ 2025	100	Pete O'Doherty	Wells Fargo	Use of meeting room at Wells Fargo for a Chief Officers' Away day.	Wells Fargo	Use of room offered as part of staekeholder liaison, accepted for use for ommissioner and the Chief Officer Team.
	Gift Item	GB Women's police football kit	Hotel	Chief Officer Team	08/04/ 2025	100	Paul Betts	GB Police Women's Football Team	Having attended the GB Women's police tournament, Mr Betts was gifted a football kit to wear in the sponsors game that he played in as a thank you for being an ally to the women's team.	Champney Springs, Ashby-de- la-zouch	Mr Betts is a keen supporter and sponsor of the GB Police women's football team as we have at least one player that is on the team and is keen back the team as much as he can to promote health, wellbeing and promote women's sport. To decline would be to offend.

Hospitality Item	Reception	Guildhall/M ansion Hous e	Chief Officer Team	08/04/ 2025	25	Pete O'Doherty	Corporation	This reception will provide an opportunity for the Chief Commoner to thank all those with whom he		Offered as part of Cmsr role to attend Corporation functions, declined due to prior committment.
								has worked throughout his time in office.		
Hospitality Item	Reception	Guildhall/M ansion Hous e	Chief Officer Team	07/04/ 2025	50	Umer Khan	Corporation of London	Invited by Corporation to early evening reception to celebrate Eid al- Fitr.	Guildhall	Invited as Head of Association of CoLP, Muslim Police Association and as COT representative. To decline would be to offend.
Hospitality Soltem CO	Art exhibition	Guildhall/M ansion Hous e	Chief Officer Team	04/04/2025	15	Pete O'Doherty	Corporation	The City of London Corporation requests the pleasure of your company at a private view for the exhibition  Evelyn De Morgan: The Modern Painter in Victorian London		Offered due to Cmsr role/ City event, declined due to prior committment.

Hospitality	Dinner at	Livery Hall	Local	02/04/	100	Joanna Brown	Coopers Livery	The Coopers	Coopers	Attandance is part of our
Item	the Coopers	-	Policing	2025			Company	Livery Company	Livery	regular community
	Livery		_					have invited two	Company	engagament with the livery
	Company							individuals from		companies, and an
								the Mounted		opportunity to explain the
								Branch (Sgt Jo		role of the mounted branch
								Brown and CI		and how we support the
								Steven Alison) to		City of London. This event
								attend one of		forms part of a wider
								their dinners to		discussion around the
								complete a		creation of an MOU with the
								presentation on		livery companies and how
								the Mounted		they can support the
								Branch. The		mounted branch.
								presentation its		
								part of our		
₩								regular		
Ø.								community		
Page 81								engagement with		
Ф								the livery		
$\frac{\omega}{\omega}$								companies and an		
								opportunity to		
								explain what we		
								do and how we		
								support the City		
								of London. This		
								forms part of the		
								creation of a		
								wider MOU		
								between the		
								Mounted Branch		
								and livery		
								companies. After		
								the presentation,		
								dinner will be		
								provided.		

Gift Item	Easter Egg	Guildhall/M	Chief Officer	02/04/	8	Pete	Taiwan MoJ	Easter Egg	Guildhall	Gift offered as part of
		ansion Hous	Team	2025		O'Doherty	Liaison	presented to the	Yard East	meeting, accepted so as not
		е				,		Commissioner by		to cause offence.
								a representative		
								from the Taiwan		
								MoJ Liaison		
								Officer at a		
								business meeting.		
								Accepted as to		
								refuse would		
								cause offence.		
Gift Item	Teabags	Guildhall/M	Corporate	02/04/	8	Louise Tuck	Taiwan MoJ	Speciality teabags	Guildhall	Offered as a thank you for
		ansion Hous	Services	2025				from Taiwan MoJ	Yard East	scheduling numerous
		е						Liaison		meetings. Accepted so as
										not to cause offence.
Hospitality	Lunch	Restaurant	Chief Officer	01/04/	50	Umer Khan	James Thomson,	Lunch with James	Ned's Club	Lunch invitation from Police
မျာtem ထ မ			Team	2025			Deputy Chair of	Thomson, Deputy	Rooftop,	Authority Board deputy
φ							Police Authority	Chair, Police	27 Poulty,	chair, represented as COT.
<del>0</del>							Board	Authority Board	EC2R 8AJ	To decline would be to
										offend.
ф N										

#### Appendix 2 - PUBLIC

#### **Chief Officer Team (COT) Membership of Groups**

#### **Quarter 1**

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

	<u>Date</u>			<u>External</u>	Role/Position
Ref no	logged	Rank	Officer declaring	Organisation	held
		Temp Commander /		Fraud Advisory	Sit on the board of Trustees as CoLP's representative (FAP is a registered
1	18/11/2023	DCS	Oliver Shaw	Panel (FAP)	charity)
		Temp Commander /		Paddington Farm Trust	Sit on the board of Trustees (PFT is a registered
2	18/11/2023	DCS	Oliver Shaw	(PFT).	charity)
				National Cyber Resilience Centre Group and London Cyber Resilience	Non-Exec
6	18/01/2024	Deputy Commissioner	Nik Adams	Centre	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 Service Delivery	Alistair Cook	Church National Cyber	Trustee and Treasurer
15	10/09/2024	Director	Chris Bell	Resilience Centre Group	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
18	27/08/2025	Commander	Tor Garnett	Negative / No Organisations	N/A

### **City of London Corporation Committee Report**

Committee(s):	Dated:
Professionalism and Trust Committee	14/10/2025
Subject:	Public report:
Stop & Search and Use of Force Quarter 1 Update	For Information
This proposal:	Diverse Engaged
<ul> <li>delivers Corporate Plan 2024-29 outcomes</li> </ul>	Communities
provides statutory duties	Providing Excellent Services
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?	No
Report of:	Commissioner P O'Doherty
Report author:	Supt J Wynne

### **Summary**

Q1 has seen an increase in stop and search as the force responds to seasonal criminality with the CoLP area. Bag and cycle thefts are more prevalent at this time of the year and the warmer weather has led to more people enjoying the City environment as a result.

Operations continue in support of Pan London demonstrations as the political situation remains fluid globally. Our officers remain ready to deploy and support, with scrutiny on any uses of police powers accordingly.

The expected report from the University on stop and search was received. The report is still work in progress as some of the figures that were included were not reflective of the City of London and taken from police.uk which does not give the same level of detail as our own data. The university has been made aware and will review the report and re-submit.

#### **Complaints**

Total no Use of Force complaints – 4
Total number of Complaints Stops, and Stop and Search – 2

#### HIMCFRS:

The force was graded as **adequate** in its use of police powers which includes Stop & Search and Use of Force.

There were two areas for improvement:

#### AFI 02 Use of stop and search

The force needs to improve how it records information and reviews data to better understand its use of stop and search.

#### AFI 03 Use of force

The force needs to improve its understanding of why officers use force in some circumstances.

These AFIs will be monitored and delivered via the Operational Improvement Board and as a whole via the Local Policing Committee.

Narrative from the HMICFRS:

There are times when officers apply handcuffs to individuals who are compliant while they are being searched. Placing a member of the public in handcuffs is a use of force and officers must make sure they record the justification for using any force. The recording and justification for use of handcuffs is inconsistent across the force, particularly during stop and search encounters.

This was corroborated by our audit of body-worn video, where we reviewed ten stop and search encounters. We found that in the six encounters where force was used, there was no narrative context of the officer's justification for using force. Generic terms such as 'officer safety' were used to explain why individuals were handcuffed during a stop and search procedure. This doesn't provide sufficient detail about why the officer felt handcuffs were necessary.

It is important to make sure officers use their powers legitimately. They also need to fully record the grounds for using them so the force can make sure any individuals handcuffed have been treated lawfully and fairly.

The question lead has clarified that, any and all uses of forces, whether "compliant" or not needs to be fully recorded and justified with the reasons and necessity for using the force documented.

The "some" circumstances in the AFI was referring to the example around handcuffing.

### **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	340	+ 40 9.07%	企	This is a marginal increase as regional rates had been declining, however, warmer weather and increases in bag and cycle theft have increased operations to deter criminality
Arrest from stop search	104	+ 4 2.75%	仓	Marginal increase in arrests – this is due to the additional training on uses of powers
Searches under s.60	0	0	$\iff$	Question to the panel: should this box ask for Section 60 figures by exception? CoLP has not conducted any section 60 searches within the CoLP area for the last 3 years

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend	Comment (if appropriate)
Juveniles searched	45	+12 38.7%	û	This is a screen shot from the live system detailing juveniles stop/searched — outcome rates and racial disproportionality  Stop and Search Summary between 31/03/2025 and 30/06/2025  31/03/2025 30/06/2025 5  Stop and Searches Carried Out
Black disproportionality	2.4	2.26 in the last quarter		Training ongoing to reinforce our approach to reducing disproportionality in line with our strategic intentions.

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend	Comment (if appropriate)
	61 black self- defined		企	
Asian disproportionality	0.9 46 Asian self- defined	1.32 in the last quarter	Û	
Total items found	220	-4	Ţ	a small drop in items found combined with the increase in searches has led to a drop in the outcome rate of searches. Scrutiny and dip sampling has found no thematic reason for change and negative outcomes of deterrent stop searches are expected. The outcome rate is still very good at 45%.
Strip searches <sup>1</sup> total	2	0 in the last quarter	Ţ.	
Strip search- More thorough	0	0	$\Leftrightarrow$	

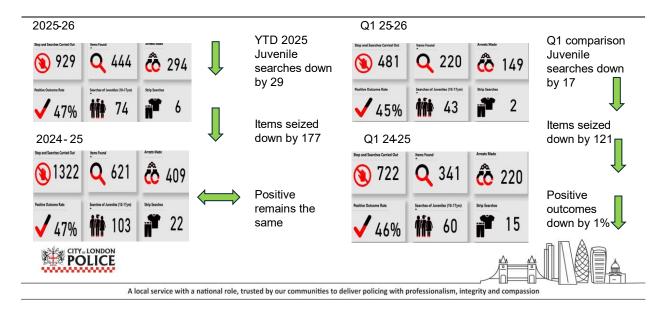
<sup>&</sup>lt;sup>1</sup> See Appendix A for description of types of strip search

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend	Comment (if appropriate)
Juvenile strip searches total	0	0	$\Leftrightarrow$	N/A
Juvenile Strip search-More thorough	0	0	$\Leftrightarrow$	None – see above
Juvenile Strip Search -Intimate parts exposed	0	0	<b>⇔</b>	None – See above
Use of force	966	+126 13.78% increase	⇧	This is due to improved governance with Use of Force form completion. Officers understanding and completion rates have improved from circa 50% to over 80% consistently.
Juvenile use of force	50	+27 117% increase		This figure will have risen inline with the above governance process.

Indicator	Value (number)	Change on previous quarter (number and % if appropriate)	Trend	Comment (if appropriate)
Uses of force arrests	607	+52 9.36% increase	Û	As above
Uses of taser	23	+5 27.77% increase	Û	Increase in Taser use (Drawn or Red dot challenge)
Taser discharges	0	-1 100% decrease		
Live complaints relating to stop/ search	2	-1	1	
Live complaints relating to use of force	4	+1	Û	

Suggestion to the panel, would a redesign of the reporting form assist in the scrutiny and governance of CoLP? Here is an internal screenshot and interpretation example:

Where are we currently and what do our stats say? Stop and Search



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# Agenda Item 11

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

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# Agenda Item 12

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

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# Agenda Item 13

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

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