



Professionalism and Trust Committee (Police)

Date: MONDAY, 2 FEBRUARY 2026
Time: 11.00 am
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members:

Michael Mitchell (Chair)	Deputy Madush Gupta
Deputy Deborah Oliver (Deputy Chair)	David Sales
Joanna Tufuo Abeyie	Naresh Hari Sonpar
Tijs Broeke	Jacqui Webster
Melissa Collett	Peter Buffoni (External Member)
Alderman Professor Emma Edhem	Angela Herbert (External Member)
Jason Groves	

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<https://www.youtube.com/@CityofLondonCorporation/streams>

A recording of the public meeting will be available via the above link following the end of the public meeting for up to one civic year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

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

Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**

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

3. **MINUTES**

To agree the public minutes and summary of the meeting held on 02 December 2025.

For Decision
(Pages 5 - 10)

4. **REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 11 - 16)

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

Report of the Commissioner, City of London Police.

For Information
(Pages 17 - 82)

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

Report of the Commissioner, City of London Police.

Note Appendix 3 is non-public and can be found at Item 15.

For Information
(Pages 83 - 114)

7. **STOP & SEARCH AND USE OF FORCE QUARTER 3 UPDATE AND 2024/2025 ANNUAL COMPARISONS**

Report of the Commissioner, City of London Police.

For Information
(Pages 115 - 124)

8. **ANNUAL CUSTODY UPDATE**

Report of the Commissioner, City of London Police.

For Information

9. **INDEPENDENT CUSTODY VISITING SCHEME ANNUAL REPORT 2024/25**

Report of the Town Clerk.

For Information
(Pages 139 - 154)

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

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

12. **EXCLUSION OF THE PUBLIC**

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

For Decision

13. **NON-PUBLIC MINUTES**

To agree the non-public minutes and non-public summary of the meeting held on 02 December 2025.

For Decision
(Pages 155 - 156)

14. **NON-PUBLIC REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 157 - 158)

15. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q3 NON-PUBLIC APPENDIX 3**

Non-public appendix to be read in conjunction with Item 6.

For Information
(Pages 159 - 168)

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

Report of the Commissioner, City of London Police.

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

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

PROFESSIONALISM AND TRUST COMMITTEE (POLICE)

Tuesday, 2 December 2025

Minutes of the meeting of the Professionalism and Trust Committee (Police) held at Guildhall on Tuesday, 2 December 2025 at 11.00 am

Present

Members:

Michael Mitchell (Chair)
Tijs Broeke
Melissa Collett
Jason Groves
David Sales

Officers:

Sanjay Andersen	- City of London Police
Paul Betts	- City of London Police
Carly Humphreys	- City of London Police
Kate MacLeod	- City of London Police
Jesse Wynne	- City of London Police
Blair Stringman	- Town Clerk's Department
Richard Riley	- Town Clerk's Department
Rachael Waldron	- Town Clerk's Department
Sorrel Cooper	- Town Clerk's Department
Oliver Bolton	- Town Clerk's Department
Charles Smart	- Town Clerk's Department

1. **APOLOGIES**

Apologies for absence were received from Deputy Madush Gupta, Deborah Oliver and Naresh Sonpar.

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

There were no declarations.

3. **MINUTES**

That the public minutes and summary of the meeting held on the 14 October be approved as a correct record.

4. **REFERENCES**

The Committee received a joint report of the Town Clerk and the Commissioner.

RESOLVED, that the report be noted.

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

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

A Member raised concerns about compliance levels for mandatory inclusivity training and asked whether compliance was being monitored across different layers of leadership. An Officer responded that systems were not yet sophisticated but manual reporting was underway. Compliance would be broken down by rank, grade and team, recognising the importance of role-modelling and leadership visibility.

A Member queried what would follow once the high-priority actions were completed, and whether additional actions would be introduced as the strategy evolved. An Officer responded that some actions would need to be carried over and others re-prioritised in line with National developments i.e. Talent Strategy. This would be set out within the paper going to February's committee.

A Member asked how the EDI Strategy was used, who it was available to, and how improvements in data capture and measurement were being progressed. An Officer responded that the Strategy, launched in 2024 and running to 2027, was both an internal and external document overseen by the Commissioner's internal EDI Strategic Board. Work to improve measurement would feed into the updated dashboard.

A Member asked who was included in the term "communities" for the purpose of consultation on the measurement framework. An Officer responded that consultation had included the Independent Advisory Scrutiny Group, the youth advisory group, cadets and partners such as the Business Disability Forum. Plans were in place to widen engagement further next year and to work more closely with the Corporation.

A Member sought clarification on specific action plan items relating to the 'delivery and evaluation of the sponsorship scheme' and the creation of an 'ethics committee with partners'. An Officer responded that the sponsorship scheme had been operating for over a year, initially focused on supporting colleagues from ethnic minority backgrounds who were under-represented in senior ranks. Evaluation of the scheme was planned. The ethics committee was regarded as national best practice and would provide a forum for transparent discussion on complex issues; work was underway to establish it in early 2026.

A Member asked whether achieving a particular level on the Inclusive Employers Maturity Index would demonstrate that the Board had become the most inclusive nationally. An Officer responded that benchmarking was complex; previous assessments had scored the Force at 'silver', with 'gold' being a longer-term (3 to 5 year) aspiration. The Committee was informed that no police force had yet achieved gold.

The Chair sought clarification on the intended future use of cultural audits. An Officer responded that cultural audits had been introduced to identify sub-cultures or behavioural issues not captured through misconduct or grievance

routes. The first full audit had been completed following a trigger referral, and its effectiveness was being evaluated. The intention was to scale capability across the organisation. An update could be provided to the Committee in due course.

RESOLVED, that the report be noted.

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

The Committee received a report of the Commissioner which provided an update of professional standards, conduct, and vetting of the second quarter of 2025.

Officers advised that numbers of complaints and conduct matters had remained stable. Complaints had decreased from Q1 to Q2, with a 13% reduction in cases, which was below the national average.

Officers further advised that the Force remained on a notice period for when HMICFRS might commence its integrity inspection. A readiness assessment had been completed, and this remained a key focus. Work continued with the Service Improvement Team to ensure the best possible position ahead of inspection, supported by a dedicated Inspector within PSD working specifically on the recommendations.

Officers noted that the vetting action plan showed a change from 80% to 65% completion. This did not reflect regression but increased scrutiny and reality-testing in preparation for the HMICFRS inspection.

The Chair queried whether the department had sufficient resourcing to meet inspection requirements. Officers responded that inspection-specific resourcing was appropriate. Wider resourcing considerations remained under review across vetting and PSD functions. Officers were confident in the current resourcing, whilst noting the challenge posed by national inspection outcomes, where few forces had achieved even “adequate”.

A Member welcomed the breakdown of allegation outcomes and queried what the “resolved” category on page 60 represented. Officers responded that this figure reflected allegations that had been closed without requiring a formal complaint investigation. In those cases, checks or immediate action by PSD had resolved the matter. Officers undertook to ensure the glossary reflected this definition clearly.

Officers stressed that, irrespective of the inspection, the ongoing work within PSD continued to improve service standards and support trust and confidence in policing.

RESOLVED, that the report be noted.

7. **STOP & SEARCH AND USE OF FORCE QUARTER 2 UPDATE**

The Committee received a report of the Commissioner which provided an update on stop and search and the use of force in the second quarter of 2025.

Officers reported that overall stop and search activity remained relatively steady. There had been 625 searches in Q2, compared with 675 in 2024, representing a decrease. Arrests arising from stop and search totalled 121 for the quarter across City and Metropolitan areas, compared with 125 in the previous year.

Officers confirmed that work continued to address areas for improvement identified by HMICFRS, particularly around deeper understanding and use of data. Access to improved data now allowed analysis at team and individual officer level to identify potential drivers of disproportionality.

A Member noted that the report excluded stop and search activity by City officers outside the Force area, such as at Notting Hill Carnival, and sought confirmation. Officers responded that this was correct.

The Member asked whether comparative data for activity outside the Force area could be provided, to indicate whether behaviours differed in other policing contexts. Officers responded that the data could be provided, noting that differences would likely reflect the nature of deployment and environment, rather than officer behaviour. For example, at Notting Hill Carnival, a Section 60 authority and the event demographic would naturally lead to higher searches of ethnic minority individuals.

A Member expressed concern that Black disproportionality appeared unchanged and asked when the Committee could expect to see a shift, given access to team and officer-level data. Officers responded that disproportionality remained a priority and that the Force continued to explore detailed analysis and operational practice to support improvement.

A Member referred to previous issues with data not transferring properly between systems and asked for reassurance that those issues had been addressed. Officers responded that significant improvements had been made to data access, quality, and functionality through Power BI. Data quality remained an area requiring constant attention, as poorly entered data inevitably affected outputs, but recent inspection feedback had recognised the progress made.

Another Member asked what constituted a good outcome rate for items found, and how performance compared with the Metropolitan Police. Officers responded that outcome rates in the mid-to-high 30% range were typical, and that tolerance levels and historic trends would be reviewed to provide further context. Officers emphasised that reasonable grounds and clear explanation under the legislation remained the principal focus.

The Chair asked what factors were driving movements in the figures and what further action would be required to reduce disproportionality. The Chair sought an indication of when these changes might be expected. Officers responded that disproportionality remained a key focus and that, while the Force had one of the lowest disproportionality rates nationally, wider societal factors also played a role. Officers highlighted a pilot conducted with two City teams, where enhanced encounter training emphasising communication had

resulted in fewer searches, higher outcome rates, and reduced disproportionality. This approach would now be expanded across local policing teams.

The Chair asked whether the training would be mandatory. Officers responded that direction had been given for all teams to receive enhanced encounter training as part of their training days.

The Chair confirmed that all frontline officers would therefore receive the training in due course and encouraged officers to promote such positive developments. Officers advised that the approach would place the Force in a unique position nationally. Officers expressed confidence in the progress made since the previous HMICFRS inspection, particularly regarding data, and believed the Force was moving in the right direction.

RESOLVED, that the report be noted.

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

9. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
There were no items of urgent business.

10. **EXCLUSION OF THE PUBLIC**
That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

11. **NON-PUBLIC MINUTES**
That the non-public minutes and summary of the meeting held on the 14 October were approved.

12. **NON-PUBLIC REFERENCES**
The Committee received a report of the Commissioner which provided a random sample of police conduct reviews.

13. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q2**
The Committee received a report of the Commissioner which provided information on a number of suspended officers in the second quarter of 2025.

RESOLVED, that the report be noted.

14. **POLICE CONDUCT REVIEWS - RANDOM SAMPLES**
The Committee received of the Commissioner which provided a random sample of police conduct reviews.

RESOLVED, that the report be noted.

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

The Chair remarked that it would be helpful to begin developing a forward-looking risk register capturing areas of emerging concern, providing a simple forward-scan view.

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

The meeting ended at 12.11 pm

Chairman

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PROFESSIONALISM & TRUST COMMITTEE

PUBLIC ACTION TRACKER

REFERENCE	MEETING DATE	ACTION/DECISION	ACTION OWNER	DUE DATE	UPDATE	STATUS
P&T – ITEM 7 – 01	14/10/2025	Stop and Search Report from University on stop and search to be received at the next Committee.	JW	02/02/26	The report has not yet been received. The University has confirmed that they are finishing the report, and the launch will be arranged for Jan/Feb 2026.	<i>In Progress</i>
P&T – ITEM 5 – 01 Page 11	02/12/2025	Clear definitions to be provided in next EDI Update report	KM	02/02/2026	15/01/2026 - These related to 'Inclusive Employers' ratings which they have since moved to 'Gold, Silver and Bronze' standards and are currently reviewing. Full details for year starting April 2026 have been requested and will be included in update at next PTC (as this will be what CoLP are working towards going forwards)	<i>In Progress</i>
P&T – ITEM 5 – 02	02/11/2025	Meeting to take place with relevant stakeholders concerning development of performance framework	SA/PB/RR	02/02/2026	15/01/2026 - This took place on 8 th January with CS and MM in attendance, updates forms part of February report	<i>Completed</i>

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P&T – ITEM 6 – 01	02/11/2025	Check wording in glossary reflects breakdown definitions	CH	02/02/2026	15/01/2026 – Glossary to be included in the next report.	<i>In Progress</i>
P&T – ITEM 7 – 01	02/11/2025	Data in relation to stop and search when officers operate outside of the City to be provided	JW	02/02/2026	15/01/2026 – Update to be provided at the next meeting.	<i>In Progress</i>

Glossary of terms

Allegation: An allegation may concern the conduct of a person or persons serving with the police or the direction and control of a Police force. It is made by someone defined as a complainant under the Police Reform Act 2002 (see 'complainant' below). An allegation may be made by one or more complainants. A complaint case may contain one or many allegations. For example, a person may allege that they were pushed by an officer and that the officer was rude to them. This would be recorded as two separate allegations forming one complaint case. An allegation is recorded against an allegation category.

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

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

- a member of the public was adversely affected by the matter complained about, or is acting on behalf of someone who was adversely affected by the matter complained about
- a member of the public who claims to be the person in relation to whom the conduct took place
 - claims to have been adversely affected by the conduct
 - claims to have witnessed the conduct, or
 - is acting on behalf of someone who satisfies one of the above three criteria
- a member of the public can be said to be a witness to the conduct if, and only if: they have acquired their knowledge of the conduct in a manner which would make them a competent witness capable of giving

admissible evidence of that conduct in criminal proceedings, or

- they possess or have in their control anything that could be used as admissible evidence in such proceedings

- a person acting on behalf of someone who falls within any of the three categories above. This person would be classed as an 'agent' or 'representative' and must have the written permission of the complainant to act on their behalf. A person is 'adversely affected' if they suffer distress or inconvenience, loss or damage, or are put in danger or at risk by the conduct complained of. This might apply, for example, to other people present at the incident, or to the parent of a child or young person, or a friend of the person directly affected. It does not include someone distressed by watching an incident on television.

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

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

- Police officers of any rank
- Police staff, including community support officers and traffic wardens
- Special Constables

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

Complaint recording

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

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

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

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

Schedule 3 Recorded – IOPC Statutory Guidance stipulates where complaints must be recorded and those that must be investigated; these include the more serious matters. Complaints which do not require an investigation will be handled in a *reasonable and proportionate* manner to try to achieve an earlier resolution to the complainant's satisfaction, while others will be investigated formally. At the end of this process if the complainant remains dissatisfied with the outcome of the complaint they have a right of review by either the Local Policing Body or the IOPC, depending on the seriousness of the allegation.

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

Investigations:

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

Investigation outcomes:

Where a complaint has been investigated but the investigation has not been subject to special procedures, or a complaint has been handled otherwise than by investigation, the outcome of the complaint should include a determination of whether:

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

Types of Outcomes:

- **Resolved** – Addressing a complaint to the complainant's satisfaction, in a reasonable and proportionate manner with a meaningful explanation of the actions/decisions taken by the police.
- **Service provided was acceptable** – Service received met or exceeded the expected level of service from CoLP
- **Service Not acceptable** - Service received did not meet expected level of service from CoLP
- **Not resolved/No further action** – Matter could not be resolved in a reasonable and

proportionate manner to the satisfaction of the complainant

- Not determined – It could not be determined if the service received met the expected level of service from CoLP

Reflective Practice Review Process:

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

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

Misconduct: A breach of the Standards of Professional Behaviour

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

Misconduct Meeting: A type of formal misconduct proceeding for cases where there

is a case to answer in respect of misconduct, and where the maximum outcome would be a final written warning.

Sub judice: After recording a complaint, the investigation or other procedure for dealing with the complaint may be suspended because the matter is considered to be sub judice. This is when continuing the investigation / other procedure would prejudice a criminal investigation or criminal Proceedings. There are a number of factors Police forces should consider when deciding whether a suspension is appropriate. The complainant must be notified in writing when the investigation / other procedure into their complaint is suspended and provided with an explanation for the decision. A complainant has the right to ask the IOPC to review that decision.

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

Police Terminology

AA: Appropriate Authority

ANPR: Automatic Number Plate Recognition

ATOC: (Association of Train Operating Companies) agreements.

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

NOT PROTECTIVELY MARKED

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

BWV : Body Worn Video

CAD: Computer Aided Dispatch

CCJ: County Court Judgement

DPS: Directorate Professional Standards
(Metropolitan Police Service)

DSI: Death or Serious Injury

ECD: Economic Crime Directorate

FI: Financial Investigator

HCP: Health Care Professionals

IOPC: Independent Office of Police Conduct

LP: Local Policing

MIT: Major Investigation Team

MPS: Metropolitan Police Service

NFA: No Further Action

Niche: City of London Crime and Intelligence
Database

NLF: National Lead Force

NUT: National Union of Teachers

PCO: Public Carriage Office

PHV: Private Hire Vehicle

PMS: Property Management System

PNC: Police National Computer

POCA: Proceeds of Crime Act

PRI: Practice Requiring Improvement

P&T: Professionalism and Trust

SAR: Subject Access Request

SAR: Suspicious Activity Report

SIO: Senior Investigating Officer

SOP: Standard Operating Procedure

SO: Specialist Operations

STOT: Safer Transport Operations Team

TFG: Tactical Firearms Group

TfL: Transport for London

TPH: Taxi and Private Hire

IC Codes:

IC1 – White – North European

IC2 – Dark European

IC3 – Black

IC4 – (South) Asian

IC5 – Chinese, Japanese, or other South-East
Asian

IC6 – Arabic or North African

IC9 – Unknown

City of London Corporation Committee Report

Committee(s): Professionalism and Trust Committee – For information Police Authority Board – For information	Dated: 02/02/2026
Subject: Equity, Diversity, Inclusivity (EDI) Update	Public report: For Information
This proposal: • delivers Corporate Plan 2024-29 outcomes	People are safe and feel safe
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of:	Commissioner of Police
Report author:	Det Supt Kate MacLeod

Summary

Our focus on measurement and performance continues, workshops have taken place in the interim period between December and February Committees to help us refine our frameworks. This paper describes how this will be applied to a quarterly performance pack; setting out progress against EDI deliverables and trends in relation to our outcomes and objectives.

The last reporting period has seen an increase in ‘completed’ high-priority actions from 14 to 19, with 9 ‘in progress’ which are being carried in to 2026. Key achievements of note include a refresh of our Youth Independent Advisory Group (YIAG) and establishment of an Ethics Panel.

Delivery of our ‘Inclusivity Programme’ continues with 5 events taking place over the reporting period and an average knowledge gain of 28%. Absolute compliance (2 modules per calendar year) has improved across the force from 10% to 24%. In addition, a further 20% of the Force have now also completed one Inclusivity Programme module bringing overall engagement with the programme up to 44% compared with 26% at the end of September 2025. However, we are conscious that we still have much to do before April to improve this picture, we are working with our senior leaders, Chief Officers and Communications team to deliver clear messaging on expectations.

Performance against 2025-26 prioritisation

Our previous update showed 14 of our high priority actions as completed, with our ambition of achieving all 28 actions by the end of the first quarter of Year 2.

For this reporting quarter (covering October – December 2025), a total of 19 actions have been completed, with 9 remaining. Actions completed include ongoing and consistent evaluation of Inclusivity Programme modules (including level 1 & 2 evaluation metrics), with a plan to move towards a higher level of evaluation to show behaviour change and impact.

Actions status 2025	Launch Q1 (Jan - March 2025)	Q2 (April – Jun 2025)	Q3 (Jul - Sep 2025)	Q4 (Oct - Dec 2025)	Q5¹ (Jan - March 2026)
<i>Completed</i>	4	7	14	19	
<i>In progress</i>	20	21	14	9	
<i>Not started</i>	4	0	0	0	

We have also completed our refresh of the Youth Independent Advisory Group (YIAG), carried out in consultation with departments across CoLP, including Public Protection Unit (PPU), MAPT (Multi-Agency Prevention Team) and AOJ (Administration of Justice). The YIAG has sat quarterly since 2024 with members receiving inputs on topics such as TASER, Vetting, Stop & Search and Policing Protests. The inputs and recommendations of the YIAG has been used to inform training for City Police Officers and influence policy.

Our Ethics Panel has also now been created, all members have received ‘ethical dilemmas’ training to prepare them for the role. The Terms of Reference for this group have been signed internally at our EDI Delivery Board and the first meeting was held on 20th January 2026. Following discussions by the panel, the themes and accompanying suggestions will be shared at Organisational Learning Forum and published internally on ‘City Net’. The Ethics Panel has had a full Equality Impact Assessment and received broad consultation. An independent Chair has been recruited, and is currently going through vetting.

Two ‘Medium’ priority actions have also been completed this quarter, including the delivery of ‘Insights’. Insights is a programme designed to help people understand themselves and connect better with others. It provides a valuable framework for self-awareness and learning how others perceive you. Within the work environment, the system allows us to recognise strengths and preferences of behaviour within ourselves and each other.

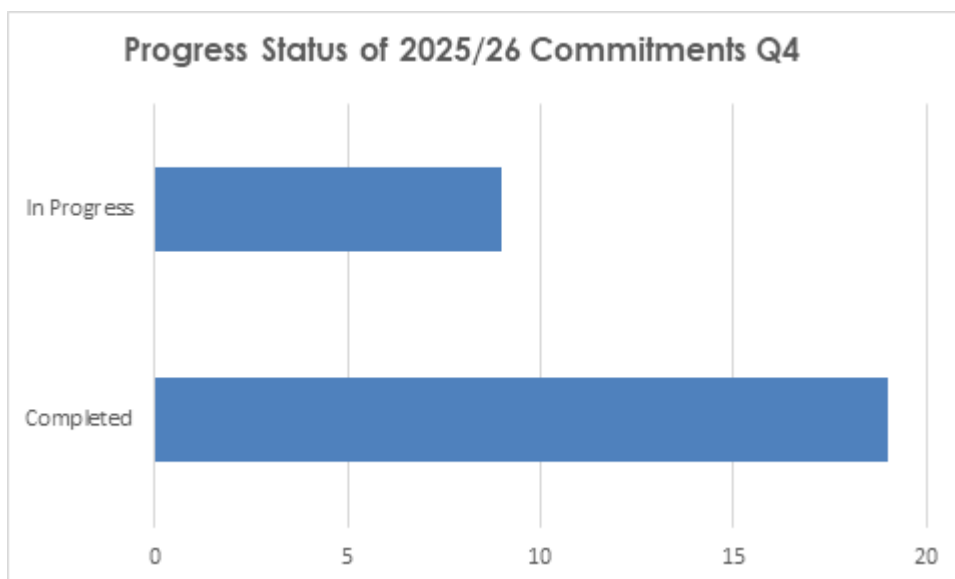
As part of our regular review, some actions have been moved from Low to Medium priority and are now in progress. The re-categorisation of priorities could be due to a number of factors such as launch of new Policing strategies, such as the National Talent Development Strategy. Likewise, supporting activities, such as ‘ensuring diverse groups access to leadership programmes’ are also re-prioritised and

¹ As per previous discussions, moving to financial year to align with forcewide reporting frameworks

progressed. An internal workshop will have taken place in January to review all EDI Strategy actions for 2026 to determine if any further re-prioritisation is required.

A total of 9 high priority actions will see implementation move into year 2. The reason for this is nuanced. While many of these actions are in progress, ascertaining a 'completed' point is difficult. For example, our work on the Police Race Action Plan Maturity Matrix. Similarly, the Violence Against Women and Girls Delivery Plan is in progress but being adapted to consider the Government's new VAWG Strategy so currently unable to show 'completed'.

Although progress has been made on evaluation and engagement, both of these will need to move into Year 2 as they continue to evolve. We are also unable to complete some actions until procurement is completed i.e. Staff Survey provider.



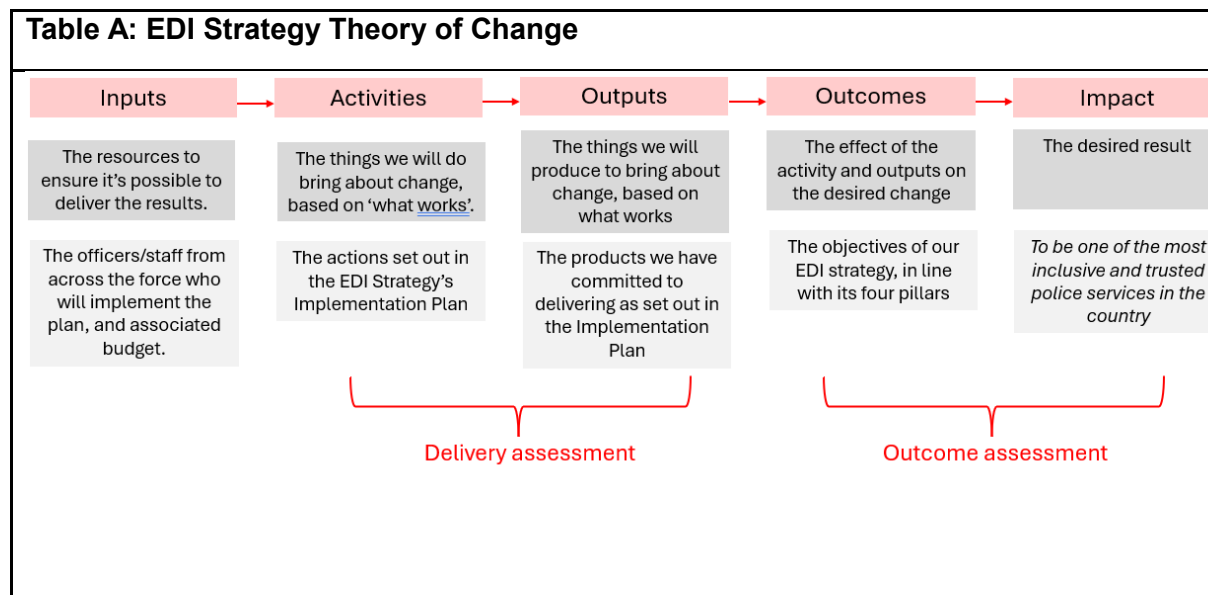
The following progress table shows breakdown of actions by quarter and by pillar.

Progress by Pillar	Launch	Q2	Q3	Q4	Q5
<i>Our People</i>	56% (18 total actions: 3 completed, 14 in progress, 1 not yet started)	67% (18 total actions: 6 completed, 12 in progress)	75% (18 total actions: 9 completed, 9 in progress)	83% (18 actions, 12 completed, 6 ongoing)	
<i>Our Policies</i>	50% (2 total actions: 1 completed, 1 not yet started)	75% (2 total actions: 1 completed, 1 in progress)	100% (2 total actions: 2 completed)	100% (2 actions, all completed)	
<i>Our Public</i>	33% (6 total actions: 0 completed, 4 in progress, 2 not yet started)	50% (6 total actions: 6 in progress)	75% (6 total actions: 3 completed, 3 in progress)	83% (6 actions, 4 completed, 2 in progress)	
<i>Our Partners</i>	50% (2 total actions: 2 in progress)	50% (2 total actions: 2 in progress)	50% (2 total actions: 2 in progress)	75% (2 actions, 1 complete, 1 in progress)	

For reference, a full copy of 'Our People EDI Strategy 2024-27 can found at Appendix A.

Update on Key Developments

We are developing a performance framework to help the force – and Professionalism & Trust Committee (PTC) – assess CoLP’s performance against its ambitions. By providing a consistent picture of performance and increasingly using this data to identify trends and insights, we can continue to refine our delivery approach to improve the likelihood of achieving our desired result. The Theory of Change below (Table A) visualises the connection between the EDI’s strategy’s activities, outputs and intended outcomes.



As well as monitoring progress towards achieving the deliverables set out in the EDI implementation plan (delivery assessment), the performance framework will include a set of outcome measures which we will use to monitor and track progress against a set of strategic objectives (outcomes assessment) and more readily identify organisational risk. These objectives align to the four pillars of our EDI Strategy - *Our People, Our Policies, Our Public, and Our Partners* (Table B) – all of which should contribute to the force’s overall ambition of becoming *one of the most inclusive and trusted police services in the country*.

Table B: EDI Strategy objectives	
Pillar	Strategic objective
<i>Our People</i>	Increase the inclusivity of our leadership and workplace culture
	Increase the representativeness of our workforce
	Improve the ethical and professional standards of our workforce
<i>Our policies</i>	Improve our use of external advice and scrutiny to develop our policies and procedures

	Improve our use of internal advice and scrutiny to help us develop our policies and procedures
	Improve how well our policies and procedures reflect equality impact considerations
<i>Our Public</i>	Increase our engagement with children and young people
	Improve victim satisfaction levels across all protected characteristics
	Enhance our approach to engaging with communities and responding to their needs
	Reduce disproportionality in the use of our powers
<i>Our Partners</i>	Increase the diversity of the suppliers we work with

The framework will be applied to a quarterly performance pack setting out progress against EDI deliverables and trends in relation to the headline outcome measures associated with each strategic objective.

It is important to note that, whilst we have included the full suite of metrics to show the ambition for a coherent framework across all pillars, CoLP cannot currently report on all of them due to data-related challenges (e.g. limitations of local and national systems, access to data, technical and analytical capacity and capability). We will work to address these data gaps so we can continue to strengthen the insights contained with the performance packs.

Inclusivity Programme October- December 2025

Appendix B provides evaluation data for modules delivered during this reporting period. We were able to utilise ‘Black History Month’ as a hook for our programme delivery in October, with 2 events delivered by ICOD with support from our Black Police Association, alongside hosting of the National Black Police Association Conference. These included a session delivered by Michael Fuller QPM, a retired Police Officer and Barrister who became the UK’s first and only Black Chief Constable when he led Kent Police from 2004-2010. The following week, a member of our Police Staff introduced us to her local church to discover more about African culture and its links with Christianity.

We have also delivered sessions on alcoholism (in support of our Health and Well-being Network), White Ribbon Day (in support of our action on Violence Against Women and Girls) and Assisted Technology (in support of our ‘DEN’- Disability Enabling Network). The detail in relation to knowledge gain (averaging at 28%) and impact can be found at Appendix B. Although we celebrate the positive feedback gleaned from these events, we are also conscious that we need to do more to continually improve attendance, completion of feedback and evaluation.

Inclusivity Programme Compliance

We highlighted this as an issue previously, with poor completion rates in some areas of the force. It is clear that if we are to start moving towards a 'Gold Star' position through any accreditation we need to ensure that the EDI training we stipulate as being 'mandatory' is being completed across the force. We have also taken on feedback from PTC members that we need to ensure compliance from our more senior ranks. As such, the action of, '*Ensuring our SLT are attending Inclusivity Programme modules*' has also been moved from low to medium as the importance of role modelling has been recognised as a more higher priority action.

A full report on compliance can be found at Appendix C, to note that the following improvements have been made in Inclusivity Programme compliance in the last 3 months:

- At the end of September 2025, a total of 638 Inclusivity Programme modules were attended/accessed, this almost doubled by the end of December 2025 to 1285.
- At the end of September 2025, 10% of the Force had completed two or more Inclusivity Programme modules, this has increased to 24% at the end of December 2025. In addition, a further 20% of the Force have now also completed one Inclusivity Programme module bringing overall engagement with the programme up to 44% compared with 26% at the end of September 2025.
- All Directorates have seen increased compliance with the programme in the last 3 months, most notably within Specialist Operations, 8% of the directorate had completed the required two mandatory modules at the end of September 2025, this has now increased to 32%.

A plan is underway, with support from our Chief Officer Team, to ensure that clear messaging goes out to all of our supervisors around the importance of attendance. In parallel, our ICOD team continue to conduct focus groups to understand the reasons why a) uptake is poor in some areas, but also b) to understand what is working well in teams when attendance is high.

Appendices

Appendix A: 'Our People' EDI Strategy 2024-2027

Appendix B: Inclusivity Programme Evaluation Pack Oct-Dec 2025

Appendix C: Inclusivity Programme Compliance

Supt Kate MacLeod

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OUR PEOPLE

Equity, Diversity and Inclusion Strategy
2024-2027

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OUR PEOPLE

Equity, Diversity and Inclusion Strategy 2024-2027



“The City of London Police will be one of the most inclusive and trusted police services in the country”

The City of London Police has a unique position, in that we are a local service, keeping those who live and work in the square mile safe, with a national role, to protect the United Kingdom from fraud, economic and cyber crime.

COMMISSIONER'S FOREWORD



“We are passionate about our duty to keep everyone safe. We know equity, diversity and inclusion are essential for us to do that. Ensuring our people – meaning our staff, our public and our partners know how much we value them; and that our policies and processes are equitable and accessible will lead to us delivering the most inclusive police service possible.

Embedding this strategy at the core of all we do will mean that we truly serve to the highest standards of professionalism, compassion and integrity.

T/Commissioner of the City of London Police
Pete O'Doherty





“Equity, diversity and inclusion means I can be trusted to help, no matter who you are.”



OUR ACKNOWLEDGEMENT

There have been widely-publicised policing challenges and failings that have damaged the public's confidence in our police service.

We have been shocked and horrified by the wholly unacceptable incidents that have occurred across policing, nationally and locally, and recognise there has been insufficient progress to meet the size of the challenge and address these failings.

Our police officers and staff embrace the task ahead and remain committed to providing a service driven by integrity and a service that can be trusted to behave appropriately. We are determined to lead by example and deliver policing with legitimacy and trust.

Specifically, we will tackle local challenges head-on, including any disproportionate use of force and stop and search, improving the victim experience and continuing to create a psychologically safe, equitable and inclusive working environment for all who work with us. We will proactively continue to increase the diversity of those working with us at all levels and focus efforts to retain and promote those from underrepresented backgrounds, so that our colleagues reflect the diversity of the communities we serve.



“We value the expertise of our external and independent partners, and will ensure that we work effectively with them to address and confront issues that compromise our service's ability to deliver value-driven policing.”

OUR ALIGNMENT AND COLLABORATION WITH NATIONAL POLICE RESPONSES

The City of London Police is driving behaviours and processes that deliver on the recommendations required of all police forces nationally, with particular focus on those detailed below.

- Baroness Louise Casey's Review, Part 1 of the Lady Angiolini Inquiry, and Operation Hotton have highlighted the need for all forces to improve upon their internal culture, professionalism, handling of complaints and misconduct cases, vetting procedures, support to victims and community relationships.
- The new Code of Ethics focuses on police services 'doing the right things, in the right way, for the right reasons'. This includes the Duty of Candour, requiring policing to openly acknowledge when mistakes have been made and to act in the interests of the public.
- The National Police Chiefs' Council (NPCC) and the College of Policing will implement a new Culture and Inclusion Strategy, to which we will ensure alignment of our own EDI strategic plans.
- We are also committed to delivering our local action under the National Police Race Action Plan, Violence Against Women and Girls National Framework and upholding the Equality Act 2010.



WHAT DO WE WANT OUR STRATEGY FOR EQUITY, DIVERSITY, AND INCLUSION (EDI) TO ACHIEVE FOR OUR POLICE SERVICE?

Specifically, equity, diversity, and inclusion will be significant in our ability to:

- put the victim at the heart of our policing;
- ensure our people have the resources to do their jobs effectively and efficiently;
- enable us to operate with integrity, compassion, and professionalism;
- earn the trust of diverse communities and partners through honesty and legitimacy;
- cultivate a culture of inclusion to ensure our diverse police service can do its best work and attract and retain all talent, to build and maintain strong, engaging relationships with all communities; and
- effectively embrace new technologies, where relevant, to fight crime robustly and engage with our communities.

WHAT IS DIFFERENT IN OUR 2024-2027 STRATEGIC PLAN?

- We will improve transparency, sharing failings, learnings and improvements to be proactive in building trust.
- We will provide yearly objectives and report on their progress.
- We will be collaborative: our people and public will consistently be part of our policing response.
- We will be accountable, measured, and open: our quantitative and qualitative data will tell the story.
- We will responsibly partner with industry-wide organisations to ensure effective and measurable outcomes for our service, public and communities.

WHAT YOU SHOULD KNOW ABOUT OUR QUALITATIVE AND QUANTITATIVE DATA

Over the past three years, we have used metrics to measure the impact our actions have had on our public, policies and processes, partners and people.

However, we recognise that we need to build on and improve how we measure the impact of some of the action and progress we have made. In some instances, we need more time to be able to properly evaluate, others need a meaningful indicator of progress or regression, or to put in place a measuring tool and metric.

While we do have some indicative data, both qualitative and quantitative, that provides insight into the police service we are today, we still need to build on our ability to capture relevant data and baselines and will do this as this strategy evolves.

We have included this in our yearly priorities and will provide updates to our public, partners and people as we implement the commitments in this plan.



“It’s not about ticking boxes or fulfilling quotas.”



WHERE WOULD WE LIKE TO BE IN 2027?

We want our service to be ranked, at a minimum, ‘integrated’ on the Inclusive Employers Maturity Index, which would define the City of London Police as being ‘inclusive leaders and role models in our approach to business, our behaviour and our policies.’

Equally, we want to increase trust and confidence among the public we serve, and will use our victim satisfaction surveys, Independent Advisory and Scrutiny Groups, use of force and stop and search data, and partner feedback to measure our relationship with our public and partners.

Our ambitions will be achieved through our people, partners, public and policies (our four Ps). The detail provided under each ‘P’ will be the focus of our efforts between 2024 and 2027.



THROUGH PRIORITISING OUR PEOPLE WE WILL:

increase diverse representation, improve our standards and ethics, drive inclusive leadership and individual accountability, create an equitable working culture and deliver zero tolerance of any behaviours that compromise this.



THROUGH STRENGTHENING OUR POLICIES AND PROCESSES WE WILL:

ensure our policies and processes are equitable, accessible, inclusive and informed by the diverse representation of our police service and independent scrutiny and key decision-making bodies. Our policies and processes will enable inclusive leadership, accountability and deliver commitment to continuous learning and fairness for our people, public and partners.



BY COLLABORATING WITH OUR PUBLIC WE WILL:

build and sustain authentic engagement and relationships with all communities, to ensure their confidence in our policing and improve our standards in response to crime, by placing victims at the heart of our policing.



THROUGH WORKING WITH OUR PARTNERS WE WILL:

- lead by example by building inclusive relationships with professionals to provide enhanced services for our communities, foster innovative collaboration and establish partnerships that empower our service to deliver our EDI commitments.
- ensure accountability and independent scrutiny of our commitment to become one of the most inclusive police services in the country, we are externally audited by Inclusive Employers. Our 2020 Inclusive Employers benchmark placed us at the ‘compliant’ stage within the Inclusion Maturity Model. This defined our approach to diversity and inclusion, as: ‘we pay lip service to diversity and inclusion, doing the minimum to be legally compliant’. We are disappointed by this scoring and over the last three years we feel we have made significant efforts in progressing into the police service we aspire to be.



“It’s about being able to access everything without needing to ask.”



THE DETAIL:

OUR PEOPLE



Through our **PEOPLE** we will increase representation, improve our standards, drive inclusive leadership and individual accountability, and create an equitable working culture for our diverse police service, through zero tolerance to behaviours that compromise these obligations.

Our people will reflect the diversity of the City of London, will be well resourced to work effectively and efficiently in a healthy working environment, enabling them to work inclusively and collaboratively with colleagues, partners and our public.

WHERE ARE WE TODAY?

We have a police service populated with a diverse range of skilled and talented people. Nationally, we employ the fifth largest percentage of ethnic minority police officers (10 percent) and the third highest percentage of ethnic minority police staff (24 percent). Additionally, 60 percent of our police staff are female. Disappointingly however, we have one of the lowest representations of female police officers nationally (24 percent).

Of our employees, 3.1 percent disclosed that they have a disability and 3.9 percent disclosed that they were LGBTQ+. We recognise our data does not reflect all identities and excludes those protected characteristics within the Equality Act, care leavers, or those from socio-economically diverse backgrounds. Furthermore, it doesn't provide insight into the intersectionality of our police officers and police staff. We want to report accurately on the entirety of our employee population, so we can ensure an equitable and inclusive working culture and service.

This data only includes the detail of those comfortable with sharing their personal information. We must address how we can improve and increase confidence in sharing these details with us.

Our outreach team will continue their focused efforts on increasing interest in our service, through proactive engagement with schools and education centres with high proportions of ethnic minorities, socio-economically diverse people and those of varying religions and faith.

While having a diverse workforce is valuable, we recognise that accessibility and equity - everyone having what they need to be successful and feeling included - is what will drive innovative, effective and efficient policing. To measure this, we ask our staff, through our people survey, to share how true this feels for them. In February 2024, 57 percent of our workforce shared their views and 87 percent of those believed their manager treats them with respect, 86 percent confirmed they felt accepted and respected within their team, and 70 percent agreed that poor behaviour is always addressed quickly. Our latest EDI score was disappointing, with 64 percent of respondents disagreeing with the comment, 'COLP delivers on its commitment to promoting diversity, equity, and inclusion'.

REPRESENTATION

Our approach to inclusive and equitable recruitment processes will continue to ensure we hire the best people from all backgrounds and, where necessary, respond to trends in underrepresentation with equitable hiring processes. Efforts to challenge inequity in



recruitment processes, is already in train, including collaboration with our staff networks, and our leadership accelerator, both of which have seen us attract and engage with an increasing number of ethnic minority and deaf, disabled, and neurodivergent talent. We know this is just the beginning and remain enthusiastic about building careers for talent from all backgrounds. Hiring inclusively is the first step, however, to ensure our people feel psychologically safe, valued, and respected, our workforce will continue to benefit from consistent education through our inclusivity programme and engagement with the varying lived experiences of our partners and people continues.

LEADING BY EXAMPLE AND LEADERSHIP ACCOUNTABILITY

Our active bystander' education has begun to equip our leaders with the knowledge to lead by example, learn from effective practices within other forces, tackle inappropriate behaviour and ensure our police service prioritises the wellbeing of those working with us with professionalism, integrity, and compassion. Programmes such as 'Leading with Impact' for female employees, and the Positive Action Leadership Scheme (PALS) for black, asian and ethnic minority constables, sergeants, and police staff, enable accountability among our senior leaders to ensure they remain proactive in levelling the playing field for underrepresented talent at every level. Additionally, the addition of inclusivity objectives within personal development reviews will ensure our workforce prioritises its commitment to equity and can demonstrate those objectives are being met.

STANDARDS AND ETHICS

It is vital that those who work in policing have trust and confidence in the police as their employer and feel empowered to uphold the high standards the public expect. We have invested in our Professional Standards Department to ensure that we effectively uphold our commitment to 'police with professionalism, integrity, and compassion'. For example, our 'Domestic Abuse Matters' training for all officers has already seen 800 officers successfully trained, including 80 percent of frontline staff. We are now in the top two police services in England and Wales for successful evidence-led prosecutions for domestic abuse.

CULTURE

We have invested in proactive cultural review audits which examine internal conduct and the culture of teams, uncovering elements of hidden culture which impact on how people feel at work, including low level unacceptable behaviours not reaching the threshold for misconduct. While in the pilot stage, these reviews have and will continue to inform how we consider and value intersectionality, ensure access needs are met, tackle microaggression, and to ensure an authentic sense of inclusion. Our wellbeing activities are shaped by our people, enabled and supported by our leaders and assessed against the His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) police effectiveness, efficiency, and legitimacy (PEEL) inspection regime. We continuously spotlight wellbeing, participate in national activities and events and offer a large variety of services to provide mental health and wellbeing support to our staff and officers.

ZERO TOLERANCE

Our zero tolerance for all behaviours that compromise the values of our Policing Plan or the public's trust in our ability to serve them, is expected as business as usual. Our listening circles, which provide our people space to safely share concerns, have been described as 'effective practice' by the College of Policing and have since been implemented by several police services. Our Violence Against Women and Girls (VAWG), and Police Race Action Plans, are both leading our work to be actively anti-racist and strengthen our response to crimes directed at women and girls. This, with our evolving inclusivity programme, will drive our continuous improvement in this area.



OUR CONTINUED COMMITMENT

- We will introduce pledges from police leaders, staff and officers that they will be held accountable for delivering.
- We will increase the diversity of underrepresented talent from all backgrounds within student officer intakes and at all levels across our service.
- We recognise that the demographic of our employees does not reflect the diversity of the UK population and so we will focus efforts to enable, attract, retain and develop people from a broad range of backgrounds, including socio-economically diverse backgrounds, deaf, disabled and neurodivergent people.
- 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.
- We will ensure that all leaders working for us complete mandatory and regular inclusive leadership training. We will regularly review the effectiveness of this education through relevant metrics, including our staff survey.
- We will introduce inclusivity objectives into professional development reviews to drive individual accountability.
- We will leverage the value of our Professional Standards Department to monitor the complaints and feedback we receive on our service and use our new investment in technology to record and address these in a timely manner and with empathy. We are implementing the new National Code of Ethics locally, which has a focus on ethical leadership. This aligns with our ethical dilemmas training which equips our inspectors and supervisors with the confidence and knowledge to have challenging conversations with colleagues around ethical policing.
- We will complete audits every quarter and use the results of these to inform changes in culture, the content of our inclusivity programme and professional standards work.
- We will embed recommendations from all national policing plans and working together with Professional Standards, victim satisfaction, and use of force monitoring teams ensure expected high standards are met.

WHERE DO WE WANT TO BE?

In 2027, we hope to be reflecting the Greater London area and beyond more closely and improving representation levels year-on-year, particularly as the Greater London population is a part of our commuter and leisure communities and our own workforce.

We will continually review our internal data collection to ensure that it accurately reflects changing social interpretations of protected characteristics, such as gender identification and relationships.

We will have seen an increase in people self-declaring protected characteristics at all levels across our service, with all feeling included and valued.

Our staff survey will have seen an improved completion rate, indicating that people see the value in sharing their feedback and this would provide us a more representative picture of how all our people feel working within our service.

We want those who work for our service to feel a sense of pride in working for City of London Police to feel valued and respected as individuals.

HOW WILL WE MEASURE THIS?

- Recruitment and retention figures of all people, with special focus on those from minority backgrounds;
- A decrease in the number of complaints made due to poor ethical standards;
- Promotion of all people, with a specific focus on monitoring the progress of under-represented talent to bridge promotion gaps;
- Year-on-year progress of our people declaring their differences;
- Outcomes and impact of our ethical dilemmas training;
- The number of cases of discrimination, bullying or otherwise, being reported and consequences of this reporting;
- Improved assessment results of our culture, both qualitatively and quantitatively; and
- Our staff engagement score and staff survey will provide insight into the impact of interventions and solutions ascribed because of our cultural audits.





OUR POLICIES



Through our **POLICIES** we will ensure public, internal, and external scrutiny and accountability, a commitment to continuous learning, and enhance equity for our people, public and partners.

We create policies and processes that are informed by lived experiences and the expectations of our people, public and partners, including the diverse representation of our independent scrutiny and decision-making bodies.

INDEPENDENT, PUBLIC, INTERNAL, AND EXTERNAL ACCOUNTABILITY

Our Independent Advisory and Scrutiny Group (IASG), provides feedback and challenge on matters relating to stop and search, use of force, equality and inclusion and professional standards. We recognise the need to ensure these groups are made up of a diverse range of people, who have relevant lived experience or are directly impacted by the issues we are seeking to learn from, tackle or address. The group is also invited to provide appropriate independent input on critical incident gold groups, capturing community concerns. This relationship is successful in influencing our policies and has expanded to form a Youth Independent Advisory Group (YIAG), who were actively involved in our Stephen Lawrence Day Foundation event. Our partnership with Mentivity, who educate and provide insight into young black people's experiences of interacting with the police, has already seen an improved relationship with the black community. We remain committed to evolving the way we police with the support of these independent groups.

CONTINUOUS LEARNING

We engage regularly with staff networks and associations and external communities in reviewing our work, through listening groups and internal and external events, ensuring policies and practices translate into behaviours that ensure we proactively treat all community members and our people, with fairness. Our Professionalism and Trust team, combined with senior diversity champions across our organisation, will continue to cultivate a learning mindset in this area to ensure that policies are inclusive of considerations relevant to all.

ENHANCING EQUITY FOR OUR PEOPLE

We are committed to ensuring that we support investment in the recruitment, retention and progression of all people and, where relevant, focusing efforts on those from a broad diversity of backgrounds, including disabled, black, asian, and minority ethnic officers and staff, to improve the low levels of representation in senior roles. We will support promotion by delivering a variety of programmes developed to provide support for all our employees, with tailored focus on under-represented groups. This initiative will form part of our commitment to develop our future leaders and ensure equitable career progression for all.



OUR CONTINUED COMMITMENT

- We will establish partnership standards to ensure we can receive and review feedback from the public and our partners and share this with internal stakeholders to create new ways of working.
- We will monitor the effectiveness and impact of our IASG and YIAG, through our internal and public reporting metrics.
- We will use our staff networks and associations as key partners in delivering inclusive and relevant policies and review these quarterly to ensure their effectiveness.
- We will track the progression of talent through robust and impartial development platforms and processes.

HOW WILL WE MEASURE THIS?

- Monitoring and scrutinising data through qualitative insights into effectiveness of relationships with key community groups and the impact this has had on policing, including new policies, processes, or codes of behaviour.
- Equitable processes will be measured in respect of their purpose; data will be collected on the value they add and/or the problem they solve.
- Our gender and ethnicity pay gap reporting will provide insights into progress made on equitable pay structures.
- Our staff networks and associations' ability to inform, contribute and shape policies that impact our people.
- Staff survey and staff engagement scores will allow us to measure the effectiveness of equitable hiring activities and policies.
- Exit interviews and the national leavers' framework will provide insights and inspire on-going activity to ensure we retain our skilled and talented people.

WHERE DO WE WANT TO BE?

City of London Police policies are intrinsic to tackling systemic challenges that compromise our ability to be an inclusive, accessible and equitable police service.

We will be a police service which has inclusion and equity, organically, at the forefront of policy design, creation and implementation. Policy-makers will lead with empathy, emotional intelligence and understanding of the impact such policies have on those working within our service and those we serve.

Additionally, any updates to policies will incorporate equity, accessibility and inclusion in real time for those working within the police service.

Our measuring mechanisms will inform progress on this goal across the three-year cycle.



OUR PUBLIC



By collaborating with our **PUBLIC**, we will build and sustain authentic engagement, increase standards in our response to crime and place victims at the heart of our policing.

We will proactively and enthusiastically engage with the public and communities by actively listening to their experiences. We will partner with key community stakeholders and those living and working within the City of London, to solve and tackle crime, create new ways of working together and opportunities to build on the positive work of the City of London Police.

WHERE ARE WE TODAY?

Our current victim satisfaction surveying process looks at responses from victims of crime who have answered questions relating to their treatment, how well they were kept informed, and their satisfaction with the overall service. The response rate for July-December 2023 survey was just three percent, with 51 responses from a possible 1031.

The data told us:

- how they were treated had the highest victim satisfaction levels and showed the largest increase at 27 percent;
- ‘kept informed’ levels experienced a 16 percent increase in satisfaction;
- satisfaction with the overall service had a 12 percent increase;
- satisfaction with the service provided by the contact centre voice channel remains above the 95 percent target and stable over the long-term;
- satisfaction rates concerning the online reporting tool have seen slight increases over the last three quarters, although in the main they remain under the 85 percent target;
- positive anecdotal feedback included: ‘we were treated very well’, ‘supportive’, ‘professional’, ‘respectful’; and
- negative anecdotal feedback included: ‘ignored’, ‘long delays between updates and progress’ and ‘disappointment’ with case investigations and outcomes.

Disproportionate use of stop and search and force has remained consistent in the previous two years, although figures within City of London Police are observably better than the national average.

EDUCATION

Our Inclusivity Programme will continue to upskill our officers on experiences from a broad range of backgrounds. Police officers and staff must feel confident communicating, understanding, and appreciating the intersectionality of all members of the public and their colleagues to ensure we effectively and efficiently tackle crime. Our Custody ADHD screening has increased awareness and education of neurodiversity, adjustments, and assessment. We will continue to extend this education to ensure inclusive policing for non-neuro-typical people. As well, our sign video app has ensured that our service is accessible to deaf British Sign Language users, offering communication via video calls. We recognise this is just the beginning and are committed to being a fully accessible service to all who rely on us and will continue to build on these efforts.



Since 2016, City of London Police has partnered with the Prince's Trust, supporting the Mosaic primary and secondary school mentoring programmes. Mosaic's secondary school mentoring programme creates opportunities for young people growing up in our most deprived communities. We have also supported our people to complete a 12 week placement on the team programme, where officers and police staff undertake a short attachment to co-deliver the team's programme, with a delivery partner organisation, for example, higher education providers and the YMCA.

Our police cadets programme promotes a sense of citizenship and life skills amongst our cadets; this is achieved by having a structured policing development program which the cadets attend each week. Cadets compete in competitions such as first aid and policing skills, undertake Duke of Edinburgh training at all three levels and take part in policing operations which are suitable for their age, amongst other initiatives.

HIGH STANDARDS IN RESPONSE TO CRIME

We will remain visible and accessible to all, especially those communities who have lost faith and trust in policing. Our commitment to delivering recommendations across national plans will help to renew community relationships including, but not limited to, the National Police Race Action Plan, national hate crime guidance and the VAWG action plan. The Police Authority's Independent Custody Visitor Scheme will hold our officers and staff accountable for ensuring inclusive and equitable experiences for all individuals while in custody.

INFLUENCE

Our public will continue to have the agency to influence the depth and breadth of our work. We will respond promptly and professionally to their contributions through consistent consultation with a diverse range of voices, to ensure that our public are active contributors to the success of our policing. Our publication of forthcoming misconduct hearings on our public website will hold us accountable to our commitment to our policing values and build trust with disengaged community members.

TACKLING DISPROPORTIONALITY

Our use of force and stop and search figures relating to disproportionality, while less than the national average, still need to be reduced. By improving our measuring and data set collation, we will become more effective at interpreting and analysing effectively what the data reveals. Improving this process can address any issues raised through targeted training and increased understanding of the impact on adversely affected communities and seek continual improvement through peer and academic review.

OUR CONTINUED COMMITMENT

- We will continue to engage positively with young people throughout London, while also offering our unique skills and training opportunities to all police cadets across the UK, so that our young people meet and take part in peer-to-peer teaching and learning with diverse range of cadets.
- We will implement regular victim satisfaction surveys to assess and measure the effectiveness and professionalism of our services delivered.
- We will ensure the national plans that promote trust and confidence are embedded into our policing activities and provide metrics to measure the success of these.
- We will continue to engage in accessible ways with all our communities.



- We will review our complaints processes to ensure they are robust and offer a prompt way for us to efficiently respond to the views and needs of our people, public and partners.

HOW WILL WE MEASURE THIS?

- publishing and monitoring data on disproportionality and use of police powers, especially stop and search and use of force;
- auditing consultations, the number of consultations taken place with our communities, their visibility and reach and tracking our response;
- narrative and quantitative reporting on our promises, commitments, and the success of our plans; and
- monitoring the levels of reporting of hate crime and demonstrating how we have responded.

WHERE DO WE WANT TO BE?

Our victims will be at the heart of all we do and this will be evident in our data. Our investment in a new survey system that improves our ability to tackle individuals' dissatisfaction in real time, while increasing the ability for managers to hold their teams accountable, will show our victims they are a priority for all who work for us.

We are a police service that has seen a significant reduction in disproportionate use of stop and search and use of force, thus increasing confidence within our communities that our service is a fair and impartial one. Additionally, we will have established an effective way to tackle this disproportionality head on. Our metrics provide a richer picture of this data, so that we can continue to identify why disproportionality exists and provide valuable insight to reduce it.

Our Professional Standards Department will have cemented our robust approach to providing a professional service, led with integrity, delivered compassionately and supported by effective reporting mechanisms which will allow for those internally and externally to raise concerns. Additionally, the department will be holding our service accountable via an established, dedicated review panel for all decisions that involve a discriminatory allegation, including for vetting appeals. Furthermore, we will remain responsible for delivering the Police Race Action Plan, particularly around disproportionate use of police powers, and our commitment to supporting black victims of crime, embedding organisational learning and high standards.

The community we serve will be working in partnership with us and our existing Independent and Advisory Scrutiny Group to help us understand the impact of adverse interactions with the police, to ensure that we continue to be a service that understands the intersectional and cultural nuances of our communities.

OUR PARTNERS



By working with our **PARTNERS**: leading by example, we will continue to build inclusive relationships which provide enhanced services for our communities, foster innovative collaboration and establish recognition for our partners that exemplify our values.

We will achieve this by adopting a learning mindset in which both partners and the police learn from one another to increase trust and build mutually strong relationships. In turn, we will generate an inclusive and representative supply chain.

WHERE ARE WE TODAY?

Today we have positive relationships with our partners, and value the honest dialogue and knowledge sharing we have in place, including the scrutiny and feedback we receive and the value this provides.



“Working with the City of London Police has been refreshing, to say the least. Having delivered police training for the last four years with another police force, I’ve noticed a stark difference between the two forces in terms of environment and inclusivity during my sessions. Although I haven’t been embedded within the service, the inclusivity in the sessions I’ve run for student officers has been evident.

Those who participated in the inclusivity program sessions were very progressive, asked lots of questions, and showed a strong willingness to learn. The environment within the City of London Police is positive from my perspective, and there’s a genuine desire among senior leadership and others to understand and address issues, many of which stem from other forces. While the City of London Police can still improve, their unique demographic challenges mean their approach to policing is necessarily different. The communication and willingness to learn have been outstanding. Remarkably, the sessions have not been mandatory, yet attendance has been high. This demonstrates a commitment to understanding different perspectives, such as those related to colonialism, imperialism, racism, and their ongoing impacts on communities. Understanding oppression and implementing anti-discriminatory practices are crucial for finding progressive, collaborative solutions to problems often not created by those trying to solve them.

I believe we can improve further by enhancing the sessions and exploring these issues in greater depth. This would help us improve job performance and support those who want to understand more and incorporate inclusive practices into their daily work. There is significant scope to investigate how we can do this more effectively and collaboratively, building on what we’ve achieved over the past three years.

We are at a critical juncture in policing, with various action plans and reviews like the Race Action Plan and the Casey Review. It’s important to review the training objectives and delve deeper into



these topics to create a greater understanding for interested officers and, more broadly, for those needing to explore these concepts from their perspective. There is an opportunity for growth in implementing the recommendations from these reviews into our day-to-day work. Although it's challenging to address these issues from an institutional rather than a community or social perspective, this partnership can be ground-breaking. It can demonstrate that this collaborative model is the way forward for many police forces across the UK."

Mentivity



"Interacting with the City of London Police team is always an easy and pleasant experience, not only because they are determined and professional; they are also genuinely committed to including and supporting diverse talent."

The College of Policing



"Very positive and encouraging. The inclusion team have phenomenal leadership skills – open, human, keen to learn and improve. It is obvious they are passionate and have a gift for the work they are doing. They have shared, freely, resources covering the work they are doing and have an approach which understands that this cannot be a tick box, that it takes a systems approach looking at all aspects of the organisational eco-system. They are thoughtful and careful in their decision making – even on the most complex and challenging topics."

Inclusive Employers

INNOVATIVE COLLABORATION

We will work to improve the services designed for under-served groups through creative partnerships such as Operation Reframe, which includes our teams working with licensed premises, security staff and promoting 'Ask for Angela', in addition to our Ride Along Scheme that we plan to enhance through partnerships with communities. Both activities provide the public with insight into our policing and the chance to speak to officers on a one-to-one basis. These are some of the ways for us to build relationships with and learn from all of our communities and provide them with greater knowledge of our policing values.

ACCOUNTABILITY

Our partners will contribute to our solutions and responses in addressing equity, diversity, inclusion and accessibility challenges within our people, teams, and with our public. Our commissioner's apology letter to the LGBTQ+ community recognised historical discriminatory application of legislation in place at that time towards that community. The 'Be Lads' safety campaign provided practical advice to men on how to assist women in feeling safe when they are walking alone. These are just two examples of how we proactively and practically continue to hold ourselves accountable, working with suppliers who can assist us in our aim to be one of the most inclusive police service.



INCLUSIVE PROCUREMENT

We will ensure that our procurement process is equitable for existing and new suppliers, to ensure a fair process for those seeking to work with the City of London Police. We will continue to deliver our commitment for diverse independent companies across our supply chain. Supporting diversity in external companies and suppliers, is a key priority for City of London Police.

COMMUNITY-BASED ENGAGEMENT AND RECOGNITION

We have already made progress on establishing partnerships with organisations that can further educate us on cultural differences among our public and commit to building on this. Our educational discussion 'Focus On', which informed officers of the history and experiences of Gypsy Roma Travellers, was impactful in driving cultural understanding and respect for this community's lived experience and saw over 140 officers' attend. Moreover, our Network of Women, which introduced young women to careers within the service, has also allowed us to expand our talent pools. We plan to continue creating new partnerships and build on existing partnerships like these to maximise our ability to keep people safe.

OUR CONTINUED COMMITMENT

- We will ensure we can measure the impact of this work, review its progress, and build on outcomes.
- We will work in partnership with the Corporation Procurement Department to proactively identify and introduce partners from a diverse range of backgrounds to our supply chain.
- We will facilitate opportunities to proactively bring diverse suppliers on board, through engagement exercises, including our responsible procurement toolkit.
- We will build on these efforts and create additional plans in the areas where we still require growth and improvement, within the diversity of our hiring and partnering.

WHERE DO WE WANT TO BE?

We would like our partners to feel respected, valued and enthusiastic about working with us, to ensure that partnerships enhance the services we deliver for our victims, communities, and the public. We will achieve this by our partners actively seeking working relationships with us, because they see City of London Police as the service of choice.

Our partnerships extending beyond the relationships we currently have, to include other services, not limited to, but also capturing other police and emergency services, academia, social services, other sectors and relevant, associated networks. This will help us to shape and improve the service we deliver to the public.

HOW WILL WE MEASURE THIS?

- establish effective practice by learning from partners who have been successful at working with a diverse range of partner groups and suppliers;
- monitor procurement bids from those non-traditional suppliers;
- the number and quality of partnerships formed across all areas of our service delivery, demonstrating how we have formed partnership activities, both qualitatively and quantitatively; and
- surveys with partners, capturing their view on success and learnings.



HOW CAN YOU TRUST US TO DELIVER ON THESE PLANS, AND HOW CAN YOU HOLD US TO ACCOUNT?

Performance against this plan will be reported in our quarterly EDI progress report and assessed through internal and external scrutiny and governance, including the EDI Strategic Board, Professional Standards and Integrity Committee and Police Authority Board.

- **Measurement:** we will update our public and people every quarter on the progress we have made against this plan, including through relevant and transparent data.
- **Impartiality:** we will work with external, independent stakeholders to ensure that we are being independently reviewed on our progress.
- **Transparency:** this strategy will include public and people consultation. We will have pre-planned, quarterly meetings with our public and community-based partners to discuss live issues, hear their voices on matters affecting them and to build relationships with all those communities that live and work within the square mile.
- **Accountability:** we will report our progress through internal and external governance chains to ensure we are accountable on progress against each of the Ps and to reassure our people on our commitment and progress.
- **Consultation:** our public and people remain central to the success of our plan and we will create regular opportunities for engagement with both, to ensure we fulfil the commitment of ‘nothing about us without us.’
- **Understanding our impact:** using our Insights Team, we will monitor the impact of our efforts on our people, partners, public and policies. We will grow the number of teams involved in monitoring, to ensure our collective effort is evidenced and measured for impact and effectiveness. We will expand our monitoring, where relevant, to track representation of disabled people, women, and ethnic minorities.

OUR PERFORMANCE FRAMEWORK REVIEW

- We have set annual objectives for each of each ‘P’ outlined above.
- We will have quarterly progress reviews, including sharing public update to redress areas of focus (to ensure agility to achieving annual goals).
- We will report our progress to independent scrutiny groups, and the Police Authority Board, to ensure we are accountable on progress.
- Our Equity, Diversity and Inclusion Strategic Board will regularly review and monitor the progress we have made with this strategy.



Appendix B

Inclusivity Programme Oct – Dec

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Evaluation Insights



Summary of Q3 Inclusivity Programme Events

Event Name	Event Date	Outline
Black History Month – Michael Fuller QPM	22 nd October 2025	Michael Fuller QPM delivered a hugely impactful presentation detailing the racism he encountered early in his police service which galvanised him to reach new heights in his career.
Beauty in Diversity	29 th October 2025	A chance to celebrate Black History Month with Elizabeth Monney's friends and children from her local church to discover more about African culture. Elizabeth is a member of CoLP Police Staff.
Alcohol Awareness	12 th November 2025	This session delivered by Alcoholics Anonymous offered advice around problem drinking, coping strategies and advice on resources to help friends, family and colleagues dealing with issues. It included ex-Police Officers talking about their experiences.
White Ribbon Day 2025	27 th November 2025	White Ribbon Day raises awareness around the prevention of gender-based violence. For this year's theme – 'We Speak Up For Change' - CoLP's Network of Women arranged a guest speaker from the Probation Service to discuss behaviour change programmes within the Service.
Focus On...Assistive Technology	3 rd December 2025	Microsoft delivered a session with Q&As updating the audience on some of the technology available to assist with day-to-day IT tasks, especially those with neurodiversity.

Focus On...Black History Month – Michael Fuller QPM Level 1 & 2 Impact



Learning Impact

71%
Felt they fully understood the racism faced by black officers and staff early in their careers

78%
Said they had a better understanding of the history of being a black officer

50%
Felt they had increased awareness of growing up in the care system

Attendance Figures

Total Attendees
62
41 Police Staff
21 Police Officers

26 Corporate Services
7 Local Policing
13 National Lead Force
6 Specialist Operations



Satisfaction Rating

4.5/5.0
Excellent



Knowledge Gain

Knowledge Level Before:
3.5/5

Knowledge Level After:
4.2/5

Knowledge Gain
+19%



EDI Strategy Considerations

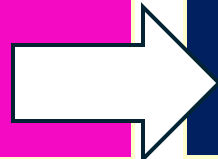
1. Communication needed on how to access support via welfare networks.
2. Ensure staff are aware of the work undertaken by the BPA.
3. Supply a mechanism for people to get further advice.

Next Steps

Identify other potential black speakers for next year's event.

Session Details

Date: 22nd October 2025
Time: 12.00 - 14.00
Speaker: Michael Fuller QPM
EDI Strategy Pillar: PEOPLE



Additional Comments

Excellent, thank you.
More events like this
please.

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

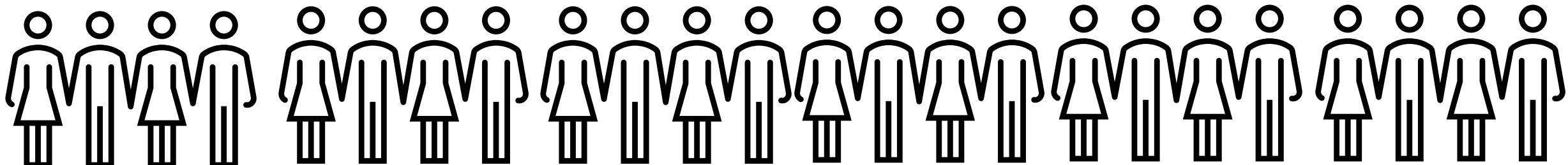
Really enjoyed it and am now
reading the book which is
superbly authored.

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It is a positive sign of our
organisation's progress that
we can bring in such
qualified speakers.

Powerful insight on rising
through the ranks during
times of racism,
discrimination and
prejudice.

Great session and I look forward to
many more to come.



Focus On...Beauty In Diversity – Level 1 & 2 Impact

Learning Engagement

100%
Gained a better understanding of Beauty in Diversity, culture, celebration and food

100%
Understood how different cultures worship and pray

100%
Improved their understanding of how youth interact with the family and church

Session Details

Date: 29th Oct 2025
Time: 12:00 – 14:00
Speaker: Elizabeth Monney
EDI Strategy Pillar: PEOPLE

Attendance Figures

Number of Attendees
24

9 Police Staff
15 Police Officers

8 Corporate Services
10 Local Policing
3 National Lead Force
3 Specialist Operations



EDI Strategy Considerations

1. Promoting awareness of different cultures in an innovative format
2. Empowering internal staff members to broaden their reach and influence

Satisfaction Rating

4.9/5.0
Excellent




Knowledge Gain

Knowledge Level Before:
3.1/5

Knowledge Level After:
4.3/5

Knowledge Gain
+37%



Next Steps

Identify other opportunities for policing staff to demonstrate further examples to show their understanding different cultures.



Additional Comments

The importance of the Church in the Afro / Caribbean culture.

Was really interesting and informative. So encouraging for the community to engage with the police and build relationships.

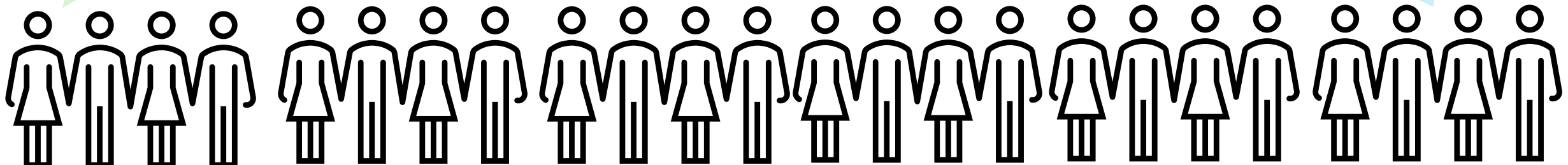
Learning about other countries and communities that live in the UK.

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Inspiring, engaging, fun, positive and left you in good spirits.

Being educated by the children. Their faith being the foundation of everything they do.

I think things like this should be held more often, not just in Black History Month! It was so nice to join.



Focus On...Alcohol Awareness – Level 1 & 2 Impact

Learning Engagement

88%
Understood the negative impact alcohol can have on an individual

87%
Recognised the impact on friends and family of those with misuse issues

88%
Are more aware of the help and resources available

Attendance Figures

Total Attendees
42
22 Police Staff
20 Police Officers

7 Corporate Services
20 Local Policing
4 National Lead Force
11 Specialist Operations



Satisfaction Rating


4.6/5.0
Excellent



Knowledge Gain

Knowledge Level Before:
3.0/5
Knowledge Level After:
4.3/5

Knowledge Gain
+42%

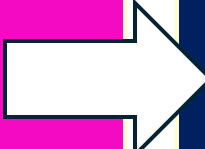


EDI Strategy Considerations

1. Continue to ensure wellbeing support is in place for staff
2. Ensure staff have an internal resource for more information
3. Identify an internal 'ambassador' for confidential advice about family members

Next Steps

Ask Health and Wellbeing Network for resources to include on CityNet



Session Details

Date: 12 Nov 2025
Time: 10.00 – 11.30
Speaker: Alcoholics Anonymous
EDI Strategy Pillar: PEOPLE

Additional Comments

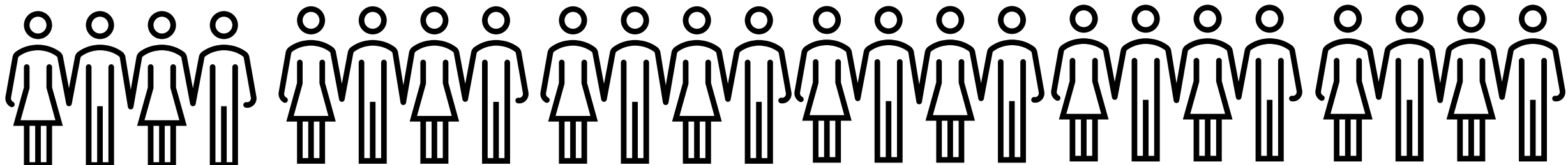
It was very helpful to hear about the way that people's lives had been affected by alcohol and understanding what a complex illness it is both mentally and physically.

In a selfish way this helped me a great deal, with three alcoholics in my family, I realised that it's not a problem to be ashamed of, so seek the help available.

I thought the speakers were incredibly brave to share their stories. I would have liked to have heard from people with less extreme experiences / grey area drinkers that would like resonate with many.

Brave speakers.

I thought the fact that the speakers were ex police officers was powerful. It was a great session. I really enjoyed it.



Focus On...White Ribbon Day 2025 – Level 1 & 2 Impact



Learning Impact

93%
Felt they had increased their education of the subject matter

93%
Said they increased their awareness of gender-based violence

85%
Felt they had opportunities to discuss and explore challenges related to gender-based violence

Attendance Figures

Total Attendees
57
44 Police Staff
13 Police Officers

22 Corporate Services
25 National Lead Force
10 Specialist Operations



Satisfaction Rating

4.3/5.0
Very Helpful



Knowledge Gain

Knowledge Level Before:
3.3/5

Knowledge Level After:
4.0/5

Knowledge Gain
+21%

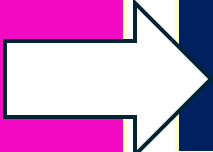


EDI Strategy Considerations

- 1. Communication needed on how to access support via welfare networks.
- 2. Ensure staff are aware of the work undertaken by the Network of Women
- 3. Supply a mechanism for people to get further advice

Next Steps

Identify how this links with our VAWG strategy.



Session Details

Date: 27th November 2025
Time: 12.00 - 14.00
Speaker: Fliss Holmes
EDI Strategy Pillar: PEOPLE

Additional Comments

I was really impressed by the overall engagement by all present. It was good to talk through some of the issues raised.

The speaker was incredible and I'm glad I attended.

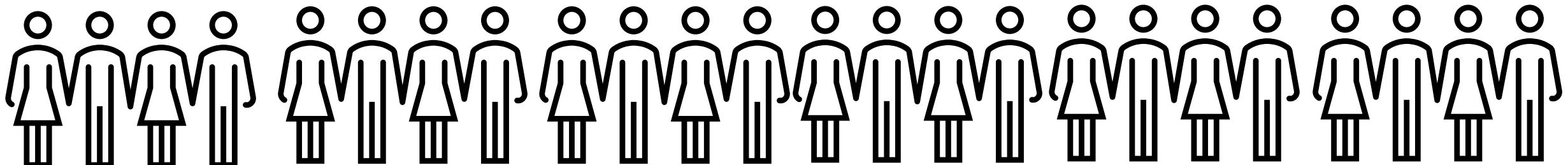
An interesting subject matter that was very well delivered. The interactive voting on the statements section was good too.

Page 58

I learned the beliefs people have can be changed.

Liked the poll vote, it was thought provoking.

Excellent insight into controlling behaviour.



Focus On...Assistive Technology – Level 1 & 2 Impact

Learning Engagement

75%
Gained some understanding of the assistive technology available

75%
Understood the options available

50%
Felt more confident in using the features

Attendance Figures

Number of Attendees
71

45 Police Staff
26 Police Officers

31 Corporate Services
3 Local Policing
18 National Lead Force
19 Specialist Operations



Satisfaction Rating

4.0/5.0
Very Helpful




Knowledge Gain

Knowledge Level Before:
2.8/5

Knowledge Level After:
3.3/5

Knowledge Gain
+18%

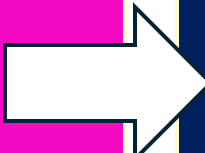


EDI Strategy Considerations

1. More detailed resource internally to promote the tech.
2. Have a tech specialist in DEN to assist with any questions.

Next Steps

DEN to conduct a survey to explore staff requirements



Session Details

Date: 3rd Dec 2025
Time: 10:00 – 11:00
Speaker: Ahmed Mahamuud

EDI Strategy Pillar: PEOPLE

Additional Comments

It was useful to learn how to use Co-Pilot better.

Good for us to have a re-launch date for Co-Pilot.

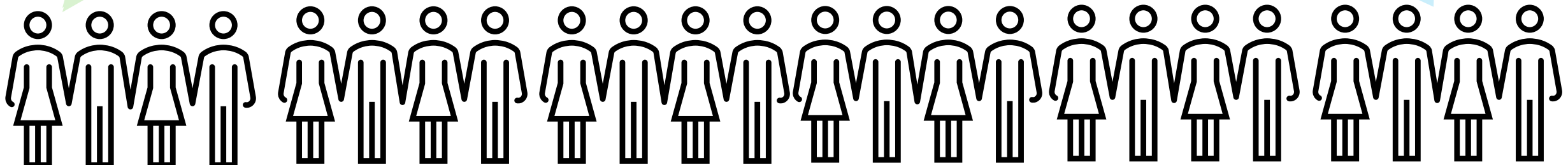
It would be useful to see a list of all the features discussed as a reminder. There was a dictation feature that I thought would be very useful to try.

Page 60

Read aloud function before sending an email is so helpful.

It would be good to have a reminder email or link to a page with the options for our tech available.

Could we have member of the Microsoft 365 Team complete a webinar? They have provided excellent Excel recorded webinars in the past to COLP.



Inclusivity Programme 2025/2026

Quarter 3 Compliance Report

Sasha McAulay

Organisational Development Practitioner

January 2026



Contents

1. Introduction

- About the Inclusivity Programme
- Compliance Target
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- Scope of Compliance Analysis
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- Overview
- Directorate
- Gender
- Ethnicity
- Employee Type
- Rank & Grade
- Team Compliance Levels

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- Insights
- Recommendations

1. Introduction

About the Inclusivity Programme

The Inclusivity Programme launched in 2022 with the following ambitions:

- Help us understand people's different journeys and backgrounds to create an inclusive working environment.
- Facilitate positive intergroup interaction across different diversity types to reduce prejudice and discrimination
- Showcase the value in diversity of thought and bringing people with different backgrounds into policing.
- Embed the code of ethics and our values within everyone's day to day thinking and work.
- Address contemporary issues of Trust and Confidence in Policing, including examples that are specific to CoLP.
- Re-connect the force with its core policing values (Peelian principles).

Compliance Target

A target that all officers and staff complete a minimum of two Inclusivity Programme modules in the 2025/2026 PDR year was set at the start of 2025.

The following compliance data is based on attendance records from in-person modules and online modules including when online recordings of sessions have been viewed and the Inclusion, Culture and Organisational Development Team notified of this. Any compliance related information stored in PDR objectives will be included in the end of year compliance report.

Overview of Modules

From 1st April 2025 to 31st December 2025, the following Inclusivity Programme modules have been run:

- **4** sessions of Ability Smart Disability Awareness
- **4** sessions of Ethical Dilemmas training
- **9** Focus On...sessions covering topics such as ADHD, assistive technology, Deaf awareness, Black History Month, Bipolar, Alcoholism, Schizophrenia and Andropause
- **8** sessions of Understanding Ideologies
- **2** sessions of Mental Health Awareness
- **5** sessions of Mental Health First Aid
- National Black Police Association Conference
- White Ribbon Day 2025
- Worldviews in the Workplace
- Recordings of previously run Focus On... sessions have been made accessible on CityNet

In total modules have been attended/viewed by **1,285** individuals.

Scope of Compliance Analysis

These compliance figures do not include staff/officers on long term sick leave, maternity leave, and career breaks. Specials, contractors, volunteers and agency workers have also not been included.

While not included in these compliance figures, these staff/officers/contractors were still able to access the Inclusivity Programme modules.

Purpose of the Compliance Analysis

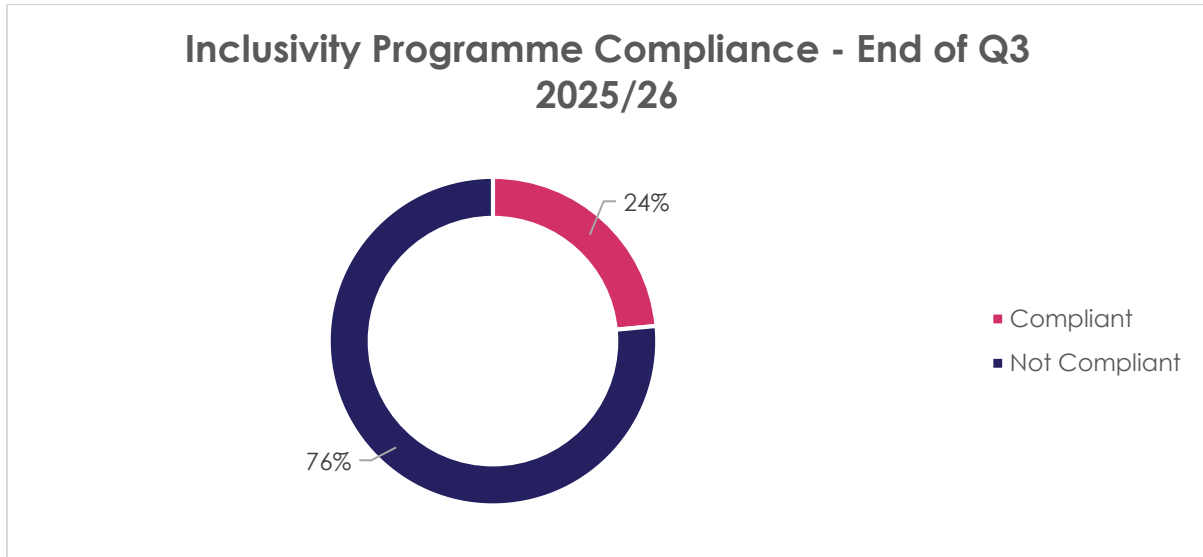
The following compliance analysis has been generated to allow for insightful understanding of engagement with the Inclusivity Programme and to inform intelligent continued delivery of the programme in the coming months and years.

This report covers attendance up to and including the end of Q3 (31/12/2025) and is intended to provide a snapshot of compliance to ensure teams are on track to ensure full compliance by the end of Q4 (31/03/2026).

2. Compliance Analysis

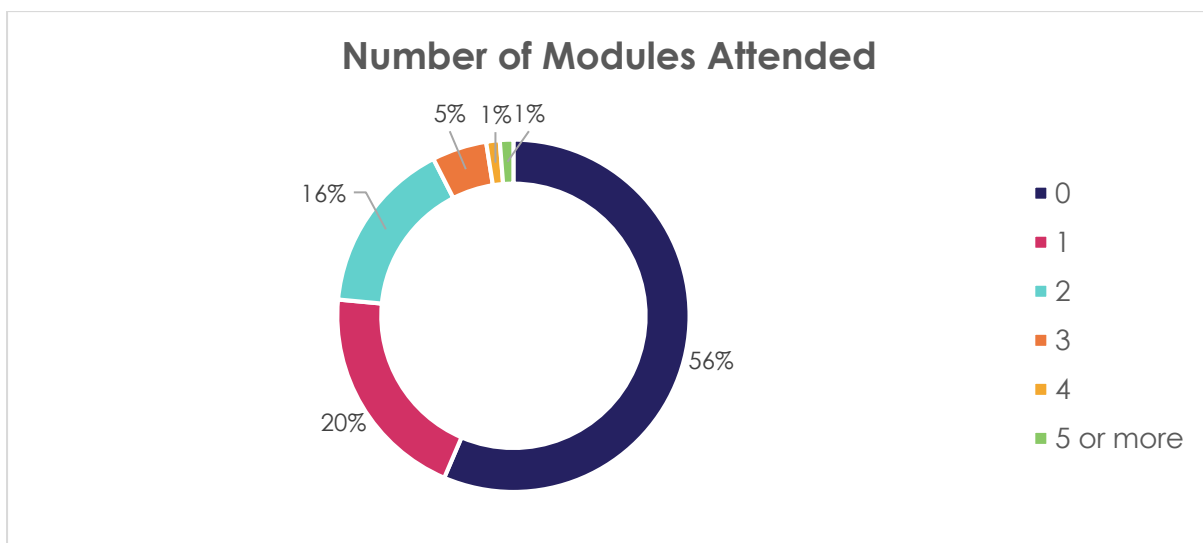
Overview

Up to the end of Q3, a total of **379** CoLP staff and officers successfully completed the minimum two Inclusivity Programme modules, representing **24%** of the Force.



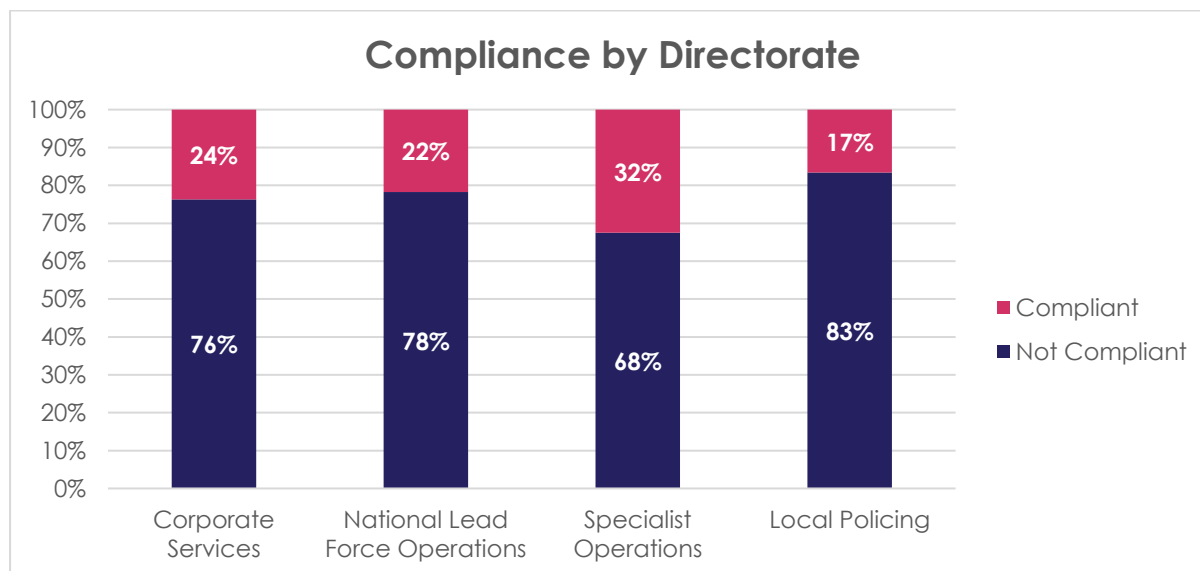
Overall, **56%** of CoLP (909 individuals) completed 0 modules, **20%** (323) completed one module, **16%** (258) completed two modules, **5%** (81) attended three modules, **1%** (20) completed four modules, **1%** (20) completed five modules or more.

While **56%** of the Force have not yet engaged with the programme, **44%** (702) have engaged to some extent with around **7%** (121) exceeding the mandatory requirement to attend two modules.



Directorate

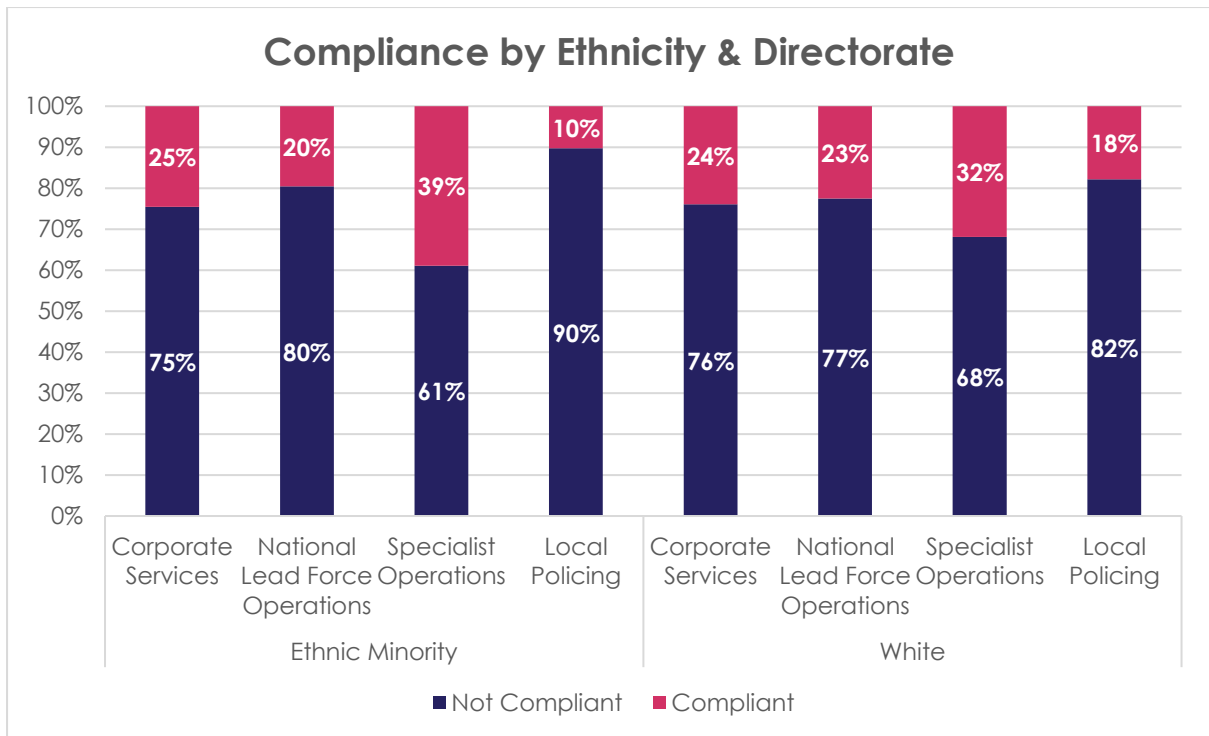
- Overall, **17%** (76) of Local Policing, **32%** (141) of Specialist Operations, **24%** (65) of Corporate Services and **22%** (97) of National Lead Force and are compliant.
- Local Policing have the lowest directorate compliance with the Inclusivity Programme and Specialist Operations have the highest compliance.



- As Local Policing is composed of a high percentage of Police Officers (85%), a high percentage of white employees (85%) and a high percentage of male employees (77%), it is important to explore the interactions between these features.

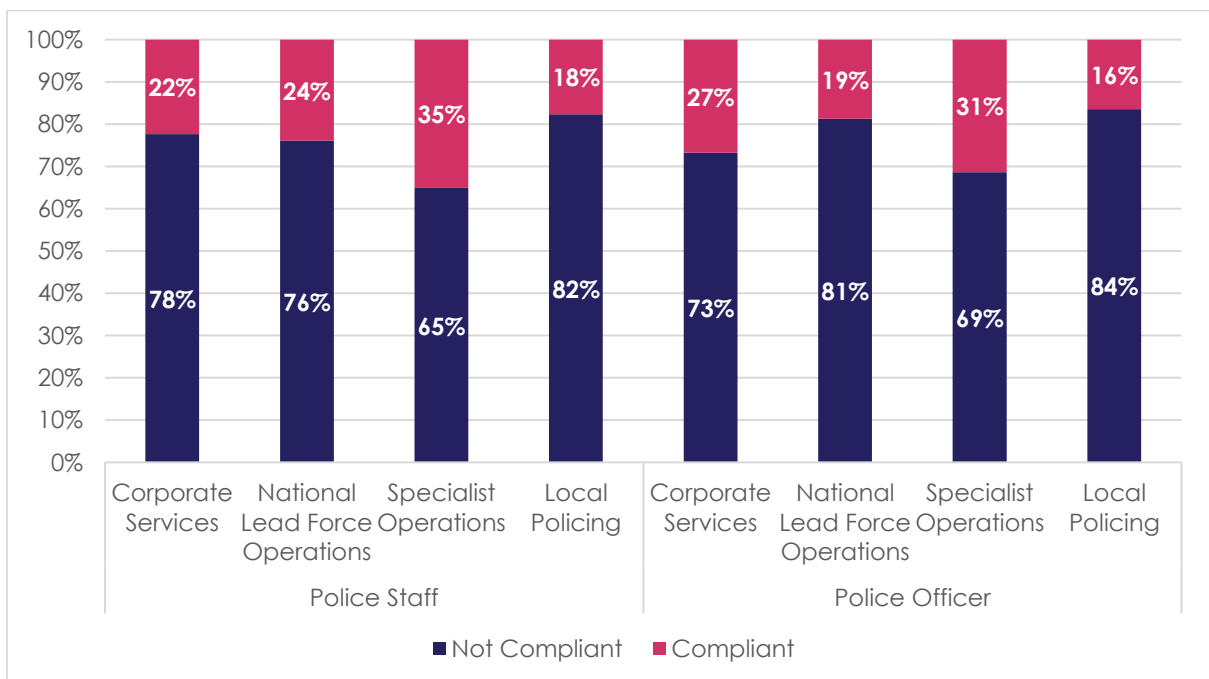
Directorate & Ethnicity

- The below graph shows a similar compliance rate amongst ethnic minority and white employees across the directorates.
- Local Policing has the lowest compliance for both ethnic minority and white employees at **10%** and **18%**, respectively. This suggests that the low compliance in Local Policing is not an ethnicity issue but a directorate issue within Local Policing.



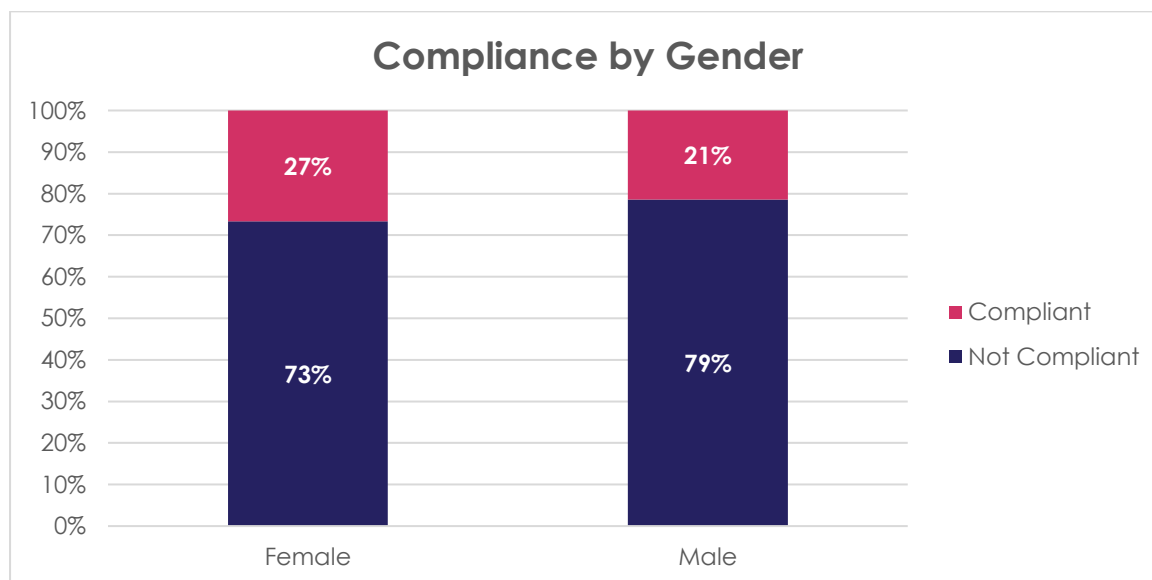
Directorate & Employee Type

- The graph below shows that, with the exception of Corporate Services, across directorates, Police Officers are less compliant than Police Staff. Local Policing has the lowest compliance rate with **16%** of Police Officers and **18%** of Police Staff.
- This suggests that the low compliance in Local Policing is not an employee type issue but a directorate issue within Local Policing.



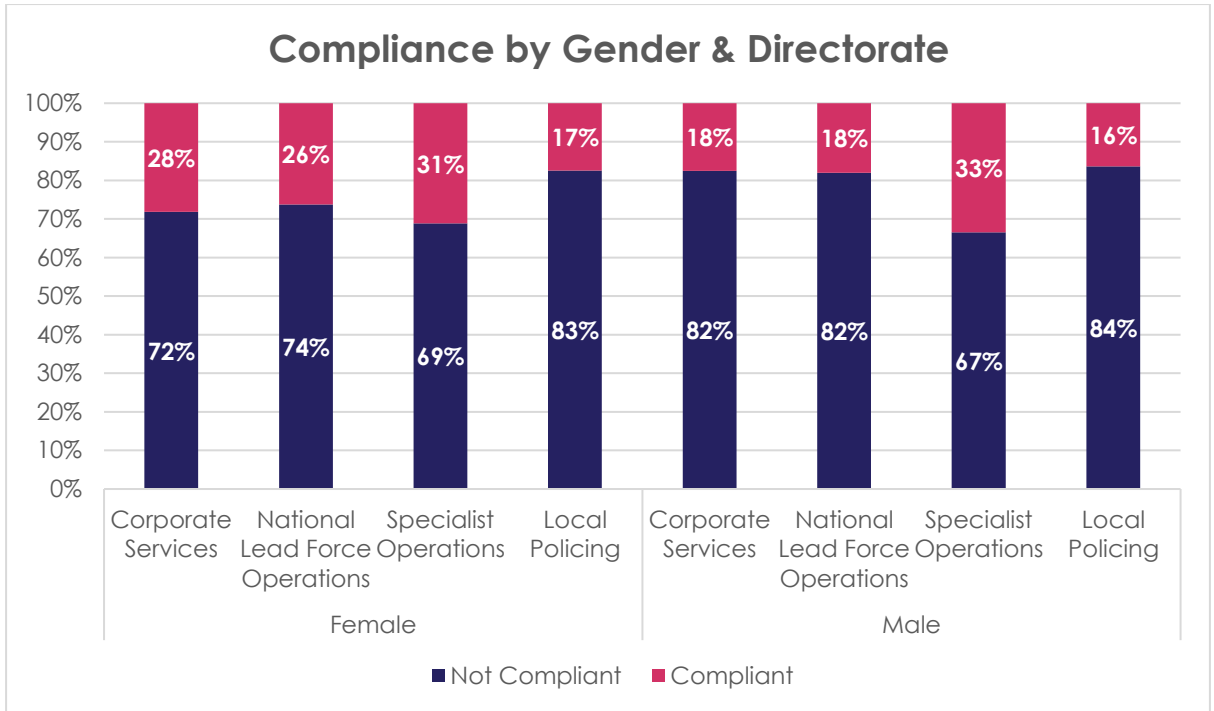
Gender

- Overall, **27%** (172) of females and **21%** (207) of males are compliant, having completed two or more modules.



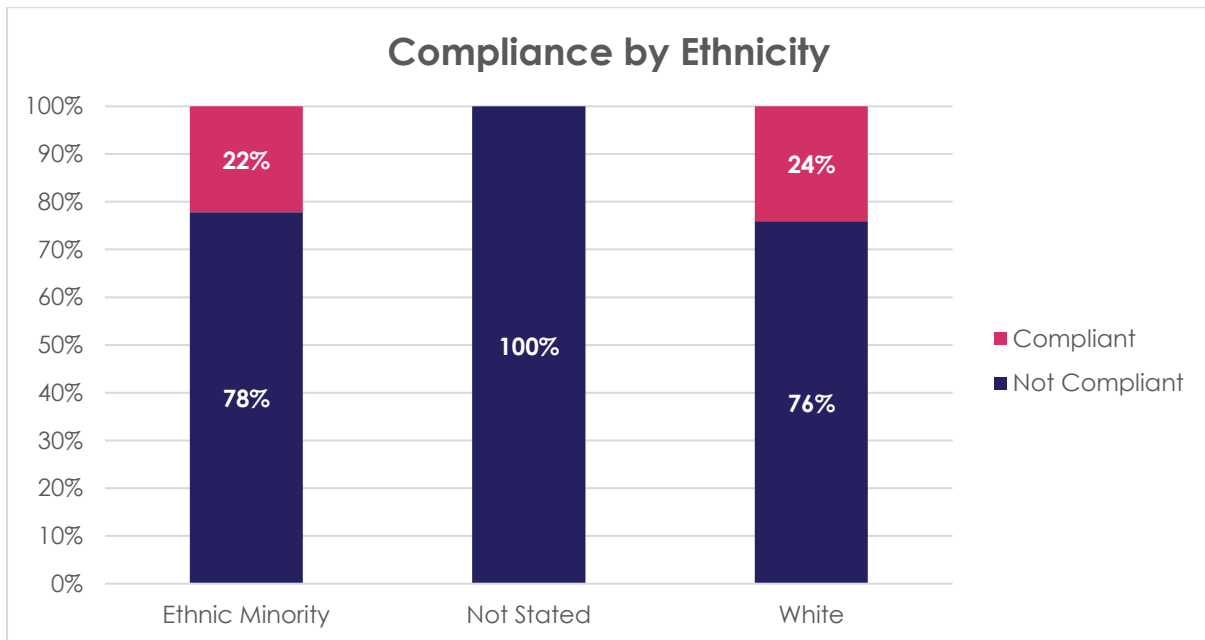
Gender and Directorate

- As gender proportions differ between the directorates, an analysis of compliance by gender across the directorates is needed.
- The graph below shows that males within Specialist Operations are the most compliant with the programme with **33%** (85) being compliant. Although this is broadly comparable with the compliance of females in Specialist Operations which sits at **31%** (56). This suggests there is no difference in compliance rates due to gender in the directorate.
- Males within Local Policing are the least compliant with the programme with **16%** (58) being compliant. Although this is broadly comparable with the compliance of females in Local Policing which sits at **17%** (18). This suggests there is no difference in compliance rates due to gender in the directorate.
- In both Corporate Services and National Lead Force, females are more likely to be compliant with the programme than males. In Corporate Services, **28%** (45) of females are compliant compared with **18%** (20) of males and in National Lead Force, **26%** (53) of females are compliant compared with **18%** (44) of males. This suggests a possible difference in compliance rates due to gender in these directorates.



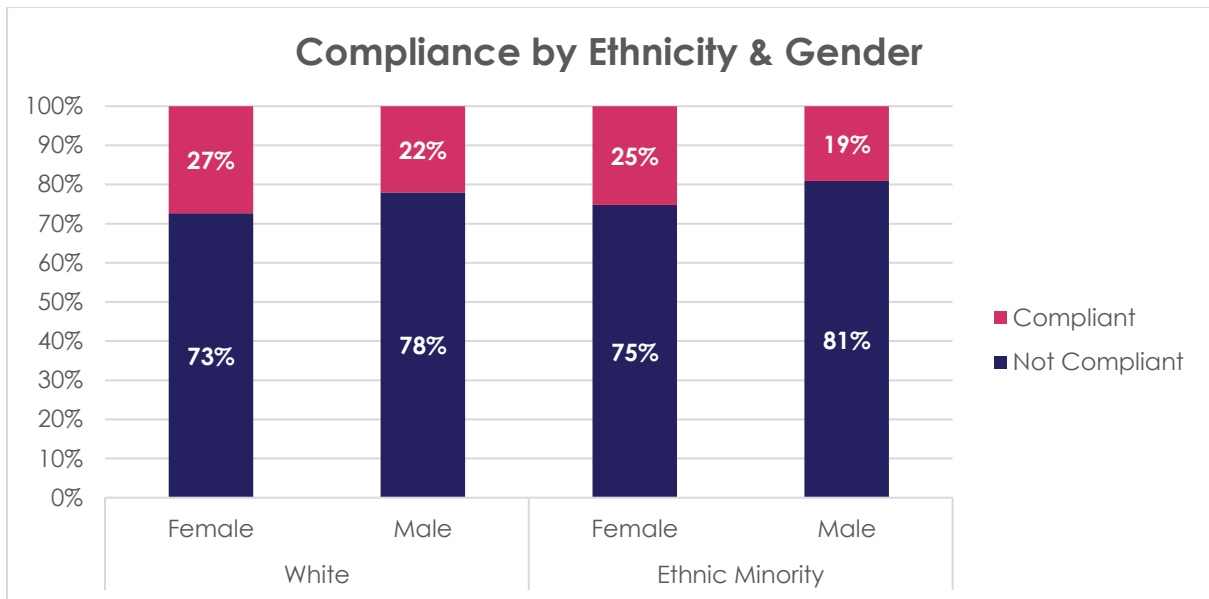
Ethnicity

- Overall, **22%** (59) of those from ethnic minority communities, **0%** (0) of those with no stated ethnicity and **24%** (320) of those who are white are compliant.



Ethnicity & Gender

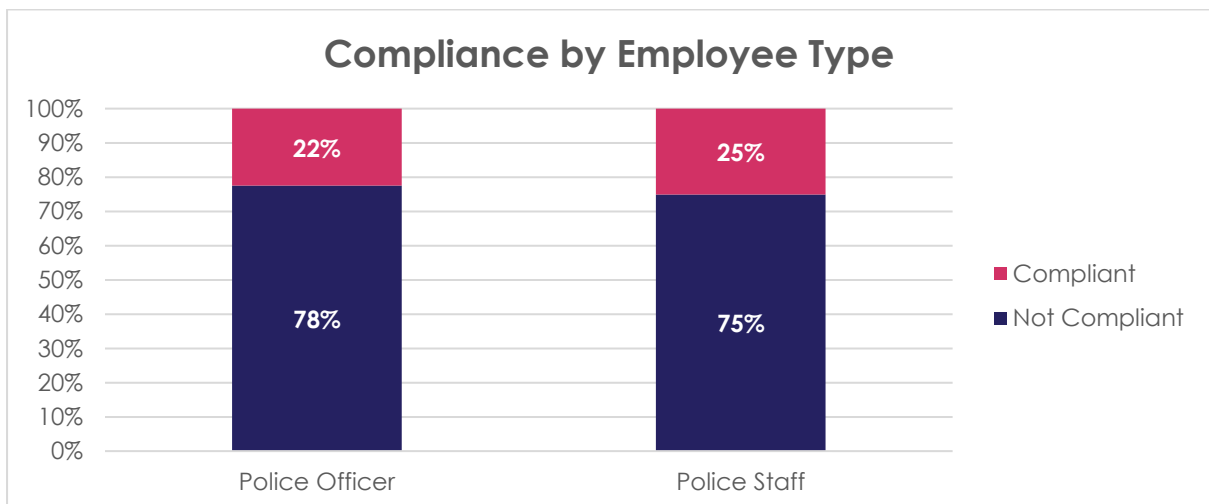
- The graph below shows that **22%** (182) of white males across Force are compliant compared with **27%** (138) of white females and that **18%** (34) of ethnic minority males across Force are compliant compared with **25%** (25) of ethnic minority females.



- This suggests that there are slightly lower compliance levels for males (of all ethnicities) compared with females. As discussed previously this trend appears to only be in two directorates.

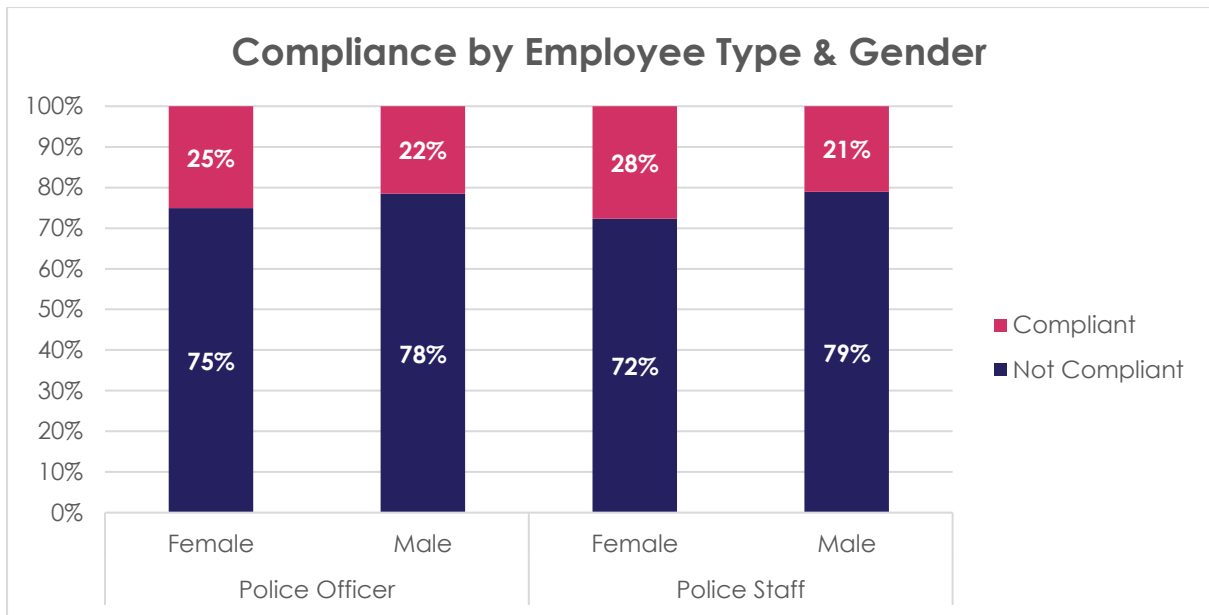
Employee Type

- Overall, **22%** (215) of Police Officers and **25%** (164) of Police Staff are compliant.



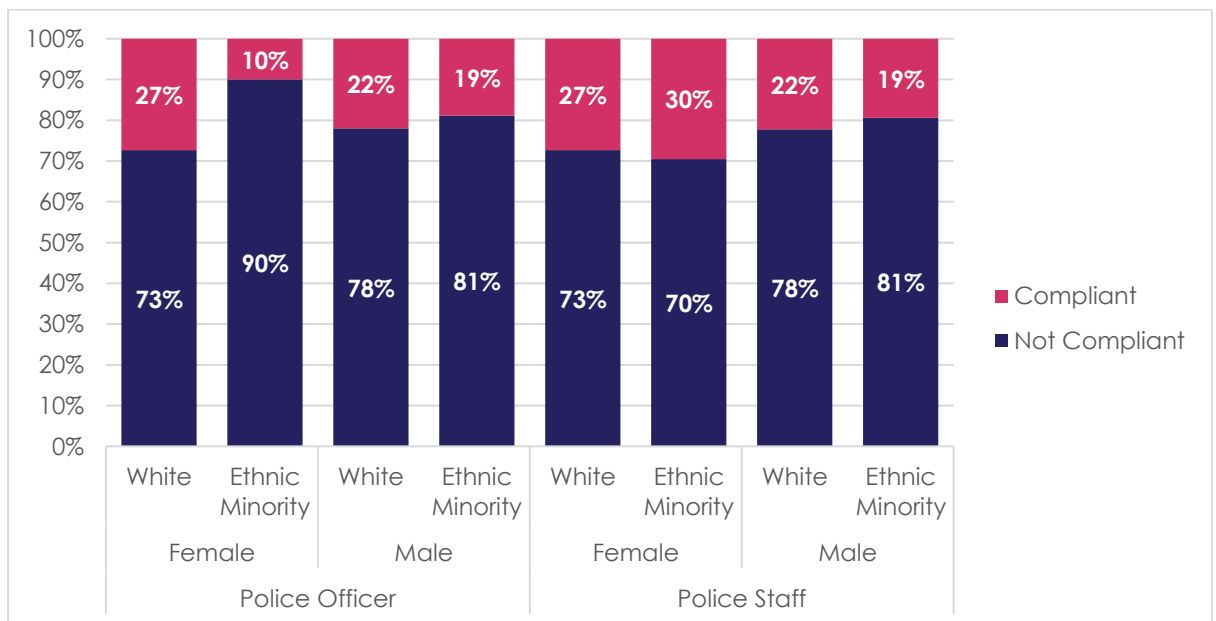
Employee Type & Gender

- The graph below shows that male Police Officers and male Police Staff are slightly less likely to be compliant than their female counterparts, with **21%** (153) of male Police Officers being compliant vs **24%** (62) of female Police Officers and **21%** (54) of male Police Staff vs **28%** (110) of female Police Staff. This suggests there is no compliance difference based on employee type, but again a slight difference based on gender.



Employee Type, Gender & Ethnicity

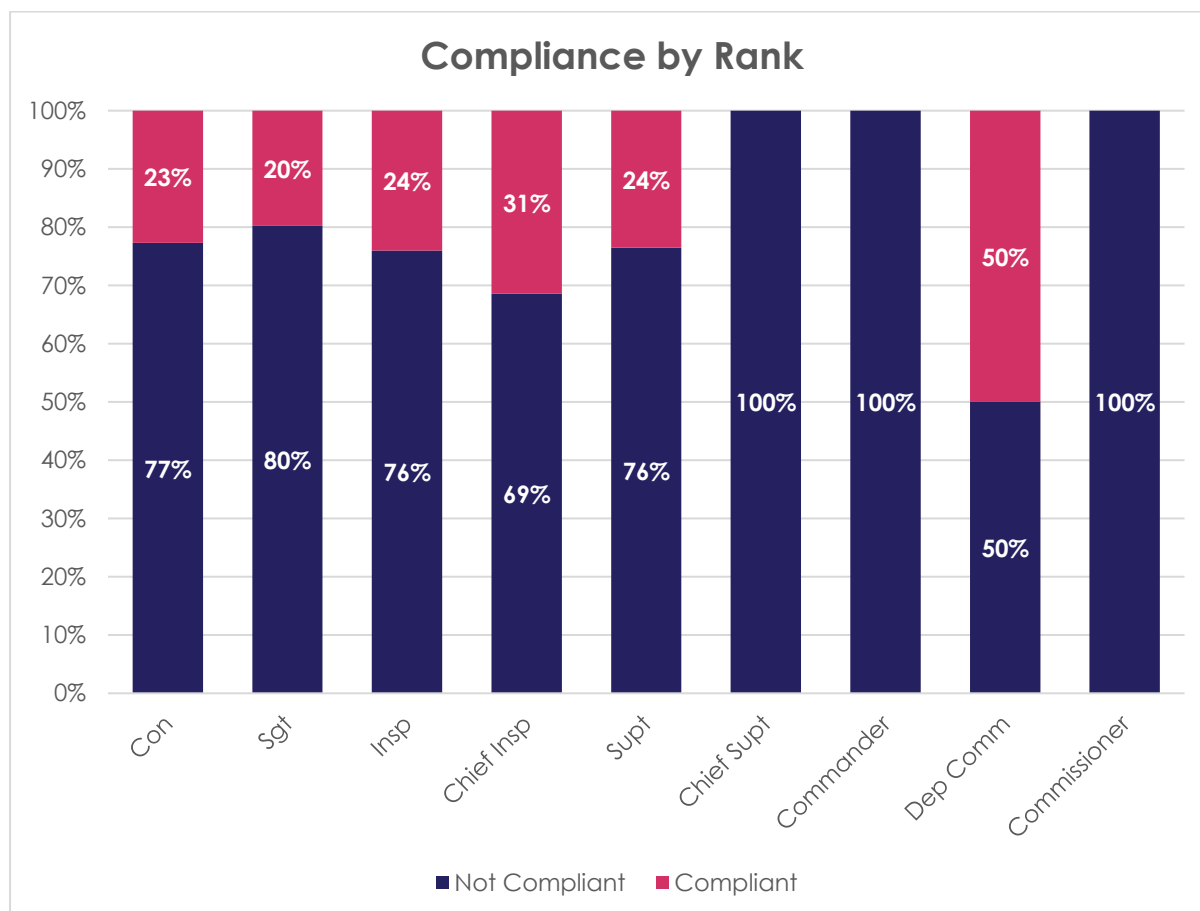
- The graph below shows that accounting for gender, ethnicity and employee type, compliance was lower for ethnic minority female Police Officers than any other group. An ethnic minority female Police Officer is almost half as likely to be compliant as a white female Police Officer and three times less likely to be compliant as an ethnic minority Police Staff member.
- (N.B. it should be noted that this is a smaller group overall which may influence the proportion)



Rank & Grade

Rank

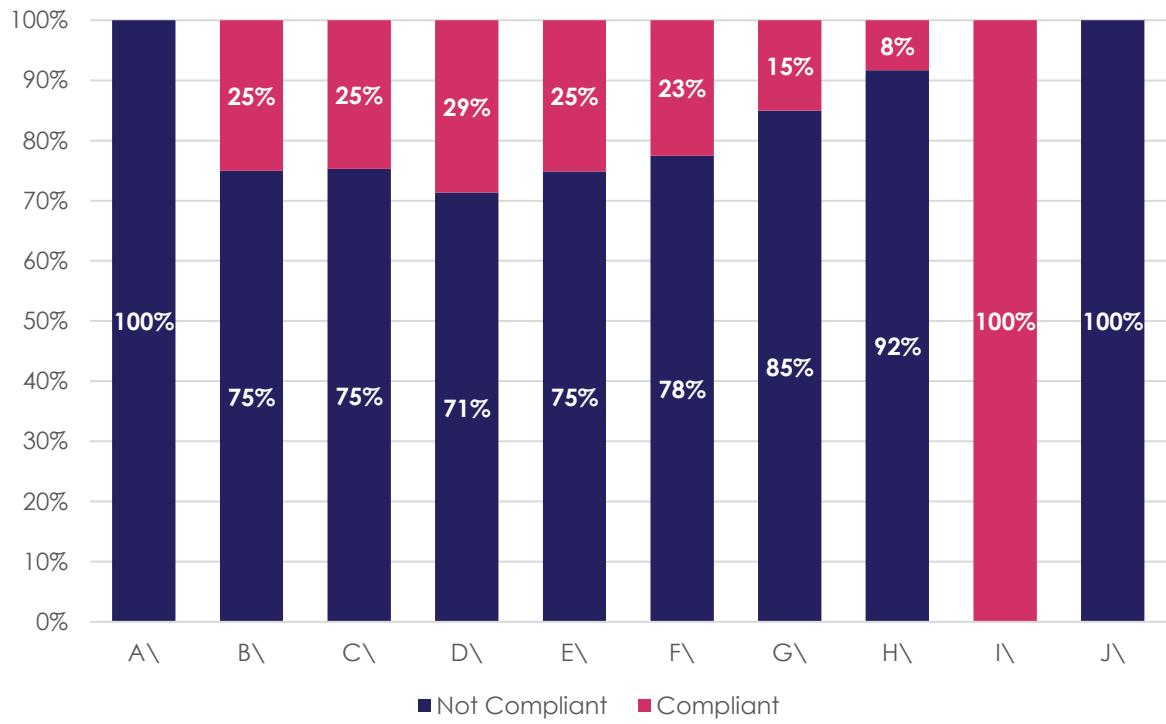
- Overall, **22%** (150) of Constables, **19%** (31) of Sergeants, **24%** (18) of Inspectors, **31%** (11) of Chief Inspectors, **24%** (4) of Superintendents and **50%** (1) of Deputy Commissioners are compliant.
- (N.B ranks include acting, temporary and substantive and both Police and Detective roles)



Grade

- Overall, **0%** (0) of A Grade*, **25%** (5) of B Grade, **25%** (43) of C Grade, **29%** (55) of D Grade, **25%** (47) of E Grade, **23%** (9) of F Grade, **15%** (3) of G Grade, **8%** (1) of H Grade are compliant and **100%** (1) of I Grade are compliant. J Grade were not compliant.
- This suggests broadly similar engagement across all grades up to F Grade and lower engagement with the most senior grades with a notable exception of I Grade
- (*N.B A Grade are apprentices and student placements)

Compliance by Grade



Team Compliance Levels

N.B The composition of these teams is according to the organisation structure as held on the HR system.

Corporate Services

- The teams with the highest level of compliance are Inclusivity, Culture & OD (78%), Information Technology (50%) and Change Portfolio Office (45%).
- The teams with the lowest compliance are Police Federation (0%), IMS (2%) and Corporate Communications (7%).

Local Policing

- The teams with the highest level of compliance are Special Constabulary Coordination (100%), Control Group 4 (60%) and Control Group 4 (56%)
- The teams with the lowest compliance are Contact Centre (0%), Cycle Team (0%), P&P Hub and Licensing (0%), Response Team B and D (0%), Sector Policing (0%) and Taskforce Operations (0%).

National Lead Force

- The teams with the highest level of compliance are Prevention Services (28%) and Reporting Services (33%).
- The teams with the lowest compliance are Report Fraud (0%) and ROCU (0%).

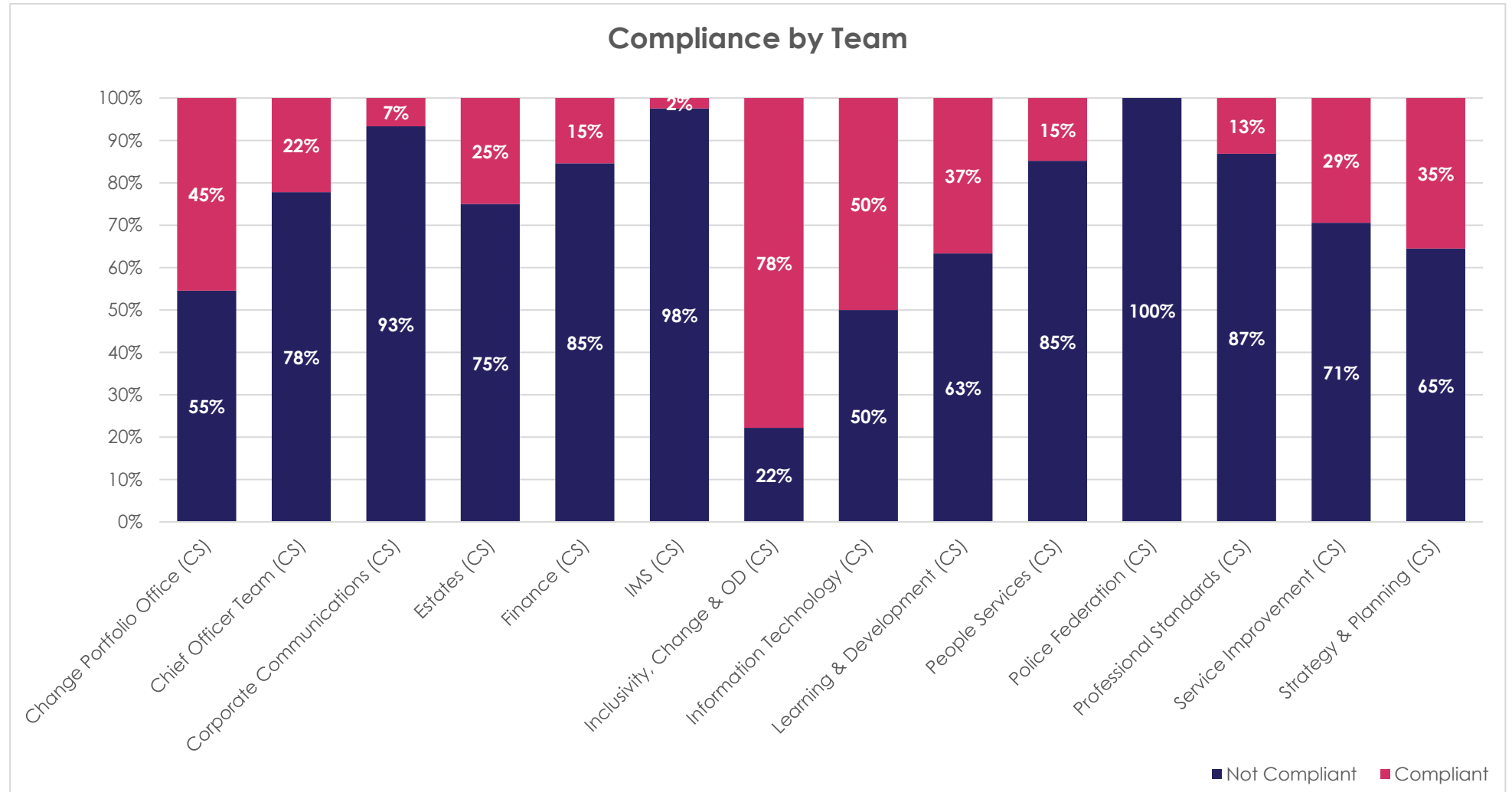
Specialist Operations

- The teams with the highest level of compliance are CT Policing (100%), CJS (100%), Intelligence Operations SLT (100%) and Intelligence Ops Team 1 (69%).
- The teams with the lowest compliance are Specialist Ops SLT (0%), CT Policing Team 1 (0%), Intel Dev – Cyber (0%), Intel Dev – Tasking & Coordination (0%), Intelligence Development SLT (0%) and Intelligence Ops Team 4 (0%),

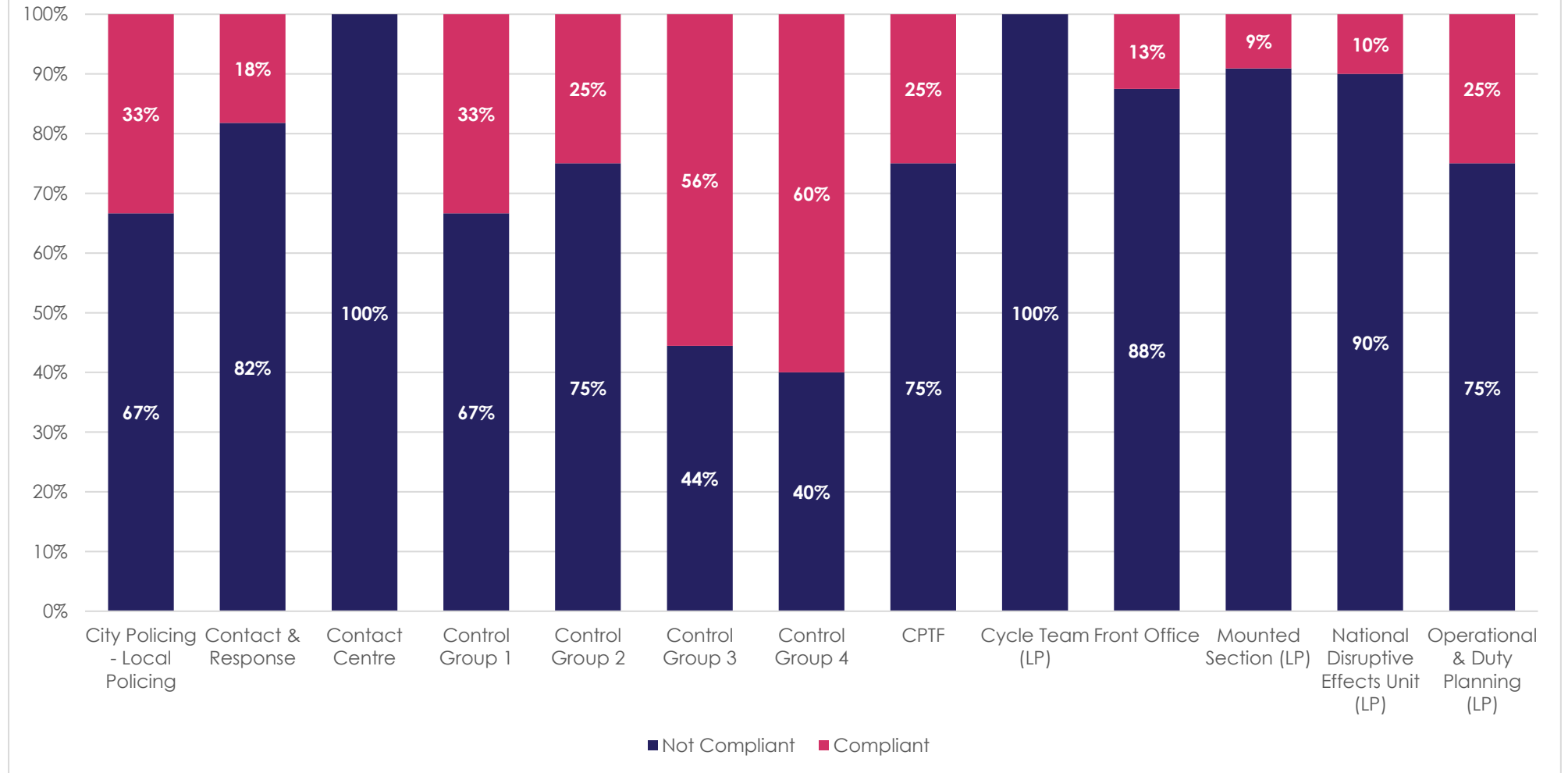
Team Compliance Levels

Corporate Services

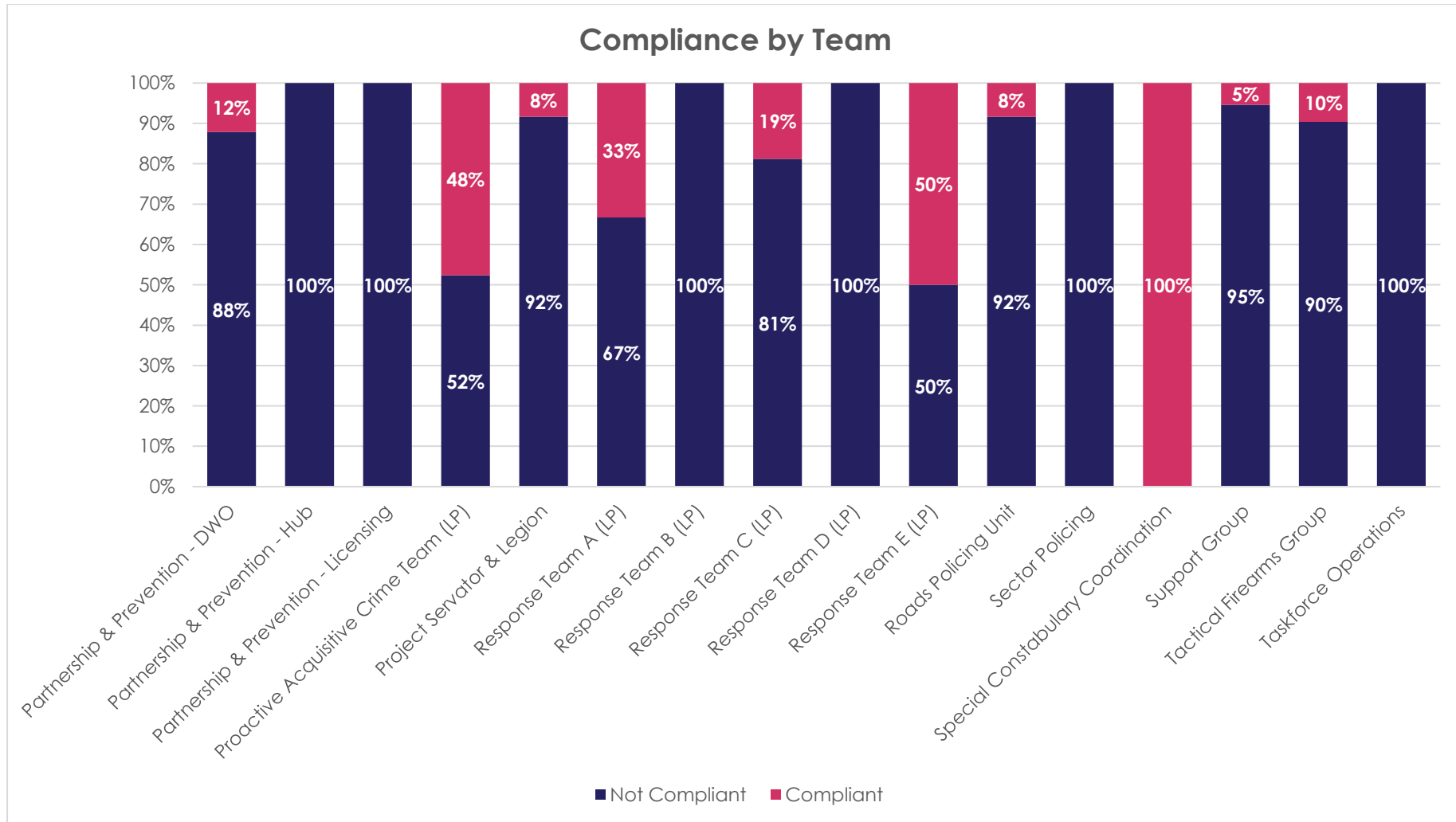
Compliance by Team



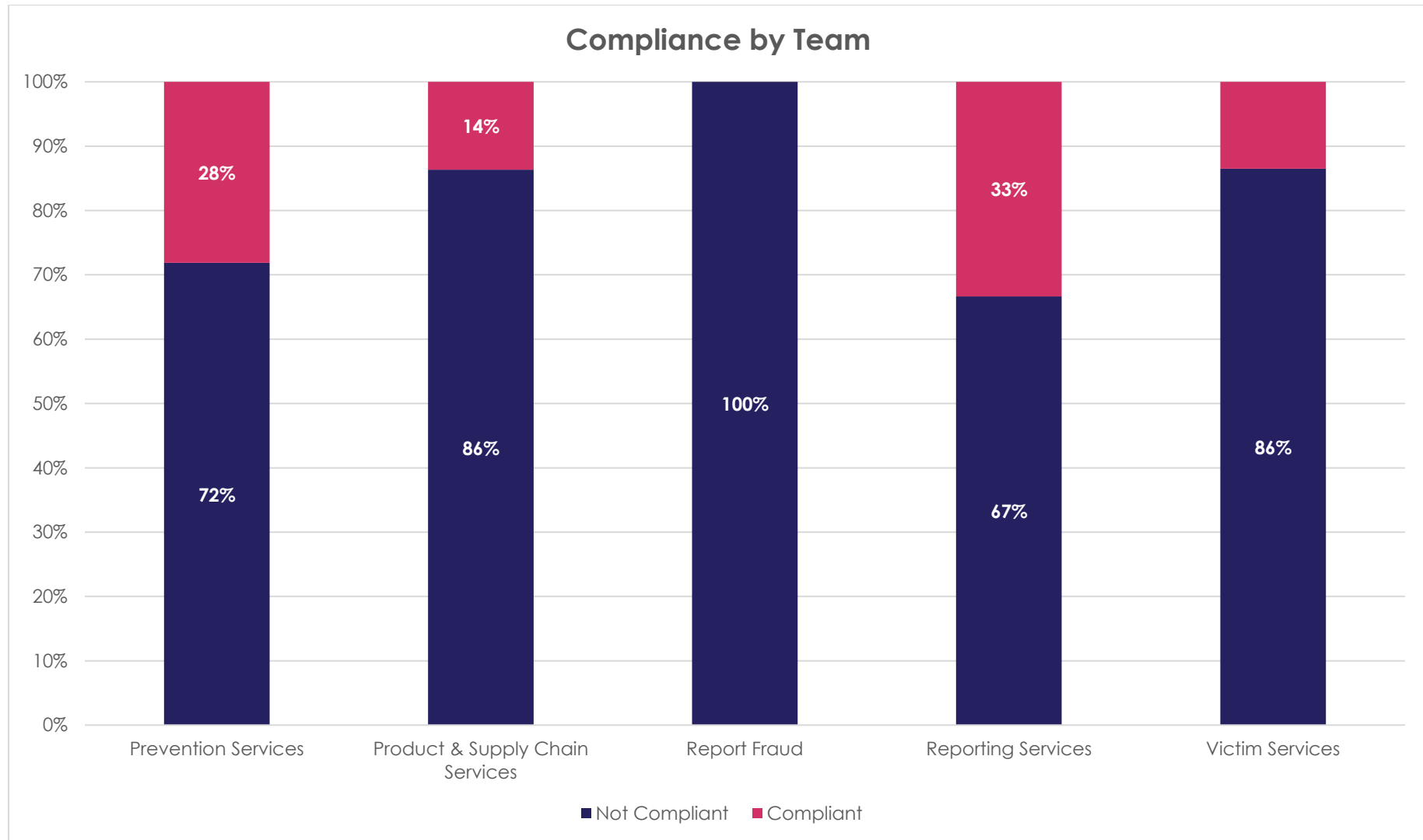
Compliance by Team



Local Policing (2 of 2)

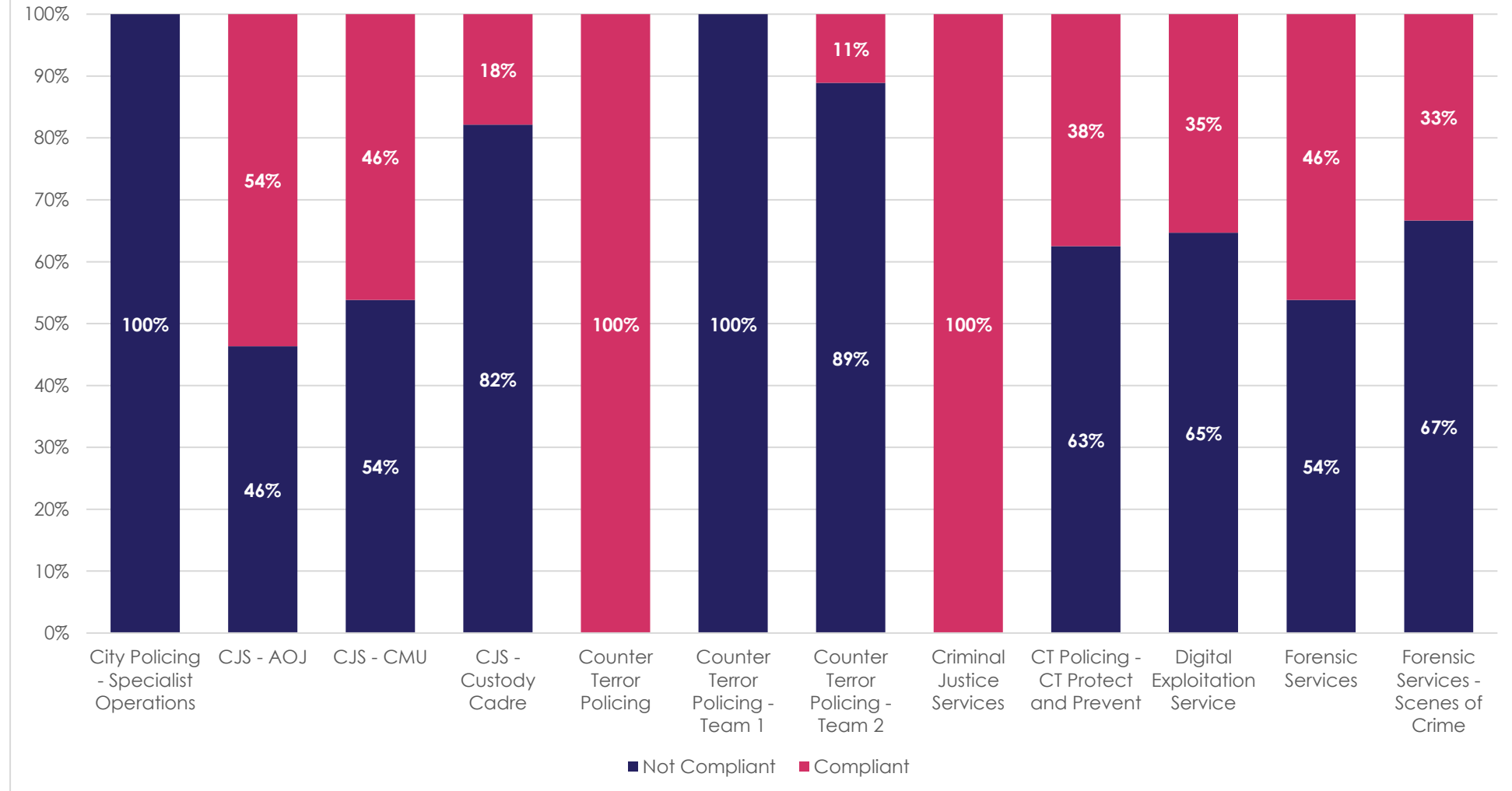


National Lead Force



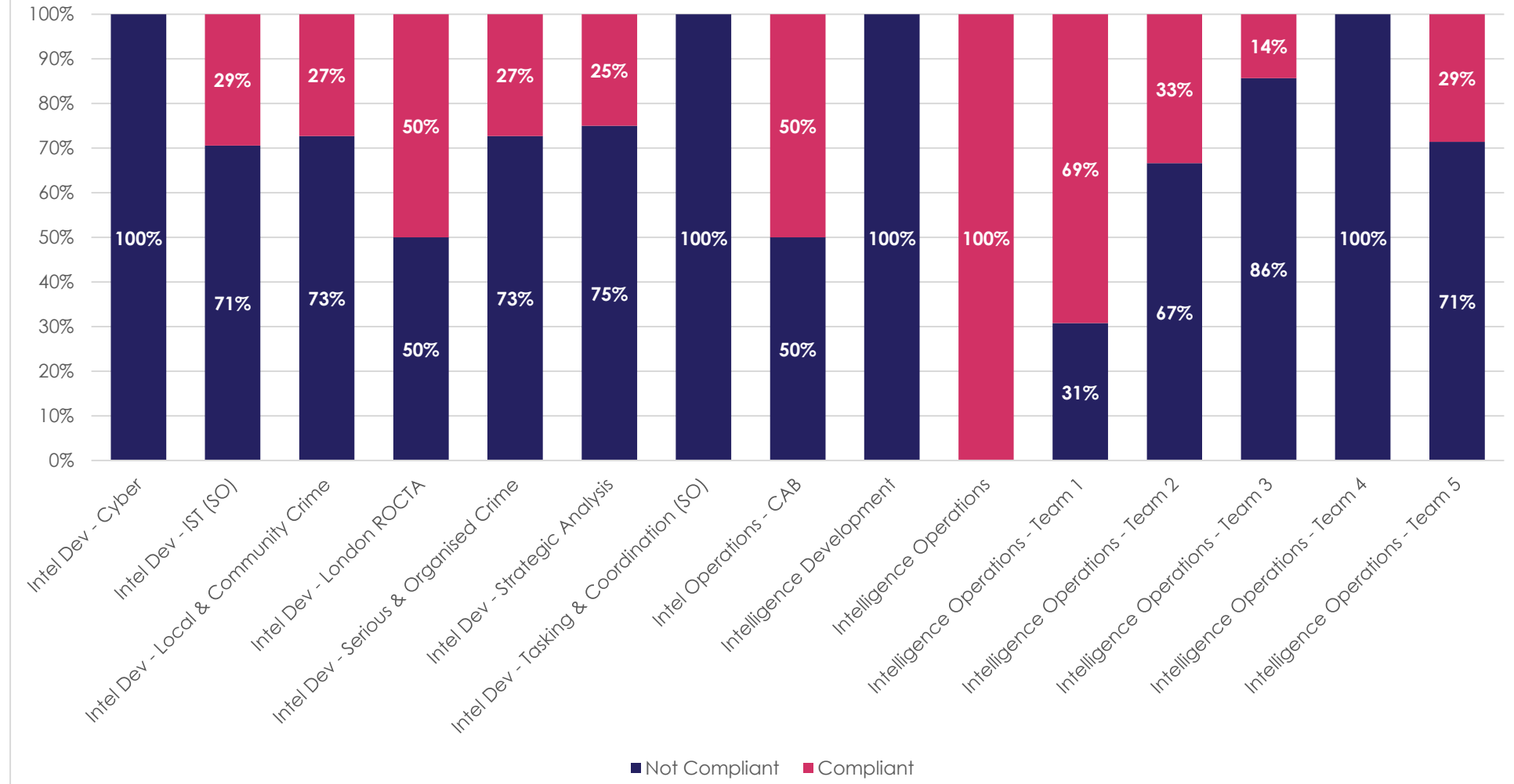
Specialist Operations (1 of 3)

Compliance by Team

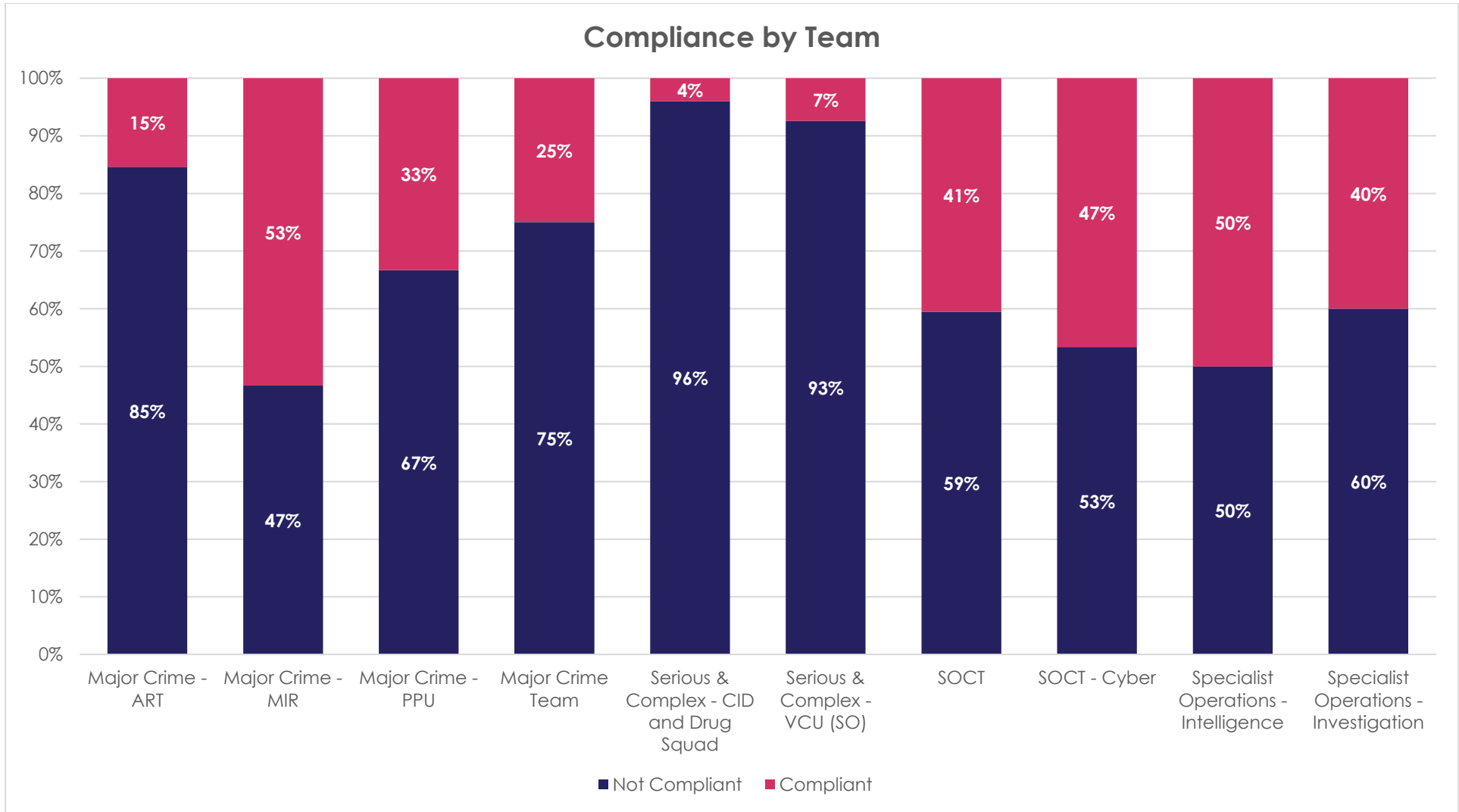


Specialist Operations (2 of 3)

Compliance by Team



Specialist Operations (3 of 3)



3. Summary

- Overall **44%** of the workforce have already engaged with the Inclusivity Programme in 2025/26 to some extent with **24%** attending the two or more required modules and a further **20%** attending one module.
- Local Policing currently have the lowest compliance of any directorate with **17%** compliance so far.
- There are slight gender differences in compliance but only within Corporate Services and National Lead Force where males are slightly less likely to be compliant.
- Looking at groups of employees by ethnicity, gender and employee type, ethnic minority female officers are currently less compliant than other groups (although it is noted this is a smaller group overall which may influence the proportion)
- Compliance is broadly similar across all ranks of officers up to Supt with lower compliance at the most senior ranks with a notable exception of Deputy Commissioner.
- Compliance is broadly similar across all grades up to F Grade with lower compliance at the most senior grades with a notable exception of I Grade

Improvements since Q2

The following improvements have been made in Inclusivity Programme compliance in the last 3 months:

- At the end of September 2025, a total of 638 Inclusivity Programme modules were attended/accessed, this almost doubled by the end of December 2025 to 1285
- At the end of September 2025, 10% of the Force had completed two or more Inclusivity Programme modules, this has increased to 24% at the end of December 2025. In addition, a further 20% of the Force have now also completed one Inclusivity Programme module bring overall engagement with the programme up to 44% compared with 26% in at the end of September 2025.
- All Directorates have seen increased compliance with the programme in the last 3 months, most notably within Specialist Operations, 8% of the directorate had completed the required two mandatory modules at the end of September 2025, this has now increased to 32% in Q3.

City of London Corporation Committee Report

Committee(s): Professionalism and Trust Committee – For Information	Dated: 02/02/2026
Subject: Professional standards, conduct, and vetting Update Q3	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides statutory duties • provides business enabling functions 	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	£-
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Commissioner of Police	
Report author: D/Supt Thomas Hill /PC Ann Roberts Professional Standards Dept	

Summary

- Overall, the volume of Complaints has decreased in Q3 in comparison to Q2 (by 10 cases, 19%). This remains below the national average in accordance with IOPC data.
- There have been 20 new Conduct Cases recorded this quarter (an increase of 1 (5%) from Q2).
- There remains a number of officers subject to long-term suspension. Many relate to misconduct cases held sub-judice awaiting results of long impending criminal investigations or trials. Our forecasting expects that this may amount to 4 Gross Misconduct hearings over the next 6 months.

Recommendations

Members are asked to:

- Note the report.

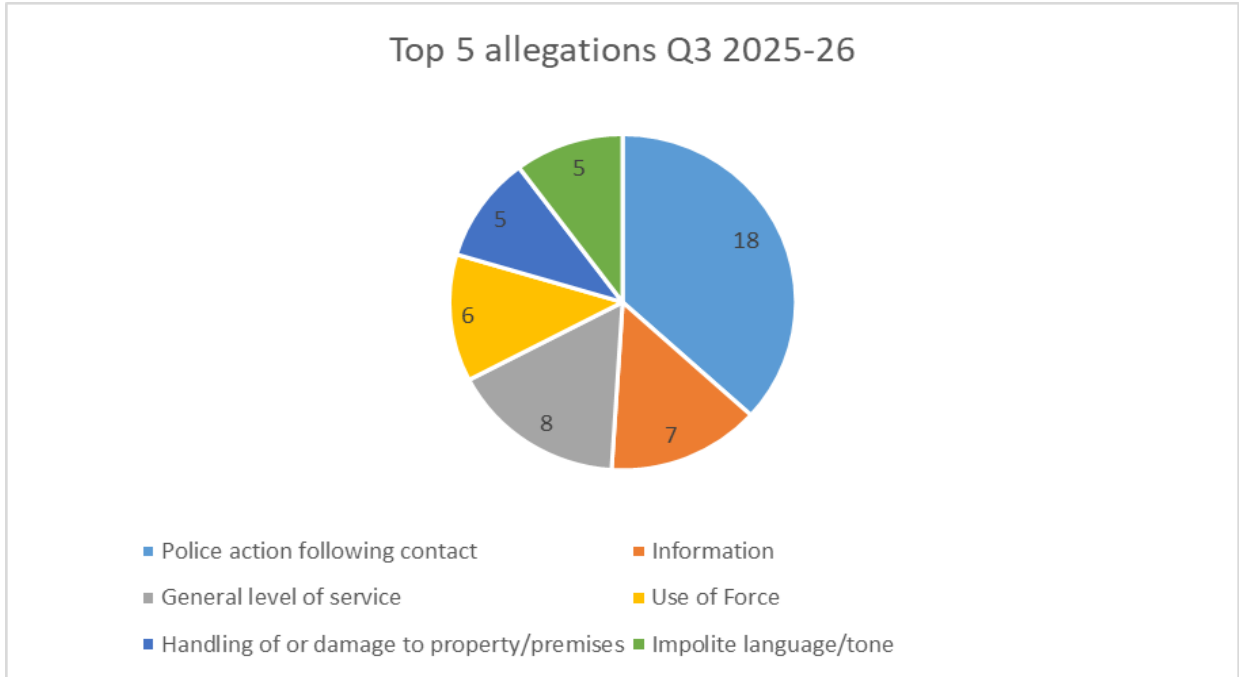
Main Report

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

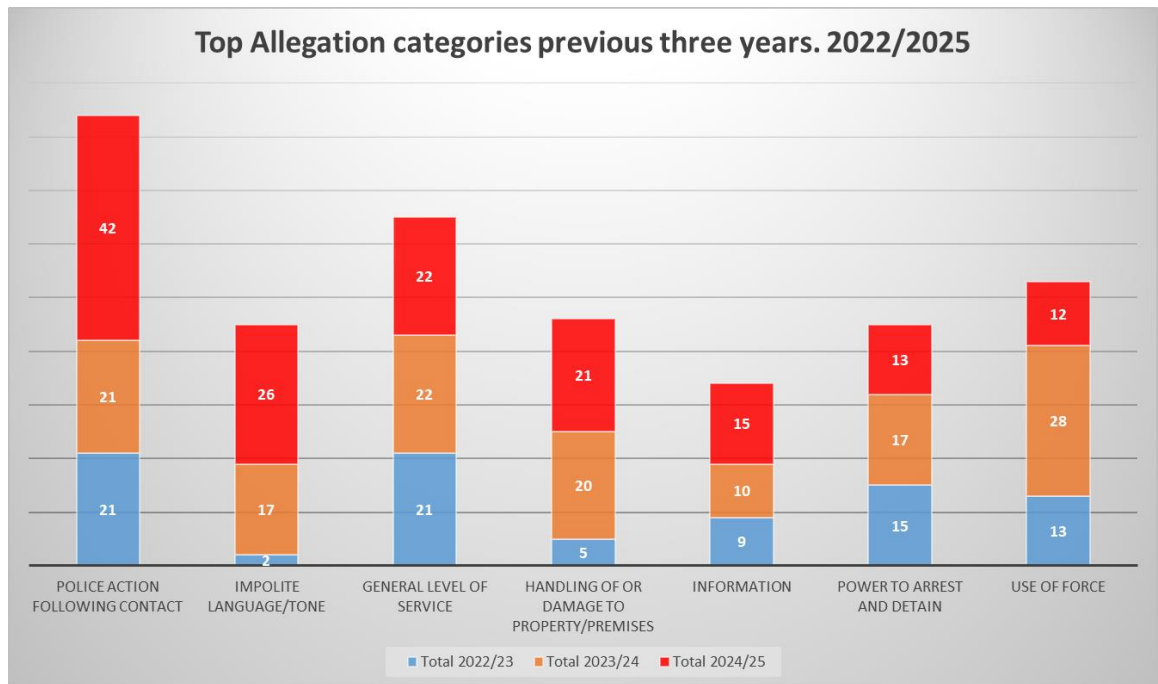
- **Complaint volumes, content, and performance –**

1. This document contains the statistics prepared by Professional Standards for the third quarter of 2025/26 (Oct-Dec).
2. This quarter the total number of CoLP complaint cases logged is 43.
3. This is separated into 13 dealt with under Schedule 3 of the Police Reform Act 2002 and 30 not within Schedule 3. This figure of 43 complaints is a decrease of 10 cases compared against Q2 where a total of 53 complaints were logged: 14 under Schedule 3, and 39 not within Schedule 3. Compared against the same period (Q3) last year 2024/25 the total number of CoLP complaint cases logged was 41. (4 Schedule 3 and 37 not within Schedule 3).
4. Of the 85 allegations recorded during Q3 2025/26 the highest number were in the categories of: Police action following contact (18) General level of service (8) Information (7) Use of Force (6) Handling/damage to Property (5) Impolite language and Tone (5).
5. This is a decrease in allegations recorded against Q2 of 9 (10%).
6. Q3 has six of the highest allegation type categories featured in the overall 'Top allegation types' against the full year 2024/25 data which are: General level of service, Police Action following contact, Information, Use of Force, Handling of Property 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.

Top 5 allegations Q3 2025-26



Top Allegation categories previous three years. 2022/2025



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.

This is also being supplemented by a new PSD Learning Forum which on a monthly basis reviews all learning from the IOPC, NPCC, Home Office, external agencies and

case law. This ensures that learning and changes to practice are disseminated to the appropriate oversight area and implemented without delay.

Q3 – Data examination: -

10. Analysis of the highest allegation categories (the latest Q3 is compared against both the previous quarter(s) and the total years (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 Q3 39% Organisational type allegations were recorded (Q2 = 46%)
11. The total number of allegations finalised during Q3 is 76 compared to 86 in the previous quarter.
12. Of the 76 allegations finalised:
 - 37 Resolved
 - 29 Service provided was acceptable
 - 4 Service Not acceptable
 - 4 Not resolved/No further action
 - 2 Not determined
13. The four allegations finalised where the Service provided was NOT acceptable relates to two cases. Case 1: allegation types logged as Handling of property, Information & Unprofessional attitude. Case 2: allegation type logged General level of service.
14. To note, cases often contain more than one allegation; the number of cases finalised in Q3 is 44, compared to 52 finalised in Q2.
15. Of the cases finalised 13 were logged as Schedule 3, and 31 were not under Schedule 3. There were no cases finalised under the previous regulations.

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

16. During this quarter, 20 conduct investigations were recorded, and 6 investigations were finalised. There are currently 58 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 Discreditable conduct and into Honesty and Integrity matters or Authority, Respect and Courtesy

such as theft/fraud related matters i.e. inappropriate use of ATOC travel, selling of police equipment. Or bullying type matters.

17. In total 6 Conduct matters have been finalised (Hearings/Meetings may have been held in a previous quarter):

- 5 cases – No case to answer
- 1 case – Case to answer – no action.

18. Whilst some of these cases have returned a No case to answer result, there is often learning either for the individual or the organisation that has been identified during the investigation. These will also be picked up by the PSDWG.

19. During Q3, no Misconduct Hearings or Meetings were held.

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

20. The Professional Standards Department continues to prepare for a HMICFRS Integrity Inspection (due in 2026). A Readiness Assessment, completed by our service improvement team was inducted in September 2025, which benchmarked current performance against the HMICFRS assessment of 'Good'.

The Readiness Assessment identified 40 recommendations; progress is outlined below:

Se 2025 Actions		Complete	In Progress	
Red	16	14	2	
Amber	24	14	10	
Total in Completed			28/40	70%
Dec 2025 Actions		Complete	In Progress	
Red	7	0	7	
Amber	5	0	5	
Total Completed			0/12	0%

The Service Improvement Team re-visited PSD in December and confirmed closure of the above actions. A total of 12 new recommendations were identified which continue to be worked on. Some of the new actions may be slower to progress due to interdependencies, resourcing considerations and senior management approval.

Progress across these recommendations is being overseen by a dedicated Inspector within PSD, reporting directly to the Head of PSD. Departmental performance in this area is held to account through weekly Readiness Assessment progress meetings with the Head of PSD, monthly departmental performance meetings, monthly reporting to Deputy Commissioner Betts and reporting to the Organisational Improvement Board.

- **Vetting**

21. The continuous improvement Action Plan for Vetting established in summer 2024 maintains progress and a number of the actions are also captured within our HMICFRS readiness assessment. Last quarter 80% of actions were reported as completed. The updates of these actions remain consistent, however with support from the service improvement team we have adopted a higher threshold of compliance, meaning that some actions have been re-opened for further work. This has brought the completed actions back to 65% in Q2, and as anticipated, the figure significantly increased in Q3 with 80% of actions being reported as completed. The final actions are large pieces of work including introducing open-source software to increase speed in completing social media checks, linking Origin and Core-Vet, ensuring everyone working within Vetting has a 2 year FTC as minimum, and deleting a total of 55,000 records to ensure data quality, which would be around 1,000 hours of work.

Overview of Action Plan:

Actions	RAG Rating				Total
	Very High	High	Medium	Low	
Number of Actions	3	21	15	4	43
Completed	2	20	9	4	81 (%)
In Progress	1	1	6	0	19 (%)
Not Started	-	-	-	-	0

Operation Jorica

Recent national media coverage reported the findings of an independent review into historic vetting practices within the Metropolitan Police Service (MPS), identifying significant and systemic failures in recruitment and vetting controls over several years. During the police uplift programme (PUP) some individuals were risk managed into the organisation only after completing all local checks which assesses against force level risk to systems, data and people; while awaiting national security vetting results.

All City of London police officers and staff hold in date vetting to the correct level, except for six individuals currently either going through a withdrawal process or re-vetting process.

The use of risk managed entry is now only used in limited and exceptional cases once local checks and risk assessment have been completed. These exceptional cases must be authorised by Deputy Commissioner, Local.

The City of London vetting unit is APP compliant. This includes the introduction of annual integrity checks, annual integrity screening, randomised vetting checks, reviews and or re-vetting for all internal moves and promotions.

- **Forward look**

- **Engagement:**

- A Listening Circle took place in October 2025, prompted by the Panorama BBC documentary, to provide an outlet for staff concerns. This followed on from the successful Listening Circle in September 2025 which specifically focused on inappropriate behaviour from men towards female employees.

- An area previously identified at a Listening Circle was the need for increased peer support across directorates. PSD already have a SPOC (Specified Point of Contact) in each directorate however these are at a senior level with a more strategic function. PSD are working with Professionalism and Trust's (P&T) Inclusivity, Culture and Organisational Development (ICOD) team to explore utilising this team at a more operational level to offer support, advice and sign-post. This will give confidence and empower supervisors to challenge and deal with low level issues to prevent escalation. This will be supported by an interactive engagement session which will discuss how to challenge and address low level conduct that doesn't meet the misconduct threshold but undermines police standards and contributes to poor culture.

- The first dilemma poll released in November 2025 gave all employees a scenario involving improper sexualised off-duty behaviour. Positive feedback was received and the theme of supervisor support for appropriately managing issues will be taken forward this quarter through a supervisor 'focus-on' session. The data has also been used to support further Active Bystander training for the force. To gain a more comprehensive picture a follow-up dilemma poll with a similar scenario will be sent out during the next quarter and will track improvements in knowledge and behaviour as a result of the first.

- The second edition of our new-look Professionalism newsletter was published in December, an intentional timing for the festive season, a natural time for celebration. PSD published an important reminder about alcohol consumption and maintaining standards behaviour. Reenforcing CoLP journey to 'be one of the most inclusive and trusted police forces in the country', and in line with the Policing Plan 2025-28, and the vital part that we all continue to live our values of 'professionalism', 'integrity' and 'compassion' on and off-duty, when at work and in our personal lives.

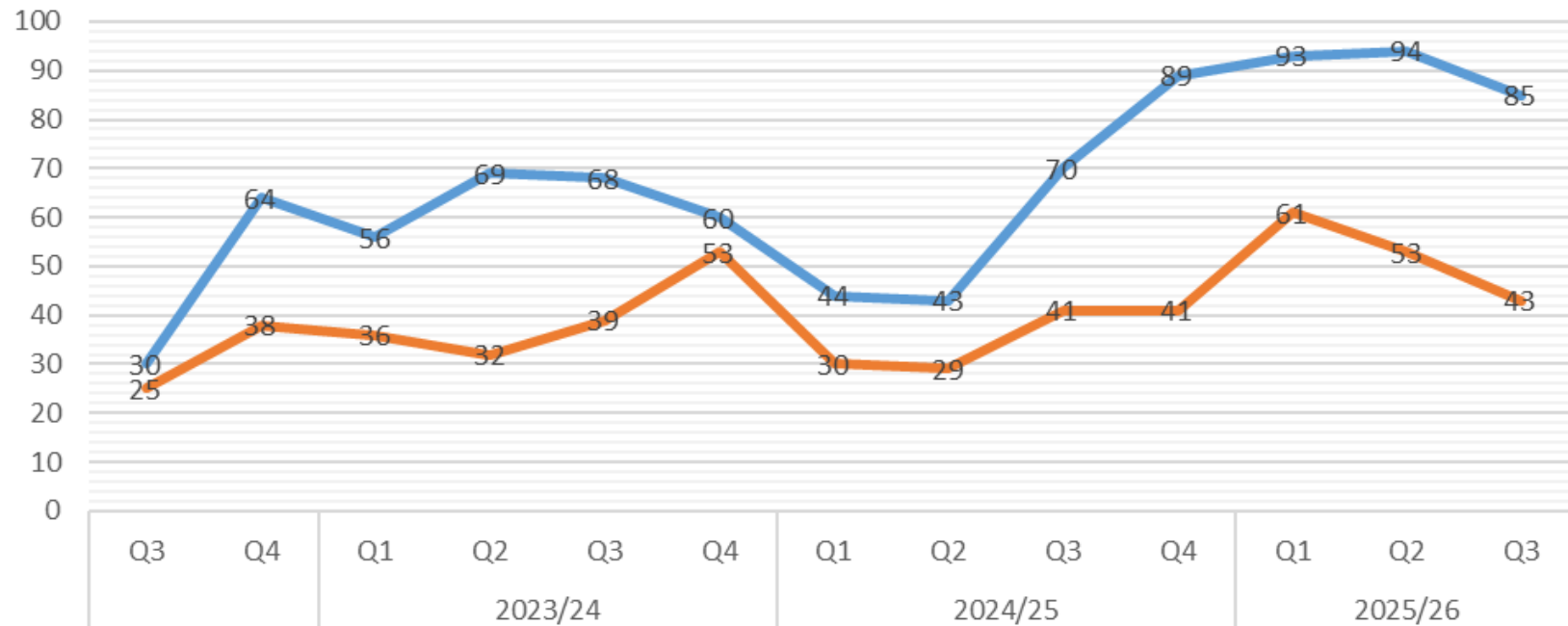
- The newsletter also contained:

- important updates related to professional standards and expectations on conduct and integrity.
 - news recently shared by Professional Standards.
 - lessons learnt from complaints and conduct cases in force and across the UK; and

- how to protect yourself and your colleagues, and how to report inappropriate behaviour and misconduct.

City of London Complaint Data

CoLP Allegations Recorded/logged CoLP Complaints Cases Logged



Summary of public complaints data – Q3 2025/26						
Metric	Current quarter (Q3)	Previous quarter (Q2)	Previous year (Q3)	(%) change (Q on Q)	(%) change (Y on Y)	Comment
Complaints – Schedule 3	13	14	4	7%	225%	A total of 43 cases were logged in Q3 2025/26. This is a decrease of 10 cases (19%) against Q2 2025/26

<p>Complaints – not Schedule 3</p>	<p>30</p>	<p>39</p>	<p>37</p>	<p>23%</p>	<p>19%</p>	<p>The average number of cases logged over the previous 5 quarters is 48 per quarter, Q3 is below average.</p>
<p>Allegations</p>	<p>85</p>	<p>94</p>	<p>43</p>	<p>10%</p>	<p>98%</p>	<p>There were 85 allegations recorded in Q3 2025/26. This is a decrease of 9 allegations from Q2 2025/26</p>

The average number of allegations over the previous 5 quarters is 86 per quarter. Q3 is below average.

Average time to log complaints (days)	N/K	4	1			<i>Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.</i>
Average time to contact complainant (days)	N/K	3	1			
Complaints finalised – Schedule 3	13	18	9	28%	44%	Total of 44 cases were finalised in Q3. This is a decrease of

Complaints finalised - not Schedule 3	31	34	36	9%	14%	8 cases from Q2 2025/26
Average time to finalise complaint cases (days) – Schedule 3 (including subjudice time YTD)	N/K	76	110			<p><i>Timeliness is taken from IOPC published bulletins and available retrospectively.</i></p> <p><i>Q3 2025/26 data is not available at time of writing</i></p>

Average time to finalise complaint cases (days) – not Schedule 3 (YTD)	N/K	18	43			
Applications for review sent to local policing body	0	0	0	0%	0%	
Applications for review sent to IOPC	0	0	0	0%	0%	

Nature of allegations – Of the 85 allegations recorded during Q3 2025/26 the highest number were in the categories of Police Action following contact (18) General level of service (8) Information (7) Use of Force (6) Handling/Damage to property (5) Impolite language/tone (5)

This is a decrease in allegations recorded against Q2 of 9

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%

Q3 2025/26 contains all of the above top allegation types. Police action following contact was highest at 21% this quarter. Police action following contact remains the highest allegation category YTD.

Handling of/and or damage to property had dropped out of the top allegations in Q1 2025/26, however has returned to the top 5 in Q2 and Q3.

General level of Service and Police action following contact have featured in the annual top 5 data 2022/23, 2023/24 and 2024/25.

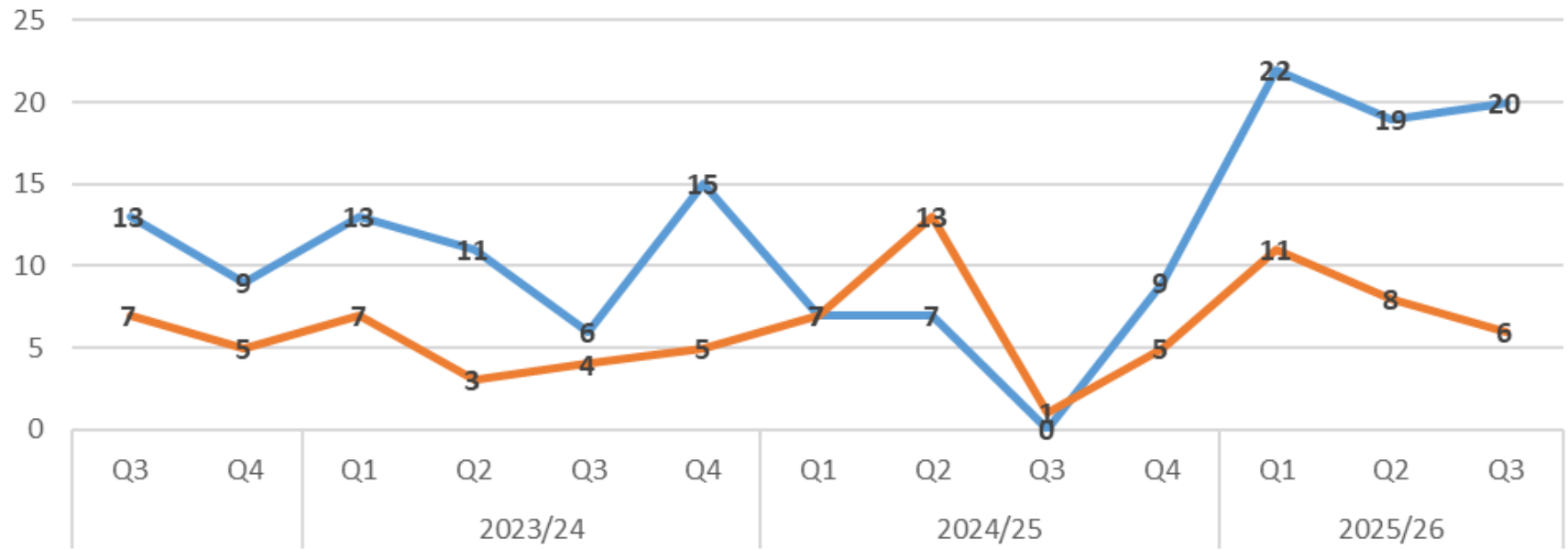
Ethnicity and discriminatory behaviour –

56% of complainant's ethnicity is recorded as Unknown and 2% 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 were five allegations (within 5 cases - 2 non-schedule 3 and 3 Schedule 3) of Discriminatory Behaviour logged during this reporting period (4 Race and 1 Disability allegations).

City of London Conduct Data

Conduct Cases Recorded Conduct Cases Finalised



Summary of internal conduct cases and investigations– Q3 2025/26				
Metric	Number	Previous quarter (Q2)	# (%) change (Q on Q)	Comment
New conduct investigations recorded	20	19	5%	
Total live conduct investigations	59	58	2%	Total live cases of which a number are sub-judice
<i>Of which gross misconduct</i>	20	28	29%	Currently assessed within Live cases
Conduct investigations finalised	6	8	25%	
Investigations finalised within <30 days	6	6	0%	
Officers and staff on suspension	11	13	15%	Includes officer under IOPC investigation
Officers and staff on restricted duties	6	7	14%	Includes officer under IOPC investigation

IOPC independent investigations

3

3

No change

Accelerated misconduct meetings held Q3

None held

Misconduct meetings / hearings held Q3

Misconduct Hearing – None held.

Stage 3 Proceedings - None held.

Misconduct meeting – None held.

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 Q3 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. Of the 85 allegations recorded during Q3 2025/26 the highest number were in the categories of: Police action following contact (18) General level of service (8) Information (7) Use of Force (6) Handling/damage to Property (5) Impolite language and Tone (5).
24. Preparation for a HMICFRS Integrity inspection is a key focus area for the department. Robust governance is in place to track performance and progress against the Readiness Assessment recommendations.

Report Authors

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Appendices - Public

Appendix 1 - Gifts and hospitality register

Appendix 2 - Chief Officers Register of group memberships

Appendices - Non-Public

Appendix 3 - Officers Suspended/Restricted (**NON-PUBLIC**)

Glossary

Terminology

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Item Type	Hospitality Item	Location type	Directorate	Date	Estimated Value	CoLP Participant(s)	External Organisation	Full description of Gift/Hospitality	Location details	Rationale
Gift Item	M&S hamper	Emergency Services Premises	Specialist Operations	17/12/2025	50	Dominic Lawson	Will Stranders, Stranders Electrical	CID B TABLE have been given an M&S hamper from Will Stranders who is the victim party in crime 25****. Will is a contractor in Bishopsgate and his tools (£4-5k worth) were stolen when the Police Station was burgled. The tool bags and boxes had air tags in them and the tools were discovered in a flat and one of the two suspects arrested. He has given this hamper to us as a thank you.	CID Office	Will Stranders has given B TABLE this hamper as a thank you for recovering all of his tools.
Hospitality Item	Evening reception to celebrate Chanukah	Guildhall/Mansion House	Chief Officer Team	16/12/2025	75	Pete O'Doherty	City of London Corporation	For the attention of Commissioner Pete O'Doherty The City of London Corporation requests the pleasure of your company at an Early evening reception to celebrate Chanukah Tuesday 16th December 2025 from 6.00 pm to 8.00 pm Old Library, Guildhall, London EC2V 5AE	Guildhall	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	Crime Reporters Association 80th Anniversary Celebration	Bar/Pub	Chief Officer Team	11/12/2025	50	Pete O'Doherty	Crime Reporters Association	The Crime Reporters Association invites you to attend our 80th anniversary celebration at The Devereux pub in Temple on Thursday, December 11 at 6pm. This year we have a lot to celebrate, the CRA has worked hard to improve relations between police and the media, helping to draft new guidelines on how we can work better together and this year we are celebrating our 80th year. Please can you share this invite with the Commissioner and of course the press team. We look forward to seeing you there, Rebecca Camber Chair of the Crime Reporters Association	The Devereux Public House	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	Centre for Finance & Security Annual Festive Drinks	Office premises (external organisation)	Chief Officer Team	11/12/2025	50	Pete O'Doherty	Centre for Finance & Security	The Centre for Finance and Security (CFS) is delighted to invite you to our annual festive drinks, taking place at our home at 61 Whitehall on 11.12.2025 from 17:30 GMT.	CFS Offices, 61 Whitehall	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments

Hospitality Item	Evening Presentation and Reception with the Patchwork Foundation 2025 Masterclass Graduates	Guildhall/Mansion House	Chief Officer Team	10/12/2025	75	Pete O'Doherty	City of London Corporation	The City of London Corporation invites you to an Evening Presentation and Reception with the Patchwork Foundation 2025 Masterclass Graduates Wednesday 10th December 2025 from 5.45 pm - 8.00 pm Livery Hall, Guildhall, London EC2V 5DH	Livery Hall, Guildhall	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	British Police Symphony Orchestr - Frost and Flames: A Symphony of Elements	Museum/Gallery/Cultural	Chief Officer Team	06/12/2025	50	Pete O'Doherty	British Police Symphony Orchestra	British Police Symphony Orchestra Proms Night Spectacular Saturday 6th December 2025 – Birmingham Symphony Hall Your VIP Invitation to “Frost and Flames: A Symphony of Elements” Proms Night Spectacular with the British Police Symphony Orchestra	Birmingham Symphony Hall	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	British Police Symphony Orchestra - Frost & Flames: A Symphony of Elements	Museum/Gallery/Cultural	Chief Officer Team	06/12/2025	50	Nik Adams	British Police Symphony Orchestra	British Police Symphony Orchestra Proms Night Spectacular Saturday 6th December 2025 – Birmingham Symphony Hall Your VIP Invitation to “Frost and Flames: A Symphony of Elements” Proms Night Spectacular with the British Police Symphony Orchestra	Birmingham Symphony Hall	Offered as part of Deputy Cmsr's role to attend events and functions. Accepted as Dep Cmsr is a trustee of the BPSO
Hospitality Item	London Fire Brigade Carol Service	Museum/Gallery/Cultural	Chief Officer Team	04/12/2025	0	Pete O'Doherty	London Fire Brigade	On behalf of London Fire Commissioner Jonathan Smith, you are invited to London Fire Brigade's Carol Service. Date: Thursday, 4 December 2025 Time: 7pm (guests to be seated by 6.45pm) Venue: St Paul's Cathedral, St Paul's Churchyard, London EC4M 8AD	St Paul's Cathedral	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments

Hospitality Item	Reception & Banquet in honour of His Excellency The President of the Federal Republic of Germany	Guildhall/Mansion House	Chief Officer Team	04/12/2025	100	Pete O'Doherty	City of London Corporation	The City of London Corporation requests the pleasure of the company of Commissioner Pete O'Doherty and Guest at a Reception and Banquet in honour of His Excellency The President of the Federal Republic of Germany and Mrs. Elke Büdenbender Guildhall, Thursday 4th December 2025 from 7.00 to 11.00 pm	Guildhall	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	Metropolitan & City Police Orphans Fund Annual Luncheon	Museum/Gallery/Cultural	Chief Officer Team	03/12/2025	100	Pete O'Doherty	Metropolitan & City Police Orphans Fund	The Board of Management will be hosting a 'Luncheon', which will be sponsored by our Insurer's at the Royal Automobile Club, Pall Mall on Wednesday 3rd December 2025 at 12.30pm for 1pm.	Royal Automobile Club	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	Be Inspired - Despite Everything: Finding Purpose Exhibition	Museum/Gallery/Cultural	Chief Officer Team	27/11/2025	0	Pete O'Doherty	Be Inspired	Be Inspired Despite Everything: Finding Purpose Exhibition Thursday 27/11/2025 1700-2100hrs Photofusion Gallery, Unit 2, 2 Beehive Place, London SW9 7QR	Photofusion Gallery, Unit 2, 2 Beehive Place, London SW9 7QR	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	Invite to Assurant Insights Event	Bar/Pub	National Lead Force Operations	27/11/2025	172	Simon Klust	Elliot Gradwell - Assurant	Assurant are a mobile phone insurer and IFED have been invited to speak at the event. The event does include a meal which is estimated to cost £170 per head.	Ren Room Shard	IFED are close partners with the insurance industry and often speak at events to give a counter fraud message.
Hospitality Item	High Commissioners' Banquet	Guildhall/Mansion House	Chief Officer Team	25/11/2025	100	Pete O'Doherty	City of London Corporation	The City of London Corporation and the Royal Commonwealth Society, in association with the Commonwealth Enterprise and Investment Council, request the pleasure of the company of Commissioner Pete O'Doherty at the High Commissioners' Banquet Tuesday 25th November 2025 at 6.00 pm for 6.45 pm Mansion House, London EC4N 8BH	Mansion House	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	Complimentary partner ticket to Conference	Office premises (external organisation)	National Lead Force Operations	18/11/2025	120	Richard Sinclair	UCL and Saferbusiness.org.uk	Complementary partner ticket to 16th International Crime Conference	University College London, 183 Euston Road, London	UCL are London Cyber Resilience Centre Community Ambassador partner. National CRC Group recruit, via CRCL students

										onto Cyber PATH. Invite following Cyber path recruitment campaign. Cross-Government attendance includes Home Office.
Hospitality Item	Invitation to evening reception	Office premises (external organisation)	National Lead Force Operations	18/11/2025	27	Richard Morrison-Butcher	LCCL and Mosimann's	London Chamber of Commerce and Industry Business Crime-focus event	Mosimann's, 11B West Halkin Street, London SW1	London Chamber of Commerce and Industry are key stakeholder to reach businesses to deliver Cyber Security Services (London CRC, Cyber PATH). Regioanal business networking event. Complimentary ticket.
Page 106 Hospitality Item	UK Finance Annual Dinner	Guildhall/Mansion House	Chief Officer Team	18/11/2025	100	Pete O'Doherty	UK Finance	<p>I'm delighted to invite you as my guest to this year's UK Finance Annual Dinner, held in association with EY.</p> <p>This high-profile event brings together over 500 senior figures from across financial services, government, regulators and wider stakeholders. It's a fantastic opportunity to connect with peers, build new relationships, and enjoy a memorable evening in a historic and unique setting – alongside insights from senior industry speakers.</p> <ul style="list-style-type: none"> • Date: Tuesday 18 November 2025 • Time: 18:00 – 22:00 • Venue: Guildhall, Gresham Street, London, EC2V 7HH 	Guildhall	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	Celebrating 40 years of the AFP London Liaison Post	Government premises	Chief Officer Team	13/11/2025	50	Pete O'Doherty	Australian Federal Police (AFP)	The Australian Federal Police in London request the pleasure of the company of Peter O'Doherty at our Annual Liaison Function to acknowledge and express our gratitude for your continued support, and to celebrate 40 years of the AFP London Liaison Post. Thursday 13 November 2025 6:00pm – 8:00pm Australian High Commission, Australia House, Strand, London, WC2B 4LA	Australian High Commission, Australia House, Strand, London, WC2B 4LA	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	The ABI 40th Anniversary Annual Dinner	Museum/Gallery/Cultural	Chief Officer Team	13/11/2025	100	Tor Garnett	The ABI	You are invited to our Annual Dinner 2025, sponsored by KPMG, on Thursday 13 November 2025, at Lindley Hall, London. Timings: 18:00 - 22:00 Dress code: Business attire	Royal Horticultural Halls, SW1P 2PB	Offered as part of Cmsdr's role to attend events and functions. Declined due to prior commitments

Hospitality Item	The ABI 40th Anniversary Annual Dinner	Museum/Gallery/Cultural	Chief Officer Team	13/11/2025	100	Nik Adams	The ABI	You are invited to our Annual Dinner 2025, sponsored by KPMG, on Thursday 13 November 2025, at Lindley Hall, London. Timings: 18:00 - 22:00 Dress code: Business attire	Lindley Hall	Offered as part of Deputy Cmsr's role to attend events and functions. Accepted
	Swiss Peaks Umbrella	Government premises	Specialist Operations	13/11/2025	14	Kev Hughes	Cellebrite	Swiss Peaks Umbrella sent via recorded delivery	Sent by recorded delivery to BGATE PPSTATION	
Hospitality Item	Invitation to conference reception.	Hotel	National Lead Force Operations	13/11/2025	50	Richard Morrison-Butcher	PAXIdentity	Inaugral Enterprise Idnetity Forum organised by PAXIdentity. 1600-2100 with post event networking drinks	Rosewood London, 252 High Holborn WC1V 7EN	Strategic/Tactical stakeholder building/networking for Cyber Resilience Centre for London (elevant Cyber Security topic for SMEs).
Hospitality Item	The Gresham Dinner - Mercers' Hall	Museum/Gallery/Cultural	Chief Officer Team	11/11/2025	100	Pete O'Doherty	The Mercers' Company	The Master and Wardens request the pleasure of your company, at the Gresham Dinner, to be held at Mercers' Hall on Tuesday 11th November 2025 at 7 for 7.30 pm. Please note that Dress Code will be White Tie with Decorations.	Mercers' Hall	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	Champagne Reception following return procession at the Lord Mayors Show	Guildhall/Mansion House	Chief Officer Team	08/11/2025	50	Pete O'Doherty	City of London Corporation	Caroline Jack Executive Director and Private Secretary to Lord Mayor Would like to invite you and your guest to a champagne reception at The Mansion House, Walbrook EC4M 8BH on Saturday 8th November 2025 following the return procession at The Lord Mayors Show	Mansion House	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	Dinner in honour of the immediate Past Chair Deputy Dawn Wright	Livery Hall	Chief Officer Team	04/11/2025	100	Pete O'Doherty	City of London Corporation	James Tumbridge, CCChairman of the Digital Services Committeeof the City of London Corporationrequests the pleasure of the company ofCommissioner Pete O'Dohertyat a Dinnerin honour of the Immediate Past ChairDeputy Dawn WrightTuesday 4th November 2025 at 6.30 pm for 7.00 pmIronmongers' Hall, London EC2Y 8AA	Ironmonger's Hall EC2Y 8AA	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments

Hospitality Item	Crimestoppers Annual Dinner	Office premises (external organisation)	Chief Officer Team	04/11/2025	100	Pete O'Doherty	Crimestoppers	Crimestoppers Annual Dinner will be held on Tuesday 4th November from 6.45-10pm at One Great George Street, Westminster SW1P 3AA.	One Great George Street, Westminster SW1P 3AA	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	Lord Mayors Show Floatholder Reception	Civic building	Specialist Operations	03/11/2025	20	Eleanor Gill	Lord Mayor (City of London Corporation) Dominic Reid OBE Pageantmaster	<p>Reception at Mansion House on Tuesday 11 March 2025</p> <p>An invitation from the Rt. Hon. The Lord Mayor of London and The Lady Mayoress to a reception at Mansion House on Tuesday 11 March 2025 from 1730-1930.</p> <p>This is being held for participants in the 2024 Lord Mayor's Show, together with a few selected organisations who may wish to take part in November 2025, and offers an opportunity for the Lord Mayor to thank those of you who supported his Show. You will also be able to meet Alderwoman Dame Susan Langley DBE, to hear briefly about her plans for 2025/26. It will be twelve years since the last female incumbent and Dame Susan will be the first to be styled Lady Mayor for the year 2025/26.</p>	Mansion House	I was assistant lead floatholder for the City of London Police cadets float which was at the Lord Mayors Show in November 2024
	Gift Item	Discount	Office premises (external organisation)	Local Policing	31/10/2025	20	David Baker	The owner of DPUS OUTLET Brick Lane (I think the name of the male was Rich)	After attending a sale event in Brick Lane, the owner gave me a 20% discount on a already heavily discounted jumper after speaking to a group who were being rather unpleasant to his wife who manages the shop next door.	DPUS Store Brick Lane - Shop more than a premises.

Hospitality Item	Lighting Up Dinner	Guildhall/Mansion House	Chief Officer Team	28/10/2025	100	Pete O'Doherty	City of London Corporation	To meet the Lady Mayor Elect and the Sheriffs The Chair, Deputy Andrien Meyers and the members of the Lady Mayor and Sheriffs' Committee request the pleasure of the company of Commissioner Pete O'Doherty at the Lighting Up Dinner Crypts, Guildhall, London EC2V 5AE Tuesday 28th October 2025 at 7.00 for 7.30 pm	Guildhall	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	The City of London Police Federation Rupert Fund 50th Anniversary	Guildhall/Mansion House	Chief Officer Team	26/10/2025	100	Pete O'Doherty	The City of London Police Federation Rupert Fund	The City of London Police Federation Rupert Fund 50th Anniversary Guildhall Sunday 26/10/2025 1845hrs - 0000hrs	Guildhall	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	Royal Regiment of Fusiliers - City Luncheon	Museum/Gallery/Cultural	Chief Officer Team	24/10/2025	75	Pete O'Doherty	The Royal Regiment of Fusiliers	City Luncheon	HM Tower of London	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Hospitality Item	The City Regulator's Dinner 2025	Guildhall/Mansion House	Chief Officer Team	22/10/2025	75	Pete O'Doherty	City of London Corporation	City Regulator's Dinner 2025 Wednesday 22/10/2025 at 190hrs Mansion House	Mansion House	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments
Page 109	Lunch with Asset Reality	Restaurant	National Lead Force Operations	22/10/2025	60	Martin Peters	Asset Reality	After a presentation to the National Financial Crime Unit for Malaysia with Asset Reality, I (Martin Peters) was offered a lunch with Paul Izzei from Asset Reality to discuss the work already in place and contracted with Asset Reality to speak about planning the work that will be undertaken in the consultancy contract (signed by Doug Ing previously). I had a lamb salad and brownie dessert, coffee at the Natural Kitchen in Angel Court, value approx £60. This occurred on 22/10/2025	Natural Kitchen, Angel Court, London	
	Gift Item	A5 lined notebook	Chief Officer Team	21/10/2025	10	Umer Khan	Bank of America	A5 lined notebook received by Cmdr Khan from Bank of America Senior Vice President.	N/A - handed to Cmdr Khan in GYE reception	Offered as a small thank you for the ongoing working relationship with BoA. To decline would be seen to cause offence.
Hospitality Item	Lord Mayor's Annual Defence & Security Lecture	Guildhall/Mansion House	Chief Officer Team	20/10/2025	0	Pete O'Doherty	City of London Corporation	Lord Mayor's Annual Defence & Security Lecture Mansion House 20/10/2025 1815-2000hrs	Mansion House	Offered as part of Cmsr's role to attend events and functions. Declined due to prior commitments

	Tackling Economic Crime Awards (TECA)	Hotel	National Lead Force Operations	20/10/2025	600	Martin Peters	Asset Reality	Conference sponsor Asset Reality has offered 3 spaces (est price for ticket £200 ea and 3 offered) on their table for the TECA to support the awards across the industry and law enforcement on Tuesday 03/11/2025	Royal Lancaster Hotel, London	
Hospitality Item	The Lord Mayor Alderman Alistair King's visit to Smithfield Market	Civic building	Chief Officer Team	16/10/2025	25	Pete O'Doherty	Smithfield Market Tenants' Association	<p>Greg Lawrence Chairman of Smithfield Market Tenants' Association requests the pleasure of your company at breakfast on</p> <p>Thursday 16th October 2025</p> <p>when the SMTA will be entertaining</p> <p>The Rt Hon The Lord Mayor Alderman Alastair King</p> <p>on the occasion of his visit to Smithfield Market</p> <p>You are invited to join us from 7.15am for coffee in the reception area of Butchers' Hall, Bartholomew Close, London EC1A 7EB, followed by breakfast. We ask that you arrive no later than 7.30am.</p>	Butcher's Hall, EC1A 7EB	Offered as part of Cmsr's role to attend events and functions. Declined due to leave.
Hospitality Item	Resilience threat conference and evening reception (food and drinks)	Livery Hall	National Lead Force Operations	16/10/2025	50	Richard Morrison-Butcher	SERCO and The London Resilience Forum	London Resilience Forum Autumn Reception (no cost to members - CoLP member).	Army & Navy Club (36-39 Pall Mall)	Attended as incoming London Cyber Resilience Centre lead to build strategic connections and understand cyber resilience perspectives
Hospitality Item	Team Police annual reception	Office premises (external organisation)	Corporate Services	15/10/2025	25	Carly Humphreys	Team Police (fundraising arm for PSUK)	This is an annual reception held at Salesforce Tower which includes inputs around Police Sport and Wellbeing for Police employees.	Salesforce Tower	This involves a drinks reception and buffet. As a Police Sport UK Board of Director and Assistant Manager for GB Police Women's Football team, I was invited to this event as a PSUK representative to engage with attendees around police sport events.
Gift Item	Box of Chocolates	Emergency Services Premises	Specialist Operations	10/10/2025	10.46	Raeven Headlam	Vixtim - 25*534170	Box of Chocolates given to me by the victim - estimated price is 13.95 dollars as guessed from a google search which is approximatley £10.46	Bishopsgate Police Station	Victim for a serious DA has stated she wanted to give them to me as a thanks for listening and supporting her. I tried to politely decline but this was making her more upset and so I took them to show my gratitude for her being kind but reassured her there was no need to thank me

Gift Item	Numerous boxes of dates	Foreign location	Chief Officer Team	10/10/2025	25	Umer Khan	Saudi Data & AI Authority - Kingdom of Saudi Arabia	Following a working trip to Saudi Arabia, Cmdr Khan and Commissioner O'Doherty received numerous boxes of dates as a thank you from the Saudi delegation.	Saudi Arabia - precise location unknown.	Cmdr Khan and Commissioner O'Doherty to visiting a Saudi delegation and shown great hospitality, to decline would be to offend.
Hospitality Item	Thank You Reception with Lady Mayoress Florence King	Guildhall/Mansion House	Chief Officer Team	09/10/2025	25	Pete O'Doherty	Office for Lady Mayoress Florence King	Thursday 9th October 2025 1700-1900hrs Mansion House	Mansion House	Offered as part of Cmsr's role to attend events and functions. Declined due to trip to KSA
Gift Item	Various ornamental personalised gifts from Saudi	Foreign location	Chief Officer Team	08/10/2025	0	Pete O'Doherty	Various KSA authorities	Various ornamental personalised gifts from Saudi Arabia during CoLP visit.	Saudi Arabia	Accepted as to refuse would cause offence. Unable to quantify cost of items presented
Hospitality Item	Early evening reception for the Central London Bench	Government premises	Chief Officer Team	07/10/2025	25	Pete O'Doherty	City of London Corporation	Tuesday 7th October 2025 1800-1930hrs Central Criminal Court, Old Bailey EC4M 7EH	Central Criminal Court, Old Bailey EC4M 7EH	Offered as part of Cmsr's role to attend events and functions. Declined due to other commitments (trip to KSA)
Hospitality Item	Reception to Celebrate Black History Month	Guildhall/Mansion House	Chief Officer Team	03/10/2025	25	Pete O'Doherty	City of London Corporation	Friday 03 October 2025 1830-2100hrs Old Library, Guildhall	Guildhall	Offered as part of Cmsr's role to attend events and functions. Declined due to attending another event
Hospitality Item	Attending an awards ceremony	Civic building	National Lead Force Operations	02/10/2025	150	Nik Jethwa	Organised by the Insurance Post	CoLP/IFED have been invited to the Annual Fraud Awards. IFED attend each year to support industry partners. The table has been booked by Insurance Fraud bureau, a non for profit organisation who work closely with IFED and policing.	The Brewery, Chiswell Street, London, EC1Y 4SD	To decline would adversely impact on IFED's/CoLP's relationship with the insurance industry and key stakeholders. I have considered the GIFT acronym prior to accepting.

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Appendix 2 - PUBLIC

Chief Officer Team (COT) Membership of Groups

Quarter 3

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>Ref no</u>	<u>Date logged</u>	<u>Rank</u>	<u>Officer declaring</u>	<u>External Organisation</u>	<u>Role/Position held</u>
1	18/11/2023	Temp Commander / DCS	Oliver Shaw	Fraud Advisory Panel (FAP)	Sit on the board of Trustees as CoLP's representative (FAP is a registered charity)
2	18/11/2023	Temp Commander / DCS	Oliver Shaw	Paddington Farm Trust (PFT).	Sit on the board of Trustees (PFT is a registered charity)
6	18/01/2024	Deputy Commissioner	Nik Adams	National Cyber Resilience Centre Group and London Cyber Resilience Centre	Non-Exec Director
7	17/05/2024	Commissioner	Pete O'Doherty	National Cyber Resilience Centre Group	Non-Exec Director
8	17/05/2024	Commissioner	Pete O'Doherty	Worshipful Company of Security Professionals Honorary Freeman	Member
9	17/05/2024	Commissioner	Pete O'Doherty	Abertay cyber Quarter, Abertay University	Advisor

10	17/05/2024	Commissioner	Pete O'Doherty	Royal Humane Society	Panel Member
11	10/09/2024	Chief Operating Officer	Alix Newbold	Negative / No Organisations	N/A
12	10/09/2024	Chief Finance Officer	Alistair Cook	School	Parent Governor
13	10/09/2024	Chief Finance Officer	Alistair Cook	Bursary Trust	Governor
14	10/09/2024	Chief Finance Officer	Alistair Cook	Church	Trustee and Treasurer
15	10/09/2024	Service Delivery Director	Chris Bell	National Cyber Resilience Centre Group	Non-Exec Director
16	10/09/2024	Deputy Commissioner	Paul Betts	Negative / No Organisations	N/A
17	10/09/2024	Commander	Umer Khan	Negative / No Organisations	N/A
18	27/08/2025	Commander	Tor Garnett	Negative / No Organisations	N/A

City of London Corporation Committee Report

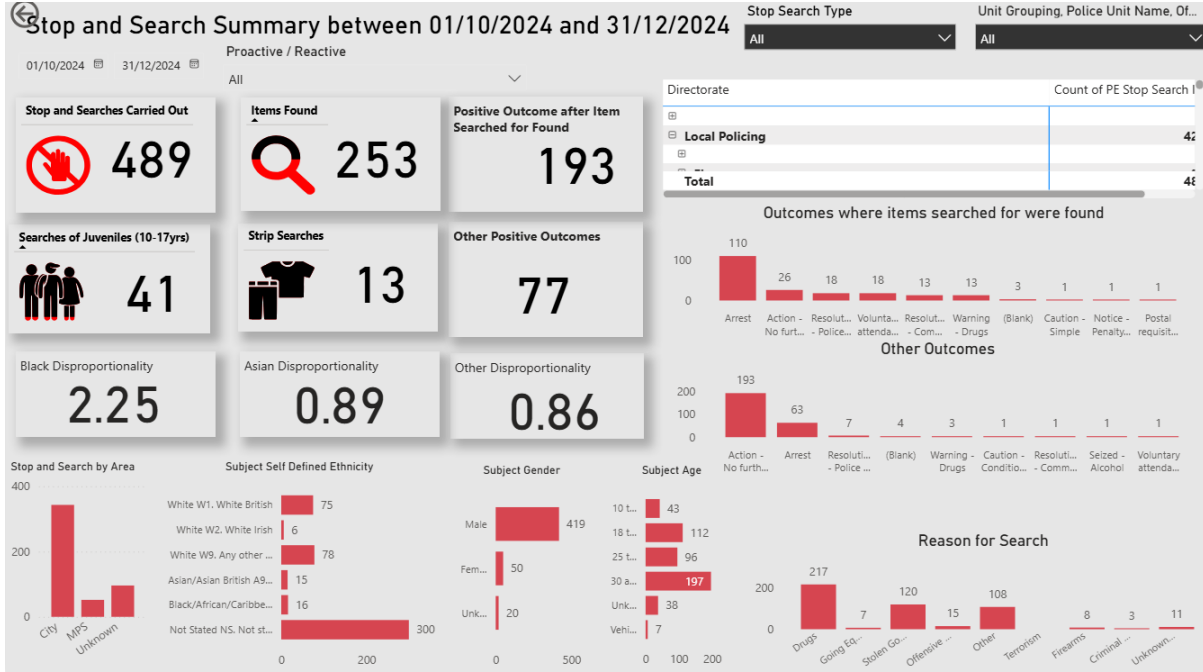
Committee(s): Professionalism and Trust Committee - For information	Dated: 02/02/2026
Subject: Stop & Search and Use of Force Quarter 3 Update and 2024/2025 Annual Comparisons	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides statutory duties 	Diverse Engaged Communities 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

Q3 has seen a reduction in stop and search as the force responds to seasonal criminality with the CoLP area. Bag and cycle thefts continue to be more prevalent at this time of the year as well as licensed premises thefts/crime. CoLP ran Operation Tinsel to provide a safer City in the winter season and the full crime statistics are not yet published but are suspected to be favourable.

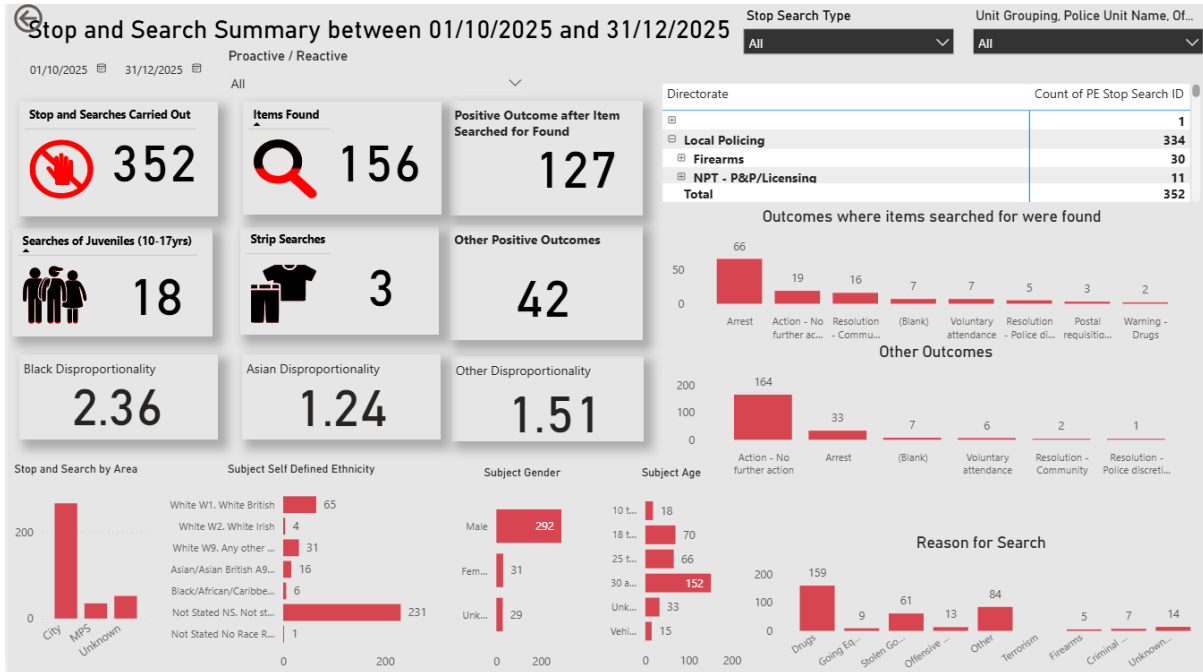
Operations continue in support of Pan London demonstrations as the political situation remains fluid globally. Significant numbers of officers were deployed to Notting Hill carnival at the intervention points which has also increased our stop search figures for the previous quarter, this has affected the annual figures with regards to disproportionality of persons stopped. The figures for Notting Hill Carnival have been included in this report to provide context for the calendar year figures.

Stop and Search

Q3 Results 2024



Q3 results 2025



Total searches ↓ by 137

Search involving youth people ↓ by 23

Outcome rate ↓ by 4.2% (55.2% to 48%)

Disparity rates: Black ↑ by 0.11 Asian ↑ by 0.35 Other ↑ by 0.6

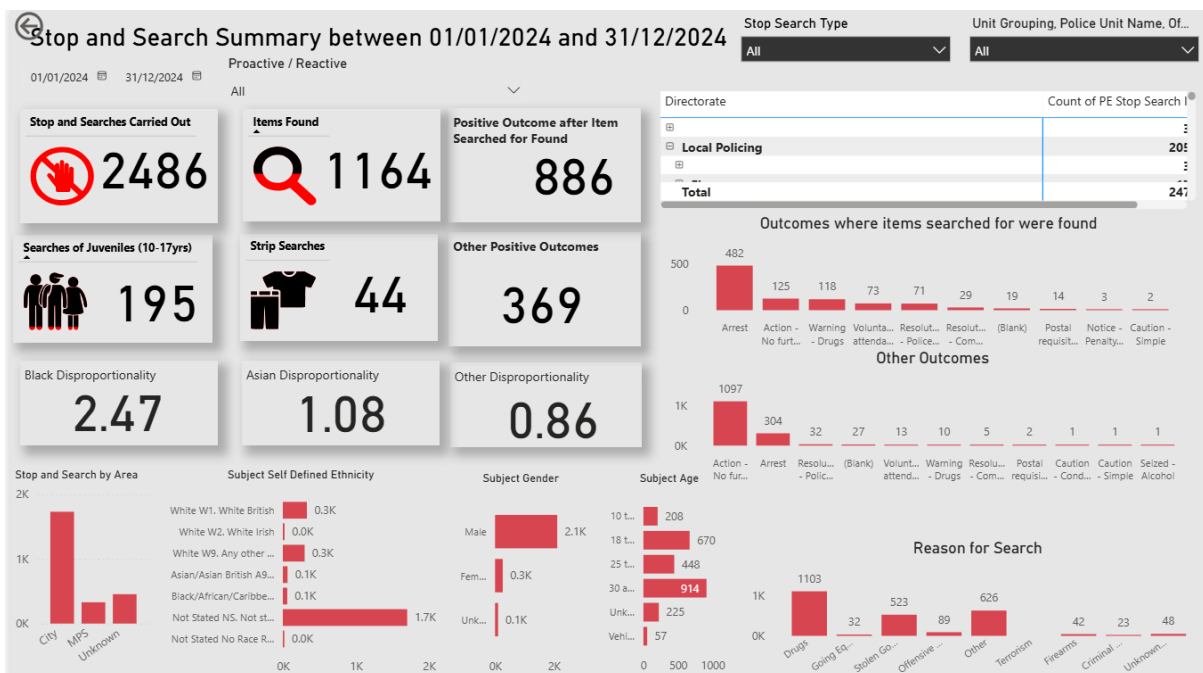
Summary: Overall searches continue to fall, this is overly represented in a larger fall of stop and search within the youth category. This has been a focus of training in the second half of 2025 as CoLP seeks to improve its performance when dealing with suspected youth offenders.

A marginal drop in outcome rates but still very close to the working outcome rate of 50%.

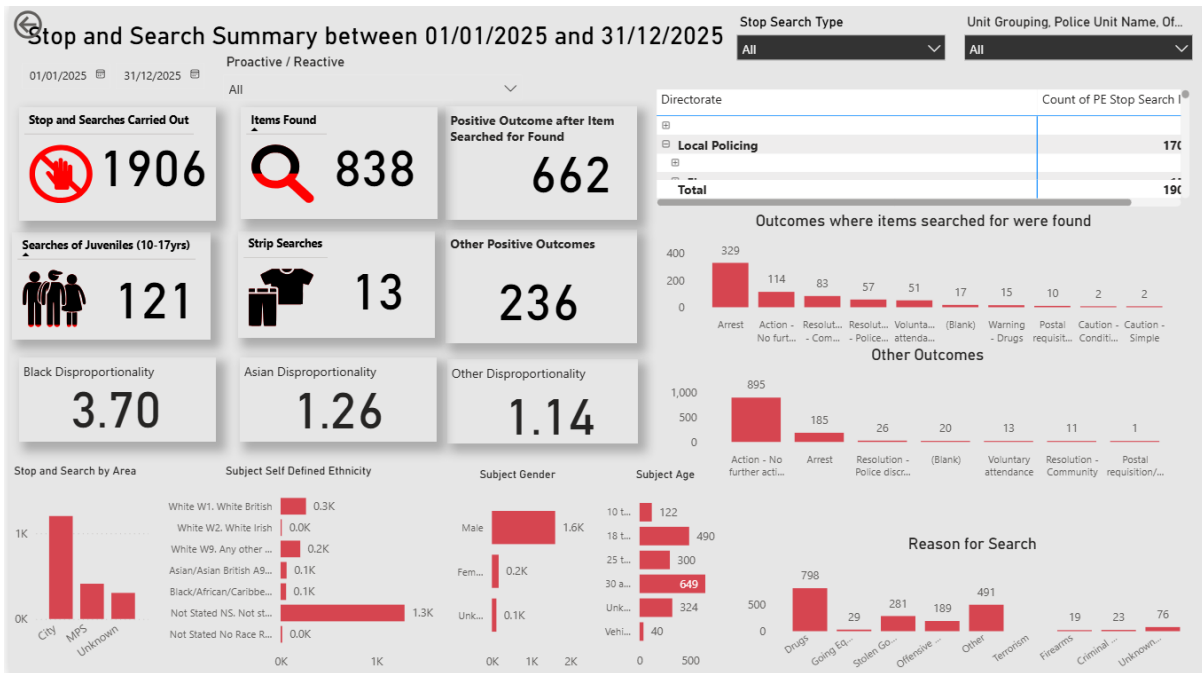
Slight increases in searches on those identified as Black, Asian or other ethnicities, not out of the norm for quarterly variations.

2024 – 2025 comparisons

2024



2025



- Total searches ↓ by 580
- Searches involving youth people ↓ by 74
- Outcome rates ↓ by 3.4% (from 50.5 to 47.1%)
- Disparity rates: Black ↑ by 1.23 Asian ↑ by 0.18 Other ↑ by 0.28

Summary:

Overall searches continue to fall; this is overly represented in a larger fall of stop and search within the youth category. This has been a focus of training in the second half of 2025 as CoLP seeks to improve its performance when dealing with suspected youth offenders.

A marginal drop in outcome rates but still very close to the working outcome rate of 50%.

Slight increases in searches on those identified as Black, Asian or other ethnicities, not out of the norm for quarterly variations.

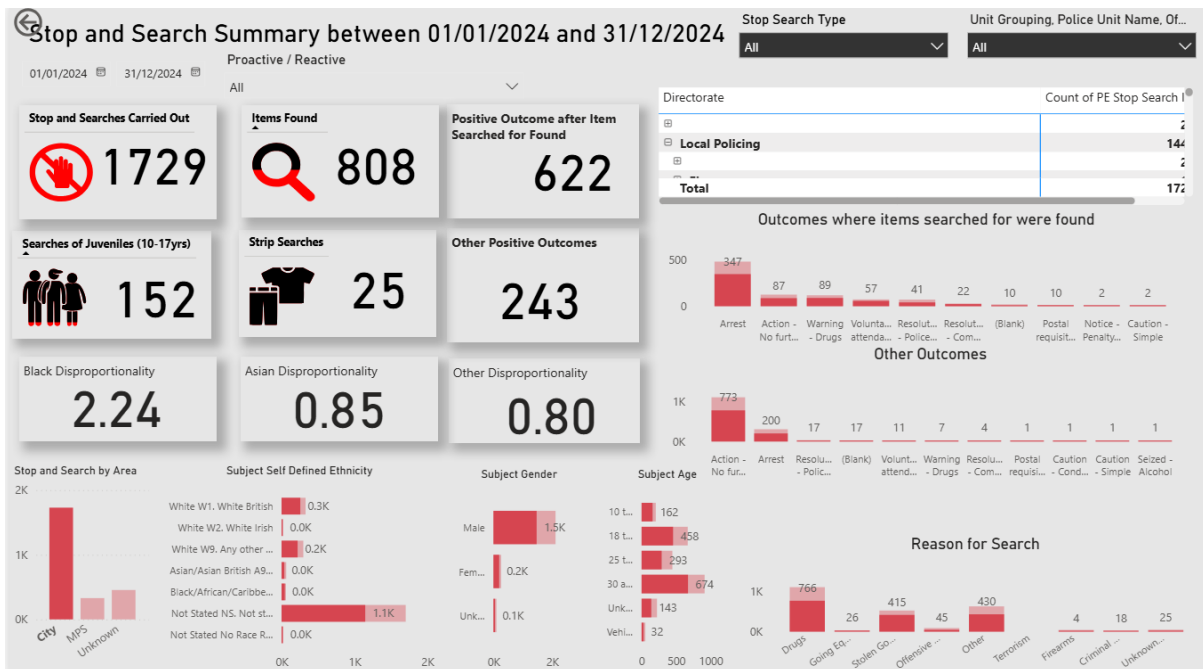
Summary: As seen with the quarterly trends, stop and search numbers continue to fall. However, outcomes rates are only marginally down and still in the 50% region. As a real positive, CoLP continues to search far less young people.

The increase in disproportionality would invite questions regarding the rises, particularly in those that are searched and identified as being black. This is largely down to CoLP assistance at the Notting Hill Carnival where CoLP officers searched 250 persons on the 24th and 25th of August 2025. Those that were stopped and searched were predominantly identified as black, almost all searches were under a Section 60 authorised by the Metropolitan Police.

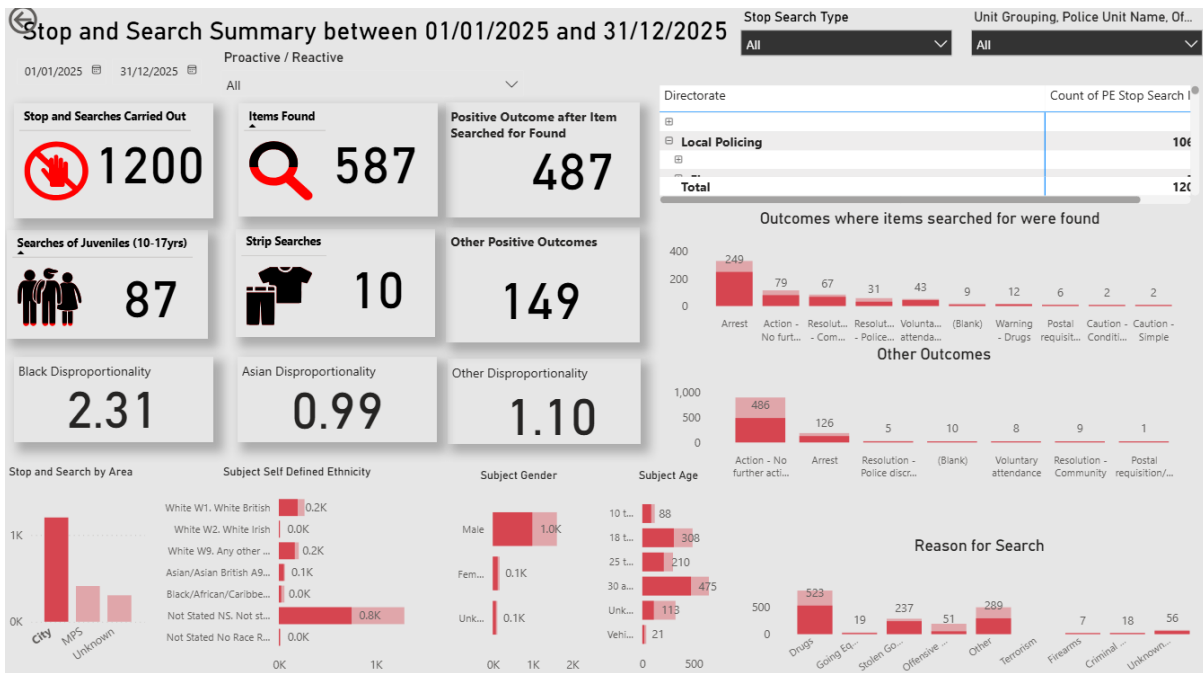
CoLP has looked at the overall figures as it should do following the authorisation of a Section 60. This was part of an incredibly successful operation resulting in the seizure of a number of weapons – more importantly no lives lost at this years event compared to 3 the previous year. This was a strategic decision on tactics used and is Metropolitan Police driven.

Stop and Search within the City only

2024



2025



As a comparator – the overall figures above have removed all of the searches outside the City of London, including the Notting Hill Carnival figures.

Total searches ↓ by 529

Searches involving **youth people** ↓ by 65

Outcome rates ↓ by 3.1% (49.9 to 53%)

Disparity rates: Black ↑ by 0.7 Asian ↑ by 0.14 Other ↑ by 0.30

Disparity rates up by very slight margins.

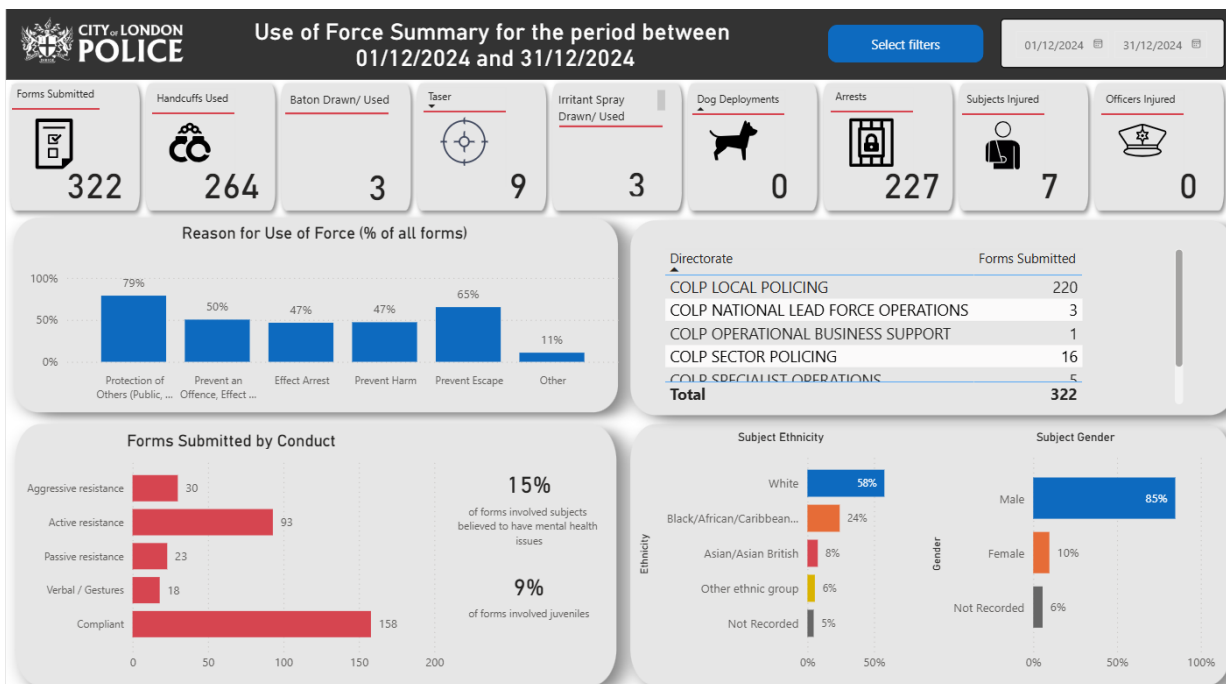
Use of Force

Data issue – coding issues has meant that December 2025 Ude of Force figures are unavailable. The figures for December 2025 have been manually counted:

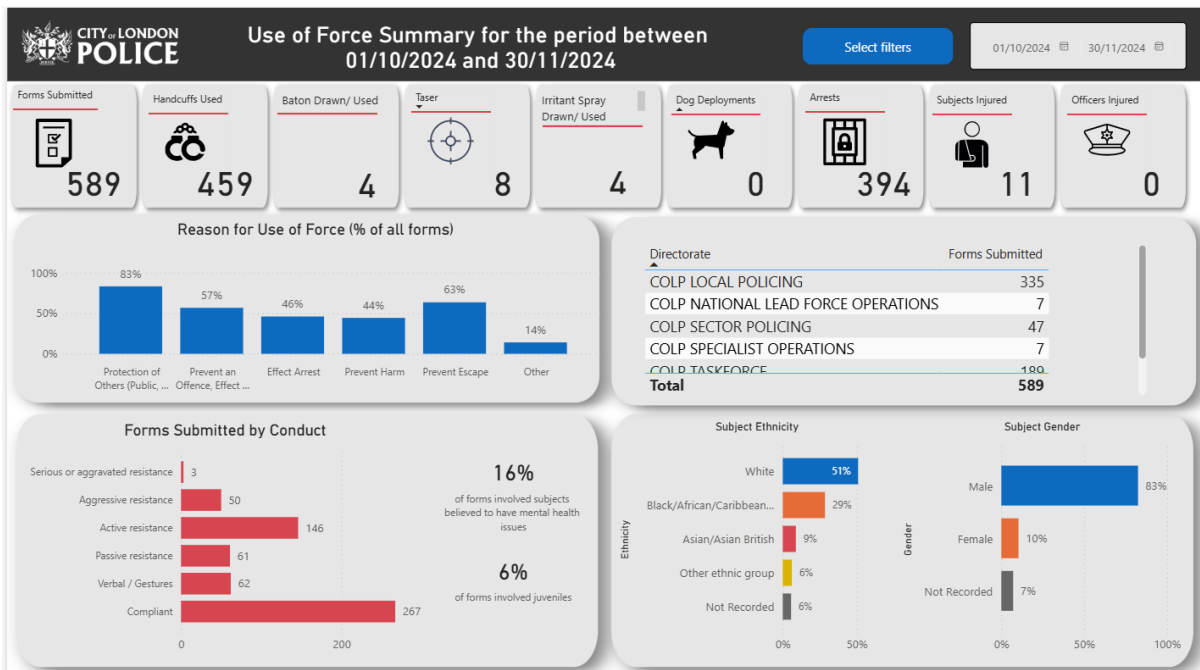
December 2025

<u>Use of Force Summary</u>	<u>Count - Dec 2025</u>
Forms Submitted	242
Handcuffs Used	168
Baton Drawn/Used	3
Taser Dec 2025	3
Irritant Spray Drawn / Used	3
Dog Deployments	0
Arrests	160
Subjects Injured	2
Officers Injured	4

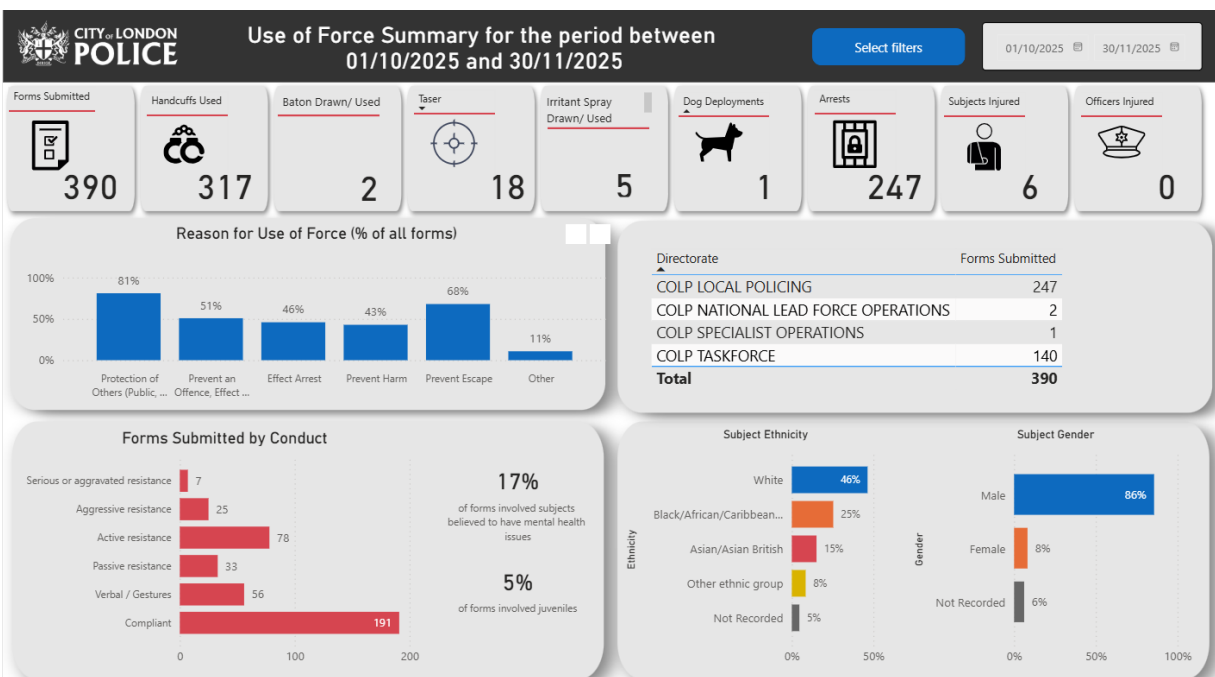
December 2024



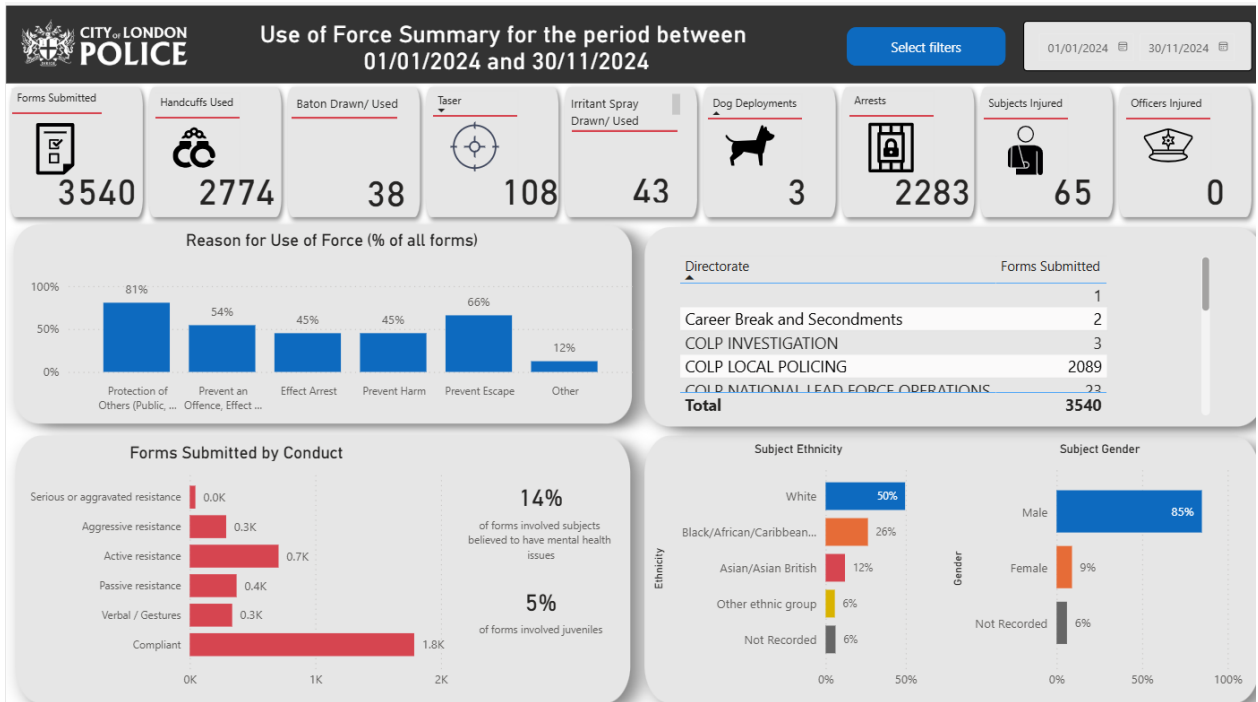
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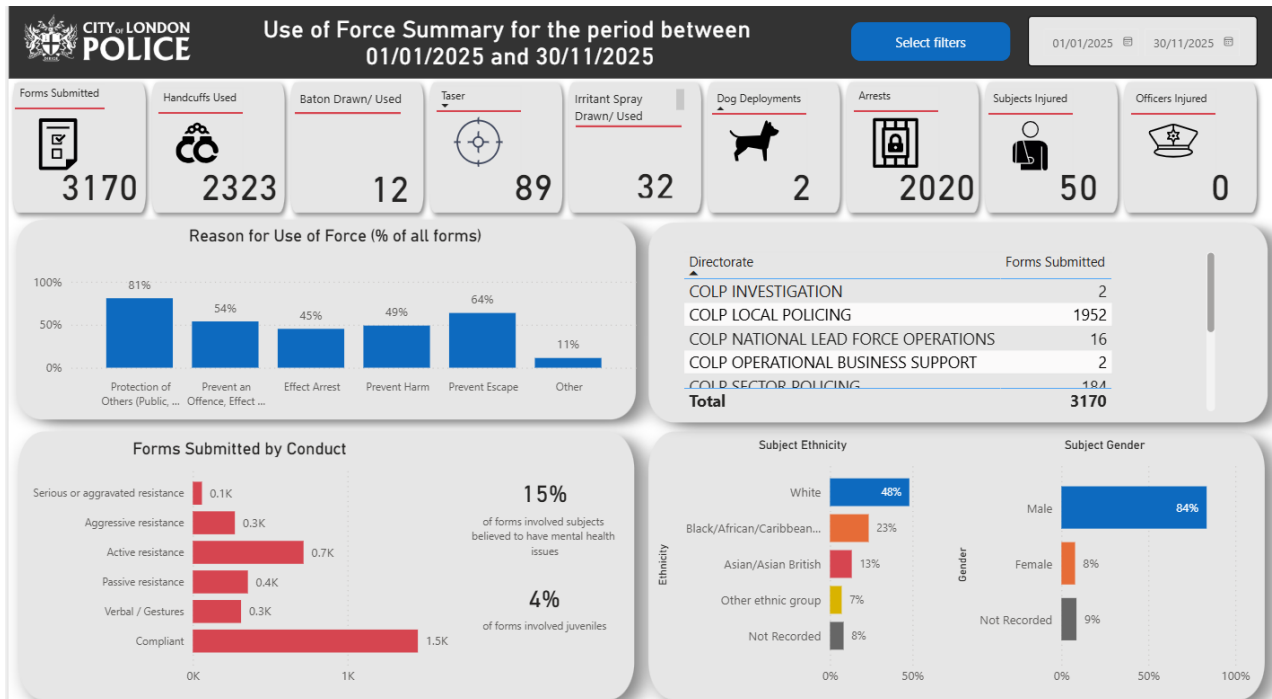
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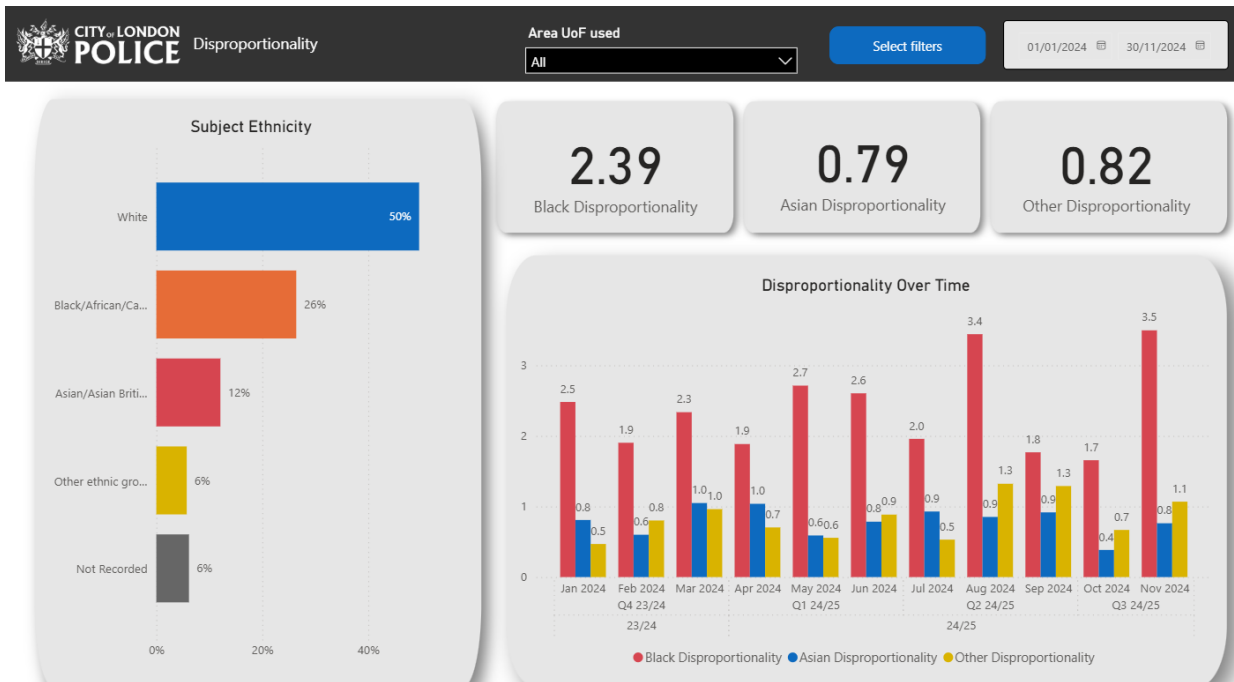
Jan – Nov 2024



Jan – Nov 2025



Use of Force Disproportionality 2024



Use of Force Disproportionality 2025



City of London Corporation Committee Report

Committee(s): Professionalism and Trust Committee	Dated: 02/02/2026
Subject: Annual Custody Update	Public report: For Information
This proposal: <ul style="list-style-type: none"> delivers Corporate Plan 2024-29 outcomes 	Diverse engaged communities, 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?	N/A
Report of:	Commissioner of City of London Police
Report author:	Detective Superintendent Anna Rice, Head of Criminal Justice Services

Summary

The purpose of the report is to provide members with an annual report in relation to custody functions and activities within the City of London over the past 12 months.

The report provides data relating to annual demand, vulnerability data and information on Use of Force, juveniles and strip searching. It also provides updates in relation to custody culture and training.

The report includes an overview and update on some of the measures implemented since the previous HMICFRS inspection in 2019 and ongoing improvement activity and future plans.

Recommendation(s)

Members are asked to note the report.

Main Report

Background

1. At the Police Authority Board meeting in June 2024, it was proposed and agreed that the force would provide an annual report on custody matters. This would specifically include relevant data relating to equality, diversion and inclusion to ensure members had appropriate oversight and is to coincide with the annual Independent Custody Visitor (ICV) report. The force previously provided members with an annual report on custody matters in November 2024.
2. The report covers the period January 2025 to December 2025 and includes relevant data where available.

Current Position

3. Custody Services sit within Criminal Justice Services, Specialist Operations. This dedicated custody cadre is staffed by 15 trained Custody Officers (Sergeants) and 10 Dedicated Detention Officers (police staff) and is overseen by a Custody Management Inspector, supported by a Police Constable.
4. The dedicated Cadre has professionalised the service provided within custody and led to increased focus on supporting vulnerable detainees and young people, the development of an effective performance framework and continuous improvement and training for officers.
5. Following the 2018 HMICFRS custody inspection, 23 areas for improvement were identified. Since this time, significant progress has been made against these outstanding recommendations which have now reduced to one AFI relating to the analysis of custody EDI data, to ensure that outcomes for all detainees are fair. This AFI is close to sign off, as part of a wider force-wide working group to improve the capture and analysis of EDI data.
6. The development of a bespoke Power Bi custody dashboard will support the sign off of this AFI and allow more effective scrutiny of data and disproportionality. This is anticipated to be live in Spring 2026.
7. CoLP did not receive the anticipated HMICFRS custody inspection in 2025. HMICFRS have now ceased this programme of standalone inspections and custody inspections will now form part of the PEEL framework. However, it is possible, given the length of time since the previous inspection, that this may be conducted separately ahead of the next full PEEL inspection. The Custody Management team alongside the Service Improvement team have continued to undertake proactive work to make improvements prior to inspection. This has included reviewing and benchmarking against other force custody inspection

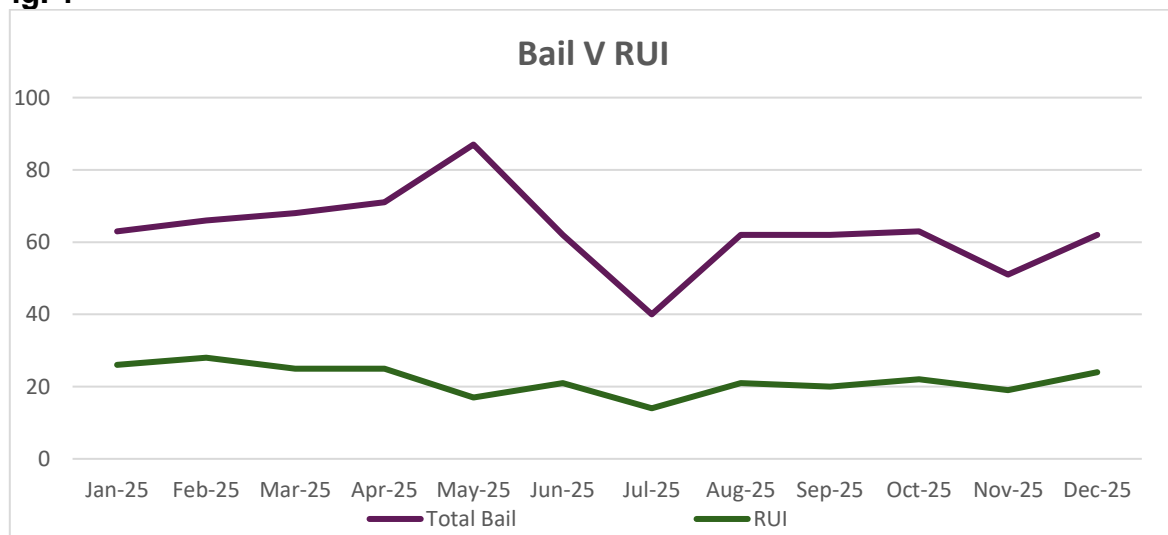
reports, reality testing of custody activities and enhanced qualitative assessment of custody records and CCTV.

8. Following the BBC Panorama Documentary focussing on activities within Charing Cross Custody Suite, CoLP used this as an opportunity to reflect on our practices and the impact and importance of the role and highlight and reinforce our strong positive and professional culture within the Custody team through a range of activities. Whilst the documentary was extremely disturbing and disappointing, CoLP are confident this does not reflect the services or attitudes present within our own custody team.

Overall Custody Demand

9. The total number of detainees held within Bishopsgate Custody in 2025 was 2363. This is a 7% reduction from 2024 calendar year total (2542), however month on month this is relatively consistent, averaging 198 detainees (211 in 2024). **(See Fig 2)**. The reduction in overall custody demand is consistent in the overall YTD reduction in recorded crime for the City of London (6.9% as of 06/01/2026), and an 23% annual increase in the number of voluntary attendance cases. This indicates that officers are utilising alternatives to arrest where possible which is and consistent with PACE and national direction.
10. Bail demand continues to remain high with a low use of Released Under Investigation (70% bail to 30% RUI) consistent with the pattern seen since statutory bail changes in 2022 removed the presumption against bail. **(See Fig 1)**. With the Leveson Criminal Courts Review 2025 recommending either the removal of RUI or placing it on a statutory footing, this will place increased demand in terms of increase bail and RUI management.

Fig. 1



11. CoLP do not have a dedicated bail manager post and as such this has historically led to inconsistencies in driving effective bail and offender management across

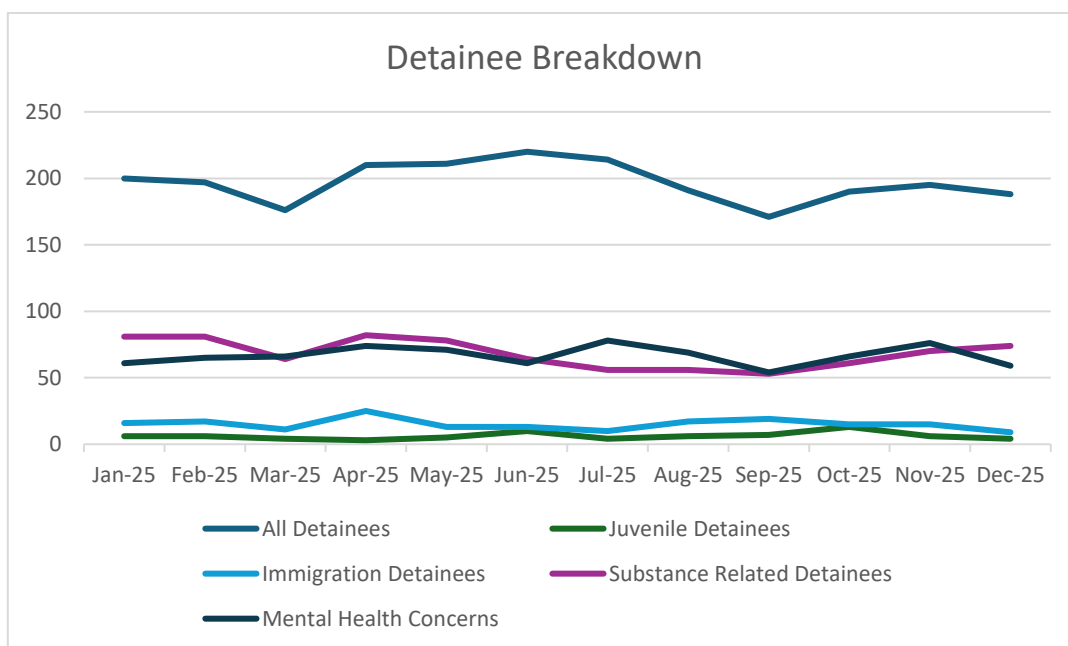
the force and has increased the administrative and procedural burden on the custody staff.

12. To resolve this, a 6-month pilot has been agreed for Spring 2026 to re-introduce the Bail Manager role through re-purposing of a custody sergeant post to dedicate to bail management. The ambition of the dedicated post is to manage the forecasted increase in bail management following the Leveson recommendations and likely increase in offenders in the community due to the national sentencing reviews and prison reform. It will allow focussed support and training for investigators to manage offenders on bail effectively and compliance with legislative timescales, reduce the number of offenders on RUI, or reverting to RUI and relieve the administrative burden on the Custody Officers.

Breakdown of Demand

13. The level of complexities and vulnerabilities of detainees remains broadly consistent, with these detainees placing additional requirements on custody staff. Fig. 2 demonstrates the breakdown of categories of detainees with specific additional needs and vulnerabilities:

Fig. 2.



14. The overall number of juvenile detainees continues to remain consistent and on an average month less than ten juveniles pass through custody. The average age of juvenile detainees in 2026 was 15 years. The youngest detainee was twelve years old.

15. Consistent with 2024 data, over 30% of detainees present with mental health concerns each month and 35% with substance related issues (**Fig 3**) with on average over 50% of detainees being referred to the Healthcare Professional

(HCP) and/or Liaison and Diversion services. (Fig 4 – L&D data not yet available for Dec)

Fig. 3.

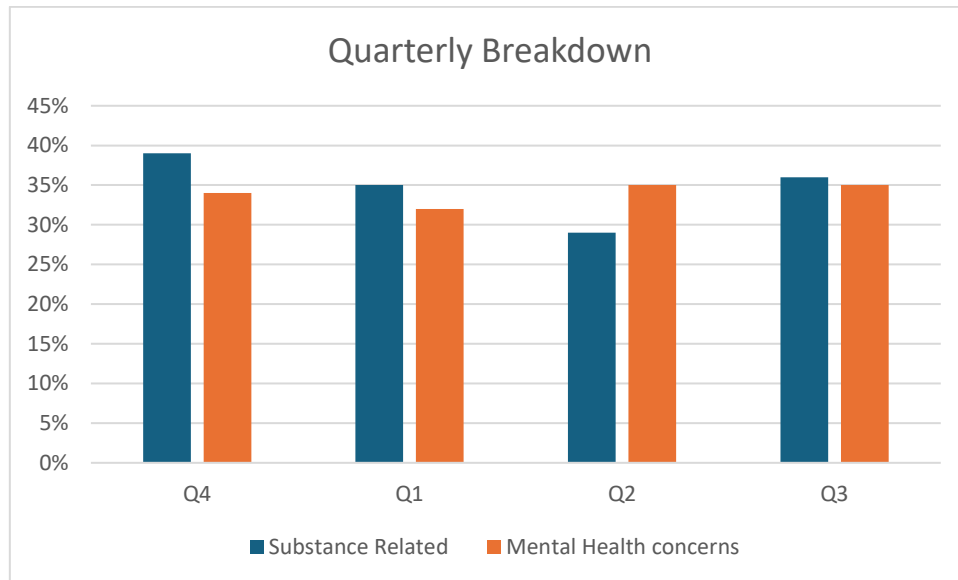
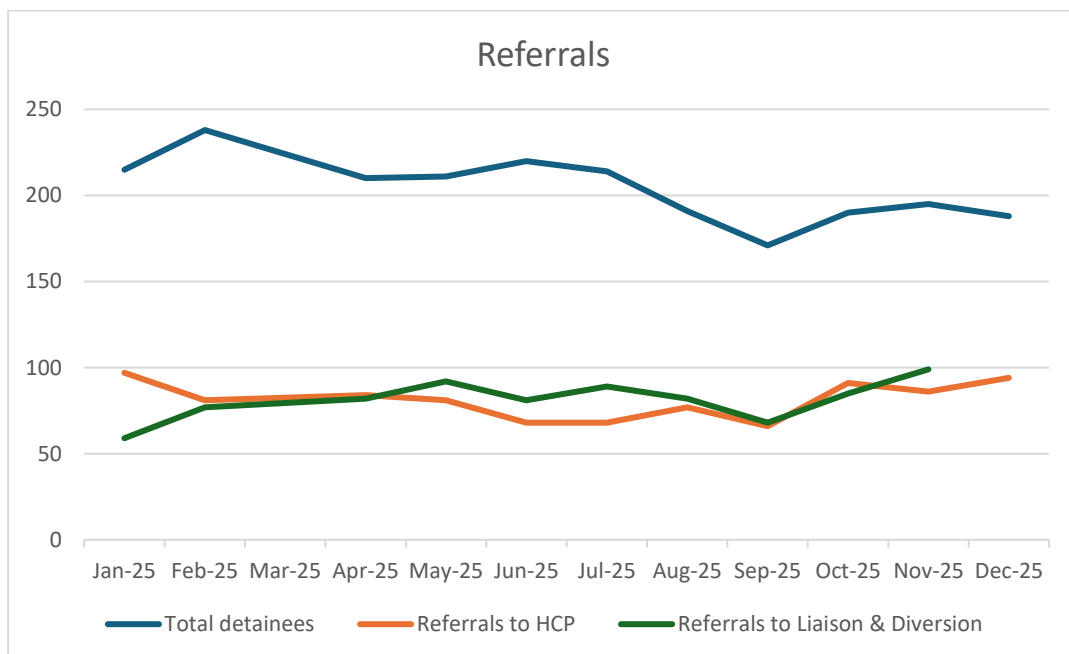


Fig 4.



16. PHL Group are contracted to provide an embedded healthcare service within custody. Detainees have access to this service 24/7 and custody officers are responsible for ensuring they are referred to the HCP (Healthcare Professional) when they present with medical concerns or mental health issues. The PHL contract, which is now in its fourth year, has been extremely successful, with PHL consistently meeting 100% of their Key Performance Indicators.

17. In addition, the East London NHS Trust are commissioned by NHS London to provide the local Liaison and Diversion services for those presenting in custody with mental health concerns. This is not a 24/7 service however email referrals can be made out of hours. The Liaison and Diversion services will assess and refer individuals to appropriate additional support where required. NHS London have recently reviewed provision per custody suite based on demand, which will see coverage for Bishopsgate Custody slightly reduced, but continued to be supported by email referrals.

Vulnerability

18. The custody environment can be an extremely overwhelming place for detainees, and this, coupled with the often chaotic or complex lifestyles of those that are arrested, places some detainees in a vulnerable position.

19. CoLP continues to build on the ongoing work to support vulnerable detainees with embedded Samaritan provision and bespoke referral pathways to support agencies.

20. COLP are further strengthening the response and support for children in custody, developing specific 'child centric' processes which will include bespoke additional reviews for juveniles in custody to reduce the time spent in custody and ensure children and young people are afforded appropriate support and diversion on leaving. This is in line with national work to reduce detention times for children.

21. Although Home Office Funding for Drug Testing on Arrest ceased in 2024, CoLP have been working closely to review the memorandum of understanding with Turning Point to ensure appropriate support is available individuals in custody who have substance misuse problems or test positive on arrest. This increased support should be agreed and embedded by the end of this financial year. To complement this, bespoke pathways are in place with a number of drug and alcohol charities for those seeking support once they leave custody.

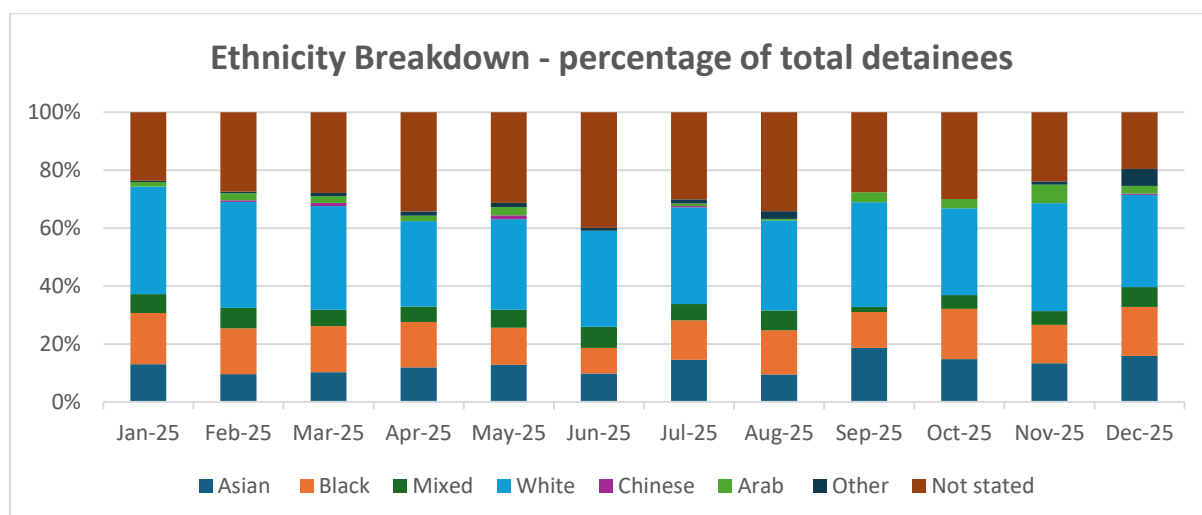
Equality Data and Disproportionality

22. The only outstanding recommendation following the 2018 HMICFRS inspection relates to effective scrutiny of equality data, to ensure the force has effective governance processes in place to review outcomes for those coming through custody and monitor disproportionality.

23. A custody performance dashboard is in place which includes data over a range of metrics extracted from the Niche system. This includes some EDI data and data relating to use of force, strip searching and juveniles in custody. The majority of this data is currently manually extracted and analysed to allow scrutiny at the monthly Custody Management Meeting. Additionally, this reports into a quarterly Custody Management Group, chaired by the Superintendent in Criminal Justice Services and attended by partners including the Independent Custody Visitors (ICV) Chair and Police Authority Compliance Lead.

24. There is still work to be done to ensure accurate recording of equality data on custody records (as part of force wide improvements in recording equality data on Niche) and to improve and automate the range of metrics that can be scrutinised in respect of equality and disproportionality. A working group has been established to resolve this, and it will form part of the Power Bi dashboard due in 2026. This work is being overseen through the Operational Improvement Board.
25. As shown in **Fig. 5**, the largest percentage of detainees define themselves as white, followed by black then Asian. This is broadly consistent month on month. Where there have been variations from these trends, deep dives have been undertaken –To date no specific links/concerns have been identified.
26. On average around 10% of detainees are recorded as ‘not stated’ on the custody record. Further work is underway to understand why this proportion is so high and to ensure ethnicity is recorded effectively.

Fig. 5

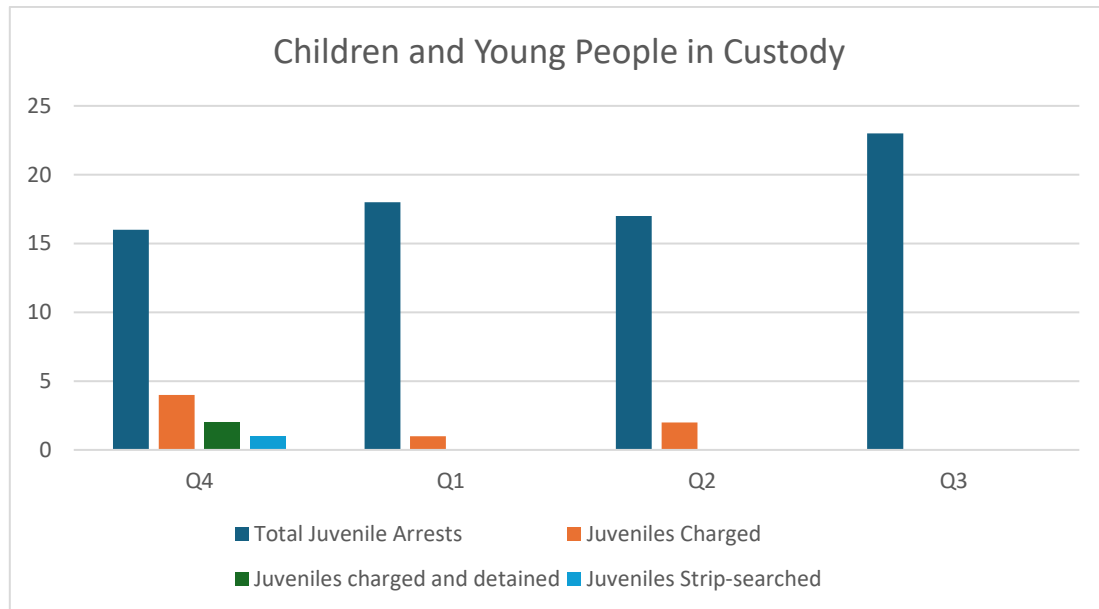


27. The ethnicity of children and young persons detained in custody is also monitored on a monthly basis. However the number of children detained is so low, there are no identifiable peaks/trends, and it is consistent with overall detainee demographics.

28. **Fig. 6** shows the quarterly breakdown of children and young people in custody who are charged and remanded and the number strip searched. This is consistently low. Children and young people (CYP) made up 3% of detainees in 2025. 25% fewer CYP were detained in 2025 in comparison to 2024 (74 compared to 99). Only two CYP were charged and detained over the past twelve months which is consistent with 2024 and extremely low. The reduction in CYP detained is a reflection of ongoing work to encourage officers to consider alternatives to custody for young people and reduce CYP arrest. It mirrors the

overall reduction in the number of detainees in custody and reduction in crime rates.

Fig. 6.



29. Every CYP detention record is scrutinised as part of the monthly custody quality assurance process to ensure policy has been adhered to and appropriate safeguards have been put in place for the young person, such as the presence of an appropriate adult, and ensuring sufficient grounds are recorded in line with PACE for any authorised strip search. The result of this QA is fed into the Custody Management Group via the Custody Manager’s report. Any specific feedback for officers or staff is dealt with directly with the individual or shared as wider learning through continuous professional development days or the custody newsletter.

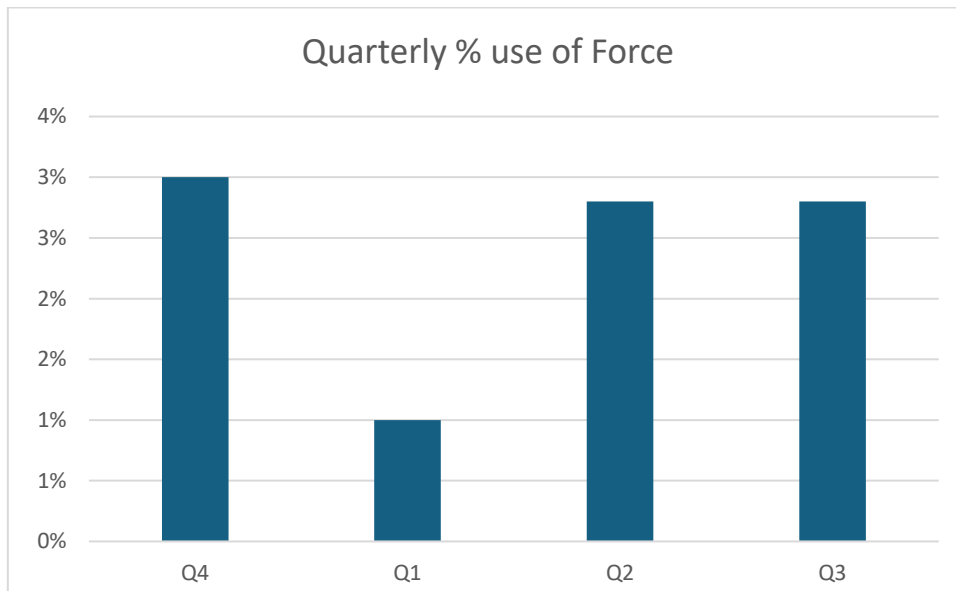
Use of Force and Strip Searching

30. As part of the monthly QA of custody records, the use of force and use of strip searching is monitored. This includes reviewing the detention log entry and rationale for use of force, alongside any available CCTV and completion of the required use of force form and reviewing rationale for strip searches.

31. The results of these findings are reported locally into the Custody Management Group. Overall Force Governance of Use of Force is through the stop and search and Use of Force Steering Group and Tactical group, chaired by the Superintendent of Taskforce. Custody data on both Use of Force and strip search is reviewed and considered in terms of disproportionality and learning at these meetings. Fig. 8. Illustrates the percentage of custody records where a use of force on the detainee has been recorded. This is consistently below 3%. It is difficult to compare to 2024 figures due to manual cleansing that has taken place

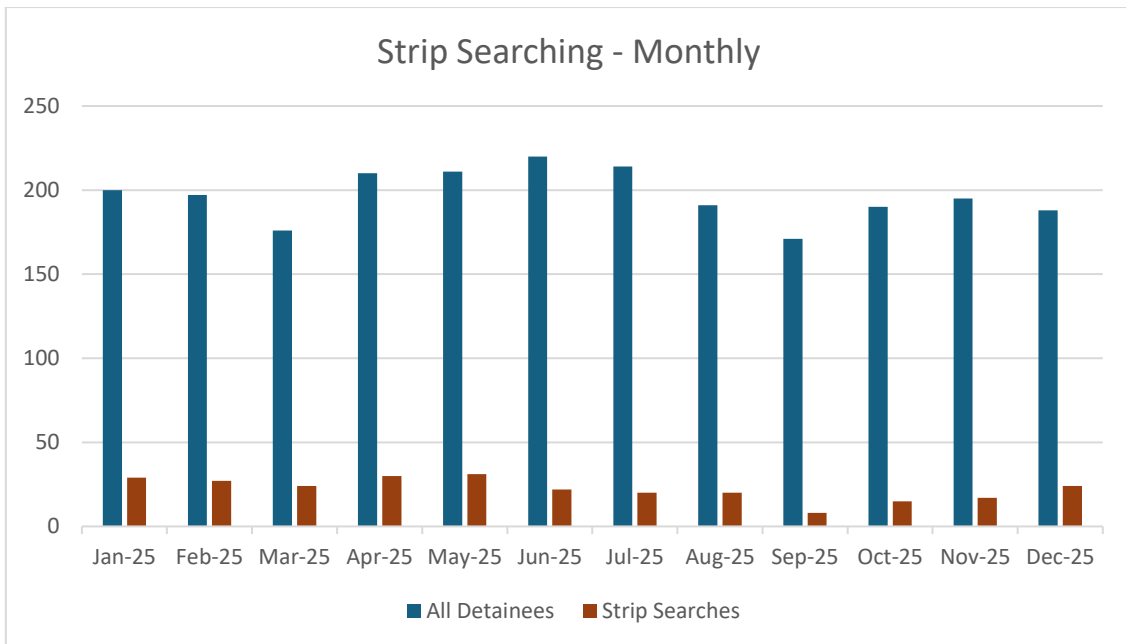
on date due to recording anomalies on Niche, however a significant improvements have been made to compliance of recording through activity driven by the Stop and Search Tactical group.

Fig. 8.



32. The use of strip searching in the CoLP Custody remains consistently low, and under 30 per month. QA has not raised any concerns in terms of application of legislation, dignity or recording. Fig 9 shows monthly numbers of strip searches in comparison to total detainees in custody.

Fig 9.



External Scrutiny

33. In addition to the strong internal governance over custody matters, COLP have developed external scrutiny processes following guidance, for PCCs and police forces to develop and introduce independent Custody Detention Scrutiny Panels (CDSPs).
34. The implementation of CDSPs was presented to the PAB as part of an ICV update report in June 2024 where it was agreed that due to the City of London's unique demographic, we would use our established Independent Advisory and Scrutiny Group (IASG) to scrutinise custody data on a quarterly basis.
35. Custody have now been presenting quarterly at the IASG panel. This includes providing data relating to use of force, strip searching and juveniles. This is still an area to develop and mature further, with an ambition for 2026 to include CCTV footage of use of force scenarios for scrutiny, and redacted custody records. Custody will work closely with the IASG and Professionalism and Trust colleagues to ensure we provide the IASG with the information and knowledge they need to effectively challenge and support learning and improvement in custody.
36. In February 2026, custody are presenting to the Youth IASG and will be seeking views and feedback on the custody environment and how this can be improved for young people.
37. In addition to the IASG, custody continue their excellent relationship with the Independent Custody Visitor Scheme, providing another layer of scrutiny and challenge, reporting into this board separately.

Culture and Training

38. Throughout 2025 the programme of training for custody sergeants and DDOs has continued, with mandatory annual refresher training and regular CPD (continual professional development) sessions covering a range of topics, including legislation and policy, dignity and respect, vulnerability and support.
39. In addition, custody staff have specific PDR objectives relating to equity and diversity and are required to complete 2 inclusivity modules per year. This has been closely monitored by supervisors to ensure compliance. In addition, as part of the regular CPD programme, custody staff have received bespoke inputs covering a range of topics to broaden understanding of community needs and perspectives. This has included alcoholics anonymous, homeless charities and VAWG specialists. CPD is designed to ensure it includes relevant learning from national reports (such as Baird and Angiolini) and other updates from the NPCC and College of Policing.
40. Most recently, following the Supreme Court ruling relating to gender, the Custody Management team have worked closely with the Professionalism and Trust Working Group to ensure that relevant policies and procedures are updated in line with NPCC interim guidance whilst balancing our own staff needs and views. This national guidance was produced through extensive consultation and legal advice, to balance the sensitivities and viewpoints of all those involved, whether staff, officers or detainees whilst adhering to legislation and PACE. Custody staff have received interim training, and a detailed training video is currently being produced for 2026.
41. Following the BBC Panorama Documentary, the Custody SLT met each custody team in person, to discuss the impact of the documentary, listen to concerns and reinforce standards of behaviour and conduct. No significant issues have been raised either within the cadre or organisationally in respect of the culture in custody.
42. Custody Management routinely view and monitor CCTV of activities in custody, allowing oversight of how detainees are managed, compliance with legislation, use of force and more nuanced behaviours around attitude and culture. Feedback both positive and negative on any of these areas is provided to specific officers or the entire team where relevant, via one-to-one meetings, team meetings and the regular monthly Custody Newsletter.
43. The complaints process for detainees and others visiting custody are clearly displayed and explained to detainees where required to ensure transparency.
44. Professional Standards have provided a summary of complaints made relating to custody in 2025. Only 4 public complaints (one per quarter) were received relating to custody issues. None related to use of force and were general procedural issues in relation to detention. There were no identified themes and 1 being held that the service provided had been acceptable. There were no conduct investigations relating to custody staff in 2025.

45. In addition, the custody team have received a range of positive feedback from both detainees, ICVs, and other professionals commenting on the professionalism and standards displayed by those in the team. Staff can also nominate members of the team for a quarterly award recognising commitment and dedication to custody activities and the policing plan ambitions. 2 members of custody staff were shortlisted for the recent force awards.

46. Recognising that wellbeing and health play an important role in maintaining a positive and professional culture, this features on every team agenda and custody have a wellbeing SPOC which feeds into the wider SO and organisational wellbeing governance – to ensure that the specific needs of the custody team are considered.

Corporate & Strategic Implications – [Please state ‘none’ if not applicable instead of deleting any of the sub-headings below]

None

[Sub-headings]

Strategic implications – Explain and provide assurance about how this proposal aligns with and will support the delivery of the Corporate Plan 2024-2029 (and note any CP performance metrics and associated data), any relevant corporate strategies and any relevant regional / national policies / international agreements.

Financial implications

Resource implications

Legal implications

Risk implications

Equalities implications – Explain how you have ensured the proposal complies with our public Sector Equality Duty 2010 - will the proposals within this report have any impact (positive or negative) on people protected by existing equality legislation – age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity? If so, this section should address how this will be factored into decision making, including reference to the Equality Impact Assessment if appropriate

Climate implications

Security implications

Conclusion

47. Police custody is a high-risk environment where custody staff are managing a wide range of vulnerabilities on a daily basis and demand has remained consistent across the past 12 months. It is encouraging to see the detention of young people reducing and low use of strip searching and use of force in custody. The dedicated custody cadre, and strong governance processes ensure that custody services are delivered in a professional, sensitive and

compassionate manner in line with the City of London Policing Priorities. External scrutiny of custody activities and EDI data continues to develop and the use of the IASG as an external scrutiny mechanism, will only strengthen our processes. Strong training and engagement with the custody staff will ensure we remain up to date with national policy, legislation and learning, and will maintain the culture of professionalism, openness and transparency.

Appendices

None

Anna Rice

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City of London Corporation Committee Report

Committee(s): Professionalism and Trust Committee – for information Independent Custody Visitor Panel – for information	Dated: 02/02/2026 22/04/2026
Subject: Independent Custody Visiting Scheme Annual Report 2024/25	Public report: For Information
This proposal: <ul style="list-style-type: none"> • provides statutory duties 	
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	NA
What is the source of Funding?	NA
Has this Funding Source been agreed with the Chamberlain’s Department?	NA
Report of:	Town Clerk
Report author:	Rachael Waldron, ICV Scheme Manager, Town Clerk’s Department

Summary

This report provides an update on the City of London’s Independent Custody Visiting (ICV) Scheme and presents the Panel’s annual report for the reporting period. It outlines recent issues raised by the ICV Panel regarding custody provision within the City and highlights key operational challenges address during the year. These include ensuring the timely attendance of Appropriate Adults during custody procedures, improvements to recruitment and onboarding processes within the City and contributions to the design of the new Salisbury Square custody facility to embed best practice.

Recommendation(s)

Members are asked to note the contents of this report.

Main Report

Background

1. The Independent Custody Visiting scheme has been firmly established and operating in its current form since November 2007. In May 2009, the Police Committee agreed that an annual report would be presented to the Committee to provide regular updates on the Scheme's progress and activities.
2. Independent Custody Visitors (ICVs) undertake unannounced visits in pairs to review the treatment and conditions of individuals held in custody. Their role is to ensure that detainees' rights and entitlements are upheld and that their dignity is maintained. These visits are carried out independently and confidentially on a voluntarily basis, with reports submitted to the City of London Police and the ICV Scheme Manager following each visit. The ICV Panel, comprising all custody visitors, meets quarterly with representatives of the City of London Police, typically including the Custody Manager. Any serious concerns identified during visits are escalated to the ICV Scheme Sponsor through the Scheme Manager.

Current position

3. The ICV Annual Report provides an overview of key issues identified within the custody environment, details the remedial actions implemented, and highlights examples of effective practice. It also sets out the objectives of the Independent Custody Visiting (ICV) Scheme for the current financial year.

Legal Implications

4. In accordance with Section 51 of the Police Reform Act (2002), the City Corporation is required to have in place an Independent Visitors Scheme.

Conclusion

5. The City of London Independent Visiting (ICV) Scheme continues to provide impartial oversight of custody operations, ensuring detainee rights, welfare and dignity are upheld. The Scheme reflects the commitment and professionalism of its volunteers, who have played a vital role in maintaining transparency and accountability throughout the reporting period.
6. The Panel extends its thanks to all Independent Custody Visitors for their dedication and valuable contribution to maintaining high standards within the custody environment.
7. Further updates on the Scheme will be presented to Members annually, reinforcing the City's commitment to openness and continuous improvement in custody provision.

Appendices

- Appendix 1 – ICV Annual Report 2024/25

Background Papers

ICV Guidelines – January 2017 Police Committee

Rachael Waldron

ICV Scheme Manager – Town Clerk's Department

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Annual Report
January 2026

City of London

Independent

Custody

Visiting

Scheme

Foreword, by the ICV Cohort of the City ICV Panel

The period from April 2024 to March 2025 has been one of heightened scrutiny for policing nationally. Public confidence and perceptions of procedural justice have been shaped by high profile documentary investigations into detainee treatment and the broader workings of the UK Policing and criminal justice system, alongside His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) PEEL 2023-2025 inspections of forces nationwide. These developments have reinforced the importance of transparency, ethical standards, and safeguarding within custody environments.

Custody remains a vital component of the criminal justice system, and the City of London Independent Visitors Scheme (ICV) Scheme has continued to act as a critical friend to the City of London Police, providing robust oversight to ensure detainees' rights, welfare and entitlements are consistently upheld. Through regular visits to Bishopsgate Custody Suite, the Scheme has broadened its understanding of the needs of detainees, including those with visible and non-visible disabilities, and how these needs evolve during detention.

Despite operational pressures, such as large-scale protests and events linked to international conflicts, which have occasionally drawn custody staff into frontline duties, the professionalism and sensitivity demonstrated by the City of London Custody Team has been commendable. Their commitment to safeguarding life and maintaining high standards has resulted in constructive detainee interactions and notably zero deaths in custody during this reporting period.

Significant investment in training and development for Custody Sergeants and Dedicated Detention Officers has strengthened resilience, with the Scheme contributing to learning initiatives led by the Force's Learning and Development Department. While promotions and secondments have created valuable opportunities for officers and staff to advance their careers, they have also introduced staffing challenges. Robust succession planning therefore remains essential to maintain high standards and deliver a safe and effective custody provision.

Mental health-related detentions remain challenging, often intensified by intoxication, acute crises and sporadic violence toward custody staff. The force's proactive approach, through initiatives such as mental health triage, neurodiversity screening and partnerships with organisations including Samaritans, Alcoholics Anonymous, and Veterans Aid, reflects a positive cultural shift towards safeguarding vulnerable individuals and addressing systemic risks highlighted by national reviews.

Looking ahead, the new state of the art custody facility at Salisbury Square opening in 2027, presents a major opportunity to strengthen detainee welfare and set new standards for modern policing. HMICFRS's 2018 inspection highlighted areas for improvement in custody provision, including the need for modern facilities that meet the highest standards of safety, dignity and operational efficiency. While significant progress has been made since that time, the forthcoming custody estate offers the chance to embed these principles into the very fabric of the building and its processes.

From an ICV perspective, this investment is more than bricks and mortar, it is a commitment to creating an environment that supports humane treatment, procedural fairness and accessibility for all detainees, including those with complex needs. Purpose built design will allow for improved observation and monitoring, enhanced privacy and better integration of health and wellbeing services. Dedicated space for mental health triage, neurodiversity screening, and confidential consultations will strengthen early intervention and safeguarding, reducing risks identified in national thematic reviews.

The new facility also provides scope for innovation in technology design, such as digital custody records, improved CCTV coverage and ergonomic layouts that support both detainee welfare and staff wellbeing. These advancements will help ensure compliance with legislative requirements and HMICFRS standards, while reinforcing public confidence in the integrity of custody operations.

Coupled with improvements in bail management, such as the introduction of a dedicated Bail Manager, the new custody estate will enable more consistent decision-making, reduce reliance on Released Under Investigation, and support timely progression of cases. This will not only improve detainee experience but also deliver wider benefits across the criminal justice system.

As a Panel, we welcome this forward-looking approach and remain committed to working in close partnership with the City of London Police as they embark on this significant development. The new custody facility at Salisbury Square is not simply a structural upgrade, it is an opportunity to set a benchmark for best practice nationally, ensuring that custody provision reflects the highest standards of safety, dignity and operational compliance.

Our collaboration will focus on maintaining alignment with HMICFRS recommendations, supporting the City of London Police with their preparedness for future inspections and embedding lessons learned from previous reviews into the design and operation of this modern environment.

The Panel's role will continue to be pivotal in provision independent oversight, safeguarding the principles of dignity, fairness and procedural justice for all detainees. We will also continue our engagement with the Independent Custody Visitors Association (ICVA) to ensure that national themes and emerging best practices are consistently addressed at a local level.

Together, we aim to ensure that this new custody estate is not only fit for purpose today but designed to meet the evolving needs of policing and the communities we represent for years to come.

We extend our sincere thanks to the City of London Police Custody Manager, the Custody Team, the Police Authority Board ICV Scheme Sponsor Member, and the Scheme Manager for their continued dedication to custody provision and the work of this group.

City of London Independent Custody Visitors Scheme

Foreword, by Independent Custody Visiting Scheme Sponsor, Police Authority Board Member Deborah Oliver

This report, covering April 2024 to March 2025, provides assurance on progress made in custody provision and highlights areas for improvement.

Over the past year, policing and custody services nationally have been shaped by thematic priorities from His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), the Independent Office for Police Conduct (IOPC), the Independent Custody Visitors Association (ICVA), and the College of Policing.

Against this backdrop, the City of London Independent Custody Visiting (ICV) Scheme has continued to provide robust oversight, supporting the Police Authority in meeting its statutory responsibilities and safeguarding detainee welfare. I'm encouraged by the strong culture of care and accountability demonstrated by custody team.

Feedback from City ICVs both through written reports and verbal observations, consistently highlights the professionalism and dedication of the City of London Police custody team. Their commitment to maintaining high standards, treating detainees with dignity and ensuring compliance with legislation is evident throughout this reporting period. This provides reassurance that custody operations remain aligned with national expectations and best practice.

The reduction in detainee numbers, particularly among children and young

people reflects national priorities to divert juveniles away from custody. Low use of strip searching and force, alongside strong quality assurance processes, demonstrates a clear commitment to dignity and compliance with legislation. Embedded healthcare provision and referral pathways for vulnerable detainees, including mental health and substance misuse support are commendable and align with national safeguarding standards. The Force's proactive approach to cultural integrity, reinforced through training and CPD, further strengthens confidence in the professionalism of our custody cadre.

However, there are areas requiring continued focus. The outstanding HMICFRS recommendation on equality data and disproportionality remains a priority. Accurate and timely recording of EDI data must be embedded to enable effective scrutiny. The introduction of the City of London Police's Equality, Diversity and Inclusion Strategy, published in July 2024 presents a significant opportunity to address disproportionality and improve transparency in detention figures going forward.

Operational resilience continues to be an important priority. Staffing pressures have highlighted the need for effective workforce planning, and ensuring timely attendance by Appropriate Adults remains essential to safeguarding vulnerable detainees.

The forthcoming development of a modern custody facility at Salisbury Saure represents a significant step forward in strengthening custody provision and

embedding best practice for the future. This investment, alongside deeper partnerships and sustained external scrutiny through mechanisms such as the City ICV Scheme, will help ensure custody services remain professional, transparent and aligned with national standards.

The City ICV Scheme remains committed to supporting the City of London Police as they build on these improvements, ensuring custody provision remains professional, transparent and trusted by the public.

INTRODUCTION

THE CITY OF LONDON INDEPENDENT CUSTODY VISITING SCHEME (ICV SCHEME)

The purpose of this report is to provide an overview of the City of London ICV Scheme in the period of 1 April 2024 to 31 March 2025 including:

- the Panel's performance.
- areas of good practice or issues and concerns the visits have raised; and
- objectives of the ICV Scheme for 2025/26.

The City of London Corporation, as the Police Authority for the City, is a separate body to that of the City of London Police. It has a statutory duty to ensure the delivery of the Independent Custody Visiting Scheme. Oversight of the ICV Scheme is provided by the Police Authority Board.

Independent custody visiting is governed by a range of legislation and guidance including the Police and Criminal Evidence Act (PACE) 1984 and Home Office Codes of Practice and National Standards (2013).

ICVs are members of the local and business community who volunteer to visit police

stations on an unannounced basis to check on the treatment of detainees and the conditions in which they are held. To be eligible to become an ICV, individuals must:

- be over 18.
- be independent from the police force and policy authority; and
- have no direct involvement in the criminal justice system.

The City of London ICV Panel currently consists of 8 volunteers who visit the custody suite situated at Bishopsgate Police Station on an unannounced basis once a week.

The City of London ICV Panel collaborates closely with the Mayor's Office for Policing and Crime (MOPAC) to highlight issues in custody detention, such as delays in the attendance of Appropriate Adults and legal representation for detainees.

A member of the Police Authority Board attends the quarterly Panel meetings along with a representative of the City of London Police to ensure that any questions or concerns that have surfaced from visits to custody can be adequately addressed. The quarterly Panel meetings are supported by the Police Authority ICV Scheme Manager.

THE ROLE OF INDEPENDENT CUSTODY VISITORS

To ensure the safety and wellbeing of volunteers, it is mandatory for visits to custody to be undertaken in pairs. Visits to custody are made on an unannounced basis so ICVs can look, listen, and report on conditions in custody at the time of their visit.

The primary objective of all visitors is to observe and report on the treatment and conditions of individual detainees and to check that their rights and entitlements are being observed.

ICVs are always accompanied by a custody officer throughout their visit to custody. Each detainee is provided with an opportunity to

engage and speak directly to custody visitors. Circumstances may arise where detainees should not be disturbed, particularly when they are asleep during a rest period, or when specific health or safety risks have been identified which prevent an interview from taking place. Detainees may only be interviewed with their consent and may choose not to provide permission.

Visit interviews with detainees are undertaken in clear sight, but out of earshot of the escorting officer so details of what visitors see and hear remain confidential. Strict rules of confidentiality apply so detainees are identified by their custody numbers only. ICVs are independent and impartial. They do not provide advice or involve themselves in the process of investigation. In this respect, they are not concerned with any alleged offence and cannot perform tasks on behalf of the detained person.

ICVs complete a report to record details of the visit. The information included in this report focuses on actions for City of London Police and the ICV Scheme Manager and can include:

- details of any good practice ICVs have observed during their visit;
- reference to any immediate problems encountered and resolved at the time of visiting; or
- details of any matters requiring further action.

Copies of the reports are provided to the Superintendent (if appropriate), the Custody Manager and the ICV Scheme Manager. The information provided within each report is discussed by the ICV Panel at the next review meeting. If necessary, more serious issues can be highlighted directly to the Police Authority Board or dealt with outside Panel meetings.

PANEL MEETINGS

Quarterly Panel meetings provide ICVs with an opportunity to discuss each visit and raise any

issues that have arisen across the previous quarter.

Short update and information sessions are also incorporated into each agenda to ensure ICVs are kept up to date and well informed of national developments regarding the custody environment.

Topics discussed this year included:

1. Recruitment of New ICVs

Membership of the City ICV Scheme has increased from 5 to 8 volunteers, achieving an equal balance of four male and four female volunteers.

Outcome: This improvement delivers on a previous commitment to expand the membership of the City's voluntary cohort and strengthen the resilience and capacity of the Scheme. Membership has increased from five to eight volunteers, achieving an equal balance of four male and four female volunteers and improving the ethnic diversity of the Panel.

These changes enhance the breadth of perspectives within the Scheme, ensuring that custody visiting reflects a wider range of experiences and helps to maintain the quality and frequency of unannounced visits to custody.

2. Use of Force

Scrutiny and oversight of custody operations remain a key focus covered in HMICFS inspection reports and external scrutiny mechanisms have continued to strengthen, ensuring transparency and accountability in detainee management.

The proportion of custody records indicated that detainee experienced use of force during their detention in City custody cannot be reliably compared year on year due to recording anomalies

identified within the Niche system. During the reporting period, these anomalies required manual review and cleansing to ensure the accuracy of the 2025 dataset; however this process was not applied to 2024 records. Although the uncleansed 2024 data suggests a use of force rate of approximately 17%, this figure should not be interpreted as a direct comparison.

Incidents involving the use of force that have raised concern, or where further explanation of the circumstances was required, have been escalated directly to the Scheme Manager. These matters have been addressed in collaboration with Custody Management and incorporated into individual officers' continuous professional development processes, ensuring that learning and improvement are embedded.

Custody Management have also provided detailed explanations of the rationale for the use of force, the circumstances surround each incident highlighted, and the outcomes for individual officers during panel meetings. This approach reinforces transparency and supports informed scrutiny by external stakeholders.

3. Appropriate Adult Attendance

The presence of an Appropriate Adult during procedures involving juveniles and vulnerable adults in police custody is a statutory safeguard established under the Police and Criminal Evidence Act 1984 (PACE). Appropriate Adults play a critical role in protected the rights and welfare of these individuals, ensuring they are treated fairly and can fully participate in the detention process.

Their responsibilities include facilitating communication and accompanying

detainees during key stages of the detention process, such as interviews, sample collection, and bail charging. National Standards require attendance within 90 minutes of request, and performance data for this reporting period demonstrates a compliance rate of 85% for arrivals within this timeframe.

Outcomes: The Scheme Manager has worked closely with the Custody Manager to ensure that all detainees requiring support receive it under an annual contact arrangement. Monitoring meetings between the Custody Manager and the Commissioning Team have continued throughout the reporting period to review performance and address any concerns promptly.

To mitigate delays in attendance, the City of London Police has maintained an on-the-spot purchase arrangement with the Appropriate Adult Network, providing additional resilience and ensuring timely support for vulnerable detainees. This provision was accessed on 35 occasions during the reporting period.

4. Professional Development, Continuous Professional Development (CPD) Opportunities

Professional development has remained a cornerstone of custody operations throughout the reporting period. ICVs have consistently been briefed on the delivery of CPD sessions and the introduction of new training modules designed to address identified gaps and emerging priorities. Key areas of focus included:

- Mental health awareness and suicide prevention, supported by external partnerships such as the

Samaritans Listening Service and James's Place.

- Equality and diversity training: including care for transgender detainee and gender sensitive practices.
- Legal compliance and operational governance, covering Police and Criminal Evidence Act (PACE) updates, Bail and Released Under Investigations (RUI) procedures and risk assessment standards.
- Practical skills development, such as searching protocols, pre-release risk assessments and detainee safeguarding.

Training needs analyses informed the structure of the 2025 CPD programme, ensuring that content remains relevant and responsive to operational challenges. The introduction of a "Train the Trainer" initiative will further strengthen the mentoring and coaching capabilities within the custody cadre.

Outcome: These initiatives have enhanced staff competence and confidence, ensuring custody officers are equipped to deliver safe, lawful, and dignified detention in line with NPCC strategic principles of professionalism and betterment.

5. Recognition and Professionalism

Recognition of custody as a specialist area has been a recurring theme throughout this reporting period with:

- Awards and commendations for staff and volunteers, including Force Awards and external recognition for partnership work.
- Initiatives to raise the profile of custody roles and acknowledge the

professionalism and resilience of the custody cadre.

Outcomes: Reinforcing professionalism and recognising achievement has strengthened the identity of custody as a critical component of policing and the criminal justice system.

6. Safeguarding Vulnerable Detainees

Safeguarding has been a recurring priority, with custody management reporting on measures to identify and support detainees with complex needs. Key developments across this reporting period have included:

- Continuation of ADHD Screening pilots and broader neurodiversity awareness initiatives.
- Expansion of mental health first aid training, with positive feedback received from HMICFRS and external stakeholders.
- Suicide prevention strategies, including listening skills training and awareness campaigns delivered in partnership with the Samaritans.

These measures have been complemented by improved signposting to specialist services and the integration of bespoke referral pathways for detainees presenting with mental health or substance misuse vulnerabilities.

Outcome: Enhanced early identification and intervention for vulnerable individuals has reduced risk and improved welfare outcomes, reinforcing the City of London Police's commitment to safeguarding.

7. External Partnerships and Community Engagement

- Samaritans, providing in house custody listening services and staff training.
- Alcoholics Anonymous and Narcotics Anonymous, offering post-release support for individuals with additions issues.
- Veterans Aid, delivering rapid intervention for ex-service personnel facing homelessness or crisis.
- Jamess Place, providing suicide prevention and therapeutic support for men in acute distress.

These partnerships have been recognised nationally as examples of good practice with the City of London Police model influencing similar initiatives in other forces.

Outcome: Multi-agency collaboration has expanded signposting opportunities, ensuring detainees receive holistic support beyond custody and contributing to improved wellbeing.

8. Development of new custody facility at Salisbury Square

The City of London ICV Scheme has continued to play an active role in shaping the design and functionality of the new custody facility at Salisbury Square. Building on earlier consultation stages, ICVs provided feedback on key aspects of detainee welfare, privacy and accessibility, ensuring that the proposed design reflects national standards and best practice. Specific contributions included:

- Recommendations on exercise yard visibility
- Interview room layout
- Integration of technology to support transparency and monitoring.
- Emphasis on the importance of creating a safe and inclusive environment for vulnerable detainees, including children, women and individuals with neurodiverse needs.

These inputs have been shared with the design team for consideration and integration across evolving project design plans, with further engagement planned in 2026.

Outcome: This collaborative approach demonstrated a commitment to embedding independent scrutiny into the planning of the new facility, reinforcing public confidence and aligning with NPCC aspirations for a modern, professional custody environment.

9. Priorities for 2025/26

- Collaborate with the City of London Police to ensure that feedback provided by Independent Custody Visitors (ICVs) on the Salisbury Square custody design programme is fully considered within the consultation process and reflected in the delivery of a code-complaint custody suite.
- Enhance the resilience of the City Scheme through further recruitment and onboarding of new volunteers.
- Maintain and deliver a fully code complaint Independent Custody Visiting Scheme in accordance with

the Independent Custody Visiting Association (ICVA) Quality Assessment Framework.

Conclusion

The developments highlighted across the reporting period demonstrate a sustained commitment to delivering a custody service that is safe, professional, and aligned with national standards.

Operational resilience has been tested during periods where custody has operated with minimal staffing levels as a result of competing operational priorities.

Despite these challenges, the custody cadre has maintained service delivery and safeguarded detainee welfare through continuous investment in staff training and inclusive practices.

In parallel, the development of strategic partnerships has improved transparency and accountability across custody operations, while formal recognition of staff contributions has fostered a culture of professionalism and excellence.

Collectively, these initiatives support public confidence in the integrity of custody operations and reflect the City of London Police's determination to uphold the highest standards of care and procedural justice.

Visit Statistics

	Total Number of detainees in Custody at the time of visit	No of detainees offered visit	No. of detainees accepted visit
Bishopsgate Q1	26	16	14
Bishopsgate Q2	17	6	3
Bishopsgate Q3	19	11	11
Bishopsgate Q4	6	5	5
Total	68	38	33

ISSUES AND CONCERNS ARISING FROM VISITS

The lists of issues and concerns reflects the range of issues that have been raised by detainees in the last year and other issues which have been reported by ICV Panels elsewhere for which there has been a nil return for the City of London.

	Bishopsgate
No of Total Visits	
Report Form with no matter requiring a police response	8
Infrastructure/furnishing/ fittings/out of service	20
Comments individual officers – positive	9
Comments individual officers – negative	2
Cleaning, tidiness and general hygiene – positive	5
Cleaning, tidiness and general hygiene – negative	2
Information Technology	13
Temperature	6
Health related matters	20
Procedures not followed	0
Rights and entitlements seemingly delayed	0
Personal hygiene requests – (showers, washing etc)	0
Requests for phone calls	14
Perceived risk for detainees	0
Periodic checks (15, 30 minutes) not maintained	0
Requests for food and drink	3
Requests for literature/documents	5

Station	Target No of Visits	Achieved	% of Target
Bishopsgate	52	27	52

DAYS OF VISITS

	No of Visits	% (figure expressed to two decimal place)
Monday	2	7.40
Tuesday	6	22.22
Wednesday	5	18.51
Thursday	7	25.92
Friday	6	22.22
Saturday	1	3.77
Sunday	0	0
Total	27	

TIME OF VISITS

00.01-06.00	0
06.00-12.00	13
12.01-18.00	10
18.01-00.00	4

DAYS OF VISITS/TIMES - COMBINED

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
00.01-06.00	0	0	0	0	0	0	0
06.01-12.00	1	3	1	5	2	1	0
12.01-18.00	0	2	3	1	4	0	0
18.01-00.00	1	1	1	1	0	0	0
	2	6	5	7	0	0	0

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