

|   |   |
|---|---|
| <b>Committee(s):</b><br>Police Authority Board- For information   | <b>Date(s):</b><br>29 <sup>th</sup> July 2020 |
| <b>Subject:</b><br>Annual Report on Professional Standards Activity – 2019/20                             | <b>Public</b>                                 |
| <b>Report of:</b><br>Commissioner of Police<br>Pol 48-20  | <b>For Information</b>                        |
| <b>Report author:</b><br>DCS Angie Rogers / PC Ann Roberts obo Assistant Commissioner Alistair Sutherland |   |

### Summary

This report provides a comprehensive overview of activities relating to Police Professional Standards over the year 2019/20, giving an account of both the work of your Professional Standards and Integrity Sub-Committee and of the Force's Professional Standards Department (PSD) during this period.

Your Sub-Committee discharges an essential role of oversight and scrutiny of the Force's handling of complaint and conduct matters. It also provides invaluable support to the work of the Organisational Learning Forum (OLF) and the Force's Integrity Standards Board (ISB) incorporating the Police 'Code of Ethics'.

This report also provides a summary of performance statistics<sup>1</sup> which are submitted annually to the Independent Office for Police Conduct (IOPC). Overall the recorded number of complaint cases has increased in this period. This is partially attributable to an increase in complaints recorded/logged relating to Action Fraud, the fraud reporting service hosted by the Force which has a national remit. Complaints relating to City of London Police personnel have seen an increase against the previous year – which was particularly low. Figures are low relative to the number of interactions with the public and to the complaint figures for other Forces.

The City of London Police's PSD records complaint cases within the target of 10 days (79%). The time the Force takes to complete local investigations which is lower than the national average (88 days compared to the national average of 152 days). The levels of upheld appeals (both Force and IOPC appeals) reflect the excellent investigation standards of the Professional Standards Department, with only three appeals (non- recording) being upheld in the reporting period.

PSD continues to improve the visibility of the department through improved internal communication and PSD training inputs across the Force.

The Organisational Learning Forum (OLF) monitors trends identified as potential concerns and identifies where action such as changes to operational procedures or specific training might drive service improvements. During 2019/20 examples of action taken following OLF include a number of changes to procedures, including but not exhaustively, use of body worn cameras and autism awareness training.

*NB: For the benefit of Members, a glossary of technical terms has been included as an Appendix.*

---

<sup>1</sup> Last bulletin produced by the IOPC Q3 due to changes in Police Regulations

## **Recommendations**

That the report is received and its contents noted.

### **Main Report**

#### **The Professional Standards and Integrity Sub-Committee**

1. The Professional Standards and Integrity Sub-Committee has responsibility for providing detailed oversight of professional standards in the City of London Police. During 2019/20, it received statistical updates on complaint cases and trends relating to (a) the nature of allegations in complaints, and (b) the means by which those allegations are resolved. The Sub-Committee continues to perform a highly detailed scrutiny function to examine the casework of every complaint recorded by the Force – this is unique among all Offices of Policing and Crime Commissioners and local policing bodies.
2. The Sub-Committee has worked with the Director of the Professional Standards Department (PSD) to ensure that the papers reviewed by Members contain sufficient information to be able to assess whether an appropriate outcome was reached, while not unnecessarily revealing personal details of individuals involved or creating extra workload.
3. In 2019/20 the Sub-Committee continued to look at matters of conduct; it received updates on all misconduct meetings and hearings which had been dealt with by the Force. The Sub-Committee receives updates on Unsatisfactory Performance Procedures (UPP), which concern performance or attendance issues (as opposed to misconduct). It continues to receive updates on Employment Tribunal cases concerning police officers and police staff. These outlined the nature of claims and the outcome of cases. A report from the Integrity Standards Board (ISB) and integrity dashboard are also scrutinised. This includes the gifts & hospitality received by the Chief Officer team.
4. During the reporting year the members visited the PSD department and met with the Director of PSD Angie Rodgers, and the SMT – they also were provided a number of inputs from the areas within the PSD department to gain a valuable insight of the investigation standards. Members reflected that the experience had been worthwhile.
5. The Sub-Committee continues to support the Force in ensuring themes identified in complaint or conduct cases are progressed as issues of Organisational Learning. This is done through the PSD Working Group (PSDWG). The Force's Organisational Learning Forum (OLF), chaired by the Assistant Commissioner, includes representation from all Force Directorates and has a series of working groups focusing on specific areas of organisational learning, including PSD, Custody and Public Order. The Sub-Committee is represented by Oliver Bolton, from the Town Clerk's Department, who attended meetings of the PSDWG in 2019/20, and the Sub-Committee received a digest of highlighted areas/themes of learning at every meeting.

#### **The Work on Police Integrity & Code of Ethics**

6. Integrity is driven within City of London Police by three units: Strategic Development holds the Force lead for overseeing how integrity is embedded in the organisation,

principally through initiatives delivering the objectives of the National Police Code of Ethics. PSD educates, monitors and investigates issues that impact on integrity while Organisational Development Department is responsible for ensuring that integrity informs and enhances workforce development.

7. City of London Police continues to deliver initiatives supporting workforce and organisational integrity. The Chairman of the Professional Standards and Integrity Committee supports these activities as a critical friend, which helps to drive continuous improvement in this area. Amongst the things the Force now has in place are:

- A quarterly Integrity Standards Board (ISB) that is chaired by the Assistant Commissioner and attended by the Chairman of the Professional Standards and Integrity Committee together with a representative from the Police Authority. The Board considers information against a range of indicators that highlight where individual or organisational integrity might be called into question. The Board also receives regular updates on activities to promote and embed the Police Code of Ethics into business as usual. During 2019/20 the indicators that are considered by this board were revised, and were informed by feedback from Members of your Professional Standards and Integrity Committee.
- An annual Integrity and Code of Ethics development plan, which is considered at your Professional Standards and Integrity Committee.
- An internal group of Ethics Associates, who meet to consider ethical dilemmas and situations as part of the Regional London Police Challenge Forum, of which the City of London Police was a founding member. The Force shares hosting the meetings, alternating with the British Transport Police and Metropolitan Police Service. The Commander Operations and the Head of Strategic Development are both members of the Regional Police Ethics Network and the national UK Police Ethics Guidance Group.

8. During 2019/20 the Force also underwent a peer review of its arrangements supporting the Police Code of Ethics and ethical decision making. The review was conducted by a Professor of Criminology and Ethics (Bath Spa University) and Chief Superintendent from Devon and Cornwall Police. The review was broadly complimentary of the Force's arrangements. Observations made in the review have informed the revised Integrity and Code of Ethics development plan.

### **HMICFRS<sup>2</sup> Legitimacy Inspection**

9. Part of HMICFRS's annual inspection programme examines forces' legitimacy. The inspection looks specifically at the extent to which forces:

- Treat people with fairness and respect;
- Ensure their workforce act ethically and lawfully; and
- Ensure the workforce themselves have been treated with fairness and respect.
- The last report relating to the City of London Police was published in May 2019, details of which were included in the previous annual review submitted to your Board. No Integrated PEEL<sup>3</sup> Assessment for 2019/20 has taken place.

---

<sup>2</sup> Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services

<sup>3</sup> Police Efficiency, Effectiveness and Legitimacy

10. In September 2019 HMICFRS published “Shining a light on betrayal (abuse of position for sexual purpose)”. This was a national report that focused on one aspect of the PEEL Legitimacy criteria covering abuse of position for sexual purposes. It considered the progress forces have made tackling this issue following previous reports on the subject dating back to 2015. The report and its findings were submitted to both your Police Performance and Resources Committee and Professional Standards and Integrity Committee.

### **Independent Office for Police Conduct (IOPC)**

11. The IOPC collects complaint data from all 43 Forces in England and Wales and produces a quarterly statistical bulletin. Each Force is provided an individual Bulletin containing complaint data, data compared to the “most similar force” (which the CoLP does not have given its unique size and remit) and national data. The IOPC also reports on its own performance. It produces an Annual Report on complaint statistics which allows Forces to see all national Force data together, and outlines any national trends on the reporting, investigation and appeals to the IOPC. The full annual report for all Forces for the previous year’s data 2019/20 is published later into this year period. This maybe delayed by both the impact of the changes to the Police Regulations on the data and the Covid-19 pandemic. The IOPC acknowledge the complaints generated from Action Fraud which is a national service.

12. CoLP PSD referred 6 cases to the IOPC during 2019-20<sup>4</sup>. During the same period the total number of method of investigation (MOI) decisions by the IOPC were for 5 to be locally investigated by CoLP, 1 to be independently investigated by the IOPC and 0 to be supervised by the IOPC. Currently the IOPC is conducting a total of 3 independent investigations. The volume of independent investigations reflects an increase in staff, span and scope of the IOPC involvement and the case referral criteria.

13. According to IOPC data, the City of London Police’s PSD performs well in terms of the time the Force takes to complete local investigations which is lower than the national average (88 days compared to the national average of 157 days<sup>5</sup>). The levels of upheld appeals (both Force and IOPC appeals) reflect the excellent investigation standards of the Professional Standards Department, with three appeal (non- recording) being upheld in the reporting period.

### **Complaints**

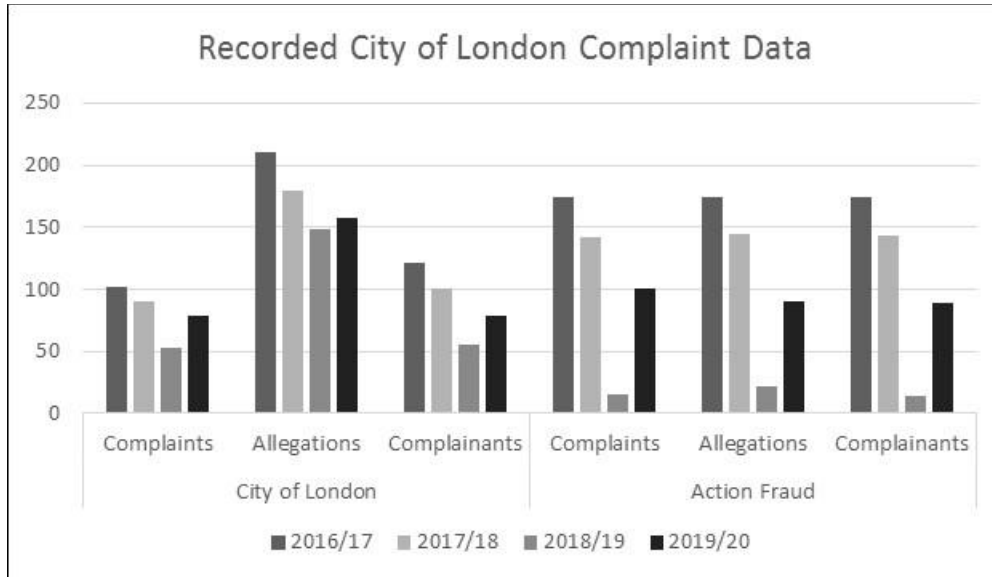
#### Recorded Complaints

---

<sup>4</sup> Rolling year – some matters recorded during the previous quarter or year

<sup>5</sup> Based on the last published quarterly bulletin by the IOPC Q3 (01/10/2019-31/12/2019)

|                | City of London |             |              | Action Fraud |             |              |
|----------------|----------------|-------------|--------------|--------------|-------------|--------------|
|                | Complaints     | Allegations | Complainants | Complaints   | Allegations | Complainants |
| <b>2016/17</b> | <b>102</b>     | <b>210</b>  | <b>121</b>   | <b>174</b>   | <b>174</b>  | <b>174</b>   |
| <b>2017/18</b> | <b>90</b>      | <b>180</b>  | <b>100</b>   | <b>142</b>   | <b>145</b>  | <b>143</b>   |
| <b>2018/19</b> | <b>53</b>      | <b>148</b>  | <b>56</b>    | <b>15</b>    | <b>22</b>   | <b>14</b>    |
| <b>2019/20</b> | <b>79</b>      | <b>157</b>  | <b>79</b>    | <b>101</b>   | <b>90</b>   | <b>89</b>    |



14. The City of London Police is the national Lead Force within the UK for Economic Crime investigation and since April 2013, receives all reports of fraud reported across England and Wales through the 'Action Fraud' reporting process. Complaints regarding the delivery of the Action Fraud service are recorded under the Appropriate Authority of the City of London Police. The IOPC has acknowledged the complaints generated from Action Fraud as a national service, but the figures are included with the City of London data (due to falling within the remit of the City of London Police Appropriate Authority).

15. During 2018/19 PSD were recording all AF complaints and sending them to ECD who resolved them. PSD were able to reduce the number of AF complaints formally recorded under Schedule 3, by evoking the Action Fraud Complaints policy at the time where all complaints went through their complaints process before PSD would consider a formal complaint under Schedule 3. This significantly reduced the number of complaints being recorded but probably increased the number of complaints and queries that the NFIB Info Hub were dealing with. This gave an unreliable reflection of the volume of complaints regarding the AF process and the scale of the problem being dealt with.

16. Of those complaints that PSD recorded, they only related to service failings e.g. not providing updates when requested. Complaints about decisions not to disseminate reported fraud for investigation were no longer recorded as it was agreed with the IOPC, and supported on appeal, that these met the Schedule 3 exemptions. These figures did not include the rise in MP letters that ECD were attempting to deal with. These are now being dealt within PSD, which has included a requirement to increase

staff to address this demand, and the increased logging of complaints for PSD rather than ECD resolution, whether in or out of Schedule 3, under the new regulations – including those we would have previously non-recorded. Therefore the data during 2018/19 cannot be compared against any other period.

17. The volume of recorded Action Fraud complaints is extremely low compared to the number of fraud reports to Action Fraud. 2019/20 complaint figures represent 0.01% of all Action Fraud reports received in the same period.

18. Members of Parliament who write in on behalf of a constituent are now provided written information relating to the process and expectations of the Action Fraud reporting tool. If their constituent remains dissatisfied, the process they need to take to make their own complaint. MP's cannot make a complaint on their behalf.

### Allegations Recorded

19. A total of 247 allegations were recorded in 2019/2020. In terms of nature of allegations, the *highest* categories were:

| Type:                                    | Number allegations: | Overall percentage |
|--|---------------------|--------------------|
| General Policing Standards               | 60                  | 24%                |
| General level of service*                | 27                  | 11%                |
| Incivility, impoliteness and intolerance | 22                  | 9%                 |
| Other irregularity in procedure          | 18                  | 7%                 |
| Other neglect or failure in duty         | 13                  | 5%                 |
| Other Assault                            | 14                  | 6%                 |
| Discriminatory behaviour                 | 11                  | 4%                 |
| Decisions*                               | 10                  | 4%                 |

\*denotes new regulation allegation types from 01/02/20

20. 2019/20 City of London Police complaint data accounts for 44% of the total cases recorded. This is a reversion to data in 2017/18 where Action Fraud cases formed the majority at 61%. This is due to the adjustment in recording standards of complaints relating to Action Fraud last year where the CoLP accounted for 78%.

21. General Policing Standards, General level of Service\* and Decisions\* allegation types are almost all relating to Action Fraud. \*new regulation allegation types from 01/02/20.

22. The allegation type Incivility has returned as the highest allegation type. However with the use of Body Worn Video (BWV) most allegations are not substantiated. Many of these allegations are surrounding perceived communication skills. Neglect of Duty still remains within the highest allegation categories in this reporting period. This allegation type has been the highest in the previous three year's data, and reflects the national picture. Other irregularity in Procedure is a similar category and of the procedural types where expectations have not been met. All of these allegation types, where possible,

have learning disseminated. The effective use of Body Worn Cameras have been instrumental in the investigation of such recorded complaints and the outcomes.

23. There were 11 allegations of “discriminatory behaviour” recorded during 2019/20; these sub categorise into 5 Race, 3 Other, 1 Mental Health, 1 Gender, and 1 Disability. Of this allegation type 10 were finalised<sup>6</sup> following a PSD investigation, with outcomes as follows: 7 allegations were ‘not upheld’, 2 were Locally Resolved. One allegation was withdrawn by the force.

### Finalised Allegations

24. In the last year a total of 139 allegations were finalised. 129 of which were investigated by PSD. A total of 4 (3%) were upheld. *Table shows highest Allegation categories finalised.*

| Type:                                    | Number allegations: Upheld | Number of Allegations: Locally Resolved | Total Allegations (Finalised by all means) |
|--|----------------------------|---|--|
| General Policing standards               | 0                          | 20                                      | 27   |
| Incivility, impoliteness and intolerance | 1                          | 14                                      | 20   |
| Other neglect or failure in duty         | 0                          | 7                                       | 16   |
| Other irregularity in procedure          | 0                          | 9                                       | 15   |
| Discriminatory behaviour                 | 0                          | 2                                       | 10   |
| Other Assault                            | 0                          | 0                                       | 6  |

25. There has been an increase in Local Resolution as a means to finalise allegations. During 2019/20 Including Action Fraud data, 50% allegations were finalised by means of Local Resolution. Figures for the previous year was 36%. National average data for end of Q3 2019/20 is reported as 50%. Any adjustments in Action Fraud complaint recording have a dramatic impact upon Local Resolution data where most complaints are a service recovery. Local resolution figures are returning to the same levels prior to the Action Fraud data recording changes. This finalisation is no longer relevant following the regulation changes this type of organisational complaint will be logged and service recovered.

### **Complainant Characteristics**

#### *Ethnicity*

26. PSD does record data relating to the ethnicity of the complainant. However, meaningful data is difficult to collect as complainants are often reluctant to self-identify. 74 out of the 168 complainants (44%) did not state their ethnicity. The highest category

---

<sup>6</sup> The finalised allegations are from a rolling period therefore may not be cases recorded in the same year.

recorded is White British, 24 complainants have self-defined their ethnicity within this group (14%). These are similar statistics to previous years.

### *Gender and age*

27. A total of 168 complainants were recorded in 2019/20. Of these 118 stated they were male, 34 female and in 16 cases gender is unknown. Most complainants do not state age, but from what the Force has recorded, the highest category is 40-49 years of age with 20 (12%). This is the same age group as the previous year. Of the groups aged 20-39 a total of 32 complainants disclosed their age (19%). 85 complainants provided no data (51%).

### **Organisational Learning Forum and other internal groups**

28. Learning issues are central to the work of PSD. Complainants often express that they want the officer/organisation to acknowledge what went wrong, and understand how the Force will ensure that similar issues will not happen again. The Organisational Learning Forum (OLF) chaired by AC Sutherland, is well established, has been operating for several years and meets on a quarterly basis.

29. The work of the OLF cuts across the organisation, it is a decision making forum and if necessary issues are escalated to the Force's Strategic Management Board (SMB). The OLF has the responsibility for the strategic overview of learning across all Directorates. It is supported by tactical groups focusing on Custody, Public Order, Stop and Search and Professional Standards, to tackle learning on a local level.

30. The Professional Standards Department Working Group (PSDWG) is attended by Oliver Bolton from the Town Clerk's Department, representing the Sub-Committee. The Chairman of the Professional Standards and Integrity Sub-Committee attends the Integrity Standards Board for independent oversight. Any identified PSD learning issues that need to be addressed at a more strategic level are elevated to the OLF. The PSDWG also reviews the 'Learning the Lessons' bulletins issued regularly by the IOPC and ensures that lessons contained within them are addressed and disseminated across the Force. PSD also publish a quarterly Professionalism Bulletin.

31. During 2019-20, the PSDWG took the lead on a number of topics identified as areas for organisational learning, case study example:-

#### Autism Awareness training

A complaint was made following a stop by an officer who was on a bicycle who pulled alongside the driver of a vehicle and knocked on his window telling him to pull over. The motorist concerned suffers from autism and was immediately thrown into confusion as he was not aware of breaking any law. When the officer told him to pull over his options were to stop on the zig-zag lines on a pedestrian crossing or double red lines which he considered would be against the law. He told the officer he was autistic but was required to pull into a narrow cul-de-sac where he felt anxious and trapped. Complainant felt that the officer did not understand how his condition was making him feel and if the officer had communicated better the anxiousness he felt as a result could have been averted.



Learning identified:-

This incident involved a member of the public (N) who suffers from autism being required to stop by a constable in uniform. Due to his condition this immediately had an adverse effect. He is aware that stopping a motorist with autism is not an everyday occurrence for our officers he felt having brought the fact that he suffered from autism to the attention of the officer, the officer did not understand the turmoil he was now in and merely raised his voice.

The incident was prepared as a training scenario and was initially passed to Corporate Communications to raise awareness via the City of London Police intranet page. Coincidentally however an Autism Awareness Event was also being prepared for City of London Police employees. The prepared training scenario was shared and was used during the event on 25<sup>th</sup> June 2019. The Investigating Officer attended as a representative for the Professional Standards Directorate.

There is also a collaborated autism alert card in conjunction with MPS/BTP/CoLP that has just been launched, supported by the National Police Autism Association, these will be available for members of the public to carry and can provide if stopped by an officer.

Learning and development have amended their training packages to incorporate this learning. The mobile Toughpads were also uploaded with all the relevant information/guidance.

## **Criminal Investigations**

32. There have been none recorded during the reporting period.

## **Misconduct**

33. Misconduct can be categorised as being either 'misconduct' or 'gross misconduct', the latter being the more serious. Where it is determined that an officer has a case to answer, misconduct matters are heard at a misconduct meeting and gross misconduct is dealt with by means of a hearing. During the reporting period 2019/20, 7 misconduct cases were recorded within PSD. A total of 7 misconduct cases were finalised during the reporting period (some of these cases had been carried over from previous years). Currently 8 misconduct cases remain live investigations. Of the misconduct cases finalised during the reporting period the outcomes<sup>7</sup> were as follows:-

### **a) Misconduct Hearings**

Two Misconduct Hearings have been held:

In the first hearing - (IOPC independent investigation), the proceedings were stayed and the charges Not Proven.

In the second hearing (IOPC directed), – the finding was No Action against the officer.

### **b) Misconduct Meetings**

There have been no meetings held in the reporting period.

---

<sup>7</sup> Some cases involve more than one officer & those involved may receive different disciplinary outcomes

c) Management Action

In two cases there was a Case to Answer –Misconduct and the officer(s) were given formal management action. In one case there was a Case to Answer - Not misconduct.

d) No Action

In one case there was No Case to Answer, and no further action was taken against the officers.

e) Members of Police Staff

No cases involving police staff have been finalised during the reporting period. HR deal with most civilian cases due to their employment with the COL.

### **Unsatisfactory Performance Procedures (UPP)**

34. During the reporting period one Misconduct case had significant learning and the Special Constable received a UPP action plan.

### **Staffing**

35. During 2019/20 Assistant Commissioner Alistair Sutherland, continues to oversee the work of the Professional Standards Department within Business Support Directorate. The current Director of Professional Standards is D/ Supt Angie Rogers. Deputy Director Ian Younger continues his role of Misconduct and Civil Claims manager. DCI Claire Cresswell maintains her role as Deputy Director completing the Designated Appropriate Authority role, making decisions for all complaint and conduct cases.

36. The Team have settled into their offices within the New Street building. There has been a high level of staff turnover in the past year and staffing levels have often been below the recognised levels within the department. In addition business cases have been put forward and authorised for new roles within the Counter Corruption unit, Vetting and Complaints. An increase in the level of recruitment has occurred to fill these new roles and vacancies. This continues to date.

37. CoLP PSD is continuing to develop its collaboration agreement with the British Transport Police CCU PSD. The teams are co-located and internal works are being planned to allow the teams to work in a more effective office environment to support collaborative working in the future.

### **Future Governance and Regulatory Changes**

38. The final phase of the reforms to the Police Disciplinary and Complaints system went live nationally on 1st February 2020. The focus has turned extensively towards a learning culture in all but the most serious conduct cases. The Professional Standards Directorate have conducted extensive communications and guidance across the force to support these changes. A brief overview of the main changes are provided below:

39. Conduct changes:

- There will be a revised definition of misconduct – only serious breaches of the Standards of Professional Behaviour that warrant a professional taint of at least a written warning will be classed as misconduct.
- Low-level wrongdoing, mistakes & underperformance falling short of public expectations that does not warrant a professional taint of written warning will immediately leave PSD and be dealt with by line managers as Practice Requiring Improvement (PRI).

40. PRI is NOT a misconduct outcome. It is a non-adversarial process between the Participating Officer and Reviewer/ Supervisor:

- Participating officer provides an account.
- Reviewer undertakes reasonable and proportionate fact finding.
- Discussion stage – consider the whole person and their welfare.
- Reflective Review Action Report – summary and any learning actions stored in PDR.
- Safeguard – any account is not admissible if unforeseen disciplinary proceedings were to follow.

41. This form of outcome has received several encouraging reviews across the force about the positive experience it provides for all parties and the improvements seen at the end of the process.

42. There will also be improvements in transparency, cooperation and fairness. PSD will disclose terms of reference for complaints and conduct cases to the officer as standard practice. In addition, officers will receive investigation reports when there is no case to answer. A written explanation will be provided when an investigation is over 12 months – this will include steps to be taken to progress the investigation expeditiously.

43. Future outcomes

Future misconduct outcomes have been altered, they now will be: No action, refer to PRI, written warning, final written warning, dismissal without notice, and reduction in rank (this will be given if the officer is not fit to perform duties of the rank, has bought the rank into disrepute, or is unable to command). The scale of reduction is unlimited.

44. Public Complaints

- Every report of dissatisfaction will be officially logged/recorded.
- The term and process of 'Local Resolutions' will be replaced by a new process; complaints will receive a reasonable and proportionate investigation relevant to the circumstances and complaint.
- Finalisations change from 'upheld' and 'not upheld' to 'service fell short of that expected from the police service' and 'service was at a level expected from the police service'. This removes the focus from individual blame to a service delivery.

45. The Professional Standards Directorate has worked intensely to ensure that the ethos of the changes and the regulatory demands of the new reforms are fully adopted. This has been facilitated by extensive stakeholder engagement with regional and national PSD departments, the IOPC and the Professional Standards and Integrity Sub Committee members. The changes have been overwhelmingly positive for our

complainants, officers and PSD staff and we will continue to monitor the effect the new regulations have on our performance throughout the next year.

46. Moving into 2021 and beyond it may become more complex to compare complaints data due to the changes in police complaint regulations. The new changes require all expression of dissatisfaction to be recorded and they are separated into schedule 3 and non-schedule 3 complaints depending on their seriousness and how they can be resolved. The team will work on comparison data over the next reporting periods to ensure some statistical analysis and explanation is possible moving forward.
47. PSD has worked extensively to improve its capability and capacity in order to acquire 'outstanding' criteria in the HMIC Legitimacy Review. This has been achieved through the purchase of new systems, recruitment, and development of the Counter Corruption Strategy which supports learning and prevention activity. All of this should work to vastly improve the HMIC rating experienced moving into the next year and beyond. The team will continue to work with stakeholders and critical friends across the force to create the most effective PSD that it can on behalf of the force.

## **Conclusion**

48. Complaints have reduced year on year since 2017. It is hoped that this trend will continue into 2020 and beyond with increased use of practice requiring improvement. This moves away from a culture of blame for low level complaints and conduct to an environment of learning and improvement. It is known to promote better working practices and increase motivation in staff.
49. The number of complaints against police officers remains relatively low<sup>8</sup> given the high numbers of interactions with members of the public, often in challenging circumstances. A number of terrorist incidents and the perception of policing has an impact towards complaints. Covid19 will likely have an impact on the public perception on the whole of British Policing. Subsequent complaints that are received either during or after this period however, are unlikely to be reflected in the complaint data for some time.
50. CoLP have introduced Single Online Home which signposts users to a 'one stop shop' to report matters either positive/negative thus making reporting easier. Covid19 restrictions and forced increased time at home will undoubtedly have an impact on whether individuals have time to chase investigations or matters, and where they may not have complained prior to this unprecedented period.
51. The number of complex and multiple complaints and conduct matters has increased over the last number of years. There are more investigations where the IOPC are involved, (this may reflect their increase in staff levels to accept a higher case load). This IOPC involvement has an impact on the PSD investigation team.

---

<sup>8</sup> CoLP recorded 71 allegations per 1000 employees, National Average 205 allegations per 1000 employees IOPC 2019/20 Q3 – *Police Workforce, England and Wales, 31<sup>st</sup> March 2019 (National Statistics)*

52. The changes to the Police Regulations since 1<sup>st</sup> February 2020 has made the emphasis on learning both as an Organisation and Individual level the core focus. This can only enhance and reinforce the steps that PSD have already taken in this direction.
53. Following on from the success of internal communications and PSD training inputs, PSD have recruited an Engagement Officer. The Engagement officer is working extensively across the force to promulgate learning, provide training, education and advice to support our officers and staff in maintaining the highest standards of professional behaviour. PSD has seen an increase in internally referred conduct matters and requests for advice. There has been an increase in the quantity and quality of confidential anonymous reports of wrong doing to the two way reporting system 'Bad Apple', and the use of Safecall.
54. PSD record/log complaints recorded against Action Fraud – a National service - where complainants are often only seeking an update. This early resolution will not only increase confidence in the City of London Police but assist in lowering further the number of complaints recorded against the Force. However the intervention of Members of Parliament writing into the CoLP on behalf of constituents has increased dramatically over the last year and PSD recording these in an attempt to show the workload that they are generating, a further post has been created to deal with the increase workload that the Action Fraud creates.
55. Whilst the number of complaints against City of London officers is relatively low compared to the national statistics, PSD continue to look for smarter working practices to assist in dealing with complaints and conduct matters concisely, impartially and ensuring that the City of London continues to deliver an exceptional policing service.

## **Appendices**

Appendix 1- Glossary of terms

### **Contacts:**

#### **Alistair Sutherland**

*Assistant Commissioner*

*T: 020 7601 2005*

*E: [Alistair.Sutherland@city-of-london.pnn.police.uk](mailto:Alistair.Sutherland@city-of-london.pnn.police.uk)*

#### **Detective Chief Superintendent Angie Rogers**

*Head of Professional Standards*

*T: 020 7601 6945*

*E: [Angie.Rogers@city-of-london.pnn.police.uk](mailto:Angie.Rogers@city-of-london.pnn.police.uk)*