

<b>Committee(s):</b> Police Authority Board	<b>Dated:</b> 22 <sup>nd</sup> June 2021
<b>Subject:</b> Annual Report on Professional Standards Activity – 2020/21	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1
<b>Does this proposal require extra revenue and/or capital spending?</b>	N
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	N/A
<b>Report of:</b> Commissioner of Police Pol 37-21	<b>For Information</b>
<b>Report author:</b> D/Supt Dermont Robinson / PC Ann Roberts	

### Summary

This report provides a comprehensive overview of activities relating to Police Professional Standards over the year 2020/21, giving an account of both the work of your Professional Standards and Integrity Committee (PSI) and of the Force's Professional Standards Department (PSD) during this period.

Your 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'.

No Independent Office for Police Conduct (IOPC) reporting has been provided this year providing a summary of performance statistics<sup>1</sup>, this is due to recording standards changes following the implementation of the Police Misconduct Regulations 2020.

Due to the new Regulations for which there is no historical data for comparison, it is encouraged that all levels of dissatisfaction are logged. This is to enable service recovery prior to the need of a formal complaint. These are logged outside of the requirements of Schedule 3 of the Police Reform Act 2002.

Action Fraud (AF) , a national service, falls within the remit of the City of London Police and hence any complaints regarding this service are logged by the CoLP. The AF complaint data, whilst collated with CoLP data by the IOPC, is now reported separately to your PSI. The volume of AF complaints is still very low (0.07%) compared against the volume of Crime/Intelligence that the AF service records. Figures are low relative to the number of interactions with the public and to the complaint figures for other Forces.

It is to be noted that this year has been an exception due to the Global pandemic Covid 19. The interactions with members of the public are extremely diminished against previous years and subsequent years complaint data will be impacted. 8 Covid 19 related complaints were logged in the period.

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

PSD continues to improve the visibility of the department through improved internal communication and PSD training inputs across the Force. This has continued despite the pandemic.

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.

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

### **Recommendations**

That the report is received, and its contents noted.

### **Main Report**

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

1. The Professional Standards and Integrity Committee (PSI) has responsibility for providing detailed oversight of professional standards in the City of London Police. During 2020/21, 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 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 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 2020/21 the 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 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. The 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 Sutherland, 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 Committee is represented by Oliver Bolton, from the Town Clerk's Department, who attended meetings of the PSDWG in 2020/21, and the Committee received a digest of highlighted areas/themes of learning at every meeting.

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

5. Following the introduction of the Code of Ethics there was an increased focus on embedding integrity across policing. Within the City of London Police (CoLP), responsibilities regarding 'delivering' the Code of Ethics is currently arranged over 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. Reflecting the greater emphasis on professionalism and support that PSD now represents, the Force Lead role that currently sits within Strategic Development will transfer to PSD during 2021 as part of the Transform Programme changes. This also reflects moves nationally where the Code is seen as being at the core of Professional Standards Departments' work.
6. 2020-2021 was an atypical year regarding activities supporting the Code of Ethics, principally due to the impact of the Covid pandemic. City of London Police, however, has continued to deliver initiatives supporting workforce and organisational integrity, detailed below. The Chair of the Professional Standards and Integrity Committee has supported these activities as a critical friend, which helps to drive continuous improvement in this area. Amongst the things the Force has continued to deliver are:
  - A quarterly Integrity Standards Board (ISB) that is chaired by the Assistant Commissioner Sutherland and attended by the Chair 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. Only one meeting was cancelled during 2020-21 as a result of Covid. All of the other meetings continued as 'virtual' online gatherings.
  - 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 (LPCF), of which the City of London Police was a founding member. The LPCF effectively stopped meeting during the pandemic. The Metropolitan Police, who administer the LPCF has still to make a formal decision regarding the future of any London-wide group. In the interim, as founding forces, BTP and CoLP have set up their own internal panels, using their own Associates. CoLP recently ran intranet articles with a view to recruit additional associates, which was successful. The Force currently has a cadre of 22 Associates.

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

7. No HMICFRS inspections relating to integrity have taken place during 2020-21.

### Independent Office for Police Conduct (IOPC)

8. The IOPC routinely 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. All reporting from the IOPC has been delayed with no bulletins published since Q3 2019/20. The implementation of the new Police Misconduct regulations in Feb 2020 made the data sets very different to previous reporting. COVID 19 striking not long after has delayed the IOPC ability to produce their reports. They are hopeful that these will resume publication after Q1 2021/22. The IOPC acknowledge the complaints generated from Action Fraud which is a national service.
9. CoLP PSD referred 6 cases to the IOPC during 2020-21<sup>3</sup>. During the same period the total number of method of investigation (MOI) decisions by the IOPC were for 2 returned back to force for investigation decision, 2 to be locally investigated by CoLP, 2 to be independently investigated by the IOPC (these being the Westminster and Fishmonger’s Hall Fatal Police Shootings). Currently the IOPC is conducting a total of 3 independent investigations. The increased volume of independent investigations is intrinsically linked to the increase in terrorist incidents which occurred within that reporting period.

## Complaints

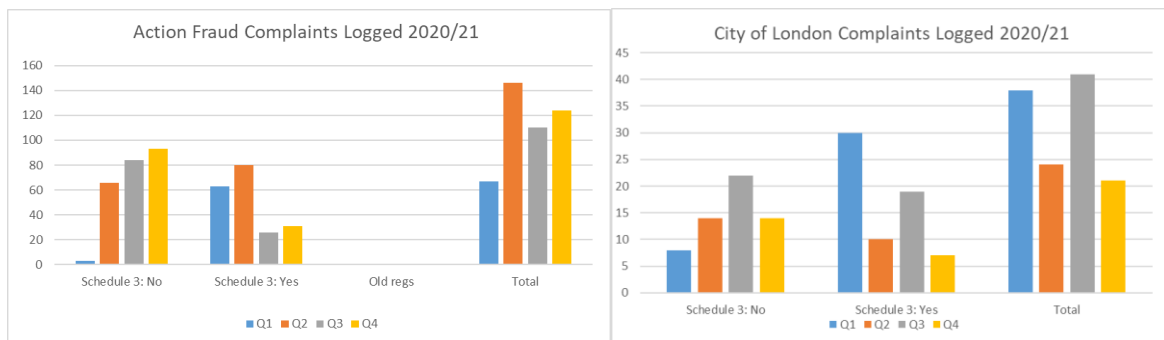
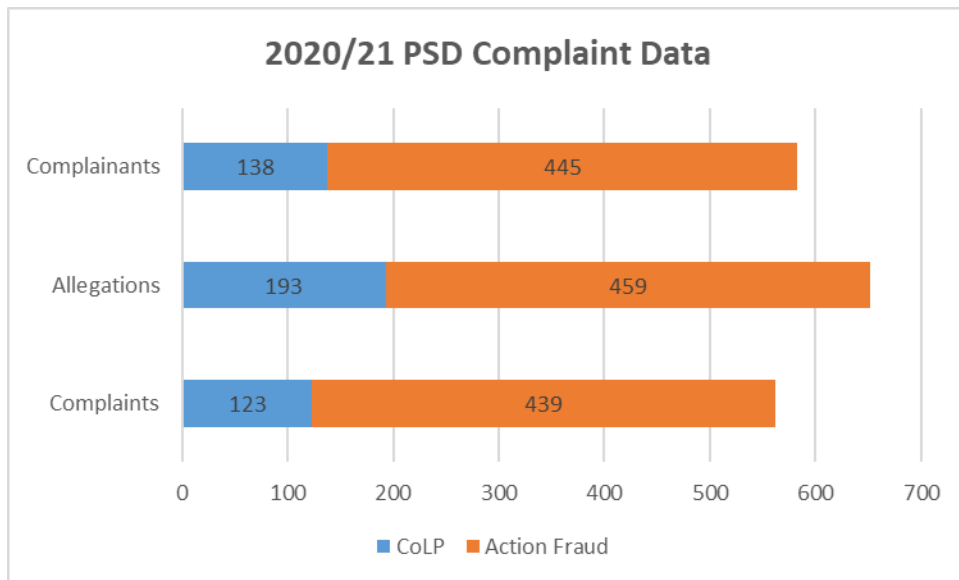
### Complaints Logged

	City of London			Action Fraud		
	Complaints	Allegations	Complainants	Complaints	Allegations	Complainants
2020/21	123	193	138	439	459	445

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

<sup>3</sup> Rolling year – some matters recorded during the previous quarter or year



10. 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).
11. The Professional Standards and Integrity committee (PSI) has received separate reporting on the AF and CoLP complaint data since September 2020. This has provided a more focused approach to the separate areas of complaints and the ability to provide other committees scrutiny of AF complaint data should it be required. This report will also provide separate AF and CoLP complaint data, although the overall volume should be considered regarding the PSD capacity. Complainant data will be collated to provide a complete representation.
12. This report contains the first full year data since the regulations (Police Complaints and Misconduct 2020) were amended. No historical data is applied as comparisons cannot be made to the previous complaint data.

13. Most AF complaints are in relation to their failure to investigate reports made to them. However, AF has no investigative responsibilities. Reports made to AF are passed to the National Fraud Intelligence Bureau (NFIB) for their assessment, and potential dissemination to local forces, for them to consider an investigation. NFIB has no investigative responsibilities. Given the vast amount of reports received, circa 45,000 per month, and finite resources within NFIB, a strict review assessment case criteria is in place.
14. The NFIB are operationally independent, and there is no mechanism within the complaints arena to overturn decisions made by the NFIB or local police forces. To manage potential complainant's expectations, the AF website has been updated to provide relevant information, and correspondence has also been updated. A PSD and NFIB Working Group has been re-established to discuss key threads of complaints, and action that can be taken to address them, to better manage reporter's expectations, and in doing so, reduce complaints. Since these measures have been put in place, PSD has seen a 10% decrease in AF complaints within the previous quarter.
15. To increase service delivery and service recovery, a key drive within PSD's AF Team is to locally resolve AF complaints, where appropriate to do so, outside of schedule 3. In doing so, the team now provide prevention advice and details of relevant partners and stakeholders that may be better placed to address their complaint and recovery of lost money. This appears to be well received, resulting in many cases being resolved.
16. There are a handful of AF complainants that fit into the category of an "unreasonable complainant". Such complainant's have unrealistic expectations of the outcome of their complaint, and an unrealistic expectation of what law enforcement agencies should be responsible to investigate. At this time, a majority of unreasonable complainants are in relation to AF's business area within PSD, and can be resource intensive to deal with.
17. The volume of recorded Action Fraud complaints is extremely low compared to the number of fraud reports to Action Fraud. 2020/21 complaint figures represent 0.07% of all Action Fraud reports received in the same period.
18. Members of Parliament who write in on behalf of a constituents have been 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 is explained to them. MP's cannot make a complaint on their behalf.

#### Allegations Recorded

19. The City of London saw a total of 193 allegations recorded in 2020/2021. In terms of nature of allegations, the *highest* categories were:

<b>ALLEGATION TYPE</b>	<b>Total</b>	<b>Percentage</b>
A4. General level of service	26	13%
H3. Unprofessional attitude and disrespect	18	9%
A2. Decisions	15	8%
B4. Use of force	15	8%
L1. Other	13	7%
B9. Other policies and procedures	12	6%

20. Action Fraud saw a total of 459 allegations recorded in 2020/21. In terms of nature of allegations, the breakdown was as follows: -

<b>Type of Allegations</b>	<b>Total</b>	<b>Percentage</b>
A2. Decisions	332	72%
A4. General level of service	75	16%
A3. Information	23	5%
L1. Other	20	4%
B9. Other policies and procedures	3	0.70%
03. General policing standards	3	0.70%
A1. Police action following contact	2	0.40%
04. Operational management decisions	1	0.20%

21.2020/21 City of London Police complaint data accounts for 22% of the total cases logged. Action Fraud cases formed the majority at 78%. This is similar comparative percentages to data in 2019/20.

22.General level of Service and Decisions allegations are almost all relating to Organisational type complaints or dissatisfaction. (General Policing Standards\* and Operational management decisions \*old regulation allegation types pre 01/02/20). When this relates to AF allegations this is often customer expectation and the decisions around investigation.

23. Other than the Organisational decision allegations, the CoLP have seen Unprofessional Attitude and Use of Force return as the highest allegation type(s).

However, these are very low at 9% and 8% respectively. With the use of Body Worn Video (BWV) most allegations are not substantiated. Many of these allegations are surrounding perceived communication skills. All these allegation types, where possible, have learning disseminated, or where Reflective Practise has been utilised. The effective use of Body Worn Cameras has been instrumental in the investigation of such recorded complaints and the outcomes.

24. There were 11 allegations of “discriminatory behaviour” recorded during 2020/21; these sub categorise into 10 Race, 1 Religion. Of this allegation type all 11 were finalised<sup>4</sup> following a PSD investigation, with outcomes as follows: 7 ‘service provided was acceptable’, 1 ‘service provided was not acceptable’ where the officer was subject of PRI, 1 allegation was ‘not upheld’, 1 was Locally Resolved, 1 Resolved. All related to CoLP.

### Finalised Allegations

25. In the last year PSD finalised a total of 214 allegations relating to the City of London Police. From the allegations finalised a total of 1 (0.5%) was Upheld (old regulations) and 14 (7%) where the ‘Service provided was Not Acceptable’. Most CoLP complaint cases (69%) were finalised with 30 days.

*Table shows highest Allegation categories finalised.*

	Local Resolution - by PSD	No further action required	Not Resolved - NFA	Not Upheld - by PSD	Resolved	The service provided was acceptable	The service provided was not acceptable	Upheld - by PSD	Withdrawn	Total
A2. Decisions	0	2	0	0	2	10	1	0	2	17
A4. General level of service	0	1	0	0	10	9	1	0	3	24
B4. Use of force	0	0	1	0	1	10	0	0	1	13
B9. Other policies and	0	0	0	0	3	9	1	0	0	13
H3. Unprofessional attitude and disrespect	0	1	0	0	5	8	5	0	0	19
L1. Other	0	1	1	0	6	3	1	0	0	12

<sup>4</sup> The finalised allegations are from a rolling period therefore may not be cases recorded in the same year. Some finalised under the old regulations if recorded pre-Feb 2020.



26. 517 Action Fraud related allegations were finalised during the period. From the allegations finalised a total of 1 (0.2%) where the 'Service provided was Not Acceptable'. Virtually all AF complaint cases (99%) were finalised with 30 days.

*Table shows highest Allegation categories finalised*

	Local Resolution - by PSD	No further action required	Not Resolved - NFA	Not Upheld - by PSD	Resolved	The service provided was acceptable	The service provided was not acceptable	Withdrawn	Withdrawn - by Force	Total
A2. Decisions	0	42	3	0	173	115	1	1	0	335
A3. Information	0	1	0	0	20	2	0	0	0	23
A4. General level of service	0	28	2	0	18	49	0	1	0	98
L1. Other	0	0	0	0	19	1	0	0	0	20
03. General policing standards (previous regulations)	30	0	0	1	0	0	0	0	1	32

## Complainant Characteristics

### *Ethnicity*

27. 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 and this has been recognised as being a National issue for policing. PSD will work with CoLP subject matter experts and the CoLP E&I Board to explore opportunities to improve data collection and encourage complainants to provide the relevant data. The ethnicity is classed as unknown for 252 out of the total 583 complainants (43%), an additional 30 either did not or preferred not to state their ethnicity. The highest category recorded is White British, 191 complainants have self-defined their ethnicity within this group (33%). These are similar statistics to previous years, and similar to other Forces in previous years.

### *Gender and age*

28. A total of 583 complainants were recorded in 2020/21. Of these 391 stated they were male, 136 female and 55 where gender is recorded as unknown. Most complainants do not state age, but from what the Force has recorded, the highest category is 40-49 years of age with 108 (19%). This is the same age group and percentage as the previous year. Of the other age groups complaints were evenly spread across all ages where provided. 141 complainants provided no data (24%).

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

29. 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 PSD Engagement Officer has established excellent relationships throughout the Force during this period, continuing to connect PSD with the Force, sharing learning throughout the pandemic using new technology the Force has invested in. Reflective Practise has been immersed as a part of the learning culture the Regulations encourage. The Organisational Learning Forum (OLF) chaired by AC Sutherland, is well established, has been operating for several years and meets on a quarterly basis. Virtual meetings have been held during the Covid 19 pandemic.
30. 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.
31. The Professional Standards Department Working Group (PSDWG) is attended by Oliver Bolton from the Town Clerk's Department, representing the Committee. The Chairman of the Professional Standards and Integrity 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 publish a quarterly Professionalism Bulletin which is emailed to all members of the Force.

## **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 2020/21, 7 misconduct cases were recorded within PSD. A total of 8 misconduct cases were finalised during the reporting period (some of these cases had been carried over from previous years). Of the misconduct cases finalised during the reporting period the outcomes<sup>5</sup> were as follows:-

### **a) Misconduct Hearings**

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<sup>5</sup> Some cases involve more than one officer & those involved may receive different disciplinary outcomes

One Special Case Hearing has been held:

A probationary officer who had Resigned prior to proceedings was Dismissed without Notice. The officer is now subject of the Barred list.

b) Misconduct Meetings

There have been no meetings held in the reporting period.

c) Management Action

None given.

d) Reflective Practise

Two cases finalised where the officers were referred to Reflective Practise.

e) No Action

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

f) Members of Police Staff

Two cases involving police staff have been finalised during the reporting period. HR deal with most civilian cases due to their employment with the COL. In one case there was a finding for a member of staff who was given formal management action. One member of staff was Dismissed.

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

34. During the reporting period no cases were recorded.

### **Staffing**

35. During 2020/21 Assistant Commissioner Sutherland, continued to oversee the work of the Professional Standards Department. The current Director of Professional Standards is D/ Supt Dermont Robinson who commenced this role in May 2021. 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 has settled into their offices within the New Street building, however all staff have worked from home during the pandemic whilst retaining the high level of professionalism required from the department. 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. This was in part due to one of the DCs within Complaints and Misconduct (50% of team) being off on long-term sickness for several months and subsequently retiring. This post was partly bridged through the recruitment of an agency worker. Capability has also been affected by the requirement to recruit a DC to replace the officer who retired and also a further DC who was successful in the promotion process. It is recognised that the training of new DCs into this role takes several months to achieve competency due to this being a complex and unique area of policing. Therefore, it is anticipated that in the short-medium term there may

be a capability lag in dealing with cases. In part, any such lag can be accommodated by the newly established Inquest Team which consists of 1 DS and 1 DC. Although they are currently dedicated to the Fishmonger's Hall Inquest and will subsequently move onto the Westminster Inquest; the absence of relevant incidents during the Covid-19 pandemic has meant that there will be some additional capacity to support other teams within PSD if required.

37. CoLP PSD is continuing to develop its collaboration agreement with the British Transport Police Counter Corruption Unit (CCU) PSD. The teams are co-located and internal works have been completed 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 has conducted extensive communications and guidance across the force to support these changes. A brief overview of the main changes are provided below:

Conduct changes:

- There is 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. Gross Misconduct has a threshold of misconduct which could justify dismissal.
- Low-level wrongdoing, mistakes & underperformance falling short of public expectations that does not warrant a professional taint of written warning are being dealt with by line managers as Practice Requiring Improvement (PRI).

39. 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.

40. This form of outcome continues to receive 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. PSD monitor the outcomes from all PRI across the Force.

41. It is anticipated there will 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.

## Public Complaints

42. Every report of dissatisfaction is logged subject to initial handling, and if required, assessed for formal recording under Schedule 3, for reasonable and proportion resolution or investigation.

- Complaints recorded under Schedule 3 have a right of review. Depending on the seriousness of the allegations this is either the City of London Corporation (Common Council) as the Local Policing Body for less serious complaints – which is generally those resolved other than by investigation. The IOPC will be the review body for the more serious complaints that are fully investigated.

- Finalisations have changed 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 in non-conduct matters.

## Initial Handling of Public Complaints

43. When an expression of dissatisfaction is logged it is initially handled by the customer service/service recovery team who contact the complainant to ensure that we understand the complaint and discuss how the complaint can be resolved. This approach often results in service recovery and complaints being satisfactorily resolved without formal recording under Schedule 3. This has been particularly successful in dealing with Action Fraud complainants and in reducing the number of complaints that have been formally recorded.

44. 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 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.

45. It is proving to be more complex to compare complaints data due to the changes in police complaint regulations. This is recognised by the IOPC in their quarterly reports. The team continues to work on comparison data over the next reporting periods to ensure some statistical analysis and explanation is possible moving forward.

46. PSD has worked extensively to improve its capability and capacity in order to improve our grading in the HMICFRS Legitimacy Review. This is supported 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 HMICFRS 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.

47. As advised above, all expressions of dissatisfaction in relation to AF are recorded within PSD, in line with IOPC's statutory guidance.

## **Conclusion**

48. This year is an anomaly in relation to both the data and the pandemic, and both need to be considered in the year ahead. Historic complaint data is in its infancy with one years data under the new regulations, so will provide the forthcoming period limited comparisons, however the Covid 19 pandemic has had an impact on Policing interactions over the past year and as such will have a negative impact comparing subsequent complaint periods in the future. With increased use of practice requiring improvement and the 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 logging of a higher volume of complaint data should potentially not be seen in the future as a negative, but how to strive to provide a learning and progressive Police Service, with effective engagement with both staff and members of the public.

50. The number of complaints against police officers remains relatively low<sup>6</sup> given the number of interactions with members of the public, often in challenging circumstances. Covid 19, Black Lives Matter and the murder of Sarah Everard will likely have an impact on the public perception on the whole of British Policing and how the public view the world following the publicity of these high-profile issues. This will have an impact regarding complaints and conduct matters.

51. CoLP has adopted Single Online Home which signposts users to a 'one stop shop' to report matters either positive/negative thus making reporting easier.

52. 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 involvement has an impact on the PSD investigation team as a result of the increased demand for information from the IOPC.

53. 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 has already taken in this direction.

54. Following on from the success of internal communications and PSD training inputs, PSD has 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

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<sup>6</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)*

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.

55. Whilst the number of complaints against City of London officers is relatively low, 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

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