

# Police Complaints Information Bulletin

Appropriate Authority: City of London

Reporting Period: 01 April 2022 - 30 September 2022 (Q2 2022/23)



Most Similar Force (MSF) Group:

## About this bulletin

This bulletin presents information about complaints defined under the Police Reform Act 2002 (PRA 2002), as amended by the Police and Crime Act 2017. The legislation came into effect on 1 February 2020 (4 January 2021 for the British Transport Police). It sets out performance against a number of measures and compares force results to their most similar force (MSF) group and with the overall result for all forces (national).

## Changes since the previous bulletin

**Sections B1 and B2:** These have been removed from this bulletin as we are working with our ICT department to improve this data.

**Section D3:** Following feedback from forces, this section now includes number of LPB reviews completed as well as the percentages. We are working with our ICT department to add number of IOPC reviews completed to future bulletins.

**Sections E1.2** Misconduct proceedings are only applicable to complaint cases which are investigated and subject to Special Procedures. A further table has been added to show misconduct proceedings, UPP and RPRP on these cases only.

**Section E2** has been removed as the data is now included in section E1.2

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Notes

## Acronyms used in this bulletin

**Force** – year to date force numbers

**IOPC** – Independent Office for Police Conduct

**Inc.** – including

**Ind** – independent investigation

**Loc** – local investigation

**LPB** – local policing body

**MSF** – most similar force

**Nat.** – national

**No.** – number

**PRA** – the *Police Reform Act 2002*

**RPRP** – reflective practice review process

**SPLY** - Same period last year

**UPP** – unsatisfactory performance procedure

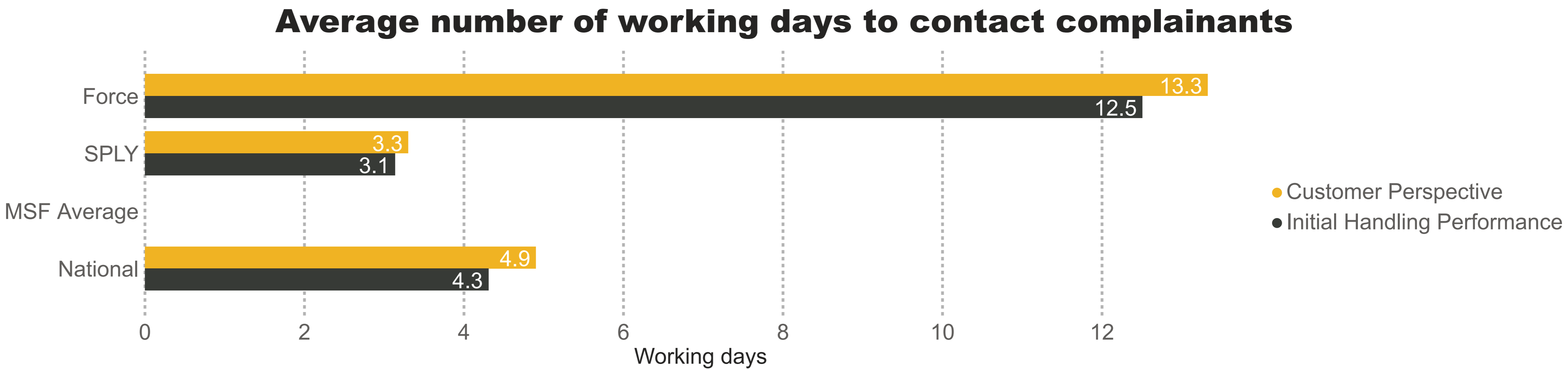
Section A1.1: Complaint cases logged and initial handling

This section presents information relating to the force’s contact with customers and their initial handling of the complaint cases. It shows how long, on average, it takes from the customer’s perspective from when they made the complaint and the force’s performance of the initial handling from when it received the complaint.

Complaint cases with ‘invalid dates’ have been removed from timeliness measures. Please refer to the performance framework counting rules and calculations on the [IOPC website](#) for explanations of customer perspective, initial handling and invalid dates.

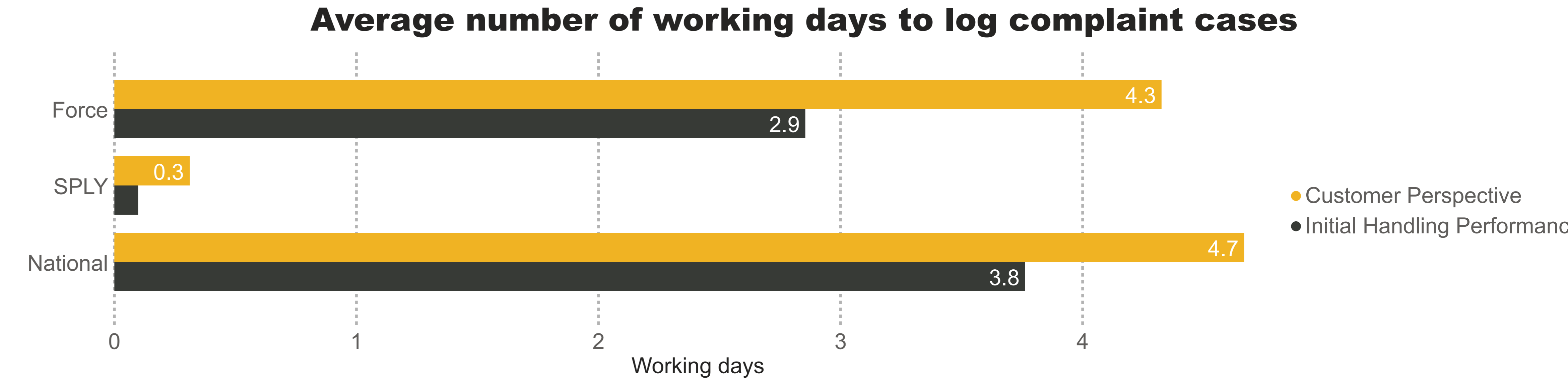
To contact complainants

Average number of working days...	Customer perspective	Initial handling performance
Force	13	13
SPLY	3	3
National	5	4



To log complaint cases

Average number of working days...	Customer perspective	Initial handling performance
Force	4	3
SPLY	0	0
National	5	4



Please note: average times presented in the above tables are rounded to the nearest whole number. In comparison, the charts present the exact result.

Complaint cases logged

	Force	SPLY	MSF Average	National
Complaint cases logged	261	245		40,738
No. of complaint cases logged per 1,000 employees	180	170		165

Reasons complaint cases are recorded under Schedule 3 of the PRA 2002

The below table presents the number of complaint cases handled under Schedule 3 of the PRA 2002 (formal handling) and the reasons why.

Reason complaint case recorded under Schedule 3	Force		SPLY		MSF Average		National	
	No.	%	No.	%	No.	%	No.	%
AA/body responsible for initial handling decides	16	39 %	51	74 %			6,376	42 %
Complainant wishes the complaint be recorded	0	0 %	5	7 %			3,661	24 %
Dissatisfaction after initial handling	22	54 %	7	10 %			2,266	15 %
Nature of the allegation(s) in the complaint	3	7 %	6	9 %			2,986	20 %

Section A1.2: Allegations logged - what has been complained about

This section presents information that shows what people complain about. Allegation categories capture the root of the dissatisfaction expressed in a complaint. A complaint case will contain one or more allegations and one category is selected for each allegation logged.

Please refer to our [Guidance on capturing data about police complaints](#) for guidance on logging allegations and complaint category definitions.

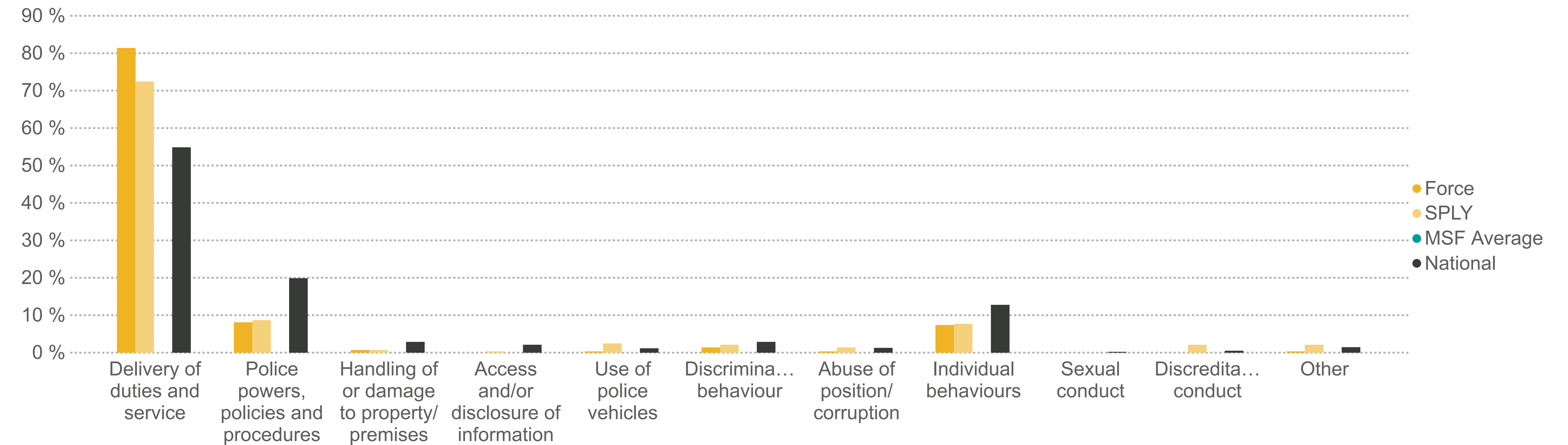
Due to some allegations not having a recorded category, the totals differ in the two tables.

Allegations logged

	Force	SPLY	MSF Average	National
Allegations Logged	285	287		64,261
No. of allegations logged per 1,000 employees	197	199		261

What has been complained about

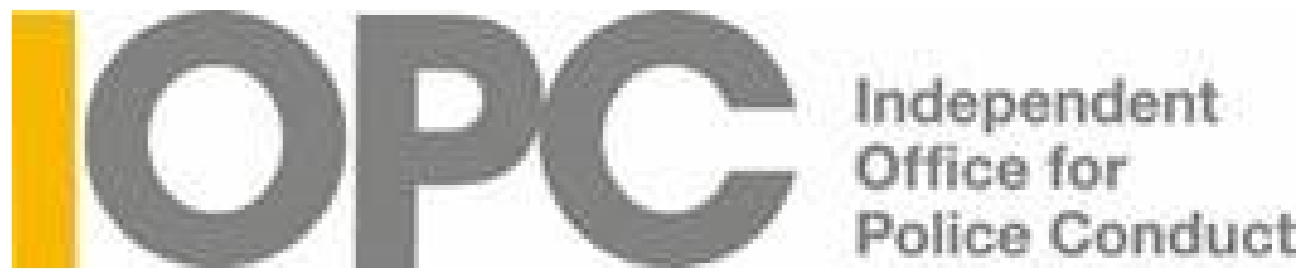
	Delivery of duties and service	Police powers, policies and procedures	Handling of or damage to property/ premises	Access and/or disclosure of information	Use of police vehicles	Discriminatory behaviour	Abuse of position/ corruption	Individual behaviours	Sexual conduct	Discreditable conduct	Other	Total
Force	232	23	2	0	1	4	1	21	0	0	1	285
SPLY	208	25	2	1	7	6	4	22	0	6	6	287
MSF Average												
National	35,253	12,788	1,856	1,353	726	1,841	811	8,215	121	307	951	64,222
Force	81 %	8 %	1 %	0 %	0 %	1 %	0 %	7 %	0 %	0 %	0 %	100 %
SPLY	72 %	9 %	1 %	0 %	2 %	2 %	1 %	8 %	0 %	2 %	2 %	100 %
MSF Average												
National	55 %	20 %	3 %	2 %	1 %	3 %	1 %	13 %	0 %	0 %	1 %	100 %



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Section A1.3: Allegations logged – what has been complained about – top five allegation categories and their subcategories

Category	Subcategory	Force		SPLY		National	
		No.	%	No.	%	No.	%
Delivery of duties and service	Total	232	81 %	208	72 %	35,253	55 %
	Police action following contact	130	56 %	4	2 %	16,077	46 %
	Decisions	34	15 %	155	75 %	4,303	12 %
	General level of service	37	16 %	42	20 %	11,726	33 %
	Information	31	13 %	7	3 %	3,147	9 %
Police powers, policies and procedures	Total	23	8 %	25	9 %	12,788	20 %
	Stops, and stop and search	1	4 %	5	20 %	735	6 %
	Searches of premises and seizure of property	7	30 %	1	4 %	1,637	13 %
	Power to arrest and detain	6	26 %	3	12 %	2,013	16 %
	Detention in police custody	2	9 %	2	8 %	1,709	13 %
	Bail, identification and interview procedures	1	4 %	0	0 %	529	4 %
	Use of force	4	17 %	6	24 %	3,566	28 %
	Evidential procedures	0	0 %	1	4 %	942	7 %
	Out of court disposals	0	0 %	1	4 %	183	1 %
	Other policies and procedures	2	9 %	6	24 %	1,473	12 %
	Use of police systems	0	0 %	0	0 %	1	0 %
	Impolite and intolerant actions	0	0 %	0	0 %	0	0 %
Handling of or damage to property/ premises	Total	2	1 %	2	1 %	1,752	3 %
	Handling of or damage to property/ premises	2	100 %	2	100 %	1,752	94 %
Discriminatory behaviour	Total	4	1 %	6	2 %	1,841	3 %
	Age	0	0 %	0	0 %	13	1 %
	Disability	1	25 %	2	33 %	299	16 %
	Gender reassignment	0	0 %	0	0 %	22	1 %
	Marriage and civil partnership	0	0 %	0	0 %	3	0 %
	Pregnancy and maternity	0	0 %	0	0 %	2	0 %
	Race	3	75 %	4	67 %	1,037	56 %
	Religion or belief	0	0 %	0	0 %	41	2 %
	Sex	0	0 %	0	0 %	243	13 %
	Sexual orientation	0	0 %	0	0 %	47	3 %
	Other	0	0 %	0	0 %	134	7 %
Individual behaviours	Total	21	7 %	22	8 %	8,214	13 %
	Unprofessional attitude and disrespect	17	81 %	13	59 %	2,375	29 %
	Lack of fairness and impartiality	0	0 %	0	0 %	1,303	16 %
	Overbearing or harassing behaviours	2	10 %	4	18 %	1,390	17 %
	Impolite language / tone	2	10 %	1	5 %	2,188	27 %
	Impolite and intolerant actions	0	0 %	4	18 %	958	12 %

This section presents the five most commonly recorded categories for allegations that have been logged.

A complaint case will contain one or more allegations and one category (and sub-category, where available) is selected for each allegation logged.

Total % is of the total number of allegations logged.

Where the subcategory is 'None', this has been excluded from this table. For full counts please see section A1.2

Section A1.4: Allegations logged – What has been complained about (category) and the situational context of complaints (factors)

Allegation category												
Factors	Delivery of duties and service	Police powers, policies and procedures	Handling of or damage to property/ premises	Access and/or disclosure of information	Use of police vehicles	Discriminatory behaviour	Abuse of position/ corruption	Individual behaviours	Sexual conduct	Discreditable conduct	Other	Total
Arrest	1	8	0	0	0	0	0	1	0	0	0	10
Custody	1	1	0	0	0	0	0	0	0	0	0	2
Fraud	206	0	0	0	0	1	0	7	0	0	0	214
Investigation	4	0	0	0	0	0	0	0	0	0	0	4
Neighbourhood policing	6	0	0	0	0	0	0	1	0	0	0	7
None	13	12	2	0	0	2	1	11	0	0	1	42
Restraint equipment	0	1	0	0	0	0	0	0	0	0	0	1
Roads/traffic	1	0	0	0	1	1	0	1	0	0	0	4
Stop and/or search	0	1	0	0	0	0	0	0	0	0	0	1

This section presents information that shows what people are complaining about using a combination of allegation categories and factors. Categories capture the root of the dissatisfaction expressed in a complaint. Factors capture the situational context of the dissatisfaction expressed in a complaint. The combination of categories and factors provides a richer picture of what people are complaining about compared to the categories alone.

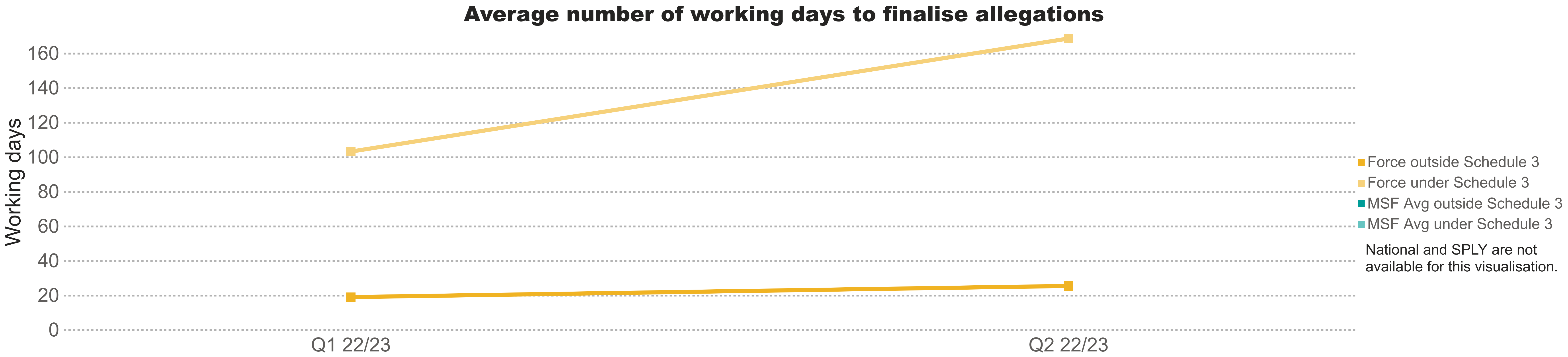
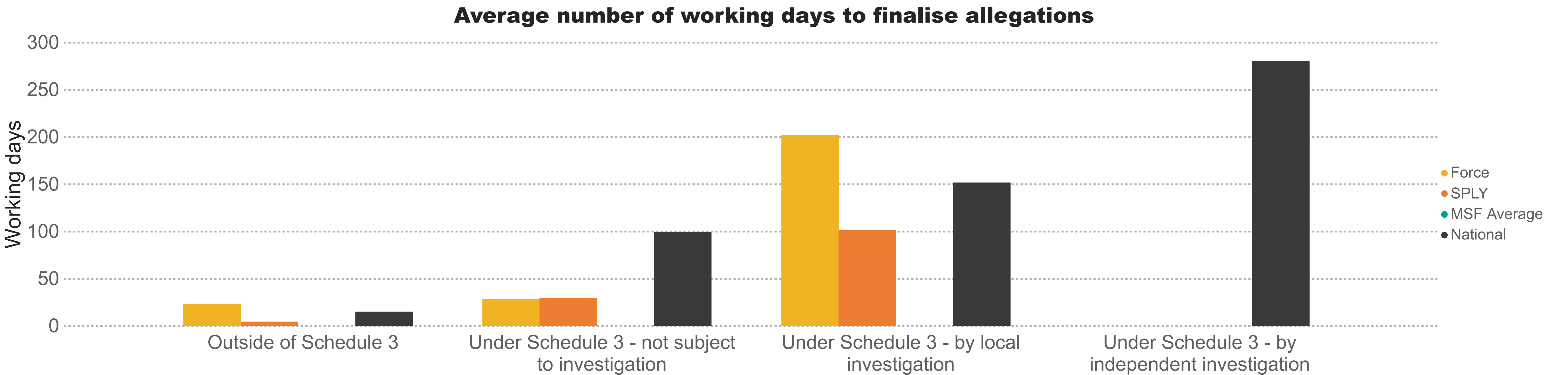
Each allegation should have a single category selected. However, multiple factors can be selected on a single allegation. Therefore, the sum of factors will not equal the total allegations logged in each category. Please refer to our [Guidance on capturing data about police complaints](#) for definitions of categories and factors.

Section A2: Allegations timeliness

Average number of working days to finalise allegations	Force	SPLY	MSF Average	National
Outside of Schedule 3	23	5		15
Under Schedule 3 - not subject to investigation	28	30		100
Under Schedule 3 - by local investigation	202	102		152
Under Schedule 3 - by directed investigation	0	0		455
Under Schedule 3 - by independent investigation	0	0		281

This section presents the time it takes the force to finalise allegations by how they were handled. It gives a breakdown of allegations handled informally outside of Schedule 3 and those that were handled formally by either by investigation or handled other than by investigation. Timeliness is calculated from the date the allegation was received by the force.

Allegations with 'invalid dates' have been removed from the data shown. Please refer to the performance framework counting rules and calculations on the [IOPC website](#) for an explanation of invalid dates.



Section A3.1: How allegations were handled and their decisions

This section presents a breakdown of how allegations were handled information and the decisions being given. An allegation decision is logged for each allegation finalised.

The allegation decision reflects how the complaint case has been handled, with different decisions available for the different means of handling. Both the allegation decisions and the subsequent actions available will depend on two things: firstly, whether the complaint case has been handled outside or under Schedule 3; and secondly, the means of handling where it has been dealt with under Schedule 3.

Please refer to our [Guidance on capturing data about police complaints](#) for details of allegation decisions.

How allegations were handled	Force No.	Force %	MSF Average No.	MSF Average %	National No.	National %
Under Schedule 3 investigated (not subject to special procedures)	19	8 %			6,990	11 %
Under Schedule 3 investigated (subject to special procedures)	5	2 %			648	1 %
Under Schedule 3 - not investigated	16	7 %			25,901	42 %
Outside of Schedule 3	192	83 %			27,978	45 %
Total	232	100 %			61,517	100 %

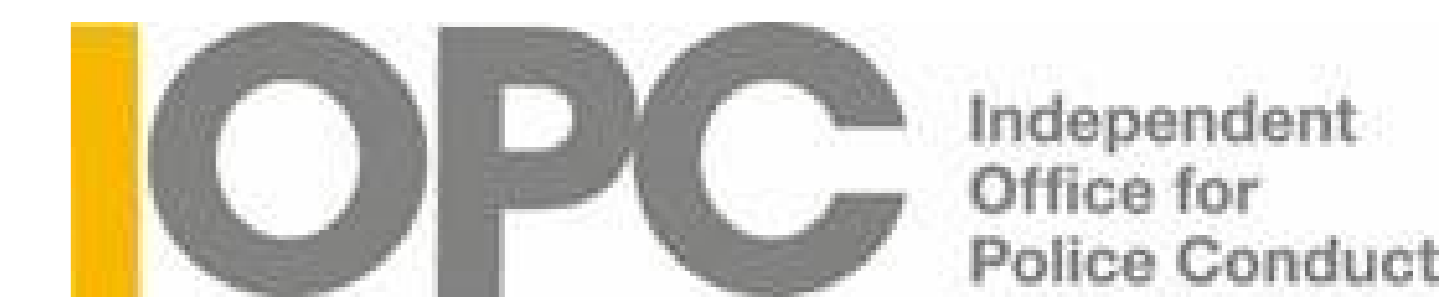
Please note that figures presented in these tables may be under-representing the number of allegations finalised under Schedule 3 and investigated (not subject to special procedures), instead grouping some of these allegations as finalised under Schedule 3 and not investigated. This is because police forces were not able to consistently and accurately collect this data on their systems until the implementation of an upgrade from November 2020.

How allegations were handled	Outside of Schedule 3				Under Schedule 3 - not investigated				Under Schedule 3 investigated (subject to special procedures)				Under Schedule 3 investigated (not subject to special procedures)			
Allegation decision	Force %	Force No.	Nat. %	Nat. No.	Force %	Force No.	Nat. %	Nat. No.	Force %	Force No.	Nat. %	Nat. No.	Force %	Force No.	Nat. %	Nat. No.
No further action					6 %	1	9 %	2,297			1 %	5	16 %	3	7 %	491
Regulation 41 applies							0 %	29							1 %	61
Service provided - unable to determine							6 %	1,665			0 %	3			5 %	351
Service provided - not acceptable					6 %	1	14 %	3,521			4 %	23	32 %	6	12 %	812
Service provided - acceptable					88 %	14	66 %	17,149	20 %	1	16 %	102	47 %	9	73 %	5,073
Not Resolved			9 %	2,470												
Resolved	100 %	192	91 %	25,507												
No Case to Answer									20 %	1	55 %	356				
Case to Answer									60 %	3	23 %	150				
Withdrawal							5 %	1,236			1 %	9	5 %	1	3 %	202
Total	83 %	192	45 %	27,977	7 %	16	42 %	25,897	2 %	5	1 %	648	8 %	19	11 %	6,990

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### Section A3.2: Allegation decisions by what was complained about (category)

This section presents information about allegations handled both informally and formally, grouped by the allegation decision and the category selected on each allegation. Each allegation has a single category selected.

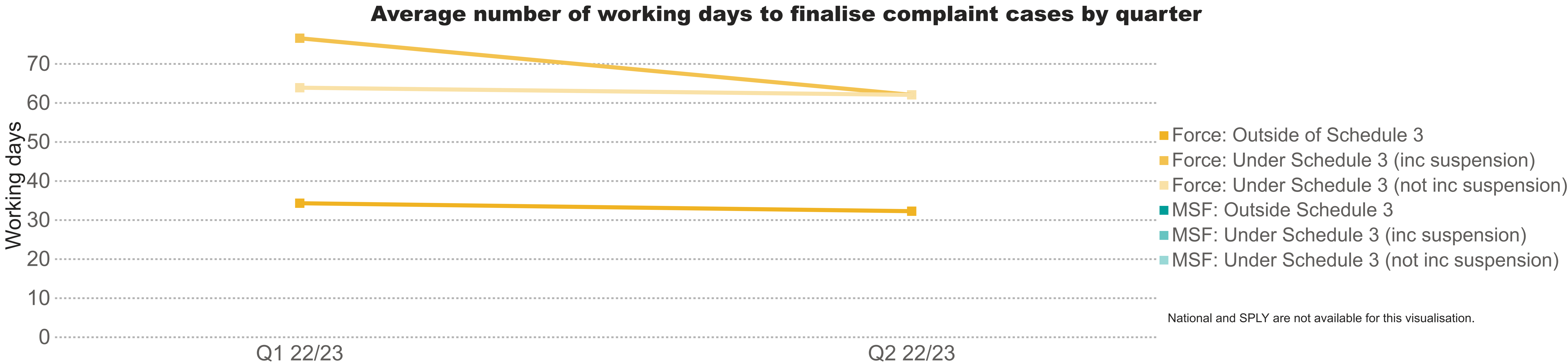
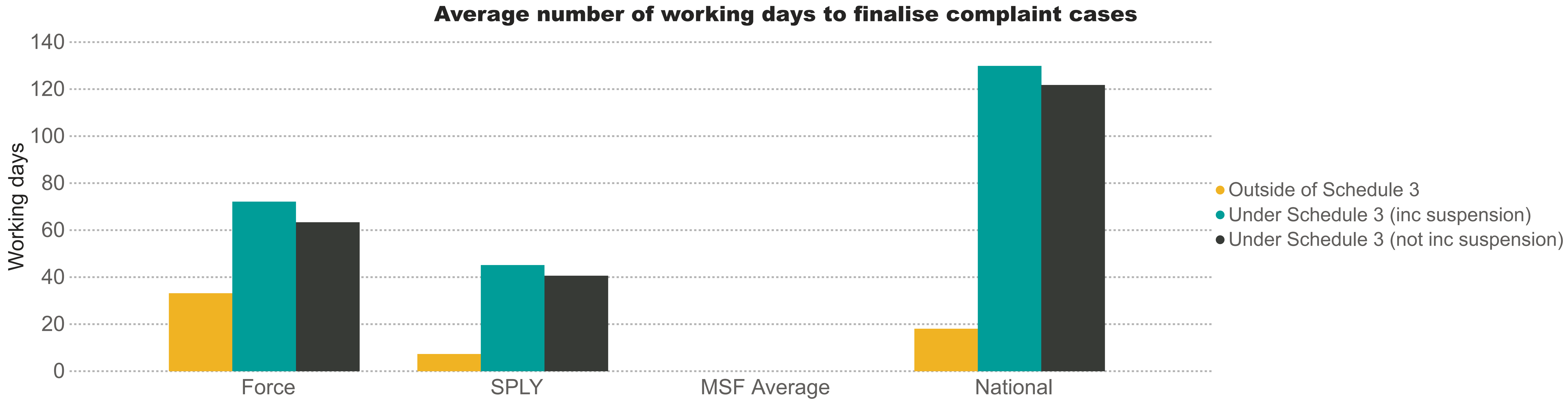
[illegible]

Section A4: Complaint cases finalised - timeliness

Average number of working days to finalise complaint cases	Force	SPLY	MSF Average	National
Outside of Schedule 3	33	7		18
Under Schedule 3 (inc suspension)	72	45		130
Under Schedule 3 (not inc suspension)	63	41		122

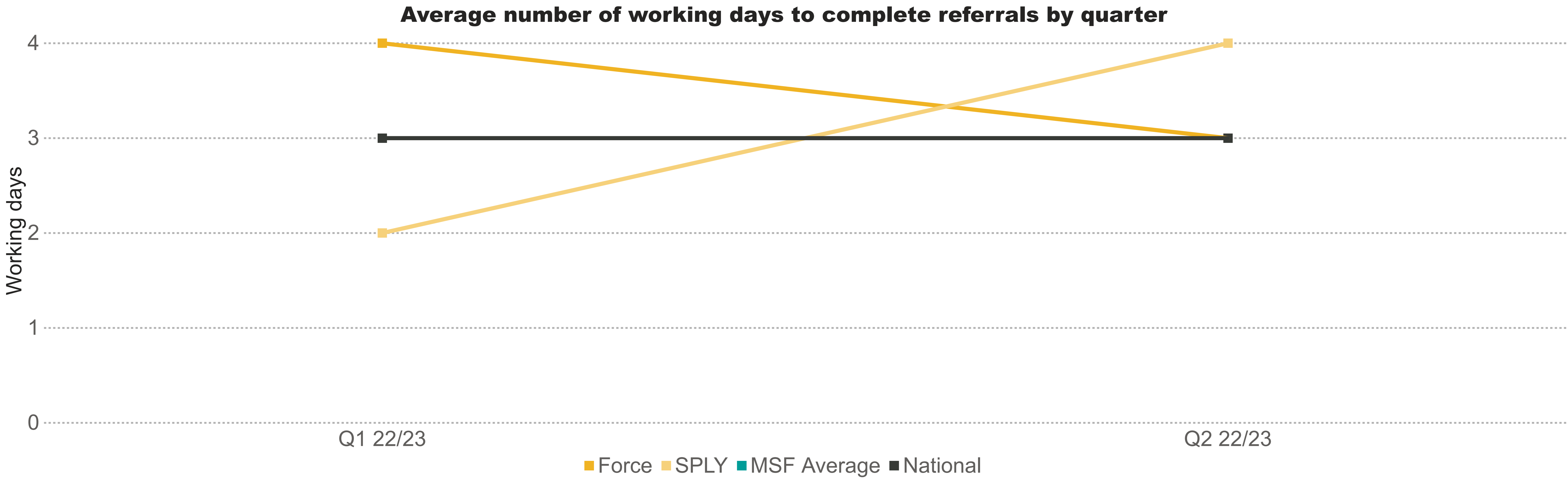
This section shows the time it takes the force to finalise complaint cases from the customer's perspective. It gives a breakdown of the time taken to finalise complaint cases handled informally and those that are handled formally under Schedule 3. Timeliness is calculated from the date the complaint was made.

Complaint cases with 'invalid dates' have been removed from the data shown. Please refer to the [IOPC website](#) performance framework counting rules and calculations on the for an explanation of invalid dates.



Section C: Referrals

	Force	Force %	SPLY	MSF Average	MSF Average %	National	National %
Number referrals received	13		9			2,855	
Number referrals completed	13		9			2,875	
Decision: Independent Investigation	3	23%	0			211	7%
Decision: Directed Investigation	0	0%	0			21	1%
Decision: Local Investigation	10	77%	6			1,791	62%
Decision: Return to Force	0	0%	3			820	29%
Decision: Invalid	0	0%	0			30	1%



The figures presented in this section include all referrals that the force makes to the IOPC (received), not just those arising from complaints.

When the IOPC receives a referral from the force, it reviews the information they have provided. The IOPC decides whether the matter requires an investigation, and the type of investigation. Referrals may have been completed in a different period to when they were received.

Where a referral is made by the force on a mandatory basis but does not meet the mandatory referral criteria, the matter may not fall within the IOPC’s remit to assess and will be determined invalid.

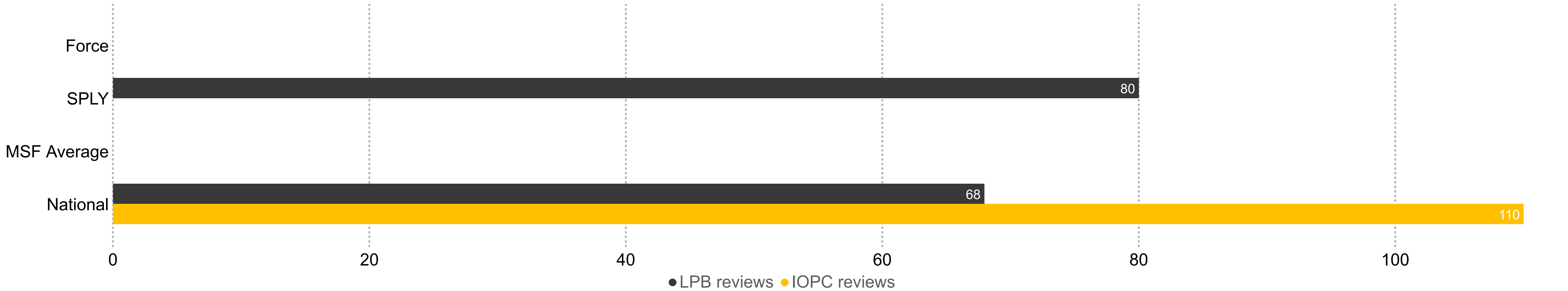
The sum of decisions may not match the number of referrals completed. This is because some matters referred may have come to the attention of the appropriate authority before 1 February 2020 and have investigation type decisions of either managed or supervised.

Section D1: Reviews received

.	Complaint cases finalised under Schedule 3	Reviews received	Reviews received as proportion of complaint cases finalised under Schedule 3	Number LPB reviews received - investigation	Number LPB reviews received - non-investigation	Number IOPC reviews received - investigation	Number IOPC reviews received - non-investigation
Force	46	4	9 %	0	2	1	1
SPLY	65	6	9 %	0	4	1	1
MSF Average							
National	14,796	3,137	21 %	124	2,025	396	592

Section D2: Reviews timeliness

	Force	SPLY	MSF Average	National
Average number of working days to complete Local Policing Body reviews	0	80		68
Average number of working days to complete IOPC reviews	0	0		110



Where a complaint has been recorded under Schedule 3 to the *Police Reform Act 2002*, the complainant has a right to apply for a review. A person can apply for review if they are unhappy with the way their complaint was handled, or with the outcome. This applies whether the complaint has been investigated by the appropriate authority or handled otherwise than by investigation (non-investigation). The application for a review will be considered either by the local policing body or the IOPC; the relevant review body depends on the circumstances of the complaint.

This section presents information about applications for review handled by both local policing bodies and the IOPC.

Information about the right of review and who is the relevant review body is available in [chapter 18 of the IOPC’s Statutory Guidance on the police complaints system \(February 2020\)](#).

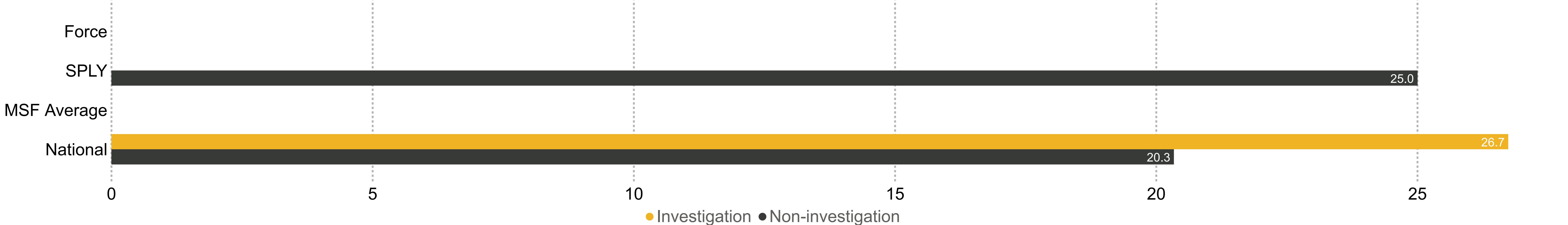
Reviews with ‘invalid dates’ have been removed from reviews timeliness. Please refer to the performance framework counting rules and calculations on the IOPC website for an explanation of invalid dates.

Section D3: Decisions on reviews

This section presents information about the decisions made on reviews including the proportion of reviews that found the outcome of the complaint was not reasonable and proportionate, those which resulted in a recommendation and, if necessary, a direction to the appropriate authority in respect of any person serving with the police. Please note: Numbers are not available for the MSF Average - % only

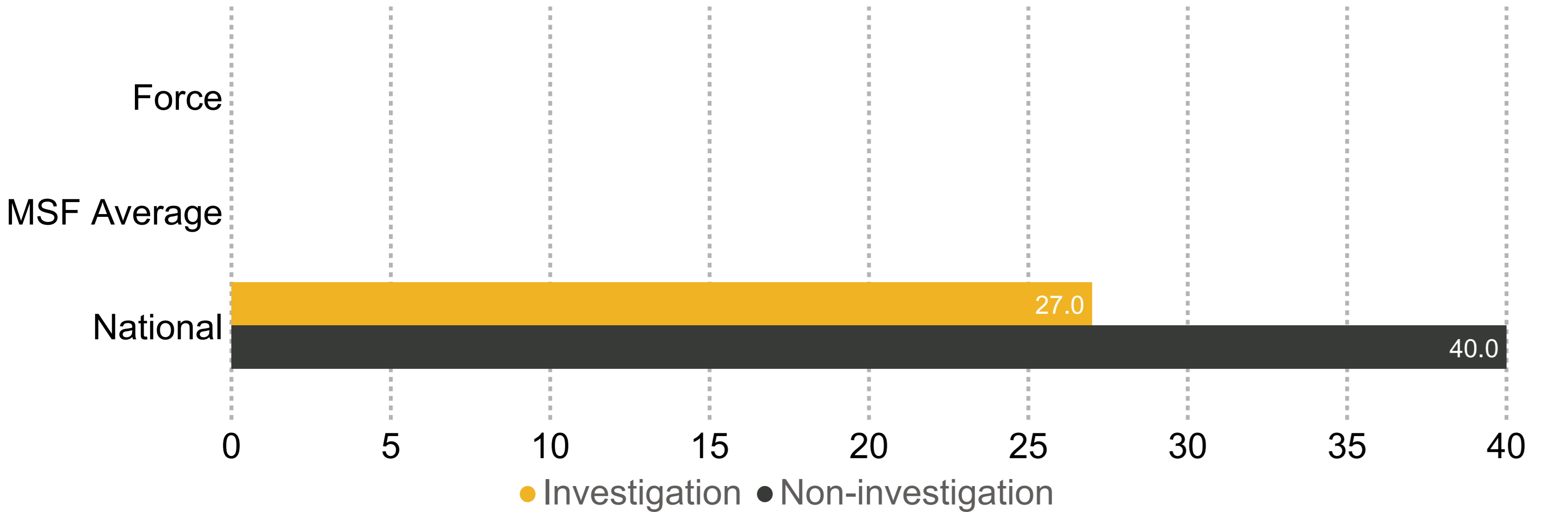
LPB reviews found not reasonable and proportionate

	Investigation			Non-investigation		
	Valid completed reviews	Found not reasonable and proportionate	% found not reasonable and proportionate	Valid completed reviews	Found not reasonable and proportionate	% found not reasonable and proportionate
Force	0		0	0		0
SPLY	0		0	4	1	25
MSF Average						
National	187	50	27	2,252	458	20



% IOPC reviews found outcome not reasonable and proportionate

	Force	SPLY	MSF Average	National
Investigation	0	0		27
Non-investigation	0	0		40



We are not currently able to add IOPC review figures to the bulletin, this will be a future development. Figures are available on request. Caution should be used as the numbers may be low.

% LPB reviews resulting in...

	Force	SPLY	MSF Average	National
Recommendation made	0	100		91
Direction	0	0		22

% IOPC reviews resulting in...

	Force	SPLY	MSF Average	National
Recommendation made	0	0		4
Direction	0	0		22

Calculation notes:

LPB reviews recommendation - % of reviews **found not reasonable and proportionate only** that resulted in a recommendation for action

IOPC reviews recommendation - % of **total valid Investigation reviews completed** tha resulted in a recommendation (the IOPC do not make recommendations on non-investigation reviews)

IOPC reviews direction - % of **total valid reviews completed** that resulted in a direction (both review types)

Section E1.1: Allegation actions - on complaint cases handled outside of Schedule 3

.	Force		SPLY		MSF Average		National	
	No.	%	No.	%	No.	%	No.	%
Actions following outside of Schedule 3 complaint cases								
Organisational learning	0	0 %	0	0 %			83	0 %
Individual learning	0	0 %	0	0 %			147	1 %
Policy review	0	0 %	0	0 %			17	0 %
Goodwill gesture	0	0 %	0	0 %			58	0 %
Apology	4	2 %	8	4 %			2274	9 %
Debrief	0	0 %	0	0 %			243	1 %
Explanation	153	95 %	128	72 %			13384	54 %
No further action	2	1 %	36	20 %			5941	24 %
Informal action by a line manager	0	0 %	0	0 %			17	0 %
Learning from Reflection	0	0 %	3	2 %			309	1 %
Other action	2	1 %	4	2 %			1809	7 %

This section presents information about what happened as a result of the allegation (action). Actions are captured at allegation level and multiple actions can be selected, where appropriate, on single allegation. The figures shown in this section are based on allegations on finalised complaint cases that resulted in the corresponding action. As more than one action can be selected for a single allegation, the sum of all percentages will not equal 100%.

The actions available once an allegation is finalised depend on how the complaint case has been handled. Please refer to our [Guidance on capturing data about police complaints](#) for details of actions available.

Please note: not all of the available actions arising from the complaint handling are shown. The actions presented in this section are those that focus on putting an issue right and preventing it from happening again by encouraging those involved to reflect on their actions and learn.

Section E1.2: Allegation actions - on complaint cases handled under Schedule 3

This section presents information about what happened as a result of the allegation (action). Actions are captured at allegation level and multiple actions can be selected, where appropriate, on single allegation. The figures shown in this section are based on allegations on finalised complaint cases that resulted in the corresponding action. As more than one action can be selected for a single allegation, the sum of all percentages will not equal 100%.

The actions available once an allegation is finalised depend on how the complaint case has been handled. Please refer to our [Guidance on capturing data about police complaints](#) for details of actions available. Please note: not all of the available actions arising from the complaint handling are shown. The actions presented in this section are those that focus on putting an issue right and preventing it from happening again by encouraging those involved to reflect on their actions and learn.

All complaint cases handled under Schedule 3

. Complaint cases resulting in below actions	Force		SPLY		MSF Average		National	
	No.	%	No.	%	No.	%	No.	%
Organisational learning	0	0 %	1	2 %			280	2 %
Individual learning	0	0 %	0	0 %			1	0 %
Apology	0	0 %	3	5 %			884	6 %
Debrief	0	0 %	0	0 %			128	1 %
Explanation	38	83 %	42	65 %			6106	41 %
Unsatisfactory Performance Procedure (UPP)	0	0 %	0	0 %			12	0 %
No further action	6	13 %	14	22 %			6447	44 %
Other action	0	0 %	0	0 %			286	2 %
Informal action by a line manager	0	0 %	0	0 %			1	0 %
Learning from Reflection	1	2 %	3	5 %			1687	11 %
Referral to RPRP	2	4 %	3	5 %			471	3 %

Misconduct, UPP and RPRP on complaints investigated under Schedule 3 (subject to Special Procedures)

Complaint cases handled under Schedule 3 that are investigated **and** subject to Special Procedures can result in misconduct proceedings

. Complaint cases resulting in below actions	Force		SPLY		MSF Average		National	
	No.	%	No.	%	No.	%	No.	%
Misconduct proceedings	1	50 %	0	0 %			47	23 %
Unsatisfactory Performance Procedure (UPP)	0	0 %	0	0 %			3	1 %
Other actions following a case to answer decision	0	0 %	0	0 %			13	6 %
Referral to RPRP	0	0 %	0	0 %			54	26 %

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## Notes

### Data sources

- Data in this bulletin is taken from XML data submissions made by forces to the IOPC every quarter except for IOPC performance data which is taken from the IOPC case management system.
- Police force employee numbers are taken from the latest [police workforce England and Wales statistics](#) published by the Home Office.
- The most similar force (MSF) groups used for the calculation of the MSF averages in this bulletin are those determined by HMICFRS. Please note that the British Transport Police and City of London Police do not have an MSF group. A list of the MSF groups is available on the [IOPC website](#).
- Figures for City of London include complaint cases logged in relation to ‘Action Fraud’. Action Fraud is the UK’s national reporting centre for fraud and cybercrime. The service is run by the City of London Police, which is the national policing lead for economic crime.

### Performance Framework counting rules and calculation

- The counting rules and calculations used to produce the data shown in this bulletin can be found on the [IOPC website](#).
- Average times are presented in working days and do not include weekends or bank holidays.
- Some percentages may add up to more or less than 100% due to rounding.
- Complaint cases and allegations with invalid start/end dates have been removed from average time calculations. Therefore, the numbers of complaint cases and allegations used in the average time calculations may be lower than the total number of complaint cases and allegations logged or finalised.

### Data constraints

- The data is sourced from live case management systems and provides a snapshot of information as it was at that time. Therefore, there may be variances between the information in this bulletin and information reported at a later date.

### Further Information

- A glossary providing a full list of definitions used in this bulletin, can be found on the [IOPC website](#).
- Additional information about the recording of police complaints, including the definitions of the complaint categories, can be found in appendix A of the IOPC’s [Guidance on capturing data about police complaints](#).
- Information about how the police complaints system operates, who can complain and how reviews are dealt with can be found in the IOPC’s [Statutory Guidance on the police complaints system \(February 2020\)](#).