

<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Dated:</b> 4 June 2024
<b>Subject:</b> Q4 Professional standards, conduct, and vetting Update 2023-24	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N/A</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	<b>N/A</b>
<b>Report of:</b> Commissioner of Police Pol 73-24	<b>For Information</b>
<b>Report author:</b> D/Supt Humphreys/PC Ann Roberts Professional Standards Dept	

### I. Summary

- Overall, the volume of Complaints has risen in comparison to Quarter 3, however the total number of allegations recorded within those complaints has decreased. There has also been an increase in the number of new Conduct Cases this Quarter with 15 cases, the majority have been assessed as Gross Misconduct. Since the last quarter, an additional two Detective Constables have been posted into the PSD investigation team on temporary attachment, which has assisted in alleviating some of this demand.
- Rising legal costs remain an issue, particularly due to the majority of conduct cases meeting the threshold of Gross Misconduct and a large proportion of them being referred to Gross Misconduct Hearings. Similarly, there are a number of officers subject to long-term suspension as their misconduct cases are held sub-judice awaiting for results of long impending criminal investigations or trials.
- The new Police Dismissals changes have replaced the role of the Legally Qualified Chair, with a Chief Officer within the police force. However the requirements to have Independent Persons and Legally Qualified Persons as part of the new composition means that these challenges in securing panels are likely to continue.

## II. Key issues from complaints and conduct data and actions taken

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

This document contains the statistics prepared by the Professional Standards Directorate for the fourth quarter of 2023/24 (Jan - March).

This quarter the total number of CoLP complaint cases logged is 53.

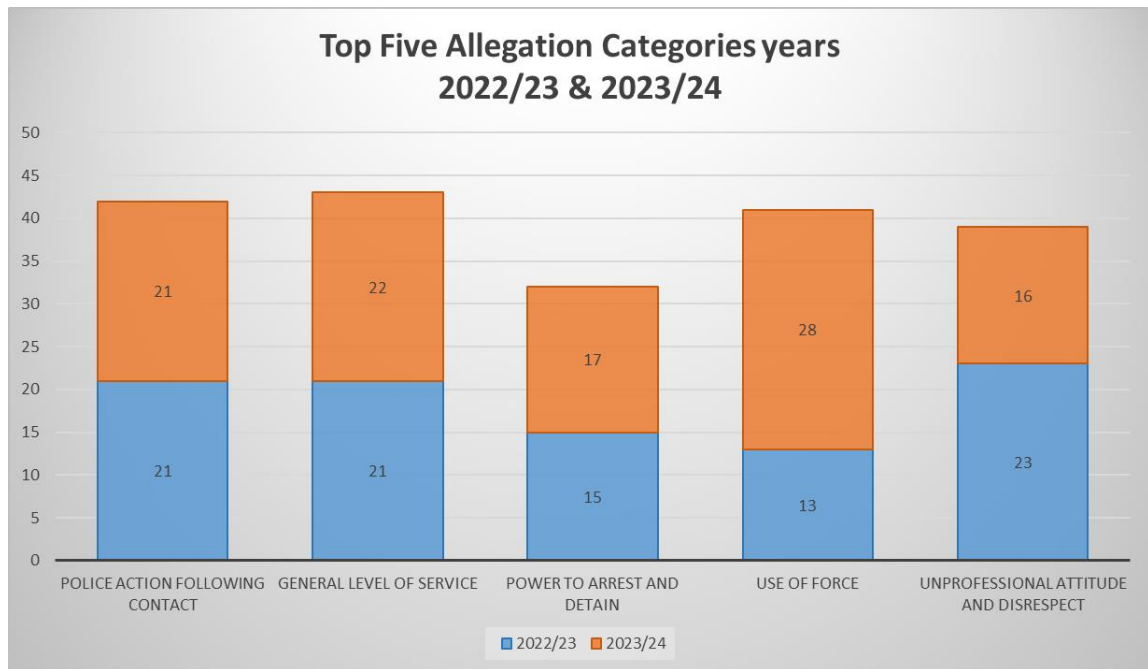
This is separated into 11 dealt with under Schedule 3 of the Police Reform Act 2002 and 42 not within Schedule 3. This figure of 53 complaints is an increase compared against Q3 where a total of 39 complaints were logged; 9 under Schedule 3, and 30 not within Schedule 3.

Of the 60 allegations recorded during Q4 2023/24 the highest number were in the category Impolite language / tone (8) Handling or/ damage to Property/premises (8) Police Action following contact (6) Impolite and intolerant actions (4)

This is a decrease in allegations recorded against Q3 of 8 (12%).

Allegation types 'Power to arrest and detain', and 'Use of Force' have featured each quarter over the last annual period, within the highest recorded types. And whilst 'Use of Force' does not feature in the top 5 of Q4, 1 allegation was recorded within this category. Indeed, the year-end data sees this as the highest allegation type, with 28 allegations overall which is a rise of 115% against the previous year's 'Use of Force' data. However, 'Use of Force' only accounted for 11% of the total allegation types for 2023/24. The allegation type 'General Level of Service' has also returned to the top five allegations, which feature in both the annual top 5 data 2022/23 and Q4.

Q4 has 3 out of 5 highest allegation type categories featured. The overall 'Top 5 allegation types' are: General level of service, Police Action following contact , Use of Force, Unprofessional Attitude and Disrespect and Power to arrest and detain. This Quarter, the following areas were the highest allegation types: Handling of/or damage to property (8), Impolite language/tone (8), Police action following contact (6), Impolite and intolerant actions (4), and General level of Service (3).

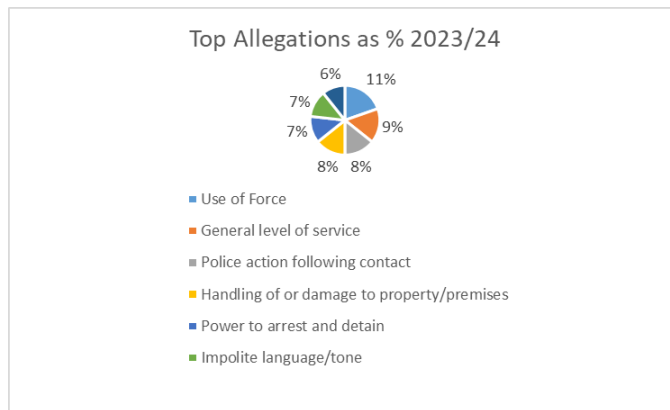


#### Q4 – Data examination: -

Analysis of the highest allegation categories (the latest Q4 is compared against both the previous quarter(s) and the total years (2023/24) and (2022/23)) where allegations concerning 'Organisational type' allegations involving service delivery/expectations are recorded under (A), and procedural type allegations which incorporates Use of Force and Power to arrest and detain (B) remain the highest areas of complaint type. This is consistent with National data in the IOPC bulletins. Examination into the allegations of a non-organisational nature: Handling of or damage to property, recorded during Q4 identified the 8 allegations were within 8 cases. Of which, all were logged as non-schedule 3 (all have been finalised as Resolved). Complaints mainly related to the seizure and return of either phones or bicycles, resulting in two learning matters identified relating to the property store recording.

The allegation type of Impolite language or tone recorded during Q4 identified that the 8 allegations were within 8 cases (6 Non-Schedule 3 and 2 Schedule 3). All of the Non-Schedule 3 cases have been Resolved and the remaining 2 schedule 3 cases were deemed that the service provided was acceptable. There were no trends to the complaints logged or learning matters identified.

2023/24 data also shows an overall trend in the increase of complaint allegation type of 'Handling of property/premises'. Eight of these allegations were recorded in Q4. The third quarter of being in the highest allegation types. This increase may relate to the increased proactive patrolling involving bikes/phones that the complaints relate to.



The total number of allegations finalised during Q4 is 113 compared to 51 in the previous quarter. This performance improvement is due to the increase in resourcing within the investigation team which has provided more prompt resolutions for complainants and officers.

Of the 113 allegations finalised:

54 Resolved

31 Service provided was acceptable

13 No further action

9 Not resolved/No further action

3 Service provided was not acceptable

1 Case to answer

1 No Case to answer

1 Withdrawn

To note, cases often contain more than one allegation; the number of cases finalised in Q4 is 83, compared to 33 finalised in Q3.

Of the cases finalised 27 were logged as Schedule 3, and 56 were not under Schedule 3. There were no cases finalised under the previous regulations.

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

During this quarter, 15 new conduct investigations were recorded, and 5 were finalised. There are currently 44 live conduct investigations, of which 25 have been assessed as Gross Misconduct. Of the matters assessed as Gross Misconduct – Discreditable conduct is the highest allegation type and relates to matters of a sexual nature. Most of these cases are complex and subject to lengthy investigation timescales. Newer conduct matters appear to be moving away from this allegation type and into Honesty and Integrity matters.

Five Conduct matters have been finalised: 1 case contained 'Reflective Practice' as an outcome, 2 cases resulted in 'No Case to Answer', 1 case was 'Case to Answer' and 1 case 'Discontinued'.

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

- Police Dismissals processes: On the 7<sup>th</sup> May 2024, new arrangements for Police Dismissals came into effect. Changes to disciplinary procedures now allow individual Chief Constables/Commissioners to have stronger decision-making powers regarding dismissals, with appropriate delegation to Assistant Chief Constable/Commander level as panel Chairs. City of London Commanders have received College of Policing training and these arrangements will affect cases being heard later this year. The City of London Police is working with the Police Authority Team to ensure that there is a common understanding of the changes and can work through any practical implications for both parties.

- Vetting: The importance of Vetting continues to increase with national significance, as seen through recommendations made within The Angiolini Inquiry Part One. Within PSD, (this is subject of a separate report on the agenda) we have more closely aligned our Vetting team to our Counter Corruption Unit and Investigation team in recognition that vetting is the 'first line of defence' against corruption and misconduct. This is further professionalising the quality and robustness of vetting standards in line with APP and the Vetting Code of Practice.

Although challenges of demand continue, since the previous reporting period, three additional Vetting Officers have joined the department which will assist in progressing vetting applications.

### **III. Forward look**

- The Angiolini Inquiry Part One: On the 29<sup>th</sup> of February 2024 Part One of the Inquiry was published, this addressed how Sarah Everard's killer was able to serve as a police officer for so long and seek to establish a definitive account of his conduct. The inquiry noted 16 recommendations for forces and national stakeholders to implement. These recommendations have been accepted nationally by policing and other key stakeholders, however, will require some notable developments within recruitment, onboarding, vetting and wider Professional Standards functions across all forces.

A full report on these recommendations is provided to this Committee.

- Vetting Authorised Professional Practice (APP) – the consultation period for the new APP has ended. However, we anticipate a delay in the publication due to the impact of The Angiolini Inquiry Part One, meaning that a further iteration may be required. We will welcome the new APP as it will standardise the approach and decision making across force vetting units.

The aim of the new APP will be to introduce a nationally standardised vetting application form and provide new standards for forces to comply with.

Summary of public complaints data – Q4 2023/24					
Metric	Current quarter (Q4)	Previous quarter (Q3)	IOPC previous quarterly bulletin (Q2)	# (%) change (Q on Q)	Comment
Complaints – Schedule 3	11	9		22%	A total of 53 cases were logged in Q4 2023/24. This is an overall increase of 14 cases from Q3 2023/24 (36%)
Complaints – not Schedule 3	42	30		40%	The average number of cases logged over the previous 5 quarters is 40 per quarter, Q4 is above average.

Allegations	60	68		12%	There were 60 allegations recorded in Q4 2023/24. This is a decrease of 8 allegations from Q3 2023/24 (12%).
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Average time to log complaints (days)	N/A	0	1	100%	Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.
Average time to contact complainant (days)	N/A	10	3	233%	
Complaints finalised – Schedule 3	27	9		200%	Increase PSD overt investigation staff
Complaints finalised - not Schedule 3	56	24		133%	

The average number of allegations over the previous 5 quarters is 63 per quarter. Q4 is below average.



Average time to finalise complaint cases (days) – Schedule 3 (NOT including subjudice cases)	Case combined data average 103 days	186	140	33%	<i>Timeliness is taken from IOPC published bulletins and available retrospectively. This is YTD collective quarterly data. i.e. Q4 (when published) will be year end.</i>
Average time to finalise complaint cases (days) – not Schedule 3		76	69	10%	
Applications for review sent to local policing body	0	0	1	100%	None recorded during Q4
Applications for review sent to IOPC	0	2	2	0%	None recorded during Q4

**Nature of allegations** – Of the 60 allegations recorded during Q4 2023/24 the highest number were in the categories of Impolite language / tone (8) Handling or/or damage to Property/premises (8) Police Action following contact (6) Impolite and intolerant actions (4)

This is a decrease in allegations recorded against Q3 of 8 (12%).

Allegation types Power to arrest and detain, and Use of Force have featured each quarter over the last yearly period, within the highest recorded types, neither of which feature in Q4. The top five allegation types at the end of 2023/24 are as follows:-

Use of Force 11%

General level of service 9%

Police action following contact 8%

Handling of or damage to property/premises 7%

Impolite language /tone 7%

Handling of property and impolite language are new to the top allegations, all three others have featured in both the annual top 5 data 2022/23 and 2023/24.

Q4 has 3 out of 5 highest allegation type categories featured.

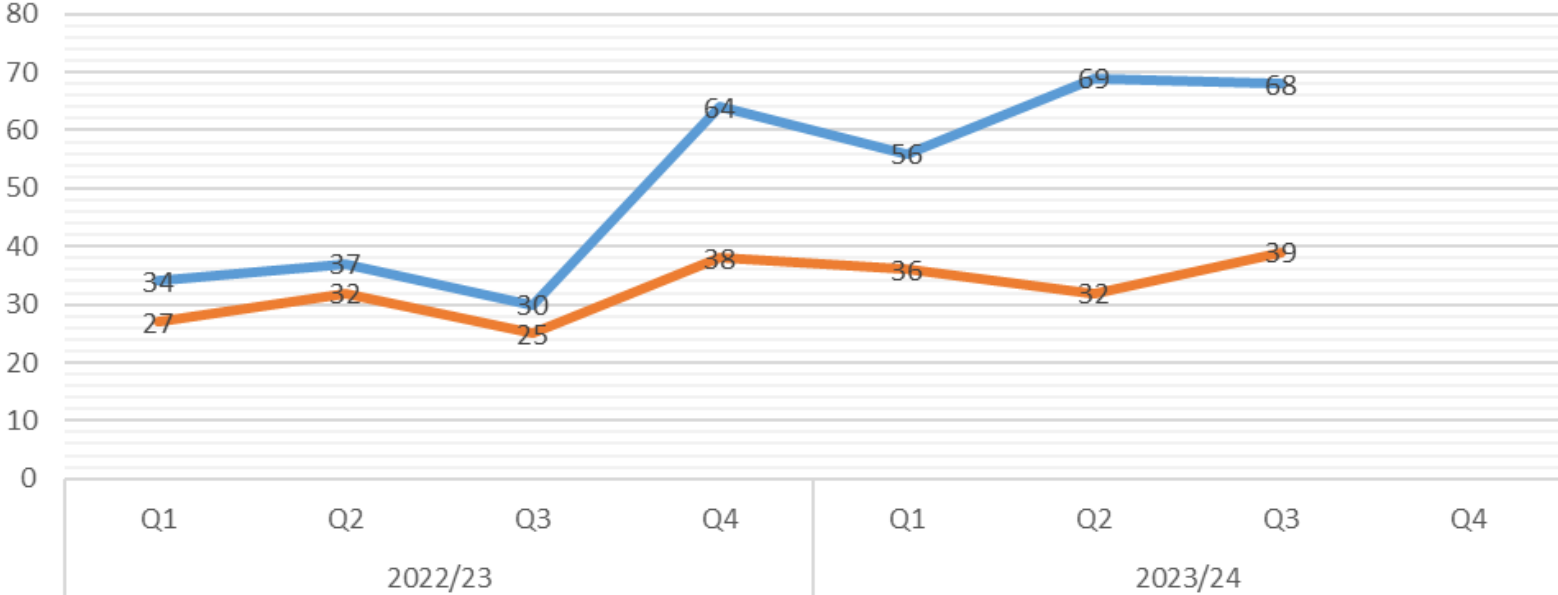
#### **Ethnicity and discriminatory behaviour –**

34% of complainant's ethnicity is recorded as Unknown. This is slightly lower against the previous quarter. It is very difficult to report on any trends, either locally or nationally due to insufficient CoLP or IOPC data.

There were five allegations of Discriminatory Behaviour logged during this reporting period. (3 Race and 1 Religion/Belief, 1 Other).

# City of London Complaint Data

— CoLP Allegations Recorded/logged      — CoLP Complaints Cases Logged



Summary of internal conduct cases and investigations– Q4 2023/24				
Metric	Number	Previous quarter (Q3)	# (%) change (Q on Q)	Comment
New conduct investigations recorded	15	6	150%	
Total live conduct investigations	44	36	22%	Total live cases of which a number are sub-judice
<i>Of which Gross Misconduct</i>	25	21	19%	
Conduct investigations finalised	5	4	25%	1 x Case to answer 1 x Reflective practise and 3 x No case to answer. 1 Discontinued
Investigations finalised within <30 days	5	1	400%	
Officers and staff on suspension	16	14	14%	
Officers and staff on restricted duties	7	6	17%	Includes officer under IOPC investigation
IOPC independent investigations	5	4	25%	Includes Westminster attack
	<p><b>Accelerated misconduct meetings</b> None held Q4</p> <p><b>Misconduct meetings / hearings held</b> - None held Q4</p>			

## **Appendices - Public**

**Appendix 1-** Gifts and hospitality register – *is not available for this update. This is currently due to a system upgrade (old SharePoint to new Microsoft 365). This will be 'Live' from Q1 2024/25, which is reported to your September PSIC.*

**Appendix 2-** Chief Officers Register of group memberships- **Public**

## **Appendices- Non-Public**

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

**Appendix 4-** PCR Misconduct dip samples x 5 (**NON PUBLIC**)