

Committee(s): Professional Standards and Integrity Committee	Dated: 25 September 2024
Subject: Professional standards, conduct, and vetting Update Q1	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1- People are Safe and Feel Safe
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Commissioner of Police	For Information
Report author: D/Supt Humphreys/PC Ann Roberts Professional Standards Dept	

Summary

- Overall, the volume of Complaints has decreased by 43% in comparison to Quarter 4. There has also been a decrease in the number of new Conduct Cases this Quarter with 7 new cases, the majority have been assessed as Gross Misconduct.
- The Professional Standards Department is improving the rate of investigation timeliness, meaning that more cases are now going through the Meeting and Hearing processes. Consequently, members will be seeing an increase in the number of Gross Misconduct cases they are updated on.
- There remains 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 now come into effect. A number of Chief Officers have now been trained to complete this role.
- The Vetting team has now benefitted from an uplift in resources to improve upon the timeliness of new vetting applications being progressed.

I. 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 first quarter of 2024/25 (April - June).

This quarter the total number of CoLP complaint cases logged is 30.

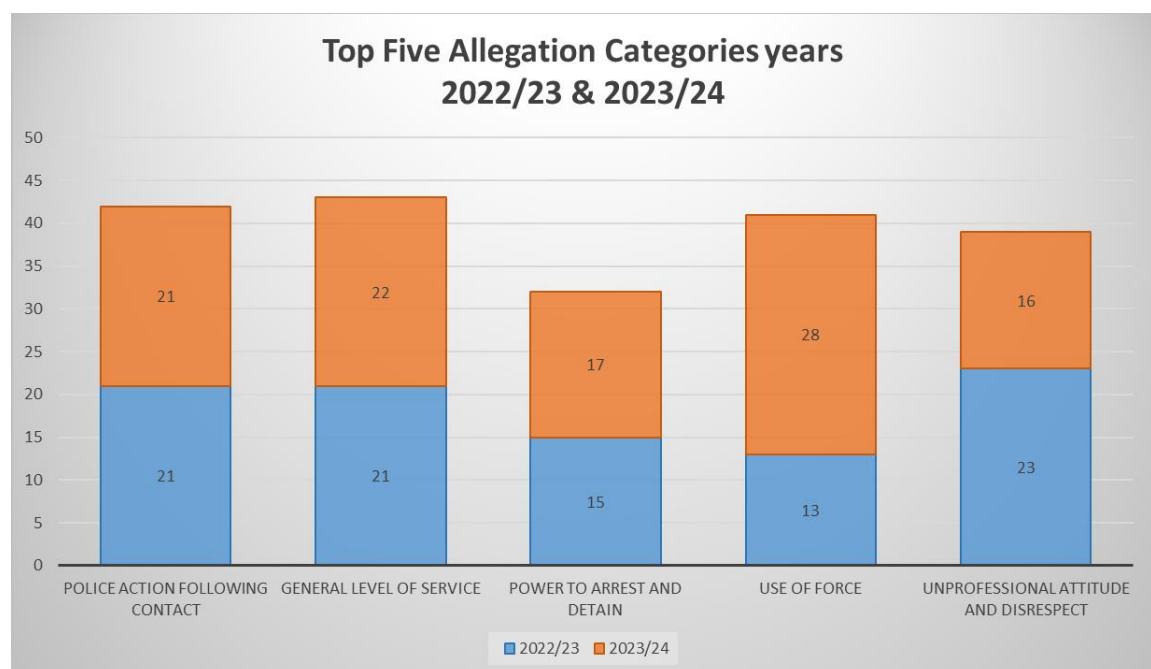
This is separated into 4 dealt with under Schedule 3 of the Police Reform Act 2002 and 26 not within Schedule 3. This figure of 30 complaints is a decrease compared against Q4 where a total of 53 complaints were logged; 11 under Schedule 3, and 42 not within Schedule 3. Compared against the same period (Q1) last year 2023/24 the total number of CoLP complaint cases logged was 36. (10 Schedule 3 and 26 not within Schedule 3).

Of the 44 allegations recorded during Q1 2024/25 the highest number were in the category Impolite language / tone (7) Police action following contact (5) General level of service (4) Power to arrest and detain (3).

This is a decrease in allegations recorded against Q4 of 16 (27%).

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 Q1, 2 allegations were 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 Q1.

Q1 has 4 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: Impolite language/tone (7), Police action following contact (5), General level of Service (4) and Power to Arrest and detain (3)



The data and trend narrative is shared across all directorates via the PSD SPOCs (Specified Points of Contact) and within the PSD Working Group, to ensure that it can be used to improve service delivery. Trends across complaints and conduct data are also informing or PSD 'Protect' Plans for pro-actively engagement (mentioned later in this report).

Q1 – Data examination: -

Analysis of the highest allegation categories (the latest Q1 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:

The allegation type of Impolite language or tone recorded during Q1 identified that the 8 allegations were within 8 cases (3 Non-Schedule 3 and 5 Schedule 3). 2 of the Non-Schedule 2 cases have been Resolved and 1 remains live. 1 schedule 3 case was deemed no further action, All other cases remain Live with 1 case being IOPC Independent. There were no trends to the complaints logged or learning matters identified.

The total number of allegations finalised during Q1 is 58 compared to 113 in the previous quarter.

Of the 58 allegations finalised:

- 24 Resolved
- 23 Service provided was acceptable
- 5 Not resolved/No further action
- 3 No further action
- 2 No Case to answer

1 Service provided was not acceptable – This related to the allegation type Evidential Procedures - the nature of which was a failure to provide evidence to court on appeal (Body worn video) due to it being incorrectly saved.

To note, cases often contain more than one allegation; the number of cases finalised in Q1 is 38, compared to 83 finalised in Q4.

Of the cases finalised 12 were logged as Schedule 3, and 26 were not under Schedule 3. There were no cases finalised under the previous regulations.

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

During this quarter, 7 new conduct investigations were recorded, and 7 were finalised. There are currently 45 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.

Seven Conduct matters have been finalised: 5 cases contained 'Reflective Practice' as an outcome, 2 cases resulted in 'No Case to Answer' no action.

One accelerated Misconduct Hearing, One Misconduct Hearing and one Misconduct meeting took place during Q1. Two officers were Dismissed without notice and placed on the Barred list, and one officer received Reflective practise in conjunction with two written warnings. These cases will be within the finalised data for Q2.

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

- Pension Forfeiture: The ability to seek a Pension Forfeiture where a police employee has received a conviction for an offence in connection with their duty, has been in place for some time. However, nationally the Home Office considered that this was under-utilised and that not all forces had a robust process in place.

A review of our Pension Forfeiture processes has been undertaken in collaboration with the Police Authority, Human Resources and Pension teams. Although pension forfeitures were considered in applicable cases previously, there had been no defined process in place. There is now a collaborative process with the Police Authority team, pensions office and Home Office to ensure that in appropriate cases, pension forfeiture applications are being made.

- Police Long Service and Good Conduct Medals: The Home Office are collating details regarding the list of individuals who have been flagged regarding their medals potentially being removed. These involve officers who have been dismissed and placed on the barred list, presently there are two CoLP former officers which this process would be applied to.

Medals are an important way that government, and society as a whole, can show gratitude to those who have provided exemplary service to the police. In the case of Police Long Service Good Conduct Medals, the recipients can wear them with pride knowing that it represents consistent service of a high standard. Where an individual continues to have the right to wear a medal when they have been dismissed from policing, it devalues the award for their colleagues who truly earned that right. It is for this reason we contacted you previously to provide a list of officers who should have their medals forfeited.

- Vetting: A separate report on Vetting will be provided to the next PSIC.

II. Forward look

- IOPC: Last year the IOPC explored how forces respond to Police Perpetrated Domestic Abuse (PPDA). This resulted in all forces being surveyed last year to understand how they recorded and responded to PPDA. This aided the IOPC to understand the challenges facing policing in this area and what is working well. The review was also complimented by a number of professional discussions with Professional Standards Departments (not CoLP) to explore the main themes. This Autumn, the IOPC will publish their findings and CoLP will ensure that any national recommendations are embedded into our recording and responding to PPDA.
- Vetting Authorised Professional Practice (APP): The new Vetting APP is still awaited following the consultation undertaken earlier this year.
- Protect Programme and Learning: The PSD Engagement Officer and Counter-Corruption Unit are designing a 'Protect Programme' to pro-actively safeguard from the risks of corruption and misconduct. This is a piece of work which is centred around organisational learning from local and national conduct cases to ensure that where preventative action can be taken, this is implemented quickly and reviewed to assess whether the approach has been effective. A recent example of this has been in response to disclosures of wrongdoing being made to employees, the learning identified was to ensure that employees are provided with guidance regarding what is expected of them in those circumstances, ranging from how to report the matter and how to support the employee who may be a victim or witness. One of the benefits of PSD being part of the Professionalism and Trust directorate, is that this learning can be further cascaded through varied programmes of work within the Inclusivity Culture and Organisational Development (ICOD) and Learning and Development (L&D) teams.

Summary of public complaints data – Q1 2024/25						
Metric	Current quarter (Q1)	Previous quarter (Q4)	Previous year (Q1)	(%) change (Q on Q)	(%) change (Y on Y)	Comment
Complaints – Schedule 3	4	11	10	64%	60%	A total of 30 cases were logged in Q1 2024/25. This is an overall decrease of 23 cases from Q4 2023/24 (43%)

Complaints – not Schedule 3	26	42	26	100%	0%	The average number of cases logged over the previous 5 quarters is 38 per quarter, Q1 is below average.
Allegations	44	60	56	27%	21%	There were 44 allegations recorded in Q1 2024/25. This is a decrease of 16 allegations from Q4 2023/24 (27%).

						The average number of allegations over the previous 5 quarters is 59 per quarter. Q1 is below average.
Average time to log complaints (days)	1	0	1	100%	No Change	<i>Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.</i>
Average time to contact complainant (days)	1	9	2	89%	50%	
Complaints finalised – Schedule 3	12	27	3	56%	300%	

Complaints finalised - not Schedule 3	26	56	13	54%	100%	
Average time to finalise complaint cases (days) – Schedule 3 (NOT including subjudice cases)	112	150	97	100%	15%	<i>Timeliness is taken from IOPC published bulletins and available retrospectively. Q4 is cumulative Year End quarterly data.</i>

Average time to finalise complaint cases (days) – not Schedule 3	37	84	65	56%	43%	
Applications for review sent to local policing body	2	1	1	100%	100%	
Applications for review sent to IOPC	1	5	0	150%	100%	
	<p>Nature of allegations – Of the 44 allegations recorded during Q1 2024/25 the highest number were in the categories of Impolite language / tone (7) Police Action following contact (5) Race (5) General level of Service (4) Power to Arrest and Detain (3)</p> <p>This is a decrease in allegations recorded against Q4 of 16 (27%).</p>					

Allegation types: 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.

Q1 2024/25 contains 4 out of the above top allegation types. Use of Force does not feature this quarter.

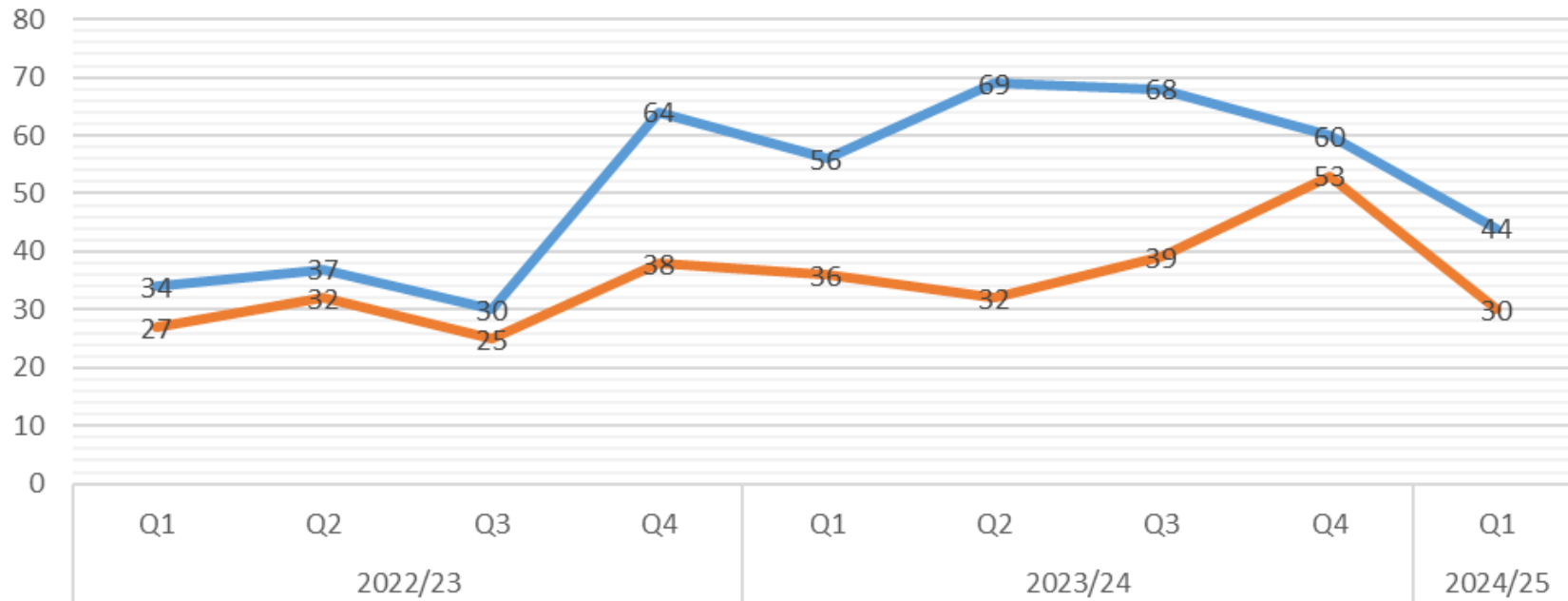
Ethnicity and discriminatory behaviour –

46% of complainant's ethnicity is recorded as Unknown. This is higher 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 is no legal requirement for complainants to provide any EDI data and there is a low declaration rate across all Forces/IOPC.

There was five allegations of Discriminatory Behaviour logged during this reporting period. (5 Race).

City of London Complaint Data

CoLP Allegations Recorded/logged CoLP Complaints Cases Logged



Summary of internal conduct cases and investigations– Q1 2024/25				
Metric	Number	Previous quarter (Q4)	# (%) change (Q on Q)	Comment
New conduct investigations recorded	7	15	53%	
Total live conduct investigations	45	44	2%	Total live cases of which a number are sub-judice

<i>o.w. gross misconduct</i>	25	25	0%	
Conduct investigations finalised	7	5	25%	5 x No case to answer - Reflective practise. 2 x No case to answer - no action.
Investigations finalised within <30 days	2	5	60%	

Officers and staff on suspension	23	16	44%	Includes officer under IOPC investigation
Officers and staff on restricted duties	7	6	14%	Includes officer under IOPC investigation
IOPC independent investigations	5	4	25%	Includes Westminster attack

Accelerated misconduct meetings held Q1

One Accelerated Misconduct Hearing held. Discreditable conduct (Drugs). Officer had resigned. Case to Answer - Officer would have been Dismissed without notice. Placed on Barred list.

Misconduct meetings / hearings held Q1

One Misconduct Meeting held. Orders and Instructions (3 allegations) relating to police driving. Case to Answer - 1 x Reflective practise and 2 x Written Warnings issued.

One Misconduct Hearing held. Discreditable conduct (sexual) and Honesty & Integrity. Case to answer. 1 x Misconduct 1 x Gross Misconduct - overall finding Gross Misconduct - Dismissed without notice. Placed on Barred list.

Appendices - Public

Appendix 1- City of London- IOPC complaints bulletin – Q1

Appendix 2- Gifts and hospitality register – The G&H system has been upgraded (old SharePoint to new Microsoft 365). This is now 'Live' from Q1 2024/25.

Appendix 3- Chief Officers Register of group memberships

Appendices- Non - Public

Appendix 4- Officers Suspended/ Restricted (**NON PUBLIC**)