

Committee(s): Professional Standards and Integrity Committee – For Information	Dated: 06 February 2025
Subject: Professional standards, conduct, and vetting Update Q3	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides statutory duties • provides business enabling functions 	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	£-
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	
Report author: D/Supt Humphreys/PC Ann Roberts Professional Standards Dept	

Summary

- Overall, the volume of Complaints has increased by 41% (12 complaints) in comparison to Quarter 2. There have been no new Conduct Cases recorded this Quarter.
- 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. However, a number of these cases are set for trial early next year, this may lead to a representative increase in Misconduct Hearings.
- There has been a consistent number of new misconduct investigations, however a decrease in the number of live misconduct investigations. This is attributable to cases being assessed and investigated quicker.
- The Vetting team continues to benefit from an uplift in resources, improved processes and staff training which has resulted in sustained improvements regarding service delivery.

Recommendations

Members are asked to:

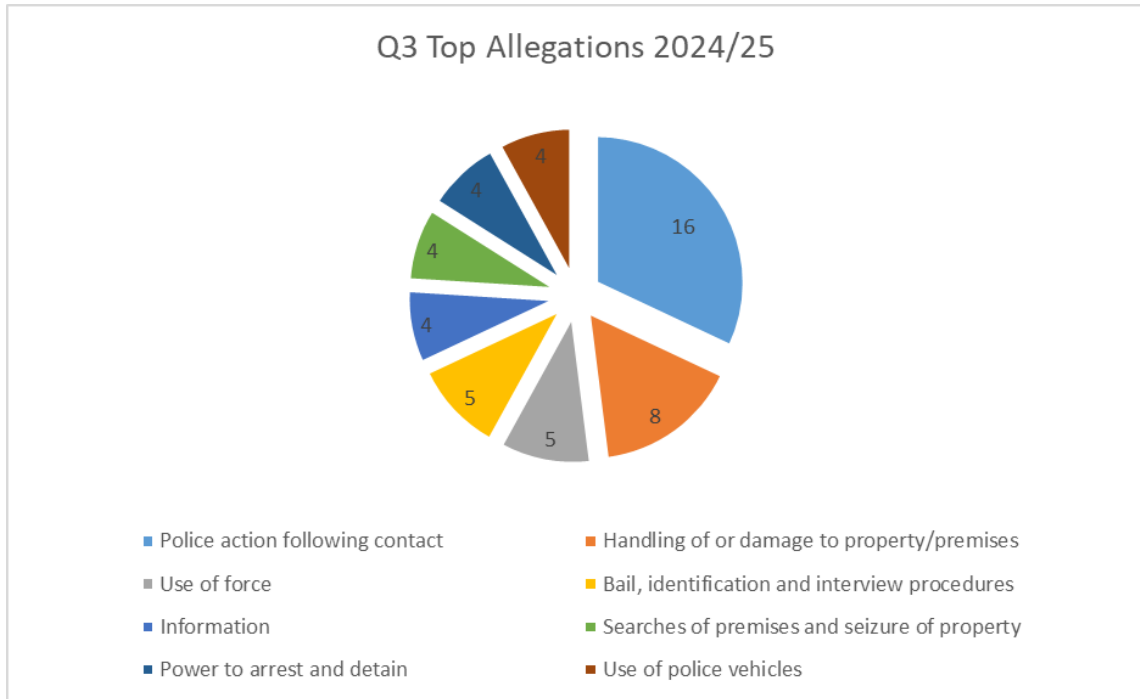
- Note the report.

Main Report

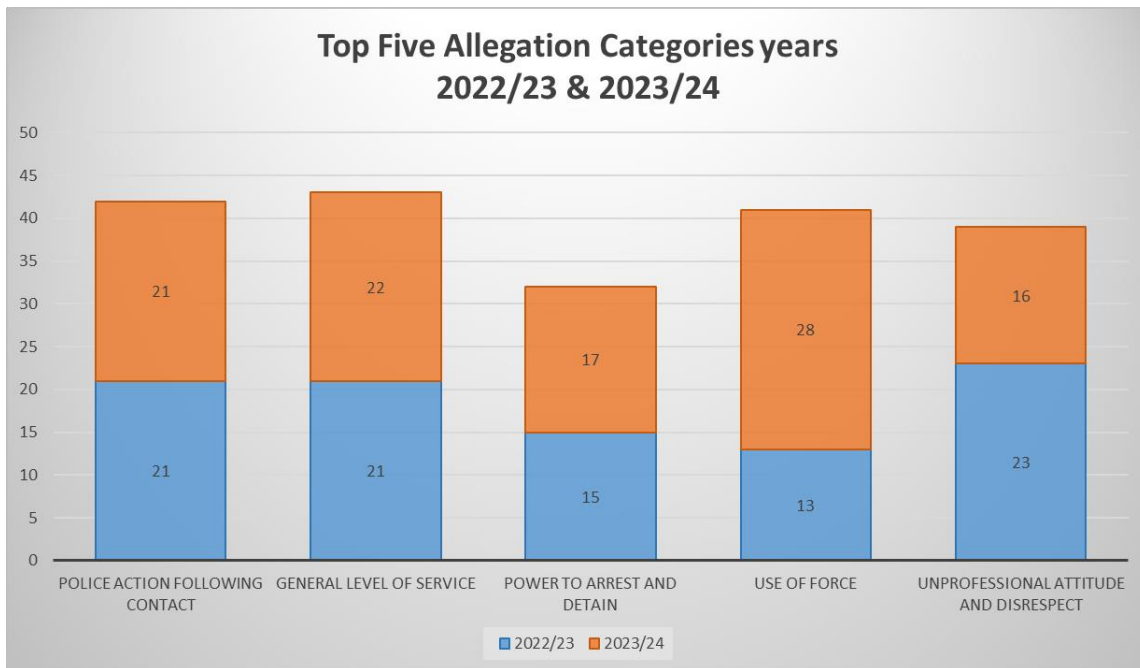
I. Key issues from complaints and conduct data and actions taken

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

1. This document contains the statistics prepared by the Professional Standards Directorate for the third quarter of 2024/25 (Oct - Dec).
2. This quarter the total number of CoLP complaint cases logged is 41.
3. This is separated into 4 dealt with under Schedule 3 of the Police Reform Act 2002 and 37 not within Schedule 3. This figure of 41 complaints is an increase of 12 compared against Q2 where a total of 29 complaints were logged; 9 under Schedule 3, and 20 not within Schedule 3. Compared against the same period (Q3) last year 2023/24 the total number of CoLP complaint cases logged was 39. (9 Schedule 3 and 30 not within Schedule 3).
4. Of the 70 allegations recorded during Q3 2024/25 the highest number were in the categories of: Police action following contact (16) Handling of/or damage to property/premises (8) Use of Force (5) Bail, identification and interview procedures (5)
5. Information, Searches of premises and seizure of property, Power to arrest and detain, and Use of police vehicles all had 4 allegations each allegation type.
6. This is an increase in allegations recorded against Q2 of 27 (63%).
7. Q3 has 4 out of 5 highest allegation type categories featured in the overall 'Top 5 allegation types' against two years of data which are: General level of service, Police Action following contact, Use of Force, Unprofessional Attitude and Disrespect and Power to arrest and detain.



8. The allegation type 'Police action following contact' remains the highest allegation type across annual (2022/23 & 2023/24) and quarterly data. Handling of/or damage to property/premises also featured as a high allegation category 2023/24 and has returned in Q3 to the top 5, as does Use of Force and Power to arrest and detain.



9. The data and trend narrative is shared across all directorates via the PSD SPOCs (Specified Points of Contact), within the PSD Working Group, and PSD membership in the Stop and Search Working Group to ensure that data and learning can be used to improve service delivery. Trends across complaints and conduct data are also informing our PSD 'Protect' Plans for pro-active

engagement (outlined in the Q1 paper to PSIC). The Protect Engagement function of PSD means that thematic issues and key learning can be shared quickly across relevant areas with interventions implemented as required.

Q3 – Data examination: -

10. Analysis of the highest allegation categories (the latest Q3 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) and communication type allegations which incorporates Impolite language and tone (H) remain the highest areas of complaint type. This is consistent with National data in the IOPC bulletins. In Q3 34% Organisational type allegations were recorded (Q2 = 33%)
11. The total number of allegations finalised during Q3 is 69 compared to 46 in the previous quarter.
12. Of the 69 allegations finalised:
 - 34 Resolved
 - 13 Service provided was acceptable
 - 1 Not determined if the service acceptable
 - 5 Service Not acceptable
 - 11 Not resolved/No further action
 - 2 No further action
 - 3 Derecorded
13. The 5 allegations finalised where the Service provided was not acceptable relate to 5 cases. Each allegation was different and no theme was identified.
14. One case the allegation type of Police action following contact where a crime report was lost within the system causing delays. One case the allegation type of Stops & stop and search where the complainant was unhappy about the stop/search after calling police for assistance, the officers were referred to Reflective Practice. One case the allegation type of Handling of or damage to property where a crossbow had been seized and destroyed and the complainant had not been made aware of the process to collect the item. One case the allegation types Use of police vehicles, where the parking of police vehicles blocking the entrance to Victoria Ave was causing nuisance to residents of the flats in the same location. Learning has been cascaded. One case the allegation type of Impolite language and /or tone, where officers in the front counter were unhelpful in relation to an FOI request, the officers received Reflective Practice.

15. To note, cases often contain more than one allegation; the number of cases finalised in Q3 is 45, compared to 27 finalised in Q2.

16. Of the cases finalised 9 were logged as Schedule 3, and 36 were not under Schedule 3. There were no cases finalised under the previous regulations.

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

17. During this quarter, no new conduct investigations were recorded, and 1 case was finalised. There are currently 31 live conduct investigations, of which 23 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.

18. 1 Conduct matter has been finalised: This case was de-recorded.

19. One accelerated Misconduct Hearing took place during Q3, the officer had resigned prior to proceedings but were found for Discreditable conduct and would have been dismissed had they not resigned. The officer has been placed onto the barred list.

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

20. Welfare Strategy: The new Welfare Strategy will be submitted for internal sign-off this month. Additionally, an implementation strategy is being developed with a training programme for all welfare officers, ensuring that those providing this critical function are trained and supported.

21. Professionalism Newsletter re-launch: The first version of the new format will be published this month, it will feature an update on the new Vetting APP, launch of the Welfare Strategy and key changes, such as amendments to the Chairing of Misconduct Hearings.

22. PSD Protect: A programme of PSD drop-in sessions have been established, with the first on 3rd February 2025. These sessions will provide employees, and in particular supervisors and line managers, an opportunity to discuss PSD matters where a formal submission is not required. This may be around seeking advice regarding emerging and/or more minor behaviours, or dealing with behaviours which may be more suited to a grievance or performance route rather than PSD.

Vetting:

23. Members were provided with a detailed separate report regarding Vetting service improvement within Q2 papers. Within that report, a detailed overview of performance was provided. This performance has continued to stabilise

across Q3, demonstrating that the resourcing, process improvements, better used of technology and upskilling of staff has sustained and is in line with our new operating model.

Furthermore;

24. The continuous improvement Action Plan for Vetting established in summer 2024 maintains to progress, with tangible improvements relating to productivity and service delivery. Currently, 56% of the 43 actions set have been completed, and 33% are in progress. All actions assessed as either 'very high' or 'high' in priority are part of the completed or in progress categories.

Overview of Action Plan

Actions	RAG Rating				Grand Total
	Very High	High	Medium	Low	
Number of Actions	3	21	16	5	45
% of Total	6%	47%	36%	11%	100%
Completed	1	15	7	2	25 (56%)
In Progress	2	5	6	2	15 (33%)
Not Started	-	-	2	1	3 (6%)
Rejected	-	1	1	-	2 (5%)

25. Since the summer 2024 vetting review, there has been a 96% reduction in the number of cases waiting to be allocated. All CoLP employees who required re-vetting have now had their vetting process completed. The vetting unit are working on a horizon forecast approach to re-vets, this will ensure that the demand is spread across the year and any surges (such as through police uplift cohorts requiring re-vets) can be anticipated and well planned for.

26. Continued training remains a focus for the team to support decision making and identification of risk, such as:

- (i) *Force Vetting Decision-Making learning* package introduced as mandatory training and repeated annually. The learning outcomes are now included as part of the Vetting Officers annual PDR objectives, to increase professionalisation of practice and further develop skill profiles.
- (ii) Capability development plan enacted to upskill the Vetting Service beyond mandatory NCALT packages which includes:

- Shadowing by Operational police officers to support the improvement of decision making and increase knowledge of offence types, relevancy & suitability.
- Input from Intelligence officers to provide instruction and examples of how to interpret and summarise intelligence logs.

II. Forward look

27. New Vetting Authorised Professional Practice (APP): In December 2024, the College of Policing published the new Vetting APP. The key themes are:

- Additional more robust standards to strengthen processes,
- Increased focus on vetting reviews to proactively identify any change in circumstances or information of concern.
- Introduction of one national vetting application form.
- Introduction of mandatory, randomised re-vetting.
- Greater emphasis on supervisory appraisals to support the wider protective security regime.

28. The vetting team are currently reviewing the APP to ensure that all of our current policies and procedures reflect the new changes. This is being complemented by a communications strategy to ensure that all employees are aware of the key changes.

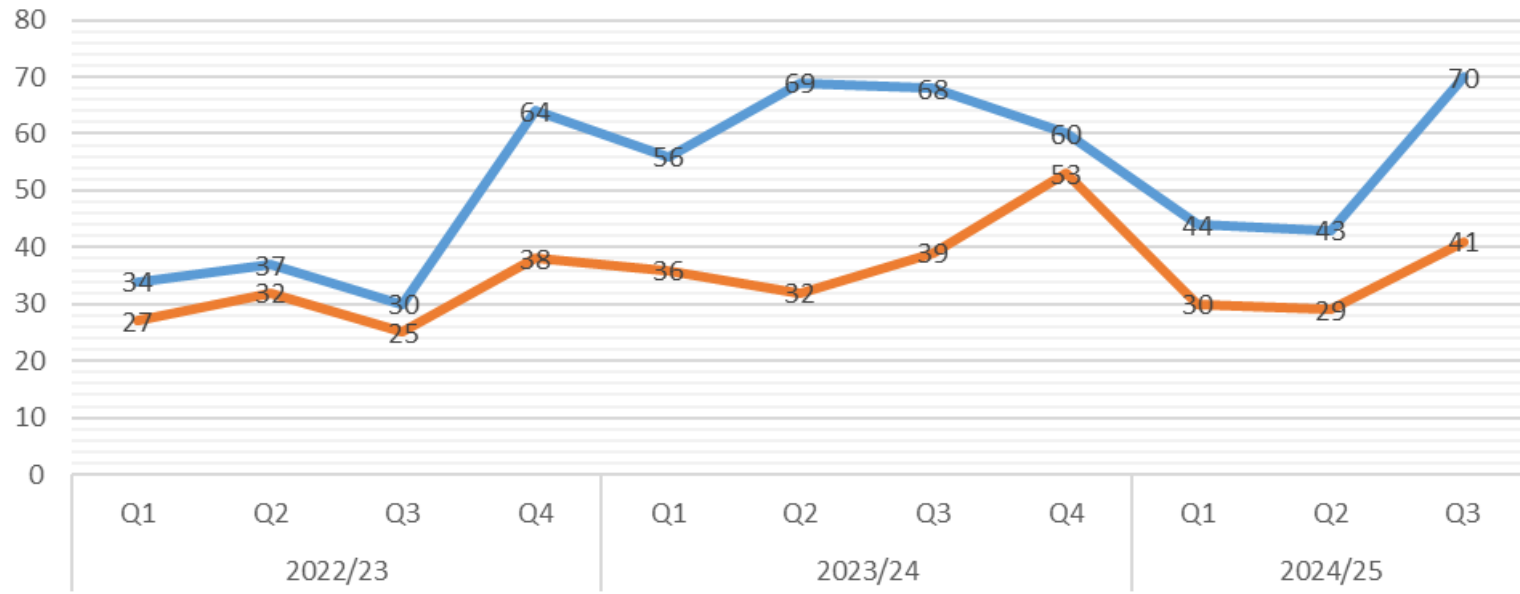
29. Appendix 3 of this report outlines a summary of the new Vetting APP and a future meeting of PSIC will receive a delivery plan for the City of London Police to meet the requirements.

30. Home Office Police Dismissals Review: Anticipated 'go live' date will be spring/summer 2025 with a focus on:

- - Presumption for dismissal when Gross Misconduct identified.
- - Accelerated hearings for former officers
- - Removal of vetting regulations and the holding of vetting to be made a statutory or regulatory requirement.
- - Performance regulations to be reformed.

City of London Complaint Data

CoLP Allegations Recorded/logged CoLP Complaints Cases Logged



Summary of public complaints data – Q3 2024/25						
Metric	Current quarter (Q3)	Previous quarter (Q2)	Previous year (Q3)	(%) change (Q on Q)	(%) change (Y on Y)	Comment
Complaints – Schedule 3	4	9	9	56%	56%	A total of 41 cases were logged in Q3 2024/25. This is an increase of 12 cases from Q2 2024/25
Complaints – not Schedule 3	37	20	30	85%	23%	The average number of cases logged over the previous 5 quarters is 38 per quarter, Q3 is above average.

Allegations	70	43	68	63%	3%	<p>There were 70 allegations recorded in Q3 2024/25. This is an increase of 27 allegations from Q2 2024/25</p> <p>The average number of allegations over the previous 5 quarters is 57 per quarter. Q3 is above average.</p>
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Average time to log complaints (days)	N/K	1	1	%	no change	<i>Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.</i>
Average time to contact complainant (days)	N/K	1	10	%	%	
Complaints finalised – Schedule 3	9	7	9	29%	0%	
Complaints finalised - not Schedule 3	36	20	24	80%	50%	

Average time to finalise complaint cases (days) – Schedule 3 (NOT including subjudice cases)	N/K	110 (Q2 YTD)	186 (Q3 2023/24 YTD)	%	%	<p><i>Timeliness is taken from IOPC published bulletins and available retrospectively.</i></p> <p><i>Q3 2024/25 is not yet published at time of writing</i></p>
Average time to finalise complaint cases (days) – not Schedule 3	N/K	43	76	%	%	

Applications for review sent to local policing body	N/K	1	1	%	%	
Applications for review sent to IOPC	N/K	1	5	%	%	

Nature of allegations – Of the 70 allegations recorded during Q3 2024/25 the highest number were in the categories of Police Action following contact (16) Handling of/or damage to property (8) Use of Force (5) Bail, Identification & interview (5)

This is an increase in allegations recorded against Q2 of 27

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.

Q3 2024/25 contains 4 out of the above top allegation types. Use of Force returns to feature this quarter. Police action following contact remains the highest allegation category and equates for 23% of all allegations logged.

Ethnicity and discriminatory behaviour –

36% of complainant’s ethnicity is recorded as Unknown and 16% complainants prefer not to say their ethnicity. It is 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. In order to improve on this self-declaration, CoLP remain working on a short questionnaire as mentioned in the Q2 report.

There were two allegations of Discriminatory Behaviour logged during this reporting period. (2 Race).

Summary of internal conduct cases and investigations– Q3 2024/25				
Metric	Number	Previous quarter (Q2)	# (%) change (Q on Q)	Comment
New conduct investigations recorded	0	7	100%	

Total live conduct investigations	31	36	14%	Total live cases of which a number are sub-judice
<i>o.w. gross misconduct</i>	25	25	0%	
Conduct investigations finalised	1	13	92%	Derecorded case
Investigations finalised within <30 days	0	1	100%	
Officers and staff on suspension	18	16	12%	
Officers and staff on restricted duties	5	7	29%	Includes officer under IOPC investigation
IOPC independent investigations	5	4	25%	Includes Westminster attack

Accelerated Misconduct Meetings held Q3

Case regards improper recording and dissemination of evidential material to unauthorised 3rd party. AMH – Hearing took place on the on the 5th November 2024 where Cmsr O’Doherty found that had the officer been a serving officer he would have been dismissed. Former officer placed on the barred list.

<u>Misconduct meetings / hearings held Q3</u>
None held

Conclusion

31. In conclusion, the data presented highlights notable trends and developments within complaints, conduct investigations, and the progress of the Professional Standards Directorate (PSD) during Q3 2024/25. The 41% increase in complaint volumes reflects heightened public engagement or emerging service delivery concerns, with recurring allegation types like “Police action Following Contact” and “Use of Force” remaining key focus areas for improvement. Despite an absence of new conduct cases this quarter, ongoing sub-judice misconduct cases signal potential increases in misconduct hearings as legal proceedings conclude.
32. Operational enhancements, such as the sustained improvements in the vetting process and the proactive measures under the PSD “Protect” programme, demonstrate the organisation’s commitment to addressing concerns efficiently and fostering a culture of professionalism.
33. Looking forward, the adoption of new national vetting standards and anticipated reforms under the Home Office Police Dismissals Review provide an opportunity for further aligning processes with evolving expectations. These initiatives coupled with targeted actions to address identified trends, will ensure continued improvements in service delivery, transparency and public trust.

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Appendices - Public

Appendix 1 - Gifts and hospitality register

Appendix 2 - Chief Officers Register of group memberships

Appendices - Non-Public

Appendix 3 – Vetting Authorised Professional Practice Summary (**NON-PUBLIC**)

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