

## City of London Corporation Committee Report

<b>Committee(s):</b> Professional Standards and Integrity Committee – For Information	<b>Dated:</b> 03 June 2025
<b>Subject:</b> Professional standards, conduct, and vetting Update Q4	<b>Public report:</b> For Information
<b>This proposal:</b> <ul style="list-style-type: none"> <li>• <b>delivers Corporate Plan 2024-29 outcomes</b></li> <li>• <b>provides statutory duties</b></li> <li>• <b>provides business enabling functions</b></li> </ul>	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>	No
<b>If so, how much?</b>	£-
<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	
<b>Report author:</b> D/Supt Humphreys/PC Ann Roberts Professional Standards Dept	

### Summary

- Overall, the volume of Complaints has remained identical in Q4 in comparison to Q3 (same number logged). There have been 9 new Conduct Cases recorded this quarter.
- There remains a number of officers subject to long-term suspension. Many relate to misconduct cases held sub-judice awaiting for results of long impending criminal investigations or trials. Some of these cases have now concluded and translate through to Misconduct Hearings over coming months.
- Progress across the Vetting Action Plan has seen a shift in completed recommendations from 56% last quarter to 69% this quarter.
- New Vetting Regulations will now enable police forces to dismiss officers who are unable to meet the vetting requirement for the role.

## **Recommendations**

Members are asked to:

- Note the report.

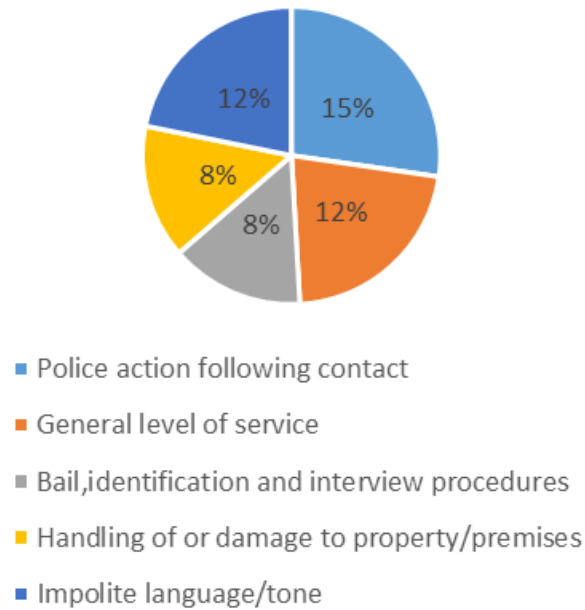
## **Main Report**

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

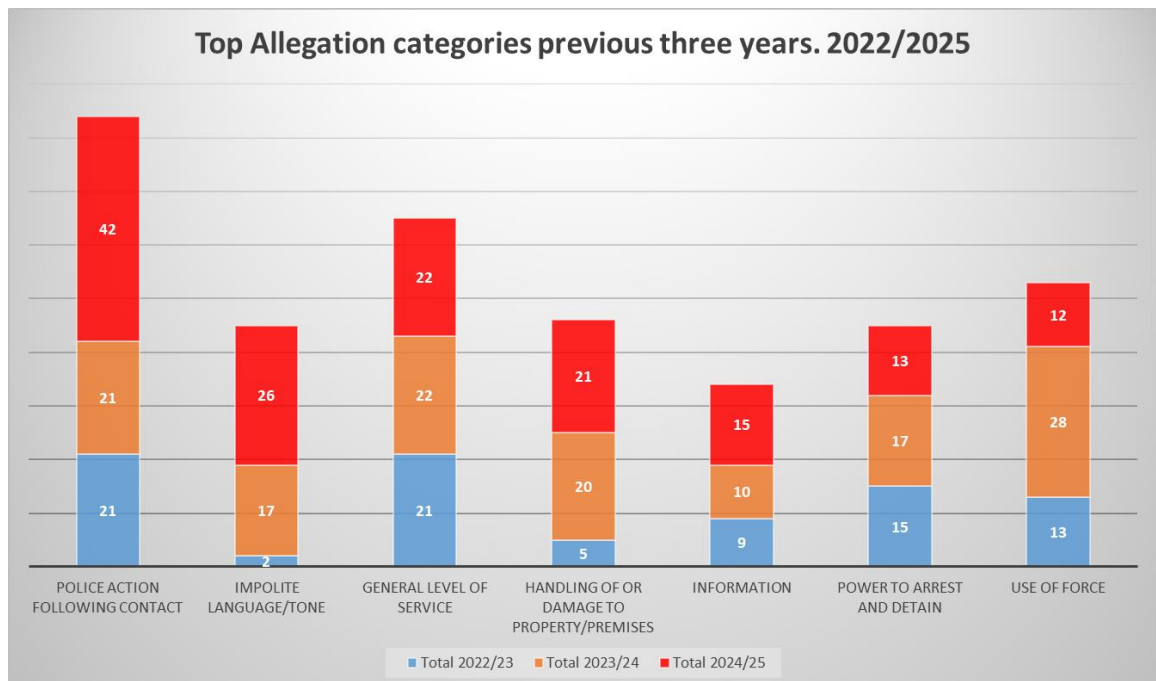
- **Complaint volumes, content, and performance –**

1. This document contains the statistics prepared by the Professional Standards Directorate for the fourth quarter of 2024/25 (Jan-March).
2. This quarter the total number of CoLP complaint cases logged is 41.
3. This is separated into 14 dealt with under Schedule 3 of the Police Reform Act 2002 and 27 not within Schedule 3. This figure of 41 complaints is the same volume compared against Q3 where a total of 41 complaints were logged; 4 under Schedule 3, and 37 not within Schedule 3. Compared against the same period (Q4) last year 2023/24 the total number of CoLP complaint cases logged was 53. (11 Schedule 3 and 42 not within Schedule 3).
4. Of the 89 allegations recorded during Q4 2024/25 the highest number were in the categories of: Police action following contact (13) General level of service (11) Impolite language and tone (11) Handling of/or damage to property/premises (7) Bail, identification and interview procedures (7)
5. This is an increase in allegations recorded against Q3 of 19 (27%).
6. Q4 has 4 out of 5 highest allegation type categories featured in the overall 'Top 5 allegation types' against the full year 2024/25 data which are: General level of service, Police Action following contact, Impolite language and Tone, and Handling of or damage to property.
7. Allegation types General level of service and Police action following contact have been in the top 5 allegation types for the previous three years.

### Q4 Top Allegations 2024/25



8. The allegation type 'Police action following contact' remains the highest allegation type across annual (2022/22, 2023/24, 2024/25) and quarterly data. The graph below visually represents the highest allegation types over the previous three years. Use of Force and Power to arrest and detain have both dropped out of the top five this year.



9. The data and trend narrative are 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.

Q4 – Data examination: -

10. Analysis of the highest allegation categories (the latest Q4 is compared against both the previous quarter(s) and the total years (2024/25) (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 Handling of or damage to property (C) 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 Q4 37% Organisational type allegations were recorded (Q3 = 34%)
11. The total number of allegations finalised during Q4 is 66 compared to 69 in the previous quarter.
12. Of the 66 allegations finalised:
  - 33 Resolved
  - 18 Service provided was acceptable
  - 1 Service Not acceptable
  - 11 Not resolved/No further action
  - 1 No further action
  - 2 Withdrawn
13. The one allegation finalised where the Service provided was NOT acceptable relates to one case. Allegation type – information.
14. During 2024/25 there have been a total of 11 allegations (5% of all allegations finalised) where service has NOT been acceptable. These relate to 10 cases (7% of total cases finalised). One case had two allegations – Police action following contact and Information. The officer had failed to respond to the complainant and failed to provide the relevant department with the information once received. The officer received reflective practice.
15. To note, cases often contain more than one allegation; the number of cases finalised in Q4 is 35, compared to 45 finalised in Q3.
16. Of the cases finalised 10 were logged as Schedule 3, and 25 were not under Schedule 3. There were no cases finalised under the previous regulations.

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

17. During this quarter, 9 conduct investigations were recorded, and 5 investigations were finalised. There are currently 36 live conduct investigations, of which 18 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. In total 5 Conduct matters have been finalised: 3 cases – No case to answer /No action. 1 case – Case to answer – Misconduct meeting – written warning, and 1 case discontinued – no action.
19. One Misconduct Hearing took place during Q4, the officer was found to have breached Confidentiality and Authority, Respect and Courtesy (gross misconduct) and was dismissed without notice. The officer has been placed onto the barred list.

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

20. PSD Protect: This programme continues to be delivered with the key focus last quarter on new joiner and leadership inputs from PSD. A look ahead will see a greater focus on:
  - Structured de-briefs to teams affected by colleagues dismissed through misconduct processes. The objective being to myth-bust PSD processes and ensure that any organisational learning is delivered directly.
  - Week of 'Focus On' and engagement events targeted at specific PSD themes.

Vetting:

21. New measures laid in Parliament mean that passing vetting will become a legal requirement for all serving officers. These measures will come into effect through new Vetting Regulations on 14 May 2025. The requirement for Vetting Regulations became notable following the High Court's ruling in the Sgt di Maria case which revealed a significant gap in the existing conduct framework, leaving police forces unable to remove officers whose vetting had been withdrawn.

The Regulations will provide a fair and clear process for reviewing vetting decisions and, where needed, remove officers who no longer meet the standards the public rightly expects.

22. The continuous improvement Action Plan for Vetting established in summer 2024 maintains to progress, with tangible improvements relating to productivity and service delivery. Currently, 78% of the actions set have been completed, and 22% are in

progress. All actions assessed as either 'very high' or 'high' in priority are part of the completed or in progress categories.

The majority of the actions outstanding relate to the ability for HR and Vetting systems to interface. The current HR system does not have this functionality, however some manual workarounds are being implemented, for example, employees having access to a vetting self-service tab on their HR file to check their own vetting level and expiry date.

### Overview of Action Plan:

Actions	RAG Rating				Total
	Very High	High	Medium	Low	
Number of Actions	3	21	12	4	40
% of Total	7%	53%	30%	10%	100%
Completed	1	18	9	3	31 (78%)
In Progress	2	2	4	1	9 (22%)
Not Started	-	-	-	-	0

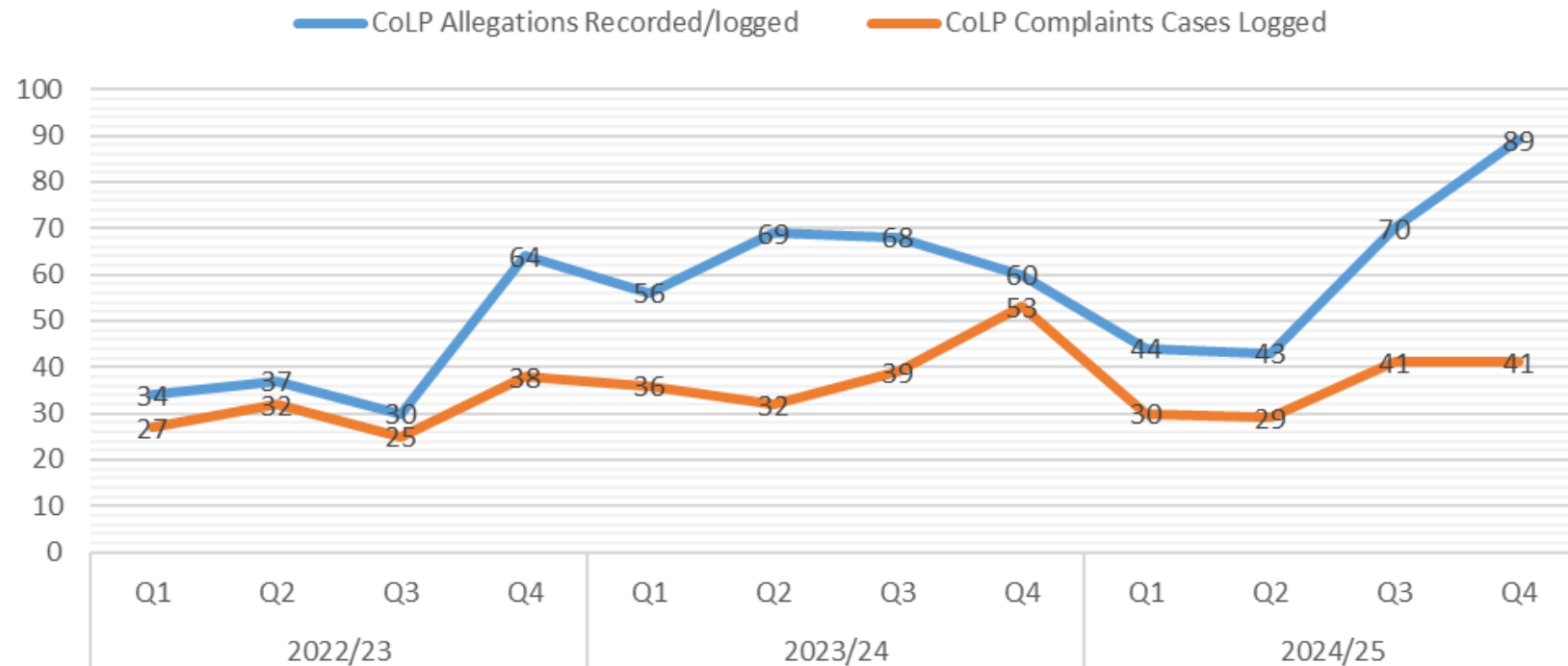
## II. Forward look

23. The new Vetting Authorised Professional Practice (APP) launched in December 2024, the College of Policing published the new Vetting APP. All of these changes are embedded into current processes, with a small number working through implementation. An example being annual integrity reviews, this process has been designed and will begin roll-out this quarter.

24. Home Office Police Dismissals Review: The anticipated 'go live' date remains spring/summer 2025 with a focus on:

- Presumption for dismissal when Gross Misconduct identified.
- Accelerated hearings for former officers
- Performance regulations to be reformed.

# City of London Complaint Data



	Summary of public complaints data – Q4 2024/25					
Metric	Current quarter (Q4)	Previous quarter (Q3)	Previous year (Q4)	(%) change (Q on Q)	(%) change (Y on Y)	Comment
Complaints – Schedule 3	14	4	11	250%	27%	A total of 41 cases were logged in Q4 2024/25. This is the same as Q3 2024/25
Complaints – not Schedule 3	27	37	42	27%	36%	The average number of cases logged over the previous 5 quarters is 39 per quarter, Q4 is above average.
Allegations	89	70	60	27%	48%	There were 89 allegations recorded in Q4 2024/25. This is an increase of 19 allegations from Q3 2024/25  The average number of allegations over the previous 5 quarters is 61 per quarter. Q4 is above average.
Average time to log complaints (days)	N/K (await IOPC)	2	3	%	%	<i>Timeliness is taken from IOPC published</i>



	bulletin Q4)					bulletins and available retrospectively, unavailable dataset from Centurion.
Average time to contact complainant (days)	N/K	3	11	%	%	
Complaints finalised – Schedule 3	10	9	27	11%	63%	
Complaints finalised - not Schedule 3	25	36	56	31%	55%	
Average time to finalise complaint cases (days) – Schedule 3 (NOT including subjudice cases)	N/K	112 (Q3 YTD)	150 (Q4 2023/24 YTD)	%	%	Timeliness is taken from IOPC published bulletins and available retrospectively.
Average time to finalise complaint cases (days) – not Schedule 3	N/K	42	84	%	%	Q4 2024/25 is not yet published at time of writing
Applications for review sent to local policing body	N/K	2	1	%	%	
Applications for review sent to IOPC	N/K	1	5	%	%	
	<b>Nature of allegations –</b> Of the 89 allegations recorded during Q4 2024/25 the highest number were in the categories of Police Action following contact (13) General level of service (11) Impolite language / tone (11) Handling of/or damage to property (7) Bail, Identification & interview (7)					

This is an increase in allegations recorded against Q3 of 19

Allegation types: The top five allegation types at the end of 2024/25 are as follows:-

Police action following contact 17%

Impolite language / tone 11%

General level of service 9%

Handling of or damage to property/premises 9%

Information 6%

Q4 2024/25 contains 4 out of the above top allegation types. Police action following contact remains the highest allegation category and equates for 15% of all allegations logged.

Power to arrest and detain and Use of Force have both dropped out of the top allegations at the end of the 2024/25 data. General level of Service and Police action following contact have featured in the annual top 5 data 2022/23, 2023/24 and 2024/25.

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

38% of complainant's ethnicity is recorded as Unknown and 9% 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.

Since January 2025, the complaints team have been piloting a new EDI link. This link is sent to complainants to explain the importance of why we collect ethnicity data. Unfortunately this has also had a low response rate (4 responses).

There were three allegations (within 3 cases - 2 Non-schedule 3 and 1 Schedule 3) of Discriminatory Behaviour logged during this reporting period. (All Race allegations)

	Summary of internal conduct cases and investigations– Q4 2024/25			
Metric	Number	Previous quarter (Q3)	# (%) change (Q on Q)	Comment
New conduct investigations recorded	9	0	900%	
Total live conduct investigations	36	31	16%	Total live cases of which a number are sub-judice
<i>o.w. gross misconduct</i>	18	25	28%	
Conduct investigations finalised	5	1	400%	
Investigations finalised within <30 days	5	0	500%	
Officers and staff on suspension	11	16	31%	Includes officer under IOPC investigation
Officers and staff on restricted duties	5	7	29%	Includes officer under IOPC investigation
IOPC independent investigations	5	5	no change %	Includes Westminster attack
	<p><b><u>Accelerated misconduct meetings held Q4 – None</u></b></p> <p><b><u>Misconduct meetings / hearings held Q4</u></b></p> <p><u>Misconduct Hearing</u> - Case to answer - Breach types - Authority respect and courtesy - Confidentiality. Gross misconduct outcome was reached, the officer was dismissed and placed on barred list.</p> <p><u>Misconduct meeting</u> - Case to answer - breach types - Orders &amp; Instructions and Duties &amp; Responsibilities - Outcome - Written Warning.</p>			

## **Conclusion**

25. In conclusion, the data presented highlights notable trends and developments within complaints, conduct investigations, and the progress of the Professional Standards Directorate (PSD) during both Q4 and 2024/25 overall. Comparative data against 2023/24 to 2024/25 shows a reduction on complaint data of 12% cases logged. Allegations logged a 3% reduction. This would indicate that whilst complaints have reduced overall, there are more allegations within the cases so an indication of complexity to investigate.
26. Allegations of “Use of Force” have remained key focus areas for improvement and the delivery of Public & Personal safety training (PPST) within a Force dedicated bespoke facility over two days mandatory training since April 2024 has seen this improvement. New conduct cases have returned this quarter, and ongoing sub-judice misconduct cases signal potential increases in misconduct hearings as legal proceedings conclude.
27. Vetting operational delivery has continued to improve as outlined in the Vetting Action Plan (para 22). Implementation of regulatory changes will continue to be the focus of next quarter.

## **Report Authors**

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