

City of London Corporation Committee Report

Committee(s): Professionalism and Trust Committee – For Information	Dated: 14 October 2025
Subject: Professional standards, conduct, and vetting Update Q1	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 in Q1 in comparison to Q4 (by 20 cases 49%). However, this remains below the national average in accordance to IOPC data. There have been 22 new Conduct Cases recorded this quarter (an increase of 13 (144%) from Q4).
- 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. Our forecasting expects that this may amount to four Gross Misconduct hearings over the next 6 months.
- Progress across the Vetting Action Plan has seen a shift in completed recommendations from 69% last quarter to 80% this quarter.

Recommendations

Members are asked to:

- Note the report.

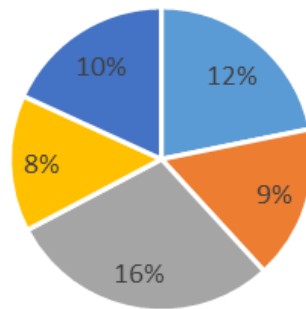
Main Report

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

• Complaint volumes, content, and performance –

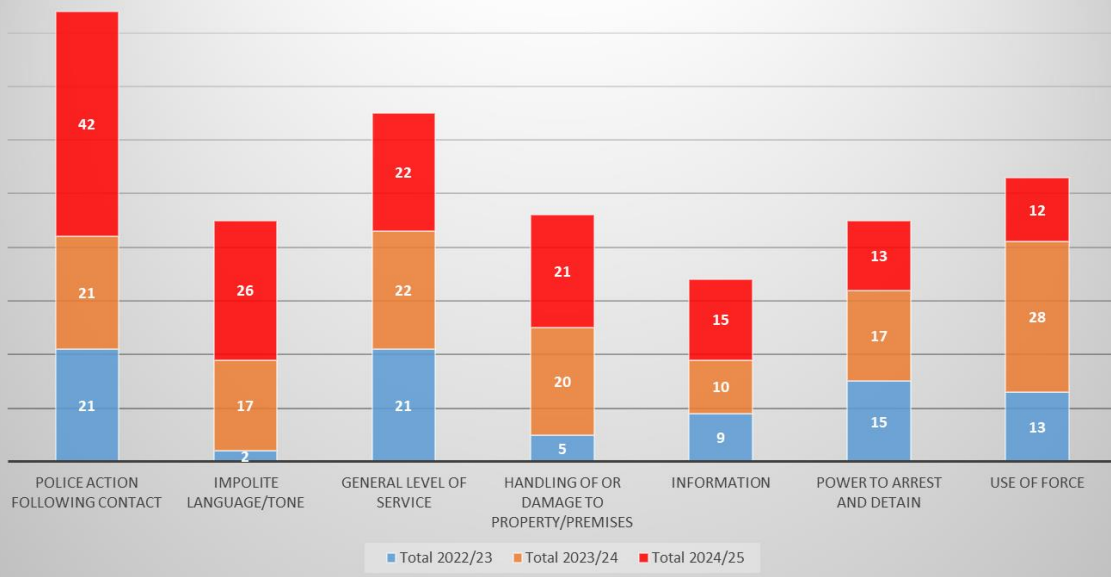
1. This document contains the statistics prepared by the Professional Standards Directorate for the first quarter of 2025/26 (April-June).
2. This quarter the total number of CoLP complaint cases logged is 61.
3. This is separated into 17 dealt with under Schedule 3 of the Police Reform Act 2002 and 44 not within Schedule 3. This figure of 61 complaints is an increase of 20 cases compared against Q4 where a total of 41 complaints were logged: 14 under Schedule 3, and 27 not within Schedule 3. Compared against the same period (Q1) last year 2024/25 the total number of CoLP complaint cases logged was 30. (4 Schedule 3 and 26 not within Schedule 3).
4. Of the 93 allegations recorded during Q1 2025/26 the highest number were in the categories of: General level of service (15) Police action following contact (11) Impolite language and tone (9) Information (8) Power to arrest & detain (7)
5. This is an increase in allegations recorded against Q4 of 4 (4%).
6. Q1 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, Information and Impolite language and Tone.
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.
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. Power to arrest and detain has returned to the quarterly top 5 this period.

Q1 Top 5 Allegations - 2025/26



■ Police action following contact ■ Information
■ General level of service ■ Power to arrest and detain
■ Impolite language/tone

Top Allegation categories previous three years. 2022/2025



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 2024/25 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.

Q1 – Data examination: -

10. Analysis of the highest allegation categories (the latest Q1 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 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 Q1 40% Organisational type allegations were recorded (Q4 = 37%)
11. The total number of allegations finalised during Q1 is 93 compared to 66 in the previous quarter.
12. Of the 93 allegations finalised:
 - 28 Resolved
 - 48 Service provided was acceptable
 - 1 Service Not acceptable
 - 3 Not resolved/No further action
 - 3 No case to answer
 - 8 No further action
 - 2 De Recorded
13. The one allegation finalised where the Service provided was NOT acceptable relates to one case. Allegation type – Bail, identification and interview procedures.
14. To note, cases often contain more than one allegation; the number of cases finalised in Q1 is 51, compared to 35 finalised in Q4.
15. Of the cases finalised 16 were logged as Schedule 3, and 35 were not under Schedule 3. There were no cases finalised under the previous regulations.
 - **Conduct volumes, content, and performance –**
16. During this quarter, 22 conduct investigations were recorded, and 11 investigations were finalised. There are currently 45 live conduct investigations, of which 20 have been assessed as Gross Misconduct. Of the matters assessed as Gross Misconduct – Discreditable conduct is the highest allegation type and as previously predicted are moving away from matters of a sexual nature. The discreditable conduct matters are varied and include disclosure, social media use and behaviour(s) with colleagues. Most of these cases are complex and subject to lengthy investigation timescales. Newer conduct matters are varied and appear to be moving away from this allegation type and into Honesty and Integrity matters or Authority, Respect and Courtesy.
17. In total 11 Conduct matters have been finalised (Hearings/Meetings may have been held in a previous quarter):
 - 1 case – Case to answer – Misconduct Hearing – Officer dismissed

- 1 case – Case to answer – Misconduct meeting – Reflective practice.
- 1 case – Case to answer - Stage 3 proceedings – Staff member dismissed.
- 5 cases – No case to answer – Reflective practice provided.
- 3 cases – No case to answer – No action.

18. During Q1 one Stage 3 Proceedings meeting was held with an allegation of Discreditable conduct. The staff member was dismissed without notice. One Misconduct meeting was held with the allegation of Use of Force. The outcome was reflective practice for the officer.

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

- (i) The most recent HMICFRS report into the effectiveness of vetting and counter-corruption arrangements in the City of London Police was conducted in force in October 2022 and published in June 2023. It graded the force as Requires Improvement in this area.

The department is now preparing for a HMICFRS Integrity Inspection due in 2026 (date not known however this could be from January 2026 onwards). In preparation, a Readiness Assessment has been completed against the HMICFRS assessment of 'Good'.

These recommendations are being progressed through a dedicated Action Plan with fortnightly Senior Leadership oversight and monthly reporting to Organisational Improvement Board.

- (ii) PSD have some evaluation gaps in understanding the impact of pro-active engagement work. We are reviewing good practice recommended to other forces by the HMICFRS which includes:

- Training attendance to PSD and ICOD sessions and evaluation tools to understand the impact the training had on individuals.
- Scenario-based PSD case studies focused on areas of concern highlighted through conduct data. This would involve a 3 stage-process:
 - 1) Scenario sent out to whole workforce to select one of a selection of options of how they would deal with a particular incident. This will provide a baseline understanding of how well employees understand the area of concern and what action they would take.
 - 2) Intervention through engagement on the topic area.
 - 3) Re-run of the scenario to track improvements around understanding and action taken.

Vetting:

19. The continuous improvement Action Plan for Vetting established in summer 2024 maintains to progress, with tangible improvements relating to productivity and service delivery. Currently, 80% of the actions set have been completed, and 20% 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.

Overview of Action Plan:

Actions	RAG Rating				Total
	Very High	High	Medium	Low	
Number of Actions	3	22	15	5	40
% of Total	15%	55%	37.5%	12.5%	100%
Completed	1	19	9	3	80 (%)
In Progress	2	2	3	1	20 (%)
Not Started	-	-	-	-	0

II. Forward look

20. Annual PSD Conference: On 6 and 7 October 2025, members of PSD SLT will be attending the national PSD conference. The conference will have updates from the Home Office on key national updates and the HMICFRS on upcoming force Integrity inspections.

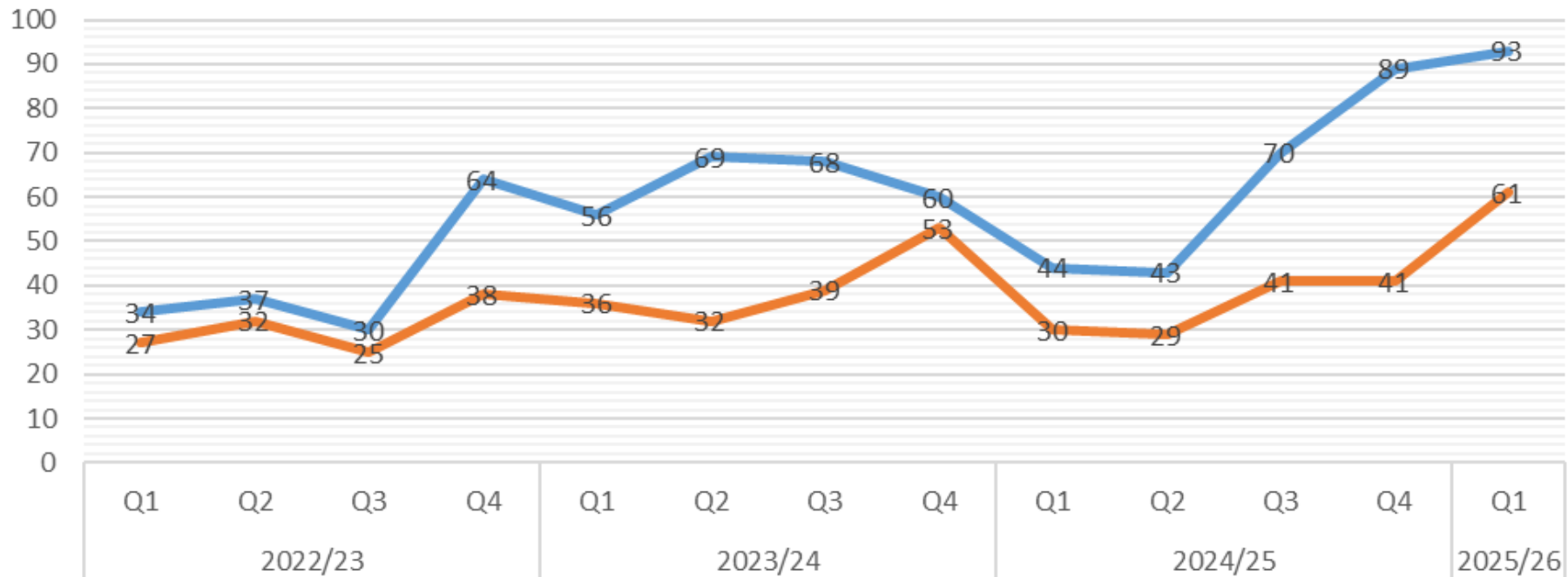
21. PSD Protect Engagement work:

As part of our response to the Angiolini Inquiry (Part 1) and broader work to support women in the workplace who experience misogyny or male-perpetrated abuse, PSD are hosting a listening circle. The session will be focused to understand how women feel about existing reporting structures in place and any barriers to raising concerns.

The listening circle is scheduled for 29th September 2025.

City of London Complaint Data

CoLP Allegations Recorded/logged CoLP Complaints Cases Logged



	Summary of public complaints data – Q1 2025/26					
Metric	Current quarter (Q1)	Previous quarter (Q4)	Previous year (Q1)	(%) change (Q on Q)	(%) change (Y on Y)	Comment
Complaints – Schedule 3	17	14	4	21%	325%	A total of 61 cases were logged in Q1 2025/26. This is an increase of 20 cases (49%) against Q4 2024/25
Complaints – not Schedule 3	44	27	26	63%	69%	The average number of cases logged over the previous 5 quarters is 40 per quarter, Q1 is above average.

Allegations	93	89	44	4%	111%	<p>There were 93 allegations recorded in Q1 2025/26. This is an increase of 4 allegations from Q4 2024/25</p> <p>The average number of allegations over the previous 5 quarters is 68 per quarter. Q1 is above average.</p>
Average time to log complaints (days)	4	4	1	0%	300%	<p><i>Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.</i></p>

Average time to contact complainant (days)	4	4	1	0%	300%	
Complaints finalised – Schedule 3	16	10	3	60%	433%	
Complaints finalised - not Schedule 3	35	25	13	40%	169%	
Average time to finalise complaint cases (days) – Schedule 3 (including subjudice time)	93	115	112 (Q1 2024/25 YTD)	19%	17%	<i>Timeliness is taken from IOPC published bulletins and available retrospectively.</i>
Average time to finalise complaint cases (days) – not Schedule 3	19	36	37	47%	49%	<i>Q1 2025/26 data is available at time of writing but not published due to lack of national data</i>
Applications for review sent to local policing body	1	2	1	50%	0%	
Applications for review sent to IOPC	0	4	1	100%	100%	
	<p>Nature of allegations – Of the 93 allegations recorded during Q1 2025/26 the highest number were in the categories of General level of service (15) Police Action following contact (11) Impolite language / tone (9) Information (8) Power to arrest & detain (7)</p> <p>This is an increase in allegations recorded against Q4 of 4</p>					

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%

Q1 2025/26 contains 4 out of the above top allegation types. Police action following contact remains the highest allegation category and equates for 12% of all allegations logged.

Power to arrest and detain had dropped out of the top allegations at the end of the 2024/25 data, however has returned to the top 5 in Q1.

General level of Service and Police action following contact have featured in the annual top 5 data 2022/23, 2023/24 and 2024/25.

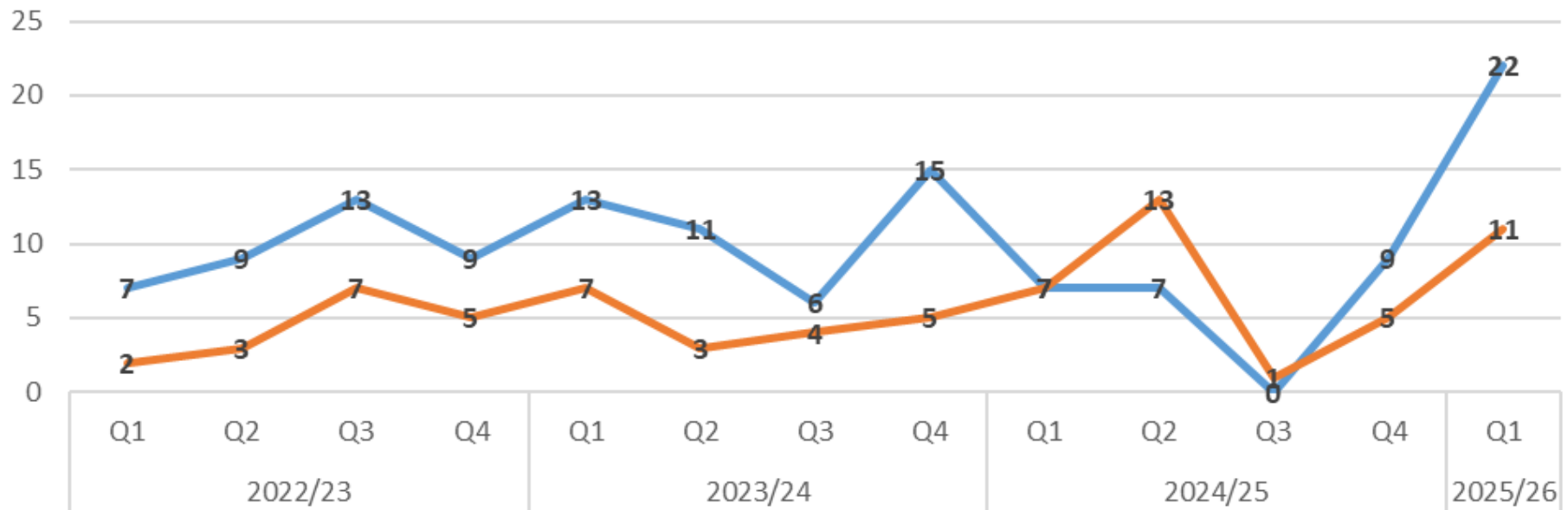
Ethnicity and discriminatory behaviour –

20% of complainant's ethnicity is recorded as Unknown and 22% 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.

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

City of London Conduct Data

Conduct Cases Recorded Conduct Cases Finalised



Summary of internal conduct cases and investigations– Q1 2025/26				
Metric	Number	Previous quarter (Q4)	# (%) change (Q on Q)	Comment
New conduct investigations recorded	22	9	144%	
Total live conduct investigations	45	36	25%	Total live cases of which a number are sub-judice
<i>o.w. gross misconduct</i>	20	18	11%	Live cases
Conduct investigations finalised	11	5	120%	
Investigations finalised within <30 days	4	5	20%	
Officers and staff on suspension	14	11	%	Includes officer under IOPC investigation
Officers and staff on restricted duties	6	5	%	Includes officer under IOPC investigation
IOPC independent investigations	3	5	40%	

Accelerated misconduct meetings held Q1

None held

Misconduct meetings / hearings held Q1

Misconduct Hearing - None held

Stage 3 Proceedings (staff) - Discreditable conduct - staff member dismissed without notice

Misconduct meeting - One held. Use of Force - outcome - Reflective practise

Conclusion

22. 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 Q1 and compared to previous yearly data overall. Comparative data against 2023/24 to 2024/25 shows an increase on both complaint data and conduct matters. However, complaint numbers per employee remains below national average.
23. Allegations of “Impolite language/tone” have remained key focus areas for improvement. Several cases have been reviewed through BWV, in some instances it was identified that greater professionalism in communication is required. This has been raised through the PSD Working Group directly to senior PSD SPOCs and will be a feature on future engagement sessions.
24. Of the 93 allegations recorded during Q1 2025/26 the highest number were in the categories of General level of service (15) Police Action following contact (11) Impolite language / tone (9) Information (8) Power to arrest & detain (7)
25. Vetting operational delivery has continued to improve as outlined in the Vetting Action Plan. We continue to implement regulatory and APP changes, and ensure compliance in all areas through our PSD Performance Management framework.

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**)