

# City of London Corporation Committee Report

<b>Committee(s):</b> Professionalism and Trust Committee – For Information	<b>Dated:</b> <b>2<sup>nd</sup> December 2025</b>
<b>Subject:</b> Professional standards, conduct, and vetting Update Q2	<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 decreased in Q2 in comparison to Q1 (by 8 cases 13%). However, this remains below the national average in accordance with IOPC data.
- There have been 19 new Conduct Cases recorded this quarter (a decrease of 3 (14%) from Q1).
- 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 change in the number of completed recommendations from 80% last quarter to 65% this quarter. This is attributed to some actions being re-opened to reflect additional levels of assurance

required by our service improvement team in readiness for our HMICFRS Integrity Inspection.

## **Recommendations**

Members are asked to:

- Note the report.

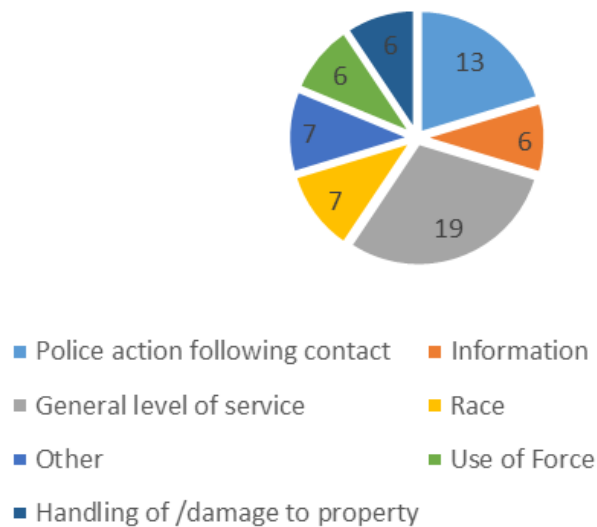
## **Main Report**

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

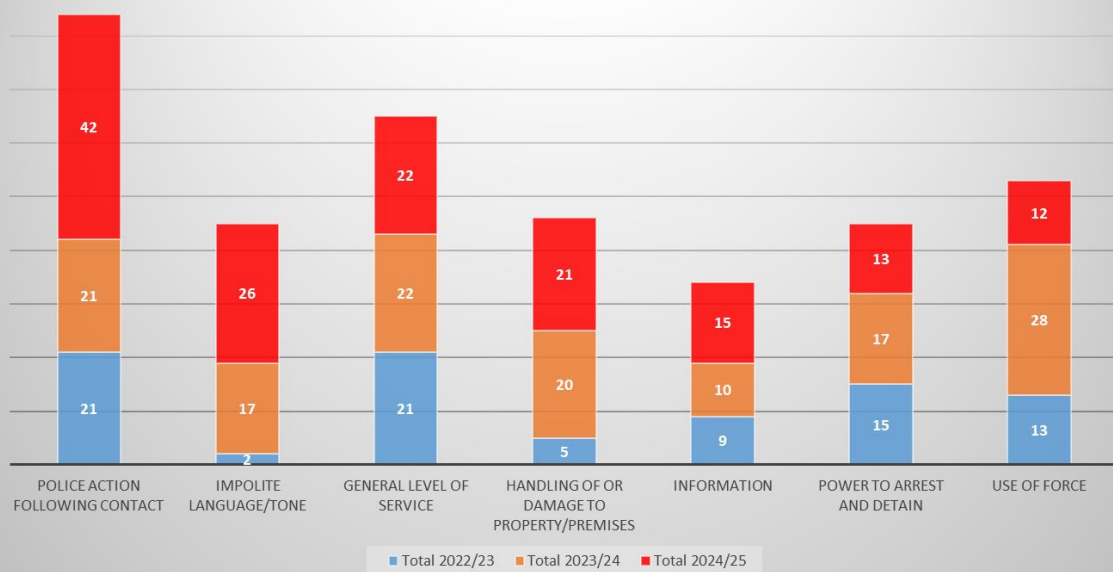
- **Complaint volumes, content, and performance –**

1. This document contains the statistics prepared by the Professional Standards Directorate for the second quarter of 2025/26 (July-Sept).
2. This quarter the total number of CoLP complaint cases logged is 53.
3. This is separated into 14 dealt with under Schedule 3 of the Police Reform Act 2002 and 39 not within Schedule 3. This figure of 53 complaints is a decrease of 8 cases compared against Q1 where a total of 61 complaints were logged: 17 under Schedule 3, and 44 not within Schedule 3. Compared against the same period (Q2) last year 2024/25 the total number of CoLP complaint cases logged was 29. (9 Schedule 3 and 20 not within Schedule 3).
4. Of the 94 allegations recorded during Q2 2025/26 the highest number were in the categories of: General level of service (19) Police action following contact (13) Race (7) Other (7) Information (6) Use of Force (6) Handling/damage to Property (6).
5. This is an increase in allegations recorded against Q1 of 1 (1%).
6. Q2 has 3 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.

Top 5 allegations Q2 2025-26



Top Allegation categories previous three years. 2022/2025



- 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.

This is also being supplemented by a new PSD Learning Forum which on a monthly basis reviews all learning from the IOPC, NPCC, Home Office, external agencies and

case law. This ensures that learning and changes to practice are disseminated to the appropriate oversight area and implemented without delay.

Q2 – Data examination: -

10. Analysis of the highest allegation categories (the latest Q2 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 Q2 46% Organisational type allegations were recorded (Q1 = 40%)
11. The total number of allegations finalised during Q2 is 86 compared to 93 in the previous quarter.
12. Of the 86 allegations finalised:
  - 34 Resolved
  - 32 Service provided was acceptable
  - 1 Service Not acceptable
  - 11 Not resolved/No further action
  - 4 Not determined
  - 2 No further action
  - 2 Withdrawn
13. The one allegation finalised where the Service provided was NOT acceptable relates to one case. Allegation type – Other.
14. To note, cases often contain more than one allegation; the number of cases finalised in Q2 is 52, compared to 51 finalised in Q1.
15. Of the cases finalised 18 were logged as Schedule 3, and 34 were not under Schedule 3. There were no cases finalised under the previous regulations.

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

16. During this quarter, 19 conduct investigations were recorded, and 8 investigations were finalised. There are currently 58 live conduct investigations, of which 28 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 8 Conduct matters have been finalised (Hearings/Meetings may have been held in a previous quarter):

- 7 cases – No case to answer
- 1 case – Discontinued

18. During Q2, one Misconduct Hearing and one Misconduct Meeting were held.

The misconduct hearing had a finding of Gross Misconduct with the allegations of Discreditable conduct and Authority, respect and courtesy. The outcome was a 5-year written warning. The misconduct meeting allegations were Duties and responsibilities, which were not proven. However, Reflective Practice and learning was advised by the chair.

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

- (i) The Professional Standards Department continues to prepare for a HMICFRS Integrity Inspection (due in 2026). A Readiness Assessment, completed by our service improvement team was inducted in September 2025 which benchmarked current performance against the HMICFRS assessment of 'Good'.

The Readiness Assessment identified 41 recommendations, progress is outlined below:

Red/Amber risk of High/Intermediate	In Progress	Complete
Red (17 recommendations)	9	8
Amber (24 recommendations)	13	11

Total complete: 19

Total in progress: 22

Progress across these recommendations is being overseen by a dedicated Inspector within PSD, reporting directly to the Head of PSD. Departmental performance in this area is held to account through weekly Readiness Assessment progress meetings with the Head of PSD, monthly departmental performance meetings, monthly reporting to Deputy Commissioner Betts and reporting to the Organisational Improvement Board.

## HMICFRS Integrity Inspection Methodology

The national HMICFRS Integrity inspection framework comprises three (3) thematic areas with a total of six (6) question areas as shown in the table below.

Integrity Framework	Question Area(s)
<b>Thematic Area #1 VETTING</b> Vetting police officers and staff	1. How effectively does the force vet its officers and staff?
<b>Thematic Area #2 PSD</b> Upholding the standards of professional behaviour	2. How effectively does the force promote high standards of behaviour in its workforce? 3. How effectively does the force identify, handle, and investigate potential breaches of <u>the standards of professional behaviour</u> ? 4. Does the force hold police officers and staff accountable for their behaviour in a way that is proportionate, fair, and consistent?
<b>Thematic Area #3 CCU</b> Tackling potential corruption	5. How effectively does the force protect the information it holds? 6. How effectively does the force tackle corruption (including potential corruption)?

From April 2024, the HMICFRS have completed nine inspections, the performance is summarised across the three thematic areas:

- 1) Vetting:
  - 6 forces graded as Requiring Improvement
  - 2 forces graded as Adequate
  - 1 force graded as Good
- 2) PSD:
  - 7 forces graded as Requiring Improvement
  - 2 forces graded as Adequate
  - 0 force graded as Good
- 3) CCU:
  - 6 forces graded as Requiring Improvement
  - 2 forces graded as Adequate
  - 1 force graded as Good

These reports are publicly available, and PSD has reviewed each report to identify lessons learned and good practice.

A re-run of the Readiness Assessment by the service improvement team will be completed in December which will formally re-assess progress.

### **Vetting:**

19. The continuous improvement Action Plan for Vetting established in summer 2024 maintains progress and a number of the actions are also captured within our HMICFRS readiness assessment. Last quarter 80% of actions were reported as completed. The updates of these actions remain consistent, however with support from the service improvement team we have adopted a higher level threshold of compliance, meaning that some actions have been re-opened for further work. This has brought the completed actions back to 65%, however we anticipate that the figure will increase significantly next quarter as the additional work required for assurance will have been completed.

### **Overview of Action Plan:**

Actions	RAG Rating				Total
	Very High	High	Medium	Low	
Number of Actions	3	20	13	4	40
% of Total	7.5%	50%	32.5%	10%	100%
Completed	1	16	5	4	65 (%)
In Progress	2	4	9	0	35 (%)
Not Started	-	-	-	-	0

### **Forward look**

#### **Engagement:**

A Listening Circle took place in September, specifically focused on inappropriate behaviour from men towards female employees. This was well attended and has helped inform future engagement work through feedback and recommendations.

One area identified was the need for increased peer support across directorates. PSD already have a SPOC (Specified Point of Contact) in each directorate however these are at a senior level with a more strategic function. PSD are working with ICOD to explore having P&T Professionals at a more operational level who can offer support, advice and sign-post.

The first dilemma poll was released in November which gave all employees a scenario involving improper sexualised off-duty behaviour. The theme of the

scenario is informed by areas of priority within our PSD Counter-Corruption Control Strategy.

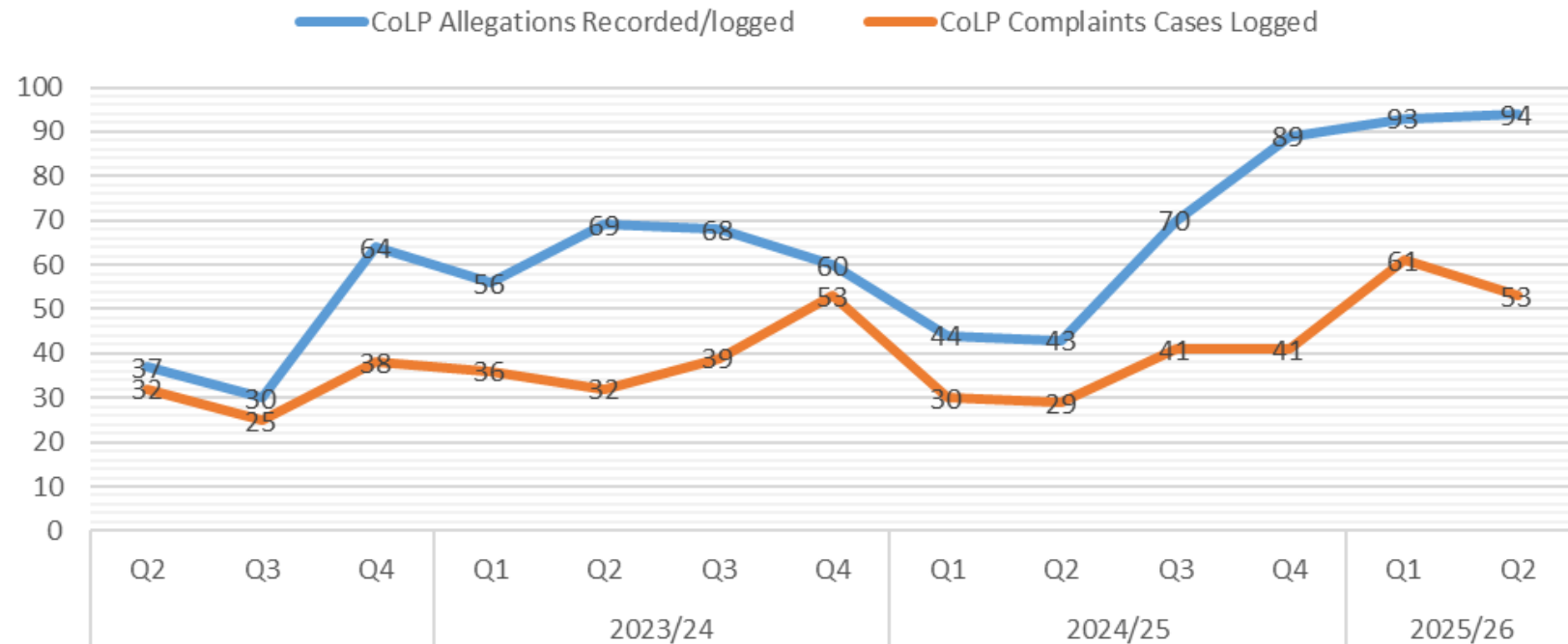
Employees were asked to vote on what action they would take first. The results will be collated 14 days after the poll released and will inform what training and engagement is required, this will be rolled out over the next two months. A follow-up dilemma poll with a similar scenario will be sent out following this and will track improvements in knowledge and behaviour.

### **Control Strategy:**

The Counter-Corruption Unit are publishing their updated Control Strategy (at time of writing). This has been formulated using data attributed to matters reported to PSD and intelligence. The Control Strategy identifies the biggest risk areas to the organisation based on this and sets priority areas of focus for PSD. The Control Strategy has a 'call to action' which outlines the responsibility for all employees to protect the organisation and each other from corruption risks.



# City of London Complaint Data



	Summary of public complaints data – Q2 2025/26					
Metric	Current quarter (Q2)	Previous quarter (Q1)	Previous year (Q2)	(%) change (Q on Q)	(%) change (Y on Y)	Comment
Complaints – Schedule 3	14	17	9	18%	56%	A total of 53 cases were logged in Q2 2025/26. This is a decrease of 8 cases (13%) against Q1 2025/26

Complaints – not Schedule 3	39	44	20	11%	95%	The average number of cases logged over the previous 5 quarters is 40 per quarter, Q2 is above average.
Allegations	94	93	43	1%	119%	There were 94 allegations recorded in Q2 2025/26. This is an increase of 1 allegation from Q1 2025/26

						The average number of allegations over the previous 5 quarters is 68 per quarter. Q2 is above average.
Average time to log complaints (days)	N/K	4	1			Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.
Average time to contact complainant (days)	N/K	4	1			
Complaints finalised – Schedule 3	18	16	7	13%	157%	Total of 52 cases were finalised in Q2. This is an increase of

Complaints finalised - not Schedule 3	<b>34</b>	<b>35</b>	<b>20</b>	<b>1%</b>	<b>70%</b>	1 case from Q1 2025/26
Average time to finalise complaint cases (days) – Schedule 3 (including subjudice time YTD)	<b>N/K</b>	<b>93</b>	<b>110</b>			<p><i>Timeliness is taken from IOPC published bulletins and available retrospectively.</i></p> <p><i>Q2 2025/26 data is not available at time of writing</i></p>

Average time to finalise complaint cases (days) – not Schedule 3 (YTD)	N/K	19	43			
Applications for review sent to local policing body	0	1	0	0%	100%	
Applications for review sent to IOPC	0	0	0	0%	0%	
	<p><b>Nature of allegations –</b> Of the 94 allegations recorded during Q2 2025/26 the highest number were in the categories of General level of service (19) Police Action following contact (13) Race (7) Other (7) Information (6) Use of Force (6) Handling/Damage to property (6)</p> <p>This is an increase in allegations recorded against Q1 of 1</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%

Q2 2025/26 contains 3 out of the above top allegation types. General level of service was highest at 20% this quarter. Police action following contact remains in the highest allegation categories and equates for 13% of all allegations logged in Q2.

Handling of/and or damage to property had dropped out of the top allegations in Q1 2025/26, however has returned to the top 5 in Q2.

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

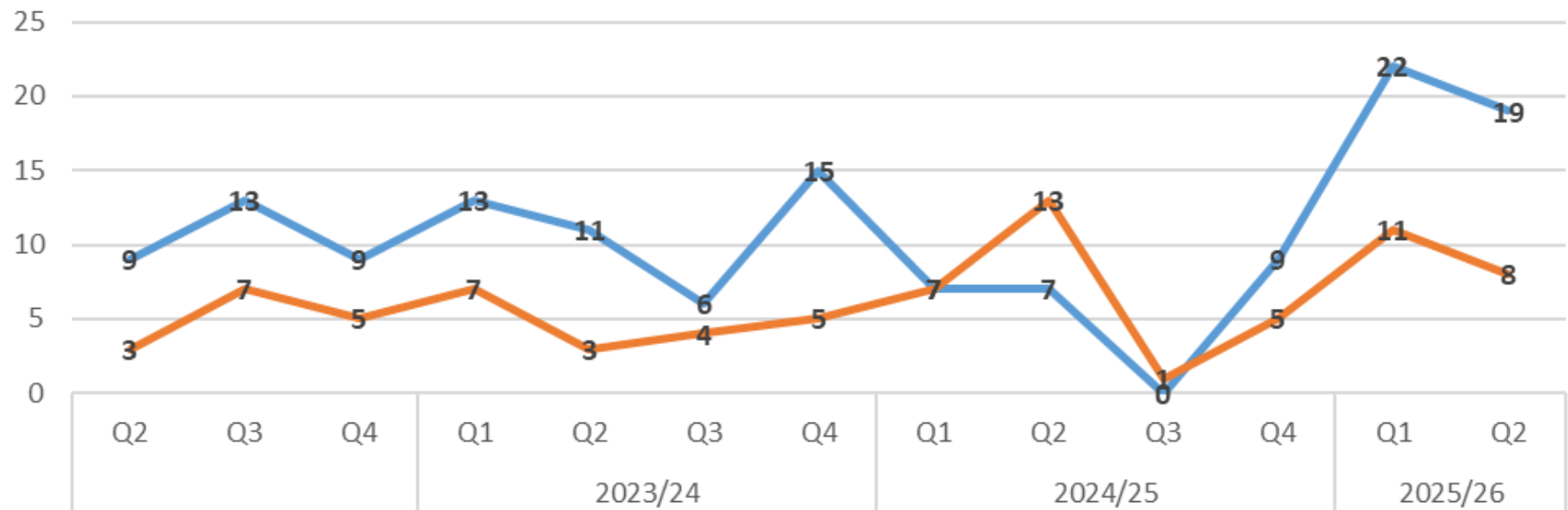
### **Ethnicity and discriminatory behaviour –**

33% 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.

There were eight allegations (within 5 cases - 2 Non-schedule 3 and 6 Schedule 3) of Discriminatory Behaviour logged during this reporting period. (7 Race and 1 Disability allegations)

# City of London Conduct Data

Conduct Cases Recorded      Conduct Cases Finalised





	Summary of internal conduct cases and investigations– Q2 2025/26			
Metric	Number	Previous quarter (Q2)	# (%) change (Q on Q)	Comment
New conduct investigations recorded	19	22	14%	
Total live conduct investigations	58	45	29%	Total live cases of which a number are sub-judice
<i>o.w. gross misconduct</i>	28	20	40%	Currently assessed within Live cases

Conduct investigations finalised	8	11	27%	
Investigations finalised within <30 days	6	4	50%	
Officers and staff on suspension	13	11	18%	Includes officer under IOPC investigation
Officers and staff on restricted duties	7	5	40%	Includes officer under IOPC investigation

IOPC independent investigations	3	3		No change
	<p><b><u>Accelerated misconduct meetings held Q2</u></b></p> <p>None held</p> <p><b><u>Misconduct meetings / hearings held Q2</u></b></p> <p><u>Misconduct Hearing</u> – One held. Gross Misconduct - allegations Discreditable conduct and Authority, respect and courtesy. Outcome was a 5-year written warning imposed.</p> <p><u>Stage 3 Proceedings</u> - None held.</p> <p><u>Misconduct meeting</u> – One held. Allegations Duties and responsibilities, Outcome - not proven. Reflective practise and learning were advised by the chair.</p>			

## **Conclusion**

20. 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 Q2 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.
21. Of the 94 allegations recorded during Q2 2025/26 the highest number were in the categories of: General level of service (19) Police action following contact (13) Race (7) Other (7) Information (6) Use of Force (6) Handling/damage to Property (6).
22. Preparation for a HMICFRS Integrity inspection is a key focus area for the department. Robust governance is in place to track performance and progress against the Readiness Assessment recommendations.

## **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**)