

City of London Corporation Committee Report

Committee(s): Professionalism and Trust Committee – For Information	Dated: 02/02/2026
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 Thomas Hill /PC Ann Roberts Professional Standards Dept	

Summary

- Overall, the volume of Complaints has decreased in Q3 in comparison to Q2 (by 10 cases, 19%). This remains below the national average in accordance with IOPC data.
- There have been 20 new Conduct Cases recorded this quarter (an increase of 1 (5%) from Q2).
- There remains a number of officers subject to long-term suspension. Many relate to misconduct cases held sub-judice awaiting results of long impending criminal investigations or trials. Our forecasting expects that this may amount to 4 Gross Misconduct hearings over the next 6 months.

Recommendations

Members are asked to:

- Note the report.

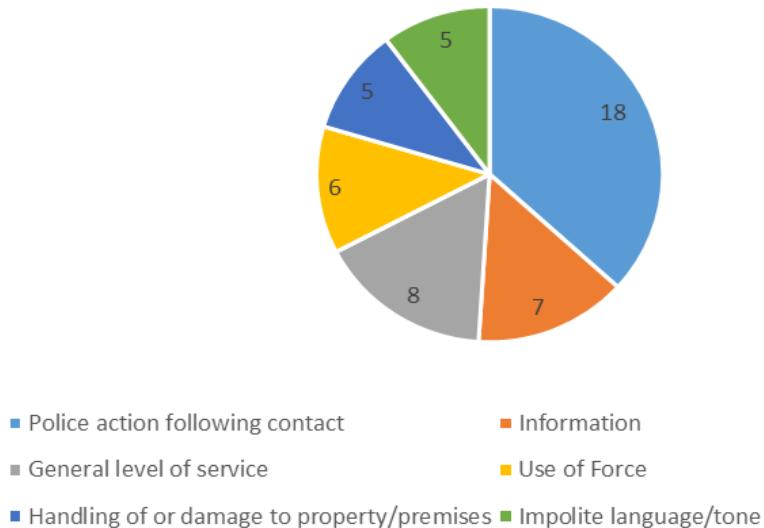
Main Report

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

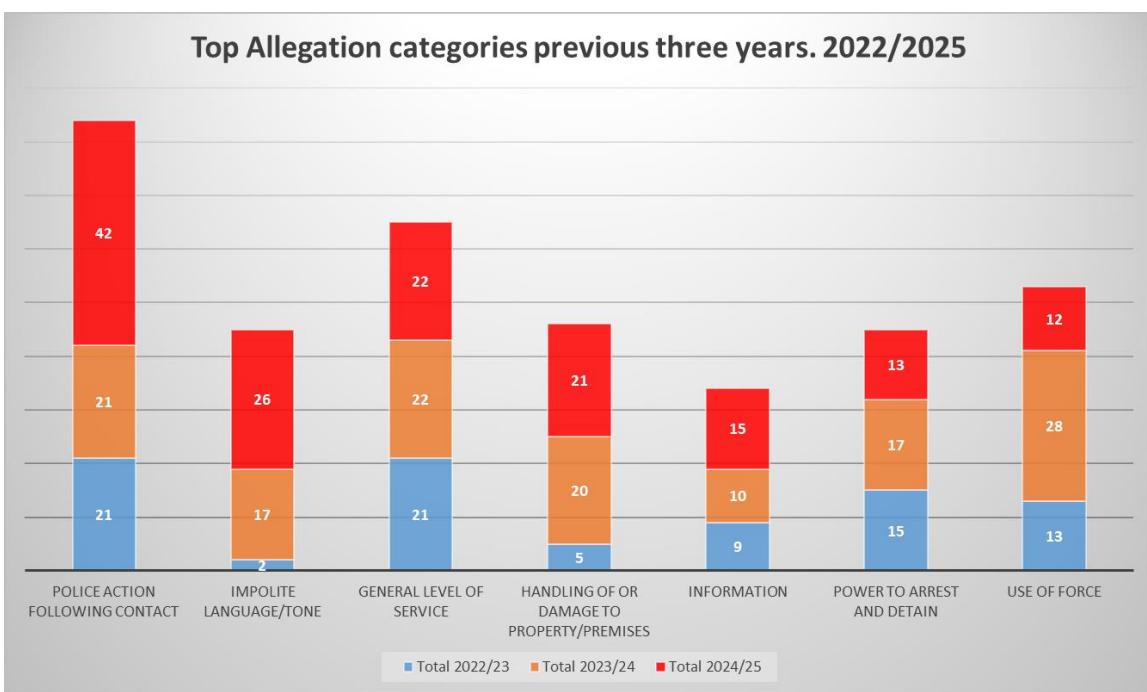
- **Complaint volumes, content, and performance –**

1. This document contains the statistics prepared by Professional Standards for the third quarter of 2025/26 (Oct-Dec).
2. This quarter the total number of CoLP complaint cases logged is 43.
3. This is separated into 13 dealt with under Schedule 3 of the Police Reform Act 2002 and 30 not within Schedule 3. This figure of 43 complaints is a decrease of 10 cases compared against Q2 where a total of 53 complaints were logged: 14 under Schedule 3, and 39 not within Schedule 3. Compared against the same period (Q3) last year 2024/25 the total number of CoLP complaint cases logged was 41. (4 Schedule 3 and 37 not within Schedule 3).
4. Of the 85 allegations recorded during Q3 2025/26 the highest number were in the categories of: Police action following contact (18) General level of service (8) Information (7) Use of Force (6) Handling/damage to Property (5) Impolite language and Tone (5).
5. This is a decrease in allegations recorded against Q2 of 9 (10%).
6. Q3 has six of the highest allegation type categories featured in the overall 'Top allegation types' against the full year 2024/25 data which are: General level of service, Police Action following contact, Information, Use of Force, Handling of Property 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.

Top 5 allegations Q3 2025-26



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.

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.

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 (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 Q3 39% Organisational type allegations were recorded (Q2 = 46%)
11. The total number of allegations finalised during Q3 is 76 compared to 86 in the previous quarter.
12. Of the 76 allegations finalised:
 - 37 Resolved
 - 29 Service provided was acceptable
 - 4 Service Not acceptable
 - 4 Not resolved/No further action
 - 2 Not determined
13. The four allegations finalised where the Service provided was NOT acceptable relates to two cases. Case 1: allegation types logged as Handling of property, Information & Unprofessional attitude. Case 2: allegation type logged General level of service.
14. To note, cases often contain more than one allegation; the number of cases finalised in Q3 is 44, compared to 52 finalised in Q2.
15. Of the cases finalised 13 were logged as Schedule 3, and 31 were not under Schedule 3. There were no cases finalised under the previous regulations.

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

16. During this quarter, 20 conduct investigations were recorded, and 6 investigations were finalised. There are currently 58 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 Discreditable conduct and into Honesty and Integrity matters or Authority, Respect and Courtesy

such as theft/fraud related matters i.e. inappropriate use of ATOC travel, selling of police equipment. Or bullying type matters.

17. In total 6 Conduct matters have been finalised (Hearings/Meetings may have been held in a previous quarter):

- 5 cases – No case to answer
- 1 case – Case to answer – no action.

18. Whilst some of these cases have returned a No case to answer result, there is often learning either for the individual or the organisation that has been identified during the investigation. These will also be picked up by the PSDWG.

19. During Q3, no Misconduct Hearings or Meetings were held.

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

20. 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 40 recommendations; progress is outlined below:

Se 2025 Actions		Complete	In Progress	
Red	16	14	2	
Amber	24	14	10	
Total in Completed		28/40	70%	
Dec 2025 Actions		Complete	In Progress	
Red	7	0	7	
Amber	5	0	5	
Total Completed		0/12	0%	

The Service Improvement Team re-visited PSD in December and confirmed closure of the above actions. A total of 12 new recommendations were identified which continue to be worked on. Some of the new actions may be slower to progress due to interdependencies, resourcing considerations and senior management approval.

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.

- **Vetting**

21. 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 threshold of compliance, meaning that some actions have been re-opened for further work. This has brought the completed actions back to 65% in Q2, and as anticipated, the figure significantly increased in Q3 with 80% of actions being reported as completed. The final actions are large pieces of work including introducing open-source software to increase speed in completing social media checks, linking Origin and Core-Vet, ensuring everyone working within Vetting has a 2 year FTC as minimum, and deleting a total of 55,000 records to ensure data quality, which would be around 1,000 hours of work.

Overview of Action Plan:

Actions	RAG Rating				Total
	Very High	High	Medium	Low	
Number of Actions	3	21	15	4	43
Completed	2	20	9	4	81 (%)
In Progress	1	1	6	0	19 (%)
Not Started	-	-	-	-	0

Operation Jorica

Recent national media coverage reported the findings of an independent review into historic vetting practices within the Metropolitan Police Service (MPS), identifying significant and systemic failures in recruitment and vetting controls over several years. During the police uplift programme (PUP) some individuals were risk managed into the organisation only after completing all local checks which assesses against force level risk to systems, data and people; while awaiting national security vetting results.

All City of London police officers and staff hold in date vetting to the correct level, except for six individuals currently either going through a withdrawal process or re-vetting process.

The use of risk managed entry is now only used in limited and exceptional cases once local checks and risk assessment have been completed. These exceptional cases must be authorised by Deputy Commissioner, Local.

The City of London vetting unit is APP compliant. This includes the introduction of annual integrity checks, annual integrity screening, randomised vetting checks, reviews and or re-vetting for all internal moves and promotions.

- **Forward look**

Engagement:

A Listening Circle took place in October 2025, prompted by the Panorama BBC documentary, to provide an outlet for staff concerns. This followed on from the successful Listening Circle in September 2025 which specifically focused on inappropriate behaviour from men towards female employees.

An area previously identified at a Listening Circle 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 Professionalism and Trust's (P&T) Inclusivity, Culture and Organisational Development (ICOD) team to explore utilising this team at a more operational level to offer support, advice and sign-post. This will give confidence and empower supervisors to challenge and deal with low level issues to prevent escalation. This will be supported by an interactive engagement session which will discuss how to challenge and address low level conduct that doesn't meet the misconduct threshold but undermines police standards and contributes to poor culture.

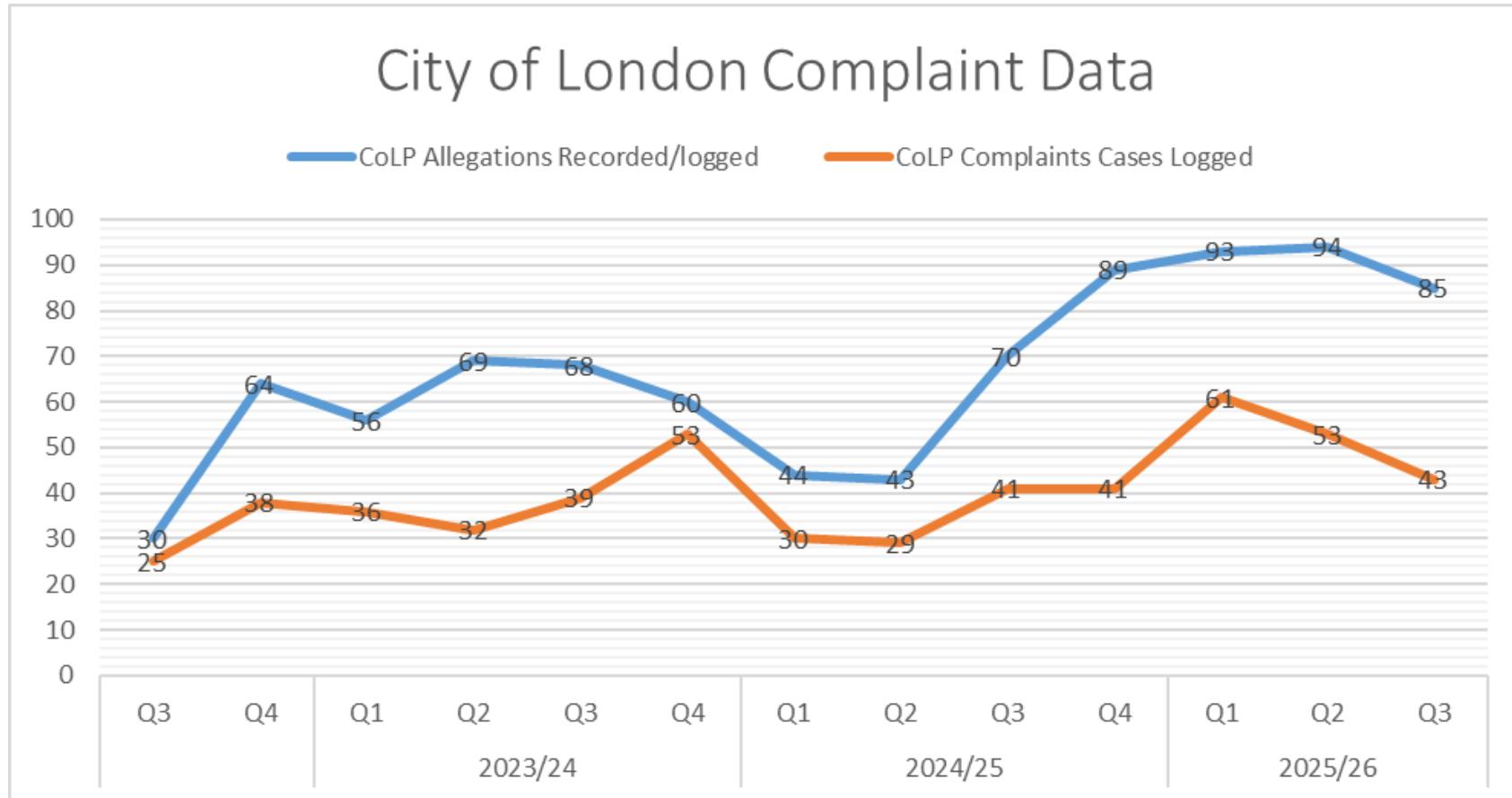
The first dilemma poll released in November 2025 gave all employees a scenario involving improper sexualised off-duty behaviour. Positive feedback was received and the theme of supervisor support for appropriately managing issues will be taken forward this quarter through a supervisor 'focus-on' session. The data has also been used to support further Active Bystander training for the force. To gain a more comprehensive picture a follow-up dilemma poll with a similar scenario will be sent out during the next quarter and will track improvements in knowledge and behaviour as a result of the first.

The second edition of our new-look Professionalism newsletter was published in December, an intentional timing for the festive season, a natural time for celebration. PSD published an important reminder about alcohol consumption and maintaining standards behaviour. Reenforcing CoLP journey to 'be one of the most inclusive and trusted police forces in the country', and in line with the Policing Plan 2025-28, and the vital part that we all continue to live our values of 'professionalism', 'integrity' and 'compassion' on and off-duty, when at work and in our personal lives.

The newsletter also contained:

- important updates related to professional standards and expectations on conduct and integrity.
- news recently shared by Professional Standards.
- lessons learnt from complaints and conduct cases in force and across the UK; and

- how to protect yourself and your colleagues, and how to report inappropriate behaviour and misconduct.



	Summary of public complaints data – Q3 2025/26					
Metric	Current quarter (Q3)	Previous quarter (Q2)	Previous year (Q3)	(%) change (Q on Q)	(%) change (Y on Y)	Comment
Complaints – Schedule 3	13	14	4	7%	225%	A total of 43 cases were logged in Q3 2025/26. This is a decrease of 10 cases (19%) against Q2 2025/26

Complaints – not Schedule 3	30	39	37	23%	19%	The average number of cases logged over the previous 5 quarters is 48 per quarter, Q3 is below average.
Allegations	85	94	43	10%	98%	There were 85 allegations recorded in Q3 2025/26. This is a decrease of 9 allegations from Q2 2025/26

Average time to log complaints (days)	N/K	4	1			<i>Timeliness is taken from IOPC published bulletins and available retrospectively, unavailable dataset from Centurion.</i>
Average time to contact complainant (days)	N/K	3	1			
Complaints finalised – Schedule 3	13	18	9	28%	44%	Total of 44 cases were finalised in Q3. This is a decrease of

The average number of allegations over the previous 5 quarters is 86 per quarter. Q3 is below average.

Complaints finalised - not Schedule 3	31	34	36	9%	14%	8 cases from Q2 2025/26
Average time to finalise complaint cases (days) – Schedule 3 (including subjudice time YTD)	N/K	76	110			<p><i>Timeliness is taken from IOPC published bulletins and available retrospectively.</i></p> <p><i>Q3 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	18	43			
Applications for review sent to local policing body	0	0	0	0%	0%	
Applications for review sent to IOPC	0	0	0	0%	0%	

Nature of allegations – Of the 85 allegations recorded during Q3 2025/26 the highest number were in the categories of Police Action following contact (18) General level of service (8) Information (7) Use of Force (6) Handling/Damage to property (5) Impolite language/tone (5)

This is a decrease in allegations recorded against Q2 of 9

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%

Q3 2025/26 contains all of the above top allegation types. Police action following contact was highest at 21% this quarter. Police action following contact remains the highest allegation category YTD.

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 and Q3.

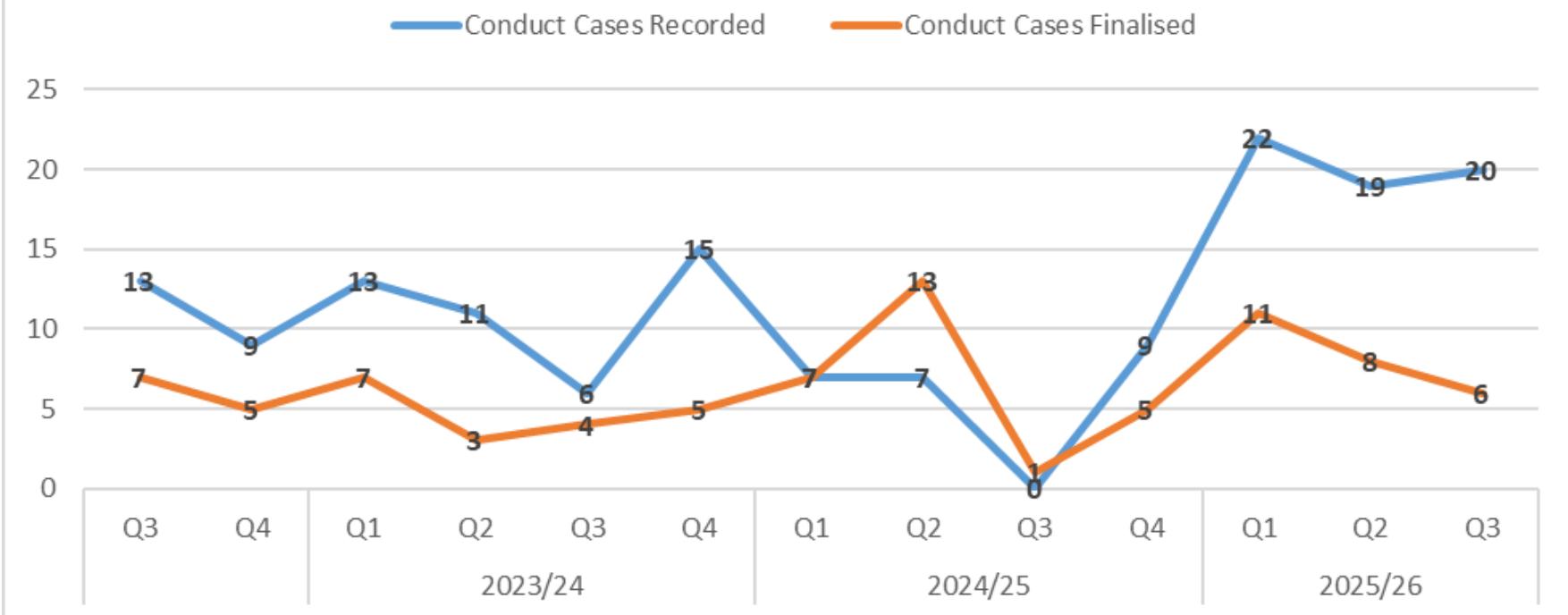
General level of Service and Police action following contact have featured in the annual top 5 data 2022/23, 2023/24 and 2024/25.

Ethnicity and discriminatory behaviour –

56% of complainant's ethnicity is recorded as Unknown and 2% 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 five allegations (within 5 cases - 2 non-schedule 3 and 3 Schedule 3) of Discriminatory Behaviour logged during this reporting period (4 Race and 1 Disability allegations).

City of London Conduct Data



	Summary of internal conduct cases and investigations– Q3 2025/26			
Metric	Number	Previous quarter (Q2)	# (%) change (Q on Q)	Comment
New conduct investigations recorded	20	19	5%	
Total live conduct investigations	59	58	2%	Total live cases of which a number are sub-judice
<i>Of which gross misconduct</i>	20	28	29%	Currently assessed within Live cases
Conduct investigations finalised	6	8	25%	
Investigations finalised within <30 days	6	6	0%	
Officers and staff on suspension	11	13	15%	Includes officer under IOPC investigation
Officers and staff on restricted duties	6	7	14%	Includes officer under IOPC investigation

IOPC independent investigations	3	3		No change
<p><u>Accelerated misconduct meetings held Q3</u></p> <p>None held</p> <p><u>Misconduct meetings / hearings held Q3</u></p> <p><u>Misconduct Hearing – None held.</u> <u>Stage 3 Proceedings - None held.</u> <u>Misconduct meeting – None held.</u></p>				

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 Q3 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. Of the 85 allegations recorded during Q3 2025/26 the highest number were in the categories of: Police action following contact (18) General level of service (8) Information (7) Use of Force (6) Handling/damage to Property (5) Impolite language and Tone (5).
24. 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.

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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**)

Glossary

Terminology