

City of London Police – Complaints 2023/24

Introduction

This annual report presents an analysis of complaints and allegations made against the City of London Police and its national Action Fraud reporting service for the year 2023/24. It is mandated that local policing bodies publish the most recent quarterly complaint data from the Independent Office for Police Conduct (IOPC) for the force, accompanied by a statistical report. This report also includes a narrative outlining how accountability is maintained for the chief officer, alongside an assessment of its own performance in carrying out its complaints handling functions.

Definitions of terms related to police complaints can be found in Annex A of this report.

2023/24 complaints data – At a glance

The City of London Police received **541 complaints** in 2023/24, of which **161** were about the local force and **380** were about the Action Fraud Service* These complaints contained a total of **651** allegations.

The average time to log a complaint was **6 days** and the average time taken to contact a complainant was **28 days**. On average it took **97** days to finalise cases falling outside of Schedule 3*** and **199** days to finalise Schedule 3 cases (ex-suspension).

The commonest complaint allegation types – accounting for 447 (69%) were about deliveries of duties and service. The majority of which relate to Action Fraud.

Of the 4 cases reviewed by the local policing body 2 were upheld (meaning that the policing body concluded the complaint had not been handled appropriately) and recommended that additional measures were taken to remedy the dissatisfaction expressed by complainants.

**The City of London Police operates the national Action Fraud reporting service*

***Each complaint may contain one or more allegations*

****Some complaints can be resolved by early intervention. If this does not occur, it must be recorded and investigated in line with IOPC guidance which is known as a 'Schedule 3' complaint.*

What complaints were about

A complaint may consist of one or more allegations, with each allegation categorised into one of 11 distinct categories, and assigned a subcategory where applicable. The primary objective of these categories is to identify and capture the underlying cause of the dissatisfaction expressed.

Chart 1 illustrates the total volume of complaints, allegations and the number of complainants for 2023/24, highlighting the split between the local City of London Police services and the national Action Fraud reporting service.

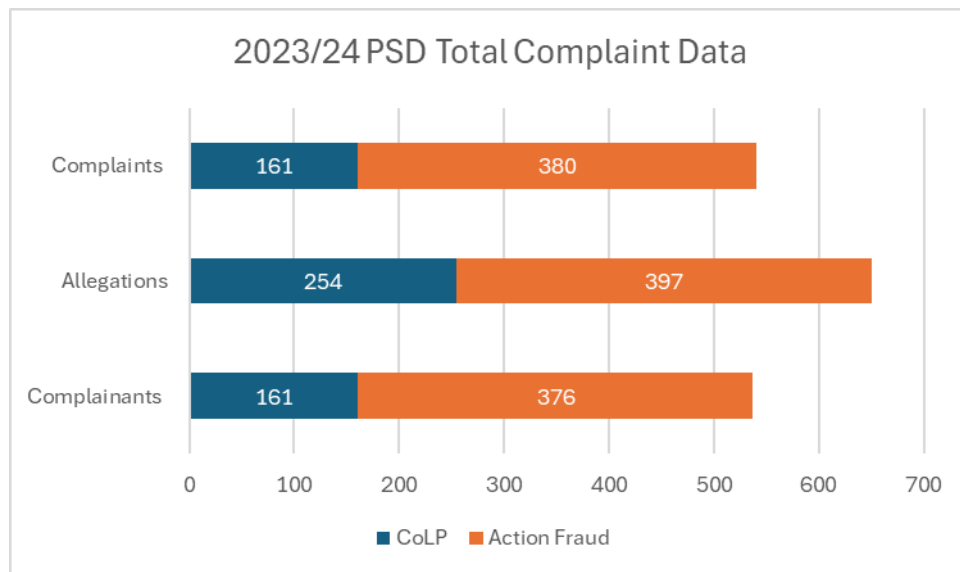


Chart 2 – Breakdown of Scheule 3 and non-Schedule 2 complaints (exc. Action Fraud)

Presents the number of complaints logged against the local City of London Police service that were categorised under ‘Schedule 3’ for each quarter of 2023/24. Schedule 3 related to complaints that are recorded and investigated in accordance with the statutory guidance set by the Independent Office for Police Conduct (IOPC). It is important to note that some complaints may not warrant a comprehensive Schedule 3 enquiry; for instance, if an individual seeks clarification on an issue or wished to raise a concern. In such cases, these complaints are categorised as outside the scope of Schedule 3.

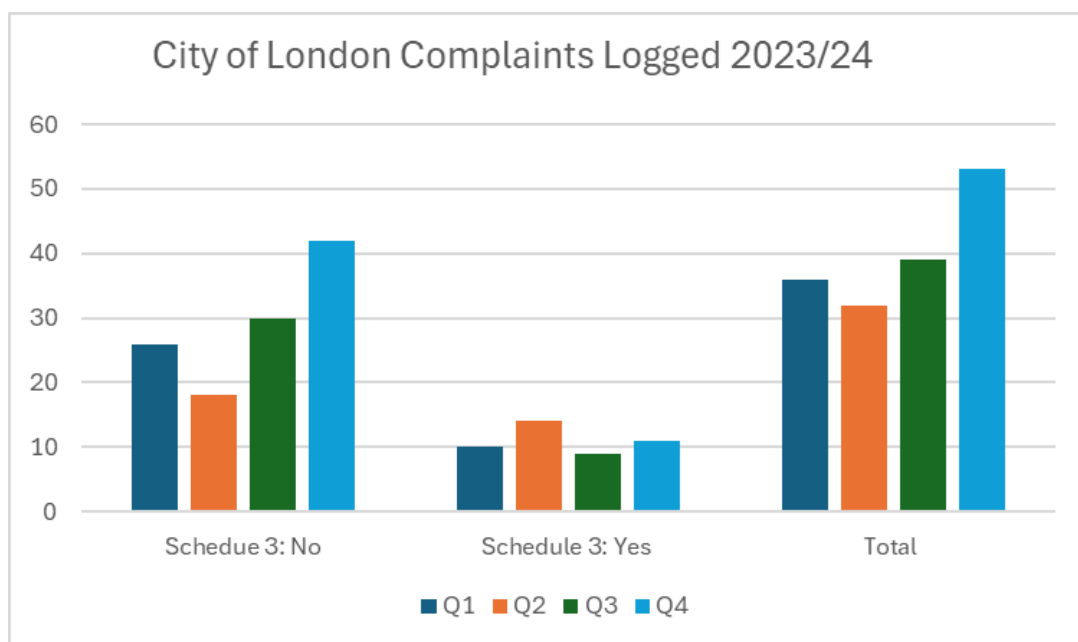


Chart 3 – Reasons for recording complaints under Schedule 3 (inc. Action Fraud)

This presents a year on year comparison of the different reasons complaints were formally recorded under Schedule 3, including decisions made by the handling body.

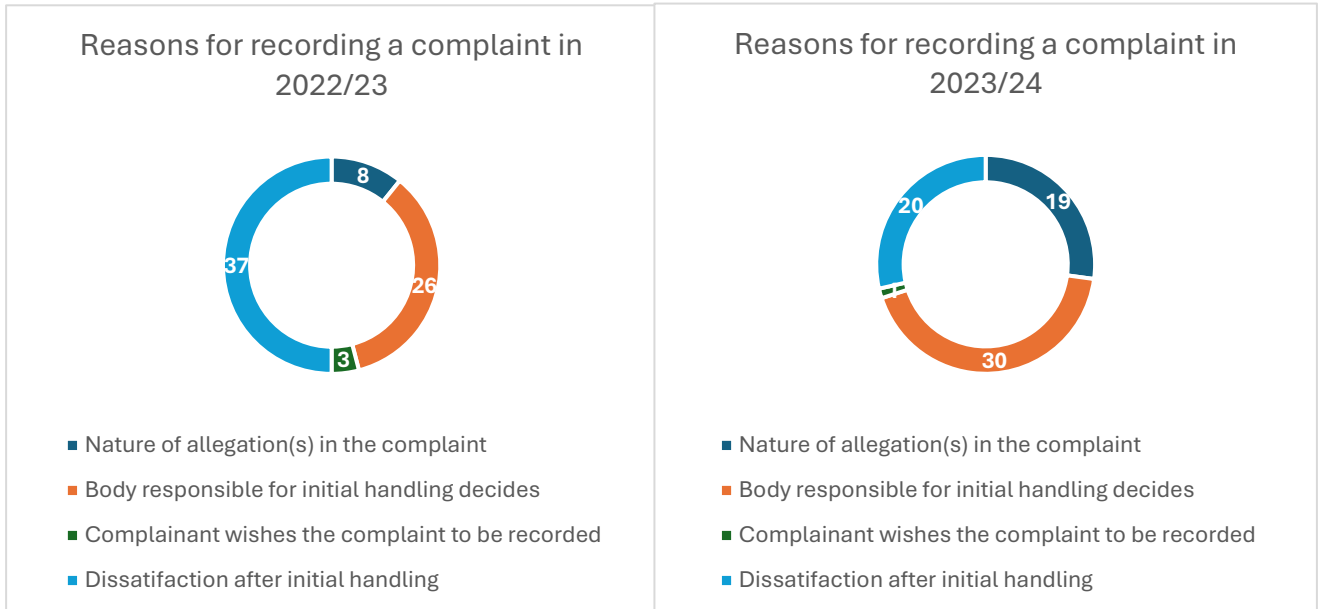
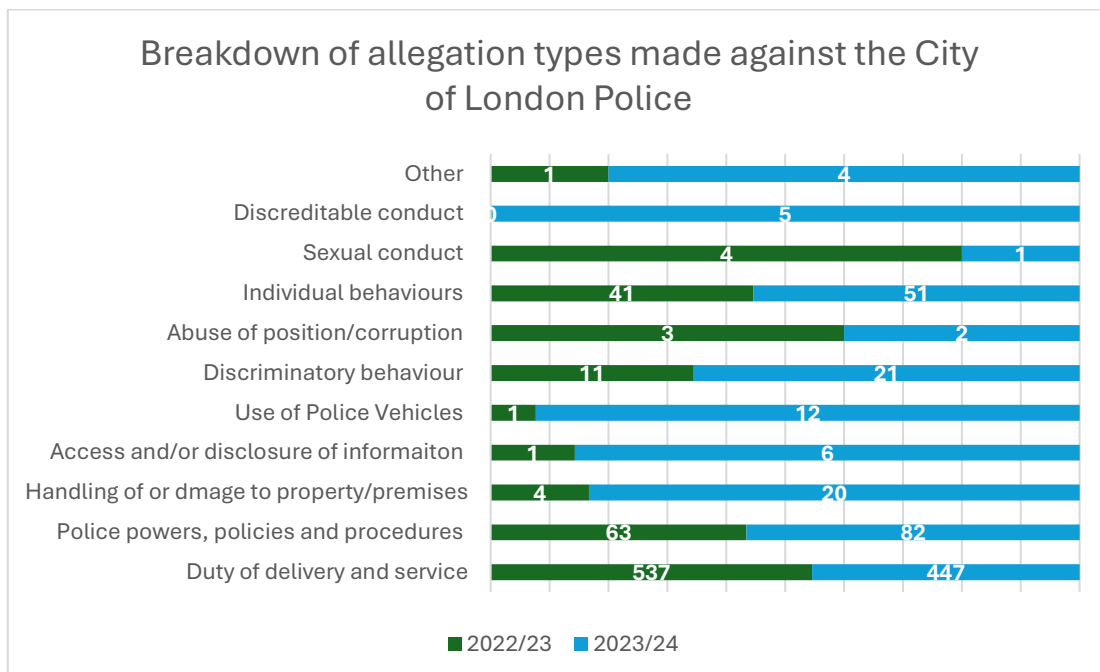


Chart 4 – A comparison of the breakdown of allegation types reported against the City of London Police (including Action Fraud) for the years 2022/23 and 2023/24.



A comparison of police complaints data from 2022/23 and 2023/24 reveals a slight overall reduction in the number of allegations recorded from 666 to 651. While complaints related to service delivery remain the most common, they decreased notably from 537 to 447. In contrast, complaints concerning police discriminatory behaviour and individuals conduct all increased suggesting a shift in concerns.

The number of complaints recorded under Schedule 3 due to the nature of allegations or dissatisfied initial handling also rose, indicating a growing need for formal resolution pathways. Additionally, Action Fraud continued to account for a significant proportion of complaints, with a marked spike in Q4, highlighting potential issues in service delivery or public engagement during across the period.

Overall, the data suggests that while the volume of complaints has stabilised, the complexity and seriousness of issues raised are increasing.

Sub section on Action Fraud Complaints

Chart 5 – Quarterly breakdown of complaints logged, and allegations recorded

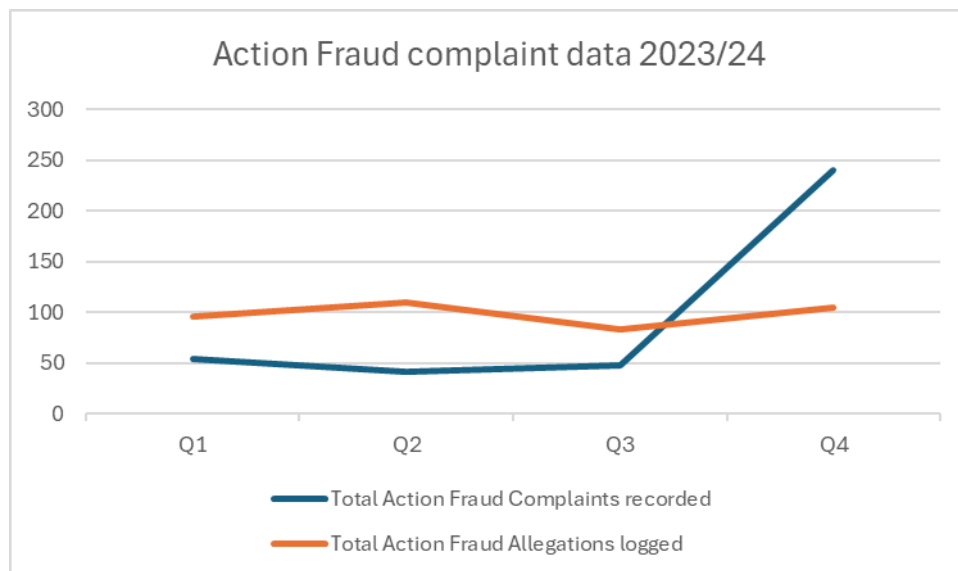
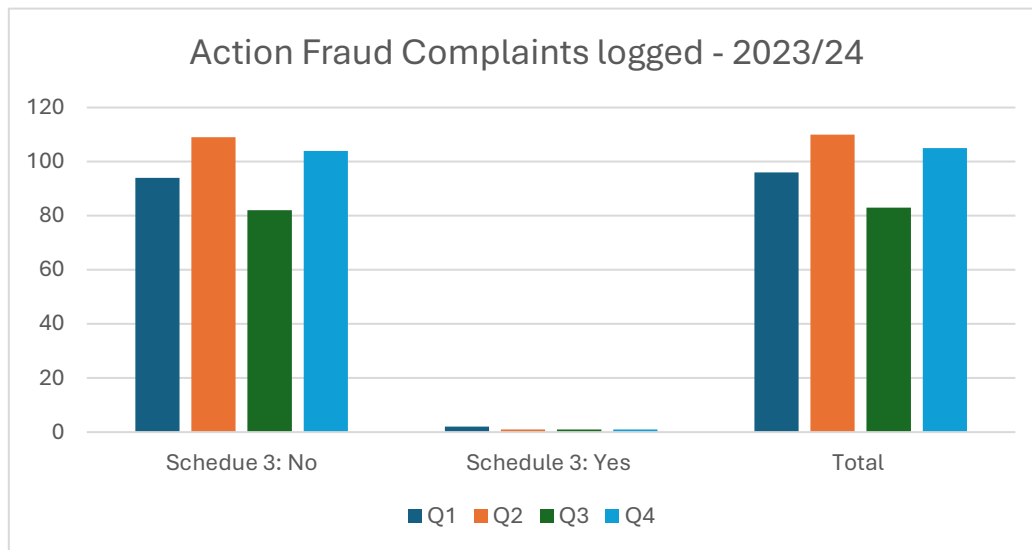


Chart 6 – Presents the breakdown of Schedule 3 and Non-Schedule 3 complaints related to Action Fraud. Schedule 3 related to complaints that are recorded and investigated in accordance with the statutory guidance provided by the Independent Office for Police Conduct. Certain complaints may not undergo a detailed Schedule 3 enquiry, such as when an individual seeks clarification on an issue or wishes to express a concern. In these instances, the complaint is classified as ‘Outside Schedule 3’.

Chart 6 – Breakdown of Schedule 3 and non-Schedule 3 complaints – Action Fraud (2023/24)

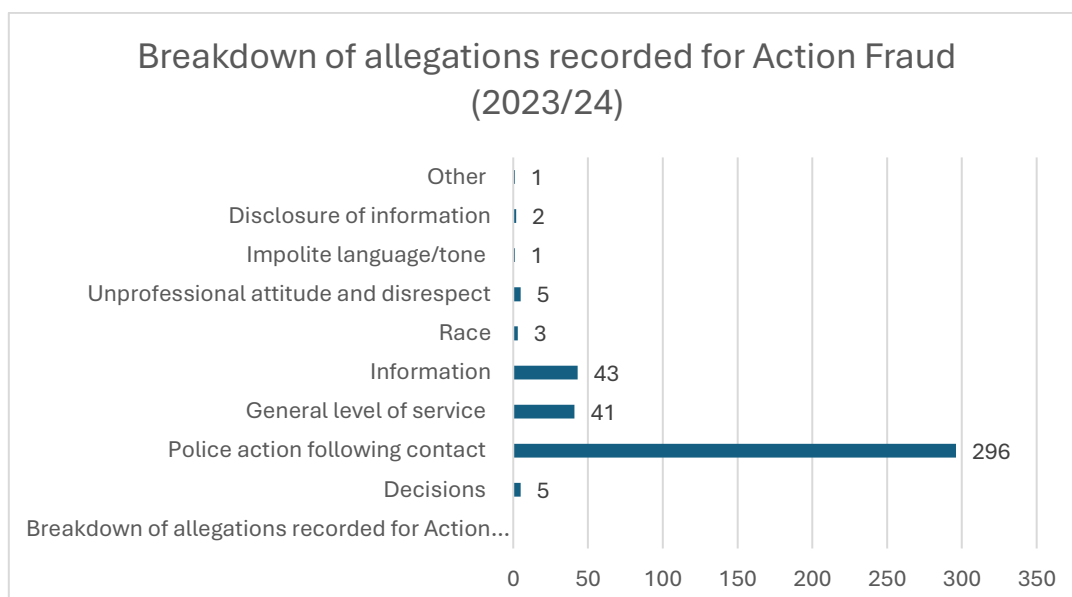


This chart highlights that the majority of Action Fraud complaints are recorded outside Schedule 3.

It is important to note that although most allegations pertain to a perceived level of failure to investigate cases submitted to Action Fraud (as indicated in the 'decisions' category below), Action Fraud operates solely as a reporting service and does not bear investigative responsibilities. Cases submitted to Action Fraud are initially assessed by the National Fraud Intelligence Bureau, and when deemed appropriate, are forwarded to local police forces for potential investigation.

The City of London Police now routinely provided complainants with information about relevant patterns and stakeholders who may be better equipped to address their concerns and assist in the recovery of lost funds.

Chart 7 – Breakdown of allegations recorded for Action Fraud (2023/24)



The City of London Police is the National Lead Force for Fraud. Since April 2013, it has been responsible for receiving all fraud reports across England and Wales through the 'Action Fraud' reporting process. Reports submitted to Action Fraud are forwarded to the National Fraud Intelligence Bureau (NFIB) for assessment and potential dissemination to local law enforcement agencies for investigation consideration.

Since September 2020, the Professional Standards and Integrity Committee of the City of London Police Authority has received separate reports on Action Fraud and City Police complaints data, enabling a more focused approach to scrutinising these separate areas of complaints.

The majority of complaints related to Action Fraud pertain to a perceived lack of investigation into reported incidents. However, it is important to clarify that Action Fraud does not hold investigative responsibilities and consequently, such complaints fall outside the remit of the police complaints system.

While the police complaints system does not permit complainants to challenge or overturn previous decisions regarding the investigation of reported fraud, the Professional Standards Directorate has continued to provide detailed and tailored prevention advice to individuals raising such concerns, which ensures that individuals receive information about the most appropriate partner agencies, which are better positioned to address their concerns and support the recovery of lost funds. This has proven effective in aligning complainant's expectations with the scope of services provided by Action Fraud.

It is expected that the forthcoming implementation of the New Action Fraud Replacement Service will assist with the generation of greater insights into fraudulent activity, which will enable rapid dissemination of information, thereby mitigating the impact of fraud on victims at scale.

How is the City of London Police Commissioner held to account?

The Professional Standards and Integrity (PSI) Committee of the City of London Police Authority Board has responsibility for providing detailed oversight of professional standards in the City of London Police, including scrutiny of the City Police's handling of complaints and conduct matters. It is chaired by an external member of the City of London Police Authority Board. Members of this Committee also meet to determine complaints reviews received by the Police Authority (see below).

Further details on the overall work of this Committee can be found here: <https://democracy.cityoflondon.gov.uk/mgCommitteeDetails.aspx?ID=398>.

The outcomes of the Professional Standards and Integrity Committee's quarterly meetings are reported to the City of London Police Authority Board, which holds overarching responsibility for holding the Commissioner of the City of London Police to account and ensuring the delivery of an effective and efficient police service.

During the 2023/24 reporting period, the Professional Standards Committee received regular statistical updates on complaint cases, including trends in the nature of allegations and the methods by which these were resolved. The Committee continued to undertake detailed scrutiny of complaint casework logged by the City Police.

In collaboration with the Director of the Professional Standards Directorate (PSD), the PSI Committee has worked to ensure that the papers reviewed by Committee included sufficient detail to assess the appropriateness of outcomes, while safeguarding personal information and avoiding unnecessary administrative burden. In 2023/24, the Committee also maintained oversight of conduct matters, receiving updates on all misconduct meetings and hearings conducted by the City Police.

The PSI Committee continued to support the City Police in identifying and embedding organisational learning from complaints and conduct cases.

Learning remains central to the work of PSD. Complainants frequently seek recognition of shortcoming in the handling of their cases and often express a desire for the officer or organisation to acknowledge these failings and demonstrate how similar issues will be prevented in the future. Reflective Practice has been embedded as a key component of the organisational learning culture, in alignment with the principles encouraged by the Police Regulations.

The Organisational Learning Forum (OLF) continues to play a vital role in embedding learning across the City of London Police. It is supported by several tactical working groups focused on key operational areas, including custody, public order, stop and search and professional standards, and promotes application of learning at a local level.

The Professional Standards Directorate Working Group (PSDWG) is attended by a compliance officer from the City of London Corporation's Police Authority Team, representing the PSI Committee. In 2023/24 this representative participated in PSDWG meetings, attended refresher workshops facilitated by the Independent Office for Police Conduct (IOPC), as well as by legal professionals specialising in police complaints and misconduct.

The Police Authority Board's assessment of its own performance in carrying out the complaint handling function

Since February 2020, local policing bodies have held responsibility for determining reviews of police complaints where a complainant believes their case was not handled reasonably or proportionately.

In the City of London, this responsibility is delegated to the Professional Standards and Integrity Committee of the Police Authority Board.

Review panels, comprising three members of the Committee, are convened in accordance with the established governance within the Corporation's governance framework. These panels operate independently to assess whether complaints were

managed appropriately and to identify any emerging themes of organisational learning.

The review process is supported by the Compliance Lead within the Police Authority Team, who oversees the end-to-end administration of each case. This includes acknowledging and assessing review requests, managing documentation and preparing recommendations reports for the panel's consideration.

All review applications are assessed against the criteria set out in the Independent Office for Police Conduct (IOPC) statutory guidance.

Reviews considered in 2023/24

During 2023/24, the complaints review panel convened on four occasions to consider four individual cases. The breakdown of these cases is as follows:

Outcomes of review by the Local Policing Body:	Upheld	Not Upheld
Reviews completed	2	2
Subject matter of cases		
Police Powers, policies and procedures		

In accordance with IOPC statutory guidance, there is no mandated timescales for completing complaint reviews. However, the City of London Police Authority remains committed to progressing reviews as efficiently as possible. Delays may occur due to case complexity or the need for further enquiries with the force, the IOPC or the complainant – such as reviewing police statements or Body Worn Video footage.

In 2023/24, review requests were acknowledged within 30 days of receipt. The average duration for these determinations was 194 days, slightly down from 200 in 2022/23.

Three recurring themes emerged from the reviews considered funding the year:

i) Perceived Inadequacy in Service Delivery

Complainants expressed dissatisfaction with the initial handling of their complaints, delays and insufficient assessment of the facts. These concerns suggest a need for improved early engagement and more thorough scoping of dissatisfaction at the outset.

ii) Impact of Police Actions on Complainants

Reviews highlighted the emotional and financial toll of complaints involving police powers, such as stop and search or arrest. Complainants often described the process as resource-intensive and lacking in empathy.

iii) Desire for Organisational Learning and Acknowledgement

Complainants sought reassurance that their experiences would lead to meaningful learning. A common concern was the perceived lack of acknowledgement from the force regarding the circumstances arising from dissatisfaction expressed and how similar issues would be prevented in future.

These themes have been shared with the Professional Standards Directorate and Working Group. In response, efforts have been made to embed learning through reflective practice and continuous professional development, enabling officers and supervisors to better understand and address complainant concerns.

The Police Authority has also continued to clarify its role in the complaints system, focussed on assessing whether complaints were handled reasonable and proportionately. Where appropriate, complainants have been signposted to external agencies such as the Citizens Advice Bureau or the Financial Conduct Authority for further support. No judicial review applications were submitted in 2023/24.

Conclusion

The 2023/24 police complaints data for the City of London Police, including Action fraud highlights both progress and opportunities for improvement in the year ahead.

While improvements have been made in areas such as the timeliness of complaint logging, reducing from 21 days in 2022/23 to 6 days in 2023/24, the data also highlights ongoing concerns around service delivery, responsiveness and consistency of complaints handling.

Action Fraud continues to account for a disproportionately high volume of complaints and allegations, reflecting ongoing public dissatisfaction with its service delivery, which presents opportunities for targeted improvement in communication, particularly in clarifying the scope and limitation of the police complaints system.

The consistent number of complaints recorded under Schedule 3 suggests that a significant proportion of cases meet the threshold for formal handling, often due to the dissatisfaction with initial responses or the nature of the allegations. This reinforces the importance of robust early resolution mechanisms and transparent triage processes.

The data shows that the most frequently cited issues related to service delivery, police powers and individual conduct. These patterns suggest that public concerns are not limited to outcomes but also encompass the quality of interactions and procedural fairness, which are issues that align with broader national concerns about trust in policing.

More broadly, comparative data shows mixed performance against national averages, While CoLP has improved the average time taken to log complaints (from 21 days in 2022/23 to 6 days in 2023/24), it continues to sit slightly behind national

benchmarks in areas such as contacting complainants and finalising complaints outside schedule 3.

These findings collectively highlight the need for continued investment in complaint handling processes, with a sustained focus on learning and accountability. Insights on complaints should be systematically translated into training, policy development and frontline practice to prevent recurrence and support cultural change.

Based on the findings, key focus areas for the year ahead should include reducing the time taken to contact complaints and finalising cases for the force, particularly those handled outside of Schedule 3, to ensure that informal resolutions are fair and consistent, and strengthening internal oversight through improved guidance and quality assurance. This should occur alongside reviews conducted by the Police Authority, so they align more closely with national benchmarks. Addressing these priorities will be essential to enhancing public confidence and ensuring that both the City of London Police and the Police Authority delivery a fair, transparent and responsive complaints system.

Appendices

- Appendix 1 – Glossary of Terms
- Appendix 2 – City of London Police Complaints data 2023/24

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Annex A: glossary of terms

Allegation: An allegation may concern the conduct of a person or persons serving with the police or the direction and control of a Police force. It is made by someone defined as a complainant under the Police Reform Act 2002 (see 'complainant' below). An allegation may be made by one or more complainants.

A complaint case may contain one or many allegations. For example, a person may allege that they were pushed by an officer and that the officer was rude to them. This would be recorded as two separate allegations forming one complaint case. An allegation is recorded against an allegation category.

Chief officer: 'Chief officer' is a collective term that refers to the heads of police forces (chief constables for all forces except the Metropolitan Police and City of London Police, which are each headed by a commissioner).

Complainants: Under the Police Reform Act 2002, a complaint may be made by:

- a member of the public was adversely affected by the matter complained about, or is acting on behalf of someone who was adversely affected by the matter complained about
- a member of the public who claims to be the person in relation to whom the conduct took place
- claims to have been adversely affected by the conduct
- claims to have witnessed the conduct, or
- is acting on behalf of someone

who satisfies one of the above three criteria

- a member of the public can be said to be a witness to the conduct if, and only if: they have acquired their knowledge of the conduct in a manner which would make them a competent witness capable of giving admissible evidence of that conduct in criminal proceedings, or
- they possess or have in their control anything that could be used as admissible evidence in such proceedings
- a person acting on behalf of someone who falls within any of the three categories above. This person would be classed as an 'agent' or 'representative' and must have the written permission of the complainant to act on their behalf.

A person is 'adversely affected' if they suffer distress or inconvenience, loss or damage, or are put in danger or at risk by the conduct complained of. This might apply, for example, to other people present at the incident, or to the parent of a child or young person, or a friend of the person directly affected. It does not include someone distressed by watching an incident on television.

One complaint case can have multiple complainants attached to it and one individual can make more than one complaint within the reporting year.

Subjects: Under the Police Reform Act 2002 (PRA 2002), complaints can be made about persons serving with the police as follows:

- Police officers of any rank
- Police staff, including community support

officers and traffic wardens

- Special Constables

Complaints can also be made about contracted staff who are designated under section 39 of the PRA 2002 as a detention officer or escort officer by a chief officer.

Complaint recording

Complaint case: A single complaint case may have one or more allegations attached to it, made by one or more complainants, against one or more persons serving with the police.

Changes to the Police Complaint & Conduct regulations in 2020 placed a greater emphasis on handling complaints in a *reasonable and proportionate* way and in a more customer focused manner.

Reports of dissatisfaction are logged and assessed in line with Schedule 3 of the Police Reform Act 2002 and IOPC Statutory Guidance 2020 and this assessment can result in one of a number of outcomes;

Non-Schedule 3 or early service recovery. PSD will make early contact with the complainant to understand their concerns and their dissatisfaction and, where the nature of their dissatisfaction allows, will try to resolve it to their satisfaction. This avoids a more lengthy process of investigation and can provide a complainant with an early resolution, explanation or other satisfactory outcome. If at the end of this process, it cannot be resolved it may be dealt with as a formal complaint within Schedule 3.

Schedule 3 Recorded – IOPC Statutory Guidance stipulates where

complaints must be recorded and those that must be investigated; these include the more serious matters. Complaints which do not require an investigation will be handled in a *reasonable and proportionate* manner to try to achieve an earlier resolution to the complainant's satisfaction, while others will be investigated formally. At the end of this process if the complainant remains dissatisfied with the outcome of the complaint they have a right of review by either the Local Policing Body or the IOPC, depending on the seriousness of the allegation.

Referral to Independent Office for Police Conduct – some complaints may be referred to the IOPC and they may decide to independently investigate or oversee a police investigation. The IOPC also monitor our complaints system.

Investigations:

- Local investigations: Are carried out entirely by the police. Complainants have a right of appeal to the relevant appeal body following a local investigation.
- Supervised investigations: Are carried out by the police under their own direction and control. The IOPC sets out what the investigation should look at (which is referred to as the investigation's 'terms of reference') and will receive the investigation report when it is complete. Complainants have a right of appeal to the IOPC following a supervised investigation.

Investigation outcomes:

Where a complaint has been investigated but the investigation has not been subject to special

procedures, or a complaint has been handled otherwise than by investigation, the outcome of the complaint should include a determination of whether:

- the service provided by the police was acceptable
- the service provided by the police was not acceptable, or
- we have looked into the complaint, but have not been able to determine if the service provided was acceptable

Reflective Practice Review Process:

Practice Requiring Improvement (PRI) is an appropriate outcome within Police Regulations for low level matters of complaint or conduct following a PSD investigation. The Reflective Practice Review Process (RPRP) is the process undertaken by officers to reflect upon their involvement and review the practice that requires improvement. Where a matter is raised or identified internally and does not reach the threshold for PSD investigation or disciplinary action, it should be handled locally by line managers and supervisors under RPRP. The process should be a clear focus on reflection, learning from mistakes and focusing on actions / development to improve and, where necessary, put the issue right and prevent it from happening again. RPRP should be used for low-level intervention and performance issues that do not warrant a written warning or above or Unsatisfactory Performance Procedures (UPP).

Gross Misconduct: A breach of the Standards of Professional Behaviour so serious that dismissal would be justified.

Misconduct: A breach of the Standards of Professional Behaviour

Misconduct Hearing: A type of formal misconduct proceeding for

cases where there is a case to answer in respect of gross misconduct or where the police officer has a live final written warning and there is a case to answer in the case of a further act of misconduct. The maximum outcome at a Misconduct Hearing would be dismissal from the Police Service.

Misconduct Meeting: A type of formal misconduct proceeding for cases where there is a case to answer in respect of misconduct, and where the maximum outcome would be a final written warning.

Sub judice: After recording a complaint, the investigation or other procedure for dealing with the complaint may be suspended because the matter is considered to be sub judice. This is when continuing the investigation / other procedure would prejudice a criminal investigation or criminal Proceedings.

There are a number of factors Police forces should consider when deciding whether a suspension is appropriate. The complainant must be notified in writing when the investigation / other procedure into their complaint is suspended and provided with an explanation for the decision. A complainant has the right to ask the IOPC to review that decision.

Withdrawn: A complainant may decide to withdraw one or more allegations in their complaint or that they wish no further action to be taken in relation to their allegation/complaint. In this case, no further action may be taken with regard to the allegation/complaint.

Police Terminology

AA: Appropriate Authority

ANPR: Automatic Number Plate Recognition

ATOC: (Association of Train Operating Companies) agreements.

To be authorised to travel within the ATOC agreement warranted officers must sign to join the scheme and an agreed amount is taken from their wages at source. When they begin working at CoLP officers are provided with a warrant card which previously permitted travel on the over ground trains within a specific region in the south east of the UK. As long as the warrant card did not have the words 'Not for Travel' across it officers were considered to be in the ATOC agreement. This has since changed and officers now receive a Rail Travel card to be shown alongside their warrant card to confirm they are in the agreement.

Other forces have similar schemes including Essex Police who issues their officers in the agreement with a travel card. This has to be shown with a warrant card. With both CoLP and Essex Police when officers leave the force they are required to hand back both their warrant and travel cards. If they are transferring forces and required to travel by train the expectation would be that they would buy a train ticket on their first day before their new warrant card and now travel card are issued.

BWV : Body Worn Video

CAD: Computer Aided Dispatch

CCJ: County Court Judgement

DPS: Directorate Professional Standards (Metropolitan Police Service)

DSI: Death or Serious Injury

ECD: Economic Crime Directorate

FI: Financial Investigator

HCP: Health Care Professionals

IOPC: Independent Office of Police Conduct

LP: Local Policing

MIT: Major Investigation Team

MPS: Metropolitan Police Service

NFA: No Further Action

NLF: National Lead Force

NUT: National Union of Teachers

PCO: Public Carriage Office

PHV: Private Hire Vehicle

PMS: Property Management System

PNC: Police National Computer

POCA: Proceeds of Crime Act

PRI: Practice Requiring Improvement

P&T: Professionalism and Trust

SAR: Subject Access Request

SAR: Suspicious Activity Report

SIO: Senior Investigating Officer

SOP: Standard Operating Procedure

SO: Specialist Operations

STOT: Safer Transport Operations Team

TFG: Tactical Firearms Group

TfL: Transport for London

TPH: Taxi and Private Hire

Table 1 provides an overview of the IOPC data regarding complaints and allegations against the city of Londo Police for the year 2023/24. The data is presented in conjunction with national averages. However, it is important to note that the City of London IOPC data includes complaints and allegations related to the Action Fraud reporting service. As a result, the volumes and response times may not be directly comparable. For additional details, please refer to the Section on Action Fraud complaints below.

Table 1 – City of London Complaints data 2023/24		
Metric	CoLP Data*	National Average
Number of complaints logged (including Action Fraud)	541	85,458
Number of complaints logged per 1,000 employees	348	338
Number of allegations logged (including Action Fraud)	651	
Number of allegations logged per 1,000 employees	419	599
Average time taken to log complaint	6 days	5 days
Average time taken to contact complainant	28 days	6 days
Number of allegations finalised – outside Schedule 3	355	60,166
Number of allegations finalised – inside schedule 3	62	18,860
Average time taken to finalise complaint outside Schedule 3	97	20
Average time taken to finalise complaint – inside Schedule 3 (not inc suspension)	199	133
Applications for review received by the IOPC – investigated	3	890
Applications for review received by IOPC – not investigated	2	1,246
Number of allegations finalised by investigation under Schedule 3 – investigated (not subject to special procedures)	53	16,901
Number of allegations finalised by investigation under Section 3 – investigated (subject to special procedures)	9	1,959
Average time taken to finalise allegations – outside Schedule 3	87	18
Average time taken to finalise allegations – not investigated under Schedule 3	158	106
Average time taken to finalise allegations – by local investigation under Schedule 3	175	191
<i>*Note that figures for the City of London include complaints and allegations about Action Fraud. This means they are not directly comparable to other forces data.</i>		

