

MOPAC MPS Oversight Board

25th June 2021

Public complaints and conduct

Report by: Detective Chief Superintendent Donna Smith

1. Purpose of this Paper

- 1.1 The purpose of this paper is to provide an overview of key issues relating to public complaints and misconduct in the MPS. The paper analyses themes in public complaints and misconduct investigations, and highlights the areas of misuse of social media and racial discrimination as of especial concern. The action being taken is discussed.
- 1.2 The paper then reviews the efficiency and effectiveness of the complaints and misconduct investigations process. Having set out detail of the outcomes of formal misconduct proceedings over the last five years, the paper discusses the extensive activity underway to prevent and learn from complaint and conduct cases, including engagement with the Mayor's Office for Policing and Crime (MOPAC), the Independent Office for Police Conduct (IOPC) and the London Policing Ethics Panel.

2. Recommendations

- 2.1 The Oversight Board is invited to note the work being done to improve the MPS's response to public complaints and allegations of misconduct and to prevent such cases arising.

3. Information for Consideration:- Public Complaints and conduct:

- 3.1 The following information in relation to public complaints and conduct is provided in order to assist the Deputy Mayor for Policing and Crime

(DMPC) in discharging the statutory role of oversight of the MPS police complaints management.

- themes
- efficiency / effectiveness (including quality and timeliness)
- performance
- outcomes
- learning

4. Public complaint themes (e.g. what do people complain about / interactions that give rise to complaints)

- 4.1 Table 1 shows that over the last 12 months the MPS has received 24% more complaints than in the previous year. Allegations have also increased by 20% over the last 12 months.
- 4.2 When discussing complaints data, it should be noted that ‘cases’ refer to the number of complaints recorded and ‘allegations’ relate to the breakdown of each individual complaint. For example, a complainant may make one complaint about an encounter they have had with a police officer which contains two or more allegations (eg. they may complain that the officer was rude to them, used force that was excessive and that they believe they were treated that way due to their race. This would be recorded as one case with three allegations - incivility, excessive force and discrimination).

	2019/20	2020/21	Difference	% Change
Cases	6,474	7,999	+1,525	+24%
Allegations	12,592	15,166	+2,574	+20%

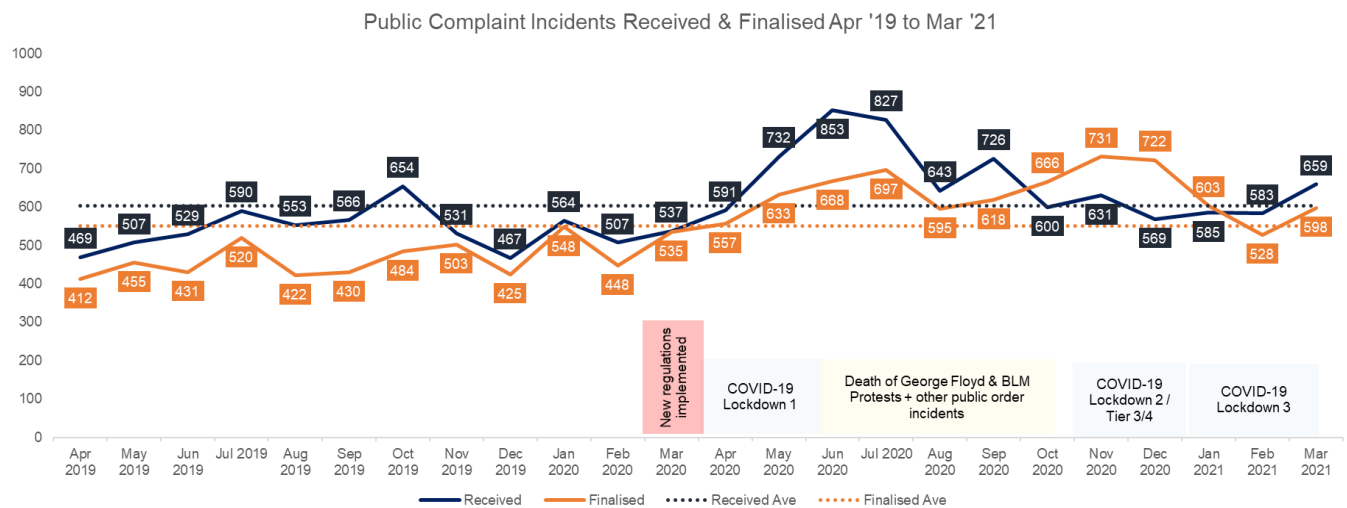
- 4.3 The IOPC publish police complaints statistics for England and Wales annually. However, the 2020/21 data has not yet been published so we are currently unable to gauge how this increase compares with other forces over the same time period. In relation to 2019/20 data, as

¹ A complaint is any expression of dissatisfaction with a police force that is expressed by or on behalf of a member of the public¹⁶. It must be made by a person who meets the definition of a complainant. There must also be some intention from the complainant to bring their dissatisfaction to the attention of the force or local policing body. A complaint does not have to be made in writing, nor must it explicitly state that it is a complaint for it to be considered as one. (Section 12 Police Reform Act 2002)

complaints were no longer recorded under the 2012 regime from 1 February 2020, the count for this dataset is not a total year count (it only represents 10 months of data) and cannot therefore be compared to 2018/19 or 2020/21 as a percentage annual change.

https://policeconduct.gov.uk/sites/default/files/Documents/statistics/complaints_statistics_2019_20.pdf

4.4 The following graphic demonstrates the numbers of complaints recorded vs the numbers of complaints finalised in the same reporting period. The increases reported in Table 1 are broken down on a monthly basis and key events where complaint numbers saw an increase are also highlighted (eg. COVID, murder of George Floyd, Black Lives Matter (BLM) protests etc).



4.5 Table 2 shows the top 20 complaint allegation types recorded in 2020/21. These are the allegation types set by the IOPC / Home Office under 2020 regulations and therefore it is not possible to do historical comparisons as the new allegation types are much broader than those previously used under the previous regime. The top 20 complaint allegation types account for 89% of all complaint allegations.

General level of service	2814
Police action following contact	2206
Use of force	1200
Decisions	1104
Stops, and stop and search	883
Unprofessional attitude and disrespect	650

Power to arrest and detain	607
Detention in police custody	437
Other	424
Race	420
Handling of or damage to property/premises	390
Searches of premises and seizure of property	387
Information	341
Impolite language/tone	330
Impolite and intolerant actions	302
Other policies and procedures	271
Overbearing or harassing behaviours	238
Lack of fairness and impartiality	198
Evidential procedures	175
Disclosure of information	149
Total	13,526

4.6 The two largest allegation types were “General level of service” and “Police action following contact”. These two types of allegations are the largest by a significant amount and account for 37% of the top 20 allegation types. These two allegation types are defined by the IOPC as follows:

- General level of service - *This relates to the level of service provided where none of the other sub-categories apply.*
- Police action following contact - *This is about the police action following contact, including: -*
 - *No or insufficient action in response to a reported incident.*
 - *The size, nature or quality of an investigation.*
 - *No or insufficient response to a communication or other contact with police*
 - *Timeliness of the response (including an investigation) to a reported incident, communication or other contact.*

4.7 Under the previous regulations, most of these allegations would have been recorded as “failure in duty” allegations, which under the previous regulations was historically the highest allegation type recorded.

4.8 Third and fourth in the top 20 are “use of force” and “decisions” with similar numbers of allegations recorded. These two allegation types are defined by the IOPC as follows:

- Use of force - *This concerns any issue with the use of force, including where equipment is used, and any incident involving police dogs or horses where the allegation is about the handling of the dog/horse. 'Equipment' includes batons, restraint equipment, Tasers and firearms. Examples include use of force when exercising police powers to control a detainee or people in a crowd, or to prevent someone interfering with officers in the execution of their duties. It includes allegations of use of force resulting in any injury and where no injury is sustained, such as pushing. 'Injury' includes both physical and psychiatric injury.*
- Decisions - *This is about operational and organisational decisions, including:*
 - *How matters reported to the police are recorded*
 - *Crime recording decisions*
 - *Decisions made at the conclusion of an investigation*
 - *Force-wide crime initiatives*

4.9 National data for 2020/21 has not yet been published by the IOPC. The 2019/20 data is not a useful comparator due to the change in the way allegation types are reported since the introduction of the new regulations and they do not correlate. The 2019/20 data does show that nationally, the most common allegation type was 'failures in duty' (21,946 allegations nationally), followed by 'incivility' (6321) and 'other assault' (3954).

5. Conduct themes (what are officers being investigated for?)

5.1 Table 3 shows that over the last 12 months the MPS has recorded 12% more conduct cases than in the previous year. Allegations have also increased by 2% over the last 12 months.

Table 3 - Conduct²				
	2019/20	2020/21	Difference	% Change
Cases	808	907	+99	+12%
Allegations	1,305	1,337	+32	+2%

² A conduct matter is any matter which is not and has not been the subject of a complaint, where here is an indication (whether from the circumstances or otherwise) that a person serving with the police may have committed a criminal offence or behaved in a manner which would justify disciplinary proceedings (Section 12, Police Reform Act 2002).

5.2 Table 4 shows the top 20 conduct allegation types recorded in 2020/21. These are the allegation types set by the IOPC / Home Office under 2020 regulations and therefore it is not possible due to historical comparisons as the new allegation types are much broader than those used previously. The top 20 allegation types account for 86% of all conduct allegations.

Table 4 - Top 20 conduct allegation types for 2020/21	
Discreditable conduct	418
Other	134
Other policies and procedures	63
Race	59
Unprofessional attitude and disrespect	59
Use of force	53
Use of police systems	43
Sexual assault	40
General level of service	32
Use of police vehicles	29
Disclosure of information	28
Decisions	27
Impolite language/tone	25
Overbearing or harassing behaviours	24
Police action following contact	24
Evidential procedures	21
Abuse of position for other purpose	21
Other sexual conduct	20
Information	14
Sexual Orientation	12
Total	1146

The largest allegation type is “discreditable conduct” by a significant amount. This allegation type is defined by the IOPC as follows:

- Discreditable conduct - *This covers behaviours that occur while not in the execution of a police employee’s duty, but that speak to their conduct as a person serving with the police. This can include issues such as criminal offences committed by police employees or the arrest of a police employee. It can also include activity while on duty that is not in execution of their duty, such as theft where this is not an abuse of position.*

5.3 The MPS have recently undertaken a review of all conduct allegations data to ensure accuracy of recording. Analysis has identified that there are a number of allegations recorded as ‘discreditable conduct’ which may

also fit into a more specific allegation type. This may account for the high number of allegations in this category. For example, an officer arrested for an alleged rape off duty that is not connected to their duties may have previously been recorded as ‘discreditable conduct’ instead of ‘sexual assault’ or ‘other sexual conduct’. As a result, to ensure accuracy of data recording going forwards, new guidance has been circulated to all initial complaint handlers detailing the minimum standards for data recording. All live investigations have been reviewed to ensure data compliance. Directorate of Professional Standards (DPS) dip sampling and audit will also include data compliance as an area to review. This is critical work to ensure that the MPS can fully understand the volume of certain offence types and report on it accurately to DMPC and the public.

6. Thematic areas of concern

6.1 Social Media

Table 5: Social media related investigations recorded on Centurion

Allegation Type	Complaints 2020/21	% Change previous 12 months	Conduct 2020/21	% Change previous 12 month
Social Media	27	+238%	61	+307%

6.2 The inappropriate use of WhatsApp by MPS employees, is of considerable concern and this application, along with other similar apps, continues to be used by officers and staff to share inappropriate material and messages, despite a campaign of activity by DPS and the wider MPS to provide guidance to staff.

6.3 In addition, it is now commonplace for employees to be using online dating websites or networking sites, including those where the occupation is disclosed. This, with underlying behavioural issues, offers a gateway that can impact upon the integrity of the MPS employee and escalate into corrupt practices.

6.4 A growth in intelligence and investigations has been noted by the MPS and other law enforcement agencies surrounding disclosures of information, forming of inappropriate associations, improper social media postings, lack of security awareness and targeting and exploitation by

criminals, media and former colleagues via social media. Targeted anti-corruption measures and educational interventions are pivotal in countering this growing risk area.

6.5 Action taken

- In January 2020, the MPS released its first set of Social Media Principles. These ten principles were developed based on misconduct trends and following extensive consultation. The simple two-page document provides employees with a framework which can guide their use of social media platforms and communication services. This piece of work has been recognised nationally within the national counter-corruption working group and has been disseminated to other forces. (The Principles are attached at **Appendix A**)
- Social media is also included in the MPS counter corruption strategy which sets the MPS's operational priorities identified under the mnemonic STUDIOS; **S**exual Misconduct, including abuse of position for a sexual purpose, **T**heft and fraud, **U**nauthorised access to police information, **D**rug and substance misuse, **I**nappropriate associations, **O**rganised crime and **S**ocial media.
- Key messages are shared via the intranet and information cascaded via the pan-London Professional Standards Unit (PSU) network, signposting the Principles.
- The IOPC have made a number of national recommendations and some MPS specific ones on the use of WhatsApp as a platform. These are being addressed through the WhatsApp Working Group chaired by the Detective Chief Superintendent for DPS. A formal response will be sent in due course but some of the recommendations may not be achievable such as being able to monitor the use of WhatsApp through other technology. The Group has already agreed on improved asset management led by Digital Policing, a review by Strategy and Governance and DPS of our current WhatsApp and wider platform guidance and a review of the personal use policy on phones. In addition the group are tracking the potential availability of MS Teams on mobile devices which would provide an auditable approved platform for work use in the near future. Once guidance has been updated a communications plan will seek to remind staff on appropriate social media use linking into the already released social media principles and some case studies/examples.
- The MPS are also now engaged with a new National Working Group on this topic as it is a national theme. The snapshot of cases highlighted by the IOPC in recent communications from the Director

General to National Police Chiefs Council (NPCC) include numerous forces across England and Wales.

- Prevention and learning training based on the Principles is being provided to new joiners and on promotion courses.
- The MPS are also reinforcing the seriousness of this behaviour through robust assessment, recording and referral of such matters. In addition, there have been a number of recent cases where the MPS and/or IOPC have referred cases to the Crown Prosecution Service (CPS) and Gross Misconduct (GM) hearings, highlighting to officers and staff the serious consequences of this behaviour.
- The Met is ambitious to improve personal and professional standards across a spectrum of policing areas. Engagement across all business groups has sought to identify the key enablers to improve standards, which includes access to timely information and analysis, resources and clear leadership at all levels. In response to the findings from BCU pilots and with the intention of driving a step change in all standards, 12 new Professionalism Chief Inspector positions have been established. Almost all of the new Chief Inspectors have been posted from 14th June 2021 and will:
 - Lead the BCU Professional Standards Unit.
 - Support the BCU Commander to lead and ensure the effective oversight of standards across all aspects of BCU activity.
 - Set local standards, identify risks and issues and ensure a timely and effective response to improving policing standards.
 - Work closely with Digital Policing, Directorate of Professional Standards, Property Services and Locally Delivered Support Services.
 - Raise awareness and education in standards, ensuring any organisational learning is shared and acted on.
 - Oversee and ensure the effective management of equipment/assets, including fleet, technology, uniform and other equipment.
 - Ensure that all buildings within the BCU have designated role holders who understand and fulfil their roles and responsibilities; to include Senior Building Leads, Building Security Officer and Premises Fire Lead.
 - Perform the role of Building Security officers for all buildings within their BCU and complete the required annual Physical Security Reviews.
- The new Professionalism Chief Inspectors will be part of the BCU HQ function; the role has been widely presented as part of the recent Chief

Inspector posting process and within Front Line Policing. The 12 posts will be pressure posts, subject to regular review to identify and share good practice; and inform whether the post should be considered for future investment as part of the officer uplift programme.

- The Chief Inspectors will perform a vital leadership and coordinating role. They will provide additional leadership capacity within a stretched BCU HQ function and work closely with colleagues from Property Services Directorate (PSD), DPS, Digital Policing (DP) and Local Delivery Support Services (LDSS) to ensure activity, processes are coordinated to deliver the necessary improvements in standards.

6.6 Racial Discrimination

- 6.7 In 2020/21 there were 499 public complaints linked to race discrimination, an increase of 33% from the previous year. However, it is also important to note that the total number of allegations increased and that race discrimination allegation numbers remains at 3% of the total number of discrimination allegations. This is an area of increasing concern but one where it is important that members of the public have the confidence to report it.

Table 6: Discrimination allegations and race discrimination allegations:

	2019/20	2020/21
Total Allegations Received	12621	15778
ALL Discrimination Allegations	469	656
Discrimination Allegations as % of Total	4%	4%
Race Discrimination Allegations	342	499
Race Discrimination Allegations as % of Total	3%	3%

- 6.8 The IOPC has launched a thematic review of racial discrimination / bias, bringing these cases under much closer scrutiny, something that the MPS welcome. The Director General’s letter (October 2020) describing this is attached at Appendix B and the most recent communication (May 2021) at Appendix C. The thematic review is intended “to help identify the trends and patterns which should help drive real change in policing practice”. The MPS fully support the thematic and all initial complaint handlers have consideration of it when making referral decisions. (See 6.12 for further activity on this)
- 6.9 On a small number of occasions in the last 6-9 months, the IOPC have increased their severity assessment on related independent investigations, moving them from ‘misconduct only’, to ‘gross misconduct’. The DPS Appropriate Authority Cell (who are the dedicated decision

makers) are looking at these cases closely; they are an area of increasing debate between the MPS and the IOPC.

- 6.10 The MPS recognise the importance and challenges of this thematic review and are working closely with the IOPC to ensure matters are correctly referred, engaging in training sessions with IOPC so that DPS assessment staff are cognisant of what is required for this thematic area. The DPS senior leadership team have an excellent working relationship with their counterparts in the IOPC assessment centre and reviews team (the DPS Detective Superintendent and the IOPC's Head of Assessment speak on a weekly basis) and opportunities to improve are welcomed and implemented when highlighted. The DPS also have a dedicated team, the IOPC Cell, who are responsible for supporting all IOPC independent investigations. The team has a DCI who regularly engages with the IOPC Operational Team Leaders and Decision Makers alongside the Detective Superintendent Head of the Reactive Investigations portfolio.
- 6.11 The DPS are unique in having a dedicated investigative unit who assess and investigate the most serious of discrimination complaints and conduct matters. The Discrimination Investigation Unit (DIU) consists of 1 x Detective Inspector, 3 x Detective Sergeants, 6 x Detective Constables and 7 x Police Constables. The team have received specialist ACAS training and are experienced in investigating discrimination complaints and conduct matters. In addition, they are also responsible for early assessment and fact finding upon receipt of Employment Tribunals (ETs) and matters passed from the Grievance Management Team (GMT). The DIU also conduct Quality Assurance (QA) on all discrimination related complaints investigated by local PSUs and are a point of contact for advice on such related matters for complaint investigators across the MPS. The QA process considers whether local PSU investigation reports cover the following areas:
- IOPC discrimination questions
 - Probing questions
 - Complaint history of officers
 - Patterns of behaviour
 - Comparator evidence
 - Language used

The QA process is currently being reviewed to take into account recent learning and the team are grateful to receive recent training inputs from the IOPC to enhance their knowledge and confidence in handling these matters. The DIU are also currently designing a chapter based discrimination toolkit. This is aimed at enhancing the quality of discrimination complaint investigations and the aim is to launch it in July 2021. It will contain a range of resources for local PSU investigators such

as good work, lessons learnt, case studies, how to use comparator evidence and general advice on how to investigate discrimination complaints. This work will complement the work being done to address the concerns of the IOPC in relation to low upheld complaint outcomes.

6.12 Action Taken

- A Race Thematic Review Working Group has now been set up as a direct result of the IOPC ongoing review and in anticipation of the results (update in the summer of 2021 and a full report at the end of the 21/22 financial year). The DIU are already looking to identify examples of good practice from within the MPS which can be shared with the IOPC as part of their work. The new Working Group are also going to review the outcome levels within the MPS for complaints and conduct issues with regards to race complaints, in light of the national concerns shared by the IOPC. The most up to date annual data from the IOPC will support this when it comes out. The group will include representation from the MPS Crime Prevention, Inclusion and Engagement team (CPIE) and the DPS IAG. One of the critical roles for the Race Thematic Review Working Group will be to implement and embed any appropriate learning that comes from the review. The group will be chaired by the Detective Superintendent for Specialist Investigations and report into the oversight board of the Commander for DPS.
- There is ongoing engagement between the DPS Prevention and Learning team and Learning and Development Directorate to ensure that 'lessons learnt' inform the content of student and leadership training courses to ensure it remains relevant. In particular, on the theme of race discrimination the DPS DIU provide a bespoke input which includes topics such as 'unconscious bias'.
- The DPS Organisational Learning Committee reviews all learning recommendations from the IOPC, inquests and internal investigations to ensure they are properly captured and actioned. As necessary, this is fed into the MPS Organisational Learning Board.
- The DPS is a key part of the creation of the next Inclusion, Diversity and Engagement Strategy and will provide their learning for inclusion in the Strategy.

The DPS is closely linked to the work of the Deputy Commissioner's Delivery Group and is able to provide learning from investigations straight to the Group.

In addition, the MPS have a Use of Force Strategic Oversight Group chaired by DAC Professionalism. The group has brought together policing subject matter experts from areas including officer safety, stop and search, and Taser in addition to, and most importantly, community representatives from across London. The Federation, Superintendents' Association and Metropolitan Black Police Association (MetBPA) also input and have oversight of this work.

A key component of the groups work is the opportunity to review incidents of interest including body worn video recordings, social media activity and statements from various sources. The process is anonymised and confidential, but the views of the group have been used to improve training and to review tactics where appropriate.

Some key areas the group have concentrated on include:

- Policing Encounter Panels (PEPs)
These are being introduced to help build greater trust and confidence of Londoners in the Met. An idea developed through the Use of Force Strategic Oversight Group, they will give local communities the opportunity to review broader aspects of local policing with the aim of improving police practice through shared feedback. PEPs will help the Met build stronger relationships with communities and better understand the impact of policing encounters on Londoners.
- Recording and justifying use of force
Body worn video footage alone is not sufficient to understand justification of actions taken, as it doesn't always reflect the crucial element of the officers' thought processes and rationale. The Met is seeking to make it easier to record where force is used during a stop and search by amending the Use of Force form for officers to ensure they adequately account for their actions in a less bureaucratic way. For example, the pre-population of some elements of the recording form on the newly introduced electronic form e5090 (search record).
- Negotiation and de-escalation skills
These are expert skills that some officers naturally possess, but others need to be trained so that they can get better at avoiding language that might escalate tension in some situations. A revised eight day public and personal safety training timetable, with an online preparation module provides additional time for student constables to become more competent and confident when engaging with our communities.
- Deployment of officers in larger numbers
It is often necessary to deploy in large numbers where it is required to keep everyone safe; but there are occasions where officers miss the

opportunity to publicise or explain the reasoning better. This is something the Met will ensure features as part of its messaging if and when this occurs, to inform and reassure gathering crowds as to what is happening and why.

- **Deployment of safety officers**
It is not always possible to deploy safety officers but experience shows that when this is done, it works well and reassures those present that officers are in control and that someone is in charge of what can sometimes appear to the public to be chaotic. This works very well when clearly demonstrated and remains an option open to us in event planning.
- **Supervision, scene and post event support / scrutiny**
BWV provides supervisors with a very powerful opportunity to review incidents and provide active evidenced feedback and key learning on what works well for individual officers and what is less effective, which in turn provides development opportunities and leads to behavioural change.

7. Efficiency and effectiveness of complaints and conduct investigations

- 7.1 When discussing timeliness of complaint and conduct investigations, the context of the MPS's operating model for professional standards is important to understand. At present, the DPS are a centrally managed team under the governance of the Professionalism portfolio led by AC Ball. DPS deal with all triage, recording, referral and allocation of complaints and conduct matters. Matters initially triaged as 'gross misconduct' are allocated to the DPS for further investigation. Cases triaged as 'misconduct' or 'not subject to special procedures'³ are allocated to local Professional Standards Units (PSUs). These are teams that fall under the governance of Frontline Policing on the BCUs. DPS and their PSU colleagues work closely in relation to all complaint and conduct matters. DPS and IOPC investigations also rely upon PSUs to facilitate their investigations. Local PSUs deal with the vast majority of public complaints whereas DPS deal with the majority of conduct matters. DPS also have a dedicated team responsible for supporting all IOPC independent investigations and reviews.

³ Special procedures must be followed if: • the investigation concerns a recordable conduct matter; or
• at any time during an investigation of a complaint, it appears to the investigator (or the IOPC in a directed investigation) that there is an indication that a member of a police force or special constable to whose conduct the investigation relates may have committed a criminal offence or behaved in a manner that would justify the bringing of disciplinary proceedings (IOPC Statutory Guidance 2020)

Commander DPS has instigated a professional standards operating model review, which will receive project support, primarily through analysis, design and project management. Work streams will include:

- Demand and resource analysis: identifying and quantifying the key drivers of demand and the corresponding allocation of resources.
- Follow up to the Early Contact Team pilot (see 7.4): identifying and implementing 'quick wins' and longer term improvements.
- Process redesign and Target Operating Model (TOM): mapping end-to-end processes to test their efficiency and effectiveness, and building these into a coherent operating model incorporating all relevant business units. This will look at people, processes, policy and technology.
- Culture change: a joined up approach to improving communications and driving sustainable culture change to improve basic professional standards across the whole organisation.
- The design and implementation of an intervention process

This programme of work will seek to transform the way that public complaints are dealt with in the MPS by improving satisfaction, making the system more accessible for our communities, improving timeliness and reducing demand. To aid oversight MOPAC (Judith Mullett) also sit on the Transformation Board chaired by the Commander DPS.

Table 7 shows average complaints timeliness in working days (date received to case finalised) for 2020/21 vs 2019/20. Across the MPS as a whole the number of days to complete complaint cases has increased by 18 days. There are a number of factors which may have contributed towards this. The 24% increase in the number of complaints recorded in 20/21 will be a significant factor. The vast majority of those complaints are investigated by local PSUs with the same number of officers and staff as previous years. There has also been a focus on finalising some of the longer and more challenging complaint cases. As timeliness figures are based upon 'received to finalised', the closure of many of those cases in succession has impacted on timeliness figures in the short term. In addition, the impact of COVID may also be a factor. Officers across DPS and PSUs were abstracted to assist with the MPS's response to COVID and there were abstractions due to COVID-related sickness also.

Table 7 - Complaints Timeliness			
	2019/20	2020/21	Difference
MPS	137	155	+18
DPS	217	209	-8
Local	128	151	+23

7.2 Table 8 shows average conduct timeliness in working days (date received to case finalised) for 2020/21 vs 2019/20. Across the MPS as a whole the number of days to complete conduct cases has decreased by 51 days. The majority of these cases are dealt with by DPS. There has been a significant focus on timeliness over the last 12 months and the conduct matter timeliness figures have improved but there is still work to do to improve in this area.

Table 8 – Conduct Timeliness			
	2019/20	2020/21	Difference
MPS	292	241	-51
DPS	351	316	-35
Local	195	156	-39

7.3 A number of actions are being taken to in order to maintain oversight and improve timeliness of complaint and conduct investigations.

7.4 The Early Contact Team (ECT) pilot was a project recently led by the DPS Complaint Support Team and ran for two months. It focused on a single BCU, SN (South Area) and has now concluded. 51% of the complaints processed were resolved outside of schedule 3 without having to be formally recorded. A further 47% were recorded to be handled proportionately and only 2% required investigation. The current average duration of an investigation is 146 (working) days, the average ECT engagement time was 18 minutes, if scaled up across the service it is proposed that this would deliver a substantial cost and time saving and significantly reduce complaints within schedule 3. Following the success of the pilot, an Inspector has now been seconded to the Transformation Project to up-scale this model across the Met as part of the Professional Standards Operating Model Review. SN BCU are continuing the good work of the pilot by retaining a PC who was dedicated to the pilot to resolve as many complaints to the satisfaction of the complainant as possible. It will be part of the full time role of the Inspector seconded to deliver this project to spread the message of the ECT and to encourage the BCU/OCUs to move more towards the methods of the ECT in advance of the full implementation. Deliveries in this regard have already taken place at PSU staff Continuous Professional Development (CPD) days. An

input is also planned on the Appropriate Authority (AA)⁴ CPD day on 24th June 2021.

- 7.5 A performance framework has been in place for several years within DPS, with aspirations aimed at improving the quality of investigations and improving timeliness and case closure, underpinned by an effective process of governance and reporting. Work is underway with Strategy and Governance to extend this framework to the PSUs and the review of the MPS Professional Standards model will also take this into account.
- 7.6 Monthly performance meetings are held with local PSUs, chaired by DPS and pan-London AA professional development days are held quarterly. DPS Prevention and Learning have visited every PSU to review workload and ensure best practice across PSUs is shared. The DPS OCU Commander holds peer meetings with those B(O)CU Commanders with the largest performance challenges and professional standards risks, for example those BCUs that have multiple cases under the Complaints and Conduct Reflection Scheme or have significant IOPC interest. Performance is also reviewed monthly at the DPS Commander's scrutiny meeting and this is shared with MOPAC at a further monthly meeting for discussion and accountability. DPS Senior Leadership Team (SLT) also meet quarterly with IOPC and MOPAC at the IOPC/MPS Quarterly Oversight Meeting where performance and learning in relation to complaint handling, appeals/reviews and referrals is discussed.
- 7.7 Benchmarking across regulatory touch points (recording decisions, severity assessments and determinations) has been introduced, to ensure that AAs are supporting the strategic priorities of the MPS. SLT-led dip sampling of DPS investigations is in place to support quality assurance and key checks against regulatory requirements, proportionality and timeliness.
- 7.8 DPS cases are subject to dip sampling and audit. This is modelled on the MPS's Dedicated Inspection Team (DIT) auditing process designed and implemented following the HMICFRS's child abuse inspection in 2016. Complaint and conduct cases are selected at random and reviewed for quality and timeliness in accordance with the designed process. They are rated and returned to Investigating Officers (IOs) and their supervisors for any remedial action. Any learning is disseminated to all investigators.

⁴ The Appropriate Authority (AA) for a person serving with the police is the chief officer with direction and control over the person serving with the police. In the MPS the Commissioner is the AA. AA decision making is delegated to Inspectors and above. There are AA's within DPS and on local PSUs who have been trained and have the knowledge and experience to make AA decisions on behalf of the Commissioner. The Scheme of Delegation sets out the rank of officer that can perform the role of AA for certain decisions.

- 7.9 The performance and audit team has recently been moved under the governance of the Performance and Learning Portfolio and the ambition is to enhance this to provide coverage across PSU investigations in addition to those being investigated by DPS and to increase sample sizes.
- 7.10 There has been full implementation of new ways of working put in place after Continuous Improvement work in DPS conducted in 2019, utilising technology and more efficient working practices to help manage time consuming aspects of investigations and misconduct hearings.
- 7.11 Greater focus has been placed on stakeholder engagement (IOPC, Police Superintendents' Association, Police Federation, Unions) with escalation protocols to address barriers to progression and continued understanding of each other's priorities. Closer alignment with the Directorate of Legal Services and the CPS has been put in place, to help support early decision making, receive investigative advice and empower Investigating Officers to maintain focussed investigations.
- 7.12 Considerable effort has been given to progressing Misconduct Hearings, which can add a great deal of time to the completion of cases. Pre-pandemic there were 101 cases awaiting a hearing. , This figure has now reduced to 78 cases ⁵, a 23% reduction. The Misconduct Hearings Unit has also introduced new ways of working, in particular using technology to support online hearings.
- 7.13 Similar effort has been given to reducing the numbers of officers who are placed under restrictions or suspended, to minimise the impact of a lengthy investigation, ensure a consistent approach and to balance the risk to the organisation, the welfare of the officer and the need for operational resilience. Commander DPS is the single decision maker for suspensions and the DCS for DPS for restrictions. A policy has recently been drafted and is due to be finalised at the end of June 2021. This will inform a consistent approach to all suspensions and restrictions and also includes guidance on the impact of restrictions on officer's private lives, for example, requiring them not to contact an alleged victim. This is particularly relevant around concerns over police officer perpetrated domestic abuses and sexual offences for which the Commander DPS holds a monthly Gold Group on.
- 7.14 Currently the MPS has 39 suspended officers⁶; their position is reviewed every 28 days. Many of these cases are very serious allegations and involve long protracted criminal cases. Those that can be progressed to Special Case Hearings (now Accelerated Misconduct Hearings) are, but

⁵ Current figure as of 11th June 2021

⁶ Current figure as of 8th June 2021

many cannot be due to the upcoming criminal trial. There are currently 297⁷ restricted officers whose position is reviewed on receipt of any significant update in the case. The starting position in any decision is to consider opportunities of keeping the officer as operational as possible. For example a recent thematic review into armed officers who are on restrictions has seen a number made more operational in order to ensure the public are getting the best service possible. This is always a carefully balanced decision taking into account public interest and confidence.

8. Performance compared to other forces

- 8.1 The difficulties of reporting on national comparisons at present are highlighted earlier in this paper. Once the IOPC publish the 2020/21 data, this will provide a more useful dataset. When considering the national position, the MPS accounted for 20% of all complaints recorded in England and Wales in 2019/20, an increase from 17% in 2018/19. (IOPC data for the 10 months to the end of Jan 2020.) Eleven forces (including the MPS) saw an increase from 2018/19 compared with 2019/20 even when comparing a 10-month period in 2019/20 with the whole of 2018/19.
- 8.2 In 2019/20 (10 months to end Jan '20) across England and Wales, 243 allegations were recorded per 1,000 employees. The MPS recorded 265 allegations per 1,000 employees.

9. Outcomes

- 9.1 The following data details the outcomes for 2019/20 and 2020/21:

⁷ Current figure as of 8th June 2021

Meetings/Hearings

Type	Values	19-20	20-21
Meeting	Number of Hearings	176	135
	Number of Officers	201	155
Hearing	Number of Hearings	83	57
	Number of Officers	94	62
Hearing - Special Case	Number of Hearings	28	21
	Number of Officers	28	21
Accelerated Hearing	Number of Hearings	0	5
	Number of Officers	0	5
Total Number of Hearings		287	218
Total Number of Officers		323	243

Number of Officers - by Finding

Type	Finding	19-20	20-21
Meeting	Proven	133	113
	Not Proven	61	38
	Proceedings Discontinued	0	1
Meeting Total		194	152
Hearing	Proven	56	51
	Not Proven	28	11
	Proceedings Discontinued	8	0
Hearing Total		92	62
Hearing - Special Case	Proven	28	20
	Not Proven	0	1
Hearing - Special Case Total		28	21
Accelerated Hearing	Proven	0	5
Accelerated Hearing Total		0	5
Grand Total		314	240

Total Proven	217	189
Proven as % of Total	69%	79%

Number of Officers with 'Proven' Finding - by Sanction

Type	Sanction	19-20	20-21
Meeting	Final Written Warning	5	12
	Final Written Warning Extension	0	1
	Management Advice	73	36
	No Action	15	9
	Proceedings Discontinued	0	0
	Refer to AA for RP	0	4
	Refer to AA for RPRP	0	2
	Written Warning	40	49
Meeting Total		133	113
Hearing	Dismissal With Notice	0	0
	Dismissal Without Notice	17	16
	Would Have Been Dismissed	13	9
	Final Written Warning	15	18
	Final Written Warning Extension	0	0
	Management Advice	0	4
	No Action	3	0
Written Warning	8	4	
Hearing Total		56	51
Hearing - Special Case	Dismissal With Notice	0	0
	Dismissal Without Notice	17	13
	Would Have Been Dismissed	10	6
	Final Written Warning	1	1
No Action	0	1	
Hearing - Special Case Total		28	21
Accelerated Hearing	Dismissal	0	3
	Would Have Been Dismissed	0	2
Accelerated Hearing Total		0	5
Grand Total		217	190

Total Dismissed/Would have been dismissed	57	49
Dismissed as % of Total Hearings/Special	68%	64%

2019/20

- 54% of Hearings resulted in a dismissal without notice or would have been dismissed
- 96% of Special Case Hearings resulted in a dismissal without notice or would have been dismissed
- 68% of ALL hearings resulted in a dismissal without notice or would have been dismissed

2020/21

- 49% of Hearings resulted in a dismissal without notice or would have been dismissed
- 92% of Special Case/Accelerated Hearings resulted in a dismissal without notice or would have been dismissed
- 64% of ALL hearings resulted in a dismissal without notice or would have been dismissed

Panels and chairs comply with Conduct Regulations, the Home Office Guidance and the College of Policing (CoP) Guidance on outcomes when discharging their duties. When considering outcomes, panels and chairs first assess the seriousness of the misconduct, taking account of any aggravating or mitigating factors and the officer's record of service. The most important purpose of imposing disciplinary sanctions is to maintain public confidence in and the reputation of the policing profession as a whole. This dual objective must take precedence over the specific impact that the sanction has on the individual whose misconduct is being sanctioned.

10. Prevention and Learning

- 10.1 The DPS is committed to prevention and to enabling learning within the MPS. The DPS have a Prevention and Learning portfolio, which is responsible for supporting the MPS to learn and be as proactive as possible to help prevent officers and staff attracting complaints and being vulnerable to misconduct. The portfolio was restructured in 2019 as part of a DPS change programme and is led by a Superintendent.
- 10.2 This portfolio is also responsible for the continuous professional development of the pan-London AA and PSU network. As a consequence of a recent restructure, the portfolio also manages the Complaint Support Team (CST), which reviews all complaints and conduct matters within the MPS. This helps to ensure that the severity of all cases are assessed in a consistent way prior to the allocation of complaint/conduct matters to the

DPS (Gross Misconduct) or to the PSUs (Misconduct and Reflective Practice).

10.3 Reflective practice

New regulations, intended to create a better learning environment for officers came into effect from 1 February 2020. These changes allow colleagues the opportunity to undertake Reflective Practice with their line manager if their performance requires improvement, by discussing how the issue can be avoided in the future, accepting what happened and then moving forward - instead of facing punitive action for minor issues. The NPCC lead's ambition is for 80% of cases, in time, to be dealt with through reflective practice.

Alongside this the threshold for disciplinary action was raised, meaning misconduct proceedings will only be triggered if the wrongdoing justifies at least a written warning, whilst low-level outcomes have been removed.

This change has been welcomed and the MPS was an early adopter. A review of the first 9 months in the MPS showed that 19% of conduct matters and 57% of public complaints are being dealt with via reflective practice. As highlighted above, there have recently been a small number of cases where we have seen differences between DPS decision makers and the IOPC in relation to severity assessment. Initial assessment of some matters by DPS are assessed as suitable for 'reflective practice' whereas IOPC have assessed as misconduct or gross misconduct. The MPS and the IOPC have a healthy and consultative relationship but the differences in initial assessment in some of these cases is a matter of note to all concerned.

10.4 Complaints and Conduct Reflection Scheme

A Complaint and Conduct Reflection Scheme (CCRS) was introduced across the MPS in September 2020 and replaces the Complaint Intervention Scheme. In its new form, the CCRS places more emphasis on learning, seeking to support a change in individual and team behaviour. It adopts a risk-based approach to complaint and conduct trends rather than assessing an individual only when they hit a predefined number of complaints. The scheme also highlight situations where organisational learning or innovation can be gained from Complaint, Conduct and Civil Action data.

The CCRS is a 5 stage process that starts with DPS circulating two streams of data to the local PSU, a 12-month complaint and conduct history for all staff and team analysis data in respect of events, enabling a comparison between teams and units over the previous 12 months. The

PSU manager chairs a local monthly meeting to risk assess each case identified. They will consider the data stream and decide whether an individual would benefit from the opportunity to reflect and put an action plan in place to support the officer to reflect and learn. The London Policing Ethics Panel have recently concluded and reported on a review of Special Case Hearings, which has resulted in a risk matrix being developed. On the 24th June 2021 this will be introduced at the AA continuing Professional Development day as a support tool to manage individual and team trends.

To further support the “from blame to praise” model, a new reflective practice intervention scheme is being developed. This is a formal system to document line manager conversations regarding poor performance at a low level which can be drawn from the CCRS data or a line managers own observations. This electronic form would document the action plan in a central database and has been developed in conjunction with DPS, HR and the Deputy Commissioner's Delivery Group. Three BCU's have been identified as pilot sites South Area (SN), South East (SE) and North Area (NA), which should commence in the first week of July and run for 3-6 months. Data from these reports will be fed back into the CCRS to improve its findings and identified organisational learning shared. The emphasis of this work is to focus MPS leadership on prevention and changing internal culture in a positive and reflective manner.

10.5 Organisational Learning Committee

DPS have a monthly Organisational Learning committee, chaired by Commander DPS. This includes the IOPC Oversight Manager and MOPAC Head of MPS Oversight – Governance and Professionalism alongside key DPS stakeholders. All IOPC, MOPAC and other sources of learning are reviewed, discussed and actioned appropriately.

10.6 National Group Participation

The MPS are key contributors to the Regional and National Strategic groups on Complaints, Conduct and Anti-Corruption. Learning identified is shared across all forces. The MPS are also heavily engaged and meet regularly with contacts in the Home Office to share learning, best practice and inform policy and guidance. This engagement is critical as many of the challenges and trends seen in the MPS around complaints and misconduct are shared on a national level.

MPS Ethical Social Media and Online Communication Principles 2020

Social media is defined as any websites or computer program that allows people to communicate and share information on the internet using a computer, mobile phone or other electronic device. These MPS principles apply to the use of all forms of social media, including Facebook, LinkedIn, Twitter, Google+, Instagram, Tumblr, WhatsApp, Telegram and all other social networking sites, dating sites, internet postings and blogs. They apply to the use of social media for policing purposes as well as personal use that may affect the MPS in any way.



Social media platforms present a unique opportunity to promote a positive image of the MPS as well as providing an efficient way of sharing information, knowledge and best practice when used appropriately. Social media platforms should be used to engage positively with communities and build public trust. Our collective efforts on social media platforms should seek to build confidence in the MPS and you should therefore not undermine our organisation or the Police Service in the content you post. You should have regard to these principles, the Standards of Professional Behaviour and the Code of Ethics whenever you are using social media in a personal or professional capacity.



Occasional personal use of social media during working hours is permitted so long as it does not involve unprofessional or inappropriate content, does not interfere with your duties and responsibilities or productivity and adheres to these principles.



You should apply the same professional standards to your online communication as you would to your face-to-face, telephone or e-mail communications, whether on or off duty. Social media should never be used in a way that breaches any of our other policies or the Standards of Professional Behaviour. If a social media post would breach any of our policies and/ or the Standards of Professional Behaviour in another forum, it will also breach them in an online forum.



Content, comments or posts on social media must not:

- Undermine operational, investigative or criminal justice processes (e.g. be in contempt of court),
- Contain information, imagery or video which is protectively marked, could breach confidentiality or data protection laws,
- Breach copyright laws (e.g. using someone else's images without permission),
- Divulge sensitive operational and covert tactics (e.g. public order tactics being deployed or covert techniques),
- Provide details of an investigation or operation (particularly those involving covert tactics) without SIO approval,
- Make defamatory or libellous comments or make discriminatory or bullying comments,
- Provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the organisation and create legal liability for both the author and the organisation,
- Be capable of bringing the Police Service into disrepute, damaging the reputation of the organisation and/or undermining public confidence.

MPS Ethical Social Media and Online Communication Principles 2020



Your online associations must be considered in the same way as those people you meet in person and must be declared accordingly. If an online association falls into one of the categories listed within the Declarable Associations Policy, you must declare those you know of to the MPS. The Declarable Association policy defines an association as more than merely passing or casual (e.g. followers on Twitter would not be deemed an association).



Personal electronic devices (i.e. devices not supplied by the MPS) including mobile phones, tablets and laptops, must not be used to send operational police information. Police information must not be stored on or transmitted to personal devices via any means.



The use of messaging services to send police information (i.e. information which is security classified under the Government Security Classification), which operate through a central server, typically those provided by social media platforms e.g. Facebook Messenger, Twitter DM, SnapChat must not be used. Only those platforms approved by the MPS may be used. In any case, information should only be shared with those who require and have the authority to view it.



You should remain aware that the content of your private or group chats on messaging services might not remain private. All individuals have a responsibility to moderate their group conversations or leave those groups where the communications are unacceptable. If you are the group administrator, take care in selecting the membership and review regularly. Careful consideration is required when including those within a group who are outside of the organisation. Social groups must be kept separate from any groups that share operational information. If you share operational information via social media platforms or online communication services, you must consider your disclosure responsibilities under Criminal Procedures and Investigations Act (CPIA) 1996.



Whilst it is ultimately your decision, for your own personal safety, it is recommended that you do not disclose your position as a MPS employee. Whatever you decide, you should avoid disclosing any personal details, which may identify your home address, or other sensitive details about yourself. If you do disclose your association with the MPS, you must consider whether it is appropriate to discuss your role within MPS. You must never reveal the security clearances [vetting levels] of either yourself or that of other police service personnel. You should also make it clear in social media postings, or in your personal profile, that you are speaking on your own behalf and always ensure that your profile and any content you post are consistent with your professional image as a police officer or member of police staff.



Inappropriate content or messages posted by MPS personnel on social media platforms or messaging services must be reported or dealt with as you would if the behaviour had occurred offline. The Code of Ethics places a positive obligation on you to do so.



If you are in doubt about the use of social media platforms or messaging service apps, you should seek advice from your line manager. You may also wish to consider seeking advice from the DMC or DPS Prevention and Learning team where necessary.



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7th October 2020

Dear Chief Constable,

Launch of thematic focus on race discrimination investigations

This Summer [we announced we would launch race discrimination](#) as our next thematic area of focus to help identify the trends and patterns which should help drive real change in policing practice. I am pleased to confirm we have now started this work.

As you know the relationship between the police and the public is an important one, and central to that is public confidence that policing is fair and equitable. Thematic case selection involves independently investigating more cases where racial discrimination may be a factor in order to develop a body of evidence to identify systemic issues which should be addressed. This will hopefully help us capture areas of learning and further improve community confidence.

The areas we are focusing on include those where there is an indication that disproportionality impacts people from Black Asian and Minority Ethnic (BAME) communities (including stop and search and use of force) and where victims from BAME communities have felt unfairly treated by the police.

In addition to our independent investigations, we will also draw evidence from relevant cases where we review the appropriate authority's handling of a case. This will help develop a body of evidence to drive real learning and change. This will also assist us to identify and share good practice as well as learn from what has not worked as well.

In order to select such cases, it will be important for us to have access to accurate ethnicity data of the relevant complainant or injured / deceased / interested party. We are therefore asking forces to please ensure ethnicity data is provided when making referrals to us whenever it is available. This extends to ensuring such information is forwarded to us if it becomes available after the initial referral has been sent. This will allow us to properly consider whether a referral should be selected for investigation

under the thematic area; in other words, where we know the person involved to be of BAME background, and for the circumstances set out above.

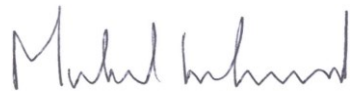
We will of course continue to investigate the most serious and sensitive cases, and where race discrimination is a factor, this will be included in our body of evidence.

This year we have seen a significant increase in race-related referrals, and as a consequence independent investigations. These cases referred to as 'core thematics' will also form part of our thematic work on race discrimination.

Should you have any questions regarding this please do contact the oversight team on oversight@policeconduct.gov.uk who will be able to assist you further.

Many thanks for your help and support.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Michael Lockwood". The signature is written in a cursive style with a large initial "M".

Michael Lockwood
Director General
Independent Office for Police Conduct (IOPC)



Independent Office
for Police Conduct

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26 May 2021

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Dear Chief Constable,

Update on IOPC race discrimination thematic work

I am writing to you in my role as IOPC strategic lead for discrimination, to provide you with an update on the IOPC's race discrimination thematic work and to ask for your assistance with this important area of focus.

In September last year, the IOPC launched race discrimination as a thematic case selection area, as set out by Michael Lockwood, Director General in his letter to Chief Constables on 7 October 2020. Since the launch of this theme, the IOPC has taken on a significant number of additional independent investigations where race discrimination may be a factor and we are undertaking thematic analysis of these cases as a body of evidence to inform learning.

Our analysis will include looking at all independent investigations involving issues of possible race discrimination opened since the launch of the theme in September 2020, as well as any other relevant and recent cases from before this date. It will also include looking at relevant cases dealt with locally by police forces that we see on appeal and review.

We plan to publish an update on the progress of this work in Summer 2021 giving an indication of the types of cases and issues we are seeing and any emerging learning, with a final report at the end of the 2021/22 financial year showing the full impact of this work.

Underpinning this thematic analysis, the IOPC is investing in improving its handling of issues of race discrimination with increased training, advice and support for staff handling discrimination issues, from our multidisciplinary discrimination subject matter network.

However, we are only one part of the police complaints system. It is vital that all parts of the complaints and oversight system work towards the same common goal if we are to make real change in improving confidence in relation to how issues of race discrimination are explored and addressed.

On this basis, it is a concern that, across most forces, discrimination complaint allegations continue to be upheld at significantly lower rates than most other types of allegation. Our published [2019/20 Police complaints statistics](#) show that, 90% of investigations into discrimination complaint allegations were dealt with as non-special requirements investigations (where the threshold for an indication of misconduct was not found to be met). Across these cases, only 2% of discrimination complaint allegations were upheld. This compares with 11% upheld across all complaint allegations dealt with at the same level (investigated not subject to special requirements).

As you will be aware, this is not a new issue.

Similar concerns were identified in [work undertaken by our predecessor organisation the IPCC](#) and informed the decision to issue detailed guidelines on handling allegations of discrimination in 2015. It is of concern to the IOPC that there appears to have been little change in complaint outcomes in an area that has such significant impact on public confidence and resonance at this time.

Without question, investigating allegations of discrimination is challenging. However, the police complaints system must be able to meet this challenge and provide effective complaint handling in relation to issues of discrimination. By doing so there is an opportunity to improve trust and confidence across all communities.

I am aware that many police forces and local policing bodies, alongside the National Police Chiefs Council, are actively looking to see where they can make improvements to address longstanding issues around race discrimination, workforce diversity and low confidence in policing within particular ethnic communities. As part of this work, I would urge you to consider what more your force can do to also understand and address any particularly low levels of upheld rates in respect of discrimination complaints in your forces.

Our thematic work will allow us to look in more detail at local handling of race discrimination complaints where we see these cases on appeal and review and we will look for opportunities to share learning around handling discrimination allegations with forces through our Oversight team.

We would be interested to hear about any actions your force is taking in this respect and where you may have learning and good practice examples which we could draw on and help disseminate nationally. Our Oversight team will be following this up with their contacts at professional standards departments and local policing bodies and will discuss opportunities to work together to share learning and make improvements.

Should you have any questions regarding this please do contact the [Oversight team](#) who will be able to assist you further.

Many thanks for your help and support.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sal Naseem', with a stylized flourish at the end.

Sal Naseem

Regional Director for London and Strategic Lead on Discrimination
Independent Office for Police Conduct (IOPC)