

## FOI Disclosures July 2021

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If you require a full copy of any of the embedded attachments, please contact [Requestinfo@policeconduct.gov.uk](mailto:Requestinfo@policeconduct.gov.uk) quoting the reference number from the relevant response.

<b><u>Ref</u></b> <b><u>1009309</u></b> <a href="#">Back to top</a>	<b><u>Trainee investigator diversity</u></b>
<b><u>Request</u></b>	<p><i>Between 2000-2021 how many male white trainee investigator Canary Wharf were offered jobs after training programme?</i></p> <p><i>Between 2000-2021 how many male white trainee investigator Canary Wharf failed training programme?</i></p> <p><i>Between 2000-2021 how many male white trainee investigator Canary Wharf were former police officer or CID?</i></p>
<b><u>Response</u></b>	<p>We have understood your request as relating to persons recruited to grade 9 IOPC Trainee Investigator roles. While, for the reasons given below, we cannot provide the specific data you require, we would refer you to the data tables below. These tables disclose data relating to:</p> <ul style="list-style-type: none"><li>• the ethnicity and gender of all Trainee Investigators recruited by the IPCC/IOPC</li><li>• the ethnicity and gender of Trainee Investigators recruited to Canary Wharf office</li></ul>

1. Ethnicity of Trainee Investigators recruited to all IPCC/IOPC offices from 2013 to the present

Asian Bangladeshi	1
Asian Indian	9
Asian Other	2
Asian Pakistani	4
Black African	5
Black Caribbean	2
Black Other	4
Chinese or other Chinese Ethnic Background	1
Mixed White and Black Caribbean	3
Mixed White Asian	2
Not stated	1
Other	3
Other Mixed Background	5
Undefined	2
White	207
White Irish	4
<b>Total</b>	<b>255</b>

2. Gender of Trainee Investigators recruited to all IPCC/IOPC offices from 2013 to the present

Male	84
Female	171
<b>Total</b>	<b>255</b>

3. Ethnicity of Trainee Investigators recruited to Canary Wharf office only: 2018 to the present

White	12
Other	10
<b>Total</b>	<b>22</b>

4. Gender of Trainee Investigators recruited to Canary Wharf office only: 2018 to the present

Male	6
Female	16
<b>Total</b>	<b>22</b>

Please note that this data relates to persons recruited as Trainee Investigators from 2013 onwards, when the Trainee Investigator programme was first introduced. Canary Wharf office was opened in the summer of 2018, meaning that no persons were recruited to that office before that time.

All Trainees who complete the programme are eligible to apply for a job as a Grade 10 IOPC Investigator. A small number of the persons recruited nationally as Trainees either do not complete their training, do not move into an Investigator role, or are delayed in becoming an Investigator. This is for a wide variety of reasons, often arising from their personal circumstances, meaning that it may not be said that these Trainees 'failed' their training because they were not subsequently moved into an Investigator role.

It is relevant that Trainees who become Investigators may or may not be based at the office at which they received their training. Some Trainees may change offices during their training or after they have taken up a role as an Investigator. It is likely, therefore, that some persons who were recruited as Trainees at Canary Wharf have accepted an Investigator role at a different IOPC office, while others may have become an Investigator at Canary Wharf after commencing their training elsewhere.

For these reasons our data does not enable us to produce the specific information you require about Canary Wharf Trainee Investigators. Searches of our employee data aimed at identifying the locations at which Investigators who were formerly Trainees began or completed their training have confirmed that we cannot reliably track individuals between different posts and IPCC/IOPC offices.

It is clear, however, that across the whole of the IOPC very few Trainees do not move on to Investigator roles. As a result, the number of Canary Wharf trainees who did not do so on completion of their training in the year to 31 March 2021 is likely to be very small. This means that if we were able to source this data we could not disclose the ethnicity of these persons as required by your request without breaching data protection rules relating to 'Special Category Data. This is because, owing to the very small numbers involved, they would be identifiable to their colleagues and others together with their ethnicity. As a result, such information would engage the exemption under section 40(2) of the FOIA if it was available.

It should be noted that we rarely recruit former police officers as Trainee Investigators. This is because the Trainee programme is aimed at people with no previous investigative experience. All former police officers attend comprehensive IOPC training but the training they receive is different to that of Trainees, due to their previous experience. The number of former police officers recruited to Trainee roles at Canary Wharf in the year to 31 March 2021 is therefore likely to be none. Again, even if we were able to source this data accurately and the number was not zero, the small numbers involved would mean that we could not disclose that any such persons were 'white males' without identifying them in breach of data protection rules relating to the disclosure of 'Special Category Data'.

The IOPC records and reports on data about our employees who are former police officer or civilians but we do not retain comprehensive records of their previous career history, for example, as to whether they worked in CID or another specialism at any time during their policing career. Therefore we cannot provide this information.

The IOPC publishes staff diversity reports that include data as to the ethnicity, gender and policing background of its staff by grade, directorate and location. The 2019-20 report is available [here on our web site](#). We anticipate that our staff diversity data for the year to 31 March 2021 will be published by the end of August.

This request appears to be motivated by concerns about the diversity of our work force. Unlike our published diversity data, we do not believe that the specific data requested could be helpful in deciding whether the IOPC workforce at Investigator or Trainee grade is sufficiently diverse, or whether it favours persons from certain backgrounds, owing to the very small numbers involved.

	<p>While our current black, Asian and minority ethnic representation is a respectable 16% of our workforce (compared to 20% general representation across England and Wales, and 14% of the working population) we recognise we are still under-represented in a number of areas. The IOPC is focused on improving equality, diversity and inclusion with the objective of becoming an employer of choice for people from all diverse backgrounds. This work includes a review of our recruitment practices which has resulted in the introduction of a Success Profiles framework, a new Recruitment and Selection policy, and the use of Positive Action interventions, such as targeted advertising and pre-application workshops. Further details of our work in this area will be confirmed under our Equality Diversity and Inclusion Strategy which will be published later this year.</p>
<p><b><u>Ref</u></b> <b><u>1009313</u></b> <a href="#">Back to top</a></p>	<p><b><u>IOPC's travel management contract</u></b></p>
<p><b><u>Request</u></b></p>	<p><i>You asked a number of questions regarding the IOPC's travel management contract.</i></p>
<p><b><u>Response</u></b></p>	<ul style="list-style-type: none"> <li><i>The start and end date of the current contract including any potential extension periods.</i></li> </ul> <p>The contract start date is 20 August 2018 and the end date is 26 February 2022. The contract can be extended for a further 12 months.</p> <ul style="list-style-type: none"> <li><i>The current supplier(s) on your contract.</i></li> </ul> <p>Corporate Travel Management</p> <ul style="list-style-type: none"> <li><i>Is the contract linked to any framework?</i></li> </ul> <p>Crown Commercial Services RM6016</p> <ul style="list-style-type: none"> <li><i>The actual expenditure to date on the contract</i></li> <li><i>Pre-covid expenditure on the travel contract</i></li> </ul> <p>We have decided that we are unable to release this information to you by virtue of an exemption provided at section 43 of the FOIA. Our specific reasons for withholding the information are set out in the Annex to this letter.</p> <ul style="list-style-type: none"> <li><i>Do you have any plans for the next travel procurement, if yes please could you advise me of the timetable?</i></li> </ul> <p>The next procurement for this requirement will be at the end of the contract via the new CCS framework.</p>
<p><b><u>Ref</u></b> <b><u>1009342</u></b> <a href="#">Back to top</a></p>	<p><b><u>SAR quality control process</u></b></p>
<p><b><u>Request</u></b></p>	<p><i>You asked a number of questions regarding the subject access (SAR) quality control process and the police complaint review process</i></p>
<p><b><u>Response</u></b></p>	<p><i>1) What is the SAR quality control process?</i></p>

All proposed subject access disclosures and redactions are reviewed by myself as the IOPC's Data Protection Officer (DPO). I make an assessment as to whether the law has been applied correctly, fairly and justly. Any elements of the proposed disclosure that require further approval and risk assurance are referred to the senior colleague who 'owns' the information and has responsibility for assurance and data compliance for data within the relevant department, known as the Information Asset Owner or IAO.

*2) Who carries out quality control on SAR?*

The Data Protection Officer and, where necessary the relevant IAO.

*3) What qualifications and experience do quality control staff members have?*

As explained above, the key staff member responsible for quality control of proposed SAR disclosures is the DPO. The law requires that a DPO must have appropriate professional qualities and expert knowledge of data protection law and practices to fulfil the role.

*4) How does a quality control staff member ensure impartiality?*

The DPO is an independent role with responsibility to monitor and impartially advise the IOPC on compliance with data protection law. The quality assurance process includes checks and balances at the appropriate level and means that all proposed disclosures and redaction rationale are reviewed by at least two members of staff. We are also subject to regulation by the Information Commissioner's Office and must demonstrate our rationale and compliance in response to their assessments of our subject access request responses.

*5) From 2018 how many SAR have been overseen by quality control?*

All SARs undergo the quality control process. From January 2018 to 20 June 2021 we have responded to 712 subject access requests.

*Can you please provide the following on the PSD IO Report case review:*

*1) what is the PSD case Review process?*

The review process is explained on our website [here](#). This sets out the process when the IOPC receives a review as follows:

When the IOPC or the police force receives your complaint, it will check whether it is the right organisation to handle your complaint. If not, it will forward your review or appeal to the relevant review or appeal body and inform you that it has done so.

The relevant review or appeal body will send you a letter to acknowledge your review or appeal. They will tell you how long it's likely to take to consider your review or appeal.

The relevant review body will notify the organisation you complained about that you've applied for a review or appeal. They will also notify the person complained about and any other interested persons.

The relevant review or appeal body will ask the organisation that you complained about to provide it with any information they have about your complaint and how they dealt with it.

When all of the information has been supplied, the relevant review body will assess your review or appeal and make its decision. You will be told about this decision in writing. You will receive a clear explanation about how this decision has been reached.

### *2) what qualifications and experience do the case review managers have?*

The required qualifications and experience for the role of casework manager, whose role involves assessing police complaint reviews, is shown on the latest job description as follows:

#### **PERSON SPECIFICATION**

#### **KNOWLEDGE, EXPERIENCE and QUALIFICATIONS**

- Good general education with at least two A' Levels or equivalent.
- Relevant experience, of complaints handling or of dealing with a direct service to the public where contentious and difficult issues have to be dealt with sensitively.
- Evidence of well developed critical thinking skills, a capacity to conduct enquiries, obtain information and to use sound judgement to reach conclusions.
- Evidence of strong communication skills, particularly written.
- Computer literacy is essential.
- Proven ability to show initiative and contribute in a changing environment.
- Successful candidates will be expected to undertake appropriate training and development leading to an accredited qualification.

Casework managers are also currently offered the opportunity to study for the BTEC Professional Certificate Level 5 in Casework Management .

### *3) how does the case review manager ensure impartiality?*

We have a robust quality assurance procedure to provide checks and balances on the decision-making of casework managers and ensure consistency. Additionally there are measures in place to mitigate the risk of any bias or other deficiency on the part of IOPC employees.

Our recruitment process relies on evidence of merit and appropriate skills and the performance of staff is regularly monitored and reviewed in accordance with our performance and development review process. Any shortcomings in performance or conduct are addressed in line with the relevant policies. As explained above, there is also a robust quality assurance process in place to provide suitable

	scrutiny of casework decisions. The IOPC therefore has confidence in its staff being able to carry out their review assessments to the required standard.
<b><u>Ref</u></b> <b><u>1009326</u></b> <a href="#">Back to top</a>	<b><u>Investigation relating to PC Benjamin Kemp</u></b>
<b><u>Request</u></b>	<ol style="list-style-type: none"> <li>1. <i>What charge(s) did you as an organisation consider it might be possible to level at Benjamin Kemp?</i></li> <li>2. <i>Why was the decision made to deal with Benjamin Kemp's "excessive use of force" as a solely internal disciplinary matter - leading to his summary dismissal on grounds of gross misconduct as opposed dealing with this as a criminal / legal matter?</i></li> <li>3. <i>Who was responsible for making that decision?</i></li> </ol>
<b><u>Response</u></b>	<p><i>Question 1</i></p> <p>We have decided that we are unable to release this information to you by virtue of an exemption provided at section 40(2) of the FOIA which relates to personal data.</p> <p><i>Questions 2 and 3</i></p> <p>After considering the final investigation report and accompanying evidence, and as required by the Police Reform Act, the IOPC decision maker decided there was an indication a criminal offence may have been committed by PC Kemp. He referred the investigation to the Crown Prosecution Service (CPS) to consider whether a criminal prosecution was appropriate. The CPS decided not to bring any charges against PC Kemp. Decisions relating to pursuing, or not pursuing criminal charges, lie solely with the CPS and are beyond the remit of the IOPC.</p>
<b><u>Ref</u></b> <b><u>1009355</u></b> <a href="#">Back to top</a>	<b><u>Complaints and outcomes</u></b>
<b><u>Request</u></b>	<p>1 <i>How many police were reported for anything since 1st March 2020 to today's date.</i></p> <p>2 <i>How many police have been punished in one way or another since 1st march 2020</i></p>
<b><u>Response</u></b>	<p>We understand your first question to be asking for the number of complaints made about police conduct since March 2020.</p> <p>We collect information from all police forces in England and Wales about the number and type of complaints they are receiving, and we publish these statistics each year. We also publish quarterly performance data for all police forces. Our latest published report covers the year 2019/20 and can be found on our website <a href="#">here</a>. The report relating to 2020/21 will be published shortly and this will contain the information you are requesting.</p> <p>We understand the second part of your request to relate to the outcomes of police complaints.</p>

	<p>You may not be aware that the majority of police complaint and misconduct cases are dealt with by the police without any IOPC involvement. The IOPC investigates only the most serious and sensitive cases.</p> <p>This means that we do not hold records that comprehensively reflect the outcomes of all complaints made about the police, we only hold records relating to our own independent investigations.</p> <p>If you require information about outcomes of all police complaints, then you would be advised to approach the individual police forces. Contact details can be found using the following link: <a href="https://www.police.uk/forces/">https://www.police.uk/forces/</a></p> <p>We have recently published two reports that set out the outcomes of our own independent investigations of the most serious and sensitive matters, for <a href="#">2018/19</a> and <a href="#">2019/20</a>.</p> <p>The outcomes reported on are as follows:</p> <ul style="list-style-type: none"> <li>• the decision the IOPC makes about whether or not someone has a case to answer as a result of our investigation.</li> <li>• the decision to refer to CPS for a criminal charging decision and the CPS charging decision</li> <li>• the results of criminal or misconduct proceedings.</li> </ul> <p>It is significant to note that the IOPC does not determine sanctions following misconduct or criminal proceedings. We play a pivotal role in investigating and deciding whether there is sufficient evidence to suggest a case to answer or an indication that a criminal offence may have been committed but are not the ultimate decision-makers when it comes to deciding the sanction as a result of those proceedings.</p> <p>Our published outcomes data is the result of an extensive data verification exercise in respect of the outcomes recorded under our investigations during these two years.</p> <p>We anticipate publishing outcomes data for 2020/21, which will cover the time period you have requested, in the near future and will then publish subsequent outcomes data annually.</p>
<p><b>Ref</b> <b>1009366</b> <a href="#">Back to top</a></p>	<p><b><u>Corruption allegations</u></b></p>
<p><b><u>Request</u></b></p>	<p><i>* Please disclose the number of allegations of corruption by officers received by the IOPC in 2019, 2020 and to date in 2021.</i></p> <p><i>* For 2020 and 2021, please provide a breakdown showing the number per force and outcomes in each case. For example: if GMP had 30 corruption referrals, 20 were designated local, five investigated by IOPC etc.</i></p> <p><i>* Please disclose the number officers currently being investigated for corruption by the IOPC.</i></p>
<p><b><u>Response</u></b></p>	<p>The IOPC does not extract data about allegations from the referrals it receives from police. As a result we cannot produce the data under the first two parts of your request without studying all referrals and related evidence. We would have to carry out similar manual searches of our investigation files to identify the persons under investigation for alleged corruption. Owing to the high number of cases</p>

and related documents we would have to search, the work involved in finding and extracting the specific information you require would exceed the cost limit under section 12 of the FOIA.

However, we are providing the following [data tables](#) by way of advice and assistance. When we receive a referral, it is assessed, and then a Mode of Investigation (MOI) decision is made. This is where we decide whether the matter will be investigated independently by us, or whether for the force should investigate the matter, or whether we return it to the force for them to deal with as they see fit. This data relates to the number of referrals received and completed from 1 April 2019 to 31 March 2020 and from 1 April 2020 to 31 March 2021 for which the 'corruption/perjury' case factor was selected on our case management system. This does not include referrals from Police and Crime Commissioners or equivalent bodies. The totals for the individual forces for the completed by MOI decisions are in **bold**.

The following caveats should be taken into account when interpreting this data:

- Case factors are manually selected by operational staff to help identify the circumstances of a case and should be used for illustrative purposes only. The selection of this case factor is only an indication that corruption/perjury was a theme in the complaint, conduct matter or Death or Serious Injury matter referred to the IOPC. Therefore, the data we are providing confirms neither the number of allegations of corruption/perjury that have been referred to the IOPC, nor the number of persons involved in any alleged corruption. For example, a single referral may relate to the conduct of a number of officers but include an allegation of corruption against only one of them. On further consideration, it may be determined that more than one officer, or none, should be formally investigated for alleged corruption.
- A number of case factors or sub-factors may be selected on a single case with the result that the number of recorded factors is very likely to exceed the number of referrals or investigations. For example, while a total of 61 corruption factors/sub-factors were recorded in respect of Avon and Somerset Constabulary referrals completed in the year to 31 March 2020, this should not be understood as corresponding to 61 separate referrals, as some of these referrals may have more than one factor selected against them.
- A single investigation may be based on a number of referrals as referral cases may be linked under a single investigation and matters may be re-referred. Therefore, the data we are providing does not confirm the number of investigations started.
- As this information has been extracted from our live case data for the purposes of your request, it may differ from data we have published in relation to the same period.

You may also find [our published data relating to investigation outcomes in 18/19 and 19/20](#) to be helpful. This includes a [breakdown of the offences charged](#) and whether these resulted in a guilty or not guilty verdict.

**Ref**  
**1009349**

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**Referrals relating to Cressida Dick**

<b><u>Request</u></b>	<i>Under the Freedom of Information Act 2000, I would like to request any documentation of complaints referring Cressida Dick to the IOPC</i>
<b><u>Response</u></b>	<p>Searches of our case management system have identified three cases involving referrals to the IPCC and IOPC concerning the conduct of Cressida Dick.</p> <p>The first of these cases was the IPCC investigation into the shooting of Jean Charles de Menezes at Stockwell underground station on 22 July 2005. Extensive information about this case including the IPCC investigation reports is available on the website of The National Archive <a href="#">here</a>.</p> <p>The second case was connected to Operation Midland and is the subject of <a href="#">this IOPC news release</a>.</p> <p>The third case was a referral of a complaint matter received in 2020. We have decided that the disclosure of any further details of this case would engage the exemption under section 40(2) of the FOIA meaning that we are not obliged to release this information.</p>
<b><u>Ref</u></b> <b><u>1009360</u></b> <a href="#">Back to top</a>	<b><u>Deaths by suicide</u></b>
<b><u>Request</u></b>	<i>A list of all cases investigated since 2016 in which a person reported being stalked to police and later died by suicide. Please list by the date of the investigation beginning and provide the following information: the age and gender of the person committed suicide, the force who received the stalking complaint, the date of the suicide, the name of the person who killed themselves and details of the case.</i>
<b><u>Response</u></b>	<p>The methods available to identify this information have some limitations, as the definitions used to categorise types of cases do not directly match your request. Therefore, the numbers provided should only be used for indicative purposes.</p> <p>The IOPC reports annually, on a financial year basis, deaths during or following police contact. One category of death that is reported on is 'other deaths following police contact'. These deaths are all, by definition, subject to an independent investigation. Within this category, the deaths are further grouped based on the reason for contact with the police prior to their death. The two most relevant groups for your request are 'domestic related' and 'threatening behaviour/harassment'.</p> <p>The timeframe looked at for your request is deaths that occurred between 2015/16 and 2019/20. We have not considered more recent deaths, because the reporting of deaths within this category will be included in our 2020/21 report 'Deaths during or following police contact: Statistics for England and Wales 2019/20. These cases are still in the process of being verified and checked.</p> <p>During this time period, there were 110 fatalities that fell under the category 'other deaths following police contact – independent investigation' where the reason for contact was 'domestic-related' and 34 where the reason for contact was 'threatening behaviour/harassment'. Where known, the death classification for 28 of the domestic-related fatalities and for 6 of the fatalities relating to</p>

threatening behaviour/harassment were from self-inflicted acts, a total of **34**.

In the circumstances of these 34 cases, the deceased may not have directly reported 'being stalked' as you request asks for, but would have been involved in either a domestic-related incident or an incident where concerns were raised regarding threatening behaviour or harassment by another person.

As per our definition, domestic-related incidents may include those between family members, such as incidents involving parents and their children. In addition, the person involved in the incident who died may have been the subject of counter allegations as part of the domestic-related incident reported to the police. Any apparent suicides of the perpetrator that follows an alleged or attempted murder are also included in the statistics within this category.

We have assessed whether we are able to provide a dataset that exactly meets the requirement of '*all cases investigated since 2016 in which a person reported being stalked to police and later died by suicide*'. However, there would be a considerable level of manual scrutiny of case files required to provide this data. We have determined the activities involved would exceed the cost limit, as prescribed by section 12 of the FOIA and associated regulations. As such, we have provided the details requested for all cases falling within the parameters of your request insofar as we are able to publicly release this information. Details relating to these 34 cases are provided in the accompanying [spreadsheet](#).

As part of your request you have asked for the names of the deceased. The enclosed spreadsheet does not provide the name of the individual who died where the IPCC/IOPC involvement has not been made public (whether by the IOPC or by another organisation). In some instances, the IOPC investigation is ongoing and we have not yet released the name of the individual. The names have also been omitted in these situations. We are relying on exemptions under sections 30 (investigations and proceedings) and 40 (personal data) of the FOIA to refuse this information.

In the case of information falling within the terms of section 30, we are refusing your request because the public interest in maintaining the exemption outweighs the public interest in disclosure.

The month and year of death is provided for all cases; the exact date of cases has only been provided for those cases where we are able to disclose the name of the deceased.

The spreadsheet also lists the police force involved in the case, and the date that the investigation began.

For each death a link to a press release on the case has been provided where this is known. Please note that not all of these are IPCC/IOPC press statements. Their inclusion does not indicate our verification of the information they contain. Where a link to a press release has been provided, this will give a brief description of the circumstances of the case as requested.

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