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**Report to:** People & Standards Committee  
**Agenda item:** 7  
**Date:** 16 May 2013  
**Subject:** London South Complaint Profile  
**Sponsor:** Detective Superintendent Alistair Lawson  
**For:** Information

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## **1. Introduction**

1.1 This report has been compiled to provide analysis of Complaint Allegations made against British Transport Police (BTP) personnel across the London South (LS) Area between January 2011 and December 2012. This analysis follows a previous report conducted on data covering the period 2009/10.

## **2. London South Area**

2.1 As at 19 March 2013 LS Area had 412 Police Officers, 43 Special Constables, 39 PCSOs and 97 Police Staff, comprising a total of 591 employees.

2.2 In keeping with the 2009/10 report, the crime hotspots across LS Area are the terminals of London Victoria, London Waterloo and London Bridge. It is worth noting that despite the volume of offences, all three terminals recorded above average detection rates when compared to the whole LS Area and Force as a whole.

Recorded crimes on LS Area between 1 January 2011 and 31 December 2012

<b>Location</b>	<b>Undetected</b>	<b>Detected</b>	<b>Total</b>	<b>Detection Rate</b>
VICTORIA H01	1261	1172	2433	48%
WATERLOO H01	810	877	1687	52%
LONDON BRIDGE H01	545	636	1181	54%
EAST CROYDON H10	292	637	929	69%
CLAPHAM JUNCTION	480	401	881	46%
BRIGHTON	357	459	816	56%
MITCHAM EASTFIELDS	176	568	744	76%
FELTHAM	180	347	527	66%
MORTLAKE	136	359	495	73%
CHARING CROSS H01	227	251	478	53%
London South Total	24762	18829	43591	43%



- 2.3 It should be noted that offences recorded at Feltham are heavily weighted towards ‘ Less Serious Line of Route and ‘Less Serious Other’ while offences recorded at Mortlake are overwhelming classified as ‘Less Serious Other’.
- 2.4 Offences across LS Area are recorded as most likely to occur ‘On Trains’ (8,970 offences) with a detection rate of 27%, significantly lower than detections for offences that occurred at the second most common location type of ‘On Platform’ (5,530 offences with a 60% detection rate). Additionally, the third most common location of ‘Cycle Shed’ had a much lower detection rate of 18%, resulting from 4,680 offences.

**3. Complaints**

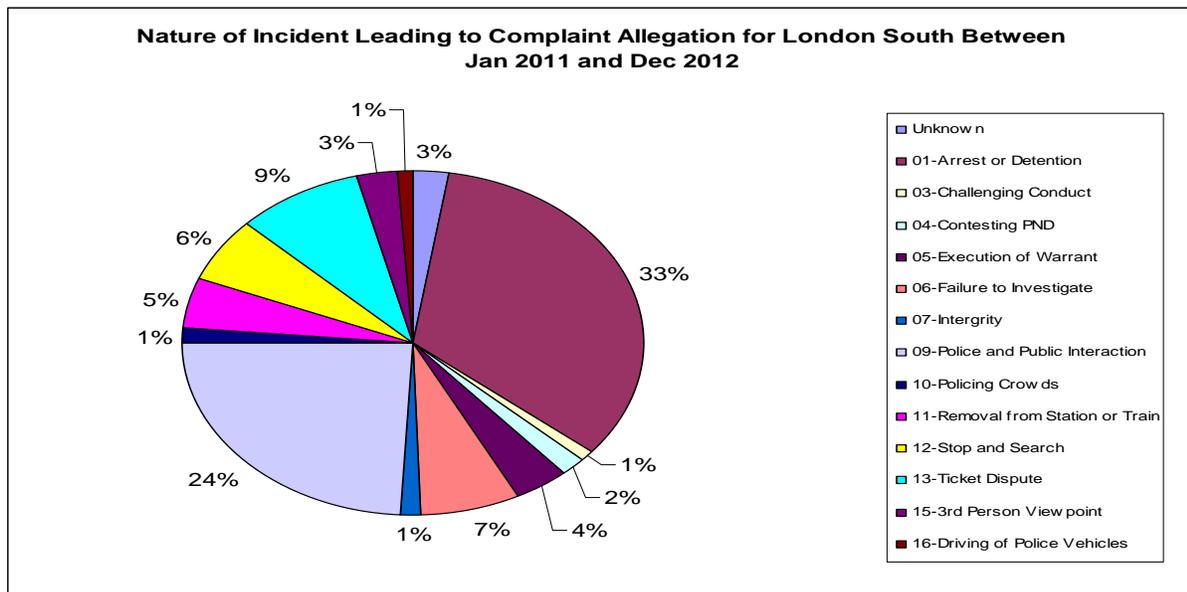
- 3.1 Consistent with previous findings, the core complaint allegations are ‘Incivility, impoliteness and intolerance’, ‘Other assault’ and ‘Other neglect or failure in duty’.
- 3.2 Complaint volume on LS Area has declined from an average of 9 complaints a month to 7. This reduction in the monthly average of complaints is a continuation of an already established trend indicating a long term decline in complaint volume across the Area.
- 3.3 While LS Area has the highest number of complaints of any BTP Area, it also records the highest number of detections per officer. It can therefore be inferred that while the volume of complaints made against LS officers is high, this is matched by a high level of efficacy on the part of the Area’s officers when detecting crime.

<b>BTP Area</b>	<b>Rank of Average detections per Officer (Apr 2011 - March 2013<sup>1</sup>)</b>	<b>Rank of Complaint Allegations per 1000 Officers (Jan 2011 - Dec 2012)</b>
London South	1	1
North Western	2	3
North Eastern	3	2
Wales and Western	4	4
London North	5	5
London Underground	6	6
Scottish	7	7

<sup>1</sup> This period is representative of two financial years.



- 3.4 Key complaint locations across LS Area are Waterloo, Victoria and London Bridge. These 3 stations all have exceptionally high passenger footfall compared to other terminals. Consequently, the number of passengers equates to a challenging demand on police resources, leading to greater opportunity for complaint.
- 3.5 During the 24 month period covered by this report, there were 20 allegations (relating to 8 separate cases) flagged in Centurion as having been made around custody suites across LS. Currently, limitations in the recording of complaint cases inhibit comprehensive analysis of custody suites although there is limited evidence to suggest that a currently unquantifiable proportion of those allegations attributed to London Victoria should be regarded as having occurred at other locations.
- 3.6 For the complaint allegations received in LS Area during the period, 51% were received by BTP within one week of occurring, 67% were received within 28 days. Of note is that 23% of allegations were received the same day as the incident occurred.
- 3.7 It can be seen in the following chart that the most common type of incident that lead to a complaint are those that involve 'Arrest or Detention' (101 complaint allegations). The key allegations that stem from this incident type are 'Unlawful/Unnecessary arrest or detention', 'Other assault' and 'Other neglect or failure in duty'.



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- 3.8 The second most common type of incident that lead to a complaint involved 'Police and Public Interaction' (74 complaint allegations) perceived as inappropriate by the complainant. The single most common allegation type stemming from these incidents was 'Incivility, Impoliteness and Intolerance', comprising 46% of all resultant allegations. Additionally, other prominent factors within this category were 'Discriminatory Behaviour' (10%), 'Oppressive Conduct or Harassment' (10%), 'Other Neglect or Failure in Duty' (9%), 'Other Assault' (7%), 'Lack of Fairness and Impartiality' (4%) and 'Other' (4%).
- 3.9 When combining those factors that involve direct officer contact with a member of the public for policing purposes (e.g. 'Arrest or Detention' and 'Stop and Search'), the total percentage situations generated by a front line policing purpose that lead to a complaint is 61%.
- 3.10 Overall, it can be concluded that the frequency of contact with the public, together with the manner in which contact occurred is clearly an overriding factor within the origin of complaints made across the Area.
- 3.11 Disposal trends across the period indicate that 'Not Upheld – by Division' is the most common outcome of a complaint allegation in the LS Area, followed in volume by 'Not Upheld – by PSD' indicating that the majority of complaints lacked sufficient substance to be processed toward a sanction for the subject.
- 3.12 When comparing complaint levels within BTP London Areas to the complaint volumes seen in comparable London Boroughs, those Boroughs located within BTP LN Area recorded consistently higher levels of complaints overall than their counterparts in southern Boroughs. Principally this trend stems from the population of London and consequently overall MPS workload is weighted towards Boroughs that fall within BTP's LN Area.
- 3.13 The key cross cutting theme between BTP and Metropolitan Police Service (MPS) is that complaint volume is broadly in keeping with passenger/population volume, with the core difference between BTP and MPS being that while MPS policing is based around
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communities, BTP is focused on the comparatively transient passenger population present on the public rail network.

- 3.14 Analysis of key complainant characteristics indicates that on average complainants are male, aged approximately 39 years, self define their ethnicity as 'White' and define their occupation broadly as 'Non-manual' worker. Overall this creates an overarching impression in line with previous reporting that core complainants are predominantly middle aged, white, male 'professionals' who have objected to the manner in which a member of frontline staff has interacted with them personally, during the course of their duties.
- 3.15 Instances of individual officers being subject to multiple complaints were rare during the period, with only four officers being the subject of 5 cases each in the period (the maximum for any one officer). It should be noted that even when officers are subjected to multiple allegations, the majority are still resolved with a result of 'No Case to Answer'. This trend is in keeping with overall trends that see 62% of allegations made against subjects resulting in a 'No Case to Answer' across the period.

#### **4. Control Methods**

- 4.1 In order to manage the risks around staff misconduct and corruption, the subject intervention process was established in BTP PSD in July 2011. The process evaluates subjects who have either had two complaints or conduct cases in the last 12 months or are within the top 12 of individuals for overall volume of complaint and conduct cases Force wide. Additionally, ad-hoc referrals can be made from any other source.
- 4.2 Since the adoption of subject intervention LS Area has seen more of their officers submitted to the process than any other BTP Area. It should be noted however that LS only marginally recorded more personnel submitted to the process than the comparable LN Area.
- 4.3 From mid 2012 BTP adopted the service recovery process as a means to more efficiently deal with dissatisfaction against the police and prevent minor dissatisfaction



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needlessly turning into official complaints. Organisationally, the emphasis of Service Recovery is to ensure that the response to internal and external dissatisfaction is proportionate to the nature of the case.

- 4.4 To date, the adoption of service recovery by the LS Area has been increasing quarterly since implementation, in line with wide trends across the Force as a whole.
- 4.5 Ongoing efforts exist to proactively improve officer performance and frontline customer service. This is being achieved through the enhancement of officer education and training towards improvements in the interaction between the police and the public, in addition to the enhanced management of challenging policing situations when they arise.

## **5. Recommendation**

- 5.1 That members note the content of this report.