



## **Police Committee**

**Date:** FRIDAY, 14 SEPTEMBER 2012  
**Time:** 1.45 pm  
**Venue:** COMMITTEE ROOMS, WEST WING, GUILDHALL

## **ITEM 8 APPENDICES**

**Chris Duffield  
Town Clerk and Chief Executive**

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## Integrity Re-inspection 2012 - Force Feedback

Force: City of London Police

Date of Inspection: 10/11 July 2012

### Overview – Progress since the last inspection

Since 2011 the Force has developed an Integrity Action Plan with ownership by the Assistant Commissioner and reviewed at the management board meetings.

The previous gifts and hospitality registers have now been consolidated into a single register, owned by the head of PSD. The recently approved ACPO guidance for gifts and hospitality, media and secondary employment is being implemented as policy across the Force and all staff have been made aware through different ‘broadcasts’ via email and intranet.

The Force completes checks in relation to information disclosure, media messages and leaks. It also completes routine checks and audits of gifts and hospitality and corporate cards and expenses spends. In addition, the Force has reviewed all departments’ allocations of corporate cards although this has not seen a noticeable drop in numbers.

Since the last review PSD has conducted an organisation-wide threat assessment and developed a PSD strategic threat assessment. This is currently being reviewed by the Force Management Team and will go to the Corporation for review. The Counter Corruption Unit (CCU) resource levels remain the same as last year, with access to covert resources provided by MOUs with South Eastern Region. There are no plans to change these resourcing levels.

### Workstream Specific Feedback -

#### 1. Governance and Oversight

- All Policies with the PIR element that have been subject to ACPO review have had changes made to them. All have been renewed and re-circulated out to staff via intranet ‘broadcast’ and email.
- PSD has a monthly meeting with the Assistant Commissioner (AC); this is by way of a set agenda and covers: all audits, media contact, corruption, top 10 expenses and overtime earners, mobile phone reports and corporate card spend. PSD also has exception

meetings with the AC outside this when required.

- The Corporation Committee is intrusive and challenges cases and decisions made by PSD at the quarterly meeting. PSD prepares a quarterly report to the Committee prior to the meeting. This report covers all cases including Police Staff and the Committee is also provided with all IPCC statistics.
- City of London Police (CoLP) has produced an 'Action Plan' based on the *Without Fear or Favour* self-assessment questionnaire; this is owned by AC Armstrong and is reviewed at the Force Management Team meetings. It assigns an action owner and red, amber, or green status to each of the self-assessment questions.
- PSD refers to the IPCC when required and has done so on recent investigations. The Head of PSD speaks weekly with the IPCC representative and they have a good relationship. There is a formal meeting every two months to discuss investigations and PSD issues.

## **2. Relationships with the media and others**

- Staff were clear that any contact with the media had to go via the Communications Department. Reminders are sent out to staff surrounding high profile cases that may have particular media interest in CoLP. A brief will go out about the incident then a statement informing all staff to send any queries to the Communications Department.
- The Force has adopted the ACPO media advisory document and has recently recruited a new head of corporate communications.
- The Communications Department logs and keeps a central register of all media interaction. This register is kept on software called 'Vuelio' and was set up in October. 'Vuelio' has been enhanced by the recent head of communications so the Force can run reports by subject, staff member or date. There are six licenses for individuals within the Communications Department and the Force is in the process of applying for more to cover the Force Control Room inspectors for out of hours use. At present they enter information retrospectively, or if of a serious nature will contact media on call.
- The software 'Vuelio' logs all contact with the media and this has the ability to have reports printed off and examined. These reports are sent to PSD which will pass onto the AC if relevant.
- The City of London Police has had cases involving relationships with private investigators and these have been dealt with proactively. PSD liaises with surrounding forces and shares intelligence on those staff who have left the police and are starting their own PI business. It proactively monitors these individuals and any relationships with serving staff.
- PSD acknowledges that 'other relationships' is a particular area of risk within the City of London. This is due to the contacts and networks made between serving officers and city companies. There is a lot of cross over with many ex-officers now working for private city companies.

### 3. Information disclosure

- Posters have been circulated reminding staff of guidance regarding Facebook and Twitter. Guidance has been circulated via the intranet and via emails from PSD. Probationers are given training surrounding social media by PSD and staff are unable to access social media from work IT.
- The Communications Department uses 'HOOT SUITE' software to monitor all social media coverage. It also monitors all media coverage daily and anything it is unhappy with, or that has not been recorded onto the register, it passes to PSD. It also produces a monthly report of all media contact for PSD.
- Staff are aware of policies and are notifying PSD when they come across inappropriate use of social media by other staff members. An example of a female officer who had been in a fight off duty and then placed photos onto Facebook was given. This is being dealt with by PSD.
- Staff are clear about policies of information disclosure and data protection. There have been recent cases regarding information disclosure with staff being dismissed. This prompted another reminder to go out to all staff about the data protection obligations and the consequences.
- 'Barracuda' software provides an active monitoring tool for internet access, however it provides limited information for reactive investigation of breaches, this is to be superseded with WebMarshal.
- Lessons from integrity issues are fed into the organisational learning forum and then fed back Force wide.

### 4. Gifts and Hospitality

- Staff confirmed that there had been a change of Gifts & Hospitality policy. Guidance and policy is available to all staff on the intranet 'sharepoint' web page and is easily accessible. All staff were aware that any G&H had to be authorised prior to acceptance.
- All G&H should be recorded onto the IT Sharepoint central register but the recording of declined gifts and hospitality is not mandated. Senior officers view high numbers of offers to attend corporate events 'as part of the job' but would always decline if it was felt to be inappropriate, for example G&H from a contractor. PSD refers to the AC for rulings on specific offers.
- The Committee took the view that hospitality is normal in the city. It is satisfied that both it and the Force are proportionate in their approach. It would be expected that the Commissioner of the City of London Police would respond favourably to an invitation from a key stakeholder if invited out for dinner. Although the invitations must be proportionate, relevant and justified.
- The Corporation checks the Gifts and Hospitality register and expects it to be updated regularly and it is published on the Force website. However, the register does not capture declined offers and there was an absence of understanding within the Corporation as to why this would be considered important.

## 5. Procurement and contracts

- Staff were aware that new procedures have been issued surrounding the use of corporate cards. They can no longer be used to buy gifts, i.e. welfare or thank you gifts.
- The Force does not complete additional vetting of staff who are issued with cards and it was apparent that the process to obtain one was relaxed. There has not been any profiling of units that would need them or the limits that should be placed on individual cards. Many card holders had credit limits which they had never, and were unlikely to ever, reach.
- In a Force of approximately 1,210 staff there are currently 378 cards issued (approximately 31% of the Force) and comment was made several times that having a card was seen as a 'status symbol' or 'as a part of the job'.
- There has been a recent review of all cards, with some holders returning them. Staff had noticed a more stringent scrutiny of spends and use over the last year. If staff fail to reconcile statements monthly then their details are sent to the AC and the card will be cancelled.
- There is no formal training but when a card is sent to a member of staff they are sent a link to the Standard Operating Procedures and links on the IT system to give guidance on how to use them. Staff have to sign a corporate form which sets out their obligations with regards to use of the card.
- Limited training is given to those delegated with authority for procurement. There is a sole member of staff designated to procurement however his role is to give advice as opposed to provide oversight.
- Finance has oversight of all departmental budgets, therefore monitors all procurement made and had a recent review of all contracts. It compiles reports which go to PSD and then to the AC if trends or activity are suspicious. It also completes the top 10 earners and card 'spenders' for PSD each month.

## 6. Additional employment

- Staff are all aware that they have to declare business interests and secondary employment. Reminders about the policy have been sent out over the last year.
- PSD confirmed that there was an amnesty last September and this revealed 50 members of staff with other business interests. Some have been refused while others are under investigation since coming to light after the amnesty. This amnesty raised the awareness of all staff.
- PSD keeps the register of all authorised and refused applications updated on the Centurion IT system.
- PSD reviews every application when its 12 month renewal comes up and sends out reminders to supervisors to clarify if there are any issues about continuing the authority.
- The amnesty raised awareness and this caused other staff members to report against staff who they believed had not declared an interest.
- A 'Broadcast' went out to all staff and supervisors reminding them of their obligations and giving guidance. Supervisors are

responsible for letting PSD know on the renewal or first application about anything that may cause concern, for example, sickness or other absences.

## **7. Proactivity**

- The Force CCU exists within PSD but it is small and has a lack of resilience. Proactivity is a challenge and the Force is scoping collaboration opportunities. PSD has a MOU with the southeast region.
- There is a confidential reporting line via 'Safecall', however due to lack of use staff were asked whether the Force should keep it. PSD gave good examples of its use leading to investigations but there were mixed reviews on whether it was confidential or not. Officers said that Safecall would refer your call onto PSD which would then know your details.
- CoLP does not undertake drug testing. This is a difficult issue as all police staff are employees of the corporation not CoLP and the Corporation will not agree to it at this point. CoLP is looking at introducing testing for police officers.
- CoLP deals proactively with outsourced workers and contractors and all are thoroughly vetted. There was a recent case regarding inappropriate disclosure of information and this contracted member of staff was dealt with by PSD in liaison with the company and PSD is looking at data protection offences. PSD completes proactive auditing of systems and the Counter Corruption Unit has capability to live monitor several 'risk' IT systems. It integrity tests on an intelligence led basis. The Force use 'secret shoppers' to undertake quality assurance testing.
- PSD has risk assessed departments and ensures vetting is appropriate to each area. It oversees all vetting and ensures it is renewed.
- PSD completes examinations of mobile phone bills and this has led to a £3,000 reduction in spend over the last year.
- Since the last review PSD has conducted an organisation-wide strategic threat assessment and this will feed into both the Force and SOCA strategic assessments.

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## **ACTION PLAN – HMIC (2011) Without fear or favour: A review of police relationships**

Purpose: This action plan addresses HMIC self-assessment questionnaire contained within the above report. The questionnaire provides a facility for police forces to effectively understand and improve their effectiveness in relation to integrity.

Plan Owner: AC Frank Armstrong – City of London Police

Overall Target: To institute robust systems to ensure risks arising from relationships, information disclosure, gratuities, hospitality, contracting and secondary employment are identified, monitored and managed.

### **Section A: Relationships with the Media and Other Parties**

Self- assessment question	Action Owner	Actions to Deliver Target	Action Due Dates	Risks & Issues	Comments	Status (R/A/G)
1.1 What governance and oversight arrangements exist to ensure effective management of police employee's relationships with the media and others?	Head of PSD (HoPSD) Head of Corporate Communications (HOCC)	1) HOCC to review Media Policy against new ACPO Guidance. 2) HOCC to identify all media stories not approved by Corp Comms and refer to PSD for action.	01/07/12  01/07/12	1) Current Media Policy has 6 SOP'S, and does not reflect newly issued National Guidance. 2) Corp Comms monitor media stories, which have not been authorised. However, there is little evidence currently of appropriate	1.1.1 Corporate Communication's Media Policy is being reviewed to clearly illustrate we follow ACPO CAG guidance (including appendices). The six Media SOPs will be revised to one that underpins the policy. An additional social media SOP will be completed around use for work purposes. Both SOPs will contain hyperlinks to the relevant PSD SOPs. All will be published on the	

**Section A: Relationships with the Media and Other Parties**

Self- assessment question	Action Owner	Actions to Deliver Target	Action Due Dates	Risks & Issues	Comments	Status (R/A/G)	
					intervention.	intranet and awareness raising will take place. 1.1.2 The Media office in Corporate Communications will be tasked to set up a document to log any media stories that contain information not approved by the department. Any suspected breaches will be reported immediately to PSD. The new Media policy will state that all media releases (other than basic factual statements for general day-to-day inquiries as often dealt with by Control) to journalists must be approved through Corporate Communications. Completed August 2012	
1.2	Is there clear senior ownership and accountability in respect of the release of information to the media?	HoCC	Yes. Corp Comms monitor all press publications involving CoLP for compliance with policy.	01/07/12	Action 2 above will address gaps to ensure appropriate intervention when unapproved	As stated in 1.1.2, the new Media policy and underpinning SOP will make it clear what should be passed through Corporate Communication for sign-	

**Section A: Relationships with the Media and Other Parties**

Self- assessment question	Action Owner	Actions to Deliver Target	Action Due Dates	Risks & Issues	Comments	Status (R/A/G)
				stories are highlighted through monitoring.	off and what is allowable for general out-of-hours factual release – and when Media should become involved – along with the out-of-hours on call Media officer.	
1.3	What media policies/guidance exist and how are they communicated to staff?	HoCC	All force policies are subject to 3 yearly review, and are published on the Force Intranet, with clear links to National Guidance where appropriate.	01/07/12	Action 1 above will ensure media policies are reviewed, and appropriately linked to the newly issued National Guidance.	Given the constantly changing nature of communication plus the current topical issues surrounding relationships between the press and police, my recommendation as HoCC is that the Corporate Communications owned Media policies should be reviewed at six monthly intervals and at least updated every 12 months.
1.4	Are staff sufficiently knowledgeable of what the acceptable boundaries are regarding media relationships?	HoCC	On completion of policy review, an awareness of the new policy needs to be disseminated through internal Corp Comms and	01/07/12	Current policy under review.	Once the new policies are complete (by the beginning of July) they will be published in the Media section of the Corporate Communications intranet pages, plus the SOPs

**Section A: Relationships with the Media and Other Parties**

Self- assessment question	Action Owner	Actions to Deliver Target	Action Due Dates	Risks & Issues	Comments	Status (R/A/G)
		police orders. Updated National Guidance to be published on the Force Intranet.			(Media and Social Media) will be published within the A-Z SOP section on the CityNet Homepage. Communications and awareness raising for staff will take place.	
1.5	HoPSD	3) HoPSD to ensure risk and threats are fully taken into account in next PSD strategic assessment.	30.6.12	Damage to the force reputation of inappropriate disclosure of information to the media.	This should be included within the Corporate Communications departmental risk register as an ongoing monitored risk.	
1.6	HoCC HoPSD	4) HoCC to identify media publications not agreed by Corp Comms, and notify HoPSD for action on a monthly basis.	30.6.12 for process and time scales to be agreed.	Currently the force monitors unapproved media publications, however, there is no process to ensure appropriate investigation of such.	As outlined in 1.1.2, any suspected breaches should be logged on Vuelio (our Media operating software which also acts as our audit trail) and reported to PSD immediately they occur (not monthly in my view). A document log should also be kept of any breaches, that will help inform, over time, whether any 'trends' are emerging. Both HoPSD and HoCC should liaise on a monthly basis to	

**Section A: Relationships with the Media and Other Parties**

Self- assessment question	Action Owner	Actions to Deliver Target	Action Due Dates	Risks & Issues	Comments	Status (R/A/G)
					ensure the arrangements continue to operate effectively.	
1.7	HoPSD	PSD are responsible for awareness messages, and inappropriate disclosure of information policy, clearly identifies where breaches will occur and sanction that would be available. Action 3 above will ensure proactive measures, in addition to the re-active already available.	30.6.12	Whilst there are clear policies, and evidence of re-active investigation, there is currently no proactive identification of potential media leaks.	As in 1.1.2, any suspected breach of policy and information leak to the media, or suspected inappropriate relationship between staff and media will be reported to PSD.	
1.8	HoCC	5) HoCC to review training provided and ensure risk identified in the Strategic Assessment are addressed.	30.9.12	Training cannot be reviewed for effectiveness, until the Strategic Assessment identifies the risks.	HoCC will work with the HoPSD and the Media section of Corporate Communications to ensure our media training is reviewed to not only educate on the benefits of working with and liaising with the media,	

**Section A: Relationships with the Media and Other Parties**

Self- assessment question	Action Owner	Actions to Deliver Target	Action Due Dates	Risks & Issues	Comments	Status (R/A/G)
					but also the pitfalls; how to manage relationships appropriately, the inherent risks associated with working with journalists and the disciplinary outcomes of unauthorised disclosure.	
1.9	Does your media training include integrity and relationship management?	HoCC	PSD to be consulted in above review to scope involvement in media training and advise on course content	30.9.12	As listed above in 1.1.8, Corporate Communications and PSD should work together to provide a more holistic approach to media training that accounts for both the benefits and the dangers.	
1.10	How are engagements between staff and media representatives captured for transparency?	HoPSD HoCC	All staff are required to seek approval from Corp Comms, for all media publications. Unapproved publications are subject to monitoring. Furthermore, officers are required to report to PSD notifiable		Policy needs to be checked for compliance.	

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**Section A: Relationships with the Media and Other Parties**

Self- assessment question	Action Owner	Actions to Deliver Target	Action Due Dates	Risks & Issues	Comments	Status (R/A/G)	
			associations with members of the press, as per policy.				
1.11	How do you ensure formal and informal meetings and briefings with the media are appropriately recorded?	HoCC	Staff are required to consult Corp Comms, regarding all formal and informal briefings with the press. Unapproved publications are being monitored, and in future will be reported to PSD for investigation/action.			The new Media policy will reflect that all formally arranged meetings and briefings should involve Corporate Communications, in order for a record to be taken of the engagement. Informal briefings should also involve the department so this can be recorded. If this is not the case, then Corporate Communication should be made aware, a log taken, and the officer/s and/or staff involved should record the engagement and inform Corporate Communication of the outcome and information given.	

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**Section B: Information Disclosure**

Self- assessment question		Action Owner	Actions to Deliver Target	Action Due Dates	Risks & Issues	Comments	Status (R/A/G)
2.1	What governance and oversight arrangements exist to ensure effective management of information disclosure?	Director of Corporate Services (DoCS) as Senior Information Risk Officer (SIRO)	<p>Review of Web gateway tool identified several weaknesses in reporting and configuration, especially for supporting Social Media. SMB approved replacement of this product with Web Marshal, installation currently underway with an expected go-live of April 2012</p> <p>Barracuda provides an active monitoring tool for internet access however provides limited information for reactive investigation of breaches. This is to be superseded with Web Marshall.</p>			Web Marshall has been installed and is currently under test.	



2.2	Does the organization have strong leadership, accessible policies and robust assurance mechanisms to govern social media?	HoCC	Policy developed by the Head of IMS. Awaits approval from ACPO prior to force-wide implementation.  Policy needs be linked to appropriate PSD SOPs			Policy and SOP has been written and currently in consultation.	
2.3	What mechanisms exist in relation to preventing misuse, risk assessing, monitoring and managing professional and personal use of social media?	SIRO	As at 2.1			Corporate Communications is in the process of developing digital media engagement, which includes monitoring the professional use of social media for CoLP. A new SOP and Policy is being created around use, misuse and management, with links to the relevant PSD SOPs that refer specifically to acceptable personal use.	
2.4	Does the organisation have appropriate capacity and capability to effectively monitor and audit all its information	SIRO	Ongoing project to identify and install appropriate monitoring software. Following IMB on 15.03.12 it was agreed the Force			Currently awaits decision as to which of 3 companies is awarded tender.	

	systems, and practice an evidenced risk-based approach?		would engage consultants to assist it to identify 'information asset' owners.				
2.5	Does the organisation have a strong culture of disclosing associations with those connected with crime, members of the media and private investigators?	HoPSD	The Notifiable Associations' SOP requires officers to disclose this information to PSD. 6) HoPSD to arrange compliance check of policy.		Unauthorised associations may result in officers/staff becoming vulnerable to coercion. PSD have had 6 notifications in the past year, including media contacts and family members being arrested. All notifications are risk assessed by the DI, CCU and recorded on the PSD Intelligence Database.	Associations with the media have limited reporting whereas associations with those connected with crime are better reported.	
2.6	What control strategies exist in respect of individuals identified as vulnerable to inappropriate associations and	HoPSD	In addition to the Notifiable Associations SOP, a Service Confidence SOP exists. The former is the means by which		Staff failing to report such associations who may then become vulnerable because of the non-reporting.		

	corruption?		such occurrences are reported and recorded. The latter is a process by which individuals are overtly monitored an/or action-planned.				
2.7	Does the organisation have mechanisms in place to identify the risks of inappropriate disclosures as part of investigations into gratuities/hospitality/secondary employment and procurement?	HoPSD	The whole hospitality register is reviewed monthly by PSD and any unusual entries are investigated further. Business Interests have an in-depth risk assessment carried out as part of a robust system.				

### Section C: Gratuities and Hospitality

Self- assessment question	Action Owner	Actions to Deliver Target	Action Due Dates	Risks & Issues	Comments	Status (R/A/G)
3.1 What governance and oversight arrangements	HoPSD	The Gifts, Hospitality, Discounts and Donations' SOP			Police Authority hospitality reporting is overseen by the CoL Corporation and sits outside any CoLP	

	<p>exist to ensure effective management of gifts and hospitality by the force and police authority?</p>		<p>explicitly outlines what is acceptable. The Hospitality Register is electronically held on the Sharepoint Application, all entries require authorisation by the Directorate Head. The Register is subject to an ongoing audit by the Counter Corruption Unit with a monthly report being made to the PSD ACPO Lead. The SOP is broadcasted six monthly in Police Orders.</p>			<p>monitoring.  The responsibility for publication of Hospitality and Gifts Register on the external website is not clear, resulting in information available to the public, sometimes being out of date.</p>	
<p>3.2</p>	<p>Which department or function in force owns gratuities and hospitality policy?</p>	<p>HoPSD</p>	<p>PSD owns the policy and is responsible for monitoring, reporting anomalies, and investigation</p>				

			where necessary				
3.3	Does the gratuities and hospitality policy clearly articulate the process, framework and boundaries for decision making particularly in respect of monetary value, donor, organisation, loyalty cards, group discounts, free transport, appropriateness of accepting gifts and sponsorship? How is this communicated?	HoPSD	Yes, the new SOP mirrors national guidance.				Hospitality SOP and ATOC SOP to be linked
3.4	Are the links made within the policy to other integrity areas, i.e. procurement, estates, sponsorship,	HoPSD	No each area is separately subject of SOP under PSD policy/media policy and facilities management policies. 7) SOP'S				All policies to be hyperlinked once reviewed.

	media, business interests?		should be linked where necessary.				
3.5	Is there any triangulation of gifts and hospitality with other integrity areas, i.e. via IT systems or weekly meetings?	HoPSD	Yes monthly PSD data audit and meetings covering these areas, overseen by ACPO.				
3.6	What timescales exist for review of the policy considering the current economic climate, public perception and legislative changes?	HoPSD	All policies and SOPs are currently subject to a three yearly review. However, the policy has been re-written in line with the new ACPO Guidance.			Any changes in legislation/economic climate etc can be incorporated in any/all PSD SOPs as appropriate.	
3.7	What is the best format for the register to be maintained to allow accurate recording and oversight?	HoPSD	The register is held in electronic format in Sharepoint, to which officers have access to. This is also published on the external website.				
3.8	Is the process and recording of the rationale	DoCS	A Users' guide published on the front page on the				

	<p>for acceptance or refusal comprehensive to allow a clear audit process and transparency?</p>		<p>SharePoint entry page which provides details of how information should be entered and factors to consider when reaching a decision.</p> <p>On the entry scheme there is a 'Rationale box', which needs to be completed by the applicant. If insufficient rationale is provided the Line Supervisor can refuse acceptance until adequate detail is supplied. Authorisers need to satisfy themselves that adequate information is supplied in order for them to complete the decision making process.</p> <p>Directorate Heads</p>				
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			can also run reports to dip sample entries on the register to ensure compliance.				
3.9	Is the whole register published, i.e. not just chief officers?	HoCC	The whole Hospitality Register is published on the external CoLP web site. A decision has been made, that responsibility for the publication of the list, lies with the Information Access Officer.				
3.10	What differences exist (if any) in thresholds between the force and the police authority?	DoCS	<p>The CoL Corporation has a Code of Conduct Policy for all Staff. Within the Employee Handbook.</p> <p>Gifs of £20 are permitted, subject to Line Manager authorisation and recording on systems</p> <p>For Gifts the</p>		Hospitality within the City of London Corp and CoLP vary in terms of threshold and this results in CoLP Support Staff and CoL Staff working under different guidelines. This may be an area of 'conflict'.		



			<p>Force Policy appears more detailed in terms of threshold levels and levels of authorisation required but all threshold levels are always informed by the Guiding Principles of the Policy, the first of which is 'Avoidance and polite refusal is required whenever possible.'</p> <p>The principles and base threshold levels are comparable</p>				
3.11	What are the key risks and threats associated with gifts and hospitality and how does this link to an audit programme?	HoPSD	Corruption (real and perceived), inappropriate disclosure of information, abuse of Corporate credit cards, integrity and reputation of the Force.				

			Monthly audit of data is carried out by PSD and reported to ACPO.				
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Section D: Procurement and Contractual Relationships							
Self- assessment question		Action Owner	Actions to Deliver Target	Action Due Dates	Risks & Issues	Comments	Status (R/A/G)
Page 24	4.1	What governance and oversight arrangements exist to ensure effective management of procurement and contractual arrangements?	DoCS	CoLP adhere to CoL Standing Orders, and all contracts are vetted by the CoL Corporation Solicitors to ensure adherence to appropriate law and standing orders etc.			
	4.2	What are the delegated authority levels for procurement and are they effectively communicated and managed?	DoCS	The level of delegation is set out by the CoL Policy of Delegation. All guidance is available on the Intranet.			

4.3	What level of scrutiny does the police authority exert over procurement and contractual relationship?	DoCS	Police Committee seek reassurance that due governance has been undertaken by at least an independent statement within the committee report from City Solicitors. The committee will also ask searching questions if they have any concerns or seek greater detail.				
4.4	What controls over procurement and credit cards exist within the force?	DoCS	There is a Force SOP for Purchasing Cards published on the intranet. This details the permissible use of the card and authorisation levels required. It also includes available sanctions for non-compliance both for misuse and				

			<p>failure to complete admin processes. Financial limits for each card are set and authorised prior to issue at an appropriate level for predetermined use. Any spend on a card is subject to management scrutiny and must be authorised by a Line Manager in accordance with the SOP.</p>				
.5	<p>How would any irregularities of procurement and credit cards be identified?</p>	DoCS	<p>Each cardholder, upon receiving their card, is required to sign to confirm that they understand their responsibilities in relation to using the card.</p> <p>All card transactions are clearly identified on monthly transaction statements</p>				

			therefore any deviation from agreed policy can be easily identified by the cardholder peers, finance teams and audit process.				
4.6	What systems and processes exist to identify conflicts of interest within procurement processes?	DoCS	The CoLP has a dedicated procurements officer, guidance in relation to procurement and contracts is available on the force intranet, with clear links to financial regulations, and local authority guidelines.				
4.7	What systems and processes are in place to effectively manage expenses?	DoCS	All expenses must be authorised by a Line Manager prior to payment.  Finance Shared Services publish information re guidance / processes for the				

			<p>claiming of expenses.</p> <p>Management Accountants can highlight areas of concern to Directorate SMTs (via Additions to Pay report).</p> <p>CoL Corporation Audit Team conducts periodic financial audits to ensure robustness of processes and will include recommendations for improvements if required.</p>				
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<b>Section E: Secondary Business Interests and Conflict of Interest</b>							
<b>Self- assessment question</b>		<b>Action Owner</b>	<b>Actions to Deliver Target</b>	<b>Action Due Dates</b>	<b>Risks &amp; Issues</b>	<b>Comments</b>	<b>Status (R/A/G)</b>
5.1	What governance and oversight arrangements exist to ensure effective management	HoPSD	SOP for Business Interests has been re-written to reflect newly issued ACPO National Guidance. PSD	30.6.12		CoLP has 9 agreed Business Interests, which under the new ACPO Guidelines would be deemed incompatible. These are being reviewed and assessed by PSD.	

	<p>of secondary employment, associations and conflicts of interest?</p>		<p>have now assumed full responsibility for governance, oversight, and decision making from HR. 8) HoPSD to report to ACPO, requiring decision in relation to Business Interests agreed, which would now be deemed incompatible under the new policy.</p>				
<p>5.2</p>	<p>What policies and guidance exist in relation to secondary employment, associations and conflicts of interest for police officers and police staff? How are these communicated to staff?</p>	<p>HoPSD</p>	<p>There is a comprehensive policy available 24/7 on the Intranet (newly written policy about to be published). PSD held a 3 month amnesty, up to October 2011, enabling staff to report previously undeclared Business Interests, without fear of conduct</p>				

			proceedings. This amnesty resulted in 50 new business interests being declared.				
5.3	Does the secondary employment application provide sufficient detail to enable chief officer decision making on suitability, risk, compliance (tax & legal) and welfare?	HoPSD	Yes				
5.4	How is policy compliance and organisational risk monitored?	HoPSD	PSD Monitor broadcast messages (rental properties), and intervene when it appears a Business Interest is being advertised. amnesties, Business Interest applications are agreed by Directorate Head, and fully risked assessed by PSD, prior to				



			decisions being made.				
5.5	What is done to ensure a consistent approach in respect of the authorisation of secondary employment applications?	HoPSD	All applications are reviewed and authorised (or not) by the PSD ACPO lead giving a consistent approach. This follows an assessment by Directorate Heads				
5.6	Is there evidence of proactively in relation to secondary employment (approved and refused applications)?	HoPSD	There is evidence of intervention where issues are brought to PSD'S attention, however there is currently no proactive or covert monitoring.			HoPSD to discuss future process with Head of CCU.	
5.7	How often are secondary employments subject to (meaningful) review? Guidelines suggest a 12-month review or on any change to the	HoPSD	Every twelve months by PSD.				

	business interest approved.						
5.8	What cross-referencing of the register takes place, i.e. with attendance management, disciplinary or contracts or records?	HoPSD	Directorate heads are required to sign of Business Interests in the initial instance. Having reviewed the application alongside the officers, current performance appraisal, and attendance record, prior to submission to PSD.				
5.9	Is the anti-corruption strategy aligned with organisational and individual conflicts of interest, e.g. OCG targets, contractors, etc?	HoPSD	PSD to review alignment of strategy as at Action 3.	30.6.12		To be included in forthcoming PSD Anti-Corruption Assessment (May/June2012). Completed August 2012.	
5.10	Has there been due consideration for suppliers or outsourcers to sign a 'restraint	DoCS	There are no restraint of trade clauses in operation by the City of London, however, there is				

	of trade clause' to prevent them employing (in any form) staff involved in the relevant procurement, due diligence or decision making process?		a due diligence process for each and every contract. Any member of staff of the Corporation of London, need to seek permission to work, or act for a third party, so City of London staff should not be able to influence .				
5.11	Have persons at risk of influence by contractors or suppliers been identified and mitigation actions implemented?	DoCS	As above ,staff are not normally allowed to work for a third party, without permission, if an immediate member of the procurement team family was a member of tendering contractor then there would be consideration to their appropriateness to remain within the team. All elected members				

			are obliged to inform the chairman of the relevant committee of an relationships in any matter bought before a committee. All City of London Corporation contracts go through a committee approval process.				
5.12	Has intellectual property been identified within the procurement process (and associated agreements) and have organisational protections been applied?	DoCS	The Corporation does ask for intellectual property rights to be identified and protected as a matter of course. If there were a need for them to be identified and so protected then this would happen along with any other consideration to protect to the City of London.				

**Section F: Professional Standards and Proactivity**

Self- assessment question		Action Owner	Actions to Deliver Target	Action Due Dates	Risks & Issues	Comments	Status (R/A/G)
6.1	Are the key elements of the SOCA and force strategic threat assessments effectively communicated to staff throughout the Force?	HoPSD	Disseminated to appropriate staff, however this is GPMS marked, and not generally distributed. The Force Strategic Assessment is about to be re-written. 9) HoPSD to review dissemination criteria.	31.7.12		This is currently being drafted, and will be circulated once complete. Drafted, and circulated to relevant staff.	
6.2	How widely promulgated and trusted are the reporting and support mechanisms for „whistle blowing?	HoPSD	PSD confidential is advertised on the intranet along with safecall and crimestoppers and there is evidence of use. PSD SOP for reporting outlines all avenues to report issues.				
6.3	Does the Force have adequate systems in place to capture, record and assess intelligence	HoPSD	PSD CCU utilise a stand alone system on a secure network, separate to the rest of PSD.				

	relating to integrity and corruption?						
6.4	Is there sufficient covert auditing capability within the anti-corruption unit and is this supported by adequate IT?	HoPSD	10) HoPSD to ensure all force systems can be accessed covertly by CCU.		PSD do not have access to all CoLP covert IT systems and therefore an audit or dip-sample is not possible.	A paper to ACPO will identify Force Systems currently inaccessible to CCU in terms of covert monitoring capability.	
6.5	What auditing is undertaken of employee expenses, mileage, overtime, phone and internet use?	HoPSD	These areas are subject to constant monitoring by the Counter Corruption Unit with enquiries made into any anomalies and a monthly report by the Director, PSD to the PSD ACPO Lead.				
6.6	Does the anti-corruption unit have the capability, capacity and experience to undertake reactive and proactive investigations and operations?	HoPSD	South East region MOU allows for the use of resources from other forces by CoLP (subject to availability). Collaborative opportunities are currently being reviewed in this				

			area with the BTP.				
6.7	Is there a requirement for collaborative or service level agreements to support investigations and operations	HoPSD	South East region MOU exists for CCU operations. Current discussions with the BTP if viable, would result in a Section 23 Agreement.				
6.8	What oversight/input do the professional standards department and anti-corruption unit have with regards to applications for additional employment, gifts and hospitality registers and procurement contracts?	HoPSD	All areas are subject to monthly audit by PSD, reported to ACPO lead, with the exception of Procurement, which is overseen by Procurement Working Group, chaired by DoCS, which scrutinises all force spends across a range of commodities, to ensure compliance with financial regulations.				
6.9	What mechanisms are in place to proactively						

	identify and address vulnerability at individual and force level?						
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<b>Section G: Governance and Oversight</b>								
<b>Self- assessment question</b>		<b>Action Owner</b>	<b>Actions to Deliver Target</b>	<b>Action Due Dates</b>	<b>Risks &amp; Issues</b>	<b>Comments</b>	<b>Status (R/A/G)</b>	
Page 38	7.1	How do the chief officer group and police authority demonstrate leadership in promoting the force values and integrity?	ACPO	ACPO PSD lead is responsible for oversight of all areas covered by this review, with the exception of procurement and adverse incidents are reported monthly through audit. There is a Police Committee sub group who approve all force contracts after legal counsel from City solicitors.				
	7.2	How is the ethos of integrity and values reflected in	HoPSD	There is an expectation through policy that staff will report Gifts,			This will be reflected in the new Media SOP and Policy with a line to link to relevant PSD policy/SOP.	



	policies, practices and communications?		Hospitalities, Business Interests, Media Contact etc, and those unreported, should be identified through proactive monitoring and audit, which staff are aware is undertaken by PSD.				
7.3	What mechanisms exist to ensure that the police authority and force jointly challenge integrity issues within the force?	HoPSD	Police Authority hold a quarterly Professional Standards and Complaints Sub Committee, where ACPO and head of PSD are required to report all outcomes of complaints and misconduct procedures. Chair of the Sub Committee also attends the Force Organisational Learning Forum, chaired by ACPO PSD lead.				
7.4	What is the role of the	HoPSD	To identify through overt or				

	Professional Standards Department in respect of the governance of integrity?		covert means, where integrity issues arise, and investigate cases and instigate conduct proceedings where necessary and appropriate. PSD are also responsible for the recording and management of all civil cases against the force.				
7.5	Does integrity form part of your performance management framework?	DoCS	The Local Policing Plan is jointly agreed by Police Authority and ACPO, and all performance measures reflect force priorities, which are disseminated through directorate and team action plans and individual PDR'S.				
7.6	How are policies relating to integrity reviewed to	HoPSD	With the exception of media contact and				

	ensure that they remain fit for purpose?		procurements, all areas subject to this review have clear SOP'S under the Professional Standards Policy. All force SOP'S are reviewed every 3 years, or when necessary in between, and are subject to scrutiny at Senior Management level.				
.7 Page 41	How are lessons learned and breaches of unacceptable behaviour communicated in your force?	HoPSD	Organisational Learning Forum is attended by senior staff from all directorates, as well as HR and finance representatives. These SPOCS are responsible for dissemination of lessons learned and monitoring within their directorates. The forum is chaired by PSD ACPO'S lead, and attended by				

			<p>Police Authority lead. Minutes are readily available on the Intranet, via PSD'S webpage.</p> <p>The outcome of all Misconduct Hearings are disseminated by Broadcast Message from ACPO.</p>				
7.8	<p>What audit and inspection processes exist in relation to integrity, and what level of independence exists within this regime?</p>	DoCS	<p>Oversight of entries in Gifts &amp; Hospitality Register conducted by ACPO (Assistant Commissioner) on a monthly basis.</p> <p>PSD audits/ dip sampling expenses Top 10 claimants.</p> <p>Organisation Learning Forum reports on learning outcomes from ETs/Tribunals/PS D etc which will</p>				

			include integrity issues  Risk Registers				
7.9	How do you ensure that integrity runs through your organisation? Is this reflected in recruitment, training and selection processes?	HoPSD	PSD input to various courses in training recruits etc, OLF and vetting.  PSD are required to highlight any conduct issues, prior to substantive promotion or postings of all staff within the organisation.				
7.10	What mechanisms exist in the management of risk? Do you use bespoke risk registers and dedicated risk managers?	Risk Manager	The CoLP has a dedicated Risk Manager who is responsible for overseeing the completion of the Force Risk Register, in addition to local directorate, and where necessary department Risk Registers.				
7.11	Does your	DoCS	Current CoL				

	meeting and committee structure support effective service delivery, scrutiny, audit and accountability?	Head of Strategy Performance and Review (HOSPR).	<p>Committee structure is fit for purpose – Police Committee has an overseeing/scrutiny/ challenge function</p> <p>There are also a number of sub committees</p> <p>Police Performance and Resource Management and Professional Standards and Complaints with this remit.</p> <p>There is a policy, which fully outlines the forces corporate framework for performance.</p>				
7.12	Is there coordination between organisational issues, policy development, training and cultural change which will	HoPSD	There is no central policy unit within the current force structure, reviewing force policy. The accountability for policy lies with the directorate	Ongoing.		OLF will assume responsibility for requesting compliance testing of policies where learning issues are identified.	

	<p>reduce opportunity for corruption?</p>		<p>heads. There is a gap in respect of compliance testing of policy, which should be addressed by exception through OLF. 11) HoPSD to ensure where organisational learning, regarding breach of policy is identified, OLF creates actions for compliance testing of relevant policy.</p>				
<p>7.13</p>	<p>What arrangements are in place to ensure an effective transition to the introduction of Police and Crime Commissioners ?</p>		<p>Not applicable to the CoLP.</p>				

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