

Professional Standards and Integrity Sub (Police) Committee

Date: FRIDAY, 1 DECEMBER 2017

Time: 11.00 am

Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members: Alderman Alison Gowman (Chairman)

Deputy Douglas Barrow (Ex-Officio Member)

Nicholas Bensted-Smith

Tijs Broeke (Common Council) Mia Campbell (External Member)

Deputy Richard Regan

Lucy Sandford (External Member)

Deputy James Thomson (Ex-Officio Member)

James Tumbridge (Common Council)

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Next Meeting: 5 March 2018 @ 14:30

Lunch will be served in Guildhall Club at 1PM NB: Part of this meeting could be the subject of audio or video recording

John Barradell
Town Clerk and Chief Executive

AGENDA

Part I - Public Agenda

- 1. **APOLOGIES**
- 2. DECLARATIONS BY MEMBERS OF PERSONAL OR PREJUDICIAL INTERESTS IN RESPECT OF ITEMS TO BE CONSIDERED AT THIS MEETING
- 3. MINUTES

To agree the public minutes of the last meeting, held on 22 September 2017

For Decision (Pages 1 - 4)

4. OUTSTANDING REFERENCES

Report of the Town Clerk

For Information (Pages 5 - 8)

5. INTEGRITY DASHBOARD AND CODE OF ETHICS UPDATE

Report of the Commissioner of Police

For Information (Pages 9 - 12)

6. Q2 INTEGRITY DASHBOARD

Report of the Commissioner of Police

For Information (Pages 13 - 16)

7. INTEGRITY DEVELOPMENT AND DELIVERY PLAN REPORT 2016-17 (NOV 17 UPDATE)

Report of the Commissioner of Police

For Information (Pages 17 - 38)

- 8. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT
- 9. **EXCLUSION OF THE PUBLIC**

MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of the Schedule 12A of the Local Government Act.

For Decision

10. **CONFIDENTIAL MINUTES**

To agree the confidential minutes of the last meeting, held on 22 September 2017.

For Decision (Pages 39 - 44)

11. CONFIDENTIAL OUTSTANDING REFERENCES

Report of the Town Clerk

For Information (Pages 45 - 46)

a) Q2 Statistical Information

Report of the Commissioner of Police

For Information (Pages 47 - 76)

12. CONDUCT AND COMPLAINT CASES

Report of the Commissioner of Police

a) Case to Answer, Upheld

For Information (Pages 77 - 88)

b) No Case to Answer, Not Upheld

For Information (Pages 89 - 124)

c) Local Resolution

For Information (Pages 125 - 136)

13. IPCC REPORTS BULLETIN

Report of the Commissioner of Police

For Information (Pages 137 - 152)

14. GLOSSARY OF TERMS

Report of the Commissioner of Police

For Information

15. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT WHILST THE PUBLIC ARE EXCLUDED

PROFESSIONAL STANDARDS AND INTEGRITY SUB (POLICE) COMMITTEE

Friday, 22 September 2017

Minutes of the meeting of the Professional Standards and Integrity Sub (Police) Committee held at the Guildhall EC2 at 1.45 pm

Present

Members:

Alderman Alison Gowman (Chairman)

Tijs Broeke

Lucy Sandford (External Member)
Deputy James Thomson (Ex-Officio

Member)

Officers:

George Fraser - Town Clerk's Department
Alex Orme - Town Clerk's Department

Richard Jeffrey - City Solicitor
Nirupa Gardner - Internal Audit

Stuart Phoenix - Head of Strategic Development, CoLP
Dermont Robinson - Director of Professional Standards, CoLP
Alistair Sutherland - Assistant Commissioner, CoLP

1. APOLOGIES

Apologies were received from Deputy Doug Barrow, Nicholas Bensted-Smith and James Tumbridge.

2. DECLARATIONS BY MEMBERS OF PERSONAL OR PREJUDICIAL INTERESTS IN RESPECT OF ITEMS TO BE CONSIDERED AT THIS MEETING

There were no declarations.

3. MINUTES

Members considered the public minutes from the last meeting, held on 5 June 2017.

RESOLVED – That the minutes be approved.

MATTERS ARISING

The Chairman welcomed new Member, Tijs Broeke, to his first meeting of the Sub-Committee.

The Chairman noted that the agenda packs had been printed in their entirety on blue paper, thus signifying confidential status. The Town Clerk explained that due to printing protocol prohibiting confidential papers from being bound with non-public or public papers, it had previously been advised to print packs purely on blue paper for the purpose of the meeting. The Chairman requested that

packs be printed separately in correct accordance with their visibility classification to ensure that the tradition of the City Corporation is maintained. The Town Clerk confirmed that all future agendas for the Sub-Committee would be printed and bound in separate packs as per her request. (1)

4. INTEGRITY DASHBOARD AND CODE OF ETHICS UPDATE

The Sub-Committee received a report of the Commissioner of Police providing Members with an update on the Integrity Dashboard and Code of Ethics issues.

The Head of Strategic Development explained that a full report illustrating the results from the recent Staff Survey will be published in the coming weeks. He explained that an initial report had been submitted to the Police Committee on 21 September. The Chairman requested that this be circulated to all Members of the Sub-Committee that do not sit on the Police Committee. (2)

The Head of Strategic Development explained that the Integrity Standards Board had considered the addition of 5 new dashboard indicators around sponsorship as a result of the new Standard Operating Procedures (SOP).

A Member asked if there were minutes available from the London Police Challenge Forum. The Head of Strategic Development confirmed that there were, and that these could be submitted to the next meeting agenda. (3)

In reference to paragraph 11 of the report, a Member asked for further explanation on how the Force was dealing with whistleblowing. The Assistant Commissioner explained that a "bad apple" system was in place, allowing for confidential reporting through an online portal. He also clarified that a lack of online reports logged did not necessarily mean that reports weren't being received via other means. The Chairman explained that the new ability to respond to anonymous reports with follow-up questions was very beneficial. The Director of Professional Standards explained that there were two systems in place, with the "bad apple" system active for 2-3 months at this point. He explained that there was a whistleblowing policy in place, and that there were now an increased number of non-anonymous reports being submitted to the Professional Standards Directorate. He explained that they were managing to raise awareness with other Forces, and that this was a positive step. He offered to report back to the Sub-Committee on this as required. The Deputy Chairman stated that it was useful to know that these were coming through.

The Head of Strategic Development explained that the next meeting of the London Police Challenge forum would take place on 5 December 2017, from 10:00-13:00. He agreed to circulate a note to remind members of this prior to the event. (4)

RESOLVED – That the report be received.

a) Integrity Dashboard - 2017/18 Q1

The Sub-Committee received a report of the Commissioner of Police providing the latest figures surrounding the Force Integrity Indicators.

RESOLVED – That the report be received.

b) Police Integrity Development and Delivery Plan Report 2016-17
The Sub-Committee received a report of the Commissioner of Police updating Members on the Police Integrity Development and Delivery Plan.

The Head of Strategic Development explained that a report of Crime Audits being looked into would be submitted to the following meeting. (5) The Chairman asked for clarification that this was independent of the Staff Survey report, and this was confirmed to be the case.

A Member asked for an explanation of the column headings "V1, V2 etc." within the report. The Head of Strategic Development explained that these were analogous to "Q1, Q2 etc.", and referred to the word "version" rather than "quarter". A Member asked for confirmation that this was aligned to the quarters of the financial year of the UK, commencing on 1 April, and this was confirmed to be the case.

Measure 1.9 – To ensure training on standards, values and leadership roles is available for all staff

The Chairman asked how the training was being monitored. The Head of Strategic Development confirmed that the courses were checked off as complete during the induction process.

Measure 1.10 – To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures

The Chairman asked if there was a deadline for completion of the review of all policies and procedures. The Head of Strategic Development explained that the report of policies that require updating would be considered next week at the meeting of the Performance & Resource Management Sub-Committee.

The Chairman noted that there was an error on the CoLP website that stated that referred to "Corporate pay 2015/16", when it should refer to "2016/17", and asked that it be corrected. (6)

A Member asked if the level of transparency provided by the CoLP regarding the publishing of Gifts & Hospitality was superceded by any other forces. They suggested that the Gifts & Hospitality report be published and made clearly visible on the CoLP website. Those present agreed that this would be beneficial. (7)

5. **QUESTIONS RELATING TO THE WORK OF THE SUB-COMMITTEE** There were no public questions.

6. **ANY OTHER BUSINESS THE CHAIRMAN CONSIDERS URGENT** There was no further public business.

7. EXCLUSION OF THE PUBLIC

RESOLVED - That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds

that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

Chairman

Contact Officer: George Fraser

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PROFESSIONAL STANDARDS & INTEGRITY SUB (POLICE) COMMITTEE 1 DECEMBER 2017

OUTSTANDING REFERENCES

No.	Meeting Date & Reference	Action	Owner	Status	
1.	22/09/17 Item 3 - Matters Arising	The Town Clerk confirmed that all future agendas for the Sub-Committee would be printed and bound in separate packs if required, to ensure that the paper colouring convention according to security marking is adhered to. UPDATE: The current agenda packs comprise of both public (white) and confidential (blue) agenda items. Discussion is currently	Town Clerk	ONGOING	
	Agenda Packs	underway with recently appointed Director of Professional Standards to confirm if confidential items can safely be downgraded to non-public (yellow). This decision would be made prior to the meeting in March 2018.			
2.	22/09/17 Item 4 - Integrity Dashboard & Code of Ethics Update Staff Survey Report	The Head of Strategic Development explained that a full report illustrating the results from the recent Staff Survey will be published in the coming weeks. He explained that an initial report had been submitted to the Police Committee on 21 September. The Chairman requested that this be circulated to all Members of the Sub-Committee that do not sit on the Police Committee.	Town Clerk	COMPLETE – Report Circulated to Members 12/10/17	
3.	22/09/17 Item 4 - Integrity Dashboard & Code of Ethics Update	A Member asked if there were minutes available from the London Police Challenge Forum. The Head of Strategic Development confirmed that there were, and that these could be submitted to the next meeting agenda.	CoLP	OUTSTANDING – Update received 16/11/17	
	London Police Challenge Forum Minutes	UPDATE : MPS representative advised that the minutes have not yet been signed off by Chief Superintendents, but anticipated they would be circulated before the end of November 2017.			

4.	22/09/17 Item 4 - Integrity Dashboard & Code of Ethics Update	The Head of Strategic Development explained that the next meeting of the London Police Challenge forum would take place on 5 December 2017, from 10:00-13:00. He agreed to circulate a note to remind members of this prior to the event.	CoLP	COMPLETE
	London Police Challenge Forum Date	UPDATE : Confirmed as 5 December 2017, 10:00-13:00 at the Wakefield Mess, Wood Street, Chaired by T/Cdr Gyford.		
5.	22/09/17 Item 4b - Police Integrity Development and Delivery Plan Report 2016-17 Report of Crime Audits	The Head of Strategic Development explained that a report of Crime Audits being looked into would be submitted to the following meeting. UPDATE: Details of this are to be included in the November 2017 update report.	CoLP	REPORT DUE NOVEMBER 2017
6.	22/09/17 Item 4b - Police Integrity Development and Delivery Plan Report 2016-17 Website Error	The Chairman noted that there was an error on the CoLP website that stated that referred to "Corporate pay 2015/16", when it should refer to "2016/17", and asked that it be corrected.	CoLP	COMPLETE
7.	22/09/17 Item 4b - Police Integrity Development and Delivery Plan Report 2016-17	The Gifts & Hospitality report to be published and made clearly visible on the CoLP website.	CoLP	OUTSTANDING
	Gifts & Hospitality report			

8.	05/06/17 Item 12 -	Commissioner to include Staff Survey indicators on future dashboard updates	CoLP	ONGOING -
	Integrity Dashboard & Code of Ethics update 01/03/17 Staff Survey Indicators on Dashboard	The Force received a high-level presentation from Durham University on 15th September with an indication that the final report would be received in Force at the end of September, beginning of October. Following receipt of the report, the Force will develop an action plan to address the identified areas of concern (D/Ch Supt I&I to lead). The report and action plan will inform potential measures for the dashboard.		Update received 16/11/17
Page 7		UPDATE : Indicators still to be agreed. Following receipt of the full report (which was late but has now been published in full on the force's intranet), Organisational Development has held a series of workshops to explore the findings with staff. The last of these workshops was the 7th November. An information report is being prepared for the next Grand Committee. An action plan is now being developed which will be submitted to the next SMB in December, following which it is intended to include a measure in the Integrity Action Plan.		

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Committee(s):	Date:
Professional Standards and Integrity Sub Committee	1st December 2017
Subject: Integrity Dashboard and Code of Ethics Update	Public
Report of:	
Commissioner of the City of London Police	For Information
Report author:	
Stuart Phoenix, Head of Strategic Development	

Summary

Integrity Standards Board and Dashboard:

The dashboard appended to this report (Appendix A) will be considered by the Integrity Standards Board on 30th November 2017; a verbal update will be provided to your Sub Committee.

Code of Ethics Update:

The last London Police Challenge Forum meeting took place on the 7th September 2017 at Metropolitan Police premises, the notes of that meeting are still awaited. The next meeting will take place on December 5th 2017 and is being hosted by the City of London Police.

The late receipt of the Force Staff Survey has impacted on the progress of a number of activities relating to the integrity agenda, including the review of the Integrity Development Plan and dashboard review.

A large number of crime audits have been completed over the course of the year; none have revealed evidence of unethical behaviour.

Her Majesty's Inspector of Constabulary and the Fire and Rescue Service's (HMICFRS) report on Legitimacy is not now due to be published until 8th December 2017.

Recommendation(s)

Members are asked to note the report.

Main Report

Background

1. Integrity is a key principle of the Police Code of Ethics, published in July 2014. Recognising this, the Force developed an integrity dashboard that brought

together a series of indicators across a broad range of activities associated with integrity. The dashboard indicates the extent to which the Force's workforce acts with integrity. It is attached for Members' information at Appendix A.

2. To complement the dashboard and ensure there is a programme of ongoing activities to embed the Police Code of Ethics, the Force developed a Code of Ethics action plan, which is also attached for Members' information at Appendix B.

Current Position

Integrity Standards Board and Dashboard

- 3. An Integrity Standards Board (ISB) was constituted to monitor the dashboard on a quarterly basis and to consider other issues relating to integrity. The Board is chaired by the Assistant Commissioner and is attended by the Chairman of your Sub Committee and a representative from the Town Clerk's department. At the time this report was prepared, the last board convened on Thursday, 7th September 2017. The next Board will be the day before your Sub Committee, Thursday 30th November 2017.
- 4. It follows therefore that the dashboard at Appendix A has not been considered by the Board and is presented here for information only. It should be possible to provide a verbal update regarding the dashboard to your Sub Committee, together with the usual overview of the meeting, which for the same reason cannot be included in this report.

Code of Ethics Update

- 5. The Metropolitan Police (MPS) hosted the last London Police Challenge Forum on 7th September 2017. The outcome of that meeting has not yet been published by the MPS, who administer the meeting. The outcome of the meeting hosted by the City of London Police in June was generally considered to be of limited use; this has been taken up with those facilitating the meetings for a more useful product to be generated. To that end, a meeting has been set up for Wednesday 22nd November to consider the way forward. Members might recall that it was a founding principle of the forum that it would publish useful guidance on ethical dilemmas considered.
- 6. The next meeting will be hosted by the City of London Police at Wood Street on 5th December 2017. It will be chaired by T/Cdr Gyford.
- 7. Although the Force launched an internal "raise an ethical dilemma" link on its website 3 months ago, to date there have not been any referrals made. The link will be re-publicised to encourage submissions.

Integrity Action Plan

- 8. The Integrity Action Plan attached at Appendix B is now complete for 2017, and with the exception of 2 areas marked AMBER, has been substantively achieved. The Plan was due to be reviewed prior to your Sub Committee, however, the late arrival of the staff survey results, which is fundamental to the review, has effectively pushed everything back by around 6 weeks. A series of workshops with staff has only just completed, which is feeding into the development of an action plan, led by the Chief Superintendent, Intelligence and Information Directorate.
- 9. Initial work between Strategic Development and Professional Standards to review the dashboard measures assessed the majority to be fit for purpose in terms of being indicators of organisational / personal integrity. As above, however, it is intended the staff survey results and resulting action plan will inform whether any additional or replacement measures are required.
- 10. A reviewed plan will be presented to the next Integrity Standards Board and your Sub Committee in the New Year.

Crime audits

- 11. The Force Crime and Incident Registrar (FCIR) conducts regular audits of Force compliance with Home Office Counting Rules (HOCR) and the National Crime and Incident Recording Standard (NCRS). Forces (note, not the City of London Police) have been criticised in the past for unethical crime recording and associated practices. Whilst the audits are primarily concerned with compliance, the FCIR also looks to see where results indicate unethical practices or circumstances that might be interpreted as unethical.
- 12. The audit reports are submitted to Performance Management Group and the Victim Code and Crime Working Group for oversight and action. The FCIR reports verbally to the Integrity Standards Board whether any of the audits reveal ethical or integrity-related issues. If such issues are identified, a written report is made.
- 13. Over the course of 2017, the following audits have been completed:
 - a. Rape
 - b. Sexual offences classification
 - c. Computer Aided Despatches (CADs) opened on violence/public order
 - d. CADs opened on other crimes
 - e. CADs closed on non-crime codes
 - f. Crime cancellations
 - g. Crime related incidents on UNIFI
 - h. Out of court disposals
 - i. Modern slavery
 - j. Annual data return crime flags (Hate crime)
 - k. Crime reclassification
 - I. Domestic Abuse
 - m. Victim satisfaction (ease of contact)

14. No issues relating to integrity have been identified by any of the audits.

PEEL Efficiency (Legitimacy) Reports 2017

- 15. Her Majesty's Inspector of Constabulary and the Fire and Rescue Service (HMICFRS) were due to report the findings of their PEEL (Legitimacy) inspections in early November 2017 at force and national levels. This would have provided sufficient time to submit the reports to your Sub Committee. However, HMICFRS have delayed publication of the reports until the 8th December 2017. As the reports are not yet in the public domain, they cannot be reported formally to your Sub Committee. The Force has had sight of the Draft City of London Legitimacy report for a review of factual accuracy, however, no draft of the national report has been shared with any force.
- 16. Following the publication of the inspection findings, a report will be submitted to your next Sub Committee.

Appendices

- Appendix A Integrity Dashboard
- Appendix B Integrity and Code of Ethics Development Plan

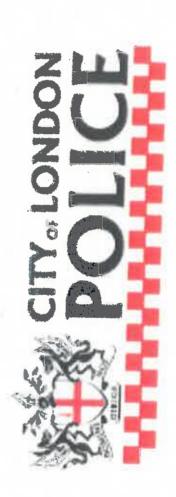
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NOT PROTECTIVELY MARKED CITY OF LONDON POLICE

DASHBOARD 2017/18 Quarter 2



Number of Grievances registered with HR 70133/14 2015/15 2015/15 CRT 1 CRT 2 CRT 3 CRT 4 Total The outcomes and learning are field back to Directorate hads and any organisational learning is disseminated to OLI: The current theme of grievances is around poor communication with the HRBY's are doubting at incapparating is disseminated to OLI: The current theme of grievances is around poor communication with the HRBY's are doubting at incapparating first learning are field back to Directorate hads and any organisational learning is disseminated to OLI: The current theme of grievances is around poor communication with the HRBY's are doubting the HRBY's are doubted with the second quarter. However, or a 2014/15 2015/16 2016/17 CRT 1 CRT 2 CRT 3 CRT 3 CRT 4 Total There were to new FT's rised within the second quarter. However, or a 2014/17 2015/16 2016/17 CRT 1 CRT 2 CRT 3 CRT 3 CRT 4 Total There were act completive scorded during CRT 2 Period and 47 allegatories (Park 1) CRT 2 CRT 3 CRT 3 CRT 4 Total There were 2 counties from completions against force 2 CRT 3 2015/16 2016/17 CRT 1 CRT 2 CRT 3 CRT 3 CRT 4 Total A Number of CMI cases which site the force 2015/14 2016/17 CRT 1 CRT 2 CRT 3				FORCE IN	FORCE INTEGRITY INDICATORS	OICATORS						
		Mumber	Indicator		Historic	Levels			Curre	int Levels 2	1017/18	
		1	Number of Grievances registered with HR	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
				_	*	4	13	8	3		-	9
			The outcomes and learning are fed back to Director	rate heads an	d any organi	sational lear	ning is disse	minated to	o OLF. The	current the	eme of grie	vances is
			around poor communication which the HRBP's are	looking at inc	orporating ir	n the upskilli	ng of line ma	anagers.				
		2	Number of Employment Tribunals that cite the	2013/14	2014/15	2015/16	2018/11	QTR 1	QTR 2	QTR 3	QTR 4	Total
			Force	0	2	0	54	0	0			0
			There were no new ET's raised within the second qu	uarter. Hower	ver, due to a	Supreme Co	urt Judgeme	int in Aug	ust 2017 w	hich took a	way the re	quirement
			for employees having to pay fees for submitting cla	ims there wil	potentially	be an increa	se in cases.					
		က	Number of registered complaints against Force	2013/14	2014/15	2015/16	21/9102	QTR 1	QTR 2	QTR 3	QTR 4	Total
			excluding Action Fraud	39	117	105	102	32	21			53
			There were 21 complaints recorded during the Q2 p	period and 47	allegations (both excl Ac	tion Fraud).	Of these	17, the Top	5 Nationa	Allegation	
			categories accounted for:- Other assault x 4; Oppre	ssive Conduct	:/Harassmen	t x 1; Unlaw	ful/unneces	sary arrest	t or detent	ion x 1; Otl	her neglect	or failure
		4	Number of Civil cases which site the Force	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
				14	24	23	11	9	2			co
				isclosed letter	r - inaccurate	information	1; 1 x Lost de	iving licen	ice re forei	gn nationa		
		TO.	Investigations resulting from monitoring of	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
			irregular mobile phone use	0	0	0	Ţ	0	0			0
			No investigations arising from monitoring irregular	mobile phon	e usage durir	1g Q2						
		9		2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
			use/transitions involving Corporate credit cards	0	€1	2	61	0	0			0
Number of PSD investigations principally arising 2013/14 2014/15 2015/16 2016/13 QTR 1 QTR 2 QTR 3 QTR 4 from complaints on use of Force forms now being recorded via Pronto - They are not being used for the purposes of integrity monitoring by CCU Number of monitoring assessments undertaken 2013/14 2014/15 2015/16 2016/17 QTR 1 QTR 2 QTR 3 QTR 4 around expenses claims 1 investigation relating to Overtime and Expenses claims Number of business Interest Investigations 2013/14 2014/15 2015/16 2016/17 QTR 1 QTR 2 QTR 3 QTR 4 undertaken for police officers 1 a 3 1 6 0 0 0	Number of PSD investigations principally arising from complaints on use of Force Use of Force Forms now being recorded via Pronto Number of monitoring assessments undertaken around expenses claims 1 investigation relating to Overtime and Expenses undertaken for police officers Undertaken for police officers There was 1 Business Interest recorded in Q2 for Pa		There were 21 separate monitoring exercises during	ig Q1 (new no	minals, SIM	nominals an	d ad hoc che	cks). Non	e were hig	hlighted fo	r further a	ssessment.
trom complaints on use of Force of Force forms now being recorded via Pronto - They are not being used for the purposes of integrity monitoring by CCU Number of monitoring assessments undertaken 2013/14 2014/15 2015/16 2016/17 QTR 1 QTR 2 QTR 3 QTR 4 around expenses claims 0 1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Use of Force Forms now being recorded via Pronto Number of monitoring assessments undertaken around expenses claims 1 investigation relating to Overtime and Expenses Number of business Interest Investigations undertaken for police officers There was 1 Business Interest recorded in Q2 for Pe	7	Number of PSD investigations principally arising	2013/14	5014/12	2015/16	21/9102	QTR 1	QTR 2	QTR 3	QTR 4	Total
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around expenses claims 0 1	1 investigation relating to Overtime and Expenses claim Number of business Interest Investigations undertaken for police officers There was 1. Business Interest recorded in Q2 for Police Officers - 1 x Director of a Review Website	00	Number of monitoring assessments undertaken	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
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Number of business Interest Investigations 2013/14 2014/15 2015/16 2016/17 QTR 1 QTR 2 QTR 3 QTR 4 undertaken for police officers 1 3 1 6 0 0	Number of business Interest Investigations 2013/14 2014/15 2015/16 2016/17 undertaken for police officers 1 3 1 6 There was 1 Business Interest recorded in Q2 for Police Officers - 1 x Director of a Review Website		1 investigation relating to Overtime and Expenses or	claim								
1 3 1 6 0	Police Officers - 1 x Director of a Review Website	6	Number of business Interest Investigations	2013/14	2014/15	2012/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
			undertaken for police officers	त्न	€ .	뻍	9	0	0			0

		FORCE IN	FORCE INTEGRITY INDICATORS	DICATORS						
Number	Indicator		Historic Levels	lovole					-	
10	Number of business Interest Investigations	2013/14	2014/1E	2015 /40	1000		Curr	Current Levels 2017/18	2017/18	
	undertaken for support staff		CT /htor	91/5102	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
	d in-02	Civilian State	Dr. Buene	o	0	0	-			F
11	Number of unredictored Colombia	Common state - At Property Kental and 1 x sports instructor	ex Property	Kental and	1 x sports ir	Istructor				
	detected by Corp Comms and reported to PCD	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
	1 investigation during O2	0	2	0	L)	0	1			-
12										
	result of PNC/PND dip sampling	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
	No investigations during Q2		₩.	. 2	0	0	0			0
13	Number of monitoring exercises condinged on	20000								
	gifts and hospitality register entries	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	5	ന	60	-	-			
	Here were 5 separate monitoring exercises during Q2. No investigations undertaken researched in the control of	Q2. No inves	tigations und	lertaken re	100 officer					1
	Were showing as accepted a declined and a fine of download to the time of download and were showing as accepted a declined and a fine of download and	7 – There wer	e 55 Gifts an	d Hospitality	submission	1s recorde	during Q	2 - at the t	issessment	relevant
	Directorates. Of the 55 entries, 17 entries, 13 entries, 18 related to NPCC, 16 x ECD, and the remainder spread across the other	Of the 55 ent	ries, 18 relat	ed to NPCC,	16 x ECD, ar	nd the rem	ainder spr	ead across	the other	600
14	Number of management issues arising from		a Line Mana	ger Approva	l nor a Dire	ctorate He	nd Decision	_		
	vetting of the workforce	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	OTR 4	Total
	During the period of O2 there were no Vetting			0	0	0	0			0
	mainly due to honesty/integrity or financial concerns. The mainly due to honesty/integrity or financial concerns applicants	sals arising tro	m current e	nployees be	ing re-vetti	ng. There v	rere 11 ref	usals from	external at	plicants
	completed, and 77 still pending at the close of the quarter.	is, friere wer luarter.	e a total of 2	62 new vett	ing applicat	ions receiv	ed during	Q2, with 2(55 applicati	ons being
15	Number of procurement purchases assessed by	2013/14	2014/4E	2002 102						
	PSD for investigation	17/500	5014/13	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
	2 investigations relating to Proguement issues	3	0	7		н	2			~
16	Number of nogitive regular from social									
	cause random drug testing with	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	OTR 4	Total
	There were no bositive results with the total	A Company		0	0	0	0			
,		aken in July.								
17	Identified breaches of the Donations and	2013/14	2014/15	2015/16	2016/17	OTTO 4				
	sponsorship SOP				1000	T W T	ZIK Z	QTR3	QTR 4	Total
	This was a new measure approved by the Integrity Standards Board in September.	tandards Boa	rd in Septem	ber.	41					•

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POLICE INTEGRITY DEVELOPMENT

and DELIVERY PLAN REPORT 2016-17

November 2017 update

CITY of LONDON

INTRODUCTION

This development and delivery plan has been produced to ensure that the City of London Police continues to discharge its obligations introduced by the ACPO Police Integrity Maturity Model, supports the continued embedding of the national Police Code of Ethics and implements improvements to ethics and integrity in the Force in line with national requirements and best practice.

PLAN SUMMARY

	Irah	Traffic Light Tracker	cker	
Version 1	Version 2	Version 3	Version 4	Version 5
GREEN	GREEN	GREEN	GREEN	GREEN
GREEN	GREEN	GREEN	GREEN	GREEN
GREEN	GREEN	GREEN	GREEN	GREEN
GREEN	GREEN	GREEN	GREEN	GREEN
AMBER	GREEN	GREEN	GREEN	GREEN
GREEN	GREEN	GREEN	GREEN	GREEN
AMBER	GREEN	GREEN	GREEN	GREEN
GREEN	GREEN	GREEN	GREEN	GREEN
GREEN	GREEN	GREEN	GREEN	GREEN
GREEN	GREEN	GREEN	GREEN	GREEN
MBE NABE	7 7 7 8 7 8 7 7 7		GREEN GREEN GREEN GREEN GREEN GREEN	GREEN

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2 Davalonment Meseringe		Traffi	raffic Light Tracker	ker	
A Development measures	Version 1	Version 2	Version 3	Version 4	Version 5
2.1 Maintain awareness of integrity obligations amongst workforce	GREEN	GREEN	GREEN	GREEN	GREEN
2.2 Reinforce the 'tone from the top' from chief officers	AMBER	AMBER	GREEN	GREEN	GREEN
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	WHITE	WHITE	WHITE	AMBER	AMBER
2.4 Ensure all relevant public consultations and internal surveys contain integrity questions	AMBER	AMBER	GREEN	GREEN	GREEN
2.5 Ensure the Force public website will contain clear and easily accessible information on	AMBER	AMBER	AMBER	AMBER	AMBER
יוויפפווו// ומוזיסמות בוויי			Madeducad	District Control	The state of the s
2.6 Improve the emicacy of messaging around ethics and the Code	AMBER	AMBER	GREEN	GREEN	GREEN
2.7 Embed the principles of the Code of Ethics into corporate decision making	AMBER	AMBER	GREEN	GREEN	GREEN
2.8 Review key Force planning processes (financial, business planning and risk) to incorporate consideration	AMBED	AMBED	AMBED	Madel	Name of
of the Police Code of Ethics	AMBER	AMDER	AMDEN	GREEN	ONEEN

PERFORMANCE REPORT

Traffic Light Colour	Definition of measure achievement
GREEN	Aim is achieved in date and to level set.
AWBER	Current projections indicate this measure will not be met unless this additional action taken
RED	No progress on measure or deadline/level has not been met and it is unlikely will be met.

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Target Report Checklist	 Current level of achievement 	 Dates for work completed 	 Dates future work will be completed by (milestones) 	 Reasons for current achievement level 	 Any risks that have been realised 	 Work undertaken to manage realised risk 	 Work to be undertaken to manage risk against target 	 Impact of other indicators on this work area 	 A statement from owner about whether they think the 	measure will or will not be achieved by the due date	based on the information provided above
			ones)				target	,	nink the	date	}
								,	- 0	1	

	1. COMMITMENT CRITERIA
MEASURE	1.1. Force has issued a statement committing to support and embed the Police Code of Ethics
OWNER	Head of Strategic Development
AIM/RATIONALE	The Commissioner will make a statement committing the Force to supporting and embedding the Police Code of Ethics and set out the framework for the management of integrity within the organisation
DUE DATE	December 2016
MEASUREMENT	Record date and document statement is issued within and to be reviewed annually
TRAFFIC LIGHT CRITERIA	Green: Statement Issued. Amber: Statement being drafted. Red: Statement not issued or out of date by more than three months
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
The Force's commitment to	The Force's commitment to the Police Code of Ethics is included prominently in all Force strategic level publications (Policing Plan, Force-level strategies and Policies).
For the 2017 Policing Plan, this has	For the 2017 Policing Plan, this has been developed to link the Code's principles more explicitly to the Force values of Integrity, Fairness and Professionalism. It also

includes reference to the internal processes to manage integrity within the organisation, i.e. the work of the Integrity Standards Board and scrutiny function of the Police Professional Standards and Integrity Sub Committee.

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A statement has also been included in the draft Force Annual Report.

TRAFFIC LIGHT		MEASURE OWNER AIM/RATIONALE MEASUREMENT DUE DATE TRAFFIC LIGHT CRITERIA TRAFFIC LIGHT
		CURRENT POSITION
A STATE OF THE PARTY OF THE PAR	Green: Plan exists Amber: Plan	MAPPIC LIGHT CRITERIA
Green: Plan exists Amber: Plan		DACETO LICITA COLUMNIA
Green: Plan exists Amber: Plan	December 2016	JE DATE
December 2016 Green: Plan exists Amber: Plan	Alan lend of the control of the cont	
December 2016 Green: Plan exists Amber: Plan	Existence of a plan which is reported to ISR guarteche	EASUREMENT
Existence of a plan which is rep December 2016 Green: Plan exists Amber: Plan	routinely to the Integrity Standards Board and Police Professional Standards and Integrity Sub Committee	M/RATIONALE
	To ansura work and the second	
	Head of Strategic Development	WNER
	Control of the contro	
	1.2 To maintain the Force Integrity Delivery Plan	EASURE
	1. COMMITMENT CRITERIA	

This plan was accepted by the ISB at its meeting on the 14th November 2016 and is being reported to each Integrity Standards Board and Professional Standards

November 2017 update – this is the final version of this plan for 2017 and will be revised for 2018 in line with the Integrity review and Force Integrity Strategy

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MEASURE	1.3 To maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force
OWNER	Head of Strategic Development
AIM/RATIONALE	To monitor activities relating to workforce and organisational integrity and drive activity with regard to integrity and transparency.
MEASUREMENT	Group exists, meets regularly and provides reports to the Professional Standards and Integrity Sub Committee
DUE DATE	November 2016
TRAFFIC LIGHT CRITERIA	Green: Group exists and meets regularly. Amber: Group exists but has not met for over 3 months. Red: Group doesn't exist or has not met for 6 months
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
The Integrity Standards Boar Department and Police Com	The Integrity Standards Board is now established; it is chaired by the Assistant Commissioner, attended by all directorates and representatives from the Town Cierk's Department and Police Committee. The meetings are quarterly and minuted.
Meetings during 2017:	
15 th March 2017.	
10 th May 2017.	
7th September 2017.	
30th November 2017	

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	1. COMMITMENT CONTENTS
MEASURE	1.4 To maintain Directorate Single Points of Contact (spoctate land)
OWNER	Directorate Heads (Head of Strategic Development to coordinate)
AIM/RATIONALE	To ensure Directorates are fully linked into integrity monitoring and activities that support the continued development of integrity within the Force.
MEASUREMENT	Directorate SPOCs exist and attend Integrity Standards Roard (rep.)
DUE DATE	November 2016
TRAFFIC LIGHT CRITERIA	Green: Directorate representation exists and attends ISB Amber: Directorate SPOCs exist but Directorates have not been represented at
TRAFFIC LIGHT	GREEN GREEN
CURRENT POSITION	

Directorate SPOCs exist for all directorates and are written into iSBs terms of reference. If the SPOC cannot attend ISB, they are required to arrange suitable representation at an appropriate level. All Directorates now have SPOCs.

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	1. COMMITMENT CRITERIA
MEASURE	1.5 To have defined the Force approach to corruption within appropriate Standard Operating Procedures (SOPs) and supporting statements
OWNER	Head of Professional Standards
AIM/RATIONALE	To ensure the Force approach to corruption is clearly documented and communicated to all staff and the public, supporting a culture of confidence within the Force in reporting suspected corruption and challenging behaviour and transparency
MEASUREMENT	Relevant SOPs (investigation and sanctions) detail Force approach to corruption and Commissioner has issued a statement as part of the Force's commitment to the ACPO (Association Of Chief Police Officers, now the National Police Chiefs Council) Police Integrity Model detailing the zero tolerance approach
- DUE DATE	December 2016
TRAFFIC LIGHT CRITERIA	Green: Position articulated and published. Amber: Process in development Red: No process or past the due by date by 3 months or more

The Force has a robust approach to counter corruption. This message has been communicated through a variety of methods, including intranet articles and workshops. There is a current anti-corruption SOP and Control Strategy. Safecall provides a secure and anonymous reporting system where the workforce can report any concerns, PSD is specifically feeding into the strategic processes to identify (and thereafter manage) threat, risk and harm, and lincludes counter corruption amongst other PSDrelated issues.

which has recently (February) been reinforced by intranet articles.

GREEN

CURRENT POSITION

Page 24

TRAFFIC LIGHT

A quarterly Professionalism newsletter has been and launched and includes articles around raising awareness of corruption as well as promoting positive, acceptable behaviours.

	1. COMMITMENT CRITERIA
MEASURE	1.6 To have established a process for internally and externally commissions.
OWNER	Director of Professional Standards
AIM/RATIONALE	To support the transparency, facilitate organisational learning and provide confidence that the force is openly addressing issues relating to corruption, integrity and misconduct
MEASUREMENT	Process established and maintained
DUE DATE	December 2016
TRAFFIC LIGHT CRITERIA	Green: Process established and being used. Amber: Process established but not being consistently used Red: No process or process routinely not used
TRAFFIC LIGHT	
CURRENT POSITION	

There is a process in place to publish the outcomes of hearings internally in sufficient detail to identify organisational learning, The results of misconduct hearings that are held in n public are also published on the public website; the latest addition was included in October 2017, with details of hearings going back to 2014.

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	1. COMMITMENT CRITERIA
MEASURE	1.7 To have established a process to support the Force's participation in the London Panel Challenge Forum (LPCF) (Ethics Associates)
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure the Force is fully engaged in the regional tri-force ethics challenge panel, promoting organisational learning and providing support to officers and staff in ethical decision making.
MEASUREMENT	Process in place and being used.
DUE DATE	March 2017
TRAFFIC LIGHT CRITERIA	Green: Process in place and being used. Amber; Process in development. Red: Process in place but not being used or no process in existence past due date
TRAFFIC LIGHT	GREEN

The formal launch of the London Panel Challenge Forum took place on 15th December 2016. The milestones are as below:

- Identify ethics associates delivered the Force has identified a cadre of 19 volunteer ethics associates (EAs) and advised the MPS and BTP of names. All have had background checks conducted re suitability. **⊢**i
- LPCF launched complete launched on 15th December 2016.
- 2017). The first internal meeting took place on 10th February where the process to submit and consider ethical issues was agreed. An intranet site is now being Following the launch, each force to establish internal process for triaging ethical issues by the EAs for consideration at the following quarterly panel (by March developed so that people can raise issues online (anonymously if preferred). The site will also be used to provide feedback,
- First panel took place in March 2017. CoLP hosted one of the second panels on 13th June, chaired by T/Cdr Ops & Security. Web-based reporting mechanism launched 1st week of May 2017 (no referrals yet received (November 2017)).
- 5. Last panel was hosted by the MPS on 7th September.
- Next panel to be hosted by the City of London Police 5th December 2017.

CURRENT POSITION

MEASURE 1.8 To have appointed a chief officer lead on Integrity and ensure their active involvement in the oversight of the Integrity plan OWNER Head of Strategic Development AIM/RATIONALE To ensure chief officer ownership and oversight of ethical and integrity issues within Force MEASUREMENT Chief officer lead appointed DUE BY November 2016 TRAFFIC LIGHT CRITERIA Green: Chief officer lead appointed and active Amber: Chief Officer lead appointed but not active in role Red: No chief officer lead.
--

Learning Forum, the Crime Data Integrity Oversight Board and lead on the associated area of Professional Standards. They are held to account by the Commissioner, the The Assistant Commissioner is the Chief Officer lead for integrity matters in force. In addition to chairing the Integrity Standards Board, they also chair the Organisational Grand Committee and the Professional Standards and Integrity Sub Commitee.

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	1. COMMITMENT CRITERIA
MEASURE	1.9 To ensure training on standards, values and leadership ethics is available for all staff
OWNER	Director of Human Resources
AIM/RATIONALE	To ensure staff are supported in their duty to uphold the Force's integrity standards
MEASUREMENT	Our recruitment and promotion processes will contain references to how integrity standards will be used as part of the assessment criteria for recruitment of new officers within the Force and for promotion of existing officers
DUE DATE	November 2016
TRAFFIC LIGHT CRITERIA	Green: Training courses are fully available within a rolling yearly programme. Amber: Training courses are still in development. Red: No training courses are available.
TRAFFIC LIGHT	GREEN

CURRENT POSITION

Page 28

Information on standards, values and leadership is available to all staff on the intranet.

All courses, Inspectors, Sergeants, Custody, Personal Safety Trainers etc provide advice and guidance on standards and integrity.

A major aspect of the Probationer programme is ensuring students uphold the force integrity standards, not only delivered by Learning & Development trainers but also Professional Standards Department.

Specials initial courses receive input on standards and integrity.

All training courses have been reviewed to ensure they incorporate the national College of Policing Code of Ethics. The Code of Ethics now also forms a discrete element of induction training, which includes written information and face to face presentations.

	1. COMMITMENT CRITERIA
MEASURE	1.10 To adopt Authorised Professional Practice (APP) and national guidance for Excessional
OWNER	Directorate Heads (co-ordinated by Head of Strategic Development)
AIM/RATIONALE	To ensure the Force complies with national standards with regard to policies and Standard Operating Procedures
MEASUREMENT	Strategic Development will maintain a watching brief on published App +
DUE DATE	November 2016
TRAFFIC LIGHT CRITERIA	Green: APP adopted or force position reviewed against APP Ambor. APR in the state of the position reviewed against APP Ambor.
TRAFFIC LIGHT	GREEN GREEN
CURRENT POSITION	

When Authorised Professional Practice (APP) was introduced by the College of Policing, the Force committed to adopt the APP in full where that could be done. Where full adoption could not take place (due to City-specific circumstances), Policy owners were required to review force procedures against the APP to ensure there was no conflict and that force processes reflect national best practice. This has been done for all currently published APP and is up to date (as at September 2017).

hospitality, expenses, use of telephones/IT systems, sponsorship etc.). Strategic Development checks the College of Policing APP site monthly to identify any revised or APP relates principally to operational processes and there is currently very limited APP that relates to those areas that most impacts on integrity (e.g. gifts and new APP to ensure it is considered by the Force. Any such identified APP will be reported as part of this action plan.

	2. Development Measures
MEASURE	2.1 Maintain awareness of integrity obligations amongst workforce
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure that integrity remains in the forefront of people's minds
MEASUREMENT	HoSD to provide ISB with details of integrity-related activities and evidence of publication.
DUE BY	QUARTERLY UPDATES to ISB
TRAFFIC LIGHT CRITERIA	Green: Integrity related activities undertaken and articles published Amber: Statement published with strategy under development. Red: No integrity related activity undertaken.
TRAFFIC LIGHT	GREEN

with an article called 'The only way is Ethics' and is being supported by an article developed by Organisational Development on the links between ethical behaviours and To complement the Professional Standards-related Communications month that ran in October 2016, February was designated 'Ethics' month. The month was launched leadership. Articles are also due to be published during the month focussing on staff members who have volunteered to be ethics associate. Page 30

CURRENT POSITION

The web-based reporting mechanism has been launched, together with the Professionalism newsletter, which is published quarterly.

	2. Development Measures
MEASURE	2.2 Reinforce the 'tone from the top' from chief officers
OWNER	Director of Professional Standards/Head of Strategic Davidonment
AIM/RATIONALE	The workshop held in Qtr 3 of 2016-17 highlighted the continued need for the chief officer team to lead by example and set the tone from the top. This presents an opportunity for the Senior Leadership Team to consider how they do business and how they can 'fly the flag' for integrity
MEASUREMENT	The Senior Leadership Team (SLT) to publicise to the Force its planned and a serior Leadership Team (SLT) to publicise to the Force its planned and a serior
DUE BY	March 2017
TRAFFIC LIGHT CRITERIA	Green: Event held and implementation plan developed and being delivered; AMBER EVENT held, implementation plan still in
TRAFFIC LIGHT	GREEN
CURRENT POSITION	

An event is planned for January 2016 with the SLT where this will be considered. Following that event and any decisions made, this will be reported more fully to the ISB together with progress against actions to be taken. As at January 2017 the event had not taken place. It is scheduled to be addressed at the Senior Leadership Meeting

messaging from the SLT have also reinforced the importance of professional standards and integrity (an example is the AC message regarding acceptable boundaries of behaviour with regard to abuse of position). The Staff Survey, which has now been launched will assist in assessing what additional future action will be necessary to May 2017 update: This action has now been addressed by the Integrity Strategy, which explicitly references chief officers leading by example. Recent blogs and

September 2017 update: It is anticipated that the results from the Staff Survey, once known and published, will influence activity for this indicator. (Results to be delivered to the September meeting of the Senior Leadership Team).

which has been published in full on the Force's intranet, Organisational Development have held a series of workshops with staff over a 2 week period to focus on areas where improvements can be made. The results of those workshops are currently being written up and feeding into an action plan which is due to be presented to SMB November 2017 update: The results of the staff survey were delivered late to the Force (October 2017) which has hampered progress. Since recelving the full report, In December. An information report is also being developed for Police Committee (Grand). Strategic Development will liaise with those developing the action plan to identify where (a) it can be used to inform the revised version of this Action Plan, and (b) whether any indicators can be incorporated into the dashboard.

	2 Development Measures
MEASURE	2.3 Conduct an annual review of the Force integrity programme and implement identified improvements
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure the Force continues to develop its approach to integrity and has plans to embed best practice.
MEASUREMENT	Review completed and reported to ISB
DUE BY	September 2017
TRAFFIC LIGHT CRITERIA	Green: Review complete and action plan amended Amber: review complete but action plan unamended or review overdue by 1-3 months Red: Review overdue by 3 months or more with unamended action plan.
TRAFFICLIGHT	AMBER
CURRENT POSITION	

September update: Work has commenced to review the Integrity programme (e.g. initial meetings held re measures/indicators and development plan mapping onto the developed to address the findings, including the integrity-related issues. It is anticipated this will be completed during October 2017. As the due by date for this indicator Integrity Strategy), however, a significant element of the review is dependent on the results of the Staff Survey, which as at August 2017 have not been received by the Force. They are due to be presented to the Senior Leadership Team at their September meeting. Following publication of the results, a programme of work will be could not be met fully, it is graded as AMBER.

Page 32

November update: As indicated above, the Staff Survey is the greatest input to review this plan, which unfortunately was not received by the Force until October, almost information report is also being developed for Police Committee (Grand). Strategic Development will liaise with those developing the action plan to identify where (a) it a month later than expected. Organisational Development have held a series of workshops with staff over a 2 week period to focus on areas where improvements can be made. The results of those workshops are currently being written up and feeding into an action plan which is due to be presented to SMB in December. An can be used to inform the revised version of this Action Plan, and (b) whether any indicators can be incorporated into the dashboard.

	2 Development Measures
MEASURE	2.4 Conduct a full staff survey and ensure that the survey addresses integrity.
OWNER	HR Director
AIM/RATIONALE	To benchmark the current position with respect to the workforce's view of integrity within the organisation. The results of the survey will also inform the review of the action plan going forward.
MEASUREMENT	Force will have an independent committee established with a defined mosting
DUE BY	May 2017
TRAFFIC LIGHT CRITERIA	Green: Survey complete, results published and action plan produced. Amber: Survey completed by the due date but results unpublished
TRAFFIC LIGHT	GREEN GREEN
CURRENT POSITION	

The last Staff Survey was completed in 2014. Responsibility for conducting the Staff Survey was given to HR by the AC in October 2016. The survey is currently at the scoping /planning stage, which includes looking at other forces' surveys that have been highlighted by HMIC as being good examples of their kind.

Page 33

Following a benchmarking visit to Durham (who had been graded 'outstanding' in this area), the Force is in the final stages of commissioning the University of Durham to conduct the staff survey. Ethical considerations have been built into their survey and is considered best practice by HMIC. Following the survey being conducted, Organisational Development have set up dates for workshops to work through with staff the issues raised by the survey.

May 2017 update. The survey launched on 28th April 2017. It will run for 4 weeks, then following a break of 2 weeks, it will run for another 2 weeks. There is a significant emphasis in the survey on individual and organisational ethical behaviour.

September 2017 update – The survey (which included a significant element relating to integrity) has been completed. Results are due to be delivered to the Senior

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	2 Development Measures
MEASURE	2.5 Ensure the Force public website will contain clear and easily accessible information on integrity/transparency
OWNER	Head of PSD
AIM/RATIONALE	To support the national transparency agenda regarding the publication of chief officer expenses, salaries, business interests and gifts and hospitality.
MEASUREMENT	Information published and current
DUE BY	March 2017 (with regard to the future developments)
TRAFFIC LIGHT CRITERIA	Green: Information published and current; Amber: Information published by out of date by 1-3 months; Red: Information not published or out of date by more than 3 months.
TRAFFIC LIGHT	AMBER
CURRENT POSITION	

The Force currently publishes registers relating to chief officer expenses, salaries and gifts and hospitality. The plan is to enhance the current arrangements so that the gifts and hospitality register includes directorates and is more accessible/understandable.

Page 34

The website was checked on 15th November. Expenses and Chief Officer pay were both up to date. Gifts and Hospitality were one quarter behind, hence the AMBER grading.

2 Development Measuras	2.6 Improve the efficacy of messaging around ethics and the Code	Corporate Communications Director	To workshop conducted in Qtr 3 highlighted that the force is suffering from 'message fatigue' and that new/innovative ways of conveying messages is required.	Different forms of messaging being used; improvement to be identified through an ex-	March 2017 (with regard to proposals for implementation)	Green: Proposal made and being implemented. Amber: Proposals made but not yet implemented Red: No proposals made by the due date.	GREEN	
	MEASURE	OWNER	AIM/RATIONALE	MEASUREMENT	DUE BY	TRAFFIC LIGHT CRITERIA	TRAFFIC LIGHT	CURRENT POSITION

communication. A meeting took place between the Head of Strategic Development and the Corporate Communications Director in early December 2016 to explore how Corporate Communications has recently proposed a new internal and external communications strategy, which looks at a variety of different approaches to effective the new approaches can be used to promote integrity and ethical behaviour.

Page 35

Force electronic screens in corridors and canteens. Material will also be incorporated into the 'Force cascade' (a process that encourages face to face communication of The 'Ethics' themed month was a direct result of that meeting and whilst that principally still uses the intranet site, it will be complemented by screen messages on

The Professionalism Newsletter which has launched will further complement the messaging.

Corporate Communications have developed and distributed 'desk carousels' which display easily understood and direct messaging around Force vision and values, the

	2 Development Measures
MEASURE	2.7 Embed the principles of the Code of Ethics into corporate decision making
OWNER	Head of Strategic Development
AIM/RATIONALE	The aim of this measure is to evidence consideration of the Code of Ethics' principles in corporate decision making.
MEASUREMENT	Amendments made to standard report templates/impact assessments to incorporate the principles of the Code of Ethics
DUE BY	December 2016
TRAFFIC LIGHT CRITERIA	Green: Amendments made to all Force standard report templates. Amber: Amendment proposals being developed. Red: No amendments made by due date.
TRAFFIC LIGHT	GREEN

decision required is likely to impact (positively or negatively) on the 9 principles of the Code of Ethics. Each template contains simple guidance to assist report authors to consider whether their report has such impact. The aim of this is to highlight good practice as well as mitigate any unintended adverse impact on integrity/transparency. May 2017 Update: All strategic board templates have been amended to include a section that asks if any option cited, proposal made, recommendation made or

CURRENT POSITION

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A strap line "Supporting the Code of Ethics through the Force values of integrity, professionalism and fairness" has also been included below the Force crest to re-inforce-

The effectiveness of this approach will be assessed as part of the annual review of this development plan.

	2 Development Measures
MEASURE	2.8 Review key Force planning processes (financial, business planning and risk) to incorporate consideration of the Police Code of Ethics
OWNER	Head of Governance and Assurance (HoGA)
AIM/RATIONALE	The aim of this measure is to assess opportunities to design integrity into core planning processes that are performed throughout the year
MEASUREMENT	Review complete and amendments made (where possible) to risk and planning appropriate to the series of the series and amendments made (where possible) to risk and planning appropriate to the series of the series and the series of the series
DUEBY	April 2017
TRAFFIC LIGHT CRITERIA	Green: Review complete and amendments made (where possible) to risk and planning processes. Amber: Review ongoing. Red: Review not complete by due date and no amendments made to a second part of the complete by due date and no amendments made to a second part of the complete by due date and no amendments made to a second part of the complete by due date and no amendments made to a second part of the complete by due date and no amendments made to a second part of the complete by due date and no amendments made to a second part of the complete by due date and no amendments made to a second part of the complete by due date and no amendments made to a second part of the complete by due date and no amendments made to a second part of the complete by due date and no amendments made to a second part of the complete by due date and no amendments made to a second part of the complete by due date and no amendments made to a second part of the complete by due date and no amendments made to a second part of the complete by due to a second par
TRAFFIC LIGHT	GREEN
CURRENT POSITION	

September 2017 Update.

Head of Governance and Assurance reviews the risk and planning regimes annually. For 2016/17 that review included consideration of how both processes might better support the Force's Integrity agenda through consideration of the Code of Ethics. With Force templates now including a section prompting consideration of the Code (see below), there is not any additional opportunity to amend the actual process to strengthen this existing arrangement. There is nothing inherent in the risk and planning processes that could be deemed to adversely impact the Code of Ethics..

Pro forma now being used for all reports:

impact on the 9 principles of the Police Code of Ethics. Any negative impact might be inadvertent. You should consider whether any option, recommendation or decision: [Consideration of Code of Ethics - This should explain whether and how any option, recommendation made or decision required, might positively support or negatively

- Strengthens or weakens our accountability as an organisation
 - Casts any doubt over our honesty or integrity
 - Might be considered unfair by anyone
- Supports our leadership aims or might be considered as counter to our leadership principles
 - Is objective, based on evidence and best professional judgement
- Does not inadvertently or otherwise result in anyone being treated without respect
 - Demonstrates that we are acting selflessly in the public interest

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By virtue of paragraph(s) 7 of Part 1 of Schedule 12A of the Local Government Act 1972.



By virtue of paragraph(s) 3, 7 of Part 1 of Schedule 12A of the Local Government Act 1972.



Agenda Item 11a

By virtue of paragraph(s) 3, 7 of Part 1 of Schedule 12A of the Local Government Act 1972.



Agenda Item 12a

By virtue of paragraph(s) 7 of Part 1 of Schedule 12A of the Local Government Act 1972.



Agenda Item 12b

By virtue of paragraph(s) 7 of Part 1 of Schedule 12A of the Local Government Act 1972.



Agenda Item 12c

By virtue of paragraph(s) 7 of Part 1 of Schedule 12A of the Local Government Act 1972.



By virtue of paragraph(s) 7 of Part 1 of Schedule 12A of the Local Government Act 1972.



By virtue of paragraph(s) 7 of Part 1 of Schedule 12A of the Local Government Act 1972.

