



## **Professional Standards and Integrity Sub (Police) Committee**

**Date:** WEDNESDAY, 1 MARCH 2017  
**Time:** 1.45 pm  
**Venue:** COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

**Members:** Alderman Alison Gowman (Chairman)  
Deputy Douglas Barrow (Ex-Officio Member)  
Nicholas Bensted-Smith  
Helen Marshall  
Deputy Richard Regan  
Deputy Henry Pollard (Ex-Officio Member)  
Deputy James Thomson  
James Tumbridge

**Enquiries:** Fern Aldous  
tel. no.: 020 7332 3113  
fern.aldous@cityoflondon.gov.uk

**Lunch will be served in the Guildhall Club at 1pm**

**N.B Part of this meeting could be the subject of audio/visual recording**

**John Barradell  
Town Clerk and Chief Executive**

# 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 and summary of the meeting held on  
**For Decision**  
(Pages 1 - 4)
  4. **PRESENTATION: SPECIAL CONSTABLES IN THE PROFESSIONAL STANDARDS DEPARTMENT**  
The Director of Professional Standards to be heard.  
**For Information**
  5. **INTEGRITY REPORT AND DASHBOARD**  
Report of the Commissioner of Police.  
**For Information**  
(Pages 5 - 16)
  6. **DEVELOPMENT AND DELIVERY PLAN**  
Report of the Commissioner of Police.  
**For Information**  
(Pages 17 - 38)
  7. **HMIC PEEL INSPECTION**  
Report of the Commissioner of Police.  
**For Information**  
(Pages 39 - 44)
  8. **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**
- Non-Public Agenda**
9. **BODY WORN VIDEO CAMERAS**  
Report of the Assistant Commissioner of Police.  
**For Information**  
(Pages 45 - 46)
  10. **MATTERS ARISING FROM PREVIOUS MEETING OF THE SUB-COMMITTEE**  
Report of the Director of Professional Standards.  
**For Information**  
(Pages 47 - 50)

11. **PUBLIC CONFIDENCE SURVEY 2016**  
To receive a letter from the Chair of the Independent Police Complaints Commission (IPCC)
- For Information**  
(Pages 51 - 52)

**Confidential Agenda**

12. **CONFIDENTIAL MINUTES**  
To approve the confidential minutes of the meeting held on 2 December 2016.
- For Decision**
13. **CASES OUTSTANDING FROM PREVIOUS MEETING**  
To discuss the outstanding reports from 2 December 2016.
- For Information**
14. **PROFESSIONAL STANDARDS STATISTICS - QUARTER 3 OCTOBER TO DECEMBER 2016**  
Report of the Commissioner of Police.
- For Information**
- a) Summary of Cases
  - b) Misconduct Hearings
  - c) Misconduct Meetings
  - d) Case to Answer
  - e) No Case to Answer
  - f) Local Resolution
  - g) Discontinuance and Disapplication
15. **IPCC POLICE COMPLAINTS INFORMATION BULLETIN APRIL- DECEMBER 2016**  
Report of the Commissioner of Police.
- For Information**
16. **GLOSSARY OF TERMS**
- (Pages 53 - 60)

This page is intentionally left blank

## PROFESSIONAL STANDARDS AND INTEGRITY SUB (POLICE) COMMITTEE Friday, 2 December 2016

Minutes of the meeting of the Professional Standards and Integrity Sub (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Friday, 2 December 2016 at 11.00 am

### Present

#### Members:

Alderman Alison Gowman (Chairman)  
Helen Marshall  
Deputy James Thomson  
James Tumbridge

#### Officers:

Fern Aldous	-	Town Clerk's Department
Craig Spencer	-	Town Clerk's Department
Jillian Bradbeer	-	Comptrollers and City Solicitor's Department
Alistair Sutherland	-	Assistant Commissioner, City of London Police
Dermont Robinson	-	Director of Professional Standards, City of London Police

#### 1. **APOLOGIES**

Apologies for absence were received from Deputy Doug Barrow, Nicholas Bensted-Smith and Deputy Henry Pollard.

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

There were no declarations of interest.

#### 3. **MINUTES**

**RESOLVED** – That the minutes of the meeting held on 23 September 2016 be approved as an accurate record.

#### 4. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

There were no questions.

#### 5. **ANY OTHER BUSINESS THE CHAIRMAN CONSIDERS URGENT**

There were no items of urgent business.

#### 6. **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 1, Paragraphs 1, 2 and 7 of Schedule 12A of the Local Government Act.

7. **NON-PUBLIC MINUTES**  
**RESOLVED** – That the non-public minutes of the meeting held on 23 September 2016 were approved as an accurate record.
8. **PROFESSIONAL STANDARDS STATISTICS - QUARTER 2 (FOR THE PERIOD 1 JULY - 30 SEPTEMBER)**  
The Sub-Committee received a report of the Commissioner of Police.
  - 8.1 **Summary of Cases**
  - 8.2 **Misconduct Hearings (NIL)**
9. There were no Misconduct Hearings reports to be reported to this Committee.
  - 8.3 **Misconduct Meetings (NIL)**  
There were no Misconduct Meeting reports to be reported to this Committee.
  - 8.4 **Case To Answer**  
The Sub-Committee received a report of the Commissioner of Police.
  - 8.5 **No Case to Answer**  
The Sub-Committee received a report of the Commissioner of Police.
  - 8.6 **Local Resolution**  
The Sub-Committee received a report of the Commissioner of Police.
  - 8.7 **Discontinuance & Disapplication**  
The Sub-Committee received a report of the Commissioner of Police.
9. **INTEGRITY STANDARDS BOARD AND DASHBOARD**  
The Sub-Committee received a report of the Commissioner of Police.
10. **INTEGRITY ACTION PLAN**  
The Sub-Committee received a report of the Commissioner of Police.
11. **IPCC POLICE COMPLAINTS STATISTICS 2015/16**  
The Sub-Committee received a report of the Commissioner of Police.
12. **PSD UPDATE**  
The Sub-Committee received a report of the Commissioner of Police.
13. **EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES**  
The Sub-Committee received a report of the Comptroller and City Solicitor.
14. **NON-PUBLIC QUESTIONS RELATING TO THE WORK OF THE SUB-COMMITTEE**  
There were no non-public questions.
15. **ANY OTHER NON-PUBLIC BUSINESS THE CHAIRMAN CONSIDERS URGENT**

The Chairman resolved an issue in relation to the date of the next meeting.

**The meeting ended at 12:50pm**

-----

Chairman

**Contact Officer: Fern Aldous**  
**tel. no.: 020 7332 3113**  
**fern.aldous@cityoflondon.gov.uk**

This page is intentionally left blank



**RESTRICTED**



Additional reports:

Integrity Standards Board Report &  
Organisational Integrity Dashboard

HMIC PEEL Inspection – Police Legitimacy 2016  
National and City of London Police Reports

Body Worn Video Cameras

Matters arising from the sub-committee meeting of the 2<sup>nd</sup>  
December 2016



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

### Summary

#### *Integrity Standards Board and Dashboard:*

The dashboard presented to your Sub Committee has not yet been considered by the Force Integrity Board due to the date of the meeting being rescheduled to the 15<sup>th</sup> March 2017. The dashboard does not, however, disclose any underlying areas of concern.

#### *Code of Ethics Update:*

The London Police Challenge Forum launched on the 15<sup>th</sup> December and the Force internal panel, which will support the regional forum, met for the first time on 10<sup>th</sup> February 2017. At that meeting the process for submitting ethical dilemmas was agreed together with the methodology of how the group would approach providing feedback to ethical dilemmas.

Additional activities undertaken to embed the Code of Ethics include:

- o Professional Standards Department feeding into the Force strategic process that identifies and thereafter manages principal areas of threat, harm and risk, from a counter corruption and professional behaviour perspective.
- o The development of a 'Professionalism Newsletter' which will highlight best practice and establish acceptable standards of behaviour (due to be launched in late March/early April 2017).
- o An Ethics –themed communications month (February 2017)
- o Changes to Force templates and agendas to support consideration of the Code of Ethics when making decisions.

### 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 therefore indicates the extent to which the Force's workforce acts with integrity and is attached for Members' information at Appendix 1.
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 2.

### **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. It usually sits shortly before your Sub Committee so that an update can be provided to Members. It was necessary to reschedule the 3<sup>rd</sup> quarter meeting to the 15<sup>th</sup> March 2017 meaning the dashboard that is presented to your Sub Committee for information has not yet been considered by the ISB.
4. The dashboard shows a healthy position for the period 1<sup>st</sup> October to 31<sup>st</sup> December. The volume of matters reported continues to be very low and at this stage there are no underlying issues of concern identified. When the dashboard is considered at the ISB, that group might have additional observations or questions, however, the raw data does not disclose any matters that need to be brought to your Sub Committee's attention.
5. This report would normally also include a summary of discussions that took place at the preceding ISB, as that group has not yet met for the 3<sup>rd</sup> quarter, it follows that no update can be included in this report.

#### *Code of Ethics Update*

6. The London Police Challenge Forum was officially launched on 15<sup>th</sup> December 2016 at the Brompton Oratory by the three founding forces<sup>1</sup>. The Force was represented by the Assistant Commissioner and Detective Chief Superintendent Crime Directorate together with the majority of Force Ethics Associates and a representative of the Town Clerk's Department.

---

<sup>1</sup> City of London Police, Metropolitan Police and British Transport Police.

7. Following the launch, the Force has convened its first meeting of associates where the process to submit ethical dilemmas was agreed. An intranet portal is to be developed which will allow staff to highlight any ethical dilemma. The group will then meet monthly to consider issues submitted. All submissions will be open to view by anyone and structured feedback will be provided following each meeting. It was agreed that each submission would be assessed against the 9 principles of the Police Code of Ethics (enabling the feedback to be specific about any specific principles that are breached) together with an assessment of the impact the scenario potentially has on victims or service delivery (and therefore confidence in policing).
8. Complex issues or those that engender most debate will be fed through to the Regional London Police Challenge Forum for further deliberation. Once the process has been embedded, it is proposed to invite community representatives to meetings to take part in the discussions. The aim of this is to support accountability and demonstrate the Force's transparency at how it is addressing ethical policing.
9. The Police Integrity Implementation Plan attached to this report as Appendix 2 for Members' information also provides details of activities undertaken to further embed the Police Code of Ethics. This includes:
  - a. Professional Standards Department feeding into the Force strategic process that identifies and thereafter manages principal areas of threat, harm and risk, from a counter corruption and professional behaviour perspective.
  - b. The development of a 'Professionalism Newsletter' which will highlight best practice and establish acceptable standards of behaviour (due to be launched in late March/early April 2017).
  - c. An Ethics –themed communications month (February 2017), launched with an article titled 'The only way is Ethics' and supported by articles on the link between leadership and ethics, why individuals want to act as ethics associates and how ethical dilemmas can be submitted to the Internal Ethics Panel.
  - d. The Ethics themed month is being complemented by messages on static electronic screens in corridors and canteens and will be included in the new 'Force cascade' which encourages face to face communication of key messages.
  - e. The impact assessment that accompanies the report template to all Force strategic meetings has been amended to incorporate the 9 principles of the Code of Ethics.
  - f. A standing agenda item has been included on the SMB agenda to prompt the board to consider whether there is a Code of Ethics or victim/service delivery impact to any decisions taken by the Board.

10. As a result of the actions outlined above, indicators 1.5, 1.7, 2.6 and 2.7 have turned from AMBER to GREEN on the implementation plan.

### **Appendices**

- Appendix 1 – Integrity Dashboard
- Appendix 2 – Integrity and Code of Ethics Implementation Plan

**Stuart Phoenix**

Head of Strategic Development

T: 020 7601 2213

E: [Stuart.Phoenix@cityoflondon.pnn.police.uk](mailto:Stuart.Phoenix@cityoflondon.pnn.police.uk)

APPENDIX 1 - Organisational Integrity Dashboard  
Reporting period October to December 2016

Indicator	Previous Years				Grievances				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
1	8	7	7	7	3	5	4	12					
<p>Of the 4 grievances raised during the quarter, 3 were raised in October 2016 and relate to complaints against 1 individual. 1 of these grievances was concluded informally whilst the other 2 concluded in January 2017 with recommendations which have already been instigated. None of the grievances related to integrity issues.</p>													

Indicator	Previous Years				ETs				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
2	4	0	2	0	1	1	0	2					
<p>The number of ETs which cite the Force.</p>													

Indicator	Previous Years				Complaints excluding Action Fraud				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
3	110	60	117	105	23	33	30	86					
<p>There were 30 complaints recorded during the Q3 period and 52 allegations (both excl Action Fraud). Of these 52, the Top 5 National Allegation categories accounted for:- Other assault x 2; Oppressive Conduct/Harassment x 1; Unlawful/unnecessary arrest or detention x 2; Other neglect or failure in duty x 8; Incivility/Impoliteness/ Intolerance x 4.</p>													

Indicator 4	Previous Years					Civil Cases				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016		2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
	20	14	24	23						1	8	3		12

There were 3 civil cases recorded during Q3:

- 1 case with claim for Assault/Battery; False Imprisonment; Misceasance; Negligence; Slander/Libel/ Defamation.
- 1 case with claim for Misfeasance and Racial Discrimination.
- 1 case with application for Judicial Review (relating to Action Fraud issue and advice given around other avenues of resoution)

Indicator 5	Previous Years					Force Mobile Telephones				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016		2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
	0	0	0	0		1	0	0	0	1	0	0		1

Investigations resulting from monitoring of Irregular mobile phone use

Monitoring over Quarter 3 has not led to any investigations over the quarter.

Indicator 6	Previous Years					Corporate Credit Card Transactions				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016		2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
		0	1	5						4	14	0		18

Irregular credit card use/transactions are monitored

Data not available for 2012/2013 - not recorded

There were 3 separate monitoring exercises during quarter 3, none of which required further assessment.



**NOT PROTECTIVELY MARKED - NO DESCRIPTOR**

Indicator 7	Previous Years				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
	1	3	13		4	2			6

Data not available for 2012/2013

Mobile tablet devices are now being used to record instances of use of force. Professional Standard staff are receiving training to facilitate direct access to this system which will enhance analysis from the current position. During the 3rd quarter 2 allegations of 'Other Assaults' were recorded:

1) The complainant was arrested at his place of work after a tip-off that he was intending to bomb the premises. The tip-off was subsequently assessed as malicious and the complainant was treated as a witness who was asked to assist with identifying the perpetrator. However, the complainant's solicitors are alleging that the complainant was assaulted at the time of the arrest.

2) The complainant alleges that when he was searched, force was used when handcuffed to the rear upon arrest and he was subsequently taken into custody and strip searched.

Indicator 8	Previous Years				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
	0	1	2		0	0	0		0

Data not available for 2012/2013

Intelligence led research is conducted.

No monitoring or further assessments undertaken in Q3

Indicator 9	Previous Years				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
	1	3	1		4	1	0		5

Data not available for 2012/2013

Business Interests Analysed-Police  
Business interests are monitored

There were 8 Business Interests recorded in Q3 for Police Officers - 2 x Sales; 1 each x Taxi Driver; Freelance art and design; Fitness instructor; Rental Property; Supply of goods or services; Entertainment/Performing.

There is currently 1 ongoing business interest investigation in progress, first reported in the quarter 2 ISB dashboard 2016/2017.

There are a total of 101 live Business Interests declared (both officers and civilian).

**NOT PROTECTIVELY MARKED - NO DESCRIPTOR**

Indicator 10	Previous Years				Business Interests Analysed-Civilian				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	Business interests are monitored				Qtr1	Qtr2	Qtr3	Qtr4	Total
		0	0	0					0	0	0	0	0

Data not available for 2012/2013

There were 2 Business Interests recorded in Q3 for Civilian Staff -1 x bar staff member and football coach volunteer and 1 x Lodger at home address. No investigations in the 3rd quarter relating to civilian staff.

There are a total of 101 Live Business Interests declared (both officers and civilian).

Indicator 11	Previous Years				Media Contacts				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	Unregistered Col.P Media contacts detected by Corp Comms and reported to PSD.				Qtr1	Qtr2	Qtr3	Qtr4	Total
		0	2	0					1	0	1		2

Data not available for 2012/2013

There was 1 investigation during the quarter 3 period.

Indicator 12	Previous Years				Information Security				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	Dip sample 1% of daily PNC checks				Qtr1	Qtr2	Qtr3	Qtr4	Total
		1	1	2	Dip sample 1% of daily PND checks				0	0	0	0	0

Data not available for 2012/2013

No investigations in quarter 3 which related to breaches of PNC or PND security.

Indicator	Previous Years				Gifts and Hospitality				
	2012/2013	2013/2014	2014/2015	2015/2016	Analysis of gifts and hospitality register and cross referencing to other sources.				
13		0	5	3	Qtr1	Qtr2	Qtr3	Qtr4	Total
					4	0	2		6

Data not available for 2012/2013

There were 10 separate monitoring exercises during quarter 3 - 2 of which required further assessment. As at 3rd January 2017 there were 165 Gifts and Hospitality submissions recorded during Quarter 3. 110 were showing as accepted, 32 as declined. Of the 165, 74 related to NPCC.

Of the 165, 47 showed neither a Line Manager nor Directorate Head approval/decision/authorisation.

Indicator	Previous Years				Re - Vetting				
	2012/2013	2013/2014	2014/2015	2015/2016	Management of issues arising from re-vetting of the workforce				
14				0	Qtr1	Qtr2	Qtr3	Qtr4	Total
					0	0	0	0	0

During the period of Q3 there were no vetting management issues arising from current employees being re-vetting.

There were 33 refusals from external applicants, mainly due to honesty/integrity or financial concerns. There were a total of 255 new vetting applications received during Q3, with 246 applications being completed, and 297 still pending at the close of the quarter.

Indicator	Previous Years				Procurement				
	2012/2013	2013/2014	2014/2015	2015/2016	The number of assessed products by PSD for further investigation				
15		0	0	2	Qtr1	Qtr2	Qtr3	Qtr4	Total
					0	0	1		1

Data not available for 2012/2013

1 investigation relating to issues of Conflict of Interest and Procurement.

Indicator 16	Previous Years				Drug Testing				
	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
				0	0	0	0	0	0

No 'with cause' testing was required during the 3rd quarter. Random drug testing has recommenced in January 2017.

Indicator 17	Previous Years				Sponsorship				
	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total

Dashboard metrics to be developed following approval and dissemination of the Force SOP.

A draft Sponcership SOP is being developed by Finance in consultation with Professional Standards. Strategic Development has obtained 4 current policies from other forces to assist in the development of the Force's own. The policy is due to be approved during Quarter 4.

Indicator 18	Previous Years				CAD Closures				
	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
						1	0	0	1

Monthly dip samples have been completed for October, November and December 2016. Pass rates have improved over this period from 76.7% to 86.6% and failures are being addressed via training - no possible issues of integrity have been identified for this period.

Referring to the possible integrity instance recorded in the 2nd quarter [above] - explanation has now been received from the officers involved and it is clear this was a matter of ambiguity and misunderstanding of Home Office Crime Recording rules [shoplifting].

**NOT PROTECTIVELY MARKED**

**POLICE INTEGRITY DEVELOPMENT  
and DELIVERY PLAN REPORT**  
**January 2017**



**NOT PROTECTIVELY MARKED**

**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**

	Traffic Light Colour
<b>1. Commit Measures</b>	
1.1 Force has issued a statement committing to support and embed the Police Code of Ethics	GREEN
1.2 To maintain the Force Integrity Delivery Plan	GREEN
1.3 To maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force	GREEN
1.4 To maintain Directorate SPOCs to lead on integrity within their areas	GREEN
1.5 To have defined the Force approach to corruption within appropriate SOPs and supporting statements	GREEN
1.6 To have established a process for internally and externally communicating corruption /integrity/ misconduct outcomes	GREEN
1.7 To have established a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates)	GREEN
1.8 To have appointed a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan	GREEN
1.9 To ensure training on standards, values and leadership ethics is available for all staff	GREEN
1.10 To adopt APP and national guidance for Force policies and procedures	GREEN
<b>2. Development Measures</b>	
2.1 Maintain awareness of integrity obligations amongst workforce	GREEN
2.2 Reinforce the 'tone from the top' from chief officers	AMBER
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	WHITE
2.4 Ensure all relevant public consultations and internal surveys contain integrity questions	AMBER
2.5 Ensure the Force public website will contain clear and easily accessible information on integrity/transparency	AMBER
2.6 Improve the efficacy of messaging around ethics and the Code	GREEN
2.7 Embed the principles of the Code of Ethics into corporate decision making	GREEN
2.8 Review key Force planning processes (financial, business planning and risk) to incorporate consideration of the Police Code of Ethics	AMBER

**NOT PROTECTIVELY MARKED**

**PERFORMANCE REPORT**

Traffic Light Colour	Definition of measure achievement
GREEN	Aim is achieved in date and to level set.
AMBER	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.

Target Report Checklist
<ul style="list-style-type: none"><li>• Current level of achievement</li><li>• Dates for work completed</li><li>• Dates future work will be completed by (milestones)</li><li>• Reasons for current achievement level</li><li>• Any risks that have been realised</li><li>• Work undertaken to manage realised risk</li><li>• Work to be undertaken to manage risk against target</li><li>• Impact of other indicators on this work area</li><li>• 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.</li></ul>

**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
<b>MEASURE</b>	<b>1.1. Force has issued a statement committing to support and embed the Police Code of Ethics</b>
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	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
<b>DUE DATE</b>	December 2016
<b>MEASUREMENT</b>	Record date and document statement is issued within and to be reviewed annually
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Statement issued. Amber: Statement being drafted. Red: Statement not issued or out of date by more than three months
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
<p>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 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.</p>	



**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
<b>MEASURE</b>	1.2 To maintain the Force Integrity Delivery Plan
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	To ensure work relating to integrity, including the continued embedding of the Police Code of Ethics, progresses and is reported routinely to the Integrity Standards Board and Police Professional Standards and Integrity Sub Committee.
<b>MEASUREMENT</b>	Existence of a plan which is reported to ISB quarterly
<b>DUE DATE</b>	December 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Plan exists Amber: Plan being drafted. Red: Plan not issued or out of date by more than three months
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
This plan was accepted by the by the ISB at its meeting on the 14 <sup>th</sup> November 2016	

**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
<b>MEASURE</b>	1.3 To maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	To monitor activities relating to workforce and organisational integrity and drive activity with regard to integrity and transparency.
<b>MEASUREMENT</b>	Group exists, meets regularly and provides reports to the Professional Standards and Integrity Sub Committee
<b>DUE DATE</b>	November 2016
<b>TRAFFIC LIGHT CRITERIA</b>	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
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
<p>The Integrity Standards Board is now established; it is chaired by the Assistant Commissioner, attended by all directorates and representatives from the Town Clerk's Department and Police Committee. The meetings are quarterly and minuted.</p> <p>The last meeting was 14<sup>th</sup> November 2016. The next meeting will be 15<sup>th</sup> March 2017.</p>	

**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
<b>MEASURE</b>	1.4 To maintain Directorate SPOCs to lead on integrity within their areas
<b>OWNER</b>	Directorate Heads (Head of Strategic Development to coordinate)
<b>AIM/RATIONALE</b>	To ensure Directorates are fully linked into integrity monitoring and activities that support the continued development of integrity within the Force.
<b>MEASUREMENT</b>	Directorate SPOCs exist and attend ISB.
<b>DUE DATE</b>	November 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Directorate representation exists and attends ISB Amber: Directorate SPOCs exist but Directorates have not been represented at 1 ISB Red: Directorate representation does not exist or directorates have not been represented at 2 or more consecutive meetings.
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
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.	

**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
<b>MEASURE</b>	1.5 To have defined the Force approach to corruption within appropriate SOP's and supporting statements
<b>OWNER</b>	Head of Professional Standards
<b>AIM/RATIONALE</b>	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
<b>MEASUREMENT</b>	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 Police Integrity Model detailing the zero tolerance approach
<b>DUE DATE</b>	December 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Position articulated and published. Amber: Process in development Red: No process or past the due by date by 3 months or more
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	<p>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, which has recently (February) been reinforced by intranet articles.</p> <p>PSD is specifically feeding into the strategic processes to identify (and thereafter manage) threat, risk and harm, and includes counter corruption amongst other PSD-related issues.</p> <p>A new Professionalism newsletter is being developed and is due to launch late March/early April, which will include articles around raising awareness of corruption and acceptable behaviours.</p>

**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
<b>MEASURE</b>	1.6 To have established a process for internally and externally communicating corruption /Integrity/ misconduct outcomes
<b>OWNER</b>	Director of Professional Standards
<b>AIM/RATIONALE</b>	To support the transparency, facilitate organisational learning and provide confidence that the force is openly addressing issues relating to corruption, integrity and misconduct. .
<b>MEASUREMENT</b>	Process established and maintained
<b>DUE DATE</b>	December 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Process established and being used. Amber: Process established but not being consistently used Red: No process or process routinely not used
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
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 (most recent example: 7 <sup>th</sup> November 2016).	

**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
<b>MEASURE</b>	<b>1.7 To have established a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates)</b>
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	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.
<b>MEASUREMENT</b>	Process in place and being used.
<b>DUE DATE</b>	March 2017
<b>TRAFFIC LIGHT CRITERIA</b>	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
<b>TRAFFIC LIGHT</b>	<b>GREEN</b>
<b>CURRENT POSITION</b>	
<p>The formal launch of the London Panel Challenge Forum took place on 15<sup>th</sup> December 2016. The milestones are as below:</p> <ol style="list-style-type: none"> <li>1. 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.</li> <li>2. LPCF launched – complete – launched on 15<sup>th</sup> December 2016.</li> <li>3. 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 2017). The first internal meeting took place on 10<sup>th</sup> February where the process to submit and consider ethical issues was agreed. An intranet site is now being developed so that people can raise issues online (anonymously if preferred). The site will also be used to provide feedback.</li> </ol>	

**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
<b>MEASURE</b>	<b>1.8 To have appointed a chief officer lead on integrity and ensure their active involvement in the oversight of the integrity plan</b>
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	To ensure chief officer ownership and oversight of ethical and integrity issues within Force
<b>MEASUREMENT</b>	Chief officer lead appointed
<b>DUE BY</b>	November 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Chief officer lead appointed and active Amber: Chief Officer lead appointed but not active in role Red: No chief officer lead. .
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
<p>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 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 Grand Committee and the Professional Standards and Integrity Sub Committee.</p>	

**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
<b>MEASURE</b>	1.9 To ensure training on standards, values and leadership ethics is available for all staff
<b>OWNER</b>	Director of HR
<b>AIM/RATIONALE</b>	To ensure staff are supported in their duty to uphold the Force's integrity standards
<b>MEASUREMENT</b>	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
<b>DUE DATE</b>	November 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Training courses are fully available within a rolling yearly programme. Amber: Training courses are still in development. Red: No training courses are available.
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	Information on standards, values and leadership is available to all staff on the intranet. All courses, Inspectors, Sergeants, Custody, PST 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 L&D trainers but also PSD. 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.



**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
<b>MEASURE</b>	<b>1.10</b> To adopt APP and national guidance for Force policies and procedures
<b>OWNER</b>	Directorate Heads (co-ordinated by Head of Strategic Development)
<b>AIM/RATIONALE</b>	To ensure the Force complies with national standards with regard to policies and SOPs
<b>MEASUREMENT</b>	Strategic Development will maintain a watching brief on published APP to ensure all new/revised APP is considered by Policy owners.
<b>DUE DATE</b>	November 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: APP adopted or force position reviewed against APP. Amber: APP introduced and review is required RED: APP not considered
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
<p>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 January 2017).</p> <p>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 hospitality, expenses, use of telephones/ICT systems, sponsorship etc.). Strategic Development checks the College of Policing APP site monthly to identify any revised or new APP to ensure it is considered by the Force. Any such identified APP will be reported as part of this action plan.</p>	

**NOT PROTECTIVELY MARKED**

2. Development Measures	
<b>MEASURE</b>	2.1 Maintain awareness of integrity obligations amongst workforce
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	To ensure that integrity remains in the forefront of people's minds
<b>MEASUREMENT</b>	HoSD to provide ISB with details of integrity-related activities and evidence of publication.
<b>DUE BY</b>	QUARTERLY UPDATES to ISB
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Integrity related activities undertaken and articles published Amber: Statement published with strategy under development. Red: No integrity related activity undertaken.
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
<p>To complement the PSD-related Communications month that ran in October 2016, February has been designated 'Ethics' month. The month was launched 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 leadership. Articles are also due to be published during the month focussing on staff members who have volunteered to be ethics associates. Once the intranet site for submitting and providing feedback on ethical related issues is running, a launch article will be featured on City net.</p> <p>Workforce integrity obligations will be re-enforced in the Professionalism Newsletter which is being launched late March/early April 2017.</p>	

**NOT PROTECTIVELY MARKED**

2. Development Measures	
<b>MEASURE</b>	2.2 Reinforce the 'tone from the top' from chief officers
<b>OWNER</b>	Director of Professional Standards/Head of Strategic Development
<b>AIM/RATIONALE</b>	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
<b>MEASUREMENT</b>	The SLT to publicise to the Force its planned actions to demonstrate ongoing integrity.
<b>DUE BY</b>	March 2017
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Event held and implementation plan developed and being delivered; AMBER EVENT held, implementation plan still in development past the due date; RED: Event not held and no implementation plan either developed or being delivered.
<b>TRAFFIC LIGHT</b>	AMBER
<b>CURRENT POSITION</b>	
<p>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.</p> <p>As at January 2017 the event had not taken place. It is scheduled to be addressed at the Senior Leadership Meeting on 21<sup>st</sup> March 2017.</p>	

**NOT PROTECTIVELY MARKED**

2 Development Measures	
<b>MEASURE</b>	<b>2.3 Conduct an annual review of the Force integrity programme and implement identified improvements</b>
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	To ensure the Force continues to develop its approach to integrity and has plans to embed best practice.
<b>MEASUREMENT</b>	Review completed and reported to ISB
<b>DUE BY</b>	September 2017
<b>TRAFFIC LIGHT CRITERIA</b>	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.
<b>TRAFFIC LIGHT</b>	<b>WHITE</b>
<b>CURRENT POSITION</b>	
The review for 2016-17 has taken place, triggered by the Integrity workshop in Qtr 3. The next review will take place in August 2017.	

**NOT PROTECTIVELY MARKED**

2 Development Measures	
<b>MEASURE</b>	2.4 Conduct a full staff survey and ensure that the survey addresses integrity
<b>OWNER</b>	HR Director
<b>AIM/RATIONALE</b>	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.
<b>MEASUREMENT</b>	Force will have an independent committee established with a defined meeting programme
<b>DUE BY</b>	May 2017
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Survey complete, results published and action plan produced. Amber: Survey completed by the due date but results unpublished and action plan still in development. Red: Survey not completed by due date.
<b>TRAFFIC LIGHT</b>	AMBER
<b>CURRENT POSITION</b>	<p>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.</p> <p>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.</p>

2 Development Measures	
<b>MEASURE</b>	<b>2.5 Ensure the Force public website will contain clear and easily accessible information on integrity/transparency</b>
<b>OWNER</b>	Head of PSD
<b>AIM/RATIONALE</b>	To support the national transparency agenda regarding the publication of chief officer expenses, salaries, business interests and gifts and hospitality.
<b>MEASUREMENT</b>	Information published and current
<b>DUE BY</b>	March 2017 (with regard to the future developments)
<b>TRAFFIC LIGHT CRITERIA</b>	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.
<b>TRAFFIC LIGHT</b>	AMBER
<b>CURRENT POSITION</b>	
<p>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. As at January 2017 this had not been completed.</p> <p>There is a process in place to review the information on the website, however, having it as part of this plan will ensure it is routinely checked and reported to ISB/Professional Standards and Integrity Sub Committee.</p>	

**NOT PROTECTIVELY MARKED**

2 Development Measures	
<b>MEASURE</b>	<b>2.6 Improve the efficacy of messaging around ethics and the Code</b>
<b>OWNER</b>	Corporate Communications Director
<b>AIM/RATIONALE</b>	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.
<b>MEASUREMENT</b>	Different forms of messaging being used; improvement to be identified through staff survey
<b>DUE BY</b>	March 2017 (with regard to proposals for implementation)
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Proposal made and being implemented. Amber: Proposals made but not yet implemented Red: No proposals made by the due date.
<b>TRAFFIC LIGHT</b>	<b>GREEN</b>
<b>CURRENT POSITION</b>	<p>Corporate Communications has recently proposed a new internal and external communications strategy, which looks at a variety of different approaches to effective communication. A meeting took place between the Head of Strategic Development and the Corporate Communications Director in early December 2016 to explore how the new approaches can be used to promote integrity and ethical behaviour.</p> <p>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 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 key messages) throughout the year.</p> <p>The Professionalism Newsletter will further complement the messaging.</p>

**NOT PROTECTIVELY MARKED**

2 Development Measures	
<b>MEASURE</b>	<b>2.7 Embed the principles of the Code of Ethics into corporate decision making</b>
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	The aim of this measure is to evidence consideration of the Code of Ethics' principles in corporate decision making.
<b>MEASUREMENT</b>	Amendments made to standard report templates/impact assessments to incorporate the principles of the Code of Ethics
<b>DUE BY</b>	December 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Amendments made to all Force standard report templates Amber: Amendment proposals being developed Red: No amendments made by due date
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
<p>The impact assessment template that is attached to all Force report templates has been amended to include consideration of 9 principles of the Code of Ethics. Additionally, a standing agenda item has been added to all strategic meetings that prompts the board to consider the decisions made at the meeting to ascertain whether there is a Code of Ethics or victim/service delivery implication to the decision taken.</p>	



**NOT PROTECTIVELY MARKED**

2 Development Measures	
<b>MEASURE</b>	<b>2.8</b> Review key Force planning processes (financial, business planning and risk) to incorporate consideration of the Police Code of Ethics
<b>OWNER</b>	Head of Governance and Assurance
<b>AIM/RATIONALE</b>	The aim of this measure is to assess opportunities to design integrity into core planning processes that are performed throughout the year
<b>MEASUREMENT</b>	Review complete and amendments made (where possible) to risk and planning processes.
<b>DUE BY</b>	April 2017
<b>TRAFFIC LIGHT CRITERIA</b>	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 any processes.
<b>TRAFFIC LIGHT</b>	AMBER
<b>CURRENT POSITION</b>	
<p>Head of Governance and Assurance is reviewing processes for planning and risk that will be completed for 2017 plans to come on line by April 2017. Proposals for implementation resulting from the review will be reported to the March ISB.</p>	



<b>Committee(s):</b> Police: Professional Standards and Integrity Sub Committee	<b>Date:</b> 1 <sup>st</sup> March 2017
<b>Subject:</b> HMIC PEEL Inspection – Police Legitimacy 2016 National and City of London Police Reports	<b>Public</b>
<b>Report of:</b> Commissioner of Police	<b>For Information</b>
<b>Report author:</b> Stuart Phoenix, Head of Strategic Development	

### Summary

The Force was inspected under Her Majesties Inspectorate of Constabulary (HMIC) PEEL<sup>1</sup> Inspection Programme for the Legitimacy element in June 2016. A national inspection was also conducted. The results of the national and force inspections were published on the 8<sup>th</sup> December 2016.

The City of London Police was graded overall as **GOOD** with judgements as follows for each of the three inspection criteria:

- Extent treats people serves with fairness and respect      **GOOD**
- Extent workforce behaves ethically and lawfully              **GOOD**
- Extent treats workforce with fairness and respect      **REQUIRES IMPROVEMENT**

5 Force specific Areas for Improvement (AFIs) were identified-

#### **AFIs**

1. The Force should improve how it demonstrates that it has taken action to improve how it treats all the people it serves.
2. Annually, the Force should produce a counter-corruption strategic assessment and control strategy, to identify risks to the force's integrity.
3. The force should improve how it clarifies and reinforces standards of behaviour to its workforce, in particular when dealing with vulnerable people, including victims of domestic abuse.
4. The force should improve how it identifies and understands its workforce's wellbeing needs.
5. The force should improve how it manages individual performance of its officers and staff.

Additionally, in the national inspection 3 Causes of Concern were identified with 5 supporting recommendations made, which are all applicable to the Force.

The AFIs / national recommendations now form part of the Force HMIC Action Plan report which is monitored monthly at the Force Performance Management Group (PMG) and are also reported as a matter of course and as a standing item quarterly to your Police Performance and Resource Management Sub Committee of which the Chairman, Alderman Gowman, is a Member.

### Recommendation

Members are asked to: Note the report.

<sup>1</sup> PEEL Inspections- Police Efficiency Effectiveness and Legitimacy inspections

## Main Report

### Background

1. The PEEL Inspection programme is the HMIC's annual all-force inspection programme covering forces' effectiveness, efficiency and legitimacy.
2. The Spring PEEL inspection for 2016 considered Legitimacy, Efficiency and Leadership strands of PEEL; this report relates to the part of the inspection that focused on legitimacy. (Efficiency reports / results were considered by SMB in December 2016 and the Leadership element is subject of a separate report to this meeting).
3. Although the question sets for each inspection change from year to year the overall focus as regards legitimacy remains the same:
  - The extent to which forces treat people with fairness and respect,
  - The extent to which forces ensure their workforce acts ethically and lawfully.
  - The extent to which a force's workforce themselves have been treated with fairness and respect.
4. The Force was inspected during w/c 13<sup>th</sup> June 2016 following data and document collection exercises in March/April along with insight visits conducted throughout the year.
5. The outcomes of the process would result in one of 4 possible graded judgements, outstanding, good, requires improvement and inadequate. (Judgement here is being made against how legitimate the force is at keeping people safe and reducing crime and not an assessment of the overall legitimacy of policing).
6. Forces were graded against three Inspection criteria
  - To what extent do forces treat all the people it serves with fairness and respect?
  - To what extent do forces ensure the workforce behaves ethically and lawfully?
  - To what extent do forces treat the workforce with fairness and respect?

### Current Position

#### City of London Police Report

7. On 8<sup>th</sup> December 2016 HMIC published its national PEEL Police Legitimacy 2016 report alongside individual force reports for England and Wales. Overall the City of London Police was graded **GOOD**, the same as in 2015.
8. For comparison purposes, HMIC national overall gradings are as follows:

Grading	Forces
Outstanding	2 (Derbyshire and Kent)
Good	36 (including City of London Police)
Requires Improvement	5 (Cleveland, Dyfed Powys, Gloucestershire, North Wales and South Yorkshire)
Inadequate	0

9. As well as each force being given an overall judgement grading, forces were also graded against each of the three inspection questions. The City of London Police gradings were:

- Extent treats people serves with fairness and respect **GOOD**
- Extent workforce behaves ethically and lawfully **GOOD**
- Extent treats workforce with fairness and respect **REQUIRES IMPROVEMENT**

10. The detailed Force findings are summarised below:

**A. To what extent do forces treat all the people it serves with fairness and respect?**

- The Force is good at treating all the people it serves with fairness and respect and engages well with its communities and has a good understanding of the different communities and people within the City of London Corporation (CoL).
- The Force could do more to develop its understanding of the issues that have the greatest impact on public perceptions of fair and respectful treatment
- Public surveys conducted to date do not specifically deal with the issue of treatment.
- Communication feedback (e.g. use of social media) is in the main only one way and the Force should do more to demonstrate to the public that it has acted on feedback.
- Communications strategy needs to include consideration as to how communities are made aware of response to feedback / challenge and what action if any has been taken.

**B. To what extent ensures workforce behaves ethically and lawfully?**

- The Force has developed and maintained an ethical culture and effectively identifies integrity by robust and frequent monitoring of its staff.
- The Force uses a range of methods to identify the areas that have the greatest effect on workforce perceptions of fair and respectful.
- Force vetting policy is comprehensive and complies with national vetting guidance (*therefore compliance with national report recommendation 1 is met*)
- The Force does not monitor ethnicity or UK national status of applicants who fail vetting checks so cannot demonstrate it understands the extent to which vetting process may affect recruitment of a diverse workforce.
- The Force should develop its counter-corruption strategy to meet the threats the Force has identified. (*Development of strategy which identifies risks to*

*integrity based on local information is noted as having commenced but not yet completed.)*

- The Force is only at early stages of understanding the seriousness of abuse of authority for sexual gain and has not undertaken any activity to raise awareness among wider workforce.
- The Force should improve its approach to identifying staff who seek to abuse their authority for sexual gain (first step being to recognise it as serious corruption within its anti corruption control strategy).

### **C. To what extent treats workforce with fairness and respect?**

- The Force could do more to demonstrate how it has responded to staff concerns.
- Immediate line managers are often unaware of welfare indicators or emerging issues although these are provided to senior managers.
- Of concern is that wellbeing identification training not provided to line managers (although looking to address in next 6 – 12 months).
- The Force could do more to demonstrate that performance assessment is fair and effective with central oversight.
- The link between talent spotting arrangements and PDR processes not obvious.
- There is no evidence that the Force monitors the effectiveness and fairness of PDR reviews by ethnicity, gender, role or rank.

11. The Force report contained 5 Areas for Improvement as follows:

#### **AREAS FOR IMPROVEMENT (AFIs)**

##### **AREA FOR IMPROVEMENT 1**

The Force should improve how it demonstrates that it has taken action to improve how it treats all the people it serves.

##### **AREA FOR IMPROVEMENT 2**

Annually, the Force should produce a counter-corruption strategic assessment and control strategy, to identify risks to the force's integrity.

##### **AREA FOR IMPROVEMENT 3**

The Force should improve how it clarifies and reinforces standards of behaviour to its workforce, in particular when dealing with vulnerable people, including victims of domestic abuse.

##### **AREA FOR IMPROVEMENT 4**

The Force should improve how it identifies and understands its workforce's wellbeing needs.

##### **AREA FOR IMPROVEMENT 5**

The Force should improve how it manages individual performance of its officers and staff.

## National Report

12. For Members' information and interest the full national report can be found at: PEEL: Police Legitimacy 2016 Report - A national overview  
<http://www.justiceinspectrates.gov.uk/hmic/wp-content/uploads/peel-police-legitimacy-2016.pdf>
13. However, in summary, the national report contained 3 'causes for concern' with a total of 5 recommendations made, all of which are applicable to the City of London Police as they are to every other force.

### **CAUSE FOR CONCERN**

**HMIC is concerned that some forces are failing to comply with current national vetting policy. This means that forces are employing individuals who have not undergone even basic vetting checks, which represents a significant risk to the integrity of the organisation.**

### **RECOMMENDATION 1**

Within six months (*end June 2017*), all forces not already complying with current national vetting policy should have started to implement a sufficient plan to do so. (Note: City of London Police already complies with this, confirmed in the City-specific report).

### **RECOMMENDATION 2**

Within two years (*end of December 2018*), all members of the police workforce should have received at least the lowest level of vetting clearance for their roles.

### **CAUSE FOR CONCERN**

**HMIC is concerned that forces do not always recognise the problem of abuse of authority for sexual gain as a form of serious corruption. This means that this understanding is not always being reflected in the force's IPCC referral decisions, and there is no clear picture of the scale of the problem throughout police forces.**

### **RECOMMENDATION 3**

Within three months (*end of March 2017*), all forces should complete a retrospective review of allegations and consider referrals to the IPCC.

### **RECOMMENDATION 4**

Within three months (*end of March 2017*), forces should establish effective procedures to identify all future allegations of abuse of authority for sexual gain as serious corruption matters and make appropriate referrals to the IPCC.

### **CAUSE FOR CONCERN**

**HMIC is concerned that some police counter corruption units do not have the capability or capacity to seek intelligence on potential abuse of authority for sexual gain. This means that forces are not able to intervene early to safeguard potential victims and tackle unacceptable and potentially corrupt behaviour.**

## **RECOMMENDATION 5**

Within six months (*end June 2017*), all forces should have started to implement a plan to achieve the capability and capacity required to seek intelligence on potential abuse of authority for sexual gain. These plans should include consideration of the technology and resources required to monitor IT systems actively and to build relationships with the individuals and organisations that support vulnerable people.

## **Corporate & Strategic Implications**

14. The majority of the Force specific AFIs and national recommendations fall under the actual remit of the Professional Standards Department (PSD) for delivery, albeit in conjunction with Human Resources and operational Directorates.
15. After formal presentation of the reports at the Force's Strategic Management Board (SMB) in January 2017, these recommendations / areas for improvement now form part of the Force's HMIC Action Plan report. This report is monitored at the Force Performance Management Group (PMG) and is also reported as a standing item quarterly to your Police Performance and Resource Management Sub Committee, of which the Chairman, Alderman Gowman, is a Member.

## **Conclusion**

16. The Force was judged overall as **GOOD** in this inspection but recognises that there are a number of AFIs and will endeavour to deliver on these in the required timeframe.

## **Appendices**

None

## **Background Papers**

PEEL: Police Legitimacy 2016 Report

A national overview

<http://www.justiceinspectors.gov.uk/hmic/wp-content/uploads/peel-police-legitimacy-2016.pdf>

City of London Police – PEEL Police Legitimacy 2016

<http://www.justiceinspectors.gov.uk/hmic/wp-content/uploads/peel-police-legitimacy-2016-city-of-london.pdf>

**Stuart Phoenix**

**Head of Strategic Development**

T: 020 7601 2213

E: [stuart.phoenix@cityoflondon.pnn.police.uk](mailto:stuart.phoenix@cityoflondon.pnn.police.uk)



By virtue of paragraph(s) 1, 2 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1, 2 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 1, 2 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

**RESTRICTED**



## Report on Professional Standards Activity

### Annex A: Glossary of terms





## Annex A: glossary of terms

**Complaint case:** A single complaint case may have one or more allegations attached to it, made by one or more complainants, against one or more persons serving with the police.

**Allegation:** An allegation may concern the conduct of a person or persons serving with the police or the direction and control of a police force. It is made by someone defined as a complainant under the Police Reform Act 2002 (see 'complainant' below). An allegation may be made by one or more complainants. A complaint case may contain one or many allegations. For example, a person may allege that they were pushed by an officer and that the officer was rude to them. This would be recorded as two separate allegations forming one complaint case. An allegation is recorded against an allegation category.

**Direction and control:** The IPCC considers the term 'direction and control' to mean general decisions about how a force is run, as opposed to the day-to-day decisions or actions of persons serving with the police, which affect individual members of the public – including those that affect more than one individual.

**Local resolution:** For less serious complaints, such as rudeness or incivility, the complaint may be dealt with by local resolution. Local resolution is a flexible process that can be adapted to the needs of the complainant. A local police supervisor deals with the complaint, which might involve providing an explanation or information; an apology on behalf of the force; providing a written explanation of the circumstances and any action taken; or resolving the complaint over the counter or by telephone.

**Investigation:** If a complaint is not suitable for local resolution, it must be investigated. This involves the appointment of an investigating officer who will investigate the

complaint and produce a report detailing the findings about each allegation and any action to be taken as a result of the investigation. There are two different types of investigation referred to in the report:

- **Local investigations:** Are carried out entirely by the police. Complainants have a right of appeal to the relevant appeal body following a local investigation.
- **Supervised investigations:** Are carried out by the police under their own direction and control. The IPCC sets out what the investigation should look at (which is referred to as the investigation's 'terms of reference') and will receive the investigation report when it is complete. Complainants have a right of appeal to the IPCC following a supervised investigation.

**Disapplication:** Disapplication only applies to allegations linked to complaint cases received on or after 22 November 2012.

A full list of the allegation categories available and their definitions can be found in the IPCC's Guidance on the recording of complaints. There are certain circumstances in which a complaint that has been recorded by a police force does not have to be dealt with under the Police Reform Act 2002 (PRA 2002). For allegations linked to complaint cases received on or after 22 November 2012, this is called disapplication. It can only happen if certain circumstances apply:

- If more than 12 months have passed between the incident, or the latest incident, giving rise to the complaint and the making of the complaint and either no good reason for the delay has been shown or injustice would be likely to be caused by the delay.
- If the matter is already subject of a complaint made by or on behalf of the same complainant.
- If the complainant discloses neither their

name and address nor that of any other interested person and it is not reasonably practicable to ascertain these.

- If the complaint is repetitious.
- If the complaint is vexatious, oppressive or otherwise an abuse of the procedures for dealing with complaints.
- If it is not reasonably practicable to complete the investigation or any other procedures under the PRA 2002.

If the complaint was not required to be referred to the IPCC, the police force can carry out a disapplication. If the complaint was referred to the IPCC and the IPCC has either referred the complaint back to the force or determined the form of investigation, the force must apply to the IPCC for permission to carry out the disapplication.

**Dispensation:** Dispensation only applies to allegations linked to complaint cases received before 22 November 2012.

There are certain circumstances in which a complaint that has been recorded by a police force does not have to be dealt under the Police Reform Act 2002 (PRA 2002). For allegations linked to complaint cases received before 22 November 2012, this is called dispensation. It can only happen if certain circumstances apply:

- If more than 12 months have passed between the incident, or the latest incident, giving rise to the complaint and the making of the complaint and either no good reason for the delay has been shown or injustice would be likely to be caused by the delay.
- If the matter is already subject of a complaint made by the same complainant.
- If the complainant discloses neither their name and address nor that of any other interested person and it is not reasonably practicable to ascertain these.

- If the complaint is repetitious.
- If the complaint is vexatious, oppressive or otherwise an abuse of the procedures for dealing with complaints.
- If it is not reasonably practicable to investigate the complaint.

**Discontinuance:** A discontinuance ends an ongoing investigation into a complaint. It can only occur if certain circumstances apply:

- If a complainant refuses to co-operate to the extent it is not reasonably practicable to continue with the investigation.
- If the force decides the complaint is suitable for local resolution.
- If the complaint is repetitious.
- If the complaint is vexatious, oppressive or otherwise an abuse of the procedures for dealing with complaints.
- If it is not reasonably practicable to proceed with the investigation.

If the complaint was not required to be referred to the IPCC, the police force can discontinue a local investigation; otherwise, they must apply to the IPCC for permission to discontinue the investigation. In the case of a supervised investigation, the police force has to apply to the IPCC for permission to discontinue the investigation.

**Withdrawn:** A complainant may decide to withdraw one or more allegations in their complaint or that they wish no further action to be taken in relation to their allegation/complaint. In this case, no further action may be taken with regard to the allegation/complaint.

**Investigation outcomes:**

- Unsubstantiated / Substantiated: These are the outcomes of allegations that have been judged solely in terms of whether

evidence of misconduct was found. This outcome will only apply to allegations linked to complaint cases recorded before 1 April 2010. As time progresses there will be fewer allegations with these outcomes.

• **Not upheld / Upheld:** As of 1 April 2010, police forces are expected to also record whether a complaint is upheld or not upheld. A complaint will be upheld if the service or conduct complained about does not reach the standard a reasonable person could expect. This means that the outcome is not solely linked to proving misconduct.

**Sub judice:** After recording a complaint, the investigation or other procedure for dealing with the complaint may be suspended because the matter is considered to be sub judice. This is when continuing the investigation / other procedure would prejudice a criminal investigation or criminal proceedings. There are a number of factors police forces should consider when deciding whether a suspension is appropriate. The complainant must be notified in writing when the investigation / other procedure into their complaint is suspended and provided with an explanation for the decision. A complainant has the right to ask the IPCC to review that decision.

**Chief officer:** 'Chief officer' is a collective term that refers to the heads of police forces (chief constables for all forces except the Metropolitan Police and City of London Police, which are each headed by a commissioner).

**Non-recording appeal:** Under the Police Reform Act 2002, the police have a duty to record all complaints about the conduct of a serving member of the police or the direction and control of a police force.

Complainants have the right to appeal to the IPCC in relation to the non-recording of their complaint on a number of grounds. These are set out in the 'findings' section of the report. The appeal right in relation to direction and control complaints is limited; full details can

be found in the IPCC's Statutory Guidance.

**Investigation appeal:** This applies to all complaints investigated by the police force itself or where the investigation has been supervised by the IPCC. The complainant may appeal to the relevant appeal body on a number of grounds in relation to the investigation, which are set out in the 'findings' section of the report. There is no right of appeal in relation to the investigation of a direction and control complaint.

**Local resolution appeal:** Complainants are entitled to appeal to the relevant appeal body against the outcome of a local resolution. There is no right of appeal where the complaint locally resolved relates to direction and control.

**Disapplication appeal:** An appeal may be made to the relevant appeal body against the decision to disapply the requirements of the Police Reform Act 2002. There is no right of appeal where the complaint subject to the disapplication relates to direction and control or where the IPCC has given permission for the disapplication.

**Discontinuance appeal:** An appeal may be made to the relevant appeal body against the decision by a police force to discontinue the investigation into a complaint. There is no right of appeal where the complaint subject of the investigation discontinued relates to direction and control, where the IPCC has given permission for the discontinuance or if the discontinuance is carried out by the IPCC in relation to a supervised investigation.

**Invalid appeals:** There are a number of reasons why an appeal may be judged to be invalid. These are:

- If the appeal is not complete. An appeal must be in writing and contain certain information such as the details of the complaint, the name of the police force whose decision is subject of the appeal and the grounds of appeal, although the relevant appeal body may still consider an appeal even if it does not consider the

appeal complete.

- If there is no right of appeal. Only a complainant or someone acting on his or her behalf can make an appeal. If anyone else tries to, the appeal is invalid. An appeal must also follow a final decision in relation to a complaint from the force (or, in the case of non-recording where no decision has been made, at least 15 working days must have passed between the complainant making their complaint and submitting an appeal against the non-recording of that complaint).
- If the appeal is made more than 28 days after the date of the letter from the police force giving notification of the decision (which is capable of appeal) to the complainant and there are no special circumstances to justify the delay. The right of appeal in relation to direction and control complaints is limited, as noted in the definition for each appeal type above; full details can be found in the IPCC's Statutory guidance.

**Complainants:** Under the Police Reform Act 2002, a complaint may be made by:

- a member of the public who claims that the conduct took place in relation to them
- a member of the public who claims they have been 'adversely affected' by the conduct, even though it did not take place in relation to them
- a member of the public who claims to have witnessed the conduct
- a person acting on behalf of someone who falls within any of the three categories above. This person would be classed as an 'agent' or 'representative' and must have the written permission of the complainant to act on their behalf. A person is 'adversely affected' if they suffer distress or inconvenience, loss or damage, or are put in danger or at risk by the conduct complained of. This might apply, for example,

to other people present at the incident, or to the parent of a child or young person, or a friend of the person directly affected. It does not include someone distressed by watching an incident on television.

A 'witness' is defined as someone who gained their knowledge of that conduct in a way that would make them a competent witness capable of giving admissible evidence of that conduct in criminal proceedings or has anything in their possession or control that would be admissible evidence in criminal proceedings.

One complaint case can have multiple complainants attached to it and one individual can make more than one complaint within the reporting year.

**Subjects:** Under the Police Reform Act 2002 (PRA 2002), complaints can be made about persons serving with the police as follows:

- police officers of any rank
- police staff, including community support officers and traffic wardens
- special constables

Complaints can also be made about contracted staff who are designated under section 39 of the PRA 2002 as a detention officer or escort officer by a chief officer.

**Misconduct:** A breach of the Standards of Professional Behaviour

**Gross Misconduct:** A breach of the Standards of Professional Behaviour so serious that dismissal would be justified

**Management Action:** A way to deal with issues of misconduct other than by formal action. They can include improvement plans agreed with officers involved.

**Misconduct Meeting:** A type of formal misconduct proceeding for cases where there is a case to answer in respect of misconduct, and where the maximum outcome would be a final written warning.

**UNIFI:** City of London Crime and Intelligence Database

**Misconduct Hearing:** A type of formal misconduct proceeding for cases where there is a case to answer in respect of gross misconduct or where the police officer has a live final written warning and there is a case to answer in the case of a further act of misconduct. The maximum outcome at a Misconduct Hearing would be dismissal from the Police Service.

**Unsatisfactory Performance Procedures**

**(UPP):** Procedures which are available to deal with performance and attendance issues. They are not, as such, dealt with by Professional Standards, but by the Force's Human Resources Department.

**Police Terminology**

**DSI:** Death or Serious Injury

**SIO:** Senior Investigating Officer

**MPS:** Metropolitan Police Service

**DPS:** Directorate Professional Standards  
(Metropolitan Police Service)

**TFG:** Tactical Firearms Group

**MIT:** Major Investigation Team

**NFA:** No Further Action

**UPD:** Unformed Policing Directorate

**ECD:** Economic Crime Directorate

**I&I:** Intelligence and Information Directorate

**PNC:** Police National Computer

**ANPR:** Automatic Number Plate Recognition

