



Professional Standards and Integrity Sub (Police) Committee

Date: MONDAY, 5 MARCH 2018

Time: 2.30 pm

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

Members: Alderman Alison Gowman (Chairman)
Deputy Douglas Barrow (Ex-Officio Member)
Nicholas Bensted-Smith
Tijs Broeke
Mia Campbell
Deputy Richard Regan
Lucy Sandford (External Member)
Deputy James Thomson (Ex-Officio Member)
James Tumbridge

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Next Meetings:

6 June 2018

17 Sep 2018

7 Dec 2018

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 1 December 2017

For Decision
(Pages 1 - 6)
4. **OUTSTANDING REFERENCES**
Report of the Town Clerk

For Information
(Pages 7 - 10)
5. **BODY WORN VIDEO (BWV) DEMONSTRATION**
Chief Superintendent of City of London Police to be heard

For Information
6. **HANDCUFFING OF JUVENILE STATISTICS**
Report of the Commissioner of Police

For Information
(Pages 11 - 14)
7. **CHANGES TO THE COMPLAINTS APPEALS PROCESS**
Report of the Town Clerk

For Information
(Pages 15 - 18)
8. **STAFF SURVEY UPDATE**
Report of the Commissioner of Police

For Information
(Pages 19 - 54)
9. **HMICFRS PEEL LEGITIMACY INSPECTION 2017**
Report of the Commissioner of Police

For Information
(Pages 55 - 66)

10. **INTEGRITY DASHBOARD AND CODE OF ETHICS UPDATE**
Report of the Commissioner of Police
- For Information**
(Pages 67 - 76)
11. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**
12. **ANY OTHER BUSINESS**
13. **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 I of Schedule 12A of the Local Government Act.
- For Decision**

Part II - Non-Public Agenda

14. **NON-PUBLIC MINUTES**
To agree the non-public minutes from the last meeting, held on 1 December 2017
- For Decision**
(Pages 77 - 82)
15. **NON-PUBLIC OUTSTANDING REFERENCES**
Report of the Town Clerk
- For Information**
(Pages 83 - 84)
16. **PROFESSIONAL STANDARDS STATISTICS Q3**
Report of the Commissioner of Police
- For Information**
(Pages 85 - 112)
17. **MISCONDUCT HEARINGS**
Report of the Commissioner of Police
- For Information**
(Pages 113 - 116)
18. **CASE TO ANSWER / UPHELD**
Report of the Commissioner of Police
- For Information**
(Pages 117 - 122)

19. **NO CASE TO ANSWER / NOT UPHELD**

Report of the Commissioner of Police

For Information
(Pages 123 - 148)

20. **LOCAL RESOLUTIONS**

Report of the Commissioner of Police

For Information
(Pages 149 - 166)

21. **POLICE COMPLAINTS INFORMATION BULLETIN Q3**

For Information
(Pages 167 - 180)

22. **GLOSSARY OF TERMS**

Report of the Commissioner of Police

For Information
(Pages 181 - 186)

23. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE
SUB-COMMITTEE**

24. **ANY OTHER NON-PUBLIC BUSINESS**

PROFESSIONAL STANDARDS AND INTEGRITY SUB (POLICE) COMMITTEE

Friday, 1 December 2017

Minutes of the meeting of the Professional Standards and Integrity Sub (Police) Committee held at the Guildhall EC2 at 11.00 am

Present

Members:

Alderman Alison Gowman (Chairman)	Lucy Sandford (External Member)
Nicholas Bensted-Smith	James Tumbridge
Mia Campbell (External Member)	

Officers:

Oliver Bolton	-	Town Clerk's Department
George Fraser	-	Town Clerk's Department
Stuart Phoenix	-	Head of Strategic Development, CoLP
Alistair Sutherland	-	Assistant Commissioner, CoLP
Maria Woodall	-	Director of Professional Standards, CoLP

1. APOLOGIES

Apologies were received from Deputy Doug Barrow, Tijs Broeke and Deputy James Thomson.

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

The Sub-Committee considered the public minutes from the last meeting, held on 22 September 2017.

RESOLVED – That the minutes be approved.

4. OUTSTANDING REFERENCES

The Sub-Committee received a report of the Town Clerk that summarised the outstanding actions from previous meetings.

OR1 – Agenda Packs

The Sub-Committee discussed the proposition of reducing the security marking of future Professional Standards and Integrity Sub-Committee agenda standard items from “Confidential” to “Non-Public”. It was agreed that since the evolution of the case summaries significantly reduced the incidence of sensitive information, the standing content of the agendas should be taken into consideration by the Professional Standards Department of CoLP to be marked

safely as “Non-Public”. It was agreed that this would both improve transparency, and improve timeliness and ease of access for Members to read reports ahead of meetings. The new marking would enable the Town Clerk to post agenda packs directly to attendees, as well as circulate them digitally via email. The Director of Professional Standards confirmed that she was going to have a meeting with her predecessor on 4 December to discuss any possible security implications this would pose for CoLP, with a sight to confirming the change ahead of the publication of the agenda for the next meeting on 5 March 2018. (1) A Member noted the omission of ethnicity of the complainants since the revision of the Case and Complaints report to the summarised version.

OR2 – Staff Survey Report

The Chairman requested that the further Staff Survey update coming to Police Committee on 15 December be circulated to all Sub-Committee members not on the Grand Committee. (2)

OR3 – London Police Challenge Forum Minutes

The Head of Strategic Development explained that the minutes that were expected to have been signed off and circulated before the end of November, had not yet been released. The Assistant Commissioner confirmed that he would be in contact with the Metropolitan Police Service (MPS) in the week commencing 4 December when he would enquire regarding their approval for release. (3)

OR4 – London Police Challenge Forum Date

A Member enquired about the attendance of the meeting, and the Head of Strategic Development confirmed that representatives of the MPS, British Transport Police Authority (BTPA) and CoLP would be present. He also suggested that any Members who wish to attend would be most welcome to request an invite from him. Two Members requested invites.

OR7 – Gifts and Hospitality Report

The Head of Strategic Development clarified that the report had been published online, but that the issue was surrounding its clear location on the website. The Director of Professional Standards explained that wider updates to the website would be occurring in April 2018, and this would be actioned as part of this process. (4)

The Chairman noted that in previous meetings there had been discussion of a Body Worn Video (BWV) demonstration taking place at a future meeting. The Assistant Commissioner explained that this could be arranged for the next meeting if desired. It was requested that this be added to the Outstanding References. (5)

RESOLVED – That the report be received.

5. INTEGRITY DASHBOARD AND CODE OF ETHICS UPDATE

The Sub-Committee received a report of the Commissioner of Police that provided Members with information on the submitted reports at Item 6 and Item 7; *Q2 Integrity Dashboard and Code of Ethics Update*.

The Head of Strategic Development explained that the Integrity Standards Board (ISB) met on 30 November, one day before this Sub-Committee, and so would verbally update Members.

The Head of Strategic Development explained that there were no major concerning trends to note. There were some small issues such as those related to internal telephones. He explained that NICHE system issues were discussed, and that NCRS audits were ongoing, with none raising any Professional Standards & Integrity concerns in 2017.

The Head of Strategic Development explained that the London Police Challenge Forum (LPCF) which operated nationally, had now moved towards division into regional panels. All three London Forces opted to be part of the West of England/Wales regional panel, which was chaired by a highly regarded panel chair based in Bath. He explained that national policy debate was to a significant extent informed by these panels. There had been three panels held so far, with no MPS representative and just one CoLP representative raising an issue. He explained that there was an urge for CoLP to better utilise their representatives at these panels moving forward. To this end, the plan would be to have a re-launch in January 2018, taking on board the learning to date around communications.

In reference to paragraph 11 of the report, the Head of Strategic Development explained that any issues raised by Force Crime and Incident Registrar (FCIR) audits would be sent to the Integrity Standards Board. He clarified that CoLP protocol dictates that recording methods always undergo a risk assessment. He emphasised that it was important that issues which are not problematic remain presented as correctly, and are recorded accurately.

The Chairman enquired as to the status of PEEL reports. The Head of Strategic Development explained that the Efficiency & Legitimacy inspection took place, but that the report publication had been delayed a number of times by HMICFRS. The latest date given was 12 December, and although CoLP are working on actions based on a draft issued, until final publication it is unavailable for circulation. The Chairman stated that reports published relating to Professional Standards & Integrity issues should be submitted to this Sub-Committee, as well as the Performance and Resource Management Sub-Committee as standard practice. The Chairman requested a draft copy of the report on leadership for the next meeting. (6)

The Head of Strategic Development notified Members that in 2018 "PEEL" would be retitled "Integrated PEEL Assessment".

The Head of Strategic Development explained that from 2018 onwards, with one inspection likely taking place in Autumn planned so far, would be informed by the CoLP "Force Management Statement". He explained that it was not yet fully clear how the Statement would translate into the inspection criteria. The Chairman noted that it may prove difficult to compare and contrast with previous inspection reports.

RESOLVED – That the report be received.

6. **Q2 INTEGRITY DASHBOARD**

The Sub-Committee received a report of the Commissioner of Police that summarised the data measuring the CoLP's Integrity in Q2 of 2017-18.

The Chairman noted that **Measure 7 – Number of PSD investigations principally arising from the use of force** recorded “-“ rather than “0” for Q2, which was misleading as it could be perceived to have not been recorded.

The Chairman noted that **Measure 15 – Number of procurement purchases assessed by PSD for investigation** jumped from “1” to “2” in Q2, and yet there was only a single recorded in all of 2016. The Head of Strategic Development explained that reporting had improved significantly and this should give increased confidence in its accuracy.

A Member enquired whether the “0” figures for **Measure 14 – Number of management issues arising from re-vetting of the workforce** were accurate for Q1 and Q2. The Head of Strategic Development explained that many of the processes are not yet marked as complete due to the lengthy nature of processing the forms and financial data. However, he reassured Members that increased efforts in following up by HR have cleared a significant amount of the backlog that existed.

RESOLVED – That the report be received.

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

The Sub-Committee received a report of the Commissioner of Police that provided updates on the Police Integrity Development and Delivery Plan.

The Head of Strategic Development explained that there were two “AMBER” measures outstanding:

1.5 To define the Force approach to corruption within appropriate Standard Operating Procedures and supporting statements would be completed as soon as possible.

1.6 To have established a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates) would be completed in April 2018 with the updating of the website. (7)

The Chairman enquired as to the release of the next Professional Standards Newsletter, and the Head of Strategic Development confirmed that it would likely be signed off by the Assistant Commissioner to be circulated in the week or two following this meeting.

A Member enquired as to the status of the Senior Leadership Team. The Head of Strategic Development explained that it was addressed in the Staff Survey plan for 2018. The Assistant Commissioner confirmed that a selection process

had just been run for 4 internal and 1 external individuals to fill temporary roles. He confirmed that all current temporary staff had been encouraged to apply for the formal assessment process. The Chairman illustrated concerns over staff remaining in temporary roles for long periods of time. A Member asked if the updated information would be circulated outside of the CoLP, as there is a security risk if individuals attempt to contact those no longer in post because they have not been made aware of the changes. The Assistant Commissioner confirmed that CoLP would provide an update on Force leadership changes following their meeting on 6 December. (8)

8. **QUESTIONS RELATING TO THE WORK OF THE SUB-COMMITTEE**

A Member explained that the National Association of Legally Qualified Chairpersons for Police Misconduct Panels had recently been formed, to which they were a member, and noted that there were no CoLP representatives present. The Assistant Commissioner confirmed that the CoLP were aware of the Panel, and would seek to engage with it. (9)

a) **Any other business that the Chairman considers urgent**

There was no other business.

9. **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.

10. **CONFIDENTIAL MINUTES**

The Sub-Committee considered the confidential minutes from the last meeting, held on 22 September 2017.

RESOLVED – That the confidential minutes from the last meeting be approved.

a) **Confidential Outstanding References**

The Sub-Committee received a report of the Town Clerk that summarised the confidential outstanding actions from previous meetings.

RESOLVED – That the report be received.

11. **Q2 STATISTICAL INFORMATION**

The Committee received a report of the Commissioner of Police that summarised statistical information regarding professional standards and integrity measures over the last Quarter.

RESOLVED – That the report be received.

12. **CONDUCT AND COMPLAINT CASES**

The Sub-Committee received a report of the Commissioner of Police that detailed complaint investigations of the Professional Standards Department in the last period.

13. **CASE TO ANSWER, UPHELD**
The Sub-Committee discussed case complaint summaries for cases in which the complaints were upheld.
14. **NO CASE TO ANSWER, NOT UPHELD**
The Sub-Committee discussed case complaint summaries for cases in which the complaints were not upheld.
15. **LOCAL RESOLUTION**
The Sub-Committee discussed case complaint summaries for cases in which a local resolution was found.
16. **IPCC REPORTS BULLETIN**
The Sub-Committee received a report of the Commissioner of Police that summarised the IPCC Police Complaints Bulletin for the period 1 April - 30 September 2017.

RESOLVED – That the report be received.
17. **GLOSSARY OF TERMS**
The Sub-Committee received a report of the Commissioner of Police that provided a glossary of terms used by the Professional Standards Department.

RESOLVED – That the report be received.
18. **CONFIDENTIAL QUESTIONS RELATING TO THE WORK OF THE COMMITTEE**
There were no further questions.
19. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT WHILST THE PUBLIC ARE EXCLUDED**
There was no further business.

The meeting closed at 1.00 pm

Chairman

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PROFESSIONAL STANDARDS & INTEGRITY SUB (POLICE) COMMITTEE

5 MARCH 2018

OUTSTANDING REFERENCES

No.	Meeting Date & Reference	Action	Owner	Status
1.	<p>01/12/17 Item 4 - <i>Outstanding References</i></p> <p>22/09/17 Item 3 - <i>Matters Arising</i></p> <p>Agenda Packs</p>	<p>The Sub-Committee discussed the proposition of reducing the security marking of future Professional Standards and Integrity Sub-Committee agenda standard items from “Confidential” to “Non-Public”.</p> <p>Update 23-02-18: This has now been confirmed and established. “Non-public” minutes will be circulated in the Police Grand Committee agenda. “Confidential” reports may still be submitted on an ad-hoc basis as required.</p>	CoLP/ Town Clerk	COMPLETE
2.	<p>01/12/17 Item 4 - <i>Outstanding References</i></p> <p>22/09/17 (2) Item 4 - <i>Integrity Dashboard & Code of Ethics Update</i></p> <p>Staff Survey Report</p>	<p>The Chairman requested that the further Staff Survey update coming to Police Committee on 15 December be circulated to all Sub-Committee members not on the Grand Committee.</p> <p>Update 15-12-18: At the Police Committee meeting on 15 December, the Chairman of the Professional Standards and Integrity Sub Committee confirmed that, although a presentation of the Staff Survey report methodology would not be necessary at the next Police Committee meeting, it would be useful to see a full explanation of measures at the next meeting of the Professional Standards and Integrity Sub-Committee.</p>	CoLP	DUE MARCH 2018

3.	<p>01/12/17 Item 4 - <i>Outstanding References</i></p> <p>22/09/17 (3) Item 4 - <i>Integrity Dashboard & Code of Ethics Update</i></p> <p>London Police Challenge Forum Minutes</p>	<p>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.</p> <p>Update 01-12-17: The Head of Strategic Development explained that the minutes that were expected to have been signed off and circulated before the end of November, had not yet been released. The Assistant Commissioner confirmed that he would be in contact with the Metropolitan Police Service (MPS) in the week commencing 4 December when he would enquire regarding their approval for release.</p>	CoLP	OUTSTANDING
4.	<p>01/12/17 Item 4 - <i>Outstanding References</i></p> <p>22/09/17 (7) Item 4b - <i>Police Integrity Development and Delivery Plan Report 2016-17</i></p> <p>Gifts & Hospitality report</p>	<p>The Gifts & Hospitality report to be published and made clearly visible on the CoLP website.</p> <p>Update 01-12-17: The Head of Strategic Development clarified that the report had been published online, but that the issue was surrounding its clear location on the website. The Director of Professional Standards explained that wider updates to the website would be occurring in April 2018, and this would be actioned as part of this process.</p>	CoLP	DUE APRIL 2018
5.	<p>01/12/17 Item 4 - <i>Outstanding References</i></p> <p>Body Worn Video (BWV) Demonstration</p>	<p>The Chairman noted that in previous meetings there had been discussion of a Body Worn Video (BWV) demonstration taking place at a future meeting. The Assistant Commissioner explained that this could be arranged for the next meeting if desired. It was requested that this be added to the Outstanding References.</p>	CoLP/ Town Clerk	DUE MARCH 2018

6.	01/12/17 Item 5 - <i>Integrity Dashboard and Code of Ethics Update</i> Reports Submission to Sub-Committees	The Chairman stated that reports published relating to Professional Standards & Integrity issues should be submitted to this Sub-Committee, as well as the Performance and Resource Management Sub-Committee as standard practice. The Chairman requested a draft copy of the legitimacy report for the next meeting.	CoLP	COMPLETE – On the agenda
7.	01/12/17 Item 7 - <i>Integrity Development and Delivery Plan Report 2016-17 (Nov 17 Update)</i> LPCF participation process	To have established a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates) would be completed in April 2018 with the updating of the website.	CoLP	DUE APRIL 2018
8.	01/12/17 Item 7 - <i>Integrity Development and Delivery Plan Report 2016-17 (Nov 17 Update)</i> Force Leadership Changes Update	A Member asked if the updated information would be circulated outside of the CoLP, as there is a security risk if individuals attempt to contact those no longer in post because they have not been made aware of the changes. The Assistant Commissioner confirmed that CoLP would provide an update on Force leadership changes following their meeting on 6 December.	CoLP	OUTSTANDING
9.	01/12/17 Item 8a - <i>Questions relating to the work of the Sub-Committee</i> National Association of Legally Qualified Chairpersons for Police Misconduct Panels	A Member explained that the National Association of Legally Qualified Chairpersons for Police Misconduct Panels had recently been formed, to which they were a member, and noted that there were no CoLP representatives present. The Assistant Commissioner confirmed that the CoLP were aware of the Panel, and would seek to engage with it.	CoLP	OUTSTANDING

10.	<p>05/06/17 Item 12 - <i>Integrity Dashboard & Code of Ethics update</i> 01/03/17</p> <p>Staff Survey Indicators on Dashboard</p>	<p>Commissioner to include Staff Survey indicators on future dashboard updates</p> <p>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.</p> <p>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.</p>	CoLP	<p>ONGOING –</p> <p>Update received 16/11/17</p>
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NOT PROTECTIVELY MARKED

Committees	Dated:
Police Committee Safeguarding Sub-Committee Professional Standards and Integrity Sub-Committee	25 January 2018 6 February 2018 5 March 2018
Subject: Handcuffing of Juvenile Statistics	Public
Report of: The Commissioner of Police	For Information
Report author: Detective Superintendent Woodall	

Summary

This paper aims to address concerns raised following submission of a paper to Police Committee and Safeguarding Sub-Committee that the City of London Police were using excessive force on juveniles when compared to other forces (specifically the MPS and Cambridgeshire).

The figures previously presented actually showed different things and should not have been directly compared. Further comparable data has been acquired and presented in this report that demonstrates CoLP is performing in line with these other forces. In addition, dip-sampling of City Use of Force forms has shown no issues of concern and no complaints have been received in relation to the use of force on juveniles in the City.

Recommendation

Members are asked to note the report.

Main Report

Background

1. The Annual update on the Custody of Vulnerable Persons (Young Persons, Children and Mental Health) was given to Police Committee on 21st September 2017 and Safeguarding Sub-Committee on 27th September 2017.
2. Within that report at paragraph 33 the following information was detailed: "So far for the months of April to June of 19 individuals under 18 brought into custody, 12 have been handcuffed, this equates to 63%. As a comparison during the same period, 8% of all juveniles' arrests made by Cambridgeshire Police and 13% of all

juvenile arrests made by the Metropolitan Police service (MPS) show use of Force applied”

Current Position

- 3. The data from Cambridgeshire and the MPS used in paragraph 2 above was extracted from their external website and should not have been used as it was a wrong comparison. The City of London Police (CoLP) statistics quoted refer to the percentage of those arrested under 18 who were handcuffed and the MPS and Cambridge is a percentage of the total use of Force applied to under 17 year olds as compared with the use of Force on all persons detained.
- 4. Use of Force statistics will include handcuffing but is wider, including baton use.
- 5. Handcuffing statistics should detail compliant and non compliant handcuffing which is not shown within the original statistics at paragraph 2.
- 6. The MPS report the Use of Force on 12,605 people and 1,593 in the 11 to 17 year age bracket (13%).
- 7. CoLP’s external website reports handcuffing on 405 people and 29 in the 16yrs and under age bracket (7%); 33 in the 17yrs to 20yrs age bracket (8%).
- 8. The figures for handcuffing young people in the City of London police as shown at paragraph 7 above (and Table 1 below) are not out of line with the figures presented by Cambridgeshire and the MPS for their use of force.
- 9. Table 1 below attempts to demonstrate the comparison between the three forces. However, this is hampered by the different type of data and the fact that CoLP figures are broken down by different age brackets than MPS. In addition, MPS and Cambs are reporting Use of Force (which includes use of Handcuffs - and also baton use and physical restraint) and CoLP figures report just the use of handcuffs specifically. Figures for each force, with their own age brackets, can be found in Appendix A.

Table 1: Use of force/handcuffs broken down proportionally by age for MPS, Cambs and CoLP.

Age*	MPS	CAMBS	COLP
0-16/17	12.8%	7.8%	7.2%
17/18-34/35	57.2%	61.6%	62.7%
35/36-50/51	22.7%	23.3%	18.8%
50/51 - 64/65	6.6%	6.4%	4.0%
65/66 +	0.7%	0.6%	7.4%
Not known / recorded		0.4%	
Total	100.0%	100.0%	100.0%

* CoLP uses different age brackets than MPS and Cambs so a precise comparison is not possible. Hence, slightly overlapping age ranges in this table.

10. It should be noted that Superintendent Bill Duffy has undertaken some dip-sampling on the Use of Force Forms for juveniles in the City and has found no instances of improper use of force. Further to this, no complaints have been received by CoLP for use of force on juveniles.

Conclusion

11. While it was regrettable that figures previously presented were wrong to compare, it is hoped the figures presented above allay any concerns that CoLP may be using excessive force on juveniles (in comparison to MPS and Cambs).

Appendices

- Appendix 1 – Individual force figures for MPS, Cambridgeshire and City of London.

Background Papers

Annual update on the Custody of Vulnerable Persons (Young Persons, Children and Mental Health), presented to Police Committee (21st September) and Safeguarding Sub-Committee (27th September 2017).

Detective Superintendent Maria Woodall

Head of Professional Standards Directorate

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Use of Force / Handcuffs broken down by age for Metropolitan Police Service, Cambridgeshire Constabulary and City of London Police.

MPS - Q1 2017-18		
Age	Total individuals	% of total
0-10	17	0.1%
11-17	1593	12.6%
18-34	7213	57.2%
35-49	2864	22.7%
50-64	830	6.6%
65 +	88	0.7%
Total	12605	100.0%

CAMBS - Jul 2017 to Sept 2017		
Age	Total individuals	% of total
0-10	5	0.4%
11-17	85	7.3%
18-34	714	61.6%
35-49	270	23.3%
50-64	74	6.4%
65 +	7	0.6%
Not known / Recorded	5	0.4%
total	1160	100.0%

COLP - April-Sept 2017 (Q1 and Q2 combined)		
Age	Total individuals	% of total
0-16	29	7.2%
17-20	33	8.1%
21-25	106	26.2%
26-30	58	14.3%
31-35	57	14.1%
36-40	35	8.6%
41-45	28	6.9%
46-50	13	3.2%
51-55	7	1.7%
56-60	6	1.5%
61-65	3	0.7%
66 +	30	7.4%
Total	405	100.0%

Committee: Professional Standards & Integrity Sub (Police) Committee	Dated: 5 th March 2018
Subject: Changes to the Complaints Appeals Process	Public
Report of: Town Clerk	For Information
Report author: Oliver Bolton, Police Authority, Town Clerk's	

Summary

This report aims to inform members about the reforms to the police complaints process being introduced by the Police and Crime Act 2017. It highlights the mandatory changes which will affect PCCs/Authorities (namely that they will become the appellant body for complainants) and the additional options that they may like to consider (principally around engagement with the complainant through the complaints process).

Futhermore, it suggests that given the high performance of the Force in this area and in-line with nearly every other force in England and Wales, it is not considered necessary to implement anything other than the mandatory changes imposed by the Act.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. Following the Chapman Review in December 2014, the Home Office launched a consultation: *Improving Police Integrity*. This led to proposals to simplify and improve the police complaints process with provisions included in the Police and Crime Bill in February 2016 – which gained Royal Assent in January 2017.

Current Position

2. The aim of the changes in the Act is to deliver a system that is:
 - a) More customer focused and that resolves complaints in a timely fashion;
 - b) Less bureaucratic;
 - c) More transparent and independent with effective local oversight;
 - d) Allows for identification of patterns and trends of dissatisfaction being raised; and
 - e) Less adversarial for officers.

3. The key reforms that have been introduced to achieve these aims are:
 - a) **Definition of 'Complaint'** – Currently a complaint has to be about the conduct of an officer. This will be replaced by a broader definition: *any expression of dissatisfaction with a police force*. This covers general customer service and police practice issues, not only misconduct of an individual officer(s).
 - b) **Remove the non-recording decision** – A complaint must be formally recorded if the complainant wants it recorded or if the Local Policing Body or Chief Officer determines the complaint is to be handled in accordance with Schedule 3 to the Police Reform Act 2002. “Serious” complaints must be handled in accordance with Schedule 3.
 - c) **Resolving issues outside formal system** – Where appropriate, and the complainant agrees, a complaint can be resolved otherwise than in accordance with Schedule 3. The intention is that such complaints will still need to be “logged” or “registered” to ensure that data on **all** complaints are captured.
 - d) **Simplification** – Removing the various categories for handling a complaint (local resolution, disapplication, discontinuance etc.). These terms and concepts were found to be meaningless to the public.
 - e) **Reasonable and Proportionate** – A series of statutory duties on the force: to contact the complainant to understand how the complaint might be resolved; to take reasonable and proportionate action to resolve a complaint; to keep the complainant updated; and to inform the complainant of the outcome. In some cases, that may be to take no action. There is an obligation to investigate the matter if there is an indication that the matter is “serious”.
 - f) **Complaints Appeals** – Streamlining appeals: replacing current five appeal points with one “review” point at the outcome of a complaint.
 - g) **Police and Crime Commissioners (and Authorities)** – Increased role for PCCs/Authorities: explicit statutory duty to hold Chief Constable/Commissioner to account for complaints handling, PCC/Authority will become appellate body for appeals currently handled by Chief Officers. PCC/Authority will have options to take on certain other complaints functions.
4. It is the last of these – (Responsibilities and options for PCCs/Authorities), that will be focus of the rest of this report.
5. The latest indications from the Home Office are that these changes will come into effect in January 2019 (having previously slipped from June 2018).

Options

6. The redesignation of the Police Authority as the appellant body for appeals (to termed ‘reviews’ under the new system) from the Force, is the key change affecting PCCs/Authorities and is mandatory under the Act. The Police Authority Team in the Town Clerk’s Department is currently working with the Professional

Standards Department in the Force to identify the best way of handling this transition.

7. Within the Act, there are two further options that PCCs/Authorities may consider implementing, outlined below:
 - Taking ownership of the customer service – resolution and recording process. This would involve being the first point of contact for complainants, recording the complaint and passing it on to the force for investigation. Alternatively, it may include working with the complainant and the force, to resolve the matter locally.
 - Managing contact with the complainant throughout the process – building on the option above, PCCs/Authorities have the option of maintaining contact with the complainant and updating them on progress throughout the entire process (i.e. including while the force is running the investigation) and informing them of the outcome and their appeal right (or right of review under the new provisions).

Proposals

8. It is proposed that the City of London Police Authority continues to make provisions to accommodate the mandatory changes described above, but does not adopt the additional options outlined in paragraph 7. This is in-line with the vast majority of other force areas across England and Wales – as polled at meetings of the Association of Police and Crime Commissioners and the Association of Police and Crime Chief Executives, when the changes have been discussed.
9. A very small number of forces are considering adopting the optional provisions and it should be noted that this is generally to address serious performance issues the relevant forces have had in handling complaints.
10. As will be noted in the regular IPOC performance updates, the City of London Police consistently perform well against national comparators. In addition, unlike any other force areas, this Sub-Committee examines every single complaint made against the force – giving it a tremendous level of oversight of force decision-making in this area, which has always been commented on positively by HMICFRS. With this in mind, it is not thought necessary to adopt the wider reform options available.
11. Additionally, it is the view of the City of London Police Authority Team, and most OPCCs, that adopting responsibility for engagement with the complainant carries added complexities and risks, as the force will continue to run the investigations and the OPCC/Authority will have no authority to intervene in or direct this process.
12. As such, the only substantive change in the process for the City of London Police handling of complaints will be for the Authority to take on the role of appellant body.

Implications

13. The Town Clerk's Department is currently in discussions with the Force to draw up appropriate processes to allow for a smooth transition to the mandatory changes that the Authority will be taking on. Early indications suggest that the Police Authority Team in Town Clerk's will carry out the review of the complaint and provide a short report and recommendation for consideration by the Chairman of the Professional Standards & Integrity Sub (Police) Committee. The Chairman's decision will then be communicated back to the Complainant and the Force. However, a more detailed proposition will be submitted once a firmer idea of the new process is available.
14. As a guide, the following numbers of appeals have been handled by the force over the last three years:
- **2017-18 (to date):** Total of nine Force Appeals. Four have not been upheld, five are still being considered. There were also nine appeals against the force's decision not to record a complaint. None was upheld.
 - **2016-17:** Total of 21 Force Appeals. One was upheld; 18 were not upheld and two were not valid. There were also 15 appeals against non-recording. 13 were not upheld and two were not valid.
 - **2015-16:** Total of 11 Force Appeals. Ten were not upheld and one was not valid. There were also 21 appeals against non-recording. Four were upheld, 16 not upheld and one was not valid.

Conclusion

15. The City of London Police provide a good and timely service to those that make a complaint to the force. As such (and in line with nearly all other force areas) it is intended that the Police Authority take on no more than the mandatory changes outlined in this report.
16. A report with more detailed proposals on how police complaint appeals (to be called 'reviews' under the new system) will be handled in the City of London, will be submitted later this year.

Appendices

- None

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Agenda Item 8

Committee(s): Police Professional Standards & Integrity Sub-Committee	Date: 15 December 2017 5 March 2018
Subject: Staff Survey update	Public
Report of: Commissioner of Police Pol xx-17	For Information
Report author: Detective Chief Supt Dai Evans, Information and Intelligence Directorate	

Summary

Further to the report submitted to your September Committee which gave an overview of the Staff Survey. This report gives a more detailed update as since the last update, the full results have been received by the Force.

Members will recall, the Staff Survey was undertaken between 28th April and 5th July 2017 and was the first (for this organisation) to be conducted in collaboration with Durham University Business School. The use of an effective staff survey, accompanied by an effective review and implementation plan is part of the core inspection requirements of HM Inspectorate of Constabulary Fire and Rescue Services (HMICFRS).

The participation rate of 57% was assessed by Durham as 'outstanding' and taken overall, the results of the survey are positive.

Particular areas of note are the Pride and Engagement of staff, both of which were shown to be towards the top of comparisons with other Policing Organisations that have undertaken the survey. The other key areas highlights that CoLP has a creative and motivated workforce who feel well trained to deliver their functions.

Areas for Improvement identified included 'Hindrances Stressors', which should be interpreted as 'things or frustrations' which it is felt prevent staff from delivering to an optimal level and Ethical & Supportive Leadership- Our performance in this area is in the quartile below the mean of those organisations that have participated in the survey to date although is still at high levels. Workshops were held during late October and early November to identify specific details and examples of these issues from the five directorates. An action plan has been developed by Det. Chief Supt Dai Evans and this will report twice yearly to the Force (Strategic) Management Board. The survey will be re-visited in 18 months as advised by academic research to judge direction of travel from the baseline set this year.

Recommendation(s)

Members are asked to note the report.

Main Report

Background

1. Your Committee received an initial report regarding the Staff Survey in September 2017. This gave an outline of the process, methodology and a high level overview of some of the key findings. The full results of the Survey were not available at that time. Dr Les Graham from Durham University visited the Force on the 15th September to present the Senior Leadership Team with more detailed findings. The Staff Survey was for the first time this year conducted in partnership with academic researchers from Durham University Business School. The full results were received in Force on the 12th October 2017 and are attached at Appendix A.
2. The survey has been in use by some forces for a number of years, with Durham Police for example on their third iteration of the survey. An ever increasing number of forces now use this model for survey and whilst there are no league tables comparison amongst the data sets, forces do use it as a baseline from which to make some assumptions. Not all forces survey the same areas and as such force to force direct comparisons are discouraged as they can be significantly misleading.
3. The survey was conducted in two parts; the First and main body of the question set was available to staff between 28th April and 26th May 2017, a period of four weeks. 56.68% of the combined Police Officer and Police Staff workforce took part and by comparison with other police this has been assessed as an 'Outstanding' level of return. The second part of survey, containing far fewer questions ran between 31st May and 5th July 2017. The Force had a 31% return rate for this part which is always anticipated to be lower, but still described as an 'Excellent' response.
4. The survey and its findings are considerably different to those which the organisation has previously conducted. Using constrained fields for responses and question sets intended to test and triangulate responses, the results are a set of sentiments and feelings for the respondents as opposed to an opportunity for free text response.

Current Position- Survey Findings

5. As aforementioned, the lead academic, Dr Les Graham delivered a 'Summary of Findings' to the SLT meeting held on 15th September 2017. This highlights the significance and importance of the staff survey results for most senior leaders of the Force.
6. An additional follow up briefing is also being given to the Commissioner and Assistant Commissioner in December 2017 from Dr Graham directly.

7. Dr Graham emphasised that he saw the returns as being positive and that whilst there were inevitably some areas for improvement upon which the Force should concentrate, CoLP should be confident of the positive results and overall the figures placed the Force 'above average' when looking at the other 32 Forces in which the survey is now rolled out.
8. The CoLP results are in some ways an anomaly, whilst the majority of indicators exist in the 'above average' space, the Force score both at the highest and lowest areas of the spectrum on other indicators. This was described as unusual.
9. Key measures reported as follows:

Measure	All* Average
Job Satisfaction	4.82
Public Service Motivation	5.63
Vision Clarity	4.34
Mission Importance	5.53
Code of Ethics Values Alignment	5.85

*All measures used a 1 to 7 scale unless indicated. 1- Strongly Disagree, 2- Disagree, 3- Slightly Disagree, 4-Neither Agree nor Disagree, 5- Slightly Agree, 6- Agree, 7- Strongly Agree

9. By way of brief context, for Job Satisfaction, CoLPs combined figure of 4.82 when broken down shows that CoLP officers find more job satisfaction than CoLP Police Staff, with their figure being in the lower quartile of the 28 forces that have surveyed this area. CoLP officers and staff Public Service Motivation is high, although one department is shown as an outlier to this and this will be explored as part of the action plan going forward.
10. In the area of Vision Clarity returns placed the Force above average in terms of assessment with the 23 other forces that survey this area.
11. Findings in the Survey around the area of 'Fairness' were mixed and with this result being described by the authors as "*Procedural justice - concerns the fairness of the ways and processes used to determine the distribution of outcomes among individuals*". It is therefore pleasing to see the return being adjudged well above the comparator average. Dr Graham again stressed that Police workers generally have extremely high standards of fairness when compared with other individuals.

Measure	All* Average
Fairness	3.23

12. The City of London Police has always championed the pride its staff have and display in the discharge of their functions and the survey has only served to re-inforce that sentiment. Police Officers are feeling amongst the highest levels of pride in the country and whilst the Police Staff levels of pride exceed those of the warranted officers they are not as high in comparison with Police staff in other surveyed organisations.

Measure	All* Average
Organisational Pride	5.02

13. The high point for the CoLP return is the level of 'Engagement'. This is defined as follows:

“Engagement is a measure of an individual’s personal expression of their self in role. Someone is engaged in their work when they are able to express their authentic self and are willing to invest their personal emotional, cognitive and physical energies into their work and job roles. To do this requires then to feel that the work has meaning, that they feel safe and that they have the required resources. Improved engagement can lead to higher individual performance, enhanced well being and reduced staff turnover”.

Measure	All* Average
Engagement	5.52

14. The combined (staff and officers) score of 5.52 is one of the highest in the country and is assessed by the research team as being one of the most important and core markers for the force.

Areas for Improvement

15. Whilst the vast majority of the Force’s indicators were either neutral or positive, there are two particular areas that the Force will focus upon in terms of overall effect.

Measure	Officers (Average)	Staff (Average)
Hindrance Stressors	3.31	2.90

16. Of the 7 forces that survey this area CoLP do not compare well. The survey defines this area as. *“...Hindrance Stressors refer to work related demands, however, individuals view these demands as constraints that hinder their performance and achievements at work.....Examples of such constraints*

include role ambiguity, red tape and workplace politics, which do not provide individuals with the opportunity for personal gain and prevent achievement of valued goals”

17. In lay terms these are often ‘things’ that frustrate and annoy people, they may fester for some time and can give rise to discontent being spread amongst groups.
18. Some caution needs to be expressed around this indicator as whilst there may be strong feelings about a particular issue there may be interdependencies with for example other partners, that prevent swift resolution and as such, the Force is wary of seeking to over promise and being seen to under deliver against any particular frustration until it has fully assessed the scope and scale.
19. The second area upon which the Force is focusing improvement is Ethical and Supportive Leadership. Within the survey, respondents were asked questions with regard to their direct line supervisor / manager and as such additional analysis is required to drill down and establish if this indicator is widespread or disproportionately impacted upon by one rank to rank or grade to grade relationship.
20. Such analysis is not part of the standard returns but is considered necessary as the commentary chimes to some extent with feedback received from the Leadership Programme, in which staff feel frustrated upon return from their training by supervisor / manager support.

Measure	All* Average
Ethical Leadership	5.17
Supportive Leadership	4.85

21. Whilst both indicators are in the quartile below the mean comparison, the Force will seek, through staff engagement, to more fully understand the sentiments expressed.
22. Ethical Leadership is defined as: *“In the workplace, most individuals look outside of themselves to significant others for guidance on ethical matters. Ethical leadership can be considered as the demonstration of appropriate conduct, both in an individual’s personal actions and their interpersonal relationships. Ethical leaders promote ethical conduct to their employees through two way communication, reinforcement and decision making. Ethical leadership can be conceptualised as having three building blocks: being an ethical example, treating people fairly and actively managing morality”.*

Supportive Leadership is defined as: *“...stresses the importance of personal integrity and serving others, such as employees and communities. It focuses on the development of people to their fullest potential through an understanding of each person’s different characteristics, strengths and interests. Supportive*

leaders serve as role models, build trust and provide feedback and resources to their people. It is argued that supportive leadership combats negative outcomes associated with the promotion of self-interest which underlies many incidents of unethical behaviour”

Next Steps

23. Publishing the full results internally on the Force Intranet has been completed and is a stepping stone to enhancing accountability and transparency. The Force is committed to following up and seeking the detail upon which the next decisions can be made.
24. It was agreed that the survey needed ‘real’ examples before it could truly be considered evidence based.
25. To this end, throughout late October/ early November a number of workshops were held, led and facilitated by Organisational Development to explore more fully the issues for staff behind the areas identified as areas for improvement, including Hindrance Stressors and Ethical and Supportive Leadership.
26. The purpose of these workshops was to establish the nature, density and scale of feelings amongst staff in identification of specific examples. 93 colleagues (a mixture of police officers and police staff) from the five directorates attended the focus groups. Attendees provided detailed insights from their Directorates on some of the issues they felt were significant and made suggestions for addressing some of these. The outcomes from these workshops have been collated and shared with the Commissioner and the Senior Leadership Team including each Directorate Head. The findings have also contributed towards the content design for the Senior Leadership Team away days on the 11th and 12th December 2017 which considered areas such as leadership and cultural change in supporting the ongoing development of the Force.
27. An action plan has been developed by Det. Chief Supt Dai Evans in order to take the areas for improvement forward. The action plan will be monitored at the Force (Strategic) Management Board where it will be report twice yearly.
28. The delivery of an online platform, upon which staff can upload their commentary, has also been developed by Corporate Communications and will be launched in the New Year. The Assistant Commissioner led on-line platform for staff to air concerns will also be launched.
29. The Police Federation, Trade Union & Staff Association representatives will be actively engaged to act as ‘routes in’ for issues and concerns.
30. The survey will be re-visited in 18 months as advised by academic research to judge direction of travel. This years’ results and analysis will be used as a baseline.

Corporate & Strategic Implications

31. The completion and analysis of the Staff Survey links in with a number of CoLP Programmes and Strategies including the Leadership Programme, Talent Development Strategy and Staff Retention Strategy.

Conclusion

32. The Staff Survey is a valuable tool for the Force to detect how the workforce perceive numerous aspects of their daily working life and is an opportunity to see how we can make the most of our biggest organisational asset.....our staff.

Appendices

- Appendix A – Copy of full results and analysis of CoLP Staff Survey results

Background Papers

Pol 58-17 Staff Survey Update

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STAFF SURVEY

CITY OF LONDON POLICE

REPORT

October 2017

Dr Les Graham

Natalie Brown

Marisa Plater

Durham University Business School

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1 INTRODUCTION

City of London Police and Durham University Business School have agreed to collaborate on a research project to study the impact of workplace factors on employees and how this affects service delivery for the public. The research project was conducted by independent researchers from Durham University Business School in collaboration with personnel from City of London Police.

The aims of this study were *firstly*, to establish key measures for workplace factors, staff attitudes, motivation and well-being which can be tracked over time; and *secondly*, to investigate factors having the largest impact on key measures to assist in the identification of priorities for action.

The study has been conducted in accordance with City of London Police policy and Durham University ethical guidelines for research. Participation in the survey was voluntary, and anonymity and confidentiality for all participants is assured.

2 METHODS

The survey was designed using proven academic scales¹ for each of the measures and circulated online to employees of City of London Police using a server hosted independently by Durham Constabulary. Responses were collected in two stages: Part A from the end of April 2017, followed by Part B from the end of May 2017, with a 4 week and 5 week completion period, respectively.

In total, 628 responses were received from Part A (56.7%) and 343 responses from Part B (31.0%). This is a good response rate in comparison to what is achieved in other collaborative research.

To enable longitudinal analysis of data, respondents were asked to formulate an anonymous identification code, 76% of respondents were prepared to do this.

¹ The measures have either been developed by the research team, or are based on or adapted from peer reviewed academic scales which have been selected and tested in this context. The research team are available to discuss the measures further, as appropriate.

3 DISCUSSION OF THE KEY MEASURES

To assist in understanding the results and findings in this report, the key measures included in the survey are briefly discussed below.

3.1 Vision Clarity

Individuals were asked their opinions on how clear the organisation's vision is to them, whether it has defined objectives and whether it is easy to understand.

3.2 Mission Importance

Public sector organisations often have missions with broader scope and more profound impact on individuals' work attitudes and performance than those typically found in the private sector. If individuals view the organisation's mission as important, they tend to regard their roles as more personally meaningful and incorporate organisational goals into their work. In this study, we measure individuals' perceptions of the value of the organisation's mission.

3.3 Procedural Justice (Fairness)

Procedural justice concerns the fairness of the ways and processes used to determine the distribution of outcomes among individuals. We can think of it as individuals' perceptions of the procedural fairness of decisions made across the organisation. Procedural justice plays a key role in determining whether or not individuals link their social identity to an organisation, which in turn impacts whether individuals engage in discretionary effort for the organisation.

3.4 Perceived Organisational Support

Perceived organisational support refers to individuals' beliefs regarding the degree to which the organisation values their contributions and cares about their well-being. It also refers to a feeling of assurance that the organisation will provide support when individuals face particularly difficult or challenging circumstances when carrying out their duties. When individuals feel valued, their socioemotional needs of respect, being cared for and receiving

approval will be met, and they will reciprocate with higher levels of discretionary effort and felt obligation. Perceived organisational support is more strongly related to social exchange rather than economic exchange because it is most affected by discretionary actions by the organisation rather than as a result of external constraints such as government regulations. Perceptions of positive support from the organisation affect an individual's relationship with the organisation, and have an important impact on individuals' well-being and commitment towards the organisation.

3.5 Organisational Pride

Pride refers to an individual's evaluation of the organisation's standing, general worth and status. When individuals identify their organisation as having high status, they are more likely to have a positive social identity with the organisation. When pride is high there is increased motivation to be loyal to the organisation, its values, rules and leadership. Prior research has found a clear linkage between pride and discretionary behaviour.

3.6 Supportive Leadership

Supportive leadership stresses the importance of personal integrity and serving others, such as employees and communities. It focuses on the development of people to their fullest potential through an understanding of each person's different characteristics, strengths and interests. Supportive leaders serve as role-models, build trust and provide feedback and resources to their people. It is argued that supportive leadership combats negative outcomes associated with the promotion of self-interest which underlies many incidents of unethical behaviour.

3.7 Ethical Leadership

Ethical leaders are fair and principled decision makers who care about their people and wider society. They behave ethically in their personal and professional lives. Ethical leadership behaviour can be considered as the demonstration of appropriate conduct, both in an individual's personal actions and their interpersonal relationships. Ethical leaders promote ethical conduct to their employees through two-way communication, reinforcement and decision-making. Ethical leadership can be conceptualised as having three building blocks: being an ethical example, treating people fairly and actively managing

ethical issues. We ask employees about their views of their current immediate supervisors' leadership.

3.8 Public Service Motivation

Interest in public service motivation (PSM) has arisen from the observation that employees in the public sector behave differently from their private sector counterparts. PSM is seen as a unique attribute of public-sector employees that provides them with a desire to serve the wider community. PSM has been defined as "the motivational force that induces individuals to perform meaningful . . . public, community and social service."²

The measure comprises four key dimensions: self-sacrifice, attraction to public policy-making, commitment to the public interest or civic duty and compassion. PSM is considered a useful basis for understanding public-sector employee motivation and can be thought of as an attitude that motivates public-sector workers to display altruistic or prosocial behaviours.

3.9 Individual-Code of Ethics Values Alignment

We measured the extent to which individuals believe their own personal values align with those expressed in the Code of Ethics.

3.10 Uncertainty

We asked individuals about the level of uncertainty they perceive exists in their workplace, and how unsettled and uncertain they feel.

3.11 Job Satisfaction

Job satisfaction is simply defined as how content an individual is with his or her job. In this study, we measured a single dimension of affective job satisfaction to represent an overall emotional feeling individuals have about their job.

3.12 Engagement

Engagement is a measure of an individual's personal expression of their self-in-role. A person is engaged in their work when they are able to express their authentic self and are willing to

² Brewer and Selden (1998: 417)

invest their emotional, cognitive and physical energies into their work and job roles. To do this requires them to feel that the work has meaning, that they feel safe and that they have the necessary resources. Improved engagement can lead to higher individual performance, enhanced well-being and reduced staff turnover.

3.13 Creative Process Engagement

Creative process engagement measures the extent to which individuals engage in various actions related to creative thought processes while at work. These include identifying potential problems, researching relevant and useful information, and generating various ideas and possible solutions. Previous research has found that individuals who spend more time and effort engaging fully with a problem, thoroughly researching information and producing a greater number of alternative ideas, are more likely to identify solutions which are new, creative and useful.

3.14 Feeling Responsible for Making Changes

Feeling responsible for making changes refers to individuals feeling a personal sense of responsibility to bring about improvements and changes in the workplace, to correct problems, and deal with issues. When felt responsibility for making changes is higher, then individuals will more frequently work to make improvements to increase effectiveness and find solutions to organisational problems.

3.15 Confidence in Job Skills

Confidence in job skills measures the extent to which individuals believe they have the skills, abilities and confidence required to complete their job tasks and to perform well in their job.

3.16 Meaning of Work

We asked individuals whether they perceive their work and job activities as important and personally meaningful to them.

3.17 Feelings of Autonomy and Feelings of Being Controlled

Autonomy reflects an individual's sense of having choice in initiating and regulating work actions. It reflects independence in the initiation and continuation of work behaviours and

processes. In contrast to feelings of autonomy, when an individual experiences feelings of being controlled, they undertake their daily work activities purely due to external pressure and obligation rather than making individual choices and following individual interests.

3.18 Emotional Energy

Emotional energy, as measured in this study, is central to individuals' well-being and can be considered as the amount of emotional and mental energy individuals have available to them to meet the daily demands and challenges they face in their job. Low levels of emotional energy are manifested by both physical fatigue and a sense of feeling psychologically and emotionally 'drained' at work. Prior research has found that low emotional energy levels are related to reduced organisational commitment, lower productivity and performance, reduced engagement, ill-health, decreased physical and mental well-being, increased absenteeism and turnover intentions, and lower levels of persistence in the face of difficulties.

3.19 Challenge and Hindrance Stressors

Challenge stressors reflect individuals' perceptions of work-related demands, such as workload, time pressures, and levels of responsibility. Individuals who experience challenge stressors, although they may find them stressful, will view them as an opportunity for personal gain, such as growth and personal development or achievement of important outcomes.

Hindrance stressors also refer to work-related demands; however, individuals view these demands as constraints that hinder their performance and achievements at work. This impacts strongly on their well-being and reduces their engagement in discretionary behaviours. Examples of such constraints include role ambiguity, red tape and workplace politics, which do not provide individuals with the opportunity for personal gain and prevent achievement of valued goals.

3.20 Commitment to Change

Commitment to change can be thought of as a mind-set that binds an individual to an attitude and actions that will result in successful implementation of a change initiative. Prior

research has suggested that commitment to change is made up of three different types of commitment. **Affective commitment** occurs when the individual has a desire to support the change due to their beliefs that the change has inherent benefits. **Continuance commitment** to the change occurs when the individual recognises high costs of not providing the change or they have no choice but to go along with it. **Normative commitment** occurs when the individual feels a sense of duty or obligation to provide support for the change.

3.21 Change Discomfort

Change discomfort measures the extent to which individuals feel discomfort when they think about change within their organisation.

3.22 Extra-Mile Behaviour

Well-functioning organisations not only need people who are reliable in the way they carry out their specific roles and job requirements, but who also engage in innovative and spontaneous activity that goes beyond their role requirements; going the *extra-mile*. The research examines *extra-mile* behaviours (EMBs) targeted towards the organisation.

3.23 Ethical Voice Behaviour

Ethical voice behaviour refers to the communication between individuals and their work teams, with particular focus on integrity and ethical behaviour. This measure investigates the extent to which individuals are willing and prepared to talk to members of their work teams if they believe they are not behaving ethically or without integrity.

3.24 Innovation Behaviour

We asked individuals about the frequency they engaged in innovative behaviour at work, encapsulating not only the generation of new ideas, but also the securing of necessary resources and adequate planning for idea implementation.

3.25 Creative Behaviour

Creativity is often thought of as the ability to generate new and original ideas that are useful and appropriate considering environmental and task constraints. Individuals' creative

behaviour can be essential for problem solving, for adapting to unexpected situations and for efficiently utilising limited resources to address continuously changing demands.

4 DESCRIPTIVE RESULTS

4.1 Introduction

The descriptive statistics for measures for all respondents are presented in Table 1. The average scores for officers and staff are presented in Table 2.

Analyses to investigate whether there are any differences between scores have been conducted, and where appropriate the effect sizes of any differences have been calculated. Effect sizes can be considered as being small, medium or large. In this study we calculated values of Eta-squared and followed the guidelines proposed by Cohen (1988) for interpretation of .01 relating to a small effect, .06 to a medium effect and .14 to a large effect (Pallant, 2012). A small effect size suggests there is a real world impact, but is something likely only found through careful study. A large effect size is more substantial and indicates something that we need to take notice of. It suggests the difference between the two sets of scores is substantial and/or consistent enough that it could be found between the two populations quite easily. A medium effect, while noteworthy, is not as important as a large effect size. Discussion of the scores and differences are presented below.

4.2 Discussion of Average Scores for Key Measures

Similar to other forces, vision clarity is reported as moderate in both groups (police officers 4.21 and police staff 4.56). Police staff also scored higher for mission importance. This implies that individuals across the force, particularly police staff, believe City of London Police's mission and goals are important, and are therefore more likely to view their roles as personally meaningful.

Perceptions of fairness are reported as low by both groups, particularly police officers. However, both groups score similar to the average scores found across other forces. More positively, perceptions of organisational support are reported at encouraging levels by police officer and police staff; both groups score higher than the average found across other forces.

Table 1: Average Scores for Key Measures, All Respondents

Measure	All Respondents (Average)
Vision Clarity	4.34
Mission Importance	5.53
Procedural Justice (Fairness)	3.42
Perceived Organisational Support	4.18
Organisational Pride	5.02
Supportive Leadership	4.85
Ethical Leadership	5.17
Public Service Motivation	5.63
Individual-Code of Ethics Values Alignment	5.85
Uncertainty	4.95
Job Satisfaction	4.82
Engagement	5.52
Creative Process Engagement (1-5 scale)	3.84
Feeling Responsible for Making Changes	4.90
Confidence in Job Skills	5.56
Meaning of Work	5.58
Feelings of Autonomy	4.26
Feelings of Being Controlled	4.21
Emotional Energy	4.61
Challenge Stressors (1-5 scale)	3.81
Hindrance Stressors (1-5 scale)	3.15
Affective Commitment to Change	4.36
Continuance Commitment to Change	4.54
Normative Commitment to Change	4.77
Change Discomfort	3.78
Extra-Mile Behaviour (Organisation)	5.29
Ethical Voice Behaviour	5.63
Innovation Behaviour (1-5 scale)	3.42
Creative Behaviour (1-5 scale)	3.62

Notes:

1. All measures used a 1 to 7 scale unless stated (1 - Strongly Disagree, 2 - Disagree, 3 - Slightly Disagree, 4 - Neither Agree or Disagree, 5 - Slightly Agree, 6 - Agree, 7 - Strongly Agree).

Table 2: Comparison of Average Scores between Police Officers and Police Staff

Measure	Police Officers (Average)	Police Staff (Average)	Difference (Effect Size)
Vision Clarity	4.21	4.56	S
Mission Importance	5.40	5.72	S
Procedural Justice (Fairness)	3.23	3.74	M
Perceived Organisational Support	3.98	4.51	M
Organisational Pride	4.92	5.19	S
Supportive Leadership	4.76	5.01	S
Ethical Leadership	5.10	5.30	<i>n.s.</i>
Public Service Motivation	5.60	5.66	<i>n.s.</i>
Individual-Code of Ethics Values Alignment	5.84	5.86	<i>n.s.</i>
Uncertainty	5.20	4.59	M
Job Satisfaction	4.69	5.06	S
Engagement	5.44	5.66	S
Creative Process Engagement (1-5 scale)	3.82	3.86	<i>n.s.</i>
Feeling Responsible for Making Changes	4.82	5.05	S
Confidence in Job Skills	5.42	5.76	S
Meaning of Work	5.53	5.69	<i>n.s.</i>
Feelings of Autonomy	4.13	4.48	S
Feelings of Being Controlled	4.41	3.93	S-M
Emotional Energy	4.50	4.77	S
Challenge Stressors (1-5 scale)	3.83	3.81	<i>n.s.</i>
Hindrance Stressors (1-5 scale)	3.31	2.90	M
Affective Commitment to Change	4.15	4.69	S-M
Continuance Commitment to Change	4.73	4.23	M
Normative Commitment to Change	4.66	4.95	S
Change Discomfort	3.91	3.59	S
Extra-Mile Behaviour (Organisation)	5.51	5.48	<i>n.s.</i>
Ethical Voice Behaviour	5.96	5.72	<i>n.s.</i>
Innovation Behaviour (1-5 scale)	3.37	3.64	<i>n.s.</i>
Creative Behaviour (1-5 scale)	3.62	3.73	<i>n.s.</i>

Notes:

1. All measures used a 1 to 7 scale unless stated (1 - Strongly Disagree, 2 - Disagree, 3 - Slightly Disagree, 4 - Neither Agree or Disagree, 5 - Slightly Agree, 6 - Agree, 7 - Strongly Agree).
2. *n.s.* indicates a non-significant difference between the two groups, suggesting that while there may be a difference in average scores, it is not sufficient to be significant (i.e. it may be due to chance).
3. If the effect size is significant, it can be small (S), medium (M) or large (L).

A very positive result is that organisational pride is higher than the average in other forces, for both police officers (4.92) and police staff (5.19).

Police staff perceive encouraging levels of ethical leadership and supportive leadership; with both styles of leadership scoring above the average found across other forces. In contrast, while still at an encouraging level, police officers score lower than police staff for these two leadership measures and are also slightly below the average in comparison to other forces.

Similar to other forces, public service motivation is reported as high for both police officers and police staff (5.60 and 5.66, respectively). Police officers and police staff score above the average for individual-Code of Ethics values alignment found in other forces. This suggests that individuals at City of London Police believe their values align closely with those expressed in the Code of Ethics.

A positive finding is that, when compared to other forces, perceptions of uncertainty are reported as lower.

Moreover, a positive profile of scores were reported by police officers for job satisfaction (average score 4.69). Police staff scored encouraging levels of job satisfaction (average score 5.06).

Engagement is reported as high by police officers and staff (5.44 and 5.66, respectively). Creative process engagement is also reported as high (average score 3.84³). This suggests individuals engage in various actions related to creative thought processes while at work; including identifying potential problems, researching relevant and useful information, and generating various ideas and possible solutions.

Police staff scored higher than police officers for feeling responsible for making changes (5.05 and 4.82, respectively). This suggests individuals, particularly police staff, feel a personal sense of responsibility to bring about improvements and changes in the workplace, to correct problems, and deal with issues.

³ Measured on a 1-5 scale.

Confidence in job skills is reported higher in police staff than officers (5.76 and 5.42, respectively). This suggests individuals, particularly police staff, believe they have the skills, abilities and confidence required to complete their job tasks and to perform well in their job. Moreover, meaning of work is reported as high across the force (average score 5.58).

Feelings of autonomy are higher in police staff than police officers (4.48 and 4.13, respectively), and feelings of being controlled are higher in police officers than police staff (4.41 and 3.93, respectively).

Police officer levels of emotional energy are higher than that found in other forces (average score 4.50). However, when compared to other forces, police staff levels of emotional energy are lower (average score 4.77).

Across the force, high levels of challenge stressors were reported (average score 3.81⁴). When compared to other forces, police officers scored lower levels of challenge stressors, whereas police staff reported higher levels of challenge stressors. Police officers experience high levels of hindrance stressors; higher than that found in other forces (average score 3.31⁵). Police staff report moderate levels of hindrance stressors (average score 2.90); this is in line with that found in other forces.

Police staff scored higher than police officers for affective commitment to change (4.69 and 4.15, respectively). The average scores for continuance commitment to change suggest police officers believe more strongly that they have no choice but to go along with the changes, when compared to police staff. Normative commitment to change is reported higher by police staff than officers (4.95 and 4.66, respectively), implying individuals feel a sense of duty to provide support for the change. Levels of change discomfort are moderate across the force, with police officers scoring higher than staff.

The average score of extra-mile behaviour towards the organisation is high at 5.29. This suggests individuals across the force are willing to go beyond what is expected of them in their role. In addition, the average score for ethical voice behaviour is high at 5.63,

⁴ Measured on a 1-5 scale.

⁵ Measured on a 1-5 scale.

suggesting individuals are prepared to talk to their co-workers if they believe they are acting without integrity at work.

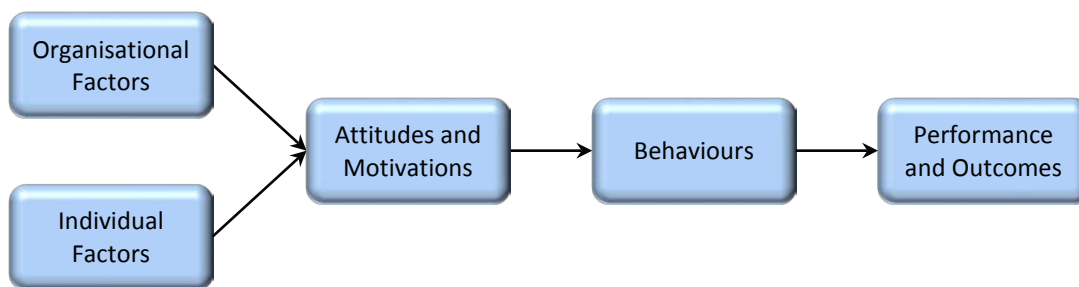
The average score for creativity behaviour suggests individuals create original ideas with the aim of solving problems, adapting to changing demands and efficiently utilising limited resources. Furthermore, the average score for innovation behaviour suggests individuals spend an encouraging amount of time engaged in generating new ideas and implementing them.

5 RELATIONSHIPS BETWEEN KEY MEASURES

5.1 Introduction to Analysis of Relationships between Key Measures

In this section we present the findings of a series of statistical analyses to test relationships between the key measures (a significance level of $p < .05$ is adopted for all reported results). Whilst in a cross-sectional study it is not possible to establish causality, we adopt an approach of prediction of relationships between variables from theoretical considerations and from prior research. We then test the generated hypotheses using linear regression analyses and PROCESS analysis. The general model shown in Figure 1 is adopted for testing relationships. In regression models, we control for the effects of gender, age, role, rank/grade and tenure in policing.

Figure 1: A General Model for Testing



Extensive prior research has shown that how people are managed and their attitudes to their jobs have a large impact on behaviour and performance. The following subsections outline the key relationships found between measures from this survey.

5.2 The Impact of Fairness Perceptions

The HMIC report on the state of policing (HMIC, 2014)⁶ identifies the need for fair treatment of employees as an important factor that affects police officer and staff attitudes which will in turn influence their behaviours. Table 3 illustrates this by demonstrating the impact of

⁶ HMIC (2014). State of Policing: The Annual Assessment of Policing in England and Wales 2013/2014. London: Her Majesty's Inspector of Constabulary. Published 31 March 2014.

fairness perceptions; it shows that fairness perceptions positively influence perceived organisational support, organisational pride and engagement. Job satisfaction and emotional energy are also positively impacted by fairness perceptions. In addition, fairness perceptions are found to increase affective commitment to change, and reduce change discomfort and uncertainty. Feeling responsible for making changes and extra-mile behaviour directed towards the organisation are positively influenced by fairness perceptions.

Table 3: The Importance of Fairness Perceptions

Measure	Effect
Perceived Organisational Support	+++
Organisational Pride	+++
Engagement	++
Job Satisfaction	+++
Emotional Energy	++
Affective Commitment to Change	+++
Change Discomfort	--
Uncertainty	---
Feeling Responsible for Making Changes	++
Extra-Mile Behaviour for the Organisation	++

+ / - denotes whether the impact of the measure is positive or negative

Figure 2: The Importance of Fairness Perceptions



Figure 2 shows an example of how fairness positively impacts engagement; it shows that fairness positively influences organisational pride, and when organisational pride is higher, individuals are more likely to be cognitively, emotionally and physically engaged in their work.

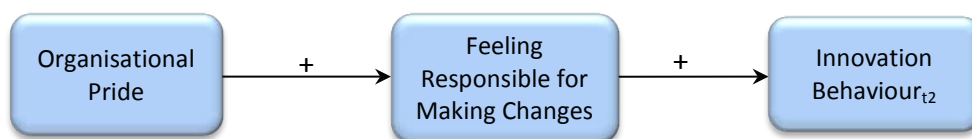
Figure 3: The Importance of Feeling Supported by the Organisation

Note: t2 signifies the measure was collected in the second survey

Figure 3 illustrates the importance of feeling supported by the organisation; it shows that when individuals perceive the organisation to be supportive and show consideration for their well-being, they become more engaged in their work, and as a result they become more willing to go beyond their role requirements at work in order to positively contribute to the organisation.

5.3 Factors Affecting Creativity and Innovation

Figure 4 illustrates that when individuals are proud of the organisation, they feel a sense of responsibility to make improvements at work with the intention to find solutions for work-related problems, which in turn leads to the generation of new ideas and planning for idea implementation.

Figure 4: Factors Affecting Creativity and Innovation

Note: t2 signifies the measure was collected in the second survey

Figure 5: Factors Affecting Creativity and Innovation

Note: t2 signifies the measure was collected in the second survey

Public service motivation is seen as a unique attribute of public-sector employees that provides them with a desire to serve the wider community. Figure 5 shows that when individuals are public service motivated they are likely to engage in creative thought processes while at work, such as identifying potential problems, researching relevant and useful information, and generating various ideas and possible solutions. When individuals engage in the creative process, they are more likely to generate new and original ideas that are useful and appropriate for problem solving in the organisation.

5.4 Factors Affecting Extra-Mile Behaviour (Organisation)

Table 4 shows that factors which affect extra-mile behaviour directed towards the organisation include vision clarity, mission importance, perceived organisational support and fairness. Individuals who feel their personal values align with those expressed in the Code of Ethics and who are motivated to serve the public are more likely to partake in extra-mile behaviour directed towards the organisation. Moreover, ethical leadership, supportive leadership and organisational pride positively impact extra-mile behaviour. Additionally, meaning of work, feelings of autonomy and challenge stressors are found to be factors that positively influence extra-mile behaviour. Regarding commitment to change, affective commitment is found to positively impact extra-mile behaviour, whereas continuance commitment is found to have a negative impact.

Table 4: Factors Affecting Extra-Mile Behaviour (Organisation)

Measure	Effect
Vision Clarity	++
Mission Importance	++
Perceived Organisational Support	++
Procedural Justice (Fairness)	++
Individual-Code of Ethics Values Alignment	++
Ethical Leadership	+
Supportive Leadership	+
Organisational Pride	+++
Meaning of Work	++
Public Service Motivation	++
Feeling of Autonomy	++
Challenge Stressors	+
Affective Commitment to Change	+++
Continuance Commitment to Change	--

+ / - denotes whether the impact of the measure is positive or negative

5.5 Factors Affecting Emotional Energy

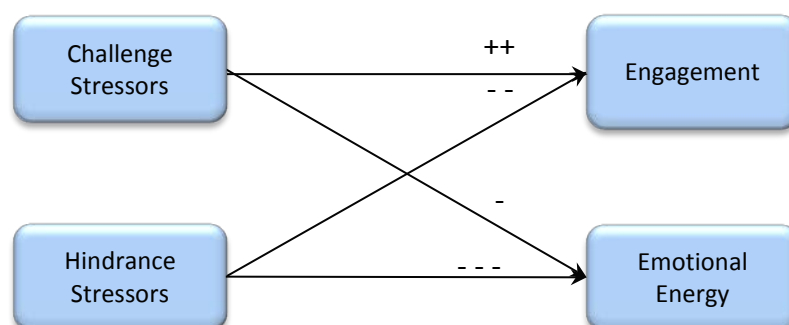
Emotional energy can be considered as a way of measuring individuals' well-being. Table 5 shows that perceptions of organisational support and fairness positively impact emotional energy. In addition, supportive leadership and feelings of autonomy are found to have a positive impact. Feeling controlled, change discomfort and uncertainty act as a strain on individuals' emotional energy. A larger negative effect is found for the impact hindrance stressors have on emotional energy, and although challenge stressors have a negative influence on emotional energy, the effect is considerably smaller than that found for hindrance stressors.

Table 5: Factors Affecting Emotional Energy

Measure	Effect
Perceived Organisational Support	++
Procedural Justice (Fairness)	++
Supportive Leadership	+
Challenge Stressors	-
Hindrance Stressors	---
Feeling of Autonomy	++
Feeling of Being Controlled	---
Change Discomfort	--
Uncertainty	--

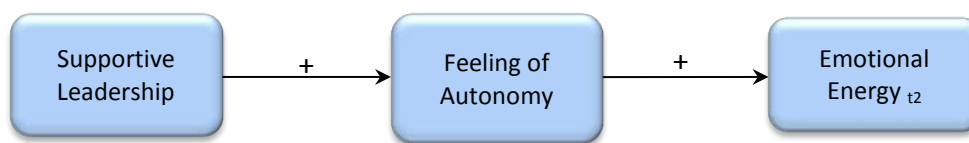
+ / - denotes whether the impact of the measure is positive or negative

Figure 6 illustrates the effects of challenge and hindrance stressors on individuals' engagement and emotional energy. It shows that while challenge stressors have a negative effect on emotional energy, hindrance stressors have a much larger negative effect. It is particularly noteworthy that hindrance stressors have a negative relationship with engagement. This suggests that when individuals perceive there to be constraints at work that frustrate them and block them from conducting their role, they will be less engaged.

Figure 6: The Effects of Stressors on Engagement and Emotional Energy

In contrast, challenge stressors have a positive relationship with engagement. This implies that when individuals perceive there to be high levels of responsibility and workload expected of them, although they may potentially find these a strain, they will view them as a worthwhile part of their work, which will motivate their level of engagement in their role. These findings highlight the importance of reducing the frequency and occurrence of hindrance stressors in the workplace.

Figure 7: Supportive Leadership and Well-Being



Note: t2 signifies the measure was collected in the second survey

Figure 7 illustrates the positive impact supportive leadership has on emotional energy. The results indicate that when individuals perceive their immediate supervisor to be supportive, they will feel a sense of autonomy, which will positively impact on their emotional energy levels and well-being.

6 SUMMARY

Mission importance, public service motivation, alignment with Code of Ethics values and meaning of work are all reported as high.

Emotional energy is higher in staff than officers.

Organisational pride and engagement are at high levels.

Improvement in perceptions of fairness and organisational support could be beneficial.

A reduction of hindrance stressors will be advantageous.

Benefits will occur through providing higher levels of autonomy to individuals in their job.

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Agenda Item 9

Committee(s): Police: Professional Standards and Integrity Sub Committee- For information	Date: 5 th March 2017
Subject: HMICFRS PEEL Legitimacy Inspection 2017	Public
Report of: Commissioner of Police	For Information
Report author: Stuart Phoenix, Head of Strategic Development	

Summary

Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), published both National and Force Reports on the Police PEEL¹ Legitimacy Inspection 2017 on the 12th December 2017. This report to your Sub Committee provides a detailed overview of the findings of the Inspection, ownership of Areas for Improvement and arrangements for oversight of progress.

The City of London Police received an overall grading of **REQUIRES IMPROVEMENT**.

The Force report identified 7 Areas for Improvement (AFIs) which are listed below.

No	AFI
1.	The Force should ensure that all relevant officers have received appropriate training on the use of stop and search powers
2.	The Force should maintain and monitor a comprehensive set of data to understand the impact of its use of stop and search powers.
3.	The Force should ensure that all relevant officers and supervisors understand what constitutes reasonable grounds for stop and search and how to record them.
4.	The Force should improve how it investigates allegations of discrimination and take action to ensure that all complainants and officers and staff subject to allegations of discrimination receive a good service from the force.
5.	The Force should improve the quality and timeliness of updates to complainants and witnesses during investigations in line with IPCC statutory guidance.
6.	The Force should improve its ability to monitor and improve the fairness and effectiveness of its processes for managing individual performance and development and communicate this to the workforce.
7.	The Force should improve its understanding of its workforce's wellbeing and use this to prioritise the services it provides.

¹ PEEL- Police Efficiency, Effectiveness & Legitimacy

The national report identifies 1 Cause for Concern and makes 2 Recommendations which are directly applicable to the Force in the area of Stop and Search.

The report was recently presented at the Force Strategic Management Board on the 31st January 2018, where Senior Responsible Officers were agreed for ownership and delivery of the actions required. These will be monitored through the Forces Performance Management Group and updates will be submitted to the Performance and Resource Management Sub Committee as part of the regular HMICFRS update.

Recommendation(s)

Members are asked to receive the report and note its contents.

Main Report

Background

1. The PEEL Inspection programme is HMICFRS's annual all-force inspection programme covering forces' effectiveness, efficiency and legitimacy. In November 2014 the first PEEL Assessments were published and have been undertaken annually since this time.
2. On 12th December 2017 HMICFRS published its PEEL Police Legitimacy 2017 Inspection reports, the findings of which were reported at the January 2018 meeting of the Force Strategic Management Board and Senior Responsible Officers identified to take forward the Areas for Improvement (AFIs).
3. In the 2016 round of PEEL Legitimacy Inspections, the Force received the overall judgment grading of GOOD.

Current Position

Force Report

4. In the 2017 PEEL Legitimacy Inspection the Force received an overall judgment grading of REQUIRES IMPROVEMENT for the overarching question of:

“How legitimate is the Force at keeping people safe and reducing crime”

5. Against each individual question set for this inspection the Force received the following grades:

- i. To what extent does the force treat all of the people it services with fairness and respect? Graded: REQUIRES IMPROVEMENT

This question gave a more focused consideration than in previous years of how forces deploy 2 coercive powers – use of force and stop and search – including monitoring and scrutiny of these powers as well as leaders' and wider workforces' understanding of how to use them fairly and with respect.

It also examined workforce understanding of procedural justice by checking the understanding of the concept of unconscious bias and awareness of effective communication skills.

ii. How well does the force ensure that its workforce behaves ethically and lawfully? Graded: REQUIRES IMPROVEMENT

This question considered the extent to which forces develop and maintain an ethical culture to reduce unacceptable types of behaviour in workforce. It also re-examined how well forces handled complaints and misconduct cases focusing specifically on access to complaints system and handling of allegations of discrimination.

iii. To what extent does the force treat its workforce with fairness and respect? Graded: GOOD

This question considered how well forces identify individual and organisational concerns within their workforce and act on these findings, including in the context of workforce wellbeing. It also included an assessment of the extent to which forces are taking action to make their workforce more representative of the communities they serve.

6. The detailed findings against each question set for the Force and National Reports are attached at Appendix A.

Force report- Areas for improvement

The Force report identified 7 Areas for Improvement (AFIs) which are listed below.

No	AFI
1.	The Force should ensure that all relevant officers have received appropriate training on the use of stop and search powers
2.	The Force should maintain and monitor a comprehensive set of data to understand the impact of its use of stop and search powers.
3.	The Force should ensure that all relevant officers and supervisors understand what constitutes reasonable grounds for stop and search and how to record them.
4.	The Force should improve how it investigates allegations of discrimination and take action to ensure that all complainants and officers and staff subject to allegations of discrimination receive a good service from the force.
5.	The Force should improve the quality and timeliness of updates to complainants and witnesses during investigations in line with IPCC statutory guidance.
6.	The Force should improve its ability to monitor and improve the fairness and effectiveness of its processes for managing individual performance and development and communicate this to the workforce.
7.	The Force should improve its understanding of its workforce's wellbeing and use this to prioritise the services it provides.

National Cause of Concern and recommendations

7. HMICFRS is concerned that forces are not able to demonstrate that the use of stop and search powers is consistently reasonable and fair. In particular, there is over-representation of Black and Minority Ethnic (BAME) people, and black people in particular, in stop and search data which many forces are unable to explain.
 - I. By July 2018, all police forces across England and Wales should be regularly and frequently monitoring a comprehensive set of data and information on use of stop and search powers to understand:
 - The reasons for any disproportionate representation of different ethnic groups in the use of stop and search.
 - The extent to which find rates differ between people from different ethnicities, and across different types of searches (including separate identification of find rates for drug possession and supply-type offences)
 - The prevalence of possession-only drug searches, and the extent to which these align with local or force level priorities

Where forces identify disparities through monitoring, they should demonstrate to the public that they have:

- Carried out research and analysis in an attempt to understand the reasons for the disparity, and
- Taken action to reduce the disparity, where necessary.

HMICFRS expect forces to publish this analysis and any actions taken at least on an annual basis, from July 2018.

- II. By July 2018, and ongoing following that date, forces should ensure that all officers who use stop and search powers have been provided with and understand, training on unconscious bias and College of Policing Authorised Professional Practice (APP) on stop and search.
8. Activities and delivery of improvements cross cut a number of different service areas and SROs have been identified and tasked to lead on the delivery of each AFI as agreed at the January Force Strategic Management Board Meeting as follows:

- **Stop and Search (AFIs 1-3 and national recommendations 1 and 2)**

Lead officer, Supt Operations Lee Presland (currently A/Supt Rob Wright)

Monitoring and governance for delivery to be via Stop and Search and Use of Force Working Group.

Work has already commenced around quality assuring and monitoring grounds recording for Stop and Search.

- **Complaints (AFIs 4 & 5)**

Lead officer Detective Supt Maria Woodall, PSD Director

Monitoring and governance of delivery to be via Professional Standards Department Working Group.

It should be noted that many of the identified shortcomings were originally revealed during the file review which took place in advance of the full inspection and that immediate action was taken at the time to address findings.

- **Performance and Wellbeing (AFIs 6 & 7)**

Lead officer, HR Director, Julia Perera

Monitoring and governance for delivery to be via Strategic Workforce Planning and Force Health & Safety (including Wellbeing) meeting.

National Report

9. The (overview) national report details that HMICFRS' overall assessment of forces was positive.

Included within the report are a number of 'positive expectation' statements from HMICFRS as well as areas of best practice being cited, the below relate to CoLP, which is encouraging.

- ✓ CoLP has developed a BAME 2018 plan in addition to its existing People Strategy *{to help it understand and address under representation in its workforce}*.
- ✓ CoLP has a percentage figure for officers on sickness absence (as at 31.03.17) of 1.3% (the lowest of all 43 forces, with the highest being 6.1% in Cleveland Police).

Detailed findings against each question set are attached in Appendix A.

Corporate and Strategic Implications

10. The PEEL Inspection process is an annual process but HMICFRS have indicated that they will continue to develop the methodology for future inspections.

11. For 2018 HMICFRS are also proposing to move towards an integrated PEEL assessment process (IPA) which will involve moving to a more risk-based approach with greater focus on the aspects of policing in forces which HMICFRS determine present the greatest risks to the public, it is clear that Stop and Search will fall into this category. Part of these changes will mean that there will not be a round of inspection activity in the spring of 2018 (normally the Efficiency and Legitimacy pillars) but a rolling programme of integrated inspection fieldwork will

commence in the autumn across all pillars. Data collection will also move to a quarterly submission from June 2018 onwards.

Conclusion

12. The Force accepts the Areas for Improvement that HMICFRS has identified in the 2017 Legitimacy Inspection. The Force is committed to making the improvements required and these will be reported in the quarterly HMICFRS update to the Police Performance and Resource Management Sub Committee.

Appendices

- Appendix A- detailed findings against each question set for the Force and National Reports

Background Papers

PEEL: Police Legitimacy 2017 Report

<https://www.justiceinspectors.gov.uk/hmicfrs/wp-content/uploads/peel-police-legitimacy-2017-1.pdf>

City of London Police – PEEL Police Legitimacy (including leadership) 2017

<https://www.justiceinspectors.gov.uk/hmicfrs/wp-content/uploads/peel-police-legitimacy-2017-city-of-london.pdf>

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Appendix A- HMICFRS PEEL Legitimacy 2017 Inspection outcome

Detailed findings against question sets for both Force Report and National Report.

FORCE REPORT

Findings against each question set is as follows.

To what extent does the force treat all of the people it services with fairness and respect?

- ✗ Needs to improve some aspects of how it treats people.
- ✗ Some officers not effectively recording grounds for Stop & Search.
- ✗ Force is failing to adequately supervise officers' recording of these grounds, in part due to lack of understanding of what constitutes reasonable grounds by both officers and supervisors.
- ✗ Working Group needs to monitor reasonableness of grounds of stop and search more closely.
- ✗ Has not completed stop & search training for all frontline officers.
- ✗ Has not provided enough training on unconscious bias for its workforce
- ✗ Use of performance dashboards (for stop & search and use of force) not fully developed (scrutiny and understanding of data) so cannot be confident force is able to identify unfair or good practice.
- ✗ Force needs to carry out research as to how influx of daytime visitors changes the profile of its resident population.
- ✓ Workforce has good communication skills including showing empathy and listening.
- ✓ External scrutiny (of stop and search) has improved considerably, but could be further developed if independent chair appointed to Community Scrutiny Group.
- ✗ Force could do more to attract external scrutiny and challenge from people who may have less trust and confidence in police, eg, recent immigrants, black and ethnic (BAME) minority communities, visitors and people who work but do not live in City.

How well does the force ensure that its workforce behaves ethically and lawfully?

- ✗ Could do more to ensure its workforce behaves ethically and lawfully.
- ✗ File review found force failing to consistently update complainants on progress of investigation, but at time of full inspection processes had been revised to address.
- ✓ Outstanding practice from force's leadership in building a strong base in ethical decision making including training entire workforce has received.

- ✘ Above not reflected in how force investigates allegations of discrimination and the service that all parties receive during investigations of discrimination is unsatisfactory.
- ✘ Force should review (proposed) changes to handling of discrimination allegations to reassure itself that investigations are carried out satisfactorily.
- ✓ Force has managed to reduce vetting backlog considerably.

To what extent does the force treat its workforce with fairness and respect?

- ✓ Leaders actively seek feedback and challenge from workforce and make changes as a result
- ✓ Values wellbeing and provides good support to workforce.
- ✘ Still to put Wellbeing Strategy fully into practice and could do more to more clearly understand risks and threats to personnel and prioritise services provided accordingly rather than trying to address all aspects at once.
- ✘ Needs to better understand effect on health and welfare of workplace issues eg, workload, and monitor the use/take up of existing support provisions made available.
- ✘ Needs to develop its system for assessing performance (PDR) and link this to career aspirations of individuals and the offer of development opportunities.
- ✓ Force has used external recruitment effectively to address gaps in capability.
- ✓ In general approach to grievances appears effective but **all** cases should record arrangements put in place to support employee or witnesses throughout process.
- ✓ Force is aware that workforce is not representative of local population and has a plan to address, including a BME 2018 Progression Plan.

NATIONAL REPORT

Findings against each question set is as follows.

To what extent does the force treat all of the people it services with fairness and respect?

- ✓ Findings continue to be largely positive but there are still significant areas requiring improvement
- ✓ Increased training by forces in unconscious bias and communication skills occurring, but at a varied level across forces.
- ✘ Need to do more work to ensure entire workforce equipped to make fair decisions and treat public and colleagues in a way that does not lead to unfair treatment of particular individuals or groups.
- ✘ Communications skills training tends to focus on conflict management and de-escalation (as part of PST), but should also include other skill sets including active listening, showing empathy,

- building rapport, using positive and supportive language and explaining actions and decisions.
- ✓ Understanding of how to use coercive powers fairly and with respect generally good.
- ✗ Effective recording, monitoring and using external scrutiny to understand use of Stop & Search powers is variable and in some cases must improve.
- ✗ Concerned at over-representation of black people in Stop & Search figures still and extent of forces' ability to explain disparity.
- ✗ Use of Stop & Search powers not always being targeted effectively in response to force priorities (eg, street level drug searches for possession feature highly but this crime not usually a force priority)
- ✗ Further consideration of efficacy, safety, and legitimacy of use of spit guards (with a view to producing guidance on safe and proportionate use) necessary by national groups.

Included within the report are a number of 'positive expectation' statements from HMICFRS as well as areas of best practice being cited.

- ✓ HMICFRS encourage forces to guide officers to using strong multiple grounds including behavioural factors rather than situational factors when deciding to stop & search.
- ✓ HMICFRS supports forces mandating use of Body worn cameras for specific activities, eg, when using force and for Stop & Search to enable more effective scrutiny.
- ✓ Forces should monitor a series of comprehensive data sets from a variety of sources to aid understanding (but few have adopted all):
 - Data on use of powers on young people and BAME people (including volume, outcomes, item found rate, and connection between outcome and object searched for.
 - Data on frequency of use of powers
 - Data and information on the effectiveness of the use of powers (rate at which items searched for are found alongside find rates for different types of Stop & Search).
 - Scrutiny of body-worn video camera footage to understand extent to which people stopped and searched are treated fairly and with respect
 - Feedback and challenge from public, including complaints, surveys, social media, independent scrutiny groups and those taking part in schemes in which members of public patrol with and observe the police.
- ✓ Northamptonshire Police has introduced an independent panel which regularly reviews Stop and Search records including reasonable grounds, force takes appropriate action on feedback. This has led to force achieving 199/200 records having reasonable grounds recorded during inspection review of records.
- ✓ Bedfordshire Police encourages all people who have been stopped and searched to join their external scrutiny panel which has led to it having good young BAME representation.

How well does the force ensure that its workforce behaves ethically and lawfully?

- ✓ Consideration of ethics as part of decision making processes becoming more widespread.
- ✗ Compliance with national Vetting Policy (as found in 2016) still not remedied in some forces.
- ✗ Force handling of complaints mixed, particularly in providing appropriate follow up to complainants.
- ✗ Some forces need to do more to inspire public confidence in complaints system.
- ✗ Improvements in publication of complaints processes within communities necessary including diverse language material in public places, non police premises and police enquiry and custody units.
- ✗ CoLP was unable to provide data on 'in datedness' of level of vetting / security clearance for workforce.

As above included within the report are a number of 'positive expectation' statements from HMICFRS as well as areas of best practice being cited.

- ✓ Forces should review their templates for initial letters to complainants to ensure that when completed they will contain the required information, including a copy of the complaint record.
- ✓ Using investigating officers who have not been trained to apply discrimination guidelines mean forces are less likely to conduct thorough investigations or to maintain the confidence of complainants.
- ✓ Forces could significantly improve the quality of (*complaint and discrimination*) investigations by tackling reasons for investigative failures (as identified by HMICFRS):
 - Failure to understand allegations
 - Failure to conduct research into background of officer
 - Failure to obtain and probe officer's account properly
 - Failure to gather all of available evidence
 - Failure to evaluate all of evidence properly
- ✓ Cheshire Constabulary one of 23 forces who handled all complaints reviewed satisfactorily. They provide local supervisors with a comprehensive severity assessment explaining nature of discrimination alleged and reason it is suitable for local resolution. They provide comment or assessment of any issues that would lead to community tensions and points of contact in PSD and copy of IPCC guidelines for handling complaints.

To what extent does the force treat its workforce with fairness and respect?

- ✓ Overall forces good at treating officers and staff with fairness and respect, but improvements still required in over a 1/3 of forces.

- ✓ Forces continuing to see seek feedback from and monitor workforce data and information to identify workforce concerns, with better performing forces having effective forums for drawing together workforce feedback and wider management information to identify organisational and individual issues.
- ✗ Forces could do more to demonstrate to workforce that effective action is taken to address concerns and improve fairness.
- ✗ Provision of and access to wellbeing support remains variable.
- ✗ Most forces could do more to demonstrate that support for wellbeing is targeted at individuals or groups who are most in need.
- ✗ Many forces relying on supervisors to identify, understand and support wellbeing needs of individuals often as a result of reduced human resource and occupational health provision.
- ✗ Many supervisors lack confidence in identifying and supporting people with Wellbeing concerns.
- ✗ Still progress to be made before police workforces, at all levels, reflect the communities they serve.
- ✗ Minimal evidence of improvement in the frequency and quality of performance conversations between individuals and supervisors.

Again included within the report are a number of 'positive expectation' statements from HMICFRS as well as areas of best practice being cited.

- ✓ CoLP has developed a BAME 2018 plan in addition to its existing People Strategy *{to help it understand and address under representation in its workforce}*.
- ✓ CoLP has a percentage figure for officers on sickness absence (as at 31.03.17) of 1.3 (the lowest of all 43 forces, with the highest being 6.1% in Cleveland Police).
- ✓ HMICFRS pleased to see an increasing number of forces making more diverse recruitment a priority.

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Committee(s): Professional Standards and Integrity Sub Committee	Date: 5 th March 2018
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 Force's Integrity Standards Board on 28th February, which is past the deadline for submission of papers to your Sub Committee; a verbal update will be provided.

Code of Ethics Update:

The last scheduled meeting of the London Police Challenge Forum (LPCF) scheduled for the 5th December did not take place due to lack of submissions for consideration.

The Force hosted a half day event for the LPCF on 11th January 2018. It was opened by Commissioner Ian Dyson and was attended by Chief Constable Julian Williams. A number of academics and colleagues from MOPAC also took part.

At the time this report was prepared the Staff Survey Action plan has not been finalised, it has not therefore been possible to review the Integrity dashboard indicators or refresh the Integrity Action plan.

Her Majesty's Inspector of Constabulary and the Fire and Rescue Service's (HMICFRS) report on Legitimacy was published on 12th December 2018 and is submitted to your Sub Committee for information as a separate agenda item.

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 next Board will be the 28th February 2018, which is past your Sub Committee's deadline for papers.
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 last meeting of the London Police Challenge Forum (LPCF) scheduled for 5th December 2017 did not take place due to the lack of submissions made for consideration. This was one of the primary drivers behind the LPCF event held on 11th January 2018, which was considered a partial re-launch of the initiative.
6. The half-day event on 11th January 2018 was hosted by the City of London Police; it was opened by Commissioner Ian Dyson and attended by Chief Constable Julian Williams (who closed the event) together with a number of academics, colleagues from MOPAC (and other former police authorities) and HMICFRS.
7. The event covered:
 - a. A review of the year
 - b. Plans for the year ahead (which includes work to develop the national database, an LPCF evaluation strategy and a new engagement strategy)
 - c. Presentations from academics and private industry
 - d. Consideration of an ethical dilemma
 - e. Panel Q&A session.

8. A meeting took place on 9th February 2018 between the City of London Police, Metropolitan Police and British Transport Police to discuss the next steps on the LPCF's development.
9. The following topics were discussed at the meeting:

National

- a. It was noted that CC Williams has requested a national meeting of ethics leads (in place of a planned National Conference), although a date is yet to be set.
- b. The College of Policing and National Police Chiefs' Council are considering an early draft of a national policy covering appropriate personal relationships and behaviour in the workplace.
- c. The College of Policing are still exploring the feasibility of using POLKA (Police Online Learning and Knowledge Area) as its ethical dilemma repository database.

Regional

- d. The first regional meeting will be held at Bath Spa University on 6th March and is being hosted by Professor MacVean.

LPCF

- e. At 8th February 2018 there were 8 ethical dilemmas submitted to the LPCF for consideration covering temporary promotion, voluntary interviews, freemasons and the police, the role of the moral manager, an officer subject to a drink drive charge and 3 connected dilemmas concerning use of Home Office Biometric systems. At the meeting it was decided not to progress with two of the dilemmas (moral manager and drive drive charge) on the basis that they are subject to an ongoing disciplinary procedures and those panels would consider any ethical/Code of Ethics implications as part of their deliberations. The remaining 6 will be considered at the next LPCF.
- f. Representatives from the LPCF have been invited to provide a briefing of their work to MOPAC (likely to take place in May/June 2018).
- g. The group considered drafts of a marketing/communications strategy for the LPCF.
- h. Dates for future panels were agreed:
 - i. 27th February (MPS and BTP to host)
 - ii. 2nd May (CoLP and MPS to host)
 - iii. 4th July (MPS and BTP to host)
 - iv. 12th September (CoLP and MPS to host)
 - v. 7th November (MPS and BTP to host)
- i. It was agreed that another annual event would be organised for 4th December 2018, either hosted at New Scotland Yard or Wood Steet Police Station.

Integrity Action Plan

10. It was intended to present a revised Integrity Action Plan to your Sub Committee, however, it is still being reviewed. The review is dependent on two key inputs: the staff survey action plan; and the future planned work of the LPCF. Whilst the second of those inputs has now taken place (on the 9th February, which had to be rescheduled from early December), the staff survey action plan is still to be agreed. A meeting has been scheduled for early March 2018 to progress this so that the revised Integrity Action Plan can be submitted to the next Integrity Standards Board and your Sub Committee.

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 last quarter (December 2017 to present), the following audits have been completed:

- a. Computer Aided Despatches (CADs) opened on violence/public order
- b. CADs opened on other crimes
- c. CADs closed on non-crime codes
- d. Call listening (to ensure crimes are being correctly recorded following report).

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

HMICFRS¹ report on Legitimacy

15. On 12th December the HMICFRS published a national report on Legitimacy, accompanied by individual force reports. A separate detailed report is submitted to your Sub Committee for information.

Appendices

¹ Her Majesty's Inspectorate of Constabulary and the Fire and Rescue Services

- Appendix A – Integrity Dashboard (draft – not considered by the Integrity Standards Board)

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APPENDIX A

CITY OF LONDON POLICE

**DRAFT INTEGRITY
DASHBOARD 2017/18**

Quarter 3

Version 1.0



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FORCE INTEGRITY INDICATORS										
Number	Indicator	Historic Levels				Current Levels 2017/18				
1	Number of Grievances registered with HR	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
		7	7	7	13	3	3	0		6
No new Grievances submitted. No integrity issues have been identified in relation to the grievances raised in Qtrs 1 or 2										
2	Number of Employment Tribunals that cite the Force	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	2	0	2	0	0	2		0
Both ET's cite sex discrimination but are not related. The ETs are still in the early stages and do not relate to integrity issues but processes.										
3	Number of registered complaints against Force excluding Action Fraud	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
		60	117	105	102	32	21	16		69
There were 16 complaints recorded during the Q3 period and 29 allegations (both excluding Action Fraud). Of these 29, the Top 5 National Allegation categories accounted for:- Other assault x 1; Oppressive Conduct/Harassment x 0; Unlawful/unnecessary arrest or detention x 1; Other neglect or failure in duty x 1; Incivility/Impoliteness/ Intolerance x 5										
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	17	6	2	8		16
There were 8 civil cases recorded during Q3: - 1 x Non-referral re Action Fraud; 2 x Slander/libel; 1 x unknown; 1 x Unlawful seizure and cash detention orders; 1 x Misfeasance; 1 x Industrial Accident and 1 x HRA breach of right to life.										
5	Investigations resulting from monitoring of irregular mobile phone use	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0	0	1	0	0	0		0
No investigations have arisen as a result of monitoring exercises										
6	Number of monitoring exercises around irregular use/transitions involving Corporate credit cards	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	1	5	19	0	0	0		0
There were 0 monitoring exercises during Q3 due to resourcing shortages. No investigations undertaken re specific card breaches.										
7	Number of PSD investigations principally arising from complaints on use of Force	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	1	2	6	0	0	0		0
Use of Force Forms now being recorded via Pronto - They are not being used for the purposes of integrity monitoring by CCU										
8	Number of monitoring assessments undertaken around expenses claims	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	1	2	1	1	1	0		2
There were 0 monitoring exercises during Q3. No investigations undertaken re specific expense claim breaches.										
9	Number of business Interest Investigations undertaken for police officers	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
		1	3	1	6	0	0	0		0
There were 2 Business Interests recorded in Q3 for Police Officers - 1 x Rent and property lease and 1 x partner re soft play business (CCU reviews business interests annually)										

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FORCE INTEGRITY INDICATORS										
Number	Indicator	Historic Levels				Current Levels 2017/18				
		2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
10	Number of business Interest Investigations undertaken for support staff	0	0	0	0	0	1	0		1
	There was 1 Business Interest recorded in Q3 for Civilian Staff - 2x Lecturer; (CCU reviews business interests annually)									
11	Number of unregistered CoLP media contacts detected by Corp Comms and reported to PSD	0	2	0	5	0	1	0		1
	0 investigations during Q3									
12	Number of investigations undertaken by PSD as a result of PNC/PND dip sampling	1	1	2	0	0	0	0		0
	No investigations during Q3									
13	Number of monitoring exercises conducted on gifts and hospitality register entries	0	5	3	8	1	0	0		1
	There were 0 monitoring exercises during Q3. No investigations or assessments. Download of 09/01/2018 – There were 98 Gifts and Hospitality submissions recorded during Q3 – at the time of download, 75 were showing as accepted, 22 declined and 1 given. Of the 98 entries, 38 related to NPCC, 35 x ECD, and the remainder spread across the other Directorates.									
14	Number of management issues arising from re-vetting of the workforce			0	0	0	0	0		0
	No unsuccessful re-vet applications. 272 new applications, 259 completed applications, 229 Pending applications, 6 refusals. All refusals were a mixture of "Honesty and Integrity" and financial concerns.									
15	Number of procurement purchases assessed by PSD for investigation	0	0	2	1	1	2	0		3
	0 investigations during Q3.									
16	Number of positive results from testing with cause random drug testing			0	0	0	0	0		0
	9 random drug tests were undertaken. No positive results reported.									
17	Identified breaches of the Donations and sponsorship SOP				-	-	-	-		-
	This was a new measure approved by the Integrity Standards Board in September. At the present time no data returns received from Finance on this measure.									

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