



Professional Standards and Integrity Sub (Police) Committee

Date: WEDNESDAY, 6 JUNE 2018
Time: 10.30 am
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

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

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Next Meetings: 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

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 5 March 2018.

For Decision

(Pages 1 - 6)

4. **OUTSTANDING REFERENCES**

Report of the Town Clerk

For Information

(Pages 7 - 12)

5. **INTEGRITY DASHBOARD AND CODE OF ETHICS UPDATE**

Report of the Commissioner of Police

For Information

(Pages 13 - 42)

6. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

7. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

8. **EXCLUSION OF THE PUBLIC**

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

For Decision

9. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the last meeting, held on 5 March 2018.

For Decision

(Pages 43 - 46)

10. **NON-PUBLIC OUTSTANDING REFERENCES**

Report of the Town Clerk

For Information

(Pages 47 - 48)

11. **PROFESSIONAL STANDARDS STATISTICS Q4**
Report of the Commissioner of Police
- For Information**
(Pages 49 - 76)
12. **MISCONDUCT HEARINGS**
Report of the Commissioner of Police
- For Information**
(Pages 77 - 82)
13. **CASE TO ANSWER / UPHELD**
Report of the Commissioner of Police
- For Information**
(Pages 83 - 86)
14. **NO CASE TO ANSWER / NOT UPHELD**
Report of the Commissioner of Police
- For Information**
(Pages 87 - 116)
15. **LOCAL RESOLUTION**
Report of the Commissioner of Police
- For Information**
(Pages 117 - 130)
16. **COMPLAINTS BULLETIN Q4**
Report of the Commissioner of Police
- For Decision**
(Pages 131 - 144)
17. **GLOSSARY**
Report of the Commissioner of Police
- For Information**
(Pages 145 - 150)
18. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE
WHILST THE PUBLIC ARE EXCLUDED**
19. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT WHILST
THE PUBLIC ARE EXCLUDED**

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PROFESSIONAL STANDARDS AND INTEGRITY SUB (POLICE) COMMITTEE

Monday, 5 March 2018

Minutes of the meeting of the Professional Standards and Integrity Sub (Police) Committee held at the Guildhall EC2 at 2.30 pm

Present

Members:

Alderman Alison Gowman (Chairman)
Nicholas Bensted-Smith
Tijs Broeke

Mia Campbell
Lucy Sandford (External Member)

Officers:

Oliver Bolton	-	Town Clerk's Department
George Fraser	-	Town Clerk's Department
Tarjinder Phull	-	Comptroller & City Solicitor's Department
Maria Woodall	-	Director of Professional Standards, CoLP

1. APOLOGIES

Apologies were received from Deputy Doug Barrow, Deputy James Thomson, James Tumbridge and Deputy Richard Regan.

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 minutes of the last meeting, held on 1 December 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 Chairman acknowledged her approval that the decision to enable reduced restrictions on the agenda packs in the interests of transparency had been finalised, thanking the Director of Professional Standards for her efforts in making this possible.

OR3 – London Police Challenge Forum Minutes

It was agreed by Members that, although this action had not been completed, this was no longer relevant and should be removed.

OR4 – Gifts & Hospitality Report

It was agreed that this would be submitted to the next meeting on 6 June 2018.
(1)

OR5 – Body Worn Video (BWV) Demonstration

It was agreed that this would be postponed to the September meeting. (2)

OR7 – LPCF Participation Process

It was agreed that this would be confirmed by the next meeting on 6 June 2018.
(3)

OR8 – Force Leadership Changes Update

It was agreed that the Assistant Commissioner would circulate an update on Force Leadership changes on a monthly basis to Members of the Police Committee and its Sub-Committees. (4)

OR9 - National Association of Legally Qualified Chairs

The link had not yet been made with this organisation and this would be followed up at the next meeting (5)

RESOLVED – That the report be received.

5. **BODY WORN VIDEO (BWV) DEMONSTRATION**

RESOLVED - It was agreed that this item would be postponed to the meeting on 17 September 2018. (2)

6. **HANDCUFFING OF JUVENILE STATISTICS**

The Sub-Committee received a report of the Commissioner of Police that aimed to address concerns raised following submission of a paper to the Police Committee and Safeguarding Sub (Community & Children's Services) Committee that the City of London Police were using excessive force on juveniles in custody.

The Chairman noted that the figures were incorrectly presented in the earlier report, leading to misplaced concerns, but stated that there was now confidence that procedure was in fact correct and justified.

A Member noted that the original data was very clearly incorrect and explained that it was surprising that it had not been flagged initially.

The Chairman noted that issues with comparisons of data across forces was often problematic.

RESOLVED – That the report be received.

7. **CHANGES TO THE COMPLAINTS APPEALS PROCESS**

The Sub-Committee considered a report of the Town Clerk that informed Members about the reforms to the Police complaints process being introduced by the Police and Crime Act 2017.

The Town Clerk advised that a streamlining of the complaints process was necessary, outlined some of the key changes. He explained that there was some concern around the "Definition of Complaint", as referenced under paragraph 3a. He advised that changes would be delayed to 2019, but that the protocol will be enacted in late 2018.

The Chairman explained that the complaints procedure should become more aligned with the standard human resources processes.

RESOLVED – That the report be received.

8. **STAFF SURVEY UPDATE**

The Sub-Committee received a report of the Commissioner of Police that gave an overview of the recent Staff Survey of the City of London Police.

The Chairman stated that the report had been submitted to the Police Committee in December 2017 and was requested at this Sub-Committee. It was appropriate to measure the impact of the Staff Survey.

A Member explained that it was important to have a good understanding of the survey. He noted that it was produced as an academic paper which was not easily digestible and suggested that perhaps this was an issue. Another Member explained that it was difficult to get meaningful conclusions from reports such as these.

The Sub-Committee noted the content of the report but advised that Members still wanted clarity on the understanding of the Intelligence and Information Directorate, and asked for an action plan to be clarified with a report submitted to the next Sub-Committee. It was agreed that Chief Superintendent David Evans should attend at the June meeting to present this report. (7)

RESOLVED – That the report be received.

9. **HMICFRS PEEL LEGITIMACY INSPECTION 2017**

The Sub-Committee received a report of the Commissioner of Police that provided Members with a detailed overview of the findings of the recent HMICFRS PEEL Legitimacy inspection, ownership of Areas for Improvement and arrangements for oversight of progress.

The Head of Governance and Assurance explained that this had been marked as an action. The Chairman asked him what the action plan was, and he advised that this was submitted to the Performance and Resource Management Sub-Committee, though could also be submitted to this Sub-Committee if desired. The Chairman requested that it was. (8)

A Member noted that the report raised some concerns around the lack of appropriate training for stop-and-search received for all relevant officers.

The Chairman asked for clarification of the main issues around Areas for Improvement (AFIs) Nos. 4 & 5. The Director of Professional Standards explained that the “King Formula” was employed to define “discrimination”. She advised that the motivation was to avoid encouraging people to merely follow the letter of the law by not specifying defined characteristics.

The Director also explained that the desire was to engage with complaints immediately to allow the use of the 10-day period, noting that complaints resolved within this period are not required to be recorded. She explained that these planned changes were yet to be implemented. A Member asked when these would come into effect, and the Director of Professional Standards confirmed that they would be prior to the next meeting of this Sub-Committee. (9)

The Chairman asked how AFI No.5, relating to the timeliness and quality of updates supplied to complainants, would be addressed. The Director of Professional Standards explained that there would be consultation with the complainant about timescale expectations to agree terms.

A Member queried when the causes of concern raised under paragraph 7ii of the report, relating to stop and search bias and practices, would be addressed. The Chairman requested that this be tracked as a standalone outstanding action. (10)

A Member queried external scrutiny of stop and search, as referenced within Appendix A. The Chairman requested that the Community Scrutiny Group meeting dates be followed up on, alongside those of the Independent Advisory Group. (11)

A Member asked, in reference to Appendix A, where an overview of all actions not marked as complete was recorded. The Head of Governance and Assurance explained that the Performance Management Group would address these. The Chairman stated that it was important that addressing these issues was not solely a result of the outcome of inspections. The Head of Governance and Assurance explained that self-assessments were carried out in many of these areas, but often resourcing limitations led to known outstanding actions. He explained that, in many cases, follow-up inspections aimed to make judgements on perceived improvements made around issues identified previously. He explained that the results of the inspection should not produce any significant surprises, as the CoLP were largely aware of the areas requiring improvement.

The Chairman requested that the action plan from the PEEL Legitimacy Inspection be submitted to the next meeting. (8)

RESOLVED – That the report be received.

10. INTEGRITY DASHBOARD AND CODE OF ETHICS UPDATE

The Sub-Committee received a report of the Commissioner of Police that provided Members with an update on the Integrity Standards Dashboard and Code of Ethics of the City of London Police.

The Chairman asked for an update on the London Police Challenge Forum meeting that had taken place in January 2018. A Member (who had attended the Forum) advised that, although it was a good meeting, it was difficult to determine any concrete conclusions.

Members noted that, for indicator 9, there were two Business Interest Investigations mentioned in Q3, though “0” recorded within the table.

A Member queried the repercussions of a vetting refusal. The Chairman asked if it would be useful to have a report on vetting that provided clarity on the following (12):

1. The re-vetting process;
2. Vetting refusals and their implications (referencing the 6 refusals recorded in this report); and
3. The different levels of vetting and their associated clearances

The Chairman noted that this issue was raised by the Police Committee at their last meeting during a discussion on the JCCR. The Director of Professional Standards explained that such vetting issues commonly arose in relation to Action Fraud and clarified that as far as she was aware refusals referenced did not lead to the loss of employment for any individual.

RESOLVED – That the report be received.

11. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE

There were no questions

12. ANY OTHER BUSINESS

There was no further business

The meeting closed at 16:15

Chairman

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PROFESSIONAL STANDARDS & INTEGRITY SUB (POLICE) COMMITTEE

6 JUNE 2018

OUTSTANDING REFERENCES

No.	Meeting Date & Reference	Action	Owner	Status
1.	05/03/17 Item 4 - <i>Outstanding References</i> 01/12/17 Item 4 - <i>Outstanding References</i> 22/09/17 (7) Item 4b - <i>Police Integrity Development and Delivery Plan Report 2016-17</i> Gifts & Hospitality report	<p>The Gifts & Hospitality report to be published and made clearly visible on the CoLP website.</p> <p>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> <p>Update 05-03-18: This will be submitted to the next meeting.</p>	CoLP	DUE JUNE 2018
2.	05/03/17 Item 4 - <i>Outstanding References</i> 01/12/17 Item 4 - <i>Outstanding References</i> Body Worn Video (BWV) Demonstration	<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> <p>Update 05-02-18: This was postponed to the September meeting.</p>	CoLP/ Town Clerk	DUE SEPTEMBER 2018

3.	<p>01/12/17 Item 7 - <i>Integrity Development and Delivery Plan Report 2016-17 (Nov 17 Update)</i></p> <p>LPCF participation process</p>	<p>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.</p> <p>Update 05-03-18: Any update would be due by the June meeting.</p>	CoLP	DUE JUNE 2018
4.	<p>01/12/17 Item 7 - <i>Integrity Development and Delivery Plan Report 2016-17 (Nov 17 Update)</i></p> <p>Force Leadership Changes Update</p>	<p>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.</p> <p>05-03-18: It was agreed that the Assistant Commissioner would circulate an update on Force Leadership changes on a monthly basis to Members of the Police Committee and its Sub-Committees.</p> <p>Update 29-05-18: A Force Organigram was circulated to Members of the Police Committee and its Sub-Committees in March 2018.</p>	CoLP	OUTSTANDING
5.	<p>01/12/17 Item 8a - <i>Questions relating to the work of the Sub-Committee</i></p> <p>National Association of Legally Qualified Chairpersons for Police Misconduct Panels</p>	<p>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.</p>	CoLP	OUTSTANDING

7.	05/03/18 Item 8 - <i>Staff Survey Update</i> Staff Survey Action Plan	The Sub-Committee noted the content of the report but advised that Members still wanted clarity on the understanding of the Intelligence and Information Directorate and asked for an action plan to be clarified with a report submitted to the next Sub-Committee. It was agreed that Chief Superintendent David Evans should attend.	CoLP	REPORT DUE JUNE 2018
8.	05/03/18 Item 9 - <i>HMICFRS PEEL Legitimacy Inspection 2017</i> Legitimacy Action Plan	<p>The Sub-Committee received a report of the Commissioner of Police that provided Members with a detailed overview of the findings of the recent HMICFRS PEEL Legitimacy inspection, ownership of Areas for Improvement and arrangements for oversight of progress.</p> <p>The Head of Governance and Assurance explained that an action was currently in place. The Chairman asked him what the action plan was, and he advised that this would be submitted to the Performance and Resource Management Sub-Committee but could be submitted to this Sub-Committee also if desired. The Chairman requested that it was.</p>	CoLP	REPORT DUE JUNE 2018
9.	05/03/18 Item 9 - <i>HMICFRS PEEL Legitimacy Inspection 2017</i> New Complaints Procedure	<p>The Chairman asked for clarification of the main issues around Areas for Improvement (AFIs) Nos. 4 & 5. The Director of Professional Standards explained that the “King Formula” was employed to define “discrimination”. She advised that the motivation was to avoid encouraging people to merely follow the letter of the law by not specifying defined characteristics. She also explained that the desire was to engage with complaints immediately to allow maximal use of the 10-day period, noting that complaints resolved within this period are not required to be recorded.</p> <p>She explained that these planned changes were yet to be implemented. A Member asked when these would come into effect, and the Director of Professional Standards confirmed that they would be prior to the next meeting of this Sub-Committee.</p>	CoLP	DUE JUNE 2018

10.	05/03/18 Item 9 - <i>HMICFRS PEEL</i> <i>Legitimacy Inspection</i> 2017 Stop and Search Concerns	A Member queried when the causes of concern raised under paragraph 7ii of the report, relating to stop and search bias and practices, would be addressed. The Chairman requested that this be tracked as a standalone outstanding action.	CoLP	OUTSTANDING
11.	05/03/18 Item 9 - <i>HMICFRS PEEL</i> <i>Legitimacy Inspection</i> 2017 Community Scrutiny Group, Independent Advisory Group Meeting Dates	A Member queried external scrutiny of stop and search, as referenced within Appendix A. The Chairman requested that the Community Scrutiny Group meeting dates be followed up on, alongside those of the Independent Advisory Group.	CoLP	OUTSTANDING
12.	05/03/18 Item 9 - <i>HMICFRS PEEL</i> <i>Legitimacy Inspection</i> 2017 Vetting Report	A Member queried the repercussions of a vetting refusal. The Chairman stated that it would be useful to have a report on vetting that provided clarity on the following: 1. The re-vetting process; 2. Vetting refusals and their implications (referencing the 6 refusals recorded in Item 10 of the last meeting); and 3. The different levels of vetting and their associated clearances	CoLP	COMPLETE – On the Agenda

13.	<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. 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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Committee(s):	Date:
Professional Standards and Integrity Sub Committee	6 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 23rd May 2018, which is one day past the deadline for submission of papers to your Sub Committee; a verbal update will therefore be provided.

Code of Ethics Update:

The last scheduled meeting of the London Police Challenge Forum (LPCF) took place on the 29th April 2018 with two panels running concurrently, one at Guildhall Yard East and one at Charing Cross.

The Head of Strategic Development has been invited to be a member of the Regional Ethics Board and a newly constituted national group, to be chaired by Chief Constable Julian Williams. The next regional meeting is scheduled for 15th June 2018.

The Integrity Standards Development Plan has been refreshed for 2018 and will be submitted to the Integrity Standards Board for consideration. The plan includes 5 new actions to progress and is attached to this report for information.

The Head of Strategic Development met with the Chief Superintendent I&I to assess the extent to which the staff survey results could inform new dashboard measures and new actions for the Integrity Standards Development Plan. It was agreed there is nothing in the results to inform new indicators, however, there is an opportunity to include one new action, which has been included and relates to an internal ethics board to review decisions and offer advice to other boards and managers.

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 23rd May 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 scheduled meeting of the London Police Challenge Forum (LPCF) took place on the 29th April 2018 with two meetings running concurrently, one at Guildhall Yard East and one at Charing Cross. The meeting at Guildhall Yard East was chaired by the Head of Strategic Development on behalf of the Commander (Operations). The Borough Commander for Westminster chaired the meeting in Charing Cross. Both panels considered the same six ethical issues, which included the following subjects:
 - a. Police officers and membership of the Freemasons;
 - b. Rewards being offered to members of the public to come forward to provide information to support investigations;
 - c. Retaining staff in acting ranks or as volunteers when they have not been successful at a board;
 - d. Voluntary interviews; and

- e. Use of Home Office biometric systems.
- 6. The findings of the panels will be circulated in due course. Members will be aware there have been issues with producing an outcome from the panels, however, it has been agreed that much shorter summaries of the discussions will be produced (compared to the almost verbatim record of discussions) which should facilitate a quicker turnaround than has been experienced to date.
- 7. The question of how these records will be stored and disseminated remains unresolved. There was a proposal that POLKA would be used, however, this has not garnered support from the Regional Leads, therefore alternatives are being explored by the MPS, who maintain a full time resource to support the LPCF.
- 8. The next LPCF is scheduled to take place on the 4th July 2018 and will be hosted by British Transport Police (BTP) and the Metropolitan Police Service (MPS).
- 9. The Head of Strategic Development (HoSD) has met with the other LPCF leads (both Chief Superintendents from the MPS and BTP) and agreed that all 3 should be members of the newly constituted Regional Board, which is being run by Professor MacVean of Bath Spa University. Chief Constable Julian Williams, who is the NPCC lead for this area is also a member of that group. Although the group has already met once (6th March), the next meeting on the 15th June will be the first attended by HoSD.
- 10. It is envisaged that through membership of the regional and national groups, the Force will be able to contribute to and benefit from being part of the latest initiatives at the development stage.

Integrity Standards Development Plan

- 11. The Integrity Standards Development Plan has been reviewed for 2018 and is attached to this report at Appendix B. The Plan remains in two sections covering 'commitment' actions and 'development' actions. The commitment section is intended to ensure that the Force maintains the basic structures to support integrity in the workplace. As these were implemented last year, whilst they are being maintained they will be reflected as 'GREEN'.
- 12. The development section contains 5 new areas:
 - i. Link in and participate in Regional and National boards concerned with the Code of Ethics (shown as GREEN as links have been established, however, to maintain at GREEN HoSD will need to attend, participate in and bring back developments from the groups).
 - ii. Launch an internal board to advise on and review key decisions and processes. This is to support a finding of the Staff Survey around perceived organisational unfairness relating to strategic decisions.
 - iii. To review staff survey and incorporate any relevant recommendations in this development action plan (shown as GREEN as completed, leading to the measure at (ii) above).

- iv. To include a question about public perception of integrity in the annual community survey
 - v. Explore opportunities to include integrity/ethics more explicitly in recruitment processes, particularly at the application/assessment stages
13. Updates against the Plan will be submitted to each ISB for oversight and to your Sub Committee for information.

Staff Survey

14. The Head of Strategic Development met with the Chief Superintendent I&I to assess the extent to which the staff survey results could inform new dashboard measures and new actions for the Integrity Standards Development Plan. It was agreed there is nothing in the results to inform new indicators, however, there is an opportunity to include one new action, which has been included and relates to an internal ethics board to review decisions and offer advice to other boards and managers, and has been included in the Development Plan. To date the concept has been shared with the Senior Leadership Team who are broadly supportive of the proposal.

Benchmarking request to Forces for details of their integrity arrangements.

15. Following the last ISB, Strategic Development wrote to all UK forces requesting information regarding their equivalent integrity boards. To inform further development of the Force's own dashboard, terms of reference were requested together with any details of indicators used.
16. Six forces responded. The results are summarised below:

Force	Details
Cleveland	Have an internal ethics committee. Only standing item is gifts and hospitality, then discusses issues referred to it (similar to LPCF). Issues that CoLP covers (complaints/vetting/business interests etc.) are dealt with by PSD governance group, and grievances/ETs by HR governance group. No indicators supplied.
West Yorkshire	Used to have an integrity board but now embedded in a broader People Board supported by Local Accountability Meetings with all districts and departments – Integrity is a theme. No indicators supplied.
Merseyside	Currently reviewing governance arrangements around their integrity board and new ToRs being drafted. No drafts or indicators shared.
Cheshire	ToR for Force Integrity Meeting supplied (dated Jan 2018). Covers misconduct, grievances, public complaints, vetting management, civil actions, gifts and hospitality, referrals to the IOPC, integrity issues arising from the breach of information security, crime data integrity audits and HMICFRS AFIs.
Hertfordshire	No equivalent board. Their PSD Governance Board covers most of what is included in our dashboard; finance issues monitored by individual finance units and ETs by HR/Legal Services departments. No indicators supplied.

Lincolnshire	No equivalent board. Issues within CoLP's TOR are picked up by other groups (such as IAG and PSD Governance Groups). No indicators supplied.
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17. The volume of returns was disappointing and do not indicate there are any areas being scrutinised by other forces that are not already included on the Force Integrity dashboard.

Crime audits

18. 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.

19. The audit reports are submitted to 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.

20. Over the last quarter (March 2018 to present), the following audits have been completed:

- i. Rape
- ii. Out of court disposals
- iii. Computer Aided Despatch (CAD) records to Crime records (violence)
- iv. Transferred crimes
- v. Cancelled crimes

21. In addition to the above audits, a weekly audit is conducted on all records for any reference to modern slavery offences. No issues relating to integrity have been reported in any of the audits.

Appendices

- Appendix A – Integrity Dashboard (draft – to be considered by the Integrity Standards Board)
- Appendix B – Integrity Standards Development Plan (draft – to be considered by the integrity Standards Board)

Stuart Phoenix

Head of Strategic Development

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NOT PROTECTIVELY MARKED

CITY OF LONDON POLICE

**INTEGRITY
DASHBOARD 2017/18
Quarter 4
Version 1.0**



NOT PROTECTIVELY MARKED

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	2	8
	No integrity issues have been identified in relation to the grievances raised in Qtrs 1 or 2. In terms of the two grievance cases that concluded in Quarter 4, in both cases at Stage 3 the appeals managers did not uphold the individual's grounds for appeal.									
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	2
	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. The board will be duly updated if any integrity issues emerge.									
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	21	90
	There were 21 complaints recorded during the Q4 period and 51 allegations (both excl Action Fraud). Of these 51, the Top 5 National Allegation categories accounted for:- Other assault x 1; Oppressive Conduct/Harassment x 1; Unlawful/unnecessary arrest or detention x 0; Other neglect or failure in duty x 10; Incivility/Impoliteness/ Intolerance x 8.									
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	2	18
	There were 2 civil cases recorded during Q4: - 1 x Non-referral/Inadequate Service re Action Fraud; 1 x Proposed claim for judicial review.									
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	0
	No monitoring exercises leading to investigations.									
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	1	1
	There was 1 assessment made during Q4 relating to overarching investigation.									
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	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	1	3
	There was 1 assessment made during Q4 relating to overarching investigation. The outcomes of the previous quarters were: QTR 1 – Informal words of advice QTR 2 - NFA QTR 4 – Ongoing									

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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	0
	There were 3 Business Interests recorded in Q4 for Police Officers - 1 x Rent and property lease, 1 x business re therapy and 1 x volunteer at sports club (CCU reviews business interests annually). No investigations undertaken – no outcomes									
FORCE INTEGRITY INDICATORS										
Number	Indicator	Historic Levels				Current Levels 2017/18				
10	Number of business Interest Investigations undertaken for support staff	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0	0	0	0	1	0	0	1
	There was 1 Business Interest recorded in Q4 for Civilian Staff - 1 x Rent and property lease (CCU reviews business interests annually).									
11	Number of unregistered CoLP media contacts detected by Corp Comms and reported to PSD	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	2	0	5	0	1	0	0	1
	0 investigations during Q4									
12	Number of investigations undertaken by PSD as a result of PNC/PND dip sampling	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
		1	1	2	0	0	0	0	0	0
	No investigations during Q4									
13	Number of monitoring exercises conducted on gifts and hospitality register entries	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	5	3	8	1	0	0	2	3
	There were 2 assessments during Q4 - 1 as part of an overarching investigation. Download of 09/04/2018 – There were 49 Gifts and Hospitality submissions recorded during Q4 – at the time of download, 34 were showing as accepted, 4 declined and 5 given. Of the 49 entries, 4 related to NPCC, 21 x ECD, 10 x Crime and the remainder spread across the other Directorates.									
14	Number of management issues arising from re-vetting of the workforce	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
				0	0	0	0	0	0	0
	No unsuccessful re-vet applications. 274 new applications, 263 completed applications, 296 Pending applications, 9 refusals. All refusals were a mixture of "Honesty and Integrity" and financial concerns. No management issues arising in any quarter – no outcomes.									
15	Number of procurement purchases assessed by PSD for investigation	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0	2	1	1	2	0	0	3
	0 investigations during Q4.									
16	Number of positive results from testing with cause random drug testing	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
				0	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	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total
					-	-	-	-		-
	Due to staff resource issues and end of year workload Finance are not able to provide any data. It was hope that once Finance is back to full strength the data will be retrospectively provided.									

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POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2018-19 May 2018 update



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INTRODUCTION

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

PLAN SUMMARY

1. Commit Measures	Traffic Light Tracker			
	May 18			
1.1 Force has issued a statement committing to support and embed the Police Code of Ethics	GREEN			
1.2 Maintain the Force Integrity Delivery Plan	GREEN			
1.3 Maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force	GREEN			
1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas	GREEN			
1.5 Define the Force approach to corruption within appropriate Standard Operating Procedures and supporting statements	GREEN			
1.6 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes	GREEN			
1.7 Maintain a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates)	GREEN			
1.8 Maintain a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan	GREEN			
1.9 Ensure training on standards, values and leadership ethics is available for all staff	GREEN			
1.10 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures	GREEN			

2. Development Measures	Traffic Light Tracker			
	May 18			
2.1 Link in and participate in Regional and National boards concerned with the Code of Ethics	GREEN			
2.2 Launch an internal board to advise on and review key decisions and processes	WHITE			
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	WHITE			
2.4 To review staff survey and incorporate any relevant recommendations in this development action plan	GREEN			
2.5 To include a question about public perception of integrity in the annual community survey	WHITE			
2.6 Explore opportunities to include integrity/ethics more explicitly in recruitment processes	WHITE			

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PERFORMANCE REPORT

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

Target Report Checklist

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

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1. COMMITMENT CRITERIA	
MEASURE	1.1. Force has issued a statement committing to support and embed the Police Code of Ethics
OWNER	Head of Strategic Development
AIM/RATIONALE	The Commissioner will make a statement committing the Force to supporting and embedding the Police Code of Ethics and set out the framework for the management of integrity within the organisation
DUE DATE	March 2018
MEASUREMENT	Record date and document statement is issued within and to be reviewed annually
TRAFFIC LIGHT CRITERIA	Green: Statement Issued. Amber: Statement being drafted. Red: Statement not issued or out of date by more than three months
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>The Force's commitment to the Police Code of Ethics is included prominently in all Force strategic level publications (Corporate Plan 2018-2023, Policing Plan 2017-2020, Force-level strategies and Policies).</p> <p>For the Policing Plan, this has been developed to link the Code's principles more explicitly to the Force values of Integrity, Fairness and Professionalism. It also includes reference to the internal processes to manage integrity within the organisation, i.e. the work of the Integrity Standards Board and scrutiny function of the Police Professional Standards and Integrity Sub Committee.</p> <p>A statement has also been included in the draft Force Annual Report.</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.2 To maintain the Force Integrity Delivery Plan
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure work relating to integrity, including the continued embedding of the Police Code of Ethics, progresses and is reported routinely to the Integrity Standards Board and Police Professional Standards and Integrity Sub Committee.
MEASUREMENT	Existence of a plan which is reported to ISB quarterly
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Plan exists Amber: Plan being drafted. Red: Plan not issued or out of date by more than three months
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>This plan has been in existence since 14th November 2016 and is being reported to each Integrity Standards Board and Professional Standards and Integrity Sub Committee.</p> <p>It has been reviewed to include new development measures for 2018.</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.3 To maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force
OWNER	Head of Strategic Development
AIM/RATIONALE	To monitor activities relating to workforce and organisational integrity and drive activity with regard to integrity and transparency.
MEASUREMENT	Group exists, meets regularly and provides reports to the Professional Standards and Integrity Sub Committee
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Group exists and meets regularly. Amber: Group exists but has not met for over 3 months. Red: Group doesn't exist or has not met for 6 months
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>The Integrity Standards Board is now established; it is chaired by the Assistant Commissioner, attended by all directorates and representatives from the Town Clerk's Department and Police Committee. The meetings are quarterly and minuted.</p> <p>The last meeting was 28th February 2018.</p> <p>The current meeting is on 23rd May 2018.</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.4 To maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas
OWNER	Directorate Heads (Head of Strategic Development to coordinate)
AIM/RATIONALE	To ensure Directorates are fully linked into integrity monitoring and activities that support the continued development of integrity within the Force.
MEASUREMENT	Directorate SPOCs exist and attend Integrity Standards Board (ISB).
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Directorate representation exists and attends ISB Amber: Directorate SPOCs exist but Directorates have not been represented at 1 ISB Red: Directorate representation does not exist or directorates have not been represented at 2 or more consecutive meetings.
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>Directorate SPOCs exist for all directorates and are written into ISBs terms of reference. If the SPOC cannot attend ISB, they are required to arrange suitable representation at an appropriate level. All Directorates now have SPOCs.</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.5 To have defined the Force approach to corruption within appropriate Standard Operating Procedures (SOPs) and supporting statements
OWNER	Head of Professional Standards
AIM/RATIONALE	To ensure the Force approach to corruption is clearly documented and communicated to all staff and the public, supporting a culture of confidence within the Force in reporting suspected corruption and challenging behaviour and transparency
MEASUREMENT	Relevant SOPs (investigation and sanctions) detail Force approach to corruption and Commissioner has issued a statement as part of the Force's commitment to the ACPO (Association Of Chief Police Officers, now the National Police Chiefs Council) Police Integrity Model detailing the zero tolerance approach
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Position articulated and published. Amber: Process in development Red: No process or past the due by date by 3 months or more
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>The Force has a robust approach to counter corruption. This message has been communicated through a variety of methods, including intranet articles and workshops. There is a current anti-corruption SOP and Control Strategy. Safecall provides a secure and anonymous reporting system where the workforce can report any concerns, which has been reinforced by intranet articles.</p> <p>PSD is specifically feeding into the strategic processes to identify (and thereafter manage) threat, risk and harm, and includes counter corruption amongst other PSD-related issues.</p> <p>A quarterly Professionalism newsletter has been and launched and includes articles around raising awareness of corruption as well as promoting positive, acceptable behaviours.</p> <p>The Force is currently (May 2018) exploring collaboration opportunities with the British Transport Police relating to counter corruption.</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.6 To have established a process for internally and externally communicating corruption /integrity/ misconduct outcomes
OWNER	Director of Professional Standards
AIM/RATIONALE	To support the transparency, facilitate organisational learning and provide confidence that the force is openly addressing issues relating to corruption, integrity and misconduct. .
MEASUREMENT	Process established and maintained
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Process established and being used. Amber: Process established but not being consistently used Red: No process or process routinely not used
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>There is a process in place to publish the outcomes of hearings internally in sufficient detail to identify organisational learning, The results of misconduct hearings that are held in n public are also published on the public website (last published results 5th October 2017) (checked 16th May 2018)</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.7 To have established a process to support the Force's participation in the London Panel Challenge Forum (LPCF) (Ethics Associates)
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure the Force is fully engaged in the regional tri-force ethics challenge panel, promoting organisational learning and providing support to officers and staff in ethical decision making.
MEASUREMENT	Process in place and being used.
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Process in place and being used. Amber; Process in development. Red: Process in place but not being used or no process in existence past due date
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>The formal launch of the London Panel Challenge Forum took place on 15th December 2016.</p> <ol style="list-style-type: none"> 1. The most recent panel took place on 29th April 2018. CoLP hosted one of the panels, chaired by the Head of Strategic Development in the T/Cdr Ops & Security's absence. The other panel was hosted by the MPS in chaired by the Borough Commander for Westminster. 	

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1. COMMITMENT CRITERIA	
MEASURE	1.8 To have appointed a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure chief officer ownership and oversight of ethical and integrity issues within Force
MEASUREMENT	Chief officer lead appointed
DUE BY	March 2018
TRAFFIC LIGHT CRITERIA	Green: Chief officer lead appointed and active Amber: Chief Officer lead appointed but not active in role Red: No chief officer lead. .
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>The Assistant Commissioner is the Chief Officer lead for integrity matters in force. In addition to chairing the Integrity Standards Board, they also chair the Organisational Learning Forum, the Crime Data Integrity Oversight Board and lead on the associated area of Professional Standards. They are held to account by the Commissioner, the Grand Committee and the Professional Standards and Integrity Sub Committee.</p> <p>The Commander (Operations) additionally chairs London Police Challenge Forum panels for additional resilience.</p>	

NOT PROTECTIVELY MARKED

1. COMMITMENT CRITERIA	
MEASURE	1.9 To ensure training on standards, values and leadership ethics is available for all staff
OWNER	Director of Human Resources
AIM/RATIONALE	To ensure staff are supported in their duty to uphold the Force's integrity standards
MEASUREMENT	Our recruitment and promotion processes will contain references to how integrity standards will be used as part of the assessment criteria for recruitment of new officers within the Force and for promotion of existing officers
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Training courses are fully available within a rolling yearly programme. Amber: Training courses are still in development. Red: No training courses are available.
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>Information on standards, values and leadership is available to all staff on the intranet.</p> <p>All courses, Inspectors, Sergeants, Custody, Personal Safety Trainers etc provide advice and guidance on standards and integrity.</p> <p>A major aspect of the Probationer programme is ensuring students uphold the force integrity standards, not only delivered by Learning & Development trainers but also Professional Standards Department.</p> <p>Specials initial courses receive input on standards and integrity.</p> <p>All training courses have been reviewed to ensure they incorporate the national College of Policing Code of Ethics. The Code of Ethics forms a discrete element of induction training, which includes written information and face to face presentations.</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.10 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures
OWNER	Directorate Heads (co-ordinated by Head of Strategic Development)
AIM/RATIONALE	To ensure the Force complies with national standards with regard to policies and Standard Operating Procedures
MEASUREMENT	Strategic Development will maintain a watching brief on published APP to ensure all new/revised APP is considered by Policy owners.
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: APP adopted or force position reviewed against APP. Amber: APP introduced and review is required RED: APP not considered
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>When Authorised Professional Practice (APP) was introduced by the College of Policing, the Force committed to adopt the APP in full where that could be done. Where full adoption could not take place (due to City-specific circumstances), Policy owners were required to review force procedures against the APP to ensure there was no conflict and that force processes reflect national best practice. This has been done for all currently published APP and is up to date (as at May 2018).</p> <p>APP relates principally to operational processes and there is currently very limited APP that relates to those areas that most impacts on integrity (e.g. gifts and hospitality, expenses, use of telephones/IT systems, sponsorship etc.). Strategic Development checks the College of Policing APP site monthly to identify any revised or new APP to ensure it is considered by the Force. Any such identified APP will be reported as part of this action plan.</p>	

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2. Development Measures	
MEASURE	2.1 1 Link in and participate in Regional and National boards concerned with the Code of Ethics
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure that the Force is able to contribute to and benefit from latest developments in ethical policing
MEASUREMENT	Head of Strategic Development to provide ISB with details of activities supporting this measure
DUE BY	QUARTERLY UPDATES to ISB
TRAFFIC LIGHT CRITERIA	Green: Active participation and new initiatives identified Amber: Intermittent participation. Red: No participation
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>Head of Strategic Development has requested to be a member of the Regional Ethics Group (first meeting is 15th June 2018 at Bath Spa University) and will be included in the first national meeting to be chaired by Chief Constable of Gwent Police (date not yet set).</p>	

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2. Development Measures	
MEASURE	2.2 Launch an internal board to advise on and review key decisions and processes
OWNER	Head of Strategic Development/Ch. Supt I&I
AIM/RATIONALE	One of the issues highlighted by the Staff Survey 2017 was a perception of organisational unfairness. This board would promote transparency and help to influence organisational behaviours.
MEASUREMENT	Existence of a board that produces useful information/advice to other boards/managers/policy developers.
DUE BY	July 2018
TRAFFIC LIGHT CRITERIA	Green: Board established and meeting to a schedule; AMBER: Board established but meeting ad hoc; RED: Board not yet established
TRAFFIC LIGHT	WHITE
CURRENT POSITION	
<p>Ch. Supt I&I recently attended a national event relating to Staff Surveys where good practice disseminated by Devon & Cornwall Police included a discussion about internal boards that discuss referrals made about corporate/organisational decisions and publish their findings. They have found this has helped to influence the quality of decision making from an ethical perspective.</p> <p>Last year (2017) we included code of ethics considerations into report templates. This board would fulfil two purposes:</p> <ol style="list-style-type: none"> (1) It would indicate the level of success of the action already taken with regard to changes to the template referred to above; and (2) It would support addressing one of the findings of the staff survey re perceived organisational unfairness 	

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2 Development Measures	
MEASURE	2.3 Conduct an annual review of the Force integrity programme and implement identified improvements
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure the Force continues to develop its approach to integrity and has plans to embed best practice.
MEASUREMENT	Review completed and reported to ISB
DUE BY	October 2018
TRAFFIC LIGHT CRITERIA	Green: Review complete and action plan amended Amber: review complete but action plan unamended or review overdue by 1-3 months Red: Review overdue by 3 months or more with unamended action plan.
TRAFFIC LIGHT	WHITE
CURRENT POSITION	
This plan and the broader Ethics agenda to be formally reviewed to inform developments for 2019.	

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2 Development Measures	
MEASURE	2.4 To review staff survey and incorporate any relevant recommendations in this development action plan
OWNER	Head of Strategic Development / Ch. Superintendent I&I
AIM/RATIONALE	To inform development of this plan and address concerns raised in the Staff Survey.
MEASUREMENT	Review complete and action plan amended
DUE BY	March 2018
TRAFFIC LIGHT CRITERIA	Green: Review complete and action plan amended Amber: review complete but no changes to action plan. Red: review not yet complete
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>The last Staff Survey was completed by mid 2017. Several indicators within the survey were based on perceptions of organisational fairness and integrity. The Ch.Supt I&I holds responsibility for ensuring that the findings of the survey are implemented. When the survey was being set and conducted, it was envisaged that the results would inform development of this plan; following receipt of the results, the Head of Strategic Development met with Ch. Supt I&I to ascertain the extent to which this could be done.</p> <p>Reviewing the results it was clear that hardly any issues were raised which reflected poorly on organisational integrity; the only such area was a perception of organisational unfairness regarding decisions made at a strategic level. A measure to address that has therefore been included in this plan (2.3).</p> <p>The results were also reviewed to see if there was an opportunity to introduce new integrity indicators into the Integrity Dashboard, however, the Head of Strategic Development and Ch.Supt I&I agreed there is not anything in the survey that would support this.</p>	

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2 Development Measures	
MEASURE	2.5 To include a question about public perception of integrity in the annual community survey
OWNER	Corporate Communications Director
AIM/RATIONALE	To provide the Force with a baseline indicator of the public's perception of the extent to which the force acts with integrity.
MEASUREMENT	Question(s) included in survey
DUE BY	December 2018
TRAFFIC LIGHT CRITERIA	Green: Question included in survey and results acted on; Amber: Question included but results not acted on; Red: Question not included
TRAFFIC LIGHT	WHITE
CURRENT POSITION	
<p>The annual survey of the City of London Community to due to take place across September/October 2018 (hence the due date of December). It is proposed to work up a question that indicated the level of public perception that the City of London Police acts with integrity. Where a respondent indicates that they do not think the Force does, they will be invited to provide specific reasons for that view.</p>	

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2 Development Measures	
MEASURE	2.6 Explore opportunities to include integrity/ethics more explicitly in recruitment processes
OWNER	Head of Organisational Development / HR Director
AIM/RATIONALE	To build on work done last year relating to including code of ethics integrity into new recruit/staff induction processes.
MEASUREMENT	Changes made to processes
DUE BY	July 2018 (with regard to proposals) and September 2018 (for implementation)
TRAFFIC LIGHT CRITERIA	Green: Proposal made and being implemented. Amber: Proposals made but not yet implemented Red: No proposals made by the due date.
TRAFFIC LIGHT	WHITE
CURRENT POSITION	
<p>Best practice from some forces (e.g. Devon and Cornwall) highlights how they have incorporated a more robust ethical dimension in their recruitment, which includes requiring candidates to address questions around integrity at the application and assessment stages of the process. The proposal is to assess the extent to which the force can introduce something similar, and if feasible, implement it.</p>	

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Annex A: glossary of terms

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Investigation outcomes:

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

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

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

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

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

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

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

be found in the IOPC's Statutory Guidance.

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

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

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

Discontinuance appeal: An appeal may be made to the relevant appeal body against the decision by a police force to discontinue the investigation into a complaint. There is no right of appeal where the complaint subject of the investigation discontinued relates to direction and control, where the IOPC has given permission for the discontinuance or if the discontinuance is carried out by the IOPC in relation to a supervised investigation. Invalid appeals: There are a number of reasons why an appeal may be judged to be invalid. These are:

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

appeal complete.

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

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

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

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

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

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

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

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

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

Misconduct: A breach of the Standards of Professional Behaviour

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

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

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

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

Unsatisfactory Performance Procedures

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

Police Terminology

IOPC: Independent Office of Police Conduct

AA: Appropriate Authority

DSI: Death or Serious Injury

SIO: Senior Investigating Officer

MPS: Metropolitan Police Service

DPS: Directorate Professional Standards
(Metropolitan Police Service)

TFG: Tactical Firearms Group

MIT: Major Investigation Team

NFA: No Further Action

UPD: Unformed Policing Directorate

ECD: Economic Crime Directorate

I&I: Intelligence and Information Directorate

PNC: Police National Computer

ANPR: Automatic Number Plate Recognition

UNIFI: City of London Crime and Intelligence Database

CAD: Computer Aided Dispatch

PMS: Property Management System

TfL: Transport for London

STOT: Safer Transport Operations Team

TPH: Taxi and Private Hire

PHV: Private Hire Vehicle

PCO: Public Carriage Office

PIN: Police Information Notice

BWV : Body Worn Video

SAR: Subject Access Request

SOP : Standard Operating Procedure

FI: Financial Investigator

SAR: Suspicious Activity Report

POCA: Proceeds of Crime Act

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