



Professional Standards and Integrity Sub (Police) Committee

Date: MONDAY, 17 SEPTEMBER 2018

Time: 1.45 pm

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

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

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Next Meetings:

7 Dec 2018

11 Mar 2019

3 June 2019

9 Sep 2019

N.B. Part of this meeting may be subject to audio-visual recording.

Lunch will be served in the Guildhall Club at 1.00pm.

**John Barradell
Town Clerk**

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 minutes of the last meeting, held on 6 June 2018.

For Decision

(Pages 1 - 6)

4. **OUTSTANDING REFERENCES**

Report of the Town Clerk.

For Information

(Pages 7 - 10)

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

Report of the Commissioner of Police.

For Information

(Pages 11 - 40)

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

7. **QUESTIONS RELATING TO THE WORK OF THE COMMITTEE**

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.

Item No.	Paragraph(s) in Schedule 12A
9,10,11, 13-17, 19, 20	3
12, 17	1, 2
17	5

For Decision

9. **NON-PUBLIC OUTSTANDING REFERENCES**

Report of the Town Clerk.

For Information

(Pages 41 - 42)

10. **NON-PUBLIC MINUTES**

The agree the non-public minutes from the last meeting, held on 6 June 2018.

For Decision
(Pages 43 - 48)

11. **BWV DEMONSTRATION**
The Commissioner to be heard.

For Information

12. **PROFESSIONAL STANDARDS STATISTICS Q1**
Report of the Commissioner of Police.

For Information
(Pages 49 - 78)

13. **MISCONDUCT HEARINGS**
Report of the Commissioner of Police.

For Information
(Pages 79 - 80)

14. **CASE TO ANSWER / UPHELD**
Report of the Commissioner of Police.

For Information
(Pages 81 - 90)

15. **NO CASE TO ANSWER / NOT UPHELD**
Report of the Commissioner of Police.

For Information
(Pages 91 - 120)

16. **COMPLAINTS BULLETIN Q1**
Report of the Commissioner of Police.

For Information
(Pages 121 - 134)

17. **EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES**
Report of the Comptroller and City Solicitor.

For Information
(Pages 135 - 144)

18. **GLOSSARY**
Report of the Commissioner of Police.

For Information
(Pages 145 - 150)

19. **ANY OTHER NON-PUBLIC BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
20. **NON-PUBLIC QUESTIONS RELATING TO THE WORK OF THE COMMITTEE**

PROFESSIONAL STANDARDS AND INTEGRITY SUB (POLICE) COMMITTEE

Wednesday, 6 June 2018

Minutes of the meeting of the Professional Standards and Integrity Sub (Police) Committee held at the Guildhall EC2 at 10.30 am

Present

Members:

Alderman Alison Gowman (Chairman)	Mia Campbell (External Member)
Nicholas Bensted-Smith	Deputy James Thomson (Ex-Officio Member)

Officers:

Maria Woodall	- Director of Economic Crime, CoLP
Oliver Bolton	- Town Clerk's Department
George Fraser	- Town Clerk's Department
Alistair Sutherland	- Assistant Commissioner, City of London Police
Marshah Dixon-Terry	- City of London Police
Julia Perera	- CoLP
Angela Rogers	- CoLP

1. APOLOGIES

Apologies were received from Tijs Broeke.

The Chairman noted that Lucy Sandford had resigned from the Police Committee, and subsequent role on the Sub-Committee. She thanked her for her valuable contribution.

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 Monday 5 March 2018.

RESOLVED – That the minutes be approved.

4. OUTSTANDING REFERENCES

The Sub-Committee received a report of the Town Clerk that provided Members with a summary of the outstanding actions from previous meetings.

OR1 – Gifts and Hospitality Report

The Director of Professional Standards noted that this had been updated on the CoLP website, and asked Members if it was sufficiently visible. Members agreed that it was reasonably straightforward to locate now.

OR2 – Body Worn Video Demonstration

The Chairman asked for confirmation that this demonstration would take place at the next meeting of the Sub-Committee in September. The Director of Professional Standards confirmed that it would.

OR4 – Force Leadership Changes Update

Members noted that the CoLP organigram was circulated and the Assistant Commissioner explained that updates on leadership personnel would only be provided on a monthly basis if there had been any changes to note. The Chairman agreed that this was the correct approach.

RESOLVED – That the report be received.

OR5 – National Association of Legally Qualified Chairpersons for Police Misconduct Panels

The Director of Professional Standards and the Town Clerk explained that they had both made considerable attempts to engage with the Association but had not had any success. The Chairman accepted that efforts had been made and agreed that the action should now be closed.

OR7 – Staff Survey Action Plan

The Chairman noted that the Detective Chief Superintendent of Intelligence and Information submitted his apologies as was unable to attend the meeting as planned due to a CoLP engagement.

The Assistant Commissioner explained that the action plan will be formulated prior to the next meeting. The Chairman requested that it be submitted to the next meeting. (1)

OR8 - Legitimacy Action Plan

The Town Clerk tabled a copy of the Performance and Resource Management Sub Committee report that summarised HMICFRS recommendations for improvement from the recent Legitimacy inspection of CoLP. The Head of Strategic Development explained that the only category marked as “RED” was the use of stop and search, and noted that this was impacted by an issue with the PRONTO system that is used for the recording of crimes. Members queried how this was related to NICHE, and the Head of Strategic Development explained that NICHE was a core system that interfaces with a range of other systems, such as PRONTO, which are not necessarily synchronised with other Police forces.

The Assistant Commissioner explained that there were a list of identified actions that CoLP were working through. The Chairman of the Performance and Resource Management Sub-Committee noted that an issue highlighted at that Sub-Committee was the 14% of officers rated as having completed training

for Stop and Search. The Assistant Commissioner noted that this was unsatisfactory and explained that CoLP were planning to produce a briefing note updating Members on the training plan that was in place. He agreed to circulate to Members of the Sub-Committee. He noted that the level of complaints around stop and search had not seen an increase regardless. (2)

A Member asked if the training aimed at addressing unconscious bias was online. The Assistant Commissioner confirmed that this was the case.

The Chairman noted that the briefing note should be circulated to the Police Committee's Equality and Diversity Lead that had given his apologies for this meeting.

OR9 – New Complaints Procedure

The Chairman asked if the planned changes to the complaints procedure had been made. The Director of Professional Standards confirmed that they had and that there had subsequently been a significant drop in complaints received around Action Fraud.

OR10 – Stop and Search Concerns

It was agreed that this was now being addressed and should be closed.

OR11 – Community Scrutiny Group (CSG) and Independent Advisory Group (IAG) Meeting Dates

The Chairman asked if the dates had been confirmed for both these groups. The Assistant Commissioner explained that CSG dates had been confirmed, but that the IAG dates had not been for the remainder of 2018. The Chairman asked that the Equality & Diversity Lead should be kept updated with these dates. (3)

RESOLVED – That the report be received.

Post Incident Procedure (PIP)

The Sub-Committee received a verbal update from a CoLP Post-Incident Manager (PIM) on Post-Incident Procedures (PIP).

The Post-Incident Manager explained that a Post-Incident Procedure would be actioned following a range of adverse events that may occur whilst Police officers are carrying out their duty, such as the discharge of a firearm. She explained that chief officers would be notified immediately following the incident, and that CoLP would then make provisions for the management of the staff member involved to ensure that they are supported throughout the process by a Post-Incident Manager.

The Post-Incident Manager explained that they were staff members not solely dedicated to this task, though they were required to have a range of skills and competencies to fill the role, such as: empathy, commitment, independence and strong communication.

The Post-Incident Manager provided Members with the 2016 London Bridge Terror Attack as an example where a Post-Incident team consisted of both CoLP and Metropolitan Police Service (MPS) officers. She highlighted the challenge in managing the inherent pressure that officers face given IOPC involvement. She emphasised the importance of anonymity throughout the process to enable subjects to continue their daily life and work. She also noted the requirement for PIM's to provide updates to the subject on hearing dates and help ensure that the best evidence is provided in court, particularly in the case of the London Bridge Terror Attack, which would be heard on 6 July in January 2019 at the Central Criminal Court. She noted that the officers involved in this case were currently in a "good place".

Members questioned the level of awareness of the Post-Incident Procedure from amongst CoLP staff. The Post-Incident Manager explained that all firearms officers were well aware of the process, and assured members that there was now much improved awareness amongst non-firearms officers.

A Member asked how many recorded "incidents" had occurred over the last 5 years. The Post-Incident Manager explained that PIM's would only be aware of those incidents that they themselves are involved in. The Assistant Commissioner explained that the exact figure would have to be confirmed but noted that there was steadily increasing use of PIP, likely resulting from the influx of staff from MPS where it had been well established.

The Chairman thanked the Post-Incident Manager for the informative update.

5. 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 CoLP's Integrity Dashboard and Code of Ethics.

The Head of Strategic Development explained that a summary of meetings had not been included due to the timing of the agenda submission deadline prior to the meeting of the Integrity Standards Board. He explained that the dashboard was well received at that meeting on 23 May, and the performance of CoLP was deemed to be stable. He noted that an action from the meeting raised by the Assistant Commissioner was the question of ethical crime recording.

The Head of Strategic Development explained that the London Police Challenge Forum (LPCF) was well attended on 29 April. The Chairman noted that the lack of minutes/notes being circulated following the meeting was a real concern. The Head of Strategic Development agreed and noted that there wasn't any perceivable reason why they could not be. He noted that many of the issues covered could be overlooked as minor, though cumulatively have a significant impact on Police performance.

The Chairman suggested that it would be valuable for Members to attend the next meeting on 5 July and requested that the Town Clerk circulate the details to Members. A Member asked that the meeting outcomes also be circulated to Members. (4)

The Chairman asked if Crime Audits were ongoing, and the Head of Strategic Development confirmed that they were. The Assistant Commissioner explained that the procedures for the recording of crime had been amended on 1 May, with the Force Control Room now taking incoming crimes directly. He explained that CoLP were employing a more forensic approach to their first contacts on crimes. He noted that CoLP had received a rating of “inadequate” for crime reporting, and in an effort to correct this, there would likely be an increase in reported crime rates. He explained that the central challenge was around the prioritisation of crimes. The Chairman asked if this issue would feature in a report to Police Committee on 12 July, and the Assistant Commissioner noted that this was a possibility. He noted that an unexplained rise in crime figures which could result, may have a detrimental effect on officers’ confidence.

In reference to Business Interest investigations cited within the Integrity Dashboard, a Member asked whether scores of “0” were reliable, or were indicative of a lack of resource available to monitor thoroughly. The Director of Professional Standards confirmed that all the figures were representative as each Business Interest was being checked.

The Chairman noted that measure No.17- *Identified Breaches of the Donations and Sponsorship SOP* had data missing and this was a result of a lack of staffing resource. The Assistant Commissioner confirmed that CoLP’s finance function was now at full strength, with an interim Finance Director appointed for 6-months. He explained that a financial tasking meeting would take place every Monday morning and so he was confident that CoLP were now in a stronger position. The Chairman asked that measure No.17 – *Identified Breaches of the Donations and Sponsorship SOP* be marked as an outstanding action. (5) The Head of Strategic Development explained to Members that this log was kept with the aim of providing reassurance and explained that they were generally happy and would ensure to keep it high on CoLP’s agenda.

RESOLVED – That the report be received.

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

The Chairman requested that the Professional Standards Newsletter be circulated to Members as a matter of course. (6)

7. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There was no urgent business.

8. 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 Schedule 12A of the Local Government Act.

Item No.
9-19

Paragraph(s) in Schedule 12A
3

The meeting closed at 12.22 pm

Chairman

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PROFESSIONAL STANDARDS & INTEGRITY SUB (POLICE) COMMITTEE

17 SEPTEMBER 2018

OUTSTANDING REFERENCES

No.	Meeting Date & Reference	Action	Owner	Status
1.	<p>06/06/18 Item 4 - <i>Outstanding References</i></p> <p>05/03/18 (7) Item 8 - <i>Staff Survey Update</i></p> <p>Staff Survey Action Plan</p>	<p>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.</p> <p>06-06-18: The Chairman noted that the Detective Chief Superintendent of Intelligence and Information submitted his apologies as was unable to attend the meeting as planned due to a CoLP engagement. The Assistant Commissioner explained that the action plan will be formulated prior to the next meeting. The Chairman requested that it be submitted to the next meeting.</p> <p>Update 07-09-18: DCS Evans has liaised with the Chairman regarding his non-availability to attend the meeting on the 17th September. The responsibility for producing the action very recently transferred to Strategic Development, who are now leading on its production. Although it is not yet in a complete enough state to submit to the Sub Committee, the work is being completed and details will be provided to your November Sub Committee.</p>	CoLP	DUE SEPTEMBER 2018

2.	<p>06/06/18 Item 4 - <i>Outstanding References</i></p> <p>05/03/18 (10) Item 9 - <i>HMICFRS PEEL Legitimacy Inspection 2017</i></p> <p>Stop & Search</p>	<p>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.</p> <p>06-06-18: The Chairman of the Performance and Resource Management Sub-Committee noted that an issue highlighted at their last meeting was the 14% of officers rated as having completed training for Stop and Search. The Assistant Commissioner noted that this was unsatisfactory and explained that CoLP were planning to produce a briefing note updating Members on the training plan that was in place. He agreed to circulate to Members of the Sub-Committee. He noted that the level of complaints around stop and search had not seen an increase regardless.</p>	CoLP	<p>COMPLETE –</p> <p>Circulated via email on 06/09/18</p>
3.	<p>06/06/18 Item 4 - <i>Outstanding References</i></p> <p>05/03/18 (11) Item 9 - <i>HMICFRS PEEL Legitimacy Inspection 2017</i></p> <p>Community Scrutiny Group, Independent Advisory Group Meeting Dates</p>	<p>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.</p> <p>06-06-18: The Chairman asked if the dates had been confirmed for both these groups. The Assistant Commissioner explained that CSG dates had been confirmed, but that the IAG dates had not been for the remainder of 2018. The Chairman asked that the Equality & Diversity Lead should be kept updated with these dates.</p> <p>Update 07-09-18: Upcoming dates confirmed as below. Attendance at both meetings is poor, therefore the Force's Equality lead is currently reviewing this area at the request of the Commissioner and Assistant Commissioner, with a view to amalgamating the groups to form a single scrutiny group for the City of London.</p> <p>Community Scrutiny Group – 26 Sep, 29 Dec Independent Advisory Group – 10 Oct, 9 Jan, 3 Apr, 26 Jun</p>	CoLP	<p>COMPLETE</p>

4.	06/06/18 Item 5 - <i>Integrity Dashboard and Code of Ethics Update</i> London Police Challenge Forum (LPCF)	<p>The Chairman suggested that it would be valuable for Members to attend the next meeting on 5 July and requested that the Town Clerk circulate the details to Members.</p> <p>A Member asked that the meeting outcomes also be circulated to Members.</p> <p>Update 07-09-18: The meeting on 5th July was not held in the City of London. The next meeting is the 12th September at 10:00 at CH Rolph Hall. Should anyone wish to attend, please RSVP to Paul Adams (Paul.Adams@cityoflondon.pnn.police.uk). Outcomes have still not been provided by the MPS for the panels held so far. This is still being actively pursued by the Head of Strategic Development.</p>	CoLP/ Town Clerk	OUTSTANDING
5.	06/06/18 Item 5 - <i>Integrity Dashboard and Code of Ethics Update</i> Donations / Sponsorship SOP Breaches	<p>The Chairman asked that measure No.17 – Identified Breaches of the Donations and Sponsorship SOP be marked as an outstanding action.</p> <p>Update 07-09-18: There have been no reported breaches the Donations and Sponsorship Policy and this has been reflected in the current draft Dashboard (not yet considered by the Force's Integrity Standards Board).</p>	CoLP	COMPLETE
6.	06/06/18 Item 6 - <i>Questions</i> Professional Standards Newsletter	<p>The Chairman requested that the Professional Standards Newsletter be circulated to Members as a matter of course.</p>	CoLP	OUTSTANDING

7.	<p>05/03/17 (2) Item 4 - <i>Outstanding References</i></p> <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> <p>05-02-18: This was postponed to the September meeting.</p>	CoLP/ Town Clerk	ON THE AGENDA
8.	<p>05/06/17 (13) 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>16-11-17: 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> <p>Update 07-09-18: It has previously been reported to the Sub Committee that the Staff Survey results were considered by the Head of Strategic Development and the DCS I&I and there was nothing in the survey that was amenable to use as an integrity indicator for the dashboard. This has been reported to the Integrity Standards Board and is reflected in the Integrity Development Plan. As the action plan, however, is still not complete, it is not possible to say whether it will produce anything that is suitable for dashboard inclusion.</p>	CoLP	<p>ONGOING –</p> <p>Update received 16/11/17</p>

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 (ISB) on 27th September 2018. It is therefore included in draft for Members' information, noting that it will not have been considered by the Board before your Sub Committee. It is not possible to provide an update of the ISB for the same reason.

Code of Ethics Update:

The last scheduled meeting of the London Police Challenge Forum (LPCF) took place on the 5th July 2018 at Charing Cross, London. Four dilemmas were discussed. No results have yet been published.

The next meeting is being hosted by the City of London Police at Wood Street. Three panels are being held, one of which will be chaired by the Commander (Operations).

The Head of Strategic Development is now a member of both the Regional Ethics Board and a newly constituted National group, both chaired by Chief Constable Julian Williams. The next meetings are scheduled for 11th October 2018 (Regional) and 12th October (National).

The Integrity Standards Development Plan is also included for information; however, as the Integrity Dashboard, it has not been considered by the ISB prior to its submission to your Sub Committee. There are two actions currently shown as RED, one relating to a proposal to set up an internal board, for which there is not universal agreement; and one relating to a more explicit reference to integrity within the recruitment process. Both are RED as the due date of July 2018 has passed, however, both are being progressed.

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 Development 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 27th September 2018, which follows your Sub Committee.
4. Members are therefore asked to note therefore that neither the dashboard at Appendix A, nor the Development Plan at Appendix B have been considered by the Board and is presented here for information only.

Code of Ethics Update

5. The last scheduled meeting of the London Police Challenge Forum (LPCF) took place on the 5th July 2018 Charing Cross and was chaired by the Westminster Borough Commander. Four ethical issues were discussed on the following subjects:
 - a. Inconsistent use of Home Office Biometric systems (ID technology) based on spending priorities;
 - b. Officers offering other officers money to change allocated shifts/duties;
 - c. Staff taking public credit for a team effort where their contribution was minimal; and
 - d. Should the police service make representations that male circumcision should be regarded in the same way a female genital mutilation.

6. The findings of the panels have not been circulated. This is an ongoing issue that the Head of Strategic Development is continuing to pursue with the LCPF co-ordinator. It is understood the summaries of the panel have been completed, however, have not been signed off/approved by all the Chairs of the panels, preventing their distribution. Representations have been made that this is likely to damage the credibility of the panels, not only with those taking part but also those considering submitting dilemmas.
7. The next LCPF is scheduled to take place on the 12th September 2018 and will be hosted by the City of London Police. Three panels will run concurrently, one will be chaired by the Force's Commander (Operations). Due to the lack of new dilemmas being submitted (potentially and partially for the reasons outlined in paragraph 6), the panels will re-consider dilemmas that have already been debated; however, as panel members are rostered to particular meetings, it is unlikely they individuals will be considering the same dilemmas they have previously. This LCPF is therefore being treated more as a 'validation' exercise of previous findings. A table of independent observers will also be present.
8. The Head of Strategic Development attended the last national meeting hosted by Bath Spa University 14th June 2018. The meeting was also attended by HMICFRS, who provided high level details of their proposed approach to the legitimacy aspect of the forthcoming Integrated PEEL Assessment (November 2018). At the time of the meeting, the group was still in its early stage of operation, there were therefore a significant number of administrative details discussed focusing on terms of reference and how the regional groups will interact and support each other. It was also agreed that a representative from the IPCC would be invited to be part of the group. The group will meet quarterly, with the next meeting scheduled for 12th October 2018 and will be attended by the Head of Strategic Development.

Integrity Standards Development Plan

9. The Integrity Standards Development Plan 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'.
10. Of the five new areas contained within the plan, two are currently shown as RED, as detailed below. Both areas are RED as the due date of July 2018 has passed, however, work has been done on each area.
 - i. *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.* Discussions around implementing this proposal have been led by the Chief Superintendent of Intelligence and Information Directorate. The proposal has not been universally supported; some believe the current mechanisms in place (e.g. prompts on strategic board templates to

consider Code of Ethics implications on proposals or decisions requested) are sufficient, and there are other avenues where individuals can challenge decisions. The matter will be discussed more fully at the next ISB for a decision of whether it should be progressed.

- ii. *Explore opportunities to include integrity/ethics more explicitly in recruitment processes, particularly at the application/assessment stages.* Whilst informal discussions around this have been held and it is supported in principle, it is accepted there are some detailed considerations that need to be made in relation to changes to processes and potentially systems. The Head of Strategic Development and HR Director will meet towards the end of September to formally assess the practicality of making such changes.

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 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 (May 2018 to present), the following audits have been completed:
 - i. Rapes / N100
 - ii. Other Sexual Offences
 - iii. Modern slavery
 - iv. PNDs and Cannabis Warnings
 - v. CAD to Crime Violence
 - vi. CAD to Crime Other
 - vii. Domestic Abuse
 - viii. Safeguarding Child
 - ix. Safeguarding Adults
14. 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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CITY OF LONDON POLICE

**INTEGRITY
DASHBOARD 2018/19
Quarter 1 **DRAFT**
Version 1.0**



NOT PROTECTIVELY MARKED

FORCE INTEGRITY INDICATORS										
Number	Indicator	Historic Levels				Current Levels 2018/19				
1	Number of Grievances registered with HR	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		7	7	13	8	2	-	-	-	2
	Two new grievances submitted in Quarter 1 (one relates to a communication matter and the other relates to fairness in treatment). No integrity issues identified.									
2	Number of Employment Tribunals that cite the Force	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		2	0	2	2	0	-	-	-	0
	No ETs submitted in Quarter 1.									
3	Number of registered complaints against Force excluding Action Fraud	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		117	105	102	90	11				11
	This is the number of complaints formally recorded under the Police Reform Act 2002, about the conduct of police officers and staff. The outcome of any recorded complaint following finalisation of the complaint is reported to the Professional Standards and Integrity Sub Committee on a quarterly basis, although the above figure does not reflect the number of cases finalised as they will fall into different periods depending on the length of the investigation. Additionally, any learning identified is reported through OLF. The number for the 1 st quarter is below the quarterly average.									
4	Number of Civil cases which site the Force	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		24	23	17	18	7				7
	This is the number of civil claims recorded for consideration by our insurers under professional indemnity or public liability. They may be recorded when there is the 'threat' of civil litigation, pre-action, or when the particulars of claim are received. A number of 'threat of' and pre-action matters are not necessarily progressed but may recorded and be kept open until limitation has been exceeded or confirmation that no claim will be made. A number of claims may be in parallel with or follow a complaint.									
5	Investigations resulting from monitoring of irregular mobile phone use	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0	1	0	0	0	0	0	0
	PSD assesses intelligence in respect of inappropriate usage and otherwise does not investigate use of mobile phones, telephone, and or iPad or other devices unless it is part of another investigation where inappropriate usage forms a strand of that investigation. The number is that that have been investigated.									
6	Number of monitoring exercises around irregular use/transitions involving Corporate credit cards	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		1	5	19	1	1				1
	PSD only assess intelligence received on the use of Corporate Cards. PSD does not otherwise investigate the use of Corporate Cards unless it is a recorded conduct investigation where inappropriate usage is, or forms a strand of, that investigation. The number provided is that that have been investigated. The outcome of any conduct investigation is reported to the Professional Standards and Integrity Sub Committee on a quarterly basis, although the above figure does not reflect the number of investigations completed as they will fall into different periods depending on the length of the investigation. Additionally, any learning identified is reported through OLF.									
7	Number of PSD investigations principally arising from complaints on use of Force	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		1	2	6	0	0	0	0	0	0

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	There have been no investigations conducted by PSD relating to complaints re the use of force.									
8	Number of monitoring assessments undertaken around expenses claims	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		1	2	1	3	0				0
PSD only assesses intelligence received on expense matters. Otherwise, PSD does not investigate expense claims unless it is, or forms part of, another recorded conduct investigation where inappropriate claims forms a strand of that investigation. The number is the number of investigations conducted.										
9	Number of business Interest Investigations undertaken for police officers	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		3	1	6	0	0				0
PSD risk assesses all new Business Interests and reviews annual renewals. Otherwise, PSD does not proactively assess or investigate business interest unless it is part of another investigation or vetting matter where the appropriateness of a business interest forms a strand of that investigation. The number provided is that that are investigated.										
FORCE INTEGRITY INDICATORS										
Number	Indicator	Historic Levels				Current Levels 2018/19				
10	Number of business Interest Investigations undertaken for support staff	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0	0	1	1				1
PSD risk assesses all new Business Interests and reviews annual renewals. Otherwise, PSD does not proactively assess or investigate business interest unless it is part of another investigation or vetting matter where the appropriateness of a business interest forms a strand of that investigation. The number provided is that that have been investigated. The outcome of any conduct investigation is reported to the Professional Standards and Integrity Sub Committee on a quarterly basis, although the above figure does not reflect the number of investigations completed as they will fall into different periods depending on the length of the investigation. Any learning identified is reported through OLF.										
11	Number of unregistered CoLP media contacts detected by Corp Comms and reported to PSD	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		2	0	5	1	0				0
PSD only assess media contacts where intelligence is received and only investigates where it is, or part of, a recorded conduct investigation where inappropriate contact is, or forms, a strand of that investigation. The number represents the number of investigations conducted.										
12	Number of investigations undertaken by PSD as a result of PNC/PND dip sampling	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		1	2	0	0	0				0
Unless referred to it by IMS PSD does not assess breaches of PNC/PND security, unless it has come to PSD's attention as a conduct matter in breach of the professional behaviour of confidentiality, and/or criminal misuse of computer systems, or has been referred from IMS, or it is part of a conduct investigation where inappropriate usage forms a strand of that investigation. The number represents the number of investigations.										
13	Number of monitoring exercises conducted on gifts and hospitality register entries	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		5	3	8	3	2	0	0	0	2
Gift and Hospitality is only assessed if intelligence is received about a specific recording or non-recording of a gift or hospitality. PSD does not otherwise investigate gift or hospitality matters unless it is a recordable conduct matter, where the giving or receiving of gifts and hospitality is, or forms a strand of, that investigation. The number represents the number of investigations where gifts and hospitality were a factor. The outcome of any conduct investigation										

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	is reported to the Professional Standards and Integrity Sub Committee on a quarterly basis, although the above figure does not reflect the number of investigations completed as they will fall into different periods depending on the length of the investigation. Any learning identified is reported through OLF.									
14	Number of management issues arising from re-vetting of the workforce	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
				0	0	0				0
	These are refusals that are considered in response to adverse information or intelligence during re-vetting on renewal or when upgrading of vetting for a specific role. The number represents the number of refusals.									
15	Number of procurement purchases assessed by PSD for investigation	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0	2	3	0	0	0	0	0
	PSD only assesses intelligence in respect of procurement matters, and otherwise does not investigate procurement unless it is either a complaint/conduct matter, or forms a strand of a complaint/conduct matter. The number represent the number of such matters investigated.									
16	Number of positive results from testing with cause random drug testing	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
				0	0	0	-	-	-	0
	No random drug tests undertaken in Quarter 1.									
17	Identified breaches of the Donations and sponsorship SOP	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
					-	0	-	-	-	-
	There have been no identified breaches of the SOP									

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POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2018-19 August 2018 update (DRAFT**)**



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

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

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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 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 23rd May 2018.</p> <p>The next meeting is on 27th September 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> <p>The list was checked and updated in August 2018.</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.</p> <p>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 (August 2018) exploring collaboration opportunities with the British Transport Police relating to counter corruption.</p>	

NOT PROTECTIVELY MARKED

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 public are also published on the public website (last published results 6-9th August 2018) (checked August 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 Force has participated in every panel held since it began in Decemner 2016, including hosting a number of the meetings. 2. The next meeting takes place on 12th September 2018 and is being hosted by CoLP. Commander Ops will be chairing one of the four panels. 	

NOT PROTECTIVELY MARKED

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>	

NOT PROTECTIVELY MARKED

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 is now a member of both the regional and national integrity boards.</p> <p>The next meetings are being held in Bath on 11th October 2018 (regional meetings) and 12th October (national meeting), both being chaired by the Chief Constable of Gwent Police.</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	RED
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 <p>Discussions have been ongoing (principally led by Ch.Supt I&I) for such a board to be agreed in principle. There are dissenting views around its necessity. Some feel it is duplicating work given that all Force report templates now include prompts around the ethical implications of proposals or decisions. If consensus is not achieved by the next reporting quarter, a proposal will be made to ISB for a formal decision.</p>	

NOT PROTECTIVELY MARKED

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	
<p>This plan and the broader Ethics agenda to be formally reviewed to inform developments for 2019. The review is not due until October 2018.</p>	

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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 /COMPLETE
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>	

NOT PROTECTIVELY MARKED

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>	

NOT PROTECTIVELY MARKED

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	RED
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> <p>Whilst initial discussions have taken place between the Head of Strategic Development and HR Director, diary commitments on both sides have prevented detailed proposals being worked up. A meeting has now been scheduled for late September 2018 to progress this.</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

NUT: National Union of Teachers

ATOC: (Association of Train Operating Companies) agreements.

To be authorised to travel within the ATOC agreement warranted officers must sign to join the scheme and an agreed amount is taken from their wages at source. When they begin working at CoLP officers are provided with a warrant card which previously permitted travel on the over ground trains within a specific region in the south east of the UK. As long as the warrant card did not have the words 'Not for Travel' across it officers were considered to be in the ATOC agreement. This has since changed and officers now receive a Rail Travel card to be

shown alongside their warrant card to confirm they are in the agreement.

Other forces have similar schemes including Essex Police who issues their officers in the agreement with a travel card. This has to be shown with a warrant card. With both CoLP and Essex Police when officers leave the force they are required to hand back both their warrant and travel cards. If they are transferring forces and required to travel by train the expectation would be that they would buy a train ticket on their first day before their new warrant card and now travel card are issued.