



Professional Standards and Integrity Sub (Police) Committee

Date: FRIDAY, 15 MARCH 2019

Time: 9.00 am

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

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

Enquiries: Alistair MacLellan / alistair.maclellan@cityoflondon.gov.uk

Future Meeting Dates (all at 11.00am)

3 June 2019, 9 September 2019, 29 November 2019.

**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. **GLOSSARY OF TERMS**

Report of the Commissioner.

For Information
(Pages 1 - 6)

4. **MINUTES**

To agree the public minutes and non-public summary of the meeting held on 7 December 2018.

For Decision
(Pages 7 - 12)

5. **PUBLIC OUTSTANDING REFERENCES**

Joint Report of the Town Clerk and Commissioner [TO FOLLOW].

For Information

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

Report of the Commissioner.

For Information
(Pages 13 - 18)

- a) Integrity Dashboard 2019/19 - Q3 (October 2018 to December 2018) (Pages 19 - 24)
- b) Police Integrity Development and Delivery Plan Report 2019-20 - March 2019 Update (Pages 25 - 42)

7. **EXCLUSION OF THE PUBLIC**

MOTION – that under Section 100A (4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business 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

8. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 7 December 2018.

For Decision
(Pages 43 - 46)

9. **NON-PUBLIC REFERENCES**
Joint report of the Town Clerk and Commissioner [TO FOLLOW].
For Information
- a) **3/2018/NP** (Pages 47 - 62)
To receive documents associated with Non-Public Reference 3/2018/NP.
10. **EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES**
Report of the Comptroller and City Solicitor.
For Information
(Pages 63 - 72)
11. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 3 (1 OCTOBER 2018 – 31 DECEMBER 2018)**
Report of the Commissioner.
For Information
(Pages 73 - 100)
12. **SUMMARY OF CASES**
Report of the Commissioner.
For Information
(Pages 101 - 106)
13. **MISCONDUCT HEARING**
Report of the Commissioner.
For Information
(Pages 107 - 108)
14. **CONDUCT AND COMPLAINT CASES - CASE TO ANSWER / UPHELD**
Report of the Commissioner.
For Information
(Pages 109 - 114)
15. **CONDUCT AND COMPLAINT CASES - NO CASE TO ANSWER / NOT UPHELD**
Report of the Commissioner.
For Information
(Pages 115 - 132)
16. **COMPLAINT CASES - LOCAL RESOLUTION**
Report of the Commissioner.
For Information
(Pages 133 - 156)

17. **IOPC POLICE COMPLAINTS BULLETIN (1 APRIL 2018 - 31 DECEMBER 2018)**
Report of the Commissioner.

For Information
(Pages 157 - 170)

NOT PROTECTIVELY MARKED

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

CCJ: County Court Judgement

HCP: Health Care Professionals

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.

PROFESSIONAL STANDARDS AND INTEGRITY SUB (POLICE) COMMITTEE

Friday, 7 December 2018

Minutes of the meeting of the Professional Standards and Integrity Sub (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Friday, 7 December 2018 at 1.45 pm

Present

Members:

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

Officers:

Simon Latham	- Head of Town Clerk & Chief Executive's Office
Oliver Bolton	- Town Clerk's Department
Alistair MacLellan	- Town Clerk's Department
Alistair Sutherland	- Assistant Commissioner, City of London Police
Maria Woodall	- City of London Police
Karen Baxter	- City of London Police
Stuart Phoenix	- City of London Police

1. APOLOGIES

Apologies were received from Doug Barrow, Tijs Broeke, Mia Campbell, Deputy Richard Regan and James Tumbridge.

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

There were no declarations.

3. MINUTES

RESOLVED, that the public minutes and non-public summary of the meeting held on 17 September 2018 be approved as a correct record.

4. PUBLIC OUTSTANDING REFERENCES

Members considered a report of the Town Clerk regarding public outstanding references and the following points were made.

Reference 1 – Measures Due Dates

- The Chairman noted that this reference remained outstanding and that the due date should be amended to March 2019.

Reference 2 – Staff Survey Action Plan

- The Chairman noted that a report regarding this reference was on the agenda and therefore this reference could be closed.

Reference 3 – Community Scrutiny Group (CSG), Independent Advisory Group (IAG) Meeting Dates

- The Commissioner of Police noted that advertisements for new Members would be made in early 2019.
- In response to comments from Members over the length of time served by some Members of the CSG and IAG, and questions over to what extent the Police Committee could involve itself in the governance of those groups, the Commissioner agreed to include the CSG and IAG in the ongoing piece of governance work on City of London Police, and to consult with Nick Bensted-Smith and Tijs Broeke as appropriate **(Reference 1/2018/P)**.
- The Chairman noted that, subject to the reference to governance being captured, the reference regarding meeting dates could be closed.

Reference 4 – London Police Challenge Forum

- The Chairman requested that the outcomes for the forum be circulated when available and that Members be kept informed of future meeting dates **(Reference 2/2018/P)**. Subject to those requests being addressed, the reference could be closed.

Reference 6 – Professional Standards Newsletter

- The Chairman noted that this reference could be closed.

Reference 7 – Staff Survey Indicators on Dashboard

- Members noted that this reference was outstanding.

RESOLVED, that the report be received.

5. STAFF SURVEY RESPONSE

Members considered a report of the Commissioner of Police regarding responses to the Staff Survey and the following points were made.

- The Commissioner of Police noted that responses to the staff survey had been generally positive and that workshops had been convened to review common areas of feedback that had arisen from the survey.
- The Chairman noted that the report was the culmination of 12 months of work and welcomed the provision of an action plan.

- In response to a question from a Member, the Commissioner of Police confirmed that top-down results were shared with wider Police officers and staff. The Chairman noted that clear feedback was necessary to ensure survey respondents were given confidence in the survey process.
- Members noted that they would welcome an element of tracking of measures that had been implemented as a result of the survey.
- The Chairman suggested that the City Police should consider a further staff survey from November 2019, and that the Action Plan should be reported to the Sub-Committee at its March 2019 meeting (**Reference 3/2018/P**).

RESOLVED, that the report be received.

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

Members considered a report of the Commissioner of Police regarding the Integrity Dashboard and a Code of Ethics Update and the following points were made.

Integrity Dashboard

- The Commissioner of Police noted that two workshops had been convened to review the Integrity Dashboard.

Code of Ethics Update

- The Chairman requested that some examples of videos of Chief Officers talking about difficult decisions that they had faced be provided at the Sub-Committee's next meeting in March 2019 (**Reference 4/2018/P**).
- In response to a request from the Chairman, the Commissioner of Police agreed to review appropriate use of language in integrity and ethics reporting to improve clarity i.e. making clear whether zero drug tests referred to zero drug tests being undertaken, or zero positive drug tests having been recorded.
- In response to a question from a Member, the Commissioner of Police replied that the revised Integrity Standards Development Plan would be ready in early 2019.
- In response to a question from a Member, the Commissioner of Police confirmed that the use of a spit & bite guard would be recorded as a use of force.
- The Chairman requested that a report how spit & bite guards had been used be provided to the Sub-Committee at its meeting in June 2019 (**Reference 5/2018/P**).

RESOLVED, that the report be received.

7. IOPC POLICE COMPLAINTS: STATISTICS FOR ENGLAND AND WALES 2017/18

Members considered the IOPC Statistics for England and Wales 2017/18 and noted that the City of London Police was at the lower end of statistical reporting.

RESOLVED, that the report be received.

7.1 Questions

There were no questions.

7.2 Any Other Business

Spit & Bite Guards

Members considered a tabled report of the Commissioner of Police regarding spit & bite guards that had been submitted to the Police Committee at its meeting on 5 December 2018.

RESOLVED, that the report be received.

8. EXCLUSION OF THE PUBLIC

RESOLVED, that under Section 100A (4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

9. NON-PUBLIC MINUTES

RESOLVED, that the non-public minutes of the meeting held on 17 September 2018 be approved as a correct record.

10. NON-PUBLIC REFERENCES

Members considered a report of the Town Clerk regarding non-public outstanding references.

11. NON-PUBLIC APPENDIX - STAFF SURVEY REPORT

Members considered a non-public appendix to the public report of the Commissioner of Police regarding the staff survey.

12. PROFESSIONAL STANDARDS STATISTICS - QUARTER 2

Members considered a report of the Commissioner of Police regarding Professional Standards Statistics for Quarter 2.

13. CASE SUMMARY

Members considered a Case Summary report of the Commissioner of Police.

13.1 Case to Answer - Upheld

Members considered an appendix regarding Cases to Answer that had been upheld.

13.2 No Case to Answer - Not Upheld

Members considered an appendix regarding No Cases to Answer that had not been upheld.

13.3 Local Resolution

Members considered an appendix regarding cases that had been dealt with via local resolution.

14. COMPLAINTS BULLETIN - QUARTER 2

Members considered a report of the Commissioner of Police regarding the Complaints Bulletin for Quarter 2.

15. GLOSSARY

Members considered a Glossary provided by the Commissioner of Police.

16. NON-PUBLIC QUESTIONS

There were no questions.

17. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND THE SUB-COMMITTEE AGREES SHOULD BE CONSIDERED WHEN THE PUBLIC ARE EXCLUDED

There were three items of other business.

The meeting ended at 3.03 pm

Chairman

Contact Officer: Alistair MacLellan / alistair.maclellan@cityoflondon.gov.uk

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Committee(s): Professional Standards and Integrity Sub Committee	Date: 15 th March 2019
Subject: Integrity Dashboard and Code of Ethics Update	Public
Report of: Commissioner of the City of London Police	For Information
Report author: Head of Strategic Development	

Summary

Integrity Standards Board and Dashboard:

The dashboard appended to this report (Appendix A) was considered by the Force's Integrity Standards Board (ISB) on 1st March 2019. Indicator 4, the number of civil cases which cite the Force' was considered in some depth due to the 22 cases this year compared to 18 for the whole of 2018/19 although no issue relating to integrity were highlighted.

All the remaining indicators were discussed; no underlying concerns around integrity were noted by the ISB. While it was accepted that there had been a quarterly rise in complaints against police officers, no integrity issues were identified and the level of complaints remains lower than historic levels; 38 for the year to date compared with 90 for 2017/18.

ISB were provided with a draft revised Integrity Dashboard containing a wider suite of indicators compared to the current dashboard. Feedback on the draft was provided by members and work was tasked to develop the content for formal approval at the next ISB. The Force undertook to circulate an updated version to members of your Sub Committee for review after this work had been completed so that additional input can be captured before final approval at ISB.

Code of Ethics Update:

A London Police Challenge Forum (LCPF) event took place on 13th December 2018 at New Scotland Yard. The City of London police's contribution was a collection of 3 short videos from the Commissioner, Commander Ops and Commander ECD about difficult decisions they have taken that have a distinct ethical dimension.

Dates have been set for LCPF events throughout 2019, with CoLP hosting meetings on 13th May, 13th September and 5th December 2019.

The Head of Strategic Development (HoSD) attended the most recent regional meeting of the Police Ethics Network (PEN) on 8th January 2019 hosted by Bath Spa University, followed by the UK Police Ethics Guidance Group on the 15th January 2019. A key area discussed at both meetings related to significant ethical

considerations arising from the expansion of digital investigation and the use of certain technologies in policing.

The reviewed Integrity Standards Development Plan is also included for information. By the end of 2018, all provisions had been delivered with the exception of one area relating to a proposal to set up an internal board to review/advise on key decisions. As no determination has been made, it has been re-included in the revised development plan.

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 an Integrity Development plan, which is attached for Members' information at Appendix B.

Current Position

Integrity Standards Board and Dashboard

3. The 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. The most recent board was held on 1st March 2019.
4. The Integrity Dashboard was reviewed as part of the discussions within ISB. Upon provision of the data no integrity issues had been highlighted for the board to note from information providers. Strategic Development drew attention to Indicator 4, 'Number of Civil cases which cite the Force', which has risen to 22 for this year compared to 18 for the whole of 2018/19 although no issues around integrity have been highlighted. ISB noted this position however should figures continue to show an upward trend.
5. All the remaining indicators were discussed to ensure there were no issues for the board to note. While it was accepted that there had been a quarterly rise in complaints against police officers, it was again the case that no integrity issues were identified and the level of complaints remains lower than historic levels; 38 for the year to date compared with 90 for 2017/18.

6. A reviewed Integrity Dashboard was considered by the ISB. The indicators were discussed in detail and a number of suggestions were made to develop the document going forward. Strategic Development have been tasked with making the amendments provided so that the board can formally agree the new version for use at their next meeting and the new indicators will report from 1st Quarter 2019/20. The Force undertook to circulate the revised dashboard to members of your Sub Committee for review after this work had been completed so that additional input could be captured before final approval at ISB.

Code of Ethics Update

7. Since your last Sub Committee there has been one London Police Challenge Forum (LPCF) event, hosted by the Metropolitan Police Service at New Scotland Yard on the 13th December 2018. The event was opened by DAC Richard Martin. It followed a different format to the usual LPCFs and included a presentation from a former employee of a large construction company, who spoke about the integrity-related warning signs that prefaced the organisation going into liquidation (principally a convoluted governance structure and organisational deafness to issues being escalated, including via their staff survey). There were also presentations from Devon and Cornwall Police summarising their achievements in the police integrity-related arena, and representatives from British Transport Police, talking about their values-based training.
8. The City of London Police's contribution to the event was a collection of three videos, from the Commissioner, Commander Ops and Commander ECD, talking about how they approached difficult, ethical issues during their careers. The videos were shown in sections to give those present an opportunity to discuss what issues they felt were raised by the scenarios, and how they might approach them in the same position, before going on to find out what action the chief officers actually took. The videos were very well received and have since been shared with another regional group, who intend to ask their chief officers to undertake a similar exercise.
9. The scheduled LPCF events for 2019 are:
 - a. 4th March 2019 hosted by BTP and MPS (to be observed by the Civil Nuclear Constabulary)
 - b. 13th May 2019 **hosted by CoLP**
 - c. 17th May 2019 hosted by MPS/NCTPHQ
 - d. 10th June 2019 hosted by MPS/NCTPHQ
 - e. 19th June 2019 hosted by BTP
 - f. 9th September 2019 hosted by MPS/NCTPHQ
 - g. 13th September 2019 **hosted by CoLP**
 - h. 16th October 2019 hosted MPS/NCTPHQ
 - i. 17th October 2019 hosted by BTP
 - j. 5th December 2019 **hosted by CoLP**
 - k. 6th December 2019 hosted by MPS/NCTPHQ

10. Members are reminded that they are welcome to observe any panel.
11. The Force is hosting an extra LPCF event on 20th March 2019 aimed at members of staff associations and the role those associations can play in promoting ethical policing. Representatives from all support networks across the LPCF forces have been invited.

Regional Police Ethics Network and UK Police Ethics Guidance Group

12. The Head of Strategic Development attended the most recent meeting of the Regional Police Ethics Network (RPEN) hosted by Bath Spa University on 8th January 2019. The regional group is becoming more diverse, with representatives from the Royal Navy and Royal Marines now attending, together with academics with an interest in ethics and policing. Of particular interest were the following two items:
 - a. A toolkit that has been produced to help decision makers decide whether to investigate cases of historical sexual abuse where offences are disclosed from reviewing third party documents but no crimes have been reported. The toolkit, which is being piloted by a small number of forces, takes decision makers through a process, which if followed, demonstrates auditable decisions based on duty of care and risk and is held out to withstand judicial review.
 - b. Emerging academic thinking about the ethical implications arising from the 'digital and data' world and its burgeoning importance to digital investigation in policing. The LPCF undertook to organise an event in London to explore the issues in more depth, although at the time this report was prepared, no firm date had been set.
13. The afternoon session of the RPEN was dedicated to reviewing ethical dilemmas that have already been discussed by forces in the region, effectively validating the findings of previous panels.
14. The UK Police Ethics Guidance Group (UKPEGG) met the following week on 15th January 2019, also at Bath Spa University and was chaired by NPCC Lead for the Police Code of Ethics - Chief Constable Julian Williams (Gwent Police). Items discussed included:
 - a. Formation of a 'Digital Ethics Panel' looking specifically at online investigation tactics, use of undercover online officers, use of predictive programmes, the huge amount of information held on databases and how forces are using technology (e.g. Durham Police's use of an app that advises on risk relating to granting an individual bail). This item links to the proposed event being planned by the LPCF referred to at 12(b) ante.
 - b. A proposed Appropriate Relationships at Work Policy is currently with the College of Policing for consideration and sign off.

- c. A presentation from a force who are looking to make representations to the Home Office to change 'outcome 21' of the National Crime Recording Standard specifically in relation to young people who engage in consensual activities but who are nonetheless committing an offence. Such individuals stand to be classified as sex offenders, which can, for example, debar them from entering countries such as the United States, where non-US citizens are asked to declare if they have ever been investigated for a sexual offence.
- d. It was confirmed that the action to develop a suitable online database remains a work in progress and rests with the Chair of the UKPEGG.

Integrity Standards Development Plan

- 15. The Integrity Standards Development Plan has been reviewed. It remains in two sections covering 'commitment' actions and 'development' actions. The commitment section, which is unchanged is intended to ensure that the Force maintains the basic structures to support integrity in the workplace. As long as these are being maintained they will be reflected as 'GREEN'.
- 16. The development section contains those areas that the Force will introduce or explore over 2019/20.
- 17. At the end of the year, the Force had delivered all of the plan, with the exception of one area, relating to a consideration of an internal board to advise on and review key decisions. There were two opposing points of view:
 - a. That there are sufficient mechanisms in place to ensure decisions are made taking into consideration the police code of ethics, rendering a board superfluous; and
 - b. A separate board is necessary to demonstrate challenge and transparency around decision making.
- 18. A determination was requested from the last ISB, however, an action was allocated to Organisational Development (OD) to include consideration of this point in its review of leadership measures within the Force. The matter is being retained on the development plan therefore, pending a recommendation being made by OD.

Crime audits

- 19. 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.

20. 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.

21. At the 1st March meeting, the FCIR briefed those present on the results of an audit on crime outcomes, and an update of the ongoing Crime Data Integrity inspection, which is due to be completed by the first week in April.

Appendices

- Appendix A – Integrity Dashboard (considered by the Integrity Standards Board 1st March 2019)
Appendix B – Integrity Standards Development Plan (considered by the Integrity Standards Board 1st March 2019)

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CITY OF LONDON POLICE

**INTEGRITY
DASHBOARD 2018/19
Quarter 3 (Oct to Dec 2018)
Version 1.0**



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	4	-	8
	Four new grievances submitted in Quarter 3. No integrity issues have been identified for reporting to ISB through the HR return to Strategic Development. Three of the grievances related to individuals displeased about perceived treatment by managers following management action. The other related to an individual displeased about the application of a policy.									
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	1	0	-	1
	No ET has been submitted in Quarter 3.									
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	12	15	-	38
	<p>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 Organisational Learning Forum.</p> <p>The number of complaints remains at a steady level from that reported in quarter 2. Complaints involve one or more allegations against officers, the broad range of allegations are reported to our Professional Standards Sub-Committee who receive an update on how the investigations are progressing. Integrity issues found as a result of these investigations will be raised at future ISBs and Organisational Learning Forum for action.</p>									
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	4	11	-	22
	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
	<p>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.</p> <p>For the third quarter there are no investigations to report in this area.</p>									

FORCE INTEGRITY INDICATORS										
Number	Indicator	Historic Levels				Current Levels 2018/19				
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	2	1	-	4
	<p>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 Organisational Learning Forum.</p> <p>PSD have not identified any Integrity issues with these investigations for inclusion within this analysis and reporting to ISB in their return to Strategic Development.</p>									
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
	<p>Use of Force Forms now being recorded via Pronto - They are not being used for the purposes of integrity monitoring by Counter Corruption Unit.</p> <p>For the third quarter there are no investigations to report in this area.</p>									
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	0	-	0
	<p>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.</p>									
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	0	-	0
	<p>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(s) provided are those that are investigated.</p> <p>For the third quarter there are no investigations to report in this area.</p>									

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	0	2	-	3
	<p>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 Organisational Learning Forum.</p> <p>For the third quarter there are 2 investigations to report in this area.</p>									
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	0	-	0
	<p>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.</p> <p>Corporate Communications have not identified any unregistered contacts within this period to report.</p>									
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	0	-	0
	<p>Unless referred to it by Information Management Services (IMS), PSD does not assess breaches of Police National Computer/Police National Database 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.</p> <p>There has been no intelligence submitted to PSD that has resulted in any investigations in this area.</p>									
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	-	2
	<p>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 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 Organisational Learning Forum.</p>									

FORCE INTEGRITY INDICATORS										
Number	Indicator	Historic Levels				Current Levels 2018/19				
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	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. There are no integrity issues to report in this area for the third quarter.									
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	1	0	-	1
	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. PSD have not identified any Integrity issues for inclusion within this analysis from their investigation carried out in this quarter in their return to Strategic Development.									
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	0	-	0
	10 drug tests were completed with 0 positive results in Quarter 3.									
17	Identified breaches of the Donations and sponsorship Standard Operating Procedure (SOP)	2014/15	2015/16	2016/17	2017/18	QTR 1	QTR 2	QTR 3	QTR 4	Total
					-	0	0	0	-	0
	There have been no identified breaches of the SOP within this period as reported by Finance to Strategic Development to inform the Dashboard for this reporting period.									

The data submitted by Human Resources and Professional Standards has been cross referenced with the submissions provided to Organisational Learning Forum. No integrity issues were reported at OLF and this is reflected within this Dashboard return with regards to Grievances and Employment Tribunals as well as PSD investigations.

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POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2019-20 March 2019 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 (then) 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			
	Mar 19			
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 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes	GREEN			
1.6 Maintain a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates)	GREEN			
1.7 Maintain a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan	GREEN			
1.8 Ensure training on standards, values and leadership ethics is available for all staff	GREEN			
1.9 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures	GREEN			

2. Development Measures	Traffic Light Tracker			
	Mar 19			
2.1 Consider with HR/OD taking part in the long term 'ethical drift' survey	WHITE			
2.2 Consider 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 Arrange an independent peer review of organisational integrity arrangements	WHITE			
2.5 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assessment report when published.	WHITE			

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 2019
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 will also be 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 2019
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 2019.</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 2019
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 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 December 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 have SPOCs.</p> <p>At February 2019 the Directorate SPOCs are as follows:</p> <p>Crime – D Service</p> <p>I&I – H McKoy</p> <p>Uniform Policing – E Michaels</p> <p>Economic Crime – G Whittick</p> <p>BSD – P Adams</p> <p>.</p>	

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1. COMMITMENT CRITERIA	
MEASURE	1.5 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 2019
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	
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 21 st January 2019) (checked February 2019)	

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1. COMMITMENT CRITERIA	
MEASURE	1.6 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 December 2016, including hosting a number of the meetings. 2. The next meeting is 4th March 2019. CoLP is hosting meetings in May, September and December 2019. 	

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1. COMMITMENT CRITERIA	
MEASURE	1.7 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	1.8 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. (Position remains accurate @ February 2019).</p>	

NOT PROTECTIVELY MARKED

1. COMMITMENT CRITERIA	
MEASURE	1.9 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 February 2019).</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 Consider with Human Resources/Organisational Development taking part in the long term 'ethical drift' survey
OWNER	Head of Strategic Development / HR/ OD
AIM/RATIONALE	To inform Force development. The survey seeks to assess levels of ethical decline over an officer's career. This will inform long term planning around activities that can be put in place to mitigate any decline.
MEASUREMENT	Head of Strategic Development to provide ISB with details of activities supporting this indicator
DUE BY	July 2019
TRAFFIC LIGHT CRITERIA	Green: participation agreed and rolled out Amber: Activity in train (within due time) but not delivered. Red: No activity and past due date
TRAFFIC LIGHT	WHITE
CURRENT POSITION	

NOT PROTECTIVELY MARKED

2. Development Measures	
MEASURE	2.2 Consider an internal board to advise on and review key decisions and processes
OWNER	Head of Organisational Development
AIM/RATIONALE	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 2019
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	
The ISB held in December 2018 allocated this as an action to the Head of Organisational Development to consider as part of the Leadership review.	

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 2019
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	

NOT PROTECTIVELY MARKED

2 Development Measures	
MEASURE	2.4 Arrange an independent peer review of organisational integrity arrangements
OWNER	Head of Strategic Development
AIM/RATIONALE	To assess the extent to which integrity related arrangements in force are sufficient and embedded, and inform development of this plan
MEASUREMENT	Review complete and action plan amended
DUE BY	September 2019
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	WHITE
CURRENT POSITION	

NOT PROTECTIVELY MARKED

2 Development Measures	
MEASURE	2.5 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assesment report when published
OWNER	Head of Strategic Development (and any other relevant individual identified by the report)
AIM/RATIONALE	To ensure the Force actions best practice identified by HMICFRS.
MEASUREMENT	Progress reported to Performance Management Group and ISB
DUE BY	TBC following publication of the report (anticipated late Spring 2019)
TRAFFIC LIGHT CRITERIA	Green: AFI delivered; Amber: Action in progress to deliver AFI but not fully delivered; Red: AFI not delivered by due date
TRAFFIC LIGHT	WHITE
CURRENT POSITION	

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