



Professional Standards and Integrity Committee of the Police Authority Board

Date: MONDAY, 3 JUNE 2019

Time: 11.00 am

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

Members: Alderman Alison Gowman (Chair)
Douglas Barrow (Ex-Officio Member)
Nicholas Bensted-Smith
Tijs Broeke
Mia Campbell (External Member)
Alderman Emma Edhem
Deborah Oliver
Deputy James Thomson (Ex-Officio Member)
Co-Opted Member
Co-Opted Member

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

Lunch will be served in the Guildhall Club at 1pm

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

**John Barradell
Town Clerk and Chief Executive**

AGENDA

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **TERMS OF REFERENCE**
To receive the terms of reference of the Committee as approved by the Police Authority Board at its meeting on 16 May 2019.

For Information
(Pages 1 - 2)
4. **APPOINTMENT OF CO-OPTED MEMBERS**
The Chair to be heard.

For Decision
5. **MINUTES**
To agree the public minutes and non-public summary of the meeting held on 15 March 2019.

For Decision
(Pages 3 - 8)
6. **OUTSTANDING REFERENCES**
Report of the Town Clerk.

For Information
(Pages 9 - 10)
7. **INTRODUCTION OF SPIT AND BITE GUARDS**
Report of the Commissioner.

For Information
(Pages 11 - 14)
8. **HMICFRS INTEGRATED PEEL ASSESSMENT 2018-19**
Report of the Commissioner.

For Information
(Pages 15 - 18)
9. **INTEGRITY DASHBOARD AND CODE OF ETHICS UPDATE**
Report of the Commissioner.

For Information
(Pages 19 - 32)

10. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
11. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
12. **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 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.

For Decision
13. **NON-PUBLIC MINUTES**
To agree the non-public minutes of the meeting held on 15 March 2019.

For Decision
(Pages 33 - 38)
14. **NON-PUBLIC OUTSTANDING REFERENCES**
Report of the Town Clerk.

For Information
(Pages 39 - 44)
15. **11/2019/NP - FORCE RESPONSE TO HMICFRS COMPLAINTS AND MISCONDUCT FILE REVIEW**
To consider the Force Response to HMICFRS Complaints and Misconduct File Review.

For Information
(Pages 45 - 48)
16. **IOPC POLICE COMPLAINTS INFORMATION BULLETIN - CITY OF LONDON - APRIL 2018 - MARCH 2019**

For Information
(Pages 49 - 62)
17. **EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES**
Report of the Comptroller & City Solicitor.

For Information
(Pages 63 - 72)
18. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 4 – 1 JANUARY 2019 – 31 MARCH 2019**
Report of the Commissioner.

For Information
(Pages 73 - 98)

19. **SUMMARY OF CASES**

For Information
(Pages 99 - 102)

- a) Misconduct - Gross Misconduct (Pages 103 - 110)
- b) Case to Answer (Pages 111 - 112)
- c) No Case to Answer (Pages 113 - 132)
- d) Local Resolution (Pages 133 - 136)

20. **GLOSSARY**

For Information
(Pages 137 - 142)

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

22. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

Professional Standards and Integrity Committee of the Police Authority Board

Composition

- The Chairman and Deputy Chairman of the Police Authority Board (ex-officio)
- Up to five Members of the Police Authority Board appointed by the Police Authority Board
- Up to two co-opted Common Council Members to be appointed by the Professional Standards and Integrity Committee
- One external co-opted Member to be appointed by the Professional Standards and Integrity Committee.

Terms of Reference

To be responsible for:

- a. overseeing the handling of complaints and the maintenance of standards across the force, where necessary recommending changes in procedures and performance to the Police Authority Board;*
- b. monitoring the Police Authority Board's work in respect of conduct and appeals proceedings; and,*
- c. monitoring government, police authorities and other external agencies' policies and actions relating to professional standards and advising the Police Authority Board or Commissioner as appropriate.*
- d. overseeing the work of the City of London Police Integrity Standards Board, whose purpose is to direct and co-ordinate the auditing of the key indicators in relation to the City of London Police Integrity Dashboard, delivery of associated action plans and promoting the understanding of the Police Code of Ethics.*

Frequency of Meetings

Quarterly

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PROFESSIONAL STANDARDS AND INTEGRITY SUB (POLICE) COMMITTEE Friday, 15 March 2019

Minutes of the meeting of the Professional Standards and Integrity Sub (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Friday, 15 March 2019 at 9.00 am

Present

Members:

Alderman Alison Gowman (Chair)
Nicholas Bensted-Smith
Mia Campbell (External Member)
Deborah Oliver (External Member)
Deputy James Thomson (Ex-Officio Member)
James Tumbridge

City of London Police Authority:

Oliver Bolton	- Town Clerk's Department
Alistair MacLellan	- Town Clerk's Department
Tarjinder Phull	- Comptroller & City Solicitor's Department

City of London Police

Alistair Sutherland	- Assistant Commissioner
Maria Woodall	- Detective Chief Superintendent (Crime)
Stuart Phoenix	- Head of Strategic Development

1. APOLOGIES

Apologies were received from Douglas Barrow, Tijs Broeke and Deputy Richard Regan.

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

Deborah Oliver declared a non-pecuniary interest in Item 10 (Employment Tribunal and Other Cases), noting that her employer the British Medical Association operated a similar scheme to that referred to within the report accompanying that agenda item.

3. GLOSSARY OF TERMS

RESOLVED, that the glossary of terms be received.

4. MINUTES

RESOLVED, that the public minutes and non-public summary of the meeting held on 7 December 2018 be approved as a correct record.

5. **PUBLIC OUTSTANDING REFERENCES**

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

1 – Measures Due Dates

- The Commissioner noted that further review of due dates was required to bring them up to date.

7 – Staff Survey Indicators

- The Commissioner noted that the Staff Survey Action Plan was now ready and could be circulated to Members outside of the meeting.

1/2018/P – Community Scrutiny Group and Independent Advisory Group

- Members noted that this reference was being addressed by the Police Committee and could therefore be closed.

2/2018/P – London Police Challenge Forum Outcomes and Future Dates

- The Commissioner noted that it was clear from recent meetings of the Forum that a greater triangulation of data between partner organisations was required. In response to a question, the Commissioner confirmed that, in his view, attendees of the Forum were providing an adequate level of scrutiny and challenge.
- In response to a request from the Chair, the Commissioner agreed to invite Members to the next meeting of the Forum on 13 May 2019.

3/2018/P – Further Staff Survey and Staff Survey Action Plan

- In response to a request from the Chair, the Commissioner agreed to confirm when the next staff survey would be conducted, and to include the Staff Survey Action Plan as an agenda plan at a future meeting.

4/2018/P – Example Videos

- In response to a request from a Chair, the Commissioner agreed to make example videos available to Members on request, and to provide projection facilities to display the videos at a future meeting.

5/2018/P – Spit & Bite Guards

- The Chair noted that a report on Spit & Bite Guards would be submitted to the June 2019 meeting.

3/2019/P – Glossary of Terms

- In response to a request, the Commissioner agreed to ensure the glossary of terms was provided in alphabetical order and would be attached at the end of papers presented to the Sub-Committee.

RESOLVED, that the report be received.

6. INTEGRITY DASHBOARD AND CODE OF ETHICS UPDATE

Members considered an update report of the Commissioner regarding the Integrity Dashboard and Code of Ethics.

RESOLVED, that the report be received.

6.1 Integrity Dashboard 2019/19 - Q3 (October 2018 to December 2018)

Members considered the Integrity Dashboard for Quarter 3 (October 2018-December 2018) and the following points were made.

Civil Cases that cite the Force

- The Chair welcomed the figures outlined within the dashboard, noting that only the number of Civil cases which cited the Force (11 as at Q3) demonstrated a trend that risked matching or exceeding cases recorded in previous years.
- The Commissioner noted that a revised dashboard had been developed and would be circulated to Members for comment outside of the meeting.

Number of Professional Standards Directorate investigations principally arising from complaints on use of force

- In response to a question, the Commissioner noted that the drop-off in investigations was due to the implementation of learning and development solutions for the identified issue (i.e. six cases in 2016/17).

Number of business interest investigations undertaken for police officers

- In response to a question, the Commissioner replied that an improved system for reporting business interests had reduced the number of instances where a business interest investigation was necessary.
- The Chair reminded Members that the Sub-Committee had the ability to 'deep dive' on any Professional Standards and Integrity issue it chose to.

RESOLVED, that the Integrity Dashboard be received.

6.2 Police Integrity Development and Delivery Plan Report 2019-20 - March 2019 Update

Members considered the Police Integrity Development and Delivery Plan report 2019/20 (March 2019 Update) and the following points were made.

- In response to a comment from a Member, the Commissioner noted that he could condense Commitment criteria onto a single side of A4.

RESOLVED, that the Police Integrity Development and Delivery Plan report 2019/20 (March 2019 Update) be received.

Members confirmed they had no questions or any other business. The Town Clerk noted that the agenda template would be updated to include these standing items going forward.

7. 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 that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

8. NON-PUBLIC MINUTES

RESOLVED, that the non-public minutes of the meeting held on 7 December 2018 be approved as a correct record.

9. NON-PUBLIC REFERENCES

Members considered a tabled joint report of the Town Clerk and Commissioner.

9.1 3/2018/NP - Social Media Standard Operating Procedure

Members considered the City of London Police Social Media Standard Operating Procedure and Code of Practice for Twitter account authors.

10. EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES

Members considered a report of the Comptroller and City Solicitor regarding an Employment Tribunal and other cases.

11. PROFESSIONAL STANDARDS STATISTICS – QUARTER 3 (1 OCTOBER 2018 – 31 DECEMBER 2018)

Members considered a report of the Commissioner regarding Professional Standards Statistics for Quarter 3 (1 October 2018 – 31 December 2018).

12. SUMMARY OF CASES

Members considered a summary of cases provided by the Commissioner.

13. MISCONDUCT HEARING

Members considered a report of the Commissioner regarding a Misconduct Hearing.

14. **CONDUCT AND COMPLAINT CASES - CASE TO ANSWER / UPHELD**
Members considered a report of the Commissioner regarding Conduct and Complaint Cases – Case to answer / upheld.
15. **CONDUCT AND COMPLAINT CASES - NO CASE TO ANSWER / NOT UPHELD**
Members considered a report of the Commissioner regarding Conduct and Complaint Cases – No Case to Answer / Not Upheld.
16. **COMPLAINT CASES - LOCAL RESOLUTION**
Members considered a report of the Commissioner regarding Complaint Cases – Local Resolution.
17. **IOPC POLICE COMPLAINTS BULLETIN (1 APRIL 2018 - 31 DECEMBER 2018)**
Members considered the IOPC Police Complaints Bulletin for 1 April 2018 – 31 December 2018.

The meeting ended at 10.43 am

Chair

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PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE – PUBLIC OUTSTANDING REFERENCES

Reference Number	Meeting Date + Reference	Action	Owner	Status
1	27 September 2019 Item 5 – Integrity Dashboard Measures Due Dates	Measures Due Dates to be reviewed and updated – some are listed as March 2018	Stuart Phoenix	Completed
7	5 June 2017 Item 12 - Integrity Dashboard Staff Survey Indications on Dashboard	Action Plan to be circulated to Sub-Committee [NB further action at 3/2018/P]	Alistair MacLellan / Stuart Phoenix	Completed
1/2018/P	7 December 2018 Item 4 – References CSG and IAG to be included in governance review	Reference to be closed and dealt with by Police Committee	Alistair MacLellan	Completed
2/2018/P	7 December 2018 Item 4 – References London Police Challenge Forum Outcome and Dates	Outcomes of meetings to be circulated, and Members to be invited to future meetings (next meeting 13 May)	Stuart Phoenix	Completed
3/2018/P	7 December 2018 Item 5 - Staff Survey Response Further Staff Survey and Staff Survey Action Plan	Force to confirm when next Staff Survey will be conducted, and Action Plan to be considered at future meeting.	Alistair Sutherland	Update at June 2019 meeting

4/2018/P	7 December 2018 Item 6 – Integrity Dashboard Example Videos	Videos to be projected at June 2019 meeting, and made available to Members outside of meeting(s) on request.	Stuart Phoenix / Alistair MacLellan	Completed
5/2018/P	7 December 2018 Item 6 – Integrity Dashboard Spit & Bite Guards	Report on use of spit & bite guards to be submitted to June 2019 meeting.	Glenn Maleary	Completed
1/2019/P	15 March 2019 Item 6 – Integrity Dashboard Dashboard Format	Revised Dashboard to be circulated to Members outside of the meeting	Stuart Phoenix	<i>To be completed ahead of June 2019 meeting</i>
2/2019/P	15 March 2019 Item 6 – Integrity Dashboard Commitment Criteria	Condense Commit Criteria into single page	Stuart Phoenix	Completed
3/2019/P	15 March 2019 Item 3 – Glossary of Terms Alphabetical Order	Glossary of terms to accompany Complaint reports and to be in alphabetical order	Maria Woodall	Completed

Agenda Item 7

Committee(s): Professional Standards and Integrity Sub Committee	Date(s): 3 rd June 2019
Subject: Introduction of Spit and Bite Guards	Public
Report of: Commissioner of Police Pol 43-19	For Information
Report author: Chief Inspector Rob Wright, Specialist Support, Uniformed Policing	

Summary

In November 2018, the Force's Strategic Management Board (SMB) was presented with proposals for the introduction of spit and bite guards for officers to have available as a tactical option. Approval was given at this meeting for implementation of this tactic. This has mainly been in response to an increase nationally in assaults on Police Officers. Over 30 of the 43 UK Police forces have now approved and have implemented, the use of these items and their implementation and use is supported by the Home Secretary. At the SMB meeting, Board members fully supported the proposal and agreed to the introduction of spit and bite guards. The use of this option has also been supported by the National Police Federation and the CoLP Police Federation.

In the City of London, since April 2017 to November 2018 officers have completed 2277 Use of Force (UoF) reports. 666 UoF reports were documented as the offender offering Aggressive Resistance, and 50 documented as the offender offering Serious Aggressive Resistance.

Members may be concerned that this might increase the risk of complaints against Officers. However, Officers are being provided with approved training as part of their Personal Safety Training and the use of the guards is being governed by a comprehensive Standard Operating Procedure approved at January 2019 SMB, based on best practice. The use of spit and bite guards will be monitored via the completion of Use of Force forms and will be reported to the Force Use of Force Working Group which is chaired by the Superintendent Response and Operations. The number of complaints received as a result of the use of this tactic will also be monitored by the Professional Standards Department (PSD).

Recommendation

Members are asked to note the report.

Main Report

Background

1. In November 2018, the Force's Strategic Management Board (SMB) was presented with proposals by the Uniformed Policing Directorate (UPD) for the introduction of spit and bite guards for officers to have available as a tactical option. The proposal was supported by the CoLP Police Federation and has been supported nationally by the national Police Federation. This has mainly been in response to an increase nationally in assaults on Police Officers. Over 30 of the 43 UK Police forces have now approved and have implemented, the use of these items and their implementation and use is supported by the Home Secretary. At the SMB meeting, Board members fully supported the proposal and agreed to the introduction of spit and bite guards.
2. Assaults on Police Officers in the UK are at an all-time high. Operation Hampshire has been introduced regarding welfare of officers subject to assault, where the Police Federation are notified of assaults to ensure the welfare needs of officers who are victims of assault are met.
3. Police training has historically focused on physical holds to try and control detainees who may be spitting, trying to bite showing aggressive resistance or trying to assault officers in other ways. Whilst this has proved generally successful to prevent spit and other assaults, it does have potential risks around causing position asphyxia and / or breathing difficulties.

Current Position

4. In the City of London, since April 2017 to November 2018 officers have completed 2277 Use of Force (UoF) reports with 831 documented as alcohol related incidents. 666 UoF reports were documented as the offender offering Aggressive Resistance, and 50 documented as the offender offering Serious Aggressive Resistance. In 2018 to November, there were 8 near miss reports in relation to officers being spat at. More robust reporting processes have been put in place and more officers are now aware of the need to report these incidents.
5. The spit and bite guard is a breathable, mesh material garment that covers the face and head. This prevents the wearer from being able to assault officers, staff and members of the public by means of spitting, so reducing the potential of communicable/contagious diseases. The spit guard will NOT prevent biting - but could lessen the degree of injury and contamination.
6. The application of such restraints is clearly based on the individual officers' perception of the subject at the time and the independent factors surrounding the arrest and individual detainee and dynamic risk assessment.
7. Mental health, and or age would not be an automatic barrier to use of the equipment, but careful consideration would be given to all available information and a clear rationale must be in place to ensure that it is proportionate, lawful, accountable and necessary in the circumstances.

Basic Principles of usage of the spit and bite guard

8. The spit and bite guard can only be applied –
 - to a person who is spitting, has spat, is preparing to spit or is threatening to spit.
 - is biting, has bitten, is preparing to bite or is threatening to bite.
 - Previous instances of the above will not provide justification for its use in isolation, but combined with the above may provide justification.

The following considerations need to be considered when applying a spit and bite guard –

- Spit and bite guards should only be applied when the subject is under control, whether through use of multi officer restraint techniques and/or handcuffs.
- Spit and bite guards can be applied to a standing, kneeling or prone subject as long as they are under control. As with all restraint tactics, officers are reminded of the dangers associated with positional asphyxia and Acute Behavioural Disorder (ABD).
- The officer applying the spit and bite guard should where practicable, be additional to the officers restraining the subject.
- Where practicable a safety officer will be appointed and have responsibility for:
 - **Care** by monitoring the subject and being aware of their visible signs whilst they are wearing a spit and bite guard.
 - **Control** of the subject's head and monitor for signs of asphyxia or difficulty breathing - and the general situation.
 - **Communication** with the subject / officers involved in the restraint / custody officer.

Training and Standard Operating Procedure

9. The techniques for applying spit and bite guards are incorporated in the Officer Safety Manual. The spit and bite guards can be placed over the head of the subject when standing or in the prone position, if the subject is wearing glasses, these would have to be removed prior to the spit hood being used.
10. The training package includes a 15 minute video and discussion and practical training in relation to the application of the spit and bite guard and has been included in the existing officer Personal Safety Training (PST). This provides an excellent training opportunity which will ensure proper, effective and safe usage reducing the risk of any complaints. The level of complaint regarding use of force in the City of London is currently low and the City of London Police level of PST is exceptional and is managed by Learning and Development.
11. The Commissioner directed that a comprehensive Standard Operating Procedure be developed based on best practice in other forces and it was agreed that Cambridgeshire Constabulary SOP would be used as a basis as they were regarded as one of the Forces to have best practice in this area. The Force SMB agreed that the spit and bite guard would only be introduced after the SOP was presented to SMB which was submitted to the January 2019 SMB meeting and approved. Training has now commenced and the use of spit and bite guards has been implemented.

Monitoring and scrutiny

12. Officers are required to complete a form (Form 50) every time they are required to use force on a detainee and this now includes the application of a spit and bite guard. These are recorded on a database and reported to the Use of Force Working Group chaired by the Superintendent Response & Operations, UPD quarterly. A full statement will be completed by the officers justifying use of spit guards. Chief Inspector Specialist Support UPD is operational lead and will review all uses of this tactic until October 2019 (6 months) whilst it is bedding in and Professional Standards will be included in this review as will the Equality and Inclusion Manager. Any inappropriate use or complaints will be investigated by Professional Standards Department as a matter of course.
13. The number of complaints received as a result of the use of this tactic will also be monitored by the Professional Standards Department (PSD).

Corporate & Strategic Implications

14. This supports the City of London Police Corporate Plan 2018-23 ambitions:
 - **To deliver a policing service that is valued** by those who live, work and visit the City of London.
 - **To make the City of London the safest city area in the world**

This supports the City of London Corporation Corporate Plan 2018-23

- **To contribute to a flourishing society-** People are safe and feel safe

Conclusion

15. The introduction of the use of spit and bite guards as a tactical option for officers has been given due consideration and the Force has ensured that it has comprehensive training and SOP in place and that the use of this option is also monitored and scrutinised at the appropriate forum in Force. There is no doubt that the introduction of the spit and bite guard will provide officers with an option to enable them to manage any attempt at assault on the officer in a way that is safe for the detainee.

Contact:

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Chief Inspector Specialist Support

Uniformed Policing Directorate

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Agenda Item 8

Committee(s): Professional Standards and Integrity Committee of the Police Authority Board.	Date(s): 3 rd June 2019
Subject: HMICFRS Integrated PEEL Assessment 2018-19	Public
Report of: Commissioner of Police	For Information
Report author: Stuart Phoenix, Head of Strategic Development	

Summary

In May 2019, Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) published its report on the integrated PEEL (Police Efficiency, Effectiveness and Legitimacy) Assessment.

This paper presents is a high-level summary of the Legitimacy aspect of the report, which is relevant to the work of the Professional Standards and Integrity Committee.

The Force was assessed overall as follows:

Effectiveness	GOOD
Efficiency	GOOD
Legitimacy	REQUIRES IMPROVEMENT

A fuller report that covers Effectiveness and Efficiency, together with proposed actions to address the areas for improvement will be submitted to the Police Performance and Resource Management Sub Committee at its June 2019 meeting as part of the regular HMICFRS Update.

Recommendation

Members are asked to

- 1) Note the report

Main Report

Background

1. In 2018/19, HMICFRS adopted an integrated PEEL assessment (IPA) approach to its existing PEEL (police effectiveness, efficiency and legitimacy) inspections. IPA combines into a single inspection the effectiveness, efficiency

and legitimacy areas of PEEL. These areas had previously been inspected separately each year.

2. As well as HMICFRS inspection findings, their assessment is informed by their analysis of:
 - force data and management statements;
 - risks to the public;
 - progress since previous inspections;
 - findings from our non-PEEL inspections;
 - how forces tackle serious and organised crime locally and regionally; and
 - our regular monitoring work.

HMICFRS inspected all forces in four areas:

- protecting vulnerable people;
- firearms capability;
- planning for the future; and
- ethical and lawful workforce behaviour.

Current Position

3. For the Legitimacy aspect of the inspection, the Force has been assessed as follows:

Legitimacy	Overall: Requires improvement	Last inspected
Fair treatment of the public	Requires improvement	2018/19
Ethical and lawful workforce behaviour	Requires improvement	2018/19
Fair treatment of the workforce	Good	2017/18

4. HMICFRS Matt Parr commented that whilst HMICFRS are satisfied by most aspects of City of London Police's performance, the Force needs to make improvements in its legitimacy to provide a consistently good service.
5. It is noted the Force continues to uphold an ethical culture and promote standards of professional behaviour well. But the Force has more to do to assure itself that it has the capacity and capability to root out corruption. Also, the Force should make sure it has the necessary systems in place to reassure the public that it carries out stop and searches legitimately.
6. Specifically in relation to Legitimacy, the report identifies the following strengths and weaknesses:

- ✓ Leaders understand and values the benefits of community engagement.
- ✓ There is a positive culture around ethics and decision making
- ✓ Supervision of Stop and Search has vastly improved
- ✓ All members of workforce have received lowest level of vetting clearance for role.

- ✗ A major problem is a lack of external scrutiny.
- ✗ Whilst supervision and monitoring of stop and search has improved, more can be done to analyse use of these powers.
- ✗ Policy on body worn video does not state that officer should start recording at the beginning of a stop and search.
- ✗ Not all of workforce have received training in unconscious bias
- ✗ Whilst dataset on use of force has improved does not monitor use of force by individual officers including reviewing CCTV and BWV material (recent Custody inspection report makes more detailed reference).
- ✗ Needs to improve quality and content of anti-corruption assessment and control strategy
- ✗ Needs to improve the capacity and capability of its anti-corruption unit both level of establishment and ability to monitor IT systems
- ✗ Does not use organisation information (email accounts and logs from crime reports) to identify those who are at risk of corruption
- ✗ Not yet addressed previous recommendation to form links with agencies that support victims to seek information about officers abusing their position for a sexual purpose.
- ✗ Should provide guidance and briefings to all workforce re Abuse of Position not just new officers and supervisors.

7. For the Legitimacy pillar HMICFRS identified 5 AFIs:

AFI 7

The Force should ensure that effective external scrutiny takes place in relation to its use of force.

AFI 8

The Force should ensure that effective external scrutiny takes place in relation to its stop and search powers.

AFI 9

The Force should extend its unconscious bias training to all its workforce.

AFI 10

The Force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up to date and include current data.

AFI 11

The Force should ensure that its counter-corruption unit:

- Has enough capability and capacity to counter corruption effectively and proactively.

- Can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the force's data and identify computer misuse.
- Builds effective relationships with individuals and organisations that support and work with vulnerable people.

Conclusion

8. Whilst the Force is encouraged by the overall inspection results, it recognises there is work to do to address the identified areas for improvement. These are currently being A detailed update will be submitted to the Performance and Resource Management Sub Committee at its June 2019 meeting as part of the regular HMICFRS update.

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Committee(s): Professional Standards and Integrity Committee	Date: 3 June 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:

At the time this report was prepared, the dashboard, which is normally submitted to your Sub Committee for information had not been finalised for presentation to the Force's Integrity Board (ISB) and cannot therefore be appended to this report. The date of the ISB is 24th May 2019, which is post the Town Clerk's deadline for papers for your Sub Committee (21st May 2019). For the same reason, therefore, a verbal update of the ISB will be provided at your Sub Committee.

Code of Ethics Update:

Two London Police Challenge Forum (LCPF) events have recently taken place: 13th May 2019 hosted by CoLP and the 17th May 2019 hosted by the MPS. The same 4 dilemmas were considered by each panel. The next panel hosted by CoLP will be 13th September 2019 and will be observed by Bath Spa University as part of a PEER review, which has been arranged by the Force to establish how well ethics is embedded organisationally.

There have not been any regional or national meetings since your last Sub Committee; the next regional meeting of the Police Ethics Network will be on the 25th June 2019, and will be attended by the Head of Strategic Development (HoSD). A date for the next UK Police Ethics Guidance Group is still to be set, pending the appointment of a new Chairman.

The reviewed Integrity Standards Development Plan is also included for information. It includes an indicator to track progress against the (in development) action plan to address areas for further improvement identified in the Integrated PEEL Assessment published on 2nd May 2019. A separate report has been submitted to your Sub Committee for information on the legitimacy aspect of this report.

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.
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 A.

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.
4. At the time this report was prepared, the dashboard, which is normally submitted to your Sub Committee for information had not been finalised for presentation to the Force's Integrity Board (ISB) and cannot therefore be appended to this report. The date of the ISB is 24th May 2019, which is post the Town Clerk's deadline for papers for your Sub Committee (21st May 2019). For the same reason, therefore, a verbal update of the ISB will be provided at your Sub Committee.

Code of Ethics Update

5. Since your last Sub Committee there have been 2 London Police Challenge Forum (LPCF) events. The first was on 13th May 2019 hosted by CoLP, followed by one held on the 17th May 2019 hosted by the MPS. The same 4 dilemmas were considered by each panel. The outcome from those meetings is not yet in the public domain, however, they will be provided to Members for information separately.
6. The remaining scheduled LPCF events for 2019 are:
 - a. 10th June 2019 hosted by MPS/NCTPHQ
 - b. 19th June 2019 hosted by BTP
 - c. 9th September 2019 hosted by MPS/NCTPHQ
 - d. 13th September 2019 **hosted by CoLP**
 - e. 16th October 2019 hosted MPS/NCTPHQ
 - f. 17th October 2019 hosted by BTP
 - g. 5th December 2019 **hosted by CoLP**
 - h. 6th December 2019 hosted by MPS/NCTPHQ

7. Members are reminded that they are welcome to observe any panel.
8. The panel on the 13th September 2019 will be observed by a Professor of Ethics from Bath Spa University as part of a peer review which has been organised by the Force to establish the extent to which ethics has been embedded by the organisation. The event will be split over 2 days. The LPCF will be observed on day 1, and will include interviews with the members of that panel. Day 2 will take place on 4th October 2019 and will include focus groups, interviews with senior staff and a document review, conducted by a Chief Superintendent from Devon and Cornwall Police.
9. A report will be prepared following the review, which will be shared with Members of your Sub Committee.

Regional Police Ethics Network and UK Police Ethics Guidance Group

10. There have not been any regional or national meetings since your last Sub Committee; the next regional meeting of the Police Ethics Network will be on the 25th June 2019, and will be attended by the Head of Strategic Development (HoSD).
11. A date for the next UK Police Ethics Guidance Group is still to be set, pending the appointment of a new Chairman. The incumbent, Chief Constable Julian Williams is due to retire in June 2019, currently is not known who will take over the national portfolio for this area of business.

Integrity Standards Development Plan

12. The reviewed Integrity Standards Development Plan is included for information. 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'.
13. The development section contains those areas that the Force will introduce or explore over 2019/20.
14. The plan now references the areas for further improvement identified by Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services (HMICFRS) for the Legitimacy aspect of their Integrated PEEL Assessment. A separate report has been submitted to your Sub Committee providing more detail on that aspect of the inspection.
15. The plan also contained an indicator relating to whether an additional, internal board is necessary to consider ethical considerations of Force proposals or decisions. The matter had been referred to Organisational Development for consideration, however, a meeting of the Force's Chief Officer Team determined that existing mechanisms are sufficient, therefore that indicator has been closed on the dashboard.

Crime audits

16. 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.
17. The audit reports are submitted to the Crime Standards Board 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.

Appendices

- Appendix A – Integrity Standards Development Plan (to be considered by the Integrity Standards Board 24th May 2019)

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

2. Development Measures	Traffic Light Tracker			
	Mar 19	May 19		
2.1 Consider with HR/OD taking part in the long term 'ethical drift' survey	WHITE	AMBER		
2.2 Consider an internal board to advise on and review key decisions and processes	WHITE	CLOSED		
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	WHITE	WHITE		
2.4 Arrange an independent peer review of organisational integrity arrangements	WHITE	AMBER		
2.5 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assesment report when published.	WHITE	AMBER		

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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COMMITMENT DASHBOARD – These indicators represent provisions the Force must maintain as a foundation for its processes and governance concerning the continuing promotion and embedding of integrity and the Code of Ethics. Detailed reporting will be by exception if any of the provisions change from their ‘green’ implemented status.

INDICATOR	Current position (May 2019)	Mar 19	May 19		
1.1 Force has issued a statement committing to support and embed the Police Code of Ethics	Included in all major force publications – Policing Plan, Corporate Plan and Annual Report	GREEN	GREEN		
1.2 Maintain a Force Integrity Delivery Plan	Plan in existence since Nov 2016, updated quarterly	GREEN	GREEN		
1.3 Maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force	The Integrity Standards Board is established, chaired by a chief officer, attended by all directorates and representatives from the Town Clerk’s Department and Police Authority Board. The last meeting was March 2019	GREEN	GREEN		
1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas	In existence and attend Integrity Standards Boards	GREEN	GREEN		
1.5 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes	In existence, last outcomes published 20-23 March 2019 (checked May 2019)	GREEN	GREEN		
1.6 Maintain a process to support the Force’s participation in the London Panel Challenge Forum (Ethics Associates)	Maintained, last meetings 13 th and 17 th May, next meetings in September 2019	GREEN	GREEN		
1.7 Maintain a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan	The Assistant Commissioner is the lead for integrity matters, chairing Integrity Standards Board, Organisational Learning Forum, Crime Data Integrity Oversight Board and lead on the associated area of Professional Standards. The Commander (Ops) additionally chairs London Police Challenge Forum panels for additional resilience	GREEN	GREEN		
1.8 Ensure training on standards, values and leadership ethics is available for all staff	Information on standards, values and leadership is available to all staff on the intranet. Training courses incorporate the Code of Ethics, also part of induction.	GREEN	GREEN		
1.9 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures	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	GREEN	GREEN		

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1. 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	AMBER
CURRENT POSITION	
<p>May 2019 - Initial discussions have taken place with Organisational Development, who are broadly supportive of the proposal. A meeting is still to take place with HR. If HR agrees, a paper will be prepared for Integrity Standards Board to consider, to cover the proposal and roles and responsibilities.</p>	

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1. 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	ACTION CLOSED
CURRENT POSITION	
<p>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.</p> <p>May 2019 - This matter was considered at a meeting of the Senior Leadership Team who decided that a separate panel is not required. This action will not therefore be progressed and is CLOSED.</p>	

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2 Development Measures	
MEASURE	2.3 Conduct an annual review of the Force integrity programme and implement identified improvements
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure the Force continues to develop its approach to integrity and has plans to embed best practice.
MEASUREMENT	Review completed and reported to ISB
DUE BY	October 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	
The peer review (see following indicator) and anything emerging from regional and national meetings will inform this indicator, which is not due until October 2019.	

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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: Action taken to organise the review, or review complete but no changes to action plan. Red: review not yet complete or completed by no changes to action plan after 2 months
TRAFFIC LIGHT	AMBER
CURRENT POSITION	
<p>May 2019 – Contact has been made with Bath Spa University, who will oversee the Peer Review, with the following agreed:</p> <p>Professor McVean (Professor of Ethics Bath Spa University) to observe a meeting of the London Police Challenge Forum on 13 September 2019 and interview panel members. Ch Supt Sam De Reya (Devon and Cornwall Police) to visit the Force on October 4th to review existing provisions and conduct focus groups with senior personnel and front line personnel. A report will be prepared thereafter which will inform the development of this plan going forward.</p>	

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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 approval of action plan in development (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	AMBER
CURRENT POSITION	
<p>The Integrated PEEL report was published in early May. Whilst the Force was graded ‘Requires improvement’ for the Legitimacy aspect of the inspection, two of the areas identified for further improvement are relevant to integrity and the Code of Ethics:</p> <p>AFI 10 – The Force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up to date and include current data</p> <p>AFI 11 – The Force should ensure that its counter corruption unit (1) has enough capability and capacity to counter corruption effectively and proactively; (2) Can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the Force’s data and indentify computer misuse; and (3) Builds effective relationships with individuals and organisations that support and work with vulnerable people.</p> <p>An action plan to address all the AFIs identified in the report is currently being developed (due to be presented to the Police Performance and Resources Sub Committee and the next meeting of the Police Authority Board in July).</p>	

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