



## **Professional Standards and Integrity Committee of the Police Authority Board**

**Date:** WEDNESDAY, 18 SEPTEMBER 2019

**Time:** 10.30 am

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

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

**Enquiries:** Alistair MacLellan / [alistair.maclellan@cityoflondon.gov.uk](mailto: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. **MINUTES**  
To agree the public minutes and summary of the meeting held on 3 June 2019.  

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

**For Information**  
(Pages 7 - 8)
5. **FORCE RESPONSE TO HMICFRS INTEGRATED PEEL ASSESSMENT (LEGITIMACY) FINDINGS 2018-19**  
Report of the Commissioner.  

**For Information**  
(Pages 9 - 14)
6. **INTEGRITY DASHBOARD AND CODE OF ETHICS UPDATE**  
Report of the Commissioner.  

**For Information**  
(Pages 15 - 38)
7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
8. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
9. **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**
10. **NON-PUBLIC MINUTES**  
To agree the non-public minutes of the meeting held on 3 June 2019.  

**For Decision**  
(Pages 39 - 42)

11. **NON-PUBLIC REFERENCES**  
Report of the Town Clerk.  

**For Information**  
(Pages 43 - 44)
12. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 1 – 1 APRIL 2019 – 30 JUNE 2019**  
Report of the Commissioner.  

**For Information**  
(Pages 45 - 76)
13. **IOPC POLICE COMPLAINTS INFORMATION BULLETIN Q1 - CITY OF LONDON - 1 APRIL 2019 - 30 JUNE 2019**  

**For Information**  
(Pages 77 - 90)
14. **SUMMARY OF CASES**  

**For Information**  
(Pages 91 - 96)

  - a) Assessed as conduct or performance issue - case to answer / upheld (Pages 97 - 98)
  - b) Assessed as not conduct or performance issue - no case to answer / not upheld (Pages 99 - 108)
  - c) Local Resolution (Pages 109 - 122)
15. **EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES**  
Report of the Comptroller and City Solicitor.  

**For Information**  
(Pages 123 - 130)
16. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
17. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

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**PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE OF THE POLICE  
AUTHORITY BOARD  
Monday, 3 June 2019**

Minutes of the meeting of the Professional Standards and Integrity Committee of the Police Authority Board held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Monday, 3 June 2019 at 11.00 am

**Present**

**Members:**

Alderman Alison Gowman (Chair)  
Tijs Broeke  
Alderman Emma Edhem  
Deborah Oliver  
Deputy James Thomson (Ex-Officio Member)

**City of London Police Authority:**

Simon Latham	- Deputy Chief Executive of Police Authority
Oliver Bolton	- Deputy Head of Police Authority Team
Alistair MacLellan	- Town Clerk's Department

**City of London Police Force:**

Alistair Sutherland	- Assistant Commissioner
Maria Woodall	- Detective Chief Superintendent
Glenn Maleary	- Chief Superintendent
Stuart Phoenix	- City of London Police

**1. APOLOGIES**

Apologies were received from Doug Barrow, Nick Bensted-Smith and Mia Campbell.

**2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were no declarations.

**3. TERMS OF REFERENCE**

**RESOLVED**, that the terms of reference of the Committee be received.

**4. APPOINTMENT OF CO-OPTED MEMBERS**

The Chair noted that no formal expressions of interest had been submitted to the Town Clerk ahead of 31 May 2019 deadline, but that she was aware of two Members of the Court of Common Council who wished to serve as co-opted Members, namely James Tumbridge, who had served on the Committee during 2018/19, and Caroline Addy.

Members agreed that, in light of his contribution to the work of the Committee during the past year, James Tumbridge should be co-opted for 2019/20 subject to confirmation of his willingness to serve.

Members discussed the co-option of Caroline Addy, noting her skills and experience as a junior Counsel with One Brick Court Chambers and Doughty Street Chambers. Members were mindful that, in light of the co-option of Mr Tumbridge, the co-option of Ms Addy would ensure an appropriate balance of diversity on the Committee particularly with regards to gender.

**RESOLVED**, that subject to their willingness to serve, James Tumbridge and Caroline Addy be co-opted on to the Professional Standards and Integrity Committee of the Police Authority Board for 2019/20 **(5/2019/P)**.

5. **MINUTES**

**RESOLVED**, that the public minutes and non-public summary of the meeting held on 15 March 2019 be approved as a correct record.

6. **OUTSTANDING REFERENCES**

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

**3/2018/P – Staff Survey**

- The Assistant Commissioner noted that the next Staff Survey would be conducted in January 2020 and that the Force was currently considering what organisation would be a suitable delivery partner. The Force was reviewing the format of the Authority's staff survey given this was deemed user-friendly and easy to interpret. The action plan had been circulated to Members.

**1/2019/P – Dashboard Format**

- The Commissioner agreed to circulate the revised dashboard to Members outside of the meeting.

**RESOLVED**, that the report be received.

7. **INTRODUCTION OF SPIT AND BITE GUARDS**

Members considered a report of the Commissioner regarding the introduction of Spit and Bite Guards and the following points were made.

- The Commissioner reported that a spit and bite guard had been applied on two occasions since April 2019. The circumstances of both applications had been fully reviewed to ensure officers had applied their training and that the guards had been appropriately applied.
- The Commissioner outlined the circumstances of one application of a spit and bite guard, on a shoplifting suspect on 10 May 2019. The application of the guard to the suspect had been the culmination of ten distinct stages to the overall situation, commencing with the officer inviting the suspect to calm down.

- The application of a guard was up to the individual officer concerned (i.e. an officer would never be ordered to apply a guard). Moreover, the guards were designed to be as transparent as possible to reduce the suspect's sensory deprivation. To date, no complaints had been received. All officers who were trained in the application of guards were issued with a single guard, and guards would not normally be reissued until the officer's original guard had been used i.e. an officer would not be able to stockpile a number of guards in their possession.
- In response to a question, the Commissioner replied that the use of spit and bite guards had not been reviewed by the Independent Advisory Group (IAG), but the Equalities and Inclusion Officer who advised the IAG had inspected the guards. The Commissioner noted that the Force was open to visits by either the IAG or Members of the Authority to observe training sessions.
- In response to a question, the Commissioner confirmed that the application of a guard would be recorded as a use of force.
- The Town Clerk agreed to liaise with the Force to enable Members of the Authority to attend use of force training **(6/2019/P)**.

**RESOLVED**, that the report be received.

**8. HMICFRS INTEGRATED PEEL ASSESSMENT 2018-19**

Members considered a report of the Commissioner regarding the HMICFRS Integrated PEEL Assessment 2018/19 and the following points were made.

- The Commissioner noted that no formal recommendations had been made by the Inspector, which was to be welcomed.
- In response to a comment, the Assistant Commissioner agreed to review whether it would be appropriate for the Force to issue a formal response to the recent City Matters article regarding the HMICFRS Integrated PEEL Assessment **(7/2019/P)**.
- In response to a comment, the Commissioner agreed to review the Force's communications plan to ensure there was reference to ensuring appropriate systems were in place to reassure the public **(8/2019/P)**.
- In response to a comment, the Commissioner agreed that the current lack of monitoring of use of force including the review of CCTV and body worn cameras fell within the remit of the Committee and would be the subject of a report at the September 2019 meeting **(9/2019/P)**.

**RESOLVED**, that the report be received.

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

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

- In response to a comment, the Commissioner noted that the development measures were classed as Amber to illustrate the fact that work on them was ongoing.
- In response to a comment, the Assistant Commissioner agreed that the language around training on standards, values and leadership should be amended to make clear the training was mandatory **(10/2019/P)**.

**RESOLVED**, that the report be received.

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

**Review of Cancelled Speeding Tickets**

In response to a question, the Commissioner agreed to circulate a briefing note to Members regarding the cancellation of speeding tickets within the City of London Police Force Area, following a recent report on the issue on the financial website *This is Money* on 8 May 2019 **(11/2019/P)**. The Assistant Commissioner noted that the Force had to date included emergency response vehicles using their lights in overall statistics for speeding, but that this practice would be discontinued going forward.

**Predictive Policing / Home Office National Data Analytics Solution**

In response to a question prompted by recent concerns raised by the West Midlands Police Ethics Committee on that Force's involvement in the Home Office National Data Analytics Solution, the Detective Chief Superintendent agreed to provide a reply to the Committee outside of the meeting **(12/2019/P)**. The Assistant Commissioner noted that the Force, at present, relied on the use of historic data rather than predictive solutions, and that appropriate consultation would take place before such an approach was adopted by the Force. Finally, the Assistant Commissioner confirmed that the Force had been involved in discussions around the potential for a Facial Recognition trial.

11. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**

**New Director of Professional Standards**

The Assistant Commissioner noted that Detective Superintendent Angie Rogers had been appointed Director of Professional Standards in the room of Detective Chief Superintendent Maria Woodall and would take up the role from July 2019. The Chair requested a meeting with Supt. Rogers as soon as was convenient **(4/2019/P)**.

12. **EXCLUSION OF THE PUBLIC**

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

13. **NON-PUBLIC MINUTES**

**RESOLVED**, that the non-public minutes of the meeting held on 15 March 2019 be approved as a correct record.

14. **NON-PUBLIC OUTSTANDING REFERENCES**  
Members considered a report of the Town Clerk regarding non-public outstanding references.
15. **11/2019/NP - FORCE RESPONSE TO HMICFRS COMPLAINTS AND MISCONDUCT FILE REVIEW**  
Members considered the Force Response to non-public outstanding reference 11/2019/NP HMICFRS Complaints and Misconduct File Review.
16. **IOPC POLICE COMPLAINTS INFORMATION BULLETIN - CITY OF LONDON - APRIL 2018 - MARCH 2019**  
Members considered the IOPC Police Complaints Information Bulletin – City of London – April 2018 – March 2019.
17. **EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES**  
Members considered a report of the Comptroller & City Solicitor regarding Employment Tribunal and Other Legal Cases.
18. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 4 – 1 JANUARY 2019 – 31 MARCH 2019**  
Members considered a report of the Commissioner regarding Professional Standards Statistics for Quarter 4 – 1 January 2019 – 31 March 2019.
19. **SUMMARY OF CASES**  
Members considered a summary of cases.
  - 19.1 **Misconduct - Gross Misconduct**  
Members considered reports regarding Misconduct – Gross Misconduct.
  - 19.2 **Case to Answer**  
Members considered reports regarding Case(s) to Answer.
  - 19.3 **No Case to Answer**  
Members considered reports where there was No Case to Answer.
  - 19.4 **Local Resolution**  
Members considered reports of cases that had been dealt with via Local Resolution.
20. **GLOSSARY**  
Members received a Glossary.
21. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**  
There were no non-public questions.

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

There was no non-public other business.

**The meeting ended at 12.32 pm**

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Chair

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PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

**PUBLIC OUTSTANDING REFERENCES**

3/2018/P	7 December 2018 Item 5 - Staff Survey Response	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 - next Staff Survey will be conducted in January 2020, and action plan has been circulated.
1/2019/P	15 March 2019 Item 6 – Integrity Dashboard	Revised Dashboard to be circulated to Members outside of the meeting	Stuart Phoenix	Completed – email to Members on 3 June 2019 at 1.27pm
4/2019/P	3 June 2019 Item 4 – Co-Opted Members	Chair to meet with new Head of Professional Standards Directorate	Alistair Sutherland	Update at the September 2019 meeting
5/2019/P	3 June 2019 Item 4 – Co-Opted Members  Invitation to Serve as Co-Opted Members	James Tumbridge and Caroline Addy to be Co-opted on to the Committee for 19/20 subject to their willingness to serve.	Alistair MacLellan to liaise with Chair	Completed
6/2019/P	3 June 2019 Item 7 – Spit and Bite Guards	Police Authority Board Members to be invited to attend use of force training.	Glenn Maleary	Completed – Police Authority Board Members were offered dates during June 2019
7/2019/P	3 June 2019 Item 8 – PEEL Assessment	Police Force consider how to respond to Anti-Corruption story in City Matters	Alistair Sutherland	Update at the September 2019 meeting

PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

8/2019/P	3 June 2019 Item 8 – PEEL Assessment	Force Communications Plan to be reviewed to ensure it references steps to reassure public over the use of stop and search.	Alistair Sutherland	Update at the September 2019 meeting
9/2019/P	3 June 2019 Item 8 – PEEL Assessment	Report back to September 2019 Committee regarding Legitimacy issues identified by PEEL inspection e.g. Body Worn Video.	Stuart Phoenix	Completed
10/2019/P	3 June 2019 Item 9 – Integrity Dashboard	Language in Police Integrity Development and Delivery Report around training on values and standards to be amended to make clear it refers to mandatory training.	Stuart Phoenix	Completed
11/2019/P	3 June 2019 Item 10 – Questions	Report on Speeding tickets to be circulated to PSI Committee by email	Maria Woodall	Completed – emailed to PSI Committee on 6 June 2019 at 4.13pm
12/2019/P	3 June 2019 Item 10 – Questions	Force to provide response on potential use of predictive policing methods to PSI Committee by email	Maria Woodall	Completed – emailed to PSI Committee by email on 4 June 2019 at 3.19pm

# Agenda Item 5

<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Date(s):</b> 18 <sup>th</sup> September 2019
<b>Subject:</b> Force response to HMICFRS Integrated PEEL Assessment (Legitimacy) Findings2018-19	<b>Public</b>
<b>Report of:</b> Commissioner of Police	<b>For Information</b>
<b>Report author:</b> Head of Strategic Development, City of London Police	

## Summary

At your Committee's meeting on 3<sup>rd</sup> June 2019, the City of London Police reported the findings of Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) on the Legitimacy aspect of its integrated PEEL (Police Efficiency, Effectiveness and Legitimacy) Assessment.

This paper presents is a summary of the Force's response to those findings to provide Members with assurance that the City of London Police is addressing the issues raised by HMICFRS. Specifically, the report provides details of action taken to address the formal areas for further improvement (AFIs) and additional comments made by HMICFRS:

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.

Adverse comments not forming part of an AFI:

- Policy on body worn video does not state that officers should start recording at the beginning of a stop and search.
- Whilst dataset on use of force has improved, it does not monitor use of force by individual officers including reviewing CCTV and BWV material
- Should provide guidance and briefings to all workforce re Abuse of Position not just new officers and supervisors

### **Recommendation**

Members are asked to note the report.

## **Main Report**

### **Background**

1. At your Committee's meeting on 3<sup>rd</sup> June 2019, the City of London Police reported the findings of Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) on the Legitimacy aspect of its integrated PEEL (Police Efficiency, Effectiveness and Legitimacy) Assessment.
2. Your Committee requested details of the Force's response to those findings be submitted to its next meeting. This paper presents those details and provides Members with assurance that the City of London Police is addressing the issues raised by HMICFRS. Specifically, the report provides details of action taken to address the formal areas for further improvement (AFIs) and additional comments made by HMICFRS.

### **Current Position**

#### **Formal Areas for Further Improvement (AFIs)**

**AFI 7 - The Force should ensure that effective external scrutiny takes place in relation to its use of force.**

3. This AFI and AFI 8 immediately below, has been addressed by a newly constituted Community Scrutiny Group that is being overseen by the Superintendent Communities in Uniform Policing. Considerable efforts have been made to attract new members to this group and an introductory day took place on the 11<sup>th</sup> June 2019. The recruitment campaign resulted in 12 people being put forward for vetting to enable them to take part in the forum. Draft terms of reference for the group have been produced and will be considered by the group at their first meeting (which will be a joint meeting with the Independent Advisory Group) on September 4<sup>th</sup>.
4. The group will initially consider Stop and Search and Use of Force, but feedback will also be sought as to the groups' views regarding other force practices. Future meetings will be scheduled by the group when they meet on the 4<sup>th</sup> September.

**AFI 8 - The Force should ensure that effective external scrutiny takes place in relation to its stop and search powers**

5. See response for AFI 7 immediately above.

**AFI 9 - The Force should extend its unconscious bias training to all its workforce**

6. HMICFRS recognised that most but not all the workforce receive unconscious bias training. The May 2019 force Training Improvement Board considered this issue and approved the delivery of unconscious training via an e-learning package. This is now mandatory training for the whole workforce. Monitoring will take place in autumn 2019.

**AFI 10 - The Force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up to date and include current data**

7. The Counter Corruption Strategy has been reviewed and revised to address the issues highlighted in the AFI. It has been signed off by the (then) Head of Professional Standards Unit (now Head of Crime) and the Assistant Commissioner. Due to its nature, it is not published.

**AFI 11 - The Force should ensure that its counter-corruption unit:**

- **Has enough capability and capacity to counter corruption effectively and proactively.**
8. This was an area that was cited as critical by the Chief Officer Team in making their case for an uplift in funding to provide additional officers and staff for the Force. As a direct result of that request, 2 additional posts are currently being advertised. Together with collaborative work with the British Transport Police in this area, this uplift will provide the necessary capacity and capability 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.**
9. An appropriate software system that can be utilised within the Counter Corruption Unit to support its audit capability has been identified, it is currently being used by 22 other forces so has a proven track record. The system has not yet been procured and the delay in implementation has now been escalated as a formal risk.
- **Builds effective relationships with individuals and organisations that support and work with vulnerable people.**
10. Professional Standards (PSD) have commenced a series of community engagement exercises, in conjunction with established community policing

activities to promote and make PSD more accessible. This includes organisations that support and work with vulnerable people. Ongoing attendance will reinforce acceptable and non-acceptable standards of behaviours and avenues for reporting any form of abuse or matters of concern. To date this has included attendance at:

- a) Community Surgery at Salvation Army at their HQ on Upper Thames Street.
  - b) Annual Community Meeting at Guildhall with many agencies present to offer advice to the community. This meeting was held at lunch time with another in the evening to enable the Corporation to update its residents.
  - c) Community Meeting at Bart's Hospital.
11. New safeguarding arrangements in the City of London and Hackney are being developed, which will provide further opportunities to raise awareness by PSD going forward. Consideration is also being given to publishing an article in Skyline (external community engagement vehicle) to raise awareness of the force's attitude towards corruption / abuse of position, supporting vulnerable people and how individuals can report concerns.
12. PSD will also better exploit existing avenues that exist and which have a role in supporting the vulnerable, including:
- a) Working with the Force Vulnerable Victim Advocate for them to raise awareness on behalf of PSD with agencies they engage with;
  - b) Working with the Head of Community Safety to establish relationship and work with them to raise awareness around abuse of position; and
  - c) Working with Force Vulnerability Strand Leads to promote avenues of reporting with 3<sup>rd</sup> party groups they work with in particular areas.

### **HMICFRS observations on additional improvements**

#### **Policy on body worn video does not state that officers should start recording at the beginning of a stop and search.**

13. A Body Worn Video Super User Group has been established with overall ownership and management sitting within the Crime Directorate led by D/Supt Crime. This Group meets monthly, supplemented by a quarterly Gold Group. The existing Standard Operating Procedure (SOP) has been reviewed and now incorporates details of when it is mandatory to activate, which includes at the beginning of a stop and search. The revised SOP was published in August 2019 and has been given a review date of 1 year to ensure it continues to reflect emerging best practice.

#### **Whilst dataset on use of force has improved, it does not monitor use of force by individual officers including reviewing CCTV and BWV material**

14. This was originally raised as an issue in the inspection of Custody, which took place before the PEEL inspection. It was evident that there were either recording or compliance issues as records from Custody and the system being used to record use of force (Pronto) did not fully reconcile. The reviews conducted since have shown where errors were occurring, however, since remedial action has been taken, compliance rates have improved significantly since 3<sup>rd</sup> June 2019 (see table below) and continue to be monitored. This should improve further as errors are identified, feedback is given and officers are requested to amend information.

Week Commencing	17/06/19	01/07/19	15/07/19	29/07/19
Compliance rate	77%	82%	90%	90%

15. A new dip sampling form is also now being used, which includes reviewing CCTV and Body Worn Video footage to ensure they correspond with written records. The gleaned learning points will be part of the feedback to not only Custody staff but to the Force more widely through organisational learning provisions.

**Should provide guidance and briefings to all workforce re Abuse of Position not just new officers and supervisors.**

16. Professional Standards Department (PSD) have introduced a programme of drop in awareness raising sessions being held at various locations around force to promote supportive activities PSD can provide, rules and regulations that guide investigations and recently introduced National Police Chiefs' Council/College of Policing Appropriate Personal Relationships and Behaviours in the Workplace Guidance. PSD also has at its disposal the now established quarterly Professionalism Newsletter which can be used to 'drip feed' messaging about abuse of position.

17. The Anti-Corruption Policy / SOP (an unrestricted document) is due for review in November 2019. Consideration is being given to promoting this with a news article launch around anti-corruption and abuse of position

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# Agenda Item 6

<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Date:</b> 18 <sup>th</sup> September 2019
<b>Subject:</b> Integrity Dashboard and Code of Ethics Update	<b>Public</b>
<b>Report of:</b> Commissioner of the City of London Police	<b>For Information</b>
<b>Report author:</b> Head of Strategic Development, City of London Police	

## Summary

### *Integrity Standards Board and Dashboard:*

The Integrity Standards Board met on 3<sup>rd</sup> September 2019, chaired by the Assistant Commissioner. In addition to a discussion on revised terms of reference, the Integrity Dashboard was covered in detail, which did not disclose any underlying causes for concern. The meeting also received an update from the Head of Strategic Development on regional developments relating to the Code of Ethics, and an update on crime audits from the Force Crime and Incident Registrar. The Integrity Standards Development plan was also considered.

### *Code of Ethics Update:*

Two London Police Challenge Forum (LCPF) events were due to take place on 10<sup>th</sup> and 19<sup>th</sup> June 2019 hosted by MPS/NCTPHQ and the British Transport Police respectively, however, due to availability of ethics associates, the event on the 19<sup>th</sup> June was cancelled. 4 dilemmas were considered by the remaining panel. The next panel hosted by CoLP (which will have happened by the time your Committee meets) will be 13<sup>th</sup> 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.

The Head of Strategic Development attended the last regional meeting on the 25<sup>th</sup> June 2019.

The Integrity Standards Development Plan is also included for information. It includes an indicator to track progress against the areas for further improvement identified in the Integrated PEEL Assessment published on 2<sup>nd</sup> May 2019. A separate report has been submitted to your Committee detailing the Force's response to that inspection's findings. There is one red area in the plan, relating to the Force's potential involvement in a long term survey assessing ethical drift. The Head of Strategic Development has been tasked with progressing this with Learning and Development.

## 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 and 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 Committee and a representative from the Town Clerk's department.
4. The ISB met on 3<sup>rd</sup> September and was chaired by the Assistant Commissioner. The meeting covered the following topics:
  - a. Updated terms of reference. These were agreed subject to an amendment to split the meeting into two halves, with the second have a closed session with the HR Director, Professional Standards Department and Directorate Heads to consider confidential issues.
  - b. Dashboard. The revised dashboard was received with each indicator examined during the meeting. The information in the dashboard did not raise any causes for concern. A number of minor issues were referenced at the meeting to improve future reporting, these included:
    - i. The need for information providers to supply better contextual analysis linking the information specifically to the Code of Ethics/Integrity;
    - ii. A direction from the Assistant Commissioner that random drug testing should be conducted and overseen by Professional Standards and not Learning and Development; and
    - iii. Finance-related indicators still need to be incorporated.
  - c. Members are asked to note that the dashboard appended to this report as Appendix A has been slightly amended to reflect the issues raised at the ISB. The dashboard is now cross referenced to Organisational Learning Forum (OLF) reports to ensure that any learning referred to OLF around Integrity is also reflected within the dashboard.

- d. National Crime Recording Standard Audits – The Force Crime and Incident Registrar (FCIR) explained that due to the high levels of data cleansing that has taken place over the past quarter, the usual crime audits have had to be deferred to the second quarter. The FCIR did not raise any integrity-related concerns as a result of their work.
- e. The Head of Strategic Development provided an update on what activities and initiatives forces regionally are doing around the Code of Ethics (see paragraph 5 *et seq* below).
- f. The Integrity Development Plan was considered. The only red area relates to the Force potentially taking part in a long term survey to measure ethical drift. It was agreed that the Head of Strategic Development should liaise with Learning and Development and Organisational Development to progress. It was also agreed that going forward, progress against the integrity related areas for further improvement identified in the PEEL Legitimacy inspection should be submitted to the ISB.
- g. Finally, the Head of Strategic Development was tasked with preparing a report for the next ISB highlighting any trends or themes nationally coming out of the regional/national integrity groups.

#### *Code of Ethics Update*

5. Since your last Committee 2 London Police Challenge Forum (LPCF) events were scheduled to take place (10<sup>th</sup> and 19<sup>th</sup> June 2019). Unfortunately 1 of the events had to be cancelled due to the availability of ethics associates.
6. The remaining scheduled LPCF events for 2019 are:
  - a. 9<sup>th</sup> September 2019 hosted by MPS/NCTPHQ
  - b. 13<sup>th</sup> September 2019 **hosted by CoLP**
  - c. 16<sup>th</sup> October 2019 hosted MPS/NCTPHQ
  - d. 17<sup>th</sup> October 2019 hosted by BTP
  - e. 5<sup>th</sup> December 2019 **hosted by CoLP**
  - f. 6<sup>th</sup> December 2019 hosted by MPS/NCTPHQ
7. Members are reminded that they are welcome to observe any panel.
8. The panel on the 13<sup>th</sup> 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 4<sup>th</sup> 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 Committee.

### ***Regional Police Ethics Network and UK Police Ethics Guidance Group***

10. There last Regional Police Ethics Network was held on the 25th June 2019, and was attended by the Head of Strategic Development. The meeting, which welcomed the National Police Air Service (NPAS) as members for the first time, received updates on the following topics:
  - a. Digital policing integrity framework – this is progressing and a working group has been set up by the MPS to include representatives from policing and other agencies to agree an ethical framework that can be applied to digital policing. There is currently no detailed plan or date when this is expected to be complete.
  - b. The National Police Chiefs' Council's Inappropriate Relationship Guidance has been published.
  - c. The 'Knowledge Hub' is being trialled by Devon & Cornwall and Kent (in lieu of POLKA), as a means to share best practice and news relating to the Code of Ethics, although it is too early to assess its success.
  - d. There is likely to be an extraordinary UK Police Ethics Guidance Group looking at whether undercover policing is incompatible with the Code of Ethics. The event will consist of invited delegates of appropriately vetted/experienced people. The City of London Police has expressed an interest in taking part.
  - e. Wiltshire Police have developed the "Siren" App, which allows officers to pose an ethical dilemma they are facing, for a real time response. Future meetings will assess how this is being used and resourced.
  - f. Many forces are reviewing again where 'ethics' sits in their organisations, with a general move to single service provision with Professional Standards Departments.
  - g. The Regional Conference, which is likely to be deferred to early 2020, is expected to focus on ethical leadership.

11. The next meeting is scheduled for the 8th October 2019.

### ***Integrity Standards Development Plan***

12. The Integrity Standards Development Plan is included for Members' information at Appendix B. 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 has introduced for 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 Committee that provides a more detailed update of progress against the areas identified for further improvement.

15. The only red area relates to the Force potentially taking part in the long term survey designed to measure ethical drift. Following an initial meeting with HR, the Head of Strategic Development has been tasked to liaise with Learning and Development and Organisational Development to progress this.

## **Appendices**

- Appendix A – Integrity Dashboard Quarter 1
- Appendix B – Integrity Standards Development Plan (September 2019 update)

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CITY OF LONDON POLICE

**INTEGRITY  
DASHBOARD 2019/20  
Quarter 1**  
Version 1.0



## Rationale for Integrity Dashboard

**The Integrity Dashboard will report on indicators designed to monitor how the Force is delivering the Police Code of Ethics and highlight behaviour of staff that may not meet the standards set out within the code. The code of ethics is detailed below for reference within this document.**

### Police Code of Ethics:

**1. Honesty and integrity**

I will be honest and act with integrity at all times, and will not compromise or abuse my position.

**2. Authority, respect and courtesy**

I will act with self-control and tolerance, treating members of the public and colleagues with respect and courtesy.

I will use my powers and authority lawfully and proportionately, and will respect the rights of all individuals.

**3. Equality and diversity**

I will act with fairness and impartiality. I will not discriminate unlawfully or unfairly.

**4. Use of force**

I will only use force as part of my role and responsibilities, and only to the extent that it is necessary, proportionate and reasonable in all the circumstances.

**5. Orders and instructions**

I will, as a police officer, give and carry out lawful orders only, and will abide by Police Regulations.

I will give reasonable instructions only, and will follow all reasonable instructions.

**6. Duties and responsibilities**

I will be diligent in the exercise of my duties and responsibilities.

**7. Confidentiality**

I will treat information with respect, and access or disclose it only in the proper course of my duties.

**8. Fitness for work**

I will ensure, when on duty or at work, that I am fit to carry out my responsibilities.

**9. Conduct**

I will behave in a manner, whether on or off duty, which does not bring discredit on the police service or undermine public confidence in policing.

**10. Challenging and reporting improper behaviour**

I will report, challenge or take action against the conduct of colleagues which has fallen below the standards of professional behaviour.

## Public Confidence Indicator

FORCE INTEGRITY INDICATORS							
Number	Indicator	2018 Survey Results					
PC 1	Community Survey Question 4: If you were to have contact with the city of London Police they would act with Integrity.	Survey Type and number of respondents	Percentage Strongly Agree	Percentage Tend to Agree	Percentage Neither Agree or Disagree	Percentage Tend to Disagree	Percentage Strongly Disagree
		Street (507)	50	40	9	1	0
		Online (439)	50	38	9	2	1
<p><b>Rationale:</b> This question is asked as part of the public survey and will identify if the Force needs to take action to address how it is perceived by the public. The integrity question asked on the survey will allow the Force to review feedback and address any comments as part of its planning process.</p> <p>The measure will also look to monitor any perception that the public may have of the Force as a result of dealings with officers or through word of mouth and analysis of any comments made by the public will be provided here for additional context.</p> <p><b>Analysis:</b> Respondents generally had a positive view of the Force in replies to the 2018 survey. 90% of street survey respondents were positive with the integrity questions with 88% of online respondents also providing a positive view in this area. This suggests a very good public perception of the Force.</p> <p>These questions will be replicated for the 2019 survey so there can be direct comparison.</p>							
PC 2	Victim Satisfaction Survey: Satisfaction with the way you were treated by the police officers and staff who dealt with you	Percentage of respondents that felt	Q1 Number of respondents & satisfaction %	Q2 Number of respondents & satisfaction %	Q3 Number of respondents & satisfaction %	Q4 Number of respondents & satisfaction %	
		Were fair in the way they dealt with you	No Data				
		Treated you with respect	No Data				
<p><b>Rationale:</b> The victim satisfaction survey is undertaken quarterly to assess how the Force deals with victims of crime. The question on how victims were treated by our staff will allow the Force to identify if officers and staff are following the code of ethics for behaviour when dealing with victims of crime.</p> <p>Victims are likely to be upset and distraught when initial police contact occurs and their perception of their treatment will reflect how officers and staff have been trained to deal with the public in what can be difficult and upsetting circumstances.</p> <p><b>Analysis:</b> Quarter 1 data is currently unavailable and will be reported on retrospectively once the survey has been completed and analysed. This is expected in time for Q2.</p>							

## HR Indicators

FORCE INTEGRITY INDICATORS											
Number	Indicator	Number of Upheld Grievances Relating to Integrity					Number of Upheld Grievances Made Per Quarter				
HR 1	Number of Grievances registered with HR Relating to Code of Ethics Issues	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		4					4	4			
<p><b>Rationale:</b> To monitor the number and themes of grievances investigated within Force to note any potential Code of Ethics issues.</p> <p><b>Historical Data:</b> 2014/15: 7 Grievances 2015/16: 7 Grievances 2016/17: 13 Grievances 2017/18: 8 Grievances 2018/19: 12 Grievances</p> <p><b>Analysis:</b> 4 Grievances were submitted in the quarter, 3 of which would be related to code of ethics issues ( 1 x Honesty and Integrity, 1 x Equality and Diversity and 1 x Confidentiality).</p> <p>Of the 4 Grievance submitted in the period the non- integrity related Grievance has been concluded and was partially upheld. The 3 integrity related grievances have not concluded at the time of this submission.</p>											
Number	Indicator	Number of employment Tribunals Relating to Integrity					Number of Employment Tribunals held Per Quarter				
HR 2	Number of Employment Tribunals that cite Code of Ethics Issues	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0				0	2				2
<p><b>Rationale:</b> To monitor the number and allegations of tribunals to note any potential Code of Ethics issues.</p> <p><b>Historical Data:</b> 2014/15: 2 Tribunals 2015/16: 0 Tribunals 2016/17: 2 Tribunals 2017/18: 2 Tribunals 2018/19: 1 Tribunal</p> <p><b>Analysis:</b> 2 ET hearings were held, both relating to Equality and Diversity. At date of submission we are still awaiting the decision of the both ET hearings</p>											
Number	Indicator	Number of leavers per quarter					Number of leavers stating Integrity as a reason for leaving the organisation				
HR 3	Number of Police Officer Leavers stating Code of Ethics Issues as a reason for leaving the organisation	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		18				18	1				1
HR 3	Number of Support Staff Leavers stating Code of Ethics Issues as a reason for leaving the organisation	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		12				12	1				1
<p><b>Rationale:</b> This will monitor the number of Force leavers (police &amp; support staff) for each quarter and identify if there are any trends through exit interviews that are linked to Code of Ethics for why staff are leaving the organisation.</p> <p><b>Analysis:</b> Of the 18 Officers left in this quarter (5 officers completed exit interviews), (Of the 18 leavers 7 x Retirement &amp; 6 transferred Forces). 1 Officer stated a Code of Ethics issues as a reason for leaving (Equality &amp; diversity/conduct). Of the 12 Police Staff left in this quarter, 8 staff completed Exit interviews. 1 member of Police staff stated a code of ethics as a reason for leaving (Authority, respect and courtesy). This individual is one of the applicants in one of the Employment Tribunals referred to in HR2.</p>											

Appendix A

Number	Indicator	Number of dismissals per quarter				
		QTR 1	QTR 2	QTR 3	QTR 4	Total
HR 4	Number of Dismissals as a result of Code of Ethics Issues	0				0
	<i>Rationale: This will monitor the number of dismissals (police &amp; support staff) for each quarter and identify if there are any trends that are linked to Code of Ethics for why staff are being dismissed.</i>					
	<i>Analysis: N/A</i>					

Learning & Development Indicators

FORCE INTEGRITY INDICATORS												
Number	Indicator	Number of Random Tests Per Quarter					Number of Positive Tests Per Quarter					
		QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total	
L&D 1	Quarterly Random Drug Testing	0				0	0				0	
	<i>Rationale: To ensure Police Officers are tested as part of the Force random drug testing policy so that there are no issues with the misuse of drugs within the workforce.</i>											
	<i>Historical Data: 2016/17: 0 Positive Tests 2017/18: 0 Positive Tests 2018/19: 0 Positive Tests</i>											
<i>Analysis: No drug testing undertaken in the 1<sup>st</sup> quarter due to inappropriate facilities following accommodation move. Additionally, L &amp; D have reported that the process is currently under review with a decision expected in September. It is understood that the accommodation issues have been resolved, and the Assistant Commissioner has directed that going forward, these tests should be administered and overseen by Professional Standards.</i>												
Number	Indicator	# Disclosure Courses Undertaken within Quarter					Total Number of Officers Trained in Disclosure					
L&D 2	Code of Ethics Training Given as part of existing Mandatory Training Courses	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total	
		3				3	36				36	
		# Stop & Search Courses Undertaken within Quarter					Total Number of Officers Trained in Stop & Search					
		QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total	
		1				1	10					10
		# Vulnerability Courses Undertaken within Quarter					Total Number of Officers Trained in Vulnerability					
		QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total	
9				9	84					84		
<i>Rationale: To show how many officers are receiving training on Code of Ethics as part of their courses. The information will be taken from the L&amp;D Dashboard showing the number of courses within the quarter and the overall number of staff trained.</i>												
<i>Analysis: Training for disclosure, stop/search and vulnerability is up to date and on target, the numbers shown were “mop up” session for those who had previously missed training.</i>												
There was no specific feedback from Students. Induction training timetable is under review and this may impact on the CoE training delivered. Delivery of further Vulnerability training is due in Q3/4.												

Appendix A

Number	Indicator
L&D 3	<p><b>Other Code of Ethics Issues Training Input</b></p> <p><i>Rationale:</i> L&amp;D provides input on an ad-hoc basis to supplement training courses to implement national guidance or learning best practice from within Force. Where additional input has been made on Code of Ethics with courses within a quarter a text response will provide oversight into what has occurred and why so that ISB received an update on the wider Code of Ethics training and input made by Learning and Development within quarter.</p> <p><b>Analysis:</b> 13 Student Officers received ½ day input on Code of Ethics.  10 Inductees received a one hour Code of Ethics Input.</p>

PSD Indicators

FORCE INTEGRITY INDICATORS												
Number	Indicator	Number of Complaints Made Per Quarter					Number of Allegations Made per Quarter					
PSD 1	Number of registered complaints against Force excluding Action Fraud that relate to Police Code of Ethics	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total	
		12				12	13					13
		Number of Complaints Upheld Per Quarter					Number of Allegations Upheld Per Quarter					
		QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total	
		1				1	1					1
		Number of Upheld Complaints Relating to Integrity					Number of Upheld Allegations Relating to Integrity					
		QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total	
0				0	0					0		
<p><i>Rationale:</i> Monitoring the number of complaints and allegations will allow the Force to identify if there are specific trends that may require management action to address, this could identify the need to amend processes or Force culture depending on the nature of the complaints received. Each complaint made may have a number of associated allegations so monitoring this will allow the overall volume of work undertaken by PSD to be revealed.</p> <p><b>Historical Data:</b> 2014/15: 117 Complaints 2015/16: 105 Complaints 2016/17: 102 Complaints 2017/18: 90 Complaints 2018/19: 53 Complaints</p> <p><b>Analysis:</b> Complaints made are considered in relation to the standards of professional behaviour of which there is only one that relates to integrity. In this case the complaint that was upheld was not an integrity matter nor did it breach the standards of professional behaviour.</p>												
Number	Indicator	Number of Cases Per Quarter					Number of Cases Relating to Integrity					
PSD 2	Number of Civil cases which cite the Force (including Judicial Reviews) relating to Code of Ethics Issues	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total	
		5				5	0				0	
<p><i>Rationale:</i> Civil cases include Civil Claims, Judicial Reviews, Employee Liability, Liable and Slander, and Professional Indemnity. Claims represent a potential financial (even where there is insurance cover); and reputational risk, and outcomes can effect operational strategy and effectiveness.</p>												

Appendix A

	<b>Historical Data: 2014/15: 24 Cases 2015/16: 23 Cases 2016/17: 17 Cases 2017/18: 18 Cases 2018/19: 23 Cases</b>										
	<b>Analysis:</b> The standout theme of civil claims being made are around unlawful arrest, detention, and use of force (handcuffing). There are no outcomes on the claims reported as they can take several years to resolve. In the past learning has been identified for public order events which has been applied to Operation Benbow since and Extinction Rebellion recently, and is noted for potential public order events around Brexit.										
<b>Number</b>	<b>Indicator</b>					<b>Number of Cases Per quarter</b>					
<b>PSD 3</b>	<b>Cases of Abuse of Authority for Sexual Gain</b>					<b>QTR 1</b>	<b>QTR 2</b>	<b>QTR 3</b>	<b>QTR 4</b>	<b>Total</b>	
						<b>0</b>				<b>0</b>	
	<b>Rationale:</b> This is a serious integrity matter that is of concern at a national policing level. The reporting of this will provide perspective on whether or not the Force is being transparent with reporting and monitoring this issue and breach of public trust.										
<b>Analysis:</b> No cases have been reported.											
<b>Number</b>	<b>Indicator</b>	<b>Number of Misconduct Proceedings Per Quarter</b>					<b>Number of Misconduct Proceedings that relate to Honesty &amp; Integrity</b>				
<b>PSD 4</b>	<b>Misconduct Proceedings that relate to Code of Ethics Issues</b>	<b>QTR 1</b>	<b>QTR 2</b>	<b>QTR 3</b>	<b>QTR 4</b>	<b>Total</b>	<b>QTR 1</b>	<b>QTR 2</b>	<b>QTR 3</b>	<b>QTR 4</b>	<b>Total</b>
		<b>1</b>				<b>1</b>	<b>0</b>				<b>0</b>
	<b>Rationale:</b> Misconduct proceedings are a result of proven allegations or investigations by PSD into other areas of officer behaviour such as Gifts & Hospitality, Business Interests or Procurement. The number of misconduct hearings per quarter will be reported against the number relating to Police Code of Ethics.										
<b>Analysis:</b> The above was the result of an IOPC independent investigation and related to duties and responsibilities. It was found that there was no case to answer.											
<b>Number</b>	<b>Indicator</b>	<b>Number of Reports Per Quarter</b>					<b>Number of Reports that Result in a PSD Investigation</b>				
<b>PSD 5</b>	<b>Number of internal referrals to PSD (i.e. BadApple)</b>	<b>QTR 1</b>	<b>QTR 2</b>	<b>QTR 3</b>	<b>QTR 4</b>	<b>Total</b>	<b>QTR 1</b>	<b>QTR 2</b>	<b>QTR 3</b>	<b>QTR 4</b>	<b>Total</b>
		<b>5</b>				<b>5</b>	<b>4</b>				<b>4</b>
	<b>Rationale:</b> To capture the use of the Force internal systems and identify if staff feel confident in using the processes or if there are issues with their use and adoption in Force.										
<b>Analysis:</b> Detail about confidential reporting is not available although it has led to a number ongoing investigations being considered under conduct regulations.											

Page 27

**Corporate Communications Indicators**

FORCE INTEGRITY INDICATORS											
<b>Number</b>	<b>Indicator</b>	<b>Number of Media Contact Recorded within Quarter</b>					<b>Number Referred to PSD for notice</b>				
		<b>QTR 1</b>	<b>QTR 2</b>	<b>QTR 3</b>	<b>QTR 4</b>	<b>Total</b>	<b>QTR 1</b>	<b>QTR 2</b>	<b>QTR 3</b>	<b>QTR 4</b>	<b>Total</b>
<b>CC 1</b>	<b>Number of unauthorised media contacts referred to PSD</b>	<b>0</b>				<b>0</b>	<b>0</b>				<b>0</b>
<b>Rationale:</b> Corporate Communications are in a position to identify any unusual contact with the media by police officers and staff which could lead to compromise or corruption, or be unethical or unprofessional and may be reported to PSD for investigation or intelligence.											
<b>Analysis:</b> No media contract recorded and no referrals made to PSD in Q1.											

## Data Owners and Sources

No. 1	Indicator	Owner	Data Source
PC 1	Community Survey Question 4: If you were to have contact with the city of London Police they would act with Integrity.	Strategic Development	Strategic Development
PC 2	Victim Satisfaction Survey: Satisfaction with the way you were treated by the police officers and staff who dealt with you	PIU	PIU
HR 1	Number of Grievances registered with HR Relating to Code of Ethics Issues	HR	HR
HR 2	Number of Employment Tribunals that cite Code of Ethics Issues	HR	HR
HR 3	Number of Police Officer Leavers stating Code of Ethics Issues as a reason for leaving the organisation	HR	HR
	Number of Support Staff Leavers stating Integrity as a reason for leaving the organisation	HR	HR
HR 4	Number of Dismissals as a result of Code of Ethics Issues	HR	HR
L&D 1	Quarterly Random Drug Testing	L&D	L&D Monthly Dashboard
L&D 2	Code of Ethics Training Given as part of existing Courses	L&D	L&D Monthly Dashboard
L&D 3	Other Code of Ethics Issues Training Input	L&D	L&D Monthly Dashboard
PSD 1	Number of registered complaints against Force excluding Action Fraud that relate to Police Code of Ethics	PSD	PSD
PSD 2	Number of Civil cases which cite the Force (including Judicial Reviews) relating to Code of Ethics Issues	PSD	PSD
PSD 3	Cases of Abuse of Authority for Sexual Gain	PSD	PSD
PSD 4	Misconduct Proceedings that relate to Code of Ethics Issues	PSD	PSD
PSD 5	Number of BadApple Reports	PSD	PSD
CC1	Number of unauthorised media contacts referred to PSD	Corporate Communications	Corporate Communications

# **POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2019-20 September 2019 update**



## Suitable for Publication

### 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	Sep 19
1.1 Force has issued a statement committing to support and embed the Police Code of Ethics	GREEN	GREEN	GREEN
1.2 Maintain the Force Integrity Delivery Plan	GREEN	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	GREEN
1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas	GREEN	GREEN	GREEN
1.5 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes	GREEN	GREEN	GREEN
1.6 Maintain a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates)	GREEN	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	GREEN
1.8 Ensure training on standards, values and leadership ethics is available for all staff	GREEN	GREEN	GREEN
1.9 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures	GREEN	GREEN	GREEN

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

**PERFORMANCE REPORT**

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

## Suitable for Publication

**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	Sep 19	
<b>1.1</b> 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	GREEN	
<b>1.2</b> Maintain a Force Integrity Delivery Plan	Plan in existence since Nov 2016, updated quarterly	GREEN	GREEN	GREEN	
<b>1.3</b> 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 May 2019	GREEN	GREEN	GREEN	
<b>1.4</b> Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas	In existence and attend Integrity Standards Boards	GREEN	GREEN	GREEN	
<b>1.5</b> Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes	In existence, last outcomes published 17 <sup>th</sup> June 2019 (checked August 2019)	GREEN	GREEN	GREEN	
<b>1.6</b> Maintain a process to support the Force’s participation in the London Panel Challenge Forum (Ethics Associates)	Maintained, last meetings June 2019, next meetings in September 2019	GREEN	GREEN	GREEN	
<b>1.7</b> 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	GREEN	
<b>1.8</b> Ensure training on standards, values, leadership and ethics is available for all staff and included in all mandatory training	Information on standards, values and leadership is available to all staff on the intranet. All mandatory training courses incorporate the Code of Ethics, which is also part of induction.	GREEN	GREEN	GREEN	
<b>1.9</b> 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	GREEN	

## Suitable for Publication

1. Development Measures	
<b>MEASURE</b>	<b>2.1 1</b> Consider with Human Resources/Organisational Development taking part in the long term 'ethical drift' survey
<b>OWNER</b>	Head of Strategic Development / HR/ OD
<b>AIM/RATIONALE</b>	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.
<b>MEASUREMENT</b>	Head of Strategic Development to provide ISB with details of activities supporting this indicator
<b>DUE BY</b>	July 2019
<b>TRAFFIC LIGHT CRITERIA</b>	Green: participation agreed and rolled out Amber: Activity in train (within due time) but not delivered. Red: No activity and past due date
<b>TRAFFIC LIGHT</b>	<b>RED</b>
<b>CURRENT POSITION</b>	
<p><b>May 2019</b> - 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> <p><b>Aug 2019</b> update – no decision has yet been taken. HoSD to meet with Head of HR to progress before the next ISB (3<sup>rd</sup> September)</p>	

**Suitable for Publication**

1. Development Measures	
<b>MEASURE</b>	<b>2.2 Consider an internal board to advise on and review key decisions and processes</b>
<b>OWNER</b>	Head of Organisational Development
<b>AIM/RATIONALE</b>	This board would promote transparency and help to influence organisational behaviours.
<b>MEASUREMENT</b>	Existence of a board that produces useful information/advice to other boards/managers/policy developers.
<b>DUE BY</b>	July 2019
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Board established and meeting to a schedule; AMBER: Board established but meeting ad hoc; RED: Board not yet established
<b>TRAFFIC LIGHT</b>	<b>ACTION CLOSED</b>
<b>CURRENT POSITION</b>	
<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><b>May 2019</b> - This matter <b>CLOSED</b> 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.</p>	

## Suitable for Publication

2 Development Measures	
<b>MEASURE</b>	<b>2.3 Conduct an annual review of the Force integrity programme and implement identified improvements</b>
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	To ensure the Force continues to develop its approach to integrity and has plans to embed best practice.
<b>MEASUREMENT</b>	Review completed and reported to ISB
<b>DUE BY</b>	October 2019
<b>TRAFFIC LIGHT CRITERIA</b>	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.
<b>TRAFFIC LIGHT</b>	<b>WHITE</b>
<b>CURRENT POSITION</b>	
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.	

## Suitable for Publication

2 Development Measures	
<b>MEASURE</b>	<b>2.4</b> Arrange an independent peer review of organisational integrity arrangements
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	To assess the extent to which integrity related arrangements in force are sufficient and embedded, and inform development of this plan
<b>MEASUREMENT</b>	Review complete and action plan amended
<b>DUE BY</b>	September 2019
<b>TRAFFIC LIGHT CRITERIA</b>	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
<b>TRAFFIC LIGHT</b>	<b>AMBER</b>
<b>CURRENT POSITION</b>	
<p><b>May 2019</b> – Contact has been made with Bath Spa University, who will oversee the Peer Review, with the following agreed:            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 4<sup>th</sup> 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> <p><b>Aug 2019</b> – the May update remains current</p>	

**Suitable for Publication**

2 Development Measures	
<b>MEASURE</b>	<b>2.5 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assesment report when published</b>
<b>OWNER</b>	Head of Strategic Development (and any other relevant individual identified by the report)
<b>AIM/RATIONALE</b>	To ensure the Force actions best practice identified by HMICFRS.
<b>MEASUREMENT</b>	Progress reported to Performance Management Group and ISB
<b>DUE BY</b>	<b>March 2020</b>
<b>TRAFFIC LIGHT CRITERIA</b>	Green: AFI delivered; Amber: Action in progress to deliver AFI but not fully delivered; Red: AFI not delivered by due date
<b>TRAFFIC LIGHT</b>	<b>AMBER</b>
<b>CURRENT POSITION</b>	
<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><b>AFI 7 and 8 – the Force should review is external scrutiny of use of force and stop and search</b></p> <p><b>AFI 9 – the Force should extend its unconscious bias training to all its officers</b></p> <p><b>AFI 10 – The Force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up to date and include current data</b></p> <p><b>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.</b></p> <p><b>August update:</b> An action plan to address all the AFIs identified in the report has been drafted. A report has been submitted to the next Professional Standards and Integrity Committee (18<sup>th</sup> September) providing details of the Force’s response to these AFIs. This indicator will remain open until all actions have been delivered.</p>	

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