



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

**Date:** FRIDAY, 29 NOVEMBER 2019  
**Time:** 11.00 am  
**Venue:** COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

**Members:** Alderman Alison Gowman (Chairman)  
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  
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**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 18 September 2019.

**For Decision**  
(Pages 1 - 6)

4. **PUBLIC REFERENCES**

Joint Report of the Commissioner and Town Clerk.

**For Information**  
(Pages 7 - 8)

5. **POLICE AUTHORITY PROCESS FOR HANDLING THE COMPLAINTS APPEALS PROCESS**

Report of the Town Clerk.

**For Decision**  
(Pages 9 - 12)

6. **PUBLIC COMMITTEE REPORT CPS FILE FAILURES**

Report of the Commissioner.

**For Information**  
(Pages 13 - 16)

7. **FORCE RESPONSE TO HMICFRS REPORT: PEEL SPOTLIGHT REPORT, SHINING A LIGHT ON BETRAYAL (ABUSE OF POSITION FOR SEXUAL PURPOSE)**

Report of the Commissioner.

**For Information**  
(Pages 17 - 20)

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

Report of the Commissioner.

**For Information**  
(Pages 21 - 24)

a) **Integrity Dashboard 2019/20 Q2** (Pages 25 - 34)

- b) **Police Integrity Development and Delivery Plan Report 2019/20 November 2019 Update** (Pages 35 - 44)

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

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

11. **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**

12. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 18 September 2019.

**For Decision**  
(Pages 45 - 50)

- a) **Non-Public Matter Arising** (Pages 51 - 52)

To receive a written update regarding a matter arising from Item 15b (Summary of Cases – Assessed as not conduct or performance issue - CM/62/18).

13. **NON-PUBLIC REFERENCES**

Joint Report of the Town Clerk and Commissioner.

**For Information**  
(Pages 53 - 58)

- a) **Non-Public Reference 10** (Pages 59 - 60)

- b) **11/2019/P - Review of Speed Camera Activations** (Pages 61 - 62)

14. **EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES**

Report of the Comptroller and City Solicitor.

**For Information**  
(Pages 63 - 72)

15. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 2 – 1 JULY 2019 – 30 SEPTEMBER 2019**

Report of the Commissioner.

**For Information**  
(Pages 73 - 106)

16. **PROFESSIONAL STANDARDS DIRECTORATE - SUMMARY OF CASES**

Report of the Commissioner.

**For Information**  
(Pages 107 - 110)

- a) **Hearing/Meeting Held** (Pages 111 - 114)
- b) **Case to Answer/Upheld** (Pages 115 - 118)
- c) **No Case to Answer/Not Upheld** (Pages 119 - 126)
- d) **Local Resolution** (Pages 127 - 142)

17. **IOPC COMPLAINTS INFORMATION BULLETIN - 1 APRIL 2019 - 30 SEPTEMBER 2019**

Report of the Independent Office for Police Conduct.

**For Information**  
(Pages 143 - 156)

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

19. **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  
Wednesday, 18 September 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 Wednesday, 18 September 2019 at 10.30 am

**Present**

**Members:**

Alderman Alison Gowman (Chairman)  
Douglas Barrow (Ex-Officio Member)  
Alderman Emma Edhem  
Deputy James Thomson

**City of London Police Authority:**

Oliver Bolton	- Deputy Head of Police Authority Team
Alistair MacLellan	- Town Clerk's Department
Tarjinder Phull	- Comptroller and City Solicitor's Department

**City of London Police Force:**

Alistair Sutherland	- Assistant Commissioner
Angie Rogers	- Head of Professional Standards Directorate

**1. APOLOGIES**

Apologies were received from Caroline Addy, Nick Bensted-Smith, Tijs Broeke, Mia Campbell, Deborah Oliver and James Tumbridge.

The Chair welcomed Detective Superintendent Angie Rogers to her first meeting in her capacity as Head of the Professional Standards Directorate.

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

There were no declarations.

**3. MINUTES**

**RESOLVED**, that the public minutes and non-public summary of the meeting held on 3 June 2019 be approved as a correct record.

**4. PUBLIC REFERENCES**

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

**3/2018/P – Staff Survey**

- Members noted that the next survey would be conducted in January 2020 and agreed that this reference could be closed.

#### **4/2019/P – Chair to meet new Head of Professional Standards Directorate**

- The Chair noted that this reference could be closed.

#### **7/2019/P – Anti-Corruption story in City Matters**

- The Assistant Commissioner noted that the article had contained some inaccuracies. The Force had invited the editor to visit the Professional Standards Directorate. Members agreed that the reference could be closed.

#### **8/2019/P – Force Communications Plan – Stop and Search**

- The Assistant Commissioner agreed to circulate the relevant section of the plan ahead of the reference being closed.

#### **11/2019/P – Speeding Tickets**

- The Chair noted that the report emailed to Members on 6 June 2019 did not fully deal with the issue of allocation and cancellation of speeding tickets and requested that the matter be reviewed further ahead of the next meeting of the Committee.

#### **12/2019/P – Predictive Policing Methods**

- The Chair requested that this reference be retained for the time being.

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

#### **5. FORCE RESPONSE TO HMICFRS INTEGRATED PEEL ASSESSMENT (LEGITIMACY) FINDINGS 2018-19**

Members considered a report of the Commissioner regarding the Force response to HMICFRS Integrated PEEL Assessment (Legitimacy) Findings 2018/19 and the following points were made.

**Action for Further Improvement (AFI) 7 – the Force should ensure that effective external scrutiny takes place in relation to its use of force.**

- In response to a question regarding AFI 7, the Assistant Commissioner confirmed that the terms of reference of the newly constituted Community Scrutiny Group had been approved at its meeting on 4 September 2019.

**AFI 11 – the Force should ensure its counter-corruption unit has enough capability and capacity to counter corruption effectively and proactively.**

- The Assistant Commissioner noted that two additional posts had been funded from October 2019 and recruitment was underway internally within the Force.

- The Chair requested that the planned Skyline article regarding the Force's attitude towards corruption should be circulated more widely, and at least to Members of the Police Authority Board **(13/2019/P)**.

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

6. **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.

- The Head of Professional Standards agreed to provide future meeting dates of the London Police Challenge Forum **(14/2019/P)**.
- A Member recommended that the Force liaise with the Authority's Internal Communications Team to share best practice regarding the design and drafting of surveys **(15/2019/P)**.
- In response to a question, the Head of Professional Standards confirmed that Professional Standards had a single point of contact in each Force department.
- A Member noted that HR3 indicator (Number of leavers stating Code of Ethics as reason for leaving) would form part of wider reporting to the Performance and Resource Management Committee of the Police Authority Board.
- The Head of Professional Standards agreed to circulate an update to the Committee regarding the status of Development Measure 2.11 (Ethical Drift Survey) **(16/2019/P)**.

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

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

There were no questions.

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

There was no other business.

9. **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.

10. **EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES**  
*Members agreed to vary the order of items on the agenda so that Item 15 was considered next.*

Members considered a report of the Comptroller and City Solicitor regarding Employment Tribunal and Other Legal Cases.

11. **NON-PUBLIC MINUTES**  
**RESOLVED**, that the non-public minutes of the meeting held on 3 June 2019 be approved as a correct record.

12. **NON-PUBLIC REFERENCES**  
Members considered a report of the Town Clerk regarding non-public references.

13. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 1 – 1 APRIL 2019 – 30 JUNE 2019**  
Members considered a report of the Commissioner regarding Professional Standards Statistics – Quarter 1 – 1 April 2019 – 30 June 2019.

14. **IOPC POLICE COMPLAINTS INFORMATION BULLETIN Q1 - CITY OF LONDON - 1 APRIL 2019 - 30 JUNE 2019**  
Members considered the IOPC Police Complaints Information Bulletin Q1 – City of London – 1 April 2019 – 30 June 2019.

15. **SUMMARY OF CASES**  
Members considered a summary of cases.

15.1 **Assessed as conduct or performance issue - case to answer / upheld**

Members considered a report on cases assessed as conduct or performance issue – case to answer / upheld.

15.2 **Assessed as not conduct or performance issue - no case to answer / not upheld**

Members considered a report on cases assessed as not conduct or performance issue – no case to answer / not upheld.

15.3 **Local Resolution**

Members considered a report on cases dealt with via local resolution.

16. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**  
There were no non-public questions.

17. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**  
There were four items of other business.



**The meeting ended at 12.22 pm**

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Chairman

**Contact Officer: Alistair MacLellan / [alistair.maclellan@cityoflondon.gov.uk](mailto:alistair.maclellan@cityoflondon.gov.uk)**

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PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE  
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**PUBLIC OUTSTANDING REFERENCES**

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.	Assistant Commissioner	A verbal update will be given at November 2019 meeting. Further work has been requested on our external website.
11/2019/P	3 June 2019 Item 10 – Questions	Report on Speeding tickets to be circulated to PSI Committee by email	Head of Professional Standards	Please see note at Item 13(b) in the non-public papers.
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	Head of Professional Standards	We are linked in nationally with the evolving ethical framework that is being developed dedicated to the issues relating to digital / data policing. This work is being led by the MPS and the first working group will be meeting on 6 December 2019 at NSY.
13/2019/P	18 September 2019 Item 5 – Force Response to HMICFRS Integrated PEEL Assessment	Planned Skyline article regarding the Force's attitude towards corruption should be circulated more widely, and at least to Members of the Police Authority Board.	Head of Professional Standards	Further communication is planned in Skyline and our external facing website. This is currently work in progress – owned by DCI Cresswell.
14/2019/P	18 September 2019 Item 6 – Integrity Dashboard and	Future meeting dates of London Police Challenge Forum to be provided to the Committee.	Head of Strategic Development	<b>IN PROGRESS</b> Members advised by email on 1 November 2019 at 3.19pm regarding 10 December 2019 meeting. Dates for 2020 yet to be set and will be circulated in due course.

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	Code of Ethics Update			
15/2019/P	18 September 2019 Item 6 – Integrity Dashboard and Code of Ethics Update	Force to consider liaising with Authority Internal Communications Team regarding best practice design and drafting of surveys.	Head of Professional Standards	I have confirmed that the relevant liaison is taking place.
16/2019/P	18 September 2019 Item 6 – Integrity Dashboard and Code of Ethics Update	Update to be circulated to Committee regarding status of Development Measure 2.11 (Ethical Drift Survey).	Head of Professional Standards	<b>IN PROGRESS</b> No progress to report – to be discussed at November 2019 meeting.

<b>Committee:</b>	<b>Dated:</b>
Professional Standards & Integrity (Police) Committee	29 <sup>th</sup> November 2019
<b>Subject:</b> Police Authority process for handling the Complaints Appeals Process	<b>Public</b>
<b>Report of:</b> Town Clerk	<b>For Decision</b>
<b>Report author:</b> Oliver Bolton, Police Authority, Town Clerk's	

## Summary

This report outlines the process by which police complaint reviews (appeals) will be handled by the Police Authority under the new regulations due to come into effect in February 2020. Members are asked to consider a number of options for their involvement in the process of determining the outcome of the reviews.

## Recommendation

Members are asked to:

- Consider the proposed options in this report and agree on their preferred one.

## Main Report

### Background

1. Following the Chapman Review in December 2014, the Home Office launched a consultation: *Improving Police Integrity*. This led to proposals to simplify and improve the police complaints process with provisions included in the Police and Crime Bill in February 2016 – which gained Royal Assent in January 2017.
2. The Home Office has assured Local Policing Bodies that the Regulations that will confirm the detail of the legislation, will be laid in Parliament over Christmas, allowing for implementation of the new process on 1<sup>st</sup> February 2020. It should be noted that this commitment was made before the most recent extension to the Brexit deadline. However, the Authority is still working on the assumption that the Regulations will be laid over Christmas, as promised.

### Current Position

3. The aim of the changes in the Act is to deliver a system that is:
  - a) More customer focused and that resolves complaints in a timely fashion;
  - b) Less bureaucratic;
  - c) More transparent and independent with effective local oversight;

- d) Allows for identification of patterns and trends of dissatisfaction being raised; and
  - e) Less adversarial for officers.
4. In line with most force areas, we are only taking on the mandatory changes of the legislation and not the options which would entail taking on more of the whole complaints process from the force. These options are outlined in the previous paper to this committee (5<sup>th</sup> March 2018).
  5. One key point to note is that 'Appeals' are referred to as 'Reviews' under the new legislation.
  6. The schematic attached at Annex A shows the process that the Authority is putting in place to handle the reviews as they are received. Much of the process is prescribed and based directly upon the available draft statutory guidance from the Independent Office of Police Conduct (IOPC).
  7. However, due to the difference between the structure and constitution of the Police of Authority and areas headed by a Police and Crime Commissioner, there remain some decisions for members to make on how they would like the Review Panel to function. Options are outlined below.
  8. A recent recruitment campaign has also been successful in appointing a new Compliance Lead who will be the lead officer on complaints for the Police Authority Team.

## Options

### Delegated authority for determination

9. The legislation allows the responsibility for determining reviews to be delegated by the local policing body to anyone as long as they are not a constable, another local policing body, or such person whose involvement could reasonably give rise to accusations of concern that they could act with impartiality. In the City, the function could be delegated to an individual, such as the Chair of this Committee, to the Committee as a whole, or to a sub-set of the Committee (a 'Review Panel').
10. **Option 1:** Authority for determination is delegated to the Chairman of the PS&I Committee. This would allow for swift determination although goes against the grain of collective responsibility that underpins the City of London Corporation approach to Member responsibility/accountability.
11. **Option 2:** The whole Committee is delegated with the responsibility. Given the need to turn around determinations more frequently than the Committee meets, this is unlikely to be a practical solution.
12. **Option 3:** The recommended option is to establish a Review Panel comprising the Chairman and two other members of the Committee. The two other members could be on a rota, so that all members of the committee share the responsibility, with each member sitting for three-month period (i.e. three consecutive panels). The rota could be staggered so that only one member of the panel changes at a time.

13. With regards to option 3, members should consider whether the Chairman is delegated the authority to make a determination, in consultation with the wider panel, or whether the authority is delegated to the panel as a whole, and so must be whole/quorate to make a decision. If the latter, it is suggested a substitute member would need to be 'on call' to allow for any late unavailability of the selected panel.
14. Given the need to determine the reviews "as soon as reasonably practicable", it is suggested that a series of monthly panel meetings is scheduled in the diary which would then be attended by whichever members are proposed out of the options above. The meetings would not be open to the public.

### **Proposals**

15. Training for officers of OPCCs and Authorities is being run by the IOPC in late January 2020. If Members believe it would be helpful, the Police Authority Team will look to commission a bespoke session for Members early next year.

### **Conclusion**

16. Preparations are well underway for the move to the new regulations. Members need to give a steer as to how they want to configure their role in the process. Option 3 (establishing a Review Panel) is recommended to Members.

### **Appendices**

- Annex A – outline schematic of the proposed Police Authority handling of complaint reviews.

### **Background Papers**

Report submitted to the Professional Standards and Integrity Sub (Police) Committee on 5<sup>th</sup> March 2018, which outlined the key legislative changes and the rationale behind them.

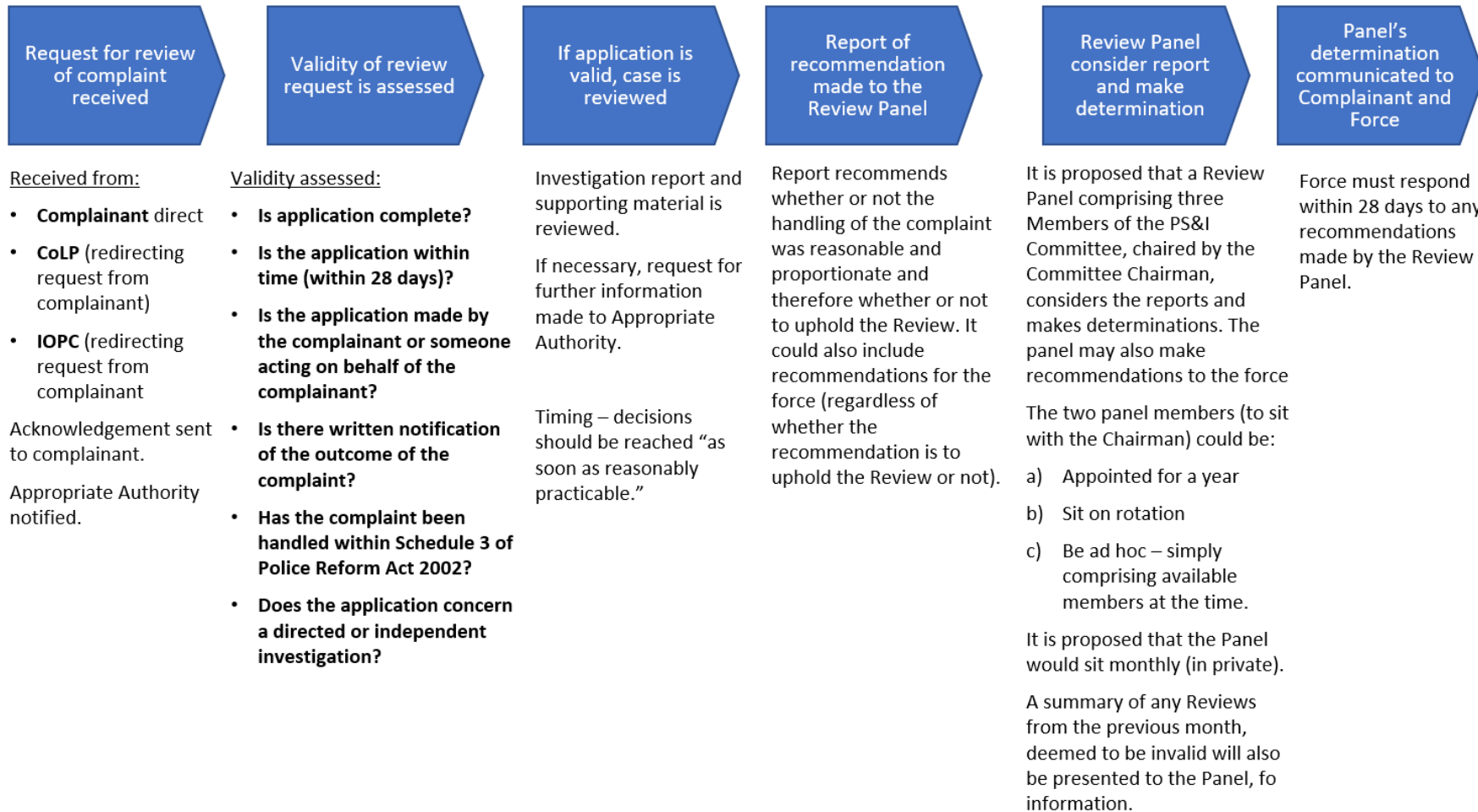
### **Oliver Bolton**

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## ANNEX A - Proposed process for Police Authority handling of police complaint reviews (appeals)





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<b>Committee(s):</b> Professional Standards and Integrity Sub Committee	<b>Date(s):</b> 29 November 2019
<b>Subject:</b> Public Committee Report CPS File Failures	<b>Public</b>
<b>Report of:</b> Commissioner of Police	<b>For Information</b>
<b>Report author:</b> DCI Matt Mountford	

### Summary

In late 2018, the City of London Police (CoLP) identified that a number of case files were not meeting the required standards set by Crown Prosecution Service (CPS). These 'CPS file failures' were unacceptably high and were resulting in cases being abandoned before reaching court. The CPS has a strict regime for compliance and a majority of the file failures were due to poor case file preparation, including sub-par compliance by individual officers and their supervisors.

In January 2019 the CoLP Crime Standards Board (CSB) was created to enhance the standards of investigations and to introduce measures to improve compliance with guidance, process and policy. Criminal Investigations covers a broad area of policing, and as such certain elements of the investigative journey have now been compartmentalised into guidance to allow for a thorough understanding and consistent approach by all officers and staff.

This report will provide an overview of the CPS file failings and will outline the measures that have been put in place to remedy/reduce the failures.

### Main Report

#### Background

1	In autumn 2018 the CoLP Administration of Justice (AoJ) department became aware that a significant number of CoLP case files were being rejected and discontinued by the CPS. The reason for these file failures were predominantly issues surrounding process and procedure whereby officers/staff had not complied with the strict guidance in place for progression of case files to court.
2	The CPS has a rigorous acceptance criteria and can fail a file if a particular requirement isn't followed exactly as described. These parameters

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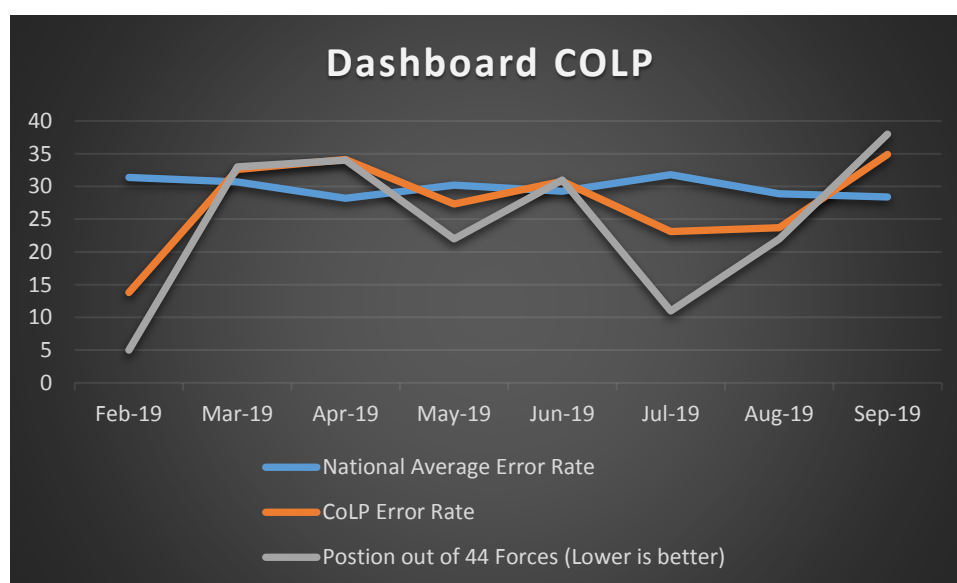
	<p>sometimes do not take into context the wider operational challenges that are in play on a daily basis. This has led to the withdrawal of cases for a matter that could have been remedied with some minor contact with the officer in case (OIC). It is recognised however that the CoLP has fallen short on a number of cases which have resulted in file failures occurring when they really needn't have.</p>
3	<p>In January 2019 the Inaugural CSB sat with Commander Gyford as Chair. The Terms of Reference (ToR) include the following Statement of Purpose:</p> <p><i>'To provide strategic oversight and direction for all aspects of crime investigation performance. This includes, but is not limited to: quality of investigations, crime supervision, identification of risk, victim care and satisfaction, offender management, crime data integrity, Niche/NCRS compliance, case file quality, outcomes and the monitoring and governance of an overarching Crime Standards Action Plan to deliver'</i></p>
4	<p>A part of the ambition of the CSB is to improve the overall quality of investigations, including case file quality and supervisory oversight which plays an essential role in the timeliness and quality of file submissions.</p>
5	<p>In autumn 2018 a Disclosure Gold Group, and subsequently a Disclosure Working Group, were formed as part of the force's response the National Disclosure Improvement Plan. Since then City of London Police have been working closely with the Metropolitan Police and the CPS on a joint action plan. The internal disclosure group feeds into other forums around the force, including learning and development.</p>
6	<p>From September 2018, the Crime Directorate began reviewing the case files that had been failed by the CPS to examine the reasons for the failures and to introduce organisational learning to improve standards and the quality of file submissions, and give direct feedback to officers and implement service recovery. This process involves a detailed analysis of the file submission, and while this has been resource and time intensive, it is a valuable mechanism to extract the exact reasons why cases have failed.</p>
7	<p>The Crime Directorate have supplied a Detective Sergeant to act as Evidence Review Officer within the Uniform Policing Directorate (UPD). This officer has allowed for a consistent gatekeeping and quality assurance process to be implemented, with real time expert advice and feedback provided to officers at the time of file submission. This officer was drawn from the numbers in the crime directorate and not as an additional member of staff for a trial period.</p>
8	<p>To date, over 90 CPS file failures have been reviewed by the Crime Directorate. Administration of Justice also regularly review and QA files that are submitted. There are numerous, reoccurring reasons for failures. Often, more than one reason will be stated as a reason for the failure.</p>
9	<p>Having reviewed the failures and noting the reasons behind them, a detailed overview is provided every month which is fed back to the officer who</p>

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	completed the file, their line manager(s) and Learning and Development. The reviewing officer (DS Yiannaki) has also conducted 1:1 meetings with the officers to outline their file failures and ensure appropriate measures and development are in place to avoid future mistakes and improve performance.
10	Repeat failures are to be met with senior management intervention, and then, if necessary a performance action plan for improvement. Line supervisors are also being held responsible for their role in the chain of submission.
11	The Crime Standards Board also has sight of the CPS file failure monthly report to ensure all areas of the business are kept apprised. This has informed Learning & Development who have designed bespoke training sessions to address the most common mistakes made. L&D are running a 3 sessions on Crime Standards in mid-November, borne directly from this theme.
12	It is important to note that the reviewing officer has not agreed with all of the CPS reasons and rationale for failure. 18 of the cases assessed by the CoLP were deemed to be incorrectly failed by the CPS. This included cases where the CoLP had sent evidence to the CPS who had then lost/mislaid the material – and subsequently failed the case. These disagreements have been fed back to the CPS via the Administration of Justice representative, who meets with the CPS regularly to point out these challenges.

**Current Position**

- 13 1. Early in 2018 CoLP CPS case file failures were unacceptably high. Good progress has been made with monthly performance available from February 2019 indicating an average failure rate broadly in line with the national average, although September has shown particularly poor performance with the CoLP slipping down the table. October's figures are due.



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14	As is often the case with City of London Police statistical reporting, small numbers can often highlight extreme percentage changes, both positive and negative. To provide some context, the eligible files for September 2019 for the Metropolitan Police were 2050, of which 41.7% failed (854). This equates to 0.05% change (+/-) per file failure.
15	The eligible files for inclusion for the CoLP were 43, of which 34.9% failed (15). Therefore just one file failure for CoLP equates to a 2.3% change (+/-). Had we experienced 4 less failures (reducing our failure to just 25.7%) we would have been sitting at better than the national average, and in 25 <sup>th</sup> position.
<b>Conclusion</b>	
16	Since January 2019, the CoLP have proactively introduced measures to improve file standards and push performance in the right direction, with less cases failing overall. There has been an alignment to the national average, keeping within just a few percentage points of the average trend, month on month.
17	Clearly CoLP want to achieve better than just average, and the measures in place will continue to reinforce learning and practice across the force, reducing further the amount of failures that arise.

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<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Date(s):</b> 29 <sup>th</sup> November 2019
<b>Subject:</b> Force response to HMICFRS report: PEEL spotlight report, Shining a light on betrayal (Abuse of position for sexual purpose)	<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

This is a national report that focuses on one aspect of the PEEL Legitimacy criteria, abuse of position for sexual purposes. Published on 27<sup>th</sup> September 2019, it looks at the progress forces have made tackling this issue following previous reports on the subject dating back to 2015.

This paper finds that from a prevention perspective, forces have good ethical cultures, with leaders setting high standards. Conversely, HMICFRS are concerned at the numbers of people working in forces that do not appear to have been appropriately vetted. HMICFRS also feel that the threat is not properly understood by forces, with many recording corruption intelligence incorrectly. This is linked to forces' inability to monitor their staffs' use of ICT systems.

The capacity and capability of forces' counter corruption units (CCU) also remains an issue for many forces. HMICFRS assess that of the 43 forces, 32 do not have sufficient staffing levels. Benchmarking shows that in forces will fewer than 2000 officers and staff, CCUs had between 5 and 8 staff.

The report makes the following recommendations:

R1 – All forces that are not yet doing so should immediately comply with all elements of the national guidance on vetting. (The Force complies with this and is therefore GREEN in this area).

R2 and R3 – (for the NPCC Lead)

R4 – By April 2020 all forces that have not yet done so should:

- Record corruption using national categories
- Produce a comprehensive annual counter corruption strategic threat assessment

- Establish regular links between their CCUs and those agencies that work with and support vulnerable people.

R5 – By April 2020 all forces that not yet done so should make sure they have enough people with the right skills to look proactively for intelligence about those abusing their position for a sexual purpose, and to successfully complete their investigations into those identified.

Recommendations 4 and 5 effectively duplicate the areas for further improvement (AFIs) that were given to the Force as part of the last legitimacy inspection and which were reported to your last Committee.

## **Recommendation**

Members are asked to note the report.

## **Main Report**

### **Background**

1. On the 27<sup>th</sup> September 2019, Her Majesty’s Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) published a national PEEL ‘spotlight’ report titled “Shining a light on betrayal” focussing on abuse of position for sexual purposes. Specifically, it assesses progress forces have made in tackling the issue since its previous 2 reports, published in 2015 and 2017.
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**

3. HMICFRS note encouraging progress made and an improved understanding of the problem across the whole of the policing and cite examples of forces being proactive and creative in looking for signs of corruption. This has included good engagement with external agencies who receive feedback from those they support about the behaviour of officers and staff.
4. However, they also found that in many forces progress has been much slower, with inadequate investment in the necessary resources to be proactive in looking for corruption.

#### *Prevention*

5. Overall, HMICFRS note forces have good ethical cultures. They are now generally good at creating an ethical environment where the abuse of position for a sexual purpose is recognised as police corruption and totally unacceptable. They go on to

say that leaders set and reinforce clear standards and create an organisational culture that encourages ethical and lawful behaviour. This includes challenging inappropriate behaviour, openly discussing dilemmas, learning from mistakes and encouraging continual improvement. Adopting this approach helps safeguard the public, reduces the risk of the workforce behaving unacceptably and helps promote public trust and confidence.

6. However, they note a concern that many people are working in policing across the country that have not been appropriately vetted. This finding led directly to their first recommendation (see paragraph 12 below). City of London Police is already compliant in this area and therefore this is assessed as GREEN.

#### *Understanding the threat*

7. HMICFRS found too many forces are recording corruption intelligence incorrectly. Not doing so means many forces do not have a complete picture of the extent of the threat they face.

#### *Uncovering corruption*

8. Another area of concern noted by HMICFRS is the number of forces who are currently unable to monitor how their staff use information and communication technologies (ICT). This was a finding in the Force Legitimacy report, and is therefore being addressed through the procurement of new software that ensures the Force can meet this expectation.
9. Whilst some forces are good at working with external agencies to identify the warning signs of inappropriate behaviour, others are not doing enough to develop effective links with these agencies. This is an area the Force has made considerable progress in (as reported to your last Committee meeting), especially those organisations that deal with vulnerable people.

#### *Taking action*

10. Many forces still don't have enough capacity in their counter-corruption units. HMICFRS assess that of the 43 forces, 32 do not have sufficient staffing levels. Benchmarking shows that in forces will fewer than 2000 officers and staff, CCUs had between 5 and 8 staff. Forces need enough dedicated resources to proactively look for warning signs and develop intelligence. Many forces still don't have enough capacity in their CCUs. Those who uncover the most cases are generally those who proactively look for this type of corruption and aren't necessarily the forces with the greatest problems. Members will be aware that this has been an issue for City of London Police for some time, and efforts are ongoing to recruit to 2 vacant positions which were approved as part of the uplift for 67 additional officers. When up to strength, and with the software referred to in paragraph 8, the Force will be in a stronger position with regard to proactively targeting corruption.
11. HMICFRS notes the importance of victims feeling supported throughout any investigation, including abuse of position for a sexual purpose. This is something that the City of London Police would always strive to do.

*HMICFRS Recommendations*

12. The report makes 5 recommendations:

R1 – All forces that are not yet doing so should immediately comply with all elements of the national guidance on vetting. As previously noted, the Force complies with this and is therefore GREEN in this area.

R2 and R3 are specifically for the National Police Chief Council Lead to deliver

R4 – By April 2020 all forces that have not yet done so should:

- Record corruption using national categories
- Produce a comprehensive annual counter corruption strategic threat assessment
- Establish regular links between their CCUs and those agencies that work with and support vulnerable people.

R5 – By April 2020 all forces that not yet done so should make sure they have enough people with the right skills to look proactively for intelligence about those abusing their position for a sexual purpose, and to successfully complete their investigations into those identified.

13. Recommendations 4 and 5 effectively duplicate the areas for further improvement (AFIs) that were given to the City of London Police as part of the last legitimacy inspection and which were reported to your last Committee. They are also included in the Integrity Development Plan submitted to your Committee for information.

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# Agenda Item 8

<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Date:</b> 29 <sup>th</sup> November 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 Force's Integrity Standards Board (ISB) met on 21<sup>st</sup> November 2019, 2 days after the Town Clerk's deadline for papers for your Committee, therefore a verbal update of the meeting will be given to your Committee. The appendices to this paper (the Dashboard and the Integrity Development Plan) are therefore included as drafts as they had not been considered by the ISB prior to submission to your Committee.

### *Code of Ethics Update:*

Since the last ISB 2 London Police Challenge Forum (LCPF) events have taken place; the event on the 13<sup>th</sup> September, hosted by CoLP was chaired by the Detective Chief Superintendent Crime.

On the 4<sup>th</sup> October 2019, the Force underwent an integrity peer review, the results of which are awaited and which once received will form the basis for the next iteration of the Integrity Development Plan.

Both the regional and national Ethics panels met in early October – the principal subject of discussion was the development of a Data/Digital Ethical Framework to address concerns over the issues being raised by emerging technologies. An event at the MPS, to which the City of London Police has been invited, is being held on 6<sup>th</sup> December to formally launch a working group.

The Integrity Standards Development Plan is also included for information. It includes an indicator to track progress against the action plan to address areas for further improvement identified in the Integrated PEEL Assessment published on 2<sup>nd</sup> May 2019.

## 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 last board (21<sup>st</sup> November 2019) met 2 days following the Town Clerk's deadline for submission of papers, therefore it has not been possible to include a summary within this report. A verbal update will be provided at your Committee.
5. It follows that the Dashboard (Appendix A to this report) had not been considered by the ISB when this paper was submitted, it is therefore presented as a draft for information.

#### *Code of Ethics Update*

6. Since your last Committee 2 London Police Challenge Forum (LCPF) events have taken place; 4 were planned, but the events scheduled to be hosted by the Metropolitan Police Service (MPS) for mid-October had to be cancelled due to operational commitments associated with policing Extinction Rebellion and preparations for the (then) anticipated impact of Brexit. The event on the 13<sup>th</sup> September, hosted by the City of London Police went ahead and was chaired by the Detective Chief Superintendent Crime Directorate.
7. The remaining scheduled LCPF events for 2019 are:
  - a. 6<sup>th</sup> December 2019 hosted by MPS/National Counter Terrorism Police HQ
  - b. 10<sup>th</sup> December 2019 **hosted by CoLP** (changed from the 5<sup>th</sup> December, and with Assistant Commissioner Basu in attendance for some of the event).

Dates for the 2020 panels have not yet been set.

8. On the 4<sup>th</sup> October 2019, the Force underwent an integrity peer review conducted by a Chief Superintendent from Devon and Cornwall Police and a Professor of Ethics and Criminology from Bath Spa University. The review involved an assessment of Force documents (ToR and minutes from the ISB, and Integrity Development Plan) and 4 focus groups (ethics associates, police officers, police staff and senior officers/staff). A report is being prepared, once received it will be considered by the Force and will form the basis of the annual ethics review for the next iteration of the Integrity Development Plan.
9. The MPS are setting up an internal board to be called the “Ethical Issues Steering Committee” to consider ethical issues and their impact of the MPS and its subsequent response. The board will be chaired by DAC Matt Horne. The Head of Strategic Development has been invited as the City of London Police lead for the LPCF, and will attend with a view to sharing best practice. The first meeting is due to take place in February 2020.

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

10. The last Regional Police Ethics Network was held on the 8<sup>th</sup> October 2019. The meeting, which welcomed the ACC South West Crime Unit as a new member, covered 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. The LPCF event on the 6<sup>th</sup> December at New Scotland Yard is being used by this group to formally launch their work in this area, representatives from City of London Police have been invited.
  - b. The ‘Knowledge Hub’, which was being trialled by Devon & Cornwall and Kent (in lieu of POLKA<sup>1</sup>), is now being rolled out across all forces and is hoped will be more effective than POLKA proved to be.
  - c. There was some discussion about forming a specialist panel of officers/staff that are vetted to ‘Developed Vetting’ level so that some subjects (such as counter terrorism tactics) can be discussed more freely. This will be explored in more detail.
  - d. The Regional Conference has been deferred to 29<sup>th</sup> April 2020 and will be primarily concerned with ethical leadership and organisational learning.

11. The next meeting is scheduled for the 15<sup>th</sup> January 2020.

### ***UK Police Ethics Guidance Group***

12. The last UK Police Ethics Guidance Group (UKPEGG) was held on Friday 11<sup>th</sup> October 2019. The main topic under consideration was the evolving Data/Digital Ethics Framework (the subject of the event being held at the MPS

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<sup>1</sup> Police On-Line Knowledge Area

on 6<sup>th</sup> December 2019) and a recognition that the subject is so wide ranging that it merits a separate agenda and event.

13. Members were asked to consider whether the recruitment of the 20,000 additional officers is likely to raise any specific ethical issues.

14. The next UKPEGG will take place on 31<sup>st</sup> January 2020.

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

15. 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'.

16. The development section contains those areas that the Force has introduced for 2019/20.

17. 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 on this subject was submitted to your last Committee.

18. The sole red area relates to the Force potentially taking part in the long term survey designed to measure ethical drift. It has been agreed in Force that City of London Police would like to take part in the survey and contact has now been made with those organising the survey to establish (a) whether the option to join is still current, and (b) the logistics of participation. As the survey is on-line, there is no financial implication to taking part. Pending the responses to (a) and (b) above, however, this will remain red.

### **Appendices**

- Appendix A – Integrity Dashboard Quarter 2
- Appendix B – Integrity Standards Development Plan (November 2019 update)

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**APPENDIX A**

**CITY OF LONDON POLICE**

**INTEGRITY  
DASHBOARD 2019/20  
Quarter 2  
Version 1.0**



## APPENDIX A

### 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.

## APPENDIX A

### 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 - The following information has been supplied by Paul Adams (Strategic Development):</b></p> <p>The Street Survey for 2019 has been finalised and will be undertaken by the survey company during November 2019 for an interim report to be produced in December 2019. ISB will receive the update on the survey results as part of the report into Quarter 3 dashboard performance. The 2019 results will be compared to the 2018 data presented above to identify if there has been any significant shift in public opinion about the Force. This will first be presented to PMG to inform on Measure 11 within the Force Plan, ISB will not receive an assessment until PMG have been given the opportunity to evaluate and discuss results as this may inform the information presented within this dashboard. This will be compared against the results of the previous years survey.</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></p> <p>At time of report writing PIU have not analysed the victim data collated so far within 2019 due to resourcing issues. This data informs the Force report against Policing Plan priorities and will be provided for oversight into the ISB dashboard once analysis has been completed within Force.</p>							

## APPENDIX A

### 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	8			12	1	2			2
<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 - The following information has been supplied by Robert Dimmick (Head of HR):</b></p> <p>8 new Grievances were submitted in Q2 Five of which would be related to the Code of Ethics (1 x Confidentiality; 2 x Honesty &amp; Integrity, 1 x Equality and Diversity and 1 x Authority, respect and courtesy/conduct). At this stage two of the grievances was partially upheld.</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			0	2	0			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></p> <p>Update from the ETs reported in Q1. Both ETs related to Sex discrimination therefore came under Equality and diversity code of conduct. One of the cases was an ET appeal. In the ET case the Force was successful in defending one element but lost the second element however, the tribunal did not award the claimant any compensatory payment. In the ET Appeal Case The Force lost its Appeal however, we are appealing the judgement to the Court of Appeals.</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	16			34	1	1			2
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	20			32	1	1			2
<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></p> <p>8 police officers completed exit interviews. 1 officer stated breach of Equality &amp; Diversity / Conduct as the reason for leaving.</p> <p>9 police staff completed exit interviews. 1 member of Police Staff stated breach of Equality &amp; Diversity provisions.</p>											
Number	Indicator	Number of dismissals per quarter									



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HR 4	Number of Dismissals as a result of Code of Ethics Issues	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	1			1
<p><b>Rationale:</b> 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.</p>						
<p><b>Analysis:</b> The dismissal reported in Q2 will be discussed in more detail in the closed segment of the meeting.</p>						

## APPENDIX A

### Learning & Development Indicators

FORCE INTEGRITY INDICATORS											
Number	Indicator	# Disclosure Courses Undertaken within Quarter					Total Number of Officers Trained in Disclosure				
L&D 1	Mandatory Code of Ethics Training Given as part of existing Courses	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		3	0			3	36	0			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			2	10	5			15
		# 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	25			34	84	144			228		
<p><b>Rationale:</b> 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.</p> <p><b>Analysis:</b>            No disclosure courses were due in Q2. Those delegates requiring face to face training have received the required training. Further training is being given in Q3 as Continuing Professional Development to the Scientific Support Unit and Roads Policing Unit. 619 Officers have completed the NCALT package “Disclosure and relevancy – Conducting fair investigations.”             “Priority 1” officers have received Stop Search training. The list of Priority 2 &amp; 3 delegates is being reviewed/updated and further training will commence once candidates are identified.             A new package is being rolled out to first responders.</p>											
Number	Indicator										
L&D 2	Other Code of Ethics Issues Training Input										
<p><b>Rationale:</b> 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> 20 City of London Police inductees have received induction training which includes a 1 hour input from PSD focusing on Code of Ethics</p>											

## APPENDIX A

### 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	18			30	13	18			31
		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	0			1	1	0			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	0			0
<p><b>Rationale:</b> 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> It should be noted that PSD uses IOPC categories for recording allegations which do not necessarily relate to the Code of Ethics. These figure represent the total number of complaint and allegation made in a quarter. The top three category of allegations are Incivility, impoliteness and intolerance; other irregularity in procedure; and other neglect or failure in duty.</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	3			8	0	0			0
<p><b>Rationale:</b> 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> <p><b>Historical Data:</b> 2014/15: 24 Cases 2015/16: 23 Cases 2016/17: 17 Cases 2017/18: 18 Cases 2018/19: 23 Cases</p> <p><b>Analysis:</b> The claims do no necessary relate to Code of Conduct issues but represent the total number of new claims recorded in the quarter (excluding employment claims). Claims vary from claim for damage to property to unlawful arrest and detention. Most claims new claims will be pre-action rather than issued proceedings.</p>											
Number	Indicator	Number of Cases Per quarter									
PSD 3	Cases of Abuse of Authority for Sexual Gain	QTR 1	QTR 2	QTR 3	QTR 4	Total					
		0	0			0					
<p><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.</p> <p><b>Analysis:</b> No cases have been reported.</p>											

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Number	Indicator	Number of Misconduct Proceedings Per Quarter					Number of Misconduct Proceedings that relate to Honesty & Integrity				
PSD 4	Misconduct Proceedings that relate to Code of Ethics Issues	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		1	0			1	0	0			0
	<p><i>Rationale:</i> Misconduct proceedings are a result of proven allegations or investigations by PSD into other areas of officer behaviour such as Gifts &amp; Hospitality, Business Interests or Procurement. The number of misconduct hearings per quarter will be reported against the number relating to Police Code of Ethics.</p> <p><i>Analysis</i> - There have been no misconduct proceedings during quarter 2.</p>										
Number	Indicator	Number of Reports Per Quarter					Number of Reports that Result in a PSD Investigation				
PSD 5	Number of internal referrals to PSD (i.e. BadApple)	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		5	6			11	5	6			11
	<p><i>Rationale:</i> 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.</p> <p><i>Analysis</i> : For reasons of confidentiality PSD is unable to comment on the nature of the referrals other than to say they have led to CCU investigations.</p>										
Number	Indicator	Number of Random Tests Per Quarter					Number of Positive Tests Per Quarter				
PSD 6	Quarterly Random Drug Testing	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0			0	0	0			0
	<p><i>Rationale:</i> 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.</p> <p><b>Historical Data:</b> 2016/17: 0 Positive Tests 2017/18: 0 Positive Tests 2018/19: 0 Positive Tests</p> <p><i>Analysis</i> -: No random drug testing took place during quarter 2.</p>										

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### Corporate Communications Indicators

FORCE INTEGRITY INDICATORS											
Number	Indicator	Number of Media Contact Recorded within Quarter					Number Referred to PSD for notice				
CC 1	Number of unauthorised media contacts referred to PSD	QTR 1	QTR 2	QTR 3	QTR 4	Total	QTR 1	QTR 2	QTR 3	QTR 4	Total
		0	0			0	0	0			0
	<p><i>Rationale:</i> 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.</p> <p><i>Analysis</i> - No referrals have been made for quarter 2.</p>										

## APPENDIX A

### 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	Code of Ethics Training Given as part of existing Courses	L&D	L&D Monthly Dashboard
L&D 2	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
PSD 6	Quarterly Random Drug Testing	PSD	PSD
CC1	Number of unauthorised media contacts referred to PSD	Corporate Communications	Corporate Communications

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## **Appendix B**

# **POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2019-20 November 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	Nov 19
1.1 Force has issued a statement committing to support and embed the Police Code of Ethics	GREEN	GREEN	GREEN	GREEN
1.2 Maintain the Force Integrity Delivery Plan	GREEN	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	GREEN
1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas	GREEN	GREEN	GREEN	GREEN
1.5 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes	GREEN	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	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	GREEN
1.8 Ensure training on standards, values and leadership ethics is available for all staff	GREEN	GREEN	GREEN	GREEN
1.9 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures	GREEN	GREEN	GREEN	GREEN

2. Development Measures	Traffic Light Tracker			
	Mar 19	May 19	Sep 19	Nov 19
2.1 Consider with HR/OD taking part in the long term 'ethical drift' survey	WHITE	AMBER	RED	RED
2.2 Consider an internal board to advise on and review key decisions and processes	WHITE	CLOSED	CLOSED	CLOSED
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	WHITE	WHITE	WHITE	WHITE
2.4 Arrange an independent peer review of organisational integrity arrangements	WHITE	AMBER	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	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 (Nov 2019)	Mar 19	May 19	Sep 19	Nov 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	GREEN
<b>1.2</b> Maintain a Force Integrity Delivery Plan	Plan in existence since Nov 2016, updated quarterly	GREEN	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	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	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 November 2019)	GREEN	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 September 2019, next meetings in December 2019	GREEN	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	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	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	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> <p><b>Nov 2019</b> update – The Transform programme is doing some work on organisational culture and it is felt this study would complement that work. The HR representative on that programme has agreed to be the link for this work and contact has now been made with the Regional Police Ethics Network expressing our interest in taking part in this study. Pending the outcome of that request, and arrangements being made locally for ongoing participation, this action will remain red until those things are in place.</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>	

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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>	
<p>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.</p> <p><b>Nov 19 update:</b> The peer review took place on October 4<sup>th</sup> 2019. The Force awaits the results of the review, which will form the basis of the annual review.</p>	

## 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 following receipt of the report
<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> <p><b>Nov 2019 update</b> – the peer review took place on 4<sup>th</sup> October 2019, however, as the results have not yet been received by the force and no changes have been made to the action plan as a result, this indicator remains AMBER as per the traffic light criteria.</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 Assessment 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: All AFIs delivered; Amber: Action in progress to deliver AFIs 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> <p><b>November update:</b> AFIs 7 and 8 are AMBER. Both areas will be scrutinised by the PAB at its November meeting through the Use of Force (part of the Custody update) and stop and search update. A revised group now exists. Training of members of the group is ongoing, with a first meeting to assess data scheduled for February 2020.</p> <p>AFI 9 is AMBER – training those officers not already trained commences in November 2019</p> <p>AFI 10 is AMBER – these documents were reviewed for 2018/19 but are now being re-evaluated for 2019/20. Once compliance with the requirement has been established, this will be GREEN.</p> <p>AFI 11 is AMBER – The Force is still trying to recruit to vacant approved posts to address this AFI and a capital bid has been prepared for the necessary software to comply with AFI 11(2) above.</p>	

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