

Committee(s):	Date:
Professional Standards and Integrity Sub Committee	7 th December 2018
Subject: Integrity Dashboard and Code of Ethics Update	Public
Report of: Commissioner of the City of London Police	For Information
Report author: Stuart Phoenix, Head of Strategic Development	

Summary

Integrity Standards Board and Dashboard:

The dashboard appended to this report (Appendix A) was considered by the Force's Integrity Standards Board (ISB) on 22nd November 2018, this board was also attended by HMICFRS as part of their programme of Force insight visits which are used to inform the Integrated PEEL Inspection which the Force will receive week commencing 3rd December. It was highlighted at this meeting that the number of cases for each indicator remained at low levels. This was consistent with previous years.

It was highlighted that both PSD and HR had not identified any integrity issues from the existing cases to raise for ISB to note. The indicators were discussed by the group and there were no issues identified with the data presented.

ISB were provided with an update on the work being undertaken to develop an revised Integrity Dashboard containing a wider suite of indicators from across the Force. Strategic Development are working closely with PSD to provide indicators to give greater context on integrity so that the ISB can review the indicators from a number of areas and assess integrity verses volume and other outcomes. At this stage the indicators require workshopping with owners to identify data sources and the context to be provided and Strategic Development undertook to provide ISB with the working dashboard for oversight at the next scheduled ISB meeting which will take place early 2019.

Code of Ethics Update:

Two meetings of the London Police Challenge Forum (LPCF) have taken place since your last Sub Committee; one on the 30th October 2018 hosted by the British Transport Police (BTP) in Camden and one on 1st November 2018 hosted by the Metropolitan Police Service (MPS) at Charing Cross. Draft notes have been produced, however, they have not yet been through MPS internal screening processes and are not yet in the public domain. The next LPCF event will be on the 13th December at New Scotland Yard and will include a number of chief officer inputs (including the national lead for Integrity, the Chief Constable of Gwent). City of London Police chief officers have agreed to provide videos of chief officers talking about difficult decisions they have faced and how they approached them.

The National Counter Terrorism HQ has now joined the LPCF as a fourth member.

The Force's intranet pages dedicated to the LPCF and how to become an Ethics Associate have been refreshed. The first tranche of 'guidance notes' on ethical dilemmas discussed has now been published on the intranet.

The Head of Strategic Development (HoSD) attended the most recent regional meeting of the Police Ethics Network (PEN) on 11th October 2018 hosted by Bath Spa University, followed by the first national meeting of the UK Police Ethics Guidance Group on the 12th October, chaired by Chief Constable Julian Williams. Representatives from the Home Office, Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services (HMICFRS), the Police Federation and the College of Policing attended.

The Integrity Standards Development Plan is also included for information. There is one action currently shown as RED relating to a proposal to set up an internal board, for which there is not universal agreement. No consensus has been reached during the previous quarter therefore direction is being sought from ISB as to whether the action should be closed or a formal proposal made to the Force's Strategic Management Board for determination. The Development Plan is now being reviewed so that a revised plan can be presented to the next ISB and Professional Standards and Integrity Sub Committee.

Recommendation(s)

Members are asked to note the report.

Main Report

Background

1. Integrity is a key principle of the Police Code of Ethics, published in July 2014. Recognising this, the Force developed an integrity dashboard that brought together a series of indicators across a broad range of activities associated with integrity. The dashboard indicates the extent to which the Force's workforce acts with integrity. It is attached for Members' information at Appendix A.
2. To complement the dashboard and ensure there is a programme of ongoing activities to embed the Police Code of Ethics, the Force developed an Integrity Development plan, which is attached for Members' information at Appendix B.

Current Position

Integrity Standards Board and Dashboard

3. An Integrity Standards Board (ISB) was constituted to monitor the dashboard on a quarterly basis and to consider other issues relating to integrity. The Board is chaired by the Assistant Commissioner and is attended by the Chairman of your Sub Committee and a representative from the Town Clerk's department. The most recent board was held on 22nd November 2018.

4. At that meeting it was highlighted that the number of cases for each indicator remained at historic low levels and that upon submission of the dashboard data neither HR or PSD had identified any Integrity issues from the cases being investigated. The group were invited to discuss the dashboard in more detail and a number of indicators were reviewed.
5. Indicator 6: Number of monitoring exercises around irregular use/transitions involving Corporate credit cards. This reported as 2 investigations for the quarter and like with a number of other indicators the group felt that there could be further context provided here through listing the number of overall transactions to put the number of investigations into a wider context with card use. This was something that was accepted as required for the Dashboard refresh which is currently being progressed.
6. Indicator 7 was also discussed about the use of Force and complaints resulting from its use. There had been no complaints listed for this indicator for the period and ISB discussed the wording of the indicator for future reference. It was defined that there was no one definition for use of Force in complaints with several categories being used nationally to pick up a number of police activities. This indicator would be reviewed in the new Dashboard to pick this up so it would better reflect the data collected by PSD.
7. Indicator 16, this listed the number of results for testing with cause drug testing which was 0 for the quarter. It was highlighted that the random testing figures were not included within this indicator but were being reviewed for inclusion in the new Dashboard format to show wider context of testing with the quarterly programme run by Learning and Development.
8. ISB were provided with an update on the work being undertaken to develop the Integrity Dashboard so that a wider suite of indicators could be included for future review. It was confirmed that a draft had been produced with Strategic Development working in tandem with PSD to identify a number of areas for potential inclusion within the draft. Indicators now needed to be workshopped with owners so that clear context could be provided for reference at future ISB meetings. It was agreed that a working draft would be presented for oversight at the next ISB.

Code of Ethics Update

9. The last two scheduled meetings of the London Police Challenge Forum (LPCF) took place on the 30th October hosted by British Transport Police (BTP) at Camden, and the 1st November 2018 hosted by the MPS at Charing Cross. The ethical issues covered at each meeting were the same and included use of spit guards, Freemasonry and the police and drug taking at music festivals. All of the dilemmas have been considered by previous panels, therefore this was seen as a validation exercise of previous findings.
10. The result of previous panels are now being published, the first tranche were published on the Force's intranet on the 29th October 2018 and will be added

to as the documents become available. There is still no national mechanism for sharing these outside of individual police forces, with each force currently having to publish them on their own websites. A solution for this remains on the national agenda.

11. The next LPCF event takes place on 13th December 2018 at New Scotland Yard. It is being used as an opportunity to take stock of what has been achieved and develop more direct input from senior officers. DAC Martin (MPS) is scheduled to open the event. CoLP will be formally represented by the Commander Ops and Head of Strategic Planning, although there are a number of places available for City Ethics Associates to also attend. A session has been reserved for CoLP to showcase a number of videos of chief officers talking about difficult decisions they have faced during their careers, the options available to them and what they ended up doing. The Chief Constable of Gwent will lead a session on a proposed Appropriate Relationships at Work Policy, whilst another session will be led by a former Director of a high profile construction company focusing on decision making in that organisation prior to its collapse. The event will be closed by ACC Adrian Hanstock (BTP).
12. CoLP has refreshed its LPCF and Ethics Associates intranet pages, with improved details of how individuals can apply to become Ethics Associates or submit an ethical dilemma. With the exception of details about respective force contacts, the wording used is consistent across the 4 LPCF forces, which now includes the National Counter Terrorism HQ.

Regional Police Ethics Network and UK Police Ethics Guidance Group

13. The Head of Strategic Development attended the most recent meeting of the Regional Police Ethics Network (RPEN) hosted by Bath Spa University on 11th October 2018. The morning session followed the usual format of each organisation providing an update of their most recent activities. The 4 LPCF organisations meet quarterly with representatives from 22 other Policing and Non-Policing organisations in that geographic region and the RPEN has been instrumental in assisting with the establishment of the 3 other regions across the UK. Two items were discussed which were of particular interest to the Force:
 - a. Taking part in a long term survey that is designed to measure ethical drift (basically a set of questions will be asked of the same person as they apply to join a police force, following their probation and then after 3 to 5 years' service); and
 - b. The use of weighted filter questions designed to explore an individual's ethical stance on a number of issues, at the recruitment stage. Devon and Cornwall reported that they asked these questions of individuals following their initial application being successful. The result was that they did not proceed with 1 in 4 applicants based on their responses to the questions asked. They view this as a long term investment in filtering out undesirable candidates.

Both of the above areas will be explored further and will feature in Force's Integrity Standards Development Plan, which is being reviewed and will be submitted to the next ISB for consideration.

14. The afternoon session of the RPEN was the Region's Annual Conference, with guest speakers discussing ethics in an operational environment. Presentations were given by a Superintendent, a Royal Marines Colonel, a Deputy Chief Constable and a retired Commander for the MPS. This was complemented by a short presentation from a University Professor regarding a new ethical theory being developed.
15. The first full United Kingdom level Police Ethics Committee was held the following day (Friday 12th), also at Bath Spa University. The United Kingdom Police Ethics Guidance Group (UKPEGG) is co-chaired by NPCC Lead for the Police Code of Ethics - Chief Constable Julian Williams (Gwent Police) and Professor Allyson MacVean of Bath Spa University. Numerous UK level organisations were represented at this meeting, including the Home Office, HMICFRS, the Police Federation, Superintendents' Association and the College of Policing.

Integrity Standards Development Plan

16. The Integrity Standards Development Plan remains in two sections covering 'commitment' actions and 'development' actions. The commitment section is intended to ensure that the Force maintains the basic structures to support integrity in the workplace. As these were implemented last year, whilst they are being maintained they will be reflected as 'GREEN'.
17. Of the five new areas contained within the plan, one remains RED, as detailed below.
 - i. Launch an internal board to advise on and review key decisions and processes. This is to support a finding of the Staff Survey around perceived organisational unfairness relating to strategic decisions. Discussions around implementing this proposal have been led by the Chief Superintendent of Intelligence and Information Directorate. The proposal has not been universally supported, with some asserting current mechanisms in place (e.g. prompts on strategic board templates to consider Code of Ethics implications on proposals or decisions requested) are sufficient, and there are other avenues where individuals can challenge decisions. It could also be viewed as increasing bureaucracy given the existing mechanisms, which includes the LPCF in place. Given there is now an action plan to address issues highlighted by the Staff Survey, ISB members are asked to consider whether this action should be closed with no further action, or request a paper to be submitted to SMB for determination.
18. Direction on the above issue was sought at ISB and it was determined that the culture audit being undertaken by Organisational Development would be expanded to cover ethics to inform the future direction of this indicator. This

would then establish if a separate board was required or if the existing arrangements were sufficient as well as exploring the potential to place Ethics oversight on the agenda of an existing meeting such as the Force organisation Development Forum.

Crime audits

19. The Force Crime and Incident Registrar (FCIR) conducts regular audits of Force compliance with Home Office Counting Rules (HOCR) and the National Crime and Incident Recording Standard (NCRS). Forces (note, not the City of London Police) have been criticised in the past for unethical crime recording and associated practices. Whilst the audits are primarily concerned with compliance, the FCIR also looks to see where results indicate unethical practices or circumstances that might be interpreted as unethical.
20. The audit reports are submitted to the Victim Code and Crime Working Group for oversight and action. The FCIR reports verbally to the Integrity Standards Board whether any of the audits reveal ethical or integrity-related issues. If such issues are identified, a written report is made.

Appendices

- Appendix A – Integrity Dashboard (considered by the Integrity Standards Board 22nd November 2018)
- Appendix B – Integrity Standards Development Plan (considered by the Integrity Standards Board 22nd November 2018)

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