

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

Summary

Integrity Standards Board and Dashboard:

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

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

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

Code of Ethics Update:

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

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

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

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

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

Recommendation(s)

Members are asked to note the report.

Main Report

Background

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

Current Position

Integrity Standards Board and Dashboard

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

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

Code of Ethics Update

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

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

Regional Police Ethics Network and UK Police Ethics Guidance Group

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

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

Integrity Standards Development Plan

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

Crime audits

- 19. The Force Crime and Incident Registrar (FCIR) conducts regular audits of Force compliance with Home Office Counting Rules (HOCR) and the National Crime and Incident Recording Standard (NCRS). Forces (note, not the City of London Police) have been criticised in the past for unethical crime recording and associated practices. Whilst the audits are primarily concerned with compliance, the FCIR also looks to see where results indicate unethical practices or circumstances that might be interpreted as unethical.

20. The audit reports are submitted to the Victim Code and Crime Working Group for oversight and action. The FCIR reports verbally to the Integrity Standards Board whether any of the audits reveal ethical or integrity-related issues. If such issues are identified, a written report is made.

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

Appendices

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

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