

Integrity Re-inspection 2012 - Force Feedback

Force: City of London Police

Date of Inspection: 10/11 July 2012

Overview – Progress since the last inspection

Since 2011 the Force has developed an Integrity Action Plan with ownership by the Assistant Commissioner and reviewed at the management board meetings.

The previous gifts and hospitality registers have now been consolidated into a single register, owned by the head of PSD. The recently approved ACPO guidance for gifts and hospitality, media and secondary employment is being implemented as policy across the Force and all staff have been made aware through different 'broadcasts' via email and intranet.

The Force completes checks in relation to information disclosure, media messages and leaks. It also completes routine checks and audits of gifts and hospitality and corporate cards and expenses spends. In addition, the Force has reviewed all departments' allocations of corporate cards although this has not seen a noticeable drop in numbers.

Since the last review PSD has conducted an organisation-wide threat assessment and developed a PSD strategic threat assessment. This is currently being reviewed by the Force Management Team and will go to the Corporation for review. The Counter Corruption Unit (CCU) resource levels remain the same as last year, with access to covert resources provided by MOUs with South Eastern Region. There are no plans to change these resourcing levels.

Workstream Specific Feedback -

1. Governance and Oversight

- All Policies with the PIR element that have been subject to ACPO review have had changes made to them. All have been renewed and re-circulated out to staff via intranet 'broadcast' and email.
- PSD has a monthly meeting with the Assistant Commissioner (AC); this is by way of a set agenda and covers: all audits, media contact, corruption, top 10 expenses and overtime earners, mobile phone reports and corporate card spend. PSD also has exception

meetings with the AC outside this when required.

- The Corporation Committee is intrusive and challenges cases and decisions made by PSD at the quarterly meeting. PSD prepares a quarterly report to the Committee prior to the meeting. This report covers all cases including Police Staff and the Committee is also provided with all IPCC statistics.
- City of London Police (CoLP) has produced an 'Action Plan' based on the *Without Fear or Favour* self-assessment questionnaire; this is owned by AC Armstrong and is reviewed at the Force Management Team meetings. It assigns an action owner and red, amber, or green status to each of the self-assessment questions.
- PSD refers to the IPCC when required and has done so on recent investigations. The Head of PSD speaks weekly with the IPCC representative and they have a good relationship. There is a formal meeting every two months to discuss investigations and PSD issues.

2. Relationships with the media and others

- Staff were clear that any contact with the media had to go via the Communications Department. Reminders are sent out to staff surrounding high profile cases that may have particular media interest in CoLP. A brief will go out about the incident then a statement informing all staff to send any queries to the Communications Department.
- The Force has adopted the ACPO media advisory document and has recently recruited a new head of corporate communications.
- The Communications Department logs and keeps a central register of all media interaction. This register is kept on software called 'Vuelio' and was set up in October. 'Vuelio' has been enhanced by the recent head of communications so the Force can run reports by subject, staff member or date. There are six licenses for individuals within the Communications Department and the Force is in the process of applying for more to cover the Force Control Room inspectors for out of hours use. At present they enter information retrospectively, or if of a serious nature will contact media on call.
- The software 'Vuelio' logs all contact with the media and this has the ability to have reports printed off and examined. These reports are sent to PSD which will pass onto the AC if relevant.
- The City of London Police has had cases involving relationships with private investigators and these have been dealt with proactively. PSD liaises with surrounding forces and shares intelligence on those staff who have left the police and are starting their own PI business. It proactively monitors these individuals and any relationships with serving staff.
- PSD acknowledges that 'other relationships' is a particular area of risk within the City of London. This is due to the contacts and networks made between serving officers and city companies. There is a lot of cross over with many ex-officers now working for private city companies.

3. Information disclosure

- Posters have been circulated reminding staff of guidance regarding Facebook and Twitter. Guidance has been circulated via the intranet and via emails from PSD. Probationers are given training surrounding social media by PSD and staff are unable to access social media from work IT.
- The Communications Department uses 'HOOT SUITE' software to monitor all social media coverage. It also monitors all media coverage daily and anything it is unhappy with, or that has not been recorded onto the register, it passes to PSD. It also produces a monthly report of all media contact for PSD.
- Staff are aware of policies and are notifying PSD when they come across inappropriate use of social media by other staff members. An example of a female officer who had been in a fight off duty and then placed photos onto Facebook was given. This is being dealt with by PSD.
- Staff are clear about policies of information disclosure and data protection. There have been recent cases regarding information disclosure with staff being dismissed. This prompted another reminder to go out to all staff about the data protection obligations and the consequences.
- 'Barracuda' software provides an active monitoring tool for internet access, however it provides limited information for reactive investigation of breaches, this is to be superseded with WebMarshal.
- Lessons from integrity issues are fed into the organisational learning forum and then fed back Force wide.

4. Gifts and Hospitality

- Staff confirmed that there had been a change of Gifts & Hospitality policy. Guidance and policy is available to all staff on the intranet 'sharepoint' web page and is easily accessible. All staff were aware that any G&H had to be authorised prior to acceptance.
- All G&H should be recorded onto the IT Sharepoint central register but the recording of declined gifts and hospitality is not mandated. Senior officers view high numbers of offers to attend corporate events 'as part of the job' but would always decline if it was felt to be inappropriate, for example G&H from a contractor. PSD refers to the AC for rulings on specific offers.
- The Committee took the view that hospitality is normal in the city. It is satisfied that both it and the Force are proportionate in their approach. It would be expected that the Commissioner of the City of London Police would respond favourably to an invitation from a key stakeholder if invited out for dinner. Although the invitations must be proportionate, relevant and justified.
- The Corporation checks the Gifts and Hospitality register and expects it to be updated regularly and it is published on the Force website. However, the register does not capture declined offers and there was an absence of understanding within the Corporation as to why this would be considered important.

5. Procurement and contracts

- Staff were aware that new procedures have been issued surrounding the use of corporate cards. They can no longer be used to buy gifts, i.e. welfare or thank you gifts.
- The Force does not complete additional vetting of staff who are issued with cards and it was apparent that the process to obtain one was relaxed. There has not been any profiling of units that would need them or the limits that should be placed on individual cards. Many card holders had credit limits which they had never, and were unlikely to ever, reach.
- In a Force of approximately 1,210 staff there are currently 378 cards issued (approximately 31% of the Force) and comment was made several times that having a card was seen as a 'status symbol' or 'as a part of the job'.
- There has been a recent review of all cards, with some holders returning them. Staff had noticed a more stringent scrutiny of spends and use over the last year. If staff fail to reconcile statements monthly then their details are sent to the AC and the card will be cancelled.
- There is no formal training but when a card is sent to a member of staff they are sent a link to the Standard Operating Procedures and links on the IT system to give guidance on how to use them. Staff have to sign a corporate form which sets out their obligations with regards to use of the card.
- Limited training is given to those delegated with authority for procurement. There is a sole member of staff designated to procurement however his role is to give advice as opposed to provide oversight.
- Finance has oversight of all departmental budgets, therefore monitors all procurement made and had a recent review of all contracts. It compiles reports which go to PSD and then to the AC if trends or activity are suspicious. It also completes the top 10 earners and card 'spenders' for PSD each month.

6. Additional employment

- Staff are all aware that they have to declare business interests and secondary employment. Reminders about the policy have been sent out over the last year.
- PSD confirmed that there was an amnesty last September and this revealed 50 members of staff with other business interests. Some have been refused while others are under investigation since coming to light after the amnesty. This amnesty raised the awareness of all staff.
- PSD keeps the register of all authorised and refused applications updated on the Centurion IT system.
- PSD reviews every application when its 12 month renewal comes up and sends out reminders to supervisors to clarify if there are any issues about continuing the authority.
- The amnesty raised awareness and this caused other staff members to report against staff who they believed had not declared an interest.
- A 'Broadcast' went out to all staff and supervisors reminding them of their obligations and giving guidance. Supervisors are

responsible for letting PSD know on the renewal or first application about anything that may cause concern, for example, sickness or other absences.

7. Proactivity

- The Force CCU exists within PSD but it is small and has a lack of resilience. Proactivity is a challenge and the Force is scoping collaboration opportunities. PSD has a MOU with the southeast region.
- There is a confidential reporting line via 'Safecall', however due to lack of use staff were asked whether the Force should keep it. PSD gave good examples of its use leading to investigations but there were mixed reviews on whether it was confidential or not. Officers said that Safecall would refer your call onto PSD which would then know your details.
- CoLP does not undertake drug testing. This is a difficult issue as all police staff are employees of the corporation not CoLP and the Corporation will not agree to it at this point. CoLP is looking at introducing testing for police officers.
- CoLP deals proactively with outsourced workers and contractors and all are thoroughly vetted. There was a recent case regarding inappropriate disclosure of information and this contracted member of staff was dealt with by PSD in liaison with the company and PSD is looking at data protection offences. PSD completes proactive auditing of systems and the Counter Corruption Unit has capability to live monitor several 'risk' IT systems. It integrity tests on an intelligence led basis. The Force use 'secret shoppers' to undertake quality assurance testing.
- PSD has risk assessed departments and ensures vetting is appropriate to each area. It oversees all vetting and ensures it is renewed.
- PSD completes examinations of mobile phone bills and this has led to a £3,000 reduction in spend over the last year.
- Since the last review PSD has conducted an organisation-wide strategic threat assessment and this will feed into both the Force and SOCA strategic assessments.