

Committee(s): Professional Standards and Integrity Committee of the Police Authority Board.	Date(s): 3 rd June 2019
Subject: HMICFRS Integrated PEEL Assessment 2018-19	Public
Report of: Commissioner of Police	For Information
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Summary

In May 2019, Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) published its report on the integrated PEEL (Police Efficiency, Effectiveness and Legitimacy) Assessment.

This paper presents is a high-level summary of the Legitimacy aspect of the report, which is relevant to the work of the Professional Standards and Integrity Committee.

The Force was assessed overall as follows:

Effectiveness	GOOD
Efficiency	GOOD
Legitimacy	REQUIRES IMPROVEMENT

A fuller report that covers Effectiveness and Efficiency, together with proposed actions to address the areas for improvement will be submitted to the Police Performance and Resource Management Sub Committee at its June 2019 meeting as part of the regular HMICFRS Update.

Recommendation

Members are asked to

- 1) Note the report

Main Report

Background

1. In 2018/19, HMICFRS adopted an integrated PEEL assessment (IPA) approach to its existing PEEL (police effectiveness, efficiency and legitimacy) inspections. IPA combines into a single inspection the effectiveness, efficiency

and legitimacy areas of PEEL. These areas had previously been inspected separately each year.

2. As well as HMICFRS inspection findings, their assessment is informed by their analysis of:
 - force data and management statements;
 - risks to the public;
 - progress since previous inspections;
 - findings from our non-PEEL inspections;
 - how forces tackle serious and organised crime locally and regionally; and
 - our regular monitoring work.

HMICFRS inspected all forces in four areas:

- protecting vulnerable people;
- firearms capability;
- planning for the future; and
- ethical and lawful workforce behaviour.

Current Position

3. For the Legitimacy aspect of the inspection, the Force has been assessed as follows:

Legitimacy	Overall: Requires improvement	Last inspected
Fair treatment of the public	Requires improvement	2018/19
Ethical and lawful workforce behaviour	Requires improvement	2018/19
Fair treatment of the workforce	Good	2017/18

4. HMICFRS Matt Parr commented that whilst HMICFRS are satisfied by most aspects of City of London Police's performance, the Force needs to make improvements in its legitimacy to provide a consistently good service.
5. It is noted the Force continues to uphold an ethical culture and promote standards of professional behaviour well. But the Force has more to do to assure itself that it has the capacity and capability to root out corruption. Also, the Force should make sure it has the necessary systems in place to reassure the public that it carries out stop and searches legitimately.
6. Specifically in relation to Legitimacy, the report identifies the following strengths and weaknesses:

- ✓ Leaders understand and values the benefits of community engagement.
- ✓ There is a positive culture around ethics and decision making
- ✓ Supervision of Stop and Search has vastly improved
- ✓ All members of workforce have received lowest level of vetting clearance for role.

- ✗ A major problem is a lack of external scrutiny.
- ✗ Whilst supervision and monitoring of stop and search has improved, more can be done to analyse use of these powers.
- ✗ Policy on body worn video does not state that officer should start recording at the beginning of a stop and search.
- ✗ Not all of workforce have received training in unconscious bias
- ✗ Whilst dataset on use of force has improved does not monitor use of force by individual officers including reviewing CCTV and BWV material (recent Custody inspection report makes more detailed reference).
- ✗ Needs to improve quality and content of anti-corruption assessment and control strategy
- ✗ Needs to improve the capacity and capability of its anti-corruption unit both level of establishment and ability to monitor IT systems
- ✗ Does not use organisation information (email accounts and logs from crime reports) to identify those who are at risk of corruption
- ✗ Not yet addressed previous recommendation to form links with agencies that support victims to seek information about officers abusing their position for a sexual purpose.
- ✗ Should provide guidance and briefings to all workforce re Abuse of Position not just new officers and supervisors.

7. For the Legitimacy pillar HMICFRS identified 5 AFIs:

AFI 7

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

AFI 8

The Force should ensure that effective external scrutiny takes place in relation to its stop and search powers.

AFI 9

The Force should extend its unconscious bias training to all its workforce.

AFI 10

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

AFI 11

The Force should ensure that its counter-corruption unit:

- Has enough capability and capacity to counter corruption effectively and proactively.

- Can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the force's data and identify computer misuse.
- Builds effective relationships with individuals and organisations that support and work with vulnerable people.

Conclusion

8. Whilst the Force is encouraged by the overall inspection results, it recognises there is work to do to address the identified areas for improvement. These are currently being A detailed update will be submitted to the Performance and Resource Management Sub Committee at its June 2019 meeting as part of the regular HMICFRS update.

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