

<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Date(s):</b> 18 <sup>th</sup> September 2019
<b>Subject:</b> Force response to HMICFRS Integrated PEEL Assessment (Legitimacy) Findings2018-19	<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

At your Committee's meeting on 3<sup>rd</sup> June 2019, the City of London Police reported the findings of Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) on the Legitimacy aspect of its integrated PEEL (Police Efficiency, Effectiveness and Legitimacy) Assessment.

This paper presents is a summary of the Force's response to those findings to provide 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:

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.

Adverse comments not forming part of an AFI:

- Policy on body worn video does not state that officers should start recording at the beginning of a stop and search.
- Whilst dataset on use of force has improved, it does not monitor use of force by individual officers including reviewing CCTV and BWV material
- Should provide guidance and briefings to all workforce re Abuse of Position not just new officers and supervisors

### **Recommendation**

Members are asked to note the report.

## **Main Report**

### **Background**

1. At your Committee's meeting on 3<sup>rd</sup> June 2019, the City of London Police reported the findings of Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) on the Legitimacy aspect of its integrated PEEL (Police Efficiency, Effectiveness and Legitimacy) Assessment.
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**

### **Formal Areas for Further Improvement (AFIs)**

**AFI 7 - The Force should ensure that effective external scrutiny takes place in relation to its use of force.**

3. This AFI and AFI 8 immediately below, has been addressed by a newly constituted Community Scrutiny Group that is being overseen by the Superintendent Communities in Uniform Policing. Considerable efforts have been made to attract new members to this group and an introductory day took place on the 11<sup>th</sup> June 2019. The recruitment campaign resulted in 12 people being put forward for vetting to enable them to take part in the forum. Draft terms of reference for the group have been produced and will be considered by the group at their first meeting (which will be a joint meeting with the Independent Advisory Group) on September 4<sup>th</sup>.
4. The group will initially consider Stop and Search and Use of Force, but feedback will also be sought as to the groups' views regarding other force practices. Future meetings will be scheduled by the group when they meet on the 4<sup>th</sup> September.

**AFI 8 - The Force should ensure that effective external scrutiny takes place in relation to its stop and search powers**

5. See response for AFI 7 immediately above.

**AFI 9 - The Force should extend its unconscious bias training to all its workforce**

6. HMICFRS recognised that most but not all the workforce receive unconscious bias training. The May 2019 force Training Improvement Board considered this issue and approved the delivery of unconscious training via an e-learning package. This is now mandatory training for the whole workforce. Monitoring will take place in autumn 2019.

**AFI 10 - The Force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up to date and include current data**

7. The Counter Corruption Strategy has been reviewed and revised to address the issues highlighted in the AFI. It has been signed off by the (then) Head of Professional Standards Unit (now Head of Crime) and the Assistant Commissioner. Due to its nature, it is not published.

**AFI 11 - The Force should ensure that its counter-corruption unit:**

- **Has enough capability and capacity to counter corruption effectively and proactively.**
8. This was an area that was cited as critical by the Chief Officer Team in making their case for an uplift in funding to provide additional officers and staff for the Force. As a direct result of that request, 2 additional posts are currently being advertised. Together with collaborative work with the British Transport Police in this area, this uplift will provide the necessary capacity and capability 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.**
9. An appropriate software system that can be utilised within the Counter Corruption Unit to support its audit capability has been identified, it is currently being used by 22 other forces so has a proven track record. The system has not yet been procured and the delay in implementation has now been escalated as a formal risk.
- **Builds effective relationships with individuals and organisations that support and work with vulnerable people.**
10. Professional Standards (PSD) have commenced a series of community engagement exercises, in conjunction with established community policing

activities to promote and make PSD more accessible. This includes organisations that support and work with vulnerable people. Ongoing attendance will reinforce acceptable and non-acceptable standards of behaviours and avenues for reporting any form of abuse or matters of concern. To date this has included attendance at:

- a) Community Surgery at Salvation Army at their HQ on Upper Thames Street.
  - b) Annual Community Meeting at Guildhall with many agencies present to offer advice to the community. This meeting was held at lunch time with another in the evening to enable the Corporation to update its residents.
  - c) Community Meeting at Bart's Hospital.
11. New safeguarding arrangements in the City of London and Hackney are being developed, which will provide further opportunities to raise awareness by PSD going forward. Consideration is also being given to publishing an article in Skyline (external community engagement vehicle) to raise awareness of the force's attitude towards corruption / abuse of position, supporting vulnerable people and how individuals can report concerns.
12. PSD will also better exploit existing avenues that exist and which have a role in supporting the vulnerable, including:
- a) Working with the Force Vulnerable Victim Advocate for them to raise awareness on behalf of PSD with agencies they engage with;
  - b) Working with the Head of Community Safety to establish relationship and work with them to raise awareness around abuse of position; and
  - c) Working with Force Vulnerability Strand Leads to promote avenues of reporting with 3<sup>rd</sup> party groups they work with in particular areas.

### **HMICFRS observations on additional improvements**

#### **Policy on body worn video does not state that officers should start recording at the beginning of a stop and search.**

13. A Body Worn Video Super User Group has been established with overall ownership and management sitting within the Crime Directorate led by D/Supt Crime. This Group meets monthly, supplemented by a quarterly Gold Group. The existing Standard Operating Procedure (SOP) has been reviewed and now incorporates details of when it is mandatory to activate, which includes at the beginning of a stop and search. The revised SOP was published in August 2019 and has been given a review date of 1 year to ensure it continues to reflect emerging best practice.

#### **Whilst dataset on use of force has improved, it does not monitor use of force by individual officers including reviewing CCTV and BWV material**

14. This was originally raised as an issue in the inspection of Custody, which took place before the PEEL inspection. It was evident that there were either recording or compliance issues as records from Custody and the system being used to record use of force (Pronto) did not fully reconcile. The reviews conducted since have shown where errors were occurring, however, since remedial action has been taken, compliance rates have improved significantly since 3<sup>rd</sup> June 2019 (see table below) and continue to be monitored. This should improve further as errors are identified, feedback is given and officers are requested to amend information.

Week Commencing	17/06/19	01/07/19	15/07/19	29/07/19
Compliance rate	77%	82%	90%	90%

15. A new dip sampling form is also now being used, which includes reviewing CCTV and Body Worn Video footage to ensure they correspond with written records. The gleaned learning points will be part of the feedback to not only Custody staff but to the Force more widely through organisational learning provisions.

**Should provide guidance and briefings to all workforce re Abuse of Position not just new officers and supervisors.**

16. Professional Standards Department (PSD) have introduced a programme of drop in awareness raising sessions being held at various locations around force to promote supportive activities PSD can provide, rules and regulations that guide investigations and recently introduced National Police Chiefs' Council/College of Policing Appropriate Personal Relationships and Behaviours in the Workplace Guidance. PSD also has at its disposal the now established quarterly Professionalism Newsletter which can be used to 'drip feed' messaging about abuse of position.

17. The Anti-Corruption Policy / SOP (an unrestricted document) is due for review in November 2019. Consideration is being given to promoting this with a news article launch around anti-corruption and abuse of position

**Contact:**

*Stuart Phoenix*

*Head of Strategic Development*

*T: 020 7601 2213*

*E: [stuart.phoenix@cityoflondon.pnn.police.uk](mailto:stuart.phoenix@cityoflondon.pnn.police.uk)*