

Committee(s): Professional Standards and Integrity Committee	Date: 18 th September 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, City of London Police	

Summary

Integrity Standards Board and Dashboard:

The Integrity Standards Board met on 3rd September 2019, chaired by the Assistant Commissioner. In addition to a discussion on revised terms of reference, the Integrity Dashboard was covered in detail, which did not disclose any underlying causes for concern. The meeting also received an update from the Head of Strategic Development on regional developments relating to the Code of Ethics, and an update on crime audits from the Force Crime and Incident Registrar. The Integrity Standards Development plan was also considered.

Code of Ethics Update:

Two London Police Challenge Forum (LCPF) events were due to take place on 10th and 19th June 2019 hosted by MPS/NCTPHQ and the British Transport Police respectively, however, due to availability of ethics associates, the event on the 19th June was cancelled. 4 dilemmas were considered by the remaining panel. The next panel hosted by CoLP (which will have happened by the time your Committee meets) will be 13th September 2019 and will be observed by Bath Spa University as part of a PEER review, which has been arranged by the Force to establish how well ethics is embedded organisationally.

The Head of Strategic Development attended the last regional meeting on the 25th June 2019.

The Integrity Standards Development Plan is also included for information. It includes an indicator to track progress against the areas for further improvement identified in the Integrated PEEL Assessment published on 2nd May 2019. A separate report has been submitted to your Committee detailing the Force's response to that inspection's findings. There is one red area in the plan, relating to the Force's potential involvement in a long term survey assessing ethical drift. The Head of Strategic Development has been tasked with progressing this with Learning and Development.

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 and 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 Committee and a representative from the Town Clerk's department.
4. The ISB met on 3rd September and was chaired by the Assistant Commissioner. The meeting covered the following topics:
 - a. Updated terms of reference. These were agreed subject to an amendment to split the meeting into two halves, with the second have a closed session with the HR Director, Professional Standards Department and Directorate Heads to consider confidential issues.
 - b. Dashboard. The revised dashboard was received with each indicator examined during the meeting. The information in the dashboard did not raise any causes for concern. A number of minor issues were referenced at the meeting to improve future reporting, these included:
 - i. The need for information providers to supply better contextual analysis linking the information specifically to the Code of Ethics/Integrity;
 - ii. A direction from the Assistant Commissioner that random drug testing should be conducted and overseen by Professional Standards and not Learning and Development; and
 - iii. Finance-related indicators still need to be incorporated.
 - c. Members are asked to note that the dashboard appended to this report as Appendix A has been slightly amended to reflect the issues raised at the ISB. The dashboard is now cross referenced to Organisational Learning Forum (OLF) reports to ensure that any learning referred to OLF around Integrity is also reflected within the dashboard.

- d. National Crime Recording Standard Audits – The Force Crime and Incident Registrar (FCIR) explained that due to the high levels of data cleansing that has taken place over the past quarter, the usual crime audits have had to be deferred to the second quarter. The FCIR did not raise any integrity-related concerns as a result of their work.
- e. The Head of Strategic Development provided an update on what activities and initiatives forces regionally are doing around the Code of Ethics (see paragraph 5 *et seq* below).
- f. The Integrity Development Plan was considered. The only red area relates to the Force potentially taking part in a long term survey to measure ethical drift. It was agreed that the Head of Strategic Development should liaise with Learning and Development and Organisational Development to progress. It was also agreed that going forward, progress against the integrity related areas for further improvement identified in the PEEL Legitimacy inspection should be submitted to the ISB.
- g. Finally, the Head of Strategic Development was tasked with preparing a report for the next ISB highlighting any trends or themes nationally coming out of the regional/national integrity groups.

Code of Ethics Update

5. Since your last Committee 2 London Police Challenge Forum (LCPF) events were scheduled to take place (10th and 19th June 2019). Unfortunately 1 of the events had to be cancelled due to the availability of ethics associates.
6. The remaining scheduled LCPF events for 2019 are:
 - a. 9th September 2019 hosted by MPS/NCTPHQ
 - b. 13th September 2019 **hosted by CoLP**
 - c. 16th October 2019 hosted MPS/NCTPHQ
 - d. 17th October 2019 hosted by BTP
 - e. 5th December 2019 **hosted by CoLP**
 - f. 6th December 2019 hosted by MPS/NCTPHQ
7. Members are reminded that they are welcome to observe any panel.
8. The panel on the 13th September 2019 will be observed by a Professor of Ethics from Bath Spa University as part of a peer review which has been organised by the Force to establish the extent to which ethics has been embedded by the organisation. The event will be split over 2 days. The LCPF will be observed on day 1, and will include interviews with the members of that panel. Day 2 will take place on 4th October 2019 and will include focus groups, interviews with senior staff and a document review, conducted by a Chief Superintendent from Devon and Cornwall Police.

9. A report will be prepared following the review, which will be shared with Members of your Committee.

Regional Police Ethics Network and UK Police Ethics Guidance Group

10. There last Regional Police Ethics Network was held on the 25th June 2019, and was attended by the Head of Strategic Development. The meeting, which welcomed the National Police Air Service (NPAS) as members for the first time, received updates on the following topics:
 - a. Digital policing integrity framework – this is progressing and a working group has been set up by the MPS to include representatives from policing and other agencies to agree an ethical framework that can be applied to digital policing. There is currently no detailed plan or date when this is expected to be complete.
 - b. The National Police Chiefs' Council's Inappropriate Relationship Guidance has been published.
 - c. The 'Knowledge Hub' is being trialled by Devon & Cornwall and Kent (in lieu of POLKA), as a means to share best practice and news relating to the Code of Ethics, although it is too early to assess its success.
 - d. There is likely to be an extraordinary UK Police Ethics Guidance Group looking at whether undercover policing is incompatible with the Code of Ethics. The event will consist of invited delegates of appropriately vetted/experienced people. The City of London Police has expressed an interest in taking part.
 - e. Wiltshire Police have developed the "Siren" App, which allows officers to pose an ethical dilemma they are facing, for a real time response. Future meetings will assess how this is being used and resourced.
 - f. Many forces are reviewing again where 'ethics' sits in their organisations, with a general move to single service provision with Professional Standards Departments.
 - g. The Regional Conference, which is likely to be deferred to early 2020, is expected to focus on ethical leadership.

11. The next meeting is scheduled for the 8th October 2019.

Integrity Standards Development Plan

12. The Integrity Standards Development Plan is included for Members' information at Appendix B. 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'.
13. The development section contains those areas that the Force has introduced for 2019/20.
14. The plan now references the areas for further improvement identified by Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services (HMICFRS)

for the Legitimacy aspect of their Integrated PEEL Assessment. A separate report has been submitted to your Committee that provides a more detailed update of progress against the areas identified for further improvement.

15. The only red area relates to the Force potentially taking part in the long term survey designed to measure ethical drift. Following an initial meeting with HR, the Head of Strategic Development has been tasked to liaise with Learning and Development and Organisational Development to progress this.

Appendices

- Appendix A – Integrity Dashboard Quarter 1
- Appendix B – Integrity Standards Development Plan (September 2019 update)

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