

Committee(s):	Date:
Professional Standards and Integrity Committee	29 th November 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 Force's Integrity Standards Board (ISB) met on 21st November 2019, 2 days after the Town Clerk's deadline for papers for your Committee, therefore a verbal update of the meeting will be given to your Committee. The appendices to this paper (the Dashboard and the Integrity Development Plan) are therefore included as drafts as they had not been considered by the ISB prior to submission to your Committee.

Code of Ethics Update:

Since the last ISB 2 London Police Challenge Forum (LCPF) events have taken place; the event on the 13th September, hosted by CoLP was chaired by the Detective Chief Superintendent Crime.

On the 4th October 2019, the Force underwent an integrity peer review, the results of which are awaited and which once received will form the basis for the next iteration of the Integrity Development Plan.

Both the regional and national Ethics panels met in early October – the principal subject of discussion was the development of a Data/Digital Ethical Framework to address concerns over the issues being raised by emerging technologies. An event at the MPS, to which the City of London Police has been invited, is being held on 6th December to formally launch a working group.

The Integrity Standards Development Plan is also included for information. It includes an indicator to track progress against the action plan to address areas for further improvement identified in the Integrated PEEL Assessment published on 2nd May 2019.

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 last board (21st November 2019) met 2 days following the Town Clerk's deadline for submission of papers, therefore it has not been possible to include a summary within this report. A verbal update will be provided at your Committee.
5. It follows that the Dashboard (Appendix A to this report) had not been considered by the ISB when this paper was submitted, it is therefore presented as a draft for information.

Code of Ethics Update

6. Since your last Committee 2 London Police Challenge Forum (LCPF) events have taken place; 4 were planned, but the events scheduled to be hosted by the Metropolitan Police Service (MPS) for mid-October had to be cancelled due to operational commitments associated with policing Extinction Rebellion and preparations for the (then) anticipated impact of Brexit. The event on the 13th September, hosted by the City of London Police went ahead and was chaired by the Detective Chief Superintendent Crime Directorate.
7. The remaining scheduled LPCF events for 2019 are:
 - a. 6th December 2019 hosted by MPS/National Counter Terrorism Police HQ
 - b. 10th December 2019 **hosted by CoLP** (changed from the 5th December, and with Assistant Commissioner Basu in attendance for some of the event).

Dates for the 2020 panels have not yet been set.

8. On the 4th October 2019, the Force underwent an integrity peer review conducted by a Chief Superintendent from Devon and Cornwall Police and a Professor of Ethics and Criminology from Bath Spa University. The review involved an assessment of Force documents (ToR and minutes from the ISB, and Integrity Development Plan) and 4 focus groups (ethics associates, police officers, police staff and senior officers/staff). A report is being prepared, once received it will be considered by the Force and will form the basis of the annual ethics review for the next iteration of the Integrity Development Plan.
9. The MPS are setting up an internal board to be called the “Ethical Issues Steering Committee” to consider ethical issues and their impact of the MPS and its subsequent response. The board will be chaired by DAC Matt Horne. The Head of Strategic Development has been invited as the City of London Police lead for the LPCF, and will attend with a view to sharing best practice. The first meeting is due to take place in February 2020.

Regional Police Ethics Network and UK Police Ethics Guidance Group

10. The last Regional Police Ethics Network was held on the 8th October 2019. The meeting, which welcomed the ACC South West Crime Unit as a new member, covered 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. The LPCF event on the 6th December at New Scotland Yard is being used by this group to formally launch their work in this area, representatives from City of London Police have been invited.
 - b. The ‘Knowledge Hub’, which was being trialled by Devon & Cornwall and Kent (in lieu of POLKA¹), is now being rolled out across all forces and is hoped will be more effective than POLKA proved to be.
 - c. There was some discussion about forming a specialist panel of officers/staff that are vetted to ‘Developed Vetting’ level so that some subjects (such as counter terrorism tactics) can be discussed more freely. This will be explored in more detail.
 - d. The Regional Conference has been deferred to 29th April 2020 and will be primarily concerned with ethical leadership and organisational learning.

11. The next meeting is scheduled for the 15th January 2020.

UK Police Ethics Guidance Group

12. The last UK Police Ethics Guidance Group (UKPEGG) was held on Friday 11th October 2019. The main topic under consideration was the evolving Data/Digital Ethics Framework (the subject of the event being held at the MPS

¹ Police On-Line Knowledge Area

on 6th December 2019) and a recognition that the subject is so wide ranging that it merits a separate agenda and event.

13. Members were asked to consider whether the recruitment of the 20,000 additional officers is likely to raise any specific ethical issues.

14. The next UKPEGG will take place on 31st January 2020.

Integrity Standards Development Plan

15. 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'.

16. The development section contains those areas that the Force has introduced for 2019/20.

17. 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 on this subject was submitted to your last Committee.

18. The sole red area relates to the Force potentially taking part in the long term survey designed to measure ethical drift. It has been agreed in Force that City of London Police would like to take part in the survey and contact has now been made with those organising the survey to establish (a) whether the option to join is still current, and (b) the logistics of participation. As the survey is on-line, there is no financial implication to taking part. Pending the responses to (a) and (b) above, however, this will remain red.

Appendices

- Appendix A – Integrity Dashboard Quarter 2
- Appendix B – Integrity Standards Development Plan (November 2019 update)

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