

Committee(s):	Date:
Professional Standards and Integrity Committee	2 nd March 2020
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 26th February 2020, which was 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 your last Committee 1 London Police Challenge Forum (LCPF) event has taken place on the 10th December 2019 hosted by the City of London Police (CoLP). It was a joint event with the Royal Navy. The Head of Strategic Development chaired one of the three panels that each considered the same 4 dilemmas.

The LCPF is rebranding the Police Ethics Engagement Forum to reflect BTP's and others' involvement, and better articulate its role within the emerging Capital Policing Ethics Partnership.

Both the regional and national Ethics panels met in January 2020, the principal subject of discussion was the development of a Data/Digital Ethical Framework to address concerns over the issues being raised by the use of emerging digital technologies.

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 2019 integrated PEEL Assessment.

The report from the PEER Review has now been received by the Force. It is generally very complimentary of the work done to date but does offer some recommendations for future development. These will be incorporated into the Integrity Standards Development Plan and presented and will be presented to the next ISB.

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 (26th February 2020) met 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. Members should also note that at the time of submission, data relating to training was still awaited and is therefore not included in the draft.

Code of Ethics Update

6. Since your last Committee, 1 London Police Challenge Forum (LPCF) event has taken place, which was hosted by the City of London Police at CH Rolph Hall. It was a joint event between the LPCF and the Royal Navy, consisting of 3 panels (chaired by the Head of Strategic Development, a Chief Superintendent from the Metropolitan Police Service (MPS), and a Royal Navy Surgeon Commander. The latter half of the event was also attended by the MPS Assistant Commissioner.
7. The dates for the 2020 panels have not yet been arranged. Partially as a result of the PEER review, but also due to a reorganisation of how ethics is being approached by the London forces, and to reflect that not only London forces are involved in the group (e.g. the British Transport Police and the Counter Terrorism national command), it is likely the LPCF will re-brand over the following few months to 'Police Ethics Engagement Forum'. This will form a

constituent part of the 'Capital Policing Ethics Partnership' which is envisaged will be constituted by:

- a. The MPS Ethical Issues Scanning Committee (providing strategic oversight of ethical issues impacting the MPS, chaired by DAC Horne (note: CoLP Head of Strategic Development is a member of this group));
 - b. MOPAC Independent Ethics Panel for London;
 - c. Police Ethics Engagement Forum (currently the London Police Challenge Forum); and
 - d. MPS Ethics Research Committee (a new committee that will review all requests for research from an ethical perspective).
8. A relaunch of the LPCF is being planned for April 2020.
9. The LPCF has also been in discussion with a new group set up by the banking and financial service industries to consider the ethical leadership issues resulting from the public perception issues those industries have faced in recent years. They have agreed that the LPCF (which by extension includes CoLP's Head of Strategic Development) can take part in future events, which they anticipate will run 2 or 3 times per year.

Digital Policing event

10. On the 6th December 2019 the MPS hosted an event dedicated to the ethical implications being raised by digital policing. It was attended by many forces, including the City of London Police, and the Home Office. The event was used as a 'stock take' of the current and emerging issues relating to digital policing. The event confirmed how diverse and complex the issue is, with those present agreeing it could not be wrapped up in the general world of ethics but merited a separate working group. A second meeting has not yet been arranged, but when it is, it will look to set up that group from interested and relevant parties from across policing.

Regional Police Ethics Network and UK Police Ethics Guidance Group

11. The last Regional Police Ethics Network was held on the 15th January 2020 in Bristol. Apart from North Wales Police being present for the first time, there was very little new business discussed, with most of the meeting considering outcomes from previously considered dilemmas and planning for the annual conference, which is now deferred until October 2020.
12. The last UK Police Ethics Guidance Group (UKPEGG) was held on 31st January 2020. The evolving Data/Digital Ethics Framework (the subject of the event held at the MPS on 6th December 2019) continued to dominate the agenda. The other major topic considered was the ethical issues raised by forces trying to improve their representation through recruiting against the recently announced uplift.

13. It was also noted at the meeting that the Code of Ethics, which has now been in place for 6 years, should be reviewed. The group offered to set up a working group to support the College of Policing with this task.

Integrity Standards Development Plan

14. The Integrity Standards Development Plan is included for information (see 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'.
15. The development section contains those areas that the Force has introduced for 2019/20.
16. The plan 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, and progress updates have been included in the plan for Members' information. Progress against HMICFRS recommendations are also reported to the Police Performance and Resource Management Committee.
17. Members will note that one of the areas for development in the plan has been closed. This relates to the long-term integrity review that was discussed last year at a regional ethics network event (Action 2.1) The officer that presented the initiative has now left the force in question and the force is no longer co-ordinating the activity, therefore there is no longer a study to take part in.
18. The single new red area relates to amending the Integrity Standards Development Plan following the receipt of the peer review report (Action 2.4). It was not received until mid-January, which coincided with a period of annual leave and significant activity around the policing plan and Transform. The plan will be amended before your Committee's next meeting and will be submitted to you for information and scrutiny.

Peer Review

19. 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 Leadership Team members).
20. The final report following that review was received by the Force in mid-January and is attached as Appendix C for information. The report is generally complimentary of the efforts made by the Force to date, but does offer some recommendations for future development. These revolve principally around raising the profile of the LPCF and the role of ethics associates through a communications plan and attracting new ethics associates.

21. Accepted recommendations will be incorporated into the reviewed Integrity Standards Development Plan to be presented to the next ISB and thereafter to your Committee.

Appendices

- Appendix A – draft Integrity Dashboard Quarter 3
- Appendix B – draft Integrity Standards Development Plan (February 2020 update)
- Appendix C – Peer review report for the City of London Police

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