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Appendix B

POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2019-20 February 2020 update



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INTRODUCTION

This development and delivery plan has been produced to ensure that the City of London Police continues to discharge its obligations introduced by the (then) ACPO Police Integrity Maturity Model, supports the continued embedding of the national Police Code of Ethics and implements improvements to ethics and integrity in the Force in line with national requirements and best practice.

PLAN SUMMARY

1. Commit Measures	Traffic Light Tracker			
	May 19	Sep 19	Nov 19	Feb 20
1.1 Force has issued a statement committing to support and embed the Police Code of Ethics	GREEN	GREEN	GREEN	GREEN
1.2 Maintain the Force Integrity Delivery Plan	GREEN	GREEN	GREEN	GREEN
1.3 Maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force	GREEN	GREEN	GREEN	GREEN
1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas	GREEN	GREEN	GREEN	GREEN
1.5 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes	GREEN	GREEN	GREEN	GREEN
1.6 Maintain a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates)	GREEN	GREEN	GREEN	GREEN
1.7 Maintain a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan	GREEN	GREEN	GREEN	GREEN
1.8 Ensure training on standards, values and leadership ethics is available for all staff	GREEN	GREEN	GREEN	GREEN
1.9 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures	GREEN	GREEN	GREEN	GREEN

2. Development Measures	Traffic Light Tracker			
	May 19	Sep 19	Nov 19	Feb 2020
2.1 Consider with HR/OD taking part in the long term 'ethical drift' survey	AMBER	RED	RED	CLOSED
2.2 Consider an internal board to advise on and review key decisions and processes	CLOSED	CLOSED	CLOSED	CLOSED
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	WHITE	WHITE	WHITE	AMBER
2.4 Arrange an independent peer review of organisational integrity arrangements	AMBER	AMBER	AMBER	RED
2.5 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assesment report when published.	AMBER	AMBER	AMBER	AMBER

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PERFORMANCE REPORT

Traffic Light Colour	Definition of measure achievement
GREEN	Aim is achieved in date and to level set.
AMBER	Current projections indicate this measure will not be met unless this additional action taken
RED	No progress on measure or deadline/level has not been met and it is unlikely will be met.
WHITE	Due date not reached

Target Report Checklist

- Current level of achievement
- Dates for work completed
- Dates future work will be completed by (milestones)
- Reasons for current achievement level
- Any risks that have been realised
- Work undertaken to manage realised risk
- Work to be undertaken to manage risk against target
- Impact of other indicators on this work area
- A statement from owner about whether they think the measure will or will not be achieved by the due date based on the information provided above.

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COMMITMENT DASHBOARD – These indicators represent provisions the Force must maintain as a foundation for its processes and governance concerning the continuing promotion and embedding of integrity and the Code of Ethics. Detailed reporting will be by exception if any of the provisions change from their ‘green’ implemented status.

INDICATOR	Current position (Feb 2020)	May 19	Sep 19	Nov 19	Feb 20
1.1 Force has issued a statement committing to support and embed the Police Code of Ethics	Included in all major force publications – Policing Plan, Corporate Plan and Annual Report	GREEN	GREEN	GREEN	GREEN
1.2 Maintain a Force Integrity Delivery Plan	Plan in existence since Nov 2016, updated quarterly	GREEN	GREEN	GREEN	GREEN
1.3 Maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force	The Integrity Standards Board is established, chaired by a chief officer, attended by all directorates and representatives from the Town Clerk’s Department and Police Authority Board. The last meeting was November 2019	GREEN	GREEN	GREEN	GREEN
1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas	In existence and attend Integrity Standards Boards	GREEN	GREEN	GREEN	GREEN
1.5 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes	In existence, last outcomes published 12 th December 2019 (checked February 2020)	GREEN	GREEN	GREEN	GREEN
1.6 Maintain a process to support the Force’s participation in the London Panel Challenge Forum (Ethics Associates)	Maintained, last meeting 10 th December 2019, next meetings planned for April 2020	GREEN	GREEN	GREEN	GREEN
1.7 Maintain a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan	The Assistant Commissioner is the lead for integrity matters, chairing Integrity Standards Board, Organisational Learning Forum, Crime Data Integrity Oversight Board and lead on the associated area of Professional Standards. The Commander (Ops) additionally chairs London Police Challenge Forum panels for additional resilience	GREEN	GREEN	GREEN	GREEN
1.8 Ensure training on standards, values, leadership and ethics is available for all staff and included in all mandatory training	Information on standards, values and leadership is available to all staff on the intranet. All mandatory training courses incorporate the Code of Ethics, which is also part of induction.	GREEN	GREEN	GREEN	GREEN

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1.9 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures	Strategic Development checks the College of Policing APP site monthly to identify any revised or new APP to ensure it is considered by the Force	GREEN	GREEN	GREEN	GREEN
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1. Development Measures	
MEASURE	2.1 1 Consider with Human Resources/Organisational Development taking part in the long term 'ethical drift' survey
OWNER	Head of Strategic Development / HR/ OD
AIM/RATIONALE	To inform Force development. The survey seeks to assess levels of ethical decline over an officer's career. This will inform long term planning around activities that can be put in place to mitigate any decline.
MEASUREMENT	Head of Strategic Development to provide ISB with details of activities supporting this indicator
DUE BY	July 2019
TRAFFIC LIGHT CRITERIA	Green: participation agreed and rolled out Amber: Activity in train (within due time) but not delivered. Red: No activity and past due date
TRAFFIC LIGHT	ACTION CLOSED
CURRENT POSITION	
<p>May 2019 - Initial discussions have taken place with Organisational Development, who are broadly supportive of the proposal. A meeting is still to take place with HR. If HR agrees, a paper will be prepared for Integrity Standards Board to consider, to cover the proposal and roles and responsibilities.</p> <p>Aug 2019 update – no decision has yet been taken. HoSD to meet with Head of HR to progress before the next ISB (3rd September).</p> <p>Nov 2019 update – The Transform programme is doing some work on organisational culture and it is felt this study would complement that work. The HR representative on that programme has agreed to be the link for this work and contact has now been made with the Regional Police Ethics Network expressing our interest in taking part in this study. Pending the outcome of that request, and arrangements being made locally for ongoing participation, this action will remain red until those things are in place.</p> <p>Feb 2020 update – Head of Strategic Development the Regional Police Ethics Network clerk made contact with the police force originally cited as running this survey. The individual that presented at the regional meeting no longer works for the force and no-one else is progressing this on their behalf. The force is not co-ordinating or progressing any such survey. This action is accordingly closed.</p>	

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1. Development Measures	
MEASURE	2.2 Consider an internal board to advise on and review key decisions and processes
OWNER	Head of Organisational Development
AIM/RATIONALE	This board would promote transparency and help to influence organisational behaviours.
MEASUREMENT	Existence of a board that produces useful information/advice to other boards/managers/policy developers.
DUE BY	July 2019
TRAFFIC LIGHT CRITERIA	Green: Board established and meeting to a schedule; AMBER: Board established but meeting ad hoc; RED: Board not yet established
TRAFFIC LIGHT	ACTION CLOSED
CURRENT POSITION	
<p>The ISB held in December 2018 allocated this as an action to the Head of Organisational Development to consider as part of the Leadership review.</p> <p>May 2019 - This matter CLOSED was considered at a meeting of the Senior Leadership Team who decided that a separate panel is not required. This action will not therefore be progressed and is.</p>	

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2 Development Measures	
MEASURE	2.3 Conduct an annual review of the Force integrity programme and implement identified improvements
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure the Force continues to develop its approach to integrity and has plans to embed best practice.
MEASUREMENT	Review completed and reported to ISB
DUE BY	November 2019
TRAFFIC LIGHT CRITERIA	Green: Review complete and action plan amended Amber: review complete but action plan unamended or review overdue by 1-3 months Red: Review overdue by 3 months or more with unamended action plan.
TRAFFIC LIGHT	AMBER
CURRENT POSITION	
<p>The peer review (see following indicator) and anything emerging from regional and national meetings will inform this indicator, which is not due until October 2019.</p> <p>Nov 19 update: The peer review took place on October 4th 2019. The Force awaits the results of the review, which will form the basis of the annual review.</p> <p>Feb 20 update: The Force received the PEER review results mid-way through January. They are now being considered and accepted recommendations will be included in a reviewed implementation plan, to be presented to the next Integrity Standards Board.</p>	

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2 Development Measures	
MEASURE	2.4 Arrange an independent peer review of organisational integrity arrangements
OWNER	Head of Strategic Development
AIM/RATIONALE	To assess the extent to which integrity related arrangements in force are sufficient and embedded, and inform development of this plan
MEASUREMENT	Review complete and action plan amended
DUE BY	September 2019
TRAFFIC LIGHT CRITERIA	Green: Review complete and action plan amended Amber: Action taken to organise the review, or review complete but no changes to action plan. Red: review not yet complete or completed by no changes to action plan after 2 months following receipt of the report
TRAFFIC LIGHT	RED
CURRENT POSITION	
<p>May 2019 – Contact has been made with Bath Spa University, who will oversee the Peer Review, with the following agreed:</p> <p>Professor McVean (Professor of Ethics Bath Spa University) to observe a meeting of the London Police Challenge Forum on 13 September 2019 and interview panel members. Ch Supt Sam De Reya (Devon and Cornwall Police) to visit the Force on October 4th to review existing provisions and conduct focus groups with senior personnel and front line personnel. A report will be prepared thereafter which will inform the development of this plan going forward.</p> <p>Aug 2019 – the May update remains current</p> <p>Nov 2019 update – the peer review took place on 4th October 2019, however, as the results have not yet been received by the force and no changes have been made to the action plan as a result, this indicator remains AMBER as per the traffic light criteria.</p> <p>Feb 2020 update – the review report was received mid-January 2020. This coincided with significant activity around the new policing plan, Transform and a period of annual leave for the Head of Strategic Development. The report has been reviewed but the development plan not yet amended. It will be complete before the next Integrity Standards Board.</p>	

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2 Development Measures	
MEASURE	2.5 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assessment report
OWNER	Head of Strategic Development (and any other relevant individual identified by the report)
AIM/RATIONALE	To ensure the Force actions best practice identified by HMICFRS.
MEASUREMENT	Progress reported to Performance Management Group and ISB
DUE BY	March 2020
TRAFFIC LIGHT CRITERIA	Green: All AFIs delivered; Amber: Action in progress to deliver AFIs but not fully delivered; Red: AFI not delivered by due date
TRAFFIC LIGHT	AMBER
CURRENT POSITION	
<p>The Integrated PEEL report was published in early May. Whilst the Force was graded ‘Requires improvement’ for the Legitimacy aspect of the inspection, two of the areas identified for further improvement are relevant to integrity and the Code of Ethics:</p> <p>AFI 7 and 8 – the Force should review is external scrutiny of use of force and stop and search</p> <p>AFI 9 – the Force should extend its unconscious bias training to all its officers</p> <p>AFI 10 – The Force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up to date and include current data</p> <p>AFI 11 – The Force should ensure that its counter corruption unit (1) has enough capability and capacity to counter corruption effectively and proactively; (2) Can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the Force’s data and indentify computer misuse; and (3) Builds effective relationships with individuals and organisations that support and work with vulnerable people.</p> <p>August update: An action plan to address all the AFIs identified in the report has been drafted. A report has been submitted to the next Professional Standards and Integrity Committee (18th September) providing details of the Force’s response to these AFIs. This indicator will remain open until all actions have been delivered.</p> <p>February 2020 update: AFIs 7 and 8 remain AMBER. Both areas were scrutinised by the PAB at its November meeting through the Use of Force (part of the Custody update) and stop and search update. A revised group now exists. Training of members of the group is ongoing, with a first meeting to assess data scheduled for March 11th. Following that meeting taking place, this should be GREEN.</p> <p>AFI 9 is GREEN – training commenced in November 2019, with completion being tracked by Learning and Development and reported to Performance Management Group.</p> <p>AFI 10 is AMBER – these documents were reviewed for 2018/19 but are now being re-evaluated for 2019/20. A Nactional Crime Agency updated threat assessment was received in December 2019, against which Force documents are being evaluated. It is anticipated this will be GREEN by the due date.</p> <p>AFI 11 is AMBER – Although staff have been recruited there remains an issue connected to the monitoring of computer systems, which is being addressed but which is maintaining this indicator at AMBER.</p>	