

<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Date:</b> 14 <sup>th</sup> September 2020
<b>Subject:</b> Integrity and Code of Ethics Update	<b>Public</b>
<b>Report of:</b> Commissioner of the City of London Police	<b>For Information</b>
<b>Report author:</b> Head of Strategic Development, City of London Police	

## Summary

A version of this report was submitted to your Police Authority Board on 29<sup>th</sup> July 2020 and has been updated to incorporate a draft of the Integrity Standards Development Plan (being considered by the Force's Integrity Standards Board on the 15<sup>th</sup> September).

### *Integrity Standards Board:*

The Force's Integrity Standards Board (ISB) last met on 26<sup>th</sup> February 2020 and was reported to the PS&I Committee. The meeting scheduled for June 2020 was cancelled. The next meeting will take place on 15<sup>th</sup> September 2020 and depending on the government guidance in force at the time will probably be via telephone conference with some people in the office. As it takes place immediately after your Committee, it is not possible to provide the usual update. The ISB dashboard will be circulated for Members' information separately following its consideration at ISB.

### *Code of Ethics Update:*

There have not been any London Police Challenge Forums (LPCF) since December 2019. A date was scheduled for April 2020 for a re-launch of the LCPF (at which it was to be rebranded to the Police Ethics Engagement Forum), however that was cancelled following the Covid-19 lockdown. The Head of Strategic Development has met virtually the Metropolitan Police Service (MPS) Co-ordinator of the LCPF on a number of occasions to explore effective ways that these events can take place remotely, however, it will rely on all participant having access to MS Teams or similar, which is in the process of being rolled out to City of London Police (CoLP) personnel.

The Regional and National meetings have managed to operate remotely, with discussions dominated by issues relating the Covid-19 situation (e.g. the impact on the quality of decision making in the face of rapidly shifting priorities, changing to legislation and enforcement of guidance). The next national meetings is scheduled to take place on 13<sup>th</sup> October 2020.

The Integrity Standards Development Plan has been reviewed by the Head of Strategic Development. As the last ISB was cancelled it has not yet been considered by the Force, however, in anticipation of it being agreed on 15<sup>th</sup> September, it is included here in draft form for Members' information.

The plan includes progress against areas for improvement (AFIs) identified by HMICFRS<sup>1</sup> that are relevant to the PS&I Committee. Only 1 action that has been rolled forward remains AMBER, and relates to the introduction of new software in Force.

### **Recommendation(s)**

Members are asked to note the report.

### **Main Report**

#### **Current Position**

##### *Integrity Standards Board*

1. 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 the Professional Standards and Integrity (PS&I) Committee and a representative from the Town Clerk's department.
2. The last board was held on 26<sup>th</sup> February 2020. A meeting was scheduled for June, however, following the Covid-19 lockdown a number of force meetings were temporarily halted, with ISB being one such meeting. Depending on Government guidance in force at the time, the next meeting, which will take place on the same day as your Committee, is likely to be 'virtual', in common with most other meetings currently. Despite the June meeting not taking place, the Force continued to gather the data for the dashboard, which has been reviewed outside of the normal meeting structure by the Head of Strategic Development to ensure there was nothing critical that required specific Force intervention.
3. The current dashboard will be considered at the ISB being held the day after your Committee, therefore it is not possible to provide Members with an overview of the ISB on this occasion. The data for the dashboard was still being collated by the deadline for your Committee. Following discussion at the ISB, the dashboard will therefore be circulated outside of the meeting for Members' information.

##### ***Code of Ethics Update***

4. There have not been any London Police Challenge Forums (LPCF) since December 2019. A date was scheduled for April 2020 for a re-launch of the LCPF (at which it was to be rebranded to the Police Ethics Engagement Forum), however that was cancelled following the Covid-19 lockdown.

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<sup>1</sup> Her Majesty's Inspectorate of Constabularies, Fire and Rescue Services

5. During May, an attempt was made to run a phone-in discussion to test the viability of it running as a concept in place of physical meetings, however, it was felt that the free-flowing nature of the discussion and rapid exchange of thoughts that normally takes place at the LPCF was hampered by the medium to such a degree that it did not work effectively.
6. The Head of Strategic Planning has met virtually the MPS Co-ordinator of the LPCF on numerous occasions to explore other methods of holding these meetings, including using video applications such as Teams or Zoom. It has been agreed in principle that this will be trialled as soon as all relevant (or a sufficient number) personnel have access to these applications on their work machines. The rollout of this technology began on September 1<sup>st</sup> and is ongoing.
7. Within the MPS (who lead on the LPCF), the senior officer who led on the initiative has been promoted and moved to a different force. The MPS is in the process of deciding where responsibility for integrity and ethics sits, with a strong current preference for it to be their Professional Standards Directorate (it had been sited independently of that Directorate, similar to the current position in CoLP).
8. During April 2020, the Head of Strategic Development took part in an online meeting with the Institute of Business Ethics, who are developing a new ethics training guide for use by private and public sector organisations. When complete, the Force will be provided with a copy, which will be reviewed for best practice that the City of London Police can make use of. This is expected by the end of the year.

### ***Regional Police Ethics Network and UK Police Ethics Guidance Group***

9. No physical meetings of the Regional Police Ethics Network or the UK Police Ethics Guidance Group have taken place since the last report to the PS&I Committee. Both groups have, however, managed to operate remotely.
10. The last UK Police Ethics Guidance Group (UKPEGG) was held on 23<sup>rd</sup> April 2020 as a telephone conference. It was the first one to be hosted by the new NPCC lead, who is the Deputy Chief Constable of Dorset Police. It was a much shorter event than usual, with the main points of business concerning the publication of national guidance relating to sexual harassment in the workplace, and noting that the College of Policing (in attendance) are now leading on revising the National Police Code of Ethics. No timescales were provided regarding how long this is expected to take. The next national meeting is scheduled to take place on 13<sup>th</sup> October 2020.
11. The Regional Police Ethics Network usually meets a few days before the UKPEGG so that any outcomes can be fed into the national forum, however, the April meeting was cancelled due to Covid and was not held remotely. The latest meeting of the regional group took place on 1<sup>st</sup> July 2020 using Skype. No new date has yet been set for the next regional meeting, but is likely to be immediately prior to the 13<sup>th</sup> October.

12. The meeting covered the following points:

- a. The impact Covid-19 is having on decision making due to rapidly changing legislation, shifting priorities and issues relating enforcing guidance.
- b. It was noted that member forces had temporarily halted their internal boards (a couple had held 1), but these were slowly being re-introduced as organisations adapt to different ways of working.
- c. Publication of the regional group's annual report, which is expected over the next month.
- d. Referral of a dilemma to the UKPEGG, raised by the British Transport Police relating to competing priorities impacted by closing a railway line.
- e. Decision to hold an 'on-line' regional conference during October 2020.

13. The group also heard how 2 members of the group (the ACC of Dorset Police and a Professor of Criminology and Ethics) have been involved in national briefing meetings, advising boards on the ethical impact of proposals and decisions.

### ***Integrity Standards Development Plan***

14. The Integrity Standards Development Plan has been reviewed by the Head of Strategic Development, however, the cancellation of the last ISB means it has not been considered by the members of that group and has not therefore been through any Force governance processes. It will be considered for the first time at the ISB being held on the 15<sup>th</sup> September; however, so that Members do not have to wait for the next PS&I Committee it is attached here as a draft for information.

15. Members will note the amber area in Part 1 of the plan, this is purely due to the cancellation of the last ISB. Part 2, the development section, has the section on progress against areas for improvement (AFIs) identified by HMICFRS<sup>2</sup> that are relevant to the PS&I Committee carried over. It will remain in the plan until all AFIs are fully delivered. Currently, the only element that remains outstanding relates to the introduction of new counter corruption software in Force.

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<sup>2</sup> Her Majesty's Inspectorate of Constabularies, Fire and Rescue Services