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POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2020-21 September 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			
	Nov 19	Feb 20	Jun 20	Sep 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	AMBER	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			
	Nov 19	Feb 2020	Jun 20	Sep 20
2.1 Consider with HR/OD taking part in the long term 'ethical drift' survey	RED	CLOSED		CLOSED
2.2 Consider an internal board to advise on and review key decisions and processes	CLOSED	CLOSED		CLOSED
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	WHITE	GREEN		Delivered
2.4 Arrange an independent peer review of organisational integrity arrangements	AMBER	GREEN		Delivered
2.5 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assesment report when published.	AMBER	AMBER		AMBER
NEW MEASURES FROM SEPTEMBER 2020				
2.1 Work with Corporate Communications to re-promote the work of the London Police Challenge Forum (LCPF) and improve awareness of the Police Code of Ethics				NEW
2.2 Work with the MPS Coordinator to revise the LPCF Terms of Reference				NEW
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements				NEW
2.4 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assesment report when published (<i>carried forward</i>)				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 (Sep 2020)	Nov 19	Feb 20	Jun 20	Sep 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. There was no meeting during June/July, due to Covid restrictions.	GREEN	GREEN	AMBER	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 (none since that date)	GREEN	GREEN	GREEN	GREEN
1.6 Maintain a process to support the Force’s participation in the London Panel Challenge Forum (Ethics Associates)	Process maintained, but no meetings organised during 2020 due to Covid restrictions, but Force is capable of participating when organised.	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
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 Work with Corporate Communications to re-promote the work of the London Police Challenge Forum (LCPF) and improve awareness of the Police Code of Ethics
OWNER	Head of Strategic Development / Corporate Communication
AIM/RATIONALE	Focus groups conducted as part of the Integrity Peer Review highlighted the need for improved marketing and awareness raising of the Code of Ethics and work of the LPCF.
MEASUREMENT	Head of Strategic Development to provide ISB with details of activities supporting this indicator
DUE BY	December 2020
TRAFFIC LIGHT CRITERIA	Green: Articles published Amber: Activity in train (within due time) but not delivered. Red: No activity and past due datearticipation
TRAFFIC LIGHT	
CURRENT POSITION	
NEW ACTION	

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1. Development Measures	
MEASURE	2.2 Work with the MPS Coordinator to revise the LPCF Terms of Reference
OWNER	Head of Strategic Development
AIM/RATIONALE	The Integrity Peer Review noted that the terms of reference of the LPCF had not been updated since the group's formation in 2016 and require amending.
MEASUREMENT	Revised Terms of Reference agreed by constituent organisations of the LPCF.
DUE BY	December 2020
TRAFFIC LIGHT CRITERIA	Green: TORs produced and agreed by due date; AMBER: work in train within the due date; RED: TORs not produced by due date
TRAFFIC LIGHT	
CURRENT POSITION	
NEW ACTION	

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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	September 2021
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	
CURRENT POSITION	
<p>Action replicated for 2021. The amendments in this version of the development plan represent the results of the Integrity Review that took place late 2019/early 2020.</p>	

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2 Development Measures	
MEASURE	2.4 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 2019 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>	

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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.

September 2020 Update

AFIs 7, 8, 9 and 10 are all now delivered and GREEN (reported to PAB in July 2020).

AFI 11 – remains AMBER. The only outstanding element of this AFI relates to the implementation of new counter corruption software in Force. It is shown as AMBER because the Force master action plan shows the due date to be end of September 2020, which the Force is working to. After that date, it will be RED. There are clear sensitivities relating to such software, therefore a fuller update can be provided by the Detective Superintendent PSD in the non-public section of your Committee.