

POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2020-21

April 2021 update



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			
	Sep 20	Nov 20	Jan 21	Apr 21
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			
	Sep 20	Nov 20	Jan 21	Apr 21
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	AMBER	GREEN	GREEN
2.2 Work with the MPS Coordinator to revise the LPCF Terms of Reference	NEW	AMBER	CLOSED	CLOSED
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	NEW	WHITE	WHITE	WHITE
2.4 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assessment report when published (<i>carried forward</i>)	AMBER	RED	GREEN	GREEN

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.

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)	Sep 20	Nov 20	Jan 21	Apr 21
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. Meeting held 22nd April 2021	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 (none since that date – checked 22nd Apr 2021)	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

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	GREEN
CURRENT POSITION	
<p>April 2021 update: Resourcing issues meant that the intended meeting date had to be postponed to April, however, prior to the meeting 2 articles were published on the Force intranet, one specifically aimed at promoting the Ethics Panel and asking for new volunteers. A second article focusing on a televised programme regarding historic corruption in policing, also linked the article to the Ethics Panel piece. As a result of the publication, 7 new volunteers have offered to become Ethics Associates.</p> <p>January 2021 update: A meeting with Corporate Communications (CC) took place on 16th December 2020 where it was agreed that CC would publish 1 or 2 articles to re-promote the work of the London Police Challenge Forum internally, and to attract additional ethics associates. Publication of the content will coincide with the run up of the internal event which is scheduled for 18th February 2021.</p> <p>It was further agreed that any outcome from the event would be published internally.</p>	

1. Development Measures	
MEASURE	2.2 Work with the MPS Coordinator to revise the London Police Challenge Forum (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	CLOSED
CURRENT POSITION	
<p>Head of Strategic Development has met with the MPS coordinator twice to discuss this issue and make changes to the partnerships terms of reference. Whilst changes have been made, they have not yet been consulted on with the other partnership forces (BTP & National Police Counter Terrorism) and remain therefore unagreed. To meet the December deadline, attempts will be made to agree the ToR ahead of the next formal meeting, the date for which is still to be set.</p> <p>April 2021 update: Further to the below, no decision has yet been made by the MPS regarding the future of any London-wide Ethics Group, however, the Force is prepared and capable to engage with such a group should one be re-established.</p> <p>January 2021 update: The future of the LPCF is currently in some doubt. During 2020, when no meetings were being held, within the MPS responsibility for leading on integrity/ethics transferred to their Professional Standards Directorate (towards the end of the year). It is currently unclear if the LPCF central coordinator post will continue in that role as part of the MPS PSD, or whether the MPS intends to hold its own internal panels but no longer participate in a London regional group – these matters are still being discussed. As a result of this, the LPCF co-ordinator did not consult on the revised terms of reference. Pending a decision from the MPS in terms of whether they intend to proceed with the LPCF in any form, this action is closed.</p>	

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	WHITE
CURRENT POSITION	
The review will not take place until June/July 2021.	

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	GREEN
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>	

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).

November 2020 Update

AFI 12 is now RED having missed the deadline to have the software in place by the end of September 2020. There are sensitivities relating to this software, therefore a fuller update can be provided by the Detective Superintendent PSD in the non-public section of your Committee.

January 2021 Update: The relevant software is procured and is being installed in February 2021. All actions are now complete.