

Committee: Police	Date: 6 th December 2013
Subject: Integrity Statement and Monitoring	Public
Report of: Commissioner of Police POL 60/13	For Information
<p><u>Summary</u></p> <p>Standards of Integrity in the police service in the United Kingdom have come under increasing public and official scrutiny in recent times. A series of incidents which have received significant media coverage have caused concern about the standard of ethics and integrity within the police service.</p> <p>In response, the police service is putting in place a range of short and longer term reforms to address these concerns. The development of an integrity statement forming part of the City Futures transformational change programme, along with an integrity action plan and monitoring dashboard will allow the Force to demonstrate its commitment to work closely with its workforce to identify any potential integrity concerns and to proactively manage these in the workplace.</p> <p>The continued governance by the Police Committee through the Professional Standards and Integrity Sub Committee will provide the required oversight and scrutiny that will only serve to strengthen the mechanisms to ensure the City of London Police is a Force that acts with integrity.</p> <p>Members may wish to note that draft versions of the integrity statement and supporting documents were presented to the Professional Standards and Integrity Sub Committee on the 13th November 2013 where Members gave input and feedback.</p> <p>Recommendations</p> <p>It is recommended that Members note the contents of this report</p>	

Main Report

Background

1. Standards of Integrity in the police service in the United Kingdom have come under increasing public and official scrutiny in recent times following a series of incidents which have attracted significant media coverage. In response, the police service is putting in place a range of short and longer term reforms to address these concerns.
2. Her Majesty's Inspectorate of Constabulary (HMIC) produced a report 'Without Fear or Favour – A review of police relationships' in 2011 and a re-inspection of Force action plans in 2012 which found that corruption was not endemic in the police service. Areas of risk were identified including the misuse of credit cards; a lack of clarity around the acceptance of gifts and hospitality; and also conflicts of interest, tax and other legal implications for police officers and staff holding second jobs or other business interests.
3. HMIC included the City of London Police in the 2012 re-inspection programme and, as well as representatives from the Force, HMIC Inspectors interviewed the Chairman of the Police Committee, the Chairman of Professional Standards and Integrity Sub Committee, and officers from the Town Clerk's Department. There were a few issues identified for the Force to address arising from the inspections, including the recording of declined hospitality, the sheer number of corporate credit cards held by officers and staff, the need to introduce a random drug testing policy and procedure and the need to enhance the force counter corruption capability, all of which have been addressed.
4. On 12th February 2012, the Home Secretary, made a statement on her plans to strengthen police integrity, outlining a package of measures. These included the need for the police to become much more transparent in their business, with clearer rules for how officers should conduct themselves. In addition, The Independent Police Complaints Commission (IPCC) is to be given the capacity to investigate all serious complaints against the police to assist in the drive against corruption.
5. In September 2013, the ACPO Police Integrity Model was published. The model is an overarching governance model which provides a methodical approach to integrity. It is based upon the principle of 'transparency' in order to gain public trust and confidence and provides a strategic tool for identifying and addressing potential vulnerabilities (Appendix A). HMIC has indicated that they will consider the Police Integrity Model as a template, against which they will examine the governance of corruption and integrity issues.

Current Position

6. The process of developing integrity in the City of London police involves developing and maintaining a professional and respectful workplace. It can only happen if we have ethical leadership, active management supervision and have effective reporting and monitoring processes. In essence, building workplace integrity is about creating a workplace that fosters the development of high professional standards, and demonstrates the values of the organisation. Integrity is one of the key values of the City Futures transformation programme which will be a driver for how the City of London Police staff perform in delivering a service to the City of London. In doing so, it will reinforce and promote an ethical and professional workplace which is an essential safeguard against risks to integrity, including improper conduct, misconduct and corruption.
7. Following discussion and subsequent direction at Police Committee, the Force began work on a strategic plan to improve the management of integrity issues. As a result, the Town Clerk, in consultation with the Chairman of the Police Committee and Members of the Professional Standards and Integrity Sub Committee, agreed on a number of measures to strengthen the Police Committee's monitoring of the Force's data in this area. As a consequence, reports are now submitted quarterly incorporating many of the integrity measures many of which were raised by HMIC in their inspection. To reflect this increased emphasis on integrity, the Complaints and Professional Standards Sub Committee was re-named in April 2013 as the Professional Standards and Integrity Sub Committee.
8. At the same time as the work was being developed between the Force and Police Committee, the College of Policing and the Association of Chief Police Officers (ACPO) began work on a Police Integrity Model and a Police Code of Ethics. The Force has actively engaged with the College to support this work, but in doing so this has slowed progression of our own internal work. This has however, ensured consistency with the development of both the national pieces of work. At this stage, the Police Integrity Model has been published with the Code of Ethics still undergoing consultation.

Integrity Statement

9. The cornerstone in developing standards of integrity within the City of London Police is the publishing of an integrity statement. This statement of integrity provides an overarching declaration that informs policies and procedures regarding conduct, enforcement, and accountability. This statement forms part of City Futures Values (Appendix B) and incorporates the integrity statement from the Police Integrity Model.

10. Although the statement plays an important role in shaping integrity in the workplace and setting the right tone for staff, in order to fully embed it within the Force, it requires monitoring measures that will reassure both ourselves and our stakeholders that we are an organisation that acts with integrity.

Monitoring

11. The Police Integrity Model gives guidance on distinct areas that a force should consider in relation to Integrity. These areas are:
 - **Commit** to an Integrity Programme “from the top”
 - **Assess** the current status and risk environment
 - **Plan** the integrity programme
 - **Act** on the plan
 - **Monitor** controls and process
 - **Report** internally and externally on the programme
12. Within each of the above there is guidance that provides a framework and bespoke actions. The completion of these actions will ensure that the Force has process and governance to demonstrate it is an organisation with integrity at its heart. The chair of the Professional Standards and Integrity Sub Committee has been instrumental in developing this plan and has provided valuable feedback in her regular meetings with the Head of Professional Standards and an earlier draft was presented at the Professional Standards and Integrity Sub Committee for comment and feedback on the 13th November 2013. A strategic overview is attached at Appendix C.
13. Within the plan is a suite of measures displayed as a dashboard that can give a “health check” on the organisation. This will allow the Force to take action should a pattern of behaviour be detected that requires further analysis or investigation. The areas to be measured include those that are viewed as high risk, some of which were highlighted in the HMIC “Without Fear or Favour” Inspection. These include: use of force mobile telephones, use of corporate credit card and transactions, expenses claims, business interests, media contacts, information security, gifts and hospitality, vetting refusals and crime data integrity. In addition, areas such as grievances, employment tribunals and victims of crime satisfaction data will also be used as appropriate to inform the dashboard. An initial draft of the dashboard was submitted to the Professional Standards and Integrity Sub Committee on 13th November and in light of the feedback received from Members, the dashboard is being further refined and

will be presented to the next Professional Standards and Integrity Sub Committee in January 2014.

Governance

14. The delivery plan is the initial step in the further development of integrity within the Force. In order that the plan is embedded, it is essential that there is a stringent governance process. In consultation with the Town Clerk's Department, the Force has adapted the guidance on the National Police Integrity Model to reflect the governance within the City of London. The Professional Standards and Integrity Sub Committee will continue to perform the independent scrutiny role and will receive quarterly reports from the Force Organisational Learning Forum (OLF) which is chaired by the Assistant Commissioner and will be accountable for the overall delivery of the plan. The OLF will receive regular reports from the new Integrity Monitoring Board chaired by the Superintendent Professional Standards, whose role it is to carry out the regular monitoring of the areas of high risk shown on the dashboard, and in line with the Professional Standards Strategic Assessment.
15. It is proposed that a member of Professional Standards and Integrity Sub Committee will sit on this new Integrity Monitoring Board. (There is already a Professional Standards Working Group which reports in to OLF, which looks at professional standards for operational policing delivery. Deputy Nash attends this group as Lead Member in this area). In addition, Strategic Management Board chaired by the Commissioner will receive bi-annual reports from the new Integrity Monitoring Board. The role of the Independent Advisory Group (IAG) in supporting independent scrutiny is currently being discussed with its' members. The governance structure flow chart is attached at Appendix D.

Conclusion

16. This report shows that the City of London Police, in cognisance of both the local and national picture has taken steps to ensure that we have appropriate measures in place to deal with Police integrity issues .The development of an integrity statement forming part of City Futures along with an integrity action plan and monitoring dashboard will allow the Force to demonstrate its commitment to identify any potential integrity concerns and to proactively manage these in the workplace. The scrutiny and governance by the Police Committee, through the structure outlined in the report, will provide an element of independent oversight that will only strengthen the mechanisms to ensure the City of London Police is a Force that acts with integrity.

Background Papers:

Appendices

Appendix A The Police Integrity Model

Appendix B City of London Police Integrity Statement

Appendix C The Police Integrity Model Action Plan

Appendix D Governance Structure

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