

<b>Committee(s):</b>	<b>Date(s):</b>
Police: Performance and Resource Management Sub Committee	18 <sup>th</sup> March 2015
<b>Subject:</b> HMIC Inspection Update	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 16/15	<b>For Information</b>

### **Summary**

This report provides your Sub-Committee with an overview of the City of London Police response to Her Majesty's Inspectorate of Constabulary's (HMIC) continuing programme of inspections and published reports. Since the previous report to your Sub-Committee HMIC has published its first 'Interim' Police Effectiveness, Efficiency and Legitimacy (PEEL) Assessment, the City of London Police specific report on "Police Integrity and Corruption", and the Integrity Matters report, the national thematic inspection into Police Integrity and Corruption. The report is supported by Appendix A which provides details of progress against all outstanding HMIC recommendations.

**PEEL:** the Force received an overall assessment of GOOD. HMIC stated the available evidence indicated that:

- in terms of its effectiveness, the force is good at reducing crime and preventing offending, good at investigating offending and good at tackling anti-social behaviour;
- the efficiency with which the force carries out its responsibilities is good; and
- the force is acting to achieve fairness and legitimacy in most of the practices that were examined this year.

No additional recommendations were made.

#### **Police Integrity and Corruption: City of London Police Report**

HMIC found the Force has made progress since the 2012 HMIC inspection, stating that the Commissioner and his chief officer team set high standards in terms of conduct and behaviour and other senior leaders understand their responsibilities to maintain and promote these standards throughout the Force. HMIC found that unethical and unprofessional behaviour was appropriately challenged and that officers are aware of their own individual responsibility. They also found that the Force actively and effectively identifies and manages threat, risk and harm from corruption.

HMIC made only 4 recommendations for improvement, three of which have been implemented and one is being managed by the Force; all the

recommendations are included in Appendix A to this report.

**Integrity Matters:** National Report on Police Integrity and Corruption providing a comprehensive summary and evaluation of how all 43 forces deal with :

- Discovering, investigating and tackling wrongdoing;
- Misconduct and corruption;
- Leaders creating an ethical culture;
- Policies and practices to promote integrity;
- Anti-corruption systems and processes.

The report makes 14 recommendations that are included in Appendix A to this report.

### **Recommendation**

Members are asked to receive this report and note its contents.

## **Main Report**

1. This report provides your Sub-Committee with an overview of the City of London Police response to Her Majesty's Inspectorate of Constabulary's (HMIC) continuing programme of inspections and published reports. Since the previous report to your Sub-Committee HMIC has published its first 'Interim' Police Effectiveness, Efficiency and Legitimacy (PEEL) Assessment (19<sup>th</sup> November 2014), the City of London Police specific report on "Police Integrity and Corruption", which was published on 27<sup>th</sup> November 2014 and the Integrity Matters report, the national thematic inspection into Police Integrity and Corruption that was published on 30<sup>th</sup> January 2015. The report is supported by Appendix A which provides details of progress against all outstanding HMIC recommendations

### **Police Effectiveness, Efficiency and Legitimacy (PEEL) Interim Assessment**

2. The PEEL assessment provides a broad assessment of policing over the three pillars of effectiveness, efficiency and legitimacy. Every inspection conducted by HMIC during 2014 has in some way contributed to the evidence for the gradings received. For example, the Valuing the Police Inspection has informed the Efficiency Pillar, the Interim Crime Inspection and the Strategic Policing Requirement Inspections both informed the effectiveness pillar, and the Crime Data Integrity Inspection and Police Corruption and Integrity Inspection both informed the assessment against the Legitimacy pillar.
3. HMIC labelled the first assessment as interim because it was based on an incomplete set of inspections. However, HMIC felt that there was sufficient evidence to publish the interim assessment. All inspections to be carried out during 2015 will inform the first full PEEL assessment, which HMIC has indicated will not be published until February 2016.

4. The assessment is web-based only, with no hard copy reports being published. The top level questions used by HMIC are used to assess how well the Force:
  - carries out its responsibilities including cutting crime, protecting the vulnerable, tackling antisocial behaviour, dealing with emergencies and other calls for service (*effectiveness*);
  - provides value for money (*efficiency*); and
  - operates fairly, ethically and within the law (*legitimacy*).
5. The website presents a high level narrative judgement for each pillar together with an overall assessment of the Force based on the HMI's professional judgement. Readers are directed to individual inspection reports for detailed findings.
6. The Force received an overall assessment of GOOD. HMIC stated the available evidence indicated that:
  - in terms of its effectiveness, the force is good at reducing crime and preventing offending, good at investigating offending and good at tackling anti-social behaviour;
  - the efficiency with which the force carries out its responsibilities is good; and
  - the force is acting to achieve fairness and legitimacy in most of the practices that were examined this year.
7. The PEEL assessment has not made any additional recommendations to those that have already been made by individual inspections and which your Sub Committee is made aware of quarterly.

### **Police Integrity and Corruption**

8. The *Police Integrity and Corruption* report is the third in a series that began in 2011 when HMIC was formally commissioned by the Home Secretary to consider instances of undue influence, inappropriate contractual arrangements and other abuses of power in police relationships with the media and other parties. The report summarises the City of London Police position. The national position was reported in the Integrity Matters report published on the 30<sup>th</sup> January 2015 and detailed at paragraph 16.
9. The inspection that resulted in the report looked at 4 principal areas:
  - Forces' progress on managing professional and personal relationships with integrity and transparency, since the 2012 inspection;
  - Forces' progress in communicating and making sure staff know about ethical and professional behaviour, including the Code of Ethics;

- How well forces proactively look for, and effectively challenge and investigate misconduct and unprofessional behaviour; and
- How well forces prevent, identify and investigate corruption.

The findings for each of those areas are considered in detail immediately below.

10. Overall, HMIC found that the Force had made good progress on the 3 areas for improvement identified in the 2012 report.

- i. The previous inspection had found there was no monitoring in place to cross-reference contract and procurement registers with the gifts and hospitality register to ensure the integrity of the procurement process. HMIC notes that the finance department now manages the use of all corporate credit and procurement cards and refers management information and any suspicious spending to the professional standards department (PSD). Additionally, there is a system of checking in place for the issue and use of corporate credit cards, which relies upon line manager authorisation. HMIC found all suspicious transactions would be referred to the PSD. They also noted the City of London Corporation had conducted a spot check of corporate procurement cards.
- ii. Second jobs and business interests - the 2012 inspection HMIC found no policy in relation to those seeking secondary employment, and no review mechanism for those with secondary employment. That had been remedied and HMIC were content that appropriate policies were now in place and all applications have to be assessed and approved by the PSD, with all registered second jobs subject to an annual review.
- iii. Integrity training - the 2012 inspection found the PSD only provided new recruits with information about the appropriate use of social media. HMIC found that this had improved with significant changes to policy now being communicated to staff via email, intranet systems and posters placed in police stations. They noted also that information about public complaints and discipline cases (called 'lessons learnt') is circulated to highlight integrity-related issues.

11. HMIC found that the Force had made good progress in making sure officers understand values and professional behaviour across the organisation. They found the Commissioner and his chief officer team set high standards in terms of conduct and behaviour and other senior leaders understand their responsibilities to maintain and promote these standards throughout the Force.

12. Whilst HMIC found strong examples of officers challenging and reporting unprofessional behaviour, they also found some evidence of reluctance amongst a limited number of officers to report wrongdoing. Although very much a minority view, HMIC concluded the reason was that there was a

perception that as the Force is a small organisation, to take such action could impair career prospects. The Force has taken all reasonable steps to ensure that this is not the case, including publicising options to report wrongdoing anonymously.

13. HMIC state in the report that officers and staff are aware of the boundaries of professional behaviour and understand how it affects both the public and their colleagues. They note the positive impact being made to reinforcing professional boundaries through a programme of workshops on integrity and professional standards. They also commented positively on the Force's mandatory e-learning training package ensuring staff had read and understood the Code of Ethics.
14. Whilst HMIC found that the Force actively and effectively identifies and manages threat, risk and harm from corruption, taking all reasonable steps to ensure that organised crime investigations are not compromised, they did feel there were insufficient resources within the counter-corruption unit (CCU) to deal effectively with the flow of intelligence.
15. The Force acknowledged this at the time of the inspection, and has instigated a programme which will improve the CCU's capacity and capability in this area.
16. HMIC only recommended 4 areas for improvement, which are included in Appendix A to this report.

### **Integrity Matters: National Report on Police Integrity and Corruption**

17. The background that led to the publication of the national thematic report is as detailed at paragraph 8. It is a comprehensive assessment of the national position; the complexity of summarising an evaluation of 43 forces has resulted in a report that is split into discrete sections, each with their own methodologies, findings and conclusions. Those sections cover:
  - Discovering, investigating and tackling wrongdoing;
  - Misconduct and corruption;
  - Revisiting police relationships;
  - Role of leadership in creating ethical culture;
  - Policies and practices to promote integrity;
  - Anti-corruption systems and processes;
  - Capacity and capability of professional standards departments and anti-corruption units.
18. Each of those areas were considered as part of the City of London Police's inspection and in the Force-specific report detailed at paragraphs 7 – 14. HMIC's principal findings nationally were:

- In general, it is clear that the arrangements that forces have in place are in appreciably better shape than when the first reviews into this area were conducted in 2011 and 2012. Over the course of those inspections, a total of 125 areas for further improvement were identified; the current inspection found that progress has been made in 122 of those areas, although some forces had made more progress than others.<sup>1</sup>
- Chief officers are taking seriously issues of police integrity and making tangible progress in creating an ethical culture (chiefly through embedding the Police Code of Ethics).
- Forces are using a wide range of structures and resourcing models for the professional standards and anticorruption departments; they did not consider any one model better than another, recognising that they often reflected local circumstances.
- Despite progress being made in forces having systems in place to report concerns about integrity-related issues, more needs to be done, particularly in developing a sense of trust amongst staff to use the mechanisms available.
- Forces should have the structures and resources in place to proactively look for threats, risks and trends on misconduct and corruption issues.

19. The report makes 14 recommendations, details of which are contained in Appendix A.

## **Appendix**

20. Appendix A provides a position statement on progress against all HMIC recommendations. Those recommendations that have been implemented and are GREEN and which have previously been reported to Members are not included as agreed with Members at your last Sub Committee.

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<sup>1</sup> Forces making particularly good or particularly poor progress are not named in the report but would be indicated by the number and range of recommendations made in their force-specific reports. City of London Police only received 4 recommendations for further improvement.