

<b>Committee(s):</b>	<b>Date(s):</b>
Police:Performance and Resource Management Sub Committee	23 <sup>rd</sup> February 2017
<b>Subject:</b> HMIC Inspection Update	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 13-17	<b>For Information</b>

### Summary

This report provides Members with an overview of activity undertaken within the last reporting period since your November Sub Committee in response to the reports published by Her Majesty's Inspectorate of Constabulary (HMIC). Progress against existing recommendations is provided for Members' information as well as an overview of the Inspection programme.

### Reports published

Three reports have been published:

PEEL Leadership (not graded, 2 areas for further improvement identified)

PEEL Legitimacy, City of London report (graded GOOD, 5 areas for further improvement identified)

PEEL Legitimacy, National report (3 recommendations)

### Inspections Completed Since Last Report

There have been no inspections during the last reporting period.

The Force submitted a data return for the Modern Slavery Inspection during this period. This is a national, risk based thematic inspection; the Force has not been chosen for inspection as part of the fieldwork.

**Inspections Due During Next Period:** The PEEL Spring Legitimacy and Efficiency Inspections will start from February and March 2017. To date the Force has no confirmation on the exact timescale for the visit but anticipates the data requests for these inspections to arrive in the months stated above.

The Force may also be subjected to the Crime Data Integrity and Custody Inspections, both of which are rolling unannounced inspection programmes so no date for inspection is available.

**Reports Due for Publication:** The Force has received an initial draft of its Effectiveness Report. This has not yet been formally finalised or published. A full overview will be presented to your next Sub Committee following publication.

### HMIC Recommendations Overview:

Appendix A to this report contains progress against the recommendations from

all live inspection action plans. These are summarised in the table below:

Report	Number of open recommendations and status
PEEL: Police Leadership 2016 - CoLP	2 Amber
PEEL: Police Legitimacy 2016 – National	3 Amber 2 new green actions for this period
PEEL: Police Legitimacy 2016 - CoLP	5 Amber
PEEL: Police Efficiency 2016 – CoLP	5 Amber 1 new green action for this period
Delivering Justice in the digital age	1 Red
The tri-service review of joint emergency services interoperability principles	2 Amber 2 new green for this period completing this area.
PEEL: Police Effectiveness 2015 – CoLP	1 Red 1 new green for this period completing this area.
Increasingly everyone's business	1 new green for this period completing this area.
The depths of dishonour: Hidden voices and shameful crimes	1 Red
Regional Organised Crime Units	1 White 1 new green for this period completing this area.
PEEL: Police Efficiency 2015 - CoLP	1 Red 1 new green for this period completing this area.
In harm's way: The role of the police in keeping children safe	1 Red

Recommendation Summary	Number
New Green	9
Amber	17
Red	5
White	1
Total Amber/Red/White Recommendations	23

## Recommendation

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

### Main Report

1. This report provides Members 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 last report to your Sub Committee there have been three new HMIC reports published that impact on the Force. Progress with existing recommendations as well as the current inspection programme is provided below for your reference.

### New reports

#### Leadership

2. On 8<sup>th</sup> December 2016 HMIC published its PEEL Police Leadership 2016 report alongside individual force reports. No gradings were given but forces received an array of Areas for Improvement (AFIs) ranging in number between 0 and 4. Over a third of forces (16) received no AFIs and 4% (2) received 4 AFIs. City of London Police received 2 AFIs.
3. The summary of findings for the City of London Police is as follows:

#### *Understanding Leadership*

- Works closely and effectively with its workforce to set out what it expects from its leaders at all levels of organisation.
- Leadership expectations are well understood by the workforce (noting less so at Constable and equivalent ranks but this was due to training not yet being attended).
- Does not have systematic oversight and understanding of workforce capabilities and leadership skills (but noting already working to address).
- Recording of workforce capability does not extend beyond skills and qualifications as opposed to including details of leadership capability.
- Only limited evidence available of how effective staff sensing surveys had been in developing understanding of views about leaders in force.

#### *Developing Leadership*

- Uses a variety of techniques to develop potential leaders (coaching, 360° feedback and mentoring)
- Has made good use of proximity to major financial institutions to recruit volunteers to bring in additional skills (e.g. for combating complex fraud or cyber enabled crime).
- No formal processes for responding to leadership problems (but Force is confident that it could respond promptly).
- No meaningful analysis of how effective tools of development used are or how used to address particular gaps in leadership.
- Lack of full knowledge across workforce of talent scheme and what it aims to achieve.
- Needs to be clearer link between understanding of leadership capabilities and how recruitment might be used to address.
- Does not assess how effective training and development is at improving the skills of its staff.

#### *Displaying Leadership*

- Has an open culture that encourages challenge.

- Innovate Scheme is popular and has linked scheme to a way of developing leaders.
  - as good understanding of diversity which extends beyond protected characteristics and takes account of background, experience and skills to strengthen teams. H
4. The adverse comments resulted in the following two areas for improvement (AFI) being identified:
- AFI 1 - City of London Police should evaluate its leadership programme and talent management schemes to ensure a structured, comprehensive and transparent approach so it can identify and develop potential leaders.
- AFI 2 - City of London Police should introduce a way of identifying and developing talented officers and staff in a consistent way across the workforce, making sure that the available schemes are communicated effectively.
5. Both AFIs are being progressed, details appear in Appendix A.

## Legitimacy

6. On 8<sup>th</sup> December 2016 HMIC also published its PEEL Legitimacy 2016 report alongside individual force reports for England and Wales.
7. HMIC overall gradings are as follows:
- 2 forces graded as Outstanding (Derbyshire and Kent)
  - 36 forces graded as Good (including City of London Police)
  - 5 forces graded as Requires Improvement (Cleveland, Dyfed Powys, Gloucestershire, North Wales and South Yorkshire)
  - No forces graded as Inadequate
8. In comparing overall gradings with those of 2015, 4 forces improved their gradings, 36 received the same grade (including City of London Police) and 3 forces' gradings were reduced.
9. As well as each force being given an overall judgment grading, forces were also given gradings against each of the three inspection questions. Separate gradings for each inspection area for all forces are as follows:

### *Extent to which the force treats people serves with fairness and respect*

Outstanding	2 forces	Derbyshire, Kent
Good	38 forces	inc CoLP
Requires Improvement	3 forces	

### *Extent to which the workforce behaves ethically and lawfully*

Outstanding	1 force	Derbyshire
Good	27 forces	inc CoLP
Requires Improvement	15 forces	

*Extent to which the force treats workforce with fairness and respect*

Outstanding	3 forces	Durham, Kent, Wiltshire
Good	28 forces	
Requires Improvement	12 forces	inc CoLP

No force achieved an 'Outstanding' judgment grading against all 3 areas

10. The City of London Police received an overall judgment grading of **GOOD**. The Force findings are summarised below:

*To what extent does the force treat all the people it serves with fairness and respect?*

- The Force is good at treating all the people it serves with fairness and respect and engages well with its communities and has a good understanding of the different communities and people within the City.
- Could do more to develop its understanding of the issues that have the greatest impact on public perceptions of fair and respectful treatment
- Public surveys conducted to date do not specifically deal with the issue of treatment.
- Communication feedback (e.g., use of social media) is in the main only one way and force should do more to demonstrate to public that it has acted on feedback.
- Communications strategy needs to include consideration as to how communities are made aware of response to feedback / challenge and what action if any has been taken.

*To what extent the Force ensures workforce behaves ethically and lawfully?*

- Has developed and maintained an ethical culture and effectively identifies integrity by robust and frequent monitoring of its staff
- Uses a range of methods to identify the areas that have the greatest effect on workforce perceptions of fair and respectful
- Force Vetting Policy is comprehensive and complies with national vetting guidance (*therefore compliance with national report recommendation 1 can be met*)
- Does not monitor ethnicity or UK national status of applicants who fail vetting checks so cannot demonstrate it understands the extent to which vetting process may affect recruitment of a diverse workforce
- Should develop its counter-corruption strategy to meet the threats the force has identified. (*Development of strategy which identifies risks to integrity based on local information is noted as having commenced but not yet completed*)
- Only at early stages of understanding seriousness of abuse of authority for sexual gain and has not undertaken any activity to raise awareness among wider workforce

- Should improve its approach to identifying staff who seek to abuse their authority for sexual gain (first step being to recognise it as serious corruption within its anti corruption control strategy)

*To what extent treats workforce with fairness and respect?*

- Could do more to demonstrate how it has responded to staff concerns
- Immediate line managers often unaware of welfare indicators or emerging issues although are provided to senior managers
- Concern wellbeing identification training not provided to line managers (although looking to address in next 6 – 12 months)
- Do more to demonstrate that performance assessment is fair and effective with central oversight
- Link between talent spotting arrangements and PDR processes not obvious
- No evidence that force monitors the effectiveness and fairness of PDR reviews by ethnicity, gender, role, rank.

11. These findings (which resulted in 5 AFIs contained within Appendix A) are now being progressed via action plans being managed in Force.

### **Inspections Completed Since Last Report**

12. There have been no formal inspections during the last reporting period. The PEEL Effectiveness inspection that completed in October, as detailed within the previous report, was the last inspection to have taken place to date.
13. The Force submitted a data return for the Modern Slavery Inspection during this period. This is a national inspection and the Force was not chosen as a participation Force for this inspection process.

### **Inspections Due During Next Period**

14. The PEEL Spring Legitimacy and Efficiency Inspections will start from February and March 2017. To date the Force has no confirmation on the exact timescale for the visit but anticipates the data requests for these inspections to arrive in the months stated above.
15. The Force may also be subjected to the Crime Data Integrity and Custody Inspections these are rolling unannounced inspection programmes so no defined date for inspection is available.
16. Work has progressed to prepare for both of these inspections with the Force working on a Crime Data Integrity Action Plan to identify and address areas of weakness.
17. The Force is also undertaking a self assessment exercise in preparation for the Custody inspection with this process running over January and February so that areas of weakness can be identified and addressed.

## Reports Due for Publication

18. HMIC are due to publish their PEEL Effectiveness Reports in March 2017. As previously stated within the report the Force has had sight of its draft report in this area and will be awaiting final review and moderation before publication.

## Current status of HMIC Recommendations

19. There are 12 current HMIC reports being managed by the Force that contain recommendations that have yet to be completed. The current status of these recommendations is summarised in the table below:

**Current Status of HMIC Recommendations Summary**

Recommendation Summary	Number
New Green	9
Amber	17
Red	5
White	1
Total Amber/Red/White Recommendations	23

20. The full status of all recommendations is provided for oversight within Appendix A to this report. There are currently only 25 recommendations that remain open and being worked on by the Force, this includes the 15 new recommendations from the 2016 PEEL process that now form part of Force monitoring.

## Recommendations Completed Since Last Update

21. The Force has completed the following recommendations and actions linked to outstanding HMIC reports. All outstanding recommendations are attached at Appendix A.

- i. **PEEL: Police Legitimacy 2016 - National:** The Force has completed the first action linked to recommendation 1 of this report and ensured it is fully compliant with national vetting policy. In addition the Force has completed an action against recommendation 2 of this report ensuring that effective procedures are in place to identify future allegations and make appropriate referrals to the IPCC around any allegations of abuse of authority for sexual gain.
- ii. **PEEL: Police Efficiency 2016:** The Force has completed one action around recommendation 1 completing the final draft of the Force Workforce Plan which will be further developed and evolve over time.
- iii. **The tri-service review of the joint emergency services interoperability principles:** Recommendation 2 and 4 of this

report have been completed. Future training needs will be informed by developments on future capability demand in the Force Workforce Plan and specific training on Airwave capability is to be included in the training plan going forward.

- iv. **PEEL: Police Effectiveness 2015 – CoLP:** Recommendation 1 of this report has been completed. A process for managing repeat offenders has been agreed with the Metropolitan Police Service (MPS).
- v. **Increasingly everyone's business:** Recommendation 4 of this report has now been completed. The final element is the production and presentation of a performance dashboard at the Vulnerability Working Group on the 14<sup>th</sup> February 2017.
- vi. **Regional Organised Crime Units:** Recommendation 8 of this report has been completed. A common approach has been established with the MPS and is being formalised into a Memorandum of Understanding.
- vii. **PEEL: Police Efficiency 2015 – CoLP:** Recommendation 1 has been completed with the production of the final draft of the Workforce Plan.

### **Force Management Statements**

- 22. At the meeting of your Sub Committee on 30<sup>th</sup> November 2016, the Chairman also requested an update on Force Management Statements to be included in this update report.
- 23. Sir Tom Winsor introduced the concept of the Force Management Statement (FMS) over two years ago, mandating that Forces should produce a FMS annually from 2016. That position was dependent on HMIC producing guidance and a template for forces' use, which has never materialised. Various proposals have been put forward informally by HMIC, none of which have been progressed. The latest proposal (which is still to be formally approved by Sir Tom) is likely to be accepted, resulting in a requirement that the first draft statements will be produced by October 2017.
- 24. The City of London Police signed up to be a pilot force for FMS and has therefore been engaged with HMIC at each stage of the process. Throughout February 2017, the Head of Strategic Development is attending a series of workshops, the aim of which is to produce a draft FMS by the end of March 2017, significantly ahead of other forces who are not part of the pilot. This is partially to provide Sir Tom with an opportunity of referring to the drafts in his annual state of policing report in April. HMIC have appointed a reputable consultancy company to draft the guidance, which is currently being tested by the pilot forces through the working groups.



25. The current proposed format of the statements will be broken down into a number of chapters. Each chapter will concentrate on a particular area of policing (investigation, prevention, major events and so on), taking into account the current demand in that area, and likely future demand in 1 and 3 year's time. For each area assessed, there will be narrative about the force's capacity and capability to meet current and future demand, skills deficits, specific IT needs, the condition of assets in that area and so on. A financial assessment for each area should also be made. It is intended that forces use this information to make strategic decisions around expenditure and resourcing over the medium term, which should also be recorded in the statement. When in place, HMIC will use the statements as a source of information for their inspections. It is proposed that the statements will be public, however, given that some areas might be sensitive, it is accepted that forces will have the right to redact elements of the FMS. The guidance that is being drafted is likely to provide more information about this.

**Appendix A:** Full list of HMIC Recommendations currently being implemented within Force.

**Contact:**

**Stuart Phoenix**

Strategic Development - T: 020 7601 2213

E: [Stuart.Phoenix@cityoflondon.pnn.police.uk](mailto:Stuart.Phoenix@cityoflondon.pnn.police.uk)