

Committee(s): Police: Professional Standards and Integrity Sub Committee	Date: 1 st March 2017
Subject: HMIC PEEL Inspection – Police Legitimacy 2016 National and City of London Police Reports	Public
Report of: Commissioner of Police	For Information
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Summary

The Force was inspected under Her Majesties Inspectorate of Constabulary (HMIC) PEEL¹ Inspection Programme for the Legitimacy element in June 2016. A national inspection was also conducted. The results of the national and force inspections were published on the 8th December 2016.

The City of London Police was graded overall as **GOOD** with judgements as follows for each of the three inspection criteria:

- Extent treats people serves with fairness and respect **GOOD**
- Extent workforce behaves ethically and lawfully **GOOD**
- Extent treats workforce with fairness and respect **REQUIRES IMPROVEMENT**

5 Force specific Areas for Improvement (AFIs) were identified-

AFIs

1. The Force should improve how it demonstrates that it has taken action to improve how it treats all the people it serves.
2. Annually, the Force should produce a counter-corruption strategic assessment and control strategy, to identify risks to the force's integrity.
3. The force should improve how it clarifies and reinforces standards of behaviour to its workforce, in particular when dealing with vulnerable people, including victims of domestic abuse.
4. The force should improve how it identifies and understands its workforce's wellbeing needs.
5. The force should improve how it manages individual performance of its officers and staff.

Additionally, in the national inspection 3 Causes of Concern were identified with 5 supporting recommendations made, which are all applicable to the Force.

The AFIs / national recommendations now form part of the Force HMIC Action Plan report which is monitored monthly at the Force Performance Management Group (PMG) and are also reported as a matter of course and as a standing item quarterly to your Police Performance and Resource Management Sub Committee of which the Chairman, Alderman Gowman, is a Member.

Recommendation

Members are asked to: Note the report.

¹ PEEL Inspections- Police Efficiency Effectiveness and Legitimacy inspections

Main Report

Background

1. The PEEL Inspection programme is the HMIC's annual all-force inspection programme covering forces' effectiveness, efficiency and legitimacy.
2. The Spring PEEL inspection for 2016 considered Legitimacy, Efficiency and Leadership strands of PEEL; this report relates to the part of the inspection that focused on legitimacy. (Efficiency reports / results were considered by SMB in December 2016 and the Leadership element is subject of a separate report to this meeting).
3. Although the question sets for each inspection change from year to year the overall focus as regards legitimacy remains the same:
 - The extent to which forces treat people with fairness and respect,
 - The extent to which forces ensure their workforce acts ethically and lawfully.
 - The extent to which a force's workforce themselves have been treated with fairness and respect.
4. The Force was inspected during w/c 13th June 2016 following data and document collection exercises in March/April along with insight visits conducted throughout the year.
5. The outcomes of the process would result in one of 4 possible graded judgements, outstanding, good, requires improvement and inadequate. (Judgement here is being made against how legitimate the force is at keeping people safe and reducing crime and not an assessment of the overall legitimacy of policing).
6. Forces were graded against three Inspection criteria
 - To what extent do forces treat all the people it serves with fairness and respect?
 - To what extent do forces ensure the workforce behaves ethically and lawfully?
 - To what extent do forces treat the workforce with fairness and respect?

Current Position

City of London Police Report

7. On 8th December 2016 HMIC published its national PEEL Police Legitimacy 2016 report alongside individual force reports for England and Wales. Overall the City of London Police was graded **GOOD**, the same as in 2015.
8. For comparison purposes, HMIC national overall gradings are as follows:

Grading	Forces
Outstanding	2 (Derbyshire and Kent)
Good	36 (including City of London Police)
Requires Improvement	5 (Cleveland, Dyfed Powys, Gloucestershire, North Wales and South Yorkshire)
Inadequate	0

9. As well as each force being given an overall judgement grading, forces were also graded against each of the three inspection questions. The City of London Police gradings were:

- Extent treats people served with fairness and respect **GOOD**
- Extent workforce behaves ethically and lawfully **GOOD**
- Extent treats workforce with fairness and respect **REQUIRES IMPROVEMENT**

10. The detailed Force findings are summarised below:

A. To what extent do forces 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 of London Corporation (CoL).
- The Force 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 the Force should do more to demonstrate to the 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.

B. To what extent ensures workforce behaves ethically and lawfully?

- The Force has developed and maintained an ethical culture and effectively identifies integrity by robust and frequent monitoring of its staff.
- The Force 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 is met*)
- The Force 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.
- The Force 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.)

- The Force is only at early stages of understanding the seriousness of abuse of authority for sexual gain and has not undertaken any activity to raise awareness among wider workforce.
- The Force 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).

C. To what extent treats workforce with fairness and respect?

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

11. The Force report contained 5 Areas for Improvement as follows:

AREAS FOR IMPROVEMENT (AFIs)

AREA FOR IMPROVEMENT 1

The Force should improve how it demonstrates that it has taken action to improve how it treats all the people it serves.

AREA FOR IMPROVEMENT 2

Annually, the Force should produce a counter-corruption strategic assessment and control strategy, to identify risks to the force's integrity.

AREA FOR IMPROVEMENT 3

The Force should improve how it clarifies and reinforces standards of behaviour to its workforce, in particular when dealing with vulnerable people, including victims of domestic abuse.

AREA FOR IMPROVEMENT 4

The Force should improve how it identifies and understands its workforce's wellbeing needs.

AREA FOR IMPROVEMENT 5

The Force should improve how it manages individual performance of its officers and staff.

National Report

12. For Members' information and interest the full national report can be found at: PEEL: Police Legitimacy 2016 Report - A national overview
<http://www.justiceinspectorates.gov.uk/hmic/wp-content/uploads/peel-police-legitimacy-2016.pdf>
13. However, in summary, the national report contained 3 'causes for concern' with a total of 5 recommendations made, all of which are applicable to the City of London Police as they are to every other force.

CAUSE FOR CONCERN

HMIC is concerned that some forces are failing to comply with current national vetting policy. This means that forces are employing individuals who have not undergone even basic vetting checks, which represents a significant risk to the integrity of the organisation.

RECOMMENDATION 1

Within six months (*end June 2017*), all forces not already complying with current national vetting policy should have started to implement a sufficient plan to do so. (Note: City of London Police already complies with this, confirmed in the City-specific report).

RECOMMENDATION 2

Within two years (*end of December 2018*), all members of the police workforce should have received at least the lowest level of vetting clearance for their roles.

CAUSE FOR CONCERN

HMIC is concerned that forces do not always recognise the problem of abuse of authority for sexual gain as a form of serious corruption. This means that this understanding is not always being reflected in the force's IPCC referral decisions, and there is no clear picture of the scale of the problem throughout police forces.

RECOMMENDATION 3

Within three months (*end of March 2017*), all forces should complete a retrospective review of allegations and consider referrals to the IPCC.

RECOMMENDATION 4

Within three months (*end of March 2017*), forces should establish effective procedures to identify all future allegations of abuse of authority for sexual gain as serious corruption matters and make appropriate referrals to the IPCC.

CAUSE FOR CONCERN

HMIC is concerned that some police counter corruption units do not have the capability or capacity to seek intelligence on potential abuse of authority for sexual gain. This means that forces are not able to intervene early to safeguard potential victims and tackle unacceptable and potentially corrupt behaviour.

RECOMMENDATION 5

Within six months (*end June 2017*), all forces should have started to implement a plan to achieve the capability and capacity required to seek intelligence on potential abuse of authority for sexual gain. These plans should include consideration of the technology and resources required to monitor IT systems actively and to build relationships with the individuals and organisations that support vulnerable people.

Corporate & Strategic Implications

14. The majority of the Force specific AFIs and national recommendations fall under the actual remit of the Professional Standards Department (PSD) for delivery, albeit in conjunction with Human Resources and operational Directorates.
15. After formal presentation of the reports at the Force's Strategic Management Board (SMB) in January 2017, these recommendations / areas for improvement now form part of the Force's HMIC Action Plan report. This report is monitored at the Force Performance Management Group (PMG) and is also reported as a standing item quarterly to your Police Performance and Resource Management Sub Committee, of which the Chairman, Alderman Gowman, is a Member.

Conclusion

16. The Force was judged overall as **GOOD** in this inspection but recognises that there are a number of AFIs and will endeavour to deliver on these in the required timeframe.

Appendices

None

Background Papers

PEEL: Police Legitimacy 2016 Report

A national overview

<http://www.justiceinspectors.gov.uk/hmic/wp-content/uploads/peel-police-legitimacy-2016.pdf>

City of London Police – PEEL Police Legitimacy 2016

<http://www.justiceinspectors.gov.uk/hmic/wp-content/uploads/peel-police-legitimacy-2016-city-of-london.pdf>

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