

**RESTRICTED**



**Additional reports:**

**Integrity Standards Board Report &  
Organisational Integrity Dashboard**

**HMIC PEEL Inspection – Police Legitimacy 2016  
National and City of London Police Reports**

**Body Worn Video Cameras**

**Matters arising from the sub-committee meeting of the 2<sup>nd</sup>  
December 2016**

**RESTRICTED**



<b>Committee(s):</b> Professional Standards and Integrity Sub Committee	<b>Date:</b> 1 <sup>st</sup> March 2017
<b>Subject:</b> Integrity Dashboard and Code of Ethics Update	<b>Public</b>
<b>Report of:</b> Commissioner of the City of London Police	<b>For Information</b>
<b>Report author:</b> Stuart Phoenix, Head of Strategic Development	

### Summary

#### *Integrity Standards Board and Dashboard:*

The dashboard presented to your Sub Committee has not yet been considered by the Force Integrity Board due to the date of the meeting being rescheduled to the 15<sup>th</sup> March 2017. The dashboard does not, however, disclose any underlying areas of concern.

#### *Code of Ethics Update:*

The London Police Challenge Forum launched on the 15<sup>th</sup> December and the Force internal panel, which will support the regional forum, met for the first time on 10<sup>th</sup> February 2017. At that meeting the process for submitting ethical dilemmas was agreed together with the methodology of how the group would approach providing feedback to ethical dilemmas.

Additional activities undertaken to embed the Code of Ethics include:

- o Professional Standards Department feeding into the Force strategic process that identifies and thereafter manages principal areas of threat, harm and risk, from a counter corruption and professional behaviour perspective.
- o The development of a 'Professionalism Newsletter' which will highlight best practice and establish acceptable standards of behaviour (due to be launched in late March/early April 2017).
- o An Ethics –themed communications month (February 2017)
- o Changes to Force templates and agendas to support consideration of the Code of Ethics when making decisions.

### Recommendation(s)

Members are asked to note the report.

## **Main Report**

### **Background**

1. Integrity is a key principle of the Police Code of Ethics, published in July 2014. Recognising this, the Force developed an integrity dashboard that brought together a series of indicators across a broad range of activities associated with integrity. The dashboard therefore indicates the extent to which the Force's workforce acts with integrity and is attached for Members' information at Appendix 1.
2. To complement the dashboard and ensure there is a programme of ongoing activities to embed the Police Code of Ethics, the Force developed a Code of Ethics action plan, which is also attached for Members' information at Appendix 2.

### **Current Position**

#### *Integrity Standards Board and Dashboard*

3. An Integrity Standards Board (ISB) was constituted to monitor the dashboard on a quarterly basis and to consider other issues relating to integrity. The board is chaired by the Assistant Commissioner and is attended by the Chairman of your Sub Committee and a representative from the Town Clerk's department. It usually sits shortly before your Sub Committee so that an update can be provided to Members. It was necessary to reschedule the 3<sup>rd</sup> quarter meeting to the 15<sup>th</sup> March 2017 meaning the dashboard that is presented to your Sub Committee for information has not yet been considered by the ISB.
4. The dashboard shows a healthy position for the period 1<sup>st</sup> October to 31<sup>st</sup> December. The volume of matters reported continues to be very low and at this stage there are no underlying issues of concern identified. When the dashboard is considered at the ISB, that group might have additional observations or questions, however, the raw data does not disclose any matters that need to be brought to your Sub Committee's attention.
5. This report would normally also include a summary of discussions that took place at the preceding ISB, as that group has not yet met for the 3<sup>rd</sup> quarter, it follows that no update can be included in this report.

#### *Code of Ethics Update*

6. The London Police Challenge Forum was officially launched on 15<sup>th</sup> December 2016 at the Brompton Oratory by the three founding forces<sup>1</sup>. The Force was represented by the Assistant Commissioner and Detective Chief Superintendent Crime Directorate together with the majority of Force Ethics Associates and a representative of the Town Clerk's Department.

---

<sup>1</sup> City of London Police, Metropolitan Police and British Transport Police.

7. Following the launch, the Force has convened its first meeting of associates where the process to submit ethical dilemmas was agreed. An intranet portal is to be developed which will allow staff to highlight any ethical dilemma. The group will then meet monthly to consider issues submitted. All submissions will be open to view by anyone and structured feedback will be provided following each meeting. It was agreed that each submission would be assessed against the 9 principles of the Police Code of Ethics (enabling the feedback to be specific about any specific principles that are breached) together with an assessment of the impact the scenario potentially has on victims or service delivery (and therefore confidence in policing).
8. Complex issues or those that engender most debate will be fed through to the Regional London Police Challenge Forum for further deliberation. Once the process has been embedded, it is proposed to invite community representatives to meetings to take part in the discussions. The aim of this is to support accountability and demonstrate the Force's transparency at how it is addressing ethical policing.
9. The Police Integrity Implementation Plan attached to this report as Appendix 2 for Members' information also provides details of activities undertaken to further embed the Police Code of Ethics. This includes:
  - a. Professional Standards Department feeding into the Force strategic process that identifies and thereafter manages principal areas of threat, harm and risk, from a counter corruption and professional behaviour perspective.
  - b. The development of a 'Professionalism Newsletter' which will highlight best practice and establish acceptable standards of behaviour (due to be launched in late March/early April 2017).
  - c. An Ethics –themed communications month (February 2017), launched with an article titled 'The only way is Ethics' and supported by articles on the link between leadership and ethics, why individuals want to act as ethics associates and how ethical dilemmas can be submitted to the Internal Ethics Panel.
  - d. The Ethics themed month is being complemented by messages on static electronic screens in corridors and canteens and will be included in the new 'Force cascade' which encourages face to face communication of key messages.
  - e. The impact assessment that accompanies the report template to all Force strategic meetings has been amended to incorporate the 9 principles of the Code of Ethics.
  - f. A standing agenda item has been included on the SMB agenda to prompt the board to consider whether there is a Code of Ethics or victim/service delivery impact to any decisions taken by the Board.

10. As a result of the actions outlined above, indicators 1.5, 1.7, 2.6 and 2.7 have turned from AMBER to GREEN on the implementation plan.

### **Appendices**

- Appendix 1 – Integrity Dashboard
- Appendix 2 – Integrity and Code of Ethics Implementation Plan

**Stuart Phoenix**

Head of Strategic Development

T: 020 7601 2213

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

APPENDIX 1 - Organisational Integrity Dashboard  
Reporting period October to December 2016

Indicator	Previous Years				Grievances				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
1	8	7	7	7	3	5	4	12					
<p>Of the 4 grievances raised during the quarter, 3 were raised in October 2016 and relate to complaints against 1 individual. 1 of these grievances was concluded informally whilst the other 2 concluded in January 2017 with recommendations which have already been instigated. None of the grievances related to integrity issues.</p>													

Indicator	Previous Years				ETs				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
2	4	0	2	0	1	1	0	2					
<p>The number of ETs which cite the Force.</p>													

Indicator	Previous Years				Complaints excluding Action Fraud				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
3	110	60	117	105	23	33	30	86					
<p>There were 30 complaints recorded during the Q3 period and 52 allegations (both excl Action Fraud). Of these 52, the Top 5 National Allegation categories accounted for:- Other assault x 2; Oppressive Conduct/Harassment x 1; Unlawful/unnecessary arrest or detention x 2; Other neglect or failure in duty x 8; Incivility/Impoliteness/ Intolerance x 4.</p>													

**NOT PROTECTIVELY MARKED - NO DESCRIPTOR**

Indicator 4	Previous Years					Civil Cases				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016		The number of Civil case which cite the Force				Qtr1	Qtr2	Qtr3	Qtr4	Total
	20	14	24	23		1	8	3		12				

There were 3 civil cases recorded during Q3:

- 1 case with claim for Assault/Battery; False Imprisonment; Mifeasance; Negligence; Slander/Libel/ Defamation.
- 1 case with claim for Mifeasance and Racial Discrimination.
- 1 case with application for Judicial Review (relating to Action Fraud issue and advice given around other avenues of resoution)

Indicator 5	Previous Years					Force Mobile Telephones				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016		Investigations resulting from monitoring of Irregular mobile phone use				Qtr1	Qtr2	Qtr3	Qtr4	Total
	0	0	0	0		1	0	0		1				

Monitoring over Quarter 3 has not led to any investigations over the quarter.

Indicator 6	Previous Years					Corporate Credit Card Transactions				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016		Irregular credit card use/transactions are monitored				Qtr1	Qtr2	Qtr3	Qtr4	Total
		0	1	5		4	14	0		18				

Data not available for 2012/2013 - not recorded

There were 3 separate monitoring exercises during quarter 3, none of which required further assessment.

**NOT PROTECTIVELY MARKED - NO DESCRIPTOR**



**NOT PROTECTIVELY MARKED - NO DESCRIPTOR**

Indicator 7	Use of Force Forms					Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	Qtr1	Qtr2	Qtr3	Qtr4	Total
	1	3	13			4	2			6

Data not available for 2012/2013

Mobile tablet devices are now being used to record instances of use of force. Professional Standard staff are receiving training to facilitate direct access to this system which will enhance analysis from the current position. During the 3rd quarter 2 allegations of 'Other Assaults' were recorded:

- 1) The complainant was arrested at his place of work after a tip-off that he was intending to bomb the premises. The tip-off was subsequently assessed as malicious and the complainant was treated as a witness who was asked to assist with identifying the perpetrator. However, the complainant's solicitors are alleging that the complainant was assaulted at the time of the arrest.
- 2) The complainant alleges that when he was searched, force was used when handcuffed to the rear upon arrest and he was subsequently taken into custody and strip searched.

Indicator 8	Expenses Claims					Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	Qtr1	Qtr2	Qtr3	Qtr4	Total
	0	1	2			0	0	0		0

Data not available for 2012/2013

No monitoring or further assessments undertaken in Q3

Indicator 9	Business Interests Analysed-Police					Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	Qtr1	Qtr2	Qtr3	Qtr4	Total
	1	3	1			4	1	0		5

Data not available for 2012/2013

There were 8 Business Interests recorded in Q3 for Police Officers - 2 x Sales; 1 each x Taxi Driver; Freelance art and design; Fitness instructor; Rental Property; Supply of goods or services; Entertainment/Performing.

There is currently 1 ongoing business interest investigation in progress, first reported in the quarter 2 ISB dashboard 2016/2017.

There are a total of 101 live Business Interests declared (both officers and civilian).

**NOT PROTECTIVELY MARKED - NO DESCRIPTOR**

Indicator 10	Previous Years				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
		0	0	0	0	0	0	0	0

Data not available for 2012/2013

**Business Interests Analysed-Civilian**  
Business interests are monitored

There were 2 Business Interests recorded in Q3 for Civilian Staff -1 x bar staff member and football coach volunteer and 1 x Lodger at home address. No investigations in the 3rd quarter relating to civilian staff.

There are a total of 101 Live Business Interests declared (both officers and civilian).

Indicator 11	Previous Years				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
		0	2	0	1	0	1		2

Data not available for 2012/2013

**Media Contacts**  
Unregistered Col.P Media contacts detected by Corp Comms and reported to PSD.

There was 1 investigation during the quarter 3 period.

Indicator 12	Previous Years				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	Qtr1	Qtr2	Qtr3	Qtr4	Total
		1	1	2	0	0	0	0	0

Data not available for 2012/2013

**Information Security**  
Dip sample 1% of daily PNC checks  
Dip sample 1% of daily PND checks

No investigations in quarter 3 which related to breaches of PNC or PND security.

**NOT PROTECTIVELY MARKED - NO DESCRIPTOR**

Indicator	Previous Years					Gifts and Hospitality				
	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	Analysis of gifts and hospitality register and cross referencing to other sources.				
	0	5	3			Qtr1	Qtr2	Qtr3	Qtr4	Total
13						4	0	2		6

Data not available for 2012/2013

There were 10 separate monitoring exercises during quarter 3 - 2 of which required further assessment. As at 3rd January 2017 there were 165 Gifts and Hospitality submissions recorded during Quarter 3. 110 were showing as accepted, 32 as declined. Of the 165, 74 related to NPCC.

Of the 165, 47 showed neither a Line Manager nor Directorate Head approval/decision/authorisation.

Indicator	Previous Years					Re - Vetting				
	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	Management of issues arising from re-vetting of the workforce				
				0		Qtr1	Qtr2	Qtr3	Qtr4	Total
14						0	0	0		0

During the period of Q3 there were no vetting management issues arising from current employees being re-vetting.

There were 33 refusals from external applicants, mainly due to honesty/integrity or financial concerns. There were a total of 255 new vetting applications received during Q3, with 246 applications being completed, and 297 still pending at the close of the quarter.

Indicator	Previous Years					Procurement				
	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	The number of assessed products by PSD for further investigation				
	0	0	0	2		Qtr1	Qtr2	Qtr3	Qtr4	Total
15						0	0	1		1

Data not available for 2012/2013

1 investigation relating to issues of Conflict of Interest and Procurement.

**NOT PROTECTIVELY MARKED - NO DESCRIPTOR**

Indicator 16	Previous Years				Drug Testing				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	Positive results from testing with cause and random testing				Qtr1	Qtr2	Qtr3	Qtr4	Total
				0	0	0	0	0	0	0	0	0	0

No 'with cause' testing was required during the 3rd quarter. Random drug testing has recommenced in January 2017.

Indicator 17	Previous Years				Sponsorship				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	Dashboard metrics to be developed following approval and dissemination of the Force.SOP.				Qtr1	Qtr2	Qtr3	Qtr4	Total

Dashboard metrics to be developed following approval and dissemination of the Force SOP.  
 A draft Sponcership SOP is being developed by Finance in consultation with Professional Standards. Strategic Development has obtained 4 current policies from other forces to assist in the development of the Force's own. The policy is due to be approved during Quarter 4.

Indicator 18	Previous Years				CAD Closures				Current Year				
	2012/2013	2013/2014	2014/2015	2015/2016	Dip sample of 30 records per month and report findings. Metric reflects records which could/do highlight integrity issues.				Qtr1	Qtr2	Qtr3	Qtr4	Total
									1	0	0	0	1

Monthly dip samples have been completed for October, November and December 2016. Pass rates have improved over this period from 76.7% to 86.6% and failures are being addressed via training - no possible issues of integrity have been identified for this period.  
 Referring to the possible integrity instance recorded in the 2nd quarter [above] - explanation has now been received from the officers involved and it is clear this was a matter of ambiguity and misunderstanding of Home Office Crime Recording rules [shoplifting].

**NOT PROTECTIVELY MARKED - NO DESCRIPTOR**