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# **POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT**

**January 2017**



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**INTRODUCTION**

This development and delivery plan has been produced to ensure that the City of London Police continues to discharge its obligations introduced by the ACPO Police Integrity Maturity Model, supports the continued embedding of the national Police Code of Ethics and implements improvements to ethics and integrity in the Force in line with national requirements and best practice.

**PLAN SUMMARY**

	Traffic Light Colour
<b>1. Commit Measures</b>	
1.1 Force has issued a statement committing to support and embed the Police Code of Ethics	GREEN
1.2 To maintain the Force Integrity Delivery Plan	GREEN
1.3 To maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force	GREEN
1.4 To maintain Directorate SPOCs to lead on integrity within their areas	GREEN
1.5 To have defined the Force approach to corruption within appropriate SOPs and supporting statements	GREEN
1.6 To have established a process for internally and externally communicating corruption /integrity/ misconduct outcomes	GREEN
1.7 To have established a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates)	GREEN
1.8 To have appointed a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan	GREEN
1.9 To ensure training on standards, values and leadership ethics is available for all staff	GREEN
1.10 To adopt APP and national guidance for Force policies and procedures	GREEN
<b>2. Development Measures</b>	
2.1 Maintain awareness of integrity obligations amongst workforce	GREEN
2.2 Reinforce the 'tone from the top' from chief officers	AMBER
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	WHITE
2.4 Ensure all relevant public consultations and internal surveys contain integrity questions	AMBER
2.5 Ensure the Force public website will contain clear and easily accessible information on integrity/transparency	AMBER
2.6 Improve the efficacy of messaging around ethics and the Code	GREEN
2.7 Embed the principles of the Code of Ethics into corporate decision making	GREEN
2.8 Review key Force planning processes (financial, business planning and risk) to incorporate consideration of the Police Code of Ethics	AMBER

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**PERFORMANCE REPORT**

Traffic Light Colour	Definition of measure achievement
GREEN	Aim is achieved in date and to level set.
AMBER	Current projections indicate this measure will not be met unless this additional action taken
RED	No progress on measure or deadline/level has not been met and it is unlikely will be met.

Target Report Checklist
<ul style="list-style-type: none"><li>• Current level of achievement</li><li>• Dates for work completed</li><li>• Dates future work will be completed by (milestones)</li><li>• Reasons for current achievement level</li><li>• Any risks that have been realised</li><li>• Work undertaken to manage realised risk</li><li>• Work to be undertaken to manage risk against target</li><li>• Impact of other indicators on this work area</li><li>• A statement from owner about whether they think the measure will or will not be achieved by the due date based on the information provided above.</li></ul>

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1. COMMITMENT CRITERIA	
<b>MEASURE</b>	<b>1.1. Force has issued a statement committing to support and embed the Police Code of Ethics</b>
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	The Commissioner will make a statement committing the Force to supporting and embedding the Police Code of Ethics and set out the framework for the management of integrity within the organisation
<b>DUE DATE</b>	December 2016
<b>MEASUREMENT</b>	Record date and document statement is issued within and to be reviewed annually
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Statement issued. Amber: Statement being drafted. Red: Statement not issued or out of date by more than three months
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
<p>The Force's commitment to the Police Code of Ethics is included prominently in all Force strategic level publications (Policing Plan, Force-level strategies and Policies). For the 2017 Policing Plan, this has been developed to link the Code's principles more explicitly to the Force values of Integrity, Fairness and Professionalism. It also includes reference to the internal processes to manage integrity within the organisation, i.e. the work of the Integrity Standards Board and scrutiny function of the Police Professional Standards and Integrity Sub Committee.</p>	

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1. COMMITMENT CRITERIA	
<b>MEASURE</b>	<b>1.2 To maintain the Force Integrity Delivery Plan</b>
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	To ensure work relating to integrity, including the continued embedding of the Police Code of Ethics, progresses and is reported routinely to the Integrity Standards Board and Police Professional Standards and Integrity Sub Committee.
<b>MEASUREMENT</b>	Existence of a plan which is reported to ISB quarterly
<b>DUE DATE</b>	December 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Plan exists Amber: Plan being drafted. Red: Plan not issued or out of date by more than three months
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
This plan was accepted by the by the ISB at its meeting on the 14 <sup>th</sup> November 2016	

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1. COMMITMENT CRITERIA	
<b>MEASURE</b>	1.3 To maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	To monitor activities relating to workforce and organisational integrity and drive activity with regard to integrity and transparency.
<b>MEASUREMENT</b>	Group exists, meets regularly and provides reports to the Professional Standards and Integrity Sub Committee
<b>DUE DATE</b>	November 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Group exists and meets regularly. Amber: Group exists but has not met for over 3 months. Red: Group doesn't exist or has not met for 6 months
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
<p>The Integrity Standards Board is now established; it is chaired by the Assistant Commissioner, attended by all directorates and representatives from the Town Clerk's Department and Police Committee. The meetings are quarterly and minuted.</p> <p>The last meeting was 14<sup>th</sup> November 2016. The next meeting will be 15<sup>th</sup> March 2017.</p>	

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1. COMMITMENT CRITERIA	
<b>MEASURE</b>	1.4 To maintain Directorate SPOCs to lead on integrity within their areas
<b>OWNER</b>	Directorate Heads (Head of Strategic Development to coordinate)
<b>AIM/RATIONALE</b>	To ensure Directorates are fully linked into integrity monitoring and activities that support the continued development of integrity within the Force.
<b>MEASUREMENT</b>	Directorate SPOCs exist and attend ISB.
<b>DUE DATE</b>	November 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Directorate representation exists and attends ISB Amber: Directorate SPOCs exist but Directorates have not been represented at 1 ISB Red: Directorate representation does not exist or directorates have not been represented at 2 or more consecutive meetings.
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
Directorate SPOCs exist for all directorates and are written into ISBs terms of reference. If the SPOC cannot attend ISB, they are required to arrange suitable representation at an appropriate level.	

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1. COMMITMENT CRITERIA	
<b>MEASURE</b>	1.5 To have defined the Force approach to corruption within appropriate SOP's and supporting statements
<b>OWNER</b>	Head of Professional Standards
<b>AIM/RATIONALE</b>	To ensure the Force approach to corruption is clearly documented and communicated to all staff and the public, supporting a culture of confidence within the Force in reporting suspected corruption and challenging behaviour and transparency
<b>MEASUREMENT</b>	Relevant SOPs (Investigation and sanctions) detail Force approach to corruption and Commissioner has issued a statement as part of the Force's commitment to the ACPO Police Integrity Model detailing the zero tolerance approach
<b>DUE DATE</b>	December 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Position articulated and published. Amber: Process in development Red: No process or past the due by date by 3 months or more
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	<p>The Force has a ROBUST approach to counter corruption. This message has been communicated through a variety of methods, including intranet articles and workshops. There is a current anti-corruption SOP and Control Strategy. Safecall provides a secure and anonymous reporting system where the workforce can report any concerns, which has recently (February) been reinforced by intranet articles.</p> <p>PSD is specifically feeding into the strategic processes to identify (and thereafter manage) threat, risk and harm, and includes counter corruption amongst other PSD-related issues.</p> <p>A new Professionalism newsletter is being developed and is due to launch late March/early April, which will include articles around raising awareness of corruption and acceptable behaviours.</p>



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1. COMMITMENT CRITERIA	
<b>MEASURE</b>	1.6 To have established a process for internally and externally communicating corruption /Integrity/ misconduct outcomes
<b>OWNER</b>	Director of Professional Standards
<b>AIM/RATIONALE</b>	To support the transparency, facilitate organisational learning and provide confidence that the force is openly addressing issues relating to corruption, integrity and misconduct. .
<b>MEASUREMENT</b>	Process established and maintained
<b>DUE DATE</b>	December 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Process established and being used. Amber: Process established but not being consistently used Red: No process or process routinely not used
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
There is a process in place to publish the outcomes of hearings internally in sufficient detail to identify organisational learning, The results of misconduct hearings that are held in n public are also published on the public website (most recent example: 7 <sup>th</sup> November 2016).	

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1. COMMITMENT CRITERIA	
MEASURE	1.7 To have established a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates)
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure the Force is fully engaged in the regional tri-force ethics challenge panel, promoting organisational learning and providing support to officers and staff in ethical decision making.
MEASUREMENT	Process in place and being used.
DUE DATE	March 2017
TRAFFIC LIGHT CRITERIA	Green: Process in place and being used. Amber; Process in development. Red: Process in place but not being used or no process in existence past due date
TRAFFIC LIGHT	GREEN
CURRENT POSITION	

The formal launch of the London Panel Challenge Forum took place on 15<sup>th</sup> December 2016. The milestones are as below:

1. Identify ethics associates - delivered – the Force has identified a cadre of 19 volunteer ethics associates (EAs) and advised the MPS and BTP of names. All have had background checks conducted re suitability.
2. LPCF launched – complete – launched on 15<sup>th</sup> December 2016.
3. Following the launch, each force to establish internal process for triaging ethical issues by the EAs for consideration at the following quarterly panel (by March 2017). The first internal meeting took place on 10<sup>th</sup> February where the process to submit and consider ethical issues was agreed. An intranet site is now being developed so that people can raise issues online (anonymously if preferred). The site will also be used to provide feedback.

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1. COMMITMENT CRITERIA	
<b>MEASURE</b>	<b>1.8 To have appointed a chief officer lead on integrity and ensure their active involvement in the oversight of the integrity plan</b>
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	To ensure chief officer ownership and oversight of ethical and integrity issues within Force
<b>MEASUREMENT</b>	Chief officer lead appointed
<b>DUE BY</b>	November 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Chief officer lead appointed and active Amber: Chief Officer lead appointed but not active in role Red: No chief officer lead. .
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
<p>The Assistant Commissioner is the Chief Officer lead for integrity matters in force. In addition to chairing the Integrity Standards Board, they also chair the Organisational Learning Forum, the Crime Data Integrity Oversight Board and lead on the associated area of Professional Standards. They are held to account by the Commissioner, the Grand Committee and the Professional Standards and Integrity Sub Committee.</p>	

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1. COMMITMENT CRITERIA	
<b>MEASURE</b>	1.9 To ensure training on standards, values and leadership ethics is available for all staff
<b>OWNER</b>	Director of HR
<b>AIM/RATIONALE</b>	To ensure staff are supported in their duty to uphold the Force's integrity standards
<b>MEASUREMENT</b>	Our recruitment and promotion processes will contain references to how integrity standards will be used as part of the assessment criteria for recruitment of new officers within the Force and for promotion of existing officers
<b>DUE DATE</b>	November 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Training courses are fully available within a rolling yearly programme. Amber: Training courses are still in development. Red: No training courses are available.
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	Information on standards, values and leadership is available to all staff on the intranet. All courses, Inspectors, Sergeants, Custody, PST etc provide advice and guidance on standards and integrity. A major aspect of the Probationer programme is ensuring students uphold the force integrity standards, not only delivered by L&D trainers but also PSD. Specials initial courses receive input on standards and integrity. All training courses have been reviewed to ensure they incorporate the national College of Policing Code of Ethics. The Code of Ethics now also forms a discrete element of induction training, which includes written information and face to face presentations.

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1. COMMITMENT CRITERIA	
<b>MEASURE</b>	<b>1.10</b> To adopt APP and national guidance for Force policies and procedures
<b>OWNER</b>	Directorate Heads (co-ordinated by Head of Strategic Development)
<b>AIM/RATIONALE</b>	To ensure the Force complies with national standards with regard to policies and SOPs
<b>MEASUREMENT</b>	Strategic Development will maintain a watching brief on published APP to ensure all new/revised APP is considered by Policy owners.
<b>DUE DATE</b>	November 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: APP adopted or force position reviewed against APP. Amber: APP introduced and review is required RED: APP not considered
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
<p>When Authorised Professional Practice (APP) was introduced by the College of Policing, the Force committed to adopt the APP in full where that could be done. Where full adoption could not take place (due to City-specific circumstances), Policy owners were required to review force procedures against the APP to ensure there was no conflict and that force processes reflect national best practice. This has been done for all currently published APP and is up to date (as at January 2017).</p> <p>APP relates principally to operational processes and there is currently very limited APP that relates to those areas that most impacts on integrity (e.g. gifts and hospitality, expenses, use of telephones/ICT systems, sponsorship etc.). Strategic Development checks the College of Policing APP site monthly to identify any revised or new APP to ensure it is considered by the Force. Any such identified APP will be reported as part of this action plan.</p>	

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2. Development Measures	
<b>MEASURE</b>	2.1 Maintain awareness of integrity obligations amongst workforce
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	To ensure that integrity remains in the forefront of people's minds
<b>MEASUREMENT</b>	HoSD to provide ISB with details of integrity-related activities and evidence of publication.
<b>DUE BY</b>	QUARTERLY UPDATES to ISB
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Integrity related activities undertaken and articles published Amber: Statement published with strategy under development. Red: No integrity related activity undertaken.
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
<p>To complement the PSD-related Communications month that ran in October 2016, February has been designated 'Ethics' month. The month was launched with an article called 'The only way is Ethics' and is being supported by an article developed by Organisational Development on the links between ethical behaviours and leadership. Articles are also due to be published during the month focussing on staff members who have volunteered to be ethics associates. Once the intranet site for submitting and providing feedback on ethical related issues is running, a launch article will be featured on City net.</p> <p>Workforce integrity obligations will be re-enforced in the Professionalism Newsletter which is being launched late March/early April 2017.</p>	

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2. Development Measures	
<b>MEASURE</b>	2.2 Reinforce the 'tone from the top' from chief officers
<b>OWNER</b>	Director of Professional Standards/Head of Strategic Development
<b>AIM/RATIONALE</b>	The workshop held in Qtr 3 of 2016-17 highlighted the continued need for the chief officer team to lead by example and set the tone from the top. This presents an opportunity for the Senior Leadership Team to consider how they do business and how they can 'fly the flag' for integrity
<b>MEASUREMENT</b>	The SLT to publicise to the Force its planned actions to demonstrate ongoing integrity.
<b>DUE BY</b>	March 2017
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Event held and implementation plan developed and being delivered; AMBER EVENT held, implementation plan still in development past the due date; RED: Event not held and no implementation plan either developed or being delivered.
<b>TRAFFIC LIGHT</b>	AMBER
<b>CURRENT POSITION</b>	
<p>An event is planned for January 2016 with the SLT where this will be considered. Following that event and any decisions made, this will be reported more fully to the ISB together with progress against actions to be taken.</p> <p>As at January 2017 the event had not taken place. It is scheduled to be addressed at the Senior Leadership Meeting on 21<sup>st</sup> March 2017.</p>	

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2 Development Measures	
<b>MEASURE</b>	<b>2.3 Conduct an annual review of the Force integrity programme and implement identified improvements</b>
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	To ensure the Force continues to develop its approach to integrity and has plans to embed best practice.
<b>MEASUREMENT</b>	Review completed and reported to ISB
<b>DUE BY</b>	September 2017
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Review complete and action plan amended Amber: review complete but action plan unamended or review overdue by 1-3 months Red: Review overdue by 3 months or more with unamended action plan.
<b>TRAFFIC LIGHT</b>	<b>WHITE</b>
<b>CURRENT POSITION</b>	
The review for 2016-17 has taken place, triggered by the Integrity workshop in Qtr 3. The next review will take place in August 2017.	



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2 Development Measures	
MEASURE	2.4 Conduct a full staff survey and ensure that the survey addresses integrity
OWNER	HR Director
AIM/RATIONALE	To benchmark the current position with respect to the workforce's view of integrity within the organisation. The results of the survey will also inform the review of the action plan going forward.
MEASUREMENT	Force will have an independent committee established with a defined meeting programme
DUE BY	May 2017
TRAFFIC LIGHT CRITERIA	Green: Survey complete, results published and action plan produced. Amber: Survey completed by the due date but results unpublished and action plan still in development. Red: Survey not completed by due date.
TRAFFIC LIGHT	AMBER
CURRENT POSITION	
<p>The last Staff Survey was completed in 2014. Responsibility for conducting the Staff Survey was given to HR by the AC in October 2016. The survey is currently at the scoping /planning stage, which includes looking at other forces' surveys that have been highlighted by HMIC as being good examples of their kind.</p> <p>Following a benchmarking visit to Durham (who had been graded 'outstanding' in this area), the Force is in the final stages of commissioning the University of Durham to conduct the staff survey. Ethical considerations have been built into their survey and is considered best practice by HMIC. Following the survey being conducted, Organisational Development have set up dates for workshops to work through with staff the issues raised by the survey.</p>	

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2 Development Measures	
<b>MEASURE</b>	<b>2.5 Ensure the Force public website will contain clear and easily accessible information on integrity/transparency</b>
<b>OWNER</b>	Head of PSD
<b>AIM/RATIONALE</b>	To support the national transparency agenda regarding the publication of chief officer expenses, salaries, business interests and gifts and hospitality.
<b>MEASUREMENT</b>	Information published and current
<b>DUE BY</b>	March 2017 (with regard to the future developments)
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Information published and current; Amber: Information published by out of date by 1-3 months; Red: Information not published or out of date by more than 3 months.
<b>TRAFFIC LIGHT</b>	AMBER
<b>CURRENT POSITION</b>	
<p>The Force currently publishes registers relating to chief officer expenses, salaries and gifts and hospitality. The plan is to enhance the current arrangements so that the gifts and hospitality register includes directorates and is more accessible/understandable. As at January 2017 this had not been completed.</p> <p>There is a process in place to review the information on the website, however, having it as part of this plan will ensure it is routinely checked and reported to ISB/Professional Standards and Integrity Sub Committee.</p>	

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2 Development Measures	
<b>MEASURE</b>	<b>2.6 Improve the efficacy of messaging around ethics and the Code</b>
<b>OWNER</b>	Corporate Communications Director
<b>AIM/RATIONALE</b>	To workshop conducted in Qtr 3 highlighted that the force is suffering from 'message fatigue' and that new/innovative ways of conveying messages is required.
<b>MEASUREMENT</b>	Different forms of messaging being used; improvement to be identified through staff survey
<b>DUE BY</b>	March 2017 (with regard to proposals for implementation)
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Proposal made and being implemented. Amber: Proposals made but not yet implemented Red: No proposals made by the due date.
<b>TRAFFIC LIGHT</b>	<b>GREEN</b>
<b>CURRENT POSITION</b>	<p>Corporate Communications has recently proposed a new internal and external communications strategy, which looks at a variety of different approaches to effective communication. A meeting took place between the Head of Strategic Development and the Corporate Communications Director in early December 2016 to explore how the new approaches can be used to promote integrity and ethical behaviour.</p> <p>The 'Ethics' themed month was a direct result of that meeting and whilst that principally still uses the intranet site, it will be complemented by screen messages on Force electronic screens in corridors and canteens. Material will also be incorporated into the 'Force cascade' (a process that encourages face to face communication of key messages) throughout the year.</p> <p>The Professionalism Newsletter will further complement the messaging.</p>

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2 Development Measures	
<b>MEASURE</b>	<b>2.7 Embed the principles of the Code of Ethics into corporate decision making</b>
<b>OWNER</b>	Head of Strategic Development
<b>AIM/RATIONALE</b>	The aim of this measure is to evidence consideration of the Code of Ethics' principles in corporate decision making.
<b>MEASUREMENT</b>	Amendments made to standard report templates/impact assessments to incorporate the principles of the Code of Ethics
<b>DUE BY</b>	December 2016
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Amendments made to all Force standard report templates Amber: Amendment proposals being developed Red: No amendments made by due date
<b>TRAFFIC LIGHT</b>	GREEN
<b>CURRENT POSITION</b>	
<p>The impact assessment template that is attached to all Force report templates has been amended to include consideration of 9 principles of the Code of Ethics. Additionally, a standing agenda item has been added to all strategic meetings that prompts the board to consider the decisions made at the meeting to ascertain whether there is a Code of Ethics or victim/service delivery implication to the decision taken.</p>	

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2 Development Measures	
<b>MEASURE</b>	<b>2.8</b> Review key Force planning processes (financial, business planning and risk) to incorporate consideration of the Police Code of Ethics
<b>OWNER</b>	Head of Governance and Assurance
<b>AIM/RATIONALE</b>	The aim of this measure is to assess opportunities to design integrity into core planning processes that are performed throughout the year
<b>MEASUREMENT</b>	Review complete and amendments made (where possible) to risk and planning processes.
<b>DUE BY</b>	April 2017
<b>TRAFFIC LIGHT CRITERIA</b>	Green: Review complete and amendments made (where possible) to risk and planning processes. Amber: Review ongoing. Red: Review not complete by due date and no amendments made to any processes.
<b>TRAFFIC LIGHT</b>	AMBER
<b>CURRENT POSITION</b>	
<p>Head of Governance and Assurance is reviewing processes for planning and risk that will be completed for 2017 plans to come on line by April 2017. Proposals for implementation resulting from the review will be reported to the March ISB.</p>	

