



## **Professional Standards and Integrity Sub (Police) Committee**

**Date:** FRIDAY, 22 SEPTEMBER 2017

**Time:** 1.45 pm

**Venue:** COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

**Members:** Alderman Alison Gowman (Chairman)  
Deputy Douglas Barrow (Ex-Officio Member)  
Nicholas Bensted-Smith  
Tijs Broeke  
Deputy Richard Regan  
Lucy Sandford (External Member)  
Deputy James Thomson (Ex-Officio Member)  
James Tumbridge

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**Lunch will be served in the Guildhall Club at 1pm**

**John Barradell  
Town Clerk and Chief Executive**

## **AGENDA**

1. **APOLOGIES**

2. **DECLARATIONS BY MEMBERS OF PERSONAL OR PREJUDICIAL INTERESTS  
IN RESPECT OF ITEMS TO BE CONSIDERED AT THIS MEETING** **For Decision**

3. **MINUTES**

To agree the public minutes from the meeting held on 5 June 2017

**For Decision**  
(Pages 1 - 4)

4. **INTEGRITY DASHBOARD AND CODE OF ETHICS UPDATE**

Report of the Commissioner of Police

**For Information**  
(Pages 5 - 8)

a) Integrity Dashboard - 2017/18 Q1 (Pages 9 - 12)

b) Police Integrity Development and Delivery Plan Report 2016-17 (Pages 13 - 34)

5. **QUESTIONS RELATING TO THE WORK OF THE SUB-COMMITTEE**

6. **ANY OTHER BUSINESS THE CHAIRMAN CONSIDERS URGENT** **For Discussion**

7. **EXCLUSION OF THE PUBLIC** **For Discussion**

MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of the Schedule 12A of the Local Government Act.

**For Decision**

### **Confidential Agenda**

8. **CONFIDENTIAL MINUTES**

To agree the confidential minutes from the last meeting held on 5 June 2017

**For Decision**  
(Pages 35 - 42)

9. **EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES**

**For Information**  
(Pages 43 - 50)

10. **STATISTICAL INFORMATION Q1**

Report of the Commissioner of Police

**For Information**  
(Pages 51 - 82)

11. **SUMMARY OF CASES**

Report of the Commissioner of Police

**For Information**  
(Pages 83 - 90)

12. **CONDUCT AND COMPLAINT CASES**

Report of the Commissioner of Police

**For Information**

a) Case to Answer / Upheld (Pages 91 - 98)

b) No Case to Answer / Not Upheld (Pages 99 - 134)

c) Local Resolution (Pages 135 - 146)

13. **IPCC POLICE COMPLAINTS BULLETIN (1 APRIL 2017 - 30 JUNE 2017)**

Report of the Commissioner of Police

**For Information**  
(Pages 147 - 162)

14. **ANNEX A: GLOSSARY OF TERMS**

Report of the Commissioner of Police

**For Information**  
(Pages 163 - 170)

15. **CONFIDENTIAL QUESTIONS RELATING TO THE WORK OF THE SUB-COMMITTEE**

16. **ANY OTHER CONFIDENTIAL BUSINESS THE CHAIRMAN CONSIDERS URGENT**

**For Discussion**

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## **PROFESSIONAL STANDARDS AND INTEGRITY SUB (POLICE) COMMITTEE** **Monday, 5 June 2017**

Minutes of the meeting of the Professional Standards and Integrity Sub (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Monday, 5 June 2017 at 1.45 pm

### **Present**

#### **Members:**

Alderman Alison Gowman (Chairman)  
Lucy Sandford (External Member)  
Deputy James Thomson (Ex-Officio Member)

#### **Officers:**

Oliver Bolton	-	Town Clerk's Department
George Fraser	-	Town Clerk's Department
Stuart Phoenix	-	City of London Police
Dermot Robinson, Supt.	-	City of London Police

#### **1. APOLOGIES**

Apologies for absence were received from Deputy Douglas Barrow, Nick Bensted-Smith and Deputy Richard Regan.

#### **2. DECLARATIONS BY MEMBERS OF PERSONAL OR PREJUDICIAL INTERESTS IN RESPECT OF ITEMS TO BE CONSIDERED AT THIS MEETING**

There were no declarations of interest.

#### **3. MINUTES**

RESOLVED – That the public minutes of the meeting held on the 1 March 2017 be approved as an accurate record.

#### **4. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**

There were no questions.

#### **5. ANY OTHER BUSINESS THE CHAIRMAN CONSIDER URGENT**

There was no urgent business.

#### **6. EXCLUSION OF THE PUBLIC**

RESOLVED - That Under Section 100 (A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1, Paragraphs 1, 2 and 7 of Schedule 12A of the Local Government Act.

#### **7. NON-PUBLIC MINUTES**

RESOLVED – That the non-public minutes from the last meeting on 1 March 2017 be approved as an accurate record.

8. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

There were no questions.

9. **ANY OTHER NON-PUBLIC BUSINESS THE CHAIRMAN CONSIDER URGENT**

Members considered non-public business.

10. **CONFIDENTIAL MINUTES**

RESOLVED – That the confidential minutes from the last meeting on 1 March 2017 be approved as an accurate record.

11. **PEEL INSPECTION UPDATE**

The Sub-Committee heard a verbal update from the Commissioner of Police on the PEEL Inspection.

RESOLVED – That the Commissioner be heard.

12. **INTEGRITY DASHBOARD AND CODE OF ETHICS UPDATE**

The sub-committee received a report of the Commissioner of Police that provided updates on various issues considered to be measures of integrity and indicators of adherence to professional standards within the City of London Police.

RESOLVED – That the report be noted.

13. **PROFESSIONAL STANDARDS STATISTICS - Q4 - 1ST JAN - 31ST MAR 2017**

The sub-committee received a report of the Commissioner of Police containing the statistics prepared by the Professional Standards Directorate for the Fourth Quarter of 2016/17 (January to March).

RESOLVED – That the report be noted.

13.1 **Summary of Cases**

The sub-committee received a report of the Commissioner of Police summarising Professional Standards cases and activity that has taken place over the last period.

RESOLVED – That the report be noted.

13.2 **Misconduct Meetings**

The Sub-Committee received a report that summarised all the misconduct hearings that had taken place within the last period.

RESOLVED – That the report be received.

**13.3 No Case to Answer / Not Upheld**

The sub-committee received a report of the Commissioner of Police summarising the cases in which it was determined that there was no case to answer/not upheld.

RESOLVED – That the report be received.

**13.4 Local Resolution**

The sub-committee received a report of the Commissioner of Police summarising cases that concluded with a local resolution within the last period.

RESOLVED – That the report be noted.

**14. IPCC POLICE COMPLAINTS BULLETIN (1 APRIL 2016 - 31 MARCH 2017)**

The sub-committee received a report of the Commissioner of Police detailing Police complaints for the reporting period of 1 April 2016 to 31 March 2017.

RESOLVED – That the report be noted.

**15. GLOSSARY OF TERMS**

The sub-committee received a report of the Commission of Police that provided a glossary of terms used within the preceding reports on Professional Standards activity.

RESOLVED – That the report be noted.

**16. CONFIDENTIAL QUESTIONS RELATING TO THE WORK OF THE SUB-COMMITTEE**

Members heard confidential questions relating to the work of the sub-committee.

**17. ANY OTHER CONFIDENTIAL BUSINESS THE CHAIRMAN CONSIDERS URGENT**

The sub-committee considered confidential business relating to the sub-committee.

**The meeting ended at 3.48 pm**

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Chairman

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<b>Committee(s):</b> Professional Standards and Integrity Sub Committee	<b>Date:</b>
<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 was considered by the Integrity Standards Board on 7<sup>th</sup> September 2017. There was a discussion around the indicators and each was assessed by the board, at this time none were considered to have any underlying cause for concern.

### *Code of Ethics Update:*

The Force hosted the last London Police Challenge Forum meeting on 13<sup>th</sup> June 2017, this was the third such meeting of this forum.

The Force has taken a number of steps over the quarter to promote integrity and further embed the Police Code of Ethics. These include:

- The Force launched the internal “raise and ethical dilemma” link on its website. At the time of writing no referrals have been made.
- The Integrity Action Plan will be reviewed once the Staff Survey Results have been published and analysed.
- The Force staff survey, which refers heavily to individual and organisational integrity will be reviewed once results have been received on 15<sup>th</sup> September.
- Integrity Dashboard indicators will be reviewed in line with Force staff survey results.

## 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 indicates the extent to which the Force's workforce acts with integrity. It is attached for Members' information at Appendix A.
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 B.

### 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. The last board convened on Thursday, 7<sup>th</sup> September 2017.
4. The Board considered the integrity dashboard, the version submitted for consideration is contained at Appendix A.
5. Each indicator was considered at the meeting. This reporting period saw the removal of the assessment criteria from each indicator. Due to the low numbers considered for each area no assessment is given in the document and it was left to the discussion at the meeting to assess if any area required closer monitoring or required action.
6. Consideration of the indicators highlighted 4 areas which would require additional information for the next meeting should numbers continue to be at the high end of historical reported norms; these were:
  - **Indicator 1: *Number of Grievances registered with HR.*** Last year saw 13 grievances in total with this year reporting 3 within quarter 1. It was confirmed at ISB that none of the grievances were integrity related but this would be monitored for the next meeting.
  - **Indicator 3: *Number of registered complaints against the Force excluding Action Fraud.*** Last year saw 102 complaints in total with 32 in the period for this year. If this trend continued a more detailed breakdown would be required for the next report.

- **Indicator 8: *Number of monitoring assessments undertaken around expenses claims.*** With only 1 recorded last year it was determined that this would be monitored and a more detailed report provided for the next meeting as there was already 1 reported for 2017/18. However, it was accepted that there may not be anything to monitor here as the number considered was low and would only require further work if additional reports were made within year.
  - **Indicator 15: *Number of procurement purchases assessed by PSD for investigation.*** This was considered in a similar light to indicator 8; with 1 recorded for last year and 1 recorded within quarter 1 so far for this year.
7. In addition to the existing indicators contained within the dashboard the meeting considered the addition of 5 new indicators around sponsorship as a result of the new SOP.
- KP1 – Register of current sponsorship arrangements (ongoing and ad hoc).
  - KP2 – Publication of organisations sponsoring/donating and amounts.
  - KP3 – Disclosure of any sponsorship/donation by an organisation and award of a Force contract to that organisation.
  - KP4 – Percentage of donations/sponsorships reflected in the financial ledger.
  - KP5 – Breaches of sponsorship SOP.
8. These indicators were agreed in principle with the caveat around KP 2 & 3 being benchmarked with other organisations as there were concerns that if recorded there could be commercially confident information published. An approach was therefore sought to ensure the Force followed best practice in these areas and as such an exercise would take place to establish how other public sector organisations published information on sponsorship. It is envisaged that KP5 will be added to the Integrity Dashboard for the next reporting period.
9. The meeting also considered work to embed the Police Code of Ethics and work to progress the Integrity Development Plan, details of which appear immediately below.

#### *Code of Ethics Update*

10. The Force hosted the second London Police Challenge Forum (chaired by T/Commander Gyford). This was well attended and well received. The outcome of this meeting has not yet been published by the MPS who administer the meeting.
11. The Force launched the internal “raise and ethical dilemma” link on its website. At the time of writing no referrals have been made. This was discussed at the meeting and the AC asked if conformation could be brought back that the scheme was anonymous.

12. The Integrity Action Plan will be reviewed over the next period using the results of the Force Staff Survey to shape the development of existing and new measures. The results of this survey should be published after the 15<sup>th</sup> September and at time of report writing are not available for oversight. The Integrity Action Plan will also link with the new Integrity Strategy so that measures will be associated with the stands of the strategy in order for the Force to demonstrate progress on delivery.
13. Work is also being undertaken between Strategic Development and Professional Standards to review the measures contained within the Integrity Dashboard and ensure these remain fit for purpose and represent all lines of integrity that need to be monitored. A preliminary meeting took place in July to discuss a way forward. It was agreed that, as with the Integrity Action Plan, the staff survey results would need to be reviewed to identify areas that could be considered for inclusion. After publication of the survey Strategic Development will meet with Professional Standards to review the indicators and further develop the Dashboard for integrity monitoring. The aim is to ensure all appropriate indicators are considered and monitored to give a full picture of integrity within Force.

## **Appendices**

- Appendix A – Integrity Dashboard
- Appendix B – Integrity and Code of Ethics Development Plan

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**NOT PROTECTIVELY MARKED**

**Appendix A**

**CITY OF LONDON POLICE**

**INTEGRITY  
DASHBOARD 2017/18  
Quarter 1**  
Version 1.0



Number	Indicator	FORCE INTEGRITY INDICATORS											
		Historic Levels						Current Levels 2017/18					
		2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	QTR 1	QTR 2	QTR 3	QTR 4	Total	Total
1	Number of Grievances registered with HR	7	7	7	13	3						3	3
	There were 3 grievances raised in the first quarter this year.												
2	Number of Employment Tribunals that cite the Force	0	2	0	2	0						0	0
	There were no new ET's raised within the first quarter, 3 have been added to an existing ET around pensions												
3	Number of registered complaints against Force excluding Action Fraud	60	117	105	102	32						32	32
	There were 32 complaints recorded during the Q1 period and 57 allegations (both excl Action Fraud). Of these 57, the Top 5 National Allegation categories accounted for:- Other assault x 4; Oppressive Conduct/Harassment x 2; Unlawful/unnecessary arrest or detention x 3; Other neglect or failure in duty x 6; Incivility/Impoliteness/ Intolerance x 6.												
4	Number of Civil cases which cite the Force	14	24	23	17	6						6	6
	There were 6 civil cases recorded during Q1: - 1 x Damages re PTSD; 1 x property damage; 1 x Employer's liability re accident; 2 x Retention of Property; 1 x Unlawful arrest and detention.												
5	Investigations resulting from monitoring of irregular mobile phone use	0	0	0	1	0						0	0
	No investigations in Q1												
6	Number of monitoring exercises around irregular use/transitions involving Corporate credit cards	0	1	5	19	0						0	0
	There were 21 separate monitoring exercises during Q1 (new nominals, SIM nominals and ad hoc checks). None were highlighted for further assessment.												
7	Number of PSD investigations principally arising from complaints on use of Force	0	1	2	6	-						-	-
	Use of Force Forms now being recorded via Pronto - They are not being used for the purposes of integrity monitoring by CCU												
8	Number of monitoring assessments undertaken around expenses claims	0	1	2	1	1						1	1
	1 investigation relating to Overtime and Expenses claim												
9	Number of business Interest Investigations undertaken for police officers	1	3	1	6	0						0	0
	There were 2 Business Interests recorded in Q1 for Police Officers - 1 x Casual farm/gardening work ; 1 x Conducting garden tours Sandringham Estate												

FORCE INTEGRITY INDICATORS												
Number	Indicator	Historic Levels				Current Levels 2017/18						
10	Number of business Interest Investigations undertaken for support staff	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total		
		0	0	0	0	0				0		
11	There were 2 Business Interests recorded in Q1 for Civilian Staff - 2 x Volunteer Counsellor											
	Number of unregistered CoLP media contacts detected by Corp Comms and reported to PSD	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total		
		0	2	0	5	0				0		
12	No investigations during Q1											
	Number of investigations undertaken by PSD as a result of PNC/PND dip sampling	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total		
		1	1	2	0	0				0		
13	No Investigations during Q1											
	Number of monitoring exercises conducted on gifts and hospitality register entries	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total		
		0	5	3	8	1				1		
	There were 21 separate monitoring exercises during Q1 (new nominals, SIM nominals and ad hoc checks). None of these were highlighted for further assessment but 1 pro-active assessment commenced.											
	Download of 03/07/2017 – There were 84 Gifts and Hospitality submissions recorded during Q1 – at the time of download, 65 were showing as accepted and 14 were declined. Of the 84, 38 related to NPCC as single attendees (they may appear as part of a group directorate submissions). Of the 84, 19 (23%) showed neither a Line Manager Approval nor Directorate Head Decision											
14	Number of management issues arising from re-vetting of the workforce	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total		
				0	0	0				0		
	During the period of Q1 there were no Vetting refusals arising from current employees being re-vetting. There were 10 refusals from external applicants, mainly due to honesty/integrity or financial concerns. There were a total of 291 new vetting applications received during Q1, with 341 applications being completed, and 81 still pending at the close of the quarter.											
15	Number of procurement purchases assessed by PSD for investigation	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total		
		0	0	2	1	1				1		
16	1 investigation relating to Procurement issues											
	Number of positive results from testing with cause random drug testing	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total		
				0	0	0				0		
	No tests were undertaken in the first quarter due to lack of resources within L&D to manage the process properly alongside other priorities. Another round of testing took place on 28/07/2017 the results of this will be reported in the next dashboard update.											
17	Sponsorship Indicators TBC	2013/14	2014/15	2015/16	2016/17	QTR 1	QTR 2	QTR 3	QTR 4	Total		
						-				-		
	Measure still being defined.											

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**Appendix B**

# **POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2016-17**

## **September 2017 update**



## 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 Tracker			
	V1	V2	V3	V4
<b>1. Commit Measures</b>				
1.1 Force has issued a statement committing to support and embed the Police Code of Ethics	GREEN	GREEN	GREEN	GREEN
1.2 To maintain the Force Integrity Delivery Plan	GREEN	GREEN	GREEN	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	GREEN	GREEN	GREEN
1.4 To maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas	GREEN	GREEN	GREEN	GREEN
1.5 To have defined the Force approach to corruption within appropriate Standard Operating Procedures and supporting statements	AMBER	GREEN	GREEN	GREEN
1.6 To have established a process for internally and externally communicating corruption /integrity/ misconduct outcomes	GREEN	GREEN	GREEN	GREEN
1.7 To have established a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates)	AMBER	GREEN	GREEN	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	GREEN	GREEN	GREEN
1.9 To ensure training on standards, values and leadership ethics is available for all staff	GREEN	GREEN	GREEN	GREEN
1.10 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures	GREEN	GREEN	GREEN	GREEN

	Traffic Light Tracker			
	V1	V2	V3	V4
<b>2. Development Measures</b>				
2.1 Maintain awareness of integrity obligations amongst workforce	GREEN	GREEN	GREEN	GREEN
2.2 Reinforce the 'tone from the top' from chief officers	AMBER	AMBER	GREEN	GREEN
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	WHITE	WHITE	WHITE	AMBER
2.4 Ensure all relevant public consultations and internal surveys contain integrity questions	AMBER	AMBER	GREEN	GREEN
2.5 Ensure the Force public website will contain clear and easily accessible information on integrity/transparency	AMBER	AMBER	AMBER	AMBER
2.6 Improve the efficacy of messaging around ethics and the Code	AMBER	AMBER	GREEN	GREEN
2.7 Embed the principles of the Code of Ethics into corporate decision making	AMBER	AMBER	GREEN	GREEN
2.8 Review key Force planning processes (financial, business planning and risk) to incorporate consideration of the Police Code of Ethics	AMBER	AMBER	AMBER	GREEN

**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**

- Current level of achievement
- Dates for work completed
- Dates future work will be completed by (milestones)
- Reasons for current achievement level
- Any risks that have been realised
- Work undertaken to manage realised risk
- Work to be undertaken to manage risk against target
- Impact of other indicators on this work area
- 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.

**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
MEASURE	1.1. Force has issued a statement committing to support and embed the Police Code of Ethics
OWNER	Head of Strategic Development
AIM/RATIONALE	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
DUE DATE	December 2016
MEASUREMENT	Record date and document statement is issued within and to be reviewed annually
TRAFFIC LIGHT CRITERIA	Green: Statement Issued. Amber: Statement being drafted. Red: Statement not issued or out of date by more than three months
TRAFFIC LIGHT	GREEN
CURRENT POSITION	<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).</p> <p>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> <p>A statement has also been included in the draft Force Annual Report.</p>

**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA		
MEASURE	1.2 To maintain the Force Integrity Delivery Plan	
OWNER	Head of Strategic Development	
AIM/RATIONALE	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.	
MEASUREMENT	Existence of a plan which is reported to ISB quarterly	
DUE DATE	December 2016	
TRAFFIC LIGHT CRITERIA	Green: Plan exists Amber: Plan being drafted. Red: Plan not issued or out of date by more than three months	
TRAFFIC LIGHT	GREEN	
CURRENT POSITION		
<p>This plan was accepted by the by the ISB at its meeting on the 14<sup>th</sup> November 2016 and is being reported to each Integrity Standards Board and Professional Standards and Integrity Sub Committee.</p> <p>September 2017 – the plan is being reformatted to reflect delivery of the Force Integrity Strategy</p>		

**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
<b>MEASURE</b>	<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>
<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 10<sup>th</sup> May 2017.</p> <p>The current meeting is on 7<sup>th</sup> September 2017.</p> <p>The next meeting is on 30<sup>th</sup> November 2017.</p>

**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
MEASURE	1.4 To maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas
OWNER	Directorate Heads (Head of Strategic Development to coordinate)
AIM/RATIONALE	To ensure Directorates are fully linked into integrity monitoring and activities that support the continued development of integrity within the Force.
MEASUREMENT	Directorate SPOCs exist and attend Integrity Standards Board (ISB).
DUE DATE	November 2016
TRAFFIC LIGHT CRITERIA	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.
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
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. All Directorates now have SPOCs.	



**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
<b>MEASURE</b>	<b>1.5</b> To have defined the Force approach to corruption within appropriate Standard Operating Procedures (SOPs) 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 (Association Of Chief Police Officers, now the National Police Chiefs Council) 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.</p> <p>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 quarterly Professionalism newsletter has been and launched and includes articles around raising awareness of corruption as well as promoting positive, acceptable behaviours.</p>	



**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
MEASURE	1.6 To have established a process for internally and externally communicating corruption /integrity/ misconduct outcomes
OWNER	Director of Professional Standards
AIM/RATIONALE	To support the transparency, facilitate organisational learning and provide confidence that the force is openly addressing issues relating to corruption, integrity and misconduct..
MEASUREMENT	Process established and maintained
DUE DATE	December 2016
TRAFFIC LIGHT CRITERIA	Green: Process established and being used. Amber: Process established but not being consistently used Red: No process or process routinely not used
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>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, although there has not been any cause to publish anything since 7<sup>th</sup> November 2016. (last checked 22<sup>nd</sup> August 2017)</p>	

1. COMMITMENT CRITERIA	
MEASURE	1.7 To have established a process to support the Force's participation in the London Panel Challenge Forum (LPCF) (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	
<p>The formal launch of the London Panel Challenge Forum took place on 15<sup>th</sup> December 2016. The milestones are as below:</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. LPCF launched – complete – launched on 15<sup>th</sup> December 2016.</li> <li>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.</li> <li>4. First panel took place in March 2017. CoLP hosted one of the second panels on 13<sup>th</sup> June, chaired by T/Cdr Ops &amp; Security. Web-based reporting mechanism launched 1<sup>st</sup> week of May 2017 (no referrals yet received (September 2017)). Results of the June panel not yet circulated.</li> </ol>	

1. COMMITMENT CRITERIA	
MEASURE	1.8 To have appointed a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure chief officer ownership and oversight of ethical and integrity issues within Force
MEASUREMENT	Chief officer lead appointed
DUE BY	November 2016
TRAFFIC LIGHT CRITERIA	Green: Chief officer lead appointed and active Amber: Chief Officer lead appointed but not active in role Red: No chief officer lead. .
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<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>	

**NOT PROTECTIVELY MARKED**

1. COMMITMENT CRITERIA	
<b>MEASURE</b>	<b>1.9</b> To ensure training on standards, values and leadership ethics is available for all staff
<b>OWNER</b>	Director of Human Resources
<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, Personal Safety Trainers 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 Learning & Development trainers but also Professional Standards Department.	
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.	

# NOT PROTECTIVELY MARKED

1. COMMITMENT CRITERIA	
MEASURE	1.10 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures
OWNER	Directorate Heads (co-ordinated by Head of Strategic Development)
AIM/RATIONALE	To ensure the Force complies with national standards with regard to policies and Standard Operating Procedures
MEASUREMENT	Strategic Development will maintain a watching brief on published APP to ensure all new/revised APP is considered by Policy owners.
DUE DATE	November 2016
TRAFFIC LIGHT CRITERIA	Green: APP adopted or force position reviewed against APP. Amber: APP introduced and review is required RED: APP not considered
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<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 September 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/IT 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>	

**NOT PROTECTIVELY MARKED**

2. Development Measures	
MEASURE	2.1 Maintain awareness of integrity obligations amongst workforce
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure that integrity remains in the forefront of people's minds
MEASUREMENT	HoSD to provide ISB with details of integrity-related activities and evidence of publication.
DUE BY	QUARTERLY UPDATES to ISB
TRAFFIC LIGHT CRITERIA	Green: Integrity related activities undertaken and articles published Amber: Statement published with strategy under development. Red: No integrity related activity undertaken.
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>To complement the Professional Standards-related Communications month that ran in October 2016, February was 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 associate.</p> <p>The web-based reporting mechanism has been launched, together with the Professionalism newsletter, which is published quarterly.</p>	

2. Development Measures	
MEASURE	2.2 Reinforce the 'tone from the top' from chief officers
OWNER	Director of Professional Standards/Head of Strategic Development
AIM/RATIONALE	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
MEASUREMENT	The Senior Leadership Team (SLT) to publicise to the Force its planned actions to demonstrate ongoing integrity.
DUE BY	March 2017
TRAFFIC LIGHT CRITERIA	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.
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<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. 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> <p><b>May 2017 update:</b> This action has now been addressed by the Integrity Strategy, which explicitly references chief officers leading by example. Recent blogs and messaging from the SLT have also reinforced the importance of professional standards and integrity (an example is the AC message regarding acceptable boundaries of behaviour with regard to abuse of position). The Staff Survey, which has now been launched will assist in assessing what additional future action will be necessary to develop this action further.</p> <p><b>September 2017 update:</b> It is anticipated that the results from the Staff Survey, once known and published, will influence activity for this indicator. (Results to be delivered to the September meeting of the Senior Leadership Team).</p>	

2 Development Measures	
MEASURE	2.3 Conduct an annual review of the Force integrity programme and implement identified improvements
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure the Force continues to develop its approach to integrity and has plans to embed best practice.
MEASUREMENT	Review completed and reported to ISB
DUE BY	September 2017
TRAFFIC LIGHT CRITERIA	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.
TRAFFIC LIGHT	AMBER
CURRENT POSITION	
<p><b>September update:</b> Work has commenced to review the Integrity programme (e.g. initial meetings held re measures/indicators and development plan mapping onto the Integrity Strategy), however, a significant element of the review is dependent on the results of the Staff Survey, which as at August 2017 have not been received by the Force. They are due to be presented to the Senior Leadership Team at their September meeting. Following publication of the results, a programme of work will be developed to address the findings, including the integrity-related issues. It is anticipated this will be completed during October 2017. As the due by date for this indicator could not be met fully, it is graded as AMBER.</p>	



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	GREEN
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> <p><b>May 2017 update.</b> The survey launched on 28<sup>th</sup> April 2017. It will run for 4 weeks, then following a break of 2 weeks, it will run for another 2 weeks. There is a significant emphasis in the survey on individual and organisational ethical behaviour.</p> <p><b>September 2017 update</b> – The survey (which included a significant element relating to integrity) has been completed. Results are due to be delivered to the Senior Leadership Team at their September meeting.</p>

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.</p> <p>The website was checked on 22<sup>nd</sup> August. Expenses and Chief Officer pay were both up to date. Gifts and Hospitality were one quarter behind, hence the AMBER grading.</p>	

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>	GREEN
<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 which has launched will further complement the messaging.</p> <p>Corporate Communications have developed and distributed 'desk carousels' which display easily understood and direct messaging around Force vision and values, the principles of the Code of Ethics and Force priorities.</p>

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><b>May 2017 Update:</b> All strategic board templates have been amended to include a section that asks if any option cited, proposal made, recommendation made or decision required is likely to impact (positively or negatively) on the 9 principles of the Code of Ethics. Each template contains simple guidance to assist report authors to consider whether their report has such impact. The aim of this is to highlight good practice as well as mitigate any unintended adverse impact on integrity/transparency.</p> <p>A strap line "Supporting the Code of Ethics through the Force values of integrity, professionalism and fairness" has also been included below the Force crest to re-inforce the message.</p> <p>The effectiveness of this approach will be assessed as part of the annual review of this development plan.</p>	

2 Development Measures		
MEASURE	2.8	Review key Force planning processes (financial, business planning and risk) to incorporate consideration of the Police Code of Ethics
OWNER		Head of Governance and Assurance (HoGA)
AIM/RATIONALE		The aim of this measure is to assess opportunities to design integrity into core planning processes that are performed throughout the year
MEASUREMENT		Review complete and amendments made (where possible) to risk and planning processes.
DUE BY		April 2017
TRAFFIC LIGHT CRITERIA		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.
TRAFFIC LIGHT		GREEN
CURRENT POSITION		
<p><b>September 2017 Update.</b></p> <p>Head of Governance and Assurance reviews the risk and planning regimes annually. For 2016/17 that review included consideration of how both processes might better support the Force's integrity agenda through consideration of the Code of Ethics. With Force templates now including a section prompting consideration of the Code (see below), there is not any additional opportunity to amend the actual process to strengthen this existing arrangement. There is nothing inherent in the risk and planning processes that could be deemed to adversely impact the Code of Ethics..</p> <p>Pro forma now being used for all reports:</p> <p><i>[Consideration of Code of Ethics - This should explain whether and how any option, recommendation made or decision required, might positively support or negatively impact on the 9 principles of the Police Code of Ethics. Any negative impact might be inadvertent. You should consider whether any option, recommendation or decision:</i></p> <ul style="list-style-type: none"> <li><i>• Strengthens or weakens our accountability as an organisation</i></li> <li><i>• Casts any doubt over our honesty or integrity</i></li> <li><i>• Might be considered unfair by anyone</i></li> <li><i>• Supports our leadership aims or might be considered as counter to our leadership principles</i></li> <li><i>• Is objective, based on evidence and best professional judgement</i></li> <li><i>• Is transparent</i></li> <li><i>• Does not inadvertently or otherwise result in anyone being treated without respect</i></li> <li><i>• Demonstrates that we are acting selflessly in the public interest]</i></li> </ul>		

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