

**NOT PROTECTIVELY MARKED**

# **POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2018-19 November 2018 update**



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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

1. Commit Measures	Traffic Light Tracker			
	May 18	Aug 18	Nov 18	
1.1 Force has issued a statement committing to support and embed the Police Code of Ethics	GREEN	GREEN	GREEN	
1.2 Maintain the Force Integrity Delivery Plan	GREEN	GREEN	GREEN	
1.3 Maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force	GREEN	GREEN	GREEN	
1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas	GREEN	GREEN	GREEN	
1.5 Define the Force approach to corruption within appropriate Standard Operating Procedures and supporting statements	GREEN	GREEN	GREEN	
1.6 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes	GREEN	GREEN	GREEN	
1.7 Maintain a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates)	GREEN	GREEN	GREEN	
1.8 Maintain a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan	GREEN	GREEN	GREEN	
1.9 Ensure training on standards, values and leadership ethics is available for all staff	GREEN	GREEN	GREEN	
1.10 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures	GREEN	GREEN	GREEN	

2. Development Measures	Traffic Light Tracker			
	May 18	Aug 18	Nov 18	
2.1 Link in and participate in Regional and National boards concerned with the Code of Ethics	GREEN	GREEN	GREEN	
2.2 Launch an internal board to advise on and review key decisions and processes	WHITE	RED	RED	
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	WHITE	WHITE	AMBER	
2.4 To review staff survey and incorporate any relevant recommendations in this development action plan	GREEN	COMPLETE	COMPLETE	
2.5 To include a question about public perception of integrity in the annual community survey	WHITE	WHITE	WHITE	
2.6 Explore opportunities to include integrity/ethics more explicitly in recruitment processes	WHITE	RED	GREEN	

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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.
WHITE	Due date not reached

#### 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.

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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	March 2018
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 (Corporate Plan 2018-2023, Policing Plan 2017-2020, Force-level strategies and Policies).</p> <p>For the 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 Force Annual Report.</p>	

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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	March 2018
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 has been in existence since 14<sup>th</sup> November 2016 and is being reported to each Integrity Standards Board and Professional Standards and Integrity Sub Committee.</p> <p>It has been reviewed to include new development measures for 2018.</p>	

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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>	March 2018
<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>	<b>GREEN</b>
<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 27<sup>th</sup> September 2018.</p> <p>The next meeting is on 22<sup>nd</sup> November 2018.</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	March 2018
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	
<p>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 have SPOCs.</p> <p>At November 2018 the Directorate SPOCs are as follows:</p> <p>Crime – D Service</p> <p>I&amp;I – H McKoy</p> <p>Uniform Policing – E Michaels</p> <p>Economic Crime – G Whittick</p> <p>BSD – P Adams</p> <p>.</p>	

## 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>	March 2018
<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>	<b>GREEN</b>
<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 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> <p>The Force is continuing to work towards formalising collaboration opportunities with the British Transport Police relating to counter corruption (November 2018).</p>	



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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	March 2018
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 public are also published on the public website (last published results 25-28<sup>th</sup> September 2018) (checked November 2018)</p>	

## NOT PROTECTIVELY MARKED

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 2018
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	<b>GREEN</b>
CURRENT POSITION	
<p>The formal launch of the London Panel Challenge Forum took place on 15<sup>th</sup> December 2016.</p> <ol style="list-style-type: none"> <li>1. The Force has participated in every panel held since it began in Decemner 2016, including hosting a number of the meetings.</li> <li>2. The next meeting is being combined with a wider event that takes place on 13<sup>th</sup> December 2018 @ New Scotland Yard. Commander Ops and Head of Strategic Development will attend for City of London Police.</li> </ol>	

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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	March 2018
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	<b>GREEN</b>
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> <p>The Commander (Operations) additionally chairs London Police Challenge Forum panels for additional resilience.</p>	

## NOT PROTECTIVELY MARKED

1. COMMITMENT CRITERIA	
MEASURE	1.9 To ensure training on standards, values and leadership ethics is available for all staff
OWNER	Director of Human Resources
AIM/RATIONALE	To ensure staff are supported in their duty to uphold the Force's integrity standards
MEASUREMENT	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
DUE DATE	March 2018
TRAFFIC LIGHT CRITERIA	Green: Training courses are fully available within a rolling yearly programme. Amber: Training courses are still in development. Red: No training courses are available.
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>Information on standards, values and leadership is available to all staff on the intranet.</p> <p>All courses, Inspectors, Sergeants, Custody, Personal Safety Trainers etc provide advice and guidance on standards and integrity.</p> <p>A major aspect of the Probationer programme is ensuring students uphold the force integrity standards, not only delivered by Learning &amp; Development trainers but also Professional Standards Department.</p> <p>Specials initial courses receive input on standards and integrity.</p> <p>All training courses have been reviewed to ensure they incorporate the national College of Policing Code of Ethics. The Code of Ethics forms a discrete element of induction training, which includes written information and face to face presentations. (Position remains accurate @ November 2018).</p>	

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1. COMMITMENT CRITERIA	
MEASURE	<b>1.10</b> 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	March 2018
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	<b>GREEN</b>
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 November 2018).</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>	

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2. Development Measures	
MEASURE	2.1 1 Link in and participate in Regional and National boards concerned with the Code of Ethics
OWNER	Head of Strategic Development
AIM/RATIONALE	To ensure that the Force is able to contribute to and benefit from latest developments in ethical policing
MEASUREMENT	Head of Strategic Development to provide ISB with details of activities supporting this measure
DUE BY	QUARTERLY UPDATES to ISB
TRAFFIC LIGHT CRITERIA	Green: Active participation and new initiatives identified Amber: Intermittent participation. Red: No participation
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>Head of Strategic Development (HoSD) is now a member of both the regional and national integrity boards.</p> <p>HoSD attended the regional meeting in Chippenham (Bath Spa University) on 11<sup>th</sup> October 2018 and the national meeting on the 12<sup>th</sup> October at the same venue. The regional meeting was chaired by Professor Alyson McVean, the national meeting by the Chief Constable of Gwent Police.</p> <p>A number of initiatives were discussed, including assessing ethical drift during service and ethical filters during recruitment which CoLP will be able to benefit from when and will feature in the reviewed Development Plan for 2019.</p>	

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2. Development Measures	
MEASURE	2.2 Launch an internal board to advise on and review key decisions and processes
OWNER	Head of Strategic Development/Ch. Supt I&I
AIM/RATIONALE	One of the issues highlighted by the Staff Survey 2017 was a perception of organisational unfairness. This board would promote transparency and help to influence organisational behaviours.
MEASUREMENT	Existence of a board that produces useful information/advice to other boards/managers/policy developers.
DUE BY	July 2018
TRAFFIC LIGHT CRITERIA	Green: Board established and meeting to a schedule; AMBER: Board established but meeting ad hoc; RED: Board not yet established
TRAFFIC LIGHT	RED
CURRENT POSITION	
<p>Ch. Supt I&amp;I attended a national event relating to Staff Surveys where good practice disseminated by Devon &amp; Cornwall Police included a discussion about internal boards that discuss referrals made about corporate/organisational decisions and publish their findings. They have found this has helped to influence the quality of decision making from an ethical perspective.</p> <p>Last year (2017) we included code of ethics considerations into report templates. This board would fulfil two purposes:</p> <ol style="list-style-type: none"> <li>(1) It would indicate the level of success of the action already taken with regard to changes to the template referred to above; and</li> <li>(2) It would support addressing one of the findings of the staff survey re perceived organisational unfairness</li> </ol> <p>Discussions have been ongoing (principally led by Ch.Supt I&amp;I) for such a board to be agreed in principle. There are dissenting views around its necessity. Some feel it is duplicating work given that all Force report templates now include prompts around the ethical implications of proposals or decisions. Given that many believe current mechanisms in place are sufficient to ensure adherence and consideration of the Code of Ethics, directopn is being sought from ISB as to whether this action should be closed.</p>	

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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	October 2018
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>This plan is now under review, principally following the regional and national meetings held in Bath during mid-October. A reviewed plan will be presented to the next Integrity Standards Board for consideration.</p>	



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2 Development Measures	
MEASURE	2.4 To review staff survey and incorporate any relevant recommendations in this development action plan
OWNER	Head of Strategic Development / Ch. Superintendent I&I
AIM/RATIONALE	To inform development of this plan and address concerns raised in the Staff Survey.
MEASUREMENT	Review complete and action plan amended
DUE BY	March 2018
TRAFFIC LIGHT CRITERIA	Green: Review complete and action plan amended Amber: review complete but no changes to action plan. Red: review not yet complete
TRAFFIC LIGHT	<b>GREEN /COMPLETE</b>
CURRENT POSITION	
<p>The last Staff Survey was completed by mid 2017. Several indicators within the survey were based on perceptions of organisational fairness and integrity. The Ch.Supt I&amp;I holds responsibility for ensuring that the findings of the survey are implemented. When the survey was being set and conducted, it was envisaged that the results would inform development of this plan; following receipt of the results, the Head of Strategic Development met with Ch. Supt I&amp;I to ascertain the extent to which this could be done.</p> <p>Reviewing the results it was clear that hardly any issues were raised which reflected poorly on organisational integrity; the only such area was a perception of organisational unfairness regarding decisions made at a strategic level. A measure to address that has therefore been included in this plan (2.3).</p> <p>The results were also reviewed to see if there was an opportunity to introduce new integrity indicators into the Integrity Dashboard, however, the Head of Strategic Development and Ch.Supt I&amp;I agreed there is not anything in the survey that would support this.</p>	

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2 Development Measures	
MEASURE	2.5 To include a question about public perception of integrity in the annual community survey
OWNER	Corporate Communications Director
AIM/RATIONALE	To provide the Force with a baseline indicator of the public's perception of the extent to which the force acts with integrity.
MEASUREMENT	Question(s) included in survey
DUE BY	December 2018
TRAFFIC LIGHT CRITERIA	Green: Question included in survey and results acted on; Amber: Question included but results not acted on; Red: Question not included
TRAFFIC LIGHT	WHITE
CURRENT POSITION	
<p>The annual survey of the City of London Community is taking place during November. The following question has been posed:</p> <p><b>Area 4: The City of London Police is responsible for law enforcement within the <a href="#">City of London</a>. The force responsible for law enforcement within the rest of <a href="#">London</a> (outside the City), is the <a href="#">Metropolitan Police Service</a>, a separate organisation. Thinking only about the City of London police, how much do you agree or disagree with the following?</b></p> <p><b>The police in this area would treat you with respect if you had contact with them for any reason</b></p> <p><b>[The police in this area] ...would treat you fairly if you had contact with them for any reason</b></p> <p><b>[The police in this area] ....would act with integrity if you had contact with them for any reason</b></p> <p><b>[The police in this area] ....are friendly and approachable</b></p> <p><b>The police understand your local concerns</b></p>	

## NOT PROTECTIVELY MARKED

2 Development Measures	
MEASURE	2.6 Explore opportunities to include integrity/ethics more explicitly in recruitment processes
OWNER	Head of Organisational Development / HR Director
AIM/RATIONALE	To build on work done last year relating to including code of ethics integrity into new recruit/staff induction processes.
MEASUREMENT	Changes made to processes
DUE BY	July 2018 (with regard to proposals) and September 2018 (for implementation)
TRAFFIC LIGHT CRITERIA	Green: Proposal made and being implemented. Amber: Proposals made but not yet implemented Red: No proposals made by the due date.
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>Best practice from some forces (e.g. Devon and Cornwall) highlights how they have incorporated a more robust ethical dimension in their recruitment, which includes requiring candidates to address questions around integrity at the application and assessment stages of the process. The proposal is to assess the extent to which the force can introduce something similar, and if feasible, implement it.</p> <p>A meeting took place between Head of Strategic Development and Deputy HR Director on 26 September 2018. The Force is adopting the College of Policing's Competency and Values framework. As the name suggests, there are component elements of this that are based on organisational values and integrity. It is being piloted for the current Ch Superintendents process and will be used for the next Inspectors process. It might be possible to enhance this further by using weighted 'filter questions', this will feature in the reviewed Development Plan for 2019.</p>	