

NOT PROTECTIVELY MARKED

POLICE INTEGRITY DEVELOPMENT and DELIVERY PLAN REPORT 2019-20 March 2019 update



NOT PROTECTIVELY MARKED

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 (then) 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			
	Mar 19			
1.1 Force has issued a statement committing to support and embed the Police Code of Ethics	GREEN			
1.2 Maintain the Force Integrity Delivery Plan	GREEN			
1.3 Maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force	GREEN			
1.4 Maintain Directorate Single Points of Contact (SPOCs) to lead on integrity within their areas	GREEN			
1.5 Maintain a process for internally and externally communicating corruption /integrity/ misconduct outcomes	GREEN			
1.6 Maintain a process to support the Force's participation in the London Panel Challenge Forum (Ethics Associates)	GREEN			
1.7 Maintain a chief officer lead on Integrity and ensure their active involvement in the oversight of the integrity plan	GREEN			
1.8 Ensure training on standards, values and leadership ethics is available for all staff	GREEN			
1.9 To adopt Authorised Professional Practice (APP) and national guidance for Force policies and procedures	GREEN			

2. Development Measures	Traffic Light Tracker			
	Mar 19			
2.1 Consider with HR/OD taking part in the long term 'ethical drift' survey	WHITE			
2.2 Consider an internal board to advise on and review key decisions and processes	WHITE			
2.3 Conduct an annual review of the Force integrity programme and implement identified improvements	WHITE			
2.4 Arrange an independent peer review of organisational integrity arrangements	WHITE			
2.5 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assessment report when published.	WHITE			

NOT PROTECTIVELY MARKED

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.

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	March 2019
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 will also be included in the 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	March 2019
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 14th 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 2019.</p>	

NOT PROTECTIVELY MARKED

1. COMMITMENT CRITERIA	
MEASURE	1.3 To maintain an integrity monitoring group to monitor integrity levels in Force and oversee implementation of integrity developments within the Force
OWNER	Head of Strategic Development
AIM/RATIONALE	To monitor activities relating to workforce and organisational integrity and drive activity with regard to integrity and transparency.
MEASUREMENT	Group exists, meets regularly and provides reports to the Professional Standards and Integrity Sub Committee
DUE DATE	March 2019
TRAFFIC LIGHT CRITERIA	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
TRAFFIC LIGHT	GREEN
CURRENT POSITION	
<p>The Integrity Standards Board is 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 December 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 February 2019 the Directorate SPOCs are as follows:</p> <p>Crime – D Service</p> <p>I&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	
MEASURE	1.5 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 2019
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 21st January 2019) (checked February 2019)</p>	

NOT PROTECTIVELY MARKED

1. COMMITMENT CRITERIA	
MEASURE	1.6 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	GREEN
CURRENT POSITION	
<p>The formal launch of the London Panel Challenge Forum took place on 15th December 2016.</p> <ol style="list-style-type: none"> 1. The Force has participated in every panel held since it began in December 2016, including hosting a number of the meetings. 2. The next meeting is 4th March 2019. CoLP is hosting meetings in May, September and December 2019. 	

NOT PROTECTIVELY MARKED

1. COMMITMENT CRITERIA	
MEASURE	1.7 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	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> <p>The Commander (Operations) additionally chairs London Police Challenge Forum panels for additional resilience.</p>	

NOT PROTECTIVELY MARKED

1. COMMITMENT CRITERIA	
MEASURE	1.8 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 & 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 @ February 2019).</p>	

NOT PROTECTIVELY MARKED

1. COMMITMENT CRITERIA	
MEASURE	1.9 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	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 February 2019).</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 1 Consider with Human Resources/Organisational Development taking part in the long term 'ethical drift' survey
OWNER	Head of Strategic Development / HR/ OD
AIM/RATIONALE	To inform Force development. The survey seeks to assess levels of ethical decline over an officer's career. This will inform long term planning around activities that can be put in place to mitigate any decline.
MEASUREMENT	Head of Strategic Development to provide ISB with details of activities supporting this indicator
DUE BY	July 2019
TRAFFIC LIGHT CRITERIA	Green: participation agreed and rolled out Amber: Activity in train (within due time) but not delivered. Red: No activity and past due date
TRAFFIC LIGHT	WHITE
CURRENT POSITION	

NOT PROTECTIVELY MARKED

2. Development Measures	
MEASURE	2.2 Consider an internal board to advise on and review key decisions and processes
OWNER	Head of Organisational Development
AIM/RATIONALE	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 2019
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	WHITE
CURRENT POSITION	
The ISB held in December 2018 allocated this as an action to the Head of Organisational Development to consider as part of the Leadership review.	

NOT PROTECTIVELY MARKED

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 2019
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	WHITE
CURRENT POSITION	

NOT PROTECTIVELY MARKED

2 Development Measures	
MEASURE	2.4 Arrange an independent peer review of organisational integrity arrangements
OWNER	Head of Strategic Development
AIM/RATIONALE	To assess the extent to which integrity related arrangements in force are sufficient and embedded, and inform development of this plan
MEASUREMENT	Review complete and action plan amended
DUE BY	September 2019
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	WHITE
CURRENT POSITION	

NOT PROTECTIVELY MARKED

2 Development Measures	
MEASURE	2.5 Address any integrity-related areas for further improvement identified by HMICFRS in their Integrated PEEL Assessment report when published
OWNER	Head of Strategic Development (and any other relevant individual identified by the report)
AIM/RATIONALE	To ensure the Force actions best practice identified by HMICFRS.
MEASUREMENT	Progress reported to Performance Management Group and ISB
DUE BY	TBC following publication of the report (anticipated late Spring 2019)
TRAFFIC LIGHT CRITERIA	Green: AFI delivered; Amber: Action in progress to deliver AFI but not fully delivered; Red: AFI not delivered by due date
TRAFFIC LIGHT	WHITE
CURRENT POSITION	