

<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Dated:</b> 18 February 2022
<b>Subject:</b> Integrity and Code of Ethics Update	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1- People are safe and feel safe
<b>Does this proposal require extra revenue and/or capital spending?</b>	N/A
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	N/A
<b>Report of:</b> Commissioner of Police Pol 15-22	<b>For Information</b>
<b>Report author:</b> Deputy Director, PSD	

### Summary

This report provides Members with an update of the work of the Force's Integrity Standards Board (ISB), regional and national activity of relevance, and an update on the Integrity Standards dashboard and the proposed delivery plan for 2022. The last update this Board received was a verbal update to your November Professional Standards and Integrity Committee (PSIC).

### Recommendation

It is recommended that the Members note this report.

### Main Report

#### Integrity Standards Board (ISB) - 10 November 2021

1. The last Force ISB meeting was held on the 10 November 2021 chaired by the Commissioner. The next meeting is scheduled for 8 February 2022, and it is not, therefore, possible to provide members with any details of that meeting in this report owing to the publication deadline.
2. At the November meeting the Force provided an update on performance and a general update on the Code of Ethics and future plans to build on existing work. It was noted that the Deputy Director, Professional Standards Department (PSD) was now the Force lead for Ethics following the retirement of the Head of Strategic Development.
3. The completion of separate Community & Victim Surveys was noted. It was noted that there was a reduction in the percentage of respondents who felt City of London Police officers would act with integrity, but no specific issues were commented on within the free text areas of the survey.

4. Although the number of respondents remains low, data shows a slight increase in satisfaction levels from victims who responded so far in both the areas of treatment received and overall satisfaction.
5. It was noted that, in general, survey return rates are lower than in previous years and that Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) is increasingly focusing on the results of victim surveys. Recent well reported incidents in the media have reinforced the importance of legitimacy, trust, and confidence in policing. The force will consider options for better engagement with victims of crime including the possibility of focus groups.
6. The number of grievances raised within the force continues to be lower than previous periods and the force had no new Employment tribunals submitted nor any tribunals held in the reporting period.
7. During the reporting period, 5 officers and 9 members of staff completed voluntary exit interviews on leaving the Force. None of the officers cited any Code of Ethics issues as being a reason for leaving the organisation. However, 3 members of staff have described these as being relevant to them leaving, specifically a lack of respect for their skills and a culture of criticism in some areas of the force. This information is being collated and feedback will be given to relevant departments and managers.
8. The Deputy Director of PSD updated that their role now includes the lead for Ethics & Integrity, taking over from the former Head of Strategic Development. The last City of London Police Challenge Panel was held in March 2021 and meetings are being planned for 2022 with the possibility of an external chair to support legitimacy and independence.

## **National & Regional Developments**

9. The Code of Ethics is to undergo a national 2-year review by the College of Policing and follows a period of consultation to agree its scope. The review aims to ensure that the Code of Ethics creates an environment that supports everyone in policing and provides greater transparency to the public about decision making and standards.
10. The London Police Challenge Forum, of which CoLP had been active members and which had considered ethical dilemmas and issues across policing in London, has been disbanded, primarily due to restructuring within the Metropolitan Police Service (MPS) and the challenges of meeting during the Covid restrictions.
11. As a result, CoLP, MPS and British Transport Police (BTP) have joined the South-West regional structure, and this is now a Wales, West and London (WW&L) regional network which met recently in January 2022. Deputy Chief Constable Sam de Reya, Dorset Police, as Chair of the WW&L Police Ethics is the regional representative to the National Police Ethics Group. Considerations included the inclusion of Ethics Advisors in Force Gold Groups and the challenge faced by many forces of encouraging colleagues to raise ethical issues.

12. The CoLP Director of Information attended a national Data Ethics Workshop in January 2022. Data ethics studies and evaluation considerations relate to the collection, retention and use of data in order to formulate and support ethical outcomes. A data ethics session was held for Members in 2021, led by the CoLP Director of Information. Only 4 members of the PSIC attended and it was agreed with the Police Authority Team that the slide pack be circulated to the remaining Members of PSIC for their information. This was completed.

### **Integrity Development Plan, Dashboard and future work**

13. All elements of the previous Integrity Development Plan were delivered or have been superseded by new objectives. A refreshed plan has been developed and is being presented to the Force ISB on the 8 February 2022. It is based on the *College of Policing - Organisational Model* (see Appendix A). As well as reflecting current College of Policing thinking, it is aligned with the HMICFRS inspection model, and it is hoped that this plan will more effectively integrate ethics into all areas of CoLP. It is presented for Members' information.

14. Assistant Commissioner Paul Betts is the new Chair of the Force Integrity Standards Board and is keen to reinvigorate and drive work forward. Members should note that the Plan is in development and the activity to deliver against the objectives is currently being scoped. There is still significant work to do in this regard with relevant business leads.

15. At a previous PSIC Committee, Members asked to see the ISB Dashboard that is scrutinised internally at Force level at the Force ISB, to gain a better understanding of the areas in which the Force challenged itself. The current Integrity Dashboard, to be submitted to the ISB on 8 February, is shown at Appendix B and is a Non-Public Appendix, as this is an internal Force document. It is presented for Members' information.

16. It is intended that CoLP Force Ethics Panels are to be reinvigorated to encourage debate and discussion, that consideration is given to the creation of Ethics Advisors who can more effectively embed the Code of Ethics into all areas of CoLP across operational strategic levels and that this work is fully integrated with the Force Equality & Inclusion strategy, in particular the Leadership and Culture strand.

### **Options**

There are no options or proposals within this report.

### **Corporate & Strategic Implications**

- Strategic implications – none.
- Financial implications – none.
- Resource implications – none.

- Legal implications – none.
- Risk implications – none.
- Equalities implications – none.
- Climate implications – none.
- Security implications – none.

### **Appendices**

- Appendix A – Integrity Delivery Plan Summary – proposed February 2022
- Appendix B – Integrity Dashboard – February 2022

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