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| <b>Committee(s):</b>   | <b>Date:</b>               |
| Professional Standards and Integrity Sub Committee                     | 6 <sup>th</sup> March 2018 |
| <b>Subject:</b><br>Integrity Dashboard and Code of Ethics Update       | <b>Public</b>              |
| <b>Report of:</b><br>Commissioner of the City of London Police         | <b>For Information</b>     |
| <b>Report author:</b><br>Stuart Phoenix, Head of Strategic Development |                            |

## Summary

### *Integrity Standards Board and Dashboard:*

The dashboard appended to this report (Appendix A) will be considered by the Force's Integrity Standards Board on 23<sup>rd</sup> May 2018, which is one day past the deadline for submission of papers to your Sub Committee; a verbal update will therefore be provided.

### *Code of Ethics Update:*

The last scheduled meeting of the London Police Challenge Forum (LPCF) took place on the 29<sup>th</sup> April 2018 with two panels running concurrently, one at Guildhall Yard East and one at Charing Cross.

The Head of Strategic Development has been invited to be a member of the Regional Ethics Board and a newly constituted national group, to be chaired by Chief Constable Julian Williams. The next regional meeting is scheduled for 15<sup>th</sup> June 2018.

The Integrity Standards Development Plan has been refreshed for 2018 and will be submitted to the Integrity Standards Board for consideration. The plan includes 5 new actions to progress and is attached to this report for information.

The Head of Strategic Development met with the Chief Superintendent I&I to assess the extent to which the staff survey results could inform new dashboard measures and new actions for the Integrity Standards Development Plan. It was agreed there is nothing in the results to inform new indicators, however, there is an opportunity to include one new action, which has been included and relates to an internal ethics board to review decisions and offer advice to other boards and managers.

## 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. At the time this report was prepared, the next Board will be the 23<sup>rd</sup> May 2018, which is past your Sub Committee's deadline for papers.
4. It follows therefore that the dashboard at Appendix A has not been considered by the Board and is presented here for information only. It should be possible to provide a verbal update regarding the dashboard to your Sub Committee, together with the usual overview of the meeting, which for the same reason cannot be included in this report.

### *Code of Ethics Update*

5. The last scheduled meeting of the London Police Challenge Forum (LPCF) took place on the 29<sup>th</sup> April 2018 with two meetings running concurrently, one at Guildhall Yard East and one at Charing Cross. The meeting at Guildhall Yard East was chaired by the Head of Strategic Development on behalf of the Commander (Operations). The Borough Commander for Westminster chaired the meeting in Charing Cross. Both panels considered the same six ethical issues, which included the following subjects:
  - a. Police officers and membership of the Freemasons;
  - b. Rewards being offered to members of the public to come forward to provide information to support investigations;
  - c. Retaining staff in acting ranks or as volunteers when they have not been successful at a board;
  - d. Voluntary interviews; and

- e. Use of Home Office biometric systems.
- 6. The findings of the panels will be circulated in due course. Members will be aware there have been issues with producing an outcome from the panels, however, it has been agreed that much shorter summaries of the discussions will be produced (compared to the almost verbatim record of discussions) which should facilitate a quicker turnaround than has been experienced to date.
- 7. The question of how these records will be stored and disseminated remains unresolved. There was a proposal that POLKA would be used, however, this has not garnered support from the Regional Leads, therefore alternatives are being explored by the MPS, who maintain a full time resource to support the LPCF.
- 8. The next LPCF is scheduled to take place on the 4<sup>th</sup> July 2018 and will be hosted by British Transport Police (BTP) and the Metropolitan Police Service (MPS).
- 9. The Head of Strategic Development (HoSD) has met with the other LPCF leads (both Chief Superintendents from the MPS and BTP) and agreed that all 3 should be members of the newly constituted Regional Board, which is being run by Professor MacVean of Bath Spa University. Chief Constable Julian Williams, who is the NPCC lead for this area is also a member of that group. Although the group has already met once (6<sup>th</sup> March), the next meeting on the 15<sup>th</sup> June will be the first attended by HoSD.
- 10. It is envisaged that through membership of the regional and national groups, the Force will be able to contribute to and benefit from being part of the latest initiatives at the development stage.

***Integrity Standards Development Plan***

- 11. The Integrity Standards Development Plan has been reviewed for 2018 and is attached to this report at Appendix B. The Plan remains in two sections covering 'commitment' actions and 'development' actions. The commitment section is intended to ensure that the Force maintains the basic structures to support integrity in the workplace. As these were implemented last year, whilst they are being maintained they will be reflected as 'GREEN'.
- 12. The development section contains 5 new areas:
  - i. Link in and participate in Regional and National boards concerned with the Code of Ethics (shown as GREEN as links have been established, however, to maintain at GREEN HoSD will need to attend, participate in and bring back developments from the groups).
  - ii. Launch an internal board to advise on and review key decisions and processes. This is to support a finding of the Staff Survey around perceived organisational unfairness relating to strategic decisions.
  - iii. To review staff survey and incorporate any relevant recommendations in this development action plan (shown as GREEN as completed, leading to the measure at (ii) above).

- iv. To include a question about public perception of integrity in the annual community survey
  - v. Explore opportunities to include integrity/ethics more explicitly in recruitment processes, particularly at the application/assessment stages
13. Updates against the Plan will be submitted to each ISB for oversight and to your Sub Committee for information.

***Staff Survey***

14. The Head of Strategic Development met with the Chief Superintendent I&I to assess the extent to which the staff survey results could inform new dashboard measures and new actions for the Integrity Standards Development Plan. It was agreed there is nothing in the results to inform new indicators, however, there is an opportunity to include one new action, which has been included and relates to an internal ethics board to review decisions and offer advice to other boards and managers, and has been included in the Development Plan. To date the concept has been shared with the Senior Leadership Team who are broadly supportive of the proposal.

***Benchmarking request to Forces for details of their integrity arrangements.***

15. Following the last ISB, Strategic Development wrote to all UK forces requesting information regarding their equivalent integrity boards. To inform further development of the Force's own dashboard, terms of reference were requested together with any details of indicators used.
16. Six forces responded. The results are summarised below:

| Force          | Details   |
|----------------|---|
| Cleveland      | Have an internal ethics committee. Only standing item is gifts and hospitality, then discusses issues referred to it (similar to LPCF). Issues that CoLP covers (complaints/vetting/business interests etc.) are dealt with by PSD governance group, and grievances/ETs by HR governance group. No indicators supplied. |
| West Yorkshire | Used to have an integrity board but now embedded in a broader People Board supported by Local Accountability Meetings with all districts and departments – Integrity is a theme. No indicators supplied.  |
| Merseyside     | Currently reviewing governance arrangements around their integrity board and new ToRs being drafted. No drafts or indicators shared.  |
| Cheshire       | ToR for Force Integrity Meeting supplied (dated Jan 2018). Covers misconduct, grievances, public complaints, vetting management, civil actions, gifts and hospitality, referrals to the IOPC, integrity issues arising from the breach of information security, crime data integrity audits and HMICFRS AFIs.           |
| Hertfordshire  | No equivalent board. Their PSD Governance Board covers most of what is included in our dashboard; finance issues monitored by individual finance units and ETs by HR/Legal Services departments. No indicators supplied.  |

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| Lincolnshire | No equivalent board. Issues within CoLP's TOR are picked up by other groups (such as IAG and PSD Governance Groups). No indicators supplied. |
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17. The volume of returns was disappointing and do not indicate there are any areas being scrutinised by other forces that are not already included on the Force Integrity dashboard.

#### *Crime audits*

18. The Force Crime and Incident Registrar (FCIR) conducts regular audits of Force compliance with Home Office Counting Rules (HOCR) and the National Crime and Incident Recording Standard (NCRS). Forces (note, not the City of London Police) have been criticised in the past for unethical crime recording and associated practices. Whilst the audits are primarily concerned with compliance, the FCIR also looks to see where results indicate unethical practices or circumstances that might be interpreted as unethical.

19. The audit reports are submitted to the Victim Code and Crime Working Group for oversight and action. The FCIR reports verbally to the Integrity Standards Board whether any of the audits reveal ethical or integrity-related issues. If such issues are identified, a written report is made.

20. Over the last quarter (March 2018 to present), the following audits have been completed:

- i. Rape
- ii. Out of court disposals
- iii. Computer Aided Despatch (CAD) records to Crime records (violence)
- iv. Transferred crimes
- v. Cancelled crimes

21. In addition to the above audits, a weekly audit is conducted on all records for any reference to modern slavery offences. No issues relating to integrity have been reported in any of the audits.

## **Appendices**

- Appendix A – Integrity Dashboard (draft – to be considered by the Integrity Standards Board)
- Appendix B – Integrity Standards Development Plan (draft – to be considered by the integrity Standards Board)

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