

Her Majesty's Inspectorate of Constabulary



Inspection of City of London Police

Professional Standards

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INSPECTION OF PROFESSIONAL STANDARDS 2005

A - INTRODUCTION AND METHODOLOGY

1. Introduction

'Professional standards' within the policing context has evolved significantly in recent years, following the HMIC thematic 'Police Integrity' (1999), the establishment of an Association of Chief Police Officers (ACPO) Presidential Taskforce to tackle corruption and the introduction of the ACPO Professional Standards Committee. Since 2000, virtually every force in England and Wales has significantly expanded the activities of pre-existing Complaints and Discipline Departments to include an element addressing anti-corruption, including covert investigation. These larger units are generically known as Professional Standards Departments (PSDs).

The issue of complaints holds a unique importance for HMIC in that legislation¹ creates a responsibility on Her Majesty's Inspectors to 'keep themselves informed' as to the handling of complaints in forces. Traditionally, this has involved inspection of individual forces on a rolling programme. The advent of HMIC's annual Baseline Assessment (from 2003/04), the establishment of the Independent Police Complaints Commission (IPCC) in 2004, and a series of public inquiries have changed the professional standards landscape significantly. In view of this, HMIC decided to carry out a simultaneous programme of inspection of professional standards in all 43 English and Welsh forces to provide a comprehensive picture of current performance and identify any issues of national importance.

2. Inspection scope

While this national programme of inspection of professional standards has focused primarily on the operation of the PSDs, and their sub-sections, it has also examined issues of professional standards in the wider policing context, and therefore touched on other departments and areas of responsibility, for example Human Resources (HR). The core elements identified nationally for examination were:

PSD

- The umbrella department within which all professional standards activities are delivered, including the investigation of complaints and misconduct and proactive anti-corruption work.

Complaints and misconduct unit

- Responsible for reactive investigations into public complaints as well as internal conduct matters.

Proactive unit

- Responsible for the intelligence-led investigation of vulnerability to or allegations of corruption.

¹ Section 15(1) of the Police Reform Act 2002

Intelligence cell

- Responsible for:
 - Overall intelligence management
 - Analysis
 - Field Intelligence
 - Financial Investigation
 - Managing risks and grading threats

Handling of civil claims, security management and personnel vetting

- Individuals or units responsible for identifying risks to the integrity of the police service manifested within civil actions, civil claims, employment tribunals, breaches of security and infiltration of the service by inappropriate personnel.

Handling 'Direction and Control' Complaints

- Processes for handling complaints relating to:
 - Operational policing policies (where there is no issue of conduct)
 - Organisational decisions
 - General policing standards in the force
 - Operational management decisions (where there is no issue of conduct)

Impact of unsatisfactory performance and grievance

- Relevant personnel within HR and operational departments, to establish that processes exist to identify any conduct issues or organisational lessons.

NB: The above list is not exhaustive nor does every force have each of these units or responsibilities as separate functions. The inspection sought to examine as many of the identified activities as are relevant to each force.

3. Methodology

Since 2003/04, HMIC's core methodology for assessing force performance has been Baseline Assessment (BA), which consists of a self-assessment process supported by visits to forces for validation and quality assurance. BA assesses performance annually across 27² areas of policing via a framework of questions for each area. The mainstream BA process for 2004/05 was completed during spring 2005 and the results published in October 2005.

Professional Standards is one of the BA frameworks and would normally have been included in the mainstream BA activity. With the full programme of professional standards inspections scheduled for October and November 2005, however, the assessment of this framework was deferred to await their outcome.

The programme of inspections has been designed to:

- Provide a full inspection of professional standards in all England and Wales³ forces;
- Gather evidence for BA reports and grading of professional standards in all forces; and
- Identify key issues, trends and good practice that may have implications for professional standards on a national basis.

² Number of frameworks in the 2004/05 assessment

³ Also including British Transport Police and Ministry of Defence Police and Guarding Agency

The standard format for each inspection has included:

- The completion of self assessment questionnaires by all forces;
- Examination of documents;
- Visits to forces with group and individual interviews;
- Consultation with key stakeholders; and
- Final reports with grade.

4. BA grading

HMIC applies a qualitative grading to the inspection of professional standards. These grades are:

- Excellent
- Good
- Fair
- Poor

In allocating individual force grades, HMIC assesses all the available evidence and identifies how well the force matches an agreed set of Specific Grading Criteria. To ensure fairness and transparency in the grading process, HMIC worked with key partners in the Association of Police Authorities, IPCC, the Home Office and ACPO to develop and agree these Specific Grading Criteria for professional standards.

The criteria set out expectations for a Good force. Grades of Fair, Good and Excellent all represent acceptable performance levels but indicate the degree to which the force has met the grading criteria. An Excellent grade indicates 'benchmark' performance including significant implementation of good practice.

The full grading criteria are set out in HMIC's website at:
www.inspectorates.homeoffice.gov.uk.

The key elements appear under four headings, namely:

- **Intelligence** - *what a force knows about the health of professional standards*
 - **Prevention** - *how the force tries to improve and prevent the abuse of standards*
 - **Enforcement** - *its effectiveness in dealing with emerging problems*
 - **Capacity and Capability** – *having the resources and skills to address reactive and proactive challenges (including timely and proportionate response to lapses in professional standards)*
- The remainder of this report is set out under these headings, for ease of reference to the evidence presented.

B – FORCE REPORT

Force Overview and Context

The City of London Police (CoLP) is responsible for the policing of London's 'Square Mile'. This covers an area of 779 acres, which stretches from the River Thames in the south to the Barbican Centre in the north, Holborn and Fleet Street to the west, and Aldgate and Liverpool Street to the east. It is also responsible for policing the Blackfriars, Millennium, Southwark, London and Tower Bridges. This area is the world's leading international centre for finance and related business services and includes a host of sensitive and high profile places of interest, including St. Paul's Cathedral, the Bank of England, Mansion House, Stock Exchange, Lloyds Building, Monument and the Central Criminal Court (Old Bailey). The area has a population of 8043 and 4421 households. However, these numbers are increased by the daily influx of some 350,000 commuters, as well as an estimated 300,000 cars.

The Headquarters is based at Wood Street, and the force is organised into two territorial divisions with six command areas. The two territorial divisions are based at Snow Hill and Bishopsgate and are responsible for the day-to-day policing of the City. Half the force staff works from these police stations, and their functions include crime prevention advice, investigating crime, patrolling, staffing the traffic and environmental zone and dealing with public enquiries. About 1200 people work for the CoLP, and around one quarter of these are civilian support staff performing a wide range of professional, administrative and some operational support roles. The ACPO team consists of the Commissioner, Assistant Commissioner and Commander. The Commissioner has been in post for three years, the Assistant Commissioner for three years and Commander for nearly five years and all are originally from outside the City of London force. The Commissioner works very closely and effectively with the Chair of the Police Committee.

Normally, a police force is identified as being most similar to other forces in terms of demography, policing environment and other socio-economic factors. However, due to the unique nature of the City of London's circumstances, it is not possible to find appropriate comparators. The CoLP is therefore not placed in a most similar force group.

Professional Standards

The Commander holds portfolio responsibility for professional standards; the PSD consists of a detective superintendent head of department (Director), one detective chief inspector (supernumerary), two detective sergeants and one detective constable (investigations) and one inspector, one detective sergeant and one detective constable (intelligence/operations). There is one sergeant data protection officer, one constable force vetting officer and finally one office manager. The department does not have its own dedicated analytical support at present.

GRADING: FAIR

Findings

Intelligence - *what a force knows about the health of professional standards*

Strengths

- In general terms National Intelligence Model (NIM) principles have been adopted by the PSD. The department undertakes tasking and co-ordination meetings every two weeks that underpin planning and drive actions.
- Staff within the PSD are skilled and experienced in undertaking professional standards investigations including the use of covert methods of investigation, the Regulation of Investigatory Powers and intelligence handling.
- The force has conducted a risk assessment of integrity and vulnerability to corruption for 2004 and 2005. For 2005 the force has identified the top three threats to the organisation as criminal association, dishonesty and other criminal behaviour. The threat assessment has been forwarded to the National Criminal Intelligence Service.

Areas for Improvement

- The PSD has produced a strategic assessment for the department in line with the NIM principles. However, flowing from this should be a PSD control strategy containing priorities for the various elements of intelligence, prevention and enforcement. Thus all proactive operational activity conducted at the tasking and co-ordinating group meetings should then make the overt link to the appropriate element of this control strategy. At the time of the inspection the PSD had not formulated such a strategy and as such no such links were apparent.

RECOMMENDATION 1

Her Majesty's Inspector recommends that the force consider producing a PSD control strategy flowing from the strategic assessment, which contains priorities for intelligence, prevention and enforcement with a view to driving business.

- The most efficient way of storing and searching the very large amounts of information that PSDs generate is through a relational database. Inefficiencies will prove frustrating and may hinder investigations. The CoLP PSD uses the Centurion database to perform this task but has concerns that this database is not user friendly. This view is also reflected by some other forces that utilise this system. However, any such difficulties are compounded by the level of understanding that staff have about the facilities available on Centurion. It is important that all staff within the PSD have a good level of working knowledge of these capabilities whilst Centurion remains the database of choice. The force may also wish to have a robust succession plan in place for staff training.

Prevention - *how the force tries to improve and prevent the abuse of standards*

Strengths

- The force has recently introduced the Ethics Working Group (EWG) under the chairmanship of the Commander. This in part is fulfilling the role of a Professional Standards Committee for the force. Now the EWG is functioning, it is the intention of the Commander to widen its membership to include representatives from both the staff associations and support groups. This is a welcome move and will go some way to addressing the concerns expressed by these groups as to their current lack of involvement in the process.
- The force has in place a variety of internal reporting channels such as the independently run 'staff line' which is the confidential telephone facility and the recently introduced 'PSD confidential' which is the confidential and anonymous e-mail facility. Although the e-mail facility is receiving worthwhile 'hits', the telephone facility is underused. Consideration should be therefore given to marketing the presence of this facility once again within the organisation.
- The force operates a comprehensive internal website for the information of its staff. However, including a section outlining 'lessons learnt' from recent cases will further enhance this facility, this having been already under development within the PSD.
- The force has in place a robust mechanism to enable the organisation to identify links between civil claims affecting the force and possible misconduct cases that may arise.
- The inspection team found a good awareness amongst front line staff of the local resolution policy and it was evident that supervisors felt confident in applying the policy in practice.
- Staff within the PSD were aware of the race equality scheme and of their responsibilities contained within it.
- There was a reasonable awareness amongst front line staff of what constituted unacceptable behaviour. The force, however, has no written document which sets out the expectations and standards expected of staff, including practical examples of conduct that is unacceptable. Distribution of a policy containing such standards would help to raise awareness of the issue.

Areas for Improvement

- The principal means of implementing a corruption prevention strategy effectively is through a professional standards strategy. Within this document the force should set out how the organisation intends to make itself more resistant to the threats of corruption from both within and without and how professional standards will be improved. Ideally, it should contain a variety of short, medium and long-term measures spelling out how this will be achieved. The CoLP's own document was introduced in 1999 and as the force has rightly acknowledged, that document is in need of updating.

RECOMMENDATION 2

Her Majesty's Inspector recommends that the force consider updating its professional standards strategy. It should contain short, medium and long-term measures outlining how the force intends making itself more resistant to the threats of corruption and how professional standards will be improved.

- A detailed security management programme should support the professional standards strategy. The programme should support this strategy by fulfilling a key role in protecting the organisation from breaches of professional standards of all kinds. It does this by delivering a series of preventative measures to provide an acceptable level of protection of police assets. The programme should address physical security, personnel security and information systems security. The greatest impact is achieved when the three types of measure are implemented collectively and managed cohesively with the individuals responsible for the programme being located within the PSD. Within the CoLP there was evidence that some good work was being performed around security management; however, there was a lack of integration and co-ordination. There is a need to incorporate the work currently being undertaken under a holistic programme. Furthermore, the PSD has a key role to play in developing and managing the measures contained within the security management programme.

RECOMMENDATION 3

Her Majesty's Inspector recommends that the force consider ways it can capture the work currently being undertaken within the organisation in relation to security management and incorporate it under one holistic programme. This programme should be actively managed by the PSD.

- The force may wish to consider ways to further expand its current options available to members of the public for making a complaint to the police by putting in place mechanisms for third party reporting, for example through the local Citizens Advice Bureau or other similar organisation. The force has the inclusion of a complaint form on the force internet site under development.
- Between April 2004 and July 2005 the City of London recorded 68 complaints. In 31 (46%) of these cases, the ethnicity of the complainant was unknown. In order to fully understand whether disproportionality exists within this area of business, the force needs to consider how it can capture this information in the future.
- The force's policy on alcohol and substance abuse testing has been under development since the beginning of the year and as yet has not been published. Although the force awaits national guidance there is no reason why an interim policy is not in place; this could be amended when further guidance becomes available.

- Although there is information on the force Internet site explaining how to make a complaint, currently there are no links that would enable a member of the public to contact the force PSD direct. The force website is in the process of being updated which when complete will incorporate this facility.
- The force could make greater use of its independent advisory group (IAG) to forge contacts with the community in professional standards matters. HMIC is aware, however, that the force, in order to enhance and improve its overall role, is reviewing the work of the IAG and hopefully this will also encompass this area of business.
- The force has not undertaken the vetting of management positions, as a decision has still to be made on which posts require such scrutiny. It is, however, work in progress and hopefully will be completed in the near future.
- There is no information regarding the force PSD, such as its contact details, within the force annual report 2004/05.

Enforcement – *the force's effectiveness in dealing with emerging problems*

Strengths

- The chief officer lead for professional standards is the Commander. However, it is evident that all the senior officers within the force from the Commissioner downwards lead, inspire, promote and support an ethical culture amongst staff.
- The Commander in his role as ACPO lead for professional standards within the force chairs various internal fora such as the EWG, suspension review meetings as well as Gold Group meetings when required. He holds regular meetings with the head of PSD to review all elements of professional standards of the force.
- The PSD has a structured system in place, which allows an early assessment of complaints; this manifests itself in the department invariably providing an appropriate response to issues. Due to the low numbers of cases involved, it is easy for the PSD senior managers to monitor and track the timeliness of case files.
- The force has fully implemented the 'Lancet' principles in accordance with the IPCC/ACPO agreement.
- The PSD has effective links with other departments within the force, particularly with the HR department.
- The force PSD has a good working relationship with both the IPCC and the local Crown Prosecution Service. As part of the inspection, contact was made with the IPCC commissioner responsible for liaison with the CoLP. The feedback gained from this discussion was extremely positive with work being carried out between the two groups in a spirit of openness and co-operation.
- The police complaints sub-committee of the Police Committee consists of independent members who closely scrutinise individual cases. This robust mechanism has in the past resulted in an improved level of timeliness for

submitted case files. They too reported a good working relationship with the IPCC commissioner.

- There is evidence of a good informal contact system between the PSD and the various support groups and staff associations, which operates during the conduct of investigations. However, it is felt that this mechanism needs placing on a more formal footing with protocols put in place setting out the levels of engagement and appropriate avenues of communication.

Areas for Improvement

- There are currently no protocols in place between the CoLP and the police complaints sub-committee on the oversight arrangements for direction and control complaints. As such there was a lack of awareness of this form of complaint amongst some key people interviewed during the inspection.

RECOMMENDATION 4

Her Majesty's Inspector recommends that the force in consultation with the Police Committee consider the formulation of a policy outlining a structured process for the ongoing scrutiny and oversight of direction and control complaints.

- The current members of the police complaints sub-committee have received no formal training in order to prepare them for their oversight role. Their ability to perform the role effectively is reliant on their previous experience as a Police Committee member as well as their life experiences outside this membership.
- The only way for staff within the PSD to currently examine the personal file of a member of the force is by visiting the HR department in person. This has the potential to compromise the enquiry from the outset. The force should examine the possibility of the PSD having a live link via a computer terminal to the personnel files within the force.

Capacity and Capability – *having the resources and skills available to address the reactive and proactive challenge and providing a timely and proportionate response to lapses in professional standards*

Strengths

- In relation to the current level of business undertaken by the PSD, there are adequate resources within the department capable of meeting both reactive and proactive demands being placed upon it. However, it was evident during the inspection that the proactive side of the department's work was on the increase and it is felt that consideration will need to be given in the not too distant future as to whether the present resourcing levels are suitable to meet future demand. Current caseloads are reported as being manageable.
- There is a strong need for total confidentiality surrounding the work of a PSD. The physical security of such a department's working environment is crucial to this. If this becomes a weak link in the chain, then this results in confidentiality being breached. The PSD within the City of London has

recently moved to standalone premises with a high level of physical security. In addition, it has differing levels of security within the department and ease of access for different functions. There is a sterile corridor in existence between the functions of intelligence and investigation. Database security is also present.

- Locating the PSD within non-police premises has provided benefits in relation to the maintenance of anonymity of witnesses and victims and thus the willingness of people to attend the PSD to discuss issues; this in turn aids the effective investigation of complaints.
- Even though the force is small, it does undertake a limited amount of proactive work on anti-corruption matters, utilising a range of tactical options. This includes benefiting from sound collaborative arrangements with neighbouring forces, for example in providing a surveillance option when this is more appropriate than using its own resource.
- The force provides a good level of support for staff suspended from duty. There is also an effective system in place for reviewing cases involving suspended members of staff.
- The force has rightly recognised the need for its senior officers to receive appropriate training in relation to panel hearings. This training is scheduled to take place in December 2005.
- The City of London PSD hosts the south-east regional PSD group meetings every three months.

Areas for Improvement

- Analysed intelligence is required to build intelligence products, which help to formulate strategy, enable the impact of tactics to be assessed and assist in driving tactical operations. Competent analysts are therefore vital to a PSD if the standards inherent in the NIM are to be reached. Currently, the PSD has no dedicated analytical capacity and is limited to borrowing the services of a qualified analyst from elsewhere within the force when required.
- The post of detective chief inspector within the PSD is currently supernumerary to establishment. In order to ensure resilience for the future at the senior management level, particularly as the preventative and proactive emphasis of professional standards is enhanced, the force should consider the need to make this post permanent.
- There is no structured programme in place for the provision of training to front line staff on PSD related matters. The input is primarily reliant on one officer within the PSD delivering the material to members of the force alongside performing his key role within the intelligence unit of the PSD. Although the quality and effectiveness of this training is not in question, the force may wish to place the work of this dedicated individual on a more formal footing and also consider the issue of succession planning should this officer decide to leave the department.
- There is a lack of staff resilience in the vetting and data protection areas of the business.

C - GLOSSARY

ACPO	Association of Chief Police Officers
BA	Baseline Assessment
CoLP	City of London Police
EWG	Ethics Working Group
HMIC	Her Majesty's Inspectorate of Constabulary
HR	Human resources
IAG	Independent Advisory Group – a body advising a force or basic command unit on race and diversity issues
IPCC	Independent Police Complaints Commission
NIM	National Intelligence Model
PSD	Professional standards department