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**Lancashire
Constabulary**
police and communities together

REPORT TO: JOINT AUDIT COMMITTEE
DATE: 2 March 2015
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LANCASHIRE CONSTABULARY - INTEGRITY AND STANDARDS UPDATE

1 Issue for Consideration

National and Local Developments around the 'Ethics' agenda.

2 Information

National

On Friday 30th January 2015, Her Majesty's Chief Inspector of Constabulary's (HMIC) released their findings from their 2014 inspection of police forces around Integrity and Leadership. The report is titled '*Integrity Matters*'.

In summary the report finds that police forces nationally have made significant progress in putting in place processes to prevent and tackle corruption, which in part is due to strong leadership being demonstrated by senior police officers.

The HMIC inspection found no evidence to suggest that corruption is endemic within the police service with the overwhelming majority of officers and staff being honest and professional. The report does however, highlight concern around consistency and some forces lacking the capability to proactively seek out and prevent corruption.

The report acknowledges that public interest in issues surrounding police integrity is unlikely to diminish and concerns will continue around institutional shortcomings, and cases of individual members conduct which fall below the standards expect by the public.

The findings also detail how police forces have responded to the 125 areas for improvement made by the HMIC in their previous inspections, 2011 (*Without Fear or Favour*) and 2012 (*Revisiting Police Relationships*). The report concludes, that in general the arrangements police forces have implemented to promote integrity are in appreciably

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better shape than they were, and this inspection found progress had been made in 122 of the identified areas, although some forces had made less progress than others.

This latest report `Integrity Matters` identifies 14 recommendations (Appendix A) for Police Service to consider and implement in order to provide greater clarity and consistency in the dealing with misconduct, and the prevention and identification of corruption. The timescale for completion for most of these recommendations is the 31st August 2015.

Local

The Constabulary will continue with its cultural change programme throughout 2015, and the Ethics Programme is an integral part of this journey.

In order to ingrain ethics and integrity within our culture, a clear commitment to values based leadership is pivotal in establishing an environment where ethical behaviour runs through the heart of all our business. Ethics has been placed at the centre of our policing mission, delivered through the PCC's Policing Plan and the Chief Constable's Ambition.

To assist, the Constabulary has engaged with the Institute Business Ethics (IBE), which is a non-profit professional organisation that encourages high standards of business behaviour based on ethical values.

The Director of the IBE is Phillipa Foster Back CBE, who the PCC has recently appointed as the Chair of the Lancashire Ethics Committee.

Work also continues to embed the Code of Ethics as it becomes a key part of how Lancashire delivers police professionalism. In order to support this, the Constabulary is in the process of benchmarking our current position through the use of organisational stress question sets. The results of which are currently being analysed.

In putting the programme into practice in 2015, the force will focus on seven key areas:-

1. Focus on our Purpose, Values Leadership and culture.
2. Develop Leaders.
3. Make decisions which are valued based and show that we really care.
4. Harness diversity to challenge "Group Think", with constructive dissent.
5. Win Hearts as well as Minds, engage partners and empower colleagues.
6. Measures what really matters to us, and escape short-termism.
7. Reward and recognise value based behaviours.

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In addition to these key areas the following priorities will run parallel;

- Recruitment of Lancashire Ethics Committee members, together with, a corresponding Internal Tactical Ethics Group to guide and challenge thinking.
- The Lancashire Police and Crime Commissioners office will review the Policing Plan.
- Review of the Constabulary's Ambition and Values to produce a common understanding and our own Code of Ethics Practice.
- Creation of our Ethics Policy and review of all associated policies to ensure all processes are aligned.
- `One to One` discussions with Commanders and SMT members on the meaning of ethics and values led leadership to promote wider debates and challenges.
- Continued relationship building with IBE and ACPO/OPCC to provide external support and education.
- Survey the general public for views as to appropriateness of sanction outcomes based upon various scenarios.

In order to measure our progress it is intended that the quarterly Integrity and Standards Board meetings will scrutinise progress and report into the People Portfolio meeting, chaired by the DCC Rhodes who will also lead on the Constabulary's Ethics Programme.

The Lancashire Police and Crime Commissioner have also allocated £20k of POCA funding to support the programme, throughout 2015.

Audit

As reported previously the Force Audit Team was formed in April 2014, as it was recognised that good data quality is fundamental to the effectiveness of operational policing, and also provides the force with assurances around the integrity of information held, compliance with legislation.

To date the Constabulary has seen a revise of its annual audit plan and completion of the following audits, ANPR, Multi Agency Sharing Hub (MASH), Crime 2, and the C3PO custody system.

Scrutiny of our auditing is now through the new Information Governance Board (IGB), previously the Information Assurance Board. The board sits quarterly and is chaired by Mr Ian Cosh, the Director of Resources and SIRO. The new IGB is responsible for approving the strategic information audit programme and considers which compliance reports/action plans will follow.

The Constabulary is currently populating the annual audit plan for 2015/2016. However it is anticipated that there will be more requests than can be completed within the time-frame for 2015/2016, so running alongside the annual plan will be a strategic three year rolling programme of information management audit work, which will be based on areas of

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perceived risk and/or areas where reassurance might be sought, based on local and/or national factors.

This programme will form the basis for selection of audits for future annual audit plans or be dictated by prevailing business need, emerging risks.

Decision Required

The Committee is asked to note the update.

Background Papers

Appendix A – HMIC `Integrity Matters` Recommendations

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APPENDIX `A`

HMIC `Integrity Matters` Recommendations

1. The Home Office, when considering the responses to its consultation “Improving Police Integrity”, should work with the College of Policing and the relevant national policing leads to

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establish whether the regulatory and legislative framework allows forces to understand clearly the distinction between those activities that should be treated as misconduct and those that should be treated as police corruption.

2. Within three months of the Home Office announcing its proposals in response to its consultation “Improving Police Integrity”, the relevant national policing leads should issue clear guidance to police forces and the National Crime Agency on:

- the regulations that should be used by professional standards departments to deal with any issue of police misconduct; and
- the legislation that should be used by anti-corruption units to deal with any cases of corruption.

3. With immediate effect, all forces should ensure that the initial assessment of all public complaints is conducted by a chief inspector or police staff equivalent in accordance with:

- Police (Complaints and Misconduct) Regulations 2012, Regulations 30 and 33 – in respect of public complaints, and
- Police (Conduct) Regulations 2012, Regulation 3(5) – in respect of internal misconduct reports.

4. By 31 August 2015, chief constables should review the number of officers and staff with protected characteristics who have formal allegations made against them, to ensure that force processes are operating without bias or discrimination.

5. By 31 August 2015, the Home Office should ensure that all forces record reported misconduct in a consistent manner.

6. By 31 August 2015, all forces should have systems in place to publish the outcomes of all misconduct cases including those involving criminal and corrupt behaviour.

7. By 31 August 2015, all forces should have in place a confidential means of reporting wrongdoing, in which officers and staff have confidence.

8. By 31 August 2015, the College of Policing and the relevant national policing lead should issue guidance to all forces about the support that forces should provide to those officers and staff who report wrongdoing.

9. By 31 August 2015, all forces should ensure that their policies on the acceptance of gifts and hospitality comply with the national guidelines. By the same date, all officers and staff should be reminded of the policies.

10. By 31 August 2015, all forces should comply with national vetting policies.

11. By 31 August 2015, in order to identify potential corruption, all forces should have systems in place to assess annually:

- whether information on approved business interests remains up to date, and is appropriate;

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- where business interests have not been approved, that this decision has been complied with;
- whether information in respect of notifiable associations remains up to date and is appropriate; and
- registers concerning procurement of services.

12. By 31 August 2015, all forces should ensure they have the necessary capability and capacity to develop and assess corruption-related intelligence in accordance with the authorised professional practice.

13. By 31 August 2015, all chief constables should satisfy themselves that they have processes in place to ensure that investigations into misconduct by officers and staff resulting in “no further action” are fair and free of any form of discrimination.

14. By 31 August 2015, all forces should ensure that there is sufficient analytical capability to analyse threats, risks, harms and trends in respect of misconduct, criminality and corruption in support of professional standards departments and anti-corruption units.