

# Ethics and Integrity Framework

## Introduction

The policing profession has a duty to protect the public and prevent crime. The public expect every person within the profession to fulfil this duty by being fair and impartial and giving a selfless service.

While the great majority of people in policing act with honesty and integrity, any unprofessional behaviour detracts from the service provided to the public and harms the profession's reputation. As such, the integrity approaches and resources are diverted by repeated reviews, investigation and disciplinary procedures.

I believe that leadership, management and supervisors should move to a stance of active promotion of integrity, rather than continuing firefighting crisis upon crisis.

To achieve this goal, I have developed and implemented a comprehensive ethics and integrity framework that builds on and consolidates the extensive work already in place in Lancashire. The framework sets out

- the standards and behaviours that the public can expect from me and my Office;
- how I am accountable to the public, and how the public can in turn hold me to account; and
- how I hold the Chief Constable of Lancashire to account in the important areas of standards, public life and public service.

## Standards and behaviours that the public can expect from me and my Office

Ethics and integrity lie at the heart of everything I do in my role as Police Crime Commissioner for Lancashire. By ethics, I mean the values and behaviours which underpin all of my work and the work of Lancashire Constabulary.

When entering office I undertook to abide by an Ethical Code of Conduct and adopted the Ethical Framework for Police and Crime Commissioners which has been developed by the Association of Police and Crime Commissioners (APCC) following discussions with the Committee on Standards in Public Life (CSPL).

This Ethical Framework allows transparency in all areas of my work as a Police and Crime Commissioner. These principles encompass my work locally and whilst representing the communities I serve in national forums. The Ethical Code of Conduct is attached at Appendix A with examples of how these are achieved.



ANDREW SNOWDEN.  
1.6.21. (PCC)

Received



A.M. HARRISON  
DIR GEN  
1.6.21.

## **How I am accountable to the public, and how the public can in turn hold me to account**

I am elected by the people of Lancashire, and I am directly accountable to the electorate.

The Police and Crime Panel for Lancashire, which comprises representatives from each district and unitary authorities, plus two independent members, is another mechanism by which I am held accountable. The Panel's role includes reviewing the Police and Crime Plan, Annual Report and both scrutinising and supporting me in holding the Chief Constable to account.

The Panel has a number of powers and responsibilities. These include:

- The power to veto (by two-thirds majority) the proposed precept and the proposed candidate for Chief Constable.
- Reviewing the draft Police and Crime Plan and make recommendations to which I (as PCC) must have regard.
- Reviewing my Annual Report and make reports and recommendations at a public meeting, which I must attend.
- Asking Her Majesty's Inspector of Constabulary (HMIC) for a professional view, should I intend to dismiss the Chief Constable.
- Holding confirmation hearings for my proposed chief executive and chief finance officer appointments.
- The Panel is required to hold a minimum of four public meetings a year. Papers can be accessed here.

### **Allegations and Complaints against the Police and Crime Commissioner**

Any complaints made against me go to the Panel for consideration and investigation.

### **Joint Audit and Ethics Committee**

The Chief Constable and I have established a Joint Audit and Ethics Committee to provide advice and support to myself and the Chief Constable on matters relating to the ethics and integrity of policing in Lancashire. The Committee comprises of five Independent Advisors and will consider issues such as standards of behaviour, use of force, etc.

The Terms of Reference of the Joint Audit and Ethics Committee are available here [\[add link\]](#).

## **How I hold the Chief Constable to account in the important areas of standards, public life and public service**

Lancashire Police are guided by the new College of Policing's Code of Ethics.

Holding the Chief Constable to account is a continuous process. Through my Police and Crime Plan and supported by my office and the Joint Audit and Ethics Committee, I will hold the Chief Constable explicitly to account for promoting ethical behaviour and embedding the College of Policing's Code of Ethics into Lancashire Constabulary.

## **Scrutiny Programme**

My office operates a thorough scrutiny programme, which analyses Lancashire Constabulary's service performance and financial performance against a number of areas including:

- My Police and Crime Plan;
- Performance against a number of crime types across Lancashire as a whole.
- Budgetary controls;
- Performance against the medium term financial plan; and
- Reports on areas within corporate support such as HR, IT and Estates.

## **Complaints**

I oversee Lancashire Constabulary and have responsibility for ensuring that the police force is efficient, effective and fair. My office has a process for looking into complaints that are made, and where matters are not within my remit (e.g. those matters that are to do with operational policing or a complaint against a police officer or staff, other than the Chief Constable); my office will pass those complaints to Lancashire Constabulary to respond.

As Police and Crime Commissioner, whilst I am only responsible for dealing with complaints about the conduct of the Chief Constable, not those against rank and file officers, from 1 February 2020, the Policing and Crime Act 2017 placed a mandatory requirement upon Police and Crime Commissioners to carry out reviews of police complaints regarding complaints made after this date.

[Complaints process]

The Joint Audit and Ethics Committee undertakes dip sampling of complaints made against police officers and staff of Lancashire Constabulary.

## **Monitoring of the Professional Standards Department, and of high professional standards**

I am committed to ensuring that the highest possible professional standards are embedded across Lancashire Constabulary. Where misconduct or errors of judgement do occur, I will ensure a fair and rigorous disciplinary process.

I publish a 6 month performance report on matters pertaining to police professional standards.

**ETHICAL CODE OF CONDUCT FOR THE POLICE AND CRIME COMMISSIONER FOR LANCASHIRE**

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**1. INTRODUCTION**

- 1.1. This Ethical Code of Conduct (Code) applies to me in the office of Police and Crime Commissioner when acting in that role.
- 1.2. This Code does not apply when I am acting in a purely private capacity.
- 1.3. I have adopted this Code and have agreed to abide by its provisions.
- 1.4. The Policing Protocol<sup>1</sup> provides that "*All parties will abide by the seven principles set out in Standards in Public Life: First Report of the Committee on Standards in Public Life*" (known as the Nolan Principles). "
- 1.5. I agree to abide by the Nolan Principles which are set out below.

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<sup>1</sup> The Policing Protocol Order 2011 No. 2744

## **THE SEVEN PRINCIPLES OF PUBLIC LIFE**

### **SELFLESSNESS**

*Police and Crime Commissioners should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.*

It is important that local communities remain at the heart of my work and that I stand up for local people and principles.

Gifts and hospitality that are accepted as well as declined are recorded and available for inspection on my website. This provides that the public are fully aware of any gifts and or hospitality that I have been offered. This makes the process open and transparent and avoids any misrepresentation. The Register of Gifts and Hospitality will be continually updated by my office, and scrutinised by the Monitoring Officer.

[link to Gifts and hospitality register]

### **INTEGRITY**

*Police and Crime Commissioners should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.*

Following my election to office, on 12 May 2016 I pledged my oath to represent 'all sections of the public without fear or favour.' Where I have a disclosable interest (or other interest) in any business of my office I shall declare that interest. If I consider that interest to be substantial I will not take part in the business to be transacted.

[link to register of disclosable interests]

I have put in place a 'whistle-blowing' procedure policy to encourage and enable members of my staff to raise serious concerns within my office.

[link to Whistle blowing policy]

### **OBJECTIVITY**

*In carrying out public business, including making public appointments, awarding contracts or recommending individuals for rewards and benefits, Police and Crime Commissioners should make choices on merit.*

The people of Lancashire play a key role as to how my Police and Crime Plan is put into practice.

My Plan lays out how I and the Chief Constable aim to make the communities of Lancashire Police safer.

### **ACCOUNTABILITY**

*Police and Crime Commissioners are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.*

The strategic decisions I make are published in the form of decision logs on my website. Decision logs are a concurrent record of the development of policing services and the reasons for those decisions made. Before taking a decision I consider whether I have a disclosable interest in the matter and take the decision in compliance with the Nolan Principles.

I have established a Joint Management Board which allows myself and the Chief Constable to exercise our respective roles in a transparent manner. All meeting minutes are published. This promotes transparency and allows the public to be aware of the developments within the Force.

[Commissioner's Decisions]  
[Joint Management Board]

## **OPENNESS**

*Police and Crime Commissioners should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.*

My website is compliant with The Elected Local Policing Bodies (Specified Information) Order 2011. There is a range of information accessible on the website, including confidential reporting policy and information disclosure.

[Transparency]

I keep Lancashire communities informed through a newsletter, social media as well as through public engagements.

My office issues regular proactive press releases about the work I conduct and responds rapidly to other media enquiries.

[Newsletter]  
[Latest news]

In order for me to discharge my functions effectively there is a requirement for information in the possession of Lancashire Constabulary to be shared with me. A reciprocal sharing of information from myself to Lancashire Constabulary will also be required to assist in the discharge of our respective functions or for policing purposes.

[Information Sharing Agreement]

## **HONESTY**

*Police and Crime Commissioners have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.*

I act solely in the public interest whilst exercising the functions of my office.

My website is accessible to members of the public and I openly publish a Register of Disclosable Interests and a Register of Gifts and Hospitality. I also publish information regarding resources and assets, contracts and invitations to tender.

My anti-fraud and corruption strategy highlights the importance of honesty for me, in my office, and in working practices.

[link to Anti-Fraud and corruption strategy]

## **LEADERSHIP**

*Police and Crime Commissioners should promote leadership and support the Nolan Principles by leadership and example.*

When entering office I undertook to abide by a Code of Conduct and have developed the Ethical Framework for Police and Crime Commissioners which has been developed by the Association of Police and Crime Commissioners (APCC) following discussions with the Committee on Standards in Public Life (CSPL).

[Code of Conduct]

In addition, to the Nolan Principles, I also adopt the following principles from the College of Policing's Code of Ethics:

## **FAIRNESS**

*All people should be treated fairly.*

## **RESPECT**

*All people should be treated with respect.*

## **2. OATH OF OFFICE**

On the 10 May 2021 I swore the following oath:

I Andrew Snowden of .....do hereby declare that I accept the office of Police and Crime Commissioner for Lancashire.

In making this declaration, I solemnly and sincerely promise that during my term of office:

I will serve all the people of Lancashire in the office of Police and Crime Commissioner.

I will act with integrity and diligence in my role and, to the best of my ability, will execute the duties of my office to ensure that the police are able to cut crime and protect the public.

I will give a voice to the public, especially victims of crime, and work with other services to ensure the safety of the community and effective criminal justice.

I will take all steps within my power to ensure transparency of my decisions, so that I may be properly held to account by the public.

I will not interfere with the operational independence of police officers.

## **3. GENERAL OBLIGATIONS**

**3.1.** I agree:-

(a) To treat others with dignity and respect.

(b) Not to use bullying behaviour or harass any person.

(c) Not to conduct myself in a manner which:-

(i) is contrary to the Policing Protocol or any other legal requirement relevant to my role, and/or

(ii) could reasonably be regarded as bringing my Office into disrepute.

(d) To respect the impartiality of officers and not to obstruct or interfere with any officer who may be discharging any responsibilities placed upon them by law.

## **4. USE OF RESOURCES**

**4.1.** I agree:-

(a) to uphold the political impartiality of the Office of the Police and Crime Commissioner.

(b) Not to use the resources of the Commissioner for my personal benefit or for the benefit of my family, my friends, or any other person in relation to any business interest of mine.



(c) Not to use the resources of the Commissioner improperly or for political purposes (including party political purposes).

(d) To claim expenses and allowances only in accordance with the published expenses and allowances scheme of the Commissioner.

## **5. REGISTER OF DISCLOSABLE INTERESTS (INCLUDING THOSE OF A PECUNIARY NATURE) AND REGISTER OF GIFTS AND HOSPITALITY**

### **5.1. I agree:-**

(a) To act solely in the public interest and in exercising the functions of my office not act to gain financial or other benefits for myself, my family, my friends, or any person in relation to any business of mine or use or attempt to use my office to confer or secure for any person, including myself, an advantage or a disadvantage.

(b) Within 28 days of taking office to enter in the Register of Disclosable Interests, maintained by the Monitoring Officer, every disclosable interest know to me, as set out in the attached Schedule A.

(c) Within 28 days of becoming aware of any new disclosable interests or of any change to a registered disclosable update the Register of Disclosable Interests accordingly.

(d) Within 28 days of receipt, to register the acceptance of any gift or hospitality worth £25 or more in the Register of Gifts and Hospitality. (Further information on registering gifts and hospitalities is attached at Schedule B.)

(e) If the nature of the disclosable interest is such that I and the Monitoring Officer consider that disclosure could lead to me or a person connected with me being subject to violence or intimidation, then any entry in the Register of Disclosable Interests should not include details of the interest but should indicate that the interest has been disclosed and is withheld by virtue of this section of the Code.

(f) If I am in any doubt about whether something could be considered a disclosable interest, I will consult the Monitoring Officer, or in their absence the Deputy Monitoring Officer.

## **6. DISCLOSURE OF INTERESTS**

**6.1.** In any case where exercising the functions of my office I have a disclosable interest (or other interest), which has become known to me, in the business to be transacted, I shall as soon as possible declare such interest. Where I determine the interest to be substantial I will not take part in the business to be transacted.

**6.2.** I will consider an interest to be substantial that I should not exercise the function personally, if it meets the following test:

*"a member of the public with knowledge of the relevant facts, would reasonably consider the interest so significant that it would be likely to prejudice my judgement on the decision"*

**6.3.** Where I determine an interest to be substantial I will withdraw from any discussion or decision regarding the item and delegate authority to the Director or the Chief Finance Officer of the Office of the Police and Crime Commissioner to act on my

behalf. If there is a question about whether the matter may be delegated, I will seek the advice of the Monitoring Officer.

## **7. DISCLOSURE OF INFORMATION**

**7.1.** I agree not to disclose information given to me in confidence or information acquired by me which is of a confidential nature, unless I have the consent of a person authorised to give it or I am required by law to do so or for the lawful purposes of my office provided that I shall not be prevented from disclosure to a third party for the purpose of obtaining professional legal advice where the third party agrees not to disclose the information to any other person.

**7.2.** Any disclosure made by me shall be reasonable, be in the public interest and made in good faith.

**7.3.** I agree not to prevent another person from gaining access to information to which that person is entitled by law.

## **8. TRANSPARENCY**

**8.1.** A Register of Disclosable Interests, and a Register of Gifts and Hospitality will be maintained and will be published on my website. Further any disclosable interest that I declare will be recorded.

## **9. COMPLAINTS**

**9.1.** I acknowledge that in accordance with legal requirements any complaint about the conduct of the Police and Crime Commissioner shall be referred to the Police and Crime Panel for Lancashire.

## SCHEDULE A

### Disclosable Interests

In this Schedule:

“body in which the relevant person has a beneficial interest” means a firm in which the relevant person is a partner or a body corporate of which the relevant person is a director, or in the securities of which the relevant person has a beneficial interest;

“director” includes a member of the committee of management of an industrial and provident society;

“land” excludes an easement, servitude, interest or right in or over land which does not carry with it a right for the relevant person (alone or jointly with another) to occupy the land or to receive income;

“elected local policing body” means the elected Local Policing Body of Lancashire.

“relevant period” means the period of 12 months ending with the day on which the relevant person makes an entry, amendment, or deletion in the Register of Disclosable Interests.

“relevant person” means the Police and Crime Commissioner for Lancashire.

“securities” means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000(b) and other securities of any description, other than money deposited with a building society.

A 'disclosable interest' is an interest of the relevant person within the following descriptions.

<b>Subject</b>	<b>Disclosable Interest</b>
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	Any payment or provision of any other financial benefit (other than from the elected local policing body) made or provided within the relevant period in respect of any expenses incurred in carrying out duties and responsibilities, as a Police or Deputy Police and Crime Commissioner, or towards the election expenses of the PCC or Deputy PCC. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992(a).
Contracts	Any contract which is made between the

	<p>relevant person (or a body in which the relevant person has a beneficial interest) and the elected local policing body –</p> <p>(a) under which goods or services are to be provided or works are to be executed;</p> <p>and</p> <p>(b) which has not been fully discharged.</p>
Land	Any beneficial interest in land which is within the area of the elected local policing body.
Licences	Any licence (alone or jointly with others) to occupy land in the area of the elected local policing body.
Corporate tenancies	Any tenancy where (to your knowledge) <ul style="list-style-type: none"> <li>(a) the landlord is LBHF</li> <li>(b) the tenant is a body in which the relevant person has a beneficial Interest.</li> </ul>
Securities	Any beneficial interest in securities of a body where – <ul style="list-style-type: none"> <li>(a) that body (to the relevant person' knowledge) has a place of business or land in the area of the elected local policing body; and</li> <li>(b) either – <ul style="list-style-type: none"> <li>(i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body, or</li> <li>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.</li> </ul> </li> </ul>
Gifts and Hospitality	The name and address of any person from whom the relevant person has received a gift or hospitality (and a description of the gift or hospitality) with an estimated value of at least £25.

## **SCHEDULE B**

### **OFFICE OF THE POLICE & CRIME COMMISSIONER FOR LANCASHIRE REGISTERING GIFTS & HOSPITALITY**

1. As a general rule offers of gifts or hospitality should be refused courteously in a manner that does not cause offence or embarrassment to the organisation or individual making the offer.
2. If consideration is being given to accepting a gift or hospitality, the Monitoring Officer, or in their absence the Deputy Monitoring Officer, should be consulted prior to a decision being taken. In deciding whether a gift should be accepted the following points should be considered:
  - Why is the offer being made?
  - What are the background circumstances to it?
  - Does the donor feel obliged to make the offer?
  - What could be the outcome if the offer is accepted or declined?
  - Would the Commissioner be prepared to justify its acceptance to the public?
3. Any gifts and hospitality worth £25 or over should be registered.
4. Details of the donor (for example, the person, company or body) offering the gift or hospitality must also be registered.
5. Only gifts received in connection with official duties or in the course of employment must be registered. Other gifts and hospitality, such as birthday gifts from family, do not have to be registered.
6. An accumulation of small gifts received from the same donor over a short period of time, with an estimated combined value of £25 or more, should be registered.
7. The gift and hospitality and details of the donor must be registered within 28 days of receipt, and if an accumulation, when it is estimated that the value has reached £25.
8. If the value of the gift or hospitality cannot be ascertained it should be registered in any case as a matter of good practice.
9. It is accepted that on rare occasions gifts, or hospitality may be received without prior offer or warning. Where possible they should be diplomatically returned or refused. Where this is not possible the gift, or hospitality should be registered stating the nature, estimated value of the item and clearly stating the surrounding circumstances.
10. For the avoidance of doubt, hospitality is defined as any food, drink, accommodation or entertainment provided free of charge or heavily discounted.

