Police Authority Board

Date:	**THURSDAY, 16 MAY 2019**
Time:	**11.00 am**
Venue:	**COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL**

Members:	Douglas Barrow
	Deputy James Thomson
	Nicholas Bensted-Smith
	Deputy Keith Bottomley
	Tijs Broeke
	Simon Duckworth
	Alderman Emma Edhem
	Alderman Alison Gowman
	Christopher Hayward
	Alderman Ian Luder
	Andrew Lentin (External Member)
	Deborah Oliver (External Member)
	Deputy Henry Pollard
Enquiries:	**Alistair MacLellan**
	alistair.maclellan@cityoflondon.gov.uk

Lunch will be served in Guildhall Club at 1PM
NB: Part of this meeting could be the subject of audio or video recording

John Barradell
Town Clerk and Chief Executive

FUTURE MEETING DATES (all at 11.00am)
11 July 2019
19 September 2019
24 October 2019
28 November 2019

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **ORDER OF THE COURT OF COMMON COUNCIL**
   To receive the Order of the Court of Common Council dated 25 April 2019 appointing the Police Authority Board for the ensuing year.

   For Information
   (Pages 1 - 2)

4. **ELECTION OF CHAIRMAN**
   To elect a Chairman in line with Standing Order 29.

   For Decision

5. **ELECTION OF DEPUTY CHAIRMAN**
   To elect a Deputy Chairman in line with Standing Order 30.

   For Decision

6. **MINUTES**
   To agree the public minutes and non-public summary of the meeting held on 4 April 2019.

   For Decision
   (Pages 3 - 8)

7. **OUTSTANDING REFERENCES**
   Joint report of the Town Clerk and Commissioner.

   For Information
   (Pages 9 - 12)

8. **MINUTES - ECONOMIC CRIME BOARD**
   To receive the draft public minutes and non-public summary of the Economic Crime Board meeting held on 5 April 2019.

   For Information
   (Pages 13 - 18)

9. **APPOINTMENT OF COMMITTEES 2019/20, APPOINTMENTS TO OTHER BODIES, TERM LIMITS AND CITY OF LONDON POLICE AUTHORITY MAPPING EXERCISE**
   Report of the Town Clerk.

   For Decision
   (Pages 19 - 32)

16.   **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

17.   **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

18.   **EXCLUSION OF THE PUBLIC**
      MOTION - That under Section 100(A) of the Local Government Act 1972, the public
      be excluded from the meeting for the following items on the grounds that they involve
      the likely disclosure of exempt information as defined in Part I of Schedule 12A of the
      Local Government Act.

                                                                              For Decision

                              Part 2 - Non-Public Agenda

19.   **NON-PUBLIC MINUTES**
      To agree the non-public minutes of the meeting held on 4 April 2019.

                                                                              For Decision
                                                                            (Pages 153 - 158)

20.   **NON-PUBLIC OUTSTANDING REFERENCES**
      Joint Report of the Town Clerk and Commissioner.

                                                                           For Information
                                                                            (Pages 159 - 160)

21.   **NON-PUBLIC MINUTES - ECONOMIC CRIME BOARD**
      To receive the draft non-public minutes of the Economic Crime Board meeting held
      on 5 April 2019.

                                                                           For Information
                                                                            (Pages 161 - 164)

22.   **NON-PUBLIC MINUTES - POLICE ACCOMMODATION WORKING PARTY**
      To receive the non-public minutes of the Police Accommodation Working Party
      meeting held on 4 April 2019.

                                                                           For Information
                                                                            (Pages 165 - 168)

23.   **COMMISSIONER'S UPDATES**
      The Commissioner to be heard.

                                                                           For Information

24.   **DELIVERY OF OPERATIONAL COMMITMENT WITHIN BUDGET 19/20**
      Report of the Commissioner – TO FOLLOW.

                                                                           For Information

25. **BREXIT UPDATE**
   The Commissioner to be heard.

   For Information

26. **VARIATION TO THE MEMORANDUM OF AGREEMENT FOR THE POLICE NATIONAL ENABLING PROGRAMME BETWEEN CITY OF LONDON CORPORATION AND POLICE ICT COMPANY**
   Report of the Commissioner.

   For Decision
   (Pages 169 - 174)

27. **WAIVER REPORT FOR THE POLICE FLEET MAINTENANCE SUPPLY CHAIN**
   Report of the Commissioner.

   For Decision
   (Pages 175 - 180)

28. **21 NEW STREET AND 6-7 COCK HILL - OPTIONS FOR CONTINUED OCCUPATION BEYOND MARCH 2025**
   Report of the City Surveyor.

   This report was considered by the Police Accommodation Working Party at its meeting on 4 April 2019, and the Working Party's recommendation is set out at Item 22.

   For Decision
   (Pages 181 - 188)

29. **GATEWAY 5 ISSUE - ACTION AND KNOW FRAUD CENTRE - PROGRAMME TEAM**
   Report of the Commissioner.

   For Decision
   (Pages 189 - 204)

30. **GATEWAY 2 ISSUE - THE EMERGENCY SERVICES MOBILE COMMUNICATION PROGRAMME (ESMCP)**
   Report of the Commissioner.

   For Decision
   (Pages 205 - 214)

31.   **GATEWAY 3/4 ISSUE - DIGITAL INTERVIEW RECORDING SOLUTION**
Report of the Commissioner.

This report was approved by the Projects Sub-Committee at its meeting on 24 April 2019.

For Decision
(Pages 215 - 222)

32.   **S22A AND S23 COLLABORATION AGREEMENT - FIRST CONTACT - PROVISION OF SERVICES**
Report of the Commissioner.

For Information
(Pages 223 - 228)

33.   **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

34.   **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE BOARD AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

ESTLIN, Mayor	**RESOLVED:** That the Court of Common Council holden in the Guildhall of the City of London on Thursday 25th April 2019, doth hereby appoint the following Committee until the first meeting of the Court in April, 2020.

POLICE AUTHORITY BOARD

1. **Constitution**
   A non-ward committee consisting of:
   - 11 Members elected by the Court of Common Council including:
     - a minimum of one Member who has fewer than five years' service on the Court at the time of his/her appointment; and,
     - a minimum of two Members whose primary residence is in the City of London;
   - 2 external members (i.e. non-Members of the Court of Common Council) appointed in accordance with the terms of the Police Authority Board Membership Scheme

2. **Quorum**
   The quorum consists of any five Members.

3. **Membership 2019/20**

   18 (4) Simon D'Olier Duckworth, O.B.E., D.L.

   4 (4) Christopher Michael Hayward

   18 (4) Ian David Luder, J.P., Alderman

   5 (3) Nicholas Michael Bensted-Smith, J.P.

   4 (3) Keith David Forbes Bottomley, Deputy

   11 (3) Alison Jane Gowman, Alderman

   2 (2) Tijs Broeke

   2 (2) Emma Edhem, Alderman

   10 (1) Douglas Barrow

   14 (1) James Henry George Pollard, Deputy

   5 (1) James Michael Douglas Thomson, Deputy

   Together with two non-City of London Corporation Members:-

   Andrew Lentin *(appointed for a four-year term to expire in September 2021)*
   Deborah Oliver *(appointed for a four-year term to expire in September 2022)*

4. **Terms of Reference**
   To be responsible for:-

(a) securing an efficient and effective police service in both the City of London and, where so designated by the Home Office, nationally, and holding the Commissioner to account for the exercise of his/her functions and those persons under his/her direction and control;

(b) agreeing, each year, the objectives in the Policing Plan, which shall have regard to the views of local people, the views of the Commissioner and the Strategic Policing Requirement;

(c) any powers and duties vested in the Court of Common Council as police authority for the City of London by virtue of the City of London Police Act 1839, the Police and Criminal Evidence Act 1984, the Police Acts 1996 (as amended) and 1997, the Criminal Justice and Police Act 2001, the Police Reform Act 2002, the Police Reform and Social Responsibility Act 2011 and any other Act or Acts, Statutory Instruments, Orders in Council, Rules or byelaws etc. from time to time in force, save the appointment of the Commissioner of Police which by virtue of Section 3 of the City of London Police Act 1839 remains the responsibility of the Common Council;

(d) making recommendations to the Court of Common Council regarding the appointment of the Commissioner of the City of London Police;

(e) the handling of complaints and the maintenance of standards across the Force;

(f) monitoring of performance against the City of London Policing Plan;

(g) appointing such committees as are considered necessary for the better performance of its duties.

(h) To appoint the Chairman of the Police Pensions Board.

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POLICE COMMITTEE
Thursday, 4 April 2019

Minutes of the meeting of the Police Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Thursday, 4 April 2019 at 11.00 am

Present

Members:
Douglas Barrow (Chairman)
Deputy James Thomson (Deputy Chairman)
Nicholas Bensted-Smith
Deputy Keith Bottomley
Tijs Broeke
Alderman Emma Edhem
Alderman Ian Luder
Andrew Lentin (External Member)
Deputy Henry Pollard

Officers:

John Barradell	-	Town Clerk & Chief Executive of the City of London Police Authority
Simon Latham	-	Head of Town Clerk's Office & Deputy Chief Executive of the City of London Police Authority
Oliver Bolton	-	Deputy Head of the City of London Police Authority Team
Alistair MacLellan	-	Town Clerk's Department
Chandni Tanna	-	Town Clerk's Department
David Mackintosh	-	Town Clerk's Department
Alistair Cook	-	Chamberlain's Department
Paul Chadha	-	Comptroller & City Solicitor's Department
Paul Wilkinson	-	City Surveyor
Ola Obadara	-	City Surveyor's Department
Warren Back	-	City Surveyor's Department

City of London Police:

Ian Dyson	-	Commissioner of the City of London Police
Alistair Sutherland	-	Assistant Commissioner of the City of London Police
Karen Baxter	-	Commander (Economic Crime)
Jane Gyford	-	Commander (Operations)
Cecilie Booth	-	Chief Operating and Chief Financial Officer
Martin O'Regan	-	Director of Estates and Support Services
Hayley Williams	-	City of London Police

1. **APOLOGIES**
   Apologies were received from Simon Duckworth, Alderman Alison Gowman, Chris Hayward and Deborah Oliver.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
   There were no declarations.

3. **MINUTES**
   RESOLVED, that the public minutes and non-public summary of the meeting held on 28 February 2019 be approved as a correct record.

4. **OUTSTANDING REFERENCES**
   Members considered a joint report of the Commissioner and Town Clerk regarding outstanding references since the last meeting and the following points were made.

   3/2018/P – Annual Review of Fees and Charges

   - The Commissioner noted that the deadline for delivery of this item of work would take place in Autumn 2019 given that, in consultation with the Treasurer, the Commissioner had agreed to undertake a more strategic review of the Force's Charging Model.

   15/2018/P – Barbican CCTV

   - In response to a comment from the Commissioner that the delivery of this reference had been affected by the delay in opening of Crossrail, Members agreed that the deadline for the reference should be within six months of the rescheduled opening date for Crossrail.

   RESOLVED, that the report be received.

5. **MINUTES - PROFESSIONAL STANDARDS AND INTEGRITY SUB (POLICE) COMMITTEE - 15 MARCH 2019**
   RESOLVED, that the draft public minutes and non-public summary of the Professional Standards and Integrity Sub (Police) Committee meeting held on 15 March 2019 be received.

6. **RESPONSE TO DOMESTIC ABUSE (REFERENCE 16/2018/P)**
   Members considered a report of the Commissioner regarding a response to Outstanding Reference 16/2018/P (Domestic Abuse) and the following points were made.

   - In response to a question, the Commander (Operations) clarified that any instance of domestic abuse reported to the Force in the City would be dealt with by the Force in the first instance, then referred to the victim's home Force for resolution.

RESOLVED, that the report be received and Outstanding Reference 16/2018/P be closed.

7. **SECURE CITY PROGRAMME - UPDATE AND ROAD MAP FOR DEVELOPMENT**
   Members considered a joint report of the Commissioner and the Town Clerk regarding the Secure City Programme – Update and Road Map for Development and the following points were made.

   - In response to a question, the Commander (Operations) replied that the scheduled Gateway 1/2 Project Report would be submitted to Members in Quarter 2 rather than Quarter 1.

   RESOLVED, that the report be received.

8. **QUARTERLY COMMUNITY ENGAGEMENT UPDATE**
   Members considered a quarterly update report of the Commissioner regarding Community Engagement and the following points were made.

   - The Commander (Operations) noted that Community Engagement reports would feature mental health statistics and spend going forward.

   - In response to a question, the Commander (Operations) replied that Operation Luscombe would form part of the Force's 'business-as-usual' operations. She added that the statistics provided with future reporting would make the distinction between rough sleepers and beggars, and avoid using the term(s) vagrant and vagrancy.

   - In response to a question, the Commander (Operations) replied that the Force's Cycle Team was undergoing a refresh, and agreed that a focus on improving both cyclist and pedestrian behaviours and awareness could feature in that refresh of activities.

   - In response to a request, the Commander (Operations) agreed that future reporting could make a distinction between the types of vehicle involved in cycling incidents. She confirmed that traffic lights had the force of law for cycle users.

   - In response to a comment, the Commander (Operations) agreed to confirm the cost of rolling out the Mental Health Street Triage (MHST) approach 24 hours a day, seven days a week.

   RESOLVED, that the report be received.

9. **QUARTERLY EQUALITY AND INCLUSION UPDATE**
   Members considered a quarterly update report of the Commissioner regarding equality and inclusion and the following points were made.

   - In response to a question, the Commissioner agreed to provide Members with the advert for Community Scrutiny Group members.

RESOLVED, that the report be received.

10. **DRAFT SAFER CITY PARTNERSHIP STRATEGY 2019-22**
Members considered a report of the Town Clerk regarding the draft Safer City Partnership Strategy 2019-2022 and the following points were made.

- The Town Clerk noted that any comments made by Members that day would be incorporated into the final iteration of the strategy that would be submitted to the Safer City Partnership meeting in May 2019.

- In response to a comment, the Town Clerk agreed to include motoring offences including driving under the influence of drugs/alcohol to the list of anti-social behaviours covered by the strategy.

- A Member noted that officers should be mindful of any potential synergies between Secure City and Safer City.

- In response to a comment, the Town Clerk agreed to include 2018/19 data in the strategy, and to provide Members with the final iteration once it had been drafted.

RESOLVED, that the report be received.

11. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions.

12. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
Commander Jane Gyford
The Chairman congratulated Commander Gyford on her recent promotion to Deputy Chief Constable of Cambridgeshire Police.

Sgt Anne Meddlycott
The Chairman congratulation Sgt Meddlycott on her recent promotion to Inspector at the City of London Police.

13. **EXCLUSION OF THE PUBLIC**
RESOLVED, that under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

14. **NON-PUBLIC MINUTES**
RESOLVED, that the non-public minutes of the meeting held on 28 February 2019 be approved as a correct record.

15. **NON-PUBLIC OUTSTANDING REFERENCES**
Members considered a report of the Town Clerk regarding non-public outstanding references.

16. **NON-PUBLIC MINUTES - POLICE ACCOMMODATION WORKING PARTY - 28 FEBRUARY 2019**
    RESOLVED, that the non-public minutes of the Police Accommodation Working Party meeting held on 28 February 2019 be received.

17. **NON-PUBLIC MINUTES - PROFESSIONAL STANDARDS AND INTEGRITY SUB (POLICE) COMMITTEE - 15 MARCH 2019.**
    RESOLVED, that the draft non-public minutes of the Professional Standards and Intergirty Sub (Police) Committee held on 28 February 2019 be received.

18. **COMMISSIONER'S UPDATES**
    The Commissioner was heard regarding a number of updates.

19. **CITY OF LONDON POLICE - BREXIT UPDATE**
    Members considered an update report of the Commissioner regarding Brexit.

20. **CITY OF LONDON POLICE RESOURCE BID TO ADDRESS THREAT AND DEMAND**
    Members considered a report of the Commissioner regarding a City of London Police Resource Bid to address Threat and Demand.

21. **PARTNERSHIP FUNDING STRATEGY**
    The Town Clerk noted that this report had been withdrawn.

    At this point of the meeting, two hours having elapsed, Members agreed to extend the meeting in line with Standing Order 40 of the Court of Common Council.

22. **CITY OF LONDON POLICE AND RAIL DELIVERY GROUP STAGE 2 CONTRACT AWARD**
    Members considered a report of the Commissioner of Police regarding the City of London Police and Rail Delivery Group Stage 2 Contract Award.

23. **MEMORANDUM OF AGREEMENT BETWEEN THE COMMON COUNCIL OF THE CITY OF LONDON AND THE POLICE ICT COMPANY DEED OF VARIATION**
    Members considered a report of the Commissioner regarding a Memorandum of Agreement between The Common Council of the City of London and The Police ICT Company Deed of Variation.

24. **NATIONAL S22 COLLABORATION AGREEMENT- SINGLE ON LINE HOME - DIGITAL PUBLIC CONTACT PROGRAMME**
    Members considered a report of the Commissioner regarding a S22A Collaboration Agreement – Digital Public Contact Solution.

25. **POLICE ACCOMMODATION STRATEGY: DECANT PROGRAMME - NEW STREET AND BISHOPSGATE REQUEST FOR BUDGET INCREASE**
Members considered a joint report of the City Surveyor, Chamberlain and Commissioner regarding the Police Accommodation Strategy: Decant Programme – New Street and Bishopsgate Request for a Budget Increase.

26. **WOOD STREET AND SNOW HILL POLICE STATIONS - DISPOSAL UPDATE**
Members considered an update report of the City Surveyor regarding Wood Street and Snow Hill Police Stations.

27. **REPORT ON ACTION TAKEN**
Members considered a report of the Town Clerk regarding action taken since the last meeting.

28. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions.

29. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There were no items of urgent business.

The meeting ended at 1.08 pm

Chairman

Contact Officer: Alistair MacLellan / alistair.maclellan@cityoflondon.gov.uk

Reference Number	Meeting Date & Agenda Item	Reference	Responsible Officer	Status
3/2018/P	1 November 2018 Item 6 – Annual Review of Fees and Charges	Report to be submitted to Members setting out instances where fees and charges have not been imposed and the reasons for this. **Update:** In discussion with the Police Authority Treasurer it has been agreed that this is part of a more strategic review of a Charging Model and as such it will be integrated into the strategic financial planning process.	Commissioner of Police	**DUE AUTUMN 2019**
7/2018/P	1 November 2018 Item 9 – Stop and Search Update	Stop and Search Training Reference will remain live until completed in April 2019. **May 2019 Update**- All Priority 1 officers are now trained. There is an ongoing training programme for priority 2 and 3 officers. Any transferees who join the Force are trained according to the role that they have joined the Force to undertake which means they will have S&S training if their role requires it. New recruits receive approx. 3 days of Stop and Search Training as it forms a large part of their Diploma. Unless there is a significant change in procedure or legislation then it is likely that a refresher programme for Priority 1-3 officers would take place in 3-5 years' time.	Commissioner of Police	**COMPLETE**

Reference Number	Meeting Date & Agenda Item	Reference	Responsible Officer	Status
8/2018/P	1 November 2018 Item 9 – Stop and Search Update	CoLP Communication Strategy update to be submitted to April 2019 meeting. To include review of how to improve communications with Members and the public regarding how the Force and partners respond to incidents of rough sleeping in the City in consultation with CoL Corporate Comms team (formerly 4/2019/P).	Town Clerk / Commissioner of Police	**COMPLETE- ON AGENDA**
15/2018/P	Item 4 Outstanding References	Barbican CCTV will form part of Secure City Programme when CCTV is reviewed in the round.	Commissioner of Police	**DUE SIX MONTHS POST-CROSSRAIL OPENING.**
21/2018/P	Item 7 Questions	Review of terms of office for Police Committee Members.	Town Clerk	**COMPLETE – ON AGENDA**
3/2019/P	January 2019 Item 8 Quarterly Community Engagement Update	Review of Operation Luscombe to be submitted to Members. **Update May 2019**- CI Communities updates that this review will be included in the next Quarterly Community Engagement update which is due to the July Committee	Commissioner of Police	**DUE IN QUARTERLY COMMUNITY ENGAGEMENT JULY 2019 UPDATE**
6/2019/P	January 2019 Item 10 Quarterly Equality and Inclusion Update	Report on future of IAG and CSG to be submitted to Members.	Commissioner of Police	**DUE JULY 2019**

Reference Number	Meeting Date & Agenda Item	Reference	Responsible Officer	Status
7/2019/P	Item 11 ATTRO Review 2018	Report on whether ATTRO remains appropriate tool to be submitted to Members.

April 2019 Update: Policy Committee (February 2019) agreed that ATTRO arrangements be subject to review every three years. | Director of the Built Environment | **DUE JANUARY 2020** |
9/2019/P	February 2019 Item 7 Revenue Monitoring to December 2018	Finance Director to refresh budget monitoring template to include commentary on variances, and column between Revised and Actual Budget to enable Members to compare Year-to-Date budget.	Commissioner of Police	**REFRESHED MONITORING TEMPLATE WILL BE REPORTED TO SEPTEMBER 2019 MEETING.**
11/2019/P	February 2019 Item 8 Revenue and Capital Budgets 2019/20	Report on how Commissioner will deliver on operational commitments within proposed budgets for 2019-20 to be submitted to Members. Report to include commentary and context (e.g. breakdown of types of Police staff) for City of London Police Authority stakeholders e.g. Finance Committee. Vacancies to be included in Revenue budgets going forward.	Commissioner of Police	**COMPLETE- ON AGENDA**
13/2019/P	February 2019 Item 13 Questions	Report on Partnerships Funding Strategy to be submitted to Members.	Commissioner of Police	**DUE JULY 2019**
14/2019/P	April 2019 Item 8 Quarterly Community Engagement Update	Statistics for begging and rough sleeping to be separated out and language of reporting to avoid term 'vagrant'/ vagrancy going forward.	Commissioner of Police	**NEXT QUARTERLY UPDATE DUE JULY 2019**

Reference Number	Meeting Date & Agenda Item	Reference	Responsible Officer	Status
16/2019/P	April 2019 Item 8 Quarterly Community Engagement Update	Roads Policing statistics in the next Quarterly update to provide breakdown of type of vehicle involved in incidents.	Commissioner of Police	**NEXT QUARTERLY UPDATE DUE JULY 2019**
17/2019/P	April 2019 Item 8 Quarterly Community Engagement Update	Potential cost of 24/7 provision of Mental Health Street Triage to be provided to Members **May 2019 Update-** A note was circulated to Members on Friday 3rd May with this information	Commissioner of Police	**COMPLETE**
18/2019/P	April 2019 Item 9 Quarterly Equality and Inclusion Update	Community Scrutiny Group advert to be shared with Members **May 2019 Update**- This was sent to the Clerk on 29th April to circulate again to Members as requested.	Commissioner of Police	**COMPLETE**
19/2019/P	April 2019 Item 10 Safer City Partnership Strategy 2019-2022	SCP draft Strategy to be amended to include motoring/driving under influence of drugs; 2018/19 statistics; and revised draft to be shared with Members ahead of May 2019 submission to Safer City Partnership	Town Clerk	**COMPLETE**

2

ECONOMIC CRIME BOARD OF THE POLICE COMMITTEE
Friday, 5 April 2019

Minutes of the meeting of the Economic Crime Board of the Police Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Friday, 5 April 2019 at 11.00 am

Present

Members:
Nicholas Bensted-Smith (Chairman)
Simon Duckworth
Deputy Keith Bottomley
Andrew Lentin (External Member)
Deputy Robert Merrett
Deputy Henry Pollard

City of London Police Authority:
Simon Latham – Deputy Chief Executive
Oliver Bolton – Deputy Head of Police Authority Team
Alistair MacLellan – Town Clerk's Department
Dr Lucy Fraser – Town Clerk's Department

City of London Police Force:
Karen Baxter – Commander (Economic Crime)
Pete O'Doherty – Detective Chief Superintendent
Perry Stokes – A/Detective Chief Superintendent

1. **APOLOGIES**
   Apologies were received from Doug Barrow, Ben Murphy and Deputy James Thomson.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
   There were no declarations.

3. **MINUTES**
   RESOLVED, that the public minute and non-public summary of the meeting held on 21 January 2019 be approved as a correct record.

4. **OUTSTANDING REFERENCES**
   Members considered a joint report of the Town Clerk and the Commissioner regarding outstanding references and the following points were made.

   1/2017/P – Fraudulent Cryptocurrencies / City of London Police Website

   - The Town Clerk noted that Action Fraud could be better sign-posted on the City of London Police website.

2/2017/P – Cyber Training for Members

- The Town Clerk noted that Member briefing sessions had been convened for 15 May, 29 May, 19 June and 1 July.

4/2018/P – Action Fraud and Customer Experience

- The Commander (Economic Crime) noted that Members would receive a presentation at their next meeting.

6/2019/P – National Lead Force Performance / Webchat Numbers

- The Commander (Economic Crime) noted that IBM had provided a roadmap towards resolution of the issue causing a drop in webchat numbers (obscure chat icon on screen) but that resolution of this issue had a lower priority than other areas for resolution on the new website. The reference would therefore remain live.

7/2019/P – National Lead Force Performance / Reporting and Monitoring Model

- The Commander (Economic Crime) noted that the Force had worked hard for the past six-nine months to raise the profile of fraud, and that a refresh of the reporting and monitoring model formed part of that effort. A refreshed reporting and monitoring model would improve any bids for funding.

8/2019/P – National Lead Force Performance / Communications

- The Commander (Economic Crime) noted that the Force's communications approach employed a variety of channels including Facebook and LinkedIn.

13/2019/P – Brexit / Engagement with short-term office space providers

- The Commander (Economic Crime) noted that she was comfortable with the preparations undertaken by the Economic Crime Directorate to date in response to Brexit.

RESOLVED, that the report be received.

5. **NATIONAL LEAD FORCE PERFORMANCE FOR THE 11 MONTHS TO 28 FEB 2019**
   Members considered a report of the Commissioner regarding National Lead Force Performance for the 11 months to 28 February 2019 and the following points were made.

Pursue

- In response to a question, the Commander (Economic Crime) noted that a judicial outcome was a term that applied to a variety of types of outcome including the issuing of a summons or a ticket, or a case where the Crown Prosecution Service decided not to pursue the case further.

- In response to a question, the Commander (Economic Crime) noted that the trend of rising crime was not unique to fraud, which is why it was important for fraud to be recognised as a critical area within the criminal justice landscape. In achieving that recognition, it was imperative for the Force to develop a focused, intelligence-led response.

- The Commander (Economic Crime) noted that it was a positive step for the Force to be included in relevant Home Office decision-making Boards.

- The Chairman noted that the October 2018 spike in crime reports recorded in the National Dissemination Table was a legacy issue due to old data being disseminated to local Forces.

- In response to a question, the Commander (Economic Crime) noted that the breakdown between dissemination and crime reporting was complicated by the fact that outcomes were often reported in a different year to when the crime was first reported. This meant it was important to develop an approach that would allow quicker dissemination. This would be supported by Home Office funding to link Force IT systems with local Forces across the UK.

- In response to a question, the Commander (Economic Crime) noted that new data would be available from June 2019, but that Members should be mindful of the accompanying cultural shift in how this data was reported and disseminated.

- In response to a request, the Commander (Economic Crime) agreed to liaise with Andrew Lentin outside of the meeting regarding early drafts of tiered data, and for the new data to feature as an agenda item at the next meeting **(14/2019/P).**

- In response to a comment, the Commander (Economic Crime) noted that the reduction in disseminations from 2016 onwards despite rising crime was reflective of demand outstripping capacity, but nevertheless outcomes remained positive. The Town Clerk noted that outcomes did include the decision to take no further action on a case.

Prepare

- Members agreed that customer surveys should be refreshed now that the Force had adopted a new performance framework **(15/2019/P).**

- In response to a question, the Commander (Economic Crime) replied that three types of Specials were utilised by the Economic Crime Directorate – City professionals, cyber experts, and Economic Crime Academy experts. The Commander noted that City professionals were difficult to secure for long-term investigations as they commonly took months and years to conclude. Members commented that the use of Specials could be reviewed to ensure they were utilised to best effect **(16/2019/P).**

RESOLVED, that the report be received.

6. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**
There were no questions.

7. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
There was no other business.

8. **EXCLUSION OF THE PUBLIC**
RESOLVED, that under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Act.

9. **NON-PUBLIC MINUTES**
RESOLVED, that the non-public minutes of the meeting held on 21 January 2019 be approved as a correct record.

10. **NON-PUBLIC OUTSTANDING REFERENCES**
Members considered a joint report of the Commissioner and the Town Clerk regarding non-public outstanding references.

11. **ECONOMIC CRIME ACADEMY UPDATE**
Members considered an update report of the Commissioner regarding the Economic Crime Academy.

12. **ECONOMIC CRIME VICTIM CARE UNIT PERFORMANCE TO FEBRUARY 2019**
Members considered a report of the Commissioner regarding Economic Crime Victim Care Unit Performance to February 2019.

13. **ECONOMIC CRIME DIRECTORATE STAFF NUMBERS AT 28 FEBRUARY 2019**
Members considered a report of the Commissioner regarding Economic Crime Directorate Staff Numbers as at 28 February 2019.

14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**
There were no non-public questions.

15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE BOARD AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There were three items of other business.

15.1 **Performance Framework 2019/20**
Members considered a report of the Commissioner regarding the Performance Framework 2019/20.

The meeting ended at 12.30 pm

Chairman

Contact Officer: Alistair MacLellan / alistair.maclellan**@cityoflondon.gov.uk**

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Committee(s): Police Authority Board	Date(s): 16 May 2019
Subject: Appointment of Committees 2019/20, Appointments to Other Bodies, Term Limits and City of London Police Authority Mapping Exercise	Public
Report of: Town Clerk	For Decision
Report author: Alistair MacLellan	

Summary

This report invites Members to appoint Committees of the Police Authority Board for 2019/20 alongside appointments to other bodies. The report also deals with a number of governance references arising from past meetings including the introduction of term limits for Police Authority Board Members, and Board oversight of Police Authority business seen by other City of London Corporation Committees, Sub-Committees and Boards.

Recommendation(s)

Members are asked to:

- Review and confirm whether the current schedule of meetings of the Police Authority Board per year remains appropriate.

- Review and approve the terms of reference, composition and frequency of meetings of the Board's Committees and Working Parties at Appendix 1.

- Approve the recommendations regarding appointments to Committees and Working Parties set out within paragraph 4.

- Approve appointments to other bodies set out within paragraph 5.

- Review and confirm whether maximum consecutive term limits for Police Authority Board Members should be adopted.

- Review the mapping exercise regarding Police Authority business considered at other City of London Corporation Committees at Appendix 2.

Main Report

Current Position

1. The Police Authority Board was appointed for 2019/20 by the Court of Common Council at its meeting on 26 April 2019. At this, the Board's first meeting since its appointment, it is necessary to appoint various Committees and, if required,

Working Parties for the ensuing year to enable the Board to better carry out its role of scrutinising the City of London Police Force.

Proposals

2. **Frequency of Meetings.** The Police Authority Board currently meets eight times a year (approximately January, March, April, May, July, September, November and December) with forthcoming meetings on 11 July 2019, 19 September 2019, 24 October 2019, and 28 November 2019. Members are asked to consider whether this tempo of meetings remains appropriate.

3. **Appointment of Committees and Working Parties.** Members are asked to review Appendix 1 and scrutinise, propose amendments to, and ultimately approve the terms of reference, composition, membership and frequency of meetings of the bodies described below.

4. Members are asked to note that the designation of the Police Committee as the Police Authority Board, the nomenclature for the former Police Committee's *Sub-Committees* will be changed to *Committee of the Police Authority Board* to reflect common governance practice.

   a. **Economic Crime Committee**

      i. To appoint five Members from the Police Authority Board to the Economic Crime Committee.

      ii. To agree that the co-option of two co-opted Members to the Economic Crime Committee be delegated to that Committee. N.B. those co-opted persons could represent outside bodies including the Home Office.

      iii. To appoint the Chairman of the Economic Crime Committee 2019/20.

   b. **Performance and Resource Management Committee**

      i. To appoint five Members from the Police Authority Board to the Performance and Resource Management Committee.

      ii. To note that two co-opted Members will be appointed by the City's Audit and Risk Management Committee.

      iii. To agree that the co-option of one Member of the Performance and Resource Management Committee be delegated to that Committee.

      iv. To appoint the Chairman of the Performance and Resource Management Committee.

c. **Professional Standards and Integrity Committee**

    i. To appoint five Members from the Police Authority Board to the Professional Standards and Integrity Committee.

    ii. To agree that the co-option of two Common Councillors and one external co-opted Member to the Professional Standards and Integrity Committee be delegated to that Committee.

    iii. To appoint the Chairman of the Professional Standards and Integrity Committee.

d. **Police Pensions Committee**

    i. To appoint the Chairman of the Police Pensions Committee.

e. **Police Accommodation Working Party.** This working party is composed of both Members of the Police Authority Board, and officers of the Force and Authority with remit over the delivery of the Police Accommodation Programme. Members are asked to either,

    i. Agree the appointment of the Working Party for 2019/20 in line with Appendix 1, or

    ii. Designate the Working Party a Committee of the Police Authority Board with delegated powers to make representations to the Capital Buildings Committee on the Police Authority Board's behalf. This would require that the composition of the Committee be restricted to Police Authority Board Members only. The frequency of meetings of the Police Accommodation Committee would be adjusted to be aligned with the reporting cycle for the City's Capital Buildings Committee. This approach would streamline the current reporting process which involves reports being submitted to the Police Accommodation Working Party, on to the Police Authority Board, and any resolutions arising being submitted to the Capital Buildings Committee.

f. **Medium-Term Financial Plan Working Party.** This Working Party was established in January 2019 and has had one formal meeting. Members are asked to consider whether this Working Party should be re-established for 2019/20 and, if so,

    i. Consider any necessary adjustments to the Working Party's terms of reference.

    ii. Appoint three Police Authority Board Members to the Medium-Term Financial Plan Working Party.

5. **Appointments to other Bodies.** Members are asked to consider the following appointments for 2019/20.

a. **Streets and Walkways Sub (Planning and Transportation) Committee** – One Member. Previously Alderman Alison Gowman.

b. **Digital Services Sub (Finance) Committee** – One Member. Previously Deputy Keith Bottomley.

c. **Homelessness and Rough Sleeping Sub (Community and Children's Services) Committee** – Two Members. Previously Tijs Broeke and Alderman Ian Luder.

d. **Safer City Partnership** – One Member. Previously Doug Barrow.

e. Note the appointment of Chairman and Deputy Chairman of Police Authority Board (or their nominees) to the **Capital Buildings Committee**.

f. Note appointment of Chairman and Deputy Chairman (or their representatives) to the **Crime and Disorder Scrutiny Committee**.

g. **Association of Police and Crime Commissioners** – One Member. Previously Simon Duckworth OBE DL.

Terms Limits for Police Authority Board Members

6. Outstanding Reference 21/2018/P arising from the Police Committee meeting on 5 December 2018 was that consideration be given to instituting term limits for Police Authority Board Members.

7. Other Committees of the City of London Police Authority (the Court of Common Council) that employ term limits are as follows:

    a. **Barbican Centre Board**. Maximum continuous service limit of three terms of three years e.g. nine years.

    b. **Board of Governors of the Guildhall School of Music and Drama.** Terms of three years renewable twice - maximum service limit of nine years.

    c. **Standards Committee.** Maximum service of eight years.

    d. **Audit and Risk Management Committee.** Maximum continuous period of service (except when Chairman or Deputy Chairman) of nine years in any 12-year period.

8. Term limits are commonly introduced to encourage consistent and orderly turnover of Board Members, periodically refresh the skills available to a wider Board, and prevent a Board from becoming overly reliant on specific individuals.

9. Members will receive a verbal update at their 16 May 2019 meeting regarding term limits employed by other UK Police Authorities.

10. Should Members wish to ensure a skills-based approach to appointment of Police Authority Members, the Town Clerk could institute steps such as an annual skills audit of Board Members, and the appointment of a Nominations Committee to consider applications from potential External Co-Opted Members. Any identified skills gaps could be advertised to the Court of Common Council when elections to the Police Authority Board are conducted and taken into account during the co-option of external Members to the Board.

11. Members are invited to consider whether they believe it is necessary to institute maximum term limits for Police Authority Board Members.

City of London Police Authority Bodies with remit over Police Authority Matters

12. One action arising from the January 2019 report to the Police Committee regarding City of London Police Authority Governance (see *Background Papers*) was a mapping exercise of all City of London Police Authority (Court of Common Council) Committees and Sub-Committees that had remit over, or occasional oversight of, Police Authority business. The outcome of this mapping exercise is the grid included at Appendix 2.

13. This mapping exercise is designed to clarify which bodies of the City of London Police Authority consider Police Authority matters from time to time and will enable the Town Clerk to ensure Police Authority business is clearly demarcated on agendas where appropriate.

14. Another reference arising from the January 2019 governance report was to ensure that the Police Authority Board receive all reports covering Police Authority matters seen by other Committees. As demonstrated at Appendix 2, the level of business seen by other Committees is varied and diverse, and therefore the Town Clerk will keep this reference under review and proposes that a summary report of Police Authority business considered at other Committees be provided to each Police Authority Board meeting. This approach is designed to ensure that Police Authority Board agendas remain as concise as possible to enable the Board to focus on strategic matters. Members are invited to comment on this approach.

Appendices

- Appendix 1 – Police Authority Board Committee(s) Terms of References and Compositions

- Appendix 2 – Summary of City of London Police Authority Bodies with remit over Police Authority Matters

Background Papers

City of London Police Authority – Governance – Report of the Town Clerk to the Police Committee (24 January 2019) and Policy and Resources Committee (21 February 2019)

Alistair MacLellan
Town Clerk's Department

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Economic Crime Committee (formerly Economic Crime Board)

Composition

- The Chairman and Deputy Chairman of the Police Authority Board (ex-officio).
- Up to five Members of the Police Authority Board appointed by the Police Authority Board.
- Up to two co-opted Members to be appointed by the Police Authority Board.

Terms of Reference

To be responsible for:

> a. *Overseeing the force's national responsibilities for economic crime and fraud having regard to the strategic policing requirement in this area;*
>
> b. *monitoring government, and other external agencies' policies and actions relating to economic crime; and,*
>
> c. *Making recommendations to the Police Authority Board in matters relating to economic crime.*

Membership 2018/19

Nick Bensted-Smith (Chairman)
Simon Duckworth OBE DL
Doug Barrow (Ex-Officio)
Deputy Keith Bottomley
Andrew Lentin (Co-Opted)
Deputy Robert Merrett
Ben Murphy (Co-Opted)
Deputy Henry Pollard
Deputy James Thomson (Ex-Officio)

Frequency of Meetings
Quarterly

Performance and Resource Management Committee (formerly Sub-Committee)

Composition

- The Chairman and Deputy Chairman of the Police Authority Board (ex-officio);
- Up to five Members of the Police Authority Board appointed by the Police Authority Board;
- Two co-opted Members to be appointed by the Audit and Risk Management Committee; and
- Up to one more co-opted Member to be appointed by the Police Authority Board.

Terms of Reference

To be responsible for:

a. *overseeing the monitoring of performance against the City of London Policing Plan;*

b. *overseeing the Force's resource management in order to maximise the efficient and effective use of resources to deliver its strategic priorities;*

c. *making recommendations to the Police Authority Board to change procedures, where necessary, to bring about improvements in performance;*

d. *monitoring government, policing bodies and other external agencies' policies and actions relating to police performance and advising the Police Authority Board or Commissioner as appropriate; and*

e. *any other matter referred to it by the Police Authority Board.*

Membership 2018/19

Deputy James Thomson (Chairman)
Doug Barrow (Ex-Officio)
Nick Bensted-Smith
Deputy Keith Bottomley
Tijs Broeke
Andrew Lentin (Co-Opted)
Kenneth Ludlam (Audit and Risk Management Committee Co-Opted Member)
Caroline Mawhood (Audit and Risk Management Committee Co-Opted Member)

Frequency of Meetings
Quarterly

Professional Standards and Integrity Committee (formerly Sub-Committee)

Composition

- The Chairman and Deputy Chairman of the Police Authority Board (ex-officio)
- Up to five Members of the Police Authority Board appointed by the Police Authority Board
- Up to two co-opted Common Council Members to be appointed by the Police Authority Board
- One external co-opted Member to be appointed by the Police Authority Board.

Terms of Reference

To be responsible for:

a. *overseeing the handling of complaints and the maintenance of standards across the force, where necessary recommending changes in procedures and performance to the Police Authority Board;*

b. *monitoring the Police Authority Board's work in respect of conduct and appeals proceedings; and,*

c. *monitoring government, police authorities and other external agencies' policies and actions relating to professional standards and advising the Police Authority Board or Commissioner as appropriate.*

d. *overseeing the work of the City of London Police Integrity Standards Board, whose purpose is to direct and co-ordinate the auditing of the key indicators in relation to the City of London Police Integrity Dashboard, delivery of associated action plans and promoting the understanding of the Police Code of Ethics.*

Membership 2018/19

Alderman Alison Gowman (Chairman)
Doug Barrow (Ex-Officio)
Nick Bensted-Smith
Tijs Broeke
Mia Campbell (External Co-Opted Member)
Deborah Oliver
Deputy Richard Regan OBE (Co-Opted Common Councillor)
Deputy James Thomson (Ex-Officio)
James Tumbridge (Co-Opted Common Councillor)

Frequency of Meetings
Quarterly

Police Pensions Committee (formerly Board)

Composition

- Three Scheme Manager Representatives
- Three Scheme Member Representatives

1. The Chairman of the Sub-Committee is appointed by the Police Authority Board. The Chairman of the Police Pensions Board then appoints the Committee.

Terms of Reference

In line with the requirements of the Public Services Pensions Act 2013 and the Police Pensions Regulations 2015 for the management of the City of London Police's Pension Scheme, to be responsible for assisting the Scheme Manager (the City of London Police) in the following matters:

    a)   Securing compliance with the scheme regulations and other legislation relating to the governance and administration of the scheme and any statutory pension scheme that it is connected to;

    b)   Securing compliance with requirements imposed in relation to the scheme and any connected scheme by the Pensions Regulator; and

    c)   Other such matters as the scheme regulations may specify.

Membership 2018/19

Alderman Ian Luder (Chairman)
John Todd (Deputy Chairman)
Alex Barr
Philip Hodgson
Helen Isaac
Tim Parsons

Frequency of Meetings
Three times per year

Police Accommodation Working Party

Composition

    a. Chairman and Deputy Chairman of the Police Authority Board;
    b. Police Committee Members who are also Members of the Capital Buildings Committee;
    c. Commissioner of the City of London Police;
    d. City Surveyor;
    e. Chamberlain (or nominated deputy);
    f. Town Clerk (or nominated deputy);
    g. Police Accommodation Programme Director (City of London Police);
    h. Director of Estates and Support Services (City of London Police)

Terms of Reference

To be responsible for:

    a. Reviewing the requirements proposed by the Force for the new police station;

    b. Reviewing the requirements proposed by the Force for the different strands of the decant;

    c. Challenging the requirements to ensure that they are sufficient to meet the current and future needs of the Force, while representing value for money; and

    d. Defining the Force requirements for sign-off by the Police Authority Board prior to submission to the Capital Buildings Committee.

    e. Ensuring that the Capital Buildings Committee is fully informed of the dependencies and that these are reflected in the overall accommodation programme.

    f. Ensuring that the disposal strategy does not compromise operational requirements and that contingencies are appropriately considered.

Membership 2018/19

Doug Barrow
Deputy James Thomson
Deputy Keith Bottomley
Chris Hayward
Alderman Alison Gowman
Alderman Ian Luder
Commissioner of the City of London Police
City Surveyor
Chamberlain

Town Clerk
Director of Estates and Support Services, City of London Police
Assistant Director of Estates and Support Services, City of London Police

Frequency of Meetings
The working party is proposed to meet initially on a monthly basis before moving to bimonthly as agreed appropriate by its members (*N.B. in practice this Working Party has met every six weeks).*

Medium Term Financial Plan Working Party

Composition

- Chairman of Police Authority Board
- Deputy Chairman of Police Authority Board
- Three Members of the Police Authority Board

Terms of Reference

- To provide additional Member scrutiny of the Medium-Term Financial Projections which will inform the Medium-Term Financial Plan;

- To review further relevant information regarding City of London Police Force requirements ahead of the January 2019 Resource Allocation Sub (Policy and Resources) Committee.

Membership 2018/19

- Doug Barrow (Chairman)
- Deputy James Thomson (Deputy Chairman)
- Andrew Lentin
- Nick Bensted-Smith
- Tijs Broeke

Frequency of Meetings
As required.

Reference Number	Body	Remit	Appointments to/from Police Authority Board	Police Authority Business explicitly referenced in Terms of Reference
1	Court of Common Council	The City of London Police Authority, which vests its powers and duties in the Police Authority Board except for the appointment of Commissioner of Police.	Appoints 11 Common Councillors and 2 external Members to the Police Authority Board	Yes
2	Police Authority Board	Has vested in it the powers and duties of the Court of Common Council as Police Authority for the City of London by virtue of the City of London Police Act 1839, together with other relevant legislation, save the appointment of Commissioner of Police	11 Common Councillors and 2 external Members appointed by the City of London Police Authority (Court of Common Council)	Yes
3	Economic Crime Board	The 'sub-committee' of Police Authority Board responsible for scrutinising the Force's response to Economic Crime	Chairman and Deputy Chairman of the Police Authority Board, up to five Members of the Police Authority Board, and up to two co-opted Members	Yes
4	Performance and Resource Management (PRM) Sub (Police Authority Board) Committee	Responsible for scrutinising PRM of the Force against the Policing plan.	Chairman and Deputy Chairman of Police Authority Board, up to five Members of the Police Authority Board, and one co-opted Member. PRM Sub co-opts two Members from Audit and Risk Management Committee	Yes
5	Professional Standards and Integrity Sub (Police Authority Board) Committee	Responsible for scrutinising professional standards in the Force	Police Authority Board appoints Chairman and Deputy Chairman, up to five Members of Police Authority Board, up to two co-opted Common Councillors, and one external Co-Opted Member	Yes
6	Police Pensions Board	The 'sub-committee' of Police Authority Board responsible for scrutinising pension arrangements	Police Authority Board appoints Chairman who in turn appoints scheme manager representatives and scheme member representatives	Yes
7	Police Accommodation Working Party	A working party of Police Authority Board responsible for determining Police Accommodation needs	Police Authority Board appoints Chairman and Deputy Chairman, any Police Authority Board Members who are Members of Capital Buildings Committee, plus a number of Authority and Force officers	Yes
8	Medium-Term Financial Plan Working Party	A working party of Police Authority Board responsible for providing additional Member scrutiny of the Medium-Term Financial projections that will inform Medium-Term Financial Plan	Police Authority Board appoints Chairman and Deputy Chairman plus three Members	Yes
9	Policy and Resources Committee	Responsible for matters of policy and strategic importance to the City of London Corporation, and the City of London Corporation's security and emergency planning.	Police Chairman is ex-officio Member	No
10	Resource Allocation Sub (Policy and Resources) Committee	Sub-Committee of Policy responsible for reviewing strategic funding issues relating to City of London Police	No	No
11	Projects Sub (Policy and Resources) Committee	Sub-Committee of Policy responsible for reviewing non-strategic City of London Police projects	No	No
12	Capital Buildings Committee	Committee responsible for overseeing strategic City of London Police projects	Chairman and Deputy Chairmen of Police (or their nominees) serve whilst Police Major Projects are 'live'	No
13	Finance Committee	Responsible for obtaining value for money in the City of London Police	No	Yes
14	Efficiency and Performance (E&P) Sub (Finance) Committee	Scrutinises E&P of City of London Police	No	Yes
15	Digital Services Sub (Finance) Committee	Oversees IT strategy for City of London Police Authority and City of London Police	Police Authority Board appoints one Member	Yes
16	Procurement Sub (Finance) Committee	Projects Sub has started referring Police projects to Procurement Sub for review.	No	Yes
17	Audit and Risk Management Committee	Conducts audit of Police Authority / Force	ARM Committee provides two co-optees to Police Performance and Resource Management Sub	No
18	Licensing Committee	Responsible for licensing functions including action to prohibit consumption of alcohol in line with Criminal Justice and Police Act 2001 and Local Authorities (Alcohol Consumption in Public Places) Regulations 2001 and charity collections under the Police, Factories and Miscellaneous Provisions Act 1916.	No	Yes
19	Planning and Transportation Committee	Committee has considered Police powers e.g. ATTRO	No	No
20	Streets and Walkways Sub (Planning and Transportation) Committee	Responsible for traffic engineering and management, and all matters relating to road safety.	Police Authority Board appoints one Member	No
21	Homelessness and Rough Sleeping Sub (Community and Children's Services) Committee	Responsible for considering strategies and proposals to alleviate rough sleeping and homelessness in the City of London.	Police Authority Board appoints two Members	No
22	Safeguarding Sub (Community and Children's Services) Committee	Police had remit over human trafficking, prostitution and sometimes when children are taken into care.	No	No
23	Safer City Partnership	Aim to reduce level of crime, disorder, anti-social behaviour and substance misuse in City of London	Police Authority Board appoints one Member	Yes
24	Crime and Disorder Scrutiny Committee	To review and scrutinise decisions made or actions taken in connection with discharge by responsible authorities and other members of the Safer City Partnership	Chairman and Deputy Chairmen of Police Authority Board (or their reps) are Members	Yes
25	Culture, Heritage and Libraries Committee	Responsible for City of London Police Museum	No	No
26	Establishment Committee	Responsible for non-uniformed City of London Police Staff	No	Yes
27	Health & Wellbeing Board	Responsible for carrying out all duties conferred by Health and Social Care Act 2012	Commissioner appoints a rep of the City of London Police to serve on the Board	No

Board(s):	Date(s):
Police Authority Board	16th May 2019
Subject: Draft Annual Report 2018-19	**Public**
Report of: Commissioner of Police Pol 38-19	**For Decision**
Report author: Teresa La Thangue, Communications Director	

Summary

The draft Annual Report, representing the achievements of the City of London Police for the past financial year, is submitted to the Board for approval. The report contains information on crime, financial and staff statistics, as well as a summary of performance and highlights within the year.

It is requested that any comments on and/or changes to the report be sent via the Town Clerk's Department to the Force's Communications Director by Monday 10 June 2019.

Recommendation

It is recommended that the contents of the draft Annual Report be approved, and that any comments upon the report be forwarded as indicated above.

Main Report

Background

1. The Annual Report serves as the vehicle for the Commissioner of Police to reflect upon what has been achieved in the past financial year and to report on crime, resources and financial statistics. It will be officially published during Summer after it has been presented to the Court of Common Council.

Current Position

2. The style and content of the annual report was reviewed in 2017, driven by a number of factors, the most significant of these was cost.

3. Since 2017 the annual report has been online. This year, again the report has been designed to available solely online, and can be accessed via this link.

4. The online edition has been constructed in such a way as to be accessible via both desktop and mobile devices. A hard copy of the content has not been produced this year.

5. The decision to produce a purely online edition was reached due to a diminishing demand for a printed copy of the report, while readership of the online edition has grown. In 2016, the last time the annual report was designed for hard copy the number of printed copies of the annual report was significantly reduced, going from the 500 copies in 2015 to 180. Of these 180, 120 were provided to the Corporation of London and CoLP Communications department retained 60.

6. The 2017/2018 edition of annual report received close to 2000 online visits since it was published, an increase of over 800 visits on the previous year.

7. This year's report has been produced in-house at no cost.

8. As in previous years, the 2018/2019 financial data will be uploaded before the report is presented to the Court of Common Council.

9. It is notable that most police forces do not publish an annual report in this format anymore, although PCCs are obliged to produce such a document.

10. As you will see, this report is in-keeping with the approach adopted last year and is significantly shorter than previous years. The report takes a high-level overview of what was achieved against the previous year's priorities an in doing so, it is hoped the report replicates how the force is dedicating resource towards the force priorities. This slimmed down and high-level approach is also in keeping with the HMICFRS request that our communications illustrate 'you said – we did'.

Conclusion

11. The Annual Report is a corporate document which provides a high-level record of the Force's achievements in the preceding year in an easily accessible and engaging format.

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Committee(s):	Date(s):
Police Authority Board	16th May 2019
Subject: HMICFRS Integrated PEEL Assessment 2018-19	**Public**
Report of: Commissioner of Police Pol 41-19	**For Information**
Report author: Stuart Phoenix, Head of Strategic Development	

Summary

In May 2019, Her Majesties Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) published its report on the integrated PEEL (Police Efficiency, Effectiveness, Legitimacy) Assessment.

This is a high level summary which presents the report to the May Police Authority Board as requested by the Chairman.

The Force was assessed overall as follows:
Effectiveness   GOOD
Efficiency   GOOD
Legitimacy   REQUIRES IMPROVEMENT

A fuller report with proposed actions to address the areas for improvement will be submitted to the Police Performance and Resource Management Sub Committee at its June 2019 meeting as part of the regular HMICFRS Update.

Recommendation

Members are asked to

1) Note the report

2) Note that a fuller detailed report regarding areas for improvement and planned action will be submitted to the Police Performance and Resource Management Sub Committee in June 2019 as part of the HMICFRS update.

Main Report

Background

1. In 2018/19, HMICFRS adopted an integrated PEEL assessment (IPA) approach to its existing PEEL (police effectiveness, efficiency and legitimacy) inspections. IPA combines into a single inspection the effectiveness, efficiency and legitimacy areas of PEEL. These areas had previously been inspected separately each year.

2. As well as HMICFRS inspection findings, their assessment is informed by their analysis of:
   • force data and management statements;
   • risks to the public;
   • progress since previous inspections;
   • findings from our non-PEEL inspections;
   • how forces tackle serious and organised crime locally and regionally; and
   • our regular monitoring work.

   HMICFRS inspected all forces in four areas:
   • protecting vulnerable people;
   • firearms capability;
   • planning for the future; and
   • ethical and lawful workforce behaviour.

Current Position

3. The Force has been assessed as follows:

Effectiveness	**Overall: Good**	**Last inspected**
Preventing crime and tackling anti-social behaviour	Good	2017/18
Investigating crime	Good	2018/19
Protecting vulnerable people	Good	2018/19
Tackling serious and organised crime	Good	2018/19
Armed policing	Ungraded	2018/19

Efficiency	**Overall: Good**	**Last inspected**
Meeting current demands and using resources	Good	2017/18

Planning for the future	Requires improvement	2018/19
Legitimacy	**Overall: Requires improvement**	**Last inspected**
Fair treatment of the public	Requires improvement	2018/19
Ethical and lawful workforce behaviour	Requires improvement	2018/19
Fair treatment of the workforce	Good	2017/18

4. HMIC Matt Parr commented that HMIC are satisfied by most aspects of City of London Police's performance. But the Force needs to make improvements in its legitimacy to provide a consistently good service.

5. The Force is good at preventing and investigating crime. It works effectively with partners to identify and protect vulnerable people. The Force understands demand well. But further work is needed to address the budget gap over the rest of the medium-term financial plan and the Force's workforce plans need to be completed. The Force continues to uphold an ethical culture and promote standards of professional behaviour well. But the Force has more to do to assure itself that it has the capacity and capability to root out corruption. Also, the Force should make sure it has the necessary systems in place to reassure the public that it carries out stop and searches legitimately. HMIC are encouraged by the progress that City of London Police has made.

Conclusion

6. The Force is encouraged by this assessment but will continue to work on the identified areas for improvement. A detailed update will be submitted to the Performance and Resource Management Sub Committee at its June 2019 meeting as part of the regular HMICFRS update.

Appendices

- Appendix 1 – City of London Police HMICFRS Integrated PEEL Assessment Report 2018-19

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HMICFRS

Her Majesty's Inspectorate of Constabulary
and Fire & Rescue Services

PEEL

Police effectiveness, efficiency and legitimacy 2018/19

An inspection of City of London Police

Contents

i

What this report contains

This report is structured in four parts:

1. Our overall assessment of the force's 2018/19 performance.
2. Our judgments and summaries of how effectively, efficiently and legitimately the force keeps people safe and reduces crime.
3. Our judgments and any areas for improvement and causes of concern for each component of our inspection.
4. Our detailed findings for each component.

Our inspection approach

In 2018/19, we adopted an integrated PEEL assessment (IPA) approach to our existing PEEL (police effectiveness, efficiency and legitimacy) inspections. IPA combines into a single inspection the effectiveness, efficiency and legitimacy areas of PEEL. These areas had previously been inspected separately each year.

As well as our inspection findings, our assessment is informed by our analysis of:

- force data and management statements;
- risks to the public;
- progress since previous inspections;
- findings from our non-PEEL inspections;
- how forces tackle serious and organised crime locally and regionally; and
- our regular monitoring work.

We inspected all forces in four areas:

- protecting vulnerable people;
- firearms capability;
- planning for the future; and
- ethical and lawful workforce behaviour.

We consider the risk to the public in these areas important enough to inspect all forces every year.

We extended the risk-based approach that we used in our 2017 effectiveness inspection to the efficiency and legitimacy parts of our IPA inspections. This means that in 2018/19 we didn't inspect all forces against all areas. The table below shows the areas we inspected City of London Police against.

| IPA area	Inspected in 2018/19?
Preventing crime and anti-social behaviour	No
Investigating crime	Yes
Protecting vulnerable people	Yes
Tackling serious and organised crime	Yes
Firearms capability	Yes
Meeting current demands	No
Planning for the future	Yes
Treating the public fairly	Yes
Ethical and lawful workforce behaviour	Yes
Treating the workforce fairly	No

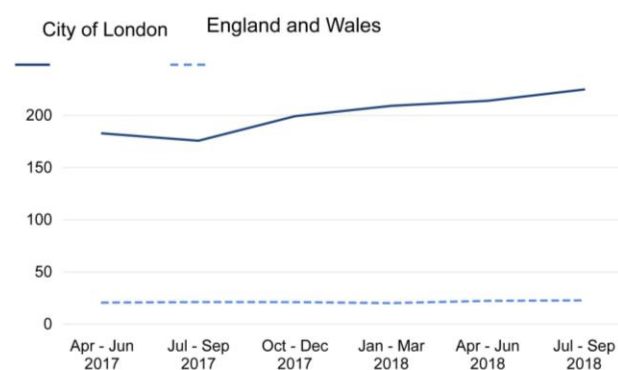Our 2017 judgments are still in place for the areas we didn't inspect in 2018/19.

Force in context

999 calls per 1,000 population
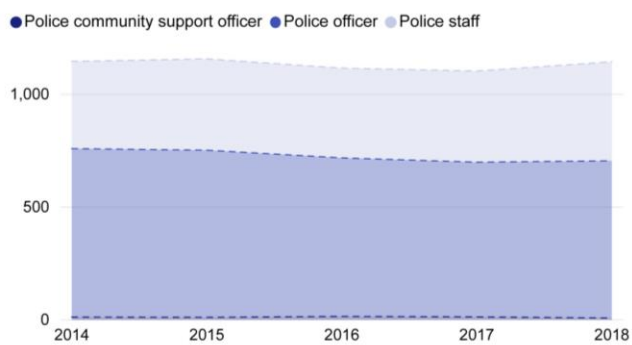
1 April 2017 to 30 September 2018

City of London   England and Wales
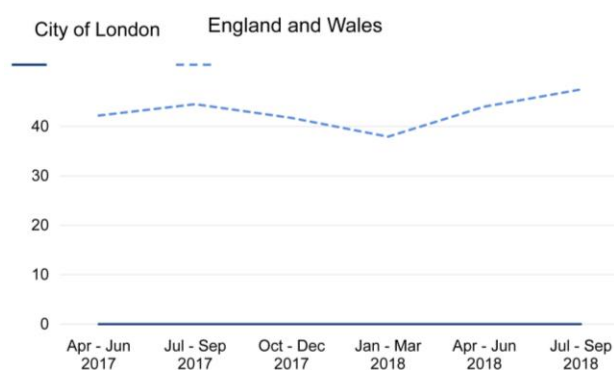
Recorded crime per 1,000 population

1 April 2017 to 30 September 2018

City of London   England and Wales

City of London workforce

in post on 31 March, 2014 to 2018

● Police community support officer ● Police officer ● Police staff

3

Overall summary

				Last inspected
⚙ **Effectiveness**	●●●○ **Good**			**Last inspected**
Preventing crime and tackling anti-social behaviour	●●●○ Good			2017/18
Investigating crime	●●●○ Good			2018/19
Protecting vulnerable people	●●●○ Good			2018/19
Tackling serious and organised crime	●●●○ Good			2018/19
Armed policing	Ungraded			2018/19

				Last inspected
£ **Efficiency**	●●●○ **Good**			**Last inspected**
Meeting current demands and using resources	●●●○ Good			2017/18
Planning for the future	●●○○ Requires improvement			2018/19

	Legitimacy	●●○○ **Requires improvement**	**Last inspected**
	Fair treatment of the public	●●○○ Requires improvement	2018/19
	Ethical and lawful workforce behaviour	●●○○ Requires improvement	2018/19
	Fair treatment of the workforce	●●●○ Good	2017/18

HM Inspector's observations

I am satisfied by most aspects of City of London Police's performance. But the force needs to make improvements in its legitimacy to provide a consistently good service.

The force is good at preventing and investigating crime. It works effectively with partners to identify and protect vulnerable people.

The force understands demand well. But further work is needed to address the budget gap over the rest of the medium-term financial plan and the force's workforce plans need to be completed.

The force continues to uphold an ethical culture and promote standards of professional behaviour well. But the force has more to do to assure itself that it has the capacity and capability to root out corruption.

Also, the force should make sure it has the necessary systems in place to reassure the public that it carries out stop and searches legitimately.

I am encouraged by the progress that City of London Police has made. I look forward to a more consistent performance over the coming year.

Matt Parr

HM Inspector of Constabulary

Effectiveness

Force in context

	City of London	England and Wales
Proportion of officers in a neighbourhood or response function in post on 31 March 2018	17%	39%

Victim-based crime

12 months ending 30 September 2018

City of London

Other crimes against society 14%

Criminal damage and arson 4%

Violence against the person 17%

Theft offences 62%

Sexual offences 3%

Criminal damage and arson 11%

Other crimes against society 14%

Theft offences 39%

England and Wales

Violence against the person 30%
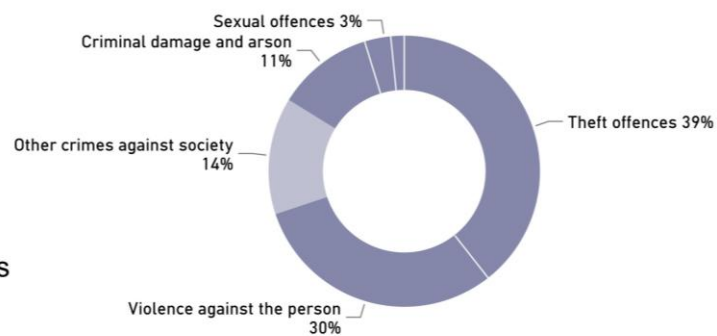
Proportion of crimes where action was taken

12 months ending 30 September 2018

City of London   England and Wales

Violence against the person
Theft offences
Sexual offences
Robbery
Other crimes against society
Criminal damage and arson

0%   20%   40%   60%   80%
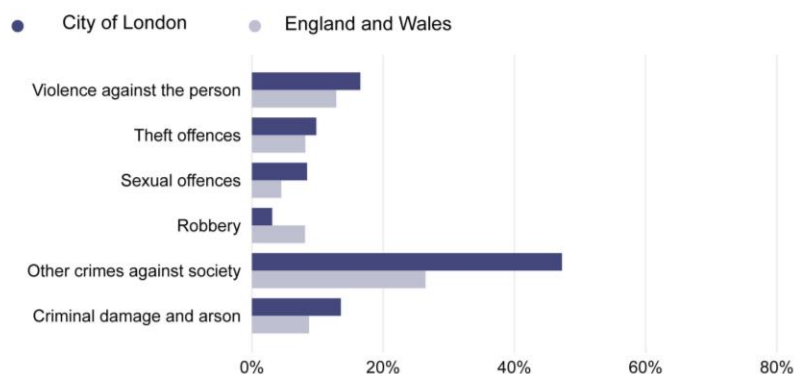
Proportion of crimes where suspect was identified

12 months ending 30 September 2018

City of London   England and Wales

Violence against the person
Theft offences
Sexual offences
Robbery
Other crimes against society
Criminal damage and arson

0%   20%   40%   60%   80%
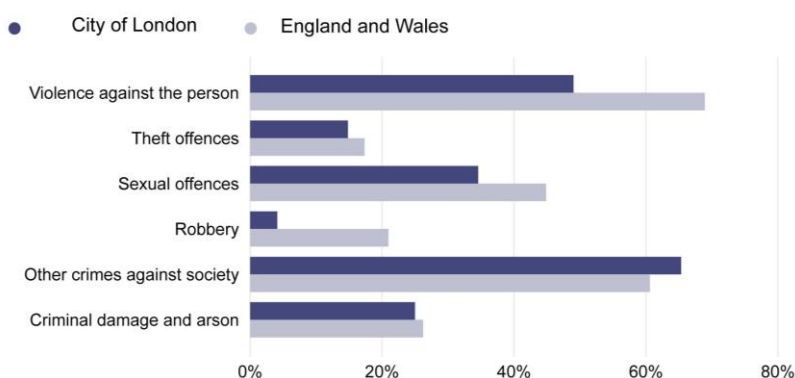
Proportion of crimes where victim did not support police action

12 months ending 30 September 2018

City of London   England and Wales

Violence against the person
Sexual offences
Robbery
Criminal damage and arson
Other crimes against society
Theft offences

0%   20%   40%   60%   80%

9

Page 49
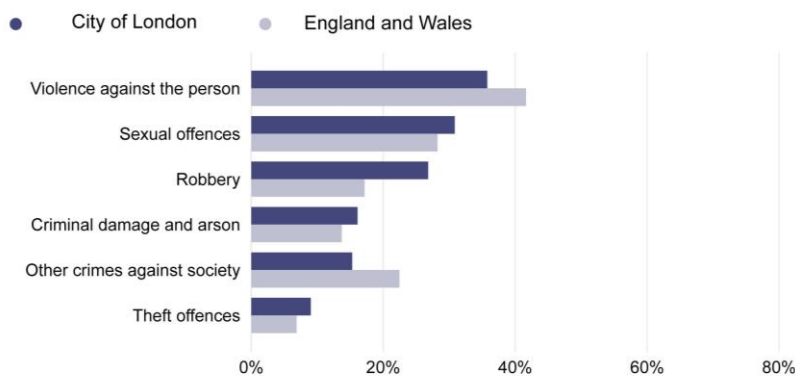
How effectively does the force reduce crime and keep people safe?

Good

Summary

The force is good at preventing crime and tackling anti-social behaviour. This judgment has been carried over from our last inspection in 2017/18.

The force is also good at investigating crime. Its economic crime victim care unit provides excellent support. However, its victim satisfaction rate has fallen this year as officers have less time to spend with victims.

The force has a comprehensive understanding of vulnerability in its area. A specialist nurse supports officers in dealing with incidents related to mental health.

The force's handling of domestic abuse has improved during the last year. However, it still needs to improve how it shares information with schools about children who may have witnessed domestic abuse.

In relation to tackling serious and organised crime, the force does some particularly good work on fraud and cyber-enabled crime.

However, it needs to improve its understanding of other forms of serious and organised crime, particularly drug dealing and county lines.

Preventing crime and tackling anti-social behaviour

Good

This question was not subject to detailed inspection in 2018/19, and our judgment from the 2017 effectiveness inspection has been carried over.

Investigating crime

●●●○

Good

The force is good at investigating crime. It has enough detectives to meet its demand as it has recently transferred in a number of detectives from other forces. They are all trained to a high standard. Its economic crime victim care unit provides excellent support.

However, it needs to improve the way it uses its crime recording and management system to manage its case files and investigative processes better. It is still not using a new system consistently, and as a result is making mistakes. It has taken almost a year to put old records onto the new system.

Also, its victim satisfaction rate has fallen this year for those who are not victims of economic crime or vulnerable victims. Officers have less time to spend with victims than they used to.

But the force is good at catching criminals. Since 2016, the force has almost halved its number of 'wanted' persons.

Area for improvement

- The force should improve its use of its crime-recording and management system to better manage its case files and investigative processes.

We set out our detailed findings below. These are the basis for our judgment of the force's performance in this area.

Investigation quality

City of London Police investigates crime well. The force splits its investigative functions into three components: economic crime investigation, other crime investigation, and information and intelligence. Crime investigations are always allocated to appropriately trained officers and staff. The force has recently transferred in a number of detectives from other forces, and now has enough to meet its demand. Detectives have completed all national training requirements for their roles, and they are offered a broad range of continuing professional development, such as working on complex crimes from other forces.

Because the force area is small, officers can attend each crime scene and gather evidence early. Trained forensic staff and detectives are always on call. Our review of crime files found that in 48 out of 60 cases there had been an effective investigation, and 59 out of 60 cases had been investigated by the most appropriate team. Our interviews with officers and further testing of case files found supervision and investigations to be of a high standard.

But the force needs to improve the way it uses its system for managing case files and investigation processes. A new system was introduced in late 2017 and the force is

still not using it consistently. We found mistakes in the way the force had allocated some crimes and recorded supervision and victim contact. Despite this, we found a good level of supervision, particularly in the public protection unit.

An economic crime victim care unit provides excellent support to vulnerable victims especially those who have reported a crime that was not investigated further, either due to a lack of evidence or a very low probability of catching those responsible. The victim care unit has extended this support to vulnerable victims from two other forces, in Greater Manchester and the West Midlands, and there are plans to extend the service to other forces this year.

Victims who do not fall into either of two categories (i.e. they are not victims of economic crime or vulnerable victims) reported lower levels of satisfaction with the service in 2018 than they did the year before. Officers told us this is partly due to the force disbanding the team that supports victims after a suspect has been charged. The officers who conduct the investigation now support victims and keep them updated. Officers also told us that because of increased workloads they can spend less time with victims than they used to. As part of its transformation project, the force should look for ways to address the decline in victim satisfaction.

Among all the forces in England and Wales, City of London Police has the lowest percentage of cases against known suspects discontinued because the witness does not support a prosecution. The average rate across England and Wales is 15.52 percent, whereas for City of London Police it is 5.21 percent. But while this is positive, the picture is not so good in cases where a suspect has not been identified and the victim doesn't support a prosecution. At 9.09 percent, the force has one of the highest rates for ending an investigation compared with an England and Wales rate of 4.61 percent.

Catching criminals

Since 2016, the force has almost halved its number of 'wanted' persons, from 246 to 126. Supervisors regularly brief officers about wanted persons, and work closely with the public protection unit to find them.

Between 1 April 2017 and 31 March 2018, 502 suspects were released under investigation. Officers monitor them regularly. However, it has taken almost a year to put old records onto the new system. The force routinely works with the Home Office immigration enforcement team, as there are a large number of building sites and cafes in the City of London where people have been found to be working illegally.

The disclosure process in criminal prosecutions is crucial in ensuring a fair trial, and City of London Police is collaborating with the other London forces to make sure officers and staff fulfil their disclosure obligations. Police investigations must follow all reasonable lines of enquiry, including those that point away from the suspect. Prosecutors must provide the defence with any material that undermines the case for the prosecution or assists the case for the defence.

The force is part of a pan-London group of police forces and other criminal justice bodies that has been set up to deal with the disclosure problems seen in London and elsewhere in England and Wales. City of London Police now has 'disclosure champions' who review cases and offer advice and guidance to officers. All officers

and staff attend a one-day disclosure training session and officers complete an online training course. Officers from the economic crime department attend a higher-level disclosure course, which is important in complex financial investigations.

Protecting vulnerable people

Good

The force has a comprehensive understanding of vulnerability in its area, including hidden vulnerability – for example, modern slavery on building sites and sex workers in pop-up brothels. It safeguards vulnerable victims to a high standard.

Call handlers assess callers for vulnerability. Even though the command and control system does not automatically identify repeat callers, officers and staff manually check other systems for signs of vulnerability. It gives them good advice about staying safe and preserving evidence. Domestic abuse risk assessments we reviewed were found to be of a high quality.

The force responds well to incidents that involve someone with mental health problems. It works well with other agencies to assess and respond to these incidents. A specialist nurse supports officers in dealing with incidents related to mental health.

The force's handling of domestic abuse has improved during the last year. However, it still needs to improve how it shares information with schools regarding children who may have witnessed domestic abuse. It also needs a more effective system for collecting feedback from vulnerable victims.

Areas for improvement
- The force should implement a process to get feedback from vulnerable victims.
- The force should implement the necessary processes to share information with schools in relation to children affected by domestic abuse incidents, to ensure information is shared as quickly and effectively as possible.

We set out our detailed findings below. These are the basis for our judgment of the force's performance in this area.

Understanding and identifying vulnerability

Protecting vulnerable people is one of City of London Police's top priorities. The force has a clear definition of vulnerability and has plans in place to support vulnerable people. It works with the City of London Corporation, local health services and charities to make sure vulnerable people receive the services they need.

The force has a comprehensive understanding of the nature and scale of vulnerability in its area. Officers look out for hidden forms of vulnerability, for example modern slavery on building sites and cafes and sex workers in pop-up brothels. The force has commissioned research on hidden vulnerability and briefs its officers about what to

look for. It has also assessed future demand relating to people with mental health issues and missing people and is planning accordingly.

Call handlers identify vulnerable victims promptly. Most calls for the force are taken by the Metropolitan Police Service, and the reports are sent to the City of London Police control room. Although the force's command and control system does not automatically identify repeat callers, officers and staff manually check other systems for vulnerability. An intelligence officer is always present in the control room to look for vulnerability and risk in the open call logs, and to provide officers attending incidents with extra information. This helps officers and staff make good decisions about threat and risk.

The force attends all calls for service from the public, which is almost unheard of in other forces. It had no backlog of calls or incidents awaiting a police response when we visited the control room during our inspection. We saw call handlers giving victims good advice about staying safe and preserving evidence, and they can request expert advice easily through an on-call system in the control room.

Responding to incidents

Officers usually respond to incidents involving vulnerable victims quickly enough to keep them safe. The force covers a small area, and it has recently increased the number of officers with cycle training, because this is the fastest way to reach victims in busy traffic.

When officers arrive at a domestic abuse scene, they mostly do a thorough job of assessing the victim's vulnerability, and also recognise the risks relating to other people in the household. We reviewed a small number of domestic abuse risk assessments and found them to be of a high quality. The force has a thorough, three-stage review process for domestic abuse risk assessments, which means it is unlikely to miss vulnerable victims. The assessments are checked by the first-line supervisor, by the duty inspector and then again by the public protection unit supervisor to make sure they include appropriate safeguarding actions and further support.

Officers from the public protection unit and the duty inspector share information about immediate safeguarding with other agencies such as health, social care and housing. These agencies told us the force shares information in a timely and efficient way.

As the force covers a busy central London area with many vulnerable people on the streets, a high proportion of the incidents it attends involve mental health concerns. It works well with other agencies to assess and respond to these incidents. A mental health nurse is deployed with the police response vehicles between 7.00pm and 3.00am each night to help deal with any cases involving mental health. The nurse can decide whether somebody needs assessment, and can access medical records and secure facilities more quickly than a police officer. The force has monitored this practice over six months to assess its effectiveness and has now given it stable funding.

Response officers use arrest and voluntary attendance, in which suspects can attend a police station at an appointed time, in line with the rest of England and Wales forces. Its use of arrest is 87.18 percent compared with the England and Wales arrest rate of

90.51 percent, and its use of voluntary attendance is 12.82 percent compared with the England and Wales rate of 9.49 percent. The force is also in line with the rest of England and Wales forces for its domestic abuse charge rate, which is 14 percent.

Supporting vulnerable victims

City of London Police safeguards vulnerable victims to a high standard. The public protection unit is responsible for safeguarding victims of domestic abuse, supported by neighbourhood officers, while the communities team safeguards victims with mental health issues. The force has an independent vulnerable victims advocate who advises officers about necessary safeguarding measures. Neighbourhood and communities teams visit vulnerable victims regularly, giving them protective advice and helping them make their properties more secure.

Last year, one of the areas for improvement we identified in City of London Police was that the force should share information with schools about children who may have witnessed domestic abuse. Work has commenced to put in place the necessary processes but is not completed yet, which means children may not receive the support they need in school after witnessing a traumatic incident. It therefore remains an area for improvement.

During 2018, the force has much improved its use of legal powers to protect victims of domestic abuse. It has trained officers in how to authorise applications for domestic violence protection orders and complete the applications. Due to the relatively small resident population in the City of London, most domestic abuse cases involve victims who live outside the force area but are within the City of London when the abuse takes place. In these cases, the force has good processes in place to make sure it carries out the initial safeguarding of victims and efficiently transfers cases to other forces.

As it is a relatively small force, City of London Police does not have a multi-agency safeguarding hub. However, its public protection unit provides the same functions, and all high-risk domestic abuse cases are referred into the multi-agency risk assessment conference.

Last year, we found that the force needed to improve how it collected feedback from vulnerable victims. This year we found that the vulnerable victims advocate collects feedback from domestic abuse victims, and attempts to collect feedback from victims with mental health concerns, but these forms are rarely returned. We did not find evidence of feedback being collected from other vulnerable victims and so this too remains an area for improvement for the force.

The force is good at sharing with other bodies the lessons it learns about its work with vulnerable people. It reviews most incidents involving vulnerable victims and shares this information with other agencies through the force's learning forum and the City of London Corporation, which acts as the local authority for the force.

The force manages a small number of offenders who pose a risk to vulnerable victims, and it does this well. It carries out risk assessments for offenders and reviews them regularly. Most of the registered sex offenders in the City of London are rough sleepers, and the force uses its briefing page to make neighbourhood teams and response officers aware of them. Registered sex offenders are monitored by the public

protection unit, which carries out regular checks to make sure that they are still in the force area and registering as they should. The force has applied for a small number of sexual harm prevention orders this year to protect victims from dangerous or sex offenders.

Tackling serious and organised crime

● ● ● ○

Good

The force does some particularly good work to combat fraud and cyber-enabled crime. One recent investigation into Bitcoin fraud was identified as best practice that is being shared with other forces. Neighbourhood officers look for signs of modern-day slavery and organised criminals such as those who use aggressive begging tactics. The force is good at publicising successful campaigns and raising awareness about fraud and cyber-enabled crime.

However, it should improve the way it approaches its 'lifetime management' of organised criminals to reduce the risk to local communities. Also, it needs to improve its understanding of other forms of serious and organised crime, particularly drug dealing and county lines. It should take a regional approach to tackling these problems. A new drugs reduction strategy focuses on a co-ordinated response to county lines-related drug dealing with its partner organisations.

The force records disruptions of organised crime groups using the national scale, but it has the lowest number of disruptions per group of all England and Wales forces. This is probably because cases are complex economic crimes so are not straightforward to solve.

Areas for improvement

- The force should improve its approach to the 'lifetime management' of organised criminals to minimise the risk they pose to local communities. This approach should include routine consideration of ancillary orders, the powers of other organisations and other tools to deter organised criminals from continuing to offend.
- The force should strengthen its response to county lines, which are criminal networks involved in the distribution of drugs to different areas of the country that frequently exploit children and vulnerable people.

We set out our detailed findings below. These are the basis for our judgment of the force's performance in this area.

Understanding threats

The force has a good understanding of serious and organised crime threats, particularly those involving fraud and cyber-enabled crime. It receives detailed information about fraud, money laundering and cyber-enabled crime from banks, businesses and the National Crime Agency, among others, which helps it to assess the threats.[1]

It has identified other organisations that it wants to work with on this issue over the next year, from both the public and private sectors. It maps all new organised crime groups promptly and rescores them consistently and appropriately using national systems. Processes are in place to monitor or escalate the activities of organised crime groups that have been disrupted by the force or have been inactive for a time. The force has archived a large number of organised crime groups and transferred responsibility for others to different forces over the past two years. This has significantly reduced the number of organised crime groups it is responsible for and means that the force can focus more effort on those that it retains.

We found good practice in frontline policing. Neighbourhood officers look for signs of modern-day slavery, and for organised criminals who use aggressive begging tactics or who pretend to be police officers in order to steal. The force also works well with other regional organised crime units. Most recently, it collaborated with the northwest unit on tackling organised criminals from Manchester who were having an impact on the City of London.

However, the force needs to improve its understanding of other organised crimes, particularly drug dealing and county lines. The force's drugs reduction strategy contains detailed information about the threat from drugs and sets out how the force intends to tackle county lines, but this was not yet in place. It is working with the other London forces on specific issues such as children found at train stations, who are being exploited or are vulnerable to exploitation by county lines drug dealers in the force area.

Last year, we found that the force needed to understand county lines better, and it has made some progress in this, including good work with young people at Liverpool Street station. But more needs to be done. The force told us that it did not have the same problems with county lines gangs as other forces, due to its size and location. Local partners also told us that they had not yet come across any people involved in county lines activities.

We found that a small number of officers did not understand county lines activities and were not aware of the signs they should look for. The force should make sure all its frontline officers and staff understand county lines better.

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[1] City of London Police is the national lead force for economic crime, which includes responsibility for Action Fraud and the National Fraud Intelligence Bureau. In 2018, we inspected the national police response to fraud. In 2019, we published our report of this inspection, called *Fraud: Time to choose*.

Serious and organised crime prevention

The force tries to identify individuals at risk of being drawn into organised crime. It has a small residential population of approximately 9,000 people and has identified crimes that people in the area may be drawn into, such as boiler room frauds,[2] drug or money trafficking or sex work. People can be referred to an early help group if there are concerns about them financially or socially, including if they are at risk of being drawn into organised crime.

The force told us that there were no gangs resident in the force area, and that most gang members who frequent the City live in neighbouring boroughs and across London. This means the force hasn't used any gang injunctions to prevent youth violence. It does, however, use dispersal orders when it receives intelligence about large numbers of youths meeting in the area if it believes this could lead to violence.

Last year, we found that the force needed to improve its approach to preventing serious and organised criminals from offending. Since then it has carried out detailed analysis of this concern, and at the time of our inspection was recruiting staff to manage a new approach. However, it does not yet have an effective approach to lifetime offender management. It does some work with prisons and probation services to actively manage organised criminals, but this is usually relating to fraud and cyber-enabled crime. It does not currently do this for other crimes, such as drug dealing and violence, but it should. This management could include using additional orders, such as compensation, disqualification or forfeiture, other agency powers and other methods to deter organised criminals from continuing to offend.

The force is taking positive steps to increase its prison intelligence capacity and capability, with a number of new officers trained to work in this environment. This has already had a positive impact by helping the force to combat crime involving online vouchers and gift cards.

In relation to serious crime prevention orders, the force works effectively with its other agencies such as HM Revenue & Customs and organisations in the banking sector to enforce these orders. The force is also good at using other techniques to disrupt organised crime. It recently identified a large number of bogus websites through proactive intelligence work with its partner agencies and took the websites offline.

The force is good at publicising successful campaigns and raising awareness about fraud and cyber-enabled crime. It produces alerts describing criminal methods and how to combat them, based on information from its economic intelligence teams. It also sends out protective advice to other forces, private and public sector organisations, and communities. Our 2018/19 thematic inspection of the police response to fraud looked more extensively at this aspect of City of London Police's work. We published our detailed findings in our report *Fraud: Time to Choose*.

There are only six schools in the force area, and officers visit each one to talk to children about the dangers of organised crime, among other topics such as online

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[2] A boiler room fraud is where a bogus stockbroker, usually based overseas, cold-calls investors and coerces someone into buying worthless shares. Their favourite targets are middle-aged people with previous experience of buying shares, whose names are on share registers.

grooming and road safety. This demonstrates the force's commitment to improving the national response to organised fraud and cyber-enabled crime. We found much less evidence of awareness-raising in its wider community about other types of serious and organised crime, such as drug trafficking, organised theft and pickpocketing, however. The force should review its awareness campaigns to make sure that they are covering all the necessary areas.

Disruption and investigation

The force maintains a [serious and organised crime local profile](#), which is used by the City of London Corporation to plan activity by the police and other services. It has an active partnership board structure in place with local partners and the City of London Corporation. It has agreed three priorities for the coming year:

- fraud and cyber-enabled crime;
- modern slavery and domestic servitude; and
- illicit drugs.

The board is supportive and helps the force to focus on these priorities. Its response to fraud and cyber-enabled crime is already good, and it is proactive in its approach to tackling modern slavery. A new drugs reduction strategy, mentioned above, focuses on a co-ordinated response to county lines-related drug dealing with its partners. We will assess the effectiveness of this strategy over the next 12 months.

In a good example of joint working, the force has recently trained all its [lead responsible officers](#), along with officers from the British Transport Police, in how to deal with organised crime groups. Lead responsible officers have access to a broad range of specialist advisers to support them, particularly when investigating economic crimes. The force considers a wide range of covert and overt tactics when dismantling organised criminal operations with links to fraud and cyber-enabled crime. It has tackled organised crime successfully this year, working alongside the national fraud task force and the National Crime Agency.

However, the force needs to scrutinise the work of its lead responsible officers more regularly. A new serious and organised crime board appears to be effective at prioritising new organised crime groups. It has the leadership and planning in place to support effective investigations. But the meeting does not require the lead responsible officers to attend. We could not see how or where they would account for their work. The force should also make sure that all its plans have a [4P](#) approach (pursue, prevent, protect and prepare); the plans we assessed were focused on pursuing criminals, with less detail regarding how to 'protect', 'prevent' and 'prepare'.

The force records disruptions of organised crime groups using the national scale, but it has the lowest number of disruptions per group of all England and Wales forces. This is probably due to the fact that the force usually deals with complex economic crimes, for which disruption may be less straightforward than for other types of organised crime.

Neighbourhood teams have successfully contributed to operations aimed at tackling organised crime groups. This includes one recent case of a Romanian organised crime group involved in aggressive begging. Officers are briefed on the signs they

need to look for and are taking steps to identify organised criminals who operate in the force area.

Last year we said the force needed a better understanding of the impact that it had on serious and organised crime over the medium and long term. We found some improvement in this area this year. The force is measuring its impact more accurately, but it still needs to use its partnership board to get better data from its partners and the other London forces. This would help it allocate resources to tackle all types of serious and organised crime.

The force is good at reviewing its serious and organised crime investigations. It analyses them and shares good practice with other forces. Its recent investigation of Bitcoin fraud is likely to become the standard for all forces to investigate such crimes. By the sharing of good practice, the force is contributing to the national response to serious and organised crime.

Armed policing

We have previously inspected how well forces provide armed policing. This formed part of our 2016 and 2017 effectiveness inspections. Subsequent terrorist attacks in the UK and Europe have meant that the police service maintains a focus on armed capability in England and Wales.

It is not just terrorist attacks that place operational demands on armed officers. The threat can include the activity of organised crime groups or armed street gangs and all other crime involving guns. The *Code of Practice on the Police Use of Firearms and Less Lethal Weapons* makes forces responsible for implementing national standards of armed policing. The code stipulates that a chief officer be designated to oversee these standards. This requires the chief officer to set out the firearms threat in an armed policing strategic threat and risk assessment (APSTRA). The chief officer must also set out clear rationales for the number of armed officers (armed capacity) and the level to which they are trained (armed capability).

Understanding the threat and responding to it

City of London Police operates joint arrangements with the Metropolitan Police Service to provide armed policing. This means that the standards of training, armed deployments and command of armed operations between the forces are consistent.

The force has a good understanding of the potential harm facing the public. Its APSTRA conforms to the requirements of the code and the College of Policing guidance. The APSTRA is published annually and is accompanied by a register of risks and other observations. The designated chief officer reviews the register frequently to maintain the right levels of armed capability and capacity.

Last year we identified an area where the assessment of risk could be improved. We recognise that City of London Police works closely with the Metropolitan Police Service and British Transport Police to provide armed policing in the capital. However, a joint APSTRA as a single point of reference for the three forces does not exist. Such an APSTRA would focus on the entire threat in London and leave the three forces in a stronger position to address it. This remains a shortcoming for the

three forces. However, there are plans in place between the forces to begin joint analysis of threats and risk in April 2019.

All armed officers in England and Wales are trained to national standards. There are different standards for each role that armed officers perform. The majority of armed incidents in City of London Police are attended by officers trained to an armed response vehicle standard. However, incidents sometimes occur that require the skills and specialist capabilities of more highly trained officers.

We found City of London Police has good arrangements in place to mobilise specialist officers should their skills be required. On these occasions, agreements are in place for the capabilities to be provided by specialist officers based within the Metropolitan Police Service.

Working with others

It is important that effective joint working arrangements are in place between neighbouring forces. Armed criminals and terrorists have no respect for county boundaries. As a consequence, armed officers must be prepared to deploy flexibly in the knowledge that they can work seamlessly with officers in other forces. It is also important that any one force can call on support from surrounding forces in times of heightened threat.

The arrangements in place between City of London Police, the Metropolitan Police Service and British Transport Police mean that armed officers can deploy quickly and efficiently in the capital.

We also examined how well prepared forces are to respond to threats and risks. Armed officers in City of London Police are trained in tactics that take account of the types of recent terrorist attacks. Also, City of London Police has an important role in designing training exercises with other organisations that simulate these types of attack. We found that these training exercises are reviewed carefully so that learning points are identified and improvements are made for the future.

In addition to debriefing training exercises, we also found that City of London Police reviews the outcomes of all firearms incidents that officers attend. This helps ensure that best practice or areas for improvement are identified. We also found that this knowledge is used to improve training and operational procedures.
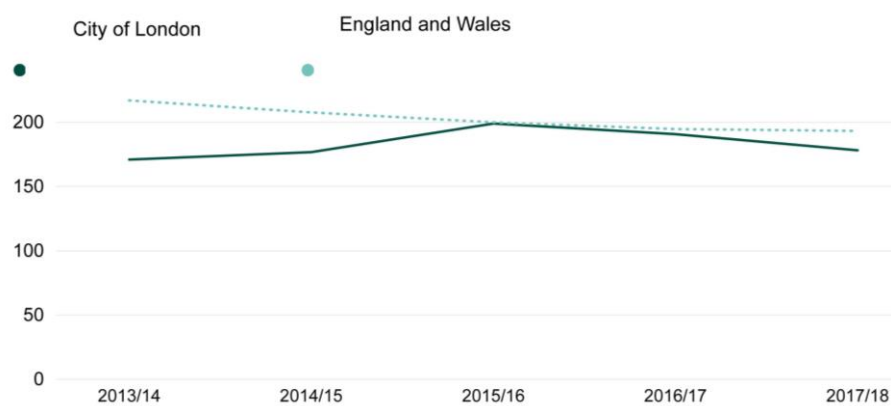
Efficiency

Force in context

Spend per head of population

2013/14 to 2017/18

City of London   England and Wales

200

150

100

50

0

2013/14   2014/15   2015/16   2016/17   2017/18

How efficiently does the force operate and how sustainable are its services?

●●●○

Good

Summary

The force is good at meeting current demand and using its resources. We have carried this judgment over from our last inspection in 2017. However, the force needs to improve how it plans for the future. In particular, it needs to show how it will address the gap in its budget over the next five years.

The force has a good understanding of how demand for its services is likely to change over time.

The force consults the public well. It has a good understanding of what skills it will need for the future and is good at developing its people.

The force works well with a range of other forces and organisations.

The force's plans are ambitious and innovative and should put it in a strong position for the future. But this can only happen once the force achieves a balanced budget.

Meeting current demands and using resources

●●●○

Good

This question was not subject to detailed inspection in 2018/19, and our judgment from the 2017 effectiveness inspection has been carried over.

Planning for the future

Requires improvement

The force needs to improve how it plans for the future. In particular, it needs to show how it will address the deficit in its budget over the next five years.

It has carried out detailed work to evaluate how demand for its services is likely to change over time. It has a long-term plan for how it will address this through a new structure and new ways of working. However, it needs to make sure it can deal with this demand at the same time as addressing the gap in its budget. The force has corrected the mistakes that led to the budget gap, but it still needs to review its plans to address the remaining deficit.

The force consults the public well. It uses its results as a guide to providing services and how it plans its future workforce. It has a good understanding of what skills it will need for the future and is good at developing its people.

The force works well with a range of other forces and organisations. It assesses the benefits of these arrangements as part of its planning.

The force's plans are ambitious and innovative and should put it in a strong position for the future. But this can only happen once the force achieves a balanced budget.

Area for improvement

- The force needs to address the deficit it has identified in its medium-term financial plan.

We set out our detailed findings below. These are the basis for our judgment of the force's performance in this area.

Assessing future demand for services

The force has carried out detailed work to evaluate its future demand. During 2017 external consultants carried out work to assess future demand over the next 5-10 years. It understands there will be an increasing working population with more people travelling through the area, more visitors and an increased number of licensed premises. It has assessed that it will have a 10 percent rise in mental health incidents that it attends, and that cyber-enabled offences will make up over 60 percent of its recorded crime. The force also thinks that artificial intelligence could automate at least 15 percent of its work. Although this assessment provides the force with a strong base to understand its future demand, it must make sure that its demand planning matches the resources it has to address the budget deficit it has identified in its medium-term financial plan.

The force has used the results of a consultant-led demand and value for money review to inform its change plan, known as the 'Transform programme'. This began in January 2018 and is to run over the next two to three years. Its objective is to develop

services against demand and decide which resources will be required in the future. It is intended that a new structure and new ways of working for the force will be agreed by June 2019, with implementation starting in 2020. This is an ambitious plan and considers changes in technology to help it better understand demand, particularly with fraud and cyber-enabled crime. It also considers emerging demand such as the opening of Crossrail which will mean the force needs more resources for the higher numbers of people who will visit the area during the night.

Understanding public expectations

The force has a good understanding of what the public wants and how expectations are changing. It uses this understanding to inform its view of the future and adapts its services appropriately. The force serves a unique community, made up of a small number of residents, a very large number of workers and visitors, and many businesses including banking institutions and commercial enterprises. The force has good links with businesses, residents and workers and it uses well-established meetings to find out what the public wants. The force introduced a new survey process in 2018 that includes both online and street surveys. This doubled the number of people consulted, compared with last year. The force is using this to improve its understanding of public expectations and inform its priorities.

The force uses this understanding of changing public expectations to inform its future plans for recruitment and workforce planning. It recognises that specialist skills to combat fraud and cyber-enabled crime will be required in the future. It is using innovative ways to bring these skills into the force with the use of specialists funded by industry. We think this is good practice and shows the force understands the things that its communities want.

Prioritising

The force has set out a clear vision for the future. Its priorities and plans are informed by its understanding of future demand and changing public expectations. Its Transform programme will involve a period of continuous development that will match resources to demand to meet the priorities it has set out in its policing plan. The force has a comprehensive understanding of its workforce requirements and skills gaps. It is focused on maintaining frontline operational resources and undertakes regular recruitment to ensure that gaps are filled. A recent transferee recruitment campaign brought the detective strength up to establishment.

Future workforce

The force is part way through a very detailed evaluation of its future workforce requirements. It understands the changes in demand it is likely to face and is compiling options as to what the workforce will need to look like to meet that demand. The current workforce strategy is comprehensive and includes leadership development, skills audit, talent management and recruitment plans for its skills gaps. It will also continue to take in officers from other forces.

Based on attrition rates of people leaving and joining, and predicted retirements over the next five years, the force's workforce plan and recruitment strategy aim to recruit 100 probationers and 220 transferees. The force is using its Transform programme to

identify what skills it needs to meet the force's eight strategic objectives (counter terrorism, fraud, cyber-crime, roads policing, public order, anti-social behaviour, vulnerable people, and violent and acquisitive crime). For example, cyber and digital changes mean the workforce will need different skills, requiring officers and staff to increase their technological skills and knowledge. The force sees that, with fewer people choosing a 'career for life' in policing, it needs robust workforce planning processes to ensure continued resilience. The force has staggered its planned recruitment over the next year to meet its savings targets and thereby address its budget shortfall. The force told us this won't change its long-term recruitment plans because these depend on the results of the Transform programme.

The force is ambitious in its plans to increase the size of its special constabulary and to further increase the number of volunteers it has, who bring specialist banking and cyber expertise to the force. The force has made good use of external funding opportunities to fully budget for these plans.

Finance plans

Following its 2010 consultation about revaluing public sector pensions, the government announced, in 2016 and 2018, reductions in the discount rate it uses to set contribution rates for the unfunded public service pension schemes. These include the police service pension scheme. A lower discount rate will result in higher contribution rates for the employer. The official notification of a lower rate in September 2018 did not allow the police committee time to include the impact in their financial planning. In December 2018, the government announced a pension grant for 2019/20. It allocated funding to each force to specifically help the police pay for these increased costs in the next year. The police committee must now plan for how they will finance the increased costs in the following years, assessing the impact on their officer numbers and their ability to provide effective and efficient services.

The revenue medium-term financial plan previously indicated a balanced budget for 2018/19, but with an annual deficit increasing to £5m per annum by 2021/22. However, in late 2018, the force discovered the financial forecasts had been based on incorrect data and flawed assumptions. This included a failure to account for an existing budget gap and the double counting of the national and international city grant. This means the force faced an unbalanced budget for 2018/19 and a more significant deficit over the next five years.

Following further detailed work by the force and the police committee, the budget gap for 2018/19 and 2019/20 has been addressed. The force is using savings it has already made, identified by its Transform programme, and further in-year savings, which include better use of agency workers, staggered recruitment through the year, and the use of additional income from training and support the force provides to other organisations. The police committee holds the reserve for the force and has agreed in principle to find the additional resources to fill the budget gap in the short term. Further work is needed to address the gap over the rest of the medium-term financial plan, which adds up to £12.8m.

Leadership and workforce development

The force is good at developing its workforce and leaders. Its workforce plan is updated every six months to ensure that the force understands its current priorities, demands and threats, mapped against its workforce numbers, skills and demographics. The workforce plan is supported by a five-year recruitment plan, which details the promotion, transferee and other bulk recruitment campaigns to ensure the force meets its demand. There is also a five-year training plan that considers the skills required across the force. All this activity is described in the force's corporate plan.

The force maintains good governance over workforce planning, with structures in place at directorate and force level to scrutinise the filling of existing posts. Talent management schemes are evident and include workplace shadowing and mentoring. The force also has succession plans in place for its senior leadership teams and has used external recruitment successfully over recent years to bring specialisms and experience into the force at senior ranks.

Ambition to improve

The force's plans are ambitious and innovative. The demand and value for money review, the strategic threat and risk assessment process and the Transform programme, plus continued investment in estate and IT, should place the force in a strong position for the future. Resources are in place to achieve change, and the force has achieved savings in the past and continues to identify appropriate areas for efficiencies and investment. But all savings over the foreseeable future will be used to cover the budget shortfall and can't be reinvested in the force. It is too early to make a judgment on the success of the Transform programme. We look forward to assessing this over the next few years.

The force failed to identify flawed planning assumptions in its financial planning during 2017/18. This means the budget gap wasn't recognised until a temporary finance director, who was brought into the force in mid-2018, spent several months reviewing the force's finances. The force and the police committee were told of the shortfall in late 2018 and set up a joint group to review the assumptions made for the 2018/19 budget and for the future years of the financial plan. New measures have been put in place. These include the recruitment of a new finance director who will sit on the management board of the force. Recent work by the force and the police committee to change the structure of the financial management and planning teams appears to be positive. We will assess the impact of these changes over the next year.

The force is part way through its IT transformation programme and has an IT strategy in place to provide it with a reliable, resilient and secure infrastructure. The force recognises that it is currently in deficit with its IT provision. It has an ageing technology infrastructure, some of which is from the last decade. The IT provision is via a managed service with the City of London Corporation. Together, they have plans to provide technology that will improve the force's response to cyber-crime and fraud, and support hot-desking and home working for its staff. The IT renewal phase one, which is underway, is fully funded to £6m. However, the remaining plans, which could total £9m, still require funding to be agreed with the City of London Corporation.

All capital spending plans will need to be reviewed to make sure funding is available for them in light of the revenue budget deficit over the next five years.

The force is involved in a wide range of collaborations, including those with other police forces in the UK and around the world, and public and private organisations, mostly as part of its response to economic crime. In 2017, we said that the force could do more to review the benefits and drawbacks of all its collaborative work and the force has included this as part of its future design planning. The force is now included in the pan-London blue light collaboration programme, which makes the most of its purchasing power.

In 2017, we said that the force should ensure that it understands the level of service that can be provided at different levels of costs. Its annual review of fees and charges 2018/19 has gone some way to identifying the full economic cost per hour of officers and staff, including their available productive hours.
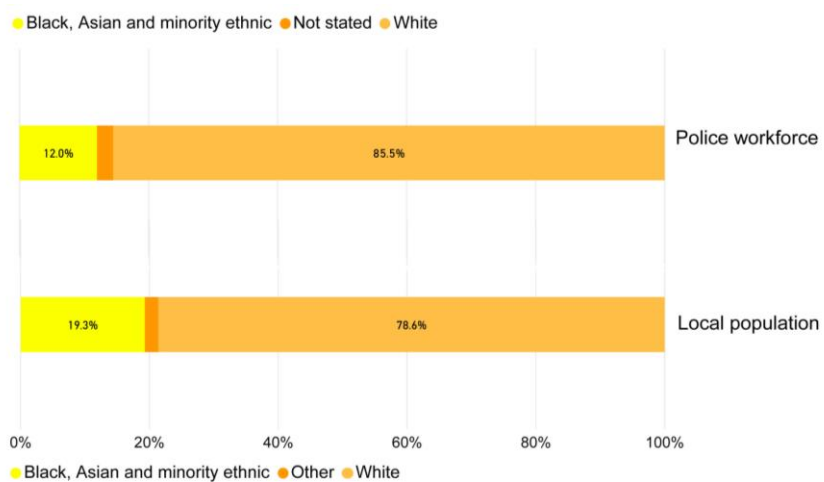
Legitimacy

Force in context

Comparison of City of London workforce ethnicity with local population

as of 31 March 2018

Black, Asian and minority ethnic ● Not stated ● White

Police workforce	12.0% ... 85.5%
Local population	19.3% ... 78.6%

0%   20%   40%   60%   80%   100%

● Black, Asian and minority ethnic ● Other ● White

City of London workforce

in post on 31 March 2018

Police officer	22.8% / 77.2%
Police staff	58.5% / 41.5%
Police community support officer	10.1% / 89.9%

0%   20%   40%   60%   80%   100%

● Female ● Male
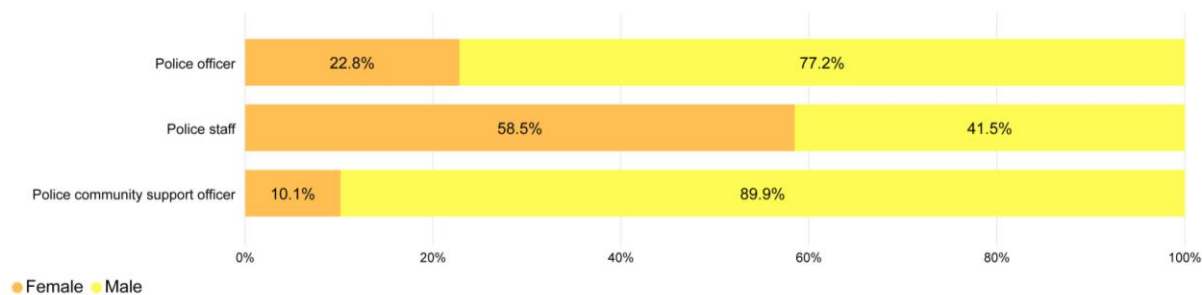
Proportion of workforce without up-to-date security clearance

as of 1 April 2018

3%

How legitimately does the force treat the public and its workforce?

Requires improvement

Summary

The force requires improvement in the legitimacy with which it treats the public and its workforce.

Its leaders understand and value the benefits of community engagement. There is a positive culture around ethics and fair decision making, both internally and in dealings with the public.

However, a major problem for the force is a lack of external scrutiny. The local independent advisory group and the community scrutiny group have not been functioning for some time.

The force's supervision of stop and search has improved during 2018, as has its monitoring of stop and search data. However, it could also do more to analyse its use of these powers.

In relation to ethical and lawful workforce behaviour, the force requires improvement. It needs to improve its anti-corruption assessment and control strategy, which are currently of a low standard. It also needs to improve the capacity and capability of its counter-corruption units.

Treating the public fairly

⬤⬤◯◯

Requires improvement

The force needs to improve the way it treats the public.

Its leaders understand and value the benefits of community engagement. It has a positive culture on ethics and fair decision making, both internally and in dealing with the public. The force tailors its communications to the needs of its communities – using its bilingual officers to translate messages into Urdu for its large Bangladeshi community.

However, a major problem for the force is lack of external scrutiny. The local independent advisory group and the community scrutiny group have not been functioning for some time. It has proved hard to get these groups up and running again due to the small residential population in the area. The force has invited members of similar groups in neighbouring areas to join a new advisory group in the City of London, but this is not yet in place.

The force's supervision of stop and search has improved during 2018. It has also improved its monitoring of stop and search data. However, it could do more to analyse its use of these powers. Its policy on body-worn video cameras does not state that officers should start recording at the beginning of a stop and search. Also, not all of its workforce has received training in unconscious bias.

> **Areas for improvement**
> - The force should ensure that effective external scrutiny takes place in relation to the its use of force.
> - The force should ensure that effective external scrutiny takes place in relation to its stop and search powers.
> - The force should extend its unconscious bias training to all its workforce.

We set out our detailed findings below. These are the basis for our judgment of the force's performance in this area.

Treating people fairly and respectfully

City of London Police leaders understand and value the benefits of community engagement, fairness and transparency in decision making. Fairness is one of the force's values and this is evident in its leadership training. Officers and staff told us they felt empowered to make decisions. We found evidence that the Code of Ethics and fair decision making are considered in senior management meetings, about areas from finance to operational effectiveness. This positive culture sets a good example for the workforce and encourages them to treat the public fairly.

The force engages well with the public and officers make effective use of social media. The force took advice from other forces about how best to use social media and has

improved this service as a result. It makes sure that its workforce is aware of national guidelines on social media use.

This work is supplemented by a corporate magazine aimed at a public readership. In its latest survey, it asked readers about fairness and respect shown by City of London Police's workforce, among other things. The force will tailor its communications strategy in response to feedback that the public want to use email and social media to communicate.

The force tailors its approach to engagement according to the needs of different communities. There is a large Bangladeshi community in the City of London, and the force is using its bilingual officers to translate community messages into Urdu. The area is also home to many businesses and banks, and the force has found supportive ways to engage with them, such as attending seminars and asking officers to spend time talking to staff.

Both residents and businesses in the local area influence policing priorities. For example, at community meetings people raised concerns over aggressive begging and repeated shoplifting. The force does not have a neighbourhood watch scheme, due to the size and make-up of the City of London. Instead it uses volunteers and the special constabulary to involve local people in its crime prevention and problem-solving activities. The local independent advisory group and the community scrutiny group have not been providing adequate scrutiny for some time, and the force recognises this as a problem. Despite attempts to address this, there have been difficulties attracting local people to take part, due to the small resident population in the area. The force has invited members of similar groups in neighbouring areas to join a new advisory group in the City of London, but this is not yet in place.

Most, but not all, of the workforce receive unconscious bias training, aimed at helping them to identify and overcome any biases they may have. It is part of initial training for new officers, vulnerability training and ongoing stop and search training – but the force should offer this training to all its workforce.

Using force

In the last 12 months, almost all officers have been trained in how to use force. Those we spoke to could describe how to do so fairly and proportionately. Although it submits its use of force data in line with National Police Chiefs' Council guidelines, we found during our recent custody inspection that City of London Police does not properly record all the uses of force in custody suites. As a result, it doesn't know the extent to which force is being used fairly and appropriately in custody suites.

The force has a new, comprehensive dataset on this issue, but it doesn't monitor use of force by individual officers. This means that it is difficult for the force to see trends or check that all officers are using force appropriately and fairly. Supervisors do not review CCTV footage from custody or body-worn video footage, and the force's policy on the use of body-worn video cameras does not make it clear to officers when they should turn the recording on.

It is positive that the public can see the whole use of force dataset on City of London Police's website. However, this does not compensate for the lack of effective external scrutiny.

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Using stop and search powers

The supervision of stop and search in the City of London has vastly improved during 2018. Supervisors are now checking stop and search records and referring them back to officers when needed. The force has low numbers of stop and searches and so can scrutinise each record. All officers have received training in stop and search.

We reviewed a representative sample of 452 stop and search records to assess the reasonableness of the recorded grounds. We found that 75 percent had reasonable grounds recorded. Our assessment is based on the grounds recorded by the searching officer and not the grounds that existed at the time of the search.

In our 2017 legitimacy report, we recommended that all forces should:

* monitor and analyse comprehensive stop and search data to understand reasons for disparities;
* take action on those; and
* publish the analysis and the action by July 2018.

We found that the force has complied with some of this recommendation. But it doesn't:

* separately identify drug possession and supply-type offences to understand the extent to which they differ between people from different ethnicities; or
* identify the prevalence of possession-only drug searches and how they align with force-level priorities.

Since last year, the force's monitoring of stop and search data has also improved significantly. Its governance group for stop and search is well attended by members of the force, including training and learning department staff and representatives from staff groups. There is a new stop and search lead, who has brought renewed focus to improving the force's use of these powers. The force published an explanation of the disparity between the use of stop and search on black, Asian and minority ethnic people and others in its public data on its website.

However, there is still room for improvement. The force does not monitor people who are searched numerous times or officers who use stop and search unusually frequently. Nor does it monitor body-worn video footage of stop and search encounters. As mentioned above, the force policy on body-worn video cameras does not state that officers should turn on the recording at the start of a stop and search. The force acknowledges that it needs to do further analysis aimed at improving its use of stop and search.

The force does not currently have effective external scrutiny of stop and search, but it is trying to address this, as outlined above.

Ethical and lawful workforce behaviour

Requires improvement

The force needs to improve its ethical and lawful workforce behaviour. Its leaders and workforce understand the Code of Ethics and its principles of integrity, fairness and professionalism. However, the force needs to improve its anti-corruption assessment and control strategy, which are currently of a low standard. It has not yet completed its anti-corruption strategic assessment for 2019. It does not use organisational information such as email accounts and logs from crime reports to identify those who are at risk of corruption.

It also needs to improve the capacity and capability of its counter-corruption units. The anti-corruption unit does not have enough staff to seek out corruption. Also, the force cannot yet fully monitor all its IT systems because the software has limited capability and is not compatible with all the force's IT systems.

The force has not yet addressed an earlier national recommendation to form links with agencies that support victims to look for information about police officers abusing their position for a sexual purpose.

Areas for improvement

- The force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up-to-date and include current data.
- The force should ensure that its counter-corruption unit:
  - has enough capability and capacity to counter corruption effectively and proactively;
  - can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the force's data and identify computer misuse; and
  - builds effective relationships with individuals and organisations that support and work with vulnerable people.

We set out our detailed findings below. These are the basis for our judgment of the force's performance in this area.

Maintaining an ethical culture

Leaders continue to promote the Code of Ethics with its emphasis on integrity, fairness and professionalism, and the wider workforce understands these principles. The principles set out in the code appear prominently in all strategic documents, such as the policing plan and the corporate plan, and a Code of Ethics impact assessment is also now included in report templates for strategic boards.

The workforce can discuss ethical dilemmas in a variety of different ways. Several officers and staff have volunteered to be members of the challenge forum and are

called 'ethics associates'. Their role is to raise ethical questions around everyday activities and decisions.

The force is a founding member of the London forces collaborative ethics panel (the London Police Challenge Forum). This has recently been relaunched and we will assess its effectiveness over the next 12 months. The force also has an integrity standards board, which is chaired by the assistant commissioner. This considers individual officers and staff and organisational integrity, and the workforce spoke highly of it. The professional standards department uses this board to publicise lessons learned from misconduct investigations and grievance complaints.

In 2016, we recommended that, within two years, all members of the police workforce should have received at least the lowest level of vetting clearance for their roles. The force has now achieved this: there is no backlog of vetting health checks, aftercare and renewals.

An intranet page and a quarterly newsletter are the main channels for clarifying and reinforcing acceptable and unacceptable behaviours for the workforce. These also include details from misconduct cases. The professional standards department runs a learning and development forum that includes material from the Independent Office for Police Conduct (IOPC) and provides training to supervisors and probationers.

Tackling corruption

The force has not yet completed its anti-corruption strategic assessment for 2019, but the standard of its current assessment is not good. It contains out-of-date information and does not include profiles of potentially corrupt officers or key locations for corrupt activity. The force's local counter-corruption control strategy is also of a low standard. It does not include communication and engagement with the workforce and partners, including charities that work with vulnerable victims. It has not been widely shared in the force. However, the anti-corruption unit is making progress in implementing its measures.

The force does not use organisational information, such as email accounts and logs from crime reports, to proactively identify those people who are at risk of corruption. However, some are identified through its vetting and performance review process, and they are asked to attend an early intervention meeting. Following this, the officer is subject to further checks for a set time.

The anti-corruption unit is not staffed to a level where it can look for corruption. The force cannot yet fully monitor all its IT systems because the software has limited capability and is not compatible with all the force's IT systems. This means the force must rely on audits of individual systems, which can be time-consuming.

In 2016, we made a national recommendation that all forces should form links with agencies that support vulnerable victims to look for information about police officers abusing their position for a sexual purpose. The force has not yet addressed this. Nor has it addressed the other elements of our 2016 recommendation regarding the capacity within the anti-corruption unit and its ability to monitor IT systems. Anti-corruption unit staff have worked with some external organisations, such as outreach workers and victim liaison. However, this work has not been followed up, which means that the force cannot reliably claim to have tackled this issue.

However, the force recognises the [abuse of position for a sexual purpose](#) as serious corruption, and this is reflected in its counter-corruption strategic threat assessment and control strategy. All the cases we reviewed had been appropriately referred to the IOPC. The force has given guidance and briefings to recruits, transferees and supervisors. It should do so for other officers and staff.

Treating the workforce fairly

Good

This question was not subject to detailed inspection in 2018/19, and our judgment from the 2017 legitimacy inspection has been carried over.

Annex A – About the data

Data in this report is from a range of sources, including:

- Home Office;
- Office for National Statistics (ONS);
- our inspection fieldwork; and
- data we collected directly from all 43 police forces in England and Wales.

When we collected data directly from police forces, we took reasonable steps to agree the design of the data collection with forces and with other interested parties such as the Home Office. We gave forces several opportunities to quality assure and validate the data they gave us, to make sure it was accurate. For instance:

- We shared the submitted data with forces, so they could review their own and other forces' data. This allowed them to analyse where data was notably different from other forces or internally inconsistent.
- We asked all forces to check the final data used in the report and correct any errors.

We set out the source of this report's data below.

Methodology

Data in the report

British Transport Police was outside the scope of inspection. Any aggregated totals for England and Wales exclude British Transport Police data, so will differ from those published by the Home Office.

When other forces were unable to supply data, we mention this under the relevant sections below.

Population

For all uses of population as a denominator in our calculations, unless otherwise noted, we use ONS mid-2017 population estimates. This was the most recent data available at the time of inspection.

Survey of police staff

We surveyed the police workforce across England and Wales, to understand their views on workloads, redeployment and how suitable their assigned tasks were. This survey was a non-statistical, voluntary sample so the results may not be representative of the workforce population. The number of responses per force varied between 32 and 365. So we treated results with caution and didn't use them to assess individual force performance. Instead, we identified themes that we could explore further during fieldwork.

BMG survey of public attitudes towards policing (2018)

We commissioned BMG to survey public attitudes towards policing in 2018. Ipsos MORI conducted a similar version of the survey in 2015–2017.

The survey consisted of about 400 respondents for each of the 43 forces. Most surveys were completed online, by members of online research panels. However, a minority of the surveys (around 750) were conducted face-to-face. These face-to-face surveys were specifically targeted to groups that are traditionally under-represented on online panels. This aimed to make sure the survey respondents were as representative as possible of the total adult population of England and Wales. A small number of respondents were also surveyed online via postal invites to the survey.

Results were weighted by age, gender, ethnicity and indices of multiple deprivation to match population profiles. The sampling method used is not a statistical random sample and the sample size was small, which may be more problematic for larger force areas compared to small ones. So any results provided are only an indication of satisfaction rather than an absolute.

The findings of this survey, and previous surveys, are available on our website.

Review of crime files

We reviewed police case files for these crime types:
- theft from person;
- rape (including attempts);
- stalking;
- harassment;
- common assault;
- grievous bodily harm (wounding); and
- actual bodily harm.

Our file review was designed to provide a broad overview of how well the police:
- identify vulnerability;
- conduct investigations; and
- treat victims.

We randomly selected files from crimes recorded between 1 January and 31 March 2018 and assessed them against several criteria. We reviewed 60 case files in each force, except for West Midlands Police and Greater Manchester Police where we reviewed 90.

For our file review, we only selected a small sample size of cases per force. So we didn't use results from as the only basis for assessing individual force performance, but alongside other evidence.

Force in context

999 calls

We collected this data directly from all 43 police forces in England and Wales.

Recorded crime and crime outcomes

We took this data from the December 2018 release of the Home Office police recorded crime and outcomes data tables.

Total police-recorded crime includes all crime (except fraud) recorded by all forces in England and Wales (except BTP). Home Office publications on the overall volumes and rates of recorded crime and outcomes include British Transport Police, which is outside the scope of this inspection. So England and Wales rates in this report will differ from those published by the Home Office.

Police-recorded crime data should be treated with care. Recent increases may be due to forces' renewed focus on accurate crime recording since our 2014 national crime data inspection.

Other notable points to consider when interpreting outcomes data are listed below.

- Crime outcome proportions show the percentage of crimes recorded in the 12 months ending 30 September 2018 that have been assigned each outcome. This means that each crime is tracked or linked to its outcome. So this data is subject to change, as more crimes are assigned outcomes over time.

- Under the new framework, 37 police forces in England and Wales provide outcomes data through the HODH every month. All other forces provide this data via a monthly manual return.

- Leicestershire, Staffordshire and West Yorkshire forces participated in the Ministry of Justice's out of court disposals pilot. As part of the pilot, they stopped issuing simple cautions or cannabis/khat warnings and restricted their use of penalty notices for disorder for adult offenders. These three forces continued to follow these procedures since the pilot ended in November 2015. Later, other forces also limited their use of some out of court disposals. So the outcomes data should be viewed with this in mind.

For a full commentary and explanation of outcome types please see the Home Office statistics, Crime outcomes in England and Wales: year ending March 2018.

Workforce figures (including ethnicity and gender)

We took this data from the Home Office annual data return 502. The data is available from the Home Office's published police workforce England and Wales statistics or the police workforce open data tables. The Home Office may have updated these figures since we obtained them for this report.

The data gives the full-time equivalent workforce figures as at 31 March. The figures include section 38-designated investigation, detention or escort officers, but not section 39-designated detention or escort staff. They include officers on career breaks and other types of long-term absence but exclude those seconded to other forces.

Spend per head of population

We took this data from the HMICFRS value for money profiles.

These profiles are based on data collected by the Chartered Institute of Public Finance and Accountancy, through the Police Objective Analysis. The spend over time figures are adjusted for inflation. The population figures are ONS mid-year estimates, with the 2018/19 value calculated by assessing the trend for the last five years. More details on this data can be found on our website.

Vetting data (workforce without up-to-date security clearance)

We collected this data directly from all 43 police forces in England and Wales.

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Committee(s)	Dated:
Police Authority Board – for information Independent Custody Visitor Panel – for information	16 May 2019 10 July 2019
Subject: Independent Custody Visiting Scheme Annual Report 2018/19	**Public**
Report of: Town Clerk	**For Information**
Report author: Craig Spencer, ICV Scheme Manager, Town Clerk's Department	

Summary

This report completes the requirement to update Members on the progress of the City of London's Independent Custody Visiting Scheme, presenting the Panel's Annual Report and informing Members of some of the recent issues raised by the ICV Panel in relation to custody provision in the City. Issues raised at the Panel meetings over the past year include recommendations from the HMICFRS/HMIP Custody Inspection and the performance of partner services including the appropriate adult (AA) service and custody healthcare.

Recommendation(s)

Members are asked to note the contents of this report.

Main Report

Background

1. The existing Independent Custody Visiting Scheme has been operational, in its current form, since November 2007. As part of the Scheme, Members agreed at the Police Committee in May 2009 that a regular report would come to Committee on an annual basis, and this report fulfils that requirement.

2. Members may recall that Independent Custody Visitors (ICV) make unannounced visits in pairs to custody suites to monitor and report on the treatment and conditions of individual detainees on an entirely independent and confidential basis. They are there to look, listen and report on conditions in custody at the time of their visit, and report what they see through to the Force and the ICV Panel, which is made up of all the visitors.

3. The City Visitors have all been trained in conjunction with the Independent Custody Visiting Association and the Mayor's Office of Policing and Crime. Further refresher training is given to the Panel, which meets quarterly, on specific topics such as mental health. ICVs have also attended police training on issues such as vulnerability, restraint and use of force.

4. The visits take place on a three in two weeks basis for Bishopsgate Police Station as agreed between the Scheme and the City of London Police (CoLP). The visitors will also visit if Snow Hill Police Station, and now Brewery Road (as part of the collaboration with the British Transport Police), are used as an overflow or a reserve facility.

5. Each visit is recorded by the two visitors who complete a short form covering any issues for concern following interviews with the detainees. The forms now adhere to the recently produced national standards and reporting guidance. Copies of each completed form are then sent to the Custody Manager, the Scheme's Administrator in the Town Clerk's Office, and the Superintendent for action if necessary. The Panel should be commended for completing over 97% of visits over the previous year with more detainees interviewed than ever before.

6. Meetings of the ICV Panel continue to take place on a quarterly basis and are attended by all Custody Visitors together with representatives from the Town Clerk's Department, City of London Police (normally the custody manager) as well as the Board's representative Nick Bensted-Smith.

7. The Panel reviews the record of visits since the last meeting and visitors are able to ask detailed questions of the representatives of the Force, including the custody manager, about any issues which concern them. Finally, the Panel considers more general policy aspects and the administration of the Scheme such as the visit rota and availability.

8. The ICV Panel would like to put on record its thanks to Richard Lewartowski, who unfortunately passed away in 2018. Richard had joined the Independent Custody Visitor scheme in March 2016 and his work ethic and important contributions have supported its recent progress, including in his role of Vice-Chairman.

9. The Panel also records their thanks to Chairman Godfrey Baillon-Bending and Heather Thomas who was elected Vice-Chairman in October 2018. Craig Spencer, the Scheme Manager, has continued the role on the National Board for the Independent Custody Visitor Association as a Member Director, but will resign the post later this year due to a change of role.

10. The Panel has been rated as a Silver scheme by the National Association as part of their assessment framework. Considering the size of the scheme this is essentially the highest level the scheme could receive and shows the scheme as a lead in best practice. The process also provided some best practice from other PCCs which has been adopted, including performance monitoring for ICVs to ensure consistent standards across the Panel.

Panel Issues in 2018/19

11. This year the Panel has produced its ninth Annual Report, which is attached at Appendix A. This reports on the Panel's performance over the last 12 months, provides information about the visits made and issues raised as a result and,

finally, sets out the Panel's objectives for 2019/20. Key issues raised at the Panel meetings include the following:

a) **HMICFRS/HMIP Custody Inspection** – The Chairman of the ICV Panel and the Scheme Manager were interviewed as part of the process and the ICV Panel was praised within the report for their input and also how the custody team reacted to issues raised by the Panel. The primary issues highlighted were poor record keeping, lack of strategic oversight and the current provision of facilities available (including a lack of an exercise yard) at Bishopsgate. However, it should be acknowledged that this was an encouraging inspection and the culture within custody was highlighted as a positive. The Panel will now work with the CoLP to address some of the recommendations and ensure ICVs are checking some of the more crucial points raised in the report.

b) **Voluntary Attendance –** A concern was raised from the Panel and ICV Scheme Manager that PACE (Police and Criminal Evidence Act) and the current Health Care Professional contracts do not currently cover voluntary attendance, which is being increasingly used across the country. Work is starting to look at how ICVs can protect welfare of those under voluntary attendance. The new AA contract will also consider voluntary attendance within this.

c) **Custody Healthcare –** The service has improved throughout the year after ICVs raised issue about the availability of healthcare professionals within custody. The service, although not embedded, is now performing well and is working effectively with the liaison and diversion service.

d) **Appropriate Adults –** The Panel and the custody manager have been concerned with the provision of AAs out of hours and for vulnerable adults. The contract is commissioned by Community and Children's Services and is currently being revised to appropriately address out of hours and vulnerable adult provision. The HMIC report raised two issues around AAs including the identification of vulnerable adults and the issue of AAs not being present for checking-in of detainees.

Legal Implications

12. In accordance with Section 51 of the Police Reform Act (2002), the City Corporation is required to have in place an Independent Visitors Scheme.

Conclusion

13. The Independent Custody Visiting Scheme is now well-established, and the Panel is pleased to present its annual report to the Police Authority Board. The areas that custody and ICVs now cover has broadened but the Panel has continued to be a critical friend for the Force. Further updates on this Scheme will continue to be provided to Members on an annual basis.

Appendices

- Appendix 1 – ICV Annual Report 2018/19

Background Papers

Annual Custody Report – November 2018 Police Committee
ICV Guidelines – January 2017 Police Committee

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City of London

Independent Custody Visiting Scheme

Annual Report

May 2019

Foreword, by the Chairman of the ICV Panel (Godfrey Baillon-Bending)

The City of London Independent Custody Visiting scheme has had a successful year adapting to policy, changes in personnel and details about how the Panel is run. I have been well assisted by the Vice-Chair Heather Thomas and other Panel members who have made 2018-19 a successful year for the Panel. The City of London Police Force main custody suite continues to be located at Bishopsgate Police Station. The second custody suite at Snow Hill Police Station is now rarely used, even as an overflow. The collaboration with the British Transport is now active and we are investigating about how custody visitors can support this arrangement in future.

Visits to Bishopsgate continue, on the whole, to be excellent with good support from the officers in the custody suite. This was backed up by the HMICFRS/HMIP inspection which took place which outlined the positive culture within the Force and many areas where they lead on best practice. The inspection also highlighted the value of our scheme and the readiness for officers to respond to our concerns. The inspection report did also raise some issues that the Panel will now check upon more regularly: ensuring appropriate adults are present for the check in process and for vulnerable adults; the use of CCTV during strip searches and also some of the facilities within the suite. With the impending introduction of spit guards and leg restraints, the Panel are to be involved in the initial training to ensure that the equipment is used in a proportionate manner.

The healthcare service has improved throughout the year with thanks to the visitors for continuing to raise this issue; additionally, the liaison and diversion service has been very valuable when observing their input to a detainee's welfare. It has also been encouraging to see that maintenance problems are being reported less by the ICVs and that the contractor is performing stronger in this area.

The relationship with the custody staff has continued to be extremely positive this year with comments from all visitors on the friendliness of the staff when conducting their visits. I have been involved in training new custody staff aiding this relationship further. Additionally, given previous staffing issues associated with custody last year, I am glad to say that these problems have improved but this will be something that the Panel will be kept aware of over the ensuing year. There has, however, been turnover in the role of custody manager and this is something I continue to raise with senior leadership to ensure the high-risk area of custody gets the appropriate level of attention it requires.

In my first year as Chairman, we have been able to introduce a new national reporting form which has improved the current processes for escalating issues. We have also provided training on several issues for the Panel including mental health, young persons in custody and the use of restraint techniques. The scheme also received the Silver Award from National Association outlining the effectiveness of the scheme and I look forward to picking up the award later this year. This process allowed us to develop best practice from other schemes including our developing relationship with the MOPAC scheme.

I give my thanks to my fellow custody volunteers for their hard work this year, and especially to our new visitors who have fitted in seamlessly. I would also like to thank the City of London Police and Civilian Detention Officers for enabling us to successfully carry out our responsibilities in 2018-2019.

I would also like to thank Craig Spencer, the Scheme Manager and Richard Holt, the Scheme Administrator for their hard work throughout the year. It is likely to be their last year working on the scheme due to changing work priorities, so a huge congratulations to Craig and Richard for their work on the Panel over the last few years and the healthy position the Panel is now in is down to their hard work.

Finally, I would like to pay tribute to Richard Lewartowski, who unfortunately passed away in 2018. Richard had joined the Independent Custody Visitor scheme in March 2016 and his contribution and support have aided the Panel's recent progress, including in his role of Vice-Chairman.

2

Welcome to the 2018-19 annual report of the City of London Independent Custody Visiting Scheme.

The Court of Common Council, as the police authority for the Square Mile, has a responsibility for securing an efficient and effective police service in the City of London and holding the Commissioner of the City of London Police to account. Under paragraph 51 of the Police Reform Act 2002, the City of London is required to have in place an Independent Custody Visitors Scheme.

Independent custody visiting schemes have been around since the 1980s following the Lord Scarman Report and became mandatory in 2003. The Scarman Report recommended a system of independent unannounced inspection of detention arrangements in police stations by local community members. Custody Visiting Panels remain a vital important means of securing police accountability for the local communities they serve.

City Visitors are volunteers who give up their free time to provide independent scrutiny of the treatment of those held in police detention and the conditions in which they are held. They continue to play a vital role in bringing together police and communities closer together and enhancing public perception of police procedures and practice in relation to custody.

We would like to thank all the City's Visitors for their commitment to the Scheme. The Police Committee appreciates their hard work and firm commitment to the Scheme and the contribution this makes to the overall confidence the community has in the City of London Police.

Doug Barrow
Chairman
Police Committee

Nicholas Bensted-Smith
ICV Panel Member
Police Committee

Introduction

THE CITY OF LONDON INDEPENDENT CUSTODY VISITING SCHEME (ICV SCHEME)

The purpose of this report is to give an account of the work of the City of London ICV Scheme in the period 1 April 2018 to 31 March 2019. It aims to:

- report on the Panel's performance;
- provide the local community and the Police Committee with information about the visits made and what they have revealed about the treatment of detainees;
- set out issues and concerns that the visits have raised; and
- set out the objectives for 2019/20.

The City of London Corporation, in its role as the police authority for the City of London, has a statutory duty to have in place an independent custody visiting scheme. The operation of the Scheme is the responsibility of the Police Committee.

Independent custody visiting is governed by a range of legislation and guidance including the Police and Criminal Evidence Act (PACE) 1984 and Home Office Codes of Practice and National Standards.

Independent Custody Visitors (ICVs) are members of the local residential and business community who volunteer to visit police stations unannounced to check on the treatment and welfare of people held in police custody. They must:

- be over 18;
- be independent from the police force and the police authority; and
- have no direct involvement in the criminal justice system.

The City of London ICV Panel currently consists of 12 (this is the maximum number required) visitors who visit the custody suites at Bishopsgate Police station three times every two weeks. Programmed visits to Snow Hill custody suite will now cease due to its inactivity, however potential further visits to the Brewery Road facility may take place, although this is covered by MOPAC Visitors. A member of the Police Committee attends the quarterly Panel meetings and representatives of the Force attend for part of the Panel meetings so that any queries or problems that have arisen out of custody visits can be addressed. The meetings are supported by staff from the Town Clerk's department (ICV Scheme Manager and Coordinator).

THE ROLE OF INDEPENDENT CUSTODY VISITORS

Visits are always made in pairs, and are unannounced. The objective of all visitors is to monitor and report on the treatment and conditions of individual detainees and to check that their rights and entitlements have been upheld.

During their visit, ICVs are escorted by a custody officer at all times. Every detainee being held is offered the opportunity to speak with the custody visitors (unless they are not to be disturbed when they are asleep during their rest period or are a safety risk) but may choose not to. Visit interviews are carried out within sight, but out of hearing, of the escorting officer. Strict rules of confidentiality apply so that detainees are identified by their custody numbers only, and the details of what visitors see and hear are treated as confidential. ICVs are not concerned with any alleged offence and maintain their independence and impartiality at all times. They do not provide advice to detainees; they are

there to look, listen and report on conditions in custody at the time of their visit.

After every visit, custody visitors fill out a report form recording details of the visit. The information about the visit in the form includes details of problems that were resolved immediately and those that required further action. Copies of the reports are provided for the Superintendent (if appropriate), the Custody Manager and the Scheme Manger on behalf of the Police Committee. The forms now align with national standards and focuses on actions for the Force and the Scheme Manager.

The ICV Panel will then follow up and discuss at the next review meeting any concerns that cannot be resolved during visits. If necessary, more serious issues can be highlighted directly to the Police Committee or dealt with outside Panel meetings.

PANEL MEETINGS

The quarterly Panel meetings allow Visitors to discuss each visit and any issues that have arisen. In addition, short update or information sessions are often included on each agenda so that Visitors are kept up to date with any national developments concerning the custody environment. Topics discussed this year included:

HMICFRS/HMIP Inspection – An unannounced Custody Joint Inspection by the Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services and Her Majesty's Inspectorate of Prisons (HMICFRS/HMIP) of the City of London's Custody Suite in November 2018. The Chairman of the ICV Panel and the Scheme Manager were interviewed as part of the process and the ICVs were praised for their input and how the custody team reacted to issues raised by the Panel. The primary issues highlighted were poor record keeping, lack of strategic oversight and the current facilities available at Bishopsgate. However, it should be acknowledged that this

was an encouraging inspection and the culture was highlighted as a positive.

The areas for improvement (AFIs) will be addressed by the Force and there will be a response to the inspection report when this is published. The recommendations and AFIs from the report will be included in the regular HMICFRS updates that go to the quarterly Police Performance and Resource Management Sub Committee for Member scrutiny.

Panel Training – The Panel have received training on vulnerable detainees, particularly around mental health (October Panel) and young persons and children in custody (April Panel). This has included inviting partners to present on their work including the Liaison and Diversion service in the City. The Vice Chair, Chairman and Scheme Manager have all been involved in training for new custody sergeants and gaolers explaining the role of ICVs. ICVs will also be attending future Vulnerability and Use of Force training which is delivered to CoLP Officers.

National Accreditation – The Panel has been rated as a Silver scheme by the National Association as part of their assessment framework. Considering the size of the scheme this is essentially the highest level the scheme could receive and shows the scheme as a lead in best practice. The process also provided some best practice from other PCCs which has been adopted, including performance monitoring for ICVs to ensure consistent standards across the Panel.

Reporting Forms – The Panel have also introduced new reporting forms to adhere to recently introduced national standards. The forms now allow visitors to focus on vulnerable detainees and their treatment. Any issues raised by visitors are now more easily identified and further details can now be given.

5

Annual Update on Custody – the third annual update to Police Committee was received in September and focused on the statistics for young persons and children as well as those with mental health problems in custody and any changes in policy that have occurred over the year. Due to this being the third iteration, trends are now being formed and be monitored over a longer period to assess any changes to the nature of custody in the City of London.

In addition to the points above the Panel have raised a number of other issues with the Custody Manager and other partners:

1) **Voluntary Attendance** – A concern was raised from the Panel and ICV Scheme Manager that PACE and Health Care Professional contracts do not currently cover voluntary attendance – as such, the Force are investigating that those that do voluntary attend and are vulnerable, are appropriately supported.

    Outcome – The Standard Operating Procedure (SOP) for voluntary attendance has been updated and CoLP are investigating how ICVs can be involved in the process. This is increasingly important given the increased use of voluntary attendance.

2) **Custody Healthcare** – The Panel has raised the issue of an irregular service at Bishopsgate from the contractor G4S. Although this is not an embedded service, it was found that the call out times were excessively long, and this meant that detainees were waiting hours for treatment. The ICV Panel continued to check this issue throughout the year and the overall service being provided, including the liaison and diversion service.

    Outcome – The ICV Panel have noted an improvement in the availability of the

healthcare professionals and this has resulted in the service increasing their call out target (which is above 90%).

3) **Appropriate Adults** – The Panel and the custody manager have been concerned with the provision of appropriate adults (AA) out of hours. The contract is again commissioned by CCS and there was particular note within the HMICFRS/HMIP report about the poor provision especially when identifying vulnerable adults. There was also a 'cause for concern' within the report identifying the issue of AAs not being present for checking in of detainees.

    Outcome – The ICV Scheme Manager has been involved in drafting the new AA contract and the provision of the service for vulnerable adults is more explicitly addressed. The contract will also include references to voluntary attendance. The Custody – Juvenile detainee SOP has been edited to ensure minimal delay to AA's being present while detainees are provided their rights and entitlements.

4) **Dignity of Detainees** – The HMICFRS/HMIP inspection and the Panel raised an issue around CCTV protocol when strip searching detainees. It was the case that the CCTV monitors were not switched off within custody and were visible to several persons in the suite when strip searches were taking place.

    Outcome – The relevant SOP has been changed and custody officers have been made aware of this issue. ICVs will continue to monitor the issue when viewing relevant custody records.

Visit Statistics

	Total number of detainees in Custody at time of visit	No of detainees offered visit	No. of detainees accepted visit
Bishopsgate Q1	40	20	17
Bishopsgate Q2	35	22	16
Bishopsgate Q3	48	37	34
Bishopsgate Q4	20	19	19
Total	143	98	86

ISSUES AND CONCERNS ARISING FROM VISITS

This list of issues and concerns reflects the range of issues that have been raised by detainees in the City of London in the last year and, in addition, other issues which have been reported by ICV Panels elsewhere for which there has been a nil return in the City of London.

	Bishopsgate
No of Total Visits	**57**
Report Form with no matters requiring a police response	31
Infrastructure / furnishings / fittings/out of service	49
Comments individual officers - Positive	21
Comments individual officers – negative	1
Cleaning, tidiness and general hygiene - positive	5
Cleaning, tidiness and general hygiene - negative	4
Information Technology	4
Temperature and availability of blankets	0
Health related matters	3
Procedures not followed	4
Rights and entitlements seemingly delayed	0
Personal hygiene requests– (showers, washing etc)	2
Requests for phonecalls	1
Perceived risk to detainees	0
Periodic checks (15, 30 minutes) not maintained	0
Requests for food and drink	1
Requests for literature	1

Station	Target No of Visits	Achieved	% of Target
Bishopsgate	58	57	98%

DAYS OF VISITS

	No of Visits	% (figure expressed to one decimal place)
Monday	4	7%
Tuesday	12	21%
Wednesday	11	19%
Thursday	7	13%
Friday	17	29%
Saturday	6	1%
Sunday	0	0%
Total	**57**	

TIME OF VISITS

00.01 – 06.00	1
06.00 - 12.00	29
12.01 – 18.00	20
18.01 – 00.00	3

*1 visit did not have the time recorded.

DAYS OF VISITS / TIMES – COMBINED

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
00.01 – 06.00	0	0	0	0	1	0	0
06.00 -12.00	3	6	5	3	11	5	0
12.01 – 18.00	2	5	5	3	3	1	0
18.01 – 00.00	0	0	1	1	1	1	0

2019/20

8

The City of London ICV Panel wants to ensure that it meets its objectives in scrutinising the custody arrangements in the City of London. It has set itself the following targets for 2019/20:

- to continue to promote and raise awareness of the work of the ICV Panel;
- to undertake at least four visits per year between the hours of midnight and 6 am and increase the number of visits in the evening;
- to maintain the consistently high level of visits;
- to undertake visits to Metropolitan Police custody suites (as well as the British Transport Suite at Brewery Road) as part of the ongoing collaboration with MOPAC; and
- To train ICVs in vulnerability and use of force.

Conclusion

The City of London ICV Scheme provides an independent check on the treatment of detained persons. Through the dedication of the volunteer visitors, an appropriate level of scrutiny of the Force is achieved on which the Police Committee and the community can rely.

9

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Committee(s): Police Authority Board	Date(s): 16th May 2019
Subject: Launch of National and Local Protocols on the role of the Police and Crime Commissioners in the Criminal Justice System.	Public
Report of: Commissioner of Police Pol 32-19	For Information
Report author: Detective Superintendent Dermont Robinson Head of Counter Terrorism & Administration of Justice	

Summary

The purpose of the report is to inform members of recent guidance from the Ministry of Justice setting out the role of Police & Crime Commissioners in the Criminal Justice System at national and local levels respectively. These protocols seek to achieve more effective partnership working and strengthened relationships.

The City of London Police is represented on the London Criminal Justice Board where performance is reviewed with additional Force oversight provided through the Performance Management Group.

These current arrangements provide effective oversight of criminal justice performance within the City of London Police, and as such we do not believe there is any need to make any changes following the issuance of the guidance.

Recommendation

Members are asked to note the report.

Main Report

Background and Current Position

1. In line with a 2017 commitment to enhance the role of Police and Crime Commissioners (PCCs), in February 2019 the Ministry of Justice published two protocols, one national (appendix 1) and one local (appendix 2), which suggest ways in which partners should best engage to improve the effectiveness of the criminal justice system.

1

2. These protocols do not seek to prescribe any particular model but highlight the benefits of bringing stakeholders together to focus on shared and individual responsibilities.

3. The national protocol sets out how government will engage with PCCs in the development of criminal justice policy. This will be facilitated by the Association of Police and Crime Commissioners through existing structures.

4. The local protocol encourages PCCs to take a leading role in local criminal justice partnerships and seeks to build on existing arrangements, in particular Local Criminal Justice Boards (LJCB) for which minimum standards are proposed.

5. The City of London Police (CoLP) is a member of the London Criminal Justice Board, a strategic forum chaired by a Metropolitan Police Service Deputy Assistant Commissioner. Additional membership includes representation from British Transport Police, The Mayor's Office for Policing and Crime, Her Majesty's Courts Service, the Ministry of Justice and the Crown Prosecution Service. This membership is consistent with the proposed standards set out in the protocol.

6. Performance is a standing agenda item for this board to consider and to scrutinise.

7. Criminal justice performance within CoLP is monitored within the Crime Directorate and reported to the Force's Performance Management Group for oversight and scrutiny.

Conclusion

8. These existing arrangements provide robust internal and external oversight.

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Appendices

Appendix 1. National Protocol

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Version: 1.0
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Protocol: Engaging Police and Crime Commissioners (PCCs) in national policy

Purpose

This protocol sets out key principles for engagement between national Criminal Justice System (CJS) departments and agencies represented on the Criminal Justice Board and PCCs, the responsibilities the Association of Police and Crime Commissioners (APCC) and PCCs will fulfil in return, and practical methods of taking PCCs' views. The protocol applies to England and Wales.

National Engagement with PCCs

Drawing on lessons learned from current engagement with PCCs and wider good practice, we have identified the following principles which we propose should be applied by national CJS departments and agencies in their engagement with PCCs. CJS departments and agencies will, in general:

1. Engage PCCs on major, national CJS policies and reforms influencing the local context.

2. Engage PCCs early in the development and testing of CJS policies and reforms to ensure these take into account, and adequately reflect, the local context and local priorities.

3. Update PCCs on the implementation of national policies and reforms and, where appropriate, agree with PCCs their role in supporting implementation locally.

4. Inform PCCs of key developments or changes in national policies, reforms and practice in a timely manner, where necessary providing background on the underpinning rationale for changes.

5. Update PCCs on ministerial and Criminal Justice Board priorities, and provide relevant supporting information to assist PCCs in addressing these priorities at the local level.

PCC responsibilities

To maximise the effectiveness of national engagement, PCCs will be expected to perform key functions in return. PCCs will:

1. Provide local perspectives and steers on national policies and reforms, highlighting potential challenges, opportunities and variations at the local level.

2. When requested by policy leads, communicate information on national developments and Criminal Justice Board and ministerial priorities within their local areas, helping to ensure priorities are addressed locally.

3. Help support the implementation of national reforms and policies locally, as agreed with national policy leads.

Principles governing engagement

1. Policy leads within the relevant government department will be responsible for determining which policies or reforms are of sufficient magnitude to merit engagement with PCCs and the most apposite time to engage with PCCs during policy development.

2. Any information, data or policies which are sensitive, or have implications for prosecutorial or judicial independence or national security are not covered by the principles of this agreement.

3. PCCs will be expected to treat any information shared with them as strictly confidential, and ensure information is not circulated or disseminated further unless explicitly advised otherwise by policy leads. PCCs should seek advice and clarification from policy leads on a case by case basis where necessary.

Facilitating engagement

The Association of Police and Crime Commissioners (APCC) is the membership organisation for PCCs, enabling them to express their collective view on policy issues and engage as a body with national criminal justice agencies and departments. To engage effectively with PCCs and take their collective rather than individual views, national CJS agencies and departments will generally work through the APCC or a delegated sub group, to engage with PCCs.

In most cases engagement will be through the APCC's standing groups which focus on specific policy areas. Where national policymakers need to engage with a broader range of PCCs beyond those participating in the standing group structure, the APCC should, generally, be consulted on how to take forward this wider engagement.

National leads can also engage with the Association of Policing and Crime Chief Executives (APACE), which brings together Chief Executives from PCCs' offices, to help work through technical details or practical local implications, arising from policies or reforms.

Next Steps
Once this protocol is agreed with PCCs and cross-CJS senior leaders represented on the Criminal Justice Board, its operation will be periodically reviewed by the APCC to ascertain whether it is fulfilling its core objectives of facilitating effective national engagement, or whether further action is needed.

Appendix 2. Local Protocol.

Local Forums and the role of Police and Crime Commissioners:
Local Operating Framework

Purpose

This Local Operating Framework sets out how Police and Crime Commissioners (PCCs) can play an active role in local Criminal Justice System (CJS) forums to improve co-ordination and achieve shared CJS outcomes.

Within this framework, we have referred to the role of the PCC in relation to the criminal justice system. It should be understood, however, that the PCC does not have authority over the criminal justice system from the decision to make a criminal charge, through to the award of sentence. In devolving greater responsibility to PCCs, the boundaries around the independence of criminal justice processes between charging and sentencing must be respected. All local forums must respect both prosecutorial and judicial independence and decision making. Whilst taking account of independence issues, there will still be occasions where it is appropriate for members of the judiciary to participate in conversations.

Local Operating Framework

The Police Reform and Social Responsibility Act 2011 set out in law the reciprocal duty on PCCs and other Criminal Justice agencies to work together to provide an efficient and effective CJS for police force areas. One way this works effectively is through Local Criminal Justice Boards (LCJBs). The Criminal Justice Inspectorate report stated: *"we were told that PCCs were shaping the way that local partnerships were working, based on their outreach into the community in general and to victims of crime in particular."* **By taking a leading role in local CJS partnership arrangements, PCCs can help CJS partners and agencies become more visible in the local area and help align and set priorities and address cross-cutting local issues.**

This is already happening in many areas. The independence of the prosecution and judiciary must be reflected within any partnership arrangements. To ensure engagement is appropriate we therefore propose the following minimum standards to encourage appropriate local CJS engagement in each local area, consistently across England and Wales. This protocol may also apply to Regional Partnership arrangements, as well as local partnership arrangements such as Local Criminal Justice Boards.

Membership
The view of the National Criminal Justice Board (CJB) is that PCCs should chair local forums which, to be effective, should include membership and engagement from all CJS partners. At the local level, it is recommended that membership should include:

- The Police and Crime Commissioner (PCC)
- A Chief Police Officer
- A representative from the Crown Prosecution Service (CPS)
- A representative from Her Majesty's Courts and Tribunal Service (HMCTS)
- A representative from Her Majesty's Prison and Probation Service (HMPPS)
- A representative from the National Probation Service (NPS) / Community Rehabilitation Company (CRCs)
- A representative from the Youth Offending Team
- A Legal Professional e.g. solicitor, barrister
- Victims and witnesses service provider
- A representative from the other rehabilitation service providers e.g. education /health
- A member of the judiciary, where appropriate, in an advisory capacity

Effective local forums also include members beyond immediate local CJS partners. Closer working locally is increasingly important as collective budgets have tightened, with collaboration key to increased efficiencies. To reflect this, local forums could include membership from:

- A member from a local victims' panel
- Other rehabilitation service providers, in particular Education and Health
- Legal profession
- Health
- County Council officials
    a. Safety in communities lead
    b. Engagement in communities lead

- Community Safety Partnerships (CSPs)
- A representative from the Parole Board

The Role of the PCC

PCCs will play a leading role in these fora. This will require them to facilitate engagement with all local partners to agree how to engage with nationally-determined programmes and meet local needs. In short, PCCs should use their position to provide leadership and transparency for the CJS at a local level, whilst respecting prosecutorial and judicial independence.

PCCs' specific responsibilities are listed below. Overall, they are responsible for the totality of policing in their area and for commissioning services for victims of crime locally. Under the terms of the Police Reform and Social Responsibility Act 2011, PCCs must:
• secure an efficient and effective police force for their area;
• work with local CJS partners to provide an efficient and effective criminal justice system for the police area;
• appoint the Chief Constable, hold them to account for running the force, and if necessary require them to retire or resign;
• set the police and crime objectives for their area through a police and crime plan;

• set the force budget and determine the precept;
• contribute to the national and international policing capabilities set out by the Home Secretary; and
• bring together community safety and criminal justice partners, to make sure local priorities are joined up.

Role of PCCs and victims

PCCs are responsible for commissioning the majority of local services for victims and are well placed to have oversight of how the CJS locally is meeting the needs of victims.

While there is some good local practice, there needs to be improved reporting, monitoring and transparency on whether victims are receiving the entitlements in the Code of Practice for Victims of Crime (Victims' Code). The Criminal Justice Board has recognised the importance of PCCs' roles locally and signed off a new approach to compliance. At a local level, Police and Crime Commissioners will be responsible for regularly monitoring and identifying issues though local criminal justice partnership arrangements so they can determine effective local intervention. PCCs will provide reports to the Criminal Justice Board and responsible Ministers so they can monitor delivery at a national level and address cross-cutting issues with national service providers. A new compliance framework is being developed in conjunction with the APCC to set out the detail of PCCs' responsibilities, as well the responsibilities of other agencies. The compliance framework will build on the monitoring model that many PCC areas have already put in place.

As the protocol for engaging PCCs in national policy makes clear, PCCs are responsible for communicating information on national developments and Criminal Justice Board and ministerial priorities within their local areas. This will help to ensure priorities are addressed locally, as well as helping to support the implementation of national reforms and policies locally, as agreed with national policy leads.

Setting local priorities and the scope to adapt national plans and innovate

Local CJS partners are responsible for delivering national policies at a local level, both those that come from their own organisations and those agreed by the Criminal Justice Board. The successful delivery of PCC Policing and Crime Plans also requires cross-CJS cooperation, and the priorities set out in these Plans should be taken into account in the priorities agreed by CJS partners in local partnership forums. A local forum is a means by which the delivery of these local priorities can be agreed and delivery of them monitored. Local forums also offer the opportunity to test and review innovative approaches for the delivery of local priorities.

The way in which national CJS departments and agencies have committed to engage with PCCs through the national protocol, means that PCCs will be engaged on major reforms influencing the local context and updated on the implementation of national polices and key reforms. PCCs will also be updated on ministerial and National Criminal Justice Board priorities to enable these priorities to feed into LCJBs.

National platform and best practice

The Association of Police and Crime Commissioners (APCC) is an effective national platform through which PCCs can share best practice from their local area and how LCJBs have worked particularly well. LCJBs also offer the opportunity to share best practice, data, and any future downstream impacts through the system between partners locally.
It is sensible to draw upon and improve existing structures and networks, by using LCJBs to identify local best practice, and encouraging PCCs to feed these into the existing national platform of the APCC, so that CJS partners are not under increased pressures to create such forums and networks.

We recommend that local forums use the APCC network to highlight what approaches have been working well and where there are barriers and tensions, liaising with national policy leads. Local forums may also wish to escalate matters of national importance to the Criminal Justice Board through the PCC representative.

Due to the nature of PCC's role and genuine oversight and interest in many aspects of the CJS, PCCs are able to tap into existing structures and funding to achieve shared outcomes. For example, in at least one LCJB the PCC joined up with health to use existing schemes in place to help rehabilitative measures in the CJS. We strongly encourage all agencies to be more outward facing and to engage with wider agencies in achieving shared outcomes.

Sharing information to identify trends, and manage risks and emerging threats

Sharing information across agencies can help local forums assess what is and isn't working and why, to address shared outcomes of reducing crime and reoffending and to support victims and witnesses.

Local forums should also use their own data and intelligence to identify emerging local trends or patterns in offending behaviour to allow local agencies to plan and adapt to emerging threats. Where local areas collate their own data, this should be shared both between CJS partners in each area, as well as nationally to identify where there is significant progress. Sharing data on local trends may also alert other areas to those trends. In the interests of transparency and accountability, local CJS performance data could also be published.

PCCs are well placed to assist with predicting demand and circulating this among other areas, through representation at the Criminal Justice Board and the APCC network. The APCC provides a forum in which emerging local trends can be reported and national patterns escalated where required, which could enable practical measures to be taken in each part of the CJS to react to demand.

PCC representation at the Criminal Justice Board ensures that PCCs are informed of emerging priorities and trends raised nationally, which they can communicate locally as appropriate.

Next Steps
This protocol will be periodically reviewed by the APCC, working with the Ministry of Justice, to identify emerging examples of good practice and what further action might be needed to support improved local CJS co-ordination.

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Committee(s):	Date(s):
Police Authority Board: for information	16th May 2019
Subject: City of London Police Corporate Communications Strategy update	**Public**
Report of: Commissioner of City of London Police Pol 37-19	**For Information**
Report author: Teresa La Thangue, Communications Director, City of London Police	

Summary

At the February 2018 Police Committee a number of requests were made of the City of London Police Corporate Communications team. Reponses to the requests are contained within this report.

Recommendation

Members are asked to note the report.

Main Report

Background

1. At the February 2018 Police Committee a number of requests were made of the City of London Police Corporate Communications team including the CoLP Communication Strategy and Plan to be submitted to the committee with the request that the Corporate Communications director work in consultation and partnership with the CoL Corporate Communications team on the strategy and that they are consulted on the draft of the report prior to its submission.

2. Additionally, an update on how the opportunity for Members to go out with officers on community engagement patrols to City businesses could best be communicated was requested and lastly information on how to improve communications with Members and the public regarding how the Force and partners respond to incidents of rough sleeping in the City.

Current Position

3. The City of London Police Corporate Communications strategy is updated annually. The current edition is attached as an appendix. It is a high level strategic document designed to guide all corporate communications activity for internal and external audiences. The Force does not produce an overarching communications plan, rather a communications plan is drafted for each event and initiative that requires the support from the Corporate Communications team. These are all devised using the guidance and messaging laid down by the Corporate Communications strategy.

4. The current edition of the strategy was shared with the City of London Corporation Communications Director and aspects of the strategy were developed in partnership, particularly those relating to communicating with City of London Corporation audiences.

5. The matter of communicating how the force responds to incidents of rough sleeping has not been covered in this report. Rough sleeping in an issue where responsibility spans both the City of London Corporation and the City of London Police. It is our understanding a new Sub Committee has been established by the City of London Corporation with rough sleeping within its remit. The Corporate Communications team at the City of London Police will work with this Sub Committee and the responsible corporate communications staff at City of London Corporation to develop a comprehensive communications process to support this work as required.

6. With reference to Members wishing to accompany City of London Police Officers for community engagement or other patrols. It has been agreed with the Town Clerk's Department, Head and Deputy Head of Police Authority Team that a rolling message about this opportunity for Members giving a relevant contact in the Communities Policing Dept, will go out in the regular Police Authority Board Strategic Briefing to all Court of Common Council Members as a reminder of this opportunity.

Conclusion

7. The Board is asked to note the communications strategy attached.

Appendices
City of London Police Communications Strategy

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Internal Communications Strategy 2010-2024

1.0 Introduction

The Internal Communications Strategy exists to support the delivery of the City of London Police corporate plan and Transform, operational priorities, change programme, and Chief Officer Team engagement.

Communication is not something that is done to us, it is a strategic function that requires forward planning and commitment and which every single one of us is able to impact through the way we send emails, hold meetings and share information. We all have a responsibility to seek out the information that we need to do our job and to provide others with the information they need to do theirs.

It is the responsibility of the Internal Communications function to ensure that all employees are equipped to do this to the best of their ability, according to the needs of individual roles and team functions.

Communication as a function is also intrinsically dependent on the support and sponsorship of senior leadership. How they communicate to their teams, what they value and the way they behave sets the tone for the entire force: Proud to deliver an exceptional policing service with Fairness, Integrity, and Professionalism.

2.0 Strategy

2.1 Messaging

All internal messages should focus on:

- The 2019-2020 priorities: Counter Terrorism, Cyber crime, Fraud, Vulnerable people, Roads policing, Public order, Violent and acquisitive crime, Antisocial behaviour
- The three shifts: People growing, empowerment, innovation.
- Our vision: Proud to deliver an exceptional policing service.
- Our values: Integrity, fairness, professionalism.
- The National Police Code of Ethics.
- The Corporate Plan ambitions.

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2.2   Priorities

We have five priorities which drive our activity; these will be measured against an activity metric as per the table below.

Supporting the Corporate Plan and Transform are the most important priorities this year and take precedence over all others.

PRIORITY	INTERNAL COMMS ACTIVITY	ACTIVITY METRIC
1. Support the Corporate Plan and Transform	Drive knowledge and understanding of the Corporate Plan, its ambitions, and the role of Transform in achieving them through the Corporate Plan internal communications plan and the Transform internal communications plan. Show the ambitions in action through appropriate channels.	**Metric 1:** % knowledge, understanding and engagement via internal communications survey **(Bi-annually)** **Metric 2:** No. of Citynet stories and other activities relating to each ambition **(monthly)** **Metric 3:** Citynet analytics **(quarterly)**

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Other priorities of the Internal Communications team are listed below:

PRIORITY	INTERNAL COMMS ACTIVITY	ACTIVITY METRIC
2. Support the force operational priorities	Drive knowledge and understanding of the force priorities, vision, and values as BAU. Show force priorities in action through appropriate channels.	**Metric 1:** % knowledge, understanding and engagement via internal communications survey **(Bi-annually)** **Metric 2:** No. of Citynet stories and other activities relating to each priority **(monthly)** **Metric 3:** Citynet analytics **(quarterly)**
3. Support projects and programmes	Drive knowledge and understanding of the key force projects and programmes and what it means for them/ the force. Develop internal communications plans for the projects and programmes as appropriate.	**Metric 2**: No. of Citynet stories and other activities relating to projects **(monthly)** **Metric 3:** Citynet analytics **(quarterly)** **Metric 4:** Event specific feedback form data **(ad hoc)**

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4. Support Chief Officer Team staff engagement and ad hoc requests	Work with the Chief Officer Team to develop clear and consistent messaging about their role and responsibilities. Use regularly meetings with the COT to review chief officer team engagement opportunities.	**Metric 2:** Number of Citynet stories and other activities relating to Chief Officer Team **(monthly)** **Metric 3:** Citynet analytics **(quarterly)** **Metric 4:** Event specific feedback form data **(ad hoc)**
5. Support staff survey results	Work with Luke Baldock to keep the force informed on the progress of the eight commitments.	**Metric 2:** Number of Citynet stories and other activities relating to staff survey results **(monthly)** **Metric 3:** Citynet analytics **(quarterly)**

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3.0 Channel infrastructure

3.1 Our Channels

CHANNEL	AUDIENCE	FREQUENCY	OBJECTIVE
Citynet	All employees	Ongoing	**Inform** Providing access to news, information and services to officers and staff. Includes news, banners, people stories, blogs, and a ticker for leave notifications.
This Week	All employees	Weekly	**Inform** Providing a succinct round-up of media coverage, internal news, as well as notices of upcoming events and staff/officer special mentions.
Face-to-face events	All employees	Ad hoc	**Engage** Roadshows or drop-in sessions to highlight a particular project or area of work.
Force cascade	All employees	Monthly	**Inform** and **Engage** Force wide cascade on the most important news and events that month.
Table toppers and posters	All employees	Ad hoc	**Inform** Providing staff with key information (e.g. vision, values, etc.) on a longer term basis.
Commissioner's vlog	All employees	Ad hoc	**Inform** A short monthly blog from the commissioner on his priorities each month.

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Commissioner's bulletin	All employees	Quarterly	**Inform** and **Engage** A quarterly email from the Commissioner highlighting important news from across the force.
Screensavers	All employees	Monthly and by exception	**Inform** A screensaver for all desktops and laptops with one key message for the whole force which is simple and easy to understand.
Desktop backgrounds	All employees	Monthly and by exception	**Inform** A key piece of long term information (priorities, vision, values, ambitions, etc), which appear on all desktop backgrounds.
Emails	All employees	Ad hoc	**Inform** In addition to the This Week email and the Commissioner's Bulletin, all force emails can be used to inform staff and officers using various templates including from the Chief Officer Team.
Citynet ticker	All employees	Ad hoc	**Inform** Short-notice, need-to-know eg. Custody closure, leave cancellation, submission of overtime forms.

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3.2 Other force channels

CHANNEL	AUDIENCE	FREQUENCY	OBJECTIVE
Broadcast and notices	All employees	Ad hoc	**Inform** Broadcast officer only related information from other organisation such as the NPCC.
TalkBack	All employees	Ongoing	**Engage** An online open forum for staff and officers to discuss and ask questions on their priorities.
Daily intel briefings	All officers	Daily	**Inform** and **Engage** Operational police messages (including legislation, laws, procedures, etc) should be directed to the Force Intelligence Bureau (FIB) and included in their daily briefings.

3.3 Channel guidelines

Channel	GUIDELINE FOR INCLUSION
Citynet: Latest news	News stories posted on the Citynet home page under **Latest tab** are those which are relevant to a large number of, or all City of London Police officers and staff. These are high level organisational messages about our strategy; operations; the corporate plan; our priorities; three big shifts; vision and values; changes in structure at chief officer level or above; restructure announcements, projects such as the Transform and the Accommodation programme; as well as information from PSD, and that related to police governance. Force-wide related good news and success stories (including convictions and sentencing) will also feature here.

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Citynet: People stories	News/achievements about individuals and teams, including blogs, fundraising, sporting achievements, etc.
Citynet: Events	Calendar of internal and external staff events, including health and wellbeing network events, reminders.
Citynet: Force in pictures	Snapshot of events with one short sentence where a full Citynet story is not required.
Citynet: Banners	Force-wide corporate events, initiatives, and calls to action.
Citynet: Mini site	Information on a force-wide change programme or business process.
Force wide email	Messages which affect all or the majority of the organisation including: messages sent on behalf of the chief officer team; announcements of new appointments at commissioner, assistant commissioner and commander level; emails from the professional standards department; messages that contains staff information in the event of an emergency or attack on the City of London; and details about force-wide events.
Table toppers and posters	Force-wide corporate culture.
Screensavers	TBC
Desktops	TBC
Operational messages	It is not the function of Internal Communications to distribute operational messages. These should be delivered in musters and through the FIB daily intel briefings. In exceptional circumstances Internal Communications can publish via Broadcast, Force cascade, This Week, and very rarely, Citynet. Once officer-only email lists have been created, this will be a useful alternative.

4.0   Audiences

The force's structure creates a range of audience segments. Each of these is a 'customer base' for Internal Communications and the function needs to ensure that it provides for their respective needs.

Audience Group	What do they need to know?	What do they want to say?
Commissioner & Asst. Commissioner	What the force is thinking and feeling.	Strategic vision and progress. Changes to the external landscape and relating these to COLP priorities and achievements.
Chief Officer team	The organisational temperature and how they may be affected by perspectives and activities in other areas of the force.	Key operational decisions. Local achievements and how these relate to the bigger picture.
Senior officers and directors, Programme & project leads	Vision, direction, operational decisions.	Promote their teams' achievements to the rest of the force.
Line Managers	Organisational information to pass on and discuss with their teams.	Provide feedback and issues.
Police Constable/ Specials and support staff	Understand how our strategic priorities translate to operational decisions and tactics, and how they affect their roles.	Raise questions, concerns and have their say, where possible.
City of London Corporation members and staff	News and updates from the force	Promote events and projects affecting CoLP.

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5. Summary

Although this strategy focuses on specific force priorities and upcoming projects, it has been devised in such a way to provide guidance and steer to support all external communications activity within the force. Communications plans will be drafted with consideration of the principles and key messages contained within, ensuring consistency of message across all our communications activity, regardless of audience or channel.

This document will be reviewed and updated annually, in line with the Policing Plan.

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External Communications Strategy 2019-2024

1.0   Introduction

The external communications strategy exists to support delivery of the City of London Police corporate plan, operational priorities and Chief Officer Team engagement with external audiences.

Communication is not something that is done to us, it is a strategic function that requires forward planning and commitment and which every single one of us is able to impact through the way we engage with partners and stakeholders, hold meetings and share information. We all have a responsibility to seek out the information that we need to do our job and to provide others with the information they need to do theirs.

It is the responsibility of the press office and digital communications teams to lead on this activity, engaging with key audiences appropriately and working with colleagues across Directorates to define and promote key messages that support the work of the force.

Communication as a function is also intrinsically dependent on the support and sponsorship of senior leadership. How they communicate internally and externally, what they value and the way they behave sets the tone for the entire force: Proud to deliver an exceptional policing service with Fairness, Integrity and Professionalism at our core.

2.0   Strategy
2.1   Priorities

Whenever possible the following areas will be the primary focus of external communications activity:

- The 2019-2020 force priorities:
    - Counter Terrorism
    - Cyber crime
    - Fraud
    - Vulnerable people
    - Roads policing
    - Public order
    - Violent and acquisitive crime
    - Antisocial behaviour

- The aims and ambitions of the economic crime directorate and the National Lead co-ordinator

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- The Corporate Plan ambitions:
  - To make the City of London the safest city area in the world
  - To deliver a policing service that is valued
  - To be a police force with global influence and impact
  - To build new ethical economic partnerships
  - To have an innovative, skilled and agile workforce in a culture that supports and empowers our people

- Supporting Chief Officer Team engagement with key audiences

Principles

All those in the Communications department who have responsibility for external communications will employ the following principles, with the aim of ensuring our activities have impact with all audiences.

1. Explore and exploit the most effective and appropriate engagement tools and technologies to provide timely, accurate, impactful and value-for-money communications.

2. Support operational activity at both tactical and strategic levels, offering communications advice, counsel, guidance and input.

3. Deploy the business partner model across the organisation, to ensure the force receives appropriate levels of support from the Communications Department, including updates on coverage and effectiveness of activity.

4. Engage with key media and journalists to deliver increased positive coverage of the force with a particular focus on the areas outlined above.

5. Work with key partner agencies to develop communication plans and strategies to support local events and national campaigns which fall within our remit.

The external media team will focus on engaging with relevant and influential journalists and broadcasters to develop productive relationships that result in coverage positioning the force locally, nationally and internationally as an exceptional, relevant and essential police force within the current law

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enforcement landscape. In addition to enhancing the reputation of the force, the Communications Department will support the operational requirements of the Directorates paying particular attention to the above noted priorities.

Approach

Working alongside senior officers and staff (including operational plan owners for each of the corresponding force priorities), the national co-ordinators office for fraud and unit heads within ECD, we will develop and deploy messages via the most appropriate channels to achieve our agreed objectives. All activity will be subject to measurement and evaluation to illustrate ROI, effectiveness of techniques and to inform learning for future activity.

The Communications Department will provide communications plans for each of the force priorities, economic crime aims and other force activity that requires the support of the Communications department. This will be achieved through regular contact with all relevant parties, as well as representation by Communications staff at key meetings, both strategic and tactical, across the force and with the City of London Corporation.

Those responsible for external communications will work with key partners such as the City of London Corporation, to deliver activity that meets the following aims:
- Fully support objectives of policing activity
- Clarity of message
- Impactful delivery method.
- Appropriate audience
- Partnership working (where appropriate)

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2   Key Messages

To ensure consistency of messaging it is essential a set of core key messages is devised and agreed to enable 'one voice' communications with all audiences. These core messages, while not exhaustive, provide the foundation from which all external communications messages will be built:

General over-arching key messages:

- We are proud to deliver an exceptional policing service
- We aim to make the City of London the safest city area in the world
- We lead Policing's fight against fraud nationally

Economic crime key messages

Protecting society

- Fraud is not a victimless crime. The impact of fraud on its victims can be immense:
    - o 'crash for cash' (a form of insurance fraud) has resulted in the death of two innocent victims.
    - o The psychological impact on fraud victims is significant with victims of fraud reporting serious mental health issues for many years after the initial offence.
    - o Financially, fraud victims report businesses being forced into administration and victims becoming reliant on state support.

- Fraud is the most prevalent crime in the UK and presents a significant threat across society. There is much that policing is doing to mitigate the threat but with the National Cyber Security Centre stating 80 per cent of all fraud and cyber crime is preventable, communities across the UK need to be aware of the risks fraud poses and what they need to do to protect themselves.

- City of London Police provides law enforcement with the knowledge and tools needed to support fraud victims, pursue suspects and provide communities with the advice needed to protect themselves from fraud.

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Leading the fight against fraud

- The City of London Police works relentlessly to pursue fraudsters through disruption activity and investigative work and it strives to protect the public and businesses from fraud by using intelligence to help raise awareness of the future threat.

- Action Fraud, as the national reporting centre for fraud and cyber crime, provides national law enforcement with a reporting facility that reduces demand on local forces, representing a saving of £13 million. Having centralised reporting also delivers a national view of the threat, harm and risk created by fraud.

- City of London Police does everything within its power to prevent individuals becoming a victim of fraud. We work with partners across industry to disrupt the phone lines, websites and bank accounts criminals use to commit economic crime.

- With some of the threat from fraud coming from overseas, intervention work with international partners is essential for the effective protection of our communities

Counter Terrorism key messages:

- The City of London Police is working harder than ever to make the Square Mile as safe a place as possible for people to live, work, and visit.
- It is a sad fact that as an area of historical, cultural and economic significance, the City of London will always be a target.
- We use everything at our disposal to tackle these threats, and work closely with other police forces and security services to identify parts of the Square Mile which may be particularly sensitive to any attempt to cause harm.

Vulnerability key messages:

- City of London Police is dedicated to protecting from harm those that are vulnerable.
- We have the right processes and relationships in place to ensure we are supporting victims, not just those who have been at risk, but those who may come to be.
- We are always learning and developing our skills, and constantly teaching our officers the best ways to protect people. All officers and staff have an important role to play in keeping vulnerable people safe.
- The City of London Police is committed to giving all employees the organisational support and instruction they need to protect vulnerable people.

Violent crime key messages:

- We have a zero tolerance to violence in the City of London.
- There are severe consequences for those who engage in violence.
- Crimes of violence are thankfully rare in the City but we are not complacent and will work with partners and businesses to reduce violent crime.

Roads policing key messages:

- Officers conduct regular, targeted enforcement activities against dangerous road users.
- One death is one too many; road fatalities are rare in the City, but we encourage all road users not to be complacent.
- We work closely with our partner organisations to educate and encourage all road users to protect themselves and use the roads safely.

Public order key messages:

- We have the right training, planning and agreements with our partners to ensure our preparedness to safely police upcoming visits, protests, demonstrations and marches.
- We work closely with other organisations, including the Metropolitan Police Service and City of London Corporation, to ensure that we are effecting the right response to emerging trends within the City.

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- We work with partners, businesses, retailers and the community to reduce opportunities for disruption

Acquisitive crime key messages:

- We deploy a range of tactics in the City to reduce theft and we will do everything in our power to bring the people who commit these acts to justice
- There are steps people can take to protect themselves from falling victim to these types of crimes and we would encourage everyone who visits the City to be discreet with their belongings; displaying expensive items, like mobile phones, could attract unwanted attention.
- We would encourage everyone to keep an eye on their belongings at all times when visiting our pubs, bars, cafes and restaurants and never leave their bags or other valuables unattended.

ASB key messages:

- Acts of anti-social behaviour can be dangerous, intimidating to members of the public and can cause disruption to people's daily lives. Most importantly, they are against the law.
- We take any incidents of anti-social behaviour very seriously and will use the powers available to us to put a stop to it.

- We can, and will, authorise community behavioural orders to repeat offenders to ensure our local community feel safe and secure in the City at all times.

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1. Audiences

The City of London Police Communications Department serves a number of distinct external audiences, and the department needs to ensure that it is meeting the specific needs of each. Outlined below are some of the audience groups we engage with most frequently.

Not listed below are the targeted audience groups we will engage for specific campaigns. These audience groups are usually the various communities we need to reach and engage with to achieve the aims of campaigns and can be broad, e.g. everyone nationally at risk on online shopping fraud, or narrow, e.g. residents of the Barbican. Communications plans for specific campaigns identify and define discreet audience groups to enable targeted media engagement and social media planning.

Media outlets
Encompassing local, regional, national, specialist interest and business-to-business (B2B) outlets alongside documentary makers, this is the primary audience for the press office. The role of this audience group is multi-layered, covering scrutiny of the police; how are we performing, where are we failing, what are our plans, as well as campaigns and trends which tell a story and provide key warnings to society. The media's engagement with the force is both reactive and proactive and we will engage with them to broadcast key messages designed to illustrate how we are performing locally and our response to national issues, force priorities, successful cases, crime trends, prevention and awareness messaging as well as general information about the force and what differentiates us.

All engagement with media outlets is conducted within the parameters of the College of Policing's Authorised Professional Practice (APP) on media engagement and press office best practice.

Politicians
Encompassing national and devolved Governments, as well as regional and local politicians, this group is usually reached via media engagement activity, although there are instances when we engage directly with politicians. Some of this activity sits outside the responsibilities of the Communications team covering matters such as responding to MPs letters. The City of London Corporation assists the police with some of the more high-profile political engagement such as select committee attendance. Elected members of

the City of London Corporation are not included in this group due to their role as the oversight authority for the City of London Police.

City of London Corporation
[*Text to come from Bob Roberts*]

Partners
Encompassing trade bodies, third sector and arms-length organisations, along with Governmental departments and bodies, communicating with this wide and diverse group is most effective via direct engagement, although they will also be reached via media activity. Engagement with this group is designed to ensure these important partners are aware of CoLP's work, reach and impact. Engagement will develop, build and strengthen partnerships that ultimately benefit the force while also remaining cognizant of the needs of the partner organisation.

Law Enforcement
Encompassing other UK police forces and national bodies such as the NCA and international entities such as the FBI, engagement with these groups is via a range of channels, including media activity, social media and direct contact, and is mainly for the purpose of disseminating information relating to the CoLP national portfolios and supporting the Corporate Plan aim of being a police force with global impact and influence.

City communities
Covering business, residents, workers and visitors to the City, communication with this extensive group is via a range of channels, including media engagement, social media and the force alerts service. Communicating with this group serves a number of purposes and can range from BAU information to details of specific threats and risks impacting our local communities. This group will also be targeted as part of campaigns activity outlined above.

3 Channels

Traditional media	Print, broadcast, online, local, regional, national, international, B2B, special interest
Objective of engagement	- Inform and educate end audience - Inform and educate journalists about CoLP's roles locally and nationally to enable accurate reporting of complex matters and to maintain our profile in a busy and crowded space

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	• To differentiate and enhance CoLP's brand • Publish deterrence messaging • Publish 4Ps messaging • Support campaigns • Raise profile of initiatives • Raise awareness of threat, harm and risk • Enhance and amplify witness appeals
Applications & Tool-kit	• Press Releases (*proactive*) • Responding to journalist queries (*reactive*) • Media briefing/ Press conference (*proactive/ reactive*) • 121 interviews (*proactive/ reactive*) • Background briefing (*proactive/ reactive*) • Social media (*proactive/ reactive*) • Documentaries (*proactive*)
Advantages & Disadvantages	**Advantages** • Enables targeted engagement with specific audiences • Can lead to broad reach and engagement with millions • Endorsement of messaging by outlet lends weight to CoLP messaging • Opportunity to shape message and enable our side of the story to be heard • End audience (reader, viewer, listener etc) isn't required to 'opt in' to receive CoLP messages • Staffing is the only cost **Disadvantages** • Carries risk of negative commentary, both above and below the line • Labour intensive • Requires specialists media handlers to ensure compliance with best practice, legislation and regulation • Final output reliant on journalist discretion and whether matter is deemed interesting by outlet and journalist • Difficult to accurately measure reach and impact using free tools
Social media	YouTube, Instagram, Twitter, Facebook, podcasts
Objective of engagement	• Immediate communication • Develop conversations with audiences • Inform and educate • To differentiate and enhance CoLP's brand

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	• Publish deterrence messaging • Publish 4Ps messaging • Support campaigns • Raise profile of initiatives • Raise awareness of risk • Appeals • Support and amplify media engagement activity
Application & tool-kit	• Facebook & Twitter for community messaging including video and static content: warn/inform locally & nationally (*proactive /reactive*) • Twitter, Facebook and Instagram to support campaigning activity (*proactive*) • Use Twitter to amplify media engagement *(proactive /reactive)* • Use most appropriate channels to amplify partner messaging (*reactive*) • Podcasts for in-depth view of the force and our work • Twitter/Instagram to direct audience to CoLP websites
Advantages & Disadvantages	**Advantages** • Immediate • Can be less corporate, with informal tone to encourage two-way engagement and accessibility, particularly with young audiences • Can be 'fun' • Individual voices can be developed and promoted to reach particular audiences • Reach can be extensive • Message completely within CoLP's control • Combined with paid-for advertising can be targeted to locales and demographics • Significantly extends reach and engagement for campaigns • Can be measured • Content can be translated into languages other than English **Disadvantages** • Needs audience to 'opt in' and choose to receive content • Risk of inappropriate or unauthorised content causing reputational harm • Can attract cost

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	• Requires compliance with legislation and regulation
Websites	CityofLondon.police.uk; ActionFraud.Police.uk
Objective of engagement	• Immediate communication • Inform and educate • To differentiate and enhance CoLP's brand • Publish deterrence messaging • Publish 4Ps messaging • Support campaigns • Raise profile of initiatives • Raise awareness of threat, harm and risk • Support media engagement activity and appeals • Provide credible and trusted information from source • Comply with statutory obligations • Report crime • Direct to other sources of information • Provide contact details • Maintain transparency
Application & tool-kit	• Useful for hosting video and detailed information that wouldn't be appropriate for social media • Main repository of force information available for public • Main national repository for fraud advice and information • Both sites provide 'one-stop-shop' for crime reporting
Advantages & Disadvantages	**Advantages** • Almost limitless information about CoLP • Can be both corporate and engaging in content and tone • Messaging completely within our control • Immediate • Trusted and credible • Content can be made available to those with accessibility needs • Visitor numbers can be measured **Disadvantages** • Audience needs to seek us out or be directed to site • Annual hosting cost • Needs to be accessible via various devices and adapting the site can be expensive • Needs technical expertise to amend • Amending content can take time • Hosted by external company

Physical materials	Posters, leaflets, z-cards, postcards, magazines
Objective of engagement	• Inform and educate audience • Publish 4Ps messaging • Support campaigns • Raise profile of initiatives • Raise awareness of threat, harm and risk • Direct audience to sources of detailed information such as website • Enable engagement
Application & tool-kit	• Posters for semi-permanent messaging (*proactive/reactive*) • Leaflets for targeted information to specific audience (*proactive/reactive*) • Postcards to redirect audience to online sources of information (*proactive/reactive*) • z-cards for detailed information that needs to be easily accessible (*proactive*) • Magazines for detailed information (*proactive*)
Advantages & Disadvantages	**Advantages** • Useful for face-to-face engagement • Can be targeted for communities not usually online or familiar with social media **Disadvantages** • Expensive • Labour intensive for design, manufacture and distribution • Become out of date quickly • Impossible to measure impact and reach

Community messaging	Everbridge
Objective of engagement	• Inform community of upcoming events • Raise awareness of threat, harm and risk • Direct audience to sources of detailed information such as website
Application & tool-kit	• Quick-time messaging via SMS, email and phone message (*reactive/proactive*)
Advantages & Disadvantages	**Advantages** • Can send messages to all mobile phones within a defined locale during a major incident • Immediate • Trusted • Direct messaging so enables clarity of message

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	• Minimal training required for access
	Disadvantages
	• Expensive to run
	• End audience needs to 'opt in' to receive messages (unless during a major incident)
	• Direct messaging, no room for nuance
	• Limited to simple messaging

4   Measures & Evaluation

The output, approach and channels employed by Corporate Communications team will be measured against the above principles to ensure the team continues to support the force values and priorities. To achieve this, it is essential that we are able to measure the effectiveness of our activity. Campaign evaluations will be used to inform future campaign planning, ensuring lessons are learned and the team continues to develop.

1. Every press release will be measured for the number of page impressions on the website, the amount of coverage generated, including key message penetration, and social media impact. These measures will form part of the departmental Key Performance Indicators (KPI) for Performance Management Group (PMG).

2. Individual communications plans for each force priority supported by external communications will be updated monthly to show activity which has supported each of the force's priorities. This will then be communicated to the appropriate plan owner, and to the monthly Tasking meeting, to help inform decisions in relation to necessary future activity

3. Summaries of successful media coverage, including analysis of social media impact will be circulated to interested staff and officers once a month. Campaign specific analysis will be prepared and made available to appropriate units following completion of each campaign.

4. Digital communications is measured through the digital success score (DSS). Scores are allocated for:
   - number of visitors a press release or campaign webpage receives
   - how many of these visits were a result of a link embedded in social media
   - number of links to other relevant and pertinent data on our sites were contained within a press release or campaign information, i.e. a press release regarding a theft conviction should contain links to pages on how to keep items safe.

5. Summary

Although this strategy focuses on specific force priorities and upcoming projects, it has been devised in such a way to provide guidance and steer to support all external communications activity within the force. Communications plans will be drafted with consideration of the principles and key messages contained within, ensuring consistency of message across all our communications activity, regardless of audience or channel.

This document will be reviewed and updated annually, in line with the Policing Plan.

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Committee	Dated:
Health and Wellbeing Board – **For Decision** Police Authority Board Safer City Partnership Port Health and Environmental Health Committee Community and Children's Services Licensing Committee Policy and Resources Committee	26/04/2019 16/05/2019 20/05/2019 21/05/2019 07/06/2019 16/07/2019 19/09/2019
Subject: Draft Alcohol Strategy 2019-23	**Public**
Report of: Andrew Carter, Director of Community and Children's Services	**For Information**
Report author: Farrah Hart, Consultant in Public Health, Department of Community and Children's Services	

Summary

This report presents the City Corporation's draft Alcohol Strategy 2019-23 for information and comments.

The Alcohol Strategy aims to bring together the work that the City of London Corporation and its partners undertake to reduce alcohol related harm and to provide a framework for future work. This report outlines the main points of the Alcohol Strategy and summarises how it will be delivered and governed.

Recommendations

Members are asked to:

- Note the draft Alcohol Strategy 2019-23 set out in Appendix 1.
- Note the plan for consultation

Main Report

Background

1. The Alcohol Strategy aims to bring together the work that the City of London Corporation and its partners undertake to reduce alcohol related harm and to provide a framework for future work.

2. A key priority of the City of London's Joint Health and Wellbeing Strategy is promoting healthy behaviour amongst City residents and workers, particularly reducing the harm caused by alcohol. Alcohol traditionally plays an important role in the working culture of the City and the City has a thriving night time economy.

3. Different parts of the City of London of London Corporation and the City Police focus on different aspects of alcohol harm, such as education and awareness raising; provision of health services for those with conditions linked to alcohol misuse; treatment for dependent drinkers; licensing of premises that sell alcohol; community safety and alcohol-related crime and disorder. However, to date, there has never been a single strategy that draws together these different aspects and sets out a clear framework for creating a culture of safe, responsible drinking in the City.

4. It is intended that the Corporate Alcohol Strategy consolidates and builds upon an approach that encourages City workers, residents and visitors to safely and responsibly enjoy alcohol, without causing harm to their own health or compromising the safety of others. A great deal of valuable work is already taking place across the City to minimise the health risks associated with alcohol and ensure a safe environment in which people can socialise, although these efforts are not always as coordinated as they should be. It is envisaged that the strategy will create a framework for these activities, so that partners can work together effectively to a set of shared aims and objectives.

Current Position

5. To develop this draft strategy, we engaged with internal and external stakeholders. These included:
    - City of London Corporation departments, including Community and Children's Services (Public Health, Business Healthy, Social Care, Housing, Homelessness), Community Safety, Licensing, Built Environment (Road Danger Reduction), Cleansing, Culture and Heritage, and Corporate HR
    - City of London Police
    - City and Hackney Clinical Commissioning Group
    - Square Mile Health (alcohol treatment and education service provider)

6. The Corporate Strategy and Performance Team were also consulted throughout the drafting process.

Alcohol Strategy 2019 - 2023

7. The commitment is:

    - We commit to informing and educating residents, learners, workers and visitors in the Square Mile about the risks of alcohol misuse, so that they experience alcohol use safely and receive the support they need, when required.

8. The three outcomes that the strategy will deliver on are:
    a. People are informed about the risks of alcohol misuse.
    b. People are safe, and feel safe, in the Night Time Economy.

c. People have the support they need to access services.

9. **Delivery**

This strategy will be supported by a detailed delivery plan with clear and measurable actions and indicators for each outcome.

Next Steps

10. Once approved by the Health and Wellbeing Board, the draft strategy will be subject to a formal period of consultation with City residents, workers and businesses. Two consultation events are currently being planned: one with the resident community; and one with employers.

11. An online survey will be developed, to allow those who cannot attend events to feedback their comments on the strategy.

12. The strategy will go to the following committees for consultation:
    - Safer City Partnership
    - Police Committee
    - Licensing Committee
    - Port Health and Environmental Services Committee
    - Community and Children's Services Committee
    - Policy and Resources Committee

13. The development of the action plan will be overseen by the Department of Community and Children's Services (DCCS). The Health and Wellbeing Board and the Safer City Partnership will receive regular update reports to monitor progress and assess impact.

Corporate Implications

11. The Alcohol Strategy will directly support the achievement of the following outcomes set out the City Corporation's Corporate Plan 2018-23:

    1. People are safe and feel safe

    2. People enjoy good health and wellbeing.

12. This strategy also links to the following City Corporation strategies and policies that support the Corporate Plan:

    - Joint Health and Wellbeing Strategy, 2017-20
    - Safer City Partnership Plan, 2019-21.
    - Responsible Business Strategy, 2018-23
    - Anti-Social Behaviour, 2019-23
    - Statement of Licensing Policy 2017-22.

13. A public sector equality duty test of relevance has been carried out: this strategy has only positive or neutral impacts.

14. This strategy has been signed off as having no security, resourcing, or financial implications for the City of London.

Conclusion

The new draft Alcohol Strategy will, for the first time, provide a framework for partners in the City of London to coordinate efforts to allow City workers, residents and visitors to safely and responsibly enjoy alcohol, without causing harm to their own health or compromising the safety of others.

Appendices

- Appendix 1 – draft Alcohol Strategy 2019- 23

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City of London Corporation: Alcohol Strategy 2019 – 2023

1. Foreword

A foreword to be included from an Elected Member or Senior Officer. This would be included prior to publication of the strategy.

Our commitment - We commit to informing and educating residents, learners, workers and visitors in the Square Mile about the risks of alcohol misuse, so that they experience alcohol use safely and receive the support they need, when required.

Why us? - The City of London Corporation (City Corporation) has a statutory requirement to promote the health and wellbeing of those living and working in the Square Mile. Research shows that the levels of alcohol consumption and alcohol related harm for workers in the Square Mile is significantly higher than the England average. The Square Mile also has a large and growing Night Time Economy, which poses health and safety issues for those who live, learn, work and visit here.

Who we will work with? - We will work in partnership with the City of London Police, the British Transport Police, WDP Square Mile Health, City and Hackney Clinical Commissioning Group and community-based groups within the Square Mile to deliver the actions in this strategy successfully.

Who we will target? - We will target out activities towards our residents, learners, workers and visitors.

Our outcomes		
People are informed about the risks of alcohol misuse. *(Links to CP Outcome 2 - People enjoy good health and wellbeing)*	People are safe, and feel safe, in the Night Time Economy. *(Links to CP Outcome 1 - People are safe and feel safe)*	People have the support they need to access services. *(Links to CP Outcome 2 - People enjoy good health and wellbeing)*
Our activities		
• Identify and support prevention programmes. • Raise awareness about the benefits of lower risk drinking. • Co-produce services and interventions.	• Work with the Licensed Trade sector to effectively regulate the use of alcohol. • Promote alternatives to alcohol led entertainment and socialising offers. • Support our partners to deliver activities to reduce alcohol related harm.	• Raise awareness of the support services available and how to access them. • Join-up services for people with dual diagnosis. • Support the referral of workers and learners in the Square Mile to services in their local area.
How we will deliver this strategy		
A prevention and early intervention approach will be prioritised in all our actions across our identified population groups. By taking a partnership and whole-systems led approach, we will address alcohol related harm and work to ensure that no-one falls through the gaps.		

2. Introduction and context

Purpose

The purpose of this strategy is to bring together the work that the City of London Corporation (City Corporation) and our partners undertake to reduce alcohol related harm and to provide a framework for future work. This strategy outlines our commitment, the outcomes we seek to achieve, the actions we will take and how we will monitor our work. It also supports the achievement of our aim to contribute to a flourishing society, as set out in our Corporate Plan for 2018-23.

Why us?

The City Corporation is the governing body of the Square Mile dedicated to a vibrant and thriving City, supporting a diverse and sustainable London within a globally-successful UK. We have a statutory requirement to promote the health and wellbeing of those living and working in the Square Mile.

Although the Square Mile has a smaller resident population than other London boroughs, with approximately 7,500 residents, it is the workplace for 483,000 workers who also often socialise here after work, or as part of work. Furthermore, the Square Mile attracts a large visitor population, with 18.8 million people visiting in 2016, which has helped to support a growing Night Time Economy in which people visit the Square Mile for its entertainment and leisure opportunities in the evenings and at weekends.

The sale and consumption of alcohol provides opportunities for residents, learners, workers and visitors to relax, socialise, and, in some cases, do business together. As such, the sale and consumption of alcohol contributes to the economy and culture of the Square Mile.

However, the drinking culture of many workers in the Square Mile represents a risk to their short and long-term health, wellbeing and productivity. In 2012, we commissioned an 'Insight into City Drinkers' research piece which found that 47% of workers in the Square Mile drank at increasing or higher risk levels, compared within 24% of the England population. This research also found that 33% of workers in the Square Mile were at an increased risk of alcohol related harm, and that the levels of alcohol consumption and alcohol related harm for workers was significantly higher than the England average[1].

Furthermore, there are health and safety impacts associated with a growing Night Time Economy, in which alcohol is increasingly consumed. The Night Time Economy in the Square Mile, whilst safe for the vast majority, was the location for:

- 1058 assaults between 1 August 2017 and 30 September 2018;
- 111 sexual offences in the same period;
- 906 cases of anti-social and disorderly behaviour in the same period; and,
- 969 alcohol-related call-outs for ambulances between 1 April 2017 and 31 March 2018.

We are already undertaking a lot of work in partnership with the City of London Police to address these impacts. This strategy will provide a blueprint for this work, allowing better and wider partnership working and improved co-ordination of efforts to prevent and address the unwanted impacts of the misuse of alcohol in the Square Mile.

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[1] Morris, J, Annand, F, Southgate, N, & Waker, V, *Insight into City Drinkers*, Alcohol Academy, 2012.

How this strategy was developed
This strategy has been developed by:
- Understanding the current experiences of residents, learners, workers and visitors in relation to alcohol use, including the services they have access to;
- Reviewing best practice approaches, including in local authority alcohol strategies; and,
- Engaging with stakeholders, including a specific steering group, representing the diverse range of people and organisations that live, work or provide services in the Square Mile on this subject. The full list of stakeholders can be found at Appendix 1.

A balanced approach
This strategy takes a balanced approach – we recognise that the majority of those using alcohol do so in a well-informed and moderate way, to enhance their enjoyment of social situations and to provide relaxation from the stresses of modern life. Also, most businesses involved in the sale and supply of alcohol do so in a responsible way that is well regulated. However, a number of people do suffer harm from their own and others' use of alcohol, and so require support to address and overcome this. There are also examples of irresponsible provision of alcohol that will be addressed through this strategy.

A balanced approach means that, we want to:
- Regulate the provision of alcohol effectively where it is being done in an irresponsible manner, without burdening those providing alcohol responsibly;
- Help those that need support for their alcohol use, without penalising those using alcohol responsibly; and,
- Focus on preventing harm before it arises by judicious use of universal and targeted prevention approaches.

Regional and national context
The government Alcohol Strategy for 2012-15 set out proposals to crackdown on 'binge drinking' culture, cut alcohol fuelled violence and disorder, and reduce the number of people drinking to damaging levels. This strategy was not renewed in 2015/16. However, in 2018 the Government announced work was being undertaken on the development of a new Alcohol Strategy, which is likely to be introduced in late 2019.

There is currently no London-wide strategic approach or document on alcohol, although the Mayor's *A Safer City for all Londoners: Police and Crime Plan 2017-22* outlines approaches to improve the safety of Londoners in the Night Time Economy. Additionally, alcohol strategies are in place in a number of London local authorities, including neighbouring local authorities, such as Hackney Council and Southwark Council.

The local context
The Square Mile has a small resident population; the 2011 Census recorded the number of residents living here as roughly 7,500 people. Four residential estates account for the majority of residents, which are the Barbican Estate, Golden Lane Estate, Mansell Street Estate and Middlesex Street Estate. Increasingly, residential accommodations are being developed within other parts of the Square Mile. The Square Mile also has the sixth highest number of rough sleepers in London.

The Square Mile is home to 24,000 businesses, employing over 483,000 people. This means that the Square Mile has the highest daytime population density of any local authority area in the UK. The Square Mile also attracts a large number of visitors and with major transport infrastructure improvements due, including the completion of Crossrail in 2019, these numbers are likely to rise significantly in the coming decade.

The Square Mile reports lower than average levels of alcohol related harm than many of the other London boroughs. The 2016 City of London Health Profile[2] shows that hospital admissions for alcohol related harm are lower than the England average. With 970 ambulance call outs for alcohol related incidents in 2017/18, the Square Mile has lower levels of these than its neighbouring local authority areas[3].

However, there are areas of risk, in particular in relation to City workers. A 2012 commissioned report 'Insight into City Drinkers' found that although nationally around one in four people (24.2%) drink at increasing or higher risk levels, amongst the sample of 740 City workers the figure was closer to one in two (47.6%)[4]. The drinking culture in workplaces in the Square Mile can have an impact on drinking, both through workplace drinking expectations and the availability of alcohol in certain workplace settings – including for example, client entertainment and events.

What we have achieved so far
In partnership with others, we currently commission a full and comprehensive range of services and interventions to address alcohol related harm in the Square Mile. We also undertake a range of activities to promote responsible approaches to alcohol use. We:

- Commission alcohol treatment and prevention services through WDP Square Mile Health and provide clinical services through a partnership arrangement with Hackney Treatment Services.
- Provide key regulatory and enforcement services, including licensing and trading standards, policing the Night Time Economy, tackling anti-social behaviour and providing street cleansing services.
- Engage with businesses and employers through our 'Business Healthy Initiative', and other partnerships, to promote healthy behaviours and to help them, and their staff, reduce alcohol related harm.

Other best practice examples include:
- Keeping people safe and supported in the Night Time Economy – The piloting of an SOS bus in 2018, which assessed and treated those injured or taken ill in the Night Time Economy, reducing the burden on blue light services.
- Health checks referrals pathways – The establishment of pathways between primary care and the WDP Square Mile Health, through which over 40 referrals have been made.
- Effective approaches to managing the licensed sector – The development of a proactive response to reducing alcohol related harms through a licensing partnership providing early warning of emerging issues, the Safety Thirst award programme recognising the work of well managed venues, and improving access to alternatives to alcohol consumption.
- Christmas campaign: The promotion of the 'Eat, Pace, Plan' campaign which encouraged those going out in the Christmas period to be safer and healthier by following the 'three wise things' approach: eating before drinking, pacing your drinks and planning how to get home at the end of the night.
- Working with schools: Building partnerships with school staff through WDP Square Mile Health and Police to ensure that issues relating to alcohol misuse are supported.

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[2] https://www.cityoflondon.gov.uk/services/health-and-wellbeing/Documents/city-of-london-health-profile.pdf
[3] London Ambulance Service data obtained through the SafeStats portal.
[4] Increasing and higher risk drinking levels are determined through scores obtained on the AUDIT alcohol questionnaire tool.

- Christmas partnership working: The provision of a joint bicycle response team by the City of London Police and the London Ambulance Service during peak nights over the Christmas party period, which saved 50 ambulance call outs for alcohol related incidences.
- Operation Luscombe: The development of a partnership hub to provide services for rough sleepers and those begging in the Square Mile, which includes involvement from WDP Square Mile Health to help address alcohol issues for rough sleepers and those begging in the Square Mile.

Priority groups

Based on our evidence, we are targeting this strategy at our residents, learners, workers and visitors, as outlined below. We will also work to identify individuals within these populations that at are most at risks of alcohol misuse and prioritise our work towards them.

- **Our residents** – are one of the smallest priority populations, however they are the key constituency for services commissioned to address alcohol related harms. We have identified younger and older residents as key groups to target our activities towards within this population.

- **Our learners** – are a significant population group that spend time within the Square Mile. The number of schools and tertiary education institutions in the Square Mile means that there are high numbers of learners in the area on any given day. Many older learners are likely to consume alcohol within the Square Mile and visit licensed premises. We also want to prevent harms before they arise, by informing our young learners of the risks of alcohol misuse in the first instance.

- **Our workers** – are the largest population within the Square Mile on a daily basis. Insight work undertaken in 2012 showed that the rates of increasing risk and higher risk drinking is twice the rate amongst City workers than in the wider UK population. Demographic and lifestyle factors amongst workers further exacerbate the risks relating to alcohol use. We will target City workers by engaging with businesses in the Square Mile.

- **Our visitors** – are a significant population, with over 18.8million visiting in 2016. Many visitors come to the Square Mile from Greater London, the UK and internationally for its culture, history, leisure and entertainment. Many visitors come to the Square Mile for its nightlife, particularly the alcohol led Night Time Economy.

- **Rough sleepers** – The Square Mile has the sixth highest population of rough sleepers in the Greater London area. Rough sleepers are particularly at risk of harmful alcohol use and are correspondingly more at risk of harms related to alcohol misuse than the wider population.

3. Our Strategic Approach

Our commitment

We commit to informing and educating residents, learners, workers and visitors in the Square Mile about the risks of alcohol misuse, so that they experience alcohol use safely and receive the support they need, when required.

Our outcomes

We have identified three outcomes that outline the difference we hope to make through this strategy. These outcomes will inform the way we organise and structure our activities in order to achieve our commitment.

Outcome 1	Outcome 2	Outcome 3
People are informed about the risks of alcohol misuse.	People are safe, and feel safe, in the Night Time Economy.	People have the support they need to access services.

We will deliver these outcomes by prioritising a prevention and early intervention approach in all our actions across our identified population groups. We will also take a whole-systems approach, implementing effective partnership working and fostering a culture of communication and knowledge sharing, in order to address alcohol related harm and to ensure no-one falls through the gaps.

Who we will work with
Our key partners for this strategy include the: City of London Police, British Transport Police, WDP Square Mile Health, City and Hackney Clinical Commissioning Group, and Community based groups (such as libraries).

Our wider stakeholders include: Resident groups and organisations, such as the Golden Lane Estate and Barbican Associations and the Ward Clubs; Primary Health Care Providers, such as The Neaman Practice and other General Practices within the City and Hackney CCG boundaries; City businesses; Charitable and Community organisations; Licensed premises; and City Livery Companies.

Internally, various teams will be responsible for embedding this work successfully throughout the organisation. The teams involved in the delivery of this strategy are: Public Health (including Business Healthy), Community Safety, Environmental Health, Trading Standards, Licensing, Street Environment, Economic Development Office, Corporate Strategy and Performance, Culture and Tourism, and the Estates Team.

Together, we will work together to deliver this strategy successfully. The delivery of this work will be overseen by an Alcohol Partnership Group.

What we will do
This strategy will develop further the good work that we have already delivered in relation to alcohol misuse and harms.

The key actions that we will prioritise for each outcome are as follows:

Outcome 1 – People are informed about the risks of alcohol misuse
We will:
- Deliver prevention work with students in schools, including independent schools, within the boundaries of the Square Mile.
- Identify and support prevention projects aimed at families and young people that highlight alcohol related harm and hidden harm caused by alcohol issues.
- Engage more extensively with charitable and community groups to support prevention work relating to alcohol misuse and harms amongst young people.
- Inform and raise awareness amongst residents, learners, workers and visitors about the risks of alcohol misuse and the benefits of lower risk drinking – both through new and existing avenues.
- Encourage businesses to consider non-alcohol led settings for business meetings and client entertainment (addressing the 'Coffee house effect'), through our Business Healthy Network.
- Work with residents and Healthwatch to co-produce services that raise awareness of alcohol misuse and support the needs of residents.

- Empower City workers to support and inform their colleagues about the risks and harms related to alcohol misuse, through our Business Healthy network.
- Empower and support learning institutions to raise awareness and inform their learners about the risks and harms related to alcohol misuse.

Outcome 2 – People are safe, and feel safe, in the Night Time Economy
We will:
- Work with a range of partners to identify, provide and promote non-alcohol led forms of entertainment and socialising, such as championing the broad cultural offer and active leisure opportunities in the Square Mile.
- Ensure that the regulation and enforcement of the licensed trade is effective and targeted, using the Licensing Team's Traffic Light Scheme to prioritise and target action.
- Support the City of London Police and the British Transport Police to deliver their activities to reduce alcohol related harm in the Night Time Economy.
- Deliver campaigns, such as the Christmas 'Eat, Pace, Plan' campaign, to encourage safe and healthy drinking behaviour in the Night Time Economy.
- Maintain and strengthen the partnerships between the City Corporation, the City of London Police and the licensed trade sector in the Square Mile.

Outcome 3 – People have the support they need to access services.
We will:
- Support effective interventions and services, such as the Mobile Alcohol Intervention Unit.
- Maintain and support pathways between primary care and alcohol treatment services, to ensure they are working well and meeting the needs of people seeking support for their alcohol use issues.
- Promote and raise awareness amongst residents of the support services that are available and how to access them.
- Join up services linked to mental health provision to ensure best care for residents with dual diagnosis.
- Identify issues of isolation, particularly for elderly residents, and build these issues into pathways and service user engagement approaches.
- Work with our commissioned services to ensure workers and learners in the Square Mile with alcohol issues are referred to services in their home boroughs.
- Foster joint working with homelessness organisations to ensure that the alcohol support needs of rough sleepers in the Square Mile are met and to support rough sleepers to engage with the appropriate services.

4. Alignment and governance

Corporate Plan 2018-23 links
This strategy supports the following aim and outcomes in our Corporate Plan:

Aim: To contribute to a flourishing society.
- **Outcome 1** – People are safe and feel safe.
  - *Tackle terrorism, violent and acquisitive crime, fraud, cyber-crime and anti-social behaviour and facilitate justice.*
  - *Protect consumers and users of buildings, streets and public spaces.*
  - *Educate and reassure people about safety.*

- **Outcome 2** – People enjoy good health and wellbeing.
  - *Raise awareness of factors affecting mental and physical health.*

    o *Provide advice and signposting to activities and services.*

Alignment to other City Corporation strategies and policies

This strategy also links to the following City Corporation strategies and policies that support the Corporate Plan:

- **Joint Health and Wellbeing Strategy, 2017-20** – The Alcohol Strategy aligns with Priority 1: Good Mental Health for all, and Priority 5: Promoting Healthy Behaviours of the Joint Health and Wellbeing Strategy.

- **Safer City Partnership Plan, 2019-21** – The Alcohol Strategy aligns with Outcome 4: Anti-Social Behaviour is tackled and responded to effectively, and Outcome 5: People are safe and feel safe in the Night Time Economy.

- **Responsible Business Strategy, 2018-23** – The Alcohol Strategy aligns with Outcome 1: Individuals and communities flourishing, by supporting Priority 1: People's wellbeing.

- **Anti-Social Behaviour, 2019-23** – The Alcohol Strategy aligns with the ASB Strategy's vision of the City of London being a safe place to live, study, work or visit by effectively tackling anti-social behaviour.

- **Statement of Licensing Policy 2017-22** – The Alcohol Strategy aligns with key aspects and the overall direction of the Licensing Policy. The Licensing Policy is the key document outlining the City Corporation's approach to managing the Licensed Sector within the Square Mile and therefore feeds directly into each of the priority outcomes of this strategy.

Governance and responsibilities

The Public Health Team, with support from the Alcohol Partnership Group, will take responsibility for the management and oversight of the Alcohol Strategy. The strategy will be reported and monitored through the following governance structures:

- **Board level** – The Health and Wellbeing Board (HWB) and the Safer City Partnership (SCP) will provide the Board level oversight and responsibility for the Alcohol Strategy. An annual report will be provided to the HWB and SCP, highlighting the progress against the outcomes.

- **Committees** – The Licensing Committee and Licensing Sub Committee will be updated as needed on the progress of the strategy.

- **Officer level** – An Alcohol Partnership Group will provide the focal point for the day to day oversight of the Alcohol Strategy, led by the Public Health Team. The group will be responsible for overseeing the delivery and performance of the strategy, and for reporting to the HWB and SCP.

- **Linked Officer level groups** – The Health and Wellbeing Advisory Group, the Safer City Officers Group and the Licensing Responsible Authorities Group will also have an interest in the work under the Alcohol Strategy, and all efforts will be made to ensure links across these groups.

5. Monitoring and evaluation

Measures of success

A set of key performance indicators will be developed in the action plan for this strategy. The high-level measures of success for this strategy are:

- A healthier drinking culture amongst the residents, learners, workers and visitors in the Square Mile.
- Workplaces adopt and encourage healthier drinking cultures.
- An even safer Night Time Economy.
- Alcohol misuse and harm support is accessed easily and promptly by those that need it.
- Better provision of alternative entertainment and leisure activities that are not alcohol-led.

Monitoring

Monitoring of the strategy will take place regularly through the Alcohol Partnership Group and linked officer groups and will be based on the key performance indicators and monitoring framework set out in the action plan.

Evaluation

The Alcohol Partnership Group will provide an annual report to the Board level groups overseeing this strategy, evaluating the impact of the strategy against the outcome priority areas and indicators.

The Alcohol Partnership Group will also look for opportunities to commission, align with, or support any evaluation activities in the City Corporation that align with this strategy.

6. Appendix 1 – List of stakeholders engaged in the development of the strategy

City of London Officers
Consultant in Public Health, City of London Corporation
Business Healthy Lead, City of London Corporation
Assistant Director, Public Protection.
Corporate Strategy Officer
Corporate Strategy Manager
Cultural and Visitor Development Director
HR Health and Safety Manager
Head of Community Safety
Heart of the City Director

City of London Committees
Health and Wellbeing Board
Community and Children's Services Committee
Licensing Committee
Police Committee
Safer City Partnership
Policy and Resources Committee

Other meetings and workshops
Integrated Commissioning Prevention Workstream

Other partners
Mental Health Clinical Lead, City and Hackney Clinical Commissioning Group
Consultant in Public Health, City and Hackney Public Health Team
Executive Director, City of London Healthwatch
Service Manager and Safeguarding Lead, WDP Square Mile Health
Risk Manager, Lloyds of London
Chief Inspector, Communities & Partnerships and Mounted Branch, City of London Police

This list will be expanded once all stakeholder engagement has been completed, including the workshop, authorisation process and consultation.

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