



Performance and Resource Management Committee of the Police Authority Board

Date: FRIDAY, 15 NOVEMBER 2019

Time: 10.30 am

Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members: Deputy James Thomson (Chairman)
Douglas Barrow (Ex-Officio Member)
Nicholas Bensted-Smith
Deputy Keith Bottomley
Tijs Broeke
Andrew Lentin
Kenneth Ludlam (External Member)
Caroline Mawhood (External Member)
Deborah Oliver

Enquiries: Alistair MacLellan
alistair.maclellan@cityoflondon.gov.uk

Lunch will be served in the Guildhall Club at 1pm.

N.B. part of this meeting may be subject to audio-visual recording.

**John Barradell
Town Clerk and Chief Executive**

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **APPOINTMENT OF CO-OPTED MEMBER**
The Chairman to be heard.

For Decision
4. **MINUTES**
To agree the public minutes and summary of the meeting held on 21 June 2019.

For Decision
(Pages 1 - 8)
5. **PUBLIC REFERENCES**
Report of the Town Clerk.

For Information
(Pages 9 - 12)
 - a) **14/2019/P - Updated Terms of Reference** (Pages 13 - 14)
Report of the Town Clerk.
6. **BUDGET MONITORING MONTH Q2 2019/20**
Report of the Commissioner – TO FOLLOW.

For Information
7. **INTERNAL AUDIT UPDATE REPORT**
Report of the Head of Audit and Risk Management.

For Information
(Pages 15 - 40)
8. **HMICFRS INSPECTION UPDATE**
Report of the Commissioner.

For Information
(Pages 41 - 88)

9. **POLICING PLAN 2019-20 - PERFORMANCE AGAINST MEASURES FOR END Q2**
Report of the Commissioner.
- For Information**
(Pages 89 - 138)
10. **HUMAN RESOURCES MONITORING INFORMATION 1 APRIL 2019 - 30 SEPTEMBER 2019**
Report of the Commissioner.
- For Information**
(Pages 139 - 158)
11. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
12. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
13. **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 the Schedule 12A of the Local Government Act.

For Decision

Part 2 - Non-Public Agenda

14. **NON-PUBLIC MINUTES**
To agree the non-public minutes of the meeting held on 21 June 2019.
- For Decision**
(Pages 159 - 162)
15. **NON-PUBLIC REFERENCES**
Report of the Town Clerk.
- For Information**
(Pages 163 - 164)
16. **CITY OF LONDON POLICE MEDIUM-TERM FINANCIAL PLAN UPDATE**
Report of the Treasurer – TO FOLLOW.
- For Information**
17. **GATEWAY 6 - ACTION & KNOW FRAUD**
Report of the Commissioner.
- For Information**
(Pages 165 - 180)

18. **TRANSFORM PROGRAMME: UPDATE ON THE DEVELOPMENT OF COLP'S TARGET OPERATING MODEL (TOM)**
Report of the Commissioner.

For Information
(Pages 181 - 218)

19. **CORPORATE WIDE REVIEW**

For Information

- a) **Fleet Street Estate Programme Audit - Final Report** (Pages 219 - 248)
Report of the Head of Audit and Risk Management.
- b) **City of London Police Accommodation Programme Audit - Final Report**
(Pages 249 - 282)
Report of the Head of Audit and Risk Management.

20. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

21. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB-COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

**PERFORMANCE AND RESOURCE MANAGEMENT COMMITTEE OF THE
POLICE AUTHORITY BOARD
Friday, 21 June 2019**

Minutes of the meeting of the Performance and Resource Management Committee
of the Police Authority Board held at Committee Rooms, 2nd Floor, West Wing,
Guildhall on Friday, 21 June 2019 at 10.30 am

Present

Members:

Deputy James Thomson (Chairman)
Douglas Barrow (Ex-Officio Member)
Nicholas Bensted-Smith
Tijs Broeke
Kenneth Ludlam (External Member)
Caroline Mawhood (External Member)

City of London Police Authority:

Simon Latham	- Deputy Chief Executive
Oliver Bolton	- Deputy Head of Police Authority Team
Alistair MacLellan	- Town Clerk's Department
Tom Coniffe	- Town Clerk's Department
Caroline Al-Beyerty	- Deputy Treasurer
Alistair Cook	- Head of Police Authority Finance
Jeremy Mullins	- Chamberlain's Department – Internal Audit
Pat Stothard	- Chamberlain's Department – Internal Audit
Sean Green	- Chamberlain's Department – Information Technology
Kevin Mulcahy	- Chamberlain's Department – Information Technology

City of London Police Force:

Alistair Sutherland	- Assistant Commissioner
Oliver Shaw	- Detective Superintendent
Hector McKoy	- Chief Inspector I&I
Carl Tomlinson	- Financial Services Director
Stuart Phoenix	- Head of Strategic Development
Paul Adams	- Head of Governance & Risk
Julia Perera	- Human Resources Director
Hayley Williams	- City of London Police

1. APOLOGIES

Apologies were received from Deputy Keith Bottomley, Andrew Lentin and Deborah Oliver.

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

There were no declarations.

3. **TERMS OF REFERENCE**

Members considered the terms of reference of the Committee and the following points were made.

- In response to a comment from a Member, the wider Committee agreed that the terms of reference would benefit from some amendments to reflect the Committee's role in scrutinising the Force's response to HMICFRS inspections, and oversight of Force financial management controls. The Town Clerk noted that any amendments would be put to the Police Authority Board for approval (**14/2019/P**).
- Members agreed that the co-opted vacancy on the Committee should be advertised to the wider Court of Common Council (**15/2019/P**).

RESOLVED, that the terms of reference be received.

4. **MINUTES**

Members considered the public minutes and non-public summary of the meeting held on 26 April 2019. Members agreed that the section referencing 11/2019/P should be amended to reflect the fact that the Force had mapped its values against those held by the City of London Corporation, and that the reference be closed.

RESOLVED, that, subject to the comments made, the public minutes and non-public summary of the meeting held on 26 April 2019 be approved as a correct record.

5. **REFERENCES**

Members considered a joint report of the Town Clerk and Commissioner regarding public outstanding references from previous meetings and the following points were made.

15/2018/P – FOI Requests

- The Chairman noted that the backlog of detailed responses had been cleared and therefore this reference could be closed.

RESOLVED, that the report be received.

6. **INTERNAL AUDIT UPDATE REPORT**

Members considered an update report of the Head of Audit and Risk Management regarding Internal Audit and the following points were made.

- The Chairman noted that the live Red rated recommendation regarding Key Financial Controls 2018/19 had been dealt with and queried what

progress had been made on the Red rated audit issues regarding Police Bank Accounts 2017/18.

- In reply, the Assistant Commissioner noted that local level Force meetings were held every Monday morning, with fortnightly meetings between the Commissioner and Chamberlain. A Strategic Finance Board had also been convened, which had not existed previously.
- In response to a comment that the Schedule of Internal Audit Projects 2018/19 gave Members little appreciation of what progress had been made to date, the Head of Internal Audit commented that this was partly due to internal audit fieldwork not commencing until Quarter 4 2018/19. The Head of Internal Audit noted that this would not prove an issue for 2019/20.
- In response to a question, the Head of Internal Audit replied that feedback would be provided to the Force over the next week, with a deadline for management responses of a fortnight.
- In response to concerns raised by a Member that there was no deadline – even provisional – for resolution of Key Financial Control issues, the Deputy Chamberlain noted that these would be resolved by November 2019 (**16/2019/P**).
- Members agreed that, in light of delays in implementing audit responses in the previous year, an interim update on progress being made should be provided to Members prior to or during the August 2019 recess (**17/2019/P**).
- In response to a comment from a Member, the Head of Internal Audit noted that he had received assurances from the Force that the Amber recommendations regarding Police Seized Goods were being addressed and that he was due to discuss those recommendations in detail with Force representatives.

RESOLVED, that the report be received.

7. REVENUE AND CAPITAL BUDGET OUTTURN REPORT 2018/19

Members considered a report of the Commissioner regarding Revenue and Capital Budget Outturn 2018/19 and the following points were made.

- The Chairman welcomed the delivery of £3.1m of in-year savings and noted that he would welcome changes to future report formats to ensure a greater granularity of detail for Members (**18/2019/P**).
- In response to a question from a Member regarding how sustainable a freeze on recruitment was, the Assistant Commissioner noted that the freeze on Force staff recruitment had been relaxed, and that the freeze was due in part to the Transform programme.

- In response to a question, the Assistant Commissioner noted that the Force was working through a new recharging model for the Economic Crime Directorate.
- In response to a question, the Assistant Commissioner confirmed that there were some discrepancies in the reported £1.2m overspend that were due to the drive to achieve strategic policing obligations.
- In response to a comment from a Member, the Chairman noted that a report regarding Ethical Partnerships was being prepared for submission to the Police Authority Board meeting on 11 July 2019.
- In response to a question, the Financial Services Director committed to providing a response regarding the write off of aged debt outside of the meeting (**19/2019/P**).

RESOLVED, that the report be received.

8. BUDGET MONITORING MONTH 2 - 2019/20

Members considered a report of the Commissioner of Police regarding Budget Monitoring for Month 2 – 2019/20 and the following points were made.

- The Financial Services Director noted the additional £2m pressure on budgets due to pension contributions.
- A Member noted that 81 posts were being held vacant and noted his belief that a proactive plan was required to ensure policing services were adequately maintained.
- In response to a question, the Financial Services Director noted that the current budget was for the existing Force establishment i.e. it did not include the 67 additional posts recently requested by the Force, the funding for which was outside the current budget.
- The Assistant Commissioner clarified that the additional 67 posts would be funded from Proceeds of Crime Act (POCA) proceeds during Year 1, and an increase in the Business Rate Premium thereafter.
- The Treasurer noted that a revised budget should be prepared that included the additional 67 posts.
- In response to a question regarding longer term strategic funding for the City of London Police, the Chairman noted that this issue would be within the remit of the Resource Allocation Sub (Policy and Resources) Committee.
- The Deputy Treasurer commented that, with the adoption of the Fundamental Review by the Authority, in addition to Transform there were now two transformation programmes affecting the Force running

alongside one another. It would be necessary for the Force to make a judgement on what posts it was able to afford.

- The Deputy Chief Executive noted that the use of POCA proceeds was appropriate in light of the Fundamental Review but added that longer term funding would be subject to a decision to be made later in 2019.
- In response to a request from a Member, the Financial Services Director agreed to submit a revised budget to the Committee at its next meeting **(20/2019/P)**.
- The Chairman commented that figures within the report e.g. Directorate Breakdown would require commentary in future reporting **(21/2019/P)**.

RESOLVED, that the report be received.

9. HMICFRS INSPECTION UPDATE

Members considered an update report of the Commissioner regarding Her Majesty's Inspectorate of Constabulary, Fire & Rescue Services Inspection and the following points were made.

- The Assistant Commissioner noted that a further three inspections had been conducted since the last meeting of the Committee. 63 recommendations arising from the HMICFRS Inspection would be reviewed and ultimately closed.
- The Chairman welcomed the progress made on addressing legacy issues and queried the new Red status regarding *HMCPSP* and *HMICFRS National Report – Living in Fear (July 2017)* to which the Assistant Commissioner replied that this was a new, national, recommendation that would be reviewed by the Force.
- The Chairman of the Police Authority Board noted that he had met with the Force's HMICFRS Inspector who had noted he was content with the level of progress being made by the Force.

RESOLVED, that the report be received.

10. PERFORMANCE AGAINST MEASURES END OF YEAR 2018-19 FOR THE POLICING PLAN 2018-20

Members considered a report of the Commissioner regarding performance against measures end of year 2018/19 for the Policing Plan 2018-20 and the following points were made.

- The Assistant Commissioner noted that there was a rise in recorded crime with an extra 3.7 crimes committed per day. This reflected in part better recording techniques but also a real term increase in violent crime.
- The Assistant Commissioner added that at the time of going to print, data had not been available for Measure 10 (level of victim satisfaction

with the service provided by the City of London Police) due to GDPR but that this issue had now been resolved.

- In response to a comment from a Member, the Assistant Commissioner noted that the Force was among the top six forces rated for integrity of crime according to the National Crime Recording Standard.
- In response to a question, the Chairman noted that increase in crime associated with the Night Time Economy (NTE) could be addressed at least in part by the Night Time Levy (NTL). The Assistant Commissioner added that the NTL brought in £330,000 in the City of London, although it would be appropriate to review the formula used to allocate those monies in light of NTE crime and disorder becoming a larger issue.
- In response to a question, the Assistant Commissioner agreed to provide more detail on the use of the SOS Bus from Essex to Members outside of the meeting (**22/2019/P**).
- A Member commented that a recorded positive outcome did not equate to a prosecution.

RESOLVED, that the report be received.

11. HUMAN RESOURCES MONITORING INFORMATION 1ST OCTOBER 2018 - 31ST MARCH 2019

Members considered a report of the Commissioner regarding Human Resources Monitoring Information for the period 1 October 2018 – 31 March 2019 and the following points were made.

- In response to a question, the Force Human Resources Director noted that the high number of leavers from the Force compared against national counterparts was largely due to a high number of retirements that reflected the Force's older age profile.
- In response to a question, the Force Human Resources Director confirmed that the exit interview process referenced within the report included a face-to-face session.

RESOLVED, that the report be received.

12. BAME DRAFT ACTION PLAN 2019-2025

Members considered a report of the Commissioner regarding the BAME Draft Action Plan 2019-2025 and the following points were made.

- The Assistant Commissioner acknowledged that there had been some delay in providing this report to Members given the reference requiring the report dated from November 2018. The Assistant Commissioner added that some Staff Network feedback was still required on the Action Plan.

- In response to a question, the Chief Inspector I&I noted that the main barrier facing implementation of the action plan was cost and confirmed that he was confident of buy-in to the plan from across the whole Force. He concluded by noting the National Black Police Association had been consulted during the drafting of the plan.

RESOLVED, that the report be received.

13. COMMUNITY SURVEY RESULTS 2018/19

Members considered a report of the Commissioner regarding Community Survey Results 2018/19 and the following points were made.

- A Member welcomed the evidence of increased community participation outlined within the report.

RESOLVED, that the report be received.

14. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

There were no questions.

15. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There was no other business.

16. 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 that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

17. NON-PUBLIC MINUTES

RESOLVED, that the non-public minutes of the meeting held on 6 February 2019 be approved as a correct record.

18. NON-PUBLIC REFERENCES

Members considered a joint report of the Town Clerk and Commissioner regarding non-public outstanding references.

19. TRANSFORM PROGRAMME: UPDATED ESTIMATE OF CASH RELEASING BENEFITS (CRBS) AND ENHANCED INCOME GENERATION

Members considered a report of the Commissioner regarding the Transform Programme: Updated Estimate of Cash Releasing Benefits (CRBs) and Enhanced Income Generation.

20. WORKFORCE PLAN 2018-2023- REFRESH

Members considered a report of the Commissioner regarding the Workforce Plan 2018-2023 Refresh.

21. NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

There were no non-public questions.

22. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB-COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

There was one item of urgent business and one late paper.

22.1 2020 IT Services Programme - Preparation of Tender

Members considered a report of the Chamberlain regarding the 2020 IT Services Programme – Preparation of Tender.

The meeting ended at 12.29 pm

Chairman

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

PEFORMANCE AND RESOURCE MANAGEMENT COMMITTEE

OUTSTANDING REFERENCES

No.	Meeting Date & Reference	Action	Owner	Status
23/2018/P	23/11/18 Item 7- Internal Audit Update Report Appendix – Format of Schedule of “live” recommendations	In response to comments from Members, the Head of Audit and Risk Management agreed that the format and descriptors used for current internal audit reporting could be amended to enable Members to provide more effective scrutiny.	Chamberlain (Internal Audit)	COMPLETE Details of recommendation implementation for three financial years have been provided to date. Now report focuses on the “live recommendations”.
5/2019/P	6 February 2019 Item 5 – Revenue Budget Monitoring to December 2018	Next and future revenue reporting to include analysis of security of income.	Commissioner of Police	COMPLETE An analysis of security of income is now included in the Budget Monitoring reports.
8/2019/P	6 February 2019 Item 7 – HIMCFRS Inspection Update	Chairman of Police Authority Board to raise pace and frequency of HMICFRS inspections at next HMIC meeting	Town Clerk/ Head of Police Authority	UPDATE AT THE NOVEMBER 2019 MEETING
13/2019/P	6 February 2019 Item 10 – AOB – Internal Audit Update	Internal Audit to be conducted on budget mitigation measures undertaken by the Force.	Internal Audit	IN PROGRESS Key financial controls audit recommendation implementation being monitored. Further audits of Police Transformation Project and

PEFORMANCE AND RESOURCE MANAGEMENT COMMITTEE

OUTSTANDING REFERENCES

				Police Funding included within the 2019-20 Internal Audit Plan.
14/2019/P	21 June 2019 Item 3 – Terms of Reference	Terms of reference to be amended to reflect Committee's role on scrutinising Force response to HMICFRS inspections and oversight of Force financial management controls.	Town Clerk	COMPLETE Minutes of the Committee's discussion were submitted to the July 2019 Police Authority Board meeting and the amended terms of reference are included on the agenda.
15/2019/P	21 June 2019 Item 3 – Terms of Reference	Co-Opted vacancy to be advertised to Court of Common Council	Town Clerk	COMPLETE Vacancy advertised to Court of Common Council by email on 18 October 2019 at 3.59pm. Members will be required to appoint the successful candidate at their 15 November 2019 meeting.
16/2019/P	21 June 2019 Item 6 – Internal Audit Update Report	Financial Control issues to be resolved by November 2019	Deputy Chamberlain	UPDATE AT THE NOVEMBER 2019 MEETING
17/2019/P	21 June 2019 Item 6 – Internal Audit Update Report	Interim update on progress on resolving internal audit issues to be provided to Members during August 2019 recess	Internal Audit	RESOLVED Issues addressed in Internal Update report provided at November 2019 meeting.
18/2019/P	21 June 2019 Item 7 – Revenue and Capital Budget Outturn 2018/19	Future report format to provide greater granularity for Members	Chief Operating and Chief Financial Officer	IN PROGRESS Next Outturn report due July 2020 . Projected outturn is included in Budget Monitoring reports.

PEFORMANCE AND RESOURCE MANAGEMENT COMMITTEE

OUTSTANDING REFERENCES

19/2019/P	21 June 2019 Item 7 – Revenue and Capital Budget Outturn 2018/19	Short briefing on write-off of aged debt to be circulated outside of the meeting	Financial Services Director	COMPLETE Update on position with regard to aged debt is included in the Q2 Budget Monitoring report on the agenda
20/2019/P	21 June 2019 Item 8 – Budget Monitoring Month 2 2019/20	Revised budget to be submitted to November 2019 meeting	Chief Operating and Chief Financial Officer	COMPLETE Update on budget position is in the Q2 Budget Monitoring Report
21/2019/P	21 June 2019 Item 8 – Budget Monitoring Month 2 2019/20	Future budget monitoring reporting to include more commentary	Chief Operating and Chief Financial Officer	COMPLETE All feedback has been addressed in the Q2 Budget Monitoring report
22/2019/P	21 June 2019 Item 10 – Performance against measures end of year 2018/19 against Policing Plan 2018-20	Members to be briefed on use of SOS Bus from Essex outside of the meeting	Assistant Commissioner	COMPLETE -Update November 2019- A briefing note was sent to the Town Clerk on 28 th October to circulate to Members of this Committee which was completed on Friday 1 st November 2019.

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Performance and Resource Management Committee of the Police Authority 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;
- 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;*
- e. monitoring the Force's response to HMICFRS inspections and any recommendations arising from those inspections;*
- f. monitoring financial management controls used by the Force, and*
- g. any other matter referred to it by the Police Authority Board.*

Membership 2019/20

Deputy James Thomson (Chairman)

Doug Barrow (Ex-Officio)

Tijs Broeke

Nick Bensted-Smith

Deputy Keith Bottomley

Andrew Lentin

Deborah Oliver

Kenneth Ludlam (Audit and Risk Management Committee Co-Opted Member)

Caroline Mawhood (Audit and Risk Management Committee Co-Opted Member)

Vacancy – Co-Opted Member

Frequency of Meetings
Quarterly

Committee: Police Performance and Resource Management Committee- for information Police Authority Board- For information	Date: 15 th November 2019 28 th November 2019
Subject: Budget Monitoring Month Q2 2019/20	Public
Report of: Commissioner of Police Pol 86-19	For Information
Report author: Cecilie Booth, Chief Operating and Chief Financial Officer	

Summary

The Chief Officer Cash Limited budget at the start of the year was £72.7m. The budget increased in Q1 to £73.4m following the transfer of 15 City of London Corporation (CoL) staff and associated budget to the Joint Contact Centre. Budgets will be further adjusted in the second part of the financial year to reflect the 67 growth bid posts in line with expected on boarding.

This report outlines the financial position for the second quarter of the 2019/20 financial year. Current projections indicate an overspend of £2.2m by the end of the year, primarily due to an unfunded increase in Police Officer pension contributions in the region of £2.5m based on full establishment. Current workforce levels indicate pressure of £2.3m this year. It is anticipated that this pressure can be partly off-set by a residual balance in the POCA reserve due to the timing of recruiting to the 67 new posts. At this stage of the financial year it is expected that only £1m of the POCA reserve will be spent.

There are additional budget pressures on overtime, a larger pay award for Officers than expected and legal costs in relation to the London Bridge inquest. Savings of £6.3m are built into the budget, with £4.7m in pay and £1.6m in non-pay. Maintaining acceptable service levels whilst holding the required level of vacant posts as part of agreed pay mitigation continues to be a challenge. Ongoing management of the vacancy factor, maximising income opportunities and managing non-essential spend continue in order to bring the position back within budget by the end of the year.

Recommendation

Members are asked to note the report.

1 Chief Officer Cash Limit Budget

1.1 The Chief Officer Cash limited budget at the start of the year was £72.7m. This has now increased to £73.4m due to the transfer of the Joint Contact Centre staff. This is funded as follows:

Table 1

Funding Type	Amount (£000)
Core Grant (inc NICC)	57,100
Business Rates Premium	13,000
Precept grant	2,700
CoL Contact Centre	680
Total Funding	73,480

1.2 The latest forecast position is summarised below.

Table 2

	19/20 Latest Budget £m	Budget YTD £m	Actual (Q2 YTD) £m	Variance YTD £m	Forecast £m	Projected Variance £m
Pay						
Officers – net	49.7	24.9	25.2	0.4	49.8	0.1
Staff – net	24.9	12.5	11.4	(1.1)	23.0	(1.9)
Overtime	2.0	1.0	1.1	0.1	3.1	1.1
Agency	2.4	1.2	0.9	(0.3)	2.1	(0.3)
Indirect employee costs	2.2	1.1	0.5	(0.6)	1.7	(0.5)
Pensions Contrib.	20.4	10.2	0.0	(10.2)	20.4	0.0
Total Pay	101.7	50.9	39.1	(11.8)	100.2	(1.5)
Non-Pay	39.7	19.9	22.5	2.7	42.0	2.3
Total Expenditure	141.4	70.7	61.6	(9.1)	142.3	0.8
Income						

Specific Grant	(52.2)	(26.1)	(21.7)	4.4	(50.4)	1.8
Partnership	(12.5)	(6.3)	(4.6)	1.7	(12.5)	0.0
Fees & Charges	(3.2)	(1.6)	(1.0)	0.6	(3.6)	(0.4)
Total Income	(67.9)	(34.0)	(27.3)	6.7	(66.6)	1.4
Funding	(73.5)	(36.7)	(36.7)	0.0	(73.5)	0.0
Underlying Deficit	0.0	0.0	(2.4)	(2.4)	2.2	2.2
Use of reserves	0.0	0.0	0.0	0.0	0.0	0.0
Revised Deficit (pre-mitigation)	0.0	0.0	(2.4)	(2.4)	2.2	2.2

1.3 Table 2 indicates a potential overspend of £2.2m, primarily due to the additional costs associated with the 9.7% increase to Police Officer pension contributions. This has improved from the Q1 forecast of £2.6m overspend due to favourable movement which relates to additional income in seized vehicles and revised staffing forecasts following the continued management of vacant posts.

1.4 The Employer's contribution to Police Pension increased from 21.3% to 24.2% in 2018/19 with a further increase to 31% in 2019/20. This increase in contribution provides an additional budget pressure of £2.5m based on full establishment. This poses a significant risk to the 2019/20 position, however, the force has partly mitigated through robust vacancy and financial management, and it is anticipated that the projected overspend will be partly off-set by a residual element of the POCA reserve. The pressure forms part of the Forces MTFP and will be managed through associated MTFP saving proposals.

1.5 In addition to this, the following pressures are contributing to the forecast overspend:

- Overtime – a projected overspend of £1.1m (please see overtime section below)
- The confirmed 2.5% pay award for Police Officer's which adds further pressure of £0.116m as the budget was set based on an estimate of 2%.
- Legal costs in respect of the London Bridge inquest of £0.250m
- Non-pay pressures on business rates and subscription charges

1.6 The YTD variance on pay relates to Police pension payments for 2019/20 which are fully funded by Home Office grant. This is processed at year end. The YTD variance position on income relates to Home Office grants which are usually received at year end. Since Q1, £17.2m of grants have been received.

2 Savings Target

2.1 Budget mitigations of £6.3m are required in-year to deliver within budget. This comprises £4.7m in pay and £1.6m in non-pay. There is a plan in place to achieve the required savings during the year, and the plan is being monitored closely through internal governance and fortnightly monitoring meetings with the Police Authority. Pay savings will be found through workforce and vacancy management in core funded posts. The level of monthly pay savings required is £0.390m (81 posts, officers / staff). Non-pay savings of £1.6m have been identified as set out in Table 3 below.

2.2 Current projections indicate we are on course to deliver the required mitigations. However, this does rely on continuation of strong vacancy management throughout the remainder of the year. If and when additional non-pay savings or additional income / funding are achieved, the plan will be adjusted accordingly. There are currently 100 FTE core funded vacancies contributing to the below budget mitigations. Maintaining acceptable service levels whilst holding the required level of vacant posts as part of agreed pay mitigation continues to be challenge.

Table 3

Savings Tracker	Target (£000)	YTD Actual (£000)	Forecast (£000)	Variance (£000)	Risk
Vacancy factor	3,700	1,850	3,700	0	G
Transform pay savings - holding branch	1,000	500	1,000	0	G
Total pay	4,700	2,350	4,700	0	
Corporate Plan income	300	176	300	0	G
Facilities Management	500	250	500	0	G
Seized assets disposal	300	154	300	0	G
Agency staff	500	250	500	0	G
Total non-pay	1,600	830	1,600	0	
Total	6,300	3,180	6,300	0	

3 Directorate Revenue Position

3.1 As at the end of quarter two, current projections indicate a budget deficit of £2.2m. The table below sets out the Directorate position. This includes £6.3m budget mitigations shown above and continued robust vacancy management and the full effect of the increased pension contributions.

Table 4

	2019/20 Budget £'000	Budget YTD £'000	Actual YTD £'000	Variance YTD £'000	Projected Outturn £'000	Projected Variance £'000
BSD	28,591	14,296	1,192	(13,103)	28,386	(205)
Crime	10,584	5,292	5,909	617	10,242	(342)
ECD	7,763	3,882	11,639	7,757	8,585	822
I&I	11,783	5,892	6,272	381	13,153	1,370

UPD	14,759	7,380	9,352	1,972	15,332	573
Grand Total	73,480	36,740	34,363	(2,377)	75,699	2,219

3.2 Table 5 below outlines the position without the additional unfunded pension, which shows a projected budget underspend of £0.044m. The main Directorate movement is within BSD where the unfunded pension increase is held. Budgets for all vacant posts are transferred to BSD as part of the budget mitigations plan.

Table 5

Directorate	2019/20 Budget £'000	Projected Outturn £'000	Projected Variance £'000
BSD	30,909	28,235	(2,674)
Crime	10,155	9,896	(258)
ECD	7,160	8,073	913
I&I	11,484	12,845	1,361
UPD	13,772	14,386	614
Grand Total	73,480	73,436	(44)

Directorate Variances (See Table 4)

3.3 Business Support Directorate (BSD) - £0.205m underspend

The Directorate is forecasting a small underspend. In addition to support service budgets, the Directorate also holds the unfunded additional police officer pension pressure of £2.5m (based on full establishment) as well as the pay budget mitigation of £3.0m. As can be seen from Table 5, the pressure on police officer pensions is the main risk. If this were funded, the Directorate would be reporting an underspend in line with the pay budget mitigations. The position also includes spend of £0.250m relating to the London Bridge inquest. The YTD actual includes receipt of the full year pension deficit grant resulting in a credit position - this will even out as the year progresses. The Directorate is holding core funded net vacant posts of 4.1 FTE.

3.4 Crime - £0.342m underspend

The Directorate is forecasting an underspend primarily due to receipt of additional grant income in year. There are minor variances across non-pay budgets, however, there are no significant financial risks. The Directorate is holding core funded net vacant posts of 14.5 FTE.

3.5 Economic Crime Directorate (ECD) - £0.822m overspend

The Directorate is 81% externally funded. The forecast includes a pressure of £0.5m relating to disputed invoices from Action/Know Fraud Supplier, however

Action/Know Frau continues to be monitored. The appropriate recharge between core funded and externally funded units is subject to on-going review. The Directorate is holding core funded net vacant posts of 10 FTE.

3.6 Intelligence and Information (I&I) - £1.370m overspend

The projected overspend position within I&I is due to a number of factors, primarily relating to non-pay including subscription costs within the Command Hub, professional fees paid for Regulation of Investigatory Powers Act (RIPA) requests in the Central Authorities Bureau and pressures in respect of the cost of licences, subscriptions and maintenance costs for information security.

In addition to this there are pressures on overtime, mainly within the Command Hub. Overtime activity is driven by demand and the 24 hour nature of work that the Command Hub and Surveillance team undertake. Various measures are being introduced to address and manage overtime. For instance, there is a review of work and shift patterns to minimise the need for overtime and efforts to build team resilience at supervisory levels, and the position has improved since Q1.

Overtime however remains an area of risk especially with unpredictable nature of high profile national public order events, including Brexit and Extinction Rebellion. The Directorate is holding core funded net vacant posts of 17.9 FTE.

3.7 Uniformed Policing Directorate (UPD) - £0.573m overspend

The projected overspend is primarily due to overtime, particularly in Firearms, Support Group and Response teams. Measures have been introduced to manage this which have improved the position, however, this remains a significant area of risk with uncertainty around future potential public order events such as Brexit and Extinction Rebellion, as well as staffing pressures in Response Team. There are also additional budget pressures in respect of premises hire costs for firearms training courses. The Directorate is holding core funded net vacant posts of 4.2 FTE.

4 Workforce

4.1 The pay budget constitutes 72% of our expenditure budget and the stringent management of vacant posts is essential to managing the financial position this year. The current establishment, including the 67 growth posts, is 1,358.1 FTE, comprising 840 Officers and 518.1 staff. The actual workforce paid in September was 1,208.81 FTE comprising 761.24 Officers and 447.56 Staff.

4.2 The tables below set out the actual position by month for quarter two. The position reflects the holding of vacant posts required to deliver budget mitigations. Maintaining acceptable service levels whilst holding posts vacant continues to be challenge operationally, however, is required to deliver within budget.

Table 6

FTE	April	May	June	July	August	September
-----	-------	-----	------	------	--------	-----------

Officers	735.00	746.33	748.04	758.41	754.51	761.24
Staff	435.47	435.56	433.81	447.48	444.71	447.56
Total	1,170.47	1,181.89	1,181.85	1,205.90	1,199.22	1,208.81

Headcount	April	May	June	July	August	September
Officers	744.00	763.00	756.00	767.00	763.00	769.00
Staff	447.00	449.00	445.00	460.00	457.00	461.00
Total	1,191.00	1,212.00	1,201.00	1,227.00	1,220.00	1,230.00

4.3 The Prime Minister pledged to recruit 20,000 extra police officers in England and Wales over the next three years, with a recruitment drive starting from September 2019. We have received notification from the Home Office confirming 44 officers for CoLP in 2020/21. The CoLP evidence based bid was for 113 new officers based on the Strategic Threat and Risk Assessment (STRA) review. The STRA identified the need for 180 additional officers and staff, 67 new posts have already been approved by members which left a balance of 113.

4.4 Recruitment towards the 67 growth bid is well under way. At the end of quarter two, 13 posts have been filled and a further 28 posts are expected to be filled by the year end. This is projected to cost £1.0m this year and will be funded through the POCA reserve. The budget will be updated to reflect this in period 7.

5 Income

5.1 Table 7 below sets out the grant funding position for the Force totalling £62.486m. Current projections indicate a high level of confidence in receipt from all funders.

5.2 The majority of grant income are received at the end of year, hence YTD variance. Steps are being taken to claim grant income at stages in the year.

5.3 Current projections indicate a small number of variances against specific grants. The positive variances relate to funding streams where the level of income is dependent on actual activity, hence, where a lower level of spend is projected a corresponding reduction in the level of grant income is forecast. The variance against other miscellaneous income is due to additional income from the Metropolitan Police Service in respect of specific activity and additional expected income from international training and development.

Table 7

Name of Grant	Funding Provider	2019/20 Budget £'000	Actual YTD £'000	Projected Outturn £'000	Projected Variance £'000	Risk Rating
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Police Pensions Grant	Home Office	(20,400)	(18,903)	(20,400)	-	G
National Cyber Security Programme	Home Office	(6,645)	0	(6,645)	-	G
Counter Terrorism Policy Grant	Home Office	(6,270)	(3,150)	(6,270)	-	G
Action Fraud Managed Service	Home Office	(5,500)	265	(5,500)	-	G
Insurance Fraud Enforcement Team	Association of British Insurers	(4,003)	(1,824)	(3,700)	303	G
Action Fraud National Fraud Intelligence Bureau	Home Office	(4,000)	(84)	(4,000)	-	G
Dedicated Cheque & Plastic Card Unit (DCPCU)	UK Payments Administration Ltd	(2,520)	(986)	(2,439)	81	G
National Lead Force	Home Office	(2,500)	-	(2,500)	-	G
Economic Crime Capability Development	Home Office	(2,200)	74	(2,200)	-	G
International Property Crime Investigation Unit (IPICU)	Intellectual Property Office	(1,916)	(807)	(1,788)	128	G
Police Transport Grant	TFL	(1,847)	(475)	(1,847)	-	G
National to Local Fraud & Cyber Data Sharing	Home Office	(1,761)	(0)	(1,761)	-	G
Cyber Griffin	Corporation	(450)	-	(450)	-	G
Late Night Levy	Corporation	(310)	-	(310)	-	G
Firearms Uplift	Mayors Office for Policing & Crime	(284)	-	(284)	-	G
London Safety Camera Partnership	TFL	(264)	-	(264)	-	G
Economic Crime Victim Care Unit	Mayors Office for Policing & Crime	(210)	-	(210)	-	G

Overseas Anti-Corruption Unit	Department for International Development	(171)	(112)	(171)	-	G
NPCC Cybercrime Programme	Home Office	(100)	20	(124)	(24)	G
Tower Bridge	Corporation	(92)	-	(92)	-	G
Regional Organised Crime Unit Coordinator	Home Office	(90)	(95)	(90)	-	G
Other	Miscellaneous	(953)	(324)	(1,429)	(476)	G
Grand Total		(62,486)	(26,400)	(62,474)	12	

5.4 Further work is being undertaken to ensure there is a full cost recovery approach to all funded units. This work is being incorporated in the Medium Term Financial Plan, and contractual arrangements are reviewed as and when existing contracts expire.

6 Capital

6.1 The CoLP position for current live capital schemes is shown in the table below.

Table 8

Core Project	Approved Amount	Spend & Orders to date	Projected spend
	£'000	£'000	£'000
Digital Interview Recording	12	-	12
Emergency Services Network	1,821	1,343	478
Economic Crime Capability Development	74	-	74
HR Time Management & e-Expenses	426	356	70
ICT Support to CCCI	3,360	3,360	-
Police Telephony Upgrade	493	459	34
Ring of Steel Compliance	2,446	2,189	257
Secure City Programme Management	453	321	132
Wide Area Network (WAN) Refresh - Police Recharge	1,445	1,071	374
Police Vehicles 19/20 purchases	301	-	301

IT Modernisation - Desktop & Office 365	3,800	260	3,540
IT Modernisation - Security Zone	850	340	510
IT Modernisation - Sharepoint/Intranet	245	-	245
Total CoLP	15,726	9,699	6,027

Accommodation Project*	39,652	36,597	3,055
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NEP	45,657	11,675	33,982
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*This excludes revenue premises running costs of 21 New Street (£17m budget to 2021)

6.2 Spend and immediate commitments to date plus the projected spend are equal to the approved amount. The projects are subject to the Corporation's Gateway management of capital and supplementary process and as such no overspends on project delivery are allowed unless authorised through that process and given additional budget.

6.3 The accommodation project is managed by City Surveyors with CoLP managing a specific part of the decant strategy. Therefore it is important that Chief Officer Team and Members of Police Authority Board and other committees can see the total amount committed to this project.

6.4 The National Enabling Programme (NEP) will deliver technologies to introduce new ways of working and greater sharing of information, plus a platform for better protection of law enforcement information and assets, contributing to the National Police Chiefs Council (NPCC) Policing 2025 vision. NEP is led by Wayne Parkes (Head of ICT at Warwickshire Police and West Mercia Police) as Programme Director, with Commissioner Ian Dyson as Senior Responsible Officer. All income and expenditure for this national programme is handled by the CoLP finance team and fully funded by Home Office grant.

6.5 In addition to the approved schemes above a number of outstanding bids have been awaiting a decision on the outcome of the City of London Corporation's Fundamental Review and a steer from Members on the prioritisation and funding on the Police Capital Programme in the future. Four bids were previously submitted as part of a prioritisation exercise including IT Modernisation, Secure City, HR Oracle Upgrade and Professional Standards Software. These were not approved, however, now form part of the funding arrangement for 2020/2021 Capital Programme.

6.6 Determining future capital requirements and the strategy for financing them is in progress and forms a key element of a sustainable medium-term settlement. New

capital financing arrangements will enable CoLP to raise its own capital through Prudential Borrowing based on the principles of the Prudential Code.

6.7 The new Capital Programme will be funded by these borrowing arrangements. New borrowing will be capped at £5m per annum from 2020/21 (the Authorised Limit), and there is a need to demonstrate that all new capital expenditure plans are prudent, affordable and sustainable.

6.8 All new capital bids are subject to a CoLP prioritisation process which commences in the autumn, in advance of the new financial year. Standard bid forms are completed by service areas and bids assessed against the CoLP Corporate Plan priorities.

6.9 Following internal assessment and scrutiny, the proposed Capital Programme will be presented to Members for approval via the usual approval route.

7 Transactional

Accounts Payable

7.1 Table 9 below shows the performance relating to payment of invoices within 30 or 10 days. To date this is 95% which is a reduction on the Q1 position and below the corporate target of 97%. This reduction in performance is due to staff shortages and a concentrated effort in clearing backlogs. Measures are being put in place to improve overall performance. Processes are being reviewed and self-service is being rolled out.

Table 9

Month	Total Invoices	Compliant Invoices	%
Oct-18	637	589	92%
Nov-18	662	642	97%
Dec-18	572	545	95%
Jan-19	687	619	90%
Feb-19	587	566	96%
Mar-19	713	686	96%
Apr-19	545	526	97%
May-19	653	618	95%
Jun-19	528	510	97%
Jul-19	598	566	95%
Aug-19	599	568	95%
Sep-19	498	476	96%
Total to Date	7,279	6,911	95%

Accounts Receivable

7.2 As per table 10 below, total Debtors has increased by £2.5m to £3.2m in Q2 from £0.693m in Q1. This is primarily due to the volume of invoices raised in September 2019, therefore increasing the 'less than one month' category.

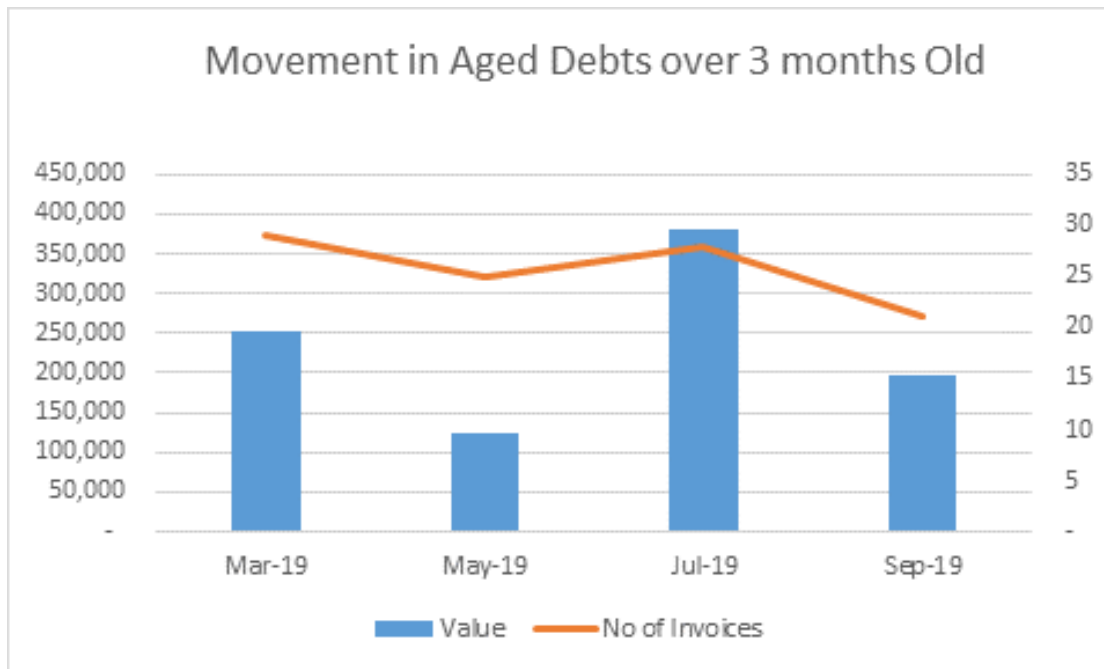
7.3 Debts less than one month old have increased by £2.7m. Debtors over 3 months have decreased by £0.194m from Q1. This is due to active monitoring and working closely with the Corporation to utilise appropriate methods for chasing and collecting debt. Debts over 1 year are currently being reviewed to determine appropriate action.

Table 10

Age	Q1		Q2		Change from Q1 to Q2	
	Count	Value £	Count	Value £	Count	Value £
Less than 1 Month	7	235,836	36	2,954,965	29	2,719,129
1 - 2 Months	2	63,158	7	25,075	5	(38,083)
2 - 3 Months	3	12,250	3	40,630	0	28,380
3 - 12 Months	16	357,471	9	173,498	(7)	(183,973)
Over 1 year	12	24,597	12	24,266	0	(331)
Total	40	693,312	67	3,218,434	27	2,525,122

Accounts receivable activity in Q2:

Summary of Movements	Q1 2019		Q2 2019	
	No	Amount	No	Amount
Number of Invoices Paid	(17)	(603,883)	(31)	(636,714)
New Invoices Raised	4	210,741	44	3,016,823
Credit Notes Issued	0	0	(5)	(48,988)
Debts Written Off	0	0	0	0



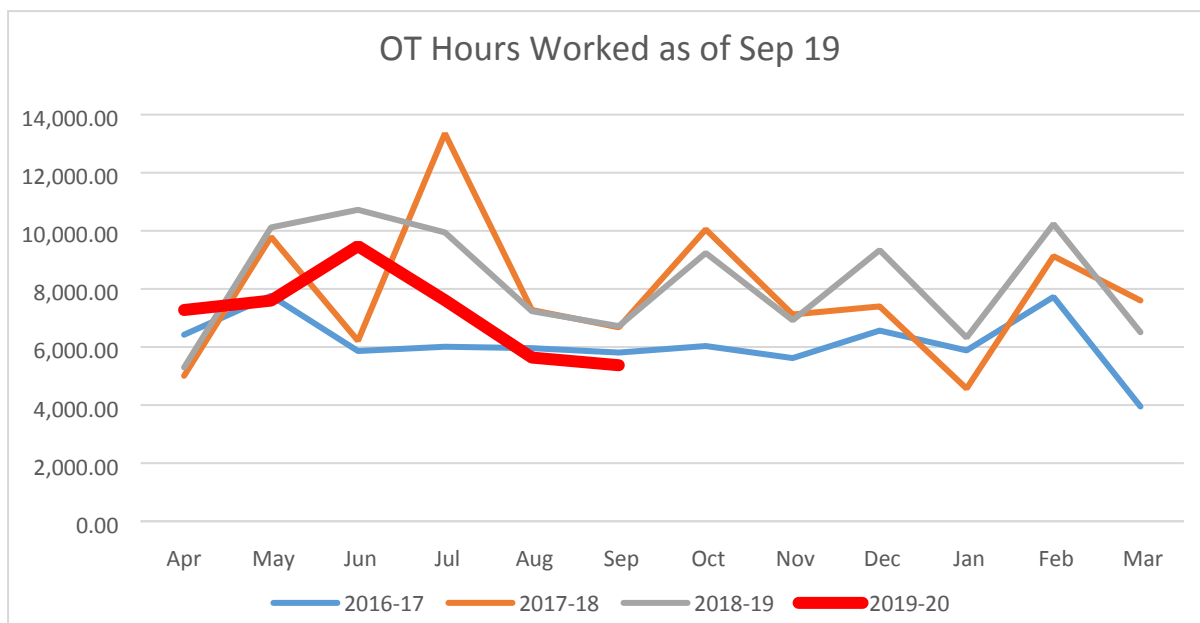
Overtime

7.4 The level of overtime spend forecast continues to be in line with the first quarter of the year. The Force wide budget is £2.0m, split £1.6m core funded and £0.4m funded units. This includes overtime in respect of bank holidays and tasking.

7.5 Actual spend at the end of second quarter is £1.1m covering both officers and staff. Current forecasts indicate spend of £3.1m, which is £1.1m over budget.

7.6 Spend levels for the second quarter are on average 16% lower than previous years. This reduction has come from a combination of controls being put in place and clear communication to managers within the Force to manage overtime. The position continues to be closely monitored and reported at Chief Officer Level.

7.7 The chart below shows the current trend on overtime hours worked to the end of September 2019. The trend currently indicates a reduction in overtime compared to previous years and suggests controls are effective. However there is increased risk in the second half of the year due to potential public order events.



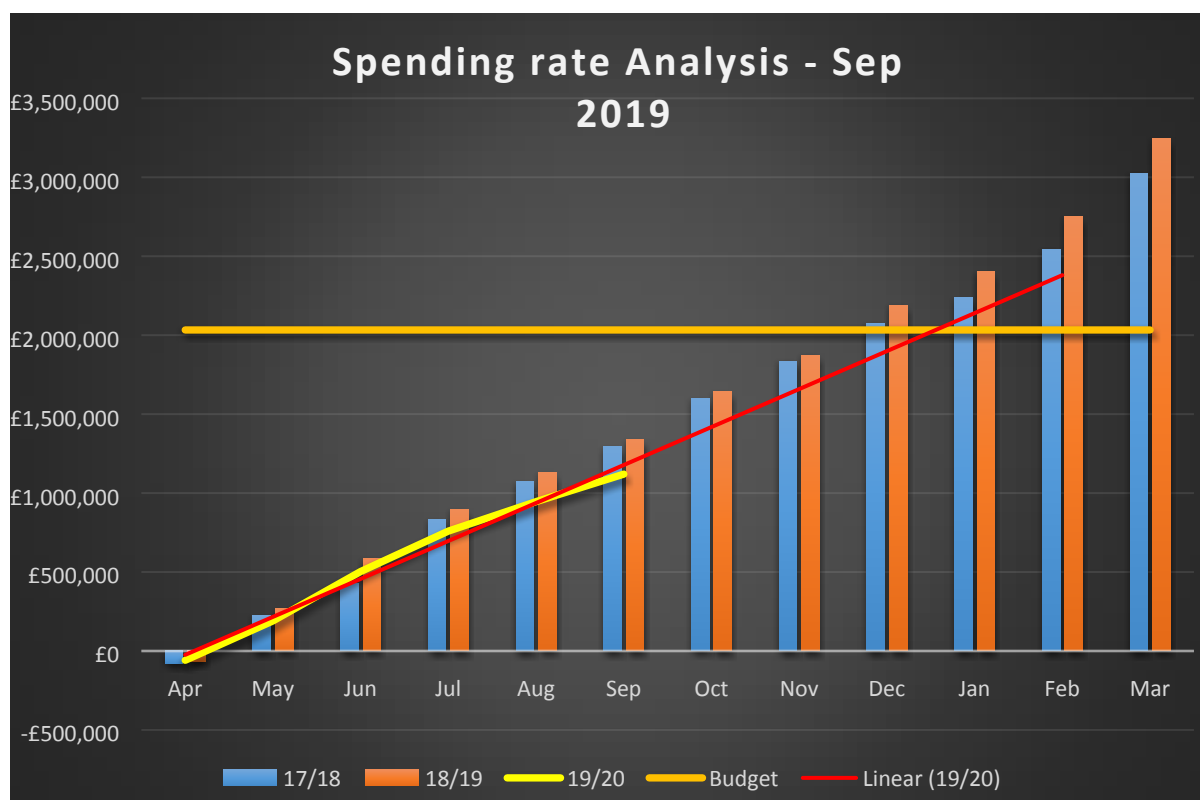
7.8 The main reasons for claiming overtime are:

- Covering for vacant posts (backfilling / Business as Usual)
- Extinction / Animal Rebellion protests
- Pan London Brexit protests
- TFG including Bank of England armed escorts (which is substantially recovered through the contract)

7.9 Expenditure of £100,000 to date relates to Extinction / Animal Rebellion protests, and further expenditure is anticipated as overtime claims are being processed. We will submit a bid to the Home Office to seek to recover some or all of this.

7.10 The largest spending Directorate is UPD which constitutes 64% of overtime. The main reason is business as usual which accounts for 35%. It is expected that the need for backfilling and BAU will reduce as vacancies are filled, however, it is difficult to predict requirements relating to future known and unknown policing requirements. Discussions are taking place with the Home Office in respect of special grant funding relating to increased public order requirements.

7.11 The chart below shows cumulative overtime spend against the last two years. This indicates spend on a slightly lower trajectory. If this were to continue the full year budget will be fully utilised by January 2020. Although spend has continued to drop in comparison to previous years, forecasts for overtime has remained at £3.1m due to the potential risk of further public order events.



8 Brexit

8.1 The City of London Police has identified potential risk to public order during the Brexit period, which will add further pressures on the revenue budget. Any sizeable protest within the City footprint that led to disorder would require a regional mobilisation response. This would mean a large number of Police Support Units within the City dealing with protest.

8.2 The Corporation of London made funds available to meet Brexit preparation costs, and CoLP secured funding for upfront investment and contingency plans. Funding may also be available from the Home Office, however, no such funding was available during 2018/19.

9 Use of Reserves

9.1 The Police reserves position is summarised in Table 11 below. The Police General Reserve was fully utilised in 2018/19 and drawdowns were made from the Transformation Reserve and the Action Fraud reserve to match expenditure. It is anticipated that approximately £1m will be spent from the POCA reserve to fund recruitment of 41 of the 67 new post, which will leave a projected closing balance of £1.53m. This may be used to offset the projected overspend of £2.2m, which includes the additional pension pressure of £2.5m.

Table 11

	Opening Balance (£M)	Projected Spend (£M)	Projected Closing Balance (£M)

General	0	0	0
POCA	(2.53)	1.0	(1.53)
Action Fraud	(1.71)	1.71	0
Transformational Funding	(0.06)	0.06	0
Total	(4.3)	2.77	(1.53)

10 Risk Management

10.1 Table 12 below identifies the key risks and mitigating controls contained within this report: (quantums have been included where possible)

Table 12

Risk	Risk Mitigation
Major incidents	Early engagement with the Home Office to ensure opportunities for cost recovery are maximised.
Crime Performance / Safety issues	All such issues will be reported to Members
Vacancy factor	It is challenging to maintain acceptable service levels with a vacancy factor of 81. The vacancy factor will be reviewed and revised throughout the year, if and when the financial position improves from additional non-pay savings / additional income. All recruitment is approved by the Strategic Workforce Panel.
Budget mitigations and additional pension pressure	Fortnightly strategy meetings are held with the Commissioner, Town Clerk and Police Authority Policy and Finance, reviewing and challenging budget and savings assumptions.
Overtime budget	Enhanced controls have been introduced to manage the overtime budget
Deferred Weekly Leave (DWL)	Accrued DWL has been quantified, currently £1.4m for Officers and £0.07m for staff, however, the build-up of DWL may be subject to unplanned events over the year. Currently no financial implication, however, continues to be reviewed.

Use of agency staff	Reliance on agency staff has been greatly reduced
Further cost pressures for Action Fraud	Under review and close scrutiny
Capital Programme progress and potential slippage	The Capital Programme is monitored throughout the year, capital recharges will be undertaken in a timely manner. The proposed 2020/21 Capital Programme has been drafted.
Brexit	Expenditure will be monitored closely, and external sources of funding will be explored. A bid for £0.9m was previously submitted to the Corporation covering potential risk. So far this year we have spent £0.04m
Events policing	Finance Business Partners will work closely with services to ensure chargeable events policing is captured in a timely manner and recharged accordingly.
Vehicle fleet management	A Strategic Fleet Management Group chaired by the Assistant Commissioner has been re-established and is monitoring Financial risk around replacement spend. A loan of £1.8m from the Corporation has been approved for the capital scheme relating to vehicles, of which £0.74m is expected to be spent in this financial year. To date, £0.3m has been released in respect of the purchase of vehicles.

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Committee(s)	Dated:
Performance and Resources Sub (Police) Committee	15 th November 2019
Subject: Internal Audit Update Report	Public
Report of: Matt Lock, Head of Audit and Risk Management	For Information
Report author: Jeremy Mullins, Audit Manager	

Summary

The purpose of this report is to provide the Committee with an update on the work of Internal Audit that has been undertaken for the City of London Police (CoLP) and the Police Authority since the last report in February 2019.

Since the June 2019 Committee meeting three Final audit reports have been issued: Interpreters Fees; Police Accommodation; Fleet Street Accommodation. Two Draft reports have been issued: Procurement Contract Management; and Front Offices; Premises. Fieldwork for three further audits is in progress: Police Premises Expenditure; Police Payroll and Overtime; and Transformation Change Programme Phase 1.

There are 11 planned corporate-wide audits within the 2019-20 plan. None of the recommendations arising from these audits to date have referred directly to the CoLP.

There were 16 “live” recommendations at 30th June There are currently six “live” recommendations. The following table provides summary details of the current status of the 16 “live” recommendations as at 30th June.

	Red	Amber	Total
Number Implementation Evidenced		10	10
Number Revised Implementation Date Provided	1	3	4
Partially Implemented		2	2
Total	1	5	16

Recommendation

Members are asked to:

- Note the report

Main Report

Internal Audit Planned Work and Planned Audit Days

1. The following table provides details of Police Authority audit work undertaken and planned (See Appendix 1).

Internal Audit Plan City of London Police

Agreed Total Audit Planned Days		
Audit	Current Stage	Audit Days
Interpreters Fees	Final Report	5
Contract Management	Draft Report	10
Front Offices	Draft Report	10
Premises Expenditure	Fieldwork	15
Payroll and Overtime	Fieldwork	15
Transform Change Programme Phase 1	Fieldwork	6
Transform Change Programme Phase 2	Not started	14
Workforce Planning	Not started	15
Financial Forecasting	Not started	20
Total Days		110

2. The following table provides details of Police Authority audit work undertaken and planned (See Appendix 1)

Internal Audit Plan City of London Police Authority

Audit	Current Stage	Audit Days
Police Key Financial Controls	Completed	20
Police Key Financial Controls – additional testing	Completed	10
Police Accommodation Programme	Final Report	20
Fleet Street Accommodation Programme	Final Report	15
Contingency	Not allocated	20
Total Police Authority Plan Days		85

3. The following table provides details of the outcome of audits completed to a minimum of Final Report stage (See Appendix 1).

Audit	Assurance Rating	Recommendations			
		Red	Amber	Green	Total
Interpreters Fees	Amber	0	2	2	4
Police Accommodation Programme	Red	5	0	0	5
Police Key Financial Controls	Amber	3	9	0	12
Police Key Financial Controls – additional testing	Amber	0	5	0	5
Fleet Street Accommodation Programme	Amber	1	2	0	3
Overall Rating to date 2019-20	Amber	9	18	2	29

Key Conclusions of Finalised Audit Reports July 2019 to October 2019

Police Interpreters Fees (5 days) AMBER ASSURANCE

4. The objectives of this Internal Audit review were to verify that adequate arrangements are in place to support payment and management of Police – Interpreter Fees.
 - Policies and procedures are in place covering the processing of interpreter fees.
 - Interpreters used are selected from an approved list.
 - Payments are made in accordance with approved rates.
 - Processes are in place to monitor / manage the overall costs of interpreter fees.
5. The current Interpreter Fees Claim Procedure is dated 2010 and has not been reviewed or updated since introduction.
6. The Agreement between the MPS and CoL has not been subject to an annual review as required within the Terms and Conditions of the Agreement.
7. Whilst it is the responsibility of the MPS to identify and maintain the list of interpreters, audit testing identified that four Interpreter Claim Forms (relating to three interpreters) were received from claimants not on the NRPSI list.
8. Delays in processing Interpreters' Claim Forms have resulted in late payment to the interpreters
9. Four recommendations were made for the areas of improvement listed above. The Commissioner agreed to implement all four recommendations 30th November 2019.

Police Accommodation Programme 2012 – 2017 (15 days) RED ASSURANCE

10. The purpose of this audit was:

- To determine why there were issues with programme option appraisals and detailed designs that resulted in significant changes in the direction of the project, as outlined above;
- To identify and catalogue the key programme issues leading to both significant delays and substantial increases in programme costs;
- To assess the appropriateness of management action taken in response to lessons learned.

11. The audit established the lack of suitably skilled and experienced;

- Programme team within the City;
- External Consultants.

12. The audit established that external consultants WYG did not have appropriate expertise for a programme of the nature of the Police Accommodation Programme.

13. The audit identified that the City Police failed to provide robust challenge to the options pursued in respect of the Police Accommodation Programme.

14. The tender documentation issued when procuring the services of WYG in 2014, the audit confirmed that the tender documentation failed to set out the City's detailed requirements in relation to producing detailed designs for the Police Accommodation programme.

15. The Police Accommodation Programme was significantly delayed; a key reason for this was failure to engage specialist consultants in a timely manner e.g. security specialists.

16. Five recommendations were made for the areas of improvement listed above. The City Surveyor in consultation with the Commissioner agreed all recommendations and these were implemented for the Fleet Street Scheme Programme.

Fleet Street Estate Programme (15 days) AMBER Assurance

17. The purpose of the audit was to obtain reasonable assurance that appropriate action has been taken to address lessons learned from the Police Accommodation Strategy in delivering the Fleet Street Estate for the City Police.
18. The Chamberlain's department has expressed concerns that department comments have not always fed into reports presented to Members. Furthermore, the department has also expressed concerns that reports presented to Members are often issued with insufficient time for comments from key stakeholders to be provided on the reports.
19. Full programme cost estimates were not presented to Members of the Capital Buildings Committee at its March and July 2019 meetings. The cost estimates presented only included projected construction costs.
20. Two recommendations were made for the areas of improvement listed above. The City Surveyor in consultation with the Chamberlain agreed all recommendations and these were implemented for the Fleet Street Scheme Programme.
21. More detailed key conclusions for these three audits are included within Appendix 3.

Implementation of Audit Recommendations

22. There were 16 “live” recommendations at 30th June 2019: one Red Rated; and fifteen Amber Rated. Ten of these recommendations have now been implemented. Full details of the status of recommendations are contained in Appendices 2.

	Red Rated	Amber Rated
Implemented	0	10
Partially Implemented	0	2
Revised target date provided	1	3
Total	1	15

The live Red Rated recommendation is as follows:

Audit Name	Recommendation	Assurance Rating	Status
Key Financial Controls 2018-19	<p>MK02998 The budget-setting process should incorporate:</p> <ul style="list-style-type: none"> Stakeholder input to ensure alignment with operational requirements; Clear linkage with the Medium-Term Financial Plan and Workforce Plan; Local arrangements for scrutiny; Retention of documentation to reflect key elements of the process e.g. meetings between Finance Business Partners and budget holders and working papers to support budget calculations. 	RED	Revised Implementation Date 30 th April 2020

Corporate Wide Audits 2019-20

23. The following corporate wide audits have been included within the Internal Audit Plan 2019-20. Where findings and agreed recommendations impact on the City Police, the subcommittee will be advised of the details. Corporate Wide audit work has not resulted in any recommendations that directly impact on the City Police to date.

- Corporate Wide Change Control
- Corporate Wide Project Management
- GDPR Compliance
- Fire Safety Management
- Asset Management
- Projects Change Control Management
- Project Estimating (Gateway Process)
- Workforce Planning
- Legionnaires Risk Management
- Use of Consultants
- Apprenticeships

Conclusions

24. Work is progressing on the 2019-20 Internal Audit Plan. The Final Reports have been issued for three audits; draft reports have been issued for two audits; and the fieldwork is progressing for three more audits.

25. There are currently 6 “live” Amber rated audit recommendations.

Appendices

- Appendix 1 - Schedule of Internal Audit Planned Work
- Appendix 2 - Schedule of “live” audit recommendations as at 31st October 2019
- Appendix 3 - Key Conclusions of Finalised Audit Reports July 2019 to October 2019

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City Police - Schedule of Internal Audit Projects

Full Reviews				Recommendations			
Project	Planned Days	Planned Completion Date	Current Stage	Total Red	Total Amber	Total Green	Total
<u>Police Key Financial Controls</u> An examination of the financial administration of the CoLP	20	31 st January 2019	Completed (Mazars Delivery)	3	9	-	12
<u>Police Key Financial Controls</u> – additional testing	10	30 th June 2019 (Actual)	Completed (Mazars Delivery)	-	5	-	5
<u>Interpreters Fees</u> A probity exercise comparing a sample of claims to guidance will be undertaken.	5	17 th July 2019 (Actual)	Final Report (Mazars Delivery)	0	2	2	4
<u>Police Accommodation Programme</u> To examine the reasons why the estimated cost of the original police accommodation programme increased from £40million to £124million.	15	30 th October 2019 (Actual)	Final Report (In-House Delivery)	5	0	0	5
<u>Fleet Street Accommodation Programme</u> An audit to determine the impact of “lessons learned” from the previous accommodation programme.	15	30 th October 2019 (Actual)	Final Report (In-House Delivery)	0	2	0	2
<u>Police Procurement Contract Management</u> The audit will examine the way in which the Force manages contracted service provision for a sample of contracts.	10	30 th October 2019	Draft Report (Mazars Delivery)				

Full Reviews			Recommendations				
Project	Planned Days	Planned Completion Date	Current Stage	Total Red	Total Amber	Total Green	Total
<u>Police Front Offices (including income collection and banking)</u> The purpose of this audit is to determine the adequacy of controls exercised by Police Station front desks over the handling of seized goods (including cash), lost property, and income for services.	10	30 th October 2019	Draft Report (Mazars Delivery)				
<u>Police Premises Expenditure</u> This audit will examine the controls over identifying faults and arranging building repairs. It will also look at the control over payments of utility bills and initiatives to reduce energy consumption.	15	30 th November 2019	Fieldwork (In-House Delivery)				
<u>Payroll and Overtime</u> The purpose of this audit is to examine the controls in place to ensure that officers are paid the correct salary in accordance with contracts of employment. In addition, it will examine the veracity of overtime payments made to officers.	15	30 th November 2019	Fieldwork (Mazars Delivery)				

Full Reviews				Recommendations			
Project	Planned Days	Planned Completion Date	Current Stage	Total Red	Total Amber	Total Green	Total
<u>Transform Change Programme Phase 1</u> desktop review of high-level design.	6	31 st July 2019	Fieldwork (Mazars Delivery)				
<u>Transform Change Programme Phase 2</u> Assurance: quality of planning; confidence of delivery (implementation capability and capacity); efficiency planning and tracking.	14	31 st March 2020	Not Started (Mazars Delivery)				
<u>Workforce Planning</u> This audit will examine the process for determining the level of staffing the Force requires and how planned staffing numbers are to be achieved.	15	31 st March 2020	Not Started (Mazars Delivery)				
<u>Financial Forecasting</u> The purpose of this audit is to provide assurance on the process for the control of net expenditure.	20	31 st March 2020	Not Started (Mazars Delivery)				

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Appendix 2

Schedule of “live” audit recommendations as at 31st October 2019

Audit	Recommendation	Management Responses	Action Required	Target Dates	Status
Demand and Event Policing 2017-18	<p>MK02941 The Director of Finance should introduce a record of event income and expenditure compiled from income receipts and actual income related to this police function. Where the CoLP is subsidising the provision of event policing from core funding; this should be reported to the Senior Management Team.</p> <p>Assurance Rating: Amber</p>	<p>Initial Response: Accepted and will be compiled by the Director of Finance</p>	CoLP to provide an update on the progress.	<p>Original 30th September 2018</p> <p>Revised 30th September 2019</p>	<p>This is work in progress. “Events” is a specific agenda item for FBPs every month for meetings with services. Records will be maintained for all events, chargeable and non-chargeable. Chargeable work will be tracked separately by one dedicated FBP and invoices will be raised in a timely manner. Evidence provided – FBP monthly meeting agenda</p>

Audit	Recommendation	Management Responses	Action Required	Target Dates	Status
Key Financial Controls 2018-19	<p>Mk02998 The budget-setting process should incorporate:</p> <ul style="list-style-type: none"> Stakeholder input to ensure alignment with operational requirements; Clear linkage with the Medium-Term Financial Plan and Workforce Plan; Local arrangements for scrutiny; Retention of documentation to reflect key elements of the process e.g. meetings between Finance Business Partners and budget holders and working papers to support budget calculations. <p>Assurance Rating: Red</p>	<p>Initial Response</p> <p>The Medium-Term Financial Plan is currently being developed with regular involvement of and weekly challenge from the Corporation. This detailed work will form the basis of the annual budget for 2019/20. Between September and March there will be regular meetings between Finance Business Partners and Budget Holders with an agenda agreed by the Finance Director. All actions will be recorded centrally by the Finance Directors PA.</p>		<p>Original 31st March 2019</p> <p>Revised 30th April 2020</p>	<p>Revised Implementation Date Obtained.</p>

Audit	Recommendation	Management Responses	Action Required	Target Dates	Status
Key Financial Controls 2018-19	<p>Mk02999 CoLP should produce documented procedures to support key financial administration processes such as AP and AR processing, ensuring that these are made available to all relevant staff.</p> <p>Assurance Rating: Amber</p>	<p>Initial Response</p> <p>Admin Finance team will draw together internal processes notes which will be checked with the Corporation Procurement team to ensure they meet with system and process guidelines. Force wide communications will also be issued to ensure all members of the Force are clear on the purchase to pay process. Court Funds process notes are being prepared by the Supervisor in that team which will allow clarity for people involved in that process.</p>		<p>Original 31st March 2019</p> <p>Revised 30th September 2019</p>	<p>Partially Implemented – revised timescale required for full implementation</p> <p>Work in progress. New systems are being implemented and will be documented as and when this work is completed.</p>

Audit	Recommendation	Management Responses	Action Required	Target Dates	Status
Key Financial Controls 2018-19	MK03004 All CoLP procurement should be in line with the corporate Procurement Code, including adequate operational planning to eradicate procurement breaches Assurance Rating: Amber	Initial Response Finance Business Partners will work with business areas and Corporation Procurement to develop sourcing plans for financial year 2019/20 which will allow for appropriate planning which will reduce procurement breaches.		Original 31 st March 2019 31 st March 2020	Work in Progress
Key Financial Controls 2018-19	MK03005 The potential for introduction of a finance dashboard, providing a high-level overview of the monthly management accounts, should be investigated by CoLP in conjunction with the Chamberlain's Financial Services Decision. Assurance Rating: Amber	Initial Response Work has already started on improving management information provided to budget holders. This work will be developed further with the corporation to see if a dashboard can be developed through the Corporations Oracle platform.		Original 31 st March 2019 Revised 31 st December 2019	Work in progress
Key Financial Controls 2018-19	MK03007 Budget monitoring processes should identify necessary actions to reduce the risk of funded units being subsidised by core operations; key points to be reflected in the monthly monitoring records. Assurance Rating: Amber	Initial Response It is important to note that a lot of funded units are carrying out core policing functions and the funding reduces the burden on core funding.		Original 31 st March 2019 Revised 31 st December 2019	Work in progress. A review of funded units and an appropriate standard charging mechanism is being developed. There is not always a clear distinction between core and funded work, and there will always be a cross-over. However, this will be identified in a transparent model and monitored accordingly.

Key Conclusions of Finalised Audit Reports July 2019 to October 2019

1. Police Interpreters Fees (5 days) AMBER ASSURANCE

Key Conclusions

Policy and Procedures

An Interpreters' Claim Procedure (the Procedure) is in place and available on a shared drive, accessible by relevant members of staff.

Selection of Interpreters

A Memorandum of Understanding (MoU) has been agreed between the Metropolitan Police Service (MPS) and the CoLP for the provision of Language and Interpreting services, including the translation of documents. The CoLP request interpreter services by contacting the MPS Interpreter Deployment Team (IDT) and referral to an appropriate interpreter is provided.

The MoU which commenced on the 1 October 2017 is required to be reviewed annually; there is no evidence that this has occurred.

Sample testing of 20 interpreter's fees claimed identified four instances (relating to three interpreters), where the interpreter was not registered on the National Register Public Service Interpreter (NRPSI) database.

Payment are only made in accordance with approved rates

Testing confirmed that an Interpreters Claim Form was raised by each interpreter providing the service, which is signed by the officer requesting the service before being sent to the Finance Admin Team for processing.

The Finance Admin Team check the details and enter the claim information into a spreadsheet which is independently checked. The spreadsheet calculates the amount due and generates a unique reference number. The Form is then passed to Finance – Accounts Payable, for payment to be made.

Testing of a sample of 10 Claim Forms identified eight claims had not been processed for payment within 14 days of the service being provided (five took over one month).

Budget Monitoring

The total budget for interpreter fees across various directorates was £66,000 for the financial year 2018/19. Outturn was 96,500. The overspend was attributed to a higher level of estimated crime perpetrated on foreign speaking suspects and victims. The budget estimate for 2019-20 is £19,000 and actual expenditure to 30th October 2019 was £44,734. The Head of Finance for the Police Authority working with the Chief Operating Officer for the City Police is monitoring overall budget performance on a period to period basis.

Four recommendations were made as a result of this audit: two amber rated and two green rated. The Commissioner has provided a target date of 30th November 2019 to implement all four recommendations.

2. Police Accommodation Programme 2012 – 2017 (15 days) RED ASSURANCE

Key Conclusions

Issues Relating to Project Options Appraisals and Detailed Designs

Original Outline Options Appraisal and Detailed Design (2012 onwards)

The original outline options appraisal, completed in 2012, identified occupying Guildhall Yard East, constructing a new specialist facility at Walbrook Wharf and refurbishing the Wood Street premises as the optimum solution to satisfy the new 150,000 square feet space requirements of City Police (down from c.250,000 square feet). The financial estimate was for £30million to £45million. The programme was planned to be partly funded by disposals of Bernard Morgan House, Bishopsgate and Snow Hill premises (£16m-£27m, leaving a funding gap of £3m-£29m). The outline options appraisal was undertaken by external consultants DTZ, at a cost of £43k.

Alternative options included maintaining the status quo or consolidation of and investing in existing accommodation. DTZ recommended the above option after completing a value for money analysis based on both financial and non-financial criteria including 'delivery of solution', 'fitness for purpose' and 'operational benefits.'

At their respective meetings in November and December 2012, the Members of the Police Committee, Projects Sub Committee and Corporate Asset Sub Committee approved the selected option after receiving a joint report from the Commissioner of the City of London Police and City Surveyor.

A tender exercise was undertaken in February 2014 to appoint a Programme Manager and specialist design team to prepare the detailed design of the various projects within the programme. The contract was subsequently awarded to White Young Green (WYG) at a contract price of £2.4million. Examination of the tender evaluation exercise documents identified that WYG did not provide sufficient evidence to confirm that they had the necessary experience in delivering programmes of this nature. The City incurred £1.5m with the firm between 2014 and 2017.

A review of supporting programme documentation by internal audit identified the following issues with the options appraisal and subsequent detailed design;

Outline Options Appraisal

- A fully defined, clear and comprehensive occupiers' requirement was not produced by City Police at the outset which City Police were embarking on the organisational change workstreams. In particular, there was no clear basis for determining the 150,000 square foot requirement.

- The outline options appraisal did not take into account the security requirements required for the accommodation. The sites are on main thoroughfares which makes them vulnerable for terrorist attacks and impossible to secure the perimeter. There is no evidence that consideration was given to obvious security issues prior to committing resources to this option. Although it is noted that the City Police had considered these issues and did not consider that they posed a major obstacle.

Detailed Design

- The subsequent detailed design work undertaken by WYG could not identify how the Walbrook Wharf premises could accommodate the City Police in a new build facility together with the existing waste contract services at Walbrook Wharf and satisfy Home Office requirements for new custody suites. This issue and risk should have been identified as part a feasibility study and may have immediately ruled out the site as a viable option.
- The proposed floorplans produced for Walbrook Wharf were not compliant with legislation and Home Office requirements. Under legislation, custody suites cannot be located in close proximity to bridges or rivers due to risk of suicide.

Consequently, the Walbrook Wharf proposal was rejected and replaced with a revised strategy of relocating custody suites to the Wood Street project with an extension, subject to planning permission.

On the basis of the above, the audit has concluded *that had more robust feasibility studies been undertaken at a larger fee expense, including more detailed consideration of relevant custody suite legislation, Walbrook Wharf would have been identified as a non-viable option at a much earlier stage.* The lack of appropriate expertise on behalf of the programme team, as set out in paragraph 8, and project consultants compounded this issue. A programme team with appropriate experience would have identified these issues immediately.

Furthermore, a clear and comprehensive requirement together with robust challenge from the City Police would have helped to identify these issues at an earlier stage.

Revised Options Appraisal and Detailed Design (2015 onwards)

A revised options appraisal was subsequently undertaken by the City Surveyor's department; the option of having two main sites, refurbishing Guildhall Yard East and extending Wood Street was selected. In respect of Wood Street, the option of building a new tower and infilling the courtyard area was selected and approved by Members in 2015. The total cost of the project was expected to be approximately £95m less disposal proceeds of £65m, leaving a net cost of £30m. The detailed design was completed by WYG.

Other options included variations of the preferred option e.g. 'refurbish Wood Street, construct courtyard infill but not building the tower' was an option considered. A further option to remain in the current estate. Again, the preferred option was determined based on a value for money analysis factoring in both financial and non-financial criteria e.g. efficient use, fitness for purpose, and to maximise the City's asset.

The preferred option was approved the Members of the Police Committee, Projects Sub Committee, Finance Committee and Resource Allocation Sub Committee Corporate Asset Sub Committee at their respective meetings in July 2015, after receiving a joint report from the Commissioner of the City of London Police, City Surveyor and the Chamberlain.

On the basis of discussion with the City's Programme Director and City Police's Director of Estates together with a review of reports presented to Members, the established that:

- As set out previously, there was a lack of fully defined, clear and comprehensive requirement produced by City Police at the outset due to the proposed changes in the agreed space to be provided (250,000 square ft to 150,000 square ft);
- There was insufficient attention paid to security requirements within the outline options appraisal and feasibility studies, and as the detailed design progressed it was determined by the City Police and the external consultants the Wood Street site, as a Grade II listed building, would not provide the requisite bomb blast resistance in the event of a terror attack;
- The detailed design could not identify suitable detailed design solutions for the Custody Suite and Joint Contact and Control Room due to the physical building constraints of Wood Street and meeting the necessary operational requirements.

Again, on the basis of the findings in the above paragraph, the audit has concluded that had earlier robust feasibility studies been undertaken Wood Street would have been identified as a non-viable option at a much earlier stage. In addition, the lack of appropriate expertise on behalf of the City Police and City of London programme teams and project consultants compounded this issue.

In addition, clear and comprehensive requirement together with robust challenge from the City Police would have helped to identify these issues at an earlier stage. (It is noted that the City Police have stated that they were not involved in the original options appraisal and did challenge the concept design drawings when these were shared with them).

By October 2017, expected costs had increased to £139m (less disposal proceeds of £71m, net cost £68m).

Through review of the tender documentation issued when procuring the services of WYG in 2015, the audit confirmed that it failed to set out the City's detailed requirements in relation to producing detailed designs for the Police Accommodation programme as these were not available from City Police. Despite requesting the tender documentation issued for procuring the services DTZ in 2012 and WYG in 2015, these were not available. In order to be effective, tender documents need to include a comprehensive set of requirements.

As set out within the introduction to the report, a feasibility study has now been undertaken in respect of further option - a new build solution on Fleet Street; the site is planned to be shared with Her Majesty's Court and Tribunals Service. The feasibility study was undertaken by Eric Parry Architects and specialist sub-consultants. As part of this, the security requirements for the new site were evaluated. It is understood that the Fleet Street programme is provisionally planned to be completed by 2025 at a total outturn cost of £278m including the appropriate proportion of overall development cost (less estimated capital receipts of £97m for COLP assets, net cost £181m).

Programme Delays

Based on discussions with the City's Programme Director and City Police Director Estates, together with a review of supporting programme documentation, including reports to Members, the audit confirmed that there were significant delays to the original programme for the following reasons:

- The lack of fully defined, clear and comprehensive requirement for providing the City Police with fit for purpose accommodation produced at the outset.
- The failure to identify at an early stage that both Walbrook Wharf and Wood Street were not feasible options for the specific operational and security requirements of City Police meant that WYG invested significant time into producing detailed designs iterations, which were all eventually rejected by City Police.
- The decant strategy was revised during 2016 as a result of changes in building availability. That is, all of New Street became available for City Police use which was a preferred decant solution for City Police, and the building at Finsbury Street was then re-let to a commercial tenant, (it was let once members agreed to take all of New Street and hence City Police no longer required it).
- There was a significant delay in submitting the Planning Application for the Wood Street premises due to the complexities of extending Grade II listed building and objections from Historic England to be overcome.
- The joint City of London and City Police Project Team and external consultants have not demonstrated that they had the requisite knowledge, skills, or experience to provide support in delivering such a complex

programme. For example, the security limitations of Wood Street were not identified until 2017, five years after the programme commenced.

On the basis that both the original option of revised options were eventually rejected, the audit has concluded that there was a lack of robust challenge from the City Police in respect of the options pursued. (The City Police have stated that they were not involved in the original concept design).

Programme Cost Increases

Through review of reports presented to the Police Committee, Projects Sub Committee and Corporate Asset Sub Committee in November and December 2012, the audit confirmed that the original programme costs were expected to be in the region of £30-45m (disposal proceeds £16m-£27m, net cost £3m-£29m).

On the basis of a review of reports presented to Police Committee, Finance Committee, Project Sub Committee and Resource Allocation Sub Committee, the estimated revised programme costs, as per financial forecasts prepared by the City Surveyor's department, increased from approximately £96m (less disposal proceeds of £65m, net cost £30m) in July 2015 to approximately £139m (less disposal proceeds of £71m, net cost £68m) in October 2017. The increase mainly resulted from re-inclusion of a 'third building' requirement from City Police costs as a result of height restrictions imposed on the Wood Street Tower, together with failure to identify the full costs of refurbishing 21 New Street and Bishopsgate Police Station as part of the decant strategy.

The current day cost including fees, inflation allowance and appropriate proportion of the overall development costs of the Fleet Street Programme to the City Police is expected to be in the region of £278m (less £97m capital receipts, net cost £181

Management Action in Respect of Lessons Learned

The progress in addressing these issues to the Fleet Street Programme have been assessed as part of this audit. The audit has confirmed that the following areas have not yet been fully addressed yet:

- The Programme Team and external consultants used should possess relevant expertise, skills and knowledge to undertake such a complex programme (recommendations 1 and 2);
- The City Police should have provided robust challenge to options pursued (recommendation 3).
- The Programme Team should ensure that all occupier requirements are included within tender documentation for the Fleet Street programme, when procuring the services of external consultants (recommendation 4);

- Appropriate specialists should be engaged, and appropriate budget made available when undertaking the initial option appraisal and feasibility exercise processes (recommendation 5).

Five Red Assurance Level recommendations were made as a result of this audit.

A further audit on the Fleet Street Estate programme was completed in October 2019. The purpose of the audit was to assess the extent to which the lessons learned from the Police Accommodation Programme have been addressed as part of the Fleet Street Estate Programme. This audit has established that all five recommendations made as a result of the Police Accommodation Programme Audit have been implemented.

Fleet Street Estate Programme (15 days) AMBER Assurance

Key Conclusions

Lesson learned: A fully defined, clear and comprehensive requirement for providing the City Police with fit for purpose accommodation should be produced

On the basis of discussion with the Project Director, together with inspection of programme records the audit established that:

- the City Police determined high-level accommodation requirements to facilitate completion of the programme Feasibility Study, conducted by Eric Parry Architects;
- the City Police subsequently prepared a schedule of accommodation requirements to feed into the Project Brief issued as part of the documentation to procure the Design Team consultants;
- the programme included a 10-week design 'Soft Start' period (RIBA* stage 1+), led by Eric Parry Architects. The 'Soft Start' process followed an iterative process through which the City Police accommodation requirements were scrutinised, analysed and refined through a series of workshops. The Soft Start period was subsequently extended by 12 weeks ahead of obtaining approval from the Capital Buildings Committee to progress to RIBA stage 2.

The report presented to the Capital Buildings Committee in July 2019 confirmed that that the City Police requirements were agreed by the Police Accommodation Working Party in June 2019.

Lesson learned: Robust Options Appraisals and Feasibility Studies should be undertaken prior to undertaking detailed designs

The City Surveyor confirmed that an initial business case examining all strategic options, including the Fleet Street Estate was not produced; the Fleet Street Estate site was the only option possible, given the City geography, third party ownership of

commercial developments, no scope for refurbishment opportunities; other alternative options were initially considered prohibitively expensive or operationally unusable. Whilst failure to fully analyse alternative options may result in poor decision making, the scope for this was limited.

In relation to the Fleet Street Estate site, there were appropriate arrangements in place for scrutinising and approving the preferred option identified from conducting the Feasibility Study; option 8A was selected - to develop the Fleet Street Estate for Police, Courts and Commercial use.

By adopting a 'soft start' approach to determine the design 'Masterplan' and subsequently, the 'Revised Masterplan' for the Fleet Street Estate, this enabled the feasibility of the option selected to be subject to further scrutiny.

Further by progressing the programme through each of each of RIBA concept, developed and technical design stages (stages 2, 3 and 4), will help ensure that the option of developing the Fleet Street Estate continues to be feasible and the design continues to meet City Police requirements.

Lesson learned: The Programme Management Team and other external consultants used should have relevant expertise, skills and knowledge to undertake such a programme

The Project Director was appointed through the City's Consultancy Framework contract with Bloom Procurement. Whilst Officers were satisfied that the Project Director had the requisite experience of large scale, complex construction projects and proven delivery capability there was no appraisal of other options to procure the services of the Project Director. Therefore, the City may not have selected the most effective procurement route for appointing the Project Director, undermining the effectiveness of Programme delivery. However, the City Surveyor has stated that an open recruitment campaign or OJEU process for services would have taken four to six months.

On the basis of review of programme procurement documentation, the audit established that there were arrangements in place to ensure that the, Feasibility Study Consultant and Design Team consultants had the requisite knowledge, skills and experience to help deliver the Programme.

However, the Project update report presented to the Capital Buildings Committee in March 2019 set out that whilst the appointment of the Building Services Engineer and Security Consultant were originally expected to be completed by March 2019, the City's procurement practices were subject to external challenge. Upon interrogation it was established that there was possible validity in the respective challenges (i.e. a possible conflict of interest of the independent specialist appointed to assist in the selection of the Security Consultant and an error embedded in Excel spreadsheets returned by the preferred Building Services Engineer). Consequently, the procurement exercises for these two commissions were declared void; this led to both being re-tendered.

Lesson learned: Procurement process and documentation to be peer reviewed and signed off

Through examination of Programme documentation, the audit established that the City Police have had the opportunity to challenge the option pursued through the following means;

- The Police Authority Board scrutiny of the outcome of the Feasibility Study in May 2018;
- The City Police providing input into the 'soft start' workshops to develop the Programme Masterplan and Revised Masterplan.

Through examination of minutes of the Police Accommodation Working Party, the audit also confirmed that Members have received updates on Fleet Street Estate matter discussed at the meetings of the Capital Buildings Committee and have had the opportunity to raise issues as required.

Lesson learned: The tender documentation issued to procure external consultants and contractors should include a full specification

Through examination of Programme documentation, the audit confirmed that the Project Brief was subject to review and sign off by the City Police to confirm its accuracy before being included in the tender documents used to procure the Design Team.

Lesson learned: There should be an effective programme governance structure in place

Through examination of reports presented to the Members of the Capital Buildings Committee the audit established that a clear programme governance structure was agreed in May 2018.

The Chamberlain's department has expressed concerns over the arrangements for reporting to Members. The concerns related to not providing sufficient time for comments to be made on the reports presented and not always feeding departmental comments into the reports (Recommendation 1).

Lesson learned: Appropriate Specialists should be engaged early on in programmes

The Project Director has taken steps to engage specialists. Through examination of procurement records held, the audit determined that External Industry Experts were on each of the recruitment panels responsible for appointing the Design Team.

Examination of the programme update report presented to Members of the Capital Buildings Committee in January 2019 confirmed that Eric Parry Architects have appointed a specialist sub-consultant RSP Architects to produce the Estate design. Security Engineers have also been appointed to the Design Team.

Lesson learned: There should be adequate arrangements in place for estimating programme costs

On the basis of discussion with the Project Director and examination of reports presented to the Capital Buildings Committee in March and July 2019, the audit established that the costs have been re-forecast frequently, as follows:

- The cost estimates produced as part of the Feasibility Study were examined for reasonableness by the appointed Cost Managers, AECOM;
- The estimated cost of construction was recalculated at the point of completing the Architectural Competition and upon completion of the 'Soft Start' phase;
- The estimated cost of construction was also recalculated upon completion of the extended Soft Start Design period.

However, full programme cost estimates including both project costs and associated capital and revenue costs were not calculated and presented to Members. Consequently, Members may not be able to provide effective oversight of programme finances (recommendation 2).

Lessons learned: Adequate surveys should be undertaken as the programme progresses

Through examination of the Progress Report presented to the Members of the Capital Buildings Committee in March 2019, the audit established that the surveys to progress the design through to the completion of RIBA Stage 2, have been identified. The Capital Buildings Committee approved a budget of £250k for the surveys.

As part of the 'Soft Start' extension period the following surveys were progressed: Measured Surveys, Topological Survey and Archaeological Surveys.

Two Amber Assurance Level recommendations were made as a result of this audit. Both recommendations have been accepted and implemented by the City Surveyor and the Chamberlain.

Committee(s): Police Performance and Resource Management Committee- for information	Date(s): 15 th November 2019
Subject: HMICFRS Inspection Update	Public
Report of: Commissioner of Police Pol 84-19	For Information
Report author: Stuart Phoenix, Head of Strategic Planning	

Summary

This report provides Members with an overview of activity undertaken within the last reporting period, since your June 2019 Committee, in response to reports published by HMICFRS. An overview of the inspection programme is detailed in this report and progress against both existing and new recommendations received is provided for Members' information in Appendix A.

Reports published

6 new national and force reports have been published in the last period.

Force Reports	Date:
Crime Data Integrity inspection 2019	25 th July 2019

National Reports	Date:
Cyber: Keep the light on	24 th October 2019
Shining a light on betrayal: Abuse of position for a sexual purpose	27 th September 2019
Leading Lights: An inspection of the police service's arrangements for the selection and development of chief officers	3 rd September 2019
HMICFRS 2019 inspection of Sussex Police and review of national recommendations for stalking or harassment offences	Force made aware of national implications August 2019
The Poor Relation - The police and CPS response to crimes against older people	17 th July 2019

Inspections undertaken since last report

There have not been any new inspections.

Inspections Due

HMICFRS have advised the Force that an unannounced inspection of child protection arrangements will take place by the end of January 2020.

PEEL¹ fieldwork is not taking place until 2020.

Reports Due for Publication

No new Force level reports are due for publication.

HMICFRS Recommendations Overview

This report details progress against the recommendations from all live inspection action plans, summarised in the table below and detailed fully within Appendix A. There are currently 65 outstanding recommendations of which 20 are from new reports.

There are 23 new greens to report, demonstrating good progress since your June 2019 Committee.

HMICFRS Report title	Number of open recommendations/areas for improvement and status	
	Previous report to your committee [June 2019]	Current report to your committee
<u>New Reports</u>		
Cyber: Keep the light on		5 AMBER
Shining a light on betrayal: Abuse of position for a sexual purpose		1 NEW GREEN 3 AMBER
Leading Lights: An inspection of the police service's arrangements for the selection and development of chief officers		1 AMBER
HMICFRS 2019 inspection of Sussex Police and review of national recommendations for stalking or harassment offences		2 NEW GREEN 2 AMBER
Crime Data Integrity inspection 2019		6 AMBER
The Poor Relation - The police and CPS response to crimes against older people		3 AMBER 2 NEW GREEN
<u>Previous Reports</u>		
PEEL 2018/2019	11 AMBERS	1 NEW GREEN 10 AMBER

¹ Police Efficiency, Effectiveness and Legitimacy

Fraud: Time to Choose	18 AMBERS	3 NEW RED 7 AMBER 8 NEW GREEN
Report on an unannounced inspection visit to police custody suites – City of London Police	22 AMBERS	2 NEW GREEN 1 RED 19 AMBER
Policing and Mental Health - Picking Up the Pieces	1 AMBER 2 WHITE	1 AMBER 1 NEW GREEN 1 WHITE
Understanding the difference: the initial police response to hate crime	1 NEW GREEN 1 AMBER 1 WHITE	1 NEW RED 1 WHITE
Out-of-court disposal work in youth offending teams	5 AMBER	5 NEW GREEN completed
PEEL: Police Effectiveness 2017 – National	1 WHITE	1 WHITE
HMCPSP and HMCIFRS National Report - Living in fear (July 2017)	1 NEW RED	1 NEW GREEN completed
Recommendation Summary	Previous report to your committee [June 2019]	Current report to your committee
New reports	3	6
New Green	0	5
Amber	51	20
White	0	0
Sub-total – New Reports	51	25
Previous reports		
NEW Green	3	18
Amber	7	37
Red	1 [New red]	5 [4 new red]
White	4	3
Sub- Total – Previous Reports	12	63
Total Prior Report Amber/Red/White Recommendations	63 [including 51 from new reports]	65 [including 20 from new reports]

Recommendation

Members are asked to receive and note the contents of this report.

Main Report

Background

1. This report provides Members with an overview of the City of London Police response to HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) continuing programme of inspections and published reports. Since the last report to your Committee there has been 6 new reports published that impact on the Force. Progress with existing recommendations as well as detail of the current inspection programme is provided below for reference.

Current Position

New Reports

2. Six reports has been published since the last report to your Committee in June 2019:

Cyber: Keep the light on

This is a national report focusing on the effectiveness and efficiency of the police response to cyber dependent crime.

Shining a light on betrayal: Abuse of position for a sexual purpose

This report provides a national picture of abuse of position for a sexual purpose in police forces, drawing on the finalised findings from the 29 forces in the first two tranches of our integrated PEEL assessments, and the early findings from the third and final tranche of forces.

Leading Lights: An inspection of the police service's arrangements for the selection and development of chief officers

A national report: HMICFRS and HM Inspectorate of Constabulary in Scotland (HMICS) carried out a joint inspection to determine how effectively police forces select and train candidates for chief officer roles.

HMICFRS 2019 inspection of Sussex Police and review of national recommendations for stalking or harassment offences

A report on Sussex Police that included recommendations for all police forces.

Crime Data Integrity inspection 2019

A force report, HMICFRS grade the City of London Police GOOD, highlighting a number of areas for improvement.

The Poor Relation - The police and CPS response to crimes against older people

A national joint inspection report [Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services and Her Majesty's Crown Prosecution Service Inspectorate] of how the police and the CPS respond to crimes against older people. This report makes a series of recommendations aimed at improving police and CPS practice, and so the service provided to victims.

Inspections undertaken since the last report

3. There have been no new inspections of the Force.

Inspections Due

4. HMICFRS have advised that an unannounced inspection of child protection arrangements will take place by the end of January 2020. An assessment of capacity and capability in this area has been conducted to ensure the Force is fully prepared for whenever the inspection takes place.
5. The annual PEEL fieldwork inspection will not take place until 2020, however data collection requests have been made and submitted to support this inspection. The Force remains in close and regular contact with HMICFRS to ensure it is briefed as their plans develop.

Reports Due

6. No new force level reports are due for publication.

Current status of HMICFRS Recommendations

7. A total of 15 HMICFRS reports have been managed by the Force during the last reporting period; 6 new reports were added to this total.
8. The current status of recommendations is summarised in the table below with full details contained in Appendix A. HMICFRS have not set deadlines for many of these recommendations, so the Force has set itself some challenging targets to drive forward and deliver improvements.
9. There are currently 65 outstanding recommendations of which 20 are from new reports.
10. There are 23 new greens to report.

Current Status of HMIC Recommendations Summary

Recommendation Summary	Previous report to your committee June 2019]	Current report to your committee
NEW Green	3	23
Amber	58 [51 from new reports]	57 [20 from new reports]
Red	1 [new red]	5
White	4	3
Total Amber/Red/White Recommendations	63 [including 51 from new reports]	65 [including 20 from new reports]

NB: Definitions of the RAGW assessments are set out at the beginning of the Appendix.

Conclusion

11. The Force continues to make good progress with implementation of HMICFRS recommendations and areas for improvement, which contributes to business improvement across the organisation.

12. Members are asked to note the report.

Appendix A: Full list of HMIC Recommendations currently being implemented within Force.

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HMICFRS Report Recommendations

Traffic Light Colour	Definition of target achievement
GREEN	The recommendation is implemented
AMBER	The recommendation is subject to ongoing work and monitoring but is anticipated will be implemented
RED	The recommendation is beyond designated deadline or cannot / will not be implemented (rationale required) or
WHITE	The recommendation is not CoLP responsibility to deliver or is dependent upon another organisation delivering a product.

Cyber: Keep the light on

National report by HMICFRS
Published October 2019

This report makes 5 actions for the force – these are currently being considered. The report was published very close to the committee deadline for papers.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> By 1 November 2020, the Home Office, the Cabinet Office, the National Police Chiefs' Council's lead for cyber crime and Coordinator for Economic Crime, the Director General of the National Crime Agency, and interested parties should revise the current police structure for the response to cyber-dependent crime. In doing so they should consider: <ul style="list-style-type: none"> the creation of a national police cyber-dependent crime network; the remit of any such network; 	AMBER	November 2020	This report was published just before the reporting deadline for committee and the force is considering the recommendations and actions required. This will be updated at the next P&RM Committee.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	<ul style="list-style-type: none"> • how the network engages with other law enforcement agencies; and • the tasking and co-ordinating responsibilities that will be required for the network to be effective. 			
2	<u>Areas for improvement</u> Chief constables should evaluate the use that their force makes of cyber specials and volunteers to ensure that they are used effectively.	AMBER	To be set	
3	<u>Areas for improvement</u> With immediate effect, City of London Police should provide the Home Office with details of how the force intends to address the issue of reports being held in 'quarantine' within the Know Fraud system. Furthermore, the force should also identify its proposals to prevent a re-occurrence.	AMBER	To be set	
4	<u>Areas for improvement</u> The National Police Chiefs' Council's lead for cyber crime and Coordinator for Economic Crime should revise the key performance indicators contained within the council's minimum capability standards for force cyber crime units. The revised standards should make clear: <ul style="list-style-type: none"> • the minimum standards for investigation; • the role of regional cyber crime co-ordinators in the recording, management, and review of cyber crime investigations; and • the use of the weekly list provided by the National Fraud Intelligence Bureau to comply with the performance indicators. 	AMBER	To be set	
5	<u>Areas for improvement</u> The National Police Chiefs' Council Coordinator for Economic Crime should review the role the National Economic Crime	AMBER	To be set	

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	Victim Care Units in providing advice and support to victims of cyber-dependent crime.			

Shining a light on betrayal: Abuse of position for a sexual purpose

A national report by HMICFRS

Published September 2019

This report makes 6 recommendations, 1 sub-divided. 4 are for the force, 1 complete and 3 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
Page 67 1	<u>Recommendation</u> All forces that are not yet doing so should immediately comply with all elements of the national guidance on vetting. By July 2020, all forces that haven't yet done so should vet all personnel to the appropriate standard. Forces should also have a clear understanding of the level of vetting required for all posts, and the level of vetting held by all their officers and staff. Forces should make sure all personnel have been vetted to a high enough level for the posts they hold.	NEW GREEN	July 2020	The force is compliant in this area. There is a clear understanding of the level of vetting required for all posts; posts with enhanced vetting are detailed in the vetting SOP. The vetting levels of the workforce are known and held on a database. All personnel are vetted to appropriate levels for their posts – a reconciliation exercise was undertaken in 2017 and since that time appropriate processes have been maintained to ensure compliance.
2	<u>Recommendation</u> By April 2020, the NPCC lead for vetting and the College of Policing should devise a standardised list of information that should be shared between forces when someone transfers from one force to another. As a minimum, we would expect this to include information on performance, sickness, complaints, business interests, notifiable associations and any	WHITE	April 2020	This action is for the NPCC lead for vetting and the College of Policing

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	other corruption intelligence. All forces should then adopt this as soon as reasonably practicable.			
3	<u>Recommendation</u> By September 2020, the NPCC lead for counter corruption and the Home Office should work together with software suppliers to provide a solution to enable all forces to implement proactive ICT monitoring. By September 2020, the NPCC should also work with forces to establish a standardised approach to using the information that ICT monitoring software provides.	WHITE	September 2020	This action is for the NPCC lead for counter corruption and Home Office
4a	<u>Recommendation</u> By April 2020, all forces that haven't yet done so should: <ul style="list-style-type: none"> • record corruption using the national corruption categories; • produce a comprehensive annual counter-corruption strategic threat assessment, in line with the authorised professional practice; and • establish regular links between their counter-corruption units and those agencies and organisations who support vulnerable people. Where forces are yet to implement an effective ICT monitoring system that allows them to monitor desktop and handheld devices, they should do so as soon as reasonably practicable.	AMBER	April 2020	These 2 recommendations are currently being reviewed by the new D/Supt PSD. An action plan is in development.
4b	<u>Recommendation</u> By September 2020, all forces should have completed a review of their use of encrypted apps on police ICT systems to understand the risk they pose and to take any necessary steps to mitigate that risk.	AMBER	September 2020	

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Recommendations & Areas for Improvement		Status	Due Date	Comment
5	<u>Recommendation</u> By April 2020, all forces that haven't yet done so should make sure they have enough people with the right skills to look proactively for intelligence about those abusing their position for a sexual purpose, and to successfully complete their investigations into those identified.	AMBER	April 2020	The force is currently recruiting to its counter corruption unit.

Leading Lights: An inspection of the police service's arrangements for the selection and development of chief officers

A national report by HMICFRS and HMICS [Scotland]

Published August 2019

This report makes 9 recommendations 1 of which is for the force and being progressed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> By 28 February 2020, the College, after consultation with the National Police Chiefs' Council, should draft new regulations that set out the criteria chief constables in England and Wales must apply and the process they must adopt when selecting candidates for SPNAC. The regulations should: <ul style="list-style-type: none"> • be based on the principles set out in the College of Policing's existing guidance on chief officer selection: merit, fairness and openness; • emphasise that SPNAC is open to officers of superintendent rank; and • be suitable for adoption [by order of the relevant oversight bodies] in Police Scotland, the Police Service of Northern Ireland and national policing organisations. 	WHITE	February 2020	This action is for the College of Policing

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Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<u>Recommendation</u> By 31 May 2020, the College should provide: <ul style="list-style-type: none"> • clear information to all potential candidates about the nature of assessments within SPNAC; • access to support and advice which will enable all potential candidates to prepare adequately for SPNAC; and • improved information about the supplementary arrangements for under-represented groups. 	WHITE	May 2020	This action is for the College of Policing
3	<u>Recommendation</u> By 28 February 2020, the College should abolish the SPSAC and instead use all SPNAC assessment exercises when assessing senior police staff, so that warranted and non-warranted candidates are judged on the same basis.	WHITE	February 2020	This action is for the College of Policing
4	<u>Recommendation</u> By 31 December 2019, the College should widen the membership of the professional reference group to include individuals with professional backgrounds in leadership development in other sectors, and experts with an academic and research background, including those who can provide an international perspective.	WHITE	December 2019	This action is for the College of Policing
5	<u>Recommendation</u> By 31 March 2020, the College should commission a truly independent evaluation of SPNAC, to be carried out on a routine basis.	WHITE	March 2020	This action is for the College of Policing
6	<u>Recommendation</u> When reconstituted, the professional reference group should commission a thorough and truly independent review of the SCC. The College should use the outcome to redesign the course as part of a wider programme of continuous	WHITE	No date set by HMICFRS	This action is for the professional reference group when reconstituted and the College of Policing.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	professional development. The redesign process should also address the points raised in this inspection report.			
7	<p><u>Recommendation</u></p> <p>By 1 September 2020, the College and the National Police Chiefs' Council should design and operate a new, comprehensive continuous professional development framework for chief police officers and staff that reflects the range of chief officer roles across the United Kingdom and encompasses development opportunities within and beyond policing. It should include specified standards of accreditation and timelines for completion and be supported by a guiding hand to help officers make the best development and career choices.</p>	WHITE	September 2020	This action is for the College and the National Police Chiefs' Council.
8	<p><u>Recommendation</u></p> <p>By 31 July 2020, the College, with support from the National Police Chiefs' Council, HMICFRS, HMICS and police forces, should establish and begin operation of a national workforce planning function for all chief officer posts in the United Kingdom. The function should, as a minimum, include:</p> <ul style="list-style-type: none"> • the maintenance of a skills, competencies and career-history database on eligible candidates; • the maintenance of similar information about the current membership of chief officer teams; • the creation of lists of candidates who fit specific vacancies; • an executive search function to advise forces on candidates who would best complement their existing teams; and • a career support facility to advise candidates on roles and other development opportunities that would help meet their career aspirations. 	AMBER	July 2020	<p>This action is mainly for the College but will require the support of National Police Chiefs' Council, HMICFRS, HMICS and police forces. However, the force can progress collating skills, competencies and career histories of the current chief officer team ahead of any request from the College of Policing.</p> <p>Strategic Development has liaised with Organisational Development and HR to progress.</p>

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Recommendations & Areas for Improvement		Status	Due Date	Comment
9	<u>Recommendation</u> By 1 September 2020, the Home Secretary, Scottish Ministers and the Northern Ireland Policing Board should make regulations / directions: <ul style="list-style-type: none"> • requiring that an officer would be eligible to apply for a chief constable position only if they had served for at least two years in another organisation at chief officer or equivalent level; and • limiting the period of time for which a chief officer post can be filled on a temporary basis to a maximum of 12 months. 	WHITE	September 2020	This action is for the Home Secretary, Scottish Ministers and the Northern Ireland Policing Board

HMICFRS 2019 inspection of Sussex Police and review of national recommendations for stalking or harassment offences

A force report by HMICFRS. Published April 2019 but all forces made aware August 2019

Whilst this is an inspection of Sussex Police a number of *national* recommendations and areas for improvement were made for forces to comply with.

This report makes 8 areas for improvement for the Police. 4 are relevant to the City of London Police; 2 are complete, 2 are in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	Cause of concern We are concerned that police forces are dealing with breaches of orders in isolation, and are not recognising or properly addressing the wider patterns of victimisation. As a result, forces might not be adequately assessing the risks to some victims, and might not be appropriately investigating and prosecuting cases. <u>Recommendation</u> Within six months, chief constables should ensure that forces record stalking or harassment crimes if appropriate when victims report breaches of orders.	NEW GREEN	February 2020	All cases of this nature are dealt with by Public Protection Unit who have confirmed that they deal with the suspect for the breach in addition to any criminal offences. The Public Protection Unit protection responsibilities extend to stalking, harassment and domestic abuse – any breaches of orders are identified at an early stage in investigations

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Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<u>Recommendation</u> Within six months the National Police Chiefs' Council (NPCC) lead and the CPS lead should consider whether they can do more to inform police officers and lawyers of the importance of treating breaches of orders as evidence of a wider pattern of offending, and when and as further evidence of stalking or harassment.in what circumstances officers and lawyers should treat this as further evidence of stalking or harassment.	WHITE	February 2020	This action is for National Police Chiefs' Council (NPCC) lead and the CPS lead
3	<u>Recommendation</u> Within six months chief constables should ensure that officers are aware of the importance of treating breaches of orders, where appropriate, as part of a wider pattern of offending, and ensure that force policy and guidance helps officers to do this.	AMBER	February 2020	Public Protection Unit responsibilities extend to stalking, harassment and domestic abuse – relevant SOPs are currently being reviewed to ensure they are fit for purpose in respect of 'breaches of orders'.
4	Cause of concern We remain concerned that there is no single definition of stalking that all police forces and government departments have adopted. As a result, police forces are not consistently identifying stalking, and are not protecting victims as a result. <u>Recommendation</u> We recommend that within six months the NPCC lead for stalking and harassment reviews whether all police forces should adopt one single definition of stalking, and that the Home Office works with the NPCC lead and partners nationally to review whether a cross-government definition of stalking could and should be adopted.	WHITE	February 2020	This action is for NPCC lead for stalking and harassment.
5	Cause of concern We are concerned that forces have not properly implemented the changes made to the Home Office Counting Rules for Recorded Crime, as they relate to malicious communication offences, stalking or harassment. It is possible that forces	NEW GREEN	November 2019 to the NPCC	This action is for NPCC lead for stalking and harassment, but will require a response by the force.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	<p>might not be properly assessing the risks to victims and the likelihood of repeat offending.</p> <p><u>Recommendation</u> We recommend that within three months the NPCC lead for stalking and harassment writes to chief constables to reinforce the importance of making sure that crimes which forces are recording as malicious communications are properly assessed, to see if forces should also be recording them as stalking or harassment.</p>			<p>The Force Crime and Incident Registrar will be including the recording of malicious communications within their audit plan.</p> <p>An initial audit has been conducted and identified a small number of missed malicious communications crimes since April 2019.</p>
	<p>Cause of concern We are concerned that forces are not protecting victims of harassment as well as they could, because they are not using injunctions to prevent nuisance and annoyance consistently.</p> <p><u>Recommendation</u> We recommend that within six months the NPCC lead for stalking and harassment reviews the use of injunctions to prevent nuisance and annoyance to protect harassment victims. Following this review, if necessary the NPCC lead should write to chief constables to ensure that forces routinely consider such powers when dealing with victims of harassment.</p>	WHITE	February 2020	This action is for the NPCC lead for stalking and harassment
7	<p>Cause of concern We are concerned that police forces do not use the power of entry and search effectively, and therefore stalking investigations are not as thorough as they could be.</p> <p><u>Recommendation</u></p>	WHITE	November 2020	This action is for the NPCC lead for stalking and harassment

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	<p>We recommend that within three months the NPCC lead for stalking and harassment reminds chief constables of the need to ensure that:</p> <ul style="list-style-type: none"> Officers are aware of the powers of entry and search for stalking, and use them appropriately; and Forces compile adequate records of these searches for audit and compliance purposes. 			
8	<p><u>Area for Improvement</u></p> <p>Within three months the NPCC lead for stalking and harassment should remind chief constables that they should regularly monitor compliance with the national stalking protocol, and ensure that suitable governance arrangements are in place for them to do so.</p>	AMBER	November 2019	<p>This action is for the NPCC lead for stalking and harassment and Chief Constables</p> <p>Although the AFI is for the NPCC Lead, the Force has taken the requirement on board and work is in progress to ensure the Public Protection Unit and Administration of Justice produce a joint report for Crime Standards Board oversight.</p>

Crime Data Integrity inspection 2019

A force report by HMICFRS, published August 2019

This report makes 6 areas for improvement for the Police, these are in progress

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><u>Area for Improvement</u></p> <p>The force should immediately improve crime recording processes, to make sure it records crimes within 24 hours as required by the national crime recording standard</p>	AMBER	February 2020	<p>Crimes are now raised within Control from the Computer Aided Despatch (CAD) incident record, this went live 24th June 2019. Timeliness of crime recording is monitored and reported to Crime Standards Board.</p> <p>NCRS requires crime to be recorded within 24 hours, the force has improved its position to 83% from 75% at the time of inspection and is being monitored. This is expected to increase further as the force</p>

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Recommendations & Areas for Improvement		Status	Due Date	Comment
				embeds a process which reconciles City crimes from force incidents records [CAD] and the MPS crime system. Once this is demonstrated to be working, this AFI will be GREEN. Numbers and timeliness of recording Modern Slavery have been reviewed – no under recordings has been identified and volume is low.(Only 2 crimes YTD)
2	<u>Area for Improvement</u> The force should immediately improve officer and staff understanding of the correct use of the N100 classification	AMBER	February 2020	N100 audits are being undertaken to ensure the appropriate numbers are being recorded. Next steps: Specific refresher training is in development with regard to reported incidents of rape [N100] ¹ .
3	<u>Area for Improvement</u> The force should immediately improve its standard of violent crime cancellation decisions	AMBER	February 2020	Force Resolution Centre staff have been trained to be able to cancel lower levels crime of this type where appropriate, including the requirement inform the victims.
4	<u>Area for Improvement</u> The force should immediately improve how often it informs victims when it has decided to cancel or transfer their crimes to another force	AMBER	February 2020	More serious crimes can only be cancelled by the DCI crime or the Force Crime and Incident Registrar who are aware of this requirement. Next steps: Audits are scheduled in the next reporting period to ensure compliance, the results of which will determine if this AFI can be classified as delivered.
5	<u>Area for Improvement</u> The force should immediately improve its collection and analysis of equality data through its crime reporting and recording systems	AMBER	February 2020	It has been confirmed that the required information can be collected on force system. Next steps: Officers and staff are to be briefed on the requirement and how to record on the force system.

¹ N100 - A record created to describe why reported incidents of rape or attempted rapes, whether from victims, witnesses or third parties, have not been immediately recorded as a confirmed crime. This can include where additional information confirms the rape did not occur, or where the rape occurred in another force area and was therefore transferred to the relevant force to record and investigate.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
				Thereafter, the Performance Information Unit will analyse the data.
6	<u>Area for Improvement</u> The force should immediately improve its use of cannabis warnings, penalty notices for disorder and community resolutions, to make sure it only issues them in accordance with national guidance.	AMBER	February 2020	In response to the HMICFRS report refresher training has been developed and rollout commenced late September 2019. Next steps: Compliance with national guidance will be evidenced by audits undertaken by the Force Crime and Incident Registrar and reported to the Crime Standards Board.

The Poor Relation - The police and CPS response to crimes against older people

National report by HMICFRS, published July 2019

This report makes 23 recommendations, 5 of which are for force – 2 completed and 3 in progress

Recommendations & Areas for Improvement		Status	Due Date	Comment
8	Cause of concern The police don't consistently assess the needs of victims as set out in the relevant codes of practice and so the needs of victims aren't always met. <u>Recommendation</u> Within six months, chief constables should make sure that victim needs assessments are always completed.	AMBER	January 2020	The forces operates a opt out process in referring victims to victim support – this is the preferred option by HMICFRS The offering of victim needs assessments is part of the qualitative dip samples undertaken by the Crime Directorate. Next steps: The results of recent dip samples will be examined to ensure that all necessary action is being taken.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
Page 78	<p>Cause of concern Chief constables don't understand well enough the current demand for adult safeguarding arrangements, and haven't considered the likely future demand and the implications for forces.</p> <p><u>Recommendation</u> Within three months, chief constables should conduct analysis of the current and future demand for adult safeguarding, including the gap in knowledge that may exist from those cases where referrals aren't made because of errors or omissions. This analysis should be incorporated into force management statements (FMSs).</p>	NEW GREEN	October 2019	<p>All adult safeguarding requests are received by the Public Protection Unit as public protection notices [PPN] from the force's crime recording system (Niche).</p> <p>Numbers total circ. 50 per month and are assessed for appropriate next steps including the option of referral to local authority safeguarding teams.</p> <p>Demand currently remains stable and is monitored at the Vulnerability Working and Steering Groups as part of its dashboard. The public protection unit attend the force's daily crime meeting, thus providing an opportunity to spot errors / omissions in PPN referrals.</p> <p>The HMICFRS report references forces' needs to understand the demand local authorities make under section 42 of the Care Act 2014. For the City these are extremely rare – demand is fully understood by the force.</p> <p><i>[The Care Act 2014 (Section 42) requires that each local authority must make enquiries, or cause others to do so, if it believes an adult is experiencing, or is at risk of, abuse or neglect. An enquiry should establish whether any action needs to be taken to prevent or stop abuse or neglect, and if so, by whom.]</i></p> <p>Demands upon the force are included within the Force Management Statement.</p>
	<p>10 Cause of concern Some victims may not be receiving support services, and some support services don't work as well as they could. This is because the police don't always refer victims when they</p>	AMBER	January 2020	<p>The HMICFRS Fraud report highlights the force's initiative the National Economic Crime Victim Care Unit as a good example of law enforcement attempting to identify and respond to vulnerability.</p>

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	<p>should, support services don't have ready access to police information, and witness care arrangements are sometimes provided separately.</p> <p><u>Recommendation</u> Within six months, chief constables should work with police and crime commissioners and their mayoral equivalents, and other relevant organisations, to review whether victim support services can be provided in a better way.</p>			<p>A significant number of these victims will be older people.</p> <p>With regard to non-economic crime victims: The force undertakes dip samples to identify learning which is then reported to the Crime Standards Board, these dip samples include qualitative checks on the service provided.</p> <p>Next steps: Victims code of practice compliance and MG2 special measures submissions are to be examined to ensure appropriate standards are being achieved.</p>
Page 79	<p>Cause of concern Some adults who need safeguarding are being put at risk because the police aren't always referring cases to partner organisations, and there are no effective measures to ensure that referrals have been made.</p> <p><u>Recommendation</u> Within three months, chief constables should ensure that adult safeguarding referrals are always made when appropriate, with effective processes in place to make sure this happens. The NPCC lead for adults at risk should advise chief constables as to how this is best achieved.</p>	NEW GREEN	October 2019	<p>All adults safeguarding referral are handled by the force's Public Protection Unit. Demand levels are known and average 50 per month.</p> <p>Opportunities to identify omissions are covered by the Public Protection Unit's attendance at the daily crime meeting.</p>
17	<p><u>Area for improvement</u> Within six months, chief constables should find good ways to assess the current demands on the police made by older people. These assessments should include a prediction of future changes in demand, account for the work of other organisations, and be incorporated into FMSs.</p>	AMBER	January 2020	<p>Next steps: An analysis of all crime types, banded by the age of victims has been commissioned. This will enable the force to track trend changes</p>

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PEEL 2018/2019

A national report by HMICFRS, published May 2019

This report makes 11 areas for improvement for the force, 1 is complete 10 are in progress

Recommendations & Areas for Improvement		Status	Due Date	Comment
Page 80	<p><u>Area for Improvement</u></p> <p>The force should improve its use of its crime-recording and management system to better manage its case files and investigative processes.</p>	AMBER	<p>No deadline set by HMICFRS</p> <p>December 2019 set to align with the next inspection</p>	<p>The following actions have been undertaken:</p> <ul style="list-style-type: none"> <i>Gatekeeper</i> – this position has been re-established to verify the completeness and quality of files before there submission to the Administration of Justice department for processing. Advice and feedback is provided to officers to enhance their knowledge/practises. <i>Weekly Offender Management Meeting</i> – Chaired by the DCI Crime this group manages performance levels of ‘All outstanding suspects and warrants’. Issuing corrective actions to be taken and guidance to supervisors overall numbers of outstanding suspects is falling. <p>Task to be completed:</p> <ul style="list-style-type: none"> A review of discontinued cases where the suspect has not been identified and the victim does not support the prosecution need to take place. Once complete, this will be GREEN.
	<p><u>Area for Improvement</u></p> <p>The force should implement a process to get feedback from vulnerable victims.</p>	AMBER	<p>No deadline set by HMICFRS</p> <p>December 2019 set to</p>	<p>HMICFRS recognised in their report that the force has a process to collect feedback from domestic abuse victims and victims with mental health concerns [although responses are rare]. However the identified gap is that feedback is not sought from other vulnerable victims. This feedback process is administrated by the Independent Domestic Abuse Advisor [IDVA], currently a part time vacancy exists which is</p>

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Recommendations & Areas for Improvement		Status	Due Date	Comment
			align with the next inspection	being recruited to. The original successful applicant failed vetting and so a new process has commenced.
	<p><u>Area for Improvement</u></p> <p>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.</p>	AMBER	<p>No deadline set by HMICFRS</p> <p>December 2019 set to align with the next inspection</p>	<p><u>Tasks</u></p> <ul style="list-style-type: none"> • City schools to sign-up to Op Encompass². • Dedicated Safeguarding leads within each school to be identified. • Schools to be trained to use the system [Op Encompass] by the Public Protection Unit. <p><u>Current Status</u></p> <p>At the time of the inspection HMICFRS were aware of the force's plans to implement Op Encompass; sharing information with schools in the City of London in relation to children affected by domestic abuse incidents.</p> <p>Formal invites to schools to join the scheme have been sent following prior engagement.</p> <p>Training is planned to be delivered to schools in November 2019 coinciding with a Domestic Violence Campaign.</p> <p>MPS plans for implementation are phased, initially starting with individual boroughs [child lives and attends school in the same area] and then progressing to cross boarder [child lives in one borough but attends school in another or the City].</p> <p>The speed of MPS implementation will impact the force's ability to report [to schools] a child living in the City but attending school in the MPS area.</p>

² Operation Encompass is supporting children through key adults. Operation Encompass is the reporting to schools before 9am on a school day when a child or young person has been involved or exposed to a domestic abuse incident the previous evening.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
4	<p><u>Area for Improvement</u></p> <p>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.</p>	NEW GREEN	<p>No deadline set by HMICFRS</p> <p>December 2019 set to align with the next inspection</p>	<p>At the time of inspection the force was recruiting to the Lifetime Offender Management Team, which subsequently went live in May 2019. These posts have now been filled.</p> <p>Working practises have been established. Existing ancillary orders in this area have been reviewed and a monitoring regime established. SOPs for Lifetime Offender Management, Integrated Offender Management and Ancillary Orders have been produced and published on the force intranet.</p>
	<p><u>Area for Improvement</u></p> <p>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.</p>	AMBER	<p>No deadline set by HMICFRS</p> <p>December 2019 set to align with the next inspection</p>	<p>The force has requested a peer review, this to be conducted by the National County Lines Co-ordination Centre 20th and 21st November 2019 – this will inform future actions.</p> <p>Awareness in force of how to recognise county line issues continues.</p>
6	<p><u>Area for Improvement</u></p> <p>The force needs to address the deficit it has identified in its medium-term financial plan.</p>	AMBER	<p>No deadline set by HMICFRS</p> <p>December 2019 set to align with the next inspection</p>	<p>Since that time considerable efforts have been made by the force and the City of London Corporation to establish a savings plan for 2018/2019 and secure additional funding. This has resulted in a balanced budget for 2019/2020.</p> <p>Work continues; a revised medium term financial plan is scheduled for submission to the Police Authority Board November 2019, this will identify any projected deficits which need addressing.</p>

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Recommendations & Areas for Improvement		Status	Due Date	Comment
7	<u>Area for Improvement</u> The force should ensure that effective external scrutiny takes place in relation to its use of force.	AMBER	No deadline set by HMICFRS December 2019 set to align with the next inspection	Both of these areas are scrutinised by the Police Authority Board with reports due on both Use of Force (as part of a Custody update) and stop and search, at its November 2019 meeting. Considerable efforts have been made to attract new members to the newly formed Force Community Scrutiny/ Independent Advisory group and an Introductory day took place on the 11 th June 2019. The first meeting of the group took place on the 4 th September 2019, but these topics were not on the agenda. Dates are currently being considered for future meetings at which data will be presented and discussed.
	<u>Area for Improvement</u> The force should ensure that effective external scrutiny takes place in relation to its stop and search powers.	AMBER	No deadline set by HMICFRS December 2019 set to align with the next inspection	
9	<u>Area for Improvement</u> The force should extend its unconscious bias training to all its workforce.	AMBER	No deadline set by HMICFRS December 2019 set to align with the next inspection	A training package has already been developed, a timetable set commencing late November 2019 Completion of training by the workforce will be monitored and reported in force.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
10	<u>Area for Improvement</u> The force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up-to-date and include current data.	AMBER	No deadline set by HMICFRS December 2019 set to align with the next inspection	These documents have been reviewed for 2018/2019 and will be re-evaluated for 2019/2020.
	<u>Area for Improvement</u> The force should ensure that its counter-corruption unit: <ul style="list-style-type: none"> • 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. 	AMBER	No deadline set by HMICFRS December 2019 set to align with the next inspection	HMICFRS has raised issues relating to staffing levels and monitoring of force IT. The force made a growth staff bid to Resources Allocation Sub [2 nd May 2019] which was agreed – recruitment process was run internally, however no candidates were appointed and the force has now advertised externally to fill the posts. The force has identified software that enables more effective monitoring of force IT – a capital bid is being prepared.

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Fraud: Time to Choose

A national report by HMICFRS, published April 2019

This report makes of which 13 recommendations and 5 areas for improvement for the police. 8 are complete and 10 are in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should publish a timetable for implementing the revised Know Fraud system, making clear	NEW RED	September 2019	A letter has been drafted to all forces addressing this action. The decision to release the letter will be taken by the Programme Board, membership of which includes the contractor providing Know Fraud.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	which services are to become available at each stage of implementation and thereby enabling forces to make use of each service as early as practicable. The use made of the system by police forces should be monitored and evaluated to identify best practice.			If approved this letter will be issued late November 2019. This is a complex issue and a delay has been experienced owing to the number of stakeholders involved.
2	<u>Recommendation</u> By 31 March 2020, the National Police Chiefs' Council Coordinator for Economic Crime and chief constables should ensure that forces have processes in place to accurately and efficiently report fraud outcomes to the National Fraud Intelligence Bureau.	AMBER	March 2020	New guidance was issued to forces late September 2019. The production of monthly exception report [these support accuracy and efficiency] have entered the testing stage help to hold force to account. Next Steps A database to monitor outcomes against disseminations is being developed.
3	<u>Recommendation</u> By 31 August 2019, the Economic Crime Strategic Board should extend its remit to include all forms of fraud against individuals and businesses, not just serious and organised fraud.	GREEN	August 2019	This action is for the Economic Crime Strategic Board
4	<u>Recommendation</u> By 30 September 2019, the Home Office should publish information concerning its agreement with City of London Police to act as the national lead force for fraud. The published information should include (as a minimum) descriptions of: <ul style="list-style-type: none"> the aims and objectives of the agreement; the funding arrangement; accountability and governance processes; and City of London Police's performance against the agreement. 	GREEN	September 2019	This action is for the Home Office, however the force is an active participant. The Home Office have published as required.
5	<u>Recommendation</u> The National Police Chiefs' Council (NPCC) Coordinator for Economic Crime, in consultation with the Home Office and the Director General of the National Economic Crime Centre,	AMBER	March 2020	A Strategy has been developed; consultation has taken place with PCCs, NECC and other priority stakeholders.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
Page 86	<p>should develop a national policing strategy for fraud and, by 31 March 2020, secure its approval by the NPCC for adoption by all police forces. The strategy should:</p> <ul style="list-style-type: none"> • make clear the roles and responsibilities of police forces and regional organised crime units; • define the relationship between City of London Police as the national lead force, the National Crime Agency (in particular the National Economic Crime Centre) and other relevant bodies, seeking to ensure that their respective roles and responsibilities complement each other and avoid duplication; and • define how fraud intelligence will be developed, disseminated and put to effective use by police forces and the National Fraud Intelligence Bureau. <p>The implementation arrangements for the strategy should include clear communication and review processes.</p>			<p>It is anticipated this will be sent to all forces early November 2019</p> <p>Next Steps</p> <p>The Strategy is to be published and governance is to be established for implementation.</p>
	<p><u>Recommendation</u></p> <p>With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime, working with the College of Policing, should take responsibility for identifying, evaluating and disseminating best practice advice on the police response to fraud.</p>	NEW GREEN	March 2020	<p>A number of initiatives have been delivered:</p> <ul style="list-style-type: none"> • The establishment of the Economic Crime Hub • The initiation of engagement events • International benchmarking has been developed • There is an ongoing programme to identify and share best practise in victim care
	<p><u>Recommendation</u></p> <p>By 31 March 2020, the National Police Chiefs' Council Coordinator for Economic Crime should carry out an evaluation of two National Fraud Intelligence Bureau products: monthly victim lists and six-monthly force profiles. The evaluation should include:</p> <ul style="list-style-type: none"> • consulting with police forces to establish the uses to which these intelligence products are put; and 	NEW GREEN	March 2020	<p>Force Profiles:</p> <p>In consultation with forces, the following changes have been implemented:</p> <ul style="list-style-type: none"> • 6 monthly force profile have become annual for fraud and cyber – these profiles will focus on the intelligence picture as opposed to the current statistical information. • An interactive dashboard for forces has been developed, this to be updated monthly.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	<ul style="list-style-type: none"> identifying any opportunities to improve the products' utility or reduce the burden on the National Fraud Intelligence Bureau in compiling them. 			<p>Victim Lists: Following feedback from and consultation with forces, the decision has been taken to increase the frequency of disseminating the Victim Lists to forces.</p> <p>From June 2019 forces will receive information of victims of fraud residing in their force area on a weekly basis. This move aligns the dissemination frequency of fraud victims with cyber victims. Vulnerability is highlighted on the victim list. Victims aged 17 and under will be disseminated to forces on receipt.</p>
Page 87 8	<p><u>Recommendation</u> By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should issue guidance to police forces on how to:</p> <ul style="list-style-type: none"> accurately record and report on National Fraud Intelligence Bureau 'disseminations for enforcement' to ensure consistency and clarity for fraud-recording processes (the guidance should reassert the requirement in the Home Office Counting Rules for forces to provide the case number, the crime numbers, the suspect details and the outcome details for each such dissemination); determine their response to National Fraud Intelligence Bureau disseminations for enforcement, ensuring consistency and clarity for victims of fraud; and ensure that, when a force decides not to investigate, or not to continue an investigation, the victim is provided with a clear written explanation of the rationale for that decision. 	NEW GREEN	September 2019	<p>These recommendations will in part be met by the force's response to recommendation 6 above.</p> <p>In addition: Dissemination and calls for services guidance has been issued in late September 2019. This follows a series of engagement and workshops</p>
9	<p><u>Recommendation</u> By 30 September 2019, chief constables should publish their force's policy for responding to and investigating allegations of</p>	NEW RED	September 2019	<p>A draft policy has been produced and is currently at consultation. Internal and external communications are planned following signoff.</p>

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	fraud (in relation to both calls for service and National Fraud Intelligence Bureau disseminations for enforcement).		Now December 2019	
10	<u>Recommendation</u> With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime, when issuing to police forces advice on fraud protection that is to be given to the public (including alerts and campaigns), should take responsibility for evaluating the effectiveness of how that advice is given to the public and the effectiveness of the advice.	AMBER	March 2020	Steps have been taken towards establishing a Police National Fraud PROTECT network similar to the Police National Cyber PROTECT network operating at a national, regional, and local level. An additional resource has been brigaded into the NFIB PROTECT Team and funding opportunities explored to develop this capability. The immediate ambition for the Fraud PROTECT strand will be to: <ul style="list-style-type: none"> • Create a virtual network of Force Fraud PROTECT Officers • Develop a mechanism to measure output and impact e.g. Engagement Impact Survey(s) • Review and refresh the Fraud PROTECT Implementation Plan Review of national coordination of Fraud PROTECT and targeted PROTECT messaging through Action Fraud.
11	<u>Recommendation</u> By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should issue guidance to police forces in relation to fraud-related calls for service as described in the Home Office Counting Rules. The advice should make clear to forces the circumstances in which they are expected to intervene and the circumstances in which they may refer the case direct to Action Fraud. The advice should also make clear how: <ul style="list-style-type: none"> • responses to reports of fraud may adequately meet the needs of victims; • vulnerable victims should be identified and dealt with appropriately; and • reports of fraud should be efficiently referred to Action Fraud. 	NEW GREEN	September 2019	The required guidance has been produced and circulated to forces, comprising of 2 guides: Calls for Services and Vulnerable Victims. The force has also engaged with the Home Office single online home project to ensure fraud reporting is compatible with best practice and policy.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
12	<u>Recommendation</u> By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should redesign the National Fraud Intelligence Bureau dissemination for enforcement documentation to make it easier for recipients to interpret and use.	NEW GREEN	September 2019	Following consultations with forces a revised disseminations template has been produced and issued to NFIB supervisors and crime reviewers mid-October 2019. This template was accompanied with guidance.
13	<u>Recommendation</u> With immediate effect, the Director General of the National Crime Agency, in consultation with the National Police Chiefs' Council Coordinator for Economic Crime, should ensure that the tasking powers of the National Crime Agency are used effectively in the case of serious and organised fraud.	WHITE		This action is for the Director General of the National Crime Agency, however, the escalation process is now ready for circulation. CoLP continues to engage with National Crime Agency tasking to ensure Fraud is appropriately represented. An escalation process has been introduced for policing and CoLP is represented in ongoing work to develop an effective national tasking process for serious and organised crime.
14	<u>Recommendation</u> With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime should: <ul style="list-style-type: none"> carry out (and subsequently evaluate) a campaign to raise the public awareness of the existence and role of Action Fraud; and provide chief constables with a description of the role of Action Fraud for uploading to force websites. 	AMBER	March 2020	A draft campaign strategy has been produced and shared with the Home Office which has agreed a multi-agency approach. The campaign is not expected to start until March 2020. Advertising space to support the campaign messaging is secured, including signage at televised sports events and radio adverts.
15	<u>Recommendation</u> With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime should take steps to remedy the absence of published performance indicators at Action Fraud. As soon as practicable, performance indicators should be set in relation to, for example, call handling waiting times and abandonment rates, online reporting and victim	NEW GREEN	August 2020	Performance indicators have been developed and published [on the Action Fraud website] in line with this recommendation. A standard of service has also been published to inform the public.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	satisfaction levels. Thereafter, information on performance against those indicators should be published.			
16	<u>Recommendation</u> By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should provide guidance to Action Fraud and chief constables. This is to ensure that, promptly on reporting a fraud, victims are provided with explanations of: <ul style="list-style-type: none"> • the role of Action Fraud; • the process by which their fraud report will be considered for assessment or referral to the police (or other law enforcement agency) by the National Fraud Intelligence Bureau; • how to obtain an update on the progress of their case; • how, following referral from the National Fraud Intelligence Bureau, the decision on whether and how to investigate rests with the police (or other law enforcement agency); and • the options open to victims of fraud to seek civil redress as an alternative (in cases where criminal investigations are not carried out or do not lead to convictions). 	NEW RED	September 2019 Now December 2019	The role of Action Fraud has been published together with a standard of service and includes options open to victims for civil redress. Key performance indicators are also published on the Action Fraud website. Next steps A step by step guide is in production.
17	<u>Area for Improvement</u> Chief constables should improve the way their force uses the National Fraud Intelligence Bureau monthly victim lists to identify and support vulnerable victims and others who require additional support.	NEW GREEN	March 2020	Existing processes and arrangements have been reviewed and a SOP published which support this process. Victims list for the City are small in number and appropriate mechanisms are already in place to provide appropriate support.
18	<u>Area for Improvement</u> Chief constables should ensure their forces improve the identification and mapping of organised crime groups in which the principal criminality is fraud.	AMBER	March 2020	The force already identifies and maps organised crime groups. Identification and mapping are discussed at the force Serious and Organised Crime Board. Next steps: A City and National Lead Force case acceptance policy has been produced – internal publication is pending.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
19	<u>Area for Improvement</u> Chief constables should ensure that fraudsters are included among those considered for serious organised crime 'prevent' tactics, including by local strategic partnership boards and through integrated offender management processes.	AMBER	March 2020	<p>Fraudsters are discussed at the force Serious and Organised Crime Board. Organised crime prevent tactics are included with the fraud case acceptance and review policy – publication pending.</p> <p>The force has a Lifetime Offender Management Unit - its' supervisor provides Fraud SIOs/Lead investigator with an integrated offender management and lifetime offender management options - ancillary orders are being pursued as a result.</p> <p>The Lifetime Offender Management manager now has a standing invitation to the Economic Crime Directorate Tasking meeting to ensure that engagement is at the earliest stage.</p>
20	<u>Area for Improvement</u> Chief constables should increase their force's use of ancillary orders against fraudsters.	NEW GREEN	March 2020	<p>All ancillary orders have been reviewed.</p> <p>The Lifetime Offender Management team has presented their role, capacity and capability to every ECD team via regular team meetings.</p> <p>The Lifetime Offender Management manager now has a standing invitation to the ECD Tasking meeting to ensure that engagement is at the earliest stage.</p> <p>Opportunities for ancillary orders are fully explored.</p>
21	<u>Area for Improvement</u> Chief constables should ensure that their force complies with the Code of Practice for Victims of Crime when investigating fraud.	AMBER	March 2020	<p>Existing arrangements and processes have been reviewed; the HMICFRS report recognised the CoLP has developed a victim contract strategy for use in complex cases and that some other force and regions have adopted it as good practise.</p> <p>Next steps:</p> <p>The Economic Crime Victim Code of Practice is currently being refreshed.</p>

City of London Police – Joint inspection of police custody

A national joint report by HMI Prisons and HMICFRS, published March 2018

This report makes 1 recommendation and 21 areas for improvement for the police. 2 actions are complete, 20 are in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> The force must take immediate action to ensure that all children and vulnerable adults have an appropriate adult present when taking fingerprints, photographs and DNA.	NEW GREEN	December 2019 to align with the HMICFRS return visit	Both the Juvenile Detainees SOP and the Fingerprints and Non Intimate Samples SOP have been reviewed and updated. All custody staff have been briefed and advised by email of their responsibility to compile with PACE and past practise is no longer acceptable. The requirement of recommendation within Custody Refresher training. A specific and relevant question has been included within the dip sample template as part of the safeguarding review.
2	<u>Area for Improvement</u> The force should ensure that there is sufficient oversight of how minimum staffing levels are maintained in the custody suite, and the level of overtime in use to achieve these.	AMBER	December 2019 to align with the HMICFRS return visit	A process is in place to monitor and review the availability of fully accredited staff. Overtime monitoring has been enhanced and authorisation changed to the Custody Manager from the Response Group Inspectors. An alternate process for allocation of resources has been implemented and is controlled by the Custody Inspector. A dedicated Custody staffing group is being established on a 3 month rolling basis sourced from Response Groups, alongside Dedicated Detection Officers and Custody Goalers to improve both experience and skills and to better control cover and requirement for over time. Skills records have been reviewed and are being maintained. Tasks to be progressed: A review will take place to ensure these revised processes are working as required.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
3	<u>Area for Improvement</u> The force should address the unsatisfactory conditions that some detainees experience in the suite, especially those detained for long periods, and ensure that the facilities and arrangements for detainees with disabilities and those with limited mobility are suitable.	AMBER	December 2019 to align with the HMICFRS return visit	Adaptations and introduction of a 'hatched' 'no loitering area' in reception area are programmed to be delivered during the Suite close down for deep cleaning due in November 2019. Van docking arrangements are now formalised. Tasks to be progressed: Associated requirements to be captured for the new custody facilities. New design guidelines published by Home Office fed into the Accommodation Programme.
4	<u>Area for Improvement</u> The force should ensure that all staff follow the College of Policing Authorised Professional Practice and its own policies and procedures to achieve consistent outcomes for detainees.	AMBER	December 2019 to align with the HMICFRS return visit	A qualitative dip sample has been developed to measure compliance with policies and procedures results to be feedback into refresher training and Custody Management Group. This dip sample has been completed for quarter 1 and is pending for quarter 2. Once the process is seen to be embedded this action will be GREEN.
	<u>Area for Improvement</u> The force should manage the health care contract effectively, with escalation to a senior level when the service falls below the standard required.	AMBER	December 2019 to align with the HMICFRS return visit	Performance data has been defined, data has commenced but remains a work in progress. Data that has been collated to date has enabled some challenge to the health care provider. Although Custody risks have formed part of the Uniformed Policing Directorate Risk Register previously to date, a specific risk register for custody is now being compiled.
6	<u>Area for Improvement</u> The force should improve its approach to performance management by collecting comprehensive information, and analysing this to show how well the service is performing and identify where improvements are needed.	AMBER	December 2019 to align with the HMICFRS return visit	A performance dashboard is starting to report to the Custody Management Group, but is still a work in progress. Daily and 7 day statistical reports are being generated for use by Custody Management. Dip sampling results from quarter 2 are pending presentation to the Custody User Group [November 2019].
7	<u>Area for Improvement</u> Custody records should be completed to a consistently high standard. The recording of information on detention logs should be sufficiently detailed and include all relevant information. Quality assurance processes should ensure that	AMBER	December 2019 to align with the	A dip sample regime has been establish and reported against quarter 1, quarter 2 results are pending. Once the process is seen to be embedded this action will be GREEN.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	the custody records meet the required standards.		HMICFRS return visit	
8	<u>Area for Improvement</u> The force should analyse data relating to diversity, to ensure that outcomes for all detainees are fair and demonstrate that custody services are meeting the public sector equality duty.	AMBER	December 2019 to align with the HMICFRS return visit	Benchmarking requests have been submitted to all forces – responses being reviewed. Diversity / demographic data is being included with monthly performance reports and presented to the Custody User Group.
	<u>Area for Improvement</u> Staff should routinely consider, and take any appropriate actions to preserve, detainees' privacy at the booking-in desk.	AMBER	December 2019 to align with the HMICFRS return visit	A mitigation has been identified [laptop to be utilised in a private side room]. This to be communicated to officers and included within Continual Professional Development safeguarding and welfare responsibilities. A 'Hatched' 'no loitering' area in Reception to be marked up to minimise opportunity to view CCTV monitors, scheduled for November 2019.
10	<u>Area for Improvement</u> The approach to managing some elements of risk should be improved. In particular: <ul style="list-style-type: none"> Detainees who are intoxicated should be placed on observation levels that include rousals. Detainees' clothing and footwear should only be removed based on an individual risk assessment. All custody staff should be involved collectively in shift handovers. 	AMBER	December 2019 to align with the HMICFRS return visit	<u>Detainees who are intoxicated</u> Continuing Professional Development sessions are being conducted to address this. Revised Qualitative dip sampling template incorporates checking of rousals. Next steps; Await results of Q2 dip sampling to determine if process embedded. <u>Detainees' clothing and footwear</u> Reminders have been issued to all Custody staff This will be further reinforced at ongoing rolling CPD sessions. L&D trainer advised to incorporate in Custody refresher training package. Dip Sample process considers not only if initial risk assessment completed but also how well completed and if it adequately covers the rational for risks identified.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
				<u>Collective in shift handovers</u> A new procedure for Custody handovers has been implemented - at this time inclusive handover between Night Duty and Early Turn staff remains unresolved due to differing and non-overlapping shift patterns and the impact of the official start of the force working day. Guidance on requirements for each shift and role was issued in September 2019 and provided alongside a Statement of Expectations for Custody Officers and Dedicated Detection Officers.
Page 95 11	<u>Area for Improvement</u> The force must consistently meet the requirements of PACE code C for the detention, treatment and questioning of suspects. In particular by: <ul style="list-style-type: none"> consistently issuing an up-to-date rights and entitlement notice to all detainees, translated into the detainee's own language when required (paragraph 3.2 of PACE code C) clearly explaining to detainees who are held 'incommunicado' the reasons for this, and ensuring that it is lifted promptly when the reasons for invoking it have expired (annex B of PACE code C) ensuring that all custody sergeants and staff provide translated documents to non-English-speaking detainees about their detention in their own language (PACE code C Annex M documents). 	AMBER	December 2019 to align with the HMICFRS return visit	<u>Rights and entitlement notice</u> Out of date notices have been withdrawn and replaced with latest versions. Custody staff have been reminded of requirement to provide Rights & Entitlements notice to all detainees reinforced at CPD and Refresher training sessions. Revised qualitative dip sampling template introduced, awaiting results of Q2 dip sampling to evidence embedding of practices. <u>Explain to detainees who are held 'incommunicado' the reasons for this.</u> Reminders have been issued to Custody staff. Revised dip sampling template includes an assessment of whether Rights & Entitlements have been delayed and with sufficient reason. Monitoring of overarching dip sampling results from Q2 2019/2020 onwards will reveal trend analysis and compliance which can then be addressed accordingly [pending]. <u>Ensure all custody staff provide translated documents</u> PACE code C Annex M documentation is now readily accessible via NICHE system. This information/process is being provided to all Custody Officers via CPD session and through Custody Initial and Refresher training. Revised dip sampling template includes a specific test for this.

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	Recommendations & Areas for Improvement	Status	Due Date	Comment
				Result of future dip samples to identify if the required change has been embedded.
12	<p><u>Area for Improvement</u> The force should strengthen its approach to conducting PACE reviews of detention by:</p> <ul style="list-style-type: none"> ensuring that it meets the requirements of section 107 of PACE, so that all acting inspectors are appropriately authorised to perform the role and that this is clearly recorded on the custody record conducting rigorous reviews for detainees held in the custody suite on behalf of others forces, so that investigations are carried out promptly and that these detainees spend no longer than necessary in custody providing accurate and detailed entries on the custody detention log, reflecting the content of the review carried out and ensuring that all detainees are told the outcome of any review conducted while they were sleeping, as required by paragraph 15.7 of PACE code C. 	AMBER	December 2019 to align with the HMICFRS return visit	<p><u>Requirements of section 107 of PACE – authorisation of acting / temporary inspectors</u> Uniform Policing Directorate have determined that processes for authorisations being given are:</p> <p>a) planned /long term authorisations given in advance given and recorded at UPD Local Resource Planning meeting</p> <p>b) for unplanned ad hoc duties. Authority for acting up to Duty / PACE Insp on an ad hoc basis within UPD is to be given via on-call UPD Supt and recorded in day-book.</p> <p>Acting and temporary duties SOP have been revised.</p> <p>The results of dip samples will confirm if practice is embedded – Quarter 2 pending.</p> <p><u>Reviews for detainees held in the custody suite on behalf of others forces</u> Statement of Expectations for Custody sergeants being reviewed. This will include a requirement to escalate those cases to Duty Insp where an officer considers are not being progressed expeditiously with particular reference to ‘other force’ Detainee Persons. Statement of Expectations for Duty Insp also being reviewed, updated and reissued to include this requirement.</p> <p><u>Accurate and detailed entries on the custody detention log</u> Included with the dip sample process</p>
13	<p><u>Area for Improvement</u> Staff should conduct and record standardised daily cell checks</p>	AMBER	December 2019 to align with the	The format of the template is being reviewed to ensure it addresses Detained Persons safety and security with qualitative actions.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
			HMICFRS return visit	
14	<u>Area for Improvement</u> The force should ensure that all custody staff take part in an annual fire drill	AMBER	December 2019 to align with the HMICFRS return visit	Fire Evacuation Exercise Record Document will now record specific names of those involved in any live or planned exercise rather than just Group on duty. Custody Inspector has consulted with CoL Emergency Planning Officer, to devise and facilitate a table-top which took place in September 2019. A live exercise is being planned for 2020. This will be in addition to any Facilities Management planned exercises and other unplanned incidents that take place in year.
15	<u>Area for Improvement</u> The governance of the use of force in custody should be improved and provide assurance that when force is used it is safe and proportionate to the risk posed. In particular: <ul style="list-style-type: none"> The force should collate accurate data concerning the use of force and ensure that all incidents are adequately recorded on custody records. All staff involved in incidents in which force is used should complete individual use of force forms. Incidents involving the use of force should be quality assured, including cross-referencing with closed-circuit television. 	AMBER	December 2019 to align with the HMICFRS return visit	Work has been conducted to develop a reconciliation process between the recording of Use of Force (UoF) from the PRONTO system [mobile devices] where UoF forms are recorded and held and the application of UoF as detailed in Custody records. Reports have commenced and are being provided on a 2 weekly basis. The reconciliation process has resulted in a compliance rate of 90%. Use of Force is now part of the Dip Sampling process within custody management and includes cross reference with CCTV records. Use of Force is reported to the Custody User Group and to the Police Authority Board.
16	<u>Area for Improvement</u> Detainee care should be improved. In particular, detainees should: be able to access fresh air and exercise in a suitable facility; be routinely provided with toilet paper; and be provided with replacement footwear when theirs is removed.	RED	December 2019 to align with the HMICFRS return visit	Investigations into requirements of providing a secure exercise area in the courtyard of Bishopsgate have been costed. The available options would still result in compromises for the dignity and respect of Detained Persons in that the area is overlooked by surrounding buildings. The accommodation is not suitable. Additionally, funding for this has not been built into the budget.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
				<p>There are no other mitigations available in the current accommodation but this will be a consideration in the specification for the build of the new Police/ Courts building.</p> <p>Reminders have been issued and will be raised again at the next series of rolling CPD sessions to embed.</p> <p>Dip sampling of initial Risk Assessment records to ensure actions taken in respect of risks identified are adequately recorded.</p> <p>All Detained Persons to be encouraged to wear footwear provided when they are moving around suite outside of cell.</p>
Page 98	<p><u>Area for Improvement</u></p> <p>The force should ensure that it consistently identifies when an appropriate adult is needed for a vulnerable adult, and that one is subsequently secured without undue delay.</p>	AMBER	December 2019 to align with the HMICFRS return visit	<p>Contract for Appropriate Adults has been reviewed (in conjunction with CoL). A requirement to meet needs of Vulnerable Adults as well as children has been included to formalise requirements and service expectations. Specific KPIs have been incorporated into new contract. Specifications were agreed and were due commence in July 19, however, due to slippage they have not yet been implemented. The force is developing reports to monitor performance</p> <p>A revised dip sample template will seek to confirm the necessary improvements are embedded.</p>
18	<p><u>Area for Improvement</u></p> <p>Joint performance monitoring meetings should routinely analyse evidence about all aspects of staffing (vacancies, contingencies, training and supervision) and focus performance data to obtain assurance about detainee outcomes rather than simply considering health care practitioner activity.</p>	AMBER	December 2019 to align with the HMICFRS return visit	<p>Data extract work in being undertaken to support performance monitoring.</p> <p>Reminders have been sent to the provider requesting production of data, which remains outstanding.</p> <p>The provider now provides a rota detailing when Health Care Practitioners are available at Bishopsgate and when on call.</p> <p>Monthly provider/force meetings for remainder of year have been scheduled.</p>

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Recommendations & Areas for Improvement		Status	Due Date	Comment
19	<u>Area for Improvement</u> The provision of the planned embedded seven-day pilot scheme should be introduced as soon as practically possible.	AMBER	December 2019 to align with the HMICFRS return visit	This pilot is being led by Liaison and Diversion Team and delivery is under their control and direction. They are currently at the recruitment phase. It is anticipated that all staff will be in place by end of year. There will be a 7 day service but this will not be fully embedded within City due to activity levels. Staff will be available but based at Bethnal Green or Stoke Newington but will be available for initial telephone triage if necessary. The force has supplied an office for their use. Liaison meetings are held where updates are provided as regards delivery of their project and an anticipated schedule for implementation will be sought.
20	<u>Area for Improvement</u> The recording of release arrangements, to ensure that detainees are released safely, should be more detailed.	AMBER	December 2019 to align with the HMICFRS return visit	This is included in CPD sessions for Custody Officers. Review of travel assistance offered is to be conducted - petty cash vs travel warrant vs informal arrangements with TfL to support unfunded travel vs use of police vehicles. Guidance to be provided as to suitability of nature of arrangements in line with risks identified for individual (providing cash to drug addict and not using for agreed purpose) The new dip sampling template examines this area.
21	<u>Area for Improvement</u> Unnecessary documentation should not be added to person escort records, and any medical examination notes that need to accompany the detainee should be placed in a sealed envelope marked 'confidential'.	NEW GREEN	December 2019 to align with the HMICFRS return visit	A reminder has been sent to all officers. Dip sampling process monitors the following for assurance.
22	<u>Area for Improvement</u> Detainees should be moved to escort vehicles in a way which protects their dignity and privacy.	AMBER	December 2019 to align with the HMICFRS return visit	The Uniform Policing Directorate Head has directed that drivers of vans / cars delivering to or conveying prisoners from Bishopsgate must reverse to the station doors. This will reduce the risk of indignity as highlighted by the inspection, but also maximise officer safety and minimise risk of prisoner escape and any physical risk to prisoners.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
				The Custody Manager is drafting a Guidance Document for publication to support.

Policing and Mental Health - Picking Up the Pieces

A national joint report by HMICFRS

Published November 2018

This report makes 3 recommendations for the police – 1 complete, 2 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<p><u>Recommendation</u></p> <p>By December 2019, forces should develop a better understanding of their mental health data, and the nature and scale of their demand. All forces should carry out a 24-hour snapshot exercise, using the new national definition of mental ill-health in Recommendation 1. This would help them see where their mental health demand is concentrated and identify any gaps in their data. The NPCC mental health lead should set out how the data was collected during the Welsh forces' snapshot exercise.</p> <p>This exercise will help forces understand the strain on the service by assessing the combination of demand and workload. This will then help forces when establishing and reporting mental health demand in their force management statements (FMSs).</p>	AMBER	December 2019	On the 7 th August 2019 the NPCC lead for Mental Health and Policing wrote to Chief Constables confirming that a national mental health 24 hour demand exercise was scheduled for 8 th October 2019. The force confirmed its willingness to participate, however the exercise has been postponed – the force will be seeking direction from the NPCC lead.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
3	<p><u>Recommendation</u> By August 2019, all forces should review their existing partnership mental health triage services to assess their effectiveness, and the environment they are operating in. This will help them make decisions about sustainable future services with partners to make sure mental health care needs are being met. If forces find any deficiencies in their triage services, they should take steps to address them as soon as reasonably practicable. The College of Policing has agreed to devise some practice guidelines to help forces benchmark their triage activity. We will inspect on progress in this area as part of our integrated PEEL assessments inspection framework.</p>	WHITE	August 2019	Practice guidelines from the College of Policing to help forces benchmark their triage activity are pending. During the hot debrief for integrated PEEL inspection November 2018, feedback was positive in this area.
4	<p><u>Recommendation</u> By August 2019, all forces should review their mental health training programmes, using the College of Policing learning standards, to establish whether they are giving their officers the right tools to understand and respond to people with mental health problems. If forces find any deficiencies in their training programmes, they should take steps to address them as soon as reasonably practicable. Where forces invite outside organisations to train staff, they must make sure its content and quality are checked against College of Policing APP.</p>	NEW GREEN	August 2019	<p>August 2019 saw the completed delivery of Vulnerability training to the force, this was the College of Policing package which included elements on mental health. Following this, a review of the package was undertaken The main failing of the College of Policing package was that it failed to adequately cover local policies and procedures. As such, the new piece helps equip a first responder with what they need to deal with mental health and other issues under the heading of 'vulnerability'. The training also covers the new definition of a 'mental health related incident'. The role of out of this started at the end of August 2019, initially to frontline with plans for Priority 2 thereafter.</p>

Understanding the difference: the initial police response to hate crime

A national report by HMICFRS

Published July 2018

This report makes 15 recommendations. 8 are for the force and 5 of these are complete, 2 are in progress and 1 is held at WHITE pending the outcome of a review by the NPCC lead and College of Policing.

Recommendations & Areas for Improvement		Status	Due Date	Comment
6	<p><u>Cause of concern</u> We found that forces don't consistently use the Home Office cyber-enabled flag. This means forces and the government may not have good enough information to understand how much different groups are targeted online, which means they can't make sure effective decisions are made about how to respond.</p> <p><u>Recommendation</u> We recommend that, within three months, chief constables make sure that the Home Office cyber-enabled flag is consistently applied, and that forces have adequate systems in place to make sure that this is done.</p>	NEW RED	<p>October 2018</p> <p>Now January 2020</p>	<p>The Head of Public Protection produced a new role and responsibilities [Crime Screening, Allocation and Finalisation Force Policy & Standard Operating Procedure] ahead of the implementation of the new Force Resolution Centre to ensure appropriate processes are embedded, which included flagging. The force resolution centre went live 1st April 2019 and the deadline for this action is extended to January 2020 to ensure that compliance with the guidance is bedded in. The Performance Information Unit has confirmed that this flag is used to extract data from forces systems [Niche] and used within returns to the Home Office.</p>
8	<p><u>Recommendation</u> Our inspection shows that some hate crime victims get a better service than others. This is because forces apply the national minimum standard of response to victims of hate crime inconsistently.</p> <ul style="list-style-type: none"> • We recommend that, within six months, the NPCC lead for hate crime works with the College of Policing to review the operational guidance about the minimum standard of response to establish if it is still appropriate and relevant for forces • We recommend that, following the review, any agreed minimum standard of response for forces should be 	WHITE	January 2019	<p>This action is for the NPCC lead for hate crime and College of Policing.</p> <p>The force complies with current guidance issued by the College of police Hate crime operation guidance 2014.</p> <p>The College of Policing are reviewing their guidance and this is out for consultation – closed 5/11/2019.</p> <p>There is currently no date for formal publication.</p>

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	monitored by force governance processes, including external scrutiny.			

Out-of-court disposal work in youth offending teams

A national joint report by HMI CFS and HMI Probation

Published March 2018

This report makes 11 recommendations, 5 are for the force – all complete.

Recommendations & Areas for Improvement		Status	Due Date	Comment
Page 103 5 6	Recommendation Youth offending teams and chief constables should: Make sure that the requirements of youth conditional cautions are meaningful to children, and describe the desired outcomes and how these will be achieved.	NEW GREEN	No deadline specified within the report	The force has conducted an audit which has established a baseline of the number of youth conditional cautions and shortcoming arising from their issue. Numbers are low: 8 youth cautions and 3 youth conditional cautions in the year 2017/2018.
	Recommendation Youth offending teams and chief constables should: Make sure that all victims have a fully informed and effective opportunity to have their views heard, and to receive an appropriate restorative intervention.	NEW GREEN	March 2019 deadline set	A new SOP has been published which addresses recommendations. Delivery of the caution will be by the Custody Manager to ensure consistency of delivery.
	Recommendation Youth offending teams and chief constables should: Make sure that children understand the implications of receiving an out-of-court disposal before they are asked to accept it.	NEW GREEN	Now July 2019	

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Recommendations & Areas for Improvement		Status	Due Date	Comment
10	Recommendation Chief constables should make sure that referrals to YOTs are sufficiently timely to meet the needs of victims for speedy justice and achieve the objectives of out-of-court disposals; and make the YOT aware of all community resolutions given by the police.	NEW GREEN		Compliance with the SOP will be undertaken within Business as Usual.
11	Chief constables should make sure that they have clear and consistently applied policies for the gathering of fingerprints and other biometric information in youth caution and conditional caution cases.	NEW GREEN	No deadline specified within the report August 2019 deadline set	The following SOPs have been reviewed, amended and published: Custody Juvenile Detainees SOP Custody – Fingerprints and non-intimate samples within a Custody Suite SOP

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PEEL: Police Effectiveness 2017 – National

A national report by HMICFRS

Published March 2018

This report was published 22nd March 2017.

There are 4 recommendations which applies to the force; 3 are complete, 1 is held at WHITE pending input from the College of Policing

Recommendations & Areas for Improvement		Status	Due Date	Comment
3	Recommendation The College of Policing, working with the NPCC leads, should develop an approach to peer review. This approach should support forces to work with each other to improve how they identify, respond to and keep safe vulnerable victims.	WHITE	September 2018 And January 2019	Details of the peer review approach have not been released by the College of Policing at this time. Local peer review and opportunities to share best practice are being developed through the regional Vulnerability Steering Group chaired at commander level by the MPS. BTP are in attendance. The force submitted its Vulnerability Action Plan to the NPCC lead (Norfolk) Although broadly positive, feedback was received that we needed to

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	The infrastructure to support peer reviews should be in place by September 2018 with the first reviews taking place by January 2019.			improve our strategic training with partners. Supt UPD Ops is negotiating attendance for CoLP and relevant COL leads to attend the highly recommended MPS-designed Hydra exercise called the Strategic Partner Agency Safeguarding Exercise (SPASE) designed for senior leaders in policing, health, education, children and adult services.

Living in fear - the police and CPS response to harassment and stalking

A joint national report by HMCPSi and HMIC, Published July 2017

There are 22 recommendations; 4 of which apply to force and are completed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
Page 105 10	Chief constables should work with criminal justice partners to identify what programmes are available to manage offenders convicted of harassment and stalking offences in their respective force areas. In the absence of such programmes, they should review whether interventions could and should be established.	NEW GREEN	No deadline set by HMICFRS A deadline of April 2019 has been set New deadline set July 2019	The Head of Public Protection has sought confirmation from criminal justice partners as to what programmes they access for convicted offenders. The force has engaged with the MPS Stalking Threat Assessment Centre which is leading a multi-agency team to develop perpetrator programmes. Partners include probation and mental health. The Acting Head of PPU has engaged with this team, resulting in the force having access to these programmes.

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Committee(s): Police Performance and Resource Management Committee	Date(s): 15 th November 2019
Subject: Policing Plan 2019-20- Performance against measures for end Q2	Public
Report of: Commissioner of Police Pol 83-19	For Information
Report author: Hayley Williams obo Dai Evans, T/Commander Operations and Security	

Summary

This report summarises performance against the measures in the Policing Plan 2019-20 for the period 1st April 2019 to 30th September 2019.

MEASURE	CURRENT ASSESSMENT Q1&2	4 th QUARTER ASSESSMENT 2018/19	3 rd QUARTER 2018/19 ASSESSMENT	TREND
Measure 1: The number of crimes committed in the City	REQUIRES ACTION	REQUIRES ACTION	REQUIRES ACTION	➡
Measure 2: The capability and impact the Force is having against countering Terrorist Activity.	SATISFACTORY	SATISFACTORY	SATISFACTORY	➡
Measure 3: The capability and impact the Force is having against countering Cyber Attacks.	SATISFACTORY	SATISFACTORY	SATISFACTORY	➡
Measure 4: The capability and impact the Force is having against countering Fraud.	SATISFACTORY	SATISFACTORY	SATISFACTORY	➡
Measure 5: The capability and impact the Force is having in safeguarding and protecting Vulnerable People.	SATISFACTORY	CLOSE MONITORING	CLOSE MONITORING	↑
Measure 6: The capability and impact the Force is having against countering Violent Crime.	CLOSE MONITORING	REQUIRES ACTION	REQUIRES ACTION	➡
Measure 7: The capability and impact the Force is having in policing City Roads.	SATISFACTORY	SATISFACTORY	SATISFACTORY	➡
Measure 8: The capability and impact the Force is having providing Protective	SATISFACTORY	SATISFACTORY	SATISFACTORY	➡

Security to the City and responding to Public Order.				
Measure 9: The capability and impact the Force is having against countering Acquisitive Crime.	REQUIRES ACTION	REQUIRES ACTION	REQUIRES ACTION	➔
Measure 10: The level of satisfaction of victims of crime with the service provided by the city of London police.	DATA IS BEING ANALYSED BY PIU	DATA NOT AVAILABLE	DATA NOT AVAILABLE	N/A
Measure 11: The percentage of people surveyed who believe the police in the City of London are doing a good or excellent job.	IN PROGRESS	SATISFACTORY	SATISFACTORY	➔

Recommendation

Members are asked to: Note the report.

Main Report

Background

1. This report presents Force performance against the measures published in your Police Authority Board's three year Policing Plan 2017-20 for the year 2019-20, reporting for the performance for quarter 2 to the end of September 2019. Supporting data is contained within Appendix 'A'.
2. For the Force Performance Management Group (PMG), measures are graded around whether performance is 'Satisfactory', requires 'Close Monitoring' or 'Requires Action'. As requested at the Performance and Resource Management Committee meeting in May 2017 the report to your Committee continues to reflect the grading reported at the Force PMG and the summary table shows the trend from the previous quarter over a rolling 4 quarter period where available.

Current Position

Overview of Crime- (Measure 1- The number of crimes committed in the City)

3. A comparison for Q2 2019-20 with the same period in 2018-19 shows that:
 - The level of overall crime reported in the City has risen by 35% (1179 crimes) for the year to date based on the level of crime recorded in 2018/19. There have been 4576 crimes recorded in 2019/20 compared to 3397 for the same period in 2018/19.
 - The corresponding sanction detection percentage rate for YTD to end of Q2 for all crimes is 17% and for Positive Outcome rate (including Community Resolution) is 18%.

4. National comparison – Unfortunately, the most recent published data for national crime levels provide reports to the end of July 2019 rather than end Q2. Nationally crime had risen by 1.8% to end July 2019 across England and Wales; with 26 out of 43 forces reporting an increase. Nationally levels of crime have continued to rise since February 2018; with a more recent trend forming in early 2019. This national pattern is consistent with the reported trends in the City. Nationally the detection rate for all crime for the period to the end of July 2019 was 10%; and the positive outcome rate was 12%. The City for the same period was performing above this level for both measures - with a detection rate of 15%; and a positive outcome rate of 16% for the same period.
5. The most significant areas of *reduction* for Q2 in comparison with the same period in 2018-19 are for:
 - Violence with injury (-31% decrease, -32 crimes)
 - Robbery of business Property (-33% decrease, -11 crimes)
 - Stalking and harassment (-32% decrease, -26 crimes)
 - Theft of motor vehicle (-38% decrease, -15 crimes)
 - Bicycle theft (-3% decrease, -8 crimes)
6. Successes include a slight decrease in bicycle theft, attributed to a prolific known bicycle theft offender having been issued with a Community Behavioural Order (CBO).
7. In terms of other reductions, the Crime Squad has been enhanced and specific roles and responsibilities have been allocated to Senior Officers in Crime around offender management and Uniformed Policing around the Patrol Strategy, with clearer lines of 'ownership'.
8. Reductions in violence with Injury may be attributed to Operation Sparta tactics which include a high visibility violent crime Task Force flooding hot spot areas on the street and on the main arterial routes. It is a partnership approach with the Metropolitan Police Service (MPS).
9. With reference to Robbery of business property, again this is probably due to the overall focus on crime reduction targeting those wanted on warrant and prevention and target hardening at repeat business/ retail locations.

What are the issues?

10. The Policing Plan measures shown as either 'Requires Action' or Close Monitoring' for Q2 period ending 30th September 2019 are:
 - **Measure 1**-The number of crimes committed in the City is assessed as 'Requires Action';
 - **Measure 6**- The capability and impact the Force is having against countering Violent Crime, is assessed as 'Close Monitoring'
 - **Measure 9**- The capability and impact the Force is having against countering Acquisitive Crime is assessed as 'Requires Action'.

11. The most significant areas of *increase* for Q2 in comparison with the same period in 2018-19 are for:
 - Burglary- residential (380% increase, 11 crimes),
 - All other theft (98% increase, 719 crimes)
 - Criminal Damage (43% increase, 43 crimes),
 - Drug Trafficking (102% increase, 51 crimes)
 - Robbery of personal property (73% increase, 29 crimes)
 - Theft from the person (41% increase, 122 crimes)
 - Violence without injury (42% increase, 109 crimes).
12. In comparison to the same period in 2018-19:
 - Victim based acquisitive crime overall has seen an increase of 43% (906 crimes);
 - Victim based violent crime has seen only a slight increase of 2% (10 crimes).

What are we doing about it?

13. Positive police action over the past 12 months continues to develop and refine tactical deployments. The Crime Reduction Strategy and associated 4P plans are now live and a report on progress is reported to the Force PMG.
14. The Daily Crime Meeting is attended by the DCI and DI for Crime, and is a forum to review crime trends feeding into the Daily Management Meeting (DMM) for quick time organic tasking which has no doubt had a positive impact on reducing crime in certain areas.
15. The Performance Information Team meets with Crime, Public Protection Unit and Community Policing each month to understand operational context to emerging and existing crime trends. This is leading to greater understanding of the reasons behind the performance trends; and resulting in earlier identification of emerging trends in turn supporting proactive efforts and tasking aimed at reducing crime.
16. A series of internal Directorate, Departmental, Unit, Team and individual performance metrics have been developed; and are being trialled. These are informing a series of 1:2:1 meetings led by the T/Commander Operations meeting with response group and unit Inspectors to drive through performance and productivity improvements.
17. Targeted Operations are in place such as Operations Sparta (Violent Crime types) and Op Tundra (Acquisitive Crime types) and Senior Officers have been given specific responsibility and focus for offender management. Although not related specifically to Q1 and 2, it is of note that the total number of outstanding offenders for CoLP for Warrants/Wanted PNC/Suspects Outstanding and Bail has reduced from 1262 in January 2019 to 671 at end of October 2019 through targeted offender management.

18. Further specific details of analysis and the Force's operational response is detailed below.

Detailed overview from areas of increase

Burglary Residential-

- Burglary Residential is showing a large percentage change but the volumes are relatively low and this crime category is more susceptible to large percentage increases and decreases.
- Levels have been above the five year average for the last six months; and are higher than usually experienced at this time of year.
- The FIB burglary profile looking at offences from January to May 2019 notes that the most common days for residential burglaries are Friday-Sunday; with offences usually taking place overnight and jewellery and cash being stolen. Those offences that have occurred since May do not follow a clear pattern.
- There have been a number of attempted break-ins in flats where locks have been damaged; and also theft from hotels/short term lets. In these occurrences items left in the rooms have been taken; but there are no repeat locations. The most commonly stolen items from hotels include cash and bank cards. Where items have been taken from victims' homes the type of property taken most often are computer equipment (laptops and tablets); followed by cash and jewellery.
- This is one crime type that is likely to continue to increase given the number of building projects underway in the City; increasing the number of both residential and hotel properties and hence creating more opportunities.
- CoLP arrested and charged an offender with 3 burglary offences at the beginning of September.

Theft other and theft from the person

- The All Other Theft category includes a number of different types of theft including; bag thefts from licenced premises/cafes, gym thefts, bag snatches and distraction thefts.
- For the financial year to date, All Other Theft makes up a third of all recorded crime. A recent review of the data discovered that 875 of these offences were related to items such as bags, laptops, wallets/purses and phones; stolen from individuals in cafés and licensed premises. This property group accounts for 19% of all crime for the financial year to date.
- Although there is marked increase in comparison to this period in 2018-19, levels peaked in April / May 2019, the Force's Tasking and Coordination Group continues to oversee targeted crime operations and levels have been decreasing since June 2019.
- Operation Tundra is focusing on the theft of bags from licenced premises which is thought to be linked to an OCG based in the MPS, who it is believed are committing similar bag thefts across the MPS, City force areas and BTP (London transport network). This Operation Problem Profile is maintained by the Force Intelligence Bureau listing a number of related offenders; some of whom have recently been arrested.

- Thursday and Friday evenings are the key times for offending with specifically laptop bags and backpacks being key targets.
- Proactive development work from CID, Communities, Licensing and Crime Squad lead to the arrest of an Operation Tundra suspect who was subsequently charged with 3 offences. A Section 18 search of the suspect's residence resulted in a significant cash seizure. A further individual was arrested at the end of the month and charged and remanded for five bag theft offences.
- Community Policing officers have been handing out bag hooks to members of the public as a preventative measure and an awareness campaign has been rolled out across the City with posts appearing on social media as well as bus stop advertising to coincide with Operation Tundra days of action.

Criminal Damage

- There was a particularly sharp increase in criminal damage in September 2019. The peak time for this offence is between 22:00-23:00 on a Friday evening.
- The majority in September have been related to graffiti (11) or road rage incidents resulting in vehicle damage (6). There is no reported link between the graffiti incidents although reports relating to a group of unidentified males are increasing.
- There was only one incident related to Extinction Rebellion related slogan being sprayed on to the side of the Old Bailey, for which the offender was arrested.
- There are two repeat locations that relate to the same incidents with multiple offenders; solely the UBS building on Broadgate reported more than one incident.
- In one occurrence enquiries regarding the specific 'Tag' with the BTP graffiti team identified a suspect for further action.

Drug Trafficking

- The increase in trafficking is generally concerned with cocaine.
- There was a sharp increase in trafficking offences between February and July 2019.
- Further detailed analysis work is required to determine if this increase is linked to an actual rise in trafficking activity or is a result of increased officer response to the Force's renewed emphasis on numbers of arrests and stop searches.

Robbery of Personal Property

- Although robbery of personal property shows an increase of 73% in this period in comparison to the same period in 2018-19 and continues to show a rolling 12 month increase of 43%; it has decreased by 17% in the month of September 2019 and has greatly reduced from the spikes seen in September 2018 and June 2019.
- This progress is attributed to proactive deployments by Crime Teams within intelligence led hotspot areas, with activities focused on both target hardening repeat locations and deterring potential offences.
- There was a significant arrest at beginning of August which is being progressed.

Violence without Injury

- The crime type of Common Assault is strongly impacting the overall 'Violence without Injury' category, 83% - 308 of the 371 crimes; with 'Assault or assault by beating of a constable' showing 4%- 17 of the 371 crimes.
 - However, Common Assault has decreased slightly in the month of September.
 - The assault problem profile found, not unexpectedly, that the Bishopsgate area is a hotspot for common assault, with Bishopsgate and Liverpool Street being repeat street locations. Repeat venues includes a retail supermarket in Bishopsgate, and hotel in Liverpool Street. These types of offences are also commonly taking place within Night Time Economy (NTE) hours (1800-0600) and can involve staff members being assaulted by drunk or unruly customers.
 - There were a series of offences this month involving victims having water thrown at them from a high bridge which they initially thought might have been acid, the offender has been identified and due to their age (juvenile) Community Policing are working with them to address the offending behaviour.
 - As aforementioned in paragraph 8. The Force's operational response to violence is through Op Sparta through which a high visibility violent crime Task Force is being deployed on the street, at hotspot locations and on main thoroughfares. This is in partnership with the MPS.
19. **Measure 10-** The level of satisfaction of victims of crime with the service provided by the City of London police.
- The survey has been undertaken but awaits full analysis by the Performance Information Unit which has limited resources currently. A detailed separate report will be submitted to your 7th February 2020 Committee on this subject.
20. **Measure 11-** The percentage of people surveyed who believe the police in the City of London are doing a good or excellent job.
- The survey has being rolled out w/c 4th November and can be accessed on this link www.opinionresearch.co.uk/COLP. The street survey will run for up to two weeks, but the on line survey link will be open until the 1st December.
 - Initial reporting of percentage results for response is anticipated for mid-December and a fuller results report expected by the end of January 2020. Depending on the date the Force receives the full report an initial update will be submitted to the 7th February 2020 Performance and Resource Management Committee.

Anti-Social Behaviour

21. Although ASB is not identified in the strategic assessment as a priority for City of London, it is recognised that this is an important issue for the residents and workers and the Force, in discussion with Members agreed that this would be reported on as part of the Policing Plan measures.

22. Due to resourcing constraints within the Force Performance Information Unit (PIU) the ASB data analysis within Appendix A only covers the period May to July 2019 rather than Q1 & Q2. Recruitment is currently taking place within the PIU to increase capacity and capability.
23. At your Police Authority Board in April 2019, the Lead Member for Community Engagement and ASB requested that the Force separate out the statistics for begging and rough sleeping. This is not possible for the following reason: The Categories of ASB are defined by the Home Office National Standard of Incident Recording (NSIR) and are set as part of the Home Office Counting Rules (HOCR). Rough Sleeping is not a classification category.
24. In practice rough sleeping related incidents as reported by complainants tend to fall in to a number of the available categories (listed below) including – trespass, inconsiderate behaviour, begging/vagrancy, noise nuisance. Additionally, the Member suggested that the reports should not use the term ‘vagrancy’, however it is a descriptor as defined by the Home Office and therefore the Force, whilst understanding the sensitivities, will continue to need to use the descriptor in the data collection set.

Source: NSIR HOCR

NSIR ASB - Begging / Vagrancy
NSIR ASB - Drunken Behaviour
NSIR ASB - Inconsiderate Behaviour
NSIR ASB - Inappropriate use of Fireworks
NSIR ASB - Noise Nuisance
NSIR ASB - Shouting and Swearing
NSIR ASB - Throwing Things
NSIR ASB - Trespass
NSIR ASB - Animal Problems
NSIR ASB - Littering
NSIR ASB - Prostitution Related Activity
NSIR ASB - Vehicle Nuisance
NSIR ASB - Malicious / Nuisance Communications
NSIR ASB - Street Drinking
NSIR ASB - Nuisance Neighbours
NSIR ASB - Abandoned Vehicle

Data and response

25. For the period May- July 2019, the number of ASB incidents recorded each month has been lower than the peak seen in March and April, averaging 99 incidents a month compared to 115 for the previous three month period.
26. **Inconsiderate Behaviour** and **Begging** are the categories with the highest number of ASB incidents recorded in the period. There were 97 incidents for inconsiderate behaviour and 79 for Begging. The third most recorded are ASB incidents for **Drunken Behaviour**; where there were 45 such reports.

27. The Force continues to combat ASB and **Operation Luscombe** is the main tactical operation for this. The Chief Inspector (CI) for Communities and the PC that set up Op Luscombe have met with Assistant Chief Constable Andy Prophet of Essex Police in his role as the NPCC lead for ASB nationally. He was very interested in the scheme and invited the CI and Constable to attend the national ASB conference to launch the scheme nationally. The officers attended this conference and presented on Op Luscombe which was incredibly well received. There were representatives from the Department of Housing, Communities and Local Government at the meeting who were also very interested in the operation and have asked that the officers attend the Home Office to present the operation to Government with a view to Operation Luscombe being made a national standard for all forces to adopt in their approach to begging and other instances of anti-social behaviour. A fuller review of the Operation is due to be submitted to the Police Authority Board on 28th November for Members information.

Corporate & Strategic Implications

28. The Force Policing Plan Measures are linked to the Corporate Plan ambition around making the City of London the safest city area in the world. Measuring how we combat and tackle crime within the City allows the Force to track progress against this ambition.

Conclusion

29. The Force continues to work on the areas where the Policing Plan Measures indicate that an improved response is required. T/Cdr Evans is developing a robust response to Force Performance and Crime Reduction which will continue throughout the performance year. However, it should be noted that there is a national crime increase trend. The measures reported within this report are for the 2019/20 Policing Plan.

Appendices

- Appendix A –End Q2 Data for Measures Against Policing Plan

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Measure 1	City Crime Overview	Assessment	REQUIRES ACTION
AIM/RATIONALE	To ensure the overall picture of crime within the City is monitored and emerging trends are acted upon within year.		
Reason for Assessment	There continues to be a month on month rise in crime committed within the City. Currently the Force has experienced a 35% rise in crime in quarters one and two compared to the same period in 2018/19.		

Crime Volumes by Category

Crime Category	Month on Month					Financial Year To Date					Rolling 12 Months				
	Current Month	Previous Month	Frequency Change	% Change	Direction	FYTD 18/19	FYTD 19/20	Frequency Change	% Change	Direction	Previous Rolling 12 months	Current Rolling 12 months	Frequency Change	% Change	Direction
All Other Theft Offences	188	181	7	4%	↑	735	1454	719	98%	↑	1549	2574	1025	66%	↑
Arson	2	0	2	0%	○	0	2	2	-	○	2	2	0	0%	○
Bicycle Theft	31	56	-25	-45%	↓	276	268	-8	-3%	↓	421	466	45	11%	↑
Burglary - Business/Community	22	26	-4	-15%	↓	162	154	-8	-5%	↓	315	294	-21	-7%	↓
Burglary - Residential	4	4	0	0%	○	5	24	19	380%	↑	15	32	17	113%	↑
Burglary All	26	30	-4	-13%	↓	167	178	11	7%	↑	330	326	-4	-1%	↓
Criminal Damage	36	20	16	80%	↑	99	142	43	43%	↑	232	263	31	13%	↑
Death Or Serious Injury Unlawful Driving	0	0	0	0%	○	0	0	0	-	○	0	0	0	-	○
Drug Possession	63	53	10	19%	↑	181	252	71	39%	↑	305	460	155	51%	↑
Drug Trafficking	10	18	-8	-44%	↓	50	101	51	102%	↑	81	154	73	90%	↑
Homicide	0	0	0	0%	○	1	0	-1	-100%	↓	1	0	-1	-100%	↓
Miscellaneous Crimes Against Society	30	35	-5	-14%	↓	81	133	52	64%	↑	143	218	75	52%	↑
Other Sexual Offences	12	15	-3	-20%	↓	43	45	2	5%	○	81	76	-5	-6%	↓
Possession Of Weapons Offences	8	5	3	60%	↑	41	39	-2	-5%	↓	72	66	-6	-8%	↓
Public Disorder	45	45	0	0%	○	222	268	46	21%	↑	379	478	99	26%	↑
Rape	1	3	-2	-67%	↓	13	11	-2	-15%	↓	26	26	0	0%	○
Rape & Other Sexual Offences	13	18	-5	-28%	↓	56	56	0	0%	○	107	102	-5	-5%	↓
Robbery Of Business Property	1	2	-1	-50%	↓	33	22	-11	-33%	↓	40	34	-6	-15%	↓
Robbery Of Personal Property	10	12	-2	-17%	↓	40	69	29	73%	↑	86	123	37	43%	↑
Shoplifting	63	89	-26	-29%	↓	414	507	93	22%	↑	802	1015	213	27%	↑
Stalking And Harassment	11	9	2	22%	↑	82	56	-26	-32%	↓	164	121	-43	-26%	↓
Theft From Motor Vehicle	12	7	5	71%	↑	85	54	-31	-36%	↓	170	135	-35	-21%	↓
Theft From The Person	73	92	-19	-21%	↓	295	417	122	41%	↑	656	759	103	16%	↑
Theft Of Motor Vehicle	6	3	3	100%	↑	39	24	-15	-38%	↓	74	40	-34	-46%	↓
Vehicle Interference	1	0	1	0%	○	7	4	-3	-43%	↓	10	11	1	10%	↑
Violence With Injury	26	28	-2	-7%	↓	231	159	-72	-31%	↓	448	390	-58	-13%	↓
Violence Without Injury	77	67	10	15%	↑	262	371	109	42%	↑	462	695	233	50%	↑
All Crime	732	770	-38	-5%	↓	3397	4576	1179	35%	↑	6534	8432	1898	29%	↑
Victim-Based Violence	127	122	5	4%	↑	632	642	10	2%	↑	1182	1308	126	11%	↑
Victim-Based Acquisitive	411	472	-61	-13%	↓	2091	2997	906	43%	↑	4138	5483	1345	33%	↑

*Direction symbols: ↑ increase ↓ decrease ○ no change

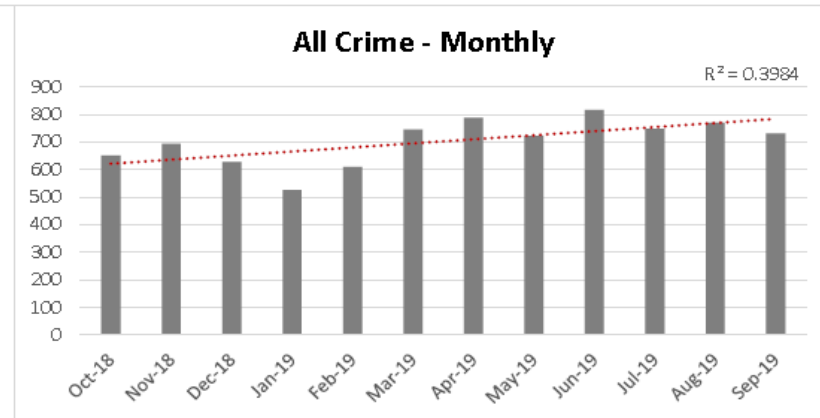
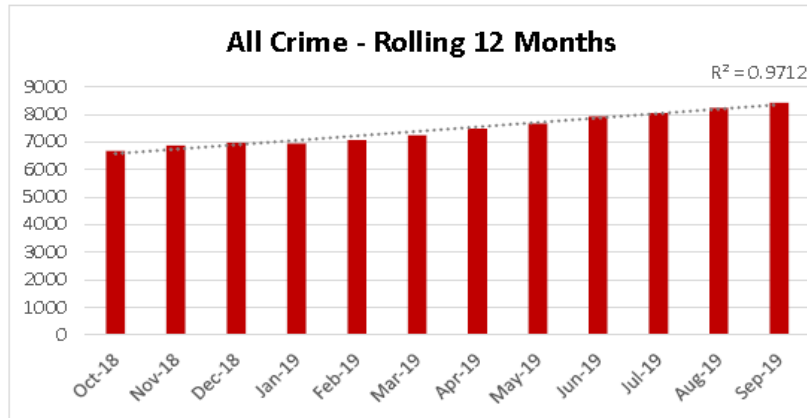
*Direction colours: Green – more than 10% decrease Red – more than 10% increase Orange – less than 10% increase or decrease

ANALYSIS

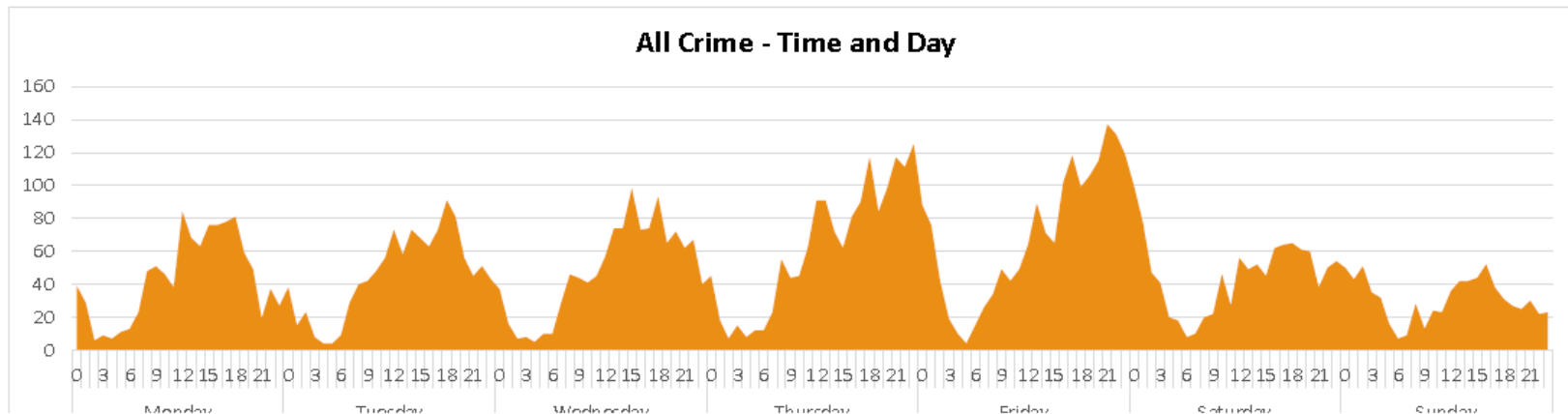
Detections Financial Year to Date

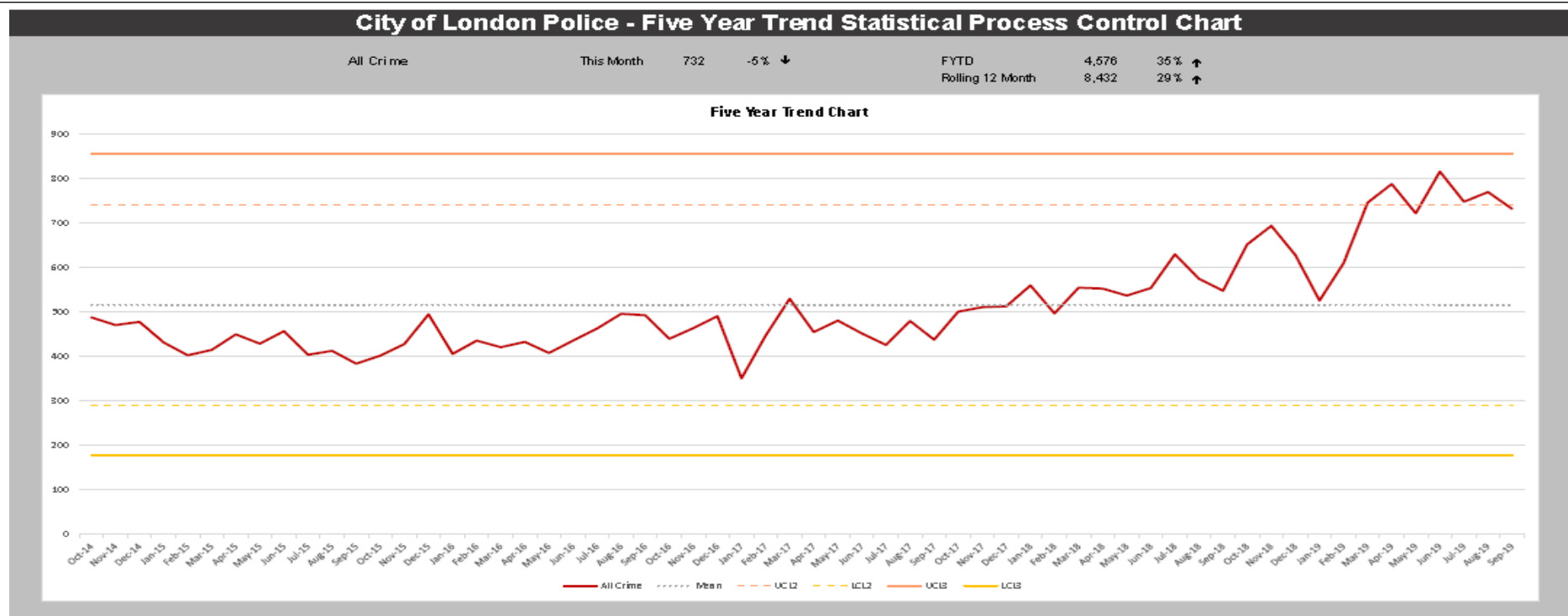
	Sanctioned Detections FYTD		Positive Outcomes FYTD		Sanctioned Detections 18/19		Positive Outcomes 18/19	
Crime Category	Count	Rate	Count	Rate	Count	Rate	Count	Rate
All Other Theft Offences	54	4%	57	4%	48	3%	56	3%
Arson	0	0%	0	0%	1	-	1	-
Bicycle Theft	6	2%	6	2%	17	4%	18	4%
Burglary - Business/Community	15	10%	15	10%	44	15%	44	15%
Burglary - Residential	1	4%	1	4%	0	0%	0	0%
<i>Burglary All</i>	16	9%	16	9%	44	14%	44	14%
Criminal Damage	15	11%	18	13%	21	10%	36	16%
Death Or Serious Injury Unlawful Driving	0	-	0	-	0	-	0	-
Drug Possession	195	77%	198	79%	320	82%	324	83%
Drug Trafficking	80	79%	80	79%	59	57%	59	57%
Homicide	0	-	0	-	0	0%	0	0%
Miscellaneous Crimes Against Society	55	41%	56	42%	72	43%	73	44%
Other Sexual Offences	6	13%	6	13%	9	12%	9	12%
Possession Of Weapons Offences	14	36%	15	38%	31	46%	32	47%
Public Disorder	46	17%	49	18%	74	17%	81	19%
Rape	1	9%	1	9%	0	0%	0	0%
<i>Rape & Other Sexual Offences</i>	7	13%	7	13%	9	9%	9	9%
Robbery Of Business Property	10	45%	11	50%	2	4%	2	4%
Robbery Of Personal Property	5	7%	5	7%	6	6%	6	6%
Shoplifting	149	29%	185	36%	266	29%	323	35%
Stalking And Harassment	6	11%	7	13%	22	15%	30	20%
Theft From Motor Vehicle	0	0%	0	0%	2	1%	2	1%
Theft From The Person	11	3%	11	3%	5	1%	5	1%
Theft Of Motor Vehicle	6	25%	6	25%	1	2%	1	2%
Vehicle Interference	0	0%	0	0%	0	0%	0	0%
Violence With Injury	54	34%	54	34%	97	21%	105	23%
Violence Without Injury	49	13%	58	16%	75	13%	103	18%
All Crime	778	17%	839	18%	1172	16%	1310	18%

All Crime Summary



Change:	This Month	-5%	FYTD	35%	Rolling 12 Month	29%
	Detection Rate FYTD:	17%			National Position:	42
	Positive Outcome Rate FYTD:	18%				





The chart on this sheet shows crime volumes from April 2014 to the present month, these are shown by the dark red line.

The dotted grey line shows the average amount of crimes per month across the period on the graph and the orange and yellow lines show the upper and lower control limits.

Control limits show points at which the data begins to be considered outside of the norm and "out of control". The dotted lines in orange and red show the control limits within two standard deviations of the mean, the solid lines show those within three standard deviations of the mean.

There are a number of patterns that can be seen on statistical process control (SPC) charts that indicate trends in the data;

1. **Nine (or more) points in a row on the same side of the mean** - a prolonged bias is present
2. **Six (or more) points in a row are continually increasing or decreasing** - a trend exists
3. **Two (or three) out of three points in a row are more than 2 standard deviations from the mean in the same direction** - there has been a significant change.

These charts are most useful with larger numbers and should be used with caution in relation to crime types where there are small numbers or irregular occurrences such as homicide, rape, arson etc.

Comparisons shown at the top of the chart compare levels to the last similar period (previous month, previous year to date, previous rolling 12 months), in some cases comparable data for the previous period may not be available.

Points of note (other than those included in the covering report)

Although this report covers Q1 and 2 member may wish to note that there has been a decrease in crime during September 2019 when compared to August 2019, however it is too early to assess whether this is a trend.

- September decrease compared to August -5%.

The percentage changes of note by rolling 12 month are;

- All Other Theft Offences (66% increase, more occurrences than 12 months previously).
- Violence Without Injury (50% increase, more occurrences than 12 months previously).

The percentage changes of note month on month are;

- Criminal Damage (80% increase from August).
- Bicycle Theft (45% decrease from August).
- Shoplifting (29% decrease from August).
- Theft from the Person (21% decrease from August).

Measure 2	Counter Terrorism				Assessment	SATISFACTORY						
AIM/RATIONALE	The aim is to provide the Force with an overview of activity undertaken to combat the terrorist threat facing the City and ensure the Force is providing an adequate response to mitigate this threat.											
Reason for Assessment	The force has sufficient resources to implement the 4P plan as envisaged as reported by Crime plan return.											
ACT & ARGUS DATA												
	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Number Act Awareness	180	237	229	44	22	214						
Percentage consider Force capable	100%	100%	100%	100%	100%	100%						
Number Argus Attendees	20	42	40	41	0	77						
Percentage consider Force capable	100%	100%	100%	100%	N/A	100%						
COUNTER TERRORISM INVESTIGATION DEMAND												
	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Number of Investigations processed by CT FMIU	11	5	15	5	3	8						
Trend	-	↓	↑	↓	↓	↑						
Year to Date Rolling Total	11	16	26	31	34	42						
OP LIGHTNING REPORTS (Hostile Reconnaissance)												
	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Op Lightning Reports 2016-17	20	6	12	20	17	14	21	9	12	18	11	22
Op Lightning Reports 2017-18	18	22	35	17	7	20	20	19	11	11	5	3
Op Lightning Reports 2018-19	11	8	11	11	18	8	7	10	17	6	9	11
Op Lightning Reports 2019-20	16	8	12	10	4	9						
Trend	↑	↓	↑	↓	↓	↑						

ANALYSIS

Overview of main activity for the Q2

Environmental: From 26th – 31st July Reclaim the Power held an environmental camp in Essex and engaged in direct action to highlight environmental and immigration campaigns. As part of their campaign they targeted several premises within the City of London to highlight environmental concerns around companies involved in fossil fuels and the financing of such projects.

- Hostile Reconnaissance: One report of hostile reconnaissance this month involved a time consuming investigation. 3 individuals were seen to be conducting reconnaissance of a train stations and its environs. Individuals identified and were on a close protection course run by a private company.
- Continued liaison with partner agencies around all forms of domestic extremism and CT matters. 33 pieces of CT/DE related intelligence shared with the wider CT network.
- Hostile reconnaissance: Company will share details of future courses with us to avoid a repeat of this incident.
- XRW/XRLW, Climate change, Animal rights and other protest are becoming the new emerging trends in the City of London during the last tasking period. These are quick to organise and are effective to their cause.
- Animal Rebellion were active in the City within October as Members will be aware but this is not covered by this reporting period.
- Review of crowded places in the City of London has identified 101 sites. This is a large increase on the previous figure due to a change in the criteria for identifying such sites.

Lightning Analysis

July: 10 Op Lightning reports were submitted during July 2019 - a 16% decrease from the previous month and below the average for July. **Aug:** 4 Op Lightning reports were submitted during August 2019 - a 60% decrease from the previous month and below the average for August. **Sept:** 9 Op Lightning reports were submitted during September 2019 – an increase of 5 from the previous month, but below the average for September

CT Awareness Update

July

ACT (Action Counters Terrorism) Awareness - 44

ACT Strategic - 27

Argus - 41

Document awareness - 29

SCAN - 25

Postal Awareness – 62

Aug

ACT Awareness - 22

Document awareness - 10

SCAN – 38

Figures lower this month due to summer holiday season. Total of 197 miscellaneous briefings at various sites around the City including business forums, business continuity groups, accommodation programme, security assessments and advice for Smithfield market.

Sept

Update: In addition to the 214 people who have received ACT awareness this month, a further 115 people have received modified CT awareness tailored to their specific needs. For example businesses at risk of protest, or businesses who have specific concerns or require specific advice. This means a total of 329 people received CT awareness briefings.

SERVATOR STATS 2018/19

	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Number of Deployments	*	*	*	66	88	51	49	51	60	60	58	85
Engagement (Key Servator messages given)	*	370	700	635	1265	955	650	530	710	745	1090	1530
Stop and Search	4	15	8	15	11	10	8	4	7	11	15	15
Positive stop searches	4	9	5	11	7	8	8	2	6	10	7	12
Arrests	4	11	5	9	5	10	9	3	8	14	5	12
Intels	6	5	4	1	6	3	4	3	4	9	13	7

*Data for these periods was not collated by the Servator team and cannot be retrospectively reported.

SERVATOR STATS 2019/20

	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Number of Deployments	97	82	67	95	96	66						
Engagement (Key Servator messages given)	2300	2190	3000	2440	2990	1530						
Stop and Search	5	5	4	1	8	4						
Positive stop searches	3	4	3	1	7	4						
Arrests	3	3	3	4	8	4						
Intels	7	5	5	7	9	5 (1CT*)						

*CT refers to Counter Terrorism.

Measure 3	Cyber Attack	Assessment	SATISFACTORY										
AIM/RATIONALE	The aim is to provide the Force with an overview of activity undertaken to combat the cyber crime threat facing the City and ensure the Force is providing an adequate response to mitigate this threat.												
Reason for Assessment	The 4P Plan for Cyber continues to be implemented with no evidence to suggest it is insufficient.												
CYBER CRIME NFIB REFERRALS													
	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Total
2015-16 (Month)	1	2	2	0	2	4	2	0	2	0	2	1	18
2016-17 (Month)	4	7	5	6	6	5	4	3	4	8	9	0	61
2017-18 (Month)	3	5	5	6	12	6	5	4	7	8	8	10	79
2018-19 (Month)	3	5	10	9	9	9	7	0	5	8	3	2	72
2019-20 (Month)	3	6	6	3	4	6							28
Change (Month)	0	+3	0	-3	+1	+2							
Trend	➡	⬆	➡	⬇	⬆	⬆							
ANALYSIS													
<p>NCSC 'UK Cyber Survey' The most prevalent online security considerations of those individuals surveyed were protecting privacy and avoiding money being stolen. 46% of those surveyed agreed that most information about how to be secure online is confusing whilst only 15% say they know a great deal about how to protect themselves online. 1 in 3 rely to some extent on friends/family (particularly children over 16) for help on cyber security –with older people being especially reliant. 70% believed that there were likely to be a victim of at least one specific type of cyber-crime over the next 2 years and most feel that there would be a big personal impact, and 37% agree that losing money or personal details over the internet is unavoidable these days.</p> <p>Cyber Security Breaches Survey 2019 Cyber-attacks are a persistent threat to businesses and charities. 32% of businesses and 22% of charities reported breaches/attacks in the last 12 months –with medium businesses (60%), large businesses (61%) and high income charities (52%) experiencing this to a greater degree. Phishing attacks, Impersonation of Organisation via email or online and Viruses/Spyware/Malware (inc Ransomware) were the most common types of attack. While fewer businesses have identified breaches or attacks than before, the ones that have identified them are typically experiencing more of them. Where businesses have lost data or assets through cyber security breaches, the financial costs from such incidents have consistently risen since 2017.</p> <p>Emerging Threats:</p> <p>Crypto currency is becoming a significant threat, particularly in respect of economic crime. SEROCU estimate that ¼ of Bitcoin transactions are related to criminality. Bitcoin is also the preferred medium for payment on the Dark Web. It is reasonable to anticipate an uplift in crime related to the use of crypto currency. We are working with NCA and MPCCU to increase our capability in this area. September saw 3 reports of Office 365 (email) compromises, 2 of which are linked. These are under investigation.</p> <p>1 instance of RYUK Ransomware. This type of Ransomware is subject of a national operation (Op Wilkinson); NCA have been informed. The attack affected about 170 (50%) of the company's servers. They have mitigated the threat and are returning to BAU. No ransom was paid.</p> <p>In August it was cited that criminal cryptocurrency as a significant emerging threat, particularly in relation to economic crime. NFIB have produced a report entitled "The Use of Alternative Cryptocurrencies in Relation to Fraud and Cybercrime" which describes in detail the threats posed.</p>													

CYBER GRIFFIN BRIEFINGS 2018/19												
	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Number of Cyber Griffin Events	-	-	1	1	1	1	1	0	1	3	1	4
Number of people attending Cyber Griffin	-	-	40	49	55	45	46	0	28	95	45	125
Satisfaction rate of attendees	-	-	-	-	87%	87%	87%	-	87%	91%	91%	100%
CYBER GRIFFIN BRIEFINGS 2019/20												
Number of Cyber Griffin Events	5	12	14	14	5	15						
Number of people attending Cyber Griffin	190	400	478	481	560	669						
Satisfaction rate of attendees	100%	97%	98%	98%	98%	99%						
ANALYSIS												
Satisfaction rates remain very steady and well above the national KPI of 75%. August has been a markedly quieter month than previous periods. We believe this is typical for the time of year and no reflection of the services themselves. October and November are already set to return to a full calendar of engagements with September representing a fuller month.												

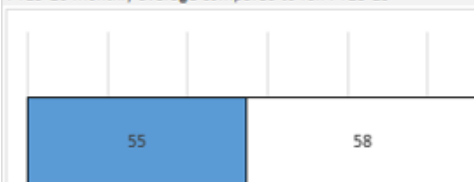
Measure 4	Fraud	Assessment	SATISFACTORY
AIM/RATIONALE	The aim is to provide the Force with an overview of activity undertaken to combat the fraud threat facing the City and ensure the Force is providing an adequate response to mitigate this threat.		
Reason for Assessment	This is graded as Satisfactory as the Force is increasing the impact it is having on Fraud committed within the City with a rise in victim compensation for this quarter.		

ANALYSIS

Pursue Disruptions from ECD Teams

Arrests, Voluntary Attendances, Charges / Summons, Cautions (inc conditional)

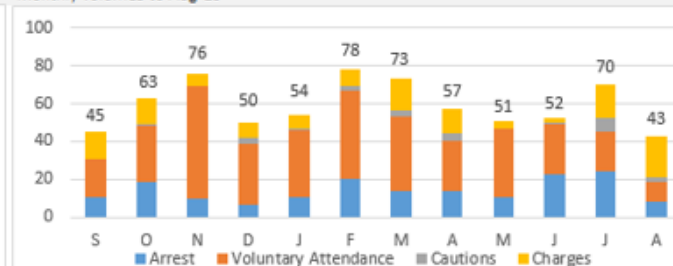
FY19-20 monthly average compared to full FY18-19



Rolling year trend to Aug-19 with predictive trendline

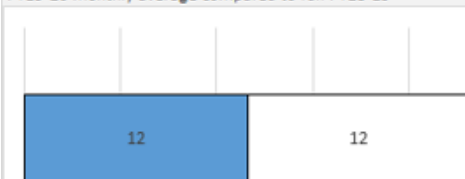


Monthly volumes to Aug-19



Convictions

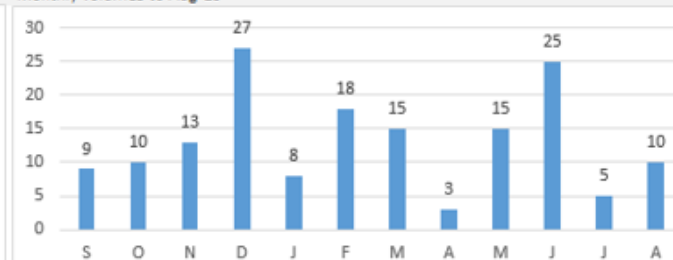
FY19-20 monthly average compared to full FY18-19



Rolling year trend to Aug-19 with predictive trendline

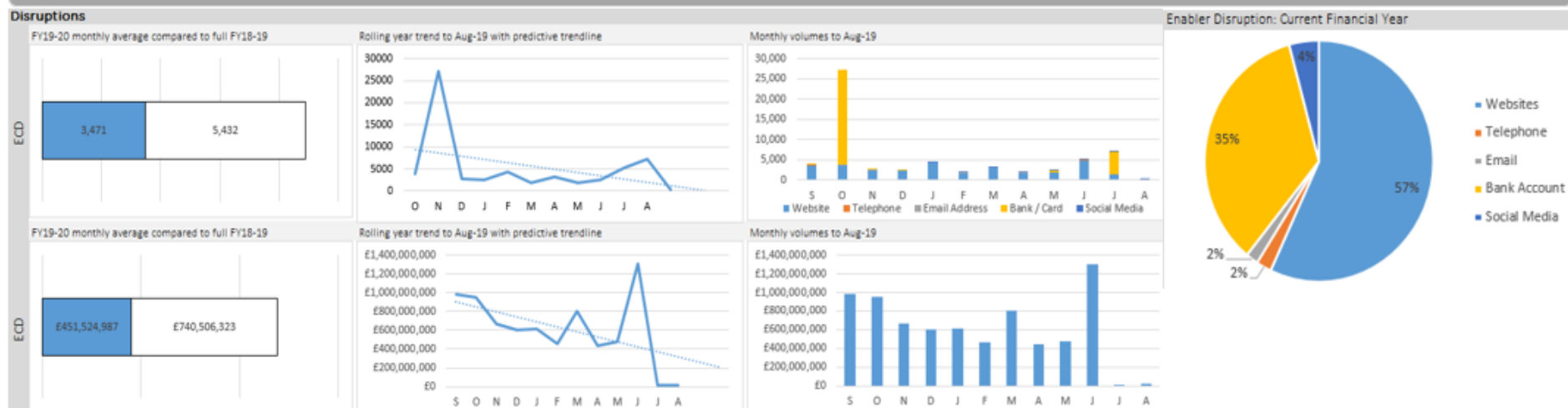


Monthly volumes to Aug-19



Pursue disruptions remain stable when comparing monthly averages for the current financial year, with last financial year. The continued use of voluntary attendance interviews over arrests remains as a more appropriate and ethical means of speaking to suspects for economic crime but this FY has seen a slight shift through a decrease in voluntary attendance [24 from 34 last FY] and an increase in arrests [16 from 13 last FY]. Cautions and charges have also increased on average slightly [cautions from 1 to 3 p/m and charges from 10 to 12 p/m]. Convictions continue to vary over time due to external factors.

Enabler Disruptions [Websites/Telephones/Emails/Bank Accounts and Cards/Social Media]



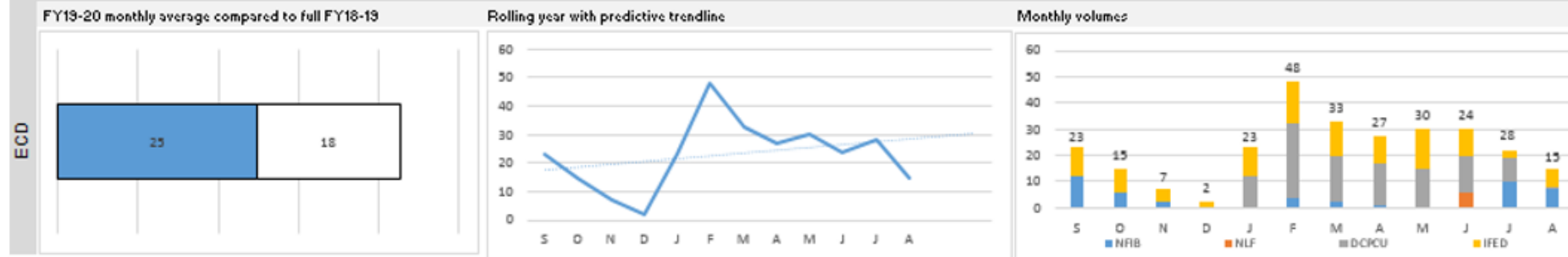
Although average figures show a current decline overall in the volume and value of disruptions work across ECD, performance in the current financial quarter shows some excellent work which is expected to revive the trends going forward.

Op ASHIKO in PIPCU refers to website takedowns. This work continues to be of high benefit and Nominet (UK internet domain registrar) reported that UK website domain suspensions have increased from 16,632 to 32,813 and credited PIPCU for the vast majority of those suspensions indicating the positive impact PIPCU has on this area of harm online. This data is reported a month in arrears so figures for August are missing but June reported the highest number of disruptions in the period [4,901] with an estimated value of over £1,300m.

DCPCU figures on disruptions for bank account and credit card fraud have now been included in this assessment. The large number of disruptions [23,402] in October 2018 related to the recovery of a large number of compromised card details from an illegal online trading site with an estimated value of £27m. July also saw a large number of bank accounts/cards disrupted by DCPCU totalling 5,499 disruptions with a value of £5.8m. Social Media disruptions by DCPCU are relatively new but have already exceeded 100 per month since April, with over 300 reported in July.

PROTECT and Engagement Events

Protect Events



The total number of protect events has decreased in Q2 but still exceed the monthly averages for the last financial year [25 compared to 18 last FY]. Forwarding rates for protect messages still exceed system averages on VisaV and data breaches messages on Twitter continue to show 'very high' engagement levels. MLIU is working with HMRC and FCA to provide support and advice to legitimate money service bureaus (MSBs) to help them identify money laundering and prevent unwittingly engaging in this criminality.

DCPCU have delivered; 59 engagement and awareness presentations to industry under protect, participated in 8 events promoting Take Five fraud awareness and campaign messages, presented at 24 educational event for business and business customers, and 17 staff approaches through Project VETANDA (referrals from partners in on criminals seeking to corrupt bank employees).

IFED continue to engage in an average of 10 stakeholder events per month. These cover prevention and protection advice, IFED/fraud awareness sessions including disseminating information on emerging threats and trends including internal fraud. Stakeholders include household names within the insurance industry and some specific sub-sectors. On the 23/05/2019, IFED hosted the force's first ever industry debrief event, focused on the unit's biggest case of commercial property fraud. The investigation related to a North London Organised Crime Group (OCG) who defrauded insurers out of more than £1M, concluded in November 2018 with the group receiving a collective 14 years in prison. The event was held at West Midlands Police Museum 'The Lock Up' and saw various members of the insurance industry attend, including insurers, loss adjusters, brokers, regulators, forensic experts and speech analysts. The feedback received was extremely positive, with many citing the value in holding such events and wanting more to be held for future cases.

PIPCU has engaged via media to promote IP crime issues, and the work of PIPCU including for the BBC. Op CREATIVE saw 3 new school Internet Service Providers from around the country have signed up to the Infringing Website List, following the London example set recently. This will protect children from reaching infringing websites whilst on school issues on devices. Other events are aimed at authors to protect themselves from IP crime and how to report should they need to. Recent press releases have focused on counterfeit make-up being advertised inadvertently by social media influencers.

NFIB have launched the courier fraud awareness campaign in September, kicked off by the Crimewatch appearance (see previous) and are preparing for the annual online shopping and auction campaign in the next quarter.

In mid-August The Times published a series of high-profile articles about Action Fraud by an investigative journalist who worked undercover at the Action Fraud call centre in Gourock for 6 days in June 2019.

Commander Baxter has since sought to engage with the media to ensure that members of the public continue to have confidence in Action Fraud and CoLP including appearing on Radio 4. Appropriate action is being taken both internally and an external review has been commissioned and is being led by Sir Craig Mackey.

Measure 5	Vulnerable Persons	Assessment	SATISFACTORY								
AIM/RATIONALE	The aim is to provide the Force with an overview of activity undertaken to protect vulnerable people within the City and ensure the Force is providing an adequate response to improve public safety.										
Reason for Assessment	Force has capability and capacity to deal with current volume in this area.										
VULNERABILITY STATS											
Strand		Mar 2019	Apr 2019	May 2019	Jun 2019	Jul 2019	Aug 2019	Sept 2019	Oct 2019	Nov 2019	Latest Trend
Adults at Risk		43	45	44	48	58	47	47			➡
Children at Risk		25	33	25	25	30	36	23			↓
Child Protection, Child Sexual Exploitation and Abuse & Missing Children	Child abuse	2	4	0	5	4	0	2			⬆
	CSE	1	1	0	0	0	0	0			➡
Domestic Abuse		20	8	12	12	8	12	20			⬆
Harmful Practices	FGM	0	0	0	0	0	0	0			➡
	Forced marriage	0	0	0	0	0	0	0			➡
	HBV	2	0	0	0	0	0	1			⬆
Hate Crime		16	16	12	12	16	16	22			⬆
Managing Violent Offenders		6	6	6	6	7	7	5			↓
Mental Health		35	47	46	59	79	71	63			↓
Mental Health & Suicides	Suicides	0	2	0	0	1	0	0			➡
	Attempted suicides	7	16	8	13	10	9	13			⬆
Modern Slavery & Human trafficking		5	1	4	0	2	0	0			➡
Prevent		0	2	0	1	3	2	0			↓
Rape and Other Sexual Offences	Rape	1	3	1	3	1	3	1			↓
	Other Sexual Offences	8	4	6	7	4	15	10			↓
Stalking & Harassment		15	10	5	12	10	9	11			⬆

ANALYSIS

Adults & Children at Risk

Indicator	Mar 19	Apr 19	May 19	Jun 19	July 19	Aug 19	Sept 19
Adult PPNs	43	45	44	48	58	47	47
	↑	↑	↓	↑	↑	↓	→
Children at Risk	25	33	25	25	30	36	23
	↑	↑	↓	↑	↑	↑	↓

- The number of Adult PPNs has remained the same for September as August
- Children at risk PPNs have decreased in September by 36% compared to August.

Domestic Abuse

Indicator	Mar 19	Apr 19	May 19	Jun 19	July 19	Aug 19	Sept 19
Domestic Abuse Crimes	20	8	12	12	8	12	20
	↑	↓	↑	↑	↓	↑	↑

Child Protection, Child Sexual Exploitation and Abuse & Missing Children

Indicator	Mar 19	Apr 19	May 19	Jun 19	July 19	Aug 19	Sept 19
Child Abuse	2	4	0	5	4	0	2
	↑	↑	↓	↑	↓	↓	↑
CSE	1	1	0	0	0	0	0
	↑	→	↓	→	→	→	→

- The volume of Child Abuse related crimes for the year remains low.
- CSE reporting remains low for the year to date.

Harmful Practices

Indicator	Mar 19	Apr 19	May 19	Jun 19	July 19	Aug 19	Sept 19
FGM	0	0	0	0	0	0	0
	→	→	→	→	→	→	→
Forced Marriage	0	0	0	0	0	0	0
	→	→	→	→	→	→	→
Honour-Based Abuse	2	0	0	0	0	0	1
	↑	↓	→	→	→	→	↑

- One Honour Based Violence crime has been recorded for the quarter, this is the only crime in this section for the year to date.

Hate Crime

Indicator	Mar 19	Apr 19	May 19	Jun 19	July 19	Aug 19	Sept 19
Hate Crime	16	16	12	12	16	16	22
	↑	↓	↓	↓	↑	→	↑

- There has been a slight increase in the number of hate crimes in the last month but not over the full reporting period.
- 16 of the 22 hate crimes have a racial element.

Managing Violent Offenders

Indicator	Mar 19	Apr 19	May 19	Jun 19	July 19	Aug 19	Sept 19
MAPPA nominals	6	6	6	6	7	7	5
	→	→	→	→	↑	→	↓

- The number of offenders managed each month within the first quarter has remained the same.
- There was a rise in one for July and this has remained for August with a decrease seen of 2 in September.

Prevent

Indicator	Mar 19	Apr 19	May 19	Jun 19	July 19	Aug 19	Sept 19
Prevent	0	2	0	1	3	2	0
	↓	↑	↓	↑	↑	↓	↓

- There have been 5 Prevent interventions made within the second quarter.

Mental Health & Suicides

Indicator	Mar 19	Apr 19	May 19	Jun 19	July 19	Aug 19	Sept 19
Mental Health	35	47	46	59	79	71	63
	↑	↑	↓	↑	↑	↓	↓
Suicides	0	2	0	0	1	0	0
	↓	↑	↓	→	↑	↓	→
Attempted Suicides	7	16	8	13	10	9	13
	↑	↑	↓	↑	↓	↓	↑

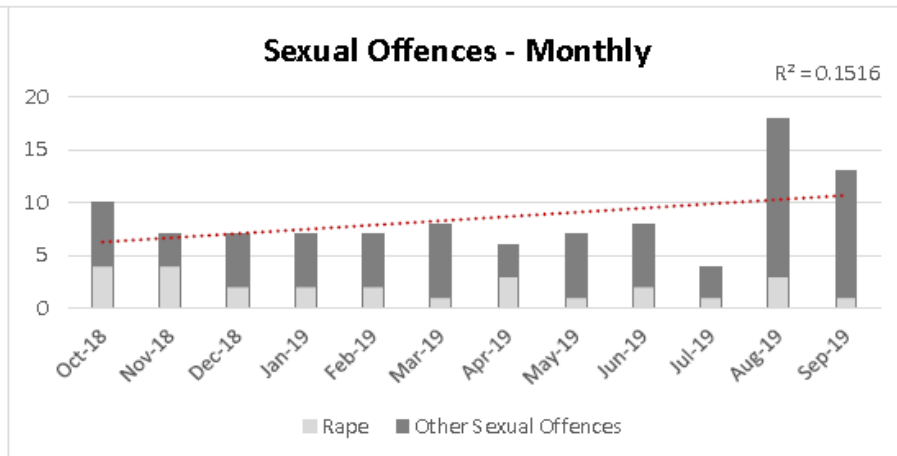
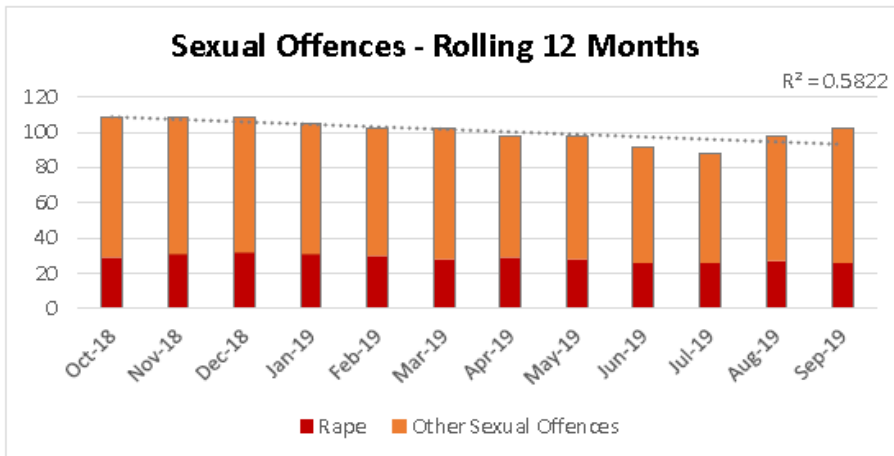
- After an increase in the first two months of the quarter the number of mental health referrals has fallen in September.

- There has been 3 suicides in Q1&2 in total but only 1 suicide in quarter 2 representing a slight reduction for the first half of the year.

Rape and Other Sexual Offences

Indicator	Mar 19	Apr 19	May 19	Jun 19	July 19	Aug 19	Sept 19
Rape	1	3	1	3	1	3	1
	↓	↑	↓	↑	↓	↑	↓
Other Sexual Offences	8	4	6	7	4	15	10
	↑	↓	↑	↑	↓	↑	↓

- The number of reported rapes has decreased in September from August from 3 to 1, other sexual offences have also decreased in September from August by 33%.



Change:

This Month

-28%

FYTD

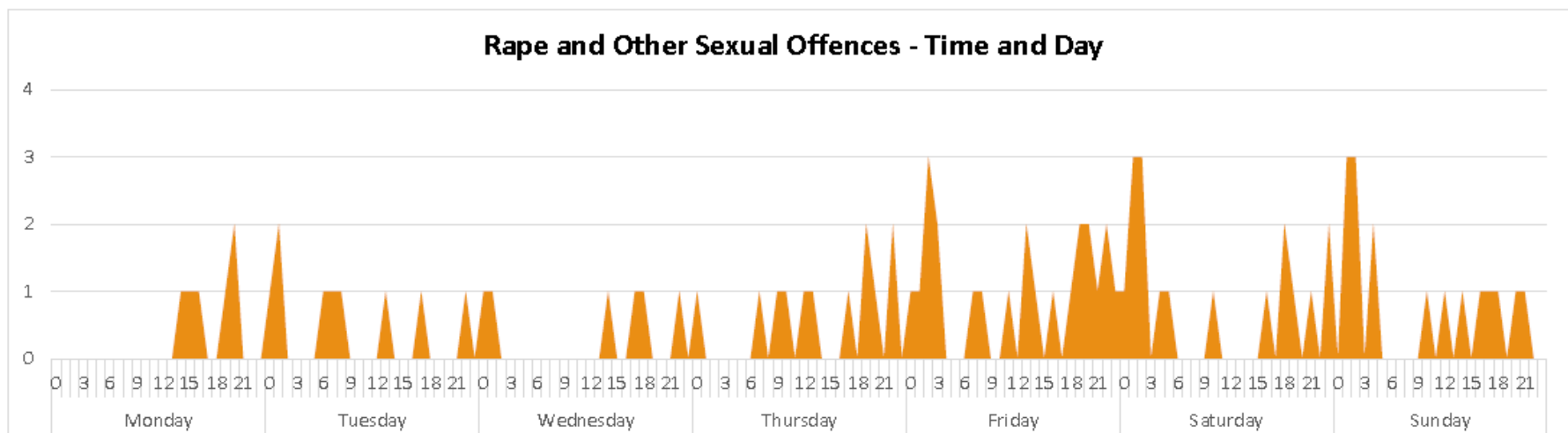
0%

Rolling 12 Month

-5%

Detection Rate FYTD:	13%
Positive Outcome Rate FYTD:	13%

National Position: 3



Modern Slavery & Human Trafficking

Indicator	Mar 19	Apr 19	May 19	Jun 19	July 19	Aug 19	Sept 19
MSHT	5	1	4	0	2	0	0
	↓	↑	→	↓	↑	↓	→

- There have been no reported cases of modern slavery in September and just 2 for the quarter.

Stalking & Harassment

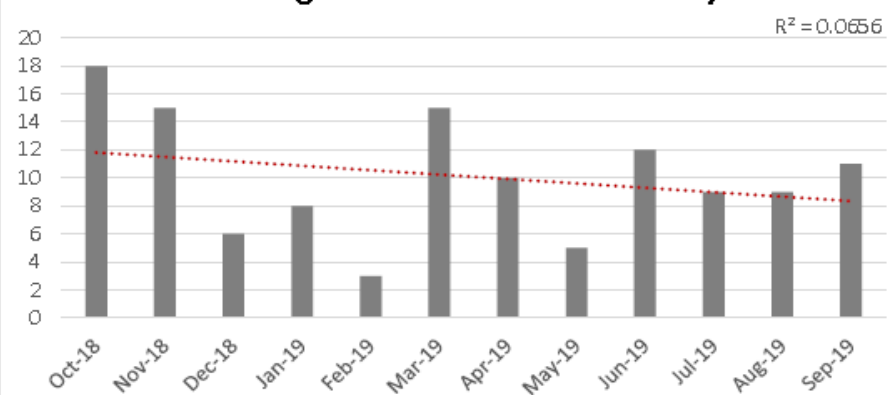
Indicator	Mar 19	Apr 19	May 19	Jun 19	July 19	Aug 19	Sept 19
Stalking & Harassment	15	10	5	12	10	9	11
	↑	↓	↓	↑	↓	↓	↑

- There has been a 22% increase in stalking and harassment cases in September in comparison to August, overall the level remains consistent with that reported in the first quarter.

Stalking and Harassment - Rolling 12 Months



Stalking and Harassment - Monthly



Change:

This Month 22%

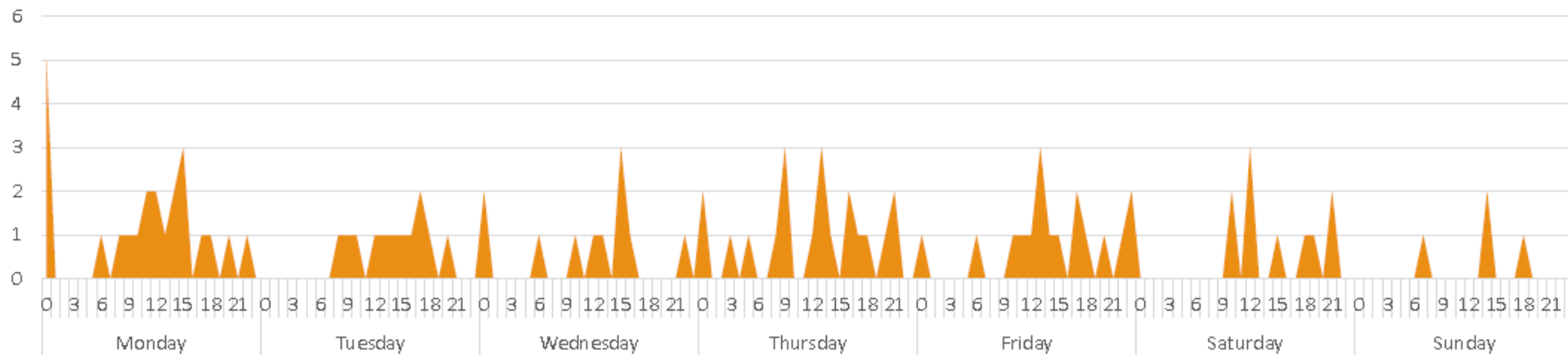
FYTD -32%

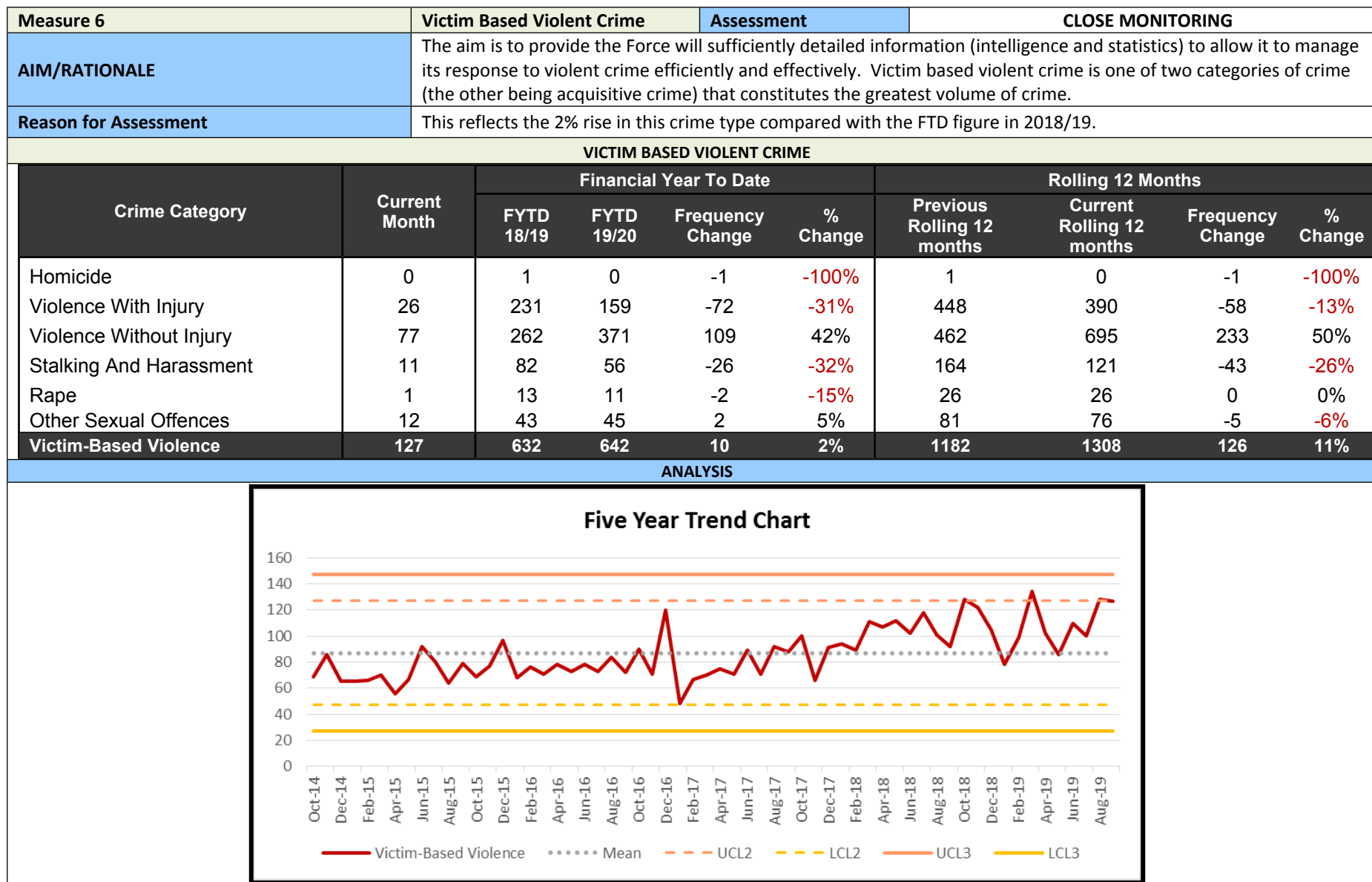
Rolling 12 Month -26%

Detection Rate FYTD: 11%
Positive Outcome Rate FYTD: 13%

National Position: N/A

Stalking And Harassment - Time and Day

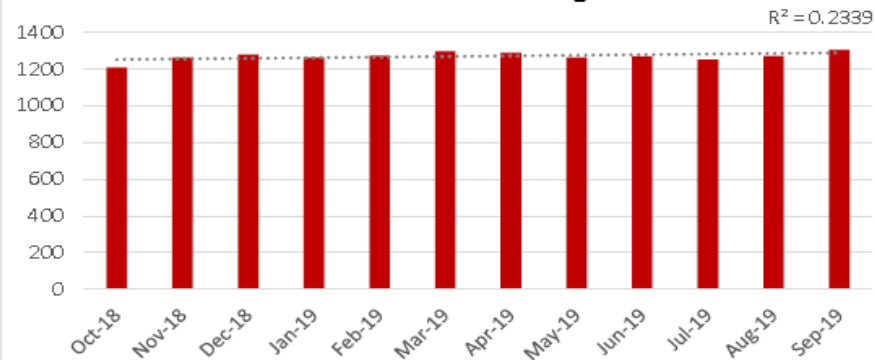




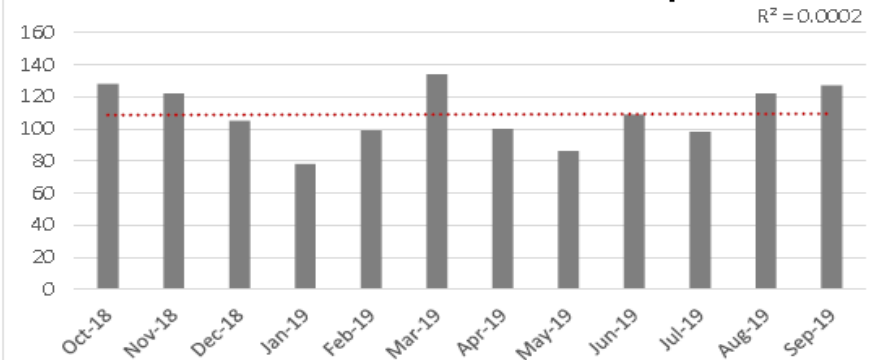
The chart on the previous page demonstrates that 'Victim Based Violent Crime' levels are variable; and have been increasing since May. Levels have been higher than the five year average for the past 8 months in a row.

Violence without Injury is showing a significant increase across both the rolling 12 months and the financial year to date.

Victim Based Violence- Rolling 12 Months

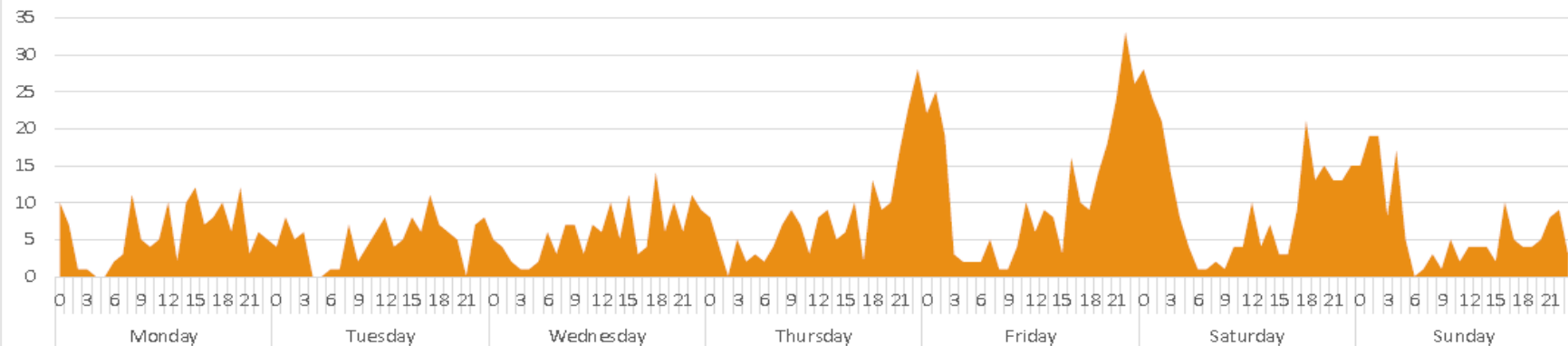


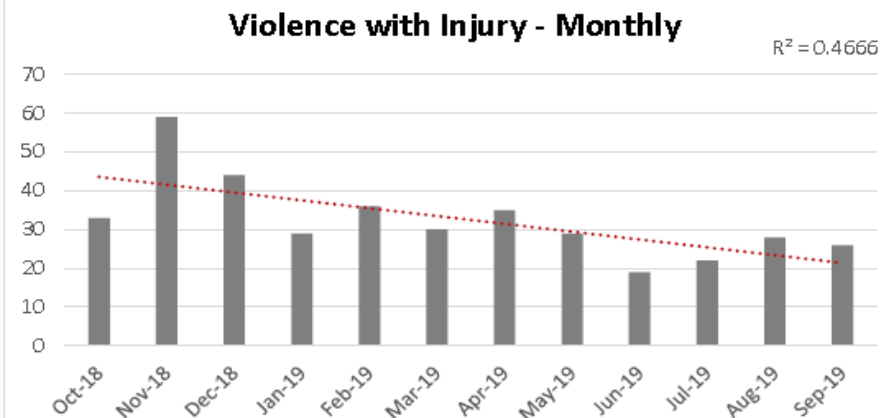
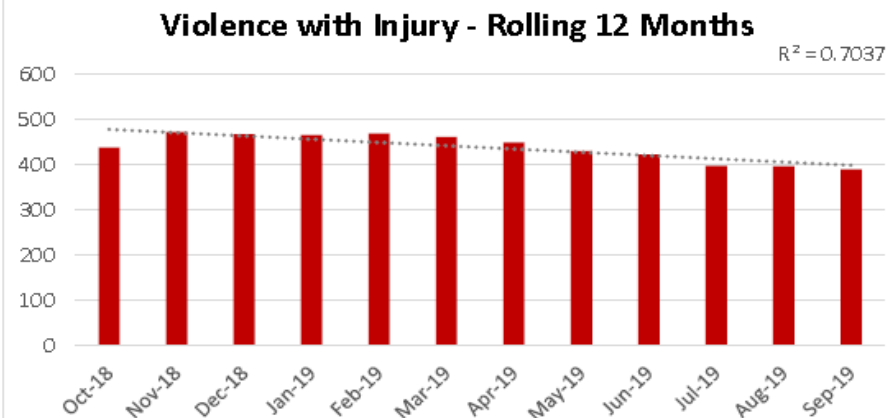
Victim Based Violence- Monthly



Change:	This Month	4%	FYTD	2%	Rolling 12 Month	11%
	Detection Rate FYTD:	18%			National Position:	N/A
	Positive Outcome Rate FYTD:	20%				

Victime Based Violence - Time and Day





Change:

This Month

-7%

FYTD

31%

Rolling 12 Month

-13%

Detection Rate FYTD:

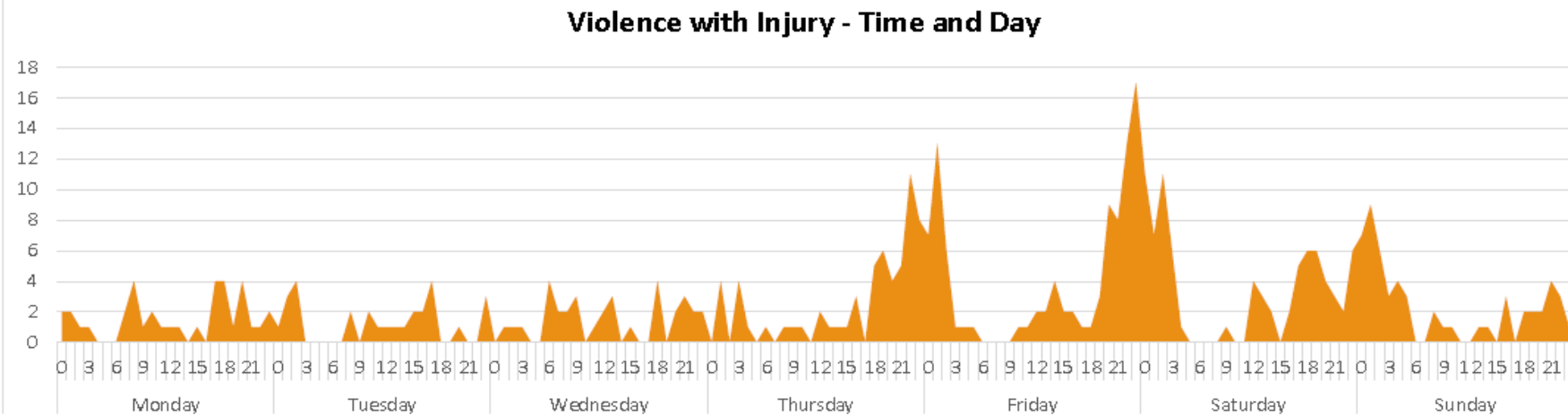
34%

Positive Outcome Rate FYTD:

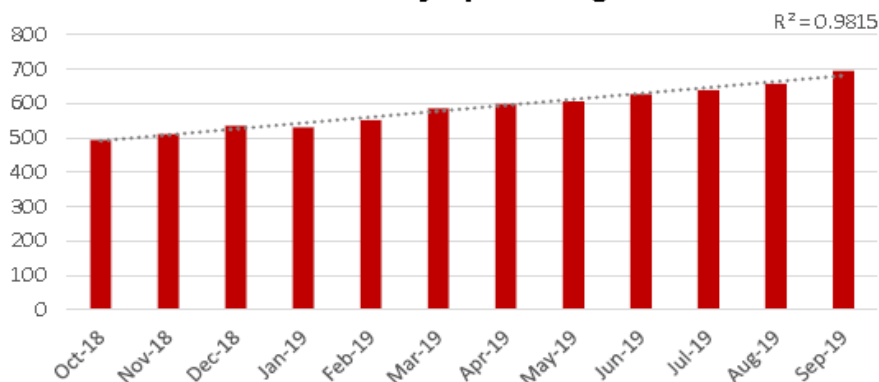
34%

National Position:

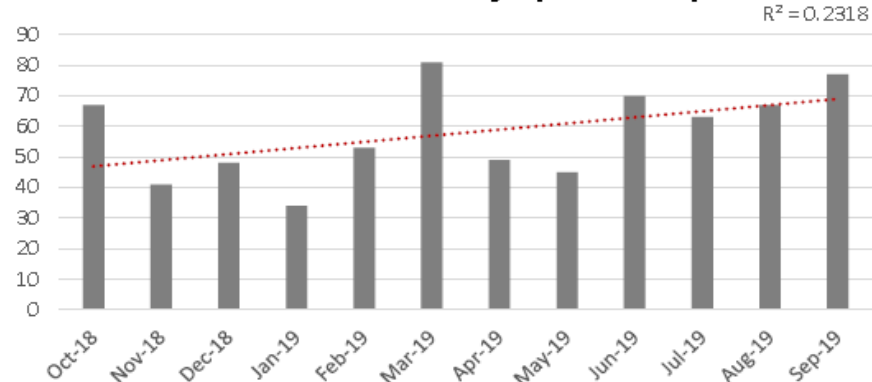
2



Violence Without Injury - Rolling 12 Months



Violence Without Injury - Monthly



Change:

This Month 15%

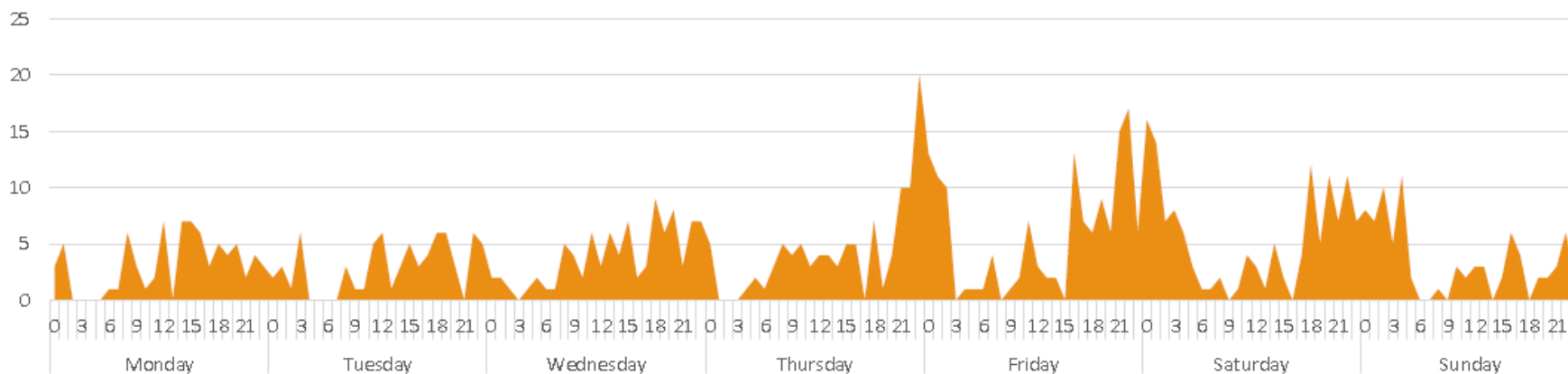
FYTD 42%

Rolling 12 Month 50%

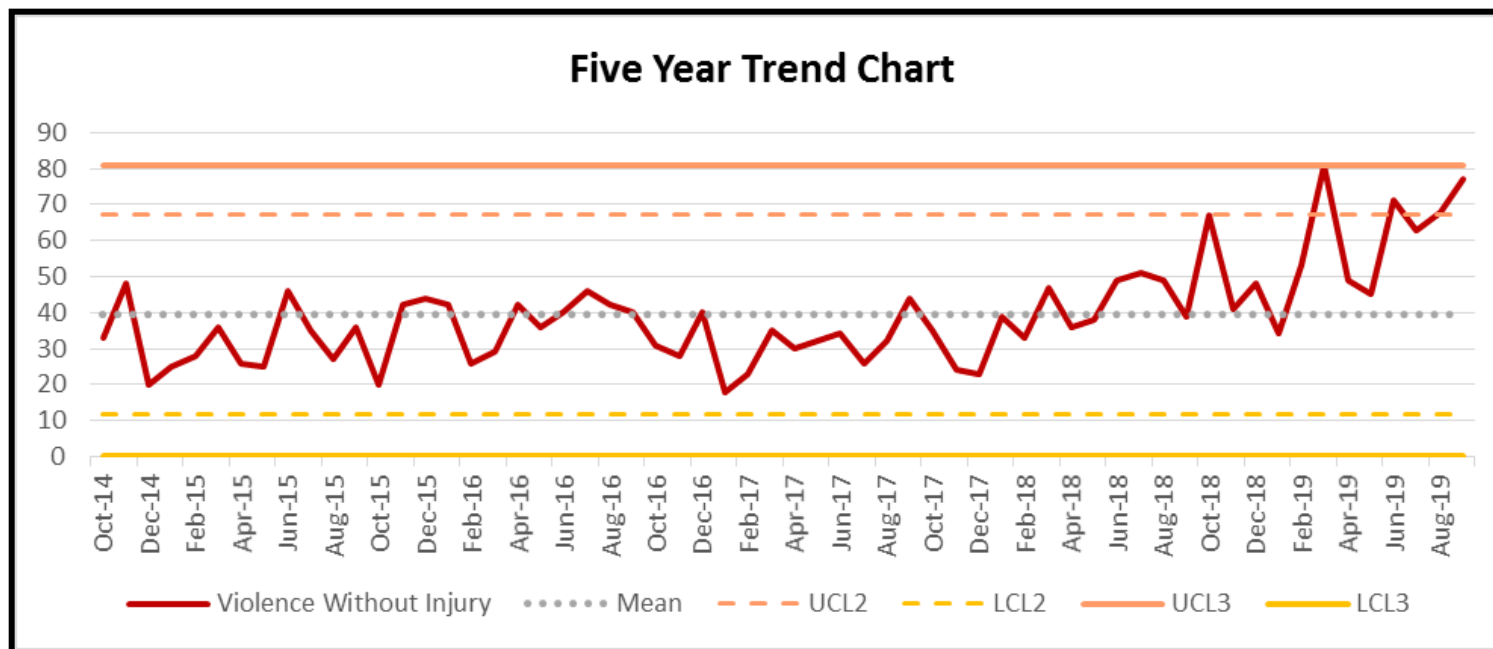
Detection Rate FYTD: 13%
Positive Outcome Rate FYTD: 16%

National Position: 27

Violence Without Injury - Time and Day

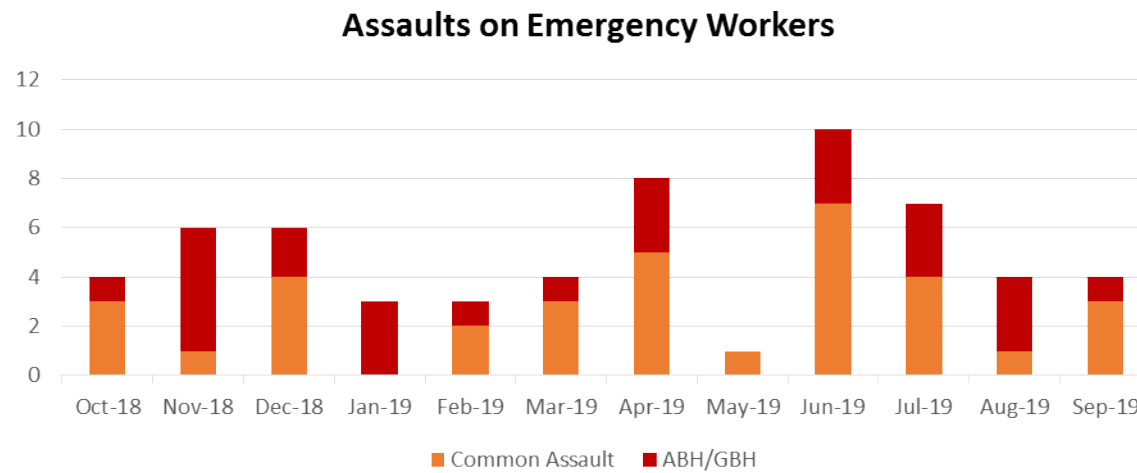


This crime type is the largest contributor to Victim Based Violent Crimes. Examining five years of data we can see that 'Violence Without Injury' has been consistently increasing since July. This is important to note given that historically November, December are peak reporting months owing to the link with the Night Time Economy and Christmas. CoLP will be developing an appropriate operational response as part of the Christmas Campaign.



When looking at the types of crime included in the Violence without Injury category for the financial year to date common assault remains the highest volume offence recorded as described in the covering report.

Assaults on Emergency Workers



'Assaults on a Constable or Other Emergency Worker' in June 2019 were at their highest for the past 10 years. Levels have been lower since June but there is a notable increase in the severity of these offences. There were 26 ABH/GBH offences in the last 12 months compared to 10 in the prior 12 months (+160% increase). Most injuries are obtained in the course of trying to detain a person, either as a direct confrontation or following a foot chase.

Measure 7	Roads Policing				Assessment				SATISFACTORY							
AIM/RATIONALE	The aim is to provide the Force with an overview of activity undertaken to improve road safety within the City and ensure the Force is providing an adequate response to mitigate this threat.															
Reason for Assessment	No issues highlighted within reporting period. Work continues on supporting delivery of the Road Danger Reduction Plan through enforcement, in partnership with measures put in place by the City of London Corporation.															
QUARTERLY KSI BREAKDOWN																
	2019/20 (YTD)				2018/19				2017/18				2016/17			
	FATAL	SER	SLIGHT	TOTAL	FATAL	SER	SLIGHT	TOTAL	FATAL	SER	SLIGHT	TOTAL	FATAL	SER	SLIGHT	TOTAL
PEDESTRIANS	0	7	26	33	0	26	67	93	2	26	80	108	1	24	80	105
PEDAL CYCLES	0	7	30	37	0	35	96	131	0	20	98	118	0	16	126	142
POWERED 2 WHEEL	0	2	15	17	1	9	64	74	0	11	63	74	1	7	58	66
CAR OR TAXI	0	1	12	13	0	2	34	36	0	1	56	57	0	1	41	42
P.S.V.	0	1	3	4	0	2	10	12	0	1	19	20	0	3	14	17
GOODS	0	0	1	1	0	0	2	2	0	1	2	3	0	0	3	3
OTHER	0	1	4	5	0	0	2	2	0	0	0	0	0	0	0	0
Total Casualties	0	19	91	110	1	74	275	350	2	60	318	380	2	51	322	375
PI Collisions	0	17	90	107	1	73	241	315	2	59	276	337	2	50	290	342
ROAD POLICING AND SMOOTHING TRAFFIC FLOW																
		2018/19					2018/19									
		Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total					
Other operations	Phones/ Seatbelts	66	62	73	111	312	35	17*			52					
Speeding in the 20mph zone	TOR	16	44	33	68	161	28	7*			35					
TOTAL		82	106	106	179	473	63	24*			87					
Number of vehicles seized from ANPR only		31	35	18	23	107	22	37			59					
Total number of vehicles seized from ANPR / No Ins or No DL or both		119	145	113	156	533	148	182			330					
Number of pre-planned enforcement and/or education operations targeting Large Goods Vehicle within City of London		34	33	27	22	116	19	17			36					
Number of LGV's stopped		294	194	192	155	835	51	165			216					
Number of LGV's stopped with offences		200	114	158	140	612	28	128			156					
Number of offences		455	270	364	232	1321	94	130			224					

ANALYSIS

*Data in the above table marked with asterisk does not include September data as currently the Force is not able to retrieve data for this month, this will be changed retrospectively in future reports once data becomes available.

Cycle Fixed Penalty Notices

The Force issues Fixed Penalty Notices to cyclists within the City as part of its work to ensure the roads are safe to use for all. Below is a list of the number issued by month this year as an oversight of the activity to police the activity of cyclists in line with other road users. Work continues to raise awareness amongst all road users.

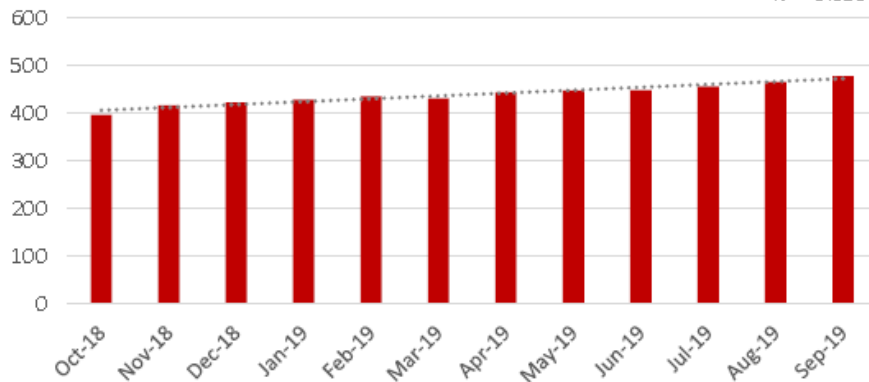
Cycle FPNs Issued												
	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
FPN's issued by month 2018-19	7	19	21	34	19	7	8	12	5	14	6	13
FPN's issued by month 2019-20	6	8	8	7	8	9						

No specific issues have been identified by Roads policing for this quarter. The department continues to work toward delivering Vision Zero in partnership with the Corporation.

Measure 8	Public Order & Protective Security				Assessment		SATISFACTORY						
AIM/RATIONALE	The aim is to provide the Force with an overview of activity undertaken to mitigate the threat facing the City through public disorder and ensure the Force is providing an adequate response to mitigate this threat.												
Reason for Assessment	Force response able to meet current levels of threat.												
PRE-PLANNED EVENT UPDATE													
	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	YTD
Pre-planned Events*	34	18	15	14	13	17							
Events requiring police presence	62	53	33	39	42	45							
Events requiring 5 officers or more	51	44	23	28	32	28							
CRITICAL INCIDENTS													
	2018/19						2019/20						
	Q1	Q2	Q3	Q4	Total		Q1	Q2	Q3	Q4	Total		
Critical Incidents	4	0	2		5	11	5	4					5
ANALYSIS													
Protests:													
The number of protests this year within the City are recorded within the table below:													
Protests Within City													
	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Total
2017-18 Protests	11	18	18	25	24	11	12	15	15	8	13	9	179
2018-19 Protests	5	11	17	13	9	22	9	13	12	4	12	7	134
2019-20 Protests	15	10	10	13	12	12							72
Trend	↑	↓	↓	➡	↑	↓							↓
The majority of the protests so far this year have been environmental in their nature with 22 protests falling into this category for the second quarter. So far this year there has been only one protest within the City relating to Brexit. Compared to last year there is a marginal decrease in protest activity from the same period, 72 protests this year compared to 77 in 2018/19.													
Within the second quarter the majority of the Environmental Protests have been linked to activity by Extinction rebellion, with 17 of the Environmental protest undertaken by this group.													

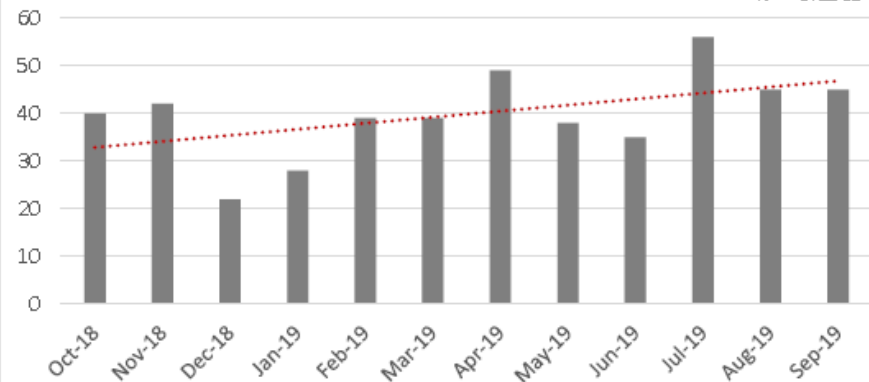
Public Disorder - Rolling 12 Months

$R^2 = 0.9503$



Public Disorder - Monthly

$R^2 = 0.2565$



Change:

This Month 0%

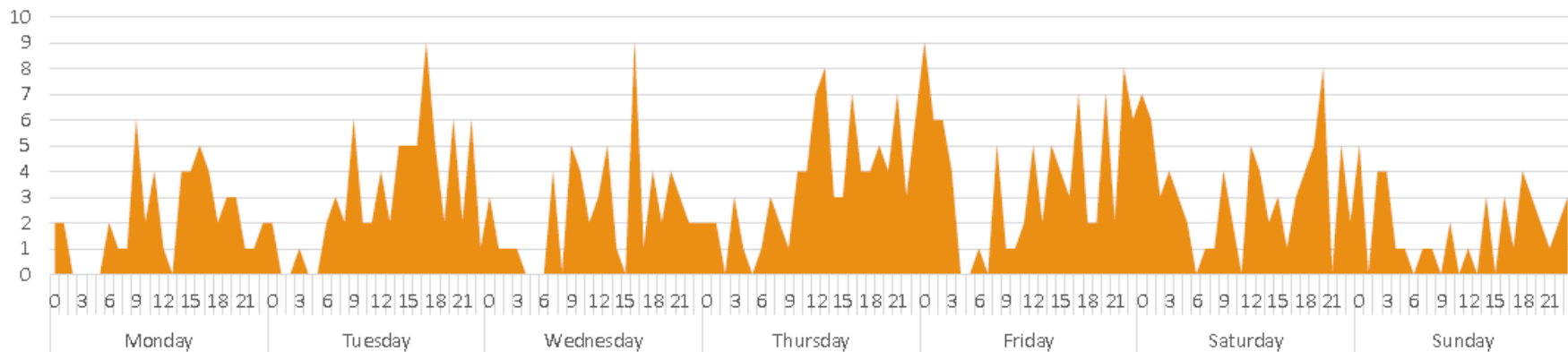
FYTD 21%

Rolling 12 Month 26%

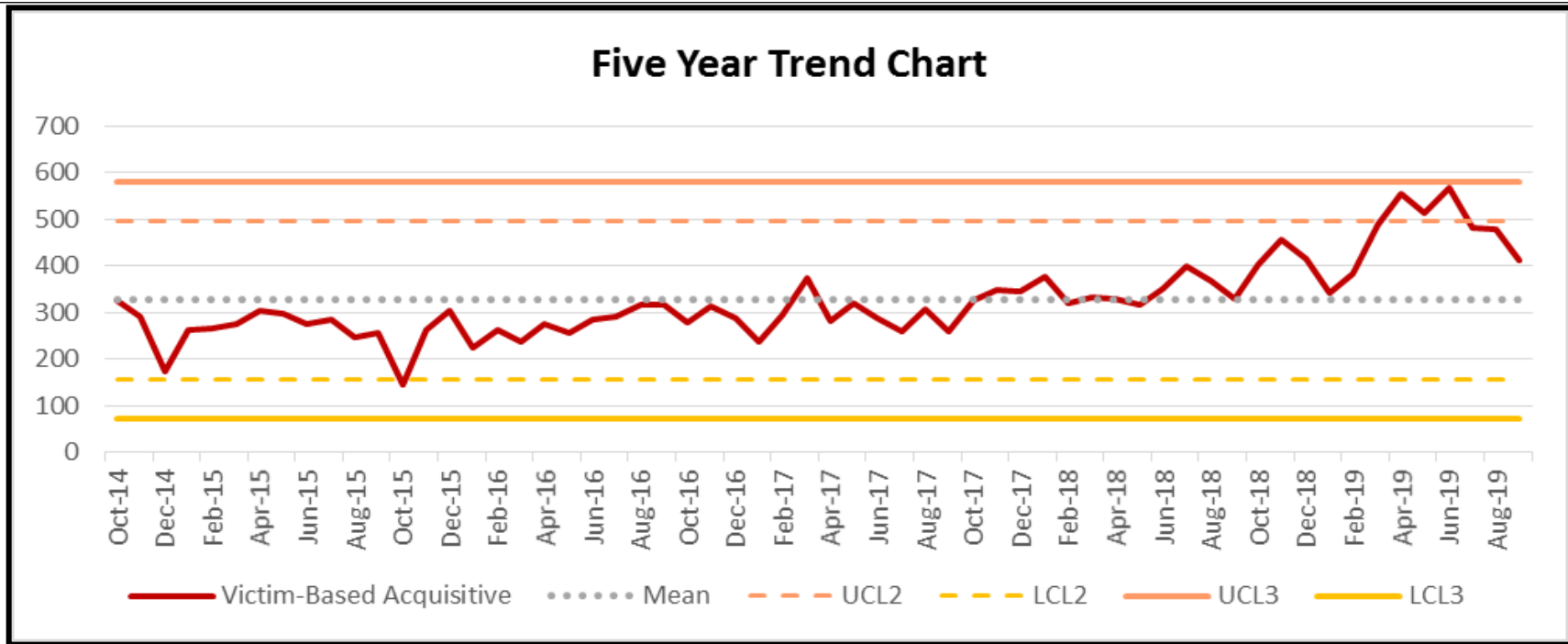
Detection Rate FYTD: 17%
Positive Outcome Rate FYTD: 18%

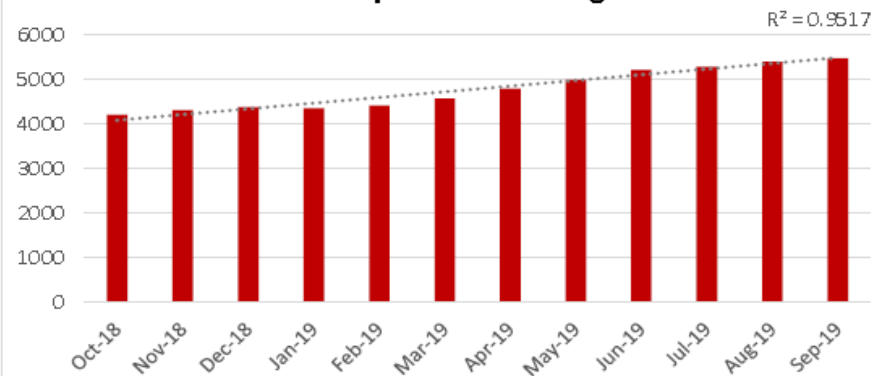
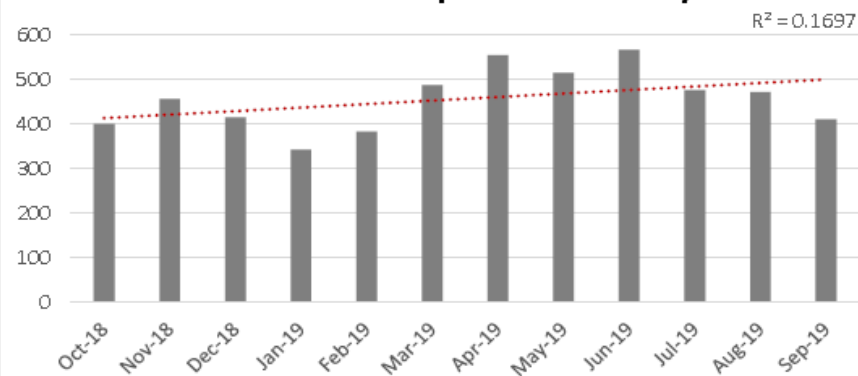
National Position: 32

Public Disorder - Time and Day



[illegible]

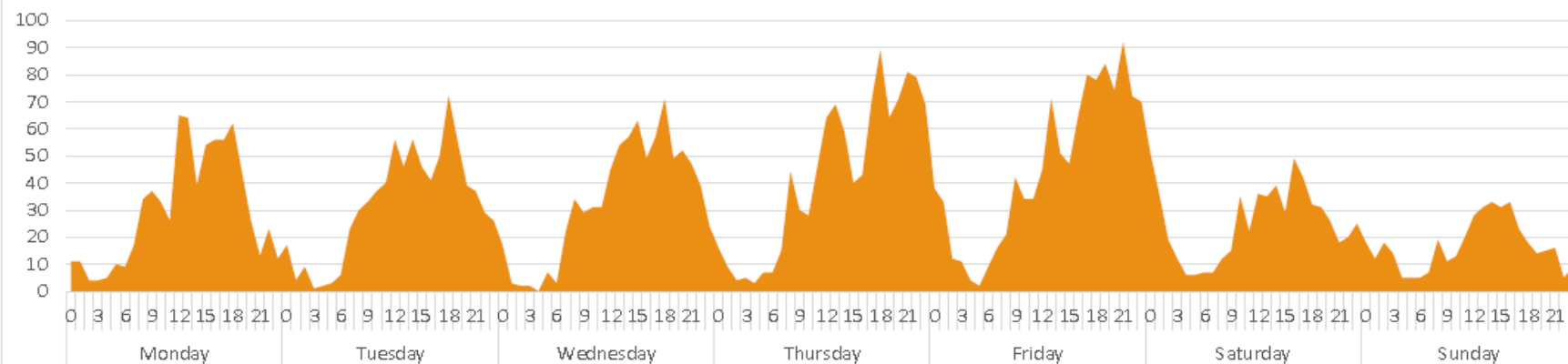


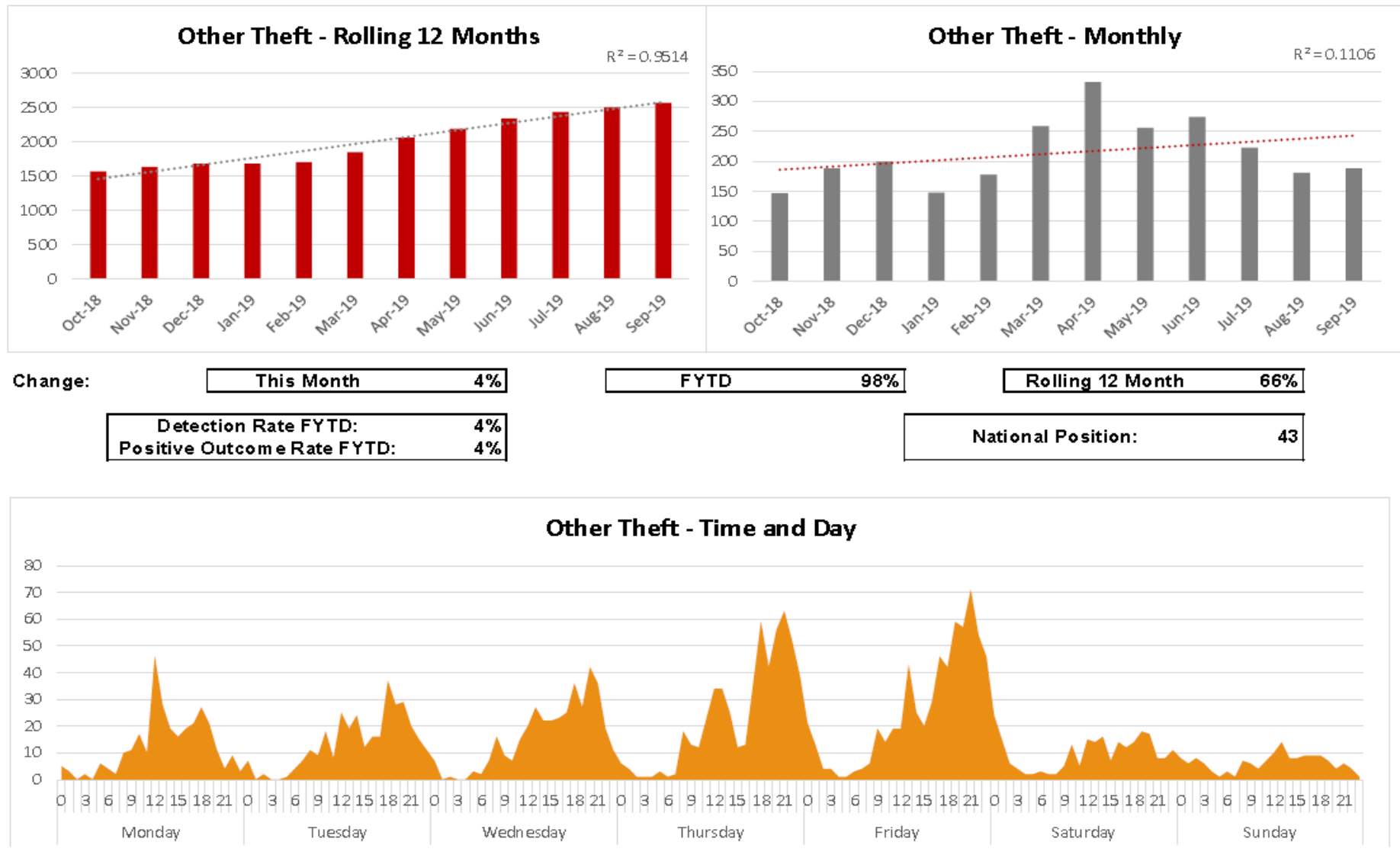
Victim Based Acquisitive- Rolling 12 Months**Victim Based Acquisitive- Monthly**

Change:

This Month -13%**FYTD 43%****Rolling 12 Month 33%**

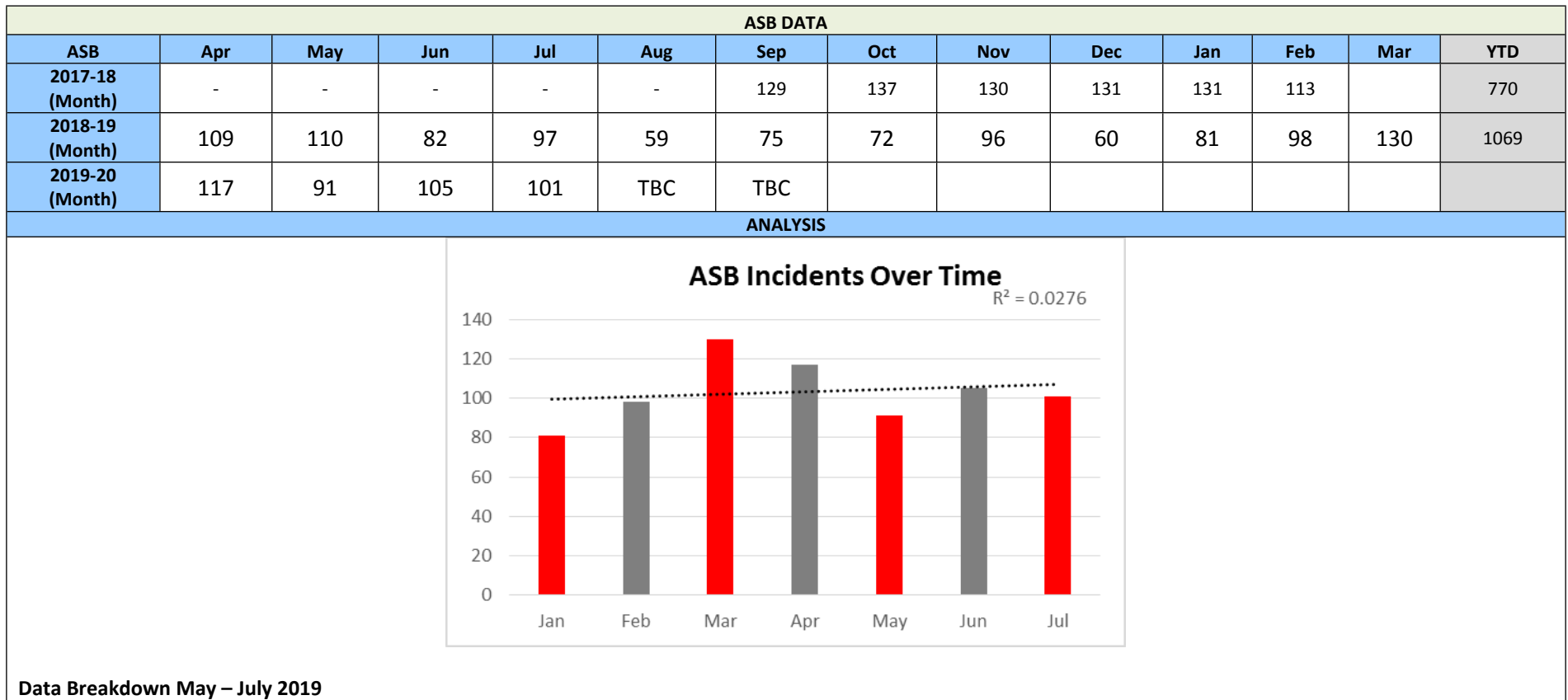
Detection Rate FYTD: 9%
Positive Outcome Rate FYTD: 10%

National Position: N/A**Victim Based Acquisitive - Time and Day**

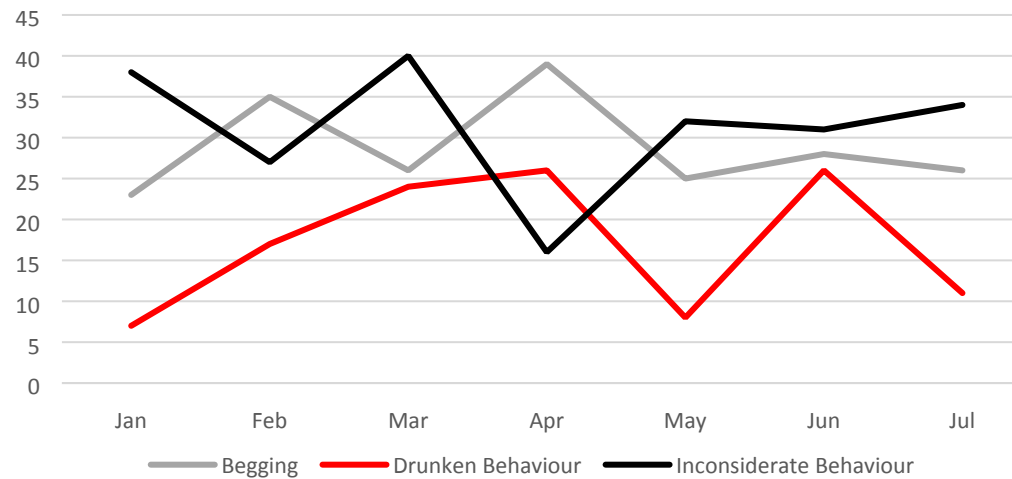


Measure 10	Victim Satisfaction	Assessment	NO INFORMAITON
AIM/RATIONALE	The aim of this measure is to provide the Force will sufficiently detailed information to manage the quality of its service provision to the victims of crime. Although victim satisfaction surveys are a statutory requirement, they provide an essential indicator of the level of professionalism the Force portrays and provides. The Force includes victims of acquisitive crime, which is not required by the Home Office, as without those victims, the sample size for the City of London would not be statistically valid.		
Reason for Assessment	Survey has been completed but is awaiting analysis.		
VICTIM SATISFACTION			
RESULTS			
The Victim survey has been undertaken but due to limited resources within PIU the current data set is still undergoing analysis and a detailed report will be provided to the February 2020 Performance and Resource Management Committee.			

Measure 11	Community Satisfaction	Assessment	REPORTED ANNUALLY
AIM/RATIONALE	This measure assesses the public’s perception of the Force, based on people who probably have not been a victim of crime but are part of the City of London community, be it in the capacity of resident, worker, or business. It will use a different survey from the Street Survey.		
Reason for Assessment	The Survey is taking place in Oct/Nov 2019		
COMMUNITY SATISFACTION RESULTS			
Strategic Development have liaised with the survey company undertaking the Community Street survey on behalf of the Force and have confirmed the use of the same question set as 2018 to allow direct comparison.			
The survey is being rolled out w/c 4 th November with provisional reporting of results mid-December following the same process and timescales as 2018.			



Top 3 ASB Incident Types 2019

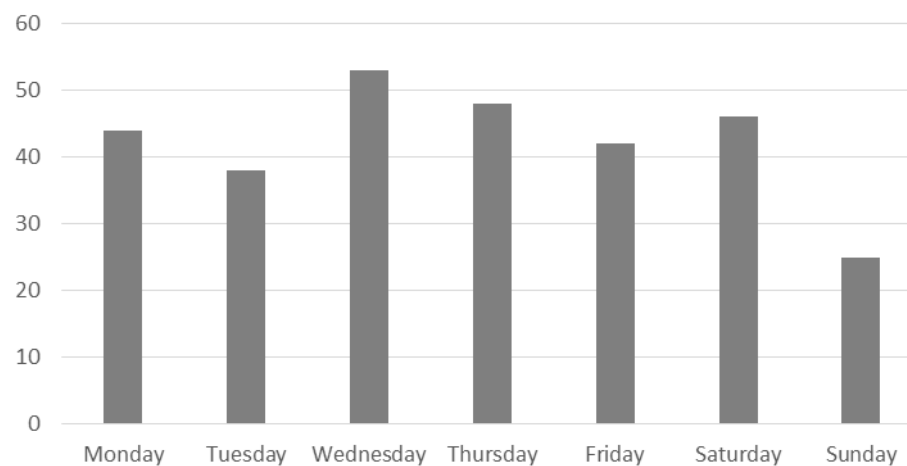


The above graph shows the month by month levels of each of the top 3 categories, begging is following the general trend of ASB incidents and both this and inconsiderate behaviour have remained fairly stable in terms of levels over the last 3 months.

Days of Week

On average there have been 3 ASB incidents reported a day in the current period. Incidents are more commonly reported on a Monday, Wednesday and Saturday but there is not specific pattern. These three days represent 46% of all incidents, Sunday is the day with the least incidents reported.

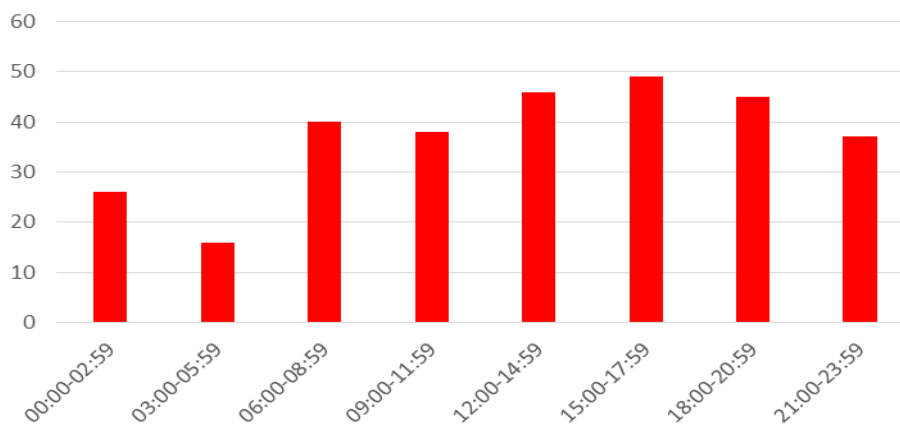
ASB Incidents by Day of Week



Time of Day

Reporting of all ASB incidents in the current period are shown in the below graph broken down by three hour periods across the day. Incident reports occur most frequently from the afternoon into the evening peaking between 15:00-17:59. After midnight reports drop off with very few occurring between 03:00-06:00.

ASB Incidents By Time of Day



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