

## 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. |

## PEEL 2018/2019

A national report by HMICFRS  
Published May 2019

This report makes 11 areas for improvement for the force, these are being progressed.

| Recommendations & Areas for Improvement |   | Status | Due Date  | Comment  |
|---|---|--------|---|--|
| 1                                       | <u>Area for Improvement</u><br>The force should improve its use of its crime-recording and management system to better manage its case files and investigative processes. | AMBER  | No deadline set by HMICFRS<br><br>December 2019 set to align with the next inspection | Improvements are required in the way the force allocates some crimes and records supervision and victim contact.<br><br>The following next steps have been identified: <ul style="list-style-type: none"> <li>• Identify any training needs.</li> <li>• Review the crime allocation process within the force resolution centre</li> <li>• Include any issues identified within future dip samples</li> </ul> |

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|---|---|--------|---|--|
|   |   |        |   | <ul style="list-style-type: none"> <li>Undertake a review of discontinued cases where the suspect has not been identified and the victim does not support the prosecution.</li> </ul>  |
| 2                                       | <u>Area for Improvement</u><br>The force should implement a process to get feedback from vulnerable victims.  | AMBER  | No deadline set by HMICFRS<br><br>December 2019 set to align with the next inspection | The Force will: <ul style="list-style-type: none"> <li>Review the current feedback process to establish if responses from victims can be improved.</li> <li>Benchmark with forces to establish their working practises</li> <li>Identify the other vulnerable victims to be contacted and incorporate into the feedback process.</li> </ul>  |
| 3                                       | <u>Area for Improvement</u><br>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. | AMBER  | No deadline set by HMICFRS<br><br>December 2019 set to align with the next inspection | HMICFRS are aware of the forces plans to implement Op Encompass – an initiative which directly addresses this issue which a number of other forces including the MPS are adopting.<br><br>The following next steps have been identified: <ul style="list-style-type: none"> <li>Dedicated Safeguarding leads [a requirement for Op Encompass] have been identified within City school and they are about to be trained by the force public protection unit.</li> <li>City schools are required to sign-up to Op Encompass which the force public protection unit is co-ordinating.</li> </ul> Following signup and training each school will then go-live. Force processes are already in place. |

| Recommendations & Areas for Improvement |  | Status | Due Date   | Comment  |
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| 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> | AMBER  | <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.</p> <p>The lifetime offender management team is now operational [May 2019].</p> <p>The following next steps have been identified:</p> <ul style="list-style-type: none"> <li>• Working practises are to be established</li> <li>• Current ancillary orders are being reviewed</li> <li>• Individual action plans against subjects of orders are in development to monitor compliance.</li> <li>• Applications for new ancillary orders to be progressed.</li> <li>• Performance monitoring to be reviewed at the force Serious and Organised Crime Board.</li> </ul> |
| 5                                       | <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>This links with the drug risk reduction strategy and the forces broader partner engagement.</p> <p>The following next steps have been identified:</p> <ul style="list-style-type: none"> <li>• Identify which partners we need to work with and develop engagement</li> <li>• Develop taskings and operations aligned to the risk reduction strategy.</li> <li>• Monitor activities at the force Serious and Organised Crime Board</li> <li>• A peer review is being organised.</li> </ul>  |

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|---|--|--------|---|---|
| 6                                       | <u>Area for Improvement</u><br>The force needs to address the deficit it has identified in its medium-term financial plan.                     | AMBER  | No deadline set by HMICFRS<br><br>December 2019 set to align with the next inspection | <p>The force and the Police Authority Treasurer have established a savings plan for 2018/2019 and secured a decision from the Police Authority for an additional 67 posts. There is currently a balanced budget for 2019/2020.</p> <p>A revised medium term financial plan is scheduled for Police Authority Board in the Autumn this will identify any projected deficits which need addressing.</p>   |
| 7                                       | <u>Area for Improvement</u><br>The force should ensure that effective external scrutiny takes place in relation to its use of force.           | AMBER  | No deadline set by HMICFRS<br><br>December 2019 set to align with the next inspection | <p>The Force has an Independent Advisory Group (IAG) and a Community Scrutiny Group (CSG). The effectiveness, membership and Terms of Reference of these groups is under review and the Force is proactively seeking new Members for both groups and a total of 12 people have applied for the CSG and 2 new Members have been recruited to the IAG. The Force is looking at the potential to have one group rather than 2.</p> <p>A draft report has been shared with the Chairman, Deputy Chairman, Police Authority Team and lead SIA members for Community Engagement and Vulnerability and feedback received. The Final report is due to the Police Authority Board in July 2019 to update on progress more fully.</p> |
| 8                                       | <u>Area for Improvement</u><br>The force should ensure that effective external scrutiny takes place in relation to its stop and search powers. | AMBER  | No deadline set by HMICFRS<br><br>December 2019 set to                                |   |

| Recommendations & Areas for Improvement |  | Status | Due Date  | Comment   |
|---|--|--------|---|---|
|   |  |        | align with the next inspection  |   |
| 9                                       | <u>Area for Improvement</u><br>The force should extend its unconscious bias training to all its workforce.   | AMBER  | No deadline set by HMICFRS<br><br>December 2019 set to align with the next inspection | A training package has already been developed, a timetable for roll out is to be set.<br><br>Completion of training by the workforce will be monitored and reported in force at PMG.  |
| 10                                      | <u>Area for Improvement</u><br>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<br><br>December 2019 set to align with the next inspection | The Force is: <ul style="list-style-type: none"> <li>Establishing the format and considerations other forces are utilising for their anti- corruption strategic threat assessments</li> <li>Identifying any data and intelligence gaps</li> <li>Considering a peer review by another force</li> </ul> |
| 11                                      | <u>Area for Improvement</u><br>The force should ensure that its counter-corruption unit: <ul style="list-style-type: none"> <li>has enough capability and capacity to counter corruption effectively and proactively;</li> </ul> | AMBER  | No deadline set by HMICFRS  | Capacity for counter corruption was included in a bid for posts to the Resources Allocation Sub Committee and Policy and Resources Committee [2 <sup>nd</sup> May 2019]. The overall bid was agreed.  |

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|   | <ul style="list-style-type: none"> <li>• 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</li> <li>• builds effective relationships with individuals and organisations that support and work with vulnerable people.</li> </ul> |        | December 2019 set to align with the next inspection | <p>Next steps have been identified:</p> <ul style="list-style-type: none"> <li>• Any additional posts will need to be recruited to and training provided as appropriate.</li> <li>• The force has identified software that enables more effective monitoring of force IT – a capital bid is being prepared.</li> </ul> |

## 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, these are being progressed.

| Recommendations & Areas for Improvement |  | Status | Due Date       | Comment   |
|---|--|--------|----------------|---|
| 1                                       | <p><u>Recommendation</u></p> <p>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 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.</p> <p>The use made of the system by police forces should be monitored and evaluated to identify best practice.</p> | AMBER  | September 2019 | <p>The timetable is likely to be influenced by the outcome of the contract negotiation with supplier of the Action/Know Fraud Service. The force has a Gold Group managing this and it is being reported on regularly to the Police Authority Board and Economic Crime Board.</p> |

| Recommendations & Areas for Improvement |   | Status | Due Date       | Comment  |
|---|---|--------|----------------|--|
| 2                                       | <u>Recommendation</u><br>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     | Monthly meetings are in place to drive progress.<br><br>Next steps have been identified: <ul style="list-style-type: none"> <li>• Creation of a new database to record outcomes</li> <li>• Conduct a test audit with forces in the South West region</li> <li>• Testing options to record positive (non-judicial) outcomes.</li> </ul>   |
| 3                                       | <u>Recommendation</u><br>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.  | WHITE  | August 2019    | This action is for the Economic Crime Strategic Board  |
| 4                                       | <u>Recommendation</u><br>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"> <li>• the aims and objectives of the agreement;</li> <li>• the funding arrangement;</li> <li>• accountability and governance processes; and</li> <li>• City of London Police's performance against the agreement.</li> </ul> | WHITE  | September 2019 | This action is for the Home Office, however the force is an active participant.<br><br>The Home Office ran a workshop with COLP and COL in March 2019 and has prepared a draft set of aims and objectives. Accountability and governance processes have been implemented through the Fraud and Cyber (National Systems) Board. A new performance framework has been jointly developed and was presented at the systems board on 11 April 2019. |

| Recommendations & Areas for Improvement |  | Status | Due Date   | Comment   |
|---|--|--------|------------|---|
| 5                                       | <p><u>Recommendation</u></p> <p>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, 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"> <li>• make clear the roles and responsibilities of police forces and regional organised crime units;</li> <li>• 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</li> <li>• define how fraud intelligence will be developed, disseminated and put to effective use by police forces and the National Fraud Intelligence Bureau.</li> </ul> <p>The implementation arrangements for the strategy should include clear communication and review processes.</p> | AMBER  | March 2020 | <p>In March 2019 COLP [as national lead] consulted 43 forces and 9 Regional Organised Crime Units. A revised strategy was circulated to policing and National Economic Crime Centre in mid-May 2019 and submitted for NPCC Crime Operations Coordination Committee approval in June 2019.</p>   |
| 6                                       | <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>  | AMBER  | March 2020 | <p>The force has worked with the College of Policing to create an Economic Crime hub for fraud practitioners. This hub provides access to guidance [including best practise] and information on forthcoming events and new articles. It also provides a forum for members of the hub to debate current issues.</p> <p>A successful bid to the Police Transformation Fund has secured funding to provide all forces with complex crime training.</p> |



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|---|---|--------|------------|---|
|   |   |        |            | <p>Next steps have been identified:</p> <ul style="list-style-type: none"> <li>• College of Policing to migrate existing knowledge resources to the new hub</li> <li>• An annual conference and engagement events are planned</li> <li>• There is an ongoing programme of work to identify and share best practise for the provision of victim care – a grading system is being considered that illustrates the confidence to which approaches work.</li> </ul>   |
| 7                                       | <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"> <li>• consulting with police forces to establish the uses to which these intelligence products are put; and</li> <li>• identifying any opportunities to improve the products' utility or reduce the burden on the National Fraud Intelligence Bureau in compiling them.</li> </ul> | AMBER  | March 2020 | <p><b>Force Profiles:</b></p> <p>Some consultation with forces has already been undertaken with more planned regarding the design of an interactive dashboard.</p> <p>The following changes are being implemented:</p> <ul style="list-style-type: none"> <li>• 6 monthly force profile will become annual for fraud and cyber – these profiles with focus on the intelligence picture as opposed to the current statistical information.</li> <li>• An interactive dashboard for forces in development, this to be updated monthly.</li> </ul> <p><b>Victim Lists:</b></p> |

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|   |  |        |                | <p>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> <p>Next steps:<br/>As new changes are made the force will seek feedback from relevant stakeholders to ensure expectations are met.</p> |
| 8                                       | <p><u>Recommendation</u><br/>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"> <li>• 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);</li> <li>• determine their response to National Fraud Intelligence Bureau disseminations for enforcement, ensuring consistency and clarity for victims of fraud; and</li> </ul> | AMBER  | September 2019 | <p>These recommendations will in part be met by the forces response to recommendation 6 above.</p> <p>In addition a planned capability survey will reveal all forces investigative policies.</p> <p>Next steps:<br/>A practitioners workshop is to be organised with invitations extended to all forces to determine best practise.</p>  |

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|---|---|--------|----------------|---|
|   | <ul style="list-style-type: none"> <li>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.</li> </ul>  |        |                |   |
| 9                                       | <u>Recommendation</u><br>By 30 September 2019, chief constables should publish their force's policy for responding to and investigating allegations of fraud (in relation to both calls for service and National Fraud Intelligence Bureau disseminations for enforcement).   | AMBER  | September 2019 |   |
| 10                                      | <u>Recommendation</u><br>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     | <p>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.</p> <p>The immediate ambition for the Fraud PROTECT strand will be to:</p> <ul style="list-style-type: none"> <li>Create a virtual network of Force Fraud PROTECT Officers</li> <li>Develop a mechanism to measure output and impact e.g. Engagement Impact Survey(s)</li> <li>Review and refresh the Fraud PROTECT Implementation Plan</li> </ul> <p>Review of national coordination of Fraud PROTECT and targeted PROTECT messaging through Action Fraud.</p> |
| 11                                      | <u>Recommendation</u><br>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  | AMBER  | September 2019 | <p>Previous guidance for calls for service has been assessed as fit for purpose. The guidance has been recirculated and the following next steps identified.</p>  |

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|   | <p>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:</p> <ul style="list-style-type: none"> <li>• responses to reports of fraud may adequately meet the needs of victims;</li> <li>• vulnerable victims should be identified and dealt with appropriately; and</li> <li>• reports of fraud should be efficiently referred to Action Fraud.</li> </ul> |        |                | <ul style="list-style-type: none"> <li>• Incorporation of Single Online Home reporting into the project.</li> <li>• An audit of Calls for Service responses in the South West region.</li> <li>• An audit of force policy within all regions.</li> </ul> <p>The results of audits to inform additional taskings.</p> |
| 12                                      | <p><u>Recommendation</u></p> <p>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.</p>  | AMBER  | September 2019 | Consultation is planned, comments to be incorporated the redesign.   |
| 13                                      | <p><u>Recommendation</u></p> <p>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.</p>  | WHITE  |                | <p>This action is for the Director General of the National Crime Agency, however, the escalation process is now ready for circulation.</p> <p>CoLP continue to engage with National Crime Agency tasking to ensure Fraud is appropriately represented.</p>   |
| 14                                      | <p><u>Recommendation</u></p> <p>With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime should:</p> <ul style="list-style-type: none"> <li>• carry out (and subsequently evaluate) a campaign to raise the public awareness of the existence and role of Action Fraud; and</li> <li>• provide chief constables with a description of the role of Action Fraud for uploading to force websites.</li> </ul>         | AMBER  | March 2020     | <p>An options appraisal for a campaign is being developed.</p> <p>A draft description of the role of Action Fraud will be issued to forces by the end of June 2019.</p>  |

| Recommendations & Areas for Improvement |   | Status | Due Date       | Comment   |
|---|---|--------|----------------|---|
| 15                                      | <u>Recommendation</u><br>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 satisfaction levels. Thereafter, information on performance against those indicators should be published.  | AMBER  | August 2020    | Draft performance indicators have been developed as part of the new Economic Crime Directorate performance framework presented at Economic Crime Board and the Fraud and Cyber National Systems Board (Home Office) in April. A change request will be submitted to the contractor for this change in reporting.<br><br>These performance results will then be published. |
| 16                                      | <u>Recommendation</u><br>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"> <li>• the role of Action Fraud;</li> <li>• 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;</li> <li>• how to obtain an update on the progress of their case;</li> <li>• 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</li> <li>• 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).</li> </ul> | AMBER  | September 2019 | All forces websites have been reviewed and material and information that is sent to victims of Fraud is being reviewed and developed/improved. It is acknowledged that this is one of the areas that has most impact on the victim experience and on CoLP reputation as providers of the AF service.  |
| 17                                      | <u>Area for Improvement</u><br>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.   | AMBER  | March 2020     | Existing processes and arrangements will be reviewed, however, the HMICFRS report does recognise the force establishment of a Victim Contact hub.   |

| Recommendations & Areas for Improvement |  | Status | Due Date   | Comment  |
|---|--|--------|------------|--|
| 18                                      | <u>Area for Improvement</u><br>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, however the force is reviewing existing arrangements with a view to improvement.<br><br>Identification and mapping are discussed at the force Serious and Organised Crime Board.   |
| 19                                      | <u>Area for Improvement</u><br>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 | This is an area of activity which the force is already engaged in. A Lifetime Offender management unit has been established and is reviewing offenders suitable for ancillary order as part of prevent tactics.                                  |
| 20                                      | <u>Area for Improvement</u><br>Chief constables should increase their force's use of ancillary orders against fraudsters.  | AMBER  | March 2020 |  |
| 21                                      | <u>Area for Improvement</u><br>Chief constables should ensure that their force complies with the Code of Practice for Victims of Crime when investigating fraud.   | AMBER  | March 2020 | Existing arrangements and processes are to be reviewed, however 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. |

## 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, these are being progressed.

| Recommendations & Areas for Improvement | Status | Due Date | Comment |
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| Recommendations & Areas for Improvement |  | Status | Due Date   | Comment  |
|---|--|--------|--|--|
| 1                                       | <u>Recommendation</u><br>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.   | AMBER  | November 2019 to align with the HMICFRS return visit | The Juvenile detainees SOP has been revised and published. Custody Officers and Dedicated Detection Officers have been instructed of the change in practise and this reinforced through custody refresher training.<br><br>Action required:<br>The fingerprint and non-intimate samples within a custody suite SOP although revised requires signoff and publication.                      |
| 2                                       | <u>Area for Improvement</u><br>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  | November 2019 to align with the HMICFRS return visit | A number of actions have been defined and are being progressed:<br><br>I. Monitor and review availability of fully accredited staff.<br>II. Custody overtime monitoring.<br>III. Monitor and review accreditation shifts worked in month -<br>IV. Trend reporting for Custody staffing to be produced.<br><br>Resilience of custody staffing to be fed into the force Transform programme. |
| 3                                       | <u>Area for Improvement</u><br>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  | November 2019 to align with the HMICFRS return visit | Cost of adaptations is being progressed and operations mitigations sought [disability, exercise yard and washing facilities].<br><br>Van docking arrangements are being examined.<br><br>Associated requirements are being captured for the new custody facilities within the new Police Estate  |
| 4                                       | <u>Area for Improvement</u>  | AMBER  | November 2019 to align with                          | A qualitative dip sample to be developed to measure compliance with policies and procedures results to be feedback into refresher training and Custody Management Group.   |

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|---|--|--------|--|---|
|   | 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.   |        | the HMICFRS return visit                             |   |
| 5                                       | <u>Area for Improvement</u><br>The force should manage the health care contract effectively, with escalation to a senior level when the service falls below the standard required.   | AMBER  | November 2019 to align with the HMICFRS return visit | Performance data to be defined, collected and analysed.<br><br>A risk register for custody to be complied.  |
| 6                                       | <u>Area for Improvement</u><br>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  | November 2019 to align with the HMICFRS return visit | A performance dashboard is to be produced for presentation to Custody Management Group.<br><br>Dip sampling and the establishment of Key Performance Indicators to be utilised as management tools in determining performance.            |
| 7                                       | <u>Area for Improvement</u><br>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 the custody records meet the required standards. | AMBER  | November 2019 to align with the HMICFRS return visit | Next steps have been identified: <ul style="list-style-type: none"> <li>• Complete dip sampling to identify issues.</li> <li>• Produce a series of 'show me good' documents for inclusion on the force good practise database.</li> </ul> |
| 8                                       | <u>Area for Improvement</u><br>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  | November 2019 to align with the HMICFRS return visit | Next steps have been identified:<br><br>Benchmark to determine how other forces approach and review.<br>Develop a qualitative dip sample.   |



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|---|---|--------|--|--|
| 9                                       | <u>Area for Improvement</u><br>Staff should routinely consider, and take any appropriate actions to preserve, detainees' privacy at the booking-in desk.  | AMBER  | November 2019 to align with the HMICFRS return visit | A mitigation has been identified [laptops utilised in a private side room]. This to be communicated to officers and included within Continual Professional Development safeguarding and welfare responsibilities.  |
| 10                                      | <u>Area for Improvement</u><br>The approach to managing some elements of risk should be improved. In particular: <ul style="list-style-type: none"> <li>• Detainees who are intoxicated should be placed on observation levels that include rousals.</li> <li>• Detainees' clothing and footwear should only be removed based on an individual risk assessment.</li> <li>• All custody staff should be involved collectively in shift handovers.</li> </ul> | AMBER  | November 2019 to align with the HMICFRS return visit | <u>Detainees who are intoxicated</u><br>Continual Professional Development sessions to be conducted [within safeguarding], Custody refresher training for 2019 to be reviewed and revised.<br><br>Qualitative dip sampling to include the assessment of risk records [observation / rousal records].<br><br><u>Detainees' clothing and footwear</u><br>Custody Manager to review current practise and identify necessary changes.<br><br><u>Collective in shift handovers</u><br>Custody Manger to review shift patterns and timings to assess opportunities for handover involving all Custody staff other partners on site). |
| 11                                      | <u>Area for Improvement</u><br>The force must consistently meet the requirements of PACE code C for the detention, treatment and questioning of suspects. In particular by:   | AMBER  | November 2019 to align with the                      | The following next steps have been identified:<br><br><u>Rights and entitlement notice</u>   |

| Recommendations & Areas for Improvement |  | Status | Due Date   | Comment  |
|---|--|--------|--|--|
|   | <ul style="list-style-type: none"> <li>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)</li> <li>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)</li> <li>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).</li> </ul>  |        | HMICFRS return visit                                 | <p>Out of date notices to be withdrawn and replaced with latest versions.</p> <p>Custody staff to be reminded of requirement to provide Rights &amp; Entitlement notice to all detainees.</p> <p>Include within refresher training and confirm practise by dip sample.</p> <p><u>Explain to detainees who are held 'incommunicado' the reasons for this.</u></p> <p>Custody staff to be reminded of requirements and this message reinforced in refresher training.</p>  |
| 12                                      | <p><u>Area for Improvement</u></p> <p>The force should strengthen its approach to conducting PACE reviews of detention by:</p> <ul style="list-style-type: none"> <li>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</li> <li>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</li> <li>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</li> </ul> | AMBER  | November 2019 to align with the HMICFRS return visit | <p><u>Requirements of section 107 of PACE – authorisation of acting / temporary inspectors</u></p> <p>The following activity and tasks are identified below:</p> <p>Human Resources to review Acting and Temporary Duties SOP (Promotion (Temporary and Acting) to ensure it complies with Section 107 of PACE for Duty (PACE) Inspector responsibilities with authority being given in advance of duty and not retrospectively.</p> <p>Dip samples to confirm compliance.</p> <p><u>Reviews for detainees held in the custody suite on behalf of others forces</u></p> <p>Custody to consult with Learning &amp; Development regarding training need requirement / input for PACE reviewing role.</p> |

| Recommendations & Areas for Improvement |  | Status | Due Date   | Comment   |
|---|--|--------|--|---|
|   | sleeping, as required by paragraph 15.7 of PACE code C.  |        |  | <p><u>Accurate and detailed entries on the custody detention log</u></p> <p>To be included within refresher training and confirm by dip sample.</p>   |
| 13                                      | <p><u>Area for Improvement</u></p> <p>Staff should conduct and record standardised daily cell checks</p>   |        | November 2019 to align with the HMICFRS return visit | A template check list for routine daily cell and suite inspections for use by Custody staff is in development.  |
| 14                                      | <p><u>Area for Improvement</u></p> <p>The force should ensure that all custody staff take part in an annual fire drill</p>   |        | November 2019 to align with the HMICFRS return visit | <p>The Custody Manger is planning sufficient Custody fire exercises per year to ensure all officers have participated in at least 1 exercise per rolling year.</p> <p>Custody Manager to instigate a process for recording details of specific officers involved in any fire drill, live incident, or other business continuity exercise which occurs involving Custody (by individual name not just Group).</p>                            |
| 15                                      | <p><u>Area for Improvement</u></p> <p>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.</p> <p>In particular:</p> <ul style="list-style-type: none"> <li>The force should collate accurate data concerning the use of force and ensure that all incidents are adequately recorded on custody records.</li> <li>All staff involved in incidents in which force is used should complete individual use of force forms.</li> </ul> | AMBER  | November 2019 to align with the HMICFRS return visit | <p>A reconciliation process to be established; Pronto use of force records to Custody entries.</p> <p>Dip sampling to include reference to Use of force forms, custody entries and CCTV &amp; body worn video recordings.</p> <p>Develop monitoring for presentation to Custody Management Group [Dashboard].</p> <p>Review Body Worn Video SOP and provide explicit references as to when it must be turn on [inside/outside custody].</p> |

| Recommendations & Areas for Improvement |  | Status | Due Date   | Comment  |
|---|--|--------|--|--|
|   | <ul style="list-style-type: none"> <li>Incidents involving the use of force should be quality assured, including cross-referencing with closed-circuit television.</li> </ul>  |        |  |  |
| 16                                      | <u>Area for Improvement</u><br>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.  | AMBER  | November 2019 to align with the HMICFRS return visit | Previous plans for an exercise yard [not approved owing to the original plans to move from Bishopsgate] to be revised given the current timelines for a new custody build.<br>Current practise re: toilet paper issue and footwear issue to be reviewed. |
| 17                                      | <u>Area for Improvement</u><br>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.   | AMBER  | November 2019 to align with the HMICFRS return visit | Existing contractual arrangements [provided via CoL children services] to be reviewed.   |
| 18                                      | <u>Area for Improvement</u><br>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. | AMBER  | November 2019 to align with the HMICFRS return visit | Draft and agree a set agenda for future meetings [to be scheduled].  |
| 19                                      | <u>Area for Improvement</u><br>The provision of the planned embedded seven-day pilot scheme should be introduced as soon as practically possible.  | AMBER  | November 2019 to align with the HMICFRS return visit | Expansion of liaison and diversion team to be progressed with the East London Foundation Trust.  |

| Recommendations & Areas for Improvement |   | Status | Due Date   | Comment   |
|---|---|--------|--|---|
| 20                                      | <u>Area for Improvement</u><br>The recording of release arrangements, to ensure that detainees are released safely, should be more detailed.  | AMBER  | November 2019 to align with the HMICFRS return visit | This to be included within Continuing Professional Development / refresher training.<br><br>Dip sampling to confirm leaflets supplied / petty cash offered [fares]. |
| 21                                      | <u>Area for Improvement</u><br>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'. | AMBER  | November 2019 to align with the HMICFRS return visit | Dip sampling to confirm compliance.   |
| 22                                      | <u>Area for Improvement</u><br>Detainees should be moved to escort vehicles in a way which protects their dignity and privacy.  | AMBER  | November 2019 to align with the HMICFRS return visit | Existing arrangements to be reviewed.   |

# 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, these are to be progressed.

| 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> | WHITE  | December 2019 | <p>Progress is dependent on an action assigned to the NPCC lead and College of Policing by HMICFRS; this is currently pending.</p> <p>The force lead on Vulnerability has been sighted on this action and maintains a watching brief.</p> |
| 3                                       | <p><u>Recommendation</u></p> <p>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.</p>  | WHITE  | August 2019   | <p>Practise guideline 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.</p>               |

| Recommendations & Areas for Improvement |   | Status | Due Date    | Comment   |
|---|---|--------|-------------|---|
|   | <p>If forces find any deficiencies in their triage services, they should take steps to address them as soon as reasonably practicable.</p> <p>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>   |        |             |   |
| 4                                       | <p><u>Recommendation</u></p> <p>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.</p> <p>If forces find any deficiencies in their training programmes, they should take steps to address them as soon as reasonably practicable.</p> <p>Where forces invite outside organisations to train staff, they must make sure its content and quality are checked against College of Policing APP.</p> | AMBER  | August 2019 | <p>Mental health training is delivered within the vulnerability training package which was designed by the College of Policing.</p> <p>Learning and Development are undertaking a review of this training and a request for input was taken to the Vulnerability Working Group February 2019.</p> <p>Findings from the review will initially reported to Vulnerability Working Group before submission to Training Improvement Board.</p> |

# Joint Inspection of the Handling of Cases Involving Disability Hate Crime

A national joint report by HMICFRS and HMCPSi

Published October 2018

This report makes 4 recommendations for the police now complete.

| Recommendations & Areas for Improvement |  | Status       | Due Date  | Comment  |
|---|--|--------------|---|--|
| 1                                       | Chief constables should ensure that the system used to transfer information to the CPS regarding the request for charging advice clearly identifies cases where, in accordance with the definition, the police consider a case to be a hate crime. | NEW<br>GREEN | No deadlines have been set within the published report.<br><br>Set for March 2019 | High risk, high harm, hate crime cases are managed by the Public Protection Unit; such cases are rare and well managed through the CPS process.<br><br>The force utilises a national form [MG3] to record this type of case; the form includes the option of 'hate crime'. The role gatekeeper has been reinstated to review files before forwarding to Administration of Justice, this includes MG forms. |



# 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><br/>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><br/>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> | AMBER  | October 2018<br><br>Extended February 2019<br><br>Now July 2019 | <p>The Head of Public Protection has produced new role and responsibilities [Crime Screening, Allocation and Finalisation Force Policy &amp; Standard Operating Procedure] ahead of the implementation of the new Force Resolution Centre to ensure appropriate processes are embedded; this includes flagging.</p> <p>The force resolution centre went live 1<sup>st</sup> April 2019 and the deadline for this action has been extended to July 2019 by the Force to check and ensure that compliance with the guidance is bedded in.</p> <p>The Performance Information Unit have 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><br/>Our inspection shows that some hate crime victims get a better service than others. This is because forces apply the</p>   | WHITE  | January 2019  | This action is for the NPCC lead for hate crime and College of Policing.  |

| Recommendations & Areas for Improvement |  | Status    | Due Date  | Comment  |
|---|--|-----------|---|--|
|   | <p>national minimum standard of response to victims of hate crime inconsistently.</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• We recommend that, following the review, any agreed minimum standard of response for forces should be monitored by force governance processes, including external scrutiny.</li> </ul> |           |   | <p>The force complies with current guidance issued by the College of police Hate crime operation guidance 2014.</p> <p>The College of Policing will be replacing their guidance with a Hate Crime APP, but no delivery timelines have been published.</p> <p>The Head of Public Protection maintains a watching brief.</p> |
| 13                                      | <p><u>Recommendation</u></p> <p>In our view, forces don't gather and use intelligence about hate crime consistently enough. This means forces don't have enough information to understand fully how different groups are victimised and make sure that officers make effective decisions about how to respond.</p> <ul style="list-style-type: none"> <li>• We recommend that chief constables make sure officers know it is important to find and record more intelligence about hate crime and use it to inform the police response.</li> </ul>                                | NEW GREEN | <p>No date set by HMICFRS</p> <p>Deadline of April 2019 set</p> | <p>A draft problem profile has been produced – the importance of intelligence submissions is being included within vulnerability related training plans in addition to regular requests for intel in FIB daily briefings</p>   |

# Out-of-court disposal work in youth offending teams

A national joint report by HMICFRS and HMI Probation

Published March 2018

This report makes 11 recommendations, 5 are for the force and are in progress.

| Recommendations & Areas for Improvement |  | Status | Due Date  | Comment   |
|---|--|--------|---|---|
| 4                                       | <b>Recommendation</b><br>Youth offending teams and chief constables should:<br>Make sure that the requirements of youth conditional cautions are meaningful to children, and describe the desired outcomes and how these will be achieved.   | AMBER  | No<br>deadline<br>specified<br>within the<br>report<br><br>March<br>2019<br>deadline<br>set<br><br>Now July<br>2019 | The force has conducted an audit which has established a baseline of the number of youth conditional cautions and shortcoming arising from their issue.<br>Numbers are low: 8 youth cautions and 3 youth conditional cautions in the year 2017/2018.<br><br>There is currently insufficient guidance available to officers as to the force process and individual roles and responsibilities. A meeting took place 25 <sup>th</sup> March 2019 [DCI Crime and A/CI Communities] to start to define these – a new deadline has been set of July 2019 been accepted at the force Performance Management Group.<br><br>The DCI Crime is currently producing a SOP. |
| 5                                       | <b>Recommendation</b><br>Youth offending teams and chief constables should:<br>Make sure that all victims have a fully informed and effective opportunity to have their views heard, and to receive an appropriate restorative intervention.   | AMBER  |   |   |
| 6                                       | <b>Recommendation</b><br>Youth offending teams and chief constables should:<br>Make sure that children understand the implications of receiving an out-of-court disposal before they are asked to accept it.   | AMBER  |   |   |
| 10                                      | <b>Recommendation</b><br>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. | AMBER  |   |   |

| Recommendations & Areas for Improvement |  | Status | Due Date  | Comment  |
|---|--|--------|---|--|
| 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. | AMBER  | No deadline specified within the report<br><br>August 2019 deadline set | The Custody Juvenile Detainees SOP has been reviewed, amended and published [November 2018].<br><br>The Custody – Fingerprints and non-intimate samples within a Custody Suite SOP remains to be reviewed – due August 2019. |

## PEEL: Police Effectiveness 2017 – National

A national report by HMICFRS

Published March 2018

This report was published 22<sup>nd</sup> 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                                       | <b>Recommendation</b><br>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. The infrastructure to support peer reviews should be in place by September 2018 with the first reviews taking place by January 2019. | WHITE  | September 2018<br>And<br>January 2019 | Details of the peer review approach have not been released by the College of Policing at this time. |

# PEEL: Police Legitimacy 2017 – National

A national report by HMICFRS

Published 12<sup>th</sup> December 2017

There are 2 recommendations which apply to the force; 1 is complete and 1 in progress.

| Recommendations & Areas for Improvement |  | Status       | Due Date   | Comment  |
|---|--|--------------|--|--|
| 2                                       | <p><b>Recommendation</b></p> <p>By July 2018, and ongoing following that date, forces should ensure that all officers who use stop and search powers have been provided with, and understand, training on unconscious bias and College of Policing APP on stop and search.</p> | NEW<br>GREEN | <p>Force Set<br/>deadline of<br/>December<br/>2018</p> <p>Now set for<br/>March<br/>2019</p> | <p>The force has mandated training for all Police teams which undertake stop and search as part of their normal deployment, these teams have been identified and trained except for a small number [single figures] who have been allocated a training date.</p> <p>The force will now continue to train all other officers.</p> |

# 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, 2 are complete, 1 is in progress and 1 is closed.

| Recommendations & Areas for Improvement |   | Status  | Due Date  | Comment  |
|---|---|---------|---|--|
| 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 RED | No deadline set by HMICFRS<br><br>A deadline of April 2019 has been set<br><br>New deadline set July 2019 | This is being picked up by the new Head of PPU and a new deadline set as the previous incumbent has gone on maternity leave. Enquiries are being made with the business areas to find out the number of offenders in the City as they may not actually reside in the City. Once this is confirmed the Head of Public Protection will approach criminal justice partners as to what programmes they access for convicted offenders and if these are relevant and appropriate to CoLP. |