

<b>Committee(s):</b> Strategic Planning and Performance Committee	<b>Dated:</b> 22 February 2024
<b>Subject:</b> HMICFRS Update on PEEL Inspection 'Requires Improvements'	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1
<b>Does this proposal require extra revenue and/or capital spending?</b>	N/A
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	N/A
<b>Report of:</b> Commissioner of Police Pol 22-24	<b>For Discussion</b>
<b>Report author:</b> Brett McKenna, Head of Strategy & Planning	

### Summary

This report provides Members with an update on the areas identified in the last PEEL Inspection as 'Requires Improvement' since the last update to the September 2023 Committee.

### **Recommendation**

Members are asked to note the report.

### **Main Report**

#### **Background**

1. This report provides Members with an overview of activity related to HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) areas identified in the PEEL Inspection as requires improvement since the last update presented to the September 2023 meeting of the Strategic Planning and Performance Committee.
2. Through CoLP's Operational Improvement Board thematic reviews of progress in the following areas have been undertaken:
  - Prevention & Neighbourhood Policing
  - Offender Management
  - Serious Organised Crime
  - Investigations
  - Vulnerability
  - Strategic Planning

- Vetting & Counter Corruption
- Crime Data Integrity

## **Current position**

### Preventing crime and anti-social behaviour

***Area for improvement: The force should develop a strategy for providing neighbourhood policing with a governance framework that will improve performance***

3. The Neighbourhood Policing & Engagement Strategy (NHP) has been published and a delivery plan developed. A review of police cluster panels as a means of engagement has also been undertaken.
4. Internal governance has been strengthened through a new performance framework overseen by a new Neighbourhood Policing Delivery Board reporting to a new joint local policing and specialist operations performance meeting.

***Area for improvement: The force should routinely review problem-solving plans and make sure good practice is shared with staff as part of a lessons-learned approach.***

5. The Partnership and Prevention hub is now fully staffed. CoLP has continued to roll out problem solving training to all front line officers, all problem solving plans are uploaded to SharePoint and are reviewed as part of local governance. The continued problem solving approach taken to address begging and anti-social cycling will be reviewed as part of the business planning process, in Q1 of 2024. Initial results are already confirming reductions in ASB reports.

***Area for improvement: The force needs to ensure that neighbourhood policing officers have access to training relevant to their role.***

6. As of December 2023, all Dedicated Ward Officers have received Practitioners in Community Safety & Crime Prevention accreditation and internal professional development training on problem solving. This training programme will now form part of the professional development package of new officers into the department.
7. Phase 1 of the Force Training Needs Analysis has now been completed to map the training requirements of all officers and staff across the organisation.

### Managing offenders and suspects

***Area for improvement: The force should ensure that it has an effective system for monitoring how registered sex offenders (RSOs) are managed.***

8. New internal governance structures have improved management of Registered Sex Offenders (RSOs), providing clear oversight of this offender management, oversight of warrants, with clear reporting lines into the Strategic Vulnerability Board when appropriate. CoLP is compliant with all home visits and risk management plans relating to RSOs as of December 2023.
9. Four detectives are trained in the use of the ViSOR (Violent Sex Offender Register), which is deemed to be the appropriate numbers of officers for the City to hold this

skill owing to the very low volume of RSOs in the City. This has been combined with uplift in staff the Public Protection Unit.

***Area for improvement: The force should make sure that it has appropriately trained staff to undertake the grading and management of child abuse images.***

10. CoLP has met the requirements of this area of improvement, and successfully implemented the Child Abuse Image Database (CAID) IT system to manage child abuse images. The appropriate number of staff have been trained, demand levels are being managed with no reported disruptions to this service. Oversight of this training will be reviewed by internal department governance and tracked through the annual business planning process.

### Serious Organised Crime

11. City of London Police has two local areas for improvement and one regional recommendation. Progress on SOC will also be covered as part of a separate agenda item.

***Area for improvement: Except for cybercrime, the force has recorded low levels of serious and organised crime disruption.***

12. CoLP has delivered significant increases in disruptions against drugs and organised acquisitive crime. There is a separate deep dive on SOC on this agenda which expands on the points below.

***Area for improvement: City of London Police needs to improve its understanding of drug markets and the threat from modern slavery and human trafficking***

13. Modern slavery, drug crime, human trafficking and child sexual exploitation have continued to be reviewed as priorities for the CoLP throughout 2023.

14. Op Andretti<sup>1</sup> has continued to spearhead the drive against acquisitive crime inclusive of ensuring the CoLP develop a rich intelligence review.

15. Op Hamble<sup>2</sup> has developed significant increase in the understanding of drug activity within the City, demonstrating the commitment of the CoLP to disrupting illegal drug activity and developing the understanding of the local intelligence landscape.

***Regional Recommendation: The Metropolitan Police Service (MPS), British Transport Police (BTP) and the City of London Police (CoLP) should create a single sensitive intelligence unit (SIU).***

16. After consultation with the MPS and BTP the regional position on this recommendation is that the current apparatus in the Regional Organised Crime Threat Assessment Unit (ROCTA) is fit for purpose. The MPS has informed HMICFRS of this evaluation. A response from HMICFRS is awaited.

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<sup>1</sup> Op Andretti is the overall police response relating to crime linked to drugs and county lines

<sup>2</sup> Op Hamble-is focused on intercepted parcels which contain illegal drugs with addresses destined for the City of London

## Tackling workforce corruption

### **City of London Police has one area for improvement which covers both vetting and counter corruption:**

- *The CoLP has a clear understanding of the level of vetting required for all posts and that all personnel have been vetted to a high enough level for the posts they hold;*
  - *The CoLP has a clear understanding of the vetting required for all non-police personnel and that all non-police personnel have been vetted to a high enough level for their role*
  - *The vetting unit has sufficient staff to meet the demand it faces;*
  - *The CoLP has a comprehensive process for the workforce to report changes of personal circumstances and when such changes are reported, the vetting unit carries out suitable enquiries*
  - *The CoLP has current policies relating to notifiable associations, business interests and gifts/hospitality and implements them effectively to identify and manage corruption threats.*
  - *When concerning adverse information has been identified during the vetting process, all vetting decisions (refusals, clearances and appeals) are supported with a sufficiently detailed written rationale*
  - *When granting vetting clearance to applicants with concerning adverse information, the CoLP vetting unit creates and implements effective risk mitigation strategies, with clearly defined responsibilities and robust oversight*
  - *The CoLP analyses vetting data to identify, understand and respond to any disproportionality.*
  - *The CoLP carries out proactive intelligence collection and accurately assesses all corruption-related intelligence;*
17. Since the last report completion of the vetting review across all officer and staff posts has been delivered alongside an uplift in recruitment into the Vetting Unit. CoLP now has a clear understanding of the flexibility needed to meet future surge for recruitment campaigns.
18. Reality testing has confirmed the continued activity in relation to failed vetting applicants, and CoLP has integrated a standard review process into all those applicants who fail vetting. Further reality testing has confirmed that CoLP carries out appropriate reviews of appeals against vetting failures.
19. For 2024 a bespoke reality testing audit schedule for the Vetting and Counter Corruption teams will be developed in line with requirements of HMICFRS.
20. CoLP is committed to further enriching the understanding of disproportionality data in the vetting process. Recruitment of an analyst is underway.

## Strategic planning, organisational management and value for money

***Area for improvement: The force should improve its recording of demand, removing single points of potential failure.***

21. The production of the Force Management Statement for 2024 is being developed with learning from 2023. The Force Management Statement 2023 demonstrated a significant improvement of CoLP's understanding of demand data and use of data to inform strategic decision making, which was recognised by HMICFRS as an improvement in its approach to strategic planning.

22. A new data framework is now being used to inform the strategic data planning strategy which will be subject to bi-annual review. Further work is being developed to improve recording and quality of data.

23. Recruitment into the Data Hub as part of the Corporate Services review has commenced and the posts are being recruited to at the time of writing. Once at capacity the Hub is will support the continued development of data quality and management working alongside a new Strategic Insights team.

***Area for improvement: The force should reduce the vacancies in staff and officer positions. These are negatively affecting the service it provides to the public, and the well-being of its staff.***

24. A recruitment plan to reduce all core staff vacancies has been developed which aims to bring establishment up to strength by November 2024 while maintaining officer numbers.

***Area for improvement: The force should ensure its corporate services review improves the service it provides across the force.***

25. The new Corporate Services structure is being implemented and a post-implementation review will be carried out in 2025.

### **Conclusion**

26. CoLP is progressing its 'Requires Improvement' recommendations made by HMICFRS from PEEL 2022. A further update will be provided to the September 2024 Strategic Planning and Performance Committee with a view to closing the majority of these recommendations off by that date.

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