



City of London Police Authority Board

Date: TUESDAY, 6 OCTOBER 2020
Time: 1.45 pm
Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

Members: Deputy James Thomson (Chairman)
Doug Barrow (Deputy Chairman)
Caroline Addy
Munsur Ali
Nick Bensted-Smith
Deputy Keith Bottomley
Tijs Broeke
Alderman Emma Edhem
Alderman Alison Gowman
Alderman Tim Hailes
Dawn Wright
Andrew Lentin (External Member)
Deborah Oliver (External Member)

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

Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:

<https://youtu.be/MOp6JvA9f-k>

This meeting will be a virtual meeting and therefore will not take place in a physical location following regulations made under Section 78 of the Coronavirus Act 2020. A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

John Barradell
Town Clerk and Chief Executive

Future Meeting Dates

9 November 2020, 10.00am – 12.00pm
16 December 2020, 10.00am – 12.00pm
7 January 2021, 10.00am-12.00pm
3 February 2021, 10.00am – 12.00pm
3 March 2021, 10.00am – 12.00pm
1 April 2021, 10.00am – 12.00pm

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**
To consider the public minutes and non-public summary of the meeting held on 3 September 2020.

For Decision
(Pages 1 - 10)
4. **OUTSTANDING REFERENCES**
Joint report of the Town Clerk and Commissioner.

For Information
(Pages 11 - 16)
5. **CHAIRMAN'S PUBLIC UPDATE**
The Chairman to be heard.

For Information
6. **COMMISSIONER'S PUBLIC UPDATE**
The Commissioner & Chief Officers to be heard.

For Information
7. **NATIONAL LEAD FORCE**
The Commissioner & Chief Officers to be heard.

For Information

8. **APPOINTMENT OF EMPLOYER REPRESENTATIVE - CITY OF LONDON POLICE PENSIONS BOARD**
Report of the Town Clerk.
- For Decision**
(Pages 17 - 18)
9. **THE LISVANE REVIEW - SUMMARY OF CITY OF LONDON POLICE-SPECIFIC ISSUES AND RECOMMENDATIONS**
Report of the Town Clerk.
- For Information**
(Pages 19 - 22)
10. **Q1 BUDGET MONITORING 2020/21**
Report of the Commissioner.
- For Information**
(Pages 23 - 48)
11. **CITY OF LONDON POLICE RESERVES (FINANCE) POLICY**
Report of the Commissioner.
- This report has been withdrawn.*
- For Information**
12. **USE OF ALGORITHMS AND ARTIFICIAL INTELLIGENCE WITHIN CITY OF LONDON POLICE**
Report of the Commissioner.
- For Information**
(Pages 49 - 88)
13. **CITY OF LONDON POLICE SPECIALS AND RESERVE - UTILISATION AND DEPLOYMENT**
Report of the Commissioner.
- This report has been withdrawn.*
- For Information**
14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**
15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

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

For Decision

Part 2 - Non-Public Agenda

17. **NON-PUBLIC MINUTES**
To consider the non-public minutes of the meeting held on 3 September 2020.

For Decision
(Pages 89 - 92)

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

For Information
(Pages 93 - 94)

19. **CHAIRMAN'S NON-PUBLIC UPDATE**

For Information

20. **COMMISSIONER'S NON-PUBLIC UPDATE**
The Commissioner & Chief Officers to be heard.

For Information

21. **NATIONAL LEAD FORCE**

For Information

- a) **National Lead Force Plan 2020-22** (Pages 95 - 138)
Report of the Commissioner.

22. **CITY OF LONDON POLICE ETHICAL PARTNERSHIPS**
Report of the Commissioner.

For Information
(Pages 139 - 150)

23. **CITY OF LONDON POLICE TRANSFORM PROGRAMME**
Report of the Commissioner.

For Information
(Pages 151 - 180)

24. **SHARED SERVICES**

Report(s) of the Commissioner and the Chief Executive – TO FOLLOW.

For Information

25. **BRITISH TRANSPORT POLICE AND CITY OF LONDON POLICE STRATEGIC ALLIANCE AND MEMORANDUM OF AGREEMENT FOR PROFESSIONAL STANDARDS AND COUNTER CORRUPTION SERVICES**

Report of the Commissioner.

For Decision
(Pages 181 - 184)

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

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

Part 3 - Confidential Agenda – CIRCULATED SEPERATELY

28. **CONFIDENTIAL MINUTES**

To consider the confidential minutes of the meeting held on 3 September 2020.

For Decision

29. **CONFIDENTIAL ITEM**

For Decision

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CITY OF LONDON POLICE AUTHORITY BOARD **Thursday, 3 September 2020**

Minutes of the meeting of the City of London Police Authority Board held at Microsoft Teams on Thursday, 3 September 2020 at 11.00 am

Present

Members:

Deputy James Thomson (Chairman)
Douglas Barrow (Deputy Chairman)
Caroline Addy
Munsur Ali
Deputy Keith Bottomley
Tijs Broeke
Alderman Emma Edhem
Alderman Alison Gowman
Alderman Timothy Hailes
Dawn Wright
Andrew Lentin (External Member)
Deborah Oliver (External Member)

Observing:

Helen Fentimen

City of London Police Authority:

John Barradell	- Chief Executive
Simon Latham	- Deputy Chief Executive
Alex Orme	- Head of Police Authority Team
Oliver Bolton	- Deputy Head of Police Authority Team
Alistair MacLellan	- Town Clerk's Department
Joe Anstee	- Town Clerk's Department
Leanne Murphy	- Town Clerk's Department
Chandni Tanna	- Town Clerk's Department
Dr Peter Kane	- Treasurer
Alistair Cook	- Head of Police Authority Finance
Ellen Wentworth	- Chamberlain's Department
Bruce Hunt	- Remembrancer's Office
Paul Chadha	- Comptroller and City Solicitor's Department

City of London Police Force:

Ian Dyson	- Commissioner
Alistair Sutherland	- Assistant Commissioner
David Evans	- T/Commander (Operations and Security)
Clinton Blackburn	- T/Commander (Economic Crime)
Cecilie Booth	- Chief Operating and Chief Financial Officer
Hayley Williams	- City of London Police

1. **APOLOGIES**

The Town Clerk noted that Tijs Broeke would join the meeting late.

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

There were no declarations.

3. **MINUTES**

RESOLVED, that the public minutes and non-public summary of the meeting held on 29 July 2020 be approved subject to an amendment being made to the reference to Cyber Griffin.

Matters Arising

Appointment to Committees

The Town Clerk noted that subsequent to the 29 July 2020 meeting, Alderman Emma Edhem had expressed an interest in being appointed to the Economic Crime Committee **(35/2020/P)**.

RESOLVED, that Alderman Emma Edhem be appointed to the Economic Crime Committee for 2020/21.

Special Interest Areas

The Town Clerk noted that Munsur Ali had expressed an interest in deputising for Deborah Oliver in the Neighbourhood Policing portfolio **(35/2020/P)**.

RESOLVED, that Munsur Ali be appointed deputy Special Interest Area lead for Neighbourhood Policing for 2020/21.

4. **OUTSTANDING REFERENCES**

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

30/2019/P – Cyber Griffin Evaluation

- The Deputy Chief Executive noted that since the July 2020 meeting of the Board, the original unsuccessful funding bid had been reviewed and updated in light of work conducted in-house, and the refreshed bid would be submitted to the City's Cyber Security Steering Group that week where, subject to endorsement, local funding would be used to carry out the proposed evaluation. There would be no need to approach the City's Resource Allocation Sub-Committee. An update would be provided at the October 2020 meeting.

37/2019/P – Bishopsgate Exercise Yard

- The Commissioner noted that an original assessment of required works of £100,000 had been reduced to £70,000 by the Capital Buildings Committee. Further work had demonstrated that the original assessment of £100,000 was definitely required. Once approval was secured to

spend the additional £30,000, and provided that approval was provided imminently, it would be possible to deliver the works before Christmas.

- The Lead Member for Safeguarding and Public Protection noted that this reference had been outstanding for some time and had arisen due to a red risk identified by an external inspection. The Member called for assurance that the £30,000 could be provided from the Force's capital programme rather than reverting back to Capital Buildings Committee.
- The Chairman invited the Deputy Chief Executive and Treasurer to resolve any extant governance issues that were delaying the project as soon as possible.
- In response to a question, the Town Clerk and Chief Operating and Chief Financial Officer noted that the exercise yard project was subject to Capital Buildings Committee as it fell within the overall Police Accommodation Programme. The additional £30,000 funding could be met from the programme's decant budget.

41/2019//P - Ethical Economic Partnerships

- The Chairman noted that this report had been scheduled for the agenda that day, but he had agreed that it should instead be deferred until the October 2020 meeting. this deferral would allow more time to provide a more substantive paper that listed all partnerships, summarised their purpose, and what income they generated if relevant to that partnership.
- The Town Clerk agreed to ensure that the report was also submitted to the Board's Professional Standards and Integrity Committee for consideration.

30/2020/P Special Interest Area Scheme

- The Chairman noted that introductory meetings for SIA Members were being convened by the Authority and Force.

31/2020/P – City of London Police Authority Member Briefing - Protective Security

- The Chairman noted that the invitation would be issued to the Court of Common Council that week and requested Board Members to encourage their Court colleagues to attend.

33/2020/P – City of London Police Reserve – Strength and Composition Specials

- The Chairman noted that the report had been deferred to the October 2020 meeting due to staff annual leave.

34/2020/P – Road Ranger Reduction and Active Travel Plan

- The Town Clerk agreed to ensure that the Lead Member for Road Safety was invited to the Performance and Resource Management Committee meeting at which the update on implementation of HMICFRS recommendations was considered.

PRM 2/2020/P – Reserves Policy

- The Chairman briefed Members that a paper would come to the October 2020 Board that would consider Force finances and in-year spend, and provide an understanding of the Force's position on its underspend and how that related to its recruitment and headcount. The paper would also provide proposals on how underspends were managed, and a potential acceleration of the Action Know Fraud loan.

RESOLVED, that the report be received.

5. CHAIRMAN'S PUBLIC UPDATE

The Chairman was heard in public session and the following points were made.

Future Meetings

- The Chairman noted that the Board had, at its 29 July 2020 meeting, decided to adopt an increased frequency of meetings going forward to allow more time to discuss substantive issues. Officers at the City were working towards putting in place arrangements for hybrid meetings where some Members and Officers could be physically present. Members would be contacted in due course to establish their preference to attend meetings in-person or continue to attend via virtual means **(36/2020/P)**.

City of London Policing Plan

- The Chairman noted that he was presenting the City of London Policing Plan at the Court of Common Council on 10 September 2020. The plan was a statutory requirement for the Force's local function but there was also a need to articulate the Force's National Lead Force function too. Members should note that the Plan had been developed prior to the onset of COVID-19, and engagement would take place with Members in developing the refreshed Plan for 2021-2022 shortly. Historically, engagement had taken place with Members of the City of London Police Authority Board, and officers from the Force, whereas the forthcoming process would be available to all Members of the Court of Common Council.
- The Chairman added that the City of London Corporation was also putting thought into the changing face of the City, and how office space would be used going forward in light of increased working from home

patterns. The Force would need to be mindful of this as it went about setting targets and its future Target Operating Model.

Force Finances / Headcount

- In response to a question from a Member regarding the Force underspend due to vacancy rate, the Commissioner replied that the original Force budget had been set based on confirmation of both local and national funding, and since that time recruitment had been done at pace, with two intakes so far this financial year and more intakes planned. The Force was working to identify an up to date headcount in light of those intakes, transfers from outside the Force, and leavers and retirements. The Commissioner was confident in the pace at which recruitment was being conducted but given the original budget had been based on full establishment it was inevitable that there would be an underspend in light of the vacancy rate.
- The Chairman clarified that an analysis of where gaps in the Force existed due to vacancy rate would be dealt with in a report at the October 2020 meeting.

6. COMMISSIONER'S UPDATES

The Commissioner and Chief Officers were heard in public session and the following points were made.

- The Commander (Operations and Security) noted that those Members resident in the City, or attending the City in person, may have seen a small uptick in City attendance by the general public, although numbers were not significant. A further increase was anticipated during week commencing 7 September once pupils had returned to schools.
- The Commander (Operations and Security) continued, noting that crime and anti-social behaviour continued to be at low levels this year compared to last year, with recent increases in shoplifting and pedal cycle theft having plateaued. That said, there was some seasonality to these types of crime and so it remained to be seen whether these crime levels normalised in the coming months. Crime and anti-social behaviour continued to be a key focus for the Force despite low overall attendance in the City by the general public.
- The Commander (Operations and Security) noted that the night-time economy was bouncing back more rapidly than the day-time economy, with significant numbers returning to the City particularly with the recent good weather. This had given rise to some public order issues which had required a police response in co-operation with the City's Licensing Team, particularly on the Broadgate Estate where there had been three weekends of unacceptable activity.
- In respect of COVID-19, staff absence was at 3% which was lower than at this point the previous year. The Force's establishment was sufficient

to meet forecast commitments. The next three days would see planned protests commencing that day with a small Byelorussian protest outside the London Stock Exchange, succeeded by two days of protest by Extinction Rebellion. The Commander (Operations and Security) assured Members that policing plans were in place, including for mutual support between City of London Police and the Metropolitan Police under Op BENBOW.

- The Commander (Operations and Security) concluded by noting that a considerable amount of work was being undertaken to enable sections of the Force to return to the workplace, through making those workplaces COVID-secure. The Commander noted that he had been tasked by the Commissioner to establish new ways of working to enable the Force to meet its responsibilities as a responsible employer in facilitating a safe return to work over the next few months. Planning had commenced for the traditionally busy Christmas period, acknowledging the fact that it was uncertain what impact COVID and new ways of working would have on that time of year.
- In response to a question, the Commander (Operations and Security) noted that at the outset of lockdown the Force had dealt with an increase in burglary of office premises, which had been addressed by an appropriate patrol strategy that was enabled by the fact would-be criminals were not able to hide in plain sight in crowds. The Force had had some successes in arresting suspects on the scene or making off from the scene(s). There had been a reduction in drug related crime due to the closure of licensed premises. The Commander noted that there had been a 15%-19% reduction in crime nationally, but a 54% increase in drug arrests in the Metropolitan Police area which, for the reason outlined above, had not been replicated in the City.

7. NATIONAL LEAD FORCE

The Commissioner and Chief Officers were heard regarding National Lead Force issues and the following points were made.

- The Commissioner introduced T/Commander Blackburn, who was in post following the retirement of Commander Baxter. The Commissioner added that Members would receive a National Lead Force Plan at their October 2020 meeting that set out where the Force sat within the national landscape.
- The T/Commander (Economic Crime) noted the national economic crime picture for 2019/20, with one million contacts to Action Know Fraud which represented an 11% increase on last year. At the beginning of lockdown there had been a 50% decrease in reporting, but pre-lockdown figures had now resumed. 2000 reports of COVID-specific fraud had been reported, of which 1682 had been disseminated to Forces. There had been a 46% increase in online shopping fraud mainly related to fake PPE and testing kits, resulting in 47 arrests and two charged to date.

- In terms of national activity, a spending review bid composed of high, medium and low 'asks' had been submitted with a view to building capacity both within the City and nationally. It was planned to complete 40% of planned recruitment within year one of the planned three-year recruitment timeline.
- Work continued on the fraud reform programme which involved all relevant national agencies. The programme was composed of six strands, namely (1) designing out fraud (2) communications and education (3) fraud and cyber reporting (4) National Cyber Crime Force (5) criminal justice and (6) victim support. The two key strands were the fraud and cyber reporting strand, which the Commissioner was leading on, and the National Cyber Crime Force which has been referenced in the Conservative Party's 2019 manifesto, and aimed to create a whole systems approach to combating fraud. The Force was currently in design stage, with the Force involved in its development. In terms of fraud and cyber reporting, the City was at the stage of procuring a new system and had just undertaken soft market testing.
- The T/Commander (Economic Crime) continued, noting that the Force was investigating 568 offences of which 68 had been deemed complex. National campaigns continued, with Op RADIUM combatting courier fraud resulting on over 100 arrests in the UK. A new Economic Crime Coordination Centre was due to be launched, that would lead on national campaigns going forward.
- The Force had completed five of the fifteen Mackey Review recommendations, with work progressing on the remaining ten.
- Other success stories in the National Lead Force context included an operation against a Romanian organised crime group leading to seizure of £2m and gold bars, and the arrest of a COVID-19 fraudster in the UK within four hours of receiving intelligence from US authorities.
- A Member commented that the Mackey Review had highlighted the need for an end-to-end review of the National Lead Force operating model, including the dissemination of reports and the number of trained investigators across the UK. There was also a risk that an overemphasis on digitalisation would lead to a lack of emphasis on victim care.
- The Chairman added that to tackle fraud effectively it has to be both a government priority, and a priority for PCCs. He had been making this point consistently at the Home Office Fraud Oversight Board and with PCCs. The Commissioner noted that he would, in non-public session, expand more on the Force's work with the Home Office in the spending review and implications for increased capability and capacity.
- The T/Commander (Economic Crime) assured Members that dissemination of reports was embedded within the procurement of the new system, as well as within the fraud reform programme.

- A Member commented that many reviews of complaints were prompted by Action Know Fraud, and the use of algorithms to determine which reports should be disseminated. Whilst the use of algorithms and AI saved time and money, there was a question how far this was appropriate from a victim care perspective. The Member concluded by noting a recent RUSI report into the use of algorithms in policing and the recommendation that a framework be adopted. The Chairman concurred, noting there were issues around GDPR and potential bias within algorithms.
- The T/Commander (Economic Crime) was heard in reply, noting that algorithms were a crucial tool given the volume of reporting and their ability to identify viable cases.
- The Commissioner noted that he was happy to come back to the Board with a comprehensive position from the Force. The use of AI was at the forefront of a lot of thinking in the policing arena and the Force was mindful of its advantages and potential drawbacks. The Commissioner assured Members that decision making remained, ultimately, by human intervention and supported by AI.
- The Chairman welcomed the offer of a report and requested that it include where else algorithms were used within the Force, alongside Action Know Fraud **(37/2020/P)**.

8. **UPDATE ON THE INDEPENDENT ADVISORY AND SCRUTINY GROUP**

Members considered an update report of the Commissioner regarding the Independent Advisory and Scrutiny Group (IASG) and the following points were made.

- The Chairman welcomed the report and noted that the reinvigorated IASG was the result of HMICFRS comments that the previous regime of a Community Scrutiny Group and an Independent Advisory Group was not an effective arrangement that was having a negative impact on Force legitimacy.
- The Assistant Commissioner introduced the report, noting the IASG was made up of 16 Members from a diverse range of backgrounds and ages. 7 Members were BAME and 8 Members were female. There had been good engagement between the IASG and Force GOLD groups on COVID-19 and equality and inclusion. The IASG also offered a lot of potential for improved oversight and perspective in other Force functions such as sensitive investigations, and improved oversight of the use of body work video.
- In response to a question, the Assistant Commissioner confirmed IASG meetings were well attended, and the terms of reference and minutes of the group could be provided outside of the meeting.

- The Chairman noted that he would welcome the opportunity for himself, the Deputy Chairman and Special Interest Area Lead Members to attend meetings of the IASG. Similarly, IASG Members were welcome to attend public sessions of the City of London Police Authority Board **(39/2020/P)**. The Chairman noted he would welcome future reporting to the Board on outcomes from the work of the IASG, so that they could be tracked. Lastly, the Chairman commented that the IASG would be a good forum to test proposed changes within the Force, such as its Target Operating Model.
- The Chairman concluded the item by suggesting that dip sampling of body worn video would be a good topic for review by the Professional Standards and Integrity Committee **(40/2020/P)**.

RESOLVED, that the report be received.

9. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD

There were no questions.

10. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There was no other business.

11. EXCLUSION OF THE PUBLIC

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

12. NON-PUBLIC MINUTES

RESOLVED, that the non-public minutes of the meeting held on 29 July 2020 be approved as a correct record.

13. NON-PUBLIC OUTSTANDING REFERENCES

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

14. CHAIRMAN'S NON-PUBLIC UPDATE

The Chairman noted he had no non-public update to provide to the Board.

15. COMMISSIONER'S UPDATES

The Commissioner and Chief Officers provided non-public updates to the Board.

16. NATIONAL LEAD FORCE

The Commissioner was heard regarding the National Lead Force.

17. CITY OF LONDON POLICE TRANSFORM PROGRAMME

The Commissioner and Chief Officers were heard regarding the City of London Police Transform Programme.

18. **CITY OF LONDON POLICE ETHICAL PARTNERSHIPS - TO FOLLOW**
The Town Clerk noted that this report had been deferred to a future meeting.
19. **POLICING THE CITY BRIDGES - FUNDING - UPDATED**
Members considered an updated report of the Commissioner regarding Policing the City Bridges – Funding.
20. **SAFER CITY PARTNERSHIP UPDATE**
The Deputy Chairman was heard regarding the Safer City Partnership.
21. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**
There was one non-public question.
22. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE BOARD AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There was no other business.
- At this point of the meeting, two hours having elapsed, Members agreed to extend the meeting until all items of business had been considered, in line with Standing Order 40 of the Court of Common Council.*
23. **CONFIDENTIAL MINUTES**
RESOLVED, that the confidential minutes of the meeting held on 29 July 2020 be approved.
24. **CONFIDENTIAL ITEM(S)**
The Chairman was heard in confidential session.

The meeting ended at 1.29 pm

Chairman

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

15/2018/P	Item 4 Outstanding References	Barbican CCTV will form part of Secure City Programme when CCTV is reviewed in the round.	Commissioner of Police	DUE SIX MONTHS POST-CROSSRAIL OPENING
30/2019/P	October 2019 Item 8 Quarterly Community Engagement Update	Alternative funding option(s) to be identified for Cyber Griffin Review / minute of 29 July 2020 meeting to be corrected.	Chief Exec/ Commissioner	COMPLETED
37/2019/P	November 2019 Item 9 – Annual Update on Custody of Vulnerable Persons	Police Authority Board to be updated on progress on options for provision of exercise yard at Bishopsgate Police Station.	Commissioner of Police	IN PROGRESS Force committed to providing report by end of September 2020.

41/2019/P	November 2019 Item 14 – AOB – Ethical Economic Partnerships Policy	The Force should consult at the earliest opportunity with the Chairman and Deputy Chairman of the Police Authority Board, and the Chief Executive of the Police Authority, about the legal form, financial value and reputational risk of any potential external economic partnership prior to this being formalised by the Force, including where appropriate taking any decision to the Police Authority Board; The Force should publish a register of organisations that the Force is in partnership with, including high level details; and the Force should provide an annual report to the Police Authority Board on its external partnerships. Ethical Partnership reporting to be submitted to PSI Committee and Police Authority Board.	Commissioner of Police	COMPLETED Report on October 2020 Board agenda.
25/2020/P	22 June 2020 HR Monitoring Report	Future iterations to include (a) attrition rate of officers/staff by department and rank/grade (2) table breakdown of tribunals opened, in-flight, and closed during the year.	Commissioner of Police	IN PROGRESS The next 6 monthly HR Monitoring report is due to the November 2020 P&RM Committee

29/2020/P	29 July 2020 City of London Police Authority Board and its Committees 2020/21	Job descriptions and person specifications for Board and Committee Chairmen and Members to be refreshed.	Chief Executive	IN PROGRESS Under review following publication of Lisvane Review
30/2020/P	29 July 2020 Special Interest Area Scheme 2020/21	Note on expectations regarding Special Interest Area Scheme operation to be provided to the Board.	Chief Executive	IN PROGRESS Under review following publication of Lisvane Review
33/2020/P	29 July 2020 City of London Police Reserve – Strength and Composition	Further report on deployment and utilisation to be provided to September 2020 meeting.	Commissioner	IN PROGRESS Due at the November 2020 Board.
34/2020/P	29 July 2020 Road Danger Reduction and Active Travel Plan	Action Plan due in Autumn 2020 to resolve issue of disjoint in underlying data sets and provide Force's response to HMICFRS report <i>Roads Policing: Not optional</i> . Report to also provide breakdown of repeat locations (as per 31/2019/P).	Director of the Built Environment / Commissioner	IN PROGRESS Members to note an update on the HMICFRS inspection recommendations will be submitted to the P&RM Committee – Alderman Gowman to be invited to observe.
35/2020/P	3 September 2020 Minutes Matters Arising	Alderman Emma Edhem to be appointed to Economic Crime Committee / Munsur Ali to be appointed Deputy SIA Lead for Neighbourhood Policing	Town Clerk	COMPLETED

36/2020/P	3 September 2020 Chairman's Public Update	PAB Members to be canvassed to gauge appetite for hybrid meetings	Town Clerk	NO LONGER APPLICABLE As per Town Clerk's update at Policy Committee (24 September 2020) in line with national guidance, hybrid meetings will not be convened.
37/2020/P	3 September 2020 National Lead Force	Report to be prepared for Board regarding use of algorithms by the Force, particularly with regards to Action Know Fraud.	Commissioner	COMPLETED Report on October 2020 Board agenda.
38/2020/P	3 September 2020 IASG Update	IASG terms of reference, appointment, membership and meeting dates to be circulated to Board.	Assistant Commissioner	IN PROGRESS Dates are set by IASG not the Force, with the next meeting in December. Contact details have been passed to PA Team; membership list has been passed to PA Team for circulation to Members. TORs still outstanding.
39/2020/P	3 September 2020 IASG Update	Chairman/Deputy Chairman/SIAs to attend IASG meeting(s) / IASG Members to observe COLPAB meetings	Town Clerk	IN PROGRESS To be completed once December 2020 meeting date is confirmed.

40/2020/P	3 September 2020 IASG Update	IASG reference to Body Worn Video to be referred to Professional Standards and Integrity Committee for consideration	Police Authority Team	COMPLETED Added to PSI Committee workplan
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Chairman requested the below be added to PAB ORs

P&RM Committee 2/2020/P	P&RM Committee 7 February 2020 Item 5 – Budget Monitoring Q3	Force Reserves Policy to be developed.	Commissioner of Police/ Treasurer	IN PROGRESS This was due to October PAB but the Treasurer, having reviewed the report, has written to the Chairman to say that the reserves policy should be considered alongside the MTFP update and way forward on Lisvane recommendations in Nov / Dec.
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Committee(s): City of London Police Authority Board	Date(s): 6 October 2020
Subject: Appointment of Employer Representative – City of London Police Pensions Board	Public
Report of: Town Clerk	For Decision
Report author: Alistair MacLellan	

Main Report

1. The City of London Police Pensions Board is responsible for assisting the Scheme Manager (City of London Police Authority Board) in securing compliance with scheme regulations and other relevant legislation; securing compliance with requirements in relation to the scheme imposed by the Pensions Regulator; and the performance of the Scheme Manager's functions under the Police Pensions Regulations 2015.
2. The Chair and Deputy Chair of the Pensions Board are appointed by the City of London Police Authority Board. The Police Authority Board appointed at its July 2020 meeting John Todd (Scheme Representative) Chair for 2020/21 and Alex Barr CC (Employer Representative¹) Deputy Chair respectively for 2020/21.
3. The Chair of the Pensions Board may then appoint at least four and no more than twelve voting Members to the Pensions Board with the approval of the City of London Police Authority Board, preserving an even balance between Scheme Representatives and Employer Representatives.
4. A vacancy for an Employer Representative of the Pensions Board arose in July 2020, when Alderman Ian Luder stepped down from the Board. The vacancy has been advertised to the Court of Common Council, and the Chair of the Pensions Board, in consultation with the Deputy Chair of that Board, wishes to recommend the appointment of Henry Colthurst CC to the Police Authority Board for approval. Mr Colthurst's supporting statement outlining his experience is provided as an appendix.

Recommendation(s)

- Members are asked to consider the Chair of the City of London Police Pensions Board's recommendation that Henry Colthurst CC be appointed an Employer Representative on that Board.

¹ An Employer representative is a person appointed to the Board for the purpose of representing employer for the scheme. A Scheme Member representative is a person appointed to the Board for the purpose of representing members of the scheme.

Appendices

- Appendix - Henry Colthurst Supporting Statement for Appointment to City of London Police Pensions Board

Background Papers

- [City of London Police Authority Board and its Committees – Report of the Town Clerk \(July 2020\)](#) (appendix sets out terms of reference of City of London Police Pensions Board).

Alistair MacLellan

Town Clerk's Department

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Appendix

Henry Colthurst Supporting Statement for Appointment to City of London Police Pensions Board

I am not an investment professional but have worked in the London insurance market in executive and non-executive capacities since leaving Cambridge in 1980 having graduated in Law. Since 1996 I have sat on regulated insurance boards whose responsibilities have included setting of strategy and monitoring performance of insurance funds required to optimise performance whilst matching assets to liabilities both in terms of duration and currency. I remain a member of the City of London's Investment Committee to which I was elected in 2013 when I first became a Common Councillor. I currently serve as Deputy Chairman of its Financial Investment Board which sets strategy for investment of the Corporation's material financial holdings held for pension, statutory, charitable and "own" purposes and am in my last year of a 3 year term as Chairman of its relatively fledgling Social Investment Board. I have been an Employer Representative on the Hackney Pensions Committee since 2019. I am also a member of the Finance Committee of the Grocers' Livery Company responsible for its financial investments and a trustee of two small charities each with its own endowment fund.

Committee(s): City of London Police Authority Board	Date(s): 6 October 2020
Subject: The Lisvane Review – Summary of City of London Police-specific Issues and Recommendations	Public
Report of: Town Clerk	For Information
Report author: Alistair MacLellan	

Main Report

1. A report of a review of corporate governance of the City of London Corporation by The Lord Lisvane KCB DL was published on 15 September 2020. The report will be scrutinised by the Resource Allocation Sub-Committee in the coming months, with recommendations arising considered by the Policy and Resources Committee and final decision(s) being made by the Court of Common Council. Chairs of affected Committees and Members of the Court will have the opportunity input into final recommendations put to Court, with the scheduled 12 November 2020 informal Court meeting being utilised as a forum to debate and review the report. Depending on the length of time that Resource Allocation Sub-Committee feels in necessary to reach its conclusions, recommendations could be put to Policy Committee in November or December 2020 and final recommendations put to the Court of Common Council in January 2021.
2. A high-level summary of reflections and recommendations relevant to the City of London Police Force and City of London Police Authority Board are set out as an appendix, and Members are invited to comment on these at your October 2020 meeting.
3. Members will note that the City of London Police Authority Team continue to review the wider governance processes underpinning the Authority. This includes developing role profiles and descriptions for Chair, Deputy Chair and Authority Members, as requested by Members at your July 2020 meeting; the enhancement of the Special Interest Area (SIA) Scheme; and the forthcoming bifurcation of the Performance and Resource Management Committee in April 2021, into separate Committees to focus respectively on Policing Plan and Performance, and Finance and Risk.
4. Other governance proposals, including a City of London Police Authority Financial Framework, are in development and will be presented to Members in due course.

Recommendation(s)

Members are asked to note this report and provide comments on the headline summary of reflections/recommendations posed by The Lord Lisvane KCB DL.

Appendices

- Appendix – Summary of City of London Police-specific reflections and recommendations arising from a report of a review of corporate governance of the City of London Corporation by The Lord Lisvane KCB DL.

Background Papers

- [A report of a review of corporate governance of the City of London Corporation by The Lord Lisvane KCB DL](#) (appended to report of Town Clerk to the Resource Allocation Sub (Policy and Resources) Committee)

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Serial	Section	Page / Paragraph	Reflection	Recommendation
1	4. Corporation's Strengths and Weaknesses / Strengths / Richness of Texture	p.22 paragraphs 88-90	The Force is one element that makes up the City's texture – it offers extraordinary opportunity for cross-fertilisation, enhancing experience of all who come into contact with City, and demonstrating that whole is more than sum of parts: nevertheless the variety of activities prompts question of whether Corporation should continue to own/run everything it does currently.	
2	7. Committees / Restructuring / Multiple Membership	p.59 paragraph 275		Membership of the Police Authority Board should not count towards the recommended limit of a Member serving on no more than two Committees.
3	7. Committees / Restructuring / Chair Terms	p.60 paragraph 277		All Chair terms should be four years.
4	7. Committees / The New Committee Structure / The Policy and Resources Committee	p.63 paragraph 290		Chair of Police Authority Board should be ex-officio of Policy Committee
5	7. Committees / The New Committee Structure / Crime and Disorder Scrutiny Committee	p.69 paragraph 323		Appropriate utilisation of statutory Crime and Disorder Scrutiny Committee to be re-examined
6	9. Devolution and Demerger / Common Problems / Governance	p. 94 paragraphs 454-458	Appointment of Members is by the Court and is opaque – there is no certainty or probability that Members appointed to PAB will have the necessary skills and experience that makes for an effective Board.	
7	9. Devolution and Demerger / The City of London Police	p.104 paragraphs 495-498	Force is well regarded, and high visibility is welcomed by business and residents. Governance however is anomalous when compared with national arrangements.	
8	9. Devolution and Demerger / The Police Authority Board	pp. 105-106 paragraphs 499-506	Renamed to PAB in 2019 to better reflect Members' statutory responsibilities but remains a Corporation Committee. Board is of reasonable size but appointment by election by the Court gives no sure means of securing Members will relevant skills and experience. Adoption of term limits in July 2020 is welcomed but falls short of ideal of maximum total term of 8 years. SIA scheme lacked engagement – 7 Members for 11 areas, with some Members not involved at all. There is a lack of clarity on split between strategic issues, and operational matters that are responsibility of Commissioner and his staff.	
9	9. Devolution and Demerger / Governance Recommendations	p.106 paragraph 509		Direct appointment to PAB by Court of Common Council should continue, with two changes: (a) the number of Common Councillors should not be a majority on the Board (i.e. no more than six) and (b) they should be put forward for election by the Governance and Nominations Committee, taking full account of their skills and experience, and overall skills mix required.

10	9. Devolution and Demerger / Governance Recommendations	p. 106 paragraph 510		External members of PAB should be appointed following an open advertisement and selection process.
11	9. Devolution and Demerger / Governance Recommendations	p.107 paragraph 511		(a) Board Members should serve a term of four years, renewable once, with no re-appointment during the four years then ensuing (b) A Chair should leave the Board at the end of their term of office.
12	9. Devolution and Demerger / Governance Recommendations	p. 107 paragraph 512		Chair's involvement in appraisal of Commissioner should be consistent with PCC/national policing generally.
13	9. Devolution and Demerger / Control of COLP Staff	p. 108 paragraph 520		A scheme should be devised to allow Commissioner to recruit and deploy staff according to the requirements of the Force; even though those staff would be employees of the Corporation. It is essential for Commissioner to be able to recruit on terms which meet the operational requirements of the Force, rather than being bound by employment policies of wider application (e.g. rest of Corporation).
14	9. Devolution and Demerger / Management Processes	p. 110 paragraph 527	There is a split between uniformed staff employed by Commissioner and civilian staff employed by Corporation. The Commissioner does not have flexibility to recruit in specialised and competitive market nor freedom to deploy staff fully to meet operational requirements	
15	9. Devolution and Demerger / Management Processes	p. 110 paragraph 529	PAB has its own PRM Committee but its finances and financial processes are also scrutinised by Finance Committee, Procurement Sub-Committee and Audit and Risk Committee.	
16	9. Devolution and Demerger / Management Processes	p.110 paragraph 533	Centralised procurement contracts may not meet Force's needs, as well as being more expensive.	

Committee: Police Authority Board	Date: 6 th October 2020
Subject: Q1 Budget Monitoring 2020/21	Public
Report of: Commissioner of Police Pol 67-20	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 £84.9m. This includes the 67 locally agreed growth posts and the 44 National Uplift Year 1 posts. This report outlines the financial position for the first quarter of the 2020/21 financial year. Current projections indicate an underspend of £4.0m by the end of the year, primarily due to the large number of vacancies. An ambitious recruitment programme is in progress, aiming to fill all vacant posts by the end of the financial year. It is therefore anticipated that the underspend position will change in line with new recruitment.

The Police Authority Board decision taken under 'Urgency' on 12th June 2020 was that costs relating to Action Fraud in meeting contractual obligations (procurement, licence fees and exit/transition) in the region of £3.8m would be funded from Police budget underspends. Most, but not all, of these costs are expected to fall within the 2020/21 financial year, and some purchase orders have been raised since the end of the quarter covered within this report. There is an expectation that a separate Home Office grant will meet part of the service improvement costs, however, there is no certainty at this stage that this will be the case.

Any residual underspends at the end of the financial year may be allocated to repayment of the Action Fraud loan to the Corporation of London.

A challenging savings plan is in place. £5.7m is fully built into the budget, with £1.6m in pay and £4.1m in non-pay.

The budget and the savings plans are closely monitored throughout the year with fortnightly meetings between Force and Police Authority finance staff, and monthly meetings with the Commissioner, Force Chief Operating and Chief Finance Officer (COFO) and Police Authority staff. The Savings Tracker is further subject to monthly monitoring meetings and updated Action Plan.

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 £84.9m. This includes the 67 locally agreed growth posts and the 44 National Uplift posts.

1.2 The budget is funded as follows:

Table 1

Funding Type	Amount (£'000)	%
HO Core Grant	61,130	72.0%
Business Rate Premium	13,800	16.3%
Precept Grant	3,450	4.1%
Legacy Council Tax Grant	80	0.1%
Contact Centre Funding	680	0.8%
HO Pension Grant	840	1.0%
67 Growth	5,400	6.4%
Capital priorities	(500)	-0.6%
Total Funding	84,880	100%

1.3 The latest forecast position is summarised below

Table 2

	20/21 Budget £m	Budget YTD £m	Actual (Q1 YTD) £m	Variance YTD £m	Year end Forecast £m	Proj Variance £m
Pay						
Officers – net	61.1	15.3	12.9	(2.4)	59.0	(2.1)
Staff – net	26.0	6.5	5.8	(0.7)	24.7	(1.3)
Overtime	2.2	0.5	0.3	(0.2)	2.0	(0.2)
Agency	1.6	0.4	0.2	(0.2)	1.2	(0.3)
Indirect employee costs	2.3	0.6	0.5	(0.1)	2.3	0.0
Pensions Contrib.	23.0	5.8	0.0	(5.8)	23.0	0.0
Total Pay	116.1	29.0	19.7	(9.4)	112.2	(3.9)
Non-Pay	37.4	9.4	4.2	(5.1)	37.1	(0.3)
Total Expenditure	153.5	38.4	23.9	(14.5)	149.3	(4.2)
Income						

Specific Grant	(51.5)	(12.9)	19.4	32.3	(52.3)	(0.8)
Partnership	(13.0)	(3.2)	(0.6)	2.6	(12.4)	0.6
Fees & Charges	(4.1)	(1.0)	(0.3)	0.7	(3.8)	0.3
Total Income	(68.6)	(17.2)	18.5	35.7	(68.5)	0.2
Funding	(84.9)	(21.2)	(21.2)	0.0	(84.9)	0.0
Underlying Deficit	0.0	0.0	21.1	21.1	(4.0)	(4.0)

1.4 Table 2 indicates a projected underspend of £4.0m, predominately within pay. At the end of June 2020, the Force has 161 vacancies, both officers and staff.

1.5 Non-Pay

Non-Pay is currently forecasted to budget at the end of Q1. Non-Pay comprises 24% of the gross expenditure budget, and it covers:

- Premises - £2.4m
- Supplies and Services - £17.5m
- Transport - £1.9m
- Third Party Payments & Recharges - £15.6m

1.6 In addition;

- Overtime and Agency is forecasted near budget. The use of agency staff is lower than previous year due to a fully funded pay budget, in previous years we have been holding a high vacancy factor to meet required in-year savings.
- COVID-19 has added pressure to the overall budget, however, the Home Office has allowed police forces to claim 50% of the allocated ring-fenced Uplift Grant for this purpose. The CoLP grant is £1.2m, and 25% of this grant was received in Q1.
- It is anticipated that most of the projected underspend will be utilised for Action Fraud as set out above, and any residual underspends will be used towards repayment of the Action Fraud loan from the Corporation. No expenditure has been incurred to date so it is not included in the Q1 forecast.
- It should be noted that there are some significant areas of risk attached to the forecast; e.g. due to travel restrictions, no international training can currently take place and there is likely to be a shortfall in income from the Economic Crime Academy. The position will be closely monitored during the financial year, and additional savings will have to be found if the budgeted income does not materialise.
- Some grants are also at risk, e.g. the TfL grant due to the financial position for TfL while people are avoiding public transport. The position will be reviewed every quarter, in line with announcements made by TfL. So far

we have received confirmation from TFL that the Q1, and for the purpose of this report it is assumed that the following quarter's will be also be received in full. However, this may not materialise.

- 1.7 The YTD position for income includes provision for income that was accrued in 2019/20 for National Lead Force, National Fraud Intelligence Bureau and the National Cyber Security Programme, which has all been received after the end of Q1.

2 Savings Target

- 2.1 Savings mitigations of £5.7m are fully factored into the 2020/21 budget, comprising £1.6m pay and £4.1m non-pay. A savings tracker is in place, which is closely monitored through internal governance, fortnightly monitoring meetings with the Police Authority, and reported to Police Authority Board quarterly. Pay savings will be found through workforce and vacancy management in core funded posts.
- 2.2 Current projections indicate we are on course to deliver the required mitigations, however there are some key risks shown below in Table 3 below:

Table 3

Savings Tracker	Target (£000)	YTD Actual (£000)	Forecast (£000)	Variance (£000)	Risk
Transform pay savings - holding branch	860	860	860	0	G
Average salary reduction through recruitment policy	400	533	533	133	G
Overtime	350	88	350	0	G
Total pay	1,610	1,481	1,743	133	
Savings through National Policing Programmes - NEP	1,300	0	1,300	0	R
IT Transformation	20	0	40	20	A
Digitisation of external services	100	0	100	0	A
Support Services review	350	0	350	0	A
Asset Recovery	100	0	100	0	A
Commercial activity and income generation	950	0	1,253	303	A
Estate savings	1,300	0	581	(719)	R
Total non-pay	4,120	0	3,724	(396)	
Total	5,730	1,481	5,467	(263)	

- 2.3 The main risk in the savings tracker related to NEP, where there is a delay nationally in rolling out the programme. To mitigate this, a new holding branch to a value in the region of £1m will be established, containing vacant posts that may be deleted in line with the national programme roll out. The remaining £300,000 will be found from IT systems savings, e.g. a review of current systems and devices. An updated Savings Tracker is shown in Appendix 2.
- 2.4 Due to international travel restrictions it has not been possible to deliver overseas training in accordance with the Corporate Plan. Some of the

commercial projects have also been delayed due to COVID19. There is a build up of demand for international training and some training has been scheduled for January – March 2021 generating income in the region of £140,000. However, at this stage it is uncertain whether this can go ahead or not, and the position will be closely monitored throughout the year.

- 2.5 We have successfully applied the full cost recovery model for some of our funded units (where contracts have allowed negotiations), which has partly off-set the shortfall.
- 2.6 Overall delay in the Accommodation Programme means there is a delay in the closure of Wood Street. The Force is considering alternative accommodation related savings to off-set the shortfall, as shown in Appendix 2.

3 Directorate Revenue Position

- 3.1 As at the end of Quarter One, current projections indicate an underspend of £4.0m; Table 4 below sets out the Directorate position. This includes £5.7m budget mitigations shown above.

Table 4

Directorates	20/21 Budget £'000	Budget YTD £'000	Actual (Q1 YTD) £'000	Variance YTD £'000	Year end Forecast £'000	Proj Variance £'000
BSD	29,797	7,449	15,611	8,162	27,654	(2,143)
Crime	11,750	2,938	3,380	442	10,617	(1,133)
ECD	8,681	2,170	27,644	25,474	8,458	(223)
I&I	14,347	3,587	3,235	(352)	14,347	0
UPD	20,309	5,077	4,384	(693)	19,804	(505)
Grand Total	84,884	21,221	54,254	33,033	80,881	(4,003)

- 3.2 Business Support Directorate – **underspend of £2.1m**

The BSD directorate budget holds the unallocated overheads, unallocated national uplift and the unallocated overtime the agency budget for the whole Force.

The Directorate is holding vacant posts of 4.92 FTE.

3.3. Crime Directorate – **underspend of £1.1m**

The majority of underspend in Crime is due to vacancies. It is anticipated this underspend will reduce in Q2 due to the large recruitment drive in progress. There is a projected non pay overspend in Forensics outsourced work. The Directorate is holding vacant posts of 20 FTE.

3.4. Economic Directorate – **underspend of £0.2m**

The projected underspend relates to £1.113m pay related expenditure, offset by £0.891m reduction in income. Income from external funders will be matched to actual expenditure during the financial year. The Directorate is holding vacant posts of 53 FTE.

3.5. Information and Intelligence Directorate - **breakeven**

A balanced budget is projected. There is an additional emerging pressure due to increased use of digital investigation linked to remote working in the Central Authorities Bureau (CAB) team. The Directorate is holding vacant posts of 33.7 FTE.

3.6. Uniformed Policing Directorate - **underspend of £0.5m**

The underspend in UPD is mainly due to vacancies. There are significant vacancies within the TFG team due to challenges in recruiting and retaining highly specialist firearms officers. There is also potential loss of TFL Grant income, at this stage it is estimated a loss of one quarter worth of income (circa £400k). This may not materialise and we continue to monitor the position. The Directorate is holding vacant posts of 49.6 FTE.

4 Workforce

- 4.1 The pay budget constitutes 76% of the expenditure budget. The current establishment, including 67 locally agreed growth posts and 44 National Uplift, is 1,389 FTE, comprising 887 Officers and 502 staff. The actual workforce paid in June 2020 was 1,228 FTE comprising 778 Officers and 450 Staff.
- 4.2 Table 5 below sets out the actual position by month for Quarter one, and a forward projection by month for the rest of the financial year. It should be noted that this is only a forecast; it is particularly difficult to predict exactly when posts will be filled due to the timing and success of recruitment campaigns, probationer intake, and the vetting process. The position is closely monitored via the Force Strategic Workforce Planning Board, which meets monthly, and the position will be updated over time and covered in the Q2 and Q3 reports.

Table 5 – Actual workforce numbers for Q1 and forward projections**FTE**

	Month	Officers (FTE)	Staff (FTE)	Total (FTE)
Actual	Apr	768	447	1,214
	May	768	448	1,216
	Jun	778	450	1,228
Forecast	Jul	803	456	1,259
	Aug	826	481	1,307
	Sep	851	483	1,334
	Oct	870	486	1,356
	Nov	884	488	1,372
	Dec	885	492	1,377
	Jan	883	493	1,376
	Feb	887	500	1,387
	Mar	887	501	1,388

Head count

Headcount	Est	Apr	May	Jun
Officers	887	777	781	790
Staff	502	462	464	465
Total	1389	1,239.00	1,245.00	1,255.00

4.3 National Uplift

The Prime Minister pledged to recruit 20,000 extra police officers in England and Wales over three years, with a recruitment drive that started in September 2019. We 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. Funding for the 44 was provided in the 2020/21 police settlement in January.

To date, 24 officers have been recruited to the 44 new posts.

4.4 67 Growth

Recruitment towards the 67 locally agreed growth is under way. To date, at the end of August 2020, 51 posts have been filled, 11 are currently in vetting and a further 5 will be filled in the near future.

Post Title	Establishment	In Place	Vacant
ARV Constable	13	13	0
Communications Officer - Servator	1	1	0

Constable	4	4	0
Counter Corruption Officer	2	2	0
Detective Constable ART	8	8	0
Disruptive Effects Officer	24	11	13
Disruptive Effects Officer - Inspector	1	1	0
Disruptive Effects Officer - Sergeant	2	1	1
Firearms Chief Inspector	1	1	0
Firearms Inspector	1	1	0
Operational Planning Officer	2	2	0
Project Manager	4	4	0
Project Manager (Business Analyst)	2	2	0
Servator Prisoner Handling PC	1	0	1
Servator Tasking & Coordination PC	1	0	1
Grand Total	67	51	16

Recruitment status of vacant post	FTE
In vetting	11
To be appointed	5
Grand Total	16

- 4.5 It is difficult to monitor expenditure against the 67 local growth posts separately from the rest of the budget, however, costs to date are in the region of £2.3m which includes direct salary costs, 25% oncosts, firearms equipment and direct recruitment costs such as advertising and additional HR support. It is anticipated that the 11 at vetting stage will be in post by 31st October and the remaining 5 will be in post by 1st January. The projected underspend against the £5.4m additional funding for the 67 posts is £0.56m, which may be utilised towards repayment of the Action Fraud Loan.

5 Income

- 5.1 Table 6 below sets out grant funding totalling £64.8m. Current projections indicate a high level of confidence in receipt from all funders
- 5.2 The majority of grant income is received or accrued for at the end of year. Steps are taken to claim grant income early in the year if possible.

- 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. Negative variances indicate a lower level of grant income than forecast.

Table 6

Name of Grant	Funding Provider	2020/21 Budget £'000	Actual YTD £'000	Projected Outturn £'000	Projected Variance £'000	Risk Rating
Police Pensions Grant	Home Office	(23,000)	(938)	(23,000)	0	G
Counter Terrorism Policy Grant	Home Office	(6,685)	(1,969)	(6,760)	(75)	G
Action Fraud Managed Service	Home Office	(6,200)	5,513	(6,200)	0	G
National Cyber Security Programme	Home Office	(6,110)	6,166	(6,000)	110	G
Action Fraud /National Fraud Intelligence Bureau	Home Office	(4,300)	4,213	(4,300)	0	G
Insurance Fraud Enforcement Team	Association of British Insurers	(4,123)	28	(3,941)	182	G
Economic Crime Capability Development	Home Office	(2,850)	3,263	(2,850)	0	G
Dedicated Cheque & Plastic Card Unit (DCPCU)	UK Payments Administration Ltd	(2,570)	(197)	(2,494)	76	G
National Lead Force	Home Office	(2,500)	2,250	(2,500)	0	G
International Property Crime Investigation Unit (IPICU)	Intellectual Property Office	(2,053)	1	(1,950)	103	G
Police Transport Grant	Transport for London	(1,884)	(64)	(1,413)	471	A
Cyber Griffin	Corporation	(700)	0	(700)	0	G
Lloyds Sponsorship	Lloyds Bank	(408)	(453)	(309)	99	G
Other - International Training and Development Team	Home Office	(400)	(18)	(400)	0	A
Late Night Levy	Corporation	(300)	0	(300)	0	G
London Safety Camera Partnership	Transport for London	(269)	0	(269)	0	G
Economic Crime Victim Care Unit	Mayor's Office for Policing & Crime	(210)	208	(210)	0	G
Tower Bridge	Corporation	(92)	0	(92)	0	G
Regional Organised Crime Unit Coordinator	Home Office	(90)	92	(90)	0	G
Other - Misc		(5)	(36)	(327)	(322)	G
Common Police Services Contributions	College of Policing and HMICFRS	0	(22)	(45)	(45)	G

National to Local Fraud & Cyber Data Sharing	Home Office	0	585	0	0	G
PTF & NCSP Funding Grant	Miscellaneous income	0	243	0	0	G
20/21 Ring-fenced Police Uplift Programme (PUP)	Home Office	0	0	(723)	(723)	G
		(64,749)	18,864	(64,874)	(125)	

5.4 As illustrated, the key risk areas are around the TfL grant and international training.

5.5 As outlined in the Medium Term Financial Plan, work continues to ensure there is a full cost recovery approach to all funded units. The full cost recovery model is applied as and when existing contracts allow negotiations.

6 Capital Programme

6.1 Progress against the Capital Programme is shown in Appendix 1. At the end of Q1, it is expected that the Programme will be delivered to budget, and this position will be reviewed throughout the financial year, updated in the Q2 and Q3 reports in due course.

7 Accounts Payable

7.1 The table below shows performance relating to payment of invoices within 30 or 10 days. Performance over the past 3 months is 95%, which is below the Corporation's target of 97%.

7.2 Performance is improving month on month, and measures are in place to improve overall performance, including clearing backlogs. Self-service has been rolled out across the force, and the transactional team is now fully staffed with a new Transactional Manager in post, who has made significant improvements to the service.

Table 8

Month	Invoices Received	Compliant Invoices	Value of Compliant Invoices	Compliant Invoices %
Apr-20	557	523	£14,402,277.65	94%
May-20	510	482	£2,636,047.86	95%
Jun-20	506	493	£2,054,962.21	97%
Q1 Total	1,573	1,498	£19,093,287.72	95%

8 Accounts Receivable

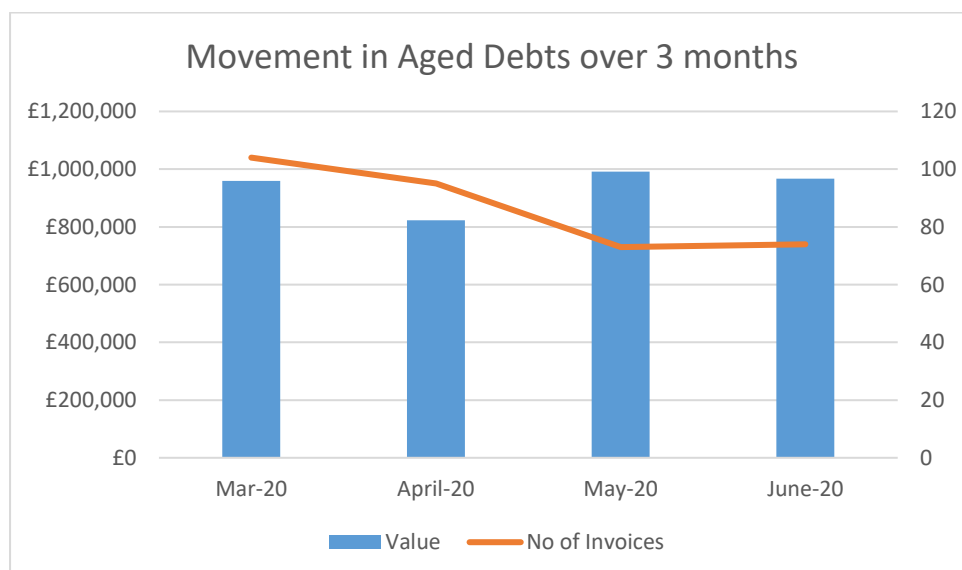
8.1 Total debtors outstanding is shown in the Table 9 below. The position is being actively monitored.

Table 9

Age	Jun-20		Change (Mar - Jun 2020)	
	Count	Value		
Less than 1 Month	19	£581,541	-42	-£224,896
1 - 2 Months	1	£261,890	-3	£245,807
2 - 3 Months	10	£2,726	4	-£61,361
3 - 12 Months	36	£109,926	12	£61,130
Over 1 year	8	£10,909	-1	-£12,861
Total	74	£966,992	-30	£7,820

Summary of Activities

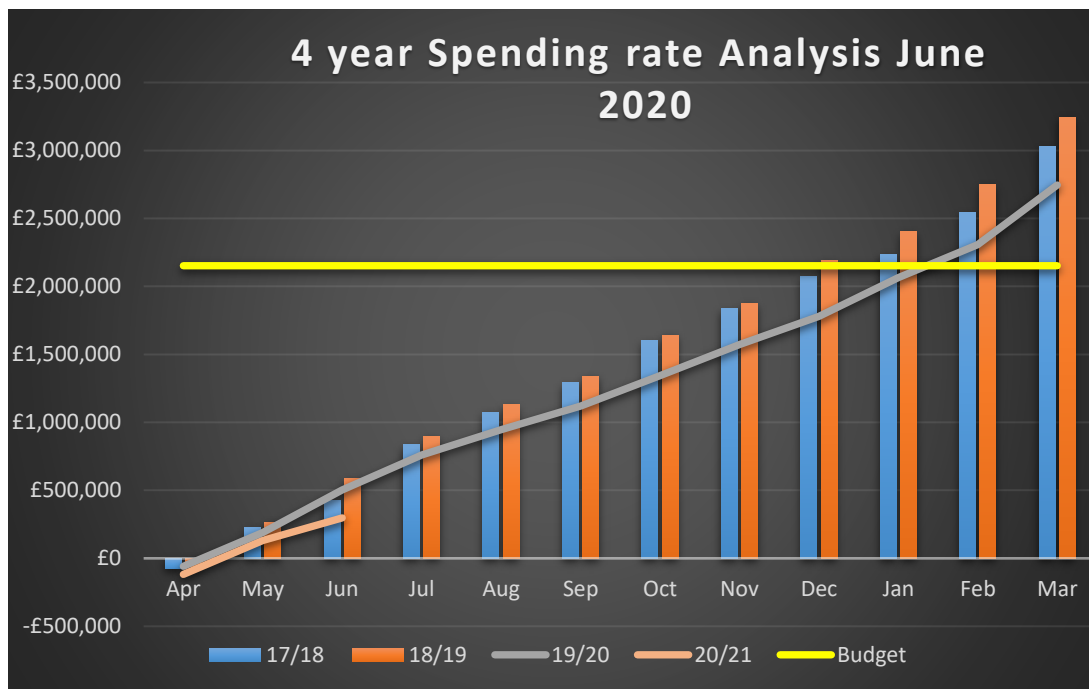
June 2020		
Summary of Movements	No	Amount £
Number of Invoices Paid	(16)	(1,121,720)
New Invoices Raised	19	581,541
Credit Notes Issued	(2)	(426,173)
Debts Written Off	0	0



8.2 The older debts relate mainly to Home Office invoices, and the invoices will be paid in due course.

9 Overtime

- 9.1 The overall overtime budget is £2.2m; £1.6m in core funded and £0.6m in funded units.
- 9.2 Gross expenditure in Q1 is £0.624m, offset by a 19/20 accrual of £0.3m, resulting in net expenditure of £0.3m. There has been a significant reduction in overtime demand during the COVID pandemic, however, this might change as and when footfall in the City increases. Based on current demand, the projected outturn position is £2.0m; £0.2m under budget.
- 9.3 Overtime expenditure for 2018/19 was £3.2m and in 2019/20 it was £2.8m. Controls are in place and clear communication has been issued to managers and budget holders to control overtime expenditure.
- 9.4 The main reasons for claiming overtime are:
- Covering for vacant posts (backfilling / Business as Usual)
 - COVID19
 - Violent Crime Operations with MET & BTP
 - Bank of England armed escorts
 - CID
 - Op Uranium
- 9.5 The largest spending Directorate is UPD, with 47% of overall overtime. The main reasons are business as usual and backfilling which accounts for 42%. 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 unknown policing requirements.
- 9.6 The chart below shows cumulative overtime expenditure over the last 3 years, which projects a year-end reduction in the current financial year compared to previous years.



10 Coronavirus (COVID-19)

10.1 COVID19 has had an impact since the start of the pandemic in mid-March 2020. In Quarter One, the financial impact of COVID19 totals £0.63m, which includes on overtime (£130,000), loss of income from the Economic Crime Academy (£264,000), additional spend on IT to allow home working (£73,000), cleaning and various health and safety measures (£164,000). COVID19 related expenditure is currently reducing month on month, and the position will be closely monitored for the rest of the financial year.

10.2 The combination of monthly expenditure and loss of income is summarised below:

Table 10

	COVID-19 spend £
Mar	298,378
April	139,708
May	95,295
June	97,463
Total	630,844

10.3 Police Forces in the UK were provided with an additional Home Office ring-fenced grant as an incentive towards speedy recruitment towards the Year 1 National Uplift. The CoLP ring-fenced grant allocation for 2020/21 was £1.2m.

10.4 Whilst recruitment towards the 20,000 national officer uplift remains a top priority for the Government, forces were encouraged to continue using the ring-

fenced grant for this purpose. However, a degree of flexibility has been allowed to claim 50% of this allocation towards losses incurred due to COVID-19 disruption. CoLP has claimed £0.3m against COVID related expenditure of £0.6m to date.

11 Use of Reserves

11.1 The Police reserves position is summarised in Table 11 below

Table 11

	Opening Balance £'m	Projected Spend £'m	Projected Closing Balance £'m
Earmarked Reserve	(0.20)	0.20	0.00
POCA	(1.40)	0.00	(1.40)
Action Fraud	(2.70)	2.70	0.00
Transformational Funding	(0.10)	0.10	0.00
Total	(4.40)	3.00	(1.40)

11.2 Unusual for a Police Force, CoLP does not currently hold any general reserves as the Corporation of London is in effect acting as a guarantor. These arrangements are under review, and subject to a separate report on the Police Authority Board agenda.

11.3 The POCA reserve relates to the National Asset Recovery Incentivisation Scheme (ARIS), where relevant agencies get back a proportion of what they recover. This is an unusual arrangement requiring the ongoing agreement of the Home Office. Although the use of ARIS allocations is a matter for each agency, there is an expectation that such funds are used to improve performance on asset recovery and to fund local crime fighting priorities for the benefit of the community in the following categories:

- Asset Recovery Work
- Crime Reduction projects
- Community Projects
- Miscellaneous expenditure

- 11.4 Expenditure is subject to an annual audit, and there is an expectation that all ARIS funds are completely utilised in-year. CoLP's POCA reserve relates to unspent balances built up over a number of years, over and above the annual £0.5m estimated receipts which is built into the base budget.
- 11.5 The opening balance at the start of the financial year was £1.4m. Expenditure from the POCA reserve is subject to a bidding process via the Strategic Finance Board, where bids are assessed against the categories set out above. The reserve is not utilised for projects that require ongoing revenue funding such as the establishment of new posts or new IT systems which attract ongoing revenue costs. Due to the nature and the audit requirements relating to ARIS funds, the POCA reserve should not be viewed as a general reserve to be used to support the revenue budget. Doing so might compromise future arrangements with the Home Office.
- 11.6 It is anticipated that the Action Fraud reserve will be fully utilised by the end of the financial year, except for year end balances relating to timing issues.

12 Risk Management

- 12.1 Table 12 below identifies the key risks and mitigating controls contained within this report: (quantum included where possible)

Risk	Risk Mitigation
COVID19	Overtime / Increased crime / delays in recruitment / holding high level of vacancies / sickness absence
Loss of Grants and Income	TfL Grant – 3 quarters = £1.3m International training - £0.4m Economic Crime Academy - £0.6m
Action Fraud	Outcome of dispute / additional costs / insufficient budget underspend to cover all costs
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	The vacancy factor is reviewed and revised throughout the year. All recruitment is approved by the Strategic Workforce Planning.
Budget mitigations and additional pension pressure	Monthly 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 £1.5m for Officers and £0.09m 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 may increase whilst holding a high level of vacancies
Further cost pressures for Action Fraud	Under review and close scrutiny, as covered within the body of the report
Capital Programme progress and potential slippage	The Capital Programme is monitored throughout the year, capital recharges undertaken in a timely manner.
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.

Appendix 1

The position for capital schemes in shown below.

CoLP Capital Programme 2020	Progress	Approved Budget £'000	Prior Year spend £'000	Qt 1 Spend £'000	Qt 2 £'000	Qt 3 £'000	Qt 4 £'000	Forecast 2020/21 £'000	Future years £'000	Total £'000	Variance £'000
IT Related											
PowerBI self-service data analytics tool	Not yet started	84	0	0	0	0	84	84	0	84	0
NHS Custody link	Not yet started	30	0	0	30	0	0	30	0	30	0
Chronicle system – PIP module	Order Placed	40	0	0	40	0	0	40	0	40	0
E Discovery tool	First Gateway Report for investigative work approved, £15k budget allocated so far. PAB 22/6; Project Sub 25/6	300	0	0	15	285	0	300	0	300	0
IT Modernisation	Three year Programme, as Projects are brought onboard, they will be shown individually - there is no overall Programme	6,425	0	0	0	0	2,085	2,085	4,340	6,425	0

	manager for forecasting.										
Oracle 12.2 platform upgrade	Orders placed, progressing alongside the HRI integrated project.	408	0	0	0	0	120	120	289	408	0
Custody CCTV Upgrade	Not yet started	176	0	0	0	0	176	176	0	176	0
AV Refresh	Covid 19 working situation has enabled a rethink of how best to do this	136	0	0	136	0	0	136	0	136	0
GIS Upgrade	Preparatory work is being undertaken	150	0	0	150	0	0	150	0	150	0
Covert Camera System	Not yet started	155	0	0	0	0	155	155	0	155	0
Body Worn Camera	Gateway Report for investigative work approved, £15k budget allocated so far. PAB 22/6; Project Sub 25/6	459	0	0	16	0	444	459	0	459	0
Equipment											
Tactical Illuminators	Initial purchases had to be made in 19/20 as a matter of urgency, this	76	0	0	0	0	0	0	76	76	0

	now moved to future years											
Positive Lock Baton	Investigatory work on requirements being undertaken	68	0	0	0	0	68	68	0	68	0	
Fleet		0	0	0	0	0	0	0	0	0	0	
Vehicle Fleet Replacement Project	£250,000 pa – to enable vehicles to be replaced which do not meet the criteria for the use of the £1.8m budget which is to enable non ULEZ compliant vehicles to be replaced with ULEZ compliant vehicles.	1,000	0	0	0	0	250	250	750	1,000	0	
Accommodation												
Essential estate / security upgrades	£100k has been provisionally allocated in 20/21 – costs of CCTV and Armoury move are being reviewed	185	0	0	15	75	10	100	85	185	0	
Total 20/24 Capital Programme		9,692	0	0	401	360	3,391	4,152	5,540	9,692	0	

Pre 2020/21 Capital Programme	Progress	Latest Approved Budget (Adjusted *) £'000	Prior Year spend £'000	Qt 1 Spend £'000	Qt 2 £'000	Qt 3 £'000	Qt 4 £'000	Forecast 2020/21 £'000	Future years £'000	Total £'000	Variance £'000
Airwaves	* To date gateway process has allocated £215k. The project is progressing and the budget will be spent.	1,250	25	0	142	1,061	22	1,225	0	1,250	0
Digital Interview Recording System	* £375k Project is progressing, £254k has been allocated through the gateway process.	375	0	0	250	125	0	375	0	375	0
HR integrated	Project is progressing, it has now been combined with the oracle upgrade project approved in 20/21	425	259	0	0	0	165	165	0	425	1

Fleet	* £1.8mill plus £0.1m. A budget has been released for £391k purchases. CoLP have prepared a vehicle replacement plan to for the remaining non ULEZ compliant vehicles to be submitted through the CoL approval process.	1,909	13	0	444	216	1,236	1,896	(0)	1,909	0
Ring of Steel	The programme is practically complete and the closure report will be prepared and submitted.	2,899	2,567	3	144	0	185	332	0	2,899	0
Emergency Services Mobile Communications Programme (ESMCP)	This relates to preparatory work in readiness for the delayed National Programme – further work is required and the budget will be spent.	1,821	1,431	0	14	7	369	391	0	1,821	0
Accommodation - Decant and preparation for Fleet House and other changes to Police Accommodation	Progress and spend is reported to Capital Buildings Committee.	13,908	8,252	156	534	389	3,610	4,689	735	13,675	232

IT Modernisation/Telephony etc.	CoL IT managed projects	6,329	2,016	1,046	136	0	1,944	3,126	1,187	6,329	0
Total Pre 20/21 Cap Prog		28,916	14,562	1,205	1,665	1,799	7,530	12,199	1,922	28,683	233

Total Capital		38,608	14,562	1,205	2,066	2,159	10,922	16,351	7,461	38,375	233
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Funding Not identified											
Emergency Services Mobile Communications Programme (ESMCP) - Future years requirement		6,483	0	0	0	0	0	0	6,483	6,483	0

SAVINGS TRACKER - September 2020

IN-YEAR PERFORMANCE - 2020								
Ref	Saving Name	Description	Lead	How is this is treated on ledger	2020/21 Target £'000	2020/21 Actual £'000	2020/21 Forecast £'000	2020/21 Variance £'000
1	New Target Operating Model (structural element)	Removal of duplicated posts and improved rank / grade ratio. Cessation of non-core activities (e.g. Coroners service). Reduction in back office costs and administrative functions through expansion of internal self-service facilities incl. overtime / expenses	Oliver Shaw	Budget removed from base in 20/21	860	860	860	0
2	Enlarging the 'police family' incl. increased use of CSAS powers	Reduction in variable costs (e.g. overtime linked to the policing of major events such as LMS / London Marathon / Christmas Campaign	Oliver Shaw	Budget removed from base in 20/21	100	0	100	0
3	Improved use of existing resources - overtime	Reduction in variable operational costs (e.g. overtime payments) through the introduction of variable shift patterns	Oliver Shaw	Budget removed from base in 20/21	50	50	50	0
4	Improved use of existing resources - annualised hours	Better deployment of officers in support of Operational Orders through introduction of annualised hours shift pattern	Sarah Williams	Budget removed from base in 20/21	200	38	200	0
5.1	Participation in efficiency related national policing programmes - Natioonal Enabling Programme (NEP)	National Enabling Programme (NEP): provides a central IT spine for policing / cloud computing	Martin Green	Unallocated Savings - savings yet to be found. Offset budget to be reduced once found	300	0	300	0
5.2	Participation in efficiency related national policing programmes - National Enbaling Programme (NEP)	National Enabling Programme (NEP): provides a central IT spine for policing / cloud computing	Martin Green	Unallocated Savings - savings yet to be found. Offset budget to be reduced once found	700	0	700	0
5.3	Participation in efficiency related national policing programmes - Single Online Home (SOH)	Single Online Home (SOH): provides a common web platform across policing	Alex Njegovan	Unallocated Savings - savings yet to be found. Offset budget to be reduced once found	200	0	200	0

Saving Delivery		Action Plan
G		Saving achieved - Posts held in Holding Branch pending finalisation of Target Operating Model. 2 posts have already been removed from the finance structure due to reduction in transactional processing requirements and 1 from HR. A further post will be removed from HR in 2020/21. Equivalent Holding Branch posts now removed from CoLP's Target Operating Model (future workforce requirements).
G		Saving achieved - Changes to variable shift patterns introduced in order to reduce the need for overtime. Saving applied to overtime budget
G		Saving achieved - Changes to variable shift patterns introduced in order to reduce the need for overtime. Saving applied to overtime budget
G		05/05/2020: Update - The new functionality has been completed the supplier but only for the 2021 release due later this year. Due to the delays in both signing the contract, raising the PO and Covid-19 the upgrade will not be completed to save the funding this financial year. There may be another option to implement something soon but this need to be explored in more detail and work done around the impact and savings which are likely to be less than original predicted. This will be discussed at the next HR Integrated Project Board but will need to be done in conjunction with the Transform Programme. Saving to be achieved through reduction in overtime budget. May not achieve full year effect (Q3 and Q4 only), so additional savings may have to be found in other areas. Annualised hours cannot be implemented until the Oracle upgrade and the latest version of Origin HR have been installed and tested. Currently this is unlikely to be until September 2020 at the earliest. If this timeline changes the action will be updated further, but for the foreseeable future there will be no change.
R		National Enabling Programme (NEP): MintTulip consultants estimate a revenue saving of £300K pa. £300,000 will be found from IT systems savings, e.g. a review of current systems and devices.
R		National Enabling Programme (NEP): Will deliver a reduction in staffing costs through collaborated service delivery and automated processes (£700K). Five initial 'Use Cases' for NEP have been developed pending introduction of new software and sytems. These are: Chief Officer Group Governance, Video Training, Crime Prevention Engagement, Daily Management Meetings, Authorisation for Foreign Travel. As there is a delay nationally rolling out this programme, a new holding branch will be established, containing vacant posts that may be deleted in line with the national programme roll out.
R		Single Online Home provides CoLP with an opportunity to channel shift demand onto its website - and automate manual processes.(£200K). A new holding branch will be established, containing vacant posts that may be deleted in line with the roll out of this programme.

FUTURE YEAR TARGET			
2021/22 Target £'000	2022/23 Target £'000	2023/24 Target £'000	2024/25 Target £'000
860	860	860	860
200	300	300	300
50	50	50	50
200	200	200	200
300	300	300	300
700	700	700	700
200	200	200	200

5.4	Participation in efficiency related national policing programmes - National Law Enforcement Data Service (NLEDS)	National Law Enforcement Data Service (NLEDS): merges duplicated information systems	Project yet to be initiated	Unallocated Savings - savings yet to be found. Offset budget to be reduced once found	100	0	100	0	R	National Law Enforcement Data Service provides CoLP with an opportunity to reduce duplication and introduce automated processes (£100K) . 'As there is a delay nationally rolling out this programme, a new holding branch will be established, containing vacant posts that may be deleted in line with the national programme roll out.	100	100	100	100
6	Participation in efficiency related national policing programmes - NCB	National Commercial Board Programme (NCB): will explore opportunities to enter shared service agreements across policing in areas such as legal services, fleet and procurement	TBC	N/A	0	0	0	0	G	National Commercial Board (NCB) programme predicts savings of £350m across policing. Pro rata, CoLP share would be circa £2m p.a. Recognising the force's existing level of local authority collaboration – expectation is 10 – 20% of this figure. No saving required for 2020/21. Future arrangements to be progressed for 2021/22	400	400	400	400
7	IT Transformation - Rationalisation of existing systems	Subsuming functionality within the force's existing Record Management System (Niche RMS). Deletion of licencing costs for existing forensic / operational diary solutions	Pete Digby / Jonathan Chapman	N/A	0	0	0	0	G	Niche forensic model - time savings in existing forensic systems. Remains on review for 2021/22	100	100	100	100
8	IT Transformation - Rationalisation of IT hardware	30% reduction in monthly SIM / contract costs	Jonathan Chapman	Budget removed from base in 20/21	20	0	40	20	G	Full review of equipment, devices and lines being undertaken by IT. Review of telephone contracts also underway. Over achieved by £20k	20	20	20	20
9.1	Commercial activity & income generation	Sponsorship - Mounted Branch	David Lawes / Cecilie Booth		100	0	0	(100)		At risk	1,050	1,350	1,650	1,700
9.2	Commercial activity & income generation	International Training	David Lawes / Cecilie Booth	Budget increased by £100k (19/20 - £300k, 20/21 - £400k)	100	0	100	0		International training (£100k) at risk	0	0	0	0
9.3	Commercial activity & income generation	Review of Funded Units	David Lawes / Cecilie Booth	Base budget reflects additional charge to funders	250	0	620	370		Review of funded units - £620k achieved -	0	0	0	0
9.4	Commercial activity & income generation	Review of fees and charges	David Lawes / Cecilie Booth	Income target of £50k set in 20/21 base budget	50	0	50	0		Review of fees and charges (£50k) ongoing until year end	0	0	0	0
9.5	Commercial activity & income generation	Re-negotiation of existing contracts	David Lawes / Cecilie Booth	Budget increased by £200k (19/20 - £0.8m, 20/21 - £1m)	200	0	233	33		Tasers £92k, Tactical Illuminators £76k, community policing £45k and superintendent funding of £20k.	0	0	0	0
9.6	Commercial activity & income generation	New income stream - Merchandising	David Lawes / Cecilie Booth	Income target of £50k set in 20/21 base budget	50	0	50	0		New income stream from merchandising (£50k) starting from September 2020	0	0	0	0
9.7	Commercial activity & income generation	Driving School	David Lawes / Cecilie Booth	Income target of £100k set in 20/21 base budget	100	0	100	0		Driving School (£100k), at risk due to COVID	0	0	0	0
9.8	Commercial activity & income generation	Firing Range	David Lawes / Cecilie Booth	Income target of £100k set in 20/21 base budget	100	0	100	0		Firing Range (£100k), at risk due to COVID	0	0	0	0
10	Digitisation of external services	Roll-out of on-line payments for fines and linked enforcement activity (e.g. administration process for seized vehicles)	Sarah Williams (TBC)	Unallocated Savings - savings yet to be found	100	0	100	0		Handheld devices to enable spot fines not currently charged (£50,000). Introduction of online payments (£50,000)	100	100	100	100
11	Expanding collaborative opportunities (3ES / other public organisations)	Joint service provision of offender management and mental health services	Oliver Shaw		0	0	0	0		Savings to be identified for 2021/22	120	120	120	120
12	Average salary reduction through recruitment policy	Bringing in new recruits at the lower end of the pay band as opposed to the higher end	Julia Perera	Unallocated Savings - SAVINGS NOW FOUND	400	533	533	133	G	Saving equates to 16 PC vacancies costed at the top of the grade but filled by probationers. Difference between top and bottom of the grade is £25k. Vacant posts costed at top of the grade. Current workforce predominantly at the top of grade. Vacancy management will increase this further. UPDATED 8th June 2020 - £533,000 savings delivered in 20/21 with 24 probationers brought into Force at the end of March 20. Difference between top and bottom of actual brought in equates to £22,216 per officer (£22,216 * 24 = £533,000)	500	750	1,300	2,350

13	GYE Estates / FM arrangements	Efficiencies in FM spend at GYE. Linked to the shared services review, aim to eliminate duplication between COL and CoLP	Martin O'Regan	Unallocated Savings - savings yet to be found	170	0	85	(85)
14	Support services	Review of support service provision. Clearer alignment between COL and CoLP and reduction in duplication and inefficiency. Including Procurement, Transactions, IT, Corporate Comms. Using HMIC and CIPFA benchmarks.	Cecilie Booth	Unallocated Savings - savings yet to be found	350	0	350	0
15	Asset Recovery	POCA and asset recovery income	Paul Curtis	Budget increased in 20/21 base budget (from £500k target to £600k)	100	0	100	0
16	Roll out of new accommodation, Estates and Fleet	Closure of Snow Hill and Wood Street Police Stations. Rationalisation of existing FM contracts and fleet replacement	Martin O'Regan	Budget removed from base in 20/21	496	0	496	0
					634	0	0	(634)
Total					5,730	1,481	5,467	(263)

A	Saving to be delivered from review of 24/7 manned reception and security arrangements at GYE. PO to be raised for new doors. CCTV costs pending. Door control for lift & lift car adjustments cost pending. Estimates have now been received for the enabling works to allow the security contract to be terminated. However, due to COVID-19 impact agreement of works completion cannot be confirmed. If works are delayed by 6 months of the financial year then 50% savings will only be achieved against the original target of £170k.
G	Savings from duplication between COL and CoLP. At this stage, around £350k of savings are being sought to be delivered predominately from Procurement.
G	A more proactive approach to asset recovery. Identification of all regional grants and funding and shared arrangements with MPS.
G	Saving to be delivered through the closure of Snow Hill and Wood Street. Budgets have been removed as part of detailed budget setting. Saving includes closure of Shakespeare Tower. Delays to closure of Wood Street will put pressure on achieving the full saving in 20/21. Update Snow Hill - closure achieved and all costs from April 2020 being charged to CoL. Only risk will be loss of search staff w/c 16th March if Corona virus impact.
R	Wood St / target remains Dec. Currently on target. Possible risk is delay of DOSF. Wood Street remains a risk dependent upon completion of external projects.

170	350	450	500
380	450	800	850
100	100	200	200
496	496	496	496
634	634	634	634
6,680	7,580	8,980	10,180

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Committee(s): Police Authority Board Professional Standards and Integrity Committee	Date(s): 6 th October 2020 26 th November 2020
Subject: Use of Algorithms and AI within City of London Police	Public
Report of: Commissioner of Police Pol 69-20	For Information
Report author: Gary Brailsford-Hart Director of Information (CISO & DPO)	

Summary

The police service continues to attract the attention of the media in respect of how it uses technology to fulfil its policing purposes. Most notably the use of advanced technology such as analytical algorithms, artificial intelligence (AI) and facial recognition. Specifically, attention has been drawn to how Action Fraud makes use of technology in determining suitability for investigation.

This report provides a response to the instruction from the September Police Authority Board in relation to reporting on the use of algorithms and artificial intelligence across the City of London Police.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. At the September Police Authority Board a member query was escalated to the Chairman regarding the use of algorithms by Action Fraud in determining which cases are progressed for investigation and its compatibility with Article 22 (automated individual decision-making, including profiling) of the General Data Protection Regulation (GDPR). An instruction was therefore given to produce a report on this specific question and was expanded to include details of any systems in use across the force making use of algorithms and/or artificial intelligence in automated decision making.
2. It is important to clarify and differentiate the use of algorithms from artificial intelligence. Algorithms take an input applies mathematics and logic to produce the output. Artificial Intelligence Algorithms take inputs and outputs simultaneously to learn the data and produce outputs. Therefore an algorithm defines the process through which a decision is made, and artificial intelligence uses training data to make such a decision.
3. The City of London Police is a Competent Authority for the purpose of Part 3 of the UK Data Protection Act (DPA) and is therefore exempt from the General Data Protection Regulations where the processing of personal Data is for the purpose of Law Enforcement. Article 22 of the GDPR does not therefore apply. However, Section 49, a similar provision, exists within Part 3 of the DPA.

Current Position

4. Under article 37 of GDPR the Force is required to appoint a Data Protection Officer (DPO). This post carries a number of statutory responsibilities including the requirement to be independent and report to the highest management level. The Force has appointed an officer of sufficient seniority with direct access to the Chief Officer team and is involved in all aspects of data management and decision making across the force, including the consideration of new and emergent technology.
5. Nearly all force systems make use of algorithms, for example the crime system makes use of automated record expiration in accordance with the Management of Police Information, a set of standard instructions and conditions forming the input and the record being marked for disposal is the output. Even though these algorithms produce outputs to assist the volume and complexity of police and corporate systems they are not automated in their decision making, they merely present the output to an operator who will then make a decision or perform a task.
6. A recent review of Action Fraud business process has been conducted by the Office of the DPO in the determination of the extent to which automated decision making is taking place and whether or not further action is required.

7. The findings of this review highlighted that whilst the capability exists within the solution to automatically determine a prioritisation of fraud reports through the use of algorithms these are not currently used (due to errors within the software) to determine whether or not a case is suitable for dissemination to a partner organisation for investigation. At this time the Action Fraud process produces datasets that are then reviewed by a dedicated team of analysts for development of cases and possible dissemination. Due to the volume of reports, many will not be selected for inclusion in the dataset. Although this is a partly manual process, once the criteria have been set, reports are selected without further human intervention and this meets the definition contained in DPA section 49(1): *A controller may not take a significant decision based solely on automated processing unless that decision is required or authorised by law.*
8. The use of automated decision making has to be authorised by law, but this doesn't mean that there has to be a law which explicitly states that solely automated decision-making is authorised for a particular purpose. The Data Protection Act refers only to a decision which is 'required or authorised by law' (Chapter 2, Part 2, Section 14 (3)(b)).
9. As we have statutory and common law power to detect and investigate crime, and if we determine that automated decision-making/profiling is the most appropriate way to achieve this purpose, then we are able to justify this type of processing as authorised by law and rely on Article 22(2)(b). However we must be able to show that it's reasonable to do so in all the circumstances.
10. Policing activity is extensively regulated and it is reasonable to conclude that the processing is lawful.
11. The Office of the DPO has established safeguards within the organisation to ensure that any processing of information is fully considered and in accordance with the Data Protection Act and applied GDPR. A Data Protection Impact Assessment (DPIA) (Appendix 2) is conducted where any new processing is taking place and every DPIA is subject to review and approval by the DPO, any high risk processing is identified through this process and the DPO will raise any concerns directly with the Chief Officer team or the Information Commissioners Office if appropriate.
12. In addition to the DPIA, the Office of the DPO is introducing a Data Ethics Framework (Appendix 3) to ensure that processing is considered on ethical grounds as well as legislative compliance. The process is currently in the early stages of implementation but is considered a necessary approach to support future technical, procedural and analytical ambitions.
13. The force does not currently make use of artificial intelligence (AI) in any of its operational systems. However, it is anticipated that AI will become more mainstream in the technical systems being deployed to assist policing and we would be naïve to not ensure we are able to lawfully and ethically exploit this technology to ensure we are effective in protecting the public. By contrast we are already seeing criminals using AI to commit crime unhindered by geographic boundaries or regulation.

14. National Policing and Government are developing frameworks to support the Police in the use and exploitation of technology in contentious areas, such as data analytics and facial recognition. However, although the production of such frameworks will guide the implementation of those technologies they will still be subject to the established data protection regime across the City of London Police.

Conclusion

15. The use of algorithms in the automated decision making by Action Fraud is proportionate, necessary and lawful. There are sufficient safeguards in place to ensure that information is being processed in accordance with the Data Protection Act 2018.
16. The use of algorithms across the Force is common place but are relatively simple operators and are not used for any significant decision making. Therefore it is not considered relevant for data protection act purposes.
17. Although artificial intelligence is not currently in use, the Force will be seeking opportunities to enhance our policing capabilities in accordance with the pace and demands of modern policing ensuring this is undertaken in a lawful, ethical and timely manner.

Appendices

- Appendix 1 – UK Data Protection Act 2018 considerations
- Appendix 2 – CoLP Data Protection Impact Assessment Template
- Appendix 3 – CoLP Data Ethics Framework Template

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Appendix 1 – Data Protection Act 2018 Considerations

City of London Police is a *Competent Authority* for the purpose of Part 3 of the Data Protection Act and is therefore exempt from the General Data Protection Regulations where the processing of personal Data is for the purpose of Law Enforcement. Article 22 of the General Data Protection Regulation (GDPR) does not therefore apply to the processing of fraud reports by Action Fraud/NFIB. However, Section 49 a similar provision exists within Part 3 of the DPA:

Right not to be subject to automated decision-making

(1) *A controller may not take a significant decision based solely on automated processing unless that decision is required or authorised by law.*

(2) *A decision is a “significant decision” for the purpose of this section if, in relation to a data subject, it—*

(a) *produces an adverse legal effect concerning the data subject, or*

(b) *significantly affects the data subject.*

There is no further clarification in the Act or the ICO website regarding subsection (1), but the ICO provides the following advice in respect of the similar GDPR provision:

Significant Decision

If you are unsure whether a decision has a similarly significant effect on someone you should consider the extent to which it might affect, for example, their financial circumstances...

It is therefore reasonable to conclude that the decision is significant and this section is engaged.

Required or Authorised by law

The decision has to be authorised by law, but this doesn’t mean that there has to be a law which explicitly states that solely automated decision-making is authorised for a particular purpose. The Data Protection Act 2018 (DPA 2018) refers only to a decision which is ‘required or authorised by law’ (Chapter 2, Part 2, Section 14 (3)(b))

If you have a statutory or common law power to do something, and automated decision-making/profiling is the most appropriate way to achieve your purpose, then you may be able to justify this type of processing as authorised by law and rely on Article 22(2)(b). However you must be able to show that it’s reasonable to do so in all the circumstances.

Policing activity is extensively regulated and it is reasonable to conclude that the processing is lawful.

Safeguards

Section 50 requires the following safeguards to be in place where automated processing takes place in accordance with Section 49 above:

(2) *Where a controller takes a qualifying significant decision in relation to a data subject based solely on automated processing—*

(a) *the controller must, as soon as reasonably practicable, notify the data subject in writing that a decision has been taken based solely on automated processing, and*

(b) *the data subject may, before the end of the period of 1 month beginning with receipt of the notification, request the controller to—*

(i) *reconsider the decision, or*

(ii) take a new decision that is not based solely on automated processing.

(3) If a request is made to a controller under subsection (2), the controller must, before the end of the period of 1 month beginning with receipt of the request—

(a) consider the request, including any information provided by the data subject that is relevant to it,

(b) comply with the request, and

(c) by notice in writing inform the data subject of—

(i) the steps taken to comply with the request, and

(ii) the outcome of complying with the request.

We comply with the requirement to reconsider any automated decision via the established complaints procedure and, if escalated, via PSD.

Data Protection Impact Assessment (DPIA) – Stage 1

Template Version Control			
<u>*** IMS Use Only ***</u>			
Version	Purpose/Change	Author and Role	Date
1.0	Final version	Gary Brailsford-Hart – Director of Information Management Services (IMS)	DD/MM/YYYY
1.1	Revision of numbering in section 2.9. Formatting of detail/description area. Template and DPIA version controls added.	Jonathan Hands – Senior Information Officer in IMS	29/04/2020
1.2	Data flow diagram requirement added to 2.4 and structured requirements added to 2.5 and 2.11.	Jonathan Hands – Senior Information Officer in IMS	07/07/2020
1.3	Headings introduced to 2.1 for ease of understanding.	Jonathan Hands – Senior Information Officer in IMS	21/09/2020

DPIA Version Control			
Version	Purpose/Change	Author and Role	Date
			DD/MM/YYYY

This form is Stage 1 of the Data Protection Impact Assessment (DPIA) process. You are advised to refer to the guidance material available here before completing the form.

Data Protection Impact Assessment (DPIA)

Please provide as much detail as possible, avoiding technical language and acronyms, explaining the proposal in a way that someone with no prior knowledge could easily understand.

Section 1 - Governance

Project Proposal Name:	
Information Asset Owner:	
Information Custodian:	
DPIA Coordinator:	
Date on which processing will commence:	DD/MM/YYYY
Date submitted to IMS:	DD/MM/YYYY

Note: IMS will give an **initial response** within 10 working days of receiving the completed form.

IMS Assessment

IMS Use Only

A. DPIA is not mandatory.	<input type="checkbox"/>	
B. DPIA is not required as long as the remedial action listed is carried out. If the remedial action is not carried out, a DPIA will be required.	<input type="checkbox"/>	
C. DPIA is mandatory.	<input type="checkbox"/>	

Section 2 - Purpose, Scope and Context

In this section you must explain what the processing is, who it will involve, and the intended impact. You must also demonstrate why the processing is necessary and proportionate, providing evidence to support your assessment.

- The processing must be **necessary** for the specific objective of the proposal.
- It must also be **proportionate**, meaning that the advantages resulting from the processing should not be outweighed by the disadvantages to individuals.

2.1 Please briefly explain the specific aim and purpose of the proposal in a way that someone with no prior knowledge could easily understand; avoid technical language and acronyms.

Aim and Purpose (policing, law enforcement, etc.);

Necessity;

Proportionality;

2.2 What categories of personal data will be processed? Provide an overview of the categories of personal data that will be processed, for example: names, DOBs, addresses, health data, criminal records, or any other unique identifiers such as IP addresses, usernames, e-mail addresses.

2.3 Will special category data be used in the proposal? (Select all that apply)

- | | |
|--|---|
| <input type="checkbox"/> Race | <input type="checkbox"/> Trade union membership |
| <input type="checkbox"/> Ethnic origin | <input type="checkbox"/> Genetic Data |
| <input type="checkbox"/> Political opinions | <input type="checkbox"/> Biometric Data |
| <input type="checkbox"/> Sex life | <input type="checkbox"/> Sexual orientation |
| <input type="checkbox"/> Religion | <input type="checkbox"/> Health |
| <input type="checkbox"/> Philosophical beliefs | <input type="checkbox"/> None |

2.4 How will the data be collected? Briefly outline how you will obtain the data, examples include: directly from data subjects, from another data set already in the COLP's possession, from a partner agency.

2.4.1 Information lifecycle/data flow diagram. Please provide a diagram or table indicating the flow of data within this proposal, from "cradle (source) to grave (deletion)". This should reflect the information lifecycle.

2.5 How will the data be used? Briefly describe how the data will be used, recorded, and stored and who it will be shared with.	
<p>How the data will be used (intel development, prevent and/or detect crime, bring offenders to justice, etc.);</p> <p>How the data will be recorded (online report, Niche, LAN drives, etc);</p> <p>How the data will be stored;</p> <p>Who it will be shared with;</p>	
2.6 How many individuals will the processing affect? (Please specify one answer below)	
<input type="checkbox"/> Fewer than 100 data subjects <input type="checkbox"/> 100 to 1000 data subjects <input type="checkbox"/> 1000 to 5000 data subjects <input type="checkbox"/> More than 5000 data subjects	
2.7 What categories of data subject are involved? (Please select all applicable categories below)	
<input type="checkbox"/> Persons suspected of having committed or being about to commit a criminal offence <input type="checkbox"/> Persons convicted of a criminal offence <input type="checkbox"/> Persons who are or may be victims of a criminal offence <input type="checkbox"/> Witnesses or other persons with information about offences <input type="checkbox"/> Children or vulnerable individuals <input type="checkbox"/> COLP staff (current and former) <input type="checkbox"/> Other	
<p>If other then please provide further details below: Click here to enter text.</p>	
2.8 Will it involve the collection of new information about individuals? Will the COLP collect data that it has not previously collected or had access to? An example of new information is medical data, facial recognition, track and trace, etc.	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
2.9 Data Sharing Does the processing involve:	Select one option

2.9.1	Data being shared with third parties external to the COLP or recipients that have not previously had routine access to the information?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.9.2	Transferring data outside the UK but within the EU?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.9.3	Transferring data outside the EU?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.9.4	Storing data using a cloud service provider?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.9.5	Is there an MoU, contract, or other sharing agreement in place with all parties with whom data will be shared?	<input type="checkbox"/> Yes – agreements in place <input type="checkbox"/> Yes – agreements to be signed off following DPIA(s) sign off <input type="checkbox"/> Not yet – agreements required <input type="checkbox"/> No – none required

2.10 Why it is necessary to use personal data to achieve the aim and why can't the aim be achieved by other means?
 For example, can the aim be achieved by using less data or different types of data?
 Are all categories of data necessary to achieve the aim?

2.11 Explain how the use of personal data is proportionate to the aim of the proposal. Weigh the advantages of achieving your purpose against disadvantages to data subjects.

Advantages of achieving the purpose;

Disadvantages to data subjects;

Balance;

Section 3 – Lawful Basis

3.1 Lawful Basis

To process personal data you must have a lawful basis. Please select the one appropriate lawful basis from the drop down list.

Lawful Basis for **Operational Data** (Personal data processed for law enforcement purposes):

Choose an item.

Lawful Basis for **Administrative Data** (Personal data processed for non-law enforcement purposes, e.g. for HR or Commercial purposes):

Choose an item.

3.2 Further Special Category Lawful Basis

If processing special category data (section 2.3) you must have identified a further lawful condition

Operational Data:

The processing is strictly necessary (please tick to confirm) ☐

AND

One of the following conditions applies (select from the list):

Choose an item.

Administrative Data

It is necessary for one of the following conditions (select from the list):

Choose an item.

OR

It is in the substantial public interest (tick to confirm) ☐

AND for the following purpose:

Choose an item.

Section 4 – Review, Retention and Disposal

4.1 Does the proposal have a review, retention and disposal process that complies with COLP Policy? All records must have an initial retention period set by the owner of the information when first created or received; review and disposal criteria are defined within the COLP IM document suite.

- ☐ Yes
☐ No

Section 5 – ICO: Additional Factors

The Information Commissioner's Office have published a number of factors that present a 'high risk' when processing personal data. Saying yes to one or more of the following may indicate that the processing is high risk and a Stage 2 DPIA is likely to be required.

Does the processing involve:		Please check either Yes or No	If 'Yes' then please provide further details
5.1	Systematic, extensive and large scale profiling and automated decision-making about people? <i>"Any systematic and extensive evaluation of personal aspects relating to natural persons which is based on automated processing, including profiling, and on which decisions are based that produce legal effects, or significantly affect the natural person"</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.

	<p>Profiling is any form of processing where personal data is used to evaluate certain personal aspects relating to an individual, including the analysis or prediction of an individual's performance.</p> <p>Automated decision-making involves making a decision that affects someone by technological means without human involvement, for example issuing speeding fines solely based on evidence captured from speed cameras.</p>		
5.2	<p>Large scale use of special category data or criminal offence data? <i>"Processing on a large scale of special categories of data, or personal data relating to criminal convictions and offences referred to in Article 10"</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.3	<p>Public monitoring? <i>"Systematic monitoring of a publicly accessible area on a large scale"</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.4	<p>New technologies or techniques? <i>"Processing involving the use of new technologies, or the novel application of existing technologies (including Artificial Intelligence)"</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.5	<p>Profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit? <i>"Decisions about an individual's access to a product, service, opportunity or benefit which is based to any extent on automated decision-making (including profiling) or involves the processing of special category data"</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.

5.6	Biometrics/genetic data? <i>"Any processing of biometric data" and/or "any processing of genetic data other than that processed by an individual GP or health professional, for the provision of health care direct to the data subject" Biometric data can include Facial Recognition technology, fingerprints and is defined as</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.7	Data matching? <i>"Combining, comparing or matching personal data obtained from multiple sources"</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.8	Invisible processing? <i>"Processing of personal data that has not been obtained direct from the data subject in circumstances where providing a Privacy Notice would prove impossible or involve disproportionate effort"</i> For example, when gathering data, without the knowledge of the data subject, in the course of a COLP investigation.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.9	Tracking? <i>"Processing which involves tracking an individual's geolocation or behaviour, including but not limited to the online environment"</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.10	Targeting of children or other vulnerable individuals? <i>"The use of the personal data of children or other vulnerable individuals for marketing purposes, profiling or other automated decision-making, or if you intend to offer online services directly to children"</i> For example, the use of personal data relating to children for the purposes of marketing their online safety products.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.

5.11	<p>Risk of physical harm? <i>"Processing is of such a nature that a personal data breach could jeopardise the [physical] health or safety of individuals".</i></p> <p>For example, if data relating to CSAE, HUMINT or protected persons data was compromised then it could jeopardise the safety of individuals.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.12	<p>Evaluation or scoring? <i>"Aspects concerning the data subject's performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements" For example, as part of an COLP recruitment process.</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.13	<p>Data processed on a large scale. <i>Considerations include:</i></p> <ul style="list-style-type: none"> <i>• The number of data subjects concerned</i> <i>• Volume of data and/or range of data items</i> <i>• Duration, or permanence, of the data processing</i> <i>• Geographical extent of data processing</i> 	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.
5.14	<p>Preventing data subjects from exercising a right? <i>The rights are:</i></p> <ul style="list-style-type: none"> <i>• The right to be informed</i> <i>• The right to access data</i> <i>• The right to rectification</i> <i>• The right to erasure</i> <i>• The right to restrict processing</i> <i>• The right to object</i> <i>• The right to portability</i> <i>• Rights relating to automated processing</i> 	<input type="checkbox"/> Yes <input type="checkbox"/> No	Click here to enter text.

Please forward the completed form to IMS via the Data Protection mailbox account.

Data Protection Impact Assessment (DPIA) – Stage 2

Template Version Control			
<u>*** IMS Use Only ***</u>			
Version	Purpose/Change	Author and Role	Date
1.0	Final version	Gary Brailsford-Hart – Director of Information Management Services (IMS)	DD/MM/YYYY
1.1	Formatting of detail/description area. Additions to consultation groups. Template and DPIA version controls added.	Jonathan Hands – Senior Information Officer in IMS	29/04/2020
1.2	6.1 updated.	Jonathan Hands – Senior Information Officer in IMS	21/09/2020

DPIA Version Control			
Version	Purpose/Change	Author and Role	Date
			DD/MM/YYYY

In this stage of the DPIA process you must provide full details about the lifecycle of the data and the risks associated with the proposal. The information you provide will supplement the information provided in Stage 1.

The aim of this process is to identify and mitigate risks. If any **residual risks** to individuals are **high** then the ICO must be consulted before processing commences. This should be undertaken with the expertise of the COLP Information Management Services (IMS).

Section 6 - Impact

6.1 Expanding upon the purpose outlined in Section 2.1, please detail the intended effect of the processing on: the COLP; the data subjects; and society/the general public.

Describe the benefits and disadvantages to each of the above.

Benefits to data subjects (suspects/victims);

Disadvantages to data subjects (suspects/victims);

Benefits to society and general public;

Disadvantages to society and general public;

Section 7 - Information Lifecycle

7.1 Diagrams and Tables

Please insert a diagram or table that demonstrates the flow of data within this proposal. You should reflect the information lifecycle.

7.2 Provide a full description of the information lifecycle

Stage of Processing	Description
Collection Where does the data originate from, who will collect it, how will the data be obtained and how often?	
Storage Describe where and how the data is to be stored.	
Use Describe how the data will be used. Describe whether it involves new technology or novel processing.	

Access Describe who has access to the data throughout the life of the processing.	
Recording Describe the processes for recording the data.	
Processors Describe the use of processors. If a third party is being used then is a contract in place to regulate the relationship? Will the data be processed outside of the UK or the EU?	
Sharing With which external organisation(s) is the data shared, what data is shared, and why? Describe any sharing that will occur within the COLP. Outline any national and international sharing or processing.	
Review and Retention Describe your plan for review and retention, linking to a retention schedule where appropriate.	
Disposal Describe the process for disposal of data, including when and how.	
7.3 Assets Describe the assets that you intend to use.	
Hardware	
Software	
Networks	
Hardcopy/paper	
Any other relevant assets	

Section 8 - Consultation

You should consider seeking the views of data subjects unless there's good reason not to. If it's not appropriate to consult then you must clearly document the reasons why. For example, if the processing is taking place without the knowledge of data subjects and consultation would prejudice a law enforcement purpose then you should make this clear. If the processing involves staff data then you consider consulting them or their representatives.

8.1 Do you intend to consult data subjects?

☐ **Yes**

If yes then outline your plan in **Section 8.2** below together with details of consultation with other stakeholders.

☐ **No**

If no then outline why this is the case in the text box. Once completed, outline whether you will consult any other stakeholders in **Section 8.2** below.

Click here to enter text.

8.2 Consultation Action Log

Explain what steps you will take, or have taken, to consult stakeholders. Stakeholders may include:

- | | |
|---|---|
| <ul style="list-style-type: none"> • Data subjects • The general public • Union representatives • Information Security • IMS • Other police forces • Biometrics Commissioner • College of Policing • Human rights groups | <ul style="list-style-type: none"> • COLP Legal • Operational Security Advisor (OpSy) • Partner agencies • Data processors • Information Commissioner's Office (ICO) • Home Office • Surveillance Camera Commissioner • National Police Chief's Council |
|---|---|

Who	When	How	Outcome

Section 9 - Full Risk Assessment

Identify and Assess Risks

In this section you must detail **all** data protection risks, as well as any associated with privacy and the rights and freedoms of individuals. **The assessment criteria outlined in italics in section 9.1 applies to all categories** in Section 9 and 10 i.e. for 'likelihood' you must always assess whether it is 'rare, unlikely, possible, likely or almost certain'.

Consider the impact on individuals and any harm or damage that might be caused, whether physical, emotional or material. Different levels of interference may occur at different stages of the information lifecycle. The European Court of Human Rights has held that a public authority merely storing data is a limitation on the human rights of data subjects.

Where risks are identified you must take steps to integrate solutions into the project and this must be recorded. If any **residual risks are 'high'** then the ICO must be consulted prior to processing commencing. Examples of risk factors are provided at the top of each section – these examples are a starting point and you must ensure that all factors relevant to your proposal are considered. If you run out of space then insert new lines into the table. When completing each section, if you are unable to identify a risk relevant to your proposal then please state "**No risks identified**".

Examples of **risks to individuals** include:

- Discrimination
- Identity theft
- Financial loss
- Reputational damage or embarrassment
- Physical harm
- Wrongful arrest or prosecution
- Loss of confidentiality
- Inability to exercise rights

Examples of **corporate risks** include:

- Failure to protect the public
- Loss of public confidence
- Civil litigation
- Reputational damage
- Regulatory action
- Breaching other legal obligations

You should identify **solutions** such as:

- | | |
|---|--|
| <ul style="list-style-type: none"> • Deciding not to collect certain types of data • Reducing the scope of processing • Reducing retention periods • Taking additional technical security measures • Following approved codes of conduct | <ul style="list-style-type: none"> • Restricting access to data • Training staff to understand the risks • Anonymising or pseudonymising the data • Using different technology • Using an alternative third party processor |
|---|--|

9.1 Data Protection Principles

1. Fair and Lawful

- Do you need to create or amend a privacy notice?
- If processing on the basis of consent, how will this be collected and recorded?

2. Purpose Limitation

- Does the processing actually achieve your purpose?
- Will the data be used for another purpose?
- How will you prevent function creep?

3. Data Minimisation

- Will you only process the data needed for your purpose?
- How will you ensure and maintain data quality?

4. Accuracy

- How will you ensure data can be corrected or amended?
- Will you ensure data is accurate and up to date?

5. Retention

- Do you have a review, retention and disposal policy?
- Can data be deleted/erased from all COLP systems if required?
- Is the retention period necessary and proportionate?

6. Security

- What technical and organisational measures are in place to protect data?
- How will you protect against unauthorised access, alteration or removal of data?
- What training and guidance will be given to staff?
- How would you identify and manage a breach?
- How will systems be tested?

7. Data Subject Rights

- If an individual wishes to exercise their rights, including requesting access to data, or asking for data to be corrected, amended, restricted or deleted then you must have procedures in place to recognise such a request and refer it to IMS.

9.1 Describe the source of risk and the nature of potential impact on individuals.	Likelihood of harm	Severity of harm	Initial Risk	Mitigation/ Solution	Result	Residual Risk
	1 - Rare 2 - Unlikely 3 - Possible 4 - Likely 5 – Almost Certain	1 - Insignificant 2 - Minor 3 - Moderate 4 - Major 5 - Critical	High Medium Low	Describe the mitigation and whether it will be implemented	Is the risk: - Eliminated - Reduced - Accepted	High Medium Low

9.2 Data Sharing - including the involvement of other Controllers and Processors

- What contracts, MOUs etc are in place or may be required? - What measures have you taken place to ensure third parties comply with Data Protection laws?				- What risks are involved with sharing data? - Is sharing necessary and proportionate? - Is the sharing of data being minimised?		
Describe the source of risk and the nature of potential impact on individuals.	Likelihood of harm	Severity of harm	Initial Risk	Mitigation/ Solution	Result	Residual Risk

9.3 International Transfers

- Will data be shared with a third party based outside the EU? - If you will be making transfers, how will you ensure that appropriate safeguards are put in place?						
Describe the source of risk and the nature of potential impact on individuals.	Likelihood of harm	Severity of harm	Initial Risk	Mitigation/ Solution	Result	Residual Risk

9.4 Additional Risk Factors

Describe any further risks, ensuring that any risks not already identified are included.

Describe the source of risk and the nature of potential impact on individuals.	Likelihood of harm	Severity of harm	Initial Risk	Mitigation/ Solution	Result	Residual Risk

Section 10 – Operational Data Risks - Additional Risks Relevant to Operational Data Only

This section is only applicable to proposals involving operational data. **If you are solely processing administrative data then move to Section 11.**

10.1 Data Logging

Where data is processed electronically then logs must be kept for certain actions. This is to enable effective audit of processing systems, data sharing, and to verify ongoing lawfulness of processing.

If the data is processed electronically then will a log be retained of the following actions:

- **Collection**
- **Alteration**
- **Consultation**
- **Disclosure**
- **Combination**
- **Erasure**

- ☐ Yes
☐ No*
☐ Not applicable

*If you answered "no" then you must record this as a risk below.

Describe the source of risk and the nature of potential impact on individuals.	Likelihood of harm	Severity of harm	Initial Risk	Mitigation/ Solution	Result	Residual Risk

10.2 Data Categorisation

When processing data for law enforcement purposes, you must **provide where relevant and as far as possible** a clear distinction between categories of data subject.

Will there be a clear distinction between different categories of personal data suspects, for example subjects who are:

- Suspected of having committed, or are about to commit, a criminal offence
- Convicted of a criminal offence,
- Victims of a criminal offence,
- Witnesses to a criminal offence.

- ☐ Yes
☐ No*
☐ Not applicable

If you answered "no" then you must record this as a risk below.

Describe the source of risk and the nature of potential impact on individuals.	Likelihood of harm	Severity of harm	Initial Risk	Mitigation/Solution	Result	Residual Risk

Section 11 – Outcome and Review

11.1 Outcome

Item	Name	Date	Notes
Residual risks approved by:			
IMS/DPO advice provided by:			
Summary of IMS/DPO advice, including whether the ICO must be consulted:			

11.2 Review

A DPIA is a process that should be reviewed throughout the lifecycle of the processing – it does not end at go live. Please outline the review process that you will undertake to ensure that the risk mitigations have been successful and that no new risk factors have emerged.

Outline:

- | | |
|---|--|
| <ul style="list-style-type: none"> Who will be responsible for reviewing the processing? | <ul style="list-style-type: none"> The frequency of review The date of the next review |
|---|--|

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Data Ethics Framework

Workbook

v1-0

What is data ethics? Data ethics is an emerging branch of applied ethics which describes the value judgements and approaches we make when generating, analysing and disseminating data. This includes a sound knowledge of data protection law and other relevant legislation, and the appropriate use of new technologies. It requires a holistic approach incorporating good practice in computing techniques, ethics and information assurance.

How to use the Data Ethics Framework: The Data Ethics Framework guides the design of appropriate data use in policing and the wider public sector. This guidance is aimed at anyone working directly or indirectly with data within the City of London Police, including data practitioners (statisticians, analysts and data scientists), policymakers, operational staff and those helping produce data-informed insight. The Data Ethics Framework builds on the core values of the Police Code of Ethics - honesty, integrity, confidentiality, equality and diversity - to encourage ethical data use to build better services and inform policy.

Teams should work through the framework together before starting the design or discovery phase of a new project, policy or service. Use the workbook to consider legal and ethical questions to inform the best approach for your use of data.

Each part of the framework is designed to be regularly revisited throughout your project, especially when any changes are made to your data collection, storage, analysis or sharing processes.

For advice support and guidance, please contact Information Management Service - IMSupport@

Data sources

Name/describe your project's key data sources, whether you're collecting data yourself or accessing via third parties.

Is any personal data involved, or data that is otherwise sensitive?

Limitations in data sources

Are there limitations that could influence your project's outcomes?

Consider:

- > bias in data collection, inclusion/exclusion, analysis, algorithms
- > gaps or omissions in data
- > provenance and data quality
- > other issues affecting decisions, such as team composition

Sharing data with others

Are you going to be sharing data with other organisations? If so, who?

Are you planning to publish any of the data? Under what conditions?

Ethical and legislative context

What existing ethical codes apply to your sector or project? What legislation, policies, or other regulation shape how you use data? What requirements do they introduce?

Consider: the rule of law; human rights; data protection; IP and database rights; anti-discrimination laws; and data sharing, policies, regulation and ethics codes/frameworks specific to sectors (eg health, employment, taxation).

Rights around data sources

Where did you get the data from? Is it produced by an organisation or collected directly from individuals?

Was the data collected for this project or for another purpose? Do you have permission to use this data, or another basis on which you're allowed to use it? What ongoing rights will the data source have?

Your reason for using data

What is your primary purpose for collecting and using data in this project?

What are your main use cases? What is your business model?

Are you making things better for society? How and for whom?

Are you replacing another product or service as a result of this project?

Communicating your purpose

Do people understand your purpose – especially people who the data is about or who are impacted by its use?

How have you been communicating your purpose? Has this communication been clear?

How are you ensuring more vulnerable individuals or groups understand?

Positive effects on people

Which individuals, groups, demographics or organisations will be positively affected by this project? How?

How are you measuring and communicating positive impact? How could you increase it?

Negative effects on people

Who could be negatively affected by this project?

Could the way that data is collected, used or shared cause harm or expose individuals to risk of being re-identified? Could it be used to target, profile or prejudice people, or unfairly restrict access (eg exclusive arrangements)?

How are limitations and risks communicated to people? Consider: people who the data is about, people impacted by its use and organisations using the data.

Minimising negative impact

What steps can you take to minimise harm?

How could you reduce any limitations in your data sources? How are you keeping personal and other sensitive information secure?

How are you measuring, reporting and acting on potential negative impacts of your project?

What benefits will these actions bring to your project?

Engaging with people

How can people engage with you about the project?

How can people correct information, appeal or request changes to the product/service? To what extent?

Are appeal mechanisms reasonable and well understood?

Openness and transparency

How open can you be about this project? Could you publish your methodology, metadata, datasets, code or impact measurements?

Can you ask peers for feedback on the project? How will you communicate it internally?

Will you publish your actions and answers to this canvas openly?

Ongoing implementation

Are you routinely building in thoughts, ideas and considerations of people affected in your project? How?

What information or training might be needed to help people understand data issues?

Are systems, processes and resources available for responding to data issues that arise in the long-term?

Reviews and iterations

How will ongoing data ethics issues be measured, monitored, discussed and actioned?

How often will your responses to this canvas be reviewed or updated? When?

Your actions

What actions will you take before moving forward with this project? Which should take priority?

Who will be responsible for these actions, and who must be involved?

Will you openly publish your actions and answers to this canvas?

Data Ethics Framework						
	0	1	2	3	4	5
1. Start with clear user need and public benefit	User need is not well defined					User need is clearly defined
Description of the user need with supporting evidence						
2. Be aware of relevant legislation and codes of practice	Needs clarification or expert input					Relevant laws are well understood
List the pieces of legislation, codes of practice and guidance that apply to your project.						
3. Use data that is proportionate to the user need	Reuse not proportionate					Reuse of data is clearly proportionate to achieve user need
Describe how the data being used is proportional to the user need						
4. Understand the limitations of the data	Unreliable, unsuitable data					Data is representative and accurate
Identify the potential limitations of the data source(s) and how they are being mitigated						
5. Use robust practices and work within your skillset	Needs further expert input					Methodologies clearly designed and understood
Explain the relevant expertise and approaches that are being employed to maximise the efficacy of the project						
6. Make your work transparent and be accountable	No scrutiny or peer review available					Oversight built in through life cycle of project
Describe how you have considered making your work transparent and accountable						
7. Embed data use responsibly	No ongoing plan determined					Evaluation plan developed and resource in place to deliver it
Describe the steps taken to ensure any new model, policy or service is managed responsibly						

Principle 1: Start with a clear user need and public benefit

To consider:

Describe the user need:	
Does everyone in the team understand the user need?	
How does this benefit the public?	
What would be the harm in not using data science - what needs might not be met?	
Do you have supporting evidence for the approach being likely to meet a user need or provide public benefit?	

Principle 2: Be aware of relevant legislation and codes of practice

To consider:

List the pieces of legislation, codes of practice and guidance that apply to your project:	
Do all team members understand how relevant laws apply to the project?	
If necessary, have you consulted with relevant experts?	
Have you spoken to your information assurance team?	
If using personal data, do you understand obligations under data protection legislation?	

Principle 3: Use data that is proportionate to the user need

To consider:

If using personal data, have you answered the questions for determining proportionality? You must include evidence to support any decision.	
If using personal data, what measures are in place to control access? How widely are you searching personal data?	
How can you meet the project aim using the minimum personal data possible?	
Is there a way to achieve the same aim with less identifiable data?	
Can you use synthetic data?	
Has the data being used been provided for your analysis?	
By using data that the public have freely volunteered, would your project jeopardise people providing this again in the future?	
Could you clearly explain why you need to use that data to members of the public?	
Is there a fair balance between the rights of individuals and the interests of the community?	

Principle 4: Understand the limitations of the data

To consider:

Identify the potential limitations of the data source(s) and how they are being mitigated:	
What data source(s) is being used?	
Are all metadata and field names clearly understood?	
What processes do you have in place to ensure and maintain data integrity?	
Is there a plan in place to identify errors and biases?	
What are the caveats?	

Principle 5: Use robust practices and work within your skillset

To consider:

Explain the relevant expertise and approaches that are being employed to maximise the efficacy of the project	
Describe the disciplines involved and why.	
Are there expertise that the project requires that you don't currently have?	
Have you designed the approach with a policy team or subject matter expert(s)?	
Has all subject matter context, from policy experts or otherwise, been taken into account when determining the appropriate loss function for the model?	
If necessary, how can you (or with external scrutiny) check that the algorithm is achieving the right output decision when new data is added?	
How has reproducibility been ensured? Could another analyst repeat your procedure based on your documentation?	
How confident are you that the algorithm is robust, and that any assumptions are met?	
What is the quality of the model outputs, and how does this stack up against the project objectives?	
If using data about people, is it possible that a data science technique is basing analysis on proxies for protected variables which could lead to a discriminatory policy decision?	

Principle 6: Make your work transparent and be accountable

To consider:

Describe how you have considered making your work transparent and accountable	
Have you spoken to your organisation to find out if you can speak about your project openly?	
Have you considered how both internal and external engagement could benefit your project?	
How interpretable are the outputs of your work?	
How are you explaining how approaches were designed in plain English to other practitioners, policy makers and if appropriate, the public?	
Can you openly publish your methodology, metadata about your model, and/or the model itself e.g. on Github?	
Can you get peers to review your Pull Requests?	

Principle 7: Embed data use responsibly

To consider:

Describe the steps taken to ensure any insight is managed responsibly:	
How many people will be affected by the new model, insight or service?	
Who are the users of the insight, model, or new service?	
Do users have the appropriate support and training to maintain the new technology?	
Have future events been planned for?	
Is your implementation plan correlated with the impact of a particular model?	
How often will you report on these plans to senior reporting officers?	

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