



City of London Police Authority Board INFORMATION PACK

Date: WEDNESDAY, 25 MAY 2022
Time: 10.00 am
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

9. ***CITY AND HACKNEY SAFEGUARDING CHILDREN PARTNERSHIP (CHSCP)
CHILD Q PRACTICE REVIEW**
Joint report of the Commissioner and Director of Community and Children's Services.
For Information
(Pages 3 - 50)
10. ***POLICE, CRIME, SENTENCING AND COURTS BILL**
Report of the Remembrancer.
For Information
(Pages 51 - 56)
11. ***QUARTERLY COMMUNITY ENGAGEMENT UPDATE**
Report of the Commissioner.
For Information
(Pages 57 - 72)
12. ***UPDATE ON VIOLENCE AGAINST WOMEN AND GIRLS (VAWG) ACTIVITY**
Report of the Commissioner.
For Information
(Pages 73 - 100)
22. ***NATIONAL LEAD FORCE PLAN 2020-23- REFRESH**
Report of the Commissioner of Police.
For Information
(Pages 101 - 132)

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Agenda Item 9

Committee:	Dated:
Safeguarding Sub-Committee (Community and Children's Services) – For Information	12/05/2022
Police Authority Board – For Information	25/05/2022
Professional Standards and Integrity Committee – For Information	25/05/2022
Subject: City and Hackney Safeguarding Children Partnership (CHSCP) Child Q Practice Review	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 2 and 3
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Andrew Carter, Director of Community and Children's Services Paul Betts, Assistant Commissioner, City of London Police	For Information
Report author: Chris Pelham AD People, Department Community and Children's Services DCI Claire Cresswell, City of London Police	

Summary

In 2020, Child Q, a Black female child of secondary school age, was subject to a strip-search by female police officers from the Metropolitan Police Service (MPS). The search, which involved the exposure of Child Q's intimate body parts, took place on school premises, without an appropriate adult present, and with the knowledge that Child Q was menstruating. The school is in Hackney. As a result, a Local Child Safeguarding Practice Review was initiated by the City and Hackney Safeguarding Children Partnership (CHSCP). The report was published in March 2022. [Local Child Safeguarding Practice Review: Child Q](#) concluded that Child Q should never have been strip-searched. The review found that there was an absence of a safeguarding-first approach to the practice of many of the professionals involved that day. The report also concluded that racism was 'likely an influencing factor' in the strip-search, and that there was a high level of probability that practitioners were influenced by 'adultification' bias. This is where Black and Global Majority children are held to adult standards, but their white peers are less likely to be.

The review makes eight findings and 14 recommendations for practice improvements. Some relate to process, data and guidance: police engagement in the Local Child Safeguarding Practice Review (LCSPR) process (R1), MPS data on strip searches (R2), updating the Department for Education (DfE) guidance for schools on searching, screening and confiscation (R3 & R10), updating the MPS guidance and local policy around Appropriate Adults and the Police and Criminal Evidence Act (PACE) (R4 & R11), and both national police and MPS guidance on strip-searching children (R6), addressing the stop and search guidance (R9).

Other recommendations focus on how the system works. There is a recommendation for the MPS Central East Basic Command Unit (BCU) around engagement with their local stop and search monitoring group (R7) and, the importance of referring children to, or seeking advice from, children's social care where there are concerns about substance misuse (R8). Four recommendations are addressed to the CHSCP. These are likely to have a wider relevance and transferability to other local areas. Three recommendations relate to professional development: ensuring that Child Q and the review is referenced with a specific focus on reinforcing the responsibilities of practitioners to advocate for and on behalf of the children they are working with or who are in their care (R5), develop an awareness-raising programme across schools and colleges about stop and search activity by the police (R12) and, multi-agency 'adultification' training actively focusing on practitioners from school and the police (R13). Recommendation 14 relates to developing an anti-racist charter and practical guides that support the eradicating of racism, discrimination and injustice across its local safeguarding arrangements.

In April, Jim Gamble QPM, Independent Child Safeguarding Commissioner, wrote to all partners of the CHSCP inviting them to map their safeguarding arrangements in respect of the findings and recommendations set out in the review (see Appendix 2).

This report updates Members on the review process, and sets out the initial response and plans to address the recommendations from the City of London Police (CoLP) and City of London Schools, and Community and Children's Services.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. In 2020, Child Q, a Black female child of secondary school age, was subject to a strip-search by female police officers from the MPS.
2. The search, which involved the exposure of Child Q's intimate body parts, took place on school premises, without an appropriate adult present, and with the knowledge that Child Q was menstruating.
3. As a result, an LCSPR was initiated by the CHSCP. The report was published in March 2022.
4. [*Local Child Safeguarding Practice Review: Child Q*](#) (Appendix 1) concluded that Child Q should never have been strip-searched. The review found that there was an absence of a safeguarding-first approach to the practice of many of the professionals involved that day.
5. The review makes eight findings and 14 recommendations for practice improvement. It concluded that racism was 'likely an influencing factor' in the strip-search and that there was a high level of probability that practitioners were influenced by 'adultification' bias. This is where Black and Global Majority children are held to adult standards, but their white peers are less likely to be.
6. In April, Jim Gamble QPM, Independent Child Safeguarding Commissioner, wrote to all partners of the CHSCP inviting them to map their safeguarding arrangements in respect of the findings and recommendations set out in the review (Appendix 2).
7. This report sets out the initial response to the recommendations from the CoLP and City of London Schools, and Community and Children's Services.

The Purpose of the Local Child Safeguarding Practice Review (LCSPR)

8. The purpose of the LCSPR is to:

"identify improvements to be made to safeguard and promote the welfare of children. Learning is relevant locally, but it has a wider importance for all practitioners working with children and families and for the Government and policymakers. Understanding whether there are systemic issues, and whether and how policy and practice need to change, is critical to the system being dynamic and self-improving.

Reviews should seek to prevent or reduce the risk of recurrence of similar incidents. They are not conducted to hold individuals, organisations or agencies to account, as there are other processes for that purpose, including through employment law and disciplinary procedures, professional regulation and, in exceptional cases, criminal proceedings. These processes may be carried out alongside reviews or at a later stage.

Employers should consider whether any disciplinary action should be taken against practitioners whose conduct and/or practice falls below acceptable standards and

should refer to their regulatory body as appropriate.”

[Working Together 2018, Chapter 4, page 8](#)

9. The [Child Safeguarding Practice Review Panel](#) (CSPRP) is a national body, not a local one. It is an independent panel responsible for commissioning national reviews of serious child safeguarding cases.
10. When a serious incident becomes known to the safeguarding partners (the Council, the Police and the Clinical Commissioning Group), they must consider whether the case meets the criteria for a local review. This is done through a process known as a Rapid Review.
11. The outcome of the Rapid Review is subsequently submitted to the CSPRP. In Child Q’s case, this was done on 15 January 2021. The delegated decision to instigate the review was made by the CHSCP’s Independent Child Safeguarding Commissioner (ICSC) and ratified by safeguarding partners in line with the CHSCP’s written safeguarding arrangements.
12. The CSPRP met on 26 January 2021 and wrote to the CHSCP on 2 February 2021. Its response is covered in paragraphs 1.7-1.10 of the report of the Review.

The Timeline of the Review

13. The [statement](#) from Jim Gamble QPM, Independent Child Safeguarding Commissioner, provides an overview of the timeline of the review:
 - **11 January 2021:** Child Q first came to the attention of the Independent Child Safeguarding Commissioner and a Rapid Review meeting was convened two days later.
 - **15 January 2021:** The Rapid Review report and the decision to instigate the LCSPR was submitted, as required by statutory guidance, to the CSPRP.
 - **26 January 2021:** The National CSPRP considered the case on 26 January 2021 and responded on 2 February 2021. This response stated: “We noted your decision to carry out a local child safeguarding practice review (LCSPR) but would encourage you to think carefully about whether one is necessary as we felt that this case was not notifiable and did not meet the criteria for an LCSPR.” Despite this suggestion, an LCSPR was initiated and work began at pace.
 - **February–March 2021:** Lead authors were confirmed, a reference panel identified, and a forward plan of key interviews developed. The CHSCP was mindful of the impact on Child Q and, while the family were quickly notified of the review, it was right not to interrupt the immediate support services being provided.
 - **By mid-April 2021:** The review completed interviews with Child Q, her family and the school teachers.

- **May 2021:** The headteacher and Local Authority Designated Officer were interviewed.
- Over the next three months, the review continued to press the MPS for access to the officers involved, or at the very least, their statements. Due to the nature and range of complaints, the Independent Office for Police Conduct (IOPC) had become formally involved.
- **6 July 2021:** The ICSC wrote to the Director General of the IOPC, explaining the situation and asking if he could reconcile the issue of access. The CHSCP was made an 'Interested Party' to the IOPC investigation. This allowed for the lawful sharing of relevant information, which was received in October 2021.
- While eventually resolved, the difficulties encountered in obtaining information from the police was the reason for the review making its first recommendation for the National Child Safeguarding Practice Review Panel and the IOPC.
- Work followed, and advice from the reference panel, research and data allowed for findings and recommendations to be focused and developed.
- **From January 2022:** Fact-checking and final rounds of engagement were carried out, including with the family (and their solicitor), the reference group, the MPS and the IOPC.
- **March 2022:** The review was published.

City of London Police (CoLP)

14. Following the March 2022 publication of *Local Child Safeguarding Practice Review: Child Q*, the CoLP conducted its own internal review of juvenile strip-searches. A senior member of the Professional Standards Directorate conducted a detailed review of all juvenile strip-searches undertaken during the last three years.
15. In the period March 2019 to March 2022 there were nine strip-searches of juveniles undertaken by CoLP officers. The juveniles were all male and aged between 15–17 years old. Three searches were as a result of a further search conducted under Code A PACE 1984. All others were conducted within the custody suite after detention and were authorised post-arrest. Seven of the strip-searches led to a positive outcome (a prohibited item being found).
16. A full report was completed for review by the Assistant Commissioner Betts who is strategic lead for this portfolio. The report will be considered by the City of London Police Renewing and Rebuilding Trust and Confidence Board (chaired by Assistant Commissioner Betts) which will oversee a number of identified learning points. The Board next convenes on 19 May 2022. This will include the consideration of all the recommendations relevant to the police from the *Local Child Safeguarding Practice Review: Child Q* report.

17. A detailed communication has been compiled and made available to all officers to remind them of their powers and the key considerations when undertaking searches, particularly those that are more intimate in their nature, and also those where juveniles are being searched. It details the relevant legislation and provides guidance on process and recording to ensure that all officers comply with the requirements of the Police and Criminal Evidence Act 1984 and Force policies. The communication also discusses 'adultification' and safeguarding considerations that officers must bear in mind. It sets out clear expectations relating to safeguarding and available resources within the Force to support officers in their decision making. This communication has also been sent to all Directorate Heads to disseminate to all Inspectors to ensure that teams receive briefings from their supervisors on this matter.
18. The CoLP review identified changes to the inputting of data to improve our record keeping and audit trail of rationale for relevant decisions. These have been allocated to appropriate leads in the Force to implement.
19. The CoLP has several internal and external working groups providing oversight and scrutiny to stop and search and strip-searches. These include:
 - Professional Standards and Integrity Committee of the Police Authority Board. As part of its remit, this Committee reviews data relating to stop and search and use of force. The committee scrutinises trends and findings and provides feedback, challenge, and asks for further information where required to allow them to intrusively oversee the use of the tactic by the Force. Every Committee Member was given the opportunity to patrol with a uniformed officer from the Local Policing team to witness a stop and search being conducted so that they could better understand the process.
 - Independent Advisory and Scrutiny Group. This group considers the details of individual stop searches and whether there was a lawful reason for the stop, and whether the grounds for the stop were justified. They can view Body Worn Video to better assess the search. They 'dip sample' 10% of searches monthly and also look at trends quarterly. Relevant training was provided to all members to assist them in reviewing stop searches.
 - At an operational level within the Force, line managers provide significant scrutiny. First line supervisors reviews every stop and search record. Additionally a structured dip sampling process requires every level of supervisor completes a review of a minimum number or percentage of searches each month.
 - Statistics on stop and search are presented to the quarterly City of London Police Stop and Search Working Group where they are reviewed against set criteria such as the disproportionality index, positive outcomes and grounds given for the search.

- The HMICFRS conducts reviews of stop searches carried out by the Force. The previous dip sample review established that 92% of searches had acceptable grounds. This placed the Force in the top six forces in England.
- The Force has committed to reviewing all strip-searches of juveniles quarterly. This will be conducted by the Senior Force Leads for stop and search, and custody management.

City Of London Schools and Community and Children’s Services

20. The City of London Corporation has one maintained primary school – The Aldgate School – and 10 sponsored academies as part of the City of London Academies Trust. It also supports three independent schools.
21. In its pursuit of educational excellence, the City Corporation has drawn these schools together, collectively known as 'the City of London Family of Schools'.
22. In addition to the 'Family of Schools', there are two schools and one college located in the City of London – St Paul's Cathedral School, Charterhouse Square School, and David Game College.
23. As noted above in paragraph 6 of this report, Jim Gamble QPM, Independent Child Safeguarding Commissioner, wrote to all Partners of the CHSCP in April inviting them to map their safeguarding arrangements in respect of the findings and recommendations set out in the review (see Appendix 2). This went to all CHSCP schools across Hackney and the City of London and was forwarded to all schools in 'The Family of Schools'.
24. Schools physically based in the City of London operate under the CHSCP governance arrangements. These schools meet on a termly basis as part of the City of London Safeguarding Education Forum – this is hosted by Community and Children’s Services, chaired by the Assistant Director, People, and includes attendance from the City schools’ Designated Safeguarding Leads, as well as officers from Community and Children’s Services, and the Lead Advisor for Safeguarding from the CHSCP.
25. City of London Education Trust schools (Family of Schools) , based in other local authority areas, will operate under their own local authority area Safeguarding Partnership arrangements. However, to provide opportunities to strengthen safeguarding arrangements across the CoL education footprint, the Family of Schools are invited to attend the City of London Safeguarding Education Forum.
26. The next Safeguarding Education Forum in June will be dedicated to reviewing the learning and development requirements for all schools linked to the findings of the report.
27. A more detailed report on the Family of Schools response to Child Q will be presented to the Education Board in June.

28. The following points illustrate some of the actions that the schools have engaged in (or will engage in), in response to the review findings:

- The Aldgate School leadership have reviewed the report and shared learning with senior leaders.
- Significant work has been undertaken by The Aldgate School in relation to anti-racism, safeguarding, and the curriculum.
- Across the Family of Schools, senior leaders have read and shared the report with their leadership teams.
- Reminders have been sent to senior leaders and all staff regarding search policies within schools.
- The review findings have been shared in assemblies with all year groups.
- Staff briefings have been undertaken regarding the case of Child Q.
- Some schools have confirmed that they have written to parents to offer reassurance and an opportunity for further conversations.
- Schools have reviewed the current practice around serious child safeguarding cases in their school in light of the Child Q report.
- Schools have initiated reviews of their current practice and state that they will continue to work with the local Safeguarding Partnership as required.
- Schools noted that they continue to ensure that they use appropriate systems to record all types of police searches.
- Where relevant, schools note that they will continue to liaise with their Safer School Police Officer to ensure that their policy and practice-based systems are up to date.
- Schools will ensure that they include specific items relating to 'adultification' in future training, and explore whole-school activities relating to this topic.
- One school noted that their Senior Leadership Team had reviewed the Child Q report, and the Designated Safeguarding Lead (DSL) led a whole-staff briefing and disseminated a PowerPoint presentation to every class, so they are aware of their rights. The safeguarding team also dropped in to each class to take any questions.
- The DSL and Deputy met with the Student Council on 25 April 2022 to discuss their views on Child Q and what steps to take to reassure Council members.

29. In addition to the schools, colleagues in Community and Children's Services have also engaged in activities following the publication of the review, including:

- Across Community and Children's Services, Senior Leaders have attended a CHSCP-commissioned 'adultification' learning and development session in June 2021.
- There is an expectation that all frontline staff will attend CHSCP-commissioned training regarding 'adultification' in the coming year.

- Reflective briefing sessions took place with staff in the People Directorate following the publication of the report. These were chaired by the Children Social Care Systemic Therapist and provided a safe and supportive environment for staff to consider the findings of the review, and help reflect on and process the difficult messages related to adultification, gender and race.
- Over the last 18 months, staff in the People Directorate and Community and Children’s Services have been engaged in anti-racism development work. This has included: running systemic group-based reflective sessions; action learning sets; establishing a book club for staff that provided the opportunity to work through the book *Me and White Supremacy* by Layla Saad over 25 weeks; our Independent Reviewing Service provided a video message for our children in care and care leavers providing information on how they can receive support from CoL on any issues that are impacting them directly; and managers presented our anti-racism work to the DfE.
- The CoL Multi Agency Child Exploitation (MACE) group, jointly chaired by Children’s Social Care and the CoL Police, reviewed the findings from the report at the April meeting. The implementation of the recommendations by partner agencies will be reviewed via the MACE group to help strengthen safeguarding arrangements specific to child sexual and criminal exploitation.
- Finally, the CHSCP has extended an invitation to all CoL Safeguarding Partners, including CoL schools, to attend the three-day Hackney Anti-racism conference in May 2022.

Corporate & Strategic Implications

30. Financial implications – there are no financial implications regarding this report. Future training, learning and development activity will be financed within service budgets.
31. Resource implications – as stated above.
32. Legal implications – no legal implications specific to this report.
33. Risk implications – implementation of learning from the recommendations will be reviewed as part of the CHSCP governance arrangements. Any concerns regarding compliance will be escalated through this mechanism.
34. Equalities implications – this report has raised issues in respect of the need to review and ensure effective anti-racist policy and practice is in place across partner agencies. CoLP and CoL schools will be addressing equalities issues and learning from this case as part of their action planning.
35. Climate implications – no climate implications specific to this report.
36. Security implications – no security implications specific to this report.

Conclusion

37. Following the strip-search by MPS officers of Child Q in a Hackney school in 2020, an LCSPR was initiated by the CHSCP. The report was published in March 2022.
38. [The review – Local Child Safeguarding Practice Review: Child Q](#) – concluded that Child Q should never have been strip-searched. The review found that there was an absence of a safeguarding-first approach to the practice of many of the professionals involved that day.
39. The report also concluded that racism was ‘likely an influencing factor’ in the strip-search and that there was a high level of probability that practitioners were influenced by ‘adultification’ bias. The review made eight findings and 14 recommendations for practice.
40. CoLP and City of London Schools have carried out a range of activities to understand and share learning with colleagues from the review.
41. This report has highlighted activity to date and the plans for future learning.

Appendices

- Appendix 1 – *Local Child Safeguarding Practice Review: Child Q - March 2022*
- Appendix 2 – Mapping Recommendations Template

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Local Child Safeguarding Practice Review

Child Q

March 2022

Jim Gamble QPM, Independent Child Safeguarding Commissioner

Rory McCallum, Senior Professional Advisor

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1. Introduction

- 1.1 In 2020, Child Q, a Black female child of secondary school age, was strip searched by female police officers from the Metropolitan Police Service (MPS). The search, which involved the exposure of Child Q's intimate body parts, took place on school premises, without an Appropriate Adult present and with the knowledge that Child Q was menstruating.
- 1.2 Teachers told the review that on the day of the search they believed Child Q was smelling strongly of cannabis and suspected that she might be carrying drugs. On questioning Child Q, she denied using or having any drugs in her possession. A search of her bag, blazer, scarf, and shoes revealed nothing of significance.
- 1.3 Remaining concerned, teachers sought advice from the Safer Schools Police Officer. Due to the restrictions arising from Covid-19, this officer was not on site. He recommended that the school call 101 and ask for a female officer to attend.
- 1.4 A male and female officer subsequently arrived at the school, followed by another two officers (one of whom was also female). After discussions between the police and teachers, Child Q was escorted to the medical room. She was subsequently strip searched.
- 1.5 No Appropriate Adult was in attendance, teachers remained outside the room and Child Q's mother was not contacted in advance. No drugs were found during either the strip search or a search of the room in which Child Q had been waiting beforehand.
- 1.6 Child Q was later allowed to return home where she disclosed the events to her mother. Child Q described how she had been strip searched whilst menstruating. Due to the level of her distress, Child Q's mother took her to the

family GP who made a referral for psychological support. This led to contact with Hackney Children and Families Services (Hackney CFS).

- 1.7 Given these circumstances, a Rapid Review was initiated by the City & Hackney Safeguarding Children Partnership (CHSCP). The Rapid Review report was submitted to the Child Safeguarding Practice Review Panel¹ (*the Panel*) in early 2021. As part of its response, the Panel made the following suggestion.

'We noted your decision to carry out a local child safeguarding practice review (LCSPR) but would encourage you to think carefully about whether one is necessary as we felt that this case was not notifiable and did not meet the criteria for an LCSPR.'

- 1.8 Despite this suggestion, a Local Child Safeguarding Practice Review (*the review*) was nonetheless initiated. The delegated decision to do this was made by the CHSCP's Independent Child Safeguarding Commissioner (ICSC) and ratified by safeguarding partners in line with the CHSCP's written safeguarding arrangements.

- 1.9 In considering the relevant statutory guidance², the overwhelming opinion was that Child Q had been exposed to a traumatic incident and had undoubtedly suffered harm. Whilst there was less certainty about whether the precise definition of a '*serious child safeguarding case*' had been met, there was little doubt that the impact on Child Q had been profound. The repercussions on Child Q's emotional health were obvious and ongoing. Given the context of where and how the search took place, it was impossible not to view these circumstances as anything other than the most serious and significant.

- 1.10 The incident also illustrated unambiguous issues of importance that warranted independent analysis, not least the potential impact of disproportionality and racism and how these factors might have influenced the actions of organisations and individual professionals.

¹ <https://www.gov.uk/government/organisations/child-safeguarding-practice-review-panel/about>

² Working Together 2018, Chapter 4 para 15-19

1.11 Indeed, reinforcing the gravity with which this case was being viewed, Ofsted's National Director for Social Care and Regional Director for London were engaged by the CHSCP and verbally appraised of its details.

1.12 Terms of Reference were set for the review, with the methodology requiring the following questions to be addressed:

- Was the rationale and practice to strip search Child Q sufficiently attuned to the rights of children as set out in the relevant articles of the United Nations Convention on the Rights of the Child?
- Was practice involving Child Q sufficiently focused on her potential safeguarding needs?
- Is the law and policy, which informs local practice, properly defined in the context of identifying potential risk and furthermore, does law and policy create the conditions whereby practice itself can criminalise and cause significant harm to children?

1.13 To ensure the review had access to relevant expertise, a reference panel including Black and Global Majority Ethnic³ safeguarding professionals was also convened. Their input has been invaluable in helping to explore and validate the review's findings in the context of anti-racist practice.

1.14 These and other findings are consistent with the overall purpose of reviews. In line with statutory guidance, they are focused upon preventing or reducing the risk of recurrence of similar incidents. The review has not been *'conducted to hold individuals, organisations or agencies to account, as there are other processes for that purpose, including through employment law and disciplinary procedures, professional regulation and, in exceptional cases, criminal proceedings.'*⁴

1.15 With regards to the above, following a formal complaint, Child Q's school swiftly responded to this by way of a Stage 2 investigation. Investigations remain

³ This terminology is used in place of Black and Minority Ethnic (BAME).

⁴ [Working Together to Safeguard Children 2018, Chapter 4, para 4.](#)

ongoing by the Independent Officer for Police Conduct (IOPC) into the conduct of the police officers.

- 1.16 The review makes eight findings and 14 recommendations for improving practice.

Finding 1: The school was fully compliant with expected practice standards when responding to its concerns about Child Q smelling of cannabis and its subsequent search of Child Q's coat, bag, scarf and shoes. This demonstrated good curiosity by involved staff and an alertness to potential indicators of risk.

Finding 2: The decision to strip search Child Q was insufficiently attuned to her best interests or right to privacy.

Finding 3: School staff deferred to the authority of the police on their arrival at school. They should have been more challenging to the police, seeking clarity about the actions they intended to take. All practitioners need to be mindful of their duties to uphold the best interests of children.

Finding 4: School staff had an insufficient focus on the safeguarding needs of Child Q when responding to concerns about suspected drug use.

Finding 5: The application of the law and policy governing the strip searching of children can be variable and open to interpretation.

Finding 6: The absence of any specific requirement to seek parental consent when strip searching children undermines the principles of parental responsibility and partnership working with parents to safeguard children.

Finding 7: The Covid-19 restrictions in place at the time appeared to have frustrated effective communication between school staff and the Safer Schools Officer.

Finding 8: Having considered the context of the incident, the views of those engaged in the review and the impact felt by Child Q and her family, racism (whether deliberate or not) was likely to have been an influencing factor in the decision to undertake a strip search.

2. Background and Context

- 2.1 Beyond the immediate events of the strip search at school, the review has kept information relating to the background and context of Child Q's lived experience to a minimum. The reasons for this are three-fold. Firstly, to protect Child Q's identity and that of her family, secondly, to allow for the report's publication and thirdly, because the review considers much of this information to be largely irrelevant.
- 2.2 To explain this latter point further, the review has been mindful not to detract from the incident itself. It has also been careful not to introduce a perception that there might be a 'rationale' to excuse the actions of some professionals based on who Child Q is, where she lives or what her family circumstances are.
- 2.3 The review is clear that the strip search of Child Q should never have happened and there was no reasonable justification for it.

Definitions

- 2.4 A 'strip search' is a specific practice related to the overall stop and search powers available to the police. There are two distinct types of strip search that are outlined under the Police and Criminal Evidence Act (PACE) 1984.

More Thorough Searches

- 2.5 A more thorough search, as part of a stop and search, is where an officer deems it necessary that the subject removes more than an outer coat, jacket or gloves. This process does not reveal intimate parts of the body. Powers for this more thorough search are set out under PACE Code A, [paragraph 3.6](#).

‘Where on reasonable grounds it is considered necessary to conduct a more thorough search (e.g. by requiring a person to take off a T-shirt), this must be done out of public view, for example, in a police van unless paragraph 3.7 applies, or police station if there is one nearby.

Any search involving the removal of more than an outer coat, jacket, gloves, headgear or footwear, or any other item concealing identity, may only be made by an officer of the same sex as the person searched and may not be made in the presence of anyone of the opposite sex unless the person being searched specifically requests it.’

Searches Involving Exposure of Intimate Parts of the Body

- 2.6 Searches involving exposure of intimate parts of the body are where the person removes all or most of their clothing. They are, by definition, one of the most intrusive forms of search. As with searches involving less intrusion, they must only be used where it is necessary and reasonable, bearing in mind the object of the search.
- 2.7 Consultation with a supervisor is always required prior to such a search⁵. The police officer must be of the same sex as the person being searched and the process must be conducted in accordance with [paragraph 11](#) of PACE Code C, Annex A. Full powers are set out under [PACE Code A, paragraph 3.7](#).

‘Searches involving exposure of intimate parts of the body must not be conducted as a routine extension of a less thorough search, simply because nothing is found in the course of the initial search.

⁵ [College of Policing – Authorised Professional Practice](#)

Searches involving exposure of intimate parts of the body may be carried out only at a nearby police station or other nearby location which is out of public view (but not a police vehicle).

- 2.8 During a search involving the exposure of intimate parts of the body, persons are required to remove some or potentially all of their clothing. They can also be required to bend over and spread their legs. The police are allowed to require compliance in this regard if the person is suspected of concealing evidence. This might include, for example, class A drugs or an object that could cause harm. Child Q was searched under this criterion.

Intimate Searches

- 2.9 In addition to these defined 'strip searches', the police can also undertake 'intimate searches'. These involve a physical examination of a person's body orifices other than the mouth. PACE identifies that '*the intrusive nature of such searches means the actual and potential risks associated with intimate searches must never be underestimated*'. It further sets out the specific approach to consent that must be followed prior to any such search being undertaken.

The Day of the Incident

- 2.10 In trying to determine why the events unfolded as they did, inconsistencies in the accounts of those involved have hampered the review's ability to clarify these details with any precision. These variations primarily relate to the initial conversations held between the police and the school, whether school staff knew that Child Q was going to be searched (and to what extent) and who was acting as an Appropriate Adult.
- 2.11 Whilst taking account of interviews and written statements, the review does not draw any firm conclusions about each event in question. Some remain subject to investigation as part of ongoing complaints. That said, the review believes it reasonable to infer the following:

- School staff contacted the police because they remained concerned that Child Q had drugs in her possession. They had searched Child Q to the extent that was permissible, and it is likely they knew a further search of Child Q would be undertaken by the attending officers.
- Indeed, if a potential search wasn't expected, then the instruction for a member of staff to follow Child Q when being taken to another office is unlikely to have been made. This was done to make sure that Child Q didn't attempt to dispose of anything in her possession.
- It is unlikely that the school was informed by the attending police officers of the intention to strip search Child Q.
- It is likely that the importance of the Appropriate Adult role was insufficiently explained to either Child Q or the school staff present. Relevant requirements set out under para 11, Annexe A, Code C of the Police and Criminal Evidence Act 1984 (PACE) appear not to have been followed.
- There is no evidence that the officers consulted with a supervisor prior to the search.
- There is no evidence that Child Q was resistant to the search undertaken by school staff or that there were any indicators in her behaviour that she might be hiding drugs on her person.
- The rationale used by the police to initiate the strip search was primarily based on reports provided by the school – that she had smelt of cannabis, that she had previously smelt of cannabis at school and that someone known to Child Q had previously been excluded for drugs.

Previous Incidents of Concern

2.12 A month before Child Q was strip searched, she was similarly identified by the school as smelling of cannabis. On this occasion Child Q was described by school staff as being 'intoxicated', although on contacting her mother, she explained that Child Q had been studying late the night before and it was this that accounted for her presentation. Such background is relevant to the review given the different approach adopted by the school in managing this earlier

incident (and the likely influence of this event on the actions prior to Child Q being strip searched).

- 2.13 In the school's record log, it is noted that Child Q and her mother were advised that *'if this behaviour continues or that if she is found with weed/drugs on her she will not be able to continue her place with [the school].'* No further action followed by way of exploring this incident further, contacting the police or engaging external agencies for advice and support. Child Q's mother was, however, quickly engaged by school staff to inform her of the concerns.

The School Context

- 2.14 The most recent inspection of Child Q's school found it to be good with safeguarding effective. There are no known complaints regarding pupil well-being or the overall provision for pupils prior to the incident involving Child Q.
- 2.15 There have never been any similar incidents whereby a child has been strip searched on the school's premises. The review is not alert to any other child having been strip searched in any other local school.
- 2.16 In the school's Stage 2 investigation report, its author commented: *'The involvement of the police in this manner is an irregular occurrence at the Academy. In the 12 months prior to the incident the Academy had not requested police involvement about searches or suspicion of possession of banned/illegal items for students.'*

Local Facts & Figures

- 2.17 During 2020/2021, there were 299 *'further searches'* conducted in Hackney by local police officers from the Central East BCU of the MPS. The review was advised that *'further searches'* is the terminology used to cover strip search activity, although this does not differentiate between the specific types of searches that can be undertaken.

2.18 Over the same period, 25 children under the age of 18 were subject of 'further searches'. 19 were male and 18 were handcuffed during the process. The reasons for search primarily related to suspicions about drugs (20), followed by weapons (4) and stolen property (1). 22 (88%) of the searches were negative with an outcome of no further action recorded in 20 (80%) of the cases. In terms of ethnicity, (as per the codes used by the police), 15 (60%) of the children searched were Black, 2 were White, 6 Asian and 2 Arab or North African.

3. Views of Child Q

3.1 During her engagement with the review, Child Q was spoken to and shared a written account of her experiences. The following statements made by Child Q reflect the significant impact that this incident had upon her.

"Someone walked into the school, where I was supposed to feel safe, took me away from the people who were supposed to protect me and stripped me naked, while on my period."

"...On the top of preparing for the most important exams of my life. I can't go a single day without wanting to scream, shout, cry or just give up."

"I feel like I'm locked in a box, and no one can see or cares that I just want to go back to feeling safe again, my box is collapsing around me, and no-one wants to help."

"I don't know if I'm going to feel normal again. I don't know how long it will take to repair my box. But I do know this can't happen to anyone, ever again."

"All the people that allowed this to happen need to be held responsible. I was held responsible for a smell."

“...But I’m just a child. The main thing I need is space and time to understand what has happened to me and exactly how I feel about it and getting past this exam season.”

“..... I need to know that the people who have done this to me can't do it to anyone else ever again. In fact so NO ONE else can do this to any other child in their care.”

“Things need to change with all organisations involved. Even I can see that.”

4. Views of Mother and Maternal Aunt

4.1 Child Q’s mother and maternal aunt were also engaged by the review. During interviews, there was a clear sense of shock as to what Child Q had experienced and the ongoing impact upon the whole family. The events themselves have dented the family’s confidence and trust in those professionals tasked with caring for and protecting Child Q.

4.2 There was also an overwhelming perception by the family that Child Q had been let down badly, criminalised, and above all, a view that Child Q was treated differently because she is Black. A sample of their views reflecting the impact of the strip-search are set out below.

4.3 Comments from Child Q’s mother during interview.

“...the incident that happened (was) treated not as a safeguarding issue. (It was) treated as a criminal matter.”

“(Professionals) treated her as an adult. (She was) searched as an adult.”

“Child Q is a changed person. She is not eating, every time I find her, she is in the bath, full of water and sleeping in the bath. Not communicating with us as (she) used to, doesn’t want to leave her room, panic attacks at school, doesn’t

want to be on the road, screams when sees/hears the police, and we need to reassure her.”

“We try to get her to do things and reassure her. Child Q is not the same person. Was a person who liked to be active and get into things. Not now, she has changed. She comes home, goes upstairs in the bedroom and closes the bedroom door. Saying she is doing mock exam studies, she just locks off, saying leave me alone. When sleeping, (she is) screaming in her sleep, I have to watch her.”

“At the end of day, things like that happen, is it because of her skin, hair. Why her, now looking at the future, will she be comfortable?”

“Child Q was searched by the police and was asked to go back into the exam without any teacher asking her about how she felt knowing what she had just gone through. Their position in the school is being part of the safeguarding team, but they were not acting as if they were a part of that team. This makes me sick - the fact that my child had to take her sanitary towel off and put the same dirty towel back on because they would not allow her to use the restroom to clean herself. I was also wondering if the officers body cameras were on while my child was stripped of her clothes, are they re-watching it?”⁶

4.4 When questioned, the MPS informed the review that there is no Body Worn Camera recording of the incident.

4.5 Letter from Child Q’s mother to the review.

“Consider what is happening now diversity and racial equality around Black Lives Matter and what is happening to women out there.”

“Do you think it is appropriate for a black girl to be search without a parent or family member, when I send my child to school, I expect teachers to act as a

⁶ The MPS informed the review that there is no Body Worn Camera recording of the incident.

parental substitute. Would allow your child to be strip searched and questioned without consent or a guardian present, for a 15-year-old to be interrogated by multiple unnamed police officers.”

“Why doesn’t my daughter deserve the same rights as every other child, is this because they think she is a young girl, with no respect for her parents or adults and no fear of consequences or because she is a black child living in a poor city area.”

“As you can see clearly in the incident, they have already pointed out the area that Child Q lives in, they made where we live a boundary for Child Q. Our children have families, have names, have hearts and minds, their lives matter. They wish to be scientists, educators and mathematicians.”

4.6 Comments from Child Q’s maternal aunt made during interview.

“I see the change from a happy go lucky girl to a timid recluse that hardly speaks to me...In my personal opinion, they have got a problem with Child Q and the aftermath is that when she sees this individual (a teacher) in school, gets panic attacks. They are the main instigator of the exposure.”

4.7 Letter from Child Q’s maternal aunt to the review.

“I cannot express to you how aggrieved I am with the school and the police enforcement officers for exposing Child Q to such an undignified, humiliating, and degrading exposure. No child of her age should have to experience this without due cause.”

“Child Q was doing exceptionally well at school, top of the class and getting praised every day for her good work and good conduct. She was even the prefect of her year at one stage. She was progressing well, a happy go lucky child, well loved, and cared for. Then for whatever reason, cracks crept in and she appeared to be singled out by the teachers repeatedly for various things.”

“The family do not believe that the officers would have treated a Caucasian girl child who was on her monthly periods in the same way.”

- *“Child Q was made to take her pad off, something so personal and exposed in such a way to strangers.”*
- *“Child Q was racially profiled due to her being black and her extreme large head of locks.”*
- *“She was made to bend over spread her legs, use her hands to spread her buttocks cheek whilst coughing.”*
- *“She was not permitted to use the toilet despite asking.”*
- *“She is now self-harming and requires therapy. She is traumatised and is now a shell of the bubbly child she was before this incident.”*
- *“From the time she was pulled out of her exam to the time she returned home, she was isolated, not given food or offered water, where is the care.”*
- *“It is now being circulated in her school that she is the big-time drugs seller.”*
- *“All the above is related to the police behaviour towards her.”*

5. Findings and Recommendations

5.1 It has been a relatively straightforward process for the review to conclude that Child Q should never have been strip searched. Across many of the professionals involved that day, there was an absence of a safeguarding first approach to their practice. There were other ways that this incident could and should have been managed, beyond the largely criminal justice response from the police and the disciplinary response from the school.

5.2 Whilst school staff were right to respond to their concerns, the intervention that followed is considered by the review to have been disproportionate and ultimately harmful to Child Q.

- 5.3 Prior to addressing each of the questions as set out in the Terms of Reference, the review makes two supplementary recommendations.
- 5.4 The first, not relating to the experiences of Child Q, involves the LCSPR process itself. This has been made given the significant difficulties experienced by the review team in gaining direct access to the police officers involved in the case.
- 5.5 This was due to their practice being subject to a formal investigation by the IOPC. Whilst eventually resolved through effective collaboration between the IOPC and the CHSCP⁷, the following recommendation is made.

Recommendation 1: The Child Safeguarding Practice Review Panel should engage the IOPC with a view to developing national guidance on the IOPC's interface with the Local Child Safeguarding Practice Review process. As a minimum, this should set out the arrangements for securing cooperation, accessing key staff for interview and the requirements for the timely sharing of information.

- 5.6 The second recommendation involves the data submitted to the review by the MPS in respect of strip searches. This lacked specificity on the different types of strip searches, demographics of those searched, locations and timing. The review was informed there was no existing mechanism to retrieve this data without significant operational tasking.

Recommendation 2: The MPS should review and revise its recording system for stop and search to ensure it clearly identifies and allows for retrieval of the full range of activity under stop and search powers (including the ability to differentiate between the different types of strip searches undertaken).

⁷ The CHSCP was designated a formal party to the IOPC investigation in order to facilitate a legal basis for information sharing. Whilst this allowed access to information provided to the IOPC as part of its investigation, none of the officers were engaged in face-to-face interviews.

Review Question 1: UNCRC Compliance

5.7 Was the rationale and practice to strip search Child Q sufficiently attuned to the rights of children as set out in the relevant articles of the United Nations Convention on the Rights of the Child?

5.8 The United Nations Convention on the Rights of the Child (UNCRC) is the most widely ratified international human rights treaty in history. *'The Convention has 54 articles that cover all aspects of a child's life and set out the civil, political, economic, social and cultural rights that all children everywhere are entitled to. It also explains how adults and governments must work together to make sure all children can enjoy all their rights.'*⁸

5.9 The European Convention on Human Rights (ECHR) is an international treaty, in which Member States of the Council of Europe, including the UK, commit to upholding a number of fundamental rights.

5.10 As part of the review's analysis, consideration has been given to the relevant articles under both conventions. Firstly, it has examined them in the context of the school's decision to search Child Q.

Finding 1: The school was fully compliant with expected practice standards when responding to its concerns about Child Q smelling of cannabis and its subsequent search of Child Q's coat, bag, scarf and shoes. This demonstrated good curiosity by involved staff and an alertness to potential indicators of risk.

5.11 The identified concerns about the smell of cannabis, the concern that this was a repeated incident and the additional context about someone known to Child Q⁹ all provided a rationale for the school to act. The school also held concerns that if Child Q did have drugs in her possession, then this could present a

⁸ <https://www.unicef.org.uk/what-we-do/un-convention-child-rights/>

⁹ A person known to Child Q had previously been excluded for drugs and there were concerns about this individual and gang affiliation.

potential risk to other pupils in the school. Given these circumstances, there were reasonable grounds for the school to be worried.

- 5.12 Under the UNCRC, the decision of the school to investigate further and conduct a search of Child Q's bag, scarf, coat and shoes reflects compliance with Article 33 (protecting children from the illegal use of drugs and from being involved in the production or distribution of drugs) and Article 3 (best interests).
- 5.13 Practice by the school at this point was also fully in line with its powers defined in government guidance¹⁰. This describes how school staff can search a pupil for any item if the pupil agrees, alongside setting out the statutory power to search pupils or their possessions, without consent, '*where they have reasonable grounds for suspecting that the pupil may have a prohibited item*'. Prohibited items include illegal drugs.
- 5.14 Actions taken by the school in searching Child Q demonstrated an adherence to obligations under Article 8 of the ECHR. Whilst this defines a pupil's right for respect to their private life, the 'interference' by way of the initial search was fully justified and proportionate.
- 5.15 Whilst evidencing positive practice, the next steps were characterised by a level of ambiguity and a diluted focus on Child Q's safeguarding needs. This is addressed later in the report.
- 5.16 Whilst no recommendations are made in respect of Child Q's experiences at this stage, the review has identified a need for the government's guidance, '*Searching, screening and confiscation - Advice for headteachers, school staff and governing bodies, DfE, January 2018*' to be updated. In the opinion of the review, this guidance could be strengthened by including much stronger reference to the primary need to safeguard children.

¹⁰ [Searching, screening and confiscation - Advice for headteachers, school staff and governing bodies, DfE, January 2018](#)

- 5.17 As framed, its tone is largely about discipline and is likely to lead front-line staff down this path of practice. By including relevant narrative about, for example, extra-familial risks and contextual safeguarding, this might help concentrate practice on helping and protecting children.
- 5.18 Indeed, the section covering what should happen after a search contains no reference to Keeping Children Safe in Education 2018 or the expectation that schools should escalate their concerns when indicators of abuse, harm or exploitation are identified. Being in possession of drugs is one such indicator, although the only external agency identified in the guidance for contact is the police.
- 5.19 The guidance also includes worryingly outdated terminology that should be urgently corrected. For example, on pages 12 and 13, the guidance refers to ‘*child pornography*’ and ‘*pornographic images of a child*’ respectively.

Recommendation 3: The Department for Education should review and revise its guidance on *Searching, Screening and Confiscation (2018)* to include more explicit reference to safeguarding and to amend its use of inappropriate language.

Finding 2: The decision to strip search Child Q was insufficiently attuned to her best interests or right to privacy.

- 5.20 There is valid critique about whether the decision and execution of the strip search were consistent with Child Q’s best interests¹¹ and her right to privacy¹².
- 5.21 An example of this can be seen in the approach to engaging an Appropriate Adult for Child Q. Practice was ambiguous and appears not to have aligned with the defined legal application of stop and search (concerning searches

¹¹ Article 3 (best interests of the child) The best interests of the child must be a top priority in all decisions and actions that affect children. UNCRC

¹² Article 16 (right to privacy) Every child has the right to privacy. The law should protect the child’s private, family and home life, including protecting children from unlawful attacks that harm their reputation. UNCRC

involving exposure of intimate parts of the body) as set out by the College of Policing¹³. This guidance states:

'Unless there is a risk of serious harm to the person or to someone else, there must be a minimum of two persons present in addition to the person being searched. One of those must be the appropriate adult if the person is a child or vulnerable adult unless, in the case of a child, the child and appropriate adult both agree that the adult should not be present during the search.'

- 5.22 In Child Q's circumstances, whilst two people were present, they were both police officers. In the account of one of these officers seen by the review, they comment that Child Q '*indicated*' that she didn't mind one of the teachers acting as an Appropriate Adult but was uncomfortable about them being in the room. The officer further states that this teacher (and another) '*seemed*' happy to be outside whilst the search was undertaken. 'Indicated' and 'Seemed' do not suggest a thorough process whereby specific clarification was being sought about how Child Q's best interests would be protected.
- 5.23 Indeed, school staff dispute having ever been told about the planned strip search. In this sense, even if they knew they were the Appropriate Adult for Child Q, their ability to effectively advocate for her was seriously undermined.
- 5.24 On initiating the review, the MPS quickly recognised this as an area of improvement, issuing a revised guidance note to its officers across London in February 2021. This reinforced the following requirements with regards to Appropriate Adults.
- *Arrange for an Appropriate Adult to be present in the case of a child or young person or vulnerable adult (except in cases of urgency where there is a risk of harm to the detainee or others).*

¹³ <https://www.app.college.police.uk/app-content/stop-and-search/legal/legal-application/>

- *If the subject is under 18 and does not wish an Appropriate Adult to be present during the actual search, ensure they explain this in the presence of the Appropriate Adult and obtain the agreement of the Appropriate Adult.*

5.25 Whilst positive, this guidance could be strengthened by fully reflecting the procedure set out under the revised Code C, PACE, Annex A, paragraph 11 (C)¹⁴.

'Except in urgent cases ... a search of a juvenile may take place in the absence of the appropriate adult only if the juvenile signifies in the presence of the appropriate adult that they do not want the adult to be present during the search and the adult agrees. A record shall be made of the juvenile's decision and signed by the appropriate adult.'

5.26 No evidence has been seen by the review indicating that any of the above expectations were actioned by the police during the strip search of Child Q. The review makes the following recommendation:

Recommendation 4: The MPS should update its guidance note and local policy to better emphasise the requirements for engaging an Appropriate Adult under the revised Code C, PACE, 1984.

5.27 In terms of the wider responsibility of all practitioners to protect and promote the rights of children, the review makes the following finding:

Finding 3: School staff deferred to the authority of the police on their arrival at school. They should have been more challenging to the police, seeking clarity about the actions they intended to take. All practitioners need to be mindful of their duties to uphold the best interests of children.

¹⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/117589/pace-code-c-2012.pdf

- 5.28 As a learning point, this has been fully accepted by the school staff involved. Many reflected their sadness and disappointment at what Child Q had experienced, with comments made as part of the school's Stage 2 investigation report echoing these feelings:

"In hindsight I put my trust in the law; I know now that I need to understand the law better... For example, insisting on staying with a student at all times..."

"This is the hardest thing that we've had to go through and for anyone to think that the school might be complicit is very stressful and difficult to deal with."

"In my experience with police [at her previous schools], where there has been a suspicion of carrying drugs or a weapon, and police found it necessary to conduct a search, it would only be a 'pat down'. I have known drugs to be found in socks or a waistband as I had witnessed that before, twice in my career. I have never known any more than that on site or known a student to be taken off site."

"I am an experienced Designated Safeguarding Lead with over 6 years' experience of safeguarding and liaising with the police to support young people. I have never known, nor would I condone a strip search of a young person on a school site."

<p>Recommendation 5: The CHSCP should review and revise its awareness raising and training content to ensure the Child Q case is referenced, with a specific focus on reinforcing the responsibilities of practitioners to advocate for and on behalf of the children they are working with / who are in their care.</p>

Review Question 2: Safeguarding Needs

- 5.29 Was practice involving Child Q sufficiently focused on her potential safeguarding needs? In circumstances where young people are being engaged due to concerns about drug use / possession, is the safeguarding of children a recognised and evidenced priority in practice?

- 5.30 Concerns about strip searching children are not new, having previously attracted scrutiny from a range of different sources. Whilst not practical to highlight every relevant article or document, the following provides a snapshot of some of this material.
- 5.31 In 2014, a report by Joe Sandler Clarke¹⁵ for the Guardian newspaper identified that *'...4,638 children aged between 10 and 16 were asked to remove their clothes and then searched by police between April 2008 and the end of last year. Just over a third were released by police without charge.'*
- 5.32 This article also highlighted the attempts of Julian Huppert, a Liberal Democrat MP for Cambridge who unsuccessfully campaigned for children to be strip searched only if an adult other than police officers was present.
- 5.33 In 2015, Just for Kids Law and Children's Rights Alliance for England (CRAE) published a briefing note¹⁶ detailing their serious concerns about an *'alarming increase in the number of children being strip searched by the police'*. This note also highlighted concerns that in 45% of strip searches of children, no Appropriate Adult was present.
- 5.34 More recently, the practice of strip searching within the CHSCP's footprint has also been critiqued. Whilst involving an adult, the case of Dr Koshka Duff¹⁷ evidences the impact and trauma that can be caused when practice falls well outside of defined standards.
- 5.35 Whilst some may argue that the strip searching of children should never be done at all, the review acknowledges its place in practice, with the caveat that this needs to be firmly embedded in a culture that addresses the safeguarding needs of children.

¹⁵[Metropolitan police strip searched more than 4,500 children in five years](#), Joe Sandler Clarke, The Guardian, March 2014

¹⁶<http://www.crae.org.uk/media/76504/FINAL-Strip-Searching-at-Police-Station-Briefing.pdf>

¹⁷<https://www.bbc.co.uk/news/uk-60141559>

- 5.36 The senior leaders at both the school and the police have fully acknowledged they could and should have done better in this regard. It is accurate to describe the senior leadership teams as being appalled at what Child Q experienced.
- 5.37 If children are suspected of carrying drugs or weapons, it is more likely than not that they are being exploited in some way or form. So, whilst stop and search powers '*enable officers to allay or confirm suspicions about individuals without exercising their power of arrest.*'¹⁸ – they should equally be used as a tool to identify risk and give children the help and protection they might need.
- 5.38 Taking a binary approach as to whether a crime has been committed or not runs the risk that important aspects of a child's life will be missed. Important aspects that may make the difference between that child being protected or not.
- 5.39 In terms of the strip search of Child Q, practice that day appears to have been far too weighted towards a criminal justice response. This may be explained in part by the deference of school staff to the police. It might relate to the relative junior police staff involved or the fact that officers didn't seek the advice of their supervisor. It might also relate to elements of disproportionality and racism leading those involved to make certain assumptions about Child Q and what response was required.
- 5.40 It was also the lack of action taken after the strip search that shows Child Q was primarily being seen as 'the risk' as opposed to being 'at risk'. Because of this, little to no thought was given as to whether a referral to external agencies might be required. Indeed, if the rationale to strip search Child Q was based on fears about exploitation, then it should have followed that this concern was escalated as a safeguarding referral¹⁹. As it was, Child Q was sent home in a taxi.

¹⁸ [Revised code of practice for the exercise by: Police Officers of Statutory Powers of stop and search, Home Office 2014](#)

¹⁹ The MPS did create a Merlin report, however, this was RAG rated as BLUE. These are not ordinarily submitted to Hackney CFS as risk is assessed as not being a factor. The Merlin was received by Hackney CFS 14 days later as part of a request for information from the police following the referral from Health. The Merlin made no reference to the strip search.

Recommendation 6: Relevant police guidance (both local and national) governing the policy on strip searching children should clearly define a need to focus on the safeguarding needs of children and follow up actions that need to be considered by way of helping and protecting children at potential risk.

Recommendation 7: The Central East BCU should engage the local stop and search monitoring group, ACCOUNT, and other representative bodies to consider the lessons from this review and how the effectiveness of safeguarding (as part of stop and search practice) can be overseen through their respective activities.

Finding 4: School staff had an insufficient focus on the safeguarding needs of Child Q when responding to concerns about suspected drug use.

- 5.41 When evaluating practice by the school, lessons also emerge about the need to maintain a clear line of sight on the safeguarding needs of children. Neither the incident of the strip search nor the previous concerns about Child Q smelling of cannabis resulted in any contact with external agencies.
- 5.42 Practice during both these incidents was similarly binary in approach, with the focus appearing to be on whether Child Q had breached the rules as opposed to what the alleged substance misuse might mean for her safety and welfare. The review makes the following finding in this respect:

Recommendation 8: Where any suspicion of harm arises by way of concerns for potential or actual substance misuse, a safeguarding response is paramount. Practitioners should always contact Children’s Social Care to make a referral or seek further advice in such circumstances.

Review Question 3: Law and Policy

- 5.43 Is the law and policy, which informs local practice, properly defined in the context of identifying potential risk and furthermore, does law and policy create the conditions whereby practice itself can criminalise and cause significant harm to children?

Finding 5: The application of the law and policy governing the strip searching of children can be variable and open to interpretation.

- 5.44 Home Office guidance²⁰ explains that the use of powers relating to stop and search ‘*must be used fairly, responsibly, with respect for people being searched and without unlawful discrimination*’. Under the Equality Act 2010, section 149, officers also have ‘*a duty to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, to advance equality of opportunity between people who share a ‘relevant protected characteristic’ and people who do not share it, and to take steps to foster good relations between those persons.*’ It further emphasises section 11 of the Children Act 2004 that requires chief police officers and other specified persons and bodies ‘*to ensure that in the discharge of their functions they have regard to the need to safeguard and promote the welfare of all persons under the age of 18.*’
- 5.45 The Home Office policy framework also acknowledges that if the fundamental principles (governing the discharge of stop and search powers) are not observed, the use of powers to stop and search ‘*may be drawn into question*’. For any search undertaken by the police, the guidance is clear that it must be based on reasonable grounds for suspicion that the person has a particular article in their possession²¹.
- 5.46 Whilst there is no disagreement with many aspects of this guidance or the broad principles of the law, it is here that the review believes further emphasis could help support improved practice with children.

²⁰ [Revised code of practice for the exercise by: Police Officers of Statutory Powers of stop and search, Home Office 2014](#)

²¹ Except when officers are authorised under section 60 Criminal Justice and Public Order Act 1994.

- 5.47 Indeed, with regards to Child Q’s experiences, having a previous associate who used drugs and being noted to have smelt of cannabis twice, should not have led an officer to conclude a strip search on school grounds was the right course of action. This and subsequent actions did not have regard to Child Q’s safeguarding or welfare. They were not the most proportionate tool available, and the extent of the strip search did not keep the degree of intrusion to the minimum.
- 5.48 It is also worth highlighting the IOPC finding²² of a complaint in September 2020 that emphasised ‘*the use of the smell of cannabis as a single ground is not good practice as set out in the College of Policing’s Authorised Professional Practice on stop and search.*’
- 5.49 Whilst fully acknowledging the complexities that face front-line policing and the challenges in making definitions ‘too tight’, it seems to the review that better guidance and training covering ‘reasonable grounds’ would benefit decision making, particularly where this involves children. Practice was undertaken by officers believing they were operating in line with law and policy. Even by doing so, their actions arguably criminalised Child Q and caused her significant harm.

Recommendation 9: The MPS should engage The College of Policing to explore potential improvements to the guidance concerning reasonable grounds involving stop and search activity with children.

Finding 6: The absence of any specific requirement to seek parental consent when strip searching children undermines the principles of parental responsibility and partnership working with parents to safeguard children.

- 5.50 A clear theme of practice on the day of the strip search was the lack of any parental engagement. One account from the police states that Child Q was asked if she wanted her mother to be contacted, which they say she declined.

²² <https://www.policeconduct.gov.uk/news/iopc-upholds-cyclist%E2%80%99s-stop-and-search-complaint-against-metropolitan-police-officer>

Child Q disputes this and states that she did in fact ask for her mother on both this and other occasions that day. In the opinion of the review, little thought appears to have been given to the importance of contacting someone with parental responsibility for Child Q.

5.51 This was first seen in the school's response. Despite Child Q's mother being contacted following the previous incident, this wasn't done immediately on this occasion. It is likely that the involvement of the police influenced this being considered in the depth that would have reflected best practice. School staff appear to have deferred to the decisions of the police. That said, the DfE guidance on searching screening and confiscation²³, is also light on the inclusion of parental consent as an issue of importance. Section 16 of this guidance includes the following relevant statements:

- *'Schools are not required to inform parents before a search takes place or to seek their consent to search their child'*. The review agrees with this position.
- *'There is no legal requirement to make or keep a record of a search'*. This statement is permissive and whilst likely to be accurate from a legal sense, it runs the risk of promoting poor practice. There will be equally no legal impediment to recording a search. Any guidance that steers practitioners away from making records on safeguarding matters is poor and should be changed.
- *'Schools should inform the individual pupil's parents or guardians where alcohol, illegal drugs or potentially harmful substances are found, though there is no legal requirement to do so.'* In the absence of this document sufficiently referencing the requirement to safeguard children and engage external agencies, this point needs strengthening. Whilst noting that schools should inform parents or guardians, permissive statements such as this risk schools not doing anything. In Child Q's case, she was the one who had to tell her mother she had been searched by the school and

²³

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf

stripped searched by the police. In the opinion of the review, this ‘legally permissible practice’ is not good practice.

Recommendation 10: Alongside Recommendation 3, the Department for Education should review and revise its guidance on *Searching, Screening and Confiscation (2018)* to include much stronger reference to the importance of keeping records and engaging parents as part of best safeguarding practice.

5.52 In terms of the strip search of Child Q, her mother was neither engaged to seek consent nor informed by the police that the search was going to take place or had taken place. In the opinion of the review this was poor practice.

5.53 However, as set out within PACE 1984, there is no specific requirement to gain parental consent prior to a strip search – even those that might involve the exposure of intimate parts of the body. For intimate searches, this position is different. Annexe A, 2B of the Revised Code C, PACE 1984 states:

*‘In the case of a juvenile or a vulnerable person, the seeking and giving of consent must take place in the presence of the appropriate adult. **A juvenile’s consent is only valid if their parent’s or guardian’s consent is also obtained** unless the juvenile is under 14, when their parent’s or guardian’s consent is sufficient in its own right.’*

5.54 Both the review and the reference group struggled to understand the rationale behind these differing approaches to consent. On the face of it, the law appears to suggest that the requirement for a child to expose their intimate body parts is insufficiently significant to require their parents to be told it is going to happen.

5.55 This fundamentally fails to acknowledge the dehumanising and traumatic impact that such searches can have on children, and again, the important role that parents / carers have in terms of protecting their own children. It potentially minimises the ability of parents / carers to provide immediate support. The

review struggled to see how the absence of any requirement to even tell parents that a strip search was going to take place could be in a child's best interests.

Recommendation 11: The Home Office and the National Police Chiefs Council should seek to strengthen the Revised Code C, PACE 1984 to better define the engagement of parents / carers / guardians when strip searches that involve the exposure of intimate parts of the body are undertaken on children.

- 5.56 The review considers that benefits could also be accrued by educating and empowering young people to better understand their rights in respect of stop and search activity by the police.
- 5.57 Indeed, Child Q was fully compliant with the school's search of her possessions and compliant with the request to be strip searched by the police. Whilst not advocating she should have been disruptive, she appeared unable to challenge any of the actions being undertaken and is unlikely to have known about what she could expect, even by way of procedure (i.e. such as the requirement for both her and an Appropriate Adult to agree and sign for the Appropriate Adult not to be present during the strip search). She responded in this way, despite being adamant that she had no drugs in her possession and being upset about not being allowed to take her mock examination.
- 5.58 The reference panel considered the arrival of the police at school and how Child Q might have reacted to this trauma. Whilst well-known behavioural responses are the fight, flight, or freeze responses, Child Q may have experienced a fawn response²⁴. Flight includes running away, fight is to challenge aggressively, and freeze is when someone becomes unable to move physically or make choices. The fawn response involves rapidly moving to try to please a person to avoid any conflict. This could have accounted for Child Q's compliance.
- 5.59 Whilst only a hypothesis, the circumstances nonetheless highlight evidence of where improvements could be made in directly raising awareness and

²⁴ <https://www.psychologytoday.com/us/blog/addiction-and-recovery/202008/understanding-fight-flight-freeze-and-the-fawn-response>

knowledge amongst children about their rights. A range of material²⁵ already exists that could be developed in this context.

Recommendation 12: The CHSCP should engage ACCOUNT, Safer Schools Police Officers and other community organisations to develop an awareness raising programme across schools and colleges about stop and search activity by the police.

Covid-19

Finding 7: The Covid-19 restrictions in place at the time appeared to have frustrated effective communication between school staff and the Safer Schools Officer.

- 5.60 The Safer Schools Police Officer (SSPO) was not on the school premises due to the Covid-19 restrictions in place at the time. In usual circumstances, it is likely that the SSPO would have been directly involved with Child Q and this may have led to a different response. Whilst only a hypothesis, the review is alert to the fact that the attending officers that strip searched Child Q had no experience of working in schools.
- 5.61 The SSPO's absence may also have contributed to a dilution in the accuracy of information sharing and a collective understanding about what was being asked for and what would happen. There remain differing accounts provided by teachers and the SSPO as to what exactly the police were being contacted for and the expectations of their subsequent actions.
- 5.62 Whilst no specific recommendations are made in respect of Covid-19 arrangements, there is relevant learning to be accrued about how the SSPO role can help promote a wider understanding about stop and search powers and how these relate to children.

²⁵ https://www.london.gov.uk/sites/default/files/kyr_inner_april_19_v5_new.pdf

Racism

5.63 Finding 8: Having considered the context of the incident, the views of those engaged in the review and the impact felt by Child Q and her family, racism (whether deliberate or not) was likely to have been an influencing factor in the decision to undertake a strip search.

5.64 The actions of professionals involved on the day of the strip search have been evaluated in the context of Child Q's ethnicity and whether she was treated differently because she is Black.

5.65 The importance of this line of enquiry is starkly reflected in several events that took place around the same time. Significantly, some six months prior, George Floyd was tragically killed in the USA and there were repercussions around the globe, including in the UK. It brought into sharp focus some of the negative experiences that Black and Global Majority Ethnic communities can experience when interacting with the police. Valid questions have been raised about racism within the police and other agencies, the priority given to tackling this and whether organisational commitment ever rises above the rhetoric.

5.66 The strip search of Child Q also took place two months before HMICFRS²⁶ published its report into the disproportionate use of police powers²⁷. In her introduction to the HMICFRS report, Wendy Williams CBE, HM Inspector of Constabulary stated:

'Some of the most intrusive and contentious police powers are those that allow the police to use force and to stop and search people. Some view stop and search as a valuable tool in the fight against crime, while others argue that its use has little effect on crime rates and can in fact increase disorder. For some, particularly Black, Asian and Minority Ethnic people, it can reinforce the perception that there is a culture of discrimination within the police. And, now

²⁶ Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services

²⁷ [Disproportionate use of police powers - A spotlight on stop and search and the use of force, HMICFRS Feb 21](#)

that we have some long-awaited data on the police use of force, similar concerns are arising about this area of practice.'

- 5.67 In framing the rationale for this finding, the review has intentionally avoided the use of '*unconscious bias*'. In the opinion of both the review and its reference group, as a term, this somewhat excuses the actions of those involved. It gives the perception that agencies and its practitioners aren't accountable for what they say or do and that they are unable to pause, reflect and consciously control their actions. It similarly suggests that the behaviour and culture within organisations can't be changed. The review disagrees.
- 5.68 Furthermore, Child Q and her family strongly believe that the strip search of Child Q was a racist incident. Whilst acknowledging the ongoing debate concerning definitions²⁸, the review and reference group were clear that the perception of the victim is central to how racism is defined.
- 5.69 Indeed, the review and reference panel held a firm view that had Child Q not been Black, then her experiences are unlikely to have been the same. This view is broadly supported when looking at the disproportionality evidenced in a previous inspection of custody suites in the MPS. Undertaken by HMICFRS and HM Inspectorate of Prisons in 2018²⁹, this inspection found clear evidence of a disproportionate approach in this area of practice.

'Force data indicated that the numbers of strip searches were high and included many children and a significantly higher proportion of black and minority ethnic detainees compared against the overall throughput. We concluded that overall not all strip searches were warranted or properly justified.'

- 5.70 The full reasons behind why racism continues to feature in professional safeguarding practice are without doubt wide-ranging and complex. The review is simply unable to de-construct all these areas within this report.

²⁸ [Commission on Race & Ethnic Disparities 2021](#)

²⁹ [Metropolitan Police Service police custody suites, Jan 2019](#)

- 5.71 That said, one feature believed to have a significance to the experience of Child Q is that of adultification bias. This concept is where adults perceive Black children as being older than they are. It is *'a form of bias where children from Black, Asian and minoritised ethnic communities are perceived as being more 'streetwise', more 'grown up', less innocent and less vulnerable than other children. This particularly affects Black children, who might be viewed primarily as a threat rather than as a child who needs support'*³⁰.
- 5.72 A US study by Georgetown Law's Center on Poverty and Inequality in 2017³¹ found that Black girls as young as five years old were seen *'as being less in need of protection and nurturing compared to their white counterparts.'* Research also showed that Black girls were 2.7 times more likely to be referred to the juvenile justice system, 2 times more likely to be disciplined for minor violations at school and 20% more likely to be charged with a crime. Whilst a US study, these experiences won't be isolated there.
- 5.73 In reflecting on how adultification bias might have been evident in practice with Child Q, this can be seen in the fact that she received a largely criminal justice and disciplinary response from the adults around her, *'rather than a child protection response'*. This firmly echoes the findings of Davis and Marsh, 2020³². The review believes there to be a high level of probability that practitioners were influenced in this regard. The disproportionate decision to strip search Child Q is unlikely to have been disconnected from her ethnicity and her background as a child growing up on an estate in Hackney.
- 5.74 Recognising the need to immediately influence practice in this regard, the CHSCP commissioned a 12-month programme of multi-agency training sessions on adultification bias. Initially delivered to senior leaders across the safeguarding partnership, this training covers the broad concepts of racism, intersectionality and adultification bias, helping practitioners understand notions

³⁰ <https://learning.nspcc.org.uk/safeguarding-child-protection/children-from-black-asian-minoritised-ethnic-communities#heading-top>

³¹ <https://www.law.georgetown.edu/news/research-confirms-that-black-girls-feel-the-sting-of-adultification-bias-identified-in-earlier-georgetown-law-study/>

³² [Davis, J. and Marsh, N. \(2020\) Boys to men: the cost of 'adultification' in safeguarding responses to Black boys, Critical and Radical Social Work,8\(2\): 255–259.](#)

of vulnerability and childhood and how these are applied to some children more than others. Specific sessions have been held for the police to facilitate maximum attendance, with scheduled sessions also set up for schools.

- 5.75 The review is also alert to significant activity ongoing across the partnership to create the right conditions for anti-racist practice to thrive and be the norm. Whilst safeguarding partners recognise there is more to do, the review acknowledges both the leadership commitment supporting this work and the rapid training response as positive practice. It makes the following two recommendations:

Recommendation 13: The CHSCP should continue with its rolling programme of multi-agency adultification training. Participation should be actively focused on practitioners from the police and schools, with the Training, Learning & Development Sub group developing a process to specifically evaluate impact across these sectors.

Recommendation 14: The CHSCP should expedite its work on developing an anti-racist charter and practical guides that support the eradicating of racism, discrimination and injustice across its local safeguarding arrangements.

#	Recommendation	Activity undertaken before incident involving Child Q	Activity undertaken following incident involving Child Q and pre-publication of report	Planned Activity
1	<p>ANY RELATED ACTIVITY INVOLVING ENGAGEMENT WITH THE NATIONAL CSPRP AS PART OF THE SYSTEM FOR REVIEWING SERIOUS CHILD SAFEGUARDING CASES</p> <p>The Child Safeguarding Practice Review Panel should engage the IOPC with a view to developing national guidance on the IOPC's interface with the Local Child Safeguarding Practice Review process. As a minimum, this should set out the arrangements for securing cooperation, accessing key staff for interview and the requirements for the timely sharing of</p>			
2	<p>ANY RELATED ACTIVITY INVOLVING RECORDING AND OVERSIGHT OF ALL TYPES OF POLICE SEARCHES INVOLVING CHILDREN.</p> <p>The MPS should review and revise its recording system for stop and search to ensure it clearly identifies and allows for retrieval of the full range of activity under stop and search powers (including the ability to differentiate between the different types of strip searches undertaken).</p>			
3	<p>ANY RELATED ACTIVITY INVOLVING GUIDANCE / POLICY / PROCEDURE FOR SCHOOLS AND OVERSIGHT OF SCREENING, SEARCHING & CONFISCATION</p> <p>The Department for Education should review and revise its guidance on Searching, Screening and Confiscation (2018) to include more explicit reference to safeguarding and to amend its use of inappropriate language.</p>			
4	<p>ANY RELATED WORK CONCERNING THE USE OF APPROPRIATE ADULTS IN ANY CONTEXT</p> <p>The MPS should update its guidance note and local policy to better emphasise the requirements for engaging an Appropriate Adult under the revised Code C, PACE, 1984.</p>			
5	<p>ANY RELATED ACTIVITY COVERING PRACTITIONER UNDERSTANDING OF THE PRINCIPLES OF SAFEGUARDING FIRST (INCLUDING DISEMINATING LESSONS FROM PREVIOUS REVIEWS), CHALLENGE & ESCALATION, ROLES AND RESPONSIBILITIES & PARAMOUNT FOCUS ON CHILDREN</p> <p>The CHSCP should review and revise its awareness raising and training content to ensure the Child Q case is referenced, with a specific focus on reinforcing the responsibilities of practitioners to advocate for and on behalf of the children they are working with / who are in their care.</p>			
6	<p>ANY RELATED WORK INVOLVING POLICY, GUIDANCE, TRAINING, OVERSIGHT OF ALL SEARCH ACTIVITY INVOLVING CHILDREN.</p> <p>Relevant police guidance (both local and national) governing the policy on strip searching children should clearly define a need to focus on the safeguarding needs of children and follow up actions that need to be considered by way of helping and protecting children at potential risk.</p>			
7	<p>ANY RELATED WORK COVERING ENGAGEMENT / INVOLVEMENT WITH COMMUNITY ORGANISATIONS AND OTHER PARTNERS TO OVERSEE POLICE SEARCH ACTIVITY INVOLVING CHILDREN</p> <p>The Central East BCU should engage the local stop and search monitoring group, ACCOUNT, and other representative bodies to consider the lessons from this review and how the effectiveness of safeguarding (as part of stop and search practice) can be overseen through their respective activities.</p>			

8	<p>ANY RELATED WORK INVOLVING GUIDANCE, TRAINING, SUPPORT ON PROFESSIONAL RESPONSE TO SUSPECTED / KNOWN SUBSTANCE MISUSE BY CHILDREN.</p> <p>Where any suspicion of harm arises by way of concerns for potential or actual substance misuse, a safeguarding response is paramount. Practitioners should always contact Children's Social Care to make a referral or seek further advice in such circumstances.</p>			
9	<p>ANY ACTIVITY - SUCH AS DEVELOPING GUIDANCE / TRAINING ON WHAT CONSTITUTES REASONABLE GROUNDS FOR INITIATING A SEARCH OF A CHILD</p> <p>The MPS should engage The College of Policing to explore potential improvements to the guidance concerning reasonable grounds involving stop and search activity with children.</p>			
10	<p>ANY RELATED WORK ON RECORD KEEPING AND PARENTAL ENGAGEMENT WHEN WORKING WITH CHILDREN.</p> <p>Alongside Recommendation 3, the Department for Education should review and revise its guidance on Searching, Screening and Confiscation (2018) to include much stronger reference to the importance of keeping records and engaging parents as part of best</p>			
11	<p>AS ABOVE</p> <p>The Home Office and the National Police Chiefs Council should seek to strengthen the Revised Code C, PACE 1984 to better define the engagement of parents / carers / guardians when strip searches that involve the exposure of intimate parts of the body are undertaken on children.</p>			
12	<p>ANY WORK UNDERTAKEN WITH CHILDREN TO PROMOTE THEIR UNDERSTANDING OF THEIR RIGHTS IN TERMS OF STOP & SEARCH</p> <p>The CHSCP should engage ACCOUNT, Safer Schools Police Officers and other community organisations to develop an awareness raising programme across schools and colleges about stop and search activity by the police.</p>			
13	<p>ANY TRAINING MADE AVAILABLE ON ADULTIFICATION / RACISM + NUMBERS TRAINED</p> <p>The CHSCP should continue with its rolling programme of multi-agency adultification training. Participation should be actively focused on practitioners from the police and schools, with the Training, Learning & Development Sub group developing a process to specifically evaluate impact across these sectors.</p>			
14	<p>ANY RELATED ACTIVITY INVOLVING THE DEVELOPMENT / PROMOTION OF ANTI-RACIST PRACTICE</p> <p>The CHSCP should expedite its work on developing an anti-racist charter and practical guides that support the eradicating of racism, discrimination and injustice across its local safeguarding arrangements.</p>			

Committee:	Date:
Police Authority Board	25 May 2022
Subject: Police, Crime, Sentencing and Courts Bill	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 6, 12
Does this proposal require extra revenue and/or capital spending?	No
Report of: Remembrancer Report author: Kiki Hausdorff, Assistant Parliamentary Affairs Counsel	For Information

Summary

The Police, Crime, Sentencing and Courts Act received Royal Assent on 28 April. The Act makes provision for the protection and wellbeing of police and other emergency workers and grants the police further powers to address crime and disorder, among other wide-ranging provisions. During its passage through Parliament, the Act encountered controversy directed at its public order provisions in Part 3, which strengthen police powers to restrict public processions and assemblies, and which led to so-called 'Kill the Bill' protests.

In the latter stages of consideration of the Bill, known as 'Ping Pong', a Government amendment was passed to include in the Act provision repealing the Vagrancy Act 1824, which made rough sleeping and begging criminal offences in England and Wales. The repeal will not come into force for up to 18 months, after replacement legislation is passed.

Recommendation

Members are asked to note the contents of this report.

Main Report

Parliamentary proceedings

1. The Act was introduced in the House of Commons in March 2021 and was then "carried over" into the next Parliamentary Session. There was fierce opposition to the public order provisions in Part 3 of the Act, with several unsuccessful attempts to expunge Part 3 wholly or partly from the Bill. In a lengthy ping-pong between the Houses, peers rejected some of the public order provisions three times before capitulating to MPs' insistence. The Act received Royal Assent at the prorogation of Parliament on 28 April.

Commencement

2. Some provisions, such as the public order provisions, will come into force through secondary legislation. Some provisions came into force on Royal Assent on 28 April, while others will come into force two months after Royal Assent.

The Aims of the Act

3. The stated purposes of the Act are to:
 - a) protect the police and other emergency workers and enhance the wellbeing of police officers and staff;
 - b) protect the public by giving the police the tools needed to address crime and disorder, and by addressing the root causes of serious violent crime using multi-agency approaches to prevention;
 - c) ensure that the most serious violent and sexual offenders spend time in prison that matches the severity of their crimes, protects victims and gives the public confidence;
 - d) address repeat and prolific offenders through robust community sentences which punish and also address offenders' needs; and
 - e) modernise the delivery of criminal justice by overhauling existing court processes to provide better services for all court users.

Content of the Act

4. Parts 1, 2 and 3 of the Act may be of particular interest to the Board.
5. Part 1 contains measures aimed at protecting the police and other emergency workers, for example by doubling the maximum penalty for assault on emergency workers from 12 months to two years. Part 1 also places a duty on the Secretary of State to publish an annual report on progress against the delivery of the Police Covenant.
6. Part 2 contains measures to prevent, investigate and prosecute crime. This includes a duty on authorities (including local authorities and chief officers of police, including the Common Council acting as local authority for the City and the Commissioner) to collaborate with each other to prevent and reduce serious violence. This part of the Act also strengthens the courts' sentencing powers in relation to criminal damage to memorials, and makes provision for the extraction of information from digital devices for the purposes of the prevention, detection, investigation or prosecution of crime, safeguarding purposes and the purposes of investigating deaths.
7. Part 3 strengthens police powers to address non-violent protests. This includes provisions to extend the powers to place conditions on public processions and assemblies; amend the offence relating to the breaching of conditions placed on a public procession or assembly; replace the common law offence of public nuisance with a new statutory offence; and amend the legal framework designed to prevent

disruptive activities in the vicinity of the Palace of Westminster to ensure vehicular access to Parliament.

Public order provisions

8. Part 3 of the Act:
 - a) Amends the Public Order Act 1986 to broaden the range of circumstances in which the police can impose conditions on protests, including where the noise of the protest causes “intimidation or harassment” or “alarm or distress”.
 - b) Amends the Police Reform and Social Responsibility Act 2011 to expand the ‘controlled area’ around Parliament where certain protest activities are prohibited. It would also add obstructing access to the parliamentary estate to the activities prohibited in the controlled area.
 - c) Abolishes the common law offence of public nuisance and replaces it with the statutory offence of ‘intentionally or recklessly causing public nuisance’.

Parliamentary responses to the public order provisions

9. As previously reported to the Board, there were numerous attempts, both in the Commons and the Lords, to remove Part 3 entirely or partly from the Act. Some parliamentarians opposed the principle behind the proposed police powers to place conditions on public processions and assemblies, arguing that this struck the wrong balance and threatened freedom of speech. There were also concerns that the terminology used in the provisions would “put police officers on the front line in the impossible situation of deciding when a protest is too noisy...”, with several parliamentarians objecting to the language as “vague” and “imprecise”.
10. Home Office Minister Baroness Williams of Trafford argued that the provisions sought a “modest reset” of the “balance between the rights of protesters to exercise their freedom of speech and assembly... and the rights of non-protestors who might be adversely affected by a protest.” She argued that it is “completely unacceptable that a small minority of protestors can, through the use of amplification equipment or other means, impose disruption and misery upon the public through the excessive noise they generate.” The Minister assured peers that the Government “expect the vast majority of protests to be unaffected by these provisions. It is exceptional for the police to attach any conditions to a protest, and that will not change.”
11. In response to concerns about the language of the Act, during ping-pong the Government removed “serious unease” as a trigger for the police power to attach noise-related conditions to protests. Crime and Policing Minister Kit Malthouse argued that the other terms used, such as “alarm” and “distress”, were “precedented and well understood by the police and courts,” and assured MPs that the Government “do not believe there is room for misinterpretation.” He said the provisions created “proportionate” and “modest” powers, which gave the police powers to strike the appropriate balance appropriate. He felt it was “entirely reasonable” that the police should be able to impose conditions when faced with “a prolonged protest in, for example, a residential or commercial area, where the

level of noise is such as to amount to intimidation or harassment, or is causing alarm or distress.”

Repeal of the Vagrancy Act 1824

12. During ping-pong, a Government amendment was passed to include in the Act provision repealing the Vagrancy Act 1824, which made rough sleeping and begging criminal offences in England and Wales. The Government’s amendment was tabled in lieu of an amendment passed in the Lords, tabled by Lord Best (Crossbench). The Government opposed the Lords amendment because it included provision on the exercise of police powers to tackle rough sleeping and begging under the Anti-social Behaviour, Crime and Policing Act 2014.
13. The Government amendment represented an about-turn; earlier during consideration of the Bill, the Government had argued that “an outright repeal of the Vagrancy Act might leave a gap” and was “premature”. Ministers assured parliamentarians that “once the necessary work has been concluded, the Government are committed to repealing the outdated Act and replacing it with much more modern, fit-for-purpose legislation when parliamentary time allows.” The Government were pressured to address the issue more urgently by the passing of Lord Best’s amendment. In announcing the Government amendment, Home Office Minister Kit Malthouse paid tribute to the campaign run by Nickie Aiken (Conservative), the MP for the Cities of London and Westminster, among others. The Corporation had engaged in this aspect of the Bill.
14. While the Government amendment provides for the Vagrancy Act to be repealed in full in England and Wales, the Government have stated they intend to enact replacement legislation in the new Parliamentary Session before bringing the repeal of the 1824 Act into force. They will therefore delay commencement of the repeal for up to 18 months. The Minister assured the House that, in the meantime, the Government will “publish a bold new strategy to end rough sleeping,” setting out “how we will ensure that rough sleeping is prevented in the first instance and is effectively responded to in the rare cases where it does occur, and that our police have the ability to intervene where needed and keep everybody safe, including the person at issue.”
15. Nickie Aiken told the House that the Cities of London and Westminster have the largest number of rough sleepers in the United Kingdom. In response to concerns that the repeal would hinder the police’s ability to deal with aggressive begging, she argued that other more recent legislation is relied on by the police “in the majority of cases”. She told MPs that “arrests and prosecutions under the Vagrancy Act have plummeted since 2014,” and that, “from the conversations I have had with the Met and the City of London Police, I believe alternative powers to deal with aggressive begging are already available.” Aiken added that she was “a pragmatist,” and therefore accepted the Government’s position of “seeking a thorough and comprehensive review,” but she asked the Minister to “ensure that that is done quickly and concisely”, arguing that 18 months was too long a period.

Conclusion

16. As noted above, the repeal of the Vagrancy Act 1824 will be delayed for up to 18 months and will not come into force until replacement legislation is passed. The

public order provisions will come into force through secondary legislation which is yet to be published.

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Committee(s): Strategic Planning and Performance Committee	Dated: 5 May 2022
Police Authority Board	25 May 2022
Subject: Quarterly Community Engagement Update	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1. People are safe and feel safe
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Commissioner of Police Pol 21-22	For Information
Report authors: HQ, Sector Policing & Specialist Operations, CoL Community Safety	

Summary

This report provides the quarterly update (January 2022 to March 2022) on engagement taking place across the City of London Police area within the following areas: (1) Counter Terrorism (CT) and Prevent; (2) Safeguarding the Vulnerable; (3) PREVENTion of Fraud and Cyber Crime; (4) Anti-Social Behaviour (ASB) and Sector Policing; (5) Engagement with the Independent Advisory and Scrutiny Group (IASG)

1. **Counter Terrorism and Prevent:** Work within CT continues at pace. The Prevent team continue to engage with the CoLP Vulnerability Working Group as the 14th strand of vulnerability to ensure radicalisation is considered in all areas of policing.
2. **Safeguarding the Vulnerable:** Since the last reporting period and the changing landscape in relation to Covid and the easing and reintroduction of restrictions, the City of London Police (CoLP) has maintained an active role in community engagement around Violence against Woman and Girls (VAWG). The Public Protection Unit (PPU), City of London Corporation (CoLC) Community Safety Team and Vulnerable Victim Advocate produced an input on staying safe in the City delivered to over 600 city workers.
3. **PREVENTion of Fraud and Cyber Crime:** The 21/22 fiscal year (FY) has been the most successful for the Cyber Griffin programme yet, having trained around 11,000 individuals and conducted over 260 dedicated cyber Protect services to businesses and organisations throughout the Square Mile.
4. **ASB and Sector Policing:** Levels of ASB reporting have decreased slightly in Q4 with a decrease of 13%. Levels of ASB are higher than those reported in 2021 but lower than both 2019 and 2020. Engagement by the Dedicated

Ward Officers (DWO) and partnership work with COLC continues with a number of initiatives.

5. **Independent Advisory Scrutiny Group (IASG) Engagement:** Work continues with the IASG in undertaking scrutiny of the force in such areas as stop and search and use of force. Plans are underway to introduce a Youth Independent Advisory Group (YIAG), which will be administered by the Partnership and Prevention Hub (P&P Hub).

Recommendation

Members are asked to note the report.

Main Report

1. Counter Terrorism and Prevent

PREVENT: Jan-Mar 2022

Referrals

- 1.1 The Prevent team has received 2 new Prevent referrals during this period. One of which has now been relocated by the Home Office from within the City of London to Coventry. The other was a student studying in the City of London, who resided in the MPS jurisdiction. Therefore, deconfliction was undertaken by the CoLP and then referred to the MPS.
- 1.2 Our existing case was closed by the Chanel panel in January 2022 as he continued to make excellent progress. Advice was given to partners to contact the Prevent team if any further concerns were raised regarding this individual.

Prevent team meetings / Media:

- 1.3 The Prevent team are involved with a Project Starlight pilot in the CoLP. Project Starlight is a national project run by CT policing which identified a link between terrorism offenders and domestic violence perpetrators, victims and witnesses. The CoLP pilot is currently still in the planning phase but will involve a series of pertinent questions asked by the Public Protection Unit (PPU) when speaking to domestic violence victims during the course of their investigation. Answers supplied will assist in identifying any concerning behaviours of the offender and the Prevent team would be made aware for any subsequent investigation. This pilot will be a collaborative approach with Prevent and PPU.
- 1.4 The Prevent team continue to engage with the CoLP vulnerability working group as the 14th strand of vulnerability to ensure radicalisation is considered in all

areas of policing¹. The Prevent team plan to launch an awareness campaign in the coming months around V2R (Vulnerability to Radicalisation) to highlight the dangers of radicalisation and signs displayed when a person is in the process of being radicalised.

Stalls/Engagement

- 1.5 Engagement with all City university sites and schools completed during this period. Engagement has also taken place with City churches via the Church Watch scheme.
- 1.6 Further engagement planned with a number of high-profile businesses regarding Prevent training opportunities. The importance of Prevent was reiterated to businesses during the CT2022 event.
- 1.7 In the coming weeks, Prevent stalls will be held at various locations including Guildhall School of Music and Drama and 150 Cheapside. Numerous businesses are still limiting contact from external agencies due to Covid concerns. Engagement continues with all businesses/partners where opportunities arise.

Internal Women's Network/Islamic Women's Network

- 1.8 Prevent officers continue to support various police and local networks to ensure an understanding of Prevent and the knowledge and confidence to come forward with any concerns they may have.

Practical Training Package

- 1.9 The Prevent team delivers a training package to identify signs of radicalisation and what to do when this occurs. Prevent training sessions are being held internally on a monthly basis for new recruits and transferees. Sessions are also planned for 2 businesses and a City school in the coming month.

Regional Meeting/Training

- 1.10 The Prevent team is continuing to work with the Prevent teams from around the country looking at the best ways for improving professional and best practice.

CT Local Profile (CTLP)

- 1.11 CTLP Stakeholder Engagement event was held in January with numerous local stakeholders invited. The importance of the CTLP was explained and external speakers also gave an input on the ERW (Extreme Right Wing) and ALM (Al-Mihajiroun). Partners have subsequently been asked to complete a questionnaire and return to the Prevent team which will assist in compiling the new CTLP document for 2022. Once compiled, a further event will be planned to share this with partners.

¹ This relates to the NPCC National Vulnerability Action Plan where risk of radicalisation is being implemented as the 14th core discipline of public protection. [NVAP.pdf \(npcc.police.uk\)](#)

Collaborative working with Corporation of London Prevent Lead

1.12 The CTCO (Counter Terrorism Case Officer) and City of London Corporation (CoLC) have agreed and finalised a joint action plan to ensure progress and delivery of products and services is shared and joined up. The CoLC Community Safety officer – Prevent lead left the post during this period and Their replacement started in April.

PREPARE & PROTECT: Jan to Mar 2022

Counter Terrorism Security Adviser (CTSA) team:

1.13 The CTSA team proactively support the Protect and Prepare elements of the national CONTEST Strategy, delivering on protective security advice, CT awareness, both physical and people security measures and ensuring our community is prepared as possible in dealing with a terrorist attack. A fundamental part of the CTSA role is face to face engagement, assessment, and product delivery. With more City workers returning to the office, face to face delivery has increased over this reporting period.

1.14 The team continues to support partners within the City of London Corporation including the Public Realm and Planning teams. The CTSA team supported the local authority in providing security assessments on applications for table and chair licences and has improved physical security of crowded places within the City of London. Applications for these licences have vastly increased during this reporting period. The team has also continued with the crowded places assessments. Engagement continues with all businesses/partners where opportunities arise.

Practical Training Package

1.15 The CTSA's have continued to deliver training packages to businesses such as See Check and Notify (SCaN) to over 45 businesses and ACT (Action Counters Terrorism) to 20 businesses during this period.

Regional Meeting/Training

1.16 The CTSA office have been liaising with NaCTSO (National Counter Terrorism Security Office) and Homeland Security in consultations and workshops to assist in the development of the Protect Duty, to improve public security and to help shape future legislation.

1.17 The CTSA's recently hosted the CoLP's inaugural Counter Terrorism Conference – CT2022. This event brought together more than 150 security professionals, business leaders and counter terrorism experts, all unified in one shared goal – to make the City of London the safest city in the world. During the event, a new tool – the 'Notify Pad' designed by the CTSA's was showcased. The aim of which is to ensure the correct information is obtained when reporting suspicious activity

which allows for early notification of risks that may harm the CoLC. Positive feedback from participants has been received.

PURSUE: Jan to Mar 2022

- 1.18 The pursue detectives engage with business primarily because of Op Lightning-hostile reconnaissance activity reported by SCan trained security guarding. This partnership working allows for early notification of risks that may harm the City. Detectives provide guidance to guarding colleges on improvements to notifications to police which on occasions can be delayed, CCTV evidence gathering and security improvements.
- 1.19 Training packages have been developed primarily for police officers on how to deal with an arrested person for hostile reconnaissance. This has allowed the officers to have a greater awareness when dealing with detainees adding to their knowledge which promotes better engagement with the community when dealing with these types of incidents. These are rolled out to Uniform and front-line officers along with current threat briefings.
- 1.20 Officers regularly engage local Business forums such as the Crime Prevention Association, and Paternoster forum, delivering current Threat briefings and highlighting the affects a Terrorism attack could have on the City of London.
- 1.21 Detectives are developing a package along with our Public Protection Unit to highlight and understand the risk of radicalisation when vulnerable children and adults have witnessed or become involved in Domestic Abusive.

2. Safeguarding and Vulnerability

- 2.1 Since the last reporting period and the changing landscape in relation to Covid and the easing and reintroduction of restrictions, the CoLP has maintained an active role in community engagement around Violence against Woman and Girls (VAWG).
- 2.2 The Public Protection Unit (PPU), CoLC Community Safety Team and Vulnerable Victim Advocate produced an input on staying safe in the City. This was created for the City business community and focused on how men can help woman feel safer and looked to improve public confidence in the police. This input has been delivered to over 600 City workers.
- 2.3 Interest in the input has increased now that more workers are returning to their offices. The presentations have been well received and the presenters have been asked to produce a pre-recorded version to share wider than the City. This is currently being developed.
- 2.4 PPU are working closely with the Licensing Team, City Corporation Community Safety team and Vulnerable Victim Advocate to organise a conference for hotel staff. This has been provisionally booked for early June. The conference aims to empower staff to identify vulnerability and support people at risk of harm. It will include inputs on Modern Slavery and Human Trafficking (MSHT), domestic

abuse, child exploitation. There will also be inputs by guest speakers who have been victims of high harm offences.

- 2.5 There will also be an opportunity for hotel staff to undertake Welfare and Vulnerability Engagement (WAVE) training so that 'Ask for Angela' will be available in hotels alongside licensed premises. The increase in venues that offer 'ask for Angela' will further increase the feeling of safety in the City, especially during the Night Time Economy. Hotels have been chosen as they are open 24/7 with staff always present.
- 2.6 Ask for Angela is the name of a campaign in England that started in 2016 that is used by bars and other venues to keep people safe from sexual assault by using a codeword to identify when they are in danger or are in an uncomfortable situation.
- 2.7 The PPU continue to work closely with City school. Further engagement is planned with students at the City of London School (CLS) in relation to 'how men can help women feel safe'. This follows feedback from students at the City of London School for Girls (CLSG). This input will be provided in conjunction with the Vulnerable Victim Advocate and the Sector officer for the area.
- 2.8 In the coming months Operation MAKESAFE² will be implemented, this will enable police to test the response of City hotels, now they have returned to business as usual in many areas. The operation involves the Police Cadets which enable them to gain a greater understanding of high harm offences and vulnerability. The cadets provided positive feedback during their previous deployment. Since the last reporting period and the changing landscape in relation to Covid and the easing and reintroduction of restrictions, the CoLP has maintained an active role in community engagement around Violence against Woman and Girls (VAWG).

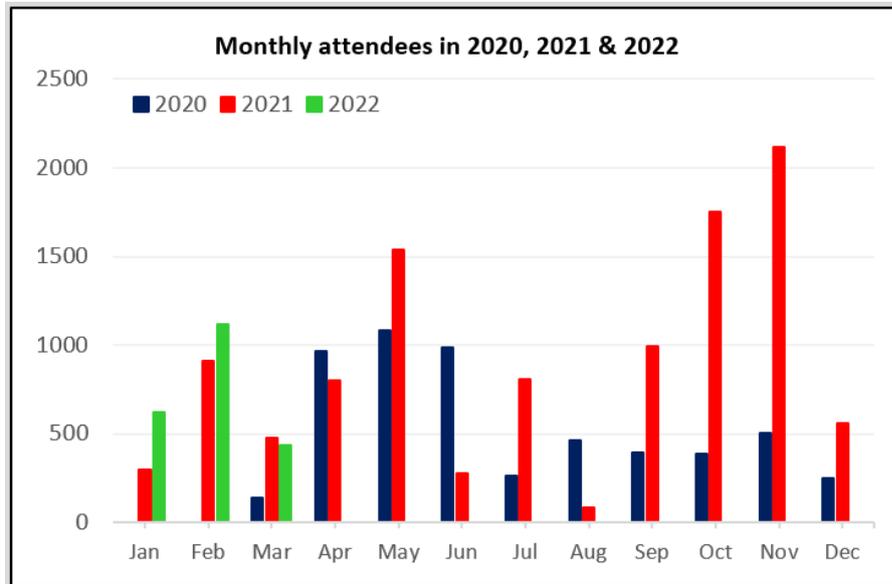
3. PREVENTion of Fraud and Cyber Crime

- 3.1 The 21/22 fiscal year (FY) has been the most successful for the Cyber Griffin programme yet, having trained around 11,000 individuals and conducted over 260 dedicated cyber Protect services to businesses and organisations throughout the Square Mile.
- 3.2 The beginning of 2022 has seen, on average, an increase in activity when compared to the same period in 2021. 60 core services have been conducted, 36% of which were scheduled on the month they were conducted. This is a common sight in Q4 as organisations request cyber Protect advice in preparation for the new FY. Additionally, despite only connecting with 24 new clients, the average attendance to each Baseline 3.0 has increased to 53 individuals, compared to only 38 last year.

² Operation Makesafe has been developed in partnership with London's boroughs to raise awareness of child sexual exploitation in the business community, such as hotel groups, taxi companies and licensed premises. It has been rolled out in other forces nationally.

3.3 Cyber Griffin continues to have positive meetings with Bristol University and remains on target to release the new Incident Response Exercise this year. Feedback on this new product continues to be positive, as does the feedback related to all existing Cyber Griffin core services. For more details, please visit the Cyber Griffin website: www.cybergriffin.police.uk

3.4 Monthly end users trained so far in 2022 compared to 2021 and 2020



PREVENTion of Fraud

3.5 **Safer Internet Day Urges 2 Factor Authentication:** The hacking of email and social media accounts was the most reported type of cyber-dependent crime last year, with over 13,000 reports received. This is why NFIB Protect chose to focus its Safer Internet Day (08 Feb) messaging on the importance of securing social media accounts using two-factor authentication (2FA). They worked with partners across policing, government and industry to deliver social media messaging that reached over 10.6M people and achieved 17.2M impressions in just 24 hours. Notable supporters of the campaign on social media included the Home Office, Cabinet Office, NCSC, Minister of State for Security Damian Hinds, Vodafone, TeamViewer, Neighbourhood watch as well as many police forces.

3.6 Additionally, the success of this campaign has generated positive feedback from partners, who are actively looking to collaborate with NFIB Protect on future campaigns and projects.

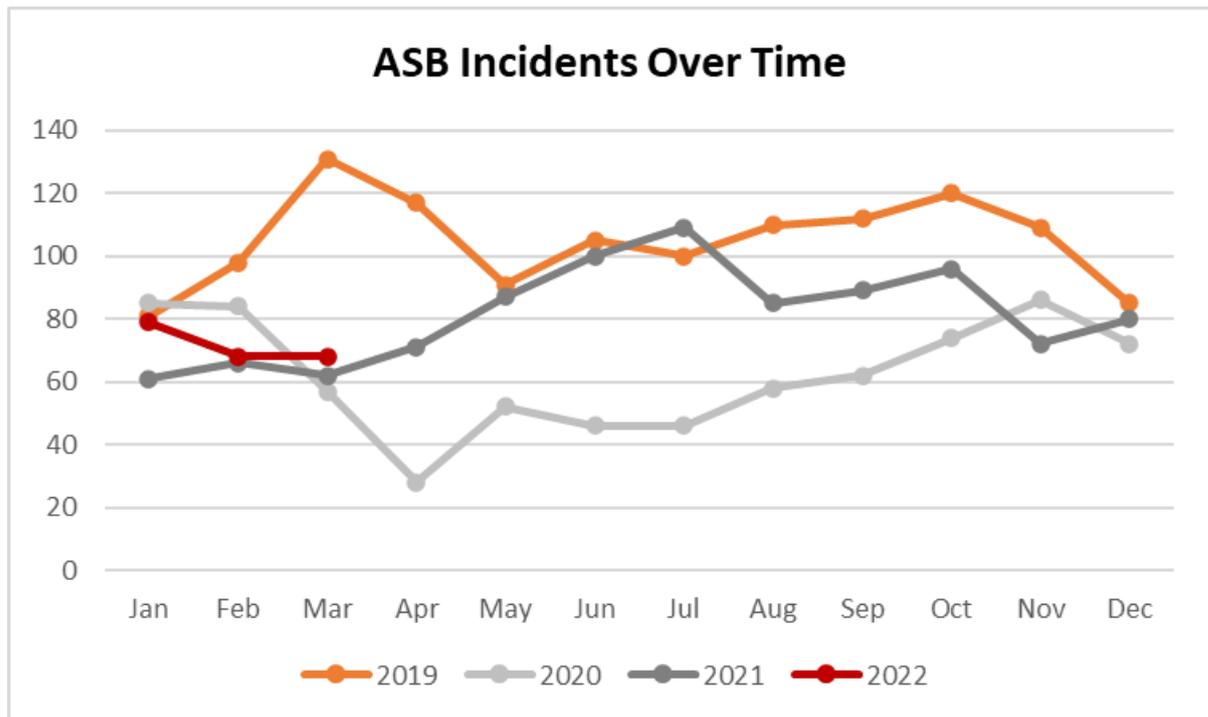
3.7 In the next quarter the Protect team will be: Running a national campaign through the Protect Network on remote access scams, utilising NCSC messaging to explain to the public, how to recognise MO's used by criminals. We will also be highlighting what steps the public can take to protect themselves against such attacks and what recovery they should put in place to protect themselves for further victimisation or revictimization.

- 3.8 We are currently in final stages of signing off a national roll out of domestic abuse training for officers, stakeholders and partners across the Protect network. It is hoped the training will be provided across the UK through the Protect network who will deliver it locally. It will focus on domestic abuse and stalking and harassment offending in virtual spaces. We are working locally with CoLP to ensure best practice features within our internal training plans.

4. ASB and Sector Policing

Anti-Social Behaviour (ASB)

- 4.1 Levels of reporting have decreased slightly this quarter compared to last, n=215 compared to n=248 in Q3 a decrease of 13%
- 4.2 Levels are higher than those reported in 2021 but lower than both 2019 and 2020.
- 4.3 The main type of ASB reported remains Inconsiderate Behaviour which can cover many types of incident.
- 4.4 Similar to last quarter we have seen a shift in reporting of incidents from the middle of the week towards Friday and Saturday with levels fairly consistent across the weekdays and then peaking on a Saturday before falling to the lowest level on Sunday.
- 4.5 Most incidents this quarter refer to individuals refusing to leave licensed premises or alight from buses and taxis, there has also been an increase in reports of aggressive individuals and fights related to night time economy venues.
- 4.6 Whilst there have been a few reports of groups skateboarding and cycling these are less than in previous reporting periods. There were also some reports of urban explorers but similarly less than in previous quarters.
- 4.7 ASB Incident Data by Month



2019	81	98	131	117	91	105	100	110	112	120	109	85
2020	85	84	57	28	52	46	46	58	62	74	86	72
2021	61	66	62	71	87	100	109	85	89	96	72	80
2022	79	68	68									

4.8 The number of ASB incidents has remained relatively stable this quarter after having decreased steadily from the peak seen in the summer 2021. Levels remain below those experienced before the covid-19 pandemic at present. We do often see lower levels of reporting from November through February perhaps due to colder weather.

4.9 On average there have been 72 incidents reported a month between January and March and 84 a month over the last 12 months. Compared to these months in 2021 we have seen a 14% increase in ASB reports this year however compared to 2019 there has been a decrease of 31% in ASB reports. The top three wards where ASB incidents took place this quarter are Bishopsgate (45), Tower (22) and Farringdon Within (18). The only notable repeat street location this quarter was Bishopsgate recording 26 incidents, 12 incidents occurred within the Barbican estate.

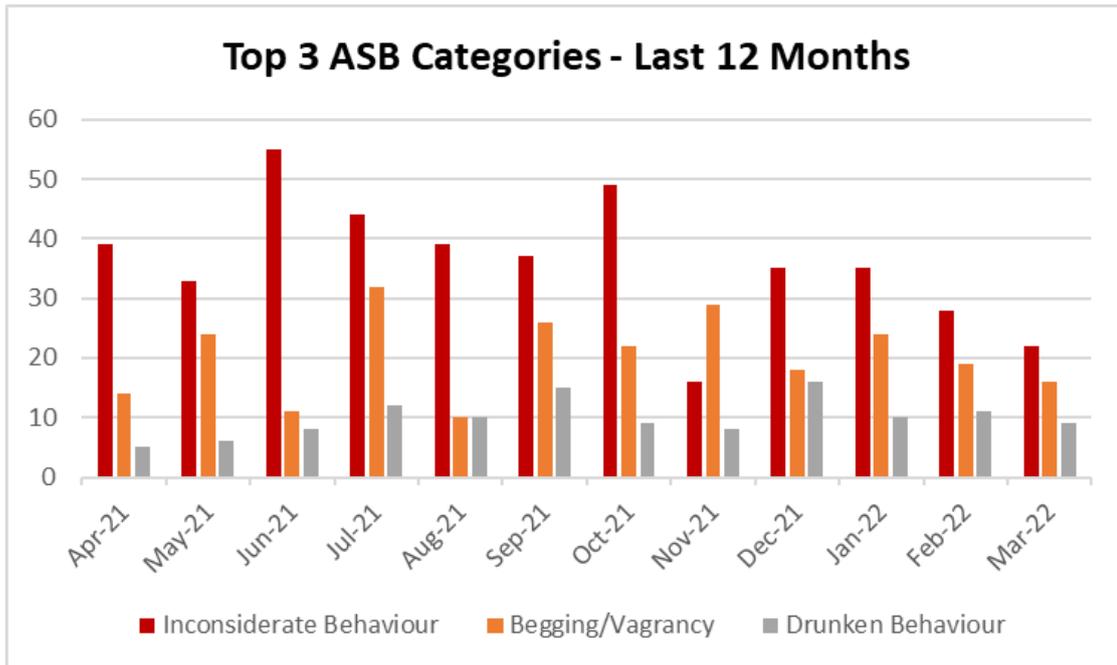
4.10 The top three wards where ASB incidents took place this quarter are Bishopsgate (44), Tower (24) and Castle Baynard (23).

Highest Recorded Categories

4.11 In the current period **Inconsiderate Behaviour** (n=85) is the most reported category of ASB with all other categories having very few reports. The next most common are **Begging/Vagrancy** (n=59) and **Drunken Behaviour**(n=30).

Levels of noise nuisance complaints have decreased significantly from their peak in 2020 with just 12 reports this quarter.

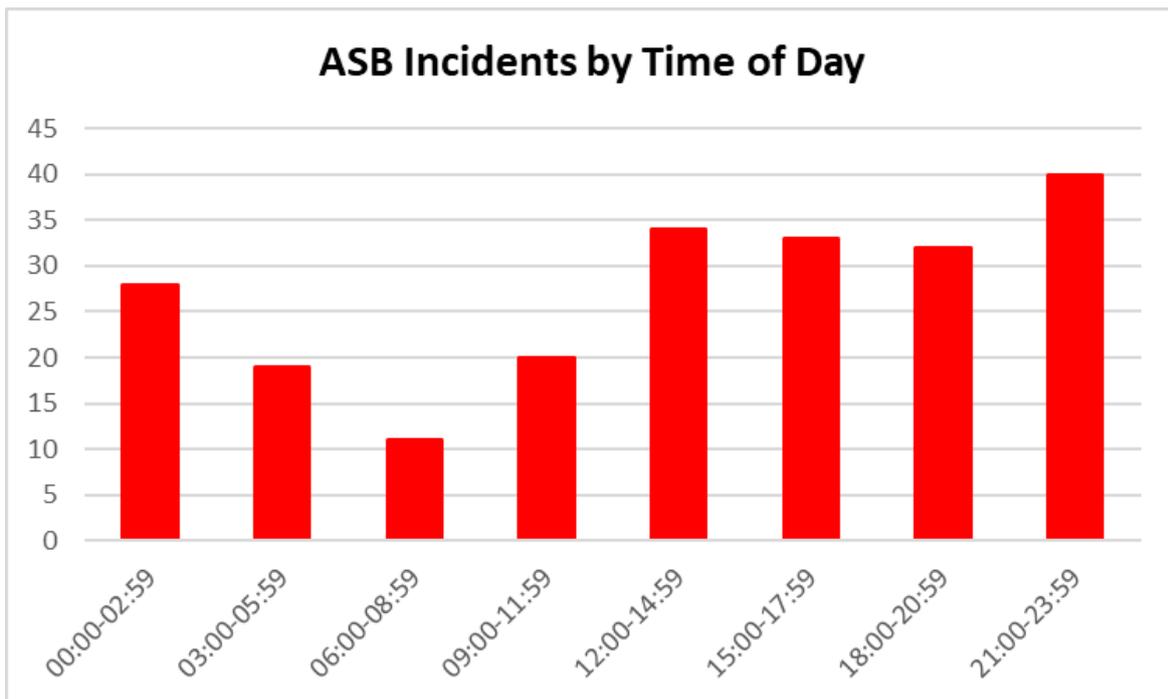
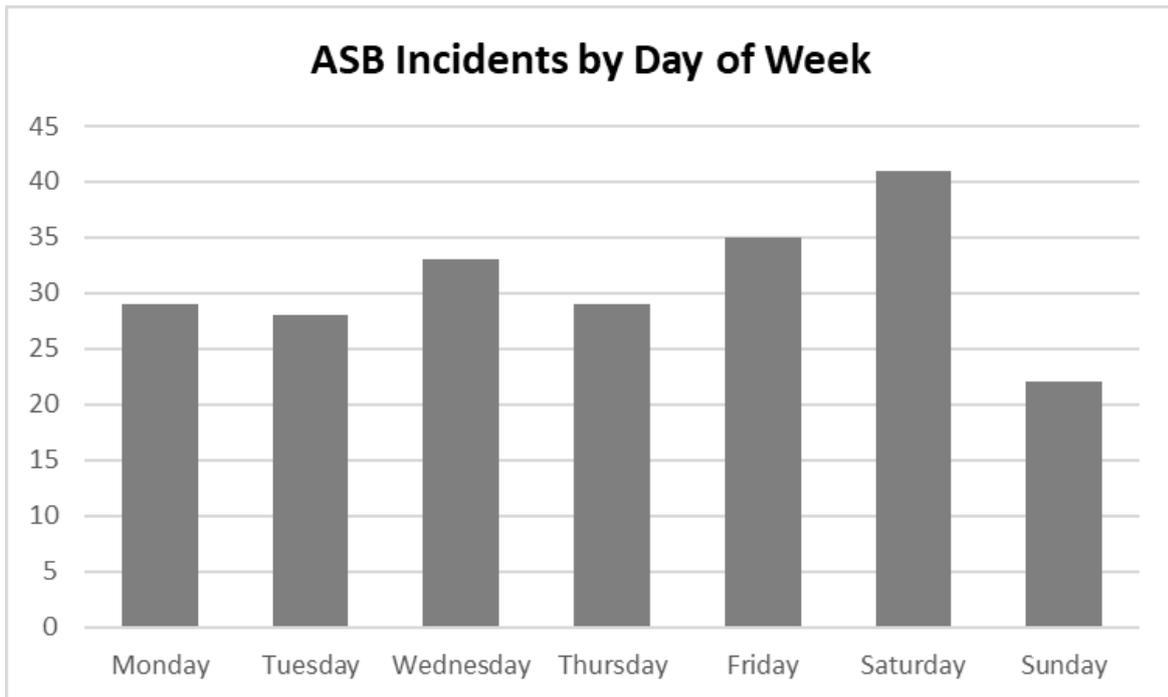
4.12 After reviewing records classified as **'Inconsiderate Behaviour'** some records could have been recorded in other categories in the above table as they have referred to specific behaviours such as drunkenness, playing loud music, throwing objects etc. Categorisation is based on the recording officer's interpretation and where some incidents refer to multiple categories they may have been recorded against inconsiderate behaviour as a catch-all. This could explain why it is always the most prevalent category in data returns.



4.13 The above graph shows that all three of the top categories have gradually decreased across the quarter and that the increased levels of begging/vagrancy seen last quarter has not been maintained.

4.14 The main issue being raised in this period is people refusing to leave licensed premises or transport such as bus and taxis when asked by staff. There has also been a lot of reports of aggressive individuals sometimes within premises or just on the street, this is a new trend that hasn't been seen that many reports previously and will be monitored to see if it continues in coming quarters. Reports of groups skateboarding or cycling and causing noise nuisance or intimidation have reduced this quarter as have reports of urban explorers. There were two reports of noisy groups thought to be filming music videos in residential areas.

Time/Days of the Week



4.15 In the current period incidents are more commonly reported on Saturdays and Fridays and lowest reporting levels occur on Sundays and Tuesdays. Levels are similar across the weekdays and then both peak and trough at the weekend.

4.16 The Reporting of all ASB incidents in the current period are shown in the above graph broken down by three hour periods across the day. Incident reports occur most frequently from late afternoon into the evening peaking between 21:00 - 23:59 and are at their lowest between 06:00 and 08:59.

Sector Policing

Charterhouse Street Mace Project Exchanging Places Roadshow

- 4.17 The main purpose of Exchanging Places Roadshow apart from the bike marking is that we educate the cyclist by inviting them to experience what it is like being seated in an HGV and seeing what the visibility is like from the drivers position as well as showing them all the blind spots which puts cyclist in danger.
- 4.18 The Exchanging Places scheme also brings together construction industry, haulage companies, council and Police Services working together to educate and support road safety.

Partnership Working with the City of London Corporation

- 4.19 **Reframe the Night:** is a joint operation between CoLP, CoLC, Safer Business Network (BCRP) delivering several engagement activities around safety within the night time economy. This is primarily focussed on the safety of women and girls with an additional focus on men looking at their own behaviours and actions. Reframe the Night is aimed at bystanders, aiming to start conversations, particularly amongst men and boys to stand up and challenge these behaviours when they see them and 'make these attitudes a thing of the past'. (See Appendix A for sample poster campaign).
- 4.20 **Street Safe:** is a further joint operation between CoLP and CoLC which provides a place for people to report any concerns around their safety within public spaces. The website can be used to report an area in which they feel unsafe and if there is a specific reason why they feel unsafe.
- 4.21 **Welfare and Vulnerability Engagement / Ask For Angela training:** which aims to increase the skills, knowledge, and confidence of those working in licensed premises focusing on identifying vulnerability and making appropriate interventions. This training is being promulgated further across NTE venues within the City and follows our launch event.
- 4.22 The above three initiatives have been funded following a successful CoLC / CoLP bid to the Home Office Safer Streets Fund.
- 4.23 **Op Reframe:** the Operation is a partnership approach to facilitate the NTE by asking partners to provide a reassuring high visibility presence, with an ultimate goal of making people feel safe in the City. This is in line with the Safer Streets Fund response to VAWG.
- 4.24 **Operation Rocotto:** will take place in May 2022. This follows our two previous successful high visibility engagement days in collaboration with the security industry (City Security Council). This will see both Police and Security working in partnership to deliver reassurance and engagement activities across the City.

Dedicated Ward Officers (DWO) and Licensing:

- 4.25 **Cluster Panels/Meetings:** Following our launch the panels in January 2022 the next set of meetings are scheduled to take place April/May. The first round of meetings were well represented by both our business and residential communities including Alderman and Common Councillors which highlighted a number of themes that the dedicated teams should look to address over time.
- 4.26 Panels such as this will eventually sit every three months in each cluster in the Square Mile. Panels will be made of up and exist to listen to the concerns of the local community, discuss possible solutions and set local policing priorities in a bid to make that area a safer place to live work and visit. The panels will be arranged and attended by the Dedicated Ward Officers for that cluster, to ensure they're part of the conversation about, and solution to, the policing issues raised. Areas raised included begging, establishing safe routes for our NTE community, ASB associated to skateboarders and cyclists.
- 4.27 **Cadets:** The City of London Police Volunteer Cadet Unit (VPC) relaunched in September 2021; it already has a cohort of 27 cadets aged between 13-18 years old and is gaining National attention/recognition. Cadets are welcomed from any background, social group, gender, ethnicity, or ability/disability. Thus far, cadets have been trained in first aid, drill, key communication skills and criminal justice/crime prevention. They have been deployed alongside officers and staff at several high-profile events and policing operations, with several more planned for 2022.
- 4.28 **Aldgate Crime prevention surgeries:** The Aldgate BID in partnership with DWO's, will deliver crime prevention surgeries that we will be held throughout the year within the BID footprint. These events will provide safety advice with particular focus on violence against women and girls and the feeling of safety.
- 4.29 **CoLP, CoLC and AWS Schools project:** Concluded, and considered a success (further projects likely to follow). Workshops introduced young people to the different types of digital careers available to them across policing and local government. The CoLP workshop was delivered online, and students given advice on how to obtain support, and report cyber bullying concerns to the police. Further, students were told about the different routes into policing, with some later expressing an interest to join at the end of the programme. Further meetings with Partners are planned in April (21st) and May (9th) to explore taking the project forward.
- 4.30 **Project Outreach:** Outreach events have targeted high footfall, diverse areas both inside and outside of the City. This has led to a significant increase in applications. Activities focussed toward Universities (those offering degrees in Policing and Criminology) – these were a mixture of in-person events and online sessions. Again, this has led to excellent feedback and an uptake in CoLP applications. Finally, there is sustained efforts at networking events and religious institutions to improve the diversity of applicants.

4.31 **Emerging community engagement:** DWOs continue to engage regularly with Afghan refugees being accommodated in the City. Considerable multi-agency and partnership working is still taking place, with CoLP providing support during the ongoing programme of 'Orientation Sessions,' that aim to provide assistance with adapting to life in the UK. Almost 250 presents were delivered to all children at Christmas 2021, following a collection organised by CoLP (and included donations from the City of London School for Girls and the Barbican/Golden Lane Community Group). Sport activities were also arranged by CoLP staff.

4.32 **Next steps:**

- Refresh mapping of communities (via Strategic Research & Analysis) using latest available datasets (e.g. Census data - 2022) to accurately reflect the current picture within the City.
- Operation Rocotto 3 will take place in May 2022. This follows two previously successful high visibility engagement days in collaboration with the City Security Council. Again, this will see both Police and Security working in partnership to deliver reassurance and targeted engagement activities across the City.
- Project Outreach in support of the wider Operation Uplift programme will continue to conduct targeted recruitment engagement utilising dedicated resources under the direction of a newly appointed senior leader at Chief Inspector level.
- Comprehensive review of AWS project, evaluating feedback from participating students and lessons learnt from the wider CoLP / CoLC / AWS project delivery.

5. Independent Advisory Scrutiny Group (IASG) Engagement

5.1 Work continues with the IASG in undertaking scrutiny of the force in such areas as stop and search and use of force. We are additionally currently recruiting to establish a youth independent advisory and scrutiny group which will both complement the existing work but will also add scrutiny and thinking from a different perspective.

5.2 IASG members continue to provide constructive advice to the Force in respect of both National and Local matters, including operations and events where there is propensity for community impact/tension/sentiment and on specific promotion and selection processes.

Conclusion

The City of London Police continues to use a variety of mechanisms to actively engage with the City Community, and also as part of its responsibilities as National Lead Force for Economic Crime. Members are asked to note the report.

Appendices:

Appendix A- Sample poster campaign for 'Reframe the Night'

Report co-ordinated by:

Matthew Mountford

T/Det Superintendent

Headquarters

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Committee(s): Strategic Planning and Performance Committee Police Authority Board Professional Standards and Integrity Committee	Dated: 5 May 2022 25 May 2022 25 May 2022
Subject: Update on Violence against Women and Girls (VAWG) activity	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1- People are safe and feel safe
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Commissioner of Police Pol 20-22	For Information
Report author: DCS Rebecca Riggs; Chief Inspector Carly Humphreys, Professionalism and Trust	

Summary

The purpose of this report is to provide an update for Members of the Strategic Planning and Performance Committee (SPPC), Police Authority Board (PAB) and Professional Standards and Integrity Committee (PSIC) on strategic progress made by the City of London Police (CoLP) in relation to Violence Against Women and Girls (VAWG)¹. Additionally, it provides some examples of work completed, and also areas for development over the coming months.

The report details current work at National, Regional and Local level and includes work ongoing with partners including the City of London Corporation.

Recommendation(s)

Members are asked to note the report

¹ This document uses the following Home Office definition of VAWG: “The term ‘violence against women and girls’ refers to acts of violence or abuse that we know disproportionately affect women and girls. Crimes and behaviour covered by this term include rape and other sexual offences, domestic abuse, stalking, ‘honour’-based abuse (including female genital mutilation, forced marriage, and ‘honour’ killings), as well as many others, including offences committed online.”

Main Report

Background

1. Members will be aware of the national and local focus on VAWG and detail of the background to this report was fully described in the previous report to your Committees in November 2021 and February 2022.

Current Position

Key Milestones since the last update (February – April 2022)

- The first VAWG [strategic-delivery-plan.pdf \(cityoflondon.police.uk\)](#) has now been published for CoLP and a copy is attached at Appendix A. A feedback email address VAWGFeedbackPublic@cityoflondon.police.uk has been set up for the public to provide their views on the plan as well as any ideas regarding what else they would like to see the CoLP doing in relation to Violence Against Women and Girls. This is a Year 1 report which will be refreshed annually. In line with the NPCC guidance, the Year 1 report will remain policing-centric, however Year 2 and Year 3 reports will focus much more on partnership work.
- Creation of an internal VAWG Action Plan which outlines tactical delivery, demonstrates what progress has been made to date, how performance will be scrutinised and provides an objective RAG grading² for the progress made in each area of activity. A baseline assessment of performance has been completed to track improvements over time, scrutiny of this will be achieved within our monthly Rebuilding Trust and Confidence meetings Chaired by Assistant Commissioner Betts.
- Establishment of a regional working group alongside the British Transport Police and the Metropolitan Police Service.
- Creation of a draft VAWG Problem Profile which provides data analysis regarding thematic areas; such as crime types, locations, offender types and temporal analysis. It provides recommendations regarding how we can improve our policing response and where resources would be most effectively utilised to tackle VAWG.

National

2. Policing progress concerning VAWG continues with pace nationally. All forces remain in close working alignment with the NPCC (National Police Chiefs Council) against the National Framework for Delivery (Year 1). Regular weekly NPCC taskforce meetings bring together strategic and tactical leads to share working practices and disseminate national headlines.

² RAG denotes a 'Red, Amber, Green' grading of progress. This grading has been awarded through an initial internal benchmarking process. For future quarterly benchmarking processes, this will be done with the IASG to ensure that there is external scrutiny.

3. Along with all forces nationally, the CoLP has submitted its VAWG Strategic Delivery Plan, written in consultation with the City of London Corporation (CoLC) and internal stakeholders, and its VAWG Action Plan to the NPCC. These will formulate national performance benchmarking for VAWG and promulgate best practice.
4. The CoLP Commissioner and Det Chief Supt Head of Professionalism and Trust have met with DCC Maggie Blyth (NPCC VAWG lead) this month and discussed a number of opportunities for CoLP to enhance national VAWG delivery, such as:
 - Opportunities for CoLP secondments to the NPCC to work on the VAWG portfolio.
 - Supporting the national online VAWG Problem Profile using National Fraud Intelligence Bureau (NFIB) data sets.
 - Developing upon City business relationships, such as licensing and hospitality, which could have national influence.
 - Learning from *good industry practice* within the National Economic Crime Victim Care Unit (NECVCU) as to whether this could be replicated for enhanced victim care within VAWG offences.

Regional

5. In addition to our national work with the NPCC, the CoLP has now established itself within a regional working group alongside the Metropolitan Police Service and the British Transport Police. The aims of this group are to share best practice, combine our efforts for joint initiatives and to provide updates to the NPCC Working Group. Although chiefly aligned to VAWG, this working group will also focus on broader Trust and Confidence workstreams, thereby providing a wider benefit towards other policing related issues and organisational learning, such as race and diversity.
6. An additional relationship has been established with Avon and Somerset Police who will complete a peer review on our Internal VAWG Action Plan. This will provide greater scrutiny on our benchmarking process and provide immediate opportunities to share best practice.

Local

7. Since our most recent update to members in February 2022, the CoLP has continued to develop work to tackle VAWG by delivering sustainable change, as outlined in the key milestones. Both the Strategic and Tactical leads for the Professionalism and Trust portfolio have now met with our Independent Advisory Scrutiny Group (IASG) to explore working together opportunities.
8. The following updates build upon our commitments outlined in the February 2022 report, therefore these updates reflect additional pieces of work rather than a duplication of work mentioned in previous reports.

However, the CoLP will provide VAWG Action Plan performance updates to the Police Authority Board to ensure that they have oversight of activity underway.

9. In relation to the 3 National objectives some activity on each of these to date is described in Appendix B.

Governance

10. The City of London Police's strategic and tactical delivery on VAWG is being scrutinised at a national and local level, as follows:
 - The CoLP Renewing and Rebuilding Trust and Confidence Board, chaired by Assistant Commissioner Paul Betts, is driving progress against the delivery framework objectives which we have set out in our Strategic Delivery Plan under each of the three pillar objectives. To achieve this, the CoLP has a Tactical Action Plan that sets out the activities which will take place to deliver against these objectives, this Action Plan will also be sent to the HMICFRS³ for independent review.
 - Achievement will be scrutinised through independent review of our performance metrics to ensure that there is objectivity and transparency. This will take the form of regular consultation with our Independent Advisory and Scrutiny Group (IASG) and more formally, through the Police Authority Board (PAB) and Professional Standards and Integrity Committee (PSIC). Key milestones and significant activity will also be highlighted to PAB/ PSIC and also shared with partners.
 - The CoLP will also regularly feed into a number of NPCC National Working Groups to share learning and best practice amongst all other Police Forces in England and Wales and the aforementioned regional Trust and Confidence Strategic Working Group with the Metropolitan Police Service and the British Transport Police.
 - We will regularly review our Strategic Delivery Plan to ensure that it includes new recommendations from the NPCC as they are announced.

Conclusion

11. The CoLP continues to work in partnership with the City of London Corporation to enhance the City of London's response to VAWG. This report has highlighted some of the initiatives which have taken place to support this partnership and also our wider delivery of the NPCC VAWG strategy.

³ Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) independently assesses the effectiveness and efficiency of police forces and fire & rescue services – in the public interest. [HMICFRS - Home \(justiceinspectors.gov.uk\)](https://www.justiceinspectors.gov.uk)

12. All the work noted in this report contributes to our new Policing Plan, in particular our Operational Priorities to 'Keep those who live, work, and visit the City safe and feeling safe' and to 'Put the victim at the heart of everything we do'.

Appendice(s)

Appendix A- Copy of the Strategic Delivery Plan

Appendix B- Highlights of activity under the 3 NPCC National Objectives

Appendix C – Reframe the Night poster campaign

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Strategic Delivery Plan for Violence Against Women and Girls (2022-2023)



City of London Police – Violence Against Women and Girls Strategic Delivery Plan (2022-2023)

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Foreword – From the City of London Police Commissioner

The murder of Sarah Everard by a serving police officer and other tragic deaths, such as those of Bibaa Henry and Nicole Smallman, Julia James, Gracie Spinks, Sabina Nessa and Bobbi-Anne McLeod have understandably sent shockwaves across UK policing and impacted upon the trust and confidence felt amongst the public.

We, along with all forces, have recognised the need to rebuild trust, raise standards and ensure that there is a positive, supportive, and healthy culture to demonstrate that any violence against women and girls is not acceptable, will not be tolerated and will be relentlessly challenged.

Our commitment to tackling VAWG and rebuilding trust and confidence is also fully reflected in our new Policing Plan. We have listened to our communities, our officers and staff, and have reflected this feedback into our new vision and values. A vision that sees us trusted by communities to deliver policing with professionalism, integrity and compassion.

This VAWG Strategic Delivery Plan outlines the work we will do to unremittingly tackle violence against women and girls, and to rebuild trust and confidence by ensuring we police at all times to the highest professional standards.

Angela McLaren

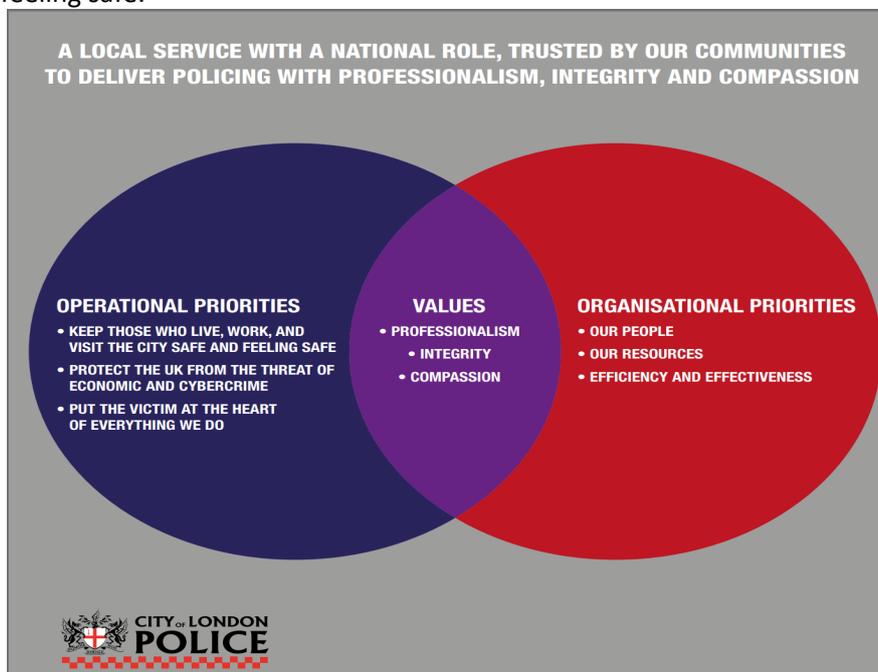


Context

The term ‘Violence Against Women and Girls’, often referred to as VAWG, relates to acts of violence or abuse that disproportionately affect women and girls. Crimes and behaviour covered by this term include rape and other sexual offences, domestic abuse, stalking, harmful practices (including female genital mutilation and forced marriage) as well as many others. These areas include offences and behaviours committed both in person and online.

The City of London Police (CoLP) has prioritised the delivery of a new strategy, in line with the National Police Chiefs’ Council (NPCC) framework. The National framework aims to coordinate and standardise the policing of violence against women and girls. The CoLP has already made great progress in this area, however our work will continue to deliver on the framework whilst also remaining bespoke to the needs of the City. How we will achieve this is outlined in this Strategic Delivery Plan.

Our new Policing Plan (2022-2025) [Policing Plan | City of London Police](#) wholly reflects the force’s commitment to VAWG and Rebuilding Trust with our communities. The Policing Plan has our values at its core, *Professionalism, Integrity* and *Compassion*, these are integral to our internal priority to create a culture of inclusion and high professional standards. These will ensure that our workforce is engaged, delivers the best service possible to the public and that they are also supported to report and challenge wrongdoing. Indeed, we are clear that we need to do even more to deal with violence against women and girls, and we recognise the direct link here with rebuilding trust in police standards. Whilst externally, we will remain committed to bring together the work of our partner agencies, in particular, optimising our close working relationship with the City of London Corporation (CoLC)¹, to develop and support a coordinated response to keep those who live, work and visit the city safe and feeling safe.



¹ The CoLC already has a VAWG Strategy in place (2019-2023) which we will remain closely aligned to and assist to support their vision that the “Square Mile is free from Violence against Women and Girls (VAWG) and is a place that is safe for everyone to live, work, learn and visit”. [City of London Violence Against Women and Girls Strategy](#)

In line with the NPCC, Year 1 of this Strategic Delivery Plan has a prime focus on areas of policing which can help us improve immediately, whilst also highlighting our integral working relationship with the CoLC, particularly around our commitment to creating Safer Spaces. Indeed, we have already delivered on a number of initiatives with the CoLC, such as the implementation of our Ask for Angela campaigns across a number of licensed premises in the City, and the establishment of Night Safety Hubs for women and girls through the 2021 Christmas and New Year period.

Moving forwards, Years 2 and 3 of our plan will focus on the wider community and partnership approaches needed to deliver sustainable change. Correspondingly, this plan will focus on the activities of the CoLP, however it will evolve in time to include, in more detail, our close work with the CoLC and wider partners.

This strategy is based upon three pillars:

1. Building Trust and Confidence:

This pillar focuses on our commitment to improve internal and external trust and confidence. Our Policing Plan outlines our operational priority to keep those who live, work, and visit the city safe and feel safe. Consequently, we must do more to earn the trust and confidence of our communities, in particular that of women and girls. To achieve this, we must ensure that our officers and staff uphold the highest professional standards.

2. Relentless Perpetrator pursuit:

This pillar focuses on our ongoing commitment to bring more perpetrators of violence against women and girls to justice, working with partner agencies as a “whole system” response. This also includes work to reduce case attrition and also to address the concerns and experiences of the victims.

3. Creating Safer spaces:

This pillar focuses on protecting women and girls in public spaces, at home and online. We will continue to work closely with our partners and in particular the CoLC to protect women from victimisation in these spaces.

This Strategic Delivery Plan sets out specific numbered actions under each of the pillars. These actions are individually tracked through our force’s internal ‘VAWG Tactical Action Plan’ which outlines what we have already achieved and what our future action will be to improve trust and confidence. Recognising the need to balance public concern with achievable activities, we have prioritised some actions for immediate implementation, whilst others will continue with the support of partners and community groups in the coming weeks and months.

Building Trust and Confidence

An overview of the framework for delivery for this pillar, commits the City of London Police to: -

1. Respond unequivocally to allegations of police perpetrated abuse, learning from mistakes and best practice.
2. Challenge and address sexism and misogyny within policing.
3. Involve women and girls, including those who are Black and minoritised, in scrutiny of force VAWG performance and practice.
4. Collect consistent local and national information on the availability of specialist VAWG investigators to build the right specialist capability and capacity.

The legitimacy and effectiveness of UK policing is built upon our relationship with the public, nationally this remains under strain, particularly amongst Black people and with women. Externally, we recognise that by improving all our community relationships, this will enhance our knowledge regarding any abuse or discrimination which is hidden or disguised as cultural or religious practice. Correspondingly, we will further reach out to our business, residential and visitor populations, in particularly women and girls who are black and minoritised to involve and empower them in our work to rebuild trust and confidence in policing. This not only includes our ability to gain a better insight from these communities, but also to ensure that we reflect on this in how we design our policing activities, training and processes.

Two internal forums have been hosted by the previous and current Commissioners, the feedback from our officers and staff supported our honest recognition that misogynistic attitudes and behaviours that exist in society, will also exist within policing too. In response, we remain committed to upholding the highest professional and personal standards, this is achieved through our Codes of Ethics and Standards of Professional Behaviour becoming a key priority in our strategy to improve trust and confidence, internally and externally.

Internally, the City of London Police is actively leading several initiatives to create a supportive workplace culture. Much of this work is captured within the organisations' Equality and Inclusion Strategy which can be broken down into individual workstreams, such as:



Recruiting the right people with the right skills plays a pivotal role in the growth of the organisation and further improving upon our culture. To ensure the effectiveness of these

initiatives, subsequent reporting cycles will be built into the Equality and Inclusion Strategic Board to monitor progress and delivery. This Plan also concentrates on how we create a supportive workplace culture for women who work for the City of London Police.

We have already prioritised and undertaken: -

- A series of Corporate Plan workshops to collectively explore our future values, vision and ambition.
- To continue to promote and encourage our staff to step forward and raise concerns through our well-publicised, internal and external reporting mechanisms. This will not only encourage reporting but will assist to ensure that all officers and staff understand the force's commitment to VAWG.
- A direction for our Professional Standards Department (PSD) and HR (Human Resources) to complete an urgent review of cases over the past 10 years (for significant allegations, the review period went beyond 10 years), against our officers and staff. This will ensure that those who raise concerns are being properly supported, investigations are comprehensive and sanctions in relation to violence against women and girls, reflect the seriousness of the misconduct.
- The request for a peer review of the above process by the Metropolitan Police Service (MPS) to ensure transparency, PSD will also be adopting the MPS' comprehensive review process to ensure that there is a consistent approach across London.
- A strategy to communicate immediately, clearly, and then frequently that misogynistic, sexist and sexualised behaviour will not be tolerated by anyone in policing.
- Considerable progress towards being a more inclusive organisation, of note we have launched our Equality and Inclusion Strategy "Policing the Square Mile 2020 – 2025" with a subsequent reporting cycle to monitor performance and drive progress.
- Promotion of the use of processes and mechanisms open to staff and officers to raise concerns, whether it be a grievance or bullying and harassment. In this way we seek to encourage individuals to come forward so that we can support them and deal accordingly with the concerns raised.

Despite the above, we are aware that there are groups that still do not feel they belong and there is more to do to deliver the step change in culture we want to see.

Therefore, we will: -

- Seek perspectives and reflect upon the findings of our staff surveys and focus groups to address any disparity of outcomes across protected characteristics; specifically gender and race which will help us to direct our progress on improving organisational culture.
- Reinvigorate our commitment to the Police Code of Ethics and embed this at all levels to demonstrate to our workforce that we support a culture that is inclusive, both for our staff and the people we serve.
- Commence Leadership programmes and annual values, standards and ethics workshops early in 2022. This will underline the importance of everyone being more open and alert to challenging inappropriate behaviour or actions that undermine our culture.
- Establish and continuously improve our strong 'call it out' culture (including a focus on the importance of men being upstanders not bystanders), supported by safe

processes for reporting inappropriate behaviours, and swift interventions where necessary.

- Establish a continual programme of listening circles with women from across policing, thereby seeking to involve women in designing solutions.
- Establish regular independent scrutiny of force performance in responding to VAWG which will be aligned to internally audit our activity.
- Constantly seek to expand the reach of communications, including through engagement with third sector organisations that are working closely with different groups of women and girls.
- Provide clear and evidenced examples of how this involvement is used to change and improve practice, including incorporating the voices of those with lived experiences into training and raising awareness across the organisation.

Relentless Perpetrator Pursuit

An overview of the framework for delivery for this pillar, commits the City of London Police to: -

1. Relentlessly pursue and actively manage and target the most dangerous and prolific offenders.
2. Make better use of police powers to protect women and girls, and to manage and disrupt perpetrators.
3. Adopt a trauma aware approach at all levels, to better support victims through the criminal justice process and focus on evidence led prosecutions where appropriate.
4. Enhance supervision of VAWG investigations.

We are taking a whole system approach to targeting perpetrators, working across London with the CoLC, relevant local authorities, healthcare, education and other law enforcement agencies.

Nationally, there is a deeply felt, and long-standing concern from women, that the criminal justice system does not protect them when they are victims of violent or sexual crimes. As an organisation we will strive to improve our detection rates for key crimes including rape, serious sexual offences, stalking and harassment. We are also working hard with the Crown Prosecution Service (CPS) to deliver the best criminal justice outcomes.

Currently, there is a lack of consistent method for the police or the criminal justice system to identify how it is performing in relation to VAWG related crime. This does present challenges in reporting on charge and prosecution rates at a force and national level. The HMICFRS recognise that there is a need for a defined set of parameters that can be used consistently by all forces, this will establish whether improvements are being made, and which approaches taken are the most effective. In the meantime, we will focus our future reporting on criminal offences of a sexual and violent nature which have been perpetrated against women and girls.

We have already prioritised and undertaken:

- A review to ensure each frontline police officer has received the appropriate skills and training to use the full extent of their powers to investigate, and where an offence has occurred, bring the perpetrator to justice. Vulnerability training is now

mandatory for all frontline officers and staff, the current training package has recently been redeveloped to include a greater focus on child protection. This will be continually refreshed to ensure that officers and staff are trained to appropriately respond to a wide range of offences, including behavioural crimes which are committed against women and girls.

- Domestic Abuse processes are well established in the organisation, they include the recent introduction of a '20 Point Plan' and mandatory supervisor attendance at all Domestic Abuse incidents to enhance opportunities for evidence led prosecutions. This has been shared nationally as best practice.
- In accordance with the National Police Chief's Council (NPCC) direction, the CoLP aligns its activity to the National Vulnerability Action Plan (NVAP). This means that VAWG offences are treated as a higher priority alongside other areas of vulnerability. This is underpinned at the monthly Tactical Tasking and Coordination Group (TTCG) which ensures that there is appropriate operational delivery across all vulnerability strands, based upon threat, harm and risk.
- CoLP has secured some significant convictions and sentences for sexual offences. Such as, the sentencing of a male to 108 months imprisonment in September 2021 for rape and kidnap offences. This underlines the importance of our committed working relationship with the London RASSO (Rape and Serious Sexual Offences) CPS lead to maximise all available opportunities for prosecution.

We will: -

- Look to report on prosecution rates across a breakdown of sexual offences by requesting a disaggregation of data currently combined with that of the MPS to provide us with a detailed reporting picture.
- Intensify work with our licensed premises to reduce incidents of drink spiking, working with national best practice from many other forces who have also seen an upward trend in reporting.
- Monitor referrals to appropriate specialist victim support services, taking action to ensure these are conducted consistently and quickly.
- Ensure force well-being strategies include an awareness of the effect of trauma on police officers and staff.
- Strive to increase the number of perpetrators brought to justice for violence against women and girls.
- Actively manage known perpetrators to reduce the prevalence of violent offending against women and girls by using a wide range of tactics. With the added aim that this will improve the level of trust and confidence which our City residents, workers and visitors have in how we respond to all forms of violence against women and girls.
- Improve training to frontline officers on Stalking and Harassment to ensure that all communities, including workers feel safe in the City.
- Improve processes and victim care across the criminal justice system to improve outcomes.
- Work to reduce the likelihood of women and girls becoming repeat victims.
- Increase women's confidence in the police, and in doing so, improve the reporting of crimes which disproportionately affect women and girls in London. To achieve this, training for officers and staff of all ranks will need to ensure that the importance of VAWG and the severity of its impact is widely discussed and understood.
- Intensify work to tackle sexual misconduct and domestic violence by officers and staff.

Safer Spaces

An overview of the framework for delivery for this pillar, commits the City of London Police to: -

1. Immediate and unequivocal prioritisation of VAWG.
2. Focus prevention work on the most dangerous online, private, and public spaces.

We are working alongside the CoLC and other partners to create safer spaces, so that women and girls both are safe and feel safe. We will achieve this by increasing our understanding of hotspot locations where women and girls feel unsafe, correspondingly we will work with the CoLC and partners to design-in safety, whether this is in public spaces, at home or online.

We recognise the need for greater comprehension regarding the data and evidence in relation to the challenges presented by VAWG. Consequently, we are working to improve the detail around our current force intelligence picture, in addition to how this compares across the national landscape.

We have already: -

- Commissioned and resourced the creation of an intelligence profile, considering all information available over a 3-year period to identify where violent criminality tends to occur.
- Completed Hot Spot data analysis over a 3-year period to identify where violent criminality tends to occur.
- We have increased our visibility by patrolling public spaces and night-time economy venues to ensure people are safe and feel safe.
- Included an officer from Public Protection within the previously held Night Safety Hubs to provide specialist support to any female reporting a concern.
- Launched a project with CoLC to re-introduce Police Boxes into the Square, to provide a network of physical safe havens and emergency contact points.
- Successfully refreshed the 'Ask for Angela' campaign to raise awareness regarding how all employees at hospitality venues, can help tackle behaviours which make women and girls feel unsafe and provide them with immediate support.
- Piloted a new online tool called StreetSafe (launched by the Home Office and National Police Chief's Council) which enables the public, particularly women and girls, to pinpoint an area within the city where they feel unsafe and asks them to explain why. Thereby enabling us to identify how we can work with partners to make these areas safer.

In addition to the above we will: -

- Build VAWG into our priority plan, and into internal and external policies and processes, ensuring appropriate equality impact assessments are conducted and in place.
- Embed the new Serious Violence Duty into partnership VAWG plans.
- Develop and implement a communications and engagement strategy to set out how this prioritisation will affect police behaviours and practice, and how it will be monitored.

- Use profiles to target prevention activity, inform offender management, and increase the understanding and needs of our most vulnerable victims.

Governance

The CoLP Renewing and Rebuilding Trust and Confidence Board, chaired by Assistant Commissioner Paul Betts, will drive progress against the delivery framework objectives which we have set out in this plan under each of the pillars. To achieve this, the CoLP has a Tactical Action Plan that sets out the activities which will take place to deliver against these objectives, this Action Plan will also be sent to the HMICFRS² for independent review.

Achievement will be scrutinised through independent review of our performance metrics to ensure that there is objectivity and transparency. This will take the form of regular consultation with our Independent Advisory and Scrutiny Group (IASG) and more formally, through the CoLC Police Authority Board (PAB). Key milestones and significant activity will also be highlighted to PAB and also shared with partners.

The CoLP will also regularly feed into a number of NPCC National Working Groups to share learning and best practice amongst all other Police Forces in England and Wales. Similarly, the CoLP is also engaged in a regional Trust and Confidence Strategic Working Group with the Metropolitan Police and the British Transport Police.

We will regularly review our Strategic Delivery Plan to ensure that it implements new recommendations from the NPCC as they are announced.

Next Steps

Using a Nationally agreed performance framework, we will report against the progress of our crucial work to rebuild trust internally and externally. We will document this through our quarterly business plan updates which are published, as well as through a range of other mediums to enable independent oversight and scrutiny.

Feedback

We value the views of our communities and partners on this plan, you can provide feedback online at VAWGFeedbackPublic@cityoflondon.police.uk. We want to hear views on the plan as well as any ideas regarding what else you would like to see the City of London Police doing in relation to Violence Against Women and Girls.

² Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) independently assesses the effectiveness and efficiency of police forces and fire & rescue services – in the public interest. [HMICFRS - Home \(justiceinspectors.gov.uk\)](http://justiceinspectors.gov.uk)

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Appendix B- VAWG Update to May SPPC, PSIC and PAB

Highlights of progress against NPCC objectives

NPCC Objective 1-Improve Trust and Confidence in Policing

This area focuses on our commitment to improve internal and external trust and confidence. Our new Policing Plan outlines our operational priority to keep those who live, work, and visit the City safe and feel safe. Consequently, we know that we must do more to earn the trust and confidence of our communities, in particular that of women and girls. To achieve this, we must ensure that our officers and staff uphold the highest professional standards.

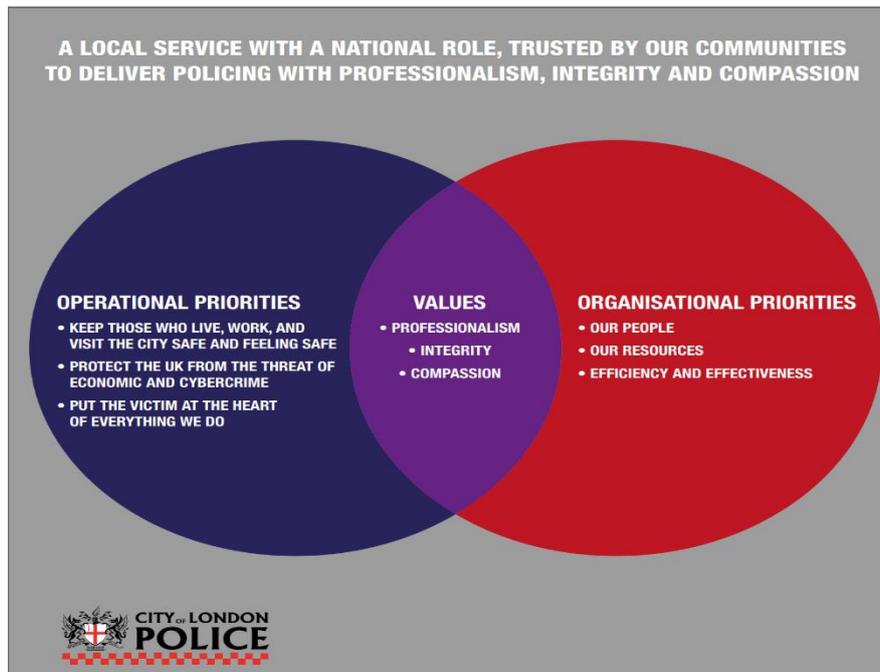
Highlights:

- Our Professional Standards Department (PSD) continue to review live, recent and historical cases to ensure that all concerns raised have been dealt with appropriately and updates on this are being provided to the Professional Standards and Integrity Committee. A peer review of cases with the Metropolitan Police will continue, not only to ensure absolute objectivity, but also to ensure that any organisational learning from each force is recorded and promulgated.

The PSD Counter Corruption Unit (CCU) has reported that the majority of concerns raised to them have been through direct contact rather than by anonymous reporting, this could indicate that employees are gaining confidence in the process of raising concerns.

- A number of PSD inputs regarding VAWG will be delivered by the dedicated Engagement Officer. This activity is designed to capture as many employees as possible through Management courses, probationer and transferee inductions and more general departmental inputs. A particular focus for these inputs is the organisation's Social Media Policy and will also refer to recent national misconduct cases.
- The PSD has reviewed the recommendations of the Operation Hotton Report¹ and responded with an overall strategic response regarding how these recommendations will be adopted for CoLP. This strategy has been circulated to our internal Rebuilding Trust and Confidence Strategic Board for comment and an update on this will be provided to the Professional Standards and Integrity Committee. The PSD will continue to review national organisational learning and promulgate recommendations which are appropriate for CoLP.
- Our new [Policing Plan | City of London Police](#) (2022-2025) intentionally puts victims at its heart and has a strong focus on creating a culture of equity and belonging.

¹ [Operation Hotton Learning report - January 2022.pdf \(policeconduct.gov.uk\)](#) – the report makes 15 recommendations for the MPS to change policing practice following an IOPC investigation which found evidence of discrimination, misogyny, harassment and bullying involving officers predominantly based at Charing Cross Police Station.



This plan has now been published internally and externally. Furthermore, our own comprehensive internal communications strategy will ensure that all of our workforce understand what the priorities and values mean to them.

- On the 11th March 2022, Commissioner Angela McLaren opened the Force’s first ‘Our People’ conference which welcomed around 150 Police Officers and Staff at managerial level from across the organisation. The Force’s new values were introduced (‘Compassion’ has now joined ‘Integrity’ and ‘Professionalism’) with an emphasis on compassion, which applies not only to how we interact with the people we serve, but also in how we treat one another within the organisation. A number of important areas around Equality and Inclusion were the focus of the day, in particular VAWG, Race and Ethnicity, with a focus on leaders reflecting on their personal responsibility to make CoLP a more inclusive organisation. Feedback from the event is that this was hugely successful and impactful.

NPCC Objective 2- Relentlessly Pursue Perpetrators

This area focuses on our ongoing commitment to bring more perpetrators of violence against women and girls to justice, working with partner agencies as a “whole system” response. This also includes work to reduce case attrition and to address the concerns and experiences of the victims.

- Public Protection are undertaking a capability review to ensure that the CoLP’s operational response meets the public calls for service regarding VAWG. This piece of work not only seeks to examine specialist 24/7 availability but also wider training requirements for the whole workforce.
- To ensure that the highest investigative standards are maintained within VAWG investigations, there is now a process for a monthly dip-check of investigations

completed by the Crime Scrutiny Board and an independent Detective Chief Inspector from the Professionalism and Trust department. This also enables any organisational and individual learning to be captured and remedies implemented at the earliest opportunities.

- Public Protection are completing a review on offender management processes, in particular regarding managing offenders' post-conviction who are subject to civil orders, such as Domestic Violence Protection Orders and Stalking Protection Orders. This will support the Government's new Tackling Domestic Abuse Plan² and outline our approach in tackling domestic abuse through prioritising prevention, supporting victims, pursuing perpetrators and working with the CPS to build a stronger system.

NPCC Objective 3- Create Safer Spaces (*this section has been written in consultation with the City of London Corporation)

This area focuses on protecting women and girls in public spaces, at home and online. We will continue to work closely with our partners and in particular the City of London Corporation (CoLC) to protect women from victimisation in these spaces.

Highlights:

- Following on from the Home Office funding award to raise awareness regarding the 'Street Safe' application³, the renewed advertisement campaigns have now gone live. The next stage of this campaign will be to review the data collected over the coming months, and whilst working with the CoLC, identify what improvements can be made to increase feelings of safety in the City.
- The funding also received for the 'Reframe the Night' campaign⁴ (please see graphics in Appendix C) has provided the opportunity for joint advertisement with the CoLC around the City. So far, the campaigns on social media and within City of London train stations, have resulted in 9.3 million adult impressions through JCDecaux signage. The campaigns remain live, and Members will be updated in the September report.
- The Home Office funding received to enhance the 'Ask for Angela' campaign, through provision of Welfare And Vulnerability Engagement (WAVE) training to 100 licensed venues across the City remains underway. This will continue to ensure that trained staff at those venues are able to prevent and respond to incidents of VAWG.

² [Tackling Domestic Abuse Plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/tackling-domestic-abuse-plan)

³ This is a website ([StreetSafe | City of London Police](https://www.street-safe.com/)) which encourages people to report any areas they feel unsafe and reasons why they feel unsafe, for example poor street lighting. This will enable both the Police and Corporation to address the issues raised.

⁴ This is an awareness campaign largely delivered to the public in the City to challenge myths and misconceptions around sexual harassment. The emphasis will be on men to think about changing their behaviour, rather than putting the responsibility on women to change their behaviour to keep themselves safe. Please note that in the previous report this was entitled 'Good Night Out', however the terminology has now changed.

- CoLP continue to work alongside Victim Support to deliver Safety in the City presentations to around 600 employees from businesses such as UBS, Lloyds of London, Broadgate security, 22 Bishopsgate and Savills. The sessions highlighted the City of London's response to VAWG, including information on what men can do and how they can change their behaviour to help make women feel safer. Reframe the Night and Street Safe are both promoted during these presentations. The businesses provided positive feedback and requested further sessions.
- The CoLP launch of 'Op Reframe' is on the 28th April 2022 and will host a partnership safety hub for women and girls near to Liverpool Street Station on a monthly basis. Looking further ahead⁵, the CoLP has commissioned the development of mobile digital 'police boxes' and will in the longer term provide mobile 'safe havens' which can be used in particular by women and girls during night time economy peak hours.

⁵ Estimated implementation date is 2024.

**“ If they go
out dressed
like that,
what do
they
expect? ”**

**Whatever we
choose to wear,
we deserve
and expect
your respect.**

Let's make these attitudes a thing of the past.

cityoflondon.gov.uk/reframethenight



FOR SAFER NIGHTLIFE



“ He can’t help it, he’s always a bit handsy when he’s had a few ”

If you can have a drink without assaulting anyone, so can he.

Let’s make these attitudes a thing of the past.

cityoflondon.gov.uk/reframethenight



FOR SAFER NIGHTLIFE



CITY OF LONDON



“ We used to have fun at work, but you can't say anything these days ”

Fun for who? If people are your punchlines, it's time to change the script.

Let's make these attitudes a thing of the past.

cityoflondon.gov.uk/reframethenight



FOR SAFER NIGHTLIFE



CITY OF LONDON



**“It’s none
of my
business,
she’s
probably
fine”**

**If you see
someone being
harassed,
check in and
show you care.**

Let’s make these attitudes a thing of the past.

cityoflondon.gov.uk/reframethenight



FOR SAFER
NIGHTLIFE



CITY
OF
LONDON



**“ I heard
she made it
all up for
attention ”**

**Many don't
speak up about
sexual violence
from fear of not
being believed.
Are you safe to
share with?**

Let's make these attitudes a thing of the past.

cityoflondon.gov.uk/reframethenight



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