



Police Committee

Date: THURSDAY, 14 APRIL 2016
Time: 11.00 am
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members: Deputy Henry Pollard (Chairman) Alderman Ian Luder
Deputy Douglas Barrow (Deputy Chairman) Helen Marshall
Nicholas Bensted-Smith Deputy Joyce Nash
Mark Boleat Deputy Richard Regan
Simon Duckworth Lucy Sandford
Lucy Frew Deputy James Thomson
Alderman Alison Gowman

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Lunch will be served in Guildhall Club at 1PM
NB: Part of this meeting could be the subject of audio or video recording

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**
 - a) To agree the public minutes and summary of the meeting held on 25 February 2016. (Pages 1 - 8)

For Decision
 - b) To receive the draft minutes of the Performance and Resources Management Sub Committee meeting held on 24 February 2016 (Pages 9 - 14)

For Information
4. **OUTSTANDING REFERENCES**

Report of the Town Clerk.

For Information
(Pages 15 - 16)
5. **STANDARD ITEM ON THE SPECIAL INTEREST AREA SCHEME**
 - a) Community Engagement Update (Pages 17 - 26)

Report of the Commissioner of Police.

For Information
 - b) Equality and Inclusion Update (Pages 27 - 32)

Report of the Commissioner of Police.

For Information
 - c) Any Other Special Interest Area Updates

For Information
6. **REPORTS OF THE CHAMBERLAIN**
 - a) Revenue Budget 2016/17 Update (Pages 33 - 36)

For Decision
 - b) Internal Audit Review of Insolvency (Pages 37 - 54)

For Information

7. **UPDATE REPORT - CITY ATTRO**
Report of the Director of the Built Environment.

NB: This report will also be considered by the Policy and Resources Committee this day and by the Planning and Transportation Committee on 26 April 2016.

For Information
(Pages 55 - 74)

8. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

9. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

10. **EXCLUSION OF THE PUBLIC**

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

Part 2 - Non-Public Agenda

11. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 25 February 2016.

For Decision
(Pages 75 - 80)

12. **RING OF STEEL COMPLIANCE AND STABILISATION PROJECT**

Report of the Commissioner of Police.

For Decision
(Pages 81 - 90)

13. **ANNUAL REVIEW OF TRAVEL CONCESSION AGREEMENT FOR POLICE OFFICERS**

Report of the Commissioner of Police.

For Decision
(Pages 91 - 96)

14. **MENTAL HEALTH AND CUSTODY**

Alderman Alison Gowman will provide a verbal update.

For Information

15. **COMMISSIONER'S UPDATES**

Commissioner to be heard.

16. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

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

POLICE COMMITTEE

Thursday, 25 February 2016

Minutes of the meeting of the Police Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Thursday, 25 February 2016 at 11.00 am

Present

Members:

Deputy Henry Pollard (Chairman)	Nicholas Bensted-Smith
Deputy Douglas Barrow (Deputy Chairman)	Helen Marshall
Mark Boleat	Deputy Joyce Nash
Simon Duckworth	Deputy Richard Regan
Lucy Frew	Lucy Sandford
Alderman Alison Gowman	Deputy James Thomson
Alderman Ian Luder	

In Attendance

Officers:

Ian Dyson QPM	- City of London Police
Commander Chris Greany	- City of London Police
Hayley Williams	- City of London Police
Oliver Bolton	- Town Clerk's Department
Gregory Moore	- Town Clerk's Department
Alex Orme	- Town Clerk's Department
Amanda Thompson	- Town Clerk's Department
Chris Harris	- Chamberlain's Department
Peter Kane	- Chamberlain
Steve Telling	- Chamberlain
Richard Jeffrey	- Comptroller and City Solicitor's Department
Steve Presland	- Transportation & Public Realm Director
Will Wright	- City Surveyor's Department

1. APOLOGIES

There were no apologies for absence.

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

There were no declarations of interest.

3. MINUTES

3.1 To agree the public minutes of the meeting held on 21 January 2016.

RESOLVED – that the minutes of the meeting held on 21 January 2016 be agreed as a correct record subject to the following amendments:

Members Present – Edward Lord to be recorded as ‘In Attendance’ and not a ‘Guest’.

Minute 1 – Apologies

The removal of apologies from Commander Chris Greany as the giving of apologies isn’t applicable to officers.

Minute 11 – Anti-Terrorism Traffic Regulation Order – minute reworded below

The Committee considered a report of the Director of the Built Environment proposing the introduction of an Anti-Terrorism Traffic Regulation Order (ATTRO) in the City on a permanent basis.

Members were informed that details of how the Order would operate were still being discussed with Transport for London (TfL) and as a consequence it was suggested that the proposal Order be approved in principle subject to the clarification of certain legal aspects.

The Committee questioned whether, in considering the duty to act in accordance with the European Convention on Human Rights, legal advice had been obtained, and whether an equality impact assessment had been carried out. They were informed that the appropriate processes had been followed and that external legal advice had been obtained, which was very supportive. The Committee noted that they would like to see further details of the legal advice, which should be provided as soon as possible. The Committee questioned whether the rank of the police officer required to make the decision on the instigation of the ATTRO was appropriate, and noted that they would like to see the draft protocol. The Committee also noted that members had a number of drafting points to suggest on the draft order.

The Committee was advised that in the event of an ATTRO being agreed and TfL agreeing to their roads in the City being included in the City ATTRO, and/or any neighbouring traffic authorities agreeing to their boundary roads with the City being included in the City ATTRO, (a) the Comptroller and City Solicitor or his delegated officer would be authorised to enter into any necessary agreements under Section 101 of the Local Government Act 1972 (or other joint working agreements) with TfL and/or neighbouring traffic authorities; and (b) the Director of the Built Environment or her delegated officer would be authorised to amend the ATTRO to include TfL roads and/or boundary roads with neighbouring traffic authorities, as the relevant traffic authorities might agree.

The Committee noted that any further steps requiring approval would need to return for decision and a report on the use of the ATTRO would be submitted to Members annually.

After further discussion a vote was cast. This resulted in two Members voting against the proposal.

RESOLVED – That subject to provision of, and Members being comfortable with, the legal advice, and subject to the applicable statutory processes, the proposal for a permanent City ATTRO be approved in principle.

3.2 **ECONOMIC CRIME BOARD MINUTES - 5 FEBRUARY 2016**

Resolved – That the minutes of the Economic Crime Board meeting held on 5 February 2016 be received.

4. **OUTSTANDING REFERENCES**

RESOLVED – That the list of outstanding references be noted.

3. Barbican CCTV

The Commissioner reported that a project timeline had been circulated but was still in the procurement stage so it was not yet possible to predict an implementation date.

6. Internal Audit Review

The Chamberlain reported that review was currently in the consultation phase and the final recommendations and implementation details would be available at the next meeting on 14 April.

A member of the Committee asked if this could include an update on the Bridgehouse Estate.

7. Police Pensions Sub-Committee

Alderman Luder, Chairman of the Police Pensions Sub-Committee reported that five members of the sub-committee had been identified with one outstanding vacancy.

These were:

Chair:	Alderman Ian Luder
Additional elected member:	Deputy Alexander Deane
Police representative:	Superintendent Helen Isaac

Scheme member representatives:

Alan Goss (current pensioner)
Davina Plummer (deferred member)
Vacant (currently re-canvassing for interest)

Alderman Luder subsequently recommended their appointment.

RESOLVED – That Alan Goss and Davina Plummer be appointed as Scheme Member Representatives of the Police Pensions Sub-Committee.

8. Budget

This action had now been completed and could be taken off the list of outstanding references.

ATTRO

That a report back on the Policy and Resource Committee's decision in relation to this be provided at the next meeting.

5. **COMMUNITY REMEDY**

The Committee considered a report of the Community Safety Team setting out revised proposals for the Community Remedy Document (CRD) which had been updated to respond to a number of queries raised at the last meeting.

This included further information on the flexibility of the financial threshold for theft offences and addressed the concerns raised regarding the inclusion of section 4 of the Public Order Act, hate crime and domestic violence.

Members raised a number of questions concerning whether or not 'theft from the person' should be included, the options available to the victim, in what instances the CRD would be available, the results of the consultation exercise and how representative they were, future monitoring of the scheme and whether this would be done nationally, and also how the scheme would be advertised to the public.

Members noted that offenders with previous convictions couldn't be considered for a CR disposal if they had previous convictions or cautions, and officers would need to carry out checks to establish suitability prior to any decision being made.

RESOLVED - to

- a) Endorse the proposed remedies detailed in the report for inclusion within the Community Remedy Document.
- b) Approve publication of the Community Remedy for May 2016 to allow time to prepare the processes and provide necessary training.

6. **STANDARD ITEM ON THE SPECIAL INTEREST AREA SCHEME**

There were no updates.

7. **POLICING PLAN 2016-19**

The Committee received a report of the Commissioner of Police presenting the 'designed' Policing Plan approved at the January Committee.

The Commissioner advised that the designed version had not yet been reviewed for typing or other errors, which first printed drafts usually contained, but that this would be done before the plan was formally published.

The Committee noted that the measures had also been considered and formally agreed by the Police Performance and Resources Sub Committee on the 24 February 2016, so the wording of some of the measures in the version in front of Members were still subject to slight change.

The Deputy Chairman, and Chairman of the Police Performance and Resources Sub Committee reported that the Sub-Committee had raised a number of comments in relation to the use of the word 'level' instead of numbers, the number of surveys being undertaken as a measuring tool and how reliable these were, the need to target cyclists as well as motorists and whether or not 'narrative assessment' involved external scrutiny.

The Sub-Committee had raised a question concerning a measure for rough sleepers, and was advised by the COLP that this had not been raised as an issue of concern within the community. Rough sleepers came under the responsibility of the local authority and not the Police.

The Sub-Committee had also asked for the inclusion of a measure for victims of anti-social behaviour, and had agreed to revisit and review the measure for Cybercrime after six months.

RESOLVED – That the report of the Commissioner and comments of the Performance and Resources Sub Committee be noted.

8. ROAD DANGER REDUCTION PLAN 2016/17

The Committee received a report from the Director of the Built Environment detailing the progress being made in reducing road traffic casualties on City streets and setting out proposals for achieving further reductions in the future.

Members noted the proposal reflected an important emphasis on six key action areas of enforcement; engineering; business engagement and behavioural change; reviewing and learning from the successes of others; reviewing staff location; and strengthened working with TfL and the GLA.

Members welcomed the report but expressed frustration that the table indicating the current profile of casualties was out of date as only reported up to 2014. The Director of the Built Environment advised that this was the approved data from TfL.

Members questioned whether or not a proper analysis of the effectiveness of the measures was undertaken as targets were often unachievable. It was suggested that there was no point in trying to do things that just couldn't be done. The issue of why TfL were referring to data not relevant to the City of London was also raised.

RESOLVED - that the Road Danger Reduction Programme be noted.

9. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

Youth Offending System

In advance of the meeting a Member had raised a number of questions in relation to the youth offending system operating in the City of London.

The member was informed that a report was being produced for the September 2016 meeting which would cover all of the questions raised and the Member confirmed that she was happy with the response.

10. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

There were no items of urgent business.

11. **EXCLUSION OF THE PUBLIC**

RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of the Schedule 12A of the Local Government Act.

12. **TO RECEIVE THE NON-PUBLIC DRAFT MINUTES OF THE ECONOMIC CRIME BOARD MEETING HELD ON 5 FEBRUARY 2016.**

RESOLVED – That the non-public minutes of the Economic Crime Board meeting held on 5 February 2016 be received.

13. **NHS COMMISSIONING OF HEALTHCARE IN POLICE CUSTODY**

The Committee received and approved a report from the Commissioner of Police regarding the responsibility for custody healthcare and recommending a suitable course of action.

14. **CITY OF LONDON POLICE ACCOMMODATION PROJECT - GATEWAY 3/4 PROGRESS REPORT.**

The Sub-Committee considered and approved a joint Gateway 3/4 update report of the Chamberlain, City Surveyor and Commissioner of the City of London Police which provided the Committee with an update on the Police Accommodation project. The report primarily advised on the decant strategy to allow the project to proceed.

15. **FINSBURY HOUSE, 23 FINSBURY CIRCUS, EC2 - LETTING REPORT**

The Committee considered and approved a report of the City Surveyor in relation to the letting of Finsbury House, 23 Finsbury Circus.

16. **COMMISSIONER'S UPDATES**

The Commissioner of Police was heard concerning on-going and successful operations undertaken by the City of London Police.

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

There were no questions.

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

There were no items of urgent business.

The meeting ended at 12.50 pm

Chairman

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PERFORMANCE AND RESOURCE MANAGEMENT SUB (POLICE) COMMITTEE

Wednesday, 24 February 2016

Minutes of the meeting of the Performance and Resource Management Sub (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Wednesday, 24 February 2016 at 1.45 pm

Present

Members:

Deputy Douglas Barrow (Chairman)
Kenneth Ludlam
Deputy James Thomson

In Attendance

Officers:

Oliver Bolton	- Town Clerk's Department
Alex Orme	- Town Clerk's Department
Chris Harris	- Chamberlain's Department
Steve Telling	- Chamberlain's Department
Amanda Thompson	- Town Clerk's Department

City of London Police

Wayne Chance	- Acting Commissioner
Stuart Phoenix	- Strategic Development
Hayley Williams	- Chief of Staff

1. **APOLOGIES**

Apologies for absence were received from Alderman Alison Gowman, Deputy Joyce Nash and Deputy Henry Pollard.

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

There were no declarations of interest.

3. **MINUTES**

RESOLVED – That the minutes of the meeting held on 8 December 2015 be approved.

Matters Arising

5. HMIC Inspection Update – Workforce Model

Members were informed that the notes requested in relation to ROI's and the provision of mental health in custody had been circulated.

6. Internal Audit Update Report – Police Invoices on hold

To be added to the outstanding references.

4. **OUTSTANDING REFERENCES**

RESOLVED – That the list of outstanding references be noted.

4. The Chamberlain advised that a detailed response to this outstanding reference would be circulated within two weeks following clarification from the Chairman on exactly what was required.

5. **POLICING PLAN MEASURES 2016-17**

The Sub Committee received a report of the Commissioner of Police relating to the Policing Plan measures for 2016/17.

Members noted that at the Policing Plan workshop held in December 2015, it was agreed in principle to carry forward the current measures. This was proposed in the interests of consistency and being able to report meaningful trend information over the medium term. That proposal was also raised more formally at the January meeting of the Police Committee, where the plan was approved, subject to the approval of measures by the Sub Committee.

Members raised a number of comments in relation to the use of the word level instead of numbers, the number of surveys being undertaken as a measuring tool and how reliable these were, the need to target cyclists as well as motorists and whether or not 'narrative assessment' involved external scrutiny.

In response to a question from the Chair concerning a measure for rough sleepers, the Commissioner advised that this had not been raised as an issue of concern within the community. Rough sleepers also came under the responsibility of the local authority and not the Police.

The Sub-Committee also asked for the inclusion of a measure for victims of anti-social behaviour, and agreed to revisit and review the measure for Cybercrime after 6 months.

RESOLVED - That the report be noted and the measures approved.

6. **HMIC INSPECTION UPDATE**

The Committee received a report of the Commissioner of Police which provided an overview of the City of London Police response to Her Majesty's Inspectorate of Constabulary's (HMIC) continuing programme of inspections and published reports.

The Commissioner reported that progress had been made in most areas with the exception of those where they were still waiting for a national indicator to compare against.

During the discussion members questioned the status of a number of 'amber' indicators which clearly should have been 'red' as they had not yet been implemented, as well as the scheduling of a number of 'due dates' which had already passed. The Chairman also asked if in future the summary could also include which recommendations were outstanding or overdue.

In response to a question concerning the outcomes for children who had been in police custody the Commissioner advised that the number passing through the City Police was extremely low – one a month would be considered high. The Commissioner further advised that the Public Protection Unit were working with City Youth Services to establish if they could help gain an understanding of the experiences of children in custody in the City.

RESOLVED – That the report be noted.

7. 3RD QUARTER PERFORMANCE AGAINST MEASURES SET OUT IN THE POLICING PLAN 2015-18

The Sub-Committee received a report of the Commissioner of Police summarising Force performance against the measures in the Policing Plan 2015-18 for the period 1st April 2015 – 31st December 2015 and including a broad overview of wider Force performance.

The Chairman questioned the definition of trends described as 'Stable' which gave no indication of whether the position was a stable good or bad, and suggested that these be amended to give a more accurate description.

In respect of Measure 2 - the level of community confidence that the City of London is protected from terrorism – Members expressed concern that that this had decreased from 72.2% to 62%.

The Commissioner advised that the third quarter survey had taken place almost immediately after the terrorist attacks in Paris. Those respondents who registered low confidence and who left contact details were subsequently contacted by the Force to gain a better understanding of why they lacked confidence that the City is protected from terrorism. The results were consistent with previous quarters with many citing factors that were outside of the Force's control.

The Commissioner further advised that a second question was also posed for the quarter three asking whether people feel reassured by the work done by the City of London Police to protect the City of London from terrorism. That response to that question was very different, with 89.4% of respondents saying they felt reassured.

In response to a question concerning Measure 6 and the levels of victim based violent crime which continued to increase, the Commissioner reported that this was entirely comparable to the rest of London and the UK and the Force continued to deploy targeted operations based on intelligence. The

Commissioner also assured the Sub-Committee that this would remain a priority area at the Performance Management Group.

RESOLVED – That the report be noted.

8. INTERNAL AUDIT UPDATE REPORT

The Sub-Committee received a report of the Head of Internal Audit and Risk Management updating on the work of Internal Audit that had been undertaken for the City of London Police since the last report to the committee in December 2015.

The Sub-Committee was informed that work on the 2015-16 planned internal audit plan, which included eight full reviews and two grant claim verifications, was nearing completion.

In response to a question concerning why the number of days allocated for each review was not given as it had been in previous years, the Head of Internal Audit and Risk advised that this was not always helpful as reviews could overrun, or more likely be completed early, and it was necessary to try and allocate the appropriate number of hours to each audit.

In response to a further question concerning whether the work would be completed by 31 March 2016, Members noted that resources were now in place to achieve this.

RESOLVED – That the report be noted.

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

There were no questions.

10. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There were no items of urgent business.

11. EXCLUSION OF THE PUBLIC

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

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

13. NON PUBLIC MINUTE

RESOLVED – That the non-public minute of the meeting held on 24 February 2016 be approved.

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

The meeting ended at 3.10 pm

Chairman

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POLICE COMMITTEE

25 February 2016

OUTSTANDING REFERENCES

No.	Meeting Date & Reference	Action	Owner	Status
1.	25/02/2016 Public Realm Safety	A high level meeting has taken place with TfL; which was positive. Further work is being undertaken by officers and is expected to be agreed with TfL mid March. TfL have indicated that they will give the City their decision on the 2 April	Transportation and Public Realm Director and Acting Assistant Director, Environmental Enhancements	On Agenda 14 April 2016
2.	25/02/2016 Barbican CCTV	CCTV upgrade A project timeline for the procurement process has been circulated. Once the procurement process is completed it will be possible to identify an implementation date.	City Police/ Safer City Partnership	In progress June 2017
3.	25/02/2015 Internal Audit review	The Chamberlain reported that the review was currently in the consultation phase and the final recommendations and implementation details would be available at the next meeting.	Chamberlains/ Internal Audit	On Agenda 14 April 2016
4.	25/02/2016 Police Pensions Sub-Committee	Appointment of Employer/Scheme representatives approved by the Committee.	Town Clerk / Commissioner	TC to update
5.	25/02/2016 ATTRO	The Committee asked for a report back on the Policy and Resource Committee's decision on this	Town Clerk	The decision of the P&R Committee from 21 January 2016 is below.

		issue.		
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ATTRO – Copy of Decision from P&R Committee on 21 January 2016

RESOLVED – That:-

1. subject to the applicable statutory processes a permanent City ATTRO be approved in principle;
2. the Director of the Built Environment or her delegated officer be authorised to carry out consultation and publication of Notice of the proposal to make the City ATTRO;
3. the results of the evaluation of the consultation exercise and the Notice be submitted to this Committee and the relevant service committee to determine whether or not to proceed to make the City ATTRO and carry out all associated statutory processes;
4. any unresolved objections to the proposal be reported to the relevant committee to determine the next step;
5. the proposed protocol be considered by this Committee as well as the relevant service committee;
6. subject to the progress of the above recommendations a report on the use of the ATTRO be submitted to Members annually; and
7. in the event of Transport for London (TfL) agreeing to its roads in the City being included in the City ATTRO, and/or any neighbouring traffic authorities agreeing the inclusion of boundary roads within it also:-
 - a) the Comptroller and City Solicitor or his delegated officer be authorised to enter into any necessary agreements under Section 101 of the Local Government Act 1972 (or other joint working agreements) with TfL and/or neighbouring traffic authorities; and
 - b) the Director of the Built Environment or her delegated officer be authorised to amend the ATTRO to include agreed the relevant TfL roads and/or boundary roads with neighbouring traffic authorities.

Committee: Police Committee	Date: 14 April 2016
Subject: Community Engagement Update	Public
Report of: Commissioner of Police Pol 13-16	For Information
Report author: Paul Clements, Superintendent, Communities & Partnerships	

Summary

This report details issues raised by the community and the police response to those issues since the last report presented in January 2016¹.

The principal focus of the Communities Teams has been, and remains, to support the Force-wide counter-terrorism priority. Communities officers continue to participate in PROJECT SERVATOR deployments aimed at deterring and disrupting potential terrorist activity. Following the recent events in Brussels, we have deployed more officers to our residential and business communities to provide reassurance and to increase awareness of members of the public. Since January 2016, together with our colleagues in the Corporation, we have delivered a number of successful PREVENT events aimed at identifying and addressing those susceptible to or exhibiting signs of radicalisation.

This report has an additional three themes: (1) keeping our roads safe; (2) engaging with our communities; and (3) addressing Anti-Social Behaviour (“**ASB**”):

(1) Keeping our roads safe: - We have initiated several new approaches since January 2016, including ‘COMMUNITY ROADWATCH’ whereby members of our community participate in road safety enforcement. Our operation ATRIUM event in February was one of our most successful to date and involved the London Ambulance Service for the first time.

(2) Community Engagement: - We have continued to evaluate our efforts to tackle ASB including problems caused by rough-sleepers and aggressive beggars including reviewing new legislative tools (e.g. Public Space Protection Orders) to determine what extra value they would offer on enforcement.

(3) ASB: - The Street Intervention Team and the Corporation Community Safety Team have been joined at Guildhall by one of our principal charity partners – St. Mungo’s. We will assist in monitoring the effects of co-location to measure the benefits of a shared approach to addressing the concerns of our communities.

Recommendation:

Members are asked to receive and note the report.

¹ From March 2016, the Force’s Communities & Partnerships teams comprise: Communities; the Transport and Highways Operations Group; and Licensing.

Main Report

1. Countering terrorism

The events in Brussels of 22 March 2016, where more than 30 people were murdered and many more injured, are yet another reminder of the severe threat the City of London faces from terrorism. Countering this threat remains the Force's principal priority.

Teams in Communities and Partnerships have, coordinating with the rest of the Force and in partnership with the Corporation and other police forces and agencies, contributed to our counter-terrorism in three broad areas.

i. Deterring and disrupting potential terrorist acts

In the last quarter, Communities officers have continued to deploy on PROJECT SERVATOR operations. This operation, which is now 'business as usual' in the City, involves high visibility policing in unpredictable locations to induce behaviours in those intent on committing crime (including terrorism) alongside specially trained officers to detect those behaviours.

Communities officers have in this quarter also been deployed to support the high visibility elements of these operations. When officers deploy in numbers around specific locations in the City, and especially given the current terrorist threat, we receive lots of questions from members of the public, some of who are concerned that there may be a specific threat. Communities officers are on hand also to engage with members of the public, to reassure them by informing them of the rationale behind the deployments and the fact that this is now 'standard' policing but also to remind our business, residential and transient communities to remain alert and to contact the police if they see anything suspicious. Our message in the light of the Brussels attack has been for the public to remain 'aware but not alarmed'.

It is clearly difficult to measure the outcomes of the deterrence and disruption elements of our deployments (apart from the absence of any terrorist incidents). We can however measure the success of our stops/searches of those whose behaviour we detect during the course of these operations. In the first quarter of 2016, our conversion rate (the proportion of stops/searches of individuals that result in arrest or warning for drugs possession) remains at c.70% compared to a national rate of lower than 20%.

Members of the Force's Independent Advisory Group (IAG) joined officers on a PROJECT SERVATOR deployment to see the tactics first hand. This generated positive feedback and many questions and Chief Inspector Duffy delivered a follow-up presentation at February's IAG meeting.

ii. Preventing terrorism

Community policing, working together with the Corporation, is responsible for our PREVENT activity – one of the four strands of the Government counter-terrorism strategy. PREVENT aims to stop people becoming terrorists or supporting terrorism.

We continue to work with all sectors of our communities (businesses, residents, the education sectors etc.) focusing on supporting partners to maintain the capability to identify those that are vulnerable to radicalisation or exhibiting signs of radicalisation or terrorist sympathies. Community policing then implements the required interventions.

This quarter saw the release of the Syrian Mothers film. Produced nationally and delivered locally, the piece focuses on three Syrian refugee mothers speaking directly to mothers in the UK about the realities of life in Syria and questioning why any woman would want to take their family to live in a war zone. It is complemented by open letters that the women have written urging mothers in the UK to take steps to prevent their daughters travelling to Syria.

Community Policing organised the City of London Launch, which was held at the Green Box, Mansell St and was well attended. It provoked valuable discussion among the community and the PREVENT Team are now in initial discussions with a provider to deliver training to mothers in the City around combating Islamist extremist ideology and promoting social cohesion. The DVD and presentation was also delivered to the Crime Prevention Association.

Communities officers have continued this quarter to work with the Corporation to raise awareness of and trust in PREVENT. Training has been given to the following departments/organisations:

- Apprenticeship Training.
- Multi Agency Sexual Exploitation (MASE) board.
- The City and Hackney Safeguarding Children board.

A PREVENT Open Day jointly planned with the Corporation, took place on 24 March 2016. This comprised two Workshops to Raise Awareness of Prevent (WRAP) and a lunchtime drop-in session.

Additionally, PREVENT training is being rolled out to all departments within the City Police to raise awareness and understanding of the strategy and in particular the process through which individuals who are suspected being radicalised or of supporting terrorism are referred to the Police.

In addition to PREVENT, the Force's Counter-Terrorism Security Advisers have continued to engage with our business community as part of PROJECT ARGUS² and PROJECT GRIFFIN³. In the first quarter of 2016, we have delivered 16 PROJECT GRIFFIN events and 13 PROJECT ARGUS events across the City.

² Argus is a table-top exercise featuring a three hour multimedia simulation, which poses questions and dilemmas for participants working in syndicates and aims to raise awareness of the threat from terrorism, providing practical advice on preventing, handling and recovering from an attack

³ Griffin aims to advise and familiarise managers, security officers and employees of large public and private sector organisations across the City on security, counter-terrorism and crime prevention issues.

iii. Engaging and reassuring our communities

Communities officers have continued high visibility patrols throughout the first quarter of 2016 as part of our core community engagement responsibilities. Responding to community concern in the aftermath of the Brussels attacks, officers deployed in high visibility around key areas including transport hubs and crowded places at morning rush hour for reassurance.

PCSOs have been deployed to estates, particularly the Mansell Street Estate, in to reassure the community and to gauge public feeling. Officers reported positive feedback related to the high visibility and engagement of officers and did not note any community tensions. Officers have also been deployed to schools for reassurance.

Our **EYES AND EARS AWARENESS PROGRAMME** continued in the first quarter of 2016. This scheme involves traffic wardens, Cheapside Ambassadors, Parkguard, and Street Cleansing teams. The rationale is to take advantage of colleagues from different partner organisations who spend a lot of their time on the City's streets, establishing a communication mechanism that should be a valuable source of information and intelligence.

The scheme works by our officers regularly briefing the teams on current crime trends, issues and counter-terrorism information. The return is a flow of information to Community Policing, which helps us build a picture of the any issues that may be emerging. We are now looking to expand this fully and introduce this in other areas, such as Smithfield Meat Market Security, Parks and Gardens and Car Park officers. With this in place, we can be confident we have many more pairs of eyes helping the police and the community keep the City safe.

2. Tackling and preventing Anti-Social Behaviour

Levels of ASB in the City are low. However, we constantly review our efforts to address problems and we continue to respond, proportionately, to the concerns of our community.

For example, we continue to focus on the aggressive begging in the Bishopsgate area. Some of those who persist in aggressive begging in the City are also homeless and in most cases tend to be addicted to alcohol or drugs (or both). Some of these people are also responsible for acquisitive crime in the City.

Since this is a complex problem, we have taken a multi-agency holistic approach to addressing it, including enforcement and other interventions to prevent the problem. The Police and Corporation Street Intervention / ASB teams co-located in the Guildhall have this quarter been joined by our partner charity St Mungo's. We are monitoring this arrangement to evaluate the success of joint-working.

We continue to review the effectiveness of our enforcement and intervention activity, including analysing the potential use of new legislation including Public Space Protection Orders (PSPOs).

The IAG meeting in March 2016 scrutinised the Force's approach to ASB. An update will be provided in the next Community Engagement Paper.

Specific information on locations that have seen ASB this quarter can be found in Annex A.

i. Begging

OPERATION FENNEL is our initiative to combat begging in the City which commenced in June 2013. A person suspected of begging will be given a 'Street Awareness Initiative' voucher requiring them to attend an educational and welfare appointment with our partner charities (including St. Mungo's) and other homelessness, drug and alcohol workers and veterans' charities. The voucher allows for two warnings before arrest or summons to court.

Since December 2015, we have issued 160 Fennel vouchers to 80 individuals which resulted in 7 applications for Criminal Behaviour Orders and/or summons to court.

ii. Rough sleeping

This quarter we have continued our work with other agencies to reduce homelessness in the City, including in partnership with UK Border Agency which resulted in a few removals from the UK.

OPERATION ACTON is a joint initiative with the Corporation and St. Mungo's, designed to address homelessness and rough sleeping. This quarter we held a 'pop-up hub', using local churches within the square mile to accommodate rough sleepers in order to facilitate assessment and also provide a few nights respite in sheltered accommodation. In the morning, clients were taken to a day centre and provided with breakfast and access to washing facilities. There further assistance related to housing options is offered. In February 2016, we provided accommodation to 17 rough sleepers and gave out 10 tickets [PNDs?] to entrenched rough sleepers who elected not to engage with us.

iii. Working with the business community to secure vacant buildings

Community officers have continued to work with our Force Intelligence Bureau to identify vacant buildings within the City. Vacant buildings are vulnerable to occupation from squatters and known protest groups and use for raves. By working with the building managers and security, we have sought to mitigate these risks by identifying vulnerabilities in building security and advising on measures to improve and strengthen resistance to occupation.

Should a building become unlawfully occupied then Community Policing will act as the liaison for the building manager to facilitate the safe and legal removal of occupiers, supporting security staff and providing post-event advice to prevent a recurrence.

3. Making the City's roads safer

In the first quarter of 2016, we have continued to deliver operations aimed at making the City's roads safer for all road-users and pedestrians.

We have begun work to analyse harm spots, the points around the City where road traffic collisions are concentrated and where the incidents of greatest harm (in terms of people killed or seriously injured (KSI)) are distributed. We will use this mapping to inform where we deploy resources for enforcement purposes.

Additionally, the City of London Police sits on the Road Danger Reduction Strategic Board with Transport for London (TfL), the Department for Transport, the Greater London Authority and the London Fire Brigade. We are now working with these partners, setting out shared partnership objectives with clearly articulated individual responsibilities to improve safety on the City's roads.

We routinely evaluate the effects of our interventions and enforcement activity and have implemented several enhancements to our operations which we will monitor throughout 2016 for effectiveness.

COMMUNITY ROADWATCH is a partnership campaign launched in the City in January 2016 by TfL, City of London Police and the Corporation's Road Safety Team. It aims to reduce speeding in residential areas and has given local residents the opportunity to work side by side with their local police teams, and use speed detection equipment to identify speeding vehicles in the City. Warning letters have been issued where appropriate, and the information captured will inform the future activity of local police teams. Since the launch 101 first warning letters have been sent to speeding motorists advising them of their speed in a 20mph zone.

20mph Zone City officers continue to focus on and enforce against speeding motorists in the 20mph zone. The following have been issued from April 2015 – Feb 2016:

- 550 Traffic Offence Reports
- 116 endorsable tickets
- More than 100 summons to Court

OPERATION WINCHESTER In January, we received extra funding from TfL to work jointly with the Metropolitan Police to engage with motorcycles. Our aim is to engage with motorcyclists and advise them that they are, more often, not the cause of collisions, but possibly a victim. A discounted 'Bike Safe Scheme' has been offered

to riders to educate and therefore try and reduce the number of people killed or seriously injured (KSI) from this group of particularly vulnerable road user.

OPERATION ATRIUM targets another group of vulnerable road-users – Cyclists. We periodically run this operation to enforce cyclists who are not obeying traffic signals, cycling dangerously or on the pavement. Cyclists receive a ticket and a fine, which is rescinded if they attend an educational event called “Exchanging Places” where they receive advice about cycling and see the road from an HGV driver’s perspective.

February’s event held at Dowgate Hill Fire Station saw a significant number of cyclists (85). For the first time we invited a paramedic cyclist from the London Ambulance Service who delivered a talk on the impact of a pedal cyclist involved in a collision, informing them of how to help someone who may be seriously injured or bleeding to death. From feedback, this was very well received by the cyclists.

4. Engaging our communities

A core responsibility for Communities & Partnerships officers is to liaise with our communities. In the first quarter of 2016, we have introduced innovative approaches to help achieve this.

i. Preventing pedal cycle thefts

This quarter we have continued to focus on the theft of pedal cycles in the City. We are about to launch our new ‘Bullitt bike’, which is a large cargo style cycle enabling us to carry lots of kit), which will host ‘pop-ups’ for cycle marking and crime prevention concentrating on the hot spot areas that we work with our Force Intelligence Bureau colleagues to identify.

We are now dealing with all victims of cycle crime in the City contacting them and offering prevention advice and a free £85 ‘gold standard’ lock where applicable. We have begun to offer cycle marking can for free at Snow Hill Police Station between 1000-1500 hours from Monday to Friday.

ii. Liaising with communities and construction companies on building projects

The Force’s Architectural Liaison Officers (ALOs) sit within Community Policing and work closely with the Corporation planning office to identify new builds at the earliest stage to engage and provide advice on how to ‘design out’ crime, as well as coordinating Counter-Terrorism Security Advisers (CTSA) involvement and advice.

Our present focus includes the Eastern Cluster development and our officers are involved in the preparatory work both in terms of crime and security. We have also begun consultation on the Mansell Street residential development, and will involve local community officers in developing options to make the new estate as impervious as possible to crime and ASB from a design perspective.

A Communities officer also now sits on the panel of the Construction Industry Cycle Commission (CICC), which looks at the way new buildings are built in the City and encouraging and assisting constructors to incorporate cycle-friendly design.

iii. Reviewing how we communicate with our communities

Community policing have begun to reassess the needs and requirements of the community to determine what kind of communications media would best suit the Force and the business and residential community. We have recently enhanced our use of Social Media. This has included the use of Twitter and Communities officers participated in a live Twitter question and answer session in February 2016.

iv. Engaging our schools and our young people

Our DARE programme continues to deliver education to the City's schools and is well-received by children and their teachers. Since January 2016, Communities officers have delivered programmes at the City of London School for Girls (Year 6); the City of London School for Boys (Year 7); and St. Paul's Cathedral School (Year 6). In the next quarter we will deliver programmes at the City's other schools, all of whom participate.

Five new DARE officers have been trained since January 2016 to further enable these programmes.

Communities officers in this quarter have organised a visit to Wood St Police Station for the reception class of St Paul's Cathedral School. They were able to visit the mounted section, had an input from the dog section and had a chance to sit in the police cars and on the motorbikes and learn a little more from our traffic officers. The 1st City of London Cub Scouts visited Snow Hill Police Station where they were able to see the custody suite and shown the process of how prisoners are booked in. They also tried on various police kit and look at the police cycles.

Appendices

- Annex A - ASB information on specific locations

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ANNEX A - ASB information on specific locations

Prêt a Manger (Bishopsgate)

Repeat issues with rough sleepers at location and incidents of drinking and urination. Patrols and enforcement to deter and detect offenders. Issue currently resolved and monitored by patrols.

Woodin's Shades Pub (Middlesex Street)

Issues with beggars that congregate in the area of Bishopsgate and Middlesex Street, we have issued tickets to principal offenders and one has recently been sentenced at court, ongoing issue that is managed by patrols of plain clothes officers.

222 Bishopsgate

Repeat issues with rough sleepers at location and incidents of drinking and urination. Patrols and enforcement to deter and detect offenders. Issue currently resolved and monitored by patrols.

Magpie Pub (New Street)

Issues with the beggars that congregate in the area of Bishopsgate/New Street, we have issued tickets to all offenders' ongoing issue that is managed by patrols of plain clothes officers.

Tesco Bishopsgate

Issues with beggars and plain clothes in the area of the entrance to Tesco on Bishopsgate we have arrested 2 persons for aggressive begging, ongoing issues being dealt with by plain clothes officers.

Wasabi (Liverpool Street)

Issues with rough sleepers outside of premises officers detailed to move on when seen.

Bishopsgate Institute

Continuing reporting by institute of rough sleepers and drug taking. We continue to monitor this site, including using plain clothes officers. On each occasion in the repeat areas of ASB reporting we engage and liaise with the complainant and update them on any developments.

Sandy Row / Middlesex Street

In the area of sandy Row and Middlesex Street there is a concentration of reports of drug taking, rough sleeping and ASB, we continue to monitor this area with plain clothed and Uniformed Patrols.

Committee:	Date:
Police Committee	14 April 2016
Subject: Quarterly Equality and Inclusion Update	Public
Report of: Commissioner of Police Pol 14-16	For Information
Report author:	

Summary

This paper provides your Committee with an update of Equality and Inclusion related activities conducted by the Force since the previous report to your Committee. The areas covered by this report are:

1. **Health and Wellbeing Network** – The Health and Wellbeing Network is being launched on the 12th of April.
2. **City of London Police Blue Light Pledge** - The City of London Police has signed up to the government backed Mind Bluelight pledge.
3. **Mentoring Scheme updated** – Work is being conducted to update the current mentoring scheme.
4. **Volunteer E and I officers** - Two University graduates are volunteering one day a week in the E and I Unit, assisting with research and other initiatives.
5. **Easy Read guides** - A number of easy read guides are being produced by the E and I department.
6. **University and School Engagement** - E and I department have been engaging with schools and universities.
7. **LGBT National Conference** - City of London Police will be hosting this year's National Police LGBT conference.
8. **Volunteer Chaplaincy** - Two volunteer chaplains have been recruited.

Recommendation:

Members are asked to receive and note the report.

Main Report

Background

At your Committee meeting in January 2015 the Commissioner undertook to provide Members with a quarterly written update on matters relating to the Equality, Diversity and Inclusion Portfolio. This report highlights the work that is being carried out across the Force in relation to the above and provides an update since the last report to your Committee.

Health and Wellbeing Network

1. Health and wellbeing at work is fast becoming one of the most important assets any company can look to invest in. Regardless of the size of a business, the workforce is the lifeblood of the organisation and by making a small investment sooner rather than later, there can be huge benefits in the future for both the company and the staff. With this in mind, Commissioner Dyson approved a new staff network to improve staff health and wellbeing. The Health & Wellbeing Network is aiming to launch officially on 12th April 2016, with an event taking place in the CH Rolph Hall at Wood Street. The overall aim of the Network is to improve the well-being of all staff and officers across the Force in order to increase motivation, attendance and the ability to work.

2. The network committee presently consists of approximately 15 people, who are working behind the scenes to get things in place before the launch. T/Commander Woolford has agreed to be the network champion and is supportive of the network objectives. Commissioner Dyson will be opening the event and Commander Greany will be closing it. The event will also have a number of key-note speakers throughout the day.

3. Some of the key objectives include;

- Work together with Occupational Health, CoLP's Health and Safety Manager, other CoLP networks and people within Force who have a strong interest and/or that may have qualifications in any of the above areas.
- Host events to address physical and mental health challenges faced by people today, especially following the Winsor Review and the increase in retirement age for all.
- Establish Force-wide points of contact to provide support and up-to-date information about related services in the City.
- Identify ways to train and support supervisors, by improving their skills on how to be supportive managers without it adversely impacting their own well-being.
- Fund training for Police officers to become fitness mentors in order to prepare and support others for the job related fitness tests.
- Develop an intranet page which will signpost people to local services available as well as advertise initiatives that the network are involved with.

4. The launch has already attracted the likes of Public Health England, Mind and the National Police Chief Council's wellbeing lead ACC Andy Rhodes. The network will also be working alongside Occupational Health and the City of London Corporation, who are also launching their own recently approved Wellbeing strategy.

City of London Police Bluelight Pledge

5. One in four people in the UK will experience a mental health problem in any given year. Research conducted by the charity Mind showed that an estimated quarter of a million people who work and volunteer in the emergency services are even more at risk of experiencing a mental health problem than the general population, however are less likely to receive support.

6. Mind has been awarded LIBOR funding to develop the Blue Light Programme, to provide mental health support for emergency services staff and volunteers from police, fire, ambulance and search and rescue services across England. The programme is being developed in consultation with individuals from across the emergency services.

7. City of London Police have signed up to the Blue Light Pledge to drive long term change; Blue Light are working with the Police, Fire and Rescue, Search and Rescue and Ambulance services to encourage them in their capacity as employers to tackle mental health stigma in their workplace.

8. By pledging, CoLP will be aligning the organisation with a major national movement for change. Importantly, it shows that this aspirational commitment to be active in tackling mental health stigma and discrimination in the workplace has support from the top - helping to inspire a culture of change within the organisation.

Mentoring Scheme updated

9. The Mentoring Scheme is being redeveloped, and a scoping exercise is currently being conducted to look at:

- Whether mentors/mentees continue to participate in the mentoring relationship
- If they do not, has their mentoring objective been achieved?
- Of the mentors not participating, would they like to continue in their role as a mentor?
- If the mentees objective has not been achieved, would they like to be matched with a new mentor?

10. As a result of the exercise a 3 tier mentoring scheme is being developed which will include an internal mentoring scheme, external mentoring scheme and a community mentoring scheme.

- Tier 1 of the scheme gives officers and staff the ability to be a mentor or to be mentored within City of London Police.
- Tier 2 gives officers and staff the opportunity to be a mentor or be mentored by staff from the local government 'My Mentor Scheme', which currently has local government and London NHS trusts signed up to it.
- Tier 3 is focussed on community engagement and the opportunity to mentor young people from underprivileged backgrounds, neighbouring schools/college/university and other charities and organisations (this phase is currently in development and will be launched during 2016).

Volunteer Equality and Inclusion officers

11. The E and I Unit has recently taken on two volunteers who are working within the department as E and I officers one day a week to assist the department in a number of different areas. The volunteers are University students who bring with them knowledge in the areas of criminology and sociology through their degrees.

12. The volunteers have provided the Unit with the opportunity to not only utilise the skills and knowledge that they possess but they have also brought a fresh perspective to the work within Equality and Inclusion, which is anticipated will have a positive impact over the medium to longer term.

Easy Read Guides

13. The E and I Unit have developed a number of easy read guides, including one for custody and stop and search and are in the process of developing a number of other guides for different areas of policing to ensure that information provided to the public is accessible for everyone.

14. Easy read is an accessible way of writing information for people with a learning disability; however, as easy read documents are written in simple language they work for everyone, not just people with a learning disability.

15. The easy read guides will help children, young people and parents with a learning disability understand the law and learn where to go for help and extra support. These guides will help people with a learning disability to feel more included and engaged.

University and School and Engagement

16. The E and I Unit have been engaging with students from schools, universities and members of the business community as part of the City of London's work to reach out to the communities it serves.

17. Ten girls from Mulberry School in Whitechapel visited the Force to learn more about the different jobs and careers within the City of London Police. They were present from 10 am- 4pm every day for a week. As the volunteers, the students provided valuable feedback of their experiences and perceptions of the Force.

18. Twelve University students visited the City of London Police to assess options around improving how the Force conducts, records and manages stops and searches. This will assist with Force objectives around the better use of stop and search and the use of Taser in the City of London. It will also improve how CoLP engages with stakeholders who might have a preconceived idea about the disproportionate use of the above.

19. A number of other initiatives are currently being looked at to increase engagement with schools and universities to try to utilise their knowledge and skills and to give them the opportunity to learn more about the City of London Police.

LGBT National Conference

20. CoLP is pleased to announce that the 2016 National LGBT Police Conference is confirmed as taking place Friday 15th July 2016 at the Guildhall. Gay, Lesbian, Bisexual and Transgender staff from the policing community up and down the country will be attending to network and discuss current LGBTQ topics.

21. This year's theme will be LGBTQ in Religion. We are planning to have some exciting and hi-profile leaders present on their experience of being gay and of faith and finding their own personal identity and managing conflict. The aim of this event is to connect networks and advance ideas and thinking around equality and inclusion best practice. It is a fantastic opportunity for the police to engage with LGBTQ community service providers.

Volunteer Chaplaincy

22. The CoLP have recruited two volunteers as Force Chaplains to help provide pastoral care to City Police officers, staff and their families and where applicable to assist officers in police work in a pastoral role.

Conclusion

22. The Force continues to work on Equality and Inclusion issues, with strong oversight through the E and I Board. Acting on the feedback from the external benchmarking exercises assists the Force to incorporate best practice into its processes. Regular reporting to your Committee ensures a scrutiny process is in place that holds the Force to account on its performance in this important area.

Appendices

- None

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Committee	Dated:
Police Committee	14 April 2016
Subject: Revenue Budget 2016/17 Update	Public
Report of: The Chamberlain and The Commissioner	For Decision
Report authors: Stephen Telling (Chamberlain's)	

Summary

In March the Court of Common Council agreed a recommendation of the Finance Committee to increase the Business Rates Premium by 0.1p to 0.5p in the £ from April 2016 with the additional income, estimated at £1.6m a year, being allocated to the City of London Police to cover recently identified cost pressures relating to security

Following the decision of the Court, the 2016/17 revenue budget approved by your Committee in January has been updated to include funding for 13 security related posts (10 new posts and 3 posts which were otherwise at risk of deletion) and associated training and equipment costs to be funded from the increased Premium – leaving the budget for 2016/17 in an unchanged break-even position.

These changes, detailed in the main report, do not alter the underlying financial position which remains challenging with deficits of £2.9m and £4.8m forecast in 2017/18 and 2018/19 respectively. As previously reported, therefore, further steps will be required to achieve a balanced financial position over the medium term. It is intended to present a further report (or reports) on the strategy for restoring financial balance by 2017/18 together with an updated programme of capital and major revenue projects over the medium term. These will be prepared in time for the Resource Allocation Sub Committee Away-Weekend on 24/25 June.

Recommendation

Members are asked to approve the updated revenue budget for 2016/17.

Main Report

Background

1. This report provides the Committee with an update on the Force's revenue budget 2016/17 following the decision of the Court of Common Council in March to increase the Business Rates Premium by 0.1p to 0.5p in the £ from April 2016 with the additional income, estimated at £1.6m a year, being allocated to the City of London Police to cover recently identified cost pressures relating to security.

Current Position

2. Additional challenges and cost pressures have been identified by the Commissioner since the compilation and approval of the Police Revenue Budget for 2016/17 by your Committee in January. The principal reason that police budgets have been protected in the December settlement is the severity of the threat faced by the UK. The scale and complexity of the attacks in Paris have required forces to fundamentally re-think assumptions around responding to such events. The Commissioner is responsible for establishing the operational policing requirements for the City of London and the Force has reviewed its capacity and capability to respond to a terrorist assault on the scale of the Paris attacks. As a result, the Force's Senior Management Board has identified two areas where the response capability should be increased:
 - A further ten specialist firearms officers are to be employed. This will be in advance of any additional grant that may be provided by the Home Office. At the time of writing, the amount and criteria for any Home Office funding for an uplift in armed officers is unknown. The cost of ten additional officers is estimated at £500,000 with the cost of associated training and equipment estimated at £350,000.
 - The Home Office has indicated that during 2016/17 it intends to reduce the amount of funding available for Counter Terrorism Security Advisors (CTSAs).
 - The Force currently employs five CTSAs, which would reduce to two if the Force does nothing to compensate for the reduced funding. The density of new developments in the City, currently and planned over the medium term, means that to maintain the level of security necessary to protect the City of London, the Force may determine it necessary to fund additional CTSAs from its core budget to keep the level at five. An additional three officers is estimated at £150,000.
3. The Force has two additional tools to its response to the terrorist threat;
 - Operation Servator, which uses behavioural detection officers and cutting edge techniques to target suspect individuals and situations. The level of resources necessary to sustain the level of activity, or increase if dictated by the level of risk, is likely to result in a budget pressure.
 - The Ring of Steel, although recognised as excellent, is now in need of significant investment to ensure its continued effectiveness as a tool to address threat.
4. These additional pressures were not foreseen as likely prior to November 13th, the date when Paris was attacked by terrorists. Consequently, these pressures did not feature in basing the budget on 700 officers, but need to be addressed, which makes the task of restoring financial balance that bit harder.

5. The impact on the 2016/17 revenue budget of the additional cost pressures and the associated funding from the increase in the Premium are summarised in the following table:

	2016/17 Original Budget Jan 2016	2016/17 Original Budget Update	Change
	£m	£m	£m
Employees	78.7	80.0	1.3
Other Expenditure	29.0	29.3	0.3
Action Fraud - savings	(0.5)	(0.5)	0.0
Expenditure	107.2	108.8	1.6
Specific Government Grants	(36.3)	(36.3)	0.0
Partnership Income	(13.2)	(13.2)	0.0
Fees and Charges	(1.1)	(1.1)	0.0
Income	(50.6)	(50.6)	0.0
Total Net Expenditure	56.6	58.2	1.6
Funded by:			
Core Grant	(52.0)	(52.0)	0.0
Premium	(5.1)	(6.7)	(1.6)
Action Fraud - cash flow adjustments	0.5	0.5	0.0
Resources (Cash Limit)	(56.6)	(58.2)	(1.6)
Deficit (Surplus)	0.0	0.0	0.0
General Reserve			
Opening Balance at 1 April	(5.4)	(5.4)	0.0
Total Expected Use of (Contribution to) Reserve	0.0	0.0	0.0
General Reserve (In-Hand) at 31 March	(5.4)	(5.4)	0.0

Medium Term Financial Forecast

These changes do not alter the underlying financial position which remains challenging with deficits of £2.9m and £4.8m forecast in 2017/18 and 2018/19 respectively. This would leave the reserve at £2.5m as at 31 March 2018, breaching the strategy of retaining a minimum level of £4m, and potentially an overdrawn position of £2.3m by 31 March 2019. Therefore, as previously reported, further steps will be required to achieve a balanced financial position over the medium term. A further report (or reports) on the strategy for restoring financial balance by 2017/18 together with an updated programme of capital and major revenue projects over the medium term will be presented to your Committee in time for the Resource Allocation Sub Committee Away-Weekend on 24/25 June.

Appendices

- None

Background Papers

Report to Police Committee (21 January 2016) on Revenue and Capital Budget 2016/17 and Draft Medium-Term Financial Plan up to 2018/19

Report to Court of Common Council (3 March 2016) on City Fund 2016/17 Budget
Report and Medium Term Financial Strategy

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Committee	Dated:
Police – For Information	14 April 2016
Subject: Internal Audit Review of Insolvency – Firms in Liquidation, Receivership and Administration	Public
Report of: Chamberlain	For Information

Summary

Subsequent to the transfer of the Action Fraud Service to the City of London Police with effect from 1 April 2014, the service was subject to a procurement process and the contract was awarded to IBM. In July 2015, prior to the IBM contract commencing, one of the companies providing the existing service (BSS Ltd) went into administration. This required interim arrangements to be put in place before commencement of the IBM contract.

As a result, Members questioned what procedures are in place to identify when companies employed by the City Corporation encounter financial difficulties/risks so as to provide time for alternative arrangements to be considered proactively rather than reactively. At the request of the Committee, this was referred to Internal Audit which already had a “Review of Insolvency – Firms in Liquidation, Receivership and Administration” scheduled in its Audit Plan.

The Internal Audit report is appended and makes specific reference to BSS Ltd at paragraph 22. It indicates that whilst a request was not made for a financial appraisal prior to the transfer of the service from the Home Office, the company would have passed the City’s normal criteria if it had been assessed at that time. However, concerns about an over reliance upon a small number of clients and pension liabilities would also have been highlighted. In addition, if a check had been undertaken, the company would have been subject to on-going monitoring as set out in paragraph 18 of the report.

The report makes recommendations for:

- the corporate guidance on insolvencies and its implications for the City to be updated and published in the Procurement Code to ensure wide circulation amongst staff;
- improvements to the completeness of a supplier’s status as recorded on the City’s financial information system, CBIS; and
- clarity of roles relating to the reconciliation of outstanding amounts owed to and from insolvent firms.

All the recommendations have been agreed by management and implementation will be monitored by the Audit and Risk Management Committee.

Recommendation - Members are asked to note the report.

Appendix 1 – Internal Audit Final Report “Review of Insolvency – Firms in Liquidation, Receivership and Administration”

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CITY OF LONDON
CHAMBERLAIN'S DEPARTMENT
INTERNAL AUDIT SECTION



CORPORATE
**REVIEW OF INSOLVENCY - FIRMS IN LIQUIDATION,
RECEIVERSHIP AND ADMINISTRATION**
FINAL REPORT

Date Issued: 2nd March 2016

Issued to:

John Barradell (Town Clerk and Chief Executive)
Peter Kane (Chamberlain)
Adrian Leppard (Commissioner of the CoL Police)
Peter Bennett (City Surveyor)
Michael Cogher (Comptroller and City Solicitor)

CONTENTS (INDEX)

<u>SECTION</u>	<u>PAGE</u>
SECTION A: EXECUTIVE SUMMARY	3
SECTION B: AUDIT FINDINGS	5
APPENDIX 1: Past Corporate Requirements for Insolvency Risks	11
APPENDIX 2: Past Procedures for Creditors in Liquidation	13
APPENDIX 3: AUDIT DEFINITIONS AND RESPONSIBILITIES	14

Audit Fieldwork completed	25 th January 2016
Draft Report Issued	10 th February 2016
Management Response Received Agreeing Recommendations	1 st March 2016
Final Report Issued	2 nd March 2016

SECTION A: EXECUTIVE SUMMARY

Introduction

1. This review is being undertaken as part of the agreed 2015-16 internal audit plan and was last the subject of an Internal Audit review in 2006.
2. Since 2006, some 933 of the City's Suppliers (e.g. companies with whom the City of London procures goods, works or services) have been recorded on the City's Business Information System (CBIS) as having gone into administration, liquidation or receivership.

Insolvencies within the City of London Suppliers

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Totals
Administrations	10	13	28	15	50	64	30	11	12	23	256
Liquidations	17	48	74	40	124	188	48	44	30	36	649
Receiverships	1	3	2	4	6	4	3	3	2	0	28
Totals	28	64	104	59	180	256	81	58	44	59	933

3. [Construction News](#) reported in July 2015 that the number of construction firms experiencing financial distress (23,000) was up by 31% in the prior 12 months, which is roughly in accordance with the City's own data indicating an increase of 34% between 2014 and 2015.
4. With the City's level of expenditure and the current climate of austerity it is therefore increasingly important that robust procedures are in place setting out the steps to be taken when contractors, consultants and suppliers cease to trade. When this happens there is cause for concern because there is the risk of one or more of the following happening; staff time and therefore expense will be needed to appoint another firm; the new firm may cost more than the original; the project itself may be delayed and/or there could be a delay in regaining site possession, during which time the contractor or sub-contractors could strip the site of saleable assets already paid for. Further, consultancy cost could rise as a result of any of these factors, any of which could cause the project to go over the approved budget requiring additional expense and time in obtaining additional funding.
5. The systems in place must therefore be sound and those officers involved in the co-ordination of this process should be fully aware of the actions to be taken to minimise the risk of additional expense or delay to the completion of the project.

Audit Control Objectives

6. The purpose of this audit review was to give an assurance opinion to Chief Officers on the adequacy of corporate controls which are intended to mitigate risks to the City when firms go into administration, liquidation, or receivership.

Guidance and Co-ordination

7. This review has found that the previously published guidance directing officer actions has lapsed through various corporate changes and is no longer known to staff. We also found that the system needs improved co-ordination of the communication and recording of company details when insolvency applies.

Initial and On-going Financial Appraisals

8. We also found that there is a well-developed system in place within the Chamberlain's Corporate Treasurers Unit (CTU) for the financial appraisal of suppliers prior to contracts being entered into, and for the on-going monitoring of supplier accounts, where they have been assessed and are then used on contracts exceeding one year. Officers of the CTU carry out these evaluations in compliance with the detailed guidelines in place, along with a comprehensive list of specific checks and actions, to be carried out when financially appraising firms.

Recovery of Additional Costs

9. There is no specific assignment of responsibility for one officer, section or department to communicate with the CTU, contract managers and others so as to reconcile outstanding sums due to, or from, an insolvent firm, or whether a corporate right of set off needs to be employed.

Internal Audit Assurance Statement

Assurance Level	Description
Moderate Assurance	An adequate control framework is in place but there are weaknesses and/or a lack of compliance which may put some system objectives at risk.

Key Conclusion

10. The previously well embedded system for dealing with firms going into insolvency has deteriorated over recent years and now needs to be re-established under the directed control of one lead department or alternatively clearly establish roles and responsibilities that are fully understood by staff.

Recommendations	Red	Amber	Green	Total
Number Made:	0	3	0	3
Number Accepted:	0	3	0	3

SECTION B: AUDIT FINDINGS

Key Findings

Guidance

11. The current corporate Procurement Code ([Part Two](#)) at Rule 34 stipulates “In cases where a supplier become (or is about to become) insolvent and an insolvency practitioner becomes involved in the business, the City's standard form contracts allow the City to terminate the supplier's engagement. On occasion it may be that the insolvent supplier's business will be acquired by a third party as a going concern. In such cases the views of the Comptroller and City Solicitor's office must be sought as to whether a novation agreement will be required. The views of the Chamberlain's division must also be sought as regards conducting a due diligence exercise on the new owner of the business. City Procurement must therefore seek the advice of the Comptroller and City Solicitor's office when it becomes aware that suppliers have been acquired as identified above or where an approach has been made by a supplier to involve a third party in managing the contract. Contract Managers must also notify City Procurement if they become aware of their supplier being acquired so that the review can be undertaken by City Procurement and the Comptroller and City Solicitor's office.”
12. Other rules/controls designed to minimise risks due to insolvencies were previously, defined within the Control of Projects Manual (CoPM) (Appendix 1) and in the “*Procedures for Creditors in Liquidation*” (Appendix 2). While compliance with the current Procurement Code is mandatory, continued compliance with the CoPM and the *Procedures for Creditors in Liquidation* is not. It was established that this previous more detailed guidance is now largely unknown to staff who have joined the City in recent years. Neither of these documents has been updated or replicated in the current suite of control documents.

Priority	Issue	Risk
Amber	There is currently a lack of detailed corporate guidance for officers to help co-ordinate their efforts when dealing with insolvencies.	The current lack of guidance is increasing the risk that additional recoverable costs may not be set off against other sums owed.
<p>Recommendation 1:</p> <p>The Chamberlain's Head of City Procurement should ensure that;</p> <p>(i) the insolvency guidance previously published in the Control of Projects Manual (Appendix 1), and the guidance applicable to the CBIS Payments and Data Team (Appendix 2), are updated to reflect modern communication practices as well as current departmental structures,</p> <p>(ii) this updated guidance is developed in consultation with the Comptroller and City Solicitor's Contracts and Litigation Sections, and those other departments as required, and</p> <p>(iii) this revised guidance is published in the Procurement Code to ensure a wide circulation amongst staff.</p> <p>(MK Ref: 01849)</p>		

Management Response and Action Plan

The recommendation is noted and will be actioned by the City Procurement Business Enablement team who will review the now out of date guidance, refresh it making sure it is widely consulted with appropriate areas of the Corporation (including Comptrollers) and provide new up to date guidance. Once this new process guidance is complete and approved, City Procurement will edit the City Procurement Code 2015 to make reference to the new guidance and processes.

Responsibility: Head of City Procurement, Policy and Compliance Officers

Target Implementation Date: Revised Guidance – April 2016, Procurement Code edits by June 2016.

Co-ordination

13. The co-ordination of this system is of considerable importance as it enables the speedy reaction to situations as they develop and both the communication and recording of insolvency details is integral to this process. The primary IT systems used for this updating/recording of a firm's status to one of insolvency is (i) KMX (Document Management System, controlled by the Comptroller and City Solicitor) and (ii) CBIS (Inactivation of Suppliers, controlled by the Payments and Data team).
14. When interviewed, officers were generally aware of the need to co-ordinate communication and actions with other officers, when they acquire information about a possible insolvency, but there is no longer a specific requirement for them to follow, other than in rule 34 of the Procurement Code referred to above, nor is there any direction as to how the information is to be shared and recorded.
15. This review therefore sought to verify the details recorded in respect of 16 of the City's Suppliers who were known to have gone into Administration, Liquidation or Receivership between 2006 and 2015. Of these 16 firms only one was found not to have had its status updated on either CBIS or KMX (Broadcast Support Services Ltd (BSS), City supplier number 31913). Of the remaining 15 firms, all were found to have been marked as Inactive on CBIS suspending further payments, but two of these, The Synergy Group Limited (Supplier Number 18985) and 16 Hoxton Square Limited (Supplier Number 25872) had no supporting notations in the "Supplier note" field to explain when each firm had been marked as inactive, whether this was the result of internal or external communications, nor any indication of the officer co-ordinating the reconciliation of amounts due from and owing to the firms.
16. Update of the CBIS "Supplier note" field is a primary control in this system as the

accessibility of CBIS across all departments assists in the co-ordination of a consistent corporate wide approach, by conveying key information to all CoL departments. This review therefore considered the use of the "Supplier note" field over the 933 firms identified as Insolvent between 2006 and 2015, finding that only 63% had some data entered in this field. Further scrutiny indicated that the use of this field has declined over the period from 89% in 2006, to 53% in 2015. Further, officers also confirmed that the previously maintained "Creditors in Liquidation" file, which had acted as the central register of Insolvent suppliers, is no longer being updated with detailed information about each insolvency.

Priority	Issue	Risk
Amber	There is insufficient information being recorded on CBIS when a supplier's status is changed to inactive as a result of insolvency.	Poor communication of information making efficiency less likely and the possible recovery of sums due less attainable.

Recommendation 2:

The Chamberlain's Head of City Procurement should instruct officers to complete the CBIS "Supplier note" field with information detailing:

- (i) the date and origin of information indicating the insolvency of a supplier,
- (ii) a uniform descriptor (e.g. LIQUIDATION) making data retrieval easier,
- (iii) the location of documents received in connection with any insolvency, and
- (iv) the identity of the officer making the amendment to this field

Consideration should also be given to introducing a monitoring process to check that the "Supplier note" field is being completed when appropriate.

(MK Ref: 01850)

Management Response and Action Plan

This is an accepted recommendation and will form part of the new guidance to be produced as per Recommendation 1.

The new guidance will make clear reference to the necessity for the Supplier details to be updated on CBIS and the information to be appended to the supplier record as outlined in i to iv above.

We will also produce a recommended monitoring process to be managed by City Procurement and the Chamberlain's CBIS team.

Responsibility: Head of City Procurement, Policy and Compliance Officers and the Senior Procurement Projects Officer.

Target Implementation Date: April 2016

Initial and On-going Financial Appraisals

17. The current corporate Procurement Code ([Part One](#)) at paragraph 36.1 stipulates that *“City Procurement are responsible in conjunction with the Chamberlain’s Financial Division for ensuring that appropriate steps have been undertaken to appraise the financial standing of the contractor and any other risks for contracts with an estimated value over the EU threshold for supplies or services” (currently £172,514) “and valued £400,000 or more for works.”* (Note the £172,514 threshold reference should be changed to £164,176 as of the 1st January 2016.)
18. We found that there is a well-developed process in place within the Chamberlain’s Corporate Treasurers Unit (CTU) for the financial appraisal of suppliers. This service is generally requested prior to contracts being entered into, and for the on-going monitoring of Supplier Company Accounts where firms are being used on contracts, with a term exceeding one year, and/or their current Company Accounts are due to be renewed before expiration of the term.
19. CTU officers carry out these evaluations in compliance with the detailed guidelines in place, along with a comprehensive list of specific checks and actions, when financially appraising firms and establishing the “Contract” and/or “Workload” limits to be assigned to each firm. When a financial appraisal is completed officers write to the officer that requested the financial appraisal conveying the results of the appraisal.
20. Financial Appraisal results were reviewed in respect of 30 companies being considered for various contracts and framework agreements prior to their invitation to tender. Of these 30 firms, four were not approved for use due to concerns identified by the financial appraisal process, two firms were not approved for use as they were unable to submit their Full Company Accounts for scrutiny, and one firm who had initially submitted its Full Company Accounts, and been approved, was then identified by the on-going monitoring process and effectively ‘rested’ when it failed to submit current accounts some two months after they were due.
21. Various control documents were also reviewed in respect of firms subject to on-going appraisals in relation to (i) the Guildhall Catering Approved List, (ii) the ESPO Security Services Framework Agreement, and (iii) the LCP Major Works Framework Agreement. It was therefore verified that there is on-going financial appraisal of a further 42 firms previously approved for use on the City’s contracts.

22. This review also requested the financial appraisal results of the firm BSS Ltd, referred to above, but found that the CTU had never been requested to carry out a financial appraisal of this firm. We therefore requested that the CTU carry out a financial appraisal of BSS Ltd based upon its last submitted company accounts for the year ending 31 March 2014 as if it had been considered for the CoLP Action & Know Fraud System and Associated Services. This financial appraisal highlighted various concerns regarding an over reliance upon a small number of clients and recognised pension liabilities, but nevertheless concluded that *“Based on these accounts, the company appeared financially satisfactory to undertake the contract against the City’s normal criteria as they then applied (October 2014)”*.

Recovery of Additional Costs

23. In the past, notifications of insolvency were passed to the Comptroller and City Solicitor’s Contracts or Litigation Sections to carry out a reconciliation considering the potential amounts owed to the City by the insolvent firm. This would involve the identification of contracts outstanding with the firm, consideration of any potential over/under payments on contracts, outstanding rents, outstanding rates etc. When this reconciliation was completed the Litigation Section would then consider whether or not to employ a ‘right of set off’ against any amounts still owed to the firm.

24. Interviews with staff indicate that this reconciliation exercise is no longer undertaken by the Comptroller and City Solicitor and we have been unable to confirm that it is actually being undertaken elsewhere.

Priority	Issue	Risk
Amber	It is currently uncertain which departmental team is responsible for the reconciliation of outstanding amounts owed to and from insolvent firms. We consider that given the current structure of the City Procurement Team, its responsibility in maintaining a corporate contracts register, and its ability to speedily identify those contracts and framework agreements in which particular firms are employed, this function would be best placed within City Procurement.	There is a risk that insufficient co-ordination of the reconciliation process could lead to a payment being made on one contract when amounts are still owed to the City on others.

Recommendation 3:

The Chamberlain's Head of City Procurement should clarify roles and responsibilities to ensure that the reconciliation process used to identify additional costs or amounts due to the City, as a consequence of a firm's insolvency, is in future, undertaken by the City Procurement Team, and that any decision to exercise a right of set off against other amounts owed is taken after liaison with the Comptroller and City Solicitor's Assistant City Solicitor (Litigation and Contracts).

(MK Ref: 01851)

Management Response and Action Plan

City procurement will consult with Comptrollers over this area of responsibility and devise a clear process on who is responsible for which tasks to ensure the financial recovery process is effective.

Responsibility: Head of City Procurement, Policy and Compliance officers and Comptrollers Head of Contracts team.

Target Implementation Date: June 2016

APPENDIX 1: Past Corporate Requirements for Insolvency Risks

Following is an excerpt from CoL Control of Projects Manual - Appendix 12 (2010)

LIQUIDATION OF CONTRACTORS AND CONSULTANTS

Introduction

If a contractor ceases trading on a building or engineering contract there is a need for urgent action to be taken to secure appropriate sites and appoint a completion contractor as soon as possible. Settlements with failed contractors are required to be negotiated for the Corporation as a whole and one payment made to or from the relevant liquidator/receiver. It is therefore necessary for actions of the Corporation to be co-ordinated.

The following is a schedule of the main aspects to be considered when dealing with a contractor in liquidation. For more detailed guidance reference should be made to the publication "Insolvency of Building Contractors 2nd Edition" issued by the Society of Chief Quantity Surveyors in Local Government in September 1988.

Main procedures to be followed:-

1. Any rumours or unconfirmed reports that a contractor is suffering financial difficulties are to be reported to the Head of the Department who shall liaise with the Chamberlain (Financial Services Division) who shall then agree what action needs to be taken and if any other departments need to be informed.
2. Upon the failure of a consultant or contractor no further payments to the company are to be certified. The Chamberlain (Financial Services Division and Systems and Records Section) shall suspend all payments to the company until written approval has been received from the Comptroller and City Solicitor (Litigation Section). The company is not to be invited to tender for any further projects.
3. All outstanding contracts with the company should be immediately identified and any sites made secure. This will include the securing of any unfixed materials, plant and machinery etc. until ownership has been ascertained. Contractors can be appointed under emergency procedures to ensure sites are secure and are left in a safe condition if necessary. Details should be forwarded to the Chamberlain (Financial Services Division) and the Comptroller and City Solicitor (Litigation Section).
4. The Comptroller and City Solicitor (Litigation Section) shall represent the Corporation in dealings with the liquidator/receiver.
5. The Comptroller and City Solicitor (Litigation Section) should ascertain whether the liquidator/receiver intends to arrange for the completion of any outstanding projects and inform the technical departments and the Chamberlain (Financial Services Division) accordingly.

6. Outstanding works on projects are to be identified and revised specifications prepared if necessary.
7. Alternative contractors to complete outstanding projects should be appointed in accordance with chapter 6.
8. Details of any additional supervision and administration time spent on undertaking the completion contract must be recorded and details forwarded to the Comptroller and City Solicitor (Litigation Section) accordingly.
9. Upon completion of outstanding projects notional accounts are to be prepared indicating what the final costs would have been had the original contractor completed the project.

APPENDIX 2: Past Procedures for Creditors in Liquidation

These procedures must be followed when dealing with creditors who are in liquidation/administration/receivership.

1. Notification for freezing creditors which have gone into liquidation should come from Financial Services Division or Comptrollers & City Solicitors Department. A preliminary phone call may be made to the Payments Systems Section from the Financial Services Division or Comptrollers & City Solicitors Department to check for any outstanding payments. Confirmation, in the form of a memo, will follow.
2. The record can be frozen at the time of the phone call and a explanatory message should be inserted into the comment field on screen 771. E.g. 'IN LIQUIDATION'. If there is no record of the company on the system a new record should be created, which should be frozen immediately and a message inserted into the comment field on screen 771.
3. All requests and subsequent action taken on the creditors system by an administrator from the Payments Systems Section must be checked by another administrator from the Payments Systems Section.
4. Written requests for freezing creditors should be initialled and dated by an administrator from the Payments Systems Section and any action taken noted on the request. This should then be filed alphabetically in the 'Creditors in Liquidation' file. If the request to freeze the creditor was taken over the phone a screen print should be taken, which should also be signed and dated and a note of the person who requested the freeze should be made on this print. This should also be filed alphabetically in the 'Creditors in Liquidation' file, awaiting written confirmation.
5. The form contained at the front of the 'Creditors in Liquidation' file should be completed to keep a record of any action to freeze a creditor in liquidation. This should include Creditor No, Creditor Name, details of action taken, date of action, name of person who requested action, initials of person who amended system, initials of person who checked request and amendment and date confirmation memo received.
6. Notification to remove the block on frozen creditors in liquidation should only come from Financial Services Division or Comptroller & City Solicitors Department. This will come in the form of a phone call which will be followed up by a written confirmation. Under no circumstance must creditors be unfrozen following a request from creditor users.
7. Written requests for unfreezing creditors should be initialled and dated by an administrator from the Payments Systems Section and any action taken noted on the request. This should then be filed alphabetically in the 'Creditors in Liquidation' file. If the request to unfreeze the creditor was taken over the phone a screen print should be taken, which should also be signed and dated and a note of the person who requested the creditor to be unfrozen should be made on this print. This should be filed with the original request to freeze the creditor in the 'Creditors in Liquidation' file, awaiting written confirmation.
8. The form contained at the front of the 'Creditors in Liquidation' file should be completed to keep a record of any action undertaken on a creditor in liquidation.
9. When a creditor has gone into liquidation and the company name is amended to form a new company, the original creditor record should remain frozen and a new creditor record created with the new company name.

APPENDIX 3: AUDIT DEFINITIONS AND RESPONSIBILITIES

Assurance levels

Category	Definition
Nil Assurance 'Dark Red'	There are fundamental weaknesses in the control environment which jeopardise the achievement of system objectives and could lead to significant risk of error, fraud, loss or reputational damage being suffered.
Limited Assurance 'Red'	There are a number of significant control weaknesses and/or a lack of compliance which could put the achievement of system objectives at risk and result in error, fraud, loss or reputational damage.
Moderate Assurance 'Amber'	An adequate control framework is in place but there are weaknesses and/or a lack of compliance which may put some system objectives at risk.
Substantial Assurance 'Green'	There is a sound control environment with risks to system objectives being reasonably managed. Any deficiencies identified are not cause for major concern.

Recommendation Categorisations

Priority	Definition	Timescale for taking action
Red - 1	A serious issue for the attention of senior management and reporting to the appropriate Committee Chairman. Action should be initiated immediately to manage risk to an acceptable level	Less than 1 month or more urgently as appropriate
Amber - 2	A key issue where management action is required to manage exposure to significant risks, action should be initiated quickly to mitigate the risk.	Less than 3 months
Green - 3	An issue where action is desirable and should help to strengthen the overall control environment and mitigate risk.	Less than 6 months

Note:- These 'overall assurance level' and 'recommendation risk ratings' will be based upon auditor judgement at the conclusion of auditor fieldwork. They can be adjusted downwards where clear additional audit evidence is provided by management of controls operating up until the point of issuing the draft report.

What Happens Now?

The final report is to be distributed to the relevant Head of Department, relevant Heads of Service, and those involved with discharging the recommended action.

A synopsis of the audit report is provided to the Chamberlain, relevant Members, and the Audit & Risk Management Committee.

Any Questions?

If you have any questions about the audit report or any aspect of the audit process please contact Dan Doherty, Audit Manager on Ext 1299 or Anna Simmonds, Senior Audit Manager on 07972 004266, or via email to Anna.Simmonds@cityoflondon.gov.uk.

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Agenda Item 7

Committee(s) Police Committee – For information Policy and Resources – For decision Planning and Transportation – For decision	Date: 14/04/2016 14/04/2016 26/04/2016
Subject: Update report – City ATTRO	Public
Report of: Director of the Built Environment	For Decision
Report author: Clarisse Tavin, Project Manager	

Summary

A report to propose a City Anti-Terrorism Traffic Regulation Order (ATTRO) was presented to Planning & Transportation, Police, and Policy & Resources Committees in December 2015 and January 2016.

Members approved the ATTRO in principal and that a public consultation and publication of Notice of the proposal be carried out, subject to further information being presented as follows:

- Members to approve the draft Protocol between the City of London Corporation (“the City Corporation”), the City of London Police and Transport for London (TfL);
- Members to determine whether or not to proceed with the ATTRO following the statutory consultation on the ATTRO;
- An annual review of the ATTRO be presented to Members, and;
- Confirmation that the ATTRO is to be used in a proportionate manner.

Since January 2016, meetings between the City Corporation, the City of London Police and TfL have been held resulting in a draft Protocol being produced in agreement between all three parties (see Appendix 1). The proposed Protocol provides guidance on the processes between the three parties and any other agency that will need to be involved, and seeks to ensure that the ATTRO will be used in a proportionate and appropriate manner. The Protocol also provides information on the use of the ATTRO and the review process, and is to be read in conjunction with the ATTRO including the Schedule (see Appendix 2).

On the basis of the Protocol, approval has been received from TfL to include its roads in the City’s area for which it is the Highway Authority in the ATTRO. The draft ATTRO including the Schedule has therefore been updated to reflect this (see Appendix 2).

Neighbouring boroughs have been approached and informed about the proposed ATTRO. However, at present, it is not proposed to include their boundary roads with the City in the ATTRO (see map in Appendix 3). If it is subsequently agreed to include these roads, the order will be amended accordingly.

Recommendation(s)

Members are asked to:

1. Approve the commencement of the statutory process for making of the proposed ATTRO, subject to the applicable statutory processes;

2. Approve the proposed draft Protocol in Appendix 1;
3. Authorise the Director of the Built Environment or a delegated officer to carry out consultation and publication of Notice of the proposal to make the ATTRO;
4. Note that the outcome of the statutory notice procedures and consultation responses will be reported to the Planning and Transportation and Policy and Resources Committees, for those Committees to determine whether or not to proceed with the ATTRO and/or other next steps;
5. Authorise the Comptroller and City Solicitor or a delegated officer to enter into any necessary agreements under Section 101 of the Local Government Act 1972 with Transport for London to carry out the statutory steps associated with the proposal, notification and making of the ATTRO on TfL roads on their behalf;
6. In the event of any neighbouring traffic authorities agreeing to their boundary roads with the City being included in the ATTRO, (a) authorise the Comptroller and City Solicitor or his delegated officer to enter into any necessary agreements under Section 101 of the Local Government Act 1972 (or other joint working agreements); and (b) authorise the Director of the Built Environment or her delegated officer to amend the ATTRO to include boundary roads with neighbouring traffic authorities, as the relevant traffic authorities may agree (and subject to all necessary statutory processes).

Main Report

Background

1. In July 2015, the Commissioner of City of London Police requested formally that an ATTRO be made by the City Corporation, for the City of London area.
2. Subsequently, the ATTRO report was presented to Planning and Transportation Committee on 15th December 2015, Police and Policy and Resources Committees on 21st January 2016. Members approved the ATTRO in principal subject to the following:
 - Members to approve the draft Protocol between the City of London Corporation, City of London Police and TfL;
 - Members to determine whether or not to proceed with the ATTRO following the statutory consultation on the ATTRO;
 - An annual review of the ATTRO being presented to Members, and;
 - Confirmation that the ATTRO is to be used in a proportionate manner.

Current Position

3. This update report provides information on how the order would operate and clarifies the ATTRO processes between the City Corporation, the City of London Police and TfL as requested by Members.
4. Since January 2016, further meetings and workshops have been held between the City of London Police and TfL and resulted in the production of a joint Protocol, and TfL agreeing to include its roads in the City for which it is the Highway Authority.
5. In order to further ensure that the ATTRO is proportionate and to provide additional transparency in how it is operated, a draft Protocol has been

developed jointly between the City Corporation , the City of London Police, and TfL (see Appendix 1).

6. The proposed Protocol is to be read in conjunction with the ATTRO including the Schedule (see Appendix 2), and sets out arrangements regarding the provision for advance notice, and operating the 48 hour time limit on any restrictions. This is to ensure that the ATTRO is a proportionate measure, used to the minimum extent necessary and suspended as soon as circumstances permit.
7. The Protocol also specifies that an annual review of the ATTRO will be carried out by the City Corporation, the City of London Police, and TfL, and reported back to Members. This will allow for continuous checks and adjustments if required. Post-implementation reviews will also be conducted and reported to Members.
8. It should be noted that the current legislation specifies that a police officer of the rank of a constable can enable commencement, suspension or revival of restrictions of an ATTRO. However, in order to provide re-assurance that the commencement of restrictions under the ATTRO will be scrutinised and approved at an appropriate level, it has been agreed and set out in the Protocol that the City ATTRO will only be authorised by a City of London Police Officer of the rank of superintendent or higher (unless the superintendent is unavailable in which case it may be authorised by an inspector, as long as it is approved by a superintendent as soon as practicable).

Corporate & Strategic Implications

9. Nationally, the Government has a well-documented counter terrorism strategy known as CONTEST. One of the four strands of this National Strategy is titled PROTECT. The police are able to better protect the City community through the application of the ATTRO powers. These powers were introduced by the Civil Contingencies Act 2004.
10. Locally, The City Together Strategy has five themes. Two of these themes are relevant directly to the issue of an ATTRO.

- Supports our communities

To improve people's health, safety and welfare within the City's environment through proactive and reactive advice and enforcement activities.

- Safer and stronger

To continue to ensure the City is a safe place in which to do business, work, visit, and live.

11. The City of London Local Plan 2015 aims to ensure that the City remains a safe place to work, live and visit. Core Strategic Policy CS3 makes specific provision for implementing measures to enhance the collective security of the City against terrorist threats, applying security measures to broad areas, including the City as a whole. The Policy also encourages the development of area-based approaches to implementing security measures.

12. Within the framework of the Safer City Partnership, counter-terrorism is one of eight priorities for improving the City's security, and a Counter-Terrorism Thematic Group is chaired by the Assistant Commissioner. The need and actions associated with an ATTRO is being monitored by that group.
13. The Local Policing Plan for 2015-18 has as an Outcome that "the City of London is protected against the threat from terrorism and remains a safe place for all". The plan states: "the threat from terrorism and extremism remains high and is becoming more diverse and complex in how it is manifested. The City of London's historical, cultural and economic importance means it will always be an attractive target for those intent on causing high profile disruption...By continuing to protect the City of London from terrorism we will continue to protect the UK's interests as a whole". In terms of prevention, the plan states: "We will continue to work in partnership with the City of London Corporation to enhance security measures across the City of London."
14. The City of London is vulnerable to terrorist attack due to the concentration of high profile historic, prestigious and financial targets. Consequently, this risk is high on the current Corporate Strategic Risk Register.

Legal implications

15. **Statutory power to make the ATTRO** – Sections 6, 22C and 22D of the Road Traffic Regulation Act 1984 (as amended by the Civil Contingencies Act 2004) enables traffic orders to be put in place by the traffic authority for the purposes of avoiding or reducing the likelihood of danger connected with terrorism, or preventing or reducing damage connected with terrorism.
16. **Statutory duties of traffic authority** - As traffic and highway authority, the City Corporation has the duty to secure the expeditious, convenient and safe movement of traffic (having regard to the effect on amenities) (S122 Road Traffic Regulation Act 1984) and the duty to secure the efficient use of the road network avoiding congestion and disruption (S16 Traffic Management Act 2004). The Schedule to the ATTRO sets out requirements aimed at meeting these duties by ensuring that any restrictions will be the minimum necessary to remove or reduce the danger and are consistent with the statutory requirements for making ATTROs. In implementing the ATTRO the traffic impacts of restricting or prohibiting traffic to roads within the City, including, potentially, pedestrian traffic, will be considered. In the event of a threat, the disruption to traffic flow would also have to be weighed against the threat of more severe disruption and greater risk being caused due to failure to prevent an incident.
17. By way of further controls, the Schedule to the draft ATTRO requires that in most cases at least seven days' notice of any restrictions must be given to persons likely to be affected (unless this is not possible due to urgency or where the giving of notice might itself undermine the reason for activating the ATTRO), and notice must also in any event be given to the City Corporation, TfL and other affected traffic. The arrangements are further explained in the Protocol.

18. **Human Rights and Proportionality** - In considering the request for an ATTRO, regard has been given to the duty to act in accordance with the European Convention on Human Rights. In relation to possible restriction of access to property, any interference with Article 1 rights to enjoyment of property must be justified. Interference may be regarded as justified where it is lawful, pursues a legitimate purpose, is not discriminatory, and is necessary. It must also strike a fair balance between the public interest and private rights affected (i.e. be proportionate). It is considered that the public interest in being protected by the existence and operation of the ATTRO can outweigh interference with private rights which is likely to occur when restrictions are in operation. The scope of restrictions must be proportionate and should only last until the likelihood of danger or damage is removed or reduced sufficiently in the judgment of a senior police officer. The Schedule to the ATTRO sets out arrangements (further expanded in the Protocol) for ensuring that any interference is proportionate. Given the risks to life and property which could arise if an incident occurred, and the opportunity provided by the ATTRO to remove or reduce the threat of and/or impacts of incidents, it is considered that the ATTRO can be justified and any resulting interference legitimate.
19. Leading Counsel has reviewed the proposed arrangements and has advised that, with some modifications (which have been adopted in the proposals before you), the recommendations are ones which the City Corporation may properly and reasonably agree.

Outline Programme:

- April 2016: City London Corporation Committees
- May 2016 : ATTRO to be advertised and start of the three week statutory consultation period
- June/July 2016: Results of consultation and recommendation whether or not to proceed with the ATTRO to be reported to the Planning and Transportation and Policy and Resources Committees to decide whether or not to make the ATTRO.

Appendices

- Appendix 1 – Protocol
- Appendix 2 – Draft Traffic Regulation Order & Schedule
- Appendix 3 – ATTRO map

Background Papers:

- “Anti-Terrorism Traffic Regulation Order report” presented at Planning and Transportation Committee on 15th December 2015, Police and Policy and Resources Committees on 21st January 2016.

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Protocol for Commencing, Suspending and Reviving the City of London (Protective Measures) (No. 1) Traffic Regulation Order 2016

1.0 Introduction

1.1 The Road Traffic Regulation Act 1984 (RTRA 1984) allows for traffic regulation orders to be made specifically for the purposes of avoiding (or reducing the likelihood), of danger associated with terrorism. This is referred to as an Anti-Terrorism Traffic Regulation Order. It can be used to restrict vehicular and/or pedestrian traffic temporarily or permanently for counter-terrorism purposes.

1.2 The City of London (Protective Measures) (No. 1) Traffic Regulation Order 2016 (the “ATTRO”) was requested by the Commissioner of Police and is based on advice received from the Police Commissioner’s counter-terrorism security advisers, and protective security experts from the Centre of Protection of National Infrastructure (CPNI) ([Web link to be inserted](#)). The advice relates to the whole of the City of London having regard to its intensely crowded nature and role as a high profile world centre of economic activity. In addition, there are a range of threats to iconic buildings, critical national infrastructure and high profile gatherings such as military events. These all exist or occur within the City. The current security threat level for the UK is SEVERE, which means an attack is highly likely. Therefore in the current heightened security climate, an explicit anti-terrorism power to control access to streets in the City is now considered necessary.

1.3 Following consideration of the request the City of London Corporation (“the City Corporation”) resolved to commence the statutory procedures to make the ATTRO. [FURTHER SENTENCE TO BE ADDED IN CONSULTATION WITH TfL TO REFLECT THE MAKING OF THE ATTRO IF IT IS DECIDED TO PROCEED]

2.0 Purpose of the Protocol

2.1 This Protocol sets out the process that will be followed by the City Corporation, the City of London Police and Transport for London (TfL) in implementing the provisions of the ATTRO. It aims to ensure that it is operated in a proportionate and appropriate manner, and by providing transparency as to how it will be operated so far as can be achieved according to the circumstances. It also sets out how its implementation will be reviewed and guides the communication process between

with the City Corporation, the City of London Police, and TfL. This Protocol is to be read in conjunction with the ATTRO including the Schedule.

2.2 It is acknowledged that in operating the ATTRO it is important to balance the security benefits of a protective security scheme against the disruption to traffic, local residents and businesses. The Protocol ensures that the various parties' interests, and the public interest, are considered and the arrangements between the City Corporation, the City of London Police, and TfL are clearly outlined.

3.0 Applicable Legislation & Guidance

3.1 The ATTRO is a counter terrorism measure pursuant to the provisions of the Civil Contingencies Act 2004. It provides a statutory basis for the implementation of protective security measures, both physical and regulatory, intended to prevent or minimise the risk from vehicle borne terrorist attacks.

3.2 The Civil Contingencies Act 2004 (Schedule 2) came into effect on 19 January 2005 and extends existing road traffic regulation legislation enabling it to be applied explicitly for anti-terrorism purposes. The Act allows traffic orders to be put in place under Sections 22c of the Road Traffic Regulation Act 1984 (RTRA 1984). ([Web link to the legislation to be inserted](#))

3.3 Specifically Section 22C of the RTRA 1984 allows the making of ATTROs, both permanent and temporary for:

- Avoiding or reducing, or reducing the likelihood of, danger connected with terrorism: and
- Preventing or reducing damage connected with terrorism' as defined by Section 1 Terrorism Act 2000 ([web link to the legislation to be inserted](#))

3.4 In connection with what may require protection, Section 22C(1) includes reference to "persons and property" on or near the road.

3.5 Section 22D of the RTRA 1984 provides that an ATTRO may be made "only on the recommendation of the Chief Officer of Police for the area to which the order relates". It also includes provisions to:

- Restrict pedestrian access to premises in roads affected
- Installation of vehicle control measures e.g. activation of rising bollards

3.6 The implementation of the ATTRO must also be carried out in compliance with the European Convention on Human Rights including in relation to the possible restriction of access to property, and Article 1 rights to enjoyment of property. ([Web link to the legislation to be inserted](#))

4.0 Commencement, suspension or revival of the Order

Commencement or Revival of the Order for Urgent Situations and Pre-Planned Events

4.1 The current legislation specifies that a police officer of the rank of a constable can enable commencement, suspension or revival of restrictions of an ATTRO. In order to provide re-assurance that the ATTRO will be used in a proportionate manner, it has been agreed that the imposition of restrictions under the ATTRO may only be authorised by a City of London Police Officer of the rank of superintendent, or, if a superintendent is unavailable, a City of London Police Officer of the rank of Inspector. In the event of the restrictions being authorised by an Inspector, a superintendent's confirmation shall be sought as soon as practicable. If the restriction is not confirmed by the Superintendent it shall cease. The ATTRO enables access to one or more streets in the City's area to be restricted including roads which form part of the Transport for London Road Network (TLRN). The City Corporation and TfL, must be given prior notice, which should be at least seven days or as soon as practicable.

4.2 It is the City of London Police (and in particular the security specialists within the Police), which have access to the intelligence as to whether a specific building or area constitutes a terrorist target. The ATTRO will only be implemented under the direction of the City of London Police, where the Superintendent (or, if he/she is unavailable the Inspector) is satisfied that there is sound reason to do so on the basis of a security assessment or intelligence of a likelihood of danger or risk of damage connected to terrorism.

4.3 Different circumstances may initiate the implementation of the ATTRO based on security assessment or intelligence of a threat, and could result in requiring an ATTRO for an urgent situation or pre-planned events. The details of these processes are included in the Appendix 1a and 1b.

4.4 The decision to implement the ATTRO in an urgent situation, and the process that follows will be led by City of London Police who will regularly review the position in the light of intelligence available. In these circumstances the Town Clerk and TfL must be consulted as soon as reasonably practicable. The flow chart in Appendix 1a details this process in more detail.

4.5 The decision to implement the ATTRO for a pre-planned event will be made by City of London Police but the process that follows will be led by the City Corporation in conjunction with TfL as the Highway Authorities. In these circumstances notice of the impending restrictions will be publicised allowing the City Corporation, TfL and neighbouring traffic authorities affected the opportunity to put in place measures to mitigate the adverse effects on traffic and people (see details in the Notification section below). The flow chart in Appendix 1b details this process in more detail.

4.6 The ATTRO will not be used for pre-planned events where there is no risk of danger or damage connected with terrorism.

4.7 Liaison between the City Corporation, City of London Police, and TfL is essential to ensure effective and acceptable implementation of the ATTRO which balances the needs of security with the impact on local residents, local businesses and traffic flow.

4.8 In addition, a Police Constable in uniform will have discretion to waive restrictions on a case by case basis.

Suspension of the Order

4.9 The Order is to be suspended as soon as the City Police of the rank of Superintendent or above is satisfied that the likelihood of danger or damage connected with terrorism relied upon to commence or revive the Order is removed or adequately reduced. The City Corporation and TfL will need to be informed immediately or as soon as reasonably practicable.

Notification

4.10 The aim is to provide Notice to affected stakeholders (including the public) as soon as practicable of any restrictions which are to be put in place.

4.11 The City Corporation and TfL will utilise its normal channels of communication to notify affected stakeholders that the ATTRO has been implemented. Notice of Intent to commence, suspend or revive the Order will be published at least 7 days before the proposals take effect (see draft Notice in Appendix 2) as follows:

- Social media;
- City of London website;
- Publication in the Evening Standard;
- On-street notice;
- Distribution direct to the City's key stakeholders such as businesses, residents, neighbouring authorities, other interest groups and disability groups who may be affected;
- TfL notification channels.

4.12 If the giving of the Notice of Intent is not considered appropriate for example due to urgency or national security, the arrangements in paragraph 4.10 will not be used, but shorter notice that the ATTRO is to be made, or notice that it has been made will be given using the following channels of communication:

- Social media;
- City of London website;
- TfL notification channels.

5.0 Review

5.1 After a maximum period of 48 hours, all restrictions will be lifted unless an extension is approved by the City of London Police Commissioner, the Town Clerk and TfL. Reasons to support an extension will need to be presented by the City of

London Police to the City Corporation and TfL and any extension will be for the minimum period necessary having regard to the specific circumstances. Regular meetings will be held between the City Corporation, the City Police and TfL to keep the requirement for the restrictions under review and ensure the restrictions can be removed or modified as soon as practicable.

5.2 Where the restrictions under the ATTRO have been put in place for urgent situations, continuous reviews of the restrictions will be organised by the City of London Police Extraordinary Security Group (Gold Level), chaired by Commander Operations, as soon as the intelligence suggests the restrictions may be reduced or modified and in any event within 24h following their introduction. The purpose of the reviews is to ensure the restrictions are removed or modified as soon as practicable having regards to the specific circumstances and to the likelihood of danger or damage connected with terrorism, or the effectiveness of the measures currently in place.

5.3 The ATTRO will be jointly reviewed annually by the City Corporation, City of London Police and TfL (and where appropriate neighbouring traffic authorities). This will allow for regular checks and adjustments to be made in the light of experience. The review will be reported to the Planning & Transportation and the Policy and Resources Committees.

5.4 A multi-agency training programme involving representatives from the City Corporation City of London Police and TfL, and will be put in place to ensure that the ATTRO is applied consistently and in line with the Protocol. The multi-agency Protocol will also be the subject of regular review.

6.0 Enquiries/Observations

6.1 Enquiries and observations about the implementation of the ATTRO should be directed to:

Director of the Built Environment
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

dbe@cityoflondon.gov.uk

Appendices

Appendix 1a&b – Flow Charts for urgent situations and pre-planned events.
Appendix 2 - Draft notice of intent

Glossary

Gold (strategic) Command Tier

In response to an emergency (as defined in the Civil Contingencies Act 2004), or to a major incident, or in a planned response to an event involving the emergency services and/or other partner agencies, a gold (strategic) tier of command should be established and a strategic coordinating group (SCG) should be formed. The police gold commander usually chairs the SCG.

Silver (tactical) Command Tier

At both spontaneous incidents and planned events where silver (tactical) commanders are appointed by the police and other emergency services, consideration must be given to how they and their personnel will communicate and coordinate with each other.

Bronze (operational) Command Tier

The nature, extent and autonomy of interoperability at bronze (operational) tier is based on the scale and nature of the incident or event and is defined by parameters set by the silver (tactical) commander.

Useful References

Traffic Management Act 2004: www.gov.uk/traffic-management-act

Highways Act 1980 (amended): www.legislation.gov.uk/ukpga/1980/66

Local Authorities Traffic Orders (Procedure)(England) Regulation Orders:
www.legislation.hmso.gov.uk/si/si1996

Centre for the Protection of National Infrastructure (CPNI):
enquiries@cpni.gsi.gov.uk

Civil Contingencies Act: www.legislation.hmso.gov.uk/acts/acts_2004

www.dft.gov.uk

Terrorism Act 2000

European Convention on Human Rights

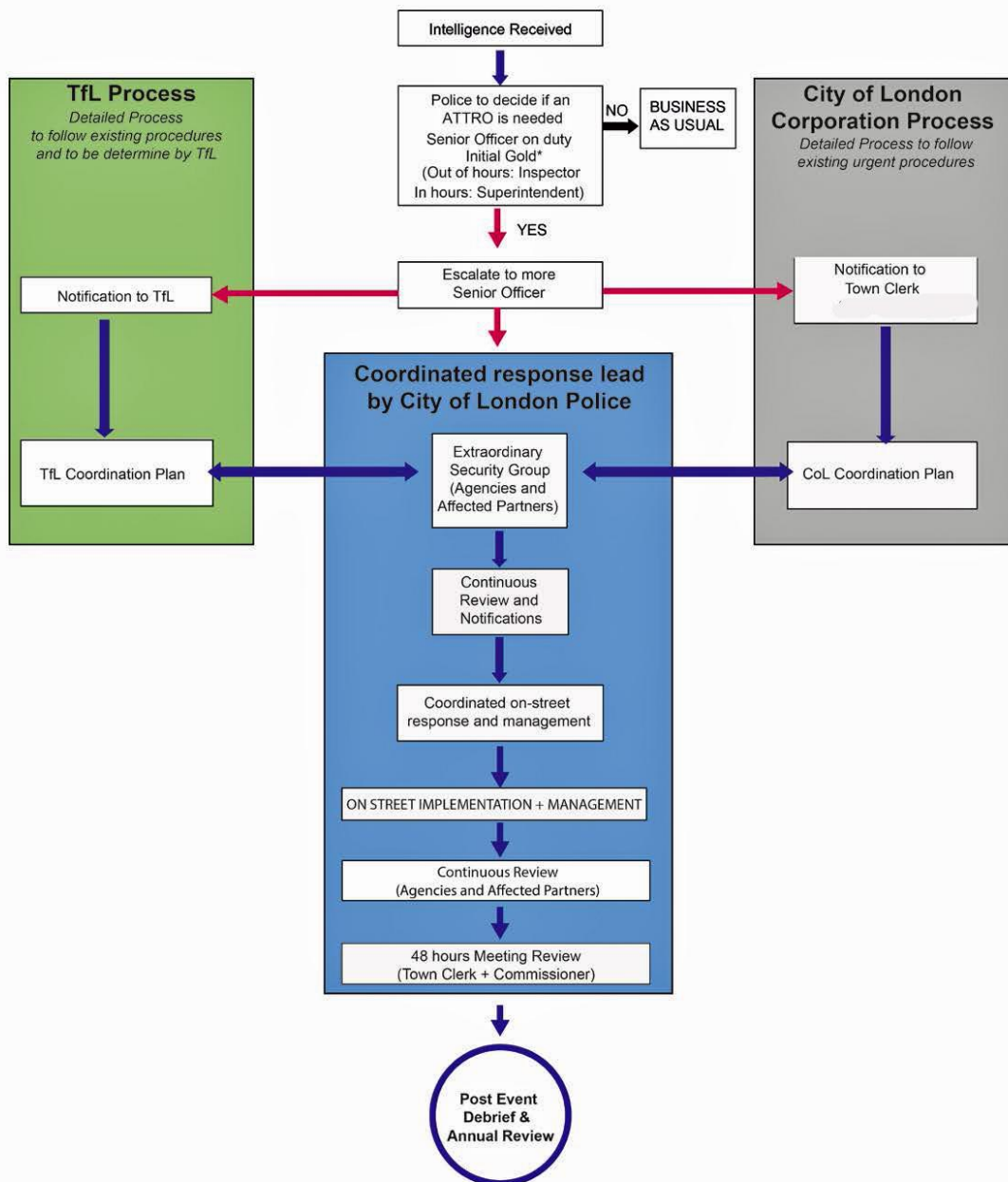
Human Rights Act 1998: www.equalityhumanrights.com

www.gov.uk/terrorism-national-emergency

Local Policing Plan for 2015-2018

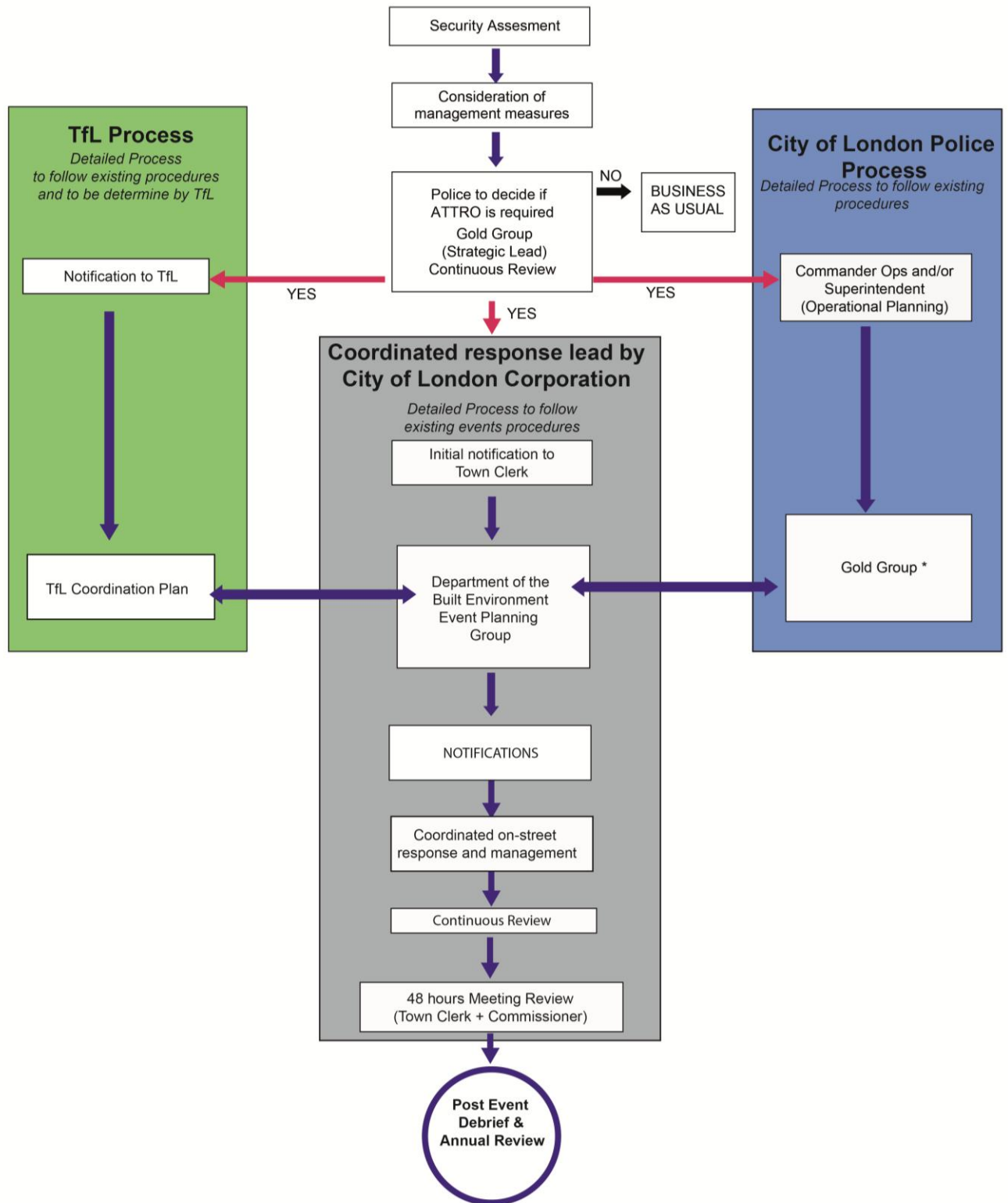
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PROTOCOL Appendix 1a – Flow Chart for Intelligence Lead in an urgent situation



***Gold (strategic) command tier:**
 In response to an emergency (as defined in the Civil Contingencies Act 2004), or to a major incident, or in a planned response to an event involving the emergency services and/or other partner agencies, a gold (strategic) tier of command should be established and a strategic coordinating group (SCG) should be formed. The police gold commander usually chairs the SCG.

PROTOCOL Appendix 1b – Flow Chart for Pre planned event



***Gold (strategic) command tier:**
 In response to an emergency (as defined in the Civil Contingencies Act 2004), or to a major incident, or in a planned response to an event involving the emergency services and/or other partner agencies, a gold (strategic) tier of command should be established and a strategic coordinating group (SCG) should be formed. The police gold commander usually chairs the SCG.

PROTOCOL - Appendix 2 – Draft Notice of intent

CITY OF LONDON

Notice is hereby given that the Common Council of the City of London as traffic authority for the undermentioned roads will commence/suspend/revive the City of London (Protective Measures) (No.1) Order 2016 in the undermentioned roads on “**Date /Month/ Year/ Times**” The effect of these Orders will be to prohibit vehicles (or pedestrians where stated) from entering the undermentioned roads on the dates and times specified for the purpose of avoiding or reducing the likelihood of danger connected with terrorism or preventing or reducing damage connected with terrorism

ROAD TO WHICH THIS NOTICE APPLIES.

[roads to be listed]

For further information please refer to www.cityoflondon.gov.uk/streetworks.

Enquiries to Traffic Management Services on 020 7332 ****

Carolyn Dwyer BEng (Hons), DMS, CMILT, FCIHT
advert date
Director of the Built Environment

Dated **Insert**



Appendix 2 : Draft Traffic Regulation Order & Schedule



TRAFFIC MANAGEMENT ORDER

201* No. *

The City of London and Transport for London (Protective Measures) (No.1) Order 201*

Made:

Coming into operation:

The Common Council of the City of London and Transport for London on the recommendation of the Commissioner of Police for the City of London in exercise of the powers conferred by sections 6, 22C, 22D and 124 of and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984, section 8 of and Part I of Schedule 5 to the Local Government Act 1985 and of all other powers thereunto enabling hereby make the following Order:-

1. This Order shall come into operation on *** and may be cited as The City of London and Transport for London (Protective Measures) (No.1) Order 201*.

2. In this Order:-

“Boundary Road” means any road with a boundary along its length having, on one side of the boundary an area for which the Common Council of the City of London is the traffic authority and on the other side of the boundary an area for which a neighbouring borough is the traffic authority.;

“Enactment” means any enactment whether public general or local and includes any order, byelaw, rule, regulation, scheme or other instrument having effect by virtue of an enactment and any reference in this Order to any enactment shall be construed as a reference to that enactment as amended, applied, consolidated, re-enacted by or as having effect by of any subsequent enactment;

“Terrorism” has the same meaning as in section 1 of the Terrorism Act 2000(c); and

“Traffic authority” has the same meaning as in section 121(A) of the Road Traffic Regulation Act 1984.

3. No person shall enter or proceed in, or cause a vehicle to enter or proceed in, any road or length of road within the boundary of the City of London for which the Common Council of the City of London or Transport for London is the traffic authority (other than a Boundary Road).

4. Article 3 of this Order shall be commenced, suspended or revived at the direction of a police officer of the City of London Police of the rank of Inspector or above to such extent and for such period as they may specify. Any direction of such police officer shall be given in accordance with the Schedule to this Order and shall have regard to any Protocol for the time being in force between the Common Council of the City of London,, the City of London Police and TfL.
5. Nothing in Article 3 of this Order shall apply to anything done with the permission or at the direction of a City of London police constable in uniform.
6. So far as the prohibition in this Order conflicts or is inconsistent with the provisions of any other Order made under the Road Traffic Regulation Act 1984, the prohibition in this Order shall prevail.

Dated this * day of ** 201*

Transportation and Public Realm Director

SCHEDULE

Criteria for Commencing, Suspending and Reviving The City of London and Transport for London (Protective Measures) (No. 1) Traffic Regulation Order 201* (“the Order”).

(1) Criteria for commencement, suspension or revival

The Order will only be commenced, suspended or revived, and only to the extent necessary, for the following purposes:

1. avoiding, or reducing the likelihood of, danger connected with terrorism; and
2. preventing or reducing damage connected with terrorism.

(2) Commencement or Revival of the Order

The Order may not be commenced or revived unless a City of London Police officer of the rank of Inspector or above is satisfied that they have sound reason for doing so based on a specific threat or specified intelligence that there is a threat of danger or damage connected with terrorism. On reaching that decision, they shall, as soon as reasonably possible, begin the notification procedure set out in paragraph (4), below.

(3) Suspension of the Order

Once the Order has been commenced or revived it will be suspended as soon as a City of London Police officer of the rank of Inspector or above is satisfied that the likelihood of danger or damage connected with terrorism relied upon to commence or revive the Order is removed or reduced, The Order may be suspended in part if the preceding circumstances arise only in respect of part of the operation of the Order.

(4) Notification

1. Before commencing, suspending or reviving the Order the City of London Police must publish a notice (in this Order called “notice of intent”) briefly describing the general nature and effect of the proposals, and naming or describing the roads to which the proposals relate (unless the giving of such notice is considered inappropriate having regard to its purpose or cannot be given due to urgency)
2. Subject to paragraph 4.1 above a notice of intent must be publicised in such ways as may be appropriate for the purpose of informing persons likely to be affected by the proposals at least seven days before the proposals take effect or as soon reasonably practicable (or such lesser period as may be appropriate having regard to the circumstances).
3. The Order must not be commenced, or revived unless the City of London Police have given prior notice of the proposals to the Common Council of the City of London, Transport for London, and any other traffic authorities likely to be affected by the proposals at least seven days before the proposals take

effect or as soon as reasonably practicable (or such lesser period as may be appropriate having regard to the circumstances).

4. Where the decision is made to suspend the Order (or any part of it) the City of London Police shall notify the Common Council of the City of London, Transport for London, and any other traffic authorities affected of the suspension as soon as possible after the decision is made to suspend the Order (or any part of it).

(5) Criteria for determining the extent of the restrictions

The Order will only be commenced or revived in accordance with the following:

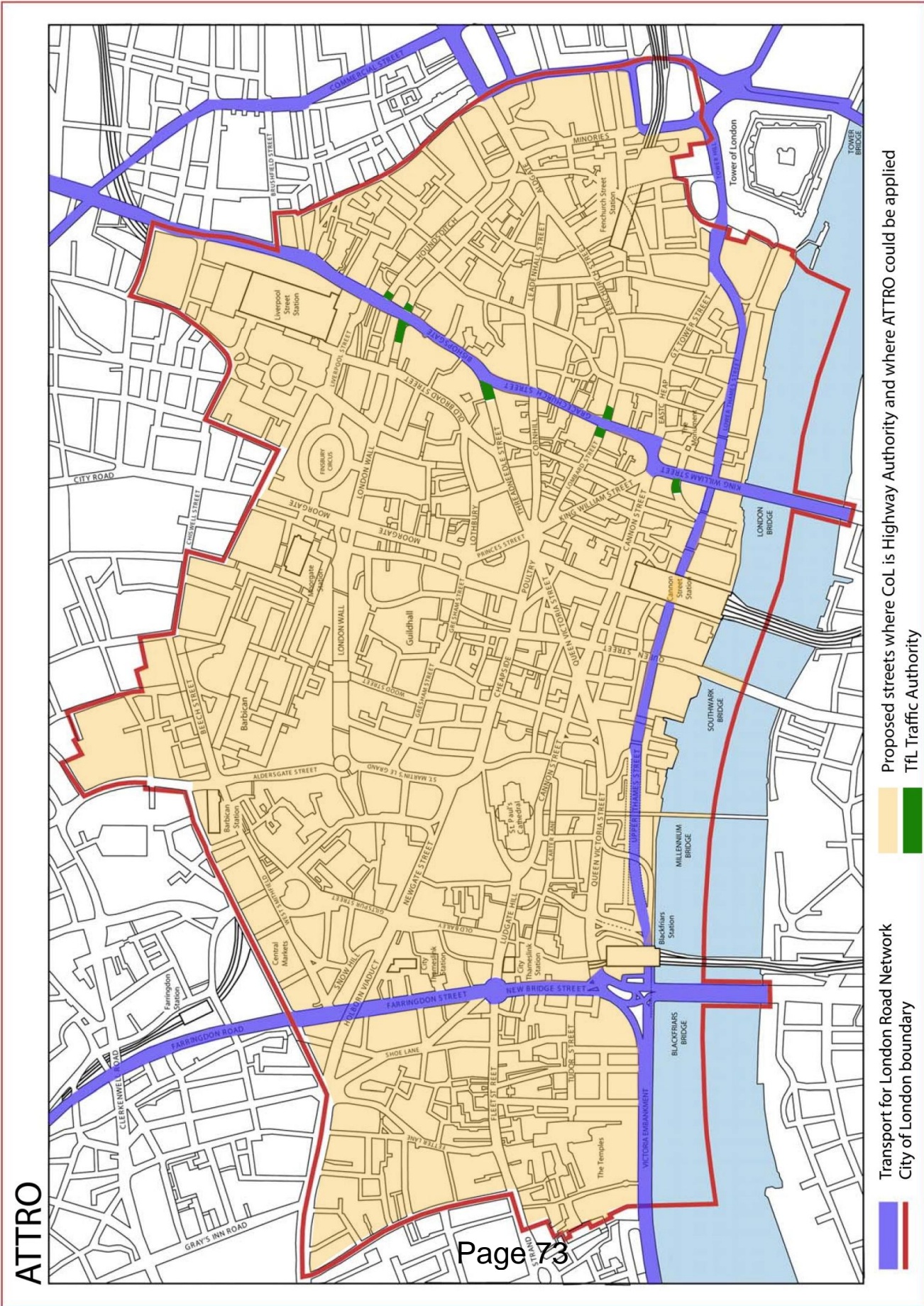
- (1) Access will only be restricted to the minimum number of roads necessary to remove or reduce the danger;
- (2) Access will be restricted only to the minimum number and types of road users necessary to remove or reduce the danger;
- (3) Access will only be restricted for the minimum period necessary to remove or reduce the danger; and
- (4) In no circumstances will access be restricted for a continuous period longer than 48 hours without the prior approval of the Commissioner of Police and the Town Clerk.

EXPLANATORY NOTE

(This Note is not part of the Order, but is intended to indicate its general purport).

This Order introduces measures for the control of the movement of vehicular traffic and pedestrians on the streets in the City of London if there is a there is sound reason to do so on the basis of a security assessment or intelligence of a likelihood of danger or risk of damage connected to terrorism.

Appendix 3: ATTRO map shows where the ATTRO could be applied in the City of London area including TfL Network Roads, with the exclusion of the boundary roads with neighbouring boroughs



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