



## Police Authority Board

**Date:** THURSDAY, 11 JULY 2019  
**Time:** 11.00 am  
**Venue:** COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

**Members:** Douglas Barrow (Chairman)  
Deputy James Thomson (Deputy Chairman)  
Nicholas Bensted-Smith  
Deputy Keith Bottomley  
Tijs Broeke  
Simon Duckworth  
Alderman Emma Edhem  
Alderman Alison Gowman  
Christopher Hayward  
Alderman Ian Luder  
Andrew Lentin (External Member)  
Deborah Oliver (External Member)  
Deputy Henry Pollard

**Enquiries:** Alistair MacLellan  
[alistair.maclellan@cityoflondon.gov.uk](mailto:alistair.maclellan@cityoflondon.gov.uk)

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

Dates of future meetings (all at 11.00am)  
19 September 2019  
24 October 2019  
28 November 2019

**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**

To agree the public minutes and non-public summary of the meeting held on 16 May 2019.

**For Decision**

(Pages 1 - 10)

4. **OUTSTANDING REFERENCES**

Joint Report of the Town Clerk and Commissioner.

**For Information**

(Pages 11 - 18)

5. **DRAFT MINUTES - PERFORMANCE AND RESOURCE MANAGEMENT COMMITTEE**

To receive the draft minutes of the Performance and Resource Management Committee meeting held on 21 June 2019.

**For Information**

(Pages 19 - 26)

6. **DRAFT MINUTES - POLICE PENSIONS BOARD**

To receive the draft minutes of the Police Pensions Board meeting held on 12 June 2019 and the recommendation regarding the appointment of a Deputy Chairman contained therein at Item 3.

**For Decision**

(Pages 27 - 30)

7. **DRAFT MINUTES - PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE**

To receive the draft public minutes and non-public summary of the Professional Standards and Integrity Committee meeting held on 3 June 2019.

**For Information**

(Pages 31 - 36)

### **City of London Police Force Items**

8. **HER MAJESTY'S INSPECTOR OF CONSTABULARY**

Her Majesty's Inspector of Constabulary to be heard.

**For Information**

9. **HMICFRS INTEGRATED PEEL INSPECTION - ACTION PLAN**  
Report of the Commissioner.  
  
**For Information**  
(Pages 37 - 52)
  10. **CITY OF LONDON POLICE COMMUNICATIONS STRATEGY**  
Report of the Commissioner *TO FOLLOW*.  
  
**For Information**
  11. **ANNUAL REPORT ON PROFESSIONAL STANDARDS ACTIVITY - 2018/19**  
Report of the Commissioner.  
  
**For Information**  
(Pages 53 - 70)
  12. **COMMUNITY SCRUTINY GROUP AND INDEPENDENT ADVISORY GROUP ARRANGEMENTS**  
Report of the Commissioner.  
  
**For Information**  
(Pages 71 - 80)
  13. **QUARTERLY COMMUNITY ENGAGEMENT UPDATE**  
Report of the Commissioner.  
  
**For Information**  
(Pages 81 - 92)
  14. **QUARTERLY EQUALITY AND INCLUSION UPDATE**  
Report of the Commissioner.  
  
**For Information**  
(Pages 93 - 98)
- City of London Police Authority Items**
15. **SPECIAL INTEREST AREA SCHEME 2019/20**  
Report of the Town Clerk.  
  
**For Decision**  
(Pages 99 - 134)
  16. **THE OFFENSIVE WEAPONS ACT 2019**  
Report of the Remembrancer.  
  
**For Information**  
(Pages 135 - 138)

## **City of London Police Finance**

17. **THE CITY OF LONDON POLICE PENSIONS BOARD - REVIEW OF ACTIVITIES FOR THE PERIOD 1 APRIL 2018 TO 31 MARCH 2019**  
Report of the Chamberlain.

*This report was scrutinised by the Police Pensions Board at its meeting on 12 June 2019.*

**For Information**  
(Pages 139 - 144)

18. **REVENUE AND CAPITAL BUDGET OUTTURN REPORT 2018/19**  
Report of the Commissioner.

*This report was scrutinised by the Performance and Resource Management Committee at its meeting on 21 June 2019.*

**For Information**  
(Pages 145 - 158)

19. **BUDGET MONITORING MONTH 2 - 2019/20**  
Report of the Commissioner.

*This report was scrutinised by the Performance and Resource Management Committee at its meeting on 21 June 2019.*

**For Information**  
(Pages 159 - 170)

20. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

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

22. **EXCLUSION OF THE PUBLIC**

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

**For Decision**

### **Part 2 - Non-Public Agenda**

23. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 16 May 2019.

**For Decision**  
(Pages 171 - 176)

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

**For Information**  
(Pages 177 - 178)

25. **DRAFT NON-PUBLIC MINUTES - PERFORMANCE AND RESOURCE MANAGEMENT COMMITTEE**  
To receive the draft non-public minutes of the Performance and Resource Management Committee meeting held on 21 June 2019.

**For Information**  
(Pages 179 - 182)

26. **DRAFT NON-PUBLIC MINUTES - PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE**  
To receive the draft non-public minutes of the Professional Standards and Integrity Committee meeting held on 3 June 2019.

**For Information**  
(Pages 183 - 186)

**City of London Police Finance**

27. **MEDIUM TERM FINANCIAL PLAN UPDATE**  
The Commissioner and the Treasurer to be heard.

**For Information**

28. **COMMISSIONER'S UPDATES**  
The Commissioner to be heard.

**For Information**

**City of London Police Force Items**

29. **GATEWAY 6 ISSUE - ACTION AND KNOW FRAUD CENTRE**  
Report of the Commissioner.

**For Decision**  
(Pages 187 - 214)

30. **ETHICAL PARTNERSHIPS FUNDING STRATEGY UPDATE**  
Report of the Commissioner.

**For Information**  
(Pages 215 - 222)

31. **TRANSFORM PROGRAMME: TARGET OPERATING MODEL UPDATE**  
The Commissioner to be heard.

**For Information**

32. **TRANSFORM PROGRAMME: UPDATED ESTIMATE OF CASH RELEASING BENEFITS (CRBS) AND ENHANCED INCOME GENERATION**  
Report of the Commissioner.

*This report was scrutinised by the Performance and Resource Management Committee at its meeting on 21 June 2019.*

**For Information**  
(Pages 223 - 238)

33. **NATIONAL ENABLING PROGRAMME - DESIGN REFRESH**  
Report of the Commissioner.

**For Decision**  
(Pages 239 - 248)

34. **MEMORANDUM OF AGREEMENT FOR THE POLICE NATIONAL ENABLING PROGRAMME BETWEEN CITY OF LONDON CORPORATION AND POLICE ICT COMPANY FOR 2019/20**  
Report of the Commissioner.

**For Decision**  
(Pages 249 - 256)

35. **CITY OF LONDON POLICE VEHICLE FLEET UPDATE REPORT**  
Report of the Commissioner.

**For Information**  
(Pages 257 - 264)

36. **CITY OF LONDON POLICE RISK REGISTER UPDATE**  
Report of the Commissioner.

**For Information**  
(Pages 265 - 278)

#### **Police Accommodation Strategy**

37. **POLICE ACCOMMODATION STRATEGY: CITY OF LONDON POLICE GENERAL UPDATE REPORT**  
Report of the Commissioner.

**For Decision**  
(Pages 279 - 286)

38. **GATEWAY 6 ISSUE - POLICE ACCOMMODATION STRATEGY: DECANT - RELOCATION OF FORCE CONTROL ROOM**  
Report of the Commissioner.

**For Decision**  
(Pages 287 - 292)

39. **GATEWAY 6 ISSUE - POLICE ACCOMMODATION STRATEGY: DECANT - FORENSIC SERVICES INTERIM LOCATION (RELOCATION OF FINGERPRINT LABORATORY)**

Report of the Commissioner.

**For Decision**  
(Pages 293 - 296)

40. **WOOD STREET AND SNOW HILL POLICE STATIONS - DELEGATED AUTHORITY TO APPROVE RECOMMENDED DISPOSAL OFFERS RECEIVED**

Report of the City Surveyor.

**For Decision**  
(Pages 297 - 298)

**City of London Police Authority Items**

41. **CITY OF LONDON POLICE IT MODERNISATION PROGRAMME**

Joint Report of the Chamberlain and Commissioner.

**For Decision**  
(Pages 299 - 344)

42. **REPORT ON ACTION TAKEN BETWEEN MEETINGS**

Report of the Town Clerk.

**For Information**  
(Pages 345 - 346)

43. **SUMMARY OF CITY OF LONDON POLICE BUSINESS AT CITY OF LONDON CORPORATION COMMITTEES**

Report of the Town Clerk.

**For Information**  
(Pages 347 - 358)

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

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

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## **POLICE AUTHORITY BOARD** **Thursday, 16 May 2019**

Minutes of the meeting of the Police Authority Board held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Thursday, 16 May 2019 at 11.00 am

### **Present**

#### **Members:**

Douglas Barrow  
Deputy James Thomson  
Nicholas Bensted-Smith  
Tijs Broeke  
Simon Duckworth  
Alderman Emma Edhem  
Alderman Alison Gowman  
Christopher Hayward  
Alderman Ian Luder  
Andrew Lentin (External Member)  
Deborah Oliver (External Member)  
Deputy Henry Pollard

#### **In Attendance:**

Deputy Tom Hoffman – Chief Commoner

#### **City of London Police Authority:**

John Barradell	- Town Clerk & Chief Executive of City of London Police Authority
Simon Latham	- Deputy Chief Executive of City of London Police Authority
Alex Orme	- Head of City of London Police Authority Team
Oliver Bolton	- Deputy Head of City of London Police Authority Team
Craig Spencer	- Town Clerk's Department
Alistair MacLellan	- Town Clerk's Department
Peter Kane	- Chamberlain & Treasurer to City of London Police Authority
Alistair Cook	- Head of Police Authority Finance
Paul Chadha	- Comptroller & City Solicitor's Department

#### **City of London Police:**

Ian Dyson	- Commissioner
Alistair Sutherland	- Assistant Commissioner
Karen Baxter	- Commander (Economic Crime)
David Evans	- Temporary Commander (Operations)
Cecilie Booth	- Chief Operating and Chief Financial Officer
Martin O'Regan	- City of London Police
Hayley Williams	- City of London Police
Teresa La Thangue	- City of London Police

1. **APOLOGIES**

*Alderman Alison Gowman was in the Chair.*

Apologies were received from Deputy Keith Bottomley.

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

There were no declarations.

3. **ORDER OF THE COURT OF COMMON COUNCIL**

**RESOLVED**, that the Order of the Court of Common Council dated 25 April 2019 appointing the Police Authority Board for the ensuing year be received.

4. **ELECTION OF CHAIRMAN**

An election of Chairman was conducted in line with Standing Order 29. Doug Barrow, being the only Member willing to serve, was elected Chairman for the ensuing year.

The Chairman thanked Members for their support and welcomed the Chief Commoner to the meeting.

5. **ELECTION OF DEPUTY CHAIRMAN**

An election of Deputy Chairman was conducted in line with Standing Order 30. Deputy James Thomson, being the only Member willing to serve, was elected Deputy Chairman for the ensuing year.

The Deputy Chairman thanked Members for their support.

6. **MINUTES**

**RESOLVED**, that the public minutes and non-public summary of the meeting held on 4 April 2019 be approved as a correct record.

7. **OUTSTANDING REFERENCES**

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

**6/2019/P – Report on IAG/CSG**

- The Chairman noted that adverts for both the IAG/CSG should be appropriately worded to ensure they were as inclusive as possible.

**9/2019/P – Budget Monitoring Template Refresh**

- In response to a comment from a Member, the Commissioner agreed to provide a budget monitoring report for Q1 to the July 2019 meeting, with the fully refreshed budget monitoring template being reported to the September 2019 meeting.

**RESOLVED**, that the report be received.

8. **MINUTES - ECONOMIC CRIME BOARD**

**RESOLVED**, that the draft public minutes and non-public summary of the Economic Crime Board meeting held on 5 April 2019 be received.

9. **APPOINTMENT OF COMMITTEES 2019/20, APPOINTMENTS TO OTHER BODIES, TERM LIMITS AND CITY OF LONDON POLICE AUTHORITY MAPPING EXERCISE**

Members considered a report of the Town Clerk regarding the appointment of Committees 2019/20, appointments to other bodies, term limits and City of London Police Authority mapping exercise and the following points were made.

**Appointment of Co-Opted Members to Committees of the Board**

- In response to a comment, the Town Clerk agreed to ensure that when vacancies were advertised, they took into account any protected characteristics of the wider composition of the Committee in question.

**Term Limits for Police Authority Board Members**

- The Chairman noted that other Grand Committees of the City of London Corporation had introduced term limits.
- The Town Clerk noted that other Police Authorities, namely the MOD Police and British Transport Police, were considering the introduction of term limits of up to ten years.
- A Member expressed concern that term limits would limit the effectiveness of experienced Members e.g. past Chairmen acting in a non-executive director fashion. For example, assuming a Member served as Deputy Chairman for four years, Chairman for four years, and exercised their right to act as Deputy Chairman for a further year, this would leave little scope for them to continue serving on and contributing to the work of the Board.
- Members felt that the introduction of term limits should not be retrospective.
- Given the issues raised by Members, the Town Clerk agreed to bring a further options paper on term limits back to the Board at a future meeting (17/2019/P).

**City of London Police Authority Bodies with remit over Police Authority Matters**

- Members were supportive of the proposal that a summary report of the Town Clerk be submitted to each meeting of the Board detailing Police Authority business considered at other City of London Corporation Committees and Sub-Committees.

**RESOLVED**, that Members,

### **Frequency of Meetings**

- Agree that the current schedule of meetings of the Police Authority Board per year was adequate.

### **Economic Crime Committee**

- Appoint Simon Duckworth, Deputy Keith Bottomley, Alderman Emma Edhem, Andrew Lentin and Nick Bensted-Smith to the Economic Crime Committee.
- Agree that the co-option of external Members be delegated to the Economic Crime Committee and its terms of reference amended accordingly.
- Appoint Nick Bensted-Smith Chairman of the Economic Crime Committee for 2019/20.
- Approve the Committee's terms of reference and composition subject to comments made.

### **Performance and Resource Management Committee**

- Appoint Tijs Broeke, Nick Bensted-Smith, Andrew Lentin, Deputy Keith Bottomley, Deputy James Thomson (in addition to his ex-officio appointment) and Deborah Oliver to the Performance and Resource Management Committee, amending its composition accordingly.
- Note the appointment by the Authority's Audit and Risk Management Committee of Kenneth Ludlam and Caroline Mawhood to the Performance and Resource Management Committee
- Agree that the co-option of one Member to the Committee be delegated to the Performance and Resource Management Committee and its terms of reference amended accordingly.
- Appoint Deputy James Thomson Chairman of Performance and Risk Management Committee for 2019/20.
- Approve the Committee's terms of reference and composition subject to comments made.

### **Professional Standards and Integrity Committee**

- Appoint Tijs Broeke, Nick Bensted-Smith, Alderman Alison Gowman, Alderman Emma Edhem and Deborah Oliver to the Professional Standards and Integrity Committee.

- Agree that the co-option of two Common Councilmen and one external Member be delegated to that Committee and its terms of reference amended accordingly.
- Appoint Alderman Alison Gowman as Chairman of Professional Standards and Integrity Committee for 2019/20.
- Approve the Committee's terms of reference and composition subject to comments made.

### **Police Pensions Board**

- Appoint Alderman Ian Luder as Chairman of the Police Pensions Board for 2019/20 and note its terms of reference and composition.

### **Police Accommodation Working Party**

- Agree the terms of reference and composition of the Police Accommodation Working Party.

### **Medium-Term Financial Plan Working Party**

- Appoint Tijs Broeke, Nick Bensted-Smith and Andrew Lentin to the Medium-Term Financial Plan Working Party.
- Amend its terms of reference to reflect its ongoing role of providing scrutiny of the Force's response to the Medium-Term Financial Plan.

### **Appointments to Other Bodies**

- Appoint Alderman Alison Gowman to the Streets and Walkways Sub (Planning and Transportation) Committee
- Appoint Deputy Keith Bottomley to the Digital Services Sub (Finance) Committee
- Appoint Tijs Broeke to the Homelessness and Rough Sleeping Sub (Community and Children's Services) Committee with one vacancy carried over **(17A/2019/P)**.
- Appoint Doug Barrow to the Safer City Partnership.
- Note the appointment of Doug Barrow and Deputy James Thomson to the Capital Buildings Committee.
- Note the appointment of Doug Barrow and Deputy James Thomson to the Crime and Disorder Scrutiny Committee.

- Appoint Simon Duckworth to the Association of Police and Crime Commissioners.

### **Term Limits for Police Authority Board Members**

- Request that the Town Clerk bring an options paper on term limits for Police Authority Board Members to a future meeting.

### **City of London Police Authority Bodies with remit over Police Authority Matters**

- Agree the proposal that a summary report the Town Clerk be submitted to each meeting of the Board detailing Police Authority business considered at other City of London Corporation Committees and Sub-Committees **(18/2019/P)**.

#### **10. DRAFT ANNUAL REPORT 2018-19**

Members considered a report of the Commissioner regarding the Annual Report 2018/19.

**RESOLVED**, that Members approve the Annual Report 2018/19 subject to any further comments being communicated to the Force by 23 May 2019 **(19/2019/P)**, and any substantive changes being approved by the Town Clerk under delegated authority in consultation with the Chairman and Deputy Chairman.

#### **11. HMICFRS INTEGRATED PEEL ASSESSMENT 2018-19**

Members considered a report of the Commissioner regarding the HMICFRS Integrated PEEL Assessment 2018/19 and the following points were made.

- The Assistant Commissioner noted that, in response to the conclusion of the inspector that a lack of external scrutiny was a major problem for the Force mainly owing to the City demographic, an action plan had been developed that had been shared with the Chairman and Deputy Chairman outside of the meeting.
- Members agreed that it would be a useful exercise to invite the Inspector of Constabulary to a future meeting to discuss the report and clarify any points within it **(20/2019/P)**.
- The Chairman noted that the Board would receive an update on the Force response to the AFIs at its July 2019 meeting **(20/2019/P)** and that the Action Plan would in the meantime be submitted to the Performance and Resource Management Committee with the Legitimacy aspects also being submitted to the Professional Standards and Integrity Committee for scrutiny **(21/2019/P)**.
- The Commissioner noted that the issues requiring improvement identified by the Inspector of Constabulary related to the use of police powers that had the potential to prove sensitive to certain communities

and/or groups. The Force was therefore expected to take feedback on the use of such powers from those groups to ensure their use was proportionate.

**RESOLVED**, that the report be received.

12. **INDEPENDENT CUSTODY VISITING SCHEME ANNUAL REPORT 2018/19**  
Members considered a report of the Town Clerk regarding the Independent Custody Visiting Scheme Annual Report 2018/19. In response to a comment from a Member, the Town Clerk agreed to review whether the time windows within which visits took place could be reviewed **(22/2019/P)**.

**RESOLVED**, that the report be received.

13. **LAUNCH OF NATIONAL AND LOCAL PROTOCOLS ON THE ROLE OF THE POLICE AND CRIME COMMISSIONERS IN THE CRIMINAL JUSTICE SYSTEM**  
Members considered a report of the Commissioner regarding the launch of National and Local Protocols on the role of Police and Crime Commissioners in the Criminal Justice System. In response to a comment, the Temporary Commander (Operations) agreed to liaise with a Member outside of the meeting to clarify the Authority's role with regards to the London Criminal Justice Board **(23/2019/P)**.

**RESOLVED**, that the report be received.

14. **CITY OF LONDON POLICE CORPORATE COMMUNICATIONS STRATEGY UPDATE**  
Members considered a report of the Commissioner regarding the City of London Police Corporate Communications Strategy. In response to a request from the Chief Executive of the Authority, the Commissioner agreed to liaise with the Director of Communications at the Authority on the drafting both the Internal and External Communications plans prior to bringing updated versions for information to the Board at its July 2019 meeting **(8/2018//P)**.

**RESOLVED**, that the report be received.

**1a. Internal Communications Strategy 2010-2024**

**RESOLVED**, that the Internal Communications Strategy 2010-2024 be received.

**2a. External Communications Strategy 2019-2024**

**RESOLVED**, that the External Communications Strategy 2019-2024 be received.

15. **DRAFT ALCOHOL STRATEGY 2019-23**  
Members considered a report of the Director of Community and Children's Services regarding the draft Alcohol Strategy 2019-23.

**RESOLVED**, that the draft Alcohol Strategy 2019-23 be received and the plan for consultation noted.

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

**Police Accommodation - Middlesex Street**

In response to a question from a Member, the Town Clerk agreed to review whether there was scope for the cost of charges for the Force at Middlesex Street could be borne by the Authority **(24/2019/P)**.

**Lifetime Offender Management Unit**

In response to a question, the Acting Commander (Operations) confirmed that the Lifetime Offender Management Unit pursued a twin-track approach of penalties for persistent wrongdoing, and rehabilitation.

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

**Member Visits**

The Chairman noted that he had undertaken a series of visits to the Force over the past month which had proved a good opportunity to see at first hand some of the operational issues facing the Force. The Chairman encouraged fellow Members to undertake Force visits. In response to a comment, it was noted that the invitation to the wider Court of Common Council for patrol visits is to be included in the Authority's quarterly police briefings on a rolling basis.

**British Police Symphony Orchestra**

The Chairman noted that he had been privileged to attend the Charity Gala Concert of the British Police Symphony Orchestra on 11 May 2019 and encouraged Members of the Board to attend future events.

18. **EXCLUSION OF THE PUBLIC**

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

19. **NON-PUBLIC MINUTES**

**RESOLVED**, that the non-public minutes of the meeting held on 4 April 2019 be approved as a correct record.

20. **NON-PUBLIC OUTSTANDING REFERENCES**

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

**RESOLVED**, that the report be received.

21. **NON-PUBLIC MINUTES - ECONOMIC CRIME BOARD**

**RESOLVED**, that the draft non-public minutes of the Economic Crime Board meeting held on 5 April 2019 be received.



22. **NON-PUBLIC MINUTES - POLICE ACCOMMODATION WORKING PARTY RESOLVED**, that the non-public minutes of the Police Accommodation Working Party meeting held on 4 April 2019 be received.
23. **COMMISSIONER'S UPDATES**  
The Commissioner was heard regarding updates on current issues and events regarding the Force.
24. **DELIVERY OF OPERATIONAL COMMITMENT WITHIN BUDGET 19/20**  
Members considered a report of the Commissioner regarding delivering on operational commitments 2019/20, and financial management and controls review for the City of London Police.
25. **BREXIT UPDATE**  
The Commander (Economic Crime) was heard regarding Brexit.
26. **VARIATION TO THE MEMORANDUM OF AGREEMENT FOR THE POLICE NATIONAL ENABLING PROGRAMME BETWEEN CITY OF LONDON CORPORATION AND POLICE ICT COMPANY**  
Members considered a report of the Commissioner regarding a variation to the Memorandum of Agreement for the Police National Enabling Programme between City of London Corporation and Police ICT Company.
27. **WAIVER REPORT FOR THE POLICE FLEET MAINTENANCE SUPPLY CHAIN**  
Members considered a report of the Commissioner regarding a waiver report for the Police Maintenance Supply Chain.
28. **21 NEW STREET AND 6-7 COCK HILL - OPTIONS FOR CONTINUED OCCUPATION BEYOND MARCH 2025**  
Members considered a report of the City Surveyor regarding 21 New Street and 6-7 Cock Hill – options for continued occupation beyond March 2025.
29. **GATEWAY 5 ISSUE - ACTION AND KNOW FRAUD CENTRE - PROGRAMME TEAM**  
Members considered an issue report of the Commissioner regarding the Action and Know Fraud Centre – Programme Team.
30. **GATEWAY 2 ISSUE - THE EMERGENCY SERVICES MOBILE COMMUNICATION PROGRAMME (ESMCP)**  
Members considered a Gateway 2 Issue report of the Commissioner regarding the Emergency Services Mobile Communication Programme.
31. **GATEWAY 3/4 ISSUE - DIGITAL INTERVIEW RECORDING SOLUTION**  
Members considered a Gateway 3/4 Issue report of the Commissioner regarding a Digital Interview Recording Solution.

**32. S22A AND S23 COLLABORATION AGREEMENT - FIRST CONTACT - PROVISION OF SERVICES**

Members considered a report of the Commissioner regarding s22A and s23 Collaboration Agreements – First Contact Provision of Services.

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

There were no non-public questions.

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

There were no items of non-public urgent business.

**The meeting ended at 1.08 pm**

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Chairman

**Contact Officer: Alistair MacLellan / [alistair.maclellan@cityoflondon.gov.uk](mailto:alistair.maclellan@cityoflondon.gov.uk)**

Reference Number	Meeting Date & Agenda Item	Reference	Responsible Officer	Status
3/2018/P	1 November 2018 Item 6 – Annual Review of Fees and Charges	Report to be submitted to Members setting out instances where fees and charges have not been imposed and the reasons for this.	Commissioner of Police	<b>DUE OCTOBER 2019</b>  <b>Update July 2019:</b> In discussion with the Police Authority Treasurer it has been agreed that this is part of a more strategic review of a Charging Model and as such it will be integrated into the strategic financial planning process.
8/2018/P	1 November 2018 Item 9 – Stop and Search Update	City of London Police Communication Strategy update to be submitted to April 2019 meeting.  To include review of how to improve communications with Members and the public regarding how the Force and partners respond to incidents of rough sleeping in the City in consultation with CoL Corporate Comms team (formerly 4/2019/P).	Town Clerk / Commissioner of Police	<b>COMPLETE – REPORT ON AGENDA (LIKELY ‘TO FOLLOW’)</b> <b>Update July 2019-</b> at the May 2019 Board meeting the Chief Executive indicated that he felt there was more work to do here and requested Force and Authority work together on the Strategy and submit an update report to the July 2019 PAB.
15/2018/P	Item 4 Outstanding References	Barbican CCTV will form part of Secure City Programme when CCTV is reviewed in the round.	Commissioner of Police	<b>DUE SIX MONTHS POST-CROSSRAIL OPENING.</b>

Reference Number	Meeting Date & Agenda Item	Reference	Responsible Officer	Status
3/2019/P	January 2019 Item 8 Quarterly Community Engagement Update	Review of Operation Luscombe to be submitted to Members.	Commissioner of Police	<b>COMPLETE</b> Details in quarterly Community Engagement report on agenda
6/2019/P	January 2019 Item 10 Quarterly Equality and Inclusion Update	Report on future of IAG and CSG to be submitted to Members.	Commissioner of Police	<b>COMPLETE</b> On agenda
7/2019/P	Item 11 ATTRO Review 2018	Report on whether ATTRO remains appropriate tool to be submitted to Members.	Director of the Built Environment	<b>DUE JANUARY 2020</b> <b>April 2019 Update:</b> Policy Committee (February 2019) agreed that ATTRO arrangements be subject to review every three years.
9/2019/P	February 2019 Item 7 Revenue Monitoring to December 2018	Finance Director to refresh budget monitoring template to include commentary on variances, and column between Revised and Actual Budget to enable Members to compare Year-to-Date budget.	Commissioner of Police	<b>COMPLETE</b> YTD (month 1 & 2) Budget Monitoring on agenda  (Full Q1 to be provided to September 2019 meeting)

Reference Number	Meeting Date & Agenda Item	Reference	Responsible Officer	Status
11/2019/P	February 2019 Item 8 Revenue and Capital Budgets 2019/20	Report on how Commissioner will deliver on operational commitments within proposed budgets for 2019-20 to be submitted to Members. Report to include commentary and context (e.g. breakdown of types of Police staff) for City of London Police Authority stakeholders e.g. Finance Committee. Vacancies to be included in Revenue budgets going forward.	Commissioner of Police	<b>COMPLETE</b> Establishment and staff breakdown now included in the YTD Budget report  <b>Update July 2019</b> This was addressed in a report to the May PAB, the only aspect outstanding was the Establishment and Staff Breakdown data which is in the YTD budget report on the agenda. An update on affordable workforce will be included at Q1 in September.
13/2019/P	February 2019 Item 13 Questions	Report on Partnerships Funding Strategy to be submitted to Members.	Commissioner of Police	<b>COMPLETE</b>

Reference Number	Meeting Date & Agenda Item	Reference	Responsible Officer	Status
14/2019/P	April 2019 Item 8 Quarterly Community Engagement Update	Statistics for begging and rough sleeping to be separated out and language of reporting to avoid term 'vagrant'/ vagrancy going forward.	Commissioner of Police	<b>IN PROGRESS</b> Will be addressed in next Quarterly update due October 2019  <b>Update July 2019-</b> There is no ASB data available for this issue- See report on agenda for details. Statistics will be available again for the October update.
16/2019/P	April 2019 Item 8 Quarterly Community Engagement Update	Roads Policing statistics in the next Quarterly update to provide breakdown of mode involved in incidents.	Commissioner of Police	<b>COMPLETE</b> On agenda
17/2019/P	May 2019 Item 9 Appointment of Committees	Options paper to be submitted to Police Authority Board regarding maximum term limits for Police Authority Members	Town Clerk	<b>DUE JANUARY 2020</b> This will form part of the annual review of the Board's terms of reference.
17A/2019/P	May 2019 Item 9 Appointment of Committees	Vacancy on Homelessness and Rough Sleeping Sub (Community and Children's Services) Committee to be advertised at future meetings.	Town Clerk	<b>IN PROGRESS</b> This will be advertised at the July 2019 meeting and going forward until Members direct otherwise.

Reference Number	Meeting Date & Agenda Item	Reference	Responsible Officer	Status
18/2019/P	May 2019 Item 9 Appointment of Committees	Standing item to be included on Board agendas summarising Police business raised at other City of London Corporation Committees.	Town Clerk	<b>COMPLETE</b>
19/2019/P	May 2019 Item 10 Annual Report 2018/19	Members to provide comments on Annual Report 2018/19 to Force Director of Communications by close of play 24 May 2019 and finalised Annual Report to be approved by Town Clerk under delegated authority.	Director of Communications (Force) and Town Clerk	<b>COMPLETE</b>
20/2019/P	May 2019 Item 11 HMICFRS PEEL Report	1) HMICFRS Inspector to be invited to July 2019 Police Authority Board meeting / 2) Force PEEL response to be agenda item at July 2019 meeting	Town Clerk  Commissioner of Police	1) <b>COMPLETE</b> -HMIC Matt Parr attending 2) <b>COMPLETE</b> - On agenda

Reference Number	Meeting Date & Agenda Item	Reference	Responsible Officer	Status
21/2019/P	May 2019 Item 11 HMICFRS Report	HMICFRS Report and detailed Action Plan to be submitted to Performance and Resource Management Committee; the report and the aspects of the PEEL Action Plan that relate to 'Legitimacy' be submitted to the Professional Standards and Integrity Committee	Commissioner of Police / Town Clerk	<b>COMPLETE</b>  <b>Update July 2019-</b> The HMICFRS update goes to the P&RM Committee as a standing item and did so on the 21 <sup>st</sup> June and the Legitimacy aspects were also submitted for the scrutiny of the PS&I Committee on 3 <sup>rd</sup> June 2019.
22/2019/P	May 2019 Item 12 ICV Visits Annual Report 2018/19	Consideration to be given to amending ICV time windows	ICV Scheme Manager	<b>COMPLETE</b> The new times suggested by Alderman Luder at the May meeting will be adopted and will be reflected in the next annual report. The new times to be analysed will be: 6pm-2am, 2am-10am, 10am-6pm.
23/2019/P	May 2019 Item 13 Protocols PCCs etc.	T/Cdr (Operations) to liaise with Alderman Gowman regarding City of London Police Authority representation on London Criminal Justice Board	Commissioner of Police	<b>COMPLETE</b> <b>Update July 2019-</b> T/Cdr Evans Staff officer confirms this has been addressed with Alderman Gowman



Reference Number	Meeting Date & Agenda Item	Reference	Responsible Officer	Status
24/2019/P	May 2019 Item 16 Public Question	Force/Authority to liaise with City of London Corporation regarding potential for Authority to meet cost on behalf of Force of charging to HRA for Middlesex Street Car Park	Treasurer	<p><b>UPDATE DUE AT SEPTEMBER 2019 MEETING</b></p> <p><b>Update July 2019-</b> Estates and Support Services Director reports that the position that has been adopted by Members at various meetings is that these costs should fall within the interim Accommodation Programme costs regarding decant.</p> <p>Treasurer to confirm how that decision has been progressed within other meetings with Members.</p>

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**PERFORMANCE AND RESOURCE MANAGEMENT COMMITTEE OF THE  
POLICE AUTHORITY BOARD  
Friday, 21 June 2019**

Minutes of the meeting of the Performance and Resource Management Committee  
of the Police Authority Board held at Committee Rooms, 2nd Floor, West Wing,  
Guildhall on Friday, 21 June 2019 at 10.30 am

**Present**

**Members:**

Deputy James Thomson (Chairman)  
Douglas Barrow (Ex-Officio Member)  
Nicholas Bensted-Smith  
Tijs Broeke  
Kenneth Ludlam (External Member)  
Caroline Mawhood (External Member)

**City of London Police Authority:**

Simon Latham	- Deputy Chief Executive
Oliver Bolton	- Deputy Head of Police Authority Team
Alistair MacLellan	- Town Clerk's Department
Tom Coniffe	- Town Clerk's Department
Caroline Al-Beyerty	- Deputy Treasurer
Alistair Cook	- Head of Police Authority Finance
Jeremy Mullins	- Chamberlain's Department – Internal Audit
Pat Stothard	- Chamberlain's Department – Internal Audit
Sean Green	- Chamberlain's Department – Information Technology
Kevin Mulcahy	- Chamberlain's Department – Information Technology

**City of London Police Force:**

Alistair Sutherland	- Assistant Commissioner
Oliver Shaw	- Detective Superintendent
Hector McKoy	- Chief Inspector I&I
Carl Tomlinson	- Financial Services Director
Stuart Phoenix	- Head of Strategic Development
Paul Adams	- Head of Governance & Risk
Julia Perera	- Human Resources Director
Hayley Williams	- City of London Police

**1. APOLOGIES**

Apologies were received from Deputy Keith Bottomley, Andrew Lentin and Deborah Oliver.

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

There were no declarations.

3. **TERMS OF REFERENCE**

Members considered the terms of reference of the Committee and the following points were made.

- In response to a comment from a Member, the wider Committee agreed that the terms of reference would benefit from some amendments to reflect the Committee's role in scrutinising the Force's response to HMICFRS inspections, and oversight of Force financial management controls. The Town Clerk noted that any amendments would be put to the Police Authority Board for approval.
- Members agreed that the co-opted vacancy on the Committee should be advertised to the wider Court of Common Council.

**RESOLVED**, that the terms of reference be received.

4. **MINUTES**

Members considered the public minutes and non-public summary of the meeting held on 26 April 2019. Members agreed that the section referencing 11/2019/P should be amended to reflect the fact that the Force had mapped its values against those held by the City of London Corporation, and that the reference be closed.

**RESOLVED**, that, subject to the comments made, the public minutes and non-public summary of the meeting held on 26 April 2019 be approved as a correct record.

5. **REFERENCES**

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

**15/2018/P – FOI Requests**

- The Chairman noted that the backlog of detailed responses had been cleared and therefore this reference could be closed.

**RESOLVED**, that the report be received.

6. **INTERNAL AUDIT UPDATE REPORT**

Members considered an update report of the Head of Audit and Risk Management regarding Internal Audit and the following points were made.

- The Chairman noted that the live Red rated recommendation regarding Key Financial Controls 2018/19 had been dealt with and queried what

progress had been made on the Red rated audit issues regarding Police Bank Accounts 2017/18.

- In reply, the Assistant Commissioner noted that local level Force meetings were held every Monday morning, with fortnightly meetings between the Commissioner and Chamberlain. A Strategic Finance Board had also been convened, which had not existed previously.
- In response to a comment that the Schedule of Internal Audit Projects 2018/19 gave Members little appreciation of what progress had been made to date, the Head of Internal Audit commented that this was partly due to internal audit fieldwork not commencing until Quarter 4 2018/19. The Head of Internal Audit noted that this would not prove an issue for 2019/20.
- In response to a question, the Head of Internal Audit replied that feedback would be provided to the Force over the next week, with a deadline for management responses of a fortnight.
- In response to concerns raised by a Member that there was no deadline – even provisional – for resolution of Key Financial Control issues, the Deputy Chamberlain noted that these would be resolved by November 2019.
- Members agreed that, in light of delays in implementing audit responses in the previous year, an interim update on progress being made should be provided to Members prior to the August 2019 recess.
- In response to a comment from a Member, the Head of Internal Audit noted that he had received assurances from the Force that the Amber recommendations regarding Police Seized Goods were being addressed and that he was due to discuss those recommendations in detail with Force representatives.

**RESOLVED**, that the report be received.

**7. REVENUE AND CAPITAL BUDGET OUTTURN REPORT 2018/19**

Members considered a report of the Commissioner regarding Revenue and Capital Budget Outturn 2018/19 and the following points were made.

- The Chairman welcomed the delivery of £3.1m of in-year savings and noted that he would welcome changes to future report formats to ensure a greater granularity of detail for Members.
- In response to a question from a Member regarding how sustainable a freeze on recruitment was, the Assistant Commissioner noted that the freeze on Force staff recruitment had been relaxed, and that the freeze was due in part to the Transform programme.

- In response to a question, the Assistant Commissioner noted that the Force was working through a new recharging model for the Economic Crime Directorate.
- In response to a question, the Assistant Commissioner confirmed that there were some discrepancies in the reported £1.2m overspend that were due to the drive to achieve strategic policing obligations.
- In response to a comment from a Member, the Chairman noted that a report regarding Ethical Partnerships was being prepared for submission to the Police Authority Board meeting on 11 July 2019.
- In response to a question, the Financial Services Director committed to providing a response regarding the write off of aged debt outside of the meeting.

**RESOLVED**, that the report be received.

**8. BUDGET MONITORING MONTH 2 - 2019/20**

Members considered a report of the Commissioner of Police regarding Budget Monitoring for Month 2 – 2019/20 and the following points were made.

- The Financial Services Director noted the additional £2m pressure on budgets due to pension contributions.
- A Member noted that 81 posts were being held vacant and noted his belief that a proactive plan was required to ensure policing services were adequately maintained.
- In response to a question, the Financial Services Director noted that the current budget was for the existing Force establishment i.e. it did not include the 67 additional posts recently requested by the Force, the funding for which was outside the current budget.
- The Assistant Commissioner clarified that the additional 67 posts would be funded from Proceeds of Crime Act (POCA) proceeds during Year 1, and an increase in the Business Rate Premium thereafter.
- The Treasurer noted that a revised budget should be prepared that included the additional 67 posts.
- In response to a question regarding longer term strategic funding for the City of London Police, the Chairman noted that this issue would be within the remit of the Resource Allocation Sub (Policy and Resources) Committee.
- The Deputy Treasurer commented that, with the adoption of the Fundamental Review by the Authority, in addition to Transform there were now two transformation programmes affecting the Force running

alongside one another. It would be necessary for the Force to make a judgement on what posts it was able to afford.

- The Deputy Chief Executive noted that the use of POCA proceeds was appropriate in light of the Fundamental Review but added that longer term funding would be subject to a decision to be made later in 2019.
- In response to a request from a Member, the Financial Services Director agreed to submit a revised budget to the Committee at its next meeting.
- The Chairman commented that figures within the report e.g. Directorate Breakdown would require commentary in future reporting.

**RESOLVED**, that the report be received.

**9. HMICFRS INSPECTION UPDATE**

Members considered an update report of the Commissioner regarding Her Majesty's Inspectorate of Constabulary, Fire & Rescue Services Inspection and the following points were made.

- The Assistant Commissioner noted that a further three inspections had been conducted since the last meeting of the Committee. 63 recommendations arising from the HMICFRS Inspection would be reviewed and ultimately closed.
- The Chairman welcomed the progress made on addressing legacy issues and queried the new Red status regarding *HMCPSP* and *HMICFRS National Report – Living in Fear (July 2017)* to which the Assistant Commissioner replied that this was a new, national, recommendation that would be reviewed by the Force.
- The Chairman of the Police Authority Board noted that he had met with the Force's HMICFRS Inspector who had noted he was content with the level of progress being made by the Force.

**RESOLVED**, that the report be received.

**10. PERFORMANCE AGAINST MEASURES END OF YEAR 2018-19 FOR THE POLICING PLAN 2018-20**

Members considered a report of the Commissioner regarding performance against measures end of year 2018/19 for the Policing Plan 2018-20 and the following points were made.

- The Assistant Commissioner noted that there was a rise in recorded crime with an extra 3.7 crimes committed per day. This reflected in part better recording techniques but also a real term increase in violent crime.
- The Assistant Commissioner added that at the time of going to print, data had not been available for Measure 10 (level of victim satisfaction

with the service provided by the City of London Police) due to GDPR but that this issue had now been resolved.

- In response to a comment from a Member, the Assistant Commissioner noted that the Force was among the top six forces rated for integrity of crime according to the National Crime Recording Standard.
- In response to a question, the Chairman noted that increase in crime associated with the Night Time Economy (NTE) could be addressed at least in part by the Night Time Levy (NTL). The Assistant Commissioner added that the NTL brought in £330,000 in the City of London, although it would be appropriate to review the formula used to allocate those monies in light of NTE crime and disorder becoming a larger issue.
- In response to a question, the Assistant Commissioner agreed to provide more detail on the use of the SOS Bus from Essex to Members outside of the meeting.
- A Member commented that a recorded positive outcome did not equate to a prosecution.

**RESOLVED**, that the report be received.

**11. HUMAN RESOURCES MONITORING INFORMATION 1ST OCTOBER 2018 - 31ST MARCH 2019**

Members considered a report of the Commissioner regarding Human Resources Monitoring Information for the period 1 October 2018 – 31 March 2019 and the following points were made.

- In response to a question, the Force Human Resources Director noted that the high number of leavers from the Force compared against national counterparts was largely due to a high number of retirements that reflected the Force's older age profile.
- In response to a question, the Force Human Resources Director confirmed that the exit interview process referenced within the report included a face-to-face session.

**RESOLVED**, that the report be received.

**12. BAME DRAFT ACTION PLAN 2019-2025**

Members considered a report of the Commissioner regarding the BAME Draft Action Plan 2019-2025 and the following points were made.

- The Assistant Commissioner acknowledged that there had been some delay in providing this report to Members given the reference requiring the report dated from November 2018. The Assistant Commissioner added that some Staff Network feedback was still required on the Action Plan.



- In response to a question, the Chief Inspector I&I noted that the main barrier facing implementation of the action plan was cost and confirmed that he was confident of buy-in to the plan from across the whole Force. He concluded by noting the National Black Police Association had been consulted during the drafting of the plan.

**RESOLVED**, that the report be received.

**13. COMMUNITY SURVEY RESULTS 2018/19**

Members considered a report of the Commissioner regarding Community Survey Results 2018/19 and the following points were made.

- A Member welcomed the evidence of increased community participation outlined within the report.

**RESOLVED**, that the report be received.

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

There were no questions.

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

There was no other business.

**16. 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 of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

**17. NON-PUBLIC MINUTES**

**RESOLVED**, that the non-public minutes of the meeting held on 6 February 2019 be approved as a correct record.

**18. NON-PUBLIC REFERENCES**

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

**19. TRANSFORM PROGRAMME: UPDATED ESTIMATE OF CASH RELEASING BENEFITS (CRBS) AND ENHANCED INCOME GENERATION**

Members considered a report of the Commissioner regarding the Transform Programme: Updated Estimate of Cash Releasing Benefits (CRBs) and Enhanced Income Generation.

**20. WORKFORCE PLAN 2018-2023- REFRESH**

Members considered a report of the Commissioner regarding the Workforce Plan 2018-2023 Refresh.

**21. NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no non-public questions.

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

There was one item of urgent business and one late paper.

**22.1 2020 IT Services Programme - Preparation of Tender**

Members considered a report of the Chamberlain regarding the 2020 IT Services Programme – Preparation of Tender.

**The meeting ended at 12.29 pm**

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Chairman

**Contact Officer: Alistair MacLellan / [alistair.maclellan@cityoflondon.gov.uk](mailto:alistair.maclellan@cityoflondon.gov.uk)**

## **POLICE PENSIONS BOARD**

**Wednesday, 12 June 2019**

**Minutes of the meeting of the Police Pensions Board held at the Committee Rooms, Guildhall, EC2 at 3.00 pm**

### **Present**

#### **Members:**

Alderman Ian Luder (Chairman)  
John Todd

Alexander Barr  
Tim Parsons

#### **City of London Police Authority:**

Alistair MacLellan	- Town Clerk's Department
Kate Limna	- Corporate Treasurer
Matt Mott	- Pensions Manager
Graham Newman	- Chamberlain's Department

#### **City of London Police Force:**

Carl Tomlinson	- City of London Police
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### **1. APOLOGIES**

There were no apologies.

The Chairman noted that Professor Philip Hodgson has resigned from the Board and placed on record his thanks for Professor Hodgson's service as Member Representative. The Chairman added that a recruitment process would be conducted to replace Professor Hodgson **(6/2019/P)**.

The Chairman thanked Members for their attendance at the meeting, given that it has been rescheduled from its original May 2019 date and assured Members that changes to future meeting dates would be avoided where possible.

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

There were no declarations.

### **3. TERMS OF REFERENCE**

Members received the Board's terms of reference and noted Alderman Ian Luder's appointment as Chairman of the Board. Members were unanimous that Cllr John Todd should be appointed Deputy Chairman for the ensuing year **(7/2019/P)**.

The Town Clerk noted that a report on the governance of the Board would be submitted to the October 2019 meeting **(8/2019/P)**.

**RESOLVED**, that Members

- Recommend the appointment by the Scheme Manager of Cllr John Todd as Deputy Chairman of the Police Pensions Board.
- Receive the terms of reference of the Board for 2019/20.

4. **MINUTES**

**RESOLVED**, that the public minutes and non-public summary of the meeting held on 25 January 2019 be approved as a correct record.

5. **OUTSTANDING REFERENCES**

**RESOLVED**, that the report of the Town Clerk regarding outstanding references be received.

6. **PRESENTATION**

The Pensions Manager was heard regarding training available for Members and the following points were made.

- 23 training modules had been passed by Members of the Board, out of a possible total of 42. In light of the resignation of Professor Hodgson, this number was now 35 out of a possible 42.
- Members of the Board should aim to complete all possible modules by April 2020 **(9/2019/P)**.
- Potential training offers for Members of the Board included scheme-specific training on items such as retirement grants and ill-health retirement, and general training on items such as HMRC limits, legal challenges and a scheme cost cap.
- The proposed training schedule for the Board for 2019/20 included retirement grants and taxation (October 2019) HMRC limits (January 2020) and TRP toolkit (April 2020). Legal challenge(s) and cost cap(s) would be agenda items at future meetings once fresh information became available.
- The Pensions Manager asked Members to provide him any training feedback outside of the meeting **(10/2019/P)**.
- In response to a question, the Pensions Manager confirmed that his team had not been in receipt of any complaints from scheme members that had required escalation to the Board.
- The Chairman requested, going forward, that a table be provided in the update report detailing the number of enquiries received from scheme members, and the number of enquiries dealt with within the best practice timeframe and the number of enquiries dealt with outwith the best practice timeframe **(11/2019/P)**.

- The Chairman noted that officers should be prepared to issue a communication to scheme members in the event of the legal challenge reaching a resolution **(12/2019/P)**.

**RESOLVED**, that the presentation be noted.

**7. THE CITY OF LONDON: POLICE PENSION SCHEME - UPDATE**

Members considered an update report of the Chamberlain regarding the City of London Police Pension Scheme.

- The Pensions Manager confirmed that the 31 August 2019 deadline for the issue of Annual Statements would be achieved.
- The Corporate Treasurer noted that officers would review the efficacy of converting the Risk Register into the new City of London Corporation risk register template, which would include a column on deadlines for achieve resolution of the relevant risk(s) **(13/2019/P)**.

**RESOLVED**, that the report be received.

**8. REVIEW REPORT FOR POLICE AUTHORITY BOARD**

Members considered a Review Report for the Police Authority Board.

**RESOLVED**, that the report be received.

**8.1 Appendix - The City of London Police Pension Board - Review of Activities for the period 1 April 2018 to 31 March 2019**

Members considered an appendix to the Review Report regarding the City of London Police Pension Board – Review of Activities for the period 1 April 2018 to 31 March 2019.

**RESOLVED**, that the report be received.

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

There were no questions.

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

There was no other business.

**11. EXCLUSION OF THE PUBLIC**

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

**12. NON-PUBLIC MINUTES**

**RESOLVED**, that the non-public minutes of the meeting held on 25 January 2019 be approved.

13. **NON-PUBLIC OUTSTANDING REFERENCES**  
**RESOLVED**, that the report of the Town Clerk regarding non-public outstanding references be received.
14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**  
There were no non-public questions.
15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT THAT THE BOARD AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**  
There was no other business.

**The meeting closed at 3.47 pm**

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Chairman

**Contact Officer: Alistair MacLellan / [alistair.maclellan@cityoflondon.gov.uk](mailto:alistair.maclellan@cityoflondon.gov.uk)**

**PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE OF THE POLICE  
AUTHORITY BOARD  
Monday, 3 June 2019**

Minutes of the meeting of the Professional Standards and Integrity Committee of the Police Authority Board held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Monday, 3 June 2019 at 11.00 am

**Present**

**Members:**

Alderman Alison Gowman (Chair)  
Tijs Broeke  
Alderman Emma Edhem  
Deborah Oliver  
Deputy James Thomson (Ex-Officio Member)

**City of London Police Authority:**

Simon Latham	- Deputy Chief Executive of Police Authority
Oliver Bolton	- Deputy Head of Police Authority Team
Alistair MacLellan	- Town Clerk's Department

**City of London Police Force:**

Alistair Sutherland	- Assistant Commissioner
Maria Woodall	- Detective Chief Superintendent
Glenn Maleary	- Chief Superintendent
Stuart Phoenix	- City of London Police

**1. APOLOGIES**

Apologies were received from Doug Barrow, Nick Bensted-Smith and Mia Campbell.

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

There were no declarations.

**3. TERMS OF REFERENCE**

**RESOLVED**, that the terms of reference of the Committee be received.

**4. APPOINTMENT OF CO-OPTED MEMBERS**

The Chair noted that no formal expressions of interest had been submitted to the Town Clerk ahead of 31 May 2019 deadline, but that she was aware of two Members of the Court of Common Council who wished to serve as co-opted Members, namely James Tumbridge, who had served on the Committee during 2018/19, and Caroline Addy.

Members agreed that, in light of his contribution to the work of the Committee during the past year, James Tumbridge should be co-opted for 2019/20 subject to confirmation of his willingness to serve.

Members discussed the co-option of Caroline Addy, noting her skills and experience as a junior Counsel with One Brick Court Chambers and Doughty Street Chambers. Members were mindful that, in light of the co-option of Mr Tumbridge, the co-option of Ms Addy would ensure an appropriate balance of diversity on the Committee particularly with regards to gender.

**RESOLVED**, that subject to their willingness to serve, James Tumbridge and Caroline Addy be co-opted on to the Professional Standards and Integrity Committee of the Police Authority Board for 2019/20 **(5/2019/P)**.

5. **MINUTES**

**RESOLVED**, that the public minutes and non-public summary of the meeting held on 15 March 2019 be approved as a correct record.

6. **OUTSTANDING REFERENCES**

Members considered a report of the Town Clerk regarding outstanding references from previous meetings and the following points were made.

**3/2018/P – Staff Survey**

- The Assistant Commissioner noted that the next Staff Survey would be conducted in January 2020 and that the Force was currently considering what organisation would be a suitable delivery partner. The Force was reviewing the format of the Authority's staff survey given this was deemed user-friendly and easy to interpret. The action plan had been circulated to Members.

**1/2019/P – Dashboard Format**

- The Commissioner agreed to circulate the revised dashboard to Members outside of the meeting.

**RESOLVED**, that the report be received.

7. **INTRODUCTION OF SPIT AND BITE GUARDS**

Members considered a report of the Commissioner regarding the introduction of Spit and Bite Guards and the following points were made.

- The Commissioner reported that a spit and bite guard had been applied on two occasions since April 2019. The circumstances of both applications had been fully reviewed to ensure officers had applied their training and that the guards had been appropriately applied.
- The Commissioner outlined the circumstances of one application of a spit and bite guard, on a shoplifting suspect on 10 May 2019. The application of the guard to the suspect had been the culmination of ten distinct stages to the overall situation, commencing with the officer inviting the suspect to calm down.



- The application of a guard was up to the individual officer concerned (i.e. an officer would never be ordered to apply a guard). Moreover, the guards were designed to be as transparent as possible to reduce the suspect's sensory deprivation. To date, no complaints had been received. All officers who were trained in the application of guards were issued with a single guard, and guards would not normally be reissued until the officer's original guard had been used i.e. an officer would not be able to stockpile a number of guards in their possession.
- In response to a question, the Commissioner replied that the use of spit and bite guards had not been reviewed by the Independent Advisory Group (IAG), but the Equalities and Inclusion Officer who advised the IAG had inspected the guards. The Commissioner noted that the Force was open to visits by either the IAG or Members of the Authority to observe training sessions.
- In response to a question, the Commissioner confirmed that the application of a guard would be recorded as a use of force.
- The Town Clerk agreed to liaise with the Force to enable Members of the Authority to attend use of force training **(6/2019/P)**.

**RESOLVED**, that the report be received.

**8. HMICFRS INTEGRATED PEEL ASSESSMENT 2018-19**

Members considered a report of the Commissioner regarding the HMICFRS Integrated PEEL Assessment 2018/19 and the following points were made.

- The Commissioner noted that no formal recommendations had been made by the Inspector, which was to be welcomed.
- In response to a comment, the Assistant Commissioner agreed to review whether it would be appropriate for the Force to issue a formal response to the recent City Matters article regarding the HMICFRS Integrated PEEL Assessment **(7/2019/P)**.
- In response to a comment, the Commissioner agreed to review the Force's communications plan to ensure there was reference to ensuring appropriate systems were in place to reassure the public **(8/2019/P)**.
- In response to a comment, the Commissioner agreed that the current lack of monitoring of use of force including the review of CCTV and body worn cameras fell within the remit of the Committee and would be the subject of a report at the September 2019 meeting **(9/2019/P)**.

**RESOLVED**, that the report be received.

**9. INTEGRITY DASHBOARD AND CODE OF ETHICS UPDATE**

Members considered a report of the Commissioner regarding the Integrity Dashboard and Code of Ethics Update and the following points were made.

- In response to a comment, the Commissioner noted that the development measures were classed as Amber to illustrate the fact that work on them was ongoing.
- In response to a comment, the Assistant Commissioner agreed that the language around training on standards, values and leadership should be amended to make clear the training was mandatory **(10/2019/P)**.

**RESOLVED**, that the report be received.

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

**Review of Cancelled Speeding Tickets**

In response to a question, the Commissioner agreed to circulate a briefing note to Members regarding the cancellation of speeding tickets within the City of London Police Force Area, following a recent report on the issue on the financial website *This is Money* on 8 May 2019 **(11/2019/P)**. The Assistant Commissioner noted that the Force had to date included emergency response vehicles using their lights in overall statistics for speeding, but that this practice would be discontinued going forward.

**Predictive Policing / Home Office National Data Analytics Solution**

In response to a question prompted by recent concerns raised by the West Midlands Police Ethics Committee on that Force's involvement in the Home Office National Data Analytics Solution, the Detective Chief Superintendent agreed to provide a reply to the Committee outside of the meeting **(12/2019/P)**. The Assistant Commissioner noted that the Force, at present, relied on the use of historic data rather than predictive solutions, and that appropriate consultation would take place before such an approach was adopted by the Force. Finally, the Assistant Commissioner confirmed that the Force had been involved in discussions around the potential for a Facial Recognition trial.

**11. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**

**New Director of Professional Standards**

The Assistant Commissioner noted that Detective Superintendent Angie Rogers had been appointed Director of Professional Standards in the room of Detective Chief Superintendent Maria Woodall and would take up the role from July 2019. The Chair requested a meeting with Supt. Rogers as soon as was convenient **(4/2019/P)**.

**12. 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 of business on the grounds they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Act.

**13. NON-PUBLIC MINUTES**

**RESOLVED**, that the non-public minutes of the meeting held on 15 March 2019 be approved as a correct record.

14. **NON-PUBLIC OUTSTANDING REFERENCES**  
Members considered a report of the Town Clerk regarding non-public outstanding references.
15. **11/2019/NP - FORCE RESPONSE TO HMICFRS COMPLAINTS AND MISCONDUCT FILE REVIEW**  
Members considered the Force Response to non-public outstanding reference 11/2019/NP HMICFRS Complaints and Misconduct File Review.
16. **IOPC POLICE COMPLAINTS INFORMATION BULLETIN - CITY OF LONDON - APRIL 2018 - MARCH 2019**  
Members considered the IOPC Police Complaints Information Bulletin – City of London – April 2018 – March 2019.
17. **EMPLOYMENT TRIBUNAL AND OTHER LEGAL CASES**  
Members considered a report of the Comptroller & City Solicitor regarding Employment Tribunal and Other Legal Cases.
18. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 4 – 1 JANUARY 2019 – 31 MARCH 2019**  
Members considered a report of the Commissioner regarding Professional Standards Statistics for Quarter 4 – 1 January 2019 – 31 March 2019.
19. **SUMMARY OF CASES**  
Members considered a summary of cases.
  - 19.1 **Misconduct - Gross Misconduct**  
Members considered reports regarding Misconduct – Gross Misconduct.
  - 19.2 **Case to Answer**  
Members considered reports regarding Case(s) to Answer.
  - 19.3 **No Case to Answer**  
Members considered reports where there was No Case to Answer.
  - 19.4 **Local Resolution**  
Members considered reports of cases that had been dealt with via Local Resolution.
20. **GLOSSARY**  
Members received a Glossary.
21. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**  
There were no non-public questions.

**22. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

There was no non-public other business.

**The meeting ended at 12.32 pm**

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Chair

**Contact Officer: Alistair MacLellan / [alistair.maclellan@cityoflondon.gov.uk](mailto:alistair.maclellan@cityoflondon.gov.uk)**

<b>Committee(s):</b> Police Authority Board-For information	<b>Date(s):</b> 11 <sup>th</sup> July 2019
<b>Subject:</b> HMICFRS Integrated PEEL Inspection- Action Plan	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 60-19	<b>For Information</b>
<b>Report author:</b> Stuart Phoenix, Head of Strategic Development	

## Summary

As requested by Members at your May 2019 Police Authority Board, this report provides Members with an update on the City of London Police response to HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) Integrated PEEL<sup>1</sup> Assessment for 2018/19.

The Force was graded:

Effectiveness	GOOD
Efficiency	GOOD
Legitimacy	REQUIRES IMPROVEMENT

All areas for improvement (AFI) have been accepted by the Force and an action plan has been developed (attached as Appendix 1) to address the AFIs identified within the report:

### AFI 1

The Force should improve its use of its crime-recording and management system to better manage its case files and investigative processes.

### AFI 2

The Force should implement a process to get feedback from vulnerable victims.

### AFI 3

The Force should implement the necessary processes to share information with schools in relation to children affected by domestic abuse incidents, to ensure information is shared as quickly and effectively as possible.

### AFI 4

The Force should improve its approach to the 'lifetime management' of organised criminals to minimise the risk they pose to local communities. This approach should include routine consideration of ancillary orders, the powers of other organisations and other tools to deter organised criminals from continuing to offend.

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<sup>1</sup> PEEL: Police Efficiency, Effectiveness and Legitimacy

AFI 5

The Force should strengthen its response to county lines, which are criminal networks involved in the distribution of drugs to different areas of the country that frequently exploit children and vulnerable people.

AFI 6

The Force needs to address the deficit it has identified in its medium-term financial plan.

AFI 7

The Force should ensure that effective external scrutiny takes place in relation to its use of force.

AFI 8

The Force should ensure that effective external scrutiny takes place in relation to its stop and search powers.

AFI 9

The Force should extend its unconscious bias training to all its workforce.

AFI 10

The Force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up-to-date and include current data.

AFI 11

The Force should ensure that its counter-corruption unit:

- has enough capability and capacity to counter corruption effectively and proactively;
- can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the force's data and identify computer misuse; and
- builds effective relationships with individuals and organisations that support and work with vulnerable people

The report's findings have been reported to your Police Performance and Resource Management Committee, who will perform their usual scrutiny function at their quarterly meetings to ensure progress is made to address the AFIs.

**Recommendation**

Members are asked to receive and note the contents of this report.

## Main Report

### Background

1. This report provides Members with an overview of the City of London Police response to HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) Integrated PEEL Assessment (IPA) for 2018/19.
2. Appendix 1 is the action plan developed in response to the HMICFRS report.

### Current Position

#### The Integrated PEEL inspection

3. In 2018/2019 HMICFRS adopted an integrated approach to their annual PEEL inspection, combining into a single inspection the effectiveness, efficiency and legitimacy areas of PEEL. Previously, these have been the subject of separate inspections.
4. HMICFRS list 10 areas against which forces are inspected. GOOD gradings from the previous inspection are carried forward by HMICFRS and not inspected in 2018/2019 except for 'Protecting vulnerable people' which is mandatory. Results are summarised below:

	Grade	Last inspected
<b>Effectiveness</b>	<b>GOOD</b>	
Preventing crime and tackling anti-social behaviour	GOOD	2017/2018
Investigating Crime	GOOD	2017/2018
Protecting vulnerable people	GOOD	2018/2019
Tackling serious and organised crime	GOOD	2018/2019
Firearms capability	This is not graded by HMICFRS	
<b>Efficiency</b>	<b>GOOD</b>	
Meeting current demands and using resources	GOOD	2017/2018
Planning for the future	REQUIRES IMPROVEMENT	2018/2019
<b>Legitimacy</b>	<b>REQUIRES IMPROVEMENT</b>	
Fair treatment of the public	REQUIRES IMPROVEMENT	2018/2019
Ethical and lawful workforce behaviour	REQUIRES IMPROVEMENT	2018/2019
Fair treatment of the workforce	GOOD	2017/2018

5. HMICFRS stated they are satisfied with most aspects of the Force's performance, but identified a number of improvements to provide a consistently good service, which are detailed below and form the basis of the action plan.

### **City of London Police Findings**

6. For the Effectiveness pillar of the IPA HMICFRS identified 5 areas for improvement:

#### Area for Improvement 1

The Force should improve its use of its crime-recording and management system to better manage its case files and investigative processes.

#### Area for Improvement 2

The Force should implement a process to get feedback from vulnerable victims.

#### Area for Improvement 3

The Force should implement the necessary processes to share information with schools in relation to children affected by domestic abuse incidents, to ensure information is shared as quickly and effectively as possible.

#### Area for Improvement 4

The Force should improve its approach to the 'lifetime management' of organised criminals to minimise the risk they pose to local communities. This approach should include routine consideration of ancillary orders, the powers of other organisations and other tools to deter organised criminals from continuing to offend.

#### Area for Improvement 5

The Force should strengthen its response to county lines, which are criminal networks involved in the distribution of drugs to different areas of the country that frequently exploit children and vulnerable people.

7. For the Efficiency pillar of the IPA HMICFRS identified 1 area for improvement:

#### Area for Improvement 6

The Force needs to address the deficit it has identified in its medium-term financial plan.

8. For the Legitimacy pillar of the IPA HMICFRS identified 5 areas for improvement:

#### Area for Improvement 7

The Force should ensure that effective external scrutiny takes place in relation to its use of force.

#### Area for Improvement 8

The Force should ensure that effective external scrutiny takes place in relation to its stop and search powers.

#### Area for Improvement 9

The Force should extend its unconscious bias training to all its workforce.



#### Area for Improvement 10

The Force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up-to-date and include current data.

#### Area for Improvement 11

The Force should ensure that its counter-corruption unit:

- has enough capability and capacity to counter corruption effectively and proactively;
- can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the Force's data and identify computer misuse; and
- builds effective relationships with individuals and organisations that support and work with vulnerable people

### **Governance and Oversight**

9. Progress against all HMICFRS recommendations and AFIs is monitored at the Force Performance Management Group. Updates include details of current positions against deadlines, together with an outline of what needs to be done before an action is deemed completed. Each action is given a Red, Amber or Green status.
10. Additional oversight is provided by your quarterly Performance and Resource Management Committee, which receives regular update reports in similar format and detail.

### **Conclusion**

11. The Force has appropriate mechanisms and plans in place to ensure recommendations and areas for improvement identified by HMICFRS are addressed.
12. Oversight and governance arrangements are sufficient to ensure progress is monitored and, where appropriate, challenged.

### **Contact:**

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## Integrated PEEL Assessment 2018/2019 Action Plan

Areas for Improvement		Status	Due Date	Tasks and current status	Lead Officers
Page 43 1	<p><u>Area for Improvement</u> The Force should improve its use of its crime-recording and management system to better manage its case files and investigative processes.</p>	AMBER	December 2019	<p><u>Tasks</u></p> <ul style="list-style-type: none"> <li>• Identify any training needs arising from audits.</li> <li>• Review the crime allocation process within the Force resolution centre.</li> <li>• Include issues identified from dip samples</li> <li>• Undertake a review of discontinued cases where the suspect has not been identified and the victim does not support the prosecution.</li> </ul> <p><u>Current status</u> Since the inspection a number of initiatives have commenced which contribute to identifying issues:</p> <ul style="list-style-type: none"> <li>• <i>Gatekeeper</i> – this position has been re-established to verify the completeness and quality of files before their submission to the Administration of Justice department for processing. Advice and feedback is provided to officers to enhance their knowledge/practises. The Gatekeepers is a member of the Disclosure Working Group enabling direct input regarding</li> </ul>	DCS Crime Directorate

Areas for Improvement		Status	Due Date	Tasks and current status	Lead Officers
				<p>related 'file quality' and Niche [crime and intelligence] system issues.</p> <p>The CPS submit to the Force details of cases 'failures' associated with volume crime, these are reviewed, trends and officers requiring additional input are identified and progressed; summary results are reported into the Disclosure Working Group.</p> <ul style="list-style-type: none"> <li><i>Weekly Offender Management Meeting</i> – Chaired by the DCI Crime this group manages performance levels of 'All outstanding suspects and warrants'. Issuing corrective actions to be taken and guidance to supervisors overall numbers of outstanding suspects is falling.</li> </ul>	
2	<p><u>Area for Improvement</u></p> <p>The Force should implement a process to get feedback from vulnerable victims.</p>	AMBER	December 2019.	<p><u>Tasks</u></p> <ul style="list-style-type: none"> <li>Review the current feedback process to establish if responses from victims can be improved.</li> <li>Benchmark with forces to establish their feedback processes for vulnerable victims.</li> <li>Identify the 'other vulnerable victims' to be contacted and incorporate into the existing feedback process.</li> </ul>	DCS Crime Directorate

Areas for Improvement		Status	Due Date	Tasks and current status	Lead Officers
3				<p><u>Current Status</u></p> <p>HMICFRS recognised in their report that the Force has a process to collect feedback from domestic abuse victims and victims with mental health concerns. However the identified gap is that feedback is not sought from other vulnerable victims.</p> <p>The feedback process is administrated by the Independent Domestic Abuse Advisor [IDVA], currently a part time vacancy exists which is being recruited to [at vetting stage]. Once the new IDVA has commenced, expansion of the feedback into other areas of vulnerability will begin.</p>	
	<p><u>Area for Improvement</u></p> <p>The Force should implement the necessary processes to share information with schools in relation to children affected by domestic abuse incidents, to ensure information is shared as quickly and effectively as possible.</p>	AMBER	December 2019.	<p><u>Tasks</u></p> <ul style="list-style-type: none"> <li>• City schools to sign-up to Op Encompass.</li> <li>• Dedicated Safeguarding leads within each school to be identified.</li> <li>• Schools to be trained to use the system [Op Encompass] by the Public Protection Unit.</li> </ul> <p><u>Current Status</u></p> <p>At the time of the inspection HMICFRS were aware of the Force's plans to implement Op Encompass; sharing information with schools in relation to children affected by domestic abuse incidents.</p>	DCS Crime Directorate

Areas for Improvement		Status	Due Date	Tasks and current status	Lead Officers
				<p>The Force, City schools and the MPS are adopting Op Encompass, an initiative already in place in other forces and recognised by HMICFRS.</p> <p>Leads in City Schools have been identified through prior contact by the Public Protection Unit [PPU]</p> <p>Training for the schools [by Public Protection Unit staff] and formal 'signup' by schools are the next steps with anticipated implementation the start of the next Academic year [September 2019].</p> <p>MPS plans for implementation are phased, initially starting with individual boroughs [child lives and attends school in the same area] and then progressing to cross boarder [child lives in one borough but attends school in another or the City].</p> <p>The speed of MPS implementation will impact the Force's ability to report to schools a child living in the City but attending school in the MPS area.</p>	
4	<p><u>Area for Improvement</u></p> <p>The Force should improve its approach to the 'lifetime management' of organised criminals to minimise the risk they pose to local communities. This approach should include routine consideration of ancillary orders, the powers of other organisations and other tools to deter organised criminals from continuing to offend.</p>	AMBER	December 2019	<p><u>Tasks</u></p> <ul style="list-style-type: none"> <li>• Lifetime Offender Management Team to be recruited and trained</li> <li>• Working practices to be established</li> <li>• Current ancillary orders to be reviewed</li> </ul>	DCS Intelligence and Information Directorate

Areas for Improvement		Status	Due Date	Tasks and current status	Lead Officers
				<ul style="list-style-type: none"> <li>• Individual action plans against subjects of orders to be developed and compliance reviewed.</li> <li>• Applications for new ancillary orders to be progressed.</li> <li>• Performance monitoring to be reviewed at the force Serious and Organised Crime Board.</li> </ul> <p><u>Current Status</u></p> <p>At the time of inspection the Force was recruiting to the Lifetime Offender Management Team, which subsequently went live in May 2018. There are currently 2 vacancies within the unit which have been advertised internally.</p> <p>Working practices are being established. Work to review ancillary orders has commenced, monitoring of subject compliance with ancillary orders has also begun.</p> <p>Opportunities for new ancillary orders are being examined.</p> <p>Progress made by the unit is reviewed by the Serious and Organised Crime Board.</p>	

Areas for Improvement		Status	Due Date	Tasks and current status	Lead Officers
5	<u>Area for Improvement</u> The Force should strengthen its response to county lines, which are criminal networks involved in the distribution of drugs to different areas of the country that frequently exploit children and vulnerable people.	AMBER	December 2019	<u>Tasks</u> <ul style="list-style-type: none"> <li>• Develop partnership engagements</li> <li>• Develop taskings and operations aligned to the risk reduction strategy.</li> <li>• Conduct a peer review</li> <li>• Monitor activities at the Force Serious and Organised Crime Board</li> </ul> <u>Current Status</u>  A peer review is to be conducted by the National County Lines Co-ordination Centre, date to be scheduled.	DCS Intelligence and Information Directorate
6	<u>Area for Improvement</u> The Force needs to address the deficit it has identified in its medium-term financial plan.	AMBER	December 2019	<u>Tasks</u> <ul style="list-style-type: none"> <li>• Produce and maintain a medium term financial plan</li> <li>• Identify options to address any deficits</li> </ul> <u>Evidence</u> Since that time of the inspection [December 2018] considerable efforts have been made by the Force and the City of London Corporation to establish a savings plan for 2018/2019 and secure additional funding. This has resulted in a balanced budget for 2019/2020.	Chief Operating and Chief Financial Officer



Areas for Improvement		Status	Due Date	Tasks and current status	Lead Officers
				Work continues; a revised medium term financial plan is scheduled for the Autumn Police Authority Board, this will identify any projected deficits which need addressing.	
7	<u>Area for Improvement</u> The Force should ensure that effective external scrutiny takes place in relation to its use of force.	AMBER	December 2019	<u>Tasks</u> <ul style="list-style-type: none"> <li>Engage with the community to attract new members</li> <li>Relaunch the external scrutiny group</li> </ul> <u>Current Status</u> <p>Although reflected as separate areas for improvement these both reflect the lack of an external scrutiny group at the time of inspection.</p> <p>Considerable efforts have been made to attract new members to this group and an Introductory day took place on the 11<sup>th</sup> June 2019. 6 potential new members attended and processing of formal applications, including vetting are in progress.</p> <p>Draft terms of reference for the group have been produced. The group will initially consider Stop and Search and Use of Force, but feedback will also be sought as to the groups' views regarding other Force practices.</p>	Ch.Supt. Uniform Policing Directorate
8	and <u>Area for Improvement</u> The Force should ensure that effective external scrutiny takes place in relation to its stop and search powers.	AMBER	December 2019		

Areas for Improvement		Status	Due Date	Tasks and current status	Lead Officers
				The first meeting of the group will be scheduled once applications have been processed and vetting clearance completed.	
	<u>Area for Improvement</u> The Force should extend its unconscious bias training to all its workforce.	AMBER	December 2019	<u>Tasks</u> <ul style="list-style-type: none"> <li>• Decide if this should be mandatory training for the whole workforce.</li> <li>• Review current training package to ensure it is fit for purpose of the remainder of the workforce who are not front line.</li> <li>• Timetable a rollout programme</li> <li>• Monitor training take-up</li> </ul> <u>Current Status</u> HMICFRS recognised that most but not all the workforce receive unconscious bias training.  The May 2019 Force Training Improvement Board has considered this issue and approved the delivery of unconscious training via an e-learning package. This will be mandatory training for the whole workforce.  This action will be complete once the workforce has been instructed and access to the training enabled; currently scheduled for August 2019.	Head of Learning and Development

Areas for Improvement		Status	Due Date	Tasks and current status	Lead Officers
	<p><u>Area for Improvement</u></p> <p>The Force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up-to-date and include current data.</p>	AMBER	December 2019 set to align with the next inspection anticipated early 2020.	<p><u>Tasks</u></p> <ul style="list-style-type: none"> <li>• Establish the format and considerations other forces are utilising for their assessments</li> <li>• Identify any data and intelligence gaps</li> <li>• Peer review by another force</li> </ul> <p><u>Current Status</u></p> <p>A template to support the construction of the anti-corruption strategic threat assessment has been agreed by the National Police Analysts working group. This template has been adopted by the Force.</p> <p>The Professional Standard Department has introduced a programme of drop-in sessions which helps to raise force awareness of issues including anti-corruption.</p> <p>The Professional Standards Department have also commenced a series of community engagement exercises, in conjunction with Community Policing. These sessions promote and make Professional Standards more accessible/visible and provides a forum to reinforce acceptable and non- acceptable standards of behaviours of officers and staff in additional to opening new avenues for the reporting of abuse or matters of concern.</p>	Head of Professional Standards

Areas for Improvement		Status	Due Date	Tasks and current status	Lead Officers
	<p><u>Area for Improvement</u></p> <p>The Force should ensure that its counter-corruption unit:</p> <ul style="list-style-type: none"> <li>• has enough capability and capacity to counter corruption effectively and proactively;</li> <li>• can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the force's data and identify computer misuse; and</li> <li>• builds effective relationships with individuals and organisations that support and work with vulnerable people</li> </ul>	AMBER	December 2019	<p><u>Tasks</u></p> <ul style="list-style-type: none"> <li>• Identify the resources required and submit a growth bid.</li> <li>• Identify any training required for new members of staff</li> <li>• Establish all issues associated interrogating force computer systems and seek to mitigate.</li> </ul> <p><u>Current Status</u></p> <p>HMICFRS has raised issues relating to staffing levels and monitoring of Force IT.</p> <p>A growth bid for an additional 2 people was considered by Resource Allocation Sub Committee [2<sup>nd</sup> May 2019] and agreed. These posts are yet to be filled.</p> <p>Software has been identified to enhance IT monitoring capability, a financing bid is being prepared.</p> <p>A draft Memorandum of Understanding with the BTP for collaborative working is currently being considered by the City of London Corporation's legal team; this would significantly improve resilience in this area.</p>	Head of Professional Standards

<b>Committee(s):</b> Police Authority Board- For information	<b>Date(s):</b> 11 <sup>th</sup> July 2019
<b>Subject:</b> Annual Report on Professional Standards Activity – 2018/19	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 61-19	<b>For Information</b>
<b>Report author:</b> DCS Maria Woodall / PC Ann Roberts	

## Summary

This report provides a comprehensive overview of activities relating to Police Professional Standards over the year 2018/19, giving an account of both the work of your Professional Standards and Integrity Sub-Committee and of the Force's Professional Standards Department (PSD) during this period.

Your Sub-Committee discharges an essential role of oversight and scrutiny of the Force's handling of complaint and conduct matters. It also provides invaluable support to the work of the Organisational Learning Forum (OLF) and the Force's Integrity Standards Board (ISB) incorporating the Police 'Code of Ethics'.

This report also provides a summary of performance statistics which are submitted annually to the Independent Office for Police Conduct (IOPC). Overall the recorded number of complaint cases has decreased in this period. This is partially attributable to a reduction in complaints relating to Action Fraud, the fraud reporting service hosted by the Force which has a national remit. Complaints relating to City of London Police personnel have seen a reduction against the previous year. Figures are low relative to the number of interactions with the public and to the complaint figures for other Forces.

The City of London Police's PSD performs well in terms of recording complaint cases within the target of 10 days (85%). The time the Force takes to complete local investigations which is lower than the national average (101 days compared to the national average of 158 days). The levels of upheld appeals (both Force and IOPC appeals) reflect the excellent investigation standards of the Professional Standards Department, with only one appeal (non- recording) being upheld in the reporting period.

PSD continues to improve the visibility of the department through improved internal communication and PSD training inputs across the Force.

The Organisational Learning Forum (OLF) monitors trends identified as potential concerns and identifies where action such as changes to operational procedures or specific training might drive service improvements. During 2018/19 examples of action taken following OLF include a number of changes to procedures, including but not exhaustively, use of body worn cameras and stop and search training.

*NB: For the benefit of Members, a glossary of technical terms has been included as an Appendix.*

## Recommendations

That the report is received and its contents noted.

## **Main Report**

### **The Professional Standards and Integrity Sub-Committee**

1. The Professional Standards and Integrity Sub-Committee has responsibility for providing detailed oversight of professional standards in the City of London Police. During 2018/19, it received statistical updates on complaint cases and trends relating to (a) the nature of allegations in complaints, and (b) the means by which those allegations are resolved. The Sub-Committee continues to perform a highly detailed scrutiny function to examine the casework of every complaint recorded by the Force – this is unique among all Offices of Policing and Crime Commissioners and local policing bodies.
2. The Sub-Committee has worked with the Director of the Professional Standards Department (PSD) to ensure that the papers reviewed by Members contain sufficient information to be able to assess whether an appropriate outcome was reached, while not unnecessarily revealing personal details of individuals involved or creating extra workload.
3. In 2018/19 the Sub-Committee continued to look at matters of conduct; it received updates on all misconduct meetings and hearings which had been dealt with by the Force. The Sub-Committee receives updates on Unsatisfactory Performance Procedures (UPP), which concern performance or attendance issues (as opposed to misconduct). It continues to receive updates on Employment Tribunal cases concerning police officers and police staff. These outlined the nature of claims and the outcome of cases. A report from the Integrity Standards Board (ISB) and integrity dashboard are also scrutinised. This includes the gifts & hospitality received by the Chief Officer team.
4. The Sub-Committee continues to support the Force in ensuring themes identified in complaint or conduct cases are progressed as issues of Organisational Learning. This is done through the PSD Working Group (PSDWG). The Force's Organisational Learning Forum (OLF), chaired by the Assistant Commissioner, includes representation from all Force Directorates and has a series of working groups focusing on specific areas of organisational learning, including PSD, Custody and Public Order. The Sub-Committee is represented by Oliver Bolton, from the Town Clerk's Department, who attended meetings of the PSDWG in 2018/19, and the Sub-Committee received a digest of highlighted areas/themes of learning at every meeting.

### **The Work on Police Integrity & Code of Ethics**

5. Integrity is now driven within CoLP by three distinct units. Strategic Development holds the Force lead for overseeing how integrity is embedded in the organisation, principally through initiatives delivering the objectives of the National Police Code of Ethics. PSD educates, monitors and investigates issues that impact on integrity while Organisational Development Department is responsible for ensuring that integrity informs and enhances workforce development.
6. During 2018/19 the Force has continued to deliver initiatives supporting workforce and organisational integrity. The Chairman of the Professional Standards and

Integrity Committee continues to support these activities as a critical friend, which has helped to drive the improvements forward. These include:

- i. A quarterly Integrity Standards Board (ISB) that is chaired by the Assistant Commissioner and attended by the Chairman of the Professional Standards and Integrity Committee together with a representative from the Police Authority. The Board considers information against a range of indicators that highlight where individual or organisational integrity might be called into question. The Board also receives regular updates on activities to promote and embed the Police Code of Ethics into business as usual.
- ii. An annual Integrity and Code of Ethics development plan, which is considered at your Professional Standards and Integrity Committee.
- iii. An internal group of Ethics Associates, who meet to consider ethical dilemmas and situations as part of the Regional London Police Challenge Forum, of which the City of London Police was a founding member. The Force shares hosting the meetings, alternating with the British Transport Police and Metropolitan Police Service. The Commander Operations and the Head of Strategic Development are both members of the Regional Police Ethics Network and the national UK Police Ethics Guidance Group.

## **HMICFRS<sup>1</sup> Legitimacy Inspection**

7. Part of HMICFRS's annual inspection programme examines forces' legitimacy. The inspection looks specifically at the extent to which forces:
  - i. Treat people with fairness and respect;
  - ii. Ensure their workforce act ethically and lawfully; and
  - iii. Ensure the workforce themselves have been treated with fairness and respect.
8. The latest report relating to the City of London Police was published in May 2019 and graded the Force as **REQUIRES IMPROVEMENT** overall for legitimacy. 7(i) and 7(ii) above were both assessed as requiring improvement, whilst 7(iii) was graded as **GOOD**.
9. HMICFRS notes the Force continues to uphold an ethical culture and promote standards of professional behaviour well, but there is more to do to assure itself that it has the capacity and capability to root out corruption. Also, the Force should make sure it has the necessary systems in place to reassure the public that it carries out stop and searches legitimately.

Despite the overall grading of 'Requires Improvement' HMICFRS did not find any underlying causes for concern and did not make any formal recommendations. Their report identified 5 'areas for improvement' (AFIs), all of which have been reported to your Police Performance and Resources Committee and Professional Standards and Integrity Committee.

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<sup>1</sup> Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services

## Independent Office for Police Conduct (IOPC)

10. The IOPC collects complaint data from all 43 Forces in England and Wales and produces a quarterly statistical bulletin. Each Force is provided an individual Bulletin containing complaint data, data compared to the “most similar force” (which the CoLP does not have given its unique size and remit) and national data. The IOPC also reports on its own performance. It produces an Annual Report on complaint statistics which allows Forces to see all national Force data together, and outlines any national trends on the reporting, investigation and appeals to the IOPC. The full annual report for all Forces for the previous year’s data 2018/19 is published later into this year period. The IOPC acknowledge the complaints generated from Action Fraud which is a national service.
11. CoLP PSD referred 10 cases to the IOPC during 2018-19<sup>2</sup>. During the same period the total number of method of investigation (MOI) decisions by the IOPC (including some cases referred during the previous year) were for 5 to be locally investigated by CoLP, 4 to be independently investigated by the IOPC and 0 to be supervised by the IOPC. 2 were returned to CoLP for the Force to deal with locally, not necessarily by means of an investigation. Currently the IOPC is conducting a total of 9 independent investigations. The volume of independent investigations reflects an increase in staff, span and scope of the IOPC involvement and the case referral criteria.
12. According to IOPC data, the City of London Police’s PSD performs well in terms of the time the Force takes to complete local investigations which is lower than the national average (101 days compared to the national average of 158 days). The levels of upheld appeals (both Force and IOPC appeals) reflect the excellent investigation standards of the Professional Standards Department, with only one appeal (non-recording) being upheld in the reporting period.

## Complaints

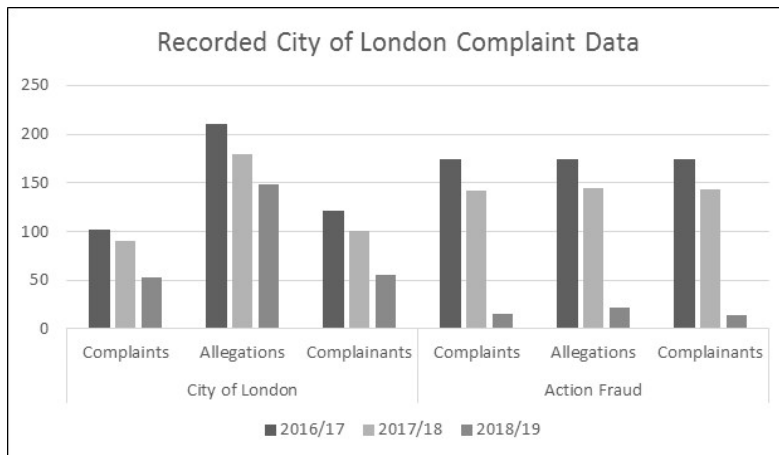
### Recorded Complaints

	City of London			Action Fraud		
	Complaints	Allegations	Complainants	Complaints	Allegations	Complainants
2016/17	102	210	121	174	174	174
2017/18	90	180	100	142	145	143
2018/19	53	148	56	15	22	14

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<sup>2</sup> Rolling year – some matters recorded during the previous quarter or year





13. The City of London Police is the national Lead Force within the UK for Economic Crime investigation and since April 2013, receives all reports of fraud reported across England and Wales through the 'Action Fraud' reporting process. Complaints regarding the delivery of the Action Fraud service are recorded under the Appropriate Authority of the City of London Police. The IOPC has acknowledged the complaints generated from Action Fraud as a national service, but the figures are included with the City of London data (due to falling within the remit of the City of London Police Appropriate Authority).
14. Generally, the expressions of dissatisfaction with Action Fraud are substantially increasing to the extent that they would overwhelm the police complaints system. Much of this is to do with the embedding of the new fraud reporting and assessments system, changes that were made to the Action Fraud enquiry/complainant process, and an overall increasing in fraud reporting under the new online system.
15. Action Fraud are dealing with these complaints themselves, initially under their Complaints Policy, which provides a means of service recovery/informal resolution. The few that get escalated through to PSD for consideration are either, where the complainant remains unhappy with the lack of update, or the decision has been made not to refer a fraud report for investigation. Action Fraud complaints that are recorded are usually those in the former category where the complainant is being particularly difficult and/or persistent, and where recording it under PRA provides a means to provide a final explanation and any resolution and to bring it to a close. Unfortunately, we are seeing an increase in complainants in this category and it is likely that in the next financial year there will be an increase in the number of Action Fraud reports that we will need to formally record under PRA.
16. Those complainants not happy about the decision not to investigate a reported fraud are not recorded under PRA but are given the right to appeal to the IOPC. The IOPC consider that using the complaints system to influence a force to record or investigate crime, is an abuse of the process. There have been a number of appeals against non-recording in this category, none of which have been upheld by the IOPC.
17. There were 15 allegations of "discriminatory behaviour" recorded during 2018/19; these sub categorise into 12 Race, 1 Religious, and 2 Other. Of this allegation type 16

were finalised<sup>3</sup> following a PSD investigation, with outcomes as follows: 10 allegations were 'not upheld', 4 were Locally Resolved. One allegation was withdrawn by the force. At the close of the period, five are ongoing live investigations.

#### Allegations Recorded

18. A total of 170 allegations were recorded in 2018/2019. In terms of nature of allegations, the *highest* categories were:

<b>Type:</b>	<b>Number allegations:</b>	<b>Overall percentage</b>
Other neglect or failure in duty	29	17%
Other Assault	19	11%
Other irregularity in procedure	17	10%
Incivility, impoliteness and intolerance	15	9%
Discriminatory behaviour	15	9%
General Policing Standards	12	7%
Operational management decisions	9	5%
Oppressive Conduct or Harassment	9	5%

19. 2018/19 City of London Police complaint data accounts for 78% of the total cases recorded. This is a variation from 2017/18 where Action Fraud cases formed the majority at 61%. This is due to the adjustment in recording standards of complaints relating to Action Fraud.

20. General Policing Standards and Operational management decisions and allegation types are almost all relating to Action Fraud.

21. The allegation type Neglect of Duty remains the highest allegation category recorded in this reporting period. This is the same as the previous three year's data, and reflects the national picture. Other Assault is higher this reporting period than previously and can be attributed to complaints surrounding Handcuffing and Police dog bites. Learning has been disseminated in these areas. The effective use of Body Worn Cameras have been instrumental in the investigation of such recorded complaints and the outcomes.

#### Finalised Allegations

22. In the last year a total of 159 allegations were finalised. 139 of which were investigated by PSD. A total of 8 (5%) were upheld. *Table shows highest Allegation categories.*

<b>Type:</b>	<b>Number allegations: Upheld</b>	<b>Number of Allegations: Locally Resolved</b>	<b>Total Allegations (Finalised by all means)</b>
Other neglect or failure in duty	2	9	23
Incivility, impoliteness and intolerance	1	12	20

<sup>3</sup> The finalised allegations are from a rolling period therefore may not be cases recorded in the same year.

Other Assault	1	1	17
Discriminatory behaviour	0	4	16
Other irregularity in procedure	0	2	15
General Policing standards	0	12	14

23. There has been a decrease in Local Resolution as a means to finalise allegations. During 2018/19 Including Action Fraud data, 36% allegations were finalised by means of Local Resolution. Figures for the previous year was 61%. National average data for end of Q4 2018/19 is reported as 48%. The adjustment in Action Fraud complaint recording have had a dramatic impact upon Local Resolution data as previously the service recovery was recorded as a complaint and virtually all were finalised in this manner. Local resolution figures have returned to the same levels prior to the Action Fraud data recording.

### **Complainant Characteristics**

#### *Ethnicity*

24. PSD does record data relating to the ethnicity of the complainant. However, meaningful data is difficult to collect as complainants are often reluctant to self-identify. 45 out of the 70 complainants (64%) did not state their ethnicity. The highest category recorded is White British, 13 complainants have self-defined their ethnicity within this group (19%). These are similar statistics to previous years.

#### *Gender and age*

25. A total of 70 complainants were recorded in 2018/19. Of these 52 stated they were male, 17 female and in 1 case gender is unknown. Most complainants do not state age, but from what the Force has recorded, the highest category is 40-49 years of age. This is the same age group as the previous year. Of the groups aged 20-49 a total of 29 complainants disclosed their age (41%). 31 complainants provided no data (44%).

### **Organisational Learning Forum and other internal groups**

26. Learning issues are central to the work of PSD. Complainants often express that they want the officer/organisation to acknowledge what went wrong, and understand how the Force will ensure that similar issues will not happen again. The Organisational Learning Forum (OLF) chaired by AC Sutherland, is well established, has been operating for several years and meets on a quarterly basis.
27. The work of the OLF cuts across the organisation, it is a decision making forum and if necessary issues are escalated to the Force's Strategic Management Board (SMB). The OLF has the responsibility for the strategic overview of learning across all Directorates. It is supported by tactical groups focusing on Custody, Public Order, Stop and Search and Professional Standards, to tackle learning on a local level.

28. The Professional Standards Department Working Group (PSDWG) is attended by Oliver Bolton from the Town Clerk's Department, representing the Sub-Committee. The Chairman of the Professional Standards and Integrity Sub-Committee attends the Integrity Standards Board for independent oversight. Any identified PSD learning issues that need to be addressed at a more strategic level are elevated to the OLF. The PSDWG also reviews the 'Learning the Lessons' bulletins issued regularly by the IOPC and ensures that lessons contained within them are addressed and disseminated across the Force.
29. During 2018-19, the PSDWG took the lead on a number of topics identified as areas for organisational learning, case study example:-

#### Body Worn Cameras and the correct use of Grounds for Stop/Search

A complaint was made following a Section 1 search (prohibited articles) process whereby the detaining Officer detained and handcuffed the suspect but did not execute a search. The arrest statement justified the handcuffing of the complainant (Sec 1 PACE search for prohibited articles). However, the rationale for the decision not to carry out the search was not. The complainant alleged that if the officer dealing with him had listened, the arrest would not have been necessary - further alleging that the officer was, unprofessional - in that he was intimidating, aggressive and refused to listen. Body worn video could have been utilised in a more effective manner i.e. switched to record on arrival at the incident and to remain on until the conclusion. The BWV in this matter was not switch on until a few minutes into the incident and then turned off before the conclusion. Learning identified:-

BWV to be turned on to record on arrival at incidents and off after concluded.  
Officer notes/statement to fully reflect the grounds for stop/search/arrest and/or course of action within the National Decision Model process.  
Officers to maintaining standards even when faced with frustrating situations.  
Officers to ensure that during searches GOWISELY (acronym for officers to recall the relevant powers/procedures) is used. With BWC footage/mobile phone footage being used imperative that Officers explain and justify their searches in accordance with the legislation.

Learning and development have amended their training packages to incorporate this learning.

#### **Criminal Investigations**

30. On Wednesday 18th April 2018 a Police Officer was found guilty at Guildford Magistrates Court for the offence of Assault by Beating contrary to Section 39 of the Criminal Justice Act 1988. The Officer appealed his conviction. The appeal hearing took place at Guildford Crown Court on 20 & 21 December 2018. His appeal was dismissed. The offence occurred whilst the PC was off duty at his home address in an ongoing dispute between neighbours next door to each other in June 2017. Surrey Police conducted an investigation culminating in a postal summons being issued in November 2017.

Following the failed appeal at Court, the case was Fast Tracked to a Misconduct Hearing. The Officer was found to have breached the Standards of Professional Behaviour of Discreditable Conduct and was dismissed without Notice.

31. On 13 June 2018 a Police Officer was arrested at his home address by Metropolitan Police officers on suspicion of common assault on his partner. He was interviewed and released under investigation. The Officer was served with a Regulation 15 Notice in relation to Discreditable Conduct. The Metropolitan Police investigated the allegation however found no evidence to suggest an assault had taken place, therefore closed the case with no action taken against the Officer. The matter was reassessed by the Appropriate Authority and the Regulation 15 Notice was withdrawn. There was therefore No Case to Answer.
32. A criminal investigation was conducted into an allegation of fraud by a member of CoLP staff. A criminal caution was administered. Following an HR Gross Misconduct investigation the member of staff was dismissed.

## **Misconduct**

33. Misconduct can be categorised as being either 'misconduct' or 'gross misconduct', the latter being the more serious. Where it is determined that an officer has a case to answer, misconduct matters are heard at a misconduct meeting and gross misconduct is dealt with by means of a hearing. During the reporting period 2018/19, 13 misconduct cases were recorded within PSD. A total of 12 misconduct cases were finalised during the reporting period (some of these cases had been carried over from previous years). Currently 8 misconduct cases remain live investigations. Of the misconduct cases finalised during the reporting period the outcomes<sup>4</sup> were as follows:-

- a) Misconduct Hearings

Three Misconduct Hearings have been held:

In the first hearing - the proceedings were stayed and the charges dismissed.

In the second hearing - the officer was dismissed without Notice.

In the third hearing (IOPC directed), the panel found against the officer and imposed a final written warning. The officer lodged an appeal and at the subsequent appeal tribunal, the appeal was upheld. The findings were quashed and the written warning cancelled.

- b) Misconduct Meetings

There have been no meetings held in the reporting period.

- c) Management Action

In three cases there was a Case to Answer and the officer(s) were given formal management action. In two cases there was No Case to Answer with no misconduct identified where the officers received management action.

- d) No Action

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<sup>4</sup> Some cases involve more than one officer & those involved may receive different disciplinary outcomes

In six cases there was No Case to Answer and no further action was taken against the officers.

e) Members of Police Staff

One member of police staff was subject of misconduct proceedings and dismissed.

### **Unsatisfactory Performance Procedures (UPP)**

34. During the reporting period there were no UPP matters recorded.

### **Staffing**

35. During 2018/19 Assistant Commissioner Alistair Sutherland, continues to oversee the work of the Professional Standards Department within Business Support Directorate. The current Director of Professional Standards is D/Chief Supt Maria Woodall. D/Supt Angie Rogers is due to take over this role in July 2019. In April 2019 DCI Claire Cresswell returned as Deputy Director after a long period of maternity leave and continues to complete the Designated Appropriate Authority role, making decisions for all complaint and conduct cases.

36. The Team have recently moved to new offices within the New Street building. The site has PSD dedicated accommodation suitable for holding misconduct meetings and hearings. This will provide a potential for future income generation through renting the space out to other forces to hold their own misconduct hearings. A business case and costings are currently being developed and several forces have come to tour the facilities.

37. CoLP PSD is continuing to look at new ways of increasing capabilities especially within proactive counter corruption. CoLP and British Transport Police CCU PSD are now co-located in New Street offices. In addition a Memorandum of Understanding has been drafted to allow the teams to begin to work collaboratively and to share resources. This is currently with the City of London legal team and it is expected that the collaboration could start by the end of summer 2019.

### **Future Governance and Regulatory Change**

38. The Chapman Review, public consultation and stakeholder led cross sector working has resulted in staged reforms to the Police Disciplinary and Complaints System. In 2015 Public Misconduct hearings were introduced to increase transparency alongside the introduction of legally qualified 'chairs'. Change has also resulted from the transition from the IPCC to the IOPC which have already resulted in more cases being closed, a reduction in average case lengths and a concerted effort to finalise some of the long-standing legacy cases the IOPC inherited.

39. The Policing and Crime Act 2017 established the basis for further longer-term systemic reform which, amongst other things, saw the introduction of a barred and advisory list to ensure former officers cannot avoid accountability for 'Gross misconduct' together with a further iteration of reforms attendant to the Independent Office for Police Conduct.

40. The final and most far reaching phase of these reforms has now unfortunately been delayed from the original deadline of April 2019. Once Parliamentary time is secured to introduce the new regulations, there will be a six month lead-in period to help forces and PCCs prepare for implementation. The reforms seek to deliver the following cultural and organisational transformation in order to improve the system for all:

- 1) The complaints system is more customer focused. (for complainants and those accused/investigated).
- 2) The system is less bureaucratic providing Police forces, PCC's, the IOPC and respective decision makers with greater discretion.
- 3) The system is more expedient, transparent and independent with local oversight by PCC's.
- 4) That the system is less adversarial, and learning is placed at its heart. So lower level misconduct can be dealt with professionally outside of the disciplinary proceedings. This is being achieved through the introduction of 'Practice Requiring Improvement' that emphasises 'putting things right' through clear actions and constructive outcomes with an increased focus on reflection, learning and development, not blame, punishment and sanction.

41. The ethos of the changes, particularly the shift to a learning focused approach for lower level misconduct has already been adopted within PSD when completing Appropriate Authority decisions, it has proved successful and is supported by directorate management. This early adoption is supported at national level by Chief Constable Jelley as head of Professional Standards and Ethics, and by the IOPC.

## **Conclusion**

42. The number of complaints against police officers remains relatively low<sup>5</sup> given the high numbers of interactions with members of the public, often in challenging circumstances. However, the number of complex and multiple complaints and conduct matters has increased. There are also more investigations which have IOPC involvement, (this may reflect their increase in staff levels to accept a higher case load). This IOPC involvement has an impact of the PSD investigation team. The increased emphasis on learning has led to some significant changes within the Force, both in terms of improved operational procedures and in positive changes in officer behaviour.

43. Following the success of internal communication and PSD training inputs, PSD now hold regular 'drop in' sessions across the Force. PSD has seen an increase in internally referred conduct matters and requests for advice. There has been an increase in the quantity and quality of confidential anonymous reports of wrong doing to the two way reporting system 'Bad Apple', and the use of Safecall.

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<sup>5</sup> CoLP recorded 119 allegations per 1000 employees, National Average 264 allegations per 1000 employees IOPC 2018/19 – *Police Workforce, England and Wales, 31<sup>st</sup> March 2018 (National Statistics)*

44. PSD are using the 10 day scoping period prior to recording a complaint in an aim to increase an early resolution. This has seen a significant impact upon the complaints recorded against Action Fraud where complainants are often only seeking an update. This early resolution will not only increase confidence in the City of London Police but assist in lowering further the number of complaints recorded against the Force. However the intervention of Members of Parliament writing into the CoLP on behalf of constituents has increased dramatically over the last year and PSD are now recording these in an attempt to show the workload that they are generating.
45. Whilst the number of complaints against City of London officers is relatively low compared to the national statistics, due to budget constraints across all police departments, PSD continue to look for smarter working practices to assist in dealing with complaints and conduct matters concisely, impartially and ensuring that the City of London continues to deliver an exceptional policing service.

### **Appendices**

Appendix 1- Glossary of terms

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## Annex A: glossary of terms

**Allegation**: An allegation may concern the conduct of a person or persons serving with the police or the direction and control of a Police force. It is made by someone defined as a complainant under the Police Reform Act 2002 (see 'complainant' below). An allegation may be made by one or more complainants. A complaint case may contain one or many allegations. For example, a person may allege that they were pushed by an officer and that the officer was rude to them. This would be recorded as two separate allegations forming one complaint case. An allegation is recorded against an allegation category.

**Chief officer**: 'Chief officer' is a collective term that refers to the heads of police forces (chief constables for all forces except the Metropolitan Police and City of London Police, which are each headed by a commissioner).

**Complainants**: Under the Police Reform Act 2002, a complaint may be made by:

- a member of the public who claims that the conduct took place in relation to them
- a member of the public who claims they have been 'adversely affected' by the conduct, even though it did not take place in relation to them
- a member of the public who claims to have witnessed the conduct
- a person acting on behalf of someone who falls within any of the three categories above. This person would be classed as an 'agent' or 'representative' and must have the written permission of the complainant to act on their behalf. A person is 'adversely affected' if they suffer distress or inconvenience, loss or damage, or are put in danger or at risk by the conduct complained of. This might apply, for example, to other people present at the incident, or to the parent of a child or young person, or a

friend of the person directly affected. It does not include someone distressed by watching an incident on television.

A 'witness' is defined as someone who gained their knowledge of that conduct in a way that would make them a competent witness capable of giving admissible evidence of that conduct in criminal proceedings or has anything in their possession or control that would be admissible evidence in criminal proceedings.

One complaint case can have multiple complainants attached to it and one individual can make more than one complaint within the reporting year.

**Subjects**: Under the Police Reform Act 2002 (PRA 2002), complaints can be made about persons serving with the police as follows:

- Police officers of any rank
- Police staff, including community support officers and traffic wardens
- Special Constables

Complaints can also be made about contracted staff who are designated under section 39 of the PRA 2002 as a detention officer or escort officer by a chief officer.

**Complaint case**: A single complaint case may have one or more allegations attached to it, made by one or more complainants, against one or more persons serving with the police.

**Direction and control**: The IOPC considers the term 'direction and control' to mean general decisions about how a force is run, as opposed to the day-to-day decisions or actions of persons serving with the police, which affect individual members of the public – including those that affect more than one individual.

**Disapplication:** Disapplication only applies to allegations linked to complaint cases received on or after 22 November 2012.

A full list of the allegation categories available and their definitions can be found in the IOPC's Guidance on the recording of complaints. There are certain circumstances in which a complaint that has been recorded by a police force does not have to be dealt with under the Police Reform Act 2002 (PRA 2002). For allegations linked to complaint cases received on or after 22 November 2012, this is called disapplication. It can only happen if certain circumstances apply:

- If more than 12 months have passed between the incident, or the latest incident, giving rise to the complaint and the making of the complaint and either no good reason for the delay has been shown or injustice would be likely to be caused by the delay.
- If the matter is already subject of a complaint made by or on behalf of the same complainant.
- If the complainant discloses neither their name and address nor that of any other interested person and it is not reasonably practicable to ascertain these.
- If the complaint is repetitious.
- If the complaint is vexatious, oppressive or otherwise an abuse of the procedures for dealing with complaints.
- If it is not reasonably practicable to complete the investigation or any other procedures under the PRA 2002.

If the complaint was not required to be referred to the IOPC, the police force can carry out a disapplication. If the complaint was referred to the IOPC and the IOPC has either referred the complaint back to the force or determined the form of investigation, the force must apply to the IOPC for permission to carry out the disapplication.

**Disapplication appeal:** An appeal may be made to the relevant appeal body against the decision to disapply the requirements of the Police Reform Act 2002. There is no right of appeal where the complaint subject to the disapplication relates to direction and control or where the IOPC has given permission for the disapplication.

**Discontinuance:** A discontinuance ends an ongoing investigation into a complaint. It can only occur if certain circumstances apply:

- If a complainant refuses to co-operate to the extent it is not reasonably practicable to continue with the investigation.
- If the force decides the complaint is suitable for local resolution.
- If the complaint is repetitious.
- If the complaint is vexatious, oppressive or otherwise an abuse of the procedures for dealing with complaints.
- If it is not reasonably practicable to proceed with the investigation.

If the complaint was not required to be referred to the IOPC, the police force can discontinue a local investigation; otherwise, they must apply to the IOPC for permission to discontinue the investigation. In the case of a supervised investigation, the police force has to apply to the IOPC for permission to discontinue the investigation.

**Discontinuance appeal:** An appeal may be made to the relevant appeal body against the decision by a police force to discontinue the investigation into a complaint. There is no right of appeal where the complaint subject of the investigation discontinued relates to direction and control, where the IOPC has given permission for the discontinuance or if the discontinuance is carried out by the IOPC in relation to a supervised investigation.

Invalid appeals: There are a number of reasons why an appeal may be judged to be invalid. These are:

- If the appeal is not complete. An appeal must be in writing and contain certain information such as the details of the complaint, the name of the police force whose decision is subject of the appeal and the grounds of appeal, although the relevant appeal body may still consider an appeal even if it does not consider the appeal complete.
- If there is no right of appeal. Only a complainant or someone acting on his or her behalf can make an appeal. If anyone else tries to, the appeal is invalid. An appeal must also follow a final decision in relation to a complaint from the force (or, in the case of non-recording where no decision has been made, at least 15 working days must have passed between the complainant making their complaint and submitting an appeal against the non-recording of that complaint).
- If the appeal is made more than 28 days after the date of the letter from the Police force giving notification of the decision (which is capable of appeal) to the complainant and there are no special circumstances to justify the delay. The right of appeal in relation to direction and control complaints is limited, as noted in the definition for each appeal type above; full details can be found in the IOPC's Statutory guidance.

**Dispensation:** Dispensation only applies to allegations linked to complaint cases received before 22 November 2012.

There are certain circumstances in which a complaint that has been recorded by a police force does not have to be dealt under the Police Reform Act 2002 (PRA 2002). For allegations linked to complaint cases received before 22 November 2012, this is called dispensation. It can only happen if certain circumstances apply:

- If more than 12 months have passed between the incident, or the latest

incident, giving rise to the complaint and the making of the complaint and either no good reason for the delay has been shown or injustice would be likely to be caused by the delay.

- If the matter is already subject of a complaint made by the same complainant.
- If the complainant discloses neither their name and address nor that of any other interested person and it is not reasonably practicable to ascertain these.
- If the complaint is repetitious.
- If the complaint is vexatious, oppressive or otherwise an abuse of the procedures for dealing with complaints.
- If it is not reasonably practicable to investigate the complaint.

**Gross Misconduct:** A breach of the Standards of Professional Behaviour so serious that dismissal would be justified

**Investigation:** If a complaint is not suitable for local resolution, it must be investigated. This involves the appointment of an investigating officer who will investigate the complaint and produce a report detailing the findings about each allegation and any action to be taken as a result of the investigation. There are two different types of investigation referred to in the report:

- Local investigations: Are carried out entirely by the police. Complainants have a right of appeal to the relevant appeal body following a local investigation.
- Supervised investigations: Are carried out by the police under their own direction and control. The IOPC sets out what the investigation should look at (which is referred to as the investigation's 'terms of reference') and will receive the investigation report when it is complete. Complainants have a right of appeal

to the IOPC following a supervised investigation.

**Investigation appeal:** This applies to all complaints investigated by the police force itself or where the investigation has been supervised by the IOPC. The complainant may appeal to the relevant appeal body on a number of grounds in relation to the investigation, which are set out in the 'findings' section of the report. There is no right of appeal in relation to the investigation of a direction and control complaint.

**Investigation outcomes:**

- **Unsubstantiated / Substantiated:** These are the outcomes of allegations that have been judged solely in terms of whether evidence of misconduct was found. This outcome will only apply to allegations linked to complaint cases recorded before 1 April 2010. As time progresses there will be fewer allegations with these outcomes.

- **Not upheld / Upheld:** As of 1 April 2010, police forces are expected to also record whether a complaint is upheld or not upheld. A complaint will be upheld if the service or conduct complained about does not reach the standard a reasonable person could expect. This means that the outcome is not solely linked to proving misconduct.

**Local Resolution:** For less serious complaints, such as rudeness or incivility, the complaint may be dealt with by local resolution. Local resolution is a flexible process that can be adapted to the needs of the complainant. A local police supervisor deals with the complaint, which might involve providing an explanation or information; an apology on behalf of the force; providing a written explanation of the circumstances and any action taken; or resolving the complaint over the counter or by telephone.

**Local Resolution appeal:** Complainants are entitled to appeal to the relevant appeal body against the outcome of a local resolution.

There is no right of appeal where the complaint locally resolved relates to direction and control.

**Management Action:** A way to deal with issues of misconduct other than by formal action. They can include improvement plans agreed with officers involved.

**Misconduct:** A breach of the Standards of Professional Behaviour

**Misconduct Hearing:** A type of formal misconduct proceeding for cases where there is a case to answer in respect of gross misconduct or where the police officer has a live final written warning and there is a case to answer in the case of a further act of misconduct. The maximum outcome at a Misconduct Hearing would be dismissal from the Police Service.

**Misconduct Meeting:** A type of formal misconduct proceeding for cases where there is a case to answer in respect of misconduct, and where the maximum outcome would be a final written warning.

**Non-recording appeal:** Under the Police Reform Act 2002, the police have a duty to record all complaints about the conduct of a serving member of the police or the direction and control of a police force.

Complainants have the right to appeal to the IOPC in relation to the non-recording of their complaint on a number of grounds. These are set out in the 'findings' section of the report. The appeal right in relation to direction and control complaints is limited; full details can be found in the IOPC's Statutory Guidance.

**Sub judice:** After recording a complaint, the investigation or other procedure for dealing with the complaint may be suspended because the matter is considered to be sub judice. This is when continuing the investigation / other procedure would

prejudice a criminal investigation or criminal Proceedings. There are a number of factors Police forces should consider when deciding whether a suspension is appropriate. The complainant must be notified in writing when the investigation / other procedure into their complaint is suspended and provided with an explanation for the decision. A complainant has the right to ask the IOPC to review that decision.

**Unsatisfactory Performance Procedures**

**(UPP):** Procedures which are available to deal with performance and attendance issues.

They are not, as such, dealt with by Professional Standards, but by the Force's Human Resources Department.

**Withdrawn:** A complainant may decide to withdraw one or more allegations in their complaint or that they wish no further action to be taken in relation to their allegation/ complaint. In this case, no further action may be taken with regard to the allegation/ complaint.

**Police Terminology**

**AA:** Appropriate Authority

**ANPR:** Automatic Number Plate Recognition

**ATOC:** (Association of Train Operating Companies) agreements.

To be authorised to travel within the ATOC agreement warranted officers must sign to join the scheme and an agreed amount is taken from their wages at source. When they begin working at CoLP officers are provided with a warrant card which previously permitted travel on the over ground trains within a specific region in the south east of the UK. As long as the warrant card did not have the words 'Not for Travel' across it officers were considered to be in the ATOC agreement. This has since changed and officers now receive a Rail Travel card to be shown alongside their warrant card to confirm they are in the agreement.

Other forces have similar schemes including Essex Police who issues their officers in the

agreement with a travel card. This has to be shown with a warrant card. With both CoLP and Essex Police when officers leave the force they are required to hand back both their warrant and travel cards. If they are transferring forces and required to travel by train the expectation would be that they would buy a train ticket on their first day before their new warrant card and now travel card are issued.

**BWV :** Body Worn Video

**CAD:** Computer Aided Dispatch

**CCJ:** County Court Judgement

**DPS:** Directorate Professional Standards  
(Metropolitan Police Service)

**DSI:** Death or Serious Injury

**ECD:** Economic Crime Directorate

**FI:** Financial Investigator

**HCP:** Health Care Professionals

**I&I:** Intelligence and Information Directorate

**IOPC:** Independent Office of Police Conduct

**MIT:** Major Investigation Team

**MPS:** Metropolitan Police Service

**NFA:** No Further Action

**NUT:** National Union of Teachers

**PCO:** Public Carriage Office

**PHV:** Private Hire Vehicle

**PIN:** Police Information Notice

**PMS:** Property Management System

**PNC:** Police National Computer

**POCA:** Proceeds of Crime Act

**SAR:** Subject Access Request

**SAR:** Suspicious Activity Report

**SIO:** Senior Investigating Officer

**SOP:** Standard Operating Procedure

**STOT:** Safer Transport Operations Team

**TFG:** Tactical Firearms Group

**TfL:** Transport for London

**TPH:** Taxi and Private Hire

**UNIFI:** City of London Crime and Intelligence  
Database

**UPD:** Unformed Policing Directorate

<b>Committee(s):</b> Police Authority Board- For information	<b>Date(s):</b> 11 <sup>th</sup> July 2019
<b>Subject:</b> Community Scrutiny Group and Independent Advisory Group Arrangements	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 59-19	<b>For Information</b>
<b>Report author:</b> Lee Presland, Superintendent UPD	

## Summary

The Independent Advisory Group (IAG) is a strategic group that seeks to improve two-way communications between the police service and the diverse communities it serves. Closely linked to the IAG and often a sub-group in many forces is the Community Scrutiny Group (CSG) whose core responsibility is to monitor the legitimacy of a force's stop and search activities and use of force.

The effectiveness of the IAG and CSG has been recently called into question by HMICFRS during the recent PEEL Integrated inspection of the Force and highlighted lack of external scrutiny as an issue and commented that the local IAG and CSG have not been functioning effectively for some time.

As a result, the CoLP Chief Officer Team gave direction that the functioning and activities of the IAG and CSG be reviewed in consultation with the members, to potentially identify areas for improvement or causes for concern and to implement any recommendations for improvement that were made. This process has been carried out and a key recommendation supported by members, the Chief Officer Team and other senior managers and officers within CoLP has been made that the IAG and CSG be merged into a single Independent Advisory and Scrutiny Group (IASG).

This report outlines the planned stages towards this merger and is submitted for information.

## Recommendation

Members are asked to note the report.

## Main Report

### Background

1. At the beginning of 2018, the Commissioner and Assistant Commissioner commissioned a review of Force community engagement to ensure it was capturing the views of the community and people they serve. This review gained

momentum after the findings of HMICFRS in their Integrated PEEL inspection which was published in April 2018.

2. Findings included:

### **Independent Advisory Group (IAG)**

- Insufficient number of members regularly attending to fulfil its minimum requirement to operate legitimately
- A lack of adherence to its constitution in terms of time of office for the Chair and other office holders
- An absence of police liaison and attendance at a senior level in more recent times (superintendent or above)
- A lack of inclusion or updates from the Force to the IAG in relation to key policing decisions and activities
- A potential for duplication of activities given the similarity of aims and objectives to those of the CSG

### **Community Scrutiny Group (CSG)**

The main issue with the CSG has been a virtual absence of membership attendance laid out in the details of meetings below:

- Jan 2017 CSG meeting cancelled by chair owing to operational demand
- 25<sup>th</sup> April 2017 – Chair held meeting at Bishopsgate Police Station; three members of the CSG attended.
- 25<sup>th</sup> July 2017 – Chair cancelled meeting due to heightened terrorist threat in London based on operational demand.
- 25<sup>th</sup> October 2017 – Deputy Chair held meeting at Wood Street; one member of the CSG attended.
- 28<sup>th</sup> March 2018 –Deputy Chair held meeting held Wood Street; two members of the CSG attended.
- Both the chair and deputy of the group were also police officers thereby affecting its ability to operate independently

### **Current Position**

#### **The IAG**

3. The City of London Independent Advisory Group was established over a decade ago. Specifically as per the information on the Force's website, the IAG should undertake the following:

- Advise the City of London Police on critical incidents in relation to the community
- Advise on City of London Police policy and high impact issues concerning Black and Minority Ethnic communities e.g. Stop and Search, recruitment and retention of officers.
- Advise on the impact on the community of operational and tactical policing issues



- Interact with the community the City of London Police serve to help promote an inclusive approach.

## **The CSG**

4. Recruitment to the City of London Community Scrutiny Group is ongoing and currently being advertised on the Force's website and via other avenues, including community forums, residents and business forums and the advertisement has been forwarded to Members by the Town Clerk for their dissemination to networks and contacts. Its remit is simply presented as 'independent of the police, the group can ask questions related to the policing of the City, hold the force to account and challenge the way the City of London Police operates.'
5. 12 members have currently been recruited (subject to successful vetting) who are reflective of the greater London population. All members were invited to attend an induction day on Tuesday 11<sup>th</sup> June 2019. The induction meeting provided the CSG members with an understanding of police community scrutiny groups, training, Terms of Reference, Stop & Search, Use of Force, Spit Guards and Limb Restraints and police feedback. The CSG will now receive some high level training on policing matters to enable them to provide the force with constructive feedback.

## **Proposals**

6. As a result of the outcome of the Community Engagement review and the HMICFRS PEEL Inspection recommendation, a number of recommendations have been made and agreed by the CoLP Chief Officer Team which have either been completed or are in the process of being completed:
  - To increase and maintain the number and diversity of membership of the IAG through active and ongoing recruitment.
  - To ensure a minimum attendance and maximum time in office of IAG members to enable it to fulfil its requirements and maintain its legitimacy
  - To ensure police attendance at IAG meetings at a senior level (superintendent above)
  - To ensure the IAG is regularly updated of Force performance and key strategic changes
  - To look to merge the functions of the IAG and CSG to create an independent advisory and scrutiny group (IASG) to improve representation and resilience.

## **Timetable for implementation of recommendations**

7. As detailed above in the 'Current Position' section the recent campaign to recruit members for a CSG identified 12 new members from diverse backgrounds. They have been advised and are supportive of the concept of an IASG and their membership within it.
  - The IAG has recently increased its membership to eight and has managed to fulfil the attendance requirements for its last two IAG meetings.
  - An officer of superintendent rank has attended the last two meetings of the IAG and this is mandated to continue

- The IAG has recently been provided with inputs on force performance, the force change programme- Transform; and an input on counter terrorism prevention activities. Further presentations are planned in future meetings
- 26 June 2019 – is the next meeting of IAG to discuss and ratify creation of the IASG as per proposed new terms of reference (See Annex A)
- 4 September 2019-First meeting of IASG to include members of CSG. Nominations and election of new chair and committee members.
- Subsequent dates of IASG to be arranged

## **Corporate & Strategic Implications**

8. This will support the City of London Corporation Corporate Plan 2018-23 theme of:
- **Contribute to a flourishing society**- people are safe and feel safe

This will support the City of London Police Corporate Plan 2018-23 themes of:

- **To make the City of London the safest city area in the world**, regarded as a centre of excellence for protective security. We will use state of the art technology to protect the City of London and put us at the forefront of criminal investigation in a rapidly evolving landscape of crime.
  - **To deliver a policing service that is valued** by those who live, work and visit the City of London. By ensuring that the Force engages with these groups it will be able to assess the impact of the policing response on the Community.
9. The engagement with these groups will enable the Force to ensure that it can support these themes by receiving external scrutiny and feedback on the policing response.

## **Consultation**

10. The Chair of the IAG, has been fully briefed of plans and supports the principle of a merger of the two groups. He has indicated he will not be seeking re-election. The merger will be discussed with members at the next IAG on 26 June 2019. Members of the IAG have been sent the terms of reference for the new IASG and an accompanying explanation based on the recommendations.
11. The proposal has also been circulated internally in CoLP and the Strategic Management Board members are supportive of the proposed approach.

## **Conclusion**

12. Members will understand the need to have a truly effective advisory and scrutiny group that challenges the force in an appropriate way. It is considered that the recommendation to have a refreshed and reinvigorated single group will make this happen rather than retaining the two groups which are currently not operating effectively or legitimately.

**Appendices-** Annex A – City of London Police Independent Advisory & Scrutiny Group proposed Terms of Reference

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## **City of London Police Independent Advisory & Scrutiny Group**

### **Terms Of Reference**

Independent involvement and advice is the process which takes place when, people independent of the police service, monitor, observe or advise on aspects of policing, both in terms of the functions and policies of the service and the way in which the police interact with the broader community.

#### **1.0 Article 1 – Name**

- 1.1 The group's official name will be 'City of London Police Independent Advisory and Scrutiny Group'. (IASG)

#### **2.0 Article 2 – Address**

- 2.1 Secretary of IASG to be determined.

#### **3.0 Article 3 – Aims**

- 3.1 To work as partners with the police service to:
  - 3.1.1 Increase trust and confidence in policing amongst all communities.
  - 3.1.2 Provide constructive advice to the organisation on ways to improve the quality of service delivery to all communities.

#### **3.2 Objectives**

- 3.2.1 To critically appraise organisational policies, practices and procedures.
- 3.2.2 To make significant contributions to both strategic and tactical considerations seen at draft stage, particularly with reference to critical incidents.
- 3.2.3 To make observations both within the police service and the role it plays in the wider community.
- 3.2.4 To instil just and fair relations between the police and the communities they serve, as well as between communities.
- 3.2.5 To provide an effective external monitoring process to ensure that the force is adhering to both use of force and Best Use of Stop and Search (BUSS) principles, in particular ensuring both qualitative and quantitative data is monitored.

#### **4.0 Article 4 – Membership**

- 4.1 The membership of the IASG will be open to individuals who reside, work or frequent the City of London.
- 4.2 Appointment to the IASG will be the decision and responsibility of the host organisation, in consultation with the IASG.
- 4.3 Appointments to the IASG will be transparent to public scrutiny, as will the details of tenure and remuneration.

- 4.4 Ideally the IASG will consist of a cross-representation of the area's diverse communities recognising the 6 diversity strands, age, race, religion and belief, gender/transgender, sexual orientation and disability. Members should also include representatives from local residential and business communities.
- 4.5 It is expected that members will serve for a term of four years with a maximum of two terms. An Independent Advisor may apply to serve a second term, subject to the support of the respective IASG Chair, and with the agreement of the host organisation's lead for IASG.
- 4.6 The group will consist of no less than seven members, and no more than 15 members.
- 4.7 Designated leads and deputies will be selected from members for the key areas of stop search and use of force.
- 4.8 Members of the IASG may be de-selected by the host organisation in the following circumstances:
- The member has failed to attend three consecutive meetings of the IASG without giving an apology or acceptable reason, other than special or urgent meetings;
  - Failure to fulfil designated actions or prepare for meetings;
  - The representative's membership would undermine the credibility and legitimacy of the group or fundamentally weaken aspects of its work;
  - Any breach of the operating protocols set out within this policy;
  - The member has broken the Code of Conduct as set out in Appendix D to this policy.

## **5.0 Article 5 – Election of the Executive Committee**

- 5.1 The elected officers of the IASG may consist of a Chair, Vice-Chair, and Secretary and elections will take place once a year: this group will be the Executive Committee. Failure to appoint one or more of these positions will not render the work of the executive invalid.
- 5.2 The Chair, Vice-Chair and Secretary shall be elected by those present and voting at the meeting.
- 5.3 At least two calendar months' notice will be given of an election.
- 5.4 The term of office for executive members is one year. They may apply to serve a second term, subject to the support of the respective IASG Chair, and with the agreement of the host organisation's lead for IASGs.
- 5.5 Temporary vacancies among the executive shall be filled by nomination.

## **6.0 Article 6 – Executive Committee**

6.1 The duty of the Executive Committee will be to:

- manage the IASG
- ensure meetings are planned, reviews are undertaken of minutes and papers
- act as a point of contact between meetings.

## **7.0 Article 7 – Meetings**

7.1 The IASG will take place on a quarterly basis. Times and days may fluctuate to accommodate the needs of all members.

7.1 Members are expected to allow and encourage all colleagues to fully participate in discussions in an open, free and constructive manner.

7.2 It is a fundamental principle of the group that it is opposed to discrimination on the grounds of political opinion, religion, race, gender, sexual orientation, disability, or age and that it shall not practice such discrimination. The group shall not give a platform to extremist political or religious groups. There should be mechanisms in place to remove members from the group, if they incite racial hatred or advocate discrimination on the grounds outlined above.

7.3 In order to fulfil its primary purpose of providing independent advice to the police service, IASGs must have access to relevant, up-to-date information.

7.4 Access to some information may be prohibited by law e.g. Official Secrets Act, Data Protection Act. Additionally some information may be so sensitive that its divulgence would be inappropriate. This might include confidential matters relating specifically to individuals, specific intelligence in relation to a proposed sensitive policing operation, or intelligence which might compromise the safety of individuals or the police or the public at large.

7.5 Standing agenda items will include (but will not be limited to):

- Stop search, use of force (including Taser/PAVA spray/spit guards and leg restraints data shown by gender, age and ethnicity.)
- Information on any trends relating to complaints, data sets or any other causes for concern.
- Current versions of any on-going action plans in relevant areas, to allow review of progress against issues.
- Updates on any new local or national schemes or guidance and the force's compliance against these.
- Review of membership and identification of new members to ensure effective representation is an on-going consideration.
- Communication of key messages, data and documents and review of availability to the public

## **8.0 Article 8 – Quorum**

8.1 The numbers of full voting members required to be physically present to make decisions at regular meetings will be 4. Where it is necessary to make

decisions regarding the IASG working methods, IASG membership or rules of the group then a simple majority of full voting members must be physically present to vote.

- 8.2 The group needs active participation so members who fail to attend 3 consecutive meetings in any one-year without satisfactory reason can be asked to resign if the chair proposes it and the majority of members present agree.

## **9.0 Article 9 – Finance**

- 9.1 Where relevant, the Police will reimburse all members for reasonable out of pocket expenses.
- 9.2 Claims for reimbursement of incurred expenses will be in line with normal force procedure.
- 9.3 The control for the funding of the IASG will be done by the Police in line with standard operating procedures, and must be fully auditable.

## **10 Article 10 – Dissolution Procedure**

- 10.1 If the Executive Committee, by a simple majority, decides at any time that it is necessary or advisable to dissolve the network, it shall call an Extraordinary General meeting of all members of the IASG who have the power to vote.

## **11 Article 11 – Code of Conduct**

- 11.1 The Code of Conduct for the time being shall be that every member shall discharge their duty with integrity, fairness, politeness, tolerance, courtesy, respect, openness and truthfulness and without fear or favour. In particular, every member shall:
- Avoid all form of harassment, victimisation, unreasonable discrimination, abusive or derisive attitudes or behaviour towards other individuals and groups;
  - Behave in a manner that does not bring discredit to the group.
  - Avoid favouritism to any particular individual or group.
  - Treat any information that comes into their possession during the course of their duties as confidential, and shall not use it for personal benefit, nor shall they divulge that information to other parties except in the proper course of the IASG business.
- 11.2 Any member of the IASG who knowingly breaches the aims of the Group (Article 3), or commits any act (by word or deed), which may be deemed by the Executive Committee, as being detrimental to the Group, shall have his or her membership, revoked upon a majority vote of the Executive Committee.

## **12 Article 12 – Miscellaneous**

- 12.1 Members who advise police are not liable for the outcomes of police decision-making and are not answerable to the police.
- 12.2 The police are not obliged to follow advice given by members, although appropriate explanations should be given where advice is not taken

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<b>Committee(s):</b> Police Authority Board- For information	<b>Date(s):</b> 11 <sup>th</sup> July 2019
<b>Subject:</b> Quarterly Community Engagement Update	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 57-19	<b>For Information</b>
<b>Report author:</b> T/Chief Inspector Jess Wynne, Communities and Partnerships	

## Summary

This report provides an update on engagement activities across five main areas: (1) Counter Terrorism (CT) and communications; (2) Safeguarding the Vulnerable; (3) PREVENTion of Fraud; (4) Anti-Social Behaviour (ASB); (5) Policing the Roads, (6) Community Engagement Review.

**Counter-terrorism and Communications:** Work within CT continues. The team is continuing with their national responsibilities to engage and ensure continuous improvement in security of key sites. Prevent workshops and awareness presentations provided across the City to a number of businesses and institutions.

**Safeguarding and Vulnerability:** The mental health street triage scheme continues to be a success. This service has now increased operational hours to 7 days a week.

**PREVENTion of Fraud and Cyber Crime:** Cyber Protect capability is now live within the Force. A number of cybercrime prevention presentations have been delivered to organisations, front line officers and schools across the City. CoLP is now investigating a similar number of cybercrimes when compared to larger, regional organised crime units (ROCU's).

**ASB:** Work is ongoing with partner agencies and local businesses to reduce instances of ASB.

**Policing the Roads:** The Roads Policing team continue to conduct enforcement operations around Road safety priorities and working with partners in TFL and the Metropolitan Police Service to support compliance and licensing obligations.

## Recommendation

It is recommended that Members receive the report and note its contents.

## **Main Report**

### **Counter Terrorism**

#### **1. PREVENT:**

##### **Delivering WRAP sessions, meetings and Prevent sessions**

- 1.1 The Prevent Team has delivered 3 sessions of the mini Workshops to Raise Awareness of Prevent (WRAP) to Grange City hotel staff, plus 4 full WRAP sessions to a major construction company, which has requested another 4 sessions and would like Prevent stalls at their sites, as they have a multi-cultural work force. A refresher WRAP talk has also been given at Charterhouse School as a refresher.
- 1.2 National Association of Muslim Police -2 days in Bradford, the Prevent team provided an input on what we do in the City
- 1.3 Prevent input given to the apprentices at the Guildhall on an ongoing basis and a CoLP Induction day for Special Constabulary. Other groups given input include Shoe Lane library staff; Independent Advisory Group; Supervisors at a major supermarket chain who are located at different sites; 50 overseas students at Coventry University, and internally, ongoing input to CoLP Uniform Response groups/ CoLP Control Room staff;

##### **Meetings**

- 1.4 Prevent meetings have been held with Bank of England security/vetting officers, Security Manager of a high street bank in order to discuss future training opportunities for staff;
- 1.5 meetings with the Christian Faith group forum in the City Denary and Faiths Forum for London to discuss working with youths in the city;
- 1.6 The Prevent team also attended the Education Safeguarding Forum, and gave an input on prevent to safeguarding leads in City and Hackney schools; they also attended Coventry University Prevent Steering Group.
- 1.7 The team also attended a prevent meeting with Northumbria University, at 110 Middlesex Street where there were prevent leads from many other UK universities.
- 1.8 The Prevent team continue to attend Regional meetings working with the Prevent teams from around the country looking at ways of improving professional and best practice.

### **Prevent referrals and other actions**

- 1.9 The Prevent team has continued working on Prevent referrals over this period. There have been seven referrals to date; two City based referrals, one of which is still ongoing. Other referrals have been identified and passed to the Metropolitan Police Service for further action as appropriate.

### **Internal Women's Network/Islamic Women's Network**

- 1.10 Prevent officers have continued supporting some of the various networks to understand the role of Prevent to enable the network members to have the knowledge and confidence to come forward with any concerns.
- 1.11 An Officer attends the Islamic Women's Group on a weekly basis, and has a good rapport with them which is encouraging good two way engagement.

### **Face to Face Meeting/stalls**

- 1.12 The Prevent team has visited Wandsworth Prison, met with prevent leads and discussed trends and intelligence gathering, as many offenders dealt with by CoLP are sent to this prison owing to its proximity.
- 1.13 Ongoing prevent stalls alongside victim support at:
- Aldgate café
  - Artisan library
  - Shoe lane library
  - Salvation Army Headquarters
  - St Bart's Hospital
  - Savills, Fleet Place House
  - Fresher's fair Coventry University for around 150 foreign students
  - Prevent stall at the apprentice safeguarding day at the GUILDHALL.
  - City wide residence meetings alongside corporation of London on 8<sup>th</sup> May 2019.

### **Practical Training Package**

- 1.14 The Prevent team has produced a practical training package to identify signs of radicalisation and what to do when this occurs. The package is complete and includes a case study, the definition of radicalisation, the aim of the Contest strategy and understanding of the 4 P's and where Prevent sits in the Force. Currently over a 150 people have been trained and will be carrying out this work over this year to ensure as many of the Force are trained as possible.

### **Mobile networking group**

- 1.15 A Prevent referral document has been uploaded onto the portable mobile working devices for officers to use. This work has now been completed meaning that officers can fill out Prevent referrals whilst on mobile patrol.

### **Counter Terrorism Local Profile (CTLP)**

- 1.16 On 17<sup>th</sup> July there is a CTLP awareness date at Wood Street Police Station where stakeholders will attend and be given information on how best to feed into the CTLP and what they will get out of contributing to the CTLP, which will also raise more awareness around prevent.

### **Other**

- 1.17 The City of London Corporation has recruited an individual for the role of Prevent coordinator /Safeguarding officer, this is subject to successful vetting.

## **2. PREPARE & PROTECT:**

### **Counter Terrorism Security Adviser (CTSA) team:**

- 2.1 The CTSA team proactively support the Protect and Prepare elements of the national CONTEST Strategy, delivering on protective security advice, CT awareness, both physical and people security measures and ensuring the community is as prepared as possible in dealing with a terrorist attack.
- 2.2 To achieve this during March, April and May 2019 the team has delivered a variety of products to 1875 people. This has been in a variety of forms, including ACT Awareness sessions hosted at Wood Street, bespoke sessions tailored for specific business sectors, document awareness training for HR Professionals, postal security processes, and various site risk and vulnerability assessments. The team has delivered Project Argus to 255 policy makers for businesses in the City, helping them to develop their strategies for dealing with a CT incident and focusing on the prepare element of the CT Strategy. The delivery of the SCAN<sup>1</sup> Programme has increased during this period as all the team are now trained to deliver the suite of Centre for the Protection of the National Infrastructure (CPNI) products. Demand is being managed by a prioritisation process which ensures correct allocation of resource and time. The feedback from these courses is very positive and the City continue to lead the way nationally on the roll out, with over 215 security officials trained during this period. The City also still leading on the national roll out of training, co-ordinating the delivery of the train the trainer course and collating the national statistics around the delivery of SCAN.
- 2.3 The CTSA's continue contributing to the national review of the Protective Security Improvement Activity (PSIA) process, which is a mentored approach to improving security at nationally (and locally) identified priority sites and crowded places. The National Counter Terrorism and Security Office (NaCTSO) are due to release their revised guidance on Crowded Spaces which is likely to impact the work load of CTSA's nationally, as more areas and locations will become subject to the PSIA process, by falling within the definition

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<sup>1</sup> SCAN- See Check And Notify

of a crowded place. The team are monitoring the impact this will have on the City in terms of resourcing implications to meet requirements.

- 2.4 The team remains integral in the public realm improvement and planning process ensuring that both existing public realm and those areas either in planning or development, are subject to proportionate security review in partnership with the Department of Built Environment (DBE). This has resulted in some significant improvements in security in a number of key sites, with others in progress. There are a number of sites under review and the team work closely with DBE to help review existing locations, planned redevelopments and developments.
- 2.5 With still a relatively new team, it is in the middle of conducting a number of full site vulnerability assessments across the City at key locations. This is an immersive process that looks at every aspect of security relevant to the site. This assessment continues and will ensure that some of our more iconic and vulnerable sites have all the information they need to be effective as possible in terms of security. A new member of staff is due to join the team in July, bringing the team up to strength.
- 2.6 On the horizon the team will be working on understanding the impact of the Crowded Places reviews, particularly as we head into Summer and the number of outdoor areas become busier.

### **3. Safeguarding and Vulnerability**

- 3.1 The CoLP Child Sexual Exploitation (CSE) protocol has been reviewed and updated. The terms of reference for City of London Corporation (CoL) and CoLP have been expanded so that multi-agency meetings will include child criminal exploitation as well as child sexual exploitation. This puts the City ahead of other forces who are yet to tackle this emerging field. A new vulnerable adolescents profile is being drafted and new data sets created around juveniles in custody to better understand issues and trends in this area.
- 3.2 Support for vulnerable people is increasing with a part time Vulnerable Victim Advocate being recruited to support the current one who is also working on the City Domestic Abuse/ Vulnerability Policy. In addition MOPAC has recruited a part time Domestic Abuse Advocate to be based in Bishopsgate. They will take part in case work, auditing for quality of service and engagement.
- 3.3 A second phase of Op Alarm Call which tests City Hotel's responses to CSE threat took place to coincide with CSE awareness week. Follow up debriefs and training with the business community are ongoing in conjunction with the Shiva foundation who work to combat modern slavery.
- 3.4 The Force achieved a 90% prosecution rate for domestic cases last financial year. CPS applauded the City charging and prosecution rates as being above the regional trend. Positive feedback was received from a reviewing senior prosecutor when dip-sampling out of court disposals. The draft PEEL inspection

indicates that the force rated as GOOD in the area of protecting vulnerable people. Contextual comments suggest that the result was a very high good.

#### **4. Prevention of Fraud and Cyber Crime**

4.1 Cyber Griffin, the City of London Police initiative focused on helping people in the square mile protect themselves from Cyber Crime is building momentum. In terms of engagement to date:

- 14 public base line briefings have taken place
- which 630 people attended
- 18 Decision and Disruption table top exercises have been completed across 13 separate organisations.
- Relationships established with over 50 businesses in the City who will receive briefings and training in the near future.

4.2 It is too early to establish the impact of Cyber Griffin in terms of reducing the amount of attacks, what can be said is CoLP are helping organisations build resilience to respond to cyber incidents through planning and exercising.

CoLP's aims are:

- 75% of organisations and the public who receive PROTECT advice will change their behaviours as a result – Current feedback suggests this is being achieved.
- 75% of organisations who receive PREPARE advice will develop or review incident response plans and test them – Current feedback suggests this is being achieved.

Developments:

- Public Cyber Griffin briefings are growing steadily in popularity. Currently, briefings are fully booked a month in advance.
- The business continuity services offered under Cyber Griffin may shortly be upgraded using specialist software. This adds a comprehensive assessment tool to the current approach.

#### **5. Tackling and Preventing Anti-Social Behaviour (ASB)**

##### **Anti-Social Behaviour**

5.1 There is currently no ASB data available. Due to a data integrity issue that was highlighted at the Force Crime Standards Board no figures for ASB have been produced since February 2019. The Force Performance Information Unit are working to resolve the issue along with the Chief Inspector Intelligence & Information. The issue is around officers using the relevant qualifier when recording ASB on Niche, the force's crime and intelligence recording system. Currently the recording practices used do not give confidence in the figures being extracted from the system and work is being undertaken to improve ASB recording practices so that a retrospective report can be completed as soon as possible to inform on this area. This work is all being overseen by the Crime

Standards Board. Members were informed of this and received a detailed update at the Performance and Resource Management Committee on 21<sup>st</sup> June 2019 where it is being monitored. Data will be available for the next quarterly update at the October Police Authority Board.

- 5.2 The Force however continues to tackle ASB as a priority through appropriate tasking as this is important to the community.

### **Begging (Op Luscombe)**

- 5.3 At your January 2019 meeting the Commander Operations and Security undertook to review Operation Luscombe at the end of the financial year 2018-19 (OR 3/2019/P). This is detailed below.
- 5.4 Op Luscombe has now been running for 13 months and has produced good results in the disruption and exclusion of some of the City's most prolific beggars. In the early stages of Operation Luscombe, the Force had a significant number of entrenched beggars that were also classified as rough sleepers. Due to the nature of their behaviour they were included in the proactive early intervention strategy or excluded from the City of London.
- 5.5 Early intervention using the traffic light system has meant that CoLP has successfully discouraged the further entrenchment of a number of nomadic style beggars that have moved into the City of London and CoLP will continue to target these individuals as appropriate by diverting and liaising with appropriate health partners, outreach groups and charities for those with identified addictions who are willing to undergo treatment, or alternatively if they are not, then seeking order to exclude them from the City as appropriate.
- 5.5 There are currently two individuals subject of Criminal Behaviour Order applications on hold whilst the Force endeavours to obtain a new Community Impact Statement. The previous statement had a significant impact at Court, but was unfortunately withdrawn due to personal circumstances of the author.
- 5.6 CoLP has recalled two Criminal Behaviour Order applications after the subjects engaged with outreach and drugs rehabilitation services, thereby avoiding court action and diverting themselves away from the criminal justice system. (We retain this material for use in any future court proceedings, should they re-offend).
- 5.7 Operation Luscombe led to the prosecution and subsequent Criminal Behaviour Order of the most prolific beggar within the City of London. Since the order was made, the individual has not come back to police notice and is now engaging with services in Tower Hamlets, which is a positive outcome for both the individual and the City community.
- 5.8 Luscombe was originally developed after a Problem Profile was produced in response to concerns raised by the community and through elected Members and has been an experimental approach as a means to target and deal with

wide scale begging and as such is due to be refreshed to gauge whether it should continue in its current form.

- 5.9 Head of Community Policing has requested a full re-assessment by the Force Intelligence Bureau of the begging problem in the City of London to conduct a comparative review on begging, which we hope will enable the Force to better understand what impact the operation has had and potentially how it can be improved. Further updates on this will follow in the regular quarterly updates to this Board.
- 5.10 The Force is working to achieve a more joined up working relationship with the British Transport Police (BTP) at the major commuter hubs within the City of London on this issue after a wide scale change of management had an impact on the effectiveness of the operation around and inside certain mainline stations. CoLP hopes to encourage and work with BTP colleagues all levels on the current approach to tackling the problem, as this does have a direct impact on our own operational effectiveness.

<b>Total notices issued</b>	<b>Green</b>	<b>Yellow</b>	<b>Red</b>	<b>Blue</b>	<b>CBO</b>
Hub 1 – May (1) 2018	31				
Hub 2 – May (2) 2018	20	3			
Hub 3 – June (1) 2018	16	10	1		
Hub 4 – June (2) 2018	13	9	6	1	
Hub 5 – July 2018	6	3	1		
Hub 6 – August 2018	3	2			
Hub 7 – September 2018	9	1	1		
Hub 8 – October 2018	4	1	1	1	
Hub 9 – November 2018	10	1	1	1	
Hub 10 – December 2018	7	1			
Hub 11 – January 2019	1	5	1		
Hub 12 – February 2019	5	2	2		
Hub 13 – March 2019	8	3	5	2	
Hub 14 – April 2019	1		1		1
Hub 15 – May 2019	4	2			
<b>Total</b>	<b>138</b>	<b>43</b>	<b>20</b>	<b>5</b>	<b>1</b>



Process:

Stage 1 – Initial ‘Green’ intervention ticket and invitation to a joint partnership working ‘Hub’. Hub to be organised bi-weekly.

Stage 2 – Re-offenders will be given a ‘Yellow’ intervention invite and a CPN. There will be a requirement to attend an intervention hub.

Stage 3 – Re-offenders will be issued with a ‘Red’ intervention full CPN. This will be for breach of condition on the CPN.

Stage 4 – Re-offenders will be dealt with by means of summons or arrest and a CBO application ‘Blue’.

## **Marathon 2019- ASB**

- 5.11 In April 2019 the London Marathon took place. A significant part of the route comes through the City of London. Over the last five years there have been increasing levels of anti-social behaviour in the area of Byward Street and Trinity Square by groups that use this area to congregate. This year, in conjunction with the London Marathon management team, significant changes were made and a number of measures and tactics introduced to ensure that this ASB and disorder did not reoccur and that those community members who had attended to enjoy the event were able to do so. The changes included adjustment to barrier plans; a S35 Dispersal order was put in place and enforcement officers from Tower Hamlets were deployed to ensure no drinking occurred in Trinity Gardens.
- 5.12 However, despite all these mitigating factors, ASB and disorder did occur as the problem was displaced to the area of Great Tower Street. Approximately 500 youth were present, a significant proportion of which were highly intoxicated. Unfortunately there was disorder which did result in arrests for violent disorder, grievous bodily harm and possession of class A drugs. During the arrest phase, one of the police horses, whilst moving forward to protect officers who were carrying out an arrest of a violent individual, unfortunately fell over, trapping the mounted officer under the horse resulting in the officer receiving a broken ankle.
- 5.13 As a result of this disorder, the history of ASB in this location over the years and feedback from Community Engagement events, representations are being made to the City of London Corporation to impose a Public Space Protection Order for the Marathon next year. Engagement Meetings have been held with the Safer City Partnership, Corporation Legal team and the Department of the Built Environment to discuss this process. As a result of these meetings, a full report will be submitted to the Court of Common Council for consideration in due course.

## **6. Policing the Roads**

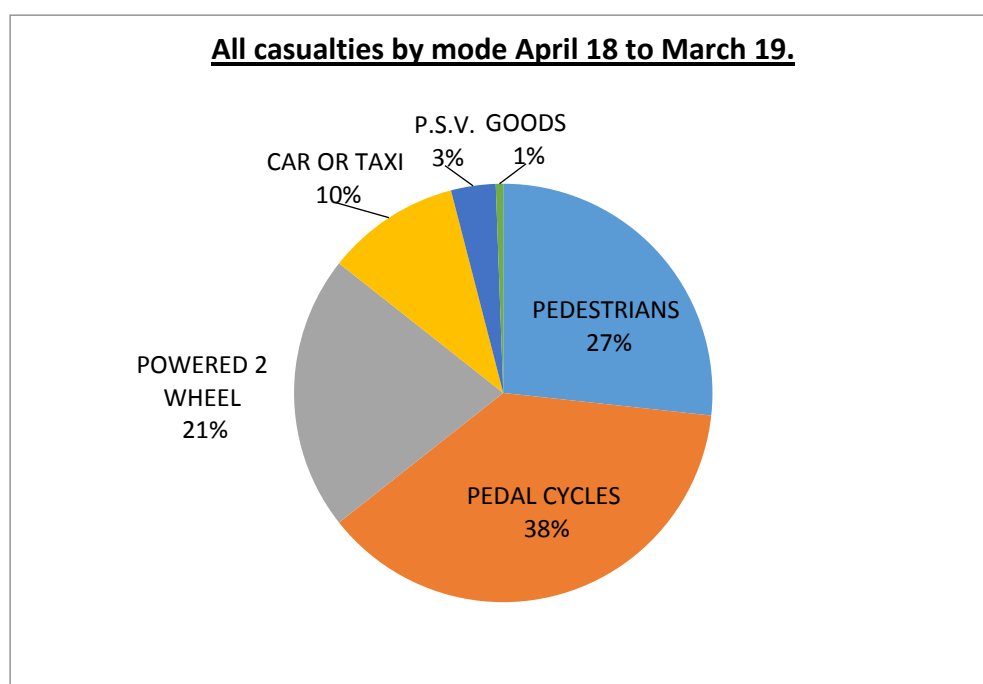
- 6.1 The City of London Police re-launched its traffic unit in April 2019 as the Roads Policing Unit (national identity). Significant progress has been made and the unit is up to strength and now has the skills to address the great challenge of eradicating KSIs (Killed and seriously injured) within the square mile. The team continue to focus on enforcement activities including working with partners on

specific initiatives such as Op Atrium which is an operation aimed at commercial vehicles and cycles to reduce casualties and raise awareness of each other.

- 6.2 The below tables show the annual KSI breakdown statistics for 2017-18 and 2018-19 which shows a reduction and a downward trend year on year. It is hoped that this will continue for 2019-20.

	2018/19				2017/18			
	FATAL	SER	SLIGHT	TOTAL	FATAL	SER	SLIGHT	TOTAL
PEDESTRIANS	0	26	67	93	2	26	80	108
PEDAL CYCLES	0	35	96	131	0	20	98	118
POWERED 2 WHEEL	1	9	64	74	0	11	63	74
CAR OR TAXI	0	2	34	36	0	1	56	57
P.S.V.	0	2	10	12	0	1	19	20
GOODS	0	0	2	2	0	1	2	3
OTHER	0	0	2	2	0	0	0	0
Total Casualties	1	74	275	350	2	60	318	380
<b>PI Collisions</b>	<b>1</b>	<b>73</b>	<b>241</b>	<b>315</b>	<b>2</b>	<b>59</b>	<b>276</b>	<b>337</b>

- 6.3 At your April meeting members asked for a breakdown of KSIs by mode, this is shown below.



ROAD POLICING AND SMOOTHING TRAFFIC FLOW		
		2018/2019
Other operations	Phones/ Seatbelts	312
Speeding in the 20mph zone	TOR	161
TOTAL		473
Number of vehicles seized from ANPR only		107
Total number of vehicles seized from ANPR / No Ins or No DL or both		533
Number of pre-planned enforcement and/or education operations targeting Large Goods Vehicle within City of London		116
Number of LGV's stopped		835
Number of LGV's stopped with offences		612
Number of offences		1321

- 6.4 The main issues over the past quarter have centred on the Ludgate Circus corridor road safety issues, and cyclists using Castle Baynard in an antisocial manner. The Force continues to engage and work closely with colleagues in the City of London Corporation (CoLC) and Transport for London (TfL) to address the issues relating to road safety. Whilst Ludgate Circus has been highlighted for the past quarter, this has continued to be an issue at various locations across the City over the course of the year. Where this has been identified, the CoLC is consulting and working with TfL and CoLP Roads Policing Unit to consider changing the road layout to mitigate the problems, although such solutions can take time to implement.
- 6.5 Regarding the antisocial bicycle use, officers have been deployed at peak times to address the issue, engage positively with cyclists and where the behaviour persists implement s.35 dispersal notices.

## Conclusion

This report informs Board Members of some of the community engagement and intervention activities undertaken since the last report and highlights current issues and the City of London Police response.

## Contact

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<b>Committee(s):</b> Police Authority Board- For information	<b>Date(s):</b> 11 <sup>th</sup> July 2019
<b>Subject:</b> Quarterly Equality and Inclusion Update	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 58-19	<b>For Information</b>
<b>Report author:</b> Kam Dhaliwal, Equality and Inclusion Manager	

## Summary

This paper provides your Board with the quarterly update on Equality and Inclusion related activities conducted by the Force since the previous report in April 2019. This report covers activity that has taken place and some information on future plans and actions of the City of London Police. The areas covered by this report are:-

**The Community Scrutiny Recruitment Campaign** -The Force has been focusing on the Community Scrutiny Group recruitment and promoting equality, diversity and inclusion in Force. New Community Scrutiny Group members have been recruited and they attended their induction day in June.

**The BAME Action Plan** –The BAME Action Plan is being led by the Force Race Champion and he is being supported by HR and the staff support networks. A draft was presented to the Performance and resource Management Committee on 21<sup>st</sup> June.

**Work Experience** - The Force is currently delivering work experience to support recruitment, promoting policing and attracting under-represented groups.

**The Independent Advisory Group** – The Superintendent of Uniformed Policing is working with the IAG on the best way to move forward and this is subject to a separate report on the agenda.

**Gender Pay Gap Data** – The force published their Gender Pay Gap Data in line with the legal requirements.

## Recommendation

It is recommended that this report be received and its content noted

## Main Report

### Background

1. 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 it provides an update since the last report to the Board.

### Equality and Inclusion Managers Update

2. **CoLP Website:** The Equality Report is due to be published at the end of June 2019.
3. **Royal Navy Diversity & Inclusion Conference:** A number of equality, diversity and inclusivity issues were discussed and information was given about how the armed forces are overcoming such issues. The event was attended by various armed force equality leads and champions.
4. **Zero Suicide Alliance:** The Force's Equality & Inclusion Manager (E&I Manager) attended the event which highlighted some of the areas in public service that needed to be reviewed. There were a number of opposing views on the language used to address suicide and the cultural impacts of suicide. Zero Suicide Alliance has a free 20 minute suicide prevention video that can be accessed on-line, 24 hours a day. The link has been shared with Learning & Development to assess if the video could be incorporated into Force training packages or link shared on the Force website.
5. **Cheshire Police Positive Action ET Case:** This case was brought against the force by a male (the claimant) who did not have any protected characteristics and was not successful in his application to be recruited as a Police Officer. It has received significant media coverage. The Employment Tribunal (ET) found in favour of the claimant, in that he had been discriminated against. The ET scrutinised the forces recruitment processes and markings. The ET found that the force had failed to mark all candidates consistently. The ET found

*138. The application of this selection procedure at the time was in the Tribunal's view premature without a full analysis of the impact of the measures that were already in place. Further there appeared at times a scattergun approach to the individuals with different protected characteristics. The Tribunal considers that the manner of the selection imposed what the Government Equalities Office had counselled against in that it was an artificially low threshold, imposing an artificially low threshold would not be a proportionate response to recruiting to address the issue of a lack of diversity balance.*

**139.** *In the circumstances the respondents have not demonstrated the justification for the discriminatory effect of the positive action they applied in this case. The respondents were required to consider first the bedding down of their previous positive action measures, secondly, to measurably assess the impact of those to potentially apply positive action to a smaller exercise in the first place, and to not impose artificially low thresholds in terms of a recruitment procedure, nor to completely ignore a qualitative assessment of candidates and then to re- introduce a merit based analysis in a later part of the recruitment.*

**140.** *In the circumstances the Tribunal concludes that the claimant would have succeeded in his application and been appointed as a Police Constable, had the respondent, not applied positive action at the interview stage having obtained and ignored qualitative data and where he was a relatively strong candidate and likely on our assessment to have been positioned on the right side of the number needed to fill the vacancies.*

**141.** *In the circumstances the claimant's claim in respect of direct discrimination succeeds'.*

6. The learning from this ET will be taken forward by HR via the Force's Organisational Learning Forum.

### **Community Scrutiny Group Recruitment Campaign**

7. The Force has established a new Community Scrutiny Group (CSG) with new members. The group is formed of 12 members (subject to successful vetting) who are reflective of the greater London population. All members were invited to attend an induction day on Tuesday 11<sup>th</sup> June. The induction meeting provided the CSG members with an understanding of police community scrutiny groups, training, Terms of Reference, Stop & Search, Use of Force, Spit Guards and Limb Restraints and police feedback. The CSG will now receive some high level training on policing matters to enable them to provide the force with constructive feedback. There is a separate report on your agenda referencing plans moving forward with the CSG and Independent Advisory Group (IAG).

### **BAME Action Plan**

8. At the last Equality & Inclusion Board the Forces Race Champion (who is of Chief Inspector rank), was given ownership for drafting a new BAME Action Plan for the Force. It was agreed, that the Head of Human Resources (HR) and the Organisational Development Manager would be contributing and consulted on this plan and that HR would be the strategic lead. A draft Plan has been developed and it is in the process of being circulated to relevant stakeholders for wider consultation, including the Staff Support Networks. Early feedback on the plan has already been received from key staff internally, including better identification of actual deliverables and outcomes. The Draft Plan was presented to your Police Performance and Resource Management Committee for information on 21<sup>st</sup> June 2019.

9. The Chief Inspector will continue to work closely with colleagues from HR and Organisational Development to develop and finalise the plan. The plan has been drafted and based on the National Police Chiefs' Council (NPCC) Workforce Representation, Attraction, Recruitment, Progression and Retention Toolkit 2018-25. With the additional working strand of 'development'. The draft plan was presented at the Force's Equality & Inclusion Board Meeting in June.

## **Work Experience**

10. It was agreed at the May 2018 Equality & Inclusion Board that the Force would reintroduce Work Experience. Work Experience is currently being managed and temporarily owned by the Equality & Inclusion Manager due to resourcing pressures in HR Services.
11. There have been 39 requests from students and others to conduct work experience in the Force. The students are from various backgrounds and some with protected characteristics. There are students scheduled to complete work experience over the following periods: Monday 1<sup>st</sup> July until Friday 5<sup>th</sup> July, Monday 8<sup>th</sup> July until Friday 12<sup>th</sup> July and Monday 15<sup>th</sup> July until Friday 19<sup>th</sup> July. The hours of attendance are 9am to 3pm. Students have to pass vetting to complete work experience with the Force. Work experience provides students with awareness of police activities. Sessions cover Fraud/ Economic Crime, Dogs and Mounted Unit, Scientific Support/ Forensics, visit to the Old Bailey, Counter Terrorism, Confidence building, CV writing, Cyber Crime and other police functions. Students are shown all the opportunities available in policing. The students are grouped together to facilitate management of the group which mitigates the impact on the Force's business as usual activities.
12. The Force is providing work placements in the IT Department for two BAME students from Westminster Kingsway College. Once completed, the work placements provide the students with credits which contribute to their Level 3 BTEC Computing.

## **Independent Advisory Group Update**

13. The Independent Advisory Group has recruited two new members in the last reporting period and received a number of presentations including an input on Transform. Superintendent Response and Operations has been co-ordinating and working with the current Chair to assess future arrangements, with on-going consultation with members of the group regarding the future of community scrutiny and advisory groups. This is subject of a separate report on your agenda.

## **Gender Pay Gap Data**

14. On the 30<sup>th</sup> March 2019, the Force published its Gender Pay Gap data. The data published on the Forces website is data for Police Officers only. Police civilians are employed by the City of London Corporation (CoL) and their data has been included in the CoLs results, in line with the regulations. The Forces



Police Officer results are below and the results for the CoL can be found using the following links.

- [UK Gov.UK Gender Pay Gap Reporting](#)
- [The City of London Corporation Gender Pay Gap report](#)

Police Gender pay gap			
Pay rates	Gender pay gap - the difference between women's pay and men's pay as a percentage of men's pay		
Mean hourly rate	2.6%		
Median hourly rate	0.4%		
Pay quartiles	Women	Men	Total
Proportion of women and men in the <b>upper quartile</b> (paid above the 75th percentile point)	19%	81%	100%
Proportion of women and men in the <b>upper middle quartile</b> (paid above the median and at or below the 75th percentile point)	23%	77%	100%
Proportion of women and men in the <b>lower middle quartile</b> (paid above the 25th percentile point and at or below the median)	16%	84%	100%
Proportion of women and men in the <b>lower quartile</b> (paid below the 25th percentile point)	37%	63%	100%
Bonus pay	Bonus Gender Pay Gap - the difference women's bonus and men's bonus as a % of men's bonus		
Mean bonus	23%		
Median bonus	0%		
Bonuses paid	Women	Men	
Who received bonus pay	1%	2%	

## Narrative analysis

15. Police Officers' pay is determined in accordance with rank, with no reference to gender. Female and male officers who undertake the same role, have the same length of service and work the same hours receive the same pay. Their terms and conditions are set nationally by the government based on recommendations from the independent Police Remuneration Review Body (PRRB) and are bound by police regulations.
16. At the City of London Police, 77% of officers are male and 23% are female, meaning every 1 in 4 Police Officers is female. Factors such as sickness, part-time working, maternity pay, paternity pay, over-time payments, length of service and unsocial hour's payment will impact on an individual's pay. Length of service also influences base pay rates in respect of the position on pay scales.

## Hourly wages pay gap

17. In the Force, **women earn £1** for every **£1** that men earn when comparing median hourly wages. Their median hourly wage is **0.4% lower** than men's. When comparing mean hourly wages, women's mean hourly wage is **2.6% lower** than men's.

## Proportion of women in each pay quarter

18. In the Force, women occupy **19%** of the highest paid jobs and **37%** of the lowest paid jobs.

## Bonus pay gap

19. In the Force, **women earn £1** for every **£1** that men earn when comparing median bonus pay. Their median bonus pay is **0% lower** than men's. When comparing mean bonus pay, women's mean bonus pay is **23% lower** than men's.

## Conclusion

20. The Force continues to work on Equality and Inclusion issues, with oversight through the E&I Board chaired by the Assistant Commissioner. Acting on the feedback from the external benchmarking exercises assists the Force to incorporate best practice into its processes. Regular reporting to your Board ensures that Members are informed and this area of business is subject to oversight and scrutiny.

## Contact:

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<b>Committee(s):</b> Police Authority Board	<b>Date:</b> 11 <sup>th</sup> July 2019
<b>Subject:</b> Special Interest Area Scheme 2019-20	<b>Public</b>
<b>Report of:</b> Town Clerk	<b>For Decision</b>
<b>Report author:</b> Alex Orme	

## Summary

This report sets out arrangements for the Police Committee Special Interest Area (SIA) Scheme for 2019/20 and requests Members to confirm appointments to each of the areas. The Scheme (attached at Appendix A) informs of key developments in each of the areas over the past year, highlighting where Member involvement has made a difference. It also gives an overview of the priorities for each special interest area over the next twelve months to assist the individual Lead Members to better scrutinise progress and measure success.

## Recommendations

It is recommended that-

- (a) the Special Interest Area Scheme 2019/20 (attached at Appendix A) be agreed, noting in particular:
  - (i) the achievements in the year 2018/19; and
  - (ii) the key priorities identified for the year 2019/20.
- (b) Lead Members be appointed for each area in the Scheme.

## Main Report

### Background

1. The Police Committee has operated a Specialist Interest Area (SIA) Scheme since 2007 in accordance with the terms set out in Appendix A (page 1). The purpose of the Scheme is for Members of the Committee to have oversight of specific areas of City of London Police work and gain expert knowledge and expertise, thus enhancing the Committee's scrutiny and performance management role.
2. The Scheme operates through a direct liaison between lead officers at Force and Members. A contact in the relevant area of business is tasked to make regular contact with their respective SIA Lead Members, keeping them informed of developments or issues which may arise throughout the year.
3. Lead Members are also expected to oversee the work that takes place, challenging and following up issues where necessary. Lead Members are encouraged to raise issues at the Grand Committee where appropriate to ensure

that appropriate action is taken. The objective of the Scheme is not to give an 'operational' role to Members; instead, it is intended to boost the support which the Police Authority Board provides to the Force in delivering outcomes.

### **Current Position**

4. Members have maintained a significant interest in their areas over the past year and the feedback received on the operation of the Scheme in 2018/19 was very positive. Members have good working relationships with their Force contacts and are developing greater technical knowledge and expertise in their respective areas as well as following up issues more closely. Key achievements for each of the areas have been highlighted in the respective reports of the Scheme attached at Appendix A.
5. As it is customary every year, Members are asked to review the operation of the Scheme to ensure that the areas are appropriate for the Committee's business. There is one recommended change for the 2019/20 Scheme – the removal of the SIA for Accommodation. The oversight and scrutiny functions are now performed by the Police Authority Accommodation Working Party and this forum ensures that the Police Authority Board has a greater understanding of the Police Accommodation Programme.
6. There will be a comprehensive review of the scheme in 2019/20 – the outcomes of which will be used to refresh the SIA scheme for 2020/21.

### **Consultees**

7. The lead officers of the City of London Police have been consulted in the preparation of this report and their comments are contained within.

### **Conclusion**

8. The Police Committee operates a Special Interest Area Scheme whereby one or more Lead Members are appointed to each of the various special interest areas. The Scheme aims to improve the Police Authority Board's scrutiny and performance management function. The purpose of the report is for the Board to agree arrangements of the Scheme for the ensuing year. The Scheme (attached at Appendix A) informs of key developments in each of the areas over the past year and gives an overview of the priorities the next twelve months to assist the individual Lead Members to better scrutinise progress and measure success.

### **Appendices**

*Appendix A – Special Interest Area Scheme 2019/20*

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City of London Police Authority Board

# **Special Interest Area Scheme**

2019/20

## **INTRODUCTION**

### **Aims & Objectives**

1. The objective of the SIA Scheme is to improve knowledge on the part of Members about key areas of national and local policing and essential activities of the City Police.
2. It operates by the Police Authority Board nominating one or more Lead Members to each of the various special interest areas. The Police Commissioner determines a 'Contact Officer' to act a liaison with each of the Lead Members.
3. The Scheme aims to improve the Police Authority Board's scrutiny function when making decisions on complex issues at each meeting. It is intended that Lead Members acquire the necessary expertise by being more actively appraised of key developments in their respective areas. The objective of the Scheme is not to give an operational role to Members in their respective areas or responsibility for delivery; instead, it is intended to boost the support which the Police Authority Board provides to the Force in delivering outcomes.
4. Preparation and publishing of the Policing Plan each year involves a significant element of local consultation, in which respect, Members are well placed to reflect the views of their electorates. In order, to assist in that process – and to make consultation into a two-way process, it is desirable for Members to be acquainted at first hand with how the force works, its problems, successes, etc. In this connection the SIA Scheme aims to assist both Members and the Force to deliver the level of policing service which the City community wishes to have but taking account of the constraints which may be placed upon the ability to provide that, e.g. financial.

### **How the Scheme will work**

5. Contact Officers are responsible for keeping Members appraised of developments and ensuring that they are reasonably involved in meetings/discussions where general strategic direction in each of the areas is being considered. Parties are requested to keep in touch on a reasonably regular basis – say, quarterly (more often if you wish or feel it to be necessary). It is quite possible that, as a result of these discussions, Members could put forward suggestions for improving the way in which certain things are done in the Force. Members' business/professional skills could be a real benefit. Both Members and Contact Officers are encouraged to speak freely to each other, keeping the Clerk to the Police Authority Board & the Police Authority informed where relevant.
6. Members are encouraged to keep the Police Authority Board informed of contacts made/information obtained/any potential problems, etc.
7. Any questions from Members about the SIA Scheme should be addressed to the Police Authority Board Clerk or the Police Authority.

## THE 2019/20 SCHEME

### Proposed changes

8. The areas below take account of the priorities for 2018/19 in terms of policing activity and are designed to distribute the Board's workload more evenly amongst Members.

Areas	Recommendation
Business Improvement, Performance & Risk Management	To continue and retain the alignment with the Chairmanship of Performance and Resource Management Sub-Committee This role will cover oversight of the delivery of the COLP Corporate Plan and the Force's Commercial projects
Strategic Policing Requirement Overview	To continue
Professional Standards and Integrity (& Human Resources)	To continue and remain twinned with the Chairmanship of Professional Standards and Integrity
Equality, Diversity & Human Rights	To continue
Counter Terrorism	To continue
Economic Crime and Fraud (& Cyber Security)	To continue and remain twinned with the Chairmanship of the Economic Crime Board
Accommodation	To discontinue. The oversight and scrutiny function are now performed by the Police Accommodation Working Party
Community Engagement & ASB	To continue
Public Order	To continue
Road Safety (& Casualty Reduction)	To continue
Safeguarding & Public Protection (Vulnerability & ICV Scheme)	To continue.

Business Improvement, Performance & Risk Management	
Lead Member for 2018/19	Deputy James Thomson/Andrew Lentin (Risk)
Officer contact	Stuart Phoenix, Head of Strategic Development 0207 601 2213

## Business Improvement

Implementing the recommendations made by Her Majesty's Inspector of Constabulary, Fire and Rescue Services (HMICFRS) remains a key component of business improvement. In common with recent years, 2018/19 has been a full year from an HMICFRS perspective, detailed below. The Police Authority Board Lead, Deputy James Thomson continues to play a key role in the refinement of Force processes relating to this area.

All HMICFRS report findings and recommendations made over the year continue to be entered onto a Force database, where the actions necessary for their implementation are also recorded. That information forms the basis of reports to Performance Management Group and quarterly reports to the Police Performance and Resource Management Sub Committee. Deputy Thomson and other Members on the Performance and Resource Management Sub Committee have provided valuable challenge and scrutiny in the areas reported on, and have played an important role in representing the Police Authority in meetings with HMICFRS where they have balanced championing the Force in numerous areas whilst providing reassurance to HMICFRS of the independent oversight provided.

During 2018/19 the Force was inspected under the new 'Integrated PEEL Assessment' (IPA) process, which has replaced the separate Efficiency, Effective and Legitimacy inspections, even though each of those areas continue to be assessed within the IPA. Additionally, the Force underwent an unannounced Custody inspection, an inspection of the Policing Response to Fraud and an unannounced inspection of Crime Data Integrity.

Preparations for these inspections and the Force's response to previous ones has resulted in a number of business improvements, including a new Force Resolution Centre (improving the efficiency with which crimes are recorded which benefits victims of crime), improving the provision of custody services in Force, and formation of a lifetime offender management team.

The Force continues to refine its approach to preparing for and responding to HMICFRS inspections. This will principally be through conducting more robust self-assessments, to include peer reviews, more 'reality testing' and incorporating more learning from those forces HMICFRS deem to be 'outstanding'. This will enable the Force to be more proactive in implementing best practice before an inspection rather than simply reacting to findings.

## Performance Management

As with Business Improvement, Deputy Thomson has been a key individual in shaping how the Force reports on its delivery of Policing Plan Priorities for 2018/19.

Performance against those measures is reported to Performance Management Group, chaired by the Assistant Commissioner and of which Deputy Thomson is a member. Performance is thereafter reported quarterly to the Performance and Resource Management Sub Committee, whose challenge and scrutiny role helps to ensure Force measures remain effective; their role can and does directly impact on policing activity.



The introduction of NICHE, which included the migration of data from the various systems it replaced, did result in some early issues with the availability of data. This has been addressed so that the Force and Members can be assured performance data is robust.

The Force will continue to refine its approach to reporting performance so that it meets the needs of the Sub Committee, and evidences more effectively the impact its activities are having on areas of criminality.

#### **Risk Management:**

Over the past year the Force has continued to develop its Risk Management processes. Oversight of the Force Risk Management Process is maintained through bi-annual meetings with the Assistant Commissioner to review the content of the Force Strategic Risk Register and ensure that the Force risk process is providing information to meet the needs of the Force and Members. The Force Risk Register is submitted to Police Committee for oversight and to provide information on the current status of the Force risk profile.

Andrew Lentin is the Lead Member for risk providing scrutiny to the risk assessment process, ensuring it is robust and the risk scoring can be justified. Minutes of the quarterly Risk & Business Continuity meeting are provided to the Lead Member prior to his meeting with the Assistant Commissioner so that he is aware of the full discussion around Force risks and is able to question information contained within the register. At the Risk & Business Continuity Group the Assistant Commissioner challenges risk scorings and assumptions made by risk owners to ensure that the risk register reflects a true and accurate position. This provides confidence that the risk position reported to Senior Managers and Committee reflects the actions being undertaken and allows the Assistant Commissioner to effectively brief the Committee Risk Lead as part of their one to one meeting agenda.

The Force risk process is very well evolved, and continues to develop utilising feedback from end users as well as advice given by members on how risks should be presented for discussion at Committee.

## Strategic Policing Requirement Overview

<b>Lead Member for 2018/19</b>	Deputy Henry Pollard
<b>Officer contact</b>	Stuart Phoenix, Head of Strategic Development 0207 601 223

### Background

The Strategic Policing Requirement (SPR) is now in its seventh year of operation. It was introduced in 2012 to articulate those threats that in the Home Secretary's view are so serious and transcend force boundaries that they require a coordinated regional or national response. The national threats articulated in the SPR remain Counter Terrorism, Serious and Organised Crime, Public Order, Civil Emergencies, Large Scale Cyber Attacks and Child Sexual Abuse, which was added in 2014/15. Police and Crime Commissioners and Chief Constables are required to have regard to these threats developing their plans and ensure they have the capacity, capability, connectivity and consistency to contribute to countering the threats.

### 2018/19

As last year, an element of HMICFRS's Integrated PEEL Assessment included assessing the extent to which the Force was meeting its obligations to support the SPR, with a continued specific focus on protective services. The SPR has become 'business as usual' to such an extent (it is an intrinsic element of the Strategic Threat and Risk Assessment (STRA) and features prominently in the Policing Plan priorities) that HMICFRS found the Force has good specialist capabilities and effective arrangements in place to ensure it can fulfil its national responsibilities. This area is not graded due to the sensitive nature of the area being assessed and HMICFRS not wanting to place vulnerabilities in this area in the public arena. If HMICFRS had any issues with specific concerns around a force's ability to fulfil its obligations in this area, they undertook to write to the Chief Constable and Police and Crime Commissioner to detail those issues. City of London Police has not received any such letter. None of the areas for further improvement cited in the report relate to SPR areas.

City of London Police's commitment to supporting the SPR has been retained in the revised policing plan (2017-2020), which has been updated for the 2019/20 financial year.

Deputy Pollard has met with the Head of Strategic Development to review the work that has been completed to ensure the Force continues to fulfil its SPR obligations.

### 2019/20

It is likely that the SPR will continue to feature in the Integrated PEEL Inspection under the guise of 'specialist capabilities'. It will also continue to feature prominently in the Force's Strategic Threat and Risk Assessment (STRA).

The national agenda for specialist capabilities, and the role played by individual forces in the delivery of those specialist capabilities is still being scoped by the National Police Chiefs' Council.

## Professional Standards, Integrity and Human Resources

<b>Lead Member for 2018/19</b>	Alderman Alison Gowman
<b>Officer contact</b>	D/Supt. Maria Woodall, Head of PSD 020 7601 2203 HR Director, Julia Perera 020 7601 2230 Head of Strategic Development, Stuart Phoenix 0207 601 2213

Alderman Gowman (Chairman) and Members of the Professional Standards and Integrity Sub-Committee continue to provide independent oversight of the Force's Public Complaints and other Professional Standards (PSD) business through the Sub-Committee. The Sub-Committee is represented at the PSD Working Group by the Town Clerk's Policy & Project Officer and Alderman Gowman and the Policy & Project Officer attend the Integrity Standards Board. Both of these meetings feed into the Organisational Learning Forum as the strategic meeting for force-wide learning.

Alderman Gowman and Sub Committee members have continued to drive improvement of the PSD reporting documents following the recommendations of their review. The Chairman and the members have been consistent in their challenge and scrutiny of PSD investigation standards and the PSD quarterly report to the Sub-Committee. They provide independence and objectivity, ensuring that PSD investigations are open, fair and proportionate.

Members have taken an active interest in the Civil Claims element of Professional Standards and continue to provide support in this area.

The Chairman is conscious of the current trends within the area of Professional Standards and considers issues that may affect PSD investigations, such as property, sponsorship and gifts & hospitality.

The Professional Standards Directorate has continued to experience changes to its personnel this year, which has impacted continuity, experience and corporate memory.

PSD continues to actively support the COLP Leadership Development Programme which seeks to empower and enable creative leaders and develop staff. Within the department there are Leadership Coaches and Facilitators.

PSD actively supports the education of colleagues in respect of standards. Staff from the Complaints and Misconduct Team deliver presentations on all induction courses. Presentations have also been delivered to custody sergeants, uniformed groups, the Special Constabulary and the Police Volunteer Cadets.

The College of Policing, again, held the Heads of 'Professional Standards and Appropriate Authority Development Course'. This course ensures that CoLP PSD decision makers are professionally trained to the highest standard currently available from the College of Policing. This year it was attended by the Head of PSD. Currently all PSD senior managers have received this training which ensures consistency in the application of the Regulations, Guidance and relevant legislation.

PSD sent three delegates to the Professional Standards & Ethics Conference 2018 at Stratford-upon-Avon. The conference provided an update by the Home Office for implementation of the 2nd and 3rd Phases of the Policing and Crime Act 2017. The importance of the Code of Ethics was re-emphasised and 'Practice requiring improvement' was clearly positioned to support the move to a performance and learning culture. The NPCC, Home Office and IOPC advocate a change in working practises to reflect the proposed Regulations and legislation in advance their formal introduction

which we have embraced; there is even greater emphasis on learning outcomes and openness where possible.

Following on from the PSD Team Strategy Day in March 2018, an action plan to guide PSD going forwards was drawn up with emphasis on communication which reflect the change in culture, with aim of making PSD more approachable. The quarterly 'Professional Bulletin' promulgates national and local learning in an effort to educate members of the force, improve the standard of service given and reduce complaints and misconduct allegations. PSD has a rolling programme of 'surgeries' to provide staff with the opportunity to engage with PSD investigators in their own workplaces.

Two-way confidential reporting has been in place in the Force for almost 2 years. Its success has placed increased demand on the Counter Corruption Unit (CCU). To date 85 matters have been raised using the system, each of these has required some level of attention or investigation.

PSD and Human Resources (HR) meet monthly to discuss the outcomes of misconduct proceedings to ensure parity between police officers and police staff.

Key Issues for 2019/20:

- Although delayed from summer 2018, PSD is prepared for a move to New Street accommodation this year. The new accommodation includes the facility to hold misconduct meetings which has been put to good use already. Once the move has taken place this facility will be opened up to other forces for use, providing a hitherto unavailable revenue stream.
- The current structure and working practises of PSD are under review through the Transform Programme, ensuring that PSD continues to be efficient and effective as the force modernises its services to deliver the Corporate Plan. PSD is engaged with the Transform Programme through the Investigation Strand (Complaint and Conduct Investigations & Counter Corruption) and the Support and Enabling Strand (service recovery and less serious complaints, Vetting & Civil Claims/Legal Services).
- The HMICFRS PEEL 2018/19 inspection highlighted areas of improvement for the Counter Corruption Unit (CCU). The anti-corruption strategic assessment and control strategy required updating, which has now been done. The inspection also highlighted insufficient capability and capacity in the CCU due to the low level of staffing and an inability to effectively monitor IT systems.

PSD is working towards an alliance between the counter-corruption efforts of the British Transport Police and CoLP to increase the capability and capacity of both units at neutral cost. BTP officers are now co-located with our CCU. The concept has received the approval of the Transform Programme Board.

PSD is working with IT and Information Management to increase the capability of system monitoring. We aim to implement a solution this year.

- We are proactively working with the IOPC and Home Office, along with the Town Clerks in preparation of Phase 3 of the Policing and Crime Act 2017 and the new regulations and Statutory Guidance.
- The reform of the police complaints and disciplinary systems is expected to move the focus of the regime from one of 'blame and sanction' to one of 'learning and improvement'. PSD will continue working with colleagues to bring about this cultural change, supporting the Force in delivering an exceptional policing service.
- Policing and Crime Act 2017— The Force does not envisage the final changes under the Act to be implemented until autumn 2019. Force Appeals will move to the Common Council. The

Town Clerk's Office and PSD Appeals Officer continue to work together to prepare for the changes which will be set out in the IOPC's forthcoming Statutory Guidance.

The full impact of the changes to the recording of complaints or dissatisfaction will be considered when the detail is available in Statutory Guidance. However, it is anticipated that there will be an increased burden on both the Force and the Local Authority (The Common Council) as all expressions of dissatisfaction will need to be recorded even if the Force decides to take no action (currently such matters are not formally recorded). An appeal against a decision to take no action would have to be considered by the Local Authority.

It has been identified that there will be a significant impact on how complaints, currently being handled by Action Fraud under their complaints policy, are recorded and dealt with in future. PSD is already seeing an increase in demand for resolution of Action Fraud issues outside the policy which is being addressed with the Economic Crime Directorate in the short term and the Force Transform Programme in the mid to long term.

- In 2019 the Force will be holding Misconduct Hearings for two significant cases which were investigated independently by the IOPC. They are likely to attract media attention.
- Vetting is fully compliant with the new College of Policing Authorised Professional Practice (APP) for Vetting and the Vetting Code of Practice. However, it was recognised nationally that there are still some challenges to aspects of the APP which vetting have been monitoring and engaging in where appropriate and we are preparing for implementation of an updated APP which is expected in 2019.
- There continues to be a high demand on vetting from the recruitment of officers and staff. A number of changes and developments within the force have also increased the demand in the vetting of contractors to support the accommodation and Know Fraud programmes. This is expected to continue with the proposed development of the Fleet Street HQ. Vetting have been working with stakeholders to obtain funded contingencies to maintain service levels which will be implemented as required.

In addition to this, Action Fraud have a continued demand for staff at their call centre. This is managed with supported with funding from Action Fraud.

- PSD is recruiting new staff to fill current vacancies. This will have an inevitable impact on continuity and relevant expertise in dealing with Misconduct, Complaints, Counter Corruption and Vetting as well as the provision of administrative support. The PSD annual report for the COLP STRA process enables the Director to highlight areas in which demand exceeds existing resource capacity.
- Following the success of the quarterly Professionalism Bulletin and our Strategy Day, PSD is continuing to work with Corporate Communications to break down communication barriers and increase the department's visibility and approachability. Corporate Communications have allocated a member of staff as the single point of contact for this work. A further Strategy Day is planned for May 2020, to which the Town Clerk's Policy & Project Officer and members of the Professional Standards and Integrity sub-committee will be invited

## Equality, Diversity and Human Rights (EDHR)

### Lead Member for 2018/19

Tijs Broeke

### Officer contact

Kam Dhaliwal Equality & Inclusion Manager 0207 164 8212

## Overview 2018/2019

The year ahead was planned to embed equality and inclusion in the forces culture and processes. Kam Dhaliwal was appointed as the Equality & Inclusion Manager in January 2018 and she has reviewed how the force engages with its community, represents the diversity of greater London and the diversity of the workforce. Community surveys, documents, reports and direct community engagement have been used to gain a better understanding of the community and its policing needs. Staff surveys, equality data and staff feedback will be used to understand how we can make the Force more efficient, effective, agile and future-ready for the Transform change Programme.

## Our Force

The current establishment of the City of London Police allows for 728 officers and 468 staff, and we currently employ 693 officers and 456 staff. Approximately a quarter of our officers and 58% of our staff are female, whilst 6% of our officers and at least 20% of our staff come from a BAME background. 140 officers are eligible to retire over the next 4 years, and we anticipate that the vast majority will take up this option. Due to retirements, resignation and other reasons, the turnover rate for police officers is historically approximately 8%, with the economic crime directorate suffering the most from voluntary resignations by officers.

Lucy Sandford stepped down as the Police Committee representative, due to moving to a new role and Tijs Broeke replaced her during the spring 2018. Tijs's background in equality, diversity and human rights, has been invaluable support to the role. The engagement and support received has empowered the force to move forward with representing diversity in all areas of our work.

- The Equality & Inclusion Board was re-introduced in May and quarterly meetings have been taking place. The Equality & Inclusion Forum was set up to provide all the staff support networks and Trade Union Representatives an opportunity to identify any equality issues that cross over and to collectively strategize on how they wish the force to address the issues. The actions are directly fed into the Equality & Inclusion Board for a decision.
- The force has joined Employers Network for Equality & Inclusion (ENEI) membership which provides business with tools, training, legislation, policies and guides on equality, diversity and inclusiveness in the workplace.
- Work experience was re-introduced as part of the forces positive action. A number of students have undertaken work experience with the force. The Force have arranged work experience for two Black, Asian, Minority Ethnic (BAME) students from Westminster Kingsway College, who have been completing the work placement within the Forces IT department. These placements are one day a week until July 2019. Once completed, the work placements provide the students with credits which contribute to their Level 3 BTEC qualification.
- The Equality & Inclusion Manager has been attending all PAPA & NPCC meetings. She has been engaging with other police forces, public sector organisations, and private sector organisations, to help bring any organisational learning into the force.

- The Equality & Inclusion Manager has been working with Common Purpose, which is an organisation that networks with private and public sector organisations on the best practice for Equality, Inclusion and Diversity (EDI). The events allow EDI specialist to come together and collectively resolve EDI issues in businesses and organisations.
- The force published its Gender Pay Gap Data which reflected a small difference when compared to the previous year's data.
- The force will continue to ensure the publicly available data on the website is kept up to date in a timely manner.
- Kam has been actively engaging with community groups from the City and from around the City to help with our community engagement.
- The Women's network have paid for female empowerment courses and developmental courses. They will look at implementing mentoring programmes, job shadowing and changing the wording of recruitment campaigns to encourage more applications from females and the LGBT community. The LGBT Network has been providing education and training on Transgender people. Transgender training is now part of the Custody Management training course.
- Disability Enabling Network is working on an Autism Card that will allow officers and front-line staff to communicate with people who are autistic. The Autism Card is currently being reviewed by the Metropolitan Police and British Transport Police. The Health & Well-being Network have promoted well-being sessions about healthy eating, how to give up smoking and managing difficult sleep.
- Black Police Association (BPA) and Association of Muslim Police (AMP) have focused on progression, recruitment and retention of BAME staff and officers. They will create a mentoring programme for BAME staff and officers to progress and develop themselves. They have previously delivered mentoring, training and self-development courses. They will attend the Community Scrutiny Group meetings to build on community engagement with the BAME community.
- BAME Action Plan is being led by the force Race Champion who has been working very closely with the Black Police Association, the Head of HR and the Head of Organisational Learning.
- The force are re-establishing the Community Scrutiny Group with a press campaign to recruit new members from business, residential and transient population. This area has been raised as area of concern during our HMIC Inspections.
- The force's dashboards have been revised to reflect the equality data of the people they encounter during policing practices such as, stop & search, use of force, vulnerability etc.
- Stop & Search training was revised to include unconscious bias training to educate officers on the cultural impact of their actions and to help improve the quality of our report writing.
- NPCC Equality Plan was created by Police Force Equality leads from around the UK and was introduced in 2018. The force has populated this document with all of its activities, which will be used by HMIC during inspections.

### **Transform Programme**

To help embed equality and inclusion into the force, all directorate leads will be provided with their directorate equality data and they will be asked to provide some feedback. They will be trained on cultural & emotional intelligence and the operational benefits of diversity in the workforce. Once trained, they will be provided with the tools and support, to diversifying their workforce.

## Counter-terrorism

<b>Lead Member for 2018/19</b>	Deputy James Thomson
<b>Officer contact</b>	Detective Superintendent Dermont Robinson, Crime Directorate

CoLP Special Branch (SB) continues to lead on the collation and development of intelligence related to terrorism and domestic extremism and to investigate all instances of potential terrorist activity in the City. Counter Terrorist Security Advisors (CTSA) continue to provide expert security advice to enhance the protective security of the City.

During 2018 no confirmed terrorist attacks occurred within the UK, however several high profile terror arrests and convictions were made. Incidents attributed to individuals with mental health conditions who claim ideological influence are hard to distinguish from attacks conducted by inspired lone actors and continue to be assessed on a case by case basis, as evidenced by the Manchester Victoria train station attack at the end of 2018 and which resulted a man being detained under Mental Health Act provisions.

The threat to the UK from International Terrorism is currently Severe, meaning an attack is highly likely. It has remained at this level since September 2017 following a rise to Critical subsequent to the Parson Green tube attack.

In March 2018 SB fully adopted the NCIA (National Common Intelligence Application). This involved extensive training and new ways of working for the department. NCIA enables Special Branch to share and receive intelligence from the entire CT (Counter Terrorism) Network more efficiently, enabling an enhanced understanding of the national picture and how that may affect the City of London.

CoLP is well integrated into National and London structures and COLP SB attended all scheduled and extraordinary Security Review Committee (SRC) meetings throughout 2018 and 2019 to date. These meetings, led by the MPS and National CT leads, comprise national membership and take place at least fortnightly. Information from these meetings are filtered within CoLP through fortnightly Security Group Meetings, thus ensuring coordinated police deployments and appropriate information sharing.

During 2018-19 the SB Fixed Intelligence Management Unit (FIMU) received 3917 separate items, as the single point of entry into CoLP for all Counter Terrorism/Domestic Extremism matters. 261 of these were further developed into intelligence or investigations. These come from a range of sources and include intelligence received from the other police forces, the security services or the general public, referrals from other police departments around their ongoing investigations, reports of hostile reconnaissance, threat assessments and anything that is deemed to be CT/DE relevant.

SB continues to monitor the threat from Northern Ireland Related Terrorism. The threat level to the UK mainland was raised to substantial in September 2016 and lowered to moderate on 1<sup>st</sup> March 2018, where it has subsequently remained. This means an attack is possible but not likely, reflecting the view that the intent to commit attacks on the mainland remains. The only incident on the UK mainland over the last 12 months related to the postal IEDs sent to Glasgow University, Heathrow, Waterloo and London City airport in March 2019.

122 Operation Lightning reports (potential hostile reconnaissance) were received and investigated during 2018; a decrease of 46% on 2017 and the lowest level since 2014. No investigations are outstanding; all have been investigated fully. Although the levels of reporting appear relatively low,



this is compared to the exceptionally high levels of reporting witnessed in 2017 which correlated with the terror attacks that took place in the UK during that period. Levels of reporting during the first two months of 2019 appear to be on a par to that experienced in 2018. Reporting peaked in the summer months of 2018 (June – August), whilst higher numbers of reports were submitted by security personnel (x 58) and members of the public (x 51).

Detailed threat assessments have been compiled for all high profile events and state visits in the City. This assists in informing the policing plan for each and allowing a proportionate and effective response. In total 124 threat assessments have been completed including events such as Lord Mayor's Show, the memorial event at St Paul's Cathedral for victims of the 2017 terror attacks, the visit of the King and Queen of Netherlands, the London Marathon, Remembrance Sunday events and other large-scale public events.

## **Prevent**

The CoLP Prevent team received 9 Prevent Referrals during 2018. All had passed through the de-confliction process, within SB, before being passed to the Prevent team for inclusion on the national Prevent tracker.

The CoLP prevent website is active. We receive a relatively low number of referrals and our focus is on training and raising awareness within the business community to ensure that they are aware of how and under what circumstances to make a referral.

CoLP works closely with the Islamic women's group on Mansell Street, meeting on a weekly basis. We are a member of the safeguarding forum held by the City of London Corporation (CoLC) which all school safeguarding leads attend. CoLP is represented on the CoLC higher education and further education forums and liaises closely with the Higher and Further Education Prevent Coordinator as part of a recently created initiative. These are all valuable networks.

The CoLP Prevent team continues to share information with Business networks in the city to ensure an awareness of training provided by CoLP and of issues associated with people who may be vulnerable. The latter is provided in conjunction with Victim Support. The Prevent team provides presentations to hotel staff and construction sites, inductions for new staff into CoLP and Prevent inputs are ongoing for CoLC apprentices.

Workshop Raising Awareness of Prevent (WRAP) is a two and a half hour training package aimed at providing an overview of the Prevent strategy and highlighting ways of identifying those who may be vulnerable to radicalisation as well as those who radicalise. Recognising the challenges that businesses face in releasing their staff, CoLP has created a shorter version lasting one hour to encourage more business to take up the training. We conduct regular stalls at different City businesses and in shopping areas.

## **Project Servator**

Project Servator officers continue to have excellent results, making 82 arrests in 2018 and operating on a 74% stop search to outcome rate, which far exceeds the national average of less than 15%. Project Servator teams continue to work collaboratively with other forces on regular joint deployments; CoLP assisted Thames Valley Police on both of last year's Royal weddings and we continue to offer our expertise on cross boarder operations.

The National Project Servator Team (NPST) continues to train and develop other forces in Project Servator and has recently instigated a quality assurance programme to ensure forces are operating effectively across all strands to achieve the desired outcomes. The NPST is shortly to commence training officers from New South Wales Police in Australia for the first international pilot and is also taking over delivery of the trainer programme for See, Check and Notify (SCaN), a suite of courses designed for private industry.

The following forces have been trained by the NPST and have adopted Project Servator;

- City of London Police
- British Transport Police
- Essex Police
- Police Scotland
- Ministry of Defence Police
- Civil Nuclear Constabulary
- North Yorkshire Police
- Metropolitan Police Service
- Royal Gibraltar Police
- Greater Manchester Police
- Avon and Somerset
- West Midlands Police
- Bedfordshire Police
- Merseyside Police
- West Yorkshire Police
- Sussex Police at Gatwick airport
- Police Service of Northern Ireland

The NPST is supporting a number of other forces to introduce Project Servator;

- Greater Manchester Police, with an expansion of Project Servator into Manchester City centre. A formal launch is planned for May 2019
- West Midlands Police, focusing on sites hosting the 2022 Commonwealth Games.
- Police Scotland at Glasgow, Glasgow Prestwick, Aberdeen and Edinburgh airports. It is anticipated that these will be launched in the early summer of 2019
- Sussex Police as part of the preparation for the Labour Party Conference in Brighton in September 2019
- Merseyside Police at Liverpool John Lennon Airport.
- West Yorkshire Police at Leeds Bradford Airport.

The NPST is working with further forces to trial Project Servator in specific areas during 2019;

- Belfast Harbour Police with a pilot site at the Titanic exhibition in Belfast planned for the Summer
- Cheshire Police in Chester city centre commencing in June
- Devon & Cornwall Police with a test site at a Plymouth shopping centre planned for July
- Staffordshire Police commencing test at the Potteries shopping centre in Stoke in July
- Norfolk Police at the Chapelfield shopping centre in Norwich planned for August
- East Midlands Alliance (Nottinghamshire, Leicestershire & Derbyshire) commencing at East Midlands Airport in September

Forces that have shown an interest and have received initial briefing documents include;–

- Surrey Police
- North Wales Police
- Dorset Police
- Suffolk Police
- West Mercia Police
- Northamptonshire Police
- Hertfordshire Police
- Derbyshire Police

Forces that are either awaiting a briefing or are drawing up their plans for adopting Project Servator include;

- Thames Valley Police and Hampshire Constabulary in a potential collaboration
- Lancashire Police
- Lincolnshire Police
- South Wales Police
- Warwickshire Police
- Dover Ports Police

### **Counter Terrorism Security Advisors (CTSA)**

Although no major attacks took place on mainland UK during this past year the CTSA team continues to ensure the high demand in the City of London for protective security advice is met. The team comprises an Inspector, Sergeant and a team of five. There is a current vacancy for a constable which is hoped to be filled over the next few months. At this point the team will be fully up to strength. Staff are completing and continuing with accreditation.

CTSAs continue to support our business community maintaining an excellent reputation delivering against all priorities set by the National Counter Terrorism Security Office (NaCTSO). The CTSA team has been integral in the consultation process for Corporation of London (CoL) public realm sites and new developments. Notable of these include improvements around St Pauls' Cathedral and Paternoster Square, St Mary Axe, Aldgate, Millennium Bridge and Monument areas as well as ongoing work with key CoL sites.

The CTSA team also continues to deliver 'business as usual' requirements including all elements of the Action Counters Terrorism (ACT) campaign as well as bespoke training and awareness sessions to meet the needs of City of London partners. Also during this period, we have developed the ability to deliver postal awareness, document handling awareness sessions as well as the new 'See Check and Notify' (SCaN) products where training is given to sites on how to best understand and identify hostile reconnaissance. This product is a brand new CPNI developed initiative. The CoLP CTSA Sergeant is responsible for the national co-ordination of courses and delivery in partnership with 'NaCTSO'.

During the past year the CTSA team has delivered;

- 1,460 Act Awareness sessions. These are three hour long courses delivered to industry
- 461 Project Argus sessions. A three hour exercise to test preparedness for a terrorist

- attack.
- 192 Document Awareness sessions. These raise awareness of the use of false documentation by extremists.
- 162 Postal threat awareness sessions. These raise awareness of and test postal screening and security protocols.
- 2,418 General Threat & CT presentations.

The CTSA team continues to advise business on security improvements and work with our tiered Protective Security Improvement Activity (PSIA)<sup>1</sup> sites as set by the Office for Security & Counter Terrorism (OSCT) within the Home Office as well as our Critical National Infrastructure (CNI) sites

### **City of London Anti-Terrorism Traffic Regulation Order (ATTRO)**

Since November 2016, the CoLC, CoLP and Transport for London have had an Anti-Terrorist Traffic Regulation Order (ATTRO) which can be used in urgent cases and for certain pre-planned events within the City of London's boundaries. During 2018 a number of ATTROs were implemented for large one off events which have required road closures to ensure the safety of participants and crowds attending the event, such as Lord Mayor's Show, London Marathon and other road races.

### **Looking ahead**

The terrorist threat to the UK is becoming more diverse and multi-dimensional with a growing threat from right wing extremism and this is likely to continue throughout 2019. The recent attack in Christchurch is an example of what the rise in extreme right wing ideologies can lead to. Although not linked to the UK, the Christchurch attack could inspire or encourage others with a similar mind-set to carry out attacks in the UK or to increase Hate Crimes aimed at faith groups. There is also the potential for reprisal attacks from Islamist extremists and a general rise in community tensions.

The outcome of Brexit negotiations will undoubtedly impact upon future levels of left wing / right wing protest activity. National processes are in place for collation and dissemination of intelligence and are continually monitored by CoLP SB for likely impact upon the City.

Dissident Irish Republican groups such as the New IRA regard the EU exit as an opportunity to enhance their levels of credibility and support. If a 'no deal' and hard border is to be imposed it is anticipated that the threat from Northern Irish related terrorism will increase with Dissident Republican groups attempting to re-engage with and garner support from republican communities

Lone actors inspired by ISIL will continue to remain the greatest threat to the UK. Returnees from Syria, and those still looking to return to the UK, are also deemed to pose a long-term security threat due to the training some will have received in theatre and the mind set they hold which led them to travel to Syria.

The need for a 'whole society' response to countering extremism will become more important and our joined-up approach with industry and the CoL business community will become even more important.

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<sup>1</sup> The PSI is the mechanism used to ensure a consistent, national and auditable approach to the security of crowded places.

Terrorism remains a real and consistent threat to the City of London. The most recent Strategic Threat & Risk Assessment highlighted a need for additional resources to counter this threat. A recent submission to the Police Committee (April 2019) quantified the requirement for additional resources to tackle the terrorist threat through enhanced firearms capability (15 posts) and protective services (30 Project Servator posts). Without this CoLP may not be able to meet fully the threats and risks facing the City of London.

#### **Police Authority Board Support**

The Head of Counter Terrorism for CoLP meets with the Lead Police Authority Board Member, Deputy Thomson, regularly. We are grateful for Deputy Thomson's interest and support.

Economic Crime / Fraud / Cyber Crime	
Lead Member for 2018/19	Nick Bensted-Smith
Officer contact	Commander Karen Baxter 0207 699 4781

### Developments in 2018/19

Economic crime is now a government priority. A new governance structure has been established which is jointly chaired by the Home Secretary and Chancellor and aims to bring together fiscal policy with crime and security. New governance structures include the private sector and it is the government's ambition to have a new economic crime strategy jointly owned by the public and private sectors. COLP represents policing within these structures.

The new multi-agency National Economic Crime Centre (NECC) was launched in October 2018 to tackle serious and organised economic crime. COLP was part of the multi-agency design team and represents policing on NECC governance boards. COLP has seconded 3 FTE into the NECC as part of a match funding package developed by the Home Office.

There continues to be substantial government and parliamentary attention on the effectiveness of the police response to fraud. COLP chief officers gave evidence at the Treasury Select Committee inquiry into consumer fraud. The Remembrancer's office provided support for the preparation of written and verbal evidence related to this inquiry. The Police Foundation (independent think tank) published a report on online fraud and HMICFRS undertook a thematic inspection. These reports highlight some progress has been made but broadly the police response is very inconsistent, there is a lack of national coordination and non-vulnerable victims are not getting an effective service.

The new IBM managed service for national fraud and cyber reporting went live. The new system resulted in an initial reduction in reporting and dissemination. Since then reporting has increased and there remain some key issues in respect of functionality. Corporation and Members are providing vital support for the programme and assistance with legal and commercial issues that have arisen during the year. Additional funding was secured to develop an API between NFIB and force record management systems and an API to facilitate bulk reporting from industry. These projects will continue in 2019/20.

COLP secured police transformation funding for the Economic Crime Academy to provide serious fraud training to over 600 officers nationwide. Members and the Corporation continue to raise the external profile and international reach of the Academy. Police transformation funding has also been used to create a regional network to support NLF priorities and provide a conduit for engagement with forces, and a pilot direct entry programme for fraud investigation have also been established.

Additional funding was secured from the National Cyber Security Programme, and the Economic Crime Victim Care Unit (ECVCU) model has been rolled out in West Midlands and Greater Manchester. The ECVCU model was developed in London with funding and support from MOPAC and the Town Clerk's department.

Throughout the year COLP received a number of ministerial visits to its Economic Crime Directorate, which were supported and/or facilitated by Members.

Action Fraud maintains a role as the national reporting centre for cyber crime as well as the national lead role for Cyber Protect. Project Fortis, which is being led by the National Cyber Security Centre (NCSC), is a new IT solution that will bring together all reports of cyber across the range of agencies. While Action Fraud receives the bulk of reports, the NCSC receives some calls for service and there are different approaches depending on the level of attack. COLP is represented on the Project Fortis governance board.

National funding has been awarded to enhance force cyber capabilities and drive a regionally managed locally delivered model. COLP has been successful in bidding for funds for equipment, and entered into agreed tasking and coordinating processes with regional partners. COLP supports the London regional delivery through two fully funded secondments.

A local strategy has been adopted to engage the community through innovative protect offerings. This has been funded by the Corporation of London under Cyber Griffin. The demand for these services has been high, and the marketing of these services internationally has been well received, indicating this is a compelling aspect of the City of London offering.

#### **Priorities for 2019/20**

- Maintain COLP's position, reputation and funding as the national police lead for economic crime
- Implement recommendations from the HMIC thematic review
- Improve the Action Fraud / NFIB service, demonstrating the benefit and value of the service to Police & Crime Commissioners, Chief Constables and other government stakeholders
- Work collaboratively with the National Economic Crime Centre to reduce the threat and harm from serious and organised fraud
- Consolidate Cyber Griffin, developing the products, staff and branding to drive a positive cycle of awareness, engagement, reporting and self-protection
- Contribute to the design of Project Fortis

Accommodation	
<b>Lead Member for 2018/19</b>	Deputy James Thomson
<b>Officer contact</b>	Martin O'Regan, Accommodation Programme Director (CoLP), 020 7601 2111

The City of London Police has continued to develop their accommodation strategy requirements in line with the principles set out within the original consultant's report (DTZ) in April 2012. Clearly, the original proposals have had to be revised based upon the initial concept was assuming programme delivery would have been completed in 2017. Accommodation Board meetings have continued throughout 2018/19, ensuring strategic objectives of the programme were monitored and achieved. Regular meetings have also continued with the Police Authority Board and the City Surveyors.

James Thomson as Lead Member along with the Chair of the Police Authority Board, Doug Barrow have regularly met with officers of the Force to review and engage with the developing proposals. The recently formed Police Accommodation Working Party has also enabled members to have a more detailed input to the emerging issues on the Fleet Street development. This enable members to challenge the submissions of the CoLP scope of requirements prior to submission to the Capital Buildings Committee. These engagements have all contributed towards collaborative and positive progress for the overall accommodation programme.

### **Achievements in 2018/2019**

During the past year:

The City of London Police has jointly been developing the overall accommodation programme with the Architects and City Surveyors. Significant concept design proposals have been progressed regarding the feasibility and master plan for the Fleet Street development.

Extensive work has taken place in defining the City of London Police requirements for the new facility. The work to date remains at 'high level design' stage and will be evaluated further as we move into the next detailed design stages of the programme. This has been a positive process with members of the CoLP accommodation programme team working closely with consultants, City Surveyors and the architects to provide a much more cohesive and collaborative approach to develop the overall scope of requirements for the Force.

A comprehensive scope of requirements has been provided to the Police Accommodation Working Party and submitted to the Capital Buildings Committee in July 2019 for approval.

The decant works element of the programme is now improving and positive progress is being made. This has undoubtedly been one of the challenges over the past 12 months and the delays have been unfortunate but unavoidable.

There remain challenges that will need to be overcome as the decant works particularly at New Street progress. Heating and ventilation remain a major concern until the overall system is embedded and the emerging faults are rectified enabling the overall system to be stabilised and function correctly.



The next key phases of the decant works within New Street and Bishopsgate have commenced June 2019, with Overbury as the main contractor now managing both sets of works. It is envisaged this will provide a much more cohesive and managed approach to the phasing of the planned works ahead.

### **Priorities for 2019/2020**

The following items will highlight the significant elements of the accommodation programme to be developed and delivered in the forthcoming 12 months:

- Approval of Capital Buildings Committee to commence detailed design stage for the Fleet Street development
- Mobilise the detailed design project teams within CoLP to support the process with architects, consultants and City Surveyors
- Formalise with the security consultants the handling and retention arrangements for all information relating to the Fleet Street development
- Scope and design of the potential JCCR development at 65 Basinghall Street (if approved)
- Confirmation and design of new Firing Range pending confirmation of site from City Surveyors (if approved)
- Completion of the interim decant works at New Street and Bishopsgate
- Completion of the Middlesex Street Car Park works
- Completion of the DOSF facility for CoLP specialist teams
- Completion of the HAC works for Mounted (or seek alternative)
- Decommission and disposal of Snow Hill
- Decommission and disposal of Wood Street

Community Engagement & ASB	
Lead Member for 2018/19	Tijs Broeke
Officer contact	T/Chief Insp Jesse Wynne 0207 601 2472

## **Achievements 2018/19**

### **Reviewing how we engage with our communities**

Working with the Safer Communities Project Team under the One Safe City Programme and Corporate Communications, the methods through which we engage with our communities have been reviewed and a proposal for improving our website and social media use produced for implementation in 2018/19. The Engagement Working Group continues to improve inter-department working across the force and with the Corporation of London and to ensure our engagement takes in the views of our partners.

### **Engaging our schools and our young people**

Our police cadets continue to be a credit to the force and throughout the year have helped to support the City of London Police during operations such as the Lord Mayor's Show and crime prevention bike marking events. Two police cadets this year have become special constables.

### **Community involvement in Project Servator**

As part of the community's crucial involvement in Project Servator, the Force piloted ReACT training for security personnel, a natural lead on from the Project Griffin training most guards in the City undertake. The training concentrates on preparing specialist guards in key businesses and areas around the City to work jointly with the Project Servator team.

Such has been the success of the pilot sessions in the City that 2018/19 has seen the embedding of a permanent national Servator team who are rolling our Servator training to forces nationwide lead by a Superintendent. The local Servator team also continues to work daily with our local community with a dedicated team of 1 sergeant and 12 police officers.

### **Tackling and Preventing Anti-Social Behaviour (ASB)**

#### **Anti-Social Behaviour**

The predominant reasons for reporting ASB remain related to:

1. Inconsiderate behaviour (this included references to drunken behaviour)
2. Begging/rough sleeping
3. Drunken behaviour

Following feedback from stakeholders and request from Members of the Police Authority Board the Force has added Anti-Social Behaviour as strand under 2019/20 Local Policing Plan.

#### **Youths cycling**

Noticeable and already being managed is the steep increase in reporting around youths cycling, often in large numbers, in the area of Castle Baynard Street and Tower Place. This is receiving a multi-agency response as well as liaison with local businesses impacted by the behaviour. Section 35 dispersal powers are being utilised and engagement work has been undertaken along with the Metropolitan Police and British Transport Police in encouraging the organisers of these events to seek alternative locations to cycle. The Lead Member has raised questions about oversight and reporting of these powers.

## **Begging and Rough Sleeping Response**

There is no recourse or mandate for a police service to manage rough sleeping as we have no resources to offer them in terms of accommodation and support. We do act as a referral service, and coordination with City of London Corporation and other services is essential. CoLP actively participate in the Homelessness and Rough Sleeping Sub-Committee.

In the city we have no intrinsic link between rough sleeping and begging. City beggars are mainly clients from other boroughs that transit here to beg, many of whom are in supported accommodation. We are fairly unique in the square mile in that we are able to say that 90% of our beggars are not City rough sleepers.

Therefore, within the City of London Police, we are separating rough sleeping from begging. To this end, we designed and developed Operation Luscombe to specifically tackle the issue of begging. The premise of this operation is that if someone is a genuine rough sleeper and are found to be begging, then they are given two opportunities to attend an intervention hub before we get to the CPN stage (Community Protection Notice). A CPN enables the police or authorised authority to ban an individual from an area for up to three months. If they are still begging (which as a rough sleeper there is no need to do unless feeding a drug habit) only at the third intervention will we issue a CPN. To date, none of the CPNs issued have been to known City rough sleepers, all have been to professional beggars. If they are then found to be in breach of their CPN, we will make an application to the courts for a CBO (Criminal Behavioural Order).

## **Licensing**

The CoLP Licensing Team continues to work closely with the CoL Licensing Team, undertaking joint licensing visits and taking a pro-active approach to addressing any issues.

The Late Night Levy in the City is now in its fifth year and a regular forum with premises operators ensures they have a say in how the funds are used. The Levy provided a considerable increase in resources over the busy Christmas period and in December funded a successful pilot of joint patrols between a police officer and London Ambulance Service paramedic to relieve the heavy demand on the emergency services caused by the night time economy. 90% of the calls attended by the police/paramedic cycle team were assessed by the paramedic as being alcohol related. 79% of these calls resulted in ambulances being cancelled and alternative outcomes being sought.

The Late Night Levy will contribute towards retaining an Inspector post in the licensing team.

## **2019/20 Priorities**

- Implement Anti-Social Behaviour strategy as part of 2019/20 Policing Plan, continue to proactively engage in Safer City Partnership strategy and meetings
- To continue to support the City of London Corporation and outreach services to address begging issues within the City, and attend the Homelessness and Rough Sleeping Sub Committee
- To continue progress towards a joined-up approach to engagement across the force and with the Corporation, through contact sharing and the joint Community Engagement Working Group
- Constitute a new Community Scrutiny Group and resolve refresh of Independent Advisory Group – report back to the Police Authority Board in July 2019
- To implement the social media and website developments as a result of the force's engagement review
- To ensure best use of the Late Night Levy funding to provide resources at the right time and place to support a safe Night Time Economy

## Public Order

### Lead Member for 2018/19

Emma Edhem

### Officer contact

Chief Supt Glenn Maleary and Chief Inspector Rob Wright,  
Uniformed Policing Directorate.

020 7601 2101 / 2085

## Developments and Achievements in 2018/2019:

### Public Order Demands in the City of London

The table below shows public order offences have increased in comparison to the last performance year 2017/2018 by 65%. Dip sample analysis shows Bishopsgate, Liverpool Street and London Wall as repeat locations for both crime types. There is a dedicated police/partnership group that meets every four weeks to consider violent crime and implement appropriate tactics. This is a key area that will continue to be a principal focus and challenge in the coming year.

	Volume YTD Previous year (2017/2018)	Volume YTD Current Year	Frequency Change	Percentage Change
PUBLIC DISORDER	234	385	151	65%

This review period has been a strenuous one in terms of policing public disorder as well as the ongoing National threat level from International Terrorism set at SEVERE. With the ongoing BREXIT negotiations bringing the political stance of the UK into question the City of London police along with the MPS and BTP are continuously planning and resourcing for incessant and persistent demonstrations throughout 2019 from the right and left wing supporters:

- Low level football related violence occurred by a group called Democratic Football Lads Alliance (DFLA) which included factions of the English Defence League (EDL). These protests/marches were against Islamic extremism post London Bridge and Borough Market attacks. There has been no significant disorder, however they did require a fair amount of CoLP resources when supporting Tommy Robinson re trial at the Old Bailey
- The Independent Taxi Alliance (ITA) and United Private Hire Driver (UPHD), (a pro-active driver led organisations representing 5k+ members) held week long demonstrations across London against TfL and the Mayor of London. No offences were committed during the protests, however, significant travel disruption and road congestion was caused with London Bridge being closed in the interim and buses being diverted. With the supposed lack of resolution, the protests are set to continue and it is insinuated by the group that future protests will be high profile e.g. state visits, functions London Mayor Sadiq Khan or PM Theresa May attends.
- The ongoing Brexit negotiations continue to dominate the political landscape. A number of leave and remain protests have taken place within the MPS & CoLP environs during the reporting period. As we approach Brexit "actual" there are a number of demonstrations planned. There is a large degree of traditional left/right-wing confrontation superseding the issue of Brexit in deference to what is regarded as a more established threat from the opposing political side. Brexit has highlighted and cemented issues already present from a public order perspective and not led to a mixing of the two, despite Brexit blurring the line between left and right-wing politics.
- The Left Wing in London, primarily those under the anti - fascist umbrella, have tended to

focus their energies in opposing Brexit and Mr Trump visit in 2018 and the potential visit in late 2019 (NATO anniversary conference).

- Road Blocks (swarming) and Bridge Occupations have become the tactic of choice for a number of protest groups (e.g. Yellow Vests and Extinction Rebellion) during the reporting period. This trend is expected to continue throughout 2019.
- Extinction Rebellion have become the UK's primary Climate Change protest group. The group's sustained period of protests and mass arrests during November and December proved a planning, resourcing and Intelligence gathering challenge. They have already stated their aim of replicating their 2018 success going forward into 2019 with the two weeks of International Rebellion in April. They have managed to integrate previously separate protest themes (airport expansion, carbon emissions, fracking and HS2) under their banner. On Friday 14th February 2019 a Youth 4 Climate protest attracted 4-5000 young people in Central London. Similar tactics to Extinction Rebellion were utilised by an older youth group with considerable disruption caused in Central London. Members of Extinction Rebellion were in attendance advising the group.

#### **.Recruitment/Resources stance of Public Order Officers**

- The Public Order Strategic Threat and Risk Assessment (POSTRA) specifies that the number of officers employed on the City of London Support Group (L1 Public Order) as 1 Inspectors, 5 Sergeants and 32 Constables.
- The City of London Police is able to fulfil its commitment of two protected PSUs (each PSU is made up of one inspector, three sergeants and 21 constables) to public order in London.
- The number of level one specialist public order trained officers is currently one inspector, four sergeants and 26 constables. Level 2 trained officers' number five Inspectors, 15 Sergeants and 64 constables. The aim is to have a minimum of 6 Inspectors, 9 Sergeants and 55 constables.
- City of London Police has 4 nationally trained and accredited Gold Commanders, 5 nationally trained and accredited Silver Commanders and 9 nationally and accredited Bronze Commanders

#### **Priorities for 2019/20:**

Impending government spending review and budget constraints could have a considerable impact on the way public order is policed in London. Collaboration with Metropolitan Police Service and British Transport Police is needed to manage the identified risk and threat to London. Strong working relationships and partnerships is required to help resolve issues around resources and assets that are available from the regional forces and reduce the impact and effect to any one Force. The MPS have made a number of requests for City resources and there has been significant collaboration, which supports the current formal public order agreement between the CoLP and MPS under Operation Benbow.

As a direct result of the threat to the UK, and London in particular, it is necessary to have a range of options to respond to terrorist activity. The City of London is the identified heart of the Country's financial industry and the co-location, within such a small area, of many major national and international institutions and iconic sites make it a prime target for any terrorist attack. It is stressed that while the threat to the UK from terrorists remains the use of chemical, biological, radiological or nuclear warfare (CBRN) is only one of the options available to them. The potential scale of a real CBRN incident should not be underestimated. It will call for joint operations involving a multi-agency approach. CBRN Counter Terrorism is a national problem which requires national responses, where individual Forces will prepare local plans based on common national procedures, standards and doctrine.

**CBRN** - City of London Police has two (2) nationally trained and accredited CBRN Bronze Cadre and one (1) Silver CBRN Cadre. They have a CBRN Tactical advisor and a forensic capability with two (2)

Forensic officers trained. All of the Support Group are trained to respond to a CBRN incident in the City of London

**Public Order** - The potential visit of President Trump to the UK in late 2019 for a NATO conference has already seen a number of protests planned within London. It is expected that even if Mr Trump's itinerary does not bring him to within the MPS, these protests will go ahead as per previous visit. We would also expect to see smaller protests in support of Mr Trump.

### **Organisational**

The Force has a governance structure to ensure that the PO STRA process informs the strategic decision making with regard to priorities, resource use and training. It is critical to an organisation that there is a process to escalate issues effectively to Chief Officer level, but also for the Senior Management Board to effectively direct more local governance structures. The Governance Structures in place working from the tactical to the strategic are:

**Public Order Working Groups** – Public Order Inspectors are responsible under the direction of the Public Order Forum to engage with all ranks to identify any particular issues that need to be addressed.

**Public Order Forum** – consisting of experienced specialist and tactical officers who cover operational, training and equipment issues and identifying emerging threats and risks. This Forum provides an opportunity for organisational learning to be identified. The Forum is chaired by Chief Inspector – Operational Support.

**Organisational Learning Forum** – consists of members from all areas of the force who address training/learning issues from within the force and also respond to the IPCC 'Lessons Learnt' publication. The Chair of the Public Order Forum attends this meeting. The Forum is chaired by the Assistant Commissioner.

**Senior Management Board** – This is the most strategic board in the City of London Police with Directorate Head representation. The Assistant Commissioner who chairs the Organisational Learning Forum is a member of this Board. The SMB is chaired by the Commissioner.

### **Operational Highlights 2018-19**

**Commonwealth Heads of Government Meeting (CHOGM) (Monday 16<sup>th</sup> to Friday 20<sup>th</sup> April 2018)** took place in London to promote prosperity, democracy and peace. The UK hosted this meeting when leaders from all the member countries gathered in London and Windsor. Events in the City took place from Monday 16<sup>th</sup> April to Wednesday 18<sup>th</sup> April. There were no incidents of disorder. Protests and civil disobedience occurred but with little impact on the event. MPS lead operation with CoLP assistance.

**TUC March & Rally (Saturday 12<sup>th</sup> May 2018).** The Trades Union Congress held a march and rally entitled A New Deal for Working People. The event was held as part of the TUC Great Jobs Agenda Campaign. Various Trade Union groups will be assembled on the Embankment between Hungerford Bridge and Blackfriars Bridge. The procession followed a route through London to a destination of Hyde Park. Speakers included TUC General Secretary Frances O'Grady, Union Leaders and front line workers. Our information suggested that 30,000 to 35,000 people attended this event. No issues no disorder. MPS lead operation with CoLP assistance.

**Peoples Assembly – NHS 70<sup>th</sup> Anniversary March (Saturday 30<sup>th</sup> June 2018.)** The TUC, Peoples Assembly and Health Campaigns Together held a March and rally to mark the 70th anniversary of the founding of the National Health Service. Up to 20,000 people were expected to take part however these numbers were lower than previously estimated due to the recent TUC March and the upcoming protest of the President of the United States of America in July 2018. No issues. No disorder. MPS lead operation with CoLP assistance.

**The visit of the President of the United States of America (Friday 13<sup>th</sup> July 2018.)** President Trump visited the United Kingdom. The visit resulted in a number significant protests within the Capital from a number of diverse groups. Protests were expected to attract a broad section of the British/International public including Politician's and celebrities. The anti-Trump demonstrations were in the large being labelled as Left Wing. Comments on forums such as Urban 75 and Left Unity suggested that groups/ Politicians from across the UK political spectrum were likely to be out in protest of this visit. Whilst the number of individual demonstrations over the 13th appeared high, the expectation was that a significant number of people moved between the events throughout the day. No issues except issues of civil disobedience.

**Tommy Robinson Hearing Old Bailey (27<sup>th</sup> September 2018.)** The trial of Tommy Robinson took place at the Old. The trial received attendance from Tommy Robinson supporters and Left Wings groups "Stand up to Racism". The Tommy Robinson supporters comprised of groups including Justice for Our Boys, Generation identity UK, the DFLA and UKIP. There was no disorder on the day however due to the numbers attending disruption was caused as Ludgate Hill was blocked for some time. (Est 60mins). CoLP lead operation with MPS assistance.

**Peoples Vote for the Future (Saturday 20<sup>th</sup> October 2018.)** Anti-Brexit march through central London, advertised and promoted under different names. The 'People's Vote March for the Future' event is a point-to-point march from Park Lane to Parliament Square via Piccadilly and Pall Mall, culminating with speeches in Parliament Square. Organisers estimated numbers on the day would reach between approximately 100,000 and 125,000. Actual numbers were between 150,000 – 200,000. No issues. No disorder. MPS lead operation with CoLP assistance.

**Tommy Robinson Hearing Old Bailey (Tuesday 23<sup>rd</sup> October 2018.)** The trial of Tommy Robinson took place at the Old. The trial received attendance from Tommy Robinson supporters and Left Wing "Stand up to Racism"

**Lord Mayors Show & Banquet (Saturday 10<sup>th</sup> Sunday 11<sup>th</sup> November 2018)**

**Remembrance** Sunday and Monday 12<sup>th</sup> November 2018 – Banquet.

**New Year's Eve celebrations** Monday 31<sup>st</sup> December 2018 – Tuesday 1<sup>st</sup> January 2019.

**Saturday 3<sup>rd</sup> February 2019. The People's Assembly against Austerity and Health Campaigns Together** held a Demonstration entitled 'NHS in Crisis - Fix It Now!' in Central London. PAAA Protests are generally well organised with little or no issues of disorder. However, the scale and scope of anti-austerity protests meant that organisers were unable to control some protest groups attaching to the event to enforce their own agenda. Numbers attending this event were 10,000. MPS lead operation with CoLP assistance

### **Intelligence**

Violent Crime Task Force Operation Sceptre PAN London approach working with Metropolitan Police Service and British Transport Police to reduce knife crime and the number families affected by knife crime across the whole of London. Targeting not only those who carry and use knives, but also the supply, access and importation of dangerous and offensive weapons/knives.

### **Welfare**

Capacity to meet demand is generally viewed by officers on the Support Group as one of the main factor that impacts on their general wellbeing. Officer numbers on the Support Group have been at low levels for the last 18 months and it is this main factor that has had a knock-on effect. Officers on

the Support Group continuously work extended hours in ever-changing environments that can cause great mental and physical stress. Over a protracted and prolonged period this causes tiredness and fatigue on the unit. With the anticipated arrival of new officers and the continuous recruitment drive within the CoLP, this can only be a positive move and beneficial to the unit.



## Road Safety and Casualty Reduction

### Lead Member for 2018-19

Alderman Alison Gowman

### Officer contact

Inspector Paul Doyle

### Background

The City of London has a network of roads that have developed over a thousand years and have therefore not always been planned with today's traffic and pedestrian flow in mind. This means that there are a large number of different road types in a confined area which inherently causes more conflict between its users than a city with a more modern transport landscape.

In calendar year 2018 there were 357 casualties from 317 injury road traffic collisions in the City of London. Of these, 84 casualties sustained serious or fatal injuries, an increase of 32 on the previous year.

The three groups of most vulnerable road users are pedestrians, cyclist and motor cyclists and account for 82% of all casualties.

The number of reported personal injury collisions (for vulnerable road users who sustained any level of injury) that occurred in 2018 (Jan – Dec) was 292, a slight reduction on the two previous years (295 in 2017 and 322 in 2016.)

Casualty	2018	2017	2016
Pedestrian	89	105	107
Cyclist	121	122	144
Motor Cyclist	82	68	71
Total	292	295	322

### Organisation

Oversight for this area of Special Interest is conducted by Alderman Gowman. Throughout 2018 Alderman Gowman has worked on a variety of projects, including as the Chair of the Corporation of London's Active City Network and the City's representative on the London Road Safety Council. She facilitates a liaison between these organisations and the City of London Police (CoLP) and the Corporation's Road Safety Team. In particular, she arranged for one of the forensic collision staff to present to the London Road Safety Council on post collision investigation. This has included liaison regarding the new Road Danger Reduction plan.

The responsibility for supporting casualty reduction is owned by the Superintendent of Communities within the Uniform Policing Directorate. Following the formation of Transport and Highways Operations Group (THOG) in 2016, the department utilises specialist roads policing officers to target criminal enforcement on the areas of highest risk, and to support the Corporation of London and Transport for London road safety education activities.

The City of London Police is supported by a TfL funding secured through a Special Services Agreement that requires the CoLP to deliver specified special services which are linked to the specific services mentioned in the TfL contract.

The Transport and Highways Operations Group is led by an Inspector whose role it is to co-ordinate the policing activity that is designed to support the City of London Corporation's priority to reduce casualties, fulfil the requirements of the Special Services Agreement with TfL and provide specialist roads policing support within City of London Police as part of the Roads Policing Control Strategy.

#### **Achievements in 2018**

- Criminal enforcement campaigns run weekly, with increased use of social media messaging to encourage behaviour change amongst all road users.
- CoLP is supported by funding to deliver enforcement around taxi and private hire vehicles. Overall, CoLP officers 'stop-checked' a total of 6100 Hackney Carriage and Private Hire vehicles, with a number being non-compliant with either taxi regulations or having committed moving traffic offences.
- CoLP Commercial Vehicle Unit has continued working as part of the pan-London Freight Compliance Unit, undertaking targeted enforcement of the commercial vehicles in conjunction with Driver and Vehicle Standards Agency and Metropolitan Police. This has resulted in 179 operations in City area, with 951 commercial vehicle stop-checked.
- Specialist Roads' Policing officers have been utilised in operations to tackle vehicle-enabled crime and in support of community policing operations to tackle neighbourhood issues.
- CoLP THoG will be re-named as the Roads Policing Unit. This is to reflect the change in how we will deliver our services in the future. This includes a tactical pursuit intervention team that has received significant coverage on the BBC. Staffing is at its highest in a number of years and new technology with speed devices, reporting tools and frontline systems will lead to an increase in enforcement and education.

#### **Key issues for 2019/20**

- Vision Zero will remain the core focus of RPU. Eradicating deaths and serious injuries on London's roads and tackling the "fatal 4" will be at the heart of everything we do. We wish to play a pivotal role in making the City of London area one of the safest in London
- Partnership working between CoL and CoLP continues to reduce the number of vulnerable road users being injured in collisions through Road Danger Reduction Partnership.
- CoLP continues to be supported by TfL funding to deliver specific services. This includes the provision of officers for Commercial Vehicle Unit to focus on large goods vehicles to reduce the risk posed by these vehicles to other road users.
- Replacement to a greener, leaner vehicle fleet with ambitions to further complement Vision Zero's greener London principal.

## Safeguarding and Public Protection (Vulnerability & ICV Scheme)

<b>Lead Member for 2018/19</b>	Nick Bensted-Smith
<b>Officer contact</b>	Craig Spencer ICV Scheme Manager & DCI Matt Mountford (0207 601 2620)

## Safeguarding and Public Protection (The ICV Scheme)

### Background

City Visitors are volunteers who give up their free time to provide independent scrutiny of the treatment of those held in police detention and the conditions in which they are held. They play a vital role in bringing together police and communities closer together and enhancing public perception of police procedures and practice in relation to custody.

The Panel is presenting the annual report at this May Meeting of the Committee. The details below are a summary of the main issues dealt with in the last year.

### Organisation

The City of London Independent Custody Visitor (ICV) Panel currently consists of around 12 visitors who visit the custody suites at Bishopsgate Police station once a week (and other occasional visits to Snow Hill). Nick Bensted-Smith attends the quarterly Panel meetings and, in addition, representatives of the Force attend for part of the Panel meetings so that any queries or problems that have arisen out of custody visits can be addressed. The meetings are supported by staff from the Town Clerk's department.

### Highlights in 2018/19:

**HMICFRS Inspection** – An unannounced Custody Inspection by the Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) of the City of London's Custody Suite in November 2018. The Chairman of the ICV Panel and the Scheme Manager were interviewed as part of the process and the ICVs were praised for their input and how the custody team reacted to issues raised by the Panel. The primary issues highlighted were poor record keeping, lack of strategic oversight and the current facilities available at Bishopsgate. However, it should be acknowledged that this was an encouraging inspection and the culture was highlighted as a positive.

The areas for improvement (AFIs) will be addressed by the Force and there will be a response to the inspection report when this is published. Progress against the recommendations and AFIs from the report will be included in the regular HMICFRS updates that go to the quarterly Police Performance and Resource Management Sub Committee for Member scrutiny.

**National Accreditation** - The Panel has been rated as a Silver scheme by the National Association as part of their assessment framework. Considering the size of the scheme this is the appropriate level for the scheme due to the Gold criteria being disproportionate. The process has provided some best practice from other Forces which has been adopted, including performance monitoring for ICVs to ensure consistent standards across the Panel.

**Reporting Forms** - The Panel have also introduced new reporting forms to adhere to national standards. The forms now allow visitors to focus on vulnerable detainees and their treatment. Any issues raised by visitors are now more easily identified and further details can now be given.

**Panel Training** – The Panel have received training on vulnerable detainees, particularly around mental health and young persons. This has included inviting partners to present on their work including the Liaison and Diversion service in the City. The Vice Chair, Chairman and Scheme Manager have all been involved in training for new custody sergeants and gaolers explaining the role of ICVs. ICVs will also be attending future vulnerability training which is delivered to CoLP Officers.

**Custody visit throughputs** – The Panel has been successful in having a spread of visits across the week which is more appropriate to the usage levels in the custody suites at particular times. This has included visiting at the busiest times. The Panel continue to undertake their first visits between the hours of Midnight and 6am and were very impressed at the service given.

**Appropriate Adults** – This service is commissioned by Community and Children's Services (CCS) and there has been concern from both Panel members and custody staff over the service out of hours and their provision for vulnerable adults. The Scheme Manager is now being consulted on the future contract with ICVs will continuing to monitor the service on their visits.

**Voluntary Attendance** - There is a legitimate concern from the Panel and ICV Scheme Manager that PACE and Health Care Professional contracts do not currently cover voluntary attendance – as such, the Force are investigating that those that do voluntary attend and are vulnerable, are appropriately supported.

#### **Priorities for 2019/20:**

Some of the areas that the Panel will look at during 2019/20 include:

- promoting and raising awareness of the work of the ICV Panel and being aware of national trends;
- to further engage with the MOPAC arranged scheme to build a wider knowledge base and work with British Transport Police on a visit to the Brewery Road facility.
- continue to build on current training programme at Panel meetings including future focuses on equality, bias and use of force.
- to conduct a joint visit with the lead Police Committee member for the ICV Panel to Bishopsgate Custody suite.

#### **Safeguarding and Public Protection (Vulnerability)**

##### **Achievements in 2018/19**

The Vulnerability Working Group and Vulnerability Steering Group continue to provide oversight and drive performance in relation to all strands of vulnerability. The force has created a Force Vulnerability Action Plan (VAP) in line with the National VAP to streamline the reporting on strands of vulnerability. This has included reducing the number of individual strands of vulnerability to ensure appropriate focus and activity.

A vulnerability dashboard has been created ensuring improved data and performance information in relation to the strands of vulnerability and to drive operational and strategic activity.

Vulnerability training continues across the workforce, with Learning and Development delivering the College of Policing endorsed training programme for a more holistic oversight in relation to police response to vulnerability. This training was deemed mandatory through the force Training Improvement Board, and to date 554 officers and staff have received the package. The programme involves case studies covering the different strands of vulnerabilities and the development for next phase training will include more specific training around domestic abuse, risk assessments, victimless prosecutions and evidence gathering, completing of PPNs, response to CSE and CCE and identifying both of these.

The Public Protection Unit developed and rolled out the 'Spotting the Signs' campaign which included a digital toolkit developed for businesses. Relevant for both employees and employers, it included a handbook with how to support employees who may be experiencing abuse, and guidance for those suffering. The material included a case study video from a victim of a city offence outlining the support and service that could be expected from the COLP. Work continues to expand the toolkit to target and include other areas – e.g. those that do not speak English who may be working in City e.g. cleaning or hospitality services.

Two phases of Operation Alarm Call have now concluded which was run in collaboration with the Metropolitan Police Service. This innovative operation utilised CoLP cadets to test a hotel's response to Child Sexual Exploitation (CSE). The operation attracted positive coverage in national press, further enhancing its reach and learning. 21 hotels were visited during the two phases of the operation with mixed results. Debriefing and training are being offered to a number of hotels to improve their awareness and ensure that staff are adequately trained to identify and respond to signs of CSE and modern slavery and/or human trafficking.

Alternate funding for the vulnerable victim advocate role has been secured for 2019/20 through Proceeds of Crime Act funding (POCA). Previously 50% of the funding was derived from the Mayor's Office for Policing and Crime (MOPAC). A more sustainable funding stream is required to future proof this post which has been highlighted during HMIC PEEL inspections as a positive contributor towards good/outstanding grading.

A number of Modern Slavery and Human Trafficking champions have been created to deliver advice and guidance to the workforce and also to the wider community to enhance understanding and report of MSHT. The CoLP has supported Op Aidant, a National Crime Agency initiative to target different types of MSHT criminality.

The Mental Health Street Triage (MHST) is a scheme whereby mental health professionals provide on the spot advice to police officers who are dealing with people with possible mental health problems. This advice can include an opinion on a person's condition, or appropriate information sharing about a person's health history. The aim is, where possible, to help police officers make appropriate decisions, based on a clear understanding of the background to these situations. This should lead to people receiving appropriate care more quickly, leading to better outcomes and a reduction in the use of section 136. From 1/11/18 to 31/1/19, when a MHST Nurse was present, 48 S136s were avoided. This equates to approximately 384 officer hours, or the equivalent of 48 days saved. The hourly rate for a police officer including on-costs is £59 per hour equating to £22,656 saved over three months.

A provisional 'GOOD' grading has been awarded for the 2018/19 PEEL inspection for area of vulnerability, the final report is yet to be published. This along with a 100% conviction rate for charged domestic abuse cases (from April 18 to Feb inclusive) demonstrates the exceptional work and determination of the Public Protection Unit and wider force in addressing all areas of vulnerability.

## **Future challenges**

Securing a longer term and sustainable funding stream for the Vulnerable Victims Advocate role is critical. The role is fundamental to the CoLPs service delivery towards victims and collaborative arrangements with other forces. POCA funding is not viable in the longer term and therefore other funding lines will need to be explored and realised.

Further development of the capability to utilise online systems to monitor the sharing of indecent images of children and identifying those that may pose a risk to children is required – Anna anything specific around the challenge on this one?

Following the success of Operation Alarm Call, it is essential that continued community engagement with hotels in the City continues. With a growing night time economy and new hotels under construction a continued meaningful dialogue will be required with management to ensure new staff are trained. With a high turnover of staff this could be challenging.

For financial year 2019/20, the cost of the element of MH street triage that is funded by the City of London Corporation (CoL) and the Police will be £92,745. This funds the additional three days that ensure the service is a seven days a week service – but it is also the full year cost. The CoL has already funded the project fully until the end of June 2019. Moving forward the CoL (Commissioning & Partnerships) will share the cost of the service with the City of London Police. For the next financial year, it will be necessary to fund the period July 2019 - March 2020 at a cost of £69,560 in total, which when split between the Corporation and the Police amounts to £34,780 each. The City of London Police will be looking to pay for their share in Proceeds of Crime.

<b>Committee(s):</b>	<b>Date(s):</b>
Police Authority Board	11 July 2019
<b>Subject:</b> The Offensive Weapons Act 2019	<b>Public</b>
<b>Report of:</b> Office of the City Remembrancer	<b>For Information</b>
<b>Report author:</b> Jaysen Sharpe, Office of the City Remembrancer	
<b>Summary</b>  The Offensive Weapons Act 2019 criminalises the sale of ‘corrosive products’ to persons under the age of 18, their delivery to residential premises, and their possession in public. The Act also makes provision relating to knives and creates a new offence of possession of an offensive weapon, which will include so-called ‘zombie knives’. Further measures include a ban on the delivery of knives to residential premises.	
<b>Recommendation(s)</b>  Members are asked to note the report.	

## Main Report

### Background

1. The Act received Royal Assent on 16 May 2019 and in addition to the creation of other related offences, bans the sale of corrosive substances to those under 18, ban the delivery of ‘bladed articles’ to residential premises, and make the possession of a ‘zombie knife’ an offence.
2. The provisions of the Act which relate to the sale of corrosive products and offensive weapons will be enforced within the Square Mile by the Common Council acting in its capacity as a weights and measures authority.

### Corrosive Substances

3. The Act criminalises the sale of corrosive substances to persons aged under 18 and the delivery of corrosive substances to residential addresses. Possession of corrosive substances in a public place also becomes an offence under the Act, subject to a defence of ‘good reason’ or lawful authority. A defence applies in circumstances where a corrosive product is sold by ‘remote sale’ to a person under 18 if the seller operates a system to check that purchasers are over the age of 18 and the system is likely to prevent those under 18 from purchasing corrosive substances.
4. Of potential relevance to the City of London Police is the amendment to ‘stop and search’ powers under the Police and Criminal Evidence Act 1984. This will

enable a constable to stop and search persons and vehicles where the constable has reasonable grounds for suspecting that a person has a corrosive substance in a public place and will permit a constable to seize any corrosive substance found.

## **Knives**

5. The delivery of 'bladed products' to residential addresses following a remote sale is criminalised. A defence is provided where the seller has procedures in place which were likely to ensure that any bladed product would be delivered to a person aged 18 or over and took all reasonable precautions and exercised all due diligence to ensure that the product would be delivered to person aged 18 or over.
6. This includes bladed tools such as Stanley knives and saw blades. Exemptions are provided where the bladed product was designed or manufactured for the buyer in accordance with their instructions, or where the bladed article is supplied for historical re-enactment or sporting purposes.
7. The Act creates a new summary offence for possessing an offensive weapon in private, whereas previously the offence could only be committed where the weapon is "manufactured, sold, hired, offered for sale or hire, or possessed for the purpose of sale or hire, imported, or lent or given to any other person". It also amends the list of offensive weapons to include so-called 'zombie knives' and alters the definition of a flick knife.
8. Defences are provided where the offensive weapon is possessed by a person acting as an operator, or on behalf of a museum. This may be of potential relevance to the Museum of London if such weapons are included in their collections. Other relevant defences in relation to the possession of an offensive weapon in private include where "the weapon in question is one of historical importance".

## **Firearms**

9. The Act prohibits the possession of chambered weapons (excluding rifles chambered for 0.22 rim-fire cartridges) from which cartridge cases are extracted using energy from propellant gas or from energy imparted to an energy storage device by propellant gas.
10. Additionally prohibited are so-called 'bump stocks', which are devices that enable semi-automatic weapons to achieve a higher rate of fire by using the recoil energy of the rifle to place repeated pressure on the trigger. Provision is made in the Act for the surrender of such weapons and devices to the police and for payments to be made by the Secretary of State in respect of the surrendered weapons and devices.

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<b>Committee:</b> Police Authority Board	<b>Date:</b> 11 July 2019
<b>Subject:</b> The City of London Police Pensions Board – Review of Activities for the period 1 April 2018 to 31 March 2019	<b>Public</b>
<b>Report of:</b> The Chamberlain	<b>For Information</b>
<b>Report author:</b> Graham Newman – Chamberlain’s Department	

## Summary

This report summarises the activities of the Police Pensions Board for the period 1 April 2018 to 31 March 2019. The Police Pension Scheme Regulations 2015 provided for the establishment of a Board with the responsibility of assisting the Scheme Manager (the Commissioner of the City of London Police) in ensuring the efficient and effective governance and administration of the Police Pension Scheme (PPS).

Over the last twelve months the Board:

- continues to review the working practices of the City of London Police Pensions Office including reviews of all letters and documents issued to members, prospective members, leavers and retirees;
- monitored and where appropriate updated the Risk Register for the Board;
- received training on relevant pension matters at each Board meeting; and
- continues to undertake online training modules with the Pensions Regulator’s Toolkit.

The training needs of all Board Members continues to be monitored and training provided as required.

## Recommendation

Members are asked to note this report.

## **Main Report**

### **Background**

1. The Public Services Pensions Act 2013 (the 2013 Act) included several provisions regarding better governance and improved accountability for all public-sector pension schemes. As a result, the Police Pension Scheme Regulations 2015 provided for the establishment of a Board with the responsibility of assisting the Scheme Manager in ensuring the efficient and effective governance and administration of the Police Pension Scheme (PPS).
2. The Scheme Manager for the City of London Police Pension Scheme is the City of London Police Commissioner, with responsibility for the administration of the Scheme delegated to the Chamberlain of the City of London Corporation.

### **The Role of the Police Pension Board**

3. The Pension Board sits in an oversight role, to assist the Scheme Manager with ensuring the administration of the Scheme complies with
  - the Regulations;
  - other legislation relating to the governance and administration of the Scheme; and
  - the requirements imposed by The Pensions Regulator in relation to the Scheme.
4. In accordance with the Regulations, the structure of the Board must include an equal number of scheme member and scheme employer representatives. The City of London Police Pension Board consists of 3 scheme Member representatives and 3 scheme employer representatives.
5. The 2013 Act makes it a legal requirement that members of the Board do not have a conflict of interest and therefore all members are expected to identify, monitor and manage any potential, actual or perceived conflicts of interest. The Members of the Board are as follows:

#### *Scheme Employer Representatives:*

Alderman Ian Luder (Chairman) – Elected Member

Mr Alexander Barr – Elected Member

Superintendent Helen Isaac – Serving CoL Police Officer

#### *Scheme Member Representatives:*

Mr John Todd (Deputy Chairman) – Retired CoL Police Officer

Mr Philip Hodgson – Retired CoL Police Officer (since October 2018)

Mr Timothy Parsons – Retired CoL Police Officer (since October 2018)

Constable Davina Plummer – Serving CoL Police Officer (resigned September 2018)

Mr Kieron Sharp – Retired CoL Police Officer (Resigned September 2018)

Appendix A sets out the attendance record of each Board Member.

## Activities of the Board

6. Since 1 April 2018 three meetings have been held – 30 May 2018, 3 October 2018 and 25 January 2019. It is expected that there will continue to be 3 meetings held in every year.

### Training

7. Board Members have certain legal responsibilities and must be conversant with the PPS Regulations and the governance and administration of the Scheme to enable them to exercise their role as a Board Member.
8. Board Members were required to carry-out a training needs analysis which they all completed in 2017. The Board enlisted Barnet Waddingham, the Scheme Actuary, to analyse the training needs and this analysis has then been used by the Pensions Office to produce a training plan for the Board. All necessary training will be delivered by the Pensions Office and external providers as required.
9. Members are expected to keep their knowledge and understanding requirements under review. This will allow the training plan to be reviewed and updated as required to meet the training needs.
10. The Pensions Regulator has created an online learning programme, the Trustee Toolkit, which is aimed at the board members of occupational pension schemes. Members have been provided with the details of the Toolkit and are expected to undertake all 7 training modules.
11. The Pensions Office arranged and provided training presentations to aid the Board in their knowledge and understanding.

Training Topic	Training Content	Delivered by	Board Meeting
<b>Police Pension Schemes: An Overview</b>	Scheme benefits & Overview	The Pensions Office	June 2018
<b>Local Pension Boards: an overview of legislation and expectation</b>	Expectations of Local Pension Boards & the Scheme Advisory Board	The Pensions Regulator	October 2018
<b>Procurement Training</b>	Overview of the procurement process & procurement of pension software	COL Procurement Team & Pensions Office	January 2019

### Annual Schedule of Events

12. In order that the Board is able to monitor and oversee the administration of the Police Pension Scheme an Annual Schedule of Events to illustrate the tasks carried out by the Pensions Office, their deadlines and the actual completion dates of each task is maintained. The Schedule is updated as required and is a standing agenda item for each Board meeting.

### Risk Register

13. A risk register has been created to cover the risks in respect of the City of London Police Pension Scheme. The Register is a standing agenda item for each Board meeting and means that potential risks are continually assessed, reviewed and amended or added to or removed from the Register as deemed appropriate. Since April 2018 two additional risks have been added to the register. The additional risks are: Cyber-security and the Data Protection Act 2018 (DPA18) / General Data Protection Regulations (GDPR).

### Documentation and Communication

14. The Board continues to review the working practices of the City of London Police Pensions Office, including all letters and documents issued to members, prospective members, leavers and retirees to ensure optimum clarity as well as accuracy. This work is ongoing and several recommendations have been made in the past twelve months.

### Data Protection Act 2018 (GDPR)

15. On 25 May 2018 General Data Protection Regulations were introduced. Part of the requirement of pension schemes is to clearly communicate data use and retention. To meet this requirement, the Scheme Manager of City of London Police Pension Scheme must issue a privacy statement to scheme members.
16. The Pensions Office has been provided with a copy of the Police Force's generic privacy statement which the Scheme Manager has now confirmed covers the Force's obligation adequately. A copy of the privacy statement will be included with the annual benefit statement that is issued to all serving Police Officers by the Pensions Office. A copy of the privacy statement will also be sent separately to all retired and deferred officers.

### Breaches of Data Security (Information Commissioner's Office (ICO) GDPR)

17. There were no known breaches during the year

### Breaches of Pension Law (The Pensions Regulator (TPR) code of practice)

18. There were no known breaches during the year

### Insurance and Indemnities

19. The Information Commissioner has the power to impose civil penalties under various provisions of the Data Protection Act 2018 (DPA). The penalties lie against the relevant Data Controller responsible for the breach, but Members of the Board were concerned they could have a personal liability because of the nature of the Board.
20. Utilising powers in the Local Authorities (Indemnities for Members and Officers) Order 2004 and in the Localism Act 2011, and utilising City's Cash where necessary, the City Corporation resolved to indemnify Members and officers, including former officers, and serving and former police officers, who sit as members of the Board against any personal liability that may arise to pay a civil penalty under the Data Protection Act 2018, to the extent that the City Corporation's insurance policies do not fully cover such liability, and subject to the exclusions and restrictions contained in the 2004 Order.

### Governance

21. The Board is currently assessing its own Terms of Reference to ensure that it continues to comply with the statutory requirements.

### **Conclusions**

22. The Police Pension Board was created with reference to the Public Services Pensions Act 2013 and the Police Pension Scheme Regulations 2015. Since April 2018, the Board has met three times and Members continue to receive training to ensure they are compliant with the legal requirements.
23. The Board continues to review the working practices of the City of London Police Pensions Office and regularly monitors all letters and documents issued to members, prospective members, leavers and retirees. The Board maintains a Risk Register and an approved Breaches Policy.

### **Appendices:**

Appendix A – Board Member attendance record

### **Contact:**

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**Police Pension Board - Board Member Record of Attendance**

	<b>30/05/2018</b>	<b>3/10/2018</b>	<b>25/01/2019</b>
Alderman Ian Luder	X	X	
Alexander Barr	X	X	X
Helen Isaac		X	
Davina Plummer <sup>(i)</sup>		N/A	N/A
Kieron Sharp <sup>(i)</sup>		N/A	N/A
John Todd	X	X	X
Philip Hodgson <sup>(ii)</sup>	N/A	X	
Timothy Parsons <sup>(ii)</sup>	N/A	X	X

Notes:

- (i) Served on the Board until September 2018
- (ii) Joined the Board in October 2018



<b>Committee:</b>  Police Performance and Resource Management Committee  Police Authority Board	<b>Date:</b>  21 <sup>st</sup> June 2019  11 <sup>th</sup> July 2019
<b>Subject:</b> Revenue and Capital Budget Outturn Report 2018/19	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 50-19	<b>For Information</b>
<b>Report author:</b> Cecilie Booth, Chief Operating and Chief Financial Officer	

## Summary

The original Chief Officer Cash Limited budget at the start of the year was £66.2m. A further £1.9m was advanced from Business Rates Premium (BPR), providing a final budget of £68.1m. The final outturn position shows a budget deficit of £449,000, funded from Police General Reserves (£226,000) and Proceeds Of Crime Act (POCA) reserves (£223,000). The outturn position is broadly in line with the Quarter 3 report, and includes in-year budget mitigations of £3.1m (breakdown shown in table 3 below)

The main reason for the budget deficit is that the original budget significantly understated the pay and overtime budget, as well as double counting a £4.5m grant.

To address the budget shortfall in the final quarter of 2018/19, budget mitigations were put in place including restrictions on recruitment, overtime and non-essential non-pay expenditure.

## Recommendation

Members are asked to note the report.

## Main Report

### Chief Officer Cash Limited Budget

1. The approved Chief Officer Cash Limited budget at the start of the year was £66.2m. At Quarter 3 (Q3), the forecast outturn position was a budget deficit of £5.4m, to be funded from planned budget mitigations (£3.1m), Business Rates Premium (£1.9m) and reserves. A recruitment freeze and a freeze on non-essential expenditure was introduced in the final quarter of 2018/19, which delivered the required savings of £3.1m. The residual deficit of £449,000 was funded from reserves. The final outturn position, after budget mitigations, is shown in Table 1 below:

**Table 1**

<b>Police 18/19 Outturn Summary</b>	
	<b>£'000</b>
Final Budget before BRP funding	66,194
Addition BRP funding	1,900
Supplementary Revenue Projects (SRP)	6,045
<b>Final Police Budget for 18/19 (a)</b>	<b>74,139</b>
Actual Police Spend	68,474
Net SRP Spend	6,057
Tactical Firearms reserve transfer	57
<b>Final Police Spend (b)</b>	<b>74,588</b>
<b>Residual Police Budget Deficit (b-a)</b>	<b>449</b>
<b>Deficit funded by:</b>	
Police General Reserve	226
POCA	223
<b>Total</b>	<b>449</b>

2. The main reason for the budget deficit was that the original budget significantly understated the pay budget, and in particular overtime. The pressure on the pay budget was initially masked by a £4.5m grant for the National & International Capital City grant, which was also double-counted as income. The full impact of these reasons and some other minor errors and omissions were only fully revealed during the closedown process.
3. The Force has four operational directorates (Crime, Economic Crime, Intelligence and Information and Uniform Policing) and one support Directorate (Business Support). The outturn position is summarised below in Table 2. Further details can be found in Appendix 1.

**Table 2**

	Original Budget £m	Final Budget £m	Outturn £m	Variance £m
<b>Total Pay</b>	<b>91.1</b>	<b>92.8</b>	<b>97.8</b>	<b>(5.0)</b>
<b>Non-Pay</b>	<b>33.4</b>	<b>48.4</b>	<b>44.6</b>	<b>3.8</b>
<b>Total Expenditure</b>	<b>124.5</b>	<b>141.2</b>	<b>142.4</b>	<b>(1.2)</b>
<b>Total Income</b>	<b>(55.3)</b>	<b>(61.4)</b>	<b>(62.2)</b>	<b>0.8</b>
<b>Funding</b>	<b>(61.1)</b>	<b>(74.1)</b>	<b>(74.1)</b>	<b>0.0</b>
<b>Underlying Deficit</b>	<b>8.1</b>	<b>5.7</b>	<b>6.1</b>	<b>(0.4)</b>
Use of reserves	(3.5)	(5.7)	(6.1)	0.4
<b>Deficit</b>	<b>4.6</b>	<b>(0.0)</b>	<b>(0.0)</b>	<b>0.0</b>

4. The “Original Budget” column shows the approved budget. The “Final Budget” column shows the budget required to deliver the current level of service. The outturn position for income and expenditure for the year is compared against the “Final Budget”.

### Revenue

5. Finance Business partners have worked closely with operational directorates to align outturns to budgets by examining all pay and non-pay expenditure, including vacancies, recruitment and the use of agency staff. Funded units have been reviewed to help improve the year end position.
6. At Q3, the year end forecast predicted a budget deficit of £5.4m, predominately due to the errors as mention in the opening summary. The final outturn position aligns closely to the Q3 forecast, and the budget deficit was funded as follows:

- Budget Mitigations                      £3.1m
- Business Rates Premium            £1.9m
- Reserves                                    £0.4m
- Total                                        £5.4m**

7. The budget mitigations were found in the following areas:

**Table 3**

	<b>Mitigations</b>
<b>1</b>	Police Staff Recruitment Freeze
<b>2</b>	Freeze on Police Overtime
<b>3</b>	Agency Staff Rationalisation
<b>4</b>	Freeze on Non Pay Costs
<b>5</b>	Funded Units Recharge Review
<b>6</b>	Additional Income from the Corporate Plan

8. The financial impact of Deferred Weekly Leave (DWL) and Time off In Lieu (TOIL) was assessed in the final quarter. TOIL was fully paid up until 31 March, and outstanding DWL has been calculated. It should be noted that there is currently no financial impact relating to outstanding DWL, it is identified for accounting purposes only.

### Directorate Outturn:

9. Table 4 below shows directorate outturn breakdown

**Table 4**

Directorate	Final 18/19 Budget	Outturn	Variance
BSD	28,839,698	27,071,872	1,767,826
Crime	12,020,000	10,857,347	1,162,653
ECD – Funded Units	2,100,000	1,717,411	382,589
ECD	8,450,350	7,317,140	1,133,210
I&I	10,635,000	11,919,526	(1,284,526)
UPD	12,094,000	15,255,752	(3,161,752)
<b>Grand Total</b>	<b>74,139,048</b>	<b>74,139,048</b>	<b>0</b>

### Narrative:

#### a. BSD

Underspend of £1,767,839 due to:

- BSD is the receiving directorate for a range of funding sources for the CoLP. Income and expenditure wasn't fully re-allocated to the appropriate directorates as part of the closedown process, so the underspend in BSD offset overspends in other directorates.

#### b. Crime

Underspend of £1,162,653 due to:

- Vacancies throughout the year, and as part of the managed recruitment freeze.
- The underspend on staffing was partly offset by an overspend on overtime to cover vacancies, and for response to major incidents;
- Non-pay savings in line with the expenditure freeze;
- Additional Income

#### c. Economic Crime

Underspend of £1,515,799 due to:

- Vacancies and maximising recharges to funded units. Underspends in the core funded units were mainly due to vacancies throughout the year.
- Other government grants of £2m funded activity in the Economic Crime Victim Care Unit, the Overseas Anti-Corruption Unit and the Police Intellectual Property Crime Unit and £6m from industry bodies funded work in the

Insurance Fraud Enforcement Team, the Dedicated Card and Payment Crime Unit and the Lloyds Partnership. The Economic Crime Academy received £1.2m delivering training over the course of the year.

#### **d. Information & Intelligence**

Overspend of £1,284,526 due to:

- Direct staffing costs due to underfunding of establishment posts, in particular for the 20 new posts approved by members without the allocation of funding. The main pressures were within Command Hub, Duties Office, Operation & Emergency planning Office and Surveillance.
- Overtime - the Command Hub incurred the most significant overtime. There is a direct correlation between overtime and vacancies both in number of officers and specific experience. The Command hub in particular faced this challenge during the year.
- Pressures were mitigated by freeze on non-pay expenditure towards the end of the year and higher than expected income (mainly Front Line services) from sale of seized vehicles.

#### **e. Uniformed Police**

Overspend of £3,161,752 due to:

- Mainly staffing related. Overtime spend was £1.2m against a budget of £0.3m. The units with the most significant spends are the Support Group and Tactical Firearms Group.
- Non pay overspend was mainly due to hiring of premises for various policing operations including impounded / seized vehicles. The overall non-pay overspend was mitigated by higher than budget income from various government grants including Counter Terrorism (CT) grant and Transport for London (TFL) grants.

### **Workforce**

10. The workforce / pay budget makes up 74% of the overall budget. There has been some fluctuations in the workforce over the year, as shown in Table 5 below. Table 5 below provides payroll numbers only, and does not fully reflect the establishment including vacancies.

**Table 5**

FTE's				Headcount			
Month	Officers	Staff	Total	Month	Officers	Staff	Total
April	705	446	1,151	April	718	459	1,177
May	710	444	1,154	May	729	461	1,190
June	725	442	1,167	June	738	455	1,193
July	734	451	1,185	July	745	466	1,211
August	733	453	1,186	August	744	466	1,210
September	732	452	1,184	September	744	466	1,210
October	726	445	1,171	October	736	459	1,195
November	729	443	1,172	November	739	458	1,197
December	745	441	1,186	December	756	453	1,209
January	748	437	1,185	January	761	453	1,214
February	742	435	1,177	February	755	446	1,201
March	742	433	1,175	March	751	445	1,196
<b>Average</b>	<b>731</b>	<b>443</b>	<b>1,174</b>	<b>Average</b>	<b>743</b>	<b>457</b>	<b>1,200</b>

**Overtime**

11. There is a direct correlation between holding vacancies and increased overtime expenditure. The overtime outturn position in 2018/19 is £3.2m against an original budget of £0.4 and a revised budget of £1.6m.
12. There was a reduction in overtime worked in January, but the trend is similar to previous years, as illustrated in Charts 1 and 2 below:

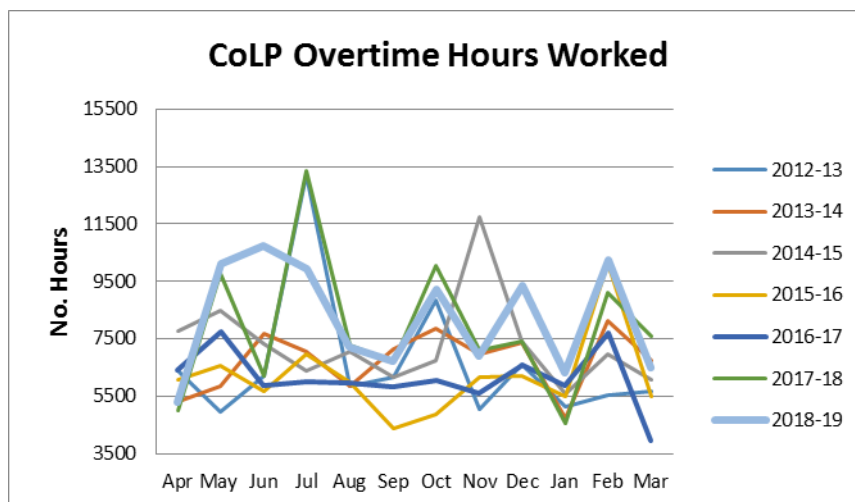
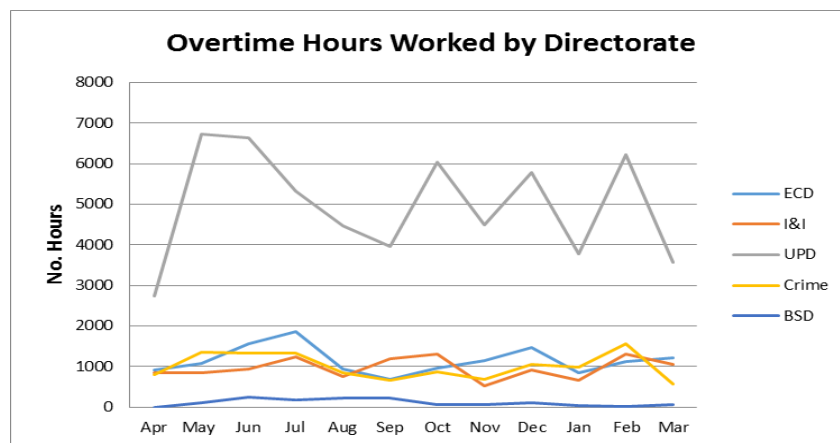
**Chart 1**

Chart 2 shows overtime worked in 2018/19 per directorate:

**Chart 2**



13. As illustrated above there was a reduction in overtime worked in UPD, Crime and BSD since the instruction to reduce overtime was issued in November / December 2018. However, there was an increase in overtime in I&I and ECD. The reason for this increase in the final quarter of the year is:

I&I – Command Hub and surveillance caused the spike in overtime during January / February.

ECD – Nearly all overtime is charged to funded units, some is related to Action Fraud.

Events Policing – Operational directorates involved in policing two Royal Weddings, Donald Trump visit in 2018 and various demonstrations.

### **Non-pay**

14. Budget mitigations realised non-pay savings in the region of £419,000 and additional income and contributions of £641,000 (See Table 2), totalling non-pay savings of £1.06m.

### **Sources of Funding and Income**

15. The City of London Police receives funding and income from a range of sources. Core Funding is provided from the Home Office and the Corporation of London as shown in Table 6 below:

**Table 6**

<b>Funded By:</b>	<b>Amount (£'000)</b>
HO Core Grant	-55,900
Business Rate Premium	-8,800
Additional BRP	-1,900
HO Ctax levy grant	-900
CoL IT contribution	-1,100
Contribution to Capital	-1,000
Contribution from Action Fraud	2,100
SRP Budget	-6,057
Apprenticeship Levy	-100
Misc	-500
<b>Total Funding</b>	<b>-74,157</b>

Action Fraud	-2,180
General Reserve	-3,726
POCA	-223
<b>Reserves</b>	<b>-6,130</b>

Income is received for Force *specific* matters as shown in Table 7 below:

**Table 7**

<b>Name of Grant</b>	<b>Funding Provider</b>	<b>Amount Received in 2018/19 £</b>
Counter Terrorism Policing Grant	Home Office	6,230,000
Firearms Uplift	Mayor's Office for Policing and Crime	280,000
London Safety Camera Partnership	TFL	260,000
Tower Bridge	CoL	90,000
Transport for London: PCVU	TFL	310,000
Transport for London: SSA Contract	TFL	1,520,000
Insurance Fraud Enforcement Department	Association of British Insurers	3,600,000
National Lead Force	Home Office	2,500,000
Economic Crime Victim Care Unit	Mayor's Office for Policing & Crime	210,000
Regional Organised Crime Unit Coordinator Salary	Home Office	80,000
Action Fraud/National Fraud Intelligence Bureau	Home Office	4,000,000
Action Fraud Managed Services	Home Office	5,500,000
Intellectual Property Crime Investigation Unit	Intellectual Property Office	



		1,590,000
Overseas Anti-Corruption Unit	Department for International Development	180,000
Dedicated Cheque and Plastic Card Unit	UK Payments Administration Ltd	2,330,000
National Cyber Security Programme	Home Office	2,090,000
National Cyber Security Programme	Home Office	1,290,000
National Cyber Security Programme	Home Office	600,000
National Cyber Security Programme	Home Office	1,310,000
Police Transformation Fund - National to Local Fraud & Cyber Data Sharing	Home Office	1,220,000
Police Transformation Fund - Economic Crime Capability Grant	Home Office	1,060,000
Police Pension Grant	Home Office	19,530,000
Cyber Griffin	City Cash	110,000
Late Night Levy	Via Corporation	320,000
Fees and Charges	Miscellaneous	4,400,000
Other	Miscellaneous	1,600,000
<b>TOTAL</b>		<b>62,210,000</b>

### Accounts Receivable (AR)

16. The value of Debtors at Year end was £2,077,990. (February £893,607). Debt over 3 months old was £246,000 (February £681,000). This greatly improved position on debts over three months old is a result of a review of outstanding debtors.

17. Debt less than three months old increased by £1,618,000, which was largely due to issuing a number of year-end invoices as well as more timely invoicing in general.

**Table 8 - Aged Debt Profile**

Age of Debt	No of Invoices	Value (£)	Change on Previous Month (Invoices)	Change on Previous Month (Value)
Less than 1 month	43	1,752,757	+ 23	1,607,773
1 – 2 Months	5	14,054	+3	10,821
2 – 3 Months	3	65,000	(-4)	801
3 months – 1 year	12	143,163	+1	(180,401)
Over 1 year	13	103,016	(-22)	(254,611)
<b>TOTAL</b>	<b>76</b>	<b>2,077,990</b>	<b>1</b>	<b>1,184,383</b>

### Summary of Movements in Month:

Number of Invoices Paid	(17)	(£195,269)
New Invoices Raised	44	£1,760,379
Credit Notes Issued	(10)	(£372,276)
Debts Written Off	(16)	(£8,451)

**Table 9 - Aged Debt per Directorate**

Directorate	< 1 month £	1-2 months £	2-3 months £	3 months + £	Total £
BSD/Central	227,885	-	61,767	161,538	451,190
Crime	190,776	-	-	-	190,776
ECD	530,633	-	15	82,669	613,317
I&I	85,084	-	-	-	85,084
UPD	718,379	14,054	3,218	1,972	737,623

### Accounts payable (AP)

18. The CoLP AP team processed 10,205 invoices with a total value £42.2m during 2018/19. The number of POs raised was 6,927 and number of goods receipted was 8,647. The corporate PO compliance target is 97%, CoLP performance was 94% for the year.
19. Due to staff shortages and operational problems, a backlog was building up within the AP team during the first half of the financial year. The backlog was identified and ring fenced in two service areas; the service request inbox and un-invoiced receipts. Work on clearing the backlog resulted in a significant service improvement, and much improved performance against the corporate target of paying invoices within 30 days (small suppliers within 10 days) as shown in Table 10 below:

**Table 10 – Payment Performance CoLP**

Month	30 Days P.O.T	Total Nos Invoices	10 Days P.O.T	Total Nos Invoices
Feb-19	71%	585	71%	269
Mar-19	85%	495	79%	262
Apr-19	87%	398	81%	149

20. Table 10 illustrates the steady improvement in payments of invoices between February and April 2019. However, despite the improvement shown, it should be noted that there is still an element of backlog and further work is required to maintain current service levels and improve performance going forward. The aim is to achieve the 97% corporate target for payment of invoices on time.

### Brexit

21. National Policing has identified the potential risk of public disorder during the Brexit period, which added further pressures on the revenue budget. Brexit related protests have been planned for central London which could enter the City

footprint. Any sizeable protest within the City footprint that led to disorder would require a regional mobilisation response. This would mean a large number of Police Support Units within the City dealing with protest.

22. The Corporation of London made funds available to meet Brexit preparation costs, and CoLP secured funding of £44,000 for upfront investment and contingency plans. £9,000 was spent in 2018/19, and the remaining £35,000 has been allocated to 2019/20. Funding may also be available from the Home Office, but no such funding was available during 2018/19.
23. A new cost centre has been established to monitor costs, and overall expenditure will be closely monitored.

### **Capital Programme and Supplementary Revenue Projects (SRP)**

24. The CoLP Capital and SRP programme includes the projects shown in Table 11. Project management procedures ensure that projects cannot overspend without prior approval.

**Table 11**

<b>Core Project</b>	<b>Approval Amount £m</b>	<b>Spend to date £m</b>	<b>Future years £m</b>
Emergency Services Network (ESN)	1.821	1.333	0.488
Economic Crime Capability Development	0.074	-	0.074
HR Time Management & e-Expenses	0.426	0.356	0.070
ICT Support to CCCI	3.360	3.333	0.027
Police Telephony Upgrade	0.493	0.409	0.084
Ring of Steel Compliance (iMS-DRS)	2.446	2.118	0.328
Secure City Programme Management (incorporating both One Safe City and Secure City Management)	0.453	0.321	0.132
Technology Infrastructure	0.231	0.133	0.098
Wide Area Network (WAN) Refresh - Police Recharge	1.445	1.071	0.374
<b>Grand Total</b>	<b>10.749</b>	<b>9.074</b>	<b>1.675</b>

25. The capital programme has provision for the Accommodation Project which is directly managed by the Corporation of London. Activity to date is illustrated in Table 12 below:

**Table 12**

<b>Core Project</b>	<b>Approval Amount £m</b>	<b>Spend to date £m</b>	<b>Future years £m</b>
Accommodation Project (49 individual projects)	56.372	40.774	15.598

## Emergency Services Network Project

26. The ESN team has identified that they need in the region of £8m, of which £1.821m has been approved so far. The Home Office has already delayed switching off the existing system by three years to 2022 and very recently the National Audit Office (NAO) has raised doubt about whether the project will be ready by then.
27. It has been requested that an underspend of £0.488m against the approved £1.821m budget be carried forward to 2019/20, with some changes to the expenditure categories.

## Action Fraud: Action and Know Fraud

28. Members approved a Deed of Variation to the Managed Service Contract enabling a partial service Go Live in October 2018. The remaining functionality is being delivered through Four Maintenance Releases starting in June 2019. Mobilisation expenditure was £1.4m following additional support from the Home Office from within the National Cyber Security Programme. This resulted in £1.7m being carried forward into 2019/20.

## Use of Reserves

29. Table 13 below shows a summary of the Police reserves.
30. The Police General Reserve, the Transformation Reserve and the Action Fraud reserve were all fully utilised to match expenditure incurred during 2018/19.

**Table 13**

Police Funds to 31st March 2019	2018/19 Opening Balance £m	2018/19 Outturn £m	2018/19 Additional net Proceeds in-year £m	2018/19 Closing Balance £m
General	(3.73)	3.73	0.00	0.00
POCA	(2.93)	0.86	(0.45)	(2.53)
Action Fraud	(3.18)	2.18	(0.71)	(1.71)
Transformational Funding	(0.10)	0.04	0.00	(0.06)
Total Police Funds	(9.94)	6.80	(1.16)	(4.29)

## Appendix 1 – Outturn Detail

### Contacts:

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## Forecast - Detailed

	Original Budget £m	Final Budget £m	Outturn £m	Variance £m
<b>Pay</b>				
Officers – net	47.9	46.2	47.9	(1.7)
Staff – net	21.2	22.5	22.2	0.3
Overtime	0.4	1.6	3.2	(1.7)
Agency	0.0	0.8	2.1	(1.3)
Pensions Contrib.	19.6	19.6	20.4	(0.8)
Other	2.0	2.1	2.0	0.1
<b>Total Pay</b>	<b>91.1</b>	<b>92.8</b>	<b>97.8</b>	<b>(5.0)</b>
<b>Non-Pay</b>	<b>33.4</b>	<b>48.4</b>	<b>44.6</b>	<b>3.8</b>
<b>Total Expenditure</b>	<b>124.5</b>	<b>141.2</b>	<b>142.4</b>	<b>(1.2)</b>
<b>Income</b>				
Specific Grant	(41.2)	(47.2)	(46.2)	(0.9)
Partnership	(11.1)	(11.5)	(11.5)	(0.1)
Fees & Charges	(3.0)	(2.7)	(4.4)	1.8
<b>Total Income</b>	<b>(55.3)</b>	<b>(61.4)</b>	<b>(62.2)</b>	<b>0.8</b>
<b>Funding</b>	<b>(61.1)</b>	<b>(74.1)</b>	<b>(74.1)</b>	<b>0.0</b>
<b>Underlying Deficit</b>	<b>8.1</b>	<b>5.7</b>	<b>6.1</b>	<b>(0.4)</b>
Use of reserves	(3.5)	(5.7)	(6.1)	0.4
<b>Revised Deficit (pre-mitigation)</b>	<b>4.6</b>	<b>(0.0)</b>	<b>(0.0)</b>	<b>0.0</b>

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<b>Committee:</b>  Police Performance and Resource Management Committee  Police Authority Board	<b>Date:</b>  21 <sup>st</sup> June 2019  11 <sup>th</sup> July 2019
<b>Subject:</b> Budget Monitoring Month 2 -2019/20	<b>Public</b>
<b>Report of:</b> Commissioner of Police Pol 51-19	<b>For Information</b>
<b>Report author:</b> Cecilie Booth, Chief Operating and Chief Financial Officer	

## Summary

The Chief Officer Cash Limited budget at the start of the year is £72.7m. This currently excludes funding for the additional 67 growth bid posts which will be adjusted in year.

This report outlines the financial position up to the end of May 2019 (Month 2). It is too soon in the financial year to provide a meaningful projected outturn position, however, the purpose of this additional monitoring report is to provide Members with assurance that a balanced budget has been set, key financial pressures have been identified and a comprehensive system of monitoring is in place. A full Quarter 1 report will be presented to Members in September 2019.

## Recommendation

Members are asked to note the report.

## Main Report

### Chief Officer Cash Limited Budget

1. The Force has four operational directorates (Crime, Economic Crime (ECD), Intelligence and Information (I&I) and Uniform Policing (UPD) and one support Directorate, Business Support Directorate (BSD). The forecast is summarised below in Table 1. Details of the Revised Budget and forecast can be found in Appendix 1.

**Table 1**

	Original Budget £m	Actual (M2 YTD) £m	Forecast £m	Variance £m
Total Pay	101.4	11.8	101.4	0.0
Non-Pay	38.0	7.9	38.0	0.0
Total Expenditure	139.3	19.7	139.3	0.0
Total Income	(66.6)	23.4	(66.6)	0.0
Funding	(72.7)	(72.7)	(72.7)	0.0
Total	0.0	0.0	0.0	0.0

Some sources of income and funding are received close to year end, the forecast column reflects this.

### Revenue

2. Finance Business partners are working closely with operational directorates to ensure all pay and non-pay expenditure is captured correctly against the approved budgets, including monitoring of vacancies, recruitment and the use of agency staff. A detailed review of core funding and funded units is also being undertaken, to ensure a consistent recharging approach is applied.
3. At M2, the forecast to year end is showing expenditure in line with the budget and no major variances. However, it should be noted that month 2 is a very early stage of the monitoring process.

### In-year budget mitigations

4. The following budget mitigations are required in-year:

**Pay** - £4.7m (£2m budget mitigations, £1.7m vacancy factor and £1m Transform)

**Non-pay** - £1.6m (£1m budget mitigations and £0.6m Transform)



5. To achieve the required savings during the year, it is essential that a plan is in place, and that the plan is monitored closely.

**Pay savings** will be found through workforce and vacancy management in core funded posts. The monthly pay savings required is £390,000 (81 posts, officers / staff), however, this is subject to further work by the Police and Police Authority Treasurer.

**Non-pay savings** of £1.6m have been identified in the following areas:

Corporate Plan income	£300,000
Facilities Management	£500,000
Seized assets disposal	£300,000
Agency Staff	<u>£500,000</u>
Total	<u>£1,600,000</u>

6. It is highly unlikely that required services can be maintained with 81 vacant posts. If and when additional non-pay savings or additional income / funding are achieved, the plan will be revised.

### **Additional budget pressures**

7. The Employer's contribution to Police Pension increased from 21.3% to 24.2% in 2018/19 with a further increase to 31% for 2019/20. This increase in contribution provides an additional budget pressure of £2.5m (between core and funded posts). At this stage it is unclear on the extent of central grant provision for this increase, and this will be reported on once we have greater certainty. It has not yet been determined how this additional pressure will be funded.

### **Directorate breakdown**

8. Table 2 below shows projected directorate outturn.
9. The YTD actuals for ECD and BSD appear high at month 2, this will reduce significantly once income is received later in the year.

**Table 2**

Directorate	Original 19/20 Budget	M2 Actual	Projected Outturn	Variance
BSD	24,223,000	14,290,134	24,223,000	-
Crime	12,512,000	2,024,427	12,512,000	-
ECD	2,661,000	21,208,867	2,661,000	-
ECD - Funded Units	6,350,000	890,612	6,350,000	-
I&I	11,428,000	1,752,063	11,428,000	-
UPD	15,555,000	2,878,824	15,555,000	-
<b>Grand Total</b>	<b>72,729,000</b>	<b>43,044,926</b>	<b>72,729,000</b>	<b>-</b>

## Workforce

10. Table 3 shows the overall CoLP Establishment as at May 2019, with a further breakdown of where the additional posts sit and how funded in table 3.1.

**Table 3**

Officer/Staff		Jan 2019	Total
Officer	756	23	779
Staff	451	45.1	496.1
<b>Grand Total</b>	<b>1207</b>	<b>68.1</b>	<b>1,275.1</b>

**Table 3.1**

Officers	Staff	Funding
	Change Portfolio Office x2	Grant
	Facilities Management x2.55	Accommodation Program
	PSD x1	ECD Action Fraud
	HR x1	Grant (HAC)
Economic Capability Development x7	Economic Capability Development x1	Home Office
OACU x1	OACU x1	Department for International Development
NCSP Protect Funding x2	NCSP Protect Funding x7	Home Office
National Fraud Academy x1		Traded Income
	ECVCU x18	MOPAC
	IFED x2	Association of British Insurers
	Lloyds Partnership x1	Lloyds Bank
NFIB x1	NFIB x1	Home Office
	NCSP Out of Hours Operation x1	Home Office
	National Lead Force x0.55	Home Office
	Information Management x2	Grant (DBS) x1 and Corporation x1
Licensing x1		Grant (Late Night Levy)
Management Team x1		Grant (Direct Entry Superintendent)
Project Servator x6	Project Servator x3	Grant (Home Office)
Cyber Crime Unit (Cyber Griffin) x3		Cyber Griffin
	AOJ x1	NLF Funding
<b>Total = 23</b>	<b>Total = 45.1</b>	

11. As of 31 May 2019, the CoLP establishment is 1,275.12, comprising 779.0 officers and 496.1 staff. Growth due to additional external funding does not affect core funded posts.

12. With approval given for 67 additional posts at Resource Allocation Sub Committee and Policy and Resources Committee on the 2<sup>nd</sup> May the Directorate breakdown is shown in Table 4 below showing the additionality to the overall establishment figures:

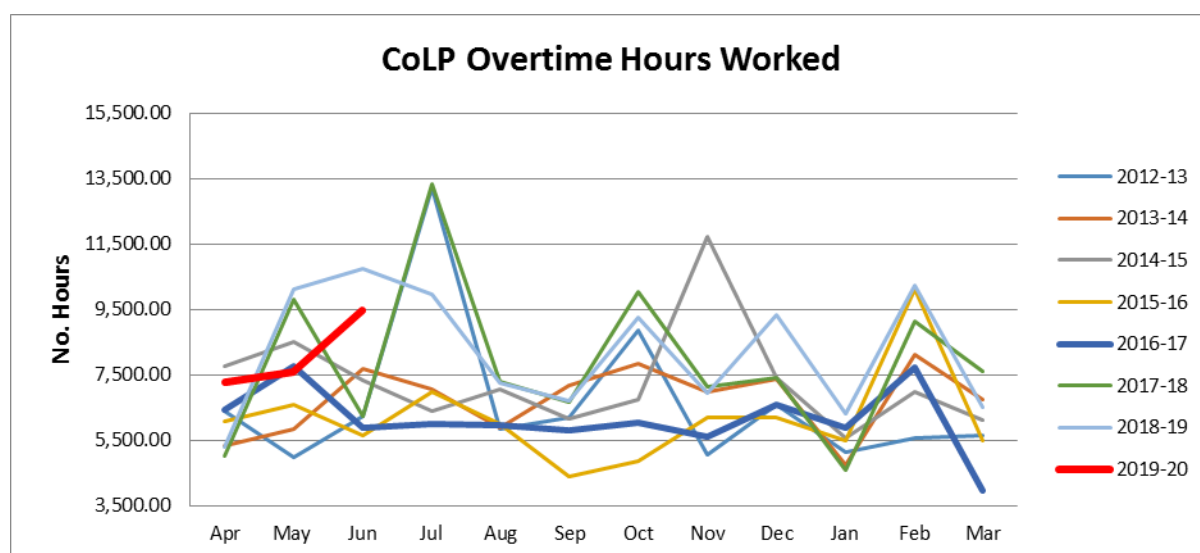
**Table 4**

Officer/Staff	BSD	Crime	ECD	I and I	UPD	Grand Total
Officer	36.00	138.00	196.00	95.00	375.00	840.00
Staff	136.86	69.00	162.16	102.31	31.79	502.12
<b>Grand Total</b>	<b>172.86</b>	<b>207.00</b>	<b>358.16</b>	<b>197.31</b>	<b>406.79</b>	<b>1,342.12</b>

## Overtime

13. In 2018/19, expenditure on overtime was £3.2m. The 2019/20 overtime budget is £1.6m, so significantly lower than the previous year's outturn position. At the February meeting of the Performance and Resource Management Committee, Members sought reassurance that overtime spend was being actively monitored and mitigated. A revised overtime policy was introduced in 2019/20 which includes devolved overtime budgets and more transparent monitoring and forecasting. Clear management lines have been established for the authorisation of planned and reactive overtime. Chart 1 below shows overtime worked in April and May 2019.

**Chart 1**



14. There is a direct correlation between vacancies and overtime. While a significant number of vacancies are held, it is highly likely that overtime will be required.

15. Up to 31 May 2019, the cost of overtime totals £488,000, which relates to overtime worked in April and part of May.

16. The main reasons for overtime are:

- Covering for vacant posts (backfilling / Business as Usual (BAU))
- Extinction Rebellion protest over the Easter period
- Pan London Brexit protest
- Bank of England armed escorts
- CID
- Op BENBOW

17. Some of this overtime will be related to funded units, however, expenditure in the first two months of the year is high and this will place further pressure on the revenue budget. It is expected that the need for backfilling and BAU will reduce as vacancies are filled, however, it is difficult to predict requirements relating to future (known and unknown) policing requirements.

## Sources of Funding and Income

18. The City of London Police receives funding and income from a range of sources. A breakdown of Core Funding is shown in Table 5 below. Some funding is received towards the end of the financial year.

**Table 5**

<b>Funded By:</b>	<b>Amount (£'000)</b>
Core Grant	<b>-57,100</b>
Premium	<b>-13,000</b>
HO Ctax levy grant	<b>-2,700</b>
<b>Total Funding</b>	<b>-72,800</b>

19. Income is received at various stages of the financial year, and activity will be monitored and reported upon as part of the usual budget monitoring process. A fuller assessment of the security of income streams as requested by Members will be undertaken as part of the MTFP refresh later in the year and reported to Members. The 2018/19 Outturn report also on the agenda at this Committee/ Board sets out a breakdown of the level of income received last year by income stream as requested by Members. Updates will be provided on the 2019/20 position throughout the year.

## Accounts Receivable

20. The value of Debtors as at 31 May is £1,035,938 (2018/19 year end £2,077,990). Debt over 3 months old was £123,849 (2018/19 year end £246,000). A breakdown of Aged Debt is shown in Table 6 below.

**Table 6**

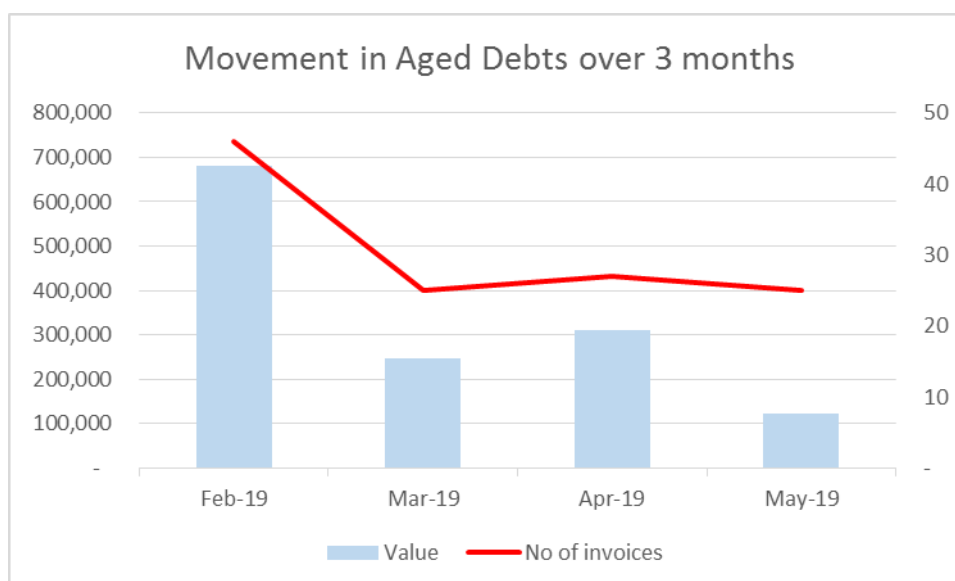
<b>Age of Debt</b>	<b>No of Invoices</b>	<b>Value (£)</b>	<b>Change on Previous Month (Invoices)</b>	<b>Change on Previous Month (Value)</b>
Less than 1 month	6	184,578	(37)	(1,568,179)
1 – 2 Months	2	11,181	(3)	(2,873)
2 – 3 Months	8	716,330	5	651,330
3 months – 1 year	13	99,182	1	(43,980)
Over 1 year	12	24,666	(1)	(78,350)
<b>TOTAL</b>	<b>41</b>	<b>1,035,938</b>	<b>(35)</b>	<b>(1,042,052)</b>

Number of Invoices Paid	(38)	(£1,109,288)
New Invoices Raised	8	£195,759
Credit Notes Issued	(5)	(£128,524)
Debts Written Off	(-)	

**Table 7**

Directorate	< 1 month £	1-2 months £	2-3months £	3 months + £	Total £
BSD/Central	11,000	7,403	211,479	114,643	344,525
Crime	-	-	-	-	-
ECD	168,053	3,778	1,050	3,667	176,548
I&I	5,525	-	40,000	-	45,525
UPD	-	-	463,801	5,539	469,340

**Chart 2**



### Accounts payable

21. Table 8 below illustrates a 12 month rolling total of City of London Police PO compliance performance. Compliance is measured by the number of invoices received where a Purchase Order (PO) has been raised in advance. The corporate compliance target is 97%. CoLP average compliance for the 2018/19 year is 94%. Performance in April 2019 is 97%, so in line with the corporate target.

**Table 8**

Month	No of Compliant Invoices	Total No of Invoices	%
May-18	522	554	94%
Jun-18	414	445	93%
Jul-18	516	561	92%
Aug-18	589	622	95%

Sep-18	491	514	96%
Oct-18	589	637	92%
Nov-18	642	662	97%
Dec-18	545	572	95%
Jan-19	619	687	90%
Feb-19	566	587	96%
Mar-19	686	713	96%
Apr-19	545	526	97%
<b>Total to Date</b>	<b>6,724</b>	<b>7,080</b>	<b>94%</b>

22. May 2019 performance is not yet available, however, it should be noted that the financial system (CBIS) was unavailable for 8 working days, which will have an adverse impact on performance, both for the month and in dealing with backlogs.

### **Brexit**

23. National Policing has identified potential risk of public disorder during the Brexit period, which added further pressures on the revenue budget. Brexit protest have been planned for central London which could enter the city footprint. Any sizeable protest within the City footprint that led to disorder would require a regional mobilisation response. This would mean a large number of Police Support Units within the City dealing with protest.

24. The Corporation of London made funds available to meet Brexit preparation costs, and CoLP secured funding of £44,000 for upfront investment and contingency plans. £9,000 was spent in 2018/19, and the remaining £35,000 has been allocated to 2019/20. Funding may also be available from the Home Office, however no such funding was available during 2018/19.

25. Overtime relating to Brexit in the first two months of 2019/20 is £22,000.

### **Action Fraud: Action and Know Fraud**

26. Progress is being made against the agreed Home Office Grant deliverables. In addition:

- At the Projects Sub-Committee on 29 May 2019 Members requested a follow-up report for Action and Know Fraud – Client Team to include (1) VFM of Programme Team (2) review of risks/rewards of re-tasking programme team / new ways of working
- A Business Case to further evidence and support service commercialisation is being drafted for consideration by the Commissioner and Chamberlain Joint Commercial Board in June 2019 with the aim of including in July 2019 Member reporting.

### **Capital Programme and Supplementary Revenue Projects (SRP)**

27. Capital expenditure usually spans over several years. Capital Programme monitoring for 2019/20 has not yet commenced, the capital position will therefore be covered in more detail in the Q1 report at the September 2019 Police Authority Board meeting.

### **Emergency Services Network Project**

28. Underspends of £0.488m against the approved budget have been carried forward with some changes to the expenditure categories. The future of this project will be considered in more detail during 2019/20.

## Use of Reserves

29. Table 9 below shows a summary of the Police reserves.

30. The Police General Reserve was fully utilised in 2018/19 and drawdowns were made from the Transformation Reserve and the Action Fraud reserve to match expenditure. As per Table 9, remaining reserves are expected to be fully spent by the end of the financial year.

**Table 9**

<b>Forecast Police Reserves to 31st March 2020</b>	<b>2019/20 Opening Balance £m</b>	<b>2019/20 Projected Spend £m</b>	<b>2019/20 Projected closing Balance £m</b>
General	0	0	0
POCA	(2.53)	(2.53)	0
Action Fraud	(1.71)	(1.71)	0
Transformational Funding	(0.06)	(0.06)	0
<b>Total Police Funds</b>	<b>(4.3)</b>	<b>(4.3)</b>	<b>0</b>

## Risk Management

31. Table 10 below identifies the key risks and mitigating controls contained within this report:

**Table 10**

<b>Risk</b>	<b>Risk Mitigation</b>
Major incidents	Early engagement with the Home Office to ensure opportunities for cost recovery are maximised.
Crime Performance / Safety issues	All such issues will be reported to members
Vacancy factor	It will be challenging to maintain acceptable service levels with a vacancy factor of 81. The vacancy factor will be reviewed and revised throughout the year, if and when the financial position improves from additional non-pay savings / additional income. All recruitment is approved by the Strategic Workforce Panel.
Budget mitigations and additional pension pressure	Fortnightly strategy meetings are held with the Commissioner, Town Clerk and Police Authority Policy Officers and Police Authority and Force Finance, reviewing and challenging budget and savings assumptions.
Overtime budget	Enhanced controls have been introduced to manage the overtime budget
Deferred Weekly Leave (DWL)	Accrued DWL has been quantified, however, the build-up of DWL may be subject to unplanned events over the year.

Use of agency staff	Reliance on agency staff has been greatly reduced
Further cost pressures for Action Fraud	Under review and close scrutiny
Capital Programme progress and potential slippage	The Capital Programme will be monitored throughout the year, capital recharges will be undertaken in a timely manner. Preparation of the 2020/21 Capital Programme will commence in the autumn.
Brexit	Expenditure will be monitored closely, and external sources of funding will be explored.
Events policing	Finance Business Partners will work closely with services to ensure chargeable events policing is captured in a timely manner and recharged accordingly.
Vehicle fleet management	A Strategic Fleet Management Group chaired by the Assistant Commissioner has been re-established. A strategic review of the police vehicle fleet will be undertaken

**Appendices-** Appendix 1 – Budget Detail

**Contacts:**

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0207 601 2484,

[Cecilie.Booth@cityoflondon.pnn.police.uk](mailto:Cecilie.Booth@cityoflondon.pnn.police.uk)



## Forecast - Detailed

	Original Budget £m	Actual (M2 YTD) £m	Forecast £m	Variance £m
<b>Pay</b>				
Officers – net	51.8	7.9	51.8	0.0
Staff – net	22.1	3.6	22.1	0.0
Overtime	2.0	0.2	2.0	0.0
Agency	2.9	0.0	2.9	0.0
Pensions Contrib.	2.1	0.1	2.1	0.0
Other	20.4	0.0	20.4	0.0
<b>Total Pay</b>	<b>101.4</b>	<b>11.8</b>	<b>101.4</b>	<b>0.0</b>
<b>Non-Pay</b>	<b>38.0</b>	<b>7.9</b>	<b>38.0</b>	<b>0.0</b>
<b>Total Expenditure</b>	<b>139.3</b>	<b>19.7</b>	<b>139.3</b>	<b>0.0</b>
<b>Income</b>				
Specific Grant	(52.1)	23.8	(52.1)	0.0
Partnership	(11.9)	(0.4)	(11.9)	0.0
Fees & Charges	(2.6)	0.0	(2.6)	0.0
<b>Total Income</b>	<b>(66.6)</b>	<b>23.4</b>	<b>(66.6)</b>	<b>0.0</b>
<b>Funding</b>	<b>(72.7)</b>	<b>(72.7)</b>	<b>(72.7)</b>	<b>0.0</b>
<b>Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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