



City of London Police Authority Board

Date: THURSDAY, 27 OCTOBER 2022
Time: 11.00 am
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members: Deputy James Thomson (Chair)
Tijs Broeke (Deputy Chair)
Caroline Addy
Munsur Ali
Nicholas Bensted-Smith
Alderman Professor Emma Edhem
Helen Fentimen
Alderman Timothy Hailes
Deborah Oliver
Deputy Graham Packham
Dawn Wright
Andrew Lentin (External Member)
Sir Craig Mackey (External Member)
Michael Mitchell (External Member)
Melissa Collett (External Member)

Enquiries: Richard Holt
Richard.Holt@cityoflondon.gov.uk

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https://youtu.be/t2_ul-vDSdk

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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 approve public note and non-public summary of inquorate meeting of the City of London Police Authority Board held on the 27th of September.

For Decision
(Pages 7 - 14)

4. **OUTSTANDING REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 15 - 16)

5. **COMMITTEE MINUTES**

For Information

a) **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 the 26th of September.

For Information
(Pages 17 - 22)

b) **Draft minutes of the Economic and Cyber Crime Committee**

To receive the draft public minutes and non-public summary of the Economic and Cyber Crime Committee meeting held on the 3rd of October.

For Information
(Pages 23 - 28)

6. **CHAIR'S PUBLIC UPDATE**

Report of the Chair.

For Information
(Pages 29 - 32)

7. **COMMISSIONER'S UPDATE**

Report of the Commissioner.

For Information
(Pages 33 - 36)

8. **INDEPENDENT CUSTODY VISITOR ANNUAL REPORT 2022-23**

Report of the Town Clerk.

For Information
(Pages 37 - 48)

9. **APPOINTMENT OF INDEPENDENT CUSTODY VISITORS SCHEME MEMBER SPONSOR**

The Police Authority Board to appoint one of its Members as the Independent Custody Visitors Scheme Member Sponsor.

For Decision

10. **REVIEW OF THE POLICE AUTHORITY**

Report of the Town Clerk.

For Information
(Pages 49 - 90)

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

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

13. **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

14. **NON-PUBLIC MINUTES**

To approve non-public note of inquorate meeting of the City of London Police Authority Board held on the 27th of September.

For Decision
(Pages 91 - 94)

15. **CHAIR'S NON-PUBLIC UPDATE**

The Chair to be heard.

For Information

16. **COMMITTEE MINUTES**

For Information

a) **Draft minutes Professional Standards and Integrity Committee**

To receive the draft non-public minutes of the Professional Standards and Integrity Committee meeting held on the 26th of September.

For Information
(Pages 95 - 98)

b) **Draft minutes Economic and Cyber Crime Committee**

To receive the draft non-public minutes of the Economic and Cyber Crime Committee meeting held on the 3rd of October.

For Information
(Pages 99 - 102)

17. **FRAUD AND CYBER CRIME REPORTING AND ANALYSIS SERVICE
PROGRAMME AND NEW SERVICE**

Report of the Commissioner.

To follow.

For Decision

18. **NPCC CYBER CRIME PORTFOLIO- CYBER CRIME PLAN 2022-23**

Report of the Commissioner.

For Decision
(Pages 103 - 110)

19. **NPCC CYBER CRIME PROGRAMME - BENEFITS EVALUATION 2021-22**

Report of the Commissioner.

For Information
(Pages 111 - 142)

20. **GATEWAY 6- POWER BI- CLOSURE REPORT**

Report of the Commissioner.

For Decision
(Pages 143 - 156)

21. **CITY OF LONDON POLICE RETENTION MEASURES**
Report of the Commissioner.

For Decision
(Pages 157 - 176)

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

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

CONFIDENTIAL

24. **REVIEW OF SPECIAL CONSTABULARY**
Report of the Commissioner.

To be circulated separately.

For Information

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CITY OF LONDON POLICE AUTHORITY BOARD

Tuesday, 27 September 2022

Public note of the inquorate meeting of the City of London Police Authority Board held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Tuesday, 27 September 2022 at 10.00 am

Present

Members:

Deputy James Thomson (Chair)
Alderman Professor Emma Edhem
Deputy Graham Packham
Dawn Wright
Deborah Oliver
Andrew Lentin (External Member)
Michael Mitchell (External Member)
Melissa Collett (External Member)

Officers:

Richard Holt	- Town Clerk's Department
Chandni Tanna	- Town Clerk's Department
Caroline Al-Beyerty	- The Chamberlain
Paul Chadha	- Comptroller and City Solicitor's Department
Alistair Cook	- Head of Police Authority Finance
Alix Newbold	- Director of the Police Authority
Rachael Waldron	- Town Clerk's Department

City of London Police:

Angela McClaren	- Commissioner, City of London Police
Peter O'Doherty	- Assistant Commissioner, City of London Police
Paul Betts	- Assistant Commissioner, City of London Police
Hayley Williams	- City of London Police
Umer Khan	- Commander, City of London Police
Emma Cunningham	- City of London Police
Martin O'Regan	- City of London Police
Paul Adams	- City of London Police
Robert Atkin	- City of London Police
Sanjay Andersen	- City of London Police
Patrick Holdaway	- City of London Police
Claire Cresswell	- City of London Police

A Quorum was not established within five minutes of the scheduled start of the Committee and as result, in accordance with Standing Order 36 (2), the formal meeting was dissolved. Following this Members present agreed to informally consider the items on the agenda.

1. **APOLOGIES**

Apologies were received from the Deputy Chair Tijs Broek, Alderman Timothy Hailes, Nicholas Bensted-Smith, Sir Craig Mackey and Helen Fentimen.

The Chair welcomed the newly appointed External Board Members Melissa Collett and Michael Mitchell to their first meeting of the Board.

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

Deputy James Thomson made a declaration that he served on the Bridge House Estates Board in relation to Item 27.

3. **MINUTES**

The Board considered the draft public minutes and non-public summary of the Police Authority Board meeting held on the 20th of July 2022.

RESOLVED – That the public minutes of the Police Authority Board meeting held on 20th of July be approved as an accurate record.

4. **OUTSTANDING REFERENCES**

The Committee considered a report of the Town Clerk which set out Public Outstanding References from previous meetings of the Committee.

RESOLVED – That report be noted.

5. **DRAFT MINUTES OF THE RESOURCE, RISK & ESTATES COMMITTEE**

The Board received the public minutes and non-public summary of the Resource, Risk & Estates Committee meeting held on the 5th of September.

RESOLVED- That the minutes be noted.

6. **CHAIR'S PUBLIC UPDATE**

The Board received the Chair's public update.

The Chair thanked Officers for their work in supporting the London Bridge operations during the period of national mourning for Her Majesty the Queen and noted that the Police Authority Board Dinner would be rearranged for early 2023. In addition, it was noted that there were, since the last meeting of the Board, a number of serving new ministers in the Government and that the Chair would be writing to each of the relevant ministers accordingly.

RESOLVED- That the update be noted.

7. **COMMISSIONER'S UPDATE**

The Board received a report of the Commissioner on the Commissioner's public update.

Following concerns raised by a Member, Officers provided an update on the operational activity regarding the policing of mobile phone robberies in the City of London. Additionally, Officers confirmed that these operations, when appropriate, were completed in conjunction with colleagues in the Metropolitan Police.

Responding to a query from the Board an update on the number of Action Fraud Call Handlers was provided to the Board. Members noted that the attrition rates meant that there was nearly a hundred percent turnover of staff within a year. Following this observation Officers explained that there were a number of mitigation measures being considered on this matter and that a more in depth update was being provided to the next meeting of the Economic and Cyber Crime Committee on the 3rd October.

RESOLVED- That the report be noted.

8. CITY OF LONDON POLICE BUSINESS PLANNING PROCESS

The Board received a report of the Commissioner on the City of London Police Business Planning.

It was noted that better communication of the Force's Business Plan would assist the Police Authority Board in its role scrutinising the Plan. A Member commented that the Board needed to be appropriately informed if the Force was not on course to meet the timeline targets in the Business Plan.

The Chair commented that business partners needed to be incorporated appropriately in the Business Planning process.

RESOLVED- That the report be noted.

9. Q1 REVENUE AND CAPITAL BUDGET MONITORING 22-23

The Board received a report of the Commissioner on the Q1 Revenue and Capital Budget Monitoring 22-23. The Board were informed of the comments made at the Resource, Risk and Estates Committee.

Following a Board member's query, it was confirmed that the recoding of the £1m budget for the Police Authority to support financial reporting was proceeding well.

It was confirmed, in response to a Board member's question, that the corporate services review would be take forward as a top priority with an update to the Board on its progress within six months. In addition, it was confirmed that the uplift numbers were considered to be achievable.

Officers informed the Board that inflation was, evidently, the biggest risk for the City of London Police's Budget and that the discussions will be held with other police forces to ascertain the appropriate level of inflationary budget assumptions.

RESOLVED- That the report be noted.

10. **CITY OF LONDON POLICE RISK REGISTER UPDATE**

The Board received a report of the Commissioner on the City of London Police Risk Register Update.

It was noted that the change to the City of London Corporation risk scoring matrix to 4 x 4 only, may draw criticism by HMICFRS as other Police Forces use the 4x4x4 scoring system.

Officers informed the Board that the Fraud & Cyber Crime Reporting & Analysis Service Programme was expected to be delivered within the projected timeframe and within budget at present.

RESOLVED- That the report be noted.

11. **UPDATE ON VIOLENCE AGAINST WOMEN AND GIRLS (VAWG) ACTIVITY**

The Board received a report of the Commissioner which provided an Update on Violence against Women and Girls (VAWG) activity.

The Chair commented that the Professional Standards and Integrity Committee discussed the importance of the newly established Listening Circles for women in the City of London Police and suggested that these be established for other protected characteristics and that the concept be shared with the City of London Corporation.

Following a query from a Board member Officers provided an overview of the misconduct claims adding that additional to the formal claims it was vital to develop a positive and sensitive culture to encourage reporting.

RESOLVED- That the report be noted.

12. **QUARTERLY EQUALITY AND INCLUSION UPDATE**

The Board received a report of the Commissioner which provided Quarterly Equality and Inclusion Update.

Officers highlighted that the City of London Police had been chosen as an icebreaker organisation for the Race Action Plan.

The Board expressed concern regarding the diversity of the individuals hired in the first cohort of the Police Uplift plan. Responding to these concerns Officers explained the factors impacting this, including the competition for hires and the need to fill specific skill sets.

RESOLVED- That the report be noted.

13. **QUARTERLY COMMUNITY ENGAGEMENT UPDATE**

The Board received a report of the Commissioner Quarterly Community Engagement Update.

In response to a query raised by the Chair Officers confirmed that a greater granularity of data on anti-social behaviour will be developed to assess the underlying causes for reporting at SPPC.

It was confirmed, in response to the Chair's query, that the City of London Corporation Academies would be included in the youth community engagement.

Replying to a Member's comment it was confirmed that continuity in ward policing would be maintained as far as is possible noting that the uplift programme was expecting that the Uplift would improve corporate memory and consistency in the Ward Team Officer representation.

It was confirmed that the Ask for Angela safety initiative communication was displayed in the appropriate venues.

RESOLVED- That the report be noted.

14. COMMUNITY/ YOUTH ENGAGEMENT PROGRAMME

The Board received a joint report of the Commissioner and Director of Community and Children's Services on the Community and Youth Engagement Programme.

RESOLVED- That the report be noted.

15. PROTECT DUTY UPDATE

The Board received a report of the Commissioner on the Protect Duty Update.

The Chair requested a further joint report on the Protect Duty consultation be prepared for the Board's consideration, once there had been meaningful development on which to report.

RESOLVED- That the report be noted.

16. HAJJ FRAUD UPDATE

The Board received a report of the Commissioner which provided a Hajj Fraud Update.

It was observed that this report had been produced to provide a public summary of the work completed to combat Hajj related fraud by the City of London Police following a request from the Board to make publicly available a report on the work being completed.

RESOLVED- That the report be noted.

17. NATIONAL BUSINESS CRIME PORTFOLIO- NATIONAL BUSINESS CRIME CENTRE

The Board received a report of the Commissioner on the National Business Crime Portfolio National Business Crime Centre.

RESOLVED- That the report be noted.

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

There were no questions.

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

The Chair requested that the Board considered the allocation of further positions for Board Members on the Board's committees to allow the newly appointed external members to join these committees.

20. **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.

Item No.	Paragraph(s) in Schedule 12A
21-32, excluding 27-39	3
27-30	7

21. **NON-PUBLIC MINUTES**

The Board considered the draft non-public minutes of the Police Authority Board meeting held on the 20th of July 2022.

RESOLVED – That the non-public minutes of the Police Authority Board meeting held on 20th of July be approved as an accurate record.

22. **NON-PUBLIC OUTSTANDING REFERENCES**

The Board received a joint report of the Town Clerk and City of London Police Commissioner on the non-public outstanding references from the last meeting of the Board.

RESOLVED- That the report be noted.

23. **DRAFT NON-PUBLIC MINUTES OF THE RESOURCE, RISK & ESTATES COMMITTEE**

The Board received the draft non-public minutes of the Resource, Risk & Estates Committee meeting held on the 5th of September.

RESOLVED- That the draft minutes be noted.

24. **CHAIR'S NON-PUBLIC UPDATE**

The Board received the Chair's non-public update.

RESOLVED- that the update be noted.

25. **COMMISSIONER'S UPDATES**

The Board received the Commissioner's non-public update.

RESOLVED- That the report be noted.

26. **CITY OF LONDON POLICE RETENTION MEASURES**

The Board received a report of the Commissioner on the City of London Police Retention Measures.

RESOLVED- That the report be approved.

27. **BRIDGE HOUSE ESTATES AND CITY OF LONDON POLICE SERVICE LEVEL AGREEMENT**

The Board considered a joint report of the Commission and Town Clerk on the Bridge House Estates and City of London Police Service Level Agreement.

RESOLVED- That the report be agreed.

28. **PARTNERSHIP APPROACH TO DELIVER A SAFE NIGHT-TIME ECONOMY-OPERATION REFRAME**

The Board received a joint report of the Commissioner and Town Clerk on the Partnership approach to deliver a safe Night-Time Economy-Operation Reframe.

RESOLVED- That the report be noted.

29. **REVIEW OF CITY OF LONDON POLICE JUVENILE STRIP SEARCHES JANUARY 2019- APRIL 2022**

The Board received a report of the Commissioner on the Review of the City of London Police juvenile strip searches January 2019- April 2022.

RESOLVED- That the report be noted.

30. **NON-PUBLIC APPENDIX FOR ITEM 10**

The Board received the non-public appendix for Item 10.

Resolved- That the report be noted.

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

There were no questions.

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

There were no items of urgent business.

The meeting ended at 12.05 pm

Chair

Contact Officer: Richard Holt
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City of London Police Authority Board – Public Outstanding References

11/2022/P	27 September Item 6- Chair's update	Chair to write to the newly appointed Government Ministers as appropriate.	Chair/ Police Authority	
12/2022/P	27 September Item 9- Q1 Revenue and Capital Budget Monitoring 22-23	Update on the progression of the City of London Police's Corporate Services review to be provided within 6 months	Commissioner of Police	In Progress- update due within 6 months

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PROFESSIONAL STANDARDS & INTEGRITY (POLICE) COMMITTEE **Monday, 26 September 2022**

Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Monday, 26 September 2022 at 2.00 pm

Present

Members:

Caroline Addy (Chair)
Deborah Oliver (Deputy Chairman)
Alderman Professor Emma Edhem
Deputy James Thomson
Jason Groves
Michael Mitchell (External Member)

Officers:

Paul Betts	- City of London Police
Sanjay Andersen	- City of London Police
Carly Humphreys	- City of London Police
Richard Holt	- Governance Officer, Town Clerk's Department
Hayley Williams	- City of London Police
Dermont Robinson	- City of London Police
Ian Younger	- City of London Police
Claire Cresswell	- City of London Police
Alix Newbold	- Interim Director, Police Authority Team, Town Clerk's Department
Rachael Waldron	- Police Authority Team, Town Clerk's Department

1. APOLOGIES

Apologies were received from Tijs Broeke, Florence Keelson-Anfu and Nicholas Bensted-Smith.

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

There were no declarations of interest.

3. MINUTES

The Committee considered the public minutes and non-public summary of the Professional Standards and Integrity Committee meeting held on the 25th of May 2022.

RESOLVED- That the public minutes and non-public summary of the Professional Standards and Integrity Committee meeting held on the 25th of May 2022 be approved as an accurate record.

4. **REFERENCES**

Members received a report of the Town Clerk and Commissioner regarding the Committee's outstanding references.

RESOLVED - That the Report be noted.

5. **INTEGRITY AND CODE OF ETHICS UPDATE**

The Committee received an oral update from the Assistant Commissioner on the Integrity and Code of Ethics.

The Committee discussed the importance of the newly established Listening Circles for women in the City of London Police and suggested that these be established for other protected characteristics and the concept be extended to the City of London Corporation.

Replying to a query from a Member Officers confirmed that the Force was keen to work with the City of London Corporation to reach as wider audience as possible with regard this outreach.

The Police Authority Board Chair asked for an update on proportional allocation of staff resource and the role of the Safer City Partnership. It was confirmed that qualitative and quantitative data was analysed to assess the success of the allocation of resources and that the Safer City Partnership was engaged appropriately.

REVOLVED- That the update be noted.

6. **UPDATE ON VIOLENCE AGAINST WOMEN AND GIRLS (VAWG) ACTIVITY**

The Committee received a report of the Commissioner which provided an update on the Violence against Women and Girls activity (VAWG). The Chair welcomed the Temporary Chief Superintendent to their first meeting of the Committee and noted the positive steps taken on the introduction of the listening circles for women in policing.

The Committee discussed the Force's engagement with the local VAWG sector representatives and how the National Police Chiefs' Council analysis of safe spaces being incorporated into the City of London Corporation's polices.

The Committee requested further information on the implementation of internal inclusion policies. It was confirmed that Officers were comfortable with the formal disciplinary procedures but noted that issues could be caused at a lower-level by inappropriate behaviour and culture which needed to be continually challenged. Additionally, it was noted that the Force had been chosen as an ice breaker organisation for key actions from the National Race Action Plan

Following a request from the Chair of Police Authority Board Officers undertook to review whether the establishment of a Banter Policy for the Force would be appropriate for the City of London Police.

In response to a Member's query it was confirmed that that an anonymised Staff survey for staff was completed annually and this included a reporting system for staff concerns regarding equality and inclusion. The Chair noted that staff perception of issues, even if not correct, were important to note. It was confirmed that the results of the survey would be presented to Members in due course once the Force had run the survey.

The Chair noted the risk for the Force when dealing with legal but harmful online content, with regard to the Online Harm Bill.

Following a question from the Chair Officers provided an update on the Police-Perpetrator Super Complaint.

RESOLVED- That the report be noted.

7. QUARTERLY EQUALITY AND INCLUSION UPDATE

The Committee received a report of the Commissioner on the Quarterly Equality and Inclusion Update.

The Committee discussed the City of London Police Public Sector Equality Duty report 2021, the Force's current staff exit process and the Hate Crime Awareness Week.

The Committee noted concerns regarding the diversity of those joining the Force as part of the uplift programme. In response Officers explained the factors affecting the diversity of those hired including the need to hire those with specific skill sets and the impact of the Metropolitan Police's uplift programme on the demand for qualified candidates.

The Committee noted that the appropriate communication of why the staff diversity statistics were requested was key for successful engagement.

A Member requested that future report include numbers as well as percentages, especially for some of the protected characteristics such as religion and belief where possible. and for the statistics to be uniform in their presentation.

RESOLVED- That the report be noted.

8. ACTION FRAUD STATISTICS – QUARTER 1 –1ST APRIL 2022 – 30TH JUNE 2022

The Committee received a report of the Commissioner on the Action Fraud Statistics Quarter 1, 1st April 2022 – 30th June 2022.

The Chair noted the different impact to victims of online crime in comparison to physical crime and noted that there was a question on how many users of the Action Fraud system who experienced issues, did not make formal complaints.

The Committee noted that education and prevention was key to successfully combating fraud. It was confirmed that learnings from complaints received had been incorporated into the requirements for the procurement of the future Action Fraud

services. A Member noted that appropriately sensitive communication was key when dealing with victims of fraud.

RESOLVED- That the report be noted.

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

There were no questions received in the public session.

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

There was no urgent business considered in the public session.

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 Local Government Act.

12. **NON-PUBLIC MINUTES**

The Committee considered the public minutes and non-public summary of the Professional Standards and Integrity Committee meeting held on the 25th of May 2022.

RESOLVED- That the non-public minutes of the Professional Standards and Integrity Committee meeting held on the 25th of May 2022 be approved as an accurate record.

13. **NON-PUBLIC REFERENCES**

Members received a report of the Town Clerk and Commissioner regarding the Committee's outstanding references.

RESOLVED - That the Report be noted.

14. **REVIEW OF CITY OF LONDON POLICE JUVENILE STRIP SEARCHES JANUARY 2019- APRIL 2022**

The Committee received a report of the Commissioner regarding the on the Review of City of London Police juvenile Strip searches January 2019-2022.

RESOLVED- That the report be noted.

15. **PROFESSIONAL STANDARDS STATISTICS – QUARTER 1 –1ST APRIL 2022 – 30TH JUNE 2022**

The Committee received a report of the Commissioner on the Professional Standards Statistics Quarter 1 1st April 2022 30th June 2022.

RESOLVED- That the report be noted.

16. **PCR CASE SUMMARY AND PCR REPORTS**

Members received a report of the Commissioner regarding a series of PCR Case Summaries.

RESOLVED- That the report be noted.

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

There were no questions considered in the non-public session.

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

There was one items of urgent business considered in the non-public session.

The meeting ended at 3:45pm

Chair

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**ECONOMIC AND CYBER CRIME COMMITTEE OF THE CITY OF LONDON POLICE
AUTHORITY BOARD
Monday, 3 October 2022**

Minutes of the meeting of the Economic and Cyber Crime Committee of the City of London Police Authority Board held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Monday, 3 October 2022 at 3.00 pm

Present

Members:

Deputy James Thomson (Chair)
Alderman Professor Emma Edhem
Dawn Wright
Andrew Lentin (External Member)
Jason Groves
Alderman Bronek Masojada

Officers:

Richard Holt	- Town Clerk's Department
Alix Newbold	- Director, Police Authority
Oliver Bolton	- Police Authority
Peter O'Doherty	- Assistant Commissioner, City of London Police
Charlie Morrison	- City of London Police
Hayley Williams	- City of London Police
Andrew Gould	- City of London Police
Melissa Panzi	- Innovation and Growth Department
Lucy Cumming	- City of London Police

1. APOLOGIES

Apologies were received from the Deputy Chair Tijs Broeke, James Tumbridge, Deputy Graham Packham, Deputy Graeme Doshi-Smith and the Chair of the Policy and Resources Committee Deputy Christopher Hayward.

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

The Chair Deputy James Thomson made a declaration as non-executive board member of Economic and Cyber Crime Academy and as a member of the Serious Fraud Office board.

3. MINUTES

The Committee considered the draft public minutes and non-public summary of the previous meeting of the Economic and Cyber Crime Committee held on the 13th of May.

RESOLVED- That the public minutes of the previous meeting of the Economic and Cyber Crime Committee held on the 13th of May be approved as an accurate record.

4. **PUBLIC OUTSTANDING REFERENCES**

The Committee received a joint report of the Town Clerk and Commissioner on the public outstanding references from the last meeting of the Committee.

Further to action 12/2021/P Officers provided an update on the engagement with FinTech firms, including the scheduled events over the next quarter. The Chair added that lots of good work in this area was being completed which was not all captured in the note provided to the Committee. It was noted that there was an event being planned to take place in January 2023.

Updating on the action 6/2022/P regarding the number of Action Fraud Call Handlers Officers confirmed that this number was now at its highest level and there was an expectation of an improvement in the service as a result.

Following an update on action 1/2022/P regarding the City of London Police involvement with insurance companies it was noted that a discussion with the new head of the Association of British Insurance would be undertaken with an update to the next meeting of the Committee.

RESOLVED- That the report be noted.

5. **INNOVATION & GROWTH UPDATE OF CYBER & ECONOMIC CRIME RELATED ACTIVITIES**

The Committee received a report of the Executive Director Innovation and Growth on the Innovation and Growth Update of Cyber & Economic Crime related activities.

The Chair commented that further progress on this project should not be delayed in order to fit in with the City of London Corporation's governance processes and instructed Officers to take this forward as promptly as possible.

Replying to a Member's query the process for the development of technology adoption from the Cyber Innovation Challenge was outlined to the Committee.

RESOLVED- That the report be noted.

6. **NATIONAL LEAD FORCE PERFORMANCE REPORT Q1: APRIL – JUNE 2022**

The Committee received a report of the Commissioner on the National Lead Force Performance Report Q1 April- June 2022. The Committee received an accompanying presentation from Officers on the City of London Police's role as National Lead Force for fraud.

In response to a Member's query Officers confirmed that there was a dedicated team in place with responsibility for the recovery of assets.

Following a request from the Committee, Officers undertook to include a metric on the number of call handlers and response times to the Service's success measures.

A Member requested further information on the process for establishing future trends in fraud. Officers confirmed the extensive process for establishing these trends

including engagement with effected business and national bodies to develop a cross sector perspective.

Officers confirmed, in response to concerns expressed by the Committee, that a fully funded City of London Police communication team with responsibility for effective communication of matters relating to the fraud and cyber crime. In addition, the specific methodology for engagement with small and medium size businesses was explained.

RESOLVED- That the report be noted.

7. NATIONAL LEAD FORCE UPDATE

The Committee received a report of the Commissioner which provided the National Lead Force update.

Responding to a Member's query it was confirmed that an update on the work for cyber crimes which are not financial in nature would be provided in future reports.

Following discussion by the Committee Officers outlined the proactive and reactive policies for removing websites involved in the criminal activity including the use of artificial intelligence. The Chair noted that, in the long term, this action would likely be led by artificial intelligence systems.

The Committee discussed the possibility for tougher sentences for fraud related offences and requested that Officers explore opportunities for providing this feedback to the Government.

Replying to the Chair's comment the national work of the Economic and Cyber Crime Academy was explained to the Committee. In addition, it was confirmed that the Academy was in part, funded by POCA funds.

RESOLVED- That the report be noted.

8. CYBER GRIFFIN UPDATE

The Committee received a report of the Commissioner which provided an update on Cyber Griffin.

The Committee discussed how best to make the Cyber Griffin initiative nationally integrated and requested that Officers develop a strategic option on this for the Committee's consideration.

Responding to a Member's query the sector-by-sector engagement strategy was explained noting that continuous work was being undertaken to make this engagement more impactful and valuable.

RESOLVED- That the report be noted.

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

Following the Chair's question an update on Economic and Cyber Crime Member reference group was provided to the Committee. It was noted that, whilst the reference group was designed to facilitate wider Member engagement beyond the Committee, Committee Members should also be invited to the reference groups meeting.

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

There was no urgent business considered in the public session.

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 item(s) on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

12. **NON-PUBLIC MINUTES**

The Committee considered the draft non-public minutes of the previous meeting of the Economic and Cyber Crime Committee held on the 13th of May.

RESOLVED- That the non-public minutes of the previous meeting of the Economic and Cyber Crime Committee held on the 13th of May be approved as an accurate record.

13. **NON-PUBLIC OUTSTANDING REFERENCES**

The Committee received a joint report of the Town Clerk and Commissioner on the non-public outstanding references from the previous meeting.

RESOLVED- That the report be noted.

14. **STRATEGIC COMMUNICATIONS & ENGAGEMENT: QUARTERLY UPDATE- ECONOMIC AND CYBER CRIME**

The Committee received a report of the Commissioner on the Strategic Communications and Engagement Quarterly Update Economic and Cyber Crime.

RESOLVED- That the report be noted.

15. **NPCC CYBER CRIME PORTFOLIO- CYBER CRIME PLAN 2022-23**

The Committee received a report of the Commissioner on the NPCC Cyber Crime Portfolio Cyber Crime Plan 2022-23.

RESOLVED- That the report be noted.

16. **NPCC CYBER CRIME PORTFOLIO- CRYPTOCURRENCIES AND VIRTUAL ASSETS**

The Committee received a report of the Commissioner on the NPCC Cyber Crime Portfolio cryptocurrencies and virtual assets.

RESOLVED- That the report be noted.

17. **NPCC CYBER CRIME PROGRAMME - BENEFITS EVALUATION 2021-22**

The Committee received a report of the NPCC Cyber Crime Programme Benefits Evaluation 2021-22.

RESOLVED- That the report be noted.

18. **FRAUD AND CYBER CRIME REPORTING AND ANALYSIS SERVICE - NEXT GENERATION AND CURRENT SERVICE UPDATE REPORT**

The Committee received a report of the Commissioner on the Fraud and Cyber Crime Reporting and Analysis Service Next Generation and Current Service update.

The Committee agreed to suspend Standing Order 40 and extend the meeting beyond two hours.

RESOLVED- That the report be noted.

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

There was one question received in the non-public session.

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

There was no urgent business considered in the non-public session.

The meeting ended at 5:03pm

Chair

Contact Officer: Richard Holt
Richard.Holt@cityoflondon.gov.uk

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Committee(s): Police Authority Board	Dated: October 2022
Subject: Chair's Update	Public
Report of: James Thomson	For Information

National Cyber Awards

The Chair and the Commissioner attended the National Cyber Awards which recognise achievement in tackling cybercrime across policing and the private sector. We are evaluating the format of this and whether the City of London can play a more pivotal role in this important national event.

Cyber Resilience Centre Network Summit

The Police Authority was represented at the Cyber Resilience Centre Network Summit on 10 October, hosted by City of London Police and held in the offices of Microsoft. The summit enabled key contributors across the network and country to understand how each contributes to the national aims of the programme and how the network can work more closely together in the future.

It is clear that the NCRCG is having significant success engaging with major companies and also in supporting the roll out of student services under Cyber Path.

City of London Police Economic Crime Briefing

The Chair of the Police Authority Board spoke at the Economic Crime Briefing on 11 October, hosted by City of London Police and held in the offices of Aviva. Other speakers included the Security Minister, who reinforced the government's commitment to tackling economic crime. Attendees included chief officers and economic crime strategic leads from across policing and the wider counter fraud community.

Cyber Griffin – Member Session

A session for Members on Cyber Griffin was attended by 25 people was run on 18 October. The training was well received and the Police Authority will look at ways to promote the training.

Launch of the London Cyber Resilience Centre

The Chair of the Police Authority spoke at the launch of the London Cyber Resilience Centre on 25 October alongside the Deputy Mayor of Policing and Crime and the Commissioner of City of London Police. The launch of the centre will provide vital support for London's small and medium size enterprises and improve cyber resilience across the supply chain ensuring London is a safe place to do business. The launch also provided an opportunity to highlight the work the National Cyber Resilience Centre Group, led by the City, is doing to support the regional network.

Cyber Duty to Protect

The Home Office has launched a consultation on a duty to protect against cyber crime. City of London Police has been heavily involved in shaping this at a working level with government, providing invaluable operational and intelligence expertise. The Police Authority has submitted a response, outlining its support for a duty and the need for collective responsibility to prevent cyber crime. The response also highlights key work by City of London Police in support of the wider cyber agenda.

Homeland Security Investigations

The Police Authority hosted a lunch at Grocer's Hall for the Executive Director, Chief of Staff and Attache of Homeland Security Investigations (HSI). The City of London and HSI are collaborating on a range of public safety and national security threats including economic and cybercrime and intellectual property enforcement.

Hate Crime Awareness Week

Chairs of Police Authority Board and Policy & Resources provided statements of support for the anti-hate crime charity 17-24-30, and promoted social media activity to encourage reporting and signpost support services for victims. Hate crime has no place in London or the Square Mile and all reports will be taken seriously.

On Your Side (www.onyourside.org.uk) is a newly launched nationwide service, offering dedicated support for East and Southeast Asian victims of racism and/or other forms of hate available to residents in the City. The service includes a 24/7 freephone helpline available in East and Southeast Asian languages, a website with reporting forms and resources, and ongoing community-based support delivered by trained casework advocates.

Operation Reframe

The Chair of Police Authority Board joined an Operation Reframe deployment on a Friday night in early October and was truly impressed with the ambition of the operation and the scale of collaborative working.

Operation Reframe is a multi-agency initiative to ensure people enjoying the night time economy in the City are able to do so safely and with confidence. It is an excellent example of cross-departmental working involving the police, licensing, environmental health and communities departments of the Corporation, as well as external partners including Parkguard, the Security Industry Association, St John's Ambulance Service, London Fire Brigade, Network Rail, British Transport Police, Street Pastors and the Samaritans.

This visible partnership approach supports ambitions to create a safe and attractive destination for people who live and visit the City. Opportunities are available for Members to join these deployments in the run up to Christmas.

Salisbury Square

On 18 October, the Chair attended the unveiling of the first stone for the new City of London Police HQ and new Courts Building along with the Commissioner and Chair of Risk Resources and Estates. The new HQ is due for completion in 2026. The unveiling was attended and undertaken by the Lord Chancellor, Brandon Lewis.

APCC General Meeting

The Chair attended the quarterly APCC General Meeting. It included some positive messaging from the new Home Secretary and there was an opportunity for PCCs to meet the new Chief Executive of APCC who joins shortly. The Chair ran the recruitment panel for his selection. It is expected that January meeting of APCC will be held at Guildhall and for it to have a strong focus around fraud and cyber.

999 Day

999 Day, which was due to take place the day after Her Late Majesty the Queen passed away, was held on 19 October. A flag was raised at Guildhall to recognise the 2 million people who work and volunteer in the emergency services and a two minute's silence observed to remember the 7,500 people who have lost their lives as a result of their duties.

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Committee(s): Police Authority Board	Dated: 27 October 2022
Subject: Commissioner's Update	Public
Which outcomes in the <i>City Corporation's Corporate Plan</i> does this proposal aim to impact directly?	1- People are safe and feel safe
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Commissioner of Police Pol 90-22	For Information
Report author: Angela McLaren, Commissioner	

Summary

At the April 2022 Police Authority Board, it was agreed that the Commissioner's verbal updates would now be presented to the Board as formal written updates.

The *public* updates for Operations and Security and Economic and Cyber Crime are attached.

Recommendation(s)

Members are asked to note the report.

Acquisitive & Violent crime

Operation Mantis commenced following the attempted robbery and knife attack at Bishopsgate on Thursday 6th October. Investigators from our Major Investigations Team worked tirelessly utilising every tactic and resource available. The Senior Investigating Officer was able to build evidence to support the arrest of two suspects and a connected individual with the first arrest being made within four days of the incident the second and third arrests made three days later. The first suspect Louis Parkinson has been charged with four offences including wounding with intent and possession of a bladed article. The second suspect Tyrone Dean was charged with a total of eight offences including robbery, actual bodily harm and three counts of wounding with intent. Both men have been remanded in custody and will be appearing on the 8th November (PARKINSON) and 11th November (DEAN) at Inner London Crown Court. The third suspect has been released under police bail to return on Friday 11th November 2022. Our Communications and Sector Policing teams are releasing regular information to the public and our community to provide reassurance and updates.

Operation Niven has been live since June following monitoring of crime trends. In September there were 52 theft snatch incidents, 3 of the snatch incidents were attempts. Compared to the previous month we have seen a 41% decrease in this crime type. The top locations for snatch incidents are Fleet Street and Eldon street, we are deploying officers to these and other locations in the City daily. We have made seven arrests since the last reporting period and continue to work with our Metropolitan Police colleagues to disrupt and detect this crime type by building intelligence on known offenders.

Night Time Economy

Op Reframe, was held on 30th September 2022, 39 licensed premises were checked resulting in two un-licensed members of door security being arrested on suspicion of fraud, 25 drinks were tested for ‘spiking’ substances and 10 visitors were supported by our welfare tent. The operation was well received and attended by our partners who continue to see the value of the operation

Anti-Social Behaviour (ASB)

On 27th September officers and support agencies deployed as part of Op Luscombe to tackle homelessness, begging an anti-social behavior associated with the homeless community

Op Romsey continues to deploy officers to Bank Junction to detect / deter inconsiderate cycling and mopeds.

Professionalism & Trust

A final draft of our local Race Action Plan is soon to be finalised, we will hold a consolidation meeting with the Black Police Association and other partners, to streamline actions from the National Race Action Plan, and the BRAP Survey, into one action tracker

The Violence Against Women & Girls ‘Plan on a Page’ will be released this week to help our workforce to understand our key aims and objectives. This will enable us to embed its associated values throughout our organisation.

As part of our Inclusivity Programme launching in November, we will be presenting all officers and staff with a menu of options from which to choose their inclusivity sessions depending on their learning style and access requirements.

We are hosting a series of sessions at the Aviva HQ in the City across November and December to support development of our workforce.

Economic Crime Briefing

The Economic crime briefing for the UK’s Economic Crime and ROCU leads around the country was held on the 11th October. It was very well attended with 39 forces committed delegates with a total of 12 Chief Officers in attendance. 162 attendees heard National Economic Crime updates from speakers including the Security Minister Rt. Hon. Tom Tugendhat MP MBE, Chief Crown Prosecutor Andrew Penhale, APCC Economic and Cybercrime Lead and the Chair of the City of London Police Authority Board James Thompson along with Assistant Commissioner Peter O’Doherty and Commander Nikolas Adams.

CRC Summit

The inaugural Cyber Resilience Centre Network Summit was held on 10th hosted by Microsoft. It brought together the regional and national CRCs, National Ambassadors (Microsoft, KPMG, The Very Group, Lockheed Martin, Chainalysis, CGI, Accenture, Mastercard) for the first time to meet and discuss the development of the Network. It was a really well attended and successful event which we will repeat in 6 months’ time.

Notable Operations

- Operation Corona – Investment fraud – 343 victims 5.4 million losses. Claimed to be selling Ecuadorian Gold mine rights. 4 defendants made guilty pleas during first week of trial. Sentencing will follow in November.
- Op Freyr, individual arrested for running a ‘Telegram’ group sharing data for large scale smishing and phishing scams.
- Operation Bloxswitch – Intensification period targeting sale of counterfeit football shirts in the build up to the World Cup in Qatar. Results from the first period are; £250k of goods detained, 3 arrests and £12k in cash seized.
- Operation Broadway intensification week is now underway. This is an investment fraud/boiler room disruption campaign. A national media campaign alongside the NCA, and Trading Standards will run alongside some targeted visits to serviced offices in the London area that potentially house suspicious companies. Serviced office staff will be given widescale advice on ceasing relations with suspect companies.

Action Fraud and FCCRAS

An in-depth meeting with committee members is now planned to give a ‘deep dive’ for the on-going Action Fraud update work. This will include finance, capability, and technological aspects.

A demonstration was delivered to the Home office off, showing all the features expected in the 2024 upgrade to Action Fraud. This resulted in a positive session. It has been agreed that the Home Office team will have access to a test version of the new website when it is ready.

Funding secured under project Agade (funding offered through NCA for projects) which will support extra staff.

Cyber

National cybercrime plan for policing has been agreed and signed off by the Economic and Cyber Crime Committee. This will improve the operational response, deliver the single HMICFRS inspection recommendation, develop policing cybercrime capability and capacity, extend strategic influence and communications, develop people strategy and delivering greater alignment and collaboration with economic crime.

Campaigns & Media

Action fraud - October is Cyber Security Awareness month. Action Fraud and partner agencies produced public facing output.

IFED - Ghost broker Awareness week working with partners and stakeholders.

PIPCU - High engagement with social media, operational press releases, visits to Interpol and a notable hacking case.

Chief Officer Team engagement - AC O'Doherty, James Thomson and Commissioner McLaren met with US Homeland Security Director to discuss on-going partnership and good works.

Angela McLaren
Commissioner
City of London Police

Committee(s)	Date:
Police Authority Board – for information Independent Custody Visitor Panel – for information	27 October 2022 18 January 2023
Subject: Independent Custody Visiting Scheme Annual Report 2022/23	Public
Report of: Town Clerk	For Information
Report author: Rachael Waldron, ICV Scheme Manager, Town Clerk's Department	

Summary

This report completes the requirement to update Members on the progress of the City of London's Independent Custody Visiting Scheme, presenting the Panel's Annual Report and informing Members of some of the recent issues raised by the ICV Panel in relation to custody provision in the City. Issues raised at the Panel meetings over the past year include reference to challenges presented to the custody environment post-pandemic; and following the implementation of the exercise yard facility.

Recommendation(s)

Members are asked to note the contents of this report.

Main Report

Background

1. The Independent Custody Visiting scheme is well established and has been functioning in its current capacity since November 2007. Members of the Police Committee agreed in May 2009, that a regular report would be presented to the Committee on an annual basis.
2. Independent Custody Visitors (ICVs) conduct unannounced visits in pairs to custody suites to monitor and report upon the treatment and conditions of persons held in custody. They check that the rights and entitlements, wellbeing and dignity of detained persons are being observed; and monitor this on an entirely independent and confidential basis. ICVs undertake visits to custody in a voluntary capacity; and are there to look, listen and report on the conditions in custody at the time of their visit. They report their observations to City of London Police (COLP) and to the ICV Panel, which is made up of all the visitors. Meetings of the ICV Panel take place on a quarterly basis and are attended by all Custody Visitors, alongside the City of London Police (usually the custody manager). Issues of serious concern raised by visitors during visits were escalated to the Lead Member for Safeguarding and Public Protection via the ICV Scheme Manager.

3. The visits take place on a three in two weeks basis. The Covid-19 outbreak resulted in a reduction across the frequency of visits, with visits occurring once a week (from April 2021 to March 2022). The visitors will also visit Brewery Road Custody (as part of the collaboration with the British Transport Police).

Current position

4. The ICV Annual report provides a summary of key issues identified and any remedial action undertaken, along with examples of good work within custody. It also sets out the ICV Scheme objectives for the current financial year.

Legal Implications

5. In accordance with Section 51 of the Police Reform Act (2002), the City Corporation is required to have in place an Independent Visitors Scheme.

Conclusion

6. The City of London ICV Scheme provides an independent assessment across the treatment of detained persons. The commitment and dedication of volunteer visitors ensures a continued and appropriate level of scrutiny of the Force is maintained.
7. The Panel records their thanks to all ICVs. All should be commended for their steadfast commitment to independent custody visiting during the post pandemic period.
8. Further updates on this Scheme will continue to be provided to Members on an annual basis.

Appendices

- Appendix 1 – ICV Annual Report 2022/23

Background Papers

Annual Custody Report – November 2019 Police Committee
ICV Guidelines – January 2017 Police Committee

Rachael Waldron

ICV Scheme Manager – Town Clerk's Department
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Annual Report

October 2022

City of London

Independent Custody Visiting Scheme

Foreword, by the Chairman of the ICV Panel, Godfrey Baillon-Bending

In the fourth year of my tenure as Chair of the independent Custody Visiting Panel (ICV), we encountered another challenging year due to Coronavirus. However, the situation has continued to improve with risk assessments continuing to be carried out by the newly appointed Custody Manager and Custody Staff to minimise risks. Activity undertaken by the force has focused on adhering to statutory responsibilities and recovery post-pandemic and I look forward to an easier reporting period next year.

I am very pleased to report that all independent custody visits in the last year were carried out in person, due to the dedication of our small but committed number of volunteers. This is a significant achievement, in light of the varied picture which exists nationally. Many schemes have only recently resumed physical visits to custody and continue to experience high attrition rates across volunteers.

As expected, custody detention numbers have continued to increase although they have not consistently reached pre-pandemic levels.

Extinction Rebellion remained active across London, along with other protest groups. On the occasions where protest activity was experienced within the City and detention observed by ICVs, I am pleased to report that City of London Police officers handled themselves professionally, appropriately risk managed situations and worked hard to ensure the dignity, and well-being of detainees throughout visits.

In the same context, the Samaritans service has become well embedded within custody and has continued to make a real and tangible difference to detainees experiencing mental health crises. Detainees have been able to access the listening service provided by volunteers on a confidential basis. This has afforded detainees with opportunities to receive mental health support independent of the City of London Police.

Despite some delays, improvements have continued to be made across Appropriate Adult attendance times. On occasions where attendance times have fallen below the required key performance indicators, follow up action must continue to be undertaken by the Panel to ensure timely support continues for all juveniles and vulnerable individuals entering detention. This will continue to be monitored.

Further to the recommendations outlined by HMICFRS in 2018, regarding the lack of an exercise provision, some improvements have been implemented. Nonetheless, the Panel will carry on working jointly with the City of London Police to find a permanent solution to flooding difficulties experienced.

I would like to thank all the ICVs together with the support of the Vice Chair for their dedicated and continued support and undertaking visits in another challenging year. I also extend my thanks for the City of London Police, the new Custody Manager, wider support staff, the City of London Scheme Manager and the Safeguarding representative from the Police Authority Board for their continued cooperation and support across the smooth running of visits. Additionally, I wish the new Commissioner every success in maintaining the high standards of the City of London Police.

James Thomson, Chairman Police Authority Board

Deputy Bottomley, ICV Panel Member (Lead for Public Protection and Safeguarding), Police Authority Board

Foreword, by the Lead Member for Public Protection and Safeguarding, Police Authority Board, Deputy Keith Bottomley

Despite the obvious challenges that have been present in the last year during the recovery from the COVID-19 Pandemic, I am pleased to see that ICVs have continued to focus on ensuring the parity of care for all detainees in police custody.

Detainees come from all areas of the community and each have their own particularly needs and vulnerabilities.

Whilst it is clear that some of these needs are more obvious than others, it is fair and right that the City of London Police and our Independent Custody Visitors take all reasonable steps to ensure that these needs and vulnerabilities are identified to help mitigate any risks promptly and as soon as practicable.

Independent custody visiting is a key element of community scrutiny of policing and so our ICVs play an increasingly important role in ensuring that the needs of detainees are met throughout their detention process.

I am also glad to see that Independent Custody Visitors have felt empowered to bring attention to any feelings of discomfort; and highlight any practice that stands out as positive or poor across custody practice. Custody Visitors should be encouraged to confront areas for improvement as well as celebrating success.

I look forward to seeing the City of London Police building on their collaborative partnerships with mental health and triage services; and the City Scheme expanding on its diversity, equality and inclusivity commitments.

INTRODUCTION

THE CITY OF LONDON INDEPENDENT CUSTODY VISITING SCHEME (ICV SCHEME)

The purpose of this report is to provide an overview of the City of London ICV Scheme in the period of 1 April 2021 to 31 March 2022 including:

- the Panel's performance;
- areas of good practice or issues and concerns the visits have raised; and
- objectives of the ICV Scheme for 2022/23.

The City of London Corporation, as the Police Authority for the City, is a separate body to that of the City of London Police. It has a statutory duty to ensure the delivery of the Independent Custody Visiting Scheme. Oversight of the ICV Scheme is provided by the Police Authority Board.

Independent custody visiting is governed by a range of legislation and guidance including the Police and Criminal Evidence Act (PACE) 1984 and Home Office Codes of Practice and National Standards (2013).

ICVs are members of the local and business community who volunteer to visit police stations on an unannounced basis to check on the treatment of detainees and the conditions in which they are held. To be eligible to become an ICV, individuals must:

- be over 18;
- be independent from the police force and police authority; and
- have no direct involvement in the criminal justice system.

The City of London ICV Panel currently consists of 8 volunteers who visit the custody suite situated at Bishopsgate Police Station on an unannounced basis once a week.

The City of London ICV Panel work in close collaboration with the Mayor's Office for Policing and Crime (MOPAC). Independent custody visitors from the City of London Scheme have undertaken unannounced visits to Brewery Road custody facility.

A member of the Police Authority Board attends the quarterly Panel meetings along with a representative of the City of London Police to ensure that any questions or concerns that have surfaced from visits to custody can be adequately addressed. The quarterly Panel

meetings are supported by the Police Authority ICV Scheme Manager.

THE ROLE OF INDEPENDENT CUSTODY VISITORS

To ensure the safety and wellbeing of volunteers, it is mandatory for visits to custody to be undertaken in pairs. Visits to custody are made on an unannounced basis so ICVs can look, listen and report on conditions in custody at the time of their visit.

The primary objective of all visitors is to observe and report on the treatment and conditions of individual detainees and to check that their rights and entitlements are being observed.

ICVs are accompanied by a custody officer at all times throughout their visit to custody. Each detainee is provided with an opportunity to engage and speak directly to custody visitors. Circumstances may arise where detainees should not be disturbed, particularly when they are asleep during a rest period, or when specific health or safety risks have been identified which prevent an interview from taking place. Detainees may only be interviewed with their consent and may choose not to provide permission.

Visit interviews with detainees are undertaken in clear sight, but out of earshot of the escorting officer so details of what visitors see and hear remain confidential. Strict rules of confidentiality apply so detainees are identified by their custody numbers only. ICVs are independent and impartial. They do not provide advice or involve themselves in the process of investigation. In this respect, they are not concerned with any alleged offence and cannot perform tasks on behalf of the detained person.

ICVs complete a report to record details of the visit. The information included in this report focuses on actions for City of London Police and the ICV Scheme Manager and can include:

- details of any good practice ICVs have observed during their visit

- reference to any immediate problems encountered and resolved at the time of visiting; or
- details of any matters requiring further action.

Copies of the reports are provided to the Superintendent (if appropriate), the Custody Manager and the ICV Scheme Manager. The information provided within each report is discussed by the ICV Panel at the next review meeting. If necessary, more serious issues can be highlighted directly to the Police Authority Board or dealt with outside Panel meetings.

PANEL MEETINGS

Quarterly Panel meetings provide ICVs with an opportunity to discuss each visit and raise any issues that have arisen across the previous quarter.

Short update and information sessions are also incorporated into each agenda to ensure ICVs are kept up to date and well informed of national developments regarding the custody environment.

Topics discussed this year included:

1. Coronavirus

The COVID-19 outbreak continued to present challenges to the custody environment; and drew further attention to the need to ensure greater parity of care and effective oversight in relation to detainee health and welfare.

Despite the barriers presented by the COVID-19 pandemic, the Custody Team and ICV Scheme Manager have continued to work together to ensure the City scheme has continued to deliver its statutory duty.

There were a number of COVID-specific issues highlighted by ICVs, particularly in relation to:

- access to legal advice
- issues of hygiene
- ensuring sufficient facilities and supplies were provided to all who remained in detention during this time

Outcome: The ICV Scheme Manager has continued to work with the City of London Police to ensure access to necessary personal protective equipment, which includes face coverings, handwashing facilities and sanitiser is accessible for detainees throughout their time in detention; and for all visitors to the suite.

While arrangements were made by City of London Police to facilitate legal representation for detainees via telephone calls and virtual arrangements via video enabled justice technology during the height of the pandemic, this has now ceased. Detainees are now consistently able to access legal representation as standard practice.

The ICV Scheme Manager has also worked with the Custody Manager to ensure COVID-19 Standing Operating Procedures have been embedded into practice longer term, which has led to minimal outbreaks of COVID-19 across the period.

2. Exercise Yard

The joint inspection by HMICFRS/HMIP in 2018 outlined the lack of a suitable exercise facility for detainees at Bishopsgate Custody Suite was a cause for concern, as detainees could be held in custody for long periods without having access to time outside or opportunities to exercise.

Outcome: The City of London Police completed the implementation of this custody yard in June 2021, which has enabled detainees to have routine access to fresh air and helped their health and wellbeing while detained.

While this action has been taken by City of London Police there have continued to be a number of challenges encountered post implementation, which have included:

- blockages to the drainage system
- intermittent flooding during periods of inclement weather

City of London Police should consider undertaking a scoping exercise to ascertain the full cost of any remedial works required to the

current drainage system within the exercise yard, ahead of its move to a new custody facility at Fleet Street.

3. Ad-hoc Custody Closures

The City of London Police completed the implementation of Secure City programme, which has allowed for the enhanced monitoring of detainees whilst held in custody. It should be noted that internal IT infrastructure difficulties were experienced as a result of this installation, which led to temporary closures of the custody suite.

Outcome: The Scheme Manager will work closely with CoLP to ensure that suitable detention arrangements are in place with policing counterparts in the event that any unanticipated works are required in future.

Clear processes to identify and track City detainees situated in alternative detention facilities during this time also remains crucial.

4. Final Project Plan for custody at Fleet Street

Work is currently being undertaken to ensure that The Scheme Manager and Chairman of the Independent Custody Visiting Scheme are consulted on design plans for the new custody estate at Fleet Street.

Outcome: The Scheme Manager will continue to work with the City of London Police Custody Management Group to ensure that ICVs are consulted on plans and provided with the opportunity to feed into the design process.

5. Appropriate Adult Attendance

The role of the appropriate adult is to safeguard the interests, rights, entitlements and welfare of children and vulnerable individuals who are suspected of a criminal offence, by ensuring that they are treated in a fair and just manner and are able to participate effectively.

In accordance with national standards for appropriate adult attendance, response times should not exceed 90 minutes.

Outcome: Monitoring data identified that response times for appropriate adults were within 90 minutes, with an average response time of 69 minutes for adults and 76 minutes for juveniles in 2021/22.

While the majority of response times for appropriate adult attendance has occurred within a 90-minute timeframe, there have been occasions where this key performance indicator has not been achieved.

The ICV Scheme Manager will continue to liaise with the Commissioning Management Team at the City of London Corporation, to ensure that each detainee receives the service of support by an appropriate adult. Bi-annual contract monitoring meetings have also been arranged between the Custody Manager, City of London Corporation Commissioning Contract Officer, and Appropriate Adult Service to monitor, review and discuss key concerns. Any further issues arising will be escalated to Police Authority Director for early action.

6. Diversity, Equality, and Inclusion

The ICV Scheme has been involved in a collaborative project with the Independent Custody Visitors Association and Criminal Justice Alliance since October 2020. This project aims to improve the monitoring of equalities by ICVs (with a focus on race and women) and improve the treatment of Black, Asian and Ethnic Minority people in police custody.

Outcome: The Criminal Justice Alliance published their report into the effectiveness of independent custody visitors at monitoring race and gender equality in police custody in December 2021.

The ICV Scheme Manager will continue to implement the following recommendations:

- Routinely collect data on detainees' race and gender on visiting forms
- promote training resources on race and gender equality
- proactively engage with groups disproportionately impacted by police

powers and raise awareness of the custody visitor role

7. Samaritans

In 2015, the HMICFRS published a thematic report on the welfare of vulnerable people in police custody. This inspection placed particular focus on three groups where there is a pronounced concern about the treatment of individuals with mental health conditions, those from Black, Asian and Minority Ethnic backgrounds and children.

The report concluded that the lack of appropriate mental health provision to prevent crises or support those in need of emergency care led to unnecessary and potentially unsafe detention of people with mental health problems.

Outcome: The Samaritans are attending custody three times a week to visit detainees, visitors and staff working within the suite.

The Samaritans service has become well embedded in custody practice, with a total of 23 operational listening volunteers attending custody 3 times a week on Tuesdays, Thursday evenings and Saturday mornings.

Detainees are provided with the opportunity to speak confidentially with volunteers at any point throughout their period of detention.

The City of London Police have also established new partnerships with Turning Point and Narcotics anonymous who provide support to detainees with drug and alcohol dependencies.

2022/23

The ICV Panel has set itself the following priorities for 2022/23:

- To promote and raise awareness of the work of the ICV Panel.
- Increase ethnic diversity and representation across the ICV Panel.
- To work with City of London Police to ensure feedback provided by ICVs

regarding the custody design programme for Fleet Street is reflected in the consultation process.

- To work with the Independent Custody Visiting Association to improve the monitoring of equalities by ICVs and improve the treatment of Black, Asian and Ethnic Minority individuals and women in police custody.
- Deliver a Silver Code Compliant Independent Custody Visiting Scheme, in

accordance with the Independent Custody Visiting Association (ICVA) Quality Assessment Framework.

Conclusion

The ICV Scheme provides an independent assessment of the treatment of detained persons. The commitment and dedication of volunteer visitors ensures a continued and appropriate level of scrutiny.

Visit Statistics

	Total number of detainees in Custody at time of visit	No of detainees offered visit	No. of detainees accepted visit
Bishopsgate Q1	31	17	16
Bishopsgate Q2	35	22	17
Bishopsgate Q3	42	29	21
Bishopsgate Q4	23	15	11
Total	131	83	65

ISSUES AND CONCERNS ARISING FROM VISITS

This list of issues and concerns reflects the range of issues that have been raised by detainees in the last year and other issues which have been reported by ICV Panels elsewhere for which there has been a nil return in the City of London.

	Bishopsgate
No of Total Visits	
Report Form with no matters requiring a police response	1
Infrastructure/furnishings/fittings/out of service	25
Comments individual officers – Positive	19
Comments individual officers – negative	1
Cleaning, tidiness and general hygiene – positive	1
Cleaning, tidiness and general hygiene negative	2
Information Technology	5
Temperature	1
Health related matters	21
Procedures not followed	1
Rights and entitlements seemingly delayed	0
Personal hygiene requests – (showers, washing etc)	1
Requests for phone calls	1
Perceived risk to detainees	0
Periodic checks (15, 30 minutes) not maintained	0
Requests for food and drink	0
Requests for literature/documents	0

Station	Target No of Visits	Achieved	% of Target
Bishopsgate	52	49	94.23

DAYS OF VISITS

	No of Visits	% (figure expressed to two decimal place)
Monday	5	10.20%
Tuesday	10	20.41%
Wednesday	13	26.53%
Thursday	12	24.49%
Friday	4	8.16%
Saturday	4	8.16%
Sunday	1	2.04%
Total	49	

TIME OF VISITS

00.01-06.00	0
06.00-12.00	21
12.01-18.00	14
18.01-00.00	14

DAYS OF VISITS/TIMES – COMBINED

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
00.01-06.00	0	0	0	0	0	0	0
06.00-12.00	3	5	4	3	2	3	1
12.01-18.00	0	3	3	6	1	1	0
18.01-00.00	2	2	6	3	1	0	0

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Committee: Police Authority Board	Dated: 27/10/2022
Subject: Review of the Police Authority	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1,10, 12
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	NA
What is the source of Funding?	NA
Has this Funding Source been agreed with the Chamberlain's Department?	NA
Report of: Interim Director of Police Authority	For information
Report author: Alix Newbold	

SUMMARY

This paper presents the findings of an internal review of the work of the Police Authority against the roles and responsibilities of Police and Crime Commissioners and considers emerging policy and legislative reform in relation to these. It sets out a series of recommendations and areas for development for the Police Authority.

Recommendation(s)

It is recommended that members note the contents of this report.

MAIN REPORT

1. In June 2022, Internal Audit undertook a review of the Police Authority governance against the Policing Protocol 2011 to evaluate the extent to which the Police Authority meets the relevant governance requirements. It recommended the Police Authority should implement a programme of self-assessment exercises to determine the extent to which its governance and oversight arrangements meet the requirements of the Policing Protocol Order 2011. The Police Authority Team decided to extend this recommendation by undertaking a review of its compliance against a wider range of instruments and took the opportunity to consider emerging policy and legislative reform. The findings of the review are attached at Appendix 1.

Appendix 1: Police Authority Review

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POLICE AUTHORITY
REVIEW OF RESPONSIBILITIES

September 2022

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CONTEXT

The City of London Police Act 1839 established the Court of Common Council as the Police Authority for the City of London. The Court delegates this duty (except for the appointment of the Police Commissioner) to the Police Authority Board and its Committees (Strategic Planning and Performance; Resource, Risk and Estates; Professional Standards and Integrity; Economic and Cyber Crime). The function is supported by a team of officers (Police Authority Team).

There is no single statutory instrument that sets out the powers and duties of the Police Authority or Police & Crime Commissioners (PCCs). Police legislation has evolved over many years and local government legislation also plays a part in regulating duties.

The application of legislation and orders relating to PCCs does not always apply to the City of London and is not legally binding. However, the City of London has committed to abiding by the principles of this legislation and for the purposes of this review it is assumed that this should apply across the full range of responsibilities, with the exception of taking responsibility for emergency service collaboration and the Fire & Rescue Service.

In June 2022, Internal Audit undertook a review of the Police Authority governance against the Policing Protocol 2011 to evaluate the extent to which the Police Authority meets the relevant governance requirements. A summary of these recommendations and associated comments are attached at Appendix 1. It recommended the Police Authority should implement a programme of self-assessment exercises to determine the extent to which its governance and oversight arrangements meet the requirements of the Policing Protocol Order 2011. The Police Authority Team decided to extend this recommendation by undertaking a review of its compliance against a wider range of instruments and took the opportunity to consider emerging policy and legislative reform.

When undertaking this review, the following legislation and orders were considered:

Specific legislation:

- City of London Police Act 1839
- Police Reform and Social Responsibility Act 2011
- Police Act 1996 as amended
- Policing and Crime Act 2017
- Anti-Social Behaviour, Crime & Policing Act 2014
- Crime & Disorder Act 1998
- Police, Crime, Sentencing and Courts Act 2022

Codes and orders:

- Policing Protocol Order 2011
- Revised Financial Management Code of Practice for the Police Service of England & Wales
- Specified Information Order

General legislative requirements:

- Equality Act 2010
- Freedom of Information Act 2000
- Data Protection Act 2018
- Equality and Human Rights Commission Public Sector Equality Duty

Bills and emerging policy:

- Victims Bill
- Proposed legislative reforms linked to the PCC Review

This report has also been informed by the following documents and guidance, as well as the knowledge and experience of the Police Authority Team:

- Association of Police & Crime Commissioners Guide for PCCs
- Association of Police & Crime Commissioners Equality Framework
- National Police Chiefs' Council / College of Policing Race Action Plan
- Association of Police & Crime Chief Executives Police and Crime Plans Guidance
- Association of Police & Crime Chief Executives Statement on the Role of the Chief Executive and Monitoring Officer
- Chartered Institute of Public Finance and Accountancy Guidance on the Role of Chief Finance Officers in Policing
- Legally Qualified Chairs Handbook
- Independent Office of Police Conduct Statutory Guidance on the Police Complaints System
- Independent Custody Visiting Association Quality Assurance Framework
- City of London Internal Audit Management Report May 2022
- City of London Policing Plan

EXECUTIVE SUMMARY

- The Police Authority has been fulfilling most of its core functions but there is room for improvement. Management of complaint reviews and responses to Her Majesty's Inspectorate of Constabulary Fire & Rescue Services (HMICFRS) inspections can be improved to avoid a potentially negative impact on public confidence in policing, and stakeholder confidence in the Police Authority. Processes are being put in place to deliver these improvements, and there will be greater accountability to the Director and Police Authority Board on these areas of performance.
- The Police Authority must have a greater focus on crime prevention given its role in ensuring efficiency and effectiveness. While most force areas span multiple local authorities, integration of local authority community safety and police authority activities should be much less complex in the City. The Police Authority should take a more active role in influencing and supporting crime prevention. This brings it in line with PCC functions and government policy ambitions to strengthen their role and influence in crime prevention. As a minimum, this should include some oversight of the Safer City Partnership (the City's community safety partnership) by the Police Authority Board, advocating for sustainable funding for the Community Safety team, and closer working at an officer level through some shared functions such as analysis and community engagement. It could also consider structural reform to bring Police Authority and Community Safety under combined Corporation leadership and/or governance.
- The role of PCCs in fostering greater public confidence in the police is being strengthened and developed. While Members represent the views of their communities, the Police Authority has been primarily reliant on the police for its community engagement. The implementation of the new Police Authority team operating model provides opportunity for it to take a more active role in engagement. This includes understanding where its engagement is, or is not representative. This should be aligned to a wider Corporation community engagement strategy which is under development. Ideally this would be supported by centralised access to internal and external data sources and a professional lead for analytical capabilities across the Corporation.
- The above includes engaging with and understanding victim views. Putting the victims at the heart is a Policing Plan priority. The Police Authority should work with City of London Police (COLP) to develop a joint victim strategy. This could, for example, include Police Authority engagement with victims through a victim champion, and improved oversight of how effectively support services for City victims commissioned by COLP, the Community Safety team and Mayor's Office of Policing & Crime (MOPAC), are meeting people's needs.
- The Police Authority should take more of an active role in setting the forward plan and agenda for its governance boards and committees, in collaboration with COLP. For key agenda items, there should be opportunity for Police Authority officers to review papers in advance of submission, to help ensure Members are getting the information they need. The Police Authority should work with COLP to review its framework for scrutiny, including standing agenda items, to ensure oversight of all key areas and alignment with good practice across other police oversight bodies.
- Once COLP internal governance has been finalised, there should be consideration of the role of Police Authority officers as observers on key strategic boards. The same should be done for the London regional governance led by MOPAC where it impacts the City (eg the London Criminal Justice Board). A learning and development programme is being developed for both Members and the Police Authority Team to assist them in their roles.

- The Police Authority has a financial assurance framework established in January 2021. It covers medium term financial planning, revenue and capital budget setting, budget monitoring / out turn reporting, value for money assessment and financial control and management capabilities. The primary focus of the Police Authority has been on core grant. The quality of information provided to the Police Authority Board and COLP's ability to align funding and resources has been improving. There is scope for greater scrutiny of and strategic direction from the Police Authority on other funding strategies and opportunities, and allocation of Asset Recovery Incentivisation Scheme (ARIS) funding.
- The key responsibilities contained within this document form a base for regular review of how the Police Authority is complying with expectations and legislation. As legislation affecting the roles and responsibilities of policing and PCCs is continuing to evolve, the Police Authority should implement a structured approach to horizon scanning to enable it to (a) establish policy positions and influence the development of legislation and (b) ensure it is effectively planning for implementation of new requirements.

MAIN RESPONSIBILITIES:

1. [Crime &] Policing Plan <ul style="list-style-type: none">• Issue a [Crime &] Policing Plan incorporating the views of its communities and having due regard to the Strategic Policing Requirement• Scrutinise, support and challenge the overall performance of the force including against priorities agreed within the Plan	Assessment: Compliant
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Overview

City of London has policing priorities which inform the activities of COLP. The Policing Plan takes account of the Strategic Policing Requirement. Community views are gathered through police-led engagement and contributions from Members, as representatives of their communities. There is some consultation with other Corporation departments, led by the police. The Police Authority Team relies on the force's engagement to obtain community views and Member representation.

Processes are in place to issue a plan every 3 years along with an annual refresh. Consultation commences in the Autumn, a draft plan is submitted to Police Authority Board in December for comment with the final version submitted for sign off in March. Performance against the priorities agreed in the plan are monitored through SPPC.

Recommendations

Improve insight into community views by using and gathering information from wider Corporation engagement channels and ensure views are representative of the range of communities (see section on community engagement below)	To be implemented for the Policing Plan refresh commencing in 2023
Review and implement processes to support Ward Members to gather and contribute the views of their communities to policing priorities	To be incorporated into current Policing Plan refresh (Autumn 2022)
Implement processes to lead Corporation consultation on policing priorities to ensure strategic alignment across departments	To be incorporated into current Policing Plan refresh (Autumn 2022)
Create greater strategic alignment between the activities of the Police Authority Team and COLP by incorporating how the PA will support delivery of these priorities in its business plan	To be incorporated into current business planning process (Winter 2022/23)

Emerging policy

- A new Strategic Policing Requirement is expected to be published in 2022
- The Home Office intends to legislate to introduce a new reciprocal duty for PCCs and Regional Probation Directors to consult one another when developing priorities for their Policing and Crime Plans and Regional Reducing Reoffending Plans respectively.

2. Appoint, suspend or remove the Commissioner

Assessment:
Compliant

Overview

The power to appoint and remove the Commissioner is contained within the City of London Police Act 1839 and the Police Authority / Court of Common Council has appointed all City of London Police commissioners to date. The removal of the City Police Commissioner is governed by s.3 which states *“and Her Majesty, or the Court of Mayor and Aldermen, may remove the said Commissioner, if She or they shall see Occasion so to do, for Misconduct or other reasonable Cause”*. However, it does not detail the process that should be followed.

The Commissioner has an annual Performance Appraisal with the Town Clerk, who seeks feedback from the Chair of the Police Authority Board and other stakeholders.

Recommendations and emerging policy

The recent internal audit recommended the standing orders of the Court of Common Council were updated to reflect the Court's legal power and duty to remove Commissioner where required.

This was based on their review of the Policing Protocol 2011 which states that a *“PCC has the legal power and duty to:.... (f) remove the Chief Constable subject to following the process set out in Part 2 of Schedule 8 to the 2011 Act and regulations made under section 50 of the Police Act 1996(3);”*. However, Schedule 8 does not apply to the City of London.

The PCC Review recognised there is a lack of transparency and rigour to current processes for suspending or removing chief constables. In 2017 the chief constable of South Yorkshire successfully challenged his removal by the PCC in the High Court. The Court determined the PCC decisions were irrational and therefore unlawful. More recently, the government commissioned a review of how the Metropolitan Police Commissioner came to leave office.

The PCC Review includes a commitment for the Home Office to legislate to amend Section 38 of the Police Reform and Social Responsibility Act 2011, to make the Chief Constable dismissal process more rigorous and transparent, by requiring a PCC to give the Chief Constable written notice (including grounds), as the first stage of the dismissal process; allowing for the Chief to provide Her Majesty's Inspector of Constabulary Fire & Rescue Service with a response to those grounds; and introducing some form of time limit or review interval on a Chief Constable's suspension from office. The Home Office will also work with the College of Policing, National Police Chiefs' Council and Association of Police & Crime Commissioners to develop a framework for the use of independent mediation in appropriate circumstances.

To address the internal audit recommendation once nationally-led work to legislate and develop processes for removal of chief constables has been completed.

Not to commence until national policy has been developed

<p>3. Complaints and reviews</p> <ul style="list-style-type: none"> Responsible for complaints against the Commissioner (to be investigated by IOPC) and appeals/reviews of less serious misconduct cases (IOPC handles serious cases). Complainants must be updated on progress every 28 days. 	<p>Assessment: Partially compliant</p>
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Overview

The Police Authority Team has a dedicated officer for managing complaints and reviews and making recommendations to a Member led panel on the outcome of these reviews. Effective management of complaint reviews and complaints against the Commissioner is an important part of the Police Authority's contribution to public confidence.

There has been a lack of oversight and accountability for the delivery of this function. Timeliness of dealing with complaints has not always been good and complainants have not always received their statutory 28 day updates on progress.

The Police Authority receives approximately 20-25 review requests a month of which around a quarter meet the requirements for review and fall within the remit of the City of London.

In May 2022 there were 6 reviews outstanding with 4 more than a year old. As at end of July 2022, 4 of these outstanding reviews have been finalised.

The average number of days to process complaints/reviews varies across force areas. Resolution can be impacted by response times from other parties. However, the Police Authority Team has set an ambition to process all reviews within 28 days and will diarise monthly panel review meetings to ensure timeliness of decision making by Members. Where this is not achievable the Police Authority commits to providing updates on progress to complainants every 28 days.

Recommendations

Implement a system for recording and monitoring status of complaints and reviews to improve management of processing and updates	Complete
Develop a monthly dashboard report to the Director of the Police Authority to improve oversight of performance	Complete
Submit an annual report to Police Authority Board in February each year covering both COLP and PA performance on complaints	Incorporated into PAB standing agenda items
Publish complaints performance data on the Police Authority website (Statutory Information Amended Order 2021)	February 2023
Update the Police Authority website to improve signposting for complainants and implement an online form for requests to ensure all relevant information is captured, reducing delays and demand caused by the need to make secondary contact.	Autumn 2022

4. Operate an Independent Custody Visitor scheme	Assessment: Compliant
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Overview

The Police Authority Team has an officer with responsibility for administering and managing the Independent Custody Visiting (ICV) scheme, and a Member with responsibility for scrutiny. The Police Authority is a member of the Independent Custody Visiting Association (ICVA) which provides guidance and good practice for scheme managers.

ICV panel meetings are held quarterly to review custody usage figures and discuss visits undertaken across custody in the previous quarters. Meetings provide ICVs with the opportunity to highlight any issues of concern and good practice across use of force, strip search and the provision of mental health support.

An annual report is submitted to the Police Authority Board on the ICV scheme which includes response to HMICFRS recommendations, work undertaken by the panel and priorities for the following year.

The ICVA operates a Quality Assurance Framework (QAF) for schemes which is assessed bi-annually. There are four categories – compliant, silver, gold and platinum. The Police Authority was graded silver in the last assessment (2018). This is considered a good standard.

Following a pause in the QAF due to Covid, the next assessment period will run from 1 April 2022 to 30 September 2023. The Police Authority aim is to maintain its Silver status in the next assessment.

Recommendations

While the Police Authority is not currently aiming for the QAF Gold status, to review the ICVA QAF to understand which Gold standard elements it may wish to implement (taking into account level of resource versus additional benefit to detainee welfare)	November 2022
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Emerging policy

National Police Chiefs' Council and the Association of Police & Crime Commissioners are developing an Independent Scrutiny Panel concept to address disproportionality in police custody (piloted in Thames Valley). The aim is to complement existing police custody scrutiny (ie ICVs and HMICFRS) and for it to fall under the governance of PCCs.

<p>5. Police misconduct panels and police appeals tribunals</p> <ul style="list-style-type: none"> Recruit Legally Qualified Chairs (LQCs) and Independent Panel Members (IPMs) for police misconduct panels Nominate a chair and lay member from the pool to sit on panels Nominate a tribunal judge and independent lay member (where appropriate) for police appeals tribunals and run the process 	<p>Assessment: Compliant</p>
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Overview

Police misconduct panels

The London region panel for LQCs and IPMs is run by MOPAC. The Police Authority was involved in the recruitment process and makes a financial contribution to the service. The Police Authority selects the chair and panel, and the force runs the process. When selecting the panel, the Police Authority considers availability and spread of work across members. Where police misconduct panels are being conducted under old regulations, COLP selects the chair and panel (via the Police Authority).

Police appeals tribunals

The Police Authority selects a tribunal judge from a national list, and secures a chief officer from another force and COLP. The Police Authority runs the process including sourcing a venue.

Recommendations

The Authority should negotiate an agreed protocol with COLP for handling the logistics of any Police Appeals Tribunal, including venue, facilities (e.g. recording equipment) and assistance with escorting panel members, legal teams, witnesses and members of the public	October 2022
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Emerging policy

- In 2018 a concern arose regarding the indemnity wording agreed with LQCs. As a result, most LQCs are refusing to sit on misconduct panels until the wording of their indemnity is changed. The National Association of Legally Qualified Chairs (NALQC) is looking for reasonable immunity from suit and is not prepared to settle for indemnity alone. The Home Office will only consider indemnity against costs arising from suit and will not consider immunity. Most PCCs are providing an indemnity for the next 2 years although NALQC is concerned PCCs are not evidencing they can afford the indemnity. Many LQCs are approaching the end of their 8 year term so there is likely to be difficulties in recruiting. The Police Authority's position has been to write to an LQC when needed, offering them indemnity for the case.
- Under the new Race Action Plan, panel chairs will be required to undertake anti-racism training, and there will be an assumption of seeking panel members from an ethnic minority where race is considered a factor, or the officer is from a visible ethnic minority.

6. Respond to HMICFRS and Home Secretary within 56 days of publication of HMICFRS inspection reports

Assessment: Non-compliant

Overview

This is an important part of providing assurance that the Police Authority is scrutinising COLP's delivery of policing services. Comments of the Police Authority and Commissioner must be published within 56 days of publication. If the report includes a recommendation, the Police Authority response must include an explanation of:

- the action the Police Authority has taken or proposes to take in response to the recommendation
- an explanation of why the Police Authority has not taken or does not propose to take any action in response

To streamline this process, HMICFRS established an online recommendations register enabling the Police Authority to enter their response direct to the database. The database is also accessible to the Home Office, satisfying the requirement to respond to the Home Secretary. The Police Authority Team has now secured access to this register.

More generally, there is scope for the Police Authority Team to take a more proactive role in monitoring upcoming inspections and engaging with HMICFRS.

Recommendations

Implement processes with COLP to improve planning for and responding to HMICFRS inspections	September 2022
Incorporate compliance monitoring within Police Authority KPIs	Autumn 2022

Emerging policy

NPCC recently decided PCCs should no longer be involved in HMICFRS set-up meetings and hot debriefs. The timescale / process for implementation of this is not currently clear. The role of the Police Authority will need to be clarified and agreed with COLP for upcoming inspections.

7. Publication of specified information on PCC performance and force performance and Freedom of Information Act (FOIA) scheme	Assessment: Partially compliant
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Overview

PCCs are required to publish certain information to allow the public to hold them to account. The Elected Local Policing Bodies (Specified Information) Order 2011 ('the Order') sets out the information that must be published. An amendment to the order came into force on 31 May 2021 requiring that information relating to the force's performance against the Government's national priorities for policing, Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) performance reports on the force, and complaint handling must also be published. The Amended Order specifies this information must be published in a prominent place on the Police Authority's website.

There is partial compliance with the Specified Information Order 2011 and Amended Order 2021. As the Police Authority is not a legal entity and is part of the wider Corporation, it is not appropriate to publish all of the information set out in the Order at a departmental level. However, given the aim of the Order is to improve transparency and public accountability, there are opportunities to improve the information provided. A high level analysis of the gaps can be found at Appendix 2.

The Police Authority is recruiting a Strategic Communications & Engagement Coordinator who will be responsible for updating and maintaining the website.

The Police Authority is covered within the Corporation FOIA information scheme [Freedom of Information Act 2000 - City of London](#).

Recommendations

Review and update the police authority website to ensure compliance with the Statutory Information Order and Amended Order where appropriate and improve accessibility of information by the public	December 2022 (dependent upon recruitment)
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<p>8. Engage with the public including:</p> <ul style="list-style-type: none"> ○ consulting on setting police and crime objectives ○ engaging on budget proposals annually ○ obtaining views of victims of crime 	<p>Assessment: Partially compliant</p>
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Overview

Public engagement is an element of the PCC role linked to improving public confidence. Community engagement is currently led by COLP. With the recruitment of a Strategic Communications & Engagement Coordinator and Analyst, there is scope for the Police Authority to step up its engagement and understanding of its communities.

Effective community engagement requires insight into the demographics of the community and which channels they engage with. It requires monitoring which groups are engaging with current processes, which groups are under represented, and implementation of action to ensure all voices are heard.

There is a lack of understanding within the Police Authority of its community profile, beyond generic groups (residents, workers, businesses etc) and volumes. This means it does not have a clear understanding of whether it is hearing all its communities, making it challenging to ensure diversity and inclusion is embedded within its decision making.

Public engagement is fragmented across the Corporation. Data sits across multiple departments with no central repository or analysis. At an organisational level, there is no professional lead for analytical capabilities or a clear business intelligence / data strategy.

Officers in the Corporation are currently working on a new community engagement strategy for Policy & Resources Committee. This is primarily to achieve improved turn out for elections but will inform a broader engagement strategy. The strategy will include recommendations on segmentation, targeting (channels), and monitoring and data requirements. The Police Authority team has fed in its requirements and will engage with this process as it is developed.

Setting police and crime objectives

See section 1 above. The main mechanisms for local public engagement and consultation on police and crime objectives are force-led cluster panels and an annual community survey which informs the Policing Plan. These are led by COLP. There is Member representation on Police Authority governance boards and it is expected that they represent the views of their Wards. The Safer City Partnership also engages with the local community on its priorities.

Engaging on budget proposals

The Police Authority does not consult on budget proposals unless there is a new impact on local taxation (ie increase in Business Rate Premium). Budget proposals are scrutinised through Police Authority Board and its Resources, Risk & Estates Committee, which are public meetings. Budget information is published in the Annual Report and Policing Plan. It is considered that the current level of engagement on budget proposals is sufficient.

There is also a requirement to publish its reserves policy. This is being developed (see section 15) and will be published on the PA website in due course.

Obtaining views of victims of crime

Victim surveys are undertaken by COLP and reported through Police Authority governance. The main mechanism for engagement with the City's national communities is through Action Fraud and, currently, the Next Generation Fraud and Cyber Reporting & Analysis Project. The Police Authority is not involved in this.

Recommendations

Establish capabilities to improve understanding of the size and demographics of the different community groups across the City, ensure information about local communities/protected characteristics needs and outcomes is regularly updated and used to inform the Police Authority's equality objectives and other priorities	Spring 2023 (dependent upon resources and to be linked to wider CoL engagement strategy)
Develop and implement an inclusive community engagement strategy, including systems for monitoring which groups COLP and the Police Authority are engaging with, and which groups are underrepresented, making recommendations for remedial action when required	Spring 2023 (dependent upon resources and to be linked to wider CoL engagement strategy)
Work with Corporation colleagues to coordinate engagement activity to enable community views to be captured using a range of different channels and information to be shared across all relevant departments	Spring 2023 (dependent upon resources and to be linked to wider CoL engagement strategy)
Develop a joint victim strategy with COLP including how the Police Authority captures views of victims	Autumn 2022

Emerging policy

- As a result of the PCC Review there is a desire for PCCs to work with their communities to foster greater public confidence in the police. The core PCC guidance will be amended to reflect the PCC role in securing and maintaining public confidence in policing and tackling crime and anti-social behaviour. This will require the Police Authority to take a more proactive and structured approach to its engagement, and draw on best practice for engaging communities and building public confidence.
- The Draft Victims' Bill proposes creating a duty for specified criminal justice bodies and PCCs to take into account victims' experiences

9. Secure the maintenance of an efficient and effective force (including value for money) and hold the Commissioner to account	Assessment: Compliant
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Overview

The formal governance of the Police Authority is through the Police Authority Board, which reports to the Court of Common Council. The Police Authority Board has four committees:

- Strategic Planning & Performance
- Resource, Risk & Estates
- Professional Standards & Integrity
- Economic and Cyber Crime

An overview of the current standing agenda items is attached at Appendix 3.

The Police Authority has a range of mechanisms including:

- Public accountability meetings through Police Authority Board and its Committees
- Private accountability meetings through Police Authority Board and its Committees
- Formal reports through Police Authority Board and its Committees (requires review)
- Attendance by police authority staff at police governance / scrutiny meetings (requires review against new governance structure)
- Weekly private informal meetings between the Police Authority Chair, Director of Police Authority and Chief Officer Team
- HMICFRS reports
- Policing Plan performance framework
- Value for money (financial framework)

Assurance is through a combination of Member scrutiny and officer engagement. In line with the internal audit recommendations, the Police Authority is establishing a professional development programme for Members to assist them in their role. A training needs assessment will be undertaken. The Police Authority Team will engage with the Association of Police and Crime Chief Executives and College of Policing to develop their own professional development programme.

Police Authority scrutiny is reliant on the quality of information provided by COLP which is improving. The Police Authority Team is recruiting an analyst which will enable a more data-led and evidence based approach to assurance and decision making. For key agenda items, there should be opportunity for Police Authority officers to review papers in advance of submission, to help ensure Members are getting the information they need to focus on strategic issues.

Specific areas of focus for PCCs set out in the Police & Social Reform Act (PSRA) and the Police Authority oversight mechanisms linked to this are set out below.

PSRA Requirement	Oversight mechanism
Duty to have regard to the Police & Crime Plan	SPCC / Policing plan measures
Duty to have regard to Strategic Policing Requirement	SPCC / Policing plan measures
Duty to have regard to codes of practice issued by Secretary of State	Requires review further analysis
The effectiveness and efficiency of arrangements for co-operating with other persons (whether under section 22A of the Police Act 1996 or otherwise)	Annual ethical partnerships paper provided to PAB. Potential gap in respect of London regional collaboration
The effectiveness and efficiency of engagement with local people	Requires further analysis
Exercise of duties relating to equality and diversity	<p>Primarily delivered through PS&IC. Focus on understanding disproportionality linked to use of powers and scrutiny of delivery of Equality and Inclusion Strategy. Gaps in understanding of disproportionality linked to police misconduct / complaints, victim support and commissioned services - in part due to data limitations.</p> <p>A self-assessment against the APCC Equality Framework which was developed to help PCCs hold Chief Constables to account and improve public trust, indicates the Police Authority is at the low end of the maturity scale (developing) for understanding and working with its communities. This impacts its ability to understand disproportionality. The assessment for leadership and organisational commitment showed it was achieving against some areas of the framework but there is still scope for improvement in others.</p>
Exercise of duties in relation to the safeguarding of children and the promotion of child welfare that are imposed on the chief constable by sections 10 and 11 of the Children Act 2004	<p>SPPC / Policing Plan measures around multi-agency safeguarding plus HMICFRS</p> <p>Multi-agency safeguarding is governed through Children and Community Services. Agenda items such as the annual reviews of the safeguarding boards should be considered for PAB.</p>

The Police Authority should take more of an active role in setting the forward plan and agenda for its governance boards and committees, in collaboration with COLP. This should include regular review of the governance framework and benchmarking against statutory requirements and good practice by other police oversight bodies.

For key agenda items, there should be opportunity for Police Authority officers to review papers in advance of submission, to help ensure Members are getting the information they need.

Recommendations

Professional development programme for Police Authority officers and Members to improve ability to understand and scrutinise policing	Autumn 2022
Review scrutiny framework and standing agenda items to Police Authority Board and its Committees against statutory obligations, and benchmark against other police oversight bodies	October 2022
Implement processes for future agenda planning for Police Authority Board and its Committees	October 2022
Map Police Authority officer attendance across COLP governance to ensure appropriate representation at internal scrutiny meetings	October 2022
Develop and extend the financial assurance framework submitted to Police Authority Board in January 2021 to cover wider assurance around efficiency and effectiveness and value for money	Spring 2023 (linked to new national guidance and good practice)
Develop a plan based on the APCC equality framework and Race Action Plan to improve delivery of equality objectives and scrutiny including consideration of how the authority engages with independent advisory scrutiny groups	Autumn 2022

Emerging policy

The recent PCC review highlighted challenges in understanding performance and efficiency. The Home Office has committed to working with HMICFRS and the wider policing sector to develop a police efficiency dataset and improve the ability to interpret differences between forces to help drive efficiencies. This was highlighted in the Internal Audit report.

OTHER RESPONSIBILITIES

PCCs have a range of roles beyond oversight of policing. These are linked to crime prevention and community safety.

<p>10. Community safety partnerships (CSP):</p> <ul style="list-style-type: none">• the PCC and CSP must have regard to each other's priorities within their plans. This should encourage joint working on mutual priorities, and ensure that the PCC priorities are tackled at the local level, and the CSP priorities are reflected and resourced• the PCC has a power of accountability over CSPs, they can call in representatives of CSPs in the force area to a meeting to discuss strategies to reduce crime• the PCC can request a written report from a CSP• PCCs can approve mergers between CSPs (many have already merged), but cannot dictate mergers• PCCs can make grants to CSPs for the reduction of crime and disorder (but are under no obligation to do so)	<p>Assessment: Partially compliant</p>
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Overview

Priorities

The Police Authority is a member of the City's community safety partnership, known as the Safer City Partnership (SCP). The SCP new strategy has been developed having regard to the Policing Plan priorities. The Policing Plan does not reference how it has considered the SCP priorities. The most recent public consultations on priorities for the Policing Plan and SCP were undertaken independently of each other.

Structures and accountability

The focus of the Police Authority has been primarily on policing with the Community Safety Team in the Department for Children & Community Services taking the lead on crime prevention. The Police Authority cannot be assured policing is efficient and effective and its community is safe unless there is a focus on crime prevention. This extends beyond COLP.

The Police Authority should take a more active role in influencing prevention of crime and anti-social behaviour, bringing it more in line with the PCC approach and government policy ambitions to further strengthen the role of PCCs in this area.

While most force areas span multiple local authorities, integration of local authority community safety and police functions are much less complex in the City. Having the Police Authority and Community Safety functions under combined leadership could improve the overall effectiveness of both functions and bring crime prevention higher up the Corporation's political agenda and priorities.

The Police Authority team is developing a closer working relationship with the Community Safety team. It has agreed to share its analytical and strategic communications and engagement resources to support the work of the Community Safety team to provide a more integrated approach. The Police Authority team will have a seconded police officer who will have specific responsibility for crime prevention and community safety, working as part of the SCP.

The SCP governance has recently been reviewed. The Crime & Disorder scrutiny board has oversight of the SCP. It is Member chaired and should include a Police Authority Board Member. There is a Strategy Group which is officer chaired (COLP). The Police Authority is represented on this group. Thematic delivery groups aligned to the SCP priorities will also include Police Authority officers.

Grants

The Police Authority has historically awarded 10% of the funding it receives through the Proceeds of Crime Asset Recovery Incentivisation Scheme to the SCP to be used at the discretion of the SCP. The SCP has allowed its members to bid for the money, as well as community groups who support SCP strategic priorities. There has been limited accountability to the Police Authority for the use of these funds.

The SCP is professionalising its approach to management of the funding process. It has established a panel with its statutory partners, chaired by the Director of Police Authority to make decisions on how the funding is awarded. A funding strategy is being developed in consultation with partners which will take into account of the deliverables within the new SCP strategy. The SCP will use the Corporation Central Grant Unit to manage its grants.

Recommendations

Bring together the two separate processes for consulting the public on SCP and policing priorities to reduce consultation fatigue and maximise the reach of consultation engagement – this may require synchronisation of planning and publication timetables	To be implemented for the Policing Plan refresh commencing in 2023
Police Authority Board should commission an annual report from the Safer City Partnership	Incorporated into PAB standing agenda items (September 2023)
Develop a new approach to allocation of ARIS funds to SCP and improve transparency of how it is used	Winter 2022/23

Emerging policy

- The PCC review seeks to strengthen the role of PCCs in bringing together partners to prevent crime. A review of community safety partnerships has been commissioned to identify how partnerships can increase their overall effectiveness to better protect their local communities from crime and anti-social behaviour. PCCs are likely to campaign for greater influence over these bodies.
- The new drugs strategy requires the establishment of local combating drugs partnerships from 1 August 2022 in which it is expected there will be police and PCC representation. This is in addition to community safety partnerships.

11. Involvement in ASB community triggers	Assessment: Compliant
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Overview

The Police Authority Chair was consulted on the community trigger procedure when it was set up, and arrangements are in place for them to be consulted whenever the procedure is reviewed.

There is scope for PCCs to be directly involved in the community trigger, for example by:

- auditing case reviews
- providing a route for victims to query the decision on whether the threshold was met or the way a community trigger review was carried out
- Monitoring use of the community trigger to identify any learning and best practice

Within the current process, the Police Authority is not directly involved in the community trigger.

Recommendations and emerging policy

Through the review of community safety partnerships, the Home Office is considering introducing a new duty for these partnerships to report on local anti-social behaviour strategy and delivery to PCCs. It is also considering legislating to set out the PCC role in the Community Trigger process. It is recommended that the role of the Police Authority in the community trigger is reviewed at this time.

Overview

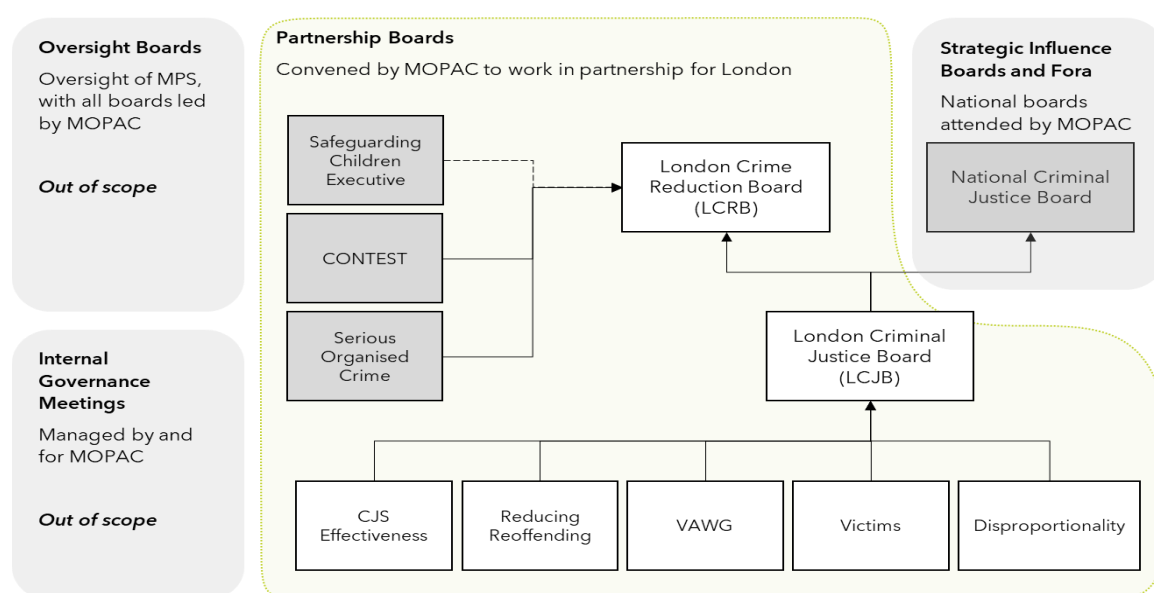
The City does not have its own Local Criminal Justice Boards. It is included within the London Criminal Justice Board (LCJB). London criminal justice data covers both City of London and the Metropolitan Police area. The Police Authority is not represented on the London Criminal Justice Board. This has previously been chaired by the Metropolitan Police and COLP has been represented.

MOPAC is developing a new approach to the LCJB and intends to chair a strategic board with partners to improve crime and justice outcomes for London by:

- Setting strategic direction and coordinating system-wide partnership action for improving the London criminal justice system
- Providing a senior partnership forum under the London Crime Reduction Board
- Overseeing other partnership boards
- Defining a performance framework aligned with the London Police and Crime Plan and the National Criminal Justice Board for criminal justice partnership work.

To do this, the board will:

- Agree, coordinate, and monitor partnership activities
- Define a single performance framework informed by the Police and Crime Plan to guide the strategic coordination of the partnership boards
- Delegate and refer criminal justice issues as necessary to other boards or partners
- Monitor partnership board progress on performance indicators
- Monitor and report on crime and justice outcomes and related partnership activities to the London Crime Reduction Board
- Provide a connection with the National Criminal Justice Board and national issues.



Given putting victims at the heart a Policing Plan priority, the LCJB will be responsible for overseeing COLP compliance with the Victim Code of Practice (see below), and MOPAC provides victim services commissioning on behalf of the City, there would be benefit in the Police Authority being represented within this governance.

Recommendations

Engage with MOPAC to understand how the Police Authority should be represented in its pan-London governance	Autumn 2022
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Emerging policy

- Following the PCC review options for legislation to put Local Criminal Justice Boards on a statutory footing are being explored. This includes defining the role of the PCC as Chair and setting out the expected membership (including the Crown Prosecution Service, Her Majesty's Courts and Tribunals Service and the Probation Service).
- The draft Victims Bill places a duty on PCCs and local criminal justice bodies to review compliance with the Victims' Code of Practice. The duty is placed on local criminal justice bodies to enable PCCs to take the role of overseeing compliance with the Victims' Code within each police area. This effectively makes MOPAC responsible for monitoring COLP compliance with the Code, as chair of the LCJB. Consideration will need to be given to how Action Fraud fits within this scope and creates a more compelling reason for the Police Authority to be represented on the LCJB.

13. Commission victim support and crime reduction services: <ul style="list-style-type: none"> • Victim support • Reducing re-offending • Serious violence • Crime prevention • Alcohol and substance misuse services • Early intervention • Community safety 	Assessment: Partially compliant
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Overview

The Police Authority does not directly commission victim support or crime reduction services and does not have commissioning capabilities. Some of the above services are commissioned through Police Authority partners.

Funding for commissioning of these services is usually from the PCC budget but can also be funded through government grants.

The Corporation's over-arching commissioning strategy for victim support and crime reduction services is unclear. Oversight of commissioned services is fragmented across departments or does not exist.

The Community Safety team commission the following services, none of which have permanent or sustainable funding:

- Anti-social behaviour controls – Parkguard was first commissioned to help the City Estates (excluding the Barbican which did not make an economic contribution). The Citywide contract was trialled for a year. The Community Safety team would like to extend the service to run in the night time economy hours as well (after 00:00).
- Bangladeshi victim advocate – 4% of the City's population is Bangladeshi. This is a 3 day a week contract with Solace to help and support victims of domestic abuse or other violence against women and girls in the City, to address circumstances where language and culture can be a barrier when reporting and accessing services.
- Counselling for victims of domestic abuse and rape – a service to address an issue where victims of domestic abuse and sexual violence had to wait more than 6 months to access counselling from the NHS. There are 10 places for victims in the City of which 6 have already been used.

The Community Safety team is exploring safe accommodation for domestic abuse victims. There are no perpetrator or early intervention programmes.

Alcohol and substance misuse services are commissioned through the City and Hackney partnership managed by DCSS.

COLP funds a part time vulnerable victim advocate for local victims of domestic abuse. It also receives funding to provide support services to victims who report to Action Fraud and is rolling out delivery of this service to all police forces.

MOPAC receives funding to commission pan-London victim services and they commission some other services which are available for City residents such as the Independent Domestic Violence Advisor service (awaiting full list). The Police Authority has no oversight of these services meaning it cannot be assured they are meeting the needs of its victims. MOPAC is currently developing a new approach to victim services commissioning and has committed to engaging with the Police Authority as part of this process.

Recommendations

The Police Authority should engage with partners to ensure a holistic strategy for commissioned services and implement processes to assure services are meeting the needs of the community and local crime profile	Spring 2023
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Emerging policy

- Under the new Police, Crime and Sentencing Act, out of court disposals will change from current 6 tier model to 2 tier only. This essentially scraps cannabis warnings, PNDs, FPNs and simple cautions, and moves to diversionary and community cautions only. At present the target date is 1 April 2023.

The new diversionary and community cautions will require conditions to be attached, which should be rehabilitate or reparatory. The purpose being to divert offenders away from the criminal justice system and deal with root cause of offending and recidivism. As such, the City will require a selection of diversionary programmes to offer as conditions. There may be opportunity to commission on a pan-London basis. The Police Authority and COLP have engaged with MOPAC, MPS and the British Transport Police. It is not clear how this will be funded.

- The draft Victims Bill:
 - Places a duty on specified authorities (including local authorities, PCCs and Integrated Care Boards) to collaborate with each other when commissioning victim support services to facilitate more holistic and better coordinated victim support services
 - Defines Independent Sexual Violence Advisors (ISVAs) and Independent Domestic Violence Advisors (IDVAs), introduces guidance setting out recommended minimum standards and best practice for ISVAs and IDVAs, and place a duty on ISVAs, IDVAs and other persons whose functions relate to victims of criminal conduct, or any aspect of the criminal justice system, to have due regard to this guidance, and how this relates to their role

FINANCIAL RESPONSIBILITIES

14. Hold the police fund and other grants from central and local government and set the local policing precept	Assessment: Compliant
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Overview

Police funding is held within the City Fund. There is no local policing precept in the City.

15. Financial strategy: <ul style="list-style-type: none">• Translate the PCC's plans and priorities into a viable medium term financial strategy• Ensure funding is available from grants, precepts and reserves• Ensure a robust annual budgeting process that enables financial balance and monitoring	Assessment: Compliant
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Overview

A Chief Finance Officer is responsible for the financial strategy. It has been a shared role with the force since February with the intention for this pilot to run through to summer / autumn 2023, followed by review with consideration to formalise. Police Authority independence is maintained by having the Chamberlain retain the role of Police Authority Treasurer.

The core focus of the Police Authority has been in relation to the core grant. There is opportunity for greater transparency and strategic direction from the Police Authority in relation to new funding strategies and opportunities, national lead force funding and receipts from the Asset Recovery Incentivisation Scheme (ARIS).

The Police Authority has a financial assurance framework established in January 2021. It covers medium term financial planning, revenue and capital budget setting, budget monitoring / out turn reporting, value for money assessment and financial control and management capabilities.

The police budget is subject to Finance Committee approval and quarterly monitoring as part of the City fund. Its Efficiency and Performance Sub-Committee does an annual deep dive on police. The capital budget and loan funding is subject to the scrutiny and approval of OPPSC and RASC.

The City Fund is subject to audit as part of the Corporation's wider financial assurance and police funding is covered within the Audit Committee.

Recommendations

The Police Authority to work with COLP and the Community Safety team to agree its strategic approach to tracking and managing new or recurring funding opportunities including private sector funding and government grants	Winter 2022/23
The Police Authority to establish a governance framework for allocation of ARIS funding across COLP and the SCP	Winter 2022/23
The Police Authority to bring forward a more detailed and formalised reserves policy and publish on its website	Autumn 2022

Emerging policy

The Home Office is reviewing the police funding formula. The Police Authority is leading engagement with the Home Office in collaboration with COLP both from a local perspective and to ensure fraud and cyber crime are appropriately recognised in the formula. Due to the change in Ministers this is now unlikely to be implemented for the next settlement.

APPENDICES

Appendix 1: Internal Audit Recommendations and Actions

Ref	Recommendation	Action	Progress
1.	The Police Authority should implement a programme of self-assessment exercises to determine the extent to which its governance and oversight arrangements meet the requirements of the Policing Protocol Order 2011.	<p>The Director of the Police Authority has broadened this recommendation to incorporate other statutory instruments that define the duties of Police & Crime Commissioners.</p> <p>This self-assessment has been completed and will be presented to Police Authority Board in November 2022. The duties contained within it will form a base for regular review of how the Police Authority is complying with all its duties, including governance and oversight arrangements.</p> <p>As legislation affecting the roles and responsibilities of policing and PCCs continues to evolve, the Police Authority is implementing a structured approach to horizon scanning to enable it ensure it is effectively planning to capture and implement new and changing requirements.</p> <p>This document will be reviewed and updated annually and has been incorporated into the Police Authority Board future agenda. The next review will be reported in November 2023.</p>	Completed
2.	The Court of Common Council's Standing Orders should be revised to reflect the Court's legal power and duty to remove the Commissioner of Police, where required.	<p>This recommendation was based on Internal Audit's review of the Policing Protocol 2011 which states that a "<i>PCC has the legal power and duty to:.... (f) remove the Chief Constable subject to following the process set out in Part 2 of Schedule 8 to the 2011 Act and regulations made under section 50 of the Police Act 1996(3);</i>". However, Schedule 8 does not apply to the City of London.</p> <p>The power to remove the Commissioner is contained within the City of London Police Act 1839. The removal of the City Police Commissioner is governed by section 3 which states "<i>...and Her Majesty, or the Court of Mayor and Aldermen, may remove the said Commissioner, if She or they shall see</i></p>	To commence following development of new national policy

		<p><i>Occasion so to do, for Misconduct or other reasonable Cause</i>". However, it does not detail the process that should be followed.</p> <p>The recent PCC Review recognised there is a lack of transparency and rigour to current processes for suspending or removing chief constables and committed to legislate to amend Section 38 of the Police Reform and Social Responsibility Act 2011, to make the Chief Constable dismissal process more rigorous and transparent, by requiring a PCC to give the Chief Constable written notice (including grounds), as the first stage of the dismissal process; allowing for the Chief to provide Her Majesty's Inspector of Constabulary Fire & Rescue Service a response to those grounds; and introducing some form of time limit or review interval on a Chief Constable's suspension from office. The Home Office also intends to work with the College of Policing, NPCC and APCC to develop a framework for the use of independent mediation in appropriate circumstances.</p> <p>To align with national developments, the Director of the Police Authority will review this recommendation once nationally-led work to legislate and develop processes for removal of chief constables has been completed and make recommendations for implementation.</p>	
3.	The Police Authority's Financial Framework should be enhanced by adopting the Home Office's proposed approach for assessing the efficiency of Police Forces, as identified from its review into the role of Police and Crime Commissioners.	This recommendation will be implemented when Home Office guidance is published.	Awaiting Home Office guidance
4.	The Police Authority should align arrangements for reviewing the risk registers for both the Police Authority Board and City of London Police, with the requirements of the City's Risk Management Policy and Strategy.	Risk registers for the Police Authority and COLP will be reported to RREC quarterly and have been incorporated into the future agenda plan.	Completed

5.	Police Authority Officers should support the Police Authority Board and its Committees in undertaking a skills and experience assessment audit, developing a training plan to address any identified gaps.	Under the Civic Affairs Committee, a rolling learning and development programme for all Members covering the knowledge and skills required to assist them in conducting their role as Committee Members and Ward Councillors is being developed. The Police Authority is contributing to this programme by identifying the knowledge and skills required for the Police Authority Board and its Committees.	In progress. To be completed by October 2022
6.	The Police Authority should explore the extent to which the City of London Corporation should operate a Local Criminal Justice Board.	<p>The City is included within the London Criminal Justice Board led by MOPAC. London criminal justice data includes both City of London and the Metropolitan Police area and it is not always possible to disaggregate. This approach has been confirmed as appropriate by the Association of Police and Crime Commissioners and the Home Office.</p> <p>The Police Authority is engaging with MOPAC to discuss the role Police Authority on this board. This action is covered in the Police Authority review highlighted in recommendation 1 above.</p>	Completed
7.	The Police Authority should establish an appropriate framework through which the City of London Police can report to Members on the extent to which it continues to comply with the Data Protection Act 2018.	<p>COLP's Information Management Services department oversees the day-to-day governance and compliance requirements of the Data Protection Act (DPA) and its Data Protection Officer is required by law to undertake monitoring and hold the organisation to account for its compliance with the Act. COLP has an Information Management Board which meets quarterly to monitor compliance with FOIA and DPA.</p> <p>COLP's Information Management Board will provide an annual dashboard on DPA and FOIA compliance to RREC each May, highlighting any areas of concern or improvements implemented over the course of the year. This has been incorporated into the future committee agenda plans.</p> <p>Findings from internal and external audits (eg Information Commissioner's Office) will also be reported to RREC when available, along with quarterly updates on progress of recommendations.</p> <p>In the event of a data breach resulting in COLP declaring a critical incident, this would be reported to the Police Authority Board Chair and Chief Executive in line with existing practices.</p>	Complete

Appendix 2: Specified Information Order

Purpose: The public should be able to easily access information on City of London Police performance and the work of the Police Authority Board. The Amended Order provides that information relating to the force's performance against the Government's national priorities for policing, HMICFRS performance reports on the force, and complaint handling must also be published. The Order also specifies that this information must be published in a **prominent place** on the elected local policing body's website.

Legislation: [The Elected Local Policing Bodies \(Specified Information\) Order 2011 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

Amended: [The Elected Local Policing Bodies \(Specified Information\) \(Amendment\) Order 2021: guidance for police and crime commissioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

REQUIREMENTS	COMPLIANCE
2011 Order	
<p>In relation to the relevant office holders of the elected local policing body—</p> <p>(a)the name of each relevant office holder;</p> <p>(b)the address for correspondence of each relevant office holder;</p> <p>(c)the salary of each relevant office holder;</p> <p>(d)the allowances paid to each relevant office holder in respect of expenses incurred by the office holder in the exercise of the body's functions;</p> <p>(e)a register of interests of relevant office holders, including every paid employment or office or other pecuniary interest of each relevant office holder.</p> <p>(f)the number of complaints or conduct matters that have been brought to the attention of a relevant office holder by the police and crime panel (either because they have been referred to the Independent Police Complaints Commission, or because they are being subjected to informal resolution by the panel).</p>	<p>Board member details, contact detail and register of interests included in CoL Member pages</p>

REQUIREMENTS	COMPLIANCE
<p>2. In relation to the staff (and, in relation to gifts and hospitality, also the relevant office holders) of the elected local policing body—</p> <p>(a) the number of members of the staff;</p> <p>(b) the proportion of the staff who—</p> <p>(i) are women,</p> <p>(ii) are, to the knowledge of the elected local policing body, members of an ethnic minority,</p> <p>(iii) have, to the knowledge of the elected local policing body, a disability (within the meaning of section 6 of the Equality Act 2010⁽¹⁾);</p> <p>(c) an organisational chart showing the structure of the staff;</p> <p>(d) the job title, responsibilities and salary of each senior employee and (unless the senior employee refuses to consent to the publication of his name) the name of the senior employee;</p> <p>(e) a register of each offer of a gift or hospitality made to a relevant office holder or member of staff, indicating whether the offer was accepted or refused.</p>	<p>Does the Corporation publish this information at an organisational level? Not required for authority as less than 150 employees</p>
<p>3. In relation to the income and expenditure of the elected local policing body—</p> <p>(a) the total budget of the elected local policing body;</p> <p>(b) where the elected local policing body is a police and crime commissioner, the precept issued by the commissioner;</p> <p>(c) information as to each anticipated source of revenue of the elected local policing body (other than, in the case of a police and crime commissioner, the precept);</p> <p>(d) information as to the proposed expenditure of the elected local policing body;</p>	<p>Included in annual report and plan but not signposted</p>

REQUIREMENTS	COMPLIANCE
<p>(e) a copy of the annual investment strategy of the elected local policing body;</p> <p>(f) information as to each crime and disorder reduction grant made by the elected local policing body, including the conditions (if any) attached to the grant, the recipient of the grant, the purpose of the grant and the reasons why the body considered that the grant would secure, or contribute to securing, crime and disorder reduction in the body's area;</p> <p>(g) information as to each item of expenditure of the elected local policing body exceeding £500 (other than a crime and disorder reduction grant), including the recipient of the funds, the purpose of the expenditure and the reasons why the body considered that good value for money would be obtained.</p>	
<p>4. In relation to the property, rights and liabilities of the elected local policing body—</p> <p>(a) the identity of any premises or land owned by, or occupied for the purposes of, the elected local policing body;</p> <p>(b) a copy of each contract with a value exceeding £500 to which the elected local policing body is or is to be a party;</p> <p>(c) a copy of each invitation to tender issued by the elected local policing body in relation to a contract which the body expects will have a value exceeding £500.</p>	<p>Not relevant as PA not a legal entity? What is published at a Corporation level?</p> <p>Probably – at a CoL level – City Fund will have value of assets and lease payments</p> <p>B and C – Aga Watt (procurement)</p>
<p>5. In relation to the decisions of the elected local policing body—</p> <p>(a) the date, time and place of each public meeting to be held by the elected local policing body;</p> <p>(b) a copy of the agenda for each public meeting held by the elected local policing body, and any report or other document that is the subject matter of an item on the agenda;</p> <p>(c) a copy of the minutes of each public meeting held by the elected local policing body, and of each meeting which is not a public meeting but at which matters of significant public interest arising from the exercise of the body's functions are discussed.</p>	Compliant

REQUIREMENTS	COMPLIANCE
(d) a record of each decision of significant public interest arising from the exercise of the elected local policing body's functions, whether made by the body at or as a result of a meeting or otherwise.	
<p>6. In relation to the policies of the elected local policing body—</p> <p>(a) a statement of the policy of the elected local policing body in relation to the conduct of relevant office holders, including procedures for the handling of qualifying complaints and conduct matters (within the meaning of section 31 of the 2011 Act);</p> <p>(b) a statement of the policy of the elected local policing body in relation to the making of decisions of significant public interest arising from the exercise of the body's functions;</p> <p>(c) a statement of the policy of the elected local policing body in relation to records management, including procedures for the security and sharing of information and the retention and destruction of documents;</p> <p>(d) a statement of the policy of the elected local policing body in relation to the handling of qualifying disclosures (within the meaning of section 43B of the Employment Rights Act 1996⁽²⁾).</p>	
<p>7. In relation to the prevention of crime and disorder, a copy of any report required by the elected local policing body from the responsible authorities for a local government area under section 7(1) of the Crime and Disorder Act 1998⁽³⁾.</p>	Not applicable as report not historically required. Future reports should be published.
<p>8. In relation to the independent custody visitors appointed under arrangements made by the elected local policing body under section 51 of the Police Reform Act 2002, the identity of each person appointed.</p>	<p>Not compliant. 2018/19 ICV annual report out of date.</p> <p>Independent Custody Visiting - City of London</p>

REQUIREMENTS	COMPLIANCE
2021 Amended Order	
<p>National performance measures</p> <p>The intention of these Measures is to complement existing local priorities set out in PCCs' local Police and Crime Plans. Each force has a key role in supporting the Measures, so that collectively we can see real improvements in outcomes over the four years from the baseline of June 2019. It is recognised that not all Measures will apply equally to every force so PCCs must consider how best to apply these measures in their force area.</p> <p>The Order requires PCCs to provide a statement on the contribution of their force to achieving improvements against those priorities. We recommend that this statement includes:</p> <ul style="list-style-type: none"> • reflections on force performance and how the force has contributed towards the delivery of the national measures, including contextual information that might help explain that contribution • a summary of planned action for the next quarter to drive the force's performance against applicable measures • an explanation of which of the Measures are assessed to be applicable and which are not applicable in the local context, including the reasons for that assessment <p>The Order requires that this statement is published at the same time as the Policing and Crime Plan, and that it is reviewed quarterly, and any variation published, within one month following publication of an annual report on the force by HMICFRS.</p>	<p>Out of date. Consider linking to SPPC papers. HMICFRS inspections and performance reporting - City of London</p>
<p>HMICFRS</p> <p>The Order requires that PCCs publish the PEEL report for their force on their website, within one calendar month of its publication by HMICFRS. This may be done by publishing a link. Once HMICFRS publishes its new 2021-23 PEEL report for individual forces, PCCs are to provide a link to this report, within one calendar month.</p>	<p>Link to HMIC website.</p> <p>Infographic not published.</p>

REQUIREMENTS	COMPLIANCE
<p>Under its new PEEL assessment framework HMICFRS will grade each aspect of a force's performance as: inadequate; requires improvement; adequate; good; or outstanding. Alongside a detailed narrative to substantiate its grading decisions, HMICFRS will also include a summary infographic of its assessment of the force's performance against each inspection area.</p> <p>The Order requires PCCs to publish the summary infographic on their website within one calendar month of publication of the HMICFRS PEEL report. Individual force-level infographics will be provided to PCCs by HMICFRS on request</p>	<p>HMICFRS inspections and performance reporting - City of London</p>
<p>Complaints handling</p> <p>The Order provides that PCCs must publish the most recent IOPC quarterly complaints data for their force and the IOPC annual statistics report, alongside a narrative setting out how the PCC is holding the chief officer to account, and the PCC's assessment of their own performance in carrying out their other complaints handling functions.</p> <p>The Order requires that the IOPC data and report are to be published on the PCC's website within one month of their publication by the IOPC, and the narrative and assessment are to be published annually, within one month of the date of publication of the IOPC's annual statistics report.</p> <p>Holding the chief officer to account</p> <p>It is recommended that the narrative should include:</p> <ul style="list-style-type: none"> • how the force is measuring complainant satisfaction • progress updates on implementing relevant recommendations made by the IOPC and/or HMICFRS in relation to complaints handling, or where recommendations were not accepted an explanation as to why • a summary of any mechanisms put in place to identify and act on themes or trends in complaints 	<p>Not compliant.</p> <p>Police Authority complaints and reviews (appeals) - City of London</p>

REQUIREMENTS	COMPLIANCE
<ul style="list-style-type: none"> • a summary of systems in place to monitor and improve performance in the timeliness of complaints handling • the number of written communications issued by the force under regulation 13 of the Police (Complaints and Misconduct) Regulations 2020 where an investigation has not been completed within a “relevant period” • quality assurance mechanisms in place to monitor and improve the quality of its responses to complaints • details of the administrative arrangements the PCC has put in place to hold the chief constable to account for complaints handling e.g. frequency of meetings and a summary of discussions 	
<p>PCC assessment of their own performance in carrying out their other complaints handling functions</p> <p>It is recommended that the assessment should include:</p> <ul style="list-style-type: none"> • the timeliness of complaint reviews e.g. the average time taken to complete reviews • details of which review functions the PCC has delegated and what measures they have taken to ensure quality, integrity and impartiality • quality assurance mechanisms the PCC has established to ensure that review decisions are sound and in line with the requirements of the complaints legislation and IOPC statutory guidance • how the PCC assesses complainant satisfaction with the way in which they have dealt with complaints 	<p>Not compliant</p> <p>Police Authority complaints and reviews (appeals) - City of London</p>

Manner of publication

The amending Order specifies that the new information must be published in a prominent place on the PCC's website. The purpose of this requirement is to make it as easy as possible for the public to access the information. We fully recognise that PCC websites will differ in style and content but recommend that PCCs either:

- provide all specified information directly on the PCC's homepage; or
- clearly signpost this information on the homepage, with links to the relevant location

Appendix 3: Police Authority Governance (under review)

Committee	May	Jun	Jul	Sep	Nov	Jan	Feb	Mar
Police Authority Board <i>Quarterly reports</i> <i>Other</i>	<ul style="list-style-type: none"> Q4 E&I Update Q4 Risk Register Update Q4 Comm engagement update 			<ul style="list-style-type: none"> Q1 E&I Update Q1 Risk Register Update Q1 Comm engagement update Q1 Cap and Rev Budget Monitoring 	<ul style="list-style-type: none"> Q2 E&I Update Q2 Risk Register Update Q2 Comm engagement update Q2 Cap and Rev Budget Monitoring 		<ul style="list-style-type: none"> Q3 E&I Update Q3 Risk Register Update Q3 Comm engagement update Q3 Cap and Rev Budget Monitoring 	
	<ul style="list-style-type: none"> Provisional Cap and Rev Budget Outturn (for info) Draft CoLP Annual Report (for info/comment) Strategic Comms & Engagement Annual Plan Appointment of PAB's Committees, Chairs and appointments Court order 	<ul style="list-style-type: none"> MTFP Final CoLP Annual report (for decision) Update on Cap and Rev Budget Outturn (For info) Police Pensions Board Annual Report 	<ul style="list-style-type: none"> Final Annual Cap and Rev Budget out turn (for info) H&S Annual Performance update Modern Slavery Annual Update 		<ul style="list-style-type: none"> MTFP Annual Review of Fees and Charges- For decision ICV annual report PA Annual Review 	<ul style="list-style-type: none"> Draft/ Provisional Budget (for info) Ethical partnerships annual report Draft Policing Plan refresh (for info) Complaints / IOPC annual report Police Authority Business Plan 	<ul style="list-style-type: none"> Final Cap and Rev Annual budget setting (For decision) Policing Plan refresh (for decision) 	<ul style="list-style-type: none"> Terms of reference review
Strategic Planning & Performance	<ul style="list-style-type: none"> Q4 Performance-v Policing Plan Measures Q4 Community Engagement Update Q4 HMICFRS Update Deep dive: Protective security / Secure City Terms of reference 			<ul style="list-style-type: none"> Q1 Performance-v Policing Plan Measures Q1 Community Engagement Update Q1 HMICFRS Update Deep dive: Victims Safer City Partnership Annual Report 	<ul style="list-style-type: none"> Q2 Performance-v Policing Plan Measures Q2 Community Engagement Update Q2 HMICFRS Update Deep Dive: Safeguarding and vulnerability 		<ul style="list-style-type: none"> Q3 Performance-v Policing Plan Measures Q3 Community Engagement Update Q3 HMICFRS Update Policing Plan Measures refresh for following year Deep Dive: [ASB / NTE?] 	
Resource, Risk & Estates	<ul style="list-style-type: none"> Provisional Cap and Rev Budget Outturn Q4 Workforce Update Q4 Risk Register Update MTFP Information Security Annual Report Terms of reference 			<ul style="list-style-type: none"> Q1 Cap and Rev Budget Monitoring Q1 Workforce Update Q1 Risk Register Update 	<ul style="list-style-type: none"> Q2 Cap and Rev Budget Monitoring Q2 Workforce Update Q2 Risk Register Update MTFP Annual Review of Fees and charges 		<ul style="list-style-type: none"> Q3 Cap and Rev Budget Monitoring Q3 Workforce Update Q3 Risk Register Update Annual Cap and Rev Budget Setting 	
Professional Standards & Integrity	<ul style="list-style-type: none"> Q4 E&I Update Q4 CoLP Complaints Data Q4 AF Complaints Data Q4 Stop and Search and Use of Force Terms of reference 			<ul style="list-style-type: none"> Q1 E&I Update Q1 CoLP Complaints Data Q1 AF Complaints Data Q1 Stop and Search and Use of Force 	<ul style="list-style-type: none"> Q2 E&I Update Q2 CoLP Complaints Data Q2 AF Complaints Data Q2 Stop and Search and Use of Force 		<ul style="list-style-type: none"> Q3 E&I Update Q3 CoLP Complaints Data Q3 AF Complaints Data Q3 Stop and Search and Use of Force 	
Economic and cyber crime	<ul style="list-style-type: none"> Q4 NLF Performance Q4 Cyber Griffin Q4 Cyber Portfolio update Strategic Comms & Engagement Update NLF / Cyber Annual Plan Refresh Terms of reference 			<ul style="list-style-type: none"> Q1 NLF Performance Q1 Cyber Griffin Q1 Cyber Portfolio Update Strategic Comms & Engagement Update 	<ul style="list-style-type: none"> Q2 NLF Performance Q2 Cyber Griffin Q2 Cyber Portfolio Update Strategic Comms & Engagement Update 		<ul style="list-style-type: none"> Q3 NLF Performance Q3 Cyber Griffin Q3 Cyber Portfolio Update Strategic Comms & Engagement Update 	

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