



City of London Police Authority Board

Date: WEDNESDAY, 22 NOVEMBER 2023
Time: 11.00 am
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members:

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

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Ian Thomas CBE
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 the public minutes and non-public summary of the meeting held on 25th October 2023.

For Decision
(Pages 7 - 14)

4. **OUTSTANDING REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Discussion
(Pages 15 - 18)

5. **MINUTES FROM RECENT COMMITTEE MEETINGS**

NB. There are no draft minutes since the last meeting of the Board.

6. **CHAIR'S PUBLIC UPDATE**

The Chair to be heard.

For Discussion
(Pages 19 - 22)

7. **COMMISSIONER'S UPDATE**

Commissioner & Chief Officers to be heard.

For Discussion
(Pages 23 - 26)

8. **NATIONAL LEAD FORCE**

Commissioner & Chief Officers to be heard.

For Discussion

9. **INDEPENDENT ADVISORY & SCRUTINY- UPDATE ON NEW ARRANGEMENTS**

Report of the Commissioner.

For Discussion
(Pages 27 - 36)

10. **NOTIFIABLE ASSOCIATIONS UPDATE**

Report of the Commissioner.

For Discussion
(Pages 37 - 44)

11. **QUARTERLY EQUALITY AND INCLUSION UPDATE**

Report of the Commissioner.

For Discussion
(Pages 45 - 54)

12. **QUARTERLY COMMUNITY ENGAGEMENT UPDATE**

Report of the Commissioner.

For Discussion
(Pages 55 - 58)

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

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

15. **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

16. **NON-PUBLIC MINUTES**

To approve the non-public minutes of the meeting held on 25th October 2023.

For Decision
(Pages 59 - 60)

17. **NON-PUBLIC OUTSTANDING REFERENCES**

Joint Report of the Town Clerk and Commissioner.

For Discussion
(Pages 61 - 62)

18. **NON-PUBLIC MINUTES FROM RECENT COMMITTEE MEETINGS**

NB. There are no draft non-public minutes since the last meeting of the Board.

19. **CHAIR'S NON-PUBLIC UPDATE**
The Chair to be heard.
For Discussion
20. **COMMISSIONER'S UPDATE**
The Commissioner & Chief Officers to be heard.
For Discussion
21. **FRAUD AND CYBER CRIME REPORTING ANALYSIS SYSTEM (FCCRAS)**
Standing update on Action Fraud replacement.
For Discussion
22. **NATIONAL LEAD FORCE**
Commissioner & Chief Officers to be heard.
For Discussion
23. **NATIONAL POLICING STRATEGY FOR FRAUD, ECONOMIC AND CYBER CRIME 2023-2028**
Report of the Commissioner.
For Discussion
(Pages 63 - 166)
24. **STRATEGIC COMMUNICATIONS AND ENGAGEMENT PLAN FOR ECONOMIC AND CYBER CRIME**
Report of the Town Clerk and Commissioner.
For Discussion
(Pages 167 - 194)
25. **GUILDHALL YARD EAST DECANT**
Report of the City Surveyor.
For Decision
(Pages 195 - 202)
26. **SALISBURY SQUARE DEVELOPMENT**
Report of the City Surveyor.
For Decision
(Pages 203 - 214)
27. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**
28. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE BOARD AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

CITY OF LONDON POLICE AUTHORITY BOARD
Wednesday, 25 October 2023

Minutes of the meeting held at Guildhall at 11.00 am

Present

Members:

Deputy James Thomson (Chair)
Tijs Broeke (Deputy Chair)
Alderman Professor Emma Edhem
Helen Fentimen
Graham Packham
Deborah Oliver
Dawn Wright
Melissa Collett (External Member)
Sir Craig Mackey (External Member)

Officers:

Ian Thomas	-	Town Clerk
Polly Dunn	-	Town Clerk's Department
Caroline Al-Beyerty	-	Chamberlain
Richard Riley	-	Director of the City of London Police Authority
Katie Foster	-	Remembrancer's Department
Aga Watt	-	Chief Operating Officer's Department
Frank Marchione	-	Comptroller & City Solicitor's Department
Ola Obadara	-	City Surveyor's Department

City of London Police:

Peter O'Doherty	-	T/ Commissioner
Paul Betts	-	Assistant Commissioner
Umer Khan	-	City of London Police
Alix Newbold	-	City of London Police
Chris Bell	-	City of London Police
Martin O'Regan	-	City of London Police
Kate MacLeod	-	City of London Police
	-	
Hayley Williams	-	City of London Police
Rachel Waldron	-	City of London Police

1. APOLOGIES

Apologies were received from Jason Groves*, Munsur Ali*, Nicholas Bensted Smith, Alderman Tim Hailes, Andrew Lentin and Michael Mitchell.

**joined remotely*

The Chair thanked Baroness Louise Casey for providing Members with an informal briefing, ahead of this meeting of the Board, on her review of the Metropolitan Police Service and the learnings for the City of London Police (CoLP). Members noted that Sarah Lawson from the Serious Fraud Office and Baroness Casey would be observing this meeting.

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

Tijs Broeke (Deputy Chair) advised of his recent appointment to the London Policing Board, which had been recorded on his Register of Interests as a standing declaration.

3. **MINUTES**

RESOLVED, that - the minutes of the meeting held on 20th September 2023 be approved, subject to a point of accuracy under the Commissioner's update in respect of shoplifting cases not being investigated; resulting in under-reporting. The Chair agreed to this amendment, also noting the inaccurate data which had been reported about shoplifting in the City of London in a recent publication.

4. **OUTSTANDING REFERENCES**

The Board received a report of the Town Clerk, which set out Outstanding References from previous meetings of the Committee and noted the following:

1. The Police Authority Board Director reported a 3% increase in crime on the Barbican Estate over the past 5 years and a decrease in anti-social behaviour; suggesting that CCTV might not be necessary at this time. However, Members would receive a full report at the December Board meeting.
2. A Member asked for the list to be populated with dates, noting there might be exceptions where these are led by Government; i.e. Martyn's Law.
3. Noting it had previously been agreed to be reported by March 2024, the Chair asked for the post implementation Review of the Special Constabulary to be brought forward to the December Board meeting.
4. A report on Parkguard and CSAS powers would be presented to the December Board, together with the review of relevant Bylaws, and a further item on the non-public outstanding actions list.

RESOLVED, that – the report be noted.

5. **MINUTES FROM RECENT COMMITTEES**

The Board received the draft minutes from the following meetings:

1a. **Strategic Planning and Performance - 5th September 2023**

The Strategic Planning and Performance Committee (SPPC) Chair advised that the last meeting had discussed the renewal of the Parkguard Contract and Byelaws.

The Committee also considered the Victim Strategy, with the emphasis on there being no slippage, together with Neighbourhood Policing, which appears next on this Board agenda, and a deep dive into the recent inspection reports.

2a. Resource Risk and Estates - 6th September 2023

Matters arising from this Committee would be covered in the non-public report on this agenda.

3a. Economic and Cyber Crime - 8th September 2023

Received.

4a. Professional Standards and Integrity Committee - 15th September 2023

Received.

6. APPOINTMENT TO THE PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE

The Chair was pleased to advise of three expressions of interest from very high calibre candidates. As there was just one vacancy, the Chair suggested that the Terms of Reference be temporarily amended, until the end of this Civic Year, to accommodate 2 Members. At this point, the Membership could be revisited with a view to making a permanent increase. A ballot was held, whereby Joanna Abeyie received 7 votes, Naresh Sonpar received 6 votes and Alderman Kawsar Zaman received 3 votes.

RESOLVED, that:

1. The Membership of the PSI Committee be increased by (1) until the end of the Municipal Year.
2. Joanne Abeyie and Naresh Sonpar be appointed to the PSI Committee for the remainder of 2023/24

7. CHAIR'S PUBLIC UPDATE

The Board received the Chair's update, noting particularly the conflict in the Middle East, the Economic Crime briefing on 19 October and the importance of the contribution of local forces and PCCs in tackling fraud, wider economic crime and cyber-crime and the publication of the National Policing Strategy for tackling these threats.

The Chair further advised that he would be speaking to the Home Secretary on Thursday 26 October to discuss prioritisation of fraud; legislation and policy improvements and funding for CoLP (including National Lead Force funding).

RESOLVED, that – the report be noted.

8. COMMISSIONER'S UPDATE

The Board received the Commissioner's update and the Town Clerk commended the City of London Police for their decisive action in respect of policing in London in relation to the Middle Eastern conflict.

The Director of the Police Authority Team set out the wider activities of the security and resilience teams and the next steps in respect of community/business meetings; utilising channels such as the 'City Belonging' project. The City of London Police had reached out to the relevant staff associations to offer support in respect of the impact of the conflict.

The Police's impartiality in this matter was noted and they had been working with the CPS to ensure clear guidance to officers. An operational Memorandum of Understanding was in place with the Met and BTP. Additionally, a Member briefing on Policing and Public Order had been scheduled for 31st October. Members noted the strong messaging around zero tolerance via social media, engagement sessions and cluster meetings. The Commissioner stressed that all calls to CoLP relating to the impact of the conflict will be scrutinised and immediate action taken.

During the discussion and questions on other matters, the following points were noted:

1. Members are very supportive of the Cycle Squad and the evidence base from the 12-week trial would be presented to the next meeting of the Board, noting the likely intention of the City Police to make it permanent.
2. The Commissioner agreed to add data to the 'Walk and Talk' initiative in terms of its impact on behaviours. The Commissioner advised that the application for 'White Ribbon' accreditation had been submitted. The Chair asked for an update at the November Board.
3. There had been some very good, quantified improvements in respect of the Lead Force Contact Centre, with more call handlers than previously. Whilst there is a strong communications and engagement strategy in place, the Commissioner accepted that it could be more pro-active. However, many countries across the world hold the service in very high regard.
4. There are 240 trained cypto-currency advisors, who are producing guidance to businesses and prevention messaging, noting its significance in money laundering.
5. As Members cannot use the Electoral Register to engage with the community would they be able to use Heart of the City?
6. BBC action week for fraud was running between 23rd and 27th October, with a number of City of London Police appearances scheduled across tv and radio.

RESOLVED, that – the report be noted.

9. EDUCATIONAL CAMPAIGN TACKLING VIOLENCE AGAINST WOMEN AND GIRLS

The Board received a report of the Executive Director, Community and Children's Services seeking support to launch a Violence Against Women and Girls Educational campaign, developed by the City of London Corporation Community Safety Team, alongside London Borough of Hackney and London Borough of Tower Hamlets.

During the discussion, the following points were noted:

1. Members asked if the use of the acronym 'VAWG' could cease.
2. Officers are working with the City of London Corporation Licensing Team in respect of the messaging around transport hubs in the run up to Christmas.
3. The Act itself lacks definition as to what might constitute a breach and officers agreed to work with Remembrancers and the City Surveyor in terms of making the parameters more defined.

RESOLVED, that – the Campaign be commissioned

10. NATIONAL BUSINESS CRIME PORTFOLIO- NATIONAL BUSINESS CRIME CENTRE (NBCC)

The Board received a report of the Commissioner which provided an update of the work of the NBCC since its last paper in June 2023.

During the discussion, the following points were noted:

1. The Team was congratulated on this work, noting the extensive reach into the business community.
2. As safe retail spaces are fairly small in the City, it would be helpful to have a practical example as to what they might look like. The Chair also asked for an update, which would be brought in the next report setting out how this might align with safe spaces for Violence Against Women and Girls and protecting vulnerable people.
3. The Home Office Transformation fund had now depleted.

RESOLVED, that – the report be noted.

11. NEIGHBOURHOOD POLICING STRATEGY

The Board received a report of the Commissioner in respect of the HMICFRS PEEL Inspection recommendation in that the City of London Police should develop a strategy for providing neighbourhood policing.

During the discussion, the following points were noted:

1. The process for scrutiny of the performance framework and delivery plan/referral to the Board had been discussed at length at the recent SPPC.
2. The Chair supported the suggestion, from the Deputy Chair, that this should be presented to each meeting of the SPPC.
3. The Cluster Meetings are generally well attended by businesses but not residents, despite extensive advertising and newsletters. It was suggested that they are held at a different time of the day. The Chair asked for a report from the City Police and Police Authority Team in respect of re-invigorating the cluster meetings and the communications supporting them.
4. There had been some turnover of Ward Officers but recruitment was stabilising, with robust reward and retention packages for neighbourhood policing. Whilst Community policing offers a good evidence base for promotion, the roles could be profiled better in terms of their core values.
5. The Town Clerk agreed to work with the Executive Director of Community and Children's Services and the Public Health Team in respect of an early intervention offer and how this might be integrated across the Partnership. Members noted the work underway within the Safer City Partnership, with the various delivery groups looking at common themes.

RESOLVED, that – the report be noted.

12. **INDEPENDENT CUSTODY VISITING SCHEME ANNUAL REPORT**

The Board received a report of the Town Clerk which provided an update on 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.

The Chair thanked the ICV Panel and lead Member, Deborah Oliver, noting how they continued working throughout the pandemic, when a lot of groups across the UK ceased. The Commissioner asked to meet with the team and the Scheme Manager was commended for her excellent work across a wide remit.

During the discussion, the following points were noted:

1. The group had recently reduced from 9 to 7 and the Lead Member asked for support with the recruitment process and speed of vetting.
2. Feedback on issues and recommendations raised are currently picked up by a dedicated Working Group, chaired by the Superintendent. The PA Director agreed to bring a report to a future meeting on the Governance of the Group.
3. A date would be set for Members to visit the new custody facility when it was built.

4. The 'City Hope' Conference on 26 October in respect of Suicide Prevention was welcomed. However, there are separate conversations underway about mental health across Community and Children's Services, the Health and Wellbeing Board and the Integrated Commissioning Board, which could be more joined up.
5. There is also a Mental Health Working Group looking at prevention at a national level, with NHS partners. The Town Clerk had attended the City Healthwatch AGM and recommended it as a strong link into this work, from the patient's perspective.
6. The work with the Integrated Commissioning Board (ICB) is being led by the Executive Director, Community and Children's Services. The last meeting of the ICB discussed the amount of Police hours spent in A&E departments when there are no NHS Mental Health Practitioners available.

At 12.55 the Board agreed to extend the meeting to conclude the business on the agenda.

RESOLVED, that – the report be noted.

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

There were no questions.

14. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT

There were no items of urgent business.

15. 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
16 -22	3, 7

16. NON-PUBLIC MINUTES

RESOLVED, that – the non-public minutes of the meeting held on 20th September 2023 be approved

17. NON-PUBLIC OUTSTANDING REFERENCES

Members received the non-public outstanding actions list.

18. NON-PUBLIC MINUTES FROM RECENT COMMITTEES

Received.

- 1a. Strategic Planning and Performance - 5th September 2023
- 2a. Resource Risk and Estates - 6th September 2023
- 3a. Economic and Cyber Crime - 8th September 2023

4a. Professional Standards and Integrity Committee - 15th September 2023

19. **MIDDLESEX STREET, CAR PARK, MIDDLESEX STREET, E1 7AD**

The Board received a report of the City Surveyor

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

There were no questions.

21. **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.

22. **MINUTES**

RESOLVED, that – the Confidential minutes of the meeting held on 20th September 2023 be approved.

The meeting ended at 1.10 pm

Chairman

Contact Officer: julie.mayer@cityoflondon.gov.uk

City of London Police Authority Board – Public Outstanding References

2/2023/P	Item 4 Outstanding References	The Chair of PAB asked for clarity on the process to be followed for reviewing whether an extension of CCTV on the Barbican residential estate was appropriate.	Director of the Police Authority	In Progress- Report due at December PAB.
4/2023/P	Item 16 Protect Duty (Martyn's Law) Update	It was confirmed that a once full details of the Force and Corporation's responsibilities under Protect Duty were confirmed a detailed plan would be provided on how best to resource and delivery these responsibilities.	Commissioner/ Director of Police Authority	In Progress- At 24 th May PAB the PA Director assured the Board that preparatory work is in progress and an update will follow later in the year. On Tuesday 2 May 2023, the Government published the draft Terrorism (Protection of Premises) Bill , also known as Martyn's Law, for pre-legislative scrutiny by the Home Affairs Select Committee.
6/2023/P	Item 10 Independent Advisory Scrutiny Group- Review of Arrangements	Chair of PAB asked to have an update back later in the year (November/December) to see what has worked and what has not worked, with the new arrangements with IASG and Professionalism and Trust	Commissioner	Complete- report is on the agenda..
7/2023/P	Item 10 Vision Zero Plan 2023 – 2028	Following the Board's discussion on the importance of education on traffic regulation the Chair requested that Officers complete the review of relevant byelaws and how they were enforced in practice.	Police Authority/ Comptroller and City Solicitor	In Progress- Report due at December PAB.

8/2023/P	Item 7 Commissioner's Update	The Chair requested that once the Force had conducted any post implementation review of the special constabulary in the autumn, an update be provided to a future meeting of the Board to assess the impact of the reorganisation.	Commissioner	In Progress- At September PAB it was agreed that this review would be brought back to PAB no later than March 2024. However, at the October PAB, the Chair requested an update be brought back before Christmas. Due at December PAB.
10/2023/P	Item 8 Public Order Act	The Deputy Chair requested that the Force update on the impact of the Public Order Act in the autumn	Commissioner/ Remembrancer	Complete- A Member Briefing session was delivered on Public Order Policing on 31 st October with approximately 24 members joining the briefing.-
11/2023/P	20 September- Item 8 Community safety patrolling and delegation of CSAS powers	The Police Authority Director and Executive Director of Community & Children's Services agreed to address issues raised by some Members regarding the Parkguard contract and clarity on powers in a re-draft of the report.	Police Authority Director and Executive Director of Community & Children's Services	In Progress- Report due at December PAB.
12/2023/P	25 October: Item 8- Commissioner's Update	Cycle Squad and the evidence base from the 12-week trial would be presented to the next meeting of the Board.	Commissioner	In progress- this is still a work in progress and the evaluation is yet to be presented to the CoLP Chief Officer Team. A verbal update will be provided on timelines.
13/2023/P	25 October- Item 8- Commissioner's update	Commissioner agreed to add data to the 'Walk and Talk' initiative in terms of its impact on behaviours. The Commissioner advised that the application for 'White Ribbon' accreditation	Commissioner	Complete- An update on the Walk and Talk initiative was provided to the PSIC on the 7 th November- the Lady Mayoress has been invited to attend further pop up events to encourage

		would be submitted by 25th November and the Chair asked for an update at the November Board		increased take up of Walk and Talk. White Ribbon Accreditation has been achieved by CoLP and CoLP Chief Officers are signed up as ambassadors. 25 th November will be the start of a month of related activity.
14/2023/P	25 October - Item 11 NHP Strategy	The Chair asked for a report in respect of re-invigorating the cluster meetings and the communications supporting them.	PA Director/ Commissioner	In Progress- This has been tasked out to Local Policing and the CoLP COO has liaised with PA Director. Due at February PAB.

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Committee(s): Police Authority Board	Dated: November 2023
Subject: Chair's Update	Public
Report of: James Thomson	For Discussion

Lord Mayor's Show/Remembrance Sunday

I was hugely proud, and grateful for, the impressive and professional way in which the City of London Police supported the 695th Lord Mayor's Show on Saturday 11 November, and the Remembrance Service at St Paul's the following day. I had the opportunity to attend a number of briefings – both local and national – in the run up and during the event. My sincere thanks go to all uniformed officers on duty on the City's streets that weekend. My thank also to the many other City Police officers, police staff and Corporation officers who worked hard before and during the events to ensure that the public and participants were safe. These events take months of planning and something like the Lord Mayor's Show starts with the debriefing of the one before. The planning and policing was clearly made more complicated by the dynamic national and London picture. My thanks also to Specials from both the City Police and Met Police who were also on duty and other police services providing mutual aid including West Midlands.

Middle East

I continue to be saddened by the tragic events in the Middle East. I have been in close touch with the City Police leadership about the approach being taken in the City to engaging with and reassuring communities, and the support being given to colleagues in the Met Police, as required. The leadership has my full support. It is vitally important at this time that all in leadership roles in relation to policing – chief constables and commissioners, local policing bodies, and the Home Secretary – respect and adhere to the contents of the Policing Protocol which sets out how the functions of each should be exercised in relation to each other.

I have recently chaired separate online conversations with City workers, and members of the Jewish and Muslim communities in the City. They have been organised through the Corporation's excellent "City Belonging" network initiated earlier this year. They have provided opportunities for the City Police to amplify their reassurance messaging. And all have proved insightful, including as a reminder that our communities need both to be safe and *feel* safe and the importance of creating safe spaces for conversations to be enabled within organisations.

Economic Crime

I was pleased to see Royal Assent for the Online Safety Act and Economic Crime and Corporate Transparency Act. These bring in some significant changes to the legislative duties on businesses, not least with making fraud a priority harm that large social media companies will be required to address on their platforms. Additionally, while the failure to prevent fraud offence is a small step in the right direction, it is important that we develop further proposals, with Government, to make the

responsibility of protecting the public from fraud sit more broadly across the business community.

Stakeholder Engagement

Our planned political engagement continues, promoting the benefits of the City of London Police as National Lead Force and the importance of the wider policing response that has to be a part of any new system that a future government of any political persuasion might be considering. The City of London Police and the Authority recently hosted two Labour candidates for Parliament (Rachel Blake – City and Westminster; and Joe Powell – Kensington and Bayswater) as it's important to illustrate the role of the City Police in tackling economic and cyber crime, and also keeping those that live, work and visit the City safe from harm. This was also a useful opportunity to describe the wider supporting role the City Corporation has in support these aims, as security is the critical foundation of prosperity.

The Authority and City Police will also be attending a Labour Policy Roundtable, organised by Lloyd's Banking Group, discussing the requirements for an effective system to tackle fraud.

The funding of national roles is key part of this for the City of London.

At the time of writing, we have just seen the change in Home Secretary from Suella Braverman to James Cleverley.

I remain very focussed on the Police Authority supporting the City Police with building momentum behind its Strategic Communications and Engagement Plan and we are looking at how we might support the resourcing of this to build momentum in the short term.

Safety in the City

Two recent initiatives to highlight:

- **Taxi Marshalling launch** – On Thursday 2nd November a taxi marshalling scheme was launched outside Liverpool Street station, funded by the City's Safer City Partnership, and supported by the City's Crime Prevention Association. It will run on Thursday, Friday, and Saturday nights from 10pm to 1am, offering a safe way to get home. I very much look forward to seeing the evaluation of this scheme.
- **Safer Streets Fund grant award** – The City will receive £300,000 as part of a successful multi-borough bid to the Home Office's Safer Streets Fund. The initiative aims to reduce crime and disorder on central London bridges, funding a cross-borough problem-solving team supported by an analyst and business engagement officer from the Safer Business Network, a new data-sharing agreement, and in the City a contribution to new CCTV installations and an expansion of the Parkguard community patrol service. My thanks go to the Corporation officers involved in securing this additional funding for the City.

Baroness Casey visit

The visit by Baroness Casey has had much positive feedback and provided opportunities to reflect on learnings for the City Police and the Authority as we progress towards making the City Police the most inclusive police service in the Country.

City Hope Conference

The City Corporation hosted the City Hope suicide prevention conference on 26 October. The conference involved a range of insightful talks, workshops and panels that provided a strong overview of how we deal with the challenging nature of suicide intervention in the City. I commend the Corporation report published to accompany the event - "Suicide Prevention Measures in the City of London".

Sadly, the Square Mile has locations of significance that draw those who are contemplating taking their own lives. The report published last month sets out how we can work better with our partners inside and outside our City boundaries. We have a dynamic population with a diverse range of needs. As with many other areas, partnership working is key to the prevention of suicide.

I was honoured to close the conference, where I spoke of my own experience as a special constable attending calls on our City bridges, reinforced how partnership is key to addressing suicide in the City, and above all else, how we must retain hope in the midst of what are challenging, and sometimes daunting circumstances.

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Agenda Item 7

Committee(s): Police Authority Board	Dated: 22 November 2023
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 132-23	For Discussion
Report author: Pete O'Doherty, T/Commissioner of Police	

Summary

At the April 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.

Baroness Casey visit

Baroness Casey's recent visit to the City of London Police was marked by our dedication to maintaining a culture of transparency, accountability, and integrity. Her engagement with the force underscored our unwavering commitment to upholding the highest professional standards in policing. The meeting focused on emphasising the crucial role the City of London Police plays in building strong relationships and understanding the community we serve. The opportunity to listen, understand and learn from her experience will greatly allow City of London police to continue building trust and confidence within our communities.

White Ribbon Accreditation

The City of London Police is proud to be accredited by White Ribbon, a significant initiative in the global movement to end violence against women. This accreditation reflects the force's commitment to raising awareness and taking action against domestic violence and abuse. As part of this pledge, 2 champions and 6 ambassadors have been selected to engage the workforce in a commitment to prevent men's violence against women and girls, and work towards transformational change in organisational culture, systems, and in our communities. City of London Police demonstrates its dedication to fostering a safe and respectful community for all, while encouraging individuals to stand up against gender-based violence.

Safer Business Action Week

This annual event brought together businesses, law enforcement, and local communities to address safety concerns, enhance security measures and promote a sense of unity. Through collaborative initiatives, businesses and individuals gained valuable insights into crime prevention and an increased sense of security in the heart of London's financial district. Successes included proactive policing patrols, arresting a number of shoplifters and targeted activity to those who cause significant harm to local businesses including a group who targeted Co-Op stealing bottles of alcohol, initially running from police but closely followed and detained by the Proactive Acquisitive Crime Team.

Op Reframe

Another successful night protecting those enjoying the nighttime economy with CoLP officers engaging with numerous people who appeared to be vulnerable with the majority through excess alcohol. A number of license premises successfully passing the 'Ask Angela' test with a few requiring further training. Further Op Reframe is scheduled for December to support the Christmas campaign.

Criminal Damage to Places of Worship and Livery Halls.

Following a number of windows damaged across Places of Worship and Livery Halls, officers trawled through extensive CCTV, identifying a suspect. With a coordinated response from across the force, the suspect was identified and apprehended. A thorough investigation has led to the suspect being charged with offences targeting six (6) different venues.

Theft arrest

Officers on patrol came across a victim who had just had their bag snatched. The victim had been taking selfies with a friend and officers quickly established the suspect had been photographed in one of the photos inadvertently. As the victim had her bank card stolen, officers reviewed her online banking app and found a meal had just been purchased nearby. Officers immediately deployed to the restaurant and located the suspect who was swiftly apprehended. The victim focused approach to a crime in action allowed stolen property to be recovered and detain a suspect who may have gone on to commit further offences.

National Lead Force

POLICE INTELLECTUAL PROPERTY CRIME UNIT (PIPCU)

PIPCU were at the Internet Corporation for Assigned names and numbers (ICANN)¹. This is the nearest event to global internet governance and the Unit also has a seat on the high level public safety advisory panel, which allows them to have input into decisions that affect how global internet rules are set.

Insurance Fraud Enforcement Dept (IFED)

IFED has deployed on Operation Jeren, a period of intensification focussed on commercial insurance fraud. In addition to multiple warrants and other executive actions, IFED Officers joined with the City police Roads Policing Unit (Traffic Police) to process drivers and vehicles entering City to identify offences and take necessary action (vehicle seizure etc). They were supported by a cross industry intelligence cell.

National Fraud Intelligence Bureau (NFIB)

Plans are being finalised for the next National User Group (NUG) forum (30 November) that will bring together forces and regional Organised Crime Unit representatives from across the UK. The event will showcase Fraud and Cyber Crime Reporting and Analysis Service (FCCRAS) and the new National Policing Strategy for Fraud, Economic and Cyber Crime.

Action Fraud/FCCRAS

The intelligence workflows have started to be built that will underpin the new FCCRAS software platform. Work is also underway to agree the licencing system that will enable UK forces to access and update intelligence held within the new platform. This is an important milestone as it is delivering some key system building blocks that will ultimately improve the victim journey under FCCRAS.

This update relates to Media Linked to the BBC’s ‘Be Scam Safe’ week, CoLP and Action fraud have been referenced in a series of radio and TV programmes including Radio 4’s Money Box and You and Yours. Also Radio 4’s File on 4; and BBC1’s The One Show. The item about Action Fraud is due to air as part of One Show’s ‘Watchdog’ program. The item follows a number of complaints received from members of the public about the amount of time it takes to get a response after submitting their reports and the outcome of their reports.

There has been positive national and local reporting of AF’s warning about criminal gangs cloning prepayment energy meter keys, before selling them door-to-door.

The student safety campaign has generated 17.9m impressions and 6.5m reach with good support from forces and partners. The main areas of focus are password protection, money mule, phishing, investment fraud and advance fee fraud (rental and recruitment).

Dedicated Card and Payment Crime Unit (DCPCU)

A group of fraudsters have been sentenced after conspiring to access customer accounts to steal their money, leading to just over £1 million in fraudulent transactions. Organised crime group members recruited bank insiders, creating a sophisticated criminal network, using individuals pretending to be genuine customers to attend branches and then conduct withdrawals and transfer funds to bank accounts under the group’s control. The group were sentenced at Southwark Crown Court this month, receiving between 2 and 6 years in prison.

Economic Crime Academy (ECA)

Good traction remains in place with the CPS to roll out training in relation to The Fraud Investigation Model and various elements of Cyber/Crypto and Internet Investigations on a national level. The International Anti-Corruption Coordination Centre (IACCC) within The National Crime Agency (NCA), has requested that the ECA support them to undertake a Training Needs Analysis (TNA), and to provide the training of some 40 Mauritius Investigators within Bribery & Corruption. The Home Office has requested that The ECA deliver “Demystifying Cyber Crime” and “Internet Investigations” courses to the Mauritius Police.

Pete O’Doherty
T/Commissioner

¹ [Internet Corporation for Assigned Names and Numbers \(ICANN\)](#) Page 23

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Agenda Item 9

Committee(s): Professional Standards and Integrity Committee Police Authority Board	Dated: 7 November 2023 22 November 2023
Subject: Independent Advisory & Scrutiny- Update on new arrangements	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1- People are Safe and Feel Safe
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Commissioner of Police Pol 114-23	For Discussion
Report author: Sanjay Andersen, Head of Professionalism and Trust Team, City of London Police, and Independent Advisory & Scrutiny Group Executive Committee	

Summary

At the Police Authority Board in March 2023, a report was submitted on the review of arrangements for managing and facilitating the relationship between the City of London Police (CoLP) and the Independent Advisory Scrutiny Group (IASG). The Board was reassured by the changes being proposed but asked CoLP to provide an update back to the Board in the Autumn with a view to assessing what has worked and what has not worked, with the new arrangements of Professionalism and Trust managing the relationship with the IASG.

The report highlights key activity following the changes and outlines progress made by the force single point of contact or ‘SPOC’.

This is a joint report, whereby the IASG Executive has been invited to contribute their own update on progress since the transition and has been consulted on the full content of the report.

Recommendation(s)

It is recommended that Members note the report.

Main Report

Background

1. This report provides an update on the management of the relationship and arrangements between the CoLP and the IASG and is an update to the report provided to the Police Authority Board on the 22nd March 2023.
2. The Independent Advisory and Scrutiny Group (IASG) affords the City of London Police with independent advice from a group of critical friends from the City of London community, including members who are transient workers, residents, and from the business community. The Group provides feedback and challenge around stop and search, use of force, equality & inclusion, professional standards and are also invited to provide appropriate independent advice on Critical Incident Gold Groups on community issues.
3. Additionally, the IASG help to provide scrutiny of performance and service delivery, particularly following thematic reviews such as the PSD review of police perpetrated Violence against Women and Girls and Misogyny, and other reports of significance, such as the Child Q review presented at the IASG meeting on 27 September 2023 by the Director of Professional Standards.
4. In keeping with the City of London Police's new Policing Plan, which is focused on rebuilding trust, putting victims first, and creating an inclusive and supportive culture, and as a result of IASG feedback in January 2023 – responsibility for managing CoLP's relationship with the IASG was moved from the Local Policing portfolio to the Professionalism & Trust Portfolio. A Single Point of Contact 'SPOC' for the IASG was assigned from the Professionalism and Trust portfolio to facilitate better working with the group .

Professionalism & Trust Updates

5. Following the change to arrangements, regular monthly meetings take place between the Professionalism & Trust Senior Management Team and the IASG Executive Committee. These monthly meetings allow for issues and concerns to be raised and addressed outside of the quarterly IASG meetings.
6. The quarterly IASG meetings are held in person at Guildhall Yard East. In addition to representation from Local Policing and Professionalism & Trust, the quarterly meetings are now attended by a member of the Chief Officer Team. Attendance at meetings remains consistent, with the most recent meeting well attended. For a copy of the latest agenda, please refer to Appendix A.
7. Some IASG members have specific interests and small sub-groups have been formed for particular areas of policing. To support this, Professionalism & Trust remain the conduit for the relationship between the IASG and the relevant business area within CoLP. The IASG's Sub-Groups are:

- Counter-Terrorism
- Violent & Acquisitive Crime
- Fraud
- Vulnerable People
- Public Order
- Roads Policing
- Cyber Crime
- Hate Crime
- Stop & Search
- Use of Force

8. The most recent development with regard to the IASG's sub-groups is a refresh of CoLP liaison contacts for each area. These have been identified by position/ role, to ensure that when officers change roles or leave the organisation, there remains a consistent point of contact for each sub-group.

Other developments include:

9. A Ride Along was arranged for an IASG member with uniformed officers, as part of the training plan offered to the group. The feedback received was positive, and the attending IASG member recounted the experience as valuable and insightful into the role that police officers perform in the City of London.
10. Further assurance on IASG members' vetting statuses has been conducted, and further members of the group have been cleared for vetting. The IASG SPOC continues to engage with those members who are required to submit further documentation for their vetting applications to be completed. The group was reminded that they may attend Gold Groups for critical incidents to offer an independent perspective, should they elect to receive a higher level of vetting.
11. It was agreed that Local Policing and P&T leads will meet with the IASG to discuss necessary improvements to the stop search and use of force dip sampling process, to enable the IASG to more effectively scrutinise CoLP's use of police powers. Additionally, CoLP will facilitate sampling of uses of force including all taser discharges, any uses of taser involving juveniles, baton uses, and deployments of police dogs in a use of force capacity.
12. CoLP's Director of Professional Standards attended the latest IASG meeting to present an update regarding complaints and conduct statistics, juvenile strip searching following the Child Q report (all of which have been reported formally for Police Authority scrutiny to the Professional Standards and Integrity Committee (PSIC)), and P&T provided an update on Vetting Refusals i.e where potential recruits or applicants have failed vetting, for all new joiners and transferees from other police forces. An overview of *statistics* around vetting interviews for applicants to CoLP both during the vetting process and post vetting refusal, will be provided at the next IASG meeting in November, following interest in the number of candidates refused on the basis of family association and financial status.

13. The IASG also requested that Civil Claims against CoLP for police use of force to be shared with the group, to be reviewed and sampled as with other use of force incidents. CoLP agreed to consider this request but explained that there may be legal boundaries which prevent the sharing of these details. An update will be provided to the group at the November's IASG meeting.

IASG Update

14. Liaison has improved since the transfer of responsibility to Professionalism and Trust. The monthly meetings with Chief Superintendent in Professionalism and Trust are helpful. It is noticeable that responses and energy levels are heightened when third parties are in attendance or anticipated at the quarterly meetings e.g. Home Office, HMICFRS. However, there remains some dysfunction in the information flow including regularity of Stop and Search and Use of Force forms, misconduct update, and viewing BWV continues to be difficult to arrange owing to the necessity for IASG Members to attend in person at Bishopsgate. There is currently no option of viewing a shared screen online.

15. CoLP's response to the concerns raised are addressed in Appendix B.

Key Next Steps

16. In November 2023, the current IASG Executive Committee will step down, and job descriptions for the positions of Chair, Deputy Chair, and Secretary have been circulated to the other members of the group to register their interest to stand. Members have been advised to apply for positions by email to the current Chair with a covering note. Elections will take place at the next meeting on Wednesday 22 November 2023.
17. Following elections of the new IASG Executive Committee, a fresh recruitment programme will be conducted with support from the P&T Portfolio. Particular focus will be given to continuing to attract a diverse range of candidates.

Youth IASG (YIAG)

18. The YIAG is scheduled to have its second meeting on the 9 November 2023. At this meeting, discussion will be encouraged as to how the IASG and YIAG may interact according to each groups Terms of Reference/ Operating procedures. This will be discussed between Local Policing and Professionalism & Trust to ensure the groups operate in an effective capacity in providing suitable input and advice from a community perspective to policing in the City of London.
19. The YIAG consists of 13 Members and the age range of the group is 13-19. Since their inaugural meeting, the YIAG have not yet undertaken any IAG activities directly, however, they are currently evolving as a group so activity will take a little while to gather momentum. The specific activities of the group and the roles it will perform will be outlined at the upcoming meeting

Conclusion

20. The relationship between the City of London Police and the Independent Advisory and Scrutiny Groups continues to evolve and strengthen. As outlined in the paper, there remain areas requiring improvement but through more regular dialogue and engagement, progress is being made. The IASG and YIAG are valued groups who provide essential insight and feedback to the Force on matters impacting the community.

Appendices

Appendix A – IASG Quarterly Meeting Agenda.

Appendix B- CoLP Response to issues raised by the IASG

Contact:

T/Chief Superintendent Sanjay Andersen

Head of Professionalism & Trust

Professionalism and Trust Portfolio

City of London Police

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AGENDA			
	Item	Lead / Timing (incl Qs)	Action Required
1	Welcome and apologies for absence	Chair / 5 minutes 18.05	To note
2	Minutes of previous meeting 7 th June 2023	Chair / 5 minutes 18.10	Circulated: one document to approve
3	Outstanding Actions Sheet including Group Recommendations from Reports	Chair / 10 minutes 18.20	To review: one document
4	Stop and Search	Supt Bill Duffy / 10 minutes 18.30	To review: 2 documents P&T Report and Q1 S&S report
5	Use of Force	Supt Bill Duffy / 10 minutes 18.40	To review: as item 4 above
6	Professionalism Standards Update	Professionalism and Trust Team 20 minutes 18.50	Update: 4 documents (P&T update; Child Q; Vetting Refusals; Inclusivity Programme Infographic)
7	November 2023 elections to IASG offices	Secretary / 10 minutes 19.10	To note: 4 documents (Terms of Reference; Operating Protocol; 2 job descriptions)
8	Meeting dates in 2024	Chair / 5 minutes 19.20	No document
9	AOB	Chair / 5 minutes 19.25	No document

Next meeting:

22 November 2023

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Appendix B- Issues raised by IASG and CoLP's response to these concerns.

1. *The Stop & Search records and Use of Force forms sent irregularly for review. There is a continuing absence of feedback to the comments provided.*

Local Policing have appointed a Chief Inspector to liaise with the IASG following their sampling of stop and search and use of force records. This will include commenting on the feedback provided by the IASG and updating on what has been fed back to searching officers.

2. *There is no regular misconduct update.*

Director of Professional Standards attended September's IASG meeting to provide an overview on misconduct through a PSD lens. An overview of CoLP's current misconduct investigations was provided, as well as a breakdown of the reasons for these. The misconduct process was explained, the reasoning behind lead in times, and the duality between legal and police misconduct proceedings.

3. *The question of BWV review remains outstanding.*

The method by which the group review BWV was raised at September's IASG meeting. It was agreed that Superintendent Local Policing and T/Chief Superintendent Professionalism and Trust would meet with the IASG Executive Committee to agree upon necessary process. Members of the group are currently required to attend Bishopsgate in person as there is no capability currently to share footage on a shared screen online. Legal aspects of this must also be considered.

4. *The Use of Force record in respect of taser drawn against the 'Frauditors' has been outstanding since the 20th of June.*

The IASG has indicated in their submission for this report, that they have now received the provision of Use of Force material relating to this incident and comments have been provided to CoLP by email.

5. *Timely vetting of IASG members, , continues to impair the effectiveness of the group.*

This is being actively addressed by the IASG SPOC who has reached out to individual members for further information and documentation to proceed with their vetting applications. Direction has been given that local vetting checks for IASG members are to be completed as priority applications now by the vetting unit.

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Committee(s): Professional Standards and Integrity Committee	Dated: 7 th November 2023
Police Authority Board	22 nd November 2023
Subject: Notifiable Associations - Update	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1- People are safe and feel safe
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Commissioner of Police Pol 116-23	For discussion
Report author: Head of Professionalism & Trust	

Summary

Members of both the Police Authority Board and the Professional Standards and Integrity Committee have at previous meetings voiced concerns regarding the potential risk of corruption associated with officers being members of private associations and groups, and how this risk is managed by CoLP.

The current position is that elected members of the City of London Corporation (CoL) are required to declare memberships of private groups and all CoL staff (including CoLP staff) are required to declare membership of private groups, but Police Officers are not currently required or regulated to make such declarations unless there is a conflict of interest or perceived conflict of interest under the Notifiable Associations Policy.

CoLP’s commitment to be the most inclusive police service is underpinned by improving trust and confidence in policing. Recognising and valuing individuality within its work force ensuring communities perception of the police is one of commitment and transparency. It is recognised that there is currently a disparity between City of London Police Officers and City of London Police Staff, but that in itself is not unusual as both groups operate under very different employment terms and conditions.

The Chief Officer Team discussed this matter at their meeting in September and as a result the below recommendations were agreed:

- CoLP to further review its Notifiable Associations Policy to ensure there is better clarity around what a conflict, or a perceived conflict of interest is, when a member of any private group and provides practical examples.
- CoLP Professional Standards Department is continuing to monitor any national progress on this issue in terms of Associated Professional

Practice (APP) and/or change in legislation and will review the position at that time.

- The Chief Officer Team agreed to voluntarily declare their membership of private groups e.g. Freemason's, Liveries, etc. This 'register' would be subject to annual update (unless the situation changes within that timeframe) and encompass police officer and police staff Chief Officer Team members. The PSD will hold the register and administer the process.

There is an update on the position with regard to the above recommendation in the report which also outlines some of the historical background, inquiries and recommendations on this issue to date. It also covers current provision in Policy, Regulations and the legal position as provided by the City Solicitor.

Recommendation(s)

Members are asked to note the report.

Main Report

Background

1. This report is as a result of discussions at both Police Authority Board, and Professional Standards and Integrity Committee where Members have considered the City of London Police (CoLP) position and the potential for registering of employees who are members of private groups/associations.
2. There has historically been a number of inquiries into cases that have looked into and made recommendations around this issue.

West Midlands Serious Crime Squad, Birmingham pub bombings and Stalker-Sampson enquiry

3. In 1997 The Home Affairs Committee looked at the role of the judiciary, police and CPS as a result of the West Midlands Serious Crime Squad, Birmingham pub bombings and Stalker-Sampson enquiry. There was a recommendation that there should be a register of membership that was publicly available. ¹
4. It was decided at that time that such a register couldn't be legislated and so a voluntary register was implemented, but due to no requirement to declare membership, had limited effectiveness.

¹ [House of Commons - Home Affairs - First Report \(parliament.uk\)](#)
[House of Commons - Home Affairs - Second Report \(parliament.uk\)](#)

Hillsborough Inquiry

5. Following the Hillsborough inquiry in 2016, a register was also recommended in relation to MPS officers.
6. This was refused by Sadiq Khan, in his role as Mayor of London which holds responsibility for Policing in the capital (outside of the City of London)². This decision was based on case law following an ECHR judgement in 2007 that a requirement to declare membership of Freemasonry is a violation of article 11 and article 14³.

Daniel Morgan Independent Panel

7. More recently, the Daniel Morgan Independent Panel (DMIP) published a report in 2021 which contained 24 recommendations. Recommendation 14 in relation to Freemason Membership was progressed by a National working group. The work was undertaken by the National Police Counter Corruption Advisory Group (NPCCAG) which examined all counter corruption intelligence relating to Freemasonry which resulted in corruption.
8. Recommendation 14 stated - "All police officers and police staff should be obliged to register in confidence with the Chief Officer of their police force, at either their point of recruitment to the police force or at any point subsequent to their recruitment, their membership of any organisation, including the Freemasons, which might call their impartiality into question or give rise to the perception of a conflict of loyalties".
9. Work by the NPCCAG to date has included:
 - Producing an evidence base as to the issue of Freemasonry in policing - Data collection circulated nationally and collated. This found only one case of corruption linked to Freemasonry nationally.
 - Legal research into the requirement to 'register' membership of Freemasonry and its compatibility with ECHR.
10. On the 22 June 2023 the Home Secretary presented to Parliament the Government response to the report of the DMIP. As referenced above, Recommendation 14 was that police officers (and staff) should declare their membership of any organisation, which might call into question their impartiality/loyalties.
11. The response of the Home Secretary is that there is a current lack of evidence to suggest that legislation is required. Instead, this will remain under review by the College of Policing as part of the updating of the counter corruption Authorised Professional Practice (APP).

² [Sadiq Khan refuses to make London police declare if they are Freemasons after Hillsborough questions raised | The Independent | The Independent](#)

³ [ECHR \(coe.int\)](#) p33

Current Position

12. The CoLP position currently is that there is a Notifiable Associations Policy, which has recently been reviewed (April 2023). This is with the objective of safeguarding the integrity of all officers and staff and ensuring that all understand their responsibilities under the existing policy with regards to relationships and memberships of any group.
13. The refreshed Notifiable Associations Policy has been re publicised through the CoLP quarterly professional standards newsletter and highlights the requirements of the refreshed policy.
14. However, Members were keen that CoLP specifically consider if there is anything further it could do with regards to registering membership of private groups.

Current provisions

15. Owing to the ECHR decision there is no legal framework to enforce the declaration of association with private groups. It would require new legislation.
16. Additionally, to make officers be 'obliged to register' goes beyond that which is in place currently within Police Regulations, Standards of Professional Behaviour, Code of Ethics and the CoLP specific Notifiable Association policy.

College of Policing

17. The College of Policing are not considering registration of specific private groups in the Counter Corruption Authorised Professional Practice (APP) but have been asked to keep this under review by the Home Secretary as referenced in the DMIP section. The approach the College has adopted is to increase the awareness of conflicts of interest by affiliation to an organisation or group that would amount to notifiable associations. In doing so this ensures it covers a broad spectrum of these types of association without singling out any specific club, membership, association etc. They state that any force policy on notifiable associations should reflect this, and this is what the CoLP policy is based on.

City of London Corporation (CoL)

18. The contractual provisions that apply to all City of London employees, including civilian employees within the City of London Police, are set out in the Code of Conduct and Conflicts of Interest Policy. The key provisions referring to conflicts of interest are as follows:

“Employees and other workers must declare membership of any organisation not open to the public (with formal membership and commitment of allegiance); which has secrecy about rules and / or membership, and / or conduct. For example, the Freemasons, a Society / Trust or an organisation with regular gatherings or meetings not open to members of the public who are not a member of the organisation.”

19. Elected members of CoL are required to disclose memberships which is available to the public, allowing transparency to those who hold such positions.
20. In this regard the CoL policy is more specific in its requirements than the current Force Policy. This does not and currently cannot, apply to Police Officers.

Consultation with the City Solicitor

21. A view from the City Solicitor was sought on the legal position and is shown in below.

Declarations made by employees are not made public and are retained in confidence.

The current position for police officers is that they cannot be compelled to disclose membership of such groups.

The relevant provisions re: restrictions are contained in regulation 6 of the Police Regulations 2003. In particular, reg 6(2) provides as follows:

6(2) No restrictions other than those designed to secure the proper exercise of the functions of a constable shall be imposed by the police authority or the chief officer on the private life of members of a police force except—
(a) such as may temporarily be necessary, or
(b) such as may be approved by the Secretary of State after consultation with the Police Advisory Board for England and Wales.

22. In relation to 6(2)(b) there is currently no legislation requiring a declaration to be made.
23. In conclusion, whilst police staff are required to make declarations under the terms of their employment contracts, the same cannot be said for police officers, who are office holders and, under the principle of policing by consent, are subject to professional standards instead, by virtue of the Police Regulations 2003.
24. In terms of voluntary disclosure, I can see no legal reason why such disclosures cannot be invited. However, this would need to be carefully worded to avoid any conflict with current Standard Operating Schemes (SOPs) within CoLP for registering declarable interests and associations.

Consultation with Police Federation and Superintendent's Association

25. Consultation with both the local Police Federation representative and the Superintendent's Association Chair has been undertaken.
26. In summary, whilst acknowledging the risk around associations with private and other groups, they are of the view that as there is currently no legal framework to enforce declaration of membership of groups and a lack of real evidence of any link between membership of groups and potential corruption, the suggestion of introducing any voluntary register is not supported, as without recourse to any enforcement it would be of little, if any benefit.

Chief Officer Team position

27. At the CoLP Chief Officer Team meeting on the 13th September 2023, a report outlining recommendations for consideration on the current position were discussed. As a result the recommendations below were agreed, and an updated position is included for Members information:

- CoLP is further reviewing its Notifiable Associations Policy to ensure there is better clarity around what a conflict, or a perceived conflict of interest is, when a member of any private group and provides practical examples.

Update: *The policy is reviewed on an annual basis or in cases of legislation or procedural changes. The policy was amended in April 2023 to clarify inappropriate associations and to formalise the reporting of attempts to obtain police information inappropriately through associations.*

- CoLP Professional Standards Department is continuing to monitor any national progress on this issue in terms of Associated Professional Practice (APP) and/or change in legislation and will review the position at that time.

Update: *The force has an extensive network both regionally and nationally with other professional standards departments and the college of policing. It prides itself on remaining at the forefront of any legislative or procedural changes and ensure they are reflected in force policy.*

- The Chief Officer Team agreed to voluntarily declare their membership of private groups e.g. Freemason's, Liveries, etc. This 'register' would be subject to annual update (unless the situation changes within that timeframe) and encompass police officer and police staff Chief Officer Team members. The PSD will hold the register and administer the process.

Update: *The Chief Officer team at the City of London Police recognise the importance of operational transparency particularly with the numerous public private partnerships the Force holds. To secure the ongoing confidence and trust of all CoLP communities and partners the Chief Officer Team has volunteered to disclose their membership of any private, public group or charitable organisations, including livery companies. The details of which will be retained on a confidential system within the Professional Standards Department, therefore open to scrutiny and maintained in a manner consistent with being a member of the police service. In the cases of new memberships, the Chief Officer will contact the Counter Corruption Unit to record the membership. The name, address, date, and purpose of the group will be logged and placed in a separate file within a secure folder. Due to the voluntary nature of*

this process no further action will be taken unless a notification takes place.

If a Chief Officer has a notifiable association as consequence of being a member of a group they will follow the procedure within the Notifiable Associations policy, disclosing membership of any group does not impact this process. The policy follows national guidance and enables the risk assessment of the association which services not only to protect the City of London Police, but the officer and their family.

Conclusion

28. Differing terms of employment underpinned by legislation and police regulations does not currently allow for consistency across both police officers and police staff. This is subject to ongoing review by College of Policing and as mentioned will be monitored by CoLP in terms of any future APP for police officers.
29. However, noting the current drive for transparency and building trust and confidence in the Police Service, the Chief Officer Team will now declare membership of private groups as described.

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Committee(s): Professional Standards and Integrity Committee Police Authority Board	Dated: 7 November 2023 22 November 2023
Subject: Quarterly Equality and Inclusion Update	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1 and 3
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 112-23	For discussion
Report author: Detective Superintendent Kate MacLeod, T/Chief Superintendent Sanjay Andersen, Head of Professionalism and Trust	

Summary

This report provides an update regarding Equality & Inclusion (E&I) activity within the Force from a national and local perspective since the last report to your Committee in September 2023.

The report highlights activity regarding the E&I workstreams, the Police Race Action Plan, work on Violence Against Women and Girls and CoLP’s Inclusivity Programme. It also provides a draft Evaluation Strategy relating to the latter, this can be found at Appendix A.

Recommendation(s)

It is recommended that Members note the report.

Main Report

Background

1. This is a regular report to your Committee provided quarterly. It updates on activity relating to Equality and Inclusion in the City of London Police.

Equity, Diversity and Inclusion Strategy 2024-27 Refresh

2. Our new Strategy has now been through a consultation process with internal partners and presented to our Chief Officer Team. It explains the future direction for CoLP in this space, with all '4P' areas of activity (People, Public, Processes and Partners) pointing towards our mission to become the most inclusive and community oriented police force in the country. The Strategy is presented to this Committee as a separate standalone report for information.
3. Any observations are welcomed and will be incorporated into our final version, this will be an important feeder document into the annual refresh of our Policing Plan.

Current Position

Our Inclusivity Programme

4. We have recently added new dates for a number of events, these were updated by our Corporate Communications team w/c 16th October for internal sign up, they have also been shared with our colleagues in the City of London Corporation who continue to take advantage of these opportunities- at the recent talks from both Asif Sadiq (current special constable and Head of EDI at Warner bros) on his diversity journey and Jake Bowers (Director of Channel 4's '60 Days with the Gypsies') on Gypsy, Roma, Traveller, both had attendance from the City of London Corporation in double figures.
5. We have planned two further '**Focus on**' Sessions for early in 2024, these aim to improve awareness of the Jewish Faith/ Community and provide an understanding of how we can better serve Jewish Communities, these will be delivered by CST (Community Security Trust, a charity dedicated to this cause).
6. We have also now started the **Active Bystander** roll out across CoLP, receiving great feedback from first sessions delivered to colleagues in Professional Standards Department and Human Resources. We are one of the first forces nationally to be delivering this piece, ensuring that both officers and staff have the awareness they need to identify inappropriate behaviours and the confidence to call it out. Our Learning and Development team are working with colleagues in the City of London Corporation to see if there is an interest in replicating this module for members of their training team.

7. We have also been busy designing our **Ethical Dilemmas Programme**. Working with the British Transport Police (BTP), we have put together a training package which will enable Police Inspectors and equivalent staff managers, to conduct conversational sessions with their teams over the coming months. The idea is for participants to be presented with challenging scenarios, many of which will be real-life examples from our own force and others, and to have a psychologically safe space to talk through courses of action. We are aiming to launch this month and next, to also coincide with the launch of the new 'Code of Ethics' from the College of Policing.

Violence Against Women and Girls

8. Nationally, some recent changes in personnel have been announced; NPCC Violence Against Women and Girls lead DCC Maggie Blyth has been appointed as the new Deputy CEO of the national College of Policing, a new Assistant Chief Constable to head up the national Violence Against Women and Girls taskforce within the NPCC will be recruited in due course.
9. Locally, CoLP has submitted its White Ribbon application and will hopefully be in a position to update our panel result verbally at the next meeting. We continue to work with our City of London Corporation colleagues towards a plan to jointly mark the forthcoming period of action (white ribbon 'day' actually running from 25th November through to early December) and link up our communication plans. All men in our Chief Officer Team have signed up to act as Ambassadors to promote our joint ambitions with this Charity.
10. In CoLP, we have arranged for a 'focus on' session to take place online and delivered by the CEO of BeLads [Be Lads – help women feel safer](#) which we will be opening up to City of London Corporation members. We will also have an in person interactive workshop from a Theatre Company 'Alter Egos'. This will shine a spotlight on the reality of misogynistic behaviours, bystander intervention and the impacts of both negative behaviours and positive allyship. All of these sessions have been planned to take place in the period immediately following White Ribbon Day, our media team are fully engaged.
11. Locally, we continue to deliver Op Reframe and our new 'Walk and Talk' initiative with our partners in the City. Both programmes are being considered as we continue to inform our collective response as part of the Serious Violence Duty. We will also use activity taking place between now and during the festive season to help raise awareness of the White Ribbon campaign.

Police Race Action Plan

12. The National Black Police Association (BPA) conference took place in October, this event was well attended by members of our Senior Leadership Team as well as colleagues from CoLP's BPA. In CoLP, we are keen that we continue some of the themes highlighted over these 3 days by marking the launch of our own action plan internally. This will take place in late November with

representatives from CoLP, City of London Corporation and our networks invited, a key note speaker has been arranged and logistics being finalised.

13. CoLP's work against the Plan's 4 Pillars continues, examples of some of our current key activities under our 'Internal Trust and Confidence' pillar are provided below.

Sponsorship Programme

14. As part of our Race Action Plan's work on internal culture, we need to do more to support the recruitment and protect the retention of black, asian and minority ethnic officers and staff and develop our leaders of the future. This initiative will form part of our commitment to positive action, the below timeframe for delivery shows it will link in with our local PRAP launch event.



Positive Action Leadership Scheme (PALs)

15. Our third cohort of PALs started last month, testament to the benefits staff are discovering from this scheme, our Organisational Development team found we were over-subscribed for this cohort so will be delivering a further programme early in 2024. This programme is for constables, sergeants and police staff equivalents from ethnic minority backgrounds. It is a modular programme delivered over nine months and is based on Stephen Covey's 'Seven Habits of Highly Effective People'. The programme focuses on professional development and themes linked to the Seven Habits including building personal resilience, networking, presentation skills.

16. Following the launch of our local Police Race Action Plan (PRAP) later this month, we will be in a good position to start looking at other areas where engagement is required, specifically with our communities to ensure that their voices and feedback are captured at an early stage.

Appendices

- Appendix A – Evaluation Strategy, Our Inclusivity Programme

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Appendix A

'Our People – Inclusivity Programme' – DRAFT Evaluation Strategy

October 2023

Caroline Booth & Det Supt Kate MacLeod, Professionalism & Trust

Introduction

In December 2022 we launched our Inclusivity Programme and began delivering sessions from February 2023 onwards. To date we have delivered 4 Focus On events and 3 Mentivity sessions. We will be delivering Active Bystander, Alter Egos and Ethical Dilemmas from November 23 and will also be delivering further 'Focus On' sessions.

Our original proposal is outlined below, this document pulls together an evaluation strategy to see how the Inclusivity Programme has met its original objectives alongside the work we are doing with VAWG, PRAP and our E&I Strategy.

Original proposal

What do we want to achieve? Learning must:-

- Help us understand people's different journeys and backgrounds to create an inclusive working environment
- Facilitate positive intergroup interaction across different diversity types to reduce prejudice and discrimination
- Showcase the value in diversity of thought and bringing people with different backgrounds into policing.
- Embed the code of ethics and our values within everyone's day to day thinking and work.
- Address contemporary issues of Trust and Confidence in Policing, including examples that are specific to CoLP.
- Re-connect the force with its core policing values (Peelian principles).

How will we measure success?

- Requirement to articulate what we want people to think, feel and do as a result of this programme.
- Measurements could be qualitative (reflective accounts, blogs etc) or quantitative (PSD stats, survey results).
- Checking engagement and compliance will be key- use of PDRs?

Other considerations

- How will we acknowledge the existing level of experience, knowledge and lived experiences?
- Avoiding duplication of training- some will have received inputs already (Mentivity pilot, SMT input by Inclusive Employers, ECD Diversity Day etc)
- Walking the talk – new COT team, being visible, daily behaviours, asking the questions
- Importance of this programme not being viewed as a ‘tick box’ exercise following BLM, Protests etc

Evaluating the impact of the Inclusivity Programme

Evaluating the impact of this programme is based on providing a range of initiatives across a period of time. The evaluation needs to contain different approaches that both evaluate the impact but also continue to embed what we are trying to achieve. The section below outlines the range of activities and timings (8 Steps) which we plan to undertake.

Step 1) Popularity of programmes – immediate

- Attendance data - which programmes have attracted most attendees
- Who has attended
- Breakdown by department / directorate
- Breakdown by officer / staff
- Breakdown by rank / grade

Step 2) Post event evaluation – one week later – MS Forms

- MS Forms survey (to be kept brief) asking following questions:-

- | |
|---|
| <ul style="list-style-type: none">• Why did you sign up to this event?• Would you recommend this event and why?• What did you like about the event?• What did you learn and how will you use the learning? |
|---|

Step 3) Monthly Livechat events

- Post event discussions using renewed Code of Ethics
- Pose a question facilitated by Det Supt Kate MacLeod / Chief Supt Rob Atkin

Step 4) Capturing employee perception of inclusivity – quarterly

- Pulse survey - The Gartner Inclusion Index – this may be linked to cultural audit behavioural change

- Fair treatment: Employees at my organization who help the organization achieve its strategic objectives are rewarded and recognized fairly.
- Integrating differences: Employees at my organization respect and value each other's opinions.
- Decision making: Members of my team fairly consider ideas and suggestions offered by other team members.
- Psychological safety: I feel welcome to express my true feelings at work.
- Trust: Communication we receive from the organization is honest and open.
- Belonging: People in my organization care about me.
- Diversity: Managers at my organization are as diverse as the broader workforce.

- Group review – follow up face to face discussions based on outcomes above

Step 5: Launch event feedback – One year later – Senior Leadership Forum

- Review measures highlighted and provide information on action and impact taken

Step 6: Stay Interviews – 2/3 times a year – link to Matt Bradford

- 2/3 times a year – assess why employer wants to stay and what improvements could be made
- Review themes

Step 7: Workforce and leadership engagement – continuous

- Nudge communications – Inclusion Nudges
- Inclusion Nudges for Leaders | Inclusion Nudges (inclusion-nudges.org)

For Senior Leaders to have a session on inclusion nudges and a copy of the book (available from College of Policing library).

Step 8: Evaluating data

- 2021 data on grievances, complaints etc – baseline prior to introduction of programme
- 2022/23 data – potential increase (active bystander etc)
- 2023/24 data – potential downturn
- Attendance on PALs, sponsorship, mentoring etc AND outcomes

Concluding Remarks

The above steps provide a mixture of both quantitative and qualitative measures, we will use these as a targeted performance framework, incorporating what 'good' looks like, and also predicted timeframes for implementation. We will be able to start incorporating this framework in to forthcoming Committee reports, IASG meetings as well as CoLP's own internal E&I Strategic Board.

Committee(s): Strategic Planning and Performance Committee	Dated: 13 November 2023
Police Authority Board	22 November 2023
Subject: Quarterly Community Engagement Update	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	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 129-23	For discussion
Report authors: Coordinated by Detective Superintendent Carly Humphreys, HQ Services	

Summary

This report aligns with our strategic priorities set out in our [Policing Plan 2022-2025](#) and will report on how we are engaging and working with our communities to understand their concerns and keep those who live, work and visit the city safe and feeling safe. The report also reflects the engagement plans that will be delivered, in particular through our new Neighbourhood Strategy and new innovative digital engagement instruments.

Recommendation

Members are asked to note the report.

Main Report

1. City of London Police is launching a new Community Feedback Platform which will provide a digital pathway to hear from residents, workers and visitors to the City. This is part of a longer-term community engagement strategy to collect feedback regarding our service more generally, as well as victims of crime in the City of London.
2. The Community Feedback Platform will not only be used to inform how we adjust our policing service to respond to the needs of our communities but will help shape the future direction of our Policing Plan and inform our regular community updates, such as through our new Neighbourhood Newsletter (Appendix 1).
3. The Neighbourhood Newsletter is aimed at residents and businesses and provides a detailed update on all of the community engagement initiatives which have taken place and those planned for the next month. The newsletter also provides crime prevention advice and the dates of future Cluster Panels.

4. In October 2023, a Community Feedback Survey (Appendix 2) went live on our internet and across social media platforms to gather opinions on what matters most to our communities. This will inform Policing Plan performance measures for 2024-25.
5. Other methods of community engagement continue through our neighbourhood policing team. These include our Cluster Panel meetings, targeted community events and holding high visibility days with the City Security Council throughout the year to provide reassurance to our communities, demonstrate partnership working and actively engage with our residents and more general footfall within the City. The officers undertake joint high visibility patrols around premises and building footprints to provide a visible deterrent, build positive relationships between the private and public sector, and improve understanding on local concerns. These patrols are supplemented by Hubs offering crime prevention materials, bicycle/property marking and community engagement.
6. We are currently working with the Police Authority to explore how we can integrate these Cluster Panels with other Corporation departments and expect to pilot a joint Panel in early 2024.

What are our communities telling us and how are we responding?

7. The Community Feedback Platform and Survey has just launched and themes from these initiatives will be reported to the next Committee. Themes and remedial actions will be monitored internally through the new Victims Board.
8. Through our existing community engagement mechanisms, the following thematic areas have been raised as issues:
9. This quarter across our Dedicated Ward Panels, many residents raised concerns about general anti-social behaviour and the **anti-social behaviour and bicycle-enabled crime**, particularly phone snatches.
10. In response, our re-launched Police Cycle team has been focusing on hotspot priority crime areas, to improve our local response and interception capability. We are also publicising our work across multiple social media platforms to maximise our community reach of successful interventions and security reassurance.
11. An 'Anti-Social Behaviour Strategic Group' has been formed which brings together departmental leads across the City of London Corporation and Police. There has been an overall reduction in anti-social behaviour year-on-year, however by bringing partners together and reviewing data, this helps us to better understand issues, hotspots and trends, to be able to focus local resources more effectively.
12. The proactive crime team continue to work closely with licensed premises within our community, targeting distraction and bag thieves with some excellent results in recent months including numerous convictions for multiple offences.

The introduction of the new CCTV system is vital in identifying linked crimes due to the quality of the footage. The CCTV system is also used to ensure that it covers known routes of suspects where possible to maximise investigative and preventative opportunities. Outcomes are reported as part of the reporting on the Policing Plan Measures report also on this agenda.

13. Our licensing communities have also raised concerns regarding offending within licensed premises, particularly **bag thefts and violence against security personnel**.
14. Premises have told us they believe that the increase in assaults against staff is linked to 'rejection/no entry' policy due to intoxication levels. The customers then try gaining entry to another premises and when they are again refused, this can increase levels of violence towards security personnel. Our licensing engagement officer is working closely with the Premium Security Operations Director to brief the security teams on how best to respond to these incidents.
15. In response to a national increase in **retail crime**, we have worked collaboratively with local partners to deliver targeted business and retail crime prevention initiatives during our Safer Business Action (SaBA) week (16-22 October). This week saw increased levels of police engagement with our retail communities and security partners with joint high-visibility patrols.
16. SaBA week ran alongside the national 'ShopKind' campaign to encourage positive behaviours in shops, raising awareness of the scale and impact of violence and abuse against shopworkers. A huge benefit across both initiatives has been the support and guidance to retail workers and retail security specifically to increase their personal safety and reduce opportunities for thefts.
17. Our community engagement to improve feelings of **safety across the City, particularly for women and girls** continues. Working with our community partners and the Corporation we continue to deliver Operation Reframe, designed to create safer spaces across our night-time economy and prevent criminality. More recently we have introduced our 'Walk & Talk', a scheme whereby women visiting, working or living in the city can walk and talk with police officers, to share their thoughts on safety to bring about positive change.

Conclusion

18. We continue to work in partnership with the City of London Corporation to enhance the City of London's engagement with our communities. This report has highlighted some of the new and innovative initiatives which have taken place to support this partnership and also our wider national partnerships to protect our local communities.

Carly Humphreys

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Appendices:

Appendix 1: [NHP Newsletter October 2023.pdf](#)

Appendix 2 (web link): [Community feedback | City of London Police](#)

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