



## City of London Police Authority Board

**Date:** WEDNESDAY, 6 MARCH 2024  
**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	

**Enquiries:** **Kezia Barrass**  
**Kezia.Barrass@cityoflondon.gov.uk**

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A recording of the public meeting will be available via the above link following the end of the public meeting for up to one civic year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

Whilst we endeavour to livestream all of our public meetings, this is not always possible due to technical difficulties. In these instances, if possible, a recording will be uploaded following the end of the meeting.

**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 minutes of the Police Authority Board on the 7 February 2024.

**For Decision**  
(Pages 5 - 12)

4. **OUTSTANDING REFERENCES**

Joint report of the Town Clerk and Commissioner.

**For Information**  
(Pages 13 - 14)

5. **CHAIR'S PUBLIC UPDATE**

The Chair to be heard.

**For Information**  
(Pages 15 - 18)

6. **COMMISSIONER'S UPDATE**

Commissioner & Chief Officers to be heard.

**For Information**  
(Pages 19 - 22)

7. **FCCRAS UPDATE**

Chief officer to be heard.

**For Discussion**  
(Verbal Report)

8. **IMPROVING COMMUNICATIONS AND ENGAGEMENT ON CRIME AND POLICING**

Joint report of the Commissioner and the Town Clerk.

**For Information**  
(Pages 23 - 28)

9. **EQUITY, DIVERSITY, INCLUSIVITY UPDATE**

Report of the Commissioner.

**For Information**  
(Pages 29 - 48)

10. **COLLEGE OF POLICING'S CODE OF PRACTICE FOR ETHICAL POLICING - 'THE CODE OF ETHICS' IMPLEMENTATION AT CITY OF LONDON POLICE**

Report of the Commissioner.

**For Information**  
(Pages 49 - 62)

11. **ANTI-TERRORISM TRAFFIC REGULATION ORDER**

Report of the Executive Director of Environments Department.

**For Information**  
(Pages 63 - 68)

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

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

14. **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**

15. **NON-PUBLIC MINUTES**

To approve the non public summary of the Police Authority Board on the 7 February 2024.

**For Decision**  
(Pages 69 - 72)

16. **NON-PUBLIC OUTSTANDING REFERENCES**

Joint Report of the Town Clerk and Commissioner.

**For Information**  
(Pages 73 - 74)

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

The Chair to be heard.

**For Information**  
(Verbal Report)

18. **COMMISSIONER'S UPDATES**

The Commissioner & Chief Officers to be heard.

**For Information**  
(Verbal Report)

19. **NON PUBLIC FCCRAS UPDATE**

Chief Officer to be heard.

**For Information**  
(Verbal Report)

20. **EASTERN BASE PROGRESS REPORT**

Report of the City Surveyor.

**For Information**  
(Pages 75 - 92)

21. **OPERATION SHELBOURNE - HATE CRIME REPORTING USING TRUE VISION**

Report of the Commissioner.

**For Information**  
(Pages 93 - 98)

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**

## CITY OF LONDON POLICE AUTHORITY BOARD Wednesday, 7 February 2024

Minutes of the meeting of the City of London Police Authority Board held at  
Committee Rooms, 2nd Floor, West Wing, Guildhall on Wednesday, 7 February  
2024 at 11.00 am

### Present

#### Members:

Deputy James Thomson (Chair)  
Helen Fentimen  
Jason Groves  
Graham Packham  
Deborah Oliver  
Dawn Wright  
Collett (External Member)  
Andrew Lentin (External Member)  
Sir Craig Mackey (External Member)  
Michael Mitchell (External Member)

#### City of London Police:

Pete O'Doherty	- T/Commissioner, City of London Police
Paul Betts	- Assistant Commissioner, City of London Police
Nik Adams	- T/Assistant Commissioner, City of London Police
Alistair Cook	- City of London Police
Alix Newbold	- City of London Police
Chris Bell	- City of London Police
Gary Brailsford-Hart	- City of London Police
Martin O'Regan	- City of London Police
Mark Paddon	- City of London Police
Steve Reynolds	- City of London Police
Hayley Williams	- City of London Police

#### Officers

Greg Moore	- Town Clerk's Department
Ian Hughes	- Environment Department
Bruce McVean	- Environment Department
Frank Marchione	- City Solicitor's Department
Simon Bradbury	- Environment Department
Richard Riley CBE	- Town Clerk's Department
Charles Smart	- Town Clerk's Department
Josef Shadwell	- Town Clerk's Department
Rachael Waldon	- Town Clerk's Department
Kezia Barrass	- Town Clerk's Department

1. **APOLOGIES**

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

3. **MINUTES**

**RESOLVED** – That the minutes of the meeting held on 31 January are approved as an accurate record.

4. **OUTSTANDING REFERENCES**

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

**RESOLVED** – That the Committee notes the report.

5. **CHAIR'S PUBLIC UPDATE**

Members heard the Chair's public update.

The following points were noted:

The Chair stressed the need for both the City of London Police and City Corporation to be involved in operational planning meetings with the Met Police, Greater London Authority and Westminster Council about the routes for protest marches in London, especially in the context of the ongoing situation in the Middle East.

**RESOLVED** – That the report be noted.

6. **COMMISSIONER'S UPDATE**

Members received the Commissioner's public update.

During the discussion the following points were noted:

- Members welcomed the invitation to the Community Safety Trust meetings, and the Chair was keen to share further opportunities with Members where possible in future events.

**RESOLVED** – that the report be noted.

7. **Q3 CAPITAL AND REVENUE BUDGET MONITORING**

Members received a report of the Commissioner which outlined the Q3 capital and revenue budget monitoring.

During the discussion the following points were noted:

- It was noted that this report had been discussed in depth at the Resource Risk and Estates Committee on the 5 February.
- The Chair welcomed the clarity now being provided on financial reporting and stressed the importance of maintaining a focus on police staff recruitment as well as maintaining police officer numbers.

**RESOLVED** – that the report be noted.

8. **REVENUE AND CAPITAL BUDGET 2024 - 2025**

Members received a report of the Commissioner which outlined the revenue and capital budget for 2024 – 2025.

During the discussion the following points were noted:

- It was noted that this report had been discussed in depth at the Resource Risk and Estates Committee on the 5 February.
- Rate payers were consulted with and responded positively to an increase in the Business Rate Premium.
- The firearms training facility and the police accommodation programme more generally remained areas of focus.
- Members requested an update in the next quarterly Budget Monitoring report which outlines the full capital programme relating to the City of London Police and the source of funding for clarity.
- The Chair thanked the CFO for the improvement in financial reporting.

**RESOLVED** – that the budget be finalised once the BRP raise has been finalised by the Court of the Common Council and the National Lead Force funding would be finalised.

**9. POLICING PLAN REFRESH 2022 - 2025 (24 - 25)**

Members received a report of the Commissioner which outlined the Policing Plan refresh 2024 – 2025.

During the discussion the following points were noted:

- A Member noted a few small points relating to wording which could be amended to improve the clarity of the report. The Chair requested that Members share any suggested edits to the Chief Operating Officer as soon as possible.
- The work around victims was progressing at pace, an expert on victims has been recruited to support this work. The Victim’s Board was driving this work, and a more detailed report on this work would be brought to the Police Authority Board when possible.

**RESOLVED** – That members approve the report.

**10. VISION ZERO PLAN 2023 – 2028**

Members received a report of the Executive Director of Environment, which outlined the Vision Zero Plan 2023 – 2028.

Members noted that there would not be additional financial pressures on the City of London Police resulting from this programme.

**RESOLVED** – that Members approved the report.

**11. PARLIAMENTARY UPDATE**

Members received a report of the Remembrancer which provided a Parliamentary Update.

**RESOLVED** – that the report be noted.

**12. QUARTERLY NPCC BUSINESS CRIME PORTFOLIO UPDATE**

Members received a report of the Commissioner which provided an update on the quarterly NPCC Business Crime Portfolio.

During the discussion the following points were noted:

- The Chair welcomed the report and the good work and engagement with Ministers nationally.

**RESOLVED** – that the report be noted.

**13. CITY OF LONDON POLICE WELLBEING OVERVIEW**

Member received a report of the Commissioner which outlined the City of London Police wellbeing overview.

During the discussion the following points were noted:

- 45 voluntary wellbeing ambassadors from around the Force were in place in 7 teams which represent the 7 categories in the Blue Light Framework
- Members mentioned mental health as a significant impact on wellbeing in the report, and suggested collaboration with City Wellbeing Centre, who were already in operation within the City.
- Members requested that outcome key performance indicators, examples and impact statements should be considered to measure and improve effectiveness in this area in the future.

**RESOLVED** – that the report be noted.

**14. FCCRAS UPDATE**

Members heard an update from the Chief Officer on the Fraud and Cyber Crime Reporting and Analysis Service programme.

During the discussion the following points were noted:

- The programme was progressing at pace and scheduled for delivery in 2024.
- The Branding options were under consideration, and the brand reputation of Action Fraud was taken into account.
- The strategy for engagement with the public and partners was being worked through and would be shared when possible.

**RESOLVED** – that the report be noted.

**15. FUTURE NETWORK STRATEGY**

Members received a report of the Commissioner which outlined the suggested Future Network Strategy.

During the discussion the following points were noted:

- Members agreed the necessity for the new network given that the vulnerability of the force IT network was currently a red risk.
- The cost of the future network is covered by City Fund, and running costs of the system within the City of London Police would be funded by the City of London Police budget.

**RESOLVED** – that the report be noted.

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

There were no questions.

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

There were no items of urgent business.

**18. EXCLUSION OF THE PUBLIC**

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

**19. NON-PUBLIC MINUTES**

**RESOLVED** - that the non public minutes of the Police Authority Board held on the 10 January were approved.



20. **NON-PUBLIC OUTSTANDING REFERENCES**

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

**RESOLVED** – That the Committee notes the report.

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

Members heard the Chair's non public update.

22. **COMMISSIONER'S UPDATES**

Members received the Commissioner's non public update.

During the discussion the following points were noted:

- The Home Office was exploring the potential of an online scams unit, to engage with the tech sector. Large tech firms were assessing the Online Harms Bill and their obligations resulting from it.
- The Lord Mayor has raised questions about the leadership around cyber crime and fraud. The Town Clerk has drafted a response to him to provide assurance of the Police Authority Board and City of London Police's leadership roles.

**RESOLVED** – that Members received the update.

23. **NON PUBLIC FCCRAS UPDATE**

Members heard a verbal update from the Chief Officer of the Fraud and Cyber Crime Reporting and Analysis Service programme.

During the discussion the following points were noted:

- The FCCRAS met on the 31 January and did not agree to extend the IBM contract without funding confirmation from the Home Office. This put the current national service Action Fraud at risk of a break in service.
- The Chair had written to the Home Office twice without response, and an urgent meeting with Home Office officials had been scheduled to outline the issue of National Lead Force funding and its implications.
- Members were keen to ensure that the revised Detailed Implementation Plan included milestones to ensure that any further delays would be picked up instantly. The Chair agreed this oversight was critical.

**RESOLVED** – that Members noted the update.

*Members agreed to extend the meeting at 13:00 under Standing Order 40.*

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

Members received a report of the Commissioner which provided an update on the City of London Police Risk Register.

During the discussion the following points were noted:

- The most significant current risks related to firearms and the national challenge around recruitment and retention of firearms officers. This risk was being carefully monitored and scrutinised.

**RESOLVED** – that members note the report.

25. **FUTURE POLICE ESTATES MEMBER UPDATE**

Members received a report of the Commissioner which provided an update on the Future Police Estates.

During the discussion the following points were noted:

- Positive progress had been made with the Salisbury Square project, and sessions with surveyors and design teams have taken place with the Guildhall Yard East and Bastion House projects
- The biggest risk noted was that most programme delivery dates would be completed in the final quarter of 2026.
- Members asked what information is available to share with residents, it was explained that there was nothing confirmed at this point, and so it was too early to start communications with businesses and residents.
- There had been conversations with Essex Police about the possibility of collaborating on a firearms training facility, and other forces were also looking for a solution to this, which is a national issue.

**RESOLVED** – that the report be noted.

**26. SECURITY REPORT: INFORMATION SECURITY - PROTECTING FROM WITHIN**

Members received a report of the Commissioner which outlined the Security Report: Information Security.

During the discussion the following points were noted:

- The report outlined the City of London Police progress against 26 of the 37 recommendations made in the report
- A second paper would follow to the Police Authority Board to provide further updates on the wider issue of all systems security via the Resource Risk and Estates Committee.
- A recent issue had been raised which related to an administrative error and led to a number of staff that had not been through the correct vetting procedures. Work was ongoing to minimise this risk.

**RESOLVED** – that the report be noted.

**27. REVENUE AND CAPITAL BUDGET NON PUBLIC APPENDICES**

The Board received a report of the Commissioner which provided the non public appendices to be read in conjunction with item 8.

**RESOLVED** – that the report be noted.

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

There were no questions.

**29. 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.

**30. CITY OF LONDON POLICE RISK REGISTER UPDATE - CONFIDENTIAL APPENDIX**

Members received a report of the Commissioner which provided an overview of confidential risk register.

During the discussion the following points were noted:

- A systems failure had occurred in November 2023, and substantial time was taken to recover the system and access sensitive data.

- Concerns were raised that the back up system and recovery plans had failed.
- An independent review had been commissioned between the Police Authority and the City of London Police.
- The Chair assured Members that the risk and issue was managed appropriately
- The Chief Officer reported that no data has been lost.

**The meeting ended at 13:29**

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Chairman

**Contact Officer: Kezia Barrass**  
**Kezia.Barrass@cityoflondon.gov.uk**

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## City of London Police Authority Board – Public Outstanding References

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	<b>In Progress-</b> At 24 <sup>th</sup> May 2023 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 <a href="#">draft Terrorism (Protection of Premises) Bill</a> , also known as Martyn's Law, for pre-legislative scrutiny by the Home Affairs Select Committee.
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	<b>Complete-</b> This is an item for information on the agenda. .
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	<b>Complete-</b> This was presented at SPPC on the 22 February and is an item for discussion on the agenda.

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<b>Committee(s):</b> Police Authority Board	<b>Dated:</b> March 2024
<b>Subject:</b> Chair's Update	<b>Public</b>
<b>Report of:</b> James Thomson	<b>For Information</b>

## **National Lead Force – engagement**

Political engagement continues, promoting the work of COLP as National Lead Force. There was a productive visit of the Shadow Attorney General, Rt Hon Emily Thornberry MP, on 19<sup>th</sup> February. Ms Thornberry is leading on developing Labour's fraud policy position, so the meeting was a useful opportunity to outline the work of the force and areas where further progress could be made across the whole system to make best use of the recent investments made by Government. I also met Rt Hon Liam Byrne MP, Chair of the Business and Trade Committee, to update him on the work of the force around economic crime and the importance of a strong and secure economy to the future prosperity of the UK. It was clear from that meeting that economic security will be the subject of significant political focus in the coming period. I am pleased to report that the focus on economic security will also be reflected in the City of London Corporate Strategy 2024-2029 and goes broader than tackling fraud, economic and cyber crime but includes supply chain resilience and being resilient to global shocks.

The Authority is also working with COLP developing further opportunities to engage with the Tech Sector and demonstrate the benefits of collaborative working between the private sector and law enforcement to tackle fraud.

## **Budget for 2024/25**

I have reported previously on the correspondence the Commissioner and I have sent to Home Office Ministers since summer 2023, raising concerns about National Lead Force funding not benefiting from the inflationary and other increases allocated elsewhere in policing. Following recent constructive discussions with officials, I'm pleased to say that this funding has now been increased by £7m for 2024/25, which will enable the City to sustain and increase officer and staff resourcing levels in line with grant expectations – to support achievement of the deliverables required by those grants. I am grateful for the support shown by the Home Secretary and his Ministers in confirming this uplift.

At the City Business Ratepayers meeting on 30 January, there was no concern raised by the proposed 0.4p increase in Business Rate Premium and at Finance Committee on 20 February this was also approved. It is now to be put to the meeting of the Court of Common Council on 7 March.

## **Middlesex Street**

A major milestone was reached on 13 February when the Corporation's Planning Sub Committee approved the proposal for the City Police's new Eastern base Middlesex Street. A huge amount of work has gone into this, from the City Police,

Corporation Officers, architects and Members. My thanks go to all those involved. The City Police estates programme is gathering real pace – ensuring we have accommodation and facilities which meet the operational needs of City police officers and staff will remain a key priority for the Authority.

The outstanding priorities are: firearms training facility where we are exploring a joint venture with another police service, a property store which we hope to fund a suitable location within surplus and unutilised space within the City of London and a permanent location for the Mounted Unit.

### **Stephen Lawrence Day event in the City: 23 March**

Work is well underway for the event we are hosting in the Guildhall on 23 March to mark Stephen Lawrence Day. I am keen that we build on the success of the similar event we hosted last year, which marked the 30<sup>th</sup> anniversary of Stephen's death. This year, we are inviting around 200 attendees, about two thirds of whom will be young people aged 15 – 18, drawn from City Schools and Academies, schools with City links in neighbouring boroughs, local cadet forces, and youth charities that are linked through the City. The event is being planned in conjunction with the City of London Police (who will be talking about the new Equity, Diversity and Inclusion strategy they are developing) and others including the Stephen Lawrence Day Foundation and the Prince's Trust.

The objective of the day is to recognise the impact of Stephen's legacy, build better relationships between policing (e.g. City of London Police), institutions (e.g. the City Corporation) and the communities they serve, and inspire people towards more equitable and successful futures. We are using the Stephen Lawrence Day Foundation's approach to marking the anniversary this year as a template for our event: thinking about the past, present and future, with a strong power of learning theme.

It would send a strong message if Police Authority Members visibly supported this event. This year marks the 25<sup>th</sup> anniversary of the Macpherson Report which was, of course, prompted by Stephen's murder. There is still much to do around the issues highlighted in that seminal report.

### **Serious Violence Duty Strategy; Victims Strategy**

The City's strategy to reduce serious violence, discussed at the Police Authority Board in December 2023, was published in January (available [here](#)) and shared with the Home Office. A delivery plan has now been developed and implementation work will commence in earnest in March – the Crime and Disorder Scrutiny Committee will receive an update on progress at its summer meeting. Members should also note that the City will be receiving £1m Home Office funding for policing initiatives on serious violence and anti-social behaviour next year (2024/25) – a plan for using this is also in development.

A full draft of the City's victims strategy has been produced and is being reviewed internally. Informal external engagement is planned over March and April ahead of a May target for submission to the Police Authority Board and, if approved there, publication. Members who are interested in reviewing a draft earlier or otherwise



being involved before May should contact Charles Smart in the Police Authority Team ([Charles.smart@cityoflondon.gov.uk](mailto:Charles.smart@cityoflondon.gov.uk)).

## **Safe Havens**

I'm really proud to say that The City of London Corporation's Guildhall headquarters, specifically the West Wing, has been designated a 'Safe Haven' for women and girls in the Square Mile. This means that trained staff will support people who may be in need by contacting emergency or specialist services on their behalf, and providing water, Wi-Fi, telephones, toilets, and other facilities. My thanks go to the Community & Children's Services Committee, Corporation officers, the Lady Mayoress, Safer Business Network, and the City of London Crime Prevention Association who have all been involved in developing and supporting the safe haven initiative.

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# Agenda Item 6

<b>Committee(s):</b> Police Authority Board	<b>Dated:</b> 6 March 2024
<b>Subject:</b> Commissioner's Update	<b>Public</b>
<b>Which outcomes in the <i>City Corporation's Corporate Plan</i> does this proposal aim to impact directly?</b>	1- People are safe and feel safe
<b>Does this proposal require extra revenue and/or capital spending?</b>	N/A
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	N/A
<b>Report of:</b> Commissioner of Police Pol 38-24	<b>For Information</b>
<b>Report author:</b> Peter O'Doherty, T/Commissioner	

## Summary

It was agreed that the Commissioner's verbal updates would 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.

**Operations and Security**

**PAB Updates**

**Major Incident Exercise**

On 23<sup>rd</sup> January 2024, City of London Police led a Major incident exercise. The Strategic Coordination Group chaired by Assistant Commissioner Betts was attended by the London Resilience Group and a number of key partners including the City of London Corporation, business community, fire brigade and ambulance service. The exercise tested resilience, resources and inter agency collaboration reassuring CoLP are ready to respond to a major incident in the City.

**Race Equality Week**

From Monday 5<sup>th</sup> to Sunday 11<sup>th</sup> February, City of London Police (CoLP) supported Race Equality Week, an annual UK wide movement uniting hundreds of thousands of organisations and individuals to address the barriers to race equality in the workplace. This years theme ‘Listen Act Change’ encouraged officers and staff to undertake the 5 day challenge which included watching short videos, reading articles and undertaking challenges giving colleagues an opportunity to learn, self-reflect and commit to action that will drive change, promoting CoLP’s continued commitment to inclusivity and equality. Fuller updates on this are provided to your Professional Standards and Integrity Committee.

**Cycle Team**

On 30<sup>th</sup> January 2024, BBC showcased CoLP’s Cycle team’s drive tackling illegal e-bikes often used by criminal gangs to commit phone snatches and anti-social behaviour which has seen a reduction in phone snatches from January 2023 by 35%.

The Cycle team continue to concentrate on engagement, education and enforcement which has seen in January 2024

Fixed Penalty Notices	140
Cycle warnings	227
Intel reports	21
Seized e-bikes/scooters	35

**Theft Arrest**

Plain clothes officers swiftly apprehended a male who had committed a theft from Sainsburys. Following a diligent and expediate investigation, CID officers linked the defendant to 9 other City burglaries/thefts and 3 in the Metropolitan police area resulting in his charge and remand in custody.

**Serious Assault Arrest**

A female victim returned to her hotel room after being out in the City where she has reported being raped by 3 males she had met earlier in the evening. Officers have quickly deployed to the hotel in response to this extremely serious allegation, safeguarded the victim and apprehended the suspects. The victim focused approach by multiple different teams within CoLP led to all 3 suspects charged for Rape and remanded in custody. The victim continues to be supported by specially trained officers.

**Shoplifting arrest**

Officers on patrol around Liverpool Street Station spotted a male wanted by police for a number of thefts committed in the Moorgate area. He was quickly apprehended identifying he had recently committed a theft from a store within the station. Officers were able to link him to a number of crimes allowing him to be charged and remanded in custody, safeguarding retailers from further thefts.

**Strategic Leadership and Engagement**

On 23<sup>rd</sup> January 2024, Tom Tugendhat the Security Minister visited the City of London Police to receive a briefing on Fraud & Cyber Crime. Minister Tugendhat was given a tour of National Fraud Intelligence Bureau (NFIB) and the operational fraud teams which was well received.

On 12<sup>th</sup> February 2024, the Stop Think Fraud national campaign launched. The national campaign against fraud supports the delivery of the UK Government’s Fraud Strategy. It has been created to empower a mass audience, and help people take action that will prevent them falling victim to fraud. The campaign will drive the public to a new website, where they can find advice and guidance on how they might be at risk, how to spot fraud, how to report it to Action Fraud and how to protect themselves. The City of London Police is a strategic partner of the campaign and committed to its success. T/AC Nik Adams completed media interviews with LBC Radio and ITV Lunchtime news promoting the new campaign.

**Operational activity highlights**

Op Downburst – A complex fraud investigation that started in 2019 resulted in a suspect being sentenced to five years imprisonment after being convicted as the architect of a twelve-million-pound boiler room scheme. Victims were offered investments in either commodities, traditional share dealing, binary options, cryptocurrency, and/or initial public offerings. Some were told that large returns were guaranteed, and that money can be withdrawn at any time. The suspect used the proceeds of the investment fraud to purchase high-end luxury cars, as well as gold bullion and luxury jewellery and watches – all of which were seized by officers. Confiscation proceedings are ongoing to compensate victims.

DCPCU filmed with BBC One’s ‘Moment of Proof’ discussing OPERATION EVE and our successful prosecution of an offender, who was initially identified trying to open bank accounts in the names of others, using fraudulent documentation. Evidence also showed that the offender was part of a gang that laundered the fraud funds. He was tutoring others in scam techniques and arranging for money mules to be used as part of the fraud. The total fraud was £290,889 with some of the victims being charities. The suspect received six years and six months imprisonment for his offending.

**National Support & Co-ordination**

Operation Henhouse 3 launched in February with executive action planned across England and Wales in addition to Northern Ireland and Scotland. All 43 forces and 9 regions are participating. OP Henhouse is funded through National Economic Crime Centre (NECC) and the police element coordinated through the Lead Force Operations Room (LFOR).

Week 1 has seen 77 arrests and 35 voluntary interviews completed, with 41 Cease & Desist notices issued. 19 Asset Freezing Orders have resulted in £1.4m of frozen funds. Additionally South Wales Police has seen a restraint order for £1.2m, 49 Seizures/Disruptions have resulted in £906k of cash seizures, Crypto restraint and assets.

T/AC Nik Adams opened the Team Cyber United Kingdom conference on the 13<sup>th</sup> February 2024. This is the largest law enforcement conference in the UK focusing specifically on the threat of cybercrime. It is hosted by the City of London Police, National Crime Agency & National Police Chief Council. The conference was attended by over 350 representatives from across the UK and law enforcement representative from around the world. The City of London Police as the lead for cyber-crime took a central role providing input to colleagues across a diverse range of topics from investigational case studies and strategic inputs.

**International Support & Co-ordination.**

DCI King attended a Cyber Security conference in the Grand Cayman Islands as a subject matter expert. She is also the chair of the City of London Police Women’s network which is twinned with the Grand Cayman Police’s women network.

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<p><b>Committee(s):</b> Strategic Planning &amp; Performance (Police) Committee – For information</p> <p>Police Authority Board – For Information</p>	<p><b>Dated:</b> 22 February 2024</p> <p>6 March 2024</p>
<p><b>Subject:</b> Improving communications and engagement on crime and policing</p>	<p><b>Public</b></p>
<p><b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b></p>	<p>1, 4, 12</p>
<p><b>Does this proposal require extra revenue and/or capital spending?</b></p>	<p><b>N</b></p>
<p><b>If so, how much?</b></p>	<p>£-</p>
<p><b>What is the source of Funding?</b></p>	<p><b>N/A</b></p>
<p><b>Has this Funding Source been agreed with the Chamberlain’s Department?</b></p>	<p><b>N/A</b></p>
<p><b>Joint report of:</b> Commissioner of Police &amp; the Police Authority Director Pol 28-24</p>	<p><b>For information</b></p>
<p><b>Report authors:</b> Emma Cunnington, Head of Strategy and Planning. Richard Riley, Police Authority Director.</p>	

## Summary

This paper sets out a joint plan to improve communications and engagement with City communities. It provides a brief background on our legal obligations and current engagement panel structures and sets out a focus on widening engagement and improving coordination and collaboration. It outlines some ideas for changing how we run our engagement panels to achieve these aims including restructuring the cluster model or building into other engagement forums.

## Recommendation(s)

Members are asked to:

- Note this report and discuss the options

## Main Report

## Background

1. Police Reform and Social Responsibility Act 2011 sets out the following obligations:
  - a. local policing bodies/PCCs must have regard to community views of policing in that area
  - b. police forces and PCCs must engage with communities to inform Police & Crime Plans priorities

- c. police forces must obtain views of people in each neighbourhood about crime and disorder and make them aware of information about policing in that neighbourhood
2. The College of Policing has also produced detailed guidance<sup>1</sup> for how police forces and their PCCs should deliver effective neighbourhood policing supported by engagement and consultation with their communities.
3. Key principles of this guidance include: having a visible policing presence on the ground, conducting regular, transparent, and tailored engagement, effective joint-working with partners, making effective use of engagement (to identify local priorities and inform problem-solving), and to provide regular feedback and be accountable for responding to community input.
4. City Police operates a dedicated ward officer model under which named officers are responsible for clusters of City wards, in which they hold formal ward panels, conduct wider informal engagement with individuals and businesses, and hold specific responsibility for responding to and managing crime and disorder.
5. In 2023 the City Police published a new Neighbourhood Policing Strategy<sup>2</sup> which, among other measures, commits to improving two-way dialogue with communities, strengthening local partnerships, embedding a problem-solving culture, and developing the skills (including around engagement) of officers, staff, and volunteers.

## **Current Position**

6. City of London Police and Police Authority have been exploring options to improve communication and engagement with the City's communities, and are focussing on the following priority areas:

### Widening engagement

7. Our aim here is to talk to, and hear from, a wider range of people and communities in the City, including hard-to-reach groups. The small number of attendees to the current ward panel meetings, and those who tend to complete the Annual Community Survey run by the City of London Police, do not reflect the rich diversity of our communities. In the short term we will explore alternative ways of reaching our three key audiences: residents, workers and businesses.
8. In the longer term, the Police Authority will launch a new workstream to more fully map the City's communities so we better understand our audiences and stakeholders.

### Improving coordination and collaboration

9. Our aim here is to better coordinate communications and engagement across the City of London Police, Police Authority, and wider Corporation (including, for

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<sup>1</sup> [Link](#)

<sup>2</sup> [Link](#)



example, the Safer City Partnership). The key issue is that there is not an established framework for full coordination, and this means we are not taking full advantage of the scope to amplify specific messaging and initiatives, link up on joint campaigns, and generally work together most effectively.

10. In the short term, we will set up fortnightly meetings to focus on City community communications and engagement between the City Corporation and the City of London Police, similar to the weekly economic, fraud, and cyber-crime focused Strategic Communications and Engagement Planning (SCEP) group. This group will meet to discuss nearer-term proactive plans and issues, and in due course improve longer-term planning.

11. In the longer term, we will improve future planning on communications and engagement between the City of London Police, Police Authority, and Corporation – with better sharing of upcoming initiatives and more joint campaigns. We will map full communication and engagement objectives and plans in fuller detail to identify commonalities and areas of overlap.

### **Options for developing our approach to engagement panels**

12. We are interested in exploring how we can develop our approach to engagement panels with Members to widen our engagement and improve coordination and collaboration.

#### Option 1: Maintain current cluster panel approach

13. In this option we would retain the current structure of quarterly meetings for the City's 6 current ward clusters<sup>3</sup> but implement changes to make them more visible, accessible, relevant, and responsive (see Appendix 1). As other Corporation departments cannot resource this level of engagement it would remain led and focussed on policing. The disadvantage of this is many people want to discuss issues that are broader than policing and crime. It does not achieve the aims of improving coordination across the Corporation departments, or recognise the important role of Corporation preventing crime and disorder.

14. An alternative would be for clusters to be consolidated into two regions (East and West) and run bi-annually for each. This would be less resource intensive for other Corporation departments but may still not be achievable with current levels.

15. We will supplement these cluster panels with specific outreach and engagement campaigns with City workers through the Corporation's City Belonging network. For example, an awareness and education initiative on violence against women and girls which aligns with publication of our Serious Violence strategy and the priorities of the incumbent Lord Mayor and Lady Mayoress.

16. We will also continue to develop our engagement with businesses through the Business Improvement Districts who are now also represented on our multi-agency Safer City Partnership Board.

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<sup>3</sup> Barbican, Bank, Fleet Street, Liverpool St, Fenchurch St, Monument

## Option 2: Build on existing Corporation engagement forums and implement local surgeries

17. This option would capitalise on the audience and forum provided by the Member-led City Question Time run 4 times a year, by providing a breakout engagement panel focussing on crime and community safety. This would be in partnership with Children & Community Services and Environmental Health and any other relevant departments, before or after the session. The benefits of this approach are the ability to present as a joined up organisation and to maximise attendance through the focus of the Corporation. However, having the two sessions back to back may be a detraction for the public in terms of their time commitment. It should be noted that these events currently primarily attract residents and are Member led, whereas the panels would be officer-led. Any exploration of this as an option will require consultation with Members beyond the Police Authority Board and more detailed scoping at an officer level.
18. This approach would be supplemented by regular police surgeries where dedicated ward officers would base themselves in common spaces (eg libraries), and encourage people to speak with them individually about their concerns. We are also interested in trialling these surgeries in large businesses to test effectiveness for widening our engagement with the worker population.

### **Corporate & Strategic Implications**

19. Strategic implications – By improving engagement with our communities, we will better understand public perceptions and improve our service to the public. This will help to contribute to the Policing Plan objective to keep those who live, work and visit the City safe and feeling safe. In addition, this work will contribute to the City Corporation's new Corporate Plan 2024-29 objectives including Diverse Engaged Communities, Providing Excellent Services and Vibrant Thriving Destination. Finally, by working together, the City of London Police and the Corporation will better collaborate and improve ways of working as set out in the Target Operating Model.
20. Financial implications – can be contained within current budgets.
21. Resource implications – the level of resource varies depending upon the option and would require commitment from other Corporation departments to support.
22. Legal implications – effective community engagement will support our legal obligations under the Police Reform and Social Responsibility Act 2011.
23. Risk implications – none.
24. Equalities implications – When implementing plans under these priorities, we will continue to be mindful of the Public Sector Equality Duty 2010 and ensure there is no negative impact on people protected by existing equality legislation. The

proposals in this report intend to improve accessibility for the whole community to engage and to better understand service needs.

25. Climate implications – none.

26. Security implications – none.

## **Conclusion**

27. This report sets out some ideas for how to widen engagement and improve coordination and collaboration across the Corporation. In order to develop these approaches further consultation is required with officers and/or Members.

28. City of London Police and the Police Authority will continue to explore how communications and engagement can be improved drawing upon guidance issued by the Association of Police & Crime Commissioners, College of Policing and good practice elsewhere in policing. Our approach will continue to seek opportunities to maximise benefits of a coordinated approach across the Corporation, for example how we can align and improve response rates to public surveys and consultations.

## **Annexes**

- Appendix 1 – Detailed plans to improve engagement panels

### **Emma Cunnington**

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Detailed plans to improve engagement panels

<p><b>Explanation</b> – This table sets out four attributes that we believe engagement panels should have, what they each mean, and ideas to achieve these</p>
<p><b>I. Visible</b> - Communities need to know about engagement panels in general and individual meetings specifically</p> <p>Options to achieve include:</p> <ul style="list-style-type: none"> <li>• Focussed social media campaigns, followed by regular signposting on social media channels</li> <li>• Making sure community leaders &amp; heads of networks (Members, businesses, resident groups, local associations, BIDs) know about them and are directing members of their communities toward them, including with dedicated mailing lists and automatic reminders</li> <li>• More prominent and/or more intensive advertisement in physical spaces – on estates, in businesses, in high-footfall public spaces</li> <li>• Advertising and signposting via other existing messaging routes– Barbican residents newsletter, City Police community surveying platform, etc.</li> </ul>
<p><b>II. Accessible</b> – Engagement panels need to be as easy as possible to attend</p> <p>Options to achieve include:</p> <ul style="list-style-type: none"> <li>• A review of past dates, times, locations of panel meetings to assess if there are issues with this</li> <li>• Periodically basing panel meetings in high-footfall locations (e.g. Liverpool St station or Cheapside), or in places where people are already going (e.g. food markets, larger retail banks, larger shops, Corporation buildings)</li> <li>• Make meetings shorter, and ensure they run to schedule</li> <li>• Explore holding some meetings online or creating online option for in-person meetings</li> </ul>
<p><b>III. Relevant</b> – Engagement panels need to be about issues that matter to people</p> <p>Options to achieve include:</p> <ul style="list-style-type: none"> <li>• Periodically hold ‘thematic’ meetings that attract people with specific concerns</li> <li>• Improve targeting of meetings at businesses and SMEs, who may be under-reporting crime (this may include hosting meetings in businesses)</li> <li>• Broadening beyond policing to enable people to discuss a range of issues</li> </ul>
<p><b>IV. Responsive</b> – People need to see and feel that we are responding to issues raised at engagement panels</p> <p>Options to achieve include:</p> <ul style="list-style-type: none"> <li>• Implementing a ‘you said, we did’ format both at panels themselves and potentially online (e.g. a webpage tracker setting out responses)</li> <li>• Report on themes of cluster panels to SPCC</li> <li>• Promote successful panel-related initiatives on police and Corporation comms channels</li> </ul>

# Agenda Item 9

<b>Committee(s):</b> Professional Standards and Integrity Committee Police Authority Board	<b>Dated:</b> 27 February 2024 6 March 2024
<b>Subject:</b> Equity, Diversity, Inclusivity Update	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	1- People are Safe and Feel Safe
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N/A</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>N/A</b>
<b>Report of:</b> Commissioner of Police Pol 30-24	<b>For Information</b>
<b>Report author:</b> Kate MacLeod, D/ Supt, Professionalism and Trust	

## I. Summary

Force engagement continues on key Equity Diversity and Inclusivity (EDI) strands, current focus in particular is on the Race Action Plan and ensuring we build on momentum from November’s launch, workshops arranged for later this quarter will help further cement roles and responsibilities with our leadership team. Competing action plans and priorities across a number of EDI areas continue to place additional demand on our leadership. As well as addressing this, a focus in this reporting period has been work to inform the establishment of a refreshed EDI Governance and internal scrutiny framework that better reflects the maturing nature of this portfolio.

The team have worked hard to produce our first evaluation paper of our Inclusivity Programme, incorporating views from Committee members, next steps focus on capturing longer-term behavioural change.

Two significant pieces from the College of Policing are the recent roll-out of the new Policing ‘Codes of Ethics’ and the ongoing development of the National Leadership Programmes. Our proposal on the latter will be a significant opportunity for the force; a deliverable intrinsically linked to the start of PEEL 2025, our response to Staff Survey and our EDI Strategy launch.

The EDI strategy (as per separate paper) is nearing finalisation having captured a range of inputs internally and externally. Once finalised the success measures will be monitored by Professionalism & Trust and form part of the performance framework being evolved and reported against.

## II. Evaluation of Our Inclusivity Programme

Taking on feedback from our Members, the team has produced their first evaluation of the Inclusivity Programme and very much welcome further feedback from Members as this evolves. The full document can be found at Appendix A, with Compliance data at Appendix B.

Our Inclusivity Programme is an attempt to deliver awareness training to all of our officers and staff across areas of Equity, Diversity and Inclusion. However, instead of mandating classroom-style delivery, individuals are encouraged to choose from a range of modules according to their learning style and knowledge gaps. This allows us to move away from what could be perceived as a 'tick box' exercise to something which holds real meaning for those attending.

Modules evaluated this quarter are below, key evaluation points follow thereafter:-



- We know that 1,263 courses have been attended, 1,622 employees are eligible to undertake a module.
- For each module, 100% of respondents said that they would recommend to others.
- Quick time feedback has allowed us the opportunity to tweak delivery whether this be length of session, changes to content and so on.
- Some of the value of these sessions is simply not quantifiable- the quotes provide really valuable feedback which should still be captured.
- Once our EDI reporting dashboards are in production, we will also be able to look at other data (across areas such as recruitment, retention, promotion, standards of behaviour and so on) to assess what impact the Programme is having on force culture more widely. We understand this piece is vital.
- 'Next steps' have been noted for each module. We now need to ensure that we are messaging this back to our workforce so that they can see the value in providing feedback and some tangible action being taken as a result- a 'you said – we did' approach may work well.
- More generally, we need to improve feedback response rates in some areas (i.e. 17% completion for Mentivity), we have found that taking time to personally email respondents has already seen improvements.

### **III. EDI Dashboard**

The EDI Strategy 2024-27 is an updated draft and is also an item on the agenda today for information., The proposed measures for evaluating progress, which are included within the draft, are still in development and undergoing consultation.

Once the measures have been agreed, we will work with relevant departments internally to ensure that a dashboard is produced to support reporting requirements across different governance platforms. This will provide a current force picture of where we are with reporting measures and rolling quarter-by-quarter updates.

### **IV. Key issues, risks, and mitigations**

#### **Resourcing and Demand**

Owing to temporary abstractions there is still considerable demand on the remainder of the team. Efforts are being made to backfill where appropriate.

We have also recruited into one of the vacant PC posts and are awaiting their release (planned for March 2024). We need to progress recruitment of the additional PC/s.

Finally, we are awaiting the results of the current Chief Inspectors Promotion Process and decisions on the postings which will follow and allow us to fill this vacancy (posting expected early April 2024).

#### **Force Engagement on Police Race Action Plan ('PRAP') and Wider EDI Governance**

The PRAP provides a real opportunity for every force in the UK to commit to change in this really important space. However, Nationally it is clear that the plan has not been as developed as fully as the programme team has initially envisaged, there remains a real risk that this is not getting the traction it requires.

In completing our launch event in November 2023, we were able to send a clear message to our teams that we are prioritising action to ensure that black people are represented in our work force, not over-policed, are involved and not left under-protected. As a force, we have worked with our networks and associations to prioritise a range of actions under each of these pillars.

We continue to receive feedback from the 'online' version of our launch event; it is clear that the majority of our workforce who have attended are understanding the need for a Plan. However, the issue we have is how we inject this enthusiasm and maintain momentum with our leaders across the force, appreciating the many other competing priorities and demand from what is perceived as 'business as usual' v's

'additional work'. Dr Angela Herbert attended a Senior Leaders Forum back in July '23 where she explained that our 'PRAP' is a priority for ALL departments and not just for Professionalism and Trust; with so many actions to be completed within different specialism, it needs to be force effort and thread that runs throughout each team's plans of work.

A workshop took place with Professionalism & Trust leadership and Dr Herbert earlier in January with a further session in early February. The aim of these is to finalise next steps for PRAP, we have agreed to hold further sessions with our Senior Leaders in early March, the planned outcome from these is to:-

- Agree on ownership of actions across the force
- Gain an understanding of what support is required from Professionalism & Trust
- Convey clear mechanisms to hold people to account for their actions within wider EDI governance.

We will also be launching our Sponsorship Programme for Black and Asian colleagues later this month, a key deliverable for our PRAP, uptake will be reported at the next Board. The Chief Officer Team are supporting this initiative as sponsors.

### **International Conflict in the middle east and Impact on CoLP**

We know that there have been increasing concerns that Jewish and Muslim communities are feeling unsafe and that the coverage of the conflict in Gaza is impacting on their wellbeing, daily movements, and feelings of overall safety. Police engagement with these communities suggest that this sentiment is also evident in the City. To support this, there has been increased engagement, taskings and dedicated operations to monitor and provide extra support. A review is currently underway to ascertain whether we have seen an increase in antisemitic crime since events of October last year.

Internally, we have created a rolling log for the conflict to provide our people with relevant messaging and signposting for those requiring further assistance. Professionalism and Trust have offered to host private conversations with anyone feeling particularly concerned; 3 such approaches have been made. We are also in regular conversation with members of our Association of Muslim Police, appreciating that they are in a transitional period due to the departure of previous Executive Committee members. To bridge this gap, a series of workshops have taken place to talk through future ways of working and provide ongoing support. Elections are planned for the first quarter of this year and internal communications publicising this have been circulated.

As part of our Inclusivity Programme we have led two sessions for our officers and staff to help them better understand the Jewish faith and recognise antisemitic crime, these have been delivered by the Community Services Trust (CST). Over 60 officers attended a face to face briefing in January, with an online version planned for later this month. We also had representation from the Corporation. Next steps are to ensure that our communities are getting the same reassurance



and signposting. Professionalism and Trust are also working to ensure that inputs are provided on islamophobia and protecting victims of anti-muslim hate, to ensure a balanced approach.

## **V. Notable national issues and developments**

### **National Violence Against Women and Girls Programme Changes**

As of 7<sup>th</sup> November 2023, ACC Samantha Millar QGM, has taken over as the Strategic Programme Director for the National Police Chiefs' Council Violence Against Women and Girls (VAWG) Taskforce. ACC Millar had previously been the Programme Lead for the Taskforce under DCC Maggie Blyth since early 2022.

ACC Millar is responsible for leading the team, which is delivering Policing's National focus on VAWG, DCC Maggie Blyth, who is the Deputy CEO of the College of Policing, continues to be the NPCC lead for VAWG. However, her role is now primarily focused on ministerial and parliamentary engagement, she will continue to update via Chiefs' Council.

A list of National dates and workshops for 2024 has been distributed; of note for us as a force are the publication of the framework for delivery 2024-2027 and self-assessment which we have in our calendars to complete and will bring any areas of note to this board. The Nationally mandated action plans are now moving from a '3 pillar' to a '4 P (Prevent, Prepare, Pursue, Protect) template, which Professionalism & Trust will review and adopt ahead of HMICFRS inspections.

### **National Police Race Action Plan Update**

As Senior responsible Officer for the National PRAP, Chief Constable Gavin Stephens has recently underlined his role in providing an inclusive environment where colleagues can share views, so we can understand each other and agree action "We have unanimously agreed that we have a duty to improve policing for Black people by becoming an anti-racist police service".

There is a new reiteration of the plan coming in summer 2024 which will likely not be greatly different from the current version. Of note, a benchmarking / maturity matrix is being designed for completion by all forces. CoLP continue to have regular engagement with the National PRAP team, we were fortunate that strand leads attended our launch event and continue to request more detail on our insights and experiences.

### **Launch of new Policing Code of Ethics**

Last month, the College of Policing launched the new Code of Ethics for Policing, this is being led internally by T/Commander Rob Atkin. The new Code reflects the challenges of modern-day policing whilst outlining the professional behaviours that the

public can expect from officers, staff and volunteers. This is subject of a separate detailed report on this agenda.

The nine principles from the 2014 Code of Ethics have been mapped into three principles that are easier to remember and apply:-



To help our officers and staff understand why these changes have been made, a series of guidance tools (including videos) have been circulated to set out what ethical and professional behaviour looks like on a day-to-day basis. These align well with our force values of professionalism, integrity and compassion.

Over the coming months, we are working hard to embed the new Code in all our work and policies, with a working group already established to drive this forward. As part of our Inclusivity Programme, we have an 'ethical dilemmas' module which helps to bring scenarios to life and is an ideal opportunity to test our understanding of the new Code.

## **VI. Forward look**

### **Leadership Programme**

The College of Policing has now launched their 'National Centre for Police Leadership' (NCPL) which aims to support forces to deliver the police leadership programme. This will help to deliver a consistent standard of leadership development for each stage of a career in policing.

As a force, we are working hard on our delivery plans for this new model and in early February are working with our Chief Officer Team to gain a joint understanding of our vision. The first stage of the programme is already being delivered through our new entry routes within CoLP, stage two will be rolled out nationally later this

year. Each programme will be delivered in force but with support and quality assurance by the College to ensure that a core suite of standards and requirements are met and maintained.

'Stage two' of the programme is specifically for first line leaders. This includes Police Constables, Sergeants, Police staff and volunteers who are keen to develop their leadership skills in their current roles, as well as those seeking promotion.

This stage of the programme is designed to equip colleagues with the skills they need in their role. This is whether they're the first officer on scene at a homicide, taking ownership of a crime scene, leading a complex domestic harassment investigation or anything in between. The team are viewing this as a real opportunity to deliver something meaningful to our force; timing is critical in that we are soon expecting results of our recent staff survey, it is important that whatever we deliver takes into account these results as well as the vision from our Chief Officer Team.

### **Staff Survey and Cultural Audit**

Work continues on our cultural audit, we are currently at the design stage and awaiting results from our Staff Survey. We plan to roll out the pilot to 4 teams in March, current activity is focused on arranging briefings for our network leads, union, federation and so on.

The ultimate aim of this audit is to uncover elements of hidden culture which impact on how people feel at work (low level type of behaviors not reaching misconduct). The work involved to deliver this piece is considerable, it is currently being progressed, but two individuals with other competing priorities. Hence careful planning is critical in ensuring progress continues at a steady pace.

### **Visit from College of Policing SLT**

A senior delegation from the College of Policing will be visiting CoLP on 25<sup>th</sup> April 2023 to talk through the work underway so far, future workplans and just to gage general feeling on where we are in this space as a force. We know that the College have highlighted much of our work as 'best' or 'innovative' practice and regularly seek feedback from them as specialists in their field; we want to ensure that this working partnership continues.

### **Inclusive Employers Accreditation**

We previously invited Inclusive Employers to assess our work against their Inclusion Maturity Model back in 2020, where we were rated as 'Compliant'. Aligned to the launch of the refreshed Equity, Diversity & Inclusion Strategy, we will be undergoing a new assessment to independently assess our progress in this area. We have an extensive commitment to get this right with an aim for 2024 to be graded as at least 'Established'.

## Inclusion Maturity Model



The window for submissions to Inclusive Employers opens 6th March this year and closes in May. We are working closely with the organisation to ensure we maximise this opportunity and that our submission showcases all that we do as a force. They are not able to give an exact date for results but will probably be looking at August / September.

## Conclusion

There is a breadth of work going on in this area of business as illustrated in this regular report to your Committee.

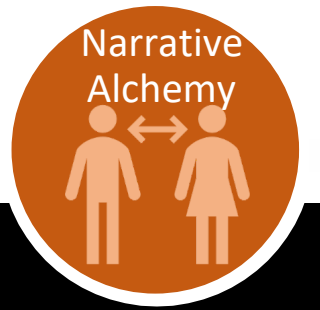
## Appendices

Appendix A- Inclusivity Programme Evaluation

Appendix B- Inclusivity Programme Evaluation Compliance data

Kate MacLeod  
**D/Superintendent**  
**Professionalism and Trust**

# Our People - Inclusivity Programme modules - Oct-Dec 2023



**Interactive Workshop focusing on sexism, misogyny & violence**

4<sup>th</sup> Dec – 2 sessions

In person event

25 attendees

9 staff /16 officers

15 female/10 male

Further sessions to be delivered in Feb 2024

**Focus on... 'BE LADS' campaign with Poppy Murray**

30<sup>th</sup> Nov – 1 session

Virtual event

100 attendees

Further session due early 2024 focusing on the Jewish Community

**Gaining the tools and confidence to call out and challenge inappropriate comments and behaviour**

14<sup>th</sup> Dec – 1 session

In person Event

9 attendees

Further sessions to be delivered in January 2024

**Challenging scenarios to discuss and debate**

15<sup>th</sup> & 17<sup>th</sup> Dec – 2 sessions

In person Event

Further sessions to be delivered in 2024

**Raising awareness & understanding within communities**

6 participants

On going modules that can be undertaken throughout the year

**An insight into young Black people's experiences with police**

26<sup>h</sup> Oct

In person event

36 attendees

Part of new student officer programme

**CoLP Race Action Plan Launch – 20<sup>th</sup> November 2023**  
In person event – 150 attendees

# Narrative Alchemy



**Feedback return 48%**

**100% stated they would recommend this module to others**

## **Positives**

Interactive session on an interesting subject  
Different approach to training makes it more engaging  
Delivery from skilled external partners makes a refreshing change  
Informal, casual style of learning and environment  
Maturity and mutual respect from all involved

## **Core Learning Quotes**

"I am not alone in my experiences."  
"The actual meaning of sexism."  
"The impact on victims when this is not challenged."  
"Technique of retelling the stories of others."  
"Importance of other perspectives."

## **Other comments**

Continue this style of learning with different topics  
Make the sessions longer  
More role plays



## **Steps taken following feedback**

Future sessions arranged for 8<sup>th</sup> February 2024

Increased these from 2 sessions to 3 with an increase in length from 1hr 15mins – 1hrs 45 mins

Feedback debriefed with delivery company and changes made to ensure scripted actor roles are more role play based then individual scenarios

# Focus on



## **BE LADs with Poppy Murray**

Sept session – 143 attendees

Nov session - 80 attendees

12% feedback return with 100% recommending others attend

## **Core Learning Quotes**

“I am conscious as a man of the impact factors that may have caused women anxiety in certain circumstances.”

“We should all be aware of how we might be perceived to others in all types of environments.”

“The level-headed, non-demonising approach, helping all to understand and empathise.”

“I have shared this with my 19year old Daughter for personal safety and probably that I may have more awareness as a father already.”



## **Find your why: a journey from diversity to belonging, by Asif Sadiq Chief of Global Diversity, Equity and Inclusion at Warner Bros**

Sept event - 112 attendees

22% feedback return with 100% recommending to others

## **Main Learning Quotes**

“Value to the position of officer and inspirational to see where it can lead.”

“Importance of believing in your worth and using your life experiences.”

“Relatable to officers and staff as his journey started as an officer in CoLP.”

## **Future sessions arranged for Jan 24**

In person & virtual sessions delivered by Community Security Trust (CST), a charity that protects British Jews from antisemitism and related threats.

Aimed to promote good relations between the Jewish Community and police, providing officers practical tips and tools to effectively combat bias, antisemitism and understand the impacts of these behaviours.

BE LADs – Future session confirmed for March 24

# Active Bystander



**Feedback return 89%**

**100% stated they would recommend this module to others**

## **Positives**

Use of scientific studies  
Group interaction and discussions  
Good quality delivery and trainers  
Encouraged attendee participation

## **Core Learning Quotes**

"The effectiveness of learning to deal with matters directly and timely."

"Importance of early intervention on potentially inappropriate behaviour/comments."

"How I can make a change within the work force."

"Various options for challenging behaviour. Needn't be there and then (when appropriate)."

"How to spot the early signs of bad behaviour."

## **Other comments**

It may be helpful to have a practical element to the training to demonstrate the skills we were taught.

Make this mandatory for all.

## **Steps taken following feedback**

Future sessions arranged for January, February & March 2024

Feedback has been debriefed and delivery style varied accordingly



# Ethical Dilemmas



**Feedback rate 17%**

**100% would recommend to others**

## **Positives**

Group working and discussion  
Time out to reflect on personal decision making  
Variety of attendees made this more interesting

## **Core Learning Quotes**

"Importance of looking at other perspectives when making decisions and communicating rationale."  
"Make less assumptions when dealing with staff issues."  
"Tools to use when faced with complex situations."

## **Other comments**

Delivery style and content, aimed at the right level  
An ice breaker could help at the beginning of the sessions to make attendees more comfortable



## **Steps taken following feedback**

Future sessions arranged for February 2024

Feedback has been debriefed and slight changes may be made to future sessions such as adding an ice breaker and increasing group discussion

# Community Initiative



**This module focuses on the community and encourages officer and staff to be creative and take opportunity to become involved in different communities and feed back into their line management as to what they chose to do, why they chose to do it and share their learning and experience.**

**We have had 6 people choose to take part in this module and have seen a variety of community engagement, predominantly with the younger generations.**

**Below is a summary of activities that took place;**

- **Careers talk at a school for autistic people**
- **Pre-school talk to children on how and when to call 999**
- **Police input to the air cadets**
- **Year 8 careers talk**
- **Fraud/cyber-crime input to children with learning difficulties**



**Steps taken following feedback**

We plan to continue to offer this as a module choice and to encourage participation and share learning, we may share staff experiences via internal communications.

# Mentivity



**26<sup>th</sup> Oct 23 – 35 attendees**

## **Core Learning Quotes**

- “I actively encourage everyone to do this training. The input is really interesting and not what you think it will be. This was the most impactful and useful diversity training I have ever received.”
- “I would highly recommend this session. Opened up healthy discussions around race in policing and gave a lot of insight on people's experiences that would otherwise be difficult to speak about.”
- “I have first-hand policing experience from front line London Boroughs so approached this with a high degree of scepticism. However, I am very pleased to say that I found it both enlightening and challenging to my own held views. This is a very good thing to attend, and I recommend it to all Officers intending to have a long-term career in policing.”



## **Steps taken following feedback**

Future sessions arranged for 2024

These sessions are also part of the new student officer induction programme

# PRAP Launch



**Feedback return 35%**

**100% stated they would recommend this module to others**

## **Positives**

Subject matter experts added value

Interesting and thought-provoking talks

Commitment to the race plan evident through visible senior leadership present

Well organised event, approachable team

Different from past events, more authentic and believable

## **Core Learning Quotes**

"Venue was not overly accessible."

"The event could have been longer."

"Teddy Burton's talk was interesting but too long and detailed for this event."

## **Other comments**

Positive to see a variety of people attend the event

Nice venue and welcoming team

Enjoyed the time to network



## **Steps taken following feedback**

Dr Angela Herbert, as a critical friend is helping to shape internal plan into action through a coaching and advising capacity.

Virtual recording of event can be viewed via the intranet and is mandatory for all.

Priority areas have been identified and further prioritised to ensure effective delivery.



INCLUSIVITY  
PROGRAMME

COMPLIANCE

LAUNCH -  
PRESENT

**725** Focus On Sessions

**698** Inclusivity Launch

**150** PRAP Launch

**95** Mentivity

**95** Active Bystander

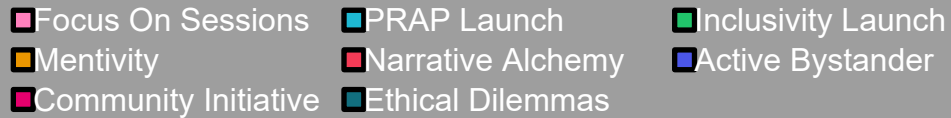
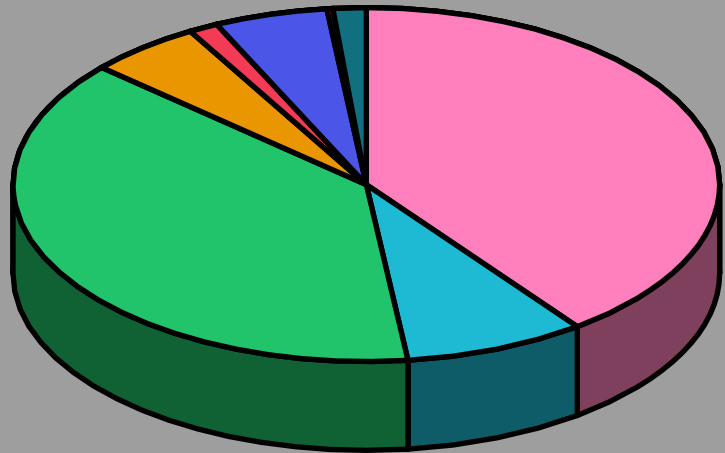
**28** Ethical Dilemmas

**25** Narrative Alchemy

**6** Community Initiative

Number of attendees  
per module

## Percentage of workforce undertaking each module



Focus On Sessions	44.60%
PRAP Launch	9.30%
Inclusivity Launch	43.00%
Mentivity	5.80%
Narrative Alchemy	1.50%
Active Bystander	5.80%
Community Initiative	0.30%
Ethical Dilemmas	1.70%

**1622 employees are eligible to undertake a module, with the mandatory requirement of 2 modules per PDR year.**

**Compliance at this stage will be monitored and recorded on PDRs via individual line managers as well as through registration processes and attendance sheets.**

### Considerations

This data does not account for those employees taking part in multiple modules.

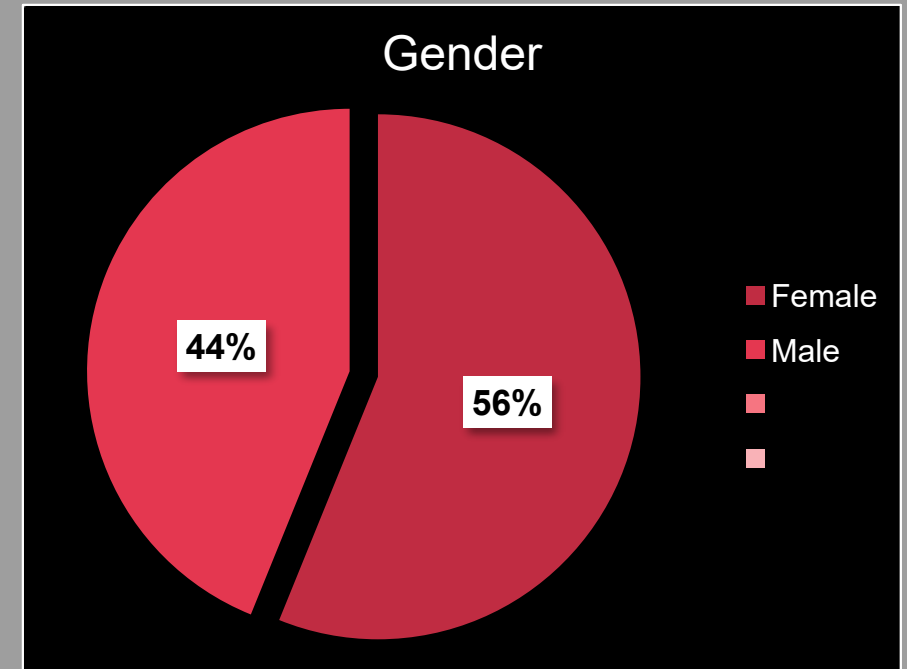
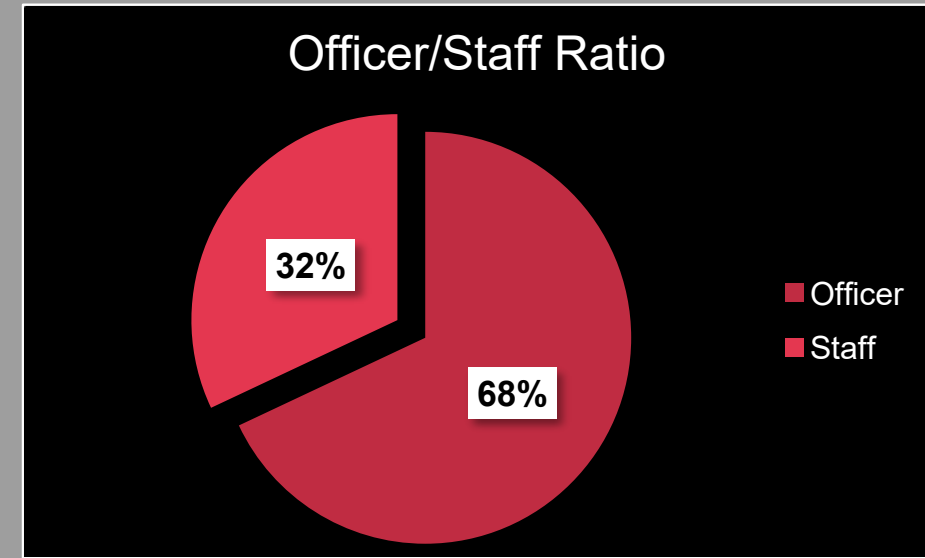
Number of sessions per module vary as to restrictions of attendee numbers.

Focus on sessions, PRAP Launch and Inclusivity Launch are available to view online, however viewer details cannot be recorded hence affecting the uptake data available.

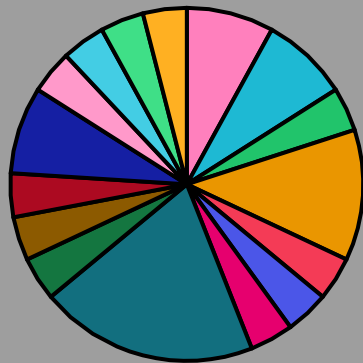
Focus on sessions have the most uptake, and understanding why should consider accessibility, length, number of sessions. Focus on sessions were online, 1 hr long, and have no registration process, hence increasing accessibility. This module also has the greatest number of sessions with no restriction on number of attendees.

Below is a breakdown of data for the Narrative Alchemy Module. This shows a varying aspects of attendee uptake data including departmental uptake, gender ratio and officer/staff ratio.

Limitations on gathering data to produce this for all modules, include resource, registration process, IT systems and attendee numbers.



Departmental Uptake Breakdown of 25 attendees



NFIB	8.00%
ECD	8.00%
HTCU	4.00%
PSD	12%
ART	4%
Major Crime	4%
FCCRAS	4%
NECVCU	20%
LOM	4%
Servator	4%
Local Policing	4%
ICOD	8%
L&D	4%
Support Group	4%
Cyber Griffin	4%
Fraud Ops	4%

- NFIB
- ART
- LOM
- L&D
- ECD
- Major Crime
- Servator
- Support Group
- HTCU
- FCCRAS
- Local Policing
- Cyber Griffin
- PSD
- NECVCU
- ICOD
- Fraud Ops



<b>Committee(s):</b> Professional Standards and Integrity Committee	<b>Dated:</b> 27 February 2024
Police Authority Board	6 March 2024
<b>Subject:</b> College of Policing’s Code of Practice for ethical Policing – ‘The Code of Ethics’ Implementation at City of London Police.	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	1- People are safe and feel safe
<b>Does this proposal require extra revenue and/or capital spending?</b>	N/A
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	N/A
<b>Report of:</b> Commissioner of Police Pol_29-24	<b>For Information</b>
<b>Report author:</b> Rob Atkin MBE, T/Commander	

## Summary

This report outlines the changes to the new Code of Ethics (CoE) for policing which was launched on 24<sup>th</sup> January 2024. The report outlines the opportunities that this presents for the City of London Police (CoLP) in furtherance of its work already being undertaken in relation to supporting equality, diversity & inclusion, officer & staff wellbeing, conduct and professional practice improvements and importantly to support all our staff and volunteers to do the right thing. A well embedded CoE also has significant benefits in improving policing encounters (e.g., stop & search) with members of the public and overall service provision. This builds on the previous CoE which was developed in 2014 and was the first statutory Code of Practice issued by the College, following its establishment as the first professional body for policing. The development of the Code was considered to be an important step in aligning the College to other professional organisations, most of which have codes of ethics. Since 2014 the CoLP has been working to the previous CoE and is well established within Force underpinning policy, process, and ways of working.

The new CoE presents an opportunity for the Force to build on existing work undertaken in relation to ethical policing and decision making and embed across the working practices and culture of the CoLP which will include the development of an Ethics Board.

Appendix 4 details a high-level draft plan on a page of work to embed the code with CoLP Officers, Staff & Volunteers and across the full range of our policies, processes, meeting structures & external scrutiny. There is now an internal CoE Delivery Group which is overseeing the embedding of the new CoE in CoLP.

This work is being led by Rob Atkin, T/Commander.

## Recommendation(s)

Members are asked to:

1. Note the content of this report and the new code of ethics launched by the College of Policing on 24<sup>th</sup> January 2024.
2. Note the three supporting web links to relevant documents (Appendices 1-3) **The Code of Practice for Ethical Policing; Ethical Policing Principles; Guidance for Ethical Behaviour in Policing;** and
3. Note the Code of Practice for Ethical Policing will place the requirement to implement and embed ethical policing onto a statutory footing for Chief officers and will form part of HMICFRS inspections from 2025.

## Main Report

### Background

1. The current code of ethics (CoE) was introduced by the College of Policing in 2014 and was laid before parliament as a code of practice and has a legal status and applies to all police areas of England & Wales as defined by section 1 of the Police act 1996 and relates specifically to all chief officers in the discharge of their functions.
2. The 2014 codes enabled policing to clearly lay out the expectations of every member of the profession and the expectation was that 'every person working in policing would adopt the code as their personal guide to the principles they are expected to uphold and the standards of behaviour they are required to meet'. It was also an important step in aligning policing with other professions, many of which had established codes of ethics. The 2014 codes used the Nolan Principles (the seven principles of public life) as the framework for the code with the additions of fairness and respect also being added, resulting in a CoE with nine policing principles (accountability, fairness, honesty, integrity, leadership, objectivity, openness, respect & selflessness) which were overlaid with the standards of professional behaviour.
3. The previous CoE is well embedded across the City of London Police and is evident in our policies, procedures, and processes. The previous CoE for example is utilised by officers and staff as part of the application of the National Decision-Making Model<sup>1</sup>, it also forms part of assessments for promotion, recruitment and as part of organisational debriefs. The launch of the new CoE presents an opportunity for the CoLP to further build on that work and to further embed ethical decision making and behaviours across the Force.

### Current Position

4. A review of the current CoE was commenced by the College of Policing in 2021 with a series of public consultation events, evidence reviews, best practice in other organisations and arguably most importantly consultation with a wide spectrum of officers, police staff, volunteers, stakeholders & third

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<sup>1</sup> [National decision model | College of Policing](#)

parties. This has resulted in a CoE being launched on 24<sup>th</sup> January 2024 which has been truly shaped by the service and seeks to address issues that were identified with the previous CoE namely:

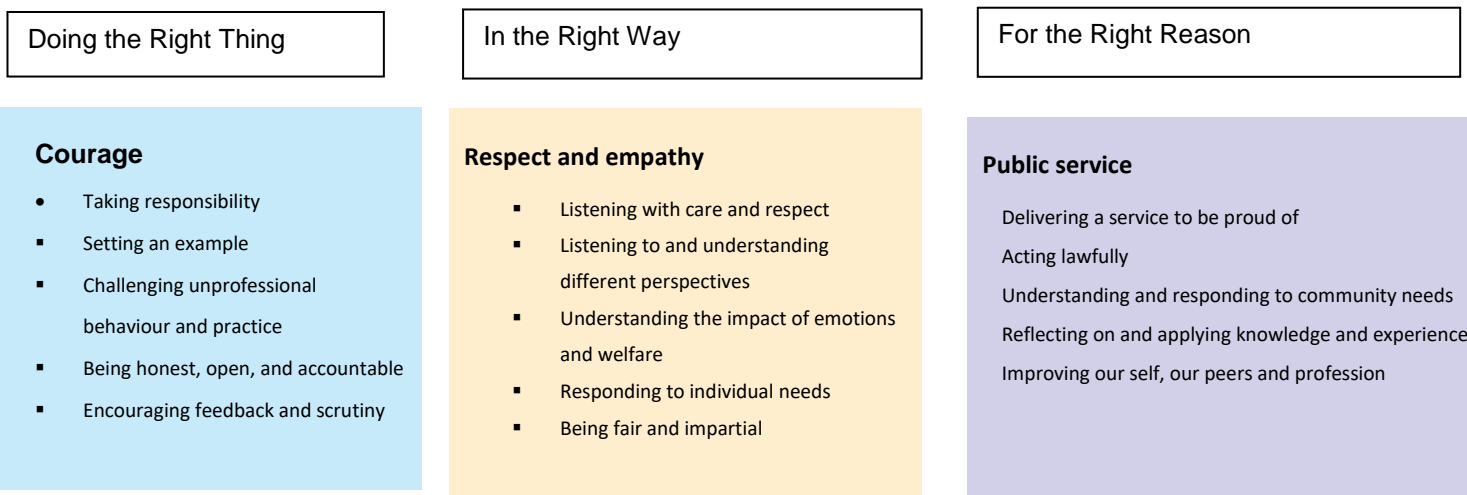
- i) Previous code consisted of 10 chapters under the headings of professional behaviour which came from Police Conduct Regulations. An outcome of this was that the previous CoE was seen as a conduct document and not a document that helps people do the right thing or focus on ethical decision making. There have been cases where Police Officers have wrongly been 'charged' with breaching the Code of Ethics. This has further cemented the view the previous CoE was a conduct document and not one used to guide ethical decisions and help people do the right thing.
- ii) Policing found it difficult to identify with how the seven Nolan principles of public life plus fairness & respect were articulated so there was a disconnect between how staff viewed the CoE and how they made their daily decisions.
- iii) The current CoE was viewed as punitive and reached for when something has gone wrong rather than using the code to guide decision making going forwards. It was not seen as encouraging openness, reflective behaviour and creating a culture of continuous learning.
- iv) Nationally, the CoE was viewed as being applicable to Police Officers rather than Police Staff; many police staff did not view the CoE as relevant to their work even though it was promoted to all.
- v) Chief Officers perceived the previous CoE as being unclear on the specifics of what was required to run an ethical organisation.
- vi) The aim of the new code is to help officers and staff to do the right thing rather than holding them accountable when things go wrong.

5. The new CoE is in three component parts.

- i) **A Code of Practice for Ethical Policing** (Link at Appendix 1) which sets out for Chief Officers "the actions they should carry out to ensure how they should lead an ethical culture and where staff are supported and directed to use the ethical principles in decision making and demonstrate professional behaviour". It is a statutory document, meaning that police Chief Officers have a legal duty to 'have regard' to it when discharging their functions. However, it does not alter the existing legal powers and responsibilities of Chief Officers or alter existing regulations about police (mis)conduct. Instead, it is intended to set out general and specific expectations, as well as information and guidance, on how Chief Officers should work within these frameworks to safeguard and proactively promote ethical policing. While Chief Officers are ultimately accountable, the Code covers the work of 'everyone in policing' – i.e. officers, permanent staff, PCSOs, Special Constables, volunteers, and contractors and contracted service providers.

- It also describes what proactive action is required in response to misconduct and corruption. The code has statutory standing and covers requirement in relation to:
- How to ensure internal and external ethical behaviours
- Public service expectations
- Creating a culture where unprofessional behaviour is challenged.
- Staff welfare is well managed.
- Ensuring openness and candour
- continuing professional development for staff and recognising and responding to misconduct.

ii) **Ethical Policing Principles** (Link at Appendix 2) – this document sets out the new CoE principles namely **Courage, Respect and Empathy and Public Service** and under each principle clearly sets out how officers and staff demonstrate each principle with key behaviours detailed in clearly defined language. A summary is detailed below: The aim of the document is to help Police Officers and Staff to make the right decisions and actions.



iii) **Guidance for Ethical and Professional Behaviour in Policing** (Link at Appendix 3) This document brings the ethical policing principles alive for staff with practical examples and considerations and covers areas such as relationships, social media and wellness and wellbeing in the workplace. The document sets out the expectations for ethical & professional behaviour. The document seeks to promote a positive workplace culture and importantly it uses inclusive and positive language to give clarity about:

- Being a member of the policing profession
- Being open, honest & candid
- Fairness & respect
- Decision making
- Recognising the opportunity to learn

- Challenging unprofessional behaviour
  - When behaviour does not meet expectations
6. **Relevance of the new CoE to misconduct proceedings** It is important to note that the CoE is **not** the standard, it is guidance with the same status as other guidance produced by the College of Policing. The guidance describes how policing professionals should behave, in a way that makes it easy for them to understand those expectations and avoid unprofessional behaviour. Where the CoE is not followed, it **may** provide evidence towards an assessment of misconduct in the same way as other policy or guidance. There are references of CoE in both Home Office Guidance and Police Conduct Regulations- the Home Office will be updating these to ensure clarity on how CoE is used going forward. CoLP Professional Standards Unit should still have 'regard to', 'inform assessments', be 'partly guided by' the CoE in misconduct assessments.
  7. Nationally work has also being undertaken to enhance the understanding of Digital and Data Ethics including biometrics, digital forensics, surveillance & investigatory powers, artificial intelligence, digital public contact development, robotic automation, the use of numerous algorithms, and the ethical procurement of technology. These are currently across a range of national workstreams. To look at ethical issues and dilemmas in these areas it has been agreed that nationally the Biometric Forensics Ethics Group (BFEG) will undertake this function. Work is currently underway to agree how such dilemmas will be referred to this committee from Forces via the National Police Ethics Committee.
  8. There is currently no formulated Ethics Board in CoLP, however, CoLP was previously part of an arrangement with the MPS Ethics Panel which is no longer running. Ethics Boards are a tested method of testing organisational leadership, decision making, policy & practice. Members may wish to note the work which is being commenced to look at best practice nationally and commence a City of London Police Ethics Board which will further embed the new Code of Ethics across the work of the CoLP
  9. A new framework will be provided by the National Portfolio to forces utilising the new Code of Practice to assist us in considering our own ethical structures and how we as a force best enhance the delivery of an ethical organisation. It is likely that in future ethical structures and how the Code of Practice has been implemented in forces will be considered as part of PEEL Inspections from 2025 onwards.

### **Embedding the new Code of Ethics in the City of London Police**

10. There is a significant opportunity for the CoLP to use the new CoE to enhance and inform significant work that is taking place in force already. Importantly the new code helps our people do the **right thing, in the right way, for the right reason** and promotes openness, accountability, learning & improvement. It underpins our Equality, Diversity & Inclusion Strategy currently being refreshed, in that the CoE promotes a respectful and supportive culture in which everyone can thrive. It is our opportunity to engage our people to think about ethical decision making, actions and behaviours but also to further enhance the service we provide the public. For example, the link between

Organisational Justice and Procedural Justice and how ethical decision making can enhance encounters such as stop search, use of force and services to victims and suspects alike. There is also strong evidence to suggest that there are clear links between wellbeing of staff and the making of good ethical decisions so linking this work to our wellbeing work will also have potential benefits for the CoLP.

11. The key here in considering our delivery plan is how we connect the new CoE to all our staff so that ethics become an integral part of their thinking, actions, and behaviours daily. It simply cannot be a document which is launched and only referred to for promotion processes or in our staff's view a misconduct document.
12. The College of Policing are producing a range of material to assist forces in communicating and engaging staff and the public and partners. Internal communications will be using this material to ensure the new CoE is bought to life in CoLP but tailored to our local environment to compliment the work already going on and to link to our own force values ( Appendix 5). The College of Policing view this as an 18-month programme of work to embed the new codes. The launch is also being supported by an online learning program for all staff to complete.
13. Appendix 4 details a high-level draft internal plan of work to embed the code both with all our Police Officers, Staff & Volunteers but also across the full range of our policies, processes, meeting structures & external scrutiny. There is now an internal CoE delivery group, chaired by T/Cdr Rob Atkin, which is overseeing the embedding of the new CoE in CoLP. Delivery of the plan will also be monitored on a quarterly basis at the CoLP Performance Management Group.
14. The launch on 24<sup>th</sup> January has been supported by a series of force communications and staff briefings to introduce the new codes, including a video from the T/Commissioner discussing the new CoE and the importance to individual officers and the force in helping our staff 'do the right thing'. The plan then required Directorate Heads over the coming weeks, having been briefed & equipped with materials leading conversations across their teams on the new CoE and having open conversation in respect of what they mean and practical application. The importance here will be how the CoE becomes part of daily conversations and considerations across the CoLP for example in debriefing and PDR conversations. This is supported by work that Professionalism and Trust are delivering in relation to 'ethical conversations' – an opportunity where staff can discuss ethical issues and their response.
15. During our launch, we have referenced our current force values and how they align to the new CoE for example empathy naturally aligns with compassion, integrity requires courage and professionalism has a direct link to public service. This will form part of the discussions across the CoLP with staff in providing practical examples of how the new codes can be demonstrated on and off duty.
16. The delivery plan will also see the new CoE being integrated into all our in-force training and importantly how the changes affect for example National Decision-Making model considerations. This will be a specific workstream to

map all our training, to refresh and review content to ensure the new CoE runs throughout. Likewise, our HR processes will be updated to reflect the new code whether that is recruitment, assessment, promotions framework or PDR. HR processes such as PDR reflections and promotion processes ensure our staff have a practical opportunity to demonstrate how they are using the CoE in their daily work.

17. Other key areas of policy and practice that will need to ensure the CoE is reflected in decision making is Professional Standards. Staff training and policy changes will need to embed the new codes to ensure that PSD have regard to', 'inform assessments', and be 'partly guided by' the CoE in misconduct assessments.
18. An external communications plan has also been created to compliment the national media that will be completed by the College of Policing on launch date. Going forward examples of CoE good practice offer an opportunity to inform both our internal and external good news content.
19. In many forces Ethics Boards are now a tried and tested method of testing organisational leadership, decision-making, policy, and practice. Owing to the varied nature of how ethics boards are run in forces, the NPCC portfolio has instigated work, led by ACC Osman Khan, to review national practice, research and academic findings to formalise some good practice guidance for forces to consider.
20. Recognising that cultural change and the improvements that we would want to see both internally and indeed externally on public encounters and service delivery will not be solely delivered by a new code of ethics. However, if the new code is viewed as the foundation of all that we do in force and intertwined with current and future change, policy, leadership & continual professional development the evidence suggests that we can achieve a significant positive shift in both internal feeling of fairness and belonging but also improvements in service provision and interactions with the public.
21. From 2025 HMICFRS inspections will examine how the CoE has been embedded in force and will form an integral part of the force inspection process.

## **Conclusion**

22. The launch of a new CoE presents a significant opportunity for the CoLP to further enhance our workplace culture, leadership, and well-being for all staff. The new CoE compliments work already underway under our refreshed equality, diversity, and inclusion strategy. It presents an opportunity for staff conversations in respect of ethical decision making and a forward-looking set of principles and practical guidance to assist our staff in doing the right things. It is an opportunity to reaffirm the ethical behaviours that all staff are expected to consider as part of their daily duties. The importance of leadership across all areas of the force in embedding the new CoE and having ongoing conversations with staff will be essential in embedding behavioural and cultural change in the long term. Members will be updated in respect of our progress as we work to fully embed the CoE.

Rob Atkin  
**T/Commander Ops and Security**  
**City of London Polce**

## **Appendices**

**Appendix 1** - Codes of Practice for ethical policing

[Code of Practice for Ethical Policing | College of Policing](#)

**Appendix 2** – Ethical policing principles

[Ethical policing principles | College of Policing](#)

**Appendix 3-** Guidance on ethical and professional behaviour in policing

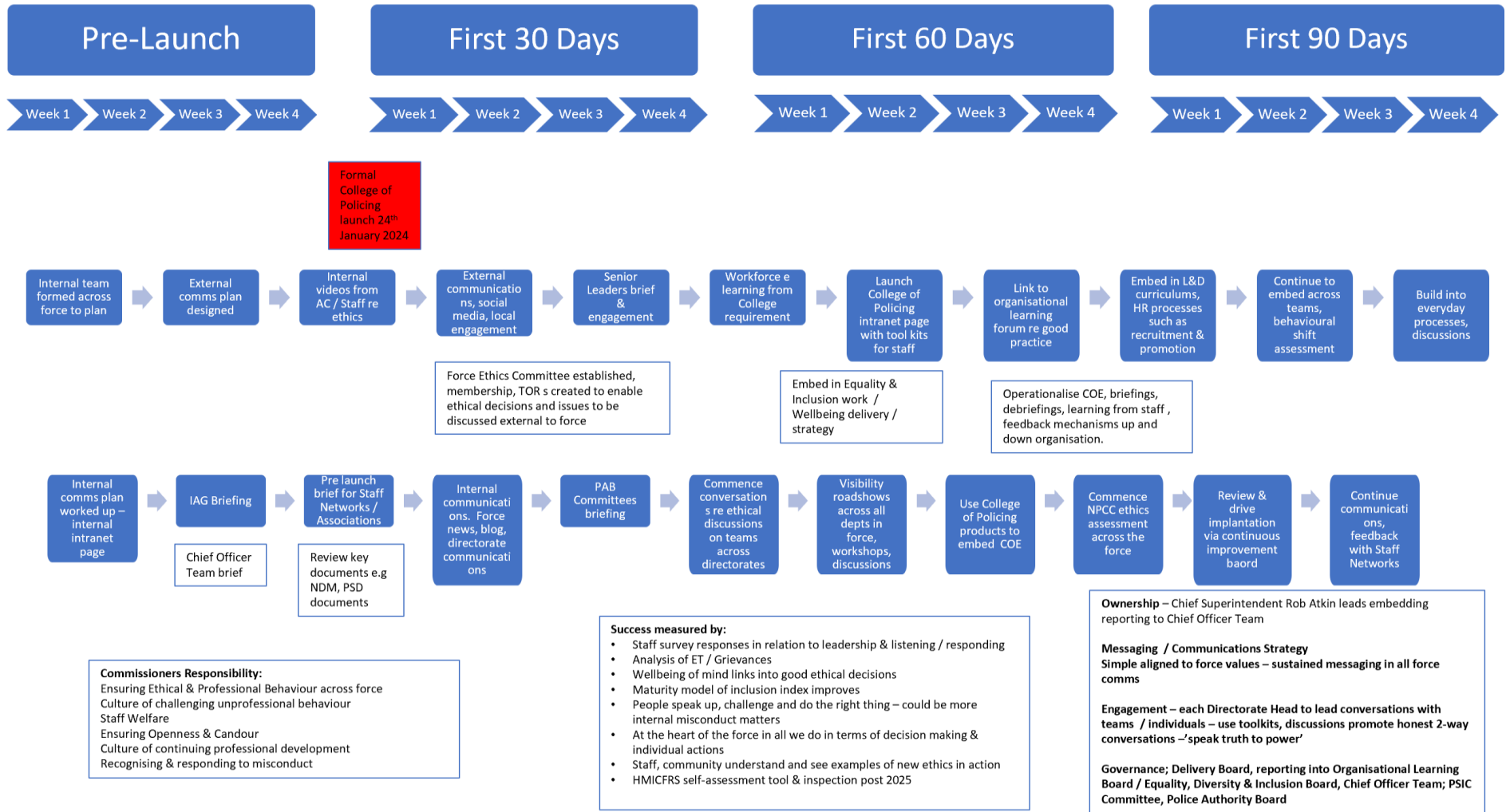
[Guidance for ethical and professional behaviour in policing | College of Policing](#)

**Appendix 4** – Overview of delivery plan

**Appendix 5** – example of internal posters x2



# Appendix 4- Overview of Delivery Plan



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# Ethical policing principles

We will use the ethical policing principles to help us make and reflect on our professional decisions. As policing professionals, we commit to the following.

## Courage

Making, communicating and being accountable for decisions, and standing against anything that could bring our profession into disrepute.



## Respect and empathy

Encouraging, listening to and understanding the views of others, and seeking to recognise and respond to the physical, mental and emotional challenges that we and other people may face.



## Public service

Working in the public interest, fostering public trust and confidence, and taking pride in providing an excellent service to the public.



**Doing the right things, in the right way, for the right reasons**





# Code of Ethics

The Code of Ethics sits at the heart of everything we do. It sets out how we work together in policing and with the public to keep people safe.

The Code of Ethics is inclusive and supports everyone in policing. It has two parts, both of which are non-statutory.

## Ethical policing principles

These principles are a series of guiding statements that should be used to help people in policing do the right things, in the right way, for the right reasons.

## Guidance for ethical and professional behaviour in policing

The guidance describes how policing professionals should behave. It provides practical advice on areas of policing that are important to maintaining public trust and legitimacy.

## Code of Practice for Ethical Policing

The Code of Ethics is supported by a statutory Code of Practice for Ethical Policing. It includes actions that chief officers should take to support people in their force to use the ethical policing principles and to demonstrate professional behaviour.

**Code of Ethics**  
**Know your code**



# Courage



We show courage by:

- ◆ taking responsibility
- ◆ setting an example
- ◆ challenging unprofessional behaviour and practice
- ◆ being honest, open and accountable
- ◆ encouraging feedback and scrutiny

**Code of Ethics**



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<b>Committee(s)</b>	<b>Dated:</b>
Police Authority Board Streets & Walkways Sub Committee Policy & Resources Committee	6 March 2024 19 March 2024 11 April 2024
<b>Subject:</b> Anti-Terrorism Traffic Regulation Order	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	<b>1</b>
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>No</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>N/A</b>
<b>Report of:</b> Executive Director, Environment Department	<b>For Information</b>
<b>Report author:</b> Ian Hughes, City Operations Director	

## Summary

The City’s permanent Anti-Terrorism Traffic Regulation Order (ATTRO) authorises the City Police to potentially control the movement of pedestrians and vehicles on City streets for counter terrorism purposes and was originally requested as part of a package of measures aimed at both improving the security of people in crowded places & preventing damage to buildings from a potential terrorist attack.

Members approved the ATTRO in 2016 on the basis that the City Corporation’s area was particularly vulnerable to terrorism due to its highly dense nature and the concentration of high profile, historic, prestigious and financial targets that can be found throughout the Square Mile. Matters since would suggest this assessment has not changed, albeit the use of the ATTRO has been limited to a small number of high-profile special events.

From a City Police perspective, retaining the permanent ATTRO remains important because it affords them the ability to react quickly, if the intelligence necessitates it, to protect the public. For the City Corporation, having a permanent ATTRO allows it to be implemented for specific requests in a more timely manner where speed of response may be important.

The ATTRO was made as a permanent traffic order but subsequently Members requested that in addition to annual reports on its usage, the continuing need for the ATTRO to remain in place would be reviewed every three years. Last year’s report agreed the next three year cycle, making this year’s report just For Information.

## Recommendation(s)

Members are to note the usage of the ATTRO during 2023, and that it will remain in place until the next review in two years’ time.

## **Main Report**

### **Background**

1. In September and October 2016, the Planning & Transportation Committee (for decision), the Police Committee (for information) and the Policy & Resources Committee (for decision) discussed and agreed to the creation of an Anti-Terrorism Traffic Regulation Order (ATTRO) in the City Corporation area.
2. This was in response to a request from the Commissioner of the City Police in July 2015 to introduce such an order and followed a statutory public consultation.
3. The Commissioner's request was informed by advice received from his counter-terrorism security advisors, including the Centre for the Protection of National Infrastructure (now the National Protective Security Authority). The advice related to the whole administrative area of the City and was in the context of the potential impact of terrorism due to the City's intensely crowded nature and its role as a high-profile world centre of economic activity.
4. The ATTRO is a counter terrorism measure pursuant to the provisions of the Civil Contingencies Act 2004, which allows traffic orders to be written by the Traffic Authority under s6, s22C and s22D of the Road Traffic Regulation Act 1984. These orders can only be made on the recommendation of the Commissioner of Police and are for the purposes of:
  - Avoiding or reducing the likelihood of, or danger connected with, terrorism, or;
  - Preventing or reducing damage connected with terrorism.
5. On the basis of a security assessment or an intelligence threat, the ATTRO gives a City Police Inspector or above the discretion to restrict traffic and / or pedestrians to all or part of any street in the City. That discretion must be exercised in accordance with an agreed protocol so that any interference is proportionate and that such restrictions are in place for the minimum extent and time necessary.
6. The Commissioner requested the ATTRO be put in place on a permanent basis, but that its use be contingent on it only being used as a proportional counter terrorism response to the needs of an event, incident or item of intelligence. Transport for London also agreed to allow the City Corporation to include their streets within the Square Mile as part of the ATTRO area.
7. The permanent ATTRO allows the controls to be activated at any time, albeit in accordance with an agreed protocol that reflects the statutory requirements for making such an order. Nevertheless, its permanent nature enables quicker activation of security measures to meet operational requirements given the unpredictability of the current terrorist threat.



8. Members agreed to making the ATTRO on two key conditions, namely that an annual review be presented to Members, and as part of that review, there should be confirmation that the ATTRO had been used in a proportionate way.

### **Current Position (Process)**

9. The protocol established for using the ATTRO allowed for two main types of scenario. The first of these was for intelligence-based police led urgent situations, however, since it's introduction the permanent City ATTRO has yet to be used to implement controls resulting from advance intelligence.
10. The second scenario was in relation to pre-planned special events where the ATTRO could be used to supplement the City Corporation and TfL's existing event planning process. Such events typically have a separate pre-advertised temporary traffic regulation order (TTRO) granted to the organiser to close roads just to facilitate the event, but if deemed appropriate, the ATTRO could be used to authorise additional protective security measures, particularly in response to emerging information regarding the terrorist risk to that event.
11. These could include the control of pedestrian movements which would not typically form part of the standard event TTRO, and / or additional road closures that might be deemed appropriate at short notice.
12. Individual requests to implement measures under the ATTRO are carefully considered and only agreed (at Town Clerk level) if they are proportionate, specific to that event and take into account the balance of other legislative rights and powers.
13. The operational protocol to oversee how the ATTRO is triggered and operated remains subject to review between the City Corporation, City Police and TfL under 'Business as Usual' protocols to ensure it remains fit for purpose. In addition, although the authority to implement the ATTRO has been delegated to the Town Clerk, the Chairmen of your respective Committees are made aware when requests are made and this delegation is used.

### **ATTRO Requests**

14. In the six years between 2016 and 2022, the City Police Commissioner requested use of the ATTRO on 11 separate occasions, all in relation to a particular special event. Five of those requests involved the annual New Year's Eve celebrations as part of the Metropolitan Police-led operation across Central London. The other six were in either 2017 or 2022 and related to:
  - The funeral of PC Keith Palmer at Southwark Cathedral (2017)
  - The IAAF Marathon (2017)
  - The Lord Mayor's Show & Fireworks (2017)
  - The Grenfell Tower Memorial Service at St Paul's Cathedral (2017)
  - Her Majesty the Queen's Platinum Jubilee Service at St Paul's Cathedral (2022)

- Events related to the passing of Her Majesty Queen Elisabeth II and the accession of His Majesty King Charles III (2022)

15. In 2023, two further requests were made and approved in relation to events, namely the London Marathon and (again) New Year's Eve. Both were made alongside ATTRO requests from the Metropolitan Police to other Highway Authorities as part of a pan-London policing operation.
16. Post-event feedback would suggest the additional powers contained in the ATTRO were used sparingly, but where used, they proved helpful in ensuring the mitigation of terrorism risk. There was no noticeable or negative impact on the general public and none of their uses exceeded 48 hours, which would have otherwise triggered a review by the Town Clerk & Commissioner as per the standing protocol.

### **Corporate & Strategic Implications**

17. Counter Terrorism is graded as a tier one threat against our country as per the National Strategic Policing Requirements set by the Home Office. Nationally and locally, there is an appropriately strong expectation that the threat of terrorism is met by an equally appropriate and proportionate response by the police and their partners.
18. The Government's Contest Strategy aims to reduce the risk to the UK and its interests overseas from terrorism, so people can go about their daily lives freely and with confidence. The City of London Police, part of the London counter terrorism region, supports the Contest Strategy through the four P's approach of Pursue, Prevent, Protect and Prepare. Protective Security as a theme, and therefore the ATTRO, fits firmly under Protect element of the Government's Contest Strategy.
19. One of the three operational priorities of the City of London Police's Policing Plan is 'to keep those who live, work, and visit the City safe and feeling safe.' This includes having all the tools and resource available to rapidly mitigate risk and to protect the public.
20. The City of London's historical, cultural and economic importance means it will always be an attractive target for those who are intent on causing high profile disruption. By continuing to protect the City of London from terrorism we will continue to protect the UK's interests as a whole. In terms of prevention, the City of London Police plan states 'we will enhance and develop our protective security tactics to protect the City from terrorist attack, testing and exercising with partners to improve our response.'
21. The City of London Local Plan 2015 aims to ensure that the City remains a safe place to live, work and visit. Core Strategic Policy CS3 makes specific provision for implementing measures to enhance the collective security of the City against terrorist threats. It seeks to apply those measures to broad areas, including the City as a whole, encouraging the development of area-based approaches to

implementing security measures. The Local Plan is now under review but is likely to continue that approach.

22. The risk of terrorist attack remains at the top of the current Corporate Strategic Risk Register because of the City's concentration of high profile, historic, prestigious and financial targets. In addition, the City's Corporate Plan 2018-2023 reiterates the key aims of ensuring people are safe & feel safe and that we protect the users of our buildings, streets & public spaces.
23. Otherwise, the legal implications on the use of the ATTRO remain unchanged from the original 2016 report and are repeated in Appendix 1 for reference.

### **Risk Implications**

24. Although the risk of further terrorist attacks in the Square Mile cannot be eliminated, the potential availability of the ATTRO to the City Police forms part of the measures available to help mitigate that risk.

### **Legal & Equalities Implications**

25. See Appendix 1.

### **Financial, Resource & Climate Implications**

26. None

### **Conclusion**

27. Given the Square Mile's exceptional environment, its 'attractiveness' as a terrorist target has not changed. The evidence would suggest the use of the ATTRO is carefully considered and is used proportionately, balancing public interest against individual rights. Feedback does not suggest any noticeable or negative impact on the general public and a significant but appropriate degree of challenge is made by the City Corporation to the requests from the Commissioner to use it.

### **Appendices**

#### **Appendix 1 - ATTRO Legal Considerations**

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## Appendix 1 - ATTRO Legal Considerations

1. Statutory power to make the ATTRO – Sections 6, 22C and 22D of the Road Traffic Regulation Act 1984 (as amended by the Civil Contingencies Act 2004) enables traffic orders to be put in place by the traffic authority for the purposes of avoiding or reducing the likelihood of danger connected with terrorism, or preventing or reducing damage connected with terrorism.
2. Statutory duties of traffic authority - As traffic and highway authority, the City Corporation has the duty to secure the expeditious, convenient and safe movement of traffic (having regard to the effect on amenities) (S122 Road Traffic Regulation Act 1984) and the duty to secure the efficient use of the road network avoiding congestion and disruption (S16 Traffic Management Act 2004). The Schedule to the ATTRO sets out requirements aimed at meeting these duties by ensuring that any restrictions will be the minimum necessary to remove or reduce the danger and are consistent with the statutory requirements for making such Orders. In implementing the ATTRO the traffic impacts of restricting or prohibiting traffic to roads within the City, including, potentially, pedestrian traffic, should be considered. In the event of a threat, the disruption to traffic flow would also have to be weighed against the threat of more severe disruption and greater risk being caused due to failure to prevent an incident.
3. Further controls - The Schedule to the draft ATTRO requires that in most cases at least seven days' notice of any restrictions must be given to persons likely to be affected (unless this is not possible due to urgency or where the giving of notice might itself undermine the reason for activating the ATTRO), and notice must also in any event be given to the City, TfL and other affected traffic authorities. The requirement for notice is intended to mitigate adverse traffic impacts by enabling alternative transport arrangements to be put in place.
4. Human Rights and Proportionality - In considering the request for the ATTRO, there is a duty to act in accordance with the European Convention on Human Rights. In relation to possible restriction of access to property, any interference with Article 1 rights to enjoyment of property must be justified. Interference may be regarded as justified where it is lawful, pursues a legitimate purpose, is not discriminatory, and is necessary. It must also strike a fair balance between the public interest and private rights affected (i.e. be proportionate). It is considered that the public interest in being protected by the existence and operation of the ATTRO can outweigh interference with private rights which is likely to occur when restrictions are in operation. The scope of restrictions must be proportionate and should only last until the likelihood of danger or damage is removed or reduced sufficiently in the judgment of a senior police officer. The Schedule to the ATTRO sets out arrangements (further expanded in the Protocol) for ensuring that any interference is proportionate. Given the risks to life and property which could arise if an incident occurred, and the opportunity provided by the ATTRO to remove or reduce the threat of and/or impacts of incidents, it is considered that the ATTRO can be justified and any resulting interference legitimate.

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