



City of London Police Authority Board

Date: WEDNESDAY, 5 JUNE 2024
Time: 11.00 am
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members:

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

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

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA
Part 1 - Public Agenda

1. **APOLOGIES**

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

3. **MINUTES**

To approve the draft public minutes and non-public summary of the Police Authority Board meeting on 8 May 2024.

For Decision
(Pages 7 - 18)

4. **OUTSTANDING REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 19 - 20)

5. **CHAIR'S PUBLIC UPDATE**

The Chair to be heard.

For Information
(Pages 21 - 22)

6. **COMMISSIONER'S UPDATE**

Report of the Commissioner.

For Information
(Pages 23 - 26)

7. **FCCRAS UPDATE**

Chief officer to be heard.

For Information
(Verbal Report)

8. **ANNUAL REVIEW OF POLICE COMPLAINTS ACTIVITY - 2022/23 ***

Report of the Town Clerk.

For Information
(Pages 27 - 48)

9. **2023/24 REVENUE AND CAPITAL BUDGET OUTTURN- FINAL**
Report of the Commissioner.

For Information
(Pages 49 - 84)
10. **ANGIOLINI INQUIRY- PART 1- CITY OF LONDON POLICE UPDATE ***
Report of the Commissioner.

For Information
(Pages 85 - 102)
11. **EQUITY, DIVERSITY, INCLUSIVITY (EDI) UPDATE ***
Report of the Commissioner.

For Information
(Pages 103 - 136)
12. **BUSINESS RATE PREMIUM ***
Report of the Chamberlain.

For Information
(Pages 137 - 140)
13. **RESPONSIBLE PROCUREMENT IMPACT REPORT FY23-24 ***
Report of the Chamberlain.

For Information
(Pages 141 - 164)
14. **CITY OF LONDON INDEPENDENT CUSTODY VISITING SCHEME ***
Report of the Town Clerk.

For Information
(Pages 165 - 186)
15. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**
16. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
17. **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

18. **NON-PUBLIC MINUTES**

To approve the draft non-public minutes of the Police Authority Board meeting held on 8 May 2024.

For Decision
(Pages 187 - 190)

19. **NON-PUBLIC OUTSTANDING REFERENCES**

Joint Report of the Town Clerk and Commissioner.

For Information
(Pages 191 - 192)

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

The Chair to be heard.

For Information
(Verbal Report)

21. **COMMISSIONER'S UPDATES**

The Commissioner & Chief Officers to be heard.

For Information
(Verbal Report)

22. **FCCRAS REVISED BRANDING UPDATE**

Report of the Commissioner.

For Information
(Pages 193 - 236)

23. **FFCRAS BUSINESS CASE**

Report of the Commissioner.

For Information
(Pages 237 - 258)

24. **EASTERN BASE PROGRESS REPORT**

Report of the City Surveyor.

For Information
(Pages 259 - 284)

25. **CITY OF LONDON POLICE CYBER SECURITY POSTURE ***

Report of the Commissioner.

For Information
(Pages 285 - 316)

26. **CITY OF LONDON POLICE PROJECT CLOSURES**

Report of the Commissioner.

For Information
(Pages 317 - 324)

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

Report of the Commissioner.

For Information
(Pages 325 - 392)

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

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

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CITY OF LONDON POLICE AUTHORITY BOARD

Wednesday, 8 May 2024

Minutes of the meeting of the City of London Police Authority Board
held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Wednesday, 8
May 2024 at 11.00 am

Present

Members:

Tijs Broeke (Chair)
Deputy James Thomson (Deputy Chair)
Nicholas Bensted-Smith
Helen Fentimen OBE
Jason Groves
Deputy Madush Gupta
Alderman Timothy Hailes
Deborah Oliver
Graham Packham
Deputy Dawn Wright
Melissa Collett (External Member)
Michael Mitchell (External Member)

Officers:

Greg Moore	- Town Clerk's Department
Richard Riley CBE	- Town Clerk's Department
Polly Dunn	- Town Clerk's Department
June Haynes	- Town Clerk's Department
Oliver Bolton	- Town Clerk's Department
Caroline Al-Bayerti	- Chamberlain's Department
Zakki Ghauri	- Chamberlain's Department
Frank Marchione	- Comptroller and City Solicitor's Department

City of London Police:

Pete O'Doherty	- City of London Police
Paul Betts	- City of London Police
Nik Adams	- City of London Police
Umer Khan	- City of London Police
Alix Newbold	- City of London Police
Alistair Cook	- City of London Police
Chris Bell	- City of London Police
Hayley Williams	- City of London Police
Gary Brailsford-Hart	- City of London Police

1. APOLOGIES

The Board approved that Alderman Timothy Hailes take the chair for those items of business before the election of the Chair.

Apologies were received from Sir Craig Mackey.

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

There were no declarations.

3. ORDER OF THE COURT OF COMMON COUNCIL

The Board received the Order of the Court of Common Council appointing the Board and setting its terms of reference.

RESOLVED- That the Order of the Court of Common Council be received.

4. ELECTION OF CHAIR

The Board proceeded to elect a Chair in accordance with Standing Order No. 29. Tijs Broeke being the only Member expressing a willingness to serve was duly elected as Chair for the year ensuing and took the Chair.

The Chair thanked the Board for this appointment and set out his three priorities as listed below.

- To ensure the introduction of the replacement service for Action Fraud;
- that the Police Authority Board make a reality of the priority of putting victims at the heart of everything we do; and
- the work to make the City of London Police the most inclusive police service in the country.

The Chair noted that these priorities are vital components in keeping the public, the City, and the nation safe.

The Chair expressed confidence that building on the approach the previous Chair has championed over the past four years, the City can be an exemplar of how to ensure that the public receives an efficient and effective police service.

RESOLVED- That Tijs Broeke be elected as Chair of the Police Authority Board for the year ensuing.

VOTE OF THANKS TO OUTGOING CHAIRMAN

The Chair and the Senior Commoner commended the immediate past Chair, Deputy James Thomson for his contribution to the work of the Board and these sentiments were echoed by Board Members. A vote of thanks and appreciation for the immediate past Chair's contribution to the work of the Board during his tenure as Chair was moved, and it was,

RESOLVED UNANIMOUSLY:

That it was the sincere wish of the Members of the Police Authority Board to place on record their deep appreciation and thanks to

DEPUTY JAMES THOMSON

For the unparalleled dedication and commitment shown in his service as Chair of the City of London Police Authority Board over the last four eventful years.

James skilfully led the Police Authority through many occasions of national significance – from the challenges of operating under Covid to the death and funeral of Her Late Majesty Queen Elizabeth II (Operation London Bridge) and through to the Proclamation of His Majesty King Charles III and his Coronation.

However, James's commitment to policing in the Square Mile long predates his terms as Deputy Chair and Chair of the Board, as he joined the City of London Police Special Constabulary in September 2002, rising to Special Inspector in 2007 – which saw him awarded Special Constable of the Year in the City Police's own annual awards.

James also oversaw the retirement of the previous Commissioner, Ian Dyson QPM and the recruitment of Angela McLaren as the 16th Commissioner of the City of London Police and first woman to hold the post.

This was part of a wider change to the senior leadership team, with whom James built a strong and effective relationship built on respect, candour and trust. This grounding helped move the force to one of greater sustainable financial strength, supported by the creation of a shared Chief Financial Officer of the City Police and Treasurer of the Authority Board. Coupled with securing successive increases in Business Rate Premium, Thus, James leaves the City of London Police with its strongest finances for many years and officer and staff numbers at the highest for over a decade. James also pushed for similar strengthening of the Police Authority Team, which saw its growth and recruitment of its first dedicated director. James further enhanced the expertise and experience of the Board itself by strengthening the calibre of External Members recruited to its ranks.

James has long been a tireless champion of inclusion and his term as Chair saw no let-up in these endeavours. He publicly committed to make the City of London Police the most inclusive police service in the country, established a highly successful annual Stephen Lawrence Day event in the City – attended by young people from across the capital – ensured that the Police became White Ribbon Accredited in 2023 and himself a White Ribbon Ambassador.

James has shown himself to be an energetic ambassador of the City of London Police's national roles on business crime, fraud, economic and cyber crime – recognising the impact on victims and the importance for the City's competitiveness and the nation's economic security. Particularly on the latter, using his position on the Board of the Association of Police and Crime Commissioners and Deputy leadership of their Economic and Cyber Crime portfolio to good effect, raising the profile of fraud with local Police and Crime Commissioners ensuring inclusion in all local Police and Crime Plans and supported by advocating for the inclusion of fraud in the Strategic Policing Requirement. This was in parallel to multiple successful efforts campaigning for legislative changes to enhance the wider system response to fraud and economic crime, as well as leading the efforts for a call to fraud disclosure reform, which saw him effectively using his ties to the Serious Fraud Office, as a non-Executive Director on their Board. James also advocated for, and helped secure, £150 million to fund the replacement service to Action Fraud. He also supported the establishment of the National Cyber Resilience Centre, becoming its first Chair, in support of tackling SME cyber resilience.

His efforts were not restricted to championing the City of London Police's national roles, as he supported local policing initiatives to improve the safety of those living, working and visiting the Square Mile, including a safe night economy (Operation Reframe), tackling violence against women and girls, the new Cycle Team and strengthened Neighbourhood Policing – together helping ensure that the City remains the safest business district in the world.

Throughout his term on the Board, James promoted the City Police's Estates Programme, ensuring that planning permissions at Salisbury Square and Middlesex Street were secured and formally marked by James with the laying of the foundation stone for the new City of London Police Headquarters.

James advocated passionately for raising the profile of the City Police internally and externally through broad stakeholder engagement and on social media and regularly seen supporting the frontline.

FINALLY, THE BOARD WISHES TO PLACE ON RECORD its sincere thanks to James for his commitment to the Authority's cause and for championing the City of London Police in all areas of his work in the Corporation. His colleagues wish him and his family the very best for the future.

The Deputy Chair thanked the Chair, the Police Authority Team, the City of London Police Senior Leadership Team and the Members of the Police Authority Board for their support during this term.

5. ELECTION OF DEPUTY CHAIR

The Board proceeded to elect a Deputy Chair in accordance with Standing Order No. 30. Deputy James Thomson being the only Member expressing a willingness to serve was duly elected as Deputy Chair for the year ensuing.

The Deputy Chair thanked Members for their support and commented on his intention to support the Chair in his priorities as well as working with officers from both the City of London Corporation and Police.

RESOLVED- That Deputy James Thomson be elected as the Deputy Chair of the Police Authority Board for the year ensuing.

6. MINUTES

RESOLVED – That the minutes of the meeting held on 6 March 2024 were approved as an accurate record.

7. MINUTES FROM RECENT COMMITTEES

a. RESOURCE RISK AND ESTATES COMMITTEE 5 FEBRUARY 2024

RESOLVED, - that the public minutes and non-public summary of the Resource Risk and Estates Committee on 5 February 2024 be noted.

b. ECONOMIC AND CYBER CRIME COMMITTEE 19 FEBRUARY 2024

RESOLVED, - that the public minutes and non-public summary of the Economic and Cyber Crime Committee on 19 February 2024 be noted.

c. STRATEGIC PLANNING AND PERFORMANCE COMMITTEE 22 FEBRUARY 2024

RESOLVED, - that the public minutes and non-public summary of the Strategic Planning and Performance Committee on 22 February 2024 be noted.

d. PROFESSIONAL STANDARDS AND INTEGRITY COMMITTEE 27 FEBRUARY 2024

RESOLVED, - that the public minutes and non-public summary of the Professional Standards and Integrity Committee on 27 February 2024 be noted.

8. CITY OF LONDON POLICE AUTHORITY BOARD'S COMMITTEES AND APPOINTMENTS

The Board considered a report of the Town Clerk relating to its Committees and Appointments. The Board discussed the frequency of Board and Committee meetings and agreed to reduce the number of Police Authority Board meetings to a minimum of 6 annually.

The Board approved the Chair, Deputy Chair, Member, External Member and Committee Member role descriptions at Appendix 3.

The Board considered the appointment of each of the Committees. With regard to the Chair and Deputy Chair positions of the Police Authority Board subcommittees, a Member queried the transparency of the appointment process. The Chair outlined that under Standing Order 27(2) the Chair and Deputy Chair of a Sub-Committee shall be the Chair and Deputy Chair of the appointing Committee, or their

nominee(s), subject to the support of the wider Committee Membership. The Chair resolved to raise the concerns noted around the process with the Chair of the Policy and Resources Committee.

Economic & Cyber Crime Committee (ECCC)

- a) Members noted the inclusion of the appointment of the Chairman of Policy & Resources Committee or their nominee to the ECCC; The Board agreed to propose a nominee would take the place of the Policy and Resources Chair.
- b) Members noted the responsibility of Policy & Resources Committee to appoint a further one of its Members to the ECCC;
- c) Members agreed that Deputy James Thomson be appointed Chair for 2024/25; and Tijs Broeke be appointed Deputy Chair for 2024/25.
- d) Members approved the terms of reference and composition as proposed in Appendix 2;
- e) Members agreed that, in addition to the Police Authority Board's Chair and Deputy Chair, Graham Packham, Alderman Professor Emma Edhem, Madush Gupta, Dawn Wright, Nicholas Bensted-Smith, Sir Craig Mackey and Jason Groves be appointed for 2024/25.
- f) Members noted that the co-opted Court of Common Council places on the Committee were to be advertised after the meeting and appointed at the next meeting of the Board.

Strategic Planning & Performance Committee (SPPC)

- a) Members approved the terms of reference as proposed in Appendix 2.
- b) Members agreed that Jason Groves be appointed Chair for 2024/25; and Tijs Broeke be appointed Deputy Chair for 2024/25.
- c) Members agreed that, in addition to the Police Authority Board's Chair and Deputy Chair, Helen Fentimen, Jason Groves, Andrew Lentin, Deborah Oliver, Melissa Collett and Michael Mitchell be appointed for 2024/25;
- d) Members noted that the co-opted Court of Common Council places on the Committee were to be advertised after the meeting and appointed the next meeting of the Board.

Resource, Risk & Estates Committee (RREC)

- a) Members approved the terms of reference as proposed in Appendix 2
- b) Members agreed that Alderman Timothy Hailes be appointed Chair for 2024/25; and Tijs Broeke be appointed Deputy Chair for 2024/25.
- c) Members agreed that, in addition to the Police Authority Board's Chair and Deputy Chair, Alderman Timothy Hailes, Andrew Lentin, Helen Fentimen, Deborah Oliver and Dawn Wright be appointed for the 2024/25; with one remaining vacancy
- d) Members noted the continuation of the External Independent representatives appointed.
- e) Members noted that the co-opted Court of Common Council places on the Committee were to be advertised after the meeting and appointed at the next meeting of the Board.

Professional Standards & Integrity Committee (PSIC)

- a) Members approved the terms of reference as proposed in Appendix 2.
- b) Members agree that Michael Mitchell be appointed Chair for 2024/25; and Tijs Broeke be appointed Deputy Chair for 2024/25.
- c) Members agreed that, in addition to the Police Authority Board's Chair and Deputy Chair, Jason Groves, Nicholas Bensted-Smith Michael Mitchell and Madush Gupta be appointed for 2024/25, with two remaining vacancies
- d) Members noted that the positions of external members would be appointed to by the Board.
- e) Members noted that the co-opted Court of Common Council places on the Committee were to be advertised after the meeting and appointed at the next meeting of the Board.

City of London Police Pensions Board

The Board agreed to defer this item to the next Police Authority Board Meeting.

Streets & Walkways Sub (Planning & Transportation) Committee

- Members agreed that Deputy Graham Packham be appointed.

Digital Services Committee

- Members agreed that Dawn Wright be appointed.

Homelessness & Rough Sleeping Sub (Community & Children's Services) Committee

- Members agreed that Helen Fentimen be appointed.

Association of Police and Crime Commissioners

- Members endorsed that Tijs Broeke represent the Police Authority Board after handover period with Deputy James Thomson.

Capital Buildings Board

- Members noted the appointment of the Deputy James Thomson and Alderman Timothy Hailes to the Capital Buildings Board.

Crime and Disorder Scrutiny Committee

- Members agreed the appointment of Deborah Oliver and Tijs Broeke to the Crime and Disorder Scrutiny Committee.

Projects and Procurement Subcommittee

- Members agreed to appoint Alderman Timothy Hailes to the Projects and Procurement Subcommittee.

Member Lead for Safeguarding and Public Protection (Vulnerability and ICV Scheme)

- The Members approved the appointment Deborah Oliver to serve as the Member Lead for Safeguarding and Public Protection (Vulnerability and ICV Scheme).

RESOLVED – That the Committee noted the report.

9. OUTSTANDING REFERENCES

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

Members noted that the report on Cluster Panels would not meet the deadline originally envisaged. It was the subject of active discussion between Corporation and police colleagues.

RESOLVED – That the Committee noted the report.

10. CHAIR'S PUBLIC UPDATE

Members received the Deputy Chair's public update.

RESOLVED, - that the Board noted the report.

11. COMMISSIONER'S UPDATE

Members received the Commissioner's public update.

During the discussion the following points were noted:

- Members expressed concern that a significant minority of cyclists in the City continue to offend and encouraged the continuation of confiscations of illegal e-scooters.
- Members agreed to raise the issue of anti-social cyclists with the Streets and Walkways Committee chair.
- Members suggested that the payment transition which relates to asset recovery would be included on the Police Authority Board agenda as part of the regular financial reporting to ensure continued monitoring. Officers assured Members around the work ongoing to monitor spending reviews and their outcomes.

RESOVLED, - that the report be noted.

12. FCCRAS UPDATE

Members received a verbal update on the Fraud and Cyber Crime Reporting and Analysis Service Procurement programme.

The programme continued to progress at pace and was on track for delivery in 2024. The fourth independent review would take place in June 2024.

RESOLVED, - that the update be noted.

13. CITY OF LONDON POLICE STAFF SURVEY UPDATE

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

During the discussion the following points were noted:

- There was an improved participation of 57% of City of London Police staff who engaged with the survey, which covered 7 key areas and highlighted progress in each area.
- Members expressed concern around the perceived lack of internal communications, and the low percentage of responses which indicated low confidence and motivation in the policing plan. Officers noted these areas for concern and provided assurance that work would be done to improve on these areas.
- Members welcomed the fact that the medium term financial plan had been stabilised and suggested that the communications plan could be improved to ensure that these positive outcomes would be disseminated to the wider staff.
- The Chair requested a report would be brought to the Police Authority Board outlining the actions taken to address the areas of concern.

RESOLVED, that – the report be noted.

14. DRAFT CITY OF LONDON POLICE ANNUAL REPORT 2023 -24

Members received a report of the Commissioner which outlined the Draft City of London Police annual report 2023-24.

Members were asked to forward any comments on the Annual Report back to Emma Cunningham.

RESOLVED, - that the report be noted.

15. FUTURE NETWORK PROGRAMME

Members received a report of the Chamberlain which provided an update on the Future Network Programme.

During the discussion the following points were noted:

- The Chamberlain confirmed that the network implementation costs for the new police accommodation would be covered by City of London Corporation as the corporate landlord, but there was work to be done to clarify whether that would include the complete costs involved. Members requested that the

risks of failure of delivery would be monitored through the Resource Risk and Estates Committee to ensure oversight.

RESOLVED, - that the report be noted.

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

Members queried the sustainability of the Independent Custody Visitors Scheme, given that there were currently only four members and no Chair. It was noted that passes were recently made available but not at convenient locations for visitors. It was noted that a report would be brought to the Professional Standards and Integrity Committee on 4 June 2024 which would cover the sustainability of the City of London Independent Custody Visitors Scheme. The volunteer posts were advertised in March and April but did not yield the desired number of application and would be repeated.

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 of the meeting held on 6 March 2024 were approved as an accurate record.

20. NON-PUBLIC OUTSTANDING REFERENCES

Members received a report of the Commissioner and Town Clerk which outlined the non-public outstanding references.

RESOVLED, - that the report be noted.

21. CHAIR'S NON-PUBLIC UPDATE

There was no update.

22. COMMISSIONER'S NON PUBLIC UPDATE

Members received the Commissioner's non-public update.

RESOLVED, - that the report be noted.

23. FCCRAS PROGRAMME PROGRESS UPDATE

Members received a report of the Commissioner which provided a non-public update on the progress of the Fraud and Cyber Crime Reporting and Analysis Service programme.

RESOLVED, - that the report be noted.

24. S22A COLLABORATION AGREEMENT- MINERVA- REQUEST FOR DELEGATED AUTHORITY

Members received a report of the Commissioner on the S22A Collaboration Agreement

25. TACTICAL FIREARMS TRAINING FACILITY UPDATE

Members received a report of the City Surveyor which provided an update on the tactical firearms training facility.

RESOLVED, - that the report be noted.

26. FUTURE ESTATE PORTFOLIO COMBINED DASHBOARD

Members received a report of the Commissioner which provided a combined dashboard of the Future Estate Portfolio.

RESOLVED, - that the report be noted.

27. EASTERN BASE PROGRESS REPORT

Members received a verbal update of the City Surveyor on the East Base progress.

RESOLVED, - that the report be noted.

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

There were no questions.

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

There were no items of urgent business.

The meeting ended at 1:06pm

Chairman

Contact Officer: Kezia Barrass

Kezia.Barrass@cityoflondon.gov.uk

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	In Progress- At 24 th 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 draft Terrorism (Protection of Premises) Bill , also known as Martyn's Law, for pre-legislative scrutiny by the Home Affairs Select Committee. During the remainder of 2024 and into 2025, further developments are expected and the revised Bill will be heard when parliamentary time allows.
14/2023/P	25 October - Item 11 NHP Strategy	The Chair asked for a report in respect of re-invigorating the cluster meetings and the communications supporting them.	PA Director/ Commissioner	In Progress- The final update on this OR was due at this PAB meeting, however, further negotiations are required with the wider CoL Senior Leadership Team and the Town Clerk is now taking this forward within CoL in consultation with the PA Director. The ambition is to bring an update back to 26 September SPPC and 2 October PAB.
2/2024/P	06 March- Item 5 Chairs Update-Angiolini Inquiry	The Chair asked the Commissioner and senior officers to provide a detailed report on the CoLP response to	Commissioner	Complete- This was submitted for the 4 June PSIC and is an item on the PAB agenda today..

		the Angiolini Inquiry Part 1 recommendations to the Police Authority Board in May.		
3/2024/P	08 May- Item 13- Staff Survey	Chair asked for a further update on Staff Survey back to this Board or appropriate Sub Committee later in the year to monitor progress on key themes and areas for improvement	Commissioner	In Progress- proposed timescale is 25 November SPPC and 4 December PAB for an update on Staff Survey. This will enable the Force time to demonstrate progress on the AFIs

Committee(s): Police Authority Board	Dated: June 2024
Subject: Chair's Update	Public
Report of: Tijs Broeke	For Information

Engagement

Since the last meeting of the Police Authority Board, engagement with national politicians on the City Police's local and national responsibilities continued prior to the General Election being called. During the preceding weeks, the City hosted visits by the Safeguarding Minister and Shadow Crime Reduction Minister. We also hosted a senior level roundtable which brought together representatives from law enforcement, criminal justice system, industry, and consumer & victims' groups to capture the strengths of the current system in fighting fraud and the actions needed to make a step-change in our collective response. It was attended by the Shadow Attorney General.

Association of Police and Crime Commissioners (APCC)

I attended an induction event for new Police and Crime Commissioners (PCCs) on 22 May, organised by the APCC, and attended the APCC General Meeting the following day. The political balance of the PCC and Mayoralty community has changed significantly following the PCC elections on 2 May. I had several helpful conversations with PCC colleagues, and stressed the importance of an effective local contribution to tackling fraud. As I mentioned at the Police Authority Board in May, the Deputy Chair and I will continue to engage closely with PCCs, Mayors and other Police Authority chairs and the APCC as an organisation. It is vital that the City is, and is seen to be, an engaged partner in this community.

General Election

Following the announcement of the General Election by the Prime Minister and the prorogation and dissolution of Parliament, Members will want to be aware of the guidance covering activities during the pre-election period. The Cabinet Office, and National Police Chiefs' Council guidance is available. At the time of writing, specific APCC guidance is expected shortly.

City of London Crime Prevention Association AGM

I was very pleased to attend, and speak, at the City of London Crime Prevention Association (CPA) AGM on 24 May. And it is an honour as PAB Chair to become the Patron of the organisation, succeeding James Thomson. The CPA has a distinguished record in initiating and supporting schemes which help keep the City,

and its residents, workers and visitors safe. Long may that continue. I spoke about my priorities as PAB Chair, as I outlined at the May Board, and the central role which effective partnership working has in ensuring that the City is the safest business district in the world. I very much value the CPA's contribution to that endeavour, and look forward to working closely with the organisation as PAB Chair, and as its patron.

Volunteers' Week 2024

3–9 June is Volunteers' Week. I want to put on record my thanks, and huge admiration, for all those who give up their time voluntarily to support the City Police and the Corporation, and help keep the City safe. Particular thanks go to the City Police Specials and volunteers, our Independent Custody Visitor cadre and members of the City's Independent Advisory and Scrutiny Group (IASG) and recently-formed Youth IASG. There is a Guildhall reception on 10 June to say thank you to the whole volunteer community.

Member briefings

I would highlight two forthcoming briefings for Members on policing matters:

- 5 June (14.00 – 15.30) on local policing issues; and
- 10 October (10.30 – 12.00) on the City Police's national responsibilities.

Both provide opportunities to learn more about the picture of crime in the City (and nationally), what the City Police are doing in response, and to ask questions of senior police officers and staff. I very much encourage attendance.

Agenda Item 6

Committee(s): Police Authority Board	Dated: 5 June 2024
Subject: Commissioner's Update	Public
Which outcomes in the <i>City Corporation's Corporate Plan</i> does this proposal aim to impact directly?	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Commissioner of Police Pol 74-24	For Information
Report author: Peter O'Doherty, T/Commissioner	

Summary

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

Animal Welfare

It was reported in international news when Household cavalry horses bolted from Buckingham Palace and travelled through the City at pace. City officers quickly deployed risking their own safety to provide first aid to the injured and anxious horses whilst keeping them calm awaiting the horse box and veterinarian. The courageous actions from our teams prevented any further harm and distress to the horses, public or property.

Drugs investigation

An intelligence led investigation by The Serious and Organised Crime Team uncovered a large-scale importation and supply of cannabis. Working in partnership with a number of agencies, City of London officers led a coordinated proactive operation recovering a significant amount of class B drugs and cash, disrupting a criminal network intent on causing harm not only in the city but across the country.

Cycle Team

Several successful operations were run by the Cycle Team focusing on anti-social cycling. Following community engagement, a particular concern was food couriers who were cycling dangerously and ignoring road laws. In partnership with a number of departments within the City of London police and the Corporation, 26 illegal e-cycles were seized, and 10 fixed penalty noticed issues. Reinforcing such anti-social and illegal behaviour will not be tolerated in the City.

Operation Reframe

‘Don’t cross the line campaign’ focused on educating the public and licensed premises about the offences of sexual touching. 44 licensed premises were visited promoting ‘don’t cross the line’ and the risk of drink spiking. A number were tested on the ‘Ask for Angela’ response which was positive and reinforced CoLP’s commitment alongside licensed premises making the City a safe place to work, socialise and visit.

Safeguarding Investigation

A city worker who was stalked by a prospective job applicant was quickly identified and located by City’s CID. Their quick intervention allowed the arrest of the individual who was charged and remanded. Ensuring the safety and security of any victim from predatory behaviour.

Strategic Leadership and Engagement

It has been a busy month focusing on strategic engagements to highlight to partners and government the leading role the City of London Police has in combatting Fraud & Cybercrime. On Tuesday 9th May 2024, AC Adams joined a roundtable discussion with Feryal Clark MP (Shadow Crime Reduction Minister at the City of London corporation offices. Discussion was focused on the threat of Economic Crime and the current response.

On Tuesday 14th May 2024, AC Adams joined a roundtable discussion with Emily Thornberry MP (Shadow Attorney General & Labour Policy Lead on Fraud). The roundtable brought together a small group of leading organisations working in law enforcement, industry, consumer protection and victim support to explore the strengths of the current system that should be protected and enhanced, and the options for where a labour government could improve the collective response to fraud.

On Wednesday 15th May 2024, AC Adams joined a panel and presented at the Cityforum Economic Crime Summit. The panel was chaired by Dominic Grieve KC (former Attorney General). The forum was joined by leading industry experts to discuss economic crime, the strengths and weaknesses in the financial centre & a spotlight on corruption.

On Wednesday 15th May 2023, AC Adams attended a parliamentary panel session and discussion. It was chaired by Dame Margaret Hodge MP with Simon Fell MP & Emily Thornberry MP in attendance. The event was titled, “The UK Fraud Epidemic - Turning the Tide on Fraud and Scams”.

Operational activity highlights

The Insurance Fraud Enforcement Department (IFED) has continued to target offenders’ post-conviction to make sure they don’t profit from their crimes. In May 2021 a fraudster was convicted for two counts of fraud where they utilised a claims management companies to make fraudulent claims obtaining referral fees from solicitors. They made 62 false claims for car accidents to insurers. A Proceeds of Crime enforcement hearing has now taken place at City of London Magistrates court with a £210,000 confiscation order made which includes an overseas property.

National Support & Co-ordination

In response to the legislative and policy changes, the Economic & Cyber Crime Academy (ECCA) has completed a full review of their learning offer, including its most popular courses – the Specialist Fraud Investigator Programme and the Accredited Counter Fraud Manager course. The new courses have been renamed and submitted to Skills for Justice Awards for accreditation. The courses focus on the wider fraud and economic crime arena and are the product of 12 months of dedicated research and development. In doing so, the ECCA has created a Professional Training Pathway, designed to complement the College of Policing’s Professionalising Investigation Programme (PIP), and support investigators from foundation level to complex economic crime investigations, including supervision and management. This will improve timeliness and outcome of investigations for the benefit of victims.

International Support & Co-ordination.

The Insurance Fraud Enforcement Department (IFED) presented at the Insurance Sweden annual conference in Stockholm on Monday 5th May 2024. The presentation focused on IFED’s work, the IFED operating model, and our public-private partnership. Attendees included insurance company CEOs, senior police figures, and an MP from current coalition.

The Police Intellectual Property Crime unit (PIPCU) attended the international anti-counterfeiting coalition conference in Orlando, Florida in May 2024. They presented to a panel of experts the excellent work PIPCU does as law enforcement specialists in this area. Their input was well received by delegates.

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Committee(s): Professional Standards and Integrity Committee	Dated: 4 June 2024
Police Authority Board	5 June 2024
Subject: Annual Review of Police Complaints Activity – 2022/23	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	Diverse engaged communities; dynamic economic growth; vibrant thriving destination
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Town Clerk	For Information
Report author: Rachael Waldron, Police Authority Compliance Lead, Town Clerks in consultation with Det Supt Carly Humphreys / PC Ann Roberts, Professional Standards Directorate	

Summary

This report provides an overview of complaints and allegations made about the City of London Police and the Action Fraud reporting service in 2022/23. There is a statutory requirement on specified local policing bodies to publish quarterly Independent Office for Police Conduct (IOPC) complaints data relating to their force, and the relevant IOPC annual statistics report (the most up to date being for 2022/23). Local policing bodies are also required to publish a narrative setting out how they are holding the relevant chief officer to account and an assessment of their own performance in carrying out their complaints handling functions. They are required to publish this information in a prominent place on their websites. The attached report, at Appendix 1, has been drafted with those obligations in mind.

Recommendations

That members note the contents of the attached report, to be published on the City of London Police Authority website.

Main report

Background

1. The Policing and Crime Act 2017 and supporting regulations made significant changes to the police complaints and disciplinary systems, which were designed to achieve a straightforward, more proportionate, and customer-

focused complaints system, focused on learning and improvement. These changes were implemented on 1 February 2020.

2. Reports of dissatisfaction, with the City of London Police are logged and assessed in line with Schedule 3 of the Police Reform Act 2002 and the Independent Office for Police Conduct (IOPC) Statutory Guidance 2020, with the City of London Police and the Police Authority (as the Local Policing Body for the City of London Police) responsible for handling the majority of complaints themselves.
3. The initial assessment and handling of complaints is undertaken by the City of London Police and can result in number of outcomes:
4. **Non-Schedule 3 or early service recovery.** The Professional Standards Directorate (PSD) of the City Police will make early contact with the complainant to understand their concerns and their dissatisfaction and, where the nature of their dissatisfaction allows, will try to resolve it to their satisfaction. This avoids a lengthier process of investigation and can provide a complainant with an early resolution, explanation or other satisfactory outcome. If at the end of this process, it cannot be resolved it may be dealt with as a formal complaint within Schedule 3.
5. **Schedule 3 Recorded** – IOPC Statutory Guidance stipulates where complaints must be recorded and those that must be investigated; these include the more serious matters. Complaints which do not require an investigation will be handled in a *reasonable and proportionate* manner to try to achieve an earlier resolution to the complainant's satisfaction, while others will be investigated formally. At the end of this process if the complainant remains dissatisfied with the outcome of the complaint they have a right of review by either the Local Policing Body or the IOPC, depending on the seriousness of the allegation.
6. **Referral to Independent Office for Police Conduct** – some complaints will be referred to the IOPC and they may decide to independently investigate or oversee a police investigation. The IOPC also monitor our complaints system. IOPC data covers these outcomes.

Report for 2022/23

7. The report sets out complaints data for 2022/23 (which is already in the public domain on the IOPC website), a description of how the City of London Police Commissioner is held to account in terms of complaints, and an account of the Police Authority's own performance in terms of its responsibility to undertake complaints reviews. It also contains an explanation of how learning from the complaints processes is being embedded in the City Police.
8. For the City of London Police, IOPC data also includes complaints made about the national Action Fraud reporting service. The City of London Police Force received 594 complaints in 2022/23, of which 167 were about the local force and 427 were about the Action Fraud Service. This is broadly comparable to the position in 2021/22 (588 complaints, of which 137 were about the local force

and 451 were about Action Fraud). The complaints in 2022/23 contained a total of 666 allegations (a reduction of 2% compared to 2021/2022).

9. In terms of data capture, it should be noted that a complaint may contain multiple allegations, each of which can relate to the City of London Police as an organisation or concern one or more individuals. These can be updated during the handling of the complaint if additional factors become apparent.
10. In terms of complaint reviews, review panels formed under the auspices of the Professional Standards and Integrity Committee met on three occasions during 2022/23 to consider four cases. The average number of days taken to make determinations in these cases was 200 days (it was 197 days in 2021/22).
11. The commonest complaints, accounting for 537 (90%) of cases concerned delivery of duties and service, often relating to dissatisfaction around lack of updates or delays in responses, rather than concerns around police misconduct. Consequently the Professional Standards Directorate have introduced a number of processes to improve the efficiency, timeliness and quality of outcomes provided to complainants.

Improvements

12. The commonest complaints, accounting for 537 (90%) of cases concerned delivery of duties and service, often relating to dissatisfaction around lack of updates or delays in responses, rather than concerns around police misconduct. Consequently the Professional Standards Directorate have introduced a number of processes to improve the efficiency, timeliness and quality of outcomes provided to complainants.
13. **Early service recovery:** In addition to the early service recovery now provided to complainants via the Professional Standards Office Manager, and wider Professional Standards Directorate Complaints Team, many complaints are being allocated directly to accountable Inspectors and Sergeants for resolution, to ensure proportionate responses are supplied with appropriate explanations and apologies to complainants.
14. **Development of Template Letters:** Complainant template letters have been further developed for use to ensure they remain fit for purpose and clearly sets out the rationale supporting decision making, no further action outcomes and signposting to alternative agencies outside the police complaints system where appropriate; who may be able to provide further assistance (I.e. Citizens advice, Ombudsman schemes and alternative professional services). This has helped to improve complainants understanding of the police complaints system overall.

15. **Scrutiny by the Police Authority:** Further work has also been undertaken by the Police Authority's Policy Officer to lead on the work and scrutiny functions provided by the Professional Standards and Integrity Committee.
16. **Monthly Review Panels by the PSI Committee:** In order to ensure that a timelier response can be provided to complainants following Review requests, the Police Authority's Compliance Lead has set monthly Review Panel dates for Members of the Professional Standards and Integrity Committee to meet and consider cases.
17. **Upskilling of Compliance Lead Role:** The Police Authority has continued to carry through a previous commitment to upskill the Compliance Lead (as part of their continual professional development training), which has included attendance to Statutory Workshops facilitated by the Independent Office for Police Conduct (IOPC); allowing for improved engagement opportunities with complainants and better quality Review outcomes of complex cases.
18. It is anticipated that complaints will continue to be progressed in a timely manner considering these changes.

Rachael Waldron

Police Authority Compliance Lead

Appendices

- Appendix 1 – Annual Review of Police Complaints Activity 2022/23; Glossary of terms; IOPC Annual Complaints Data Statistics

City of London Police – Complaints 2022/23

Introduction

This is an annual report of complaints and allegations made about the City of London Police and its national Action Fraud reporting service in 2022/23. Legislation¹ requires local policing bodies to publish the most recent Independent Office for Police Conduct (IOPC) quarterly complaints data for their force and the IOPC annual statistics report², alongside a narrative setting out how it is holding the chief officer to account, and its assessment of its own performance in carrying out its complaints handling functions.

A glossary of terms used in relation to police complaints is at Annex A to this Report.

2022/23 complaints data – At a glance

The City of London Police received **594 complaints** in 2022/23, of which **167** were about the local force and **427** were about the Action Fraud service*. These complaints contained a total of **666 allegations****.

The average time to log a complaint was **21 days** and the average time taken to contact a complainant was **17 days**. On average it took **50 days** to finalise cases falling outside of Schedule 3***, and **77 days** to finalise Schedule 3 cases.

The commonest complaints – accounting for 537 (90%) of cases – were about deliveries of duties and service. Of the 4 cases reviewed by the local policing body 4 were not upheld (meaning the policing body concluded the complaint had been handled appropriately) but recommended that additional measures were taken to remedy the dissatisfaction expressed by complainants.

**The City of London Police operates the national Action Fraud reporting service, complaints about which are included in its totals in IOPC figures*

***Each complaint may contain one or more allegations*

****Some complaints can be resolved by early intervention. If this does not occur, it must be recorded and investigated in line with IOPC guidance, which is known as a 'Schedule 3' complaint.*

City of London Police complaints 2022/23

Chart 1 visualises the total volume of complaints, allegations, and number of complainants in 2022/23 and their split between the local City of London police service and national Action Fraud reporting service. It shows that the majority (c.70%) relate to the latter.

¹ See [here](#)

² Available [include link to relevant data attached as Annex 'X't to the report]

Chart 1 – Total complaints Data

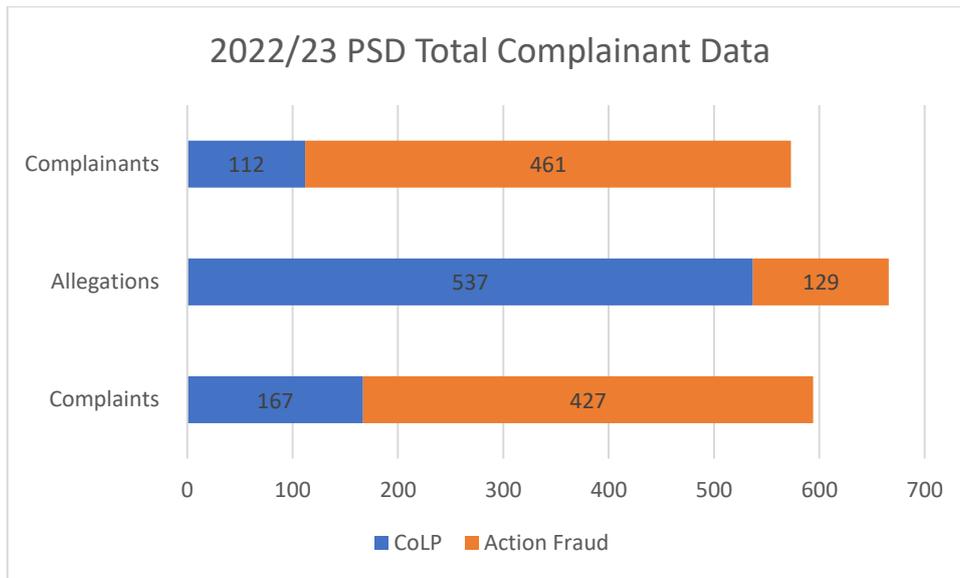


Chart 2 shows how many complaints against the local City of London police service were recorded under ‘Schedule 3’ in each quarter of 2022/23. ‘Schedule 3’ refers to complaints recorded and investigated in line with the Independent Office of Police Conduct’s statutory guidance. Some complaints may not require a detailed ‘Schedule 3’ enquiry to address, for example if someone wants explanation of an issue or to note a concern. In these cases a complaint is logged as ‘outside Schedule 3’. See Chapter 6 of [IOPC guidance](#) for full detail.

Chart 2 – Breakdown of Schedule 3 and non-Schedule 3 complaints (exc. Action Fraud)

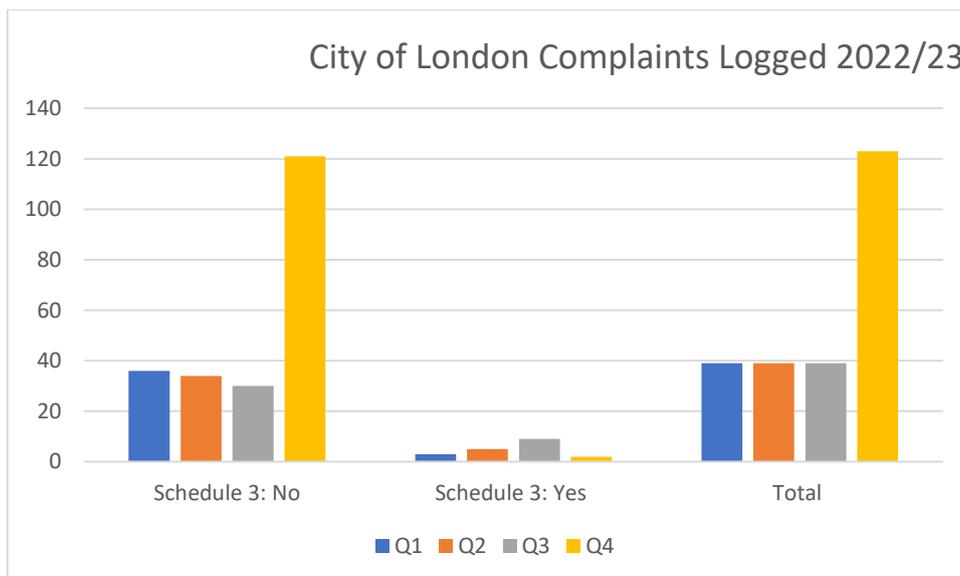


Chart 3 shows why complaints were recorded as ‘Schedule 3’ by the City of London police. IOPC guidance (see link for Chart 2) sets out that complaints must be logged under Schedule 3 if a) the nature of allegations meets certain criteria of seriousness,

b) if the chief officer or local policing body decides it is appropriate to do so, c) the complainant requests it be logged as such. A complaint initially not logged under Schedule 3 may then be if initial handling does not resolve it to the complainant's satisfaction.

Chart 3 – Reasons for recording complaints under Schedule 3 (inc. Action Fraud)

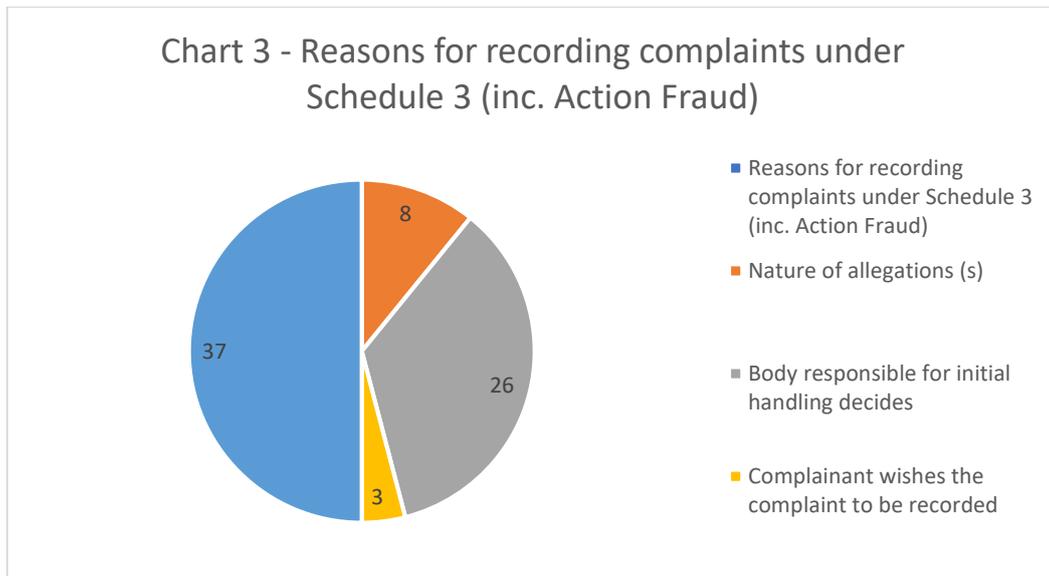
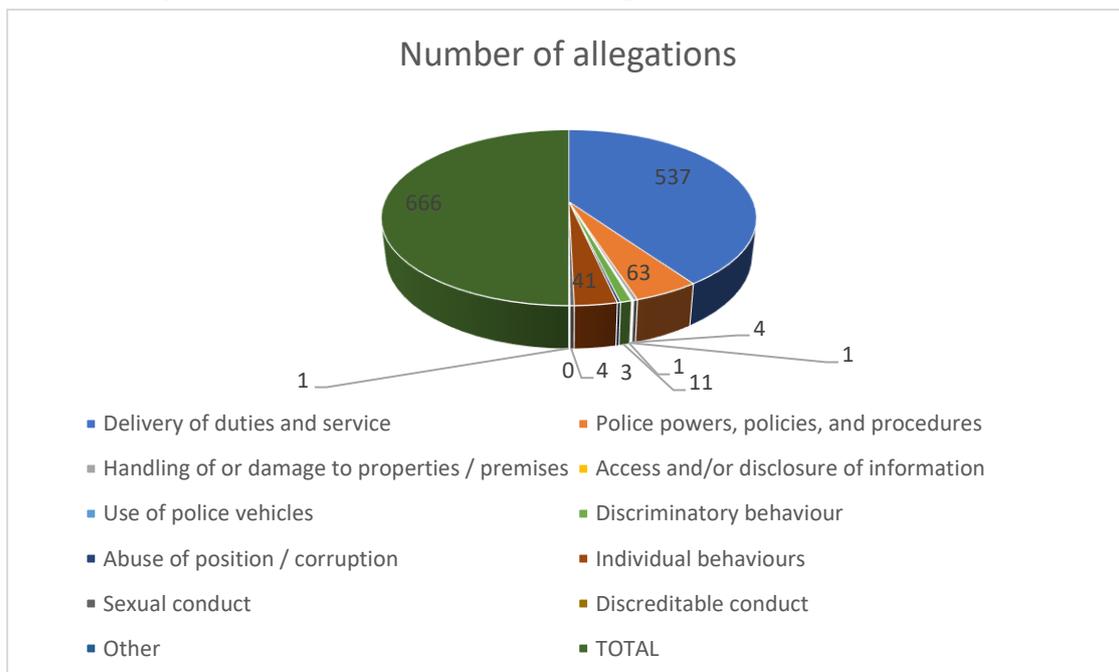


Chart 4 shows the breakdown of what types of allegations have been made against the City of London police. The following Table 1 shows the same information for additional clarity. **Chart 4 – Breakdown of allegations – what has been**

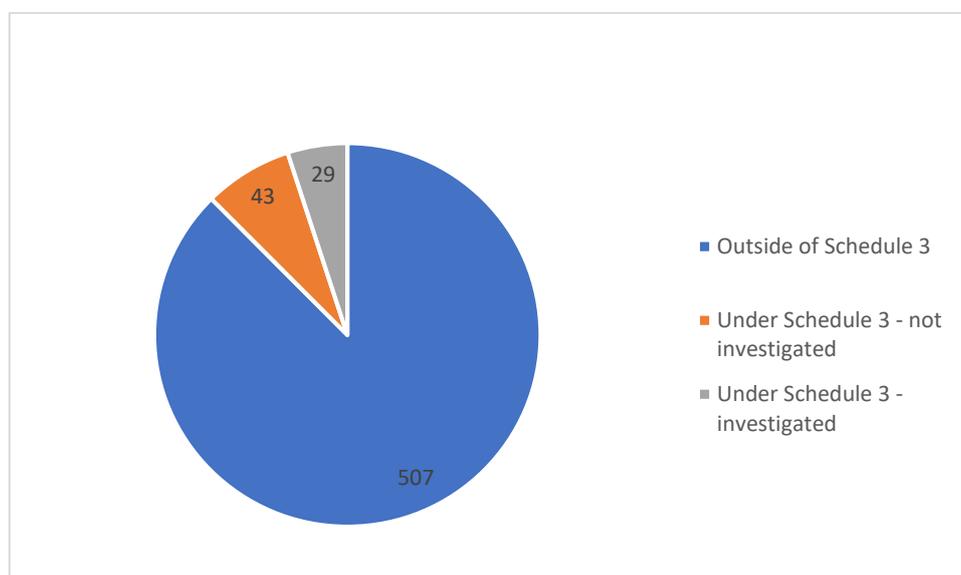


complained about (inc. Action Fraud)
Breakdown of allegations – what has been complained about in 2022/23

Table 1 – Breakdown of allegations - 2022/23	
Category	Number of allegations
Delivery of duties and service	537
Police powers, policies, and procedures	63
Handling of or damage to properties / premises	4
Access and/or disclosure of information	1
Use of police vehicles	1
Discriminatory behaviour	11
Abuse of position / corruption	3
Individual behaviours	41
Sexual conduct	4
Discreditable conduct	0
Other	1
TOTAL	666

Chart 5 shows how allegations were finalised (i.e. concluded). As set out for Chart 2, some complaints and allegations are not recorded under 'Schedule 3'. Not all complaints and allegations recorded as 'Schedule 3' must be investigated – for example if it is substantially the same as a complaint made previously. Chapter 10 [IOPC guidance](#) sets out when there is an is not a duty to investigate.

Chart 5 – Means by which allegations were finalised

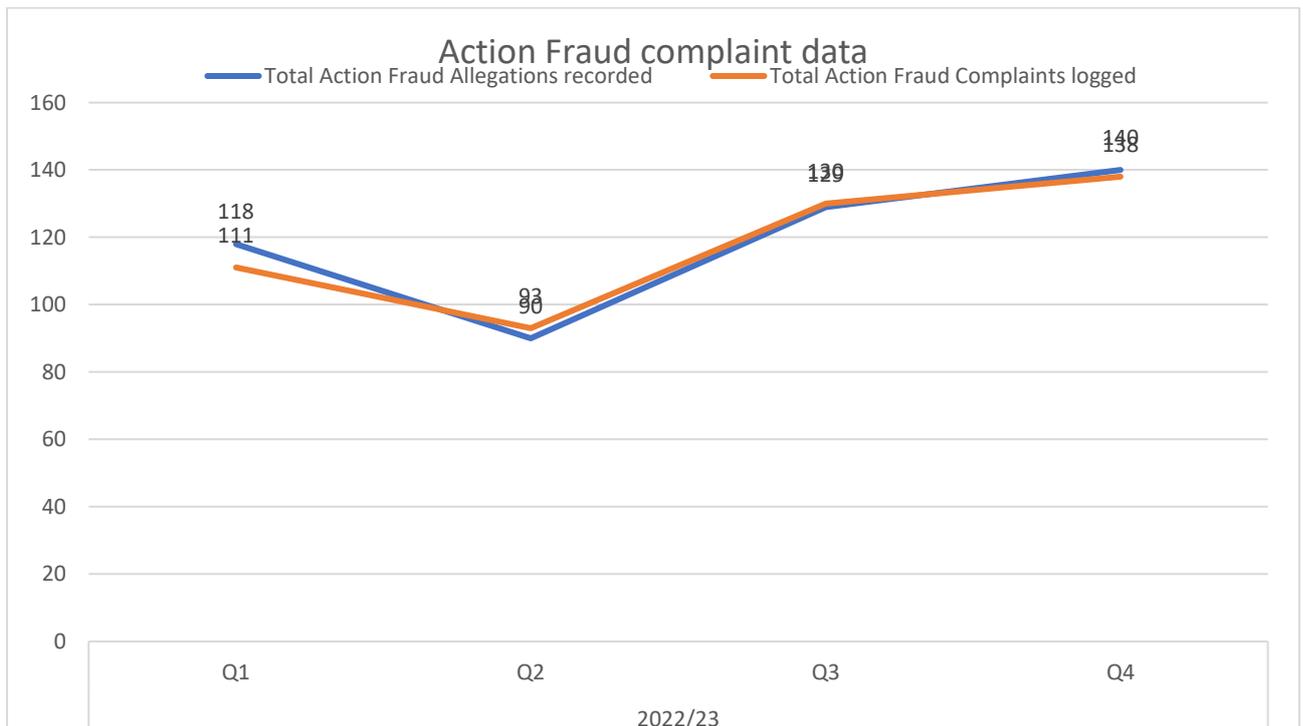


Sub-section on Action Fraud complaints

The City of London Police is the National Lead Force for economic crime. As part of this role the City Police operate the Action Fraud service for reporting and recording fraud offences – since 2013 all reported offences are sent to Action Fraud.

Complaints about Action Fraud are included in IOPC data on complaints about the City of London Police

This sub-section provides a brief breakdown of complaints about Action Fraud, using internal data.



As set out in Chart 1 above, 71% of complaints and allegations received by the City of London Police relate to Action Fraud.

Chart 6 shows the breakdown of 'Schedule 3' and 'non-Schedule 3' complaints about Action Fraud. Schedule 3' refers to complaints recorded and investigated in line with the Independent Office of Police Conduct's statutory guidance. Some complaints may not require a detailed 'Schedule 3' enquiry to address, for example if someone wants explanation of an issue or to note a concern. In these cases a complaint is logged as 'outside Schedule 3'. See Chapter 6 of [IOPC guidance](#) for full detail.

Chart 6 – Breakdown of Schedule 3 and non-Schedule 3 complaints – Action Fraud (internal data)

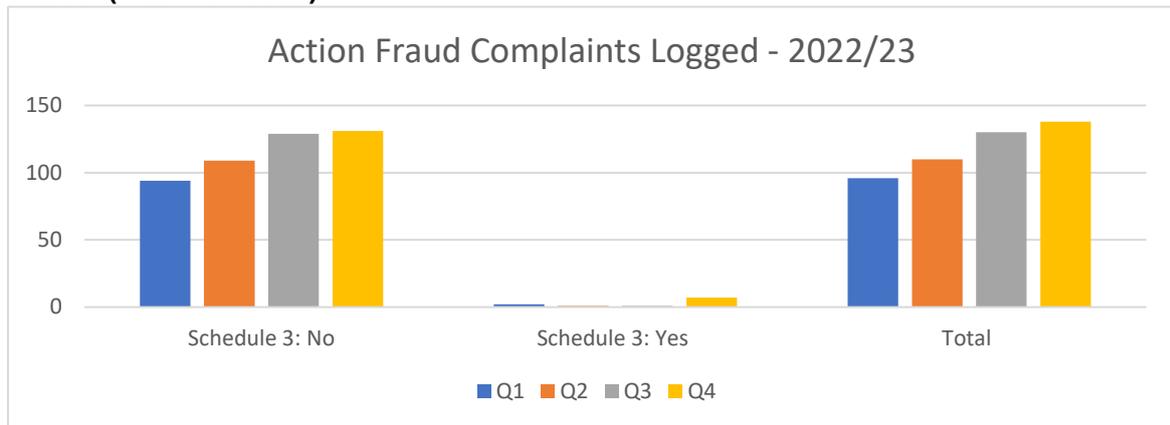
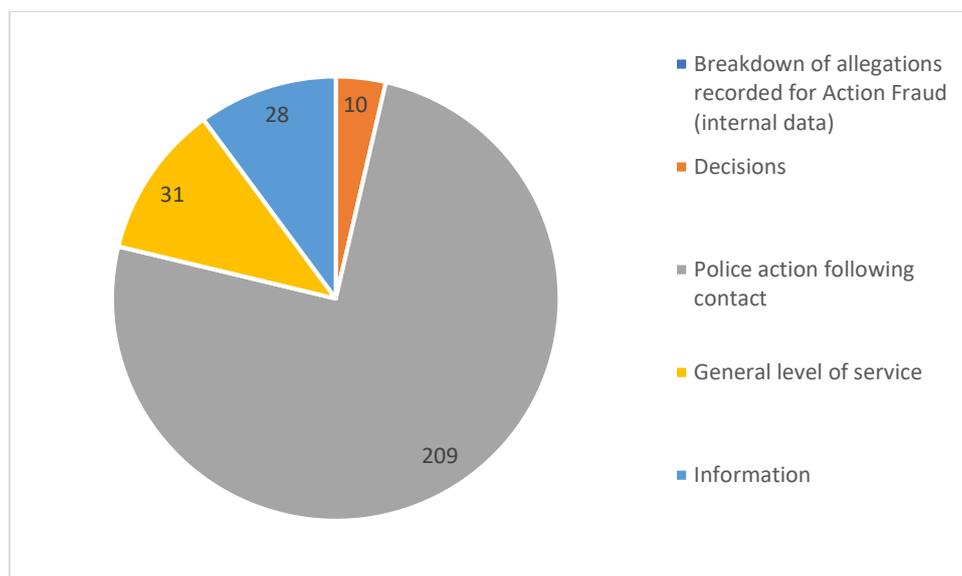


Chart 7 shows the breakdown of types of allegations received about Action Fraud.

It is important to note that, while the majority of allegations are about a failure to investigate cases sent to Action Fraud (in 'decisions' category below), Action Fraud is solely a reporting service and does not have investigative responsibilities. Cases sent to Action Fraud are first assessed by the National Fraud Intelligence Bureau and, where appropriate, are disseminated to local police forces to consider an investigation.

The City of London Police now, as standard, provides complainants with details of relevant partners and stakeholders that may be better placed to address their complaint and recovery of money lost, which has resulted in increasing number of cases being resolved to the complainant's satisfaction.

Chart 7 – Breakdown of allegations recorded for Action Fraud (internal data)



The City of London Police is the National Lead Force within the UK for Economic Crime investigation and since April 2013, receives all reports of fraud reported across England and Wales through the 'Action Fraud' reporting process. Reports made to Action Fraud are passed to the National Fraud Intelligence Bureau (NFIB) for their assessment, and potential dissemination to local forces, for them to consider an investigation.

Complaints regarding the delivery of the Action Fraud service are included with the City of London Police data by the IOPC. The City of London Police Authority's Professional Standards and Integrity Committee (see below) has received separate reporting on the Action Fraud and City Police complaints data since September 2020. This has allowed a more focused approach to scrutinising the separate areas of complaints.

Most Action Fraud complaints are in relation to failure to investigate reports made to them. However, Action Fraud has no investigative responsibilities and complaints of this nature fall outside the remit of the police complaints system.

While the police complaints system is unable to be utilised by complainants to overturn a previous outcome decision to investigate a reported fraud, PSD has continued to provide detailed prevention advice to complainants, which ensures that complainants are supplied with details of relevant partners and appropriately routed to stakeholders that may be better placed to address their complaint and recovery of money lost. This has helped to ensure that complainants expectations about the service provided by Action Fraud can be appropriately managed.

It is expected that the new Action Fraud Service Replacement service will assist with generation of greater insights across fraudulent activity that can rapidly be shared to prevent victim impact at scale.

How the City of London Police Commissioner is held to account

The Professional Standards and Integrity (PSI) Committee of the City of London Police Authority Board has responsibility for providing detailed oversight of professional standards in the City of London Police, including scrutiny of the City Police's handling of complaints and conduct matters. It is chaired by an external member of the City of London Police Authority Board. Members of this Committee also meet to determine complaints reviews received by the Police Authority (see below).

Further details on the overall work of this Committee can be found here: <https://democracy.cityoflondon.gov.uk/mgCommitteeDetails.aspx?ID=398>.

The outcome of the quarterly PSI Committee meetings is reported to the City of London Police Authority Board, which has the overall responsibility for holding the City of London Police Commissioner to account for running an effective and efficient police service.

During 2022/23, the PSI Committee received statistical updates on complaint cases and trends relating to (a) the nature of allegations in complaints, and (b) the means by which those allegations are resolved. The PSI Committee continues to perform a highly detailed scrutiny function to examine the casework of complaints logged by the City Police.

The PSI Committee has worked with the Detective Superintendent Professional Standards Department (PSD) of the City Police to ensure that the papers reviewed by Committee Members contain sufficient information to be able to assess whether an appropriate outcome was reached, while not unnecessarily revealing personal details of individuals involved or creating extra workload. In 2022/23, the Committee continued to look at matters of conduct; it received updates on all misconduct meetings and hearings which had been dealt with by the City Police.

The PSI Committee continues to support the City Police in ensuring themes identified in complaint or conduct cases are progressed as issues of organisational learning and embedded widely across the service. The PSD has also received an uplift of officers this year to address increases in both complaints and conduct matters. This growth will enable us to continue in providing a professional service to complainants.

Learning is central to the work of PSD. Complainants often express that they want the officer/organisation to acknowledge what went wrong and understand how the Force will ensure that similar issues will not happen again. The PSD Engagement Officer established excellent relationships throughout the Force during the period in question, sharing learning identified from PSD cases and matters of reputational importance. Reflective Practice has been immersed as a part of the learning culture the Police Regulations encourage.

The Organisational Learning Forum (OLF) in the City Police has an important role in terms of embedding learning in the Force. It is supported by tactical working groups focusing on custody, public order, stop and search and professional standards, to promote learning at a local level. The Professional Standards Directorate Working Group (PSDWG) is attended by the compliance officer from the City of London Corporation's Police Authority Team, representing the PSI Committee.

They attended meetings of the Professional Standards Directorate Working Group in 2022/23, engaged in refresher workshops facilitated by the IOPC with other South East area Offices of Police and Crime Commissioners, and provided the Committee with a digest of highlighted areas/themes of learning at these meetings.

The Police Authority Board's assessment of its own performance in carrying out its complaint handling function

Since February 2020, local policing bodies have been responsible for making determinations on reviews of police complaints, which are appeals by the complainant where they feel the response they have received has not been handled in a reasonable or proportionate manner.

In the City of London, this responsibility is delegated to the Professional Standards and Integrity Committee of the Police Authority Board, whose members meet (in line with the established governance within the Corporation) to hold review panels to consider review applications received by the Police Authority.

The review panel consists of the Chair and two other members of the Professional Standards and Integrity Committee. The panel exists independently to review the handling of complaints and determine whether the complaint in question was dealt with reasonably and proportionately. It also considers any themes, trends and wider organisational learning which emerge from complaints.

The complaints review panel function is supported by the Compliance Lead within the Police Authority Team in the City of London Corporation, who handles the review process from start to finish. Their duties include the acknowledgement and assessment of review requests submitted to the Police Authority, administration of the review documentation, and drafting a report of recommendations to the review panel for each case, based on consideration of the relevant documentation.

All review requests submitted to the Police Authority are assessed against the criteria outlined in the IOPC statutory guidance for police complaints.

Reviews considered in 2022/23

During 2022/23, the complaints review panel met on three occasions to consider four cases. The breakdown of the cases was as follows:

Outcomes of reviews by Local Policing Body:	Upheld	Not Upheld
Reviews completed	0	4
Subject matter of cases		
Police Powers, policies and procedures		

There is no statutory timescale for reviews to be completed under the IOPC statutory guidance. Nevertheless, the Police Authority recognises the importance of completing reviews in as timely a manner as practicable. There are, however, several factors which may cause a delay in the completion of a review request. These can include complexity of the case, and the necessity to make further enquiries with the force and/IOPC or the complainant, including reviewing police statements and Body Worn Video footage.

In 2022/23, requests for reviews were acknowledged 28 days of receipt. The average number of days taken for the review panel to make determinations on cases during this period was 200 days.

Themes

Three main themes emerged from complaint reviews submitted to the City of London Police Authority in 2022/23, which mirrored those which emerged in the preceding year:

i) *Perceptions of an inadequate service provided by the City of London Police:*

This includes expressions of dissatisfaction from complainants across the initial handling of a complaint submitted (i.e., delayed engagement from the force to the complainant to discuss proportionate measures to resolve the matter reported). Complainants have often referred to a lack of '*basic scoping/assessment of the facts*' in relation to complaint dissatisfaction; suggesting that improved scoping exercises to establish the facts could have led to different complaint outcomes.

ii) *Greater acknowledgement of the emotional/financial impact of police decisions on complainants:*

Particularly across complaints that allege a disproportionate or unfair use of police powers, policies and procedures (i.e., police vehicle stops, use of force, stop and search, arrest and detention). Complainants have often described the personal impact encountered as a result of their experience with the complaints process; frequently highlighting how resource intensive it is to take a police complaint forward.

iii) *Seeking appropriate reassurance that learning emerges from dissatisfaction and leads to fewer repeat incidents* – complainants have often cited a lack of acknowledgement from the force, on 'what went wrong' (across the handling of their complaint) suggesting that the force were dismissive or demonstrated a reluctance to use their complaint as an opportunity to identify lessons or areas of improvement.

These themes have been feedback directly to the Professional Standards Directorate Complaints Team, Professional Standards Directorate Engagement Officer and Working Group

Collectively these teams have continued to work extensively across the force, to address poor service as learning and encouraged more consistent use of continuous professional development and reflective review practice (a non-disciplinary processes). This process has enabled officers and line management opportunities to better understand complainants concerns and dissatisfaction; and identify key solutions to prevent future reoccurrences.

Signposting by the Police Authority: Complainants have been reminded about the Police Authority's remit in relation to the complaints system (i.e. to determine whether a reasonable and proportionate outcome was provided in respect to the handling of their complaint). Where appropriate, the Police Authority signposts complainants to alternative professional bodies outside the police complaints system that may be able to provide further impartial advice across a wide range of matters, such as the Citizens Advice Bureau and the Financial Conduct Authority.

In addition, any dissatisfied complainant is advised on their legal right to seek judicial review via an application to the High Court. No such applications were made during 2022/23.

Conclusion

The complaints picture for the City of London Police in 2022/23 is broadly comparable than for 2021/22, with a small increase in the total number of complaints and a small drop in the number of allegations. There was an increase in the number of complaints about the City Police's local policing responsibilities in 2022/23, which may be linked to a widening in the definition of a complaint to '*any expression of dissatisfaction*' which has helped to improve accessibility of the complaints system. It may also be symptomatic of the national picture of questions about the public's trust and confidence in policing.

While Action Fraud continues to generate a greater volume of complaints than the City of London Police's local policing responsibilities, it continues to account for a very small proportion of the total volume of Action Fraud incidents reported. In Q4 of the 2022/23 financial year Action Fraud (AF) recorded 132,224 reports on the National Fraud Database consisting of 85,359 crime reports and 46,865 information reports. The complaint figures (total) represent 0.10% of the total number of Action Fraud reports recorded in Q4.

For the most part, the top 5 allegation categories have also remained fairly consistent across 2021-23. However, there are several proactive steps in train to reduce complaints in this area which include: a Professional Standards Directorate Working Group and Professionalism newsletter, *enhanced Stop and Search/Use of Force Training and broadening of CoLP's Inclusivity Programme* (i.e. Training on Mentivity, Unconscious Bias, Active Bystander); and monthly PSD briefings with directorate heads and engagement leads to communicate specific learning and feedback across teams.

It is notable however, that the average time taken to log complaints, contact complainants and finalise cases via methods outside investigative measures has increased in contrast, which may indicate that the force has taken further steps to address the root cause of complaint dissatisfaction. Particularly by widening scoping activity and allocating complaints to subject matter experts in force to ensure that complaints are dealt with proportionately and diligently.

It should be noted that the average time taken to finalise complaints inside Schedule 3, has also increased. This may indicate that complaints have become more complex to investigate, particularly in circumstances where dissatisfaction relates to the conduct of persons serving with the police; as multiple allegations can be contained within a single complaint.

Additionally, taken together with the IOPC's direction to build public confidence; and calls for more action to improve how complaints are handled by police forces following inquiries such The Baroness Casey Review and The Angiolini Inquiry, there have been notable increases in complaints nationally that indicate members of the public are increasingly willing to raise their concerns. It is likely that this pattern will

continue as police culture and broader concerns surrounding women's safety in public continue to be examined in forthcoming Parts of the Angiolini review.

The Authority recognises that continued improvements are required to deliver a more customer focused approach to complaint handling. This approach should be one that engages, prioritises listening and effectively resolves dissatisfaction in a timely manner.

Doing so will help to support the Police Authority with its ambitions to be an effective oversight body, that supports the delivery of the Police Authority Board's Policing Plan; and provides a complaints system that the public can have full confidence in.

To this extent further work has been undertaken to improve the timeliness of independent complaint reviews; and strengthen the way the Authority discharges its responsibilities in respect to complaint handling and management of misconduct proceedings.

It should be noted that Police Complaints training has been completed by wider members of the Police Authority Team, and to all Members of the Professional Standards and Integrity Committee, providing better overall resilience across the police complaints system.

Annex A: glossary of terms

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

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

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

- a member of the public was adversely affected by the matter complained about, or is acting on behalf of someone who was adversely affected by the matter complained about
- a member of the public who claims to be the person in relation to whom the conduct took place
 - claims to have been adversely affected by the conduct
 - claims to have witnessed the conduct, or
 - is acting on behalf of someone who satisfies one of the above three criteria
- a member of the public can be said to be a witness to the conduct if, and only if: they have acquired their knowledge of the conduct in a manner which would make them a competent witness capable of giving admissible evidence of that conduct in criminal proceedings, or

- they possess or have in their control anything that could be used as admissible evidence in such proceedings

- a person acting on behalf of someone who falls within any of the three categories above. This person would be classed as an 'agent' or 'representative' and must have the written permission of the complainant to act on their behalf. A person is 'adversely affected' if they suffer distress or inconvenience, loss or damage, or are put in danger or at risk by the conduct complained of. This might apply, for example, to other people present at the incident, or to the parent of a child or young person, or a friend of the person directly affected. It does not include someone distressed by watching an incident on television.

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

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

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

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

Complaint recording

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

Changes to the Police Complaint & Conduct regulations in 2020 placed a greater emphasis on handling complaints in a *reasonable and proportionate* way and in a more customer focused manner.

Reports of dissatisfaction are logged and assessed in line with Schedule 3 of the Police Reform Act 2002 and IOPC Statutory Guidance 2020 and this assessment can result in one of a number of outcomes;

Non-Schedule 3 or early service recovery. PSD will make early contact with the complainant to understand their concerns and their dissatisfaction and, where the nature of their dissatisfaction allows, will try to resolve it to their satisfaction. This avoids a more lengthy process of investigation and can provide a complainant with an early resolution, explanation or other satisfactory outcome. If at the end of this process, it cannot be resolved it may be dealt with as a formal complaint within Schedule 3.

Schedule 3 Recorded – IOPC Statutory Guidance stipulates where complaints must be recorded and those that must be investigated; these include the more serious matters. Complaints which do not require an investigation will be handled in a *reasonable and proportionate* manner to try to achieve an earlier resolution to the complainant's satisfaction, while others will be investigated formally. At the end of this process if the complainant remains dissatisfied with the outcome of the complaint they have a right of review by either the Local Policing Body or the IOPC, depending on the seriousness of the allegation.

Referral to Independent Office for Police Conduct – some complaints may be referred to the IOPC and they may decide to independently investigate or oversee a police investigation. The IOPC also monitor our complaints system.

Investigations:

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

Investigation outcomes:

Where a complaint has been investigated but the investigation has not been subject to special procedures, or a complaint has been handled otherwise than by investigation, the outcome of the complaint should include a determination of whether:

- the service provided by the police was acceptable
- the service provided by the police was not acceptable, or
- we have looked into the complaint, but have not been able to determine if the service provided was acceptable

Reflective Practice Review Process:

Practice Requiring Improvement (PRI) is an appropriate outcome within Police Regulations for low level matters of complaint or conduct following a PSD investigation. The Reflective Practice Review Process (RPRP) is the process undertaken by officers to reflect upon their involvement and review the practice that requires improvement. Where a matter is raised or identified internally and does not reach the threshold for PSD investigation or disciplinary action, it should be handled locally by line managers and supervisors under RPRP. The process should be a clear focus on reflection, learning

from mistakes and focusing on actions / development to improve and, where necessary, put the issue right and prevent it from happening again. RPRP should be used for low-level intervention and performance issues that do not warrant a written warning or above or Unsatisfactory Performance Procedures (UPP).

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

Misconduct: A breach of the Standards of Professional Behaviour

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

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

Sub judice: After recording a complaint, the investigation or other procedure for dealing with the complaint may be suspended because the matter is considered to be sub judice. This is when continuing the investigation / other procedure would prejudice a criminal investigation or criminal Proceedings. There are a number of factors Police forces should consider when deciding whether a suspension is appropriate. The complainant must be notified in writing when the investigation / other procedure into their complaint is suspended and provided with an explanation for the decision. A complainant has the right to ask the IOPC to review that decision.

Withdrawn: A complainant may decide to withdraw one or more allegations in their complaint or that they wish no further action

to be taken in relation to their allegation/ complaint. In this case, no further action may be taken with regard to the allegation/ complaint.

Police Terminology

AA: Appropriate Authority

ANPR: Automatic Number Plate Recognition

ATOC: (Association of Train Operating Companies) agreements.

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

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

BWV : Body Worn Video

CAD: Computer Aided Dispatch

CCJ: County Court Judgement

DPS: Directorate Professional Standards (Metropolitan Police Service)

DSI: Death or Serious Injury

ECD: Economic Crime Directorate

FI: Financial Investigator

HCP: Health Care Professionals

IOPC: Independent Office of Police Conduct

LP: Local Policing

MIT: Major Investigation Team

MPS: Metropolitan Police Service

NFA: No Further Action

NLF: National Lead Force

NUT: National Union of Teachers

PCO: Public Carriage Office

PHV: Private Hire Vehicle

PMS: Property Management System

PNC: Police National Computer

POCA: Proceeds of Crime Act

PRI: Practice Requiring Improvement

P&T: Professionalism and Trust

SAR: Subject Access Request

SAR: Suspicious Activity Report

SIO: Senior Investigating Officer

SOP: Standard Operating Procedure

SO: Specialist Operations

STOT: Safer Transport Operations Team

TFG: Tactical Firearms Group

TfL: Transport for London

TPH: Taxi and Private Hire

Table 1 sets out full detail of IOPC data on complaints and allegations against the City of London Police in 2022/23. It is presented alongside national averages but please note that City of London IOPC data includes complaints and allegations made about the Action Fraud reporting service, which means volumes and response times are not necessarily directly comparable. Please see the section on Action Fraud complaints below for further information.

Table 1 – City of London Police complaints data 2022/23		
Metric	CoLP Data*	National average
Number of complaints logged (of which Action Fraud)	594 (427)	81,142
Number of complaints logged per 1,000 employees	411	329
Number of allegations logged (of which Action Fraud)	666	134,952
Number of allegations logged per 1,000 employees	461	547
Average time taken to log complaint	21 days	5 days
Average time taken to contact complainant	17 days	5 days
Number of complaint cases finalised – outside Schedule 3	448	1096
Number of complaint cases finalised – inside Schedule 3	76	694
Average time taken to finalise complaint – outside Schedule 3	50 days	19 days
Average time taken to finalise complaint – inside Schedule 3	77 days	132 days
Applications for review received by IOPC – investigated	1	803
Applications for review received by IOPC – not investigated	2	1188
Number of allegations finalised by investigation under Section 3 – investigated (not subject to special procedures)	23	15536
Number of allegations finalised by investigation under Section 3 – investigated (subject to special procedures)	6	1562
Average time taken to finalise allegations – outside Schedule 3	25	16
Average time taken to finalise allegations – not investigated under Schedule 3	53	98
Average time taken to finalise allegations – by local investigation under Schedule 3	180	159
<i>*Note that figures for the City of London include complaints and allegations about Action Fraud. This means they are not directly comparable to other forces data.</i>		

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Committee(s): Police Authority Board	Dates: 5 June 2024
Subject: 2023/24 Revenue and Capital Budget Outturn-Final	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Commissioner of Police Pol 58a-24	Information
Report author: Chief Finance Officer & Deputy CFOs	

Summary

This covering report accompanies a slide pack detailing the City of London Police’s final revenue and capital outturn for 2023/24, this is unchanged from the provisional outturn presented to the Resources, Risks and Estates Committee on 20 May 2024.

Revenue:

The final revenue outturn for the financial year 2023/24 is £104m against a latest approved budget of £104m, resulting in a balanced outturn position as forecast at Q3. In Q3 pay and other non-pay underspends provided the opportunity for the Force to meet £2.3m direct revenue financing of capital spend and a forecast overspend of £1.3m in relation to the Action Fraud Contact Centre. Further savings against pay, core supplies and services budgets, better recovery of direct and overhead costs from funded activities and the impact of mitigations to reduce the Contact Centre overspend to £0.7m since Q3, has enabled CoLP to (1) mitigate £3.3m of contract extension costs associated with the re-phasing of the Fraud and Cyber Crime Reporting and Analysis Service (FCCRAS) in 2024/25, (2) extend financing of the capital programme by £0.4m and (3) create an £0.8m Action Fraud reserve. It is expected that the creation of this Reserve, taken together with the £3.3m early advancing of CoLP’s contribution to the 50:50 cost share arrangement with the Home Office for FCCRAS extension costs, will help to significantly de-risk Police finances in 24/25, particularly in relation to the FCCRAS project.

In support of the provisional outturn position:

- **Slides 2-13** provides variance analysis to the final 2023/24 budget
- **Slide 14** provides a breakdown of overtime by business area,

- **Slides 15-18** provides an outturn summary for each of the business areas. The narrative highlights that whilst the Force is operating at headcount target levels the development of student officers means the allocation is heavily towards Local Policing, with vacancies in other areas.
- **Slide 19** provides a breakdown of the Force's £8.6m mitigations targets for 2023/24
- **Slides 20-22** provides a breakdown of Proceeds of Crime Act (POCA) funded activities
- **Slide 23** provides an update on the Force's reserves position as at the end of 2023/24.
- **Slides 24-25** details the 2023/24 outturn against the £1m Police Authority Board Team budget for 2023/24.

Capital:

The CoLP Capital Programme comprises projects developed and managed by the Force. The final outturn on the CoLP capital programme in 2023/24 is £13.903m, which, compared to the budget for 2023/24 of £25.344m resulted in an underspend of £11.441m (summarised in **Slide 26**).

The underspend is largely due to rephasing of FCCRAS milestones of £9.156m to 2024/25. Despite this, the related Home Office capital grant for 2023/24 of £11.2m has been fully utilised, with most of the City funding element being deferred to 2024/25. Underspends on other projects is closely in line with the position forecast at Q3 including the delayed use of the prioritisation and feasibility funding provision (£0.827m), a delay to the Data Analytics Platform Project (previously called Power BI) (£0.435m) and the delivery of the horsebox (£0.400m).

- **Slide 27** provides a more detailed breakdown of outturn capital spend against each project in 2023/24;
- **Slides 28 & 29** provide notes on outturn variations to budget; and
- **Slide 30** provides a breakdown of how the capital outturn spend is funded.

In addition to the CoLP funded projects, CoLP benefits from a number of 'infrastructure' projects led and funded by the Corporation, which are set out on slide 31.

Recommendations

Members of the Police Authority Board are asked to note the revenue and capital outturn for 2023-24 as set out in this covering report and accompanying slide pack.

Appendices

2023/24 Revenue and Capital Outturn slide pack, comprising 31 slides including the covering page.

Contact

Alistair Cook
Chief Financial Officer
alistair.cook@cityoflondon.police.uk

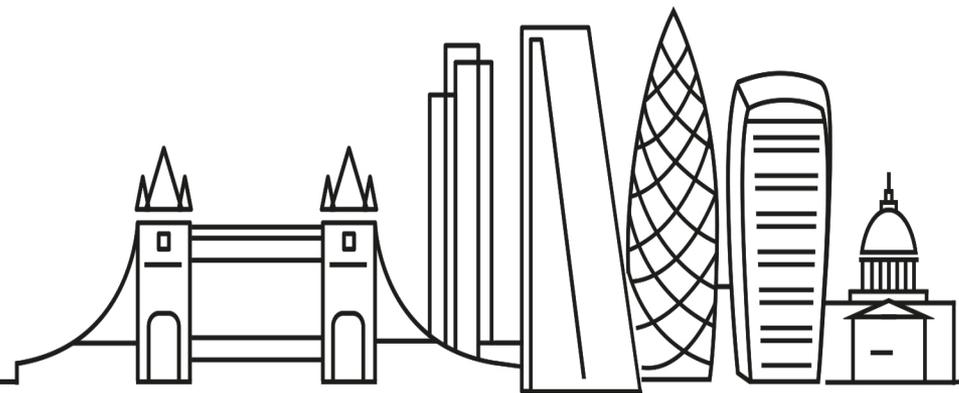
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Police Authority Board (PAB)

Final Revenue & Capital Budget Outturn 2023/24

Date: 05/06/2024

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A local service with a national role, trusted by our communities to deliver policing with professionalism, integrity and compassion

2023/24 Outturn - Headlines

Revenue: The revenue outturn for 2023/24 is £104m against a latest approved budget of £104m resulting in a breakeven position, as also forecast at Q3.

Within this breakeven position, c.£4.5m headroom arose from a high proportion of student officers, the staff recruitment trajectory and 'core' non-pay underspend, along with increased in-year recharges for funded work. This has enabled £2.5m revenue contribution towards the cost of the 2023/24 capital programme (shown under capital charges in Table 1 (Q3 forecast £2.3m)) and £4.1m Action Fraud related costs to be absorbed (incl. unbudgeted £2.6m in-year contribution to extension "cost share" with Home Office, £0.8m transfer to earmarked reserve, £0.7m Contact Centre staffing), which will significantly de-risk 24/25 finances, particularly in relation to implementation of Fraud and Cyber Crime Reporting and Analysis Service (FCCRAS).

The latest approved budget of £104m compares to an original 2023/24 revenue budget of £101m, which is an increase of £3m. The £3m increase is due to the addition of Supplementary Revenue Programme (SRP) expenditure (net £0.7m) and premises rental charges (£2.3m). The budget increases for the SRP and rental charges are net nil with budgets provided to match actual expenditure incurred.

Capital: Despite significant underspend arising from rephasing of the FCCRAS programme, the Home Office £11.2m capital grant was fully utilised in-year, with most of the City funding element being deferred to 24/25. On other capital projects, outturn was very close to the Q3 forecast.



2023/24 Revenue – Outturn Headlines

Headline variances between the latest approved budget and outturn are set out below:

- **Officer Pay:** A £1.3m overspend against Officer Pay due to a 4% higher than budgeted officer pay award (£1.7m), plus a £1,000 increase in the London Allowance for officers (£0.5m), totalling £2.2m has been largely offset by vacancies and rank ratio savings due to a higher proportion of student officers (£1.7m) in addition to the unbudgeted direct funding of relevant posts by National Lead Force activities.
- **Staff Pay:** £1.3m underspend on staff pay mainly due to vacancies which is partially offset by an increase in agency costs (£0.4m).
- **Overtime:** an increase in overtime of £1.3m due to funded work and other operational activities (Slide 8 explains).
- **Other Employee Costs:** A £0.5m overspend against injury awards, commuted pension lump sums & apprenticeship levy budgets due to an under provision compared to the 2022/23 outturn.
- **Premises:** A £0.7m pressure against premises budgets largely due to backdated energy bills going back several years which were retrospectively billed (£338k) and related to a faulty meter which has now been fixed. Higher than budgeted energy (£211k) and cleaning costs (£219k) as part of the corporate contracts, partly offset by an underspend on repair & maintenance across all CoLP estates (£108k).
- **Supplies & Services:** A £0.1m overspend in supplies and services budgets, including a net overspend of £2.6m in relation to Action Fraud extension cost, £0.7m Contact Centre costs due better recruitment outcomes than budgeted, higher than budgeted CCTV and security costs (£172k) and overspend on the clothing contract (£132k) due to additional uniforms being required. These costs have been largely offset by (1) lower than anticipated expenditure on firearms equipment (£383k) due to slippage, (2) an unused non-pay inflationary risk provision of £1m; which has been removed from the 2024/25 budget; for 2024/25 a 3% non-pay inflationary uplift has been included in the budget, (3) underspends of £1.5m against Enhanced Cyber Reporting / Fraud Reform supplies and services budgets and (4) underspends of £0.4m in respect of project OLAF, Funded Units and Crime Academy due to lower than forecast expenditure.



2023/24 Revenue Outturn - Headlines

- **Third Party Payments:** £31.8m higher than budgeted. Of this £31.3m relates to transfer payments to other forces and Regional Organised Crime Units (ROCU) for National Lead force activities with the expenditure matched by an increase in Home Office grant income and other contributions.
- **Transfer to Reserve:** £3.9m higher than budgeted due to £2.532m being transferred into City Fund to accelerate the repayment of the legacy Action Fraud loan (£2m) and ULEZ loan (£0.532m); there was a corresponding transfer from the Force's General Reserve into the Police budget to fund the repayment. In addition, £610k of Asset Recovery Incentivisation Scheme receipts, creation of the Action Fraud Reserve (£768k) and contribution to the Safer City Programme £0.05m were also included in the transfer to reserve movements.
- **Capital Charges:** mainly relate to the direct revenue funding of CoLP's 2023/24 capital programme costs (£2.7m).
- In addition to the £5.2m of unbudgeted loan repayments and revenue financing of the 2023/24 capital programme noted above, the Force also repaid (£3.9m) (via a negative financing adjustment to the 2023/24 budget): £2.5m towards the Action Fraud legacy loan, £380k towards the ULEZ loan and £1m to other general capital loan items. Total of loan repayments and revenue financing of capital programme costs was, therefore, some £9.1m in 2023/24.

These additional loan repayments and other cost pressures have been largely offset by:

- £2.5m drawdown from the Force's General Reserve to accelerate repayment of the legacy Action Fraud loan (£2m) and ULEZ legacy loan (£0.5m) in accordance with the proposal contained in the 2024/25 estimate report agreed by this Committee.
- Additional Home Office funding including a £2.4m pay award grant, a £0.45m Uplift over recruitment grant, further Counter Terrorism funding of £0.2m, along with funding for drugs testing, secondments and other income totalling £0.5m
- £1.9m including additional mutual aid income (£0.6m), training (£0.3m), Op Safeguard (£0.16m) and the recharging of staff time to £0.9m of additional fees and charges income including unbudgeted contractual penalty income £0.5m and ARIS/POCA receipts of £0.3m.



2023/24 Revenue Outturn – Headlines

- Additional savings against “core” budgets was also secured through an increased contribution from funded activities towards overhead costs of £0.9m.

Income and Funding

- Compared to the latest approved budget Government grant income has increased by some £32.1m this is mainly due to the £2.4m pay award grant, £0.45m officer uplift over recruitment and £32.2m of new funding for National Lead Force (NLF) Activities such as the Anti-Money Laundering Act Regulations (AMLAR) £2.5m, Fraud Reform £4.5m and other cybercrime / cryptocurrency grants (£25.2m), the majority of which will be transferred to other police forces and will be expensed through third party payments.

2023/24 Mitigations target = £8.6m, achieved £8.6m

With substitute mitigations (recharging to funded work) £8.6m of mitigations have been delivered, Table 4 refers.

Asset Recovery Incentivisation Scheme (ARIS) / Proceeds of Crime Act (POCA)

Receipts from the ARIS scheme transferred to the POCA Reserve in 2023/24 totalled £610k, with revenue expenditure funded from the POCA reserve as shown in Table 5 totalling £2.058m. The net impact on the POCA Reserve, and the balance brought forward into 2024/25 of £5.946m is shown in Table 6.

Police Authority Board (PAB): The outturn for the Police Authority Team budget is £741.5k against a latest approved budget of £1m, an underspend of £258.5k (Table 7 below refers). This compares to a forecast underspend of £264.6k at Q3 2023/24. This is mainly due to a vacancy in the PAB Team, underspends against supplies and services budgets and the inclusion of Home Office grant income for serious violence prevention which was not included in the original budget. Following a review of the apportionment methodology for central recharges by the Chamberlain’s team, the PAB Team outturn also includes £67.8k of charges for accommodation, corporate support and information technology.



2023/24 Revenue Outturn

Table 1 2023/24 Revenue Outturn	23/24 Original Budget £m	Q3 Projected Outturn +Deficit / (Surplus) £m	Q3 Projected Variance +Deficit / (Surplus) £m	23/24 Latest Budget £m	Actual Outturn (Full Year) £m	Full Year Outturn Variance +Deficit / (Surplus) £m	Notes
Pay							
Officers	70.6	71.7	1.1	70.6	71.9	1.3	(i)
Staff	32.4	31.5	(0.9)	32.4	31.1	(1.3)	(ii)
Overtime	2.2	3.0	0.8	2.2	3.5	1.3	(iii)
Agency	0.8	1.0	0.2	0.8	1.2	0.4	(iv)
Police Officer Pension	23.0	23.0	0.0	23.0	19.5	(3.5)	(v)
Indirect employee costs	2.1	2.6	0.5	2.1	2.6	0.5	(vi)
Total Pay	131.1	132.8	1.7	131.1	129.8	(1.2)	
Non-Pay							
Premises Costs	2.9	3.3	0.4	7.3	8.0	0.7	(vi)
Transport Costs	2.7	2.7	0.0	2.7	2.7	(0.0)	
Supplies and Services	37.1	37.0	(0.1)	37.1	37.2	0.1	(vii)
Third Party Payments	12.3	31.9	19.6	12.3	44.1	31.8	(viii)
Unidentified Saving	0.0	0.0	0.0	0.0	0.0	0.0	
CoL Support Services	3.3	3.4	0.1	3.3	3.0	(0.2)	
Capital Charges	0.5	2.8	2.3	0.5	3.1	2.6	(ix)
Transfer to Reserves	0.0	0.5	0.5	0.0	3.9	3.9	(x)
Total Non-Pay	58.8	81.6	22.8	63.2	101.9	38.7	
Total Expenditure	189.9	214.4	24.5	194.3	231.7	37.5	
Income							
Specific Grants	(69.7)	(93.1)	(23.4)	(69.7)	(101.8)	(32.1)	(xi)
Partnerships	(13.5)	(14.3)	(0.8)	(14.8)	(16.8)	(1.9)	(xii)
Fees & Charges	(3.5)	(3.5)	0.0	(3.5)	(4.5)	(0.9)	(xiii)
Transfer from Reserves	(2.2)	(2.5)	(0.3)	(2.2)	(4.6)	(2.5)	(xiv)
CoLP Core Funding	(101.0)	(101.0)	0.0	(104.0)	(104.0)	0.0	
Total Income	(189.9)	(214.4)	(24.5)	(194.3)	(231.7)	(37.5)	
Underlying Deficit	(0.0)	0.0	0.0	0.0	0.0	0.0	

2023/24 Outturn Variance Analysis

Police Uplift Maintenance: £2m of ringfenced funding in 2023/24 was dependent on the maintaining an officer headcount of 986 with check points at the end of September 2023 and March 2024. The Force also committed to recruiting an additional 10 officers to assist with the achievement of national targets. For each additional post, the Home Office agreed to provide £15,000 based on the numbers recruited in September and £30,000 in March 2024.

As shown in slide 12, the 996-headcount target was achieved in both September 2023 and March 2024 which has secured £2.85m of Government grant funding. Whilst the number of officers by headcount increased to 1001 in March 2024, it is expected that with natural attrition the officer numbers will reduce.

(i) Police Officer Pay: Overspend £1.3m (Q3 £1.1m overspend). The overspend is mainly due to the combination of a 7% officer pay award from September 2023 (£1.7m) and £1,000 increase in the London Allowance (0.5m) from the same date, total £2.2m. In addition, there has been £0.8m of funded growth through National Lead Force programmes such as Fraud Reform and Cybercrime. Whilst these cost pressures can be met through in year savings – principally staff vacancies - and additional Home Office pay award grant income (see below). The full year impact of an increase in the London Allowance (£1.1m) taken together with these pay pressure highlight a downstream Medium Term Financial Plan (MTPF) pressures which has been reflected in the 2024/25 budget. The £2.2m cost increase, due to wage price inflation has been partially offset by £1.7m of savings due to vacancies and rank ratio saving (£9m core posts less £7.3m of student officer recruitment – Slide 12 refers). These officer vacancies have been held to ensure that the Force remains within its agreed officer establishment (978 FTE) and as counterweight to recruiting a higher number of student officers. Most of the student officers (124) are attached to Local Policing which has resulted the adverse outturn (£3m overspend) in this business area (see slide 15).



2023/24 Outturn Variance Analysis

(ii) Staff Pay £1.3m underspend: (Q3: £0.9m underspend). The outturn includes a £1m pay pressure due to the c7% staff pay award, plus £1.6m of unbudgeted expenditure relating to Enhanced Cyber Reporting Service (ECRS), Anti-Money Laundering Act Regulations (AMLAR), Fraud Reform, Proceed of Crime Act (POCA) funded activities which were agreed after the 2023/24 budget was set. These additional pay cost are fully funded through additional Government grants and other income. Embedded in the net underspend, therefore, is £3.7m saving due to continuing staff vacancies – slides 12 and 13 refer. A workforce plan has been developed to progress staff recruitment from 450 FTEs in September to the 2024/25 budgeted establishment of 532.

Home Office Pay Award Grant: In June 2023, the Home Office confirmed that it would provide additional funding for policing over the Spending Review period of £330 million in 2023-24 and £515 million in 2024-25 to support an increase in pay for all police staff and officers above 2.5%. The Force will receive £2.4m in 2023/24 and a further £3.8m is expected in 2024/25. As noted during 2023/24, the funding distribution methodology, is based on current core grant allocations which excludes £11.3m of Capital City and Precept grant funding as well as £50m of specific grants which support National Lead Force activities. In total this funding provides for approximately 30% of the workforce and an initial assessment suggested that allocating the grant in line with funding formula shares will add a further cost pressure of c.£0.75m this year and, if continued, £1.3m per annum to future years.

(iii) Overtime £1.3m overspend (Q3: £0.9m overspend), which includes £0.65m of recoverable /activities events. This is an increase of £0.4m compared to the Q3 forecast and has been driven by backfilling duties and increased protest activities in the City. The Police Officer overtime budget (excluding National Lead Force) represents 3% of officer pay. A review of southeast forces (excluding the MPS) taken from the annual CIPFA POA survey suggests that 3% is within the range of other Forces albeit towards the lower end of the range. The monitoring and review of overtime is a standing item on the agenda of the Force's Strategic Finance Board.



2023/24 Outturn Variance Analysis

(iv) Indirect Employee Costs: £0.5m overspend (Q3 £0.5m overspend). This is due to an under provision for injury awards and apprenticeship levy costs in the 2023/24 budget, these have been reviewed in the 2024/25 budget setting process.

(v) Pension Deficit Grant: £3.5m underspend. This underspend relates to the Police Pensions expenditure funded by the Home Office. The underspend is matched by a corresponding reduction in Government grant income. The Pension's forecast has been updated for 2024/25.

(vi) Premises costs: £0.7m overspend (Q3: £0.4m overspend). The premises overspend is mainly due to several backdated energy bills going back several years, retrospectively billed (£338k), due to a faulty meter which has now been fixed. Higher than budgeted energy (£211k) and cleaning costs (£219k) as part of the corporate contracts, partly offset by an underspend on repairs & maintenance costs across the estate (£108k).

(vii) Supplies and Services: £0.1m overspend (Q3 £0.1m underspend). The overspend in supplies and services budgets, including a net overspend of £2.6m in relation to Action Fraud extension cost, £0.6m Contact Centre costs due better recruitment outcomes taking staffing numbers up to and at times above expected levels, higher than budgeted CCTV and security costs (£172k) and overspend on the clothing contract (£132k) due to additional uniforms being required. These costs have been largely offset by (1) lower than anticipated expenditure on firearms equipment (£383k) due to slippage, (2) an unused inflationary risk provision of £1m; which has been removed from the 2024/25 budget, (3) underspends of £1.5m against Enhanced Cyber Reporting / Fraud Reform supplies and services budgets and (4) underspends of £0.4m in respect of project OLAF, Funded Units and Crime Academy due to lower than budget expenditure.



2023/24 Outturn Variance Analysis

(viii) Third Party Payments: £31.8m overspend (Q3 £19.8m). Of this £31.3m relates to transfer payments to other forces and Regional Organised Crime Units (ROCU) for National Lead force activities with the expenditure matched by an increase in Home Office grant income and other contributions. The variance between outturn and Q3 (£24.5m) mainly relates to unbudgeted NPCC Cybercrime activities which were excluded from the Q3 monitoring as they are fully funded and outside of the Commissioner's core budget.

(ix) Capital Charges: £2.6m (Q3 £2.3m): This variance is due to a higher than planned revenue contribution to the financing of capital expenditure (£2.7m), less £0.1m central capital financing contribution. £2.7m represent the totality of the Force's capital programme spend in 2023/24 notwithstanding the £11.2m Home Office contribution to the FCCRAS project. The use of revenue funding to pay for the in-year capital programme costs will minimise internal borrowing and reduce future borrowing risks.

(x) Transfers to Reserve £3.9m. This relates to a transfer to reserves in respect of a £2.532m draw down from the Force's General Reserve to accelerate repayment of a legacy Action Fraud loan (£2m) and ULEZ legacy loan (£0.532m), £0.61m of Asset Recovery Incentivisation Scheme/Proceeds of Crime Act receipts, contribution to the Safer City Reserve £0.05m and creation of an Action Fraud Reserve (£0.768m) further de-risk project implementation costs.

(xi) Specific Grants: £32.1m over achievement. This mainly relates to additional grant income in respect of Enhanced Cyber Reporting Service (ECRS), Anti Money Laundering Act Regulation (AMLAR) & Fraud Reform (£32.2m), the Home Office pay award grant (£2.4m) and Uplift Over recruitment (£0.45m), further Counter Terrorism funding, drugs testing and other income totalling £0.5m. The outturn is also net of a £3.5m reduction in the pension deficit grant which is matched by a corresponding reduction in expenditure.



2023/24 Outturn Variance Analysis

(xii) Partnership Income £1.9m over achievement (Q3 £0.8m) This positive variance is mainly due to additional income arising from, mutual aid recharges of £0.6m, recharging of staff costs to the capital projects £0.6m (The future police estate and FCCRAS), training income £0.3m, additional project OLAF £0.16m contributions and Op Safeguard £0.16m relates to the use of three cells at Bishopsgate by other forces (BTP, MPS).

(xiii) Fees and Charges: £1.9m over achievement (Q3 £0.8m over achievement) £0.9m of additional fees and charges income including unbudgeted contractual penalty income £0.5m and higher ARIS/POCA receipts of £0.3m.

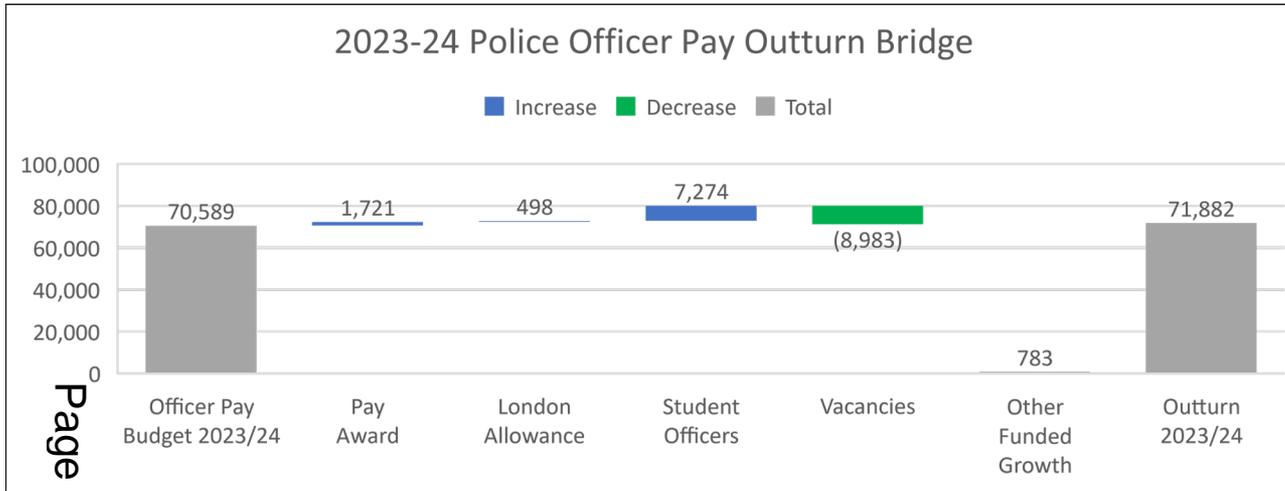
(xiv) Transfers from Reserve £2.5m. The variance relates to the £2.532m draw down from the Force's General Reserve to repay the Action Fraud and ULEZ loans.

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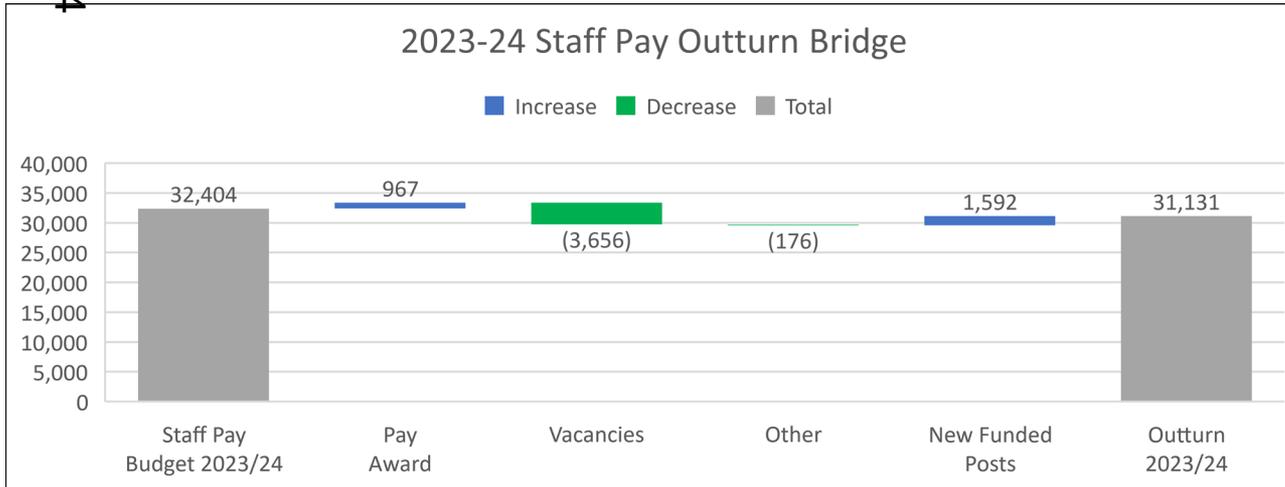


2023/24 Pay – Officer & Staff Bridge Analysis

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**Net £1.3m
Officer pay
overspend**

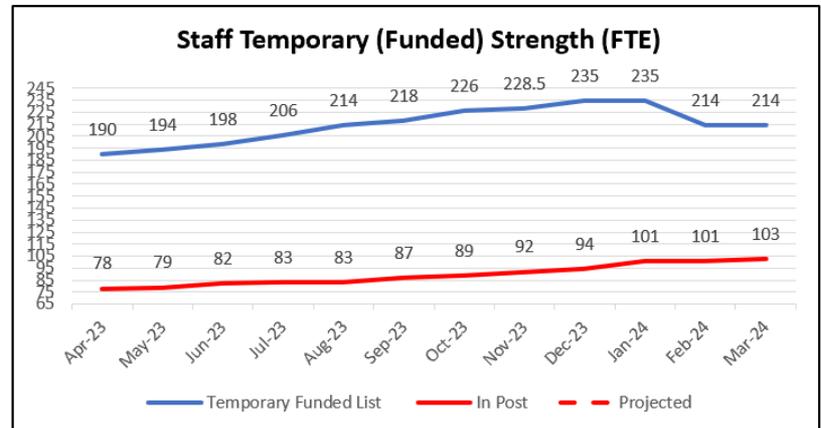
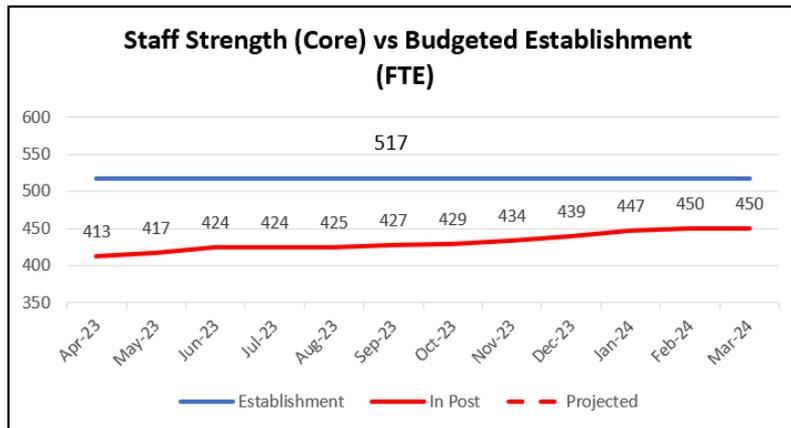
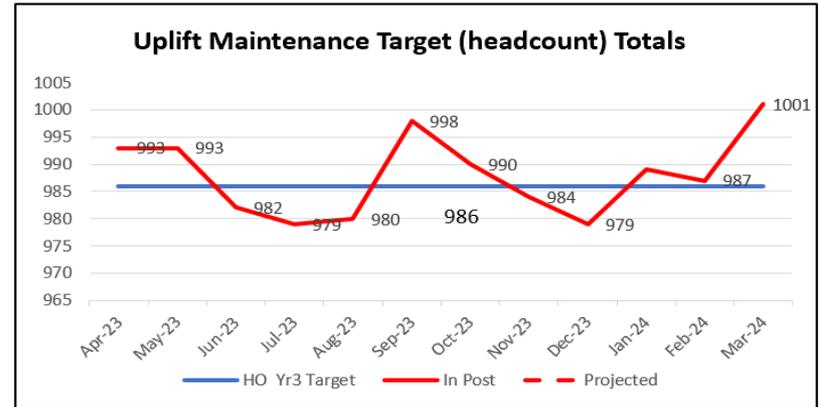
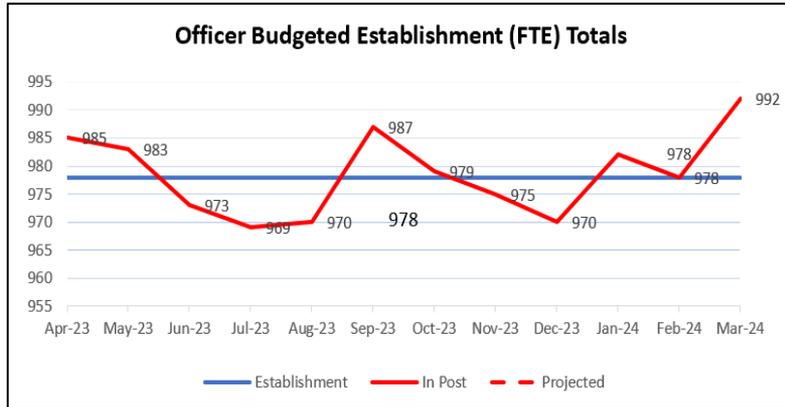


**Net £1.3m
Staff pay
underspend**



Revenue Monitoring 2023/24 Outturn – Workforce Dashboard

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2023/24 Outturn - Overtime

The overtime budget for 2023/24 totals £2.151m as shown in Table 2 below. The outturn is £3.482m resulting in an overspend of £1.3m. This is an increase of £0.4m compared to Q3. The forecast overspend is attributable to a combination of factors including supporting the student officers in undertaking their duties and backfilling of vacant roles in specialist unit, increased investigations/intelligence, Criminal Justice System activities in Specialist, National Lead Force operations and increased protest activity associated with the Middle East. The revised outturn also includes the impact of the 2023/24 Officer and Staff pay awards which have increased pay by c7%.

Of the total overtime shown below, some £0.65m is recoverable from third parties.

Page 66	Table 2: Overtime by Business Area 2023-24					
	23/24 Original Budget £m	Q3 Projected Outturn +Deficit / (Surplus) £m	Q3 Projected Variance +Deficit / (Surplus) £m	23/24 Latest Budget £m	Actual Outturn (Full Year) £m	Full Year Outturn Variance +Deficit / (Surplus) £m
Local Policing	813	1,070	257	1,033	1,541	508
Specialist Operations	242	592	350	242	702	460
National Lead Force	320	513	193	320	579	259
Corporate Services	0	59	59	0	104	104
Central Income & Expenditure	776	776	0	556	556	(0)
Grand Total	2,151	3,010	859	2,151	3,482	1,331

Home Office funding is only available where overtime costs exceed a threshold of 1% of core funding for a single event. In the case of the City of London Police the threshold is some £770k per event and has not been exceeded in 2023/24.

The monitoring of overtime will continue to be a standing item on the agenda of the Force's monthly Strategic Finance Board.



2023/24 Outturn – Business Area Summaries

Revenue outturn summaries for each of the business areas is shown in Table 3 below:

Table 3: 2023/24 Department Revenue Outturn Summaries	23/24 Original Budget	Q3 Projected Outturn +Deficit / (Surplus)	Q3 Projected Variance +Deficit / (Surplus)	23/24 Latest Budget	Actual Outturn	Outturn Variance to Budget +Deficit / (Surplus)	Notes
	£m	£m	£m	£m	£m	£m	
Local Policing	29.8	33.6	3.8	29.8	32.7	3.0	(i)
Specialist Operations	27.0	25.2	(1.8)	27.0	24.9	(2.1)	(ii)
National Lead Force	6.8	7.7	0.9	6.8	8.6	1.7	(iii)
Corporate Services	29.0	29.2	0.2	31.5	32.3	0.8	(iv)
Central Income & Expenditure	8.5	5.4	(3.1)	9.0	5.7	(3.4)	(v)
Total	101.1	101.1	0.0	104.1	104.1	(0.0)	

(i) **Local Policing: £3m overspend** (Q3 £3.8m overspend). In 2023/24 Local Policing had a outturn of £32.7m against a budget of £29.8m, resulting in an overspend of £3m. This was mainly due to student officer pay (£6.5m) associated with the Uplift programme, the impact of officer pay awards/ London Allowance increase (£0.9m) and an overtime overspend of £0.5m driven by: support to the MPS (£0.18m), Op Mayfield-Israel/Gaza protest (£0.06m), Notting Hill Carnival (£0.04m) and other protests and event in the City (£0.19m). These cost pressures (£7.9m) have been partially offset by vacancies in Local Policing of £4.2m, £0.4m of savings against supplies and services budget due to delays in Tactical Firearms Group (TFG) procurement and an unbudgeted re-imbusement of secondment income from the MPS (£0.39m).

The balance of the student pay cost will be met from officer vacancies across the other business areas.



2023/24 Business Area Summaries continued

(ii) Specialist Operations (SO): £2.1m underspend (Q3 £1.8m underspend). In 2023/24, Specialist Operations had an outturn position of £24.9m against a £27.0m budget, resulting in a £2.1m underspend. This underspend was due to significant levels of vacancies throughout the year (£1.2m) and additional unbudgeted income of £1.5m due to uplift in National Lead Force & Counter Terrorism funding for posts. These underspends were partially offset by a £0.5m budget pressure on overtime due to operational requirements and backfilling vacancies as well as a £0.2m overspend on supplies and services, transport and third-party payments due to operationally critical equipment repairs in addition to an increase in toxicology submissions linked to the Police Uplift Programme.

(iii) National Lead Force: £1.7m overspend (Q3 £0.9m overspend). Officer & Staff pay was £1.1m lower than budget owing to delayed start dates of over 50 posts during the year. The overtime budget was not substantial enough to cover a £0.6m final outturn, where existing officers were covering the work of vacant posts. Other Employee Expenditure (£0.5m more than budgeted) was the reclassification of national Cybercrime training courses from supplies & services. Transport costs (£0.2m higher than budgeted) was mainly incurred by the Funded Units during the year (leasing cars for investigations, vehicle repairs etc), supplies & services: £3.3m overspend for the IBM Extension & Contact Centre were offset by £1.9m of underspends against Fraud Reform, ECRS, OLAF, Funded Units & Crime Academy budgets. Third-party payments overspend of £31.5m (Cybercrime, Fraud Reform & AMLAR) were offset by £30.6m of additional government grants. In addition, the Funded Units and Action Fraud brought in £0.5m higher Customer Client Receipts than budgeted, £0.4m more POCA funds were transferred from reserve than budgeted owing to the bringing forward of key projects, and £0.5m of FCCRAS staff costs were transferred into the capital project.



2023/24 Business Area Summaries continued

(iv) Corporate Services: £0.8m overspend (Q3 £0.2m overspend). In 2023/24 CSD had a final outturn position of £32.6m against a budget of £31.5m, resulting in an overspend of £1.1m. This was largely due to: Employees – a net overspend of £0.4m, this comprises higher than budgeted pay awards for both staff and officers (£674k), additional funded posts by NLF (£710k), the use of temporary staff to cover vacancies (£0.5m), and unbudgeted overtime (£104k) largely offset by vacancies (£1.4m) and training budgets not being fully utilised in the year (£202k). Premises – net overspend of £662k, largely due to backdated energy bills going back several years, retrospectively billed (£338k), due to a faulty meter which has now been fixed. Higher than budgeted energy (£211k) and cleaning costs (£219k) as part of the corporate contracts, partly offset by an underspend on Repairs & Maintenance across all CoLP estates (£108k). Supplies and Services - net overspend of £699k, due to higher than budgeted CCTV and security costs (£172k) and an overspend on the clothing contract (£132k) due to additional uniforms being required. Transfer from reserves - overspend of £415k, due to a POCA bid being rejected after the budget was set, therefore the income was not transferred. Government grants - additional income of £583k from National Lead Force (NLF) funded posts (£361k), additional Cybercrime grant not budgeted (£135k) and international training income due to an increased number of courses provided (£85k). Other grants – £222k funding for NLEDS not in the original budget and £85k contribution for the Apprenticeship Training Programme. Recharges - higher amount of overhead recovery from NLF allocated than budgeted (£288k).



2023/24 Business Area Summaries continued

v) Central Expenditure & Income (CE&I): £3.4m underspend (Q3 £3.1m underspend). This division of service is used to manage indirect income and expenditure items which relate to all business areas. In 2023/24 the CE&I budget included several provisions including an allowance to mitigate against a higher-than-expected staff pay award (£0.6m), an officer adjustment factor (£0.5m) to manage the Uplift risk of over recruitment, an allowance for market forces supplements not captured in the salary estimates (£0.3m) and £1m for wider inflationary pressure. During the financial year 2023/24 these budgets along with a £0.4m agency budget were released as the impact of the cost pressures was incorporated into the outturn forecasts of the other business areas. The outturn also includes an increase in government grant funding of £3m relating to the 2023/24 Home Office pay award £2.4m, £0.45m Uplift over-recruitment incentive, £0.16m software licence grant and £0.3m of POCA receipts above budgeted levels. In addition, there was a higher amount of overhead costs recovery (£0.7m) from funded work than budgeted in pursuance of the Force's Income Strategy. This total positive variance of £7.1m is offset by an increase in the capital financing contribution of £2.7m to mitigate downstream borrowing risks and transfer to the Action Fraud Reserve (£0.768m) to help de-risk the revenue impact of the updated FCCRAS implementation plan on 2024/25 revenue budgets.



2023/24 Revenue Outturn - Mitigations

The 2023/24 revenue estimate included £8.6m of mitigations to deliver a balanced budget. Overall, whilst the £2m reduction in Action Fraud exceptional costs and rank ratio savings (£0.3m) have not fully materialised, due to substitute savings the mitigations target of £8.6m has been achieved. A summary of progress against each of the 2023/24 budget mitigations is shown in Table 4 below along with commentary on sustainability into future years.

Table 4:	Target	Outturn	Comments	RAG
2023/24 Mitigations Plan	£m	£m		
Reduction in Action Fraud exceptional costs	2.0	0.0	Mitigation not achieved due to rephasing of FCCRAS Delivery Implementation Plan.	
Higher Police Funding Settlement for 2023/24	1.5	1.5	Incorporated into 2023/24 Home Office funding settlement. Mitigation reflects difference between MTFP assumptions and final grant award for 2023/24. The higher Home Office funding is baked into core	
Increased use of the POCA Reserve	1.3	1.1	Continued use of POCA reserve to support the work of the Assest Recovery Team. Sustainability of this mitigation is dependent on the uncommitted balance held in the POCA reserve after 2024/25.	
Reduction in officer establishment to align with operational policing model	1.0	1.0	Achieved. Officer headcount reduced from 998 to 978 following planned reduction in Counter Terrorism funding from 2023/24. Sustained into 2024/25.	
Higher proportion of more junior PCs	0.6	0.8	Achieved through workforce planning and continued student officer recruitment. The impact of this mitigation is expected to reduce as the current cohort of students become fully fledged officers and move	
Increased recharging of costs to funded activities	0.5	1.5	Achieved. The increased direct recharging of staff and recovery of overheads from funded / non-core activities aligned to demand drivers.	
Non-pay savings: agency costs, professional fees and other	0.4	1.6	Whilst agency costs were £0.6m over budget due to the requirement to fill key staff vacancies, compensating non-pay savings across a range of supplies and services budgets secured delivery of this	
Improvements in Officer rank / supervisory ratios	0.3	0.1	Mitigation partially delivered from outcome of the Corporate Services Review.	
Saving to be identified	1.0	1.0	Achieved. National Non-Domestic rating appeal in relation Bishopsgate and New Street confirmed £1m annual reduction in rates which has been applied to the unidentified savings requirement. The NNDR	
Total	8.6	8.6	Overall assessed to be green as the outturn is within budget despite some of the 2023/24 mitigations targets falling short of expectations.	

2023/24 Proceeds of Crime Act Funded Expenditure

Table 5 below provides a summary of those workstreams which have been funded from the Proceeds of Crime Act (POCA) Reserve. In 2023/24 £2.051m of revenue and £7k of capital expenditure was funded from the POCA Reserve. The impact of this on the reserve position is shown in slide 23.

Column A shows the total commitment per priority area which may span more than one year and column C shows the planned expenditure in the financial year (2023/24). An explanatory note follows on slide 22.

Table 5: 2023/24 POCA Funded Expenditure	A	B	C	D	E = (D-C)	F (B+D)	G (A-F)	Notes
	Total Approved Budget	Prior Years Spend	Forecast Spend 2023/24 Q3	Actual Outturn 2023/24	Outturn Variance to Forecast +Deficit / (Surplus)	Total Prior year & 23/24 Spend	Balance Remaining Total Budget vs Total Spend	
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	
Safer City Partnership	150	100	50	50	0	150	0	(i)
Total Community Projects	150	100	50	50	0	150	0	
Asset Recovery & Civil Contingencies Team	4,500	1,081	1,254	1,040	(214)	2,121	(2,379)	(ii)
Total Asset Recovery	4,500	1,081	1,254	1,040	(214)	2,121	(2,379)	
Covert Tasking Budget	288	35	42	0	(42)	35	(253)	(iii)
Operation Creative	200	0	138	0	(138)	0	(200)	(iv)
National Protect Coordination and Regional Support	335	0	144	151	7	151	(184)	(v)
Streamlined Forensic Reporting	30	20	9	3	(6)	23	(7)	(vi)
Stakeholder Engagement Manager	200	0	53	0	(53)	0	(200)	(vii)
DANY (District Attorney New York)	550	241	276	233	(43)	474	(76)	(viii)
NFIB Service Delivery Team (SDT) - Quality Assurance	150	0	150	204	54	204	54	(ix)
NFIB - Continuous Improvement	220	11	178	14	(164)	25	(195)	(x)
Op Reframe - Police Boxes	74	34	0	0	0	34	(40)	(x)
LA International FCCRAS	223	0	223	223	0	223	(0)	
NBCC Communications & Marketing	21	11	0	1	1	11	(10)	
Total Crime Reduction	2,270	341	1,213	828	(385)	946	(1,100)	
NLF: People Strategy	93	0	94	0	(94)	0	(93)	(xi)
First Aid Nursing Yeomanry	20	0	0	10	10	10	(10)	
POCA project/governance review	50	0	0	44	44	44	(6)	
Psychometric Development Tool	109	0	0	80	80	80	(29)	(xii)
Total Miscellaneous	272	0	94	134	40	0	(93)	
Total Revenue Funding	7,191	1,522	2,611	2,051	(559)	3,217	(3,572)	

2023/24 Proceeds of Crime Act Funded Expenditure

Table 5: 2023/24 POCA Funded Expenditure	A	B	C	D	E = (D-C)	F (B+D)	G (A-F)	Notes
	Total Approved Budget	Prior Years Spend	Forecast Spend 2023/24 Q3	Actual Outturn 2023/24	Outturn Variance to Forecast +Deficit / (Surplus)	Total Prior year & 23/24 Spend	Balance Remaining Total Budget vs Total Spend	
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	
Power BI Phase 2	650	0	5	0	(5)	0	(650)	(xiii)
Child Abuse & Image Database (CAID)	53	33	7	7	(0)	40	(13)	(xiv)
Total Capital Funding	703	33	12	7		40	(663)	
Grand Total (Revenue & Capital)	7,894	1,555	2,623	2,058	(559)	3,257	(4,236)	

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Notes:

- i. Contribution to Safer City Partnership from ARIS receipts
- ii. Funding of Asset Recovery Team was agreed for an initial period of three years 2022/23 to 2024/25 of £1.3m per annum. 2023/24 is year 2. Additional funding of £600k was agreed from 23/24 to drive civil recovery activities across a period of three years at £200k pa.
- iii. An overtime/tasking budget for Covert/SIU was agreed for a period of 3 years, totalling £287.5k. 2023/24 is Year 2.
- iv. Operation Creative is an Initiative, designed to disrupt and prevent websites from providing unauthorised access to copyright content, a budget of £200k has been agreed to support this project.
- v. The National Protect and Regional Support initiative is a project to establish of a national hub to tackle volume fraud.
- vi. In 2021/22 £30k of funding was agreed to support the enhancement of streamlined financial investigation reporting across CoLP.
- vii. The stakeholder and engagement project seeks to inform the future delivery of the National Fraud Intelligence Bureau (NFIB).



2023/24 Proceeds of Crime Act Funded Expenditure

Notes

- viii. The DANY project supports the secondment of two officers to the District Attorney's Office in New York until 31.03.24.
- ix. Funding has been agreed to enable NFIB Quality Assurance Testing to support the continuous improvement of the Action Fraud victim support service.
- x. This is an initial scoping project assessing the potential for the introduction of digital police boxes. Further progression will be subject to further business case development.
- xi. NLF People Strategy – Project designed to implement initiatives to improve recruitment and retention of staff within economic crime across the UK
- xii. Psychometric Development Tool – This project is a training development initiative to increase understanding of self and others which will have benefits in enhancing engagement with other and the yield benefits through the interpretation of the findings.
- xiii. PowerBI and CAID form part of the capital programme which are set out later in this report.

A review of project governance including the benefits and outcomes of these POCA funded initiatives and future prioritisation is in process and a report will be provided to this Committee at a future meeting. An assessment of forward income projections will also be developed to ascertain the extent to which asset recovery activities can be supported using POCA receipts.



2023/24 - Reserves

Police Reserves are set out in Table 6 below:

Based on the outturn above, it is expected that Reserves will reduce by £3.2m from an opening balance of £16.8m to £13.6m. This is due to ARIS/POCA funded activities and the proposal to repay the remaining balance on the Action Fraud loan (£2m) and the ULEZ vehicle replacement loan (£0.532m). The repayment of these loans from the General Reserve will help to mitigate downstream loan repayment pressures and accelerate the transition to revenue financing of the capital programme, whilst maintaining a General Reserve of more than 5% of Net Revenue Expenditure (NRE)

The Force's Reserve Strategy set a general reserve target of 5% of gross revenue expenditure to mitigate unforeseen events. The forecast balance, after repayment of the above loans, is £6.6m or 5.7% of net revenue expenditure (NRE) in 2024/25. Typically, the Home Office expect that forces general reserves will not exceed 5% of NRE, however, due to the specific risks of the Force's National Lead status holding a General Reserve more than 5% of NRE is considered appropriate. The adequacy and any requirement to draw upon the General Reserve, will be kept under review.

The net drawdown from the POCA reserve of £1.45m is net of a £0.61m transfer to reserve, with £2.1m funding allocated to the 2023/24 POCA programme as set out in Table 5.

Table 6: 2023/24 Use of Reserves	Opening Balance	Transfer to/ (from) Reserve	Closing Balance
	2023/24	2023/24	2023/24
	£'m	£'m	£'m
General Reserve	9,127	(2,532)	6,595
Specific Reserves:			
Proceeds of Crime Act (POCA)	7,396	(1,450)	5,946
Action Fraud Reserve	0	768	768
Emergency Services Mobile Technology	294	0	294
Total Specific Reserves	7,690	(682)	7,008
Total	16,817	(3,215)	13,602

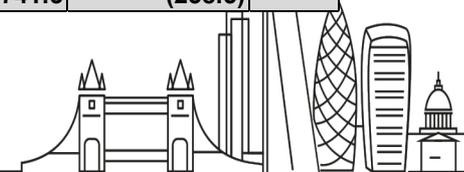


2023/24 Police Authority Team Revenue Outturn

The outturn for the Police Authority Team budget is £741.5k against a latest approved budget of £1m, an underspend of £258.5k (Table 7 below refers). This compares to a forecast underspend of £264.6k at Q3 2023/24. This is mainly due to a vacancy in the PAB Team, underspends against supplies and services budgets and the inclusion of Home Office grant income for serious violence prevention and from the Safer Streets fund which were not included in the original budget; this funding is to facilitate joint working between local agencies to plan, prevent and reduce serious violence.

Table 7 sets out the Police Authority Team budget and outturn for 2023/24.

Table 7: Police Authority Team Outturn 2023/24	23/24 Original Budget	Q3 Projected Outturn +Deficit / (Surplus)	Q3 Projected Variance +Deficit / (Surplus)	23/24 Latest Budget	Actual Outturn (Full Year)	Outturn Variance +Deficit / (Surplus)	Notes
	£'000	£'000	£'000	£'000	£'000	£'000	
Staff	698.0	660.0	(38.0)	698.0	630.0	(68.0)	(i)
Indirect employee costs	17.0	8.0	(9.0)	17.0	4.4	(12.6)	
Total Pay	715.0	668.0	(47.0)	715.0	634.4	(80.6)	
Supplies and Services	285.0	142.4	(142.6)	285.0	129.8	(155.2)	(ii)
Third Party Payments	0.0	0.0	0.0	0.0	127.4	127.4	(iii)
CoL Support Services	0.0	0.0	0.0	0.0	67.8	67.8	(iv)
Non-Pay	285.0	142.4	(142.6)	285.0	325.0	40.0	
Total Expenditure	1,000.0	810.4	(189.6)	1,000.0	959.3	(40.7)	
Government Grants	0.0	(75.0)	(75.0)	(0.0)	(208.1)	(208.0)	(v)
Customer Client Receipts	0.0	0.0	0.0	0.0	(9.8)	(9.8)	(vi)
Total Income	0.0	(75.0)	(75.0)	(0.0)	(217.9)	(217.8)	
Net Expenditure	1,000.0	735.4	(264.6)	1,000.0	741.5	(258.5)	



2023/24 Police Authority Team Revenue Outturn

The outturn underspend is reduced compared to 2022/23 (22/23 £447k), one reason for this is that the Police Authority Team has been trialling, for the first time, the provision of grants to fund specific crime reduction initiatives. Overall, it is expected that the £1m budget will be fully utilised in 2024/25 as the staffing model moves towards full capacity and policy priorities are further developed.

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Capital Outturn 2023/24 Headlines

- The CoLP Capital Programme comprises projects developed and managed by the Force, which are either funded directly from the Force's own resources, from Home Office funding or via a Corporation loan facility.
- The CoLP Capital Programme budget for 2023/24 amounted to **£25.417m** as shown in table 1 below. The outturn spend amounted to **£13.976m**, resulting in an overall underspend on the programme of **£11.441m**.

	A	B	C=B-A	D	E=D-B
Table 1 – Summary of outturn capital expenditure 2023/24	2023/24 Budget £'000	2023/24 Outturn £'000	Variance: Outturn vs Budget £'000	2023/24 Q3 Forecast Outturn £'000	Variance: Outturn vs Q3 Forecast £'000
Total outturn capital expenditure 2023/24	25,417	13,976	(11,441)	18,682	(4,706)

- The underspend is largely due to rephasing of FCCRAS milestones of £9.156m to 2024/25. Despite this, the related Home Office capital grant for 2023/24 of £11.2m has been fully utilised, with most of the City funding element being deferred to 2024/25. The underspends on other projects vs budget were very much in line with Q3 forecast (incl. delayed use of the prioritisation and feasibility funding provision (£0.827m), a delay to the Data Analytics Platform Project (previously called Power BI) (£0.435m) and the delivery of the horsebox (£0.400m)). A breakdown of the capital programme is shown in table 2 on slides 27 to 28 and how it is funded is shown on slide 30.
- For completeness, included within the capital programme noted above are CoLP projects which are deemed to be revenue in nature, referred to as Supplementary Revenue Projects (SRP). Total outturn spend on SRPs in 2023/24 amounted to £176k compared to a budgeted spend of £181k.



CoLP Capital Programme 2023/24

The detailed outturn vs budget and Q3 forecast by project is shown in table 2 below.

Table 2 - CoLP Capital Programme 2023/24	A	B	C=B-A	D	E=D-B	Notes
	2023/24 Project Budget £'000	2023/24 Outturn £'000	Variance: Outturn vs Budget £'000	2023/24 Q3 Forecast Outturn £'000	Variance: Outturn vs Q3 Forecast £'000	
FCCRAS	21,552	12,396	(9,156)	16,913	(4,517)	i
Cyclical Replacement – Mobile phone refresh	331	318	(13)	331	(13)	
- CoLP Training Facility	225	225	-	225	-	
- Other	17	-	(17)	-	-	
Data Analytical Platform Project (was Power BI)	435	-	(435)	5	(5)	ii
GAV	240	195	(45)	238	(43)	
Prioritisation and feasibility funding	1,000	173	(827)	171	2	iii
Horsebox	400	-	(400)	-	-	iv
Body Worn Video	119	36	(83)	49	(13)	v
CoLP Vehicle Replacement	397	329	(68)	332	(3)	
Forensic Network and Storage	257	161	(96)	149	12	vi
Covert Camera System	84	23	(61)	20	3	
Covert Surveillance Equipment	159	64	(95)	68	(4)	
Other prior year projects	-	(127)	(127)	-	(127)	vii
Child Abuse & Image Database (POCA)	20	7	(13)	7	-	
Armoury Improvements (SRP)	139	141	2	139	2	
Barbican Airwave Project (SRP)	30	27	(3)	27	-	
CoLP Forensic Storage (SRP)	12	8	(4)	8	-	
Total CoLP Capital Programme 2023/24	25,417	13,976	(11,441)	18,682	(4,706)	

CoLP Capital Programme 2023/24

Notes – on outturn variations to budget

- i. **FCCRAS:** The underspend of £9.156m is largely due to rephasing of milestone payments to 2024/25 because of the delayed go-live, from March to December 2024. Total project spend is forecast to be in line with the total budget of £30.986m.
- ii. **Data Analytical Platform Project** (was Power BI Phase 2): No spend was incurred in 2023/24 as the tender process was delayed until February 2024. The business case was approved at Strategic Change Board in April, and the spend will now be incurred in 2024/25.

Prioritisation and feasibility funding: £173k was spent in 2023/24. The balance of the £776k approved to progress the overarching management of change for CoLP, alongside the quick-time progression of some pipeline projects prior to their Gateway 2 attainment (Command and Control, Project Themis and E-Discovery) will be spent in 2024/25. The underspend was due to delays in the identification of suitable candidates and vetting, resulting in these resources not being employed in time to conclude their contracted days prior to the closure of the financial year. In addition, Project Themis has been delayed due to MPS re-evaluation of priorities and confirmation of delivery timeframes are still awaited.

- iv. **Horsebox:** There was a delay purchasing the horsebox due to the limited supplier selection nationally. The horsebox is now in the country and due for delivery in September/October 2024. It is anticipated that the full £400k will be spent in 2024/25.



CoLP Capital Programme 2023/24

Notes – on outturn variations to budget continued:

- v. **Body Worn Video:** Whilst the project went live on 26th September 2023, there was an underspend in 2023/24 of £83k largely due to change requests but this sum is expected to be fully spent in 2024/25.
 - vi. **Forensic Network and Storage:** These projects are now complete. Overall, there was an underspend of £96k, largely due to lower than anticipated hardware costs, reduced software costs and professional fees being lower due to the reduced complexity in the delivery of the initial projects.
- Other prior year projects:** The credit balance of £127,000 reflects a reduction to final project costs which have been charged in prior years.

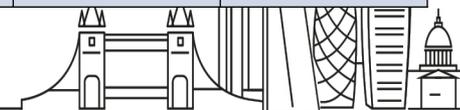
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Funding of the 2023/24 CoLP Capital Programme

Funding of the 2023/24 CoLP Capital Programme is shown in table 3 below.

Table 3 – Funding of the CoLP Capital Programme 2023/24	Outturn 2023/24 £'000	City Loan £'000	Home Office £'000	CoLP Revenue £'000	CoLP POCA £'000	City Fund £'000
FCCRAS	12,396	-	11,200	1,196	-	-
Mobile Phone Refresh	318	-	-	318	-	-
CoLP Training Facility	225	-	-	225	-	-
Other Cyclical Replacement	-	-	-	-	-	-
Data Analytical Platform Project	-	-	-	-	-	-
ICAV	195	-	-	195	-	-
Prioritisation & feasibility funding	173	-	-	173	-	-
Horsebox	-	-	-	-	-	-
Body Worn Video	36	-	-	36	-	-
Other 22/23 & earlier projects:						
Fleet Vehicle Replacement	329	-	-	155	-	174
Forensic Storage and Network	161	-	-	161	-	-
CoLP Covert Camera System	23	-	-	23	-	-
Covert Surveillance Equipment	64	-	-	64	-	-
Child Abuse & Image Database	7	-	-	-	7	-
Other prior year projects	(127)	(137)	-	10	-	-
Armoury Improvements (SRP)	141	-	-	141	-	-
Barbican Airwave Coverage (SRP)	27	-	-	27	-	-
CoLP Forensic Storage (SRP)	8	-	-	8	-	-
Total Outturn and Funding 2023/24	13,976	(137)	11,200	2,732	7	174



Corporation-led Projects benefiting CoLP

In addition to the CoLP-specific projects above, there are number of ‘infrastructure’ projects led and funded by the Corporation which will benefit Police – and which need to be managed as key elements of CoLP’s overall change planning process, in particular:

- Salisbury Square - £596m (of which the Police building is c.£220m and there are additional contributions towards the Range and Joint Command & Control Room)
- Future Police Estate - £60m additional funding allocated by Court in 2022 (primarily Eastern Base and rest of GYE plus IT, fit out and other costs)
- Secure City programme - £18m
- Enterprise Resource Planning (ERP) System implementation
- Future Network Strategy

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Committee(s): Professional Standards and Integrity Committee Police Authority Board	Dated: 4 June 2024 5 June 2024
Subject: Angiolini Inquiry- Part 1- CoLP Update	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Commissioner of Police Pol 69-24	For Information
Report author: D/Supt Carly Humphreys, Professional Standards, P&T	

Summary

On the 22nd November 2021, following the sentencing of Wayne Couzens the then Home Secretary addressed Couzens’ crimes and announced that she was launching an independent inquiry. The Angiolini Inquiry was commissioned as an independent, non-statutory inquiry. The Terms of Reference outlined the Inquiry’s investigative scope, which sought to establish a comprehensive account of the career and overall conduct of the killer of Sarah Everard, to identify any missed opportunities, and to make recommendations based on the findings.

On the 29th February 2024 Part One of The Angiolini inquiry was published¹, this addressed how Sarah’s killer was able to serve as a police officer for so long and seek to establish a definitive account of his conduct. The inquiry noted 16 recommendations, this report provides an initial response from the City of London Police to those recommendations, including the national position from the National Police Chiefs’ Council and the Government.

Part Two of the Inquiry will consider wider issues in policing in respect of policing and the protection of women. The Terms of Reference for this part of the inquiry have been agreed, however the publications for this and Part Three are unknown at this time. Following the sentencing of former police officer David Carrick in February 2023, Part Three of the Inquiry was established to examine Carrick’s career and conduct.

¹ [The Angiolini Inquiry – Part 1 Report \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

A review of these recommendations provides reassurance that the majority of those which are force-specific, are already either being delivered on or there is work underway to achieve the recommendation. Indeed, many of the recommendations relating to Vetting are welcomed as they support our own commitment in further professionalising the investigative approach within vetting and shared high standards in information exchange between forces and other agencies. We remain keen to understand a fuller position from the national recommendations and how we will need to support that at a force-level. In particular, the impact this will have on resourcing and finance to achieve what is agreed by national stakeholders.

Recommendation

It is recommended that Members note the report.

Main Report

I. Content and Findings (summary)

This report provides an overview on all of the 16 recommendations received from 'The Angiolini Inquiry Part One'. Please note that the recommendations are listed in a summary format for brevity but are outlined in full in [Annex A – The Angiolini Inquiry Part One, Recommendations in full](#).

A summary of the current position for the City of London Police, specifically regarding work already being delivered across each recommendation and where further work is required is outlined in this report.

Whilst it is accepted that the policing and public benefit of these recommendations must take precedence, some recommendations will present a resourcing and financial impact on the organisation, the ability to overcome these challenges is shared across forces and will be clearer as the national position develops. A number of recommendations, require joint work across the Home Office, Ministry of Justice, College of Policing and National Police Chiefs' Council, before they can be locally implemented.

II. National Position

The National Police Chiefs' Council have implemented governance arrangements to oversee policing's response to the 16 recommendations received from The Angiolini Inquiry, Part One. Monthly meetings will be held with national Chief Officer leads for thematic areas including: Violence Against Women and Girls, Equality, Diversity and Inclusion, Professional Standards & Ethics, Race Action Plan, Vetting, Chief Scientific Advisor for Policing, Culture and Communications.

This will be supported by a cross-sector group which brings together the NPCC, College of Policing (CoP) and Home Office to discuss as a whole the progress made against each recommendation.

We expect to receive updates from these groups in due course regarding the work being done against each recommendation, focusing in particular on the potential or existing barriers or challenges to delivery and providing direction to forces on how these can be addressed.

In March 2024, the Government accepted the recommendations made which place a requirement on the Home Office to work with the NPCC, CoP and other partners to understand the link between indecent exposure and an escalation in behaviour to ensure that the right measures are in place to catch more criminals earlier. The requirements of these national agencies are outlined alongside the force specific recommendations below.

III. City of London Police Progress on Recommendations

Recommendation 1: Approach to investigating indecent exposure

This recommendation requires all forces to ensure they have a specialist policy in place for investigating all sexual offences, including 'non-contact' offences, such as indecent exposure.

The City of London Police has this in place through oversight of all sexual offences being investigated within the Public Protection Unit (PPU), including 'non-contact' offences. This policy extends to ensuring the case is managed at the most specialist level with an officer trained in specialist sexual offences who also holds Professionalising Investigation Programme (PIP) level 2 accreditation.

Linked to operation Soteria, the transformation programme for Rape And Serious Sexual Offending (RASSO) within our CoLP Sexual Offences policy is subject of a review. This will align and support our work to implement the RASSO national operating model. Governance and delivery of this work is delivered by a cross-department project team led by the Specialist Operations Chief Superintendent with support from the CoLP Corporate Programme Office; recognising the need for a whole system approach to successful service delivery.

Recommendation 2: Guidance and training on indecent exposure

This is a recommendation for the College of Policing (CoP), in collaboration with the National Police Chief's Council (NPCC) to improve guidance and training on indecent exposure, in order to improve the quality of investigations and management of cases.

Although we await guidance from the CoP and NPCC on this matter. We have already assessed what training we currently provide and identified gaps in provision. Additionally, we are connected to regional and national groups linked to operational (Pursue, Prevent, Protect and Prepare) activity for sexual offending.

All student officers receive specific training on responding to sexual offences, including indecent exposure, this is part of First Responders Rape and Serious Sexual Offences Investigative Skills Development Programme (RISDP). The training programme is part of the CoP syllabus and also includes victim care. This course is currently being delivered across all operational areas of Specialist Operations, beginning with Public Protection, CID and Major Crime.

Recommendation 3: Treatment of masturbatory indecent exposure within the criminal justice system

The Home Office, Ministry of Justice, CoP and NPCC have been asked to conduct a fundamental review.

We await the results of this review and any resulting guidance.

Recommendation 4: Research into masturbatory indecent exposure

The Home Office in collaboration with CoP have been asked to commission research to establish if there is an evidence-based link between active masturbatory indecent exposure and subsequent contact offending.

We await the result of this and anticipate that any relevant findings will be used to shape national policy, training and guidance.

Recommendation 5: Public Information campaign on indecent exposure

By March 2025, the Home Office and NPCC should launch a public campaign to raise awareness and publicity surrounding the illegality, consequence of indecent exposure and to encourage reporting of unsolicited photographs sent of genitals with the intention to cause harm, distress or humiliation.

The CoLP Corporate Communications team are sighted on these recommendations and will support this public campaign through amplifying these messages across our organisation and communities.

Recommendation 6: Review of indecent exposure allegations and other sexual offences recorded against serving police officers.

By September 2024, the NPCC in collaboration with all force vetting units should review all allegations of indecent exposure and other sexual offences recorded on PND and PNC against serving officers.

A review has been completed and has concluded that there have been no allegations of indecent exposure linked to any CoLP officers, staff or volunteers following the Historical Data Wash results. We will be keen to work with the NPCC and other forces to establish an ongoing process to monitor PNC and PND submissions in real-time.

Recommendation 7: In person interviews and home visits

The CoP in collaboration with force recruitment should ensure that every new candidate applying to become an officer undergoes an in-person interview and home visit. This should be designed to provide a holistic picture of the candidate and a better understanding of the candidate's motivations for joining the police and their dedication to serving the public.

In person interviews have been in place for student officers since April 2023. These interviews are led by an officer of Sergeant or Inspector rank posted within Learning and Development, supported either by a member of the HR Team or another member of police staff within Learning and Development.

To perform home visits as one of the initial stages of the recruitment process, would prove a significant resourcing and potential budgetary challenge especially given the high attrition of student officers during the recruitment stage. Conversion is on a ratio of 1:10, so for every 10 applicants, only one will be successful. In CoLP, two student officer cohorts of 14 officers are run per financial year, necessitating 280 applicants to meet our student officer recruitment targets. Approximately 60% of this number do not pass the National Sift, Online Assessment Centre or interview stage, leaving 112 applicants for whom home visits would need to be carried out. The home visits would require dedicated resourcing, at this time it is unknown what the precise resource requirement would be. Due the demographic of our candidates and our location within the City, most of our candidates live outside of London meaning the time to travel to visit them would be greater than for other forces who recruit from closer residential areas.

Although we await national guidance on this process, to reduce some demand and financial pressure, one option would be to delay the home visit until further along in the vetting and onboarding process.

It is important conscious of the impact home visits may have on applicants from certain communities and groups which may deter them from applying, especially those from under-represented groups within which the force has struggled to recruit from previously. It will be important that this is managed and monitored carefully to minimise the impact on CoLP's ability to grow a diverse and inclusive workforce. It is also anticipated that some of these challenges will be discussed through the NPCC thematic areas of EDI, Police Race Action Plan, Culture and PSD during their oversight meetings.

National Guidance around the Integrity questionnaire and training for officers conducting the home visits would be essential to ensure this is standardised across all forces and what exactly the visits are designed to assess and against which framework.

Recommendation 8: Recruitment and vetting policy, processes and practices

By June 2024, the CoP in collaboration with force vetting units should take further steps to prevent those unsuitable for policing from joining the profession.

This recommendation particularly focuses on recruitment and vetting policy, processes and practice. Included in this recommendation is also a requirement for applicants to undergo an assessment of their psychological suitability of the role, including existing firearms officers. Our Occupational Health team is linked in with national leads and the CoP to ensure that any revisions to the medical recruitment guidance are evidence led. We also welcome further national guidance on the link between debt, mental health, vulnerability to corruption and suitability to be a police officer; to inform how we apply this within the new Vetting APP (Authorised Professional Practice).

We also welcome the updates to the new Vetting APP which supports our local decisions, already in place, to reject vetting applications of any individual with a conviction or caution for a sexual offence and to provide an information sharing agreement for vetting checks across armed forces.

Some aspects of this recommendation are already being delivered through existing HMICFRS recommendations, including the routine use of PND and PNC in all vetting applications. We also acknowledge the recommendation that no officer should be onboarded, even for initial training until all vetting has been completed.

Recommendation 9: Professional rigour in decision-making

By March 2025, the CoP in collaboration with force vetting units should take steps to improve the quality and consistency of police vetting decision-making.

We welcome this recommendation to enhance our own professional consistency but also to ensure that this standardised approach will ensure that there is an audit trail of effective decisions should an officer transfer forces.

Already, we have developed our vetting decision-making processes to ensure that they are structured and scrutinised. Our vetting officers will shortly receive bespoke interview training and be mentored by an experienced Counter Corruption Unit (CCU) officer to ensure that an investigative mindset is applied at all opportunities within the vetting process.

Recommendation 10: Vetting Code of Practice and transfers

With immediate effect, all recruiting forces should have regard to the new Vetting Code of Practice, which requires the parent force to provide all relevant information requested about the transferee to enable an effective assessment of risk by the force conducting a full re-vet of the transferee.

We are compliant with this recommendation and ensure that the new Vetting Code of Practice is followed to provide all relevant information requested about a transferee by the force conducting the vetting.

Recommendation 11: Information-sharing

By December 2024, the College of Policing in collaboration with force vetting and recruitment units, should ensure that information-sharing practices, including data retention policies, are strengthened in order to prevent those who commit sexually motivated crimes against women and those otherwise unsuitable for policing from remaining in, or moving across, the policing profession.

This requires a number of actions to be completed by CoP and force vetting units by December 2024, many of which we already adhere to as good practice. One area being that we notify the relevant home force of any vetting issues found within a transferee's application.

We welcome the proposed national 'shared referencing protocol' between uniformed services such as the Ministry of Defence, HM Prison service etc, to provide information regarding any past disciplinary or honesty/integrity issues.

Recommendation 12: Right to Privacy

With immediate effect, police forces should convey to all existing and prospective employees that they must be held to a higher standard of behaviour and accountability than members of the public.

L&D and PSD does convey to all existing and prospective employees that they will be held to a higher standard of behaviour and accountability than members of the public, and that therefore their right to privacy can be fettered in certain circumstances.

We do routinely ensure that these messages are disseminated through existing routes such as student officer and leadership days, professionalism newsletters, PSD working groups and ethical dilemma exercises, however we are working with our engagement officer to implement a more impactful communications strategy specifically to this recommendation.

Recommendation 13: Aftercare

By December 2024, the CoP in collaboration with force vetting units should develop a stronger approach to force vetting aftercare in order to monitor an individual effectively throughout their career.

Presently, the re-vet process is part of 'business as usual' within the unit and is largely reactive to a vetting renewal being identified. Where a concern has been raised regarding an individual's vetting, this would immediately be progressed through our vetting unit and, if required, our CCU. The vetting unit would require an additional resource to embed a dedicated 'aftercare prevent' team. This is a timely recommendation as the current vetting establishment is being reviewed to ensure that resourcing and capability can service all necessary demand.

Recommendation 14: Positive culture and elimination of misconduct or criminality often excused as 'banter'

With immediate effect, every police force should commit publicly to being an anti-sexist, anti-racist, anti-misogynistic organisation.

PSD take responsibility to communicate setting the standards and also our responsibility to intervene and take action when the standards are not met. The outcomes are disseminated out across the organisation through organisational learning and also misconduct publications.

The force's refreshed EDI Strategy is soon to be published and will clearly set out the force's position on building a truly inclusive and positive culture with zero-tolerance towards any forms of discrimination.

The Professionalism and Trust team have created a programme of 'Active Bystander' training which is being rolled out across the force to help give people the knowledge and confidence to call out behaviour which falls below our standards, including 'banter' specifically. We pride ourselves on being one of the first forces to deliver this training. Alongside, we also deliver modules for our 'Inclusivity Programme' where we invite key speakers to address issues including misogyny, racism and unconscious bias.

Again, this forms part of our Inclusivity Programme where attendance is being monitored and we have plans to ensure compliance.

Recommendation 15: Reporting by police officers and staff of harassment, sexual offences and inappropriate behaviour committed by fellow officers

With immediate effect, all police forces should take action to understand and confront the barriers that police officers and staff face when reporting sexual offences committed by a person they work with or in the workplace.

New processes within PSD ensure that any complaints of this nature are dealt with the highest standards. These are managed through the DCI who holds strategy meetings for all conduct matters relating to officer behaviours. These include ensuring that the investigation is appropriately resourced, operates in line with investigative policy, the victim is well supported and that any risk is appropriately and expeditiously managed.

The recommendation requires a dedicated reporting process for women in policing who experience inappropriate behaviour related to their gender. Although there are specific supported routes into PSD, the establishment a dedicated process is currently being reviewed and will require some engagement from our Network of Women Association and other groups to confirm the best approach.

Our Cultural Audit pilots have started this month to coincide with the publication of the staff survey results. The Cultural Audit will have two parts, the first will aim to identify elements of hidden culture, including low-level behaviour types which do not reach the misconduct threshold. The second will be a risk profiling exercise, to understand the scale and reach of the issues identified. Through understanding the culture, interventions can be put in place which help to create an inclusive and psychologically safe environment, where 'calling out' and reporting concerns is supported and encouraged.

Recommendation 16: Recruitment and retention of women in police forces:

By September 2024, the CoP and NPCC should review and examine the conditions of female officers and staff in order to encourage more women to join the police.

Although this is a national recommendation, this is a priority for CoLP within our People Strategy and our EDI Strategy. Our recruitment campaigns utilise specific webinars and 'buddy systems' for female candidates. Within the organisation, we have developed campaigns to advertise roles for part-time and flexible working, and also bespoke training and development for women seeking promotion and lateral development.

A Retention and Exiting Board looks to implement retention recommendations such as the National Leavers Framework and as part of this leavers data by demographic is examined to look for trends, opportunities to retain officers and staff and gain a much greater understanding of why people leave the organisation.

IV. Conclusion

The City of London Police has accepted the recommendations made to all forces. We also welcome the national improvements to be made through Vetting APP to enable us to be more robust across our police vetting processes.

We will continue work with our national partners and local departments to improve how we not only respond to masturbatory indecent exposure as a precursor to further sexual conduct, but also how we will continue to make strides to root out officers unsuitable for policing and to prevent the wrong people joining our force. We will also continue in the advances we have made to improve our culture through our inclusivity programme and the upcoming launch of our new EDI Strategy which will hold us to account for improving the experiences of women in policing and across our communities.

Progress against these recommendations will be led by Professionalism & Trust with monthly governance and oversight at CoLP's HMICFRS Operational Improvement Board, chaired by the Assistant Commissioner.

Background Papers:

[The Angiolini Inquiry – Part 1 Report \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Appendices

Appendix 1- The Angiolini Inquiry Part One, Recommendations in full

Author:

Carly Humphreys
Detective Supt PSD
Professionalism & Trust
City of London Police
Carly.humphreys@cityoflondon.police.uk

Appendix A – The Angiolini Inquiry Part One, Recommendations in full:

Recommendation 1: Approach to investigating indecent exposure

At the earliest opportunity, and by September 2024 at the latest, police forces should ensure that they have a specialist policy on investigating all sexual offences, including so-called ‘non-contact’ offences, such as indecent exposure.

Recommendation 2: Guidance and training on indecent exposure

By December 2024, the College of Policing, in collaboration with the National Police Chiefs’ Council, should improve guidance and training on indecent exposure, in order to improve the quality of investigations and management of indecent exposure cases. In particular, the College of Policing should:

- a. review and update training, informed by crime statistics and research into the nature of indecent exposure and its impact on victims;
- b. review and update the guidance for police officers to improve the handling of indecent exposure cases;
- c. include guidance on appropriate resourcing for investigations; and
- d. ensure that guidance and training reflect the Sentencing Council guidelines, which recognise factors indicating increased harm and culpability.

This activity should be informed by the results of Recommendation 4 below.

Recommendation 3: Treatment of masturbatory indecent exposure within the criminal justice system

With immediate effect, the Home Office, Ministry of Justice, College of Policing and National Police Chiefs’ Council should work together to conduct a fundamental review of the way masturbatory indecent exposure is treated within the criminal justice system. The review should focus on: recognising the seriousness of the offence; identifying it as an indicator of disinhibition by perpetrators; and understanding and addressing the wider issue of sexual precursor conduct so as to prevent victimisation, improve the response to victims when it occurs and bring more offenders to justice.

Recommendation 4: Research into masturbatory indecent exposure

With immediate effect, the Home Office, in collaboration with the College of Policing, should commission research to establish if there is an evidence-based link between active masturbatory indecent exposure and subsequent contact offending. Where relevant, findings should then be used to shape policy, training and guidance for police officers investigating indecent exposure cases (as per Recommendation 2).

Recommendation 5: Public information campaign on indecent exposure

By March 2025, the Home Office, together with the National Police Chiefs' Council, should launch a public campaign to:

- a. raise awareness about the illegality/criminality and legal consequences of any type of indecent exposure and boost the confidence of victims to report cases of indecent exposure to ensure that more offenders are brought to justice; and
- b. increase publicity around the relevant legislation in order to encourage reporting of unsolicited photographs sent of genitals with the intention to cause harm, distress or humiliation and to discourage perpetrators from doing so.

Recommendation 6: Review of indecent exposure allegations and other sexual offences recorded against serving police officers

By September 2024, the National Police Chiefs' Council, in collaboration with all force vetting units, and building on the results of the recent data-washing exercise, should conduct a review of the circumstances of all allegations of indecent exposure and other sexual offences recorded on the Police National Database and the Police National Computer against serving officers. This is to identify, investigate and ultimately remove those officers found to have committed sexual offences from all police forces.

Recommendation 7: In-person interviews and home visits

With immediate effect, the College of Policing, in collaboration with force recruitment, should ensure that every new candidate applying to become a police officer in any police force undergoes an in-person interview and home visit. This should be designed to provide a holistic picture of the candidate and a better understanding of the candidate's motivations for joining the police and their dedication to serving the public. In particular, this should include the following:

- a. An in-person interview with the candidate to ensure that face-to-face contact is made with the recruiting force before the vetting or onboarding of the candidate is progressed.
- b. A visit to the residence of all new candidates. This should be used as another opportunity, in advance of vetting enquiries, to engage with the candidate, relevant family members or other occupants of the residence, wherever possible.
- c. An integrity questionnaire, used as part of the in-person home visit, to explore fully the candidate's personal attitudes and values, including increased scrutiny of the candidate's motivations and suitability for joining the police.
- d. Corresponding guidance and training for home visits must be developed to ensure that the visits will enable a better sense of the candidate's character, rather than judge living arrangements or socio-economic status.

Recommendation 8: Recruitment and vetting policy, processes and practices

By June 2024, the College of Policing, in collaboration with force vetting units, should take further steps to prevent those unsuitable for policing from joining the policing profession. This should include further developing the Vetting Code of Practice, Authorised Professional Practice on Vetting, and other guidance on recruitment and vetting practices in order to prevent those who commit sexually motivated crimes against women and those otherwise unsuitable for policing from holding the office of constable. In particular, recruitment and vetting policy, processes and practices must be developed in the following areas:

- a. Applicants should be required to undergo an assessment of their psychological suitability for the role (which is not just a questionnaire).
- b. There should be more robust use of the Police National Database during vetting, including as a tool to reveal unreported adverse information about applicants to ensure that potential risks are not missed. In particular, the Database should be used when individuals attempt to move between forces.
- c. Any individual identified as having a conviction or caution for a sexual offence should be rejected during police vetting. This should be clearly outlined in the Vetting Code of Practice and reflected in the Authorised Professional Practice on Vetting, which should consider all contact and non-contact sexual offences.
- d. The Authorised Professional Practice on Vetting should be amended to make it clear that military and/or Ministry of Defence checks should be carried out on all applicants who have served as military reservists.

- e. There should be a fundamental review of the link between debt, mental health, vulnerability to corruption and suitability to be a police officer, to inform vetting decisions. Detailed consideration should be given to the amount of unsecured personal debt held by officers, and rules should be amended to mandate officers to report any significant changes in debt to vetting teams. In addition, the rules should require applicants and officers to provide further insight into their finances, including any payday loans, when requested during the vetting process.
- f. There should be increased rigour in relation to checks for authorised firearms officers, to ensure that vetting standards are met, as well as the introduction of a psychological assessment and an appropriate process for seeking feedback from supervisors or line managers to determine suitability for the role.
- g. No police officer should be onboarded, even if only for initial training, before all vetting is complete. In addition, each officer's force vetting should be completed before their National Security Vetting is initiated. All force vetting information should be passed to National Security Vetting officers for consideration.

Recommendation 9: Professional rigour in decision-making

By March 2025, the College of Policing, in collaboration with force vetting units, should take steps to improve the quality and consistency of police vetting decision-making. This should include encouraging the use of greater professional rigour and curiosity when investigating lines of enquiry, in order to prevent those who commit sexually motivated crimes against women and those otherwise unsuitable for policing from joining the policing profession. These steps should include the following:

- a. Recruiting forces should be able to request that unresolved allegations discovered during vetting processes be reinvestigated.
- b. In collaboration with the National Police Chiefs' Council, a national vetting capability should be created, as an advisory function, to provide another layer of confidence in instances where complex vetting investigations and decisions are required. In such cases, forces should approach the national vetting function to seek proposed lines of enquiry and ensure that they are following an agreed, standardised approach when considering complex cases.
- c. Consideration should be given during vetting to any information or intelligence about police officers being reported missing, regardless of how quickly such reports were closed.

- d. Forces must ensure that force vetting units are complying with and practising Section 6.2 of the College of Policing Authorised Professional Practice on Vetting (2021), which states that force vetting units “must record the results of vetting enquiries; the rationale for refusing, suspending, withdrawing or granting clearance, including with restrictions; and where adverse information has been revealed and considered”. This is to ensure that an audit trail is recorded to give the force confidence in decisions made at the time and to allow future vetting officers to constructively scrutinise vetting enquiries and outcomes.

Recommendation 10: Vetting Code of Practice and transfers

With immediate effect, all recruiting forces should have regard to the new Vetting Code of Practice, which requires the parent force to provide all relevant information requested about the transferee to enable an effective assessment of risk by the force conducting a full re-vet of the transferee.

Recommendation 11: Information-sharing

By December 2024, the College of Policing, in collaboration with force vetting and recruitment units, should ensure that information-sharing practices, including data retention policies, are strengthened in order to prevent those who commit sexually motivated crimes against women and those otherwise unsuitable for policing from remaining in, or moving across, the policing profession. In particular, there should be a focus on the following information:

- a. Previous failures to achieve vetting should be recorded by all forces and flagged to recruiting forces. This should also trigger a re-vet with the current or recruiting force.
- b. A shared agreement should be made about the quality, relevant and necessary content, and sources of information that will be provided in a reference for a future force, also known as a ‘shared referencing protocol’, with directed questions that must be answered (for example, regarding any past disciplinary or honesty/integrity issues). Information to be shared as part of the protocol should be covered within the relevant forces’ fair processing notices. The protocol should apply to all transfers and applications to police forces from individuals in the uniformed services, including:
 - the Ministry of Defence (including the Army, the Royal Air Force and the Royal Navy, as well as their respective reserve forces);
 - fire and rescue services;
 - HM Prison and Probation Service;
 - other police forces; and

- relevant government agencies, such as Border Force or Immigration Enforcement.

This is to improve forces' access to – and ability to use – the totality of information they hold about officers in order to prevent, detect and deal with those likely to commit offences.

- c. As per Recommendation 8(b), there should be expanded access to and use of the Police National Database, including as a tool for revealing relevant uninvestigated adverse information about officers.
- d. Any adverse information or intelligence (developed or otherwise) should be passed by the current Professional Standards Directorate to the receiving Professional Standards Directorate for any officers transferring. No decisions on their appointment should be made until that intelligence has been reviewed, recorded and closed and the vetting units have had time to consider it. If the recruiting force identifies adverse information as a result of the vetting process, this should be shared with the current force for consideration and potential action.

Recommendation 12: Right to privacy

With immediate effect, police forces should convey to all existing and prospective officers and staff that they must be held to a higher standard of behaviour and accountability than members of the public, and that therefore their right to privacy can be fettered in certain circumstances. These circumstances include, but are not limited to: recruitment, vetting, aftercare, transfer, promotion, role change, returning to policing and maintaining standards. This is to ensure that members of the police are fully aware and accountable for the unique powers entrusted to them and the standards of professional behaviour they swear to uphold. Updated fair processing notices concerning changes to processing of personal data should be provided prior to any new processing taking place, including data-sharing.

Recommendation 13: Aftercare

By December 2024, the College of Policing, in collaboration with all force vetting units, should develop a stronger approach to force vetting aftercare in order to monitor an individual effectively throughout their career with the police and be aware of any change in circumstances as soon as possible to ensure that potential risks/red flags are identified and assessed. In particular, that approach should include the following:

- a. Mandatory, randomised re-vetting should be introduced, as an additional layer to standardised vetting periods, for police officers and staff, akin to randomised drug-testing.

- b. In addition to police officers and staff being required to declare any material changes in their circumstances within a managed system, such as a human resources system, supervisors, or anyone with concerns relating to behaviour, welfare or performance, should report them to Professional Standards Departments at any point.
- c. Professional Standards Departments should systematically exchange relevant and necessary information with vetting and counter-corruption units to consider information disclosed by any individual, and any action necessary.

Recommendation 14: Positive culture and elimination of misconduct or criminality often excused as 'banter'

With immediate effect, every police force should commit publicly to being an anti-sexist, anti-misogynistic, anti-racist organisation in order to address, understand and eradicate sexism, racism and misogyny, contributing to a wider positive culture to remove all forms of discrimination from the profession. This includes properly addressing – and taking steps to root out – so-called 'banter' that often veils or excuses malign or toxic behaviour in police ranks.

Recommendation 15: Reporting by police officers and staff of harassment, sexual offences and inappropriate behaviour committed by fellow officers

With immediate effect, all police forces should take action to understand and confront the barriers that police officers and staff face when reporting sexual offences committed by a person that they work with or in the workplace. This is in order to encourage victims, who are also police officers or police staff, to come forward and submit complaints, as well as to identify and remove those who are not fit for service. To do this, forces should:

- a. ensure, when a complaint is made, that sufficient and appropriate resources are dedicated to supporting the complainant, including maintaining anonymity where needed or requested, and ensuring an investigation is carried out as appropriate;
- b. address cultural barriers to reporting, such as re-victimising complainants by labelling or treating them as 'troublemakers'; and
- c. provide dedicated reporting processes for women in police forces who experience inappropriate behaviour related to their gender.

Recommendation 16: Recruitment and retention of women in police forces

By September 2024, the College of Policing and the National Police Chiefs' Council should review and examine the conditions of female officers and staff in order to encourage more women to join the police and progress in policing careers. To ensure success, this should include a review of:

- a. working conditions that do not address the realities of modern working lives, including families where both parents are officers and share caring responsibilities;
- b. processes, training and refreshers for officers returning from parental leave; and
- c. kit, equipment and facilities designed largely by and for men.

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Committee(s): Professional Standards and Integrity Committee	Dated: 4 June 2024
Police Authority Board	5 June 2024
Subject: Equity, Diversity, Inclusivity (EDI) Update	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	CoLP impact the following Corp Plan outcomes: Vibrant Thriving Destination- (Community Safety/ CT) Dynamic Economic Growth- (National Lead Force)
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Commissioner of Police Pol 70-24	For Information
Report author: D/Supt Kate Macleod, Professionalism and Trust	

Summary

Internally, the launch and subsequent delivery of our Equity Diversity and Inclusion (EDI) Strategy and refreshed governance framework remain a priority, with much activity taking place this month. We also continue to deliver against our own internal actions plans as well as Nationally driven reporting- a separate paper on your agenda has been produced to address the recommendations from the Angiolini Inquiry.

A range of modules have been produced as part of the new series of offerings under our Inclusivity Programme, the first of these is an anniversary event celebrating the Programme- 1 year on. Being attended by our Commissioner along with guest speakers on EDI, we will also use this as a soft platform to talk about our new EDI Strategy.

Competing action plans and priorities across a number of EDI areas continue to place additional demand however our resourcing levels are now improved with an additional temporary EDI Manager and PC now in place, this will be complemented further by the addition of a Chief Inspector later this year.

Internal Updates

EDI Strategy

We continue to work to our scheduled timetable for delivery of the Strategy, holding consultation sessions and regular updates in the interim with a final draft to be

agreed by mid-June. The draft Strategy has been submitted to the last 3 Professional Standards and Integrity Committees for Member comment and so it will be next be submitted to the Police Authority Board in July.

A Communication Plan has been produced which includes a short animation and video of our own people talking about what the new strategy means for them.

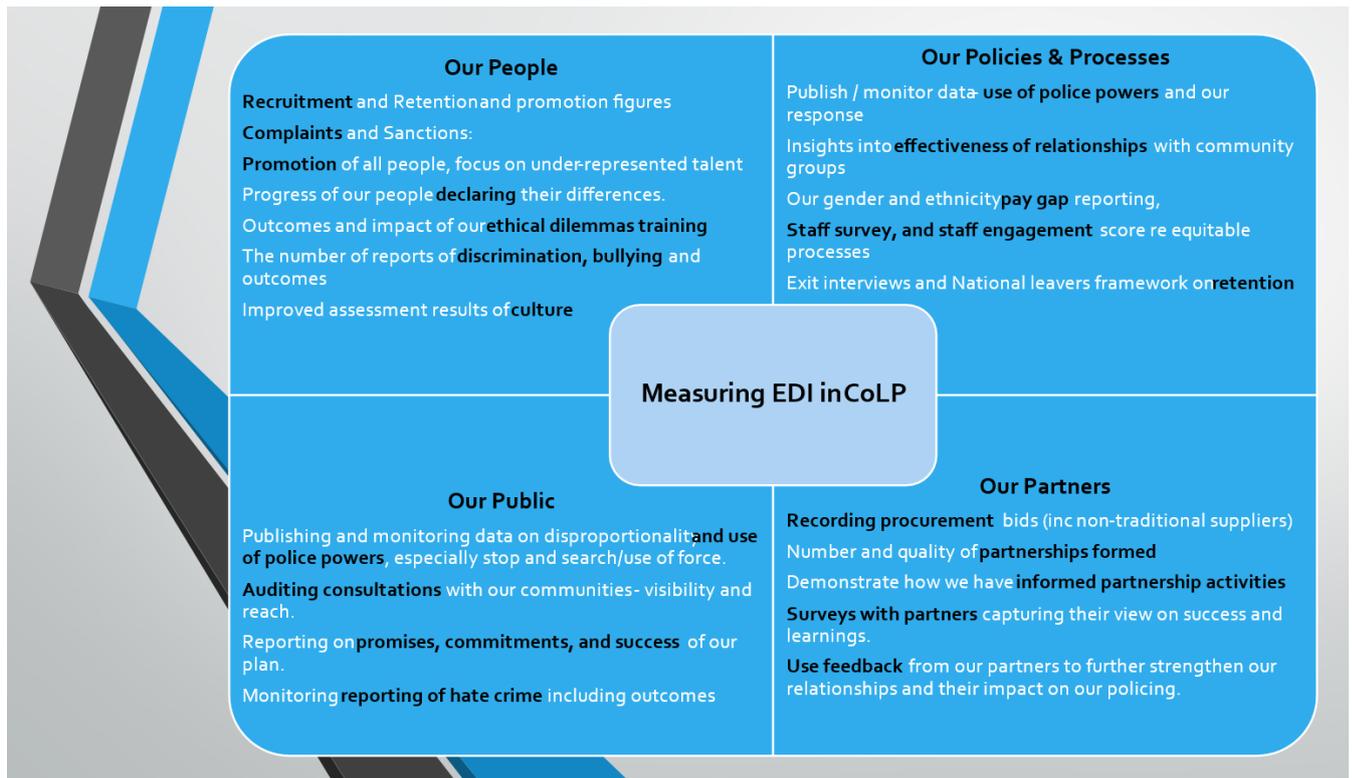
An event is planned for 27th June which will be a celebration of our Inclusivity Programme one year on, this will be attended by Chief Officer Team members with representation from the Corporation, along with those who sign up from our own teams. The purpose is primarily to celebrate the Programme, including the people who have participated in the sessions, and achievements to date. It will include an overview of past and future events, but will also be interactive to check our awareness and next steps. Although it will not be advertised as such, the day will be a spring launch for the new Strategy and an opportunity to test key judgements.

EDI Governance & Accountability

We have presented proposals for our new EDI governance structure to members of our Networks, Staff Associations and relevant Board Members. The changes represent a shift away from a slightly cluttered landscape which required improvement in accountability and measurement, and towards ensuring we are streamlining our processes and checking ourselves against the new Strategy. The full slide deck summarising these proposals can be found at Appendix A.

It is imperative that our EDI governance mechanisms are aligned to our strategy, we need to be able to readily demonstrate the progress we are making against the promises we have made, but also quickly identify areas where such progress is lacking. Dashboards will form a key part of future EDI Strategic Boards, ensuring that we are effectively monitoring our progress and holding our people accountable. The EDI Strategic Board will in turn direct our EDI Operational Board, ensuring that actions given are realistic and achievable.

Dashboards will be produced for each of the '4P' areas, they will provide a picture of our current position along with measurable changes over time. The slide below provides proposed measurements which are being considered for inclusion:-



In addition to our new EDI Strategy, we will also be using this board to keep track of progress made on our localised Police Race Action Plan, our Violence Against Women and Girls Action Plan (including White Ribbon commitments), our Business Disability Forum (BDF) action plan and our other EDI workstreams as assigned by National Police Chief's Council (NPCC).

Inclusivity Programme

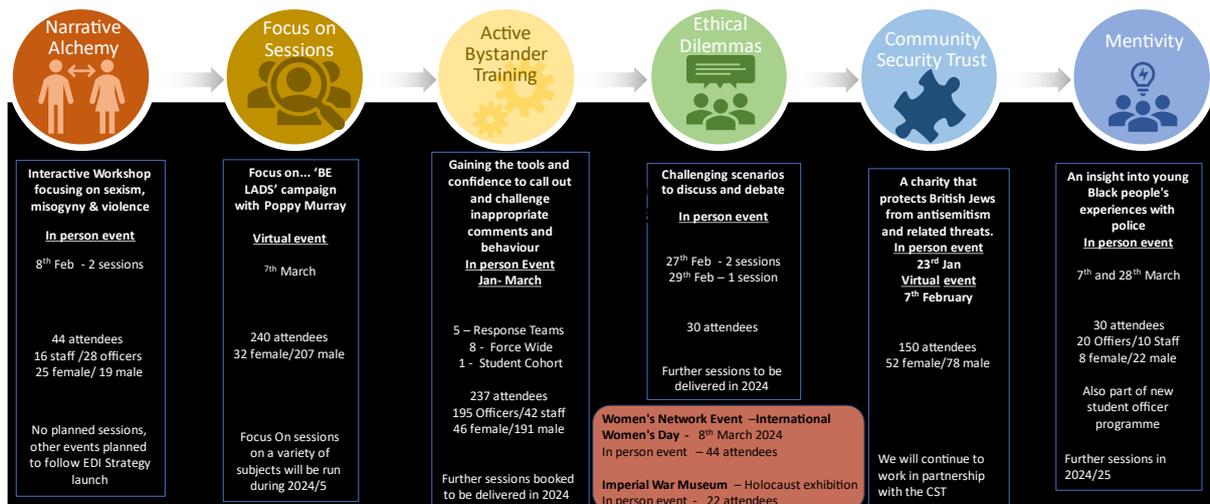
Incorporating feedback from Members, we have now produced our second evaluation of our Inclusivity Programme, the full document can be found at Appendix B. At the behest of Members, we have included an additional slide providing more narrative of what the modules entail.

A reminder that this programme is an attempt to deliver awareness training for all of our Officers and Staff across areas of EDI, moving away from a 'tick a box' one-off classroom delivery, to a flexible programme of modules from which people can attend depending on their learning style and knowledge gap. We continue to focus on providing training which also aids practical policing, equipping officers and staff with skills to help them be better at their jobs. Over the last period, the Inclusivity, Culture and Organisational Development (ICOD) team has delivered as follows:-

- 775 places on Inclusivity Programme modules have been taken between January and March of this year.
- Between October and March, we know that a total of 2,038 places have been taken. Approximately 1,620 employees are eligible to undertake a module and the requirement remains that everyone should complete a module every 6 months, or 2 a year, as minimum.

- All sessions have received a 100% score for ‘would you recommend’ with the exception of 98% for theatre workshops.
- Evaluation has focused on ‘why did you sign up’ and ‘what did you learn’, this will be explored more with interactive elements of event on 27th June 2024
- The qualitative feedback again provides real value, some of these quotes are being utilised in the production of our EDI Strategy.
- Next steps form part of our wider governance i.e. ensuring that we measure the impact that these sessions are having across the ‘4P’s of our strategy.

Our People - Inclusivity Programme modules – Jan – March 2024



Key issues, risks, and mitigations

Demand

A number of important pieces require immediate attention in the EDI space internally, including our Strategy launch (with accompanying wider governance) and our submission to Inclusive Employers; externally pressures abound with new versions of both Race and Violence Against Women and Girls Action Plans, necessitating a review and re-alignment of our existing plans. Analytical support has been requested internally as we proceed to the creation of dashboards and measuring our ambitions.

A new Strategy- So What?

Addressed throughout this paper, there is a cultural risk around our new EDI strategy launch and it simply not ‘landing with impact’. Our Chief Officer Team understand the importance of getting this right and making tangible differences that people can live and feel, not just read about.

This is evident in our launch and Comms plans, where we will use the event at the end of this month to talk about actual progress made and next steps, making this an interactive session. We will also be expecting our Senior Leadership Team

to step up and make pledges in this space, which will be displayed on the day with a promise to follow up one year on. Once our new governance is in place and in a bid to be more transparent, we also have plans to produce a regular EDI update infographic, showing our people what has been discussed at board level, actions pledged and timeframes. Finally, a number of future modules have been planned and will be ready for advertising at the same time, thereby acting as 'hooks' for the strategy which have actual policing benefit, see table below:-

Date	Title	Content
25th June	Focus on LGBTQ+ Sexual Orientation	This will explore • What police need to know- Terminology • What is sexual orientation • What it means to be a part of the LGBTQ community • What the letters and + represent • LGBTQ+ people through history • The historical experience of LGBTQ+ people in the UK
27th June	Anniversary Event celebrating Our Inclusivity Programme: 1 year on	Celebrating the one year anniversary of Our Inclusivity Programme, participants are invited to attend one of two sessions taking place in Classroom 1 at New St. Attendees will hear from guest speakers about personal journeys and success stories, Chief Officer/s will present on our new EDI Strategy and what this means.
3rd July	Focus on Transgender	An opportunity to hear a personal story from a well-known Trans actress who will talk about the challenges she has faced from her childhood through to her professional life.
25th July	Focus on Gender Identity	What is gender? What does gender identity mean? How do we talk about gender openly and inclusively? This webinar aims to discuss the basics of gender, gender identity and gender expression to clear up some misconceptions and give you the confidence as Officers and Staff to approach conversations with knowledge and understanding.
August TBC	Focus on Anti-Muslim Hate	To be provided by TellMama, dates to be confirmed
Summer TBC	Equality Impact Assessments	Practical input from College of Policing on how to complete EIAs in force, helping us to perform better and provide a better service to our community through properly considering EDI as part of our operational engagement.
10th Sept	Joint event with PWC celebrating LGBTQ+ & Parenting	Following successful session delivered by PwC, an opportunity for us to work together and replicate for our own organisation.
26th Sept	Focus on Violence Against Women and Girls in the City	An opportunity to update our people on work being undertaken in this area- including local policing initiatives (Op Reframe, Walk & Talk, Ask for Angela) and Head of Crime re relentless pursuit. With guest speakers.
Various	Ongoing inputs- Mentivity (impact of police use of force on black communities), Active Bystander, Ethical Dilemmas.	

Notable national issues and developments

National Police Race Action Plan (PRAP)

Deputy Assistant Commissioner Dr Alison Heydari is the Programme Director for the Police Race Action Plan, in recent communications she has made it clear that the Plan is here for the long term:- 'this work can and must continue to drive the meaningful change we need'. In the next two months, it is expected that the National team will release their new version of the plan, this will include a framework which reflects a commitment to change and a proposal for future delivery plans. Locally, we will need to incorporate these changes as appropriate, appreciating we have only recently launched our localised version of the plan and agreed ownership for the 13 priority areas.

Violence Against Women and Girls

In March this year, a refreshed Violence Against Women and Girls National Framework for Delivery was launched, along with a self-assessment tool to help forces measure delivery against local Violence Against Women and Girls action plans. The National Police Chiefs' Council (NPCC) Violence Against Women and Girls taskforce has agreed that forces are required to complete the self-assessment tool attached to the Violence Against Women and Girls Framework for Delivery for 2024-2027 for HMICFRS as well as the ongoing self-assessment forms for Operation Soteria. Locally, we also need to complete our White Ribbon Action Plan; we have ensured all items will be on the agenda for our new EDI Boards and progress will be monitored.

National Changes EDI NPCC and College

Following discussions between Chief Officers of the College and EDI NPCC leads, the decision has been made to cease the EDI consortium meetings and replace them with regional meetings, led by the respective Senior Culture and Inclusion Adviser for that area. These meetings will then feed in to the 'DEI-LN' ('Leadership Network) meetings which take place quarterly. We are told that EDI leads from forces will be contacted by their advisers in the near future to arrange a date for the first meeting which will be held online, CoLP are linked in via relationship with National Portfolios and the College.



A senior EDI delegation from the College of Policing visited our force on 25th April, we spent a day updating them on our workstreams (including an input from T/Commissioner Pete O'Doherty and took advantage of the opportunity to check our progress on EDI themes and our future plans.

Forward look

Staff Survey and Cultural Audit

Our cultural audit aims to uncover elements of hidden culture which impact on how people feel at work (low level type of behaviors not reaching misconduct). It also includes a 'risk profiling' exercise, to understand the scale and reach of the issues identified. Through understanding the culture, interventions can be put in place which help to create an inclusive and psychologically safe environment, where 'calling out' and reporting concerns is supported and encouraged.

Since last reporting, the pilot phase has begun, with focus sessions taking place with the workforce over this period (April-June '24). Initial feedback has been strong, with participants referring to the force acting upon staff survey results as refreshing. The delivery plan timeframe allows for the analysis phase to begin later this month with reporting commencing in late July/August.

Code of Ethics

The Code of Practice launched on the 24th January 2024, at the previous meeting a report was presented which described how this puts a responsibility on Chief Officers to ensure openness and candour within their force and includes a range of issues which Chiefs should consider when doing this. In force, we have an agreed delivery plan being led by a T/Commander, this supports the implementation of the code and its principles throughout the organisation, to improve the service provided to communities, as well as creating workplaces promoting inclusion, dignity and respect.

As are aware that HMICFRS will include the Code of Ethics as part of their inspection programme in 2025, we are making use of the College Culture and Inclusion Teams to support us in making the most of these opportunities. We have also made online College of Policing modules mandatory for all and will be reporting compliance data through our internal governance.

Sponsorship Programme

This launched in April following our work consulting with NHS National Finance Academy, who have run a programme for 4 years, and our external consultant volunteers. Two briefings have been delivered to potential sponsors and those being sponsored (Black and Asian officers and staff), covering: What is Sponsorship? Benefits to sponsor/those being sponsored and the wider organisation, why we are focusing on Black/Asian colleagues (initially), and next steps. By early this month we will have completed profiles for all interested parties and ICOD colleagues will have completed initial matching and 'chemistry' meetings. CPD events are being arranged once pairings are established and workbooks being prepared.

Inclusive Employers Accreditation

The window for submissions to Inclusive Employers is now open, closing on 28th June 2024. We have produced a comprehensive plan to ensure we are gathering our best evidence from across all directorate areas in ample time to properly review our submission, we aim to improve our rating on their Maturity Model from 'compliant' back in 2020 to at least 'established'. This target area is defined by Inclusive Employers: 'We actively promote diversity and inclusion and the business case, making sure it's a regular and established part of what we do'. It is not clear when results will be available but based on discussions and last year's timetable, they are anticipated for release around September 2024.

Kate MacLeod

Detective Supt

Professionalism and Trust

Kate.macleod@cityoflondon.police.uk

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(Appendix A)

EDI Governance- Proposal

April 2024

Professionalism & Trust Portfolio

Directorate Head

T/Chief Superintendent Sanjay Andersen

**Inclusivity, Culture, &
Organisational Development
(ICOD)**

Learning & Development (L&D)

**Professional Standards
Department (PSD)**

Head of ICOD
Detective Supt Kate MacLeod

Director of PSD
Detective Supt Carly Humphreys

ICOD
Chief Inspector Jason Selvarajah

Head of L&D
Chief Inspector Dan Murphy

Det Chief Inspector Amanda Lowe

Ian Younger (F)

Summary of Proposals

- Re-alignment of terminology- 'Equity, Diversity and Inclusion'
- Creation of a two-tier governance approach (EDI Strategic Board and EDI Delivery Board)
- CoT to accept terms of reference for EDI Strategic Board and EDI Delivery Board (for onward consultation at inaugural meetings)
- Discontinuation of Renewing and Rebuilding Trust and Confidence (RRTC) Board
- Driving our EDI strategy through dashboards and action feeds.
- Ensuring updated attendee lists to ensure prioritisation by Chief Officers and include more external scrutiny

EDI Strategic Board- Overall Ambition

“The Equity, Diversity & Inclusion Strategic Board is the formal governance to ensure that CoLP is delivering its EDI strategy, including its legal obligations under the Equality Act and our ‘4P’ ambitions as a force”



EDI Strategic Board- Purpose

Understanding
Disproportionality-
Our Public and
Communities

Understanding
Disproportionality-
Our Officers and
Staff

Maximising Best &
Effective Practice

Delivering
excellence through
our action plans

Identifying and
Mitigating Risks

Driving Creativity
and Innovation

Evolving the right
Culture and
Leadership

Ensuring effective
communication
and engagement

Enabling finances
and resource

EDI Strategic Board- Attendees

INTERNAL

- Commissioner (Chair)
- Chief Officer Local Policing
- Chief Officer Specialist Operations
- Chief Officer Corporate Services
- Chief Officer National Lead Force

- Head and Deputy Head Professionalism & Trust
- Head of Human Resources
- Head of Professional Standards Directorate
- EDI Manager
- Head of Communications and Engagement

- Network Representation (elected or on rotating basis)
- BPA Representation (due to focus on PRAP)
- NoW Representation (due to focus on VAWG)
- Federation Representation
- Union Representation

EXTERNAL

- Corporation Representation
- IASG Chair or elected member
- Representation from Business Community / Chamber of Commerce
- HMICFRS / IOPC representation

EDI Strategic Board – Proposed Agenda Items

- Apologies for absence

- Minutes

- Risk Register & Actions outstanding

- High Level verbal update of EDI Delivery Board

Our People dashboard (Measures as per EDI Strategy- RAG rated)

Our Public dashboard (Measures as per EDI Strategy- RAG rated)

Our Processes & Policies dashboard (Measures as per EDI Strategy- RAG rated)

Our Partners dashboard (Measures as per EDI Strategy- RAG rated)

VAWG dashboard (Exceptions / 3 critical areas)

PRAP dashboard (Exceptions / 3 critical areas)

SNA Representative (Exceptions / 3 critical areas)

Communication & Engagement Overview (including forward look calendar)

AOB

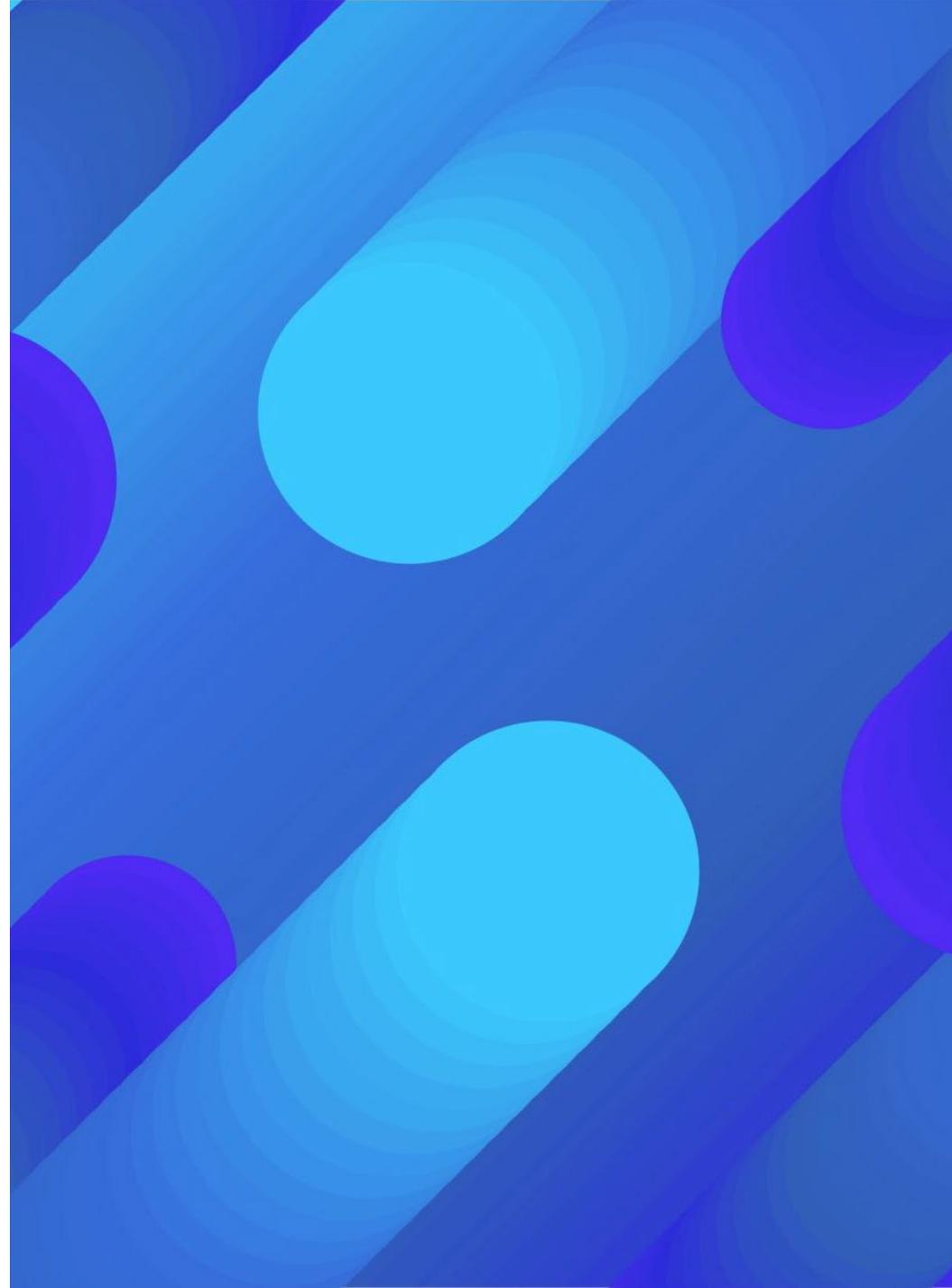
EDI Strategic Board - Key Points



Overall Ambition- EDI Delivery Board

Page 121

“Delivering equity, diversity and inclusion for the public we serve and the people we lead, helping the EDI Strategic Board meet its obligations”



EDI Delivery Board - Purpose

Page 122

Delivering our promises on EDI workstreams (including VAWG and PRAP)

Enabling the conditions to allow the right culture and leadership to evolve

Becoming an employer of choice

Providing an excellent service to the public

EDI Delivery Board- Attendees

- INTERNAL
 - Head of Professionalism & Trust (Chair)
 - Head of Inclusion, Culture and Organisational Development
 - E&I Manager

 - Workstream Lead Recruitment & Onboarding HR
 - Workstream Lead Retention & Exiting NLF
 - Workstream Lead Community Engagement LP
 - Workstream Lead Leadership & Culture NLF
 - Senior representation from other Directorates (SO)

 - Network Representation (all networks)
 - Federation Representation
 - Union Representation

 - Head of Professional Standards Directorate
 - Head of Communications and Engagement
 - Head of Finance
- EXTERNAL
 - Corporation
 - IASG

EDI Delivery Board - Key Points



EDI Delivery Board Proposed Agenda items

- Apologies for absence

- Minutes

- Risk Register & Actions outstanding

- High Level verbal update of EDI Strategic Board

- Assigning new actions arising from EDI Strategic Board

PRAP Update (Exceptions / 3 critical areas / red or amber only)

VAWG Update (Exceptions / 3 critical areas / red or amber only)

Workstream Update- Recruiting and Onboarding (Exceptions / 3 critical areas)

Workstream Update- Retention and Exiting (Exceptions / 3 critical areas)

Workstream Update- Community Engagement (Exceptions / 3 critical areas)

Workstream Update- Leadership & Culture (Exceptions / 3 critical areas)

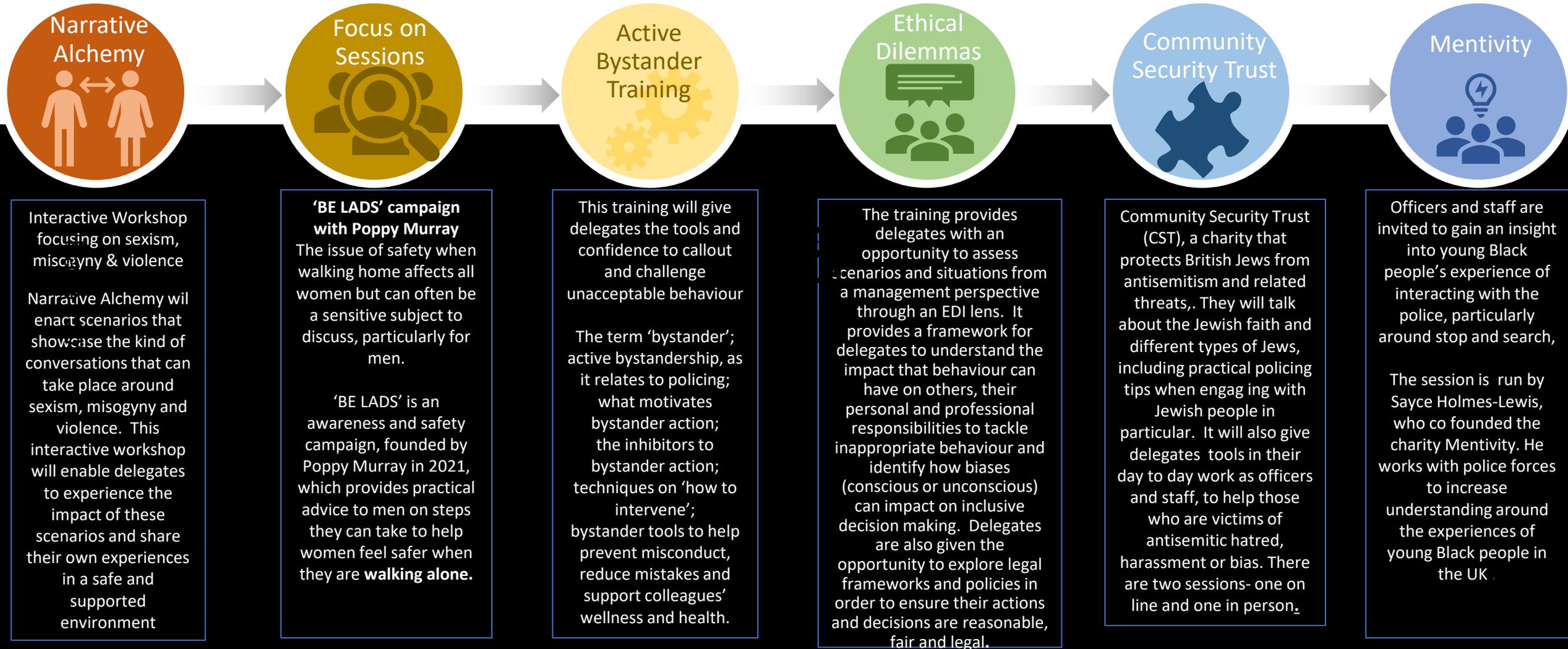
SNA Updates (New reporting template, critical areas of risk only)

Communication & Engagement

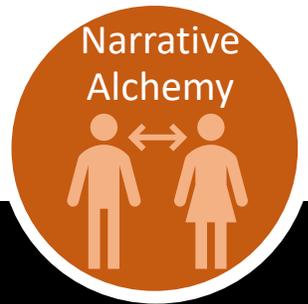
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Our People - Inclusivity Programme modules – Jan – March 2024



Our People - Inclusivity Programme modules – Jan – March 2024



Interactive Workshop focusing on sexism, misogyny & violence

In person event

8th Feb - 2 sessions

44 attendees
16 staff /28 officers
25 female/ 19 male

No planned sessions, other events planned to follow EDI Strategy launch



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

Virtual event

7th March

240 attendees
32 female/207 male

Focus On sessions on a variety of subjects will be run during 2024/5



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

In person Event
Jan- March

5 – Response Teams
8 - Force Wide
1 - Student Cohort

237 attendees
195 Officers/42 staff
46 female/191 male

Further sessions booked to be delivered in 2024



Challenging scenarios to discuss and debate

In person event

27th Feb - 2 sessions
29th Feb – 1 session

30 attendees

Further sessions to be delivered in 2024

Women's Network Event –International Women's Day - 8th March 2024

In person event – 44 attendees

Imperial War Museum – Holocaust exhibition

In person event - 22 attendees



Community Security Trust

A charity that protects British Jews from antisemitism and related threats.

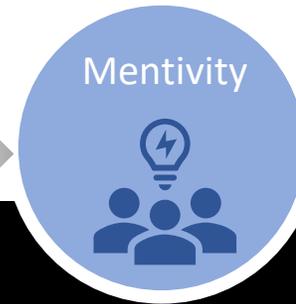
In person event

23rd Jan

Virtual event
7th February

150 attendees
52 female/78 male

We will continue to work in partnership with the CST



Mentivity

An insight into young Black people's experiences with police

In person event

7th and 28th March

30 attendees
20 Officers/10 Staff
8 female/22 male

Also part of new student officer programme

Further sessions in 2024/25

Narrative Alchemy



98% stated they would recommend this module to others

Why did you sign up?

3% PDR requirement

Reflect on behaviour and seek change

It sounded interesting and I wanted to hear new approaches to challenging situations

The approach sounded interesting.

It was an interesting subject

The approach sounded quite novel and interesting. Also as a HeForShe ally, driving changes towards gender equality, the theme was of particular interest to me.

Topic was relevant

I attended a previous session many years ago with this company and found the input very good



What did you learn?

Reflect on behaviour and how comments can be viewed from other perspectives

The usefulness of stories - I work in training.

Everyone is affected differently

Different types of sexism and the different forms of violence

Sexism can be more than just direct easily identified behaviour

I learned that men can also be subjected to sexism by women.

Usefulness of honesty and challenging pre-conceptions.

To differentiate between sexism

We have considered the feedback and would like to develop more theatrical workshops in future; nothing planned presently due to alternative priorities and time / planning involved

Focus on



BE LADs with Poppy Murray

100% stated they would recommend this module to others

Why did you sign up?

1% PDR requirement

To enhance my understanding on how to make a safer environment for women both in and out of work

Wanted to know more about what I can do to help females feel safe.

Really interested to hear about the BE LADs initiative

To be a better manager

I have always considered this a problem since I started socialising as a teenager, really good to learn about it

As I get older I am more and more aware of the possible stress and discomfort I may have been causing. I was incredibly relieved to see that Poppy had put together a relevant, comprehensive and teachable package.

What did you learn

I will definitely look at females safety as a priority and identify any unacceptable behaviour which needs to be challenged.

It cemented my views and I will continue to act in a way that does not cause, or appear to cause, any threat to other members of the community

I learnt a huge amount about the BE LADs initiative and will certainly try to follow all the suggestions to make women and girls feel safe.

Clear simple advice for me that can help men to make women feel more comfortable. This is what I can then pass onto and share with men who are my colleagues and friends.

More conscious of concerns lone females may have in certain situations. To adjust actions accordingly I will make some changes to my behaviour when I am out alone and have already passed on this on advice given to others.

Poppy kindly agreed for her final module to be recorded, so this is now available on our CityNet



We are working with BeLads to see how we can further embed approach with our partners / community, Poppy Murray has presented to our CoL Crime Prevention Association and we are exploring future options

Active Bystander



100% stated they would recommend this module to others

Why did you sign up

8% PDR requirement

Interested in what it would entail.

To improve my confidence in intervening

As a new supervisor I thought it would be useful

Always keen to understand how we can better challenging and dealing with issues.

I wanted to know more about challenging inappropriate behaviour or stepping in at right times.

Enhance my understanding.

Because I wanted to learn the best way to be an active bystander in and outside of work

The course offered subject was different to any other training i have attended

Was intrigued by the topic

What did you learn?

The effectiveness of learning to deal with matters directly and in a timely way

How important it is for early intervention on potentially inappropriate behaviour/comments

Will try to "call in" people who I think are being inappropriate, rather than "call out"

As a supervisor for Police staff in a predominantly police environment, there are options to resolving challenges

that don't need to resort immediately to PSD referral. It was refreshing to know that supervisors (and staff alike) can use common sense to address behaviours in the work place

Its an important filter to make consideration of during decision making,

Be more aware of everyone around when behaviour crosses the mark and step up to challenge

I learnt how I can intervene when colleagues or general people act or say inappropriate things

Different approaches to dealing with different situations/people.

To actively challenge and try to solve issues at low level

A lot was learned such as what to do and would implement this on day to day

Responsibilities as a supervisor



We have planned 12 more open sessions booked for 2024, which is 2 a month. We will continue to deliver it as part of the Student Officer programme.

Ethical Dilemmas



The plan regarding further roll out is:

We are running 10 more sessions for Supervisors over the next six months.

We are delivering bespoke sessions to all Senior Leadership Teams over the next few months. (we delivered a session to the Senior Leadership Forum which received positive feedback)

We are delivering a module as part of the Chief Inspector Modular programme

It will be incorporated into our future Police Leadership Programme 2024/25

We will be running Ethical Dilemma Challenge Panels in the Autumn

The updated Code of Ethics has been incorporated into all programmes



Future sessions as outlined are arranged for 2024/25

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.

100% stated they would recommend this to others

Why did you sign up?

3% PDR requirement

I was interested in learning more about current issues effecting the Jewish Community

To get a better understanding of the UK Jewish community and their challenges, especially antisemitism.

It was of interest to me with regards to my work in custody.

To get a better insight into the Jewish community, the threat to them and their perspective

To gain further understanding of the challenges faced by the Jewish community and how it relates to policing

I have lots of Jewish friends, I live 200m away from a synagogue in Woodford Green and I like to hear how the Jewish community are interacting with the police to protect themselves.

I don't really know a lot about the Jewish community so I wanted to increase my knowledge.

Under Inclusivity but also have a personal interest as a close friend was in Sderot at the time of the attacks in Israel.

My great grandparents were Jewish, I have a strong affiliation and interest.

What did you learn?

I learnt an incredible amount which I was not aware of especially the life of ultra orthodox communities and also

the commitments of CST to look after their communities and engage with the Police

The way I would treat a person of the Jewish Faith whilst in custody.

I have already referred the CST to a member of the Jewish community who has significant concerns about the rising crime and requires support

I am so impressed that CST has a national control room.

I learnt about the Jewish faith, the threats whilst going about daily life and about what is in place to support the community

I have already advised my friend of your organisation, how to distinguish between anti-Semitic behaviour.

I learnt about the Jewish community, their traditions and the religion and also about the existence of the CST and their role within the community and alongside the police



We have already worked with CST as a Force and it is around showing a balanced approach and including 'tell mama' in future for anti-muslim hate awareness (albeit not a political thing when planned, just circumstances now).

100% stated they would recommend this module to others

Why did you sign up

2% PDR requirement

To enhance my understanding of issues surrounding the police's relationship with ethnic minorities.

People who attended previously said it was good

I was interested in the topic from a different perspective

I was interested in the speakers experiences with the police.

From the list of "our people" training/events I chose the two that I thought would be most interesting/helpful.

To learn more about Stop & Search and how it impacts the community

Interested in the black experience with the police

What did you learn

This enhanced my learning around unconscious bias, conscious bias and racism in the public realm. I would seek to utilise this more in my role as a constable on the frontline.

I learned that I can challenge.

To be mindful that previous interactions with the police may not have been positive, but my actions can change the viewpoint

I think I will take the trainers experiences and weigh them up with my own going forward.

I learnt how the police impact on the black community and how I can adapt my approach going forward

I am honestly still thinking about the whole presentation 5 days afterwards, and seeing things a lot differently!

The impact of conscious and un-conscious bias, being mindful of how you treat others

I am black and i understand what it means to be judged even before you speak. basically don't judge

I already knew of how the police can be perceived however the world we live in still needs to change on both fronts, there needs to be joint working to make a difference. Not everyone is fortunate and remember this in my day-to-day role. Have empathy and compassion where needed but also ensuring I do the role professionally.

To the police, it is our job, but the impact on people's lives is significant. Communication is key.

Makes me more confident recognising microaggressions



Future sessions arranged for 2024 focussing on Local Policing in the first instance.

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

International Women's Day – 8th March

This event was organised by the CoLP Women's Network.

The event was opened by T/Commissioner Pete O'Doherty

Speakers included:

Alderman Professor Emma Edham – Deputy Head of International Law

L/Cpl Natasha Day MBE, Royal Army Medical Corps

44 attendees (50 places)

15 officers, 29 staff

10 male, 34 female

Feedback

There was very positive feedback regarding the speakers (the topics covered and variety of experience), people also enjoyed that the Women's Network were hosting an event at City of London Police, and they enjoyed the networking. As a result of the event, 4 people asked to join the network

This event was included as a module within the Inclusivity Programme



The Women's Network publicise a range of external talks on their Teams Channel. They have an active Executive Committee. Membership is 110.

Team Day



Members of Professionalism and Trust attended The Imperial War Museum

22 attendees

The team organised a team day out as one of their Equality and Inclusion models.

They visited the Holocaust Galleries at the Imperial War museum which told the history through photos, books, artworks, letters and personal objects of those that suffered and were murdered during the Holocaust.

It was great that the flexibility of the Inclusivity Programme enabled this to take place.



As part of the 2024/25 Inclusivity Programme, we want to highlight the different ways people can further their understanding of equity, diversity and inclusion

Committee: Resources, Risk and Estates Committee Finance Committee Police Authority Board	Dated: 20 th May 2024 4 th June 2024 5 th June 2024
Subject: Business Rate Premium	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	All
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Chief Financial Officer and Chamberlain Commissioner, City of London Police	For Information
Report author: Daniel Peattie, Assistant Director, Strategic Finance	

Summary

This report sets out the current year medium term forecast of Business Rates Premium income (based on current rates) and how this is allocated between the City of London Police and the City of London Corporation. It aims to provide transparency on the allocation of BRP with proposed future arrangements.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. The Local Government Finance Act 1988 replaced the Locally Determined Non Domestic Rate with a National Non-Domestic Rate (NNDR) set by the Government. In addition to the NNDR, there is a discounted rate for small businesses known as the Small Business Non-Domestic Rate (SBNDR). Because of its special circumstances, notably its very small resident population and high daytime population, the Common Council of the City of London is allowed uniquely to set its own rate, or multiplier via the business rates premium, and retain part of the proceeds to help pay for the services it provides. It may set this rate, subject to certain constraints, at a higher or lower level than the rate which applies outside the City of London. The City

sets the multipliers for each financial year according to formulae set by legislation.

Current Position

2. In 2023/24 the City of London set a non-domestic rating multiplier of 0.526 (52.4p in the £) and a small business non-domestic rating multiplier of 0.513 (51.3p in the £). This comprises the NNDR and SBNDR multipliers of 0.512 and 0.499 respectively, plus a premium of 1.4p in the £ to provide additional funding to enable the City Corporation to continue to support Police, security, resilience and contingency planning at an enhanced level.
3. The Annual Business Rate Payers consultation took place on 30th January 2024, where the Chairman of Policy and Chairman of Finance, alongside the Commissioner presented a compelling narrative to ratepayers and residents in support of an increase in Business Rate Premium. The responses from those that attended did not push back on the proposals. The Court of Common Council met on 7th March and approved the increase in 2024/25 of £0.04p in the £ raising up to c£8.1m pa in BRP.
4. The City Corporation currently restricts the use of BRP proceeds to fund security activity within the City, which means around 90% of these funds are directed toward the City of London Police (CoLP), with the remaining amount funding security spend within the local authority remit including cost of security officers, security system, CCTV and mobile patrols.
5. The table below sets out the estimated BRP and shows how this is allocated across all areas. It should be noted that these figures include the following assumptions:
 - The future intake assumes 15% relief allowance for non-collection of income which is based on average collection rates. The rate can range between 6% and 26%.
 - No further increase to the BRP has been factored in after 2024/25 therefore rate stays fixed at 1.8p in the £

	CoLP	Secure	Contact	CoLP	Total	PAB	CoLC	New St	Loan	Total	p in £	Intake	Variance
	Baseline	City	Centre	Increase	CoLP	2022			Repayment				
	Note I	Note II	Note III	Note IV		Note V	Note VI	Note VII	Note VIII				
	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m		£m	
22/23	20.9		0.7		21.6	1	1.6	-		24.2	1.2	28.10	3.90
23/24	27.5		0.7		28.2	1	2.7	-		31.9	1.4	30.70	1.16
24/25	25.3	1	0.7	2.6	29.6	1	2.7	2.1	0.5	35.9	1.8	38.90	3.03
25/26	27.3	1	0.7	2.2	31.2	1	2.7	2.2	0.5	37.7	1.8	38.90	1.22
26/27	27.3	1	0.7	4.3	33.3	1	2.8	2.3	1	40.4	1.8	38.90	1.48
27/28	27.3	1	0.7	6.6	35.6	1	2.8	2.3	1	42.7	1.8	38.90	3.84
Total							15.32	8.92	3.00				1.66

Notes

- I. CoLP Baseline – baseline created from the 0.4p increase in BRP in April 2022 as it was allocated to balance the Police MTFP at that point.
- II. Secure City: - from 24/25 the CoLP will take ownership of the Secure City Programme and £1m per annum has been provided towards increased run costs.
- III. Contact Centre: - £0.7m per annum funding was transferred from Corporation to CoLP in 2019 to take over the operation of this service from CoLC.
- IV. CoLP Increase: - This is the annual gap each year after taking account of all pressures and mitigations currently identified, which is funded via increase in BRP allocation to the Police. The requirement for such levels of BRP has been supported by analyses of local police funding %s compared to other (particularly South East) forces – after adjusting for the benefit to CoLP of rent-free accommodation and the Precept Grant received from Home Office in lieu of CoLP's inability to Precept.
- V. £1m per annum allocated to Police Authority Board
- VI. CoLC: - Costs incurred by the City of London including security officers, CCTV, security systems and mobile patrols. This will be monitored annually to ensure increased costs are being picked up. The current figures are based on the 22/23 actual which have been inflated year on year.
- VII. New Street: - Rent of New Street occupied by the City of London Police to be funded from BRP, approved by Court of Common Council on 7th March 2024 under City Fund 2024/25 budget and MTFP report.
- VIII. Loan repayment: - This is to assist with faster repayment of internal (City Fund) loans to CoLP since 2020 for capital financing priorities.

During 2023/24 the CoLP cleared the remaining balance on the Action Fraud Loan (£2m) and ULEZ vehicle replacement (£532k) by using reserves. The decision to accelerate the repayment of these loans was documented within the CoLP's 24/25 Revenue and Capital Budget report.

6. BRP for 2023/24 is estimated to be £30.7m of which £28.2m has been allocated to the CoLP and £2.7m has been retained by the City of London for security purposes (with the difference balanced through reserves). The BRP for 2024/25, current rate of 1.8p in the £ fully balances the Police Medium term financial plan as it stands and also allows for a small amount of fast tracking of loan repayments as well as providing for New Street and increase in security costs within the City of London.
7. Based on the assumptions above, there will be a surplus of £1.66m over the period which will be transferred into reserves with surpluses / deficits smoothed out over time.

Implications

8. Financial implications – based on the assumptions above, the 1.8p in the £ fully balances the police MTFP and the City's security costs however this will need to be monitored to ensure we are picking up the latest costs. Key risks include unfunded

increases in officer and staff salaries -particularly as a result of continuing Met increases in London Weighting for Officers and Ambition 25 for staff and adverse outcomes from Spending Review 2025 for CoLP's local and / or national roles. Key opportunities include increased core funding as part of the 2025 Spending Review (not currently assumed in the MTFP), increased national funding and smaller and regular increases in BRP as well as a continuing to drive out savings / mitigation opportunities.

Conclusion

9. The Police MTFP as it stands, and the City of London's security costs are fully balanced by the current BRP however this will be monitored as identified in the paragraph above.

Appendices

None

Daniel Peattie

Assistant Director, Strategic Finance

E: Daniel.Peattie@cityoflondon.gov.uk

Committee(s): Finance Committee Police Authority Board Policy & Resources Committee EDI Sub Committee	Dated: 4 June 2023 5 June 2023 6 June 2023 10 June 2023 26 June 2023
Subject: Responsible Procurement Impact Report FY23-24	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	All six outcomes
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£0
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Caroline Al-Beyerty, Chamberlain	For Information
Report author: Lisa Moore, Responsible Procurement Manager	

Summary

As the governing body of the square mile, the City Corporation, has responsibilities to residents, workers, businesses, visitors and many more. Our operations are one way that we can impact the lives of those who work, live, or visit our spaces, but to be world-class and achieve our ambitions we need to work collaboratively. This report captures some of the impact that our supply chain partners have had on the diverse communities we serve, on the City as a vibrant thriving destination and leading on a sustainable environment.

This report holds us and our supply chain partners accountable, measuring our success against targets that will evolve to reflect new challenges. It also publicly recognises suppliers who have fulfilled their commitments and showcase ‘what good looks like’ to the City Corporation. We’re proud to share 39 impact statistics and 13 supplier spotlights in this report.

We consulted with the six procurement category boards and had approval from the Town Clerk’s Senior Leadership Team to publish this report externally.

Recommendation(s)

Members are asked to note the impact report prior to external publication on the Responsible Procurement Policy page at the end of June 2024.

Main Report

Background

1. In July 2022, Policy & Resources Committee approved an updated Responsible Procurement Policy which outlines the importance of responsible procurement as part of the overall value delivered through procurement; the responsibilities of buying officers at each stage of the commercial life cycle and the six responsible procurement commitments the City Corporation actively work on with its supply chain.
2. The six responsible procurement commitments are: taking climate action; promoting supplier diversity (diverse owned enterprises and SMEs); embedding equity, diversity and inclusion; guarding against modern slavery; facilitating work-related opportunities and delivering meaningful social value outcomes. Appendix one for full wording.
3. This policy also introduced a mandatory 15% responsible procurement weighting for all strategic procurement tenders.
4. The Commercial Service committed to compiling an annual impact report from FY23-24 to be published in Q1 of the following financial year.
5. In October 2023, the Commercial Service underwent an audit under the ISO 20400 standard on Sustainable Procurement. The City Corporation scored 2.73 out of 5 as part of this process which is a better than average first-time score. The overall findings of the report scored the City Corporation highly for written policy and guidance but found that the further from the central responsible procurement team the less likely officers understood their responsibilities in delivering against the Responsible Procurement Policy. Appendix 2 has more information.

Current Position

6. The annual impact report (PDF in appendix four) showcases the best added value delivered by and with our supply chain partners; gives praise to suppliers who have fulfilled their commitments and displays what good looks like to the City Corporation.
7. With this report we can show City Corporation officers and Members the impact their work is having on our communities and beyond. Our residents can see that the City Corporation leverages supply chain spend for their benefit. Our stakeholders will know we are a responsible business. (e.g. Charities Commission, potential applicants, investors, etc).
8. We've committed to publishing an annual report, but to keep momentum we will be producing a mid-year update and other content to be shared throughout the year e.g. case studies and social media posts.
9. We have begun work with the Corporate Strategy Team to align our reporting with the requirements of the new Corporate Plan 2024 – 2029. Appendix three outlines how the current responsible procurement commitments can be a vehicle for the six outcomes in the Corporate Plan.
10. This report also recognises our journey to be leaders in responsible procurement using our influence and leverage to shape how the public sector addresses the topic. This is especially true for the commitments on climate action and supplier

diversity which is reflected in the report; implementation of a carbon emissions reporting system and other London boroughs joining MSDUK.

11. We will feed into the procurement governance review to evaluate how we reach more stakeholders in the business and gather more information on the impact of the Responsible Procurement Policy commitments.

Key Data

12. The City Corporation spends roughly £400m each year on goods, services and works through third party spend. In FY 23/24, 116 contracts totalling £370.5m were entered into for contracts £100,000 and above.
13. The data provided in the impact report is a mixture of quantitative and qualitative data. It contains 39 impact statistics, 13 supplier spotlights (short case studies), and information from 30 different suppliers. Such as:
 - 92 young people supported through a digital skill-boosting programme from PwC and Palantir, encouraging social mobility and entry into the technology sector
 - 24 outreach events attended to meet and engage with diverse-owned enterprises or SMEs
 - Supplier Spotlight showcasing the work five suppliers in the built environment taking proactive steps to support under-represented groups in their industry
14. The report recognises that City Corporation is also on a journey, so it includes positive steps that the City Corporation has taken such as implementing a new carbon reporting system and better supplier diversity reporting data. The report acts as our benchmark includes information on what's next so we can hold ourselves to account next year.
15. We consulted with the six procurement category boards and had approval from the Town Clerk's Senior Leadership Team to publish this report externally. We wanted to provide Members the opportunity to see the report before it goes live to the public. We have selected a few committees for this paper based on previous interest in the Responsible Procurement Policy. We will review other committees for future reporting. This report will be included in the City Bridge Foundation's Director's Report.
16. The information included in the impact report was selected to show impact against the six commitments on our contracts. We know more is being done as we received information up until the impact report was finalised. We hope publishing the impact report will influence more officers and suppliers to share information with the central responsible procurement team in future.

Corporate & Strategic Implications

17. Strategic implications – The six responsible procurement commitments have a strong alignment to the priorities set out in our new Corporate Plan. Appendix three has more information. Additionally, the central government's National Procurement Policy Statement includes a responsibility to deliver added value for the tax payer. Lastly, the City Corporation is a signatory of the UN Global Compact and other

bodies like the Social Mobility Foundation, memberships which include requirements to report on impact.

18. Financial implications – None
19. Resource implications – Compiling this report is resource intensive as it is mostly manual data collection.
20. Legal implications – The suppliers mentioned in the report have all confirmed their willingness to be part of this public report.
21. Risk implications – None
22. Equalities implications – The commitments in the Responsible Procurement Policy should positively impact or seek to reduce negative impacts on people with protected characteristics.
23. Climate implications - The commitments in the Responsible Procurement Policy should positively impact or seek to reduce negative impacts on climate and other aspects of environmental sustainability. Climate action is our number one responsible procurement commitment. Four of the thirteen supplier spotlights have a climate action focus.
24. Security implications - None

Conclusion

25. The Corporate Plan states that the City Corporation should be values-driven in our interactions, promoting equity, diversity and inclusion, and supporting sustainability (economic, social, and environmental).
26. This report will promote the City Corporation as a leader in responsible procurement and engage with suppliers who want to work with us. This is not a static process. We will be working closely with contract managers and suppliers across the business to produce reports in future.

Appendices

- Appendix 1 - City Corporation Responsible Procurement Commitments in full
- Appendix 2 - City Corporation ISO 20400 Sustainable Procurement overall score
- Appendix 3 - Corporate Plan Objectives mapped against relevant responsible procurement commitments
- Appendix 4 – Responsible Procurement Impact Report (separate PDF)

Background Papers

- None

Lisa Moore

Responsible Procurement Manager, Commercial Services, Chamberlain's

T: 020 7332 3273

E: lisa.moore@cityoflondon.gov.uk

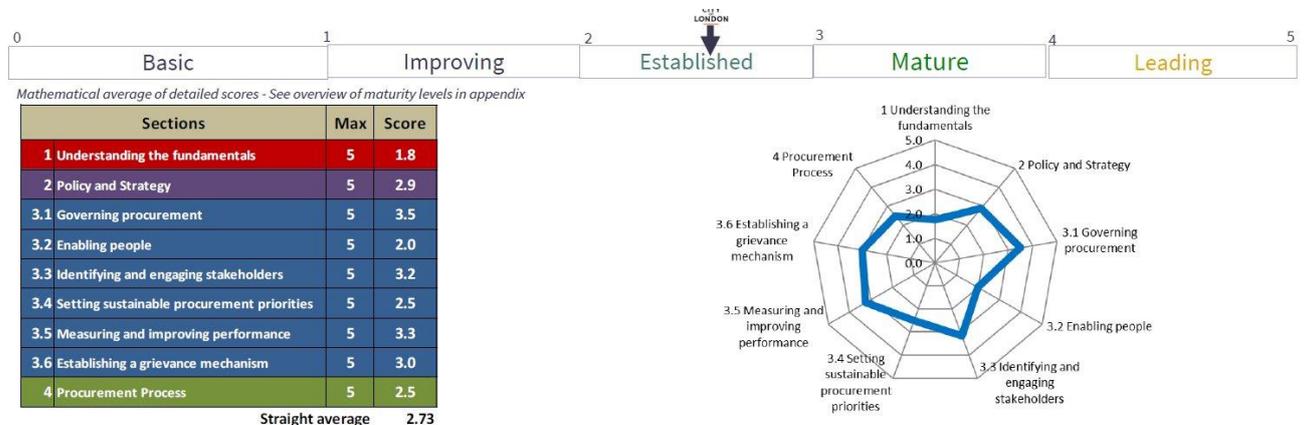
Appendix 1: Responsible Procurement Commitments

Each commitment is a strategic theme based on related policy outcomes that reflect the City Corporations priorities. The City Corporation commits to working with its supply chain to:

1. Take climate action and minimise environmental impacts of procurement on our operations and throughout our supply chain.
2. Encourage and facilitate supplier diversity (Diverse Owned Enterprises and SMEs) through direct contracts, partnerships and active monitoring.
3. Embed equity, diversity and inclusion throughout the contract process and work with suppliers who have proven to take active steps within their own organisations, supply chain and industry.
4. Protect human rights in our supply chain by working with suppliers who undertake due diligence to guard against modern slavery and other human rights abuses.
5. Facilitate meaningful work-related opportunities, which are actively targeted to enable social mobility and inclusion.
6. Achieve meaningful social value outcomes according to organisational and stakeholder priorities through internal collaboration, community input and supplier engagement.

Appendix 2: ISO 20400 Sustainable Procurement overall score

With an overall score of 2.73, the City Corporation is an 'established' organisation in the field of sustainable procurement.



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Appendix 3: Corporate Plan Objectives mapped against relevant responsible procurement commitments as a vehicle for delivering the desired corporate plan outcomes.

Corporate Plan Outcome: Diverse Engaged Communities

- Supplier Diversity - supporting the upcoming SME Strategy.
- Equity Diversity & Inclusion - suppliers contributing and sharing information for the City Belonging Project.

Corporate Plan Outcome: Leading Sustainable Environment

- Climate Action - Working in partnership with our supply chain to take climate action on our contracts; promoting more accurate carbon emissions data; seeking to reduce emissions on our sites; and supporting the circular economy and just transition.

Corporate Plan Outcome: Dynamic Economic Growth

- Supplier diversity supporting SMEs and diverse owned enterprises boosting economic growth.

Corporate Plan Outcome: Providing Excellent Services

- Work Related Opportunities, Social Value - support for education, learning and skills, carers strategy and providing support for young people and schools
- EDI - focus on equality, diversity and inclusion to improve social mobility and reduce inequalities through employment, skills and other support.
- Climate Action - improve air quality in Square Mile
- Social Value - use libraries and community spaces to support learning, tackle social isolation, and build resilience.

Corporate Plan Outcome: Vibrant Thriving Destination

- Social Value delivered by supply chain partners to strengthen offering of the Business Improvement Districts, City businesses and charities.
- Climate Action/ Work Related Opportunities – promoting training and skills for a sustainable built environment (Skills for a sustainable skyline)
- Supplier Diversity - supplier readiness and engagement with SMEs

Corporate Plan Outcome: Flourishing Public Spaces

Climate Action, Supplier Diversity EDI, Modern Slavery, Work Related Opportunities, Social Value on Salisbury Square and Barbican Renewal

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Responsible procurement

Impact report 2023 - 2024



Partnering for a better future



“We are committed to preserving the natural environment and using the power of our diverse supply chain to reduce carbon, waste, air pollutants and biodiversity loss; supporting our **Climate Action Strategy** is the top priority for suppliers.”

Alderman Alison Gowman
Policy Lead for Sustainability



“Providing excellent services is an outcome in our Corporate Plan 2024 - 2029, and a focus on **equity, equality, diversity and inclusion** to improve social mobility and reduce inequalities is also a priority in our Equality Objectives 2024 - 2029. We can’t overlook the impact that our supply chain can have on addressing representation and inclusion. We’re delighted to feature some amazing progress by our built environment suppliers in this report.”

Dionne Corradine
Chief Strategy Officer



“The City of London Police is a proactive force guarding against **modern slavery**. It is essential that we work with suppliers who are aware of the risks and take active steps to ensure human rights are upheld here in the UK and abroad.”

Peter O’Doherty
Temporary Commissioner, City of London Police



“We want **supply chains as diverse as London** helping us innovate and create value for our communities. We’re incredibly proud of the support and engagement we’ve accomplished for SMEs and diverse owned enterprises this year. We are breaking down barriers to our procurement team and making lasting relationships with new suppliers.”

Councillor Paul Singh
Policy Lead for SMEs



“We’re proud to be working with supply chain partners that engage our communities and provide opportunities for growth in skills which are essential for the future. We celebrate every apprentice, graduate, intern, or other **work-related opportunity** provided on our sites through these contractors.”

Alison Littlewood
Chief People Officer



“**Social value** is critical in providing excellent services to our communities for the things they need. It is important that our suppliers share our values and demonstrate the impact they have on our communities through creating jobs, volunteering, providing employment support and more.”

Judith Finlay
Executive Director of Community & Children’s Services

“What does good look like to us?”

It's a question we ask ourselves often here at the City of London Corporation. Last year, Responsible Procurement set out on a quest for answers. The result: our first-ever impact report.

Page 151

Responsible procurement — or in other words, **sourcing products and services ethically, sustainably, and from organisations that share our values** — is integral to the broader Corporate Plan at the City Corporation. We buy everything from the bathroom hand wash and breakroom tea to equipment recycling and building security. Each and every touchpoint like these, no matter how seemingly small, represents an opportunity for **exponential positive impact** across our supply chain.

From **April 2023 to March 2024**, we got to know our suppliers over the course of **dedicated meetings**. As it turns out, they are up to some serious good that we couldn't be prouder to share. Across the next several pages of this inaugural impact report, you'll find our **six supply chain commitments, impact statistics, supplier spotlights**, and **what's in store for the future**.

For this first year, we embraced an approach of **shared curiosity**. We had meaningful conversations and learned together. We encouraged suppliers to reflect on what they are able to do. And we explored opportunities, **building a solid foundation for years to come**.

As we're at the beginning of our reporting journey, our data collection efforts are a work in progress. Rather than being all-inclusive, this report scratches the surface — and that's a very good thing. We hope our findings will inspire officers to contact their own suppliers and **discover the possibilities that await**.

Our six supply chain commitments

Originating out of a desire to do business responsibly, the City Corporation Responsible Procurement commits to:

1. Take **climate action** and minimise environmental impacts of procurement on our operations and throughout our supply chain
2. Encourage and facilitate **supplier diversity** (Diverse-Owned Enterprises and SMEs) through direct contracts, partnerships, and active monitoring
3. Embed **equity, diversity, and inclusion** throughout the contract process and work with suppliers who have proven to take active steps within their own organisations, supply chain, and industry
4. Protect human rights in our supply chain by working with suppliers who undertake due diligence to guard against **modern slavery** and other human rights abuses
5. Facilitate **meaningful work-related opportunities**, which are actively targeted to enable social mobility and inclusion
6. Achieve **meaningful social value outcomes** according to organisational and stakeholder priorities through internal collaboration, community input, and supplier engagement

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Supply chain commitments key:



Climate action



Modern slavery



Supplier diversity



Meaningful work-related opportunities



Equity, diversity and inclusion



Meaningful social value outcomes

In line with the **UN Sustainable Development Goals (SDGs)**, which recognise that true sustainability requires a multi-layered approach, our six supply chain commitments hold our department accountable to the environment, people near and far, and the betterment of our society through the engagement of our partners.





Supplier spotlight

As part of our climate action strategy, the City Corporation has invested funds to support **Heart of The City** (HOTC) in delivering the 'Climate 4 SMEs: 4 Steps to Action programme'. This initiative ensures that no SME is left behind in the journey towards climate action, helping SMEs measure their carbon footprints and create a plan to achieve net-zero emissions. We have actively promoted this programme through our supplier engagements, and as a result, **OCS** and **ISS** have not only engaged with HOTC but have promoted the programme within their supply chains, assisting more SMEs to work towards supporting the UK's net-zero targets.

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The feedback from **Sykes & Sons**, one of our suppliers, highlights the value of HOTC's programme:

- They've transitioned from low awareness to active participation, taking steps towards adopting an action plan driven by their key clients and financial implications
- Their tree planting initiatives have already yielded significant results, with 554 trees planted and 40.26 metric tons of carbon reduction achieved to date (equivalent to driving 99,885 miles)
- Additionally, they have committed to planting 1,000 trees to offset carbon from The City of London School for Girls and Walbrook Wharf works



7%



CO₂e reduction across Purchased Goods and Services (PG&S) compared to 18/19 baseline

17



peer-to-peer supplier diversity and best practice engagements with private and public sector stakeholders

45/45



Neilcott scored full marks on their Considerate Constructors Scheme assessment and was shortlisted for an award on their refurbishment of Tottenham Court Road, which demonstrated carbon reduction, promoted mental health on site, and provided overnight refuge for local rough sleepers



92



young people supported through a digital skill-boosting programme from **PwC and Palantir**, encouraging social mobility and entry into the technology sector

1,875



products purchased via the Crown Commercial Service catalogue on a framework supported by **Electronics Watch**, an organisation that promotes and protects the rights of workers in global supply chains.



Supplier spotlight

The key supplier, **FM Conway**, has a Net Zero Strategy that supports our commitment to climate action and minimising environmental impacts on City Corporation projects. This includes achieving BSI certification to PAS 2080 standard and managing whole-life carbon in infrastructure and the built environment, with a focus on decarbonising projects through:

- Adopting 2 electric cranes, saving 130 tonnes of CO2 emissions.
- Transitioning their Aldershot asphalt plant to mains gas & electric reduces the carbon footprint of asphalt supplied
- Utilising lower carbon cement (CEM II) across operations resulted in roughly 760m3 of concrete being used, with a carbon savings of around 32 tonnes of CO2e
- Implementing one fully electric <1.5-tonne panel van to fulfil contracts

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2.73



out of 5: our first-ever score on ISO 20400 Sustainable Procurement (the average first-time score is 2.15)



November 2023



CBRE delivers an event for clients at Guildhall, fostering discussion around the value of EDI in the workplace

£1,500



charitable donation from **Greenham** to the Lord Mayor's Appeal, which supports the inclusion, mental health, and skills of people living and working in the City of London and neighbouring communities



Supplier spotlight

Sharing our supplier diversity journey & experiences with fellow networks and councils, The London Responsible Procurement Network made supplier diversity the topic for one of three meetings it held last year, starting a Supplier Diversity Working Group. **OT Group**, the winning supplier for our new 'commonly purchased items' catalogue, which could deliver £4m worth of spend, mapped the diversity of their supply chain. We're delighted to host 134 attendees across two meet-the-buyer events from '23 to '24.



Supplier spotlight

The London Careers Festival is a vital platform to connect young individuals from London and around the country with diverse career opportunities across sectors, igniting their passion and nurturing their potential. 30,000 students were supported over the two-week event, with 3 of our supply chain partners participating in this initiative, providing meaningful work-related opportunities:

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- **Phoenix Software** engaged students at the Guildhall by providing hands-on experiences with their HoloLens, inspiring students to explore technology in various industries
- **PwC** 'a Day in the Life of a Consultant' workshop to 20 students offered invaluable insights into technology-focused school-leaver programmes spotlighting unconventional career paths
- With Palantir, PwC's series of 5 social value initiatives focused on social mobility, digital upskilling, and digital inclusion attracted diverse audiences to each event
- **MACE**, a returning presenter at the festival, hosted a workshop at the Guildhall on 'Careers in Construction', showcasing the diverse roles available. Moreover, they hosted students on one of their construction sites, offering a glimpse into the live environment



50%

less energy used by more efficient magnetic door locks supplied by ISS



September 2023

sponsored critical research from **Action Sustainability & Partners** on the ethical purchasing of solar panels. The paper was shortlisted for an EDIE Award in 2024! The paper was downloaded 1,279 times across 10 countries



20

people supported through other work-related opportunities, including internships and as graduates with **ISS, MACE** and **CBRE**



470

female-owned businesses with which the City Corporation has direct spend



61

ethnic minority-owned businesses with which the City Corporation has direct spend





Supplier spotlight

Through our key partnership with **Greenham**, we can reduce single-use plastic and carbon emissions within our supply chain for personal protective equipment (PPE) and cleaning and hygiene products by:

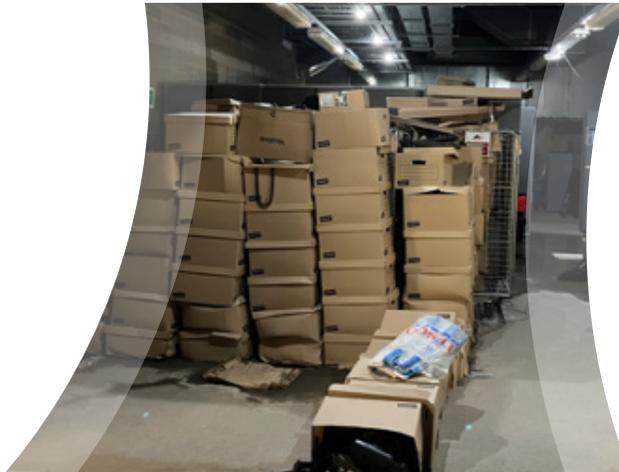
- Choosing more sustainable products that Greenham offers through their Gold, Silver, and Bronze ranking system
- Replacing 750mL ready-to-use spray bottles with 5L concentrates will save 69 KG of single-use plastic per year for every product switched
- Receiving goods in reusable tote boxes via an electric delivery van, removing 40g of plastic wrap per pallet and reducing vehicle emissions
- Switching to a less wasteful type of toilet paper, which has the potential to save 115,790 KG of CO2e per year

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50%

of work carried out by **Bloom**, a procurement solution for professional services, was with SMEs and 25% with VCSEs



2,752

items of retired IT equipment repurposed by DSA Connect for prisoner reskilling initiatives in partnership with **CBRE**



Supplier spotlight

Through supply chain collaborations with **Wates** as a supplier to the City Corporation, Wates has played a pivotal role in fostering an inclusive business environment for diverse suppliers like Masterdec, supporting The City Corporation with its mission to promote economic growth and create positive social change.

- Masterdec, a woman-owned business, has been a key supplier in Wates supply chain installing fire door sets and conducting various fire-stopping actions
- Providing services across key locations like the Guildhall complex, London Metropolitan Archives, City of London Boys School, and Mayors Court
- Masterdec has confidently expanded its service offerings and footprint as a trusted partner to Wates, reflecting the power of collaboration in driving meaningful progress



Supplier spotlight

For many people, a cup of tea is an important part of the day. Now, through our supply chain, each cup we drink or pour helps others:

- Hope and Glory has a strong sustainability ethos, ensuring that the tea plants and the farmers' livelihoods are protected for the future, and is the default tea for catering at the Central Criminal Courts
- NEMI Teas served across The City of London engagements (Christmas luncheon by **Company of Cooks**), and sites such as the Chamberlain's office align with nearly all of our six supply chain commitments. It is an ethnic minority business that employs refugees and is committed to environmental sustainability. In a full circle moment, we are pleased to have introduced the NEMI Teas team to the Small Business Research and Enterprise Centre (SBREC), helping NEMI Teas to use SBREC databases and spaces to grow their business. We are grateful to our suppliers, **Company of Cooks** and **Thomas Franks**, for serving NEMI Teas. Every cuppa counts!

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69%



percentage of **APS**, our print supplier, onward supply chain spend spent with SMEs



5



student doctors hosted by **Kennedy Occupational Health Ltd** to provide exposure to occupational health as a profession



16



SME suppliers funded by the City Corporation to participate in the Climate for SMEs: 4 Steps To Action course from **Heart of the City**



2.23



tonnes of retired office equipment rehomed with schools and social enterprises by Crown Workspace in partnership with **CBRE**

10



suppliers received modern slavery and supply chain due diligence training from **Motorola Solutions UK** in acknowledgement of Anti-Slavery Day in October

2,634



small and micro businesses with which the City Corporation has direct spend

2,806



electronic devices evaluated by **Phoenix Software** in our first IT carbon report

17



People supported by Hays Specialist Recruitment on employability skills through our Connecting Communities team.



Supplier spotlight

Recognising the importance of supporting underrepresented groups, our supply chain has helped us implement an inclusive workplace within our operations. This collaborative effort is evident in the construction and facilities management sectors, with suppliers taking proactive steps to unlock opportunities for marginalised groups, particularly women in the built environment.

- **ISS** engineer working on a contract for the City Corporation was nominated for the prestigious 'Women in STEM' Award at the ISS internal awards, recognising talented individuals irrespective of gender
- **WATES** participated in a 'Meet the Professional' session at City of London Academy Highgate Hill for International Women's Day, inspiring the next generation of female professionals
- **CBRE** contributed to driving positive change within the facilities management industry, a traditionally male dominated field, by welcoming a woman to the engineering team assigned to City Corporation contracts.
- **OCS** delivered a learn-to-earn program at Mulberry School for Girls in Tower Hamlets, teaching financial literacy and career exploration skills to over 200 students
- **MACE** organised a week-long work experience on our Salisbury Square project called 'Constructing Your Success' for young girls in sixth form, and the initiative supported 17 participants. One of the students who took part landed a MACE apprenticeship, starting on the Salisbury Square project this year. It showcases the impact of such initiatives in cultivating future talent

January 2024



first Senior Lead appointed to be a strategic corporate lead for modern slavery





Supplier spotlight

With funding support from the City Corporation, **Action Sustainability & Partners** has spearheaded efforts to combat modern slavery in solar panel supply chains. Their published procurement guide, 'Addressing Modern Slavery in Solar PV Supply Chains,' provides invaluable insights into industry risks, impacts and actionable steps for procurement due diligence.

"People often ask me how to ensure solar panels for large-scale projects are free of forced labour. Until Action Sustainability's new guidance, there wasn't a comprehensive set of recommendations for procurement specialists. This guidance encourages stakeholders to eliminate forced labour from solar supply chains. These tools will significantly increase transparency in the sector."



August 2023



published our first Low-Carbon Procurement Guidance for colleagues and suppliers

£500



charitable donation from **FM Conway** to City Harvest, which works with food banks, soup kitchens, community centres, and refugees across London



£820k

amount **Neilcott** spent with SMEs on Tottenham Court Road refurbishment project

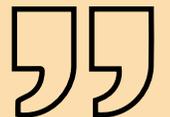


7

apprentices supported with working toward qualifications, including engineering and business administration through our contracts with **ISS, OCS, PwC, and MACE**

"It's been such a good experience working alongside both our experienced PwC and CoLP teams on this implementation. It's great that someone of my age is getting the experience of programme managing a programme of this size. I really see the impact that our work is going to have on NFIB and I want to make sure I use this experience and continue to work in Policing as my career progresses."

Harry Burnell
Higher Apprentice at PwC



180,000



paper tickets removed annually as **SABA** enables all 6 car parks across the City Corporation to go ticketless as of April 2023



Supplier spotlight

The City Corporation understands the importance of embedding equity, diversity, and inclusion (EDI) principles throughout its operations and supply chain. **ISS** has fulfilled this commitment through Project SEARCH, a program providing supported internship opportunities for young people with learning disabilities and those on the autistic spectrum. This program has helped The City Corporation to facilitate meaningful work-related opportunities that promote social mobility and inclusion in our operations. Notable achievements include:

- Two interns, supported by ISS, have completed valuable job rotations at locations across The City
- Interns have contributed positively to security and front-of-house roles at sites such as the Barbican/Guildhall School of Music & Drama (GSMD) and Mansion House
- ISS are planning to continue this partnership in the new year with another placement beginning in September 2024

24



outreach events attended to meet and engage with diverse-owned enterprises

333



views of our Data to Decarbonisation webinar co-hosted by **Avarni**

9



contracts with contractual targets for supplier diversity



1



T Level Construction placement through **MACE** on the Salisbury Square collaboration with City of Westminster College

29,845



sheets: the equivalent amount of A4 paper removed from our PCN traffic enforcement supply chain annually thanks to initiatives led by **Marston Holdings**

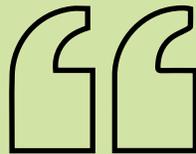




Supplier spotlight

Utilising the innovative capabilities of **Avarni**, a carbon accounting software start-up, the City Corporation embarked on a transformative journey to reduce emissions throughout its supply chain in 2023. Collaborating with 23 key emitting suppliers, data was gathered to create a tailored supplier factor, leveraging DEFRA emissions factors on spending to drive impactful change. The results speak volumes about the effectiveness of this initiative, as evidenced by some of the suppliers of the City Corporation:

- **Preventx**, an SME, achieved an impressive 98% reduction in emissions
- **Thames Reach**, a charity organisation, successfully completed their first carbon footprint and reduced emissions by 50%
- **Banner**, a large corporate entity, realised a commendable 36% decrease in emissions
- **FM Conway**, a major player in infrastructure, demonstrated a noteworthy 22% reduction in emissions



“As a technology partner, **Avarni** is proud to support these initiatives with our decarbonization solutions. Our approach facilitates sustainable procurement practices and enables suppliers to make meaningful strides towards achieving net zero.”

David Tan
Head of customer success, Avarni



360

meals purchased through a local catering supplier by **SocietyLinks**



Supplier spotlight

Through their active involvement at The City of London Freeman’s School, our catering partner, **Thomas Franks**, has been instrumental to the success of our climate action and social value commitments. Their critical work at this site includes:

- Establishing a pupil-run committee with the goals of engaging sustainability issues, tracking and reducing the school’s carbon footprint through their partnership with Planet Mark, switching to reusable plates and utensils
- Partnering with key suppliers located within five miles of the site, allowing for frequent deliveries; this, in turn, increases freshness, reduces spoilage, and maintains menu flexibility
- Producing multiple podcasts for students, parents, and staff around themes of healthy and sustainable eating
- Recycling cooking oil for use as biofuel



Supplier spotlight

The City Corporation recognises that partnering with SMEs and diverse suppliers is vital to supporting conditions for growth through championing diversity in our supply chains. Since joining **MSDUK** in 2020, we have shown consistent progress through our active participation and engagement, with benchmarking exercises capturing our year-on-year improvement.

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- 2020 ► 36% 'Evolving'
- 2021 ► 39% 'Evolving'
- 2022 ► 59% 'Progressive'

- In '23, our efforts to collect more data and the inclusion of contractual obligations for suppliers are two reasons we moved from 'Evolving' to 'Progressive'
- We are making changes to the data we collect at the time of tender and contract award, enabling us to provide better statistics as soon as '25



57%

of PG&S supply chain spend with suppliers that have Science Based Targets initiative (SBTi) or equivalent targets



353

hours of environmental and sustainability training for operative and managerial staff across **ISS** and **OCS** contracts



500

kilograms of waste timber from Guildhall upcycled into wheelchair-accessible planters and a community stage (and much more) by **The Woodshop Of Recycled Delights CIC**



4,574

suppliers mapped by **DataGardener** (a B Corp Certified and an MSDUK ethnic minority business) to report on diverse-owned enterprises in the supply chain



What's next: roadmap

While we are immensely proud of the impact captured in our first impact report and of the actions of our suppliers and partners that made it possible, this is only the start. Moving forward in line with the City Corporation Corporate Plan 2024-2029, Responsible Procurement is committed to cultivating:

Better Data



- Building on the data collection foundations we laid in 2023-2024, leveraging insights to drive impactful decisions
- Involving more contract managers and suppliers in reporting on their impact to deepen their understanding
- Using data to inform our buying processes and guide conversations that support community impact

Better Involvement



- Working more closely with our contract managers to ensure that Responsible Procurement continues to extend its impact beyond our central team
- Providing training and resources to support contract managers in fulfilling commitments
- Strengthening contract managers confidence in their ability to make a positive impact on the community they serve

Better Connection



- Deepening our connections with residents, communities and businesses through the City Corporation's SEND Employment Forum
- Engaging more SMEs and diverse suppliers for climate action support and supply chain access
- Connecting our suppliers with charities and partners for greater community impact

Lisa Moore

Responsible Procurement Manager

City of London Corporation

lisa.moore@cityoflondon.gov.uk

cityoflondon.gov.uk

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Committee(s): Professional Standards and Integrity Committee Police Authority Board	Dated: 4 June 2024 5 June 2024
Subject: City of London Independent Custody Visiting Scheme	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	Diverse engaged communities; vibrant thriving destination
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: The Town Clerk & the Commissioner of the City of London Police	For Information
Report author: / Rachael Waldron, Police Authority Compliance Lead, Town Clerk’s Helen Isaac, Superintendent Criminal Justice Services / Sanjay Andersen, T/Chief Superintendent Professionalism & Trust	

Summary

This report provides an overview of the City of London Independent Custody Visitor Scheme and the current position with regard to membership and recruitment processes. The ICV Scheme has seen volunteers fall from seven to four and is in the process of recruiting, with the ambition to increase this by eight new volunteers. The Police Authority Team and the City Police have developed and agreed a process to improve the effectiveness and efficiency of the on-boarding and ongoing maintenance of the ICV Scheme volunteers, providing clarity on roles and responsibilities.

The report proposes an annual report to PAB on custody issues and Equality, Diversity and Inclusion (EDI) data to ensure scrutiny of this key area of business. It further proposes that this should be timed to coincide with the annual ICV report to present a full picture of custody issues and performance for scrutiny.

Information on Custody Detention Scrutiny Panels (CDSPs) is also provided, with an update on how the City of London proposes to commence this work using existing scrutiny arrangements. Following an Independent Advisory Panel on Deaths in Custody (IAPDC) report which noted that ‘PCCs should lead local scrutiny Panels and expand their focus to include the examination of data relating to custody performance,’ national guidance has been provided to assist PCCs and Chief Constables decide how best to implement this in their respective forces. The report proposes that the City of London use existing scrutiny from ICVs and the Independent Advisory and Scrutiny

Group (IASG) to commence this work, with a view to developing this as the groups stabilise through volunteer recruitment and under the leadership of new Chairs.

Recommendation(s)

It is recommended that Members note the content of this report and note the proposed implementation of the Custody Detention Scrutiny Panel approach for the City of London.

That an annual report on custody is provided to PAB, to contain an overview of custody issues and include management information and data on vulnerability, use of force and EDI.

Main Report

Background

1. The Independent Custody Visitors (ICV) Scheme, formerly known as Lay Visiting, was introduced in the first half of 1981 following a recommendation in Lord Scarman's report into civil disturbances and outbreaks of spontaneous unrest in major cities throughout the country – in Bristol, Liverpool, Manchester, the West Midlands and London (most notably the Brixton Riots of 1981).
2. The cause of these disorders centered around several complex political, social and economic factors. Many of the concerns expressed focused on a loss of confidence and mistrust in the police and their methods of policing, particularly across Black and global majority communities.
3. The resulting investigation (the Scarman Report) included several recommendations about law reform, community relations and policing practices. It advocated for a system of independent, unannounced inspection of procedure and detention in police custody by members of the local community to inspect the way police detained people in their custody.
4. Since the production of this report, panels of ICV have evolved throughout the United Kingdom as an essential means of securing police accountability for the local communities they serve.

The Police and Criminal Evidence Act 1984

5. Many of the Scarman Report recommendations were included in the Police and Criminal Evidence Act (1984) and subsequent revisions in 2008 and 2013. This Act sets out the way in which police officers must perform their roles and stated specific codes of practice for police procedures; most commonly, under Code C of the PACE Act which established the rights of people detained in police custody for a suspected crime or offence.

The Police Reform Act 2002

6. Section 51 of the Police Reform Act (as amended) places a statutory obligation on local policing bodies in England and Wales to make arrangements for detainees to be visited by ICVs. Local Policing Bodies are responsible for recruiting, selecting and appointing ICVs.
7. These guidelines and codes of practice provide the main reference point for independent custody visitors as they carry out inspection and check on the treatment and welfare of people held in police custody and play a vital role as:
 - i) the only fully independent review of detainee treatment of those in police detention
 - ii) independent check on the extent to which the rights of individuals detained in police custody are being respected.

City of London Independent Custody Visiting Scheme – current position

8. An annual report providing an overview of the operation of the City's ICV Scheme is submitted to the Police Authority Board for information (most recently in October 2023). In September 2023, the City Scheme was assessed as being 'compliant' against the requirements set out in the Independent Custody Visiting Association's Quality Assurance Framework (QAF).
9. Since October 2023, membership of the City of London ICV Scheme has reduced from seven volunteers to four. This reduction occurred as a result of one member resigning, a second member withdrawing from the City Scheme and the untimely passing of the Chair in December 2023.
10. The vetting and retention of ICVs has been impacted by a number of factors, these include: prioritisation of the vetting of Police Officers to ensure that the CoLP Police Uplift Programme national commitments were met, some ICV members not wanting to be vetted to the level required and some delays in the vetting team receiving application requirements from potential members.
11. These factors combined, have led to an overall reduction in membership and frequency of visits to Bishopsgate custody.
12. In response, the Police Authority Team and the City Police have developed and agreed a process to improve the effectiveness and efficiency of the on-boarding and ongoing maintenance of the ICV Scheme volunteers, providing clarity on roles and responsibilities. This process is included at appendix 2. The process has been implemented and communicated with the existing ICV cohort and will be shared with new volunteers joining the Scheme.

13. The on-boarding process has been added to the Force's internal ICV Standard Operating Procedure (SOP) and guidance on the vetting procedure taken from this document has been shared with the Police Authority Team. This will assist with enquiries from potential ICVs about the information required and why this is necessary.
14. To ensure that the City Scheme continues to meet its statutory requirements in relation to custody visiting practices, the City ICV Scheme Manager undertook a recruitment campaign, which saw the distribution of an ICV Recruitment Advertisement via a range of Corporation channels in March and April 2024.

This advert was distributed through a range of established Corporation resident communication channels in March and April (2024)
 - a) *Inclusion of ICV recruitment advert details in Estates, Community and Children's Services, City Lending Library sites and corporate communications channels*
 - b) *Outreach routes via Livery Companies and their networks*
 - c) *Further engagement with funded organisations working in the Criminal Justice space via City Bridge Foundation and Bridge House Estates colleagues.*
15. The internal recruitment exercise yielded five expressions of interest, which the Police Authority followed up directly with applicants in mid-April (2024).
16. It is anticipated that the Police Authority will be able to interview applicants in mid-June (2024) and progress NPPV2 Vetting Clearance for successful applicants to the Force once the interview process has concluded.
17. Nominations will be sought from members of the Independent Custody Visitors (ICV), for the position of Chair and Vice Chair by the start of the new financial year in April 2025. This will provide a sufficient period of time for applicants to attain NPPV2 clearance from the Force, and successfully complete a 6-month period of "on the job" training and mentoring whilst in their probationary period.
18. The probationary period will be focused on the undertaking of visits in tandem with experienced colleagues and will involve developing and consolidating skills at Bishopsgate custody, as well as discussing practical issues and difficulties after visits have been completed at local panel level.
19. Further refresher training will be provided throughout a member's term as ICV to ensure that they are smoothly integrated into the Panel and satisfactorily equipped to address legal, procedural and Health and Safety requirements and develop best practice emerging from the visiting process.
20. The Police Authority aims to provide a suitable balance of ICV in terms of factors such as age (18+), gender and ethnicity. This inclusive approach will

extend to those with disabilities, and those who do not have English as their first language. It will provide opportunities for the Police Authority Board to receive a more diverse range of insights on policing matters from members of the community.

21. More widely, the Police Authority will complete the onboarding process for newly appointed Independent Custody Visitors (ICVs) at the earliest opportunity and will work towards achieving its ultimate target of appointing eight new volunteers to the City Scheme.
22. The Police Authority will place a further five to six applicants on a wait list by December 2024, for the purpose of ensuring better operational resilience across the existing voluntary Scheme; and to demonstrate greater compliance ahead of the Independent Custody Visiting Association (ICVA) forthcoming Quality Assurance Framework Assessment (QAF) which is expected to commence in April 2025.
23. More widely, the Police Authority will ensure that vacancies for the City Scheme are well publicised with partners working in the Criminal Justice space, via means such as online community networks, resident newsletters, ebulletins and social media channels. Further vacancy details will also be placed with a small number of recruitment agencies to promote interest in joining the Scheme, in the event that existing recruitment channels do not yield suitable candidates.

Scrutiny of Custody Issues and Data – current position

24. Within the City of London Police, custody data relating to detainees and Equality, Diversity and Inclusion (EDI) is scrutinised at the monthly Custody Management Meeting, which reports into a quarterly Custody Management Group, chaired by the Superintendent in Criminal Justice Services and attended by partners including the ICV Chair and Police Authority Compliance Lead.
25. It has recently been agreed that custody EDI data will also form part of the product reported into the quarterly EDI Strategic Board, chaired by the Commissioner. This will ensure data on areas such as juvenile detainees, strip searching, use of force, mental health and ethnicity is scrutinised at a strategic level outside of Criminal Justice Services for increased transparency and governance.
26. The Force historically provided an annual update to PAB on the custody of vulnerable persons, with the last report received in November 2019. This report ensured oversight by PAB of custody EDI data, the risks being managed by custody officers and staff and the work being undertaken to improve outcomes for vulnerable detainees.

27. As the Force does not routinely report to PAB on custody at present, it is proposed that the annual update is resumed, to contain an overview of custody issues and include management information and data on vulnerability, use of force and EDI.
28. The Police Authority Compliance Lead provides an annual report to PAB on the ICV Scheme and it is further proposed that an annual custody update is provided to coincide with this, ensuring a full picture of custody issues and performance is presented for scrutiny.

Custody Detention Scrutiny Panels (CDSPs) – current position

29. All ICV Schemes in the United Kingdom work within the framework provided by the Police and Criminal Evidence Act (1984) and the Home Office Code of Practice on Independent Custody Visiting.
30. Whilst a wide range of legislation encapsulates lawful activity and HMICFRS determines compliance and areas for improvement, few mechanisms, other than independent custody visiting schemes exist for the regular, independent review of detainee treatment of those in police detention.
31. More recently, several independent reviews such as the *Lammy Review*, *Angiolini Review* and the *Commission on Race and Ethnic Disparities (CRED)* have identified issues of disparity and inequality in the Criminal Justice System which has led to a trust deficit between communities and the police.
32. An Independent Advisory Panel on Deaths in Custody (IAPDC) report noted that 'PCCs should lead local scrutiny Panels and expand their focus to include the examination of data relating to custody performance. These Panels could focus on data relating to disproportionality, as well as mental health and substance misuse prevalence.'
33. At present, various independent scrutiny Panels have already been established by PCCs and Police Forces across England and Wales to understand and address many aspects of disproportionality within specific policing environments (e.g. City of London Police IASG), however there has been no consistent approach nationally to addressing disproportionality within detention profiles.
34. Following support for the concept of Custody Scrutiny Panels by the NPCC and APCC, optional guidance on Custody Detention Scrutiny Panels (CDSPs) was developed in accordance with the National Custody Strategy to continue to increase transparency, further professionalise and improve police custody performance.
35. This guidance provides suggestions on areas including governance, training, scope and panel membership, but in recognition of the differences between forces and existing scrutiny arrangements, it is a decision for individual PCCs

and Chief Constables on how this scrutiny would operate within their respective force areas.

36. Representatives from the City Police have attended national briefing sessions, where some of the questions and issues raised by forces were discussed. Those forces who have adopted CDSPs report a variety of approaches, with some relying on existing scrutiny arrangements such as ICVs and others recruiting more widely from community groups and the third sector.
37. The recruitment and maintenance of multiple scrutiny panels is an issue experienced nationally and as a result many forces have started small, concentrating on specific issues such as strip search and use of force, rather than reporting on a broad range of topics from the start.
38. Due to the City of London's unique demographic and the work currently ongoing to recruit new volunteers for our ICV Scheme and IASG, both under new Chairs, we propose that the City of London adopts a similar approach in the initial stages. Presentations on CDSPs have been delivered at both ICV and IASG meetings and there has been some interest from members on involvement in this scrutiny.
39. Custody Management have been invited to present sample data to the IASG meeting on 22nd May 2024 to give an insight into the type of areas a CDSP would be expected to scrutinise. As a small force, using a combination of interested IASG and ICV members to commence some independent custody scrutiny is proposed as an initial way forward, whilst membership of both groups is stabilised. As with other forces, this will provide a foundation on which a CDSP can develop and will avoid a delay in starting this process. This clearly has benefits for transparency and improving public trust and confidence in a critical area of policing which manages a wide range of vulnerabilities.

Conclusion

40. Police Custody is an area of policing which manages a wide range of vulnerabilities on a daily basis. During their time in custody, a detainee is often at their most vulnerable, with unfamiliar and often unwelcome processes and procedures taking place, either as part of the investigative process or for detainee, officer and staff safety. Issues such as detention of juveniles, strip searches and use of force are understandably of public interest and concern; it is therefore right that police custody should be open to scrutiny and that we support the mechanisms to do this, through the effectiveness of our ICV Scheme and reporting of custody EDI data through formal governance structures, both internally and externally. Additional public scrutiny through the instigation of CDSPs will further this ambition and help to increase transparency and public confidence in what can be a divisive area of policing.

Appendices

Appendix 1 – Home Office Code of Practice on Independent Custody Visiting

Appendix 2 – City of London Police Independent Custody Visitor Onboarding process



Home Office

Code of Practice on Independent Custody Visiting

March 2013

Introduction

1. This Code of Practice on independent custody visiting is issued in accordance with section 51 of the Police Reform Act 2002, as amended by section 117 of the Coroners and Justice Act 2009 and paragraph 299 of Schedule 16 to the Police Reform and Social Responsibility Act 2011. Local policing bodies and independent custody visitors (ICVs) shall have regard to the Code in carrying out their relevant functions. Throughout this Code, the term 'police and crime commissioners' includes the Mayor's Office for Policing and Crime (MOPAC) (in respect of the Metropolitan Police Service) and the Court of Common Council of the City of London Corporation (in respect of the City of London Police).
2. Independent custody visiting is the well established system whereby volunteers attend police stations to check on the treatment of detainees and the conditions in which they are held and that their rights and entitlements are being observed. It offers protections and confidentiality to detainees and the police and reassurance to the community at large.
3. The Coroners and Justice Act 2009 extends independent custody visitors' remit to terrorist suspects in detention. This Code of Practice has been amended to set out how this would operate in practice - given the differences between terrorist and non-terrorist investigations and statutory frameworks, there are differences in how independent custody visiting operates in relation to terrorist suspects in detention.
4. The Code is supported by more detailed National Standards, which expand on the relevant procedures and systems and set out established good practice.

Legislation

5. Section 51 of the Police Reform Act 2002 (as amended) requires Police and Crime Commissioners in England and Wales to make arrangements for detainees to be visited by ICVs. Such arrangements may make provision for access to detainees by ICVs, examination of records, inspection of detention facilities and provision of a Code of Practice.
6. Section 117 of the Coroners and Justice Act 2009 introduces two changes to legislation which are intended to strengthen the independent monitoring of the detention and treatment of suspected terrorist detainees. These two changes amend:
 - (a) Section 51 of the Police Reform Act 2002 to ensure that the arrangements made by PCCs for ICVs include a requirement that reports about visits made to suspected terrorist detainees are submitted to the Independent Reviewer of Terrorism Legislation (IRTL) as well as to the PCC. The amendments also allow ICVs to listen and view audio and video recordings of interviews with suspected terrorist detainees, subject to any restrictions on such access, which must be specified in this Code of Practice (please see paragraphs 66-72 for further information).
 - (b) Section 36 of the Terrorism Act 2006 (review of terrorism legislation) under which the IRTL is appointed and tasked with the annual review of the operation of the Terrorism Act 2000 (TACT) and the Terrorism Act 2006, Part 1. As amended, that provision states that the IRTL may in particular consider the treatment of terrorist suspects detained under a warrant of further detention under Schedule 8 to TACT.

7. While the provisions of the Police Reform Act 2002 cover only England and Wales, the remit of the IRTL covers the entire UK. Therefore, in this regard his remit to examine compliance with Schedule 8 and the relevant PACE (and PACE NI) Codes cover Great Britain and Northern Ireland and similarly to review the operation of equivalent terrorism legislation in Scotland. This Code of Practice applies to England and Wales only. However, in order for the IRTL to fulfil his duties under section 117, equivalent arrangements will be put in place in Northern Ireland and Scotland to ensure a consistent approach is taken throughout the UK.

Organisation and Infrastructure

8. Section 51(1) of the Police Reform Act 2002 places the responsibility for organising and overseeing the delivery of independent custody visiting with PCCs, in consultation with chief officers. PCCs must therefore ensure that they have in place robust and effective procedures for establishing and maintaining their independent custody visiting schemes, including the allocation of appropriate resources to this function.
9. Overall responsibility for the central administration of the scheme must be given to a nominated officer on the PCC staff, supported as necessary by other personnel and resources.
10. At police area level, groups or panels of volunteers must be organised to visit police stations in the area. Every group needs to have its own co-ordinator locally, supported by the PCC's staff. Paragraphs 23-24 below explain the arrangements for ICVs who are accredited to visit TACT detainees.

Recruitment and Conditions of Service

Organising Recruitment

11. PCCs are responsible for recruiting, selecting and appointing ICVs and must ensure these functions are adequately resourced.
12. Adequate numbers of suitably trained and accredited ICVs must be available at all times. Paragraphs 23-24 explain the arrangements for ICVs who are accredited to visit TACT detainees.

The Recruitment Process

13. Recruitment must be based on clear role descriptions, as well as person specifications setting out the qualities ICVs require to carry out their role effectively.
14. Recruitment must be open, non-discriminatory and well publicised.
15. All selections must be made on the basis of a standard application form with adjustments based on local circumstances.
16. No person shall be appointed as an ICV without an interview taking place. The selection panel must record the reasons for decisions about appointment or non-appointment. Any appointment must be made solely on merit. Any appointment is subject to vetting or security clearance for all custody visitors to an appropriate level as determined by the Home Office.

ICVs who visit TACT detainees must have Security Check (SC) level clearance and have undertaken the specific training provided for visiting TACT detainees (see paragraphs 37-38 for details of the training). Before renewing the appointment of an individual ICV, PCCs must ensure that appropriate vetting or security clearance remains valid until the end of the period of appointment (see paragraph 29 below).

17. All ICVs must be at least 18 years old and must be living or working within the police area, having been resident in the UK for at least 3 years prior to the date of application. ICVs accredited to visit TACT detainees will need to have completed the I training and is a condition of selection for this role. ICVs must have successfully completed 18 months of PACE custody visits before they can be considered for TACT detainee visits. Paragraphs 37-38 provide more detail on the training for these roles.

Who should be selected?

18. The PCC must seek to ensure that the overall panel of ICVs is representative of the local community and provides a suitable balance in terms of age, gender and ethnicity.
19. All reasonable adjustments, as defined in the Equality Act 2010, must be made to accommodate those with a disability. Where it is proposed to appoint as an ICV an individual who does not have English as their first language, but who is able to communicate effectively so as to be understood, and is otherwise considered to be a suitable candidate, he/she must be informed that visits with detainees are carried out in English as is all documentation relating to detainees.
20. Visitors must be independent persons who are able to make informed and justified judgements and unbiased observations in which the community can have confidence and which the police will accept as fair criticism.
21. Where an applicant has one or more convictions for criminal offences, or has received any formal caution, warning or reprimand, or has failed to disclose any such finding, the specific circumstances must be considered in assessing suitability to become an ICV. However, past offending is not an automatic barrier to acceptance. The chief officer should provide advice to enable the PCC to make a decision with regard to the suitability of each applicant. The PCC should be informed by the chief officer as to the reason(s) for recommending that a volunteer should not be appointed. Ultimately, the PCC is responsible for all appointments of ICVs – subject to meeting the requirements (for example vetting) set out in this guidance.
22. In appointing ICVs, care must be taken to avoid any potential conflict of interest. For example, serving police officers and other serving members of police or PCC staff will be unsuitable for that reason. The same will apply to special constables, justices of the peace, members of police and crime panels or PCCs. All applications must be considered on their merit.

ICVs visiting TACT detainees

23. The selection of ICVs for TACT detainee visits will draw on the existing structures whereby ICVs are associated with schemes administered by individual PCCs and carry out visits only in that police area.
24. ICVs for TACT detainee visits will be drawn from those areas where terrorism detention takes place.

Other Possible Roles for Custody Visitors

25. ICVs may also act as appropriate adults. However, individuals must not switch between those roles during the course of a visit to the same police station and must declare if they have previously carried out either role with the same detainee. An individual cannot perform both roles (i.e. acting as an appropriate adult and an ICV) simultaneously for the same detainee.
26. ICVs may also act as lay observers appointed under section 81 of the Criminal Justice Act 1991 to inspect the conditions under which prisoners are transported and held.

Basis of Service

27. The PCC must provide each ICV with a written memorandum of understanding summarising their agreed responsibilities and the legitimate expectations of both parties.
28. The PCC must provide each ICV with an identity pass as their authority to visit any police station in the force area that is holding detainees on a regular or temporary basis.

Tenure

29. Appointments as an ICV must initially be for three years and must not be confirmed until a six-month probationary period has been satisfactorily completed. Full re-assessments of suitability must take place at regular intervals but no longer than three years apart. The key factors in renewing appointments for further periods must be the continuing ability and willingness of the individuals involved to do the job effectively. Any decision not to renew the appointment must follow the principles of natural justice and must be publicised in the scheme's memorandum of understanding or guidance. There are additional training and selection requirements for TACT ICVs as set out in paragraphs 37-38.

Removal

30. A PCC can terminate an ICV's appointment because of misconduct or poor performance.
31. Procedures for considering possible termination of appointment must follow the principles of natural justice and must be publicised.

Complaints Procedures

32. Procedures must be in place to deal with complaints against ICVs by detainees, police personnel or others. Equally, there must also be a clear mechanism for handling any complaints from visitors.

Payment

33. ICVs are entitled to be reimbursed for their legitimate expenses incurred in carrying out their role.

Insurance

34. The PCC must ensure adequate cover and provision for claims arising from an ICV's role.

Training

35. The basic responsibility for initial and ongoing training lies with the PCC and a structured plan with clear objectives must be developed in consultation with the police service and the local independent custody visiting community.
36. The PCC must evaluate the effectiveness of training and the extent to which it is achieving its objectives.

Training, selection and guidance for ICVs visiting TACT detainees

37. The Independent Custody Visiting Association (ICVA), with Home Office support, is responsible for developing and keeping under review an additional training package for ICVs visiting TACT detainees. Training will cover an explanation of the legal framework, review process, arrangements for visits, the role of the IRTL and how ICVs will work with the IRTL in carrying out their functions, and the conduct and reporting of visits.
38. Training for ICVs visiting suspected TACT detainees is part of the selection process, and successful completion of training is a condition of selection for this role. ICVs must have successfully completed eighteen months of PACE custody visits before they can be considered for TACT detainee visits. Selection, performance management and de-selection of ICVs is the responsibility of the relevant PCC.

Frequency and Coverage

39. The PCC should liaise with the chief officer about the frequency with which visits should be carried out.
40. Visits must be sufficiently regular to support the effectiveness of the system, but not so frequent as to interfere unreasonably with the work of the police.
41. The frequency of visits must be monitored against expectations and reported to the PCC at regular intervals. Where insufficient visits are taking place, the causes must be investigated and corrective action taken.
42. Consideration must be given to making visits to all police stations where detainees are held even where they are only accommodated for relatively short periods of time.

Visiting TACT detainees

43. In respect of PACE detention, ICVs regularly conduct unannounced visits to police stations. This element of “spot-checking” is an important tool in ensuring ICVs are able to provide an accurate “snapshot” account of detention conditions. Appropriately trained and security cleared ICVs may still undertake unannounced visits to terrorism detention suites, but given the low number of TACT arrests in comparison to PACE arrests, it is unlikely that a terrorist suspect will be in detention during visits which are conducted on an ad-hoc basis. For this reason, the relevant ICV scheme administrator will be notified when terrorist arrests take place and where those arrested are being detained.
44. This notification will be made by the police custody officer as soon as practicable after the detainee has arrived at the detention suite.

45. The ICV scheme administrator will inform appropriately trained and security cleared ICVs that an individual has been arrested under TACT and of the detention facility at which they are, or will be, held.
46. One of the nominated ICVs will make contact with the police custody detention suite to inform them of their intention to visit. The selected pair of ICVs may visit unannounced but a police officer of at least Inspector rank may delay access until such a time as is practicable (as set out in Section 51(4)(a) of the Police Reform Act 2002 and in paragraphs 49 and 55 of this Code). The police will accommodate an initial visit as early as possible, although visits may need to be delayed where multiple arrests take place simultaneously in order to allow suspects to be “booked in”. This ensures that suspects are able to receive notice of their statutory rights, and to exercise their right to inform someone of their arrest and receive legal advice. The process also ensures that the police are able to collect any necessary physical evidence from a person for analysis (e.g. forensic samples, DNA profiles, fingerprints etc). However, ICVs should be able to conduct an initial visit as soon as is practicable after the detainee has arrived at the detention suite.
47. Pre-charge detention under TACT can continue up to a maximum of 14 days. Therefore, subsequent visits by appropriately trained ICVs may be appropriate but this will depend on the length of the detention. Subsequent visits may take place until the detainee is charged or released. As a matter of good practice, different pairs of ICVs should visit the same detainee in the same pre-charge detention period. The police cannot direct when ICVs should conduct their visits; ICVs can visit a detainee whenever they wish – subject to the detainee’s consent (see paragraphs 64 and 72).

Working arrangements

Conducting visits

48. To ensure the safety and wellbeing of volunteers, visits must be undertaken by pairs of ICVs working together.

Visiting Procedures at Stations

49. ICVs must be admitted to the custody area immediately. Delay is only permitted when immediate access may place the visitors or another individual within the custody area in danger. A full explanation must be given to the visitors as to why access is being delayed and that explanation must be recorded by the visitors in their report.
50. ICVs must have access to all parts of the custody area and to associated facilities, such as cell accommodation, washing and toilet facilities, facilities for the provision of food and medical rooms (which in some cases, may only be accessible when the force’s healthcare practitioner is present) for the purposes of inspection. However, it is not part of their role to attend police interviews with detainees. Custody visitors will be allowed access to CCTV cameras and systems (in PACE detention facilities) to ensure that they are operational.
51. Police staff must be alert to any specific health or safety risks ICVs might face and must advise them appropriately at the commencement of the visit.
52. The custody officer or a member of custody staff must accompany ICVs during visits (subject to paragraph 58).

Access to Detainees

53. Subject to the exceptions referred to in paragraph 55, ICVs must be allowed access to any person detained at the police station. However, only ICVs who have undergone the appropriate security vetting and training will be permitted access to TACT detainees, irrespective of where they are being held. Detainees may only be interviewed with their consent which will be established either by:
- i) self-introduction – the ICVs will introduce themselves and their purpose and seek permission to speak to the detainee
 - ii) the escorting officer explaining the purpose of the ICV visit and asking the detainee whether they are willing to speak with the visitors.
54. Juveniles may be spoken to with their own consent. If, for whatever reason, a detainee is not in a position to give consent, the escorting officer must allow the visit unless any of the circumstances set out in paragraph 55 apply.
55. In accordance with section 51(4) of the Police Reform Act 2002, the custody officer may limit or deny ICVs access to a specific detainee only if authorised by an officer of, or above, the rank of Inspector and where either of the following specified grounds apply:
- i) after a risk assessment has been carried out the officer reasonably believes that to be necessary for the visitors' safety, or
 - ii) if the officer reasonably believes that such access could interfere with the process of justice.
56. Where any of the circumstances referred to in paragraph 55 apply, consideration should be given to allowing the visitors some limited form of access to the detainee, such as speaking through the cell hatch or seeking consent to view the custody record. Such a delay under the specified ground at paragraph 55 would not prevent the ICVs from inspecting the rest of the detention facility.
57. Any decision to deny or limit access must be recorded in the detainee's custody record (together with the relevant authorisation) and by the ICVs in their report of the visit.

Discussions with Detainees

58. Discussions between detainees and ICVs must, wherever practicable, take place in the sight, but out of the hearing, of the escorting police officer. Where this is not possible, the police officer will not take any active part in the conversation. Police officers should not actively listen to conversations between ICVs and detainees. For TACT detainees, discussions may take place in either the interview room, the solicitor's consulting room or some other convenient place.
59. Discussions must focus on checking whether detainees have been offered their rights and entitlements under PACE, their health and wellbeing, and the relevant safer detention guidelines and confirming whether the conditions of detention are adequate.
60. ICVs must remain impartial and must not seek to involve themselves in any way in the process of investigation. If a detainee seeks to make admissions or otherwise discuss an alleged offence, the visitor must tell them that the relevant contents of the visit will be made known to the custody officer and may be disclosed in legal proceedings.

61. If an ICV realises they know or are known by a detainee, they must declare this and consider whether to withdraw from the visit.
62. ICVs must not pass messages to or from detainees or offer to perform other tasks on their behalf. If they are asked to do so they must immediately inform the custody officer.
63. If a detainee indicates to an ICV that they may harm themselves or any other person, this must immediately be brought to the attention of custody staff.
64. Subject to obtaining the detainee's consent to examine their custody record, the ICVs should check its contents against what they have been told by the detainee. This will provide ICVs with an overview as to how the detention has been carried out. ICVs may also have access to other relevant documentation, which relates to a detainee e.g. risk assessment. All such information must be treated confidentially.
65. If a detainee is for any reason incapable of deciding whether to allow access to their custody record, the presumption must be in favour of allowing the ICVs to examine it.

Audio and video recording of TACT interviews

66. ICVs visiting TACT detainees may request that they are given access to audio or video recordings of interviews. ICVs may only request access to the whole or part of the audio or video recordings of any interview that has been conducted during the period of detention:
 - a) at the request of the detainee; or
 - b) where the ICVs have particular concerns about the conduct of an interview (the consent of the detainee will still be required).

Such a request will only be in order to:

- a) ensure that the detainee has been offered their rights and entitlements under TACT;
 - b) that their health and wellbeing has been ensured throughout; and
 - c) that the relevant statutory code of practice has been followed .
67. Given the interests of the detainee will be protected by their legal representative and, if relevant, an appropriate adult, during the interview, the ICV will not routinely need to access audio or video recordings of TACT interviews. Should the ICV continue to have concerns after viewing the recording, they should take this up as soon as possible with the custody officer in order to seek a resolution and follow the complaints procedures set out in the PCC arrangements.
 68. Access to the whole or part of an audio or video recording of an interview may only be denied to ICVs if:
 - (a) it appears to an officer of, or above, the rank of inspector that there are grounds for denying access (as set out in paragraph 69) at the time it is requested; and
 - (b) the procedural requirements imposed by the arrangements in relation to a denial of access to such recordings are complied with.

69. The only permitted grounds for denying access to the whole or part of an audio or video recording of an interview under paragraph 68 (a) above are:
 - a) if the officer reasonably believes that it is not practicable to provide access at the time it is requested; or
 - b) if the officer reasonably believes that such access could interfere with the process of justice.
70. In the case of access being denied to audio or video recordings, an explanation must be given to the ICVs and this must be recorded on both the visit report form and the custody record.
71. ICVs will not be permitted to watch or attend live interviews of terrorist suspects.
72. ICV access to audio or video recordings of interviews must always be subject to obtaining the consent of the detainee. Consent will need to be obtained at each separate visit.

Medical Issues

73. ICVs have no right to see the detainee's medical records, even where these are attached to the custody record. However, key points relevant to medical treatment required while in custody should be recorded in the custody record itself and may be viewed.

Dealing with Issues and Complaints

74. Where a detainee makes a complaint or raises an issue about their general treatment or conditions, ICVs must (subject to the detainee's consent) take this up as soon as possible with the custody officer in order to seek a resolution. The same applies to similar issues identified by visitors in the course of their attendance.
75. If a detainee makes a complaint of misconduct by a specific police officer, they must be advised to address it to the duty officer in charge of the police station.

Effective Working Relationships

76. For independent custody visiting to be effective, it is essential that visitors and police staff develop and maintain professional working relationships based on mutual respect and understanding of each others' legitimate roles.

Reporting on a Visit

77. At the end of each visit, and while they are still at the police station, ICVs must complete a report of their findings to include conditions and facilities, rights and entitlements and health and well being. One copy of the report must remain at the station for the attention of the officer in charge. Copies must go to the PCC and other parties as determined locally.
78. Report forms must include an undertaking not to reveal the names of persons visited or other confidential information obtained in the course of a visit.

TACT detainees

79. Reports of visits should be submitted to the IRTL and to the PCC for both the police station where the suspect was held and also the police area in which the arrest was made. Co-ordination of reports will be done via the PCC and the ICV Scheme Administrator.

Feedback

80. Systems must be in place to ensure that the output from visits is drawn rapidly to the attention of those in a position to make the appropriate response.
81. The PCC is responsible for drawing together issues and identifying trends emerging from visits in their area and addressing these with relevant police supervisors.
82. The PCC must have a regular and formal opportunity to raise concerns and issues with a designated senior officer with force-wide responsibilities. It will usually be appropriate for that officer to be of at least Assistant Chief Constable/Commander rank. Regular reports shall be provided by the administrator of the scheme to the PCC. These reports must be discussed at PCC meetings as appropriate and reflected in an entry about independent custody visiting in the PCC's own annual report.
83. In addition, for TACT detainees the IRTL may choose to follow up issues separately.

Sharing Experience

84. The PCC must ensure that ICVs have regular opportunities to meet together to discuss their work.

Reviewing Performance

85. PCCs must take steps to assess how effectively their independent custody visiting arrangements are working. Key aspects of that process will be having regard to the National Standards, including quality assurance in respect of reports, remedial actions taken by the police in response to issues raised, the frequency with which visits take place and the number of occasions on which detainees refuse to speak to visitors.

Home Office

CoLP On-Boarding Process for Independent Custody Visitor Scheme

Onboarding

1. The Police Authority Team, as the Hiring Manager, will provide HR with the names of the Independent Custody Visitor (ICV) candidates via the CoLP HR Services Mailbox.
2. HR will initiate the volunteers onboarding process and forms for Vetting are sent to candidates (as well as the vetting information sheet) to enable the candidate to be officially logged onto CoLP systems.
3. On receiving the requested documents and photo ID from the candidate and relevant checks being completed, HR will update the candidate profile and send the candidate details and vetting documents to the CoLP Vetting Unit.
4. The Vetting Unit will vet each ICV candidate to NPPV2/CTC. A second vetting link will be provided by the Vetting Unit if the first expires. A third and final link will only be issued in exceptional circumstances. Thereafter, the vetting application will be closed and no longer progressed. The Vetting Unit will update the applicant's file on CoreVet to this effect and inform HR Services so that the Hiring Manager is informed.
5. Communication with the Vetting Unit will primarily be via email for record-keeping and audit purposes. It is the responsibility of the Police Authority Team to ensure that a valid email address is provided. It is the responsibility of the candidate to ensure that their various email folders (including Junk) are checked for communications from the Vetting Unit.
6. Any candidates who fail vetting are written to by the Vetting Unit informing them as such as well as provided information about appealing the decision. The Vetting Unit will inform HR of any refusal, and it is HR who record this and notify the Police Authority Team.
7. The Vetting Unit will inform HR of those candidates who have achieved vetting clearance. HR will inform the Police Authority Team of this (as the Hiring Manager), in addition to notifying Information Management Services (IMS).
8. On receipt of information from HR confirming that vetting clearance has been achieved, IMS will issue valid passes for the ICV volunteer. It is the responsibility of the Police Authority Team to arrange for the collection and distribution of these passes to their members.
9. The personal data of the ICV candidates will be processed and stored in line with relevant legislation and authorised professional practice.

On-going Maintenance

1. The Vetting Unit will issue the annual Security Appraisal Form (SAF1) to the ICV candidate, in line with policy. The candidate is expected to complete this.
2. As the Hiring Manager, the Police Authority Team will receive the SAF2 for their completion. This process enables periodic monitoring and review, helping to safeguard CoLP systems, data and estates from individuals who present conduct or security concerns.
3. On receipt of the completed SAF forms (1 and 2), the Vetting Unit will review them and take action deemed appropriate, which could include initiating a re-vet process and/or suspending vetting clearance.

Offboarding ICVs

If an ICV leaves the scheme either through resignation or dismissal, the Hiring Manager must inform HR Services so that the respective databases can be updated (IMS, Vetting, HR) and property returned.

This differs from those instances where an ICV becomes 'in active' for a short period of time, such as through ill-health. In this instance, since it is an operational matter, the CoLP Custody Manager will inform IMS thereby allowing for appropriate safeguards to be put in place in relation to their pass.

At any point, if security or conduct concerns arise about an ICV, the Vetting Unit must be informed.

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