



City of London Police Authority Board

Date: WEDNESDAY, 4 DECEMBER 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 JP | Andrew Lentin (External Member) |
| Jason Groves | Sir Craig Mackey (External Member) |
| Deputy Madush Gupta | Michael Mitchell (External Member) |
| Alderman Timothy Hailes JP | |

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

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<https://www.youtube.com/@CityofLondonCorporation/streams>

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**

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

3. **MINUTES**

To approve the public minutes and the non-public summary of the meeting held on 2 October 2024.

For Decision
(Pages 9 - 14)

4. **RECENT SUBCOMMITTEE MINUTES**

To receive the public minutes and non-public summary of the following subcommittees

- a) Economic and Cyber Crime Committee 16 September 2024 (Pages 15 - 18)
- b) Resource Risk and Estates Committee 18 September 2024 (Pages 19 - 22)
- c) Professional Standards and Integrity Committee 25 September 2024 (Pages 23 - 26)
- d) Strategic Planning and Performance Committee 26 September 2024 (Pages 27 - 30)

5. **OUTSTANDING REFERENCES**

Joint report of the Town Clerk and Commissioner.

For Information
(Pages 31 - 32)

6. **CHAIR'S PUBLIC UPDATE**

The Chair to be heard.

For Information
(Pages 33 - 34)

7. **COMMISSIONER'S UPDATE**

Commissioner & Chief Officers to be heard.

For Information
(Pages 35 - 38)

8. **CITY OF LONDON CORPORATION RISK MANAGEMENT POLICY**

Report of the Chief Strategy Officer.

For Decision
(Pages 39 - 66)

9. **CITY OF LONDON POLICE AUTHORITY BOARD - TERMS OF REFERENCE REVIEW**

Report of the Town Clerk.

For Decision
(Pages 67 - 70)

a) **ANNUAL CUSTODY UPDATE** (Pages 71 - 84)

Report of the Commissioner.

b) **INDEPENDENT CUSTODY VISITING SCHEME ANNUAL REPORT 2023/24**
(Pages 85 - 98)

Report of the Town Clerk.

11. **TERRORISM (PROTECTION OF PREMISES) BILL - 'MARTYN'S LAW'**

Report of the City Remembrancer.

For Information
(Pages 99 - 104)

12. **EQUITY, DIVERSITY, INCLUSIVITY (EDI) UPDATE***

Report of the Commissioner.

For Information
(Pages 105 - 126)

13. **POLICING PLAN 2025-28 UPDATE***

Report of the Commissioner.

For Discussion
(Pages 127 - 140)

14. **REVENUE AND CAPITAL MONITORING UPDATE - Q2 2024/25***

Report of the Commissioner.

For Information
(Pages 141 - 178)

15. **MODERN SLAVERY STATEMENT 2024-2029***

Report of the Town Clerk.

For Information
(Pages 179 - 226)

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

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

18. **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

19. **NON-PUBLIC MINUTES**

To approve the non-public minutes of the meeting held on 2 October 2024.

For Decision
(Pages 227 - 230)

20. **NON-PUBLIC OUTSTANDING REFERENCES**

Joint Report of the Town Clerk and Commissioner.

For Information
(Pages 231 - 232)

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

The Chair to be heard.

For Information
(Pages 233 - 234)

22. **COMMISSIONER'S NON PUBLIC UPDATE**

The Commissioner & Chief Officers to be heard.

For Information
(Verbal Report)

23. **FRAUD AND CYBER CRIME REPORTING AND ANALYSIS SERVICE - REGULAR PROGRAMME PROGRESS REPORT***

Report of the Commissioner

For Information
(Pages 235 - 250)

24. **CITY OF LONDON POLICE - STAFF "PULSE" SURVEY RESULTS***

Report of the Commissioner.

For Information
(Pages 251 - 254)

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

Report of the Commissioner.

For Information
(Pages 255 - 312)

26. **CITY OF LONDON POLICE MEDIUM TERM FINANCIAL PLAN UPDATE***

Report of the Commissioner.

For Information
(Pages 313 - 336)

27. **CITY OF LONDON PAY AWARD 2024/25 - UPDATE FOLLOWING TRADE UNION ENGAGEMENT***

Joint report of the Chamberlain and the Chief People Officer.

For Information
(Pages 337 - 364)

28 a) **FUTURE POLICE ESTATES*** (Pages 365 - 380)

Joint report of the City Surveyor and Commissioner.

b) **FUTURE POLICE ESTATES INCL SALISBURY SQUARE DEVELOPMENT PROGRAMME DASHBOARD** (Pages 381 - 384)

Report of the City Surveyor.

- c) **GUILDHALL YARD EAST*** (Pages 385 - 412)

Joint report of the Commissioner and the City Surveyor.

29. **POLICE CYBER ALARM APPROVAL TO PUBLISH TENDER PRIOR TO NEW PROCUREMENT***

Report of the Commissioner.

For Information
(Pages 413 - 430)

- 30 a) **STRATEGIC COMMUNICATIONS AND ENGAGEMENT PLAN FOR ECONOMIC AND CYBER CRIME*** (Pages 431 - 458)

Joint report of the Town Clerk and the Commissioner.

- b) **COMMUNITY ENGAGEMENT QUARTERLY UPDATE & MEASURES OF THE STRATEGIC PLAN *** (Pages 459 - 464)

Report of the Commissioner.

31. **REPORT OF ACTION TAKEN - COLP IT REFRESH**

Report of the Town Clerk.

For Information
(Pages 465 - 468)

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

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

Part 3 - Confidential Agenda

34. **OPERATION ADDINGTON REPORT***

Report of the Commissioner.

For Information

35. **POLICE PAY - LONDON ALLOWANCE**

Report of the Commissioner.

For Information

36. **CHIEF OFFICER UPDATE**
Report of the Commissioner.

For Information

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CITY OF LONDON POLICE AUTHORITY BOARD Wednesday, 2 October 2024

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

Present

Members:

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

Officers:

| | |
|---------------------|-----------------------------------|
| Ian Thomas CBE | - Town Clerk's Department |
| Greg Moore | - Town Clerk's Department |
| Richard Riley CBE | - Town Clerk's Department |
| Kezia Barrass | - Town Clerk's Department |
| Oliver Bolton | - Town Clerk's Department |
| Josef Shadwell | - Town Clerk's Department |
| Charles Smart | - Town Clerk's Department |
| Caroline Al-Bayerti | - Chamberlain's |
| Zakki Ghauri | - Chamberlain's |
| Frank Marchione | - Comptroller and City Solicitors |
| Ian Hughes | - Environment |
| Bruce Hunt | - Remembrancers |

City of London Police:

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|--------------------|-------------------------|
| Pete O'Doherty | - City of London Police |
| Paul Betts | - City of London Police |
| Nik Adams | - City of London Police |
| Chris Bell | - City of London Police |
| Ally Cook | - City of London Police |
| Emma Cunnington | - City of London Police |
| Lorenzo Conigliaro | - City of London Police |
| Martin O'Regan | - City of London Police |
| Charlotte Rendle | - City of London Police |

1. **APOLOGIES**

Apologies were received from Dawn Wright, Andrew Lentin, Graham Packham and Michael Mitchell.

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

There were no declarations.

3. **MINUTES**

RESOLVED, – That the minutes of the meeting held on 4 September 2024 be approved as an accurate record.

4. **OUTSTANDING REFERENCES**

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

The Chair requested that the Police Authority team lead on the development of a paper and City of London Police's readiness for Martyn's Law and officers from the Remembrancer's department agreed to collaborate.

RESOLVED, – That the report be noted.

5. **CHAIR'S PUBLIC UPDATE**

Members received the Chair's public update.

RESOLVED, - that the Chair was heard.

6. **COMMISSIONER'S UPDATE**

Members received the Commissioner's public update. A Member congratulated the Commissioner on the recent media article relating to undercover efforts to combat phone snatching.

RESOLVED, - that the Commissioner was heard.

7. **STRATEGIC COMMUNITY ENGAGEMENT PLAN: KEEPING THOSE WHO LIVE, WORK AND VISIT THE CITY SAFE AND FEELING SAFE ***

Members received a joint report of the Commissioner and the Town Clerk which outlined a strategic community engagement plan concerning safety and security in the City, jointly owned by the City of London Police and the City of London Corporation.

During the discussion the following points were noted:

- The report had received significant scrutiny at Strategic Planning and Performance Committee on 25 September 2024, during which Members requested that attendance figures be recorded at cluster panel meetings (although attendance alone would not be a performance measure).
- The City of London Police were engaging in various methods of engagement with residents and businesses. A Member requested an amalgamation of the engagement report for the City of London Police's national responsibilities with local engagement to be produced for the next Police Authority Board. The Strategic Planning & Performance Committee would receive a quarterly report outlining key outcome performance

measures of strategic engagement, alongside key insights raised from the new Cluster Panel model including attendance and topics raised.

- Officers undertook to recirculate papers on Parkguard powers as a Member queried the role of Parkguard within wider community engagement.
- Members asked for additional local engagements to be included in the forward look, including next year's Stephen Lawrence Day, an annual Meet the Commissioner event, Summer parties at the Barbican, wardmotes, Cyber Griffin, broader crime prevention advice.
- Further engagement should be pursued with major trade associations, financial sector and licensed premises.

RESOLVED, - that the report be noted.

8. REVENUE AND CAPITAL MONITORING UPDATE – Q1 2024/25*

Members received a report of the Commissioner which provided an update on revenue and capital monitoring of Quarter 1 2024 – 2025.

RESOLVED, - that the report be noted.

9. QUARTERLY EDI UPDATE*

Members received a report of the Commissioner which provided a quarterly Equity, Diversity and Inclusion (EDI) update.

The Chair requested a report to outline the implementation plan for the EDI Strategy at the next Professional Standards and Integrity Committee meeting in November 2024.

Members warmly welcomed the fact that the City of London Police had been assessed by the Inclusive Employer's Standard (IES) and received a SILVER overall rating, which was in the top 20% of all Police Forces nationally.

RESOLVED, - that the report be noted.

10. REPORT OF ACTION TAKEN

Members received a report of the Town Clerk which outlined the actions taken under urgency procedures between Police Authority Board meetings.

Members discussed the possibility of using signage, including in connection with the City's police boxes, to create a hostile environment for those with intent to commit crime.

RESOLVED, - that the report be noted.

11. VICTIMS AND PRISONERS ACT 2024

Members received a report of the City Remembrancers which outlined the provisions of the Victims and Prisoners Act 2024 and its implications for the City of London Police and Police Authority Board.

RESOLVED, - that the report be noted.

12. CITY OF LONDON POLICE PENSIONS BOARD TERMS OF REFERENCE

Members received a report of the Town Clerk which sought approval to change the Terms of Reference as set out in the report.

RESOLVED, - that Members approved the suggested amendments to the Terms of Reference.

13. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**
There were no questions.
14. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
There were no items of urgent business.
15. **EXCLUSION OF THE PUBLIC**
RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.
16. **NON-PUBLIC MINUTES**
RESOLVED, - that the non-public minutes of the meeting held on 4 September 2024 be approved as an accurate record.
17. **CHAIR'S NON-PUBLIC UPDATE**
Members received the Chair's verbal non-public update.
The Chair provided a brief update on ongoing discussions about potential policing reform.
18. **COMMISSIONER'S NON-PUBLIC UPDATE**
Members received the Commissioner's non-public verbal update.
19. **THE NPCC CYBERCRIME PROGRAMME NATIONAL FRAMEWORK AGREEMENT**
Members received a report of the Commissioner which sought approval to extend the current framework agreement by a period of 12 months.
20. **SECURE CITY PROGRAMME (SCP) ISSUES REPORT**
Members received a joint report of the Commissioner and the Executive Director of Environment which provided an issue report for the Secure City Programme.
21. **COLP RISK REGISTER UPDATE***
Members received a report of the Commissioner which provided an update on the City of London Police risk register.
22. **FCCRAS - FINANCIAL IMPLICATIONS OF GO LIVE IN FEBRUARY 2025 AND FUNDING APPROACH**
Members received a report of the Commissioner which outlined the financial implications and funding approach of a FCCRAS Go Live date in February 2025.
23. **NPCC/APCC BUDGET SURVEY AND COLP MEDIUM TERM FINANCIAL PLAN CONSIDERATIONS ***
Members received a report of the Commissioner which outlined the NPCC/APCC budget survey and City of London Police medium term financial plan considerations.
24. **COLP PROPERTY STORE***

Members received a joint report of the Commissioner and the City Surveyor which provided an update on the City of London Police property store programme.

25. FUTURE POLICE ESTATE INCL. SALISBURY SQUARE DEVELOPMENT PROGRAMME DASHBOARD

Members received a report of the Chamberlain which provided the future police estate programme dashboard.

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

There were no questions.

27. 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.

28. APPOINTMENT OF THE COMMISSIONER FOR THE CITY OF LONDON POLICE

Members received a report of the Executive Director of People which outlined the process and proposed appointment of the Commissioner of the City of London Police.

The meeting ended at 12:43

Chairman

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

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**ECONOMIC AND CYBER CRIME COMMITTEE OF THE CITY OF LONDON
POLICE AUTHORITY BOARD
Monday, 16 September 2024**

Minutes of the meeting of the Economic and Cyber Crime Committee of the City of London Police Authority Board held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Monday, 16 September 2024 at 2.00 pm

Present

Members:

Deputy James Thomson (Chair)
Alderman Professor Emma Edhem
Jason Groves
Deputy Madush Gupta
Graham Packham
Mandeep Thandi
Deputy Dawn Wright
Naresh Sonpar
James Tumbridge

Officers:

| | |
|------------------|---------------------------|
| Richard Riley | - Town Clerks Department |
| Oliver Bolton | - Town Clerk's Department |
| Kezia Barrass | - Town Clerk's Department |
| Mary Kyle | - Innovation and Growth |
| Adam Summerfield | - Innovation and Growth |

City of London Police

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|-----------------|-------------------------|
| Andrew Gould | - City of London Police |
| Oliver Shaw | - City of London Police |
| Lucy Cumming | - City of London Police |
| Michael Orchard | - City of London Police |
| Chris Bell | - City of London Police |
| Eleanor Summers | - City of London Police |

1. APOLOGIES

Apologies were received from Tijs Broeke, Nicholas Bensted Smith, Deputy Chris Hayward and Sir Craig Mackey.

The Chair welcomed Mandeep Thandi to his first meeting of the Economic and Cyber Crime Committee.

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

There were no declarations.

3. MINUTES

RESOLVED, that the minutes of the meeting held on the 25 June 2024 be approved, subject to the amendment of the attendance of James Tumbridge.

4. **Q1 NATIONAL LEAD FORCE PERFORMANCE 2024/25**

Members received a report of the Commissioner which outlined the Q1 National Lead Force performance 2024/25.

Members welcomed the updated style of the report and suggested the use of comparative data and/or commentary to provide further context to the data included.

Members expressed concern that the abandoned call data had not been included, Officers recognised that the victims experience was the highest priority and outlined that the abandoned call metric would continue to be monitored. Officers to consider how to provide this data to Members in the most effective way.

Members also welcomed the offer of a detailed briefing at a future meeting on the seizure and storage of crypto-currencies.

RESOLVED, - that the report be noted.

5. **CYBER GRIFFIN UPDATE**

Members received a report of the Commissioner which provided an update on the Cyber Griffin programme.

During the discussion the following points were noted:

- Members queried if the programme would be taken to a national scale and were informed that this would be dependent on an upcoming Home Office spending review.
- Members suggested the that private sector could be interested in providing funding support for the programme. Officers agreed to follow up with Members directly.

RESOLVED, - that the report be noted.

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

Members received a report of Innovation and Growth, which provided an update of cyber and economic crime related activities within the department.

Members welcomed the report and felt that this work should be promoted widely across the square mile and beyond. The Chair agreed and suggested that this would be included in the Strategic Communications and Engagement plan for Economic Crime of the City of London Police and the Authority.

RESOLVED, - that the report be noted.

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

There was one question from a Member which related to the participation of Members when joining Committees virtually. It was outlined that for the Police Authority Board subcommittees, this participation would be at the discretion of the Chair.

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

There was no other business.

9. **EXCLUSION OF THE PUBLIC**

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

10. **NON-PUBLIC MINUTES**

RESOLVED, that the non-public minutes of the meeting held on 25 June 2024 be approved as an accurate record.

11. **UPDATE REGARDING ECONOMIC AND CYBER POLICE HEADQUARTERS (ECPHQ)**

Members received a report of the Commissioner which provided an update regarding economic and cyber police headquarters.

12. **STRATEGIC COMMUNICATIONS AND ENGAGEMENT PLAN FOR ECONOMIC AND CYBER CRIME**

Members received a joint report of the Town Clerk and the Commissioner which outlined the strategic communications and engagement plan for economic and cyber crime.

13. **FRAUD AND CYBER CRIME REPORTING AND ANALYSIS SERVICE - REGULAR PROGRAMME PROGRESS REPORT.**

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

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

There were no questions.

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

There was no other business.

The meeting ended at 15:42

Chairman

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

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RESOURCE, RISK & ESTATES (POLICE) COMMITTEE Wednesday, 18 September 2024

Minutes of the meeting of the Resource, Risk & Estates (Police) Committee held at Committee Rooms, Guildhall on Wednesday, 18 September 2024 at 11.00 am

Present

Members:

Alderman Timothy Hailes JP (Chair)
Tijs Broeke (Deputy Chair)
Helen Fentimen OBE JP
Deputy James Thomson
Deborah Oliver
Deputy Dawn Wright
Jacqui Webster
Deputy Randall Anderson
Michael Landau (External Member)

Officers:

Richard Riley CBE - Town Clerks Department
Kezia Barrass - Town Clerk's Department
Matt Lock - Chamberlain's Department

City of London Police

Paul Betts - City of London Police
Ally Cooke - City of London Police
Alix Newbold - City of London Police
Mark Paddon - City of London Police
Kate Lloyd - City of London Police
Steven Reynolds - City of London Police
Kelly Glazebrook - City of London Police
Chris Bell - City of London Police
Susan Penn - City of London Police
Martin O'Regan - City of London Police
Emma Cunnington - City of London Police

1. APOLOGIES

Apologies were received from Andrew Lentin.

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

There were no declarations.

3. MINUTES

RESOLVED, - that the public minutes and non-public summary of the meeting held 20 May 2024 were approved as an accurate record.

4. **PUBLIC OUTSTANDING REFERENCES**
Members received a report of the Town Clerk which outlined the public outstanding references.
RESOLVED – that the rep

5. **REVENUE AND CAPITAL MONITORING UPDATE Q1 2024/25**
Members received a report of the Commissioner which provided an update on Q1 capital and revenue monitoring 2024–2025.
Revenue
Members noted that the budget should not be balanced through employee vacancies, and noted consideration was required for how to build contingency into the budget once a fuller headcount had been achieved.
Capital
Members questioned the confidence levels of officers that the reprioritisation of projects would provide leeway required within the budget.
RESOLVED, - that the report be noted.

6. **CHIEF FINANCE OFFICER (CFO) AND CHIEF OPERATING OFFICER (COO) UPDATE**
Members received a joint report of the Commissioner and the Chamberlain, which provided an update from the Chief financial officer and Chief Operating Officer.
Members noted that the pensions administration team had been unable to meet the statutory deadline to provide pension statements to City of London Police officers by 31 August 2024. It was noted that multiple police forces had experienced the same issue. Officers agreed to report on the impact of the breach of the statutory deadline at the next committee.
RESOLVED, - that Members noted the report

7. **Q1 WORKFORCE MONITORING REPORT- 2024-25**
Members received a report of the Commissioner which provided an update on the workforce monitoring of Q1 2024-2025.
Members queried the increase in health and safety related reported incidents and were assured by officers that these incidents were monitored through numerous structures overseen by the Health and Safety Board.
Members noted that prolonged vacancies could impose risk to performance. Members queried the attrition rate of new probationers, officers agreed to report this data to the Committee.
RESOLVED, - that the report be noted.

8. **INTERNAL AUDIT UPDATE REPORT**
Members received a report of the Chamberlain which provided an update of Internal Audits.
RESOLVED, - that the report be noted.

9. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
A Member raised a question relating to the removal of decommissioned telephone boxes sited outside the former Museum of London site, and now the City of London School for Girls sixth form site. Officers agreed to discuss this outside of committee.

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

There was no other business.

11. EXCLUSION OF THE PUBLIC

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

12. NON-PUBLIC MINUTES

RESOLVED, that the non-public minutes of the meeting held on 21 May 2024 were approved as an accurate record.

QUARTERLY RISK REGISTER UPDATE

Members received a report of the Commissioner which provided a quarterly update on the Risk Register.

14A. FUTURE POLICE ESTATE UPDATE

Members received a report of the Commissioner which provided an update on Future Police Estates. Members considered this item in conjunction with item 14b.

14B. FUTURE POLICE ESTATE INCLUDING SALISBURY SQUARE DEVELOPMENT PROGRAMME DASHBOARD

This item was considered in conjunction with item 14a.

15. COLP FULL COST RECOVERY – UPDATE REPORT

Members received a report of the Commissioner which provided an update on City of London Police full cost recovery.

16. NPCC / APCC BUDGET SURVEY & COLP MEDIUM TERM FINANCIAL PLANS CONSIDERATIONS

Members received a joint report of the Commissioner and the Chamberlain which provided an overview of the NPCC/APPC budget survey and COLP medium term financial plan considerations.

17. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

There were no questions.

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

The Chair raised one item of business which related to a late report request on Operation Addington.

19. INDEPENDENT REVIEW OF OPERATION ADDINGTON – OUTCOME REPORT

This report was withdrawn.

The meeting ended at 13:00

Chairman

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

PROFESSIONAL STANDARDS & INTEGRITY (POLICE) COMMITTEE Wednesday, 25 September 2024

Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, Guildhall on Wednesday, 25 September 2024 at 1.45 pm

Present

Members:

Michael Mitchell (Chair)
Jason Groves
Deputy James Thomson
Jacqui Webster
Joanna Abeyie
Naresh Sonpar

Officers:

Richard Riley CBE - Town Clerk's Department
Kezia Barrass - Town Clerk's Department
Rachael Waldron - Town Clerk's Department
-

City of London Police

Paul Betts - City of London Police
Sanjay Anderson - City of London Police
Kate McLeod - City of London Police
Carly Humphries - City of London Police
Claire Cresswell - City of London Police
Jesse Wynne - City of London Police

1. APOLOGIES

Apologies were received from Florence Keelson-Anfu and Tijs Broeke.

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

There were no declarations.

3. MINUTES

RESOLVED, - that the public minutes and non-public summary of the meeting held on 4 June 2024 were agreed as an accurate record.

4. OUTSTANDING REFERENCES

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

RESOLVED, - that the report be noted.

5. QUARTERLY STOP AND SEARCH AND USE OF FORCE UPDATE (Q1)

Members received a report of the Commissioner which provided a quarterly update on the use of stop and search and use of force.

Members noted the small numbers reported for strip searches in the City and suggested that brief details could be included in future reporting to provide more context for this data.

Officers outlined that the importance of ensuring that the powers of stop and search and the use of force would be exercised in targeted and purposeful ways, to limit the impacts on the public.

Officers also noted that initial findings from the University of East London project looking at City of London Police stop & search data would be received shortly, the Chair requested that the Committee be sighted on the outcome of this work, once available.

RESOLVED, - that the report be noted.

6. **EQUITY, DIVERSITY, INCLUSIVITY (EDI) UPDATE**

Members received a report of the Commissioner which provided an update on Equity Diversity and Inclusivity within the City of London Police.

Members expressed an interest in receiving direct feedback from staff networks. Officers agreed to recommit to staff network events and consider appropriate methods of feedback from forums to the Committee.

Members welcomed the report and noted that this area of work was critical to build trust and confidence in the City of London Police.

The Chair stressed the importance of the Committee seeing an implementation plan for the new Equity, Diversity and Inclusion Strategy. Officers undertook to ensure that the Committee was also provided with the outcome of the Cultural Audit work in the City Police.

RESOLVED, - that the report be noted.

7. **Q1 ACTION FRAUD COMPLAINTS**

Members received a report of the Commissioner which outlined Action Fraud Complaints in Q1 2024 – 2025.

RESOLVED, - that the report be noted.

8. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q1**

Members received a report of the Commissioner which provided an update of professional standards, conduct and vetting from Q1 in 2024 – 2025.

Members requested that more detailed data be covered to include the ethnicity of the complaints reported, officers agreed to consider how to include this information.

RESOLVED, - that the report be noted.

16. **INCLUSIVE EMPLOYERS UPDATE**

The Chair agreed to move this item into the public session.

Members received a report of the Commissioner which provided an overview of the Inclusive Employers Standard (IES) accreditation process. The Chair, and members, congratulated the City Police on achieving a silver IES rating.

RESOLVED, - that the report be noted.

9. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions.
10. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
There was no other business.
11. **EXCLUSION OF THE PUBLIC**
RESOLVED, – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.
12. **NON-PUBLIC MINUTES**
RESOLVED, - that the non-public minutes of the meeting held on 4 June 2024 were approved as an accurate record.
13. **PROFESSIONAL STANDARDS, VETTING AND MISCONDUCT NON-PUBLIC APPENDICES**
Members received a report of the Commissioner which provided the non-public appendices to be read in conjunction with item 8.
14. **POLICE COMMITTEE REPORT DIP SAMPLES OF MISCONDUCT**
Members received a report of the Commissioner which provided dip samples of misconduct cases.
15. **VETTING REVIEW**
Members received a report of the Commissioner which provided a review of vetting arrangements.
17. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There was one question which related to the Independent Custody Visitor volunteers.
18. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There was no other business.

The meeting ended at 15:35

Chairman

Contact Officer: Kezia.Barrass

Kezia.Barrass@cityoflondon.gov.uk

STRATEGIC PLANNING & PERFORMANCE (POLICE) COMMITTEE Thursday, 26 September 2024

Minutes of the meeting of the Strategic Planning & Performance (Police) Committee held at Committee Rooms, Guildhall on Thursday, 26 September 2024 at 11.00 am

Present

Members:

Jason Groves (Chair)
Helen Fentimen OBE
Andrew Lentin
Michael Mitchell
Deputy James Thomson
John Griffiths
Melissa Collett

Officers:

| | |
|-------------------|--------------------------|
| Richard Riley CBE | - Town Clerks Department |
| Josef Shadwell | - Town Clerks Department |
| Kezia Barrass | - Town Clerks Department |

City of London Police

| | |
|------------------|-------------------------|
| Paul Betts | - City of London Police |
| Andrew Gould | - City of London Police |
| Amanda Horsburgh | - City of London Police |
| Brett McKenna | - City of London Police |
| Kate Lloyd | - City of London Police |
| Patrick Holdaway | - City of London Police |
| Oliver Shaw | - City of London Police |
| Chris Bell | - City of London Police |
| Megan Cardy | - City of London Police |

1. APOLOGIES

Apologies were received from Deborah Oliver and Tijs Broeke.

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

There were no declarations.

3. MINUTES

RESOLVED, - that the public minutes and non-public summary of the meeting held on 21 May 2024 were approved as an accurate record.

4. PUBLIC OUTSTANDING REFERENCES

Members received a joint report of the Town Clerk and the Commissioner which provided the public outstanding references.

The Chair noted that the PEEL inspection would be discussed further on the agenda, and a more detailed report would be submitted to SPPC in November 2025.

RESOLVED, - that the report be noted.

5. **Q1 POLICING PLAN PERFORMANCE MEASURES**

Members received a report of the Commissioner which outlined the Q1 Policing Plan performance measured.

Members expressed concern that there were reported increases in all areas of crime, and that this would concern women and residents in the City, and queried if this was consistent with national statistics. Officers confirmed that reported increases were in line with national trends.

Members considered the use of signage upon entering the City of London to create a hostile environment for those intent upon committing crimes, particularly phone snatching. Officers agreed to consult on the available options with Corporation colleagues. Members agreed to consider the issue further at the Police Authority Board.

Officers agreed to consult with City of London Comms team on the most appropriate method to inform the public about crime levels in the City of London.

RESOLVED, - that the report be noted.

6. **HMICFRS QUARTERLY UPDATE**

Members received a report of the Commissioner which provided a quarterly HMICFRS update. The Police Authority Director agreed to scope if further data would be available from the Corporation to feed into future demand predictions.

RESOLVED, - that the report be noted.

7. **STRATEGIC COMMUNITY ENGAGEMENT PLAN: KEEPING THOSE WHO LIVE, WORK AND VISIT THE CITY SAFE AND FEELING SAFE**

Members received a joint report of the Commissioner and the Town Clerk which provided an overview of the strategic community engagement plan.

Members suggested that the use of corporate spaces to hold cluster panels, would be an effective method to link with businesses in the City. Members questioned how effective the cluster panel arrangements had been, officers agreed to report back on attendance figures of cluster panels to evidence their reach.

Members noted the significant number of young people and students using the City and considered how to improve engagement with this cohort.

RESOLVED, - that the report be noted.

8. **DEEP DIVE: HOW EFFECTIVELY IS THE CITY OF LONDON POLICE RESPONDING TO SHOPLIFTING?**

Members received a report of the Commissioner which provided a deep dive into how effectively the City of London Police was responding to shoplifting.

Members welcomed the report and felt the good work should be published as a good news story.

RESOLVED, - that the report be noted.

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

There were no questions.

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

The Chair noted that Adrian Hanstock had stepped down from his place as external Member of the Strategic Planning and Performance Committee and thanked him for his contribution.

11. **EXCLUSION OF THE PUBLIC**

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

12. **NON-PUBLIC MINUTES**

RESOLVED, - that the non-public minutes of the meeting held on 12 May were approved as an accurate record.

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

There were no questions.

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

There was no other business.

The meeting ended at 12:59

Chairman

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

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City of London Police Authority Board – Public Outstanding References

| | | | | |
|-----------|---|--|--|---|
| 4/2023/P | Item 16 Protect Duty (Martyn's Law) Update | It was confirmed that 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- A report outlining the latest position on the Terrorism (Protection of Premises) Bill is on the agenda for the December PAB meeting. |
| 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 | Completed – A Strategic Engagement Plan, outlining a new cluster model, was received at the Strategic Planning and Performance Committee in September 2024, and Police Authority Board in October 2024. Regular (quarterly) monitoring of this new model will take place through the Strategic Planning & Performance Committee. |
| 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 |
| | 4 September – item 6 – Commissioners Update | Deputy Chair enquired about cycle awareness courses that could be offered and potentially commissioned by a third party. | Commissioner | In Progress – the City of London Police are discussing with other police forces to ascertain which third party supplier they use to provide cycling safety courses. An update will be provided to the |

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| | | | | Police Authority Board on 4 December 2024 |
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|---|--------------------------------|
| Committee(s): Police Authority Board | Dated: December 2024 |
| Subject: Chair's Update | Public |
| Report of: Tijs Broeke | For Information |

City of London Police Commissioner recruitment

I was pleased that following the open competition run by the City of London Corporation, the Court of Common Council, at its meeting on 10 October, appointed Pete O'Doherty as the next Commissioner of the City of London Police. My warmest congratulations go to him. Pete brings credibility, competence and passion to the leadership post of City Commissioner. I look forward to working closely with him to ensure that the City is the safest business district in the world, supporting the City Police's national roles, and realising our ambition for it to be one of the most inclusive and trusted police services in the country.

At the time of writing, we await the granting of Royal Assent to the appointment, which is in train.

Operational activity

I have been conscious of the extent of operational activity by the City Police at high profile set piece events over recent weeks. These include the Investment Summit at the Guildhall, the (ongoing) public inquiry into the death of Dawn Sturgess, and the 696th Lord Mayor's Show on 9 November. I have been very proud of, and grateful for, the professional way in which the City Police has supported these events. My thanks go to all those involved – both the visible and less visible – whose work has ensured the smooth running of the events and the safety of participants and the public.

Policing Plan 2025 – 2028

I am grateful to those Members who contributed to the session with the City Police on the development of the next Policing Plan in October. This is a really central piece of work, as it will set the strategic direction for policing in the City for the next three years, and set out how the public can assess whether the objectives in the Plan are being achieved. There will be further opportunities for Members to engage with the Plan's development. I very much encourage them to.

I am also grateful to those Members who have supported the recent Cluster Panels set up by the City Police, as part of its public engagement programme. I am interested in an assessment of how the Panels have gone, including what more can be done – by the City Police and Corporation (officers and Members) - to further promote such opportunities. In a similar vein, I look forward to hearing the results of the next City Question Time event in December, which will be supported by senior City Police officers and the Police Authority Board Deputy Chair.

Speaking engagements

Since the last Board meeting, I have spoken at a series of events including the City Police's national economic crime briefing day in October and, on behalf of the Chairman of Policy and Resources, the Financial Crime 360 conference in November. It has been my privilege to also speak at two evening events celebrating the work of the City Police: the City of London Police Reserve Officers' Dinner at Mansion House and, more recently, the City of London Police awards dinner at the Guildhall. Both events were inspiring, and humbling, in equal measure. And reinforced the pride I have in the City Police, and the work of all those who serve in it at all ranks and levels – officers, staff, Specials and volunteers.

Strategic engagement

Strategic engagement continues at pace. The Deputy Chair and I were pleased to welcome Lord Hanson (Home Office Minister for Fraud) on his visit to the City of London Police in October to learn more about its role leading the police response on fraud. Feedback on the visit was very positive and we welcomed the supportive references to the City Police in the Minister's recent letter to the Home Affairs Select Committee following their review of fraud. Next month sees the Security Minister, Dan Jarvis MP, return to the City to hear from teams leading the police response on economic and cyber-crime. Alongside these ministerial visits, I have been meeting with government special advisers to promote the work of the City Police, options for going further on tackling fraud, and to understand government ambitions around the recently announced White Paper on police reform, expected in the New Year. The Financial Times recently carried an op-ed from me about improving the response to fraud, timed to coincide with international fraud awareness week.

Budget implications

We need to be alive to the implications of the Budget announcement on the increase in Employers National Insurance contribution to 15% and reduction in threshold to £5,000 (from April 2025). The expectation is that this will be fully funded but will be confirmed by the Provisional Settlement for 25/26, expected w/c 9th December. The Board will need to consider this further, when details are clearer.

Agenda Item 7

| | |
|--|---|
| Committee(s): Police Authority Board | Dated: 4 December 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 | 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.

Police Authority Board – Commissioner’s Update –

Operations and Security

Security and Policing of the International Investment Summit

Under the leadership of Commander Umer Khan as Gold and Superintendent Helen Isaac as Silver and working in partnership with the Corporation, CoLP successfully delivered a safe environment at short notice for the International Investment Summit. The event received high profile media attention with over 450 delegates attending from all over the world, was excellently managed through effective planning, resourcing and team work, which included liaising with a small protest group to ensure no disruption occurred on the day.

Lord Mayor’s Show 2024

The collaborative working between the Corporation and COLP, under the leadership of Commander Khan as Gold, T/Supt Wynnee as Silver ensured that that event was delivered successfully. The professionalism and dedication of those involved in planning, preparation and working the day contributed to making the Lord Mayor’s show a safe memorable event.

Armistice Day and Remembrance Sunday - The City of London Police pay their respects

To remember our fallen soldiers who gave their lives, The Commissioner Pete O’Doherty laid a wreath and on 11th November the City of London Police paid their respects by observing a two minute silence in the City.

Greenpeace protest at Unilever London HQ sees 35 people charged

As part of the City’s ongoing efforts to protect the city and minimise disruption to businesses and the public, the City of London Police have charged 35 people after Greenpeace protesters locked themselves inside a central London headquarters. Environmental activists staged the protest at Unilever House, a global consumer goods company. Through a prompt response, a specialist team were utilised to remove and arrest 35 protestors for aggravated trespass and public order offences which represents one of the largest operations of this nature in the Square mile. 33 protestors were charged and bailed, with 2 more protestors being charged and remanded to court.

COLP awarded “Silver” by Inclusive Employers

The City of London Police pride ourselves in being an Inclusive employer, which is driven through the recent launch of the new Equality, Diversity and Inclusion strategy (EDI). This excellent work has seen COLP being awarded Silver on the Inclusive Employers Standard (IES) which is an evidence-based accreditation used by over 450 organisations in the UK to help facilitate excellence in this area. To gain this accreditation required a detailed overview of all activities in line with six pillars (Engage, Equip, Empower, Embed, Evaluate, Evolve) of the inclusion framework. This achievement highlights to our people and our partners that inclusion is integral to our organisation and that we fully understand the business case for EDI.

Golden recognition for the City of London Police from the Ministry of Defence (MOD)

The City of London Police continues to work closely with strategic partners, other law enforcement bodies and the Armed Forces to support their communities. We have been awarded the Gold Employer Recognition Scheme by the Ministry of Defence (MoD) for our support and commitment to the Armed Forces community.

HeforShe Article published by United Nations – Violence against Woman and Girls (VAWG)

A priority focus remains the concerted efforts to maintain public trust and confidence in minimising violence against women and girls in the City, driven through the “Op Reframe” initiative. The City of London Police recently presented the Op Reframe initiative at the National HeforShe conference as part of our commitment to challenging and transforming discriminatory attitudes and behaviours to promote gender equality. Their excellent work was also recognised by the United Nations who published details of the Op Reframe operation in the annual “HeforShe Impact Report.”

Junior Cadets launched

The City of London police are dedicated to engaging with young people and maybe identifying and training our police recruits for the future. September saw the launch of the Junior Police Cadets for 15 young students aged 13-15 yrs old at St Pauls Cathedral school who were randomly selected by the school from over 100 applications. They will undertake a 4-grade program, aimed at promoting new skills, good citizenship and activities based

around policing as well as other standard training such as basic first aid. Separately, our cadets recently took home 15 gold medals for team events and twelve for individual events at the inaugural inter-police Cadet Summer Games, which was organised by the City of London Police. Congratulations Cadets on this brilliant result!

Cycle Team

Op Lewis is aimed at reducing anti-social behavior in the city, and tackling the increase of illegally adapted e-cycles on the street. In September/October the Cycle team has completed; 18 arrests, 297 traffic offence reports/fixed penalty notices, 64 intelligence reports, 48 cycles security marked, 48 response calls answered and seized 48 E-bike/scooters. The team have conducted educational events relating to e-bikes, legislation, security cycle marking and giving safety advice in support of the governments ambition to get more people cycling and using this as a primary method of transport in the city.

National Lead Force

Strategic Leadership and Engagement

On Thursday 10th October, the Commissioner hosted the Economic Crime Briefing Day at the Barbican. The day brought together senior leaders from across law enforcement to reflect on the achievements of the previous year, provide key strategic updates and set the vision for the coming year. Guests to the events included senior representatives from the Crown Prosecution Service, the National Crime Agency and the Home Office. Minister of State (Minister for Security), the Rt Hon Dan Jarvis provided a bespoke video message for the event setting out the governments vision.

On Monday 14th October, the Commissioner hosted Lord Sir David Hanson, Minister of State at the Home Office with responsibility for Fraud. Lord Hanson received presentations focusing on the National Lead Force Responsibilities, National Economic Victim Crime Unit and Fraud and Cyber Crime Reporting and Analysis Service. Representatives from the Home Office were also in attendance and further visits are being scheduled.

On Wednesday 16th October, Assistant Commissioner Adams gave a keynote speech at the Cifas fraud prevention service held at the Royal College of Physicians. The conference was the annual members conference attended by industry and the representatives from the public sector involved in fraud prevention. CIFAS launched their fraud pledges during the conference stating its aims for the coming year.

On Friday 18th October, Assistant Commissioner Adams hosted the National Lead Force All Staff Engagement Day held at Livery Hall, Guildhall. This event was attended by 222 officers and staff from the City of London Police. For the first time since its inception, the conference was also live streamed to make it as accessible as possible for colleagues that were unable to attend in person. A further 58 colleagues joined online for the event. The engagement day focused primarily on the successes over the past year, the current challenges and the future vision. A wellbeing lecture was also given, which was well received by colleagues.

Operational

Officers from the Police Intellectual Property Crime Unit (PIPCU) in collaboration the Metropolitan Police executed search warrants at three addresses. A total of 500 counterfeit airbags and an estimated £140,000 in cash were seized across all three premises. Police dogs found £110,000 of this wrapped in nappies and hidden inside a wall cavity at one of the residential properties. The investigation was launched following a referral from the United States Homeland Security Department.

An investigation by the Fraud Operations team has seen a man jailed for eighteen months after fraudulently claiming a £50,000 bounce-back loan to help payback court order fees from a previous £72 million fraud case. The individual used a false identity to apply for the loan, which was then paid to him. He used £22,000 to settle an outstanding court debt.

National Support & Co-ordination

The City of London Police's National Co-ordinators Office has now begun visiting all Regional Organised Crime Units (ROCU) in England and Wales. The purpose of this visits is to enhance engagement and debrief three key

strategic programmes, namely, 1) Anti money Laundering and Asset Recovery, 2) Fraud Reform and 3) Cyber programme. The ROCUs host the Proactive Economic Crime Teams, which are the regional delivery arms of the National Fraud Squad. Since inception, this is the first time a cross-network review will be completed to identify best practice and ensure the co-ordination function by the City of London Police is being effectively delivered.

Media

On Tuesday 1st October, Action Fraud launched its awareness campaign on email and social media hacking. The campaign provided typical methodology utilised by attackers as well as tips on how to stay safe online. There has been extensive media coverage of the campaign both within the UK and from overseas publications.

Peter O'Doherty
T/Commissioner
City of London Police

City of London Corporation Committee Report

| | |
|---|---|
| Committee(s): Audit and Risk Management Committee – For Decision City Bridge Foundation Board– For Decision City of London Police Authority Board– For Decision | Dated: 4 November 2024 27 November 2024 4 December 2024 |
| Subject: City of London Corporation Risk Management Policy | Public report: For Decision |
| This proposal supports the successful delivery of all six Corporate Plan outcomes and our statutory obligations through providing a business enabling function and framework to identify and manage risks to our objectives. | Corporate Risk Management |
| Does this proposal require extra revenue and/or capital spending? | No |
| 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: | Dionne Corradine, Chief Strategy Officer |
| Report author: | Jess Roberts, Corporate Strategy Officer (Engagement) |

Summary

The draft Risk Management Policy outlines the City of London Corporation’s risk management framework and expectations. It has been updated in line with the overarching approach in the City Corporation’s Risk Management Strategy 2024-2029, taking account of other key strategic and risk-related documents (internal and external).¹ It applies to the whole of the City Corporation and helps support the successful delivery of our services and strategic objectives.

Input has been received from across City Corporation when preparing this policy to ensure it provides applicable guidance across our remit and reflects points made by Officers and Members on the risk management process.

This report seeks endorsement of this draft policy from the Audit and Risk Management Committee. As it applies across City Corporation and noting their separate risk reporting governance structures, endorsement is also sought from the City Bridge Foundation Board and City of London Police Authority Board.

¹ e.g. City of London Corporation Corporate Plan 2024-2029; City of London Police Risk Management Framework; City of London Corporation Charity Risk Management Protocol; UK Government - The Orange Book; Charity Commission CC26 Charities and Risk Guidance

Recommendation(s)

Members are asked to:

The **Audit & Risk Management Committee**:

- Endorse the draft Risk Management Policy
- Authorise the Chair and Deputy Chair of Audit and Risk Management Committee to agree any minor changes to the content of the draft document, subject to comments from the City Bridge Foundation Board and City of London Police Authority Board.

The **City Bridge Foundation Board**, in the discharge of functions for the City Corporation as Trustee of City Bridge Foundation and solely in the charity's best interests:

- Endorse the draft Risk Management Policy to apply to City Bridge Foundation.

The **Policy Authority Board**, in the discharge of functions for the City Corporation as Police Authority:

- Endorse the draft Risk Management Policy to apply to the City of London Police.

Main Report

Background

1. The City Corporation's current risk management policy was last endorsed by the Audit and Risk Management Committee in May 2021 as part of the City of London Corporation's Risk Management Policy and Strategy.² When working on the update last year, it was decided that subsequent versions would be better divided into separate strategy and policy documents, reinforced by standalone guidance. This helps us to clearly outline our overarching aims in this area, whilst also providing the right structure and support to City Corporation.
2. A new Risk Management Strategy 2024-2029 was endorsed on 13 May 2024 by the Audit and Risk Management Committee.³ This draft Risk Management Policy supports the delivery of this strategy by providing our risk management framework and expectations in relation to our organisational approach.
3. The policy was developed in consultation with risk leads and practitioners from across the City Corporation's Departments and Institutions. This included targeted engagement with the Chief Officer Risk Management Group, the Risk Management Forum and risk leads within Departments and Institutions that hold a substantial number of risks or have different risk reporting mechanisms, such as City of London Police and City Bridge Foundation. It also reflects the input

² [Agenda item - City of London Corporation Risk Management Policy and Strategy - Modern Council](#)

³ [Agenda item - City of London Corporation Risk Management Strategy 2024-2029 - Modern Council](#),

received from Members on any gaps and/or opportunities to improve our risk management structure and processes.

The Policy

4. A robust risk management culture and framework is key to achieving our strategic objectives, not least in ensuring that decision-makers have the information they need to make strategic and operational decisions. This policy details the risk management responsibilities and processes required to identify and mitigate risks on a day-to-day basis. It highlights best practice, introduces risk identification techniques and outlines our governance and lines of reporting.
5. The following assumptions underpinned the development of the policy:
 - a. The overarching risk management framework and expectations should apply across the City Corporation's Departments and Institutions to ensure commonality of approach and underpin development of the right organisational risk culture.
 - b. There can be flexibility in the way in which the framework is applied within each area to achieve the required outcomes, according to their structure and reporting requirements.
 - c. Chief Officers and Heads of Institutions will be collectively responsible for upholding the policy and ensuring it is applied within their areas.
 - d. All Officers should be aware of the policy and how this helps us to achieve our objectives.
 - e. Regular reporting (to Officers and Members) is essential, both for assurance purposes and to extract strategic benefits.
 - f. Our commitment to openness and transparency in governance should be appropriately reflected in risk management reporting.
6. The Draft Risk Management Policy consists of:
 - a. Risk Management Policy Statement
 - b. Snapshot - What is risk management?
 - c. **Section 1:** Risk Application, Roles and Responsibilities
 - d. Snapshot - Thinking about risk – a beginner's guide
 - e. **Section 2:** Risk Management Process
 - f. Snapshot - What are 'positive opportunity' risks?
 - g. **Section 3:** Risk Management Governance and Reporting
 - h. Annex - Further Reading
7. The draft Risk Management Policy differs from the 2021 policy as follows:
 - a. Separation of the overarching Risk Management Strategy from the Risk Management Policy to improve ease of access and clarity of messaging.
 - b. The content, style and format reflect officer feedback to improve its useability and increased understanding of risk management (supporting an approach led by culture, not process alone).
 - c. The sections are designed to stand alone to assist with ease of reference for specific queries.
 - d. Risk appetite statements are being developed separately and will sit alongside the policy (not within it), subject to frequent review to ensure they remain relevant.

8. The Risk Management Policy together with the overarching Risk Management Strategy, helps address the findings and recommendations flagged by both internal and external audit reports. In addition to socialisation activities to ensure the Policy is embedded within City Corporation (see paragraph 13), we will also be monitoring adherence/compliance through the data on our electronic risk management system (qualitative as well as quantitative), as well as through interaction and engagement with Officers. Progress will be flagged to the Chief Officer Risk Management Group and the Executive Leadership Board/Senior Leadership Team, as required. It will also be included in annual reporting on the Risk Management Strategy 2024-2029 action plan.

Governance

9. The Risk Management Policy was discussed and approved by the Chief Officer Risk Management Group on 3 October 2024.
10. The City of London Police and City Bridge Foundation produce standalone risk reports and their risks are not routinely reported into Audit & Risk Management Committee. The City of London Police Authority Board and the City Bridge Foundation Board are therefore being asked to endorse the policy to reflect our united approach on risk management aims, framework and process, while enabling flexibility in relation to local needs.
11. We have taken account of any differences in governance (e.g. in relation to charity risks) when drafting the policy and ensured that these are reflected in the document, consulting with the relevant areas and Governance and Member Services on this aspect.
12. The policy will be reviewed on an annual basis. Any significant changes will be reported back through the appropriate governance channels.

Next steps

13. Once approved, the Risk Management Policy will be socialised within the City Corporation. This will include publication on intranet pages, dissemination via internal communications channels and targeted engagement with risk leads (via Chief Officer Risk Management Group and the Risk Management Forum).
14. Additional risk management training and guidance will be developed by officers in the Corporate Strategy and Performance Team to support both the Risk Management Policy and the Strategy. Progress on this will be reported to the Audit & Risk Management Committee within regular Risk Management Update reports.

Changes to draft policy post-Audit and Risk Management Committee

15. The Audit and Risk Management Committee approved the draft policy at its meeting on 4 November 2024, subject to some minor amendments. These are reflected in the draft at Appendix 1 and comprise:
- a. Page 4: The reordering of the ‘what is risk management’ section to put the risk explanation up front and add an extra ‘events’ to the para on risk management for clarity (‘assess how important these events may be’).
 - b. Page 9, bullet 2: ‘Want to go a little wider?’ to ‘How to go a little wider’.
 - c. Page 10, final sentence: Risk appetite explanation changed to reflect wording on page 4.

Corporate & Strategic Implications

Strategic implications

The Risk Management Policy supports the delivery of the City of London Corporation’s Corporate Plan 2024-2029 outcomes and our statutory obligations by ensuring we have the right framework to identify and manage our risks.

For City Bridge Foundation, the Risk Management Policy supports the delivery of its overarching strategy, Bridging London 2020–2045.

Financial implications: None

Resource implications; None

Legal implications

The Risk Management Policy seeks to meet its obligations in line with the Accounts and Audit Regulations 2015 to have “effective arrangements for the management of risk”, as well as legal responsibilities in relation to Charity Trustees.

Risk implications

The Risk Management Policy is a key element of the City Corporation’s corporate governance and internal control framework, alongside the Risk Management Strategy 2024-2029 and forthcoming guidance, and will help to ensure appropriate and comprehensive management of all City Corporation risks.

Equalities implications; None

Climate implications: None

Security implications: None

Conclusion

16. This report provides the draft Risk Management Policy and outlines the approach to its development and the socialisation of this once agreed.

17. Committee endorsement will enable the Risk Management Policy to be finalised for adoption across the City Corporation, underpinning the risk management approach, processes and culture.

Appendices

Appendix 1 – Draft Risk Management Policy (post A&RMC version)

Background Papers

- [Endorsement of previous Risk Management Policy and Strategy](#) – Audit and Risk Management Committee 25 May 2021
- [Endorsement of Risk Management Strategy 2024-2029](#) – Audit and Risk Management Committee 13 May 2024.

Jess Roberts

Corporate Strategy Officer (Engagement)

Risk Management Policy



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| Snapshot - Thinking about risk – a beginner's guide | 9 |
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| Annex Further Reading | 21 |

The following documents were consulted during the development of this policy

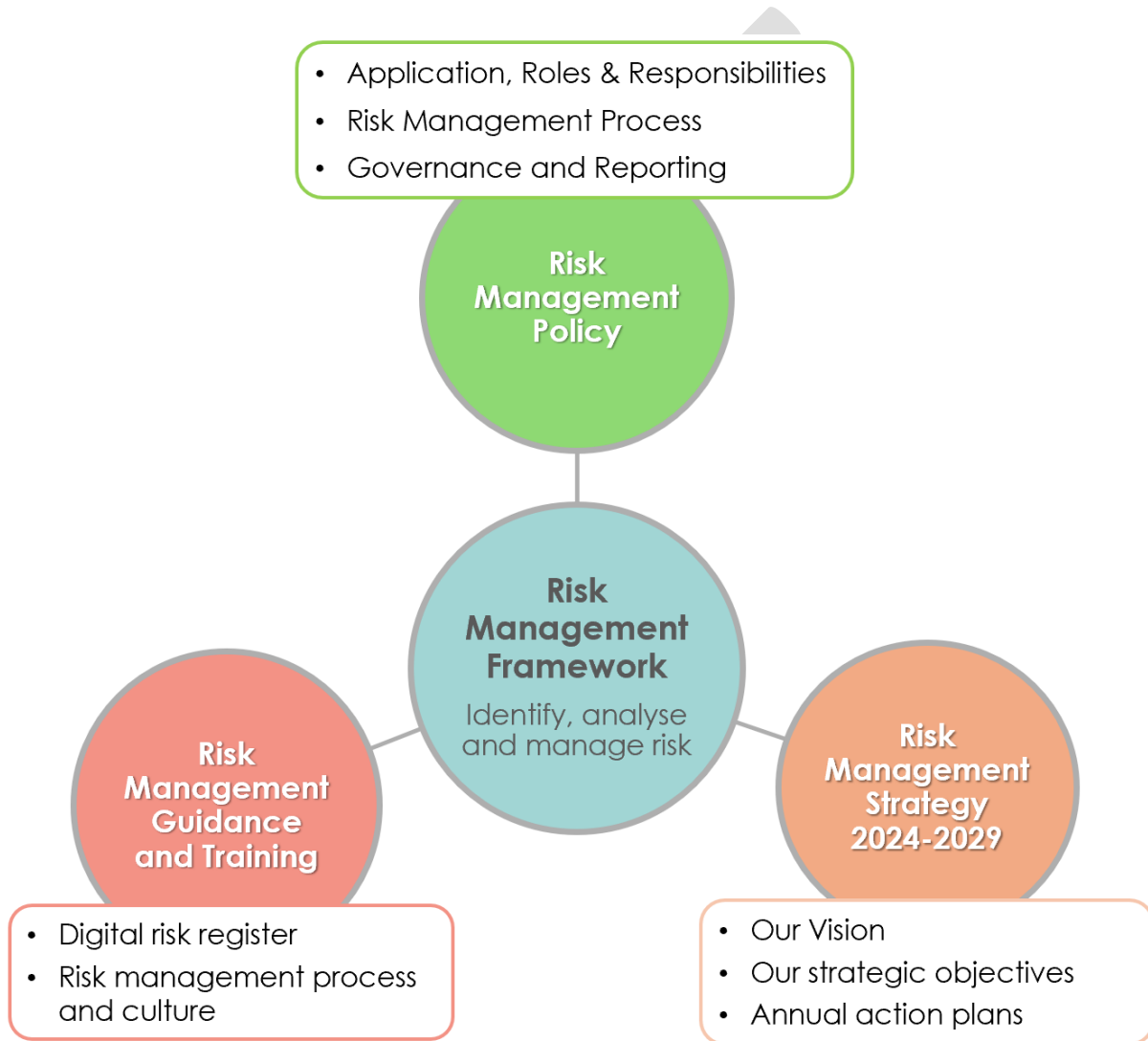
| | |
|--|---|
| UK Government - The Orange Book | Charity Commission CC26 Charities and Risk Guidance |
| Airmic Risk and Managing Risk Explained | City of London Corporation Risk Management Strategy 2024-2029 |
| COSO Enterprise Risk Management, June 2017 | City of London Police Risk Management Framework |
| British Standards Institution, ISO 31000; 2018 | City of London Corporation Corporate Plan 2024-2029 |

Policy Owners: Chief Strategy Officer (Senior Responsible Officer for Corporate Risk and Head of Profession for Risk Management); Corporate Strategy and Risk Team in Corporate Strategy and Performance Team: CSPT@cityoflondon.gov.uk

Version 1.0, Dated [XX] 2024 [draft includes minor changes post-A&RMC]

Our Vision

A world class leader in dynamic risk management, best practice embedded and used in strategic decision-making, future proofing successful delivery of outcomes]



Risk Management Policy Statement

The City of London Corporation is committed to proactive and dynamic risk management as a fundamental part of good governance and effective business operations. This is reflected in our overarching approach to identifying and managing risk, as laid out in our [Risk Management Strategy 2024-2029](#).

Effective risk management is critical to the successful delivery of our services and Corporate Plan 2024-2029 strategic outcomes.¹ Our Risk Management Policy helps set the risk management framework and culture to achieve this. It also ensures that we comply with our statutory duties in relation to managing risks as seen in Regulation 4 of *Accounts and Audit Regulations 2015* for local government in England and Wales² and, where relevant, the City Corporation's responsibilities as trustees to effectively manage our charity risks in accordance with the Charity Commission's *Charities and Risk Guidance, CC26*.³

Our Risk Management Policy applies to all City of London Corporation

Departments and Institutions and covers:

1. Risk Application, Roles and Responsibilities
2. Risk Management Process
3. Risk Management Governance and Reporting

These sections outline the City Corporation's overarching approach and requirements in risk management. It is for Departments and Institutions to ensure that these are reflected and adhered to in their practices and any local policies, including:

- **Regularly discussing and reviewing risks within business areas** so that risks accurately reflect current challenges (and opportunities), are regularly assessed and proactively used to achieve successful business outcomes. This should include discussion with relevant stakeholders (internal and/or external) on risks and mitigations.
- **Reporting risks into the relevant Boards and Committees** ensuring Officer and Member oversight of risk management and supporting our commitment to openness and transparency in our risk management process.

¹ See [Our Corporate Plan 2024-29 - City of London](#)

² [The Accounts and Audit Regulations 2015 \(legislation.gov.uk\)](#)

³ [Charities and risk management \(CC26\) - GOV.UK \(www.gov.uk\)](#)

What is risk management?

What is risk?

A risk is an *uncertain future-oriented event* that hasn't happened yet but has the potential to occur and, if it did, would have an impact on achieving our objectives. Risks can be a negative threat or a positive opportunity.

- **Negative threats** are blockers to both the short and long-term achievement of our objectives.
- **Positive opportunities** are events or occurrences that could be beneficial to the successful delivery of our aims.

What is the difference between a risk and an issue?

If a risk is an *uncertain future-oriented event* that hasn't happened yet, then an issue is an event *that has already happened/is happening* and impacting outcomes. One way to determine the difference between a risk and an issue is to consider how you will manage it.

- Are you putting in place proactive and/or preventative measures? **Risk**
- Are you applying reactive responses to try to manage the effect? **Issue**

Risk registers should be used for recording our risks, and not our issues.

What is risk management?

Risk management is the way in which we identify events in the future that may impact the delivery of our objectives, assess how important these events may be and put measures in place to manage their impact and likelihood.

Essentially it is the process by which risks are identified, evaluated and controlled (mitigated) or accepted.

What is risk appetite and risk tolerance?

Risk appetite is the amount of risk that an organisation is willing to seek or accept in the pursuit of its long-term objectives. **Risk tolerance** is the amount of risk an organisation could actually take, usually from a financial perspective, before it is significantly impacted. Understanding risk appetite and risk tolerance supports informed decision-making and helps us to focus on priority areas. See the City Corporation's intranet site for more information.

Section 1: Risk Application, Roles and Responsibilities

This policy and the associated guidance should be used to inform thinking about risk and management of risk across all Departments and Institutions and at all levels. Within City Corporation on a daily basis, we use risk to inform decision making and help us achieve our objectives. This is as true for routine business activities as it is for more strategic risk planning. The ability to understand and manage risk is something that impacts multiple aspects of our everyday work, such as (but not limited to):

- Business Planning
- Financial Forecasting
- Projects and Programmes
- Service Delivery (including through our various facilities)
- Event Planning and Management

Everyone at City Corporation has a role to play in effective risk management, although some people will have additional direct risk management responsibilities.

All Officers should:

- Understand how risk plays a role in helping the City Corporation achieve its objectives at multiple levels throughout the organisation and in their own day-to-day activities.
- Play their part in risk management by reporting potential risks, blockers and/or opportunities to managers and/or senior leaders.

Officers in risk management-related roles should:

- Familiarise and understand the risk management framework and process using this Risk Management Policy, supporting guidance and our Risk Management Strategy 2024-2029.
- Actively participate in the Risk Management Forum⁴ to help manage risk with City Corporation and receive regular updates on risk management culture and practices.

⁴ Further details on [Risk Management pages on the intranet](#). Please contact CSPT@cityoflondon.gov.uk to join the Risk Management Forum.

- Use available risk management learning and training to keep up to date with risk management practices, information and any local policies that apply directly to their area of work.⁵
- Champion the risk management process by taking a proactive approach, ensuring that risks are identified, evaluated, and controlled effectively.

Chief Officers and Heads of Institutions must:

- Ensure their risk management function runs effectively and is adequately resourced.
- This includes the work internally to identify and manage risk as well as the ownership of specific risks, with staff and Senior Leadership Teams taking a proactive role in risk processes and governance (see risk roles in the section below).

Our **Members play a key part in effective and efficient risk management**, inputting to this via the Committee process. More information on their role can be found in Section 3: Risk Management Governance and Reporting.

Risk Roles and Responsibilities

As Officers, we are accountable for City Corporation risk management, including what risks go onto the risk registers. Whatever the local set-up, the roles supporting this risk function must cover the following:

- Considering and inputting new risks to the risk register
- Agreeing risks and mitigations, and taking actions forward
- Ensuring risks are regularly reviewed by Senior Leadership Teams and used to help drive forward local and/or strategic business objectives
- Proactively updating the risk register in response to current circumstances
- Preparing reports for Boards, Committees and other meetings
- Utilising risk knowledge, undertaking the relevant training and understanding risk guidance

There is a difference between 'owners' of the specific risks recorded on the risk registers and the day-to-day contacts for risk management.

⁵ Further information can be found by looking at the [Risk Management pages on the intranet](#) or by contacting the Corporate Strategy and Performance Team.

Risk Administrators/Risk Coordinators support the day-to-day running of the risk management process within a business area.

They need to:

- Understand risk management and the risk process and provide guidance and advice to management teams and senior Officers
- Support the risk management process by instigating regular risk reviews
- Provide risk updates which are well written with sufficient information, on our risk management information system and if required in person
- (Risk Coordinators) Act as a central point of contact for risk
- (Risk Coordinators) Oversee and contribute to risk discussions within their areas – at team or wider levels
- (Risk Coordinators) Regularly produce and report risk analysis to Senior Leadership Teams or for Boards/Committees

Risk Managers and Risk Owners will have been assigned a risk on the risk register – either overall or in part (e.g. mitigating controls and actions). A risk manager is the subject matter expert who will deal with the risk and related actions on a day-to-day basis, while a risk owner carries final accountability for that risk and potentially others in their area.

Both roles will take responsibility for the effective handling of risk by:

- Proactively ensuring risks and/or risk actions are effectively and appropriately addressed
- Regularly reviewing their risk(s) and associated actions to reflect current circumstances (internal and external)
- Ensuring Risk Administrators/Coordinators are provided with all necessary information, and on a timely basis, for them to be effective in their roles
- (Risk Manager) Acting as a point of contact for their risk
- (Risk Manager) Making recommendations to the risk owner regarding the management of the risk/actions (e.g. escalation or score change)
- (Risk Owner) Ensuring continuity of risk management across areas

N.B. Chief Officers are the overarching owners of any strategic level risk, such as corporate risks, within their business areas and have overarching accountability for the management of all their risks.

In addition to the above, there are some supporting/cross-cutting roles that can help with risk management across the City Corporation, e.g., input on risk

impact, likelihood and mitigation discussions. This includes Heads of Profession or those with expertise in a particular area (e.g. safeguarding, climate action etc).

The Corporate Strategy and Risk Team within the Corporate Strategy and Performance Team (CSPT) looks across and supports the risks management function in City Corporation, as follows:

- Acting as a point of contact for risk training, guidance and support
- Preparing risk management updates for the Senior Leadership Team and Executive Leadership Board⁶
- Secretariat to the Chief Officer Risk Management Group (CORMG), chaired by the Chief Strategy Officer
- Submitting regular corporate risk management reporting to Audit and Risk Management Committee

Further information on the team and risk management in general can be found on the City of London intranet

⁶ [Senior Officer Governance \(sharepoint.com\)](#)

Thinking about risk – a beginner's guide

1. **Understand your team, department, institutions, charity's and/or our cross-cutting strategic objectives** – you need to know what you want to achieve before you can consider any threats, blockers or opportunities.
2. **How to go a little wider.**
 - a. **Horizon scanning:** Examining potential future scenarios helps to better comprehend uncertainties and assess if the organisation is well-prepared for possible opportunities and risks.
 - b. **PESTLE analysis:** Exploring six key categories (Political, Economic, Social, Technological, Legal and Environmental) to examine opportunities and threats that you may hold.
3. **Getting a risk conversation started.**
 - a. **Workshops and mind mapping:** Bring teams together to build off each other's ideas, look at the bigger picture and help each other better understand their risk landscape.
 - b. **Use audit reports:** Whether as a review carried out by your own team or as part of a formalised process by the Internal Audit function, audits can help identify gaps and how to solve them.
 - c. **Flowcharts and dependency analysis:** These can be particularly helpful for areas with supply chains to see where there are critical components exposed to threats and/or opportunities for expansion.
4. **Think about who needs to be involved in the risk process.**
 - a. Who will be responsible for ensuring risks are appropriately updated and reported?
 - b. Who are the content experts that will be reviewing and monitoring the risk landscape?
 - c. Do you have the right people in the right roles to ensure risk management is consistent and appropriately applied?
5. **Make sure you consider Equity, Equality, Diversity, and Inclusion (EEDI)** when assessing risk and planning subsequent actions. This ensures a comprehensive evaluation of risks and that we comply with our [Public Sector Equality Duty](#), leading to appropriate mitigations and next steps.

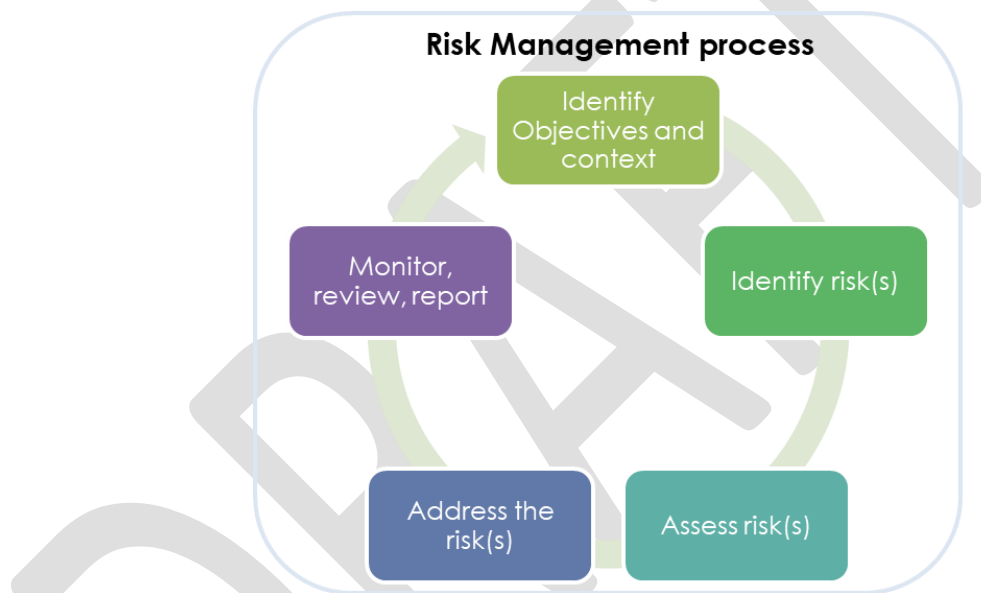
More information can be found on the City of London Corporation intranet site [Risk Management Pages](#).

Section 2: Risk Management Process

Our City of London Corporation risk management processes help us identify, analyse and manage risks. We keep our risks in risk registers on our electronic risk management information system (Ideagen), recording their nature (e.g. cause), potential impact and mitigation actions.

It is crucial that registers are up to date for risk reporting and auditing, and informed decision-making.

Using the following steps, we can ensure our risks are correctly identified, agreed, drafted and managed using the risk registers:



1. Identify objectives and context

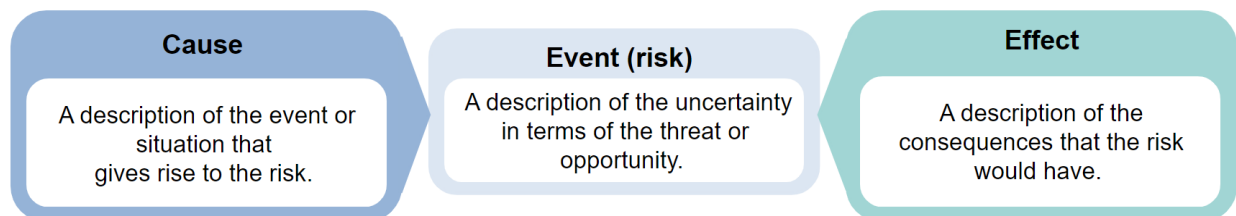
Examine the internal and external context of the organisation and think about how this may impact your business outcomes. Consider all your activities at various levels – budget setting, business plans, any relevant strategies (you use or that are in development), or projects and programmes in your team and/or department and what objectives these aim to achieve. Also think about how these relate to wider strategic outcomes be these departmental, corporate or relating to cross-cutting.

As part of this you should also consider risk appetite (the amount of risk that an organisation is willing to seek or accept in the pursuit of its long-term objectives).

Understanding this will help inform your decisions around risk and the actions you will take to either pursue or limit your exposure to it.

2. Identify risk(s)

Use your objectives to find and clearly articulate your risks, thinking about what will block or threaten the achievement of these objectives. Also think about where there are opportunities to pursue risk to better help achieve these objectives. When describing our risks we use the Cause, Event (risk), Effect modal - also known as the bowtie model:



Using this model helps to ensure we are capturing risks and not issues. This is vital to ensuring a robust and effective risk management process. If risk registers are filled with issues, the ability to use them to help achieve strategic aims is hampered by the need for an immediate response. Having the right risks on the register helps unlock strategic success.

Remember risk registers may be made public through Committee reporting. This must be considered when drafting the risk.

3. Assess risk(s)

a. Classify the risk level

The risk level determines who oversees and monitors the risks. Consider which objectives this risk will affect and who will need to be involved with managing the risk. There are different levels of organisational risk covering strategic, departmental, operational, and projects. Making sure the risk is assessed at the appropriate level will ensure it is managed proportionately and appropriately.

b. Score the risk – original, current and target

Scoring a risk involves evaluating two main factors: **likelihood** and **impact**.⁷

⁷ Further guidance on risk scoring can be found here: [Risk Management \(sharepoint.com\)](#).

- **Likelihood:** Consider *reasonable* likelihood of this risk occurring in the current situation. This likelihood is then assigned a numerical score on a scale from **1** (rare), **2** (unlikely), **3** (possible) and **4** (likely).
- **Impact:** Assess the *reasonable* potential impact if the risk does occur. This is also rated on a scale from **1** (minor), **2** (serious), **4** (major) and **8** (extreme). The impact score is scaled higher than likelihood as it is often will result in worse outcomes, as such we prioritise high impact risks for management.

Risk score: The total risk score is calculated by multiplying the likelihood score by the impact score. The risk score helps to prioritise risks for treatment in terms of their significance and inform resource allocation and decision making.

We assess the risk score at three different points:

- **Inherent/original:** The risk score on the day the risk is identified. This is the level of risk before any controls have been put in place or actions taken to manage the risk and change the likelihood or impact.
- **Current:** This is the level of risk at the time of review, taking into account the actions in place to manage it.
- **Target:** This is the score where the risk would be considered as at an acceptable level in accordance with our risk appetite. This reflects what the risk should look like once mitigating actions have been carried out and the risk is being successfully managed.

Risk Score Matrix

| | | Impact | | | |
|------------|------------|---------|-----------|---------|-----------|
| | | Minor 1 | Serious 2 | Major 4 | Extreme 8 |
| Likelihood | Likely 4 | 4 | 8 | 16 | 32 |
| | Possible 3 | 3 | 6 | 12 | 24 |
| | Unlikely 2 | 2 | 4 | 8 | 16 |
| | Rare 1 | 1 | 2 | 4 | 8 |

Where there is more than one potential impact, the highest impact score should be used to plot the risk onto the risk matrix. **Do not average out the scores - this misrepresents the real effect of risk.**

It is important for risk assessments to be **reasonable and proportionate**. When risk scores and levels are overstated (e.g. to bump something up an agenda or get additional funding), it can hinder effective risk management and makes our risk registers less reliable for strategic decision making.

4. Address the risk(s)

a. Determine risk treatment:

Reflecting on the risk identification and assessment completed and acknowledging the risk appetite we might hold, we will either **tolerate, transfer, terminate** or **treat** our risk (4T method).

- **Tolerate:** Accept likelihood and impact of risk as it stands, acknowledging we cannot change this.⁸
- **Transfer:** Responsibility for risk is transferred to another party (e.g. insurance).⁹
- **Terminate:** The risk posed is too high for the organisation so related activities do not take place - e.g. ending a business relationship if it causes more harm than good (such as legal or reputational issues) or amending objectives if they cannot be achieved without sizable risk.
- **Treat:** Use mitigating actions and internal controls to manage the risk according to likelihood and impact assessment (risk score). This is the most common choice.

b. Outline controls and related actions (mitigations)

If treating the risk, put in place **controls and related actions** (mitigations) that will reduce the likelihood of the risk occurring and the severity of its impact to bring it into line with the target risk score.

⁸ Risks requiring ongoing controls to maintain their current level should be added to the risk register to ensure appropriate review.

⁹ At times there may be ongoing controls necessary to ensure appropriate handling, including in some cases, remaining actions for City Corporation after transfer. These should be added to the risk register as risks in their own right for routine review.

Controls are typically either:

- **Preventive** – an internal control that seeks to avoid the risk occurring (e.g., data security training and removing hazards).
- **Corrective** – designed to be put in place if the risk occurs to lessen its impact (e.g., fire alarms and regular auditing of projects).

The controls and actions should be proportionate and cost-effective. The implementation of these should not exceed the cost and impact of the risk itself. Mitigations may affect likelihood, impact or both – it is important that both are considered when deciding on the next steps in risk management.

c. Clarify risk and controls ownership

As highlighted in Section 1, risk owners and managers are vital for ensuring accountability and proactive risk management. Each risk and associated control (mitigating action) needs to have an assigned owner and manager that is appropriate for the level and scoring of the risk.

5. Monitor, review, report

Effective risk management is more than identifying risks and putting them on the register. It requires the ongoing observation and assessment of risks, controls, root causes, consequences, and any changes in our context and goals.

This regular review process should occur both in response to changes and, in the absence of changes, to confirm that the current assessments remain valid and appropriate. Risks are also not stagnant in their original assessments and classification. As our objectives and context change risks may need to be escalated or de-escalated from their current level to ensure they continue to receive suitable and proportionate management.

What are 'positive opportunity' risks?

Opportunity risks are usually deliberately sought or embraced by the organisation. These risks arise from the organisation's efforts to better achieve our objectives, though they may have negative consequences if the risks associated with the opportunity materialise. **This type of strategic risk-taking is important to the long-term success of any organisation.**

Opportunity risks can be identified in the same way as regular risks - by understanding our context and objectives. Where an opportunity for innovation or increased success has been identified it should be assessed using the 5E method of **Exploit, Expand, Exit, Exist** and **Explore** (as opposed to threat risks, which use the tolerate, transfer, terminate, treat 4T method).

The 5E method weighs potential risks against potential rewards to determine whether an opportunity should be undertaken.



- **Explore, Expand, Exploit** and **Exist** are the treatment options, outlined in the diagram above, this diagram can also be seen as a flowchart as the opportunity is pursued and progressed from one stage to the next.
- **Exit** should be activated if, during the process of pursuing the opportunity, the risk levels increases and it is therefore no longer viable.
- Effective risk management decreases potential threats by applying actions and controls increasing the chances of success.

Section 3: Risk Management Governance and Reporting

To ensure our risk management process is robust, the risks on our risk registers must be regularly reviewed by and reported to a variety of internal stakeholders – both Officers and Members. These fulfil different but complimentary roles in our risk reporting:

- **Officers** (and our Town Clerk and Chief Executive) are responsible - and ultimately accountable - for identifying and managing risk within City Corporation. This includes what risks should be put onto the risk register, updating these in timely and responsive manner and managing any mitigating actions.
- **Members** monitor and oversee City Corporation's risk management strategy and arrangements. They play an essential role in scrutinising our risk management and its effectiveness. This is distinct from operational decision-making on risks/officer actions to identify and manage risk but works in tandem with this to ensure sound and appropriate risk management.



Officer Governance

Business Areas: Chief Officers and Heads of Institutions are accountable for their departmental/institution's risks and the handling of these, including what is put onto their risk registers. They may delegate responsibility for the oversight and management of this to others in their area - for example the discussion, handing and input onto the risk registers at divisional, service or charity risk level. However, their top-level business area risks (including any strategic risks they own such as Corporate Risks) and any notable changes to lower-level risk registers (team, service, divisional etc) should be a recurring agenda item at Senior Leadership Team meetings. This should include whether a risk is escalated, de-escalated or should be on the risk register at all.

Strategic Oversight: The Chief Officer Risk Management Group (CORMG) – a sub-committee of the Executive Leadership Board – contains reps from across the City Corporation¹⁰ and meets at least once every two months to review the management of corporate and top red departmental risks. CORMG discuss developing risk areas and consider wider aspects of risk management such as our overarching risk management culture and compliance with risk management processes and procedures. They decide on changes to the City Corporation's Corporate Risks, including what goes onto the Corporate Risk Register (e.g. when a risk should be escalated and/or de-escalated or a new risk put on). CORMG regularly report risk management into the Town Clerk's Senior Leadership Team and the Executive Leadership Board.

Member Governance

For Members to fulfil their risk management oversight and scrutiny function, risks should be regularly reported into committees. Our risk management is reviewed and scrutinised in numerous committees (covering service, departmental and charity risks to the cross-cutting strategic risks like Corporate Risks). The way in which this is presented (e.g. summaries, fuller reports) and the frequency of reporting may differ by Committee. Attention should be paid to the relevant Committee Terms of Reference (TORs) when deciding the approach, but a

¹⁰ Chief Officer Risk Management Group attendees (Oct 2024): Chief Strategy Officer (CoLC SRO for Corporate Risk) – Chair; Chamberlain; City Surveyor; Deputy Town Clerk; Executive Director Community and Children's Services; Executive Director of Environment; Comptroller & City Solicitor and Deputy Chief Executive; Executive Director HR & Chief People Officer; Chief Operating Officer, City Bridge Foundation; Chief Operating Officer City of London Police; Chief Executive Officer, Barbican Centre.

report about once every quarter would be ideal, where possible. TORs are held by Member Services.

To set this in context, under current arrangements, the Audit and Risk Management Committee receive a risk management update at least once a quarter. This includes the full Corporate Risk Register once a year. At other times they receive corporate risks above appetite and any new corporate risks. They are also given a summary list of the City Corporation's red departmental risks.¹¹

Charity-related risk

Some risks held by City Corporation are linked to our role as a corporate Charity Trustee - such as for City Bridge Foundation, City of London Almshouses or otherwise e.g. open spaces charities administered within Natural Environment.¹² The Court of Common Council acts on behalf of the City Corporation as Trustee and is ultimately responsible for discharging the City Corporation's Trustee functions. However, whilst the Court retains oversight and ultimate responsibility, it substantively delegates these Trustee functions to Committees of the Court.¹³

Members of these Committees are not charity trustees themselves but are collectively responsible for the day-to-day administration and management of the charity within their remit (TORs) – including oversight of those matters they have further delegated to its sub-committees or to officers, which would include risk management.

Chief Officers remain responsible for risk management in delivering their Department/Institution's functions for the City Corporation, in accordance with the terms of their delegated authority as set out in the Officer Scheme of Delegations, or, where granted on a case-by-case basis, by the responsible Committee (see above paragraph). Under the City Corporation's corporate governance framework (including the Risk Management Framework), Chief

¹¹ This does not include the City of London Police or City Bridge Foundation red risks or 'strategic' or 'priority' risks which are reported to their own Committees along a separate governance line.

¹² The City Corporation acting by the Court of Alderman is also the corporate Trustee of the Emanuel Hospital charity, the legal and risk framework operating similarly.

¹³ As sole corporate trustee of City Bridge Foundation/other charities, the City Corporation is subject to the legal duties which apply to charity trustees. This includes a duty to promote the charitable purposes for the public benefit, comply with the charity's governing documents and the law, act in the best interests of the charity and manage any conflicts, ensure the charity is accountable, manage the charity's resources responsibly, and to act with reasonable care and skill.

Officers are accountable to their responsible service and corporate Committees, and ultimately to the Court.

Further information on how to manage risks relating to charities can be found by contacting Member Services or speaking to the relevant Department or Institution.¹⁴

Reporting Risks to Committees

Risk oversight routinely forms part of the public sessions of committee meetings, in support of open and transparent governance. Risk titles, descriptions and updates should be written with this in mind. Sometimes there may be a need to report details of risks in non-public or even confidential session. This must conform to advice from Member Services in line with our statutory and other commitments, but for some initial guidance:

Non-Public: Under the stipulations of the Local Government Act 12A Part 1, the grounds for restricting items are as follows:

- 1) Information relating to any individual.
- 2) Information which is likely to reveal the identity of an individual.
- 3) Information relating to the financial or business affairs of any particular person or body (including the authority holding that information).
- 4) Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.
- 5) Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.
- 6) Information which reveals that the authority proposes to give a statutory notice under or by virtue of which requirements are imposed on a person; or to make an order or direction under any enactment.
- 7) Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

¹⁴ You can also find details in the external document, [Charity Commission CC26 Charities and Risk Guidance](#).

Risk information that does not fall into these brackets would be reported in public session. Although this Act specifically applies to our duties as a Local Authority, in the spirit of open governance as part of the democratic process, we apply this more widely to the work of City Corporation. Member Services should be consulted if you are in doubt about the way in which your risks should be reported – with the relevant Chief Officer/Heads of Institutions input also.

Confidential: At certain times, risks and the management of our risks (mitigating controls and actions etc) may include information that needs additional protection due to specific sensitivities (e.g. personal data, commercial in confidence, sensitive security vulnerabilities). There is the option to discuss these in a 'confidential session' – which usually includes all Committee Members, but with reduced Officer attendance on a 'need to know' basis. Again, Member Services can advise on the appropriate way to proceed.¹⁵

¹⁵ [Member Services information](#), including contact details for the committee clerks, can be found on the intranet.

Annex: Further Reading

Links below to resources that can aid further understanding (October 2024)

Internal

We have outlined the importance of thinking about risks outside of departmental silos. These internal points of contact and/or policies can help set risk thinking in a wider context:

- **City of London Corporation Heads of Profession:** [Risk Management \(sharepoint.com\)](#)
- **Health, Safety and Wellbeing Team** - [Policies, Guidance and Template \(sharepoint.com\)](#)
- **Internal Audit colleagues** - [Internal Audit](#)
- **Member Services for Governance Arrangements** - [Committee and Member services information on the intranet](#)

In addition, there are some [supplementary risk documents](#) for those working on charities and in City of London Police. These are:

- [City Bridge Foundation Risk Protocol](#)
- [City of London Corporation Risk Management Protocol for Charities¹⁶](#)
- [City of London Police Risk Management Framework](#)

External

For those wanting to learn more about risk management in general and/or help to think about wider risk themes (e.g., in horizon scanning):

- [Orange Book - GOV.UK \(www.gov.uk\)](#) – UK Government publication on risk management
- [London Risk Register](#) - lays out potential risks facing London
- [National Risk Register](#) – an external version of the National Security Risk Assessment (NSRA), which is an assessment of the most serious risks facing the UK (as at 2023).
- [Charity Commission CC26 Charities and Risk Guidance](#) – provides further context to our obligations as a charity trustee in the risk management space.

¹⁶ Does not include all of City of London Corporation charities – see Appendix 1 for list of charities that fall within its remit.

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Agenda Item 9

| | |
|---|----------------------------------|
| Committee(s): Police Authority Board | Dated: 4 December 2024 |
| Subject: City of London Police Authority Board Terms of Reference | Public |
| Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly? | Providing Excellent Services |
| Does this proposal require extra revenue and/or capital spending? | No |
| If so, how much? | £ |
| What is the source of Funding? | |
| Has this Funding Source been agreed with the Chamberlain's Department? | N/A |
| Report of: Town Clerk | For Decision |
| Report author: Kezia Barrass, Governance and Member Services | |

Summary

It was agreed at the City of London Police Pensions Board on 17 July 2024 to approve the Terms of Reference to reflect the expectation on Members of the Board to undertake The Pensions Regulator training and to assume responsibility for ensuring their training is current and up to date.

Recommendation(s)

Members are recommended to approve the suggested addition to the Terms of Reference.

Main Report

Background

The Police Authority team undertook to review the Police Authority Board terms of reference as part of regular governance review, to ensure they are appropriate in enabling the Police Authority Board to perform its functions.

Appendices

- Appendix 1 – City of London Police Authority Board Terms of Reference

Kezia Barrass

Governance and Member Services, Town Clerk's Department.

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| | |
|-----------------|---|
| MAINELLI, Mayor | RESOLVED: That the Court of Common Council holden in the Guildhall of the City of London on Thursday 25 th April 2024, doth hereby appoint the following Committee until the first meeting of the Court in April, 2025. |
|-----------------|---|

CITY OF LONDON POLICE AUTHORITY BOARD

1. **Constitution**

A non-ward committee consisting of:

- 11 Members elected by the Court of Common Council including:
 - a minimum of one Member who has fewer than five years' service on the Court at the time of their appointment; and,
 - a minimum of two Members whose primary residence is in the City of London;
- 2 non-voting external members (i.e. non-Members of the Court of Common Council) appointed in accordance with the terms of the Police Authority Board Membership Scheme
- 2 non-voting external members (i.e. non-Members of the Court of Common Council) appointed in accordance with the terms of the Police Authority Board Membership Scheme, with the disapplication of disqualification criteria 9(b) and 9(c), the requirement to reside or work within the City of London.

The Chairman and Deputy Chairman to be elected from among Court of Common Council Members of the Board.

Effective April 2021, there shall be a maximum continuous service limit of three terms of four years, with immediate past Chairs qualifying for a further four-year term. Service as Chair/Deputy Chair shall not count towards an individual's term limit.

2. **Quorum**

The quorum consists of any five voting Members.

3. **Membership 2023/24**

The Members referred to in paragraph 1 together with three Members to be appointed this day

- 10 (4) Nicholas Michael Bensted-Smith JP
- 9 (4) Helen Lesley Fentimen OBE
- 4 (4) Graham David Packham
- 7 (3) Emma Edhem, Alderman
- 7 (3) Tijs Broeke
- 10 (2) James Michael Douglas Thomson, Deputy
- 3 (2) Deborah Oliver TD
- 5 (2) Dawn Linsey Wright, Deputy
- 5 (1) Alderman Timothy Hailes
- 2 (1) Jason Groves
- 1 (1) Deputy Madush Gupta

Together with three Members to be appointed this day and two non-City of London Corporation Members:

- Andrew Lentin (*appointed for a four-year term to expire in September 2025*)
- Sir Craig Mackey (*appointed for a four-year term to expire in September 2025*)
- Michael Mitchell (*appointed for a four-year term to expire in September 2026*)
- Mellissa Collett (*appointed for a four-year term to expire in September 2026*)

4. **Terms of Reference**

To be responsible for:-

- (a) securing an efficient and effective police service in both the City of London and, where so designated by the Home Office, nationally, and holding the Commissioner to account for the exercise of his/her functions and those persons under his/her direction and control;
- (b) Issuing, each year, the Common Council's objectives for the policing of the City of London police area, and for the discharge by the City of London Police of its national or international functions, which shall have regard to the views of local people, the views of the Commissioner and the Strategic Policing Requirement;
- (c) any powers and duties vested in the Court of Common Council as police authority for the City of London by virtue of the City of London Police Act 1839, the Police and Criminal Evidence Act 1984, the Police Acts 1996 (as amended) and 1997, the Criminal Justice and Police Act 2001, the Police Reform Act 2002, the Police Reform and Social Responsibility Act 2011 and any other Act or Acts, Statutory Instruments, Orders in Council, Rules or byelaws etc. from time to time in force, save the appointment of the Commissioner of Police which by virtue of Section 3 of the City of London Police Act 1839 remains the responsibility of the Common Council;

- (d) making recommendations to the Court of Common Council regarding the appointment of the Commissioner of the City of London Police;
- (e) to set the annual budget and capital programme of the Force;
- (f) monitoring and scrutinising the Force's performance across a range of equality, diversity and inclusion measures, setting strategic objectives for the Force where appropriate;
- (g) the handling of complaints and the maintenance of standards across the Force;
- (h) monitoring and scrutinising of performance against the City of London Policing Plan, including the Force's strategic priorities as National Lead Force for Fraud;
- (i) monitoring and scrutinising of performance of the force in its capacity as National Lead Force for Fraud in partnership with the Home Office;
- (j) Monitoring and scrutinising the Force's work to prevent and reduce crime in partnership with relevant agencies in the City of London;
- (k) ensuring local community needs are identified, considered and met as effectively as possible, including through the Policing Plan;
- (l) appointing such committees as are considered necessary for the better performance of its duties; and
- (m) To appoint the Chairman of the Police Pensions Board.

City of London Corporation Committee Report

| | |
|---|---|
| Committee(s): Police Authority Board - For information | Dated: 4 December 2024 |
| Subject: Annual Custody Update | Public report: For Information |
| This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes | Diverse engaged communities, providing excellent services. |
| Does this proposal require extra revenue and/or capital spending? | No |
| 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 City of London Police |
| Report author: | T/Detective Superintendent Anna Rice, Criminal Justice Services |

Summary

The purpose of the report is to provide members with an annual report in relation to custody functions and activities within the City of London over the past 12 months.

The report provides data relating to annual demand, vulnerability data and information on Use of Force, juveniles and strip searching. It also provides associated diversion and inclusion data and provides an update on the position outlined in the June 2024 report relating to scrutiny of custody matters.

The report includes an overview and update on some of the measures implemented since the previous HMICFRS inspection in 2019 and improvements made to the custody estate.

Recommendation(s)

Members are asked to note the report.

Main Report

Background

1. The force previously provided members with an annual report on custody matters focussing on children and vulnerability, last provided in 2019. At the Police Authority Board meeting in June 2024, it was proposed and agreed that the force would provide an annual report on custody matters. This would specifically include relevant data relating to equality, diversion and inclusion to ensure members had appropriate oversight and is to coincide with the annual Independent Custody Visitor (ICV) report.
2. The report covers the period October 2023 to September 2024 and includes relevant data where available. It also provides updates relating to the custody estate and Operation Safeguard.

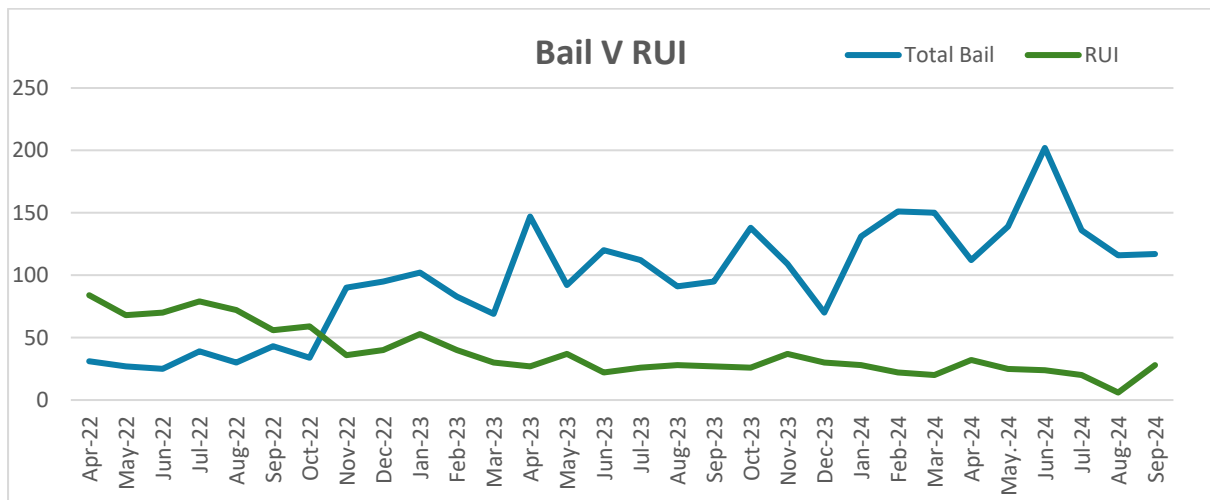
Current Position

3. Since the previous annual report and following recommendations in the 2018 HMICFRS custody inspection, a dedicated custody cadre was established which sits within Criminal Justice Services, Specialist Operations. This is staffed by 15 trained custody officers (sergeants) and 10 Dedicated Detention Officers (police staff) and is overseen by a Custody Management Inspector.
4. The establishment of the dedicated Cadre has professionalised the service provided within custody and led to increased focus on supporting vulnerable detainees and young people, the development of an effective performance framework and continuous improvement and training for officers.
5. Following the 2018 HMICFRS custody inspection, 23 areas for improvement were identified. Since this time, significant progress has been made against these outstanding recommendations which have now reduced to two, with both awaiting final sign off.
6. We are now expecting an imminent HMICFRS custody inspection, and as part of this improvement strategy, the Custody Management team alongside the Strategic Development team have undertaken proactive forward-facing work to make improvements prior to inspection. This has included reviewing other force custody inspection reports, national benchmarking and identifying and implementing best practice.
7. In addition, COLP have hosted a peer review from Thames Valley Police who have recently undergone their custody inspection to assist with learning and preparation for our inspection. A monthly custody newsletter is circulated to the Custody Cadre and is utilised to share learning from recent inspections, IOPC reports and reiterate policy, procedure and legislation.

Overall Custody Demand

8. The average monthly detainees passing through custody has grown steadily since COVID. In April 2021 this was 124 and reached a peak of 235 detainees in August 2023. For the last 12 months this has levelled out but is consistently above 210 detainees per month. (See Fig 2). This is consistent with a rise in some crime types and increase in frontline police officer numbers following the Police Uplift Programme.
9. In October 2022, legislation relating to bail changed as part of the Police Crime and Sentencing and Courts Act 2022. This removed the presumption against bail, to ensure victims, the public and suspects are safeguarded more effectively and to improve efficiency and timeliness of investigation.
10. As a result, there was a sharp increase in the number of suspects released on bail from October 2022 and a reduction in use of RUI (Released Under Investigation) (Fig. 1). The continued increase in suspects bailed is in line with the increase in detainees through custody and is consistent with the national increase in bail use following the legislative change.

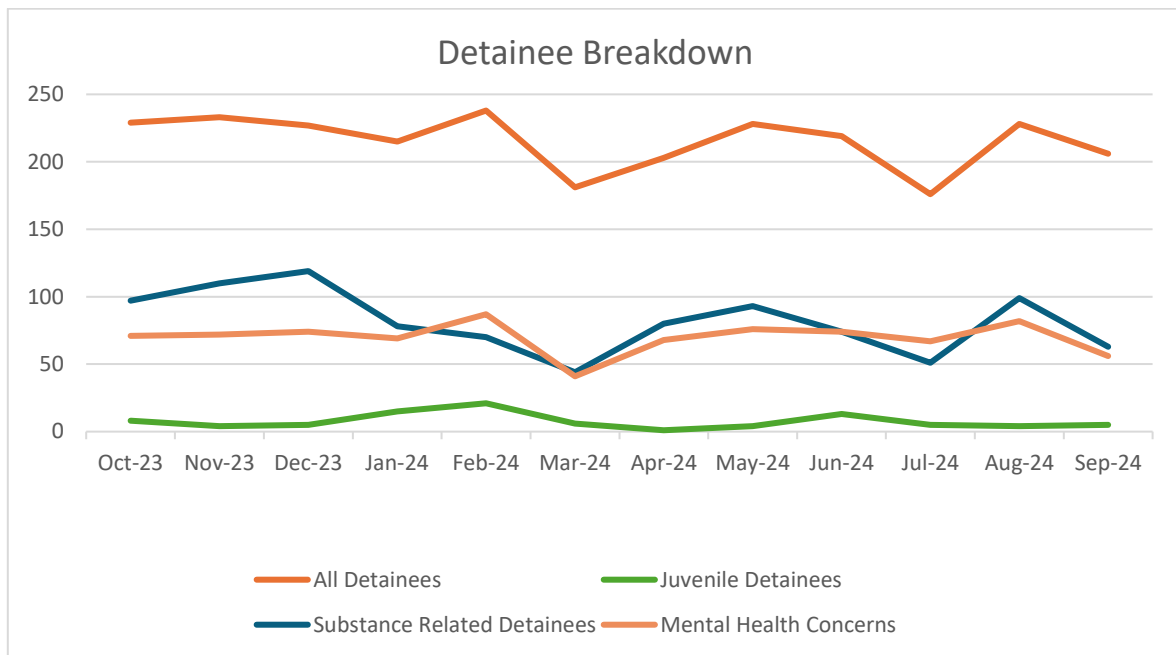
Fig. 1



Breakdown of Demand

11. Not only has the overall demand and number of detainees increased, but so have the complexities and vulnerabilities of those passing through custody, along with the legislative requirements and processes custody officers are required to follow. Fig. 2 demonstrates the breakdown of categories of detainees with specific additional needs and vulnerabilities:

Fig. 2.



12. The overall number of juvenile detainees continues to remain consistent and on an average month less than ten juveniles pass through custody. The average age of juvenile detainees over the past year, is sixteen. The youngest detainee was thirteen years old.

13. A significant proportion of overall detainees present with substance related issues and mental health concerns, (**Fig 3**) with on average over 50% of detainees being referred to the Healthcare Professional (HCP) and/or Liaison and Diversion services. (**Fig 4**)

Fig. 3.

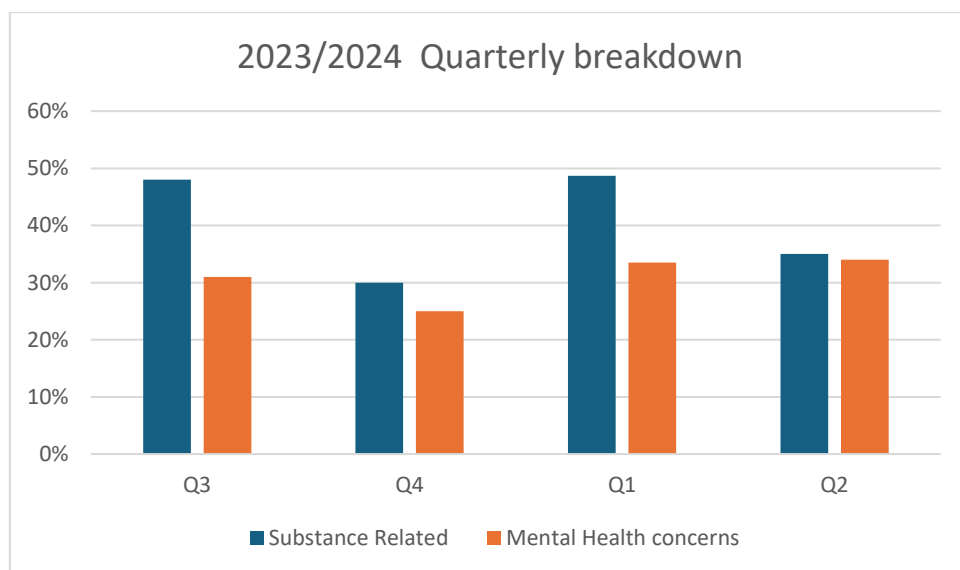
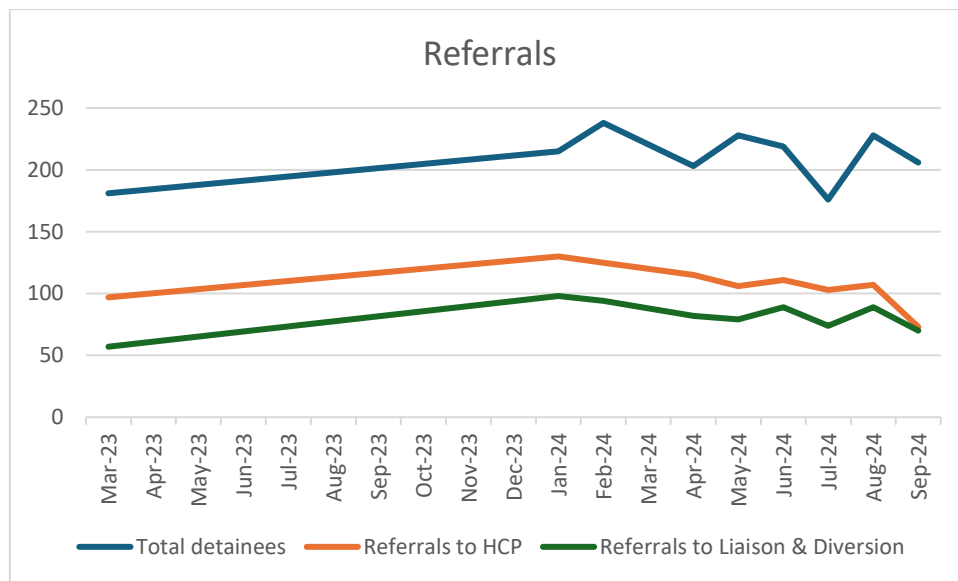


Fig 4.



14. PHL Group are contracted to provide an embedded healthcare service within custody. Detainees have access to this service 24/7 and custody officers are responsible for ensuring they are referred to the HCP (Healthcare Professional) when they present with medical concerns or mental health issues. The PHL contract, which is now in its third year, has been extremely successful, with PHL consistently meeting 100% of their Key Performance Indicators.

15. In addition, the East London NHS Trust are commissioned by NHS London to provide the local Liaison and Diversion services for those presenting in custody with mental health concerns. This is not a 24/7 service however email referrals can be made out of hours. The Liaison and Diversion services will assess and refer individuals to appropriate additional support where required.

Vulnerability

16. The custody environment can be an extremely overwhelming place for detainees, and this, coupled with the often chaotic or complex lifestyles of those that are arrested, places some detainees in a vulnerable position.

17. Much of the work of the Custody Management and Senior Leadership Teams over the past two years has focussed on effectively identifying specific vulnerabilities, improving the support available and managing risk to the detainees whilst in custody. There is also a focus on signposting people to relevant support services following their release. Over the past year, all custody officers and staff have been trained in the new College of Policing custody vulnerability package. Vulnerability features as a regular theme in custody continuous professional development (CPD) days where learning and best practise from other forces and agencies such as the Independent Office for Police Conduct (IOPC) is highlighted.

18. COLP have strengthened the response and support for children in custody, through the introduction of a range of distraction materials, changing processes

and introducing a bespoke pre-release risk assessment, to ensure that safeguarding measures and onward support have been identified and discussed prior to the release of any child or young person.

19. Following an identified area for improvement in previous HMICFRS inspections, the timeliness of attendance by appropriate adults has improved, through effective contract management and performance monitoring with The Appropriate Adult Service (TAAS), and the availability of a 'fallback' Appropriate Adult (AA) service where TAAS are unable to deploy within required timescales. This has ensured that young people and vulnerable detainees are provided with the necessary support and protection an AA provides.
20. In 2023 the percentage of detainees identified as requiring an appropriate adult was 10.71% for City of London, higher than the national average of 7.01%, demonstrating effective identification of vulnerable people. Of note, research by the National Appropriate Adults Network indicates that a much higher proportion of detainees nationally (39%) are likely to be vulnerable and may require an AA. City of London Police now co-chair the NPCC Betterment Workstream, currently working with national partners and academics to standardise custody risk assessment and improve identification of vulnerability.
21. COLP have embedded a support process for female detainees, ensuring they are provided with a female officer/staff 'buddy' whilst in custody and ensuring custody staff have been trained to understand the specific needs of females in custody. The HCPs are also aware of the range of support items available for females and in addition we offer healthcare/menopause screening for females over forty years old. This is linked to the findings of the recent Baird report and ensuring custody staff also have an understanding of how to respond to victims of Violence Against Women and Girls (VAWG) offences who may find themselves in custody.
22. COLP has become the first 'Veteran Accredited' custody suite, following work with PHL and the Veterans Covenant Healthcare Alliance, to ensure veterans in custody are offered support by a network of veterans within the force, and can access specific healthcare pathways available through the NHS. This has contributed to City of London Police Gold award for supporting Armed Forces under the Armed Forces Covenant. PHL have now rolled this model out through their other custody healthcare contracts, and it has been presented as national best practice at the recent National Custody Conference.
23. COLP have become the first force to pilot and roll out screening for ADHD within custody, recognising research suggesting there is an increased proportion of those with undiagnosed ADHD and other neurodiverse conditions within the criminal justice system which may impact their offending behaviour and likelihood of reoffending. This received national press interest and has been adopted by other Criminal Justice bodies both nationally and internationally.
24. The COLP relationship with Samaritans is well embedded and continues to provide valuable support for detainees whilst in custody and upon release. The partnership has recently been referenced in publications by the Independent

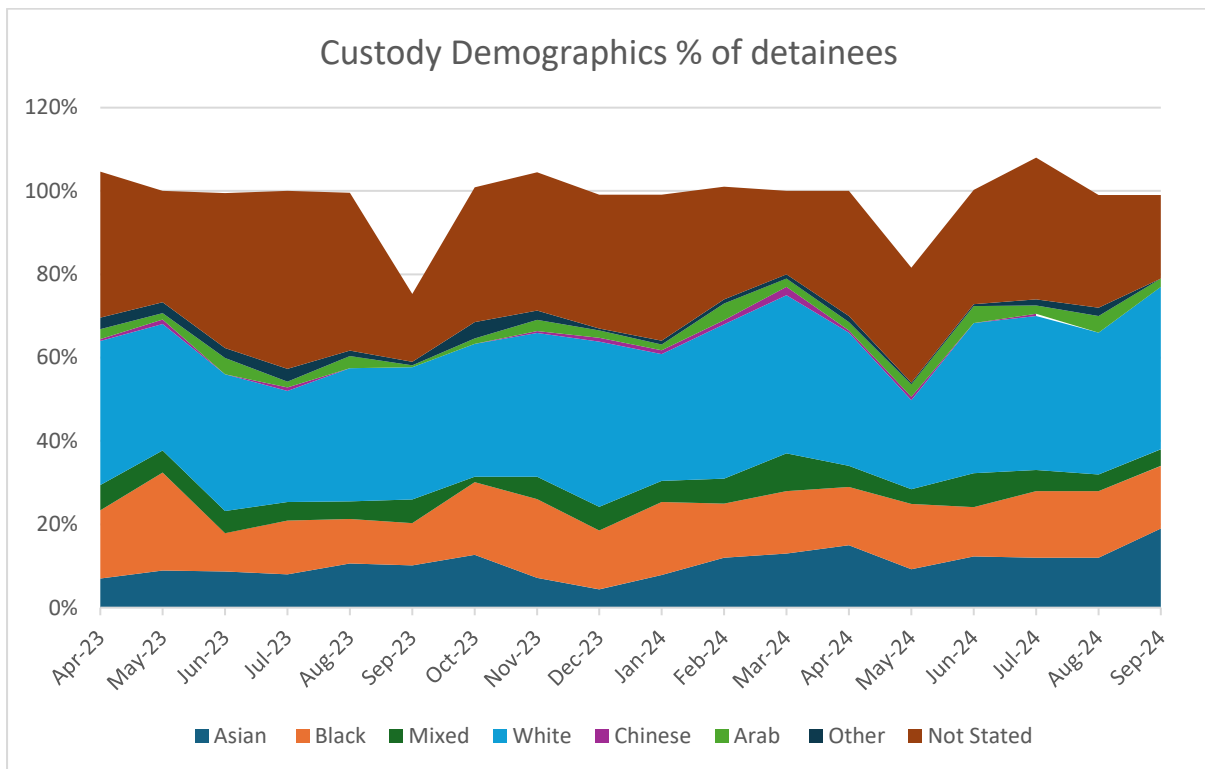
Advisory Panel on Deaths in Police Custody as innovative and best practice to assist in reducing deaths both in and following police custody.

25. Through the previous Government's funding for Drug Testing on Arrest, COLP has employed an Addiction Support Worker, to visit custody and support and signpost individuals to appropriate agencies within their area. This has been particularly effective and welcome due to the limitations on drug and alcohol provision now provided by Turning Point, following the withdrawal of dedicated Drugs Workers in custody. This was as a result of their own internal review of provision in police custody and demand for City/Hackney residents and a change in focus to community/voluntary support. Unfortunately, the government drug testing on arrest funding has now been withdrawn so at this time there are no identified funds to continue funding the Addiction Support Worker.

Equality Data

26. One of the recommendations following the 2018 HMICFRS inspection was related to effective scrutiny of equality data, to ensure the force has effective governance processes in place to review outcomes for those coming through custody and monitor disproportionality.
27. A custody performance dashboard has been developed which includes data over a range of metrics extracted from the Niche system. This includes EDI data and data relating to use of force, strip searching and juveniles in custody. This 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 Independent Custody Visitors (ICV) Chair and Police Authority Compliance Lead.
28. Moving forward, at force level, this data will feed into the quarterly Strategic EDI Board, chaired by the Commissioner. This ensures 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.
29. As shown in **Fig. 5**, the largest percentage of detainees define themselves as white, followed by black then Asian. A significant proportion are recorded as 'not stated' on the custody record. This is likely due to a combination of refusals and foreign nationals due to a language barrier. Further work is underway to review this against 'officer defined' demographic data to understand any differences.

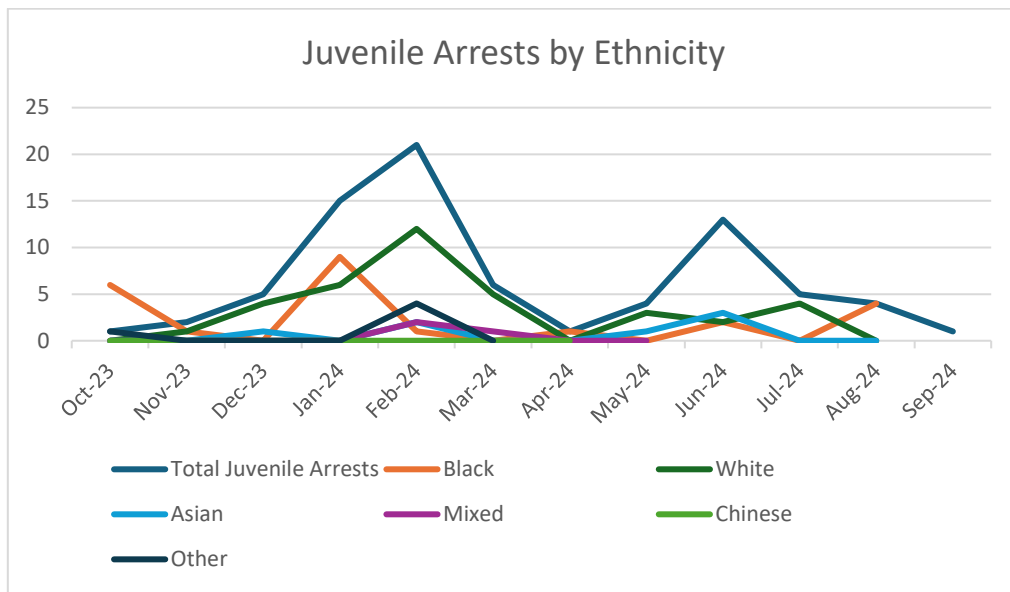
Fig. 5



30. Fig 5 also shows that the proportion of detainees from each ethnic background is fairly consistent and has not varied significantly over the past ten months. To note, the dip in September 2023 and May 2024 relates to 2 specific periods where custody was closed for maintenance work and as such the total number of detainees was reduced.

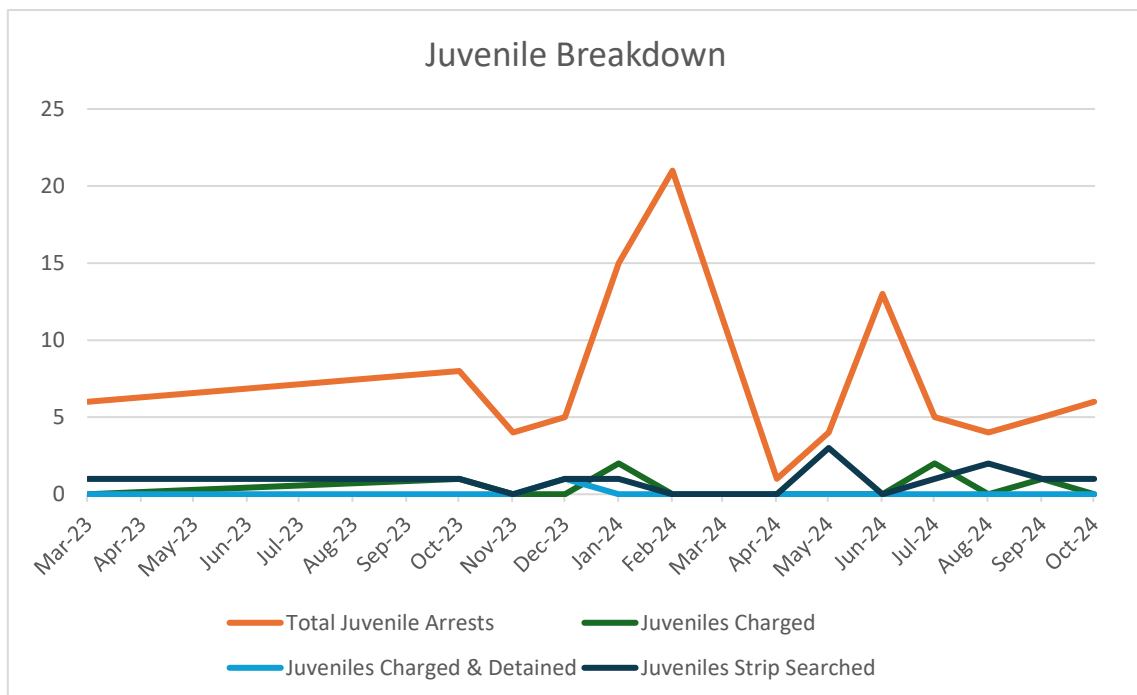
31. **Fig. 6** shows the juvenile detainee breakdown by ethnicity. The total number of juvenile detainees can fluctuate but is usually below ten and the proportion by ethnicity is consistent with that of the overall custody detainee breakdown.

Fig. 6.



32. **Fig. 7** shows the monthly breakdown of juvenile detainees who are charged and remanded and the number strip searched. This is consistently less than five per month. Only one juvenile has been charged and detained over the past twelve months which is a reduction of two from the previous twelve-month period.

Fig. 7.



33. Every juvenile detention record is scrutinised as part of the monthly custody dip sampling to ensure policy has been adhered to and appropriate safeguards have

been put in place for the young person, such as the presence of an appropriate adult, and ensuring sufficient grounds are recorded in line with PACE for any authorised strip search. The result of this dip sampling is fed into the Custody Management Group via the Custody Manager’s report. Any specific feedback for officers or staff is dealt with directly with the individual or shared as wider learning through continuous professional development days or the custody newsletter.

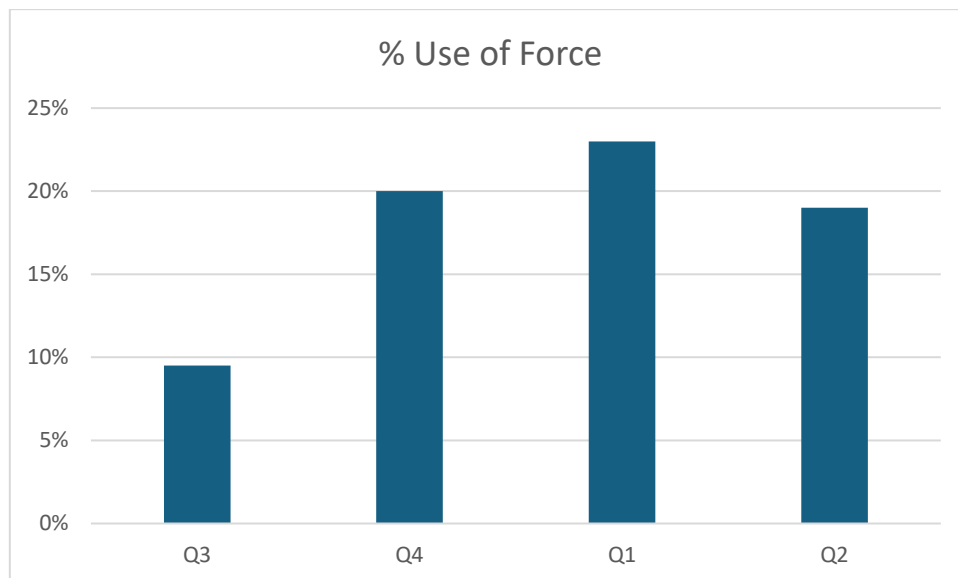
34. Further work is underway to obtain further demographic data, for example a breakdown of all strip searches by ethnicity and protected characteristics, and a breakdown of outcome data by ethnicity and protected characteristics.

Use of Force

35. As part of the monthly dip sample of custody records, the use of force is reviewed. This includes reviewing the detention log entry and rationale for use of force, alongside any available CCTV and completion of the required use of force form.

36. The results of these findings are reported into the Custody Management Group as well as the force’s Use of Force Steering Group. Fig. 8. Illustrates the percentage of custody records where a use of force on the detainee has been recorded. The most common use of force is application of handcuffs which makes up the majority of instances.

Fig. 8.



37. In addition to the monthly dip sampling, the Superintendent for Criminal Justice Services undertakes quarterly reviews of custody CCTV use of force. Learning is shared via the Custody Management Group and Use of Force Steering Group. Further to this, following more complex use of force incidents custody have also commissioned bespoke debriefs utilising the force’s Public and Personal Safety Training (PPST) instructors to identify learning and best practice.

External Scrutiny

38. In addition to the strong internal governance over custody matters, COLP are developing their external scrutiny, in line with national guidance following the Angiolini Inquiry, Lammy Review and recommendations from the Independent Advisory Panel on Deaths in Custody (IAPDC). In April 2023, the NPCC and APCC introduced optional guidance for PCCs and police forces to develop and introduce independent Custody Detention Scrutiny Panels (CDSPs), the objective being to assess and report on detention and custody processes and review and advise on matters of disproportionality.
39. The implementation of CDSPs was presented to the PAB as part of an ICV update report in June 2024 where it was agreed that due to the City of London's unique demographic, we would use our established Independent Advisory and Scrutiny Group (IASG) to scrutinise custody data on a quarterly basis.
40. A presentation was given to the IASG panel in May 2024, outlining the data that could be provided. Following agreement of the group to review custody data quarterly, the first data sample will be scrutinised at the November IASG meeting and will include data on use of force in custody, juveniles and ethnicity of detainees. The ambition is to include additional data relating to strip search, use of anti-rip clothing and outcomes, to allow more robust scrutiny as our data develops. This mechanism is similar to how other forces are introducing CDSPs and will provide a foundation on which CDSPs can develop in the City of London.

Estate

41. The Bishopsgate custody suite is an ageing facility, built approximately 20 years ago. Due to the constraints of both space and infrastructure within Bishopsgate Police Station, there are limitations to improvements that can be made. Custody facilities are required to adhere to the National Police Estates Group (NPEG) Design Guidelines. This is frequently updated following best practice and as technology develops.
42. Following the 2018 HMICFRS a number of recommendations relating to the estate were made, including the development of an exercise yard which is now in place. Ahead of the unannounced custody inspection, a proactive review of the custody estate was commissioned, and the NPEG conducted an assessment in 2023.
43. This resulted in a number of recommendations which have been reviewed, RAG rated and actioned where possible within the current building. This included a full redecoration of the custody suite, improved key security and replacement cell wickets to reduce ligature opportunities. There were a number of observations/recommendations that are not achievable within the current estate, for example, a secure vehicle dock, dedicated juvenile cells and booking in desk. In these cases, appropriate mitigation has been put in place and actions documented and the recommendations included in the accommodation programme to ensure inclusion in our new custody design.

Operation Safeguard

44. Operation Safeguard is the national contingency plan for the planning and delivery of policing support to His Majesty's Prison and Probation Service (HMPPS) in circumstances where:
- HMPPS forecast insufficient available prison capacity based on population projections and trajectory (14 days' notice).
 - HMPPS experience a loss of capacity through prisoner riot / disturbance (short notice).
 - In response to a sudden, un-projected rise in the prison population.
45. Delivery of Operation Safeguard is intended to ensure prison excess demand is managed and planned for, by using police cell capacity to alleviate temporary pressure on HMPPS prison supply. This is achieved through police forces temporarily holding prisoners who have been committed to prison service custody by courts if they cannot be received into a prison.
46. Due to the increasing pressure on the prison estate over the past 18 months, in July 2023, Operation Safeguard activations began across the country. City of London Police offered three police cells to the national response and these cells were first 'activated' for two months in October 2023, and for two further periods in May and August 2024. Cost recovery was undertaken within the agreed NPCC and HMPPS framework to cover any additional staffing and costs relating to accommodation and detainees.
47. During the activation periods, COLP were not required to hold any Op Safeguard detainees and there was minimal impact on our own business as usual. The income accrued from Operation Safeguard has been utilised to offset expenditure on the estate required as a result of the NPEG review and has allowed significant improvements and maintenance work to be undertaken with no impact on the custody budget.
48. Due to the Standard Determinate Sentence (SDS40) Early Release Scheme approved by the Labour Government in July 2024, this has significantly reduced the pressure on prison capacity and at this current time, Operation Safeguard national and local command structures are stood down, pending any significant change.

Corporate & Strategic Implications – [*Please state 'none' if not applicable instead of deleting any of the sub-headings below*]

None

[Sub-headings]

Strategic implications – Explain and provide assurance about how this proposal aligns with and will support the delivery of the Corporate Plan 2024-2029 (and note any CP performance metrics and associated data), any relevant corporate strategies and any relevant regional / national policies / international agreements.

Financial implications

Resource implications

Legal implications

Risk implications

Equalities implications – Explain how you have ensured the proposal complies with our public Sector Equality Duty 2010 - will the proposals within this report have any impact (positive or negative) on people protected by existing equality legislation – age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity? If so, this section should address how this will be factored into decision making, including reference to the Equality Impact Assessment if appropriate

Climate implications

Security implications

Conclusion

49. Police custody is a high-risk environment where custody staff are managing a wide range of vulnerabilities on a daily basis and demand continues to increase. The introduction of a dedicated custody cadre, and strong governance processes has professionalised custody services within the City of London. Appropriate measures and pathways have been developed to support vulnerable detainees whilst within police custody, through a range of innovative and well-established partnerships. Scrutiny of custody activities and EDI data continues to develop and the use of the IASG as an external scrutiny mechanism, will only strengthen our processes as we look to embed CDSPs. This will ensure openness, transparency, increasing public trust and confidence in this area.

Appendices

None

Anna Rice

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| | |
|---|------------------------------------|
| Committee(s) | Date: |
| Police Authority Board – for information Independent Custody Visitor Panel – for information | 4 December 2024 22 January 2025 |
| Subject: Independent Custody Visiting Scheme Annual Report 2023/24 | Public |
| Report of: Town Clerk | For Information |
| Report author: Rachael Waldron, ICV Scheme Manager, Town Clerk's Department | |

Summary

This report fulfils the requirement to update Members on the progress of the City of London's Independent Custody Visiting Scheme. It presents the panel's annual report and informs members of recent issues raised by the Independent Custody Visiting (ICV) Panel regarding custody provision in the City. Over the past year panel meetings have addressed various challenges related to the custody environment and the immediate operations of the scheme. This includes the re-introduction of Operation Safeguard, Appropriate Adult attendance during custody procedures recruitment and onboarding within the City Scheme.

Recommendation(s)

Members are asked to note the contents of this report.

Main Report

Background

1. The Independent Custody Visiting scheme is well established and has been functioning in its current capacity since November 2007. Members of the Police Committee agreed in May 2009, that a regular report would be presented to the Committee on an annual basis.

2. Independent Custody Visitors (ICVs) conduct unannounced visits in pairs to monitor the treatment and conditions of individuals held in custody. They ensure that the rights and entitlements of detainees are upheld and that their dignity is maintained. These visits are conducted independently and confidentiality in a voluntary capacity, with reports submitted to the City of London Police and the ICV Scheme Manager at the time of the visit. The Independent Custody Visitors (ICVs) panel, comprising all custody visitors, meets quarterly with the City of London Police, typically involving the Custody Manager (or Custody Representative in their absence). Serious concerns raised by visitors during these visits are escalated to the ICV Scheme Sponsor via the ICV Scheme Manager.

3. The visits take place weekly, with visits occurring once a week (from April 2023 to March 2024).

Current position

4. The ICV Annual Report summarises key issues identified within the custody environment, outlines remedial actions taken, and highlights examples of effective practices. Additionally, it details the objectives of the Independent Custody Visitors (ICV) Scheme for the current financial year.

Legal Implications

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

Conclusion

6. The City of London ICV Scheme offers an independent assessment of the treatment of detained individuals. This Scheme reflects the commitment and dedication of Independent Custody Visitors (ICVs) in maintaining appropriate oversight of custody practices.
7. The Panel records their thanks to all ICVs for their unwavering commitment to Independent Custody Visiting.
8. Further updates on this Scheme will continue to be provided to Members on an annual basis, ensuring transparency and continued engagement.

Appendices

- Appendix 1 – ICV Annual Report 2023/24

Background Papers

ICV Guidelines – January 2017 Police Committee

Rachael Waldron

ICV Scheme Manager – Town Clerk's Department

E: Rachael.Waldron@cityoflondon.gov.uk



Annual Report December 2024

City of London

Independent Custody Visiting Scheme

Foreword, by ICV Cohort of the City ICV Panel

In the last 12 months, the police service nationally has faced an array of challenges, due to concerns demonstrated by the wider public regarding trust and confidence in policing. This has frequently been compounded by the often difficult, demanding, and unpredictable nature of policing incidents and criminality; and perception of procedural justice – the fair and respectful treatment of citizens.

Custody is an important component of the Criminal Justice System. The City Independent Custody Visiting Scheme has continued to play a key role here, by continuing to act as critical friend to the City of London Police, ensuring that the provision of a detainee's rights, welfare and entitlements continues to be adequately addressed and delivered throughout the custody process. Our City scheme has learned more about the possible needs of detainees with physical and non-visible disabilities in custody, which has helped to build our awareness of how a detainee's needs may fluctuate and change throughout their stay in detention.

We have seen first-hand how an individual's experiences of the police, police conduct, and media coverage can affect trust and impact public perceptions of police performance. Nevertheless, throughout the course of the year we have observed examples of good practice and procedures across a full range of custody operations, which have led to positive interactions with detainees. We are pleased to report there were no deaths in custody, or following police conduct for the City of London Police during the period of 1 April 2023 to 31 March 2024.

We have been struck by the professionalism, care and engaging nature demonstrated by the City of London Police Custody Team to process detainees in a sensitive and appropriate way; and protect life in circumstances where there has been a real and immediate risk to it (as required under Article 2 of the European Convention of Human Rights).

Increasingly, the City of London Police have been required to undertake more complex and resource-intensive policing activity within custody. A combination of pre-planned and spontaneous public order events have presented considerable challenges in respect to public safety and security, which has led to the force providing more cross border support to assist policing operations outside the Square Mile. Protests Groups such as Just Stop Oil, Extinction Rebellion have continued to remain active across London, along with other protest groups linked to the Israel-Hamas conflict. On the occasion where protest has been experienced in the City, it has remained low level. On a small number of occasions, custody officers have been temporarily abstracted from custody and relocated to front line operations, which has required custody to function with minimal staffing levels.

Professional development opportunities have regularly been provided to sergeants and Dedicated Detention Officers (DDOs) via Continuous Professional Development (CPD) and bespoke training sessions throughout the course of the year. Invitations have been extended to us, from the City Police's Learning and Development Department to attend custody training and provide input in relation to the roles we perform in custody. It is evident that Custody Management have taken steps to foster learning, as several officers across the custody cadre have secured secondments and promotions. While we are encouraged by the opportunities presented for custody officers to broaden their skills and knowledge, we remain mindful of the vacancies that are created as a result of this progression. Continued contingency and succession planning will be required to ensure that custody staff can continue to manage the wide range of individual and diverse needs of detainees entering custody.

As expected, the number of individuals seeking mental health support from the City of London Police's support services has continued to increase, with many detainees arriving to custody in a volatile or emotional manner - often exacerbated by intoxication or mental health issues.

These types of concerns for welfare link to current cases of thematic work for the Independent Office for Police Conduct (IOPC) and His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) nationally.

While there has been a reduction in the use of police custody as a place of safety for people detained under Section 136 of the Mental Health Act (1983), we have been encouraged to see a culture demonstrated by the City of London Police which emphasises the importance of protecting vulnerable people. The City of London Police have piloted several new and innovative partnerships this year, which has led to increased rapport between custody staff and detainees and improved provision of individualised care.

There are a wide range of policies and partnerships currently in operation across Bishopsgate Custody such as the Samaritans Listening Service, Alcoholics Anonymous and Narcotics Anonymous and Veterans Aid which have continued to provide detainees with opportunities to receive mental health support during health crises. Additionally, the City of London Police have continued to develop progressive methods to meet the needs of vulnerable people; and support detainees with neurodiversity and mental health vulnerabilities. A good example of this includes the issue of autism passports that can be supplied to a detainee, which may help with any future police interaction.

In May 2023, the City of London Police became the first police force in the country to screen those detained in custody for attention deficit hyperactivity disorder (ADHD). This has helped to increase awareness and education of neurodiversity and ensure detainees with mental health conditions or disorders accurately identified and supported throughout the detention process. Much of these well-developed partnership arrangements, have most notably resulted from the Mental Health Crisis Concordat which has helped to bring about a shared and consistent understanding of vulnerability among City of London Police officers and staff.

While the City of London Police have taken steps to develop better mental health triage services that are equipped to meet the needs of vulnerable people, we recognise from a holistic perspective that the quality of interactions and co-operation between the force, wider public sector and protective services (E.g. social services, health and housing) requires improvement, with each service fully discharging its responsibilities so that the force and Bishopsgate custody does not become the default position for vulnerable people in crisis.

As a Panel, we will continue to work jointly with the City of London Police to ensure that they are consistently achieving the recommendations set out in His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) 2018 Inspection; and sufficiently prepared for their forthcoming reinspection. We will also continue to work with the Independent Custody Visitors Association (ICVA) to ensure that national themes are addressed.

We would like to express our sincere gratitude to our late Chair, Mr Godfrey Baillon-Bending, who greatly impacted the work of this Scheme during his tenure as Chair.

We also extend our thanks for the City of London Police, Custody Manager, Lead ICV Scheme Sponsor Member from the Police Authority Board and the City of London Scheme Manager for their continued commitment to the Scheme.

Deborah Oliver, ICV Scheme Sponsor, Police Authority Board

Foreword, by Independent Custody Visiting Scheme Sponsor, Police Authority Board Member Deborah Oliver:

Several events have occurred nationally over the last year that have undermined public confidence in, and perceptions of, police legitimacy and procedural justice in custody. This situation has raised concerns regarding the fairness and effectiveness of police interactions with the public in their efforts to tackle rising crime and ensure public safety.

The City Independent Custody Visitors Scheme (ICV) plays a crucial role in building trust and safeguarding detainee welfare in the City of London. Additionally, it supports the City of London Police in delivering quality service through volunteer oversight.

Despite significant challenges, Independent Custody Visitors have remained committed to providing effective oversight on behalf of the Police Authority. They have continued to act as critical friends to the force, sharing insights from their visits to enhance custody conditions and advocating for equitable care for all individuals entering the detention process. The sudden death of Chair, Godfrey Baillon-Bending, was much regretted and his expertise, experience, leadership and deep insight has been missed.

Independent Custody Visitors have expressed their findings and opinions freely, bringing attention to discomfort of individuals held in custody and highlighting notable practices within custody operations.

The City of London police have continued to face challenges in managing increased numbers of detainees with diverse needs due to planned and unplanned protest activities. This situation is expected to persist, making ongoing contingency and succession planning for custody staff vital - to ensure the necessary resources are available.

I am pleased to see the City of London Police spearheading initiatives in neurodiversity, particularly through the introduction of the Mental Health and Neurodevelopmental Checklist (MHND); and ADHD screening

programmes for detainees; and would encourage the force to further develop partnerships and explore funding opportunities for this essential work.

Overall, feedback I have gathered from Independent Custody Visitors (ICVs) underscores the dedication and professionalism of custody staff. However, it also identifies areas for improvement, particularly in the efficiency of recruitment and vetting procedures for custody staff and the ICV community. The dedication and professionalism of custody staff are commendable. However, there are areas requiring improvement. Among these, the attendance times of Appropriate Adults, defined as individuals who assist vulnerable persons during police custody, is particularly critical; they should consistently attend within 90 minutes. Additionally, a code complaint custody suite should be established during the transition to the new custody estate. Improving operational resilience across the existing voluntary scheme could significantly improve the effectiveness of the independent custody visiting scheme.

I look forward to seeing both the City ICV Scheme and City of London Police build on these improvements in the coming year.

INTRODUCTION

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

The purpose of this report is to provide an overview of the City of London ICV Scheme in the period of 1 April 2023 to 31 March 2024 including:

- the Panel's performance.
- areas of good practice or issues and concerns the visits have raised; and
- objectives of the ICV Scheme for 2023/24.

The City of London Corporation, as the Police Authority for the City, is a separate body to that of the City of London Police. It has a statutory duty to ensure the delivery of the Independent

Custody Visiting Scheme. Oversight of the ICV Scheme is provided by the Police Authority Board.

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

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

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

The City of London ICV Panel currently consists of 5 volunteers who visit the custody suite situated at Bishopsgate Police Station on an unannounced basis once a week.

The City of London ICV Panel collaborates closely with the Mayor's Office for Policing and Crime (MOPAC) to highlight issues in custody detention, such as delays in the attendance of Appropriate Adults and legal representation for detainees.

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

THE ROLE OF INDEPENDENT CUSTODY VISITORS

To ensure the safety and wellbeing of volunteers, it is mandatory for visits to custody to be undertaken in pairs. Visits to custody are made on an unannounced basis so ICVs can

look, listen, and report on conditions in custody at the time of their visit.

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

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

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

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

- details of any good practice ICVs have observed during their visit;
- reference to any immediate problems encountered and resolved at the time of visiting; or
- details of any matters requiring further action.

Copies of the reports are provided to the Superintendent (if appropriate), the Custody Manager and the ICV Scheme Manager. The

information provided within each report is discussed by the ICV Panel at the next review meeting. If necessary, more serious issues can be highlighted directly to the Police Authority Board or dealt with outside Panel meetings.

PANEL MEETINGS

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

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

Topics discussed this year included:

1. Recruitment of New ICVs

Membership of the Panel has reduced from 7 to 5 as a result of the untimely passing of the City ICV Scheme Chair and departure of the Vice Chair, which has reduced the capacity of the scheme significantly.

Outcome: The Scheme Manager has taken steps to utilise existing recruitment channels internally to promote the work of the City Scheme; and has committed to an ultimate target of appointing eight new volunteers to the City Scheme.

Separately, The Scheme Manager and the City of London Police are in the initial stages of agreeing an 'onboarding process,' to improve the effectiveness and efficiency of the onboarding and ongoing maintenance of the ICV Scheme volunteers, providing clarity on roles and responsibilities.

This process is expected to enhance the effectiveness and representation of the City ICV Scheme; and is expected to be finalised in May 2024.

2. Re-introduction of Operation Safeguard

In February 2022, the Ministry of Justice notified the National Police Chiefs' Council to make custody cells available to house lower risk male detainees, as part of Operation Safeguard.

Outcome: Three custody cells have been allocated to house male defendants under Operation Safeguard at Bishopsgate Custody during 2023/24. The City of London Police have continued to keep both cells available while this operation has been ongoing. It should be noted that no cells were required during 2023/24.

3. Use of Force

Scrutiny and oversight of the use of force remain recurring themes in recent inspections conducted by His Majesty's Inspectorate of Constabulary and Fire & Rescue services.

There has been a steady increase in the number of detainees experiencing use of force during their detention in City custody, rising from 5.6% last year to 10.4% during this reporting period. This increase is attributable to enhanced reporting practices. It should be noted that most incidents of force occur while detainees are in handcuffs.

Outside these specific instances, the rationale for use of force is evaluated through CCTV footage. Reviews of records have highlighted:

- good and thorough rationale provided by officers in use of force reports supporting use, with detailed descriptions of detainee behaviour and risk and
- detailed explanations of officer rationale provided to the ICVs querying use of force during visits; and following review of individual detainee custody records.
- CCTV of Use of Force is viewed on CCTV monthly by Custody Managements and quarterly by the

Superintendent responsible for custody.

- CCTV has shown officers engaging with detainees, exhibiting patience and de-escalation.
- Monthly reviews of Use of Force Forms by the Custody Manager – allowing for opportunities to improve performance and improvements to the information recording in custody records.

4. Mental Health Initiatives in Custody

Veterans Aid

In May 2022, the City of London Police launched expedited support for veterans in custody, aimed at identifying and assisting ex-servicemen and women at risk of homelessness.

The partnership is centred around a poster campaign directing officers to the charity, encouraging them to 'Approach, Engage and Advise'.

Outcome: Veterans requiring support are automatically referred to Veterans Aid, where they receive bespoke, individualised assistance.

Introduction of the Mental Health and Neurodevelopmental Checklist (MHND)

In March 2023, the City of London Police volunteered as one of five pilot forces to test a new mental health and neurodevelopmental checklist.

This checklist, developed by the Crown Prosecution Service (CPS) and the National Police Chiefs' Council (NPCC), is designed to enhance the quality of information provided to the CPS prosecutors before charging suspects and making case management decisions.

Outcome: The checklist ensures that detainees with mental health conditions or disorders are accurately identified early in the interview process. It also prioritises information sharing

between agencies while upholding the rights of vulnerable individuals.

Launch of PHL Group Mental Health and Neurodevelopmental Checklist (MHND)

In November 2023, the City of London Police launched a second MHND screening pilot with PHL Group, where embedded healthcare professionals conduct screening.

Outcome: A non-judgemental, patient focused approach allows for the immediate healthcare needs of detainees to be addressed.

Launch of ADHD Screening Programmes for Detainees

In 2021, Dame Sally Coates' released a report for His Majesty's Inspectorate of Prisons for England and Wales. In this report she suggested that at least 50% of prisoners may exhibit some form of Neurodivergence. This figure is believed to be significantly higher in the City of London (75%), where the force has begun screening for Attention Deficit Hyperactivity Disorder (ADHD) in custody.

A checklist for ADHD was devised by Sarah Templeton, who has worked in four English prisons.

Outcome: This checklist ensures that there is a clear pathway to diagnosis, with urgent cases fast traced to an NHS provider for ADHD assessments.

This analysis will also evaluate the prevalence of undiagnosed ADHD among detainees, with anecdotal evidence suggesting a rate as high as 85%. This highlights a critical issue that necessitates the adoption of the City of London model by all police forces.

Implementing this approach could also enhance our understanding of the underlying issues and contribute to reducing reoffending.

Samaritans Listening Service

In June 2022, HMICFRS published 'Expectation for Police Custody', which outlines the framework and criteria for inspectors to assess

police custody arrangements and detainee outcomes across all police forces in England and Wales.

The framework emphasises the treatment conditions and standards required by the inspectorate and highlights the necessity for police services to collaborate with partner services to divert vulnerable adults and children away from custody and ensure their welfare.

Outcome: As of March 2024, it had been 32 months since the Samaritans partnered with the City of London to support individuals entering policing custody and officers across the workforce.

The success of the partnership includes:

- Recognition of ‘good practice’ by the Independent Office for Police Conduct (IOPC), National Police Chiefs’ Council (NPCC), Association of Police and Crime Commissioners (APCC) and Independent Advisory Panel for Deaths in Custody (IAPDC)
- Seven forces at various stages of implementing their own Samaritans partnerships based on the CoLP model (with some regional variations to suit their locality)
- The integration of Samaritans into CoLP policing initiatives, including Operation Reframe and well-being events.
- Training sessions focused on input and organisational development.

A total of 170 officers and staff have received listening training from the Samaritans.

5. Final Project Plan for custody at Fleet Street

Consultation with internal and external stakeholders has continued during this reporting period.

It is crucial that the new facility reflects a multi-agency approach to engagement during detention. This includes providing opportunities for diversion through mental health, substance misuse support while maintaining the dignity of detained persons.

The Scheme Manager and the City ICV Panel have emphasised the need for updated design plans that acknowledge advancements in policing and technology (i.e. exercise yard CCTV), while also supporting officers and staff in the custody environment.

Outcome: Ongoing collaboration with the City of London Custody Management Group (CMG) and CoLP’s Director of Estates and Support Services, aims to ensure that all stakeholders, including the ICV Scheme Manager and ICV Cohort are consulted on design plans and have the opportunity to provide input before the new custody estate at Fleet Street is finalised.

It is expected that stakeholders will have further opportunities to input on Stage four of the full design process in early 2025.

Appropriate Adult Attendance

The provision of an Appropriate Adult’s oversight of proceedings undertaken with juvenile and vulnerable adults held in police custody is a safeguard enshrined within the Police and Criminal Evidence (‘PACE’) Act (1984).

The Appropriate Adult plays a crucial role in safeguarding the rights and welfare of children and vulnerable adults suspected of a criminal offence.

The Appropriate Adult ensures that these individuals are treated fairly and justly, enabling them to participate fully throughout the detention process. The primary responsibility of the appropriate adult is to facilitate communication and accompany the vulnerable detainee or juvenile during police interviews and other key moments in the detention process, including the collection of samples and bail charging.

According to national standards, response times for appropriate adult attendance should not exceed 90 minutes.

Outcome: Appropriate Adult arrival times demonstrate a (77.5%) compliance rate for arrivals within 90 minutes.

The ICV Scheme Manager has liaised with the Custody Manager to ensure that each detainee receives support from an Appropriate Adult under an annual contract.

Monitoring meetings have continued to occur throughout this reporting period between the Custody Manager and the Commissioning team to review key concerns.

The City of London Police have continued to maintain an on-the-spot purchase solution with the Appropriate Adult Network to address slow attendance times.

6. National Police Estates Group (NPEG) Gap Analysis

The City of London Police have commissioned the National Police Estates Group (NPEG) to conduct a Gap Analysis of custody. This analysis aims to identify immediate safety issues that require remedial action and is scheduled to take place in May 2023.

Outcome: Despite the challenges posed by an aging custody estate, the City of London Police have taken steps to address the following concerns:

- Specifically, cell doors that have failed ligature tests have been replaced.
- A new wicket has been installed in 15 cells to enhance safety protocols.
- Privacy screen issues (caused by a limitation in space within custody)
- A thorough analysis of the financial implications associated with the installation of new handwash basins for detainees.

- Implementation of a secure storage solution for keys: enhancing safety and minimizing the risk of unauthorised access within the facility.
- Introduction of a modern cell buzzer system to improve communication and response times, thus enhancing the overall safety and security of the facility.
- Updating the aesthetics of the cells, including painting ceilings: to contribute to a more human environment, which may positively impact the mental wellbeing of detainees.
- Upgrading CCTV system: crucial for enhancing surveillance capabilities and ensuring the security of both detainees and staff.
- Revamping the custody suite interview rooms: to improve functionality and ensure a more professional atmosphere conducive to respectful interactions.

7. Priorities for 2024/25

City ICVs continue to report on a professional custody environment.

The commitment and dedication of volunteer visitors ensures an appropriate level of scrutiny; however further opportunities have been identified across the following areas:

- To work with City of London Police to ensure feedback provided by ICVs regarding the custody design programme for Fleet Street is reflected in the consultation process and delivery of a code compliant custody suite.
- Strengthen the resilience of the City Scheme through the recruitment of new volunteers.

- Work with ICVA and other ICV Schemes to ensure that national themes are addressed.
- Work with the City of London Police to continue to address the recommendations made by the HMICFRS following their inspection in 2018.
- Deliver a Compliant Independent Custody Visiting Scheme, in accordance with the Independent Custody Visiting Association (ICVA) Quality Assessment Framework.

Visit Statistics

| | Total number of detainees in Custody at time of visit | No of detainees offered visit | No. of detainees accepted visit |
|----------------|---|-------------------------------|---------------------------------|
| Bishopsgate Q1 | 40 | 24 | 15 |
| Bishopsgate Q2 | 34 | 25 | 20 |
| Bishopsgate Q3 | 31 | 13 | 12 |
| Bishopsgate Q4 | 34 | 15 | 15 |
| Total | 139 | 77 | 62 |

ISSUES AND CONCERNS ARISING FROM VISITS

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

| | Bishopsgate |
|---|-------------|
| No of Total Visits | |
| Report Form with no matters requiring a police response | 0 |
| Infrastructure/furnishings/fittings/out of service | 37 |
| Comments individual officers – Positive | 20 |
| Comments individual officers – negative | 0 |
| Cleaning, tidiness and general hygiene – positive | 1 |
| Cleaning, tidiness and general hygiene negative | 3 |
| Information Technology | 7 |
| Temperature | 4 |
| Health related matters | 21 |
| Procedures not followed | 0 |
| Rights and entitlements seemingly delayed | 10 |
| Personal hygiene requests – (showers, washing etc) | 8 |
| Requests for phone calls | 8 |
| Perceived risk to detainees | 0 |
| Periodic checks (15, 30 minutes) not maintained | 0 |
| Requests for food and drink | 1 |
| Requests for literature/documents | 4 |

| Station | Target No of Visits | Achieved | % of Target |
|-------------|---------------------|----------|-------------|
| Bishopsgate | 52 | 47 | 90.38 |

DAYS OF VISITS

| | No of Visits | % (figure expressed to two decimal place) |
|-----------|---------------------|--|
| Monday | 4 | 8.51 |
| Tuesday | 7 | 14.89 |
| Wednesday | 15 | 31.91 |
| Thursday | 12 | 25.53 |
| Friday | 5 | 10.63 |
| Saturday | 4 | 8.51 |
| Sunday | 0 | 0 |
| Total | 47 | |

TIME OF VISITS

| | |
|-------------|----|
| 00.01-06.00 | 0 |
| 06.00-12.00 | 18 |
| 12.01-18.00 | 20 |
| 18.01-00.00 | 9 |

DAYS OF VISITS/TIMES – COMBINED

| | Monday | Tuesday | Wednesday | Thursday | Friday | Saturday | Sunday |
|--------------------|---------------|----------------|------------------|-----------------|---------------|-----------------|---------------|
| 00.01-06.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 06.00-12.00 | 2 | 3 | 5 | 4 | 1 | 3 | 0 |
| 12.01-18.00 | 1 | 2 | 6 | 6 | 4 | 1 | 0 |
| 18.01-00.00 | 1 | 2 | 4 | 2 | 0 | 0 | 0 |
| | 4 | 7 | 15 | 12 | 5 | 4 | 0 |

| | |
|---|---|
| Committee(s): Police Authority Board – For Information Policy and Resources Committee – For Information Port Health and Environmental Services Committee – For Information Licensing Committee – For Information | Dated: 04/12/2024 12/12/2024 07/01/2025 06/02/2025 |
| Subject: Terrorism (Protection of Premises) Bill – ‘Martyn’s Law’ | Public |
| Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly? | Diverse Engaged Communities |
| Does this proposal require extra revenue and/or capital spending? | N |
| If so, how much? | £ |
| What is the source of Funding? | |
| Has this Funding Source been agreed with the Chamberlain’s Department? | Y/N |
| Report of: City Remembrancer | For Information |
| Report author: James Edwards, City Remembrancer’s Office | |

Summary

This report outlines the provisions of the Terrorism (Protection of Premises) Bill, also known as “Martyn’s Law” and any implications for the City of London Police and Police Authority Board.

Recommendation(s)

Members are asked to note the report.

Main Report

Background

1. The Terrorism (Protection of Premises) Bill was first introduced in the House of Commons in September 2024 and, at the time of writing, awaits its report stage in this first House.
2. The Bill follows a draft Bill introduced by the previous Conservative government which underwent pre-legislative scrutiny by the Home Affairs Committee, to which the City of London Corporation submitted evidence.
3. The Bill would implement a commitment contained in Labour’s General Election manifesto to strengthen the security of public events and venues, requiring those responsible for publicly accessible venues to take action to reduce the threat to the public from terrorist attack.

4. The Bill has cross-party support and has, so far, progressed quickly through its initial legislative stages. Its progress seems likely to continue to be relatively quick given support for the Bill's aims on both sides of the House.

Current Position

5. The Bill requires persons responsible for qualifying premises or qualifying events to take steps to reduce the risk of physical harm to individuals arising from acts of terrorism and – for qualifying events and larger premises – to take steps to reduce their vulnerability to acts of terrorism.
6. Qualifying premises are split into two categories – those standard duty premises that can be expected to host between 200 and 799 individuals from time to time, and enhanced duty premises that can be expected to host 800 or more individuals from time to time. Schedule 1 to the Bill sets out in more detail those premises that fall within its scope.
7. Qualifying events are defined as events likely to be attended by 800 or more members of the public and where access to the event will be controlled by checking tickets or passes or taking payment. The Mayor of London's New Year's Eve fireworks display would be an example of an event that fell into this category, while the Lord Mayor's Show is not.
8. The Bill's requirements for standard duty premises are intended to be simple, focusing on having specified procedures in place to follow in the event of a terrorist attack, including in regard to lockdown, evacuation, evacuation and communication. Those responsible for standard duty premises will be required to implement reasonably practical public protection procedures as appropriate for their premises, and to notify the Security Industry Authority (SIA) that they are responsible for the premises.
9. For enhanced duty premises and qualifying events, the Bill requires the responsible people to notify the SIA in the same manner as for standard duty premises. They are also required to put in place reasonably practical public protection measures to reduce the vulnerability of the premises or event to an act of terrorism, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby. They are also required to provide the SIA with a document setting out the public protection measures that have been put in place.
10. The Bill will establish the SIA as the regulator, which will be given functions in relation to inspections and enforcement. It will be given powers to issue compliance notices and monetary penalties for contraventions in relation to all qualifying premises and events and, in relation to enhanced duty premises and qualifying events, it may also issue restriction notices.
11. For the most part the requirements will be enforced by way of civil penalties and other civil measures. For a contravention in relation to standard duty premises, the maximum amount of a non-compliance penalty is £10,000. For enhanced duty premises or a qualifying event, the maximum penalty is £18 million or %% of the

person's qualifying worldwide revenue. Daily penalties for continuing contraventions are set by the Bill at £500 and £50,000 for standard and enhanced duty premises, respectively.

12. The Bill also creates certain criminal offences: for providing false or misleading information to the Security Industry Authority; for failing to comply with a restriction, compliance or information notice; for impersonating an inspector; and for obstructing an inspector. The Security Industry Authority will be required to issue guidance as to how it intends to exercise its functions, particularly its powers of investigation. The guidance will need to be approved by the Secretary of State. The Security Industry Authority must provide an annual report to the Secretary of State, who will be able to issue directions to the Security Industry Authority, as part of their oversight of the body.
13. The Bill also makes amendments to the Licensing Act 2003 and the Licensing (Scotland) Act 2005, mandating that all new licence applicants applying for a premises licence in England, Wales and Scotland will be required to supply two plans to the Local Licensing Authority in support of the application. The first plan will be a detailed plan for the Local Licensing Authority's use, whilst the second plan - which is the new component of this provision - will be a less detailed plan that will be made available for public inspection.

Implications for the City of London

14. While the Bill makes no direct requirements of the City of London Police, the City of London Corporation itself will be in scope of the Bill, both as a venue operator and as a Licensing Authority. That said, it should be noted that the Corporation would already be compliant with the obligations based on venue operators by the Bill.
15. The Corporation's evidence to the pre-legislative scrutiny stage of the draft Bill set out a number of concerns, including with regard to the Bill's application to 'unboundaried' events, the resource available to develop protection plans under the Bill, and how they would be enforced.
16. While the revised Bill has provided some clarity with regard to enforcement, with the designation of the SIA as the regulator, it is clear that the SIA will need significant upskilling and staffing. The development of guidance by the SIA will be critical in determining how the City Corporation works with them in respect of overlapping areas of responsibility and future collaborative working. Understanding how the SIA will interact with Licensing and Health and Safety authorities will also be relevant.

Corporate & Strategic Implications

Strategic implications – This Bill stresses the importance of public safety in publicly accessible venues and events. Work undertaken by the City Corporation to develop a counter terrorism strategy means it is well placed to respond to Government legislation in this area. The City Corporation recognises the public's expectation that it must do all it

reasonably can to keep them safe, particularly in a part of the UK uniquely at risk given its role in the UK economy.

Financial implications – none

Resource implications – The Bill will require the Corporation to develop - where not already in place – public protection plans and other measures required of qualifying premises under the Bill. Counter-Terrorism-related testing may also be required, despite the disruptive impact on ‘Business as Usual’, in order to fully meet obligations under the Bill.

Legal implications – Non-compliance with the requirements of the Bill would lead to civil or criminal liability.

Risk implications – Compliance with the requirements of the Bill is, to some extent, reliant on the SIA’s development of appropriate guidance and on increasing its capacity to undertake the work of regulator. Delay in this area will increase the risk of non-compliance. Any counter-terrorism-related testing done in order to meet obligations under the Bill is likely to have a disruptive impact on ‘Business as Usual’ working.

Equalities implications – None

Climate implications – None

Security implications – Planning for counter-terrorism-related testing in order to fully meet obligations under the Bill is likely to have a disruptive impact on ‘Business as Usual’.

Conclusion

17. The requirements in the Bill will have implications for the City of London Corporation as a venue operator and licensing authority, if not directly for the City of London Police, though it is important to note that the Corporation would already be compliant with the obligations placed on venue operators. The Bill currently awaits its Report Stage in the House of Commons and passage through the House of Lords.

Appendices

- None

Background Papers

- City of London Corporation submission to the Pre-Legislative Scrutiny – <https://committees.parliament.uk/writtenevidence/122129/html/>
- Terrorism (Protection of Premises) Bill 2024 – <https://publications.parliament.uk/pa/bills/cbill/59-01/0119/240119.pdf>

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| | |
|---|---|
| Committee(s): Professional Standards and Integrity Committee Police Authority Board | Dated: 25 November 2024 4 December 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 | For Information |
| Report author: Det Supt Kate MacLeod | |

Summary

With our EDI strategy launched, new EDI Governance is in place internally and much activity is underway to drive these ambitions forward.

Inclusivity, Culture and Organisational Development (ICOD) are now prioritising our Implementation Plan and Evaluation framework. We also continue to deliver against our own internal actions plans as well as Nationally driven reporting and HMICFRS Inquiry.

A range of modules have been delivered over our Summer period, cementing our active bystander and ethical dilemmas products and building in events to coincide with White Ribbon Month in November 2024. We are working hard to create new material to land from January 2025 onwards, including modules on extremist ideology and a project with Exeter University on Intercultural Communication.

The ICOD team continue to support CoLP Staff Networks and Associations in attending National conferences. Last month, representatives from our Chief Officer Team, ICOD and Black Police Association attended the 3 day National Black Police Association conference and are meeting this month to take actions forward. Under our new governance structure we are ensuring that their voices are heard and that actions are being taken against the challenges and risks highlighted.

Although demands upon ICOD remain considerable, due to both internal challenges and external scrutiny, we are now seeing progress with recruitment activity and new postings into the team.

1. Internal Updates

EDI Strategy, Governance & Accountability

Since our last report, we have held our inaugural EDI Delivery Board and an additional EDI Strategic Board, both of which have employed our new governance structure and 'accountability-focused' agenda.

Our EDI dashboards remain quite primitive, however these are being developed with support from the Strategic Development Unit. With our Strategy now fully launched and much action already, we continue to work on our final 'implementation' plan and will share this in due course.

Inclusivity Programme

Over the last period, the ICOD team have delivered as follows –

'Ethical dilemmas':

- 90 Ethical Dilemmas places on Inclusivity Programme modules were available between July and Sept of this year.
- Between 1st of July and 30th of September, a total of 41 places have been taken. Approximately 1,620 employees are eligible to participate which could be an elective module as part of their inclusivity programme,
- All sessions have received 100% feedback.
- We are improving our feedback by making this a mandatory part of attendance.
- 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.

'Understanding Ideologies linked to Extremism':

- 30 Understanding Ideologies linking to Extremism places on Inclusivity Programme modules were available between July and Sept of this year.
- We continue to analyse the register for how many places were taken between 1st of July and 30th of September. 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 as part of their inclusivity programme journey.

- All sessions have received 100% feedback.
 - We are improving our feedback by making this a mandatory part of attendance.
 - 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.
- 'Active Bystander':**
- 30 Active Bystander places on Inclusivity Programme modules were available between July and Sept of this year.
 - Between 1st of July and 30th of September, a total of 20 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 100% feedback.
 - We are improving our feedback by making this a mandatory part of attendance
 - 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.

Please see appendix A for a breakdown of the feedback we have received as a result of our most recent Inclusivity Programme modules.

Code of Ethics Roadshow

The College of Policing (CoP) have invited CoLP to host a 'Code of Ethics Roadshow'. This is scheduled to take place on Monday 25th November.

As part of their visit to the City, Senior representatives from the College will observe some of our formal internal meetings as well as meeting informally with colleagues from across all ranks and roles. The aims of this roadshow include: -

- To illustrate to partners our open and transparent approach to all we are doing to improve EDI,
- Highlight key issues and challenges in the City, providing greater context to our EDI workstreams
- Provide a platform whereby CoP leads can understand our approach to the new Code, and an understanding of how it is being used / interpreted within CoLP.
- Showcase the CoP to our officers / staff and the support that they can provide

Our Communications team have worked with ICOD on this event and will be producing both internal and outward facing messaging.

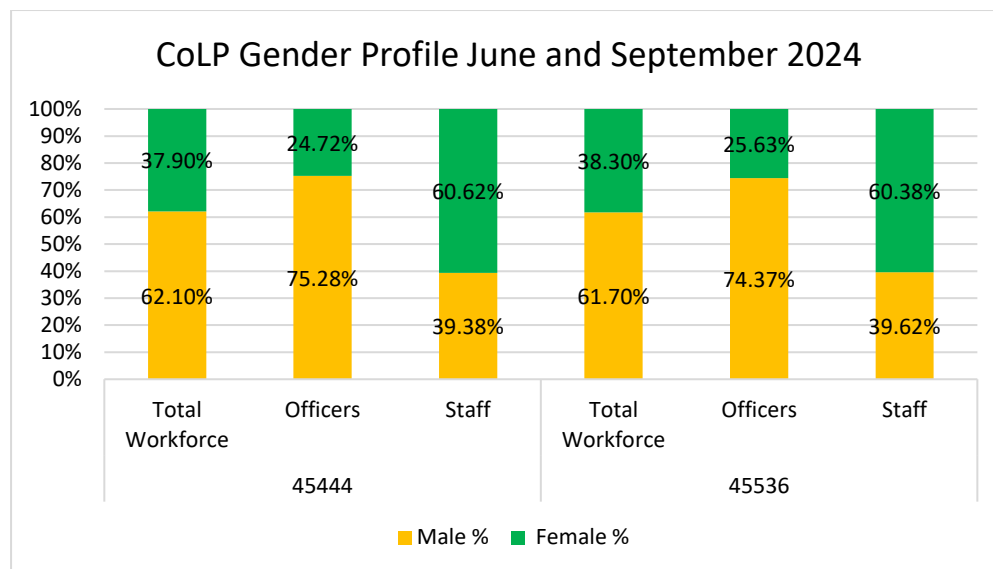
2. People data internal review

Officer gender

Officer female profile has increased by 0.9% with 25.6% female of 999 total officer headcount, compared to 24.7% of 999 headcount in June 2024. Of the 24 officers who joined the force as at September 2024, 45% of them were female.

Staff gender

Staff gender has remained similar to the last reporting period, with the female profile at the end of September at 60.4% of 573 total Staff headcount (decreased from 579 headcount).



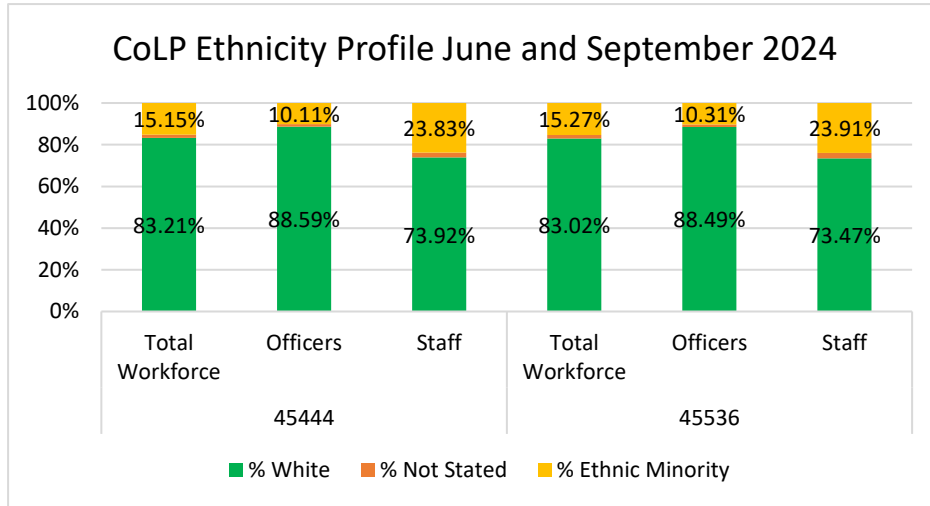
Officer ethnicity

There has been a slight increase from the last reporting period (June 2024) with 10.31% of officers identifying as being from an ethnic minority background in September 2024 compared to 10.11% of officers identifying as from an ethnic minority background (headcount 999). Of the 24 officers that joined the force this quarter, 8% identified as being from an ethnic minority background.

Staff ethnicity

The number of ethnic minority staff has increased by 0.1% since the last reporting period to 23.9%. Staff total headcount is 573 (previously, 23.8% of 579 headcount).

Our



total

workforce, Officers and Staff, has a headcount of 1572. 38.3% are female (increase from 37.9% in June 2024) and 15.3% identify as from an ethnic minority background (increase from 15.1% in June 2024).

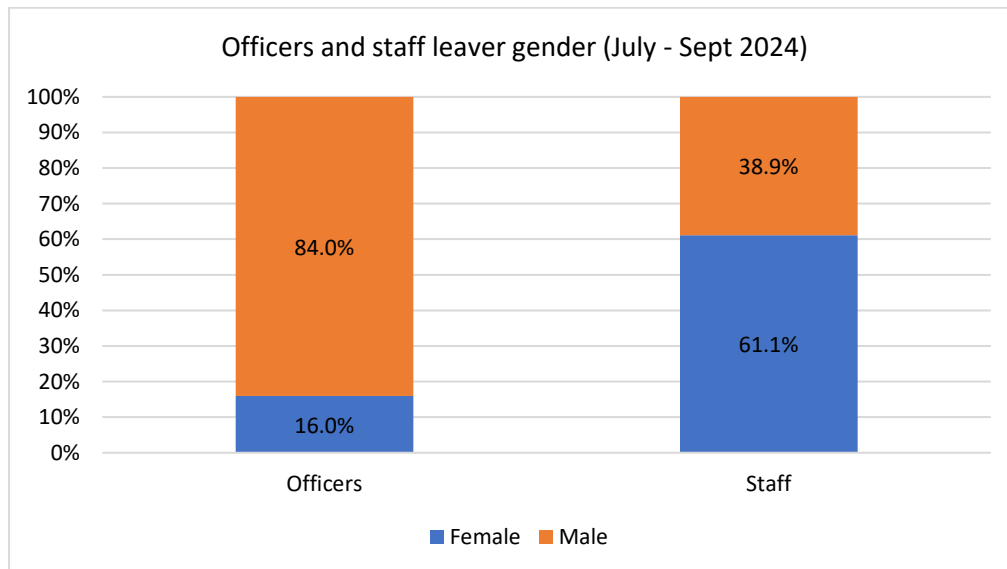
Leavers

Officers

Of the 25 officers that left the workforce, 16% were female. 4% of the 25 officers who left identified as being from an ethnic minority background.

Staff

18 staff left the workforce with 61.1% of them being female. 16.7% of the 18 who left stated they were of an ethnic minority background.



Leavers: Officers

During the period (July-September 2024), 25 Police Officers left the force, this equates to a 2.5% leaver rate. Across April-September 2024, 44 officers left the force, a 4.4% leaver rate. Compared to Q1-2 of 2023/24, where 55 Officers left the force (5.5% leaver rate), the number of leavers has reduced in 2024/25 and is likely to be a lower leaver rate overall than 2023/24. Reasons for leaving are provided in the table below, the main reason for leaving in Q1-2 2024/25 was retirement.

Of the 44 Police Officers that left the force, the majority left from Local Policing (14) and National Lead Force (13 - half of which are related to change in regional ROCU personnel). 2 officer left during their probation; the majority left from within the constable rank. Excluding ROCUs, the average length of service for officer leavers was 17 years.

Police Officers– Reasons for Leaving (per Financial Year)

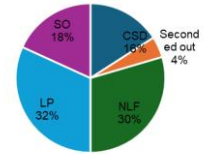
| | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 Q1-2 |
|----------------------------|-----------|-----------|-----------|-----------|-----------|------------|------------|--------------|
| Other | 0 | 0 | 0 | 1 | 0 | 1 | 1 | 0 |
| Dismissed | 1 | 1 | 0 | 0 | 0 | 1 | 1 | 1 |
| End of Contract/Secondment | 1 | 0 | 0 | 4 | 1 | 11 | 8 | 6 |
| Medical Retirement | 2 | 0 | 2 | 1 | 0 | 2 | 1 | 2 |
| Retirement | 35 | 37 | 31 | 29 | 42 | 43 | 31 | 16 |
| Transfer | 9 | 17 | 22 | 14 | 26 | 20 | 24 | 6 |
| Resignation | 26 | 7 | 22 | 21 | 27 | 34 | 41 | 13 |
| Total | 74 | 62 | 77 | 70 | 96 | 112 | 107 | 44 |

The Retention and Exiting Working Group continues to review the exiting data to better understand why people are leaving to develop retention strategies. In April 2024, the exit survey was updated to use questions from a national leaver's framework. From the exit surveys for both Officers and Staff (April 2024– September 2024), personal and professional development and training was the main contributing factor for people leaving. There were positive scores for enthusiasm for the job, satisfaction with pay and benefits, and being treated fairly. Areas to work on included wellbeing, worklife balance, workload, and training and development.

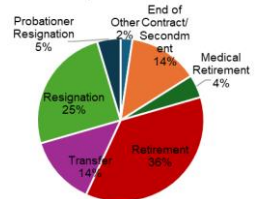


A local service with a national role, trusted by our communities to deliver policing with professionalism, integrity and

Officer Leavers by Directorate Q1-2 2024/25



Officer Reasons for Leaving Q1-2 2024/25



3. Key issues, risks, and mitigations

Staff Networks and Associations (SNAs)

Under our new EDI governance structure and supporting strategy, we are taking forward recommendations made as part of a review of our networks and associations. In parallel, we have asked our 13 SNAs to complete a quarterly update detailing their 3 key achievements since the previous reporting period, their 3 key challenges/risks and the 3 key areas where they need support or decision.

To provide a 'taster' of these issues, a combined pack of responses can be found at Appendix B. A key theme is that some SNA members do not feel supported by supervisors to conduct SNA activities. We continue to review dedicated time allowance and will be submitting recommendations to the Chief Officer Team.

Resourcing and Demand

Since the last reporting period, ICOD has confirmed that a new Chief Inspector will be joining the team mid-November, it is anticipated that this additional resource will be able to bolster progress in some areas, including EDI Strategy Implementation and Youth IASG (Independent Advisory Scrutiny Group). ICOD remains a small team with a significant portfolio, it is impacted considerably by any sickness or abstraction. We are adhering to our recruitment plan for our new Grade E Organisational Development (OD) Practitioner, who will be able to take the lead on our future Staff Survey, Leadership Training and Evaluation.

A new PC Staff Officer has also recently been recruited for our Head of Professionalism and Trust, we aim to recruit into our 4th PC vacancy at the end of this year; it is worth noting that our current 2 PCs are currently largely involved in

training delivery. The remainder of ICOD (Supt and 1 x Grade E) are focused on delivery of the Inclusivity Programme, internal EDI governance and business planning,

4. Forward look

Staff Survey and Cultural Audit

The Autumn 2024 pulse survey launched on 15th September 2024 and closed on 2nd October 2024. The survey was open to the total workforce to complete, with the exception of contractors. The pulse survey measured engagement and culture. Each department within Force is provided with a bespoke report relevant to their area(s) of responsibility.

The results showed a completion rate of 51%, a fall of 6% since the last full staff survey in January 2024. The June 2023 “Pulse” Survey had a completion rate of 56%. The engagement score (consisting of question sets designed to analyse the level of enthusiasm and dedication that the workforce feels towards the organisation), has remained at 71%.

For the first time, a question set relating to culture and behaviour has been added, creating the new culture key performance indicator. This will continue through to the last cycle of surveys for the three years. The culture and behaviour questions have been added in order to prioritise teams that will benefit from participating in the cultural audit. The next full staff survey will take place in March 2025.

The cultural audit pilot is underway, with two further teams participating over the coming six weeks. Findings will be reported to the Police Authority Board in the new year.

A full report regarding the Pulse Survey will be presented to members of PAB and SPCC, this provides a high level summary of outcomes.

White Ribbon Week

This takes place at the week commencing 25th November 2024, and we have a number of activities planned to coincide, including a ‘focus on’ victim-blaming language (which will be delivered by 2 colleagues from the IOPC) on Tuesday 26th November; and also a face to face session to be delivered by a Chief Supt on an investigation into a violent sexual assault, this will be heard on Friday 29th November.

Alongside this, we continue to work on our own action plan, with strands around creating safer spaces and relentless pursuit, alongside improving internal trust and confidence.

Inclusivity Standard

Since the last reporting period, we have met with representatives from Inclusive Employers to received our feedback on our 'Silver' award.

This included highlighting our areas of strength along with our areas for improvement. We have invited the team to attend a future session with Senior Leaders to explain more of the detail and what is required collectively form us a force to work towards the higher award. However, we are informed it is unlikely we will achieve a 'Gold' standard for an additional 2 years at the very minimum due to the work required to attain the highest award.

Slides at Appendix C provide a breakdown which may be of interest to members. Next steps in relation to this piece include incorporating actions into our EDI governance framework, avoiding duplication, to ensure that progress is effectively monitored.

Appendix A- Inclusivity Programme Sessions (Evaluation slides follow)

| Date | Title | Content |
|----------------------------|---|--|
| 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. |
| 25 th 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. |
| 26 th September | 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. |
| 22nd October | Focus on... Managing Colleagues with Health Conditions, Neurodiversity and Disability | Many line managers don't have experience managing people with a health condition, neurodiversity or disability and it is important to know what is fair or reasonable when agreeing things like adjustments. This Focus on... session has been put together to help managers understand, and simplify issues around, managing colleagues who have different needs. |
| Various | Ongoing inputs throughout the Summer-Mentivity (impact of police use of force on black communities), Active Bystander, Ethical Dilemmas. | |

Focus on



Focus – On LGBTQ+ sexual orientation
Sam Phillips – Inclusive Employers

100% stated they would recommend this module to others

Why did you sign up?

- 'I was interested to hear about other perspectives and learn more about the topic'.*
- 'I wanted to learn more about the LGBT experience and how best to support LGBT colleagues'.*
- 'I have friends in the community, I am always willing to learn and update myself on new terms'.*
- 'Keen to learn about the different orientations and fearful of getting it wrong so looking for advice'.*
- 'To educate myself on the LGBTQ+ community'.*
- 'Interested in learning more about it'.*
- 'To learn more about LGBTQ+ and complete one of my mandatory inclusivity programmes'.*
- 'To enhance existing knowledge and hear another point of view'.*
- 'To have an insight and gain more knowledge about LGBTQ+ history and community'.*
- 'Because I am keen to learn firsthand about how to best support difference'.*
- 'More understanding of terms used; I have young adults in my life that have come out or are transitioning and I want to be as supportive as possible'.*

What did you learn


- 'I am more aware of terminology and how incorrect usage may impact on someone else'.*
- 'Be more aware of my language use'.*
- 'I learnt about the history and some more key figures in LGBTQ+ History. I'll be doing more research and open conversations with friends and family'.*
- 'I learned it's okay to get it wrong, apologise and moved forward. Great ethos!'*
- 'I learnt that Gay meant "Good As You". It was interesting as to the number of flags there are, and what they represent'.*
- 'A more informed understanding of some of the newer sexualities that come under the LGBTQ+ umbrella'.*
- 'I learnt more about visibility, and it was really nice to hear a guest speaker with policing experience'.*
- 'I learned about a couple of different sexualities under the LGBTQ+ banner which was really interesting'.*
- 'Learning/understanding that you should refer to people how they wish to identify and its Ok to ask, which I can use in the workplace'.*
- 'The myriad of terms and identification and the pathways of how and why for them. It will help me be cognisant and more considerate'.*



We continue to have a calendar of Focus On throughout the year

Focus on

Focus On – Rebecca Roots' Journey as a Trans person
100% stated they would recommend this module to others




Why did you sign up?

- 'I was interested to learn more about Rebecca's journey'*
- 'To learn more about Trans peoples journey and improve my awareness'*
- 'Interested to understand what it must be like to go through this journey'*
- 'Because I wanted to learn more about how I can support the Trans community'*
- 'To understand the perspective and experience of someone from the trans community'*
- 'I do not have direct contact (that I am aware of) with any trans people, so I was very interested to listen and learn from Rebecca's story'*
- 'Transgender issues are something I do not know much about and I wanted to learn more'*
- 'Gain knowledge and understanding'*
- 'My understanding of the trans community is limited. I wanted to learn and understand.'*
- 'To find out more about trans people'*
- 'Requirement to attend events for PDR'*
- 'To learn more about 'Trans Person' and hopefully try and understand the different stages of their life, what is happening and what they go through.'*
- 'I work closely with a TransWoman and wanted a better understanding'*
- 'To widen my knowledge in this area and understand it from someone's lived experience'*


What did you learn

- 'A deeper understanding of the transgender community and perhaps being less afraid to ask questions.'*
- 'I will continue to listen and engage with people no matter their personal characteristics. We are all different and have had unique experiences which everyone can learn from.'*
- 'I learnt - Accept, Listen, Learn and Yes – ALLY'*
- 'To broaden my consideration to the difficulties faced by people who have a different life experience to my own'*
- 'To be more aware and be more supportive; I had a friend (sadly passed) who lived a double life and I am grateful that they could be open, honest and be their true self with me.'*
- 'I learned about the struggles of a trans woman, some issues I had not considered before'*
- 'How transgender people feel and what they have to face or had to face in the past'*

We continue to have a calendar of Focus On throughout the year



Focus on




Focus on... VAWG in the City

100% stated they would recommend this module to others:


What did you learn and how will you use the learning?

- 'Up to date info on Violence towards women and pleased something is being done in a positive and coordinated way'*
- 'Where to go and what to do in cases where you see/hear or aware of appropriate incident'*
- 'Understand that there is as much in what isn't said as what is said'*
- 'The overarching plans to tackle VAWG is important as a force'*
- 'To be more vigilant and aware of your surroundings'*
- 'Current actions and approach towards VAWG across the city and how to work within that framework'*
- 'It was interesting to find out more on the current work ongoing in this area and what we might be asked in terms of VAWG data and analysis'*
- 'The sobering extent of the issue'*
- 'I saw from all speakers; that VAWG isn't going away, a much greater effort needs to be made collectively across all the nations'*
- 'All the different types of Sexual Assault/Abuse, I feel I have a much better understanding of the topic.'*
- 'Legislative changes'*
- 'I can embed the learning of what the city and its partners do into my training sessions'*
- 'A reminder of what White Ribbon's purpose is was useful for me to share in discussions in future'*
- 'New legislation and Safer Spaces app was useful to hear about and hopefully we can take that into the community for their awareness'*
- 'That policing (and hopefully society as a whole) is finally taking VAWG seriously. To raise awareness amongst colleagues/friends of the good work being done'*
- 'I learnt a lot about the focus of VAWG and how this is working together with the City to make a safe space and I will impart this on to others'*
- 'I hadn't been previously aware of the new legislation being brought in, I am interested to see it being applied by CoLP'*
- 'Didn't know about the safe spaces and I work for CoLP - This means there will be a lot of other women out there that have no knowledge'*
- 'The amount of work going on behind the scenes to keep women safe - advice to officers'*
- 'The safe spaces was something new and very helpful'*

We continue to have a calendar of Focus On throughout the year



Active Bystander



Active Bystander Training


100% stated they would recommend this module to others

Why did you sign up

- *'Interest into the subject'.*
- *'Wanted to know how COLP intends to utilise this to influence change in culture'.*
- *'For awareness, to highlight any issues in my work environment'.*
- *'Really essential input and should be mandatory for all in my opinion, especially to those officers who think it doesn't apply to them'.*


What did you learn?

- *'Reminder on how to act and behave'.*
- *'The importance of doing the right thing and calling out bad behaviour'.*
- *'How to listen out and potentially to challenge behaviour'.*
- *'To advise others to raise issues and to stand up for others'.*
- *'Case studies and options'.*
- *'Think about what others say and act'.*



Sessions continue to be booked for 2024/25. We will continue to deliver it as part of the Student Officer programme.

Ethical Dilemmas



Ethical Dilemmas
As part of the continued delivery of Ethical Dilemmas linked to the Code of Ethics, we delivered sessions to the force wide during July – September 24.


100% stated they would recommend this module to others

Why did you sign up?

- *'Interested in the subject'.*
- *'Hear other's thoughts on how to approach ethical dilemmas'.*
- *'I have heard good things about it'.*
- *'Something a bit different, interactive and was interested to see how it could be delivered and how attendees would interact'.*
- *'Interested to see how it can help in my role'.*
- *'Had feedback from colleagues that it is a good programme'.*
- *'Opportunity to understand latest thinking on decision making'.*
- *'To support my growth as a manager, able to give more support to my team'.*

What did you learn?

- *'Never make assumptions and always question what you see and hear'.*
- *'Will learn to listen and apply accordingly to avoid language barrier'.*
- *'To take a step back from my own assumptions / perspective and take a more considerate approach'.*
- *'Will reassess how to deal with people during meetings'.*
- *'To pursue and reflect, consider others' views before making a decision'.*
- *'Learned about ladder of inference, I will collect more information before making my decision'.*
- *'The 5 steps of listening – will use more one to one, either chair or receive'.*
- *'Talk to people. Don't be afraid to talk solutions through and explore solutions'.*
- *'Tools to aid decision making, listening tool'.*



Future sessions for Middle Managers are arranged for 2024/25 from July 24

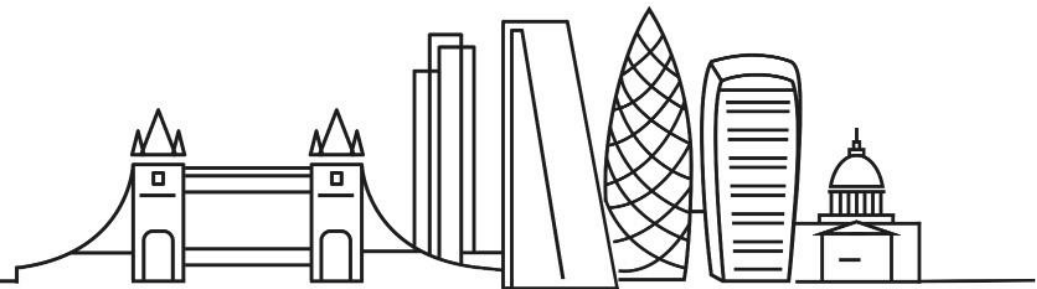
We will also be incorporating into future Leadership programmes



Appendix 1
To be presented at PSIC, 25th November
(Previously presented to EDI Strategic Board, 12th November)

Page 119

(Nil return alphabetically - Armed Forces, AMP, GEN, LGBTQ+,
Menopause Action, Parenting Support, Polish Network, Staff Network).



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

1) Key Achievements since last meeting

NETWORK OF WOMEN

1. Creation of new tactical plan
2. New Chair and events execs
Brogan Hawkins replaces Lauren Coward as cochair
3. Input on Army's approach to leadership

WELL-BEING NETWORK

1. Walking City tours
2. More PTIs trained
3. Garden club supported and active

CHRISTIAN POLICE ASSOCIATION

1. Attendance at annual general meeting
2. Team feels supported in spirit and love, where they can pray for one another / colleagues
3. Grateful for funding which encourages team bonding / learning

GYPSY ROMA TRAVELLER NETWORK

1. Liaison with National equivalent (GRTPA)

DISABILITY ENABLING NETWORK

- 1) 100 members in DEN but that is indicative of issues on the rise.
- 2) People across business using DEN accessibility event checklist
- 3) Hybrid meetings more common but way manage people online needs to improve.

BLACK POLICE ASSOCIATION

- 1) Sponsorship Programme support work
- 2) Employee Relations with a specific funded unit
- 3) Consulting with LP on local implementation of PRAP

2) Key Challenges & Risks

NETWORK OF WOMEN

- 1) Pensions- especially for those who worked PT or took extended Maternity leave
- 2) Need to gain more officers members who are young in service

WELL-BEING NETWORK

- 1) Lack of attendance at the last meet
- 2) Ownership / Crossover with TDW corporate plan meaning people are confused as to the network function.
- 3) Time to complete network work

CHRISTIAN POLICE ASSOCIATION

- 1) Supervisors to be more supportive on CPA matters or SNA duties
- 2) Where feasible LM/Supervisors prioritise staff morale in order to get the best of their teams

GYPSY ROMA TRAVELLER NETWORK

- 1) Limited direction from GRTPA - however, now reinvigorating themselves
- 2) The National GRTPA are asking that force GRT Networks merge into areas ie CoLP, MET and BTP networks will become one region. Impact hopefully positive - more members

DISABILITY ENABLING NETWORK

- 1) Resourcing- Little movement on BDF action plan
2. Adjustment passport- members reporting not user-friendly, different versions CoLP v's COLC
3. Resistance to commitment re reas. adjustment, people left in limbo / nowhere to report
4. Workplace attendance policy

BLACK POLICE ASSOCIATION

- 1) Lack of protected/dedicated time
- 2) Lack of understanding re importance of equity
- 3) Attendance of BPA at EDI events during worktime. Some supervisors/managers lack of education of entitlements of members and staff.

3) Key Decisions / Support Required

NETWORK OF WOMEN

- 1) Merchandise and banners required for network
- 2) Timetable of promotion processes would be helpful
- 3) Assistance with demographic data from HR

WELL-BEING NETWORK

- 1) Our three priorities for next year
- 2) Recruitment of secretary

CHRISTIAN POLICE ASSOCIATION

- 1) To have outlined SNA hours and to be agreed with LMs and circulated
- 2) For continual training on new supervisors/LMs to be trained on how to line manage staff

GYPSY ROMA TRAVELLER NETWORK

- 1. We do not yet have a champion assigned to our network - what is the process for this and would it be possible?

DISABILITY ENABLING NETWORK

- 1. Line Manager training/resources/meeting/CityNet and plan
- 2. Urgency & resource given to ownership of BDF action plan
- 3) Ownership taken to drive– not lean on networks to raise / fix.

BLACK POLICE ASSOCIATION

- 1) Completed Network SOP to be published
- 2) Protected Time to be agreed upon by organisation
- 3) A review of the PRAP communications strategy

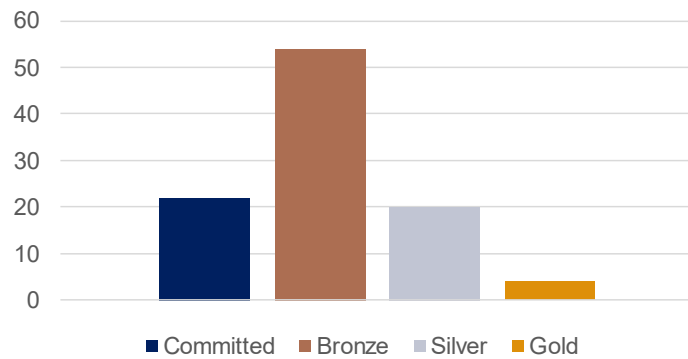
Inclusive Employers Standard, 2024

Executive summary Review carried out in October 2024



| Pillar | Our Score (%) | Industry Average (%) | Gold Submission Average (%) |
|----------|---------------|----------------------|-----------------------------|
| Engage | 67% | 56% | 94% |
| Equip | 33% | 42% | 87% |
| Empower | 56% | 42% | 87% |
| Embed | 48% | 40% | 81% |
| Evaluate | 44% | 42% | 81% |
| Evolve | 56% | 35% | 95% |

Submissions by Level



Where is CoLP today on the IES Standard?

| Pillars | Areas of Strength today | Areas of opportunity |
|-----------------|---|---|
| Engage | Internal communication Staff Consultation | Diversity data collection and disclosure rates |
| Equip | All staff training | Policies Management training SLT/Board specific training and development Guidance and support across the employee lifecycle |
| Empower | Staff empowerment Day to day staff recognition | Impact measurement of events and campaigns Role models and champions |
| Embed | Corporate values Strategic direction Performance management Recruitment EqIAs | Devolving strategic responsibility to departmental level Expanding on pay gap measurement Impact measurement of current recruitment and career development pathways by characteristic |
| Evaluate | Data reporting | Action focused goals Closing the feedback loop Return on investment |
| Evolve | Innovative knowledge sharing Industry role modelling | Strategic direction for networking and knowledge sharing Impact measurement of actions |

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| | |
|---|---|
| Committee(s): Strategic Planning & Performance Committee Police Authority Board | Dated: 3 rd December 2024 4 th December 2024 |
| Subject: Policing Plan 2025-28 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 | For Discussion |
| Report author: Emma Cunnington, Head of Strategy & Planning | |

Summary

This report provides an update on the development of the new Policing Plan 2025-28 following the last update to Strategic Performance and Planning Committee (SPPC) in September 2024 and Police Authority Board in October 2024. It also follows and takes on board the feedback from an informal Member workshop, which took place on 7 October 2024.

The report covers how the development of the plan is meeting the previously-agreed principles:

- a) Improved engagement and co-production
- b) Evidence-based and data-driven approach
- c) Working together

At paragraphs 12 and 13, the report presents suggestions for the new operational and organisational priorities, with prioritised commitments underpinning these.

The report also outlines a proposed approach to improving the transparency of performance monitoring and reporting on progress against new priorities (in the short, medium and longer term), an update on how the design of the new Policing Plan will be approached, and details of how City of London Police strategies and governance arrangements will demonstrate strategic alignment with the next Policing Plan.

Recommendation(s)

It is recommended that Members:

- Note the report,

- Provide any further feedback on the proposed new operational and organisational priorities of the new Policing Plan 2025-28 (see paragraphs 12 and 13 in this report), and
- Note that the final draft of the Policing Plan will be presented to the Police Authority Board on 12th February 2025 and then to Court of Common Council on 6th March 2025, in order for the final version to be published on 1st April 2025.

Main Report

Background

1. Members will recall that the Police Act 1996 requires the Court of Common Council to issue, before the beginning of each financial year, a policing plan (prepared by the Commissioner but owned and approved by the Court of Common Council) setting out:
 - a. The Common Council's objectives for the policing of the City of London police area, and for the discharge by the City of London Police of its national or international functions during that year; and
 - b. The proposed arrangements for the policing of that area for the period of three years beginning with that year.
2. The plan must have regard to the national Strategic Policing Requirement (SPR) issued under section 37A. Appendix 2 outlines how the next Policing Plan will align with the SPR.
3. As discussed at the last SPPC and at the Member workshop, the shared principles for developing the new Policing Plan 2025-28 are:
 - a. Improved engagement and co-production – comprehensive engagement is taking place with Members, City residents, City businesses and workers and national economic and cyber crime stakeholders as part of our consultation on the Plan, to ensure it is co-produced by the people we serve. It is important that the Plan is also influenced by our own people, to achieve collective ownership.
 - b. Evidence-based and data-driven approach – using findings from our Force Management Statement and similar work, we must design a plan based on what our demand and threat data analysis is telling us, to ensure our priorities are based on robust evidence as well as considering community priorities and national requirements.
 - c. Working together – City of London Police and the Police Authority team are collaborating on this process. In addition, the Community Safety team is using our public surveying (via Commonplace) to inform the next Safer City Partnership strategy.

4. A note of the Member Workshop on the Policing Plan circulated by the Chair can be found at Appendix 1.

Improved engagement and co-production

5. In the previous paper to SPPC and Police Authority Board, and in the slide deck presented to Members on 7th October, Members received an overview of existing engagement on the Policing Plan to date.
6. Since the last update, we have now launched Phase 2 of the consultation on the [online Commonplace platform](#) as well as engaging with a plethora of stakeholders across the City through different networks and events, including:
 - a. Corporation Multi-Faith Network (posted to Corporation intranet)
 - b. Christian Police Association (shared to all members and asked members of CPA to share further across their networks and places of worship)
 - c. Association of Muslim Police
 - d. City Belonging (sent in newsletter on 11/10/2024)
 - e. Chair of City Black Employee Resource Group (CBERG)
 - f. City of London Police (posted to CoLP intranet)
 - g. City of London Police social media (1st Nov – Twitter and LinkedIn, 8th Nov – Twitter, Facebook, Instagram, 12th Nov – Twitter and LinkedIn, 16th Nov – Twitter and Facebook, 20th Nov – Twitter and LinkedIn, 24th Nov – Twitter, Facebook, Instagram.
 - h. Lord Mayor’s Colloquy (Spoke with attendees about the consultation and urged them to complete it – 16/10/2024)
 - i. Hate Crime Community Engagement Stand at Leadenhall (17/10/2024 - Provided a QR code for individuals to scan to take them to public consultation)
 - j. City Question Time (had a QR code for individuals to scan, CoLP also had a stand to interact with attendees which consisted mostly of residents – 22/10/2024)
 - k. Cluster Meetings
 - l. City Economic Crime Briefing
7. A verbal update on the findings of Phase 2 of the consultation will be provided at the meeting.

Evidence-based and data-driven approach

8. Proposals for the new Policing Plan 2025-28 priorities have been informed by the report presented to Members considered at its meeting on 4 September 2024 which provided an overview of City of London Police’s strategic demand assessment. This product was informed by the latest Force Management Statement and recent business planning findings based on understanding current and forecasted demand.
9. In summary, the report found that:

- a. Despite increasing demand to date, a very good service continues to be provided to communities with response times consistently outperforming the nationally set levels and a 21% positive outcome rate which is one of the highest in the country.
 - b. Theft continues to make up the majority of crime volumes in the City and there is a proven link between footfall in the City and crime. External factors within the City of London over the next 4 years, including increases in student and residential accommodation and leisure facilities, will change the crime and incident demand profile for City of London Police, in particular:
 - Violent and sexual offences linked to licenses premises
 - Theft offences linked to retail and hospitality venues
 - Domestic abuse linked to residential venues
 - Possible increases in anti-social behaviour by a younger population demographic
 - c. Demand associated with mental health incidents has significantly increased and this trend is forecast to continue.
 - d. The size of the workforce is expected to increase following the Labour manifesto commitment to uplift police numbers and a planned uplift in national economic crime capabilities over the next 2 years. This will create additional demand on enabling services and estates.
 - e. New technologies including automation and artificial intelligence are being implemented to increase productivity in investigations, crime analysis, data analysis and reporting, as well as CCTV analytics to improve detection and prevention of crime.
 - f. The future police estates programme provides opportunity to improve productivity in a number of areas through new purpose-built facilities and deployment of improved technology.
 - g. HMICFRS have noted significant improvement in the force's understanding of demand and capabilities and its business planning over the past 2 years. Further improvements could be made through greater use of Corporation data and more explicit reference to performance indicators within its force management statement.
10. The proposed strategic priorities of the new Policing Plan have been informed by the Strategic Policing Requirement which sets out the Home Secretary's view of what the current national threats are, and the national policing capabilities needed to counter those threats. The seven threats are Violence Against Women and Girls, Terrorism, Serious and Organised Crime (SOC), National Cyber Incident, Child Sexual Abuse, Public Disorder and Civil Emergencies.
11. The City of London Police has undertaken a multi-stage approach to confirm that we are meeting the capabilities set out in the SPR. The approach includes desktop review, alignment to HMICFRS recommendations, reality testing, linking in with the Force Management Statement, and threat area status rating.

Working together to draft new priorities

12. Working with the Police Authority Team, and following the feedback from the community (including Members) and bearing in mind our evidence-based demand assessment, the City of London Police have suggested the following operational priorities and commitments:

- *Keep people in the City safe and feeling safe*
 - Deliver safe City streets by preventing and reducing crime and anti-social behaviour
 - Protect the City from terrorism
 - Tackle what matters most to our communities, such as acquisitive crime (including theft, robbery and burglary) and violence in all its forms (including violence against women and girls)

- *Put supporting and safeguarding victims and vulnerable people at the heart of everything we do*
 - Improve the information we provide to – and way we communicate with – victims
 - Provide victims with professional support and advice throughout their CJS journey
 - Improve positive outcomes for all victims
 - Safeguard vulnerable people

- *Improve the policing response to economic and cyber crime*
 - Deliver safe virtual streets by protecting people and businesses
 - Proactively pursue offenders
 - Protect people and businesses from the threat of fraud, economic and cyber crime.

13. In addition, we have also considered feedback from our own staff via an internal Commonplace survey, the force's Staff Survey results and demand captured as part of the business planning process. Using this information, the following organisational priorities are suggested:

- *Be one of the most inclusive and trusted police services in the country*

Here at the City of London Police, we want to become one of the most inclusive and trusted police services in line with objectives as part of our EDI strategy (our people, our policies, our public, our partners):

 - Prioritise our *people* to increase diverse representation, improve our standards and ethics, drive inclusive leadership and individual accountability, create an equitable working culture and deliver zero tolerance of any behaviours that compromise this
 - Strengthen our *policies and processes*, to ensure they are equitable, accessible, inclusive and informed by the diverse representation of our police service and independent scrutiny and key decision-making bodies.

- Collaborate with our *public* to build and sustain authentic engagement and relationships with all communities, to ensure their confidence in our policing and improve our standards in response to crime
- Working with *partners* to lead by example by building inclusive relationships with professionals to provide enhanced services for our communities, foster innovative collaboration and establish partnerships that empower our service to deliver our EDI commitments
- *Be an employer of choice*
 - We will attract and recruit the best into the organisation
 - We will develop and retain our people
 - Deliver on the five themes set out in the City of London Corporation's [People Strategy](#) (my contribution, my reward (Ambition 25), my wellbeing and belonging, trustworthy leadership, my talent and development, building brilliant basics)
- *Achieve organisational and commercial proficiency*
 - Become a data-driven and learning organisation that continually improves its effectiveness, efficiency and legitimacy
 - Mature our approach to understanding of demand, capability and cost to plan effectively for the future
 - Deliver a productivity strategy, including the use of AI and automation, to enable efficient processes and better public outcomes.

Performance monitoring

14. Work is underway to define key performance indicators associated with each of the proposed strategic priorities and commitments listed above.
15. Beyond 2025, it is recommended that the Police Authority (and therefore the City of London Police) improve the transparency of how the City of London Police is performing against Policing Plan priorities and commitments. In the short term, we propose publishing the performance packs (currently submitted to SPPC on a quarterly basis) on the City of London Police's website.
16. In the medium term - aligned with publication of the next Plan (to ensure consistent branding) - we propose publishing a more 'bitesize' performance update on CoLP activity in response to Policing Plan priorities.
17. In the longer term, the City of London Police aims to publish data dashboards on the website (akin to the [London Data Store](#)).

Look and feel of the new Policing Plan

18. Work is underway to consider third-party support in designing the look and feel of the new Policing Plan (and performance updates). The new plan should be shorter in length, and more digestible and accessible, potentially with the option of interactive functionality when read online.

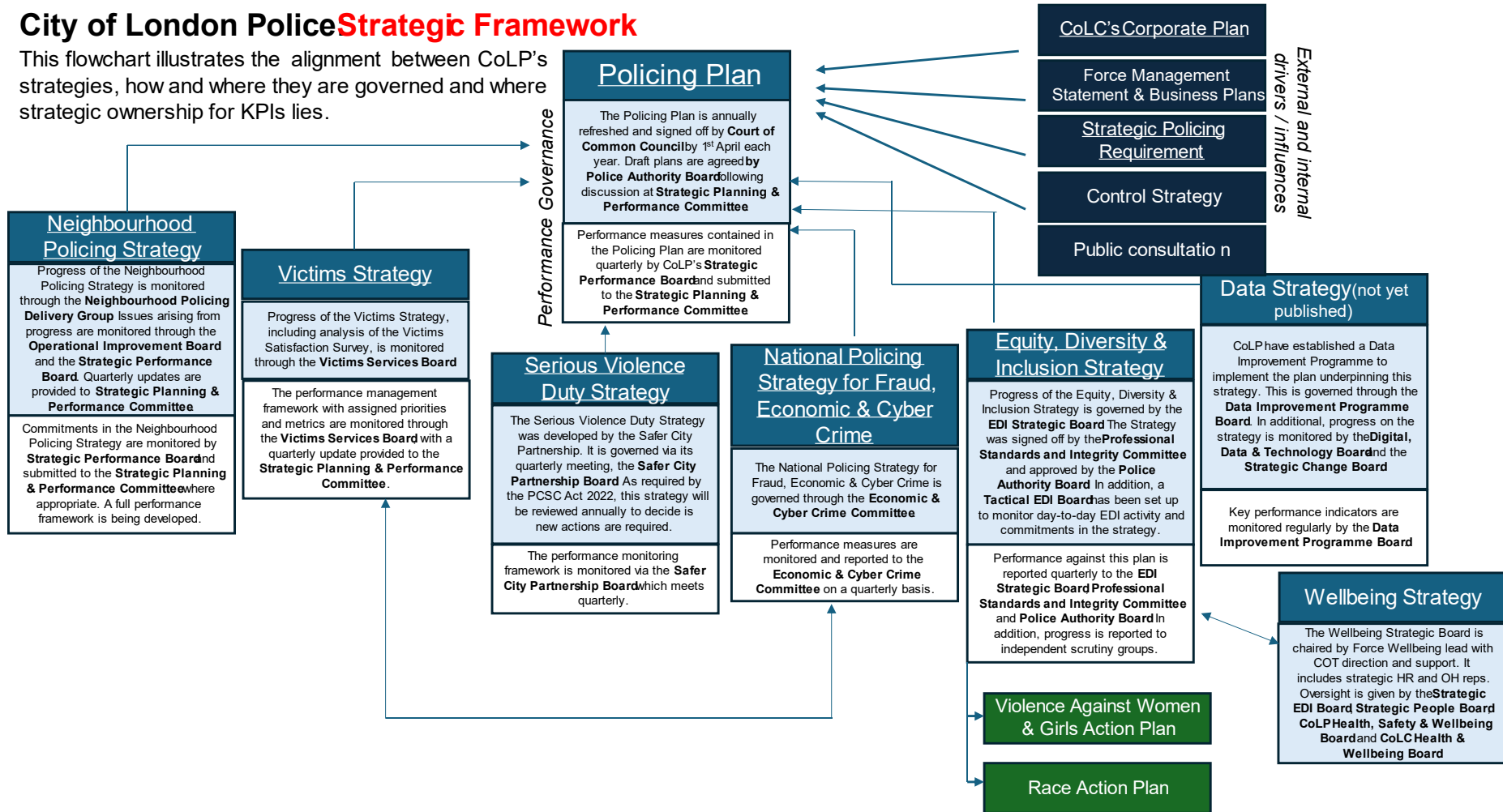
19. To professionalise this work, the Police Authority Team will run a procurement exercise to procure a supplier to help design this as a new product. The contract will also include a requirement to support in the design of the performance update on CoLP activity (draft content provided at Appendix 3) and other comms and engagement work.

Wider strategic context

20. The new Policing Plan will set the strategic direction for City of London Police over the next three years. The flowchart below illustrates how City of London Police's wider strategies and plans, and strategic governance and performance management arrangements, are – and will continue to be – closely aligned with the Policing Plan.

City of London Police Strategic Framework

This flowchart illustrates the alignment between CoLP's strategies, how and where they are governed and where strategic ownership for KPIs lies.



Conclusion

21. This report summarises the approach and proposed strategic priorities of the City of London Police's Policing Plan for 2025-28.

Background papers

- *2024 Force Management Statement - Strategic Demand Assessment* – Report of the Commissioner presented to the Police Authority Board on 4 September 2024.
- *Policing Plan 2025-28 Update* – Report of the Commissioner presented to the Strategic Planning & Performance Committee on 26 September 2024 and the Police Authority Board on 3 October 2024

Appendices

- Appendix 1: Note of the Member Workshop on 7 October 2024 sent to PAB Members on 15 October 2024.
- Appendix 2: Strategic Policing Requirements (SPR): How is the new Policing Plan meeting these?

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Appendix 1

To all Police Authority Board Members – Policing Plan Consultation – next steps

(email sent on 15 October 2024)

Dear colleagues,

On Monday 7th October, City Police presented a Member briefing on the development of the next City of London Policing Plan. I am very grateful to Dawn Oliver, Helen Fentiman, and Madush Gupta for joining and contributing to the discussion on priorities for the next Plan. I've summarised the points raised below.

I am keen that we (the Police Authority Board) provide comprehensive input at this stage, given tight timescales (detailed below) to publication. As such, **can I ask Members to review the attached slides from Monday's session and provide comments to me by next Monday, 14th October.** I will then draft and share a letter from the Board to the City of London Police Commissioner, more formally setting out our provisional priorities for the next Plan.

In terms of next steps:

- City Police are currently consulting City communities on priorities for the next Plan. **Stage II of the consultation is now live ([here](#)) and I would be grateful if Members could share this as widely as possible with their City networks.**
- Under legislation, City Police are responsible for drafting the Policing Plan but its priorities are ultimately determined by the Police Authority Board, under delegated authority from the Court of Common Council. As above, I plan to write shortly setting out our provisional view of what these should be.
- An initial draft will be submitted to SPPC in late November and PAB in early December. Final clearance will be by PAB in February 2025, CoCo in March, and launch in April.

Yours,

Tijs Broeke

Summary of points from 1st member briefing on Policing Plan

- Consultation and co-production – it is important that City Police maximise public engagement with consultation exercises, including City business and worker communities. City Police agreed to host public events on the draft plan and emerging priorities as part of guaranteeing genuine co-production of content.
- Measurement and impact – the Plan needs a strong measurement framework for outputs and outcomes, and clear articulation of real-world impacts and change it will deliver for people in the City.
- Corporation elements – it is important that the Plan captures and reflects wider Corporation work and services – e.g. the role of licensing and community safety, and impacts on policing of projects like Destination City. It

was suggested the City Police present to the Crime and Disorder Scrutiny Committee.

Appendix 2

Strategic Policing Requirements (SPR)

How is the new Policing Plan meeting these?

Introduction

The Strategic Policing Requirement (SPR) sets out the Home Secretary's view of what the current national threats are, and the national policing capabilities needed to counter those threats. The seven threats are Violence Against Women and Girls, Terrorism, Serious and Organised Crime (SOC), National Cyber Incident, Child Sexual Abuse, Public Disorder and Civil Emergencies.

The City of London Police (CoLP) has undertaken a multi-stage approach to confirm that we are meeting the capabilities set out in the SPR. The approach includes desktop review, alignment to HMICFRS recommendations, reality testing, linking in with the Force Management Statement, and threat area status rating.

Violence Against Women and Girls:

- We have focused on key initiatives such as the monthly partnership Operation Reframe aims to build trust and confidence, relentless perpetrator pursuit, and creating safer spaces, by 'reframing the night' through our work with bars, pubs, and other licensed premises across the City.
- Operational aim – *'Keep those who live, work, and visit the City safe and feeling safe'*

Terrorism:

- We have continued to deploy operations such as Project Servator to protect the City from terrorism.
- We have carried out crime prevention stalls across the City to inform communities how to spot, prevent, and decrease the likelihood of being a victim of crime.
- Our consultation has revealed that Terrorism is the utmost priority of our community, receiving 31% of votes, 11% more than second.

SOC:

- We continue to grow and develop our serious and organised crime capability and have taken a whole system approach across prevention, protection, pursue and prepare. The improvement in performance of SOC disruptions is significant with figures for 2023/24 outstripping previous years by some significant degree. We continue to focus on improving our understanding of threat and harm with a particular focus on drug markets, modern slavery and human trafficking, as well as fraud.
- Operational Aim – *'Protect the UK from the threat of fraud, economic and cyber crime'* - this is the first Aim, reiterating CoLP commitment to being NLF.

National Cyber Incident:

- Our Economic and Cyber Crime Academy (ECCA) continues to deliver a range of training courses to police, other law enforcement agencies and international partners, in partnership with the Foreign Commonwealth, Development Office (FCDO) and the National Crime Agency (NCA). We have made excellent progress in realigning our professional training pathway for fraud and economic crime investigators and have embedded over half of our enhanced training course materials within our core courses.
- Operational Aim – *‘Protect the UK from the threat of fraud, economic and cyber crime’* - this is the first Aim, reiterating CoLP commitment to cyber security.
- Organisational Aim – *‘Ensure data and technology are at the heart of our work’*.
- We are also developing an IT and Digital Technology Strategy.

Child Sexual Abuse:

- The creation of the vulnerability and child protection team under the new operating model in Public Protection Unit has given clear ownership of high harm investigations such as child sexual exploitation, alongside safeguarding coordination functions.

Public Disorder:

- Our new Neighbourhood Policing Strategy aims to prevent crime, disorder and anti-social behaviour, and highlights key initiatives and operations within that to ensure we are meeting the threat.
- We continue to build relationships with communities across the Square Mile, attending business events, and hosting both online and in-person Crime Prevention sessions. Recent webinars have focused on national unrest (and the work we are doing in the City) in the wake of the violence in Southport.
- Operational aim – *‘Keep those who live, work, and visit the City safe and feeling safe’*

Civil Emergencies:

- The response to civil emergencies is regularly tested in partnership with City of London Corporation and the wider London Resilience Forum. The greatest threats have not significantly changed: CoLP is not currently responding to any civil emergencies and therefore the demand remains the same:
 1. Understanding emerging threats and risks
 2. Testing and exercising to develop plans to respond to civil emergencies and ensure we are suitably prepared for possible incidents.

| | |
|---|---|
| Committee(s): Resource, Risks and Estates Committee (RREC) Police Authority Board (PAB) | Dates: 19/11/2024 04/12/2024 |
| Subject: Revenue and Capital Monitoring Update – Q2 2024/25 | 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 the City of London Police | Information |
| Report author: Chief Finance Officer & Deputy CFOs | |

Summary

1. This covering report and accompanying slide pack provides information and analysis at Quarter 2 (Q2) (April to September) on the City of London Police’s financial performance against the approved revenue and capital budgets for 2024/25 and forecast use of resources to the end of the financial year.

Revenue:

2. Whilst the forecast outturn at Q2 2024/25 is shown as a breakeven position, this masks a number of significant cost pressures and compensating mitigations which takes CoLP’s 2024/25 revenue budget to the limits of affordability. These cost pressures include the revised implementation plan for the Fraud & Cyber Crime Reporting & Analysis Service (FCCRAS) which has necessitated an extension of the existing Action Fraud/Know Fraud services at a cost of some £13.1m, a budget correction of £0.7m to core funded activities and other operational demand pressures estimated to be £1.6m. These latter operational pressures include increases the cost of the Command & Control agreement with the Metropolitan Police Service for emergency call handling, additional forensics/data storage costs, facilities management, vehicles and Administration of Justice, and overtime related to non-recoverable protests/event activities.
3. Although these cost pressures have been largely mitigated by £3.3m of net pay savings, the application of a specific Action Fraud reserve £0.8m, release of non-pay core underspends £0.5m and additional net Home Office grant funding of £10.6m; mainly for National Lead Force (NLF) activities in respect of a cost share arrangement for the Action Fraud/Know Fraud extension, including a separate £1.2m pay award grant, the 2024/25 revenue budget is now at its limit for absorbing any additional cost pressures.

4. It should also be noted that any further requirement to extend the Action Fraud contract will not be affordable in year without obtaining additional funding, such as by increasing the loan facility or drawing from the General Reserve. The forecast also assumes that the trajectory of staff recruitment continues to provide for an unplanned level of vacancies for the remainder of the current financial year (recognising that, as vacancies reduce, so will the headroom for absorbing new pressures).
5. Embedded within the Q2 forecast projected achievement of £10m of mitigations against a target of £7m, which will be critical to maintaining balanced finances. The positive variance of £3m being due to increased overhead cost recovery from funded activities. The £10m does not include the additional and unsustainable savings this year from the higher, unplanned level of staff vacancy.
6. In further support of the Q2 revenue monitoring position:
 - **Slide 13** provides a breakdown of overtime in Q2 by category, highlighting an indicative overspend of some £0.4m. However, it is expected that with recent policing events outside of the Q2 period this forecast overspend may increase. Measures continue to monitor overtime via the Force's Strategic Finance Board with business area controls also implemented to ensure the use of overtime is robustly managed.
 - **Slides 14-16** 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.
 - **Slides 17-19** give an overview of historic receipts from the Asset Recovery Incentivisation Scheme (ARIS), a forecast for 2024/25 to 2027/29 is being developed by the Asset Recovery Team and the Q3 forecast will be updated taking account of this work. The slides also provide details of £3.1m of approved revenue / capital projects funded via the Proceeds of Crime Act (POCA) reserve in 2024/25. A summary of the benefits and outcomes of the POCA funded initiatives will be provided at a future meeting of this Committee.
 - **Slide 20** provides an update on the Force's reserves position which shows a forecast reduction in earmarked reserves of £3.9m by the end of the current financial year. This comprises a drawdown from the Proceeds of Crime Act (POCA) reserve of £3.1m as noted above and use of a £0.8m specific reserve to partially offset the extension of the Action Fraud service ahead of the launch of FCCRAS.
 - **Slide 21-23** details the forecast outturn against the £1m Police Authority Board Team budget for 2024/25. Overall the Q2 outturn forecast is expected to an underspend of £70k, after allowing for potential hearing costs, some jointly funded work with the Force and some small grant giving activities, which the PAB Team has been trialling. This is mainly due to an ongoing vacancy in the team. Slides 22-23 provide an overview of spend against a series of initiatives funded through a £1m Home Office grant to enhance policing of antisocial behaviours in "hotspot" areas. Against the £1m budget, expenditure to the end of Q2 is £243k and while it

is expected that hotspot activities will increase in the second half of the financial year, there is a risk of under-utilisation. A further update will be provided at Q3.

CoLP Capital Programme:

7. Following discussion at the last RREC meeting, the Capital slides now lead with the Whole Life Capital spend by project analysis, which show an indicative £1.1m of overspend across the project set (subject to governance and affordability assessment).
8. The total CoLP Capital Programme budget for 2024/25 totals £10.345m. The forecast outturn for the year totals £13.362m, which represents a net overspend of £3.017m. The overspend is due to the rephasing of FCCRAS milestone payments from 2023/24 into 2024/25. While some of the FCCRAS milestones may be further reprofiled into 25/26, full drawdown will be achieved against the Home Office capital grant this year. Noting that potential increases in whole life FCCRAS capital requirements, which would likely impact on 25/26, would require further discussions on funding.
9. Additionally, delays to the start of several national programmes, such as the Command and Control project, has resulted in capital underspends of £0.825m in 2024/25. It is intended for there to be a degree of reprioritisation of this underspend subject to project prioritisation and approvals, with the medium-term financial implications on affordability resulting from any substitution and re-prioritisation continuing to be assessed.

Capital Programme Funding

10. The Force's capital programme is either funded directly from the Force's own resources, from Home Office funding or via a City Corporation loan facility. CoLP's Medium Term Financial Plan (MTFP) provides for £5m of direct revenue financial (DRF) per annum in addition to a £1m loan repayment. While the expectation is that CoLP's capital programme will be managed within the £5m DRF, circumstances may arise where use of the internal loan facility may be necessary and appropriate. This includes the City's £10m contribution to FCCRAS capital spend.
11. In support of the Q2 capital monitoring position:
 - **Slide 24** provides a capital programme summary
 - **Slides 25-26** provide a breakdown of CoLP capital projects underway and "whole life" phasing of expenditure across all years through to their completion;
 - **Slides 27-29** provide notes on variations to budget;
 - **Slides 30-31** provides a summary of the monitoring headlines at Q2 including a funding analysis
 - **Slides 32-33** provide a breakdown of the 2024/25 CoLP Capital

- **Slide 34** Programme budget, compared to the latest outturn forecast at Q2 against each project; and provides details of Corporation led Projects benefitting CoLP.

Monitoring of the Capital Programme

12. Capital expenditure and project delivery progress will be reported each quarter to the Resources, Risks & Estates Committee and the Police Authority Board.

Recommendations

13. Members of the Resources, Risks & Estates Committee and the Police Authority Board are asked to note the revenue and capital monitoring position at Q2 and forecast outturn for 2024-25 as set out in this covering report and accompanying slide pack.

Appendices

2024/25 Q2 revenue and capital monitoring slide pack (of 34 slides as referred to in this covering report).

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Resources, Risks and Estates Committee (RREC)
Police Authority Board (PAB)

Revenue & Capital Monitoring 2024/25 **Q2 (April – September)**

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Dates: 19th November 2024 (RREC)
4th December 2024 (PAB)



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

2024/25 Q2 - Revenue & Capital Summary

CoLP Revenue Outturn Summary

Whilst a balanced outturn forecast has been maintained at Q2, critically this has only been achieved through the release of budgetary provisions, use of an earmarked reserve, a significant increase in overhead cost recovery from funded activities and unplanned pay savings. Consequently, the 2024/25 revenue budget is now at its limit for absorbing any additional cost pressures. The overall gross expenditure outturn variance for 24/25 is expected to be a significant overspend of £9.7m (Q1: £10.1m), which is mainly due to the revised implementation plan for the launch of the Future Cyber Crime Reporting and Analysis Service (FCCRAS). This has necessitated extensions to existing Action Fraud service contracts of c£13.1m and is reflected in the additional supplies and services expenditure shown in Table 1. Although this cost pressure at Q2 has been mitigated through a 50:50 risk share arrangement with the Home Office, the application of additional overhead recovery and use of a specific earmarked Action Fraud reserve, further pressure arising from programme replanning will not be absorbable in so far as it relates to 24/25, without additional funding.

Key variances at Q2 are explained in slides 3-8 with an accompanying “bridge” analysis of key variances on slide 9. Emerging risks and opportunities identified at Q2 (30 September 2024) are set out in slide 11.

Capital Outturn Summary

Capital reporting has been developed to lead on the whole life capital cost position for projects, which is showing an indicative £1.1m total increase on budgets (subject to governance and affordability assessment). For 2024/25 capital is forecast to be £13.362m (Q1:£14.862m), compared with total budget of £10.345m. The overspend of £3.017m is due to rephasing of FCCRAS milestone payments from 2023/24 to 2024/25 (with Home Office capital contribution being fully utilised), with further profiling of £1.5m of retention payments into 25/26. Additionally, delays to several national programmes have created underspends in 2024/25 of £0.825m, against which some utilisation is proposed to bring forward other change and continuous improvement priorities (while managing risk of overcommitting and creating downstream affordability challenges from such substitution). As at Q2 £0.391m remains uncommitted.

Police Authority Board Outturn Summary

The outturn for the Police Authority Team budget is £930k (Q1: £928k) against a latest approved budget of £1m, an underspend of £70k (Table 6 below refers), which is mainly due to an on-going vacancy in the PAB Team. Utilisation of the £1m 2024/25 Hotspot grant is also shown in Table 7, with current expenditure at the mid-year point totalling £242.6k. Whilst patrols/activity is expected to increase in the second half of the financial, there is a risk of under-utilisation which is being reviewed.

2024/25 Q2 - Revenue Summary

| Table 1 | Budget Q2 YTD | Actual Q2 YTD | Variance to Date (Better) / + Worse | 24/25 Full Year Budget | Projected Outturn (Better) / + Worse | Projected Variance (Better) / + Worse | Notes |
|-----------------------------|----------------|---------------|-------------------------------------|------------------------|--------------------------------------|---------------------------------------|--------|
| 2024/25 CoLP Revenue Budget | £m | £m | £m | £m | £m | £m | |
| PAY | | | | | | | |
| Officers | 39.9 | 38.3 | (1.6) | 79.9 | 79.1 | (0.8) | (i) |
| Staff | 21.2 | 17.1 | (4.1) | 42.3 | 39.0 | (3.3) | (ii) |
| Overtime | 1.4 | 1.8 | 0.3 | 2.9 | 3.3 | 0.4 | (iii) |
| Agency | 0.6 | 0.8 | 0.2 | 1.1 | 1.1 | (0.0) | |
| Police Officer Pension | 9.3 | 0.0 | 0.0 | 18.6 | 19.5 | 0.9 | (iv) |
| Indirect employee costs | 1.5 | 1.0 | (0.4) | 2.9 | 2.8 | (0.1) | (v) |
| TOTAL PAY | 73.9 | 59.0 | (5.5) | 147.7 | 144.8 | (2.8) | |
| NON-PAY | | | | | | | |
| Premises Costs | 2.1 | 1.5 | (0.6) | 4.3 | 4.4 | 0.1 | |
| Transport | 1.4 | 0.3 | (1.1) | 2.8 | 2.7 | (0.1) | (vi) |
| Supplies and Services | 17.5 | 27.8 | 10.3 | 35.0 | 48.3 | 13.3 | (vii) |
| Third Party Payments | 4.8 | 4.8 | (0.0) | 9.3 | 9.3 | (0.0) | |
| Unidentified Saving | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | |
| CoL Support Services | 1.5 | 0.1 | (1.4) | 3.4 | 3.4 | (0.0) | |
| Capital Charges | 3.8 | 0.0 | (3.8) | 7.5 | 7.3 | (0.2) | (viii) |
| Transfer to Reserve | 0.3 | 0.0 | (0.3) | 0.5 | 0.5 | 0.0 | |
| TOTAL NON-PAY | 31.4 | 34.5 | 3.1 | 62.8 | 75.9 | 13.0 | |
| TOTAL EXPENDITURE | 105.3 | 93.6 | (2.4) | 210.5 | 220.7 | 10.2 | |
| INCOME | | | | | | | |
| Specific Grants | (51.6) | (17.7) | 33.9 | (72.6) | (83.2) | (10.6) | (ix) |
| Partnership | (8.1) | (4.7) | 3.4 | (16.2) | (15.4) | 0.8 | (x) |
| Fees & Charges | (1.6) | (0.4) | 1.2 | (3.2) | (2.5) | 0.5 | (xi) |
| Transfer from Reserves | (1.0) | (0.0) | 1.0 | (2.0) | (3.0) | (1.0) | (xii) |
| CoLP Core Funding | (41.7) | (41.7) | 0.0 | (114.1) | (114.1) | 0.0 | |
| Capital Financing | (1.2) | 0.0 | 1.2 | (2.5) | (2.5) | 0.0 | |
| TOTAL INCOME | (105.3) | (64.5) | 40.8 | (210.6) | (220.7) | (10.2) | |
| UNDERLYING DEFICIT | 0.0 | 29.0 | 38.3 | (0.1) | 0.0 | 0.0 | |

2024/25 Q2 - Revenue Monitoring Supporting Information

(i) Police Officer Pay

The forecast for Police Officer pay is an underspend of £0.7m underspend (Q1: £354k overspend) against a latest approved budget of £79.9m (0.9%). The change in variance from Q1 is largely due to the release of contingency to manage the Uplift over-recruitment risk (£0.5m) noting wider budgetary pressures and workforce plans (slide 9) which show police officer numbers being below budgeted assumptions in, July and August and the continuation of this trend for the period October through to February 2025. This is coupled with a more accurate costing of recruitment plans for funded activities where outcomes are lower than budgeted and there are compensating reductions in income.

Home Office Uplift Grant Progress - As at, 30 September 2024, the officer headcount totalled 999 and this has secured £1.55m (or 50%) of the ringfenced Police Uplift Funding (PUP) for 2024/25. There is a further Home Office headcount checkpoint on 31 March 2025, and it is forecast that CoLP will continue to exceed its budgeted headcount on this date to secure the remaining PUP funding. Careful monitoring of the workforce plan will continue through 24/25 via the Force's Strategic People Board.

In July 2024, the Government announced a 4.75% pay award for Police Officers and has provided, nationally £175m, to compensate forces for a pay award settlement above 2.45%; 2.5% being the mode pay award assumptions for forces across England and Wales. Of the £175m, it is understood that £7.7m has been ringfenced by the Home Office to provide additional funding for non-core funded activities. The remaining £167.3m has been allocated in line with the core funding formula, of which CoLP has received £1.2m. Based on a 3% budgeted pay award for Officers and Staff, the funding above a 2.45%, provides £0.2m of additional funding, which at Q2 has offset the cost of staff contribution pay (for those at top of scale).

Separately, the Government has also announced a £1,250 increase the maximum rate for the London Allowance, however, this is not subject to additional Home Office funding. Instead, the rate paid is determined by the Commissioner with approval from the Police Authority Board. No decision has been made to increase the rate of London Allowance payable to officers, although due to a payroll error an erroneous payment was made to officers in September 2024. A decision by the Commissioner, having informed the Police Authority Chair, not to clawback this overpayment has added a £104k pressure to the 2024/25 budget, which has been absorbed within this forecast.



2024/25 Q2 - Revenue Monitoring Supporting Information

(ii) Police Staff Pay

Police Staff pay, compared to a budget of £42.3m, is forecast to be underspent by £3.5m by the end of the Financial Year. This underspend is largely driven by slower than expected staff recruitment including vetting delays with CoLP's staff strength as at 31 March 2024, being 463 FTEs compared to a budgeted permanent establishment of 539, see slide 9. Whilst the trajectory of staff recruitment has increased, current workforce plans (slide 9) indicate that the number of unplanned vacancies will continue for the remainder of this financial year. It is important to note that in so far as this relates to funded work, there are compensating reductions in income. A 3% staff pay award has been proposed with effect from the 1 July 2024 and negotiations continue with staff unions over the quantum of the award. Included within the 2024/25 staff pay offer was the re-introduction of a 2% contribution pay element for staff who are at the top of their grade from October 2024. It is estimated that the cost of implementing this pay award measure in 2024/25 is £149k. The 24/25 budget assumed a 3% increase in staff pay, however, should the final award exceed 3%, every 1% increase above 3% will have a £420k full year impact.

(iii) Overtime

Officer overtime is forecast to be £0.4m overspent (£0.1m overspend in Q1) against the original budget of £2.9m. The increase from Q1 is largely due to policing on special one-off events/protest activities such as Op Navette, Op Mayfield and Extinction Rebellion, as well as the backfilling of vacancies in specialist commands such as the Tactical Firearms Team. Overtime is subject to local controls and review at the Force's Strategic Finance Board. The forecast will continue to be developed in Q3, see slide 13.

(iv & ix) Pension Deficit Grant

From 1 April 2024 employer contributions into the Police Officer Pension Scheme increased by 4.3%, rising from 31% to 35.3%. The impact of this is expected to be a net increase in cost to the CoLP Police Pension account of £0.9m which will be fully funded by additional Home Office grant income.



2024/25 Q2 - Revenue Monitoring Supporting Information

(v) Indirect Employee Costs

Indirect employee costs are forecast to be underspent by £0.2m (Q1: £0.4m). This is mainly due to lower than anticipated expenditure on employee related training costs due to on-going vacancies.

Non-Pay:

Overall non-pay costs are anticipated to be £13.0m overspent by the end of the Financial Year, however, this embeds several cost pressures which are mitigated by unplanned underspends and budget reprioritisation. including:

- A £0.1m underspend is forecast on Transport costs which is mainly due to £0.4m lower than estimated Concessionary Travel scheme costs resulting from higher than estimated officer contributions net of a £0.25m increase in vehicle purchase, hire and running costs (**note vi**).

• A £13.3m overspend is forecast on Supplies and Services budgets (**vi**) which is mainly due to:

- extending existing service contracts by rephasing FCCRAS “go-live”, £13.1m,
- additional Command and Control costs arising from a re-pricing exercise by the MPS, £0.3m
- an increase in data storage cost (£135k), outsourced forensic services (£85k) and radio equipment £58k because of both inflation and demand.
- The overspend also includes £0.4m of additional unbudgeted crime reduction expenditure which is matched by a corresponding drawdown from an earmarked POCA reserve (**Table 4**).
- These are partially off-set by a £0.5m reduction in forecast supplies and service “core” expenditure across a range of services. This represents c4% of total “core” (c£13.1m) supplies and service budgets.

While it is anticipated that the additional FCCRAS cost pressures will be mitigated through additional Home Office Grant funding and use of internal core resources including drawdown from reserves (**see notes xi & xii**), the Q2 forecast recognises the programme is in replanning. Any cost increases above the Q2 forecast would require an alternative funding strategy.



2024/25 Q2 - Revenue Monitoring Supporting Information

viii) Capital Charges

A £0.2m underspend is forecast against a £5.0m capital charges budget due to rephasing of the capital programme to balance the Q2 outturn forecast.

(ix) Specific Government Grants

The forecast Government Grant outturn is an over achievement of £10.6m against the original budget of £72.6m (£103.2m less £30.6m of Cyber Grant payments to other forces). This is due to £10.9m of additional forecast Home Office funding for National Lead Force activities (FCCRAS), a £1.2m Home Office pay award grant and £0.9m of pension deficit funding net of a £2.4m reduction in grants for funded activities due to reductions in programmed funding and recruitment delays. These include funding for the Fraud Reform, Fraud Legacy, Proactive Economic Crime Grant and Anti-Money Laundering Act Regulations (AMLAR) funding. This reduction in government grant income is matched by reductions in expenditure across pay and non-pay headings.

(x) Partnership Income

Partnership income is forecast to under-recover by £0.8m against an original budget of £16.2m. This is mainly due to an over-estimation of partnership income relating to the work of the Funded Units. This is matched by a corresponding reduction in expenditure across pay and non-pay budgets.

(xi) Fees and Charges

The year end outturn against fees and charges budgets is expected to be a shortfall of £0.5m. This is principally due to lower than anticipated receipts from the Economic Crime Academy, which is aligned to the 2023/24 final outturn. This reduction in income is matched by a corresponding decrease in operating costs for the training school and the budget will be fully revised for 2025/26.



2024/25 Q2 - Revenue Monitoring Supporting Information

(xii) Use of Reserves

The use of Reserves is forecast to increase by £1.0m from £2.0 to £3.0m This is due to the increased use of the POCA reserve (£0.2m) to fund eligible expenditure identified at Q1 (slides 17-20 refer) and a £0.775m drawdown from a specific an Action Fraud Reserve which was created in 23/24 to help mitigate contract extension cost pressures. It is expected that the use of this Reserve, in conjunction with additional Home Office funding and forecast savings within the Police budget will absorb the wider Action Fraud extension costs pressures in 24/25 ahead of the FCCRAS go live. Included within the £3.9m drawdown from the POCA reserves (Table 5) is a £981k contribution towards the cost of the 2024/25 capital programme.

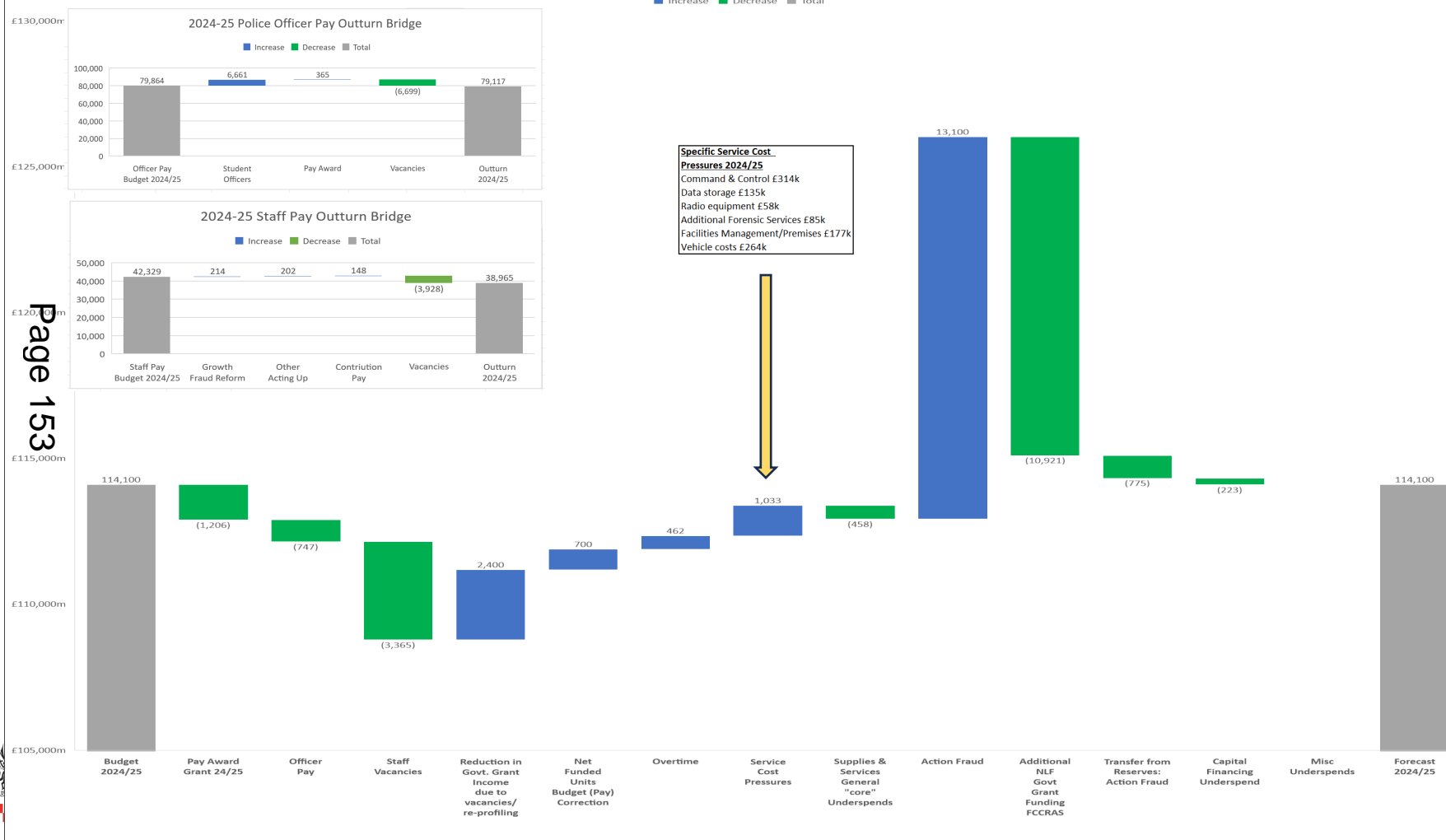
2024/25 Mitigations

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 In 24/25 CoLP was required to deliver £15.5m of mitigations to deliver a balanced budget. Of this some £8.5m related to increases in national (core grant £5.9m) and local (Business Rates Premium (BRP) £2.6m) funding which were realised. Of the remaining £7m, current forecasts suggest an over-achievement of £3m which is mainly due to better overhead recovery from funded work than anticipated in the 24/25 budget. This position remains unchanged from Q1.



2024/25 Q2 - Revenue Monitoring Bridge Analysis

Bridge from Net Budget to Forecast Outturn to 2024/25

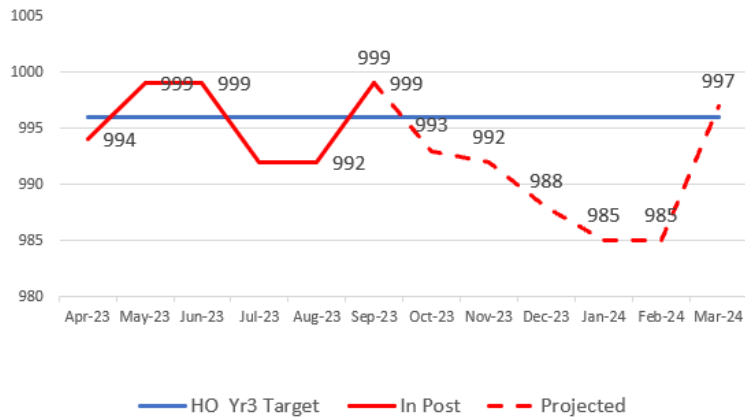


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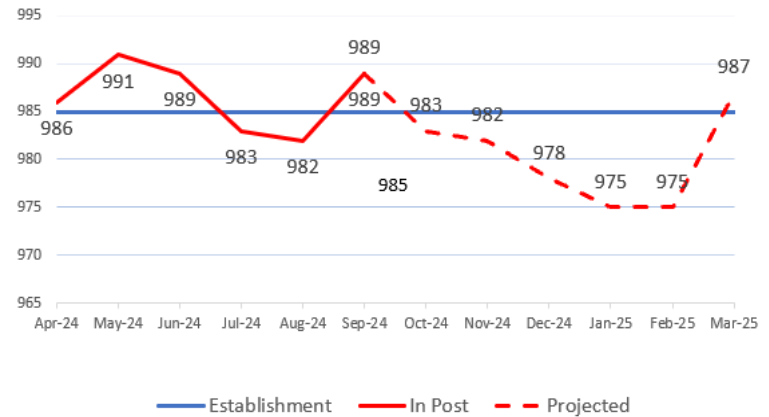
2024/25 Q2 – Workforce Dashboard

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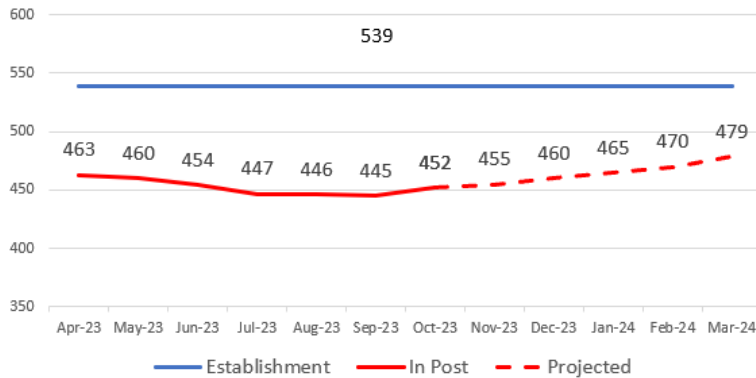
Uplift Maintenance Target (headcount) Totals



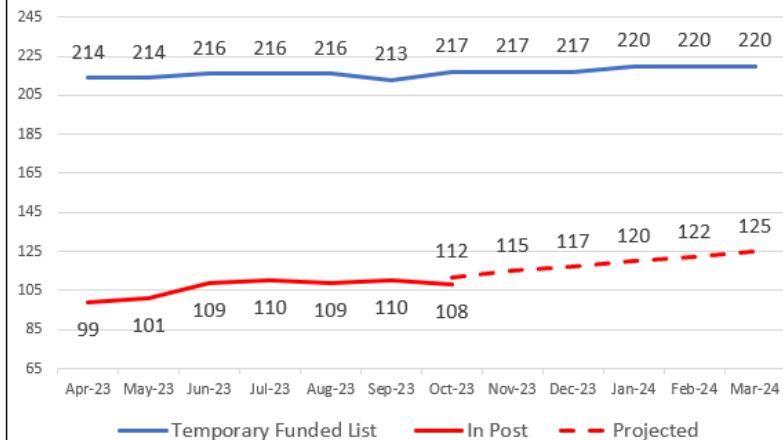
Officer Budgeted Establishment (FTE) Totals



Staff Strength (Core) vs Budgeted Establishment (FTE)



Staff Temporary (Funded) Strength (FTE)



2024/25 Q2 - Risks and Opportunities

There are several financial risks and opportunities outside of the Q2 monitoring period (1 April – 30 September 2024) which may impact the Force's final revenue outturn. These include:

Risks:

- FCCRAS implementation and further implications arising from the updated detailed delivery plan.
- The impact of any (unfunded) increase in the London Allowance payable to Police Officers should the Metropolitan Police Service (MPS) decide to enhance the London Allowance. The part year financial impact being c£0.82m rising to c£1.4m full year;
- The unconfirmed staff pay award, with every 1% increase above the 3% budgeted assumption representing a £420k cost pressure;
- Staff intake for the remainder of 2024/25 exceeding workforce planning assumptions impacting the unplanned vacancy factor off-setting wider cost pressures.
- Other downstream revenue consequence of the capital programme.
- Further unidentified operational pressures which could lead to an increase in overtime and other costs.
- Risk of failure to deliver / sustain mitigations

Opportunities:

- Unplanned staff vacancies due to a lower-than-expected staff recruitment outcomes.
- The 24/25 pay estimate for officers assumed a 3% increase in pay. With the Home Office funding 2.3% of the 4.75% increase there is a potential 0.55% cost benefit of c£200k.
- Further improvements in overhead recovery from funded activities.
- Early work on productivity review may identify early opportunities to at least better absorb operational and other demand pressures.



2024/25 Q2 - Mitigations

The 2024/25 revenue estimate included £15.5m of mitigations to deliver a balanced budget. Of this some £8.5m related to increases in national (Core grant £5.9m) and local (Business Rates Premium (BRP) £2.6m) funding which were realised. The remaining £7m of target mitigations are set out below and remains unchanged from Q1:

| Table 2 2024/25 Mitigations Plan | Target £m | Forecast £m | Variance Better/ (Worse) £m | Sustained £m | R A G | Notes |
|---|--------------|----------------|--------------------------------------|-----------------|-------------|-------|
| Reduction in Action Fraud exceptional costs | 0.5 | 0.0 | (0.5) | 2.0 | | (i) |
| Higher proportion of more junior PCs | 0.8 | 0.8 | 0.0 | 0.0 | | (ii) |
| Increased recharging of costs to funded activities and change | 3.1 | 6.6 | 3.5 | 3.1 | | (iii) |
| Non-pay savings: professional fees, release of inflationary provision & other | 1.8 | 1.8 | 0.0 | 1.8 | | (iv) |
| Adjustment for phasing of staff recruitment to full establishment | 0.8 | 0.8 | 0.0 | 0.0 | | (v) |
| Total | 7.0 | 10.0 | 3.0 | 6.9 | | |

Notes

- (i) **Action Fraud** – unrealised saving due to revised delivery implantation plan for the FCCRAS programme. The sustained saving includes the release of a £1.5m Action Fraud risk mitigation included in the 2024/25 budget .
- (ii) **More Junior PCs** – The Officer Uplift Programme resulted in a higher number of more junior PCs than in the Force’s operational model. Whist this provides a second year of savings in 24/25 with incremental progression and a higher proportion of attrition mitigated by transferees this saving is expected to be eliminated in 25/26.
- (iii) **Increased Recharging to Funded Activities** – includes £3.3m of additional overhead cost recovery from Home Office and £0.2m TfL funded work. NB. the mitigation includes the recovery of direct costs in addition to overheads where there has been an overachievement against plan.
- (iv) **Non-pay saving** – excluding FCCRAS - removed from 24/25 budgets.
- (v) **Trajectory of staff recruitment** – the mitigation is expected to achieved and in 24/25 exceeded by £2m due to slower than planned staff recruitment (not included as an additional mitigation as neither planned nor sustainable).

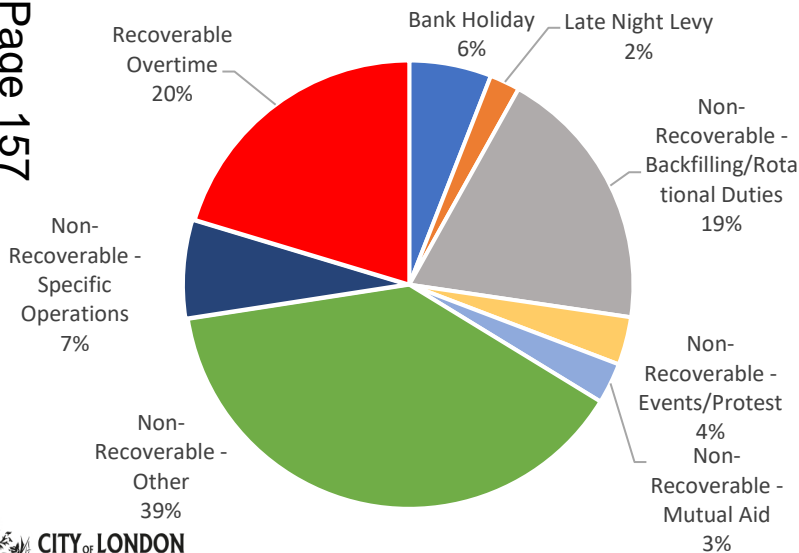
2024/25 Q2 – Overtime Analysis

Police Officer and Staff overtime outturn forecast is estimated to be £3.4m against a budget of £2.9m resulting in an overspend of £0.4m (Q1: £0.1m overspend). Of the £1.8m expenditure to date, £358k relates to recoverable activities such as the Funded Units for which CoLP expects to be fully reimbursed. There is, however, growing pressure in Taskforce (backfilling), intelligence, Investigation (major crime operation and re-active response) and Custody which is driving increased non-recoverable overtime. A summary of overtime incurred by category is shown below.

The overtime forecast will be further developed in Q3 taking account of recent national events and the impact of the police officer pay award which was above budgeted pay assumptions.

OVERTIME BY TYPE – APRIL TO SEPTEMBER 2024

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| Overtime Category | £'000 |
|---|--------------|
| Bank Holiday | 104 |
| Late Night Levy | 38 |
| Non-Recoverable - Backfilling/Rotational Duties | 338 |
| Non-Recoverable - Events/Protest | 61 |
| Non-Recoverable - Mutual Aid | 52 |
| Non-Recoverable - Other | 683 |
| Non-Recoverable - Specific Operations | 125 |
| Recoverable Overtime | 358 |
| Total Overtime Q2 (April to Sept 2024) | 1,758 |

The final 2024/25 overtime outturn will be influenced by the incidence of unexpected policing events across 24/25, noting that Home Office reimbursement is generally only available where overtime costs associated with a single event exceed a threshold of 1% of core funding. In the case of the City of London Police the threshold in 2024/25 is £664k per event.

Overtime will continue to be reported monthly to the Force's Strategic Finance Board.



2024/25 Q2 - Business Area Summaries

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

| Table 3: Q2 2024/25 Department Revenue Summaries | 2024/25 Budget (Q2 YTD) | 2024/25 Actual (Q2 YTD) | Variance to Date +Deficit / (Surplus) | 2024/25 Latest Budget | Projected Outturn +Deficit / (Surplus) | Projected Variance +Deficit / (Surplus) | Notes |
|---|--------------------------------|--------------------------------|--|------------------------------|---|--|--------------|
| | £m | £m | £m | £m | £m | £m | |
| Local Policing | 15.9 | 17.8 | 1.9 | 31.7 | 36.4 | 4.7 | (i) |
| Specialist Operations | 14.6 | 15.9 | 1.2 | 29.2 | 28.4 | (0.8) | (ii) |
| National Lead Force | 3.9 | 32.1 | 28.3 | 7.7 | 9.5 | 1.7 | (iii) |
| Corporate Services | 16.3 | 17.8 | 1.5 | 32.6 | 31.7 | (0.8) | (iv) |
| Central Income & Expenditure | 6.4 | (12.8) | (19.2) | 12.9 | 8.1 | (4.7) | (v) |
| Total | 57.0 | 70.8 | 13.7 | 114.1 | 114.1 | (0.0) | |

Local Policing: £4.7m overspend (Q1 £3.4m overspend). This is mainly due to a high number of Student Officers (135) being attached to Local Policing to gain neighbourhood policing experience during their two-year training programme. The cost of the student cohort in 24/25 is estimated to be £6.5m of which £3.3m will offset by police officer vacancies within Local Policing and the remainder through officer vacancies in other business areas. The 2024/25 police officer pay award (4.75%), has increased officer pay costs by £0.4m, although organisationally this will be off-set by a Home Office Pay Award Grant. Overtime is predicted to be overspent by £0.5m an increase of £0.4m from Q1 due to the learning curve of student officers, the backfilling specialist roles and policing protest events. The Q2 forecast also includes a provision for an increase in Command & Control and radio equipment operating costs of £0.4m. In relation to overtime there remains a risk that with recent national events there is a risk that the expected overtime variance could increase significantly. As in 24/25 pre-emptive measures have been put in place by the senior leadership team to contain overtime and this will be monitored closely through the local management team and via the Force's Strategic Finance Board.



2024/25 Q2 - Business Area Summaries continued

(ii) Specialist Operations (SO): £0.8m underspend (Q1: £1.6m underspend). Combined Officer, Staff and Overtime pay costs are forecast to underspend by £1.5m at the end of the financial year. This is mainly due to substantive vacancies in both officer and staff roles. The former being a consequence of maintaining officer numbers within the budgeted officer headcount of 996; considering the high number of student officers in Local Policing. Overtime remains a significant risk and the forecast will be developed each quarter in parallel with the senior leadership team. Savings are forecasted to be achieved in supplies and services budgets mainly due lower delays in Cyber Griffin growth (£280k). which will be offset by an increase of £85k in forensic services costs due to increased investigatory work and unbudgeted digital forensic storage costs £135k. An under recovery of £589k in Government Grants, is also expected due to a delay in recruitment and vacant funded roles. Other income is forecast to be overachieved by £152k due to Op Safeguard and TfL Special Services funding. The drawdown of funding from the Proceeds of Crime Act (POCA) to meet the cost of the Asset / Civil Recovery Teams has been reduced by £345k mainly due to vacancies.

(iii) National Lead Force: £1.7m overspend (Q1: £1.9m overspend). The forecast outturn for National Lead Force activities in 2024/25 is £9.5m compared to a latest budget of £7.7m resulting in an overspend of £1.7m. Whilst significant contract extension costs (£12.9m) associated with the revised delivery plan for the launch of the FCCRAS have been mitigated through additional Home Office funding and from internal CoLP resources. Scope changes to the design of the FCCRAS and lower than anticipated Action Fraud/FCCRAS savings compared to budgeted, along with a £0.7m core budget under-provision for one of the Force's funded units of have combined to create a £1.7m cost pressure. At this stage it is considered that this can be contained within wider savings – principally from staff underspends. However, the forecast assume that the FCCRAS project will be delivered within the timescales of the revised delivery implementation plan which was agreed at the beginning of 2024. Any further implications arising from the updated detailed delivery plan are outside of this Q2 forecast and will require a separate funding solution.



2024/25 Q2 Business Area Summaries continued

(iv) Corporate Services: £0.8m underspend (Q1: £0.9m underspend). Police Officer Pay is forecast to be underspent by £1.4m due to vacancies equivalent to 13 PC FTE, this is linked to the high number of student officers attached to Local Policing and the requirement to remain within a budgeted headcount of 996 officers. Staff Pay is also forecast to be underspent by £0.9m at the end of the financial year due to recruitment outcomes being lower than anticipated due in part to vetting delays. A Gold Group has been established to assess the implications and impact of the vetting delays and to make recommendations to increase throughput. Other Employee Related Expenditure is forecast to be underspent by £0.2m due to lower-than-expected training costs due to on-going vacancies. These pay savings of £2.5m are partially offset by additional agency worker costs of £0.5m to backfill vacancies, additional facilities maintenance costs £0.2m, increased forecast licence costs £0.2m, a shortfall in income arising from training courses (£0.2m) based on income generation to date and lower than expected staff cost recovery from funded activities and capital projects of £0.5m again due to vacancies.

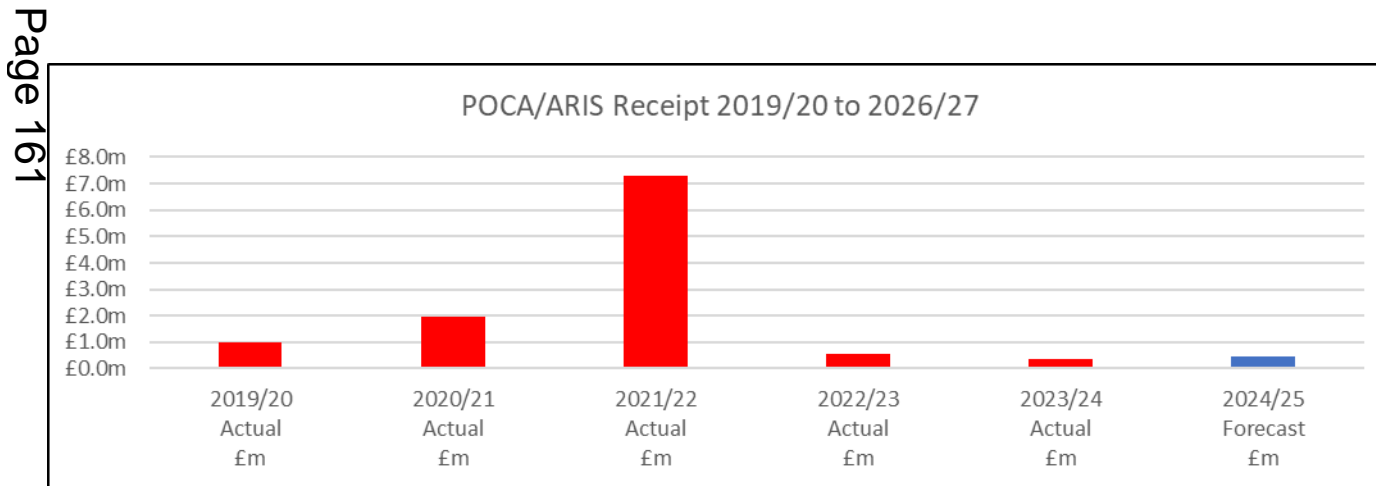
(v) Central Expenditure & Income (CE&I): £4.7m underspend (Q1: £2.8m underspend). This division of service is used to manage indirect income and expenditure items which relate to all business areas. In 2024/25 the CE&I budget included several provision to manage a staff pay award up to 3% and an officer adjustment factor to manage the Uplift risk of over recruitment against the 996 Officer target. Both provisions, totalling £1.4m have been released (Q1 £0.9m). In addition, a central contingency for agency pay costs of £0.2m has been made available to offset the higher than budgeted agency costs in Corporate Services. A further £0.4m underspend is expected on Transport costs due to lower net Concessionary Travel scheme expenditure resulting from higher than budgeted officer contributions and a £1.3m transfer from Reserves is shown in this business area to partially mitigate the Action Fraud contract extension costs (0.8m). Since Q1 a credit of £1.2m relating to the national police pay award has also been recognised in this business area.



2024/25 Q2 - Proceeds of Crime Act (POCA)/ Asset Recovery Incentivisation Scheme (ARIS)

The principal driver for Asset Recovery Incentivisation Scheme (ARIS) is to seek repatriation of funds to victims as detailed in the Proceeds of Crime Act (POCA). ARIS receipts should be used to drive up performance on asset recovery or, where appropriate, to fund local crime fighting priorities for the benefit of the community. Typically, the use of ARIS funds by POCA Agencies falls into four main categories: Crime Reduction, Community Projects, Asset Recovery work and Miscellaneous.

Currently, there are c£20m of victim focused assets under investigation with the Asset Recovery Team and a further £9.7m with the Civil Recovery Team. Any ARIS recoveries and receipts into the Force, however, are subject to final confiscation orders, future valuation and a 50% Home Office top slice. As demonstrated by the bar chart below, the actualisation of ARIS receipts varies significantly from year to year. While the current 2024/25 forecast is based on average receipts from 2022/23 and 2023/24, this will be updated in Q3 considering an assessment of pipeline activity being undertaken by the Asset Recovery Team.



2021/22 includes a significant ARIS/POCA receipt from Operation Neutron.



2024/25 Q2 - Proceeds of Crime Act Funded Expenditure

Table 4 below provides a summary of those revenue workstreams which are expected to be funded from the Proceeds of Crime Act (POCA) Reserve. In 2024/25 £2.2m of revenue and £0.8m of capital expenditure is expected to be funded from the POCA Reserve. The impact of this on the reserve position is shown in slide 20.

An explanatory note follows on slide 19.

| Table 4: Q2 2024/25 POCA Funded Expenditure | 2024/25 Approved Budget | Forecast Outturn 2024/25 | Projected Variance (Better) / + Worse | Notes |
|---|-------------------------------|-----------------------------|---|--------|
| | £'000 | £'000 | £'000 | |
| Safer City Partnership | 50 | 50 | 0 | (i) |
| Cyber Resilience Outreach Project (New) | 10 | 10 | 0 | (ii) |
| Fraud Forum Event (New) | 0 | 15 | 15 | (iii) |
| Total Community Projects | 60 | 75 | 15 | |
| Asset Recovery Team | 1,300 | 1,300 | 0 | (iv) |
| City Recovery Team | 300 | 400 | 100 | (v) |
| Total Asset Recovery | 1,600 | 1,700 | 100 | |
| Operation Creative | 200 | 138 | (62) | (vi) |
| NBCC Communications & Marketing | 10 | 0 | (10) | (vii) |
| Covert Tasking Budget | 60 | 5 | (55) | (viii) |
| Economic and Cyber Police HQ Communications Support (New) | 0 | 144 | 144 | (ix) |
| Total Crime Reduction | 270 | 287 | 17 | |
| NLF: People Strategy | 93 | 93 | 0 | (x) |
| Total Miscellaneous | 93 | 93 | 0 | |
| Total Revenue Funding | 2,023 | 2,155 | 132 | |
| Auto-Redaction (New) | 0 | 99 | 99 | (xi) |
| Out of Court Resolutions (New) | 0 | 148 | 148 | (xii) |
| Data Analytics (formerly Power BI): | 645 | 734 | 89 | (xiii) |
| Total Capital Funding | 645 | 981 | 336 | |
| Grand Total | 2,668 | 3,136 | 468 | |

2024/25 Q2 - Proceeds of Crime Act Funded Expenditure

Notes to table 4:

- i. Contribution to Safer City Partnership from annual ARIS receipts.
- ii. Funding to support an outreach project delivered in partnership with the London Cyber Resilience Centre.
- iii. Funding to support a Fraud Forum event to raise fraud awareness.
- iv. Funding of Asset Recovery Team was agreed for an initial period of three years 2022/23 to 2024/25 of £1.3m per annum. Forecast overspend due to pay inflation.
- v. Total funding of £300k pa was agreed from 23/24 to drive civil recovery activities across a period of three years.
- vi. Initiative, designed to disrupt and prevent websites from providing unauthorised access to copyright content.
- vii. Funding to support a communications support to business crime reduction.
- viii. Overtime/Tasking budget to support covert operations.
- ix. Funding to engage a temporary communications resource (18 months) to support CoLP's national economic and cybercrime capabilities.
- x. NLF People Strategy – Project designed to implement initiatives to improve recruitment and retention of staff within economic crime across the UK
- xi. Project to introduce an auto-redaction tool (nationally developed) to drive efficiencies and reduce failure demand.
- xii. Data Analytics (formerly PowerBI) is a project to improve business intelligence through data visualisation and integration (see Capital section).

All new bids are subject to a cost/benefits assessment. A review of the benefits and outcomes in relation to historic POCA funded initiatives is being undertaken and will be reported to this committee in due course.



2024/25 Q2 - Reserves

Police Reserves are set out in Table 5 below:

Based on the Q1 position, it is expected that Reserves will reduce by £3.5m from an opening balance of £13.6m to £10.1m. This is due to ARIS/POCA funded activities referred to in slide 17-19 and use of a specific Action Fraud Reserve which was created in 2023/24 to help mitigate the financial risk of the FCCRAS project.

The Force's General Reserve remains at 5% of Net Revenue Expenditure which is in line with Home Office expectations. The adequacy and any requirement to draw upon the General Reserve, will be kept under review.

| Table 5 | | Opening | Forecast | Forecast | Closing |
|--------------------------------------|--|----------------|------------------|-----------------|----------------|
| 2024/25 Use of Reserves | | Balance | Transfers | Transfer | Balance |
| | | 2024/25 | To | from | 2024/25 |
| | | £'000 | Reserve | Reserves | £'000 |
| | | £'000 | £'000 | £'000 | £'000 |
| General Reserve | | 6,595 | 0 | 0 | 6,595 |
| Specific Reserves: | | | | | |
| Proceeds of Crime Act | | 5,946 | 440 | (3,136) | 3,250 |
| Action Fraud Reserve | | 775 | 0 | (775) | 0 |
| Emergency Services Mobile Technology | | 294 | 0 | 0 | 294 |
| Total Specific Reserves | | 7,015 | 440 | (3,911) | 3,544 |
| Total | | 13,610 | 440 | (3,911) | 10,139 |



2024/25 Q2 - Police Authority Team Revenue Budget

Table 6 sets out the Police Authority Team budget and forecast outturn for 2024/25.

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| Table 6: Police Authority Team Budget 2024/25 | Budget Q2 YTD | Actual Q2 YTD | Variance to Date (Better) / + Worse | 24/25 Full Year Budget | Projected Outturn +Deficit / (Surplus) | Projected Variance +Deficit / (Surplus) | Notes |
|--|--------------------------|--------------------------|--|---------------------------------------|---|--|--------------|
| | £'000 | £'000 | £'000 | £'000 | £'000 | £'000 | |
| Pay | | | | | | | |
| Staff | 128.7 | 328.5 | 199.8 | 772.0 | 702.1 | (69.9) | (i) |
| Indirect employee costs | 2.5 | 3.0 | 0.5 | 15.0 | 15.0 | 0.0 | |
| Total Pay | 131.2 | 331.5 | 200.3 | 787.0 | 717.1 | (69.9) | |
| Non-Pay | | | | | | | |
| Transport | 0.3 | 0.0 | (0.3) | 2.0 | 2.0 | 0.0 | |
| Supplies and Services | 51.8 | 76.3 | 24.4 | 311.0 | 261.0 | (50.0) | |
| Third Party Payments | 0.0 | 253.0 | 253.0 | 0.0 | 253.0 | 253.0 | (ii) |
| CoLC Recharges | 0.0 | 0.0 | 0.0 | 0.0 | 50.0 | 50.0 | |
| Non-Pay | 52.2 | 329.2 | 277.1 | 313.0 | 566.0 | 253.0 | |
| Total Expenditure | 183.3 | 660.7 | 477.4 | 1,100.0 | 1,283.1 | 183.1 | |
| Government Grants | (50.0) | (344.5) | (294.5) | (100.0) | (353.0) | (253.0) | (iii) |
| Total Income | (50.0) | (344.5) | (294.5) | (100.0) | (353.0) | (253.0) | |
| Net Expenditure | 133.3 | 316.2 | 182.9 | 1,000.0 | 930.1 | (69.9) | |

- (i) The forecast outturn for the Police Authority Team budget as at Q1 2024/25 is an underspend of £69.9k which is mainly due to a staff vacancy.
- (ii) The variance in third party payment and Government grants relates to a payment to the London Borough of Lambeth in respect of the Safer Streets Fund.



2024/25 Q2 – Hotspot Funding

Outside of the approved 2024/25 budget, the PAB Team will also administer £1m of hotspot funding to tackle serious violence and anti-social behaviour with a visible 'hotspot' policing presence via eight initiatives. As show in in Table 7 below total expenditure to the end of Q2 is £242.6k, although it is expected that hotspot activities will increase in the second half of the financial year, as at this point the outturn forecast remains to budget, however, there is a risk of under-utilisation of this grant funding. A further update will be provided at Q3.

| Table 7 Hot Spot Funding Initiatives 2024/25 | | Budget Q2 YTD | Actual Q2 YTD | Variance to Date (Under) / + Over | 24/25 Full Year Budget | Projected Outturn (Under) / + Over | Projected Variance (Under) / + Over | Notes |
|---|--------------------------|------------------|------------------|--|------------------------------|---|--|--------|
| | | £'000 | £'000 | £'000 | £'000 | £'000 | £'000 | |
| (i) | Analytical Staff | 52.0 | 29.7 | (22.3) | 104.0 | 104.0 | 0.0 | (i) |
| (ii) | Dedicated Ward Officers | 18.0 | 7.7 | (10.3) | 36.0 | 36.0 | 0.0 | (ii) |
| (iii) | Acquisitive Crime Teams | 69.5 | 71.4 | 1.9 | 139.0 | 139.0 | 0.0 | (iii) |
| (iv) | Cycle Teams | 56.0 | 24.4 | (31.6) | 112.0 | 112.0 | 0.0 | (iv) |
| (v) | Bridge Crime | 90.0 | 95.0 | 5.0 | 180.0 | 180.0 | 0.0 | (v) |
| (vi) | Operation Vigilant | 123.0 | 8.1 | (114.9) | 246.0 | 246.0 | 0.0 | (vi) |
| (vii) | Taxi & Compliance Checks | 15.5 | 6.3 | (9.2) | 31.0 | 31.0 | 0.0 | (vii) |
| (viii) | CCTV Monitoring Staff | 76.0 | 0.0 | (76.0) | 152.0 | 152.0 | 0.0 | (viii) |
| Total | | 500.0 | 242.6 | (257.4) | 1,000.0 | 1,000.0 | 0.0 | |



2024/25 Q2 - Police Authority Team – Hotspot Funding

Notes to Table 7:

- i. **Analytical Staff** - this initiative totals £104k and was submitted to increase the number of analytical staff to gather more and better data on serious violence and ASB in the City alongside tracking the impact of the other Hotspot initiatives. Expenditure to date is lower than anticipated due to initial recruitment delays which have now been resolved.
- ii. **Dedicated Ward Officers (DWO)** £36,000 of funding was proposed to more DWO patrols in the City's residential estates. Patrols are on-going with the expectation that activity will increase in Q3 & Q4 and in particular during the Christmas and New Year period.
- iii. **Acquisitive Crime teams** – £138,000 of funding to enable more foot patrols to prevent business and personal robberies and thefts. Patrols are on-going with the expectation that activity will increase in Q3 & Q4 and in particular the Christmas and New Year period.
- iv. **Cycle Team** – £112,000 of funding for the increased deployment of the Cycle Team to tackle robbery, theft, and ASB. Patrols are on-going with the expectation that activity will increase in Q3 & Q4 and in during the Christmas and New Year period.
- v. **'Bridge Crime'** initiative - £180,000 has been allocated to the delivery of a multi-borough initiative tackling crime on and around inner London bridges. This makes up the funding cut to a separate Home Office grant (Safer Streets Fund). Expenditure to date is on track.
- vi. £246,000 for **Operation Vigilant** – training officers to prevent sexual violence in the night-time economy and significantly increasing police patrols in NTE hotspots. This project has been delayed due to abstractions linked to the national public disorder which meant that training, to maximise efficiency of the operation had to be delayed. A new course has been scheduled for the end of October 2024, which will see an increase in the number of officers who will be able to take part in Vigilant deployments. Correspondingly it is expected that there will be increase in activity in Q2 & Q3.
- vii. £31,000 for **Taxi and Compliance checks** – funding periodic deployment of officers to tackle taxi touts and check taxis and private hire vehicles in the City. Deployment is on-going with the expectation that activity will increase in Q3 & Q4 and in particular the Christmas and New Year period.
- viii. £152,000 for more **CCTV monitoring staff** – significantly increasing the number of staff monitoring CCTV feeds during peak hours, improving the real-time detection and prevention of crime. Vacancies in the Force Control Room (FCR) in Q1 & Q2 it restricted activity against this initiative, With improved staffing level in the FCR it is anticipated that activity will commence in Q3.



Capital Monitoring

Change Portfolio Summary

- The City of London Police are currently in a significant period of change as a result of national and local responsibilities in addition to local, regional and national need for change. Positively, the change programme itself and intended deliverables are designed to meet legislative requirements, increase productivity and improve effectiveness in all areas of policing.
- Due to the very nature of policing, the management of projects and service improvements requires agility and, on occasion, reprioritisation of the planned programme. New legislative requirements, as well as changes in political direction and risk levels can all be factors driving the necessity for that agility, but other driving factors include changes to national programmes which are out of our control.

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 The capital plan for 2024/25 includes several of these projects and programmes and has seen delay in timescales resulting in impacts to intended spends. However, due to a robust prioritisation process, and an extensive list of pending projects, designed to optimise the service to be its very best, a proposal to utilise the spend already agreed for the existing plan for additional projects is made. This work acknowledges the need for delayed projects to move into future years but a comprehensive and cohesive approach to planning between the Change Portfolio and Finance colleagues is in place to assure future projections and formalise the capital plan over coming years.

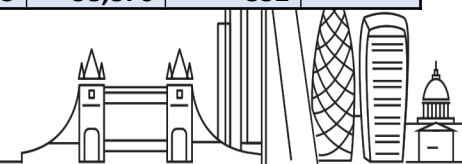
- Slides 25 to 29 set out the Whole Life Capital costs by project, which shows an indicative £1.1m total increase on budgets (subject to governance and affordability assessments).
- Slides 30 to 33 set out the in-year 24/25 forecasts for approved projects.



Whole Life Capital Spend by Project [Slide 1 of 2]

Prior to presenting the 24/25 forecast position for projects, it is important to put them in their whole life capital spend context. The total budget for each project is shown, across all phased years of its implementation, and is compared to its forecast outturn spend. The total budget for all CoLP projects underway totals £39.735m, which compares to a forecast outturn cost of £40.845m, representing an overspend of £1.110m (2.8%). This is largely due to increased cost of the Command and Control project (£432k) and E-discovery project (466k).

| Table 8 - Summary of all CoLP capital projects underway and their phasing | Budgeted Project Cost £'000 | Prior Year Actuals £'000 | 2024/25 Forecast Outturn £'000 | 2025/26 Forecast Spend £'000 | 2026/27 Forecast Spend £'000 | 2027/28 Forecast Spend £'000 | Forecast Project Outturn £'000 | Variance (Better) / Worse £'000 | Notes (on slides 27-29) |
|--|--|-------------------------------------|---|---|---|---|---|--|--------------------------------|
| FCCRAS | 31,038 | 21,758 | 7,780 | 1,500 | - | - | 31,038 | - | (a) |
| Cyclical replacement | 1,600 | - | 1,200 | 431 | - | - | 1,631 | 31 | (b) |
| - Laptop devices – refresh | 400 | - | 400 | - | - | - | 400 | - | (c) |
| - Firearms | 400 | - | 400 | - | - | - | 400 | - | (d) |
| - Horsebox | 817 | - | 358 | 459 | - | - | 817 | - | (e) |
| - Fleet replacement | 707 | - | 64 | 623 | 329 | 123 | 1,139 | 432 | (f) |
| Command and Control | 748 | 98 | 734 | 20 | - | - | 852 | 104 | (g) |
| Data Analytics (formerly Power BI) | 248 | 195 | 60 | 5 | - | - | 260 | 12 | |
| ICAV | 776 | 173 | 476 | - | - | - | 649 | (127) | (h) |
| Prioritisation and feasibility funding | 500 | - | 541 | - | - | - | 966 | 466 | (i) |
| E-discovery | 309 | 217 | 7 | - | - | - | 224 | (85) | |
| Body Worn Video | 106 | 46 | 63 | - | - | - | 109 | 3 | |
| Covert Camera System | 247 | 152 | 91 | - | - | - | 243 | (4) | |
| Covert Surveillance Equipment | 148 | - | 38 | 110 | - | - | 148 | - | (k) |
| Multi Agency Public Protection System | | | | | | | | | |
| Sub-total (continued next slide) | 38,044 | 22,639 | 12,212 | 3,573 | 329 | 123 | 38,876 | 832 | |



Whole Life Capital Spend by Project [Slide 2 of 2]

| Table 8 - Summary of all CoLP capital projects underway and their phasing | Budgeted Project Cost £'000 | Prior Year Actuals £'000 | 2024/25 Forecast Outturn £'000 | 2025/26 Forecast Spend £'000 | 2026/27 Forecast Spend £'000 | 2027/28 Forecast Spend £'000 | Forecast Project Outturn £'000 | Variance (Better) / Worse £'000 | Notes (on slides 27-29) |
|--|--|-------------------------------------|---|---|---|---|---|--|--------------------------------|
| Sub-total (continued from previous slide) | 38,044 | 22,639 | 12,212 | 3,573 | 329 | 123 | 38,876 | 832 | |
| Out of Court Resolutions (OoCR) | 163 | - | 148 | 5 | - | - | 153 | (10) | |
| Digital Asset Management System | 60 | - | 22 | 130 | 24 | 17 | 193 | 133 | (m) |
| Forensic Case & Quality Management System | 500 | - | 122 | 378 | - | - | 500 | - | (j) |
| Role-based Access | 77 | - | 22 | 55 | 21 | - | 98 | 21 | (l) |
| Forensic Image Management System (FIMS) | 59 | - | 59 | 3 | - | - | 62 | 3 | (p) |
| Auto-Redaction (POCA) (PILOT) | 99 | - | 99 | 5 | 20 | - | 104 | 5 | (q) |
| Supplementary Revenue Projects | 119 | - | 64 | 27 | 72 | 82 | 245 | 126 | (o) |
| Revenue funding from £5m DRF | 223 | - | 223 | - | - | - | 223 | - | (r) |
| Uncommitted | 391 | - | 391 | - | - | - | 391 | - | (n) |
| TOTAL COST OF PROJECTS UNDERWAY | 39,735 | 22,639 | 13,362 | 4,176 | 446 | 222 | 40,845 | 1,110 | |



CoLP Capital Programme [notes, slide 1 of 3]

Notes to tables 8 and 11:

- a) **FCCRAS:** The forecast overspend in 2024/25 of £3.017m is due to rephasing of FCCRAS milestones payments of £4.517m from 2023/24 to 2024/25, because of the delayed go live from March 2024 to December 2024, coupled with additional rephasing of £1.5m retention payments into 2025/26. While there may be further rephasing into 2025/26, there is no risk to existing Home Office capital funding which has been fully drawn down this year. Noting that potential increases in whole life FCCRAS capital requirements would require further discussions on funding.
- b) **IT device (laptops) refresh:** Approval has been given to replace laptops over two years at a cost of £1.703m (£1.200m in 2024/25 and £0.503m in 2025/26), partly offset by anticipated income of £0.072m from the return of existing devices, resulting in a net total cost of £1.631m. This compares to a budget in the 2024/25 capital programme of £1.200m, with a further provision of £0.400m in 2025/26, amounting to a total budget of £1.600m across the two years which represents a shortfall of £0.031m.
- c) **Firearms:** A procurement options report was submitted to the Police and Emergency Planning Category Board on 6th August. A report will be submitted to Strategic Finance Board in due course with the outcome of this evaluation work and a final cost estimate for approval.
- d) **Horsebox:** There was a delay purchasing the horsebox due to limited supplier selection nationally, but the horsebox is now in the country and due for delivery later this year. There is a commitment to spend £285k in 2024/25, and with further costs to be incurred as the build progresses, it is anticipated that the full £400k budget will be spent in 2024/25.
- e) **Fleet replacement:** an order was placed in August 2024 for 2 Volvo XC90 Armed response Vehicles (ARVs) costing £122k. This reduces the remaining budget in 2024/25 to £236k, which is available for other vehicles which maybe prioritised ahead of establishment of an approved fleet strategy, which will inform the fleet funding requirement across future capital programmes.
- f) **Command and Control:** Forecast spend in 2024/25 reduced to £64k due to the delay in the MPS reset which is now anticipated to start towards the end of the year. However, the latest estimate of outturn project spend has risen to £1.139m, which would represent an overspend of £0.432m compared to the original budget of £0.707m.



CoLP Capital Programme [notes, slide 2 of 3]

Notes to tables 8 and 11:

- g) **Data Analytics (formerly Power BI):** Phase 1 was completed in 2022/23 at a cost of £98k. It is now anticipated that remaining and final spend of £734k will take place in 2024/25, which would be £84k ahead of the remaining budget provision.
- h) **Prioritisation and feasibility funding:** a budget provision to progress the overarching management of change for CoLP, alongside the quick-time progression of some pipeline projects prior to their gateway 2 attainment. Mainly due to delays in the identification of suitable candidates and their vetting, £476k is committed in the 2024/25, leaving £129k remaining available.
- i) **E-discovery:** based on current estimates there is a risk of project overspend of £0.466m. However, this will be reviewed subject to procurement options and solutions being identified.
- j) **Forensic Case and Quality Management System:** early scoping to take place in 2024/25, with most spend now likely in 2025/26.
- k) **Multi Agency Public Protection System:** a delayed national project – currently in test phase but due for delivery Dec 2024, with most spend expected in 2025/26.
- l) **Role Based Access:** a delayed national project – now anticipated to start late 2024/25, with the majority of spend in 2025/26.
- m) **Digital Asset Management System:** not yet commenced due to resourcing pressures and reprioritisation, anticipated to start later in 2024/25, with most spend slipping to 2025/26.
- n) **Underspends:** due to several projects being delayed, largely due to the timing of national programmes, it is proposed to make some use of the resulting £0.825m underspend (excluding FCCRAS) to bring forward change and continuous priorities. Currently 5 proposed projects are included in Table 10 (see project notes o, p and q, which lists 3 new supplementary revenue projects overleaf), with £0.391m remaining available for further new projects.



CoLP Capital Programme [notes, slide 3 of 3]

Notes to table 8 and 11:

o) Revenue Projects under the £50k Capital de minimis

Existing Supplementary Revenue projects include:

- Home Office Biometrics (national) – **£24k** 24/25 slipped, moved into 25/26
- Digital Investigation and Intelligence (national) - **£14k** 24/25 slipped, moved into 25/26
- Digital Case File (national) - **£12k** slipped, moved into 25/26
- Joint ERP System (local) – **£10k** 24/25
- Tackling Organised Exploitation Programme (TOEX) (National) – **£7k** 24/25 slipped, moved into 25/26
- Rape Response Review (national) – **£1k** 24/25

Total £68k

New Supplementary Revenue projects include:

- Electronic Display Screen Equipment Management System (EDSEMS) (local) – Legislative compliance - **£34k** 24/25
- Travel System (AGITO) (local) – value for money, improved financial monitoring - **£9k** 24/25
- Operation Soteria (national) – national response to violence against women and girls - **£8k** 24/25

Total £51k

p) Forensic Image Management System (FIMS) – this project aims to introduce an automated, auditable system which allows images of unidentified suspects to be easily circulated. Implementation is expected in 2024/25.

q) Auto-redaction: a project to introduce an auto-redaction tool (nationally developed) to drive efficiencies and reduce failure demand.

r) CoLP Direct Revenue Financing – The CoLP revenue budget includes a £5m capital financing provision. To help mitigate in year revenue cost pressure and considering the slippage within the capital programme, £223k of the direct revenue financing budget has been re-prioritised. The requirement for this will be reviewed at Q3.



Capital Monitoring 2024/25 (Q2 to 30 September 2024)

Headlines [1 of 2]

The total CoLP Capital Programme budget for 2024/25 amounts to £10.345m as shown in table 9 below. The forecast outturn for the year totals £13.362m, which represents a net overspend of £3.017m. This is due to rephasing of FCCRAS milestones payments of £4.517m from 2023/24 to 2024/25, because of programme rephasing, with further profiling of retention payments of £1.5m into 2025/26. While there may be increased reprofiling into 2025/26, full drawdown will be achieved against the Home Office capital grant this year. Noting that potential increases in whole life FCCRAS capital requirements, which would likely impact on 2025/26, would require further discussions on funding.

| Table 9 - CoLP Capital Programme 2024/25 | 2024/25 Budget | 2024/25 Forecast Outturn | 2024/25 Variance: Budget vs Forecast Outturn |
|---|---------------------------|---|---|
| | £'000 | £'000 | £'000 |
| Total CoLP Capital Programme 2024/25 | 10,345 | 13,362 | 3,017 |

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 as summarised in Table 10 below.

| Table 10 – Funding of the CoLP Capital Programme 2024/25 | Forecast Outturn 2024/25 | City Loan | Home Office | CoLP Direct Revenue Financing | CoLP POCA |
|---|-------------------------------------|------------------|--------------------|--|----------------------|
| | £'000 | £'000 | £'000 | £'000 | £'000 |
| Total Funding Breakdown | 13,362 | 4,577 | 2,804 | 5,000 | 981 |

CoLP's MTFP now provides £5m pa for direct revenue financing (DRF) of capital plus £1m pa for loan repayment. While the expectation is that CoLP's capital priorities will normally be managed within the £5m DRF envelope, there may be exceptional circumstances where recourse to the internal loan facility may be necessary and appropriate. This includes the City's £10m contribution to FCCRAS capital spend. Accrued borrowing as at 1 April 2024 was £1.9m and is forecast to increase to £5.5m by 31 March 2025.



Capital Monitoring 2024/25 (Q2 to 30 September 2024)

Headlines [2 of 2]

The 2024/25 capital programme (summarised in table 9 on slide 30), is broken down across individual projects in table 11 on slides 32 and 33.

In addition to the re-phasing of FCCRAS milestone payments into 2024/25 and 2025/26, delays to the start to several national programmes has resulted in net capital underspends amounting to £0.825m (excluding FCCRAS) in 2024/25. It is intended for there to be reprioritisation of this net underspend subject to project prioritisation and approvals, with the medium-term financial implications on affordability resulting from any substitution and re-prioritisation continuing to be assessed. As it is intended to reprioritise the net underspends of £0.825m, they do not form part of the overall variance to budget of £3.017m in 2024/25, which is entirely due to the FCCRAS reprogramming.

Slide 34 captures several capital projects which are City of London Corporation led and outside of the Force's capital programme but have direct benefits to CoLP. These include the Future Police Estate, Secure City and the new Enterprise Resource Planning system.



CoLP Capital Programme 2024/25 [Slide 1 of 2]

The CoLP Capital Programme budget for 2024/25 amounts to £10.345m as shown in table 11 below. The forecast outturn for the year is £14.862m, which represents an overspend of £4.517m. The overspend is due to rephasing of FCCRAS milestones payments from 2023/24 to 2024/25 because of the delayed go live, from March 2024 to December 2024. Actual expenditure to date will be added into the Q2 based on full recharge information, noting that at the time of reporting (July 2024) some £3.9m has been accrued for FCCRAS milestones.

| Table 11 - CoLP Capital Programme 2024/25 | | 2024/25 Budget | 2024/25 Forecast Outturn | 2024/25 Variance: Bud. v Forecast Outturn | Notes on slides 27 to 29 |
|---|---|-------------------|--------------------------------|---|--------------------------------------|
| | | £'000 | £'000 | £'000 | |
| Page 76 | FCCRAS | 4,763 | 7,780 | 3,017 | (a) |
| | Cyclical replacement – IT Devices | 1,200 | 1,200 | 0 | (b) |
| | - Firearms | 400 | 400 | 0 | (c) |
| | - Horsebox | 400 | 400 | 0 | (d) |
| | - Fleet | 358 | 358 | 0 | (e) |
| | Command and Control | 707 | 64 | (643) | (f) |
| | Data Analytics Platform (formerly Power BI) | 645 | 734 | 89 | (g) |
| | Prioritisation and feasibility funding | 605 | 476 | (129) | (h) |
| | E-Discovery | 292 | 541 | 249 | (i) |
| | Forensic Case & Quality Management System | 216 | 122 | (94) | (j) |
| | Out of Court Resolutions | 163 | 148 | (15) | |
| | Multi Agency Public Protection System | 148 | 38 | (110) | (k) |
| | Court Surveillance Equipment | 91 | 91 | 0 | |
| | Body Worn Video | 79 | 7 | (72) | |
| | Role Based Access | 77 | 22 | (55) | (l) |
| Covert Camera System | 63 | 63 | 0 | | |
| Sub-total (continued next slide) | | 10,207 | 12,444 | 2,237 | |

CoLP Capital Programme 2024/25 [Slide 2 of 2]

| Table 11 - CoLP Capital Programme 2024/25 | 2024/25 Budget | 2024/25 Forecast Outturn | 2024/25 Variance: Bud. v Forecast Outturn | Notes on slides 27 to 29 |
|--|-------------------|--------------------------------|---|--------------------------------------|
| | £'000 | £'000 | £'000 | |
| Sub-total (continued from previous slide) | 10,207 | 12,444 | 2,237 | |
| Digital Asset Management System | 60 | 22 | (38) | (m) |
| ICAV | 10 | 60 | 50 | |
| Other Supplementary Revenue Projects | 68 | 11 | (57) | (o) |
| Sub-total (prior to new proposals) | 10,345 | 12,537 | 2,192 | |
| New proposals to utilise slippage: | | | | (n) |
| Forensic Image Management System (FIMS) | 0 | 59 | 59 | (p) |
| Auto Redaction (Pilot) | 0 | 99 | 99 | (q) |
| Other New Supplementary Revenue Projects | 0 | 53 | 53 | (o) |
| Contribution to revenue funding shortfall from £5m DRF | 0 | 223 | 223 | (r) |
| Uncommitted | 0 | 391 | 391 | (n) |
| Sub-total (new proposals) | 0 | 825 | 825 | (n) |
| Total CoLP Capital Programme 2024/25 | 10,345 | 13,362 | 3,017 | |



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): Policy and Resources Committee – For Decision Community & Children's Services Committee – For Information City Bridge Foundation Board – For Information Police Authority Board – For Information Court of Common Council – For Decision | Dated: 17/10/2024 11/11/2024 29/11/2024 04/12/2024 05/12/2024 |
| Subject: Modern Slavery Statement 2024–2029 | Public |
| Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly? | Providing Excellent Services |
| 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: Greg Moore, Deputy Town Clerk | For Information |
| Report author: Emily Slatter, Office of the Policy Chairman | |

Summary

This report accompanies a draft of the City Corporation's refreshed Modern Slavery Statement made pursuant to Section 54 of the Modern Slavery Act 2015. This is attached at Appendix 1.

The draft statement continues the work laid out in our 2018 and 2021 statements, outlining the steps that the City of London Corporation has taken and is continuing to take to ensure that modern slavery is not taking place within our organisation, within the Square Mile, or within our supply chains.

Recommendation(s)

Members are asked to:

- Approve the draft Modern Slavery Statement 2024-2029 at Appendix 1.
- Approve the publication of the draft statement at Appendix 1 both on the City Corporation website and the HM Government's Modern Slavery Statement registry.

Main Report

Background

1. This Modern Slavery Statement is made in response to Section 54 of the Modern Slavery Act 2015 ('the Act').
2. The City Corporation was not a relevant commercial organisation as defined by section 54 of the Act, however, in November 2018, Policy and Resources Committee signed off the City Corporation's Modern Slavery Statement. This decision aligns with our

dedication to responsible business principles and demonstrates our commitment to due diligence and transparency.

3. Members approved the first City Corporation Modern Slavery Statement in 2018 (Appendix 2). This brought together the roles, remits, commitments, and all work undertaken to tackle modern slavery and human trafficking across the organisation. This contained an ambition to publish a Modern Slavery Statement on an annual basis and set in motion a number of initiatives – e.g., a CoLC Modern Slavery Working Group.
4. The City Corporation have published a subsequent Modern Slavery Statement since by way of an update in 2021 (Appendix 3) coordinated by the Responsible Procurement Manager with support from officers across the Corporation.
5. Due to disruption caused by the outbreak of COVID-19 with subsequent resourcing pressures, the ability to keep an updated, annual publication of a Modern Slavery Statement has not been met.

Current Position

6. In 2023, an internal review was conducted to ascertain how we can improve on our efforts to combat modern slavery. Recommendations have been taken forward to relevant Department leads and incorporated within this statement.
7. As a result, the Deputy Town Clerk (DTC) has been put forward by the Town Clerk's Executive Leadership Board as Corporate Lead for the Corporation's Modern Slavery Statement. Moving forward, the DTC will be supported by a Modern Slavery Strategic Lead, to help coordinate delivery of contributing officers across the Corporation.
8. The draft put before Members at Appendix 1 has been written with support from the City of London Police, Department for Children and Community Services, Port Health and Public Protection, People and Human Resources, Corporate Strategy and Performance, Town Clerk's Department, Commercial, Change, and Portfolio Management team in the Chamberlain's Department and officers from the City Bridge Foundation.
9. It is intended this Statement will be valid for the period from 2024-2029, in line with our Corporate Plan and People Strategy, with any required textual changes to be updated annually. Our efforts to combat modern slavery will be reflected in respective Departmental and Institutional reporting.

Proposals

10. Members are asked to approve the Draft Modern Slavery Statement at Appendix 1 and approve the publication of the statement on both the City Corporation website and HM Government's Modern Slavery Statement registry.

Corporate & Strategic Implications

Strategic implications – Though this statement principally supports our Corporate Plan 2024-2029 ambition to Provide Excellent Services, all six outcomes are interlinked and strive for equity, equality, diversity and inclusion to ensure impactful delivery of services.

Financial implications – None.

Resource implications – Work on modern slavery has already been established and is being delivered by the relevant Departments and Teams. This paper does not request any changes to the level of resources allocated to tackle modern slavery.

Legal implications – The City of London Corporation is under no legal duty to produce a Modern Slavery Statement at this time.

Risk implications – None.

Equalities implications – Work to tackle modern slavery and, as relevant to the functions being discharged by the City Corporation, Equalities Impact Assessments would be completed by teams undertaking work to ensure proper consideration of equalities implications.

Conclusion

11. The City of London Corporation acknowledges its responsibility to identify and eradicate modern slavery within its operations. This Statement demonstrates the City Corporation's comprehensive and ongoing commitment to preventing modern slavery in all aspects of our organisation, jurisdiction, and supply chains.

Appendices

- Appendix 1 – 2024-2029 Modern Slavery Statement (Full Statement, and Statement Summary)
- Appendix 2 – 2018 Modern Slavery Statement
- Appendix 3 – 2021 Modern Slavery Statement Update

Emily Slatter

Office of the Policy Chairman

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City of London Corporation Modern Slavery Statement

1. At the City of London Corporation, we are committed to upholding the highest standards of ethical governance and transparency in our operations.
2. This Modern Slavery Statement continues the work laid out in our 2018 and 2021 statements, outlining the steps that the City of London Corporation ('City Corporation') has taken and is continuing to take to ensure that modern slavery is not taking place within our organisation, within the Square Mile, or within our supply chains.
3. This Modern Slavery Statement is made pursuant to Section 54 of the [Modern Slavery Act 2015 \('the Act'\)](#). Although the City Corporation is not classified as a relevant commercial organisation under Section 54 of the Act, we have made a clear commitment to publish a Modern Slavery Statement to align with our dedication to responsible business.
4. For the purposes of this Statement and associated Policy, the term 'Modern Slavery' encompasses slavery, servitude, human trafficking, forced or compulsory labour and child labour.
5. This Modern Slavery Statement sets out the steps the City Corporation is taking in a) discharging its functions to ensure that modern slavery is not taking place in its business, jurisdiction or supply chains, and b) to use its wider influence to reduce modern slavery risks and impacts. It is divided into three sections:

Part 1: Our Organisation - Prioritising our commitment at the highest level, protecting and educating staff and taking dedicated action and collaborating across the City Corporation to combat modern slavery.

Part 2: Our Jurisdiction - Minimising the risk of modern slavery occurring in the City of London and on City Corporation property, referring any victims to the help they need, ensuring any perpetrators are brought to justice and helping to identify modern slavery in any place the City Corporation has a presence.

Part 3: Our Supply Chains - Using responsible procurement and rigorous contract management to mitigate the risk of modern slavery taking place within our UK supply chain, and effective due diligence procedures to minimise the risks of using global suppliers who contravene human and labour rights and exploit people through modern slavery.

Part 1: Our Organisation

6. This Section outlines how the City Corporation prioritises our commitment at the highest level, protecting and educating staff and taking dedicated action and collaborating across the City Corporation to combat modern slavery.
7. It is intended this Statement will be valid for the period from 2024-2029 in line with our Corporate Plan and People Strategy, with any required textual changes to be updated annually. Our efforts to combat modern slavery will be reflected in respective Departmental and Institutional reporting.

The City of London Corporation

8. The City Corporation has a long history, a unique constitution, our own Lord Mayor, and a dedicated police service keeping the City safe.
9. The City of London Corporation looks after the City of London ('the City' or 'Square Mile') on behalf of all who live, study, work, and visit; providing modern, efficient, and high-quality local services and policing for all.
10. Aside from acting as a key spokesperson for the UK's Financial and Professional Services sector, we support London's communities through responsible business, as the corporate Trustee of a number of charities, including City Bridge Foundation, providing schools and skills for young people, and delivering affordable housing across London.
11. Beyond the City boundaries, our organisation's responsibilities to providing a host of additional facilities for the benefit of the nation including air and seaports, charitable giving, the Guildhall School of Musica and Drama, the Barbican Centre and over 11,00 acres of open spaces.

Our Corporate Plan 2024-2029

12. Our commitment to ensure that the City of London offers the best place to live, work, learn, and explore is guided by our core policy framework. Launched in April 2024, our [Corporate Plan 2024-2029](#) guides planning and decision-making for the City of London Corporation through six strategic outcomes, reflecting the vast portfolios covered by the City of London Corporation.
13. The six Corporate Plan outcomes are as follows:
 - [Vibrant Thriving Destination](#) — Attracting businesses and people to a safe, secure, and dynamic location is vital to our future. A world-leading culture and leisure offer is integral to creating a vibrant, thriving destination where everyone prospers.

- [Providing Excellent Services](#) — Supporting people to live healthy, independent lives and achieve their ambitions is dependent on excellent services. Vital to that continued pursuit is enabling access to effective adult and children’s social care, outstanding education, lifelong learning, quality housing, and combatting homelessness.
 - [Diverse Engaged Communities](#) — Across our residents, workers, businesses, and visitors, everyone should feel that they belong. Connecting people of all ages and backgrounds will help build diverse, engaged communities that are involved in co-creating great services and outcomes.
 - [Dynamic Economic Growth](#) — The City of London is the engine in the country’s economy. Driving dynamic economic growth in financial and professional services at local, national, and international levels will create jobs, attract investment, and support businesses across communities and the country.
 - [Leading Sustainable Environment](#) — We have a responsibility to ensure that we act as a leader on environmental sustainability and strive to enhance it in all aspects of how we work. Climate action, resilience, air quality, and sustainability are all facets of ambitious targets for the entire City to be net zero by 2040.
 - [Flourishing Public Spaces](#) — From our markets and cultural icons, such as the Barbican, to our world-famous bridges and amazing green spaces, we are stewards of unique national assets. Major capital investment into our civic fabric will secure flourishing public spaces, enabling a more successful London overall.
14. Though this statement principally supports our ambition to Provide Excellent Services, all six outcomes are interlinked and delivered through activities across the organisation and in partnership with our stakeholders to ensure impactful delivery of services.

People Strategy 2024-2029

15. Launched in parallel with our Corporate Plan, our [People Strategy 2024-2029](#) works to enable the City Corporation to become a world-class organisation. It does so by creating a culture that encourages excellent performance and embeds equality, equity, diversity, inclusion, and health and safety in everything we do.
16. Our People Strategy emphasizes a key theme of *‘My Wellbeing and Belonging’* where we outline our work to ensure our people feel physically and psychologically. It outlines specific measures to support our staff in this regard which include but not limited to:

- Introduce an anonymous HR reporting system and process to investigate and resolve employee complaints
- Research, benchmark and implement a holistic and proactive wellbeing offer to create consistent conditions for our people to flourish
- Undertake an annual employee survey, creating collective and individual action plans and connecting these directly to future year people strategy initiatives.

Our People, Our Policies and Our Commitments

17. Underpinning our People Strategy, the City Corporation has a suite of policies, codes of conduct and adopted principles that set out how the organisation makes sure that people are working legally, that everyone is treated fairly and with dignity, and that people conduct themselves appropriately.
18. These policies and processes are managed and overseen by the People and Human Resources Department and guidance is provided to all recruiting managers to ensure these checks are carried out effectively.
19. They represent an initial measure of safeguarding against the City Corporation employing any individual that has been illegally trafficked and or is being forced to work against their will – they include:
 - **Recruitment Policy:** The City Corporation enforces a strict recruitment policy, including mandatory 'right to work in the UK' checks for all employees. Employment offers are conditional on satisfactory completion of these checks. For employees on a visa or work permit, continued employment requires proof of ongoing right to live and work in the UK. These processes, overseen by the People and Human Resources Department, are designed to prevent the illegal employment of trafficked or coerced individuals.
 - **Whistleblowing Policy:** The City Corporation's Whistleblowing Policy applies to all staff, offering clear channels to raise serious concerns without fear of reprisal. This includes reporting potential instances of modern slavery or other forms of abuse and coercion. Staff are informed of this policy through induction training and the staff intranet.
 - **Employee Assistance Programme:** The City Corporation has an Employee Assistance Programme, which operates 24/7 for 365 days of the year, to provide staff and their partner or a family member confidential support on a wide range of work and personal issues which may include cases of modern slavery.
 - **Learning and Development Programs:** People and Human Resources ensures easy access to HR policies via the Employee Handbook, HR Topics pages, Managers' Guide, and New Starters' Resource on the intranet. Changes or new policies are communicated

through training workshops, e-learning, team meetings, and staff/manager news updates. The City Corporation also offers a one-hour e-learning course on modern slavery to raise awareness and help staff and Members identify and report concerns.

- **Our Living Wage Commitment:** The City Corporation is proud to be an accredited Living Wage employer. This commits us to paying at least the Living Wage to all staff, contractors and subcontractors according to the parameters set by the Living Wage Foundation. The City Corporation also goes one step further by paying the Living Wage to all apprentices and interns, as well as any person working under any of our contracts for two or more hours.
- **Codes of Conduct:** Our success depends on public trust, so all staff and elected representatives must uphold the highest standards of conduct and integrity, including adherence to the Nolan Principles. The City Corporation's 100 Common Councilmen and 25 Aldermen, known as 'Members,' represent public interests and follow the City Corporation's Code of Conduct.

Similarly, employees must follow the Employee Code of Conduct, which includes anti-corruption measures and promotes fairness and equality. Employees, suppliers, and stakeholders are encouraged to report serious concerns, which are addressed under the Whistleblowing or Complaints Policy, the Public Interest Disclosure Act, the Human Rights Act, and, when relevant, the Anti-Fraud and Corruption Strategy.

Governance & Accountability

20. The City of London Corporation operates under a historic and distinct governance system. Corporate oversight and governance are principally conducted through a committee system, each responsible for oversight and accountability for given remits. Meanwhile, the City Corporation's Town Clerk and Chief Executive, with respective Chief Officers, oversee day-to-day operations and delivery.
21. The primary Member-led bodies with responsibility for services which work towards preventing modern slavery are as follows:
 - **Court of Common Council** — With 100 elected Common Councillors and 25 Alderman, the Court of Common Council serves as the principal decision-making body.
 - **Policy and Resources Committee** — Oversees governance and considering matters of policy and strategic importance to the City of London Corporation including matters referred to it by other Committees and/or Chief Officers. It directs economic development initiatives and promotes the City of London as a global financial hub.

- **City of London Police Authority Board** — Delegated by the Court of Common Council, the Board ensures the City of London Police operates effectively, holds the Commissioner accountable, and sets priorities that enhance community safety and protection.
- **Community & Children's Services Committee** — Manages Children's and Adults' Services, Education, and Social Services, overseeing care and support to promote the safety and well-being of residents and addressing issues related to safeguarding and care.
- **Corporate Services Committee** — Oversees personnel and staffing for the City of London Corporation, including all graded and non-graded employees, employees on the professional payrolls, staff, and including casual workers, across Corporation departments and Institutions. They ensure employment practices support the well-being of staff and uphold best practice.
- **Licensing Committee** — This Committee manages the City of London's licensing under the Licensing Act 2003 with several key objectives, including: preventing crime and disorder, ensuring public safety, preventing public nuisance, and protecting children from harm.

Continuous Improvement and Progress

22. A Corporate Plan and People Strategy have been launched – each with clear outcomes designed to embed equality, equity, diversity, inclusion across our organisation and enable impactful delivery of services.
23. In 2023, an internal review was conducted to ascertain how we can improve on our efforts to combat modern slavery. Recommendations have been taken forward to relevant Department leads and incorporated within this statement.
24. The Deputy Town Clerk (DTC) has been put forward by the Town Clerk's Executive Leadership Board as Corporate Lead. for the Corporation's Modern Slavery Statement, to be supported by a Modern Slavery Strategic Lead, to help coordinate delivery of our Modern Slavery Statement. This will give corporate oversight and support in the publication of our Modern Slavery Statement commitments.
25. This statement is a product of continued collaboration through members of the CoLC Modern Slavery Working Group.

Part 2: Our Jurisdiction

26. This Section outlines how the City Corporation minimizes the risk of modern slavery occurring in the City of London and on City Corporation property, referring any victims to the help they need, ensuring any perpetrators are brought to justice and helping to identify modern slavery in any place the City Corporation has a presence.

The Safer City Partnership Board

27. The City Corporation takes a collaborative approach across all our service departments and multi-agency partners to ensure that comprehensive support is available to protect children, families, and adults from harm and exploitation.

28. Much of this comes together through the [Safer City Partnership Board](#) – the statutory community safety partnership for the City of London. It brings together statutory agencies, known as the Responsible Authorities, and invited and co-opted participants with the role of keeping the Square Mile safe. The Responsible Authorities are as follows:

Responsible Authorities (Statutory Members)

- The City of London Corporation
- The City of London Police
- London Fire Brigade
- NHS North East London Integrated Care Board
- The National Probation Service – London

Invited and co-opted participants

- British Transport Police
- London Ambulance Service
- East London Foundation Trust
- The Guinness Partnership
- City and Hackney Public Health
- City and Hackney safeguarding Adults
- City and Hackney safeguarding children
- Victim Support
- City of London Crime Prevention Association
- Safer Business Network
- City of London Business Improvement Districts

The City of London Police (CoLP)

29. The City of London Police's action plan on Modern Slavery and Organised Immigration Crime uses a four-pronged approach based on **protection, preparation, prevention** and **pursuit**:

- **Protection** focuses on identifying and safeguarding victims. This includes providing support services, such as shelter and medical care, and connecting victims to the National Referral Mechanism (NRM). The police work closely with other agencies to remove individuals from harmful situations and prevent further exploitation.
 - **Preparation** involves training officers to recognise signs of modern slavery and exploitation. The plan also strengthens partnerships with local authorities, businesses, and other organisations to enhance intelligence gathering and improve the police's ability to respond effectively to these crimes.
 - **Prevention** aims to reduce the occurrence of these crimes by raising public awareness and working with businesses to prevent exploitation within supply chains. Additionally, the police collaborate with at-risk communities to provide support and create a hostile environment for organised crime groups (OCGs).
 - **Pursuit** focuses on investigating, prosecuting, and disrupting offenders and OCGs involved in modern slavery and organised immigration crime. This includes targeting the financial operations of criminal networks and working with national and international partners to dismantle these organisations.
- 30.** Due to the nature of the crime, many victims are hidden out of sight, may not know they are victims, and/or may not present as a victim initially. Outside of exploring the data of those victims managed under National Referral Mechanism or direct reports into Police it difficult to accurately quantify the true scale of this crime. Beyond those sources mentioned there is no definitive data source or method to accurately capture the number of victims in the UK, including the Square Mile, therefore there is a high reliance on the creation of opportunities for generation of community and wider intelligence. CoLP are committed resources to assist in developing intelligence in this way to better understand the threat , harm and risk picture within the Square Mile.
- 31.** The City of London Police are focused on continuous improvement of data quality recorded, specifically around nationality of victims and suspects, location of offence and dates of exploitation to assist in generating opportunities and activity for prevention and pursuit of offenders. This includes seeking to gain licenses for CoLP for the Traffik Analysis Hub - run by [Stop the Traffik](#) - to develop our overall intelligence picture locally, regionally and nationally.
- 32.** In addition, the CoLP supports the Modern Slavery and Organised Immigration Crime (MSOIC) Programme, which focuses on identifying and protecting victims, preventing reoffending, disrupting criminal activities, and breaking the business models of Organised Crime Gangs (OCGs).

The Department of Community and Children's Services (DCCS)

33. DCCS has a wide remit to provide care and support to the 8,600 residential and 614,500 worker population of the City of London. Within DCCS, the People's Department provides comprehensive, consent-based and statutory safeguarding services for all City residents – covering Adult's Social Care, Children's Social Care and Early Help, Homelessness and Rough Sleeping, and Safeguarding & Quality Assurance.
34. Their work is guided by statutory regulations and legislation. For modern slavery, this includes the [Modern Slavery Act 2015](#) and its accompanying statutory guidance. This framework is further supported by broader safeguarding laws, including the [Children Act 2004](#), [Care Act 2014](#), and the [Homelessness Code of Guidance for local authorities](#). Plus wider multi-agency partnership safeguarding strategies such as the [CHSAB Strategy 2020-2025](#).
35. When significant harm or modern slavery is identified, the department takes immediate action to remove individuals from danger, safeguard them, and provide services to address trauma and prevent recurrence. The department refers cases of exploitation and trafficking to the [National Referral Mechanism \(NRM\)](#) through our dedicated Single Point of Contact.
36. This response is coordinated with partner agencies to create a robust support network around victims, providing immediate support, including emergency accommodation, and raising awareness among partners and staff to recognise and act on indicators of exploitation. In all cases, the safety of victims pursuing prosecution is prioritised, recognising the risks posed by exploiters.
37. The [Multi-Agency Child Exploitation \(MACE\) Group](#), chaired by the Head of Children's Social Care and attended by multi-agency partners, meets regularly to monitor issues such as criminal and sexual exploitation, trafficking, gangs, county lines, and modern slavery. This group ensures that trends are understood, and appropriate responses are in place to support victims and disrupt exploiters. Additionally, street-based outreach services provide direct, location-based support to homeless individuals, offering immediate advice and referrals to services.
38. [City Corporation Early Help](#) services are readily available to children and families to address emerging needs and prevent the escalation of vulnerabilities. This includes a universal youth service that encourages participation in extracurricular activities, reduces social isolation, and provides safe community spaces for children.
39. The City Corporation also has a dedicated commissioning team within the Community & Children's Services department, particularly for vulnerable young people, such as care leavers, and vulnerable adults. These services are regularly monitored to ensure safeguarding requirements are met. New services are commissioned using the City

Corporation's minimum safeguarding standards, based on the expectations set by [The City & Hackney Safeguarding Children Partnership \(CHSCP\)](#). Due diligence procedures include Disclosure and Barring Service (DBS) checks, and reviews of safeguarding policies, procedures, and complaints, with providers' ability to meet these standards tested during the procurement process.

Port Health and Public Protection (PHPP)

40. PHPP teams provide comprehensive and effective environmental health, trading standards, air quality and licensing services for the City of London, ensuring that, through monitoring, regulation and enforcement, City residents and businesses can enjoy an environment and services which are, so far as possible, safe and without risks to their health or welfare.
41. As per of their core duties, Public Protection officers frequently visit sites in the Square Mile posing risks of modern slavery and are vigilant in observing and reporting any suspicious circumstances.
42. Officers work closely with the City of London Police, Border Force, other external services – such as the Licensing Liaison Partnership - and other City Corporation services. Together, they collaborate on issues related to exploitation and modern slavery, with ongoing efforts focused on addressing concerns at specific locations.

Supporting Our Wider Community

43. [City Bridge Foundation](#) ('CBF' or 'the Charity') was established over 900 years ago and now manages and maintains five of London's city Bridges, at no cost to the taxpayer. They are powered through property and financial investments, initially supported and funded by medieval Londoners to maintain the first stone London Bridge. Funds surplus to the Bridges' needs are distributed each year to organisations that are working for a fairer, greener capital — via our funding team.
44. The City Corporation has a wider influence within surrounding boroughs, Greater London, the UK and further afield. We are committed to work together to ensure our approach to modern slavery is shared beyond our immediate jurisdiction.
45. Through our charitable funding, last year the charity provided £688,000 in grants specifically aimed at addressing modern slavery.
46. The City Corporation, acting by the Court of Common Council, is the charity trustee of CBF and carries out its functions as trustee in accordance with the City Corporation's internal governance framework, including through authority delegated to the CBF Board and its Committees, and to officers.

47. CBF's focus on Equity, Diversity, and Inclusion (EDI) supports initiatives that address conditions leading to exploitation and modern-day slavery. This includes funding and support for marginalized groups and those vulnerable to human trafficking. By promoting ethical treatment in supply chains and providing long-term, flexible finance for social change, CBF actively contributes to combatting modern-day slavery.
48. The Charity's vision, outcomes and values are set out in its overarching strategy 'Bridging London'. The vision is for London and Londoners to be truly connected. CBF aims to address the systemic causes that lead to modern slavery by supporting vulnerable populations, through its convening power and advocacy, and through collaborations and partnerships.
49. CBF will continue to evaluate its influence and collaborate with other funders and stakeholders to effectively tackle modern-day slavery.
50. [Heart of the City](#) runs a responsible business programme specifically designed for Small and Medium-sized Enterprises based in the UK to become a force for good. With the City of London Corporation having helped establish and fund Heart of the City, both share a commitment to fostering a sustainable and ethical business environment.
51. Focusing on the practical, its events, online resources/templates and network are designed to support those companies new to responsible business with complex issues, such as tackling modern slavery. Heart of the City's network of contributor companies has responsible business expertise and resource in-house and they provide foundation members with support, resources and guidance.

Continuous Improvement and Progress

52. The City of London Police, and the City of London Corporation more widely, continues to develop partnerships across the community and within policing to improve the identification and response to modern slavery.
53. Internal Service Development Plans, updated quarterly, drive practice improvements to enhance safeguarding responses, while the Children's Safeguarding Partnership and City and Hackney Adult's Safeguarding Board monitor and improve multi-agency safeguarding efforts.
54. In addition, regular performance monitoring and statutory reporting continue to ensure that services are delivered at the right time to meet the needs of City residents. These ongoing quality assurance measures, including practice reviews, observation, management oversight, and sign-off, monitor the day-to-day practice, impact, and user experience of our services.
55. Recognising the importance of appropriate training, a range of modern slavery, exploitation and human trafficking training is provided to workers in People's Services through our commissioned training providers.

- 56.** For the City of London Police, this includes enhanced training for officers and staff around spotting the signs of exploitation, with a focus on areas which have limited information and/or intelligence, such as sexual and labour exploitation. This includes:
- All front-line officers and custody staff have now received modern slavery training inputs
 - 14 officers have completed the four-day modern slavery investigator course
 - 17 officers have completed the specialist modern slavery victim liaison course
 - Staff from Learning and development have attended an MSOIC train the trainer course and the next cycle of vulnerability training in force will focus on MSOIC and delivered to all staff
 - And new guidance has been issued for officers around a uniform way to record NRMs on across record systems at the City of London Police.
- 57.** To ensure clear records across our services, Children’s and Adults’ Services operate a clear duty system to respond immediately to safety concerns, supplemented by an out-of-hours service. Here, Children’s Social Care and Early Help and Adult’s Social Care utilise the Mosaic ‘Warnings’ system, creating a red alert on the person summary page to notify any who access the record that there are warnings in place which indicate risk and high vulnerability across our service records.
- 58.** Children’s Social Care and the City of London Police are operating a collaborative project which ensures any child stopped and searched is seen through a safeguarding lens and accesses early, supportive, intervention, that diverts from risks and harm.
- 59.** CBF is expanding its responsible business practices to create a more positive impact by adding new roles focused on EDI and Climate Action. These roles will ensure a commitment to social justice, fostering an equitable, inclusive, and diverse environment that promotes ethical treatment in supply chains and works to prevent exploitation and forced labour.

Part 3: Our Supply Chains

- 60.** The City Corporation spends around £151 million annually on goods and services, with an additional £292 million allocated to construction works. These contracts support a wide range of services across the City Corporation and its institutions, including the Barbican Centre, City of London Police, and City Bridge Foundation.
- 61.** This Section outlines how the City Corporation is using responsible procurement and contract management due diligence procedures to minimise risks of modern slavery taking place within our domestic and global supply chains.

Our Domestic Supply Chains

62. The highest risks of modern slavery in our UK supply chain are found in entry-level roles across construction, security, waste management, cleaning, laundering, food harvesting, processing, and care industries—sectors typically filled by agency, seasonal, and migrant workers with low skill levels or without formal UK qualifications. Although not necessarily defined in the same way, the City Corporation recognises that those in the latter industries can often operate as part of the gig economy.

Our Global Supply Chains

63. Globally, the greatest risks, particularly forced and child labour, are linked to the production of electronics, textiles, agricultural commodities, and construction materials. Conflict minerals like gold, tin, tantalum, tungsten, lithium, cobalt, copper, and nickel—used in electronics and electric vehicles—are also a significant concern.

The Commercial, Change and Portfolio Management Team

64. The Commercial, Change, and Portfolio Management team oversees centralised and responsible procurement for contracts over £100,000, focusing on supplies, services, and works. This team leads the City Corporation's efforts to tackle modern slavery in supply chains, working with stakeholders and contract managers to mitigate risks and ensure best practices.

65. They monitor supplier performance and incorporate modern slavery and human rights safeguards throughout every stage of procurement. The team now includes an Impact and Reporting function to measure and communicate the value of investments, improving data and transparency.

Training and Development

66. All commercial services personnel receive responsible procurement induction and training from the Corporation's Responsible Procurement Manager. Responsible Procurement is also a module in our Commercial Academy, an e-learning course accessible to all City Corporation officers. This year (May – June 2024), a 'refresh' series was delivered, featuring sessions on each responsible procurement commitment with practical steps for implementation. The series was recorded and is available to officers.

67. Additionally, a toolkit has been developed for each of the six responsible procurement commitments. It explains the importance of each commitment, outlines actions for each stage of the commercial lifecycle (pre-procurement, procurement, and contract management), and provides relevant contacts for reporting.

Procurement Processes

68. Before starting a procurement exercise, our buying team assists departmental stakeholders in exploring procurement options. All relevant suppliers wishing to tender for City Corporation contracts must provide evidence of compliance with the Modern Slavery Act 2015 to be eligible.
69. Procurement frameworks, which include pre-approved suppliers with agreed terms and conditions for specific goods, works, or services, are another available option. As part of due diligence, our buying officers ensure that framework providers comply with the Modern Slavery Act, and address any gaps if necessary. For high-risk categories of spend, officers must include specific wording in specifications requiring suppliers to conduct due diligence or be prepared to do so upon request. The Human Rights toolkit provides specification wording and questions for officers to include in their tenders.

Contract Monitoring

70. The City Corporation has made ambitious commitments to reducing carbon emissions through sustainable procurement, while also ensuring that the transition to a low-carbon economy does not marginalize people or violate human rights. To address this, the City Corporation has recruited temporary resources to specifically review 40 of our suppliers through a Just Transition lens and identify practical actions for both this year and the five-year action plan.
71. A framework, based on the [SDGs World Benchmarking Alliance Transition Methodology](#), and [International Labour Standards](#), was developed, followed by a risk assessment. For suppliers identified as high or medium risk, an action plan will be created, which may include supplier training, workshops, updates to the Human Rights toolkit, and revisions to procurement specifications and tender questions, as well as internal officer training.
72. To focus on modern slavery risks, we assessed the modern slavery statements of 40 of our top suppliers using the [Government's Modern Slavery Assessment Tool \(MSAT\)](#). Scores ranged from 31/156 to 151/156, with an average of 66/156. In the coming year, we will engage with suppliers to improve their approach to modern slavery through category training, one-on-one conversations, and collaboration with commercial leads.
73. Additionally, in early 2024, the Responsible Procurement team implemented a Modern Slavery in the Supply Chain Due Diligence Report, requiring suppliers to detail their due diligence efforts and planned actions for the specific financial year. This report has been used for major facilities management and minor works contracts.
74. A 'Performance Scorecard' is also available to contract managers to ensure a standardized and robust approach to monitoring, gathering evidence, and addressing risks or performance issues. One of the ten elements covered by the Scorecard is ethical sourcing, particularly supplier compliance with the Modern Slavery Act.

Continuous Improvement and Progress

75. The City Corporation helped establish and is an active member of the London Responsible Procurement Network (LRPN). This group of public sector representatives meets regularly to exchange best practices and develop strategies for social value, sustainability, and ethical sourcing. The group focuses on modern slavery, sharing interventions and learning how to address it in public sector supply chains. Their goal is to use their collective influence to reduce modern slavery and human rights risks, with efforts directed at improving training and due diligence.
76. A comprehensive procurement governance review is underway, starting in summer 2024 and expected to run into 2025. This review will assess governance, practices, spending behaviours, and roles to improve efficiency and compliance. The review aims to strengthen the City Corporation's due diligence on human rights and modern slavery, with updates to procurement templates for high-risk areas. Expected outcomes include:
- A risk-assessed compliance audit
 - An improvement plan for procurement and contract management
 - A commercial assurance framework with updated data and reporting requirements
 - A corporate capability assessment and training plan
 - An updated Procurement Code
 - Revised officer-level governance proposals
77. Officers are developing a new e-procurement system following the introduction of the [Procurement Act 2023](#), featuring contract management and alert functions. This system will integrate the current commercial scorecard and may be updated following the review. Led by the City Corporation's Strategic Contract Management Lead, this project will enhance visibility on responsible procurement and modern slavery issues.
78. The temporary position on secondment from Westminster City Council, 'Responsible Procurement Officer – Just Transition', will engage with suppliers to improve their approach to modern slavery. The engagement will include category training, 1-2-1 conversations, and engagement with the commercial leads.
79. In late 2023, the City Corporation's Commercial Service underwent an audit against the ISO 20400 standard for Sustainable Procurement. This audit reviewed our procurement policy, toolkits, templates, and the application of these resources by buyers and stakeholders. The City Corporation scored 2.73, which is above average for a first-time assessment. The standard emphasizes managing risks, addressing adverse sustainability impacts through due diligence, and promoting decent work and ethical behaviour as part of sustainable procurement.

80. Additionally, the City Corporation was a founding partner for [Action Sustainability's Practical Procurement Guidance](#) aimed at combating modern slavery in solar PV supply chains. While this guidance focuses on solar panels, it is also applicable to other technologies with similar supply chain risks. We have shared this guidance through our category boards and climate action strategy team.

Policies and Commitments

81. The City Corporation has a suite of policies, toolkits and reporting commitments to promote responsible business and ensure we minimise risks of modern slavery taking place within our domestic and global supply chains.

- **City Corporation Responsible Procurement Policy:** Our [Responsible Procurement Policy](#) aims to deliver optimal value while enhancing the lives of those within our supply chain. It is founded on three pillars: social value, environmental sustainability, and ethical sourcing. This policy underscores our commitment to addressing human and labour rights violations, including modern slavery.

Applicable to all contracts awarded by the City Corporation, it requires action from officers with purchasing responsibilities and suppliers providing goods, services or works contracts. The City Corporation has six Responsible Procurement commitments, which includes a specific commitment to “*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.*”

- **Human Rights Toolkit:** Mitigating modern slavery and ensuring human rights in our supply chain are integral to our six responsible procurement commitments. Each commitment is supported by a dedicated toolkit that helps officers understand the risks, statutory duties, and considerations at each stage of the commercial lifecycle, including escalation procedures. The Human Rights toolkit provides links to valuable external resources, such as the Supply Chain Sustainability School and Government Commercial Colleges e-learning suite.
- **Oversight and Reporting:** We publish an annual report to assess the impact of our supply chain against our six responsible procurement commitments. The [Responsible Procurement Impact Report for the financial year 2023-24](#) is available on our website. Additionally, we will publish all six responsible procurement toolkits alongside our Responsible Procurement Policy on our website. These toolkits explain the importance of each commitment, outline steps for advancement, and set expectations for suppliers. Our

aim in publishing these resources is to enhance supplier awareness, improve bid quality, and foster more meaningful discussions with our current suppliers.

- **Climate Action Strategy:** [Our Climate Action Strategy 2021–2027](#) ensures a Just Transition for the workforce, aiming to create decent work and quality jobs while safeguarding workers' rights and livelihoods.
- **Procurement Code:** Rules 45 (Responsible Procurement) and 50 (Modern Slavery and Human Rights) of our [Procurement Code](#) require officers to minimize ethical sourcing risks and uphold human rights within our supply chain.
- **Contract Terms:** Our standard terms and conditions mandate contractor compliance with the Modern Slavery Act 2015 and reserve the right to terminate contracts for non-compliance.
- **Fairtrade Commitment:** We adhere to [a Fairtrade Resolution](#), using Fairtrade products exclusively in the Guildhall Club and for City Corporation Hospitality Events, including 100% of products such as tea, coffee, sugar, bananas, and chocolate.
- **UN Global Compact:** As a signatory to the [UN Global Compact](#), we integrate considerations for workers, communities, and the environment into our business decisions. Our commitments include Goal 8 (Decent Work and Economic Growth), ensuring International Labour Organisation standards are met, and Goal 12 (Responsible Consumption and Production), focusing on reducing waste and promoting reuse to mitigate modern slavery risks in mining and materials critical to climate action.

This statement was approved by the City Corporation's Court of Common Council on **[DATE APPROVED]**

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2024-2029 Modern Slavery Statement Summary



Introduction

The City of London Corporation acknowledges its responsibility to identify and eradicate modern slavery within its operations.

Building on our previous statements, this document outlines the actions we have taken – *and continue to take* – to safeguard against any form of modern slavery occurring within **our organisation**, across **our jurisdiction**, and throughout **our supply chains**.

It is made pursuant to Section 54 of **the Modern Slavery Act 2015** ('the Act'). Although the City Corporation is not classified as a relevant commercial organisation under Section 54 of the Act, we made a clear commitment to publish a Modern Slavery Statement to align with our dedication to responsible business.

Part 1: Our Organisation

How we prioritise our commitment at the highest level, protecting and educating staff and taking dedicated action and collaborating across the City Corporation to combat modern slavery.

Core Policy Framework - Our commitment to ensure that the City of London offers the best place to live, work, learn, and explore is guided by our core policy framework of:

- **Our Corporate Plan 2024-2029:** All six outcomes of our Corporate Plan are and, through activities undertaken across the organisation and in partnership with our stakeholders, ensure impactful delivery of services.
- **Our People Strategy 2024-2029:** Working in parallel with our Corporate Plan, our People Strategy works to enable the City Corporation to become a world-class organisation by creating a culture that encourages excellent performance and embeds equality, equity, diversity, inclusion, and health and safety in everything we do.

Established Process, Policies and Commitments - We have committed to tackling modern slavery through an up-to-date suite of HR policies, including:

- Robust Committee Governance
- Recruitment Policy
- Whistleblowing Policy and Employee Assistance Programme
- Learning and Development Programmes
- Our Living Wage Commitment
- Codes of Conduct

Key Teams - The Town Clerk's Department, The People & Human Resources Department, Comptroller & City Solicitor's Department, Corporate Strategy & Performance.

Continuous Improvement and Progress.

- We have launched our Corporate Plan 2024-2029 and People Strategy 2024-2029 – each with clear outcomes to embed equality, equity, diversity, inclusion across our organisation with impactful delivery of services.
- We have conducted an internal review to ascertain how we can improve on our efforts to combat modern slavery. Recommendations have been taken forward to relevant Department leads and incorporated within this statement.
- To give corporate oversight, the Deputy Town Clerk has been appointed as Corporate Lead.
- We have continued collaboration through members of the CoLC Modern Slavery Working Group.

Part 2: Our Jurisdiction

How we minimise the risk of modern slavery occurring in any place the City Corporation has a presence, referring any victims to the help they need, and ensuring perpetrators are brought to justice.

Core Policy Framework - To combat modern slavery in our jurisdiction, we operate a clear approach outlined in:

- **Our City of London Policing Plan:** Outlines how policing will be delivered and sets out our policing priorities, whilst maintaining a commitment to our values of integrity, compassion and professionalism and the principles of the Police Code of Ethics.
- **National Legislation and Guidance:** Modern Slavery Act 2015, Modern Slavery Statutory Guidance, Children Act 2004, Care Act 2014, Homelessness Code of Guidance for local authorities, Licensing Act 2003, National Referral Mechanism (NRM) 2009.

Key Teams - City of London Police (CoLP), Department of Community & Children's Services (DCCS), Port Health & Public Protection (PHPP).

Continuous Improvement and Progress

- We conduct Internal Service Development Plans and ongoing quality assurance measures (including practice reviews, observation, management oversight, and sign-off) monitor the day-to-day practice, impact, and user experience of services and enhance safeguarding response.
- We have modern slavery, exploitation and human trafficking training available to officers and staff through our commissioned training providers.
- We have established arrangements to monitor the successful implementation of the Modern Slavery and Human Trafficking '4P' Plan.
- The CoLP continue to develop partnerships across the community and within policing to improve the identification and response to modern slavery.
- The Children's Social Care and the City of London Police have joined forces to ensure any child stopped and searched is seen through a safeguarding lens and accesses early, supportive, intervention, that diverts from risks and harm.

Established Process, Policies and Commitments - We ensure a collaborative and robust approach to modern slavery in our jurisdiction through:

- [The Safer City Partnership Board](#)
- [The Serious Organised Crime Board](#)
- [Our Multi-Agency Child Exploitation \(MACE\) Group](#)
- [City Corporation Early Help services](#)
- [The City & Hackney Safeguarding Children Board \(CHSCB\)](#)
- [CBF Bridging London Strategy](#)

Part 3: Our Supply Chains

How we use responsible procurement, contract management, and due diligence procedures to minimise risks of modern slavery taking place within our supply chains.

Core Policy Framework - Our commitment to responsible business is outlined and guided by our:

- **Responsible Procurement Policy:** Founded on three pillars: social value, environmental sustainability, and ethical sourcing. This policy underscores our commitment to addressing human and labour rights violations, including modern slavery.
- **Climate Action Strategy 2021-2027:** Ensures a Just Transition for the workforce, aiming to create decent work and quality jobs while safeguarding workers' rights and livelihoods.

Established Process, Policies and Commitments - We use robust processes, commitments and contract management to minimise the risk of modern slavery in our supply chains, including –

- Our Procurement Code: Rules 45 and 50
- Clear Contract Terms compliant with the Modern Slavery Act
- A dedicated Human Rights Toolkit for staff
- Annual Procurement Impact Reports
- Our City Corporation Fairtrade Resolution
- UN Global Compact signatory

Key Teams - The Chamberlain's Department - Commercial, Change, & Portfolio Management team.

Continuous Improvement and Progress

- The City Corporation has joined the newly formed London Responsible Procurement Network (LRPN) working group dedicated to modern slavery.
- The Commercial, Change, and Portfolio Management team has been created to better assess investment impact.
- A procurement governance review of the Commercial Service has begun to strengthen human rights and modern slavery due diligence throughout the commercial lifecycle.
- An Impact and Reporting function has been created to enhance transparency and measure the benefits of third-party spending and project investments, particularly in high-risk areas.
- An e-procurement system compliant with the new Procurement Act 2024 to provide the functionality to manage contracts through an e-system with alerts.
- The City Corporation will publish all six of our responsible procurement toolkits on our website alongside our Responsible Procurement Policy.
- Successful audit against the ISO 20400 standard for Sustainable Procurement.



City of London Corporation Modern Slavery Statement

1. This Modern Slavery Statement, covering November 2018 - June 2019, is made in response to s.54 of the Modern Slavery Act 2015 ("the Act"). It sets out the steps that the City of London Corporation "City Corporation" has taken and is continuing to take to ensure that modern slavery is not taking place within our business, within the Square Mile or within our supply chains.
2. For the purposes of this Statement and associated Policy, the term 'Modern Slavery' encompasses slavery, servitude, human trafficking, forced or compulsory labour and child labour.
3. The City Corporation is not a relevant commercial organisation as defined by section 54 of the Act. However, it will comply with its annual reporting requirements on a voluntary basis in the interest of due diligence and transparency, and to appropriately reflect the City Corporation's strong commitment to responsible business principles.
4. This Modern Slavery Statement is divided into five sections:
 - i. **Our Organisation** -The City Corporation's approach to tackling modern slavery. This overarching commitment is supported at the highest level and inter-departmental collaboration is used to ensure a harmonised and effective approach.
 - ii. **Our People** - Helping to protect our own employees based at any City Corporation location from becoming victims of modern slavery through fair recruitment practise, pay and conditions, and having support mechanisms in place such as access to whistleblowing, and an employee assistance programme.
 - iii. **Our Jurisdiction** - Creating conditions that minimise the risk of modern slavery occurring within the Square Mile, identifying modern slavery that does occur within our geographical jurisdiction, referring any victims on to the help and support they need and ensuring any perpetrators of this crime are brought to justice.
 - iv. **Our Wider Community** - Using our influence to facilitate positive action on modern slavery amongst charitable organisations and our wider business community.
 - v. **Our Supply Chains** - Using responsible procurement and contract management due diligence procedures to minimise risks of modern slavery taking place within our domestic and global supply chains.
5. Within each of these five sections. the following aspects are described, as per the requirements of a modern slavery statement under s.54 of the Act:

- a. **Remits and relevant risks**- Within the remit of each department; identifying the people, places, trades and industries at highest risk of being associated with modern slavery.
- b. **Policies and commitments** - Overarching and department-specific policies and commitments to tackling modern slavery and associated human and labour rights abuses.
- c. **Existing interventions** -Actions already being undertaken to identify and deal with modern slavery and to minimise the risk of it occurring. This includes training & awareness programmes and due diligence procedures such as referrals, site visits & spot checks, contractual provisions and contract monitoring & management.
- d. **Continuous improvement** -Assessing the effectiveness of our current interventions, creating plans to bridge identified gaps, developing appropriate performance indicators, monitoring and reporting on progress.

i. Our organisation

a. Remit and relevant risks

- 6. The Square Mile is the historic centre of London and is home to the 'City' - financial and commercial heart of the UK. The City Corporation provides local government services for the Square Mile and supports and promotes the City as the world leader in international finance and business services. The organisation's responsibilities extend far beyond the City boundaries in that it also provides a host of additional facilities for the benefit of the nation, including air and sea ports, the Barbican and various open spaces.
- 7. The Bridge House Estate (BHE) is currently the 7th largest charity in the UK in terms of asset valuation: The City Corporation is its sole corporate trustee. The primary object of BHE is to maintain and support five bridges crossing the River Thames. A cy-près charity scheme of 1995 permits income surplus to that required for the bridges to be used for broader, and more general, charitable purposes within the Greater London area. This scheme enables the charity to work through its charitable funding arm, City Bridge Trust (CBT). CBT provides grants totalling around £20m per year towards charitable activity benefitting Greater London.
- 8. Heart of the City is a business-led charity, limited by guarantee and housed the City Corporation, which is its main funder and Treasurer.
- 9. The City of London Police is the territorial police force responsible for law enforcement within the City of London, with other specific remits nationally. The City of London Police is divided into four directorates: Crime Investigation, covering serious & organised crime, terrorism, acquisitive criminality and violent crime; Economic Crime, which looks at fraud; Intelligence and Information, responsible for coordination of intelligence and information management; and Uniform Policing, providing policing response and specialist skills and support both internally and to other police forces.
- 10. From an organisational perspective, it is recognised that modern slavery is a crime that is prevalent both within and outside of the UK, across many industries and as such it is a

risk that the City Corporation takes seriously. However, rather than this risk being looked at in isolation, modern slavery is managed alongside a range of other risks that must be dealt with as part of our business activities e.g. implementing responsible procurement, tackling serious and organised crime, safeguarding of children and vulnerable adults, health and safety in construction etc.

a. Policies and commitments:

11. The recently published Corporate Plan (2018-2023) sets out the priorities of the City Corporation as the governing body of the Square Mile, dedicated to a vibrant and thriving City, supporting a diverse and sustainable London within a globally successful UK. The following aims and outcomes within the Plan underpin the City Corporation's commitment to combatting human and labour rights abuses such as modern slavery:

11.1 Contribute to a flourishing society:

- People are safe and feel safe
- People enjoy good health and wellbeing
- People have equal opportunities to enrich their lives and reach their full potential

11.2 Support a thriving economy:

- Businesses are trusted and socially and environmentally responsible

12. The Responsible Business Strategy 2018-23: 'Towards a Sustainable Future' describes in more detail how the City Corporation intends to achieve the above aims and outcomes. This Strategy sets out the organisation's objective of creating positive impact and reducing negative impact across all its activities and decisions. More specifically the Strategy states the City Corporation's stance on advocating for human rights in its decision-making processes so that people are treated appropriately and with dignity. The Strategy also details its commitment to actively preventing fraud, corruption and bribery in its own operations and influencing supply chains and partners to do the same.

13. The following is the City Corporation's stand-alone Policy on modern slavery:

b. Existing interventions

14. Representatives from the City of London Police, the Barbican, City Procurement, Department for Community and Children's Services, Community Safety and Corporate Strategy and Performance Team came together in early 2018 to establish the City Corporation's inter-departmental Working Group on modern slavery.

15. The priority of the Working Group was to bring together all current action taking place to tackle modern slavery by the City Corporation to harmonise our approach and ensure that resources and lessons learned are shared across the City Corporation. This current modern Slavery Statement was developed based on this work.

c. Continuous improvement

16. The Working Group plans to invite representatives from other relevant departments to contribute their ideas going forward, including HR and Licensing. A network of 'Safeguarding Champions' is to be re-launched in the coming months, acting as departmental points of contact and channels for dissemination of key messages to and from the Working Group.
17. The next priority of the Working Group going forward is to identify any gaps or weaknesses and plan future interventions and areas for potential collaboration that could be used to continuously improve our approach. The principal areas identified so far are an increased number of internal and external training and awareness raising initiatives.
18. Specific continuous improvement plans are discussed more fully as part of the following sections covering Our People, Our Community and Our Supply Chain.

II. Our People

a. Remit and relevant risks

19. This section covers the City Corporation's **work** helping to protect our own employees from becoming victims of modern slavery. These City Corporation-wide efforts are led by our Human Resources Department.

b. Policies and commitments

20. Alongside the City Corporation's Modern Slavery Policy outlined in Section 1.b, the City Corporation has a series of policies, codes of conduct and adopted principles that set out how the organisation makes sure that people are working legally, that everyone is treated fairly and with dignity, and that people conduct themselves appropriately.
21. Recruitment Policy: The City Corporation operates a robust recruitment policy, including conducting 'right to work in the UK' checks for all employees. All offers of employment are conditional on these checks being completed to the organisation's satisfaction. Where an individual is working in the UK on a visa or work permit of a fixed term, the City Corporation requires the individual to provide proof of their continuing right to live and work in the UK before continuing their employment.
22. These processes are managed and overseen by our HR department and guidance is provided to all recruiting managers to ensure these checks are carried out effectively. They represent an initial measure of safeguarding against the City Corporation employing any individual that has been illegally trafficked and or is being forced to work against their will.
23. Whistleblowing Policy: The City Corporation's Whistleblowing Policy applies to all staff. It details the channels through which employees should raise serious concerns providing

assurance that there should be no fear of reprisals. Concerns regarding potential instances of modern slavery can be raised in this way alongside other forms of abuse and coercion staff may be experiencing or suspicious of. Staff are made aware of this Policy through various channels including during induction training and the staff intranet.

24. Codes of Conduct: Our continued success relies on the trust and confidence of the public and therefore all staff and elected representatives are expected to uphold the highest standards of personal conduct and integrity including a requirement for all staff to uphold the Nolan Principles on standards in public life.
25. There are 100 Common Councilmen and 25 Aldermen serving as elected representatives, collectively referred to as 'Members'. Members represent public interest and inform how the City Corporation should carry out its various activities. Members adhere to the City Corporation's Code of Conduct for Members.
26. Similarly, City Corporation employees must adhere to the City of London's Employee Code of Conduct. This incorporates requirements to abide by City of London anti-corruption measures and that all employees are treated with fairness and equality.
27. The Code also sets out the expectation that employees and other stakeholders including suppliers, who have serious concerns about the conduct of any aspect of the City Corporation's work to come forward and voice those concerns. It commits the organisation to treating any suspicion of wrongdoing seriously, with concerns reviewed and analysed in accordance with the Whistleblowing or Complaints Policy, considering the Public Interest Disclosure Act, the Human Rights Act and if appropriate the City Corporation's Anti-Fraud and Corruption Strategy.

c. Existing interventions

28. Policy implementation: The City Corporation strives to be an excellent employer with a modern suite of employment policies and procedures. Corporate HR ensures the effective management of policies. This includes routine reviews to be in compliance with legal and mandatory requirements, alignment to best practice, monitoring and enforcement oversight.
29. It is the responsibility of all managers across the organisation to put written policies and procedures into practice. Under the 'Managing People Policy', managers are primarily responsible for ensuring their consistent application so that all employees are managed in a fair and consistent manner. It is also important for Managers to support employees in understanding and interpreting policies correctly.
30. Corporate HR ensures the ready accessibility of its HR policies and procedures through the Employee Handbook, HR Topics pages, Managers' Guide and a New Starters' Resource page all of which are located on the intranet. In addition, the provision of a suite of training workshops/briefings, a-learning, team meetings and staff/manager news items are just some of the means of cascading either changes or new policies and procedures.
31. The City Corporation has an Employee Assistance Programme, which operates 24/7 for 365 days of the year, to provide staff and their partner or a family member confidential support on a wide range of work and personal issues which may include cases of modern

slavery.

32. Training: The City Corporation has made an e-learning course available to all staff and Members. This hour-long online modern slavery training aims to raise awareness of the issue and help staff recognise their role in identifying and reporting concerns.
33. Living Wage: The City Corporation is proud to be an accredited Living Wage employer. This commits us to paying at least the Living Wage to all staff, contractors and sub-contractors according to the parameters set by the Living Wage Foundation. The City Corporation also goes one step further by paying the Living Wage to all apprentices and interns.

d. Continuous improvement

34. The City Corporation has on-going commitment to train all managers as part of the organisation's Health and Wellbeing Strategy. The strategy has also included the roll out of Mental Health First Aiders within the departments. These roles are well placed as the potential first point of contact for employees who are experiencing any mental health issues or emotional distress, to identify potential signs of modern-day slavery.
35. The City Corporation is currently reviewing methods of monitoring payment of the Living Wage, along with the scope of the policy application. Any changes will be reported on as part of the next City Corporation modern slavery statement published in July 2019'.
36. Coinciding with the publication of this modern Slavery Statement, Chief Officers will encourage all staff to take a high-level version of the online modern slavery training. The number of staff that have undertaken this training will be used as a performance indicator of information dissemination going forward.

iii. Our Jurisdiction

a. Remit and relevant risks

37. This section covers the protection of the community of the Square Mile from modern slavery. It is the City Corporation's responsibility to create conditions that minimise the risk of modern slavery occurring, monitor the highest risk trades and industries to identify any instances of modern slavery that do occur within our geographical jurisdiction. Any cases of modern slavery identified in the City would need to be referred to the City of London Police and the City of London's Single Point of Contact (SPOC), the Safeguarding and Quality Assurance Service Manager. Support would be offered to victims of modern-day slavery through the Adult Social Care Team or Children's Social Care team. These services would then make a referral through to the National Referral Mechanism to support the victims of modern slavery and ensure any perpetrators of this crime are brought to justice. These interventions involve the Safer City Partnership (SCP), Community Safety team, Markets and Consumer Protection Department's Licensing team, the Department for Community and Children's Services Safeguarding and Quality Assurance team and the City of London Police.
38. The SCP brings together statutory and non-statutory representatives who aim to contribute towards keeping the City safe. Statutory partners include the City Corporation,

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City of London Police, London Fire Brigade, London Probation trust and the NHS Clinical Commissioning Group.

39. There is no typical victim of slavery. Victims are men, women and children of all ages, ethnicities and nationalities and cut across the population. However, it's normally more prevalent among the most vulnerable or within minority or socially excluded groups. Potential victims of human trafficking were reported from 116 different nationalities in 2017 according to the National Crime Agency's National Referral Mechanism statistics. Albanian, UK and Vietnamese nationals were the most commonly reported potential victims. 5,145 potential victims were submitted to the National Referral Mechanism in 2017, which was a 35% increase on 2016. In 2017, the National Referral Mechanism received 4714 referrals in England of which 2,464 potential victims of modern slavery cases were men, while 2247 were women, 2753 were adults and 1961 were children. The biggest increase in type of exploitation for adults is sexual exploitation and children is labour exploitation. Other vulnerable groups include, but are not limited to, people who are/ have been involved in illegal activities, those who do not have a right to remain in the UK, children who are fleeing their home countries and seek out refuge in the Square Mile.

40. People at the highest risk of being victims of modern slavery in the Square Mile include sex workers, street traders, people employed in the hospitality industry i.e. hotels and restaurants, cleaners, construction workers and those providing domestic and care services or personal health and beauty services.

41. The City of London Corporation has responsibilities for over 40 sites outside the Square Mile including air and sea ports, open spaces, schools, housing estates, markets and cultural attractions. In terms of the sections of this modern slavery statement that cover our responsibilities in these areas:

41.1. In terms of people within our workforce, the interventions described in 'Section ii: Our People' applies, no matter the location of the site

41.2. In terms of suppliers or contractors, the interventions described in 'Section v: Our Supply Chains' applies, no matter the location of the site or department

42. In terms of any other person, who is not an employee or supplier to the City Corporation, being identified to be at risk of, or of currently being a victim of modern slavery on one of our sites outside the Square Mile, or being identified by someone affiliated with one of these satellite sites, the relevant police force, and Border Force in the case of ports, should be informed as they would have jurisdiction in this geographical area and would deal with the matter as part of their own policing strategy and through the National Referral Mechanism.

b. Policies and commitments:

43. The Department for Community and Children's Service's has identified a representative who will be acting as the single point of contact (SPOC) for modern day slavery for the City Corporation. This role is currently being held by the Safeguarding and Quality Assurance Service Manager who supports referrals through to the National Referral Mechanism.

44. The Community Safety Team's commitment is to help keep all those who live, work or visit the Square Mile safe. The Team works closely with our communities to understand their

concerns and priorities and provide advice to help prevent people becoming a victim of crime and to promote awareness of how to report problems.

45. The City of London Police's Action Plan on Modern Slavery and Human Trafficking uses a four-pronged approach based on protection, preparation, prevention and pursuit. The actions are described in part c) below.

c. Existing interventions

46. **City of London Police:** Specific roles and responsibilities are delegated within the Force around training and intelligence and to deal with the victim(s), the suspect or organised crime groups and the subsequent investigation. The City of London Police's response to modern slavery is coordinated through the Force Lead, the Chief Inspector of Uniformed Policing - Custody and Response. The current Action Plan on Modern Slavery and Human Trafficking uses a '4 P's' approach:

- 46.1 **Protect.** This action includes close working with public bodies and private industry to identify vulnerabilities and improve the Force's target handling capability in response. Intelligence and information sharing is essential to this work, enabling all parties to, identify the threat and protect the economy and our communities:
- Promote awareness of the signs of modern slavery;
 - Develop victim centric processes; and
 - Collaborate with stakeholders and partners to identify early intervention opportunities.

The City of London Police form an essential part of the City Corporation's Working Group on Modern Slavery.

- 46.2 **Prepare:** This work includes developing positive relationships with law enforcement agencies and wider community, including the public, private and third sectors. The aim is to engage strategically and tactically to build specialist knowledge, enhance the Force's capability and effectiveness and to cut crime and protect the public:
- Intelligence picture to be regularly updated;
 - Roll out training to frontline officers to educate and promote awareness in recognising victims at the earliest opportunity;
 - Establish best practice regarding investigation of modern slavery offences; and
 - Educate and inform City of London Police staff and partners/stakeholders.
- As an example of recent work carried out as part of this action, train-the-trainer training was rolled out in Summer 2018 to City of London Police officers in order to facilitate knowledge as widely as possible on recognising the signs of modern slavery whether as part of the role of front office staff, a PC on patrol or a Detective executing a search warrant.

- 46.3 **Prevent:** This action encompasses the design and management of campaigns with partners to highlight the impact of the organised crime gang. These initiatives should deter individuals from committing organised crime and encourage people to report it. Creating a hostile operating environment for organised crime groups is essential. Conduct visits to perceived vulnerable premises; Promote convictions in media; Conduct prison visits; Promote use of orders for Slavery and Trafficking Prevention Orders.

The City of London (Col) Police take an active role in identifying victims of modern slavery and human trafficking within the Square Mile and within high risk industries, for example by speaking to sex workers in brothels in collaboration working with partner charities and also by visiting construction sites and providing inputs within the community to other areas considered to be more susceptible to this crime type such as within the hospitality trade.

- 46.4. **Pursue:** This includes arrests, seizures and criminal prosecutions. Work takes place alongside public, private and third sector professionals to disrupt organised criminals, their associates, business endeavours and way of life.
- Identify offenders involved in modern slavery and bring to justice;
 - Disruption of organised crime groups continuing to offend;
 - Establish strong and effective collaborations to tackle modern slavery.
47. **Department for Community and Children's Services (DCCS):** has a responsibility to safeguard children and adults in the City of London. This responsibility is in conjunction with other agencies, as set out in the 'Working Together to Safeguard Children' guide to inter-agency working to safeguard and promote the welfare of children published in July 2018. Further guidance is also available within the Pan London Safeguarding procedures for adults and children. The Joint City and Hackney Safeguarding Board for Adults and the corresponding Board for Children has oversight on the training and development of strategies on modern slavery, as does the Safer Community Partnership.
48. **Serious and Organised Crime (SAOC) Board:** The Board works to improve the collection, collation and analysis of data on modern slavery, including sexual and labour exploitation in order to understand and help mitigate the threat of these crimes.
49. **Public Protection and Environmental Health:** The City Corporation's Markets and Consumer Protection Department amongst other remits, is responsible for regulating most of the premises within the Square Mile. As part of the Department's everyday duties they conduct inspections e.g. to ensure health & safety or food safety, at sites that may pose a risk of being associated with modern slavery including massaging and special treatment premises, construction sites, hotels, restaurants and street trading stalls. The team forms part of the Safer City Partnership and Serious and Organised Crime Board and responds to requests from HM Revenue & Customs and Police requests to look out for certain activities they are suspicious of.

d. Continuous improvement

50. The City of London Police: The comprehensive interventions that form part of the Action Plan on Modern Slavery and Human Trafficking detailed in part c) above will continue to be rolled out over the coming year. The effectiveness of these measures will be monitored alongside other policing objectives as part of the Force's overall approach.
51. **The Department of Community and Children's Services:** It is currently working with safeguarding partners formally known as the local Safeguarding Board for both Children and Adults on the development of a 'Joint Strategy for Modern Day Slavery'. The City of London has been tasked by the Board to develop a Strategy on Modern Slavery that focuses on the demography and needs of the City. There will be a focus on raising awareness around

modern slavery across the City Corporation including through training. Resources and ideas from both organisations will be pooled and lessons learned from similar local authority initiatives will be drawn on to create a meaningful and effective joint approach.

52. **Serious and Organised Crime (SAOC) Board:** The SAOC Board has identified modern slavery as a high priority threat that can have devastating impacts. It provides an advisory function and reports into the Safer City's Partnership. The SAOC will continue to find effective ways of raising awareness about modern slavery and working in partnership with agencies that intercept and dismantle organised crime groups, preventing them from profiting from modern slavery and human trafficking. Improved procedures to share intelligence on organised crime groups will be developed with the eventual aim of preventing recruitment of vulnerable people into modern slavery.

53. **Community Safety:** Events aimed at raising awareness of modern slavery amongst City Corporation staff and City businesses will take place over the next year. These will be focused on helping delegates to recognise potential signs of modern slavery and to know what to do in such circumstances.

iv. **Our Wider Community**

a. **Remit and relevant risks**

54. This section covers the City Corporation's wider influence within surrounding boroughs, Greater London, the UK and further afield.

55. **City Bridge Trust:** The City Corporation plays a philanthropic role through the City Bridge Trust, which provides £20m per annum in grant funding across Greater London. The Trust supports work which reduces inequality and grows more cohesive communities for a London that serves everyone. The Trust aims for London to be a city where all individuals and communities can thrive, especially those experiencing disadvantage and marginalisation.

56. **Heart of the City:** runs the UK's only responsible business programme specifically designed to include SME's. This two-year Foundation programme equips and coaches business leaders to run successful companies that make a positive difference to people, places and the planet. Focusing on the practical, its events, online resources/templates and network are designed to support those companies new to responsible business with complex issues, such as tackling modern slavery. Heart of the City's network of contributor companies has responsible business expertise and resource in-house and they provide foundation members with support, mentoring and guidance. Funding from the City of London Corporation, City Bridge Trust and the City of Westminster Council has made places available for year one of the programme, enabling businesses to get involved without a designated responsible business budget.

57. Members of the network are businesses across a broad spectrum of industries, operating across London. The main risks of modern slavery within financial and other professional service industries are within their wider supply chain.

58. **The City of London Fairtrade Steering Committee** is administered by the charity JustShare on behalf of the City of London Corporation. Chaired by the Lord Mayor's Chaplain and attended by City Corporation Elected Members and relevant staff, the Recorder of London, Cheapside Business Alliance and various livery company

representatives, it leads action on promoting fair trade within the Square Mile.

b. Policies and commitments:

59. Following a review of its charitable funding, the City Bridge Trust launched its new grant programme, 'Bridging Divides'. This programme has the following funding priorities: a) Connecting the Capital, b) Positive Transitions, and c) Advice & Support. These will help the Trust to achieve its vision for London to be a city where all individuals and communities can thrive, especially those experiencing disadvantage and marginalisation.
60. The City Corporation believes that the concept of fair trade is central to sustainable development and aims to be recognised by its stakeholders and partners as an organisation that actively supports and promotes the concept of Fairtrade and fairly traded products. In support of this commitment, the City Corporation signed its Fairtrade Resolution in 2007.

c. Existing interventions

61. City Bridge Trust: The Trust is currently inviting applications from specialist support services that will enable positive transitions in relation to children and young people, migrants and refugees, disabled people, ex-offenders and survivors of domestic and sexual abuse; modern day slavery: trafficking; and hate crime.
62. The Trust currently funds the 'Helen Bamber Foundation', which supports refugees and asylum seekers who have experienced human trafficking, 'Stop the Traffick', which aims to systemically disrupt global human trafficking and modern slavery networks by building resilient communities and the 'Human Trafficking Foundation', which was established to support and add value to the work of the many charities and agencies operating to combat human trafficking in the UK.
63. **Heart of the City** supports businesses to create and implement a responsible business strategy, focusing on increasing activities across four key areas - community, environment, workplace and marketplace. To date over 750 businesses (600 of which are SMEs) have completed the charity's Foundation programme. Each member is supported by an account manager and online resources including modules, templates and tip sheets on ethical sourcing within procurement and tackling issues of modern-day slavery.
64. **The Fairtrade Steering Committee** organises a number of events to promote fair trade and ethical sourcing more generally. In November 2017, it ran an event aimed at raising a broader awareness of modern slavery, which featured speakers from the City Corporation's Procurement team and the Cambridge Centre of Applied Research in Human Trafficking, alongside Baroness Young of Hornsey, sponsor of the Modern Slavery (Transparency in Supply Chains) Bill 2017-2019.

d. Continuous improvement

65. The Bridging Divides grant programme will see around £100m distributed over the next five years to tackle inequality across the Capital and will continue to fund organisations that help to tackle modern slavery in the UK and support its victims.

66. Heart of the City provides online resources for its members regarding responsible procurement as well as a guide to the Modern Slavery Act. Should a Foundation Programme member have specific questions, Heart of the City can connect them to a volunteer from a Contributor company (often larger firms). These experienced responsible business professionals should be able to assist or signpost elsewhere.

v. Our Supply Chains

a. Remit and relevant risks

67. City Procurement is the City Corporation's centralised procurement team who deal with the majority of contracts worth £10,000 or more. Exceptions to this include agreements between the Barbican and its artists and services commissioned by the Department for Community and Children's Services. Interventions described in this section relate to those contracts for supplies, services and works over the £10,000 threshold. Staff undertaking procurement exercises below this value on behalf of the Corporation will be encouraged to undertake online training to ensure they consider the risks of modern slavery as part of their due diligence processes.

68. City Procurement take the lead on tackling modern slavery within our supply chains, but work in conjunction with stakeholder departments with the greatest risk of procuring goods, services or works associated with this crime.

69. The highest risks of people falling victim to modern slavery in our UK based supply chain include construction workers, those undertaking service contracts in relatively low paid industries such as cleaning, catering, security, agriculture and the care industry. Although not necessarily defined in the same way, the City Corporation recognises that those industries can often operate as part of the gig economy.

70. The highest risks of modern slavery further up our globalised supply chain, especially forced and child labour are associated with the production and manufacture of electronic equipment, textiles, agricultural commodities and construction materials. Conflict minerals including gold, tin, tantalum and tungsten, found in computer equipment and vehicles are also of significant concern.

b. Policies and commitments:

71. The City Corporation's 2015-2018 Responsibility Procurement Strategy aims to deliver best value in a way that improves the lives of those in its supply chain and help the City Corporation make procurement decisions that act as a catalyst for positive change. It is based on three pillars; social value, environmental sustainability and ethical sourcing. The latter details the City Corporation's commitment to tackling human and labour rights violations, including but not limited to modern slavery.

c. Existing interventions

72. **Commercial Contract Management (CCM):** The CCM team's role is to embed best practice consistently across the City Corporation's contract management provision, including supplier performance monitoring. The team have developed a 'Performance

Scorecard' to ensure that a standard and robust approach is taken to monitor, gather evidence and handle risks or failing performance. One of the ten elements covered by the Scorecard is ethical sourcing and in particular, supplier compliance with the Modern Slavery Act.

73. All relevant suppliers that wish to tender for City Corporation contracts must provide evidence that they have met the requirements of the Modern Slavery Act 2015 in order to be able to bid.
74. A series of interventions are currently being used to ensure compliance with human and labour rights legislation, including the Modern Slavery Act, according to the nature of the contract in question. The following are interventions currently taken amongst our highest risk categories of spend:
- a. **Communities and Children's Services:** Services for vulnerable young people, such as care leavers, and vulnerable adults are monitored regularly to ensure that safeguarding requirements are in place. New services are commissioned using the Corporation's minimum safeguarding standards. These are based on the set of minimum expectations developed by The City & Hackney Safeguarding Children Board (CHSCB) and provide clarity to both commissioners and contractors of services as to what must be considered when engaging external services. Due diligence procedures include Disclosure and Barring Service (DBS) checks, reviews of safeguarding policies, procedures and complaints. Providers ability to meet these standards are tested through the procurement process.
 - b. **Textiles:** As part of the City Corporation's current police uniform contract led by the Metropolitan Police, contractors are required to meet a strict corporate responsibility code of conduct covering product, environmental and ethical standards. Specific requirements include annual third-party audits, declarations of manufacturing facilities and registration with a shared audit database.
 - c. **Electronic equipment:** Over the last year, the City Corporation has introduced ethical sourcing requirements within the specifications of contracts involving electronic equipment including closed circuit television (CCTV) cameras and multi-functional devices (MFDs). Within 12 months, contractors are required to produce a supply chain map highlighting key risks including forced and child labour. Subsequently the contractors establish a strategy, in collaboration with the City Corporation, to mitigate these risks. Specific actions may include strengthened contractual requirements with their own supply chain, internal or third-party auditing and/or affiliations with organisations who specialise in supply chain transparency. As part of its social value offering, the City Corporation's IT managed service provider is currently undertaking a supply chain mapping exercise on IT hardware used to support the services delivered to the City Corporation.
 - d. **Construction materials:** The City Corporation is now taking a more robust approach to mitigating the risks associated with construction materials used as part of works contracts e.g. bricks, steel, timber, natural stone products etc. As part of the recently established intermediate and major works frameworks, the City Corporation requires contractors to present their current due diligence procedures within a month of contract commencement. Feedback is then provided on any further interventions the

City Corporation considers necessary. Proposals for continuous improvement are then developed by the contractor and mutually agreed as part of an ongoing action plan, which is monitored quarterly as part of ongoing key performance indicators (KPIs).

75. The Barbican, of which the City Corporation is the founder and principal funder, publishes its own annual [Modern Slavery Statement](#) as committed to in its 2017/18 statement. the Barbican has recently introduced a standard clause in all its future contracts for services and suppliers that commits suppliers to comply with the Barbican or City Corporation's Policies on modern slavery and human trafficking, both in engaging the supplier's own staff or in relation to sub-contractors and agents.
76. Additional clauses also recently introduced require suppliers to ensure they fulfil the obligations set out City Corporation's Equal Opportunities Policy and ensure all staff and all other people engaged or managed by external suppliers and visiting companies are treated with dignity and respect.
77. The City Corporation helped establish and co-Chairs the London Responsible Procurement Network (LRPN), a group of public sector representatives who meet regularly to share best practice and develop harmonised approaches to achieving social value, environmental sustainability and ethical sourcing. This Group also feeds into, the London Heads of Procurement Network, facilitated by London Councils. A series of meetings and workshops dedicated to modern slavery have already taken place with the aim of sharing effective interventions and learning lessons from one another on how to effectively tackle modern slavery within London's public sector supply chains.

d. Continuous improvement

78. Over the next year, a 'Supplier Code of Conduct' will be developed by City Procurement with the aim of detailing the City Corporation's expectations more clearly to our supply chain and facilitating a more rigorous approach to contract management.
79. Work planned for the coming year to improve our approach to implementing appropriate due diligence procedures within specific high-risk categories includes:
 - a. **Construction Sites:** Moving forward, City Surveyors, the Department of the Built Environment and others involved in managing construction works on behalf of the City Corporation will work with City Procurement, City of London Police and others to develop an approach to mitigating the risk of modern slavery taking place on its construction sites. It will involve the use of more detailed contractual provisions, awareness raising with supervisors on site and compliance checks. This work will take place alongside other action taken in response to increased levels of CSCS card fraud and incidences of illegal workers on UK construction sites.
 - b. **Textiles:** When establishing our new corporate uniform contract, the City Corporation will undertake an approach similar to that currently implemented in the existing police uniform contract, especially in regards to increased transparency of manufacturing locations and audit procedures.
 - c. **Food:** During the mobilisation period of the new corporate catering contracts, the City Corporation will work with its three catering contractors, as part of the CCM approach

and through supplier relationship management, to ensure appropriate due diligence procedures are undertaken, especially in relation to mitigating risks of exploitation of workers involved in food processing, harvesting and the fisheries industry.

80. The City Corporation will continue to collaborate with other public sector bodies as part of the LRPN and with the London Heads of Procurement (LHoP) to improve its own approach to tackling modern slavery and share learning and best practice with other public authorities.

81. Through its Commercial Contract Management team, the City Corporation will form closer relationships with a broader set of key suppliers and use a partnership approach to identify and help mitigate the risks of modern slavery occurring in our global supply chains.

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82. The City Corporation will refresh its Modern Slavery Statement annually; the next will be published in July 2019, which is more aligned to the organisation's annual financial reporting. This new statement will include updated policies and commitments, interventions, with a summary of progress made during November 2018 - June 2019 alongside future plans for continuous improvement.

Chief Officer sign-off: This Modern Slavery Statement was approved by the City of London Corporation's Summit Group on 26th September 2018.

Signed: John Barradell

Elected Member sign-off: This statement was approved by the City Corporation's Policy and Resources Committee on 15th November 2018.

Signed:

Catherine McGuinness Chairman, Policy & Resources Committee

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Introduction

- The first Modern Slavery Statement published by the City Corporation was released in November 2018 and remains available online. As well as outlining our approach to tackling modern slavery at that time, it outlines in detail our organisation's remits and risks related to modern slavery, alongside the City Corporation's structure and various legal functions, including as charity trustee of Bridge House Estates (Charity Reg. No. 1035628) (BHE).
- This current Modern Slavery Statement focuses in more detail on what is being done across the organisation: practices that have now been established to combat modern slavery, recent progress and continuous improvement commitments. Its publication follows the release of the City Corporation's Responsible Procurement Policy.
- In the interest of due diligence, transparency and responsible business commitments, this Modern Slavery Statement is produced by the City Corporation on a voluntary basis alongside peer organisations who are required to comply with Section 54 of the Modern Slavery Act 2015.
- For the purposes of this Statement and associated Policy, the term 'Modern Slavery' encompasses slavery, servitude, human trafficking, forced or compulsory labour and child labour.

The Modern Slavery Statement is divided into four sections, which set out the steps the City Corporation is taking:

- in discharging its functions to ensure that modern slavery is not taking place in its business, jurisdiction or supply chains.
- to use its wider influence to reduce modern slavery risks and impacts.

Our Organisation:

Prioritising our commitment at the highest level, protecting and educating staff and taking dedicated action and collaborating across the City Corporation to combat modern slavery.

Our Jurisdiction:

Minimising the risk of modern slavery occurring in the City of London (or Square Mile) and on City Corporation property, referring any victims to the help they need, ensuring any perpetrators are brought to justice and helping to identify modern slavery in any place the City Corporation has a presence.

Our Domestic Supply Chain:

Using responsible procurement and rigorous contract management to mitigate the risk of modern slavery taking place within our UK supply chains.

Our Global Supply Chain:

Using responsible procurement and effective due diligence procedures to minimise the risks of using global suppliers who contravene human and labour rights and exploit people through modern slavery.

Endorsed Modern Slavery Statement and Policy

City of London Corporation



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The City of London Corporation recognises its responsibility to help identify and eliminate modern slavery through its activities. The organisation will ensure that effective due diligence procedures are in place to safeguard against any form of modern slavery taking place within our business, our jurisdiction or our supply chain. These procedures will be reviewed and continuously improved upon over time.

This Policy and Modern Slavery Statement is endorsed and signed off by:

John Barradell
Town Clerk and Chief Executive
Signed July 2021

Catherine McGuinness
Chairman, Policy & Resources Committee
Signed July 2021 _____



Risks

Modern slavery is prevalent in many industries, both within and outside of the UK. The City Corporation recognises the risk associated with its own activities; this Modern Slavery Statement sets out our response.

Policies and commitments

Corporate Plan: People are safe & feel safe, Businesses are trusted to be environmentally and socially responsible. Responsible Business Strategy 2018-23: Promoting human rights through our every day work and decision making. BHE Bridging London Strategy, 2020 – 2045: aim to be sustainable.

Established Practice and Remit

- To ensure the most effective approach to tackling modern slavery, leads from across the organisation formed a working group to coordinate efforts, offer mutual support and make sure that resources, training and lessons learned were and continue to be shared.
- With representation from: the City of London Police, Bridge House Estates, Markets & Consumer Protection, the Barbican, Department for Community & Children's Services, and central support Departments - Town Clerk's (Human Resources and Learning & Development), Chamberlain's, and Comptroller & City Solicitor's.
- A modern slavery e-learning course is available to all staff, raising awareness of their role in identifying and reporting concerns.

Recent Progress

- This Modern Slavery Statement was co-authored by relevant leads across the organisation, coordinated by the Procurement and Responsible Business teams.
- Significant progress on combatting modern slavery has been made by individual teams, which is detailed further on, but from an organisational perspective, the most substantive progress includes:
 - Increased cross-departmental training and awareness raising events and cooperation with external agencies.
 - Increased cooperation with regional and national groups.
 - Establishment of an independent Responsible Business Panel, who advise on the City Corporation's approaches to ensuring social value, sustainability, and human and labour rights.
 - Living Wage commitment has been enhanced to include any person working under any of our contracts for two or more hours. This removes the requirement for people to be working on our sites or for longer periods of time (previously eight weeks).

Continuous Improvement

- An analysis of the nature of funds within City Corporation's investment portfolio was carried out. As work on responsible investment progresses, the risk of Modern Slavery being associated with our investment portfolio will be one of the Environmental, Social, Governance (ESG) aspects considered, to help shape City Corporation's investment activities and improve the transparency of due diligence measures undertaken.
- Will now publish a Modern Slavery Statement on annual basis.

Our Jurisdiction

Minimising the risk of modern slavery occurring in the Square Mile and on City Corporation property, referring any victims on to the help they need, ensuring any perpetrators are brought to justice and helping to identify modern slavery in any place the City Corporation has a presence



Risks

People at the highest risk of being victims of modern slavery in the Square Mile include sex workers, street traders, hospitality workers, cleaners, security personnel, construction workers and those providing domestic and care services or personal health and beauty services.

Policies and Commitments

City of London Police's Action Plan on Modern Slavery and Human Trafficking uses a four-pronged approach based on protection, preparation, prevention and pursuit. The Department for Children and Community Services (DCCS) work in partnership with City and Hackney Adult Safeguarding Board, City and Hackney Safeguarding Children's Partnership Board and the Safer City Partnership.

Established Practice and Remit

- While a corporate responsibility, DCCS are leaders for safeguarding children and adults in the City of London. They act as the single point of contact (SPOC) for Modern Slavery reporting.
- As per of their core duties, Markets & Consumer Protection (MCP) officers frequently visit sites in the Square Mile posing risks of modern slavery and are vigilant in observing and reporting any suspicious circumstances.
- The Serious Organised Crime board, led by the City of London Police (CoLP), brings together key agencies, assuming an advisory function to disrupt organised crime groups, inhibiting modern slavery activities.
- Specific roles and responsibilities are delegated within CoLP around training and intelligence and to deal with the victim(s), the suspect(s) or organised crime groups and the subsequent investigation.

Recent Progress

- Modern Slavery continues to be a topic of interest for MCP at the Licensing Liaison Partnership (which includes the Border Force).
- CoLP had 12 modern slavery referrals and 4 'duty's to notify' in 2020. Numbers were reduced in 2020 due to a reduction in footfall in response to Covid-19 and a large reduction in crime traditionally linked to criminal exploitation.
- 13 CoLP officers completed a College of Policing four day Modern Slavery Investigator course enabling them to provide tactical advice on Modern Slavery investigations.
- 16 CoLP officers completed a College of Policing 2 day Modern Slavery Victim Liaison Officer Course to assist in the identification and support of victims.
- Modern Slavery training inputs have been provided to frontline officers, new recruits and custody officers.
- CoLP have actively participated in Modern Slavery and County Lines intensification activity, identifying potential victims.

Continuous Improvement

- A SPOC for modern slavery issues to be set up in MCP and will be attending the MOPAC commissioned Focus on Labour Exploitation (FLEX) modern slavery 'train the trainer' in June and July, with training to be delivered to the teams after.
- A bespoke, shorter Modern Slavery investigator course is being developed internally for City of London Police investigators.
- CoLP continue to develop partnerships across the community and within policing to improve the identification and response to modern slavery.
- DCCS are investigating referral pathways into services including those supporting homeless people.
- DCCS will review the current internal training and promote further awareness.

Our Domestic Supply Chain

Using responsible procurement and rigorous contract management to mitigate the risk of modern slavery taking place within UK supply chains.



Risks

Based on the value and nature of contracts, the highest risks of modern slavery occurring in our UK supply chain include entry level roles in the construction, security, waste, cleaning and laundering, food harvesting and processing, and care industries, those typically undertaken by agency, seasonal and/or migrant workers, or those without formal UK qualifications

Policies and Commitments

The City Corporation's Responsible Procurement Policy 2020 includes commitments to pay the Living Wage and guard against modern slavery, human and labour rights abuses, and unfair working practices in high risk supply chains.

Established Practice and Remit

- Domestic supply chain categories: Healthcare/ homecare and supported living, taxis, food, security, hazardous waste and construction sites.
- The requirement for all suppliers that are in scope of the Modern Slavery Act 2015 to have a valid Modern Slavery Statement is incorporated as a pass/fail procurement criterion in the City Corporation's Supplier Questionnaire (SQ).
- A dedicated Responsible Procurement resource overseeing tailored interventions to ensure supply chain due diligence in all contracts posing a high risk of UK modern slavery.

Recent Progress

- In depth training was delivered in February 2021 to all City Procurement staff including Commercial Contract Management, Procurement Operations, Sourcing & Category Management and Accounts Payable staff on Responsible Procurement including modern slavery.
- Guidance on relevant contract types and recommended interventions to minimise the risk of domestic modern slavery in our supply chains has also been provided to procurement staff.
- Supplier evaluation questions have been expanded to include checking validity of Construction Skills Certification Scheme (CSCS) cards.
- Collaboration with London Heads of Procurement – with the Responsible Procurement Manager leading a workshop on tackling modern slavery in supply chains.
- Commitment in our Responsible Procurement Policy (published in 2020) to tackle modern slavery and a supplementary Action Plan drafted focusing on domestic modern slavery.

Continuous Improvement

- Introducing a specific requirement for site managers/ other relevant (sub)contractor staff to have the facility to check CSCS cards.
- Enhanced compliance provisions within standard contract terms in conditions.
- Explore whether or not it is something that could be incorporated into street works/ construction codes of conduct.
- Implement more structured internal procurement guidance for relevant decision making boards and commissioning officers.
- To complement the newly signed RP Policy, a focused Action Plan, including increased monitoring of compliance by high risk⁵ categories, will be implemented.

Our Global Supply Chain

Using responsible procurement and effective due diligence procedures to minimise the risks of using global suppliers who contravene human and labour rights and exploit people through modern slavery



Risks

The highest risks of modern slavery in our global supply chain, especially forced and child labour are associated with the production and manufacture of electronic equipment, textiles, agricultural commodities and construction materials. Conflict minerals (gold, tin, tantalum and tungsten) and cobalt found in computer equipment and vehicles are also of significant concern.

Policies and Commitments

Underpinned by the City Corporation's Responsible Business Strategy, our Responsible Procurement Policy 2020 makes specific human and labour rights commitments, with an action plan focussed on tackling modern slavery in global supply chains

Established Practice and Remit

The Responsible Procurement Manager tailors interventions to ensure supply chain due diligence in all contracts posing a high risk of global modern slavery, such as:

- For relevant contracts with lower risk/ spend/ leverage, pass/fail confirmation of adequate due diligence is required, to ensure awareness of and compliance with ILO conventions. High risk materials are outlined.
- For higher spend/ risk/ leverage contracts more active steps are taken within the procurement process including requiring contractors to declare current due diligence procedures followed by staged, mutually agreed upon continuous improvement requirements based on hot spot risks.

Recent Progress

- Since the publication of the City Corporation's first Modern Slavery Statement in November 2018, 99.66% of contracts by value (a total contract value of £4,227,854,738), which are deemed to be of high risk in terms of global modern slavery, have had active interventions incorporated. 0.18% of the remaining proportion (a total contract value of £7,542,818) were framework contracts established by third parties, with 0.15% (a total contract value of £6,728,930) relying on the validity of the contractor's Modern Slavery Statements alone. A goal of 100% active interventions has now been set, including for framework contracts.
- The City Corporation presented examples of procurement interventions as part of the Local Government Association (LGA) webinar on Modern Slavery in Local Government Supply Chains on 16 December 2020, and over the last three years has continued to work with the LGA, Home Office, Ethical Trade Initiative (ETI) and Greenwich University's Business, Human Rights, and Environmental Research (BHRE) Group to raise awareness and support the broadening of the Modern Slavery Act 2015 to the public sector.
- Commitment in our Responsible Procurement Policy published 2020 to tackle human and labour rights abuses in high risk supply chains and a supplementary Action Plan drafted focusing on global modern slavery.

Continuous Improvement

- Enhanced bank of questions for contract tenders and guidance with an increased focus placed on working with contractors to reduce risks of modern slavery within their supply chains.
- Contribute towards pan-London work through the London Responsible Procurement Network and London Procurement Network, which will include workshops involving industry representatives.
- Sign-off and implementation of an Action Plan which includes actions such as identifying supply chain hotspots for current high risk contracts and developing supplier action plans for improvement.

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| Committee(s): Strategic Planning & Performance Committee Police Authority Board | Dated: 26 th November 2024 3 rd December 2024 |
| Subject: Community Engagement Quarterly Update & Measures of the Strategic Plan | 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 | For Discussion |
| Report author: Emma Cunnington, Head of Strategy & Planning | |

Summary

This report outlines the progress and developments in the City of London Police and City of London Corporation’s joint strategic community engagement plan. Approved at Police Authority Board in October 2024, this plan centres on four priorities outlined in the Neighbourhood Policing Strategy: crime prevention, protection of vulnerable individuals, intelligence gathering and fostering public trust.

A new cluster panel model launches in November 2024, creating six panels with biannual meetings. The model includes inviting representatives from relevant City Corporation departments and aims to improve public attendance and address community safety concerns.

Metrics have been set to assess the effectiveness of the strategic community engagement plan. Starting from January 2024, data on engagement outcomes such as public confidence, crime reduction and demographic diversity will be reported to the Strategic Planning & Performance Committee. The report will also list various community-safety related engagement activities (across the police, police authority and Corporation) undertaken since September 2024, including public events and initiatives focused on crime prevention, inclusion and hate crime awareness.

Recommendation(s)

It is recommended that Members:

- Note the report and provide feedback on the proposed outcomes and metrics of the Community Engagement Strategic Plan (see paragraphs 4-6).

Main Report

Background

1. At the Strategic Planning & Performance Committee on 26 September 2024 and the Police Authority Board on 2 October 2024, Members received and approved a joint City Police / Police Authority and Corporation strategic community engagement plan. This plan is based on the four priority areas of the City Police's 2023 Neighbourhood Policing Strategy:
 - a. Preventing crime, disorder and anti-social behaviour
 - b. Protecting the vulnerable and repeat victimisation
 - c. Providing a flow of intelligence on a range of issues
 - d. Promoting a culture of trust and confidence.
2. Members noted in previous discussions on this topic that data on means of engagement should be improved to assess their effectiveness, as should the promotion of the meetings, as cluster panels in particular have been poorly attended, and that who engages should be addressed considering community safety issues are not solely the responsibility of the Police to respond to.
3. In particular, Members asked officers to consider how engagement could be measured and set a performance framework for engagement against the four priority areas in the Neighbourhood Policing Strategy.

Current Position

Community Engagement Strategic Plan Outcomes and Metrics

4. In line with the Neighbourhood Policing Strategy, the Community Engagement Strategic Plan seeks to achieve the following outcomes:
 - a. To improve public trust and confidence in the City of London Police
 - b. To reduce crime in hotspot areas following targeted crime prevention advice
 - c. To inform the public on how to protect themselves from crime as a result of crime prevention advice
 - d. To increase diversity in demographics of public surveys
5. By the January 2025 SPPC meeting officers will be in a position to start providing performance data for scrutiny by Members concerning metrics for the Community Engagement Strategic Plan.
6. These metrics will include:
 - a. Number of cluster panel meetings
 - b. Number of business engagements
 - c. Number of Dedicated Ward Officer (DWO) - initiated community engagement events
 - d. Time dedicated to DWO high-visibility cluster patrols
 - e. Volunteer time dedicated to community engagement (hrs)

- f. Confidence score in the [City of London Police's public confidence survey](#)
 - g. Demographic breakdown (gender, ethnicity, age) of respondents to the City of London Police's public confidence survey
 - h. DWO Nextdoor activity (no of posts)
 - i. Number of 'you said – we did' problem-solving logs for cluster panel meetings
 - j. Number of social media posts containing crime prevention messaging. Members should note that officers are bringing a specific paper on crime prevention and deterrence communications.
7. Whilst attendance at Cluster Panel meetings will not be a performance metric, officers will be monitoring this information, alongside topics raised by the public.

Cluster Panels

8. Since the previous paper in September the new cluster panel model has been launched. This new model consists of two meetings per year per six clusters (12 in total), of which the City of London Corporation (Environment and Community & Children's Services) are invited to attend all of them and have committed to six per year. In addition, the City of London Police will be organising two City-wide business meetings per year from 2025 – again with an invitation for relevant City of London Corporation departments to be present and answer queries and concerns from the business community.
9. These new cluster panel meetings have been promoted through the following channels:
- a. The Neighbourhoods Policing website has been updated with the date, time, venue and Teams link of each Cluster Panel meeting, with a questionnaire to survey potential attendees as to which topics they would wish to have discussed
 - b. Social media has been utilised (X and Meta platforms) to promote the meetings and there is a continued plan for social media engagement across November
 - c. A letter co-signed by the PAB Chair, the Lead Member for residential engagement and the Commissioner has been circulated to all Members of the Court of Common Council asking for their assistance to promote the meetings
 - d. Dedicated Ward Officers have been promoting the meetings and survey through their channels including whilst on patrol
 - e. The meetings have been advertised via the City Belonging network distribution list
 - f. The City of London Corporation have advertised the Cluster Panel meetings in residential newsletters to the Golden Lane and Middlesex Street estates (1,700) recipients and to the Barbican (2,200) recipients (1st November). In addition, the meetings were advertised in the City Resident newsletter.

- g. The Police Authority team included an update in a Member briefing to the Court of Common Council.

10. A verbal update on the recent cycle of Cluster Panel meetings will be given at the meeting, and officers would welcome any feedback from Members who attended any of the following meetings:

| Date | Cluster Panel | Location | Type | Time |
|-------------|----------------------------|--|-------------|-------------|
| 06/11/24 | Bank Cluster Panel | Innholders Hall, College St | Hybrid | 13:00 |
| 07/11/24 | Liverpool St Cluster Panel | 100 Bishopsgate | Hybrid | 13:00 |
| 07/11/24 | Fenchurch Cluster Panel | Portsoken Community Centre (incl. Middx St and Mansel St Estate) | In-person | 15:00 |
| 13/11/24 | Fleet Cluster Panel | 1 Mitre Court, Inner Temple | Hybrid | 16:00 |
| 13/11/24 | Monument Cluster Panel | Royal Society for Blind Children (RSBC), Lower Thames | Hybrid | 17:00 |
| 27/11/24 | Barbican Cluster Panel | Golden Lane Community Centre | Hybrid | 18:30 |

11. For this series of meetings, and future meetings, data will be captured to provide insight and report to Strategic Planning & Performance Committee on:
- Number of attendees at Cluster Panel meetings
 - Topics raised by attendees (and whether they fall into City of London Police or City of London Corporation remit).

12. This information will provide officers evidence at the end of the Cluster Panel model pilot in December 2025 to assist with evaluation.

Wider community engagement since September 2024

13. Since the last report to the SPPC, the following Police-led engagements have taken place or are due to take place soon:

| No. | Date | Engagement | Stakeholder group |
|------------|-------------|-------------------|--------------------------|
|------------|-------------|-------------------|--------------------------|

| | | | |
|----|------------------------|---|--|
| 1 | 1 September 2024 | Barbican Garden Party | Residents |
| 2 | 5 September 2024 | Black Apprentices Network Event (City Belonging) | Workers |
| 3 | September 2024 | Engagement with Middlesex Street for new policing base | Residents |
| 4 | 10 September 2024 | Crime Prevention Stand at 69 Old Broad Street | Residents, Workers |
| 5 | 10 September 2024 | Suicide Prevention Day | Residents, Workers, Visitors |
| 6 | 11 September 2024 | Independent Advisory Scrutiny Group (IASG) | Residents, Workers |
| 7 | Mid-September 2024 | Spiking Intensification Week | Residents, Workers, Visitors |
| 8 | 23 – 29 September 2024 | National Inclusion Week | Residents, Workers, Visitors |
| 9 | October 2024 | Black History Month | Residents, Workers, Visitors |
| 10 | October 2024 | Diwali events through City Belonging | Workers |
| 11 | 3 October 2024 | David Game College – staying safe in London for new students | Other (students) |
| 12 | 3 October 2024 | Op Reframe (Drink Spiking focus) | Residents, Workers, Visitors |
| 13 | 12 – 19 October 2024 | Hate Crime Awareness Week | Residents, Workers, Visitors |
| 14 | 16 October 2024 | Careers talk for City of London Girls School | Other (school pupils) |
| 15 | 16 October 2024 | Lord Mayor’s Colloquy: Global Faith Perspectives on ‘Disagreeing Agreeably’ | Other (students from Goodenough College and faith leaders) |
| 16 | 16 October 2024 | Business webinar: Policing the Insure our Survival week of action | Workers |
| 17 | 17 October 2024 | Leadenhall Hate Crime Awareness Stall | Workers |
| 18 | 22 October 2024 | City Question Time | Residents |
| 19 | 23 October 2024 | Business webinar: Policing the Insure our Survival Week of Action | Workers |
| 20 | 31 October | Police Race Action Plan – Black History Event (The Fierce Urgency of Now – Correcting the Impact of Racism) | Residents, Workers, Visitors |
| 21 | November 2024 | Cluster Panel Meetings (Bank, Barbican, Fleet, Fenchurch Street, Liverpool Street, Monument) | Residents, Workers |

| | | | |
|-----------|--------------------------------|---|------------------------------|
| 22 | November 2024 | Islamophobia Awareness Month | Residents, Workers, Visitors |
| 23 | 25 November – 10 December 2024 | 16 days of activism against gender-based violence | Residents, Workers, Visitors |

Conclusion

14. This report provides an overview of the launch of the new Cluster Panel model as approved in the Community Engagement Strategic Plan in September 2024, an overview of outcomes and metrics that will be reported quarterly into SPPC from January 2025, and a list of engagements that have taken place since September 2024 or are due to take place soon.

Background papers

- *Strategic Community Engagement Plan: Keeping those who live, work and visit the City safe and feeling safe* – joint report of the Commissioner of Police and the Police Authority Director presented to the Strategic Planning & Performance Committee on 26 September 2024 and the Police Authority Board on 2 October 2024.

Appendices

- None

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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