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### **City of London Police Authority Board**

Date: WEDNESDAY, 12 FEBRUARY 2025

**Time:** 11.00 am

Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

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

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

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Ian Thomas CBE Town Clerk and Chief Executive

### AGENDA

#### Part 1 - Public Agenda

#### 1. APOLOGIES

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

#### 3. MINUTES

To approve the public minutes and non-public summary of the meeting held on 4 December 2024.

For Decision (Pages 9 - 14)

#### 4. OUTSTANDING REFERENCES

Joint report of the Town Clerk and Commissioner.

For Information

(Pages 15 - 16)

#### 5. RECENT POLICE AUTHORITY BOARD SUBCOMMITTEE MINUTES

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

#### **For Information**

- a) Economic and Cyber Crime Committee 241119 (Pages 17 20)
- b) Resource Risk and Estates Committee 241119 (Pages 21 24)
- c) Professional Standards and Integrity Committee 251119 (Pages 25 28)
- d) Strategic Planning and Performance Committee 241203 (Pages 29 32)

#### 6. ANNUAL REVIEW OF TERMS OF REFERENCE

Report of the Town Clerk.

For Decision (Pages 33 - 36)

#### 7. CHAIR'S PUBLIC UPDATE

The Chair to be heard.

For Information (Pages 37 - 40)

#### 8. COMMISSIONER'S UPDATE

Commissioner & Chief Officers to be heard.

For Information (Pages 41 - 44)

#### 9. CITY OF LONDON POLICE AUTHORITY BOARD REVENUE BUDGET 2025/26

Joint report of the Town Clerk and the Commissioner.

For Decision (Pages 45 - 48)

#### 10. REVENUE AND CAPITAL BUDGET 2025/26

Report of the Commissioner.

For Decision (Pages 49 - 78)

11. **DRAFT POLICING PLAN 2025-28** Report of the Commissioner.

> For Decision (Pages 79 - 122)

### 12. POLICY AND PROTOCOL TO TACKLE THE NEGATIVE IMPACTS OF ROUGH SLEEPING

Report of the Executive Director of Community and Children's Services.

For Decision (Pages 123 - 166)

#### 13. **DRAFT HIGH LEVEL BUSINESS PLAN** Report of the Town Clerk.

For Decision (Pages 167 - 180)

14. **REVENUE AND CAPITAL MONITORING UPDATE – Q3 2024/25** Report of the Commissioner.

For Information (Pages 181 - 220)

15. **NATIONAL LEAD FORCE PERFORMANCE PACK\*** Report of the Commissioner.

For Information

(Pages 221 - 246)

#### 16. ANTI-TERRORISM TRAFFIC REGULATION ORDER\*

Report of the Executive Director Environments Department

For Information (Pages 247 - 254)

### 17. EQUITY, DIVERSITY, INCLUSIVITY (EDI) UPDATE\* Report of the Commissioner.

For Information (Pages 255 - 296)

### 18. COMMUNITY ENGAGEMENT STRATEGIC PLAN QUARTERLY UPDATE

Report of the Commissioner.

For Discussion (Pages 297 - 306)

#### 19. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD

#### 20. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT

#### 21. 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

#### 22. NON-PUBLIC MINUTES

To approve the non-public minutes of the meeting held on 4 December 2024.

For Decision (Pages 307 - 310)

#### 23. NON-PUBLIC OUTSTANDING REFERENCES

Joint Report of the Town Clerk and Commissioner.

For Information (Pages 311 - 312)

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

The Chair to be heard.

For Information (Verbal Report)

#### 25. COMMISSIONER'S UPDATES

The Commissioner & Chief Officers to be heard.

For Information (Verbal Report)

#### 26. FUTURE POLICE ESTATE PROGRAMME: CITY OF LONDON POLICE AND CITY OF LONDON FUTURE POLICE ESTATE PROGRAMME RESOURCE REQUIREMENTS

Report of the Commissioner.

For Decision (Pages 313 - 320)

#### 27. DRAFT RISK APPETITE STATEMENT

Report of the Chief Strategy Officer

For Decision (Pages 321 - 334)

#### 28. CITY OF LONDON POLICE RISK REGISTER UPDATE\*

Report of the Commissioner.

For Information (Pages 335 - 346)

#### 29. BANKSY ARTWORK RELOCATION

Report of the Town Clerk.

For Information (Pages 347 - 384)

### 30. FRAUD AND CYBER CRIME REPORTING AND ANALYSIS SERVICE - REGULAR PROGRAMME PROGRESS UPDATE \*

Report of the Commissioner

For Information

(Pages 385 - 478)

#### 31. CITY OF LONDON POLICE PROPERTY STORE\*

Joint report of the City Surveyor and the Commissioner.

For Information (Pages 479 - 480)

#### 32. FUTURE NETWORK PROGRAMME - ISSUES REPORT\*

Report of the Chamberlain.

For Information (Pages 481 - 486)

### 33. **FUTURE NETWORK PROGRAMME - PROCUREMENT OPTIONS APPRAISAL\*** Report of the Chamberlain.

For Information (Pages 487 - 494)

#### 34. TACTICAL FIREARM TRAINING FACILITY\*

Joint report of the City Surveyor and the Commissioner.

For Information (Pages 495 - 518)

#### 35. REVENUE AND CAPITAL BUDGET 2025/26 NON-PUBLIC APPENDICES

To be read in conjunction with agenda item 10.

For Information (Pages 519 - 522)

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

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

#### Part 3 - Confidential Agenda

#### 38. CONFIDENTIAL MINUTES

To approve the confidential minutes of the meeting held on 4 December 2024.

**For Decision** 

## Agenda Item 3

#### CITY OF LONDON POLICE AUTHORITY BOARD Wednesday, 4 December 2024

Minutes of the meeting of the City of London Police Authority Board held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Wednesday, 4 December 2024 at 11.00 am

#### Present

#### Members:

Tijs Broeke (Chair) Deputy James Thomson (Deputy Chairman) Nicholas Bensted-Smith Alderman Professor Emma Edhem Helen Fentimen OBE JP Jason Groves Deputy Madush Gupta Graham Packham Deborah Oliver Deputy Dawn Wright Sir Craig Mackey (External Member)

#### Officers:

Ian Thomas CBE Greg Moore **Richard Riley CBE** Oliver Bolton Josef Shadwell Rachael Waldron Charles Smart Kezia Barrass Chandni Tanna Tabitha Swann Thomas Wrench Frank Marchionne Caroline Al-Beyerty Zakki Ghauri Ola Obadara Aga Watt

#### **City of London Police:**

- Commissioner Pete O'Doherty Assistant Commissioner Paul Betts T/Assistant Commissioner Nik Adams Alix Newbold Ally Cook Chris Bell
- Emma Cunnington

- Town Clerk's Department
- Corporate Strategy & Performance
- Corporate Strategy & Performance
- City Solicitor's
- Chamberlain's
- Chamberlain's
- City Surveyor's
- Chamberlain's
- City of London Police

#### 1. APOLOGIES

Apologies were received from Melissa Collett.

# 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 2 October 2024 are approved as an accurate record.

#### 4. **RECENT SUBCOMMITTEE MINUTES**

**RESOLVED,** - that Members received and noted the minutes from recent subcommittees as follows

- Economic and Cyber Crime Committee 16 September 2024
- Resource Risk and Estates Committee 18 September 2024
- Professional Standards and Integrity Committee 25 September 2024
- Strategic Planning and Performance Committee 26 September 2024

#### 5. OUTSTANDING REFERENCES

The Committee considered a report of the Town Clerk which set out Outstanding References from previous meetings of the Committee. **RESOLVED**, – That the report be noted report.

#### 6. CHAIR'S PUBLIC UPDATE

Members received the Chair's public update. **RESOLVED**, - that the report be noted.

#### 7. COMMISSIONER'S UPDATE

Members received the Commissioner's public update. **RESOLVED**, - that the report be noted.

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

Members received a report of the Chief Strategy Officer which sought endorsement from the Police Authority Board for the Corporation Risk Management Policy. The City of London Police confirmed that they were content with the revised policy.

**RESOLVED**, - that the Police Authority Board endorsed the draft risk management policy to apply to the City of London Police.

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

Members received a report of the Town Clerk which sought approval of revised Terms of Reference for the Board.

**RESOLVED**, - that Members agreed to defer the decision to the next meeting to ensure accuracy of the term lengths listed in the White Paper, but were content with the suggested amendments to the Terms of Reference.

#### 10a. ANNUAL CUSTODY UPDATE

Members received a report of the Commissioner which provided an annual custody update.

The Chair noted that there were 23 areas listed as areas for improvement in the previous custody inspection by HMICFRS and asked for an update. Officers explained that these areas for improvement had been outlined in depth at Strategic Planning and Performance Committee.

Members queried how this work linked in with the Equity Diversity and Inclusivity (EDI) strategy, particularly in relation to the race action plan. Officers agreed to provide further specific detail on Race Action Plan and EDI strategy in future reports.

**RESOLVED**, - that the report be noted.

#### 10b. INDEPENDENT CUSTODY VISITING SCHEME ANNUAL REPORT 2023/24

Members received a report of the Town Clerk which presented the Independent Custody Visiting (ICV) Scheme annual report for 2023/24.

The Chair offered thanks to Members of the of the scheme and the late Chair, and requested that officers draft a note of thanks to be sent on behalf of the Chair.

Members noted that there had been progress on recruiting new ICV volunteers and urged continued efforts to increase the number of volunteers. **RESOLVED**, - that the report be noted.

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

Members received a report of the City Remembrancer which outlined the Terrorism (protection of premises) Bill – Martyn's Law.

Members noted that the Corporation was aware of numerous obligations as a result of the Bill, and that City Surveyors and others were engaged in assessing these implications. Members queried the impact on venues that hire temporary staff and if those had been considered.

**RESOLVED**, - that the report be noted.

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

Members received a report of the Commissioner which provided an update on Equity, Diversity and Inclusivity programme. RESOLVED, - that the report be noted.

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

Members received a report of the Commissioner which provided an outline of the Policing Plan 2025-28.

Members noted that theft was the most reported crime type in the City, and encouraged officers to provide reassurance that specific goals were in place to address this issue. Officers outlined that theft was included in the national definition of 'Neighbourhood Policing' but undertook to look at ways of making 'theft' more explicit in future drafts of the Plan.

**RESOLVED**, - that the report be noted.

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

Members received a report of the Commissioner which provided an update on Revenue and Capital Monitoring for Q2 2024/25. **RESOLVED**, - that the report be noted.

 MODERN SLAVERY STATEMENT 2024-2029\* Members received a report of the Town Clerk which outlined the Modern Slavery Statement 2024 – 2029. RESOLVED, - that the report be noted.

### 30b. COMMUNITY ENGAGEMENT QUARTERLY UPDATE & MEASURES OF THE STRATEGIC PLAN

Members received a report of the Commissioner that provided a quarterly update of community engagement and measures of the strategic plan. Members agreed to consider the report in the public session. **RESOLVED**, - that the report be noted.

- 16. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD** There were no questions.
- 17. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT** There were no items of urgent business.

#### 18. EXCLUSION OF THE PUBLIC

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

#### 19. NON-PUBLIC MINUTES

**RESOLVED**, - that the non-public minutes of the meeting held on 2 October 2024 were approved as an accurate record.

#### 20. NON-PUBLIC OUTSTANDING REFERENCES

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

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

There was no update

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

Members received the Commissioner's non-public update.

23. 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 of the Fraud and Cyber Crime Reporting and Analysis Service programme.

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

Members received a report of the Commissioner which provided the City of London Police staff survey results.

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

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

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

Members received a report of the Commissioner which provided an update on the City of London Police Medium Term Financial Plan.

#### 28a. FUTURE POLICE ESTATES\*

Members received a report of the City Surveyor and Commissioner which provided an update on future police estates.

#### 28b. FUTURE POLICE ESTATE INCL. SALISBURY SQUARE DEVELOPMENT PROGRAMME DASHBOARD

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

#### 28c. GUILDHALL YARD EAST\*

Members received a joint report of the City Surveyor and the Commissioner which provided an update on the Guildhall Yard East programme.

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

Members received a report of the Commissioner which outlined the police cyber alarm approval to publish tender prior to new recruitment.

# 30a. STRATEGIC COMMUNICATIONS AND ENGAGEMENT PLAN FOR ECONOMIC AND CYBER CRIME\*

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

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

Members received a report of the Town Clerk which outlined actions taken in between meetings under Standing Order 41(a).

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

There were no items of urgent business.

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

There were no questions.

#### 34. **OPERATION ADDINGTON REPORT\***

Members received a confidential report of the Commissioner which outlined a review and findings into Operation Addington.

At 12:59 the meeting was extended under Standing Order 40.

#### 35. POLICE PAY - LONDON ALLOWANCE

Members received a confidential report of the Commissioner which sought support for a decision to match the planned Metropolitan Police Service (MPS) increase in London Allowance payments to police officers.

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

Members received a confidential joint report of the Chamberlain and the Chief People Officer which provided an update following the trade union engagement on City of London pay award 2024/25.

#### 36. CHIEF OFFICER UPDATE

Members received a report of the Commissioner which provided an update on Assistant Commissioner recruitment and the proposal to re-name the Assistant Commissioners to Deputy Commissioners to better reflect naming conventions across national policing.

**RESOLVED**, - that the report be noted.

The meeting ended at 13:09

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Chairman

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

#### ECONOMIC AND CYBER CRIME COMMITTEE OF THE CITY OF LONDON POLICE AUTHORITY BOARD Tuesday, 19 November 2024

Minutes of the meeting of the Economic and Cyber Crime Committee of the City of London Police Authority Board held at Committee Rooms, Guildhall on Tuesday, 19 November 2024 at 9.30 am

#### Present

#### Members:

Deputy James Thomson (Chair) Jason Groves Deputy Madush Gupta Graham Packham

#### Officers:

Richard Riley CBE Oliver Bolton Kezia Barrass - Town Clerk's Department

- Town Clerk's Department
- Town Clerk's Department

**City of London Police** Chris Bell Eleanor Summers

- City of London Police
- City of London Police

#### 1. APOLOGIES

Apologies were received from Tijs Broeke, Naresh Sonpar, Nick Bensted-Smith, Michael Landau, Sir Craig Mackey and Dawn Wright.

#### 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 16 September 2024 were approved as an accurate record.

#### 4. NATIONAL LEAD FORCE PERFORMANCE PACK

Members received a report of the Commissioner which provided an outline of the National Lead Force performance.

Members felt that the report would benefit from the inclusion of an executive summary to provide a full picture and narrative of what the data is showing. Members felt that the executive summary should reflect a strategic overview of performance with summarised highlights.

Members suggested a workshop be organised with key officers and Members to provide further feedback on the report.

**RESOLVED**, - that the report be noted.

#### 5. CYBER GRIFFIN UPDATE

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

Members noted recent positive discussions which had taken place with the Home Office around the Spending Review. The Chair emphasised the need to continue with the momentum developed. Members felt that services in the report should have clarified definitions and should evidence the outcomes more than the activities. **RESOLVED**, - that the report be noted.

#### 6. INNOVATION & GROWTH - UPDATE OF CYBER & ECONOMIC CRIME RELATED ACTIVITIES

Members received a report of the Executive Director Innovation and Growth which provided an update of cyber and economic crime related activities.

Members noted the ongoing work with marketing colleagues to develop a robust communications strategy which would involve proactive engagement.

The Chair noted the absence of reporting on economic security and requested that any future reports include an update on the development of economic security in the City of London.

**RESOLVED**, - that the report be noted.

- 7. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE** There were no questions.
- 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 16 September 2024 were approved as an accurate record.

11. STRATEGIC COMMUNICATIONS AND ENGAGEMENT PLAN FOR ECONOMIC AND CYBER CRIME

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

- 12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE** There were no questions.
- 13. 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 10:33

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Chairman

Contact Officer: Kezia Barrass Kezia.Barrass@cityoflondon.gov.uk This page is intentionally left blank

### Agenda Item 4b

#### RESOURCE, RISK & ESTATES (POLICE) COMMITTEE Tuesday, 19 November 2024

Minutes of the meeting of the Resource, Risk & Estates (Police) Committee held at Committee Rooms, Guildhall on Tuesday, 19 November 2024 at 12.30 pm

#### Present

#### Members:

Deputy James Thomson Helen Fentimen OBE JP Deborah Oliver Jacqui Webster Randall Anderson

#### Officers:

Richard Riley CBE Kezia Barrass Zakki Ghauri Ola Obadara

#### **City of London Police**

Assistant Commissioner Paul Betts Ally Cook Alix Newbold Chris Bell Mark Paddon Steven Reynolds Kelly Glazebrook Martin O'Regan Gary Brailsford-Hart Susan Penn Emma Cunnington

- Town Clerk's Department
- Town Clerk's Department
- Chamberlain's
- City Surveyor's
- City of London Police

#### 1. APOLOGIES

Apologies were received from Alderman Tim Hailes, Tijs Broeke, Deputy Dawn Wright, Michael Landau, Ruby Sayed.

### 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 18 September 2024 were approved as an accurate record.

#### 4. PUBLIC 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. 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 Finance Officer and the Chief Operating Officer. Members requested further information be provided on the Productivity Review, and that all acronyms and operation names be explained in reports to ensure wider understanding.

**RESOLVED**, - that the report be noted.

#### 6. REVENUE AND CAPITAL MONITORING UPDATE - Q2 2024/25

Members received a report of the Commissioner which provided an update on revenue and capital monitoring of Q2 2024/25.

Members sought assurances from officers about the year on year impact and planning to avoid future reliance on reserves. Officers agreed to consider how best to communicate more frequently with Members on this topic.

Members noted that an Asset Recovery Incentivisation Scheme (ARIS) forecasting report would be submitted to this Committee as soon as possible.

The Police Authority Director agreed to provide an analysis of hot spot funding. **RESOLVED**, - that the report be noted.

#### 7. Q2 WORKFORCE MONITORING REPORT- 2024-25

Members received a report of the Commissioner which provided an overview of workforce monitoring in Q2 2024/25.

Officers agreed to submit the Strategic Workforce Plan to the next Committee to provide a further outline of the existing gaps and the associated risks.

Members sought assurances about the "de-civilianisation" of roles, Officers outlined that this was not a reality at present but could be a future consideration.

Members queried the Attraction Strategy; Officers agreed to provide more detailed information on this strategy at the next Committee meeting.

Members noted the increased statistics relating to assaults on officers and queried the cause and impacts of this; officers agreed to share further information on this with Members at the next Committee.

**RESOLVED**, - that the report be noted.

8. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE** There were no questions.

#### 9. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT** There was no other business.

#### 10. 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.

#### 11. NON-PUBLIC MINUTES

**RESOLVED**, - that the non-public minutes of the meeting held on the 18 September 2024 be approved as an accurate record.

#### 12. CITY OF LONDON POLICE MEDIUM TERM FINANCIAL PLAN UPDATE

Members received a report of the Commissioner which provided an update on the City of London Police Medium Term Financial Plan.

#### 13a. FUTURE POLICE ESTATE DEVELOPMENT PROGRAMME

Members received a report of the City Surveyor which provided an update of the future police estates programme. This item was considered in conjunction with item 13b and 13c.

#### 13b. FUTURE POLICE ESTATE INCL. SALISBURY SQUARE DEVELOPMENT PROGRAMME DASHBOARD

Members received a joint report of the Commissioner and the City Surveyor which provided the future police estates development programme dashboard. This item was considered in conjunction with 13a and 13c.

#### 13c. GUILDHALL YARD EAST

Members received a joint report of the Commissioner and the City Surveyor which provided an overview of Guildhall Yard East. This item was considered in conjunction with 13a and 13b.

#### 14. MOUNTED BRANCH

Members received a report of the Commissioner which outlined the City Police's view on the operational value of having a mounted branch in the force.

At 14:30 the meeting was extended under Standing Order 40.

#### **15.CITY OF LONDON POLICE RISK REGISTER UPDATE**

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

**16. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE** There were no questions.

#### 17. 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.

#### **18.OPERATION ADDINGTON**

Members received a confidential report of the Commissioner which outlined the Operation Addington review and its recommendations.

#### The meeting ended at 14:48

Chairman

Contact Officer: Kezia Barrass Kezia.Barrass@cityoflondon.gov.uk This page is intentionally left blank

### Agenda Item 4c

#### PROFESSIONAL STANDARDS & INTEGRITY (POLICE) COMMITTEE Monday, 25 November 2024

Minutes of the meeting of the Professional Standards & Integrity (Police) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Monday, 25 November 2024 at 11.00 am

#### Present

#### Members:

Michael Mitchell (Chair) Deputy Madush Gupta Naresh Hari Sonpar Jacqui Webster

#### Officers:

Richard Riley CBE Rachael Waldron Kezia Barrass

#### City of London Police

Assistant Commissioner Paul Betts Superintendent Carly Humphreys Chief Superintendent Sanjay Andersen Superintendent Kate MacLeod Emma Cunnington Chief Inspector Dan Murphy Luca Filipi

- Town Clerk's Department
- Town Clerk's Department
- Town Clerk's Department
- City of London Police

#### 1. APOLOGIES

Apologies were received from James Thomson. Joanna Abeyie, Jason Groves and Florence Keelson-Anfu were observing online.

#### 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 25 September 2024 were approved as an accurate record, subject to the addition of apologies from Madush Gupta.

#### 4. PUBLIC OUTSTANDING REFERENCES

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

Officers agreed to submit the Equity Diversity and Inclusion Strategy's performance dashboard to the Professional Standards and Integrity (PSI) Committee in February 2025.

**RESOLVED**, - that the report be noted.

#### 5. QUARTERLY STOP AND SEARCH AND USE OF FORCE UPDATE (Q2)

Members received a report of the Commissioner which provided a quarterly update on stop and search and use of force data for Q2 2024 – 2025.

Members queried the cause of the increase in disproportionality of Black people affected by use of stop and search. Officers outlined that the ongoing research conducted by the University of East London would provide further context but was not yet available. The Chair requested that any interim updates on the research be shared with the Police Authority Team.

**RESOLVED**, - that the report be noted.

#### 6. SUMMARY OF ACTION FRAUD PUBLIC COMPLAINTS DATA- Q2 2024/25

Members received a report of the Commissioner which provided a summary of the Action Fraud public complaints data for Q2 2024/25.

Officers outlined that the Action Fraud service would be replaced by a new system which would monitor complaints data. The Chair requested that this would be revisited in 2025, and Officers queried the appropriate governance structure to monitor this work. It was outlined that a wider governance review was in progress and would consider the most appropriate Committee to oversee and scrutinise this work. **RESOLVED**, - that the report be noted.

#### 7. EQUITY, DIVERSITY, INCLUSIVITY (EDI) UPDATE

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

Members discussed the use of online training modules and encouraged officers to include online learning opportunities in addition to in person training for staff. Members queried if the team coordinating the Equity, Diversity and Inclusion Strategy and associated work was adequately resourced. It was outlined that a Business Planning Process had recently been undertaken to assess the demand and capacity across the entire Force, which had found no need for an uplift in establishment for this particular team. It was noted that careful prioritisation would be required to increase the establishment in this particular team, as resource would have to be taken from other areas of the organisation. The Chair noted the significant work from a small team of officers, thanked them for their continued efforts and stressed the importance of this Committee seeing an implementation plan for the EDI Strategy. **RESOLVED**, - that the report be noted.

#### 8. **PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q2**

Members received a report of the Commissioner which provided an update of professional standards conduct and vetting for Q2 2024/25. Members queried the speed and efficiency of the review and noted the length of time taken to work through the recommendations of reviews. The Chair requested frontline training data on the top 5 allegation categories and the impact of this training. **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 25 September 2025 were approved as an accurate record.

# 13. PROFESSIONAL STANDARDS, CONDUCT, AND VETTING UPDATE Q2 - APPENDIX 4

Members received a report of the Commissioner which provide a non-public appendix to the professional standards, conduct and vetting update which was considered in conjunction with item 8.

#### 14. VETTING - PROGRAMME OF CONTINUOUS IMPROVEMENT

Members received a report of the Commissioner which provided outline of the vetting programme of continuous improvement.

#### 15. POLICE CONDUCT REVIEWS - RANDOM SAMPLE

Members received a report of the Commissioner which provided a random sample of police conduct reviews.

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

There were no questions.

17. 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 12:33pm

\_\_\_\_\_

Chairman

Contact Officer: Kezia Barrass Kezia.Barrass@cityoflondon.gov.uk This page is intentionally left blank

# Agenda Item 4d

#### STRATEGIC PLANNING & PERFORMANCE (POLICE) COMMITTEE Tuesday, 3 December 2024

Minutes of the meeting of the Strategic Planning & Performance (Police) Committee held at Committee Rooms, Guildhall on Tuesday, 3 December 2024 at 12.00 pm

#### Present

Members: Jason Groves (Chair) Andrew Lentin Deborah Oliver John Griffiths

#### Officers:

Richard Riley CBE Josef Shadwell Charles Smart Kezia Barrass

- Town Clerk's Department
- Town Clerk's Department
- Town Clerk's Department
- Town Clerk's Department

#### **City of London Police**

- Paul Betts-CAndy Gould-CHelen Isaac-CBrett McKenna-CEmma Cunnington-CMeg Cardy-CAmanda Horsburgh-COlivia Hogman-C
- City of London Police
  - City of London Police

#### 1. APOLOGIES

Apologies were received from Melissa Collett, Deputy James Thomson 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 26 September 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 an overview of public outstanding references. **RESOLVED**, - that the report be noted.

### 5. POLICING PLAN PERFORMANCE REPORT - Q2 2024/25

Members received a report of the Commissioner which provided the Policing Plan performance report for Q2 2024/25.

Members discussed the following points:

- Crime had increased across all crime types from the previous year data set. The Chair was keen to ensure there would be a comprehensive plan to address this

increase, to ensure that workers and residents in the City of London feel assured.

- The link between crime in the City and the night time economy was noted. Reassurance was provided by officers on the implementation, in the City, of the 'Ask for Angela' initiative.
- Members requested a detailed briefing to cover the Project Servator initiative relating to Violence Against Women and Girls be brought to this Committee.
- Officers agreed to produce a glossary of operational names as background information accompany future reports.

**RESOLVED**, - that the report be noted.

#### 6. POLICING PLAN 2025-28 UPDATE

Members received a report of the Commissioner which provided an update on the Policing Plan 2025 – 28.

The Chair requested an assessment against the previous policing plan for 2022 – 2025 and was assured by officers that this was in progress in response to a recent letter to the Commissioner from the Police Authority Board Chair.

Members noted the absence of the specific reference to 'theft' in the draft priorities for the new Plan, which did not align with the fact that theft was the most reported crime type in the City. Officers outlined that 'neighbourhood crime' was a national definition which included theft but agreed to consider how to be more explicit in the wording to reflect that theft was a priority as the highest-occurring crime type in the City of London. **RESOLVED**, - that the report be noted.

#### 7. QUARTERLY HMICFRS INSPECTIONS UPDATE

Members received a report of the Commissioner which provided a quarterly update on HMICFRS Inspections.

The Chair requested guidance on the expected outcomes in the forthcoming PEEL inspection of the City Police from officers, and it was outlined that the ambition is to evidence improvement in all areas. The Assistant Commissioner outlined his ambition to have no areas graded 'requires improvement'.

Members requested further information about the use of Power BI dashboards, and officers agreed to include a demonstration of the technology at the next Strategic Planning and Performance Committee.

**RESOLVED**, - that the report be noted.

# 8. COMMUNITY ENGAGEMENT QUARTERLY UPDATE & MEASURES OF THE STRATEGIC PLAN

Members received a report of the Commissioner which provided a quarterly update of the community engagement plan and measures of the strategic plan.

Members noted recent positive attendance at cluster panels and requested that number of attendees be included in future in reports to provide insight on effectiveness of the meeting. Officers outlined that attendance figures should not be a performance metric but could be provided for information, in future. Members suggested using business premises within the City to host cluster panels to engage local businesses, linking in with the City Belonging Project, and requested a list be shared of future dated and locations of cluster panel meetings.

**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 26 September 2024 be approved as an accurate record.

#### 13. CITY OF LONDON POLICE - STAFF "PULSE" SURVEY RESULTS

Members received a report of the Commissioner which provided the results of the City of London Police staff survey.

14. COUNTER TERRORISM DEEP DIVE: HOW EFFECTIVE ARE THE CITY OF LONDON POLICE AT WORKING WITH STAKEHOLDERS TO IMPROVE COUNTER TERRORISM SECURITY?

Members received a report of the Commissioner which provided a deep dive into counter terrorism activity and how effectively the City of London Police work with stakeholders to improve counter terrorism security.

- 15. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE** There were no questions.
- 16. 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 14:09pm

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Chairman

Contact Officer: Kezia Barrass Kezia Barrass@cityoflondon.gov.uk This page is intentionally left blank

### Agenda Item 5

Committee(s):	Dated:
Police Authority Board	4 February 2024
<b>Subject:</b> 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?	Νο
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
<b>Report author:</b> Kezia Barrass, Governance and Member Services	

#### Summary

This report calls for the annual review of the Board's own Terms of Reference.

#### Recommendation(s)

Members are invited to:

• approve, subject to any comments, the terms of reference of the Board be approved for submission to both the Policy and Resources Committee and the Court of Common Council, as set out at Appendix 1, and that any further changes required in the lead up to the Court's appointment of Committees be delegated to the Town Clerk in consultation with the Chair and Deputy Chairman

#### 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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C L h	<b>RESOLVED:</b> That the Court of Common Council holden in the Guildhall of the City of London on Thursday 25 <sup>th</sup> April 2024, doth hereby appoint the following Committee until the first meeting of the Court in April, 2025.
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#### 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,
  - o 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
- 10 (2) James Michael Douglas Thomson, Deputy
- 4 (4) Graham David Packham
- 7 (3) Emma Edhem, Alderman
- 7 (3) Tijs Broeke
- 3 (3) Helen Lesley Fentimen OBE
- 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:-

- 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) <u>Issuing agreeing</u>, each year, the <u>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, objectives in the City of London Policing Plan, which shall have regard to the views of local people, the views of the Commissioner and the Strategic Policing Requirement;</u>

- (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 <u>set approve</u> the annual budget and capital programme of the Force;
- (f) monitoring and <u>reviewing scrutinising</u> 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 <u>and scrutinising</u> of performance of the force in its capacity as National Lead Force for Fraud in partnership with the Home Office;
- (j) <u>Monitoring everseeing</u> 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;
- (I) 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.

Committee(s): Police Authority Board	Dated: February 2025
Subject: Chair's Update	Public
Report of: Tijs Broeke	For Information

### City of London Policing Plan 2025 – 2028

Thank you to those Members who were able to attend the briefing on the development of the new City Policing Plan on 28 January. As Members will have seen, I subsequently asked for any further input to be sent in time for the discussion at the February meetings of the Strategy Planning and Performance Committee and the Police Authority Board.

As Members know, 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.

#### City of London Police Budget

Following news of the Provisional Grant Settlement on 17 December 2024, the Home Office confirmed the funding settlement for the City of London Police in writing on 31 January. The letter outlined that the City will receive a maximum of £92.9m in Government grant funding for 2025/26 – an increase of £7.3m on 2024/25. This includes £1.4m of neighbourhood policing grant funding (there is an emphasis on the importance of neighbourhood policing in the Home Office paperwork). The implications of the funding settlement are being worked through now.

#### Strategic engagement

I was honoured to be able to greet Prime Minister Sir Keir Starmer as he visited Guildhall Yard East on 9 January. With the Foreign Secretary announcing a new sanctions regime to stop people smuggling crime rings and remove illicit finance, fuelling their operations, the Prime Minister convened a roundtable with law enforcement leaders to discuss a collective approach. I was very proud of how well the visit was executed – my thanks go out to all officers and staff involved in organising the visit in such quick time, and in such a professional manner. And equally proud of our Commissioner and Deputy Commissioner who shared their law enforcement perspective and economic crime expertise on the matter.

I have continued to engage widely with key organisations to develop the conversation on police reform, particularly where this impacts the City Police's national roles on fraud, economic and cyber crime. I met with Rick Muir (Director of the Police Foundation) and will continue to do so as thinking on this strand develops. I also met with Phil Brickell and Luke Charters, MPs with a keen interest in fraud and strengthening the system response and I am pleased that the conversation in this space is so healthy, as interest grows and ideas develop on what the next Fraud Strategy may cover. We also continue to work with Ministers, building our

relationship with the Fraud Minister and Security Minister in particular, and look forward to hosting them back at the City in the near future.

The City also looks forward to hosting the President of the Financial Action Task Force and the Treasury at an event in March, recognising the work of UK and Australian law enforcement using illicit finance leads to combat Child Sexual Exploitation, underlining the interconnectedness of economic crime with other serious crime types.

#### **Serious Violence Duty**

The Police Authority Team, with City Police and other local public sector partners, have begun the 'annual refresh' of the City's Serious Violence Duty strategy (first published January 2024), to be completed by the end of the financial year. As agreed with City Police, this will not contain substantive new commitments on policing (which are for the next Policing Plan) and so will be provided in due course to the Board and to the Crime and Disorder Scrutiny Committee for information.

#### **Victims Strategy**

The City Police and Police Authority Team are working on plans for the public launch of the joint Police-Corporation victims strategy, which was cleared by PAB last year. Members should note that this has already been launched internally to City Police officers and staff in December, with a significant amount of accompanying comms and promotion, and that implementation has been underway for several months.

#### **City Independent Custody Visitors (ICVs)**

I am pleased to provide an update on the Police Authority's ongoing commitment to enhancing oversight and safeguarding the welfare of individuals in custody. The Police Authority Team have made significant progress in their recruitment efforts aimed at improving diversity and representation within our current group of volunteers, successfully adding four new Independent Custody Visitors (ICVs) to the City Scheme. Custody familiarisation training is being coordinated with the ICV Scheme Manager and the City Police and are expected to take place in the next few weeks. Recruitment activities will continue to be a primary focus, and further updates will be communicated to PAB and the Professional Standards & Integrity Committee for information.

#### **Governance reform**

I have been discussing with the Police Authority Team how we might improve the effectiveness and efficiency of our governance arrangements as they apply to the work of the City of London Police. I am open to ideas which would make PAB, and its Committees, work better – reducing duplication, providing better alignment with the objectives in the City's Policing Plan, and improving the strategic scrutiny of the City Police. I will share a direction of travel on this before the May meeting of the Board to give Members a chance to give me their thoughts.

## New Year Honour for Deputy Board Chair

I would like to congratulate, formally, our Deputy Chair James Thomson on being awarded a CBE in the New Year Honours for services to policing and inclusion. This national recognition is richly deserved. He has, in my view, been an exceptional member, Chair and Deputy Chair of the Police Authority Board. He has campaigned successfully for national reforms to combat fraud and cybercrime, championed local safety initiatives including tackling violence against women and girls, and advocated strongly and authentically for diversity and inclusion. He has been a big part in ensuring that the City Police is on a journey to becoming one of the most inclusive and trusted police services in the country. The award of a CBE is welcome recognition of this public service. This page is intentionally left blank

Committee(s): Police Authority Board	Dated: 12 February 2025
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

#### **Operation Tinsel 2**

Operation Tinsel 2 was delivered over the Christmas period targeting those crime types that increase over the festive period. The operation was delivered by Response officers, Dog units, Mounted and Specials who were tasked with patrolling designated hot spot areas to prevent and respond to crime including theft and violence connected with the nighttime economy. Positive action was taken through arrests, issuing fixed penalty notices, drug warnings and recording investigations to keep the public safe. A full debrief will take place including statistics on outcomes to inform this years Operation.

## **New Years Policing Operation**

Under the leadership of Commander Umer Khan, through effective planning, resourcing and teamwork, and in partnership with the Corporation, CoLP successfully delivered a safe environment for the thousands of people celebrating the new year in the city. Colp supported the wider Pan-London Security Operation with the Metropolitan Police and other partners.

#### Keeping the City safe during County Lines Intensification Week

Colp continues the proactive disruption, dismantling and pursuit of Serious and Organised crime and those involved in Class A drug supply within the city. December saw the County Lines Intensification week in a bid to remove drugs from our streets and to support children and vulnerable adults at risk of exploitation. Overall, in the City, officers made multiple arrests, seizing a large amount of cocaine, 36 bags of cannabis, crystal meth, 20 bags of MDMA, three knives, an air pistol and £11,700 in cash.

#### Man sentenced to 31 months imprisonment for drug supply

Following outstanding work by the Criminal Investigation Department (CID), a male has been sentenced to 31 months imprisonment having pleaded guilty to possession with intent to supply Class A drugs, including cocaine, MDMA and ketamine. He was also sentenced to four months imprisonment for possession with intent to supply a Class C drug.

## Violence Against Woman and and Girls in the city (VAWG)

Colp are committed to minimising the risk of violence and harm to woman and girls in the city, and take all reports of rape and sexual assault seriously. The Public Protection Unit (PPU) have secured the conviction of a male who was sentenced to six years and five months in prison for an attempted rape of a woman in a bar in the City. Further excellent work by the PPU, has seen the conviction of a man who sexually assaulted a woman who was going home after a night out. Having pleaded guilty to two counts of sexual assault by touching and one count of sexual assault by penetration, he received a five year and four-month prison sentence and will be on license for a further three years.

#### Police Officer's praised for giving lifesaving CPR to man

Response officers; Insp Keane and PS Fraser have been praised following their vital intervention of a man who collapsed in a pub where they performed urgent medical treatment through a defibrillator and performing CPR. Their remarkable composure and actions stabilised the male before being transported by ambulance where he received further treatment before being released from hospital.

## Prolific Gym thief sentenced

Through great team work by the Proactive Crime Team and CID a prolific offender was identified, arrested and investigated for a number of theft and fraud offences. He pleaded guilty to theft and 11 counts of fraud, for which he received a Criminal Behaviour Order banning him from entering certain gyms nationwide and sentenced to 27 months imprisonment.

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#### Cycle Team

The team supported the forces response to the increased night time economy for the Christmas period, under Op Tinsel. They continue to tackle anti-social road behaviour in the city through Op Lewis, and tackling the increase of illegally adapted e-cycles on the street. In December the Cycle team completed; 6 arrests, 162 traffic offence reports/fixed penalty notices, 27 intelligence reports, seized 26 E-bike scooters seized and 21 response calls answered. The team were joined on patrol by BBC Panaroma, who were highlighting the ongoing problems with illegally modified e-bikes. This has since aired in early January 2025, showing the team and the Colp in a positive light around how we are tackling this issue.

#### National Lead Force

#### **Strategic Leadership and Engagement**

On Thursday 09<sup>th</sup> January 2024, Commissioner O'Doherty & Deputy Commissioner Adams hosted the Prime Minister, The Rt Hon Sir Keir Starmer KCB KC MP. The Prime Minister visited the City of London Police to convene a roundtable with Commissioner O'Doherty & Deputy Commissioner Adams, as leads for Fraud, Cyber and Economic Crime and other senior law enforcement officers to discuss illicit finance and organised immigration crime. During the visit, the Prime Minister also spent time with officers discussing cases the City of London Police has led and coordinated nationally. The visit was extensively covered by local and national media outlets both in print and broadcast.

On the 22<sup>nd</sup> & 23<sup>rd</sup> January 2025, T. Commander Andrew Gould gave a keynote address at the NPCC Cyber crime Pursue Conference in Birmingham. This brings together law enforcement experts from across the UK and international partners dedicated to addressing the threat posed by cyber crime.

On 12<sup>th</sup> December 2025, Deputy Commissioner Adams joined a panel discussion at the Economic Crime Congress held in London. This annual conference hosted by UK Finance brings together, the financial sector, law enforcement and the wider public sector to discuss harms and impact of economic crime.

On the 19<sup>th</sup> & 20<sup>th</sup> November 2025, Deputy Commissioner Adams hosted the Serious Organised Crime Economic Exchange (SOCEX) conference in Stratford Upon Avon focusing on financial crime. This is an annual conference with 400 delegates working in law enforcement attending. It is the largest law enforcement conference focusing on financial crime in the UK. There are presentations throughout the two-day event, given by law enforcement and the private sector with the aim of sharing knowledge and expertise.

## Operational

In November 2024, Fraud Operations successfully secured a conviction of an individual who worked with in the HR department of two separate businesses based in the City of London. The individual had paid themselves over £100,000 by generating fake invoices during their tenure with the companies. Due to the compelling case the fraud operations team compiled, the individual pleaded guilty and was sentenced to over three years imprisonment.

In December 2024, the Insurance Fraud Enforcement Department (IFED), secured convictions against three men following their unsuccessful plot to defraud and insurance company of £102,827. The two men deliberately staged a collision between two cars, including an Aston Martin and then subsequently submitted fraudulent claims. The men's sentenced ranged from 18 months imprisonment through to 100 hours of unpaid work with respect to their culpability.

In January 2025, a computer hacker who stole unreleased music from artists and then subsequently sold it online has been sentenced. The Police Intellectual Property Crime Unit Page 41 (PIPCU) launched an investigation following a referral from industry in June 2022. In January 2023, following investigation, PIPCU executed warrants at the hackers home address where vital evidence was seized. The hacker pleaded guilty to nine copyright and four computer misuse offences and was sentenced to 21 months imprisonment, suspended for 24 months.

In January 2025, a man who sold counterfeit designer products from a shop in Manchester has been sentenced to two-years imprisonment, suspended for eighteen months. In 2021, the Police Intellectual Property Crime Unit conducted a search warrant at the shop. They seized over 19,000 counterfeit items that included perfumes and watches.

## Media

In the month of December, Action Fraud ran the annual "12 Frauds of Christmas" campaign. The campaign focuses on the most prevalent frauds that are reported to Action Fraud and provides advice on how to stay safe during the festive season. The campaign was extremely successful being highlighted by national media outlets and with over 3 million people viewing the campaign across social media channels.

Committee(s): Police Authority Board	Dated: 12 February 2025
Subject: City of London Police Authority Board Revenue Budget 2025/26	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: Town Clerk and Commissioner	For Decision
Report author: Alistair Cook, Chief Finance Officer Mark Paddon, Deputy Chief Finance Officer	

#### Summary

This report presents for approval the proposed 2025/26 revenue budget for the City of London Police Authority Board (PAB), and for subsequent submission to the Finance Committee.

The proposed budget for 2025/26 is £1m net expenditure and has been prepared within the £1m Business Rates Premium envelope first allocated to the Police Authority Board in 2022/23.

#### Recommendations

Members are asked to:

- Note the latest revenue budget for 2024/25; and
- Review and approve the Committee's proposed revenue budget for 2025/26 for submission to Finance Committee.

## Main Report

#### Introduction

- 1. The Court of Common Council is the Police Authority for the Square Mile as set out in the City of London Police Act 1839. Under Section 56 of the Act, the Common Council delegated to the Police Authority Board all of its police authority functions (with the exception of the appointment of the Commissioner). The Board's role is to make sure the City of London Police runs an effective and efficient service by holding the Commissioner to account; to ensure value for money in the way the police is run, and to set policing priorities considering the views of the community.
- 2. This report sets out the proposed allocation of the £1m Police Authority Team budget for 2025/26. This ringfenced fund which has been allocated resources from the annual Business Rates Premium intake into the City of London Corporation.
- 3. The latest budget for 2024/25 and provisional original budget for 2025/26 is summarised in Table 1 below and further analysed in Appendix 1.

Table 1 - Police Authority Board	Original Budget (OR) 2024/25 £000	Latest Budget 2024/25 £000	Original Budget (OR) 2025/26 £000	Movement 24/25 to 25/26 OR £000
Net Expenditure	1,000	1,000	919	(81)
Support Services and Recharges	0	0	81	81
Total Net Expenditure	1,000	1,000	1,000	0

Note: Increases in expenditure or shortfalls income are shown as positive balances, whereas brackets are used to denote income, increases in income or reductions in expenditure.

## Latest Revenue Budget for 2023/24

4. Although the latest PAB budget remains unchanged at a net £1m, several key grant streams were announced during 2024/25 which are being managed through the outturn forecast. These include £1m of Hotspot Funding allocated to Police and Crime Commissioner's to tackle serious violence and anti-social behaviour and a £535k grant from the Government's Safer Streets Fund to facilitate a cross-borough 'bridge crime' initiative with the London Borough of Lambeth. These grant agreements will result in offsetting income and expenditure and will not impact the overall net budget position. It is not expected, however, that these grants will continue into 2025/26 and have been omitted from the 2025/26 budget below.

#### Proposed Revenue Budget for 2025/26

5. The proposed revenue budget for 2025/26 is £1m and remains within the Business Rates Premium funding envelope agreed for this Committee in 2022/23. Further detail of how this budget has been allocated can be found in Appendix 1. Members will note several variations within budget headings between 2025/26 and 2024/25 that are summarised as follows:

- £27k increase in staff costs due to the full year impact of the 4% pay award effective from 1 July 2024 and 2025/26 pay award assumption of 2%.
- (£208k) reduction in supplies and services expenditure due to the expectation that the Serious Violence Duty Home Office grant will cease with effect from 1 April 2025 which will result in a loss of £100k expenditure and associated income. There is also a reallocation of resources to formally recognise central support and recharges which have been previously omitted from the budget.
- 6. An analysis of the movement in staff related costs are also shown in Table 2 below:

Table 2 - Staffing Statement	-	Original budget 2024/25				Original Budget 2025/26	
	Staffing Full-time equivalent	Estimated cost £000	Staffing Estimated Full-time cost equivalent £000		Staffing Full-time equivalent	Estimated cost £000	
Police Authority Board Team	9.5	787	9.5	787	9.5	814	

Note to Table 2: Line management responsibility for four individuals, totalling 2.5FTEs, sits outside of the control of the Director of the Police Authority Board.

7. The 2024/25 budget also included provision for a small grants programme to fund specific crime reduction initiatives in the City. Whilst it is expected that this will continue into 2025/26, the extend of funding will be subject to affordability constraints within other PAB priorities during 2025/26.

## Conclusion

8. The report presents the proposed Revenue budget for 2025/26 for consideration and approval by Members of this Committee.

# Appendices

Appendix 1 – Committee Summary Budget

#### **Appendix 1 Committee Summary Budget**

Analysis of Service Expenditure	Actual	Original Budget (OR)	Latest Budget	Original Budget (OR)	Movement 24/25 to	Notes
	2023/24	2024/25	2024/25	2025/26	25/26 OR	
	£000	£000	£000	£000	£000	
EXPENDITURE						
Employees	634	787	787	814	27	1
Transport Related Expenses	0	2	2	2	0	
Supplies and Services	130	311	311	103	(208)	2
Third Party Payments	128	0	0	0	0	
Total Expenditure	892	1,100	1,100	919	(181)	
<b>INCOME</b> Other Grants, Reimbursements						
and Contributions	(208)	(100)	(100)	0	100	3
Fees & Charges	(10)	0	0	0	0	
Total Income	(218)	(100)	(100)	0	100	
TOTAL NET EXPENDITURE/(INCOME) BEOFRE SUPORT SERVICES AND RECHARGES	674	1,000	1,000	919	(81)	
SUPPORT SERVICES AND RECHARGES						
Central Support	68	0	0	72	72	4
Capital Charges	0	0	0	9	9	
Total Support Services and Recharges	68	0	0	81	81	
TOTAL NET EXPENDITURE/(INCOME)	742	1,000	1,000	1,000	0	

#### Notes:

£27k increase in staff costs is due to the full year impact of the 4% pay award effective from 1 July 2024 and 2025/26 pay 1. award assumption of 2%.

(£208k) reduction in supplies and services expenditure mainly due to the expectation that the Serious Violence Duty Home 2. Construction in supplies and services expendition many dis to the expendition inter the service of the expendition inter the service of the service of the expendition inter the service of the service of

4. £81k increase in central support and recharges (Guildhall Complex £13k, DiTs £36k, Support Services £23k and capital charges 39k)

<b>Committee(s):</b> Resources, Risks & Estates Committee Police Authority Board	Dated: 10 February 2025 12 February 2025
Subject: Revenue and Capital Budget 2025/26	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Commissioner of Police	RREC – For Information PAB - For Decision
Report author:	
Mark Paddon, Deputy Chief Finance Officer	
Steven Reynolds, Deputy Chief Finance Officer	
Alistair Cook, Chief Finance Officer	

#### Summary

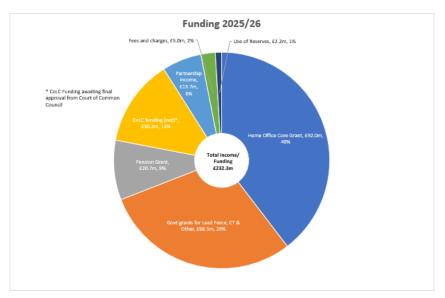
- 1. This report presents the revenue and capital budget for 25/26 following the Provisional Government Settlement being announced on 17 December 2024. Confirmation of the final Police Settlement is not expected until the end of January 2025 and a verbal update will be provided of any changes impacting the proposed 25/26 budget.
- 2. The following paper provides details of the provisional police settlement, local funding via the Business Rates Premium (BRP), mitigations to achieve a balanced budget, income and funding, capital requirements and use of reserves.
- 3. Overall, the budget provides for a core establishment of 954 full time equivalent (FTE) Police Officers (plus 30 Regional Organised Crime Unit posts), 539 (FTE) Police Staff and 261.5 temporary funded roles (£163.3m) and non-pay (£69m) budgets totalling £232.3 These resources are provided to deliver Policing Plan priorities for both territorial policing and national lead functions, in areas such as fraud and cybercrime, with strong support for victim care.

Table 1 provides a summary of the 24/25 and the proposed revenue budget for 25/26.

Table 1Summary Revenue Budget24/25 and 25/26	24/25 Latest Budget £m	25/26 Projected Budget £m	24/25 vs 25/26 Budget £m
Expenditure	208.5	232.3	23.8
Income	(94.4)	(110.1)	(15.7)
Core Funding (Chief Officer cash limited budget)	(114.1)	(122.2)	(8.1)
Income & Core Funding (net of capital charges)	(208.5)	(232.3)	(23.8)
(Surplus)/Deficit	-	-	-

4. The 25/26 budget shows an increase of £23.8m compared to 24/25 which is mainly due to an increase in funding and growth attributable to National Lead Force activities (£15.5m) and additional core Government Grant income of £8.1m, including a net increase in Business Rates Premium (BRP) allocation (agreed in 23/24) of £1.5m, of which £1m is ringfenced for Secure City run costs. A full breakdown of funding is shown in figure 1 below.

# Figure 1: 2025/26 Funding Breakdown



5. Whilst the 25/26 budget is shown as balanced, the latest Medium Term Financial (MTFP), as presented to members of the Resource, Risks and Estates Committee in November 2024 and Police Authority Board (PAB) in December 2024, identified £7.6m of additional inflationary and other pressures impacting the 24/25 budget, which were fully mitigated. Since this time there have been a number of new pressures impacting the 25/26 budget including changes to National Insurance thresholds and employer contribution rate, a 1% higher than anticipated 24/25 staff pay award, implementation of a London Allowance increase for officers and 0.8% increase in 25/26 pay award assumptions due to assumed forward funding of the 25/26 pay award within the

provisional settlement adding £5.8m of further pressures to the 25/26 budget. In addition, the proposed budget includes best estimates for the reprogramming of the Fraud and Cyber Crime Reporting and Analysis Service (FCCRAS) implementation, which has identified an initial budget gap of £1.5m which is likely to require further recourse to internal loan funding. These pressures are summarised in Table 2 below.

Table 2 – Budget Pressures	
25/26 Budget Pressures (Revenue)	2025/26 £000
Officer Pay Inflation	3,000
Staff Pay Inflation	1,500
Loss of TfL Funding for Roads Policing	1,400
Non-Pay inflation	1,200
Other	500
Sub-Total Budget Pressures from December MTFP (Appendix 4)	7,600
National Insurance Increase	2,000
1% Higher staff pay award from 24/25	400
London Allowance Increase	1,500
Forward funding of 25/26 pay award 2.8% compared to 2%	400
Neighbourhood Policing Uplift	700
Overtime for events and protest work demands (NICC related)	800
Estimated Net FCCRAS budget shortfall	1,500
Sub-Total New Budget Pressures	7,300
Total Pressures	14,900

#### .... Ideat Drees

6. The MTFP, which was presented to Members prior to the 24/25 Police Settlement being communicated assumed that Home Office funding would increase by £2.1m the subsequent Home Office announcement has provided for £4.5m more funding than expected (para 11), While the 25/26 provisional settlement has provided £6.5m additional funding over 24/25, much of this was to cover the increased costs of the 24/25 pay award, employers National Insurance contributions and an uplift in Neighbourhood police officers, which has left a residual gap of £1.3m per annum in the Police budget. Of this £0.3m has been mitigated through a budget reprioritisation, but £1m remains unmitigated and an unidentified saving line has been included in the 25/26 budget. To eliminate this cost pressure extra mitigations will be required, with options including a further increase to the Business Rate Premium, subject to Court of Common Council approval, and/or the identification of other core savings, although options for savings are very limited. Separate to this, the budget also includes a £1.5m unidentified savings line in respect of net estimated FCCRAS revenue cost pressures (para 18 refers). This is due to the revised delivery approach and will likely require recourse to additional internal loan funding subject to any programme savings being identified during 25/26.

7. In balancing its finances over the last two years, CoLP has delivered major savings, with cumulative, budgeted savings over the last five years of £19.9m (16.9% of the 2024/25 Net Revenue Budget) - including pay and overtime reductions, non-pay savings and increased charges for funded work. The options for CoLP to make further savings and achieve a balanced budget in 25/26 are, therefore, limited by the continued requirement to maintain officer numbers at national head count levels, contractual obligations and the level of savings delivered in recent years, without impacting operational policing. Table 3 below summaries the mitigations which have been included in the proposed 25/26 budget, including use of a £1.4m Fraud and Cyber Crime Reporting and Analysis (FCCRAS) provision established in 23/24, a £0.3m increase in the contribution from funded work towards inflation and overheads, growth in funded activities of £1.2m to mitigate partnership funding loss, further pay and non-pay savings of £0.7m and a £1.5m allocation from the 23/24 Business Rates Premium (BRP) increase.

2025/26 Budget Mitigations	2025/26 £000
Increase in Home Office Core Funding	6,600
Increase in the Business Rate Premium (2024 allocation)	1,500
Use of residual FCCRAS provision	1,400
Higher proportion of more junior PCs	200
Growth in 'Funded work' mitigating loss of partnership funding	1,200
Increased recovery of overhead from 'Funded work'	300
Further Non pay savings	700
Adjustment for phasing of staff recruitment to full establishment	500
Unidentified Core Saving	1,000
Unidentified Savings/funding solution for revised FCCRAS delivery approach	1,500
Total	14,900

## Table 3 – 2025/26 Budget Mitigations (Updated for Provisional Settlement)

## Capital Programme 2025/26

8. A summary of forecast capital expenditure and funding for 2021/22 to 2026/27 is shown in table 4 below. This shows a proposed capital programme for 2025/26 of £13.065m, comprising £7.000m on FCCRAS, £2.447m on projects which commenced in prior years, £0.280m for new prioritised projects commencing in 2025/26 and £0.838m remaining uncommitted/available for other new projects. All new projects will be subject to business case approvals, supported by assessments on deliverability and affordability. The 2025/26 capital programme also provides £0.890m for cyclical replacement, £1.000m for Future Police Estates Programme (FPEP) technological replacement, and £0.610m for contract assessment, continuous improvement and feasibility work. The proposed capital programme is broken down and further explained in paragraphs 39 to 61 of this report.

# Table 4 – CoLP Capital Programme

CoLP Capital Programme	21/22 £000	22/23 £000	23/24 £000	24/25 £000	25/26 £000	26/27 £000	Total £000
Projects:							
FCCRAS	3,970	5,392	12,396	7,780	7,500	-	37,038
Other ongoing projects	2,960	1,194	708	1,768	2,447	422	9,499
Proposed new projects 2025/26	-	-	-	-	280	238	518
Remaining uncommitted funds	-	-	-	391	838	1,290	2,519
Standing Items:						,	
Cyclical Replacement	1,000	545	872	2,358	890	750	6,415
FPEP tech repayment	, _	-	-	-	1,000	1,100	2,000
Contract assessment	-	-	-	-	100	100	200
Continuous improvement	-	-	-	-	310	1,000	1,310
Feasibility	-	-	-	-	200	200	400
TOTAL EXPENDITURE	7,930	7,131	13,976	12,297	13,565	5,000	59,899
Funding:							
City Fund Ioan (FCCRAS)	-	-	-	3,017	3,500	-	6,517
City Fund loan (other projects)	2,941	1,401	(137)	595	1,065	-	5,865
Home Office (FCCRAS)	3,970	3,000	11,200	2,804	4,000	-	24,974
City Fund	,	, 110	174	-	-	-	284
City ULEZ loan	1,000	-	-	-	-	-	1,000
POCA	19	38	7	881	-	-	945
Direct revenue financing	-	2,582	2,732	5,000	5,000	5,000	20,314
TOTAL FUNDING	7,930	7,131	13,976	12,297	13,565	5,000	59,899

9. The table also shows a forecast outturn for 2024/25 of £12.297m which is explained in a third quarter (Q3) budget monitoring report on this agenda.

#### Recommendations

Members of RREC are asked to:

Note the report and:

- the 2025/26 City of London Police (CoLP) Revenue Budget; and
- the 2025/26 CoLP Capital Programme

Members of the Police Authority Board are asked to approve:

- the 2025/26 CoLP Revenue Budget; and
- the 2025/26 CoLP Capital Programme

## Main Report

## Relevance to the Policing Plan

- 1. The primary purpose of the development of the budget and Medium-Term Financial Plan (MTFP) is to direct resources to deliver the objectives set out in the Force's Policing Plan:
  - To keep those who live, work and visit the City safe and feeing safe
  - To protect the UK from the threat of economic and cybercrime
  - To put the victim at the heart of everything that we do
- 2. The development of the 2025/26 budget is focused on the Policing Plan, building on the 2024/25 business planning process, to ensure that finite resources are allocated to enable delivery of the above key objectives.
- 3. The Force's Income Strategy, introduced in 2019 and refreshed in 2023/24, was designed to assist in the delivery of a sustainable budget going forward through seeking full cost recovery from funded units and commercial / non-core / change activity wherever possible. In the 25/26 budget additional income of £4.45m through recharging of costs has been included as part of a package of measures to close the budget gap, noting the historically cash flat nature of several National Lead Force grants and agreement by the Home Office to increase funding for overheads by £3.5m for 'funded' work in 2024/25. The affordability and sustained resourcing of funded/non-core activities will be dependent on securing this uplift in funding which is a key risk to the delivery of the Policing Plan. Work will continue in 2025/26 to drive income recovery from funded work through engagement with funders to ensure deliverables are commensurate with the financial resources being made available.

## National Context, Police Funding Settlement and Core Funding

- 4. The Force continues to operate in an environment of considerable uncertainty and financial challenge. While the 24/25 budget was balanced by a combination of increased local funding from a reset of the Business Rates Premium allocation and additional City of London Police (CoLP) mitigations. Since then, CoLP has experienced or forecast a range of new pressures which will impact 25/26 budget setting, which includes:
  - Pay and non-pay inflation in 24/25 being significantly above assumptions creating £7.6m of pressure for 25/26 and future years.
  - a £1.5m increase in pay costs due to an increase in the London Allowance for officers with effect from 1 April 2025.
  - The 24/25 pay award for staff exceeding budget expectations by 1% leading to a downstream cost pressure of £0.4m per annum.
  - Increasing pressure from national events, protest activities linked to the City, as a National and International Capital City impacting overtime costs £0.8m.
  - An increase in employer National Insurance Contributions, creating a cost pressure of £2m.

## Police Funding Settlement

- 5. On 17th December 2024 the Home Office announced the provisional police funding settlement. Table 6 provides a line by line breakdown of the provisional settlement compared to 24/25. The key points are :
  - <u>Police Uplift Programme (PUP) ringfence</u> a £0.5m reduction in the Police Uplift funding subject to ringfencing which puts £2.6m funding at risk (vs £3.1m in 24/25).
  - <u>Additional recruitment top up grant</u> City's officer uplift target was increased in 24/25 by 10 (from 986 to 996 headcount), with £0.5m additional funding being provided (which will be fully offset by additional costs). As in 2024/25 a key concern remains that the Home Office settlement continues to level risk to police finances through the ringfencing of core funding which is subject to maintaining officer uplift targets. The Home Office have confirmed that performance against the 996 target will be measured on 31 September and 31 March. Any shortfall against the maintenance level of 996 will be subject to £40,000 per officer being withheld from the Uplift grant, up to a maximum tolerance of 30 officers; this means that if CoLP were to miss the uplift target by 30 at both checkpoints, the entire £2.5m grant would be lost.
  - <u>Pay award grant</u> CoLP received extra funding during 24/25 of £1.2m for part-year effect of the 2023 officer pay award (4.75%). It is assumed that the £2.1m full year effect has been rolled into core grant for 24/25, but it is not clear what has been included in the 25/26 Provisional Settlement in relation to the 2025 pay award. The allocation of this grant is based on funding formula shares and so it does not provide for the increased costs of National or funded resourcing. With the latter provided for via a Home Office top slice to national pay award funding and subject to separate grant claim arrangements.
  - <u>National Insurance grant</u> CoLP has received a £1.5m National Insurance impact grant to compensate the Force for the additional employer contribution costs from 1 April 2025. This is to recognise an increase to the employer contribution rate from 13.8% to 15% and lowering of the threshold. The impact of the NI increase across CoLP's core and funded work is estimated to be £2m, which may result in a cost pressure if the funded element cannot be recovered through specific grant agreements.
  - <u>Precept grant</u> (in lieu of City's inability to precept) has increased by £1.1m which, as in previous years, is linked to Government providing increased Precept flexibility elsewhere (£14 in 25/26).
  - <u>Pensions grant</u> In 24/25 the Home Office provided an additional £2.4m of funding to CoLP following a decision to increase employer pension contributions for officers from 31% to 35.3% from April 2024, with total annual pension grant funding totalling £3.2m. This has reduced in 25/26 by £0.4m to £2.8m and is due to a top slice for Counter Terrorism activities which are subject to separate grant claim arrangements.
  - <u>National & International Capital City (NICC) grant</u> (provided to City and Met Police) - has increased by £1.7m to £6.5m, having remained cash flat at £4.8m since April 2019. The NICC grant was awarded to recognise the cost of additional policing activity arising from events and demonstrations

related to the City's historic location and national and international status, excluding the costs of counter terrorism activity which is subject to a separate specific grant.

 <u>Neighbourhood Policing Uplift</u> In 25/26 the Home Office have committed to provide £100m of additional funding to increase Neighbourhood Policing of which CoLP has been allocated £0.7m. At the time of writing, however, the Home Office have not yet provided clarification on their expectation of officer uplift numbers from this funding.

#### Local Funding – Business Rates Premium

- 6. In March 2024 the Court of Common Council approved an increase in the Business Rates Premium by £0.4p (in the £) to move to parity in local funding allocations compared to the national average, including the rent-free benefit provided by the Corporation and Home Office Precept Grant. The 24/25 BRP allocation provided for a £1.5m increase in funding for the Police budget in 25/26, from £28m to £29.5m per annum. This <u>excludes</u>:
  - £0.7m Contact Centre funding,
  - £1m of BRP funding for the Police Authority Board; and
  - £1m of BRP funding for the Security City Programme (SCP).
- 7. However, from a balanced position at April 2024, significant further pressures and risks have arisen, in particular from the Fraud and Cyber Crime Reporting and Analysis Programme, termination of £1.4m per annum TfL funding, higher pay award, allowances and increased operational demands and pressures (Command and Control, data storage, energy and utilities) a residual gap of £1m per annum in the Police budget has emerged.
- 8. With cumulative savings plans over the last five years of £19.9m (16.9% of Net Revenue Expenditure) the opportunity for further savings without significant operational impacts are limited. It should be noted that precept flexibility for other forces has been set at higher than expected £14 and although the City has moved towards parity in local funding with the national average it remains well below the local funding % for other South East forces (excluding the MPS). Without additional local funding, it is likely that the £1m gap in the Force budget, mainly relating to an unfunded London Allowance cost, the 2024 staff pay award exceeding budgeted expectations and future year pay awards will remain unmitigated without service impacts.
- 9. Should the Court of Common Council resolve to approve an increase in the BRP for 25/26, any increase in the allocation to the Force above the £1m revenue deficit would enable an acceleration in loan repayment relating to the legacy capital programme and other exceptional borrowing requirements, where recourse to loan funding is necessary and appropriate. However, it is expected that CoLP capital priorities will normally be managed within a £5m per annum for direct revenue financing (DRF) envelope combined with £1m per annum of loan repayment.
- 10. The estimated annual operating cost of the Secure City Programme (SCP) is expected to be c.£2m which will be funded through a combination of £0.4m existing police resources (through decommissioning the current Information management

system (IMS) and disaster recovery system (DRS), £1m of BRP funding, up to £0.5m of funding from the City's on-street parking reservice and a potential future contribution from City Bridge Foundation (subject to evidencing positive impact on policing the bridges). Following implementation delays it is now expected that the SCP will move to a fully operational phase during 25/26 with responsibility for managing the service transferred to CoLP. All service income and expenditure will be ringfenced in CoLP's revenue budget.

- 11. The grants awarded as part of the police funding settlement and from the City of London Corporation constitute "core" funding and is held by the Police Authority until the end of the financial year. Historically this has been referred to as the "Chief Officer's Cash Limited Budget" for local authority accounting purposes and provide an in-year Net Budget of £123.2m, an increase of £8.1m from 2024/25, after adjusting for internal loan repayment of £1.0m which is shown as negative financing for Local Authority budgeting. Of the £8.1m increase, £6.6m relates to an increase in Home Office core funding and a £1.5m increase in the baseline BRP funding agreed as part of the 2024 BRP increase.
- 12. Funding for the Force also includes £110.1m of specific government grants, partnership income, fees and charges and the use of reserves (2024/25: £94.4m). This excludes £29.9m of funding distributed by CoLP to Forces and ROCUs (2024/25 £30.6m) The increase of £15.7m compared to 24/25 is mainly due to:

Government Grant income (note xii) - £16.2m increase mainly due to:

- Fraud & Cyber Crime Reporting & Analysis Service (FCCRAS) £9.9m linked to the revised delivery plan.
- Anti-money Laundering Act (AMLAR) funding for the Domestic Corruption Unit, Fraud Reform programmes and Co-ordination - £4.8m increase.
- An increase in Police Pension deficit funding of £2.1m.
- Less: £0.8m of Hotspot Funding which was part of the £1m provided to Police and Crime Commissioners in 2024/25 to tackle anti-social behaviour.

Partnership Funding (note xiii) – £1.0m decrease, mainly due to:

 The cessation of TfL funding for Roads Policing £1.2m net of a £0.5m increase in contributions from the Force's three funded units: the Insurance Fraud Enforcement Department (IFED), the Dedicated Card and Payment Crime Unit (DCPCU) and the Police Intellectual Property Office (PIPCU) in line with increasing service costs. If this increase in partnership income is not realised it will necessitate a corresponding reduction in Funded Unit pay and non-pay costs.

# Fees and Charges (note xiv) - £0.3m increase

• Mainly due to a £0.3m increase in recharging of staff costs to capital (change) projects. This is in accordance with the 2023 Corporate Services Review design principles with roles being aligned to demand drivers and funded workstreams.

13. Subject to the final settlement Table 6 sets out the overall revenue funding envelope which will be available to resource policing services in support of the Policing Plan.

	2024/25	2025/26	Change
CoLP Funding 2024-25 & 2025-26	£m	£m	£m
2024-23 & 2023-20			(Better)/
			Worse
Core grant	(66.3)	(68.8)	(2.5)
National Insurance Impact grant	0.0	(1.5)	(1.5)
Council Tax Freeze Grant	(0.3)	(0.3)	0.0
NICC Grant	(4.8)	(6.5)	(1.7)
Precept Grant	(7.4)	(8.5)	(1.1)
Pensions Grant	(3.2)	(2.8)	0.4
Ringfenced Uplift Funding	(3.1)	(2.6)	0.5
Neighbourhood Policing Uplift	0.0	(0.7)	(0.7)
Uplift Additional Recruitment Top Up	(0.5)	(0.5)	(0.0)
Less £0.2m Council Tax Freeze Grant to City Fund	0.2	0.2	0.0
Sub-Total police grant funding	(85.4)	(92.0)	(6.6)
Business Rates Premium	(28.0)	(29.5)	(1.5)
Corporation - Contact Centre	(0.7)	(0.7)	(0.0)
Secure City	(1.0)	(1.0)	0.0
Sub-Total Business Rates Premium/CoL funding	(29.7)	(31.2)	(1.5)
Total Core Funding	(115.1)	(123.2)	(8.1)
Specific Grants*	(73.0)	(89.2)	(16.2)
Partnership Funding	(14.7)	(13.7)	1.0
Fees and Charges	(4.7)	(5.0)	(0.3)
Use of Reserves	(2.0)	(2.2)	(0.2)
Sub-Total Income and use of Reserves	(94.4)	(110.1)	(15.7)
Gross Funding & Income	(209.5)	(233.3)	(23.8)
Less Capital Financing Charges	1.0	1.0	0.0
Net Funding & Income	(208.5)	(232.3)	(23.8)

# Table 6 – Funding and Income

\* Excludes £29.9m of National Lead Force grants which are transferred to other forces to support their fraud, cybercrime and anti-money laundering activities.

## Revenue Budget for 2024/25, Projected Outturn and 2025/26 Budget

#### Table 7 – Revenue Budgets 2024/25 & 2025/26

CoLP Revenue Budgets 2024/25 and 2025/26	24/25 Latest Budget	24/25 Actuals	24/25 Projected Outturn	24/25 Variance vs Budget		25/26 Projected Budget	25/26 vs 24/25 Budget	Notes
		Q3	Q3	(Better) / Worse			(Better) / Worse	
	£'000	£'000	£'000	£'000		£'000	£'000	
Police Officer Pay	80,004	58,202	77,854	(2,150)		87,641	7,637	(i)
Police Staff Pay	42,189	25,948	36,871	(5,318)	F	47,360	5,171	(ii)
Police Officer Overtime	2,655	2,700	3,625	970		3,454	799	(iii)
Police Staff Overtime	231	255	325	94		232	1	
Temp/Agency	1,113	1,217	1,271	158		949	(164)	(iv)
Other Employee Related Expenditure	2,930	1,543	2,675	(255)		3,039	109	
Pension Deficit	18,600	0	19,500	900		20,700	2,100	(v)
Total Pay	147,722	89,865	142,121	(5,601)		163,375	15,653	
Premises	4,197	2,275	4,463	266		3,321	(876)	(vi)
Transport	2,807	646	2,692	(115)		506	(2,301)	(vii)
Supplies and Services	35,089	36,571	50,826	15,737		46,933	11,844	(viii)
Third Party Payments	9,622	7,487	9,917	295		10,641	1,019	(ix)
Unidentified Savings/cost pressures	0	0	0	0		(2,536)	(2,536)	(x)
Support Services	3,365	116	3,408	43		3,404	39	
Capital Charges	5,065	0	5,065	0		5,065	0	
Recharges across Funds	28	0	28	0		28	0	
Recharges within Fund	67	0	67	0		60	(7)	
Transfer to Reserve	500	0	500	0		1,500	1,000	(xi)
Total Non-Pay	60,740	47,095	76,965	16,225		68,922	8,182	
Total Expenditure	208,462	136,960	219,086	10,624		232,297	23,835	
Specific Grants	(72,926)	(28,689)	(84,054)	(11,128)	_	(89,213)	(16,287)	(xii)
Partnerships	(14,691)	(8,713)	(14,335)	356	┝	(13,699)	992	(xiii)
Fees & Charges (inc capital projects)	(4,710)	(1,044)	(4,017)	693		(5,001)	(291)	(xiv)
Transfer from Reserves	(2,049)	0	(2,593)	(544)		(2,186)	(137)	
Income	(94,376)	(38,446)	(105,000)	(10,624)		(110,100)	(15,723)	
Core Funding	(114,086)	(98,514)	(114,086)	(0)		(122,197)	(8,112)	
Total Income & Funding	(208,462)	(136,960)	(219,086)	(10,624)		(232,297)	(23,835)	
Net (Under)/Overspend	0	0	0	0		0	0	

14. The proposed 2025/26 budget has been prepared within the resources set out above. Table 7 above summarises the 2024/25 net revenue budget, projected year end outturn and variances and the 2025/26 budget. Underspends / positive variances are shown in brackets.

## Revenue Budget for 2024/25 and Projected Outturn

- 15. The 2024/25 Quarter 3 revenue outturn is presented as a separate paper on today's agenda. This shows a breakeven outturn position, with both expenditure and income expected to be £219.1m. This compares to original expenditure and income budget of £208.5m. The variance of £10.6m 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£15.3m and is reflected in the additional supplies and services expenditure shown in Table 1. The residual FCCRAS cost pressure on CoLP's budgets, after considering a 50:50 risk share arrangement with the Home Office and the application of additional overhead recovery, remains at £1.2m with the further extension cost pressures forecast at Q3 absorbed by vacancy savings due to the revised trajectory of staff recruitment into the FCCRAS programme. At this stage it is expected that this residual £1.2m cost pressure will be mitigated using a specific earmarked Action Fraud reserve (£0.8m) and core savings (£0.4m) without recourse to use of the General Reserve, however, this position will be kept under review should further pressures arise from programme replanning.
- 16. Whilst a balanced outturn forecast has been maintained at Q3 24/25, 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 24/25 revenue budget is now at its limit for absorbing any additional cost pressures.

# Proposed Revenue Budget for 2025/26

17. The proposed 2025/26 budget has been prepared within the resources set out in Table 6 above. Overall there is an increase of £23.8m between the 2024/25 latest approved budget and the 2025/26 original budget. Further details of support services and capital charges are shown in Appendix 1. The significant movements, budgetary assumptions, risks and opportunities are explained below.

# Fraud and Cyber Crime Reporting and Analysis Service (FCCRAS)

18. Recognising that, at this point of budget setting, FCCRAS is in the process of reprogramming, best estimates have been included within this budget. Current service extension costs estimated at £12m have been built in, to be funded by way of a 50/50 "risk share" with Home Office. Also increased capital costs have been estimated at £ £6m, to be funded two thirds Home Office and one third CoLP. It is likely that CoLP will require recourse to additional internal loan funding of up to £5m for its share of increased capital costs plus funding gap on its share of extension costs, particularly if the whole 12 month extension agreement is required. CoLP's loan balance, should the full £5m, be required would be around £11m at 31/03/26. This remains close to the expected £10m loan position, so there should be minimal extra exposure on CoLP finances or risk to the City, which will be reinforced if additional Business Rate Premium is allocated specifically to fast-track loan repayment.

# **Risks and Opportunities**

19. There are several financial risks and opportunities which may impact the 2025/26 budget.

Risks include:

- Ringfencing of Government Grants, with dependency on maintaining officer uplift levels.
- Pay awards and non-pay inflation being higher than estimated.
- Unfunded pay awards, including London Allowance and the unknown impact of Ambition 25.
- Higher rank / grade mix as employees progress through pay scales
- Loss of income sources.
- Sustaining cost recovery from funded work particularly in relation to National Lead Force funding which provides an element of the City's officer uplift target.
- FCCRAS implementation and any implications arising from the updated detailed delivery plan.
- The levels of recruitment needed to deliver against both the financial and operational Policing Plan, in particular achieving the staff recruitment trajectory as a risk to realising available National Lead Force funding.
- The ability to deliver the mitigations included within the budget within the timeframes set and also the level needed whilst delivering the required levels of service.
- The ability of the Force to deliver the Capital Programme.

# Opportunities:

- Further progress on cost recovery for 'funded' work.
- Increased efficiencies from Projectivity Review and implementation of Business Planning outcomes.

# Pay and Workforce Planning

20. The pay budget for 2025/26 is £163.3m, this is an increase of £15.6m from 2024/25. The main factors for the increase include:

## Notes (i) & (ii)

- the impact of pay inflation being higher than anticipated in 2024/25 being baked into subsequent year's pay. Officers 1.75% and staff 1% above budgetary assumptions with corresponding full year impact of £1.4m & £0.4m respectively.
- For 2025/26 the budget assumes a 2.8% pay award increase for officers and staff in accordance with the National Police Chief's Council and The Police and Crime Commissioners Treasurers' Society (PACCTS), adding £1.3m per annum to Officer and £0.9m to staff pay.
- The increase in employer National Insurance contributions from 13.8% to 15% from 1 April 2025 is expected to increase officer pay by £1.2m and staff pay by £0.8m
- The impact of incremental pay progression increasing pay by £1.2m for officers and £0.5m for staff

- An increase in officer pay by £1.5m per annum following an increase in the London Allowance of £1,250 payable to officers from 1 April 2025.
- Police Officer pay also includes a £0.7m provision relating to the Home Office's Neighbourhood Policing Guarantee and is matched by additional core funding.
- The 2025/26 pay budgets also include a £0.7m core budget correction in respect of the Insurance Fraud Enforcement Department (IFED), with officer pay and staff pay increasing by £0.45m and £0.25m respectively.
- a £2.3m increase in staff costs relating to planned growth in funded work including the Anti-Money Laundering Act Regulations (AMLAR), Enhanced Cyber Reporting (ECRS), and Fraud Reform. This growth is matched by an increase in Specific Government Grant Funding.
- The officer pay budget continues to include an officer adjustment provision of £0.5m to manage the headcount impact of the additional 10 Uplift posts and the risk of overshooting against the 996 target. No allowance is made of officer vacancies due to the requirement to maintain the workforce at Uplift Maintenance levels.
- For staff pay, however, a £0.65m "natural" vacancy factor has been maintained in the budget to recognise savings due to the time lag between leavers and joiners, based on an average of 15FTEs per annum. In addition, the staff pay budget includes a £0.5m mitigation to recognise the current trajectory of "core" staff recruitment which is not expected to reach full establishment until October 2025. This budgetary mitigation is expected to diminish as the intake of staff increases to full establishment.
- Note (iii) an increase in police officer overtime budgets of £0.8m, to recognise the challenges of policing in a National and International Capital City as potential focal point for events and protest activities. This increase in overtime budgets will be held centrally and allocated based on irrecoverable overtime demands. Overtime will continue to be monitored through the Force's internal Strategic Finance Board.
- Note (iv) a £2.1m increase in the pension deficit provision. This is to align the budget with the current 6-year pension forecast and is offset by a corresponding reduction in Home Office grant income.
- Note (v) Agency budgets are assumed to decrease by £0.3m as permanent recruitment into vacancy posts diminishes the requirement for temporary staff to backfill roles.
- 21. The 2025/26 pay budget is based upon the following full time equivalent (FTE) numbers:

	Officer FTE	Staff FTE	Total FTE
2024/25 Baseline	946	536.2	1,482.2
SOC Uplift (Regional Organised Crime Units)	30.0	0	30.0
NPCC Cybercrime	9.0	2.8	11.8
Changes	(1.0)	-	(1.0)
Establishment at 1st April 2024	984.0	539.0	1,523.0
Temporary Funded Roles	56.9	205.6	262.5
TOTAL Budgeted Workforce	1,040.9	744.6	1,785.5

#### Table 8 – Workforce Establishment

- 22. The NPCC Cyber Portfolio (11.8FTE) and 30 FTE Police Uplift SOC posts are shown in the overall establishment in Table 8 and are included in the Home Officer Uplift headcount target of 996. The Cyber Portfolio team and the Police Uplift SOC posts are funded from specific grants and claimed in arrears from Home Office. Of the 30 SOC posts, 2 will be employed directly by CoLP and the remaining 28 are based in the Regional Organised Crime Units (ROCUs). The majority of the Cyber Portfolio will be recruited via seconded officers and agency staff. The budget also assumes a further 262.5 temporary funded roles mainly related to delivery of NLF lead force activities.
- 23. The budget assumes resourcing levels for 25/26 will be an establishment of 1,523 FTEs, comprising 984 FTE Officer and 539 staff roles, plus 262.5 temporary funded roles. The reduction by 1 in the officer FTE relates to a secondment which was included in the budgeted establishment but has been removed as the funding for the post has ended. Based on the experience of 23/24 and 24/25 an officer FTE of 984 should provide for a head count of 996. This is because there are several part time officer posts which count as 1 when measuring achievement against the Uplift Maintenance target of 996. The number of part time posts and interaction with the achievement of the Uplift Maintenance target will be kept under review. In addition to the budgeted headcount above it is expected that there will be a further increase in officer roles because of the Neighbourhood Policing Guarantee included in the Provisional Settlement. The Home Office have not yet communicated the officer expectations based on the £0.7m allocation to CoLP but it's not inconceivable that this expectation could equate to 8-10 additional PCs.
- 24. Pay inflation assumptions remain one of the largest areas of risk. Based on the latest advice from the National Police Chief's Council and The Police and Crime Commissioners Treasurers' Society (PACCTS), a provision of 2.8% has been provided for both officers and 3 staff. While an assumption of 2% had been included in the November 2024 MTFP, it is not clear whether the Provisional Settlement includes forward funding of the 25/26 pay award, which the Government currently recommends as 2.8%. In prior years, the Home Office has provided a separate pay award grant to compensate forces for the recommendations agreed following the annual recommendations from the Police Remuneration Review Body (PRRB), however, it is not certain whether this will be the case for 25/26. For prudency,

therefore, a higher rate of pay inflation has been included in the Police budget of 2.8% compared to the 2% MTFP assumption. For funded work it is assumed that any inflationary consequences because of the 25/26 PRRB recommendations will be provided for through a top slice to the overall Police funding envelope for national policing priorities. If this doesn't prove to be the case, then programme deliverables and resourcing will need to be reviewed to ensure that each programme operates within the available funding.

## Non-Pay

- 25. Note (vi) The premises budget for 25/26 is £3.3m, a reduction of £0.9m compared to 24/25. This is mainly due to the removal of a one off £1.3m increase in the premises budget in 24/25 to allow for cyclical maintenance works at Bishopsgate and New Street to prolong the operational viability of these site ahead of delivery of the Future Police Estates programme. This £1.3m reduction in breakdown budgets net of £0.5m increase in provisions for energy, utilities and cleaning costs.
- 26. Note (vii) The Transport budget for 25/26 is £0.5m, a decrease of £2,3m compared to 24/25. This is principally due to the virement of the budget for the Rail Delivery Group (ATOC) discounted travel scheme from a "Transport" to Third Party Payments to better align the budget to the reporting requirements of CIPFA's Police Objective Analysis.
- 27. Note (viii) The Supplies and Service budget for 25/26 is £46.9m, an increase of £11.8m compared to 24/25. A breakdown of the budget is shown in Appendix 2. The increase of £11.8m is mainly due estimated FCCRAS extension costs of £12m referred to in paragraph 18.

Several other non-pay pressures have also been managed through budget reprioritisation within the overall funding envelope, including: -

- A £0.3m increase in Local Policing Information Technology budgets to provide an expected increase in the cost of the Command-and-Control service provided by the Metropolitan Police Service for emergency call handling. This proposed increase, with effect from 24/25 has been noted in the quarterly monitoring reports to this committee.
- An increase in software licencing, data storage costs, security and external services, of £0.4m due to inflation and increased demand.
- 28. Note (ix) The third-party payments budget for 2024/25 is £10.6m an increase of £1.0m from 2024/25. This is mainly due to the transfer of £2m Rail Delivery Group charges from "Transport" budgets (para 26), net of a £1m reduction for funded activities. Third party payments include the cost of annual IT Service Level Agreement (SLA) with the City Corporation (£6.2m) as well as the annual Occupation Health Service subscription, Forensic Services contract costs and payments to other forces for seconded officers. A breakdown of third-party funding is show in Annex 2.

- 29. Note (x) Included within non-pay is £2.5m of unidentified savings/additional funding requirements. This has been necessary to balance the 25/26 budget noting the £1m residual core deficit for additional pay pressures and an estimated £1.5m FCCRAS budgetary shortfall, both of which were outside of the November 2025 MTFP (para 6-12 ref).
- 30. Note (xi) The 25/26 budget assumed an increase in provisions and contingencies to create a specific reserve to smooth the revenue impact of estates, cyclical maintenance and other running cost risks ahead of the move to the new police estate. Included within the £1m increase in the transfers to reserve is also a risk provision for the budgetary impact of the City's Ambition 25 programme, which is a review of staff reward and recognition. These provisions are considered as necessary and appropriate to help manage emerging estates and staff pay liabilities.

## Income

- 31. Note (xii) The force receives income and funding from a range of sources, with total budgeted income amounting to £232.2m in 2025/26 as detailed in the non-public Appendix 3, to this report. Due to the sensitive nature of the various funding streams, this is presented as a non-public appendix. CoLP funding primarily comes from its Home Office core grant, amounting to £92m for 2025/26 (39.6% of all income) Other specific Government grants total £89.2m (34.4% of all income), which includes funding for CoLP's National Lead Force for Fraud & Cyber roles and a grant to cover CoLP's contribution to the Officer Pension Scheme deficit. Total Government grants amount to £181.2m in 2025/26, 78% of all funding.
- 32. Unlike other Police and Crime Commissioners (PCCs) The City Corporation does not have the ability to raise funding through a Precept on Council Tax. It is however able to levy a Premium on Business Rates to provide local funding for the Police (as well as wider security purposes). The allocation to CoLP is expected to be £29.5m for 2025/26 (12.7%). In 2025/26 the City Corporation will also provide £0.7m of funding towards the contact centre (0.3%) and £1m BRP funding for the Secure City Programme (0.4%).
- 33. Note (xiii) Partnership income totals £13.7m in 2025/26 (5.9% of all income), comprising funding from third parties in support of the fight against fraud and economic crime. In prior year this also included specific funding from TfL in connection with transport policing and safety camera enforcement (24/25 £1.4m) under a Special Services Agreement (SSA). The SSA provides for an establishment of 13.2 FTEs (10 Officers and 3.2 staff). On 30<sup>th</sup> September 2024, however, TfL served the Force with a termination notice effective from 1<sup>st</sup> April 2025 citing significant financial pressures facing TfL and the low level of risk and harm on the road and bus network in the City compared to other areas of London. The challenge for CoLP is that with £2.6m of Uplift maintenance funding dependent on maintaining officers at a headcount levels, it is not possible to reduce officer numbers commensurate with the loss of funding. The 25/26 budget assumes that the officer establishment of 996 will remain affordable through growth in funded activities. The

impact of this on transport policing delivered by CoLP in the City is considered in the non-public section of this agenda.

- 34. **Note (xiv)** Income from fees and charges is estimated to be £5.0m in 2025/26 (2.2% of all income) and is largely derived from training delivered through the Economic Crime Academy, salaries recharged to capital and change projects.
- 35. As set out in the 2023 Income Strategy Report, charging for service is a complex area and as a minimum any charge must recover all direct costs. Wherever possible, however, CoLP will seek to recover full cost using a Full Economic Cost Recovery Model. Applying this model remains critical in 2025/26 to delivering £8.5m of additional income to meet mitigation targets, this is an increase of £4m on 24/25.

#### **Business Unit Control Totals 2025/26**

36. Taking together workforce numbers and the proposed 2025/26 revenue estimate, Table 9 below provides a breakdown of budgeted staffing numbers, business unit control totals for 2025/26 and a summary of the functions included within each unit.

25/26 Budget by Business	TOTAL	Local	Specialist	National	Corporate	Central
Area	COLP	Policing	Operations	Lead Force	Services	Inc & Exp
Budgeted FTE						
Officer	984	390	302	200	92	0.0
Staff	539	75	137	141	186	0.0
Total Establishment	1,523	465	439	341	278	0.0
Officer	55.9	0.0	12.8	27.1	16.0	0.0
Staff	205.6	0.0	7.0	165.8	32.8	0.0
Total Temporary	261.5	0.0	19.8	192.9	48.8	0.0
Total Budgeted FTE	1,784.5	465.0	458.8	533.9	326.8	0.0
Budgeted £m						
Pay Costs	163.4	37.2	36.0	39.3	25.1	25.7
Non Pay Costs	68.9	3.2	2.8	42.0	14.4	6.4
Total Expenditure	232.3	40.4	38.8	81.3	39.6	32.1
Income	(110.1)	(5.7)	(7.6)	(69.4)	(5.8)	(21.5)
Net Budget	122.2	34.7	31.3	12.0	33.7	10.6
Functions Including		Sector Response Taskforce Contact	Intelligence Investigation Forensics CJS	Funded Units FCCRAS/ NFIB NLF Fraud NLF Cyber	Chief Officers CFO COO Prof & Trust	Pension Deficit POCA Recharges Unalloc Roles (NBH)

## Table 9 – Business Unit Control Totals 2025/26

37. As shown in Table 9 above, territorial policing (Local Policing and Specialist Operations) accounts for 52% of the core funded full time equivalent (FTE) staffing numbers and 54% of the net budget. Corporate Services and Central Income and Expenditure consists of 18% of the workforce and 36% of the net budget. The remaining 30% of the workforce are employed in National Lead Force (NLF) the funded nature of its activities means that proportionally it is allocated less core budget as £69.3m of its activities are financed outside of the core Home Office and local BRP funding.

# Core / Funded Analysis 2025/26

38. The scope of funding for the Force's activities, the range of income streams, set out in the non-public Appendix 3 to this report, and organisational structures create a complex network of resource allocation with key funding streams typically spanning more than one business area. Table 10 below, provides a high-level analysis of workforce and budget allocations across five main workstream within CoLP, allocating both people and money to core and funded activities. While this analysis needs to be further matured, it shows the extent to which CoLP's core budget supports 'funded' work including FCCRAS, Funded Units and Change. While CoLP seeks to recover full cost - where appropriate using an Economic Cost Recovery Model- to fully understand the degree of core support/subsidisation an internal recharging methodology would need to be developed to allocate overheads on best value/activity basis across all CoLP's services. Assessment of the resource implications and cost/benefits of progressing this analysis will commence in 25/26.

				Breakdown of Funded Work					
	Core	Funded	Total	NLF Fraud	NLF Cyber	NLF FCCRAS	Funded Units	Other P'ships	Other ART / Projects
				Note	Note		Note		
				1	2		3		
Officers (FTE)	786.8	253.1	1,039.9	97.5	15.0	20.6	75.0	5.0	40.0
Staff (FTE)	359.0	385.6	744.6	102.9	44.5	136.1	32.6	0.0	69.5
Total Workforce									
(FTE)	1,145.8	638.7	1,784.5	200.4	59.5	156.7	107.6	5.0	109.5
Pay Costs (£m)	115.3	46.5	161.7	16.4	6.3	9.8	9.6	0.4	4.0
Non-Pay Costs (£m)	38.6	44.0	82.6	4.7	3.9	30.5	4.8	0.0	0.0
Total Costs (£m)	153.9	90.4	244.3	21.1	10.2	40.3	14.4	0.4	4.1
Income (£m)	(35.6)	(86.6)	(122.2)	(21.1)	(10.2)	(37.3)	(13.9)	(0.4)	(3.7)
Net (£m)	118.3	3.9	122.2	0.0	0.0	3.0	0.5	0.0	0.4

## Table 10 - Core / Funded Analysis

## Notes to Table 10

- The core budget also supports an element of the NLF Fraud team for Fraud Cases in the City (£3.9m / 50FTEs)
- On going core contribution to FCCRAS is £1.5m per annum. Additional £1.5m provision is linked to programme implementation and is time limited.
- Core contribution to funded units is linked to the assessment of work the City would need to do in absence of the units.
- Overheads are included in the cost lines in the table and overhead recovery in the income lines.

## Capital Programme 2025/26

- 39. The CoLP Capital Programme comprises projects developed and managed by the Force, which are either funded directly from the Force's own resources or via a City Corporation loan facility. The revenue budget makes provision for principal and interest repayment. In addition, substantial capital funding is received from the Home Office towards FCCRAS.
- 40. The proposed Capital Programme for 2025/26 is shown in table 10 below and amounts to £13.565m. This comprises an estimated £7.500m on FCCRAS, £2.447m on projects which commenced in prior years, £0.280m for new prioritised projects commencing in 2025/26 and £0.838m remaining uncommitted/available for other new projects in 2025/26. Seven of the projects proposed to commence in 2025/26 are not expected to conclude until 2026/27 with additional spend of £0.238m forecast in that year. All new projects will be subject to business case approvals, supported by assessments on deliverability and affordability.

The 2025/26 capital programme also provides £0.890m for cyclical replacement, £1.000m for Future Police Estates Portfolio (FPEP technological replacement, and £0.610m for contract assessment, continuous improvement and feasibility work. The table also shows a forecast outturn for 2024/25 of £12.297m which is explained in a third quarter (Q3) budget monitoring report on the agenda.

- 41. In addition to the CoLP funded projects, the City of London Corporation funds some strategic CoLP projects, mainly comprising the Accommodation and Secure City Programmes.
- 42. In order to show the full cost of the FCCRAS project, table 11 also shows all years back to 2021/22 when this project commenced. Based on the development of a new programme plan, capital costs are estimated to increase by £6.0m to £37.0m, with the increase expected to be incurred in 2025/26 and funded jointly by Home Office (£4.0m) and CoLP (£2.0m).

# Table 11– Proposed Capital Programme 2025/26

CoLP Capital Programme	21/22 £000	22/23 £000	23/24 £000	24/25 £000	25/26 £000	26/27 £000	Total £000
CoLP PROJECTS:	2000	2000	2000	2000	2000	2000	2000
2025/26 projects and projects start	-	-					
FCCRAS (para 42)	3,970	5,392	12,396	7,780	7,500	-	37,038
Command and Control	-	-	-	93	623	329	1,045
Multi-Agency Police Peer Support	-	-	-	15	133	-	148
(MAPPS)	0.044						
Action Fraud	2,041	-	-	-	-	-	2,041
Data Analytics-Power BI BWV	-	98 181	-	634	50	-	782 224
		175	36	7 22	-	-	
Forensic Case & Quality Mgmt CAID	19	1/5	169 7	22	478	-	844 40
TFG Armoury	19	20	, 141	-	-	-	40 161
ICAV		20	141	- 15	- 50	-	260
Covert Camera System		23	23	65	50	-	111
Covert Surveillance Equipment		23 89	23 64	91	-	-	244
Barbican Airwave Coverage		09	27	31	-	-	244 27
Out of Court Resolution	_	-	- 21	148	-	_	148
Tackling Organised Exploitation	_	-	_	-	7	-	7
E-discovery	_	-	_	50	491	-	, 541
Digital Asset/Evidence Mgmt	-	-	-	4	56	-	60
Joint ERP solution	-	-	-	4	11	20	35
Digital Case File	-	-	-		10	19	29
HO Biometrics Case File	-	-	-	-	5	19	24
Rape Response Review	-	-	-	16	-	-	16
Role Based Access	-	-	-	2	75	21	98
Auto redaction	-	-	-	99	-	-	99
Electronic Display Screen					47		
Equipment Mgmt System	-	-	-	-	47	-	47
Operation Soteria (Vawg)	-	-	-	17	30	-	47
Travel System – Agito	-	-	-	25	-	-	25
Forensic Image Mgmt System	-	-	-	59	3	-	62
Prioritisation, feasibility & other	000	504	40	255			1 005
projects	900	594	46	355	-	-	1,895
Sub-total: 2025/26 projects &	6,930	6,586	13,104	9,548	9,947	422	46,537
projects started in prior years		-		-	-		
Proposed New Projects 2025/26 DDaCs (para 43)					17		17
CCTV (para 44)					23	-	23
Data improvem't prog. (para 45)					23 80	100	180
ESN (para 46)					6	23	29
NLEDS (para 47)					43	12	23 55
Vetting RPA (para 48)					34	-	34
HR recruitment system (para 49)					72	13	85
Virtual reality Engagment(para 50)					-	27	27
Process review (para 51)					5	-	5
Bodyworn live stream (para 52)					-	22	22
Sub-total: Proposed New Projects 2025/26	-	-	-	-	280	197	477
Funding for other new projects				391	838	1,331	2,560
TOTAL CoLP PROJECTS	6,930	6,586	13,104	9,939	11,065	1,950	49,074
	0,000	0,000		0,000	,	.,	

CoLP Capital Programme	21/22 £000	22/23 £000	23/24 £000	24/25 £000	25/26 £000	26/27 £000	Total £000
Continued							
TOTAL CoLP PROJECTS (c/fwd)	6,930	6,586	13,104	9,939	11,065	1,950	49,574
Cyclical replacement							
Fleet (cars) (para 53)	-	340	329	358	459	350	1,836
Fleet (horsebox) (para 54)	-	-	-	400	-	-	400
Fleet (motorbikes)	-	205	-	-	-	-	205
IT (para 55)	-	-	318	1,200	431	400	2,439
Firearms (para 56)	-	-	-	400	-	-	400
Other	1,000	-	225	-	-	-	1,225
Sub-total: Cyclical replacement	1,000	545	872	2,358	890	750	6,415
FPEP tech repayment (para 57)	-	-	-	-	1,000	1,000	2,000
Contract assessment (para 58)	-	-	-	-	100	100	200
Continuous improvem't (para 58)	-	-	-	-	310	1,000	1,310
Feasibility work (para 58)	-	-	-	-	200	200	400
TOTAL STANDING ITEMS	1,000	545	872	2,358	2,500	3,050	10,325
TOTAL CAPITAL EXPENDITURE	7,930	7,131	13,976	12,297	13,565	5,000	59,899
Funding							
City Fund loan (FCCRAS)*	-	-	-	3,017	3,500	-	6,517
City Fund loan (other projects)	2,941	1,401	(137)	595	1,065	-	5,865
Home Office (FCCRAS)*	3,970	3,000	11,200	2,804	4,000	-	24,974
City Fund	-	110	174	-	-	-	284
City ULEZ Ioan	1,000	-	-	-	-	-	1,000
POCA	19	38	7	881	-	-	945
Direct Revenue Financing (DRF)	-	2,582	2,732	5,000	5,000	5,000	20,314
TOTAL FUNDING	7,930	7,131	13,976	12,297	13,565	5,000	59,899

\*The phasing of Home Office and City Contributions between 24/25 & 25/26 may vary from this position.

## Proposed New Projects 2025/26

- 43. Dynamic Decision and Case Management (DDaCs): For policing operations, which have both cross boundary and threat to life characteristics, there is a significant challenge with the inconsistent and incomplete usage of the case management, decision logging and decision support systems. This represents a risk that is being carried by all forces and ultimately, considering the national aspect to complex operations, by the national leads charged with cohering capability. DDaCS is a national programme to introduce one cohesive solution for case management and operational decision-making.
- 44. Closed Circuit Television (CCTV): Following the introduction of the Secure City Programme and upgrades in CCTV capability, this is a project to operationalise those devices, to optimise its outputs and align force structures and resources to make best use of its' availability.
- 45. Data Improvement Programme: A large-scale redevelopment of data usage across the Force, making best use to inform decision making across all levels and seeking to provide a solid evidence-base for performance management.

- 46. Emergency Services Network (ESN): The Home Office is leading a crossgovernment programme to deliver the new Emergency Services Network (ESN) critical communications system. This will replace the current Airwave service used by the emergency services.
- 47. National Law Enforcement Data Programme (NLEDS): National Project to replace the existing Police National Computer.
- 48. Vetting Robotic Process Automation (RPA): Continuous improvement of vetting processes using technological advancement in generative AI and other approaches.
- 49. **HR Recruitment System:** Reviewing the existing recruitment system, and ongoing ERP capabilities to ensure these are fit for purpose of policing requirements, specifically Officer recruitment.
- 50. Virtual Reality Engagement Programme: Continuous improvement using technological advancement in generative AI and other approaches.
- 51. **Process review:** Mapping of all processes to identify areas that duplicate effort; are unnecessary; could be automated or streamlined to release staff time, both for the team managing the tasks and for the end users required to input information for those tasks to be completed
- 52. **BodyWorn Live Streaming:** Continued development of the BodyWorn Video system, allowing real-time streaming into control room or to operational commanders for evidence gathering and improved sight / decision-making.

#### **Standing Items: Cyclical Replacement**

- 53. Fleet (cars): a provision is made for the critical replacement of cars during 2025/26. A new Fleet Strategy is anticipated in 2025 which will provide an evidenced based plan for future fleet purchases.
- 54. **Horsebox:** There was a delay purchasing the horsebox due to the limited supplier selection nationally. However, delivery is expected in 2024/25, and it is anticipated that the full project budget of £400k will be spent.
- 55. **IT replacement:** Current Surface Pros and Laptops are coming to their end of life and require replacing. A provision of £1.2m has been included in the 2024/25 budget to replace up to 1,168 devices and their rollout has commenced, with a further £400k provision included in 2025/26 to replace a further 386 devices which will reach end of life in that year.
- 56. Firearms replacement: A provisional sum of £400k has been provided for the replacement of the current fleet of carbines and their sighting systems due to them approaching their end of useful and economic life. During February testing will be carried on the new equipment will full delivery expect either at the end of March or early April

# **Standing Items: Other**

- 57. Future Police Estates Programme (FPEP) Technology replacement: Future Police Estates Programme (FPEP) tenant-related spend is estimated to total £7.7m, financed from £3m application of the 2024 BRP increase indicatively allocated to fast-track loan repayment, £1.7m residual BRP and £3.0m to be prioritised within cyclical replacement budgets over 3 years. The £7.7m includes 'Category C' furniture, fittings and equipment (FF&E) of £4.4m and end user business as usual IT equipment (£3.3m).
- 58. **Contract assessment, continuous improvement and feasibility work:** Funds have been set aside from 2025/26 for contract assessment, to assess continued business need and ensure timely renewal, and for continuous business improvement and ongoing project feasibility work.

## Capital Programme 2026/27

- 59. Table 11 above also shows an indicative position for the following year 2026/27 based on the annual £5m Direct Revenue Financing (DRF) allowance from the revenue budget to fund projects.
- 60. The table shows £0.238m for the conclusion of the projects proposed to commence in 2025/26, £0.422m on projects which commenced in prior years and the balance of the £5m DRF is shown as funding available for new projects in 2026/27 (£1.190m).
- 61. The 2026/27 capital programme also provides £0.750m for cyclical replacement, £1.100m for FPEP technology replacement, £1.000m continuous improvement and £0.300m for contract assessment and feasibility work.

### Reserves

62. The forecast Force reserves position for 2025/26 is summarised in Table 12 below.

CoLP Reserves	Opening Balance 01-Apr- 24 £'000	Q3 Forecast Additions 2024/25 £'000	Forecast Spend 2024/25 £'000	Forecast Closing Balance 31-Mar- 25 £'000	Forecast Additions 2025/26 £'000	Forecast Spend 2025/26 £'000	Forecast Closing Balance 31-Mar- 26 £'000
General reserve	6,595	-	-	6,595	-	-	6,595
Earmarked reserves:							
POCA	5,946	500	(2,600)	3,846	500	(2,212)	2,134
Emerg Services Mobile Tech	294	-	-	294	-	-	294
Action Fraud Reserve	775	-	(775)	-	-	-	-
Asset Replacement	-	-	-	-	750	-	750
Corporate Priorities	-	-	-	-	250	-	250
Sub-total - Earmarked reserves	7,015	500	(3,375)	4,140	1,000	(2,212)	3,428
TOTAL RESERVES	13,610	500	(3,375)	10,735	1,500	(2,212)	10,023

- 63. Over the medium term CoLP's reserve strategy aims to maintain a general reserve that supports management of CoLP's strategic and medium-term financial risks to: 1) cope with unforeseen events and emergencies, 2) as a contingency to respond to uncertainty in the economic climate, 3) to provide flexibility in managing future years budget pressures and 4) to balance cashflow fluctuations without calling upon additional local grant and/or loan funding. The proposed 2025/26 budget does not anticipate use of the general reserve, however, this is subject to inflation and other pressures not increasing above current budgetary assumptions. The Force's reserves policy, in line with Home Office expectations, is to maintain a General Reserve of 5% of net revenue expenditure (NRE). In 2025/26 the balance held in the Force's General Reserve is 5.31% of NRE.
- 64. POCA relates to the National Asset Recovery Incentivisation Scheme (ARIS), where relevant agencies get back a proportion of what they recover. It is expected that the funds are used to improve performance on asset recovery and to fund local crime fighting priorities for the benefit of the community in the following categories:
  - Asset Recovery Work
  - Crime Reduction projects
  - Community Projects
  - Miscellaneous

- 65. The opening balance at the start of 24/25 was £5.9m and includes an unusually large receipt of £7.1m which was received at the end of 2021/22 from Operation Neutron. Given the significance of the reserve and requirement for sound governance it was determined that through the budget setting process the Police Authority will approve planned level of commitment and annual spend against POCA funds.
- 66. The use of POCA is subject to full business case development, project prioritisation and assessment of affordability. Updates on expenditure have been reported quarterly to this Committee and this stage the POCA reserve is forecast to fund £2.2m of revenue and capital expenditure in 2025/26 comprising £2.1m in relation to asset recovery / civil recovery activities and £0.1m for other relevant expenditure as set out below.

POCA Bids	Asset Recovery £'000	Crime Reduction £'000	Community Projects £'000	Misc £'000	Total £'000
Asset Recovery Team (Revenue)	1,459	-	-	-	1,459
Civil Recovery Team (Revenue)	617	-	-	-	617
Covert Tasking	-	10	-	-	10
ECPHQ Communications Support	-	100	-	-	100
Sub-total Revenue Funding	2,076	110	-	-	2,186
Data Analytics	-	-	-	11	11
Out of Court Resolutions	-	-	-	15	15
Sub-total Capital Funding	-	-	-	26	26
Grand Total	2,076	110	-	26	2,212

- 1 Support Services and Capital Charges
- 2. Supplies and Services and Third-Party Expenditure Analysis

3. Income & Funding Streams – Non-Public

4. MTFP Pressures, Mitigations and Funding Streams – Non-Public

#### Alistair Cook

Chief Finance Officer E: alistair.cook@cityoflondon.police.uk

#### **Support Services and Capital Charges**

Support Services & Capital Charges from/to the City of London Police	Original Budget 2024/25 £'000	Draft Budget 2025/26 £'000	Note Ref
Support Services and Capital Charges City Surveyor's Employee Recharge Insurance IT Recharges – Chamberlain Capital Charges Capital Contras Notional capital charges Admin Buildings	91 454 6 2,541 (2,541) 65 1,276	88 391 2 2,594 (2,594) 65 1,487	(i)
Support Services Total	1,538 <b>3,430</b>	1,436 <b>3,469</b>	(ii)
<b>Recharges Within Fund</b> Car Park Recharge P&T Licence fees – Port Health & Environmental Services Committee	49 18	42 18	
Total	67	60	
<b>Recharges Across Funds</b> Remembrancer's Recharge - Policy & Resources - City's Cash	28	28	
Total	28	28	
TOTAL POLICE	3,525	3,557	

Notes:

- (i) Share of Guildhall premises costs based on floor area. Variations reflect the phasing of the cyclical works programme Support Services covers charges from the Chamberlains, Comptroller and
- (ii) City Solicitor, Town Clerk and City Surveyor's departments

## Appendix 2

## Supplies and Services analysis

Category	24/25 Latest Budget	224/25 Actuals	24/25 Projected Outturn	24/25 Variance vs.	25/26 Projected Budget	25/26 vs 24/25 Budget
	£'000	Q3 £'000	Q3 £'000	Budget £'000	£'000	£'000
Action Fraud/FCCRAS	16,371.0	23,580.0	31,677.0	15,306.0	29,911.0	11,540
Advertising	24.0	19.1	23.7	(0.3)	25.0	1.0
Animals & Livestock	153.0	87.0	142.0	(11.0)	156.0	3.0
Books	7.0	(0.2)	0.0	(7.0)	0.0	(7.0)
Computer	3,930.0	3,295.6	4,516.0	586.0	5,442.0	1,512.0
Conferences	59.0	322.5	338.7	279.7	95.0	36.0
Contract expenses	78.0	78.1	26.7	(51.3)	78.0	0.0
Contributions to Funds & Provisions	205.0	8.9	155.0	(50.0)	210.0	5.0
Equipment	2,620.0	1,221.4	2,105.5	(514.5)	2,580.0	(40.0)
Fees	8,732.0	5,271.6	8,933.1	201.1	7,184.0	(1,548.0)
Furniture	2.0	24.4	24.3	22.3	2.0	0.0
General Office Expenses	0.0	0.9	1.2	1.2	1.0	1.0
Grants & Subscriptions	951.0	810.4	1,636.2	685.2	964.0	13.0
Hospitality	8.0	48.3	45.4	37.4	159.0	151.0
Laundry & Dry Cleaning	8.0	(3.3)	0.0	(8.0)	0.0	(8.0)
Materials	35.0	13.9	12.8	(22.2)	6.0	(29.0)
Mayoralty And Civic Expenses	0.0	5.4	7.2	7.2	0.0	0.0
Other Charges	0.0	(4.0)	(4.0)	(4.0)	0.0	0.0
Postage	59.0	13.7	10.6	(48.4)	55.0	(4.0)
Printing	76.0	38.1	65.6	(10.4)	69.0	(7.0)
Provisions	21.0	33.8	21.5	0.5	11.0	(10.0)
Purchase of Vehicles	12.0	28.7	35.3	23.3	0.0	(12.0)
Radio	1.0	(0.4)	0.0	(1.0)	1.0	0.0
Services	458.0	428.2	29.9	(428.1)	617.0	159.0
Stationery	17.0	16.9	10.3	(6.7)	16.0	(1.0)
Subsistence	344.0	251.2	344.8	0.8	425.0	81.0
Telephone	270.0	374.8	129.8	(140.2)	240.0	(30.0)
Uniforms	648.0	606.1	537.6	(110.4)	686.0	38.0
	35,089.0	36,571.0	50,826.0	15,737.0	46,933.0	11,844.0

## Appendix 2

## Third Party Payments analysis

Third Party Categories	24/25 Latest Budget £'000	24/25 Actuals Q3 £'000	24/25 Projected Outturn Q3 £'000	24/25 Variance vs.Budget £'000	25/26 Projected Budget £'000	25/26 vs 24/25 Budget
Rail Delivery Group - Officer Travel	0	0	0	0	2,074	<b>£'000</b> 2,074
	-		•			,
Accommodation	146	239	166	20	191	45
Forensic Services	295	328	310	15	280	(15)
IT SLA	6,200	4,026	6,200	0	6,200	0
Occupational Health	297	133	297	0	297	0
NPCC/Other Subscriptions	140	139	144	4	155	15
National Lead Force	2,393	1,136	2,290	(103)	1,237	(1,156)
Seconded Officers	146	62	75	(71)	146	0
Miscellaneous	5	1,529	20	15	61	56
	9,622	7,593	9,502	(120)	10,641	1,019

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# Agenda Item 10

<b>Committee(s):</b> Strategic Planning & Performance Committee – For discussion Police Authority Board – For decision	Dated: 11 February 2025 12 February 2025
Subject: Draft Policing Plan 2025-28	Public report: For Decision
<ul> <li>This proposal:</li> <li>delivers Corporate Plan 2024-29 outcomes</li> <li>provides statutory duties</li> <li>provides business enabling functions</li> </ul>	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?	No
If so, how much?	£-
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
Report author:	Kate Lloyd, Strategy Director

#### Summary

The draft City of London Police Policing Plan 2025-28 (found at Appendix 2) outlines a strategic framework to ensure safety and security within the City of London, aligned with the City of London Corporation's broader vision and priorities set out in the City Corporation's Corporate Plan. The Policing Plan has been developed through extensive collaboration, public engagement and an evidence-based approach. Members are requested to review and provide feedback on the draft, which will undergo further refinement before its publication on 1 April 2025.

#### Recommendation(s)

Members of Strategic Planning & Performance Committee and Police Authority Board are asked to:

- Note the report.
- Review and provide comments on the draft Policing Plan 2025-28 found at Appendix 2.

Members of the Police Authority Board are asked to:

• Delegate authority to the Town Clerk, in consultation with the Chair, Deputy Chair and wider membership of the City of London Police Authority Board, to

sign off the final version of the Policing Plan 2025-28 content, ahead of presenting the final version to the Court of Common Council on 22 May 2025. (NB: The publication of the final version of the Policing Plan 2025-28 will still take place on 1 April 2025.)

#### Main Report

#### Background

- Members will recall the principles of the development of the Policing Plan 2025-28 including increased engagement & co-production with the public and our own people, using an evidence-based and data-driven approach and working closely together with the City of London Police Authority Team to draft the plan.
- 2. The draft Plan at Appendix 2 is ready for review and comment by Members. We are still considering the wording of the current mission and performance measures, to support progress monitoring, and are also working through more detailed feedback from the Police Authority team. These will be considered alongside Member feedback as part of the next iteration of the Plan.
- 3. The Police Authority team have procured a designer (Design 102) for the new Plan the same company used to design the City of London Corporation's Corporate Plan. Visuals for the 'look and feel' of the new Plan will be provided to Members at the SPPC meeting.
- 4. In drafting this plan, the City of London Police and Police Authority Team have held an informal session with the Deputy Commissioner and the Chair of Police Authority Board with Chairs of the Police Authority Board's Sub Committees to discuss the crime profile in the City and how this has informed the Policing Plan (20 January 2025). In addition, the Commissioner held a Member briefing session with the whole Court of Common Council on 28 January 2025.

#### **Current Position**

- 5. The next steps involve:
  - a. Consideration of the Plan by the Strategic Planning & Performance Committee
  - Approval of the Plan by the Police Authority Board with delegated authority requested to develop final version (12<sup>th</sup> February)
  - c. Plan to "go live" from 1 April 2025
  - d. Plan presented to the Court of Common Council by the Chair of PAB on 22 May 2025
- 6. A delivery timeline is at Appendix 1.

#### **Corporate & Strategic Implications**

Strategic implications

- 7. The City of London Corporation's Corporate Plan sets out a vision for a vibrant and thriving City, supporting a diverse and sustainable London within a globally successful UK. As well as applying the principles underpinning the Corporation's Plan, our Policing Plan supports actions one to three of the 'Diverse Engaged Communities' Outcome, actions four and five of the 'Dynamic Economic Growth' Outcome and action two of the 'Vibrant Thriving Destination' Outcome.
- 8. The Safer City Partnership (SCP) operates as the City of London's statutory Community Safety Partnership (CSP). The partnership appoints the SCP Strategic Board which consists of statutory and voluntary organisations who work together to reduce crime and anti-social behaviour. The partnership is responsible for the delivery of a wide variety of strategies and plans with the aim of improving the safety of the community in the City of London. As part of this process a Community Safety Strategy is published every three years which focuses on an identified set of priorities. We will endeavour to ensure that the priorities in the policing plan complement those in the SCP Strategy.

#### Financial implications

9. In developing this plan, consideration has been given to the City of London Police's business planning process and medium term financial plan to ensure that any new commitments do not create additional financial burdens or cost pressures on City of London Police, or can be re-prioritised accordingly as part of the business planning process.

#### **Resource implications**

10. This plan has been developed in line with the business planning process to ensure any resource implications can be absorbed within the existing resource allocation.

#### Legal implications

- 11. 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 ("policing 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.
- 12. The Plan must also have regard to the national <u>Strategic Policing</u> <u>Requirement</u> (SPR) which sets out the Home Secretary's view of what the current national threats to public safety are, and the national policing capabilities needed to counter those threats. Several of these threats –

namely violence against women and girls, terrorism, fraud and cybercrime are reflected in our local Policing Plan where they match our local objectives (based on consultation and our demand profile). However, City of London Police continues to maintain the capability to fulfil its national responsibilities in response to *all* the threats outlined in the SPR, including tackling serious organised crime, child sexual abuse, public disorder, civil emergencies and cross cutting capabilities.

#### **Risk implications**

13. Any risk implications will be picked up through the business planning process and risk management arrangements.

#### Equalities implications

14. The current draft of the Policing Plan has paid due regard to the Equality Act. It prioritises equity, diversity and inclusion including City of London Police's commitment to be one of the most inclusive and trusted police services in the UK, in line with CoLP's current Equity, Diversity and Inclusion Strategy. The accessibility of the document has been an important consideration when drafting the Plan and procuring designers for this product.

#### **Climate implications**

15.None.

#### Security implications

16. The Policing Plan 2025-28 sets out strategic objectives of how the City of London Police will maintain security within the Square Mile.

#### Conclusion

17. The draft Policing Plan 2025-28, informed by extensive consultation and a range of local and national strategies, plans, and priorities – including the Corporation's Corporate Plan and the Strategic Policing Requirement - represents fulfilment of the Court's legal duty and our shared commitment to improving the safety, security and confidence of communities, both locally and nationally. Members are invited to review and provide feedback so the Plan can be refined further ahead of its publication on 1 April 2025.

#### Appendices

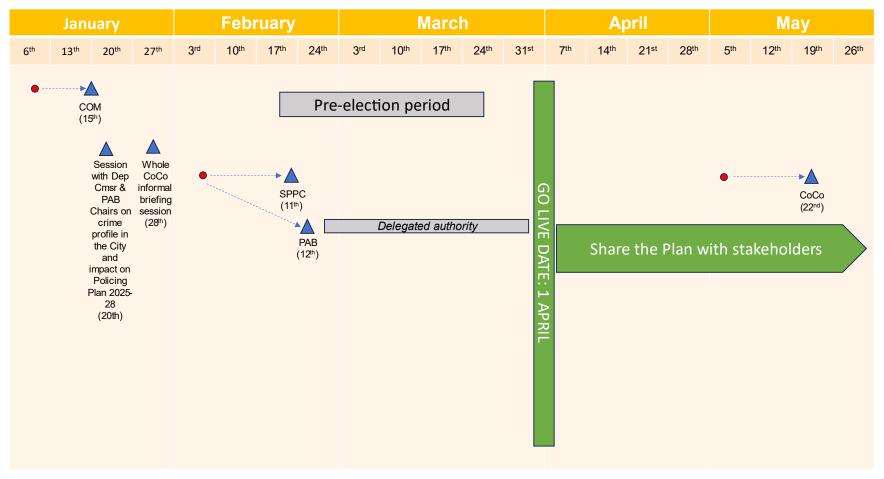
- Appendix 1 Policing Plan Delivery Timeline
- Appendix 2 Draft Policing Plan 2025-28 (attached separately)

#### Kate Lloyd

Strategy Director, City of London Police E: <u>kate.lloyd@cityoflondon.police.uk</u>

#### Appendix 1 – Policing Plan 2023 – 2025 Delivery Timeline

# 2025 Timeline



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# City of London Policing Plan 2025-28

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	Working with others
	Accountability and scrutiny
Appendices	A: Performance Framework

## Foreword

Chair's Foreword [photo] [PAB Team to add]

## Commissioner's foreword

## [photo]

I am delighted to present our City of London Policing Plan for 2025 to 2028. This Plan sets out our priorities for keeping the iconic City of London safe alongside our national roles tackling fraud, economic and cyber crime, and our commitment to supporting victims. It will guide our work over the next three years.

Achieving the commitments set out in this Plan will contribute to ensuring that the Square Mile remains one of the safest business districts in the world and that the UK continues to improve the policing response to fraud, economic and cyber crime – with fraud representing the most commonly experienced crime in the UK. In doing so the Plan will contribute to promoting the economic security and prosperity that will ensure the UK can meet its full potential. The Plan also reflects our ambition for the City of London Police to become one of the most trusted and inclusive police services in the country. The Plan also reflects our ambition for the City of London Police to become one of the most trusted and inclusive police services in the country.

As well as setting out *what* City of London Police will focus on to keep people safe over the next three years, this Plan sets out *how* we will achieve our objectives. Our values of professionalism, integrity and compassion will continue to drive our approach and behaviours, as will our commitment to working with our partners and communities to take an increasingly preventative approach to tackling crime and disorder.

This Plan – owned by the Court of Common Council - has been developed in partnership with the City of London Police Authority. The priorities within it reflect the changing demand picture within the City, our national policing responsibilities, and extensive consultation with our partners, residents, and those who work in and visit the City. I am extremely grateful to everyone who has taken the time to contribute to this process.

I am immensely proud to have the privilege of leading the City of London Police and I look forward to working with our partners and communities to keep our streets safe - both in the City and online - across the life of this Plan and beyond.

Pete O'Doherty Commissioner of the City of London Police

## **Policing plan summary**



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

#### What we do [external]

Operational priorities	Keep people in the City safe and feeling safe	Support victims in everything we do	Improve the policing response to economic and cyber crime
Objectives	<ul> <li>Reduce theft</li> <li>Reduce violence</li> <li>Protect the City from terrorism</li> </ul>	<ul> <li>Implement our Victims Strategy for the City</li> <li>Implement victim-focussed commitments from our fraud, economic and cyber crime strategy</li> <li>Bring perpetrators of crime in the square mile to justice</li> </ul>	<ul> <li>Protect people and businesses from economic and cyber crime</li> <li>Transform the national response to economic and cyber crime</li> <li>Proactively pursue offenders</li> </ul>

#### What we do [internal]

Organisational priorities	Be one of the most inclusive and trusted police services in the country	Be an employer of choice	Maximise our productivity
Objectives	<ul> <li>Implement our Equity</li></ul>	<ul> <li>Attract, recruit and retain</li></ul>	<ul> <li>Use data effectively to</li></ul>
	Diversity and Inclusion	the best talent <li>Equip our people with the</li>	inform our decision making <li>Make the best use of our</li>
	Strategy <li>Enhance our approach to</li>	tools and skills they need	limited resources <li>Make processes simpler,</li>
	engaging with communities <li>Maintain high ethical and</li>	to succeed <li>Support the health and</li>	more effective and more
	professional standards	wellbeing of our people	efficient

#### How we do it [external and internal]

Values	Professionalism	Integrity	Compassion
--------	-----------------	-----------	------------

	We will deliver our services	We will earn the trust of diverse	We will act with humanity and
	professionally and diligently. We	communities and partners	kindness, ensuring our people
L	will always expect the highest	through honesty and always	and communities are treated
tioı	level of professional conduct by	doing the right thing. We will be	with care and respect. We will
Description	our people and commit to their	open to scrutiny and	create a culture of belonging
SC	continuous professional	transparent in our actions. We	and mutual trust and respect.
De	development.	will respond to criticism with a	
		willingness to learn and	
		change.	

# Part 1: Background to our Plan



## Policing in the City of London

The City of London Police has policed the City of London for over 180 years and it remains a unique environment in which to police. Our approach to delivering the objectives set out in this Plan is shaped by these unique circumstances, and by the wider national and global context within which policing is operating, including the changing nature of police demand.

The City of London is about one square mile in size, with around 8,700 residents, over 600,000 workers in a typical day, and over 21 million visitors a year. The City is both the historic and geographic heart of the capital, bordered by seven central London boroughs. It is an important visitor destination considering it is home to countless sites of historic, cultural and economic interest, including St Paul's Cathedral, the Guildhall, the Barbican, the Bank of England and the Stock Exchange. The City's retail and leisure facilities include almost a thousand licensed premises. The City is also one of the most important financial centres in the world and the economic heart of the United Kingdom – with more than 6,000 businesses and generating over £85 billion in economic output annually.

We expect these numbers to continue to grow as the City of London Corporation delivers on the exciting developments set out in its *Destination City Programme* - the Corporation's growth strategy for the Square Mile as a world-leading business and leisure location – which is likely to result in a corresponding increase in the scale and complexity of crime demands in the City.

Nationally, demands on policing are also changing. The 2024 Crime Survey of England and Wales found that whilst traditional volume crime (including burglary and vehicle theft) has generally decreased over the last 10 years (with some notable exceptions such as sexual assault) there have been notable increases in robbery and violence with injury. The cost-of-living continues to have an impact on crime and non-crime demand by affecting both offending behaviours and the nature of victimisation and vulnerability, both of which affect the scale and complexity of demands on policing.

The threat from – and profile – of terrorism is increasingly complex, including an increasing range of beliefs and ideologies alongside conspiracy theories and disinformation. Self-initiated terrorists are becoming more prevalent and challenging to identify and stop. Whilst we have not seen a recent attack, the national terrorism threat remains at Substantial (meaning an attack is likely). The City of London's historical, cultural, and economic importance means it will always be an attractive target for those intent on causing high-profile disruption.

The increasing globalisation of goods, people, and services, the evolution of technology, and changes in social norms, continue to drive the significant threat from cyber and economic crime (including fraud), which affect more people, more often, than any other crime type and cause significant harm to victims. Cyber and economic crime – including fraud - amounted to over half of all recorded crime

across England and Wales last year and we continue to see increases in national fraud and cyber reporting. Other areas of economic crime, such as corruption and bribery, are also receiving higher levels of public scrutiny.

The wider global context is also relevant to policing, from the need to improve the sustainability of our estate's infrastructure to managing the additional demand from climate activists exercising and protest activity resulting from geopolitical instability and climate change.

The national decline in public trust and confidence in the police and wider criminal justice system continues to have implications for police effectiveness and legitimacy, and in the tight fiscal climate it is also imperative that policing continues to improve its productivity so we can continue to deliver more with less. The public rightly have high expectations of the service they receive from the police, and this includes using data and technology to respond to crime and engage more effectively with our communities.

Our policing model focusses on responding swiftly to calls for service, undertaking high quality investigations, working collaboratively with our partners and communities to prevent the local crime and anti-social behaviour and supporting victims in everything we do. As well as being a local police service, City of London Police leads the national policing response to cybercrime and economic crime (including fraud). Our National Policing Strategy for Fraud, Economic and Cyber Crime 2023 - 2028 sets out our plans for responding to this increasingly complex and globalised threat, including working with national and international law enforcement agencies.

## About this Plan

This Plan has been prepared in line with legislation (The Police Act 1996) which requires the Court of Common Council – the City's governing body – to set policing objectives for the City of London Police each financial year. It details our six operational and organisational priorities for the next three years, and how they will be delivered – including through our values - and will be refreshed annually. Our operational priorities focus on the service we provide to the public and our organisational priorities will help us to deliver our operational priorities. The Plan has been informed by extensive consultation, relevant local and national strategies and the national Strategic Policing Requirement (SPR). Several of the threats set out in the SPR are reflected in the objectives of this Plan, and we maintain the capability to fulfil its national responsibilities in response to all the threats outlined, including tackling serious organised crime, child sexual abuse, public disorder, civil emergencies and cross cutting capabilities. More detail on the evidence base behind the plan is available here: [add link].

## Part 2: Our Plan

## Mission

City of London Police is a *local service with a national role, trusted by our communities to deliver policing with professionalism, integrity and compassion*.

## **Operational priorities**

## Priority 1: Keep people in the City safe and feeling safe

We want the City of London to be one of the safest business districts and places to live in the world. The City of London Police provides a 24/7, 365 days a year service to keep those who live, work, study in and visit the City safe and we will continue to work with our partners to maintain our safe streets and public spaces that residents, workers and visitors can enjoy and feel safe in during the day and at night. We will work to prevent, respond to and investigate all forms of crime on our City, from those with highest volume, such as theft, to those that cause the greatest harm, such as terrorism and violence against women and girls. Our neighbourhood officers work with local community safety partners – through the Safer City Partnership - to achieve as part of a problem-solving approach in response to the needs of our communities. The objectives below reflect our focus on addressing the types of crime that our communities told us were the highest priorities for them.

## **Objective a) Reduce theft**

Theft makes up more than half of the crime experienced within the City of London. Most thefts are linked to our high daily footfall and night time economy, but this also reflects a wider national trend. We continue to work closely with our communities, both business and residential, and our partners in the Safer City Partnership, to reduce theft, including those associated with retail and licenced premises. To achieve this objective City of London Police will:

- Work with our partners to provide crime prevention advice to residents and workers across the City through a range of Operations and campaigns.
- Work with our Business Crime Reduction Partnership and Business Improvement Districts to deter offending through situational crime prevention advice to retailers.
- **Deploy our proactive crime teams** to undertake patrols and use data led tasking and technology such as CCTV to prevent, disrupt and reduce the most prevalent types of theft in the City.

### **Objective b) Reduce violence**

The City of London Police continues to improve the prevention, detection and investigation of violence in all its forms and levels of violence in the City remain low. However, violence linked to our night time economy – including Violence Against Women and Girls - remains an important priority both locally and nationally due to the level of harm it causes. Violence Against Women and Girls is designated as a national threat by the Home Secretary and it was a priority emerging from our public consultation. To achieve this objective City of London Police will:

- **Refresh our Violence Against Women & Girls Strategic Delivery Plan** which sets out our approach to effectively identifying, responding to and preventing violence against women and girls.
- **Continue to deliver Operation Reframe**; a successful partnership initiative with local partners and businesses including licensed premises and taxi marshals to create safe spaces for women in our night time economy.
- Pilot and evaluate the success of the Servator violence against women and girls approach which trains frontline officers and control room staff to spot and address predatory behaviours linked to potential violence against women and girls.
- Enhance our approach to hotspot patrolling by using data analytics, technology, enhanced training and robust tasking to target violence hotspots and reduce violence linked to the night time economy.

## **Objective c) Protect the City from terrorism**

Protecting the City from terrorism remains a high priority for the public and for the police service more widely, so it remains a high priority for City of London Police. The City of London's historical, cultural, and economic importance means it will always be an attractive target for those intent on causing high-profile disruption, and the City of London Police, alongside our local and national partners, undertake critical work to prevent attacks and ensure we can respond effectively, should an attack occur. The commitments set out in this Plan support the four pillars of the national counterterrorism strategy (CONTEST) which aim to prevent people turning to terrorism, pursue those who plot to carry out attacks, strengthening our protection against a terrorist attack and prepare to mitigate the impact of any attack. To achieve this objective City of London Police will:

• **Implement protective security tactics** to protect the City from terrorist attack including working with venues to enhance security awareness and improve venue security.

- **Disrupt terrorist activity** by leading the counter-terrorism policing tactic -Project Servator - across law enforcement and businesses locally, nationally and internationally.
- **Collaborate with the Metropolitan Police Service** to maintain high quality counter terrorism capability across London, including joint training and exercising and maintaining the London-wide firearms commitment.
- **Continually improve our approach** by implementing learning from inquiries and reviews and testing and exercising with partners to enhance our preparedness for an attack.

## Priority 2: Support victims in everything we do

The City of London Police will continue to put victims at the heart of everything we do. In February 2025 we published our first comprehensive Victims Strategy [link], setting out how we will improve services and outcomes for victims in the Square Mile. The Strategy also summarises how, through the 2023 National Policing Strategy for Fraud, Economic, and Cyber Crime, the City of London Police is improving services and outcomes for victims of these offences at every stage from initial reporting to investigation to ongoing victim support. We know that one of the most important things for victims is how their case is investigated and whether a positive case outcome is secured. While we already achieve the highest overall positive outcome rate in the country, including for domestic abuse and rape, it is critical that we maintain, and where possible improve, this to ensure that more victims can get the justice they deserve. As such, this Policing Plan commits to additional measures on bringing perpetrators of crime in the Square Mile to justice.

## Objective a) Implement our Victims Strategy for the City

Our Victims Strategy sets out how we will improve services and outcomes for victims in the Square Mile through better information and communication, ensuring procedural justice, improved multi-agency working and professionalisation of victims services. The Strategy also includes new commitments on how the City of London Police Authority and City of London Corporation will improve the representation and promotion of victims' interests in the Corporation's internal local government work and external engagements with City businesses and employers. To achieve this objective City of London Police will:

- Implement measures to improve information for and communication with - victims in line with Priority area 1 of our Strategy
- Implement measures to ensure procedural justice for victims in line with Priority area 2 of our Strategy

- Implement measures to improve multi-agency working in line with the measures set out in Priority area 3 of our Strategy
- Implement measures to professionalise victim services in line with the measures set out in Priority area 4 of our Strategy.

# Objective b) Implement victim-focussed commitments from our Fraud, Economic and Cyber-crime strategy

City of London Police published the five-year National Policing Strategy for Fraud, Economic and Cyber-crime in 2023, with improving outcomes for victims as one of its three strategic objectives. To achieve this objective City of London Police will:

- Launch the new Fraud and Cyber-Crime Reporting and Analysis Service [new name if announced] to make reporting crimes easier and faster for users, improve the information they subsequently receive, provide targeted advice, significantly improve the speed and quality of information given to law enforcement partners to boost the changes of successful prosecutions and provide real-time information to institutions and organisations to help block and disrupt crime.
- Increase investment in the National Economic Crime Victim Care Unit, which now covers all 43 police forces in England and Wales, and provides nationwide access to specialist advocates to help victims of fraud and cybercrime, providing both emotional support and practical advice to reduce the possibility of repeat victimisation.
- Increase engagement with England and Wales's 43 police forces on fraud and cyber-crime, with a focus on the resources and capabilities they need to effectively deal with these offences in their areas, as set out in the most recent Strategic Policing Requirement and City Police's own National Lead Force Improvement Plan.

#### **Objective c) Bring perpetrators of crime in the Square Mile to justice**

The City of London Police is proud of having the highest rate of positive outcomes (by which we mean the range of resolutions or disposals available to deal with offenders and secure effective justice consequences on behalf of victims) nationally, but we are not complacent. We want to continue to improve our positive outcome rates for victims of crime in the City, by bringing more perpetrators of crime to justice. To achieve this objective City of London Police will:

- Continue to seek charges, prosecution, or out of court disposals against perpetrators of crime to improve positive outcomes for victims and reduce reoffending.
- **Implement improvements to the supervision of police officers** throughout investigative processes to improve criminal investigations and deliver higher-quality casefiles.
- Embed the work of the Volume Crime Unit to improve the pace and quality of volume crime investigations such as theft and shoplifting.
- **Implement the Operation Soteria model** to improve investigation of rape and serious sexual assaults in line with national best practice.

# Priority 3: Improve the policing response to economic and cyber crime

Today, many people are spending an increasing proportion of their lives online, from banking and doing business, to gaming and communicating through social media. As a result, online crime, including fraud and other types of cyber crime now represents a significant proportion of all crime and victimisation, with fraud as the most common crime in the UK. The scale and complexity of many of these types of crime represent significant challenges for policing and its partners. City of London Police remains at the forefront of leading the national policing response to these threats, including developing the capacity and capability of the workforce to protect people and businesses and using data and innovative technologies to continually improve our ability to identify, pursue, investigate and bringing offenders to justice. We will continue to work closely with government, public and private sector partners to support system reforms that will reduce fraud and its impacts to enhance the economic security and prosperity of the UK. The objectives set out below reflect those set out in City of London Police's *National Policing Strategy for Fraud, Economic, and Cyber-crime 2023-2028*.

#### Objective a) Protect people and businesses from economic and cyber crime

City of London Police will continue to work with local and national partners to provide UK citizens and businesses with the knowledge and tools they need to protect themselves from economic and cyber crime. To achieve this objective City of London Police will:

• **co-ordinate consistent messaging and campaigns** to empower people and businesses to reduce the likelihood of them being successfully targeted by criminals online and pointing them to other services where needed.

- work with forces and regional units to promote and use the Police CyberAlarm system to support member organisations when cyber issues are identified.
- Deliver the new Cyber Resilience Centre model to strengthen cyber resilience across the nation's small and medium-sized enterprise (SME) community and work with the National Business Crime Centre to protect business interests and strength economic growth.
- work with industry and financial institutions to prevent online offending including provision of real-time information to help stop offenders from being able to target people and businesses.
- work with Ofcom and industry to ensure successful implementation of and compliance with the measures set out in the Online Safety Bill.

#### Objective b) Transform the national response to economic and cyber crime

City of London Police will continue to lead the national response to fraud, economic and cyber crime, including working with local, national and international law enforcement and industry partners to build capability and promote innovation. To achieve this objective City of London Police will:

- Equip teams with the specialist knowledge and skills required to tackle complex investigations and criminal networks, locally, regionally and nationally, through the work of the Economic and Cyber Crime Academy.
- Work with businesses to promote innovation including through use of technology, automation and intelligence sharing - to predict and prevent opportunistic criminality.
- **Pilot a new Domestic Corruption Unit** to proactively investigate cases of corruption and provide valuable insights into the corruption threat landscape.

#### **Objective c) Proactively pursue offenders**

City of London Police will support police forces and national and international agencies to proactively pursue offenders and serious organised criminal networks and develop the intelligence to secure prosecutions. To achieve this objective City of London Police will:

• Improve the speed and quality of information provided to law enforcement agencies - by exploiting new technology and data analytics

capability - so they can pursue offenders and organised criminals and bring them to justice.

- **co-ordinate regional Proactive Economic Crime Teams** to target and pursue high harm offenders through proactive and intelligence led investigations and investigate the complex fraud cases.
- increase criminal justice outcomes against money laundering offenders, including seizing more criminal assets.
- Deliver the new national domestic corruption unit pilot which will play a central role in delivering the enforcement elements of the government's anticorruption strategy

## **Organisational priorities**

# Priority 4. Be one of the most inclusive and trusted police services in the country

In the City of London Police's Equity, Diversity and Inclusion (EDI) Strategy 2024-27, published in 2024, we announced our ambition to become one of the most inclusive and trusted police services in the country. We know that widely-publicised failings have damaged the public's confidence in police services. Equity, diversity and inclusion are essential to rebuilding that confidence, to embedding our values of professionalism, compassion and integrity, and to our duty to keep everyone safe. The objectives and commitments below reflect and reinforce the priorities set out in our EDI Strategy, as well as measures to enhance our neighbourhood approach to engaging with communities and to maintain the highest ethical and professional standards.

#### **Objective a) Implement our Equity, Diversity and Inclusion Strategy**

Our EDI strategy sets out that we will achieve our ambition to become one of the most inclusive and trusted police services in the country by prioritising our people, strengthening our policies and processes, collaborating with our public and working with our partners. To achieve this objective City of London Police will:

• Increase the diversity of our workforce and create an equitable working culture by implementing the *People* strand of our EDI Strategy.

- Make our policies and processes equitable, accessible and inclusive by implementing the *Policies and Processes* strand of our EDI Strategy.
- **Improve public confidence in our policing** by implementing the *Public* strand of our EDI strategy
- **Provide enhanced services for our communities** of by implementing the *Partners* strand of our EDI Strategy

### Objective b) Enhance our approach to engaging with our communities

City of London Police continues to provide a highly visible, approachable and respectful neighbourhood policing presence that engages with – and is responsive to - the needs and concerns of our communities. We will continue to enhance this offer, in line with the government's Safer Streets mission, to increase public trust and confidence. To achieve this objective City of London Police will:

- **Deliver a range of structured engagement opportunities** to understand and respond to the concerns of our communities – both locally and nationally including workers, businesses and under-represented groups.
- **Maintain a named police officer in each City ward** who is contactable and accessible to local communities and responsible for engaging with and responding to the concerns of local communities, in line with the government's Neighbourhood Policing Guarantee.
- **Professionalise neighbourhood policing** by drawing on good practice and working with the College of Policing to roll out Neighbourhood Policing training to our neighbourhood officers and staff.
- **Make fair decisions and treat people respectfully** including inviting external scrutiny of our use of force and stop and search powers through our Independent Advisory and Scrutiny Group to help us identify, understand and address any disproportionate use.

#### **Objective c) Maintain high ethical and professional standards**

Public trust and confidence in policing is vital to secure police effectiveness, efficiency and legitimacy and it has been damaged nationally by widely publicised challenges and failings. City of London Police will engender public trust and confidence by continuing to maintain the highest ethical and professional standards in everything we do. To achieve this objective City of London Police will:

- **Embed the new Code of Ethics** by supporting colleagues to deliver the highest ethical and professional standards in their service to the public.
- Continually improve workforce culture and standards of professional behaviour by implementing learning from inspections, investigations and inquiries including, for example, the Casey Review, the Angiolini Inquiry and His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS).
- Ensure our complaints, conduct and vetting processes are fair and proportionate by complying with national standards and encouraging internal and external scrutiny to identify and addressing any disproportionality.

## Priority 5. Be an employer of choice

City of London Police wants to attract the very best people into our organisation and once they arrive, we want them to stay, thrive and to progress. To do this we will have effective attraction and recruitment processes and ensure that once people are here, they feel well equipped (both physically and professionally), valued and supported so they can excel in their roles and deliver outstanding policing services.

### Objective a) We will attract, recruit and retain the best talent

City of London Police will continue to improve its approach attraction, recruitment and retention to ensure we build a diverse and skilled workforce with the right calibre and mix of staff at all levels of the organisation. To achieve this objective City of London Police will:

- **Maintain our officer headcount** to meet uplift targets and the requirements for new officers as part of the government's Neighbourhood Policing Guarantee.
- **Design and deliver an attraction strategy** to attract specialist capabilities in line with the priorities set out in our Strategic Workforce Plan, including tactical firearms, forensics, custody, analysis, and investigations.
- **Grow our Special Constabulary** of warranted, uniformed volunteer police officers to supplement the regular service and help to build links between policing and communities.
- Strengthen our economic crime capabilities in the investigation of fraud, domestic corruption and money laundering

### Objective b) Equip our people with the tools and skills they need to succeed

City of London Police continues to invest in its workforce to ensure our people are equipped with the tools and skills they need to excel in their roles and deliver an outstanding service to the public. To achieve this objective City of London Police will:

- Provide the technology our people need to perform their role effectively and efficiently including new laptops for all officers and staff in 2025, improvements to wi-fi connectivity and implementation of technology projects within the change portfolio.
- Work with the Corporation on the delivery of the Future Police Estate Programme providing a new operating environment across multiple sites from 2027 to support modern policing and improve operational effectiveness.
- **Develop our professional learning and development offer** for officers and staff in line with the priorities set out in our Strategic Workforce Plan, including rolling out the Police Leadership Programme for first and mid-line managers from 2025 and providing training for key professions (e.g. forensics and investigations) including through our Economic and Cyber Crime Academy.

### Objective c) Support the health and wellbeing of our people

City of London Police is committed to supporting the physical, psychological and social wellbeing of our officers and staff, including providing a healthy and safe working environment and offering a range of services providing mental health and wider wellbeing support. Our wellbeing priorities are mental health, sleep and fatigue recovery and preventative action. To achieve this objective City of London Police will:

- Use our Strategic Wellbeing Board, chaired by a Deputy Commissioner, to oversee and drive initiatives in support of our wellbeing priorities.
- Use our Wellbeing Ambassadors across the organisation to support Directorate level wellbeing initiatives.
- Continue to support officers and staff who have been assaulted in the course of their duties through the Operation Hampshire approach <sup>1</sup>

## Priority 6. Maximise our productivity

City of London Police is contending with a growth in the scale and complexity of policing demand in a challenging financial context. As a result, we must maximise our productivity - by which we mean improving the efficiency and effectiveness of our

<sup>&</sup>lt;sup>1</sup> <u>https://www.oscarkilo.org.uk/services/operation-hampshire</u>

services - to enable us to meet these demands, including the expectations of the communities we serve. The objectives below set out the ways in which we will maximise our productivity over the life for this Plan, from enhancing our use of data to making sure we are making the best use of our limited resources and improving our processes to make us more efficient and effective.

### Objective a) Use data effectively to inform our decision making

City of London Police recognises data as a vital strategic asset to policing. Its effective use can help to drive organisational effectiveness and efficiency by informing operational, tactical and strategic decision-making, including ensuring that our resources are directed to where they are most needed – and where they have most impact. Effective and responsible use of data can also improve our legitimacy by providing us with a better understanding of how crime and policing are affecting different groups of people, as a basis for addressing any inequalities or disparities, and more widely to demonstrate how we are responding to the concerns of our communities. To achieve this objective City of London Police will:

- **Provide safe and secure data systems** that protect sensitive information while enabling timely access to authorised personnel.
- **Produce high quality and accessible data** that enables confidence data-led decisions and efficient use of resources.
- **Improve data culture and skills** so everyone takes responsibility for responsible data recording and feels empowered to make confident data-driven decisions.
- **Prepare to harness emerging data and data-driven technology** to unlock new capabilities and optimise resources in line with our strategic priorities.

#### Objective b) make the best use of our limited resources

City of London Police will continue to ensure efficient and effective use of our funding and resources to provide value for money and maintain a high quality of service to the public. Through our business planning processes, based on our analysis of demand and our organisational capacity and capability to meet it, we identify organisational risks and opportunities and seek to allocate our limited resources effectively where they can have most impact. To achieve this objective City of London Police will:

• **Deliver value for money in all spending decisions** by continuing to improve our commercial proficiency, reviewing supplies and services and making sure

we get the best outcomes from our procurement exercises.

- **Improve our understanding and forecasting of demand** though horizon scanning, risk assessment and business planning process to strengthen our corporate planning.
- **Develop our approach to workforce planning** so we have the right mix of people, with the right mix of skills, in the right places, to deliver on our priorities now and in the future.

### Objective c) Make processes simpler, more effective and more efficient

City of London Police will work with a range of partners to review our processes, do things differently and harness the benefits of technology to make our processes more effective and efficient and ensure the best outcomes for our communities and our people. To achieve this objective City of London Police will:

- **Review and streamline processes**, driving continuous improvement through our Productivity Plan with an initial focus in 2025 on operational support (administration of justice) and corporate support (HR, finance, vetting).
- Make use of innovation and technology to free-up officers' and staff's time and improve our service to the public.
- **Drive effectiveness in our partnerships** to deliver better community safety outcomes including preventing crime and disorder.

## Our values

Our Policing Plan has our values of *professionalism, integrity and compassion* at its core. Our values closely align with the ethical policing principles set out in the police Code of Ethics (*courage, respect and public service*), which help our officers and staff – both individually and collectively – to ensure they are ethical and professional in the way they respect, listen, respond, improve and serve the public. Our values are central to achieving our mission as they underpin how we interact with the public, how we treat each other and how we achieve our shared objectives. We expect to be held to account for living these values in all we deliver as a police service.

City of London	Professionalism	Integrity	Compassion
Police values	We will deliver our services professionally and diligently. We will always expect the highest level of professional conduct by our people and commit to their continuous professional development.	We will earn the trust of diverse communities and partners through honesty and always doing the right thing. We will be open to scrutiny and transparent in our actions. We will respond to criticism with a willingness to learn and change.	We will act with humanity and kindness, ensuring our people and communities are treated with care and respect. We will create a culture of belonging and mutual trust and respect.
Ethical Policing Principles	Public Service Working in the public interest, fostering public trust and confidence, and taking pride in providing an excellent service to the public	Courage Making, communicating and being accountable for decisions, and standing against anything that could bring our profession into disrepute	Respect and empathy Encouraging, listening to and understanding the views of others, and seeking to recognise and respond to the physical, mental and emotional challenges that we and other people may face

## Professionalism

We will deliver our services professionally and diligently. We will always expect the highest level of professional conduct by our people and commit to their continuous professional development. We will live our value of professionalism by:

- conducting professional and thorough investigations into crime, including doing everything possible to protect those who are most vulnerable.
- expecting our officers and staff to be committed to professional development, both for themselves and for those they supervise
- ensuing our employees set an example to others.
- ensuring we meet the requirements and demands of our communities by providing them with high-quality, timely, efficient and effective services.

## Integrity

We will earn the trust of diverse communities and partners through honesty and always doing the right thing. We will be open to scrutiny and transparent in our actions. We will respond to criticism with a willingness to learn and change. We will live our value of integrity by:

- expecting our officers and staff to have the confidence and support of their colleagues to challenge behaviour that falls below expected standards.
- Being open to scrutiny, transparent in our actions and responding to criticism with a willingness to learn and change.
- ensuring the public can have confidence in the integrity of the data used and published by us, including making sure all crime is recorded ethically and in accordance with current guidance.

## Compassion

We will act with humanity and kindness, ensuring our people and communities are treated with care and respect. We will create a culture of belonging and mutual trust and respect. We will live our value of compassion by:

- taking time to listen to the views and experiences of others
- ensuring our officers and staff act with humanity and kindness, including safeguarding people at vulnerable times.
- valuing diversity, both as an employer and as a public service provider.
- ensuring everyone is treated with care and respect.

# Part 3: Delivering the Plan

# [photo]

## Funding

Like all police forces in England and Wales, most of our funding comes from the Home Office. This is in the form of a core grant to cover the basic operations of policing, as well as specific grants which cover areas such as counter terrorism policing and our national roles tackling fraud, economic crime and cyber crime. Unlike other Police and Crime Commissioners, the Corporation of London does not have the statutory power to raise additional funding through a Council Tax Precept. As an alternative, the Corporation applies a Business Rates Premium on businesses in the Square Mile. This funding goes towards security and policing within the City of London.

In partnership with the Corporation of London we are creating a sustainable mediumterm financial plan that creates the capacity to invest in vital police services through increased local funding and by mitigating the pressures of rising costs. With our unique location and proximity to the financial centre of the country, we also partner with the financial services industry in the fight against economic crime.

Around two-thirds of our spend is on pay and people. City of London Police employs officers and staff across both local and national roles. In 2025/26 the budget provides for a force establishment of XXX full time equivalent (FTE) police staff, XXX FTE officers and XXX temporary funded roles. To make sure our expenditure does not exceed our funding in 2025/26 we will need to sustain some £XXm prior year savings and mitigations made since XXX and add £Xm new ones in 2025/26.

We will continue to look at opportunities to manage our budget challenges through driving productivity improvements, maximising cost recovery for funded work, improved procurement, reviewing supplies and services, the use of proceeds from seized assets, improved working patterns to match need, efficient business support, improving supervision ratio, reducing overtime and improved use of mobile technology and agile working.

Figure 1 shows what we are spending our funding on in 2025-2026.

Figure 1: Expenditure breakdown 2025/26			
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## Working with others

The City of London Police cannot implement this Plan alone. Effective partnerships both with local and national agencies and with the communities we serve – is central to delivering the commitments in this Plan. We are proud to work closely with a wide range of organisations – public and private, local, national and international - all of whom play a vital role in keeping people safe in the City and online. Partnership working is woven through the objectives and commitments in this Plan, including close collaboration with the City of London Corporation (including the Safer City Partnership), the Metropolitan Police Service and British Transport Police, local criminal justice services, community, voluntary and faith groups, businesses and industry associations. And we cannot achieve our priorities without the valuable support of our diverse communities of residents, workers and visitors. Over the lifetime of this plan the City of London Police will continue to listen to, understand and take action in response to the views, experiences and concerns of our communities by ensuring they inform our strategies and plans, and help target our local and national policing activity.

## Governance, scrutiny and accountability

City of London Police has a range of strategies, plans, programmes and projects to translate the commitments set out in this plan into tangible delivery on the ground. We have robust internal governance arrangements, from operational and tactical meetings to strategic governance Boards, to monitor and drive progress against these, and our strategic priorities and objectives.

We encourage external advice and scrutiny through our Independent Advisory and Scrutiny Group (IASG)<sup>2</sup> which is made up of a diverse mixture of individuals from residential and business communities across the City. For example, the IASG advises us on the handling of critical incidents and policing policies and tactics including the use of stop and search powers. Independent Custody Visitors (ICVs) are trained volunteers that visit police stations unannounced to check on the treatment and welfare of people held in police custody.<sup>3</sup>

City of London Police is held to account for delivering on the commitments set out in this Policing Plan – and the Commissioner's wider responsibilities for delivering efficient and effective policing that responds to the needs of the public - by the City of London's Court of Common Council, which is the police authority for the City of London. The Police Authority Board will use the performance framework at *Appendix A* to hold the City of London Police to account for delivering this Plan.

Police Authority Board and Committee meetings are held in public, and agendas, papers and details of how to watch online can be viewed on the Police Authority webpages.<sup>4</sup>

There are also several national agencies that support the Home Secretary to oversee the work of City of London Police. His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) independently assesses

<sup>&</sup>lt;sup>2</sup> <u>https://www.cityoflondon.police.uk/police-forces/city-of-london-police/areas/city-of-london/about-us/about-us/equality-and-diversity2/independent-advisory-scrutiny-group/</u>

<sup>&</sup>lt;sup>3</sup> <u>https://www.cityoflondon.gov.uk/about-us/about-the-city-of-london-corporation/police-authority/about-police-authority/independent-custody-visiting</u>

<sup>&</sup>lt;sup>4</sup> <u>https://democracy.cityoflondon.gov.uk/mgCommitteeDetails.aspx?ID=142</u>

the effectiveness and efficiency of police forces and fire & rescue services – in the public interest,<sup>5</sup> and the Independent Office of Police Conduct (IOPC) - the police complaints watchdog for England and Wales – oversees the police complaints system, investigates the most serious complaints and conduct matters involving the police, and sets the standards by which the police should handle complaints.<sup>6</sup>

<sup>&</sup>lt;sup>5</sup> <u>https://hmicfrs.justiceinspectorates.gov.uk/about-us/what-we-do/</u>

<sup>&</sup>lt;sup>6</sup> https://www.policeconduct.gov.uk/about-us

# Appendix

# [photo]

## Appendix A: Policing Plan 2025 – 2026 Performance Framework [in development]

To note: Once the main content within the Plan is finalised we will develop a performance framework providing a clear line of sight between metrics and each of the Policing Plan objectives. As with the last Plan this will likely contain around 15 metrics. For the local policing priority: theft and violence rate metrics plus more activity focussed CT metrics. For the victims priority, metrics will be drawn from the existing victims strategy (including outcomes metrics). For the national econ/cyber priority metrics will be drawn from the national policing fraud/econ/cyber strategy. For the trusted and inclusive priority metrics will be drawn from the EDI strategy. For the employer of choice and productivity priorities metrics will be decided once commitments are firmed up.

For reference, metrics from the current policing plan are:

- 1. Reduce Neighbourhood Crime
- 2. Reduce Violent Crime
- 3. Reduce Anti-Social Behaviour
- 4. City of London Police positive outcome rate is higher than the national average
- 5. National Positive Outcomes for economic and cyber crime are increased
- 6. Law enforcement capabilities to tackle economic and cyber crime are developed through training and accreditation
- 7. Action Fraud Victim Satisfaction levels are improved
- 8. COLP Victim Satisfaction Levels are improved
- 9. COLP is a psychologically and emotionally healthy place to work
- 10. COLP workforce engagement levels are increased
- 11. COLP recruitment activity is improving how well its workforce reflects the communities it serves
- 12. Financial Outturn is within 1% of forecast
- 13. Staff agree they are well equipped to do their job
- 14. The public feel safe.
- 15. The public have confidence in the City of London Police

## City of London Policing Plan 2025 – 2028: Evidence base

# [To note: this section will be published as a standalone document alongside the Plan, with content added to clarify how each source has informed the Policing Plan]

City of London's Policing Plan for 2025 – 2028 has been informed by the results of extensive public consultation and a range of local and national strategies, reports and plans. This document provides more information on each of those sources and how they informed the Plan.

#### Consultation

#### Public consultation

From July to December 2024 City of London Police ran two phases of online public consultation. The consultation was advertised through a range of social media channels and face to face engagement events with residents, businesses and Members of the Common Council. The first phase of consultation (July to August) focussed on asking respondents what their policing priorities were. The top priorities were Terrorism (31%), Theft, Robbery and Burglary (20%), Knife crime (19%) and Violence against women and girls (15%). The second phase of online consultation (October to November 2024) asked respondents for their views on our draft priorities, with most (67%) respondents agreeing that they were the right ones. Across the two consultation phases the online survey received a total of 1778 visitors, with 167 respondents and 233 contributions (either a comment or a reaction).

#### Workforce consultation

We surveyed our officers and staff as part of the consultation period, and their responses - along with the findings of our annual staff survey - have informed our organisational priorities. From July to December 2024, we also ran two phases of online / in-person internal consultation for Police Officers and Staff. The consultation was advertised via the City of London Police Intranet and word of mouth at various workshops and discussions. The first phase of consultation (July to August) focused on asking staff and officers what their views are on our organisational priorities and what we should focus on in the next Policing Plan. 48% of our staff and officers said they were very satisfied that we reflected these priorities, and the majority (59%) of staff and officers believe the City of London Police have either completely or somewhat met the commitments of our three organisational priorities. The second phase of consultation (October to November 2024) asked staff and officers how they felt about our proposed organisational priorities for this Plan. 43% of our staff and officers said they were satisfied with these new priorities, and 28% said they felt neutral about them. Feedback was received via the online consultation and in-person workshops where over 100 responses were collected.

### Strategies, plans and reports

#### City of London Corporation Corporate Plan 2024 - 2029

The City of London Corporation's Corporate Plan sets out a vision for *a vibrant and thriving City, supporting a diverse and sustainable London within a globally successful UK.* As well as applying the principles underpinning the Corporation's Plan, our Policing Plan supports actions one to three of the 'Diverse Engaged Communities' Outcome, actions four and five of the 'Dynamic Economic Growth' Outcome and action two of the 'Vibrant Thriving Destination' Outcome. The Plan is available here: www.cityoflondon.gov.uk/about-us/plans-policies/our-corporate-plan

#### City of London Corporation People Strategy 2024 - 2029.

The City of London Corporation's People Strategy sets out a framework to ensure that all aspects of people management and development come together to create an organisational environment where employees can contribute their best work efforts. The Strategy will guide the Corporation in how it sets up employees for success; how it supports, challenges and motivates its people; how it maintains and delivers its mission and how it creates an inclusive and equitable environment. The organisational objectives in our Policing Plan support the themes set out in the Strategy. The Strategy is available here: <a href="https://www.cityoflondon.gov.uk/about-us/plans-policies/our-people-strategy">www.cityoflondon.gov.uk/about-us/plans-policies/our-people-strategy</a>

## City of London Police Equity, Diversity and Inclusion Strategy 2024 – 2027

City of London Police's Equity, Diversity and Inclusion Strategy sets out our plans for achieving our commitment to being one of the most trusted and inclusive police services in the country, which we have reflected in this Policing Plan. The Strategy is available here: <a href="https://www.cityoflondon.police.uk/SysSiteAssets/media/downloads/city-of-london/equality-and-diversity/equity-diversity-and-inclusion-strategy-2024-2027.pdf">www.cityoflondon.police.uk/SysSiteAssets/media/downloads/city-of-london/equality-and-diversity/equity-diversity-and-inclusion-strategy-2024-2027.pdf</a>

# *City of London Police Neighbourhood Policing and Engagement Strategy 2024 – 2025*

Our neighbourhood policing and engagement strategy sets out City of London Police's approach to achieving our Policing Plan 2022-2025 priority to *keep those who live, work and visit the City safe and feeling safe*. The Strategy is available here: <u>www.cityoflondon.police.uk/SysSiteAssets/media/downloads/city-of-</u> <u>london/nhp/colp\_neighbourhood\_strategy\_2024-25.pdf</u>

# City of London Police Violence Against Women and Girls Strategic Delivery Plan 2022 - 2023

City of London Police's Violence Against Women and Girls Strategic Delivery Plan outlines the work we will do to unremittingly tackle violence against women and girls, and to rebuild trust and confidence by ensuring we always police to the highest professional standards. The previous Delivery Plan is available here: <u>www.cityoflondon.police.uk/SysSiteAssets/media/downloads/city-of-london/aboutus/strategic-delivery-plan.pdf</u>

#### Code of Ethics (College of Policing guidance)

The 2024 Code of Ethics is inclusive and supports everyone in policing to do the right things in the right way for the right reasons. The Code has two parts: the ethical policing principles and guidance for ethical and professional behaviour in policing. The Code has the same status as other guidance produced by the College of Policing. The Code of Ethics is available here: <a href="https://www.college.police.uk/ethics/code-of-ethics">www.college.police.uk/ethics/code-of-ethics</a>

#### Counter Terrorism Strategy (CONTEST)

CONTEST is the United Kingdom's Strategy for countering terrorism, with the aim of reducing the risk from terrorism to the UK, its citizens and interests overseas, so that people can go about their lives freely and with confidence. The Strategy is available here: <a href="http://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2023">www.gov.uk/government/publications/counter-terrorism-strategy-contest-2023</a>

#### Crime Survey for England and Wales (CSEW): year ending June 2024

The Office of National Statistics provides information about crime against households and people aged 16 years and over, using data from police recorded crime and the Crime Survey for England and Wales (CSEW). Detailed findings from the latest release (October 2024) are available here:

www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinen glandandwales/yearendingjune2024

#### City of London Victims Strategy 2024 - 2027

In the context of the rising priority of victims services and outcomes nationwide, and the vital link between these and trust and confidence in policing, the City of London's first comprehensive victims strategy sets out in detail how we will deliver our commitment to put victims at the heart of all we do. The Strategy is available here: [add link once published]

#### Destination City Programme

The Destination City Programme is the City of London Corporation's growth strategy for the Square Mile as a world-leading business and leisure location. As well as setting out plans to attract new businesses, Destination City sets out exciting developments in its culture and leisure and offer, built upon the City's unique heritage and culture. The City will change and grow through these plans. It will attract crowds, create new wellness and sporting attractions, enhance the night-time economy, have more car-free areas and see an increase in residential population. More events in the City will require a focus on public safety, not only by deterring criminality, but also on the threats from terrorism. More information on Destination City is available here: www.cityoflondon.gov.uk/about-us/plans-policies/destination-city

#### Economic Crime Plan 2 [to add]

#### HMICFRS inspection reports

HMICFRS produce force level graded and national thematic reports on the effectiveness and efficiency of police forces in England and Wales and make recommendations for improvement. City of London Police acts in response to both local and national findings and recommendations to continually improve the services it provides to the public. HMICFRS assessments and reports relating to the City of London Police are available here: <u>hmicfrs.justiceinspectorates.gov.uk/police-forces/city-of-london/</u>

#### Policing Productivity Review

The Home Office commissioned the National Police Chiefs' Council to review police productivity and provide recommendations to improve efficiency and effectiveness in policing. City of London Police have used learning from this Review to establish its own productivity programme, which is reflected in the objectives sitting underneath the Plan's organisational priority to *'Maximise our productivity'*. The reports setting out the findings and recommendations emerging from the review are available here: www.gov.uk/government/publications/policing-productivity-review

National Cyber Strategy [to add]

National Fraud Strategy [to add]

National Policing Strategy for Fraud, Economic, and Cyber-crime 2023-2028

City of London Police produced the five-year National Policing Strategy for Fraud, Economic and Cyber-crime in 2023. The Strategy sets out a new mission to guide the national response to these crimes, including objectives for tackling each area of threat, with measurable objectives at a local, regional and national level. The Strategy has informed the priorities and objectives set out in our Policing Plan. The Strategy is available here:

www.cityoflondon.police.uk/SysSiteAssets/media/downloads/city-of-london/aboutus/colp\_national-policing-strategy-document.pdf

#### Safer City Partnership Strategy 2022 - 2025

The Safer City Partnership (SCP) operates as the City of London's statutory Community Safety Partnership (CSP). The partnership appoints the SCP Strategic Board which consists of statutory and voluntary organisations who work together to reduce crime and anti-social behaviour. The partnership is responsible for the delivery of a wide variety of strategies and plans with the overall aim of improving the safety of the community in the City of London. As part of this process a Community Safety Strategy is published every three years which focuses on an identified set of priorities. The priorities are intelligence led based upon analysis from the partnership's strategic assessment and results from public consultations. The current strategy is available here: www.cityoflondon.gov.uk/assets/Services-DCCS/safer-citypartnership-strategy-2022-2025.pdf

## Strategic Policing Requirement (SPR)

The 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 national threats set out in the SPR are violence against women and girls, terrorism, serious and organised crime, a national cyber incident, child sexual abuse, public disorder, civil emergencies, and cross cutting capabilities. Several of these threats – namely violence against women and girls, terrorism, fraud and cybercrime – are explicitly reflected in our local Policing Plan where they match our local objectives (based on consultation and our demand profile). However, City of London Police continues to maintain the capability to fulfil its national responsibilities in response to *all* the threats outlined in the SPR, including tackling serious organised crime, child sexual abuse, public disorder, civil emergencies and cross cutting capabilities. More information on the SPR is available here:

www.gov.uk/government/publications/strategic-policing-requirement-2023

#### Safer Streets Mission

The Government's Safer Streets Mission aims to reduce serious harm and increase public confidence in policing and in the criminal justice system, including halving

knife crime and Violence Against Women and Girls within a decade. Under the mission the Government has also committed to delivering the Neighbourhood Policing Guarantee and putting 13,000 additional police officers, Police Community Support Officers and special constables into neighbourhood policing roles to ensure visible and preventative community policing. More information on the mission is available here: <a href="http://www.gov.uk/missions/safer-streets">www.gov.uk/missions/safer-streets</a>

#### Improving public confidence in the police: An evidence-based guide

This guide supports senior police leaders and police and crime commissioners to help achieve the government's Safer Streets mission to reduce serious harm and increase public confidence in policing and the wider criminal justice system. It clearly sets out the best available evidence on public confidence in the police, as well as the policing activities that are most likely to have an impact. The guide is available here: <a href="https://assets.college.police.uk/s3fs-public/2025-01/Improving-public-confidence-in-the-police-guide.pdf?VersionId=XpjDwAk0rd7AjDXNdBY75ImCNWDJJ\_7k">https://assets.college.police.uk/s3fs-public/2025-01/Improving-public-confidence-in-the-police-guide.pdf?VersionId=XpjDwAk0rd7AjDXNdBY75ImCNWDJJ\_7k</a>

## Contact us [back page]

[To note: this page will include public enquiry and reporting a crime options, social media channels and a QR code for accessing the public confidence survey.]

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# Agenda Item 11

# **City of London Corporation Committee Report**

Committees: Community and Children's Services Police Authority Board Subject:	Dated: 16 January 2025 12 February 2025 Public report:			
Policy and protocol to tackle the negative impacts of rough sleeping	For Decision			
<ul> <li>This proposal:</li> <li>delivers Corporate Plan 2024-29 outcomes</li> <li>provides statutory duties</li> </ul>	Diverse Engaged Communities: Vibrant Thriving Destination Providing Excellent Services:			
Does this proposal require extra revenue and/or capital spending?	Yes			
If so, how much?	£ To be determined			
What is the source of Funding?	A funding bid will seek to provide a 6 month pilot			
Has this Funding Source been agreed with the Chamberlain's Department?	Longer term funding will need to be identified			
Report of:	Judith Finlay, Executive Director of Community and Children's Services			
Report authors:	Simon Cribbens, Community and Children's Services Nikki Gander, Chief Inspector, City of London Police			

#### Summary

This report presents a draft policy statement and protocol in support of interventions to tackle the negative impacts such as anti-social behaviour that can be associated with rough sleeping. It notes the harms to individuals from long term rough sleeping, and the negative impact on communities from behaviours that can be associated with rough sleeping. It seeks to ensure there is a transparent, balanced and proportionate approach that ensures continued welfare support, whilst protecting those who sleep rough and the wider community from harms.

It notes, that if approved, the implementation of the approaches set out will require resource to co-ordinate and properly manage them. A bid will be submitted to the Safer City Partnership for grant funding that could support an initial pilot period.

The report is for approval.

#### Recommendation

Members are asked to:

- Approve the draft policy, protocol
- Note risk and resource implications
- Note the proposed bid for funding to pilot an approach

#### Main Report

#### Background

- The City of London Corporation is committed to supporting those who sleep rough on the Square Mile to have a route off the streets tailored to their needs and circumstances. The Corporation invests in specialist outreach services, hostel accommodation (including provision for those with complex needs), a dedicated social worker, health and substance misuse services and a recently opened assessment centre providing emergency beds and a place of safe assessment away from the streets.
- 2. Services are delivered in the context of increased pressures with the level of rough sleeping increasing significantly across the capital. Many of those who sleep rough in the City are entrenched and have complex needs. Such individuals often refuse offers of support, accommodation and other welfare intervention. Others are without recourse to public funds, and therefore the service offered to them is very limited, and often unattractive to individuals concerned.
- 3. Almost all those who sleep rough in the Square Mile have slept rough elsewhere previously either another London local authority or elsewhere in the UK.
- 4. For those who are street homeless, rough sleeping presents considerable risks to health and wellbeing. Research by the homeless charity Crisis reports that people sleeping on the street are almost 17 times more likely to have been victims of violence in the past year compared to the general public.<sup>1</sup>
- 5. NHS England has reported that people experiencing homelessness and rough sleeping have a reduced life expectancy (44 years for men vs. national average of 79.4 and 42 years for women vs. national average of 83.1).<sup>2</sup>
- 6. Rough sleeping can also be associated with activities like begging, street drinking, substance misuse and other antisocial behaviour. For those who live, work or learn in the City, these behaviours can be intimidating or have detrimental impact, and where they persist, they may undermine confidence in the City Corporation's support services and the City of London Police.

<sup>&</sup>lt;sup>1</sup><u>New research reveals the scale of violence against rough sleepers | Crisis | Together we will end homelessness</u>

<sup>&</sup>lt;sup>2</sup> <u>PowerPoint Presentation (england.nhs.uk)</u>

- 7. Not all those who sleep rough engage in aggressive begging, anti-social or criminal activities. However, anti-social behaviour has been associated with the presence of tent encampments and rough sleeping "hotspots" in the City. This has included dangerous substance misuse practices, verbal abuse of Corporation officers and contractors, and defecation and urination in public spaces. The City Police has also responded to increased criminal activity related to rough sleeping encampments.
- The use of barbeques or fires for cooking sometimes experienced is dangerous. Encampments can also have wider detrimental impacts on the community, including deterring use of or blocking access to the highway or other public and privately owned spaces.
- 9. Homelessness support services also express concern that rough sleeping in tents can increase the risk of financial and sexual exploitation, and domestic abuse of some homeless people.
- 10. Two such encampments are present in the Square Mile one at Peninsular House close to the Monument, the other at Baynard House on Castle Baynard Street. Both have elicited concerns from Members, City businesses and City Corporation Officers, and requests for action to be taken.

#### **Current Position**

- 11. The City Corporation and City Police have co-ordinated action with wider partner services to reduce the impact of anti-social behaviour associated with individuals within the encampments at Peninsular House and Baynard House. While this has had a positive impact (including resulting in the acceptance of accommodation offers previously refused) several tents remain in these locations, with the continued risk to the wellbeing and safety of those who remain, and risk of negative impact on the local community.
- 12. The presence of tents and rough sleeping at Peninsular House has persisted for six years. During that period, the number of people sleeping rough fluctuates reaching 12-15 people at times. In April 2024 16 tents were present. Where numbers of tents or individuals sleeping rough have reduced, it is common for people to return, or for those new to rough sleeping in the City to occupy tents that remain.
- 13. At Baynard House in the west of the Square Mile twenty tents have been reported in this location. A recent violent incident established a crime scene preventing occupancy of some tents. Support offers to provide route off the streets to those occupying these tents had not previously been accepted. This group is mostly without recourse to public funds, and therefore the support offer focuses on regularisation of immigration status or supported return to country of origin. In the circumstances of the recent crime, the City Corporation has been able to use discretionary powers to provide temporary accommodation to nine

individuals. This enabled recent action to remove unoccupied tents and clean the area.

- 14. Interventions to respond to encampments in the City have been reactive in relation to escalating issues and risk. They have not been planned as part of a wider and longer-term approach. This is because the City Corporation does not have a clear policy position to guide and empower officers. Neither is there the necessary resource required for more co-ordinated and sustained interventions were that approach to be pursued.
- 15. It is notable that some other authorities where there is much greater issue and incidence have developed and resourced clear and agreed approaches in the form of policy, protocols or guidance. These ensure clarity and transparency about the approach to interventions, and a clear authorisation process which drives consistency with that approach. They ensure issues of welfare support, risk and proportionality have been fully considered and evidenced.
- 16. A range of powers exist that can be used to intervene with and tackle anti-social behaviour including that associated with the behaviour of some who sleep rough.
- 17. It should be noted that the limited use of enforcement powers to date such as Community Protection Notices - and any future use, is never solely because someone is sleeping rough or homeless.
- 18. A summary of the key powers is given in Appendix 1. They include powers that attach to an individual (such as those contained in the Anti-social Behaviour, Crime and Policing Act 2014), a location or address (Highways Act) or trespass. Some spaces are additionally protected by local bylaws.
- 19. Any enforcement action requires careful planning in terms of ensuring that capacity/wellbeing assessments take place before any action is taken and equalities and human rights assessments are completed. Action requires the involvement of a range of partners including homeless outreach services, social services, health services, cleansing services and the City Police.

#### Options

- 20. The options set out, and that recommended, have been informed by engagement with:
  - Thames Reach the specialist homelessness charity (provider of the City Corporation's rough sleeping outreach and assessment centre services)
  - Rough Sleeping Specialist Adviser Ministry of Housing and Local Government
  - Homelessness and Rough Sleeping Sub Committee
  - Chairman City of London Police Authority Board
  - City of London Police

- Homelessness and Rough Sleeping Strategy Group
- Safer City Partnership
- City of London Corporation services
- 21. The use of legal powers is rightly challenging, and open to legal challenge. It is imperative that such powers are used carefully and proportionately and are underpinned by robust evidence of both support to an individual, and the impact of behaviours. Their use must align with all with the legal obligations of specific powers and be underpinned by assessments of Equalities Impact and (for some powers) a Human Rights Act assessment.
- 22. Interventions are operationally complex and require a range of activity by many services and partners in advance and at the time. Consideration must be given to many humanitarian and practical issues.

#### Option 1: Welfare based//passive approach only

- 23. Although clusters of rough sleepers, such as those in tent encampments, can pose significant risks to the homeless and can adversely affect communities, the City Corporation and associated services might consider a passive approach in which only welfare support is offered. However, such an approach could enable tented encampments to persist, leading to environments that are unsafe for those who are street homeless, in which associated anti-social behaviour occurs, and which cause distress to communities. The focus of the City Corporation's response to rough sleeping has always been underpinned by the urgent need to prevent entrenchment and bring individuals into services that can provide support.
- 24. A welfare only approach reflects current practice, in which interventions to tackle negative behaviours have only been used when issues have escalated to a significant level.

#### Option 2: Planned and proactive approach to tackle the negative impacts

- 25. An approach based on tackling anti-social behaviour or using powers to address obstructions or trespass will necessarily have to be tailored, appropriate and proportionate. There may be circumstances where the use of such powers would not be proportionate, and therefore interventions would be very limited and fall short of the expectations or requests of some stakeholders.
- 26. If an approach were taken to clear a site because of the scale of negative impact related to it, consideration will need to be given as to how this will be sustained through follow up action or design changes.
- 27. It is proposed that an agreed policy, and protocol for its use, would provide for planned and proactive approaches to tackle the negative impacts of rough sleeping. This would not be an approach in isolation. Any intervention to address the negative impacts that can occur, would sit alongside a wider welfare offer including health, advice and accommodation offers.

- 28. Such a policy would reflect the balance of responsibilities the City Corporation and the City of London Police have to all sectors of the community.
- 29. The protocol would allow confident authorisation, ensuring demonstration that actions are a justified, reasonable and proportionate response to the detrimental effect of the activities.

#### Proposals

30. Option 2 is recommended.

- 31. A policy statement will set out the range of actions the City Corporation may take where there is anti-social behaviour associated with rough sleeping. It will provide the rationale for doing so, and the reassurance of the welfare and support targeted at those street homeless.
- 32. The policy will include the removal of abandoned property, including tents, and the circumstances in which they will be stored for a period in which the belongings can be reclaimed.
- 33. The proposed policy statement is found in Appendix 2. If approved, Members should consider whether this statement be made publicly available on the City Corporation website.
- 34. It will be accompanied by a protocol. This will be an operational tool but will set out the clear requirements of evidence both of negative impact and support to those affected that would inform decision making.
- 35. The protocol is designed to ensure that activity aligns with the values of the City Corporation's Homelessness and Rough Sleeping Strategy regarding the delivery of compassionate and humanitarian support to address the complex challenges linked to homelessness.
- 36. It recognises that there will be instances where partnership intervention may be required to address specific concerns and issues linked to rough sleeping associated crime and anti-social behaviour. Such interventions would be progressed where Initial interventions have failed to address the behaviour and reduce the harm being caused, and the behaviour is continuing or escalating. It must be evidenced that:
  - the behaviour is impacting numerous people and/or businesses;
  - the behaviour is impacting upon an agency's resources and day to day operations; and
  - the behaviour has significant impact on or could be reasonably expected to negatively impact - vulnerable people.
- 37. The protocol outlines the authorisation process to be used by the City Corporation. It will provide for consistency regarding the decision-making process

and to ensure an increased level of communication with the senior officers and relevant elected members.

- 38. The proposed protocol is found in Appendix 3.
- 39. The approval of both policy position and protocol will enable officers to act with confidence of political support, while providing Members with reassurance.
- 40. The City Corporation will always work alongside the City of London Police to deliver any intervention, to ensure it is managed safely.
- 41. The wording of the policy and protocol may be subject to revision for communications purposes or to reflect changes to operational structures and roles. Changes will not be made to the substance of the policy without the approval of Members.

#### **Risk and Issues**

Limitation of offer to those with "no recourse to public funds" (NRPF)

- 42. The current profile of those engaged sleeping rough in tented encampments suggests the majority are NRPF.
- 43. Despite the Government's intent to end rough sleeping, the law with regards to immigration status has not changed and no recourse to public funds conditions continue to apply.
- 44. These conditions limit the actions that local authorities can take especially in the provision of accommodation. Where individuals have care and support needs that meet the eligibility criteria for support under the Care Act, accommodation can be provided. Other duties and powers provide some very limited circumstances in which accommodation can be provided. Where accommodation can be provided, there is risk of a significant financial burden to the authority
- 45. Section 21 of the Care Act clarifies that local authorities are not required to provide care and support to a person who is subject to immigration control solely for the purpose of alleviating destitution when that person has no additional care and support needs.
- 46. Often, individuals who have NRPF will be aware of their status, and are reluctant to engage with outreach teams, or support offers that may be limited to advice or supported return to a home country.
- 47. The City Corporation's services will always provide advice and signpost to charitable organisations that offer services, and sometimes accommodation, to those who are without recourse.

Displacement

- 48. Interventions in response to anti-social behaviour can disrupt an area of concentrated rough sleeping. Such interventions can usefully encourage the take up of services and support previously refused. It can echo outreach practice, which does not seek to enable or support life on the streets, but challenges it assertively because of the significant risk street homelessness poses to individuals.
- 49. However, there is a risk that intervention may serve only to displace people sleeping rough from one area to another. These individuals may risk losing belongings or lose access to an area they perceive as good or safe for rough sleeping.
- 50. Such displacement could be across local authority boundaries which may create additional demands and challenges to the services in those areas.
- 51. This risk cannot be fully mitigated. Therefore, any planned intervention must weigh the impact of harms that are being addressed (or potentially not), against the risk the issue may be displaced.

#### Return

- 52. Interventions may serve to reduce rough sleeping encampments or hotspots. However, there impact may be short term with homeless people returning to an area, or others replacing those who have left. Since the operation to remove abandoned tents at Baynard House location, four new tents have been erected in the area.
- 53. Some powers such as a Public Space Protection Order (PSPO) attach to a space rather than an individual. A PSPO can have effect for up to for three years, and therefore may provide a longer-term intervention if enforced. A PSPO could be directed at the detrimental effects often associated with encampments and hotspots such as drugs paraphernalia, public urination/defecation and littering. The use of such powers must demonstrate the actual or likely detrimental effect and that it is, or is likely to be, persistent in nature.
- 54. Closure of areas, and design interventions, can deter hotspots and encampments from establishing or being returned to. Such changes can be difficult to secure and may have cost and other implications.

#### Legal Challenge and criminalisation

- 55. The use of powers and tools available to local authorities and the police is rightly open to legal challenge.
- 56. The establishment of a clear policy and protocol seeks to mitigate the risk of the disproportionate or inappropriate use of powers. Supporting processes will ensure that the necessary assessments such as an Equality Impact Assessment or Human Rights Act Assessment are in place, and the evidential base supporting intervention is robust and adequate.

- 57. Enforcement of powers such as Community Protection Notices or Public Space Protection Orders can escalate to criminal sanction. It is not the aim of this policy to criminalise rough sleeping.
- 58. It has been the experience of the City Corporation and City Police, that the use of powers such as a Community Protection Notice or Warning does have a deterrent effect. The possibility that failure to comply to with the terms of a power may lead to criminal action must be weighed against the impact on the wider community of anti-social behaviours.

#### Reputational risk

- 59. Action to tackle issues such as anti-social behaviour associated with rough sleeping encampments has in many local authorities attracted negative news and social media coverage. A communications strategy should be considered and sit alongside the action being taken.
- 60. However justified, there is a risk that it is portrayed as disproportionate and motivated by a desire to remove rough sleepers.
- 61. The policy and protocol set out to mitigate this risk by making clear the rationale for an intervention and the requirement for evidence of the support offer provided to individuals, and of the impact their behaviour or actions have.
- 62. Reputational risk and impact are likely to be short term.

#### **Equalities considerations**

- 63. An Equality Impact Assessment is appended (Appendix 4). Members are asked to consider and have due regard to the equalities impact assessment.
- 64. Equalities data for the whole City rough sleeping population demonstrates limited over-representation of protected characteristics. The most significant over-representation is in terms of male sex with males accounting for 90% of those recorded on the streets. Negative impacts are mitigated through a welfare led approach to ensure needs are properly assessed and support offers are available.
- 65. Further detail is being sought in relation to the characteristics of those in tented encampment to see if they diverge from the wider rough sleeping population.

#### Resourcing

- 66. The planning and delivery of interventions has a range of resource implications.
- 67. The primary need is for capacity to co-ordinate and plan activity. This would include the assembly of the required evidence in advance, securing authorisation for a planned intervention and the co-ordination of the range of partner services involved. There is no role in place to deliver this function.

- 68. There will be additional costs association with the delivery of any action such as translation, specialist advice, storage of belongings and specialist cleansing.
- 69. The City Corporation will offer provide emergency accommodation to those affected. Where this includes those without recourse to public funds (on a discretionary basis) this will be at the full cost to the City Corporation (other accommodation costs being offset by Housing Benefit). Recent action at Castle Baynard has cost the homeless budget almost £10,000 with costs continuing while accommodation is in place.
- 70. Interventions also require the resources of partners such as the City Police, homeless outreach services, the Community Safety Team and Cleansing Services.
- 71. Should Members approve the proposed approach, officers will bid for funding to pilot a role and provide supporting budget to the Safer City Partnership's Proceeds of Crime Act funding pot. The proposal is consistent with the priorities of the partnership's strategy and priorities for funding.

#### **Corporate & Strategic Implications**

#### Strategic implications

72. The policy is developed in line with the commitments and values of the City Corporation's Homelessness and Rough Sleeping Strategy.

#### Financial implications

73. Adoption of the proposed approach will have financial cost that are not currently budgeted for.

#### Resource implications

74. There is no current resource in terms of operational co-ordination and planning.

Legal implications 75.Noted within the report.

*Risk implications* 76. Noted within the report

Equalities implications

77. Noted within the report.

Climate implications 78. None

#### Security implications

79. None

#### Conclusion

80. The development of a clear policy and operational framework in relation to addressing encampments will provide confidence and clarity about the use of interventions in relation to the detrimental impacts of rough sleeping.

#### Appendices

- 1 Legal Powers Summary
- 2 Draft Policy Position
- 3 Draft Protocol
- 4 Equality Impact Assessment

#### **Simon Cribbens**

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#### Nikki Gander

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## Appendix 1 - Summary of key legal powers

Power	Description	Conditions	Requirement s	Outcomes	Pros	Cons	Additional Information
Anti-Social Behaviour, Crime and Policing Act 2014 (Section 1 injunction)	Court ordered injunctions to prevent individuals from engaging in antisocial behaviour.	An individual has engaged or threatens to engage in antisocial behaviour (harassment, alarm or distress to any parson)	Requires a known identity (specific person/s) – Not available to "persons unknown".	Injunctions against specific individuals who are engaging in ASB.	Individual prohibited from doing anything described in the injunction.	Using the courts would create publicity and require the identities of individuals within the encampment	Any evidence of anti-social behaviour must be specific to the individual named in the injunction.
Public Spaces Protection Order	Placing control of an area and everyone in it, implementin g appropriate restrictions on antisocial behaviour.	any person). Concrete risk to human health. Focus on the detrimental effect associated with the encampment (urination etc), rather than the tents being unsightly. Restrictions must then be justifiable and proportional	Requires evidence of a detrimental effect on the quality of life of those in the locality OR that the actions are likely to have such an effect.	The prohibiting of antisocial activities or orders for individuals to leave. This ultimately leads to the option of closing the walkway entirely.	Effective up to three years and can be extended. PSPOs focus on the space, so a named individual is not required.	The nature and extent of the problem, existing measures, and less restrictive methods must all be examined before a PSPO is proposed.	Would operate as the closure of the walkway (assuming it has no other legitimate uses e.g. evacuation route).
Community Protection Warning/No tice	A requirement to stop doing specific things (antisocial behaviour) to prevent detrimental effects.	Conduct must have had or is likely to have a detrimental effect on the quality of life, must be persistent and continuing, must be unreasonabl e. Restrictions must be justifiable and proportional.	Requires a known identity (specific person/s) – Not available to "persons unknown".	Collection of any item that was used in the commission of an offence (for destruction of disposal). Instructions to vacate the area, not to return, and to remove all belongings.	There is no minimum detrimental effect, number of people, number of incidents or timeframe.	Any evidence of anti-social behaviour must be specific and linked to a named individual.	The language used for CPWs, CPNs and PSPOs are very similar with regards to detrimental effects on quality of life.
Closure Order	Allows the City to close the premises for immediate respite for the community	That land use has resulted in serious nuisance to members of the public.	Requires a person that has engaged or is likely to engage in disorderly/of fensive/crimi	The walkway can be closed for a maximum of 3 months and can be extended for a further 3	This is a fast and flexible option. It could be a potential option whilst longer term	This is only a temporary option and provides no long-term solutions.	It is unclear whether the walkway constitutes a premises.

	that is affected by antisocial behaviour.		nal behaviour.	months, if the court agree the test applies (therefore, a total of 6 months in total).	measures are pursued.		
Highways Act 1980	The removal of tents blocking a public highway.	It must be decided whether the tents constitute an obstruction	Requires the tents are determined to be obstructing the "free passage along the highway"	The highways act grants the power to remove any structure "erected or set up on" the highway.	Removal of the encampment	It is likely to create a large amount of public backlash.	

Other legal avenues of inquiry include:

- Breach of Planning Control,
- Public Health (control of diseases),
- Local legislation,
- Police Dispersal Powers.

Additionally, before any action is taken the City must:

- 1. Be able to justify its action as proportionate to the distress that is caused by the encampment.
- 2. Carefully consider the Human Rights of the homeless as they are recognised as a vulnerable group.
- 3. Build up a robust evidence base documenting the anti-social behaviour (ASB) of individuals within the encampment.
- 4. Complete an Equalities Impact Assessment regardless of which measure is chosen.
- 5. Conduct an option analysis of other steps that might be taken to deal with the problem before taking legal action (to explain why less restrictive options are inappropriate).

#### **Appendix 2: Policy Statement**

City of London Corporation – Tackling the negative impacts of rough sleeping

#### Introduction

Our Policy approach: The City of London Corporation (the City Corporation) is committed to helping those who find themselves homeless on the streets. This means providing help and support, and safely managing the areas in which people sleep rough.

Sometimes there are impacts – such as increased antisocial behaviour – that are associated with rough sleeping which can have a negative impact on those homeless and on the wider community. Where these impacts are problematic, the City Corporation may use legal powers to manage and reduce them.

#### Balanced and proportionate

The approach to using legal powers to tackle some problems is described below. It aims to ensure there is a balanced and proportionate response that supports those who are vulnerable, and protects both them and the communities of the City. Our response to some issues may need the use of legal powers, but these powers are never used solely because someone is sleeping rough or homeless.

#### Credible Offers of support

Our approach sits alongside our Credible Offers Policy<sup>1</sup> - which commits to ensuring that everyone homeless on the streets of the Square Mile has a route off the streets. For many this will be accommodation, and for others it will be support to regularise immigration status or to achieve a planned and supported return to a home country.

#### Complexity and harm

Rough sleeping is complex. Many of those who sleep rough in the City are entrenched and have multiple needs. Such individuals often refuse offers of support, accommodation and other welfare intervention. Others are without recourse to public funds, and therefore the service offered to them is very limited, and often unattractive to individuals concerned.

However, long term rough sleeping puts individuals at risk. Sleeping rough poses significant risks to the health, wellbeing, and safety of those experiencing homelessness. Street homelessness is hazardous, distressing, and isolating. Individuals sleeping rough are more susceptible to violence and serious health issues.

#### Welfare first

<sup>&</sup>lt;sup>1</sup> <u>https://democracy.cityoflondon.gov.uk/documents/s139976/App.%201%20to%20Credible%20Offer%20Policy.pdf</u>

The approach we are setting out, balances our commitment to a welfare driven approach to rough sleeping, with the need to ensure the City is a safe, secure and accessible environment for all. Any intervention to address negative impacts will only be undertaken where there is both clear evidence of the support offer provided to individuals, and of the impact their behaviour or actions have.

### Supporting those who sleep rough

# Our Policy approach: The City Corporation is committed to assisting individuals who sleep rough in the Square Mile by providing tailored routes off the streets that address their specific needs and circumstances.

The City Corporation resources a range of specialised services including outreach services, specialist hostel accommodations, a dedicated social worker, health and substance misuse services, and a newly established assessment centre offering emergency beds and a secure assessment space away from the streets.

Our services, along with those provided by our partners, prioritise the urgent need to support individuals in transitioning away from street homelessness and mitigating the harms associated with long-term rough sleeping.

#### Limited or no recourse to public funds

Some of those who sleep rough have "No Recourse to Public Funds". This is a legal immigration restriction imposed by government policy which prevents the individual concerned from accessing welfare benefits and support other than in exceptional circumstances.

With people in this circumstance our services will work to ascertain if there is any underlying entitlement to public funds through, for example, achieving settled status under the EU scheme or working with advice/legal services and/or the Home Office to regularise immigration status. If this cannot be achieved – making a credible offer of accommodation impossible – the outreach team and our assessment centre staff will work with the individual rough sleeper to achieve a planned and supported return to a home country.

Consideration will also be given to providing temporary accommodation rough sleepers while immigration status is confirmed. In this case reasonable timescales should apply.

#### Supporting our communities

Our Policy approach: Where there are specific concerns of crime and anti-social behaviour linked to rough sleeping the City Corporation and its partners in the City of London Police, have a responsibility to act to safeguard those who are vulnerable and those in our wider community. We will always take a welfare first approach.

# We will never use such powers on somebody just because they are sleeping rough or are homeless.

Rough sleeping can sometimes be associated with activities like aggressive begging, street drinking, substance misuse and other antisocial behaviour. Encampments of tents can block pavements or put off people from using the pavement.

For those who live, work or learn in the City, these behaviours can be intimidating or have detrimental impact. Where they persist, they can cause distress and alarm.

Were the City Corporation intervenes to address these impacts, it will always take a welfare first approach. Identification and consideration of a person's specific circumstances, including their safeguarding and support needs, are an integral part of the City Corporation's approach. However, where detrimental issues persist or are likely to persist, we will consider the use of legal powers and tools to intervene.

#### Antisocial behaviour

Antisocial behaviour is defined as 'behaviour by a person which causes, or is likely to cause, harassment, alarm or distress to persons not of the same household as the person' (Antisocial Behaviour Act 2003 and Police Reform and Social Responsibility Act 2011).

There are three main categories for antisocial behaviour, depending on how many people are affected:

- Personal antisocial behaviour is when a person targets a specific individual or group.
- Nuisance antisocial behaviour is when a person causes trouble, annoyance or suffering to a community.
- Environmental antisocial behaviour is when a person's actions affect the wider environment, such as public spaces or buildings.

Where anti-social behaviour is associated with rough sleeping our specialist homeless outreach teams, and our community officers from the City of London Police will work with individuals to try and address the behaviour and reduce the harm being caused.

If anti-social behaviours persist or escalate, we will consider the use of legal powers where there is evidence that the behaviour is unreasonable, persistent, and has a detrimental effect on the quality of life of numerous people and businesses is the locality.

Powers such as a Community Protection Notice – or others – will only be used where the behaviours experienced is well evidenced and meets legal test required.

Where any power is used, the City Corporation will always continue to support those sleeping rough to end their homelessness.

#### Abandoned belongings

We will remove abandoned belongings if there is a public health risk, if they are causing an obstruction or if the owner tells us they no longer want them. We will remove belongings where they present a risk - such as a fire risk. Confiscation and destruction of tents or other personal possessions is not and never will be part of our approach for reducing rough sleeping.

Sometimes belongings are abandoned in the Square Mile, including sleeping bags, clothes and other personal possessions. We will only remove these if they appear obviously abandoned, if there is a public health risk, if they are causing an obstruction or if the owner tells us they no longer want them.

If belongings are left in the street and are not being cared for – for instance, they are strewn around rather than placed together – or are placed against a bin, we will treat them as litter and dispose of them. We also treat soaked and ruined bedding as litter.

#### Removal of sharps and needles

We will always remove sharps and dispose of them safely.

#### Storage of abandoned belongings

Unless there is an immediate public health risk or items are identified as litter, we will monitor abandoned items for 48 hours before removing them. We will store them for 28 days before disposing of them, and notify the police and outreach teams of their location.

We recognise that some possessions – such as identification documents – are very important, and hard to replace. We will retain these documents and work with homelessness services within and beyond the Square Mile to ensure that they are returned.

#### Removal of tents or other personal possessions

We will not confiscate or destroy tents or other personal possessions as part of our approach to reducing rough sleeping.

However, there are circumstances under which we are required to act to remove items. Environmental protection legislation means we have a duty to investigate what are known as "statutory nuisances". These are activities which are – or are likely to be – a nuisance which poses a threat to health.

In cases of statutory nuisance, we speak to people first. If the behaviour continues, or noone can be found, we have a duty to issue abatement notices. An abatement notice requires whoever is responsible to stop or limit an activity to avoid causing a nuisance. It can include specific actions to reduce the problem.

Where tents that have been clearly abandoned and are no longer being used we will remove them tents, and store them so they can be retrieved.

If tents are on highways and causing an obstruction, they can be removed under section 149 of the Highways Act.

For tents causing nuisance on the highway e.g., uncontained/discarded belongings, noise, ASB related issues, a 28-day Notice of intention to remove can be served under the Highway Act 1980. This will be enforced with police in attendance if necessary and removed by City Clean / a contractor.

#### More information and how to help

#### Find out more about our support and services for those sleeping rough here.

# If you are concerned about a rough sleeper, or sleeping rough yourself, you can report this online using the <u>Streetlink(external link)</u> website

You, or the individual you are concerned about, may also be able to use:

 <u>Providence Row(external link)</u> Day Centre 82 Wentworth Street <u>E1 7SA(external link)</u>

If you see someone sleeping rough and you think they are suffering the effects of exposure to cold or extreme hot weather, please contact emergency services on **999** 

Email the City Corporation's Homelessness Prevention and Rough Sleeping Service

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#### Appendix 3

#### City of London Corporation - Tackling the detrimental impacts of rough sleeping

#### operational protocol

#### 1 Overview

- 1.1 This protocol is designed to ensure that activity and intervention that addresses the detrimental impact of rough sleeping aligns with the vision and priorities of City Corporation's Homelessness and Rough Sleeping Strategy 2023-27.
- 1.2 The City Corporation's approach to rough sleeping will always focus on welfare. However, it is recognised that there will be instances where partnership intervention may be required in order to address specific concerns linked to rough sleeping associated crime and anti-social behaviour.
- 1.3 This protocol outlines the authorisation process to be used by City Corporation services and their partners, including the City Police, to ensure that activity is both appropriate and proportionate.
- 1.4 The protocol is designed to ensure consistency with regard to the decision making process and to ensure an increased level of communication with the senior officers relevant elected members.

#### 2 Definitions

- 2.1 Rough Sleeping: sleeping outside or in places that are not designed for people to live in, including cars, doorways or abandoned buildings.
- 2.2 Encampments are defined by the Local Authority as "persons dwelling within temporary forms of accommodation predominantly tents, and/or makeshift structures on land that is owned or maintained by the City Corporation or the Highway.

#### 3 Legal Framework and Compliance

- 3.1 The protocol is influenced by the relevant statutory framework outlined within the following legislation:
  - Anti-Social Behaviour, Crime, and Policing Act 2014
  - Homelessness Reduction Act 2017
  - Highway Act 1980
  - Local Government Act (Miscellaneous Provisions) 1982 and/or the
  - Human Rights Act 1998
  - Housing Act 1996
  - s.187B Town and Country Planning Act 1990
  - Public Health (Control of Disease) Act 1984
- 3.2 All intervention activity within the scope of this protocol will align with the relevant legal obligations with regard to the need to fully respect the rights of individuals experiencing homelessness.

#### 4 Engagement

- 4.1 The City Corporation's specialist homeless outreach service operates daily in the Square Mile to engage with people who are rough sleeping, offering support, information about available services, and to assess their immediate needs.
- 4.2 For those in areas that may be subject to the use of enforcement powers, they will undertake risk assessments that will seek to identify risks relating to mental health, substance misuse and other relevant matters in order to support the development of tailored support. These will identify individual needs, and the capacity of individuals.
- 4.3 Intervention activities will be tailored to ensure the safety and well-being of vulnerable individuals, providing appropriate support and access to the relevant support services.

#### 5 Planned Partnership Enforcement Activity

- 5.1 The City of London Community Multi-Agency Risk Assessment Conference (Community MARAC) will consider issues of anti-social behaviour and crime associated with rough sleeping hotspots and encampments. If it recommends that enforcement action is necessary to tackle issues, formal authorisation will be sought.
- 5.2 City Corporation services shall not take part in any pre-planned enforcement or intervention activity which is likely to impact individuals or groups who are rough sleeping without written authorisation from the appropriate senior officers.
- 5.3 Enforcement activity shall only be considered in instances where there is specific intelligence which highlights a clear link between rough sleeping and crime and anti- social behaviour. In these instances enforcement/intervention activity shall be considered as a last resort option when offers of support have been refused.
- 5.4 The Community Safety Team submit a request for authorisation to be considered by the Executive Director of X and X. These will be submitted at least seven days prior to the planned activity
- 5.5 The request for authorisation will include:
  - An outline of the issue with key risks and a community impact assessment.
  - Details of the impact on any vulnerable individuals and proposed action to be taken to mitigate the impact.
  - Details of any outreach engagement and support activity delivered to date.
  - Explanation why enforcement action is being proposed (last resort option).
  - Evidence of relevant assessments of risk, equalities and human rights as appropriate
  - Confirmation that items will be cleared and stored unless it is appropriate to dispose of them
  - Confirmation that where items have been removed and stored the homeless outreach team shall continue to engage with those sleeping rough to agree the return of any possessions within an agreed timeframe
  - Confirmation that items shall only be disposed of once an agreement has been reached or if items have not been collected within an agreed timeframe

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- Outline of any continued engagement and support to individuals sleeping rough to be provided post enforcement/intervention activity
- 5.6 The Community Safety Team will provide a briefing for relevant Members, Senior Officers and the Corporate Communications team.
- 5.7 The Community Safety Team will produce follow-up debrief reports after any authorised enforcement and intervention related activity has been completed. Debrief reports/briefings shall be completed within one week of any on-street, pre-planned and coordinated enforcement/intervention activity.

#### 6 Urgent Enforcement Planned Activity

- 6.1 This protocol recognises that there are instances where enforcement/intervention action may be necessary in order to respond to high level risks such as any threat to life/public safety or the need to mitigate offending behaviour and the resultant impact on local communities.
- 6.2 The City Police shall utilise the relevant statutory powers (Community Protection Warning and Community Protection Notice) to address anti-social behaviour. The use of the statutory powers should only take place in instances where engagement activity has not resulted in a reduction or cessation in anti-social/offending behaviour.
- 6.3 Enforcement activity shall be regarded as a last resort option when outreach support offers have not been accepted by individuals sleeping rough.

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## The Proposal

Assessor Name: Solomon Whittle	Contact Details:	Solomon.whittle@cityoflondon.gov.uk	
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## 1. What is the Proposal

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This proposal seeks to define the City of London Corporation's approach to tackling the negative effects of rough sleeping within the Square Mile. The City of London Corporation is committed to ensuring those who sleep rough on the Square Mile have a route off the streets tailored to their needs and circumstances. Many of those who sleep rough in the City are entrenched and have complex needs. Such individuals often refuse offers of support, accommodation, and other welfare intervention. The ugh sleeping can also be associated with activities like begging, street drinking, substance misuse and other antisocial behaviour. Not all those who sleep rough and rough sleeping in begging, anti-social or criminal activities. However, anti-social behaviour has been associated with the presence of tent encampments and rough sleeping thotspots" in the Square Mile.

The proposal ensures there is a balanced and proportionate response that supports those who are vulnerable and protects the communities of the City. It balances the Corporation's commitment to a welfare driven approach, whilst also ensuring that the City is safe, secure and accessible for all. Any intervention to address negative impacts will only be undertaken if there is clear evidence of both support offer provided and the negative impact of their behaviour.

### 2. What are the recommendations?

Outcome 1: The Corporation will continue to offer routes off the streets for all rough sleepers. Outcome 2: The Corporation established a framework to address the negative effects of rough sleeping (antisocial behaviour) Outcome 3: This proposal will work with the current Homelessness and Rough Sleeping Strategy 2023-2027.

### 3. Who is affected by the Proposal?

This proposal will affect rough sleepers in the Square Mile who sleep in encampments. Those sleeping rough in the Square Mile are predominately white British nationals between 26 and 45 years of age. *Rough sleeping presents considerable risks to health and wellbeing. Research by the* 

homeless charity Crisis reports that people sleeping on the street are almost seventeen times more likely to have been victims of violence in the past

Version Control Version:1.2 Author: Amanda Lee-Ajala year compared to the general public. People experiencing homelessness and rough sleeping have a greatly reduced life expectancy. Homelessness support services also express concern that rough sleeping in tents can increase the risk of financial and sexual exploitation.

## Age

Check this box if NOT applicable

**Age - Additional Equalities Data (Service Level or Corporate)** Include data analysis of the impact of the proposals The chart below shows the age profiles of those recorded as rough sleeping in the City of London from counts conducted in 2023/24. The largest cohort of rough sleepers remains the 36-45 year old (37.20%) ages 26-35 and 46-55 are the next highest (28.66% and 21.19% respectively). The City of London has a relatively low percentage of rough sleepers over the age of 55, and under 25 (8.54% and 4.42% respectively). The majority of the rough sleepers identified in the City of London are working age.

Chain Annual Report City of London 2023/24 – Breakdown of age among rough sleepers:

Version Control Version:1.2 Author: Amanda Lee-Ajala Last updated: 1 February 2022 Date of next review: 1 March 2023 What is the proposal's impact on the equalities aim? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact

#### Young People

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The City of London has low figures for those aged 25 and under sleeping rough. However, this figure will not include or identify the 'hidden homeless' who are more likely to be young people.

Action for Children have estimated that over 136,000 children and young people are homeless in the UK. <u>(What is the extent of youth homelessness in the UK? | Action</u> <u>For Children</u> – accessed October 2024. Research from Centrepoint also shows that there are strong links between rough sleeping as a young person and long-term <u>rough</u> sleeping and social exclusion in later life.

The drivers and impacts of youth homelessness and rough sleeping are often very <u>different from those of older adults, and as such consideration of these issues should</u> the included in any work, and distinct and tailored services and support in both the statutory and voluntary sector are in place.

The research from Centrepoint (Centrepoint (2019) No place to stay: Experiences of Youth Homelessness. London: Centrepoint.) also suggests that challenges related to the cost of living have intensified the key drivers for youth homelessness and rough sleeping for example family breakdown and domestic abuse.

#### Older People

Research also supports that homelessness amongst older people is also increasing, with the Centre for Policy and Aging rapid review (2017) (<u>CPA-Rapid-Review-</u><u>Diversity-in-Older-Age-Older-Homeless-People.pdf</u>) showing that between 2010 and 2015 the number of street homeless older people has more than doubled. The increased health issues experienced by those who are homeless and rough sleeping is likely to have a higher significant impact on those over 50 years of age considered older people (Crane M and Warnes A M (2010) Homelessness among older people and service responses, Reviews in Clinical Gerontology, 20; 354-363).

# What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The vast majority of individuals sleeping rough in the Square Mile are of working age. However, before a specific encampment is considered for action, the age profiles of rough sleepers within are crucial to ensure they are not going to be disproportionally affected by any action.

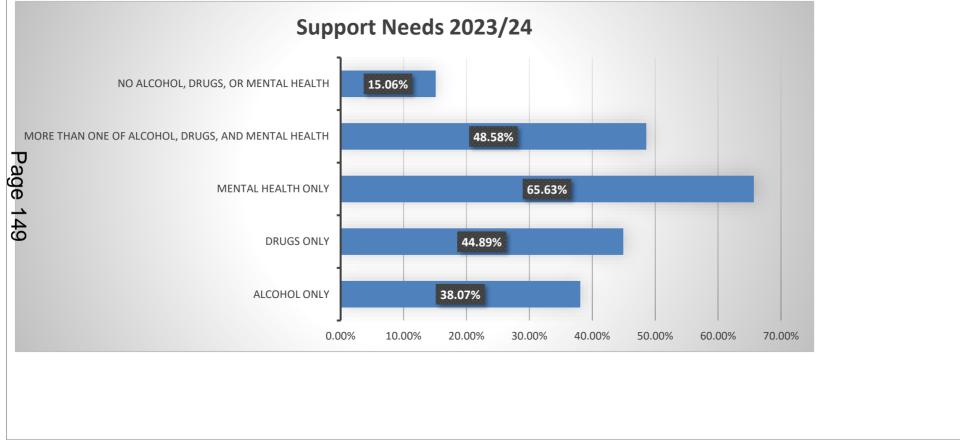
The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

Again, as with young people the drivers for homelessness in older people, is often different from other age demographics. Older women are more likely to cite relationship breakdown as a reason for becoming homeless, while older men associate becoming homeless with job loss and drug and alcohol problems (Crane & Warnes, 2010).	
Homeless older people are more likely than other groups to experience social isolation and its associated problems, as well as issues surrounding personal safety and health (Warnes A, Crane M, Whitehead N and Fu R (2003) Homelessness Factfile Sheffield Institute for Studies on Ageing, University of Sheffield; Crisis).	
Key borough statistics:	A number of demographics and projections for Demographics can be found on the
The City has proportionately more people aged between 25 and 69 living in the Square Mile than Greater London. Conversely there are fewer young people.	<u>Greater London Authority website in the London DataStore</u> . The site details statistics for the City of London and other London authorities at a ward level:
Approximately 955 children and young people under the age of 18 years live in the	<u>Population projections</u>
City. This is 11.8% of the total population in the area. Summaries of the City of	NB: These statistics provide general data for these protected characteristics. You
London age profiles from the 2011 Census can be found on our website.	need to ensure you have sufficient data about those affected by the proposal.

## Disability

**Disability - Additional Equalities Data (Service Level or Corporate)** Include data analysis of the impact of the proposals The Combined Homelessness and Information Network (CHAIN) analysis from 2023/24 showed that 47.60% of all recorded rough sleepers, had mental health support needs. This figure went up to 65.63% of all rough sleepers within the City of London, although it should be noted that CHAIN does not record any data on the other disability status of rough sleepers.

Chain Annual Report City of London 2023/24 – Breakdown of support needs among rough sleepers:



# What is the proposal's impact on the equalities aim? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact

Issues surrounding disability and homelessness also need to consider the increase in disabilities and long-term health conditions that are associated with older ages.

Research by Action for Children suggests that compared to the general population, individuals who are rough sleeping are far more likely to report mental health issues. A report for the City of London on healthcare for rough sleepers (Revolving Doors Agency, Health care provision for people sleeping rough in the City of London, June 2018) identified the following challenges:

- Health needs and preferences of people experiencing rough sleeping are not known or shared between services working with them.

- People experiencing rough sleeping in the City of London are likely to be accessing health services elsewhere in Greater London. Although little is known about the Greater London. Although little is known about the Greater to end outcomes of treatment received, evidence auggests that experiences and outcomes are unlikely to be positive. It is also unclear care and support services on offer to housed residents in City of London are accessible to people sleeping rough e.g. those accessed through a Care Act

- Mental ill-health is a significant issue for people experiencing rough sleeping. There is no clear pathway to services, and gaps in services, across the spectrum of need, for people in this situation, and those who have moved off the streets e.g., living in the Lodge, who may need continued support to sustain their homes.

- There are many services working across sectors that engage with people experiencing rough sleeping in the City of London, albeit to achieve different and potentially conflicting outcomes. Provision is weighted towards reactive and crisis management rather than planned and preventative. There is more than one meeting of partners to discuss individual cases and it is unclear how they relate, who is accountable for what, or how learning is applied.

*The Housing Act (1996) prioritises housing for disabled people and those with health conditions.* 

The United Nations Convention on the rights of Persons with Disabilities (UNCPRD) has introduced a new benchmark for the provision of adequate housing to disabled

## What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Before a specific encampment is considered for action, the support needs of rough sleepers within must be assessed through a Care Act assessment to ensure they are not going to be disproportionally affected by any action.

Care and support needs should be assessed through a Care Act assessment as it must be assumed that:

- Physical and/or mental ill-health are associated with rough sleeping, and there are likely needs arising from this ill-health;
- These needs are likely to prevent an individual sustaining a home and related outcomes e.g., accessing work;
- The needs and inability to achieve the specified outcomes cause or risk causing a significant impact on their wellbeing.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

people.	
<b>Key borough statistics:</b> Day-to-day activities can be limited by disability or long-term illness – In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%). In the areas outside the main housing estates, around 95% of the residents reponded that their activities were not limited. Additional information on	<ul> <li>The 2011 Census identified that for the City of London's population:</li> <li>4.4% (328) had a disability that limited their day-to-day activities a lot</li> <li>7.1% (520) had a disability that limited their day-to-day activities a little</li> <li>Source: 2011 Census: Long-term health problem or disability, local authorities in</li> <li>England and Wales</li> </ul>
responded that their activities were not limited. Additional information on Disability and Mobility data, London, can be found on the London Datastore.	NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Gender Reassignment - Additional Equalities Data (Service Level or Corporate) Include data analysis of the impact of the proposals No data is collected on the gender reassignment status of rough sleepers as part of the regular CHAIN reporting, so this impact is neutral.

What is the proposal's impact on the equalities aim? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?		
Gender identity is not identified in English homelessness statistics, even though AKT's research suggests that within the LGBTQ+ community, it is trans young people who are currently suffering the most. DLUHC confirms to Inside Housing that local	Before a specific encampment is considered for action, the support needs of rough sleepers within are crucial to ensure they are not going to be disproportionally affected by any action.		
authorities are instructed to collect data on gender identity. The official question asks people to identify as "male", "female" or "transgender". But most trans people would be unlikely to tick that last option.	The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.		
Tey borough statistics: O Gender Identity update 2009 - ONS	NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.		

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## **Pregnancy and Maternity**

Check this box if NOT applicable

Pregnancy and Maternity - Additional Equalities Data (Service Level or Corporate) Include data analysis of the impact of the proposals

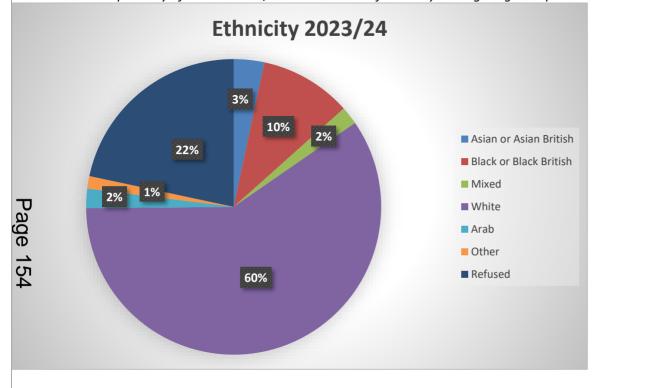
Version Control Version:1.2 Author: Amanda Lee-Ajala

Last updated: 1 February 2022 Date of next review: 1 March 2023 CHAIN data for rough sleepers in the City of London only identifies a small population of female rough sleeps (7%) and no data recorded for pregnancy or women rough sleeping with children.

What is the proposal's impact on the equalities aim? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
Families with children are generally prioritised as they are identified as needing statutory support. The highest reason for households to be accepted as in priority need is due to have dependants (across England there were 38,370 cases accepted due to this reason in 2017). Due to individuals faced with homelessness often fail to be recognised as vulnerable, despite being in danger, particularly single males who are identified as being at the lowest priority need.	Despite the City of London having low numbers of women with dependants or pregnant women, services must still be capable of responding to their needs in suitable ways. This demographic is generally prioritised as in priority need; therefore this proposal and on-going actions must look at how these individuals are supported. Before a specific encampment is considered for action, the support needs of rough sleepers within are crucial to ensure they are not going to be disproportionally affected by any action.
Reports from St. Mungo's show that socially excluded and vulnerable women are less likely to engage with services and have an increased risk of maternal death. Pregnancy is also a period where an individual is more vulnerable from a variety of foctors, including an increased risk of abuse and exploitation. Pregnancy has also been shown to either start or escalate domestic abuse. (Saving Mothers Lives – eviewing maternal deaths to make motherhood safer: 2006-2008 (2011) British lournal of Obstetrics and Gynaecology, vol 118, S.1.). Access to health care is frequently cited as a barrier to those homeless and rough sleeping, and therefore during periods of pregnancy and maternity, when access to access to health care is important, and this should also be in consideration.	The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.
Key borough statistics:         Under the theme of population, the <u>ONS website</u> has a large number of data collections grouped under:         • <u>Contraception and Fertility Rates</u> • <u>Live Births</u>	NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Race

**Race - Additional Equalities Data (Service Level or Corporate)** Include data analysis of the impact of the proposals The majority of the rough sleepers recorded in the Square mile in the 2023/24 CHAIN report where white (59.45% in total with the largest proportion being White British – 43%). Chain Annual Report City of London 2023/24 – Breakdown of ethnicity among rough sleepers:



What is the proposal's impact on the equalities aim? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact

A report from Crisis shows that there is clear evidence that ethnic minority and global majority groups are disproportionately affected by homelessness. Compounded with this is the increased likelihood for working adults from these communities to be in less affordable housing.

## What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

*This policy must have an understanding of race issues and the problems facing individuals with NRPF.* 

This could be done through:

Version Control Version:1.2 Author: Amanda Lee-Ajala 10% of applications for prevent and relief duty in 2020-21 were from Black led applicants, which when considered that in England lack people make up 3.5% of the population indicates the disproportionality of the risks to homelessness. According to research conducted by Shelter Bangladeshi households are also twice as likely to claim housing benefits than white households. (<u>The fight for home is a fight against</u> <u>racism - Shelter England</u>).

Anecdotal studies have found that abuse, threats, and assaults as hate crimes in hostels also lead to many global majority individuals preferring to rough sleep or sofa-surf than go into hostels, and very little research has been carried out in this arena.

Immigration policies and controls also have an influence in this area, and for those with No Recourse to Public Funds (NRPF)it is even more challenging to access support. Those with NRPF are more likely to skip meals, rely on food banks and face increased debt (<u>Why are people of colour disproportionately impacted by the</u> <u>busing crisis?</u> | <u>Shelter</u>). And even <u>research</u> from the Joint Council for the Welfare of mmigrants (JCWI) in 2017 found that over half of landlords (51%) were less likely to **Consider renting to foreign nationals from outside of the EU because of the Right to** 

Despite the population of City of London rough sleepers and statutory homeless being predominately UK nationals and white, awareness and training of the challenges facing the BAME, and non-UK population are essential.

Research has also shown that a multi-agency multi-disciplinary approach is key to responding to issues raised in these communities.

- Training for all front-line staff on the challenges faced by different population groups, including prejudice from the private rent market.
- Training for staff on how to support non-UK nationals, including ensuring they access the full range of support they are entitled to.
- Commissioning work into how services can tailor their support to meet the different needs of the population based on nationalities and cultural responses.

Through the national homelessness strategy, a cross-government working group has been set up around supporting non-UK nationals off the streets. There has also been a commitment of £5 million new funding to support non-UK nationals who sleep rough, with an increased focus on rough sleeping in the Controlling Migration Fund.

Before a specific encampment is considered for action, services available to support NRPF rough sleepers are crucial to ensure they are not going to be disproportionally affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

#### Key borough statistics:

Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White. The City has a relatively small Black population, less than London and England and Wales. Children and young people from minority ethnic groups account for 41.71% of all children living in the area, compared with 21.11% nationally. White British residents comprise 57.5% of the total population, followed by White-Other at 19%.

The second largest ethnic group in the resident population is Asian, which totals 12.7% - this group is fairly evenly divided between Asian/Indian at 2.9%; Asian/Bangladeshi at 3.1%; Asian/Chinese at 3.6% and Asian/Other at 2.9%. The City of London has the highest percentage of Chinese people of any local authority in London and the second highest in England and Wales. The City of London has a relatively small Black population comprising 2.6% of residents. This is considerably lower than the Greater London wide percentage of 13.3% and also smaller than the percentage for England and Wales of 3.3%.

See <u>ONS Census information</u> or <u>Greater London Authority projections</u>.

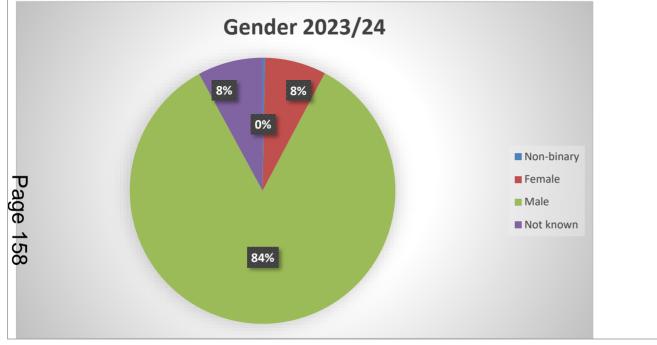
NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

## Religion or Belief

Religion or Belief - Additional Equalities Data (Service Level or Co	<b>rporate)</b> Include data analysis of the impact of the proposals			
Data is not collected on the religion or belief of rough sleepers, those at risk of homel	essness or those applying to the City of London for prevention or			
relief duties. Despite this there are faith groups that provide support for rough sleepers in the City of London				
What is the proposal's impact on the equalities aim? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact There is little to no research available in the United Kingdom for the direct or indirect impacts of spirituality and belief on incidents or individuals. The Department of Health (2011) identifies belief and spirituality as a broader way in which individuals understand and live their lives, through their core beliefs and values (Department of Health. 2011. Spiritual Care at the End of Life: a systematic review of the literature.). There are anecdotal reports that religion and belief may lead to incidents of may lead to family breakdown and tensions leading to homelessness and exclusions.	<ul> <li>return to homelessness.</li> <li>This could be done through:</li> <li>Consideration to training for all front-line staff on the challenges faced by different faith groups, including prejudice that may exist within the faith</li> <li>Training for staff on how to support non-UK nationals, including ensuring they access the full range of support they are entitled to.</li> </ul>			
<b>Key borough statistics – sources include:</b> The ONS website has a number of data collections on <u>religion and belief</u> , grouped under the theme of religion and identity.	NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.			
Religion in England and Wales provides a summary of the Census 2011 by ward level				

**Sex - Additional Equalities Data (Service Level or Corporate)** Include data analysis of the impact of the proposals The 2023/24 Annual CHAIN report showed that the overwhelming majority of Rough Sleepers in the City were male- 84.30%. Only 7.47% of all recorded rough sleepers that year had been female.

Chain Annual Report City of London 2023/24 – Breakdown of sex among rough sleepers:



What is the proposal's impact on the equalities aim? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact

2021 saw a shift in focus for many organisations to identify and create work specifically to support women who experience homelessness and rough sleeping. Especially as it is well known that women are likely to be much harder to identify. There is growing evidence that men and women experience homelessness differently, and the results of gender-neutral services can often lead to women avoiding seeking support.

## What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Even if few, actions to support women sleeping rough in the City of London will be important for this policy.

- Training for all front-line staff that may come into contact with females suffering from domestic abuse that need help.
- Training for all outreach workers on how to best support any females found sleeping rough in the City of London.

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Women who are homeless are especially vulnerable to violence and experience risk differently to men, subject to stigma, sexual abuse and harassment, robbery, and severe stress, in addition to violence, with the serious impact on physical and mental health that this has, as well as on self-esteem (Groundswell (2020) Women, homelessness and health: A peer research project. London: Grounswell). Homelessness is frequently viewed through the perspective of rough sleeping, yet studies have found that women will turn to sleeping on the streets as a last resort, as they would be at such risk, opting for other precarious and potentially unsafe arrangements, such as long-term sofasurfing, remaining with or returning to dangerous partners, or sexual exploitation in exchange for accommodation (Bretherton, J. and Maycock, P. (2021) Women's Homelessness: European Evidence Review. Brussels: FEANTSA.).	<ul> <li>Mitigation of disadvantage among the statutory homeless can be done by ensuring that the duties under the Homelessness Reduction Act (HRA) 2017 are fully undertaken by the City Corporation. The HRA provisions require local housing authorities to provide homelessness advice services to all residents in their area and expands the categories of people who they have to help to find accommodation. Individuals will be better supported through:</li> <li>A strengthened duty to provide advisory services.</li> <li>An extension to the period during which an applicant considered 'threatened with homelessness' from 28 to 56 days.</li> <li>New duties to assess all applicants (now including those who are not in priority need) and to take reasonable steps to prevent and relieve homelessness.</li> <li>These steps will be set out in a personalised housing plan that, wherever possible, must be agreed between the local authority and the applicant.</li> <li>Strengthen understanding of VAWG and the direct and indirect impacts on women.</li> <li>Before a specific encampment is considered for action, the support needs of female rough sleepers are crucial to ensure they are not going to be disproportionally affected by any action.</li> <li>The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.</li> </ul>
Rey borough statistics: At the time of the 2011 Census the usual resident population of the City of London	A number of demographics and projections for demographics can be found on the <u>Greater London Authority website in the London DataStore</u> . The site details
could be broken up into:	statistics for the City of London and other London authorities at a ward level:
• 4,091 males (55.5%)	Population projections
• 3,284 females (44.5%)	NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

**Sexual Orientation - Additional Equalities Data (Service Level or Corporate)** *Include data analysis of the impact of the proposals Data is not collected on the sexual orientation of rough sleepers, those at risk of homelessness or those applying to the City of London for prevention or relief duties.* 

What is the proposal's impact on the equalities aim? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
Action for children estimate that 24% of all homeless young people are LQBTQ+. Many people in the LGBTQ+ community, do not feel comfortable disclosing their sexual orientation or gender identity when rough sleeping. While young LGBTQ+ people are generally able to move on and exit the cycle of comelessness permanently, a 2018/19 study by Shelter found that trans people are trisk of homelessness and housing precarity throughout their lifespan.56 Common themes for young trans people are becoming trapped in unsafe relationships upon which their housing is dependent and with no family to turn to, sofa surfing, and experiences of hate crime, domestic abuse and sexual exploitation. The research also indicated that trans people had an overwhelmingly negative view of mainstream services and thus were unlikely to seek out services that could support them. This was due to a perception that they would not have anything to offer them that met their needs.	<ul> <li>Given that it is unclear how many LGBTQ+ people are among the City of London homeless population, it is critical that all front-line staff are aware of specific LGBTQ+ services and that signposting to these services makes up part of the standard package offered.</li> <li>The Homelessness Strategy and on-going actions ensure that training and awareness is incorporated across all service front line staff on how to effectively support LGBTQ+ people.</li> <li>Before a specific encampment is considered for action, the sexual orientation of rough sleepers within are crucial to ensure they are not going to be disproportionally affected by any action.</li> <li>The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.</li> </ul>
Key borough statistics:         • Sexual Identity in the UK – ONS 2014         • Measuring Sexual Identity - ONS	NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

## What is the proposal's impact on the equalities aim? Look for direct What actions can be taken to avoid or mitigate any negative

## Marriage and Civil Partnership

Marriage and Civil Partnership - Additional Equalities Data (Service Level or Corporate) Include data analysis of the impact of the proposals No data is collected on the marital or civil partnership status of rough sleepers as part of the regular CHAIN reporting. Some commissioned service partners have reported challenges when working with couples who are homeless and being able to provide them with appropriate support and accommodation.

<b>impact</b> but also evidence of <b>disproportionate impact</b> i.e. where a decision affects a protected group more than the general population, including <b>indirect impact</b>	impact or to better advance equality and foster good relations?		
Rough sleeping couples have become a familiar sight on the streets of many English towns and cities. The BWC report shows that most of these relationships develop among those already homeless, fuelled by a belief among highly vulnerable women that they are safer on the street in a couple, even where a relationship might be controlling, abusive or harmful. (Brighton Women's Centre, Couples first? Inderstanding the needs of rough sleeping couples, October 2018). wer than 10% of services in England will accept couples together, meaning that the couple may choose not to access support at all rather than be housed separately (St Mungo's (2020) Homeless Couples and Relationships Toolkit. London: St Mungo's).	<ul> <li>Though there may be few couples sleeping rough in the City of London this proposal must support these people through continued:</li> <li>Training for all front-line staff that may come into contact with couples sleeping rough. Such training should include being able to support couples into accommodation should they wish to stay together and also being able to identify whether there is any abuse.</li> <li>Ensuring the rough sleeping services commissioned by the City of London are supportive of couples that wish to remain together in seeking accommodation.</li> <li>Before a specific encampment is considered for action, the support needs of rough sleepers within are crucial to ensure they are not going to be disproportionally affected by any action.</li> <li>The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.</li> </ul>		
<ul> <li>Key borough statistics – sources include:</li> <li><u>The 2011 Census contain data broken up by local authority on marital and civil partnership status</u></li> </ul>	NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.		

Check this box if NOT applicable

## Additional Impacts on Advancing Equality and Fostering Good Relations

### Additional Equalities Data (Service Level or Corporate)

Click or tap here to enter text.

## Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

Click or tap here to enter text.

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not **considered above?** Provide details of how effective the mitigation will be and how it will be monitored.

Click or tap here to enter text.

This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the protected characteristics covered by these aims.

In addition to the sources of the information highlighted above – you may also want to consider using:

- Equality monitoring data in relation to take-up and satisfaction of the service ٠
- Equality related employment data where relevant
- σ Generic or targeted consultation results or research that is available locally. London-wide or nationally
  - Complaints and feedback from different groups.

## Additional Impacts on Social Mobility

## Additional Social Mobility Data (Service level or Corporate)

Click or tap here to enter text.

## Are there any additional benefits or risks of the proposals on advancing Social Mobility?

Click or tap here to enter text.

## What actions can be taken to avoid or mitigate any negative impact on advancing Social Mobility not considered above?

Provide details of how effective the mitigation will be and how it will be monitored.

Click or tap here to enter text.

This section seeks to identify what additional steps can be taken to promote the aims or to mitigate any adverse impact on social mobility. This is a voluntary requirement (agreed as policy by the Corporation) and does not have the statutory obligation relating to protected characteristics contained in the Equalities Act 2010. Analysis should be based on the data you have available on social mobility and the access of all groups to employment and other opportunities. In addition to the sources of information highlighted above – you may also want to consider using:

- Social Mobility employment data
- Generic or targeted social mobility consultation results or research that is available locally, London-wide or nationally
- Information arising from the Social Mobility Strategy/Action Plan and the Corporation's annual submissions to the Social Mobility Ind

## **Conclusion and Reporting Guidance**

Set out your conclusions below using the EA of the protected characteristics and submit to your Director for approval.	Review your EA and action plan as necessary through the development and at the end of your proposal/project and beyond.
If you have identified any negative impacts, please attach your action plan to the EA which addresses any negative impacts identified when submitting for approval.	Retain your EA as it may be requested by Members or as an FOI request. As a minimum, refer to any completed EA in background papers on reports, but also include any appropriate references to the EA in the body of the report or as an
If you have identified any positive impacts for any equality groups, please explain how these are in line with the equality aims.	appendix.

## This analysis has concluded that ...

This analysis has indicated that the proposal has little potential for discrimination against protected characteristics. The proposal will have no negative impact on protected characteristics of race, gender, disability support needs, and age of rough sleepers. This assessment will be updated if new data emerges

**Outcome of analysis** – check the one that applies

## - Outcome 1

Bo change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been **D**aken.

## 🕰 Outcome 2

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Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustment will remove the barriers identified.

## Outcome 3

Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

## Outcome 4

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Director: Simon Cribbens

Name: Simon Cribbens

Date 22 November 2025

Version Control Version:1.2 Author: Amanda Lee-Ajala

## Agenda Item 12

Committee(s): Corporate Services Police Authority Board Policy and Resources Subject: Draft High-Level Business Plan 2025/26 – Town Clerk's Department	Date:12 February 202512 February 202513 February 2025Public report:For Decision
<ul> <li>This proposal:</li> <li>delivers Corporate Plan 2024-29 outcomes</li> <li>provides statutory duties</li> <li>provides business enabling functions</li> </ul>	Providing excellent services Diverse Engaged Communities Vibrant Thriving Destination Dynamic Economic Growth
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	£
What is the source of Funding?	[add details]
Has this Funding Source been agreed with the Chamberlain's Department?	Yes/No [delete as applicable]
Report of:	Greg Moore Deputy Town Clerk
Report author: Sarah Scherer, Head of Business Support	

## Summary

This report presents for approval the high-level Business Plan for the Town Clerk's Department 2025/26. It applies specifically to the following enabling functions led by the Deputy Town Clerk:

- Governance and Member Services
- Office of the Policy Chairman
- Strategic, Security & Resilience
- Health & Safety
- Police Authority

The Office of the Lord Mayor and The London Archives/Culture Team, which also sit under the Deputy Town Clerk, will report in separate, individualised business plans, as will other areas of the Town Clerk's Department (e.g., Corporate, Strategy and Performance and Communications).

## Recommendation

Members are asked to:

- i. Note the factors taken into consideration in compiling the Town Clerk's Departmental Business Plan, acknowledging that these teams provide both enabling and statutory functions which are scrutinised by different Committee and:
- ii. Approve, subject to the incorporation of any changes sought by the relevant Committee, the departmental Business Plan 2025/26.

## **Main Report**

## Background

- As part of the new framework for corporate and business planning, departments were asked to produce standardised high-level, Business Plans for the first time in 2017 for the 2018/19 year. Members generally welcomed these high-level plans for being brief, concise, focused and consistent statements of the key ambitions and objectives for every department.
- 2. High-level Business Plans for FY 2025/26 align to our Corporate Plan 2024-2029. As a high-level plan, this document does not capture the granularity of departmental work but gives the overall picture of departmental activity, customer feedback, trends where applicable and direction of travel.
- 3. The Town Clerk's Department is comprised of several enabling teams which support the core business of the Corporation. It is responsible for ensuring the overall strategic objectives of the City Corporation implemented in accordance with our corporate governance framework. The Department provides the expertise and oversight to ensure that Members and Officers have the information they need to facilitate effective decision making. As a cross-cutting Department, the teams overseen by the Deputy Town Clerk within this wider area work closely with all Corporation departments and our Institutions in pursuit of this objective.
- 4. The Town Clerk's Department oversees the co-ordination of political and policy advice provided to our Leaders and Members, programme implementation and management of key initiatives such as initiatives within the Mayoral theme and Destination City, and the day-to-day logistical operations of the private offices supporting the Lord Mayor and Chairman of the Policy and Resources Committee, in addition to supporting the Town Clerk through their secretariat. It facilitates decision-making, Member scrutiny and oversight, and ensures statutory obligations are met (e.g. in relation to the accountability of the City of London Police, our health and safety obligations, our emergency planning and resilience functions, and so on).

## Draft final high-level Business Plan for 2025/26

- 5. This report presents, at Appendix 1, the draft final high-level Business Plan for 2025/26 for the Town Clerks' Department and the aforementioned teams.
- 6. The Office of the Lord Mayor and The London Archives (formerly the London Metropolitan Archives), which are also under the remit of the Deputy Town Clerk, will report in separate, individualised business plans to relevant committees.
- 7. While the teams which report into the Deputy Town Clerk have individualised deliverables, projects and activities – which often intersect – they share commonality in that they provide enabling support within 4 major workstreams:
  - a. Governance Support
  - b. Statutory and regulatory compliance
  - c. Member and Officer Support
  - d. Cross-corporate coordination
- 8. Taking on board feedback from Members in relation to last year's Business Plan, which for the first time sought to integrate various functions into a single Plan, this year's Plan has been integrated further to reflect and drive greater integration between the various functions, drawing on the commonality of activity and purpose across the service areas and moving away from the historic approach of discrete, individual Business Plans and workstreams for each area, towards a newer approach which will help to drive greater collaborative working and recognise the coherency and synergy across the various teams' areas of activity.
- 9. Following the appointment of the Executive Director and Private Secretary to the Policy Chairman as Senior Responsible Officer for Destination City, the Town Clerk's Departmental Business Plan also included the implementation and delivery of the new DC programme in a separate workstream.
- 10. The high-level plans have been developed in consultation with senior officers, with the intention of establishing and confirming core workstreams that reflect the functions and responsibilities of these teams at a high level as opposed to separate workstreams for each team.
- 11. As mentioned above, in drafting their business plans, teams have focused on cross-departmental collaboration. The Office of the Policy Chairman business planning process and underlying items, for example, has involved liaison with Innovation & Growth, Corporate Communications, Remembrancer's and Mansion House; Governance and Member Services with the Corporate Strategy team; Health & Safety with HR and the key connectivity to the People Strategy, and so on.

- 12. These functions represent a headcount of 54 FTE all based in the Guildhall complex.
- 13. Governance and Member Services
  - a. The Governance and Member Services team in the Town Clerk's Department is dedicated to supporting the Corporation's decisionmaking process and supporting Members in their work as elected officials and representatives of the City of London Corporation. The Team is comprised of 20 individuals who support with the day-to-today operations of committees, on matters of procedure, and by providing learning and development opportunities.
  - b. Led by the newly-appointed Assistant Town Clerk, the Team oversees the formal process, reporting requirements and services of over 500 formal decision-making meetings each year, including meetings of the Court of Common Council and Court of Aldermen, their committees, sub-committees and working parties.
- 14. Office of the Policy Chairman
  - a. The Office of the Chairman team works to support the Policy Chairman, Deputy Policy Chairman, Vice Chairs, and Lead Members in their roles in providing political leadership for the Corporation in the development of policy and drive the Corporation's aims and objectives, working closely with external stakeholders.
- 15. Strategic Security and Resilience
  - a. The City of London Resilience Planning team has a duty and statutory function that offers a specialist resource aimed at helping both the City Corporation and supporting the wider Square Mile community to maintain its resilience in the face of emergencies and other business disruptions.
  - b. Led by the Strategic Security Director & Counter Terrorism Advisor, the team aims to raise awareness in the Square Mile community of all aspects of contingency planning, preparing for localised and Pan-London incidents supporting the wider City of London community with a key task to ensure the consistency of the Corporation's own preparedness to respond to an emergency.
- 16. Corporate Health & Safety
  - a. The Corporate Health & Safety is dedicated to ensuring appropriate and sufficient systems are in place to support our governance of Health & Safety risk. These mechanisms support the Corporation's decisionmaking process and support Chief Officers in discharging the legal requirements set upon us as an ethical, modern employer.
  - b. The team is comprised of eight individuals who provide advice, develop, maintain our policies, procedures, and safety data systems, such as accident reporting and are critical in setting our organisational

safety culture. Critically they make up the competent health and safety resource as required by statute under various safety related pieces of legislation, e.g. Fire.

- 17. Police Authority
  - a. The Court of Common Council is defined as the Police Authority for the Square Mile. The Court delegates this duty (except for the appointment of the Police Commissioner) to the Police Authority Board and its Committees (Strategic Planning and Performance; Resource, Risk and Estates; Professional Standards and Integrity; Economic Crime and Cyber; and Police Pensions Board). The Board is supported by the Director of the Police Authority and 6 staff members.
  - b. The Police Authority team supports the Police Authority Board (PAB) in carrying out its essential role to scrutinise and support the City Police's delivery of effective and efficient services, ensure value for money in how it is run, and to agree its priorities across its national and local roles, taking into account the views of local communities and government priorities. The team ensures that PAB's statutory obligations in relation to the accountability of the City Police are fulfilled.

## Departmental Operational Property Assets Utilisation Assessment

18. In keeping with the requirements of Standing Order 56, a utilisation assessment has been undertaken of the corporate space occupied by the relevant sections of the Deputy Town Clerk function covered in this report.

## **Corporate & Strategic Implications**

- **Strategic implications** CSPT has a key role in enabling the City of London Corporation achieve strategic outcomes and will continue to engage with Members, Officers, and external stakeholders to ensure the successful delivery of strategic priorities.
- **Security implications** several of the functions within the Department directly support the security arrangements for the City Corporation.
- Financial implications Budgetary resources allocated to each workstream noted in the high-level Business Plan have been considered and can be adjusted in-year to account for emerging needs and requirements.
- Equalities implications All the services and functions covered in the report are committed to Equality, Diversity and Inclusion. We will continue working closely with the Director of Equality, Diversity and Inclusion and the Chief People Officer to enable the City of London Corporation to comply with all obligations under the Equality Act 2010 and the Public Sector Equality Duty relevant to respective functions
- **Resourcing implications** Staff resources allocated to each workstream noted in the high-level Business Plan have been considered and can be adjusted in-year to account for emerging needs and requirements.
- Risk Implications None.
- Climate Implications None.

## Conclusion

19. This report presents the high-level Business Plan for 2025/26 for the relevant functions of the Deputy Town Clerk's Department for Members to consider and approve.

### Appendices

• Appendix 1 – Final high-level Business Plan 2025/26

## TOWN CLERK'S DEPARTMENT 2025/26 BUSINESS PLAN

## About us: Our purpose, aims and impacts

The Town Clerk's Department is comprised of several enabling teams which support the core business of the Corporation.

It is responsible for ensuring that the overall strategic objectives of the City Corporation, including those of our Institutions, are lawfully and actively implemented.

The Town Clerk's Department oversees the co-ordination of political and policy advice provided to our Members, programme implementation and management of key initiatives (such as the Mayoral theme and Destination City), and the day-to-day logistical operations of the private offices supporting the Lord Mayor and the Chairman of the Policy and Resources Committee.

The divisions of the team include:

- Governance & Member Services
- Office of the Policy Chairman
- Strategic, Security & Resilience
- Health & Safety
- Police Authority

The Town Clerk's Department provides the expertise and oversight to ensure that Members and Officers have the recommendations and information they need to facilitate effective decision making and scrutiny, fulfilling our statutory obligations (such as in respect of the City of London Police).





## Our key objectives and priority workstreams and major projects

Key Objectives / Priority workstreams:

- 1. **Governance Support** facilitating effective decision-making and oversight ensuring that all Corporation activities align with established governance structures, promoting transparency and accountability across departments in accordance with our Standing Orders and wider corporate governance framework.
- 2. **Statutory and regulatory compliance** monitoring compliance with all relevant laws and regulations, reducing legal risks and ensuring the Corporation is seen as a leader.
- Member and Officer Support providing Common Councillors and Aldermen with the necessary resources and information to fulfil their roles effectively, enhancing their ability to make informed decisions that reflect the City Corporation's strategic objectives through the Court of Common Council, Court of Aldermen and our Committees.
- 4. **Cross-corporate coordination** coordinating efforts and resources to support or drive successful implementation of cross-corporate organisational projects, transformation, and collaboration; ensuring coherence and alignment and ensuring corporate policies are up to date and remain effective given changing external and internal partnership landscapes.
- 5. **Destination City (DC) -** implement the recommendations from the Martin Review to deliver a new DC programme alongside partners to achieve our shared goal of positioning the Square Mile as a vibrant thriving destination, which contributes to dynamic economic growth.



Priority workstream	Funding allocation %	People resource %	Corporate Plan 2024-2029 Outcomes	Outcome focused Performance measures	Outcomes /Impacts
<ul> <li>Governance Support</li> <li>Improved corporate understanding of Governance framework</li> <li>Review and cross-referencing of Committee reports including transformational projects such as: Ambition 25, Barbican Renewal, Charities review</li> <li>Support with the re-constitution of Committees post March 2025 elections; and election of Chairs/Deputies</li> <li>Developing and implementing an approach to reform Police Authority Board (PAB) governance and increasing its efficiency and effectiveness as a scrutiny body</li> </ul>	40% N/A – No specific budget	40% 25%	Providing excellent services	Increase in the percentage of staff who understand the CoLP governance mechanisms Reduction in the amount of decisions determined by urgency	Members and Officers understand their roles and the CoLC strategic objectives Improved and effective decision making at pace
<ul> <li>Statutory and regulatory compliance</li> <li>Develop a three-year Health &amp; Safety Strategy</li> <li>Implement Everyday Safety Manager training programme</li> <li>Maintain key systems under the Health &amp; Safety Framework, Risk Assessment tool, Incident Reporting tool and procurement extension of the Safe365 Assurance tool (June 2025)</li> </ul>	4% (supplemented through additional resource bids)	34%	Providing excellent services	<ul> <li>1125 leaders trained by end of FY 26/27</li> <li>562 – 25/26</li> <li>563 – 26/27</li> <li>Safety Index Score of 65% across 80% of areas</li> <li>100% Assurance audit completion</li> </ul>	Improved safety leadership and reduced safety risk Alignment of safety into the people strategy
<ul> <li>Member and Officer Support</li> <li>Comprehensive Member induction and training for newly elected and returning members following Common Council Elections</li> <li>Support the Policy Chairman to discharge their duties as a key spokesperson and lead the Corporation's external relations with</li> </ul>	20%	20%	Providing excellent services Diverse Engaged Communities	Members participating in training and induction sessions - minimum 50% participation for new Members and 25% for returning Members	Members and Officers understand their roles and the CoLC strategic objectives

Priority workstream	Funding allocation %	People resource %	Corporate Plan 2024-2029 Outcomes	Outcome focused Performance measures	Outcomes /Impacts
Westminster, Brussels, London local government and internationally					Improved and effective decision making at pace
Partnership, to implement a revitalised approach to engaging the City's communities on	4% N/A - No specific budget	50% 15%	Vibrant Thriving Destination Diverse Engaged Communities Providing Excellent Services	Reduce local and neighbourhood crime and improve confidence in the CoLP	More effective use of resources Better, and more coordinated engagement with key stakeholders
Destination City Recruit and onboard new DC programme Hub	Funding allocation via Growth Bid £1.3 mil	4%	Vibrant Thriving Destination Dynamic Economic Growth	Increase visitor numbers, expenditure and visits to our cultural attractions Increase worker footfall Friday/Monday Delivering regeneration and redevelopment projects	There are more businesses based in the Sq. Mile, more workers and visitors spend their leisure time here.

## Our timeline planner of activities and milestones

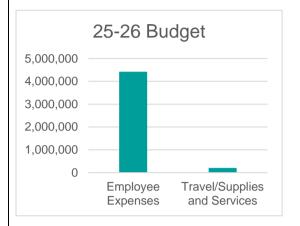
											ey		ition of ac	ctivity
	C	Quarter 1 Quarter 2		(	Quarter	3	Quarter 4		1		eyond 25/26			
	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	2026/ 2027	2027/ 2028
Member Induction	Will be	delivered	d April - 、	July										
Governance Training														
Governance support in the delivery of cross- org objectives &			Ν	/lilestone	es will ma	tch those	e of the se	ervice de	partment					
Workstreams Strategic and tactical leadership training					Ongoi	ng throu	ghout the	year						
Internal volunteering to support emergency centres					Ong	joing thro	oughout t	he year						
Leadership Safety inductions	1,125 Leaders to be trained													
Safe365 annual assurance assessment across all High-Risk departments		¢ /	Assuranc	e progra	mme to c	commenc	ce May - S Commi		er review	by Corp	orate Ser	vices		

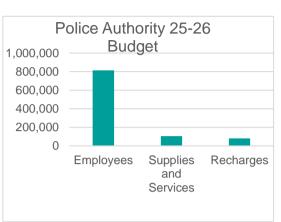
PAB Community Engagement	Report quarterly to the Strategic Planning and Performance (Police) Committee												
PAB Governance		•		•			•		•				
Police Authority in May (to agree the reform proposals – implementation throughout the rest of the year													

#### People

2024 Staff Survey engagement score 64% 56 staff, 54 FTE Percentage identifying as female 51.8%

#### Budget





#### Our key actions are

- Improve Member behaviour and/or perceptions of behaviour
- Hold Deputy Town Clerk Town Hall sessions to enhance the understanding of the vision and overall direction of the Senior Leadership Team
- Improve the way in which we communicate Learning & Development opportunities and prioritisation of time for learning
- Review and introduce measures to improve physical environment/Cross working at Deputy Town Clerk sites

## Equity, Equality, Diversity and Inclusion

- Greater compliance with PSED through committee reports
- Developing L&D sessions for Members that, for example, remove perceived barriers to those who may be interested in leadership positions
- Continuous improvement in the accessibility of public meetings and committee paperwork
- Training for crisis support volunteers encompasses humanitarian assistance training to understand the diversity and needs of those affected by major incidents
- Continuous improvement in the accessibility of meetings and paperwork.
- Improve PEEP (Personal Emergency & Evacuation Plans)
- Directly supporting the City Police's EDI ambitions, including through engagement with the Stephen Lawrence Day Foundation

Priorities and plans being considered in the medium term	2026/27	2027/28	Is this Funded or Unfunded?
Developing a City of London Policing Plan which maintains its relevance as the City itself evolves (including through its Destination City ambitions) and national government ambitions in relation to police reform become clearer	Y		Funded
Ensuring the Police Authority Board fully supports and enables the City Police to be a thought leader in relation to tackling fraud, economic and cyber-crime, and plays a key part in relation to the Corporation having a prominent national role in terms of economic security	Y	Y	Funded
Health & Safety Strategy	Υ		Funded
Automated Assurance of Risk Assessment	Y		Unfunded

Working with IT to develop and FAQs, which should reduce the Governance and Member Serv funded through IT	ance	Y	Funded		
Working with HR to develop a r training package for Governance Risks		eport writi	ing.	Y 8 Cofety	Unfunded
Risks Title	Score			& Safety	sk of stress in the workplace
Insufficient staff resource to maintain BAU whilst delivering the various workstreams Insufficient staff experience to deliver goals effectively		-	Ens		etion of DSE Assessments
CR01 – Resilience Risk	12				
CR09 – Health, Safety & Fire Risk Management system	12				
CR36 - Protective security	16				
TC DTC TCO 008 – Management of Public Meetings (C&MS)	6				
TC DTC PA 001 – Police Funding	12				
TC DTC PA 002 – Police Estates	12				
TC DTC PA 03 - Fraud and Cyber Crime Reporting & Analysis Service (FCCRAS) Procurement	24				
TC DTC PA 04 - Changes to Police Authority Governance	8				
TC DTC HS 001 - Corporate H&S Team professional competency	2				

Operational Property All operational properties have been assessed as utilised, part utilised, or not utilised, and confirmation has been provided to the City Surveyor's Department. **Yes** 

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<b>Committee(s):</b> Resources, Risks and Estates Committee (RREC) Police Authority Board (PAB)	Dates: 10/02/2025 12/01/2025
<b>Subject:</b> Revenue and Capital Monitoring Update – Q3 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 3 (Q3) (April to December) 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. As in the previous quarterly reporting, the forecast outturn at Q3 2024/25 remains a breakeven position, however, this hides several significant cost pressures and compensating mitigations which takes CoLP's 2024/25 revenue budget to the limits of affordability.
- 3. 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 resulting in a residual net cost pressure £1.2m having taken into account the 50/50 "risk share" with the Home Office, rephasing of the programme and additional overhead cost recovery from funded work agreed with the Home Office during the year. Other cost pressures include a core budget correction of £0.7m to in relation to funded activities and other operational cost pressures of £1.9m. 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.
- The outturn forecast assumes that this revenue cost pressure of £3.8m will be mitigated through the continuation of pay savings due to unplanned staff vacancies (£1.9m), additional revenue funding via a drawdown from a specific Action Fraud

reserve ( $\pounds$ 0.8m) and receipt of  $\pounds$ 1.2m from the Home Office in respect of the 24/25 officer pay award (**Slides 2-10**)

- 5. It should also be noted that any further changes to the delivery approach for the FCCRAS 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). Risks and opportunities at Q3 are detailed out in **slide 11** of the accompanying slide deck.
- 6. The Q3 forecast continues to assume 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.
- 7. In further support of the Q3 revenue monitoring position:
- Slide 13 provides a breakdown of overtime incurred to the end of Q3 by category, and highlights an indicative overspend of some £1m. However, it is expected that £0.6m of this will be recoverable from funded work and through Hotspot policing activities which is subject to additional Home Office funding in 24/25 (see slide 23-24). Overtime continues to be monitored at 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. The significant underspend reported in the Central Expenditure and Income business area is mainly due to the recognition of additional overhead recovery from funded work £3.5m, a Home Office pay award grant £1.2m and use of the Action Fraud Reserve £0.8m. As well as the release of provisions to manage officer and staff pay cost pressures.
- Slides 17-19 give an overview of historic receipts from the Asset Recovery Incentivisation Scheme (ARIS). A separate paper on ARIS funding is also on the agenda for this Committee. The slides also provide details of £2.7m of approved revenue / capital projects funded via the Proceeds of Crime Act (POCA) reserve in 2024/25.
- Slide 20 provides an update on the Force's reserves position which shows a forecast reduction in earmarked reserves of £3.5m by the end of the current financial year. This comprises a drawdown from the Proceeds of Crime Act (POCA) reserve of £2.7m 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 21-24 details the forecast outturn against the £1m Police Authority Board Team budget for 2024/25. Overall the Q3 outturn forecast is expected to an underspend of £190k. This is mainly due to an ongoing vacancy in the team and receipt of one off Home Office grant funding of £0.1m for administering the Serious Violence Duty. Slides 22-24 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, the forecast outturn is expected to be £0.87m, with the addition of three new initiatives: problem solving training, data visualisation/geo-spatial mapping and mobile CCTV cameras with the latter scheme is pending Home Office approval.

### CoLP Capital Programme:

- 8. Capital reporting has been developed to lead on the whole life costing for projects, which is showing an indicative £6.2m total increase on budgets (subject to governance and affordability assessment), which is mainly due to the increased costs of the FCCRAS project (£6m), two thirds of which will be funded by the Home Office.
- 9. For 2024/25 capital is forecast to be £12.297m (Q2: £13.362m), compared with total budget of £10.345m. which represents a net overspend of £1.952m. This is mainly due to rephasing of FCCRAS milestones payments of £4.517m from 2023/24 to 2024/25, because of programme rephasing (with Home Office capital contribution being fully utilised), partly offset by further reprofiling of retention payments of £1.500m into 2025/26. Therefore, the net overspend on FCCRAS in 2024/25 amounts to £3.017m. This has been partly offset by net underspends across other projects in 2024/25 of £1.703m including several national programmes, such as the Command and Control project, net of £0.638m spend being brought forward on other change priorities. Now that capital is largely funded by the £5m per annum revenue budget contribution, rather than the loan facility, an earmarked reserve will be used to smooth timing differences in spend between years.

### 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 estimated £12m contribution to FCCRAS capital spend following changes to the delivery approach.
- 11. In support of the Q3 capital monitoring position:
  - Slide 25 provides a capital programme summary

- Slides 26-27 provide a breakdown of CoLP capital projects underway and "whole life" phasing of expenditure across all years through to their completion;
- **Slides 28-30** provide notes on variations to budget;
- **Slides 31-32** provides a summary of the monitoring headlines at Q3 including a funding analysis
- Slides 33-34 provide a breakdown of the 2024/25 CoLP Capital Programme budget, compared to the latest outturn forecast at Q3 against each project; and
- Slide 35 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 Q3 and forecast outturn for 2024-25 as set out in this covering report and accompanying slide pack.

#### Appendices

2024/25 Q3 revenue and capital monitoring slide pack (of 35 slides as referred to in this covering report).

#### Contact

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



### **Revenue & Capital Summary**

#### **CoLP Revenue Outturn Summary**

Whilst a balanced outturn forecast has been maintained at Q3, 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 £10.6m (Q2: £9.7m), 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£15.3m and is reflected in the additional supplies and services expenditure shown in Table 1. The residual FCCRAS cost pressure on CoLP's budgets, after considering a 50:50 risk share arrangement with the Home Office and the application of additional overhead recovery, remains at £1.2m with the further extension cost pressures forecast at Q3 absorbed by vacancy savings due to the revised trajectory of staff recruitment into the FCCRAS programme. At this stage it is expected that this residual £1.2m cost pressure will be mitigated using a specific earmarked Action Fraud reserve (£0.8m) and core savings (£0.4m) without recourse to use of the General Reserve, however, this position will be kept under review should further pre<del>FG</del>ures arise from programme replanning.

Ke Variances at Q3 are explained in slides 3-8 with an accompanying "bridge" analysis of key variances on slide 9. Emerging risks and opportunities identified at Q3 (30 December 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 £6.2m total increase on budgets, largely linked to an estimated increase of £6m for the FCCRAS programme, two thirds of which will be funded by Home Office. For 2024/25 capital is forecast to be £12.3m (Q2:£13.4m), compared with the total budget of £10.3m, representing a net overspend of £2m. This is mainly due to rephasing of FCCRAS milestone payments between 2023/24 and 2024/25, partly offset by underspends across other projects net of some spend being brought forward on other change priorities. Now that capital is largely funded by the £5m pa revenue budget contribution rather than the loan facility, an earmarked reserve will be used to smooth timing differences in spend between years.

#### **Police Authority Board Outturn Summary**

The outturn for the Police Authority Team budget is £811k (Q1: £930k) against a latest approved budget of £1m, an underspend of £189k (Table 6 below refers), which is mainly due to an on-going vacancy in the PAB Team, unbudgeted government grant income and underspends on supplies and services budgets. Utilisation of the £1m 2024/25 Hotspot grant is also shown in Table 7, with current expenditure at the mid-year point totalling £402k. A re-forecast of expenditure has been submitted to the Home Office at the end of Q3 which includes three additional initiative to further amplify Hotspot activities and maximise utilisation of the available funding of up to £870k.



Table 1 2024/25 CoLP Revenue Budget	Budget YTD	Actual YTD	Variance to Date (Better) / + Worse	24/25 Full Year Budget	Projected Outturn	Projected Variance (Better) / + Worse	Notes
	£m	£m	£m	£m	£m	£m	
PAY							
Officers	60.0	58.2	(1.8)	80.0	77.9	(2.2)	(i)
Staff	31.6	25.9	(5.7)	42.2	36.9	(5.3)	(ii)
Overtime	2.2	3.0	0.8	2.9	3.9	1.0	(iii)
Agency	0.8	1.2	0.4	1.1	1.3	0.2	(iv)
Police Officer Pension	0.0	0.0	0.0	18.6	19.5	0.9	(V)
Indirect employee costs	2.2	1.5	(0.7)	2.9	2.7	(0.2)	(vi)
TOTAL PAY	96.8	89.9	(7.0)	147.7	142.1	(5.6)	
Q							
NON-PAY							
Premises Costs	3.2	2.3	(0.9)	4.2	4.5	0.2	(vii)
Transort	2.1	0.6	(1.5)	2.8	2.7	(0.1)	
Sup <b>stiles</b> and Services	26.3	36.6	10.3	35.1	50.8	15.7	(viii)
Third Party Payments	7.2	7.5	0.3	9.6	9.9	0.3	
Unidentified Saving	0.0	0.0	0.0	0.0	0.0	0.0	
CoL Support Services	2.3	0.1	(2.2)	3.4	3.4	0.0	
Capital Charges	5.7	0.0	(5.7)	5.0	5.1	0.1	
Transfer to Reserve	0.4	0.0	(0.4)	0.5	0.5	0.0	
TOTAL NON-PAY	47.2	47.1	(0.1)	60.7	77.0	16.2	
TOTAL EXPENDITURE	144.0	137.0	(7.0)	208.5	219.1	10.6	
INCOME							
Specific Grants	(54.5)	(28.7)		(72.9)	(84.1)	(11.2)	(ix)
Partnership	(12.1)	(8.7)		(14.7)	(14.3)	0.4	(x)
Fees & Charges	(2.4)	(1.0)		(4.7)	(4.0)	0.7	(xi)
Transfer from Reserves	(1.5)	(0.0)		(2.1)	(2.6)	(0.5)	(xii)
CoLP Core Funding	(73.5)	(73.5)		(114.1)	(114.1)	0.0	
TOTAL INCOME	(144.0)	(112.0)	32.1	(208.5)	(219.1)	(10.6)	
UNDERLYING DEFICIT	(0.0)	25.0	25.0	(0.0)	0.0	0.0	

#### (i) Police Officer Pay

The forecast for Police Officer pay is an underspend of £2.2m underspend (Q1: £0.7m underspend) against a latest approved budget of £80m. The variance, however, includes c£2.8m of savings due to vacancies across a range of funded activities which results in a corresponding reduction in government grant and partnership income. The outturn against the core officer budgets is therefore a £0.7m overspend, which is mainly due to the officer pay award exceeding the 3% budget assumption and the recruitment trajectory for officers shown in slide 10. As Members will recall 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 which will offset the core office pay overspend and provide a contribution to the 4% staff pay award.



<u>Home Office Uplift Grant Progress</u> - 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.

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 as supported by the Police Authority Board. The 24/25 forecast assumes there will be no in-year impact from this change.





#### (ii) Police Staff Pay

Police Staff pay, compared to a budget of £42.2m, is forecast to be underspent by £5.3m 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 10) indicate that the number of unplanned vacancies will continue for the remainder of this financial year. Of the £5.3m forecast underspend, c£3.4m relates to funded work where there are compensating reductions in income. The net core staff underspend is, therefore, c£1.9m. The 24/25 staff pay award has been agreed at 4%, compared to the 3% budgetary assumption. Whilst it is considered at this stage that, with savings due to the recruitment intake of staff running behind plan, this can be contained within existing 24/25 budgets, the full year impact of a 1% increase is c£420k which affect downstream affordability.

#### യ (iiigOvertime

Officer overtime is forecast to be £1.0m overspent (£0.4m overspend in Q2) against the original budget of £2.9m. The increase from Q1 is **loo**gely due to policing on special one-off events/protest activities such as Op Navette, Op Mayfield, Extinction Rebellion, the backfilling of vacancies in specialist commands such as the Tactical Firearms Team and the resourcing of Hotspot activities (Slide 22) through overtime. Of the £1.1m overspend it is expected that c£800k will be recovered through additional government grant income, mutual aid and/or funded work. Overtime is subject to local controls and review at the Force's Strategic Finance Board.

#### (iv) Agency

Agency costs are forecast to be £0.2m over budget, however, it is expected to that this overspend will be recovered through funded work.





# **Revenue Monitoring Supporting Information**

#### (v & x) Pension Deficit Grant

Employer contributions into the Police Officer Pension Scheme increased by 4.3%, rising from 31% to 35.3% on 1 April 2024. 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.

#### (vii) 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 £15.7m 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 net £0.2m overspend on premises budget due to increased energy and utility costs, however, there is a risk that this overspend Thay increase by £0.4m following a review and re-forecast of the cost of repair and maintenance works across the estate (vii).
- 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.
- A £15.7m overspend is forecast on Supplies and Services budgets (viii) which is mainly due to:
  - extending existing service contracts by rephasing FCCRAS "go-live", £15.3m,
  - 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.

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 the Q3 forecast recognises the programme is in



replanning stage and any cost increases above this forecast will require a separate funding strategy.

#### (ix) Specific Government Grants

The forecast Government Grant outturn is an over achievement of £11.2m against the original budget of £72.6m (£103.2m less £30.6m of Cyber Grant payments to other forces). This is due to £11.7m of additional anticipated funding for the FCCRAS programme, a £1.2m Home Office pay award grant, £0.9m of pension deficit funding and additional £0.2m of secondment income. This total additional income of £14.0m is netted down by a £2.6m shortfall in recovery against grants for funded activities due to reductions in programme funding and recruitment delays. These include funding for Fraud Reform (£0.9m), Fraud Legacy (£0.7m), Proactive Economic Crime Grant (£0.3m) and Anti-Money Laundering Act Regulations (£0.7m) funding. This reduction in government grant income is matched by reductions in expenditure across pay and non-pay headings.

#### (x) Partnership Income

Artnership income is forecast to under-recover by £0.4m against an original budget of £14.3m. This is mainly due to an overestimation 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 £0.7m. This is principally due to lower than anticipated receipts from the Economic Crime Academy and lower than budgeted salary recharges to capital projects. This reduction in income is matched by a corresponding decrease in operating costs and will be fully updated for 25/26.





#### (xii) Use of Reserves

The use of Reserves is forecast to increase by £0.7m from £2.0 to £2.6m This is mainly due to a £0.775m drawdown from a specific 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 £2.6m drawdown from the POCA reserves (Table 5) is a £881k contribution towards the cost of the 2024/25 capital programme.

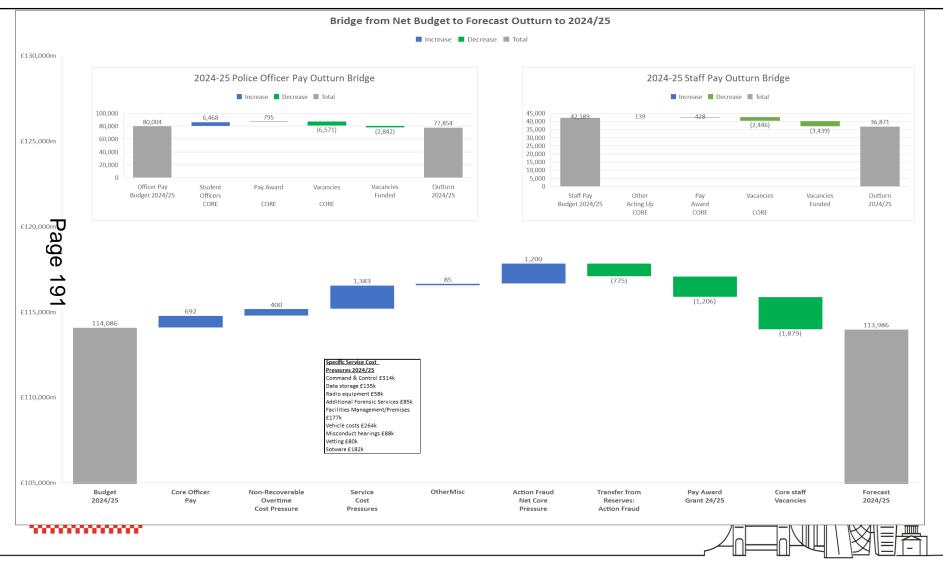
#### 2024/25 Mitigations

 24/25 CoLP was required to deliver £15.5m of mitigations to deliver a balanced budget. Of this some £8.5m related to Oncreases in national (core grant £5.9m) and local (Business Rates Premium (BRP) £2.6m) funding which were realised. Of the Onemaining £7m, current forecasts suggest an over-achievement of £3.0m which is mainly due to better overhead recovery from -funded work than anticipated in the 24/25 budget. This position remains unchanged from Q2.

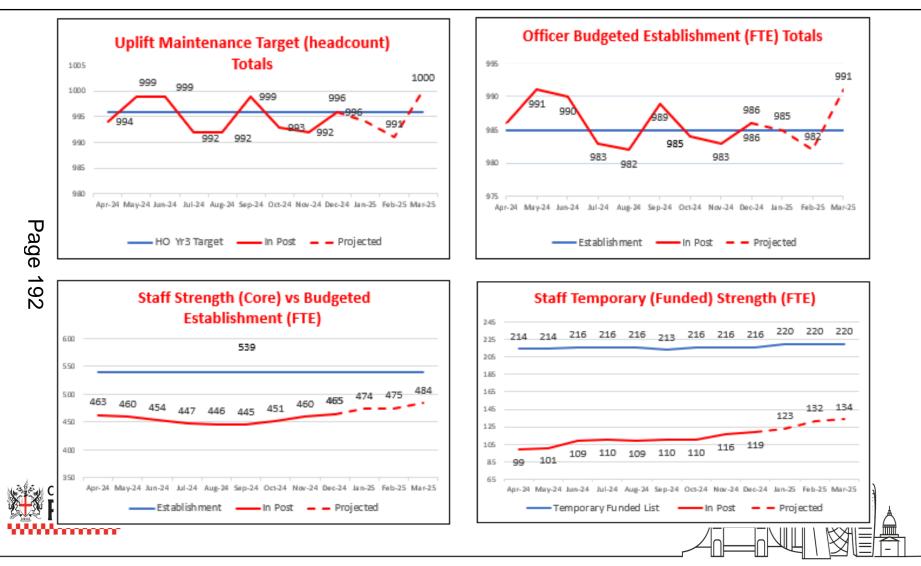




### **Revenue Monitoring Bridge Analysis**



### Workforce Dashboard



### **Risks and Opportunities**

There are several financial risks and opportunities outside of the Q3 monitoring period (1 April – 31 December 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. •
- 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. ٠
- Further unidentified operational pressures which could lead to an increase in overtime and other costs. •
- Further premises cost pressures arising from a re-forecasting of repairs and maintenance costs.
- Risk of failure to deliver / sustain mitigations

- $\overline{\mathbf{O}}$  Unplanned staff vacancies due to a lower-than-expected staff recruitment outcomes.
- •ω 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. ٠
- Early work on productivity review may identify early opportunities to at least better absorb operational and other demand • pressures.





### **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:

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)	0.0		(i)
Higher proportion of more junior PCs	0.8	0.4	(0.4)	0.0		(ii)
Intreased recharging of costs to funded activities and change	3.1	6.6	3.5	3.1		(iii)
Ren-pay savings: professional fees, release of inflationary provision & other	1.8	1.8	0.0	1.8		(iv)
Rejustment for phasing of staff recruitment to full establishment	0.8	0.8	0.0	0.0		(v)
A Total	7.0	9.6	2.6	4.9		

#### Notes

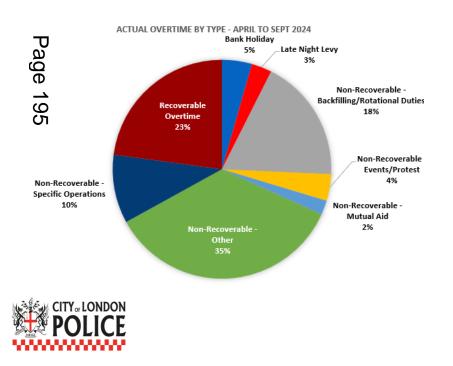
- Action Fraud unrealised saving due to revised delivery implantation plan for the FCCRAS programme. (i)
- More Junior PCs The Officer Uplift Programme resulted in a higher number of more junior PCs than in the Force's operational model. Whist (ii) this provides a second year of savings in 24/25 with 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 be 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).



### **Overtime Analysis**

Police Officer and Staff overtime outturn forecast is estimated to be £3.9m against a budget of £2.9m resulting in an overspend of £1.0m (Q2: £0.4m overspend). Of the £2.9m expenditure to date, £671k relates to recoverable activities such as the Funded Units, mutual aid and Hotspot activities for which CoLP expects to be fully reimbursed. There is, however, remain pressures in Taskforce (backfilling), intelligence, Investigation (major crime operation and re-active response) and Custody which is driving increased non-recoverable overtime. The outturn forecast is also impacted by the officer and staff pay award which have increased overtime rates.

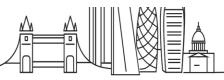
A summary of overtime to the end of Q3 incurred by category is shown below.



Overtime Category	£'000
Bank Holiday	130
Late Night Levy	88
Non-Recoverable - Backfilling	537
Non-Recoverable - Events/Protest	116
Non-Recoverable - Mutual Aid	62
Non-Recoverable - Other	1,033
Non-Recoverable - Specific Operations	298
Recoverable Overtime	671
Total Overtime Q3 (April to December 2024)	2,934

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.



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

Table 3 Business Area Summaries	Budget YTD	Actuals YTD	Variance YTD (Better)/ +Worse	Full Year Budget	Projected Full Year Outturn	Variance (Under)/ +Over	Notes (on slides 15 to 16
	£'000	£'000	£'000	£'000	£'000	£'000	(1)
Local Policing	23,785	25,813	2,209	31,713	35,621	3,908	(i)
Specialist Operations	21,914	23,677	1,763	29,218	24,416	(802)	(ii)
National Lead Force	5,804	35,314	29,510	7,738	11,617	3,879	(iii)
Corporate Services	24,422	26,858	2,435	32,563	33,104	541	(iv)
Antral Expenditure & Income	(4,310)	(13,147)	(8,838)	12,854	5,329	(7,525)	(v)
Ret Expenditure	71,615	98,515	26,900	114,086	114,086	-	

**Example 1 Policing: £3.9m overspend (Q2 £4.7m overspend)**. This is mainly due to a high number of Student Officers (126) being attached to **Example 1** 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 £6.3m of which £3.7m 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 of 4.75% was 1.75% higher than budgeted assumptions and has increased officer pay costs by £0.3m, leaving a residual net pay pressure of £2.8m; although £0.3m of this will be off-set by a Home Office Pay Award Grant. Overtime is predicted to be overspent by £0.6m an increase of £0.2m from Q2. This is due to the learning curve of student officers, backfilling specialist roles, the policing events and Hotspot activities. 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, due to the policing requirements in a national and international capital city there remains a risk that the expected overtime variance could increase significantly should an unexpected event occur. As in 23/24 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.

### Business Area Summaries [2 of 3]

(ii) Specialist Operations (SO): £0.8m underspend (Q2: £0.8m underspend). Combined Officer, Staff and Overtime pay costs are forecast to be underspent 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. Included within the Q3 forecast for SO is an overtime cost pressure of £0.7m, which is mainly due to operation related work and reactive crime. Overtime remains a significant risk and is developed each quarter in parallel with the senior leadership team. Savings are forecast to be achieved in supplies and services budgets mainly due to lower delays in Cyber Griffin growth (£178k) and underspend against a Drug Testing on Arrest (DTOA) budgets due to a reduction in funding of £90k. These savings of £268k are largely offset by an increase of £65k in forensic services costs due to increased investigatory work, unbudgeted digital forensic storage costs £135k and unforeseen equipment repair costs of £40k. Third party payments are also forecast to be overspent by £55k, due to increased demands for forensic analysis services. An under recovery of £555k in Government Grants, is also expected due to a delay in recruitment to vacant funded roles. Other income is forecast to be overachieved by £221k due to Op Safeguard, TfL Special Services funding and mutual aid recoveries from other police forces, net of a £66k shortfall against forecast customer client receipts, mainly due to the loss of DTOA 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 £978k mainly due to vacancies.

**Wational Lead Force: £3.9m overspend (Q2: £1.7m overspend).** The forecast outturn for National Lead Force activities in 24/25 is £11.6m compared to a latest budget of £7.7m resulting in a net overspend of £3.9m. This is mainly due to additional Fraud and Cyber Crime Reporting and Analysis Service (FCCRAS) of £4.6m consequent of the revised delivery plan and a £0.6m budgetary under provision in respect of CoLP's core contribution to the Insurance Fraud Enforcement Department (IFED) which has been corrected through the forecast. These cost pressures have been offset by £1.2m of core savings, including £1.0m pay savings due to recruitment delays and £0.25m of additional unplanned income. Of the £4.6m FCCRAS cost pressure, £3.5m will be off set from additional overhead cost recovery which has been agreed with the Home Office. The additional overhead recovery recognises the inflationary impact of historic cash flat national funding agreements and the impact of national activities on CoLP's headquarter operating costs. This additional income is reflected in the outturn for the Central Expenditure and Income Business Area (see slide 16). This leaves a residual FCCRAS cost pressure of £1.2m which will be funded via use of an earmarked Action Fraud reserve (£0.8m) and through wider core savings and/or a call on the Force's General Reserve.





(iv) Corporate Services: £0.5m overspend (Q2: £0.8m underspend). Police Officer Pay is forecast to be underspent by £1.0m 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 £1.4m 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 £2.6m are partially offset by additional agency worker costs of £0.6m to backfill vacancies. An overspend against premises budgets of £0.2m due to increased energy and utility costs of £0.8m net of a potential £0.6m underspend against repairs and maintenance budgets. The repairs and maintenance underspend is being investigated and may result in a further cost pressure at outturn. Supplies and services and other non-pay budgets are forecast to be overspent by £0.8m. Of ther cost pressures arising from legals associated with misconduct hearings, additional vetting charges and other professional fees. Income from government grants, other contributions, fees and charges and recharges to capital projects are expected to be under recovered against budget by £1.5m all of which are due to vacancies and lower than expected employee costs.

(v) Central Expenditure & Income (CE&I): £7.5m underspend (Q1: £4.7m 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 provisions 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. 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. A £0.8m transfer from Reserves is shown in this business area to partially mitigate the Action Fraud contract extension costs, along with £1.2m of Government grant income relating to the national police pay award and £3.5m of additional overhead cost recovery from funded work.

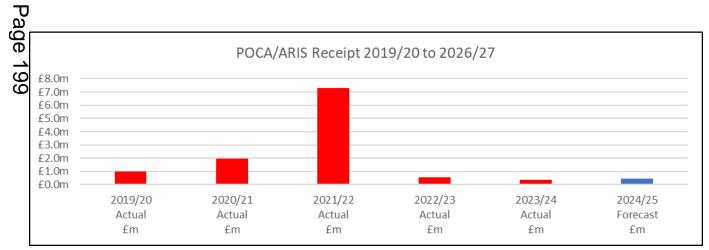




# Proceeds of Crime Act (POCA)/ Asset Recovery Incentivisation Scheme (ARIS)

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. An assessment of pipeline activity by the Asset Recovery Team is subject to a separate report to this Committee in the non-public part of the agenda .





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

# Proceeds of Crime Act Funded Expenditure [Slide 1 of 2]

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 £1.8m of revenue and £0.9m 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 POCA Funded Expenditure	Full Year Budget £'000	Projected Full Year Outturn £'000	Variance (Under)/ +Over £'000	Notes (on slide 19)
Safer City Partnership	50.0	50.0	-	(i)
Cyber Resilience Outreach Project (New)	10.0	10.0	-	(ii)
Fr <u>au</u> d Forum Event (New)	0.0	15.0	15.0	(iii)
Togal Community Projects	60.0	75.0	15.0	
A See t Recovery Team	1,300.0	1,300.0	-	(iv)
Civil Recovery Team	300.0	300.0	-	(v)
Total Asset Recovery	1,600.0	1,600.0	-	
Operation Creative	35.0	35.0	-	
NBCC Communications & Marketing	10.0	0.0	(10.0)	(vi)
Covert Tasking	60.0	5.0	(55.0)	(vii)
Economic & Cyber Police HQ Communications Support (New)	144.0	4.0	(140.0)	(viii)
Total Crime Reduction	105.0	44.0	(205.0)	
NLF People Strategy	93.0	0.0	(93.0)	(ix)
Total Miscellaneous	93.0	0.0	(93.0)	
TOTAL REVENUE FUNDING	2,002	1,719.0	(283)	
Auto-Redaction (New)	-	99.0	99.0	(x)
Out of Court Resolutions (New)	-	148.0	148.0	(xii)
Data Analytics	645.0	634.0	(11.0)	(xiii)
TOTAL CAPITAL FUNDING	645.0	881.0	236.0	
GRAND TOTAL	2,647.0	2,600.0	(47.0)	

#### 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, £175k has been approved, now phased over 5 years .
- vii Overtime/Tasking budget to support covert operations.
- i Funding to engage a temporary communications resource (18 months) to support CoLP's national economic and cybercrime
- capabilities. A total budget of £144k was agreed in 24/25, however, due to recruitment delays the majority of this spend will take
   place in FY 25-26 & FY 26-27.
- x. NLF People Strategy Project designed to implement initiatives to improve recruitment and retention of staff within economic crime across the UK. This has now been funded via other national grant streams.
- xi. Project to introduce an auto-redaction tool (nationally developed) to drive efficiencies and reduce failure demand.
- xii. Out of Court Resolutions Project to identify and implement a data platform solution to increase the speed of justice delivery, achieve correct and proportionate outcomes in line with meet new legislative requirements.
- xiii. Data Analytics 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.





Police Reserves are set out in Table 5 below:

Based on the Q3 position, it is expected that Reserves will reduce by £2.9m from an opening balance of £13.6m to £10.7m. 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 Reserves	Opening Balance 2024/25	Forecast Transfers to Reserve	Forecast Transfer from Reserves	Closing Balance 2024/25
20	£'000	£'000	£'000	£'000
General Reserve	6,595	-	-	6,595
Specific Reserves:				
Proceeds of Crime Act	5,946	500	(2,600)	3,846
Action Fraud Reserve	775	-	(775)	-
Emergency Services Mobile Technology	294	-	-	294
Total Specific Reserves	7,015	500	(3,375)	4,140
Total	13,610	500	(3,375)	10,735





### Police Authority Team Revenue Budget

The total Police Authority Team budget for 2024/25 is a net expenditure position of £1m as shown in table 6 below. The outturn for 24/25 is expected to be £810.5k, which is an underspend of £189.5k compared to budget. This variance is mainly due to a staff vacancy (£40.3k) and the receipt of temporary Home Office grant funding for administering the Serious Violence Duty. The variance in supplies and services expenditure (note ii) is mainly due to a reallocation of the budget in the forecast to provide for CoL support services costs (note iv), along with an anticipated underspend against the 24/25 provision for misconduct hearing expenses.

The variance in third party payment and Government grants (notes iii & v) mainly relates to a) the timing of payments to and from the PAB budget in respect of the Home Office Safer Streets Fund Initiative under which the City is partly a conduit for grant funding for other London Boroughs, which will be equalised by year end, and b) a projected underspend of £131.5k against the £1m and Hotspot funding which was allocated to Police and Crime Commissioners in 24/25 to tackle serious violence and anti-social behaviour (see slide 22).

Budget YTD £'000	Actuals YTD £'000	Variance YTD (Better)/ +Worse £'000	Full Year Budget £'000	Projected Full Year Outturn £'000	Variance Full Year (Better)/ +Worse £'000	Notes
523.5	483.3	(40.2)	698.0	657.7	(40.3)	(i)
11.3	3.1	(8.2)	15.0	7.0	(8.0)	
534.8	486.4	(48.4)	713.0	664.7	(48.3)	
1.5	-	(1.5)	2.0	1.4	(0.6)	
213.8	118.3	(95.5)	285.0	141.0	(114.0)	(ii)
750.0	499.0	499.0	1,000	1,326.5	326.5	(iii)
-	-	-	-	72.0	72.0	(iv)
215.3	617.3	402.1	287.0	1,540.9	1,253.9	
750.0	1,103.7	353.7	1,000.0	2,205.6	1,205.6	
(750.0)	(753.4)	(735.4)	(1,000.0)	(1,395.1)	(395.1)	(v)
-	(753.4)	(735.4)	-	(1,395.1)	(395.1)	
750.0	350.3	(399.7)	1,000.0	810.5	(189.5)	
	£'000         523.5         11.3         534.8         1.5         213.8         750.0         215.3         750.0         (750.0)         (750.0)	£'000         £'000           523.5         483.3           11.3         3.1           534.8         486.4           1.5         -           213.8         118.3           750.0         499.0           -         -           215.3         617.3           750.0         1,103.7           (750.0)         (753.4)           -         (753.4)	£'000         £'000         £'000           £'000         £'000         £'000           523.5         483.3         (40.2)           11.3         3.1         (8.2)           534.8         486.4         (48.4)           1.5         -         (1.5)           213.8         118.3         (95.5)           750.0         499.0         499.0           -         -         -           215.3         617.3         402.1           750.0         1,103.7         353.7           (750.0)         (753.4)         (735.4)           -         -         (735.4)	É'000         É'000         É'000         É'000         É'000           523.5         483.3         (40.2)         698.0           11.3         3.1         (8.2)         15.0           534.8         486.4         (48.4)         713.0           1.5         -         (1.5)         2.0           213.8         118.3         (95.5)         285.0           750.0         499.0         499.0         1,000           -         -         -         -           215.3         617.3         402.1         287.0           750.0         1,103.7         353.7         1,000.0           (750.0)         (753.4)         (735.4)         (1,000.0)	Line         (Better)/ +Worse         Outturn           É'000         É'000         É'000         É'000         É'000         É'000           523.5         483.3         (40.2)         698.0         657.7           11.3         3.1         (8.2)         15.0         7.0           534.8         486.4         (48.4)         713.0         664.7           1.5         -         (1.5)         2.0         1.4           213.8         118.3         (95.5)         285.0         141.0           750.0         499.0         499.0         1,000         1,326.5           -         -         -         72.0         72.0           215.3         617.3         402.1         287.0         1,540.9           750.0         1,103.7         353.7         1,000.0         2,205.6           (750.0)         (753.4)         (735.4)         (1,000.0)         (1,395.1)           -         -         (753.4)         (735.4)         -         (1,395.1)	Line         Line         Line         Line         Outturn         (Better)/ +Worse £'000         Outturn         (Better)/ +Worse £'000           É'000         É'000         É'000         É'000         É'000         É'000           É'011         S23.5         483.3         (40.2)         698.0         657.7         (40.3)           11.3         3.1         (8.2)         15.0         7.0         (8.0)           534.8         486.4         (48.4)         713.0         664.7         (48.3)           1.5         -         (1.5)         2.0         1.4         (0.6)           213.8         118.3         (95.5)         285.0         141.0         (114.0)           750.0         499.0         499.0         1,000         1,326.5         326.5           750.0         499.0         499.0         1,000         1,326.5         326.5           750.0         1,103.7         353.7         1,000.0         2,205.6         1,205.6           750.0         1,103.7         353.7         1,000.0         (1,395.1)         (395.1)           750.0         (753.4)         (735.4)         (1,000.0)         (1,395.1)         (395.1)

#### **Hotspot Progress Update**

This financial year the City has been allocated £1m Home Office grant funding for visible hotspot policing initiatives tackling serious violence and ASB (the 'GRIP' programme). Members of RREC at the November 2024 meeting requested assurance that the use of this funding is being maximised. Table 7 on page 23 provides a programme summary of expenditure to the end of Q3 and forecast outturn.

When considering the expenditure to date and forecast outturn there are three important points to note.

First, most police force areas received a flat £1m allocation irrespective of size – for the City, this is a large allocation and it was always going to be challenging to increase officer overtime (the main spend component) to expend the full £1m in one year with very limited lead-in times. Home Office have confirmed that we are not an outlier in this respect and some other (larger) forces have spent less of their allocation.

Second, there have been unanticipated constraints – officer abstraction to public order and protest duties over spring and summer delayed the large (£250k) Op Vigilant initiative, and officer uptake of overtime has in areas (notably DWOs) been less than anticipated, including due to precedence of Christmas campaign overtime. Op Vigilant (now re-cast as 'Servator VAWG') is now up-and-running and additional efforts are underway to maximise overtime for the remainder of the financial year. It should be noted that, despite the above, total patrol hours are significantly above Home Office targets.

Third, we have agreed the repurposing of £186k underspend to new initiatives (problem-solving training and new geo-spatial mapping tools) and are awaiting Home Office confirmation of a further £59k re-purposing to provide additional temporary CCTV cameras. As such, we are making effective use of underspends, for initiatives that will deliver permanent benefits beyond this financial year.





Considering the initial eight Hotspot initiative and proposed new proposals set out in slide 22, Table 7 below, sets out total expenditure to the end of Q3 2024/25 and outturn forecast. Expenditure to date totals £403.5k, with an expected outturn forecast of £870.3k, representing an under spend of £129.7k (13%).

Table 7 Hotspot Funded Initiative	Budget YTD	Actuals YTD	Variance YTD (Better)/ +Worse	Full Year Budget	Projected Full Year Outturn	Variance (Under)/ +Over	Notes (on slides 23- 24)
σ	£'000	£'000	£'000	£'000	£'000	<b>£'000</b>	
A Hytical Staff	78.0	51.6	(26.4)	104.0	104.0	-	(i)
Deplicated Ward Officers	27.0	9.5	(17.5)	36.0	38.3	2.3	(ii)
Appuisitive Crime Teams	104.3	121.4	17.2	139.0	161.7	22.7	(iii)
Cype Teams	84.0	35.3	(48.7)	112.0	47.0	(65.0)	(iv)
Bridge Crime	135.0	144.8	9.8	180.0	180.0	-	(v)
Operation Vigilant	184.5	28.6	(155.9)	246.0	58.6	(187.4)	(vi)
Taxi & Compliance Checks	23.3	8.2	(15.1)	31.0	14.2	(16.8)	(vii)
CCTV Monitoring	114.0	4.1	(109.9)	152.0	22.0	(130.0)	(viii)
Problem Solving Training (New)	-	-	-	-	134.5	134.4	(ix)
Data Visualisation & Geo-spatial Mapping (New)	-	-	-	-	51.4	51.4	(x)
Mobile CCTV Cameras (New provisional)	-	-	-	-	58.6	58.6	(xi)
	750.0	403.5	(346.5)	1,000.0	870.3	(129.7)	





23

# Hotspot Funding [Slide 3 of 3]

#### 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 continue in Q4
- iii. Acquisitive Crime teams £139,000 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 continue in Q4.
- iv. Cycle Team £112,000 of funding for the increased deployment of the Cycle Team to tackle robbery, theft, and ASB. The current forecast under delivery against planned deployments (£65k) has been due to officer abstractions of officers from the Cycle Team to meet other policing priorities.
- v.  $\nabla$ '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.<sup>O</sup> £246,000 for **Operation Vigilant** training officers to prevent sexual violence in the night-time economy (NTE) and significantly increasing
- B 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. Training for a cohort of officers took place October 2024, which has enabled Vigilant deployments in November and December.
- 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.
- 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-Q3 has restricted activity against this initiative.
- ix. NEW £134,400 for Training funding to embed problem-orientated and Hotspots policing to maximise outcomes.
- x. NEW £51,300 for **Data Visualisation and Geospatial Mapping** to enhance operational decision making.
- xi. NEW £58,600 for Mobile CCTV Cameras (provisional). Progression of this bid is subject to further consideration by CoLP.





#### **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.
- 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 26 to 30 set out the Whole Life Capital costs by project, which shows an indicative £6.2m total increase on budgets (subject to governance and affordability assessments), this is mainly due to estimated increased costs of the FCCRAS project (£6.0m) based on the development of a new programme plan.
- Slides 31 to 34 set out the in-year 24/25 forecasts for approved projects.
- Slide 35 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



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

Prior to presenting the 2024/25 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 £45.900m, representing an overspend of £6.165m (15.5%). This is largely due to estimated increased costs of the FCCRAS project (£5.5m) based on the development of a new programme plan, the Command and Control project (£481k) and E-discovery project (574k).

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 28-30)
FCCRAS	31,038	21,758	7,780	7,500	-	-	37,038	6,000	(a)
Cyplical replacement	1,600	-	1,200	431	-	-	1,631	31	(b)
- Firearms	400	-	400	-	-	-	400	-	(c )
-NHorsebox	400	-	400	-	-	-	400	-	(d)
- Reet replacement	817	-	358	459	-	-	817	-	(e)
Command and Control	707	-	113	623	329	123	1,188	481	(f)
Data Analytics (formerly Power BI)	748	98	634	50	-	-	782	34	(g)
ICAV	248	195	15	50	-	-	260	12	
Prioritisation and feasibility funding	776	173	227	-	-	-	400	(376)	(h)
E-discovery	500	-	158	916	-	-	1.074	574	(i)
Body Worn Video	309	217	7	-	-	-	224	(85)	
Covert Camera System	106	46	65	-	-	-	111	5	
Covert Surveillance Equipment	247	152	91	-	-	-	243	(4)	
Multi Agency Public Protection System	148	-	15	133	-	-	148	-	(k)
Sub-total (continued next slide)	38,044	22,639	11,463	10,162	329	123	44,216	6,172	
CITY CONTINUED NEXT SIDE									

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 28-30)
Sub-total (continued from previous slide)	38,044	22,639	11,463	10,162	329	123	44,216	6,172	
Out of Court Resolutions (OoCR)	163	-	148	-	-	-	148	(15)	
Digital Asset Management System	60	-	4	56	-	-	60	-	(m)
Forensic Case & Quality Management	500	-	22	478	-	-	500	-	(j)
Rele-based Access	77	-	2	75	21	-	98	21	(I)
I Image Management System I Image Management System	59	-	59	3	-	-	62	3	(p)
Auto-Redaction (POCA) (PILOT)	99	-	99	-	-	-	99	-	(q)
Supplementary Revenue Projects	119	-	109	63	72	82	326	207	(o)
Revenue funding from £5m DRF	223	-	-			-	-	(223)	(r)
Uncommitted	391	-	391	-	-	-	391	-	(n)
TOTAL COST OF PROJECTS UNDERWAY	39,735	22,639	12,297	10,837	422	205	45,900	6,165	



# CoLP Capital Programme [notes, slide 1 of 3]

#### Notes to tables 8 and 11:

- a) FCCRAS: Based on the development of a new programme plan, the total project cost is estimated to increase by £6.0m to £37.0m, with the increase expected to be incurred in 2025/26 and funded jointly by Home Office (£3.667m) and CoLP (£1.833m). The forecast overspend against budget in the current year 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, 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 in 2024/25.
- b) IT device (laptops) refresh: Approval has been given and the rollout commenced 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 6<sup>th</sup> August. A report owill be submitted to Strategic Finance Board in due course with the outcome of this evaluation work and a final cost estimate for approval. During February testing will be carried on the new equipment will full delivery expect either at the end of March or early April
- 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. 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. It is anticipated that the full budget will be committed by the end of March25
- f) Command and Control: Compared to a budget in 2024/25 of £707k, latest forecast spend is £113k due to the delay in the MPS reset. The whole life project costs are still to be confirmed and remain indicative until additional work has been completed on potential options selection.

# 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 £684k will take place in 2024/25 and 2025/26, which would be £34k 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, £227k is forecast to be spent in the 2024/25.
- i) E-discovery: based on current estimates there is a risk of project overspend of £0.574m. However, this will be reviewed subject to procurement options and solutions being identified.
- j)-Forensic Case and Quality Management System: early scoping is taking place in 2024/25, with most spend now likely in 2025/26.

R Multi Agency Public Protection System: a delayed national project with most spend expected in 2025/26.

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: due to resourcing pressures and reprioritisation, anticipated to start later in 2024/25, with most spend slipping to 2025/26.
- n) Underspends: the 24/25 forecast outturn net overspend of £1.952m comprises the FCCRAS overspend of £3.017m, a net underspend against other projects of £1.703m in 2024/25, of which £0.638m of that net underspend is forecast to be utilised on projects originally prioritised for future years. 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, including continuous improvement in process efficiencies in business areas such as vetting, HR and Duty Planning.





# 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) budget £24k reprogrammed from 24/25 to 25/26 and 26/27.
- Digital Investigation and Intelligence (national) budget £14k reprogrammed from 24/25 into 26/27 and 27/28
- Digital Case File (national) budget **£12k** reprogrammed from 24/25 to 26/27 with total cost expected to increase to circa £57k. However, these costs are indicative estimates at this stage with the project being a national one.
- Joint ERP System (local) budget **£10k** now expected to complete in 26/27 with a forecast total cost of £35k, the increase due to now having a better understanding of the additional CoLP resource requirements from the Corporations' Programme Team
- Tackling Organised Exploitation Programme (TOEX) (National) budget **£7k** delayed in 24/25, moved into 25/26
- Rape Response Review (national) budget **£1k** 24/25, cost expected to increase to £16k to cover license costs.

### Cotal budget £68k

### Rew Supplementary Revenue projects include:

- Electronic Display Screen Equipment Management System (EDSEMS) (local) Legislative compliance budget £34k 24/25, forecast project outturn £47k
- Travel System (AGITO) (local) value for money, improved financial monitoring budget **£9k** 24/25, forecast total cost £25k.
- Operation Soteria (national) national response to violence against women and girls budget £8k 24/25 and forecast for 24/25 of £37k.

#### Total budget £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. At Q2 £223k had been reprioritised to help mitigate in year revenue cost pressure, however at Q3 it is forecast that this is no longer required.

# Capital Monitoring 2024/25 (Q3 to 31 December 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 £12.297m, which represents a net overspend of £1.952m. This is mainly 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 £1.500m into 2025/26. Therefore, the net overspend on FCCRAS in 2024/25 amounts to £3.017m. This has been partly offset by net underspends across other projects in 2024/25 of £1.703m, less £0.638m of those underspends which are forecast to be utilised in 2024/25 by bringing forward projects programmed for future years, subject to approvals.

Table 9 - CoLP Capital Programme 2024/25	2024/25 Budget £'000	2024/25 Forecast Outturn £'000	2024/25 Variance: Budget vs Forecast Outturn £'000
Total CoLP Capital Programme 2024/25	10,345	12,297	1,952

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	12,297	3,612	2,804	5,000	881

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 estimated £12m contribution to FCCRAS capital spend. Accrued borrowing as at 1 April 2024 was £1.9m and is forecast to increase to between £3.5m and £4.5m by 31 March 2025 depending on the timing of the Home Office contribution to increased FCCRAS capital.





# Capital Monitoring 2024/25 (Q3 to 31 December 2024) Headlines [2 of 2]

The 2024/25 capital programme (summarised in table 9 on slide 31), is broken down across individual projects in table 11 on slides 33 and 34.

Slide 35 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 £12.297m, which represents an overspend of £1.952m. This is mainly 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 £1.500m into 2025/26. Therefore, the net overspend on FCCRAS in 2024/25 amounts to £3.017m. This has been partly offset by net underspends across other projects in 2024/25 of £1.703m, less £0.638m of those underspends which are forecast to be utilised in 2024/25 by bringing forward projects programmed for future years, subject to approvals.

The 2024/25 net underspend across projects (excluding FCCRAS) of £1.703m is mainly due to the delay in the Command and Control project (£0.594m), the provision for prioritisation and feasibility work not being fully required £0.378m) and reprogramming of the Forensic Case and Quality Management System (£0.194m), the E-Discovery project (£0.134m) and the Muli Agency Public Protection System (£0.133m) to 2025/26. Further explanation of the projects and variations to budget is provided in the notes on slides 28 to 30.

Table 11 - CoLP Capital Programme 2024/25	2024/25 Budget £'000	2024/25 Forecast Outturn £'000	2024/25 Variance: Bud. v Forecast Outturn £'000	Notes on slides 28 to 30
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	113	(594)	(f)
Data Analytics Platform (formerly Power BI)	645	634	(11)	(g)
Prioritisation and feasibility funding	605	227	(378)	(h)
E-Discovery	292	158	(134)	(i)
Forensic Case & Quality Management System	216	22	(194)	(j)
Out of Court Resolutions	163	148	(15)	
Sub-total (continued next slide)	9,749	11,440	1,691	

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

Table 11 - CoLP Capital Programme 2024/25	2024/25 Budget £'000	2024/25 Forecast Outturn £'000	2024/25 Variance: Bud. v Forecast Outturn £'000	Notes on slides 28 to 30
Sub-total (continued from previous slide)	9,749	11,440	1,691	
Multi Agency Public Protection System	148	15	(133)	(k)
Court Surveillance Equipment	91	91	0	
Body Worn Video	79	7	(72)	
Role Based Access	77	2	(75)	(I)
🕡 vert Camera System	63	65	2	
😤 igital Asset Management System	60	4	(56)	(m)
<b>W</b> AV	10	15	5	
Other Supplementary Revenue Projects	68	20	(48)	(o)
知b-total (prior to new proposals)	10,345	11,659	1,314	
New proposals to utilise slippage:				(n)
1. Forensic Image Management System (FIMS)	0	59	59	(p)
2. Auto Redaction (Pilot)	0	99	99	(q)
Other New Supplementary Revenue Projects	0	89	89	(o)
Contribution to revenue funding shortfall from £5m DRF	0	0	0	(r)
Uncommitted	0	391	391	(n)
Sub-total (new proposals)	0	638	638	(n)
Total CoLP Capital Programme 2024/25	10,345	12,297	1,952	





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
- Euture Network Strategy





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# Agenda Item 14

# **City of London Corporation Committee Report**

Committee(s):	Dated:
Economic and Cyber Crime Committee – for information	4 February 2025
Police Authority Board – for information	12 February 2025
Subject:	Public
•	FUDIIC
National Lead Force Performance Pack	
Does this proposal require extra revenue and/or	No
capital spending?	
If so, how much?	N/A
What is the source of Funding?	NI/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the	N/A
Chamberlain's Department?	
Report of:	Commissioner of Police
Report author:	Lucy Cumming

# Summary

This report is the most recent National Lead Force (NLF) Performance Pack that is produced quarterly and presented to the ECCC.

The performance pack reflects the objectives and measures set within the National Policing Strategy for Fraud, Economic and Cyber Crime and includes national performance in the areas that City of London Police, under NLF functions, lead and co-ordinate.

# Recommendation(s)

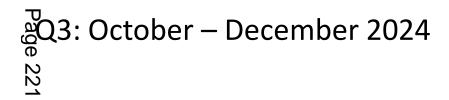
Members are asked to:

• Note the report.

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# National Lead Force City of London Police Performance Report





The dashboard provides an assessment of City of London Police performance against the objectives set out in the **National Policing Strategy for Fraud, Economic and Cyber Crime 2023-28**. The National Policing Strategy was launched in November 2023 and translates national strategies and objectives set by His Majesties Government into actionable measures for policing in the areas of fraud, money laundering and asset recovery and cyber. The report shows CoLP attainment against the objectives. The National Policing Strategy sets out a purpose to "improve the UK policing response to fraud, economic and cyber crime" through three **key cross cutting objectives** of:

• Improving outcomes for victims;

• Proactively pursuing offenders;

• Protecting people and business from the threat of Fraud, Economic and Cyber Crime.

The NLF plan sets out key cross cutting enabling commitments that City of London Police is seeking to achieve:		Q3
We will deliver and co-ordinate regional Proactive Economic Crime Teams and uplifted National Lead Force teams to form part of the National Fraud Squad. The NFS teams will proactively target fraudsters and disrupt offending achieving criminal justice and alternative outcomes.	仓	Û
We will deliver enhanced victim care & support to victims of fraud & cyber crime, to reduce harm of offending and prevent re-victimisation.	仓	仓
We will deliver agreed and consistent content across the PROTECT network, to ensure consistent messaging in line with HMG guidance and promoting HMG systems and services.	仓	仓
We will improve the policing response to fraud. Fraud and Cyber Reporting and Analysis Service (FCCRAS) objectives will be added when the system launches.	仓	⇔
We will increase the policing response and outcomes linked to NFIB / FCCRAS crime dissemination packages	仓	⇔
We will lead the National Fraud Squad to PURSUE identified high harm offenders through joint, centrally co-ordinated national operations and to participate in NECC led fraud intensifications throughout the year.	Û	仓
We will upskill and train our staff so that they are able to effectively respond to the threat of fraud, economic and cyber crime.	仓	⇔
We will develop and action a National Economic Crime Workforce Strategy.	] رل >	仓





Protect disruptions and social media impressions have exceeded the Home Office target significantly. This is due in part to press release in August regarding retail fraud and a DCPCU interview on BBC Morning Live which promoted engagement with social media.

National Lead Force hosted and organised a number of keypstrategic events in Q3:-

**National Strategic Economic Crime Briefing** – 190 attendees from police forces, regional crime units, NCA, NPCC, CPS and NECC.

**SOCEX** – 400 operational law enforcement professionals, government and industry representatives. **NUG (National User Group)** –200 attendees. Forces from all over the country attended.

**Protect Conference** –200 officers and staff. The very first joint protect conference which brought together both the fraud and cyber protect networks.



National Lead Force has exceeded its Home Office set target for judicial outcomes by a significant percentage. This is due to a number of outcomes linked to two large investigations in Q1 and Q2.

NFIB have implemented use of the new Foundry Platform in Q3. This has led to temporary abstractions of st7-dayiod to training and facilitating the launch of the new system.

NFIB sent less vulnerable person alerts this quarter, however 99% were sent within the 7-day target. There has been a drop in NFIB performance this quarter due to staff abstractions.

Action Fraud satisfaction has fallen 4% below the Home Office target.

NECVCU performance has been affected by staff abstractions due to training leading to a lower volume of calls being made.



Disruptions against organised crime groups are increasing. In Q3, NLF Ops teams recorded major disruptions for investigations into payment diversion and investment fraud.

Financial disruptions are also increasing. Following a successful investigation into a £2.7 million boiler room fraud, CoLP successfully applied for confiscation orders, with 134 victims being paid from the available £372,742.

National Lead Force operational teams supported the national money mule intensification Operation Emma 10.



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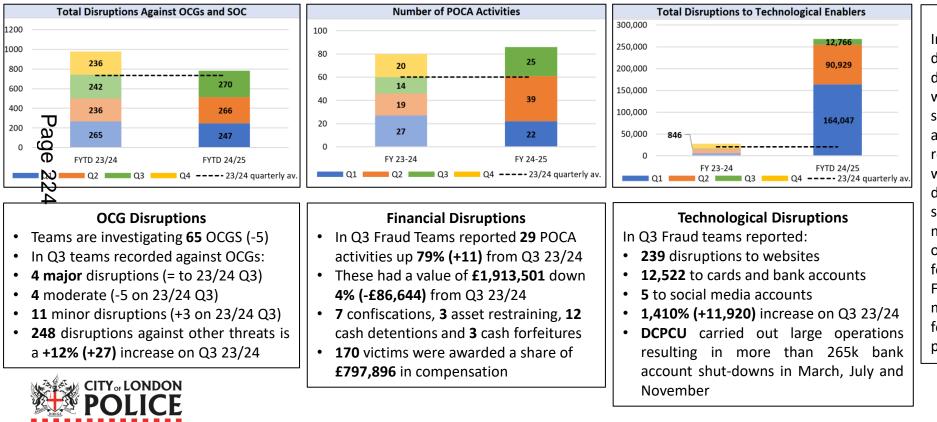
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We will deliver and co-ordinate regional Proactive Economic Crime Teams and uplifted National Lead Force teams to form part of the National Fraud Squad. The NFS teams will proactively target fraudsters and disrupt offending achieving criminal justice and alternative outcomes.

#### **Success Measures:**

- A. Increase the number of disruptions against fraud organised crime groups and serious organised crime
- B. Increase the number of POCA activities
- C. Increase the number of disruptions against technological enablers



#### Disruptions

In Q3, **NLF Ops** teams recorded major disruptions for investigations into payment diversion and investment fraud. A female carer was convicted of Abuse of Position of Trust and sentenced to 30 months suspended for 3 years, and a corporate employee fraud defendant received 3 years imprisonment. **PIPCU** worked with law enforcement across Europe to take down a large illegal streaming network. **DCPCU** saw 3 men sentenced to a combined 6 years 9 months for using a SIM farm to defraud victims of over £223k and **IFED** recorded 3 convictions for staged motor collisions.

Following a successful investigation into a £2.7 mil boiler room fraud, **CoLP** successfully applied for confiscation orders, with 134 victims being paid from the available £372,742.



Protect People and Businesses

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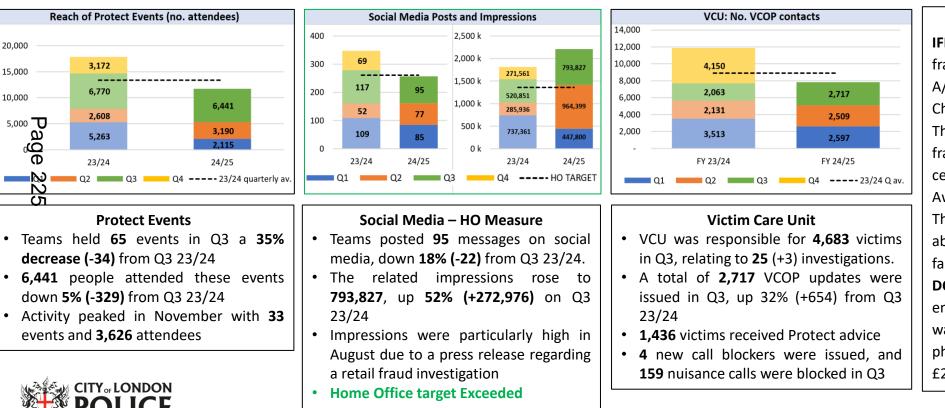
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We will deliver enhanced victim care and support to victims of fraud and cyber crime, to reduce harm of offending and prevent re-victimisation. We will deliver agreed and consistent content across the PROTECT network, to ensure consistent messaging in line with HMG guidance and promoting HMG systems and services.

#### **Success Measures:**

- A. Increase the number of protect engagements and attendees
- B. Increase the number of social media posts and impressions Home Office Measure
- C. Increase the number of Victim Support Unit contacts



# PROTECT and Social Media

**IFED** posted regarding moped 'crash for cash' fraud. Other media included a quote by the A/Commissioner on the new Insurance Fraud Charter and an interview in The Economist. The **NLF Ops** teams posted about romance fraud, featuring protect advice from celebrities, and publicised International Fraud Awareness Week.

The **PIPCU** DCI was interviewed by the BBC about the risks of fake car parts and ITV about fake goods before Christmas.

**DCPCU**'s interview on BBC Morning Live was engaged with on social media. A press release was sent on 3 men sentenced for sending phishing messages and stealing over £220,000.

Improve Outcomes for Victims

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We will increase the policing response and outcomes linked to NFIB / FCCRAS crime dissemination packages. We will lead the National Fraud Squad to PURSUE identified high harm offenders through joint, centrally co-ordinated national operations and to participate in NECC led fraud intensifications throughout the year.

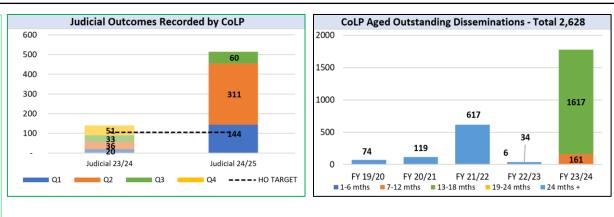
#### **Success Measures:**

- A. Increase the judicial outcome rate for CoLP Home Office Measure
- B. Decrease CoLP aged outstanding disseminations
- C. Support CoLP teams to engage in intensification efforts Home Office Measure

LFOR intensifications – HO Measure The CoLP Fraud Targeting Cell (FTC) disseminated 14 intelligence packages to the Proactive Economic Crime Teams (PECTS) as part of the EMMA 10 intensification. The FTC worked closely with the Cyber Defence Allisence to identify Money Mule Recruiters advertising services on social media.

Throughout November 2024 7 suspects were arrested relating to the packages. The interview of another suspect resulted in a Cease and Desist notice. There was positive feedback from the PECTs who commented on the proactive nature of the operation and comprehensive detail of the intelligence packages. **Home Office target met** 





Judicial Outcomes – HO Measure

- In Q3 CoLP teams recorded 60 judicial outcomes
- Up 81% (+27) from Q3 23/24, but down 81% from the previous quarter.
- 222 no further action outcomes were also recorded, up 95% (+108) from Q3 23/24
- Home Office target Exceeded

### **Outstanding Disseminations**

- At the end of Q3 **2,628** disseminations from 19/20 to 23/24 were with CoLP teams awaiting outcomes.
- This is down -5.54% (-154) from the end of the previous quarter showing ongoing improvement

### **Judicial Outcomes**

A national target of 6,000 judicial outcomes was set for 24/25, and this has now been exceeded by 5% with 6,275 outcomes reported. The combination of a number of large cases being finalised and the continued targeted engagement from the National Coordinators Office have been instrumental in reducing outstanding disseminations.

CoLP teams have contributed to this result with judicial outcome totals consistently above the 23/24 average.

61% of the 24/25 judicial outcomes recorded by CoLP are from two large NLF investigations recording 105 outcomes in Q1 and 209 in Q2.



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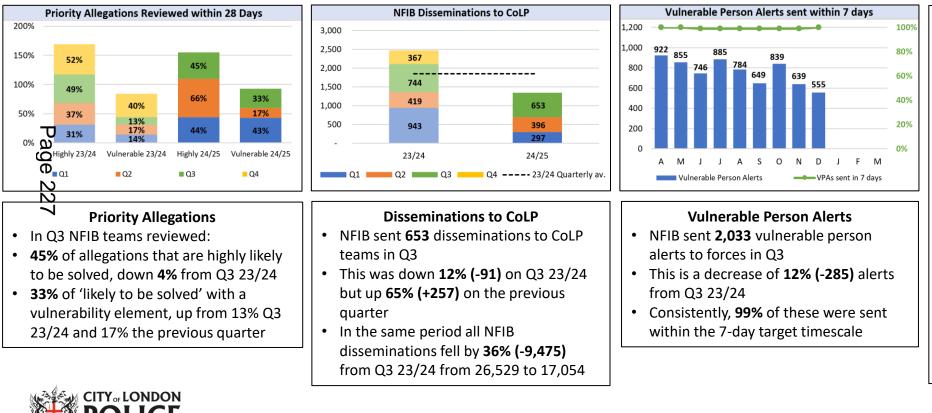
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We will deliver the Fraud and Cyber Reporting and Analysis Service (FCCRAS) - including the ability to feedback intelligence into the system for further development and inclusion in intelligence packages. We will ensure intelligence is appropriately recorded and disseminated to assist with all 4P outcomes

#### **Success Measures:**

- A. Increase the allegations of fraud reviewed in 28 days meeting 'highly likely' & 'likely vulnerable' on the solvability matrix
- B. Increase the number of NFIB packages disseminated to CoLP teams
- C. To review and, where appropriate, disseminate vulnerable person alert within 7 days.



# National Fraud Intelligence Bureau (NFIB) In Q3 the NFIB undertook implementation of a new platform alongside their existing technology. Although it was intended to have no parallel running, there is now an incremental change from the current service to the new platform whilst the build for the front-end service goes live.

This has seen the abstraction of staff to facilitate the process and 22 coaches trained to use the platform and given opportunities to familiarise themselves with the new system, before cascading the training to staff when it goes live.

In Q1 and Q2 NFIB supported MPS investigation Stargrew, disseminating 20k allegations and affecting business as usual.



Improve Outcomes for Victims

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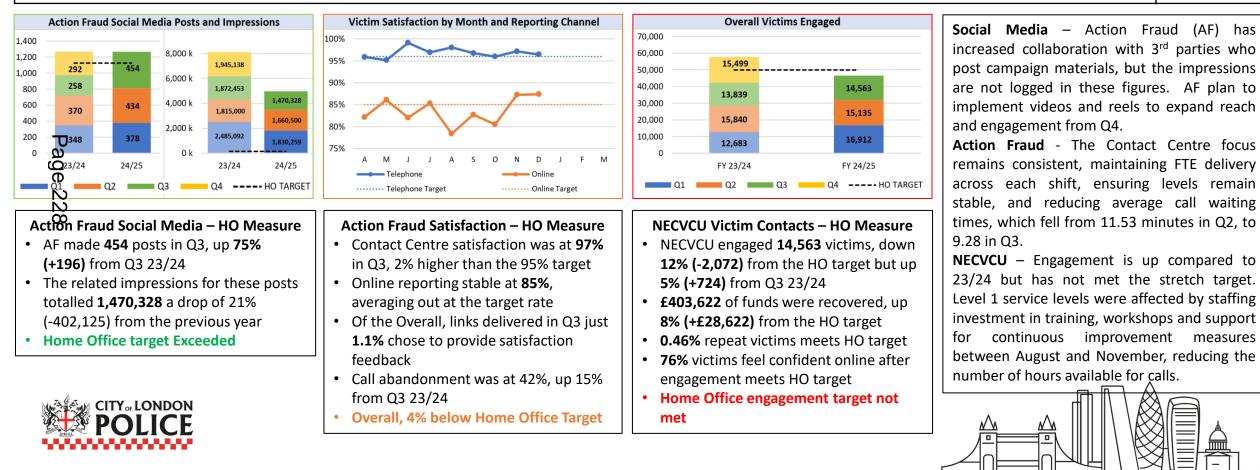
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We will improve the policing response to fraud.

Fraud and Cyber Reporting and Analysis Service (FCCRAS) objectives will be added when the system launches.

#### **Success Measures:**

- A. Increase the number of Action Fraud social media posts and impressions Home Office Measure
- B. Maintain the percentage of survey respondents who are satisfied with the Action Fraud reporting service **Home Office Measure**
- C. Increase number of fraud victims who receive protect advice (NECVCU engagement) Home Office Measure



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We will upskill and train our staff so that they are able to effectively respond to the threat of fraud, economic and cyber crime. We will roll out a revised performance framework across PURSUE, PROTECT, PREPARE and PREVENT. ROCUs and Forces to ensure completion of performance framework and resulting recommendations. We will invest in and explore technological and data sharing solutions and opportunities.

#### **Success Measures:**

- A. To increase delegate training levels in the Economic and Cyber Crime Academy (ECCA).
- B. Deliver objectives against National Workforce Strategy.
- C. National Coordinator's Office to complete visits to all ROCUs Home Office Measure

#### Workforce Strategy

The FIO student placement program, has reached a significant milestone: students are embedded into CoLP with FIO accreditation. They are taking on meaningful and impactful responsibilities. Preparations for the second cohort are well underway.

The Sdirect entry detective recruitment pathways for fraud and cybercrime are progressing positively. Fourteen recruits are set to begin their training in the PoliceNow academy/ CoLP this March.

Progress has been made in the development of the Living Library and the joint PwC/PSFA challenge panels, both of which are on track for launch by the end of February.





#### Academy

- In Q3 the ECCA held **18** courses, **equal** to the number in Q3 23/24
- The number of classroom delegates also stayed the same at **209** up 2 from 207
- Satisfaction at **88%** fell by **-2%** from Q3 23/24 due to poor venue in November
- Crypto training delegates continued to rise to 584 in Q3, compared to a total of 72 for the whole of 23/24.

### ECPHQ Activity

National Strategic Economic Crime Briefing – 10 October, the Barbican, London, around 190 attendees from police forces, regional crime units, NCA, NPCC, CPS and NECC.

**SOCEX** – 18-20 November, Stratford-upon-Avon, over 400 operational law enforcement professionals, government and industry representatives.

**NUG (National User Group)** – 27 November, Birmingham, over 200 attendees. Forces from all over the country attended.

**Protect Conference** – 28-29 November, Birmingham, around 200 officers and staff who work in protect with representatives from every region. The protect conference was the very first joint protect conference which brought together both the fraud and cyber protect networks. **Regional Visits – Home Office Measure** In Q3 three regions were visited, NWROCU on 15/16 October, SWROCU on 12/13 November and the NWROCU on 9/10 December. All demonstrated some excellent working practices that can be shared across the regions.

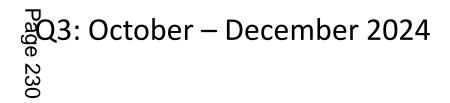
One observation was inconsistencies in how disruptions are identified and recorded on APMIS, particularly in respect of Protect activity. There are also inconsistencies with the hosting of regional threat groups and strategic governance groups (prosperity). Lastly, the influx of new staff (AMLAR, Fraud Reform) has stretched supervisory ratios beyond the recognised norm for some regions.

Home Office measure ongoing





# National Lead Force National Delivery Plan Performance Report





# **Performance Assessment**

The dashboard provides an assessment of national policing performance against the objectives set out in the **National Policing Strategy for Fraud, Economic and Cyber Crime 2023-28**. The National Policing Strategy was launched in November 2023 and translates national strategies and objectives set by His Majesties Government into actionable measures for policing in the areas of fraud, money laundering and asset recovery and cyber. The report shows national attainment against the objectives. The National Policing Strategy sets out a purpose to "improve the UK policing response to fraud, economic and cyber crime" through three **key cross cutting objectives** of: Improving outcomes for victims; Proactively pursuing offenders; Protecting people and business from the threat

The NLF plan seeks out key cross cutting enabling commitments that City of London Police is seeking to achieve		Q2	Q3
MLAR 1	We will increase criminal justice outcomes and disruptions against money laundering offenders.	Û	仓
MLAR 2	We will seize and restrain more criminal assets through including released asset denial activity	Û	仓
မျှေlar 3 ထ	We will provide training to policing on how to investigate and seize crypto assets. We will ensure accurate records of crypto assets seizures are maintained and provided.	仓	仓
O OPraud 1	We will increase the policing response and outcomes linked to NFIB / FCCRAS crime dissemination packages.	仓	仓
 ພ −Fraud 2	We will deliver and co-ordinate regional Proactive Economic Crime Teams and uplifted National Lead Force teams to form part of the National Fraud Squad. The NFS teams will proactively target fraudsters and disrupt offending achieving criminal justice and alternative outcomes.	仓	仓
Fraud 3	We will lead the National Fraud Squad to PURSUE identified high harm offenders through joint, centrally co-ordinated national operations and to participate in NECC led fraud intensifications throughout the year.	Û	仓
Fraud 4	We will support and assist the national development and implementation of the Fraud Targeting Cell by contributing resource and supporting the delivery of systems and processes. We will increase intelligence packages into the system leading to increased proactive operations.	Û	仓
Fraud 5	We will develop and deliver a centrally co-ordinated National Fraud PROTECT Network that will align with the National Cyber PROTECT Network, share best practice, and promote local delivery of national messaging.	⇒	Ŷ
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		Q2	Q3
Fraud 6	We will deliver agreed and consistent content across the PROTECT network, to ensure consistent messaging in line with HMG guidance and promoting HMG systems and services.	仓	Û
Cyber 1	We will increase the policing response and outcomes linked to NFIB / FCCRAS crime dissemination packages. We will ensure full and timely compliance from forces to record disseminations from the NFIB appropriately and that subsequent outcomes are reported back to NFIB correctly.	Û	⇒
Cyber 2	We will increase intelligence led proactive operations and self-development operations regarding Computer Misuse Act offending, ensuring the relevant deconfliction safeguards are followed.	仓	Û
Cyber 3	We will develop the current PROTECT notification processes to ensure a consistent approach to both the direct PROTECT officer taskings and the notifications delivered at scale.	仓	Û
Gyber 4	We will ensure ROCUs and Forces are regularly using Police CyberAlarm to help support member organisations when issues are identified and use the data to inform and drive PROTECT, PREVENT and PURSUE activity. PROTECT Officers will promote Police CyberAlarm to all SME organisations they engage with.	Û	Û
2 Cyber 5 2	We will deliver the new NPCC Cyber Resilience Centre (CRC) Model. This includes the new Operating Model to deliver the levels of consistency and assurance required. CRCs and PROTECT officers will work together to support each other's work and grow CRC membership.	仓	Û
Cyber 6	We will develop improved referral process for new nominals to include Target Operating Model and definition of when a referral should be made. We will introduce a single national or regional referral mechanism and implement risk assessment (CORA) and tasking mechanisms for PREVENT referrals.	仓	Û
Cyber 7	We will roll out the Cyber & Digital Specials & Volunteers (CDSV) Programme and platform to every region and Force and ensure effective management and utilisation of CDSV skills across the network.	Û	Û
Cyber 8	We will revise and roll out a clear training, CPD and accreditation pathway for all roles within TCUK, with regular reviews of the training needs analysis and advancements in technology / threats. NPCC Deliver new strategy and delivery with the Economic and Cybercrime Academy.	Û	Û



# **Executive Summary:** Key Cross Cutting Strategic Objectives







NFIB disseminations out to law enforcement are exceeding the Home Office Target. This is in part due to the exceptionally high number of disseminations in Q1 under a large national target let operation (Stargrew), however Q3 is higher than the previous year's average.

The has been a 68% increase in judicial outcomes in comparison to the previous year. The Home Office quarterly target has been exceeded by 32%. This is due to high levels of outcomes attributed to national target led operations, and also the increase in resources investigating fraud in regional units.

National cyber judicial outcomes are showing a 41% decrease compared to the previous year. This is in part due to the high number of outcomes recorded in 23/24 Q2 which skewed the figures



Money laundering disruptions and asset seizures are increasing – exceeding the Home Office target. This is highly likely to be due to the increase in resource delivered to regional crime units under the AMLAR Programme which is co-ordinated by CoLP. So far 93 extra staff have been delivered nationally. Asset seizures were £11m this quarter - £6m of which was from one operation in the North West targeting a solicitor who was enabling money laundering. Overall cryptocurrency seizures are reporting an £15,839% (+£9,389,376) increase in comparison to 23/24. This is due to the use of new powers under the Economic Crime and Corporate Transparency Act, alongside upskilling and national procurement of analysis services by CoLP.

Operation EMMA 10 took place, targeting higher harm individuals responsible for recruiting money mules online (mule herders). The national operation resulted in 76 arrests, 43 warrants, £818,000 in seizures of cash and cryptocurrency, 13 asset freezing orders and 153 cease & desist notices and was a great success. City of London Police co-ordinated the policing response and provided actionable intelligence nationally.

National Protect surveys are now being issued at events nationally. The survey data for the first quarter has been useful in gaining quantitative and qualitative feedback from attendees at events hosted by the National Fraud Protect Network. 98% of attendees were satisfied with their engagement, with 96% likely to change their behaviour. Completion of these surveys is a target set by the Home Office

In Q3 National Protect disruptions have exceeded the Home Office target due to the high level of activity being undertaken by the new National Protect Network.

There has been an increase to the number of Cyber Crime Unit referrals to Cyber Resilience Centres.

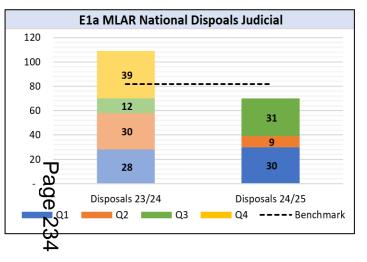


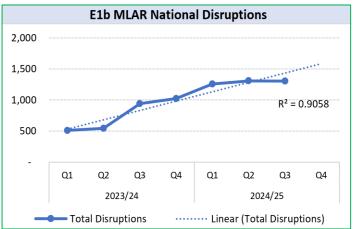
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Performance Measure 1: We will increase criminal justice outcomes and disruptions against money laundering offenders.

#### **Success Measures:**

E1a Increase judicial outcomes for money laundering cases. E1b Increase the number of disruptions at all levels – Home Office Measure





**E1a** Currently, there are no judicial outcomes recorded for money laundering and asset recovery on APMIS, as they are not tracked under the current Home Office framework. However, we can measure judicial disposals within the Criminal Justice System. These are now counted towards the KPI measures of Judicial Outcomes. This data is likely underreported.

For Q3, 31 judicial disposals were recorded, this is 158% (+19) increase compared to Q3 for the previous year.

2024/25 is reporting 70 judicial disposals so far, this is 14% (-12) under the benchmark target from 23/24.

**E1b** Money laundering and asset recovery is classed as illicit finance on APMIS. In Q3, there were a total of 1,302 disruptions.

- 66 major 5% increase (+3) in comparison to Q3 23/24
- 251 moderate 70% increase (+103) in comparison to Q3 23/24
- 953 minor 33% increase (+237) in comparison to Q3 23/24

The benchmark from 23/24 was 3,019, which translates to 755 disruptions per quarter. For Q3, disruptions are 72% (+547) above the benchmark target. Overall, a positive quarter for disruptions. Home Office Target Exceeded The Agency and Partner Management Information System (APMIS) is the performance reporting and tasking system for the NCA and partners. The majority of data in this report is taken from this system.

APMIS was rolled out to all forces in 2023. The number of forces that are loading fraud, economic and cyber crime data is growing as forces obtain more licenses, however this is still a work in progress.

CoLP is encouraging all forces and regions in the use of APMIS during regular force engagement visits.



**Performance Measure 2:** We will seize and restrain more criminal assets through including released asset denial activity

Performance Measure 3: We will provide training to policing on how to investigate and seize crypto assets. We will ensure accurate records of crypto assets seizures are maintained and provided.

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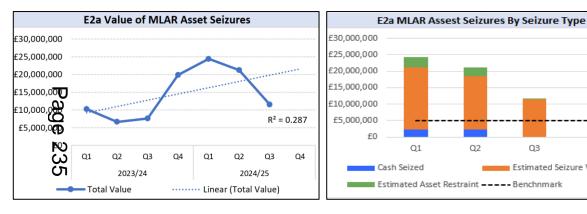
Estimated Seizure Value

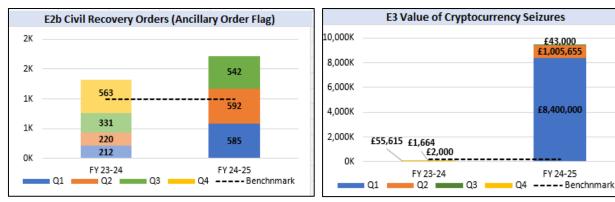
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#### **Success Measures:**

E2a Increase the number of asset freezing orders, restrained assets, and recovered and confiscated assets. E2b Increase the number of Civil Recovery Orders.

E3 Recover a higher number of crypto assets.





E2a In Q3 a value of £11,662,880 asset seizures were recorded for money laundering and asset recovery. This is a 52% (+£3,952,434) increase from the same period in 23/24, and 137% (+£6,678,692) above the 23/24 quarterly average. The value has dropped in comparison to the previous quarter, but the annual figure is showing a significant rise. The North West seized £6M from one operation targeting solicitors facilitating money laundering.

**E2b** Previously, civil recorder orders were unavailable. Most civil recoveries are recorded as either disruptions in APMIS, or via a flag for Ancillary Orders. Please note that these figures are subject to change. Q3 is reporting a 63% increase (+211) in comparison to the same period in 23/24. Overall, figures are reporting at 30% (+393) above the benchmark for 23/24.

E3 For Q3, there has been £43,000 in cryptocurrency seizures. Q3 is reporting 23% (-£12,615) below the quarterly benchmark, however, overall cryptocurrency seizures are reporting an 15,839% (+£9,389,376) increase in comparison to 23/24. This increase can be explained by the new powers that came into force this year for crypto asset seizures.

It is believed that all ROCUs are seizing crypto assets, and in the last year ROCUs have also corrected some input errors on APMIS, inflating the 24/25 figures in comparison to 23/24.



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

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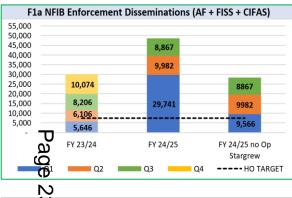
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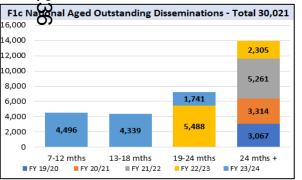
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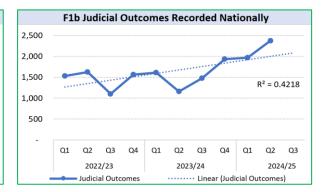
Performance Measure 1: We will increase the policing response and outcomes linked to NFIB / FCCRAS crime dissemination packages.

#### **Success Measures:**

F1a Increase the number of NFIB Pursue disseminations received and alternative positive outcomes (Outcome 22) – Home Office Measure
 F1b Improve the judicial outcome rate and the alternative positive outcome rate – Home Office Measure
 F1c Reduce the percentage of outstanding returns.







**F1c** For aged outstanding disseminations, data up to November 2024 reports 44% (49,466) of disseminations are marked as outstanding for England and Wales.

In comparison to Q2 24/25, this is a 6% decrease (-1,820), which is positive.

**F1a** NFIB disseminations increased in Q3 by 11% (+661) in comparison to Q3 for the previous year. Q1 reported a large increase due to Met led operation Op Stargrew, targeting a webbased platform described as a one-stop shop for phishing. Q2 & Q3 are reporting figures closer to normal range, however still considerably larger than the previous year's average. A reason for this is that the National Coordinator's Office have continued working with forces to reduce their aged disseminations, particularly across the periods of 2019-20 to 2021-22. Forces have responded positively to this work. **Home Office Target Exceeded** 

We are currently not able to measure alternative positive outcomes due to changes being made within the Home Office counting rules.

**F1b** Nationally, there have been 2,373 judicial outcomes during this period and 10,985 nonjudicial outcomes. This represents a 68% (+964) increase in judicial outcomes in comparison to the previous year. NFA outcomes have increased by 18% (-1,653) in the same period. The Home Office quarterly target of 1,547 has been exceeded by 32% (1,481). **Home Office Target Exceeded** 

All 45 forces were compliant in providing outcome information in a timely manner in Q3.



Total outcomes reported in a period can relate to disseminations from any time. The volume of outcomes fluctuates throughout the year as cases with varying numbers of crimes attached are completed. E.g. an investigation into a boiler room might have hundreds of outcomes attached to it and closing the case will give many outcomes, potentially bringing closure to multiple victims.

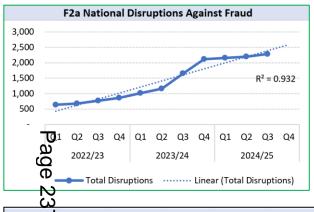


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Performance Measure 2: We will deliver and co-ordinate regional Proactive Economic Crime Teams and uplifted National Lead Force teams to form part of the National Fraud Squad. The NFS teams will proactively target fraudsters and disrupt offending achieving criminal justice and alternative outcomes.

#### **Success Measures:**

**F2a** Increase the number of disruptions against Fraud – **Home Office Measure F2b** Increase the number of disruptions against Fraud organised crime groups (OCGs).



**F2a** Nationally there were 2,282 disruptions recorded for Q3. This is 39% above the quarterly benchmark for 23/24 (+635).

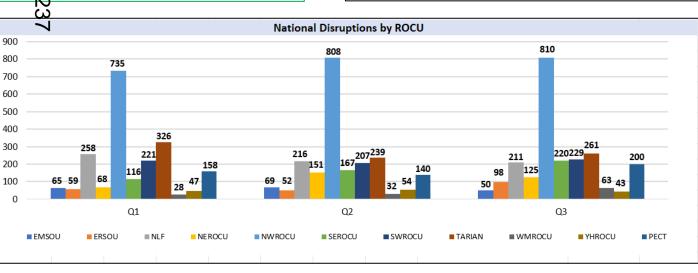
For fraud related disruptions there were:

**21 major** disruptions - 24% increase (+4) in comparison to Q3 23/24

**130** moderate disruptions - 25% decrease (-43) in comparison to Q3 23/24

• 2,124 minor disruptions - 49% increase (+703) in comparison to Q3 23/24 Home Office Target Exceeded **F2b** For OCG related disruptions, there is a software related issue which is currently in development, and we expect the data to be available for Q4.

Overall, there has been an increase in recording disruptions on APMIS, however the incorrect labelling of the different types of disruptions can cause a skew in the statistics. Ensuring the disruptions are correctly labelled as OCG disruptions can help to mitigate this. CoLP are engaging with all forces and regions to encourage the correct usage of this system.



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Performance Measure 3: We will lead the National Fraud Squad to PURSUE identified high harm offenders through joint, centrally co-ordinated national operations and to participate in NECC led fraud intensifications throughout the year.

**Performance Measure 4:** We will support and assist the national development and implementation of the Fraud Targeting Cell by contributing resource and supporting the delivery of systems and processes. We will increase intelligence packages into the system leading to increased proactive operations

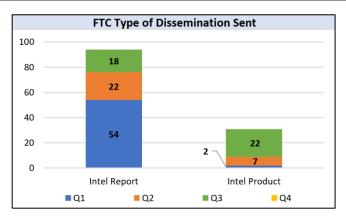
#### **Success Measures:**

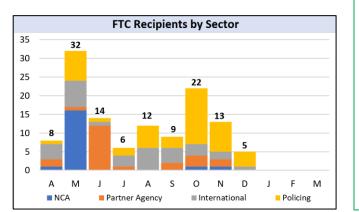
F3 Engage in all intensification efforts and target led national operations and evaluate operation-specific outcomes – Home Office Measure
 F4 Increase the number of Fraud Targeting Cell packages allocated, adopted and investigated – Home Office Measure

F3 In Q3, Operation EMMA 10 took place, targeting higher harm individuals responsible for recruiting money mules online (mule herders). Working with private sector partners and The Cyber Defence Alliance, several mule herders were identified operating on Telegram and Snapchat. The operation resulted in 76 arrests, 43 warrants, £818,000 in seizures of cash and cryptocurrency, 13 asset freezing orders and 153 cease & desist notifes. Other seizures included a vehicle, multiple high value mobile devices, bank cards, Class A drugs and approx. 60,000 counterfeit cigarentes.

35 cease and desists were revisited which had been issued during EMMA9. No further intelligence had been received of any continued offending, highlighting the success of the tactic.

In Q4, **Henhouse 4** will take place. which is the annual system wide Pursue intensification on fraud and takes place throughout February. In total, **£763K in bids** have been approved through the NECC led moderation panel, with activity taking place across all 43 police forces, all regions and partners including NCA, FCA and Trading Standards. A comprehensive media strategy is in place to ensure we maximise impact with the public in reassuring victims on the law enforcement response, to deter potential offenders and use the raised profile in the public for protect messaging. **Home Office Target Met** 





**F4** The Fraud Targeting Cell (FTC) is a multi-agency team, comprised of staff from CoLP and the National Crime Agency, and primarily focused on proactive, suspect led intelligence development into the highest harm fraud offenders impacting the UK. The team launched in April 2024 and produce intelligence packages for the National Fraud Squad (NFS) and the wider system.

In Q3, the FTC ran a well-attended **workshop at SOCEX**, leading to future collaborative opportunities with partners. A referral from an external partner about a Ponzi scheme was developed and then taken on by Fraud Operations with multiple arrests taking place, which would not have been possible without utilising the skills and capabilities of both the CoLP and NCA parts of the FTC.

PECT teams made **13 arrests** based on proactive intelligence about mule herders on Telegram. The FTC is also working with Mobile Network Operators on 'sim farms,' with activities planned for the next quarter. **Home Office Target Met** 

Fraud

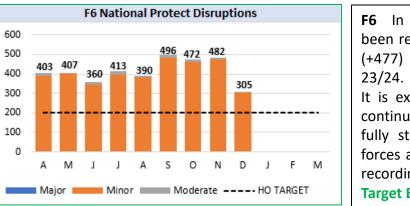
Performance Measure 5: We will develop and deliver a centrally co-ordinated National Fraud PROTECT Network that will align with the National Cyber PROTECT Network, share best practice, and promote local delivery of national messaging.

**Performance Measure 6:** We will deliver agreed and consistent content across the PROTECT network, to ensure consistent messaging in line with HMG guidance and promoting HMG systems and services.

#### **Success Measures:**

F5a Increase the number of Protect engagement events and attendees – Home Office Measure
 F5b Percentage of protect engagement event attendees (organisations and public) satisfied with the engagement they attended – Home Office Measure
 F5c Percentage of protect engagement event attendees (organisations and public) likely to change their behaviours as a result of engagement – Home Office Measure
 F6 Increase the number of individuals reached with social media campaigns – Home Office Measure

**F5b&c** The National Protect Coordinator and their team finalised surveys for protect engagement attendees, and they have been used from the beginning of October. The survey data for the first quarter has been useful in gaining quantitative and qualitative feedback from attendees at events hosted by the National Fraud Protect Network. This enables a full picture of the Network and the work they do to communicate a consistent protect message to the public and organisations, and the behavioural change it encharages. **98%** of attendees were satisfied with their engagement with **96%** likely to charge their behaviour. **Home Office Target Met** 



**F6** In Q3 1,260 disruptions have been reported, an increase by 61% (+477) on the same period of 23/24.

It is expected that this trend will continue as Protect teams become fully staffed and embedded, and forces and regional teams increase recording on APMIS. **Home Office Target Exceeded**  **F5a** 45 engagements were held across the network, with 184 attendees. Some local campaigns supported by Protect staff include:

• **NWROCU**: The Fraud Protect Coordinator organized a conference for officers from six North West forces, focusing on the Banking Protocol and the recently implemented PSR. This event provided CPD for the officers.

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- **Tarian**: The Protect team presented at the Fintech Wales conference in Cardiff, discussing cyber and fraud prevention and the use of AI. They also participated in Scam Awareness week at the BBC, utilizing the Cyber Van, and were featured on BBC Radio Wales.
- **ERSOU**: The Fraud Protect team worked with universities and colleges, creating new Fraud Protect information packages for Cease & Desist visits as part of Op Emma 10.
- Met Police: The team is addressing the theft of mobile phones and subsequent fraud, collaborating with financial institutions, crypto exchanges, and the mobile phone industry.
- Y&H: For Op Emma 10, all FE Colleges in the Yorkshire & Humber region were offered briefings for student safeguarding staff on the types of fraud targeting students, including sextortion. A series of meetings and presentations are being conducted across the region.
- **SWROCU**: Fraud Protect achieved the first-ever official major disruption recorded on APMIS in the country. They created an asset pack for Op Emma 10, which included a video, pre-made social media posts, posters, flyers, and still images for digital screens.

• Home Office Target Met

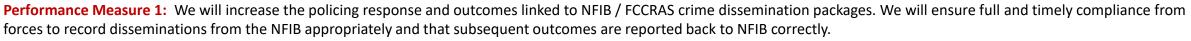
Cyber

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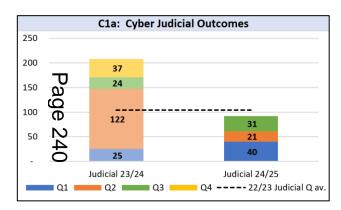


Performance Measure 2: We will increase intelligence led proactive operations and self-development operations regarding Computer Misuse Act offending, ensuring the relevant deconfliction safeguards are followed.

#### **Success Measures:**

C1a Improve the judicial outcome rate

- C1b Increase the number of disruptions against cyber crime
- C2 Increase the number of operations involving the Computer Misuse Act (CMA)



**C1a** Nationally, there have been 31 cyber judicial outcomes during this period and 1,068 non–judicial outcomes. This is a 29% (-7) decrease in comparison to the same period of the previous year. Q2 for 23/24, was a high judicial outcome month with 122 judicial outcomes. Overall, judicial outcomes are reporting a 41% (-64) decrease in comparison to the benchmark for the previous year.

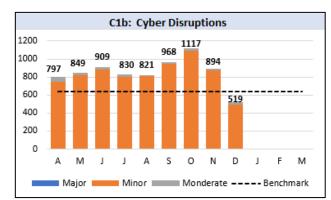
**C1b** National cyber disruptions are reporting a 25% increase (-510) in comparison to the same period for the previous year. While December figures may be reporting low, overall cyber disruptions have surpassed the benchmark for the entire 23/24 period by 1% (+71).

For Q2 there have been:

- 7 major disruptions 40% increase in comparison to Q3 23/24 (+2)
- 69 moderate disruptions 4% increase in comparison to Q3 23/24 (+3)
- 2,454 minor disruptions 26% increase in comparison to Q3 23/24 (+511)

**C2** The Police Cyber Alarm (PCA) pilot expanded in Q3 24/25, distributing Notification Packs to most regions, though not all received Local Malicious IP addresses. A national webinar in January 2025 will launch and distribute Vulnerability and Local Malicious IP Addresses starting February 2025. Officers and staff have welcomed the Notification Packages, recognising PCA's benefits for law enforcement and SMEs. Increased engagement with member organisations has led to initiatives like staff awareness sessions, cyber exercises, and adoption of the NCSC Early Warning Service and CRC core membership. However, a time lag is expected for 'use cases' due to the time taken for subscriber checks on Local Malicious IP Addresses.

The NPCC, partnering with private sector entities, has developed intelligence opportunities to identify UK-based cyber criminals, with a successful proof of concept. Intelligence from third parties is enriched by the NPCC team and forwarded to TICAT for deconfliction and tasking, managed by NCPT and CPDB. Initial intelligence packages are being refined before formalisation, and contracts with intelligence providers are being procured to provide intelligence and expedite the process.



Cyber

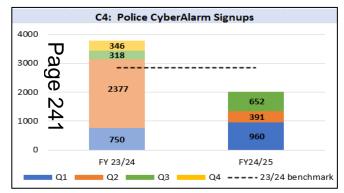
**Performance Measure 3:** We will develop the current PROTECT notification processes to ensure a consistent approach to both the direct PROTECT officer taskings and the notifications delivered at scale.

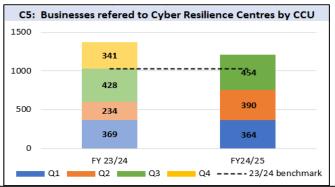
**Performance Measure 4:** We will ensure ROCUs and Forces are regularly using Police CyberAlarm to help support member organisations when issues are identified and use the data to inform and drive PROTECT, PREVENT and PURSUE activity. PROTECT Officers will promote Police CyberAlarm to all SME organisations they engage with.

Performance Measure 5: We will deliver the new NPCC Cyber Resilience Centre (CRC) Model. This includes the new Operating Model to deliver the levels of consistency and assurance

required. CRCs and PROTECT officers will work together to support each other's work and grow CRC membership

Success Measures:	
C3 Develop the Protect notification procedure and increase notifications issued.	Û
C4 Protect Officers to promote Police CyberAlarm to SME organisations.	Û
C5 Increase the number of Cyber Crime Unit referrals to Cyber Resilience Centres.	Û





**C4** In Q3, 652 Small to Medium-sized enterprises (SMEs) signed up to Police CyberAlarm. This is a 67% increase in comparison to Q2, however overall, performance is reporting 30% below the Q3 benchmark (-840). During Q2 23/24 there was a spike in PCA sign ups, this was credited to the Department for Education (DfE) sending out a reminder to schools that membership was a condition of obtaining a Risk Protection Agreement (RPA), essentially commercial insurance. The DfE is an established supporter of Police CyberAlarm, recognising the technical cyber security protection it offers educational establishments that otherwise might not be able to afford specialist IT support.

**C5** There has been an increase to the number of Cyber Crime Unit referrals to Cyber Resilience Centres. For Q3, there were 454 referrals made, this is a 6% increase (+26), in comparison to Q3 23/24. Overall, referrals are reporting 17% (+179) above the 23/24 Q3 benchmark. **C3** In November 2024, an updated operating procedure for the dissemination of three differing types of Protect notifications - Urgent Protect, Protect and Retrospective Protect was introduced. Notifications are sent out by NFIB (unless urgent then directly from source) to the regional Protect teams.

A new KPI has been added to the NPCC Performance Framework for Regional Cyber Crime Units for Q4 24/25: TCUK to complete 100% of NCA Triage, Incident and Tasking (TICAT), or NFIB Protect taskings. This will formalise performance reporting around Protect taskings, 440 had already been sent to the network during Q1-Q3 24/25 using the old operating procedure. Protect Notification outcomes will also be captured, helping to quantify impact of the Protect network; for example, the average ransomware payment is assessed to be £1.75 mill (NAC assessment) therefore each successful Protect intervention could be said to save UK businesses such an amount.

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**Performance Measure 6:** We will develop improved referral process for new nominals - to include Target Operating Model and definition of when a referral should be made. We will introduce a single national or regional referral mechanism and implement risk assessment (CORA) and tasking mechanisms for PREVENT referrals. **Performance Measure 7:** We will roll out the Cyber & Digital Specials & Volunteers (CDSV) Programme and platform to every region and Force and ensure effective management and

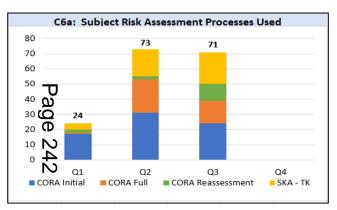
vertormance vieasure 7: We will roll out the Cyber & Digital Specials & Volunteers (CDSV) Programme and platform to every region and Force and ensure effect utilisation of CDSV skills across the network.

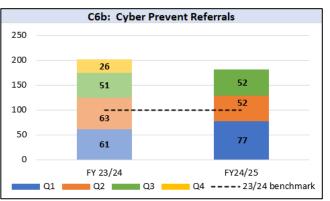
#### **Success Measures:**

C6a Increase the number of CORA assessments made

C6b Increase the number of PREVENT referrals

**C7** Increase the number of CDSV Programme participants and their utilization across the network.





**C6a** Cyber Offending Risk Assessments (CORA) consolidate threat, vulnerability, and impact data to equip decision makers with actionable intelligence for securing their cyber infrastructure. The number of risk assessments using this process decreased from Q2 to Q3 from 46 to 42, a decrease of 3% (-4). Q2 & Q3, however have shown a large increase in comparison to Q1.

**C6b** \**Please note this data is for October and November only.* A total of 52 Cyber Prevent referrals were received in Q3 down 2% (-1) from Q2 the previous year. There has been an improvement on the 23/24 quarterly average of 50 referrals, which has been met in Q3. The measure appears on track to improve upon last year's total. **C7** In Q3, ten volunteers joined across six different force or regional teams, bringing the total to 128 across 33 teams. The volunteers remain primarily in the cyber network, although work has expanded into fraud, economic crime and wider SOC. The value of volunteering was recognised by nominations for outstanding CDSVs and CDSV managers for NPCC Cybercrime Commendations throughout Q3. Activities in Q3:

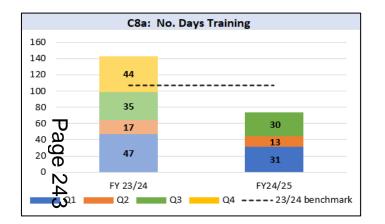
- Al generated audio detection project engagement with Home Office innovation and research on new applications for voice alteration
- Delivery of Cyber escape rooms/exercises at various locations
- Dark Net Market monitoring and intelligence generation
- Guest lecture on AI and Crime at the University of Portsmouth
- Al training delivery to Merseyside Police ECU
- Cyber Protect and Prevent presentation to parents of schoolchildren
- Project to provide automated systems to monitor activity and performance recording for POLIT and Cyber.
- Assistance with reviewing and further developing python scripts written by NYP Cybercrime.
- Op Tipper taskings (OSINT for high-risk stalking cases)
- Workshop input to 19 second year business students concerning the application of data security topics.

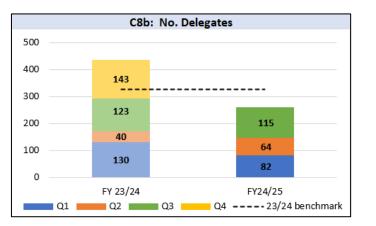
Cyber

Performance Measure 8: We will revise and roll out a clear training, CPD and accreditation pathway for all roles within TCUK, with regular reviews of the training needs analysis and advancements in technology / threats. NPCC Deliver new strategy and delivery with the Economic and Cybercrime Academy.

#### **Success Measures:**

C8a Increase the number of Cyber training daysC8b Increase the number of Cyber training delegates





**C8b** The number of delegates followed a similar seasonal pattern to 2023/24, with Q3 reporting an 80% increase (+51). In comparison to Q3 for 23/24, there is a 7% decrease (-8) in training delegates.

SudoCyber is a gamified learning platform where access is provided to officers and staff across TCUK by NPCC Cybercrime to support initial learning and ongoing CPD. SudoCyber contains multiple short training modules called labs covering a variety of areas across the 4Ps. For Q3, SudoCyber has seen a 10% increase in the completion of training labs.

The NPCC Cybercrime Team is now using AccessPlanit (the same platform as ECCA). In populating the cyber resources on the platform, the NPCC Team can now review and understand the capacity of the networks. The ability for regions and forces to book their own courses is now expected to go live in February 2025.

**C8a** During Q3, 30 days of training were delivered to 115 delegates. The number of courses has increased in comparison to Q2 by 131% (+17), however it was noted in Q2, there is often a seasonal dip in the second quarter. In comparison to Q3 for 23/24, training days are reporting a 14% decrease (-5).



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Committee(s)	Dated:
Streets & Walkways Sub Committee	4 February 2025
Police Authority Board	12 February 2025
Policy & Resources Committee	13 February 2025
Subject: Anti-Terrorism Traffic Regulation Order	Public
Which outcomes in the City Corporation's Corporate	Diverse Engaged
Plan does this proposal aim to impact directly?	Communities
	Vibrant Thriving Destination
Does this proposal require extra revenue and/or capital spending?	Νο
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the	N/A
Chamberlain's Department?	
Report of: Executive Director, Environment Department	For Information
Report author: Ian Hughes, City Operations Director	

# Summary

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

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

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

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

# Recommendation(s)

Members are to note the usage of the ATTRO during 2024, and that it will remain in place until the next review in a years' time.

# Main Report

# Background

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

activation of security measures to meet operational requirements given the unpredictability of the current terrorist threat.

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

# **Current Position**

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

# **ATTRO Requests**

- 14. In the seven years between 2016 and 2023, the City Police Commissioner requested use of the ATTRO on 13 separate occasions, all in relation to a particular special event. Six of those requests involved the annual New Year's Eve celebrations as part of the Metropolitan Police-led operation across Central London. The other seven were as follows:
  - The funeral of PC Keith Palmer at Southwark Cathedral (2017)
  - The IAAF Marathon (2017)
  - The Lord Mayor's Show & Fireworks (2017)
  - The Grenfell Tower Memorial Service at St Paul's Cathedral (2017)

- Her Majesty the Queen's Platinum Jubilee Service at St Paul's Cathedral (2022)
- Events related to the passing of Her Majesty Queen Elisabeth II and the accession of His Majesty King Charles III (2022)
- London Marathon (2023)
- 15. In 2024, three requests were made and approved in relation to events. Two were similar to requests from 2023, namely the London Marathon and New Year's Eve, with the third being in relation to a demonstration by the Campaign Against Anti-Semitism in December. All three were made alongside ATTRO requests from the Metropolitan Police to other Highway Authorities as part of a pan-London policing operation.
- 16. Post-event feedback would suggest the additional powers contained in the ATTRO were used sparingly, but where used, they proved helpful in ensuring the mitigation of terrorism risk. There was no noticeable or negative impact on the general public and none of their uses exceeded 48 hours, which would have otherwise triggered a review by the Town Clerk & Commissioner as per the standing protocol.

# **Corporate & Strategic Implications**

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

- 21. The City of London Local Plan 2015 aims to ensure that the City remains a safe place to live, work and visit. Core Strategic Policy CS3 makes specific provision for implementing measures to enhance the collective security of the City against terrorist threats. It seeks to apply those measures to broad areas, including the City as a whole, encouraging the development of area-based approaches to implementing security measures. The Local Plan is now under review but is expected to continue that approach.
- 22. The risk of terrorist attack remains one of the top corporate strategic risks for the City Corporation because of the City's concentration of high profile, historic and financial targets. In addition, the City's Corporate Plan 2024-2029 reiterates the key aims of ensuring people are safe & feel safe and that we protect the users of our buildings, streets & public spaces.
- 23. Otherwise, the legal implications on the use of the ATTRO remain unchanged from the original 2016 report and are repeated in Appendix 1 for reference.

# **Risk Implications**

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

# Legal & Equalities Implications

25. See Appendix 1.

# Financial, Resource & Climate Implications

26. None

# Conclusion

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

# Appendices

# **Appendix 1 - ATTRO Legal Considerations**

Ian Hughes Director, City Operations Environment Department

T: 020 7332 1977 E: <u>ian.hughes@cityoflondon.gov.uk</u>

# Appendix 1 - ATTRO Legal Considerations

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

remove or reduce the threat of and/or impacts of incidents, it is considered that the ATTRO can be justified and any resulting interference legitimate.

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# Agenda Item 16

# **City of London Corporation Committee Report**

Committee(s):	Dated:
Professional Standards and Integrity Committee – For	6 <sup>th</sup> February 2025
information	,
Strategic Planning & Performance Committee – For	11 <sup>th</sup> February 2025
	TT TEDIDATY 2025
Information	
Police Authority Board – For Information	12 <sup>th</sup> February 2025
Subject:	Public report: For
Equity, Diversity, Inclusivity (EDI) Update	Information
This was said	Desale and este and feel
This proposal:	People are safe and feel
<ul> <li>delivers Corporate Plan 2024-29 outcomes</li> </ul>	safe
Does this proposal require extra revenue and/or	No
capital spending?	
capital spending?	
If so, how much?	N/A
	IN/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the	N/A
Chamberlain's Department?	
· .	
Report of:	Commissioner of Police
Depart outhor:	Det Supt Kete Meel es d
Report author:	Det Supt Kate MacLeod
•	-

# Summary

Following consultation with internal stakeholders and external partners, we are now able to present our EDI Strategy Implementation Framework which has recently been submitted in force through our internal governance boards. As have also produced an accompanying Plan which outlines our Year 1 priorities and delivery milestones from within the framework. Our focus within Inclusivity Culture and Organisational Development (ICOD) is now on finessing our performance packs and outcome measures to support this, ensuring we are prioritising competing tasks effectively.

Delivery of our Inclusivity Programme is ongoing, over 400 places were taken on modules between October and December 2024, a calendar of events for 2025 has been created, ensuring alignment to National days of EDI significance. Linked to this,

mapping of our Evaluation Strategy is now underway and has been made an ICOD priority for 2025.

A review of our Staff Networks and Associations has been completed and a series of recommendations ratified through our internal governance- this has included a decision to increase the number of hours that active members are expected to spend on network activities.

We are proud that the National Black Police Association (NBPA) has selected CoLP as the host force for this year's NBPA Conference, the first time it has come to central London since it was founded in 1998. We are aware of both the opportunities and challenges this presents, a Planning Committee has been established and 2 initial meetings have taken place to carefully monitor, review and drive this activity.

Other core deliverables for ICOD in 2025 are underway, notably herein we provide updates on our Code of Ethics lead (including the creation of an Ethics Committee) and Police Leadership Programme).

# Recommendation(s)

Members are asked to:

• Note the report.

# **Main Report**

# i. Local Update and Developments

#### EDI Governance, Implementation and Measurement within CoLP

1. Our EDI Strategy was published in July 2024, we were awarded our 'silver' rating by Inclusive Employers in September 2024. Since this time, the ICOD team have worked with internal stakeholders and key partners to produce our Implementation Plan and accompanying Framework and delivery milestones, this can be found at Appendices 1 and 2. The framework takes each of the 'Commitment' statements made within the four sections of the strategy (Our People, Our Policies, Our Public and Our Partners) and provides 'SMART' (specific, measurable, achievable, realistic and timely) actions against each one. Alongside this, we have also incorporated recommendations from our

Inclusive Employers Assessment as we work towards a 'Gold' rating over the next 5 years.

2. In addition to assigning ownership, we have also awarded a 'low', 'medium' or 'high' priority status to ensure that we maintain focus. In parallel, we have projected the status of each initiative over a 3 year period as either:-

Developing	Project / initiative is underway or in planning stages but not yet delivered
Achieving	Project / initiative has been delivered at base level but not evolved further
Advancing	Project / initiative has been delivered and has reached a sophisticated stage (for example, gone a step further by informing National innovative practice)

- 3. This methodology replicates that used by the College of Policing, with the aim of ensuring consistency of approach.
- 4. The framework has gone through a series of consultations, internal workshops have taken place both before and after the holiday season where we have achieved representation from members of our Black Police Association (BPA), Network of Women (NoW), Disability Enabling Network (DEN), Christian Police Association (CPA), LGBTQ+ and Police Staff Networks, along with members of our Trade Union and Police Federation. Externally we have consulted with colleagues at Inclusive Employers, Business Disability Forum (BDF), the College of Policing and via specialist EDI Peer review. Feedback has been positive, with colleagues particularly encouraged that the plan now goes beyond 'words and statements' and towards more tangible actions. Concerns were raised over the number of initiatives proposed, this has been negated by a stringent prioritisation grid / milestone assessment. Alongside this, ICOD are also presenting to our Chief Officers next month on our key priorities and deliverables for the year ahead, thereby incorporating this framework.
- 5. Our next steps are towards ensuring that we have clarity on our outcomes and the measurement of these. Our EDI Performance Pack / Dashboard continue to evolve and will capture these metrics as we develop our work in this area. At this time we have focused prioritisation around our Year 1 activities- we will need to dedicate more time towards the mapping for Years 2 and 3.

# Inclusivity Programme Update

6. From October through to December, we delivered twelve 'face to face' events and two online modules with a total number of 410 attendees. This included

our established events (Active Bystander, Ethical Dilemmas and Mentivity -Black History / Stop Search). We have also begun our new module 'Understanding Ideologies', this will continue to be delivered through to March 2025 after which time we will review. We continue to conduct a basic evaluation for each session, feedback continues to be positive and we ensure we follow up with practical steps. For example our 'focus on - Managing colleagues with health conditions, neurodiversity and disability' was delivered in partnership with members of our Disability Enabling Network and HR, this forms part of a wider training piece that HR are leading on for Supervisors.

7. In November, aligned to White Ribbon Day, we delivered two sessions with specific focus on Violence Against Women and Girls. Detective Chief Supt Zara Brown from Bedfordshire Police provided an 'in person' talk on a high profile investigation she lead on relating to a serious sexual assault, providing insights on best forensic practice, community engagement and advice on interaction with our Criminal Prosecution Service (CPS), this provided valuable Continuing Professional Development (CPD) for our detectives in particular. Secondly, our 'Focus On - IOPC: Ending victim blaming language in the context of violence against women and girls' was relevant not just to officers in force but anyone involved in communication around victim/survivors of violence. Again, the practical value of this has already been recognised, for example, by Chief Insp Paul Doyle who has used the input to upskill his staff in our Force Control Room who may take initial calls and provide onward reporting or messaging.

# **Cultural Audit**

8. As part of our proactive approach to mapping culture and behaviour within CoLP, Phase 2 of our cultural audit has now been completed with 87 officers participating in total, a report of key findings and next steps have recently been presented at our next Chief Officer Meeting. This outlined the methodology utilised, key findings and recommendations for next steps. In conjunction with feedback received following these initial discussions and next steps confirmed, this is being brought as a separate paper to our for PSIC review.

# ii. Key Issues, Risks and Mitigations

# **Evaluation Strategy**

- 9. The need for a meaningful evaluation strategy for our new workstreams has been acknowledged since its inception, we also understand that in order to achieve this we need to think 'smart'. As such, Professionalism and Trust have decided to approach the task holistically, advancing an opportunity to streamline our approach across a number of areas whilst maintaining consistency. This means that ownership will not sit purely with ICOD but will stretch across other key teams and will include, but is not limited to, evaluation of:-
- Our Inclusivity Programme modules
- Our Police Officer and Staff Training Courses (both mandatory and optional)
- Our Police Leadership Programme
- Other EDI initiatives and interventions (for example, listening circles).
- 10. Currently our evaluation methods are basic we send out surveys following events as listed above, but rarely do we follow up around behaviour change or embedded learning. This is vital if we are to understand the effectiveness of our inputs and whether we are achieving our force aspirations and priorities.
- 11. As it stands, we provide an extensive portfolio of courses across L&D and ICOD, every officer in CoLP will spend at least 5 days each year completing mandatory training as a minimum. Each package differs significantly including trainer style, curriculum content, learning method and structure. There is no comprehensive capture of this information, we rely on limited feedback and ad-hoc comment to assess the effectiveness of our inputs.
- 12. We have made the creation of an Evaluation Strategy as a priority for 2025, we appreciate that we are not experts in this field so are working with colleagues in academia to plan this. To date, we have identified the following as potential areas for scrutiny:-

Trainer Competence (to consider their skills, capability, knowledge)

*Internal Course evaluation* (to check relevance, accuracy, organisational needs, alignment with College of Policing)

*External Course Evaluation* (to include cost, 'CoLP' context and business needs)

**Behavioural Change over time** (what is being done differently as a result of the input received and cost/benefit analysis)

Community Evaluation (how to our public and communities feel as a result)

13. We are also in the process of mapping available methods of evaluation, these include classroom observations, in-course feedback questionnaires, post-course feedback, in-role observations, workbooks / follow up activities to demonstrate embedded behaviour change, professional discussions and

exams/knowledge checks. Once our mapping activities are completed later this month, we will be able to make a series of recommendations for future implementation. This will include clear Key Performance Indicators (KPIs) set out against data that can record impact.

# Delivery of National Black Police Association (BPA) Conference October 2025

- 14. CoLP are excited to announce that we have been selected as the host force for this event later in the year. This presents an excellent opportunity for CoLP to showcase both local and National BPA membership, improve awareness of issues impacting black and other ethnic minority groups, as well as helping improve trust and confidence in Policing at all levels.
- 15. A Planning Committee has been created and the first meeting took place on 19<sup>th</sup> December, we were pleased to welcome attendees from both local and National BPAs as well as from Essex Police (who hosted the event last year) to ensure we are incorporating lessons on worked well and what could be improved for 2025. Our focus currently is on confirming a venue and dates so that we can publicise these to our partners, we will be expecting representatives from all forces and around 350 attendees in total. Following this, we can then focus our attention on content, themes and speakers.
- 16. In addition to the size and scale of the event, we also expect challenges around our history within the City and links to slavery, but we will continue to work with our black colleagues to plan how we treat with sensitivity whilst also 'owning' our past and showing our progress and future commitment. We will also need to be mindful of the National feeling in policing around recent events, including the shooting of Chris Kaba, which has created strong feeling- significantly with some of our specialist officers in London. Again, this is where open conversation with our BPA colleagues and early consideration of such issues will be key to successful delivery.

# **Staff Network Review**

- 17. At our January EDI Strategic Board, a paper was presented which sought to equip our network members with access to the best practice and provide support for network activity in order to help drive positive culture change. This came about following a request from our networks for more clarity around procedures and processes supporting their management and delivery in CoLP, previously listed as a 'risk' at this Committee. ICOD conducted benchmarking activities with other forces to better understand the support that networks require and how we can enhance opportunities for effective working to improve our outcomes.
- 18. As a result of this review, a number of recommendations were recently approved, in summary:-

*Incorporation of Networks*: A force structure for our networks to be implemented in line with all protected characteristics (as per UK Equality Act 2010), each to complete its own Terms of Reference to provide a clear understanding of objectives/roles

**Protected Time:** An increase in protected time for Executive Committee members to a maximum of 32 hours per month and for Active members an increase to a maximum of 12 hours protected time per month. Line managers will be expected to positively consider supporting any additional abstraction, subject to operational and business requirements. A monitoring framework is being created so that both members and supervisors are able to record and assess the impact and value of network activities.

*Training:* To ensure that network members have the skills and knowledge required to deliver in accordance with the Equalities Act, further training courses (at CMI Level 4-6) to be arranged for 2025.

*Finance:* An annual budget submission from each network to apply for funding activities and accompanying log of all activities attended throughout the financial year, including learning imparted (to also assist with Personal Development Reviews).

**Best Practice:** Our networks to be consulted when new policies and procedures are developed or reviewed.

19. In implementing these recommendations, we are confident that our networks can evolve into robust, strategic assets that not only support individual wellbeing but contribute to the forces mission in becoming one of the most inclusive and trusted forces in the UK.

# iii. Forward Look

# **Inclusivity Programme**

- 20. In relation to future Inclusivity Programme modules, we continue to respond to what people are telling us (whether that be via our staff survey, cultural audit or organisational learning) and ensuring the modules we deliver are relevant to identified themes and have practical value. We have modules planned for this quarter of 2025 as follows:-
- Lawrence Davies LLM presenting on black justice (following his presentation at the National Black Police Association Conference).
- LGBTQ+ parenting event in partnership with Pricewaterhouse Coopers
- Time to Talk / Mental Health awareness session
- Ethics Panel- Transitioning and gender fluid officers and staff
- ICOD team continue to deliver sessions on 'active bystander' and 'ethical dilemmas'
- Single parent support / awareness (in planning stages)
- Focus on Bipolar (in planning stages)
- 21. As we continue to professionalise our programme, we have also worked with our Staff Networks and Associations to create a forward-planning diary of

events, ensuring that our modules are promoted in advance and are aligned, as appropriate, to significant dates in our EDI calendar.

# **Code of Ethics Delivery**

- 22. Under our new lead in this area, we continue to work closely with the College of Policing on this workstream, hosting a visit from Senior Leaders at the end of last year where they attended a Code of Ethics workshop. The workshop allowed them to meet with colleagues (including our new student officers) to gain an insight in to their understanding of the new Code and what it means in practice and also helping us to increase awareness within our own force.
- 23. In our ambition to bring the Code 'to life' in force and act as a testing ground for ethical dilemmas, ICOD are in the process of creating an internal 'Ethics Committee' to be responsible for enhancing trust and confidence in the governance and actions of the City London Police. We know from benchmarking with other forces that such initiatives have a positive impact on daily decision-making and have enabled policing colleagues to challenge in a constructive manner. Our cultural audits have shown that we need to further embed standards of behaviour, our Ethics Committee will support this aim by identifying organisational improvement opportunities to promote our core values of Professionalism, Integrity and Compassion.
- 24. Terms of Reference for our Ethics Committee have been drafted with objectives as follows:-
- Promoting high standards of ethical conduct in accordance with the Code of Ethics.
- Embedding ethics at the heart of organisational decision making
- Providing a focus for education and understanding around ethical issues.
- Scrutinising Force values and their application.
- Encouraging discussion within and outside of the organisation, promoting a culture of inclusion and ethical standards.
- 25. As we continue to develop our work on this piece, we are cognisant of the need to measure impact and promote organisational learning; as part of this we are linking in with an existing Regional Ethics Committee as well as including in our Evaluation Strategy.

# Police Leadership Programme (PLP)

26. The PLP has been designed by the College of Policing to provide a comprehensive leadership development journey for the whole career of anyone working in policing. The Programme focuses on five levels of leadership from foundation/entry level to executive leaders and our work within CoLP to ensure effective delivery continues at pace.

- 27. The Force is part of an NPCC pilot, partnering with Durham University and four other forces, who have collaboratively designed a programme mapped to the College of Policing's curriculum for first and mid-line leaders. The Programme is mandated for all officers, police staff and volunteers in target ranks and grades, whether newly promoted or experienced within those staffing groups. It covers both leadership and management development and includes the following modules: inclusive leadership, personal leadership, operational and work-based leadership, organisational leadership, leading partnerships and coaching and mentoring.
- 28. The Programme will be delivered over five days, with two days being focused on COLP specific management practices and policy. Director/Service Leads within Corporate Services have been consulted and will provide inputs, including strategy and governance, Human Resources, Change, Information Management and Professional Standards.
- 29. Learning and Development are running a pilot at the end of February with full roll out from April 2025.

# Conclusion

30. In conclusion, the City of London Police continues to advance its commitment to equity, diversity and inclusion through a strategic and systematic approach. The progress made in delivering the EDI Strategy Implementation Framework, including the prioritisation of initiatives and measurable outcomes, reflects a proactive and collaborative effort to embed inclusivity into the core of the organisation. With ongoing development of the Inclusivity Programme, preparation for the National Black Police Association Conference, and enhancements to staff networks and leadership initiatives, the force is not only addressing immediate priorities but also laying the foundation for sustainable change. These efforts, supported by robust evaluation strategies and ethical leadership frameworks, reinforce the Force's mission to be one of the most inclusive and trusted police services in the UK.

# Appendices

- Appendix 1- EDI Strategy Implementation Plan and Framework
- Appendix 2 EDI Delivery Milestones
- Appendix 3 Inclusivity Programme Evaluation

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# **EDI Strategy Implementation Delivery Plan**

# Year 1: January 2025 – March 2026

#### 1. Introduction

This paper aims to set out the Year 1 EDI priorities which the City of London Police are committing to as part of our new EDI Strategy, providing rationale for our selection, proposed timeframes for completion alongside metrics to demonstrate progress. It is important to note that, prior to publication, during and since, our delivery of initiatives in this area has not slowed pace. However, we have recognised the need to map out our priorities and measures to ensure a focused delivery.

#### 2. Background

Following the launch and publication of our EDI Strategy in July 2024, the Inclusivity, Culture and Organisational Development (ICOD) team have consulted widely, both internally (with our Staff Networks and Associations) as well as with key external partners, to identify our next steps. This has allowed us to prioritise the areas which we know are most important to our stakeholders, but also incorporate feedback from Inclusive Employers following our recent submission and 'Silver' award. We have also given due consideration to our National policing requirements (as set out by both the College of Policing and the National Police Chief's Council), as well as acknowledging our legal obligations.

In doing so, we have been able to provide tangible actions against each of the published 'Commitment' statements from the four sections of the strategy (Our People, Our Policies, Our Public and Our Partners) which set out how we will go about achieving progress. Working collaboratively, we have been able to decide which actions are a priority for us and apply some realistic timeframes. In acknowledging that much of the co-ordination and drive behind many of these actions will come from the small team of ICOD, we have had to think carefully about what can be achieved and the commitment involved. To provide clarity on milestones, the following status matrix has been mapped against each action over a 3 year period as either:-

Developing	Project / initiative is underway or in planning stages but not yet delivered
Achieving	Project / initiative has been delivered at base level but not evolved further
Advancing	Project / initiative has been delivered and has reached a sophisticated stage (for example, gone a step further by informing National innovative practice)

This methodology replicates that used by the College of Policing, with the aim of ensuring consistency of approach. We have also ensured all of our proposals are aligned to our forthcoming Policing Plan priorities, with our core values of Professionalism, Integrity and Compassion suitably reflected. The governance of this implementation plan is also going to be crucial, our recent review of internal governance provides a platform for us to hold ourselves to account (through our EDI

Strategic and EDI Delivery Boards). We understand that we also need to apply scrutiny from outside formal governance and will do so through mechanisms such as our Independent Advisory Scrutiny Group (IASG); they have been consulted and provided feedback as we have worked towards this plan.

This paper will now provide an overview of our Year 1 workplan, for each part of the Strategy we have selected our Commitment Priorities and the Deliverables against each one. As one might expect, a significant majority of these relate to 'our people', acknowledging that so much focus in Policing currently is around standards of culture and behaviour. We have then selected the most appropriate measures from those which we have listed within our Strategy; again, we have made considered selection based on availability/quality of data alongside relevance. Going forwards, once we have established our baseline measures, we will be able to add in more meaningful goals or targets.

It is important to note that in addition to our EDI delivery, there are broader things that we are doing that are not referenced specifically within this plan- for example, hosting this year's NBPA Conference, reviewing and refreshing our VAWG Strategic Plan. Future iterations of this plan will endeavour to incorporate this additional activity- as a force, we appreciate that there will always be a degree of flex as and when new themes or priorities emerge.

#### 3a) 'Our People' Year 1 Commitments

- Increase the diversity of underrepresented talent from all backgrounds (within student officers intakes and) at all levels of our service.
- We will complete audits every quarter and use the results of these to inform changes in culture, the content of our inclusivity programme and professional standards work





#### 3c) 'Our People' Year 1 Deliverables

This is by far our largest 'P' in terms of deliverables, but also our significant focus in Year 1. This is in part due to our statutory and legal obligations- we need to publish our Annual Public Sector Equality Duty by April of each year and in addition to our gender pay gap, best practice suggests that forces should also include analysis of pay gaps between other groups i.e. race.

We know that improving our diversity must be a priority and is the focus already of much of our work in this area. As HR finalise their workforce plan, they are linking in closely with ICOD and other internal stakeholders to ensure that our recruitment strategy is able to deliver in this area. This is also a priority for many of our additional workstreams within ICOD, including our Police Race Action Plan and recommendations following both the Casey Review and Angiolini Inquiry. Alongside this, it is vitally important that we improve our internal data capture, including the make-up of our current workforce. We need to ensure that our officers and staff not only have access to update their private information but also that they are regularly encouraged and motivated to do so. Hence, this has been allocated as a separate piece for one of our SMT leads as part of his Police Executive

Leadership Programme (PELP) supporting evidence, alongside our work within ICOD and Internal Communications.

A number of projects are already underway, including our Positive Action Leadership Scheme (PALs), Cultural Audit, Staff Survey, Leadership Training, Sponsorship and Inclusivity Programme. It is important that this delivery continues but we recognise that we must better understand the impact that these initiatives are having. As such, we are committed to investing more in this area, hence focusing on developing a more sophisticated evaluation strategy during Year 1. These will continue to be delivered by ICOD, but we understand that we will need to utilise the expertise of others, in particular our peers and partners who already have effective evaluation mechanisms in place.

#### 3d) 'Our People' Why is this important?

We recognise the importance of these areas as they help us to build towards a gold accreditation with inclusive employers and fulfils our strategic aim of being one of the most inclusive forces in the Country. We understand the need to record and measure the impact that these initiatives are having, to support our people. Alongside this, we are fully aware of our statutory obligations. As such, we are committed to investing further in this area, hence focusing on developing a more sophisticated evaluation strategy during Year 1.

#### 3e) 'Our People' Year 1 Measurement

- Recruitment, retention and promotion / development figures of all people, with special focus on those from minority backgrounds
- A decrease in the number of complaints received
- A decrease in the number of cases of discrimination, bullying or similar
- Year-on-year progress in percentages of our people declaring their differences
- Improved assessments results of our culture, both qualitatively and quantitatively

#### 4) Prioritisation and Delivery- Our Policies

#### 4a) 'Our Policies' Year 1 Commitment

• We will use our staff networks and associations as key partners in delivering inclusive and relevant policies and review these quarterly to ensure their effectiveness

#### 4b)



#### 4c) 'Our Policies' Year 1 Deliverables

We will review our Equal Opportunities Policy and **all** policies relating to bullying / harassment, including external examination to ensure that we are viewing appropriately through an 'EDI' lens. These activities will be led by ICOD, utilising our existing networks and scrutiny groups. We will also be seeking out National good practice in Policing to learn from those who are already advancing in this area.

We have recently completed a review of our Staff Networks and Associations, implementing recommendations relating to dedicated time for activities, governance, budgeting and training. Through continued delivery of our Network Chairs Meetings and ongoing support, ICOD will ensure that our people remain key consultants in any new policies or procedures

#### 4d) 'Our Policies' Why is this important?

We have a legal obligation to ensure our policies are fit for purpose, this was highlighted by our feedback from Inclusive Employers. By including our networks and external scrutiny groups in this process, we have a broad and informed perspective to grow our organisation in the most inclusive way. This stakeholder engagement increases internal and external trust and confidence in our service.

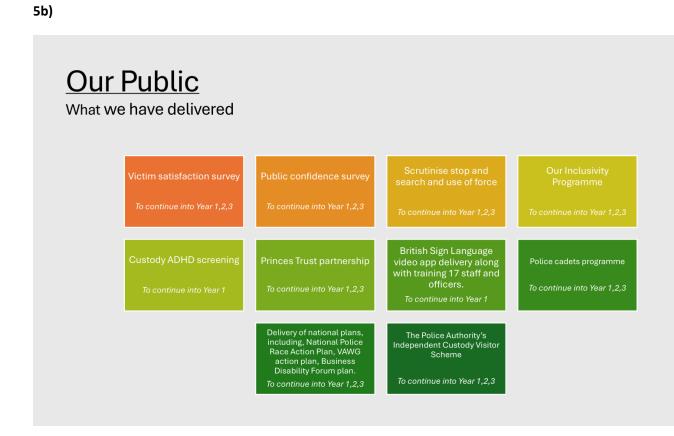
#### 4e) 'Our Policies' Year 1 Measurement

- Completed review of key policies as detailed above, numbers to be provided and qualitative changes to be tracked
- Gender and Ethnicity Pay Gap reporting to provide insights into progress made on equitable pay structures
- Our staff networks and associations invited to inform, contribute and shape policies that impact our people (as per monitoring form template- to include numbers of policies reviewed, time spent and overview of changes made)

5) Prioritisation and Delivery- 'Our Public'

5a) 'Our Public' Year 1 Commitment

• We will engage positively with young people throughout London so that our young people meet and take part



#### 5c) 'Our Public' Year 1 Deliverables

ICOD has, as of January 2025, taken ownership of our Youth Independent Advisory Group (YIAG). There is much to do to ensure effective member engagement and involvement going forwards. As such, we expect a significant bulk of our Year 1 Public focus to be on developing this group and maximising its impact and effectiveness. Similarly, we will work with colleagues in Local Policing to ensure connectivity and shared best practice between the YIAG and our Police Cadets and more general youth engagement. This will ensure effective governance, reporting and evolution of existing activity.

Again, all three of these actions cut across many of other workstreams including our National Action Plans on Violence Against Women and Girls (VAWG) and Race.

Finally, a high priority for ICOD remains a review of all existing National Plans, including EDI-related reports and recommendations, to ensure appropriate governance, co-ordination, delivery and reporting.

#### 5d) 'Our Public' Why is this important?

Public engagement and scrutiny are key to being a transparent and reflective service, one that is keen to learn and grow. We can only understand the reality of our service delivery by engaging with the pubic, listening and understanding. Establishing diverse and reputable relationships will help to build a fully accessible and embracive force. This is fundamental in our bid to become one of the most inclusive police services in the country.

#### 5e) 'Our Public' Year 1 Measurement

- Survey results and reporting relating to Public Satisfaction- specifically metrics contained as per our Public Confidence Survey ('confidence in CoLP doing a good job' AND 'how safe do you feel')
- The number of consultations taken place with our communities

6) Prioritisation and Delivery- 'Our Partners'

#### 6a) 'Our Partners' Year 1 Commitment

• We will ensure we can measure the impact of our partnership work, review its progress, and build on outcomes

#### 6b)

What we have delivered			
Mentivity	Inclusive Employers	Operation Reframe, includes licensed premises, The Corporation, Safer Business	Ethical Dilemma Trainir
To be continued in Year 1	To be continued in Year 1,2,3	Network, The Samaritans and the SIA (security staff) <i>To be continued in Year 1,2,3</i>	To be continued in Year 1
Walk and Talk and Ride Along Scheme	The 'Be Lads' safety campaign	'Focus On' sessions – external speakers from a range of diverse cultures, understanding lived experiences	Network of Women has introduced young wome careers within the servi
To be continued in Year 1,2,3	To be continued in Year 1	To be continued in Year 1,2,3	To be continued in Yea

#### 6c) 'Our Partners' Year 1 Deliverables

In our first year, it is proposed that we focus on achieving a clear understanding of our existing partnerships across the force. Alongside this, we also need to get a better understanding of our existing procurement frameworks- both what exists locally and Nationally (including any National Policing guidance / best or innovative practice).

ICOD are also committed to our ongoing Code of Ethics Delivery, including our Ethical Dilemmas training and the establishment of an Ethics Committee. Although this action stretches across all 4 pillars of work, there is a clear link with ethical partnerships, hence incorporation at this point.

#### 6d) 'Our Partners' Why this is important?

Albeit the new Code of Ethics in Policing is non-statutory, it is the expectation of the College of Policing and the National Police Chief's Council that all forces will ensure their staff have a grounded understanding of its principles and will use these collectively across the business to support decision making and guide behaviour. The new Code of Ethics highlights a commitment to work in the public interest, listening to the needs of the public we serve and standing up against any behaviour or attitudes that could bring the profession into disrepute and damage trust in the service. To be a trusted and valued service, we must act lawfully; understand and respond to community needs; ensure that our partnerships are ethical; reflect on and apply knowledge and experience; and improve ourselves, our peers and our profession. These behaviours align with our force values of Professionalism, Integrity, and Compassion.

#### 6c) 'Our Partners' Year 1 Measurement

- Number and quality of partnerships formed across all areas of our service delivery,
- Number of attendees on ethics related training (to include Ethical Dilemmas) and Number of Ethics Committees held.

# EDI Strategy Implementation Framework

# 2024-2027

No	Commitment Summary	Action required / Deliverable	Co-ordinator	Priority	Status	Year 1	Year 2	Year 3
		Pledges to be written and announced by all of CoLP Senior Leadership Team	ICOD	High	Completed	Achieving	Achieving	Achieving
		Review of pledges to take place by ICOD	ICOD	Medium	In progress		Achieving	Achieving
		To be an ongoing agenda item at EDI Strategic Board, progress to be monitored	ICOD	Medium	Not started		Achieving	Achieving
1.1	Introduction of pledges from senior leaders that they are accountable for delivering	The role of 'Champions' for Staff Networks to be formalised with clear roles and objectives. This will make it easier to define accountability lines and monitor / evaluate impact	ICOD	Low	Not started		Developing	Achieving
1.1	denvering	Creation of recruitment strategy which reflects the commitments made at 1.2a and 1.2b	HR	High	In progress	Developing	Developing	Achieving
		Review of previous talent strategy and creation of new plan (see also action at 2.4)	ICOD	Medium	Not started		Developing	Achieving
	Increase the diversity of underrepresented	Delivery and Evaluation of Positive Action Learning Scheme	ICOD	High	In progress	Developing	Achieving	Achieving
	talent from all backgrounds within	Delivery of Sponsorship Scheme for those from minority backgrounds	ICOD	High	In progress	Developing	Achieving	Achieving
1.2a &	student officers intakes and at all levels of our	Ensuring that existing programmes to support future leadership are available to all diverse						
1.2b	service.	groups within CoLP	ICOD	Low	Not started		Developing	Achieving

	Evaluation of existing programmes to measure						
	impact and 'success' rates for our diverse	ICOD	Medium	Not started		Developing	Achieving
	groups	ICOD	Weulum	NOUSIAITEU		Developing	Achieving
	Retention and Exiting Workgroup created with						
	programme of work in place	DCS NLF (Ops)	High	In progress	Developing	Achieving	Achieving
	Delivery against statutory requirements						
	(including Public Sector Equality Duty)	ICOD	High	In progress	Achieving	Achieving	Advancing
	Ensure that staff can update their diversity data		0	In progress	Ŭ	0	0
	at any point through the self-service system						
	and that this is collected at key stages in the						
	employee lifecycle- onboarding, promotion etc.						
	Aim to increase disclosure rate to 75%						
	(recommend options are presented	DCS NLF / HR /					
	alphabetically to avoid implied hierarchy)	ICOD	High		Developing	Achieving	Achieving
	Ongoing monitoring of recruitment, promotion						
	and retention data via EDI Strategic Board	ICOD / HR	High	In progress	Developing	Developing	Achieving
	Inclusion of 'attraction' data	HR	Low	Not started		Developing	Achieving
	Plan created to address poor disclosure rates	DCS NLF					
	relating to protected characteristics	(NFIB/AF)	Medium	In progress	Developing	Achieving	Achieving
	Consider using both qualitative and						
	quantitative data to understand career						
	aspirations across different demographic						
	groups, addressing barriers and creating more						
	career-enhancing opportunities for						
	underrepresented groups	All-tbd	Low	Not started		Developing	Achieving
Consistent delivery of	Creation of Inclusivity Programme as						
, regular mandatory	mandatory for all CoLP Officers and Staff	ICOD	High	Completed	Achieving	Achieving	Advancing
education on a variety	Creation of calendar, in consultation with						
of subjects pertinent to	networks, to inform activity	ICOD	High	In progress	Achieving	Achieving	Advancing
the cultures and lived	Ongoing delivery of content and consistent						
experiences of our	evaluation	ICOD	High	In progress	Developing	Achieving	Achieving

1.3

1	people, partners and	Sophisticated evaluation plan in place to ensure						
	public	'impact' is measured	ICOD	High	In progress	Developing	Achieving	Achieving
		Explore strategies to increase officer						
		participation in the Inclusivity Programme						
		which will help achieve broader impact and						
		foster greater cultural change	ICOD	Medium	Not started		Developing	Achieving
		Explore ways to implement evaluation methods						
		that effectively capture the impact of events						
		organised by staff networks	ICOD	Low	Not started		Developing	Achieving
		Content and Timetable for leadership training						
		to be agreed	ICOD / L&D	High	In progress	Developing	Achieving	Advancing
		Ongoing delivery of staff survey (including pulse						
		surveys) and actions / communications from						
	Ensuring that all leaders	these	ICOD / L&D	High	In progress	Achieving	Achieving	Achieving
	working for us complete	On an inclustion and manitoring of						
	mandatory and regular	Ongoing evaluation and monitoring of		N de alivina	Not started	Developing	A abia via a	A du como ino a
	inclusive leadership	effectiveness, to link in with SLT pledges	ICOD / L&D	Medium	Not started	Developing	Achieving	Advancing
	training. This will be	Review of staff survey to be undertaken to		Laur	Not started		Developing	A shi suin s
	regularly reviewed	capture effectiveness	ICOD / L&D	Low	Not started		Developing	Achieving
	through relevant	Ensuring our SLT are attending Inclusivity						
	metrics, including our	Programme modules, compliance to be		1	N a tarta ata ata al			Developing
1.4	staff survey	monitored through PDR	ICOD / L&D	Low	Not started			Developing
		Communication to be sent across the						
		organisation that inclusivity objectives are now	laterne el					
		mandatory as part of PDR and promotion	Internal	Llink	Completed	Ashisuing	A abia via a	A shi suin s
		processes	Comms	High	Completed	Achieving	Achieving	Achieving
		Compliance to be monitored / reported and						
	We will introduce	individuals held accountable (through PDRs,						
	inclusivity objectives	performance reviews, appraisals and reward		N de alivina	Not started		Developing	A shi suin s
	into professional	systems)	ICOD / HR	Medium	Not started		Developing	Achieving
	development reviews to	Consideration to be given as to how to reward /						
1 -	drive individual	recognise efforts made by active SNA members	ICOD	N de alivira	Not starts -		Develorin-	A abieving
1.5	accountability	and Executive Officers	ICOD	Medium	Not started		Developing	Achieving

1	Leverage the value of							
	our PSD to monitor							
	complaints and							
	feedback we receive on							
	our service and use our							
	new investment in							
	technology to record	A paper to be produced, outlining existing						
	and address these in a	processes, highlighting gaps in delivery and						
	timely manner and with	making recommendations for future action /						
1.6	empathy	investment	PSD	Low	Not started		Developing	Achieving
		A cultural audit process to be designed and						
		agreed; pilot to then be undertaken	ICOD	High	Completed	Achieving	Achieving	Advancing
		Reporting on the cultural audit to be shared						
		internally and externally to agree on a)						
	We will complete audits	effectiveness of pilot, and b) next steps	ICOD	High	In progress	Achieving	Achieving	Advancing
	every quarter and use	Review of reporting on culture to take place- do		<u>y</u>		<u> </u>	0	<u> </u>
	the results of these to	we have sufficient mechanism for 'low level'						
	inform changes in	reports ie when people don't want to make						
	culture, the content of	formal complaints	PSD	Medium	Not started		Developing	Achieving
	our inclusivity	Process to be put in place for quarterly audits /						
	programme and	sense checking in relation to culture, including						
	professional standards	a mechanism to inform IP modules and						
1.7	work	organisational learning.	ICOD	Medium	In progress	Developing	Achieving	Achieving
	We will embed							
	recommendations from	Benchmarking exercise to be undertaken to	ICOD /					
	all national policing	ensure we have captured all relevant national	Strategy &					
	plans and working	policing plans	Planning	Low	Not started		Developing	Achieving
	together with PSD,							
	victim satisfaction and							
	use of force monitoring	Review of relevant national policing plans to	ICOD /					
	teams, ensure expected	extract relevant recommendations and ensure	Strategy &					
1.8	high standards are met	embedded within our own EDI frameworks	Planning	Low	Not started		Developing	Achieving

No	Commitment Summary	Action required / Deliverable	Co-ordinator	Priority	Status	Year 1	Year 2	Year 3
	We will establish							
	partnership standards to		ICOD /					
	ensure we can receive	Benchmarking / external consultancy around	Strategy and					
	and review feedback	'partnership standards'	Planning	Low	Not started			Developing
	from the public and our	Decide on ownership of / process for any public						
	partners and share this	feedback mechanism	ICOD	Low	Not started			Developing
	with internal	Communicate internally with requisite						
	stakeholders to create	governance in place for monitoring (i.e. via						
2.1	new ways of working	OLF)	ICOD	Low	Not started			Developing
	We will monitor the	Add this topic to the agenda of both IASG and						
	effectiveness and impact	YIAG for consultancy	ICOD	Low	Not started		Developing	Achieving
	of our IASG and YIAG,	Creation of plan to monitor influence and						
	through our internal and	impact, including how this will be reported						
2.2	public reporting metrics	both internally and externally	ICOD	Low	Not started			Developing
		Completion of review of Staff Networks and						
		Associations, taking forward recommendations						
		to board for decision	ICOD	High	In progress	Achieving	Achieving	Advancing
		Identify all relevant policies and their owners,						
		putting plan in place to review through EDI lens	ICOD /					
		(to include external scrutiny / National best	Strategy and					
		practice)	Planning	Medium	Not started		Developing	Achieving
	We will use our staff	Undertake review and ensure effective						
	networks and	monitoring via EDI Strategic Board	ICOD	Medium	Not started		Developing	Achieving
	associations as key		ICOD	Weddun			Developing	Achieving
	partners in delivering	Use of data on career progression, linked to pay						
	inclusive and relevant	gap analyses, and conduct an EIA on rank pay						
	policies and review these	criteria / policy to identify any potential						
<b>.</b>	quarterly to ensure their effectiveness	disadvantages for certain groups and develop		Low	Not started		Doualanin-	Achiovir
2.3	enectiveness	positive actions to address these.	ICOD/HR	Low	Not started		Developing	Achieving

		Review of all policies relating to bullying, harassment and grievances (as identified per IE 'quick win' feedback), ensuring ALL staff have adequate training	ICOD/HR/PSD	Low	Not started	Developing	Achieving	Achieving
		Review of Equal Opportunities Policy to include	1000/110/130	LOW	Not started	Developing	Achieving	Achieving
		what happens if breaches occur, the available support and accountability measures in place						
		(as per IE feedback)	ICOD/HR/PSD	High	No started	Achieving	Achieving	Advancing
		Creation of talent strategy which will include						
		detail required at 2.4 (see also action at 1.2a)	ICOD	Low	Not started		Developing	Achieving
	We will track the	Review the content of the Upcoming Police						
	progression of talent	Leadership Programme / consider creating						
	through robust and	tailored input or separate inclusive leadership /						
	impartial development	talent management training programme to						
2.4	platforms and processes	complement it	ICOD	Low	Not started		Developing	Achieving

3) (	OUR PUBLIC							
, No.	Commitment Summary	Action required / Deliverable	Co-ordinator	Priority	Status	Year 1	Year 2	Year 3
	We will engage positively with young people throughout London (whilst	Youth IASG to be led by ICOD as part of new workstream, handover to take place and programme of activity planned	ICOD / LP	High	In Progress	Developing	Achieving	Achieving
	also offering our unique skills and training to all	Programme of engagement with young people to be led by LP	LP	Medium	In Progress	Developing	Achieving	Advancing
	police cadets across the UK), so that our young people meet and take part	Programme of police cadet activity to be promoted and monitored	LP	Medium	In progress	Developing	Achieving	Advancing
3.1	in peer-to-peer teaching and learning	Evaluation and impact measurement	ICOD / LP	Low	Not started		Developing	Achieving
	We will implement regular victim satisfaction surveys to assess and measure the effectiveness and	Review of existing victim satisfaction survey / metrics, including content and timeliness	Strategy & Planning	Medium	Not started		Developing	Achieving
		Adapt / external review to ensure EDI angle fully captured within our surveys	Strategy & Planning	Low	Not started		Developing	Achieving
3.2	professionalism of our services	Report findings both internally (into EDI Strategic Board) and externally via Corporation	Strategy & Planning	Low	Not started		Developing	Achieving
	We will ensure the	A review to take place of all National plans, including mapping of demand for delivery	ICOD / PSD	High	In progress	Achieving	Achieving	Advancing
	National plans that promote trust and confidence are embedded	Clear ownership and reporting mechanisms agreed for above (including Casey and Angiolini)	ICOD / PSD	High	In progress	Achieving	Achieving	Advancing
	in our policing activities and provide metrics to measure their success	Ongoing monitoring via internal governance and external assessment	ICOD	Medium	Not started	Developing	Achieving	Advancing
3.3		Ensuring embedded throughout activity as part of IE standard	ICOD	Low	Not started	Developing	Achieving	Achieving
3.4		Review of existing engagement methods both internally and externally	Internal Comms	Low	Not started	Developing	Achieving	Achieving

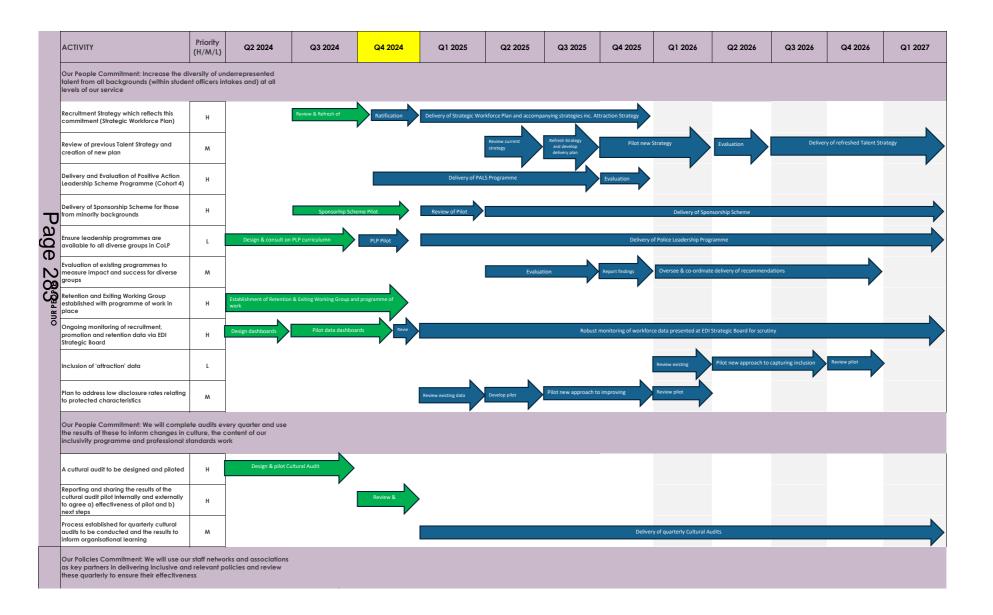
	We will engage in an accessible way with all of	Recommendations to follow	Internal Comms	Low	Not started	Developing	Achieving	Achieving
	our communities	Independent scrutiny of engagement plan to	Internal					
		take place via IASG and EDI specialists	Comms	Low	Not started	Developing	Developing	Achieving
	We will ensure our							
	complaints processes are							
	robust and offer a prompt							
	way for us to efficiently							
	respond to the views and							
	needs of our people,	Review of existing complaints process to take						
3.5	public and partners.	place and recommendations to follow	PSD	Low	Not started		Developing	Achieving

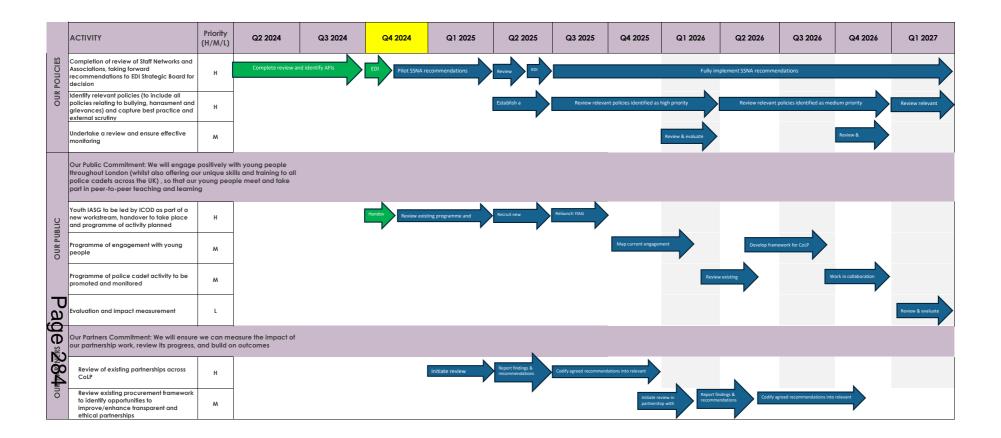
# 4) OUR PARTNERS

No.	<b>Commitment Summary</b>	Action required / Deliverable	Co-ordinator	Priority	Status	Year 1	Year 2	Year 3
4.1	We will ensure we can measure the impact of our partnership work, review its progress, and build on outcomes	Review of existing partnerships to take place to establish 'as is' position (alongside basic review of procurement framework / ethical processes)	ICOD	High	Not started	Developing	Achieving	Achieving
		Review existing procurement framework to identify opportunities to improve/enhance transparent and ethical partnerships	ICOD	Medium	Not started	Developing	Developing	Achieving
	We will work in partnership with the Corporation Procurement	Detailed review of existing framework- both with Corporation and through identification of National best practice	Strategy & Planning	Medium	Not started		Developing	Achieving
4.2	Department to proactively identify and introduce partners from a diverse range of backgrounds in	Work with stakeholders to identify best practice and build into plan to improve framework	Strategy &	Lev.				Developing
4.2	our supply chain We will facilitate	Establish supplier baseline / current picture via review	Planning CSD	Low	Not started		Developing	Developing Achieving
4.3	opportunities to proactively bring diverse suppliers	Create plan to maximise opportunities for future ethical / diverse partnerships with our suppliers	CSD	Low	Not started			Developing
4.4	We will build on these efforts and create additional plans in the areas where we still	Links to wider delivery of Code of Ethics- both internally and promoting efforts v ethics committee.	ICOD	High	In progress	Developing	Achieving	Advancing



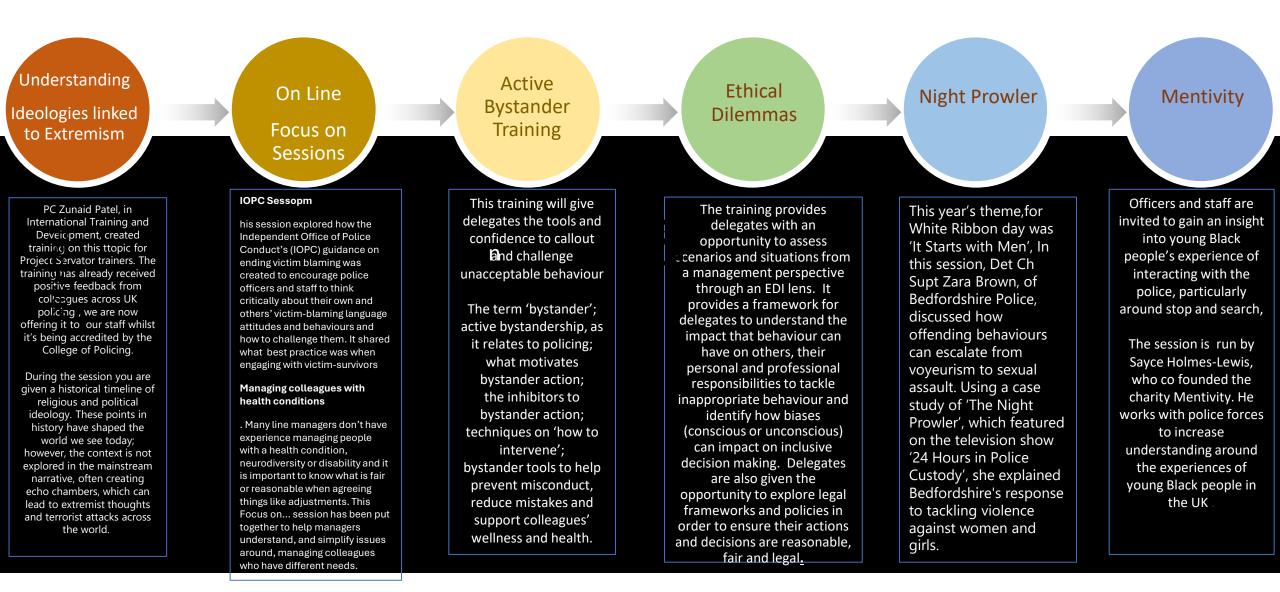
# **EDI Year 1 Priorities and Delivery Timescales**





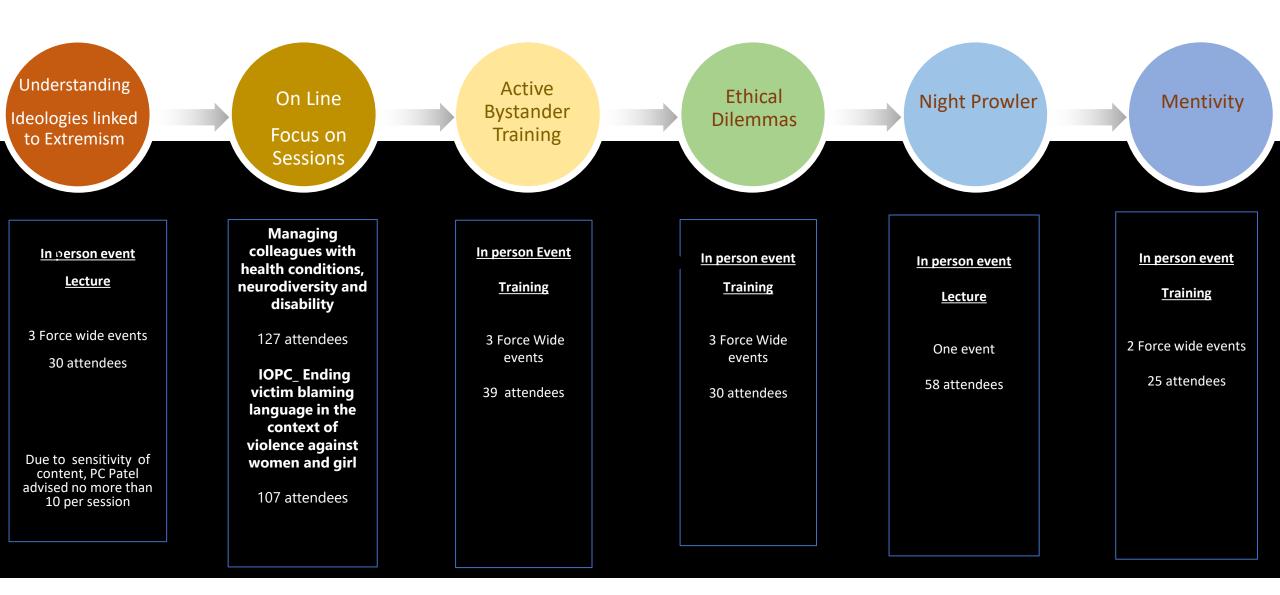
# **Our People - Inclusivity Programme modules – Oct – Dec 2024**





# **Our People - Inclusivity Programme modules**





# Understanding Ideologies Linked to Extremism



Zunaid's input was one of the most informative I have heard on this subject His combination of Islamic history, political context and explanation of Islamist extremism taught us many things and filled many much needed gaps in our knowledge.



Thank you very much for your time and the extremely interesting presentation on extremist ideology. The context and importance of the history and how it has been distorted is not only interesting but useful for establishing mindset of those we stop during resolution conversations

These sessions will continue from April 2025 when PC Patel returns from his training commitments Focus on IOPC: Ending victim blaming language in the context of violence against women and girls.n

#### What did you find most useful?

- The distinction between the passive and active voice and how it can shift the focus of the action between a victim and perpetrator.
- The examples of passive and active voices. It showed the subtle biases of the person writing the report
- Understanding importance of using correct language when dealing with victims of serious offences how subtle changes can impact
- The concept of being more mindful when using language in statements/reports. Making sure the language used does not create subtle unintentional bias.
- How important the victims should be treated when they are reporting such an awful crime.
- Understanding the nuances that can shift blame away from offenders
- When they broke down the different ways of saying the same sentence, and how it can be perceived differently by other people
- I found the reference to the language we use when writing reports/casefiles about VAWG most useful as I will take it onboard in future.
- Thinking about using words more carefully is a good idea ensuring that the way something is phrased does not inadvertently infer that the victim is in some way responsible for getting assaulted (for example)
- I thought it might be police investigation focused but actually quite useful for report writing and strategy development in my job. Particuarly thinking about language you use for particular crimes, e.g. burglary vs rapes
- The emphasis on the use of language was thought provoking. It's a change in mindset from how investigators are taught to write a chronology of what took place and what actions each person took. By changing the way the narrative is written it could change how someone feels when reading it back.
- The importance of ending victim blaming as victim blaming language shifts blame away from the abuser and onto the victim.
- I found it useful to understand how our attitudes, and behaviours can impact victims and have examples was really helpful.
- I found the addressing of the subtleties around language very useful to see how small changes to nuance can make the difference

This session was recorded and will form part of the Contact Staff training programme



Focus On Managing colleagues with health conditions, neurodiversity and disability.



#### What did you find most useful?

I enjoyed hearing both the manager and staff speak side by side in each of the examples, not only was it truly authentic and frank but

it also helped me see the whole picture and re focus how I would potentially address this issue The personal stories and positive outcomes

The real life examples (although I appreciate the courage it must have taken to speak publicly) Clarification on the passport, it was good to hear from the supervisor point of view,

HRs myth busting regarding managing reasonable adjustments and the live examples The positive personal experiences from officers/staff really help to reinforce how effective communication

helps overcome perceived obstacles in the workplace.

The session was structured very well and easy to understand

Realising the (high) number of people who are aware of the issue

As a person who struggles with long term health conditions and chronic pain, I particularly enjoyed Steph's intervention

as it resonated with me quite a lot, as well as Alison's intervention regarding myths.

Both these parts have made me realise that I have not asked help and adjustments for the reasons they mentioned, which are "silly" because in the end it's my right to ask and I'm not damaging anyone by doing so.

Hearing about real examples first hand (the two "case studies") because it was positive about what can be achieved (and brave of those taking part)

This session will be followed up by he work HR are doing on reasonable adjustments

# Active Bystander



#### What did you learn?

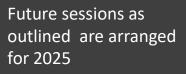
- · How to listen and potentially to challenge behaviour
- The importance of doing the right thing and calling out bad behaviour
- It was a useful reminder and interesting to hear different views and experiences
- Peer intervention doesn't have to happen then and there. It's okay to reflect and then deal with it slower time in a
  way that might be more appropriate.
- I learnt how to see the early signs of bad behaviour and will allow me to challenge obscure behaviour from colleagues.
- techniques of challenging inappropriate behavious
- Useful tips to engage with people in relation to poor behaviour
- I learnt not to be shy or hold back if someone acts inappropriately, but to do this in a friendly way where possible
- Different techniques on what to do to call out worrying behaviour.
- It reinforces professional practice within the workplace and sets a standard of acceptable behaviour.
- colleagues
- How to "call-in", diffuse a situation, stop things from escalating and in the process help my colleagues
- ways, but also given tools to step in with incidents not involving colleagues, just with people interactions in general

Further events are planned for 2025 . We will continue to deliver it as part of the Student Officer programme.

# Ethical Dilemmas



- "Never make assumptions and always question what you see and hear."
- "Will learn to listen and apply accordingly to avoid issues/ damages."
- "taking a step back from my own assumptions / perspective and taking a more considerate approach."
- "Will make me re-assess how I deal with people during meetings."
- "To pause and reflect, consider others' views before making a decision."
- " "To think first, look at other scenarios and don't jump to conclusions."
- " I found the dynamics of the group discussion very useful."
- " I learned about 'misophonia' everything new is valuable to me. "
- " The ladder of inference was interesting."
- " This was well facilitated"
- "The 5 levels of listening and the ladder of inference."
- "I learned about the ladder of inference; I will collect more information before making my decision."
- " to be open to consider options and that different options." Ladder of inference"
- " Different categories of solving dilemmas."
- " The 5 steps of listening will use more next one to one, either chair or receive."
- " Talk to people. Don't be afraid to talk solutions through and explore solutions."
- "Management of ethical dilemmas in a team."
- "Different methods of listening and having conversations, use the NDM in decision making actively."





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## Night Prowler

#### What did you enjoy about this session?

- Passing on help and knowledge to others
- The benefits of not focussing on reports in isolation
- Signs of escalating behaviours, wider police support units
- The approach to violence against women
- Understanding of latest issues in RASSO area. Improtance of data analytics
- How invaluable venues and their staff are for providing first accounts and vital information to assist convictions

**CITY** OF **LONDON** 

- Looking out for obvious signs and quick to react
- To look at investigations with a more holistic approach
- How important the security guard was to the victim. I would use this learning if someone needed help.
- The fact that you don't necessarily need lots of forensic work, ie DNA , fingerprints
- · As a new officer it exposed us to the complexity of investigating
- About the importance of VAWG awareness and pursuing cases even if the physical evidence is lacking.
- · The mistakes made in the past and to push for more patrols in the harder to reach areas
- I did not learn a lot unfortunately as even the questions we asked specifically for our department could not be answered.
- I learnt about Beds issues with cps and how they are trying to deal with the court situation going forward. I'm not sure I'll be able to use this tho.
- The importance of the security officer and how they cannot be ruled out for intelligence.

### CITY IONDON POLICE

#### What did you enjoy about this session?

- "The delivery and the passion showed by Sayce throughout the session."
- "Very wide ranging history from century ago to today.
- "presentation style, very approachable."
- "The presenter Sayce very interesting to hear personal experience and feedback he's received in the local community."
- "It was engaging and though provoking, not just someone talking at me which some courses are like."
- "it was informative and it was great to have non-judgemental space to discuss difficult topics."
- "Hearing the history of black people and how the history has shaped perceptions towards the police3. Also very open and honest discussions."

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

- "Origins of racism, understand and start from others experience and points of view."
- "An understanding behind why people from BAME/ diverse backgrounds face a sense or injustice and mistreat in policing."
- "I learned that there is still a long way to go in terms of improving relations between communities and the police."
- How our use of power has a positive or negative impact"
- " I learned to look at things from a different perspective, why young black males behave and feel the way they do if engaging with police."
- "Inform others should future sessions be ran, to attend." Good to know Sayce is a part of the Policing committee and hopefully we will see more informed decision making."

Future sessions arranged for 2025

These sessions are also part of the student officer induction programme

Mentivity

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<b>Committee(s):</b> Strategic Planning & Performance Committee Police Authority Board	Dated: 11 February 2025 12 February 2025
Subject: Community Engagement Strategic Plan Quarterly 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 outlines the progress and developments in the City of London Police and City of London Corporation's joint strategic community engagement plan since November 2024. Approved at Police Authority Board in October 2024, this plan centres on four priorities outlined in the Neighbourhood Policing and Engagement Strategy: crime prevention, protection of vulnerable individuals, intelligence gathering and fostering public trust.

This report assesses the effectiveness of community engagement based on the metrics set out in the Strategic Plan, including outcomes such as public confidence, crime reduction and demographic diversity.

This report also lists various community-safety related engagement activities (across the police, police authority and Corporation) undertaken since November 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.

### 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. At its meeting on 3 December 2024, the Strategic Planning & Performance Committee agreed that the Plan would 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

#### **Current Position**

3. Members are now presented with the first quarterly return of data from key metrics of the Community Engagement Strategic Plan:

Metric	Data return from November 2024 – January 2025	Strategic Insight / Commentary
a. Number of cluster panel meetings	6	One meeting per cluster was held across November 2024 in partnership with relevant departments within the City of London Corporation. More detail can be found below this table.
b. Number of business engagements	7	Events included: Crime Prevention Stalls Stop the Bleed (Specifically one held at Bloomberg office) VAWG Awareness Stand City Question Time (CoLP stall)

Me	etric	Data return from November 2024 – January 2025	Strategic Insight / Commentary
			Launch of City Muslim Network (attended by CoLP Engagement) New Year Gym Theft Campaign Op Reframe
C.	Number of Dedicated Ward Officer (DWO) – initiated community engagement events	115 total events (65 were officer initiated and 50 were requested by the community)	Types of events included: Crime Prevention stalls Bike Marking Stop the Bleed Walk & Talk
d.	Time dedicated to DWO high-visibility cluster patrols	185.5 hours	
e.		Return not yet available.	Officers are improving the data capture mechanism to be able to understand volunteer hours more broadly than volunteer hours by Specials, which is what is currently easily captured.
f.	Confidence score in the <u>City of London</u> <u>Police's public</u> <u>confidence survey</u>	<ul> <li>From 1<sup>st</sup> October to 31<sup>st</sup> December 2024, the average confidence score has been 3.31 out of 5. This is a minor increase from previous quarter (3.29 [+0.02])</li> <li>The most positive talking points in responses during this period have included the words or phrases: 'outcome', 'speed of service', 'advice' and 'helpful'.</li> <li>The most negative talking points in responses during this period have included the words or phrases: 'fraud', 'helpful', 'speed of service', 'animal', 'impact' and 'weapon'.</li> </ul>	The response rate has been fairly limited since its launch in July 2024, despite support from the City Corporation in promoting the survey through its existing channels (e.g. digital noticeboards, City Resident, City Belonging newsletter etc). CoLP Communications Team are working on a refreshed plan to promote the survey further, for example by mentioning it in news releases, more social media posts and by creating a physical handout that our own officers can use whilst on patrol.

Metric	Data return from November 2024 – January 2025	Strategic Insight / Commentary
g. Demographic breakdown (gender, ethnicity, age) of respondents to the City of London Police's public confidence survey	Gender:GenderAverage confidence scoreTotal no of responsesMale3.323Female3.418Other11undisclosed2.121Age: bracketAverage confidence scoreTotal no of responses16-245125-342.81235-643.32865+44undisclosed418Ethnicity:Total no confidence scoreWhite British3.224White British3.224White Asian4.45Mixed1.73Black undisclosed221	36% of respondents identified as male, whereas 28% of respondents identified as female. Female respondents reported a slightly higher confidence in the City of London Police than male respondents. Whilst the highest average confidence score fell in the 16-24 age bracket, this was only one respondent. The majority of respondents (44%) fell into the 35-64 age bracket. 25-34 year old respondents have the lowest levels of confidence in the City of London Police with an average score of 2.8. The majority of respondents identified as White British (38%) or undisclosed (33%). The highest average confidence score of 4.4 was given by those who identified as Asian.
h. DWO Nextdoor activity (no of posts)	1 x Next Door Post 17 x #CityNHP posts on X (formerly known as Twitter)	City of London Police have set up a Community Engagement WhatsApp channel, which provides an opportunity for Dedicated Ward Officers to broadcast messages 'one-way' to a group of recipients. A WhatsApp channel can be found by people searching online or via an invite link, where any smartphone user can

Metric	Data return from November 2024 – January 2025	Strategic Insight / Commentary
		then choose to follow the channel.
		channel. The City of London Police communicates in lots of ways, including social media channels, that offer opportunities to target different audiences and engage in two-way dialogue. We are introducing a (single Local Policing) WhatsApp channel to broadcast the details about activities or events where City of London residents, workers and visitors can interact with their local police service. A City of London Police WhatsApp channel will provide a further community engagement opportunity to share City- specific policing updates to those who live, work and visit the City of London, without needing to download a new app or sign up for another account. It is one of the communication methods we are introducing as part of our 2025 Strategic Community Engagement Plan and supports our Neighbourhood Policing Strategy, especially to further promote understanding about Dedicated Ward Officers
		and Local Policing Cluster meetings.

Metric	Data return from November 2024 – January 2025	Strategic Insight / Commentary
i. Number of 'you said – we did' problem- solving logs for cluster panel meetings	6	Barbican Cluster: ASB/ Cycle/E scooter E bike: Op Lewis Joint deployment, NHP & Cycle team: Aldersgate. Beech St Tunnel 4 Bike Marking 7 x FPNs (Fixed Penalty notices) 23 TORS (Traffic Offence Report) 47 Key messages Liverpool St Cluster: 1.Retail Theft: Occurrence Management Plan in place for Hotspot location which involves both uniform and plain clothes police officer deployment at key times/locations to prevent & detect theft. 2.Begging/ Rough
		Sleeping: Op Luscombe continued engagement with homeless communities. Diversion route in place with partner agencies for referrals. Regular deployments with Rough Sleeping lead and Dedicated Ward Officers within the cluster area. Future plans for joint up working with CoLP and BTP at Liverpool St. Fenchurch St Cluster:
		ASB/ Cycle/E scooter E bike: Aldgate Square Op Lewis Joint deployment, NHP & Cycle team planned for Spring 2025.

Metric	Data return from November 2024 – January 2025	Strategic Insight / Commentary

4. Whilst attendance at Cluster Panel meetings is not a performance metric, officers will be monitoring this information, alongside topics raised by the public. The latest review of November's Cluster Panel meetings are below:

Cluster	Date of meeting	No of external attendees	Topics raised by attendees
Bank	6 November 2024	2 in person 3 online	<ul> <li>Positive experiences with CoLP following incident at Innholders' Hall</li> </ul>
Liverpool St	7 November 2024	10 in person 5 online	<ul> <li>Fraud reporting</li> <li>Litter picking</li> <li>Lime docking bikes in non- designated zones</li> <li>Fear of gang-related violence in East London</li> </ul>
Fenchurch St	7 November 2024	0 in person 7 online	<ul> <li>Noise from unlicensed premises at unsocial hours</li> <li>Urination and defecation</li> <li>Rough sleepers</li> <li>Cyclists jumping through red lights</li> </ul>
Fleet	13 November 2024	12 in person 7 online	<ul><li>Urination and defecation</li><li>Graffiti</li><li>Rough sleepers</li></ul>
Monument	13 November 2024	8 in person 2 online	<ul> <li>Praise for walk &amp; talk initiative</li> <li>Praise for high-vis patrols over bridges to deter beggars</li> <li>Praise for response times to an incident at Northern &amp; Shell</li> </ul>
Barbican	27 November 2024	17 in person 1 online	<ul> <li>Lime bike users running red lights at Barbican crossing</li> <li>Pavement cyclists</li> <li>Waitrose deliveries causing access issues</li> <li>Homelessness at CLSG, top of Long Lane, Barbican station and entrance to Tesco near Barbican Station</li> <li>Skateboarding</li> <li>Filming pornography in Long Lane</li> </ul>

5. This information and insight will provide officers evidence at the end of the Cluster Panel model pilot in December 2025 to assist with evaluation. The topics raised will be looked into by teams and this will feed into 'you said, we did' updates in the future. An interim evaluation debrief session is being held with Local Policing in early February 2025 to make improvements ahead of the April 2025 series of meetings.

#### Wider community engagement since September 2024

6. Since the last report to the SPPC, the following Police-led or community safety focused engagements have taken place or are due to take place soon:

No.	Date	J.J			
1	06/11/2024	Op Morden Crime Prevention	Workers / Visitors		
		Stand, One New Change			
2			Workers /		
		at Nomura with a focus on	Businesses		
Hate Crime		Hate Crime			
3	25/11/2024 -	16 days of activism against	All		
	10/12/2024	Gender Based Violence			
		(Social Media posts,			
		Awareness Stand at			
		Blackfriars)			
4	28/11/2024	Op Reframe, Liverpool Street	Workers / Visitors		
5	05/12/2024	Stop the Bleed Session,	Workers /		
		Bloomberg	Businesses		
6	6 10/12/2024 VAWG Awareness Stand,		Workers / Visitors		
		Blackfriars			
7	10/12/2024	City Question Time	Residents		
8	11/12/2024	City Muslim Network Launch	Workers /		
		Event	Businesses / Faith		
			Groups		
9	12/12/2024	Youth Engagement Event,	Students / Young		
		Bishopsgate	People		
<b>10</b> 13-17/01/2025 Gym Theft Ca		Gym Theft Campaign	Workers /		
			Businesses /		
			Residents		
11	16/01/2025	Op Reframe	All		
12	23/01/2025	Careers day at Jewish	Students / Faith		
		College, Borehamwood	Groups		
13			Workers /		
Belonging Launch, Mansion House			Businesses / Faith		
		Groups			
14	03-14/02/2025	London Careers Expo	Businesses		
15	05/03/2025	Public Women's Night Walks	Workers / Residents		
16	10/03/2025	Public Women's Night Walks	Workers / Residents		
17	19/03/2025	Public Women's Night Walks	Workers / Residents		
18	24/03/2025	Public Women's Night Walks	Workers / Residents		

7. The above engagements reflect the feedback from Members to increase engagement with businesses since September 2024. We have worked with the City Belonging Project team to increase officer presence at launch events of staff networks across the City, noting that this could lead to better engagement opportunities to deliver on our Equity, Diversity and Inclusion strategy. Future engagements will be organised to reflect our Policing Plan 2025-28 priorities which will come into effect from April 2025.

### Conclusion

- 8. This report highlights the City of London Police's commitment to fostering community trust, reducing crime, and improving public safety through robust engagement initiatives. Key progress has been made in implementing the Strategic Community Engagement Plan, particularly in hosting diverse community events, increasing visibility through high-visibility patrols, and engaging with under-represented groups via platforms like WhatsApp channels and the Public Confidence Survey.
- 9. While the data reflects a minor improvement in public confidence and outlines a comprehensive list of activities, challenges remain in areas such as increasing participation rates in surveys, addressing demographic disparities, and maintaining consistency in volunteer engagement metrics. For example, the disproportionately low response from some age and ethnic groups underscores the need for targeted outreach efforts.
- 10. Looking ahead, the initiatives such as "You Said, We Did" logs and interim evaluations of cluster panel meetings demonstrate a proactive approach to incorporating community feedback. Continued alignment of engagement efforts with the Policing Plan 2025-28 will further strengthen partnerships and enhance service delivery. In conclusion, the City of London Police has made meaningful strides in implementing its strategic priorities, and with sustained effort and targeted adjustments, it is well-positioned to build on these successes to create a safer and more inclusive City environment.

#### **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.
- Community Engagement Quarterly Update & Measures of the Strategic Plan Report of the Commissioner of Police presented to the Strategic Planning & Performance Committee on 26<sup>th</sup> November 2024 and the Police Authority Board on 3 December 2024.

#### Appendices

• None

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## Agenda Item 21

## Agenda Item 22

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

## Agenda Item 25

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

## Agenda Item 26

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

## Agenda Item 27

By virtue of paragraph(s) 3, 5 of Part 1 of Schedule 12A of the Local Government Act 1972.

## Agenda Item 28

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

# Agenda Item 29

# Agenda Item 30

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

# Agenda Item 31

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

# Agenda Item 32

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

# Agenda Item 33

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

# Agenda Item 34

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.