

## HMICFRS Report Recommendations

Traffic Light Colour	Definition of target achievement
<b>GREEN</b>	The recommendation is implemented
<b>AMBER</b>	The recommendation is subject to ongoing work and monitoring but is anticipated will be implemented
<b>RED</b>	The recommendation is beyond designated deadline or cannot / will not be implemented (rationale required) or
<b>WHITE</b>	The recommendation is not CoLP responsibility to deliver or is dependent upon another organisation delivering a product.

## Joint Inspection of the Handling of Cases Involving Disability Hate Crime

A national joint report by HMICFRS and HMCPSi

Published October 2018

This report makes 4 recommendations for the police, these are being progressed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	Chief constables should ensure that the system used to transfer information to the CPS regarding the request for charging advice clearly identifies cases where, in accordance with the definition, the police consider a case to be a hate crime.	AMBER	No deadlines have been set within the published report.	This report was only published in October 2018. Strategic Development has received the report and a draft action plan is in development in liaison with the relevant business area. Updates will be provided to the next Sub Committee.
2	Chief constables should ensure that all cases involving disability hate crime are accurately flagged in accordance with the Home Office counting rules for recorded crime.	AMBER	The force will assess	
3	Chief constables should ensure that there is effective supervision of all disability hate crime cases, to assure themselves that investigations and subsequent case file	AMBER		

Recommendations & Areas for Improvement		Status	Due Date	Comment
	submissions to the CPS have been completed to an appropriate standard.		the report and set its own deadline	
4	Chief constables should ensure that victims are offered an opportunity to make personal statements in all relevant cases, and that, when appropriate, these statements are taken and provided to the CPS.	AMBER		

The following recommendations are for the CPS and NPCC Lead to progress and are shown here for completeness.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	The prosecutor at the charging stage, or initial review in police-charged cases, should comply with the CPS guidance and set out clearly why the case should be flagged on the CPS case management system as a disability hate crime.	WHITE		This action is for the CPS.
2	The CPS, in conjunction with the National Police Chiefs' Council, should revise the police section of the MG3 record of charging decision so it can be flagged clearly to identify cases where, in accordance with the definition, the police consider there to be a hate crime.	WHITE		This action is for the CPS.
3	Prosecutors should ensure that, in every case for which an s146 uplift is to be applied, they set out clearly at the charging stage the evidence or information that supports the application.	WHITE		This action is for the CPS.
4	The CPS should modify the prosecutor app to allow the prosecutor at court to check the relevant box on the case management system which shows that the s146 uplift has been applied by the court.	WHITE		This action is for the CPS.

Recommendations & Areas for Improvement		Status	Due Date	Comment
5	The CPS should negotiate with Her Majesty's Courts and Tribunal Service to ensure that the court sentencing record distinguishes the basic and uplift elements of the offence.	WHITE		This action is for the CPS.
6	Prosecutors should comply with the requirement to send an s146 letter to the court and the defence and compliance should be monitored by Area Hate Crime Co-ordinators.	WHITE		This action is for the CPS.
7	The CPS and the National Police Chiefs' Council leads for out-of-court disposals should review the current guidance for hate crime out-of-court disposals and should revise this guidance to make it clear when these are appropriate for hate crime.	WHITE		This action is for the CPS and NPCC lead.

## Understanding the difference: the initial police response to hate crime

A national report by HMICFRS  
Published July 2018

This report makes 15 recommendations. 8 are for the force and 2 of these are complete, 5 are in progress and 1 is held at WHITE pending the outcome of a review by the NPCC lead and College of Policing.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><u>Cause of concern</u></p> <p>We are concerned that forces and the government don't have enough information to understand fully how different groups are victimised. Having more information would make sure police activity is intelligence-led and that victims get the right support.</p>	WHITE	January 2019	This action is for the NPCC Hate Crime lead, Home Office and the Ministry of Housing, Communities and Local Government. See recommendation below.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p><u>Recommendation</u> We recommend that, within six months, the NPCC hate crime lead works with the Home Office and the Ministry of Housing, Communities and Local Government to consider jointly whether flags for all forms of hate crime should be differentiated to give a better understanding of how different groups are victimised.</p>			
<p>2</p> <p><u>Cause of concern</u> We are concerned that flagging hate crime incorrectly has serious implications for forces in terms of their ability to understand hate crime and how it affects victims and their communities, and then respond appropriately. Incorrect flagging also undermines the integrity of published national data and analysis.</p> <p><u>Recommendation</u> We recommend that, within three months, chief constables make sure hate crimes are correctly flagged, and that forces have good enough processes in place to make sure this is done.</p>	<p>AMBER</p>	<p>October 2018</p>	<p><u>Task Required</u> Flagging guidance and confirmation that appropriate processes are embedded.</p> <p><u>Current position</u> There are still issues with the consistency and accuracy of flagging. Flagging guidance is being produced by the Head of Public Protection to ensure officers understand requirements and includes specific reference to Hate Crime. This document is in consultation and due for issue in November 2018.</p> <p>The new guidance will be circulated on completion (scheduled for Nov 18) after which there will need to be a period of checks to ensure that the new guidance is being complied with.</p> <p>This guidance references the Crime Management and Public Protection Units documenting existing practises for reviewing flags in addition to officer responsibilities.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>3</p> <p><u>Cause of concern</u> We are concerned that some hate crime victims may be vulnerable to being targeted repeatedly and, at the moment, the risks to them aren't being assessed well enough.</p> <p><u>Recommendation</u> We recommend that, within six months, chief constables adopt a system of risk assessment for vulnerable victims of hate crime. The NPCC lead for hate crime and the College of Policing should give chief constables advice about how best to do this.</p>	<b>AMBER</b>	January 2019	<p><u>Task Required</u> Review current risk assessment system and adopt any forthcoming advice from the NPCC lead and College of Policing.</p> <p><u>Current Position</u> Community Policing are revising the ASB SOP to include a risk assessment question set and score matrix. This will capture hate crime related incidents and link into E-CINS<sup>1</sup>, which has been purchased by the City of London Corporation [implementation pending]. These enhancements will further facilitate the identification of lower risk hate crime and assist in identifying and managing the response to repeat victims; high risk hate crime is already managed by the public protection unit with a suitable risk assessment process in place.</p> <p>The score matrix is to be available to officers within Pronto/Niche for them to complete when dealing with incidents.</p>
<p>4</p> <p><u>Cause of concern</u> We are concerned that the risks to some hate crime victims aren't being managed well enough or consistently enough, and some hate crime victims are less safe as a result.</p> <p><u>Recommendation</u> We recommend that, within six months, chief constables incorporate risk management into a risk assessment process for vulnerable victims of hate crime. The NPCC lead for hate crime and the College of Policing should give chief constables advice about how best to do this.</p>	<b>NEW GREEN</b>	January 2019	<p><u>Task required</u> Review risk assessment processes for vulnerable victims of hate crime.</p> <p><u>Current position</u> The RARA [Remove, Avoid, Reduce or Accept] risk management model is utilised by the Public Protection Unit.</p> <p>Communities have a nominated ASB officer who conducts assessments of related incidents [which will include hate crimes], providing an escalation path if appropriate.</p>

<sup>1</sup> E-CINS is a joint database used by partners to problem solve across many areas of policing

	Recommendations & Areas for Improvement	Status	Due Date	Comment
5	<p><u>Cause of concern</u> We are concerned that the recurring risks to some hate crime victims aren't being managed well enough or consistently enough, and that the most vulnerable victims would be safer if the police routinely worked with partner organisations to manage risks to victims.</p> <p><u>Recommendation</u> We recommend that, within six months, chief constables work with partner organisations to adopt a system of risk management for vulnerable victims of hate crime. The NPCC lead for hate crime and the College of Policing should give chief constables advice about how best to do this. They should also consider whether the principles of the multi-agency risk assessment conferences (MARAC) process are a good way to manage the risks to hate crime victims.</p>	AMBER	January 2019	<p>Guidance from the NPCC lead for hate crime and the College of Policing is pending.</p> <p>However, the force already utilises the MARAC process for hate crime incidents when appropriate and this is reflected within the Hate Crime SOP.</p>
6	<p><u>Cause of concern</u> We found that forces don't consistently use the Home Office cyber-enabled flag. This means forces and the government may not have good enough information to understand how much different groups are targeted online, which means they can't make sure effective decisions are made about how to respond.</p> <p><u>Recommendation</u> We recommend that, within three months, chief constables make sure that the Home Office cyber-enabled flag is</p>	AMBER	October 2018	<p>The Head of Public Protection is producing guidance on flagging [reference recommendation 2 above] currently in consultation and will be issued in November 2018.</p> <p>The daily crime meeting has cyber enable crime as a standing item to ensure an appropriate response to any reported crimes.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
consistently applied, and that forces have adequate systems in place to make sure that this is done.			
<p>7</p> <p><u>Recommendation</u> We believe there needs to be a change to control room practice to make sure victims are asked why they perceive that the perpetrator has acted as they have done. This will make sure victims get an appropriate response.</p> <p>We recommend that, within six months, the NPCC lead for hate crime should review and consult on the introduction of a police force control room process, whereby callers are asked why they perceive that the perpetrator has acted as he or she has done.</p>	NEW GREEN	January 2019	<p><u>Task required</u> Establish the existing process within control and establish if change is required.</p> <p><u>Current position</u> This is already reflected within current practice. The CAD system provides prompts when recording; specifically asking why the caller believes it had happened or why they believe they have been targeted.</p>
<p>8</p> <p><u>Recommendation</u> Our inspection shows that some hate crime victims get a better service than others. This is because forces apply the national minimum standard of response to victims of hate crime inconsistently.</p> <ul style="list-style-type: none"> <li>• We recommend that, within six months, the NPCC lead for hate crime works with the College of Policing to review the operational guidance about the minimum standard of response to establish if it is still appropriate and relevant for forces</li> <li>• We recommend that, following the review, any agreed minimum standard of response for forces should be monitored by force governance processes, including external scrutiny.</li> </ul>	WHITE	January 2019	<p>This action is for the NPCC lead for hate crime and College of Policing.</p> <p>The force complies with current guidance issued by the College of police Hate crime operation guidance 2014.</p> <p>The College of Policing will be replacing their guidance with a Hate Crime APP, but no delivery timelines have been published.</p> <p>The Head of Public Protection maintains a watching brief.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
9	<p><u>Recommendation</u> We believe hate incident data is a valuable source of information about hate crime. However, this data can't currently be broken down into sub-categories to give a better understanding of the victimisation of different groups.</p> <ul style="list-style-type: none"> <li>• We recommend that, within six months, the NPCC lead should work with the Home Office and the Ministry of Housing, Communities and Local Government to review the section of the National Standard for Incident Recording which relates to hate incidents. This should establish what updates would lead to more detailed data on hate crime incidents, which in turn would allow better understanding of the victimisation of different groups.</li> </ul>	WHITE	January 2019	This action is for the NPCC Lead for Hate Crime.
10	<p><u>Recommendations</u> We don't think the College of Policing operational guidance currently reflects the importance of appropriately flagging hate and cyber-enabled crime.</p> <ul style="list-style-type: none"> <li>• We recommend that, within six months, the College of Policing should review and refresh the hate crime operational guidance. This is specifically with reference to the importance of making sure hate crimes are flagged appropriately.</li> </ul>	WHITE	January 2019	This action is for the College of Policing
11	We recommend that, within six months, the NPCC lead for hate crime and the College of Policing should work together to review and update the hate crime operational guidance to include a section on online offending.	WHITE	January 2019	This action is for the NPCC lead for Hate Crime and the College of Policing
12	<p><u>Recommendation</u> In our view, police forces aren't always giving some hate crime victims enough information about support groups or what</p>	WHITE	No date set by HMICFRS	This action is for the NPCC lead for Supporting Victims

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>happens next with their cases. In other cases, when the police do give victims the information, the police don't always give enough consideration to the victim's circumstances (for instance, by making this information available in different formats or languages).</p> <ul style="list-style-type: none"> <li>• We recommend that the NPCC lead for supporting victims should urgently review how much information forces give victims of hate crime. They should also give chief constables guidance about how best to communicate with victims of hate crime, taking their personal circumstances into consideration.</li> </ul>			
<p>13</p> <p><u>Recommendation</u> In our view, forces don't gather and use intelligence about hate crime consistently enough. This means forces don't have enough information to understand fully how different groups are victimised and make sure that officers make effective decisions about how to respond.</p> <ul style="list-style-type: none"> <li>• We recommend that chief constables make sure officers know it is important to find and record more intelligence about hate crime and use it to inform the police response.</li> </ul>	<b>AMBER</b>	<p>No date set by HMICFRS</p> <p>Deadline of April 2019 set</p>	<p>At this time the force does not have a hate crime problem profile and its priority for production is currently being assessed by FIB.</p> <p>Hate crime incidents are already monitored by the Force Intelligence Bureau (FIB) and reported externally to the national Community Tensions Team. Internally, hate crime is reported within the vulnerability dashboard [monthly].</p>
<p>14</p> <p><u>Area for improvement</u> The College of Policing should review the existing hate crime training package. It should then give details of effective training to all forces for them to use, so they can give victims of hate crime a better service.</p>	<b>WHITE</b>	<p>No date set by HMICFRS</p>	<p>This action is for the College of Policing</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
15	<p><u>Area for improvement</u></p> <p>The NPCC lead for hate crime should review whether the national hate crime team has enough staff. If necessary, the NPCC lead should commit to recruiting more staff to make sure positive change happens as quickly as possible.</p>	WHITE	No date set by HMICFRS	This action is for the NPCC lead for Hate Crime

## Out-of-court disposal work in youth offending teams

A national joint report by HMICFRS and HMI Probation

Published March 2018

This report makes 11 recommendations, 5 are for the force and are in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
4	<p><b>Recommendation</b></p> <p>Youth offending teams and chief constables should: Make sure that the requirements of youth conditional cautions are meaningful to children, and describe the desired outcomes and how these will be achieved.</p>	AMBER	No deadline specified within the report	<p>The force has conducted an audit which has established a baseline of the number of youth conditional cautions and shortcoming arising from their issue.</p> <p>Numbers are low: 8 youth cautions and 3 youth conditional cautions in the year 2017/2018.</p>
5	<p><b>Recommendation</b></p> <p>Youth offending teams and chief constables should: Make sure that all victims have a fully informed and effective opportunity to have their views heard, and to receive an appropriate restorative intervention.</p>	AMBER	March 2019 deadline set	<p>A process map is in production to ensure officers understand their specific roles in following APP and this is likely to be supported with additional guidance. If they don't already do so, this will ensure that officers are able to articulate and reinforce the implications of receiving an out of court disposal to children before they accept it.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
6	<p><b>Recommendation</b> Youth offending teams and chief constables should: Make sure that children understand the implications of receiving an out-of-court disposal before they are asked to accept it.</p>	AMBER		With reference to referrals to YOTs the process map will also assist in giving officers clearer guidance on this issue too.
10	<p><b>Recommendation</b> Chief constables should make sure that referrals to YOTs are sufficiently timely to meet the needs of victims for speedy justice and achieve the objectives of out-of-court disposals; and make the YOT aware of all community resolutions given by the police.</p>	AMBER	No deadline specified within the report	
11	<p>Chief constables should make sure that they have clear and consistently applied policies for the gathering of fingerprints and other biometric information in youth caution and conditional caution cases.</p>	AMBER	March 2019 deadline set	Custody SOPs are being reviewed to ensure adequate direction for custody staff when processing youths.

# PEEL: Police Effectiveness 2017 – National

A national report by HMICFRS

Published March 2018

This report was published 22<sup>nd</sup> March 2017.

There are 4 recommendations which applies to the force; 3 are complete, 1 is held at WHITE pending input from the College of Policing

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>1</p> <p><b>Recommendation</b> By October 2018, all forces should review their own approach to neighbourhood policing to check whether the service they provide to local communities meets these guidelines. As soon as possible, they should make any changes they need to implement the guidelines.</p>	<p><b>NEW GREEN</b></p>	<p>October 2018</p>	<p>The College of Policing were to publish the final version of their guideline in April 2018, however this was delayed by 2 consultations the college undertook. The final version of the guidance was republished in September 2018.</p> <p>However a report was presented to the Transform Board on 25th April 18 re Community Engagement Services detailing early opportunities to focus on relevant areas of the Corporate Plan and the College of Policing’s new (draft) Neighbourhood Policing Guidance with proposals re realignment of resources. This approach was also ratified at the Forces Strategic Management Board in September 2018.</p> <p>Further reports will be presented to scheduled Transform Boards if necessary for any further changes.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p><b>Recommendation</b></p> <p>By September 2018, all forces with a shortage in qualified detectives and/or other investigators should develop an action plan. The plan should set out in detail what the force will do to address the shortage in the short, medium and long term. It should be in line with the national plan to develop investigative capacity and capability that all chief constables in England and Wales have agreed.</p> <p>This plan should draw on the information in the force management statement about:</p> <ul style="list-style-type: none"> <li>the investigative demand the force expects to face in the next four years; and</li> <li>how the force will change and improve the condition, capacity, capability, serviceability, performance and security of supply of its workforce and other assets to cope with that demand.</li> </ul> <p>To make sure the plans are consistent, the National Police Chiefs' Council lead on investigative resilience has agreed to provide advice on the areas each plan should cover by April 2018.</p>	<p><b>NEW GREEN</b></p>	<p>September 2018</p>	<p>On 14th May 2018 NPCC (Investigator Resilience Programme Team) provided force(s) with a template action plan, advice and guidance which the force has used to develop their own local plan (drawing on work being developed at a national level).</p> <p>The force has populated this template which is reviewed at Strategic Workforce Planning.</p>
<p><b>Recommendation</b></p> <p>The College of Policing, working with the NPCC leads, should develop an approach to peer review. This approach should support forces to work with each other to improve how they identify, respond to and keep safe vulnerable victims.</p> <p>The infrastructure to support peer reviews should be in place by September 2018 with the first reviews taking place by January 2019.</p>	<p><b>NEW WHITE</b></p>	<p>September 2018 And January 2019</p>	<p>This matter has been alerted to the Vulnerability Working Group Chair but as yet no information regarding peer reviews has been received from the College of Policing.</p> <p>This cannot be progressed until the College has produced details of the peer review.</p> <p>The College of Policing has recently launched a new Vulnerability training package. L&amp;D training officers have attend 'train the trainer' events in order to be able to deliver this accredited package in force and a programme of delivery is being arranged with duty planning to maximise attendance.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
4	<p><b>Recommendation</b></p> <p>By September 2018, all forces should review how they are implementing changes to pre-charge police bail, working with the National Police Chiefs' Council lead.</p> <p>The review should include an assessment of how far vulnerable people are being affected by these changes.</p> <p>As soon as possible, forces should then put into effect any necessary changes to make sure they are using bail effectively, and in particular that vulnerable victims get the protection that bail conditions can give them.</p>	NEW GREEN	September 2018	<p>Oversight of the Bail Act sits with Custody Management which meets on a regular basis and includes updates from the Bail Manager as a standing item.</p> <p>The bail SOP has been reviewed and updated appropriately.</p>

## PEEL: Police Effectiveness 2017 – CoLP

A force report by HMiCFRS

Published March 2018

This report was published 22<sup>nd</sup> March 2018.

There are 5 recommendations; 4 are complete, 1 is being progressed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><b>Area for Improvement</b></p> <p>The force should review its process for sharing information with schools in relation to children affected by domestic abuse incidents, to ensure information is shared as quickly and effectively as possible.</p>	NEW GREEN	No deadlines set by HMiCFRS	<p>The force has conducted this review and as a result has engaged with Corporation partners to implement Operation Encompass which is a scheme running in 33 forces working in partnership to facilitate the early sharing of information.</p> <p>The Head of the Public Protection Unit updates the Corporation's Safeguarding and Education forum, most recently on the 2<sup>nd</sup> October 2018.</p> <p>Implementation of this information sharing platform is expected for January 2019 to align with the new school term.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<p><b>Area for Improvement</b></p> <p>The force should ensure that it is proactive in its approach to identifying and apprehending those who produce or share indecent images of children.</p>	NEW GREEN	<p>No deadlines set by HMICFRS</p> <p>Force to determine</p>	<p>In response to this area for improvement the Public Protection Unit has agreed a process with the cyber-crime Unit to check 1 IP address per month to establish if it geo-locates to the City.</p> <p>The Public Protection Unit are linked in with the relevant teams/groups regionally around this work.</p> <p>Consideration has been given to a PPU officer being trained to undertake these checks; demand is low and this was not pursued.</p>
4	<p><b>Area for Improvement</b></p> <p>The force should enhance its approach to the 'lifetime management' of organised criminals to minimise the risk they pose to local communities. This approach should include routine consideration of ancillary orders, partner agency powers, and other methods to deter organised criminals from continuing to offend.</p>	AMBER	<p>No deadlines set by HMICFRS</p> <p>November 2018 deadline set to align with the next PEEL inspection</p>	<p>The force has reviewed and enhanced its governance arrangements in addition to considering additional posts.</p> <p>Both the Transform Board (April 2018) and the Strategic Management Board [September 2018] have agreed to 4 dedicated Lifetime Offender Management posts appointment to these positions will be an internal process. HR has been given authority by Commander Ops to progress this as a priority.</p>
5	<p><b>Area for Improvement</b></p> <p>The force should strengthen its response to drug-dealing networks using 'county lines', to stop them inflicting violence and exploitation on local communities</p>	NEW GREEN	<p>No deadlines set by HMICFRS</p> <p>Nov 2018 deadline set to align with next PEEL inspection</p>	<p>The force has produced a drugs problem profile together with a risk reduction strategy. This has been presented to the force tactical tasking and co-ordination group for progressing and monitoring.</p>

# PEEL: Police Legitimacy 2017 – National

A national report by HMICFRS

Published 12<sup>th</sup> December 2017

There are 2 recommendations which apply to the force; 1 is complete and 1 in progress due November 2018.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p><b>Cause of concern</b> HMICFRS is concerned that forces are not able to demonstrate that the use of stop and search powers is consistently reasonable and fair. In particular, there is over-representation of BAME people, and black people in particular, in stop and search data which many forces are unable to explain.</p> <p><b>Recommendation</b> By July 2018, all police forces across England and Wales should be regularly and frequently monitoring a comprehensive set of data and information on use of stop and search powers to understand:</p> <ul style="list-style-type: none"> <li>the reasons for any disproportionate representation of different ethnic groups in the use of stop and search;</li> <li>the extent to which find rates differ between people from different ethnicities, and across different types of searches (including separate identification of find rates for drug possession and supply-type offences); and</li> <li>the prevalence of possession-only drug searches, and the extent to which these align with local or force level priorities.</li> </ul> <p>Where forces identify disparities through monitoring, they should demonstrate to the public that they have:</p> <ul style="list-style-type: none"> <li>carried out research and analysis in an attempt to understand the reasons for the disparity, and</li> <li>taken action to reduce the disparity, where necessary;</li> </ul> <p>We expect forces to publish this analysis and any actions taken at least on an annual basis, from July 2018.</p>	<p><b>RED</b></p>	<p>July 2018</p> <p>Now due November 2018</p>	<p>The stop and search dashboard has been re-established and published quarter 1 2018/2019. This collects and collates data on requisite aspects of Stop and Search.</p> <p>The Stop and Search and Use of Force Working Group [September 2018] received this dashboard and reviewed it.</p> <p>Whilst comprehensive, work is ongoing in relation to:</p> <ul style="list-style-type: none"> <li>find rates by ethnicity across different types of search</li> <li>Drug possession find rates</li> <li>Outcomes by police unit / Officer to enable scrutiny by the Stop and Search and Use of Force Working Group [not for publication].</li> </ul> <p>These will be included within future dashboards and planned for the quarter 2 2018/2019 to be published November 2018.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>2</p> <p><b>Recommendation</b> By July 2018, and ongoing following that date, forces should ensure that all officers who use stop and search powers have been provided with, and understand, training on unconscious bias and College of Policing APP on stop and search.</p>	<p>AMBER</p>	<p>Force Set deadline of December 2018</p>	<p>The force has mandated training for all Police teams which undertake stop and search as part of their normal deployment, these teams have been identified. This training was already being delivered at the time this report was published and continues to be; training attendance is monitored by the Stop and Search and Use of Force Working Group.</p> <p>Police teams which undertake stop and search have been identified and the target to achieve this is currently by 20<sup>th</sup> December 2018.</p> <p>As of 06/11/18:</p> <ul style="list-style-type: none"> <li>• 207 officers have received the updated stop and search training</li> <li>• There are 513 officers still to complete the training</li> <li>• 178 of those outstanding are considered a priority owing to performing an operational/ frontline role.</li> </ul> <p>Duty Planning have rostered all staff set dates to attend this training. However it is proving challenging to fill the courses to capacity for a number of reasons including other training which has been prioritised such as Disclosure training and Vulnerability training. The training abstractions coupled with other abstractions for annual leave and sickness have an impact on resilience for BAU. Head of L&amp;D is reviewing this position with colleagues with a view to increasing capacity on the S&amp;S training courses.</p> <p>The stop and search training being delivered was designed by the College of Policing for use by all forces and incorporates unconscious bias training.</p>

# PEEL: Police Legitimacy 2017 – CoLP

A national report by HMICFRS  
Published 12<sup>th</sup> December 2017

There are 7 areas for improvement which apply to the force, 5 are complete, 2 closed.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>6</p> <p>The force should improve its ability to monitor and improve the fairness and effectiveness of its process for managing individual performance and development and communicate this to the workforce.</p>	<p><b>NEW GREEN</b></p>	<p>Deadline October 2018 assigned by Strategic Development to align with the November 2018 IPA inspection</p>	<p>This area for improvement was originally cited within the PEEL Legitimacy 2016 force level report.</p> <p>Progress already reported to HMICFRS includes:</p> <ul style="list-style-type: none"> <li>• The Talent Management Strategy launching 10<sup>th</sup> July 2018 and its associated working group</li> <li>• Establishment of a Performance Development Action Plan</li> </ul> <p>The automated PDR Review Process was introduced in May 18. All officers and staff are required to upload their 2018/19 objectives onto system and recording evidence and progress against throughout year. This electronic system will enable more effective monitoring of process on an ongoing basis.</p> <p>The force PDR intranet site has been reviewed and updated and includes update guidance including delivery of feedback.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
7	The force should improve its understanding of its workforce's wellbeing and use this to prioritise the services it provides.	NEW GREEN	August 2018	<p>The force has a well-being action plan, champion and well established staff network group.</p> <p>The workforce plan has been revised and references a five year Wellbeing Framework with priorities.</p>

## PEEL: Police Efficiency [including leadership] 2017 - COLP

A force report by HMICFRS

Published November 2017

There are 4 recommendations which apply to force and are complete.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><b>Areas for improvement</b></p> <p>The force should put in place better processes and governance to understand and realise the benefits of change programmes, and how they affect the force's ability to meet likely future demand efficiently.</p>	NEW GREEN	<p>HMICFRS have not set a deadline.</p> <p>Internal deadline set to align with the IPA PEEL inspection</p> <p><b>November 2018</b></p>	<p><b>Task Required</b></p> <p>Implement benefits management within force, embedding processes and creating a governance structure that ensures this becomes business as usual.</p> <p><b>Current position</b></p> <p>The force engaged consultants in 2017/18 who developed a benefits toolkit together with a governance framework. This toolkit has been piloted with a force project and is beginning to be rolled out across other projects.</p> <p>Benefits will be tracked at the monthly Force Change Portfolio Board as a standing item going forward.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
3	<p><b>Areas for improvement</b></p> <p>The force should ensure that it understands the level of service that can be provided at different levels of costs, so it can identify the optimum level of service provision.</p>	NEW GREEN	<p>HMICFRS have not set a deadline.</p> <p>Internal deadline set to align with the IPA PEEL inspection</p> <p><b>November 2018</b></p>	<p>Evidence against this area of improvement will derive from the 2018 STRA process and Transform programme, both of which are ongoing.</p> <p>The STRA process commenced in July 2018 and challenge workshops held in October 2018. STRA submissions included costed options.</p> <p>The Transform programme is currently in the phase of analysing current and future demand across each strand of the programme to ensure the appropriate level of service provision is planned into the new Target Operating Model, this will also contribute to identifying the optimum level of service provision.</p>

## Stolen freedom: the policing response to modern slavery and human trafficking

A national report by HMICFRS

Published October 2017

There are 11 recommendations; 7 of which apply to force, 5 are completed, 1 to be progressed and 1 closed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<p><b>Recommendation</b></p> <p>Within twelve months, forces should review their leadership and governance arrangements for modern slavery and human trafficking, to ensure that:</p> <ul style="list-style-type: none"> <li>senior leaders prioritise the response to modern slavery and human trafficking;</li> </ul>	NEW GREEN	October 2018	<p>Any incidents are raised at the daily Management Meeting, the force has a standing operating procedure which details specific roles allocated to specialist officers when dealing with victims and offenders of these crime types.</p> <p>The force is represented by the Chief Inspector for Uniformed Policing Directorate (UPD) or a suitable nominee at the Modern Slavery and</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<ul style="list-style-type: none"> <li>• every incident of modern slavery identified to police is allocated appropriate resources with the skills, experience and capacity to investigate it effectively;</li> <li>• forces develop effective partnership arrangements to co-ordinate activity in order to share information and safeguard victims; and</li> <li>• Performance and quality assurance measures are in place to allow senior leaders to assess the nature and quality of the service provided to victims.</li> </ul>			<p>Human Trafficking practitioners meeting which is attended by partners and agencies.</p> <p>The national Section 22A Collaboration Agreement on Modern Slavery Transformation Fund has been approved at Police Committee and signed.</p> <p>The Regional Co-ordinator from Eastern Region Special Operations Unit (ERSOU) attended COLP on 28th March 2018 to provide a peer review on current 4P action plan and found it to be more than satisfactory.</p> <p>All incidents or intelligence is drawn to the attention of the force lead, their deputy and the FIB analyst for review.</p> <p>A vulnerability dashboard has been developed which incorporate monitoring data on modern slavery and human trafficking. This is reviewed at Tactical Tasking and Co-ordination.</p>
<p><b>Recommendation</b></p> <p>Within six months, forces should have in place active information-sharing agreements with other agencies to facilitate speedy exchange of intelligence and in order to safeguard victims better and to identify suspects as early as possible.</p>	<b>NEW CLOSED</b>	April 2018	<p>The force engages with modern slavery and human trafficking partners and agencies on a monthly basis. The frequency and nature of information disclosed with other partners is managed on a case by case basis and formal information sharing agreements are not required at this time, but remain an option if volumes increase.</p> <p>The National Section 22A Modern Slavery Transformation Fund Collaboration Agreement has been signed this enables the force to:</p> <ul style="list-style-type: none"> <li>• Access products, process and good practice in order to get learning and understanding around MSHT embedded into forces, including access to the Head of Insight and Analysis and the Head of Operations and Development and their teams; and</li> <li>• Have ability to request bespoke assistance in furthering strategy, policy, operational or analytical efforts by drawing on advice</li> </ul>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			from specialists from the national team funded through the transformation programme.
<p>5</p> <p><b>Recommendation</b> Immediately, forces should ensure that all victims carrying out criminal acts under compulsion attributable to slavery or exploitation are afforded the protection of early and continuing consideration of the applicability of the section 45 defence.</p>	<b>AMBER</b>	<p>Immediate</p> <p>A deadline of February 2019 has been set.</p>	<p>The Human Trafficking standard operating procedure deals specifically with offenders who may also be victims in these circumstances.</p> <p>The SOP has been reviewed and published in March 2018 and remains on annual review.</p> <p>There is also a specific section on the force intranet which offers guidance, advice and external contact details for officer use.</p> <p>The force crime, intelligence and custody system has been reviewed to establish if section 45 defences can be flagged and highlighted for supervisory review. At this time no flags have been identified. The crime management process is currently being revised and procedural reviews will be included to capture this requirement.</p>

# Living in fear - the police and CPS response to harassment and stalking

A joint national report by HMCPSi and HMIC

Published July 2017

There are 22 recommendations; 4 of which apply to force, 3 are in progress and 1 is closed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
8	Chief constables should stop the use of Police Information Notices and their equivalents immediately.	<b>NEW CLOSED</b>	Immediate	This recommendation has not been fully accepted nationally and the College of Policing is exploring alternatives. Police Information notices (PINs) remains an option for the force.  In the meantime, the SOP has been amended – Police Information notices can only be authorised by the DI Public Protection Unit.
9	Chief constables should ensure that officers are aware of, and use appropriately, the powers of entry and search for stalking. Chief constables should also ensure that adequate records of these searches are compiled for audit and compliance purposes.	<b>AMBER</b>	No deadline set by HMICFRS	Actions against these recommendations have been held at WHITE for a considerable time pending direction from the NPCC lead for Stalking and Harassment. Without this guidance, Forces have been reluctant to move forwards with actions should they not be in line with revised national guidance that was expected.  However, since October 2018 this has now been devolved to individual Chief Constables. The Force has set itself a deadline of April 2019 to review and implement required changes. This work is being scoped and led by the Head of PPU.
10	Chief constables should work with criminal justice partners to identify what programmes are available to manage offenders convicted of harassment and stalking offences in their respective force areas. In the absence of such programmes, they should review whether interventions could and should be established.	<b>AMBER</b>	A deadline of April 2019 has been set	
11	Chief constables and CPS Area leads should monitor and ensure compliance with the national stalking protocol.	<b>AMBER</b>		

# PEEL: Police Effectiveness 2016

A National report by HMIC

Published March 2017

There are 5 recommendations; 4 of which apply to force. 2 are complete, 1 is closed because London does not have a ROCU and 1 is in progress [College of Policing guidance is now finalised].

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>1b</p> <p><i>Context: In Recommendation 1a the College of Policing working with the NPCC and APCC should issue national guidance setting out the essential elements of neighbourhood policing which all forces should provide. This to be completed by December 2017.</i></p> <p><b>Recommendation 1b</b> Immediately after the national guidance has been issued, all forces should review their own approach to neighbourhood policing to determine whether the service they provide to local communities meets these guidelines. As soon as practicable thereafter, they should put into effect any necessary changes to implement the national guidance.</p>	<p><b>NEW GREEN</b></p>	<p>Sept 2018 as per published guidance</p>	<p>The College of Policing were to publish the final version of their guideline in April 2018, however this was delayed by 2 consultations the college undertook. The final version of the guidance was republished in September 2018.</p> <p>However a report was presented to the Transform Board on 25th April 18 re Community Engagement Services detailing early opportunities to focus on relevant areas of the Corporate Plan and the College of Policing's new (draft) Neighbourhood Policing Guidance with proposals re realignment of resources. This approach was also ratified at the Forces Strategic Management Board in September 2018.</p> <p>Further reports will be presented to scheduled Transform Boards if necessary for any further changes.</p> <p style="text-align: right;"><i>[1.1b]</i></p>

# PEEL: Police Effectiveness 2016 - CoLP

A Force report by HMIC -Published March 2017 There are a total of 13 actions for the force and are complete.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>10</p> <p><b>Areas for improvement</b> The force should improve its understanding, across the government's national 4P framework, of the impact of its activity against serious and organised crime, and ensure that it learns from experience to maximise the force's disruptive effect on this activity</p>	GREEN	<p>Sept 17 [internal deadline]</p> <p>Revised to: January 2018</p>	<p>The role of lead responsible officer [LRO] has been raised to a minimum level of Inspector rank to take responsibility for serious and organised crime intelligence and organised crime mapping. The role and responsibilities of LROs have been documented.</p> <p>Additionally:</p> <ul style="list-style-type: none"> <li>• Newly appointed LROs have nominated leads for the PREVENT, PROTECT and PURSUE elements of their management plans.</li> <li>• Management plans are reviewed by Directorate Serious and Organised crime leads for compliance.</li> <li>• LROs review their management plans to maximise the impact of using partner agencies / third sector organisations where expedient to do so.</li> <li>• LROs review their management plans to secure cross-Directorate resources using the tactical tasking and co-ordination process (TTCG).</li> </ul> <p>Actions are reviewed at Directorate level Serious and Organised crime meetings.</p> <p><b>Task Required:</b> Ensure that training is planned for Lead Responsible Officers</p> <p><b>Current Position:</b> A specific training for lead responsible officers has been created and is being scheduled. In addition this subject area has been added to the Continuing Professional Development programme.</p>
	NEW GREEN	June 2018	

Recommendations & Areas for Improvement		Status	Due Date	Comment
12	<p><b>Areas for improvement</b></p> <p>The force should improve its understanding of the impact of its activity on serious and organised crime and ensure that it learns from experience to maximise the force's disruptive effect on this activity.</p>	<p><b>NEW GREEN</b></p>	<p>Sept 17 [internal deadline]</p> <p>Revised to: March 2018</p>	<p>The roles and responsibilities of Lead Responsible Officer have been reviewed and redefined. These roles are now held at a minimum level of Inspector rank.</p> <p>Debrief reports are now produced and held centrally on a database, these reports include specific recommendations, progress against which are tracked on a database.</p> <p>The governance structure has been reviewed and enhanced to ensure that appropriate oversight of disruptions is in place and provide an opportunity for challenge and learning. The force Serious and Organised Crime meeting is chaired by Commander Operations.</p> <p>Disruption panels are planned this will further enhance the process.</p>

# Best Use of Stop and Search Scheme revisit 2016

A Force report by HMIC  
Published February 2017

HMIC reported that following a revisit in November 2016 they found that the force was compliant with the Best Use of Stop and Search scheme having previously failed on 2 requirements.

HMIC further advised that the force's monitoring and analysis could be further enhanced and these suggestions have been accepted and are reported below.

Total of 3 actions: relevant to the force, 2 are complete and 1 to be progressed.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<b>Areas for Enhancement</b> Enhance monitoring data on:			
1	the reason for searches (e.g. drugs) by ethnicity and age	<div style="background-color: red; color: white; text-align: center; padding: 5px;"><b>RED</b></div>	April 2017 [internal deadline]  Now Due: November 2018  Q4 2017/2018 S&S analysis provided to Performance Sub in April 2018 met recommendation 2 and 3 with details relating to officers provided to the Chair of the stop & search and use of force working Group.  Publication of the stop and search dashboard was recommended with quarter 1 2018/2019 – however analysis of the reasons for searches by ethnicity and age remains outstanding and is being worked on for quarter 2 2018/2019 to be published November 2018.

# PEEL: Police Legitimacy 2016 – National

A National report by HMIC

Published December 2016

Total of 3 actions are relevant to the City of London Police and are complete.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p><b>Cause of concern</b> HMIC is concerned that some forces are failing to comply with current national vetting policy. This means that these forces are employing individuals who have not undergone even basic vetting checks, which represents a significant risk to the integrity of the organisation.</p>	GREEN	June 2017	<p><u>Within 6 months</u> The Head of Professional Standards confirms that current national vetting standards are being compiled with.</p> <p>New national guidelines were expected in 2017 but their publication has been delayed with no new timescales announced.</p> <p>The Professional Standards Control Strategy has been produced and vetting is fully referenced in it.</p>
<p><b>Recommendation</b> To address this cause of concern, HMIC recommends that:</p> <ul style="list-style-type: none"> <li>• Within six months, all forces not already complying with current national vetting policy should have started to implement a sufficient plan to do so.</li> <li>• Within two years, all members of the police workforce should have received at least the lowest level of vetting clearance for their roles.</li> </ul>	NEW GREEN	December 2018	<p><u>Within 2 years</u> Vetting clearance is already embedded within recruitment processes. Steps have been taken to ensure appropriate vetting levels are maintained for officers and staff transferring roles within force.</p> <p>A directory of roles requiring enhanced vetting has been compiled and is detailed in the force's vetting SOP.</p> <p>As at 8<sup>th</sup> October 2018 there are 36 officers and staff who's vetting is subject to renewal and are being progressed.</p>