

Integrated PEEL Assessment 2018/2019 Action Plan

Areas for Improvement	Status	Due Date	Tasks and current status	Lead Officers
<p>1</p> <p><u>Area for Improvement</u> The Force should improve its use of its crime-recording and management system to better manage its case files and investigative processes.</p>	<p>AMBER</p>	<p>December 2019</p>	<p><u>Tasks</u></p> <ul style="list-style-type: none"> • Identify any training needs arising from audits. • Review the crime allocation process within the Force resolution centre. • Include issues identified from dip samples • Undertake a review of discontinued cases where the suspect has not been identified and the victim does not support the prosecution. <p><u>Current status</u> Since the inspection a number of initiatives have commenced which contribute to identifying issues:</p> <ul style="list-style-type: none"> • <i>Gatekeeper</i> – this position has been re-established to verify the completeness and quality of files before their submission to the Administration of Justice department for processing. Advice and feedback is provided to officers to enhance their knowledge/practises. The Gatekeepers is a member of the Disclosure Working Group enabling direct input regarding 	<p>DCS Crime Directorate</p>

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				<p>related 'file quality' and Niche [crime and intelligence] system issues.</p> <p>The CPS submit to the Force details of cases 'failures' associated with volume crime, these are reviewed, trends and officers requiring additional input are identified and progressed; summary results are reported into the Disclosure Working Group.</p> <ul style="list-style-type: none"> • <i>Weekly Offender Management Meeting</i> – Chaired by the DCI Crime this group manages performance levels of 'All outstanding suspects and warrants'. Issuing corrective actions to be taken and guidance to supervisors overall numbers of outstanding suspects is falling. 	
2	<p><u>Area for Improvement</u> The Force should implement a process to get feedback from vulnerable victims.</p>	AMBER	December 2019.	<p><u>Tasks</u></p> <ul style="list-style-type: none"> • Review the current feedback process to establish if responses from victims can be improved. • Benchmark with forces to establish their feedback processes for vulnerable victims. • Identify the 'other vulnerable victims' to be contacted and incorporate into the existing feedback process. 	DCS Crime Directorate

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			<p><u>Current Status</u> HMICFRS recognised in their report that the Force has a process to collect feedback from domestic abuse victims and victims with mental health concerns. However the identified gap is that feedback is not sought from other vulnerable victims.</p> <p>The feedback process is administrated by the Independent Domestic Abuse Advisor [IDVA], currently a part time vacancy exists which is being recruited to [at vetting stage]. Once the new IDVA has commenced, expansion of the feedback into other areas of vulnerability will begin.</p>	
<p>3</p> <p><u>Area for Improvement</u> The Force should implement the necessary processes to share information with schools in relation to children affected by domestic abuse incidents, to ensure information is shared as quickly and effectively as possible.</p>	<p>AMBER</p>	<p>December 2019.</p>	<p><u>Tasks</u></p> <ul style="list-style-type: none"> • City schools to sign-up to Op Encompass. • Dedicated Safeguarding leads within each school to be identified. • Schools to be trained to use the system [Op Encompass] by the Public Protection Unit. <p><u>Current Status</u> At the time of the inspection HMICFRS were aware of the Force’s plans to implement Op Encompass; sharing information with schools in relation to children affected by domestic abuse incidents.</p>	<p>DCS Crime Directorate</p>

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			<p>The Force, City schools and the MPS are adopting Op Encompass, an initiative already in place in other forces and recognised by HMICFRS.</p> <p>Leads in City Schools have been identified through prior contact by the Public Protection Unit [PPU]</p> <p>Training for the schools [by Public Protection Unit staff] and formal 'signup' by schools are the next steps with anticipated implementation the start of the next Academic year [September 2019].</p> <p>MPS plans for implementation are phased, initially starting with individual boroughs [child lives and attends school in the same area] and then progressing to cross boarder [child lives in one borough but attends school in another or the City].</p> <p>The speed of MPS implementation will impact the Force's ability to report to schools a child living in the City but attending school in the MPS area.</p>	
<p>4</p> <p><u>Area for Improvement</u> The Force should improve 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, the powers of other organisations and other tools to deter organised criminals from continuing to offend.</p>	AMBER	December 2019	<p><u>Tasks</u></p> <ul style="list-style-type: none"> • Lifetime Offender Management Team to be recruited and trained • Working practices to be established • Current ancillary orders to be reviewed 	DCS Intelligence and Information Directorate

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			<ul style="list-style-type: none"> • Individual action plans against subjects of orders to be developed and compliance reviewed. • Applications for new ancillary orders to be progressed. • Performance monitoring to be reviewed at the force Serious and Organised Crime Board. <p><u>Current Status</u></p> <p>At the time of inspection the Force was recruiting to the Lifetime Offender Management Team, which subsequently went live in May 2018. There are currently 2 vacancies within the unit which have been advertised internally.</p> <p>Working practices are being established. Work to review ancillary orders has commenced, monitoring of subject compliance with ancillary orders has also begun.</p> <p>Opportunities for new ancillary orders are being examined.</p> <p>Progress made by the unit is reviewed by the Serious and Organised Crime Board.</p>	

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5	<p><u>Area for Improvement</u> The Force should strengthen its response to county lines, which are criminal networks involved in the distribution of drugs to different areas of the country that frequently exploit children and vulnerable people.</p>	AMBER	December 2019	<p><u>Tasks</u></p> <ul style="list-style-type: none"> • Develop partnership engagements • Develop taskings and operations aligned to the risk reduction strategy. • Conduct a peer review • Monitor activities at the Force Serious and Organised Crime Board <p><u>Current Status</u></p> <p>A peer review is to be conducted by the National County Lines Co-ordination Centre, date to be scheduled.</p>	DCS Intelligence and Information Directorate
6	<p><u>Area for Improvement</u> The Force needs to address the deficit it has identified in its medium-term financial plan.</p>	AMBER	December 2019	<p><u>Tasks</u></p> <ul style="list-style-type: none"> • Produce and maintain a medium term financial plan • Identify options to address any deficits <p><u>Evidence</u></p> <p>Since that time of the inspection [December 2018] considerable efforts have been made by the Force and the City of London Corporation to establish a savings plan for 2018/2019 and secure additional funding. This has resulted in a balanced budget for 2019/2020.</p>	Chief Operating and Chief Financial Officer

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				Work continues; a revised medium term financial plan is scheduled for the Autumn Police Authority Board, this will identify any projected deficits which need addressing.	
7	<u>Area for Improvement</u> The Force should ensure that effective external scrutiny takes place in relation to its use of force.	AMBER	December 2019	<u>Tasks</u> <ul style="list-style-type: none"> Engage with the community to attract new members Relaunch the external scrutiny group <u>Current Status</u> Although reflected as separate areas for improvement these both reflect the lack of an external scrutiny group at the time of inspection. Considerable efforts have been made to attract new members to this group and an Introductory day took place on the 11 th June 2019. 6 potential new members attended and processing of formal applications, including vetting are in progress. Draft terms of reference for the group have been produced. The group will initially consider Stop and Search and Use of Force, but feedback will also be sought as to the groups' views regarding other Force practices.	Ch.Supt. Uniform Policing Directorate
8	and <u>Area for Improvement</u> The Force should ensure that effective external scrutiny takes place in relation to its stop and search powers.	AMBER	December 2019		

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			The first meeting of the group will be scheduled once applications have been processed and vetting clearance completed.	
<p>9</p> <p><u>Area for Improvement</u> The Force should extend its unconscious bias training to all its workforce.</p>	<p>AMBER</p>	<p>December 2019</p>	<p><u>Tasks</u></p> <ul style="list-style-type: none"> • Decide if this should be mandatory training for the whole workforce. • Review current training package to ensure it is fit for purpose of the remainder of the workforce who are not front line. • Timetable a rollout programme • Monitor training take-up <p><u>Current Status</u> HMICFRS recognised that most but not all the workforce receive unconscious bias training.</p> <p>The May 2019 Force Training Improvement Board has considered this issue and approved the delivery of unconscious training via an e-learning package. This will be mandatory training for the whole workforce.</p> <p>This action will be complete once the workforce has been instructed and access to the training enabled; currently scheduled for August 2019.</p>	<p>Head of Learning and Development</p>

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<p>10</p> <p><u>Area for Improvement</u> The Force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up-to-date and include current data.</p>	<p>AMBER</p>	<p>December 2019 set to align with the next inspection anticipated early 2020.</p>	<p><u>Tasks</u></p> <ul style="list-style-type: none"> • Establish the format and considerations other forces are utilising for their assessments • Identify any data and intelligence gaps • Peer review by another force <p><u>Current Status</u></p> <p>A template to support the construction of the anti-corruption strategic threat assessment has been agreed by the National Police Analysts working group. This template has been adopted by the Force.</p> <p>The Professional Standard Department has introduced a programme of drop-in sessions which helps to raise force awareness of issues including anti-corruption.</p> <p>The Professional Standards Department have also commenced a series of community engagement exercises, in conjunction with Community Policing. These sessions promote and make Professional Standards more accessible/visible and provides a forum to reinforce acceptable and non- acceptable standards of behaviours of officers and staff in addition to opening new avenues for the reporting of abuse or matters of concern.</p>	<p>Head of Professional Standards</p>

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<p>11</p> <p><u>Area for Improvement</u> The Force should ensure that its counter-corruption unit:</p> <ul style="list-style-type: none"> • has enough capability and capacity to counter corruption effectively and proactively; • can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the force’s data and identify computer misuse; and • builds effective relationships with individuals and organisations that support and work with vulnerable people 	<p>AMBER</p>	<p>December 2019</p>	<p><u>Tasks</u></p> <ul style="list-style-type: none"> • Identify the resources required and submit a growth bid. • Identify any training required for new members of staff • Establish all issues associated interrogating force computer systems and seek to mitigate. <p><u>Current Status</u> HMICFRS has raised issues relating to staffing levels and monitoring of Force IT. A growth bid for an additional 2 people was considered by Resource Allocation Sub Committee [2nd May 2019] and agreed. These posts are yet to be filled.</p> <p>Software has been identified to enhance IT monitoring capability, a financing bid is being prepared.</p> <p>A draft Memorandum of Understanding with the BTP for collaborative working is currently being considered by the City of London Corporation’s legal team; this would significantly improve resilience in this area.</p>	<p>Head of Professional Standards</p>