

**CITY OF LONDON POLICE: OFFICIAL - RECIPIENT ONLY**

## HMICFRS Report Recommendations

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

## Cyber: Keep the light on

A national report by HMICFRS  
Published October 2019

This report makes 5 actions for the force – these are currently being considered. The report was published very close to the committee deadline for papers.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> By 1 November 2020, the Home Office, the Cabinet Office, the National Police Chiefs' Council's lead for cyber crime and Coordinator for Economic Crime, the Director General of the National Crime Agency, and interested parties should revise the current police structure for the response to cyber-dependent crime. In doing so they should consider: <ul style="list-style-type: none"> <li>the creation of a national police cyber-dependent crime network;</li> <li>the remit of any such network;</li> </ul>	AMBER	November 2020	This report was published just before the reporting deadline for committee and the force is considering the recommendations and actions required. This will be updated at the next P&RM Committee.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	<ul style="list-style-type: none"> <li>• how the network engages with other law enforcement agencies; and</li> <li>• the tasking and co-ordinating responsibilities that will be required for the network to be effective.</li> </ul>			
2	<u>Areas for improvement</u> Chief constables should evaluate the use that their force makes of cyber specials and volunteers to ensure that they are used effectively.	AMBER	To be set	
3	<u>Areas for improvement</u> With immediate effect, City of London Police should provide the Home Office with details of how the force intends to address the issue of reports being held in 'quarantine' within the Know Fraud system. Furthermore, the force should also identify its proposals to prevent a re-occurrence.	AMBER	To be set	
4	<u>Areas for improvement</u> The National Police Chiefs' Council's lead for cyber crime and Coordinator for Economic Crime should revise the key performance indicators contained within the council's minimum capability standards for force cyber crime units. The revised standards should make clear: <ul style="list-style-type: none"> <li>• the minimum standards for investigation;</li> <li>• the role of regional cyber crime co-ordinators in the recording, management, and review of cyber crime investigations; and</li> <li>• the use of the weekly list provided by the National Fraud Intelligence Bureau to comply with the performance indicators.</li> </ul>	AMBER	To be set	
5	<u>Areas for improvement</u> The National Police Chiefs' Council Coordinator for Economic Crime should review the role the National Economic Crime	AMBER	To be set	

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	Victim Care Units in providing advice and support to victims of cyber-dependent crime.			

## Shining a light on betrayal: Abuse of position for a sexual purpose

A national report by HMICFRS

Published September 2019

This report makes 6 recommendations, 1 sub-divided. 4 are for the force, 1 complete and 3 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> All forces that are not yet doing so should immediately comply with all elements of the national guidance on vetting. By July 2020, all forces that haven't yet done so should vet all personnel to the appropriate standard. Forces should also have a clear understanding of the level of vetting required for all posts, and the level of vetting held by all their officers and staff. Forces should make sure all personnel have been vetted to a high enough level for the posts they hold.	NEW GREEN	July 2020	The force is compliant in this area.  There is a clear understanding of the level of vetting required for all posts; posts with enhanced vetting are detailed in the vetting SOP.  The vetting levels of the workforce are known and held on a database.  All personnel are vetted to appropriate levels for their posts – a reconciliation exercise was undertaken in 2017 and since that time appropriate processes have been maintained to ensure compliance.
2	<u>Recommendation</u> By April 2020, the NPCC lead for vetting and the College of Policing should devise a standardised list of information that should be shared between forces when someone transfers from one force to another. As a minimum, we would expect this to include information on performance, sickness, complaints, business interests, notifiable associations and any	WHITE	April 2020	This action is for the NPCC lead for vetting and the College of Policing

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	other corruption intelligence. All forces should then adopt this as soon as reasonably practicable.			
3	<u>Recommendation</u> By September 2020, the NPCC lead for counter corruption and the Home Office should work together with software suppliers to provide a solution to enable all forces to implement proactive ICT monitoring. By September 2020, the NPCC should also work with forces to establish a standardised approach to using the information that ICT monitoring software provides.	WHITE	September 2020	This action is for the NPCC lead for counter corruption and Home Office
4a	<u>Recommendation</u> By April 2020, all forces that haven't yet done so should: <ul style="list-style-type: none"> <li>• record corruption using the national corruption categories;</li> <li>• produce a comprehensive annual counter-corruption strategic threat assessment, in line with the authorised professional practice; and</li> <li>• establish regular links between their counter-corruption units and those agencies and organisations who support vulnerable people.</li> </ul> Where forces are yet to implement an effective ICT monitoring system that allows them to monitor desktop and handheld devices, they should do so as soon as reasonably practicable.	AMBER	April 2020	These 2 recommendations are currently being reviewed by the new D/Supt PSD. An action plan is in development.
4b	<u>Recommendation</u> By September 2020, all forces should have completed a review of their use of encrypted apps on police ICT systems to understand the risk they pose and to take any necessary steps to mitigate that risk.	AMBER	September 2020	

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5	<u>Recommendation</u> By April 2020, all forces that haven't yet done so should make sure they have enough people with the right skills to look proactively for intelligence about those abusing their position for a sexual purpose, and to successfully complete their investigations into those identified.	AMBER	April 2020	The force is currently recruiting to its counter corruption unit.

## Leading Lights: An inspection of the police service's arrangements for the selection and development of chief officers

A national report by HMICFRS and HMICS [Scotland]

Published August 2019

This report makes 9 recommendations 1 of which is for the force and being progressed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> By 28 February 2020, the College, after consultation with the National Police Chiefs' Council, should draft new regulations that set out the criteria chief constables in England and Wales must apply and the process they must adopt when selecting candidates for SPNAC. The regulations should: <ul style="list-style-type: none"> <li>• be based on the principles set out in the College of Policing's existing guidance on chief officer selection: merit, fairness and openness;</li> <li>• emphasise that SPNAC is open to officers of superintendent rank; and</li> <li>• be suitable for adoption [by order of the relevant oversight bodies] in Police Scotland, the Police Service of Northern Ireland and national policing organisations.</li> </ul>	WHITE	February 2020	This action is for the College of Policing

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Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<u>Recommendation</u> By 31 May 2020, the College should provide: <ul style="list-style-type: none"> <li>• clear information to all potential candidates about the nature of assessments within SPNAC;</li> <li>• access to support and advice which will enable all potential candidates to prepare adequately for SPNAC; and</li> <li>• improved information about the supplementary arrangements for under-represented groups.</li> </ul>	WHITE	May 2020	This action is for the College of Policing
3	<u>Recommendation</u> By 28 February 2020, the College should abolish the SPSAC and instead use all SPNAC assessment exercises when assessing senior police staff, so that warranted and non-warranted candidates are judged on the same basis.	WHITE	February 2020	This action is for the College of Policing
4	<u>Recommendation</u> By 31 December 2019, the College should widen the membership of the professional reference group to include individuals with professional backgrounds in leadership development in other sectors, and experts with an academic and research background, including those who can provide an international perspective.	WHITE	December 2019	This action is for the College of Policing
5	<u>Recommendation</u> By 31 March 2020, the College should commission a truly independent evaluation of SPNAC, to be carried out on a routine basis.	WHITE	March 2020	This action is for the College of Policing
6	<u>Recommendation</u> When reconstituted, the professional reference group should commission a thorough and truly independent review of the SCC. The College should use the outcome to redesign the course as part of a wider programme of continuous	WHITE	No date set by HMICFRS	This action is for the professional reference group when reconstituted and the College of Policing.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	professional development. The redesign process should also address the points raised in this inspection report.			
7	<p><u>Recommendation</u></p> <p>By 1 September 2020, the College and the National Police Chiefs' Council should design and operate a new, comprehensive continuous professional development framework for chief police officers and staff that reflects the range of chief officer roles across the United Kingdom and encompasses development opportunities within and beyond policing. It should include specified standards of accreditation and timelines for completion and be supported by a guiding hand to help officers make the best development and career choices.</p>	WHITE	September 2020	This action is for the College and the National Police Chiefs' Council.
8	<p><u>Recommendation</u></p> <p>By 31 July 2020, the College, with support from the National Police Chiefs' Council, HMICFRS, HMICS and police forces, should establish and begin operation of a national workforce planning function for all chief officer posts in the United Kingdom. The function should, as a minimum, include:</p> <ul style="list-style-type: none"> <li>• the maintenance of a skills, competencies and career-history database on eligible candidates;</li> <li>• the maintenance of similar information about the current membership of chief officer teams;</li> <li>• the creation of lists of candidates who fit specific vacancies;</li> <li>• an executive search function to advise forces on candidates who would best complement their existing teams; and</li> <li>• a career support facility to advise candidates on roles and other development opportunities that would help meet their career aspirations.</li> </ul>	AMBER	July 2020	<p>This action is mainly for the College but will require the support of National Police Chiefs' Council, HMICFRS, HMICS and police forces. However, the force can progress collating skills, competencies and career histories of the current chief officer team ahead of any request from the College of Policing.</p> <p>Strategic Development has liaised with Organisational Development and HR to progress.</p>

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9	<u>Recommendation</u> By 1 September 2020, the Home Secretary, Scottish Ministers and the Northern Ireland Policing Board should make regulations / directions: <ul style="list-style-type: none"> <li>• requiring that an officer would be eligible to apply for a chief constable position only if they had served for at least two years in another organisation at chief officer or equivalent level; and</li> <li>• limiting the period of time for which a chief officer post can be filled on a temporary basis to a maximum of 12 months.</li> </ul>	WHITE	September 2020	This action is for the Home Secretary, Scottish Ministers and the Northern Ireland Policing Board

## HMICFRS 2019 inspection of Sussex Police and review of national recommendations for stalking or harassment offences

A force report by HMICFRS. Published April 2019 but all forces made aware August 2019

Whilst this is an inspection of Sussex Police a number of *national* recommendations and areas for improvement were made for forces to comply with.

This report makes 8 areas for improvement for the Police. 4 are relevant to the City of London Police; 2 are complete, 2 are in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	Cause of concern We are concerned that police forces are dealing with breaches of orders in isolation, and are not recognising or properly addressing the wider patterns of victimisation. As a result, forces might not be adequately assessing the risks to some victims, and might not be appropriately investigating and prosecuting cases.  <u>Recommendation</u> Within six months, chief constables should ensure that forces record stalking or harassment crimes if appropriate when victims report breaches of orders.	NEW GREEN	February 2020	All cases of this nature are dealt with by Public Protection Unit who have confirmed that they deal with the suspect for the breach in addition to any criminal offences.  The Public Protection Unit protection responsibilities extend to stalking, harassment and domestic abuse – any breaches of orders are identified at an early stage in investigations



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Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<u>Recommendation</u> Within six months the National Police Chiefs' Council (NPCC) lead and the CPS lead should consider whether they can do more to inform police officers and lawyers of the importance of treating breaches of orders as evidence of a wider pattern of offending, and when and as further evidence of stalking or harassment.in what circumstances officers and lawyers should treat this as further evidence of stalking or harassment.	WHITE	February 2020	This action is for National Police Chiefs' Council (NPCC) lead and the CPS lead
3	<u>Recommendation</u> Within six months chief constables should ensure that officers are aware of the importance of treating breaches of orders, where appropriate, as part of a wider pattern of offending, and ensure that force policy and guidance helps officers to do this.	AMBER	February 2020	Public Protection Unit responsibilities extend to stalking, harassment and domestic abuse – relevant SOPs are currently being reviewed to ensure they are fit for purpose in respect of 'breaches of orders'.
4	Cause of concern We remain concerned that there is no single definition of stalking that all police forces and government departments have adopted. As a result, police forces are not consistently identifying stalking, and are not protecting victims as a result.  <u>Recommendation</u> We recommend that within six months the NPCC lead for stalking and harassment reviews whether all police forces should adopt one single definition of stalking, and that the Home Office works with the NPCC lead and partners nationally to review whether a cross-government definition of stalking could and should be adopted.	WHITE	February 2020	This action is for NPCC lead for stalking and harassment.
5	Cause of concern We are concerned that forces have not properly implemented the changes made to the Home Office Counting Rules for Recorded Crime, as they relate to malicious communication offences, stalking or harassment. It is possible that forces	NEW GREEN	November 2019 to the NPCC	This action is for NPCC lead for stalking and harassment, but will require a response by the force.

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	<p>might not be properly assessing the risks to victims and the likelihood of repeat offending.</p> <p><u>Recommendation</u> We recommend that within three months the NPCC lead for stalking and harassment writes to chief constables to reinforce the importance of making sure that crimes which forces are recording as malicious communications are properly assessed, to see if forces should also be recording them as stalking or harassment.</p>			<p>The Force Crime and Incident Registrar will be including the recording of malicious communications within their audit plan.</p> <p>An initial audit has been conducted and identified a small number of missed malicious communications crimes since April 2019.</p>
6	<p><u>Cause of concern</u> We are concerned that forces are not protecting victims of harassment as well as they could, because they are not using injunctions to prevent nuisance and annoyance consistently.</p> <p><u>Recommendation</u> We recommend that within six months the NPCC lead for stalking and harassment reviews the use of injunctions to prevent nuisance and annoyance to protect harassment victims. Following this review, if necessary the NPCC lead should write to chief constables to ensure that forces routinely consider such powers when dealing with victims of harassment.</p>	WHITE	February 2020	This action is for the NPCC lead for stalking and harassment
7	<p><u>Cause of concern</u> We are concerned that police forces do not use the power of entry and search effectively, and therefore stalking investigations are not as thorough as they could be.</p> <p><u>Recommendation</u></p>	WHITE	November 2020	This action is for the NPCC lead for stalking and harassment

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	<p>We recommend that within three months the NPCC lead for stalking and harassment reminds chief constables of the need to ensure that:</p> <ul style="list-style-type: none"> <li>Officers are aware of the powers of entry and search for stalking, and use them appropriately; and</li> <li>Forces compile adequate records of these searches for audit and compliance purposes.</li> </ul>			
8	<p><u>Area for Improvement</u></p> <p>Within three months the NPCC lead for stalking and harassment should remind chief constables that they should regularly monitor compliance with the national stalking protocol, and ensure that suitable governance arrangements are in place for them to do so.</p>	AMBER	November 2019	<p>This action is for the NPCC lead for stalking and harassment and Chief Constables</p> <p>Although the AFI is for the NPCC Lead, the Force has taken the requirement on board and work is in progress to ensure the Public Protection Unit and Administration of Justice produce a joint report for Crime Standards Board oversight.</p>

## Crime Data Integrity inspection 2019

A force report by HMICFRS, published August 2019

This report makes 6 areas for improvement for the Police, these are in progress

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><u>Area for Improvement</u></p> <p>The force should immediately improve crime recording processes, to make sure it records crimes within 24 hours as required by the national crime recording standard</p>	AMBER	February 2020	<p>Crimes are now raised within Control from the Computer Aided Despatch (CAD) incident record, this went live 24<sup>th</sup> June 2019. Timeliness of crime recording is monitored and reported to Crime Standards Board.</p> <p>NCRS requires crime to be recorded within 24 hours, the force has improved its position to 83% from 75% at the time of inspection and is being monitored. This is expected to increase further as the force</p>

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				embeds a process which reconciles City crimes from force incidents records [CAD] and the MPS crime system. Once this is demonstrated to be working, this AFI will be GREEN. Numbers and timeliness of recording Modern Slavery have been reviewed – no under recordings has been identified and volume is low.(Only 2 crimes YTD)
2	<u>Area for Improvement</u> The force should immediately improve officer and staff understanding of the correct use of the N100 classification	AMBER	February 2020	N100 audits are being undertaken to ensure the appropriate numbers are being recorded. Next steps: Specific refresher training is in development with regard to reported incidents of rape [N100] <sup>1</sup> .
3	<u>Area for Improvement</u> The force should immediately improve its standard of violent crime cancellation decisions	AMBER	February 2020	Force Resolution Centre staff have been trained to be able to cancel lower levels crime of this type where appropriate, including the requirement inform the victims.
4	<u>Area for Improvement</u> The force should immediately improve how often it informs victims when it has decided to cancel or transfer their crimes to another force	AMBER	February 2020	More serious crimes can only be cancelled by the DCI crime or the Force Crime and Incident Registrar who are aware of this requirement. Next steps: Audits are scheduled in the next reporting period to ensure compliance, the results of which will determine if this AFI can be classified as delivered.
5	<u>Area for Improvement</u> The force should immediately improve its collection and analysis of equality data through its crime reporting and recording systems	AMBER	February 2020	It has been confirmed that the required information can be collected on force system. Next steps: Officers and staff are to be briefed on the requirement and how to record on the force system.

<sup>1</sup> N100 - A record created to describe why reported incidents of rape or attempted rapes, whether from victims, witnesses or third parties, have not been immediately recorded as a confirmed crime. This can include where additional information confirms the rape did not occur, or where the rape occurred in another force area and was therefore transferred to the relevant force to record and investigate.

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				Thereafter, the Performance Information Unit will analyse the data.
6	<u>Area for Improvement</u> The force should immediately improve its use of cannabis warnings, penalty notices for disorder and community resolutions, to make sure it only issues them in accordance with national guidance.	AMBER	February 2020	In response to the HMICFRS report refresher training has been developed and rollout commenced late September 2019. Next steps: Compliance with national guidance will be evidenced by audits undertaken by the Force Crime and Incident Registrar and reported to the Crime Standards Board.

## The Poor Relation - The police and CPS response to crimes against older people

A national report by HMICFRS, published July 2019

This report makes 23 recommendations, 5 of which are for force – 2 completed and 3 in progress

Recommendations & Areas for Improvement		Status	Due Date	Comment
8	Cause of concern The police don't consistently assess the needs of victims as set out in the relevant codes of practice and so the needs of victims aren't always met.  <u>Recommendation</u> Within six months, chief constables should make sure that victim needs assessments are always completed.	AMBER	January 2020	The forces operates a opt out process in referring victims to victim support – this is the preferred option by HMICFRS The offering of victim needs assessments is part of the qualitative dip samples undertaken by the Crime Directorate. Next steps: The results of recent dip samples will be examined to ensure that all necessary action is being taken.

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9	<p>Cause of concern Chief constables don't understand well enough the current demand for adult safeguarding arrangements, and haven't considered the likely future demand and the implications for forces.</p> <p><u>Recommendation</u> Within three months, chief constables should conduct analysis of the current and future demand for adult safeguarding, including the gap in knowledge that may exist from those cases where referrals aren't made because of errors or omissions. This analysis should be incorporated into force management statements (FMSs).</p>	NEW GREEN	October 2019	<p>All adult safeguarding requests are received by the Public Protection Unit as public protection notices [PPN] from the force's crime recording system (Niche).</p> <p>Numbers total circ. 50 per month and are assessed for appropriate next steps including the option of referral to local authority safeguarding teams.</p> <p>Demand currently remains stable and is monitored at the Vulnerability Working and Steering Groups as part of its dashboard. The public protection unit attend the force's daily crime meeting, thus providing an opportunity to spot errors / omissions in PPN referrals.</p> <p>The HMICFRS report references forces' needs to understand the demand local authorities make under section 42 of the Care Act 2014. For the City these are extremely rare – demand is fully understood by the force.</p> <p><i>[The Care Act 2014 (Section 42) requires that each local authority must make enquiries, or cause others to do so, if it believes an adult is experiencing, or is at risk of, abuse or neglect. An enquiry should establish whether any action needs to be taken to prevent or stop abuse or neglect, and if so, by whom.]</i></p> <p>Demands upon the force are included within the Force Management Statement.</p>
10	<p>Cause of concern Some victims may not be receiving support services, and some support services don't work as well as they could. This is because the police don't always refer victims when they</p>	AMBER	January 2020	<p>The HMICFRS Fraud report highlights the force's initiative the National Economic Crime Victim Care Unit as a good example of law enforcement attempting to identify and respond to vulnerability.</p>

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	<p>should, support services don't have ready access to police information, and witness care arrangements are sometimes provided separately.</p> <p><u>Recommendation</u> Within six months, chief constables should work with police and crime commissioners and their mayoral equivalents, and other relevant organisations, to review whether victim support services can be provided in a better way.</p>			<p>A significant number of these victims will be older people.</p> <p>With regard to non-economic crime victims: The force undertakes dip samples to identify learning which is then reported to the Crime Standards Board, these dip samples include qualitative checks on the service provided.</p> <p>Next steps: Victims code of practice compliance and MG2 special measures submissions are to be examined to ensure appropriate standards are being achieved.</p>
11	<p>Cause of concern Some adults who need safeguarding are being put at risk because the police aren't always referring cases to partner organisations, and there are no effective measures to ensure that referrals have been made.</p> <p><u>Recommendation</u> Within three months, chief constables should ensure that adult safeguarding referrals are always made when appropriate, with effective processes in place to make sure this happens. The NPCC lead for adults at risk should advise chief constables as to how this is best achieved.</p>	NEW GREEN	October 2019	<p>All adults safeguarding referral are handled by the force's Public Protection Unit. Demand levels are known and average 50 per month.</p> <p>Opportunities to identify omissions are covered by the Public Protection Unit's attendance at the daily crime meeting.</p>
17	<p><u>Area for improvement</u> Within six months, chief constables should find good ways to assess the current demands on the police made by older people. These assessments should include a prediction of future changes in demand, account for the work of other organisations, and be incorporated into FMSs.</p>	AMBER	January 2020	<p>Next steps: An analysis of all crime types, banded by the age of victims has been commissioned. This will enable the force to track trend changes</p>

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## PEEL 2018/2019

A national report by HMICFRS, published May 2019

This report makes 11 areas for improvement for the force, 1 is complete 10 are in progress

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><u>Area for Improvement</u></p> <p>The force should improve its use of its crime-recording and management system to better manage its case files and investigative processes.</p>	AMBER	<p>No deadline set by HMICFRS</p> <p>December 2019 set to align with the next inspection</p>	<p>The following actions have been undertaken:</p> <ul style="list-style-type: none"> <li><i>Gatekeeper</i> – this position has been re-established to verify the completeness and quality of files before there submission to the Administration of Justice department for processing. Advice and feedback is provided to officers to enhance their knowledge/practises.</li> <li><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.</li> </ul> <p>Task to be completed:</p> <ul style="list-style-type: none"> <li>A review of discontinued cases where the suspect has not been identified and the victim does not support the prosecution need to take place. Once complete, this will be GREEN.</li> </ul>
2	<p><u>Area for Improvement</u></p> <p>The force should implement a process to get feedback from vulnerable victims.</p>	AMBER	<p>No deadline set by HMICFRS</p> <p>December 2019 set to</p>	<p>HMICFRS recognised in their report that the force has a process to collect feedback from domestic abuse victims and victims with mental health concerns [although responses are rare]. However the identified gap is that feedback is not sought from other vulnerable victims. This feedback process is administrated by the Independent Domestic Abuse Advisor [IDVA], currently a part time vacancy exists which is</p>



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			align with the next inspection	being recruited to. The original successful applicant failed vetting and so a new process has commenced.
3	<p><u>Area for Improvement</u></p> <p>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>	AMBER	<p>No deadline set by HMICFRS</p> <p>December 2019 set to align with the next inspection</p>	<p><u>Tasks</u></p> <ul style="list-style-type: none"> <li>• City schools to sign-up to Op Encompass<sup>2</sup>.</li> <li>• Dedicated Safeguarding leads within each school to be identified.</li> <li>• Schools to be trained to use the system [Op Encompass] by the Public Protection Unit.</li> </ul> <p><u>Current Status</u></p> <p>At the time of the inspection HMICFRS were aware of the force's plans to implement Op Encompass; sharing information with schools in the City of London in relation to children affected by domestic abuse incidents.</p> <p>Formal invites to schools to join the scheme have been sent following prior engagement.</p> <p>Training is planned to be delivered to schools in November 2019 coinciding with a Domestic Violence Campaign.</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>

<sup>2</sup> Operation Encompass is supporting children through key adults. Operation Encompass is the reporting to schools before 9am on a school day when a child or young person has been involved or exposed to a domestic abuse incident the previous evening.

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4	<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.	<b>NEW GREEN</b>	No deadline set by HMICFRS  December 2019 set to align with the next inspection	At the time of inspection the force was recruiting to the Lifetime Offender Management Team, which subsequently went live in May 2019. These posts have now been filled.  Working practises have been established. Existing ancillary orders in this area have been reviewed and a monitoring regime established. SOPs for Lifetime Offender Management, Integrated Offender Management and Ancillary Orders have been produced and published on the force intranet.
5	<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.	<b>AMBER</b>	No deadline set by HMICFRS  December 2019 set to align with the next inspection	The force has requested a peer review, this to be conducted by the National County Lines Co-ordination Centre 20 <sup>th</sup> and 21 <sup>st</sup> November 2019 – this will inform future actions.  Awareness in force of how to recognise county line issues continues.
6	<u>Area for Improvement</u> The force needs to address the deficit it has identified in its medium-term financial plan.	<b>AMBER</b>	No deadline set by HMICFRS  December 2019 set to align with the next inspection	Since that time 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.  Work continues; a revised medium term financial plan is scheduled for submission to the Police Authority Board November 2019, this will identify any projected deficits which need addressing.

## CITY OF LONDON POLICE: OFFICIAL - RECIPIENT ONLY

Recommendations & Areas for Improvement		Status	Due Date	Comment
7	<u>Area for Improvement</u> The force should ensure that effective external scrutiny takes place in relation to its use of force.	AMBER	No deadline set by HMICFRS  December 2019 set to align with the next inspection	<p>Both of these areas are scrutinised by the Police Authority Board with reports due on both Use of Force (as part of a Custody update) and stop and search, at its November 2019 meeting.</p> <p>Considerable efforts have been made to attract new members to the newly formed Force Community Scrutiny/ Independent Advisory group and an Introductory day took place on the 11<sup>th</sup> June 2019. The first meeting of the group took place on the 4<sup>th</sup> September 2019, but these topics were not on the agenda. Dates are currently being considered for future meetings at which data will be presented and discussed.</p>
8	<u>Area for Improvement</u> The force should ensure that effective external scrutiny takes place in relation to its stop and search powers.	AMBER	No deadline set by HMICFRS  December 2019 set to align with the next inspection	
9	<u>Area for Improvement</u> The force should extend its unconscious bias training to all its workforce.	AMBER	No deadline set by HMICFRS December 2019 set to align with the next inspection	<p>A training package has already been developed, a timetable set commencing late November 2019</p> <p>Completion of training by the workforce will be monitored and reported in force.</p>

## CITY OF LONDON POLICE: OFFICIAL - RECIPIENT ONLY

Recommendations & Areas for Improvement		Status	Due Date	Comment
10	<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.	AMBER	No deadline set by HMICFRS December 2019 set to align with the next inspection	These documents have been reviewed for 2018/2019 and will be re-evaluated for 2019/2020.
11	<u>Area for Improvement</u> The force should ensure that its counter-corruption unit: <ul style="list-style-type: none"> <li>• has enough capability and capacity to counter corruption effectively and proactively;</li> <li>• 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</li> <li>• builds effective relationships with individuals and organisations that support and work with vulnerable people.</li> </ul>	AMBER	No deadline set by HMICFRS December 2019 set to align with the next inspection	HMICFRS has raised issues relating to staffing levels and monitoring of force IT. The force made a growth staff bid to Resources Allocation Sub [2 <sup>nd</sup> May 2019] which was agreed – recruitment process was run internally, however no candidates were appointed and the force has now advertised externally to fill the posts. The force has identified software that enables more effective monitoring of force IT – a capital bid is being prepared.

## Fraud: Time to Choose

A national report by HMICFRS, published April 2019

This report makes of which 13 recommendations and 5 areas for improvement for the police. 8 are complete and 10 are in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should publish a timetable for implementing the revised Know Fraud system, making clear	NEW RED	September 2019	A letter has been drafted to all forces addressing this action. The decision to release the letter will be taken by the Programme Board, membership of which includes the contractor providing Know Fraud.

## CITY OF LONDON POLICE: OFFICIAL - RECIPIENT ONLY

Recommendations & Areas for Improvement		Status	Due Date	Comment
	<p>which services are to become available at each stage of implementation and thereby enabling forces to make use of each service as early as practicable.</p> <p>The use made of the system by police forces should be monitored and evaluated to identify best practice.</p>			If approved this letter will be issued late November 2019. This is a complex issue and a delay has been experienced owing to the number of stakeholders involved.
2	<p><u>Recommendation</u></p> <p>By 31 March 2020, the National Police Chiefs' Council Coordinator for Economic Crime and chief constables should ensure that forces have processes in place to accurately and efficiently report fraud outcomes to the National Fraud Intelligence Bureau.</p>	AMBER	March 2020	<p>New guidance was issued to forces late September 2019. The production of monthly exception report [these support accuracy and efficiency] have entered the testing stage help to hold force to account.</p> <p>Next Steps</p> <p>A database to monitor outcomes against disseminations is being developed.</p>
3	<p><u>Recommendation</u></p> <p>By 31 August 2019, the Economic Crime Strategic Board should extend its remit to include all forms of fraud against individuals and businesses, not just serious and organised fraud.</p>	GREEN	August 2019	This action is for the Economic Crime Strategic Board
4	<p><u>Recommendation</u></p> <p>By 30 September 2019, the Home Office should publish information concerning its agreement with City of London Police to act as the national lead force for fraud. The published information should include (as a minimum) descriptions of:</p> <ul style="list-style-type: none"> <li>the aims and objectives of the agreement;</li> <li>the funding arrangement;</li> <li>accountability and governance processes; and</li> <li>City of London Police's performance against the agreement.</li> </ul>	GREEN	September 2019	<p>This action is for the Home Office, however the force is an active participant.</p> <p>The Home Office have published as required.</p>
5	<p><u>Recommendation</u></p> <p>The National Police Chiefs' Council (NPCC) Coordinator for Economic Crime, in consultation with the Home Office and the Director General of the National Economic Crime Centre,</p>	AMBER	March 2020	A Strategy has been developed; consultation has taken place with PCCs, NECC and other priority stakeholders.

## CITY OF LONDON POLICE: OFFICIAL - RECIPIENT ONLY

Recommendations & Areas for Improvement		Status	Due Date	Comment
	<p>should develop a national policing strategy for fraud and, by 31 March 2020, secure its approval by the NPCC for adoption by all police forces. The strategy should:</p> <ul style="list-style-type: none"> <li>• make clear the roles and responsibilities of police forces and regional organised crime units;</li> <li>• define the relationship between City of London Police as the national lead force, the National Crime Agency (in particular the National Economic Crime Centre) and other relevant bodies, seeking to ensure that their respective roles and responsibilities complement each other and avoid duplication; and</li> <li>• define how fraud intelligence will be developed, disseminated and put to effective use by police forces and the National Fraud Intelligence Bureau.</li> </ul> <p>The implementation arrangements for the strategy should include clear communication and review processes.</p>			<p>It is anticipated this will be sent to all forces early November 2019</p> <p>Next Steps</p> <p>The Strategy is to be published and governance is to be established for implementation.</p>
6	<p><u>Recommendation</u></p> <p>With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime, working with the College of Policing, should take responsibility for identifying, evaluating and disseminating best practice advice on the police response to fraud.</p>	NEW GREEN	March 2020	<p>A number of initiatives have been delivered:</p> <ul style="list-style-type: none"> <li>• The establishment of the Economic Crime Hub</li> <li>• The initiation of engagement events</li> <li>• International benchmarking has been developed</li> <li>• There is an ongoing programme to identify and share best practise in victim care</li> </ul>
7	<p><u>Recommendation</u></p> <p>By 31 March 2020, the National Police Chiefs' Council Coordinator for Economic Crime should carry out an evaluation of two National Fraud Intelligence Bureau products: monthly victim lists and six-monthly force profiles. The evaluation should include:</p> <ul style="list-style-type: none"> <li>• consulting with police forces to establish the uses to which these intelligence products are put; and</li> </ul>	NEW GREEN	March 2020	<p><b>Force Profiles:</b></p> <p>In consultation with forces, the following changes have been implemented:</p> <ul style="list-style-type: none"> <li>• 6 monthly force profile have become annual for fraud and cyber – these profiles will focus on the intelligence picture as opposed to the current statistical information.</li> <li>• An interactive dashboard for forces has been developed, this to be updated monthly.</li> </ul>

## CITY OF LONDON POLICE: OFFICIAL - RECIPIENT ONLY

Recommendations & Areas for Improvement		Status	Due Date	Comment
	<ul style="list-style-type: none"> <li>identifying any opportunities to improve the products' utility or reduce the burden on the National Fraud Intelligence Bureau in compiling them.</li> </ul>			<p><b>Victim Lists:</b> Following feedback from and consultation with forces, the decision has been taken to increase the frequency of disseminating the Victim Lists to forces.</p> <p>From June 2019 forces will receive information of victims of fraud residing in their force area on a weekly basis. This move aligns the dissemination frequency of fraud victims with cyber victims. Vulnerability is highlighted on the victim list. Victims aged 17 and under will be disseminated to forces on receipt.</p>
8	<p><u>Recommendation</u> By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should issue guidance to police forces on how to:</p> <ul style="list-style-type: none"> <li>accurately record and report on National Fraud Intelligence Bureau 'disseminations for enforcement' to ensure consistency and clarity for fraud-recording processes (the guidance should reassert the requirement in the Home Office Counting Rules for forces to provide the case number, the crime numbers, the suspect details and the outcome details for each such dissemination);</li> <li>determine their response to National Fraud Intelligence Bureau disseminations for enforcement, ensuring consistency and clarity for victims of fraud; and</li> <li>ensure that, when a force decides not to investigate, or not to continue an investigation, the victim is provided with a clear written explanation of the rationale for that decision.</li> </ul>	NEW GREEN	September 2019	<p>These recommendations will in part be met by the force's response to recommendation 6 above.</p> <p>In addition: Dissemination and calls for services guidance has been issued in late September 2019. This follows a series of engagement and workshops</p>
9	<p><u>Recommendation</u> By 30 September 2019, chief constables should publish their force's policy for responding to and investigating allegations of</p>	NEW RED	September 2019	<p>A draft policy has been produced and is currently at consultation. Internal and external communications are planned following signoff.</p>

## CITY OF LONDON POLICE: OFFICIAL - RECIPIENT ONLY

Recommendations & Areas for Improvement		Status	Due Date	Comment
	fraud (in relation to both calls for service and National Fraud Intelligence Bureau disseminations for enforcement).		Now December 2019	
10	<u>Recommendation</u> With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime, when issuing to police forces advice on fraud protection that is to be given to the public (including alerts and campaigns), should take responsibility for evaluating the effectiveness of how that advice is given to the public and the effectiveness of the advice.	AMBER	March 2020	Steps have been taken towards establishing a Police National Fraud PROTECT network similar to the Police National Cyber PROTECT network operating at a national, regional, and local level. An additional resource has been brigaded into the NFIB PROTECT Team and funding opportunities explored to develop this capability. The immediate ambition for the Fraud PROTECT strand will be to: <ul style="list-style-type: none"> <li>• Create a virtual network of Force Fraud PROTECT Officers</li> <li>• Develop a mechanism to measure output and impact e.g. Engagement Impact Survey(s)</li> <li>• Review and refresh the Fraud PROTECT Implementation Plan</li> </ul> Review of national coordination of Fraud PROTECT and targeted PROTECT messaging through Action Fraud.
11	<u>Recommendation</u> By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should issue guidance to police forces in relation to fraud-related calls for service as described in the Home Office Counting Rules. The advice should make clear to forces the circumstances in which they are expected to intervene and the circumstances in which they may refer the case direct to Action Fraud. The advice should also make clear how: <ul style="list-style-type: none"> <li>• responses to reports of fraud may adequately meet the needs of victims;</li> <li>• vulnerable victims should be identified and dealt with appropriately; and</li> <li>• reports of fraud should be efficiently referred to Action Fraud.</li> </ul>	NEW GREEN	September 2019	The required guidance has been produced and circulated to forces, comprising of 2 guides: Calls for Services and Vulnerable Victims.  The force has also engaged with the Home Office single online home project to ensure fraud reporting is compatible with best practice and policy.



## CITY OF LONDON POLICE: OFFICIAL - RECIPIENT ONLY

Recommendations & Areas for Improvement		Status	Due Date	Comment
12	<u>Recommendation</u> By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should redesign the National Fraud Intelligence Bureau dissemination for enforcement documentation to make it easier for recipients to interpret and use.	NEW GREEN	September 2019	Following consultations with forces a revised disseminations template has been produced and issued to NFIB supervisors and crime reviewers mid-October 2019.  This template was accompanied with guidance.
13	<u>Recommendation</u> With immediate effect, the Director General of the National Crime Agency, in consultation with the National Police Chiefs' Council Coordinator for Economic Crime, should ensure that the tasking powers of the National Crime Agency are used effectively in the case of serious and organised fraud.	WHITE		This action is for the Director General of the National Crime Agency, however, the escalation process is now ready for circulation. CoLP continues to engage with National Crime Agency tasking to ensure Fraud is appropriately represented.  An escalation process has been introduced for policing and CoLP is represented in ongoing work to develop an effective national tasking process for serious and organised crime.
14	<u>Recommendation</u> With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime should: <ul style="list-style-type: none"> <li>• carry out (and subsequently evaluate) a campaign to raise the public awareness of the existence and role of Action Fraud; and</li> <li>• provide chief constables with a description of the role of Action Fraud for uploading to force websites.</li> </ul>	AMBER	March 2020	A draft campaign strategy has been produced and shared with the Home Office which has agreed a multi-agency approach. The campaign is not expected to start until March 2020. Advertising space to support the campaign messaging is secured, including signage at televised sports events and radio adverts.
15	<u>Recommendation</u> With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime should take steps to remedy the absence of published performance indicators at Action Fraud. As soon as practicable, performance indicators should be set in relation to, for example, call handling waiting times and abandonment rates, online reporting and victim	NEW GREEN	August 2020	Performance indicators have been developed and published [on the Action Fraud website] in line with this recommendation.  A standard of service has also been published to inform the public.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	satisfaction levels. Thereafter, information on performance against those indicators should be published.			
16	<u>Recommendation</u> By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should provide guidance to Action Fraud and chief constables. This is to ensure that, promptly on reporting a fraud, victims are provided with explanations of: <ul style="list-style-type: none"> <li>• the role of Action Fraud;</li> <li>• the process by which their fraud report will be considered for assessment or referral to the police (or other law enforcement agency) by the National Fraud Intelligence Bureau;</li> <li>• how to obtain an update on the progress of their case;</li> <li>• how, following referral from the National Fraud Intelligence Bureau, the decision on whether and how to investigate rests with the police (or other law enforcement agency); and</li> <li>• the options open to victims of fraud to seek civil redress as an alternative (in cases where criminal investigations are not carried out or do not lead to convictions).</li> </ul>	NEW RED	September 2019  Now December 2019	The role of Action Fraud has been published together with a standard of service and includes options open to victims for civil redress.  Key performance indicators are also published on the Action Fraud website.  Next steps A step by step guide is in production.
17	<u>Area for Improvement</u> Chief constables should improve the way their force uses the National Fraud Intelligence Bureau monthly victim lists to identify and support vulnerable victims and others who require additional support.	NEW GREEN	March 2020	Existing processes and arrangements have been reviewed and a SOP published which support this process.  Victims list for the City are small in number and appropriate mechanisms are already in place to provide appropriate support.
18	<u>Area for Improvement</u> Chief constables should ensure their forces improve the identification and mapping of organised crime groups in which the principal criminality is fraud.	AMBER	March 2020	The force already identifies and maps organised crime groups. Identification and mapping are discussed at the force Serious and Organised Crime Board. Next steps: A City and National Lead Force case acceptance policy has been produced – internal publication is pending.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
19	<u>Area for Improvement</u> Chief constables should ensure that fraudsters are included among those considered for serious organised crime 'prevent' tactics, including by local strategic partnership boards and through integrated offender management processes.	AMBER	March 2020	<p>Fraudsters are discussed at the force Serious and Organised Crime Board. Organised crime prevent tactics are included with the fraud case acceptance and review policy – publication pending.</p> <p>The force has a Lifetime Offender Management Unit - its' supervisor provides Fraud SIOs/Lead investigator with an integrated offender management and lifetime offender management options - ancillary orders are being pursued as a result.</p> <p>The Lifetime Offender Management manager now has a standing invitation to the Economic Crime Directorate Tasking meeting to ensure that engagement is at the earliest stage.</p>
20	<u>Area for Improvement</u> Chief constables should increase their force's use of ancillary orders against fraudsters.	NEW GREEN	March 2020	<p>All ancillary orders have been reviewed.</p> <p>The Lifetime Offender Management team has presented their role, capacity and capability to every ECD team via regular team meetings.</p> <p>The Lifetime Offender Management manager now has a standing invitation to the ECD Tasking meeting to ensure that engagement is at the earliest stage.</p> <p>Opportunities for ancillary orders are fully explored.</p>
21	<u>Area for Improvement</u> Chief constables should ensure that their force complies with the Code of Practice for Victims of Crime when investigating fraud.	AMBER	March 2020	<p>Existing arrangements and processes have been reviewed; the HMICFRS report recognised the CoLP has developed a victim contract strategy for use in complex cases and that some other force and regions have adopted it as good practise.</p> <p>Next steps:</p> <p>The Economic Crime Victim Code of Practice is currently being refreshed.</p>

## CITY OF LONDON POLICE: OFFICIAL - RECIPIENT ONLY

# City of London Police – Joint inspection of police custody

A national joint report by HMI Prisons and HMICFRS, published March 2018

This report makes 1 recommendation and 21 areas for improvement for the police. 2 actions are complete, 20 are in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> The force must take immediate action to ensure that all children and vulnerable adults have an appropriate adult present when taking fingerprints, photographs and DNA.	NEW GREEN	December 2019 to align with the HMICFRS return visit	Both the Juvenile Detainees SOP and the Fingerprints and Non Intimate Samples SOP have been reviewed and updated. All custody staff have been briefed and advised by email of their responsibility to compile with PACE and past practise is no longer acceptable. The requirement of recommendation within Custody Refresher training. A specific and relevant question has been included within the dip sample template as part of the safeguarding review.
2	<u>Area for Improvement</u> The force should ensure that there is sufficient oversight of how minimum staffing levels are maintained in the custody suite, and the level of overtime in use to achieve these.	AMBER	December 2019 to align with the HMICFRS return visit	A process is in place to monitor and review the availability of fully accredited staff. Overtime monitoring has been enhanced and authorisation changed to the Custody Manager from the Response Group Inspectors. An alternate process for allocation of resources has been implemented and is controlled by the Custody Inspector. A dedicated Custody staffing group is being established on a 3 month rolling basis sourced from Response Groups, alongside Dedicated Detection Officers and Custody Goalers to improve both experience and skills and to better control cover and requirement for over time. Skills records have been reviewed and are being maintained. Tasks to be progressed: A review will take place to ensure these revised processes are working as required.

## CITY OF LONDON POLICE: OFFICIAL - RECIPIENT ONLY

Recommendations & Areas for Improvement		Status	Due Date	Comment
3	<u>Area for Improvement</u> The force should address the unsatisfactory conditions that some detainees experience in the suite, especially those detained for long periods, and ensure that the facilities and arrangements for detainees with disabilities and those with limited mobility are suitable.	AMBER	December 2019 to align with the HMICFRS return visit	Adaptations and introduction of a 'hatched' 'no loitering area' in reception area are programmed to be delivered during the Suite close down for deep cleaning due in November 2019. Van docking arrangements are now formalised. Tasks to be progressed: Associated requirements to be captured for the new custody facilities. New design guidelines published by Home Office fed into the Accommodation Programme.
4	<u>Area for Improvement</u> The force should ensure that all staff follow the College of Policing Authorised Professional Practice and its own policies and procedures to achieve consistent outcomes for detainees.	AMBER	December 2019 to align with the HMICFRS return visit	A qualitative dip sample has been developed to measure compliance with policies and procedures results to be feedback into refresher training and Custody Management Group. This dip sample has been completed for quarter 1 and is pending for quarter 2. Once the process is seen to be embedded this action will be GREEN.
5	<u>Area for Improvement</u> The force should manage the health care contract effectively, with escalation to a senior level when the service falls below the standard required.	AMBER	December 2019 to align with the HMICFRS return visit	Performance data has been defined, data has commenced but remains a work in progress. Data that has been collated to date has enabled some challenge to the health care provider. Although Custody risks have formed part of the Uniformed Policing Directorate Risk Register previously to date, a specific risk register for custody is now being compiled.
6	<u>Area for Improvement</u> The force should improve its approach to performance management by collecting comprehensive information, and analysing this to show how well the service is performing and identify where improvements are needed.	AMBER	December 2019 to align with the HMICFRS return visit	A performance dashboard is starting to report to the Custody Management Group, but is still a work in progress. Daily and 7 day statistical reports are being generated for use by Custody Management. Dip sampling results from quarter 2 are pending presentation to the Custody User Group [November 2019].
7	<u>Area for Improvement</u> Custody records should be completed to a consistently high standard. The recording of information on detention logs should be sufficiently detailed and include all relevant information. Quality assurance processes should ensure that	AMBER	December 2019 to align with the	A dip sample regime has been establish and reported against quarter 1, quarter 2 results are pending. Once the process is seen to be embedded this action will be GREEN.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	the custody records meet the required standards.		HMICFRS return visit	
8	<u>Area for Improvement</u> The force should analyse data relating to diversity, to ensure that outcomes for all detainees are fair and demonstrate that custody services are meeting the public sector equality duty.	AMBER	December 2019 to align with the HMICFRS return visit	Benchmarking requests have been submitted to all forces – responses being reviewed. Diversity / demographic data is being included with monthly performance reports and presented to the Custody User Group.
9	<u>Area for Improvement</u> Staff should routinely consider, and take any appropriate actions to preserve, detainees' privacy at the booking-in desk.	AMBER	December 2019 to align with the HMICFRS return visit	A mitigation has been identified [laptop to be utilised in a private side room]. This to be communicated to officers and included within Continual Professional Development safeguarding and welfare responsibilities. A 'Hatched' 'no loitering' area in Reception to be marked up to minimise opportunity to view CCTV monitors, scheduled for November 2019.
10	<u>Area for Improvement</u> The approach to managing some elements of risk should be improved. In particular: <ul style="list-style-type: none"> <li>Detainees who are intoxicated should be placed on observation levels that include rousals.</li> <li>Detainees' clothing and footwear should only be removed based on an individual risk assessment.</li> <li>All custody staff should be involved collectively in shift handovers.</li> </ul>	AMBER	December 2019 to align with the HMICFRS return visit	<u>Detainees who are intoxicated</u> Continuing Professional Development sessions are being conducted to address this. Revised Qualitative dip sampling template incorporates checking of rousals. Next steps; Await results of Q2 dip sampling to determine if process embedded. <u>Detainees' clothing and footwear</u> Reminders have been issued to all Custody staff This will be further reinforced at ongoing rolling CPD sessions. L&D trainer advised to incorporate in Custody refresher training package. Dip Sample process considers not only if initial risk assessment completed but also how well completed and if it adequately covers the rational for risks identified.

## CITY OF LONDON POLICE: OFFICIAL - RECIPIENT ONLY

Recommendations & Areas for Improvement		Status	Due Date	Comment
				<u>Collective in shift handovers</u> A new procedure for Custody handovers has been implemented - at this time inclusive handover between Night Duty and Early Turn staff remains unresolved due to differing and non-overlapping shift patterns and the impact of the official start of the force working day. Guidance on requirements for each shift and role was issued in September 2019 and provided alongside a Statement of Expectations for Custody Officers and Dedicated Detection Officers.
11	<u>Area for Improvement</u> The force must consistently meet the requirements of PACE code C for the detention, treatment and questioning of suspects. In particular by: <ul style="list-style-type: none"> <li>consistently issuing an up-to-date rights and entitlement notice to all detainees, translated into the detainee's own language when required (paragraph 3.2 of PACE code C)</li> <li>clearly explaining to detainees who are held 'incommunicado' the reasons for this, and ensuring that it is lifted promptly when the reasons for invoking it have expired (annex B of PACE code C)</li> <li>ensuring that all custody sergeants and staff provide translated documents to non-English-speaking detainees about their detention in their own language (PACE code C Annex M documents).</li> </ul>	AMBER	December 2019 to align with the HMICFRS return visit	<u>Rights and entitlement notice</u> Out of date notices have been withdrawn and replaced with latest versions. Custody staff have been reminded of requirement to provide Rights & Entitlements notice to all detainees reinforced at CPD and Refresher training sessions. Revised qualitative dip sampling template introduced, awaiting results of Q2 dip sampling to evidence embedding of practices. <u>Explain to detainees who are held 'incommunicado' the reasons for this.</u> Reminders have been issued to Custody staff. Revised dip sampling template includes an assessment of whether Rights & Entitlements have been delayed and with sufficient reason. Monitoring of overarching dip sampling results from Q2 2019/2020 onwards will reveal trend analysis and compliance which can then be addressed accordingly [pending]. <u>Ensure all custody staff provide translated documents</u> PACE code C Annex M documentation is now readily accessible via NICHE system. This information/process is being provided to all Custody Officers via CPD session and through Custody Initial and Refresher training. Revised dip sampling template includes a specific test for this.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
				Result of future dip samples to identify if the required change has been embedded.
12	<p><u>Area for Improvement</u> The force should strengthen its approach to conducting PACE reviews of detention by:</p> <ul style="list-style-type: none"> <li>ensuring that it meets the requirements of section 107 of PACE, so that all acting inspectors are appropriately authorised to perform the role and that this is clearly recorded on the custody record</li> <li>conducting rigorous reviews for detainees held in the custody suite on behalf of others forces, so that investigations are carried out promptly and that these detainees spend no longer than necessary in custody</li> <li>providing accurate and detailed entries on the custody detention log, reflecting the content of the review carried out and ensuring that all detainees are told the outcome of any review conducted while they were sleeping, as required by paragraph 15.7 of PACE code C.</li> </ul>	AMBER	December 2019 to align with the HMICFRS return visit	<p><u>Requirements of section 107 of PACE – authorisation of acting / temporary inspectors</u> Uniform Policing Directorate have determined that processes for authorisations being given are:</p> <p>a) planned /long term authorisations given in advance given and recorded at UPD Local Resource Planning meeting</p> <p>b) for unplanned ad hoc duties. Authority for acting up to Duty / PACE Insp on an ad hoc basis within UPD is to be given via on-call UPD Supt and recorded in day-book.</p> <p>Acting and temporary duties SOP have been revised.</p> <p>The results of dip samples will confirm if practice is embedded – Quarter 2 pending.</p> <p><u>Reviews for detainees held in the custody suite on behalf of others forces</u> Statement of Expectations for Custody sergeants being reviewed. This will include a requirement to escalate those cases to Duty Insp where an officer considers are not being progressed expeditiously with particular reference to ‘other force’ Detainee Persons. Statement of Expectations for Duty Insp also being reviewed, updated and reissued to include this requirement.</p> <p><u>Accurate and detailed entries on the custody detention log</u> Included with the dip sample process</p>
13	<p><u>Area for Improvement</u> Staff should conduct and record standardised daily cell checks</p>	AMBER	December 2019 to align with the	The format of the template is being reviewed to ensure it addresses Detained Persons safety and security with qualitative actions.



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Recommendations & Areas for Improvement		Status	Due Date	Comment
			HMICFRS return visit	
14	<u>Area for Improvement</u> The force should ensure that all custody staff take part in an annual fire drill	AMBER	December 2019 to align with the HMICFRS return visit	Fire Evacuation Exercise Record Document will now record specific names of those involved in any live or planned exercise rather than just Group on duty. Custody Inspector has consulted with CoL Emergency Planning Officer, to devise and facilitate a table-top which took place in September 2019. A live exercise is being planned for 2020. This will be in addition to any Facilities Management planned exercises and other unplanned incidents that take place in year.
15	<u>Area for Improvement</u> The governance of the use of force in custody should be improved and provide assurance that when force is used it is safe and proportionate to the risk posed. In particular: <ul style="list-style-type: none"> <li>The force should collate accurate data concerning the use of force and ensure that all incidents are adequately recorded on custody records.</li> <li>All staff involved in incidents in which force is used should complete individual use of force forms.</li> <li>Incidents involving the use of force should be quality assured, including cross-referencing with closed-circuit television.</li> </ul>	AMBER	December 2019 to align with the HMICFRS return visit	Work has been conducted to develop a reconciliation process between the recording of Use of Force (UoF) from the PRONTO system [mobile devices] where UoF forms are recorded and held and the application of UoF as detailed in Custody records. Reports have commenced and are being provided on a 2 weekly basis. The reconciliation process has resulted in a compliance rate of 90%. Use of Force is now part of the Dip Sampling process within custody management and includes cross reference with CCTV records. Use of Force is reported to the Custody User Group and to the Police Authority Board.
16	<u>Area for Improvement</u> Detainee care should be improved. In particular, detainees should: be able to access fresh air and exercise in a suitable facility; be routinely provided with toilet paper; and be provided with replacement footwear when theirs is removed.	RED	December 2019 to align with the HMICFRS return visit	Investigations into requirements of providing a secure exercise area in the courtyard of Bishopsgate have been costed. The available options would still result in compromises for the dignity and respect of Detained Persons in that the area is overlooked by surrounding buildings. The accommodation is not suitable. Additionally, funding for this has not been built into the budget.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
				<p>There are no other mitigations available in the current accommodation but this will be a consideration in the specification for the build of the new Police/ Courts building.</p> <p>Reminders have been issued and will be raised again at the next series of rolling CPD sessions to embed.</p> <p>Dip sampling of initial Risk Assessment records to ensure actions taken in respect of risks identified are adequately recorded.</p> <p>All Detained Persons to be encouraged to wear footwear provided when they are moving around suite outside of cell.</p>
17	<p><u>Area for Improvement</u></p> <p>The force should ensure that it consistently identifies when an appropriate adult is needed for a vulnerable adult, and that one is subsequently secured without undue delay.</p>	AMBER	December 2019 to align with the HMICFRS return visit	<p>Contract for Appropriate Adults has been reviewed (in conjunction with CoL). A requirement to meet needs of Vulnerable Adults as well as children has been included to formalise requirements and service expectations. Specific KPIs have been incorporated into new contract. Specifications were agreed and were due commence in July 19, however, due to slippage they have not yet been implemented. The force is developing reports to monitor performance</p> <p>A revised dip sample template will seek to confirm the necessary improvements are embedded.</p>
18	<p><u>Area for Improvement</u></p> <p>Joint performance monitoring meetings should routinely analyse evidence about all aspects of staffing (vacancies, contingencies, training and supervision) and focus performance data to obtain assurance about detainee outcomes rather than simply considering health care practitioner activity.</p>	AMBER	December 2019 to align with the HMICFRS return visit	<p>Data extract work in being undertaken to support performance monitoring.</p> <p>Reminders have been sent to the provider requesting production of data, which remains outstanding.</p> <p>The provider now provides a rota detailing when Health Care Practitioners are available at Bishopsgate and when on call.</p> <p>Monthly provider/force meetings for remainder of year have been scheduled.</p>

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Recommendations & Areas for Improvement		Status	Due Date	Comment
19	<u>Area for Improvement</u> The provision of the planned embedded seven-day pilot scheme should be introduced as soon as practically possible.	AMBER	December 2019 to align with the HMICFRS return visit	This pilot is being led by Liaison and Diversion Team and delivery is under their control and direction. They are currently at the recruitment phase. It is anticipated that all staff will be in place by end of year. There will be a 7 day service but this will not be fully embedded within City due to activity levels. Staff will be available but based at Bethnal Green or Stoke Newington but will be available for initial telephone triage if necessary. The force has supplied an office for their use. Liaison meetings are held where updates are provided as regards delivery of their project and an anticipated schedule for implementation will be sought.
20	<u>Area for Improvement</u> The recording of release arrangements, to ensure that detainees are released safely, should be more detailed.	AMBER	December 2019 to align with the HMICFRS return visit	This is included in CPD sessions for Custody Officers. Review of travel assistance offered is to be conducted - petty cash vs travel warrant vs informal arrangements with TfL to support unfunded travel vs use of police vehicles. Guidance to be provided as to suitability of nature of arrangements in line with risks identified for individual (providing cash to drug addict and not using for agreed purpose) The new dip sampling template examines this area.
21	<u>Area for Improvement</u> Unnecessary documentation should not be added to person escort records, and any medical examination notes that need to accompany the detainee should be placed in a sealed envelope marked 'confidential'.	NEW GREEN	December 2019 to align with the HMICFRS return visit	A reminder has been sent to all officers. Dip sampling process monitors the following for assurance.
22	<u>Area for Improvement</u> Detainees should be moved to escort vehicles in a way which protects their dignity and privacy.	AMBER	December 2019 to align with the HMICFRS return visit	The Uniform Policing Directorate Head has directed that drivers of vans / cars delivering to or conveying prisoners from Bishopsgate must reverse to the station doors. This will reduce the risk of indignity as highlighted by the inspection, but also maximise officer safety and minimise risk of prisoner escape and any physical risk to prisoners.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
				The Custody Manager is drafting a Guidance Document for publication to support.

## Policing and Mental Health - Picking Up the Pieces

A national joint report by HMI-CFRS

Published November 2018

This report makes 3 recommendations for the police – 1 complete, 2 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<p><u>Recommendation</u></p> <p>By December 2019, forces should develop a better understanding of their mental health data, and the nature and scale of their demand. All forces should carry out a 24-hour snapshot exercise, using the new national definition of mental ill-health in Recommendation 1. This would help them see where their mental health demand is concentrated and identify any gaps in their data. The NPCC mental health lead should set out how the data was collected during the Welsh forces' snapshot exercise.</p> <p>This exercise will help forces understand the strain on the service by assessing the combination of demand and workload. This will then help forces when establishing and reporting mental health demand in their force management statements (FMSs).</p>	AMBER	December 2019	On the 7 <sup>th</sup> August 2019 the NPCC lead for Mental Health and Policing wrote to Chief Constables confirming that a national mental health 24 hour demand exercise was scheduled for 8 <sup>th</sup> October 2019. The force confirmed its willingness to participate, however the exercise has been postponed – the force will be seeking direction from the NPCC lead.

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Recommendations & Areas for Improvement		Status	Due Date	Comment
3	<p><u>Recommendation</u> By August 2019, all forces should review their existing partnership mental health triage services to assess their effectiveness, and the environment they are operating in. This will help them make decisions about sustainable future services with partners to make sure mental health care needs are being met. If forces find any deficiencies in their triage services, they should take steps to address them as soon as reasonably practicable. The College of Policing has agreed to devise some practice guidelines to help forces benchmark their triage activity. We will inspect on progress in this area as part of our integrated PEEL assessments inspection framework.</p>	WHITE	August 2019	Practice guidelines from the College of Policing to help forces benchmark their triage activity are pending. During the hot debrief for integrated PEEL inspection November 2018, feedback was positive in this area.
4	<p><u>Recommendation</u> By August 2019, all forces should review their mental health training programmes, using the College of Policing learning standards, to establish whether they are giving their officers the right tools to understand and respond to people with mental health problems. If forces find any deficiencies in their training programmes, they should take steps to address them as soon as reasonably practicable. Where forces invite outside organisations to train staff, they must make sure its content and quality are checked against College of Policing APP.</p>	NEW GREEN	August 2019	<p>August 2019 saw the completed delivery of Vulnerability training to the force, this was the College of Policing package which included elements on mental health. Following this, a review of the package was undertaken The main failing of the College of Policing package was that it failed to adequately cover local policies and procedures. As such, the new piece helps equip a first responder with what they need to deal with mental health and other issues under the heading of 'vulnerability'. The training also covers the new definition of a 'mental health related incident'. The role of out of this started at the end of August 2019, initially to frontline with plans for Priority 2 thereafter.</p>

## 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 5 of these are complete, 2 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
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 consistently applied, and that forces have adequate systems in place to make sure that this is done.</p>	NEW RED	<p>October 2018</p> <p>Now January 2020</p>	<p>The Head of Public Protection produced a new role and responsibilities [Crime Screening, Allocation and Finalisation Force Policy &amp; Standard Operating Procedure] ahead of the implementation of the new Force Resolution Centre to ensure appropriate processes are embedded, which included flagging. The force resolution centre went live 1<sup>st</sup> April 2019 and the deadline for this action is extended to January 2020 to ensure that compliance with the guidance is bedded in. The Performance Information Unit has confirmed that this flag is used to extract data from forces systems [Niche] and used within returns to the Home Office.</p>
8	<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</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 are reviewing their guidance and this is out for consultation – closed 5/11/2019.</p> <p>There is currently no date for formal publication.</p>

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Recommendations & Areas for Improvement		Status	Due Date	Comment
	monitored by force governance processes, including external scrutiny.			

## 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 – all complete.

Recommendations & Areas for Improvement		Status	Due Date	Comment
4	<b>Recommendation</b> 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.	NEW GREEN	No deadline specified within the report	The force has conducted an audit which has established a baseline of the number of youth conditional cautions and shortcoming arising from their issue. Numbers are low: 8 youth cautions and 3 youth conditional cautions in the year 2017/2018.  A new SOP has been published which addresses recommendations. Delivery of the caution will be by the Custody Manager to ensure consistency of delivery.
5	<b>Recommendation</b> 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.	NEW GREEN	March 2019 deadline set	
6	<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.	NEW GREEN	Now July 2019	

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Recommendations & Areas for Improvement		Status	Due Date	Comment
10	<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.	NEW GREEN		Compliance with the SOP will be undertaken within Business as Usual.
11	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.	NEW GREEN	No deadline specified within the report  August 2019 deadline set	The following SOPs have been reviewed, amended and published: Custody Juvenile Detainees SOP Custody – Fingerprints and non-intimate samples within a Custody Suite SOP

## 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
3	<b>Recommendation</b> 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.	WHITE	September 2018 And January 2019	Details of the peer review approach have not been released by the College of Policing at this time. Local peer review and opportunities to share best practice are being developed through the regional Vulnerability Steering Group chaired at commander level by the MPS. BTP are in attendance. The force submitted its Vulnerability Action Plan to the NPCC lead (Norfolk) Although broadly positive, feedback was received that we needed to



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Recommendations & Areas for Improvement		Status	Due Date	Comment
	The infrastructure to support peer reviews should be in place by September 2018 with the first reviews taking place by January 2019.			improve our strategic training with partners. Supt UPD Ops is negotiating attendance for CoLP and relevant COL leads to attend the highly recommended MPS-designed Hydra exercise called the Strategic Partner Agency Safeguarding Exercise (SPASE) designed for senior leaders in policing, health, education, children and adult services.

## 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 and are completed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
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>NEW GREEN</b>	No deadline set by HMICFRS  A deadline of April 2019 has been set  New deadline set July 2019	The Head of Public Protection has sought confirmation from criminal justice partners as to what programmes they access for convicted offenders. The force has engaged with the MPS Stalking Threat Assessment Centre which is leading a multi-agency team to develop perpetrator programmes. Partners include probation and mental health. The Acting Head of PPU has engaged with this team, resulting in the force having access to these programmes.