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 to be progressed

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
1	Recommendation 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 cyberdependent crime. In doing so they should consider: • the creation of a national police cyber-dependent crime network; • the remit of any such network;	AMBER	November 2020	A draft action plan is currently being developed.

Reco	mmendations & Areas for Improvement	Status	Due Date
	 how the network engages with other law enforcement agencies; and the tasking and co-ordinating responsibilities that will be required for the network to be effective. 		
2	Areas for improvement 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	Areas for improvement 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	Areas for improvement 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: • the minimum standards for investigation; • the role of regional cyber crime co-ordinators in the recording, management, and review of cyber crime investigations; and • the use of the weekly list provided by the National Fraud Intelligence Bureau to comply with the performance indicators.	AMBER	To be set
5	Areas for improvement The National Police Chiefs' Council Coordinator for Economic Crime should review the role the National Economic Crime	AMBER	To be set

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.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
4a	Recommendation By April 2020, all forces that haven't yet done so should: • record corruption using the national corruption categories; • produce a comprehensive annual counter-corruption strategic threat assessment, in line with the authorised professional practice; and • establish regular links between their counter-corruption units and those agencies and organisations who support vulnerable people. 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	This area is currently being reviewed by the new D/Supt PSD. An action plan is in development. The current strategy is being reviewed and considered as a forward facing document for staff

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
4b	Recommendation 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	As above
5	Recommendation 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 recommendation 1 of which is for the force and being progressed.

Reco	ommendations & Areas for Improvement	Status	Due Date	Comment
8	Recommendation 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: • the maintenance of a skills, competencies and career-history database on eligible candidates;	AMBER	July 2020	This action is 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.

Recommendations & Areas for Improvement	Status	Due Date	Comment
 the maintenance of similar information about the current membership of chief officer teams; the creation of lists of candidates who fit specific vacancies; an executive search function to advise forces on candidates who would best complement their existing teams; and a career support facility to advise candidates on roles and other development opportunities that would help meet their career aspirations. 			Organisational Development are exploring options for collecting and maintaining this data – they are also maintaining contact with the College of Policing.

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 6 areas for improvement for the Police. 4 are for the force, 3 complete and 1 to be progressed.

Reco	ommendations & Areas for Improvement	Status	Due Date	Comment
3	Recommendation 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.	NEW GREEN	February 2020	The Stalking and Harassment policy has been reviewed. It makes reference to breaches of orders being a criminal offence. The Force Resolution Centre ensures that offences are recorded as crimes in addition to breaches; where appropriate the volume of incidents is reflected. In addition the force is acting on the Home Office Counting Rule update that states that domestic breaches of orders automatically have additional crimes raised as stalking offences.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
8	Area for Improvement 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.	NEW RED but dependent upon NPCC lead	November 2019 Now February 2020	This action is for the NPCC lead for stalking and harassment and Chief Constables. A report will be produced for the February 2020 Force Crime Standards Board detailing how the force complies with stalking protocol.

Crime Data Integrity inspection 2019

A force report by HMICFRS, published August 2019

This report makes 6 areas for improvement for the force; 1 is complete, 5 to be progressed.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
1	Area for Improvement 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	AMBER	February 2020	Crimes are now raised within Control from the CAD incident record, this went live 24 th June 2019. Timeliness of crime recording is monitored and reported to Crime Standards Board – an audit conducted in January 2020 found 97% classified with 24 hours. Numbers and timeliness of recording Modern Slavery and be reviewed – no under recordings has been identified. NCRS requires crime to be recorded within 24 hours, the force has improved its position to 83% from 75% at the time of inspection. This is expected to increase further as the force embeds a process

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
				which reconciles City crimes from force incidents records [CAD] and MPS crime system. Once this is demonstrated to be working, this AFI will be GREEN.
2	Area for Improvement The force should immediately improve officer and staff understanding of the correct use of the N100 classification	NEW GREEN	February 2020	N100 audits are being undertaken to ensure the appropriate numbers are being recorded. Next steps: Refresher has been delivered and includes reported incidents of rape [N100] ¹ .
3	Area for Improvement 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	Area for Improvement 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. An August 2019 audit found 97% of crime were cancelled correctly, but 72% of victims had been informed. Next steps: Further audits are scheduled to ensure compliance, the results of which will determine if this AFI can be classified as delivered.

¹ 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.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
5	Area for Improvement 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. Thereafter, the Performance and Information Unit will analyse the
6	Area for Improvement 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 recommendations are complete 3 in progress.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
8	Cause of concern	AMBER	January 2020	The forces operates a opt out process in referring victims to victim support – this is the preferred option by HMICFRS

Reco	ommendations & Areas for Improvement	Status	Due Date	Comment
	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. Recommendation Within six months, chief constables should make sure that victim needs assessments are always completed.			The offering of victim needs assessments is part of the qualitative dip samples undertake by the Crime Directorate. The force has identified DSupt Little as Victim Champion – a role profile is in development and next steps being developed. Next steps: Dip samples will continue to be monitored to drive improvements.
10	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 should, support services don't have ready access to police information, and witness care arrangements are sometimes provided separately. Recommendation 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.	AMBER	January 2020 Now March 2020	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. A significant number of these victims will be older people. 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. Next steps: Victims code of practice compliance and MG2 special measures submissions are to be examined to ensure appropriate standards are being achieved. The work of the victims champion may also contribute.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
17	Area for improvement 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.	AMBER	January 2020 However FMS submission is not due until May 2020	Next steps: An analysis of all crime types, banded by the age of victims has been undertaken. This will enable the force to track trend changes over time. This analysis shows that victims over 58 are 6% of the total number of victims. Demand for calls for service by age analysis has been explored. However the system does not facilitate the collection of this type of data. Findings will be incorporated into the FMS.

PEEL 2018/2019

A national report by HMICFRS, published May 2019

This report makes 11 areas for improvement for the force; 2 complete 9 to be progressed.

Rec	ommendations & Areas for Improvement	Status	Due Date	Comment
1	Area for Improvement The force should improve its use of its crime-recording and management system to better manage its case files and investigative processes.	NEW GREEN	No deadline set by HMICFRS	Since the time for the inspection a number of initiatives have commenced which contribute to identifying issues: • Gatekeeper – this position has been re-established to verify the completeness and quality of files before there submission to the

Reco	Recommendations & Areas for Improvement		Due Date	Comment
			December 2019 set to align with the next inspection	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 related 'file quality' and Niche [crime and intelligence] system issues. 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. • Weekly Offender Management Meeting – 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. • A review of discontinued investigations where the suspect has not been identified and the victim does not support the prosecution has taken place. This identified practises which are inflating [incorrectly] this statistic. Corrective action is being taken with the FRC and will be monitored.
2	Area for Improvement The force should implement a process to get feedback from vulnerable victims.	NEW RED	December 2019 set to align with	HMICFRS recognised in their report that the force has a process to collect feedback from domestic abuse victims and victims with mental

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
			the next inspection anticipated early 2020. New deadline March 2020	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] — a part time vacancy. The selected candidate failed their vetting and a new recruitment process was run. A second successful candidate is currently undergoing vetting.
3	Area for Improvement 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.	NEW RED	No deadline set by HMICFRS December 2019 set to align with the next inspection	 Tasks 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. Current Status Four out of six schools have signed up to Op Encompass. The remaining two will get a follow up call/ visit to make sure they have every opportunity to get involved at the outset. DS PPU will conduct follow up meetings and briefings with the schools to support the project. 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].

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
				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.
5	Area for Improvement 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.	AMBER	December 2019 set to align with the next inspection anticipated early 2020. Now March 2020 pending outcome of pear review	A peer review was conducted by the National County Lines Coordination Centre 20 th and 21 st November 2019 – the force received a favourable hot debrief and a report is anticipated January 2020 [pending] This report, once received will inform future actions/deadlines Awareness in force of how to recognise county line issues continues.
6	Area for Improvement The force needs to address the deficit it has identified in its medium-term financial plan.	AMBER	December 2019 set to align with the next inspection anticipated early 2020. Now March 2020	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. The MTFP and has been submitted to Performance and Resources Committee [15/11/2019] by Head of Police Authority Finance – this paper provides an update on the current position and the forecast overspend. Balanced positions are projected for 2020/2021.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
7	Area for Improvement The force should ensure that effective external scrutiny takes place in relation to its use of force.	AMBER	December 2019 set to align with the next inspection anticipated early 2020. Now March 2020	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.
8	Area for Improvement 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 Now March 2020	The first meeting of the group took place on the 4 th September 2019, but did not examine data. Next steps: Vetting of IASG members continues Training sessions are being organised. The next Scrutiny meeting is anticipated for March 2020.
9	Area for Improvement The force should extend its unconscious bias training to all its workforce.	AMBER	No deadline set by HMICFRS	A training package has already been developed, a timetable set commencing late November 2019

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
			December 2019 set to align with the next inspection Now March 2020	Completion of training by the workforce will be monitored and reported in force.
10	Area for Improvement 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 Now March 2020	These documents have been reviewed for 2018/2019 and will be reevaluated for 2019/2020.
11	Area for Improvement The force should ensure that its counter-corruption unit: • 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	AMBER	No deadline set by HMICFRS December 2019 set to align with	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 nd May 2019] which was agreed – uplift of 2 officers. 1 in place, and one officer still awaited. Start date early February 2019. Currently we have a Temp DI, recruitment process ongoing.

Recommendations & Areas for Improvement	Status	Due Date	Comment
 builds effective relationships with individuals and organisations that support and work with vulnerable people. 		the next inspection	
		Now March 2020	

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.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
1	Recommendation 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 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. The use made of the system by police forces should be monitored and evaluated to identify best practice.	RED	September 2019	A letter has been drafted to all forces addressing this action. However, a decision was taken at the Service Oversight Board on the 17 th December 2019, membership of which includes the contractor providing Know Fraud Service, not to send this letter out at this point in time owing to outstanding commercial issues.
2	Recommendation 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	AMBER	March 2020	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.

Reco	ommendations & Areas for Improvement	Status	Due Date	Comment
	efficiently report fraud outcomes to the National Fraud Intelligence Bureau.			Next Steps Reports to force will commence at the end of March 2020.
5	Recommendation 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, 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: • make clear the roles and responsibilities of police forces and regional organised crime units; • 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 • define how fraud intelligence will be developed, disseminated and put to effective use by police forces and the National Fraud Intelligence Bureau. The implementation arrangements for the strategy should include clear communication and review processes.	AMBER	March 2020	A Strategy has been developed; consultation has taken place with PCCs, NECC and other priority stakeholder. The final version of the strategy was signed off by Chief Council October 2019. Next steps: Governance for implementation is anticipated for March 2020.
9	Recommendation By 30 September 2019, chief constables should publish their force's policy for responding to and investigating allegations of	RED	September 2019 Now	The ECD Fraud team case acceptance Policy SOP has been reviewed and published internally. Next Steps:
	fraud (in relation to both calls for service and National Fraud Intelligence Bureau disseminations for enforcement).		February 2020	A narrative for the CoLP external website is to be prepared and published.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
10	Recommendation 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	The force sought to establish a Police National Fraud PROTECT network similar to the Police National Cyber PROTECT network operating at a national, regional, and local level. This was the basis of a funding bid to the Police Transformation Fund. This bid was unsuccessful and subsequently the force engaged with an external partner and identified an internal resource to provide an evaluation capability. These new plans are progressing and processes are expected to be in place by March 2020.
14	 Recommendation With immediate effect, the National Police Chiefs' Council Coordinator for Economic Crime should: carry out (and subsequently evaluate) a campaign to raise the public awareness of the existence and role of Action Fraud; and provide chief constables with a description of the role of Action Fraud for uploading to force websites. 	AMBER	March 2020	A description of the role of Action Fraud has been produced and sent to forces. A draft campaign strategy has been produced and shared with the Home Office who agreed with a multi-agency approach. This is the preferred approach. Funding of the campaign is cannot be funded by Action Fraud, Home Office are aware. The multi-agency approach is intended to share costs. Work not expected to start until March 2020.
16	Recommendation 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,	AMBER	September 2019	The role of Action Fraud has been published together with a standard of service and includes options open to victims for civil redress.

Reco	ommendations & Areas for Improvement	Status	Due Date	Comment
	promptly on reporting a fraud, victims are provided with explanations of: • the role of Action Fraud; • 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; • how to obtain an update on the progress of their case; • 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 • 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).		Now March 2020	Key performance indicators are also published on the Action Fraud website. Next steps Redesign the initial fulfilment letter provided to victims reporting to Action Fraud. The letter received will outline what happens following the receipt of a crime report and the potential outcomes e.g. review and dissemination, non-review. This will be supported by an illustrative diagram.
18	Area for Improvement Chief constables should ensure their forces improve the identification and mapping of organised crime groups in which the principal criminality is fraud.	NEW GREEN	March 2020	The force already identifies and maps organised crime groups. Identification and mapping are discussed at the force Serious and Organised Crime Board. The force Serious and Organised Crime Board reviews a dashboard at each meeting, this dashboard monitors mapped primary criminality – of which is a significant proportion A City and National Lead Force case acceptance policy has been produced and published internally.
19	Area for Improvement 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.	NEW GREEN	March 2020	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. The force has a Lifetime Offender Management Unit - its' supervisor provides Fraud SIOs/Lead investigator with an integrated offender

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
				management and lifetime offender management options - ancillary orders are being pursued as a result. LOM supervisor provides Fraud SIO/Lead investigator with an IOM/LOM options papers - ancillary orders are being pursued The Lifetime Offender Management manager now has a standing invitation to the Economic Crime Directorate Tasking meeting to
21	Area for Improvement Chief constables should ensure that their force complies with the Code of Practice for Victims of Crime when investigating fraud.	NEW GREEN	March 2020	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.
				The Economic Crime Victim Code of Practice has been reviewed – practises are compliant some ancillary information requires up date.

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 [complete] and 21 areas for improvement for the force of which 2 are complete the remainder are being progressed.

Recommendations & Areas for Improvement	Status	Due Date	Comment
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Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
2	Area for Improvement 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 Now extended to April 2020 to align with Transform	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 Group Inspectors. Duty planning allocate shifts to resilience officers to ensure they maintain their accreditation. A dedicated Custody staffing group has been established on a 3 month rolling basis sourced from Response Groups, alongside DDOs and Custody Goalers to improve both experience and skills and to better control cover and requirement for overtime. Work has been completed to reconcile skills records in TAS with Custody Training Tracker. This has delivered accurate availability of Custody skills report and facilitates more effective use of DMS for planning purposes. Custody management demand to be feed into Transform. Tasks to be progressed: Transform programme [Custody] – work is ongoing; Custody being considered within Investigation strand with proposals to develop alongside AoJ function in train. Detailed staffing structure model being prepared.
3	Area for Improvement 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	Van docking arrangements have been formalised. Associated requirements to be capture for the new custody facilities. New design guidelines published by Home Office have been fed into the Accommodation Team. There is potential to arrange a peer review of CoLP design plans of new Custody Suite being investigated with officer from National

Reco	Recommendations & Areas for Improvement		Due Date	Comment
			HMICFRS return visit	Lead team for police Build Custody Blocks once plans are close to finalisation.
			Now March 2020	Tasks to be progressed: Deep Clean and Maintenance works in Custody have been delayed due to operational activities – this work is to be rescheduled into new year – date still TBC.
				Adaptions (lowering of call bell in 9) and introduction of hatched 'no loitering area' in reception area are programmed to be delivered during Suite closure - rescheduled into new year. Opportunities and documentation necessary to secure funding for delivery of exercise facilities are being investigated.
4	Area for Improvement 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.	NEW GREEN	December 2019 to align with the HMICFRS return visit	A qualitative dip sample has been developed encompassing HMICFRS findings, best practice from APP/CoP and IOPC reports. It uses a tiered approach based on risk / impact and findings with template presented to CMG on 18.09.19 for sign off. New enhanced process introduced from 01.07.19 for Q2 onwards. An overview report of the dip sampling of Q1 process has been completed. Themes and learning points have been identified and have been supplied to the Custody L&D trainer to incorporate into refresher training and weekly CPD sessions held by Custody Management. Findings include insufficient recording keeping and failures to probe/follow up DP answers when completing Risk

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
				Assessments. Good practice records were also identified (for use in training) too. No safeguarding issues identified. Next steps End of Q2 reporting to ensure full process fully embedded. Results of Q2 dip sampling being finalised and collated. Reports for both individual officers from records sampled, incl both good and less good work, being produced alongside along-side themes report. Will be used by Supervisors, L&D and Custody Management team to drive CPD, service improvements and officer performance.
5	Area for Improvement 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 Now March 2020	Performance data has been defined, data has commenced but remains a work in progress – performance reports are evolving. Data that has been collated to date has enabled some challenge to the health care provider A risk register for custody has been complied but requires development.
6	Area for Improvement 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 report are being generated for use by Custody Management.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
			Now March 2020	Dip sampling results from quarter 2 are pending presentation to the Custody User Group [November 2019]. Next tasks Development of quarterly reporting underway but reconciliation issues have delayed output. Further refinement of reports in line with Group needs Performance reports for partner activities in line with contract requirements
7	Area for Improvement 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 the custody records meet the required standards.	AMBER	December 2019 to align with the HMICFRS return visit Now Feb 2020	A dip sample regime has been establish and reported against quarter 1, quarter 2 results are pending. Next steps Development of Show Me Good guides to support officers in completion of necessary documentation
8	Area for Improvement 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 Now March 2020	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. Reporting tool for H&S incidents being investigated to incorporate diversity information results to be included in Custody Manager's report to CMG

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
9	Area for Improvement 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 Now March 2020	Unfortunately planned Deep Clean and Maintenance works in Custody have been delayed due to operational activities now planned – this work is to be rescheduled into new year – date still TBC. A mitigation has been identified [laptops utilised in a private side room] and has been communicated to officers and included within CPD safeguarding and welfare responsibilities. Hatching 'no loitering' area in Reception to be marked up to minimise opportunity to view CCTV monitors, rescheduled for the New Year.
10	Area for Improvement The approach to managing some elements of risk should be improved. In particular: • Detainees who are intoxicated should be placed on observation levels that include rousals. • Detainees' clothing and footwear should only be removed based on an individual risk assessment. • All custody staff should be involved collectively in shift handovers.	AMBER	December 2019 to align with the HMICFRS return visit Now March 2020	Detainees who are intoxicated 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. Detainees' clothing and footwear 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.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
				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.
				Collective in shift handovers A new procedure for Custody handovers due to be implemented from 23rd September 2019. Guidance on requirements for each shift and role (including HCPs issued 19.09.19 provided alongside a Statement of Expectations for Custody Officers and DDOs At this time inclusive handover between ND and ET staff remains unresolved due to differing and non overlapping shift patterns.
11	Area for Improvement The force must consistently meet the requirements of PACE code C for the detention, treatment and questioning of suspects. In particular by: • 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) • 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) • 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).	NEW GREEN	December 2019 to align with the HMICFRS return visit Now March 2020	Rights and entitlement notice 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. Explain to detainees who are held 'incommunicado' the reasons for this. 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.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
				Monitoring of overarching dip sampling results from Q2 2019/2020 onwards will reveal trend analysis and compliance which can then be addressed accordingly [pending]. Ensure all custody staff provide translated documents 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. Result of future dip samples to identify if the required change has been embedded.
12	 Area for Improvement The force should strengthen its approach to conducting PACE reviews of detention by: 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 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 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 	AMBER	December 2019 to align with the HMICFRS return visit Now March 2020	Requirements of section 107 of PACE – authorisation of acting / temporary inspectors Uniform Policing Directorate have determined that processes for authorisations being given are: a) planned /long term authorisations given in advance given and recorded at UPD Local Resource Planning meeting 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. Acting and temporary duties SOP have been revised. The results of dip samples Qtr 2 results are being finalised and collated.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
	sleeping, as required by paragraph 15.7 of PACE code C.			Reviews for detainees held in the custody suite on behalf of others forces 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. Accurate and detailed entries on the custody detention log Included with the dip sample process
13	Area for Improvement Staff should conduct and record standardised daily cell checks	AMBER	December 2019 to align with the HMICFRS return visit Extended to February 2020	Format of template being discussed. Do not wish it to become a tick box process but to ensure it addresses DP safety and security with qualitative actions. Example format template is being sourced from other force and also via regional Custody forum.
14	Area for Improvement 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.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
			Extended to March 2020 (completio n of table top exercise for all groups	This will be in addition to any Facilities Management planned exercises and other unplanned incidents that take place in year.
15	Area for Improvement 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: • The force should collate accurate data concerning the use of force and ensure that all incidents are adequately recorded on custody records. • All staff involved in incidents in which force is used should complete individual use of force forms. • Incidents involving the use of force should be quality assured, including cross-referencing with closed-circuit television.	AMBER	December 2019 to align with the HMICFRS return visit	Remaining task to develop process for publication of Custody UoF data on public website which aligns with holistic force material. Latest PIU reports indicates 100% compliance NICHE/PRONTO UoF records for all new records now being achieved Results of Q2 dip sampling process being finalised and collated. Reports for individual officers from records sampled being produced, identifying both good and less good work. These will be used by L&D and supervisors to enable an improvement in performance. Decision taken at CMG on 14.11.9 to publish Custody UoF data alongside all Force data. Material to be prepared for publication Work has been conducted with PIU to develop a reconciliation process between PRONTO (where UoF forms are recorded and held) and application of UoF as detailed in Custody records. Reports have commenced and are being provided on a 2 weekly basis. These have revealed errors both for incorrect and inaccurate recording Since 03.06.19 since reconciliation commenced compliance has moved from 20 to 90 %

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
				UoF is now part of the Dip Sampling process within custody management section being a Tier 3 review (which includes cross reference with CCTV records). In July 7 out of 14 records sampled. Report presented to CMG on 16.09.19 re detailed UoF in Custody for period June-August 19.
16	Area for Improvement 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.	AMBER	December 2019 to align with the HMICFRS return visit Now March 2020	This issue has been escalated through governance mechanisms and raised with the Commissioner by Chief Officer Lead Commander Evans. The Commissioner has given his agreement for progression of provision of an exercise yard at Bishopsgate. Provision of funding within CoLP budget envelope to be ascertained. 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 DPs in that the area would be overlooked by surrounding buildings. Due to current financial circumstances the force has not been able to secure the necessary level of funding required and is unlikely to be able to do so for the current foreseeable future. There is no alternative mitigations available. Reminders have been issued and will be raised again at the next series of rolling CPD sessions to embed. Dip sampling of initial Risk Assessment records to ensure actions taken in respect of risks identified are adequately recorded.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
Recor	Area for Improvement 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.	Status	December 2019 to align with the HMICFRS return visit	Reminders have been issued that and will be raised again at the next series of rolling CPD sessions to embed. All Detained Persons to be encouraged to wear footwear provided when they are moving around suite outside of cell. This contract is 'owned' and driven by the CoL Children and Social Services Dept. 2 of collaborating Local Authorities have dropped out (Tower Hamlets and Hackney) and lead CoL officer has left so progress minimal. CoLP (Custody Manager) are liaising with Asst Director of Services (Chris Pelham) to push. In interim suggestion to secure a pool of available 'volunteers' from local community/businesses who can be called upon immediately to at least assist in immediate delivery of R&E to vulnerable persons if family/AA persons cannot be secured in a timely fashion being investigated. Contract for AAs 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
			2020	expectations. Specific KPIs have been incorporated into new contract. Specification has been agreed but due to slippage should now be commencing mid July 19. This has now slipped further - updates being chased.
				PIU are developing reports to monitor performance
				A revised dip sample template will seek to confirm the necessary improvements are embedded.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
18	Area for Improvement 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.	AMBER	December 2019 to align with the HMICFRS return visit Now March 2020	Data extract work in being undertaken within PIU to support performance monitoring. Reminders have been sent to G4S requesting production of data and for meetings as of recent months these have again not been taking place as arranged. G4S Operations Manager now provide a rota detailing when HCPs available at CP6 and when on call. Monthly meetings for remainder of year have been scheduled with G4S Operations Manager.
19	Area for Improvement 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 Now March 2020	This pilot is being led by Liaison and Diversion Team and delivery is under their control and direction. They are currently in the recruitment phase seeking to secure individuals to these posts. It is hoped 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. CoLP have supplied an office for L&D officers use. Liaison meetings are held where updates are provided as regards delivery of their project and an anticipated schedule for implementation will be sought. The force has supplied an office for their use.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
				Liaison meetings are held where updates are provided as regards delivery of their project and an anticipated schedule for implementation will be sought.
20	Area for Improvement 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 Now March 2020	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.
22	Area for Improvement 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 Now February 2020	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. 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 HMICFRS Published November 2018

This report makes 3 recommendations for the police; 2 are complete, 1 pending input from the College of Policing

Reco	ommendations & Areas for Improvement	Status	Due Date	Comment
2	Recommendation 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. 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).	NEW GREEN	December 2019	On the 7 th August 20190 the NPPC lead for Mental Health and Policing wrote to Chief Constables confirming that a national mental health 24 hour demand exercise is to take place on Tuesday 8 th October 2019. This was postponed until the 12 th November 2019 - this return has be made
3	Recommendation 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.	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.

Recommendations & Areas for Improvement	Status	Due Date	Comment
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.			

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.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
6	Cause of concern 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. Recommendation We recommend that, within three months, chief constables make sure that the Home Office cyber-enabled flag is	RED	October 2018 Now March 2020	The Head of Public Protection produced a new role and responsibilities [Crime Screening, Allocation and Finalisation Force Policy & 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 1st April 2019 and the deadline for this action is extended to January 2020 to ensure that compliance with the guidance is bedded in.

Reco	mmendations & Areas for Improvement	Status	Due Date	Comment
	consistently applied, and that forces have adequate systems in place to make sure that this is done.			The Performance Information Unit have confirmed that this flag is used to extract data from forces systems [Niche] and used within returns to the Home Office. Next Steps: HMICFRS inspected the Force Nov/Dec 2019 [Child Protection] during the hot debrief concerns were raised around flagging – the force needs to further assure that processes are being adhered to.
8	Recommendation 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. • 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 • We recommend that, following the review, any agreed minimum standard of response for forces should be monitored by force governance processes, including external scrutiny.	WHITE	January 2019	This action is for the NPCC lead for hate crime and College of Policing. The force complies with current guidance issued by the College of police Hate crime operation guidance 2014. The College of Policing are reviewing their guidance and this is out for consultation – closed 5/11/2019. There is currently no date for formal publication.

PEEL: Police Effectiveness 2017 – National

A national report by HMICFRS
Published March 2018
This report was published 22nd 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

Reco	ommendations & Areas for Improvement	Status	Due Date	Comment
3	Recommendation 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. The infrastructure to support peer reviews should be in place by September 2018 with the first reviews taking place by January 2019.	WHITE	September 2018 And January 2019	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 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. A review of the National Vulnerability Action Plan is due to be undertaken – the force has been invited to be part of the review team.