

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.

Counter-terrorism policing

An inspection of the police's contribution to the government's Prevent programme

A thematic report HMICFRS and HMI Probation

Published 9th March 2020

There are 8 recommendations of which 1 is for the force progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> By June 2020, the NPCC national Prevent lead and the College of Policing should develop a training and awareness package that encompasses continuous professional development for Prevent strategic leads in forces.	WHITE	June 2020	This action is for NPCC national Prevent lead and the College of Policing

Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<u>Recommendation</u> By June 2020, the College of Policing and the NPCC national lead for public protection and safeguarding should add vulnerability to radicalisation as the 14th core discipline of public protection.	WHITE	June 2020	This action is for College of Policing and the NPCC national lead for public protection and safeguarding
3	<u>Recommendation</u> With immediate effect, the NPCC national Prevent lead should make sure that all fixed intelligence management units have sufficient access to the Prevent case management tracker.	WHITE	No date set by HMICFRS	This action is for NPCC national Prevent lead
4	<u>Recommendation</u> With immediate effect, the NPCC national Prevent lead should create national guidance for the police service on applying Prevent to staff vulnerable to radicalisation or extremism, to identify a range of options, such as selection processes, welfare and vetting, including guidance on risk thresholds.	WHITE	No date set by HMICFRS	This action is for NPCC national Prevent lead
5	<u>Recommendation</u> By June 2020, the NPCC national Prevent lead should review the national business assurance process to assure compliance with NCTPHQ policy.	WHITE	June 2020	This action is for NPCC national Prevent lead
6	<u>Recommendation</u> By June 2020, the NPCC national Prevent lead and Office for Security and Counter-terrorism (OSCT) should develop performance measures that will help police forces assess their operational contributions to Prevent.	WHITE	June 2020	This action is for NPCC national Prevent lead and Office for Security and Counter Terrorism.
7	<u>Recommendation</u> With immediate effect, the NPCC national Prevent lead and each force Prevent lead should review the attendance of force representatives at Channel panels so that police are correctly represented by decision makers who can make a contribution to managing risk.	AMBER	No date set by HMICFRS Force deadline	This action is for the NPCC national Prevent lead and the force to progress. The NPCC lead has issued a number of actions for forces to progress in support of their actions.

Recommendations & Areas for Improvement		Status	Due Date	Comment
			September 2020	
8	<u>Recommendation</u> By June 2020, the NPCC national Prevent lead and OSCT should undertake a national review of counter-terrorism local profiles (CTLP), to include its governance, purpose, method of creation, structure and dissemination, and produce revised CTLP guidance.	WHITE	June 2020	This action is for NPCC national Prevent lead and Office for Security and Counter Terrorism.

Integrated Offender Management

Joint national thematic report HMICFRS and HMI Probation

Published 28th February 2020

There are 11 recommendations of which 4 are for the force, 3 are complete 1 to progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> The Ministry of Justice should, in collaboration with the Home Office: commission an independent, authoritative and structured evaluation of the cost and benefits of IOM, in terms of crime reduction; reduced frequency and/or seriousness of reoffending; and eventual desistance from crime. In doing this, they should identify which cohorts of offenders benefit most from the IOM approach	WHITE	HMICFRS have not set a date	This action is for the Ministry of Justice

Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<u>Recommendation</u> The Ministry of Justice should, in collaboration with the Home Office: refresh the joint IOM strategy and provide clear leadership and support for the delivery of IOM and sharing of best practice. The strategy should be clear about who should provide leadership and governance for IOM within local areas.	WHITE	HMICFRS have not set a date	This action is for the Ministry of Justice
3	<u>Recommendation</u> The Home Office should, in collaboration with the Ministry of Justice: provide support to local areas on the use of IDIOM, or an equivalent suitable alternative, to ensure that there is one performance framework that can help measure the impact of IOM on the cost of crime and the rehabilitation of service users.	WHITE	HMICFRS have not set a date	This action is for the Home Office in collaboration with the Ministry of Justice
4	<u>Recommendation</u> Her Majesty's Prison and Probation Service should: provide information on service user profiles, characteristics and needs to local police and probation services, to support the development of IOM and commissioning of services at a local level.	WHITE	HMICFRS have not set a date	This action is for the Her Majesty's Prison and Probation Service
5	<u>Recommendation</u> The Probation Reform Programme should: ensure that there is a workstream dedicated to IOM development and that probation delivery partners at a local level provide interventions that address the needs of individuals subject to IOM.	WHITE	HMICFRS have not set a date	This action is for the Probation Reform Programme
6	<u>Recommendation</u> Police and Crime Commissioners should: assure themselves that all relevant partners and services are involved in the delivery of IOM, as a major contribution to reducing reoffending and community safety.	WHITE	HMICFRS have not set a date	This action is for Police Authority Board.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>7</p> <p><u>Recommendation</u> Chief Constables, National Probation Service Divisional Directors and Community Rehabilitation Company Chief Executive Officers should: define their IOM operating model and produce practice guidance that sets out clearly what is required by each agency at every stage of the IOM supervision process.</p>	<p>AMBER</p>	<p>November 2020</p>	<p>Offenders managed within an Integrated Offender management [IOM] approach are done so within the force area in which they are resident. There are no resident offenders in the City that qualify for IOM against the national criteria.</p> <p>The City of London Police has joint working relationships with forces that own nominals that offend in the City.</p> <p>Nominals are reviewed monthly at cross boarder IOM meetings. The force has an IOM team which undertakes a range of functions including, but not restricted to:</p> <ul style="list-style-type: none"> • Monitoring local crime to identify IOM nominals • Liaison with owning IOM units in other forces to seek assistance • Working with owning IOM units to impose restrictive measures on IOM offenders • Develop and maintain relationships with national IOM law enforcements partners. <p>A force standard operating procedure has been produced, publication on the force intranet pending.</p> <p>The force is aware that the NPCC lead for Integrated Offender Management is considering changes to this area of work – no proposals have been made nor timelines announced.</p> <p><u>Next steps</u> Standard operating procedure to be published on the force intranet Timelines for any NPCC lead changes to IOM are to be established.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>8</p> <p><u>Recommendation</u> Chief Constables, National Probation Service Divisional Directors and Community Rehabilitation Company Chief Executive Officers should: improve the quality and accuracy of recording in IOM cases, in particular, the activity relating to public protection</p>	<p>NEW GREEN</p>	<p>November 2020</p>	<p>Records relating to integrated offender management [IOM] nominals are primarily maintained by the forces that own them. The City does not have any resident integrated offender management nominals and therefore does not hold primary records. Subject matter expertise is available to the force IOM unit from the force Public Protection Unit i.e. sexual or violent offenders if required.</p> <p>The force updates its crime and intelligence systems with any integrated offender management nominals coming to notice. Relevant officers [Communities/patrol] are briefed on a daily basis on IOM nominals coming to notice.</p> <p>Community policing deliver local awareness of IOM nominals as a preventative measure.</p> <p>Every IOM coming to notice is screened against relevant outstanding crime type and methods used to ensure suspected culpability can be assessed.</p> <p>IOM nominals are immediately screened for criminal history to determine if proportionate restriction orders can be imposed to prevent further offending.</p> <p>All IOM nominals are subject to non-crime interviews to ascertain any rehabilitation / prevention opportunities for their support. All information is relayed back to the owning force.</p>
<p>9</p> <p><u>Recommendation</u> Chief Constables, National Probation Service Divisional Directors and Community Rehabilitation Company Chief Executive Officers should: analyse training needs and ensure that all staff receive sufficient training to enable them to fulfil</p>	<p>NEW GREEN</p>	<p>November 2020</p>	<p>Sexual offenders and Violent offenders are managed by the Public Protection Unit whose officers have received and maintain their specialist training.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
	their duties. Training in public protection, safeguarding children and working with vulnerable adults should be prioritised			<p>City of London officers have received vulnerability training and further inputs for safeguarding children 'voice of the child' are planned but at this time not scheduled.</p> <p>Training requirements of the force integrated Offender management unit are periodically reviewed by their line management – no specific gaps have been identified.</p>
10	<p><u>Recommendation</u> Chief Constables, National Probation Service Divisional Directors and Community Rehabilitation Company Chief Executive Officers should: ensure that service users are kept informed, as much as possible, about the benefits of inclusion in IOM, the support available and the monitoring and information-sharing ramifications of IOM supervision.</p>	NEW GREEN	November 2020	<p>The force is represented at National working groups chaired by the NPCC lead for Integrated Offender Management [IOM]. Cross boarder and local (London) IOM meetings are attended by the force in order to ensure the force IOM unit are appraised of current / future working practices and trends.</p> <p>Information and intelligence is shared by the force IOM unit with the owning force of any nominal coming to notice with the City.</p> <p>The IOM unit integrates fully across the force providing relevant specialist advice.</p>
11	<p><u>Recommendation</u> The National Police Chiefs Council lead for IOM and the National Probation Service IOM Strategic lead should: establish a joint national oversight group to drive forward improvements to IOM and make sure that progress is sustained.</p>	WHITE	HMICFRS have not set a date	This action is for the NPCC lead for IOM and the National Probation Service IOM Strategic lead.

National Child Protection Inspections: 2019

National thematic report HMICFRS

Published 27th February 2020

The report makes 6 recommendations of which 3 are for forces. The force is progressing 2 actions, 1 is closed since the force has been inspected by the National Child Protection Inspection Team – published report pending.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><u>Recommendation</u> We recommend that the Home Office jointly with other government departments considers the development of a new national early help and prevention strategy to more effectively address the root causes of harm for vulnerable children. The purpose of such a strategy should be to ensure agencies work together as part of a coherent whole system approach to recognise and respond to the earliest indicators of risk and vulnerability in order to prevent escalating and cumulative trauma.</p>	WHITE	No date set by HMICFRS	This action is for the Home Office and other government departments
2	<p><u>Recommendation</u> We recommend that the Ministry of Justice and Department for Education undertake a review of the current provision of intermediaries and the extent to which social workers undertake interviews of children with the police.</p>	WHITE	No date set by HMICFRS	This action is for the Ministry of Justice and Department of Education
3	<p><u>Recommendation</u> We recommend that chief constables take steps to reduce the unnecessary criminalisation of children. Such steps could include (but don't need to be limited to) considering fully a child's circumstances when making decisions; more effective use of legislation to discontinue prosecutions not in the public (or child's) interest; the development of more effective non-criminal justice pathways for vulnerable children who commit lower level crimes.</p>	AMBER	No date set by HMICFRS A deadline of September 2020 subject to the outcomes of the review to	<p>Crime Directorate has identified a resource to conduct a review of the outcomes of arrested children, identify any non-criminal pathways that are being utilised / that are available and how any repeat child offenders are being dealt with.</p> <p>The force Crime Standards Board will consider the review report, any accepted recommendations will be monitored by this board.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
			be undertaken	Next step: Terms of reference for the review to be agreed and the work commence.
4	<u>Recommendation</u> We recommend that the Home Office and Department for Education undertakes a review of the unnecessary detention of children. This review should include an assessment of the effectiveness of the 2017 National Custody Concordat, the provision of alternative accommodation, the provision of appropriate adult services and the use of bail by the police.	WHITE	No date set by HMICFRS	This action is for the Home Office and Department of Education
5	<u>Recommendation</u> We recommend that chief constables should review performance management and quality assurance approaches to ensure that assessments of the nature and quality of decision making are routinely made. The purpose of this would be to reinforce the understanding that compliance with policy or process is only one part of effective practice.	AMBER	No date set by HMICFRS A deadline of September 2020 subject to the outcomes of the review to be undertaken	Volume of juveniles in custody is low and dip sampling rates of their records are high and can be up to 100% of monthly throughput. These custody records are assessed both for PACE and voice of the child. Superintendent visits are performed to assess the welfare/experiences of juveniles in custody – enabling first-hand experience of be gained of the juveniles circumstances. The results of dip samples, together with quarterly figures are reviewed at Custody Management Group. Analysis includes age, gender, ethnicity, offence type and detention time. The review which Crime Directorate will undertake [Recommendation 3 above] will also consider the performance management and quality assurance approaches through the investigative process.

Recommendations & Areas for Improvement		Status	Due Date	Comment
6	<u>Recommendation</u> We recommend that chief constables on those forces not yet inspected by the NCPI or JTAI take steps to identify and implement good practice and the learning highlighted from these programmes. This may include engaging with those forces who have been inspected, direct contact with the HMICFRS child protection lead or participating in a regional or national learning event.	CLOSED	No date set by HMICFRS	The force has been inspected publication of the HMICFRS report is currently pending. An action plan will be produced in response to the published report when available.

Evidence led domestic abuse prosecutions

National Joint report HMCPSi and HMICFRS

Published January 2020

This report makes 8 recommendation, 6 for the force of which 3 are complete and 3 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendations</u> Police supervisors and Crown Prosecution Service legal managers should maximise opportunities to share examples of good work and successful outcomes with their teams.	NEW GREEN	July 2020	The force Administration of Justice unit attends joint meetings with the Crown Prosecution Service [CPS] providing opportunities to share good practises / outcomes. The Crown Prosecution Service also attend the force Disclosure Working Group. The Public Protection Unit attends the Local Criminal Joint Domestic Abuse Delivery Board providing learning opportunities.

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>The CPS conduct a random analysis of force Domestic Abuse cases to ensure they were charged or cautioned correctly; results are shared with the force.</p> <p>The force Public Protection Unit has contributed to the update of the Domestic Abuse Court Protocol with CPS and HM Courts and Tribunals Service.</p>
<p>2</p> <p><u>Recommendations</u> As well as the Crown Prosecution Service's bespoke e-learning, which all Area prosecutors have to complete, the police and Crown Prosecution Service should ensure that refresher training in domestic abuse, and particularly evidence led cases, is available to staff as appropriate.</p>	AMBER	<p>No deadline set by HMICFRS</p> <p>July 2020 by the force</p>	<p>The force Learning and Development department is assessing the content and length of any input required for frontline officers and staff. Scheduling of training remains under review – probationer training has been prioritised.</p>
<p>3</p> <p><u>Recommendation</u> The police should review training plans in order to ensure that all appropriate staff, both frontline officers and investigators, are trained how to handle domestic abuse cases.</p>	AMBER	<p>No deadline set by HMICFRS</p> <p>July 2020 by the force</p>	<p>Additionally, the force is conducting a virtual 'Focus on Domestic Abuse' session to refresh officer knowledge, skills and understanding.</p>
<p>4</p> <p><u>Recommendation</u> Police forces with domestic abuse champions should raise awareness of the role and seek to utilise them to maximum effect.</p>	NEW GREEN	<p>No deadline set by HMICFRS</p> <p>July 2020</p>	<p>This role is already widely recognised in force as the DI in the dedicated Public Protection Unit [PPU]. PPU oversee all domestic abuse investigations against the context of a small geographic area and a comparatively low volume of domestic abuse incidents.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
5	<p><u>Recommendation</u> Police forces should ensure that training, messaging and guidance is clear that evidence led cases should benefit from the same quality of investigation, early gathering of evidence and supervisory oversight as other domestic abuse cases, particularly in cases where the victim does not support police action. Domestic abuse champions should reinforce this message.</p>	AMBER	<p>No deadline set by HMICFRS</p> <p>Set to July 2020</p>	<p>All domestic abuse cases are progressed by the Public Protection Unit, cases are progressed on an evidence led basis and supervisory oversight processes are in place.</p> <p>The Learning and Development department are producing a virtual 'Focus on' domestic abuse session for the wider force as a refreshed to skills, knowledge and understanding. Date for release pending.</p>
6	<p><u>Recommendation</u> Police should ensure that investigations and decisions to take no further action in domestic abuse cases receive the same robustness of supervisory oversight as other domestic abuse cases.</p>	NEW GREEN	<p>No deadline set by HMICFRS</p> <p>Suggest July 2020</p>	<p>All domestic abuse investigations are overseen by the force Public Protection Unit. Crimes which result in no further action follow the same supervisory oversight and procedures as crimes which progress.</p>
7	<p><u>Recommendation</u> Prosecutors should ensure that in all domestic abuse cases, they set out clearly at the charging stage whether an evidence led prosecution is viable and, if so, define an effective prosecution strategy.</p>	WHITE	<p>No deadline set by HMICFRS</p>	<p>This action is for the CPS.</p>
8	<p><u>Recommendation</u> At review stage, prosecutors should, in all appropriate domestic abuse cases, clearly outline a strategy for proceeding with an evidence led prosecution.</p>	WHITE	<p>No deadline set by HMICFRS</p>	<p>This action is for the CPS.</p>

Cyber: Keep the light on

A national report by HMICFRS

Published October 2019

This report makes 5 recommendations, 4 are for the force [or in part]. 2 are complete, 2 are in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><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:</p> <ul style="list-style-type: none"> • the creation of a national police cyber-dependent crime network; • the remit of any such network; • 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. 	CLOSED	November 2020	<p>This action is not for the force to deliver, however, the Cyber National Programme are waiting to understand the government's direction.</p> <p>Overall responsibility of the Cyber National Programme is NPCC lead Chief Constable Goodman.</p>
2	<p><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.</p>	AMBER	November 2020	<p>Specials with specialised skills are utilised in other areas of the force. The force is open to specials and volunteers with cyber skills undertaking duties and has engaged with the force lead for specials and volunteers to identify potential candidates-numbers and deployments are being ascertained.</p> <p>Volunteers are already utilised within the Cyber Protect UK Network, which consists of all forces and Regional Organised Crime Units.</p>
3	<p><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</p>	NEW GREEN	No date set by HMICFRS	<p>At the time of publication there were 6,500 quarantined reports. As at 21st February 2020 this had reduced to 458.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
	the Know Fraud system. Furthermore, the force should also identify its proposals to prevent a re-occurrence.		June 2020 set by force	There is a requirement for the quarantine of suspect Know Fraud reports which may harbour a malicious attack on the system. However, levels of quarantines reports are managed, monitored and levels plateaued.
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"> • [1]the minimum standards for investigation; • [2]the role of regional cyber-crime co-ordinators in the recording, management, and review of cyber-crime investigations; and • [3] The use of the weekly list provided by the National Fraud Intelligence Bureau to comply with the performance indicators. 	WHITE	No deadline set by HMICFRS	Bullets 1 and 2 are the remit of the NPCC lead and are not for the force.
		AMBER	No deadline set by HMICFRS Force deadline July 2020	Bullet 3 – the use of the weekly lists Revised guidance has been produced which is sent together with the weekly lists provided by the National Fraud Intelligence Bureau. This guidance is specific in the purpose for which the list is to be used. This guidance will be reviewed upon any future standards set by the NPCC lead for Cyber Crime. The performance indicators referred to within the recommendations were set by the National Board Force Specialist Cyber Capability Project Board. This action remains at AMBER whilst enquires are undertaken as to the status of bullet points 1 and 2 and any decisions yet to be taken by the national board which could impact this bullet point 3.
5	<u>Areas for improvement</u> The National Police Chiefs' Council Coordinator for Economic Crime should review the role the National Economic Crime	NEW GREEN	No date set by HMICFRS	An independent review was commissioned and a report received. The report concludes:

Recommendations & Areas for Improvement	Status	Due Date	Comment
Victim Care Units in providing advice and support to victims of cyber-dependent crime.		June 2020 set by force	<p>“Given that there are no backlogs of cyber dependent cases in the National Economic Crime Victim Care Unit [NECVCU], a third of all cases will be dealt with by forces and a range of advice to prevent re-victimisation is available through call backs, e-mails, on-line resources and the National Economic Crime Centre [NECC] where necessary, I believe that cyber-dependent victims are adequately served. My recent review recommends the role of the NECVCU services extends to all services. A case is being prepared by the force for enhancements in Action Fraud, the NFIB and the NECVCU. In these circumstances I am satisfied that the force, within the current available funds, is doing a comprehensive job to service cyber-dependent victims well. A better service will be provided when the NECVCU services are extended nationwide.”</p>

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, 3 complete and 1 in progress.

Recommendations & Areas for Improvement	Status	Due Date	Comment	
<p>4a</p> <p><u>Recommendation</u> By April 2020, all forces that haven't yet done so should:</p> <ul style="list-style-type: none"> • [1]record corruption using the national corruption categories; • [2]produce a comprehensive annual counter-corruption strategic threat assessment, in line with the authorised professional practice; and • [3] establish regular links between their counter-corruption units and those agencies and organisations who support vulnerable people. <p>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.</p>	<p>AMBER</p>	<p>April 2020</p> <p>Now November 2020</p> <p>[Subject to Co-vid] Aligned to PEEL 2018/2019 AFI 11</p>	<p>GREEN</p>	<p>Bullet 1 - The force is compliant recording corruption based on national corruption categories.</p>
			<p>GREEN</p>	<p>Bullet 2 - The force has produced a current force counter corruption Strategic Threat Assessment and control strategy 2020/21.</p> <p>The Control Strategy is to be published both on the force intranet and in the force's internal Professionalism Newsletter to raise awareness of the greatest identified threats.</p>
			<p>AMBER</p>	<p>Bullet 3 – The Professional Standards Dept has established and successfully recruited to a new post of Engagement Officer. Part of the remit of this post is to establish links and encourage reporting by partners of any corruption issues encountered including matters of Abuse of Position for a Sexual Purpose which they may encounter. An article was published in February 2020 'Skyline' raising awareness to the business community of the work of the force Counter Corruption Unit undertakes and encouraging the reporting of associated concerns.</p> <p>The force regularly attends the South Eastern Regional Counter Corruption Practitioners Group, chairs the South</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
				<p>Eastern Regional Analysts meeting and attends other national groups.</p> <p>To enhance counter corruption capability a new IT systems is being pursued. Specialist software has been identified; procurement and delivery will progress pending the release of a Microsoft 365 compatible version which has completed trials in 2 forces. Technical specifications and support requirements of the 365 compatible version are being evaluated.</p>
4b	<p><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.</p>	NEW GREEN	September 2020	<p>A full review of the force use of encrypted Apps was completed by the force Professional Standards Department in response to a data request from the Independent Office for Police Conduct.</p> <p>Use of encrypted Apps is covered in the force Counter Corruption Unit Control Strategy and associated plans. These plans refer to various covert methods to monitor officers and staff use of social media platforms including encrypted Apps.</p> <p>Planned improvements to the Counter Corruption Unit monitoring capability [new IT software] will ensure that force devices can be monitored.</p> <p>Guidance has been reviewed and republished on the use of WhatsApp [social media application].</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
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.	NEW GREEN	April 2020	Additional posts agreed and recruited to include: <ul style="list-style-type: none"> • an Engagement Officer seeking to increase intelligence reports • Vetting staff • 1 Detective Constable for the 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.

Recommendations & Areas for Improvement		Status	Due Date	Comment
8	<u>Recommendation</u> 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: <ul style="list-style-type: none"> • 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
<ul style="list-style-type: none"> • 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.

Next from PMG report

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

As a result of an inspection of Sussex Police a number of national recommendations and areas for improvement were made

This report makes 6 areas for improvement for the Police. 4 are for the force and complete

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>8</p> <p><u>Area for Improvement</u> 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>	NEW GREEN	<p>November 2019</p> <p>Now February 2020</p>	<p>An assurance report has been produced by the Head of the Public Protection unit. This report indicates the force is compliant with the protocol.</p> <p>A Crown Prosecution Service [CPS] single point of contact for rape and serious sexual offence for the force has been identified as a gap</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
				– the force Administration of Justice department is seeking a nomination from the CPS.

Crime Data Integrity inspection 2019

A force report by HMICFRS

Published August 2019

This report makes 6 areas for improvement for the force; 4 are complete, 2 to be progressed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Area for Improvement</u> 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	NEW GREEN	February 2020	Crimes are now raised within Control from the incident record, this went live 24 th June 2019. Timeliness of crime recording is monitored and reported to the force Crime Standards Board – an audit conducted in January 2020 found 97% classified with 24 hours.
3	<u>Area for Improvement</u> The force should immediately improve its standard of violent crime cancellation decisions	NEW GREEN	February 2020	Audits have been undertaken. All violent crimes were cancelled correctly. Additionally, the force crime registrar reviews non-crime reports alongside incident reports to ensure the need to record a crime has been negated and where necessary the person reporting has been informed that a crime will not be recorded.

Recommendations & Areas for Improvement		Status	Due Date	Comment
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	NEW GREEN	February 2020	Audits of crime cancellations have been undertaken and findings reported to the force Crime Standards Board. These audits found that 72% of victims had been informed – this represents an improvement.
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	September 2020	Age and gender have already been recognised within the HMICFRS report as being collected. The force has issued guidance regarding the recording of ethnicity and is now a mandatory field on the force crime recording system. Disability and sexuality data remain to be collected and analysed.
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	July 2020	Audit results have not met the desired standards and further steps are now being taken: <ul style="list-style-type: none"> • The Community Resolution process is being digitised – roll out imminent. • Guidance will be re-issued to officers for Community Resolutions, penalty notices for disorder and Cannabis Warnings • A 3 step escalation process for failures is being implemented, at the highest levels this could lead to management action of officers. • Monthly audits will be conducted; failures reported to Supt Ops UPD • The force Corporate Communications department will be engaged to support messaging • Digitisation of Cannabis Warnings and PND will be pursued.

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. 3 recommendations are complete 2 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
8	<p>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.</p> <p><u>Recommendation</u> Within six months, chief constables should make sure that victim needs assessments are always completed.</p>	NEW GREEN	January 2020	<p>The forces operates an op- out process in referring victims to victim support – this is the preferred option by HMICFRS.</p> <p>The offering of victim needs assessments is part of the qualitative dip samples undertake by the Crime Directorate.</p> <p>The results of dip samples are examined to ensure that all necessary action is being taken – results are reported to the force Crime Standards Board.</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 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>	AMBER	<p>January 2020</p> <p>Extended to November 2020 [Previously Reported to PAB]</p>	<p>The HMICFRS report recognises the good work of Economic Crime Victim Care Unit (ECVCU). There has been activity against this recommendation; dip sampling to ensure victim code of practise has been complied with – findings reported to Force Crime Standards Board.</p> <p>Rationale for deadline extension The force had plans to conduct 'victim journey' workshops which would have contributed as evidence for this. However the initial response to Co-vid has put this work on hold for the time being until a safe way to do this can be explored.</p> <p>With regard to non-economic crime victims:</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>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 Evidence that victims services have been reviewed [with partners] to establish if they can be enhanced, is still required. This element is being progressed by the force victim champion. Strategic Development will discuss with the Victims Champion how the 'victim journey' might be progressed in the absence of planned workshops.</p>
<p>17</p> <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	<p>January 2020</p> <p>However HMICFRS do not require the FMS to be submitted at this time</p> <p>September 2020 for review</p>	<p>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.</p> <p>Demand for calls for service by age analysis has been explored. However the incident recording system does not facilitate the collection of this type of data and alternatives are to be explored.</p> <p>Findings will be incorporated into the Force Management Statement.</p>

PEEL 2018/2019

A force report by HMICFRS

Published May 2019

This report makes 11 areas for improvement for the force; 8 complete 3 to be progressed.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>2</p> <p><u>Area for Improvement</u> The force should implement a process to get feedback from vulnerable victims.</p>	<p>AMBER</p>	<p>December 2019 set to align with the next inspection anticipated early 2020.</p> <p>Extended to June 2020 [Previously reported to PAB]</p>	<p>The Independent Domestic Abuse Advisor is a Victim Support appointment. This role has been identified as the role which will perform this process. Victim Support has twice progressed filling this position. Vetting failure prevented progress on the first recruitment cycle. A successful candidate has been identified from the second recruitment cycle. However in order for them to perform this function they will need access to Force Systems– a risk and mitigation assessment has been completed enabling this work to progress.</p> <p><u>Next steps</u></p> <p>This work requires the support of an analyst and although one was recruited to assist with this work they have been re-designated to Economic Crime work in line with force priorities at present.</p> <p><u>Rationale for deadline extension</u></p> <p>Deadline further extended to for reprioritisation of any analytical support. Additionally, this will be impacted by Co-vid owing to access to vulnerable victims during lockdown. Forces nationally have made a decision to suspend this work as the victims’ may currently be in</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			lockdown with the perpetrators, thereby putting them at further risk of abuse if any contact is made to discuss their cases.
<p>3</p> <p><u>Area for Improvement</u> The force should implement the necessary processes to share information with schools in relation to children affected by domestic abuse incidents, to ensure information is shared as quickly and effectively as possible.</p>	NEW GREEN	<p>December 2019 set to align with the next inspection anticipated early 2020.</p> <p>New deadline March 2020</p>	<p>Five out of six City schools have signed up to Op Encompass; the sixth school is being chased.</p> <p>Resident children do not necessarily school in the City and are more likely to attend in the MPS area.</p> <p>MPS plans for implementation of Op Encompass are phased; to mitigate against this the Public Protection Unit will contact the school/MPs directly in the MPS area. Public Protection Unit confirm that a referral has been made.</p>
<p>5</p> <p><u>Area for Improvement</u> The force should strengthen its response to county lines, which are criminal networks involved in the distribution of drugs to different areas of the country that frequently exploit children and vulnerable people.</p>	AMBER	<p>December 2019 set to align with the next inspection anticipated early 2020.</p> <p>Extended to October 2020</p>	<p>A peer review was conducted by the National County Lines Co-ordination Centre 20th and 21st November 2019 – the force received a favourable hot debrief and a report was anticipated January 2020 but was not received until February 2020.</p> <p>Whilst a positive report, there are areas to consider to further improve the force response.</p> <p><u>Next Steps</u></p> <p>Strategic Development has produced a draft programme of work based on the report for senior management to consider. Progress against accepted actions will be monitored via force Serious and</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
		[Previously reported to PAB]	<p>Organised Crime Board and the Partnership Board – partners will need to own some of the work identified, yet to be allocated.</p> <p><u>Rationale for deadline extension</u></p> <p>Review of the report and the development of a programme of works could not take place until February 2020. Progress against any agreed actions within the programme of works will be dependent upon any Co-Vid operational activities and the ability for partners to engage and own tasks.</p>
<p>6</p> <p><u>Area for Improvement</u> The force needs to address the deficit it has identified in its medium-term financial plan.</p>	<p>NEW GREEN</p>	<p>December 2019 set to align with the next inspection anticipated early 2020.</p> <p>Now March 2020</p>	<p>Since the 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.</p> <p>The MTFP and was submitted to Performance and Resources Committee [15/11/2019] by Head of Police Authority Finance – this paper provided an update on the current position and the forecast overspend.</p> <p>Medium Term Financial Plan Working Parties with Members of the Police Authority have also been held in the early part of 2020 to discuss and agree issues.</p> <p>Balanced positions are currently projected for 2020/2021.</p>

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.	NEW GREEN	December 2019 set to align with the next inspection anticipated early 2020.	<p>Although reflected as separate areas for improvement these both reflect the lack of an external scrutiny group at the time of inspection.</p> <p>Considerable efforts have been made to attract new members to this group and an Introductory day took place on the 11th June 2019.</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.	NEW GREEN	December 2019 set to align with the next inspection anticipated early 2020.	<p>The first meeting of the group took place on the 4th September 2019. The External Scrutiny reviewed both the Stop and Search and Use of Force dashboards at their meeting 11th March 2020. Further meetings are planned.</p> <p>The Police Authority also receives annual reports on Stop and Search Activity and also Custody and Use of Force every autumn for oversight and scrutiny.</p>
9	<u>Area for Improvement</u> The force should extend its unconscious bias training to all its workforce.	NEW GREEN	<p>No deadline set by HMICFRS</p> <p>December 2019 set to align with the next inspection Now March 2020</p>	<p>An online training package has been set to mandatory training for all officers and staff.</p> <p>Completion of training by the workforce is monitored and reported in at Performance Management Group in force.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
10	<p><u>Area for Improvement</u> The force should ensure its anti-corruption strategic threat assessment and control strategy are comprehensive, up-to-date and include current data.</p>	NEW GREEN	<p>December 2019 set to align with the next inspection anticipated early 2020.</p> <p>Now March 2020</p>	<p>These documents have been reviewed for 2018/2019 and 2019/2020.</p> <p>Minor amendments are being made to the anti-corruption control strategy ahead of publication on the force intranet.</p>
11	<p><u>Area for Improvement</u> The force should ensure that its counter-corruption unit:</p> <ul style="list-style-type: none"> • has enough capability and capacity to counter corruption effectively and proactively; • can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the force's data and identify computer misuse; and • builds effective relationships with individuals and organisations that support and work with vulnerable people. 	AMBER	<p>December 2019 set to align with the next inspection anticipated early 2020.</p> <p>Now November 2020 [Subject to Co-vid]</p>	<p>The first point has been addressed and recruitment is now complete and officers are in post and will continue to work on point three.</p> <p>In terms of the second point this will be complete upon the installation of new specialist software; this has been delayed.</p> <p>A project manager has been assigned but before agreement to proceed is given IT have raised concerns regarding compatibility issues with Microsoft 365 for chosen option. 2 forces have piloted a 365 compatible version. The 2 trial forces have finished their periods of testing and have confirmed that the new system is compatible with the 365 environment and the company has reissued their technical specifications and plans to support the Microsoft 365 environment. This has been viewed by the technical architect in force and discussions continue.</p>

Fraud: Time to Choose

**A national report by HMICFRS
Published April 2019**

This report makes 18 AFIs and recommendations for the force, 17 are complete 1 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><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 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>	AMBER	<p>September 2019, March 2020</p> <p>Extended to November 2020 [Previously reported to PAB]</p>	<p>The requirement is to 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. The delayed delivery of enhancements and related dispute with the supplier have prevented a timetable being produced and communicated to Chief Constables.</p> <p><u>Next Steps</u> Further communication to Chief Constables is planned as key decisions are made regarding the way ahead. Next steps were considered at the PAB meeting on the 27th April 2020.</p> <p><u>Rationale for deadline extension</u> The deadline is extended to enable implementation of decisions made regarding the future delivery of the service.</p>
2	<p><u>Recommendation</u> 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>	NEW GREEN	March 2020	<p>New guidance was issued to forces late September 2019. The production of monthly exception report [these support accuracy and efficiency] commenced in March 2020 and will be distributed to all forces and their respective PCCs.</p>
5	<p><u>Recommendation</u> 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>	NEW GREEN	March 2020	<p>A Strategy has been developed; consultation has taken place with PCCs, NECC and other priority stakeholder.</p>

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"> • 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. <p>The implementation arrangements for the strategy should include clear communication and review processes.</p>	NEW GREEN		<p>The final version of the strategy was signed off by Chief Council October 2019.</p> <p>National governance processes for fraud have been agreed by the Regional Organised Crime Unit Executive Board and National Economic Crime Centre Fraud Gold Group. Regional threat groups now being established - distributed to forces and PCCs</p> <p>Internal governance processes have been agreed and implemented.</p>
<p>9</p> <p><u>Recommendation</u> By 30 September 2019, chief constables should publish their force's policy for responding to and investigating allegations of fraud (in relation to both calls for service and National Fraud Intelligence Bureau disseminations for enforcement).</p>	NEW GREEN	<p>September 2019</p> <p>Extended to February 2020</p>	<p>The ECD Fraud team case acceptance Policy SOP has been reviewed and published internally.</p> <p>An external statement has been finalised and published on the force external website.</p>
<p>10</p> <p><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</p>	NEW GREEN Pending sign-off	<p>March 2020</p>	<p>The force submitted a Police Transformation Fund bid to uplift resources to create a national network, this in part, to support the required evaluation.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
	evaluating the effectiveness of how that advice is given to the public and the effectiveness of the advice.	force Fraud delivery group 26/6/20		This bid was not successful and alternatives arrangements have been made. Support has been obtained from a partner to develop an evaluation framework. NFIB outputs co-ordinators will be responsible for reviewing the returns from alerts issued. A closure report is to be submitted to the ECD HMICFRS Recommendations Delivery Group [26/6/2020] for formal sign-off.
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	A deadline for delivery is to be agreed	This action is for the Director General of the National Crime Agency in consultation with the National Police Chiefs' Council Coordinator for Economic Crime CoLP continue 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"> 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. 	NEW GREEN	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. Radio and sports stadium advertising has taken place and continues to the summer of 2020. Evaluation to date has identified that 5.5 million

Recommendations & Areas for Improvement	Status	Due Date	Comment
			people have been reached by this messaging. Across this period there has been a notable increase in engagement across the Action Fraud social media channels.
<p>16</p> <p><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:</p> <ul style="list-style-type: none"> • 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). 	<p>NEW GREEN</p>	<p>September 2019</p> <p>Extended to April 2020</p>	<p>Guidance has been produced and distributed chief constables and Action Fraud which addresses each of the bullets in this recommendation.</p>

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 13 are complete, 8 are in progress

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>2</p> <p><u>Area for Improvement</u></p> <p>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.</p>	<p>AMBER</p>	<p>December 2019 to align with the HMICFRS return visit</p> <p>Now extended to July 2020, subject to review, to align with Transform</p>	<p>A process is in place to monitor and review the availability of fully accredited staff.</p> <p>Overtime monitoring has been enhanced and authorisation changed to the Custody Manager from Group Inspectors.</p> <p>Duty planning allocate shifts to resilience officers to ensure they maintain their accreditation.</p> <p>An alternate process for allocation of resources was implemented; controlled by Custody Inspector. A dedicated Custody staffing group has been established on a 3 month rolling basis sourced from Response Groups, alongside Dedicated Detention Officers and Custody Gaolers to improve both experience and skills and to better control cover and requirement for overtime.</p> <p>Work has been completed to reconcile skills records in the force training records system with a custody training Tracker. This has delivered accurate availability of Custody skills report and facilitates more effective use of Duty Management System for planning purposes.</p> <p>Custody management demand to be feed into the force change programme [Transform].</p> <p>Tasks to be progressed:</p> <p>Transform programme [Custody] – work is ongoing; Custody being considered within the Investigation strand with proposals to develop alongside the Administration of Justice function in. Detailed staffing structure model being prepared.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
3	<p><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.</p>	AMBER	<p>December 2019 to align with the HMICFRS return visit</p> <p>Extend to November 2020</p>	<p>Van docking arrangements have been formalised. New design guidelines published by Home Office have been fed into the Accommodation Team. Accommodation Team have contacted National Police Estates Group (NPEG) who have agreed to conduct a review of force custody new build plans at the appropriate stage. This will include review of a series of key documents, a one day workshop plus interviews with relevant operational custody stakeholders.</p> <p>Tasks to be progressed: Date for maintenance works in Custody is being scheduled – date to be confirmed.</p> <p>Adaptions (lowering of call bell in 1 cell) and introduction of hatched ‘no loitering area’ in reception area are programmed to be delivered during Suite closure.</p> <p>Rationale for extending date: delays around co-ordination of maintenance teams, use of BTP facilities and operational requirements of force. This is now further impacted by restrictions of Covid-19 so deadline further extended to Nov 19 (but subject to ongoing review as circumstances allow).</p>
5	<p><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.</p>	AMBER	<p>December 2019 to align with the</p>	<p>Performance data has begun to be defined, collected and analysed - work in progress following development of daily/monthly and quarterly Custody performance reports by PIU.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
		HMICFRS return visit Extended to July 2020	Immediate issue identified and challenged with contractor - recording successful coverage of shift when only partial cover provided. Reporting practices to be amended by contractor. Deadline rationale: deadline extended to enable further development of performance report.
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 Extended to June 2020	The force Performance Information Unit produce daily reports which include last 24 hours and 7 day statistics. Monthly performance reports are circulated to the Uniform Policing Directorate senior management team for oversight. The force Custody Management Group reviews use of force performance reports on a regular basis. Specific reports are also commissioned – including disproportionality. Quarterly reporting is ongoing to the force custody management group. A memorandum of understanding for the Appropriate Adult Service is nearing completion. This includes a performance reporting requirement. Deadline rationale: deadline extended to June 2020 to allow for sign off of the Appropriate Adult MOU.
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	NEW GREEN	December 2019 to align with the HMICFRS return visit	Following introduction and embedding with custody management regime of tiered dip sampling process there has been a noticeable improvement in the quality of completed custody records

Recommendations & Areas for Improvement		Status	Due Date	Comment
	the custody records meet the required standards.		then Feb 2020 Now September 2020	A number of 'Show Me Good Guides' have also been produced (and added to force database for officer reference.
8	<p><u>Area for Improvement</u></p> <p>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.</p>	NEW GREEN	December 2019 to align with the HMICFRS return visit Extended to April 2020	<p>A benchmarking request was submitted to all forces for learning opportunities; responses have been reviewed.</p> <p>Diversity / demographic data has been included in monthly performance reports.</p> <p>Custody Manager commissioned the force Performance Information Unit to conduct an investigation concerning disproportionality looking at throughput, arrest offences, disposal offences and first disposals. A findings report has been produced and was presented to the force Custody Management Group.</p> <p>A reporting tool for Health & Safety incidents is being investigated to incorporate diversity information results to be included in the Custody Manager's report to the force Custody Management Group.</p>
9	<p><u>Area for Improvement</u></p> <p>Staff should routinely consider, and take any appropriate actions to preserve, detainees' privacy at the booking-in desk.</p>	AMBER	December 2019 to align with the	A mitigation has been identified [laptops utilised in a private side room] and has been communicated to officers and included within Continuing Professional Development - safeguarding and welfare responsibilities.

Recommendations & Areas for Improvement	Status	Due Date	Comment
		HMICFRS return visit Extended to Nov 2020	<p>Hatching 'no loitering' area in Reception to be marked up to minimise opportunity to view CCTV monitors, works originally scheduled for Nov 2019 cancelled due to operational requirements and to be rescheduled. New date not yet confirmed but has been followed up by Custody Manager.</p> <p>Rationale for extending date: delays around co-ordination of maintenance/cleaning teams, use of BTP facilities and operational requirements of force. This is now further impacted by restrictions of CoVid-19 so deadline extended to Nov 2020 (but subject to ongoing review as circumstances allow).</p>
<p>10</p> <p><u>Area for Improvement</u> The approach to managing some elements of risk should be improved. In particular:</p> <ul style="list-style-type: none"> • [1]Detainees who are intoxicated should be placed on observation levels that include rousals. • [2]Detainees' clothing and footwear should only be removed based on an individual risk assessment. • [3]All custody staff should be involved collectively in shift handovers. 	NEW GREEN	December 2019 to align with the HMICFRS return visit Now March 2020	<p>Standard operating procedure has been reviewed and published</p> <p><u>Detainees who are intoxicated</u> – bullet 1 Continuing professional development sessions have been conducted which has included this matter. Information also fed back to Learning and Development department trainer for incorporating into future refresher training.</p> <p>Revised qualitative dip sampling template incorporates checking of rousals; custody records compared to custody CCTV. Findings [including good practises] are used by supervisors and learning and development</p> <hr/> <p><u>Detainees' clothing and footwear</u> – bullet 2 Reminders have been issued to all Custody staff This will be further reinforced at ongoing rolling continuing professional development sessions.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>Learning and Development trainer advised to incorporate in Custody refresher training package.</p> <p>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.</p> <p><u>Collective in shift handovers – bullet 3</u> A new procedure for Custody handovers has been implemented. Guidance on requirements for each shift and role (including Health Care Professional) has been provided alongside a Statement of Expectations for Custody Officers and Dedicated Detention Officers.</p> <p><u>Explain to detainees who are held ‘incommunicado’ the reasons for this.</u></p> <p>Reminders have been issued to Custody staff.</p> <p>Revised dip sampling template includes an assessment of whether Rights& Entitlements, if delayed, is with sufficient reason or not.</p> <p>Monitoring of overarching dip sampling results from Qtr2 2018/2019 onwards reveal trend analysis and compliance which can then be addressed accordingly.</p> <p><u>Ensure all custody staff provide translated documents</u></p> <p>Documentation is now readily accessible via the force custody system.</p> <p>This information/process is being provided to all Custody Officers via continuing professional development sessions and through Custody Initial and Refresher training.</p> <p>Revised dip sampling template includes a specific test for this.</p>

	Recommendations & Areas for Improvement	Status	Due Date	Comment
				Results of dip samples to identify if the required change has been embedded.
12	<p><u>Area for Improvement</u></p> <p>The force should strengthen its approach to conducting PACE reviews of detention by:</p> <ul style="list-style-type: none"> • [1]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 • [2]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 sleeping, as required by paragraph 15.7 of PACE code C. 	AMBER	<p>December 2019 to align with the HMICFRS return visit</p> <p>Extended to July 2020 subject to review</p>	<p><u>Requirements of section 107 of PACE – authorisation of acting / temporary inspectors – bullet 1</u></p> <p>Uniform Policing Directorate has determined that processes for authorisations being given are:</p> <p>a) planned /long term authorisations given in advance given and recorded at Uniform Policing Directorate Local Resource Planning meeting.</p> <p>b) for unplanned ad hoc duties. Authority for acting up to Duty / PACE Inspector on an ad hoc basis within Uniform Policing Directorate [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>Dip sampling specifically seeks to identify compliance.</p> <p><u>Reviews for detainees held in the custody suite on behalf of others forces – bullet 2</u></p> <p>Statement of Expectations for Custody Police Sergeants being reviewed. This will include requirement to escalate those cases to Duty Inspector which Custody officer considers are not being</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>progressed expeditiously with particular reference to 'other force' detained persons. Statement of Expectations for Duty Inspector also being reviewed, updated and reissued to include this requirement.</p> <p>Next Steps: Learning & Development [L&D] have prepared a lesson plan for role of Duty/PACE Inspector but as yet have not been able to resource delivery of training programme – still to be timetabled.</p> <p><u>Accurate and detailed entries on the custody detention log</u> Included with the dip sample process</p> <p>Rationale for deadline: Extend deadline to July 2020 to allow time for L&D to resource (extended period due to turnover of staffing within L&D impacting delivery timetable).</p>
<p>13</p> <p><u>Area for Improvement</u> Staff should conduct and record standardised daily cell checks</p>	<p>NEW GREEN</p>	<p>December 2019 to align with the HMICFRS return visit</p> <p>Then February 2020</p>	<p>Daily cell checks are undertaken by Dedicated Detention Officers in line with PACE and Health & Safety requirements and are recorded as such in Custody records.</p> <p>A standardised template has been introduced for weekly full suite checks which is monitored by the Custody Manager.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
		Extended to May 2020 [Reported to PAB]	
<p>14</p> <p><u>Area for Improvement</u> The force should ensure that all custody staff take part In an annual fire drill</p>	NEW GREEN	December 2019 to align with the HMICFRS return visit Extended to March 2020 (completion of table top exercise for all groups	<p>All custody staff have completed a specific fire (evacuation) training session and recorded in a Fire Evacuation Exercise Record Document.</p> <p>The Custody Inspector has consulted with City of London Corporation Emergency Planning Officer, to devise and participate.</p> <p>A live exercise is being planned for 2020.</p> <p>This will be in addition to any Facilities Management planned exercises and other unplanned incidents that take place in year.</p>
<p>15</p> <p><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:</p> <ul style="list-style-type: none"> The force should collate accurate data concerning the use of force and ensure that all incidents are adequately recorded on custody records. 	NEW GREEN	December 2019 to align with the HMICFRS return visit	<p>Work has been conducted with the Performance Information Unit to develop a reconciliation process between the force system for recording use of force and application of use of force as detailed in Custody records. Accurate records have been achieved latest reports show 100% compliance.</p> <p>A dip sampling process is in place, reviewing CCTV footage cross referenced to custody record. Finding from dip samples are used for learning opportunities.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<ul style="list-style-type: none"> 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. 		Extended to June 2020	External publication of Custody use of force data is being considered.
<p>16</p> <p><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.</p>	NEW GREEN	<p>December 2019 to align with the HMICFRS return visit</p> <p>Now March 2020</p> <p>Extended to December 2020 [funding only]</p>	<p><u>Exercise Yard</u> The Accommodation Project Team have now secured funding for this project utilising underspends from the accommodation decant City of London Police budget. A small minor works project has been set up with City Surveyors. Covid 19 restrictions are delaying obtaining competitive quotes but the process continues.</p> <p><u>Issue of toilet paper and replacement footwear</u> Reminders have been issued and will be raised again at the next series of rolling continuing professional development sessions to embed.</p> <p>All detained persons to be encouraged to wear footwear provided when they are moving around suite outside of cell.</p> <p>Dip sampling of initial Risk Assessment records to ensure actions taken in respect of risks identified are adequately recorded.</p>
<p>17</p> <p><u>Area for Improvement</u> 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	Completion of The Appropriate Adult Service memorandum of understanding is nearing completion - final amendments and sign-off pending. Appropriate adult cover being extended to include vulnerable adults as well as children and for 24/7.

Recommendations & Areas for Improvement	Status	Due Date	Comment
		HMICFRS return visit Extended to June 2020	Deadline rationale: deadline extended to June 2020 to allow for completion and sign off of Appropriate Adult arrangements
18 <u>Area for Improvement</u> 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.	NEW GREEN	December 2019 to align with the HMICFRS return visit Now March 2020	Data extract work is being undertaken within the Performance Information Unit to support performance monitoring. Contractor Operations Manager provides a rota detailing when Health Care Practitioners are available at Bishopsgate Police Station and when on call. Joint Contractor/City of London Police performance meetings take place - an agreed agenda format is now being used which incorporates issues log, resourcing, rotas, and performance report as standing items. Monthly meetings for remainder of year have been scheduled.
19 <u>Area for Improvement</u> The provision of the planned embedded seven-day pilot scheme should be introduced as soon as practically possible.	NEW GREEN	December 2019 to align with the HMICFRS return visit Now March 2020	Liaison and Diversion are a 'free service' provided by the NHS and it is outside of the Force's control as to what it actually receives. The pilot as reported to HMICFRS has not fully materialised due to Liaison and diversion [L&D] resourcing and funding issues. Whilst L&D staff are not permanently located within Bishopsgate Police Station, 24/7 services can still be accessed across this timeframe via a call out process. The force does maintain a good working relationship with L&D managers who can and do address any shortcomings identified.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>20</p> <p><u>Area for Improvement</u></p> <p>The recording of release arrangements, to ensure that detainees are released safely, should be more detailed.</p>	<p>AMBER</p>	<p>December 2019 to align with the HMICFRS return visit</p> <p>Now March 2020</p> <p>Now July 2020</p>	<p>This was included in continuing professional development sessions for Custody Officers.</p> <p>A dip sampling template examines this area with results showing that pre-release risk assessments are more comprehensive and detailed, showing actions the Custody Officer has taken to ensure that the safety of the detained person is paramount upon release.</p> <p>Show Me Good guidance documents have been produced and placed on Force database including one for a Pre-release risk assessment.</p> <p>A review of travel assistance offered upon release has been conducted. Outcome, agreed to secure and supply travel warrants to cover both national (Network Rails) and local (TfL) warrants for issue to detained persons as necessary.</p> <p>Method of establishing an account with the Rail Delivery Group has been sourced and now liaising with force Finance team for delivery of supporting financial arrangements to complete. Suitable contact and arrangements with TfL still to be sourced.</p> <p>Rationale for Deadline: To allow time for processes to be put in place and arrangements secured with TfL.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
22	<u>Area for Improvement</u> Detainees should be moved to escort vehicles in a way which protects their dignity and privacy.	NEW GREEN	December 2019 to align with the HMICFRS return visit Now Jan 2020	In the absence of a 'van dock' to the custody suite, the Uniform Policing Directorate Head has directed that drivers of vans / cars delivering to or conveying prisoners from Bishopsgate Police Station must reverse to the station doors. This will relieve the risk of indignity as highlighted by the inspection, but also maximise officer safety and minimise risk of prisoner escape, thereby minimising physical risk to prisoners. Dignity and Respect SOP has been updated and published to include guidance re van docking requirements.

Policing and Mental Health - Picking Up the Pieces

A national joint report by HMICFRS
 Published November 2018

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

Recommendations & Areas for Improvement		Status	Due Date	Comment
3	<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	WHITE	August 2019	Practise guideline from the College of Policing to help force benchmark their triage activity are pending. However this is something which the force already undertakes – the most recent assessment examined the period November 2018 to

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>services with partners to make sure mental health care needs are being met.</p> <p>If forces find any deficiencies in their triage services, they should take steps to address them as soon as reasonably practicable.</p> <p>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>			<p>October 2019 and highlighted a business need for mental health nurse cover during the day.</p>

Understanding the difference: the initial police response to hate crime

A national joint report by HMICFRS
Published July 2018

This report makes 15 recommendations. 8 are for the force and 7 of these are complete, 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
<p>6</p> <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></p>	<p>NEW GREEN</p>	<p>October 2018</p> <p>Extended to February 2019</p> <p>Extended to:</p>	<p>The Crime Screening, Allocation Finalisation SOP includes Flagging guidance for online cyber enabled and cyber dependant.</p> <p>The Performance Information Unit have confirmed that this flag is used to extract data from forces systems and used within returns to the Home Office.</p> <p>The force crime and incident registrar conducts audits the results of which are reported to the force Crime Standards Board. These audits</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>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>		<p>September 2019 Now March 2020</p>	<p>frequently involve the reviewing of flags [including cyber] to ensure they have been applied appropriately or omitted. Crime Standards Board [27/2/20] received a report 'Crime outcomes audit' which found that correct [mandatory] flags were applied in 77% of cases, however all online [cyber enabled/dependant] flags were accurately recorded.</p>
<p>8</p> <p><u>Recommendation</u> Our inspection shows that some hate crime victims get a better service than others. This is because forces apply the national minimum standard of response to victims of hate crime inconsistently.</p> <ul style="list-style-type: none"> • 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. 	<p>WHITE</p>	<p>January 2019</p>	<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 consultation closed 5/11/2019. There is currently no date for formal publication. College of Policing APP website last checked 19/5/2020.</p>

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 apply to the force and are to be progressed.

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

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p data-bbox="125 592 143 616">3</p> <p data-bbox="208 467 427 491">Recommendation</p> <p data-bbox="208 504 936 743">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.</p>	<p data-bbox="1014 592 1099 616">WHITE</p>	<p data-bbox="1151 504 1285 671">September 2018 And January 2019</p>	<p data-bbox="1317 268 2107 331">Details of the peer review approach have not been released by the College of Policing at this time.</p> <p data-bbox="1317 376 2130 759">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.</p> <p data-bbox="1317 807 2085 903">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.</p>