

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.

Police super-complaint¹: police data sharing for immigration purposes

A Joint national report following an investigation by HMICFRS, College of Policing and the Independent Office for Police Conduct

Published 17th December 2020

There are 4 actions for the force – these are currently being considered by the force.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> As an interim measure, pending the outcome of recommendation 2, where officers only have concerns or doubts about a victim's immigration status, we recommend that they immediately stop sharing information on domestic	AMBER	No deadline set as yet. February 2021	This is a new report which the force is currently considering.

¹ The police super-complaints system allows designated organisations to raise issues and became operational on 1st November 2018. Individuals cannot make super-complaints. Super-complaints can only be submitted by organisations designated by the Home Office. Designated bodies may submit super-complaints for consideration by HMICFRS, the College of Policing and the IOPC.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>abuse victims with Immigration Enforcement. Instead, police officers should link the victim to a third party that can provide advice and assistance, as set out in recommendation 4 (on the creation of safe reporting pathways).</p> <p>This applies where police officers have doubts about a victim's immigration status, not where they have evidence that an offence has been committed. The College of Policing will immediately develop guidance for the police service to clarify this aspect of practice.</p> <p>Notes to recommendation 1</p> <p>This recommendation to stop information sharing only applies to victims of domestic abuse.</p> <ul style="list-style-type: none"> • The College of Policing guidance will also clarify the difference between insecure and uncertain status and immigration offending. • Any sharing of information should be done in compliance with Information Commissioner's Office (ICO) guidance. • 'Third party' could include a local or national specialist victim support organisation or another individual/organisation that can act as an intermediary and advocate on the victim's behalf in communications with Immigration Enforcement – as required. 		for initial review	
<p>2</p> <p><u>Recommendation</u></p> <p>Review the legal framework and policy underpinning the matters raised in this super- complaint with the aim of providing clarification to the police service, other public services and immigration authorities on priorities regarding all</p>	WHITE		This action is for the Home Office

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>migrant victims and witnesses of crime with insecure immigration status.</p> <p>The review should address the wider matters of public policy raised in this super- complaint as well as those relating to policing and domestic abuse. It should include consideration of the interim measure outlined in recommendation 1, associated guidance and further consideration of a mechanism for establishing a firewall between police and immigration enforcement services for all migrant victims of crime with insecure immigration status. It should determine a working definition of a firewall in this context with reference to the conclusions of this report, international examples of such practice and any relevant academic research. The review should identify the correct basis on which any proposed firewall should be implemented.</p> <p>The effect of the review should be to establish safe reporting mechanisms for all migrant victims and witnesses, including those with insecure immigration status, in accessing the police service. The review should be conducted in consultation with victim and survivor representative groups, practitioners and other interested parties. The Home Office should publish a report that sets out its considerations and conclusions, and includes an equality impact assessment, within six months of the date of publication of this super-complaint report.</p>			
<p>3</p> <p><u>Recommendation</u></p> <p>With the objective of preventing harm to the public interest, develop a safeguarding protocol between the Home Office and the police service to guide responses to all migrant victims and witnesses of crime by the police service, the Home Office and</p>	<p>WHITE</p>		<p>This action is for the Home Office and NPCC</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>other law enforcement agencies as relevant. The protocol should reflect the realities of victims' and witnesses' experiences, drawing on the expertise of the relevant specialist organisations for supporting victims with insecure immigration status. The protocol would need to have some inbuilt flexibility and also:</p> <ul style="list-style-type: none"> • address the respective roles and responsibilities of the police and the Home Office in safeguarding migrant victims of crime, with explicit attention to differences in approach that may arise for victims in different circumstances; • for victims of domestic abuse or other gender-based violence, clarify that it is the responsibility of the police service, working with suitable specialist partner agencies, to provide safeguarding functions, and that sharing information on victims of domestic abuse with Immigration Enforcement does not constitute safeguarding; • address the purposes of sharing information, as well as who does what with the information, how it will be acted on by the Home Office, and in what circumstances, with agreement about the terms of assurances that can be provided to victims and witnesses; • specify the circumstances in which information may be shared by police with the Home Office and ensure that victims and witnesses are told what information is to be shared and why, with reference to their clear basis in law to share; • be supported by appropriate governance processes to ensure that: 			

Recommendations & Areas for Improvement	Status	Due Date	Comment
<ul style="list-style-type: none"> • personal data is processed in accordance with data protection law; • due consideration is given to security (both in sharing and storage), retention and deletion of personal data; and • all organisations can demonstrate accountability. • reflect consultation with data protection officers and reference to relevant Information Commissioner’s Office guidance to ensure that data sharing is compliant with data protection law and clearly documented; • address the implications for data sharing within multi-agency risk assessment conferences (MARACs) and other multi-agency safeguarding groups; • set out a nationally equitable position on access to specialist victim support services that can assist victims in resolving uncertainties associated with immigration status; • enable the victim or witness to contribute to any potential prosecution so that perpetrators are held to account and that the victim or witness is supported to contribute to any potential prosecution, in the public interest; and • be publicised through the appropriate channels to promote migrant victims’ and witnesses’ confidence in the existence of safe reporting pathways to receive support from the police and other statutory agencies without fear that their immigration status will be prioritised over their complaint to the police. <p>• This protocol should be adopted by the police service across England and Wales. When the protocol has been agreed, the National Police Chiefs’ Council should consider how to operationalise it in consultation with the College of Policing so that the contents inform police responses.</p>			

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p data-bbox="210 268 423 293"><u>Recommendation</u></p> <p data-bbox="210 304 943 512">With reference to recommendation 1, and in consultation/collaboration with local or national specialist organisations, chief constables should take steps to ensure that all migrant victims and witnesses of crime are effectively supported through safe reporting pathways to the police and other statutory agencies. They should:</p> <ul data-bbox="210 555 965 1345" style="list-style-type: none"> <li data-bbox="210 555 943 619">• ensure there is a proper policy and practice framework in place for officers to work within; <li data-bbox="210 630 965 730">• develop victim and witness support policies that reflect the characteristics of the safeguarding protocol set out in recommendation 3, and: <li data-bbox="210 742 943 842">• draw on all relevant national guidance with particular reference to the Code of Practice for Victims of Crime and data protection legislation; <li data-bbox="210 853 965 954">• are developed in partnership with and include pathways to the relevant specialist organisations for supporting victims and witnesses with insecure immigration status; <li data-bbox="210 965 965 1029">• are clear about the circumstances in which information will be shared by police with immigration enforcement; <li data-bbox="210 1040 965 1104">• provide clarity about the purpose of sharing information at different points of the pathway; and <li data-bbox="210 1115 931 1248">• explicitly recognise the importance of telling victims, witnesses and supporting agencies whether information will be shared with Immigration Enforcement, and if so, when and in what circumstances. <li data-bbox="210 1259 943 1345">• promote understanding among police officers and staff to differentiate between responses to victims of modern slavery/human trafficking and victims of domestic abuse; 	<p data-bbox="1005 778 1104 804">AMBER</p>	<p data-bbox="1151 699 1323 890">No deadline set as yet. February 2021 for initial review</p>	<p data-bbox="1352 778 2074 804">This is a new report which the force is currently considering.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<ul style="list-style-type: none"> • promote awareness within their forces of any existing pathways to specialist organisations for supporting victims with insecure immigration status; • ensure the policy and practice framework is adopted by all officers and staff who come into contact with victims of crime who have insecure immigration status; and • promote police engagement in regular outreach community work, as highlighted as good practice in this report. 			
<p>5</p> <p><u>Recommendation</u> With reference to recommendation 1, pending the developments outlined in other recommendations, and in consultation/collaboration with local or national specialist organisations, chief constables and police and crime commissioners should take steps, through the appropriate channels, to promote migrant victims' and witnesses' confidence in reporting crimes to the police through safe reporting pathways, without fear of prioritised immigration control.</p>	AMBER	No deadline set as yet. February 2021 for initial review	This is a new report which the force is currently considering
<p>6</p> <p><u>Recommendation</u> To police and crime commissioners (or equivalents) Conduct an assessment of local access to specialist victim support organisations or networks and take any necessary steps to build up such networks.</p>	WHITE		This action is not for the force but is directed to Police Authority Board
<p>7</p> <p><u>Recommendation</u> To the Home Office Improve the recording and assurance processes related to sharing information with the police. In particular, record the status, ethnicity and nationality of people referred, or</p>	WHITE		This action is for the Home Office

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>enquired about, to the National Command and Control Unit within Immigration Enforcement in order to understand and record whether the caller believes the individual to be a victim, offender or both. Collect and monitor data on the use of the Police National Computer for immigration purposes, including the number of live markers in operation. This is broader than addressing the lack of data. The investigation considers it is essential to understanding and differentiating the appropriate range of actions in individual cases, including compliance with the Code of Practice for Victims of Crime. Such data will aid transparency with the particular objective of assuring the public that all victims and witnesses are treated fairly and equitably regardless of their protected characteristics.</p>			
<p>8</p> <p><u>Recommendation</u> To all recipients of recommendations from this investigation</p> <p>Provide an update to Her Majesty's Chief Inspector of Constabulary on progress in implementing these recommendations within six months of the date of publication of this report.</p>	<p>AMBER</p>	<p>June 2021</p>	<p>Strategic Development report the progress of all open actions to the HMICFRS Force Liaison Lead.</p> <p>Action plans for new reports are also to be produced in consultation with the HMICFRS FLL.</p>
<p>9</p> <p><u>Action</u> To the College of Policing</p> <p>Work with interested parties to consider how domestic abuse risk assessment tools used by the police and partner organisations can include immigration status as a risk factor.</p>	<p>WHITE</p>		<p>This action is to the College of Policing</p>
<p>10</p> <p><u>Action</u> To the College of Policing</p>	<p>WHITE</p>		<p>This action is to the College of Policing</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
	When updating knowledge and training products, ensure that the messaging across all relevant guidance is consistent about the need for policing to balance the needs for safeguarding a victim or witness against the national interest in investigating crime.			
11	<p><u>Action</u> To HMICFRS</p> <p>Subject to available funding from the Home Office, HMICFRS will consider whether future inspection activity and/or monitoring could review how the issues raised by this super-complaint are being addressed by forces, once they have had an opportunity to make changes in the light of this investigation.</p>	WHITE		This action is to HMICFRS

‘Feeling heard’: partner agencies working together to make a difference for children with mental ill health

A National report HMICFRS

Published 9th December 2020

This report describes the findings from 6 Joint Targeted Area Inspections [JTAs] – there are no recommendations. The report has been circulated for learning opportunities.

Pre-charge bail and released under investigation: striking a balance

A Joint National report, HMICFRS and HMCPSi

Published 8th December 2020

There are 10 recommendations 2 of which are for forces. These are currently being considered by the force.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><u>Recommendation</u> The Home Office should work with police and the College of Policing to review the legislation for bail and RUI. The bail consultation completed in 2020 should provide evidence for reviewing who must authorise bail and time frames for bail extensions. The learning from this report should inform this work.</p>	WHITE		This action is for the Home Office
2	<p><u>Recommendation</u> The Home Office should work with police and the College of Policing to make sure forces have enough time and adequate resources to prepare for any future changes to the legislation which arise from the bail consultation. They should also provide police forces with comprehensive guidance and protocols on the changes.</p>	WHITE		This action is for the Home Office
3	<p><u>Recommendation</u> The Home Office and the National Police Chiefs' Council (NPCC) should work together to develop and put in place data collection processes to give an accurate national picture of RUI and pre-charge bail.</p>	WHITE		This action is for the Home Office and NPCC lead
4	<p><u>Recommendation</u> The Home Office should work with police forces and the College of Policing to develop and implement monitoring arrangements to make sure that changes resulting from the bail consultation are effective.</p>	WHITE		This action is for the Home Office

Recommendations & Areas for Improvement		Status	Due Date	Comment
5	<u>Recommendation</u> The Home Office should work with the NPCC, the CPS and the College of Policing to make sure that any changes to the legislation secure improvements for victims of crime	WHITE		This action is for the Home Office
6	<u>Recommendation</u> The College of Policing should work with the NPCC to ensure that clear guidance is developed for officers in relation to updating suspects who are RUI on the progression of their cases.	WHITE		This action is for the College of Policing
7	<u>Recommendation</u> The College of Policing and NPCC should work together to develop clear guidance for police forces so that all cases involving serious harm and risk, such as domestic abuse and stalking, are subject to bail with conditions to protect victims and require a new risk assessment before a suspect's bail status changes.	WHITE		This action is for the College of Policing
8	<u>Recommendation</u> Forces should develop processes and systems to clearly show whether suspects are on bail or RUI. This will help them to better understand the risk a suspect poses to victims and the wider community and will help to increase safeguarding.	AMBER	No deadline set yet. March 2021 [for initial review]	This is a new report which the force is currently considering.
9	<u>Recommendation</u> Forces should record whether a suspect is on bail or RUI on the MG3 form when it is submitted to the CPS. This should be regularly checked and any changes in bail or RUI provided to the CPS. The CPS should work with the police to ensure this information is provided.	AMBER	No deadline set yet. March 2021 [for initial review]	This is a new report which the force is currently considering.
10	<u>Recommendation</u> The CPS and NPCC should work together to review their service level agreements and make sure that cases can be charged at the earliest opportunity.	WHITE		This action is for the CPS and NPCC lead.

Roads Policing – Not Optional

A National report HMICFRS

Published 15th July 2020

There are 10 recommendations for the force, 3 are completed, 1 closed [not applicable] and 6 in progress.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>6</p> <p><u>Recommendation</u></p> <p>With immediate effect, chief constables should make sure:</p> <ul style="list-style-type: none"> • [1]their force has enough analytical capability (including that provided by road safety partnerships) to identify risks and threats on the road network within their force area; • [2]that information shared by partners relating to road safety is used effectively to reduce those risks and threats; and • [3]there is evaluation of road safety initiatives to establish their effectiveness. 	<p>NEW RED</p>	<p>September 2020 for an initial position</p> <p>November 2020 for review and reinstatement of the RDRP meetings by the CoL</p> <p>New deadline April 2021 [subject to review]</p>	<p>The main reasons for the delay to this recommendation are as follows:</p> <ul style="list-style-type: none"> • CoL suspended the Road Danger Reduction Partnership(RDRP) meetings until recently (resumed on 11th Jan) • Sustained analytical support has been an issue for the Roads Policing unit previously. The Force Intelligence Bureau, who provide this support is aware of the issue and intends to produce a dashboard on a quarterly basis. The next quarterly dashboard will be produced post Jan 21, but owing to reduced traffic volumes in the City because of Covid restrictions/ lockdown it will not illustrate a ‘typical’ picture. • The City of London Corporation Department of Built Environment has no analytical capability. However, the expectation seems to be that City of London Police provide the analysis for the City of London to use. It is questionable whether this is an acceptable position and

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>needs to be considered by the RDR partnership and a resolution put in place.</p> <ul style="list-style-type: none"> • Owing to lack of capability no analysis reports were submitted for consideration. • Re: Evaluation of road safety initiatives- City of London Police officers continue to undertake operational roads policing enforcement activity, but the COL lead on Road Safety for the City of London. Data is available from initiatives that support Vision Zero (e.g data relating to Casualties (KSIs) etc , 20MPH zone. However, this is an area that may require further development in partnership with the City of London Corporation DBE. A meeting took place with the City's Strategic Transportation Team lead to discuss and these will be monthly moving forward. <p>The deadline has been extended to allow for further progress to be made.</p>
<p>8</p> <p><u>Recommendation</u></p> <p>With immediate effect, chief constables should make sure that their force (or where applicable road safety partnerships of which their force is a member), comply with (the current version of) Department for Transport Circular 1/2007 in relation to the use of speed and red-light cameras.</p>	<p>WHITE</p>	<p>December 2020 [subject to review]</p> <p>New deadline April 2021</p>	<p>The force has reviewed Department of Transport Circular 1/2007 and its requirements and determined that this needs to be considered by the RDR partnership. Compliance with the circular extends beyond the remit of the force and it cannot lead.</p> <p>The City's Strategic Transport Team confirm that all red light and speed cameras [the subject of the above circular] are owned and managed by TfL who have been contacted and a response is pending.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
			[subject for review]	
11	<p><u>Recommendation</u></p> <p>By 1 August 2021, the College of Policing should include a serious collision investigation module for completion along with the Professionalising Investigation Programme. This should include:</p> <ul style="list-style-type: none"> • minimum national training standards; and • certification for all serious collision investigators. <p>Chief constables should make sure that all serious collision investigators in their force are then trained to those standards.</p>	WHITE	August 2021 for the College of Policing	<p>This action is initially for the College of Policing.</p> <p>However, the force will include any College of Policing requirements in its training plans</p>
14	<p><u>Area for Improvement</u></p> <p>Force-level support to national roads policing operations and intelligence structure is an area for improvement.</p>	AMBER	<p>September 2020</p> <p>Extended to January 2021 pending future regional and national meetings taking place]</p>	<p>The responses below are provided within the context of this area for improvement within the HMICFRS report:</p> <p>The force engages in national campaigns.</p> <p>National and Regional level meetings were attended by Inspector [Roads Policing]; future representation will be additionally be at Superintendent level.</p> <p>The force does provide data to the national roads policing operations and intelligence unit.</p> <p>This action is held at amber pending Superintendent level representation at national and regional meetings – none have</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
		<p>Now April 2021 since no future pending future regional and national meetings have been scheduled at this time</p>	<p>been scheduled. This position remains unchanged and the deadline extended to April 2021 [subject to review].</p>
<p>15</p> <p><u>Area for Improvement</u></p> <p>The efficient and effective exchange of all collision data with other relevant bodies is an area for improvement.</p>	<p>RED</p>	<p>September 2020 [subject to review]</p> <p>Now November 2020 [subject to input from CoL]</p> <p>Extended to April 2021 [subject to review]</p>	<p>The responses below are provided within the context of this area for improvement within the HMICFRS report:</p> <p>See above re: information sharing/ analysis of data.</p> <p>The force does use the Crash system to report to DfT and TfL.</p> <p>Progress is linked to 6 above; deadlines have therefore been aligned.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
16	<p><u>Area for Improvement</u></p> <p>The awareness and understanding of the changes in the Professionalising Investigation Programme within police forces is an area for improvement.</p>	AMBER	<p>November 2020 for initial response</p> <p>Now February 2021 to confirm delivery of training</p>	<p>Insp Road Policing has successfully bid through the force Training Improvement Board [November 2020] for an in-house modular Roads Policing Traffic Patrol Course which will be delivered from January 2021 and aligned to ongoing work from the College of Policing.</p> <p>Insp Roads Policing is linked into the National forum on Roads Policing professionalisation to ensure that this new programme mirrors as closely as possible what the National course will look like ensuring it can be easily amended as and when required.</p> <p>A new deadline has been set to confirm delivery of training.</p>

Child Protection – City of London Police

A HMICFRS force report
Published 10th July 2020

There are 6 recommendations for the force, 5 are complete and 1 are in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<p><u>Recommendation</u></p> <p>We recommend that, within three months, City of London Police should review its systems and practice to ensure that:</p>	RED	November 2020	<p><u>Bullet 1</u></p> <p>All incidents attended are checked for intelligence by the Response Intelligence Officer [within Control] who are on Duty 24/7. They will check all systems (including surrounding Forces) for any intelligence</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<ul style="list-style-type: none"> • [1]warning markers and flags are used to alert responders to risk and vulnerability; and • [2]Control room staff have effective systems to help them to prompt frontline responders to follow force policy – for example, to turn on body-worn video cameras when attending domestic abuse incidents. 		Now March 2021	<p>or flags associated with the address or individuals and as standard these would be communicated to the officers attending.</p> <p>These checks would also include specific police databases for violent and sexual offenders.</p> <p><u>Bullet 2</u> New onscreen messaging is being developed within the control system based on the THRIVE + model.</p> <p>The Public Protection Unit is involved to ensure officers are prompted with best practice [including Body worn video, vulnerability and voice of the child]. Comms messaging was broadcast on the Force Intranet to remind all officers to ensure their BWV is turned on when attending any incident.</p> <p>This is still to be delivered.</p> <p>Deadline has been extended to March 2021.</p>

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.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>3</p> <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>	<p>RED</p>	<p>No date set by HMICFRS</p> <p>September 2020 for the review</p> <p>November 2020 to deal with the outcomes of the review</p>	<p>Crime Directorate has conducted a review and a number of actions have been identified to ensure that sufficient guidance and training is available to officers. These are to be progressed including the production of a 'checklist' that can be consistently applied to those juveniles in custody to ensure children are not unnecessary criminalised.</p> <p>A report was consideration at the Vulnerability Steering Group [December 2020], making recommendations that the visits to vulnerable persons (and therefore juveniles) in custody was refreshed and relaunched. It was agreed that this function could now be carried out by the 24/7 City Silver role as they would be routinely available to visit face to face.</p> <p>The deadline has been extended to April 2021 to enable decisions made at Vulnerability Steering Group [December 2020] to be implemented and the production of the checklist above.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
		<p>Now December 2020 to allow for a report to be considered at Vulnerabilit y Steering Group</p> <p>Extended to April 2021 to enabled actions to be embedded</p>	
<p>5</p> <p><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.</p>	RED	<p>No date set by HMICFRS</p> <p>September 2020 for the review</p>	<p>Volumes of juveniles in custody are low and dip sampling rates of their records are high and can be up to 100% of monthly throughput.</p> <p>These custody records are assessed both for PACE and voice of the child. Visits are performed to assess the welfare/experiences of juveniles in custody – enabling first-hand experience of be gained of the juveniles circumstances.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
		<p>November 2020 to deal with the outcomes of the review</p> <p>Extended to December 2020 to allow for a report to be considered at Vulnerability Steering Group</p> <p>Now April 2021 to enable new processes to be embedded</p>	<p>The results of dip samples, together with quarterly figures are reviewed at Custody Management Group. Analysis includes age, gender, ethnicity, and offence type and detention time.</p> <p>Crime Standard Boards also reviews and a new dip sampling/review process starts in January 2021. It will cover different themes from Disclosure, file standards, NICHE compliance – including VCOP, Voice of the Child. This was piloted in Crime Directorate with good results.</p> <p>The deadline has been extended to April 2021 to enable these new processes to be embedded.</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 [Home Office leads on 1].

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>1</p> <p><u>Recommendation</u></p> <p>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. 	<p>WHITE</p>	<p>November 2020</p> <p>Now pending publication of the Mackey Serious and Organised Crime review</p>	<p>Bullets 1 through 4 are in part, of the NPCC lead and were not for the force to progress until August 2020 when the Commissioner became the NPCC lead following the retirement of CC Goodman.</p> <p>To date progress has been held pending the outcome of the independent serious and organised crime review led by Sir Craig Mackey.</p> <p>The Home Office is the lead for this recommendation.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>4</p> <p><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:</p> <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. 	<p>WHITE</p>	<p>No deadline set by HMICFRS</p> <p>November 2020 for an initial position Now pending the publication of the Mackey Serious and Organised Crime review</p>	<p>Bullets 1 and 2 are the remit of the NPCC lead and were not for the force to progress until August 2020 when the Commissioner became the NPCC lead following the retirement of CC Goodman. To date progress has been held pending the outcome of the independent serious and organised crime review led by Sir Craig Mackey.</p> <p>Bullet 3 – the use of the weekly lists [completed]. 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.</p> <p>This guidance will be reviewed upon any future standards set by the NPCC lead for Cyber Crime.</p> <p>The performance indicators referred to within the recommendations were set by the National Board Force Specialist Cyber Capability Project Board.</p> <p>Any future plans with regard to bullet 1 and 2 [NPCC lead] will be handled within business as usual.</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>GREEN</p>	<p>Bullet 1 - The force is compliant recording corruption based on national corruption categories.</p>
		<p>Extended to November 2020 [Subject to Co-vid] Aligned to PEEL 2018/2019 AFI 11</p>	<p>GREEN</p>	<p>Bullet 2 - The force has produced a current force counter corruption Strategic Threat Assessment and control strategy 2020/21. 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>Now April 2021 to confirm the new system is in place and the old contract terminated</p>	<p>AMBER</p>	<p>Bullet 3 - PSD have 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. The mechanism is now in place to deliver this. PSD recently published an article to the business community in Skyline on 6th February 2020 which encouraged companies to get in</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>touch if they had any concerns and explained the work of the CCU. The force regularly attends the SE Regional Counter Corruption Practitioners Group, chairs the SE Regional Analysts meeting and attends other national groups.</p> <p><u>New IT system</u> Previously delayed pending the release of a Microsoft 365 compatible version; testing has been completed by the supplier in 2 forces.</p> <p>Roll out was expected by September 2020, however it is delayed. A new system implementation timeline has been produced and it is due to be completed by the end of February 2021. The CoL/CoLP IT provider has allocated a system architect to support. The contract for the old system will be terminated so that it does not renew after 31.3.21.</p>

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
5	<p><u>Area for Improvement</u> The force should immediately improve its collection and analysis of equality data through its crime reporting and recording systems</p>	AMBER	<p>February 2020</p> <p>Extended to September 2020</p> <p>Now extended to February 2021 to confirm improvements are embedded</p>	<p>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.</p> <p>Disability and sexuality data remain to be collected and analysed.</p> <p>The MINERVA Niche group has also been contacted since most forces have similar issues.</p> <p>Rationale: Deadline further extended to ensure measure already taken are embedded and establish if work-arounds can be established for the collection and analysis of disability and sexuality data.</p>
6	<p><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.</p>	AMBER	<p>February 2020</p> <p>Extended to July 2020 but need to be reviewed [Reported to PAB]</p> <p>Extended to</p>	<p>Audit results have not met the desired standards and further steps are now being taken:</p> <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

Recommendations & Areas for Improvement	Status	Due Date	Comment
		<p>September 2020 to ensure improvements are embedded</p> <p>Extended to March 2021</p>	<ul style="list-style-type: none"> • The force Corporate Communications department will be engaged to support messaging • Digitisation of Cannabis Warnings and PND will be pursued. <p>Initial improvements were observed but not sustained and additional management actions is necessary.</p> <p>Consideration is being given to the implementation of the 2 Tier system. This framework replaces the current six disposal options available: cannabis warning, khat warning, community resolution, and penalty notice for disorder (PND), simple caution and conditional caution.</p> <p>The intention of the changes is to deliver a system that is more transparent to the public, more streamlined for officers and ensured offenders always have conditions attached to the outcome, focusing on rehabilitation and victim reparation.</p> <p>Any agreed transition would require changes to process and training for officers.</p> <p>The deadline has been extended to March 2021 [subject to review] to establish if the 2 Tier system is to be progressed and thereafter an implementation plan [assuming go ahead].</p>

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. 4 recommendations are complete 1 in progress.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>10</p> <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>	<p>AMBER</p>	<p>January 2020</p> <p>Extended to November 2020 [Previously Reported to PAB]</p> <p>Now extended to February 2021 for review</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 was explored</p> <p>With regard to non-economic crime victims: The force undertakes dip samples to identify learning which is then reported to the Crime Standards Board, these dip samples include qualitative checks on the service provided.</p> <p><u>Next Steps</u> 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. Virtual victim journey workshops were to be progressed in October 2020 but have been delayed to allowing for the deployment of new</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>laptops within the force which enable the virtual workshops. The first meeting took place 22nd December 2020.</p> <p>Deadline extended to enables further workshops to be scheduled and conducted.</p>

PEEL 2018/2019

A force report by HMICFRS
Published May 2019

This report makes 11 areas for improvement for the force; 9 complete 2 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>	AMBER	<p>December 2019 set to align with the next inspection anticipated early 2020.</p> <p>Reset to June 2020</p>	<p>The requirement to survey domestic abuse victims is a mandatory home office return. Previously performed by the Vulnerable Victim Advocate [VVA], when funded by MOPAC and the force. In 2019 MOPAC redirected funding away from the City and the force now has access 2.5 days per week to an Independent Domestic Violence Advocate [IDVA] under the Pan London Victim and Witness Scheme. Vetting and recruitment [victim support] delayed the starting of the IDVA. Although the force now has access to an IDVA the Head of Domestic Abuse Services at Victim Support as indicated that surveying falls outside the scope of this role.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
		<p>[Reported to PAB]</p> <p>Extended to November 2020 subject to further review</p> <p>Now April 2021 [subject to review]</p>	<p>This HMICFRS area for improvement seeks Domestic Abuse surveying to be expanded to other vulnerable victims – increasing demand.</p> <p>The way ahead has been discussed with the Corporation and a successful bid for POCA funds to Safer City Partnership [18/9/2020] has been made. The Head of PPU is now in discussion with Victims Support for the expansion of the service.</p> <p>This is not seem as a long term fix and the POCA bid included an element to commission an independent review of the Domestic Abuse/Vulnerable victim service provided across the City to include VVA, MOPAC, IDVA and the services the corporation provide. Domestic abuse surveys are to be conducted by officers of PPU as an interim measure to meet Home Office requirements, but these survey are currently paused during the current lockdown due to increased risks to victims.</p> <p><u>Deadline Rationale</u> A revised deadline of April 2021 is set to review the current position and victim support recruitment.</p>
<p>11</p> <p><u>Area for Improvement</u> The force should ensure that its counter-corruption unit:</p> <ul style="list-style-type: none"> • has enough capability and capacity to counter corruption effectively and proactively; 	<p>AMBER</p>	<p>December 2019 set to align with the next inspection</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>

Recommendations & Areas for Improvement		Status	Due Date	Comment
	<ul style="list-style-type: none"> • can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the force's data and identify computer misuse; and • builds effective relationships with individuals and organisations that support and work with vulnerable people. 		<p>anticipated early 2020.</p> <p>Now November 2020 [Subject to Co-vid]</p> <p>Now April 2021</p>	In terms of the second point: New IT system. - roll out is now expected by February 2021 [see Shining a light on betrayal: Abuse of position for a sexual purpose, 4a above]

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></p> <p>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>	AMBER	<p>September 2019, March 2020</p> <p>Extended to</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 issues with the contractor have prevented a timetable being produced and communicated with Chief Constables.

Recommendations & Areas for Improvement		Status	Due Date	Comment
	The use made of the system by police forces should be monitored and evaluated to identify best practice.		November 2020 [Previously reported to PAB] Now extended to February 2021.	<p><u>Next Steps</u> Further communications to Chief Constables are planned as key decisions are made regarding the way ahead. Next steps were considered at the Police Authority Board 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. Future communication to Chief Constables is planned.</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 20 are complete, 1 is in progress

Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<p><u>Area for Improvement</u> The force should ensure that there is sufficient oversight of how minimum staffing levels are maintained in the custody suite, and the level of overtime in use to achieve these.</p>	AMBER	December 2019 to align with the HMICFRS return visit	<p>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. 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</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
		<p>Now extended to July 2020, subject to review, to align with Transform</p> <p>Now October 2020 to aligned with Transform subject to review</p> <p>Now March 2021</p>	<p>Custody Goalers 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>Reports were presented to Senior Management Board in both November 2020 and Jan 2021 re Transform proposals with the latest key changes reported as the introduction of a dedicated Custody Cadre consisting of 15 Custody Sergeants under the supervision of a dedicated Inspector and the introduction of a management structure more in keeping with the CoLP commitment to a ratio of 1:6 and affords a more accessible level of management between practitioners and senior managers (ie Supt and Chief Insp dedicated to CJS and Custody Services above Custody Manager (Insp)) in addition to re-engineered processes to drive improvements.</p> <p>The intent is for the intermediate custody model to go live aligned to the Local Policing model to ensure continuity of service due to the different implementation dates for Local Policing and Investigations which Custody will transfer between with work ongoing to determine the Intermediate model for Custody.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>It is scheduled that the new Criminal Justice Service/Custody function goes live by June 2021, with responsibility transferring by March 2021.</p> <p>Deadline is now March 2021 for review.</p>
<p>3</p> <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>	<p>NEW GREEN</p>	<p>December 2019 to align with the HMICFRS return visit</p> <p>Extend to November 2020</p>	<p>Van docking arrangements have been formalised.</p> <p>New design guidelines published by Home Office have been fed into the Accommodation Team.</p> <p>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>Facilities works were completed on 2/3rd December (Moved from 24/25th November) and delivered the following:</p> <ul style="list-style-type: none"> • Call buzzer lowered in one cell to allow for improved accessibility for any disabled DP. • Heating and ventilation system checks conducted to ensure operating effectively • Custody Suite deep cleaned • Emergency lighting serviced • Distribution boards checked • Hatching floor markings installed (to help maintain DP privacy at booking in desk)

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>Installation of protective screens has now been linked to delivery of the CCTV project which has a completion date of 14th Feb. These are being installed to offer Custody Officers a degree of protection from attack and also at this time some COVID-19 protection between DP and Custody Officer.</p> <p>Works to build a new exercise yard commenced on 4th January 2021 with an anticipated completion date of 14th February 2021.</p> <p>In addition the Custody Manager has co-ordinated with Custody Trainer such that Refresher training scheduled for delivery in March 2021 will include input on this AFI and others within plan to ensure the DP welfare and experience are adequately delivered and recorded, for example re offering use of washing facilities.</p>
<p>9</p> <p><u>Area for Improvement</u> Staff should routinely consider, and take any appropriate actions to preserve, detainees' privacy at the booking-in desk.</p>	<p>NEW GREEN</p>	<p>December 2019 to align with the HMICFRS return visit</p> <p>Extended to Nov 2020</p>	<p>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.</p> <p>Hatching 'no loitering' area in Reception to be marked up to minimise opportunity to view CCTV monitors.</p> <p>This work was completed on 2/3rd December (moved from 24/25th November). The hatchings installed (indicating where people should and should not stand) now offer a degree of separation between detainees to allow for some degree of privacy and helps prevent detainees from standing next to each other during the booking in process.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
				<p>Following review it has not proved possible to install privacy screening at desk as it was deemed to present a hazard due to space reduction. Similarly moving of CCTV screens was not deemed possible due to space limitations.</p> <p>In addition the Custody Manager has co-ordinated with Custody Trainer such that Refresher training scheduled for delivery in March 2021 will include input on this AFI and others within plan to ensure the Detained Person welfare and experience are adequately delivered and recorded.</p>

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	<p><u>Recommendation</u> By August 2019, all forces should review their existing partnership mental health triage services to assess their effectiveness, and the environment they are operating in. This will help them make decisions about sustainable future services with partners to make sure mental health care needs are being met.</p>	WHITE	August 2019	<p>Practise guideline from the College of Policing to help force benchmark their triage activity are pending.</p> <p>However this is something which the force already undertakes – the most recent assessment examined the period November 2018 to October 2019 and highlighted a business need for mental health nurse cover during the day.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<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>			

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 can now be progressed following publication of the Hate Crime APP by the College of Policing.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p><u>Recommendation</u></p> <p>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 	RED	<p>December 2020</p> <p>Now February 2021</p>	<p>This action has been held at WHITE pending the publication of the College of Policing APP.</p> <p>Following consultation completed November 2019, the College has now published this APP and it is now been considered by the force.</p> <p>A deadline of December 2020 was set for this initial review, but this is now extended to February 2021.</p>

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

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="114 1050 152 1082">3</p> <p data-bbox="208 927 427 954">Recommendation</p> <p data-bbox="208 962 943 1206">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>	WHITE	September 2018 And January 2019	<p data-bbox="1317 802 2107 866">Details of the peer review approach have not been released by the College of Policing at this time.</p> <p data-bbox="1317 911 2130 1294">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>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			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.