

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.

Getting the balance right?

An inspection of how effectively the police deal with protests

A national report HMICFRS
Published 11th March 2021

There are 5 actions for the force, these are currently being considered.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Area for improvement</u> Forces should improve the quality of the protest-related intelligence they provide to the National Police Coordination Centre's Strategic Intelligence and Briefing team. And this team should ensure that its intelligence collection process is fit for purpose.	AMBER	To be set	This report has recently been published and is currently being considered by the force.

Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<p><u>Recommendation</u> By 30 June 2022, the National Police Chiefs' Council (NPCC), through its National Public Order Public Safety Group and National Protest Working Group, should analyse the results from the national development team trial. In the light of this analysis, the NPCC should secure an appropriate longer-term arrangement for managing the risks presented by aggravated activists.</p>	WHITE	June 2022	This action is for the NPCC and its National Public Order Public Safety Group and National Protest Working Group.
3	<p><u>Recommendation</u> With immediate effect, the National Police Chiefs' Council (NPCC), through its National Public Order Public Safety Group and National Protest Working Group, should closely monitor progress on integrating the management of protest-related covert human intelligence sources with the devolved force model. And, by 30 June 2022, the NPCC should ensure that a post-implementation review is conducted.</p>	WHITE	Immediate and June 2022	This action is for the NPCC and its National Public Order Public Safety Group and National Protest Working Group.
4	<p><u>Area for improvement</u> On a national, regional and local basis, the police should develop a stronger rationale for determining the number of commanders, specialist officers and staff needed to police protests.</p>	AMBER	To be set	This report has recently been published and is currently being considered by the force.
5	<p><u>Recommendation</u> By 30 June 2022, the College of Policing, through its planned review, should bring the public order authorised professional practice (APP) up to date and make arrangements to keep it current, with more regular revisions as they become necessary. It would also be beneficial to consolidate the APP, protest operational advice and aide memoire into a single source (or a linked series of documents).</p>	WHITE	June 2022	This action is for the College of Policing
6	<p><u>Area for improvement</u> The police's use of live facial recognition technology is an area for improvement. The National Police Chiefs' Council should continue to work with the Government and other interested parties. These bodies should develop a robust framework that supports forces,</p>	WHITE	To be set	This action is for the NPCC

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>allowing the use of live facial recognition in a way that improves police efficiency and effectiveness while addressing public concerns about the use of such technology. The framework should be designed to help the police satisfy the requirements explained in the Court of Appeal judgment: [2020] EWCA Civ 1058.</p>			
<p>7 <u>Recommendation</u> By 31 December 2021, chief constables should make sure that their legal services teams subscribe to the College of Policing Knowledge Hub’s Association of Police Lawyers group.</p>	AMBER	December 2021	This report has recently been published and is currently being considered by the force.
<p>8 <u>Recommendation</u> By 31 December 2021, the College of Policing should ensure that all Public Order Public Safety commander and adviser students attending its licensed training are enrolled in the College of Policing Knowledge Hub’s Specialist Operational Support – Public Order Public Safety group, before they leave the training event.</p>	WHITE	December 2021	This action is for the College of Policing
<p>9 <u>Recommendation</u> By 31 December 2021, chief constables should ensure that their forces have sufficiently robust governance arrangements in place to secure consistent, effective debrief processes for protest policing. Such arrangements should ensure that:</p> <ul style="list-style-type: none"> • forces give adequate consideration to debriefing all protest-related policing operations; • the extent of any debrief is proportionate to the scale of the operation; • a national post-event learning review form is prepared after every debrief; and • the form is signed off by a gold commander prior to submission to the National Police Coordination Centre. 	AMBER	December 2021	This report has recently been published and is currently being considered by the force.
<p>10 <u>Recommendation</u> By 30 June 2022, on behalf of HM Government, the Home Office should lead a joint review of police and local authority powers</p>	WHITE	June 2022	This action is for the Home Office

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>and practices concerning road closures during protests. This should be done with the support of, and in consultation with, the Department for Transport, the Ministry of Housing, Communities & Local Government, Westminster City Council, the Metropolitan Police, Transport for London and other interested parties. The review should include a comparison of the arrangements in London with those in other parts of England and Wales. Its findings should lead to decisions on whether to:</p> <ul style="list-style-type: none"> • retain, modify or repeal section 52 of the Metropolitan Police Act 1839 and section 21 of the Town Police Clauses Act 1847; and • establish new multi-agency arrangements for implementing road closures in London during protests. 			
<p><u>Recommendation</u> By 30 June 2022, the National Police Chiefs' Council, working with the College of Policing, should provide additional support to gold commanders to improve the quality of gold strategies for protest policing. This support should include:</p> <ul style="list-style-type: none"> • the creation and operation of a quality assurance process; and/or • the provision of more focused continuous professional development. <p>The additional support should ensure that gold commanders for protest operations include an appropriate level of detail within their gold strategies. This may include the levels of disruption or disorder above which enforcement action will be considered.</p>	WHITE	June 2022	This action is for the NPCC working with the College of Policing.
<p><u>Area for improvement</u> The police's protest-related community impact assessments are an area for improvement, particularly those that need to be completed after the event. These assessments should assist the police to understand fully the impact of protests on communities. They should include assessments of the impact of protest on local</p>	AMBER	To be set	This report has recently been published and is currently being considered by the force.

Recommendations & Areas for Improvement	Status	Due Date	Comment
residents, visitors to an area, businesses, and the critical infrastructure including transport networks and hospitals.			
<p>13</p> <p><u>Recommendation</u> By 30 June 2022, the National Police Coordination Centre should revise the national post-event learning review form so that it contains a section to report on the policing operation's impact on the community.</p>	WHITE	June 2022	This action is for the National Police Coordination Centre
<p>14</p> <p><u>Recommendation</u> By 30 June 2021, the Home Office should consider laying before Parliament draft legislation (similar to section 11 of the Public Order Act 1986) that makes provision for an obligation on organisers of public assemblies to give the police written notice in advance of such assemblies.</p>	WHITE	June 2021	This action is for the Home Office
<p>15</p> <p><u>Recommendation</u> By 30 June 2021, the Home Office should consider laying before Parliament draft legislation (similar to section 13 of the Public Order Act 1986) that makes provision for the prohibition of public assemblies.</p>	WHITE	June 2021	This action is for the Home Office
<p>16</p> <p><u>Recommendation</u> By 30 June 2022, the Home Office, working with the National Police Chiefs' Council and other interested parties, should carry out research into the use of fixed penalty notices for breaches of public health regulations in the course of protests. The research should explore the extent to which recipients complied with the scheme, and any consequential demand on the criminal justice system. The outcome of this research should inform a decision on whether to extend either the penalty notices for disorder scheme or the fixed penalty notice scheme to include further offences commonly committed during protests.</p>	WHITE	June 2022	This action is for the Home Office and NPCC

Regional Organised Crime Units - An inspection of the effectiveness of the Regional Organised Crime Units

A national report HMICFRS
Published 10th February 2021

There are no actions for the force, at this time, however the HMICFRS report states “The Metropolitan Police Service, City of London Police and British Transport Police work collaboratively to tackle Serious and Organised Crime, but they do not currently have a ROCU, though this is being considered”.

Should a London ROCU be developed there are implications for the force as a result of the report recommendations.

The following is provided as a current position statement:

Currently, London is without a ROCU and the three forces whilst sitting independently, work collaboratively in a number of areas. With regards to Serious and Organised Crime [SOC], this is becoming more formalised although it has always existed in some way. The introduction of the London Regional and Organised Crime Threat Assessment team [ROCTA] will mean that this one team, comprising of staff from the MPS, BTP and CoLP, will now own the whole Organised Crime Assessment process providing a single capability that will assess and understand the risk from SOC – it will improve the delivery and provide consistency for the three forces of London. The forces have already collaborated in terms of creating a regional control strategy for the ROCTA which has been signed off by the Senior Governance Group. The control strategy is a list of seven priorities which is believed to outline the greatest threats from SOC in London currently. Regional tasking, a key output of this new formalised relationship, whilst not fully devised yet, is currently being scoped with visits to neighbouring ROCUs to identify best practise before being formally implemented.

This collaboration doesn't end with the creation of this unit however – the London Region Intelligence Partnership, which sits monthly, has all three forces as well as partner agencies within its membership and this meeting can help supplement intelligence available to the attendees which will help provide further information and help in our ability to task and coordinate a police response to SOC threats and allow all three forces to be part of the ‘whole system approach’ to tackling SOC as highlighted in the Home Office Strategy published in 2018. Alongside this meeting, is the forces’ membership at the Serious Crime Tasking meeting which is held weekly by the MPS of which a member of the SOC team sits and advises of any significant change in threat picture or capability issues.

Whilst the City is outside of the ROCU network formally, it does rely on the ROCU network particularly in terms of its National Lead Force [NLF] responsibilities. Its parallel tasking process means that forces escalate fraud related investigations to ROCUs and who can in turn supply these investigations, if they are beyond the capacity and

capability of the ROCU to the City through its Lead Force Operations Room for consideration around taking primacy of the investigation. The City, in its NLF capacity, may also extend advice to ROCUs and forces to help them investigate jobs. Designated officers working on Fraud are found within every ROCU and are led by a coordinator within the National Coordinators Office based at CoLP.

The ROCTA will be the only unit with all three forces systems and staff collocated – however there are other units in force with a regional response such as the Cyber Crime Unit which also now has a regional responsibility.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> By March 2021, the Home Office should consider what changes to legislation can be made to allow the NCA to formally task ROCUs.	WHITE	March 2021	This action is for the Home Office.
2	<u>Recommendation</u> By February 2023, the NPCC lead for SOC, with the Home Office, should devise a technical solution to make exchanging sensitive intelligence between organisations more efficient, and then encourage its adoption and adherence by all relevant forces and the NCA.	WHITE	February 2023	This action is for the NPCC lead for Serious and Organised Crime
3	<u>Recommendation</u> By February 2022, chief officers responsible for SOC in each region, with the chief officers of the affected forces, should make sure that systems are in place for SIOs and LROs to work effectively together.	WHITE	February 2022	This action is for Chief Officer with responsibility for SOC in each Region.
4	<u>Recommendation</u> By February 2022, the chief constable with the lead for SOC in each region, with the chief officers of the affected forces, should ensure that a chief officer is appointed with responsibility for each ROCU, as far as practicable working autonomously of force responsibilities.	WHITE	February 2022	This action is for Chief Officer with responsibility for SOC in each Region.

Recommendations & Areas for Improvement		Status	Due Date	Comment
5	<p><u>Recommendation</u> By August 2021, the NPCC lead for ROCUs, with the NPCC lead for counter corruption, should publish an anti-corruption strategy for ROCUs and then encourage its adoption and adherence by all relevant forces.</p>	WHITE	August 2021	This action is for the NPCC lead for ROCUs and NPCC lead for counter corruption.
6	<p><u>Recommendation</u> By February 2022, the NPCC lead for SOC should design a national function that can make sure ROCUs operate in a co-ordinated and consistent way across England and Wales; the Home Office and other relevant interested parties should adopt the arrangements so devised and provide the necessary resources to ensure their successful operation.</p>	WHITE	February 2022	This action is for the NPCC lead for SOC
7	<p><u>Cause of concern</u> We found that the complexity and short-term nature of ROCU funding has a significant detrimental effect on how well they operate. We also found that local interests, rather than regional and national threat, risk and harm, affected prioritisation. Feedback from across the ROCUs, from senior managers to frontline staff, consistently identified funding as their top concern. This was echoed when interviewing national leads. Business leads find it difficult to plan, staff face uncertainty about the tenure of their posts, ROCUs struggle to attract and retain talent based on fixed-term arrangements and they can't invest effectively in specialist capabilities. This is neither effective nor efficient and is a cause of concern.</p> <p><u>Recommendation</u> By February 2022, the Home Office should lead work with the NPCC and the APCC to identify a sustainable funding model for ROCUs that:</p>	WHITE	February 2022	This action is for the Home Office

Recommendations & Areas for Improvement	Status	Due Date	Comment
<ul style="list-style-type: none"> provides long-term clarity and certainty to the funding position of the ROCUs, to allow for future business planning and more financial stability; and enables ROCUs to lead the response to SOC in their region 			

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 and are in progress.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p><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 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>	AMBER	<p>February 2021 for initial review [completed]</p> <p>June 2021 for the revision</p>	<p>Following initial consideration of the report recommendation it has been determined that the force Domestic Abuse SOP needs to be revised to offer specific guidance.</p> <p>A deadline of June 2021 has been set for the Domestic Abuse SOP to be revised, signed off and published.</p>

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>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. 		and publication of force SOP	
<p><u>Recommendation</u> 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 style="list-style-type: none"> ensure there is a proper policy and practice framework in place for officers to work within; 	AMBER	<p>February 2021 for initial review [completed]</p> <p>July 2021 for the review of</p>	<p>Following initial review of the report recommendation it has been determined that completion of this action is, in part dependant upon the Home Office and NPCC to develop a safeguarding protocol [recommendation 3].</p> <p>Currently there is no timeline for deliver by the Home Office and NPCC and the force maintains a watching brief.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<ul style="list-style-type: none"> • develop victim and witness support policies that reflect the characteristics of the safeguarding protocol set out in recommendation 3, and: • draw on all relevant national guidance with particular reference to the Code of Practice for Victims of Crime and data protection legislation; • are developed in partnership with and include pathways to the relevant specialist organisations for supporting victims and witnesses with insecure immigration status; • are clear about the circumstances in which information will be shared by police with immigration enforcement; • provide clarity about the purpose of sharing information at different points of the pathway; and • 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. • promote understanding among police officers and staff to differentiate between responses to victims of modern slavery/human trafficking and victims of domestic abuse; • 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>relevant forces SOPs although compliance with this recommendation is dependant upon delivery of recommendation 3 by the Home Office and NPCC</p>	<p>In the meantime, force SOPs are to be reviewed to ensure adequate guidance and signposting.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
5	<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>	WHITE	February 2021 for initial review [completed]	Delivery of this recommendation is heavy dependant upon outcomes from other report recommendations which are yet to be completed by partners. However review of force SOPs will be undertaken
8	<p><u>Recommendation</u> To all recipients of recommendations from this investigation 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>	AMBER	June 2021	Strategic Development report the progress of all open actions to our HMICFRS Force Liaison Lead. Action plans for new reports are also to be produced in consultation with the HMICFRS FLL.

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.

Recommendations & Areas for Improvement		Status	Due Date	Comment
8	<p><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.</p>	AMBER	<p>March 2021 [completed]</p> <p>June 2021 for a report to CSB</p>	<p>Following initial review, a report is to be produced for June 2021 Crime Standards Board – this will document existing practises and safeguarding identifying any additional measures that have been put in place to address apparent gaps. It is anticipated this will be a joint [Custody Manager, Crime DCI] report.</p>
9	<p><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.</p>	WHITE	<p>March 2021 for initial review [completed]</p>	<p>The current position has been identified.</p> <p>The MG3 is embedded in the Niche system and a revised form is anticipated from the regional Niche group. Consultations conducted by region were to have concluded in February 2021, but the force is aware that this has slipped.</p> <p>At this time no timeline for delivery has been established by the Niche regional group and the force remains in contact.</p>

Roads Policing – Not Optional

A National report HMICFRS

Published 15th July 2020

There are 10 recommendations for the force, 4 are completed, 1 closed [not applicable] and 5 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>AMBER</p>	<p>September 2020 for an initial position</p> <p>November 2020 for review and reinstatement of the RDR Partnership by the CoL</p> <p>Deadline now April 2021 [subject to review]</p>	<p><u>[bullet 1] analytical capability</u></p> <p>Sustained analytical support has been an issue for the Roads Policing unit previously. The Force Intelligence Unit, who provide this support is aware of the issue and intends to produce a dashboard on a quarterly basis. The next quarterly dashboard [post January 2021] will be produced, although the data to support it will be lower in volume - reduced due to the impact of Co-vid on traffic in the City.</p> <p>The City of London partners have no analytical capability.</p> <p>The Road Danger Reduction [RDR] Partnership meetings, lead by the City of London Corporation, have been suspended until early 2021. A meeting took place on the 11th January 2021, to set out expectations. No analysis reports were submitted.</p> <p><u>[bullet 2] Information shared</u></p> <p>Dashboards produced will be shared.</p> <p>A RDR partnership meeting has been scheduled by the CoL [13th April 2021] and the Force Intelligence Bureau has produced a 6 monthly report for the meeting.</p> <p><u>[bullet 3] evaluation of road safety initiatives</u></p> <p>This area requires development in partnership with the City of London. A meeting took place with the City's Strategic</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>Transportation Team lead to discuss and these will be monthly moving forward.</p> <p>However, the expectation is very much that City of London Police provide the analysis for the City of London to use.</p> <p>This issue needs to be considered by the RDR partnership.</p> <p>At this time only City of London Police officers are undertaking operational RDR initiatives – evaluation of this initiative are yet to be evaluated by the partnership meetings.</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 [subject for review]</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 of London 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> <p>This action is held at WHITE pending a response from TfL – a new deadline has been set for review</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
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>	WHITE	<p>September 2020</p> <p>Extended to January 2021 pending future regional and national meetings taking place]</p> <p>Now April 2021 since no</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 white pending Superintendent level representation at national and regional meetings – none have been scheduled. This position remains unchanged and the</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
			future pending future regional and national meetings have been scheduled at this time	deadline extended to April 2021 [to establish if national/regional meeting have resumed]
15	<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>	AMBER	<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>Data collation and analysis, evaluation and effectiveness of the Road Danger Reduction partnership need to be better – the restoration of RDR partnership meetings [11/1/2021] will assist together consideration of analysis reports at the meetings.</p> <p>The force has an analysis report for presentation to the 13th April 2021 RDR partnership meeting.</p> <p>The force does use the Crash system to report to DfT and TfL, although with the caveat of data accuracy.</p> <p>Progress is linked to 6 above; deadlines have therefore been aligned.</p>
16	<p><u>Area for Improvement</u></p>	NEW GREEN	November	Insp Road Policing has successfully bid through Training Improvement Board [November 2020] for an in-house modular Roads Policing Traffic Patrol Course which commenced delivery

Recommendations & Areas for Improvement		Status	Due Date	Comment
	The awareness and understanding of the changes in the Professionalising Investigation Programme within police forces is an area for improvement.		2020 for initial response Now February 2021 to confirm delivery of training	January 2021 and is aligned to ongoing work from the College of Policing. The force will develop further training plans as further details from the College of Policing are made available.

Child Protection – City of London Police

A HMICFRS force report
Published 10th July 2020

There are 6 recommendations for the force all complete.

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> <ul style="list-style-type: none"> [1]warning markers and flags are used to alert responders to risk and vulnerability; and 	NEW GREEN	November 2020 Now March 2021	<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"> [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. 			<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>Additionally, special schemes have been included on the force control system to highlight Child Protection Plans, VISOR nominals [violent / sexual offenders]. This has been supported by the provision of prompts sheets for use by control staff and a PowerPoint briefing document and a link to the force vulnerability booklet.</p> <p><u>Bullet 2</u> New onscreen messaging has been developed within the control system based on the THRIVE + model.</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 completed 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>NEW GREEN</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>Now December</p>	<p><u>Initial contact/assessment of risk of children/YP coming to notice & consideration of the child's/YP circumstances</u></p> <p>The force operates a number of safeguarding practises that reduce the likelihood of unnecessarily criminalising children.</p> <p>City Silver visits to all vulnerable detainees in custody</p> <p>The completion of PPNs that are reviewed by PPU supervisors and follow-up at DCM</p> <p>Additional steps include - Enhanced monitoring arrangements of PPNs [VSG and CSB].</p> <p>The production of a pre-arrest/warrant safeguarding checklist</p> <p><u>Decision maker awareness and guidance for officers when dealing with children/YP for offences</u></p> <p>A training package has been developed for force Evidential Review Officers – delivery commenced January 2021. The training includes the NPCC National Strategy for Charging and Out of Court Disposals for juveniles.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
		<p>2020 to allow for a report to be considered at Vulnerability Steering Group</p> <p>Extended to April 2021 to enable actions to be embedded</p>	<p>The force intranet include dedicated guidance for vulnerable people [including children] in Custody.</p> <p>Additional steps include - The Custody Manager is linking in with PPU to enhance messaging within Custody [new display screens]. Further mandatory vulnerability training is to rolled out across the force.</p> <p><u>The monitoring and analysis of outcomes for children/YP who come into custody</u></p> <p>A monitoring process is in place for Children coming in Custody – reported to VWG, CSB and shared with the CoL.</p> <p>Most children are released under investigation. First offences are referred to the YOT who direct the outcome</p> <p>Additional steps include - All outcomes/disposals will be reviewed to check each child has been afforded the very best opportunity to avoid the unnecessary criminalisation.</p> <p>The Custody manager will review all custody records relating to children to manage performance and compliance.</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>	<p>NEW GREEN</p>	<p>No date set by HMICFRS</p> <p>September 2020 for the review</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</p>	

Recommendations & Areas for Improvement	Status	Due Date	Comment
		to be embedded	

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> 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. 	WHITE	<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 and are complete.

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>NEW GREEN</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>Now April 2021 to confirm the new system is in place and the old contract terminated</p>	<p>NEW GREEN</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> This was install in March 2021, with full rollout completed during April 2021.</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>	RED	<p>February 2020 Extended to September 2020</p>	<p>Age and gender have already been recognised within the HMICFRS report as being collected. The force is currently conducting a benchmark exercise with other forces to establish</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
		<p>Extended to February 2021</p> <p>Now June 2021 pending the results of benchmarking</p>	<p>if disability, religion and sexuality are recorded on crime reports? If so, what system they are you using to record it and how they use the data.</p> <p>The results of this benchmark will inform the force decision as to how to proceed.</p> <p>Strategic Development are aware that there are operational concerns that the process of collecting equality data may alienate victims reporting their crimes.</p>
<p>6</p> <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>	RED	<p>February 2020</p> <p>Extended to July 2020 but need to be reviewed [Reported to PAB]</p> <p>Extended to September 2020 to ensure improve</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 • The force Corporate Communications department will be engaged to support messaging • Digitisation of Cannabis Warnings and PND will be pursued.

Recommendations & Areas for Improvement	Status	Due Date	Comment
		<p>nts are embedded</p> <p>Extended to July 2021</p>	<p>Initial improvements were observed but not sustained and additional management actions is necessary.</p> <p>Consideration was being given to the implementation of the 2 Tier process, however the Ministry of Justice is instigating it own [formal] plans in this area – this is unlikely to achieve royal assent until the end of 2021</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 July 2021 [subject to review] to establish if the Ministry of Justice plans are progressing and to determine if management action has improved existing practises.</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 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>	RED	<p>January 2020</p> <p>Extended to November 2020 [Previously Reported to PAB]</p> <p>extended to February 2021 for review</p> <p>Now July 2021 pending appointment of a force Victim Champion</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>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.</p> <p>This element was being progressed by the force Victim Champion via Virtual victim journey workshops. However progress has stalled with the secondment of the victim champion to another role.</p> <p>Under Transform the need for a champion has been recognised to work within the Force Resolution Centre. Recruitment for this role will commence following internal signoff.</p> <p>This position is unlikely to be filled before July 2021 – the deadline is extended accordingly, in the meantime a senior officer has volunteered to progress in addition to their existing duties.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment

PEEL 2018/2019

A force report by HMICFRS
Published May 2019

This report makes 11 areas for improvement for the force; 10 complete 1 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>	RED	<p>December 2019 set to align with the next inspection anticipated early 2020.</p> <p>Reset to June 2020 [Reported to PAB]</p> <p>Extended to</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 stated that surveying falls outside the scope of this role.</p> <p>This HMICFRS area for improvement seeks Domestic Abuse surveying to be expanded to other vulnerable victims – increasing demand.</p>

	Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>November 2020 subject to review</p> <p>Extended to April 2021 [subject to review]</p> <p>Now July 2021</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 has agreed an expansion of the service with victim support, who recruited a new VVA but they failed to start in April 2021. Victim support are re-advertising.</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. A report is expected to be available for the June 2021 Vulnerability Working Group.</p> <p><u>Deadline Rationale</u> A revised deadline of July 2021 is set to review the current position for the recruitment of the VVA by victim support and to receive the independent report.</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 	<p>NEW GREEN</p>	<p>December 2019 set to align with the next inspection anticipated early 2020.</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: New IT system. – this was install March 2021 with full rollout during April 20201 [see Shining a light on betrayal: Abuse of position for a sexual purpose, 4a above]</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
	<ul style="list-style-type: none"> • builds effective relationships with individuals and organisations that support and work with vulnerable people. 		Now November 2020 [Subject to Co-vid] Now April 2021	

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 closed.

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>	CLOSED	September 2019, March 2020 Extended to November 2020	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
		<p>[Previously reported to PAB]</p> <p>Now extended to January 2021.</p>	<p>This action has been closed since these enhancements [Know Fraud] have not been delivered; however reference has been made to the Next-Gen Board to ensure there is appropriate communication with forces.</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 which are complete.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>2</p> <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>	<p>NEW GREEN</p>	<p>December 2019 to align with the HMICFRS return visit</p> <p>Now extended to July 2020, subject to</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</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
		<p>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 SMB 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 (i.e. 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
			It is scheduled that the new CJS/Custody function goes live by June 2021, with responsibility transferring by March 2021.

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
<p>3</p> <p><u>Recommendation</u> By August 2019, all forces should review their existing partnership mental health triage services to assess their effectiveness, and the environment they are operating in. This will help them make decisions about sustainable future services with partners to make sure mental health care needs are being met. If forces find any deficiencies in their triage services, they should take steps to address them as soon as reasonably practicable. The College of Policing has agreed to devise some practice guidelines to help forces benchmark their triage activity. We will inspect on progress in this area as part of our integrated PEEL assessments inspection framework.</p>	WHITE	August 2019	<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>

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>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>RED</p>	<p>December 2020</p> <p>Then February 2021</p> <p>Now June 2021 to enable Sector Policing to embed changes from Transform implementation</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 [late 2020] and it is now been considered by the force however this has coincided with the transfer of responsibilities for Hate Crime and the implementation of Transform.</p> <p>The following actions have been developed:</p> <ol style="list-style-type: none"> 1) PPU will review the current SOP to include the new links to APP and the need to follow the minimum standard of response 2) Sector Policing will then take ownership of the SOP and are going to make the required changes relating to the governance (SRO, deputies etc, and how feeds in to VWG/VSG. PPU [DI] will remain investigation lead. 3) T/DCI Crime will incorporate Hate Crime in to the Dip Sampling schedule. Showing internal scrutiny 4) Once the additional VVA post is in place [commencing shortly] – the independent survey of victims of hate crime 5) External scrutiny, Sector Policing ensure arrangement are in place via the IASG.

Recommendations & Areas for Improvement	Status	Due Date	Comment
			The deadline has been reset to June 2021 to enable Sector Policing to embed necessary changes

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>3</p> <p>Recommendation The College of Policing, working with the NPCC leads, should develop an approach to peer review. This approach should support forces to work with each other to improve how they identify, respond to and keep safe vulnerable victims. The infrastructure to support peer reviews should be in place by September 2018 with the first reviews taking place by January 2019.</p>	WHITE	September 2018 And January 2019	<p>Details of the peer review approach have not been released by the College of Policing at this time.</p> <p>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.