

## HMICFRS Report Recommendations

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

## A review of 'Fraud: Time to choose'

A national report HMICFRS  
Published 5<sup>th</sup> August 2021

There are 3 new actions for the force.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> By 30 September 2021, chief constables should make sure that their forces are following the guidance issued by the National Police Chiefs' Council Coordinator for Economic Crime about fraud-related calls for service.	<b>AMBER</b>	September 2021	This is a new report recently published that is currently being considered by the force.
2	<u>Recommendation</u> By 31 March 2022, the National Police Chiefs' Council Coordinator for Economic Crime with the National Crime Agency, National Economic Crime Centre and City of London	<b>AMBER</b>	March 2022	This is a new report recently published that is currently being considered by the force.

Recommendations & Areas for Improvement	Status	Due Date	Comment
Police should set up an effective national tasking and co-ordination process for fraud.			
<p>3</p> <p><u>Recommendation</u> By 31 October 2021, chief constables should adopt the guidance issued in September 2019 by the National Police Chiefs' Council Coordinator for Economic Crime that was aimed at improving the information given to victims when reporting fraud</p>	AMBER	October 2021	This is a new report recently published that is currently being considered by the force.

## State of Policing: The Annual Assessment of Policing in England and Wales 2020

Published 21<sup>st</sup> July 2021.

There are no actions for the force.

## A joint thematic inspection of the police and Crown Prosecution Service's response to rape

A national joint thematic HMICFRS and HMCPSi

Published 16<sup>th</sup> July 2021.

There are 7 actions for the force to consider, 1 is complete, 1 closed and 5 are in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><u>Recommendation</u> Immediately, police forces should ensure information on the protected characteristics of rape victims is accurately and consistently recorded.</p>	CLOSED	August 2021	<p>This action is linked to recommendation 5 Crime Data Integrity inspection 2019 below.</p> <p>There are operational concerns that the process of collecting equality data may alienate victims reporting their crimes.</p> <p>A decision and the following actions implemented:</p> <ul style="list-style-type: none"> <li>Continue to record ethnicity, age and gender for victims of crime (we currently capture these well as part of crime recording).</li> <li>Record religion and sexuality if directly related to the crime type (ie aggravated/motivated hate crime).</li> <li>Improve the recording of disability data.</li> </ul>
2	<p><u>Recommendation</u> Police forces and support services should work together at a local level to better understand each other's roles. A co-ordinated approach will help make sure that all available and bespoke wrap-around support is offered to the victim throughout every stage of the case. The input of victims and their experiences should play a central role in shaping the support offered.</p>	NEW GREEN	August 2021	<p>COLP work closely with support agencies (statutory and third sector) through the VAWG forum and are aware of roles and support on offer. COLP commission the Vulnerable Victim Advocate who is a trained ISVA to support rape victims and signpost to other bespoke services where needed.</p>
3	<p><u>Recommendation</u> Police forces should collect data to record the different stages when, and reasons why, a victim may withdraw support for a case. The Home Office should review the available outcome codes so that the data gathered can help target necessary remedial action and improve victim care</p>	AMBER	December 2021 for review	<p>Reasons why rape victims fail to support is recorded on Niche OEL and via outcome codes. Procedure for recording victims wishes on statement/other police records or Body Worn Video where able is within the force SOP.</p> <p>This will need to be considered as part of Force Crime and incident Registrar audit, as yet not timetabled.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
4	<p><u>Recommendation</u> Immediately, police forces and CPS Areas should work together at a local level to prioritise action to improve the effectiveness of case strategies and action plans, with rigorous target and review dates and a clear escalation and performance management process. The NPCC lead for adult sexual offences and the CPS lead should provide a national framework to help embed this activity</p>	AMBER	December 2021 for review	<p>Local CPS Rape and Serious Sexual Offences [RASSO] meetings are being arranged at DI and DSU level.</p> <p>A MOU for Early Advice [CPS/CoLP] has been drafted pending consultation and signoff.</p>
5	<p><u>Recommendation</u> Police forces and the CPS should work together at a local level to introduce appropriate ways to build a cohesive and seamless approach. This should improve relationships, communication and understanding of the roles of each organisation.</p> <p>As a minimum, the following should be included:</p> <ul style="list-style-type: none"> <li>• considering early investigative advice in every case and recording reasons for not seeking it;</li> <li>• the investigator and the reviewing prosecutor including their direct telephone</li> <li>• and email contact details in all written communication;</li> <li>• in cases referred to the CPS, a face-to-face meeting (virtual or in person) between the investigator and prosecutor before deciding to take no further action; and</li> <li>• a clear escalation pathway available to both the police and the CPS in cases where the parties don't agree with decisions, subject to regular reviews to check effectiveness, and local results.</li> </ul>	AMBER	December 2021 for review	<p>This is included in the Early Advice MOU which has been drafted pending consultation and signoff.</p> <p>Public Protection Unit supervisors are to include rationale re Early Advice on reviews. This is to be included in Rape SOP.</p> <p>Next steps:</p> <ul style="list-style-type: none"> <li>• Early advice MOU signoff</li> <li>• Update Rape SOP.</li> </ul>
6	<p><u>Recommendation</u> The police and the CPS, in consultation with commissioned and non-commissioned services and advocates, and victims, should review the current process for communicating to victims the fact that a decision to take no further action has been made. They</p>	AMBER	December 2021	No update at present.

Recommendations & Areas for Improvement	Status	Due Date	Comment
should implement any changes needed so that these difficult messages are conveyed in a timely way that best suits the victims' needs.			
7 <u>Recommendation</u> Police forces should ensure investigators understand that victims are entitled to have police decisions not to charge reviewed under the Victims' Right to Review scheme and should periodically review levels of take-up.	AMBER	December 2021	This is communicated as part of final contact with victim.  Force SOP to be updated to ensure this is recorded on the Niche system.
8 <u>Recommendation</u> The National Criminal Justice Board should review the existing statutory governance arrangements for rape and instigate swift reform, taking into account the findings from this report and from the Government Rape Review. The recent appointment of the Minister for Crime and Policing to lead the implementation of the Rape Review should make sure that there is sustained oversight and accountability throughout the whole criminal justice system, sufficient resourcing for the capacity and capability required, and improved outcomes for victims. To support this, a clear oversight framework, escalation processes and scrutiny need to be in place immediately.	WHITE	No date set by HMICFRS	This action is for the National Criminal Justice Board
9 <u>Recommendation</u> Immediately, the CPS should review and update the information on the policy for prosecuting cases of rape that is available to the public. The information provided about how the CPS deals with cases of rape must be accurate. Victims and those who support them must be able to rely on the information provided to inform their decisions.	WHITE	No date set by HMICFRS	This action is for the CPS
10 <u>Recommendation</u> Immediately, the College of Policing and the NPCC lead for adult sexual offences should review the 2010 ACPO guidance on the investigation of rape in consultation with the CPS. The information contained in available guidance must be current to	WHITE	No date set by HMICFRS	This action is for the College of Policing and NPCC lead for adult sexual offences

Recommendations & Areas for Improvement	Status	Due Date	Comment
inform effective investigations of rape and provide the best service to victims.			
<p>11</p> <p><u>Recommendation</u> The Home Office should undertake an urgent review of the role of the detective constable. This should identify appropriate incentives, career progression and support for police officer and police staff investigators to encourage this career path. It should include specific recommendations to ensure there is adequate capacity and capability in every force to investigate rape cases thoroughly and effectively.</p>	<p><b>WHITE</b></p>	<p>No date set by HMICFRS</p>	<p>This action is for the Home Office</p>
<p>12</p> <p><u>Recommendation</u> The College of Policing and NPCC lead for adult sexual offences should work together to review the current training on rape, including the Specialist Sexual Assault Investigators Development Programme (SSAIDP), to make sure that there is appropriate training available to build capability and expertise. This should promote continuous professional development and provide investigators with the right skills and knowledge to deal with reports of rape. Forces should then publish annual SSAIDP attendance figures, and information on their numbers of current qualified RASSO investigators.</p>	<p><b>WHITE</b></p>	<p>No date set by HMICFRS</p>	<p>This action is for the College of Policing and NPCC lead for adult sexual offences</p>
<p>13</p> <p><u>Recommendation</u> The College of Policing, NPCC lead for adult sexual offences and the CPS should prioritise action to provide joint training for the police and the CPS on the impact of trauma on victims, to promote improved decision-making and victim care</p>	<p><b>WHITE</b></p>	<p>No date set by HMICFRS</p>	<p>This action is for the College of Policing and NPCC lead for adult sexual offences</p>

# Interim report Inspection into how effectively the police engage with women and girls

A national thematic HMICFRS report

Published 7<sup>th</sup> July 2021.

This report makes a number of recommendations which include are sub divided into short, medium and other expectations/actions – these are replicated in full for completeness

There are 3 recommendations but these are either not for the force or replicate an action already progressed within the Crime Data Integrity inspection 2019 [Rec 5] action plan below.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>1</p> <p><u>Recommendation</u> There should be an immediate and unequivocal commitment that the response to VAWG offences is an absolute priority for government, policing, the criminal justice system, and public-sector partnerships. This needs to be supported at a minimum by a relentless focus on these crimes; mandated responsibilities; and sufficient funding so that all partner agencies can work effectively as part of a whole-system approach to reduce and prevent the harms these offences are causing.</p> <p><u>Short-term</u></p> <ul style="list-style-type: none"> <li>• The Home Office should add the policing of VAWG to the SPR. This will give a clear signal that the government sees VAWG as a priority and that sufficient capabilities are in place to tackle it. It would also help chief constables and police and crime commissioners (PCCs) to balance national and local priorities.</li> <li>• The Home Office should make sure that VAWG is a priority for the ministerially chaired crime and policing performance board. It should introduce a new Home Secretary-led board to provide clear governance for the VAWG strategy and for the urgent improvements needed.</li> </ul>	<p><b>WHITE</b></p>	<p>Not set by HMICFRS</p>	<p>This action is for the Home Office, other Government departments, NPCC, College of Policing and the Home Secretary</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p><u>Medium Term</u></p> <ul style="list-style-type: none"> <li>• The Home Office and other government departments should consider proposing a statutory duty on all appropriate partner agencies to collectively take action to prevent the harm caused by VAWG.</li> <li>• In doing this, consideration should be given to whether this could be included in any existing duties and how those for safeguarding children will interact and complement the changes.</li> <li>• The Home Office should agree with other government departments the measures and actions that each partner agency needs to implement both at a national and local level to encourage joint responsibility in tackling VAWG. This may need a new statutory framework.</li> <li>• The National Police Chiefs' Council (NPCC) and the Home Office should jointly appoint a full-time national policing coordinator to lead on all police activity related to VAWG. The lead should act as a point of contact for each police force, work closely with the College of Policing to make sure best practice is identified and communicated, ensure progress is monitored, act as the 'voice of policing' at cross-sector national discussions, and regularly report to the Home Secretary.</li> <li>• The Home Office and other government departments should agree sustained, multi-year funding to support collaboration between agencies, where they have joint responsibilities.</li> <li>• The College of Policing and the NPCC should establish mechanisms and processes to allow rapid and consistent sharing of evidence, information and evaluation on new and effective ways of working in response to VAWG offences, and methods that improve VAWG investigation. This should include input from partner agencies and assess specific actions or skills which could</li> </ul>			

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>be used to develop a minimum standard for VAWG crimes, to improve the consistency and quality of outcomes for victims.</p> <ul style="list-style-type: none"> <li>• If this minimum standard is established (and depending on whether and how other agencies need to act), the Home Secretary should consider whether it is appropriate to use her power under section 53A of the Police Act 1996 to require police forces to adopt the procedures and practices it sets out.</li> <li>• As per the recommendation in the government’s 2021 report ‘The end-to-end rape review report on findings and actions’, the Home Office should implement a ‘score card’ for measuring improvements in performance in the criminal justice system for all crimes that disproportionately affect women and girls. This should be developed with input from victim representatives.</li> </ul>			
<p>2</p> <p><u>Recommendation</u> The relentless pursuit and disruption of adult perpetrators should be a national priority for the police, and their capability and capacity to do this should be enhanced.</p> <ul style="list-style-type: none"> <li>• The Home Office and the NPCC should review police capability and capacity to relentlessly pursue and disrupt the perpetrators of VAWG offences and enhance these, as necessary.</li> <li>• The NPCC and the Home Office should review whether the ‘4Ps’ approach used for counter-terrorism and serious and organised crime should be adopted for policing VAWG.</li> <li>• The Home Office should carry out an urgent review of the role of the detective constable. This should establish appropriate incentives, progression and support for both officer and staff investigators to encourage this career path. It should include specific recommendations to make sure there is adequate capacity and capability in every force to thoroughly and effectively investigate VAWG offences.</li> </ul>	<p><b>WHITE</b></p>	<p>Not set by HMICFRS</p>	<p>This action is for the Home Office, NPCC and Ministry of Justice</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<ul style="list-style-type: none"> <li>The Home Office, together with the Ministry of Justice, should improve the evidence it has about perpetrators. This includes considering how to consistently evaluate the effectiveness of perpetrator programmes and use models to plot a perpetrator's progress through the system more effectively.</li> </ul>			
<p>3</p> <p><u>Recommendation</u> Structures and funding should be put in place to make sure victims receive tailored and consistent support.</p> <ul style="list-style-type: none"> <li>[1]The Home Office and other government departments should provide funding so that an independent advisor/advocate is available to support victims of domestic abuse and sexual violence as they go through the criminal justice system (and should consider this for victims of other crimes that disproportionately affect women). This support should be designed in consultation with the victim and should continue after a perpetrator is released from prison.</li> <li>[2]All police forces should ensure information on the protected characteristics of victims is accurately and consistently recorded.</li> <li>[3]The Home Office and the NPCC should introduce a single national survey to measure victim satisfaction. This should allow for both local and national quality assurance, as well as the identification of any emerging issues, risks or variables that need further action to resolve. Police forces and partner agencies should have clear responsibilities in supporting victims through every stage of the case. The victim's voice should play a central role in shaping this, and their individual needs should be understood and addressed throughout.</li> </ul>	<p><b>WHITE</b></p>	<p>Not set by HMICFRS</p>	<p>This bullets 1 and 3 are for the Home Office, other government departments and the NPCC</p> <p>With regard to bullet 2 – this replicates an existing recommendation within the Crime Data Integrity inspection 2019 [rec 5] action plan below.</p>

## Review of policing domestic abuse during the pandemic

A national thematic HMICFRS report

Published 23<sup>rd</sup> June 2021.

There are 3 recommendations for the force, 2 are complete and 1 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>We recommend that if forces continue to adopt online contact methods in respect of victims of domestic abuse, they should immediately introduce an effective supervision and monitoring framework. The framework should assess the suitability of such contact methods, ensuring that victim needs are at the forefront of decisions around their use and appropriate onward action is taken in all cases.</li> <li>We recommend that forces <b>immediately</b> review their use of a telephone-based initial response to any domestic abuse incidents and crimes and ensure that it is in accordance with the strict parameters set out by the College of Policing.</li> </ul>	NEW GREEN	July 2021	<p>COLP do not utilise telephone contacts as the initial response to domestic abuse and do not intend to do so moving forward. This was not done during the pandemic.</p> <p>COLP has no plans to adopt online contact methods for victims of domestic abuse. Due to our low level of resident victims, this was considered for current victims but risk assessed in each case.</p>
2	<p><u>Recommendation</u></p> <p>We recommend that forces immediately review their capacity to provide ongoing support and safeguarding to victims of domestic abuse whose case is awaiting trial at court. This should:</p> <ul style="list-style-type: none"> <li>ensure there are sufficient resources available to maintain contact with victims to keep them up to date with the progress of their case; and</li> </ul>	NEW GREEN	July 2021	<p>All domestic abuse cases are investigated by the Public Protection Unit who maintain the case from report to court. There are no capacity issues in relation to continuing to provide support to those victims awaiting trial and keeping them updated. PPU will ensure cases awaiting trial are kept 'open' on Niche to ensure they required the monthly VCOP update.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<ul style="list-style-type: none"> <li>enable the offer of access to specialist support services as well as opportunities to address concerns victims may have regarding continuing to support a prosecution through the delays.</li> </ul>			<p>Additionally all victims are offered the specialist support through the Vulnerable Victim Advocate (IDVA) who will support from report to court. This offer can be taken up at any point in the investigation.</p>
<p>3</p> <p><u>Recommendation</u> We recommend that all forces immediately review their use of outcome 15, outcome 16 and evidence-led prosecutions. This is to ensure that:</p> <ul style="list-style-type: none"> <li>domestic abuse investigations guarantee all attempts to engage victims are explored, and that all possible lines of evidence are considered so that in all cases the best possible outcomes for victims are achieved;</li> <li>there is regular and effective supervision of investigations that supports the above point to be achieved; and</li> <li>the use of outcomes 15 and 16 is appropriate, and the reasons for using them, including auditable evidence of victim engagement, are clearly recorded.</li> </ul>	RED	<p>August 2021</p> <p>Now December 2021</p>	<p>An audit of outcome 16 cases has been undertaken finding entries on investigation strategy by the PPU are clear regarding the direction of the investigation and supervision. The report did find some learning and these are to be taken forward.</p> <p>This is part of a rolling programme of dip sampling which already covers whether victim engages, how this is recorded and opportunities for evidence-led prosecutions.</p> <p>SOP states that all Domestic Abuse cases should be considered for evidence-led prosecutions and PPU supervisors should explicitly reference opportunities in their reviews. This includes reference to victim engagement (or lack of)</p> <p>Any Domestic Abuse closed under either outcome is passed through the DI PPU prior to closure to ensure all lines of enquiry have been pursued. This is clearly referenced in the DA SOP.</p> <p>COLP continue to seek the retraction template to ascertain if this is something that could be introduced in the COL – this template is proving difficult to obtain.</p> <p>As above DI reviews all cases closed under this outcome code to ensure suitability .</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>Next steps: The deadline is extended to try and obtain the retraction template.</p>

## The Hidden Victims - Report on Hestia's super-complaint on the police response to victims of modern slavery

A joint investigation report HMICFRS, College of Policing and IPOC  
Published 26<sup>th</sup> May 2021

There are 3 actions for the force, these are currently in progress.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>1</p> <p><u>Recommendation</u></p> <p><u>To the Home Office</u></p> <p>a. In consultation with chief constables, the Independent Anti-Slavery Commissioner, Victims Commissioners, the Crown Prosecution Service, voluntary agencies that provide support to victims, and others as appropriate, commission work to:</p> <p>i) better understand the victim experience of the police response to modern slavery and the wider response from immigration and other law enforcement agencies; and</p>	<b>WHITE</b>	No date set by HMICFRS	This action is for the Home Office

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>ii) assess the extent and nature of poor victim experiences (from first contact with the police, through to investigation and prosecution stages where these occur) to understand and identify how they can be improved.</p> <p>b. The work commissioned should seek to result in recommendations for specific actions that will further improve victims' experiences. The Home Office should publish the findings of this work.</p>			
<p>2</p> <p><u>Recommendation</u></p> <p><u>To chief constables</u></p> <p>Assure themselves that police officers and staff (including non-specialist staff, as appropriate) are supported through access to learning, specialist policing resources and victim support arrangements, so that officers and staff are able to:</p> <p>a) easily access information and advice on modern slavery and human trafficking through their force systems;</p> <p>b) identify possible victims of modern slavery;</p> <p>c) recognise that victims of modern slavery should not be treated as criminals in situations where they have been forced to commit an offence by their exploiters;</p> <p>d) know how to take immediate steps to make victims feel safe (including facilitating access to a place of safety, if necessary);</p>	<p>AMBER</p>	<p>October 2021</p> <p>Now November 2021</p>	<p>a) easily access information and advice on modern slavery and human trafficking through their force systems</p> <p>The force SOP is reviewed and updated regularly to ensure it provides up to date information and links to advice.</p> <p>The modern slavery intranet page contains up to date guidance for officers including front line officers and investigators.</p> <p>All front-line staff have been issued with a modern slavery initial actions pocket guide.</p> <p>Modern Slavery SPOCs across the force are trained to provide advice to staff encountering and investigating modern slavery.</p> <p>Trained Modern Slavery Victim Liaison Officers are embedded in front line response teams and investigative departments.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>e) understand how to advise victims what support is available them;</p> <p>f) understand the National Referral Mechanism and duty to notify requirement, and know how to make good-quality referrals; and</p> <p>g) ensure that the statutory defence (provided by section 45 of the Modern Slavery Act 2015) for victims of slavery and exploitation who are compelled or coerced into committing offences by their exploiters is considered in all cases to protect victims from prosecution.</p>			<p>A 2-day modern slavery investigator course is being developed in conjunction with L&amp;OD which will be delivered to all detectives / investigators.</p> <p>Modern Slavery will be included in the next round of vulnerability training for front line officers.</p> <p>- Dedicated exploitation sergeant within PPU will be contact point for advice relating to Modern Slavery</p> <hr/> <p>b) identify possible victims of modern slavery</p> <p>Training and CPD has been provided to front line officers to ensure they spot the signs of modern slavery.</p> <p>Modern slavery SPOCs are embedded across frontline staff and investigators.</p> <p>All crimes across the force are reviewed by the force resolution centre and then again in the Daily Crime Meeting chaired by Head of CID (MSHT lead) and attended by PPU (MSHT lead department). Any concerns are flagged in these meetings.</p> <p>Key word searches on force systems are also conducted by the intel SPOC and the Force Crime registrar to ensure potential victims have not been missed.</p> <p>Any learning to fed back to SPOCs in MSHT SPOC meetings to disseminate to their teams.</p>

**Appendix A**  
**September 2021**

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p data-bbox="1464 276 2136 499">Operation Sun was launched after missed opportunities to identify potential victims of criminal exploitation. This resulted in further training inputs to frontline officers, custody and investigators. An action plan is available should there be a resurgence of the pattern seen pre-Covid.</p> <p data-bbox="1464 539 2123 643">CoLP are providing training to Corporation staff as part of Anti-Slavery day in October 2021 to ensure partners are identifying potential modern slavery victims.</p> <p data-bbox="1464 683 2092 786">2 CoLP modern slavery SPOCs are attending a train the trainer course allowing them to give inputs to partners and businesses within the City of London.</p> <hr/> <p data-bbox="1464 834 2119 938">c) recognise that victims of modern slavery should not be treated as criminals in situations where they have been forced to commit an offence by their exploiters</p> <p data-bbox="1464 978 2083 1082">This has been included as part of training inputs and formed part of the Operation Sun guidance to officers (Romanian juveniles).</p> <p data-bbox="1464 1121 2114 1225">Recently highlighted when 2 Vietnamese males inside a cannabis farm were released without charge enabling them to provide evidence against potential perpetrators.</p> <p data-bbox="1464 1265 2123 1369">Since Covid there have been limited incidents of criminal exploitation within the city due to a fall in crime rates and reduced footfall. This will need to be reviewed once the</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p data-bbox="1464 276 2107 344">associated crime types return to establish if the training has had an impact.</p> <p data-bbox="1464 384 2136 491">d) know how to take immediate steps to make victims feel safe (including facilitating access to a place of safety, if necessary)</p> <p data-bbox="1464 528 2136 555">This is included in part of modern slavery training and CPD.</p> <p data-bbox="1464 595 2101 738">Through Project Enterprise (Pan-London working) there are partnerships and experience which would allow the quick deployment and implementation of a reception centre.</p> <p data-bbox="1464 778 2051 927">CoLP have not yet had to use a reception centre for modern slavery but had one on standby during the previous Operation Aidant which was proactive intensification concentrating on child trafficking.</p> <p data-bbox="1464 967 2136 1110">On previous occasions potential child victims of exploitation have been taken to a place of safety after being put into police protection and were housed by social services.</p> <p data-bbox="1464 1150 2107 1257">On previous occasions potential adult victims of modern slavery has been taken to a place of safety before being housed through the NRM/Salvation Army.</p> <p data-bbox="1464 1297 2136 1361">Dedicated Exploitation Sergeant post created in PPU under Transform will be point of contact to ensure appropriate</p>

**Appendix A**  
**September 2021**

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p data-bbox="1464 276 2114 341">support services offered to victims/potential victims and will review all referrals.</p> <p data-bbox="1464 384 2063 450">e) understand how to advise victims what support is available them</p> <p data-bbox="1464 493 2136 558">Guidance has been provided to officers during training and is available on the intranet.</p> <p data-bbox="1464 601 2130 820">16 officers across CoLP have attended a 2-day college of policing Modern Slavery Victim Liaison Officer training course and a CoLP Victim Liaison Officer[VLO] logbook has been created which includes relevant information for the VLO's. They are able to provide initial support to victims and advise colleagues of support available.</p> <p data-bbox="1464 863 2123 963">CoLP have access to Victim Navigators through Project Enterprise, who would support the victim throughout the whole process.</p> <p data-bbox="1464 1007 2123 1150">CoLP work with a number of charities who provide advice and support to victims. Charities such as Tamar are often utilised during proactive operations such as visits to sex workers.</p> <p data-bbox="1464 1193 2136 1337">Dedicated Exploitation Sergeant post created in PPU under Transform will be point of contact to ensure appropriate support services offered to victims/potential victims and will review all referrals.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p data-bbox="1464 276 2078 347">Vulnerable Victim Coordinator available to assist with signposting to appropriate support.</p> <p data-bbox="1464 384 2114 491">f) understand the National Referral Mechanism and duty to notify requirement, and know how to make good-quality referrals</p> <p data-bbox="1464 528 2056 600">Training and CPD in this area have been provided to students, frontline officers and investigators.</p> <p data-bbox="1464 636 2096 708">Advice is found in the SOP, on the intranet and through modern slavery SPOCs.</p> <p data-bbox="1464 745 2114 968">NRM referrals and detentions are regularly reviewed by the MSHT lead, PPU and during SPOC meetings, with feedback provided. Reviews of NRM referrals shows that training has improved the quality of submissions and the associated admin. This has recently been highlighted by the force registrar.</p> <p data-bbox="1464 1005 2136 1157">Dedicated Exploitation Sergeant post created in PPU under Transform will be point of contact and will be reviewing and monitoring all NRM referrals and detentions to ensure high standard manage onward processing.</p> <p data-bbox="1464 1193 2114 1299">g) ensure that the statutory defence (provided by section 45 of the Modern Slavery Act 2015) for victims of slavery and exploitation who are compelled or coerced into</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>committing offences by their exploiters is considered in all cases to protect victims from prosecution.</p> <p>Training and CPD in this area have been provided to students, frontline officers and investigators. This included a dedicated Section 45 training session.</p> <p>Advice is found in the SOP, on the intranet and through modern slavery SPOCs.</p> <p>Although officers are aware of Section 45 and it is regularly considered for certain crime types, further work is required to ensure this statutory defence is considered in ALL criminal investigations and addressed in interviews. Although there have been limited cases in CoLP the national picture shows a clear pattern of Section 45 being used as a last-minute defence.</p>
<p>3</p> <p><u>Recommendation</u></p> <p><u>To chief constables</u></p> <p>Assure themselves that their resources are being deployed to enable effective investigation of modern slavery offences (which may, for example, involve taking account of high levels of vulnerability and organised crime group involvement). They should assure themselves that their crime allocation processes direct investigations to the most appropriately skilled individuals and teams.</p>	<p>AMBER</p>	<p>October 2021</p> <p>Now November 2021</p>	<p>Under the new Transform TOM, an updated acceptance criteria and investigative ownership SOP is being designed to ensure effective management of risk and investigation of OCGs, this will be in line with current TTCG process for effective mobilisation of resources</p> <p>Operation Aidant is a good opportunity to target modern slavery within the city whilst working with Pan-London resources, NCA and other partner agencies. These are proactive intensification weeks targeting specific areas of modern slavery which occur every few months. For these operations to be successful within the city it requires the buy in of departments across the force.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>4</p> <p><u>Recommendation</u></p> <p>To chief constables, and police and crime commissioners Work together to understand the support needs of victims of modern slavery crimes. They should provide appropriate support within their respective remits to augment the national provision so that victims feel safe and empowered to remain involved in any investigations. This should focus on what support should be available before and after National Referral Mechanism (NRM) referral as well as alternative provision available for those declining NRM referral.</p>	<p>AMBER</p>	<p>October 2021</p> <p>Now November 2021</p>	<p>Modern Slavery leads attend national CPD, regular Pan-London practitioner meetings (Project Enterprise) and sit on the City of London Corporation working group ensuring up to date guidance is shared to SPOCs and the wider force.</p> <p>Guidance has been provided to officers during training and is available on the intranet.</p> <p>16 officers across CoLP have attended a 2-day college of policing Modern Slavery Victim Liaison Officer training course and a CoLP Victim Liaison Officer logbook has been created which includes relevant information for the VLO's. They are able to provide initial support to victims and advise colleagues of support available.</p> <p>CoLP have access to Victim Navigators through Project Enterprise, who would support the victim throughout the whole process.</p> <p>CoLP work with a number of charities who provide advice and support to victims. Charities such as Tamar are often utilised during proactive operations such as visits to sex workers.</p> <p>Vulnerable Victim Advocate can signpost victims to most appropriate support agencies.</p> <p>PPU officers work closely with partners to ensure multiagency approach to safeguarding and support.</p>
<p>5</p> <p><u>Recommendation</u></p> <p>To the Home Office</p>	<p>WHITE</p>		<p>This action is for the Home Office</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
Assure themselves that the support mechanisms provided by bodies under government funding are consistently making available high-quality provision for victims of modern slavery.			
<p><u>Recommendation</u></p> <p><u>Monitoring of recommendations</u></p> <p>a) Home Office to provide a report to Her Majesty’s Chief Inspector of Constabulary on progress in implementing its recommendations within six months of the date of publication of this report.</p> <p>b) National Police Chiefs’ Council to collate Chief Constables’ progress in reviewing and where applicable implementing their recommendations and report these to Her Majesty’s Chief Inspector of Constabulary within six months of the date of publication of this report.</p> <p>c) Association of Police and Crime Commissioners to collate Police and Crime Commissioners’ progress in reviewing and where applicable implementing their recommendations and report these to Her Majesty’s Chief Inspector of Constabulary within six months of the date of publication of this report</p>	<b>WHITE</b>		<p>These actions are for HMICFRS, NPCC and APCC. However the force should note that force level progress will be reviewed by the NPCC for onward reporting.</p>

## The police response to the coronavirus pandemic during 2020

A national report HMICFRS

Published 20<sup>th</sup> April 2021

There are 5 actions for the force, 4 are complete and 1 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><u>Recommendation</u> Managing registered sex offenders Forces must immediately make sure that officers understand and correctly implement the guidance for managing registered sex offenders during the pandemic.</p>	NEW GREEN	July 2021	<p>The context of the recommendation and the City position is set out below.</p> <p>HMICFRS found that forces interpreted national guidance in different ways. During lockdowns some forces stopped visiting low and medium risk offenders in favour of telephone/virtual online visits.</p> <p>HMICFRS concerns is that these mitigations remain in place when lockdown restrictions were lifted. This was not the case for the City – face to face visits were maintained putting in place appropriate safety mitigations.</p> <p>HMICFRS also found the police extending their remit to undertake visits and ARMS assessments the should have been completed by Probation Officers. CoLP did not complete any ARMs assessments for the probation service.</p>
2	<p><u>Recommendation</u> Legislation and guidance Forces must immediately make sure they can manage their responses to changes in coronavirus-related legislation. They must ensure frontline officers and staff are clear about the difference between legislation and guidance.</p>	NEW GREEN	July 2021	<p>The force utilised a ‘rolling log’ on the intranet ensuring new information is released timely.</p> <p>Officers have been briefed specifically on the 4E approach and there was a generally good understanding of the core components of the legislation.</p> <p>City Silver does not recall any instances of powers being used to enforce guidance – officers typically utilised the first 3Es to resolve incidents.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>The force has moved to Step 2 of the roadmap -enforcement has diminished to almost nothing with no fines/use of powers issued/recorded in the week ending Monday 7 June.</p> <p>All of the NPCC guidance has been distributed regularly across the teams ensuring the most up to date information and guidance was/is available.</p> <p>To date, City Silver has not been made aware of any process issues in relation to enforcement which is an indication of sound application thus far.</p>
<p>3</p> <p><u>Recommendation</u> Test, track and trace Forces must immediately put in place a policy to make sure that they follow the guidance and self-isolation directions when members of the workforce come into contact with someone with coronavirus symptoms.</p>	<p>NEW GREEN</p>	<p>July 2021</p>	<p>The force has an intranet based rolling log which includes advice and guidance including signposting to Public Health England guidance.</p> <p>The rolling log has a frequently asked questions section and includes:</p> <ul style="list-style-type: none"> <li>• How absences must be reported</li> <li>• What Line managers must do</li> <li>• How HR will monitor and liaise with Emergency Planning to instigate testing.</li> </ul> <p>Emergency Planning who lead on all contact tracing and from lockdown 1 to the point TAMAR Sx stood down they provided an internal contact-tracing service for any officer/member of staff who became symptomatic or receives a positive test.</p> <p>City Silver is not aware of any instances where the force directed staff not to self-isolate based on a notification from the NHS, either from the T&amp;T service or the App. The force went further and put in</p>

**Appendix A  
September 2021**

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>place our own isolation requirements (essentially keeping people out of the workplace) for anyone working in a critical function who might be a close contact prior to a test result coming back [management protection].</p> <p>COVID Sx was involved in the decision making for most if not all uses of management protection and a cautious approach was taken – preferring the short term abstraction to an outbreak in key teams</p> <p>Emergency Planning provide a ‘COVID Tac Advisor’ on an on-call, 7 day per week basis from lockdown 2 onwards, only standing down 2 weeks after the TAMAR Sx had stood down to ensure consistency of advice and support consistency of decision making.</p>
<p>4</p> <p><u>Recommendation</u> Custody records Forces must immediately make sure that they clearly and consistently record on custody records information about how/when/if detainees are informed of the temporary changes to how they can exercise their rights to legal advice and representation. The record must make clear how any consents are obtained about the way in which legal advice and representation are provided.</p>	<p><b>NEW GREEN</b></p>	<p>August 2021</p>	<p>Guidance has been issued on informed consent – this is the method by which if a solicitor does not attend the police station to provide face to face advice for an interview then this must be agreed by the detainee and the detainee must sign to show that they understand and consent to this process, Custody Manager is capturing data which shows that informed consent is being recorded; there have been instances where officers have not recorded this information and all officers have been contacted and provided feedback.</p>
<p>5</p> <p><u>Recommendation</u> Overall scale and impact of changes Within six months, forces must assess the sustainability of any temporary measures introduced during the pandemic that change the way they work. They must understand positive, negative and unintended consequences of the scale and impact of the changes</p>	<p><b>AMBER</b></p>	<p>October 2021</p>	<p>This is currently being considered.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
before determining if any of these new ways of working should continue.			

## Custody services in a COVID-19 environment

A national report HMICFRS

Published 20<sup>th</sup> April 2021

There are 2 actions [1 suggested], both are completed.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>1</p> <p><u>HMICFRS 'Suggested Action'</u> Forces should collect enough of the right information at the right level and detail about the continuing effects of the pandemic (costs, new/additional demand, absence, annual leave, custody and detainees etc) so they can resource their work appropriately.</p>	NEW GREEN	July 2021	All aspects of custody and monitored by Custody Management Group which considers a number of performance measures to ensure the appropriate running of custody.
<p>2</p> <p><u>Recommendation</u> To help clarify the custody information that forces collect and use, we recommend that forces:  <ul style="list-style-type: none"> <li>• [a]track the numbers of detainees with, or suspected of having, COVID-19;</li> <li>• [b]record and monitor the length of time detainees remain in police custody, and any additional detention times due to waits for virtual remand hearings;</li> </ul> </p>	NEW GREEN	September 2021 for bullet [a]	<p>Supporting evidence against the respective bullet a to d are shown below:</p> <p>Bullet [a] The Custody Manager has introduced a process for collecting this information - data will be available from 1st August 2021. This information will be included in the next update report to Custody Management Group.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<ul style="list-style-type: none"> <li>• [c]record and monitor the way in which detainees receive their legal rights, and how many receive them by virtual means rather than a solicitor attending in person; and</li> <li>• [d]record the use of bail and released under investigation, and assess any increases in pre-charge bail.</li> </ul>			<p>Bullet [b]</p> <p>Monthly performance reporting (produced by PIU) monitors overall detention time spent in Custody and date / hours of arrival as BAU. As part of this data capture the recording system captures how long a detained person has been in Custody pre and post charge.</p> <p>Data is available which shows when a detained person is charged and when they leave Custody.</p> <p><u>Virtual Remand Hearings [VRH]</u> Data spreadsheet maintained within Custody Management which identified and allowed for monitoring of additional costs and extended time periods of detention.</p> <p>VRHs were used in force during the period 05/05/20 and 02/12/20. Of the 113 detained persons remanded during this period, 80 detained persons were subject to a VRH with remaining 33 taken directly to court.</p> <p>The average extra time spent in Custody as a result was 7 hours ranging from a minimum of 0.18 of an hour to a maximum of over an additional 24 hours.</p> <p>VRH are currently not being used in force.</p>

**Appendix A  
September 2021**

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p data-bbox="1485 276 1592 304">Bullet [c]</p> <p data-bbox="1485 344 2119 708">Guidance has been issued on informed consent – this is the method by which if a solicitor does not attend the police station to provide face to face advice for an interview then this must be agreed by the detainee and the detainee must sign to show that they understand and consent to this process, Custody Manager is capturing data which shows that informed consent is being recorded; there have been instances where officers have not recorded this information and all officers have been contacted and provided feedback.</p> <p data-bbox="1485 804 2119 911">Bullet [d] This recommendation is linked to recommendation 8 of the HMICFRS: striking a balance report.</p> <p data-bbox="1485 951 2119 1331">The use of bail and released under investigation is monitored at the Offender Management group, including trends. Niche reports are produced fortnightly and distributed. The Domestic abuse SOP clearly states the starting position bail, any discission to RUI must be fully justified. PPU report that if the suspected is not charge straight away the vast majority are bailed with conditions. The Crime Scrutiny Group includes Domestic Abuse within their scheduled audit – bail conditions and RUI are examined.</p>

## Getting the balance right?

### An inspection of how effectively the police deal with protests

A national report HMICFRS

Published 11<sup>th</sup> March 2021

There are 5 actions for the force, 2 complete and 3 in progress.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>1</p> <p><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.</p>	<p>AMBER pending Transform changes</p>	<p>Dec 2021 pending Transform changes embedded</p>	<p>Force Intelligence Bureau [FIB] currently do the NPoCC returns and the Force complies with the NPoCC SIB requests. These were completed by the researcher within FIB.</p> <p>CoLP link with Met and assure intel is exchanged.</p> <p>There is a national bi-weekly meeting that would allow a national picture being reviewed and assessed.</p> <p>It would be an assessment that we take more than we give in relation to an intelligence exchange.</p> <p>Under Transform the intelligence function will be taking all protest work excluding Extreme Right Wing as that will remain within the Special Branch arena. FIB will no longer exist. This will bring it in line with SIB [National]. As FIB will no longer exist</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>under Transform it will fall to the Intel Development Officers (IDO) under DCI Head of Intelligence Development.</p> <p>Post 28th June 2021 and implementation of Transform model there is currently no individual to act as the IDO for protest but there is supporting analytical staff. This has been discussed at the Intel Transform meetings but still requires direction from SLTs or Project Board.</p>
<p>4</p> <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>	<p>NEW GREEN</p>	<p>August 2021</p>	<p>Detailed methodology is reflected in the Force Public Order STRA [POSTRA] and FMS STRA for Local Policing/Community Policing Task force.</p> <p>POSTRA – March 2021 – details establishment for Public Order Commanders (5 Gold, 6 Silver and 13 bronze).</p> <p>Force Management Statement for 2021 – to include not only numbers of specialist officers available but rationale for numbers determined as required (from above).</p> <p>Consideration is covered extensively in both force PO STRA and FMS STRA for Local Policing/Community Policing Task force &amp; Contact.</p>
<p>7</p> <p><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>	<p>AMBER</p>	<p>December 2021</p>	<p>CoL City Sols Department currently considered the force’s Legal Services Team. However, it is yet to be ascertained if they would</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>be able to access CoP Policing Knowledge Hub from CoL accounts.</p> <p>The use of legal services provided by City Sols is under consideration and there is a plan being developed to bring the Force Solicitor post back in house. If this transpires this position should become member of recommendation's Group.</p>
<p>9</p> <p><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"> <li>• forces give adequate consideration to debriefing all protest-related policing operations;</li> <li>• the extent of any debrief is proportionate to the scale of the operation;</li> <li>• a national post-event learning review form is prepared after every debrief; and</li> <li>• the form is signed off by a gold commander prior to submission to the National Police Coordination Centre.</li> </ul>	<p>AMBER</p>	<p>December 2021</p>	<p>Waiting for input from Emergency Planning and action set at Public Order Working Group to agree criteria for when debrief required and appropriate situations to have them.</p>
<p>12</p> <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 residents, visitors to an area, businesses, and the critical infrastructure including transport networks and hospitals.</p>	<p>NEW GREEN</p>	<p>December 2021</p>	<p>The current process has been well received and works with impact questions with the community under Bronze communities and should events occur then statements are obtained under the guidance of Bronze communities.</p>

## Disproportionate use of Police powers

A national report HMICFRS

Published 26<sup>th</sup> February 2021

There are 6 actions for the force, 2 are complete and 4 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment	
				Ref.	Task
1	<p><u>Recommendation</u> By July 2022, forces should ensure that officers and staff have effective communication skills, in line with the National Policing Guidelines on Conflict Management. This should be in addition to existing training on conflict management and de-escalation.</p>	AMBER	July 2022	1.1	<p><u>Task</u> Learning &amp; Development to produce a written report to Stop &amp; Search and Use of Force working group that covers the following:</p> <ul style="list-style-type: none"> <li>[1] Unconscious bias training [officers and staff], what has been done already [numbers trained] and what are future plans [mandatory, TIB approved]</li> <li>[2] Update the force training plan to bullet 1.</li> </ul> <p><u>Current position</u> A report has been produced and will be presented at the next Stop &amp; Search and Use of Force working group. It details the number that have completed the unconscious bias training (now over 1090) since this has been mandated. It also includes a summary of our virtual learning events aimed at raising awareness around different protected characteristics and unconscious bias more generally. Attendance has been good and feedback overwhelmingly positive, leading to a significant increase</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			in mentoring requests and interest in our PALs (Positive Action Leadership Scheme).
			<p>1.2</p> <p><u>Task</u> Paper to S&amp;S and UoF working group – would our officers benefit from additional training similar to that described in the report ‘Humberside’ but tailored for the minority groups we come into contact with.</p> <p><u>Current position</u> A company has been identified who provide community engagement training. The force has agreed to run a pilot course with them and gain detailed feedback, monitoring learning and any behaviour change.</p>
			<p>1.3</p> <p><u>Task</u> Present documented updates to S&amp;S and UoF meetings – status of delivery against the agreed training in 1.1 above. Specifically number to be trained and number trained.</p> <p><u>Current position</u> These to be presented to the next S&amp;S and UoF working group.</p>
			<p>1.4</p> <p><u>Task</u> Written report to S&amp;S &amp; UoF working group– what informal communication training is currently delivered, to who and how often.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment	
					<p>Does it include officers and frontline civilian staff?</p> <p>Is it deem sufficient?</p> <p>Is communication skills included in Personal Safety Trinaing?</p> <p>Does it reference College of Policing guidance?</p> <p><u>Current position</u> This report is currently pending.</p>
2	<p><u>Recommendation</u> By July 2021, forces should ensure that communication skills are reinforced as part of the programme of continuing professional development for officers and staff, and that supervisors are supported to routinely and frequently debrief officers on these skills using body-worn video footage.</p>	RED	<p>July 2021</p> <p>Now October 2021</p>	<b>Ref.</b>	<b>Task</b>
				2.1	<p><u>Task</u> A schedule of past and future CPD events for officers and staff to be produced that focuses on or includes 'communication skills'.</p> <p><u>Current position</u> L&amp;OD are currently looking at hosting a force-wide virtual event, planning for Sept 2021, which will be open to all and cover the NDM alongside basic communication skills.</p>
				2.2	<p><u>Task</u> Document the regime of body worn video review by supervisors [frequency and how learning is feedback to officers]. Where is this feedback recorded – good or not so good?</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment	
					<p><u>Current position</u> Progress on this recommendation has been delayed by the short-notice retirement of two key officers involved in this work: the tactical leads for Stop/Search and Body Worn Video.</p> <p>The Body Worn Video [BWV] SOP is being completely re-written to provide clearer guidance and direction on supervisor reviews, including for Stop/Searches.</p> <p>In the interim, two measures are being implemented:</p> <ol style="list-style-type: none"> <li>1. Dip sampling of Stop/Search reports and BWV by Strategic &amp; Tactical lead for Stop/Search and Use of Force. Completed and feedback shared with frontline officers, supervisors, and L&amp;OD [COMPLETE].</li> <li>2. Interim guidance being issued to Local Policing supervisors setting out on going requirement for dip sampling of BWV recordings, in lieu for the revised BWV SOP [Will be issued by Fri 20 Aug 21].</li> </ol>
3	<p><u>Recommendation</u> By September 2021, forces should:</p> <ul style="list-style-type: none"> <li>• ensure that officers record on body-worn video (when this is available) the entirety of all stop and search encounters, including traffic stops and use of force incidents;</li> <li>• have a structured process for regularly reviewing and monitoring internally a sufficient sample of body-worn video footage to identify and disseminate learning and hold</li> </ul>	AMBER	September 2021	Ref.	Task
				3.1	<p>Task To consider updating Body worn video [BWV], stop &amp; search and Use of Force SOP to reflect mandatory use [when BWV is available].</p> <p><u>Current position</u></p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>officers to account when behaviour falls below acceptable standards; and</p> <ul style="list-style-type: none"> <li>provide external scrutiny panel members with access to samples of body-worn video footage showing stop and search encounters and use of force incidents, taking account of the safeguards in the College of Policing's Authorised Professional Practice.</li> </ul>			<p>This has been considered at the Stop/Search and Use of Force Working Group (May and Aug 21).</p> <p>The Working Group did <u>not</u> support mandating general BWV recording for a wide range of interactions: this would not be consistent with the legal framework for BWV and raises concerned about breaching individual Article 8 rights together with the proportionality of collecting mass amounts of video footage of otherwise law-abiding members of the community.</p> <p>There was also a concern that in some circumstances the situation can evolve very quickly, potentially precluding the opportunity to activate the BWV to capture the entire incident and the Working Group was mindful of the need not to set officers up to fail by mandating something which could not always be complied with.</p> <p>However, the Working Group also recognised that BWV has a critical role in demonstrating transparency, supporting police legitimacy and the effective handling of complaints. The Working Group therefore agreed that the BWV SOP re-write should reflect this and <b>“strongly recommend”</b> the use of BWV in all these circumstances whilst leaving it to the individual</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>officer to justify the use (or not) of the system in each situation.</p>
			<p><u>Task</u> Document the regime of body worn video review; this to be considered by S&amp;S and UoF working group for signoff.</p> <p><u>Current position</u> This will be set out in the revised BWV SOP as described above. This will include regular supervisor dip sampling (on the principal of 'little and often') as well as less regular but larger dip sampling by the Tactical and Strategic leads.</p> <p>With immediate effect, all Uses of Force involving Taser will be reviewed in the first instance by the Firearms Training Wing to inform the development and delivery of Taser training. This is in addition to the dip sampling described above.</p>
			<p><u>Task</u> Learning points and instances [not names] of officers being held to account to be reported [in writing] to the S&amp;S and UoF working group.</p> <p>How do we recognise good practise by officers?</p> <p><u>Current position</u> Highlighted by Supervisors and Force leads through scrutiny of S&amp;S UoF Niche reports BWV. Good practice</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
				<p>identified and feedback to individual officers and highlighted to IASG members at quarterly meetings.</p> <p>This action requires a new tactical lead be confirmed following the short notice retirement of the previous officer: this is linked with the Insp Posting Process.</p>
				<p><u>Task</u> Document how the external scrutiny group is provided access to samples of body worn video footage [S&amp;S and UoF]. Include frequency and numbers made available.</p> <p>This document to be reviewed by the S&amp;S and UoF working group.</p> <p><u>Current position</u> Advice from Force Solicitors still awaits, but a process has been developed and is ready to launch once legal advice has been received. This action has been delayed by the short notice retirement of the Tactical Lead and the delay in appointing a successor due to the Insp Posting Process.</p>
5	<p><u>Recommendation</u> By July 2021, forces should ensure they have effective internal monitoring processes on the use of force, to help them to identify and understand disproportionate use, explain the reasons and implement any necessary improvement action.</p>	RED	<p>July 2021</p> <p>Now October 2021</p>	<p><u>Task</u> To report [written] to the May 2021 S&amp;S and UoF working group what further inroads can be made to understand the UoF.</p> <p><i>[Does the location of the incident in the MPS area contribute to any disproportionality by way of higher (than 42%) BAME populations].</i></p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p><u>Current position</u> Performance information unit are continuing their research – initial work has examined any disproportionately of City Officer performing stops when operating within and without the City bounds.</p> <p>The deadline is extended noting vacancies with the Performance Information Unit.</p> <p>Stop/Search and Use of Force data is reported quarterly to the Stop/Search and Use of Force Working Group which has been in existence since at least 2019. The group includes representatives from across the Force, and is briefed on the data by Performance Information Unit providing the effective internal monitoring process referred to by HMICFRS. The reports presented to the Stop and Search and Use of Force working group are subsequently presented to the Police Standards &amp; Integrity committee of the Corporation and to the Independent Advisory &amp; Scrutiny Group (IASG) as well as being published on the Force website.</p>
<p>6</p> <p><u>Recommendation</u> By July 2021, forces should ensure they have effective external scrutiny processes in place in relation to the use of force. Forces should take account of feedback and update the scrutiny panel and the community on the action taken.</p>	<p>NEW GREEN</p>	<p>July 2021</p>	<p><u>Task</u> Document the arrangements for the external scrutiny group, including:</p> <ul style="list-style-type: none"> <li>• Current makeup</li> <li>• Terms of Reference</li> <li>• Frequency of meeting</li> <li>• How do we attract new members</li> <li>• Are minutes published by the group?</li> <li>• Do minutes reflect actions taken by the force?</li> </ul>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p><u>Current position</u> The Independent Advisory Scrutiny Group consists of a Chairperson, Deputy Chair Secretary and approx. 12 elected members.</p> <p><u>Task</u> Their Terms of reference are documented and they meet every 3 months. The group recruits its own members and although they do not publish their minutes, they do reflect the actions taken by the Force.</p>
<p>7 <u>Recommendation</u> With immediate effect, forces should ensure that all stop and search records include detail of the self-defined ethnicity of the subject. When this information is refused by the subject, the officer-defined ethnicity code should be recorded.</p>	<p><b>NEW GREEN</b></p>	<p>July 2021</p>	<p>This reflects existing practise within CoLP. Compliance is also monitored by the Stop and Search and Use of Force Working Group.</p>

## Police super-complaint<sup>1</sup>: 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 17<sup>th</sup> December 2020

---

<sup>1</sup> 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.

There are 4 actions for the force, 1 is complete and 3 in progress.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>1</p> <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> <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"> <li>• The College of Policing guidance will also clarify the difference between insecure and uncertain status and immigration offending.</li> <li>• Any sharing of information should be done in compliance with Information Commissioner's Office (ICO) guidance.</li> <li>• 'Third party' could include a local or national specialist victim support organisation or another</li> </ul>	<p><b>WHITE</b> pending the outcome of the NPCC Lead challenge to <b>HMICFRS</b></p>	<p>February 2021 for initial review [completed]</p> <p>July 2021 for the revision and publication of force SOP</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 July 2021 was set for the Domestic SOP to be revised, signed off and published, however there is an ongoing national challenge of the recommendations relating to this super complaint through NPCC lead. As such the force is not in a position to make further changes to policy until a national position agreed.</p> <p>The current force SOP already includes relevant guidance in relation to victims with no leave to remain.</p> <p>All cases are considered on an individual basis and there may be necessity to share information with immigration services in order to assist in safeguarding of victim.</p> <p>All cases where consent from victim is obtained are referred to specialist victim advocate who can assist with immigration issues as required and these are considered regularly as part of MARAC – with the overarching focus being on victim welfare.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>individual/organisation that can act as an intermediary and advocate on the victim's behalf in communications with Immigration Enforcement – as required.</p>			
<p>4</p> <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"> <li>ensure there is a proper policy and practice framework in place for officers to work within;</li> <li>develop victim and witness support policies that reflect the characteristics of the safeguarding protocol set out in recommendation 3, and;</li> <li>draw on all relevant national guidance with particular reference to the Code of Practice for Victims of Crime and data protection legislation;</li> <li>are developed in partnership with and include pathways to the relevant specialist organisations for supporting victims and witnesses with insecure immigration status;</li> <li>are clear about the circumstances in which information will be shared by police with immigration enforcement;</li> <li>provide clarity about the purpose of sharing information at different points of the pathway; and</li> <li>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> </ul>	<p><b>WHITE</b></p>	<p>February 2021 for initial review [completed]</p> <p>July 2021 for the review of relevant forces SOPs although compliance with this recommendation is dependant upon delivery of recommendation 3 by the Home Office and NPCC</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> <p>The NPCC Lead challenge [above] will also impact delivery].</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<ul style="list-style-type: none"> <li>• promote understanding among police officers and staff to differentiate between responses to victims of modern slavery/human trafficking and victims of domestic abuse;</li> <li>• promote awareness within their forces of any existing pathways to specialist organisations for supporting victims with insecure immigration status;</li> <li>• 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</li> <li>• promote police engagement in regular outreach community work, as highlighted as good practice in this report.</li> </ul>			
<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>	<p><b>WHITE</b></p>	<p>February 2021 for initial review</p>	<p>Delivery of this recommendation is heavy dependant upon outcomes from other report recommendations which are yet to be completed by partners. The NPCC lead challenge will also impact.</p>
<p>8</p> <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>	<p><b>NEW GREEN</b></p>	<p>July 2021</p>	<p>Strategic Development report the progress of all open action to our HMICFRS Force Liaison Lead [FLL, Supt Alan Kelly retiring July 2021].  Action plans for new reports are also to be produced in consultation with the HMICFRS FLL and this practise will continue with the new FLO [commences September 2021].</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment

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

A Joint National report, HMICFRS and HMCPSi

Published 8<sup>th</sup> December 2020

There are 10 recommendations 2 of which are for forces, 1 is complete and 1 in progress.

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>8</p> <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>	<p>NEW GREEN</p>	<p>March 2021 for initial review [completed]</p> <p>June 2021 for a report to CSB</p>	<p>This recommendation is linked to recommendation 2d of the HMICFRS: Custody services in a COVID-19 environment.</p> <p>The use of bail and Released Under Investigation[RUI] is monitored at the Offender Management group, including trends. Niche reports are produced fortnightly and distributed. The Domestic abuse SOP clearly states the starting position bail, any discussion to RUI must be fully justified. Public Protection Unit report that if the suspected is not charge straight away the vast majority are bailed with conditions. The Crime Scrutiny Group included Domestic Abuse within their scheduled audit – bail conditions and RUI are examined – this report was reviewed at Crime Standards Board June 2021.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
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>	AMBER	<p>March 2021 for initial review [completed]</p> <p>Now November 2021 to monitor compliance within the new system</p>	<p>The current position has been identified and is impacted by the implementation of a new system for communicating with the CPS [TWIF] which will go-live late September 2021.</p> <p>The form MG3 will be retired and TWIF will incorporate the information from the MG3 into a CMO1 (a form of messaging/data transfer). This is as a precursor for Digital Case File which will retire most of the MG forms in the future.</p> <p>Monitoring has been put in place to ensure compliance, but this will need to be replicated utilising the new system. Compliance results have been mixed to date and further messaging planned.</p> <p>Deadline set for November 2021 to enable further performance monitoring and bedding in of the new system/process.</p>

## Roads Policing – Not Optional

A National report HMICFRS

Published 15<sup>th</sup> July 2020

There are 10 recommendations for the force, 5 are completed, 2 closed [not applicable], 2 in progress and 1 on hold pending input from the College of Policing.

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"> <li>• [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;</li> <li>• [2]that information shared by partners relating to road safety is used effectively to reduce those risks and threats; and</li> <li>• [3]there is evaluation of road safety initiatives to establish their effectiveness.</li> </ul>	<p>RED</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>was April 2021</p> <p>Extended to July 2021 for review of progress</p> <p>Now January 2022 to further progress</p>	<p><u>[bullet 1] analytical capability</u></p> <p>Sustained analytical support has been an issue for the Roads Policing unit previously. Support has been built into the Transform model and a dashboard is to be produced on a quarterly basis utilising the force CRASH system.</p> <p>The outstanding issue which requires clarity around collision data is how the various changes over time have affected the data (there have been 3 system changes over the last 5-6 years or so, and each one has tweaked the definition of ‘serious’: so the data isn’t ‘wrong’ but it means it is not possible to do reliable retrospective analysis as systems change.</p> <p>The deadline is extended to January 2022 to enable this to be progressed further.</p> <p>Supt Head of City Police Task Force has created a Gold Group with relevant members of CoLP and CoL sitting on this group and continues to engage/monitor Transform for future design of intelligence / analytical capability and impact on Roads Policing and there regular discussions with CoL Strat Transport Team.</p> <p><u>[bullet 2] Information shared</u></p> <p>Dashboards produced are shared and meeting have taken place CoLp/CoL.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>A RDRP meeting took place in April 2021 with CoL in the chair, and LFB, TfL and LAS represented. Main focus of meeting was agreeing revised ToRs and scope/intent of partnership, as well as a general update from partners on current priorities/areas of focus. Areas for further work agreed for future meetings, and follow up bilateral meetings (initially CoL-CoLP) also agreed. Six month report to end of Dec 2020 discussed.</p> <p><u>[bullet 3] evaluation of road safety initiatives</u></p> <p>This area requires development in partnership with the City of London. Detailed update was not provided by CoL Strat Transport Team at April 2021 meeting of RDRP. Overall strategic intent post-COVID discussed, and concerns from CoLP and other blue light responders. More detailed discussion about the impact of the pilot 15mph initiative and the consequence if rolled out permanently: LAS in particular expressing concern about impact on response times and patient transfer times. Agreed for substantive review at next meeting.</p>
<p>8 <u>Recommendation</u> 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</p>	<b>CLOSED</b>	<p>December 2020 [subject to 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>

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>version of) Department for Transport Circular 1/2007 in relation to the use of speed and red-light cameras.</p>		<p>New deadline July 2021 [subject for review]</p>	<p>The CoL 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 CLOSED, whilst TfL still haven't responded there is confidence the force is doing all it should. TfL own the cameras; we administer them on their behalf.</p>
<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"> <li>• minimum national training standards; and</li> <li>• certification for all serious collision investigators.</li> </ul> <p>Chief constables should make sure that all serious collision investigators in their force are then trained to those standards.</p>	<p><b>WHITE</b></p>	<p>August 2021 for the College of Policing</p>	<p>This action is initially for the College of Policing. However, the force will include any College of Policing requirements in its training plans</p>
<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>	<p><b>NEW GREEN</b></p>	<p>September 2020</p> <p>Extended to January 2021</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>

Recommendations & Areas for Improvement		Status	Due Date	Comment
			<p>pending future regional and national meetings taking place]</p> <p>Now April 2021 since no future pending future regional and national meetings have been scheduled at this time</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 was held at white pending Superintendent level representation at national and regional meetings – CoLP are now invited to the two key NPCC-lead national roads policing meetings. The National Roads Policing Operations &amp; Intelligence meeting and the Driver Standards meeting (chaired by Cmdr Gordon (MPS) and DCC Woods (Lancashire) respectively). Head of Community Policing Task force attended previously, Commander Operations will attend in future.</p>
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>	RED	<p>September 2020 [subject to review]</p> <p>Now November 2020 [subject to input from CoL]</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] assists together consideration of analysis reports at the meetings.</p> <p>The force provided an analysis report for presentation to the 13<sup>th</sup> April 2021 RDR partnership meeting.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
		<p>Was to April 2021 [subject to review]</p> <p>Now July 2021 subject to review</p> <p>Now January 2022 to further progress</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> <p>A common source of data has been agreed – utilising the force CRASH for report to the RDRP partnership meeting – system changes of the years does present issues for comparative analysis , this continues to be examined.</p>

## Cyber: Keep the light on

A national report by HMICFRS  
Published October 2019

This report makes 5 recommendations; 4 are complete and 1 in progress pending further update from a joint working group [Home Office, CoLP and NPCC].

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"> <li>• the creation of a national police cyber-dependent crime network;</li> <li>• the remit of any such network;</li> <li>• how the network engages with other law enforcement agencies; and</li> <li>• the tasking and co-ordinating responsibilities that will be required for the network to be effective.</li> </ul>	<p><b>WHITE</b></p>	<p>November 2020</p> <p>Now September 2021 for update from the joint working group</p>	<p>Bullets 1 through 4 are, in part, for 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>The Home Office, CoLP and NPCC have agreed to establish a working group to consider options to implement the 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"> <li>• [1]the minimum standards for investigation;</li> <li>• [2]the role of regional cyber crime co-ordinators in the recording, management, and review of cyber crime investigations; and</li> <li>• [3]the use of the weekly list provided by the National Fraud Intelligence Bureau to comply with the performance indicators.</li> </ul>	<p><b>NEW GREEN</b></p>	<p>No deadline set by HMICFRS</p> <p>November 2020 for an initial position</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.</p> <p>All areas of improvement have now been addressed through the implementation of a revised Force Cyber Crime Unit Minimum Standard. This was approved by NPCC Crime Committee in March 2021 and has now been implemented.</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>The performance indicators referred to within the recommendations were set by the National Board Force Specialist Cyber Capability Project Board.</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, 1 closed and 1 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>	<b>CLOSED</b>	<p>February 2020</p> <p>Extended to September 2020</p> <p>Extended to February 2021</p> <p>Now June 2021 pending the results of benchmarking</p>	<p>Age and gender have already been recognised within the HMICFRS report as being collected.</p> <p>There are operational concerns that the process of collecting equality data may alienate victims reporting their crimes.</p> <p>A decision and the following actions implemented:</p> <ul style="list-style-type: none"> <li>• Continue to record ethnicity, age and gender for victims of crime (we currently capture these well as part of crime recording).</li> <li>• Record religion and sexuality if directly related to the crime type (ie aggravated/motivated hate crime).</li> <li>• Improve the recording of disability data.</li> </ul>
6	<p><u>Area for Improvement</u> The force should immediately improve its use of cannabis warnings, penalty notices for disorder and community</p>	<b>RED</b>	<p>February 2020</p>	<p>Audit results have not met the desired standards and further steps are being taken:</p> <ul style="list-style-type: none"> <li>• Guidance has been re-issued to officers for Community Resolutions, penalty notices for disorder and Cannabis Warnings</li> </ul>

**Appendix A  
September 2021**

Recommendations & Areas for Improvement	Status	Due Date	Comment
		<p>Extended to July 2020 but need to be reviewed [Reported to PAB]</p> <p>Extended to September 2020 to ensure improvements are embedded</p> <p>Extended to July 2021</p> <p>Now November 2021 to further assess performance</p>	<ul style="list-style-type: none"> <li>Digitisation of Cannabis Warnings and PND is being pursued. Digitisation of current paper based Cannabis Warnings and PNDs forms now in PRONTO development plan (previously not pursued as anticipated introduction of 2 Tier approach would render obsolete quickly). This will build in compliance for issuing PND/Cannabis warnings (as with National Crime Recording Standards for when crimes recorded) to remove some of the most basic human errors. Digitisation will be funded through 'core' development budget for PRONTO and by deprioritising other work. Grant from Home Office to cover (already expended) costs of developing DVLA 'Image At Roadside' functionality will be allocated to fund development of PENTIP search capability from PRONTO. Ability to search PENTIP automatically from PRONTO will create a process improvement and enable compliance to be enforced (the digital forms can be 'built' to not allow an officer to complete without a PENTIP search). Whilst this doesn't discount human error (eg ignoring the results of a search) it will reduce the scope for error through mis-application of the process (ie not doing a PENTIP search at all). Widespread introduction of biometric search capability for Local Policing officers will further assist in confirming subject identities and offender history which should further increase compliance.</li> </ul> <p>In April 2021 oversight was redesignated to the Head of Local Policing Chief Supt who has created a bespoke team of officers to drive the performance forward.</p> <p>This has firstly taken the form of revised guidance of what is expected and what is required when issuing Cannabis Warnings/Community Resolution/PND .</p>

**Appendix A**  
**September 2021**

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>The first areas of improvement was to improve initial compliance and day to day performance . The second areas was to look at the implementation of the 2 Tier OOC system</p> <p>Process maps are being designed to help guide officers through the issuing of the OOC options. These are due to be published July .</p> <p>Bi weekly audits are now being conducted and this is personally sent to the Head of Local Policing to look at trends and areas of failure. He is personally taking responsibility to speak with every officer and supervisor for failed OOC disposals to seek an explanation and understanding of why the incident failed within the audit. This learning is being cascaded back to the staff/teams to ensure onward compliance.</p> <p>Repeat offenders will be subject of discipline.</p> <p>OOC are within the monthly performance framework within the Inspectors performance meetings with Supt Local Policing. 95% of OOC disposals are issued within Local Policing hence the overview by the Chief Supt to drive an improvement within this area. Overall governance remains within Administration of Justice.</p> <p>Onward training is being completed to ensure culturally the performance increased long term with a real focus on supervision” Getting it right first time”</p> <p>Volume of Out of Court Disposals remains relatively Low compliance has remained steady at around 85% compliance on around 15-20 occurrences per fortnight.</p> <p>TIER 2 OOC .</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>Fact finding has been conducted with Thames Valley Police on looking at pathways for the various pathways required to extend the OOC to a 2 tier system. The Force has joined a working group with the MPS/BTP with a view to potentially share services and implement the 2 tier system. This is in the early stages presently . It is envisaged that the timeline for a implementation of Tier 2 will be Autumn 2022 this is the information currently in receipt of COLP</p> <p>Ch Supt Head of Local Policing has taken over as the strategic lead for Out of Court Disposals, this remains within Administration of Justice for overview . Head of Local Policing is leading on the performance review and improvements and will provide assistance and an overview for the development of the 2 Tier system to support Head of CJS and her team with the implementation of the 2 Tier system which is still in the infancy of its planning as it is a significant Force change project itself.</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>RED</p>	<p>January 2020</p> <p>Extended to November 2020 [Previously Reported to PAB]</p> <p>extended to February 2021 for review</p> <p>Now December 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 has not commenced at this time.</p> <p>The deadline is extended accordingly.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>The Head of Major Crime is temporary covering the Victim Champion until Transform can recruit and embed the new civilian Champion.</p> <p>The Head of Major Crime will:</p> <ol style="list-style-type: none"> <li>1. reignite the above mentioned 'Victim Virtual Journey' workshops to establish the current workflows and introduce measures to improve performance and satisfaction.</li> <li>2. carry out benchmarking, consultation and include partners to inform decision making and</li> <li>3. introduce new systems/SOP where necessary.</li> </ol> <p>Progress thus far: Performance Information Unit has commenced producing weekly VCOP completion &amp; compliance reports which will help inform officer completion rates, and the follow up journey with victims of crime.</p> <p>Weekly Niche OEL VCOP reports are produced and are actively monitored with performance engagement – this reports into Crime Standards Board.</p>

## 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>	<p>AMBER</p>	<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 November 2020 subject to review</p> <p>Extended to April 2021 [subject to review]</p> <p>Now October 2021</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> <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.</p> <p>Victim support have readvertised and the new full time VVA has now commenced [with victim support].</p> <p>Performance Information Unit are to now provide the data to enable sampling to take place.</p>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			<p>Current funding/VVA arrangements are not seen 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.</p> <p>The full review report focused on Women and Girls [standing together] support has been circulated to Vulnerability Steering Group [June 2021] and a draft joint strategic action plan developed which incorporates actions relating to VVA funding.</p> <p><u>Deadline Rationale</u></p> <p>A revised deadline of October 2021 is set to review the current position regarding surveys and to establish progress on actions regarding future funding of the VVA</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
<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>	<p><b>WHITE</b></p>	<p>August 2019</p>	<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"> <li>• We recommend that, within six months, the NPCC lead for hate crime works with the College of Policing to review the operational guidance about the minimum standard of response to establish if it is still appropriate and relevant for forces</li> <li>• We recommend that, following the review, any agreed minimum standard of response for forces should be monitored by force governance processes, including external scrutiny.</li> </ul>	RED	<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 deadline has been reset to June 2021 to enable Sector Policing to embed necessary changes</p> <p>The following actions have been developed:</p>	
		<p>Now October 2021 to establish progress on [2], [4] and [5]</p>	<p><u>Task [1]</u> PPU will review the current SOP to include the new links to APP and the need to follow the minimum standard of response</p> <p><u>Current position</u> The SOP has been updated to reference the Hate Crime SOP, this has now moved to Sector Policing to progress task 2 below.</p>	GREEN
			<p><u>Task [2]</u> 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.</p> <p><u>Current position</u> Sector policing have updated the SOP and passed to the Equality &amp; Inclusion Manager for review. The National Vulnerability Action Plan has been updated for the Vulnerability Working Group.</p>	AMBER

Recommendations & Areas for Improvement	Status	Due Date	Comment	
			<p><u>Task [3]</u> T/DCI Crime will incorporate Hate Crime in to the Dip Sampling schedule. Showing internal scrutiny</p> <p><u>Current position</u> This has been included with the schedule. Hate crime criteria in development included in the July/Aug 2021 theme. This will reported in to Crime Standards Board for appropriate actions.</p>	<b>GREEN</b>
			<p><u>Task [4]</u> Once the additional VVA post is in place – the independent survey of victims of hate crime</p> <p><u>Current position</u> VVA has now started [with victim support] but can commence sampling when process designed. Performance Information Unit now to provide input to develop surveys and analysis</p>	<b>AMBER</b>
			<p><u>Task [5]</u> External scrutiny, Sector Policing ensure arrangement are in place via the IASG.</p> <p><u>Current position</u></p>	<b>AMBER</b>

Recommendations & Areas for Improvement	Status	Due Date	Comment
			This to be discuss with the Equality & Inclusion Manager - meeting requested.

## PEEL: Police Effectiveness 2017 – National

A national report by HMICFRS  
Published March 2018

This report was published 22<sup>nd</sup> March 2017. There are 4 recommendations which apply to the force and are to be progressed.

There are 4 recommendations which applies to the force; 3 are complete, 1 closed

Recommendations & Areas for Improvement	Status	Due Date	Comment
<p>3</p> <p><b>Recommendation</b> The College of Policing, working with the NPCC leads, should develop an approach to peer review. This approach should support forces to work with each other to improve how they identify, respond to and keep safe vulnerable victims. The infrastructure to support peer reviews should be in place by September 2018 with the first reviews taking place by January 2019.</p>	<b>CLOSED</b>	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 has been undertaken and released to forces.