

HMICFRS Report Recommendations

Traffic Light Colour	Definition of target achievement
GREEN	The recommendation is implemented
AMBER	The recommendation is subject to ongoing work and monitoring
RED	The recommendation should have been implemented but has not been due to resource issues or force capability to complete and remains outstanding
WHITE	The recommendation is no longer required / relevant or is dependent upon another organisation.


Individual recommendations may require multiple tasks to be completed by task owners from across the force before they can be discharged. The schedule below details the owners of tasks against individual recommendations highlighting those which are outstanding.

A joint thematic inspection of the criminal justice journey for individuals with mental health needs and disorders

A national report HMICFRS

Published 17th November 2021

This report makes 7 recommendations aimed at the Police, all are currently open.

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January 22	Direction of Travel
10	<u>Recommendation</u> Local criminal justice services (police, CPS, courts, probation, prisons) and health commissioners/providers should:	AMBER	November 2022	December 21 Recommendation has been sent to the Business lead for this asking for assessment of current arrangements and	Head of Learning & Development	Amber - this is a new recommen	

	develop and deliver a programme of mental health awareness-raising for staff working within criminal justice services. This should include skills to better explain to individuals why they are being asked questions about their mental health so that there can be more meaningful engagement			whether they are sufficient or whether further improvement required		dation with actions to complete being assessed.	
11	<u>Recommendation</u> Local criminal justice services (police, CPS, courts, probation, prisons) and health commissioners/providers should: jointly review arrangements to identify, assess and support people with a mental illness as they progress through the CJS to achieve better mental health outcomes and agree plans for improvement.	AMBER	November 2022	December 21 Recommendation has been sent to the Business lead for this asking for assessment of current arrangements and whether they are sufficient or whether further improvement required	Head of CJS Services	Amber - this is a new recommendation with actions to complete being assessed.	↔
14	<u>Recommendation</u> Ensure that all dedicated investigative staff receive training on vulnerability which includes inputs on responding to the needs of vulnerable suspects (as week as victims). This should be incorporated within detective training courses.	AMBER	November 2022	December 21 Recommendation has been sent to the Business lead for this asking for assessment of current arrangements and whether they are sufficient or whether further improvement required	Head of Learning & Development	Amber - this is a new recommendation with actions to complete being assessed.	↔
15	<u>Recommendation</u> Dip sample (outcome code) OC10 and OC12 cases to assess the standard and consistency of decision making and use this to determine any training or briefing requirements and the need for any ongoing overnight	AMBER	November 2022	December 21 Recommendation has been sent to the Business lead for this asking for assessment of current arrangements and whether they are sufficient or whether further improvement required	Head of CJS Services	Amber - this is a new recommendation with actions to complete	↔


						being assessed.	
16	<u>Recommendation</u> Review the availability, prevalence, and sophistication of mental health flagging, to enhance this where possible, and to consider what meaningful and usable data can be produced from this.	AMBER	November 2022	December 21 Recommendation has been sent to the Business lead for this asking for assessment of current arrangements and whether they are sufficient or whether further improvement required	Head of CJS and Custody	Amber - this is a new recommendation with actions to complete being assessed.	↔
17	<u>Recommendation</u> Assure themselves that risks, and vulnerabilities are properly identified during risk assessment processes, particularly for voluntary attendees. They must ensure that risks are appropriately managed, including referrals to Healthcare Partners, Liaison and Diversion and the use of appropriate adults.	AMBER	November 2022	December 21 Recommendation has been sent to the Business lead for this asking for assessment of current arrangements and whether they are sufficient or whether further improvement required	Head of CJS and Custody	Amber - this is a new recommendation with actions to complete being assessed.	↔
18	<u>Recommendation</u> Review management guidance forms to include prompts or dedicated sections for the suspects vulnerability to be included	AMBER	November 2022	December 21 Recommendation has been sent to the Business lead for this asking for assessment of current arrangements and whether they are sufficient or whether further improvement required	Director of Information	Amber - this is a new recommendation with actions to complete being assessed.	↔

Police response to violence against women and girls - Final inspection report

A national report HMICFRS

Published 17th September 2021

This report makes 5 recommendations each of which include a number of sub-actions. 2 recommendations apply to the force [in part] at this time; 1 is complete, 1 in progress.


Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January 22	Direction of Travel
4	<u>Recommendation</u> All chief constables should immediately review and ensure that there are consistently high standards in their forces' responses to violence against women and girls and should be supported in doing so by national standards and data	AMBER	March 2022	<p>The report sub divides this recommendation with specific requirements and associated deadlines, including the force to produce and publish an action plan [HMICFRS deadline March 2022] pending input from National Police Chiefs Council (NPCC) lead setting the framework.</p> <p><u>January Update</u> Several steps have been taken to meet the recommendation requirements.</p> <ul style="list-style-type: none"> - Draft of Strategic Delivery plan has been produced and being considered - A communication strategy has been drafted and awaiting circulation - Exploring the opportunities to capture qualitative and quantitative data to implement KPIs and have an accountable performance reporting structure. 	Head of Action Fraud and NFIB	Amber - the action plan for this recommendation is on track with several steps being taken to achieve the recommendation and the action owner believes they will meet the march deadline.	


Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January 22	Direction of Travel
				<ul style="list-style-type: none"> - final version of the strategic local and governance has been finalised and circulated - Action Plan has been drafted and it being updated. 			


Police super-complaint - A duty to protect: Police use of protective measures in cases involving violence against women and girls

A national report HMICFRS
Published 25th August 2021

There are 7 actions for the force, 4 complete 3 are in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January 22	Direction of Travel
7	<u>Recommendation</u> Chief constables should review and if necessary refresh their policy on how the force processes notifications of NMOs [Non-molestation orders], so officers can easily identify if an NMO exists.	AMBER	No date set by HMICFRS March 2022	This is a wider issue for policing – The issues are caused by delays in courts placing orders on to Police National Computer (PNC) (not police) which is where officers gain access to the information. <u>December Update</u> Court meeting was unable to offer an immediate solution. There are still delays	Head of PPU	Amber - this is ongoing and is reliant on CoLP partners and other organisations. Work arounds are	

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January 22	Direction of Travel
				<p>caused by Covid and this is impacting all areas of the court system.</p> <p>The good working relationship with the court independent domestic violence advocate (IDVA) means that any Domestic Abuse (DA) results linked to the COLP are reported to the Public Protection Unit (PPU). This would enable early notification of any NMO granted.</p> <p>Qualifiers have recently been reviewed by the Niche region, meaning additional qualifiers cannot not be added at this time. A solution is to add a flag to the person record. The PPU supervisors are aware of how to add these flags. They are searchable as part of a Niche search; they don't require BOBS.</p>		being made due to technology constraints to make sure the right information is recorded.	
11	<p><u>Recommendation</u></p> <p>Chief constables should, until Domestic Abuse Protection Notices (DAPOs) replace Domestic Violence Protection Notices (DVPNs) and Domestic Violence Protection Orders (DVPOs) in their force:</p> <p>A. review, and if necessary refresh their policy on DVPNs and DVPOs, and in line with the overarching recommendation:</p> <p>I. ensure that there is clear governance and communication to prioritise the effective use of DVPNs and DVPOs, when these are the most appropriate tools to use;</p>	AMBER	<p>No date set by HMICFRS</p> <p>March 2022 for review</p>	<p>The following is complete:</p> <ul style="list-style-type: none"> – Use of DVPNs monitored as part of DA DIP sampling in Crime Scrutiny Group to ensure it has been considered. – Forms part of PPU supervisor review of all DA cases prior to No Further Action(NFA). – Clear guidance included in Standard Operating Procedure (SOP). – Monthly meeting with Crown Prosecution Service (CPS)/MPS and 	Head of PPU	Amber - this is ongoing and until all training has been completed it will remain amber.	

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January 22	Direction of Travel
	<p>II. monitor their use to ensure they are being used effectively; and</p> <p>B. ensure experience and lessons learned on using DVPN/DVPOs informs the use of DAPOs.</p>			<p>courts discuss issues arising from DVPNs, best practice, changes to process and lessons learned.</p> <p><u>December update</u></p> <ul style="list-style-type: none"> – The DVPN policy has been reviewed and is still relevant. – Training for Supts/C/Supts still has not taken place. – Initial refresher inputs for CID and PPU have been completed and there will be further training in 2022. The idea is to make it a continual process. 			
13	<p><u>Recommendation</u></p> <p>Chief constables should assure themselves that:</p> <p>A. their officers are fully supported in carrying out their duties to protect all vulnerable domestic abuse victims by:</p> <ol style="list-style-type: none"> 1) ensuring their officers understand the suite of protective measures available (including new measures such as DAPOs); 2) ensuring officers are aware of referral pathways to third-party support organisations which are available to protect vulnerable domestic abuse victims; and 3) ensuring their officers have guidance and support on how to choose the most appropriate response for the situation; and 	AMBER	<p>No date set by HMICFRS</p> <p>August 2022 for review</p>	<p>A</p> <p>Bullet 1, 2 and 3 - PPU have been trained as part of specialist training in relation to protective orders available. (All relevant Violence Against Women and Girls cases would oversee/investigated by PPU). Supervisors include as part of supervisor review, appropriateness of relevant/available orders. Funding for future domestic abuse matters training has been secured which will include this topic for all frontline staff alongside.</p> <p>Referral pathways are clearly documented in SOPs and intranet and Vulnerable Victim Advocate is well publicised and has</p>	Head of PPU and Head of Learning & Development	<p>Amber - this is ongoing and until all training has been completed it will remain amber. Review date for August set once training delivered.</p>	


Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January 22	Direction of Travel
	B. governance is in place to monitor the use of all protection orders and to evaluate their effectiveness, including by seeking the views of victims.			<p>recently briefed all frontline staff outlining available support– this stretches across the partnership.</p> <p>B – Dip sampling and then Domestic Abuse surveys continue and results reports to appropriate governance meetings</p> <p><u>January update</u> Domestic abuse matters training was delayed slightly as we were required to complete some internal procurement steps since the contract will be above our usual procurement threshold. We now have approval from our Chief Operating Officer to award a direct contract and this is underway. Domestic Abuse Matters are going to work with us on logistics in the new year, we have tentatively agreed that this will be delivered in the months of May, June, July and August.</p>			

A review of 'Fraud: Time to choose'

A national report HMICFRS

Published 5th August 2021

There are 3 new actions for the force, 2 complete and 1 in progress

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January 22	Direction of Travel
2	<u>Recommendation</u> By 31 March 2022, the National Police Chiefs' Council (NPCC) Coordinator for Economic Crime with the National Crime Agency (NCA), National Economic Crime Centre (NECC) and City of London Police should set up an effective national tasking and co-ordination process for fraud.	AMBER	March 2022	This relates to the FOIM (Fraud Operation Intelligence Meeting) which is run by the NECC. Work is in progress to agree a process which will include workflow, agreed mitigation, agreed risk holders, agreed escalation process, response timeframes etc <u>January Update</u> This is still a work in progress. <ul style="list-style-type: none"> – Tasking has been partially revolved through Lead Force Operations Room (LFOR) – Escalation between policing and NECC/NCA via bilateral tasking arrangements – FOIM set up for monthly meeting – Intelligence side of meetings successful, operationally no cases have been accepted or escalated from policing to NCA/NECC or partners. 	Commander National Lead Force Operations	Amber - this is progressing well and the team working on this do not see a march deadline to be an issue at this stage.	


Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January 22	Direction of Travel
				<ul style="list-style-type: none"> There are gaps as to when a case is not accepted by policing there is no means of tasking it. CoLP looking at using APMIC to task P1/92 cases. Working group set up to discuss and plan resolution and recommendations. 			


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


A national joint thematic HMICFRS and HMCPSi

Published 16th July 2021.

There are 7 actions for the force 1 is closed, 3 are complete and 3 are in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January 22	Direction of travel
3	<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.	AMBER	December 2021 for review June 2022	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. Audits of outcome 16 [Domestic Abuse] have taken place and the CPS have agreed to look at outcome 15 [Domestic Abuse] with PPU.	Head of CJS Services and FCIR	Amber – Data is being collected but the process and procedures to extract needs to be clarified. This will	

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January 22	Direction of travel
				<p>Consideration to be had between CJS/PPU and Crime Standards Board as to how this could be captured.</p> <p><u>January Update</u> Agreed by Commissioner and Crime Standards Board (CSB) that outcomes should be part of the performance regime, but discussion is now how do we implement this and how do we extract the data. Suggestion is that we ask the Niche team to see whether we can get a section added that can be filled in when a victim withdraws so that can be extracted as data by PIU. Work still needs to be done on this and changes to systems can take time, hence the new suggested deadline of June for review on this.</p>		involve working with the Niche Team, and suggestion is to get new area in Niche added to extract the data from fully. This means a new deadline of June is required.	
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 [NFA] has been made. They should implement any changes needed so that these difficult messages are conveyed in a timely way that best suits the victims' needs.</p>	AMBER	<p>December 2021</p> <p>March 2022</p>	<p>The force awaits any national/regional comms re consultation. However, Rape SOP has been updated to include section on NFA, and that victim should be informed ASAP by the Sexual Offence Investigative Techniques (SOIT) and Independent Domestic Abuse Advisors (IDVA)/ Vulnerable Victims Advocate (VVA), in person where possible and should be offered the opportunity to speak with the Senior Investigating Officer (SIO) to discuss.</p>	DCI Head of CJS and Custody	Amber – some progress has been made but a deadline extension of March has been advised due to webinars	


Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January 22	Direction of travel
				<u>January Update</u> There have been no national or regional comms. There are a series of national webinars/conferences on rape in January which we will be attending and ascertain if anything related is communicated here. In addition the DCI will contact London CPS RASSO (Rape & Serious Sexual Offences) lead to ascertain if there is a position from CPS. March deadline requested due to ongoing webinars/ conferences over Jan.		and conference s not happening until January.	
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 April 2022	This is communicated as part of final contact with victim. Force Rape SOP has been updated and published to ensure this is recorded on the Niche system. Rape SOP outlines needs to inform victims of Victim Right to Review at point of NFA and forms part of supervisor (DS and DI level) final supervisor review. The gap: Currently there is no system to record how many Victim Right to Reviews are taken up. This is the next step. <u>January Update</u>	DCI Head of CJS and Custody	Amber – progress is being made but work still needs to be done on reviewing levels of take up. This links with having better data from Niche. Review progress	

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January 22	Direction of travel
				Several steps taken already. Investigators understand and we have SOPs in place. The next step is with regards to periodical reviews. In order to be able to better extract and understand the data. This is linked to the need for better data extraction from Niche in recommendation 6.		with this in April 2022	

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 26th May 2021

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

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January 22	Direction of travel
2	<u>Recommendation</u> <u>To chief constables</u> Assure themselves that police officers and staff (including non-specialist staff, as appropriate) are supported through access to learning, specialist	GREEN	October 2021 Now December 2021 [c]	NEW GREEN a) easily access information and advice on modern slavery and human trafficking through their force systems The force SOP is reviewed and updated regularly to ensure it	T/DI Next Gen Project	Green – all sections of this recommendation have now been achieved/	

	<p>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>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</p>			<p>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 (Single Point of Contact) 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> <p>A 2-day modern slavery investigator course is being developed in conjunction with L&OD which will be delivered to all detectives / investigators.</p>		put into place	
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	their exploiters is considered in all cases to protect victims from prosecution.			Modern Slavery will be included in the next round of vulnerability training for front line officers.			
				- Dedicated exploitation sergeant within PPU will be contact point for advice relating to Modern Slavery			
				b) identify possible victims of modern slavery			
				<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 (Modern Slavery & Human Trafficking (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> <p>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>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>2 CoLP modern slavery SPOCs are attending a train the trainer course allowing them to give inputs to</p>		
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			partners and businesses within the City of London.		
		NEW GREEN	<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>This has been included as part of training inputs and formed part of the Operation Sun guidance to officers (Romanian juveniles).</p> <p>Recently highlighted when 2 Vietnamese males inside a cannabis farm were released without charge enabling them to provide evidence against potential perpetrators. (Op Honeysuckle 21*33599) – investigation ongoing).</p> <p>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 associated</p>		

			<p>crime types return to establish if the training has had an impact.</p> <p>Crime types commonly related to criminal exploitation within the City of London have started to increase following Covid Lockdown. However, to date arrests for these offences have been limited and none have resulted in NRM (National Referral Mechanism) referrals. There are plans in place to recirculate guidance to officers following learning from Op Sun (Juveniles potentially criminally exploited) in the coming weeks. The newly form Drugs Squad who own all drug supply investigations have also attended County Lines CPD. Force wide mandatory vulnerability training is being delivered by L&OD which contains inputs on County Lines and MSHT. This is to be reviewed at the end of November 2021.</p> <p><u>January Update</u> Vulnerability training is continuing across the force and inputs are being provided to student officers and trainee detectives. A DS has been posted to the new</p>		
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				exploitation DS role in PPU which will provide another level of scrutiny to ensure potential victims are not missed.		
			NEW GREEN	<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>This is included in part of modern slavery training and CPD.</p> <p>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>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>On previous occasions potential child victims of exploitation have</p>		

			<p>been taken to a place of safety after being put into police protection and were housed by social services.</p> <p>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. This is shown in Op Honeysuckle - 21*33599.</p> <p>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>		
			<p>e) understand how to advise victims what support is available them</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</p>		

			<p>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>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>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>		
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			Vulnerable Victim Coordinator available to assist with signposting to appropriate support.		
			<p>f) understand the National Referral Mechanism and duty to notify requirement, and know how to make good-quality referrals</p> <p>Training and CPD in this area have been provided to students, frontline officers and investigators.</p> <p>Advice is found in the SOP, on the intranet and through modern slavery SPOCs.</p> <p>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>Dedicated Exploitation Sergeant post created in PPU under</p>		

				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>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>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</p>		


				<p>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>Force wide mandatory vulnerability training is being delivered by L&OD which contains inputs Section 45 defence. All officers in force will receive this training this financial year.</p>			
3	<p><u>Recommendation</u></p> <p><u>To chief constables</u> 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>	AMBER	<p>October 2021 now December 2021</p> <p>October 2022</p>	<p>There is current SOP policy in place for ownership of reactive MSHT investigations. This can become more challenging with planned intensification investigations. As part of a review, the vulnerability lead is allocating deputy leads for MSHT with specific roles and responsibilities which should streamline the case acceptance criteria between departments.</p> <p><u>January Update</u> The above is still in progress. A new lead has been appointed and is in the process of taking over the MSHT lead. The Force believes October 2022 is a realistic deadline due to resourcing.</p>	T/ DI ART manager	<p>Amber - A new lead for MSHT has been appointed and a new deadline is needed to make sure this is done correctly. The new deadline has been proposed as October 2022</p>	

Disproportionate use of Police powers

A national report HMICFRS

Published 26th February 2021

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

Recommendations & Areas for Improvement		Status	Due Date	Comment		CoLP Task Owners	Position in January	Direction of Travel
1	<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.	AMBER	July 2022	Ref.	Task			
				1.2	Task Paper to Stop and Search (S&S) and Use of Force (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. Current position Mentivity training [Frontline officers will soon be invited to gain an insight into young black people’s experience of interacting with the police] will commence Autumn 2021 [October 2021] for front line officers. Pilot allows for 20 officers, this will be reassessed following feedback from the attendees. The session will be run by Sayce Holmes-Lewis, who founded the	Head of Learning & Development	Amber – Progress is being made with bulletins going out and training scheduled.	


Recommendations & Areas for Improvement	Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel
			<p>charity in January 2016 alongside Leon Wright and Tyson Holmes-Lewis, after Sayce was stopped by police. He now works with police forces, including the Metropolitan Police Service (MPS), to increase understanding around the experiences of young black people in the UK. Watch a video of MPS colleagues receiving training here.</p> <p>Virtual CPD sessions focusing on stop and search was delivered to 85 officers and staff this year and a written bulletin sent force wide to compound this learning.</p> <p>A Focus on CPD virtual training session providing an input on communication was well received and a written bulletin will be published in December 2021</p> <p><u>January Update</u> Focus on communication bulletin published Jan 2022</p> <p>Stop search training for frontline officers has been built into the training timetable and is scheduled for June and July 2022</p>			

Recommendations & Areas for Improvement	Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel
			<p>Current student officer cohort received improved Stop Search training including varied practical scenarios and were tasked to produce a best practice video for dissemination to the rest of the force via the Learning and Development video Streams.</p> <p>An additional video is being developed in collaboration with the British Transport Police (BTP) with a planned release within 4 weeks</p>			


Police super-complaint: police data sharing for immigration purposes


A Joint national report following an investigation by HMICFRS, College of Policing and the Independent Office for Police Conduct
Published 17th December 2020

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

Recommendations & Areas for Improvement	Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel
1 <u>Recommendation</u> As an interim measure, pending the outcome of recommendation 2, where officers only have	WHITE pending the	February 2021 for initial	Following initial consideration of the report recommendation it has been determined	Head of CJS and Custody /	WHITE – This is still pending	

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel
	<p>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"> The College of Policing guidance will also clarify the difference between insecure and uncertain status and immigration offending. Any sharing of information should be done in compliance with Information Commissioner's Office (ICO) guidance. 'Third party' could include a local or national specialist victim support organisation or another individual/organisation that can act as an intermediary and advocate on the victim's behalf 	outcome of the NPCC Lead challenge to HMICFRS	<p>review [completed]</p> <p>July 2021 for the revision and publication of force SOP</p>	<p>that the force Domestic Abuse SOP needs to be revised to offer specific guidance. 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 (Multi Agency Risk Assessment Conference) – with the overarching focus being on victim welfare.</p>	Head of PPU	and waiting on the outcome of the NPCC Lead challenge to HMICFRS.	

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel
	in communications with Immigration Enforcement – as required.						
4	<p><u>Recommendation</u></p> <p>With reference to recommendation 1, and in consultation/collaboration with local or national specialist organisations, chief constables should take steps to ensure that all migrant victims and witnesses of crime are effectively supported through safe reporting pathways to the police and other statutory agencies. They should:</p> <ul style="list-style-type: none"> • ensure there is a proper policy and practice framework in place for officers to work within; • develop victim and witness support policies that reflect the characteristics of the safeguarding protocol set out in recommendation 3, and: • draw on all relevant national guidance with particular reference to the Code of Practice for Victims of Crime and data protection legislation; • are developed in partnership with and include pathways to the relevant specialist organisations for supporting victims and witnesses with insecure immigration status; • are clear about the circumstances in which information will be shared by police with immigration enforcement; • provide clarity about the purpose of sharing information at different points of the pathway; and 	WHITE	<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>	Head of CJS and Custody / Head of PPU	WHITE – This is still pending and waiting on the outcome of the NPCC Lead challenge to HMICFRS.	

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel
	<ul style="list-style-type: none"> explicitly recognise the importance of telling victims, witnesses and supporting agencies whether information will be shared with Immigration Enforcement, and if so, when and in what circumstances. promote understanding among police officers and staff to differentiate between responses to victims of modern slavery/human trafficking and victims of domestic abuse; promote awareness within their forces of any existing pathways to specialist organisations for supporting victims with insecure immigration status; ensure the policy and practice framework is adopted by all officers and staff who come into contact with victims of crime who have insecure immigration status; and promote police engagement in regular outreach community work, as highlighted as good practice in this report. 						
5	<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.	WHITE	February 2021 for initial review	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.	Head of CJS and Custody / Head of PPU	WHITE – This is still pending and waiting on the outcome of the NPCC Lead challenge to HMICFRS.	


Recommendations & Areas for Improvement	Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel

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	CoLP Task Owners	Position in January	Direction of Travel
1 <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: <ul style="list-style-type: none"> • the creation of a national police cyber-dependent crime network; • the remit of any such network; • how the network engages with other law enforcement agencies; and • the tasking and co-ordinating responsibilities that will be required for the network to be effective. 	WHITE	November 2020 Now September 2021 for update from the joint working group	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. The Home Office, CoLP and NPCC have agreed to establish a working group to consider options to implement the recommendation, but hasn't met yet. Progress has been waylaid by the Spending Review and developing the new National Cyber Strategy.	Det Ch. Supt. Programme Lead NPCC Cyber Crime Programme	WHITE - No change. The force is reliant on progress beyond its control but is attempting to influence.	


Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel
				<p>This should start to settle down by end of September 2021 so we would expect to start making progress then.</p> <p>In the meantime the Det Ch Supt has been meeting with the National CT Policing HQ to get their advice on how to manage a national network and reviewing their collaboration agreements which they shared with me.</p> <p>This action is held at WHITE since the force is reliant on progress beyond its control but is attempting to influence.</p>			

Crime Data Integrity inspection 2019

A force report by HMICFRS

Published August 2019

This report makes 6 areas for improvement for the force; 4 are complete, 2 closed

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel
6	<u>Area for Improvement</u> The force should immediately improve its use of cannabis warnings, penalty notices for disorder and community resolutions, to make sure it only issues them in accordance with national guidance.	CLOSED	February 2020 Extended to July 2020 but need to be reviewed [Reported to PAB] Extended to September 2020 to ensure improvements are embedded	<u>Current Position</u> The intrusive review continues with bi monthly sampling and audit. Personal emails from the Strategic lead are still issued with onward learning. L&OD will continue with the new student officers give a more in depth learning package for this topic. Continued grip and overview by the strategic lead has become business as usual – compliance is not expected to improve further until the process is fully digitalised which will not happen due to the expense in coding with the developer. The implementation of the 2 Tier system [late 2023] will include the cessation of Cannabis Warning , community resolutions and PNDs.	Head of CJS Services Ch. Supt Head of Local Policing	CLOSED - this has been closed. This was discussed with the Head of Strategic Development. The Force is of the view that further progress is unlikely and the step change will be 2 Tier Out of Court Disposals	


Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel
			<p>Extended to July 2021</p> <p>Now November 2021 to further assess performance</p>	<p><u>TIER 2 OOCd update</u></p> <p>Update below from Gateway 2 report which is going to PMO in November 2021 for permission to proceed with the Out of Court Disposals (OOCd) project.</p> <p>Overall project timeline: Full implementation for April 2023, approximately 16 Months to deliver the project.</p>		<p>process implementation (late 2023). Action Closed. The most recent audit had a pass rate of 81%.</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	CoLP Task Owners	Position in January	Direction of Travel
10	<p>Cause of concern</p> <p>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</p>	AMBER	<p>January 2020</p> <p>Now December</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</p>	DCI Head of Major Crime	<p>AMBER - This is progressing but financial challenges</p>	

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel
	<p>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>2021 pending appointment of a force Victim Champion</p> <p>June 2022</p>	<p>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.</p> <p>This position has not been filled at this time.</p>		<p>are delaying completing. A position paper on Victim Services is on the agenda as a deep dive .. This will coincide with SWP revisit to recruit for the post previously put on hold due to financial challenges.</p>	

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel
				<p>A DCI took up the role of temporary Victim Champion until Transform can recruit and embed the new civilian Champion.</p> <p>The aims of the DCI were to:</p> <ol style="list-style-type: none"> 1. reignite the above mentioned 'Victim Virtual Journey' workshops to establish the current workflows and introduce measures to improve performance and satisfaction. 2. carry out benchmarking, consultation and include partners to inform decision making and 3. introduce new systems/SOP where necessary. <p><u>January Update</u></p> <ol style="list-style-type: none"> 1. A role profile is currently being drafted for a victim service manager following submission to Local Resources Planning Meeting (LRPM) to be submitted to Strategic Workforce Planning (SWP) in Feb. 2. A working group will be formed with representatives from each police area to understand the victim journey within the CoLP. This journey will then be documented. Learning from across the organisation will be shared to provide 			


Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel
				<p>policy to introduce consistency of approach across the organisation.</p> <p>3. As part of the new HQ services victim service measures will be introduced and monitored as part of the work on MI data.</p> <p>A position paper on Victim Services is on this agenda as part of a deep dive requested by the Chair. This will coincide with SWP revisit to recruit for the post previously put on hold due to financial challenges.</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	CoLP Task Owners	Position in January	Direction of Travel
2	<p>Area for Improvement</p> <p>The force should implement a process to get feedback from vulnerable victims.</p>	AMBER	<p>December 2019</p> <p>New January 2022</p>	<p>Previously delays to implementing this area for improvement have centred on the absence of resource [Vulnerable Victim Advocate (VVA)] within PPU to undertake the required surveys.</p> <p>This has been resolved but a new issue is presenting.</p>	DCI Head of Major Crime	Amber – progress is being made and first surveys going out in Jan 2022. With this in mind the	


Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel
			Now March 2022	<p>In order to undertake these surveys the VVA requires a list of those to contact – this requires PIU to extract data. This process is not just the running of a report with a criteria, each return record must be examined to ensure the victims meets a set criteria.</p> <p>A meeting was held on the 1/11/2021 [chaired by DCI Head of CJS and Custody] PPU/sector policing /ECD are producing the exclusion criteria and Performance Analysis Manager are producing a sample including hate crime, stalking and harassment, vulnerable Economic Crime victims and lower-level sexual offences in the following week. The existing DA survey questions are being reviewed but should be fit for purpose.</p> <p>The aim is then that the vulnerable victim advocate can then start the surveying as a pilot [expected December 2021] – the force will see how long it takes her to complete the surveys as if it is too time consuming it will impact on her other roles and we may need to consider out sourcing.</p> <p>The Performance Analysis Manager and her team will then do the analysis as they do for DA.</p>		deadline has been moved to March to allow for Survey and other tasks to be completed.	

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners	Position in January	Direction of Travel
				<p><u>January Update</u></p> <p>Progress has been made in that the sample has now been produced by the PIU and circulated. This is currently being scrutinised by PPU and Local Policing to establish the exclusion criteria (to ensure the right victims are contacted).</p> <p>A staged rollout of surveys is required as the sample set for vulnerable Fraud Victims is yet to be formulated.</p> <p>The first cohort of surveys will focus on Domestic Abuse and will commence by the 15/01/2022.</p> <p>The team behind this have asked for a new deadline of March 2022 due to surveys commencing only in January.</p>			

Understanding the difference: the initial police response to hate crime

A national joint report by HMICFRS
Published July 2018

This report makes 15 recommendations. 8 are for the force and 7 of these are complete, 1 is in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment	CoLP Task Owners		Position in January	Direction of travel
8	<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. <ul style="list-style-type: none">• We recommend that, within six months, the NPCC lead for hate crime works with the College of Policing to review the operational guidance about the minimum standard of response to establish if it is still appropriate and relevant for forces• We recommend that, following the review, any agreed minimum standard of response for forces should be monitored by force governance processes, including external scrutiny.	AMBER	December 2020	This action has been held at WHITE pending the publication of the College of Policing APP.				
			Now December 2021 to establish progress	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.				
			Now January 2022 to align with PEEL 2018/2019 [rec 2] above	The deadline has been reset to June 2021 to enable Sector Policing to embed necessary changes The following actions have been developed:				
			Now March 2022 to align with PEEL 2018/2019 [rec 2] above	<u>Task [4]</u> Once the additional VVA post is in place – the independent survey of victims of hate crime <u>Current Position</u> This action is linked to recommendation 2 PEEL 2018/2019 – a current update is provided above, however the deadline for that action is now January 2022. Both action deadlines now aligned.	AMBER	Head of PPU and Performance Analysis Manager	Amber- this is in progress and is linked to recommendation 2 PEEL 2018/2019. Due to actions being taken now the deadline will	

Recommendations & Areas for Improvement	Status	Due Date	Comment	CoLP Task Owners		Position in January	Direction of travel
			<p><u>January Update</u> Progress has been made in that the sample set for vulnerable victims has now been produced by the PIU and circulated. This is currently being scrutinised by PPU and Local Policing to establish the exclusion criteria.</p> <p>Ch Inspector Sector Policing is in the process of benchmarking survey activity with other forces. ETA February 2022.</p>			be extended to March 2022.	